

Dangerous Waste Regulations Self-Audit Checklist

This self-audit checklist includes many items from the dangerous waste regulations that we evaluate during a compliance inspection. While it's a helpful tool, it **doesn't provide an allinclusive list** of the requirements you must follow for proper dangerous waste management (such as central accumulation area <u>weekly inspections</u>¹ or <u>general facility</u>² inspections).



Facility name:

Dangerous Waste Management Requirements

The following regulations apply to all generators. Check off each item you completed.

Identify solid waste

Solid waste is any discarded material without an exclusion³ or variance.⁴ Liquids can be solid wastes. For more details about identifying solid waste, refer to WAC 173-303-016.

Yes	Action
	Evaluated materials to determine if they were solid wastes.
	Made sure hazardous secondary materials were legitimately recycled, ⁵ not sham recycled. ⁶
	Kept documentation to demonstrate recyclable material wasn't speculatively accumulated. ⁷

Designate your waste

Designation is a fairly involved process. Visit our <u>designation webpage</u>⁸ to learn more about this process. For more details about designating your waste, refer to WAC 173-303-070 through -100.

Yes	Action
	Promptly designated solid wastes at the point of generation ⁹ or upon discovery on your site.
	Assigned all applicable waste codes to each waste stream.
	Kept designation records for five years. ¹⁰

¹ https://apps.ecology.wa.gov/publications/SummaryPages/1204019.html

² https://apps.ecology.wa.gov/publications/SummaryPages/1304012.html

³ Under WAC 173-303-017(2).

⁴ Granted under WAC 173-303-017(5).

⁵ See legitimacy criteria for recycling of hazardous secondary materials in WAC 173-303-019:

https://apps.leg.wa.gov/wac/default.aspx?cite=173-303-019.

⁶ Sham recycled materials aren't legitimately recycled and are considered a discarded and solid waste. Legitimate recycling produces valuable products or ingredients, are sold to a third party, and/or are comparable to a legitimate product or intermediate.

 ⁷ If you have speculatively accumulated recyclable material, you must recycle 75% of it within a calendar year (January–December).
 ⁸ http://ecology.wa.gov/designation

⁹ **Point of generation** means the date and place a material is first identified as a solid waste. If you generate or discover a solid waste on your property, you must determine if the solid waste designates as dangerous waste or extremely hazardous waste.

¹⁰ SQGs must retain all data and records supporting knowledge-based determinations in accordance with WAC 173-303-210(3).

Determine your generator category

Your generator category is based on the amount of dangerous waste you generate each month. It may change each month. For more details about generator categories, refer to WAC 173-303-169 or visit our <u>generator</u> <u>category webpage</u>.¹¹

Your Category	Generator Category Criteria
	Small quantity generator (SQG) —generated less than or equal to the following amounts in a calendar month:
	 Less than or equal to 220 pounds of dangerous waste that isn't acute hazardous waste (AHW) and/or toxic extremely hazardous waste (EHW).
	 Less than or equal to 2.2 pounds of AHW and/or toxic EHW.
	 Less than or equal to 220 pounds of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any AHW and/or toxic EHW.
	Medium quantity generator (MQG) —generated any of the following amounts in a calendar month:
	 Greater than 220 pounds but less than 2,200 pounds of dangerous waste that is not AHW and/or toxic EHW.
	 Less than or equal to 2.2 pounds of AHW and/or toxic EHW.
	 Less than or equal to 220 pounds of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any AHW and/or toxic EHW.
	Large quantity generator (LQG)—generated any of the following amounts in a calendar month:
	 Greater than or equal to 2,200 pounds of dangerous waste that is not AHW and/or toxic EHW.
	 Greater than 2.2 pounds of AHW and/or toxic EHW.
	 Greater than 220 pounds of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any AHW and/or toxic EHW.

Follow treatment by generator requirements

Common methods for treating your waste on site include elementary neutralization, solidification, evaporation, filtration, carbon adsorption, separation, polymerization, and aldehyde deactivation. For more details about treatment by generator requirements for MQGs and LQGs, refer to WAC 173-303-170(2)(b)(iv).

