

RCRA Large Quantity Generators Checklist Summary of Violations

**HAZARDOUS
WASTE**



This is an inspection element checklist of common types of violations of Federal, State, or local laws and regulations. For specific details about your inspection, refer to your Notice to Comply (NTC). SCC = Sacramento County Code / CCR = California Code of Regulations / HSC = California Health and Safety Code / CFR = Code of Federal Regulations

Checklist items apply to Large Quantity Generators (LQG) of Federal Resource Conservation and Recovery Act (RCRA) Hazardous Waste.

VIOLATION CODE	AUTHORITY	DESCRIPTION
Recordkeeping / Documentation		
Authorization		
Q243	SCC 6.98.030	Generator has an active hazardous waste generator permit
Q366	22 CCR 12 66262.12	Facility has an active EPA ID number
Q839	HSC 6.11 25404(e)(4)	Program data reported electronically when required
Q841	HSC 6.5 25110.10(d)	Remote Waste Consolidation Site Annual Notification submitted
Contingency Plan		
Q376	22 CCR 12 66262.34(a)(4); 22 CCR 15 66265.51	Facility has prepared and implemented a Contingency Plan
Q378	22 CCR 12 66262.34(a)(4); 22 CCR 15 66265.53	Contingency Plan and all revisions maintained at the facility
Q377	22 CCR 12 66262.34(a)(4); 22 CCR 15 66265.52	Contingency Plan contains all required content
Q814	22 CCR 15 66265.56(j)	Submitted a contingency plan activation report to DTSC
Training		
Q375	22 CCR 12 66262.34(a)(4); 22 CCR 15 66265.16	Trained facility personnel annually and maintained required documentation until closure
Manifests		
Q368	22 CCR 12 66262.20	Prepared a Uniform Hazardous Waste Manifest for the transport of a hazardous waste
Q371	22 CCR 12 66262.23(a)	Properly completed all Uniform Hazardous Waste Manifests
Q372	22 CCR 12 66262.42	Completed all Uniform Hazardous Waste Manifest exception reporting requirements
Q373	22 CCR 12 66262.40(a)	Signed copy of Uniform Hazardous Waste Manifests kept for 3 years
Q369	22 CCR 12 66262.23(a)(4)	Submitted a legible copy of each Uniform Hazardous Waste Manifest to DTSC within 30 days
Q835	22 CCR 12 66262.27(a)	Certification of waste minimization on all manifests
Q836	HSC 6.5 25160.2	Meets all Consolidated Manifest requirements
Waste Determination		
Q367	22 CCR 12 66262.11	Determined if any waste generated is hazardous waste and retained waste analysis
Q850	22 CCR 12 66262.40(c)	Kept records of any test results, waste analyses, or other determinations
Q370	22 CCR 12 66262.34(a)(4); 22 CCR 18 66268.7(a)	Determined land disposal restrictions for hazardous wastes
Q856	HSC 6.5 25144.6 (b)	Properly managed reusable soiled textile materials prior to being sent for laundering
Q857	HSC 6.5 25200.3.1(b)	Laboratory waste managed properly
Q858	HSC 6.5 25200.3.1(c)	Laboratory waste treated properly
Reporting		
Q386	22 CCR 31 67100.7, 67100.8	Prepared a Hazardous Waste Management Performance Report every four years
Q381	22 CCR 31 67100.9	Prepared a Summary Progress Report and submitted it to DTSC every four years
Q385	22 CCR 31 67100.3, 67100.4, 67100.5; HSC 6.5 25244.19, 25244.21	Completed a source reduction report

