

Oklahoma Department of Environmental Quality
VERY SMALL QUANTITY GENERATOR INSPECTION REPORT

EPA ID# _____
 INSPECTION DATE _____

Name of Facility _____ **Owner/Operator** _____ **Phone** _____

Facility Mailing Address _____ **City** _____ **Zip Code** _____ **County** _____

Oklahoma Administrative Code (OAC) 252:205-3-2 adopts by reference certain federal regulations found in Title 40 of the Code of Federal Regulations (40 CFR). This document does not include all state and federal regulations that may be applicable. Certain non-hazardous waste regulations are included on this form as referenced by OAC 252:515.

Regulatory Requirements	Area of Non-compliance	Remarks
A. General Requirements		
A.1. Does the o/o make an accurate HW determination for each solid waste at the point of generation (e.g., before any dilution, mixing, or other alteration of the waste occurs) and at any time during its management when the waste properties have or may have changed such that the RCRA classification of the waste may change? [40 CFR 262.11] (Identify method: <input type="checkbox"/> testing <input type="checkbox"/> knowledge)		
A.2. Does the o/o accumulate at any time ≤ 2.2 lbs of acute HW and ≤ 220 lbs of acute HW-contaminated media/debris? [40 CFR 262.14(a)(3)] If yes, skip to A.3.		
A.2.1. Are all quantities of acute HW held on site for no more than 90 days beginning on the date when the accumulated wastes exceed the amounts provided above? [40 CFR 262.14(a)(3)(i)]		
A.2.2. Do all quantities of acute HW comply with LQG requirements listed in 40 CFR 262.17 (a) through (g)? [40 CFR 262.14(a)(3)(ii)]		
A.3. Does the o/o accumulate at any time < 2,200 lbs of non-acute HW? [40 CFR 262.14(a)(4)] If yes, skip to A.4.		
A.3.1. Are all quantities of that HW held on site for no more than 180 days, or 270 days if applicable, beginning on the date when the accumulated wastes exceed the amounts provided above? [40 CFR 262.14(a)(4)(i)]		
A.3.2. Does the quantity of HW accumulated on site never exceed 6,000 kg (13,200 lbs)? [40 CFR 262.14(a)(4)(ii)]		
A.3.3. Do all quantities of that HW comply with SQG requirements listed in 40 CFR 262.16 (b)(2) through (f)? [40 CFR 262.14(a)(4)(iii)]		
A.4. Does the o/o operate and maintain the facility in a manner to prevent endangerment to public health and the environment? [OAC 252:205-5-4 & 9-1]		
A.5. Does the o/o ensure HW is disposed at a permitted HW disposal facility, or another facility authorized to manage HW from VSQGs? [40 CFR 262.14(a)(5)] (Note: Per 27A O.S. § 2-10-301(G), VSQGs are not authorized to dispose of HW at a solid waste disposal facility in Oklahoma.)		
A.6. Does the o/o ship HW to an LQG for HW consolidation? If no, skip to B.		
A.6.1. Are the o/o and the LQG under the control of the same person as defined in §260.10? [40 CFR 262.14(a)(5)(viii)(A)]		
A.6.2. Does the o/o mark its container(s) of HW with: (1) "Hazardous Waste" [40 CFR 262.14(a)(5)(viii)(B)(1)] (2) An indication of the hazards of the contents (e.g., EPA hazardous waste characteristic(s), DOT hazard label or placard, OSHA hazard statement or pictogram, or NFPA hazard label) [40 CFR 262.14(a)(5)(viii)(B)(2)]		
B. Episodic Generation (Note: only one planned and one unplanned episodic event are allowed per calendar year)		
B.1. Did the o/o only have one episodic event per calendar year? [40 CFR 262.232(a)(1)] If yes, skip to B.2.		
B.1.1. Has the o/o been granted a petition for a second episodic event by DEQ? [40 CFR 262.233(a)]		
B.2. Has the o/o notified the DEQ no later than 30 calendar days prior to initiating a planned episodic event or within 72 hours of the unplanned event? [40 CFR 262.232(a)(2)]		
B.3. Does the o/o have an EPA ID number? [40 CFR 262.232(a)(3)]		
B.4. Does the o/o only accumulate episodic HW in containers and tanks? [40 CFR 262.232(a)(4)]		

