

COMPLIANCE PITFALLS

- Waste minimization
- Housekeeping
- Segregate waste
- Training
- Records
- Dedicated staff



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COMPLIANCE CHECKLIST

Requirement & Regulatory Citation	Requirement
A Generator must not treat, store, dispose of, transport, or offer for transportation, hazardous waste without having received an EPA identification number from the Department. [40 CFR 262.18(a)]	Did Generator have an EPA ID number prior to treating, storing, disposing of, transporting, or offering for transportation HW?. [40 CFR 262.18(a)]
A Generator must not offer its hazardous waste to transporters or to treatment, storage, or disposal facilities that have not received an EPA identification number. [40 CFR 262.18(c)]	Did Generator offer HW to transporters or to TSD facilities that have received an EPA ID number? . [40 CFR 262.18(c)]
A Generator may use manifests printed by any source so long as the source of the printed form has received approval from EPA to print the manifest under paragraphs (c) and (e) of this section. A registered source may be a: (i) State agency; (ii) Commercial printer; (iii) Hazardous Waste Generator, Transporter or TSD; or (iv) Hazardous Waste Broker or other preparer who prepares or arranges shipments of hazardous waste for transportation. [40 CFR 262.21(g)(1)]	Did Generator use EPA approved manifest forms for shipments of hazardous waste?. [40 CFR 262.21(g)(1)]
A generator may prepare an electronic manifest for the tracking of hazardous waste shipments involving any RCRA hazardous waste only if it is known at the time the manifest is originated that all waste handlers named on the manifest participate in the electronic manifest system. [40 CFR 262.24(c)]	Did Generator using an electronic manifest ensure that all waste handlers named on the manifest are participants in the electronic manifest system? [40 CFR 262.24(c)]

QUESTIONS?

