UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 11 2019

REPLY TO THE ATTENTION OF

Mr. David Hockin
Waste Management Team Leader
Fermi National Accelerator Laboratory
Pine Street at Kirk Road
Batavia, Illinois 60510

Re: Compliance Evaluation Inspection
EPA I.D. No.: IL6 890 030 046

Dear Mr. Hockin:

On September 24, 2018, a representative of the U.S. Environmental Protection Agency inspected Fermi National Accelerator Laboratory (Fermi) located in Batavia, Illinois. The purpose of the inspection was to evaluate Fermi's compliance with hazardous waste, universal waste, and used oil requirements of the Resource Conservation and Recovery Act (RCRA). We have enclosed a copy of our inspection report for your reference.

Our inspection did not detect violations of the specific RCRA requirements evaluated. Please note that this evaluation is based on observations made by, and information disclosed to, EPA during the inspection. This letter does not relieve [Site Name] of its obligation to comply with RCRA and other environmental regulations and statutes. Thank you for your cooperation.

If you have any questions or concerns regarding this matter, please contact Robert Smith, of my staff, at (312) 886-7568.

Sincerely,

Michael Cunningham, Chief
RCRA Compliance Section 1

Enclosure

cc: Mr. Todd Marvel (Todd.Marvel@Illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME:	Fermi National Accelerator Laboratory
U.S. EPA ID. No.:	IL6 890 030 046
LOCATION ADDRESS:	Pine Street at Kirk Road Batavia, Illinois 60510
DATE OF INSPECTION:	September 24, 2018
U.S. EPA INSPECTOR:	Robert Dean Smith Environmental Scientist

PREPARED BY:

Robert Dean Smith
RCRA Compliance Section 1

2/12/2019
Date:

REVIEWED BY:

Michael Cunningham, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

02/12/19
Date:

Purpose of Inspection
This inspection was an evaluation of the Fermi National Accelerator Laboratory's (Fermilab) compliance with hazardous waste, used oil, and universal waste regulations found at Illinois Administrative Code and the Code of Federal Regulations (CFR) as well as the Facility's RCRA Permit. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as large quantity generator (LQG) and the Facility has been issued a Hazardous Waste Permit by the State of Illinois.

Participants

Inspector:
Robert Dean Smith, LPG, Environmental Scientist, EPA

Site Representative:
David Hockin, Waste Management Team Leader, ESH&Q Section

Introduction
On September 24, 2018, I arrived at the site at approximately 10:00 AM. I introduced myself, presented my inspector credentials, and business card, and described the purpose and process by which I intended to conduct the inspection. Mr. Hockin provided me with a description of the site operations, led the tour and provided me with the records I requested for review.

I informed Mr. Hockin that Fermilab could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Fermilab did not make a CBI claim on the information gathered during the inspection.

Site Description
Fermilab is home to the Tevatron, the world's highest energy particle accelerator. With this, and a two-mile long main injector particle accelerator, Fermilab conducts high energy physics research into the acceleration and collision of subatomic particles. The Tevatron is four miles in circumference.

Fermilab occupies 6,800 acres in DuPage and Kane Counties near Batavia, Illinois. The campus is comprised of an office building, research centers, residential areas, as well as support buildings.

The Illinois Environmental Protection Agency (IEPA) most recently issued a RCRA Part B Permit with an effective date of January 31, 2017 and will expire on January 31, 2027. The permit is for the storage of hazardous waste. The US EPA issued a component of the RCRA Part B Permit which addresses regulations not authorized to the State of Illinois.

Fermilab stores hazardous waste for up to one year in Building WS-3 which is designated the Hazardous Waste Storage Facility (HWSF). The HWSF is a three building (WS-1, WS-2, and WS-3) complex also referred to as Site 55. Site 55 is situated behind a 6-foot tall chain link fence. The gate to the complex is locked. WS-2 and WS-2 is used to store non-hazardous waste, product, and equipment. WS-4 is a RCRA-closed, former flammable waste storage area. The

maximum amount of hazardous waste that can be in storage in WC-3 is 6975 gallons (equivalent to 126 55-gallon drums). Within Site 55 is a paved area that can be used to store drummed waste.

Fermilab is also a Large Quantity Generator of Hazardous Waste. There are many generation sites throughout the facility. Hazardous waste is generated from research, operation and maintenance of equipment, or from remediation. Fermilab has many Satellite Accumulation Areas (SAA). The generators contact ESH for pick-up of hazardous waste.

Fermilab is permitted to store 300 types of waste but the following are the waste codes that are common: D001, D002, D008, D009, D018, D035, and D039. Common listed hazardous waste codes are: P042, P105, U080, U226.

During the site description, Mr. Hockin provided a facility diagram to me, *see* Attachment A.

Site Tour

We (Mr. Hockin and I) traveled to Site 55 where hazardous waste is stored under a RCRA Permit as well as under generator requirements. We visited Buildings WS-1, WS-2E, WS-2W, and WS-3, the hardpan, and then we proceeded to The Village where hazardous waste is generated as well as stored in satellite accumulation containers.

We first entered WS-3, then we walked to WS-2 and finally to WS-1. Afterwards, we travelled to The Village. Our Site Tour started at 13:50 ended at 15:00.

Photograph: # 1
Date: September 24, 2018; 13:59
Location: WS-3, Site 55
Subject: view of the interior of the storage building. Two overpack drums of waste are observed in this photograph.

Photograph: # 2
Date: September 24, 2018; 14:02
Location: WS-2
Subject: Less than 90-day hazardous waste accumulation area. Various wastes in accumulation. All containers are closed, dated, and marked.

Photograph: # 3
Date: September 24, 2018; 14:09
Location: WS-2W
Subject: Stainless Steel Kleen, label indicates the liquid is Ph=1.

Photograph: # 4
Date: September 24, 2018; 14:10
Location: WS-2W
Subject: Five fiber drums containing hazardous waste rags. Dated: 9/19/18, 8/15/18, 9/19/18, 9/19/18, and 9/5/18. The containers are marked, labeled, and dated.

Photograph: # 5
Date: September 24, 2018; 14:14
Location: WS-1
Subject: Locker 3. Small containers stored within the locker. The containers are closed, marked, labeled and dated.

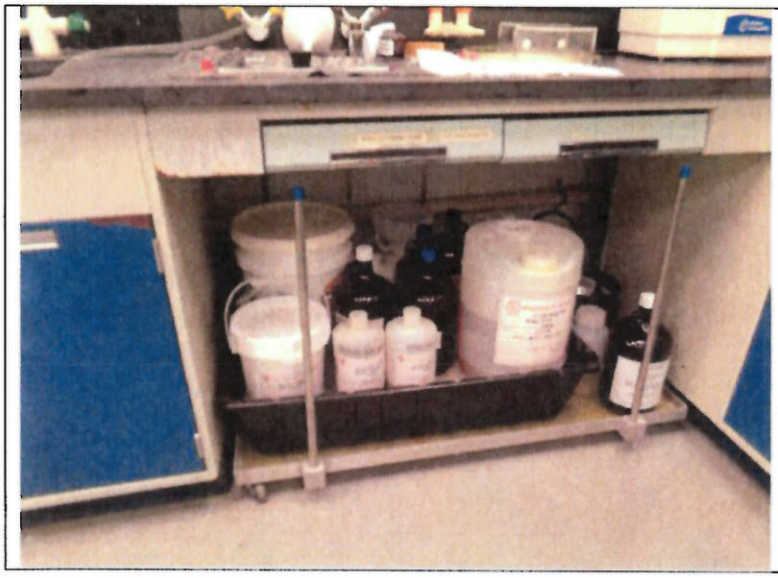
Photograph: # 6
Date: September 24, 2018; 14:15
Location: WS-1
Subject: Locker 5. Stored closed, marked, labeled, and dated.

Photograph: # 7
Date: September 24, 2018; 14:17
Location:
Subject: Locker 6, Acetic Acid. Stored closed, marked, labeled, and dated.

Photograph: # 8
Date: September 24, 2018; 14:19
Location:
Subject: Wooden boxes containing waste, dated 7/26/18, 7/18/18, and 8/2/18. The boxes are on secondary containment.

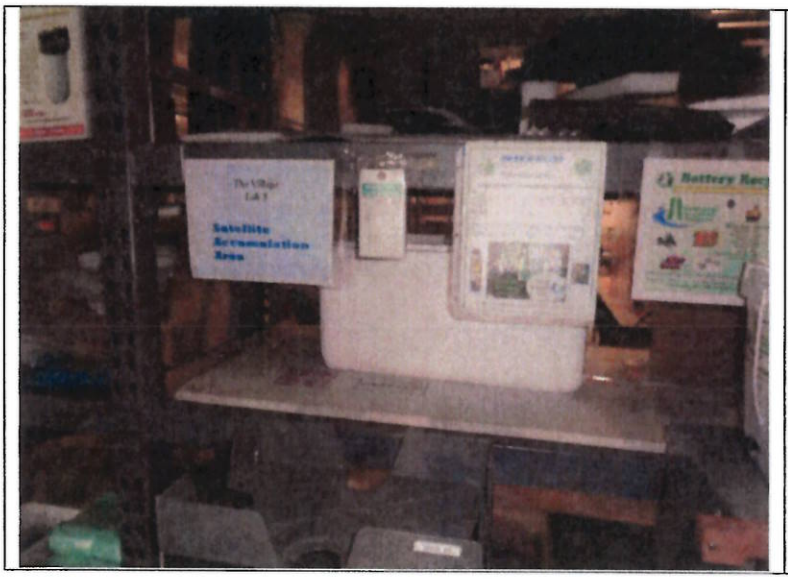
Photograph: # 9
Date: September 24, 2018; 14:30
Location: The Village, Lab 7.
Subject: Satellite Accumulation Area.

Photograph: # 10
Date: September 24, 2018; 14:34
Location: The Village, Lab 6.
Subject: Storage Locker



Photograph: # 11
Date: September 24, 2018; 14:36
Location: The Village, Lab 6.
Subject: Hazardous Waste in secondary containment.

Photograph: # 12
Date: September 24, 2018; 14:44
Location: The Village, Lab 5.
Subject: Hazardous waste storage locker. No waste is present.



Photograph: # 13
Date: September 24, 2018; 14:47
Location: The Village, Lab 3.
Subject: No waste is present; a recent pick-up removed all hazardous waste from storage.

Records Review
After an introductory discussion, I began to review the facility's paperwork.

Contingency Plan
I reviewed the Contingency Plan. The most recent revision was on 12/18/15. I confirmed that there were no changes from that date.

Closure Cost Estimate
I reviewed that closure cost estimate for Site 55. The closure cost estimate from 1992 was $100,000. Utilizing the parameters for inflation and other factors, the closure estimate for 2017 is $249,168.

Part B Permit
The facility is required to have a copy of its Part B Permit on hand. I was provided with the permit for review. The permit was complete.

Hazardous Waste Manifests
I started to review a 2018 Safety Kleen folder. Hazardous and non-hazardous manifests were reviewed.
I reviewed a 2017 Heritage Crystal Clean folder. A variety of wastes were shipped: waste oil, batteries, water jet sludge, asbestos, scintillator oil, alkaline batteries, used oil, D039, and lead batteries.
I reviewed Veolia manifests. Many of the Veolia manifests were for shipments of lab packed materials. Other materials shipped includes miscellaneous drums, non-PCB capacitors, and paint. The Veolia manifests reviewed were from 2018, 2017 and 2016; 11 manifests were reviewed in total.

Training Records
I reviewed records for Steve Corrigan, Dave Hockin, Dan Curatolo, and Greg Thompson. Amy Pavnica is a "new" employee who has been taking introductory hazardous waste training. Ms. Pavnica is new to the program but has been with Fermilab for several years.

Training categories include:
Chem Waste Generator, 40 CFR 262; Hazardous Waste Storage Facility, Emergency Responder Training, Hazardous Materials/Waste Transport, McCoy Training, and Waste Coordinator Training.