Yes	Action
	Used a treatment log to record the dates and amounts of waste treated on site.
	Kept treatment log for five years.
	Met the general performance standards ¹² (i.e., treated wastes in a way that didn't present a risk to human health and the environment).

¹¹ http://ecology.wa.gov/GeneratorCategory

¹² Performance standards: WAC 173-303-283(3)(a) – (i).

Yes	Action
	Didn't treat dangerous waste on drip pads.
	Contacted Ecology prior to using a different treatment method.

Respond to spills and discharges into the environment

For more details about spills and discharges into the environment, refer to WAC 173-303-145.

Yes	Action
	Immediately reported dangerous waste or hazardous material spills to the environment to Ecology.
	See our <u>Focus on: Reporting Dangerous Waste Spills</u> ¹³ publication.
	Controlled or mitigated dangerous waste or hazardous material spills or discharges.

Protect stormwater and industrial wastewater

Yes	Action
	Didn't discharge any polluting matters ¹⁴ to waters of the state. ¹⁵
	Met all requirements for the pretreatment of dangerous wastewater ¹⁶ if you use the permit by rule exclusion. See our <u>Focus on: Treating Dangerous Waste Under Permit by Rule¹⁷</u> publication.

Properly manage specific types of waste

Used oil

For more details about used oil, refer to WAC 173-303-515 or our used oil webpage.¹⁸

Yes	Action
	Stored used oil in containers or tanks labeled with the words "Used Oil."
	Immediately cleaned up used oil spills or leaks.
	Didn't mix used oil with dangerous wastes (such as chlorinated solvents, antifreeze, etc.).
	Kept used oil in closed containers, except when adding or removing used oil.
	Managed used oil in accordance with all used oil requirements in WAC 173-303-515.

Recycled spent antifreeze

For more details about recycled spent antifreeze, refer to WAC 173-303-522 or our <u>spent antifreeze</u> webpage.¹⁹

١	ſes	Action
		Made sure spent antifreeze that's managed under the rule is ethylene glycol-based.

¹³ https://apps.ecology.wa.gov/publications/SummaryPages/2004036.html

¹⁴ **Polluting matter** includes waste that may not be a dangerous waste or hazardous substance, such as wastewaters from cleaning activities.

¹⁵ https://apps.leg.wa.gov/rcw/default.aspx?cite=90.48.080

¹⁶ WAC 173-303-802(5)

¹⁷ https://apps.ecology.wa.gov/publications/SummaryPages/2104014.html

¹⁸ https://ecology.wa.gov/UsedOil

¹⁹ https://ecology.wa.gov/Antifreeze

Yes	Action
	Kept spent antifreeze separated from other dangerous wastes.
	Stored spent antifreeze in containers labeled with the words "Spent Antifreeze."
	Reclaimed and recycled spent antifreeze.
	Kept spent antifreeze records ²⁰ for five years.
	Managed spent antifreeze in a way that prevented releases to the environment during accumulation (e.g., keeping containers closed and using secondary containment).

Universal waste

These requirements apply to handlers of universal waste.²¹ For more details about universal waste, refer to WAC 173-303-573 or the <u>universal waste webpage</u>.²²

Yes	Action
	Managed universal wastes in a way that prevented releases to the environment (e.g., kept containers
	closed).
	Labeled universal waste containers as one of the following:
	Universal Waste—Batteries
	Waste Batteries
	Used Batteries
	Universal Waste—Lamps
	Waste Lamps
	Used Lamps
	Accumulated universal wastes one year or less.
	Demonstrated universal waste storage time by dating containers, keeping recycling receipts, recording dates in a log book, etc. ²³
	Trained employees on proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.
	Immediately contained all releases of universal wastes and determined if materials resulting from the release designated as dangerous waste.

²⁰ Proof of reclamation/recycling is either a log for on-site reclamation/recycling or an invoice or bill of lading for off-site reclamation/recycling

²¹ A **small quantity handler of universal waste** accumulates less than 11,000 pounds total of universal waste (batteries, mercurycontaining equipment, and lamps, counted collectively) and/or does not accumulate more than 2,200 pounds of lamps at any time. See the definition of and requirements for large quantity handlers of universal waste in subsections WAC 173-303-040 and WAC 173-303-573(17) through (27).

