

Texas Commission on Environmental Quality

CHECKLIST WORKSHEET

IHW IMPORTER OF RECORD

Regulating Entity Name

Date :

Additional I D:

Investigator Name:

Item Number	Description	IMPORTER OF RECORD	Answer	Citations	Notes
Item Number 1	Description	Does the regulated entity generate SQG or greater quantities of wastes on-site? If yes complete applicable generators checklist.	Answer	Citations	Notes
Item Number 2	Description	Is the regulated entity an Importer of Record?	Answer	Citations	Notes
Item Number 3	Description	Has the importer of record completed a hazardous waste determination for each solid waste imported?	Answer	Citations	Notes
Item Number	Description	Check method(s) used for determination	Answer	Citations	Notes
Item Number A	Description	Listed as a hazardous waste in 40 CFR Part 261, Subpart D?	Answer	Citations	Notes
Item Number B	Description	Process or materials knowledge?	Answer	Citations	Notes
Item Number C	Description	Tested for characteristics as identified in Part 261, Subpart C?	Answer	Citations	Notes
Item Number 4	Description	Has the importer documented waste classification determinations on all industrial(including non-hazardous)solid wastes?	Answer	Citations	Notes
Item Number A	Description	Check method(s) used for determination: a. Process or materials knowledge? b. Tested for characteristics as identified in Part 261, Subpart C?	Answer	Citations	Notes
Item Number 5	Description	For each hazardous waste imported, has the importer determined if it is restricted from land disposal?	Answer	Citations	Notes
Item Number 6	Description	For importers and receivers of recyclable materials and non-hazardous recyclable materials subject to the notification requirements of 335.24 or Subchapter H, was notification of the recycling activity provided as required under 335.6(h)?	Answer	Citations	Notes
Item Number	Description	IMPORTER OF RECORD - RECORD KEEPING AND REPORTING: MANIFEST SYSTEM	Answer	Citations	Notes
Item Number 1	Description	Does the importer use waste manifests when shipping Hazardous and Class 1 wastes off-site?	Answer	Citations	Notes

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Item Number 2	Description	Are waste manifests properly completed and signed? For imported wastes from outside the U.S., were the following changes made to the manifest: a. In place of the name, address, and EPA ID number of the foreign generator, was the name, address, and EPA ID number of the importer used? b. In place of the signature on the certification statement by the foreign generator, did the U.S. importer or his agent sign the certification?	
	Answer	Citations 262.23(a)	Notes
Item Number 3	Description	Identify primary off-site disposal/treatment/recycling facilities:	
	Answer	Citations	Notes
Item Number 4	Description	Did the importer designate(on the manifest) a facility which is authorized to receive the waste described on the manifest?	
	Answer	Citations 262.20(b)	Notes
Item Number 5	Description	For shipments of hazardous waste to a designated facility in an authorized State which has not yet obtained authorization to regulate that particular waste as hazardous, did the Importer assure that the designated facility agrees to sign and return the manifest?	
	Answer	Citations 262.23(e)	Notes
Item Number 6	Description	For hazardous and Class 1 wastes imported in Texas and consigned to a TSDF in another state, did the importer use the proper state's manifest?	
	Answer	Citations 335.10(a)(3)	Notes
Item Number 7	Description	Has the importer submitted to the TCEQ an exception report within 45 days if the original (white) copy of the manifest was not received back from TSD?	
	Answer	Citations 335.13(k)	Notes
Item Number 8	Description	Does the facility retain manifests and exception reports for at least three years from the date the waste was accepted by the initial transporter(no longer as required by 335.13(a) & 262.40(d)?	
	Answer	Citations 335.13(k)	Notes
Item Number	Description	IMPORTER OF RECORD - RECORD KEEPING AND REPORTING: WASTE ACTIVITIES	
	Answer	Citations	Notes
Item Number 1	Description	Does the importer keep records of all hazardous waste and industrial solid waste activities in a format which is retrievable and easy to copy?	
	Answer	Citations 335.9(a)(1)	Notes
Item Number 2	Description	If the facility is an unregistered importer or importer of record, have Foreign Waste Shipment Summaries (F1) been completed correctly and submitted on or before the 25th of each month for shipment originating during the previous month from outside the U.S. and transported through Texas to another state?	
	Answer	Citations 335.13(e)	Notes
Item Number 3	Description	Are records of any tests results, waste analyses or other determinations made in accordance with the hazardous waste determination requirements kept for at least three years from the date that the waste was last sent to an on-site or off-site storage, processing or disposal facility?	
	Answer	Citations 262.40(c)	Notes
Item Number 4	Description	Are the following records and reports maintained at the facility for at least three years, if applicable: Foreign Waste Shipment Summaries (F1) for out-of-state or foreign shipment, or for shipments from outside the U.S. and transported through Texas to another state?	
	Answer	Citations 335.13(d)	Notes
Item Number 5	Description	Has the owner or operator submitted, when appropriate, the reports pertaining to releases, fires, and explosions?	
	Answer	Citations 327.5	Notes