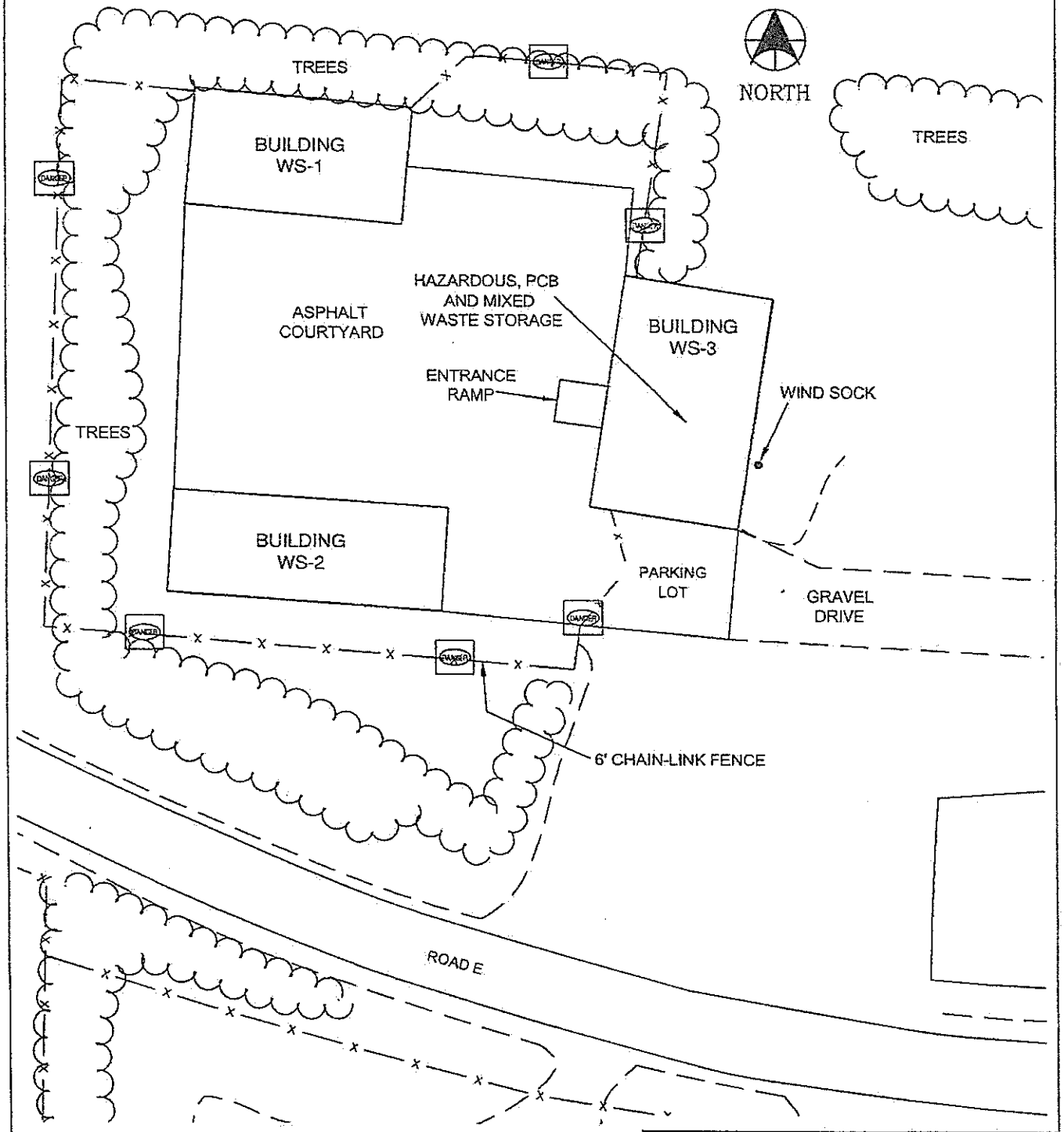
2018 Inspections
- Weekly WS-1, Container Storage Inspection Report. These reports are signed by Greg Thompson, David Hockin, Dan Curatolo, Amy Pavnica.
- Hazardous Waste Storage Facility, WS-2, inspections are conducted by Greg Thompson.
- WS-3 weekly inspections as well as the hardpan storage area are also conducted by Greg Thompson.
- Weekly Security and periphery inspections are conducted by Greg Thompson, David Hockin, Don Curatolo and Amy Pavnica.
- Monthly inspections for WS-1, WS-2E, WS-2W are conducted by Greg Thompson and David Hockin.
- Monthly WS-3 Emergency Response Equipment and PPE is conducted by Greg Thompson.
- Monthly Inspections for WS-3 Safety and Ancillary Equipment is conducted by Greg Thompson.

I identified no issues for the 2018 inspections. I spot checked the 2017 inspections. Jon Ylinan also conducted inspections in 2017.

Annual Report
Materials generated and shipped include: aerosols, lab packs. P042 (Epinephrine), D008 (Lead), paint from aerosols (D001, D035), petroleum based paint (D001), wipes and rags (D001, F003, F005), corrosive cleaning solution (D002), parts washer solution (D039), caustic solution for etching (D002), acid cleaning solution (D002), concentrated acid for etching (D002), Corrosive acid for etching (D002), and Flammable adhesive (D001).

Closing Conference
I stated that I identified no issues during the records review or in the Site Tour. The inspection concluded at approximately 3:00 PM.

Attachments
A. Site Diagram
B. Checklist



LEGEND:

DANGER = WARNING HAZARD SIGN

NOTE:

BUILDINGS WS-1 AND WS-2 ARE USED FOR NON-HAZARDOUS WASTE STORAGE AND TEMPORARY (<90-DAY) HAZARDOUS WASTE STORAGE

0 20 40 80

SCALE IN FEET

FERMILAB
KIRK ROAD & PINE STREET
BATAVIA, ILLINOIS

DRAWING 10
SITE 55 AREA DETAIL MAP

DATE:	Dec. 3, 2015
JOB NO.:	60398391
DRAWN BY:	CC
CHK'D BY:	LV
SCALE:	AS SHOWN

AECOM
100 SOUTH WACKER DRIVE, SUITE 500
CHICAGO, ILLINOIS 60606
PHONE: (312) 939-1000
FAX: (312) 939-4198

FERMILAB

ATTACHMENT A
Site Diagram

ATTACHMENT B
Checklist

Permit 486 9/24/2018 LLO CW 050 040 10:04 AM

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	PART 725: INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES	
	SUBPART A: GENERAL PROVISIONS	
	Section 725.101 Purpose, Scope and Applicability	
725.101(c)	Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ✓ No____ N/A____	
	Note: If "Yes", explain in the narrative.	
725.101(d)	Has the facility managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of Section 725.101(d)(1) through (5)? Yes ✓ No____ N/A____	725.101(d)
	SUBPART B: GENERAL FACILITY STANDARDS	
	Section 725.111 USEPA Identification Number	
725.111	Has the facility obtained a USEPA identification number? Yes ✓ No____ N/A____	725.111
	Section 725.112 Required Notices	
	Has the owner/operator of the facility provided the required notice: 105	
725.112(a)	a) upon receiving hazardous waste from a foreign source? Yes____ No____ N/A ✓	725.112(a)
725.112(b)	b) prior to transferring ownership/operational control of the facility? Yes____ No____ N/A ✓	725.112(b)
	Section 725.113 General Waste Analysis	
725.113(a)	Has the owner/operator obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No____ N/A____	
	Does the analysis contain all the necessary information to treat, store or dispose of the waste in accordance with Parts 725 and Part 728? Yes____ No____ N/A ✓	
	Has the analysis been repeated:	
	- when the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes____ No____ N/A ✓	725.113(a)
	- for off-site facilities, when the results of an on-site inspection indicate that the hazardous waste received at the facility does not match the accompanying manifest or shipping paper? Yes____ No____ N/A ✓	
	Has the owner/operator of an off-site facility inspected each hazardous waste shipment received at the facility to ensure that it matches the waste identified on the accompanying manifest or shipping paper? Yes____ No____ N/A ✓	
725.113(b)	Has the owner/operator developed a written waste analysis plan? Yes ✓ No____ N/A____	
	Is the plan available at the facility? permit Yes ✓ No____ N/A____	
	Does the owner/operator follow the procedures specified in the plan so as to comply with Section 725.113(a)? Yes ✓ No____ N/A____	
	Does the plan specify:	
	1) the parameters for which each hazardous waste will be analyzed and the rationale for selecting these parameters? Yes ✓ No____ N/A____	725.113(b)
	2) the test methods which will be used to test for these parameters? Yes ✓ No____ N/A____	
	3) the sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes ✓ No____ N/A____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	4) the frequency with which the initial analysis of the waste will be reviewed or repeated to ensure accurate and up-to-date analysis? Yes ✓ No____ N/A____ 5) for off-site facilities, the waste analyses that hazardous waste generators supply? Yes____ No____ N/A ✓ 6) the methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections: - ~~725.300~~ (Tanks)? - ~~725.325~~ (Surface Impoundments)? - ~~725.352~~ (Waste Piles)? - ~~725.373~~ (Land Treatment)? - ~~725.414~~ (Landfills)? - ~~725.441~~ (Incinerators)? - ~~725.475~~ (Thermal Treatment)? - ~~725.502~~ (Chemical, Physical and Biological Treatment)? - ~~725.934(d)~~ (Air Emissions - Process Vents)? - ~~725.963(d)~~ (Air Emissions - Equipment Leaks)? - ~~725.984~~ (Air Emissions - Subpart CC)? - ~~728.107~~ (Land Disposal Restrictions)? Yes____ No____ N/A ✓ **Note:** Circle appropriate Section. 7) for surface impoundments exempted from land disposal restrictions (LDR) under Section 728.104(a), the procedures and schedules for: - the sampling of impoundment contents - the analysis of test data: and - the annual removal of residues as specified in this Section? Yes____ No____ N/A ✓ 8) for owners and operators seeking an exemption to the air emission standards of 724.Subpart CC in accordance with Section 725.983: - if direct measurement is used for the waste determination are schedules and procedures for waste sampling and analysis of test data to verify exemption being maintained? Yes____ No____ N/A ✓ - if knowledge of the waste is being used to make this determination, is the documentation being maintained? Yes____ No____ N/A ✓	
725.113(c)	For off-site facilities, does the plan: 1) describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes____ No____ N/A ✓ 2) describe the sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes____ No____ N/A ✓ 3) describe the procedures that will be used to determine whether a hazardous waste generator or treater has added a biodegradable sorbent to the waste in the container? Yes____ No____ N/A ✓	725.113(c)
725.114(a)(b)	**Section 725.114 Security** Does the facility qualify for the exemption to the requirement to provide security specified in Section 725.114(a)? Yes____ No ✓ N/A____ Does a non-exempt facility have either : - a 24-hour surveillance system? Yes ✓ No____ N/A____ or - an artificial or natural barrier which completely surrounds the active portion of the facility; and Yes ✓ No____ N/A____ - gates or other entrances to the active portion of the facility Yes ✓ No____ N/A____	725.114(a)(b)
725.114(c)	Does a non-exempt facility have a sign with the words "Danger - Unauthorized Personnel Keep Out" posted at each entrance to the active portion of the facility? Yes ✓ No____ N/A____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	Note: Existing signs with legends other than the one above may be used if the legend indicates that access is restricted to authorized personnel only and that entry onto the active portion can be dangerous.	725.114(c)
	Section 725.115 General Inspection Requirements	
725.115(a)	Does the owner/operator inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or may lead to a release of hazardous waste constituents to the environment or a threat to human health or the environment? As Appropriate Yes ✓ No_____ N/A_____	
	Does the owner/operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? As Appropriate Yes ✓ No_____ N/A_____	725.115(a)
725.115(b)	Has the owner/operator developed and followed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Permit Yes ✓ No_____ N/A_____	
	Is the written schedule kept at the facility? Yes ✓ No_____ N/A_____	
	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ✓ No_____ N/A_____	
	Does the schedule specify at least the following minimum inspection frequency: - daily inspections of areas subject to spills? Yes ✓ No_____ N/A_____	725.115(b)
	- the items and frequencies, where applicable, called for in Sections: - 725.274 (Containers) - 725.293 (Tanks) - 725.295 (Tanks) - 725.326 (Surface Impoundments) - 725.447 (Incinerators) - 725.477 (Thermal Treatment) - 725.503 (Chemical, Physical and Biological Treatment) - 725.933 (Air Emissions - Process Vents) - 725.952 (Air Emissions - Equipment Leaks) - 725.953 (Air Emissions - Equipment Leaks) - 725.958 (Air Emissions - Equipment Leaks) - 725.984 through 725.990 (Air Emissions - Subpart CC) Yes_____ No_____ N/A_____	
	Note: Circle the applicable Section(s).	
725.115(c)	Has the owner/operator remedied any deterioration or malfunctions of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes_____ No_____ N/A ✓	
	Has the owner/operator taken immediate remedial action to address an imminent or existing hazard? Yes_____ No_____ N/A ✓	725.115(c)
725.115(d)	Does the owner/operator record inspections in a log or summary? Various inspections/schedules Yes ✓ No_____ N/A_____	
	Are these inspection records kept on file for at least 3 years from the date of the inspection? Very Complete Yes ✓ No_____ N/A_____	
	Does the inspection record include, at a minimum: - the date and time of the inspection? Yes ✓ No_____ N/A_____	
	- the name of the inspector? Yes ✓ No_____ N/A_____	725.115(d)
	- a notation of the observations made? Yes ✓ No_____ N/A_____	
	- the date and nature of any repairs or remedial actions? Yes ✓ No_____ N/A_____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.116(a)	**Section 725.116 Personnel Training** Does the facility have a training program? Yes ✓ No ____ N/A ____ Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes ✓ No ____ N/A ____ Is the program directed by a person trained in hazardous waste management procedures? Yes ✓ No ____ N/A ____ Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No ____ N/A ____ Does the program cover, at a minimum: - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No ____ N/A ____ - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? As appropriate Yes ✓ No ____ N/A ____ - key parameters for automatic waste feed cut-off systems? Yes ✓ No ____ N/A ____ - communications or alarm systems? Yes ✓ No ____ N/A ____ - response to fire or explosions? Yes ✓ No ____ N/A ____ - response to groundwater contamination incidents? Yes ✓ No ____ N/A ____ - shutdown of operations? Yes ✓ No ____ N/A ____	725.116(a)
725.116(b)	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? One "new" employee going through the program Yes ✓ No ____ N/A ____	725.116(b)
725.116(c)	Have facility personnel received an annual review of the initial training? Yes ✓ No ____ N/A ____	725.116(c)
725.116(d)	Are the following documents and records being maintained at the facility: 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No ____ N/A ____ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No ____ N/A ____ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No ____ N/A ____ 4) records that document that the training or job experience has been given to and completed by facility personnel? Yes ✓ No ____ N/A ____	725.116(d)
725.116(e)	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes ✓ No ____ N/A ____	725.116(e)
725.117(a)	**Section 725.117 General Requirements for Ignitable, Reactive or Incompatible Wastes** Are ignitable and reactive wastes protected from and separated from sources of ignition or reaction? Yes ✓ No ____ N/A ____ Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ✓ No ____ N/A ____	725.117(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.117(b)	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or commingling of incompatible wastes and materials being done so as not to threaten human health or the environment (e.g. fire, pressure, toxic gases, etc...)? Yes ✓ No_____ N/A_____	725.117(b)
	SUBPART C: PREPAREDNESS AND PREVENTION	
725.131	**Section 725.131 Maintenance and Operation of Facility** Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes ✓ No_____ N/A_____	725.131
725.132	**Section 725.132 Required Equipment** Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes ✓ No_____ N/A_____ b) a telephone or other device to summon emergency assistance from local authorities? Yes ✓ No_____ N/A_____ c) portable fire extinguisher(s), fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No_____ N/A_____ d) water at adequate volume and pressure for fire control? Yes ✓ No_____ N/A_____	725.132
725.133	**Section 725.133 Testing and Maintenance of Equipment** Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes ✓ No_____ N/A_____	725.133
725.134	**Section 725.134 Access to Communications or Alarm System** a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes ✓ No_____ N/A_____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes ✓ No_____ N/A_____	725.134
725.135	**Section 725.135 Required Aisle Space** Is the facility maintaining adequate aisle space? very little waste present. Yes ✓ No_____ N/A_____	725.135
725.137	**Section 725.137 Arrangements with Local Authorities** Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes ✓ No_____ N/A_____ - agreements designating the primary authority where more than one police or fire department might respond? Yes ✓ No_____ N/A_____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes ✓ No_____ N/A_____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No_____ N/A_____	725.137

