This audit checklist will help you evaluate your healthcare facility’s compliance with hazardous waste small quantity generator (SQG) requirements. Its use is strictly voluntary and you are not required to submit the results of your audit to the Wisconsin Department of Natural Resources (DNR).

Hazardous waste is a specific set of wastes, defined by the U.S. Environmental Protection Agency (EPA) and the DNR as hazardous because their chemical properties and toxicity can harm human health and the environment. For more on which wastes are hazardous, see dnr.wi.gov search “hazardous waste” or ch. NR 661, Wis. Adm. Code.

Hazardous waste generators have certain requirements to follow while waste accumulates on-site, and when the waste is treated on-site or shipped off-site to a hazardous waste facility.

The requirements that apply to your facility depend on the type and quantity of waste generated and your classification as a very small, small or large quantity generator of hazardous waste (VSQG, SQG or LQG, respectively). See the box for more details. The generator requirements are in ch. NR 662, Wis. Adm. Code.

**Completing this audit**

The beginning of each section of this audit checklist includes an action list and a general description of each specific SQG requirement. Each of the questions is a code requirement; the code citation for the requirement is given after the question.

You may use one audit checklist for the entire facility or one for each department generating hazardous waste. Remember to determine generator status by calculating the **total** amount of waste generated at the facility.

The first step in completing an audit is to determine the quantity of hazardous waste your facility generates. Remember that the generation rate is determined by adding the quantities of all hazardous wastes generated in all departments at the facility in any given month.

Chemotherapy wastes, radiological wastes and infectious wastes that are also hazardous wastes should be counted when determining generator status, along with hazardous waste generated by cleaning up spills. A worksheet for calculating the total amount of hazardous waste generated at your facility is attached to this audit checklist.

Once you have determined your facility is an SQG of hazardous waste, proceed with this audit checklist. If your facility is not an SQG, complete the VSQG or LQG checklist, whichever is appropriate. The VSQG checklist is available at https://dnr.wi.gov/files/pdf/pubs/wa/wa1265.pdf. The LQG checklist is available at https://dnr.wi.gov/files/pdf/pubs/wa/wa1263.pdf.

Questions with a “NO” answer indicate a discrepancy with Wisconsin’s hazardous waste rules, and you will need to take follow-up actions to correct the discrepancy.
# Self-Audit Checklist for Healthcare Facilities
## Small Quantity Generators

### Section A: Inspection Information

<table>
<thead>
<tr>
<th>Name of Healthcare Facility</th>
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<table>
<thead>
<tr>
<th>Street Address</th>
<th>City</th>
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<table>
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<tr>
<th>Date of Audit</th>
<th>Name of Auditors</th>
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<table>
<thead>
<tr>
<th>Personnel Interviewed During Audit</th>
<th>Title and Department</th>
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### Section B: Waste Information

The generator of solid waste must determine if the solid waste is a hazardous waste by applying knowledge of the waste or conducting a waste analysis. Generator knowledge can be based on sources such as Material Safety Data Sheets (MSDS) or other reliable information, such as analysis from other generators in healthcare that use the same product and the same process.

Remember that the information supplied on the MSDS is representative of the product; properties of the waste material may be different. Waste samples must be analyzed by a state of Wisconsin-certified laboratory. The Wisconsin lab certification number is usually printed on the laboratory data sheets. Certification status can also be determined by contacting the lab directly or by reviewing the DNR list of certified labs at [https://dnr.wi.gov/regulations/labcert/lablists.html](https://dnr.wi.gov/regulations/labcert/lablists.html).