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B.5. Does the o/o ensure each container and tank accumulating episodic HW is marked or labeled with the words "Episodic Hazardous Waste"? [40 CFR 262.232(a)(4)(i)(A) & (ii)(A)]		
B.6. Does the o/o ensure each container and tank accumulating episodic HW is marked or labeled with the hazards of the contents (e.g., EPA hazardous waste characteristic(s), DOT hazard label or placard, OSHA hazard statement or pictogram, or NFPA hazard label)? [40 CFR 262.232(a)(4)(i)(B) & (ii)(B)]		
B.7. Does the o/o ensure the date upon which the episodic event began is clearly marked on each container? [40 CFR 262.232(a)(4)(i)(C)]		
B.8. Does the o/o ensure each container of HW is in good condition, compatible with the waste being accumulated, and kept closed except to add or remove waste? [40 CFR 262.232(a)(4)(iii)(A)]		
B.9. Does the o/o identify the date upon which each episodic event begins for each tank by using inventory logs, monitoring equipment or other records? [40 CFR 262.232(a)(4)(ii)(C)]		
B.9.1 Does the o/o keep inventory logs or records with the above information on site and available for inspection? [40 CFR 262.232(a)(4)(ii)(D)]		
B.10. Does the o/o ensure each HW tank is in good condition, compatible with the waste being accumulated, equipped to prevent the overflow, and inspected at least daily? [40 CFR 262.232(a)(4)(iii)(B)]		
B.11. Does the o/o use a manifest when episodic HW is transported off-site and comply with the HW manifest provisions listed in 40 CFR 262.20 to 27? [40 CFR 262.232(a)(5)]		
B.12. Does the o/o ensure episodic HW is manifested and shipped offsite to a designated authorized facility within sixty (60) calendar days from the start of the episodic event? [40 CFR 262.232(a)(6)]		
B.13. Does the o/o maintain the following records for three (3) years from the end date of the episodic event: [40 CFR 262.232(a)(7)] (i) Beginning and end dates of the episodic event; (ii) A description of the episodic event; (iii) A description of the types and quantities of hazardous wastes generated during the event; (iv) A description of how the HW was managed as well as the name of the RCRA-designated facility that received the HW; (v) Name(s) of HW transporters; and (vi) An approval letter from DEQ if the o/o petitioned to conduct one additional episodic event per calendar year.		
C. Used Oil Requirements <i>(Identify each used oil management process conducted & approximate amount stored)</i> <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input type="checkbox"/> Used oil fuel marketer _____ gallons/drums		
<i>Rebuttable Presumption</i>		
C.1. Does the o/o determine the total halogen concentration of used oil generated by the facility? [40 CFR 279.21(b)] <i>(Identify method: <input type="checkbox"/> testing <input type="checkbox"/> knowledge of process)</i>		
C.2. If the total halogen > 1,000 ppm, does the o/o manage the used oil as hazardous waste? [40 CFR 279.21(b)] If yes, skip to C.3.		
C.2.1. Has the o/o demonstrated that the used oil does not contain significant quantities of halogenated hazardous constituents? [40 CFR 279.21(b)] <i>(Note: If no, the used oil must be managed as a hazardous waste)</i>		
<i>Used Oil Storage</i>		
C.3. Does the o/o store used oil in accordance with appropriate Spill Prevention, Control, and Countermeasures requirements (e.g. containment/diversionary structures such as dikes, berms, or retaining walls sufficiently impervious to contain oil; curbing; culverting, gutters, or other drainage systems; weirs, booms, or other barriers; spill diversion ponds; retention ponds; or sorbent materials)? [40 CFR 279.22 → 40 CFR 112.7(c)(1)]		
C.4. Does the o/o store used oil only in tanks, containers, or units subject to regulation under 40 CFR 264/265? [40 CFR 279.22(a)]		
C.5. Does the o/o ensure containers and above-ground tanks storing used oil are in good condition and not leaking? [40 CFR 279.22(b)]		
C.6. Does the o/o ensure containers and above-ground tanks storing used oil are marked with the words "Used Oil?" [40 CFR 279.22(c)(1)]		