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
	Section 725.151 Purpose and Implementation of Contingency Plan	
725.151(a)	Is the contingency plan available? Part of Permit — Yes ✓ No ___ N/A ___	
	If "No", skip to Section 725.155.	725.151(a)
	Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes ✓ No ___ N/A ___	
725.151(b)	Has there been a fire, explosion or release of hazardous waste? Yes ___ No ✓ N/A ___	
	If "Yes", has the contingency plan been carried out immediately? Yes ___ No ___ N/A ✓	725.151(b)
	Section 725.152 Content of Contingency Plan	
725.152(a)	Does the plan describe the actions required for response to:	
	- fires? Yes ✓ No ___ N/A ___	
	- explosions? Yes ✓ No ___ N/A ___	725.152(a)
	- releases? Yes ✓ No ___ N/A ___	
725.152(c)	Does the plan describe arrangements with:	
	- police and fire departments? Yes ✓ No ___ N/A ___	
	- hospitals? Yes ✓ No ___ N/A ___	
	- contractors? Yes ✓ No ___ N/A ___	725.152(c)
	- emergency response teams? Yes ✓ No ___ N/A ___	
725.152(d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes ✓ No ___ N/A ___	725.152(d)
725.152(e)	Does the plan identify all emergency equipment including:	
	- description? Yes ✓ No ___ N/A ___	
	- capability? Yes ✓ No ___ N/A ___	
	- location? Yes ✓ No ___ N/A ___	725.152(e)
	Is the list of emergency equipment up-to-date? Yes ___ No ___ N/A ___	
725.152(f)	Does the plan include:	
	- an evacuation plan? Yes ✓ No ___ N/A ___	
	- an evacuation signal? Yes ✓ No ___ N/A ___	725.152(f)
	- alternate evacuation routes? Yes ✓ No ___ N/A ___	
	Section 725.153 Copies of Contingency Plan	
725.153	Has the contingency plan (including all revisions) been:	
	a) maintained at the facility? Yes ✓ No ___ N/A ___	
	b) submitted to:	
	- police department? Yes ✓ No ___ N/A ___	725.153
	- fire department? Yes ✓ No ___ N/A ___	
	- hospital? Yes ✓ No ___ N/A ___	
	- emergency response teams? Yes ✓ No ___ N/A ___	
	Section 725.154 Amendment of Contingency Plan	
725.154	Has the contingency plan been reviewed and revised whenever:	
	a) regulations are revised? Yes ✓ No ___ N/A ___	
	b) the plan fails in an emergency? Yes ___ No ___ N/A ✓	
	c) the facility changes in a way that modifies the emergency response necessary? Yes ___ No ___ N/A ✓	725.154
	d) information regarding emergency coordinators changes? Yes ✓ No ___ N/A ___	
	e) information regarding equipment changes? Yes ___ No ___ N/A ✓	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.155	**Section 725.155 Emergency Coordinator** Is the emergency coordinator on-site or on call at all times? Yes ✓ No ___ N/A ___ Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes ✓ No ___ N/A ___ Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes ✓ No ___ N/A ___	725.155
725.156	**Section 725.156 Emergency Procedures** If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes ___ No ___ N/A ✓ **Note:** If the facility has had a release, explain in detail.	725.156
	SUBPART E: MANIFEST SYSTEM, RECORDKEEPING AND REPORTING	
725.171(a)	**Section 725.171 Use of Manifest System** Does the facility accept waste from off-site? Yes ✓ No ___ N/A ___ If "No", skip to Section 725.173. For each manifest reviewed, did the facility: 1) sign and date each copy? Yes ✓ No ___ N/A ___ 2) note any discrepancies? Yes ___ No ___ N/A ✓ 3) give one copy to the transporter? Yes ✓ No ___ N/A ___ 4) send one copy to the generator and one copy to the Agency within 30 days? Yes ✓ No ___ N/A ___ 5) retain one copy for 3 years? Yes ✓ No ___ N/A ___ Does the facility ship hazardous waste in bulk by water or rail? Yes ___ No ___ N/A ✓ If "Yes", were the procedures in Section 725.171(b) followed? Yes ___ No ___ N/A ✓ Does the facility initiate shipments of hazardous waste? Yes ✓ No ___ N/A ___ **Note:** If "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.	725.171(a)
725.171(d)	Has the owner/operator sent the required documentation to the USEPA within three working days of the receipt of a shipment subject to Section 722, Subpart H (Imports and Exports)? Yes ___ No ___ N/A ✓	725.171(d)
725.172(d)	**Section 725.172 Manifest Discrepancies** Were manifest discrepancies observed? Yes ___ No ✓ N/A ___ Has the owner/operator attempted to resolve discrepancies upon their discovery? Yes ___ No ___ N/A ✓ If not resolved within 15 days, has the owner/operator notified the Agency? Yes ___ No ___ N/A ✓	725.172(d)
725.173	**Section 725.173 Operating Record** a) Does the owner/operator have a written operating record at the facility? Yes ✓ No ___ N/A ___ b) Is the information recorded as it becomes available and maintained until closure? Yes ✓ No ___ N/A ___ b) Does the operating record contain the following: 1) description and quantity of each hazardous waste and the methods and dates of treatment, storage and disposal? Yes ✓ No ___ N/A ___	725.173

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation

2) location and quantity of each hazardous waste within the facility?
Yes ✓ No_____ N/A_____
- for disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area?
Yes_____ No_____ N/A ✓

3) records and results of waste analyses and trial tests performed as specified in the identified Sections?
Yes ✓ No_____ N/A_____

4) summary reports and details of all incidents requiring contingency plan implementation?
Yes_____ No_____ N/A ✓

5) inspection records [see Section 725.115(d)]?
Yes ✓ No_____ N/A_____

6) monitoring, testing or analytical data as required by:
- 725.190 (Groundwater Monitoring) — CA going on at site
- 725.194 (Groundwater Monitoring)
- 725.376 (Land Treatment)
- 725.378 (Land Treatment)
- 725.380(d)(1) (Land Treatment)
- 725.447 (Incinerators)
- 725.477 (Thermal Treatment)
- 725.934(c) through (f) (Air Emissions - Process Vents)
- 725.935 (Air Emissions - Process Vents)
- 725.963(d) through (i) (Air Emissions - Equipment Leaks)
- 725.964 (Air Emissions - Equipment Leaks)
- 725.983 through 725.990

Yes_____ No_____ N/A_____

Note: Circle appropriate Section.

FOD Facility

7) all closure cost estimates under Section 725.242?
Yes ✓ No_____ N/A_____
for disposal facilities, all post-closure cost estimates under Section 725.244?
Yes ✓ No_____ N/A_____

8) records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units under an extension of the effective date of land disposal restrictions under Section(s) 728.105, 728.106, 728.108 and 728.107(a)?
Yes_____ No_____ N/A ✓

9) for an off-site treatment facility, a copy of the notice, and certification and demonstration, required under Section 728.107 or 728.108?
Yes_____ No_____ N/A ✓

10) for an on-site treatment facility, the information contained in the notice, and certification and demonstration, required under Section 728.107 or 728.108?
Yes ✓ No_____ N/A_____

11) for an off-site land disposal facility, a copy of the notice, and certification and demonstration, required under Section 728.107 or 728.108?
Yes_____ No_____ N/A ✓

12) for an on-site land disposal facility, the information contained in the notice required of the generator or treatment facility under Section 728.107, except for the manifest numbers, and the certification and demonstration required under Section 728.107 or 728.108, if applicable?
Yes ✓ No_____ N/A_____

13) for an off-site storage facility, a copy of the notice, and certification and demonstration, required under Section 728.107 or 728.108?
Yes_____ No_____ N/A ✓

14) For an on-site storage facility, the information contained in the notice, and the certification and demonstration if applicable, required under Section 728.107 or 728.108?
Yes ✓ No_____ N/A_____

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.174(a)	**Section 725.174 Availability, Retention and Disposition of Records** Were all records and plans required under Part 725 made available for inspection? Yes ✓ No____ N/A____ Have all records been maintained during any unresolved enforcement action or as requested by the Director? Yes____ No____ N/A ✓ Upon closure of a land disposal facility, was the record of waste disposal location and quantities submitted to: - the Agency? Yes____ No____ N/A ✓ - the local land authority? Yes____ No____ N/A ✓	725.174(a)
725.175	**Section 725.175 Annual Report** Has the owner/operator submitted an annual report by March 1 of each year? Yes ✓ No____ N/A____	725.175
725.176	**Section 725.176 Unmanifested Waste Report** Does the facility accept hazardous waste from off-site? Yes____ No ✓ N/A ✓ If "No", skip to Section 725.177. Has the facility accepted waste from off-site for treatment, storage or disposal without a manifest or shipping papers? Yes____ No____ N/A____ Was the unmanifested waste exempt per Section 721.105? Yes____ No____ N/A____ Did the owner/operator complete an unmanifested waste report in accordance with the requirements of this Section? Yes____ No____ N/A____	725.176
725.177	**Section 725.177 Additional Reports** Has the owner/operator also reported to the Agency: a) releases, fires and explosions as specified in Section 725.156(j)? ✓ Yes____ No____ N/A____ b) groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? ✓ Yes____ No____ N/A____ c) facility closure as specified in Section 725.215? N Yes____ No____ N/A____ d) as otherwise required by Subparts AA, BB and CC of Part 725? ✓ Yes____ No____ N/A____ COMMENTS:	725.177

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	SUBPART G: CLOSURE AND POST-CLOSURE	
	Section 725.212 Closure Plan; Amendment of Plan	
725.212(a)	Was the most current facility closure plan available during the inspection? Yes_____ No_____ N/A_____	725.212(a)
	Was the closure plan submitted to the Agency within the time frames specified in this Section? Yes_____ No_____ N/A_____	
	Section 725.218 Post-Closure Care Plan	
725.218(a)	Was the most current facility post-closure plan available during the inspection? Yes_____ No_____ N/A_____	725.218(a)
	Was the post-closure plan submitted to the Agency within the time frames specified in this Section? Yes_____ No_____ N/A_____	
	SUBPART H: FINANCIAL REQUIREMENTS	
	Section 725.242 Cost Estimate for Closure	
725.242(a)	Has the owner/operator prepared a written estimate of the cost of closing the facility? Yes_____ No_____ N/A_____	725.242(a)
	Section 725.244 Cost Estimate for Post-Closure Care	
725.244(a)	Has the owner/operator prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? Yes_____ No_____ N/A_____	
	Comments:	725.244(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
725.271	**Section 725.271 Condition of Containers** If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes_____ No_____ N/A✓	725.271
725.272	**Section 725.272 Compatability of Waste with Container** Is the waste compatible with the container and/or liner? Yes✓ No_____ N/A_____	725.272
725.273(a)	**Section 725.273 Management of Containers** Are containers of hazardous waste always closed except to remove or add waste during storage? Yes✓ No_____ N/A_____	725.273(a)
725.273(b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes✓ No_____ N/A_____	725.273(b)
725.274	**Section 725.274 Inspections** Is the owner/operator inspecting the storage area(s) at least weekly, looking for leaks or deterioration? Yes✓ No_____ N/A_____ Is the storage area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes✓ No_____ N/A_____	725.274
725.276	**Section 725.276 Special Requirements for Ignitable or Reactive Waste** Are containers holding hazardous waste located at least 15 meters (50 feet) from the facility's property line? Yes✓ No_____ N/A_____ **Note:** See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	725.276
725.277	**Section 725.277 Special Requirements for Incompatible Wastes** Is the owner/operator complying with the requirements concerning incompatible wastes? Yes✓ No_____ N/A_____ Comments:	725.277