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Item Number	Description	Answer	Citations	Notes
	IMPORTER OF RECORD - LDR DETERMINATIONS, TREATMENT AND DISPOSAL			
Item Number	Description	Answer	Citations	Notes
	WASTE IDENTIFICATION AND TESTING			
Item Number 1	Description	Answer	Citations	Notes
	Has the facility operator determined whether restricted wastes or treatment residues exceeded the appropriate treatment standards based on the following.		268.7(a)	
Item Number A	Description	Answer	Citations	Notes
	Knowledge of the waste?			
Item Number B	Description	Answer	Citations	Notes
	Waste determinations?			
Item Number I	Description	Answer	Citations	Notes
	Did the facility test the waste, an extract, or treatment residue to assure compliance with the applicable treatment standards and prohibitions?			
Item Number 2	Description	Answer	Citations	Notes
	Did the facility determine the underlying constituents for wastes that exhibit the characteristics of ignitability, corrosivity, and organic toxicity?		268.7(a)	
Item Number 3	Description	Answer	Citations	Notes
	Prior to placement of waste in a land-based unit or prior to disposal, did the waste meet all applicable treatment standards?		268.40	
Item Number 4	Description	Answer	Citations	Notes
	If the waste or treatment residue is a restricted waste with a delayed effective date, was it placed in a unit that meet all MTRs (unless it meets a specified listed exclusion)?		268.5(h)(2)	
Item Number 5	Description	Answer	Citations	Notes
	If the answer to either Question I immediately above, is no, is the activity authorized by some exemption, a variance from the LDR requirements, a case-by-case extension, or some other authorization?			
Item Number 6	Description	Answer	Citations	Notes
	If yes, explain the authorized activity:			
Item Number	Description	Answer	Citations	Notes
	IMPORTER OF RECORD--RECORD KEEPING AND REPORTING:LAND DISPOSAL RESTRICTIONS			
Item Number 1	Description	Answer	Citations	Notes
	Does importer maintain the following records and reports, if applicable, for three years for and Disposal Restrictions(LDR) documentation.		335.431	
Item Number A	Description	Answer	Citations	Notes
	LDR notices and certifications for restricted wastes sent to off- site TSDs?			
Item Number B	Description	Answer	Citations	Notes
	LDR notices and certifications for wastes meeting treatment standards?			
Item Number C	Description	Answer	Citations	Notes
	Waste analyses used for LDR determinations?			
Item Number D	Description	Answer	Citations	Notes
	All supporting data for LDR determinations made using knowledge of waste?			
Item Number 2	Description	Answer	Citations	Notes
	Were restricted wastes shipped off-site to an authorized TSDF?		270.1(c)	

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Item Number 3	Description	Did the importer or handler provide the following information to each treatment or storage facility?	
	Answer	Citations	268.7(a)(2) Notes
Item Number A	Description	Importer's EPA Hazardous Waste Number?	
	Answer	Citations	Notes
Item Number B	Description	Waste constituents that the treater will monitor, if monitoring will not include all regulated constituents for wastes, F001-F005, F039, D001, D002, D003 and D012-D043?	
	Answer	Citations	Notes
Item Number C	Description	Wastewater or non-wastewater classification, as defined in 268.2(d) and (f)?	
	Answer	Citations	Notes
Item Number D	Description	Sub-category of the waste, if applicable?	
	Answer	Citations	Notes
Item Number E	Description	Manifest number associated with the first shipment of the waste?	
	Answer	Citations	Notes
Item Number F	Description	For hazardous debris, the contaminants subject to treatment and associated statement?	
	Answer	Citations	Notes
Item Number G	Description	Waste analysis data, where available?	
	Answer	Citations	Notes
Item Number 4	Description	For wastes meeting treatment standards, did the importer provide the following information along with the initial waste shipment:	
	Answer	Citations	268.7(a)(3) Notes
Item Number A	Description	EPA Hazardous Waste Number?	
	Answer	Citations	Notes
Item Number B	Description	Waste constituents that will be monitored, if not monitoring for all regulated constituents for waste F001-F005, F039, D001, D002, D003 and D012-D043?	
	Answer	Citations	Notes
Item Number C	Description	Wastewater or non-wastewater classification?	
	Answer	Citations	Notes
Item Number D	Description	Sub-category of the waste, if applicable?	
	Answer	Citations	Notes
Item Number E	Description	Manifest number associated with the shipment of waste?	
	Answer	Citations	Notes
Item Number F	Description	Waste analysis data, where available?	
	Answer	Citations	Notes
Item Number G	Description	Certification?	
	Answer	Citations	Notes
Item Number 5	Description	For restricted wastes being shipped off-site that are subject to an LDR exemption, did the importer submit an appropriate notice to the receiving facility that the waste is not prohibited from land disposal?	
	Answer	Citations	268.7(a)(4) Notes
Item Number 6	Description	If the importer has shipped lab packs off-site, has the appropriate certification accompanied shipments?	
	Answer	Citations	335.431 Notes