- Use the attached worksheet to record the quantities of each type of hazardous waste generated per month and those waste types that require further evaluation.
- Evaluate if the waste determinations are representative of the waste currently generated. Make a new waste determination when changes in materials or processes affect the properties of waste generated.
- Make a waste determination on waste types that have not been evaluated.
- Include in your evaluation materials contaminated through use, such as empty vials, syringes, spill clean up materials, etc.
- Refer to ch. NR 661, Wis. Adm. Code, at [https://www.legis.state.wi.us/rsb/code/nr/nr661.pdf](https://www.legis.state.wi.us/rsb/code/nr/nr661.pdf) to determine if the waste is a characteristic or listed hazardous waste. Assign the appropriate waste codes (D, F, P or U) to each hazardous waste generated.
- Use the attached worksheet to calculate the total quantity of hazardous waste generated at your facility during the month. If the quantities of hazardous wastes vary from month to month, use the largest amounts generated to calculate generator status.
1. Has the generator obtained an EPA ID number? (NR 662.012)
   **Note:** Obtain an EPA ID number by submitting EPA form 8700-12 available at: https://www.epa.gov/hwgenerators/instructions-and-form-hazardous-waste-generators-transporters-and-treatment-storage-and. You must also submit notification when there is an ownership or name change.
   □ Yes □ No

2. Has a hazardous waste determination been made on each solid waste generated? (NR 662.190(2) / NR 662.011)
   □ Yes □ No

3. Has the waste determination been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used? (NR 662.190(2) / NR 662.011(3))
   □ Yes □ No

4. Are all waste analyses done by state of Wisconsin-certified laboratories? (NR 662.190(2) / NR 662.011(3)(a)1)
   □ Yes □ No □ N/A

5. Are records of all waste determinations kept on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility? (NR 662.193(1)(b))
   □ Yes □ No

**Section C: 180-Day Accumulation of Waste in Containers**

An SQG must ship all hazardous waste containers off-site within 180 days (or 270 days if waste must be shipped more than 200 miles), except satellite accumulation containers (see Section D). You must have a hazardous waste facility operating license to store hazardous waste containers for more than 180 (or 270) days. While on-site, containers must meet certain standards, such as being closed unless waste is added or removed, properly labeled and in good condition. Funnels left in containers should have lids that are closed except when waste is added or removed. Incompatible wastes should be separated from each other. Inspect containers weekly to ensure these standards are met. Employees conducting inspections should be trained to identify problems and take action to fix the problem as soon as possible. Containers that meet the definition of “empty” are not subject to hazardous waste requirements. A container is empty when it meets certain criteria, depending on if it contained a material classified as an acute or non-acute hazardous waste.

- Verify all containers used to accumulate hazardous waste meet standards.
- Assign and train employees to conduct weekly inspections in container accumulation areas.
- Train employees so they can identify problems and take corrective action.
- Verify all empty containers meet the definition of “empty.”
- Verify all containers of hazardous waste are shipped off-site within 180 (or 270) days.
- If containers of hazardous waste accumulate up to 270 days, verify the waste must be shipped to a treatment, storage or disposal facility located more than 200 miles away.
- If containers of hazardous waste have been on-site for more than 180 (or 270) days, make arrangements to ship them to an approved or exempt storage, treatment or disposal facility as soon as possible. Take appropriate actions (e.g., offer additional training, request the person inspecting containers to pay particular attention to accumulation start dates, etc.) to ensure additional wastes will be managed within 180 (or 270) days.

1. Is the accumulation start date clearly marked and visible for inspection on each container? (NR 662.192(1)(d)1)
   □ Yes □ No

2. Are all containers clearly marked with the words “Hazardous Waste”? (NR 662.192(1)(d)2)
   □ Yes □ No

3. If a container is leaking or in poor condition, are the contents transferred to another container in good condition? (NR 662.192(1)(b) / NR 665.0171)
   □ Yes □ No

4. Are containers made of or lined with materials that are compatible with the waste? (NR 662.192(1)(b) / NR 665.0172)
   □ Yes □ No

5. Are containers kept closed, except when it is necessary to add or remove waste? (NR 662.192(1)(b) / NR 665.0173(1))
   □ Yes □ No

6. Are containers opened, handled or stored to prevent leaks or ruptures? (NR 662.192(1)(b) / NR 665.0173(2))
   □ Yes □ No
7. Are container storage areas inspected weekly for leaks and deterioration? (NR 662.192(1)(b) / NR 665.0174)
   - □ Yes  □ No  □ N/A

8. Are containers of incompatible wastes separated or protected from each other by a physical barrier (dike, berm, wall or other device)? (NR 662.192(1)(b) / NR 665.0177(3))
   - □ Yes  □ No  □ N/A

