

## Texas Commission on Environmental Quality

### CHECKLIST WORKSHEET

IHW UNIVERSAL WASTE SMALL QUANTITY HANDLER CEI

Regulating Entity Name

Date :

Additional I D:

Investigator Name:

<b>Item Number</b>	<b>Description</b>	SECTION A-GENERAL	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number</b>	<b>Description</b>		<b>Notes</b>
		<b>Answer</b>	<b>Citations</b>
<b>Item Number 1</b>	<b>Description</b>	Small Quantity Handler of Universal Waste means a universal waste handler who does not accumulate at any time, 5,000 kilograms or more total of universal waste.	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number 1</b>	<b>Description</b>	Does the facility handle one or more of the following wastes are managed as Universal Waste:	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number A</b>	<b>Description</b>	Batteries [335.261(b)(16)(F)(i) / 273.2 ]	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number B</b>	<b>Description</b>	Pesticides [335.261(b)(16)(F)(ii) / 273.3]	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number C</b>	<b>Description</b>	Thermostats [335.261(b)(16)(F)(iii) / 273.4]	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number D</b>	<b>Description</b>	Lamps [335.261(b)(16)(F)(v) / 273.5]	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number E</b>	<b>Description</b>	Paint and Paint Related Waste [335.261(b)(16)(F)(iv) / 335.262]	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number 2</b>	<b>Description</b>	If Yes, is any evidence present of fires and explosions or other releases to the environment?	
		<b>Answer</b>	<b>Citations</b>
			335.4(1) <b>Notes</b>
<b>Item Number 3</b>	<b>Description</b>	If fires, explosions or other releases have threatened, or could have threatened, human health outside of the facility site, or if the facility had knowledge that a spill had reached surface waters, have these occurrences been reported?	
		<b>Answer</b>	<b>Citations</b>
			327.3 <b>Notes</b>
<b>Item Number 4</b>	<b>Description</b>	If yes, have all releases of universal waste and any other residues from universal waste been contained and been remedied?	
		<b>Answer</b>	<b>Citations</b>
			335.261(a) <b>Notes</b>
<b>Item Number 5</b>	<b>Description</b>	Has the small quantity handler of universal waste determined whether any material resulting from the release is hazardous waste?	
		<b>Answer</b>	<b>Citations</b>
			335.261(b)(23) <b>Notes</b>
<b>Item Number</b>	<b>Description</b>	SECTION B- STANDARDS FOR SMALL QUANTITY HANDLERS	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number</b>	<b>Description</b>	A small quantity handler of universal waste is prohibited from sending or taking universal waste to a place other than another universal waste handler, a destination facility or a foreign destination. [273.18(a)]	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number</b>	<b>Description</b>	The prohibition against treatment is amended to allow the controlled crushing of lamps.	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number 1</b>	<b>Description</b>	Has the small quantity handler disposed of universal waste?	
		<b>Answer</b>	<b>Citations</b>
			273.11(a) <b>Notes</b>

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<b>Item Number</b> 2	<b>Description</b>	Has the small quantity handler diluted or treated universal waste?		
	<b>Answer</b>	<b>Citations</b>	335.261(b)(18)	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	Does the crushing system have an exposure limit of no more than 0.05 mg of mercury per cubic meter through sampling and analysis using OSHA Method ID-140 or Method No. 6008?		
	<b>Answer</b>	<b>Citations</b>	335.261(e)(1)	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b>	Is documentation of the crushing system provided in a written report to the Executive Director?		
	<b>Answer</b>	<b>Citations</b>	335.261(e)(3)	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b>	Has the crushing system received written approval from the executive director? Written approval of the crushing system, from the Executive Director, must be received prior to operation.		
	<b>Answer</b>	<b>Citations</b>	335.261(e)(4)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	WASTE MANAGEMENT		
	<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number</b> 1	<b>Description</b>	Does the small quantity handler of universal waste manage universal waste batteries in a way that prevents releases to the environment?		
	<b>Answer</b>	<b>Citations</b>	273.13(a)	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b>	Does the small quantity handler of universal waste manage universal waste pesticides in a way that prevents releases to the environment?		
	<b>Answer</b>	<b>Citations</b>	273.13(b)	<b>Notes</b>
<b>Item Number</b> 3	<b>Description</b>	Does the small quantity handler of universal waste manage universal waste thermostats in a way that prevents releases to the environment?		
	<b>Answer</b>	<b>Citations</b>	335.261(a)	<b>Notes</b>
<b>Item Number</b> 4	<b>Description</b>	Does the small quantity handler of universal waste manage universal waste lamps in a way that prevents releases to the environment?		
	<b>Answer</b>	<b>Citations</b>	335.261(a)	<b>Notes</b>
<b>Item Number</b> 5	<b>Description</b>	Does the small quantity handler of universal waste manage universal waste paint in a way that prevents releases to the environment?		
	<b>Answer</b>	<b>Citations</b>	335.262	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	Are containers kept closed except when adding or removing waste?		
	<b>Answer</b>	<b>Citations</b>	335.262(c)(2)(	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b>	Are containers in good condition, compatible with the waste and lack evidence of leakage?		
	<b>Answer</b>	<b>Citations</b>	335.262(c)(2)(	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b>	Is universal waste paint managed in tanks? If yes, does the tank system meet the requirements of 265, Subpart J, except for 265.197(c), 265.200 and 265.201?		
	<b>Answer</b>	<b>Citations</b>	335.262(c)(2)(	<b>Notes</b>
<b>Item Number</b> D	<b>Description</b>	Are all containers, multiple containers, tanks or vessels managing universal paint waste clearly labeled or marked with the words "Universal Waste - Paint or Paint Related Wastes"?		
	<b>Answer</b>	<b>Citations</b>	335.262(c)(2)(	<b>Notes</b>
<b>Item Number</b> E	<b>Description</b>	Are applicable requirements under 265.17, 265.176 and 265.177 met for paint and paint related waste that is ignitable, reactive or incompatible?		
	<b>Answer</b>	<b>Citations</b>	335.262(c)(3)	<b>Notes</b>
<b>Item Number</b> F	<b>Description</b>	Has the handler completed a hazardous waste determination and maintained it for at least three years?		
	<b>Answer</b>	<b>Citations</b>	335.262(b)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	LABELING/MARKING		
	<b>Answer</b>	<b>Citations</b>		<b>Notes</b>

