



VERY SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/11/2020
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section A: Notification and Category Determination

A.01: The generator determined its generator category.		662.013

Section B: Waste Determination

B.01: Generator accurately determined if their solid waste is also a hazardous waste.		662.011

B.02: No diluting, mixing or alteration of the waste occurred prior to making the waste determination.		662.011(1)

B.03: The generator determined whether their solid waste is excluded from regulation under s. NR 661.0004.		662.011(2)

B.04: Generator accurately determined if any P, U, K, or F code(s) apply to their hazardous waste.		662.011(3)

B.05: Generator accurately determined if any D code(s) apply to their hazardous.		662.011(4)

Section C: Waste Disposition

C.01: If hazardous waste is shipped off-site to an out-of-state facility, the hazardous waste is delivered to a permitted facility.		662.014(1)(e)

C.02: If hazardous waste is shipped off-site to a Wisconsin facility, the hazardous waste is delivered to a permitted facility.		662.014(1)(f)

C.03: Hazardous wastes are not disposed on-site without a license issued under chapter NR 670. Note that this is a statutory violation.		291.25(2)

C.04: Hazardous wastes are not thermally treated (e.g., burning, detonation, evaporation) on-site without a license issued under chapter NR 670.		291.25(2)

C.05: The generator allowed bulk or non-containerized liquid hazardous waste or hazardous waste containing free liquids to be placed into a landfill.		662.014(2)

Section D: Manifests

D.01: The generator uses a uniform hazardous waste manifest to ship hazardous waste. If NO, go to Section E.		

D.02: Paper manifest: If a generator that transports or offers for transport a hazardous waste for off-site treatment, storage, or disposal and chooses to use a paper manifest, the paper manifest was prepared using the uniform hazardous waste manifest on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A.		662.020(1)(a)



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Section D: Manifests

D.03: If the generator uses an electronic manifest, the generator complies with s. NR 662.024 and 40 CFR 3.10.		662.020(1)(c)
D.04: The generator designated at least one facility that is permitted to handle the manifested waste.		662.020(2)
D.05: The generator designated an alternate facility or instructed the transporter to return the waste if the transporter was unable to deliver the waste.		662.020(4)
D.06: All manifest: The generator signed the paper manifest certification by hand or if an electronic manifest is used the electronic signature complies with s. NR 662.025 (s. NR 662.024(1)(a)).		662.023(1)(a)
D.07: The manifest had a handwritten signature and a date of acceptance from the initial transporter. An electronic manifest can be signed according to s. NR 662.024(1)(a).		662.023(1)(b)
D.08: The generator retained a copy of the manifest in compliance with ss. NR 662.040(1) and 662.024(3).		662.023(1)(c)
D.09: The generator gave the remaining copies of the manifest to the transporter.		662.023(2)
D.10: The generator complied with manifest requirements when sending bulk shipments within the United States solely by water.		662.023(3)
D.11: The generator complied with manifest requirements when sending shipments within the United States by rail.		662.023(4)
D.12: The generator complied with manifest requirements when sending hazardous waste to a state not authorized to regulate the waste.		662.023(5)
D.13: The generator signed the manifest according to the requirements when a shipment was rejected and returned to the generator.		662.023(6)(a)
D.14: A copy of the manifest was given to the transporter when a shipment was rejected and returned to the generator.		662.023(6)(b)
D.15: A copy of the manifest was sent within 30 days to the designated facility that returned the hazardous waste to the generator.		662.023(6)(c)
D.16: The generator retained a copy of the returned shipment manifest for three years.		662.023(6)(d)
D.17: The generator submitted an exception report to the department if a copy of the manifest was not received in 35 days from the designated facility.		662.042(2)
D.18: The generator keeps a copy of the signed manifest for three years in accordance with s. NR 662.023(1).		662.040(1)



