

**Oklahoma Department of Environmental Quality
Supplemental Checklist for Hazardous Waste Landfills**

FACILITY _____

EPA ID# _____

DATE _____

Regulatory Requirements	Area of Non-compliance	Remarks
A. General Requirements		
A.1. Does the o/o maintain a run-on control system that prevents flow onto active portions of the landfill during peak discharge from a 25-year storm event? [40 CFR 264.301(g)/265.301(f)]		
A.2. Does the o/o maintain a run-off management system to collect and control at least the water volume resulting from a 24-hour/25-year storm event? [40 CFR 264.301(h)/265.301(g)]		
A.3. Does the o/o ensure collection and holding facilities associated with run-on and run-off control systems are emptied or otherwise managed expeditiously after storms to maintain design capacity of the system? [40 CFR 264.301(i)/265.301(h)]		
A.4. Does the o/o control wind dispersal of particulate matter from the landfill? [40 CFR 264.301(j)/265.301(i)]		
A.5. Does the o/o ensure the landfill is inspected at least weekly to detect (1) problems with the run-on/run-off control systems; (2) wind dispersal control systems; and (3) the presence of leachate in and proper functioning of leachate collection and removal systems? [40 CFR 264.303(b)] (<i>Note: Not required for interim status</i>)		
B. Requirements for Cells with Leak Detection Systems		
B.1. For any landfill disposal cells <i>without</i> final cover and equipped with a leak detection system, does the o/o record the amount of liquid removed from the leak detection system sump at least weekly? [40 CFR 264.303(c)(1)/265.304(a)]		
B.2. For any landfill disposal cells <i>with</i> final cover and equipped with a leak detection system, does the o/o record the amount of liquid removed from the leak detection system sump at least (1) monthly; (2) quarterly if the liquid level is below the level of the sump pump for two consecutive months; or (3) semi-annually if the liquid level is below the level of the sump pump for two consecutive quarters? [40 CFR 264.303(c)(2)/265.304(b)]		
B.3. For any landfill disposal cells <i>with</i> final cover and equipped with a leak detection system, did the o/o return to monthly recording if any of the quarterly or semi-annual evaluations showed water above the level of the sump pump? [40 CFR 264.303(c)(2)/265.304(b)]		
B.4. Does the o/o maintain a response action plan describing actions to be taken if the action leakage rate has been exceeded? [40 CFR 264.304(a)/265.303(a)]		
<p>B.5. If the flow rate into the leak detection system has exceeded the action leakage rate, did the o/o perform EACH of the following: (<i>Identify which standards were met</i>)</p> <p>____ Notify the DEQ within 7 days? [40 CFR 264.304(b)(1)/265.303(b)(1)]</p> <p>____ Submit a preliminary assessment to the DEQ within 14 days of the amount of liquids, likely sources of liquids, possible location, size, and cause of leaks, and short-term actions taken and planned? [40 CFR 264.304(b)(2)/265.303(b)(2)]</p> <p>____ Determine to the extent practical the location, size, and cause of the leak? [40 CFR 264.304(b)(3)/265.303(b)(3)]</p> <p>____ Determine whether waste receipt should cease or be curtailed, waste should be removed from the unit, and whether or not the unit should be closed? [40 CFR 264.304(b)(4)/265.303(b)(4)]</p> <p>____ Determine any other short-term and long-term actions to mitigate or stop leaks? [40 CFR 264.304(b)(5)/265.303(b)(5)]</p> <p>____ Within 30 days, submit a report to the DEQ on the results of the determinations required by 40 CFR 264.304(b)(3), (b)(4), and (b)(5) [or 265.303(b)(3), (b)(4), and (b)(5)]? [40 CFR 264.304(b)(6)/265.303(b)(6)]</p>		
<p>B.6. To make the determinations required by 40 CFR 264.304(b)(3), (b)(4), and (b)(5) [or 265.303(b)(3), (b)(4), and (b)(5)], did the o/o perform ONE of the following: (<i>Identify which standard was met</i>)</p> <p>____ (1) assess the source of liquids and amounts of liquids by source; (2) conduct an analysis of liquids in the leak detection system to identify the source of liquids and possible location of leaks; and (3) assess the seriousness of any leaks in terms of potential for escaping into the environment? [40 CFR 264.304(c)(1)/265.303(c)(1)]</p> <p>OR</p> <p>____ document why such assessments are not needed? [40 CFR 264.304(c)(2)/265.304(c)(2)]</p>		

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C. Surveying and Recordkeeping		
C.1. Does the o/o maintain a map of the exact location and dimensions, including depth, of each cell with respect to permanently surveyed benchmarks? [40 CFR 264/265.309(a)]		
C.2. Does the o/o document the contents of each cell and the approximate location of each hazardous waste type within each cell? [40 CFR 264/265.309(b)]		
D. Special Requirements for Ignitable and Reactive Wastes		
D.1. Does the o/o ensure that the ignitable or reactive wastes meet all applicable requirements of 40 CFR Part 268? [40 CFR 264/265.312(a)]		
D.2. Does the o/o ensure the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste? [40 CFR 264/265.312(a)(1)]		
D.3. Does the o/o ensure disposal of ignitable or reactive wastes is performed in a manner to prevent the generation of extreme heat, pressure, fire/explosion, violent reaction, uncontrolled toxic vapors or dust, uncontrolled flammable fumes, damage to structural integrity, or other problems that threaten human health or the environment? [40 CFR 264/265.312(a)(2) → 264/265.17(b)]		
<i>If no ignitable wastes in containers are disposed in the landfill, skip to D.8.</i>		
D.4. Does the o/o ensure the containers don't leak? [40 CFR 264/265.312(b)]		
D.5. Does the o/o ensure the containers are handled and placed to avoid heat, sparks, rupture, or other conditions to cause ignition? [40 CFR 264/265.312(b)]		
D.6. Does the o/o ensure the containers are covered daily with soil or another non-combustible material? [40 CFR 264/265.312(b)]		
D.7. Does the o/o ensure the containers are not disposed with other wastes that may generate sufficient heat to cause ignition? [40 CFR 264/265.312(b)]		
<i>If no incompatible waste and/or materials are placed in the same landfill cell, skip to Section E.</i>		
D.8. Does the o/o ensure disposal of incompatible wastes and/or materials in the same landfill cell is performed in a manner to prevent the generation of extreme heat, pressure, fire/explosion, violent reaction, uncontrolled toxic vapors or dust, uncontrolled flammable fumes, damage to structural integrity, or other problems that threaten human health or the environment? [40 CFR 264/265.313 → 264/265.17(b)]		
E. Special requirements for liquid wastes		
E.1. Does the o/o prevent the disposal of bulk or non-containerized liquids? [40 CFR 264/265.314(a)]		
E.2. Does the o/o prevent the disposal of containers holding free liquids? [40 CFR 264.314(c)/265.314(b)] If yes, skip to E.3.		
E.2.1. Is the container: (1) very small, such as an ampule; (2) designed to hold free liquids for other than storage (such as a battery or capacitor); or (3) a lab pack? [40 CFR 264.314(c)/265.314(b)]		
E.3. Does the o/o ensure sorbents used to treat free liquids are nonbiodegradable? [40 CFR 264.314(d)/265.314(e)]		
F. Special Requirements for Containers (Note: The following does not apply to very small containers, such as ampules)		
F.1. Does the o/o ensure all containers placed in the landfill are EITHER: (1) at least 90% full; OR (2) crushed, shredded, or similarly reduced in volume to the maximum extent possible? [40 CFR 264/265.315]		
G. Special Requirements for Lab Packs		
G.1. Does the o/o ensure the lab packs are placed in non-leaking inside containers? [40 CFR 264/265.316(a)]		
G.2. Does the o/o ensure the inside containers are designed and constructed of materials that will not react with, decompose, or be ignited by the contained waste? [40 CFR 264/265.316(a)]		
G.3. Does the o/o ensure the inside containers are tightly and securely sealed? [40 CFR 264/265.316(a)]		
G.4. Does the o/o ensure the inside containers meet DOT specifications? [40 CFR 264/265.316(a)]		
G.5. Does the o/o ensure the inside containers are overpacked in an open head, DOT-specification, metal shipping container? [40 CFR 264/265.316(b)]		
G.6. Does the o/o ensure the metal shipping container is ≤ 110 gallons capacity? [40 CFR 264/265.316(b)]		

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G.7. Does the o/o ensure the inside container is surrounded by a sufficient quantity of non-biodegradable sorbent material to completely absorb all of the liquid contents of the inside containers? [40 CFR 264/265.316(b)]		
G.8. Does the o/o ensure the sorbent material used is not capable of reacting dangerously with, being decomposed by, or being ignited by the contents of the inside containers? [40 CFR 264/265.316(c)]		
G.9. Does the o/o ensure the metal outer container is full when packed with the inside containers and sorbent material? [40 CFR 264/265.316(b)]		
G.10. Does the o/o ensure incompatible wastes are not placed in the same outside container? [40 CFR 264/265.316(d)]		
G.11. Does the o/o ensure reactive wastes are treated or rendered non-reactive prior to packaging? [40 CFR 264/265.316(e)] (<i>Note: Cyanide- or sulfide-bearing wastes are not subject to this requirement</i>)		
G.12. Does the o/o ensure disposal of these wastes is performed in compliance with 40 CFR Part 268? [40 CFR 264/265.316(f)]		
H. Special Requirements for Landfill Disposal of F020, F021, F022, F023, F026, & F027 Wastes (<i>Note: These wastes may not be disposed in interim status landfills</i>)		
H.1. Has the DEQ approved a management plan for these wastes? [40 CFR 264.317(a)]		
H.2. Does the o/o operate the landfill in accordance with this approved management plan? [40 CFR 264.317(a)]		
H.3. If the DEQ has specified any additional design, operating, and monitoring requirements for managing these wastes, does the o/o comply with all of the additional requirements? [40 CFR 264.317(b)] (<i>Identify any deficiencies</i>)		