Q384	22 CCR 12 66262.40(b); 66262.41	Prepared a Biennial Report, submitted to DTSC, and kept for 3 years
Hazardous Waste Management		
Accumulation time limits		
Q388	HSC 6.5 25201(a); 22 CCR 12 66262.34(a)	Disposed of hazardous waste within 90 days of accumulation
Certified Appliance Recycler		
Q843	HSC 6.5 25211.4	Obtained Certified Appliance Recycler Certification (CAR) from DTSC
Q874	HSC 6.5 25211.3, 25212	CAR properly managed all MRSH as hazardous waste
Q844	HSC 6.5 25211.2, 25211.3	CAR maintains documentation regarding removal and management of MRSH from appliances
Container Management		
Q387	22 CCR 12 66262.34(f)	Labeled all containers or portable tanks containing hazardous waste
Q389	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.171	Hazardous waste accumulated in containers that are in good condition
Q390	22 CCR 12 66262.34(a); 22 CCR 15 66265.172	Hazardous waste accumulated in lined or compatible containers
Q391	22 CCR 12 66262.34(a); 22 CCR 15 66265.174	Inspects all hazardous waste containers at least weekly
Q392	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.173	Containers of hazardous waste closed except when adding or removing waste
Q393	22 CCR 15 66265.176	Reactive and ignitable waste containers located at least 50 feet from property line
Q396	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.17(b), 66265.177	Incompatible waste in containers properly managed to prevent a reaction
Q789	22 CCR 11 66261.7	Empty containers > 5 gallons properly managed
Q871	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.178	Meets air emissions requirements for waste in containers
Satellite Accumulation		
Q788	22 CCR 12 66262.34(e)	Met conditions of satellite accumulation regulations
Tank Management		
Q397	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.194	Tanks are compatible with hazardous waste and have spill/overflow prevention provided
Q379	22 CCR 15 66265.192(a)	Obtained a written hazardous waste tank system assessment and kept on file at facility
Q380	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.192(k)	Written hazardous waste tank system assessment meets all requirements
Q842	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.192(h)	Written hazardous waste tank system reassessment completed
Q382	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.192(m)	Obtained approval prior to the replacement of identical/functionally equivalent tank system parts
Q400	22 CCR 12 66262.34 (a)(1); 22 CCR 15 66265.195(a); 22 CCR 15 66265.195(c)	Conducts and documents daily inspections of hazardous waste tank system
Q401	22 CCR 15 66265.193	Secondary containment provided and meets requirements for all hazardous waste tank systems
Q407	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.111, 66265.114, 66265.197	Met all hazardous waste tank system closure requirements
Q410	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.196	Leaking, unfit tank or secondary containment system immediately removed from service
Q383	22 CCR 12 66262.34(a); 22 CCR 15 66265.195(b)	Conducts and documents inspections of cathodic protection systems annually/impressed current bimonthly
Q787	22 CCR 12 66262.34(f)	Stationary tanks labeled as "Hazardous Waste" and marked with accumulation start date
Q872	22 CCR 12 66262.34(a)(1); 22 CCR 15 66265.202	Air emission requirements met
Recyclable Materials		
Q840	HSC 6.5 25143.10	Provided required information for recyclable material to claim the exclusion/exemption

Q868	HSC 6.5 25143.2, 25143.9	Recyclable material qualifies for an exclusion
Used Oil		
Q869	HSC 6.5 25250.7	Does not intentionally contaminate used oil with other hazardous wastes
Q837	HSC 6.5 25250.19(b)(2), 25250.18, 25250.1	Maintains Used Oil Certification Form
Used Oil and Fuel Filters		
Q851	22 CCR 16 66266.130; HSC 6.5 25250.22	Properly manages used oil and fuel filters
Lead Acid Batteries		
Q298	22 CCR 16 66266.81(a)	Generator of more than ten spent lead-acid batteries in a year meets all requirements
Q853	22 CCR 16 66266.81(a)(3)	Accepts and stores 11 or more spent vehicle lead-acid batteries and meets all requirements
Q852	22 CCR 16 66266.81(a)(1)	Handles, stores, or transports more than 10 spent vehicle lead-acid batteries and meets all requirements
Q854	22 CCR 16 66266.81(b)	Properly manages, stores, and labels all damaged lead-acid batteries
Q838	22 CCR 16 66266.81(a)(4)(B)	Disposal documentation for lead batteries retained for three years
Disposal		
Q374	22 CCR 13 66263.41; HSC 6.5 25163(a)	Registered hazardous waste transporter used to transport hazardous waste
Q867	HSC 6.5 25189.5(a), 25201(a)	Disposed of all hazardous waste at an authorized location
Q592	HSC 6.5 25201(a)	Obtained a permit to treat hazardous waste
General Facility Operations		
Site Safety		
Q394	22 CCR 12 66262.34(a)(4); 22 CCR 15 66265.31	Maintains and operates the facility to minimize the possibility of fire/explosion/release
Q395	22 CCR 12 66262.34(a)(4); 22 CCR 15 66265.32	Facility equipped with all required emergency equipment
Q398	22 CCR 12 66262.34(a)(4); 22 CCR 15 66265.33	Tests and maintains all required safety equipment at the facility
Q399	22 CCR 15 66265.35	Maintains adequate aisle space
Q408	22 CCR 15 66265.17(a)	Takes precautions to prevent accidental ignition or reaction of a hazardous waste
Q409	22 CCR 15 66265.14	Entry into active portions of the facility controlled and required signage posted
Q859	22 CCR 12 66262.34(a)(4); 22 CCR 15 66265.55	Emergency coordinator on site or on call
Q873	22 CCR 12 66262.34(a)(1)(B); 22 CCR 15 66265.440 - 66265.445	Complies with drip pad requirements
Universal Waste		
>5000 Kg		
Q323	22 CCR 23 66273.32(b)	UWH who accumulates 5,000 kg or more of non-RCRA UW obtained an EPA ID number from DTSC
Q845	22 CCR 23 66273.32(a)	UWH notified the EPA and obtained a federal ID number prior to accumulating 5,000 kg or more of UW
DTSC notification for Electronic Devices, CRT's and CRT glass		
Q846	22 CCR 23 66273.32(c)	UHW of ED/CRT/glass that does not treat waste, submitted to DTSC all required information
Q847	22 CCR 23 66273.32(d)	UWH that accepts >100kg or generates ≥5000 kg/yr of ED/CRT/glass reported to DTSC annually by Feb 1.
Training		
Q849	22 CCR 23 66273.36	UWH complied with all universal waste training requirements
UW Management		
Q860	22 CCR 23 66273.34	UWH labeled all universal waste and identified type of universal waste
Q861	22 CCR 23 66273.35	UWH accumulates universal waste no longer than one year
Q813	22 CCR 23 66273.2(a), 66273.33(a)	UWH properly manages batteries destined for reclamation or recycling
Q330	22 CCR 23 66273.4, 66273.33(c)	UWH properly manages mercury containing-equipment which is destined for reclamation/recycling