²² https://ecology.wa.gov/universal-waste

²³ Apply a start date on container, use an inventory system, or any other method that demonstrates length of accumulation time.

Dangerous Waste Management Requirements by Generator Category

All generators must meet requirements based on their generator category. Refer to WAC 173-303-170 for more details. Find the sections that apply to your generator category and check off each item you completed.

SQG requirements

See WAC 173-303-170(2)(a)(i) for more details about SQG independent requirements. You may also need to keep records of certain activities. Refer to the <u>recordkeeping requirements</u> section for more information.

Independent requirements for SQGs

Yes	Action
	Dangerous waste management didn't pose a potential threat to human health or the environment.
	Submitted a Dangerous Waste Annual Report by March 1 st for the previous calendar year if you have
	an active EPA/State ID Number.

Conditions for exemption: SQGs

You may store dangerous waste on site without obtaining a treatment, storage and disposal (TSD) facility permit²⁴ if you meet SQG conditions for exemption.²⁵ For more details about exemption conditions, refer to WAC 173-303-170(2)(b)(i).

Yes	Action
	Made sure total accumulation amounts at one time didn't exceed:
	 2,200 pounds of dangerous waste.
	• 2.2 pounds of AHW or toxic EHW.
	 220 pounds of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any AHW and/or toxic EHW.
	Did one of the following with your accumulated dangerous waste: ²⁶
	 Treated or disposed of it in a permitted and authorized on-site facility.
	 Sent it to a permitted and authorized off-site facility.
	Met all requirements if managing dangerous waste under the <u>alternative standards for episodic</u> <u>events</u> . ²⁷
	If sent to an LQG under the control of the same operator:
	 Labeled all containers and tanks with the words "Dangerous Waste" or "Hazardous Waste."
	 Marked all containers with the hazard(s) of the contents.

²⁴ As specified by WAC 173-303-600.

 $^{^{\}rm 25}$ Conditions for exemption for an SQG: WAC 173-303-171.

²⁶ Both options are listed in WAC 173-303-171(1)(e).

²⁷ https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-173

MQG and LQG requirements

See WAC 173-303-170(2)(a)(ii) and (iii) for more details about MQG and LQG independent requirements.

Independent requirements for MQGs and LQGs

MQG	LQG	Action
		Obtained an active EPA/State ID Number for your site.
		Submitted a Dangerous Waste Annual Report ²⁸ by March 1.
		Met applicable land disposal restrictions for dangerous wastes.
		Kept land restriction records for three years.
		Documented all dangerous waste shipments using Uniform Hazardous Waste Manifests.
		Kept designated facility-signed manifests for five years.
		Properly prepared all dangerous wastes for transport.

Conditions for exemption: MQGs and LQGs

You may store dangerous waste on site without obtaining a TSD facility permit²⁹ if you meet MQG and LQG conditions for exemption.³⁰ We noted some actions that are required for MQGs only or LQGs only.³¹ For more details about exemption conditions, refer to WAC 173-303-170(2)(b).

Dangerous waste management

MQG	LQG	Action	
		Sent dangerous waste to a permitted TSD or a facility authorized to receive dangerous waste	
		for disposal.	
N/A		Accumulated dangerous waste on site for 90 days or less.	
	N/A	Accumulated dangerous waste on site for 180 days or less.	
	N/A	Made sure total accumulation amounts at one time didn't exceed:	
		 6,600 pounds of dangerous waste. 	
		• 2.2 pounds of AHW or toxic EHW.	
		 220 pounds of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any AHW and/or toxic EHW. 	
	N/A	Met all requirements if managing dangerous waste under the <u>alternative standards for</u> <u>episodic events</u> . ³²	
N/A		Followed all applicable closure requirements ³³ if you closed the facility or a central accumulation area. This includes <u>notifying Ecology</u> ³⁴ using the Site ID Form.	

²⁸ You must revise your Site ID Form if your company name, mailing address, ownership, physical location, or type of dangerous waste activity changes anytime during the year.