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Section E: Manifest Review

E.01: The EPA ID number in box 1 correct.		662.020(1)(a)
E.02: The total number of pages used to complete the manifest in box 2 is correct.		662.020(1)(a)
E.03: The emergency response phone number in box 3 is correct.		662.020(1)(a)
E.04: The generator's mailing address, phone number, and site address in box 5 is correct.		662.020(1)(a)
E.05: The transporter's company name and U.S. EPA ID number in box 7 (and 7 if needed) is correct.		662.020(1)(a)
E.06: The designated facility's name, site address, and U.S. EPA ID number in box 8 is correct.		662.020(1)(a)
E.07: The 'X' used to identify hazardous materials in box 9a is used correctly. 1. The letters 'RQ' may be used instead 'X' if a reportable quantity needs to be identified (49 CFR 172.201(a)(1)(iii)).		662.020(1)(a)
E.08: The U.S. DOT proper shipping name, hazard class or division, identification number (UN/NA) and packing group in box 9b is correct.		662.020(1)(a)
E.09: The number of containers in box 10 is correct.		662.020(1)(a)
E.10: The type of containers in box 10 is correct.		662.020(1)(a)
E.11: The total quantity of waste in box 11 is correct.		662.020(1)(a)
E.12: The unit of measurement in box 12 is correct.		662.020(1)(a)
E.13: The waste code information in box 13 is correct.		662.020(1)(a)
E.15: The signature for the 'Generator's Certification' in box 15 is signed by someone the who has had the DOT training requirements under 49 CFR Part 172, Subpart H.		

Section F: On-Site Storage in Containers

F.01: A. Generator accumulates hazardous in containers. If NO, go to Section G.		
F.02: Hazardous waste containers are in good condition.		665.0171



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Section F: On-Site Storage in Containers

F.03: Hazardous waste containers are appropriate for the waste being contained.		665.0172
F.04: Hazardous waste containers are kept closed unless adding or removing waste, or for opening of a safety device.		665.0173(1)
F.05: Incompatible wastes are not placed on the same container.		665.0177(1)
F.06: The hazardous waste containers are marked with the words "Hazardous Waste".		662.014(4)

Section G: On-Site Storage in Tanks.

G.01: Generator accumulates hazardous in tanks. If NO, go to Section H.		
G.02: The tanks are leak-proof and in good overall condition.		662.014(5)(a)
G.03: The tanks are made or lined with materials that will not react with or be incompatible with the hazardous waste being stored.		662.014(5)(b)
G.04: Incompatible waste and materials are not placed in the same tank.		662.014(5)(c)
G.05: The tank is marked with the words "Hazardous Waste".		662.014(5)(d)
G.06: If the tank begins to leak, the contents of the tank shall be immediately removed and placed into leak proof containers or tanks. All spilled material shall be cleaned up and properly managed.		662.014(5)(e)

Section H: VSQG Waste Consolidation

H.01: VSQG sends hazardous waste to an off-site LQG under the VSQG's control. If NO, go to Section I.		
H.02: The containers are marked with the words "Hazardous Waste".		662.014(1)(e)8.c.
H.03: The hazardous waste containers are marked with an indication of the hazards of the hazardous waste.		662.014(1)(e)8.c.



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Section I: Episodic Event

I.01: The VSQG has had an episodic event. If NO, go to Section J.		
I.02: The generator notifies the department at least 30 calendar days prior to initiating a planned episodic event using EPA Form 8700-12.		662.232(1)(b)
I.03: The generator notifies the department at within 72 hours of an unplanned episodic event using EPA Form 8700-12.		662.232(1)(b)
I.04: The generator has an EPA identification number or obtain an EPA identification number using EPA Form 8700-12.		662.232(1)(c)
I.05: Hazardous waste is not accumulated on drip pads or containment buildings.		662.232(1)(d)
I.06: The hazardous waste containers are marked with the words "Episodic Hazardous Waste".		662.232(1)(d)1.a.
I.07: The hazardous waste containers are marked with an indication of the hazards of the hazardous waste.		662.232(1)(d)1.b.
I.08: The date upon which the episodic event began is clearly visible for inspection on each container.		662.232(1)(d)1.c.
I.09: The hazardous waste tanks are marked with the words "Episodic Hazardous Waste".		662.232(1)(d)2.a.
I.10: The hazardous waste tanks are marked with an indication of the hazards of the hazardous waste.		662.232(1)(d)2.b.
I.11: The date upon which the episodic event began is documented in inventory logs, monitoring equipment, or other records, and is readily available for inspection.		662.232(1)(d)2.c.
I.12: The tank inventory logs or records are retained on-site and are readily available for inspection.		662.232(1)(d)2.c.
I.13: Hazardous waste is managed in a manner that minimizes the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to the air, soil, or water.		662.232(1)(d)3.
I.14: The hazardous waste container is in good condition.		662.232(1)(d)3.a
I.15: The hazardous waste container is compatible with the waste.		662.232(1)(d)3.a
I.16: The hazardous waste container is always be closed during storage, except when it is necessary to add or remove waste.		662.232(1)(d)3.a
I.17: The tank is leak proof and in good overall condition.		662.232(1)(d)3.b



