

# Self-Audit Checklist (SQGs)

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](http://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**

## What type of generator are you?

Note: The totals below are for any calendar month.

**Large quantity generators (LQGs)** generate any of the following amounts of hazardous waste:

- more than 2,205 lbs. of hazardous waste;
- more than 2.2 lbs. of acute hazardous waste; or
- more than 220 lbs. of residue from cleaning up a spill of acute hazardous waste.

**Small quantity generators (SQGs)** generate:

- between 220 and 2,205 lbs. of hazardous waste;
- less than 2.2 lbs. of acute hazardous waste; **and**
- less than 220 lbs. of residue from cleaning up a spill of acute hazardous waste.

**Very small quantity generators (VSQGs)** generate:

- less than 220 lbs. of hazardous waste;
- less than 2.2 lbs. of acute hazardous waste; **and**
- less than 220 lbs. of residue from cleaning up a spill of acute hazardous waste.

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		
Name of Healthcare Facility		
Street Address		City
Date of Audit	Name of Auditors	
Personnel Interviewed During Audit		Title and Department

<p><b>Section B: Waste Information</b></p> <p>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.</p> <p>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 <a href="https://dnr.wi.gov/regulations/labcert/lablists.html">https://dnr.wi.gov/regulations/labcert/lablists.html</a>.</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> 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.</li> <li><input checked="" type="checkbox"/> 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.</li> <li><input checked="" type="checkbox"/> Make a waste determination on waste types that have not been evaluated.</li> <li><input checked="" type="checkbox"/> Include in your evaluation materials contaminated through use, such as empty vials, syringes, spill clean up materials, etc.</li> <li><input checked="" type="checkbox"/> Refer to ch. NR 661, Wis. Adm. Code, at <a href="https://www.legis.state.wi.us/rsb/code/nr/nr661.pdf">https://www.legis.state.wi.us/rsb/code/nr/nr661.pdf</a> 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.</li> <li><input checked="" type="checkbox"/> 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.</li> </ul>
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<p>1. Has the generator obtained an EPA ID number? (NR 662.012)  <b>Note:</b> Obtain an EPA ID number by submitting EPA form 8700-12 available at: <a href="https://www.epa.gov/hwgenerators/instructions-and-form-hazardous-waste-generators-transporters-and-treatment-storage-and-disposal">https://www.epa.gov/hwgenerators/instructions-and-form-hazardous-waste-generators-transporters-and-treatment-storage-and-disposal</a>. You must also submit notification when there is an ownership or name change.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>2. Has a hazardous waste determination been made on each solid waste generated? (NR 662.190(2) / NR 662.011)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>4. Are all waste analyses done by state of Wisconsin-certified laboratories? (NR 662.190(2) / NR 662.011(3)(a)1)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>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))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Section C: 180-Day Accumulation of Waste in Containers</b>  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.</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Verify all containers used to accumulate hazardous waste meet standards.</li> <li><input checked="" type="checkbox"/> Assign and train employees to conduct weekly inspections in container accumulation areas.</li> <li><input checked="" type="checkbox"/> Train employees so they can identify problems and take corrective action.</li> <li><input checked="" type="checkbox"/> Verify all empty containers meet the definition of “empty.”</li> <li><input checked="" type="checkbox"/> Verify all containers of hazardous waste are shipped off-site within 180 (or 270) days.</li> <li><input checked="" type="checkbox"/> 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.</li> <li><input checked="" type="checkbox"/> 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.</li> </ul>	
<p>1. Is the accumulation start date clearly marked and visible for inspection on each container? (NR 662.192(1)(d)1)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>2. Are all containers clearly marked with the words “Hazardous Waste”? (NR 662.192(1)(d)2)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>4. Are containers made of or lined with materials that are compatible with the waste? (NR 662.192(1)(b) / NR 665.0172)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>5. Are containers kept closed, except when it is necessary to add or remove waste? (NR 662.192(1)(b) / NR 665.0173(1))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>6. Are containers opened, handled or stored to prevent leaks or ruptures? (NR 662.192(1)(b) / NR 665.0173(2))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