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.278	**Section 725.278 Air Emission Standards** Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____ Comments:	725.278
	SUBPART J: TANK SYSTEMS	
	Section 725.290 Applicability	
725.290	Does the facility store or treat hazardous waste in tanks? Yes_____ No_____ N/A_____ If "No", skip Subpart J. a) Tank systems that are used to store or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	
	Section 725.291 Assessment of Existing Tank Systems	
725.291(a)	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes_____ No_____ N/A_____	725.291(a)
725.291(b)	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the wastes? Yes_____ No_____ N/A_____ 3) existing corrosion protection measures? Yes_____ No_____ N/A_____ 4) documented age of the tank system? Yes_____ No_____ N/A_____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes_____ No_____ N/A_____	725.291(b)
725.291(c)	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes_____ No_____ N/A_____ **Note:** If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	725.291(c)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.292(a)	**Section 725.292 Design and Installation of New Tank Systems or Components** For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 7/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes_____ No_____ N/A_____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the waste(s) to be handled? Yes_____ No_____ N/A_____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes_____ No_____ N/A_____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes_____ No_____ N/A_____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes_____ No_____ N/A_____ * IRPE = Independent Registered Professional Engineer	
725.292(g)	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes_____ No_____ N/A_____	725.292(a) 725.292(g)
725.293(a)	**Section 725.293 Containment and Detection of Releases** Is secondary containment provided for any new tank system before being put into service? Yes_____ No_____ N/A_____ Does an existing tank, used to store F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes_____ No_____ N/A_____ For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes_____ No_____ N/A_____ For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes_____ No_____ N/A_____ or If the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes_____ No_____ N/A_____ For tanks that store wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes_____ No_____ N/A_____	725.293(a)
725.293(b)	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes_____ No_____ N/A_____ Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes_____ No_____ N/A_____	725.293(b)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.293(c)	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes_____ No_____ N/A_____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes_____ No_____ N/A_____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes_____ No_____ N/A_____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes_____ No_____ N/A_____ and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes_____ No_____ N/A_____ **Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	725.293(c)
725.293(d)	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes_____ No_____ N/A_____	725.293(d)
725.293(e)	Does the external liner system(s), vault system(s) and/or double-walled tanks meet the additional requirements identified in Section 725.293(e)? Yes_____ No_____ N/A_____	725.293(e)
725.293(f)	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c) except for: 1) aboveground piping (exclusive of flanges, joints, valves and connections) that are inspected daily? Yes_____ No_____ N/A_____ 2) welded flanges, joints and connections that are inspected daily? Yes_____ No_____ N/A_____ 3) sealless or magnetic coupling pumps and sealless valves that are inspected daily? Yes_____ No_____ N/A_____ 4) pressurized aboveground piping systems with automatic shut-off devices that are inspected daily? Yes_____ No_____ N/A_____	725.293(f)
725.293(i)	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes_____ No_____ N/A_____ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes_____ No_____ N/A_____ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes_____ No_____ N/A_____ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	725.293(i)
725.294(a)	**Section 725.294 General Operating Requirements** Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes_____ No_____ N/A_____	725.294(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.294(b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes_____ No_____ N/A_____	
	2) overfill prevention controls? Yes_____ No_____ N/A_____	725.294(b)
	3) sufficient freeboard in uncovered tanks? Yes_____ No_____ N/A_____	
725.294(c)	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
	Section 725.295 Inspections	
725.295(a)	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes_____ No_____ N/A_____	
	2) the aboveground portion of the tank system for corrosion or releases? Yes_____ No_____ N/A_____	725.295(a)
	3) data from monitoring equipment? Yes_____ No_____ N/A_____	
	4) the construction materials and the area immediately surrounding the external portion of the system? Yes_____ No_____ N/A_____	
725.295(b)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes_____ No_____ N/A_____	725.295(b)
725.295(c)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes_____ No_____ N/A_____	725.295(c)
	Section 725.296 Response to Leaks or Spills and Disposition of Tank Systems	
725.296	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using: prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes_____ No_____ N/A_____	
	b) removed applicable waste from the system within 24 hours of detection? Yes_____ No_____ N/A_____	725.296
	c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes_____ No_____ N/A_____	
725.296(d)	d) notified the Agency within 24 hours of detection of release? Yes_____ No_____ N/A_____	
	d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes_____ No_____ N/A_____	725.296(d)
	Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.296(e)	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes_____ No_____ N/A_____ e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes_____ No_____ N/A_____ e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes_____ No_____ N/A_____ e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes_____ No_____ N/A_____	
	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous waste without release for the intended life of the system? Yes_____ No_____ N/A_____	725.296(e)
	Note: If the owner/operator does not satisfy the requirements of subsections (c)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
	Section 725.297 Closure and Post-Closure Care	
725.297(a)	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes_____ No_____ N/A_____	725.297(a)
725.297(a)	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes_____ No_____ N/A_____	
725.297(b)	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes_____ No_____ N/A_____	725.297(b)
	Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	
725.297(c)	If the owner/operator has a tank system which does not have secondary containment that meets the requirements of Section 725.293(b) through (f), and which is not exempt from the secondary containment requirements in accordance with Section 725.293(g), has the owner/operator complied with items 1) through 5) in this Section? Yes_____ No_____ N/A_____	725.297(c)
	Section 725.298 Special Requirements for Ignitable or Reactive Waste	
725.298(a)	Are ignitable or reactive wastes placed in a tank system? Yes_____ No_____ N/A_____ If "No", skip to Section 725.299. Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes_____ No_____ N/A_____ - Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ or Is the waste stored or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes_____ No_____ N/A_____ or Is the tank used solely for emergencies? Yes_____ No_____ N/A_____	725.298(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.298(b)	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line (see NFPA 30)? Yes_____ No_____ N/A_____	725.298(b)
	Section 725.299 Special Requirements for Incompatible Wastes	
725.299	Are incompatible wastes/materials placed in the same tank? Yes_____ No_____ N/A_____ If "No", skip to Section 725.300.	
	Is the facility in compliance with Section 725.117(b)? Yes_____ No_____ N/A_____	725.299
	Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless the facility is in compliance with Section 725.117(b)? Yes_____ No_____ N/A_____	
	Section 725.300 Waste Analysis and Trial Tests	
725.300	Has the owner/operator performed additional waste analyses/trial tests as required in this Section whenever a tank system is to be used to chemically treat or store a hazardous waste that is substantially different from waste previously treated or stored in that tank system; or to chemically treat a hazardous waste with a substantially different process than any previously used in that tank system? Yes_____ No_____ N/A_____	725.300
	Comments:	
	Section 725.302 Air Emission Standards	
725.302	Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____	
	Comments:	725.302

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.321(a)	**SUBPART K: SURFACE IMPOUNDMENTS** N/A **Section 725.321 Design and Operating Requirements** Has the owner/operator complied with Section 724.321(c) for liners and leachater collection systems for each new or replacement unit, or lateral expansion of an existing unit? Yes_____ No_____ N/A_____	725.321(a)
725.321(b)	Has the owner/operator notified the Agency at least 60 days prior to receiving waste and filed a Part B permit application within 6 months of such notice? Yes_____ No_____ N/A_____	725.321(b)
	Note: If N/A is checked, provide a detailed explanation of why the facility is not subject to the requirements of Section 725.321(c) or (d) and skip to Section 725.322.	
725.321(f)	Does the surface impoundment have at least two feet of freeboard unless a certification is conducted in accordance with subsection (b)? Yes_____ No_____ N/A_____	725.321(f)
725.321(h)	Has the surface impoundment that is newly subject to this Part due to additional listings or characteristics, complied with subsections 725.321(a), (c) or (d) within 48 months after the promulgation of the new listing or characteristic? Yes_____ No_____ N/A_____	725.321(h)
	Section 725.322 Action Leakage Rates	
725.322(a)(b)	Has the owner/operator submitted an adequate proposed action leakage rate to the Agency? Yes_____ No_____ N/A_____	725.322(a)(b)
725.322(c)	Has the owner/operator determined if the action leakage rate has been exceeded? Yes_____ No_____ N/A_____	725.322(c)
	Section 725.323 Response Action	
725.323(a)	Has the owner/operator submitted an adequate response action to the Agency? Yes_____ No_____ N/A_____	725.323(a)
725.323(b)	If the flow rate into the leak detection system (LDS) exceeds the action leakage rate for any sump, has the owner/operator complied with Subsection 725.323(b)? Yes_____ No_____ N/A_____	725.323(b)
725.323(c)	To make the leak or remediation determinations in Subsections 725.323(b)(3), (4) and (5), has the owner/operator complied with Subsection 725.323(c)? Yes_____ No_____ N/A_____	725.323(c)
	Section 725.324 Containment System	
725.324	Are all earthen dikes covered with grass, shale or rock to minimize wind and water erosion and to preserve their structural integrity? Yes_____ No_____ N/A_____	725.324
	Section 725.325 Waste Analysis and Trial Tests	
725.325	Prior to using a surface impoundment to chemically treat a hazardous waste which is substantially different from waste previously treated in the surface impoundment, or chemically treat hazardous waste with a substantially different process than any previously used in that impoundment, has the owner/operator: 1) conducted waste analysis or trail treatment tests? Yes_____ No_____ N/A_____ 2) obtained written, documented information on similar operating conditions to show that this treatment will comply with Section 725.117(b)? Yes_____ No_____ N/A_____	725.325
	Section 725.326 Monitoring and Inspections	
725.326	Has the owner/operator inspected: 1) the freeboard level daily to ensure compliance with Section 725.322? Yes_____ No_____ N/A_____ 2) the surface impoundment at least once a week? Yes_____ No_____ N/A_____	725.326

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	Section 725.328 Closure and Post-Closure Care Note: Determine compliance with this Section only in conjunction with a closure verification inspection.	
725.328	Has the owner/operator closed the surface impoundment in accordance with an approved closure plan? Yes_____ No_____ N/A_____	
	Has the owner/operator followed an approved post-closure plan? Yes_____ No_____ N/A_____	725.328
	Section 725.329 Special Requirements for Ignitable or Reactive Wastes	
725.329	Has the impoundment been used solely for emergencies? Yes_____ No_____ N/A_____	
	If not, has the addition of ignitable or reactive waste to the impoundment been conducted in accordance with this Section? Yes_____ No_____ N/A_____	725.329
	Section 725.330 Special Requirements for Incompatible Wastes	
725.330	Has the owner/operator complied with the requirements concerning the management of incompatible wastes and materials contained in this Section? Yes_____ No_____ N/A_____	725.330
	Section 725.331 Air Emission Standards	
725.331	Is the owner or operator managing all hazardous waste placed in surface impoundments in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____	
	Comments:	725.331
	SUBPART L: WASTE PILES N/A	
	Section 725.351 Protection from Wind	
725.351	If the waste pile is subject to wind dispersal, has the owner/operator covered or managed the pile so that dispersal is controlled? Yes_____ No_____ N/A_____	725.351
	Section 725.352 Waste Analysis	
725.352(a)	If required, are wastes analyzed for compatibility prior to being added to the pile? Yes_____ No_____ N/A_____	725.352(a)
725.352(b)	Is the analysis conducted capable of differentiating (i.e. visual comparison of color and texture) between the types of hazardous waste the owner/operator places in the pile so that the mixing of incompatible wastes does not occur? Yes_____ No_____ N/A_____	725.352(b)
	Section 725.353 Containment	
725.353(a)	If leachate or runoff is a hazardous waste, has the owner/operator: 1) placed the pile on an impermeable base that is compatible with the waste? Yes_____ No_____ N/A_____ 2) designed, constructed, operated and maintained an adequate run-on control system? Yes_____ No_____ N/A_____ 3) designed, constructed, operated and maintained an adequate run-off management system? Yes_____ No_____ N/A_____ 4) emptied or otherwise managed expeditiously the run-on/run-off collection and holding facilities? Yes_____ No_____ N/A_____	725.353(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.353(b)	Is the pile protected from precipitation and run-on? Yes_____ No_____ N/A_____ Have liquids and wastes containing free liquids been placed in the pile? Yes_____ No_____ N/A_____	725.353(b)
	Note: If collected leachate or run-off is discharged to waters of the State, it is subject to the requirements of Section 12 of the Act as amended.	
	Section 725.354 Design Requirements	
725.354	Has the owner/operator met the requirements for liners and leachate collection systems prescribed in Section 724.351? Yes_____ No_____ N/A_____	725.354
	Section 725.356 Special Requirements for Ignitable and Reactive Waste	
725.356	Has the addition of ignitable or reactive waste to the pile been conducted in accordance with this Section? Yes_____ No_____ N/A_____	725.356
	Section 725.357 Special Requirements for Incompatible Wastes	
725.357	Has the owner/operator complied with the requirements concerning the management of incompatible wastes or incompatible wastes and materials unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____	725.357
	Section 725.358 Closure and Post-Closure Care	
	Note: Determine compliance with this Section only in conjunction with a closure verification inspection.	
725.358	Has the facility been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.358
	SUBPART M: LAND TREATMENT N/A	
	Section 725.372 ~~General~~ Operating Requirements	
725.372	a) Can the waste being placed in or on the land treatment facility be made less hazardous or non-hazardous? Yes_____ No_____ N/A_____	
	b) Has the owner/operator designed, constructed, operated and maintained an adequate run-on control system? Yes_____ No_____ N/A_____	725.372
	c) Has the owner/operator designed, constructed, operated and maintained an adequate run-off management system? Yes_____ No_____ N/A_____	
	d) Has the owner/operator emptied or otherwise managed expeditiously the run-on/run-off collection and holding facilities? Yes_____ No_____ N/A_____	
	e) If the treatment zone contains particulate matter which may be subject to wind dispersal, is the owner/operator managing the unit to control wind dispersal? Yes_____ No_____ N/A_____	
	Section 725.373 Waste Analysis	
725.373	Prior to placing hazardous waste in or on a land treatment facility, has the owner/operator: a) determined the concentration of any substances which exceed the maximum concentrations contained in Table 1 of Section 724.124? Yes_____ No_____ N/A_____	
	b) determined the concentration of any substances which caused the waste to be listed as a hazardous waste in Part 721, Subpart D? Yes_____ No_____ N/A_____	725.373
	c) if food chain crops are grown, determined the concentrations in the waste of arsenic, cadmium, lead and mercury, unless the owner/operator has written documented data that show that the constituent is not present? Yes_____ No_____ N/A_____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.376	**Section 725.376 Food Chain Crops** If food chain crops are or will be grown, has the owner/operator made the required notice under Section 725.376(a)? Yes_____ No_____ N/A_____ Has the owner/operator complied with the requirements of Section 725.376(b) and (c) concerning the growing of food chain crops on land treatment facilities? Yes_____ No_____ N/A_____	725.376
725.378	**Section 725.378 Unsaturated Zone (Zone of Aeration) Monitoring** Does the owner/operator have a written unsaturated zone monitoring plan (maintained at the facility) as specified in this Section? Yes_____ No_____ N/A_____ Has the owner/operator implemented the unsaturated zone monitoring plan? Yes_____ No_____ N/A_____	725.378
725.379	**Section 725.379 Recordkeeping** Has the owner/operator included the dates and rates of application of hazardous waste in the operating record? Yes_____ No_____ N/A_____	725.379
725.380	**Section 725.380 Closure and Post-Closure** **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection. Has the land treatment facility been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.380
725.381	**Section 725.381 Special Requirements for Ignitable or Reactive Wastes** Has the application of ignitable or reactive waste to the treatment zone been conducted in accordance with this Section? Yes_____ No_____ N/A_____	725.381
725.382	**Section 725.382 Special Requirements for Incompatible Wastes** Has the owner/operator complied with the requirements concerning the management of incompatible wastes or incompatible wastes and materials unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____	725.382
725.401	**SUBPART N: LANDFILLS** N/A **Section 725.401 Design Requirements** a) Has the owner/operator met the requirements for liners and leachate collection systems installed in accordance with Section 724.401 for each new unit, lateral expansion of a unit, and each replacement of an existing unit or lateral expansion? Yes_____ No_____ N/A_____ b) Has the owner/operator of each unit referred to in subsection (a) above notified the Agency at least 60 days prior to receiving waste? Yes_____ No_____ N/A_____ Has the owner/operator of each facility submitting notice filed a Part B application within 6 months of the receipt of such notice? Yes_____ No_____ N/A_____ f) Has the owner/operator designed, constructed, operated and maintained an adequate run-on control system? Yes_____ No_____ N/A_____ g) Has the owner/operator designed, constructed, operated and maintained an adequate run-off management system? Yes_____ No_____ N/A_____ h) Has the owner/operator emptied or otherwise managed expeditiously the run-on/run-off collection and holding facilities? Yes_____ No_____ N/A_____ i) If the landfill contains hazardous waste which may be subject to wind dispersal, is the owner/operator managing the unit to control wind dispersal? Yes_____ No_____ N/A_____	725.401
725.402(a)	**Section 725.402 Action Leakage Rates** Has the owner/operator submitted an adequate proposed action leakage rate to the Agency? Yes_____ No_____ N/A_____	725.402(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.402(c)	Has the owner/operator determined if the action leakage rate has been exceeded? Yes_____ No_____ N/A_____	725.402(c)
	Section 725.403 Response Actions	
725.403(a)	Has the owner/operator submitted an adequate proposed action leakage rate to the Agency? Yes_____ No_____ N/A_____	725.403(a)
725.403(b)	If the flow rate into the leak detection system (LDS) exceeds the action leakage rate for any sump, has the owner/operator complied with subsection 725.403(b)? Yes_____ No_____ N/A_____	725.403(b)
725.403(c)	To make the leak or remediation determination in subsections 725.403(b)(3), (4) and (5), has the owner/operator complied with subsection 725.403(c)? Yes_____ No_____ N/A_____	725.403(c)
	Section 725.404 Monitoring and Inspection	
725.404(a)	Has the owner/operator recorded the amount of liquids removed from each LDS sump at least once a week during the active and closure period? Yes_____ No_____ N/A_____	725.404(a)
725.404(b)	Has the owner/operator recorded the amount of liquids removed from each sump after final cover is installed, according to subsection 725.404(b)? Yes_____ No_____ N/A_____	725.404(b)
	Section 725.409 Surveying and Recordkeeping	
725.409	Has the owner/operator maintained the following in the facility's operating record: a) a map showing the exact location and dimensions, including depth of each cell with respect to permanently surveyed bench marks; and Yes_____ No_____ N/A_____ b) the contents of each cell and the approximate location of each hazardous waste type within each cell? Yes_____ No_____ N/A_____	725.409
	Section 725.410 Closure and Post-Closure **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection.	
725.410(a)	Has the landfill been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.410(a)
725.410(b)	Has the owner/operator conducted post-closure care and monitoring in accordance with an approved post-closure plan? Yes_____ No_____ N/A_____	725.410(b)
	Section 725.412 Special Requirements for Ignitable and Reactive Waste **Note:** Refer to Section 725.416 for the requirements for the disposal of small containers of hazardous waste in overpacked drums (lab packs).	
725.412	Have ignitable or reactive wastes been treated, rendered or mixed before or immediately after placement in the landfill so that the resulting waste, mixture or dissolution or material no longer meets the definition of ignitable or reactive waste in 721.121 or 721.123 and complies with Section 725.117(b)? Yes_____ No_____ N/A_____ Have ignitable wastes in containers been disposed of in the landfill so that they: 1) are handled and placed so as to avoid heat, sparks, rupture or any other condition which might cause ignition? Yes_____ No_____ N/A_____ 2) are covered daily with soil or other non-combustible material to minimize potential ignition of the waste? Yes_____ No_____ N/A_____ 3) are not disposed of in cells that contain or will contain other wastes which may generate heat sufficient to cause ignition of the waste? Yes_____ No_____ N/A_____ Are containers of ignitable waste disposed of in the landfill non-leaking? Yes_____ No_____ N/A_____	725.412

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.413	**Section 725.413 Special Requirements for Incompatible Wastes** Has the owner/operator complied with the requirements of 725.117(b) in regard to landfilling of incompatible wastes or incompatible wastes and containers? Yes_____ No_____ N/A_____	725.413
725.414(b)	**Section 725.414 Special Requirements for Liquid Wastes** Has the owner/operator placed bulk or non-containerized liquid hazardous waste or hazardous waste containing free liquids (whether or not absorbents have been added) in the landfill? Yes_____ No_____ N/A_____	725.414(b)
725.414(c)	Have containers holding free liquids complied with the requirements in 725.414(c) prior to being placed in the landfill? Yes_____ No_____ N/A_____	725.414(c)
725.414(d)	Has the owner/operator used the Paint Filter Liquid Test as described in SW-846 to demonstrate the presence or absence of free liquids in either a containerized or bulk liquid? Yes_____ No_____ N/A_____	725.414(d)
725.414(e)	Has any liquid which is not a hazardous waste been placed in the landfill? Yes_____ No_____ N/A_____ **Note:** A "Yes" answer indicates non-compliance with this Section and with Section 729.311.	725.414(e)
725.414(f)	Are the sorbents used to treat free liquids to be disposed of in a landfill non-biodegradable? Yes_____ No_____ N/A_____	725.414(f)
725.414(g)	Has the owner/operator obtained authorization pursuant to Section 709.401(a) for the disposal of liquid wastes or wastes containing free liquids? Yes_____ No_____ N/A_____ **Note:** See also Section 709.520(c).	725.414(g)
725.415	**Section 725.415 Special Requirements for Containers** Are the containers, unless very small, such as an ampule, being placed in the landfill: a) at least 90% full? Yes_____ No_____ N/A_____ b) crushed, shredded or similarly reduced in volume to the maximum extent practical? Yes_____ No_____ N/A_____	725.415
725.416	**Section 725.416 Disposal of Small Containers of Hazardous Waste in Overpacked Drums (Lab Packs)** Have the lab packs been placed in a landfill in accordance with Section 725.416(a) through (g)? Yes_____ No_____ N/A_____	725.416
	SUBPART O: INCINERATORS N/A **Section 725.440 Applicability** **Note:** If the owner/operator claims to be exempt from the requirements of this Subpart and has documented in writing that the waste to be burned is identified in subsection (b) and that it would not reasonably be expected to contain any of the hazardous constituents listed in Part 721, Appendix H, then the facility is not regulated under this Subpart, except for Section 725.451 (Closure).	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.441	**Section 725.441 Waste Analysis** Has the owner/operator obtained analyses of wastes prior to the first time they are burned in the incinerator to enable him to establish steady state operating conditions and to determine the types of pollutants which might be emitted? Yes_____ No_____ N/A_____ Does the waste analysis include at least: a) heating value of the waste? Yes_____ No_____ N/A_____ b) halogen and sulfur content of the waste? Yes_____ No_____ N/A_____ c) lead and mercury content of the waste, unless written documentation is present to show that the elements are not present? Yes_____ No_____ N/A_____ Note: As required by Section 725.173, the owner/operator must place the results from each waste analysis or the documented information in the operating record of the facility.	725.441
725.445	**Section 725.445 General Operating Requirements** Are wastes fed to the incinerator only when it is at steady state (normal) conditions of operation, including temperature and air flow? Yes_____ No_____ N/A_____	725.445
725.447	**Section 725.447 Monitoring and Inspections** Has the owner/operator conducted the following monitoring and inspections when incinerating hazardous waste: a) existing instruments which relate to combustion and emission control every 15 minutes? Yes_____ No_____ N/A_____ b) the complete incinerator and associated equipment (pumps, valves, conveyors, pipes, etc.) at least daily for leaks, spills and fugitive emissions and all emergency shutdown controls and system alarms to assure proper operations? Yes_____ No_____ N/A_____	725.447
725.451	**Section 725.451 Closure** Note: Determine compliance with this Section only in conjunction with a closure verification inspection. Has the incinerator been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____ Note: The incinerator may also be a generator of hazardous waste.	725.451
725.452	**Section 725.452 Interim Status Incinerators Burning Particular Hazardous Wastes** Prior to burning hazardous waste numbers F020, F021, F022, F023, F026 or F027, has the owner/operator received a certification from the Agency that they meet the performance standards of Part 724, Subpart O, and have they followed the procedures in Section 725.452(b)(1)? Yes_____ No_____ N/A_____	725.452
725.473	**SUBPART P: THERMAL TREATMENT** N/A **Section 725.473 General Operating Requirements** Are wastes fed into the thermal treatment process only when it is at a steady state (normal) condition of operation, including temperature? Yes_____ No_____ N/A_____ Are batch processes fed only after a complete thermal cycle? Yes_____ No_____ N/A_____	725.473

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.475	**Section 725.475 Waste Analysis** Has the owner/operator obtained analyses of wastes prior to the first time they are thermally treated to enable him to establish steady state operating conditions and to determine the types of pollutants which might be emitted? Yes_____ No_____ N/A_____ Does the waste analysis include at least: a) heating value of the waste? Yes_____ No_____ N/A_____ b) halogen and sulfur content of the waste? Yes_____ No_____ N/A_____ c) lead and mercury content of the waste, unless written documentation is present to show that the elements are not present? Yes_____ No_____ N/A_____	725.475
725.477	**Section 725.477 Monitoring and Inspection** Has the owner/operator conducted the following monitoring and inspections when thermally treating hazardous waste: a) existing instruments which relate to combustion and emission control every 15 minutes? Yes_____ No_____ N/A_____ b) the stack plume emissions at least hourly for normal appearance (color and opacity)? Yes_____ No_____ N/A_____ c) the complete thermal treatment process and associated equipment (pumps, valves, conveyors, pipes, etc.) at least daily for leaks, spills and fugitive emissions and all emergency shutdown controls and system alarms to assure proper operations? Yes_____ No_____ N/A_____	725.477
725.481	**Section 725.481 Closure** **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection. Has the thermal treatment unit been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.481
725.482	**Section 725.482 Open Burning; Waste Explosives** Does the owner/operator open burn waste explosives in accordance with this Section? Yes_____ No_____ N/A_____	725.482
725.483	**Section 725.483 Interim Status Thermal Treatment Devices Burning Particular Hazardous Wastes** Has the owner/operator of a thermal treatment process burning hazardous waste numbers F020, F021, F022, F023, F026 or F027 received a certification from the Agency that they can meet the performance standards of Part 724, Subpart O? Yes_____ No_____ N/A_____	725.483
	SUBPART O: CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT	
	Section 725.500 Applicability **Note:** Chemical physical and biological treatment of hazardous waste in tanks, surface impoundments and land treatment facilities must be conducted in accordance with Subparts J, K and M respectively. Facilities that treat hazardous waste by chemical, physical and biological methods in other than tanks, surface impoundments and land treatment facilities are subject to the regulations of this Subpart.	
725.501	**Section 725.501 General Operating Requirements** Is the chemical, physical or biological treatment of hazardous waste being conducted in compliance with Section 725.117(b)? Yes_____ No_____ N/A_____	
	Are only hazardous waste treatment reagents which will not cause the treatment process or equipment to rupture, leak, corrode or otherwise fail before the end of its intended life being placed in the treatment process or equipment? Yes_____ No_____ N/A_____ Where hazardous waste is continuously fed into a treatment process or equipment, is the process or equipment equipped with a means to stop this inflow? Yes_____ No_____ N/A_____	725.501

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.502	**Section 725.502 Waste Analysis and Trial Tests** Has the process, equipment or hazardous waste being treated changed? Yes_____ No_____ N/A_____ If "Yes", has the owner/operator: 1) conducted a waste analysis and trial treatment tests (e.g., bench scale or pilot plant scale tests)?; or Yes_____ No_____ N/A_____ 2) obtained written documented information on similar treatment of similar waste under similar operating conditions? Yes_____ No_____ N/A_____	725.502
725.503	**Section 725.503 Inspections** Is the owner/operator inspecting, where present: a) discharge control equipment and safety equipment at least once each operating day? Yes_____ No_____ N/A_____ b) data gathered from monitoring equipment at least once each operating day? Yes_____ No_____ N/A_____ c) the construction materials of the treatment process or equipment at least weekly to detect corrosion or leaking of fixtures or seams? Yes_____ No_____ N/A_____ d) the construction materials of, and the area immediately surrounding discharge confinement structures at least weekly to detect erosion or obvious signs of leakage? Yes_____ No_____ N/A_____	725.503
725.504	**Section 725.504 Closure** **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection. Has the chemical, physical or biological treatment unit been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.504
725.505	**Section 725.505 Special Requirements for Ignitable or Reactive Wastes** Has the owner/operator complied with this Section for ignitable and/or reactive wastes? Yes_____ No_____ N/A_____	725.505
725.506	**Section 725.506 Special Requirements for Incompatible Wastes** Has the owner/operator complied with this Section for incompatible wastes? Yes_____ No_____ N/A_____ Comments:	725.506

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	SUBPART R: UNDERGROUND INJECTION	
	Section 725.530 Applicability	
725.530	Has the owner/operator disposed of hazardous waste in a Class I [as defined in Section 704.106(a)] or Class IV [as defined in Section 704.106(d)] injection well that meets the requirements of this Subpart? Yes_____ No_____ N/A_____	725.530
	Note: In addition to the requirements of Subparts A through E of this Part, the owner/operator of a facility that disposes of hazardous waste by underground injection ultimately must comply with the requirements of Sections 725.531 through 725.537 which are reserved at this time. USEPA intends to submit proposed regulations at a later date that would establish those requirements.	
	SUBPART W: DRIP PADS	
	Section 725.541 Assessment of Existing Drip Pad Integrity **Note:** Existing drip pads are those constructed before December 6, 1990.	
725.541(a)	Has the owner/operator of an existing drip pad made an evaluation of the drip pad to determine that it meets all requirements of this Subsection, except the requirements for liners and leak detection systems of Section 725.543(b)? Yes_____ No_____ N/A_____ - has the owner/operator obtained a written assessment of the drip pad, reviewed and certified by an independent registered professional engineer (IRPE)? Yes_____ No_____ N/A_____ - has this assessment been reviewed, updated and recertified annually until all upgrades, repairs or modifications are completed? Yes_____ No_____ N/A_____ - does the evaluation justify and document the age of the drip pad and the extent to which the drip pad meets each of the design and operating standards of Section 725.543(b)? Yes_____ No_____ N/A_____	725.541(a)
725.541(b)	Has the owner/operator developed a written plan for upgrading, repairing and modifying the drip pad to meet the requirements of Section 725.543(b)? Yes_____ No_____ N/A_____ - has this plan been submitted to the Agency no later than two (2) years before the date that all repairs, upgrades and modifications will be completed? Yes_____ No_____ N/A_____	
	Note: This plan must describe all changes made to the drip pad in sufficient detail to document compliance with all requirements of Section 725.543 and must document the age of the drip pad to the extent possible. This plan must be reviewed by an IRPE.	725.541(b)
	Have all upgrades, repairs and modifications been completed in accordance with the requirements of subsections (b)(1), (b)(2) and (b)(3)? Yes_____ No_____ N/A_____	
725.541(c)	Has the facility, upon completion of all repairs, upgrades and modifications, submitted the as-built drawings for the drip pad, together with certification by an IRPE to the Agency? Yes_____ No_____ N/A_____	725.541(c)
725.541(d)	If the drip pad is found to be leaking or unfit for use, has the owner/operator complied with the provisions of Section 725.543(m) or 725.545? Yes_____ No_____ N/A_____ Upon completion of all upgrades, repairs and modifications, has the owner/operator submitted to the Agency, the as-built drawings and certification by an IRPE attesting that the drip pad conforms to the drawings? Yes_____ No_____ N/A_____ If the drip pad is found to be leaking or unfit for use, has the owner/operator complied with the provisions of Section 725.543(m) or closed the drip pad in accordance with Section 725.545? Yes_____ No_____ N/A_____	725.541(d)
	Section 725.542 Design and Installation of New Drip Pads	
725.542	Has the owner or operator of a new drip pad ensured that the pad is designed, installed and operated in accordance with the requirements of Sections 725.543, 725.544 and 725.545? Yes_____ No_____ N/A_____	725.542

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.543(a)	**Section 725.543 Design and Operating Requirements** Has the drip pad(s) met the following requirements: 1) constructed of material other than earthen material, wood or asphalt (unless the asphalt is structurally supported)? Yes_____ No_____ N/A_____ 2) sloped to free-drain liquid to the associated collection system? Yes_____ No_____ N/A_____ 3) curbed or bermed around the perimeter? Yes_____ No_____ N/A_____ 4) made impermeable by June 24, 1993 (e.g., concrete pads must be sealed or covered with an impermeable material)? Yes_____ No_____ N/A_____ 5) be of sufficient structural strength and thickness to prevent failure due to physical contact, climate, stress of installation and daily operation? Yes_____ No_____ N/A_____	725.543(a)
725.543(b)	Does the new or existing drip pad have the following: 1) a synthetic liner below the drip pad that is constructed and installed to prevent leakage from the drip pad? Yes_____ No_____ N/A_____ A) constructed of materials that have appropriate chemical properties and sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with waste or drip pad leakage, climate, the stress of installation and the stress of daily operation? Yes_____ No_____ N/A_____ B) placed upon a foundation or base capable of providing support to the liner and resistance to pressure gradients above and below the liner to prevent failure of the liner due to settlement, compression or uplift? Yes_____ No_____ N/A_____ C) installed to cover all surrounding earth that could come in contact with the waste or leakage? Yes_____ No_____ N/A_____ 2) a leak detection system immediately above the liner that is designed, constructed, maintained and operated to detect leakage from the drip pad must be: A) constructed of materials that are: i) chemically resistant to the waste managed in the drip pad and the leakage that might be generated? Yes_____ No_____ N/A_____ ii) designed and operated to function without clogging through the scheduled closure of the drip pad? Yes_____ No_____ N/A_____ iii) of sufficient strength and thickness to prevent collapse under pressure exerted by overlaying materials and by any equipment used on the drip pad? Yes_____ No_____ N/A_____	725.543(b)
725.543(c)	Is the drip pad maintained such that it remains free of cracks, gaps, corrosion or other deterioration? Yes_____ No_____ N/A_____ **Note:** See Section 725.543(m) for remedial action required if deterioration or leakage is detected.	725.543(c)
725.543(d)	Is the drip pad and associated collection system designed and operated to convey, drain and collect liquid resulting from drippage or precipitation in order to prevent run-off? Yes_____ No_____ N/A_____	725.543(d)
725.543(e)	Unless protected by a structure, does the drip pad control run-on from a 24 hour, 25 year storm, unless the system has sufficient excess capacity to contain any run-on that might enter the system? Yes_____ No_____ N/A_____	725.543(e)
725.543(f)	Unless protected by a structure, does the drip pad have a run-off management system to collect and control at least the water volume resulting from a 24-hour, 25-year storm? Yes_____ No_____ N/A_____	725.543(f)
725.543(g)	Has the owner/operator obtained a statement from an IRPE certifying that the drip pad design meets the requirements of 725.543(a) through (g)? Yes_____ No_____ N/A_____	725.543(g)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.543(h)	Is drippage and accumulated precipitation removed from the associated collection system as necessary to prevent overflow onto the drip pad? Yes_____ No_____ N/A_____	725.543(h)
725.543(i)	Is the drip pad cleaned thoroughly at least once every seven days? Yes_____ No_____ N/A_____ - Is documentation being kept in an operating log of the date and time of each cleaning and the cleaning procedure used? Yes_____ No_____ N/A_____	725.543(i)
725.543(j)	Is the drip pad being operated and maintained in a manner to minimize tracking of hazardous waste or hazardous waste constituents off the drip pad as a result of activities by personnel or equipment? Yes_____ No_____ N/A_____	725.543(j)
725.543(k)	Is treated wood, after removal from the treatment vessel, held on the drip pad until drippage has ceased? Yes_____ No_____ N/A_____ - Is documentation being kept that all treated wood is held on the pad, in accordance with this Section, following treatment? Yes_____ No_____ N/A_____	725.543(k)
725.543(l)	Are collection and holding units associated with run-on and run-off control systems being emptied as soon as possible after storms? Yes_____ No_____ N/A_____	725.543(l)
725.543(m)	Has a release of hazardous waste occurred from the drip pad? Yes_____ No_____ N/A_____ 1) Upon detection of a release, has the owner/operator complied with the following: A) recorded the release in the facility's operating log? Yes_____ No_____ N/A_____ B) immediately removed from service the portion of the drip pad affected by the condition? Yes_____ No_____ N/A_____ C) determined what steps must be taken to repair the drip pad, clean up any leakage from below the drip pad, and establish a schedule for accomplishing the clean up and repairs? Yes_____ No_____ N/A_____ D) notified the Agency within 24 hours?; and Yes_____ No_____ N/A_____ provided written notice to the Agency including the information required in Section 725.543(m)(1)(D) above within 10 days? Yes_____ No_____ N/A_____ 3) Upon completion of all repairs and clean up, notified the Agency in writing and provided a certification signed by the IRPE? Yes_____ No_____ N/A_____	725.543(m)
725.543(n)	Is the owner/operator documenting, in the facility's operating log, past operating and waste handling practices? Yes_____ No_____ N/A_____ Do these records include the following: - identification of preservation formulations used in the past? Yes_____ No_____ N/A_____ - a description of drippage management practices? Yes_____ No_____ N/A_____ - a description of treated wood storage practices? Yes_____ No_____ N/A_____ - a description of treated wood handling practices? Yes_____ No_____ N/A_____	725.543(n)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	Section 725.544 Inspections	
725.544(a)	Have liners and cover systems (e.g., membranes, sheets or coatings) been inspected for uniformity, damage and imperfections (e.g., holes, cracks, thin spots or foreign materials) during construction or installation? Yes_____ No_____ N/A_____ - Have liners and cover systems been inspected and certified as meeting the requirements of 725.543 by an IRPE immediately after construction or installation? Yes_____ No_____ N/A_____ - Is this certification being maintained at the facility? Yes_____ No_____ N/A_____ - Have liners and covers been inspected to ensure tight seams and joints and the absence of tears, punctures or blisters after installation? Yes_____ No_____ N/A_____	725.544(a)
725.544(b)	While in operation, is the drip pad being inspected weekly and after storm events for: - deterioration, malfunctions or improper operation of run-on and run-off systems? Yes_____ No_____ N/A_____ - presence of leakage in and proper function of the leak detection system? Yes_____ No_____ N/A_____ - deterioration or cracking of the drip pad surface? Yes_____ No_____ N/A_____	725.544(b)
	Note: See Section 725.543(m) for remedial action required if deterioration or leakage is detected.	
	Section 725.545 Closure **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection.	
725.545	Has the drip pad unit been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____ Has the owner/operator of an existing drip pad unit without a liner prepared a contingent closure and post-closure plan? Yes_____ No_____ N/A_____	725.545
	SUBPART AA: AIR EMISSION STANDARDS FOR PROCESS VENTS	
	Section 725.930 Applicability	
725.930(b)	Has the owner/operator who has process vents identified in Section 725.930(b) above managed hazardous waste with organic concentrations of at least 10 ppmw (parts per million by weight) in: 1) units that are subject to the permitting requirements of Part 703; or 2) hazardous waste recycling units that are located in hazardous waste management facilities otherwise subject to the permitting requirements of Part 703? Yes_____ No_____ N/A_____	
	Note: The requirements of Section 725.932 through 725.936 apply to process vents on hazardous waste recycling units previously exempt under Section 721.106(c)(1). Other exemptions under Section 721.104, 722.134 and 725.101(c) are not affected by these requirements.	
	Section 725.932 Standards: Process Vents	
725.932(a)	Has the owner/operator who has process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managed those wastes by: 1) reducing total organic emissions at the facility below 1.4 Kg/h (3 lb/h) and 2.8 Mg/yr (3.1 tons/yr); or 2) reducing, by use of a control device, total organic emissions at the facility by 95 weight percent? Yes_____ No_____ N/A_____	725.932(a)
725.932(b)	If the owner/operator installs a closed-vent system and control device to comply with the provisions of subsection (a), have the requirements of Section 725.933 been met? Yes_____ No_____ N/A_____	725.932(b)
725.932(c)	If the owner/operator uses performance tests to determine vent emissions, emission reductions or total organic compound concentrations achieved by add-on control devices, have the requirements of Section 725.934(c) been met? Yes_____ No_____ N/A_____	725.932(c)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.932(d)	If an owner/operator and the Agency have disagreed on engineering calculations, have the procedures in Section 725.934(c) been used to resolve the disagreement? Yes_____ No_____ N/A_____	725.932(d)
	Section 725.933 Standards: Closed-Vent Systems and Control Devices	
725.933(a)	Has the owner/operator of closed-vent systems and control devices complied with the provisions of this Section? Yes_____ No_____ N/A_____	
	Has the owner/operator who was not able to comply with the provisions of this Subpart prepared an implementation schedule that may allow up to 30 months after the effective date that the facility becomes subject to this Subpart for installation and start-up and included dates by which the closed-vent system and control device will be installed and in operation? Yes_____ No_____ N/A_____	725.933(a)
725.933(b)	Has the owner/operator who uses a control device involving vapor recovery designed and operated to recover the organic vapors vented to it with the efficiency required in this subsection? Yes_____ No_____ N/A_____	725.933(b)
725.933(c)	Has the owner/operator who uses an enclosed combustion device (e.g. a vapor incinerator, boiler or process heater) designed and operated it with the requirements of this subsection? Yes_____ No_____ N/A_____	
	If an oiler or a process heater is used as the control device, has the vent stream been introduced into the flame zone of the boiler or process heater? Yes_____ No_____ N/A_____	725.933(c)
725.933(d)	Has the owner/operator designed and operated a flare so that: 1) there are not visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours?; and 2) a flame is present at all times; and 3) the heating value meets one of the values specified in this subsection and has been determined by the methods specified in subsection (e)(2)? Yes_____ No_____ N/A_____ 4) Has the steam-assisted or non-assisted flare been designed for and operated with an exit velocity as determined by the methods specified in subsections (e)(3) and (e)(4), and with the values specified in this subsection? Yes_____ No_____ N/A_____ 5) Has the air-assisted flare been designed and operated with an exit velocity less than the value determined by the method specified in subsection (e)(5)? Yes_____ No_____ N/A_____ 6) Is the flare used to comply with this Section steam-assisted, air-assisted or non-assisted? Yes_____ No_____ N/A_____	725.933(d)
725.933(e)	Did the owner/operator use the methods specified in this Subpart to determine the compliance of a flare with the visible emissions, heat value and velocities identified in this Subpart? Yes_____ No_____ N/A_____	725.933(e)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.933(f)	Has the owner/operator monitored and inspected each control device required to comply with this Section to ensure proper operation and maintenance of the control device by implementing the requirements specified in the following subsections: 1) for a flow indicator? Yes_____ No_____ N/A_____ 2) for a device to continuously monitor the control device operation: A) for a thermal vapor incinerator, a temperature monitoring device? Yes_____ No_____ N/A_____ B) for a catalytic vapor incinerator, a temperature monitoring device? Yes_____ No_____ N/A_____ C) for a flare, a heat sensing monitoring device? Yes_____ No_____ N/A_____ D) for a boiler or process heater with heat input capacity less than 44 MW, a temperature monitoring device? Yes_____ No_____ N/A_____ E) for a boiler or process heater with heat input capacity greater than or equal to 44 MW, a monitoring device equipped with a continuous recorder? Yes_____ No_____ N/A_____ F) for a condenser, either a monitoring device equipped with a continuous recorder or temperature monitoring device equipped with a continuous recorder? Yes_____ No_____ N/A_____ G) for a carbon adsorption system, a monitoring device equipped with a continuous recorder? Yes_____ No_____ N/A_____ 3) inspected the readings from each monitoring device required by subsections (f)(1) and (f)(2) at least once each operating day and, if necessary, implemented the corrective measures to ensure compliance with the requirements of this Section? Yes_____ No_____ N/A_____	725.933(f)
725.933(g)	If an owner/operator uses a carbon adsorption system as described in this subsection, has the predetermined time interval that is no longer than the carbon service life been established as the requirement of Section 725.935(b)(4)(C)(vi)? Yes_____ No_____ N/A_____	725.933(g)
725.933(h)	Has the owner/operator who uses a carbon adsorption system, as described in this subsection, used the procedures specified to replace the existing carbon with fresh carbon on a regular basis? Yes_____ No_____ N/A_____	725.933(h)
725.933(i)	Has the owner/operator who uses a control device other than those specified documented the control device operation and identified the process parameter(s) that indicate proper operation and maintenance of the control device? Yes_____ No_____ N/A_____	725.933(i)
725.933(j)	Has the owner/operator met the requirements of this subsection for closed-vent systems? Yes_____ No_____ N/A_____	725.933(j)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.933(k)	Has the owner/operator monitored and inspected each closed-vent system required to comply with this Section to ensure proper operation and maintenance of the closed-vent system by implementing the following requirements: 1) for a system used to comply with subsection (j)(1) of this Section: A) an initial leak detection prior to the date the system became subject to this Section using procedures specified in Section 725.934(b)? Yes_____ No_____ N/A_____ B) (i) after initial leak detection, inspect and monitor permanently or semi-permanently sealed joints or other seams or other connectors once per year for defects using procedures specified in Section 725.934(b)? Yes_____ No_____ N/A_____ (ii) for components or connection other than those specified in (k)(1)(B)(i) monitored annually or as required by Regional Administrator using procedures specified in Section 725.934(b)? Yes_____ No_____ N/A_____ C) repairs detected defects or leaks in accordance with subsection (k)(3) of this Section? Yes_____ No_____ N/A_____ D) maintain inspection and monitoring records in accordance with Section 725.935? Yes_____ No_____ N/A_____ 2) for a system used to comply with subsection (j)(2) of this Section: A) visually inspected for defects that could result in air pollutant emissions? Yes_____ No_____ N/A_____ B) performed on initial inspection of the system on or before the date the system became subject to this section with inspection at least once per year thereafter: Yes_____ No_____ N/A_____ C) repair detected defects or leaks in accordance with Subsection (k)(3) of this Section? Yes_____ No_____ N/A_____ D) maintain inspection and monitoring records in accordance with Section 725.935? Yes_____ No_____ N/A_____ 3) repaired all detected defects as follows: A) emissions detected by visual inspection or instrument reading greater than 500 ppmv above background where controlled as soon as practicable but not later than 15 calendar days after detection? Yes_____ No_____ N/A_____ B) a first attempt at repairs is made no later than five calendar days after detection? Yes_____ No_____ N/A_____ C) for repairs delayed as allowed in subsection (3)(C), were repairs completed by end of next process unit shutdown? Yes_____ No_____ N/A_____ D) maintained repair records in accordance with 725.935? Yes_____ No_____ N/A_____	725.933(k)
725.933(l)	Have the closed-vent systems and control devices been operated at all times when emissions may have been vented to them? Yes_____ No_____ N/A_____	725.933(l)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.933(m)	Has the owner/operator using a carbon absorption system to control air pollutant emissions documented that all hazardous waste carbon that is removed from the control device is managed in one of the following manners that meets the requirement of this subsection: 1) is regenerated or reactivated in a thermal treatment unit; 2) is incinerated in a hazardous waste incinerator; or 3) is burned in a boiler or industrial furnace? Yes_____ No_____ N/A_____	725.933(m)
725.933(n)	Has the owner/operator of a closed-vent system with components designated as unsafe to monitor met the exemption requirements of this subsection? Yes_____ No_____ N/A_____	725.933(n)
	Section 725.934 Test Methods and Procedures	
725.934	Has the owner/operator subject to the provisions of this Subpart complied with the test methods and procedure requirements provided in this Section? Yes_____ No_____ N/A_____	725.934
	Section 725.935 Recordkeeping Requirements	
725.935(a)	Has the owner/operator complied with the recordkeeping requirements of this Section? Yes_____ No_____ N/A_____	725.935(a)
725.935(b)	Has the following information been recorded in the facility's operating record: 1) for facilities that comply with Section 725.933(a)(2), an implementation schedule for the closed-vent system and control device that meets the requirements of this subsection? Yes_____ No_____ N/A_____ 2) documentation of compliance for the process vent standards in Section 725.932 that includes the requirements of this subsection? Yes_____ No_____ N/A_____ 3) a performance test plan to determine the organic removal efficiency or total organic compound concentration? Yes_____ No_____ N/A_____ If "Yes", does the plan include the following: A) a description of how the planned test is going to be conducted? Yes_____ No_____ N/A_____ B) an engineering description of the closed-vent system and control device, including the manufacturer's name and model number, type, dimensions, capacity and construction materials? Yes_____ No_____ N/A_____ C) a description of sampling and monitoring procedures including the requirements of this subsection? Yes_____ No_____ N/A_____	725.935(b)
	Comments:	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	4) documentation of compliance with Section 725.933? Yes_____ No_____ N/A_____ If yes, does the documentation include the following: A) a list of information references and services? Yes_____ No_____ N/A_____ B) records of the dates of each compliance test required by Section 725.933(j)? Yes_____ No_____ N/A_____ C) engineering calculations, if used, accompanied by basic control device design information and design analysis that address the vent stream characteristics and control device operation parameters as specified in this subsection? Yes_____ No_____ N/A_____ D) a statement signed and dated by the owner/operator certifying the operating parameters used in design analysis represents conditions that would exist when the unit is at highest load or capacity level? Yes_____ No_____ N/A_____ E) a statement signed and dated by the owner/operator certifying the control device meets the efficiency requirements of this subsection? Yes_____ No_____ N/A_____ **NOTE:** A statement provided by the control device manufacturers or vendor certifying that the control equipment meets the design specifications may be used to comply with this requirement. F) all test results if performance tests are used to demonstrate compliance? Yes_____ No_____ N/A_____	
725.935(c)	Has the following information been recorded in the facility's operating records: 1) description and date of each modification that is made to the closed vent system or control device design? Yes_____ No_____ N/A_____ 2) identification of operating parameters, descriptions of monitoring devices, and diagrams of monitoring sensor locations used to comply with Section 725.933(f)(1) and (2)? Yes_____ No_____ N/A_____ 3) monitoring, operating, and inspection information required by Section 725.933(f) through (k)? Yes_____ No_____ N/A_____ 4) date, time, and duration of each period the control device is operating while monitored parameters exceed values specified in this subsection? Yes_____ No_____ N/A_____ 5) an explanation for each period recorded under subsection (c)(4) of this Section? Yes_____ No_____ N/A_____ 6) for carbon adsorption systems subject to Section 725.933(g) or (h)(2), any date when the existing carbon is replaced with fresh carbon? Yes_____ No_____ N/A_____ 7) for carbon adsorption systems subject to Section 725.933(h)(1), a log that records date and time when the control device is monitored for carbon breakthrough, the monitoring device reading, and date when existing carbon is replaced with fresh carbon? Yes_____ No_____ N/A_____ 8) date of each control device startup and shutdown? Yes_____ No_____ N/A_____ 9) identification of closed-vent system components designated as unsafe to monitor, an explanation why the component is unsafe to monitor, and the plan for monitoring each closed-vent system component? Yes_____ No_____ N/A_____ 10) for each leak detected as specified in Section 725.933(k), the information specified in subsection (10)(A) through (E) of this Section? Yes_____ No_____ N/A_____	725.935(c)
725.935(d)	Has the owner/operator maintained records of the monitoring, operating, and inspection information required by subsections (c)(3) through (10) of this Section for at least three years following the date of each occurrence, measurement, corrective action, or record? Yes_____ No_____ N/A_____	725.935(d)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.935(e)	Has the owner/operator recorded in the facility operating record monitoring and inspection information indicating proper operation and maintenance of a control device other than a thermal vapor incinerator, catalytic vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system? Yes_____ No_____ N/A_____	725.935(e)
725.935(f)	Has the owner/operator recorded in the facility operating record the data used to determine if a process vent is subject to Sections 725.932 and 725.934(d)(2) when application of the knowledge of the nature of the hazardous waste stream, or the process by which it was produced, is used? Yes_____ No_____ N/A_____	725.935(f)
	SUBPART BB: AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS	
	Section 725.950 Applicability **Note:** If any equipment is in contact with hazardous waste, with an organic concentration of at least 10% by weight for a period of 300 hours per calendar year, it is subject to this Subpart. Equipment in contact with regulated waste less than 300 hours per calendar year is excluded from the requirements of this subpart, if it is identified as required in Section 725.964(g)(6).	
725.950(c)	Is equipment in contact with hazardous wastes with concentrations of at least 10% by weight marked to be readily distinguished from other equipment? Yes_____ No_____ N/A_____	725.950(c)
725.950(d)	Is equipment in vacuum service identified in the operating record? Yes_____ No_____ N/A_____	725.950(d)
	Note: If "No", Sections 725.952 - 725.960 apply to these units.	
	Section 725.952 Standards: Pumps in Light Liquid Service	
725.952(a)	Is each pump monitored monthly to detect leaks? Yes_____ No_____ N/A_____ 1) Are methods specified in 725.963(b) utilized? Yes_____ No_____ N/A_____ 2) Are the pumps visually inspected weekly? Yes_____ No_____ N/A_____	725.952(a)
725.952(c)	If a leak has been detected, has it been repaired as soon as practicable, or no later than 15 days after detection? Yes_____ No_____ N/A_____ Was a first attempt at repair made no later than 5 days after detection? Yes_____ No_____ N/A_____	725.952(c)
	Note: Pumps equipped with dual mechanical seals including a barrier fluid system are exempt from the inspection provisions if they meet the requirements of 725.292(d). **Note:** Pumps designated for no detectable emissions are exempt from the requirements of a., b., & c. if they meet the requirements of 725.952(e).	
	Section 725.953 Standards: Compressors	
725.953(a)	Is each compressor equipped with an adequate seal system that includes a barrier fluid system (BFS)? Yes_____ No_____ N/A_____	725.953(a)
725.953(b)	Is each compressor seal system: 1) operated with the barrier fluid at a pressure greater than the compressor stuffing box; or 2) equipped with a BFS connected to a closed vent system control device; or 3) purges the barrier fluid into the HW with no emissions? Yes_____ No_____ N/A_____	725.953(b)
725.953(c)	Does the seal use a barrier fluid that is not a hazardous waste? Yes_____ No_____ N/A_____	725.953(c)
725.953(d)	Does the BFS have a sensor that will detect failures: Yes_____ No_____ N/A_____	725.953(d)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.953(e)	1) Has each sensor been checked daily or equipped with an audible alarm that is checked monthly (or at unmanned areas, checked daily)? Yes_____ No_____ N/A_____ 2) Has the owner/operator determined criteria for what constitutes a failure of the seal system and/or the BFS? Yes_____ No_____ N/A_____	725.953(e)
725.953(g)	1) If a leak has been detected, has it been repaired not later than 15 days after detection? Yes_____ No_____ N/A_____ 2) Was a first attempt at repair made within 5 days? Yes_____ No_____ N/A_____ **Note:** A compressor designated for no emissions is exempt from a-h if the requirements of 725.953(i) are met.	725.953(g)
	Section 725.954 Standards: Pressure Relief Devices in Gas/Vapor Service	
725.954(a)	Except during pressure releases, is each device operated with no detectable emissions? Yes_____ No_____ N/A_____	725.954(a)
725.954(b)	1) Following a pressure release, was the device returned to no detectable emission condition within 5 days? Yes_____ No_____ N/A_____ 2) Was the device monitored to confirm this within 5 days by a method specified in 725.963? Yes_____ No_____ N/A_____ **Note:** Devices with a closed vent capture and return system are exempt from subsections (a) & (b).	725.954(b)
725.955(a)	Is each sampling connection system equipped with a closed purge or closed vent system? Yes_____ No_____ N/A_____	725.955(a)
725.955(b)	Each closed purge or closed vent system must: 1) return the purged waste directly to the process line with no detectable emissions; or 2) collect and recycle the purged waste with no detectable emissions; or 3) be designed and operated to capture and transport all purged wastes to a control device which meets 725.960? Yes_____ No_____ N/A_____ **Note:** In Situ sampling systems are exempt from 725.955 (a) & (b).	725.955(b)
	Section 725.956 Standards: Open-Ended Valves or Lines	
725.956(a)	1) Is each open-ended valve or line equipped with a cap, blind flange, plug or second valve? Yes_____ No_____ N/A_____ 2) Does the cap, blind flange, plug or second valve seal the open ended line or valve except during operations? Yes_____ No_____ N/A_____	725.956(a)
725.956(b)	Where a second valve is used, is the valve on the waste stream end closed first? Yes_____ No_____ N/A_____	725.956(b)
	Section 725.957 Standards: Valves in Gas/Vapor or Light Liquid Service	
725.957(a)	Are valves in this service monitored monthly? Yes_____ No_____ N/A_____ Is a method specified in 725.963 used for this monitoring? Yes_____ No_____ N/A_____	725.957(a)
725.957(c)	Are valves monitored the first month of every quarter if they have not leaked for 2 months, or monthly until a leak is not detected for 2 months? Yes_____ No_____ N/A_____	725.957(c)
725.957(d)	1) If a leak was detected, was the valve repaired in not more than 15 days? Yes_____ No_____ N/A_____ 2) Was a first attempt at repair made in not more than 5 days? Yes_____ No_____ N/A_____ **Note:** Valves designated as no detectable emissions, unsafe to monitor or difficult to monitor are exempt from subsection (a) if they meet the requirements of 725.957(f), (g) or (h).	725.957(d)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.958(a)	**Section 725.958 Standards: Pumps, Valves, Pressure Relief Devices, Flanges and Other Connectors** Are pumps and valves in heavy liquid service, pressure relief devices, flanges and connectors monitored within 5 days if a leak is suspected using visual, audible, olfactory or other detection method? Yes_____ No_____ N/A_____	725.958(a)
725.958(c)	1) If a leak was detected, were repairs made within 15 days? Yes_____ No_____ N/A_____ 2) Was a first attempt at repair made in not more than 5 days? Yes_____ No_____ N/A_____ Note: Any connector that is inaccessible or is ceramic-lined is exempt from the monitoring requirements of this Part and the recordkeeping requirements of Section 725.964.	725.958(c)
725.959	**Section 725.959 Standards: Delay of Repair** Do any delays in repair to leaking equipment meet the exclusions outlined in this section? Yes_____ No_____ N/A_____	725.959
725.960	**Section 725.960 Standards: Closed-Vent Systems and Control Devices** Has the owner/operator of a closed vent system or control device complied with the provisions of 725.933? Yes_____ No_____ N/A_____	725.960
725.961	**Section 725.961 Percent Leakage Alternative for Valves** For all valves within a HWMU, if the 2% leakage alternative is chosen, is the owner/operator complying with the requirements of this Section? Yes_____ No_____ N/A_____	725.961
725.962	**Section 725.962 Skip Period Alternative for Valves** For all valves in a HWMU, if reduced monitoring options are chosen, is the owner/operator meeting the requirements of this Section? Yes_____ No_____ N/A_____	725.962
725.963	**Section 725.963 Test Methods and Procedures** Are the appropriate test methods and procedures followed for: b) leak detection monitoring? Yes_____ No_____ N/A_____ c) no detectable emissions demonstrations? Yes_____ No_____ N/A_____ d) hazardous waste organic concentrations? Yes_____ No_____ N/A_____ e) revisions to the determinations that equipment contains hazardous waste? Yes_____ No_____ N/A_____	725.963
725.964(b)	**Section 725.964 Recordkeeping Requirements** Is the following information being maintained in the operating record: 1) for each piece of applicable equipment: A) the equipment ID number and the HWMU identification; B) approximate locations within the facility; C) the type of equipment (e.g. a pump or valve); D) percent by weight total organics in the hazardous wastestream at the equipment; E) state of the hazardous waste at the equipment; F) method of compliance with the standard? Yes_____ No_____ N/A_____ 2) for facilities that comply with 725.933(a)(2), the specified implementation schedule? Yes_____ No_____ N/A_____ 3) the performance test plan specified in 725.935(b)(3) where test data is used for control devices? Yes_____ No_____ N/A_____	725.964(b)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.964(c)	When a leak is detected, have the following requirements been met: 1) a weatherproof and readily visible identification attached to the leaking equipment showing: - the equipment ID number; and - the date evidence of a potential leak was found: and - the date the leak was detected? Yes_____ No_____ N/A_____	
	2) Was the identification removed only after the equipment was repaired? Yes_____ No_____ N/A_____	725.964(c)
	3) In the case of the valve, has the identification been removed after monitoring shows no leak detected for 2 months? Yes_____ No_____ N/A_____	
725.964(d)	When a leak was detected, was the following information recorded in an inspection log and kept in the facility operating record: 1) the instrument and operator ID number and the equipment ID number; and 2) the date evidence of a potential leak was found; and 3) the date a leak was detected, and the dates of all repair attempts; and 4) repair methods applied; and 5) "above 10,000" if the instrument readings after each repair attempt where the readings were at or above 10,000 ppm; and 6) "Repair Delayed" and the reason, if repairs could not be made within 15 days; and 7) documentation supporting valve repair delays; and 8) the signature authorizing the determination that repairs could not be made without unit shutdown; and 9) the expected date of repair; and 10) the actual date of successful repair? Yes_____ No_____ N/A_____	725.964(d)
725.964(e)	Is documentation on closed vent systems and control devices being maintained in the operating record? Yes_____ No_____ N/A_____	725.964(e)
725.964(f)	Is monitoring and inspection information on control devices maintained in the operating record? Yes_____ No_____ N/A_____	725.964(f)
725.964(g)	Is a log maintained for equipment subject to 725.952 through 725.960 showing: 1) a list of the ID numbers of equipment subject to these standards; and 2) a list of ID numbers for equipment designated as no detectable emissions, with a description signed by the operator; and 3) a list of equipment ID numbers for pressure relief devices; and 4) compliance test; and 5) a list of ID numbers of equipment in vacuum service; and 6) identification, either by list or location of equipment that contains or contacts hazardous waste with an organic concentration of at least 10% by weight for a period of less than 300 hours per year? Yes_____ No_____ N/A_____	725.964(g)
725.964(h)	Is a log kept in the facility operating record for all valves subject to 725.957(g) showing: 1) a list of ID numbers of all valves determined as unsafe to monitor, an explanation why and a monitoring plan; and 2) a list of ID numbers of equipment designated as difficult to monitor, an explanation and a monitoring plan; and monitoring schedule? Yes_____ No_____ N/A_____	725.964(h)
725.964(i)	Does the record for valves subject to 725.962 include: 1) a schedule of montoring; and 2) the percent of valves found leaking during each monitoring period? Yes_____ No_____ N/A_____	725.964(i)
725.964(j)	1) Is a log kept showing the criteria required in 725.952(d)(5)(B) and 725.953(e)(2) with an explanation of the design critiera? Yes_____ No_____ N/A_____	
	2) Does the log show changes in the criteria and an explanation for the changes? Yes_____ No_____ N/A_____	725.964(j)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.964(k)	Is a log kept on determining exemptions as specified in this Subpart? Yes_____ No_____ N/A_____	725.964(k)
725.964(l)	Is the operating and leak information being maintained for 3 years? Yes_____ No_____ N/A_____	725.964(l)
725.964(m)	Is the documentation for alternative compliance kept in accordance with this Subpart? Yes_____ No_____ N/A_____ COMMENTS:	725.964(m)