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<b>Item Number</b> 1	<b>Description</b>	Are universal waste batteries, or containers in which batteries are managed labeled or marked with any one of the following phrases: "Universal Waste-Battery(ies), or "Waste Battery(ies)," or "Used Battery(ies)"?	
	<b>Answer</b>	<b>Citations</b> 335.261(a)	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b>	Are containers or multiple package units, tanks or vessels in which recalled universal waste pesticides or unused pesticide products labeled or clearly marked with:	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	The label that was on or accompanied the product as sold or distributed, or the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)?"	
	<b>Answer</b>	<b>Citations</b> 273.14(b)	<b>Notes</b>
<b>Item Number</b> 3	<b>Description</b>	Are universal waste thermostats (each thermostat), or a container of thermostats labeled or marked with any one of the following phrases: "Universal Waste-Mercury Thermostat(s)," or "Waste-Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"?	
	<b>Answer</b>	<b>Citations</b> 335.261(a)	<b>Notes</b>
<b>Item Number</b> 4	<b>Description</b>	Are universal waste lamps (each lamp), or a container or package of lamps labeled or marked with any one of the following phrases: "Universal Waste-Lamp(s)," or "Waste-Lamp(s)," or "Used Lamp(s)"?	
	<b>Answer</b>	<b>Citations</b> 273.14(e)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	ACCUMULATION TIME LIMITS	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 1	<b>Description</b>	Has universal waste been accumulated for longer than one year from the date the universal waste is generated, or received from another handler?	
	<b>Answer</b>	<b>Citations</b> 273.15(a)	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b>	If universal waste has been accumulated for longer than one year from the date the universal waste is generated or received from another handler; was this activity solely for the purpose of accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal?	
	<b>Answer</b>	<b>Citations</b> 335.261(a)	<b>Notes</b>
<b>Item Number</b> 3	<b>Description</b>	A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this determination by:	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;	
	<b>Answer</b>	<b>Citations</b> 273.15(c)(1)	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b>	Marking or labeling each individual item of universal waste with the date it became a waste or was received;	
	<b>Answer</b>	<b>Citations</b> 335.261(a)	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b>	Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received;	
	<b>Answer</b>	<b>Citations</b> 335.261(a)	<b>Notes</b>
<b>Item Number</b> D	<b>Description</b>	Maintaining an inventory system on-site that identifies the earliest date each universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;	
	<b>Answer</b>	<b>Citations</b> 273.15(c)(4)	<b>Notes</b>
<b>Item Number</b> E	<b>Description</b>	Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received;	

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		<b>Answer</b>	<b>Citations</b>	273.15(c)(5)	<b>Notes</b>
<b>Item Number</b> F	<b>Description</b>	Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.			
		<b>Answer</b>	<b>Citations</b>	273.15(c)(6)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	EMPLOYEE TRAINING			
		<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number</b> 1	<b>Description</b>	Are all employees who handle or have responsibility for managing universal waste informed of proper handling and emergency procedures appropriate for the type(s) of universal waste handled at the facility?			
		<b>Answer</b>	<b>Citations</b>	273.16	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	OFF-SITE SHIPMENTS			
		<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	If a universal waste handler self-transportes universal waste off-site, the handler becomes a universal waste transporter and must comply with the transportation requirements of 40 CFR 273 Subpart D.			
		<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number</b> 1	<b>Description</b>	Has the small quantity handler of universal waste sent or taken universal waste to a place other than another universal waste handler, destination facility or foreign destination?			
		<b>Answer</b>	<b>Citations</b>	273.18(a)	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b>	Has the small quantity handler of universal waste received a shipment containing hazardous waste which is not universal waste?			
		<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	If yes, has the handler notified the appropriate regional EPA office of the illegal shipment, and provided the name, address and phone number of the originating shipper?			
		<b>Answer</b>	<b>Citations</b>	273.18(a)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	Identify primary off-site facilities:			
		<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	EXPORTS			
		<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number</b> 1	<b>Description</b>	If the handler exported universal waste, was the appropriate notification made to the EPA?			
		<b>Answer</b>	<b>Citations</b>	273.20(b)	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b>	If yes, was a copy of the EPA Acknowledgment of Consent attached to the shipment?			
		<b>Answer</b>	<b>Citations</b>	335.261(a)	<b>Notes</b>