9. Are incompatible wastes stored in separate containers unless the mixing of incompatible wastes will not generate extreme heat, fire, explosion, toxic gases or other dangers? (NR 662.192(1)(b) / NR 665.0177(1))
   - □ Yes  □ No  □ N/A

10. Are containers that previously held waste properly washed before adding incompatible waste, unless the mixing of incompatible wastes will not generate extreme heat, fire, explosion, toxic gases or other dangers? (NR 662.192(1)(b) / NR 665.0177(2))
    - □ Yes  □ No  □ N/A

11. Do “empty” containers that held non-acute hazardous waste meet all of the following standards? (NR 661.07(2)(a))
    - □ All wastes have been removed by normal means for the type of container (pouring, pumping, aspirating, etc.).
    - □ 3 percent or less of the total volume of the container remains or no more than an inch of residue remains.
    - □ Yes  □ No  □ N/A

12. Is the pressure in “empty” containers of compressed gas (pressurized inhalers, aerosol cans, gas cylinders) at or near atmospheric pressure? (NR 661.07(2)(b))
    - □ Yes  □ No  □ N/A

13. Do “empty” containers that held acute hazardous waste meet one of the following standards? (NR 661.07(2)(c))
    - □ The container has been triple rinsed.
    - □ The container has been cleaned by another method as effective as triple rinsing.
    - □ The container’s inner liner has been removed and disposed as hazardous waste.
    - □ Yes  □ No  □ N/A

14. Is the rinsate from cleaning a container of acute hazardous waste disposed as hazardous waste? (NR 661.07(1)(b))
    - □ Yes  □ No  □ N/A

   **Note:** The rinsate may be usable as a product (e.g., pesticide application).

15. Except for satellite accumulation containers, are all containers of hazardous waste shipped off-site within the following time periods? (NR 662.192(1))
    - □ Within 180 days of the waste first being placed in the container.
    - □ Within 270 days of first filling the container, if the waste must be transported more than 200 miles.
    - □ Yes  □ No  □ N/A
Section D: Satellite Accumulation

Satellite accumulation containers are located at or near the point of generation and are under the control of the operator of the process generating the waste. The accumulation time limit of 180 (or 270) days does not apply to the satellite containers until in excess of either 55 gallons of non-acute hazardous waste or 1 quart of acute hazardous waste is accumulated. While in satellite accumulation, the containers must meet certain standards, such as being labeled and in good condition. Within three days of accumulating the excess amount, move the container to the 180-day accumulation area. The accumulation start date is the date when the excess amount of waste accumulated in the satellite area.

You can establish more than one satellite accumulation area at your facility. Satellite accumulation containers may be located next to each other. For example, a satellite accumulation area for mercury waste may be located near one for solvent-based reagent waste as long as they are both at or near the point of generation, under the control of the person operating the process that generates the waste, and the stated quantities of hazardous waste (55 gallons non-acute or 1 quart acute) are not exceeded.

- ✔ Verify satellite accumulation areas are at or near the point of generation and under operator control.
- ✔ Verify less than 55-gallons non-acute or 1 quart acute hazardous waste accumulate in satellite areas.
- ✔ Verify satellite containers are moved to the 180-day accumulation area within three days of generating excess amounts.
- ✔ Verify containers meet standards while in satellite areas.
- ✔ Verify the date of accumulation marked on the container is the date when excess waste first accumulates.

1. Does the generator accumulate waste at or near the generation point? (NR 662.192(4)(a)) If No, go to Section E. □ Yes □ No

2. Does less than 55 gallons of non-acute hazardous waste or 1 quart of acute hazardous waste accumulate in each satellite area? (NR 662.192(4)(a)) □ Yes □ No

3. Are the satellite containers under the control of the operator of the process generating the waste? (NR 662.192(4)(a)) □ Yes □ No

4. If a container is leaking or in poor condition, are the contents transferred to another container in good condition? (NR 662.192(4)(a1) / NR 665.0171) □ Yes □ No

5. Are containers made of or lined with materials that are compatible with the waste? (NR 662.192(4)(a1) / NR 665.0172) □ Yes □ No

6. Are containers kept closed except when it is necessary to add or remove waste? (NR 662.192(4)(a1) / NR 665.0173(1)) □ Yes □ No

7. Are the containers marked “hazardous waste” or with other words that identify the contents? (NR 662.192(4)(a2)) □ Yes □ No

8. Is the container holding the excess waste marked with the date the excess amount begins accumulating? (NR 662.192(4)(b)) □ Yes □ No

9. Does the generator comply with the 180-day accumulation requirements stated in Section C above with respect to the excess amount within three days of it being moved out of the satellite area? (NR 662.192(4)(b)) □ Yes □ No
**Section E: Land Disposal Restrictions (LDR)**

Hazardous waste must meet certain treatment standards before it is land disposed (placed in a landfill, surface impoundment or waste pile). The standards have been established to protect groundwater and are technology based (manage the waste using a specific technology such as incineration, chemical reduction, etc.) or concentration based (total or leachable concentrations of certain hazardous constituents are stated for the waste). See s. NR 668.40 at [https://www.legis.state.wi.us/rsb/code/nr/nr668.pdf](https://www.legis.state.wi.us/rsb/code/nr/nr668.pdf) for the treatment standards that apply to each waste type generated at your facility.

The treatment standards for most characteristic hazardous wastes require treating the waste to remove the hazardous waste characteristic, such as neutralizing the corrosive characteristic of a D002 waste acid. Characteristic wastes must also be evaluated for underlying hazardous constituents or approximately 200 hazardous compounds that must be treated to contaminant specific levels known as universal treatment standards. If the treatment standards in NR 668.40 include a reference to NR 668.48, the waste must be evaluated by the generator for the underlying hazardous constituents reasonably expected to be present in the waste and whether their universal treatment standards are met.

The generator must provide a one-time written notice to the receiving facility stating the waste meets the treatment standards and can be land disposed; or, the waste does not meet treatment standards and must be treated before it is land disposed. Complete a new written notice when the receiving facility changes or characteristics of the waste change. The generator is prohibited from using dilution as a treatment method. If you treat hazardous waste on-site in containers, you must develop a waste analysis plan that describes how the LDR treatment standards, including the universal treatment standards, will be met. You must also provide a notification form to the waste disposal company certifying that the treated waste meets all applicable treatment standards.

- Verify a one-time LDR notification form is maintained on-site for each type of waste generated.
- Verify the notification is accurate and includes underlying hazardous constituents, if applicable.
- Verify the waste is not diluted to meet treatment standards.
- If waste is treated on-site in containers, verify a waste analysis plan has been developed and a LDR certification accompanies the treated waste when it is shipped off-site.

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>1. Has the generator determined if each waste requires treatment before it is land disposed? (NR 668.07(1))</td>
<td>☐ Yes ☐ No</td>
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<tr>
<td>If yes, the determination was made using:</td>
<td>☐ Lab analysis ☐ Generator knowledge</td>
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<td>2. Does the generator prohibit the dilution of wastes to meet treatment standards? (NR 668.03)</td>
<td>☐ Yes ☐ No</td>
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<tr>
<td>3. Is a one-time written notice of applicable LDR requirements sent to each treatment, storage or disposal facility with the initial waste shipment? (NR 668.07(1))</td>
<td>☐ Yes ☐ No</td>
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<td><strong>Note:</strong> Some facilities require a written notice with each waste shipment.</td>
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<tr>
<td>4. Is a new notification sent to the treatment, storage or disposal facility and is it maintained in the generator file when the waste or receiving facility changes? (NR 668.07(1))</td>
<td>☐ Yes ☐ No ☐ N/A</td>
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<tr>
<td>5. Has the correct notification been made? (NR 668.07(1))</td>
<td>☐ Yes ☐ No</td>
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<tr>
<td>☐ If the waste MEETS treatment standards, provide certification that wastes may be land disposed without further treatment.</td>
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<tr>
<td>☐ If the waste does NOT MEET treatment standards; give notice of appropriate treatment standards and applicable prohibitions.</td>
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<tr>
<td>6. Is a copy of the LDR notifications and certifications retained for at least three years from the date the waste was last sent off-site? (NR 668.07(1)(h))</td>
<td>☐ Yes ☐ No</td>
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</table>
7. If the generator has a contractual agreement for reclaiming the waste, are ALL of the following met? NR 668.07(1)(j)
   - Compliance with the notification and certification requirements for the initial shipment of the waste subject to the agreement.
   - Retain a copy of the notification and certification with the tolling agreement for at least three years after the agreement is terminated or expires.

   □ Yes □ No □ N/A

8. If applicable, have underlying hazardous constituents been identified for characteristic wastes? (NR 668.09(1))

   □ Yes □ No □ N/A

9. If waste is treated in containers, has the generator met the following? (NR 662.192(1)(d) / NR 668.07(1)(e))
   - Develop a written waste analysis plan which describes the procedures used to meet applicable LDR treatment standards.
   - Provide certification that the waste meets applicable treatment standards.

   □ Yes □ No □ N/A

**Section F: On-Site Treatment**

Treatment changes the physical, chemical, or biological characteristics so as to render the waste non-hazardous, more amendable for recycling, reduced in volume or safer for transport. Some treatment activities, such as solvent distillation, elementary neutralization and silver recovery, may be performed on-site without a hazardous waste treatment license. Do not perform other treatment activities unless your facility has been issued a hazardous waste treatment license. Evaporating hazardous waste solvents is treatment subject to licensing. Treatment activities that are exempt from hazardous waste licensing requirements are stated in NR 670.001(3)(b).

Hazardous waste accumulated on-site before treatment and hazardous waste generated as a result of the treatment activity must be managed in compliance with applicable hazardous waste requirements. For example, waste solvent accumulated before it is distilled on-site should be managed in compliance with SQG requirements (make a waste determination; recycle the solvent within 180 days; and, use containers that are in good condition, labeled “hazardous waste,” marked with the accumulation start date and kept closed except when adding or removing waste). The still bottoms generated by recycling the solvent should also be managed in compliance with the SQG requirements.

- Determine if the facility is conducting on-site treatment.
- Determine if wastes accumulated on-site before or after treatment are managed according to SQG requirements.
- Discontinue treatment activities that require a hazardous waste treatment license.

1. If hazardous waste is recycled on-site, does the generator comply with all of the applicable SQG requirements while hazardous waste is accumulated on-site before and after the recycling activity? (NR 661.06(2))

   □ Yes □ No □ N/A

2. If hazardous waste is neutralized in a tank or container, is the waste hazardous for only the corrosivity characteristic? (NR 665.0001(3)(j))

   **Note:** If the waste is hazardous for more than the corrosivity characteristic, the treatment is not exempt from licensing.

   □ Yes □ No □ N/A

3. If the facility is operating a silver recovery unit (e.g., x-ray or photography), is the silver sent off-site for further reclamation?

   **Note:** Per NR 666.070(3), persons who store recycled materials must keep records to document they are not accumulating the materials speculatively (at least 75 percent of the material is legitimately recycled each calendar year).

   □ Yes □ No □ N/A

4. If hazardous waste is treated in containers, does the facility comply with the container standards stated in Section C above during the treatment activity? (NR 665.0001(3)(g))

   □ Yes □ No □ N/A
5. If absorbent material is combined with hazardous waste to eliminate free liquids, are all of the following requirements met? (NR 665.0001(3)(m))

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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<tbody>
<tr>
<td>The absorbent material is added when the hazardous waste is first placed in the container.</td>
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<tr>
<td>The contents of a container that is leaking or in poor condition are transferred to a container in good condition.</td>
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<tr>
<td>When mixing incompatible wastes, precautions are taken to prevent reactions that generate extreme heat, fire, explosion, toxic gases or other dangers.</td>
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<tr>
<td>The container is made of materials that are compatible with the waste.</td>
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6. If other hazardous waste treatment activities occur on-site, is the treatment exempt from hazardous waste licensing requirements?

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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<tbody>
<tr>
<td>The container is made of materials that are compatible with the waste.</td>
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**Section G: Manifest, Pre-Transport Requirements and Off-Site Shipments**

Unless treated on-site, hazardous waste must be shipped to an approved or exempt hazardous waste treatment, storage or disposal facility using a specific shipping document known as the hazardous waste manifest. If more wastes are shipped off-site than can be listed on the manifest, supplement the manifest with a manifest continuation form. For more information, see the DNR publication “Hazardous Waste Manifests” at [https://dnr.wi.gov/files/pdf/pubs/wa/wa1176.pdf](https://dnr.wi.gov/files/pdf/pubs/wa/wa1176.pdf). Before offering any waste for transport, verify that the waste is in U.S. Department of Transportation (DOT)-approved containers that are labeled, marked and placarded according to DOT requirements. Work with your transporter and treatment, storage and disposal facility to ensure DOT requirements are met. Have placards available for use by the transporter.

- [ ] Verify all waste is sent to approved or exempt hazardous waste facilities.
- [ ] Verify manifest requirements are followed.
- [ ] Verify all containers are properly labeled, marked and placarded before they are transported off-site.
- [ ] Verify placards are on-site and available for the transporter to use.

1. Are any wastes sent off-site to be reclaimed under a contractual agreement? If NO, go to Question 5.

2. Are the waste types and frequency of shipments specified in the contractual agreement? (NR 662.191(1)(a))

3. Is the vehicle used to transport the waste between the reclaimer and your facility owned and operated by the reclaimer? (NR 662.191(1)(b))

4. Is a copy of the reclamation agreement maintained for at least three years from the date the agreement is terminated or expires? (NR 662.191(2))

5. Does your facility send hazardous waste off-site to a treatment, storage or disposal facility? If NO, go to Section H.

6. Does the generator comply with the following manifest requirements? (NR 662.190(2)(a))

- [ ] The manifest is used according to the instructions in the appendix to 40 CFR part 262. (NR 662.020(1))
- [ ] A facility that is permitted or licensed to accept the waste is designated on the manifest. (NR 662.020(2))
- [ ] For out-of-state shipments, the generator sends a copy of the manifest to the DNR within 30 days of receiving the signed copy from the treatment, storage or disposal facility. (NR 662.023(3))

7. Is the manifest continuation form, EPA form 8700-22A, prepared according to the instructions in the appendix of 40 CFR part 262? (NR 662.190(2)(a) / NR 662.020(1))
8. If the generator received a shipment back as a rejected load, have the following requirements been met? (NR 662.192(5))  

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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<tbody>
<tr>
<td>Accumulated for less than 180 (or 270) days.</td>
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<tr>
<td>Kept closed except if waste was added or removed.</td>
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<tr>
<td>Labeled as containing “hazardous waste.”</td>
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<tr>
<td>In good condition.</td>
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Upon return, the waste containers were:

- Accumulated for less than 180 (or 270) days.
- Kept closed except if waste was added or removed.
- Labeled as containing “hazardous waste.”
- In good condition.

Upon receipt of the shipment, the generator signed either:

- Manifest Item 18c if the transporter returned the shipment using the original manifest.
- Manifest Item 20 if the transporter returned the shipment using a new manifest.

9. Is a copy of the manifest signed by the generator retained until the signed copy from the treatment, storage or disposal facility is received? (NR 662.193(1)(a))

10. Is a copy of each manifest kept for at least three years from the date of shipment? (NR 662.190(2) / NR 662.030)

11. Is the hazardous waste packaged according to applicable DOT requirements before transport? (NR 662.190(2) / NR 662.030)

12. Is the hazardous waste labeled according to applicable DOT requirements before transport? (NR 662.190(2) / NR 662.031)

13. Is the hazardous waste marked according to applicable DOT requirements before transport? (NR 662.190(2) / NR 662.032(1))

14. Before transport, are containers of 119 gallons and less marked as containing hazardous waste with a statement that Federal law prohibits improper disposal and a description of the waste type, the generator name and EPA ID number? (NR 662.190(2) / NR 662.032(2))

15. Does the generator offer placards to the initial transporter? (NR 662.190(2) / NR 662.033)

Section H: Waste Minimization Certification

The person who signs the hazardous waste manifest also certifies that the generator has made a good faith effort to minimize the amount of hazardous waste generated and has selected the best waste management methods that are affordable.

Waste minimization means reducing the quantity or toxicity of the hazardous waste generated. Examples of waste minimization include substituting materials that are less toxic and using smaller quantities of product. Once generated, the best way to manage hazardous waste is to recycle it. For example, reclaim product by distilling waste solvent or burn the waste solvent for energy recovery rather than destroying it by incineration. Mercury can be reclaimed from wastes such as thermometers, blood pressure cuffs, etc. Some hazardous wastes cannot be recycled and must be sent for treatment or incineration.