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Section I: Episodic Event

I.18: The tank is made or lined with materials that will not react with or be incompatible with the hazardous waste being stored.		662.232(1)(d)3.b
I.19: The generator has procedures in place to prevent an overflow of the tank.		662.232(1)(d)3.b
I.20: The tank is inspected at least once each operating day.		662.232(1)(d)3.b
I.21: Episodic hazardous waste is manifested off-site.		662.232(1)(e)
I.22: Episodic hazardous waste is manifested off-site with in 60 days.		662.232(1)(f)
I.23: The beginning and end dates of the episodic event are maintained as a record for 3 years.		662.232(1)(g)(1)
I.24: A description of the episodic event is maintained as a record for 3 years.		662.232(1)(g)(2)
I.25: A description of the types and quantities of hazardous wastes generated during the event are maintained as a record for 3 years.		662.232(1)(g)(3)
I.26: A description of how the hazardous waste was managed as well as the name of the RCRA-designated facility that received the hazardous waste are maintained as a record for 3 years.		662.232(1)(g)(4)
I.27: The name(s) of hazardous waste transporters are maintained as a record for 3 years.		662.232(1)(g)(5)
I.28: An approval letter from the department for an additional episodic event.		662.232(1)(g)(6)
I.29: Petition included reasons for the second event.		662.233(2)(a)
I.30: Petition included estimated amount of hazardous waste.		662.233(2)(b)
I.31: The petition for the second episodic event included how the hazardous waste is to be managed.		662.233(2)(c)
I.32: Petition included estimated length of time—not to exceed 60 days		662.233(2)(d)
I.33: The petition for the second episodic event included information regarding the previous episodic event.		662.233(2)(e)
I.34: The petition for the second episodic event was made to the department in writing, either on paper or electronically.		662.233(3)



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Section I: Episodic Event

I.35: The generator retains written approval in its records for 3 years from the date the second episodic event ended.		662.233(4)

Section J: Used Oil

A. General

J.01: Used oil is managed on-site. If NO, go to Section K.		

J.02: Generator meets ch.NR 664 or 665 requirements if storing used oil in waste piles or surface impoundments.		679.12(1)

J.03: Used oil is not used as a dust suppressant.		679.12(2)

J.04: Off-spec used oil burned for energy recovery is only burned in required devices.		679.12(3)

J.05: Used oil container and tanks are in good condition.		679.22(2)(a)

J.06: The used oil containers are not leaking.		679.22(2)(b)

J.07: Used oil container or tank is labeled "Used Oil".		679.22(3)(a)

J.08: The used oil tank is in good condition (no severe rusting, apparent structural defects or deterioration).		679.22(2)(a)

J.09: The used oil tank is not leaking.		679.22(2)(b)

J.10: The used oil tank is marked with the words "Used Oil".		679.22(3)(a)

J.11: The fill pipe to the underground storage tank is labeled "Used Oil".		679.22(3)(b)

B. Release to the Environment

J.12: The generator stopped any release of used oil to the environment.		679.22(4)(a)

J.13: The generator contained any release of used oil.		679.22(4)(b)

J.14: The generator cleaned up and managed any release of used oil and materials.		679.22(4)(c)



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Section J: Used Oil

B. Release to the Environment

J.15: The generator repaired or replaced any leaking used oil container or tank prior to use.		679.22(4)(d)

C. Used Oil Burning

J.16: Generator only burns self-generated or household do-it-yourselfer used oil in used oil space heater.		679.23(1)

J.17: Used oil space heater maximum capacity is not more than 0.5 million Btu per hour.		679.23(2)

J.18: The used oil-fired space heater's combustion gases are vented to the ambient air.		679.23(3)

D. Used Oil Transport

J.19: The used oil transporter has an EPA identification number.		679.24

J.20: Collection Centers: Self-generated and household do-it-yourselfer used oil is transported by a vehicle owned by the generator or the generator's employee.		679.24(1)(a)

J.21: Collection Centers: Generator self-transport no more than 55 gallons at one time.		679.24(1)(b)

J.22: Aggregation Points: The generator may only self-transport used oil in a vehicle that is owned by the generator or owned by an employee of the generator.		679.24(2)(a)

J.23: Aggregation Points: The generator transports no more than 55 gallons of used oil at any time.		679.24(2)(b)

J.24: Aggregation Points: The generator transports the used oil to an aggregation point that is owned or operated by the same generator.		679.24(2)(c)

J.25: The generator's used oil aggregation points comply with the subchapter C standards of chapter NR 679.		679.24(2)(c)

J.26: Tolling arrangement: When a generator uses a tolling agreement, the agreement includes the type of used oil and frequency of shipments.		679.24(3)(a)

J.27: Tolling arrangement: When a generator uses a tolling agreement, the agreement includes that the vehicle used is owned and operated by the used oil processor or re-refiner.		679.24(3)(b)

J.28: Tolling arrangement: When a generator uses a tolling agreement, the agreement includes that the used oil will be returned to the generator.		679.24(3)(c)



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Section K: Universal Waste

A. General

K.01: The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs.). If NO go to Section M. Note: If the facility is a large quantity handler then complete the large quantity handler of universal waste inspection form.		
K.02: The handler does not dispose of their universal waste. This is also a violation of section 2.C., which is a statutory violation of s. 291.25(2) Wis. Stats.		673.11(1)
K.03: The handler does not dilute or treat universal waste.		673.11(2)
K.04: The handler does not accumulate universal waste for longer than one year.		673.15(1)
K.05: The handler is able to demonstrate the length of time the universal waste has been accumulated.		673.15(3)
K.06: Employees who manage universal waste are trained.		673.16
K.07: The handler immediately contains all releases of universal wastes.		673.17(1)
K.08: The handler determines whether any release of a universal waste is hazardous waste.		673.17(2)
K.09: The handler manages hazardous waste generated from the release of a universal waste in compliance with all applicable requirements of chapters NR 660 to 670.		673.17(2)
K.10: Universal waste is sent or taken to another universal waste handler, destination facility or foreign destination.		673.18(1)
K.11: The handler complies with the transporter requirements of subchapter D of chapter NR 673 Wis. Adm. Code while self-transporting the universal waste.		673.18(2)
K.12: The handler packages, labels, marks and placards the shipment, and prepares the proper shipping papers in accordance with the applicable U.S. Department of Transportation regulations under 49 CFR parts 172 to 180.		673.18(3)
K.13: The originating handler ensures that prior to sending a shipment of universal waste to another universal waste handler the receiving handler agrees to receive the shipment of the universal waste.		673.18(4)
K.14: If a shipment of universal waste was rejected, the waste was returned or sent to another destination facility.		673.18(5)
K.15: Universal waste was rejected and returned or sent to another destination facility.		673.18(6)
K.16: If the facility receives hazardous waste instead of universal waste, the department is notified.		673.18(7)



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Section K: Universal Waste

A. General

K.17: If the facility received waste that is non-hazardous and non-universal, the waste is managed with federal or local solid waste regulations.		673.18(8)
K.18: A small quantity handler of universal waste who sends universal waste to a foreign destination is subject to the requirements of subch. H of ch. NR 662.		673.20

B. Lamps

K.19: The facility is a handler of universal waste lamps. If NO, go to R.24 (universal waste batteries).		
K.20: The handler manages universal waste lamps in a manner that prevent releases of any universal waste or component of a universal waste to the environment.		673.13(4)
K.21: The handler contains any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps.		673.13(4)(a)
K.22: The handler immediately cleans up and places in a container any lamp that is broken and any lamp that shows evidence of breakage, leakage, or damage.		673.13(4)(b)
K.23: The handler clearly labels or marks each lamp or a container or package in which the lamps are contained with any of the following phrases: "Universal Waste - Lamps", "Waste Lamps" or "Used Lamps."		673.14(5)

C. Batteries

K.24: The facility is a handler of universal waste batteries. If NO, go to R.30 (universal waste pesticides).		
K.25: The handler manages batteries in a manner that prevent releases of any universal waste to the environment.		673.13(1)
K.26: The handler contains any battery that showed evidence of leakage, spillage, or damage in a container.		673.13(1)(a)
K.27: The handler's actions did not caused a breach to the casing of an individual battery cell.		673.13(1)(b)
K.28: The handler who removes electrolytes from batteries, or who generates other solid wastes (e.g., battery pack materials, discarded consumer products) as a result of the activities listed in s. NR 673.13(1)(b), determined whether the electrolytes or other solid wastes exhibits a characteristic of hazardous waste.		673.13(1)(c)
K.29: The handler clearly labels or marks each battery or a container in which the batteries are contained with one of the following phrases: "Universal Waste - Batteries", "Waste Batteries" or "Used Batteries."		673.14(1)

D. Pesticides

K.30: The facility is a handler of universal waste pesticides. If NO, go to K.37 (universal waste mercury containing equipment).		
R.31: The handler manages the pesticides in a way that prevents releases.		673.13(2)



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Section K: Universal Waste

D. Pesticides

K.32: The handler manages pesticides in a way that prevents releases of any universal waste to the environment.		673.13(2)
K.33: The label that was on the pesticides when purchased are on any recalled pesticides.		673.14(2)(a)
K.34: Recalled pesticides are marked "Universal Waste-Pesticides" or "Waste-Pesticides".		673.14(2)(b)
K.35: The handler clearly labels or marks each container, tank, transport vehicle, or vessel in which unused pesticides are contained with the label that was on the product if still legible. If using the product labels is not feasible, then label as required.		673.14(3)(a)
R.36: Containers, tanks, transport vehicles are marked "Universal Waste - Pesticides" or "Waste - Pesticides".		673.14(3)(b)

E. Mercury-Containing Equipment

K.37: The facility is a handler of universal waste mercury containing equipment. If NO, go to section L.		
K.38: The handler manages mercury-containing equipment in a way that prevents releases to the environment.		673.13(3)
K.39: The handler places in a container any mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leakage in a container.		673.13(3)(a)
K.40: The handler removed mercury-containing ampules from mercury-containing equipment in a manner designed to prevent breakage of the ampules.		673.13(3)(b)1.
K.41: The handler removes mercury-containing ampules from mercury-containing equipment only over or in a containment device (e.g., tray or pan sufficient to collect and contain any mercury released from an ampule in case of breakage).		673.13(3)(b)2.
K.42: The handler removes mercury-containing ampules from mercury-containing equipment only when there is a mercury clean-up system to immediately transfer any mercury resulting from spills or leaks from broken ampules, from the containment device to a container that meets the requirements of s. NR 662.0015 or 662.016.		673.13(3)(b)3
K.43: The handler removing mercury-containing ampules from mercury-containing equipment is able to immediately transfer any released mercury from the containment device to a container that meets the requirements of s. NR 662.015 or 662.016.		673.13(3)(b)4.
K.44: The area where the mercury-containing ampules are removed from the mercury-containing equipment is provided with ventilation and monitoring to ensure compliance with applicable exposure levels for mercury adopted under 29 USC 651 to 678 or s. 101.055, Stats.		673.13(3)(b)5.
K.45: The employees removing mercury-containing ampules from mercury-containing equipment are thoroughly familiar with proper waste mercury handling and emergency procedures, including transfer of mercury from containment devices to appropriate containers.		673.13(3)(b)6.
K.46: The handler removing mercury-containing ampules from mercury-containing equipment stores the removed ampules in closed, non-leaking containers that are in good condition.		673.13(3)(b)7.
K.47: The handler removing mercury-containing ampules from mercury-containing equipment packs the removed ampules in the container with packing materials that are adequate to prevent breakage during storage, handling, and transportation.		673.13(3)(b)8.