²⁹ As specified by WAC 173-303-600.

³⁰ Conditions for exemption for MQGs and LQGs that accumulate dangerous waste: WAC 173-303-172, -174, -200, and -201

 $^{^{\}rm 31}$ N/A means these actions are not applicable or required.

³² https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-173

³³ WAC 173-303-200(12)

³⁴ https://ecology.wa.gov/DWNotification

MQG	LQG	Action
N/A		Met all notification, recordkeeping, reporting, labeling, and disposal requirements if you received dangerous waste from SQGs under the control of the same operator. See our <u>focus</u> sheet about LQG consolidation of SQG dangerous waste. ³⁵

Dangerous waste containers

Your dangerous waste containers were:

MQG	LQG	Action
		In good condition (no severe corroding, rusting, flaking, scaling, and/or apparent structural defects).
		Made of or lined with materials that will not react with, and are otherwise compatible with, the dangerous waste contents.
		Kept closed, except when adding or removing waste.
		Not opened, handled, or stored in a manner that may cause them to rupture or leak.
		Given at least 30 inches of aisle space between rows. ³⁶
		Placed in a secondary containment system, in accordance with requirement for liquids. ³⁷
		Stored according to International Fire Code if they are ignitable or reactive.
		Separated by compatibility and accumulated in separate secondary containment.
		Clearly marked with the accumulation start date if in a central accumulation area.
		Marked or labeled with the words "Dangerous Waste" or "Hazardous Waste."
		 The words "Dangerous Waste" or "Hazardous Waste" must be legible from a distance of 25 feet or with lettering at least ½ inch tall.
		 For containers one gallon (four liters) and under, the marking or lettering can be appropriate for the size of the container.
		Marked or labeled with an indication of the hazards of the contents (i.e., ignitable, corrosive, reactive, or toxic).
		 Include descriptive words and/or pictograms that identify the hazards associated with the container's contents.
		 Make the hazard label legible or recognizable from a distance of 25 feet or with lettering at least ½ inch tall.
		 For containers one gallon (four liters) and under, the marking or lettering can be appropriate for the size of the container.
	N/A	Met the tank standards ³⁸ if accumulating dangerous waste. This includes—but is not limited to—secondary containment, labeling, compatibility, and daily and weekly tank inspections.

 ³⁵ https://apps.ecology.wa.gov/publications/SummaryPages/2004016.html
 ³⁶ A row of containers must be no more than two wide and allow for unobstructed inspection of each container.

³⁷ WAC 173-303-630(7)

³⁸ WAC 173-303-172(6)

MQG	LQG	Action
N/A		Met the tank standards ³⁹ if accumulating dangerous waste in tanks. This includes—but is not
		limited to—applicable air emissions standards, written tank assessment, secondary
		containment, labeling, compatibility, and <u>daily tank inspections</u> . ⁴⁰

Satellite accumulation areas

MQG	LQG	Action
		Your satellite accumulation areas were below all of the following amounts:
		 55 gallons of dangerous waste.
		 1 quart of liquid AHW or 2.2 pounds of solid AHW.
		Once you reached any of the above amounts, you immediately applied a start date and moved the container(s) to your central accumulation area within 3 days.
		Your satellite accumulation areas were at or near the point of generation (where you initially generated the waste).
		Your satellite accumulation areas were controlled by the operator that generates the waste or secure at all times.

Inspections

MQG	LQG	Action
		Developed a written general facility schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment at the site.
		Conducted and documented weekly inspections of each central accumulation area.
		Conducted and documented site-wide general facility inspections.
		Conducted and documented annual inspections ⁴¹ of ignitable or reactive waste areas if storing those types of waste.
		Kept a written or electronic log ⁴² at the facility for at least 5 years after the dates of inspections.

Emergency preparedness

MQG	LQG	Action
		Made sure the facility was designed and constructed to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of dangerous waste or dangerous waste constituents.
		Maintained and operated the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of dangerous waste or dangerous waste constituents.