- Determine the hazardous waste minimization efforts at your facility.
- Verify all employees are following established hazardous waste minimization procedures.
- Determine if other hazardous waste minimization activities can be initiated.
- Determine if better waste management methods can be used for the types of hazardous waste generated.

1. Has the small quantity generator made a good faith effort to minimize the amount of waste generated? (NR 662.190(2)(a) / NR 662.027(2))

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
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</table>
**Section I: Preparedness and Prevention**

Emergency equipment, including communication devices and response equipment, should be readily accessible to employees in the event of an emergency involving hazardous waste, such as a spill or fire. Periodically inventory and test the equipment to ensure it is in working order. Appropriate emergency equipment for the type of wastes handled should be available to the employees. For example, have mercury spill kits in areas where mercury wastes are handled; neutralization kits in areas where acids are used; and, fire extinguishing devices in areas where solvent wastes are managed.

Inform the fire and police departments of potential emergency situations at your facility. Determine if employees at your facility will respond to an emergency or if arrangements will be made with an emergency response contractor. Maintain aisle space to allow for inspections and the unobstructed movement of emergency personnel and their equipment in areas where hazardous waste is managed.

- Verify each department is adequately supplied with emergency equipment.
- Verify the emergency equipment is checked, maintained and inventoried on a routine schedule.
- Verify arrangements have been made with local police and fire departments.
- Determine if employees at your facility will handle hazardous waste emergencies or if arrangements will be made with an emergency response contractor.
- Verify aisle space is maintained in the facility, such as in areas where hazardous waste containers accumulate.

<table>
<thead>
<tr>
<th>1. Does the generator have ALL of the following, unless the equipment is not necessary for the types of wastes handled? (NR 662.192(1)(d) / NR 665.0032)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Device to summon emergency assistance (e.g., telephone, 2 way radio).</td>
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<tr>
<td>Internal communications and alarm systems.</td>
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<tr>
<td>Portable fire extinguishers.</td>
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<tr>
<td>Fire control equipment, including special extinguishing equipment.</td>
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<tr>
<td>Spill control equipment.</td>
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<tr>
<td>Decontamination equipment (e.g., eyewash, shower).</td>
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<tr>
<td>Water at adequate volume and pressure to supply water spray systems.</td>
</tr>
</tbody>
</table>

[☐] Yes  [☐] No

<table>
<thead>
<tr>
<th>2. Is all of the above emergency equipment tested and maintained to assure its proper operation in an emergency? (NR 662.192(1)(d) / NR 665.0033)</th>
</tr>
</thead>
</table>

[☐] Yes  [☐] No

<table>
<thead>
<tr>
<th>3. Is there immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas? (NR 662.192(1)(d) / NR 665.0034)</th>
</tr>
</thead>
</table>

[☐] Yes  [☐] No

<table>
<thead>
<tr>
<th>4. Has the generator made necessary arrangements with ALL of the following emergency organizations? (NR 662.192(1)(d) / NR 665.0037)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary and support roles have been defined if multiple police and fire departments could respond to an emergency.</td>
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<tr>
<td>Familiarize police, fire and emergency response teams with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes.</td>
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<tr>
<td>Agreements with emergency response contractors and equipment suppliers.</td>
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<tr>
<td>Familiarize local hospitals with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.</td>
</tr>
</tbody>
</table>

[☐] Yes  [☐] No

<table>
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<tr>
<th>5. Is aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment? (NR 662.192(1)(d) / NR 665.0035)</th>
</tr>
</thead>
</table>

[☐] Yes  [☐] No
**Section J: Emergency Procedures and Personnel Training Requirements**

Designate at least one person as the emergency coordinator who will be in charge in the event of an emergency. Determine if an emergency coordinator should be designated for each department, several departments or the whole facility; and, if an emergency coordinator should be designated for each shift. The emergency coordinators must be familiar with the waste types generated at the facility, the areas where hazardous waste is accumulated, and the hazards associated with the waste. They must have authority to carry out the necessary procedures in the event of an emergency.

Post the phone numbers for police and fire, location of spill control equipment and fire control equipment next to the telephones. If employees are instructed to call 911, post the number that must be dialed to access an outside line (e.g., 9-911).

Adequately train employees to properly manage hazardous waste during normal operations and emergencies. For example, train employees to properly label containers, keep containers closed when waste is not being added, and maintain containers in good condition. Employees should know how to correct problems and when and to whom they should report the problems.

- Verify emergency coordinators have been identified for each department and shift, as necessary.
- Verify the necessary emergency information is posted next to the phones.
- Verify all employees involved in the routine and emergency management of hazardous receive training relative to their responsibilities.

<table>
<thead>
<tr>
<th>1. Has a person been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or can reach the site within a short period of time? (NR 662.192(1)(e)1)</th>
<th>□ Yes □ No</th>
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<tr>
<td>2. Is ALL of the following information posted next to the telephones? (NR 662.192(1)(e)2)</td>
<td>□ Yes □ No</td>
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<tr>
<td>- Name and telephone number of the emergency coordinator.</td>
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<tr>
<td>- Location of fire extinguishers, spill control material and, if present, fire alarm.</td>
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<tr>
<td>- Telephone number of fire department unless the generator has a direct alarm.</td>
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<tr>
<td>3. In the event of an emergency, will the emergency coordinator take the following actions? (NR 662.192(1)(e)4)</td>
<td>□ Yes □ No</td>
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<tr>
<td>- In the event of a release, call Wisconsin Emergency Management (800-943-0003) and comply with NR 706.</td>
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<tr>
<td>- In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate.</td>
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<tr>
<td>- In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil.</td>
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<tr>
<td>- If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).</td>
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<tr>
<td>4. Are all employees thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies? (NR 662.192(1)(e)3)</td>
<td>□ Yes □ No</td>
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</tbody>
</table>
Section K: Annual Reports and Exception Reporting

If you notified as a SQG (or LQG) when you requested an EPA ID number, you will automatically receive instructions at the end of each calendar year regarding the completion of the hazardous waste annual report. The annual report is a Web-based program which allows you to provide information regarding your hazardous waste activities for the previous calendar year, including the quantities of waste generated, treated on-site or shipped off-site.

If you do not receive a copy of the signed hazardous waste manifest from the receiving facility within 35 days of shipment, contact the transporter and receiving facility to determine what happened to the shipment. Submit an exception report to the DNR as notification that you, the generator, have not received a copy of the signed manifest from the receiving facility within 60 days of shipment.

- ☑ Verify hazardous waste annual reports are submitted to the DNR.
- ☑ Verify hazardous waste annual report records are maintained on-site.
- ☑ Determine if exception reports have been filed, if necessary.

1. Have hazardous waste annual reports covering generator activities during the previous calendar year been submitted to the DNR by March 1 of the following year? (NR 662.193(3))
   - □ Yes □ No

2. Is a copy of each hazardous waste annual report kept for at least three years from the due date? (NR 662.193(1)(c))
   - □ Yes □ No

3. Are procedures for exception reporting followed? (NR 662.193(2))
   - □ Yes □ No □ N/A
     - If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery is submitted to the DNR.

For more information on waste in healthcare, see [https://dnr.wi.gov/topic/HealthWaste/Business.html](https://dnr.wi.gov/topic/HealthWaste/Business.html).

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Disclaimer: This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

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Worksheet for Calculating Total Quantity of Hazardous Waste Generated

For the whole facility: □ Yes □ No

Only for Department (name): _________________________

<table>
<thead>
<tr>
<th>Description of waste generated (e.g., waste acetone, coumadin, etc.)</th>
<th>Hazardous waste code</th>
<th>Generation rate (lbs./month)</th>
<th>Facility to which waste is whipped</th>
<th>Analysis available (✓)</th>
<th>Generator knowledge (✓)</th>
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Maximum quantity of waste generated per month1:

- Non-acute waste: _____________ lb/mo
- Acute waste: _____________ lb/mo

1If this is the quantity of hazardous waste generated in one department, use a separate worksheet to calculate the total amount generated at the facility.