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C.7. Does the o/o ensure fill pipes that transfer used oil to underground storage tanks are marked clearly with the words "Used Oil?" [40 CFR 279.22(c)(2)]		
C.8. In the event of a release of used oil, did the o/o perform each of the following: (1) stop the release; (2) contain the released used oil; (3) clean up and properly manage the released used oil and other materials; AND (4) repair or replace any leaking used oil tanks or containers prior to placing them back into service? [40 CFR 279.22(d)] (<i>Identify date and quantity of release, if known</i>)		
<i>On-Site Burning in Space Heaters</i> (<i>Note: Only applies if burning used oil in on-site space heaters</i>)		
C.9. Does the o/o only burn used oil generated by the facility or used oil received from household do-it-yourself used oil generators? [40 CFR 279.23(a)]		
C.10. Is the space heater designed to have a maximum capacity of ≤ 0.5 million BTU/hr? [40 CFR 279.23(b)]		
C.11. Does the o/o ensure heater combustion gasses are vented to the ambient air? [40 CFR 279.23(c)]		
<i>Off-Site Shipments</i> (<i>Choose all methods that apply & complete appropriate checklist sections</i>) <input type="checkbox"/> Self-transportation to appvd collection ctr <input type="checkbox"/> Self-transportation to aggregation point <input type="checkbox"/> Tolling arrangement <input type="checkbox"/> Other		
Self-transport to Collection Center		
C.12. Does the o/o self-transport only used oil generated by the facility or used oil received from household do-it-yourself used oil generators? [40 CFR 279.24(a)]		
C.13. Does the o/o self-transport used oil only in vehicles owned by the facility or a facility employee? [40 CFR 279.24(a)(1)]		
C.14. Does the o/o ensure no more than 55 gallons of used oil is self-transported at any one time? [40 CFR 279.24(a)(2)] If no, must comply with item C.27.		
C.15. Does the o/o ensure the used oil is self-transported to a used oil collection center that is registered, licensed, permitted, or authorized by a state, county, or local government to manage used oil? [40 CFR 279.24(a)(3)]		
Self-transport to Aggregation Point		
C.16. Does the o/o self-transport only used oil generated by the facility? [40 CFR 279.24(b)]		
C.17. Does the o/o self-transport used oil only in vehicles owned by the facility or a facility employee? [40 CFR 279.24(b)(1)]		
C.18. Does the o/o ensure no more than 55 gallons of used oil is self-transported at any one time? [40 CFR 279.24(b)(2)] If no, must comply with item C.27.		
C.19. Does the o/o ensure the used oil is self-transported to an aggregation point that is owned and/or operated by the facility? [40 CFR 279.24(b)(3)]		
Tolling Arrangement		
C.20. Does the tolling arrangement identify the type of used oil and frequency of shipments? [40 CFR 279.24(c)(1)]		
C.21. Does the tolling arrangement state that the vehicle used to transport the used oil to the processor/re-refiner is owned and operated by the processor/re-refiner? [40 CFR 279.24(c)(2)]		
C.22. Does the tolling arrangement state that the vehicle used to transport the recycled oil back to the generator is owned and operated by the processor/re-refiner? [40 CFR 279.24(c)(2)]		
C.23. Does the tolling arrangement state that the reclaimed oil will be returned to the generator? [40 CFR 279.24(c)(3)]		
C.24. Does the o/o comply with the tolling arrangement requirements identified above?		
C.25. Does the o/o ensure the reclaimed used oil is used as a lubricant, cutting oil, or coolant? [40 CFR 279.24(c)]		
Other		
C.26. Does the o/o only use used oil transporters that have an EPA ID number? [40 CFR 279.24]		
C.27. Does the o/o self-transport used oil in quantities ≤ 55 gallons OR only to collection centers/aggregation points identified above? If yes, skip to Sec. D.		
C.27.1. Does the o/o ensure used oil is delivered to ONLY: (1) another used oil transporter that has an EPA ID number; (2) a used oil processing/re-refining facility that has an EPA ID number; (3) an off-specification used oil burner that has an EPA ID number; OR (4) an on-specification used oil burner? [40 CFR 279.43(a)]		