³⁹ WAC 173-303-200(4)

 ⁴⁰ https://apps.ecology.wa.gov/publications/SummaryPages/2004031.html
 ⁴¹ WAC 173-303-395(1)(d)

⁴² The log must include date and time of inspection, printed name, and signature/electronic signature of the inspector, observations made, and date and nature of repairs or remedial actions.

MQG	LQG	Action
		Provided and maintained emergency equipment in all areas where you generated and accumulated dangerous waste.
		Made sure personnel had immediate access to communication devices and/or alarms while handling dangerous waste.
		Maintained unobstructed aisle space so personal and emergency equipment can move to any area of the facility in an emergency.
		Made and documented necessary arrangements with local emergency response authorities.
		Assigned a designated emergency coordinator that was on the premises or on call at all times.
		Met generator closure requirements if you closed a central accumulation area.
	N/A	Posted <u>dangerous waste emergency information</u> ⁴³ next to all emergency communication devices (e.g., telephones, two-way radios, etc.) or in each area directly involved in dangerous waste generation and accumulation.
N/A		Prepared a <u>written contingency plan</u> ⁴⁴ and quick reference guide. They are available upon request.
N/A		Kept copies of the contingency plan and quick reference guide at your facility.
N/A		Submitted the contingency plan and quick reference guide to local emergency responders.
N/A		Amended the contingency plan and quick reference guide when necessary.
N/A		Submitted a report ⁴⁵ to your Ecology regional office within 15 days if you had to implement the contingency plan.

Personnel training

MQG	LQG	Action
	N/A	Made sure employees were familiar with proper waste handling and emergency procedures relevant to their positions.
N/A		Developed and maintained a training program that teaches personnel to perform duties in compliance with the Dangerous Waste Regulations. See our <u>Guide to Dangerous Waste</u> <u>Training</u> . ⁴⁶
N/A		Made sure dangerous waste curriculum covers dangerous waste management procedures ⁴⁷ relevant to employees' positions and ensures facility personnel can respond effectively to emergencies. This includes training on how to use the contingency plan.
N/A		Trained employees within six months of hire.
N/A		Made sure employees reviewed the training annually.
N/A		Documented personnel training records and have them available upon request.

⁴³ https://apps.ecology.wa.gov/publications/summarypages/0804022.html

 ⁴⁴ https://apps.ecology.wa.gov/publications/SummaryPages/2004029.html
 ⁴⁵ WAC 173-303-201(14)(k)

⁴⁶ https://apps.ecology.wa.gov/publications/SummaryPages/2004034.html

⁴⁷ This includes contingency plan implementation.

Recordkeeping Requirements

Depending on your generator category, you must keep records documenting certain activities. Many of them must be retained for 5 years. Common records to keep include:

- Waste designation
- Notification of dangerous waste activities
- Dangerous waste annual reports
- Uniform hazardous waste manifests (UHWM)
- Bills of lading, or other shipping receipts
- Exception reports
- Land disposal restrictions documents
- Weekly inspection checklist
- Daily tank inspection logs

See our <u>keeping records webpage</u>⁴⁸ for more information.

- Facility inspection reports, logs, and schedule
- Employee training plan and records
- Written contingency plan and quick reference guide
- Solvent-recycling (still) logs
- Treatment by generator log
- Current permit AND original permit application when treating waste in a permit by rule unit
- Spill reports

⁴⁸ https://ecology.wa.gov/DWRecordsPublication 21-04-016

Acronyms and Abbreviations

Term	Meaning
AHW	Acute hazardous waste
EHW	Extremely hazardous waste
EPA	U.S. Environmental Protection Agency
ID	Identification
LQG	Large quantity generator
MQG	Medium quantity generator
N/A	Actions are not applicable or required
SQG	Small quantity generator
TSD	Treatment, storage, and disposal
UHWM	Uniform hazardous waste manifests
WAC	Washington Administrative Code

More Information

Contact your nearest <u>Ecology region's office</u>⁴⁹ if you have questions about dangerous waste management.



Southwest region office: 360-407-6300 Counties: Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum

Northwest region office: 206-594-0000 Counties: Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom



Central region office: 509-575-2490 Counties: Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima

Eastern region office: 509-329-3400 Counties: Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman