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Texas Commission on Environmental Quality

CHECKLIST WORKSHEET

IHW UNIVERSAL WASTE SMALL QUANTITY HANDLER CEI

Reg Ent Name:

Date:

Add ID:

Investigator Name:

Item No	Description	Answer	Citations	Notes
	SECTION A-GENERAL			
	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.			
1	Does the facility handle one or more of the following wastes are managed as Universal Waste:			
A	Batteries [335.261(b)(16)(F)(i) / 273.2]			
B	Pesticides [335.261(b)(16)(F)(ii) / 273.3]			
C	Thermostats [335.261(b)(16)(F)(iii) / 273.4]			
D	Lamps [335.261(b)(16)(F)(v) / 273.5]			
E	Paint and Paint Related Waste [335.261(b)(16)(F)(iv) / 335.262]			
2	If Yes, is any evidence present of fires and explosions or other releases to the environment?		335.4(3) 26.121 335.4(1) 335.4	
3	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?		327.3 26.266(a)	
4	If yes, have all releases of universal waste and any other residues from universal waste been contained and been remedied?		273.17(a) 335.261(a)	
5	Has the small quantity handler of universal waste determined whether any material resulting from the release is hazardous waste?		273.17(b) 335.261(a) 335.261(b)(23)	
	SECTION B- STANDARDS FOR SMALL QUANTITY HANDLERS			
	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)]			
	The prohibition against treatment is amended to allow the controlled crushing of lamps.			
1	Has the small quantity handler disposed of universal waste?		273.11(a) 335.261(a)	
2	Has the small quantity handler diluted or treated universal waste?		273.11(b) 335.261(b)(18)	
A	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?		335.261(e)(1)	
B	Is documentation of the crushing system provided in a written report to the Executive Director?		335.261(e)(3)	
C	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.		335.261(e)(4)	
	WASTE MANAGEMENT			

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1	Does the small quantity handler of universal waste manage universal waste batteries in a way that prevents releases to the environment?		335.261(a) 273.13(a)	
2	Does the small quantity handler of universal waste manage universal waste pesticides in a way that prevents releases to the environment?		335.261(a) 273.13(b)	
3	Does the small quantity handler of universal waste manage universal waste thermostats in a way that prevents releases to the environment?		273.13(c) 335.261(a)	
4	Does the small quantity handler of universal waste manage universal waste lamps in a way that prevents releases to the environment?		335.261(a) 273.13(d)	
5	Does the small quantity handler of universal waste manage universal waste paint in a way that prevents releases to the environment?		335.262	
A	Are containers kept closed except when adding or removing waste?		335.262(c)(2)(A)	
B	Are containers in good condition, compatible with the waste and lack evidence of leakage?		335.262(c)(2)(B)	
C	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?		335.262(c)(2)(D)	
D	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"?		335.262(c)(2)(F)	
E	Are applicable requirements under 265.17, 265.176 and 265.177 met for paint and paint related waste that is ignitable, reactive or incompatible?		335.262(c)(3)	
F	Has the handler completed a hazardous waste determination and maintained it for at least three years?		335.262(d) 335.262(b)	
	LABELING/MARKING			
1	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)"?		273.14(a) 335.261(a)	
2	Are containers or multiple package units, tanks or vessels in which recalled universal waste pesticides or unused pesticide products labeled or clearly marked with:			
A	The label that was on or accompanied the product as sold or distributed, or the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)?"		273.14(b) 335.261(a) 273.14(c)	
3	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)"?		335.261(a) 273.14(d)	
4	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)"?		335.261(a) 273.14(e)	
	ACCUMULATION TIME LIMITS			
1	Has universal waste been accumulated for longer than one year from the date the universal waste is generated, or received from another handler?		335.261(a) 273.15(a)	
2	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?		273.15(b) 335.261(a)	

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3	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:			
A	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;		335.261(a) 273.15(c)(1)	
B	Marking or labeling each individual item of universal waste with the date it became a waste or was received;		273.15(c)(2) 335.261(a)	
C	Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received;		273.15(c)(3) 335.261(a)	
D	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;		273.15(c)(4) 335.261(a)	
E	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;		335.261(a) 273.15(c)(5)	
F	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.		335.261(a) 273.15(c)(6)	
	EMPLOYEE TRAINING			
1	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?		273.16 335.261(a)	
	OFF-SITE SHIPMENTS			
	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.			
1	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?		273.18(a) 335.261(a)	
2	Has the small quantity handler of universal waste received a shipment containing hazardous waste which is not universal waste?			
A	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?		335.261(a) 273.18(a)	
	Identify primary off-site facilities:			
	EXPORTS			
1	If the handler exported universal waste, was the appropriate notification made to the EPA?		335.261(b)(25) 273.20(b)	
2	If yes, was a copy of the EPA Acknowledgment of Consent attached to the shipment?		273.20(c) 335.261(a)	