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C.27.2. Does the o/o determine whether the used oil being transported has a total halogen content above or below 1,000 ppm? [40 CFR 279.44(a)]		
C.27.3. Does the o/o maintain records of each used oil shipment? [40 CFR 279.46(a)]		
C.27.4. Do the shipping records contain EACH of the following: (1) the facility name and address; (2) facility EPA ID number; (3) transporter EPA ID number; (4) destination facility EPA ID number; (5) quantity of used oil; (6) signature of the used oil generator and transporter; (7) date of shipment; (8) date of delivery to destination facility; AND (9) signature of destination facility representative? [40 CFR 279.46(a) & (b)]		
C.27.5. Does the o/o maintain shipping records for at least three years? [40 CFR 279.46(d)]		
D. Universal Waste Requirements <i>(Identify each universal waste managed)</i> <input type="checkbox"/> Batteries <input type="checkbox"/> Pesticides <input type="checkbox"/> Mercury-containing equipment <input type="checkbox"/> Lamps <i>(Note: Only applies to Small Quantity Handlers (SQH, < 5,000 kg accumulated at one time). For Large Quantity Handlers (LQH, ≥ 5,000 kg accumulated at any one time) see the applicable requirements of 40 CFR Part 273)</i>		
D.1. Does the o/o ensure containers of universal waste are compatible with the type of universal waste managed in the container? [40 CFR 273.13]		
D.2. Does the o/o label or mark each container of universal waste with the words "Universal Waste __," "Waste __," or "Used __?" [40 CFR 273.14]		
D.3. Does the o/o store universal wastes for less than one year? [40 CFR 273.15(a)] If yes, skip to D.4.		
D.3.1. Is the extended storage time solely to allow the facility to accumulate quantities of universal waste to facilitate proper off-site management? [40 CFR 273.15(b)]		
D.3.2. Did the o/o fully document the need for the extended storage time? [40 CFR 273.15(b)]		
D.4. Is the o/o able to demonstrate the amount of time universal wastes have accumulated (such as through labeling containers, maintaining an inventory system, handling universal wastes separately from other wastes, or another method that clearly identifies the amount of time they have accumulated)? [40 CFR 273.15(c)]		
D.5. Has the o/o provided training to employees in management of universal wastes? [40 CFR 273.16]		
D.6. Has the o/o prevented a release of universal waste or their residues? If yes, skip to D.7.		
D.6.1. Did the o/o immediately contain all releases? [40 CFR 273.17(a)]		
D.6.2. Did the o/o determine if materials resulting from the release are hazardous waste and properly manage, if so? [40 CFR 273.17(b)]		
D.7. Does the o/o ensure universal wastes are shipped only to another universal waste handler, a destination facility, or a foreign destination? [40 CFR 273.18(a)]		
E. Non-Hazardous Waste Management		
E.1. Does the o/o ensure all non-RCRA waste, if disposed in Oklahoma, is disposed at a facility permitted by the DEQ to accept such waste? [27A O.S. §2-10-301(A)(1)]		
E.2. If the o/o disposes of > 10 yd ³ per month of non-hazardous industrial waste (NHIW) at an Oklahoma solid waste disposal facility, complete the following.		
E.2.1. Has the o/o submitted an NHIW notification/certification to the DEQ for each NHIW to be disposed in Oklahoma? [OAC 252:515-31-2(a)]		
E.2.2. Does the notification/certification meet the requirements of OAC 252:515, Appendix G or contain equivalent information? [OAC 252:515-31-3(b)]		

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INSPECTION TYPE (check each that applies)

- Routine RCRA Compliance Evaluation Inspection**
- Limited RCRA Compliance Evaluation Inspection (Circle items inspected)**
- CEI Follow-up (Circle items inspected)**
- Order Follow-up (Case No./Date _____) (Circle items inspected)**
- Citizen Complaint (Complaint # _____)**

Comments:

I have completed an inspection of your facility to evaluate compliance with the Oklahoma Hazardous Waste Management Act (27A O.S. § 2-7-101, *et seq.*), the Oklahoma Hazardous Waste Management regulations (OAC 252:205), the federal hazardous waste management regulations (40 CFR Parts 260 – 279), and certain portions of the Oklahoma Solid Waste Management regulations (OAC 252:515).

- Based on this inspection, it appears your facility is in compliance with all applicable regulations and statutes that were evaluated, and no further action is required. However, if additional review of the facts established during the inspection reveals areas of non-compliance, I will notify you in writing.
- Checklist items marked as “Area of Non-compliance” represent requirements where I have identified the facility to not be in compliance with the applicable statute or regulation. ***Please correct each area of non-compliance and submit documentation to me demonstrating compliance no later than _____.*** If further review of the facts established during this inspection reveals additional areas of non-compliance or that a violation was identified in error, I will notify you in writing. If you believe I have identified an area of non-compliance in error or if additional time is needed, please submit supporting documentation or a request for an extension within this same period.

This Notice in no way limits the DEQ’s authority to pursue additional enforcement such as, but not limited to, an Administrative Order and/or assessment of penalties, based on the nature or gravity of violations found, failure to respond to this Notice, or otherwise in accordance with its statutory authority.

If you have any questions regarding this Notice, please contact me.

(Printed name) _____ (Signature) _____ (Date) _____

Oklahoma Department of Environmental Quality
Land Protection Division
P.O. Box 1677
Oklahoma City, OK 73101-1677
Tel: (405) 702-5100
Fax: (405) 702-5101

Signature of the facility representative if issued onsite (optional):

(Printed name) _____ (Title) _____ (Signature) _____ (Date) _____