7. Are container storage areas inspected weekly for leaks and deterioration? (NR 662.192(1)(b) / NR 665.0174)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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))	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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))	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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))	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
11. Do "empty" containers that held non-acute hazardous waste meet all of the following standards? (NR 661.07(2)(a)) <input type="checkbox"/> All wastes have been removed by normal means for the type of container (pouring, pumping, aspirating, etc.). <input type="checkbox"/> 3 percent or less of the total volume of the container remains or no more than an inch of residue remains.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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))	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
13. Do "empty" containers that held acute hazardous waste meet one of the following standards? (NR 661.07(2)(c)) <input type="checkbox"/> The container has been triple rinsed. <input type="checkbox"/> The container has been cleaned by another method as effective as triple rinsing. <input type="checkbox"/> The container's inner liner has been removed and disposed as hazardous waste.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
14. Is the rinsate from cleaning a container of acute hazardous waste disposed as hazardous waste? (NR 661.07(1)(b)) <b>Note:</b> The rinsate may be usable as a product (e.g., pesticide application).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
15. Except for satellite accumulation containers, are all containers of hazardous waste shipped off-site within the following time periods? (NR 662.192(1)) <input type="checkbox"/> Within 180 days of the waste first being placed in the container. <input type="checkbox"/> Within 270 days of first filling the container, if the waste must be transported more than 200 miles.	<input type="checkbox"/> Yes <input type="checkbox"/> No

**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.	<input type="checkbox"/> Yes <input type="checkbox"/> 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))	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Are the satellite containers under the control of the operator of the process generating the waste? (NR 662.192(4)(a))	<input type="checkbox"/> Yes <input type="checkbox"/> 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)(a)1 / NR 665.0171)	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. Are containers made of or lined with materials that are compatible with the waste? (NR 62.192(4)(a)1 / NR 665.0172)	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. Are containers kept closed except when it is necessary to add or remove waste? (NR 662.192(4)(a)1 / NR 665.0173(1))	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. Are the containers marked "hazardous waste" or with other words that identify the contents? (NR 662.192(4)(a)2)	<input type="checkbox"/> Yes <input type="checkbox"/> No
8. Is the container holding the excess waste marked with the date the excess amount begins accumulating? (NR 662.192(4)(b))	<input type="checkbox"/> Yes <input type="checkbox"/> 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))	<input type="checkbox"/> Yes <input type="checkbox"/> 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> 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.

<p>1. Has the generator determined if each waste requires treatment before it is land disposed? (NR 668.07(1))</p> <p>If yes, the determination was made using:  <input type="checkbox"/> Lab analysis    <input type="checkbox"/> Generator knowledge</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>2. Does the generator prohibit the dilution of wastes to meet treatment standards? (NR 668.03)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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))</p> <p><b>Note:</b> Some facilities require a written notice with each waste shipment.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>5. Has the correct notification been made? (NR 668.07(1))</p> <p><input type="checkbox"/> If the waste MEETS treatment standards, provide certification that wastes may be land disposed without further treatment.</p> <p><input type="checkbox"/> If the waste does NOT MEET treatment standards; give notice of appropriate treatment standards and applicable prohibitions.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

<p>7. If the generator has a contractual agreement for reclaiming the waste, are ALL of the following met? NR 668.07(1)(j)</p> <p><input type="checkbox"/> Comply with the notification and certification requirements for the initial shipment of the waste subject to the agreement.</p> <p><input type="checkbox"/> Retain a copy of the notification and certification with the tolling agreement for at least three years after the agreement is terminated or expires.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>8. If applicable, have underlying hazardous constituents been identified for characteristic wastes? (NR 668.09(1))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>9. If waste is treated in containers, has the generator met the following? (NR 662.192(1)(d) / NR 668.07(1)(e))</p> <p><input type="checkbox"/> Develop a written waste analysis plan which describes the procedures used to meet applicable LDR treatment standards.</p> <p><input type="checkbox"/> Provide certification that the waste meets applicable treatment standards.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Section F: On-Site Treatment</b></p> <p>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).</p> <p>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.</p> <p><input checked="" type="checkbox"/> Determine if the facility is conducting on-site treatment.</p> <p><input checked="" type="checkbox"/> Determine if wastes accumulated on-site before or after treatment are managed according to SQG requirements.</p> <p><input checked="" type="checkbox"/> Discontinue treatment activities that require a hazardous waste treatment license.</p>	
<p>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))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>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))</p> <p><b>Note:</b> If the waste is hazardous for more than the corrosivity characteristic, the treatment is not exempt from licensing.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>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?</p> <p><b>Note:</b> 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).</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>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))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

<p>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))</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The absorbent material is added when the hazardous waste is first placed in the container.</li> <li><input type="checkbox"/> The contents of a container that is leaking or in poor condition are transferred to a container in good condition.</li> <li><input type="checkbox"/> When mixing incompatible wastes, precautions are taken to prevent reactions that generate extreme heat, fire, explosion, toxic gases or other dangers.</li> <li><input type="checkbox"/> The container is made of materials that are compatible with the waste.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>6. If other hazardous waste treatment activities occur on-site, is the treatment exempt from hazardous waste licensing requirements?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Section G: Manifest, Pre-Transport Requirements and Off-Site Shipments</b>  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 <a href="https://dnr.wi.gov/files/pdf/pubs/wa/wa1176.pdf">https://dnr.wi.gov/files/pdf/pubs/wa/wa1176.pdf</a>. 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.</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Verify all waste is sent to approved or exempt hazardous waste facilities.</li> <li><input checked="" type="checkbox"/> Verify manifest requirements are followed.</li> <li><input checked="" type="checkbox"/> Verify all containers are properly labeled, marked and placarded before they are transported off-site.</li> <li><input checked="" type="checkbox"/> Verify placards are on-site and available for the transporter to use.</li> </ul>	
<p>1. Are any wastes sent off-site to be reclaimed under a contractual agreement? If NO, go to Question 5.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>2. Are the waste types and frequency of shipments specified in the contractual agreement? (NR 662.191(1)(a))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>5. Does your facility send hazardous waste off-site to a treatment, storage or disposal facility? If NO, go to Section H.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>6. Does the generator comply with the following manifest requirements? (NR 662.190(2)(a))</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The manifest is used according to the instructions in the appendix to 40 CFR part 262. (NR 662.020(1))</li> <li><input type="checkbox"/> A facility that is permitted or licensed to accept the waste is designated on the manifest. (NR 662.020(2))</li> <li><input type="checkbox"/> 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))</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

<p>8. If the generator received a shipment back as a rejected load, have the following requirements been met? (NR 662.192(5))</p> <p>Upon return, the waste containers were:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Accumulated for less than 180 (or 270) days.</li> <li><input type="checkbox"/> Kept closed except if waste was added or removed.</li> <li><input type="checkbox"/> Labeled as containing "hazardous waste."</li> <li><input type="checkbox"/> In good condition.</li> </ul> <p>Upon receipt of the shipment, the generator signed either:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Manifest Item 18c if the transporter returned the shipment using the original manifest.</li> <li><input type="checkbox"/> Manifest Item 20 if the transporter returned the shipment using a new manifest.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>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))</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>10. Is a copy of each manifest kept for at least three years from the date of shipment? (NR 662.193(1)(a))</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>11. Is the hazardous waste packaged according to applicable DOT requirements before transport? (NR 662.190(2) / NR 662.030)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>12. Is the hazardous waste labeled according to applicable DOT requirements before transport? (NR 662.190(2) / NR 662.031)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>13. Is the hazardous waste marked according to applicable DOT requirements before transport? (NR 662.190(2) / NR 662.032(1))</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>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))</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>15. Does the generator offer placards to the initial transporter? (NR 662.190(2) / NR 662.033)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>Section H: Waste Minimization Certification</b></p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Determine the hazardous waste minimization efforts at your facility.</li> <li><input checked="" type="checkbox"/> Verify all employees are following established hazardous waste minimization procedures.</li> <li><input checked="" type="checkbox"/> Determine if other hazardous waste minimization activities can be initiated.</li> <li><input checked="" type="checkbox"/> Determine if better waste management methods can be used for the types of hazardous waste generated.</li> </ul>	
<p>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))</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

**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.

<p>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)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Device to summon emergency assistance (e.g., telephone, 2 way radio).</li> <li><input type="checkbox"/> Internal communications and alarm systems.</li> <li><input type="checkbox"/> Portable fire extinguishers.</li> <li><input type="checkbox"/> Fire control equipment, including special extinguishing equipment.</li> <li><input type="checkbox"/> Spill control equipment.</li> <li><input type="checkbox"/> Decontamination equipment (e.g., eyewash, shower).</li> <li><input type="checkbox"/> Water at adequate volume and pressure to supply water spray systems.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>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)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>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)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>4. Has the generator made necessary arrangements with ALL of the following emergency organizations? (NR 662.192(1)(d) / NR 665.0037)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Primary and support roles have been defined if multiple police and fire departments could respond to an emergency.</li> <li><input type="checkbox"/> 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.</li> <li><input type="checkbox"/> Agreements with emergency response contractors and equipment suppliers.</li> <li><input type="checkbox"/> Familiarize local hospitals with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>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)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

**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.

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)	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Is ALL of the following information posted next to the telephones? (NR 662.192(1)(e)2) <input type="checkbox"/> Name and telephone number of the emergency coordinator. <input type="checkbox"/> Location of fire extinguishers, spill control material and, if present, fire alarm. <input type="checkbox"/> Telephone number of fire department unless the generator has a direct alarm.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. In the event of an emergency, will the emergency coordinator take the following actions? (NR 662.192(1)(e)4) <input type="checkbox"/> In the event of a release, call Wisconsin Emergency Management (800-943-0003) and comply with NR 706. <input type="checkbox"/> In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate. <input type="checkbox"/> 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. <input type="checkbox"/> 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).	<input type="checkbox"/> Yes <input type="checkbox"/> No
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)	<input type="checkbox"/> Yes <input type="checkbox"/> No

### 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))	<input type="checkbox"/> Yes <input type="checkbox"/> 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))	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Are procedures for exception reporting followed? (NR 662.193(2)) <input type="checkbox"/> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

For more information on waste in healthcare, see <https://dnr.wi.gov/topic/HealthWaste/Business.html>.



Bureau of Waste and Materials Management  
 Wisconsin Department of Natural Resources  
 PO Box 7921, Madison, WI 53707-7921  
[DNRWasteMaterials@wisconsin.gov](mailto:DNRWasteMaterials@wisconsin.gov)

**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): \_\_\_\_\_

Description of waste generated (e.g., waste acetone, coumadin, etc.)	Hazardous waste code	Generation rate (lbs./month)	Facility to which waste is shipped	Analysis available (✓)	Generator knowledge (✓)
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
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				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
Maximum quantity of waste generated per month <sup>1</sup> :		<div style="text-align: right; margin-right: 20px;">                     _____ lb/mo                      _____ lb/mo                 </div>			
Non-acute waste: Acute waste:					

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



## WISCONSIN DEPARTMENT OF NATURAL RESOURCES NOTICE OF FINAL GUIDANCE & CERTIFICATION

Pursuant to ch. 227, Wis. Stats., the Wisconsin Department of Natural Resources has finalized and hereby certifies the following guidance document.

### DOCUMENT ID

WA-19-1264-C

### DOCUMENT TITLE

Self-Audit Checklist (SQGs)

### PROGRAM/BUREAU

Waste and Materials Management

### STATUTORY AUTHORITY OR LEGAL CITATION

Ch. 291, Wis. Stats.

### DATE SENT TO LEGISLATIVE REFERENCE BUREAU (FOR PUBLIC COMMENTS)

October 14, 2019

### DATE FINALIZED

November 6, 2019

### DNR CERTIFICATION

*I have reviewed this guidance document or proposed guidance document and I certify that it complies with sections 227.10 and 227.11 of the Wisconsin Statutes. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is not explicitly required or explicitly permitted by a statute or a rule that has been lawfully promulgated. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is more restrictive than a standard, requirement, or threshold contained in the Wisconsin Statutes.*

A handwritten signature in black ink, appearing to read 'Joseph P. Van Rossum', is written over a horizontal line.

November 6, 2019

Signature

Date