Q331	22 CCR 23 66273.5, 66273.33(b)	UWH properly manages lamps which are destined for reclamation/recycling
Q862	HSC 6.5 25201.16(f)	UWH meets all accumulation and containment standards for universal waste aerosol cans
Q863	HSC 6.5 25201.16(e)	UWH manages universal waste aerosol cans in a manner that prevents fire, explosion, or release
Q866	22 CCR 23 66273.33.5	UWH of electronic devices, CRTs, CRT glass prevents the release of UW to the environment
Shipments and Tracking		
Q864	22 CCR 23 66273.38; 49 CFR 1 172	UWH properly prepares and transfers all universal waste to the appropriate destination facility
W164	22 CCR 23 66273.39	UWH maintained shipment records
Q870	22 CCR 23 66273.31(a), 66273.8(b)	UWH prevented improper disposal of UW and transferred UW to appropriate destination facility
Exports		
Q848	22 CCR 23 66273.40(a)(3) and (4)	UWH sending ED/CRT/glass to any foreign destination completed and submitted required information to DTSC and the CUPA

12/28/2018 AH W:\DATA\FORMS\ARCHIVE\HMC\CHECKLISTS - ALL EC 2018\RCRA LQG CHECKLIST SUMMARY OF VIOLATIONS.DOC

RETURN TO COMPLIANCE STATEMENT

This *Return To Compliance Statement* must be returned to EMD within 19 days of your facility's inspection for Priority Corrective Action violations and within 35 days for all other violations (unless otherwise noted on the Notice To Comply.) Also include copies of any proof of compliance documents (e.g. photos, copies of manifests/disposal records or receipts, or other original paperwork.)

Compliance Certification

1. I certify that the violations noted on the Notice To Comply (and accompanying inspection checklists) have been corrected in the manner indicated below.
2. I have personally examined any attached documentation submitted as proof of compliance and I believe the information to be true, accurate and complete.
3. I am aware that there are significant penalties for submitting false information and/or for non-compliance with violations noted.
4. I declare under penalty of perjury that the foregoing certification is true and correct.

Executed at: _____, California Date: _____

Facility Name: _____ Facility ID# (FA): _____

Signature: _____ Printed Name: _____

Position/Title: _____

SUMMARY OF VIOLATION COMPLIANCE ACTION

Violation Code	Check Type of Evidence Submitted			Violation Code	Check Type of Evidence Submitted			Violation Code	Check Type of Evidence Submitted		
	Photo	Paperwork	Statement		Photo	Paperwork	Statement		Photo	Paperwork	Statement
Q243	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q390	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q867	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q366	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q391	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q592	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q839	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q392	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q394	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q841	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q393	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q395	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q376	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q396	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q398	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q378	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q789	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q399	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q377	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q871	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q408	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q814	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q788	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q409	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q375	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q397	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q859	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q368	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q379	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q873	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q371	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q380	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q323	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q372	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q842	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q845	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q373	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q382	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q846	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q369	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q400	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q847	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q835	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q401	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q849	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q836	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q407	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q860	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q367	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q410	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q861	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q850	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q383	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q813	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q370	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q787	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q330	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q856	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q872	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q331	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q857	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q840	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q862	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q858	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q868	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q863	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q386	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q869	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q866	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q381	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q837	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q864	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q385	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q851	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	W164	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q388	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q298	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q870	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q843	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q853	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q848	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q874	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q852	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q844	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q854	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q387	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q838	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q389	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q374	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Statements: _____