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Section K: Universal Waste

E. Mercury-Containing Equipment

K.48: The handler of mercury-containing equipment that does not contain an ampule (e.g., such as a barometer or manometer) immediately seals the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment.		673.13(3)(c)1.
K.49: The handler of mercury-containing equipment that does not contain an ampule (e.g., such as a barometer or manometer) follows all requirements for removing ampules and managing removed ampules under s. NR 673.13(3)(b).		673.13(3)(c)2.
K.50: The handler removing mercury-containing ampules from the mercury-containing equipment or seals the mercury from mercury-containing equipment determines if the mercury or clean-up residues resulting from spills or leaks exhibit a characteristic of hazardous waste identified in subchapter C of chapter NR 661.		673.13(3)(d)1.a.
K.51: The handler removing mercury-containing ampules from mercury-containing equipment or seals mercury from mercury-containing equipment determines if other solid waste generated as a result of the removal of mercury-containing ampules or housings exhibit a characteristic of hazardous waste identified in subchapter C of chapter NR 661.		673.13(3)(d)1.b.
R.52: The handler removing mercury-containing ampules from mercury-containing equipment or seals mercury from mercury-containing equipment manages all of the mercury, residues, or other solid waste that exhibited a characteristic of hazardous waste in compliance with all applicable requirements of chapters NR 660 to 670. The handler is considered the generator of the mercury, residues or other waste and shall manage it subject to chapter NR 662.		673.13(3)(d)2.
K.53: The handler removing mercury-containing ampules from mercury-containing equipment or seals mercury from mercury-containing equipment in its original housing manages all of the mercury, residues, or other solid waste that did not exhibit a characteristic of hazardous waste in compliance with chapters 287 and 289, Stats., chapters NR 500 to 524, and applicable federal solid waste regulations.		673.13(3)(d)3.
K.54: The handler clearly labels or marks each mercury-containing equipment (i.e., each device), or container with any of the following phrases: "Universal Waste - Mercury-Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment."		673.14(4)(a)
K.55: The handler clearly labels or marks each mercury-containing thermostat or container containing only mercury-containing thermostats with any of the following phrases: "Universal Waste - Mercury Thermostats," "Waste Mercury Thermostats" or "Used Mercury Thermostats."		673.14(4)(b)

Section L: Exclusions

L.01: Hazardous waste is sewered as required.		291.21(9)
L.02: Solvent-contaminated wipes sent for laundering are managed as required.		291.21(9)
L.03: Solvent-contaminated wipes that are disposed are managed as required.		291.21(9)

Section M: Generator Status Evaluation

M.01: Inspection shows that the VSQG generation rates and accumulation limit are met.		
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Section M: Generator Status Evaluation

M.02: Is the facility is operating under subchapter K academic laboratory?		
M.03: Is the facility transporting universal waste?		
M.04: Is the facility treating, disposing, or recycling a universal waste?		
M.05: Is the facility operating a used oil collection center or aggregation point?		
M.06: Is the facility operating as a used oil processor or re-refiner?		
M.07: Is the facility burning for energy recovery off-spec used oil from off-site?		
M.08: Is the facility transporting used oil?		
M.09: Is the facility sending off-spec used oil to a used oil burner or claims that used oil can be burned for energy recovery?		
M.10: Is the facility a permanent household hazardous waste and VSQG collection site?		
M.11: Describe any other activities not identified in this form.		