SUBPART CC: AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS

Section 725.980 Applicability

725.980

Note: This Subpart only applies to owners and operators that treat, store or dispose hazardous waste in tanks, surface impoundments, or containers subject to Subpart I, J, or K of Part 725, except as Section 725.101 and subsection 725.980(b) provide otherwise, that have an average volatile organic concentration of 500 ppmw or greater.

Note: Do any of the following general exclusions, referenced in Section 725.980(a), apply for the above regulated tanks, surface impoundments, and/or containers?

1. Wastewater treatment unit (725.101(c)(10))
2. Emergency spill management unit (725.101(c)(11))
1. Hazardous waste recycling unit (725.101(c)(6))
2. Elementary neutralization unit (725.101(c)(10))
3. Totally enclosed treatment unit (725.101(c)(9))
4. Satellite accumulation area (725.101(c)(7) & 722.134(c)(1))

Note: Do any of the following specific exclusions listed in Section 725.980(b) apply for the above regulated tanks, surface impoundments, and/or containers?

1. Waste was placed in the unit prior to Oct. 6, 1996 and none has been added since. (725.980(b)(1))
2. The **container** has a design capacity less than or equal to 0.1m^3 (3.5ft^3 or 26.4 gal). (725.980(b)(2))
3. The **tank or surface impoundment** has stopped receiving waste and is undergoing closure pursuant to an approved closure plan. (725.980(b)(3) & 725.980(b)(4))
4. The unit is used solely for on-site treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program. (725.980(b)(5))
5. The unit is used solely to manage radioactive mixed waste. (725.980(b)(6))
6. The unit operates with an emission control device regulated by and in accordance with Clean Air Act regulations. (725.980(b)(7))
7. The unit operates with a process vent as defined in 725.931, regulated under Subpart AA. (725.980(b)(8))

Note: If a **tank or container** is used for the management of hazardous waste generated by organic peroxide manufacturing and its associated lab operations, see Section 725.980(d).

Section 725.982 Schedule for Implementation of Air Emission Standards

725.982(a)(1)	Has the owner or operator of a facility in existence on December 6, 1996, and subject to Subpart I, J, or K of this Part, installed and begun operating all control equipment for waste management units to comply with Subpart CC, or completed modifications of production or treatment processes to satisfy exemption criteria of Section 725.983(c) by December 8, 1997? Yes_____ No_____ N/A_____	725.982(a)(1)
725.982(b)(1)	Has the owner or operator of a facility or unit in existence **on the effective date of the statutory or regulatory amendments** that render the facility subject to Subpart I, J, or K installed and begun operating all control equipment for waste management units to comply with Subpart CC, or completed modifications of production or	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	treatment processes to satisfy exemption criteria of Section 725.983(c) by either the effective date of the amendment, or no later than 30 months after the effective date of the amendment and maintained an implementation schedule pursuant to Section 725.982(b)(2)(B)? Yes_____ No_____ N/A_____	725.982(b)(1)
725.982(c)	Has the owner or operator of a facility or unit that becomes newly subject to the requirements of Subpart CC after December 8, 1997 due to an action other than those described in subsection 725.982(b) immediately complied with all applicable requirements (i.e. control devices)? Yes_____ No_____ N/A_____	725.982(c)
	Section 725.983 Standards: General	
725.983(b)	Has the owner or operator controlled air pollutant emissions from each hazardous waste management unit in accordance with the standards in Sections 725.985 through 725.988, except as provided for in subsection 725.983(c) (less than 500 ppmw VO concentration)? Yes_____ No_____ N/A_____	725.983(b)
	Section 725.984 Waste Determination Procedures	
725.984(a)(1)	Has the owner or operator determined the average VO concentration at the point of waste origination for each hazardous waste placed in a waste management unit exempted under Section 725.983(c)(1) (VO concentration less than 500 ppmw)? Yes_____ No_____ N/A_____	725.984(a)(1)
725.984(a)(2)	Has the owner or operator determined the average VO concentration of a hazardous waste at the point of waste origination, as required by subsection 725.984(a)(1), using either: A) direct measurement (725.984(a)(3)) or Yes_____ No_____ N/A_____ B) knowledge of the waste (725.984(a)(4))? Yes_____ No_____ N/A_____ **Note:** Documentation is required for either method of determination.	725.984(a)(2)
725.984(b)(1)	Has the owner or operator performed the applicable waste determination for each treated hazardous waste placed in a waste management unit exempted under Sections 725.983(c)(2)(A) through 725.983(c)(2)(F) from using air emission controls? Yes_____ No_____ N/A_____	725.984(b)(1)
725.984(b)(2)	Has the owner or operator designated and recorded the specific provision in Section 725.983(c)(2) under which the waste determination for each treated hazardous waste is being performed? Yes_____ No_____ N/A_____	
	Has the waste determination for the treated hazardous waste been performed using the applicable procedures specified in subsections 725.984(b)(3) through 725.984(b)(9)? Yes_____ No_____ N/A_____	725.984(b)(2)
725.984(c)(1)	Has the owner or operator determined the maximum organic vapor pressure for each hazardous waste placed in a **tank** using Tank Level 1 controls in accordance with Section 725.985(c)? Yes_____ No_____ N/A_____	725.984(c)(1)
725.984(c)(2)	Has the owner or operator used either: A) direct measurement (725.984(c)(3)) or Yes_____ No_____ N/A_____ B) knowledge of the waste (725.984(c)(4)) Yes_____ No_____ N/A_____ to determine the maximum organic vapor pressure that is representative of the hazardous waste composition stored or treated in the **tank**? **Note:** Documentation is required for either method of determination.	725.984(c)(2)
725.984(d)	Has the owner or operator followed the procedure for determining no detectable organic emissions, specified in subsections 725.984(d)(1) through 725.984(d)(9), for the purpose of complying with Subpart CC? Yes_____ No_____ N/A_____	725.984(d)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.985(b)	**Section 725.985 Standards: Tanks** Has the owner or operator controlled air pollutant emissions from each tank subject to this Section: Yes _____ No _____ **Note:** If no, identify the tank number and specific violation on the Tank Disposition Form.	725.985(b)
	Note: The owner or operator may control such air pollutant emissions by applying Tank Level 1 controls or Tank Level 2 controls. Tank Level 1 or Tank Level 2 controls may only be applied to tanks that meet certain conditions related to design capacity and Maximum Organic Vapor Pressure (MOVP). The owner or operator may use direct measurement or knowledge of the waste to determine the MOVP as explained in Section 725.984(c). The MOVP, by design capacity, are as follows: **Volume** — **MOVP** >39,887 ga — 0.75 psia >19,810 but <39,887 gal — 4.0 psia >19,810 gal — 11.1 psia **Note:** In order to use Tank Level 1 controls, a tank must be equipped with a fixed roof design. See subsection 725.985(c)(2) below for additional requirements. In addition, the hazardous waste in the tank cannot be heated to a temperature above that at which the MOVP of the waste was determined and the hazardous waste cannot be treated in the tank using any waste stabilization process as defined in Section 725.981. Tanks used to manage hazardous waste that do not meet **ALL** of the conditions described in subsection 725.985(b)(1) must use ~~Tank Level 2 controls to control air pollutant emissions.~~	
725.985(c)(1)	Has the owner or operator determined the MOVP using the procedures specified in Section 725.984(c) for each hazardous waste prior to placing it in a tank using Tank Level 1 controls? Yes _____ No _____ N/A _____	
	Has a new determination been made whenever changes to the hazardous waste managed in the tank could potentially cause the MOVP to increase to a level equal to or greater than the MOVP limit for the tank design capacity applicable to it? Yes _____ No _____ N/A _____	725.985(c)(1)
725.985(c)(2)	Has a fixed roof tank with Tank Level 1 controls been designed and equipped: A) with a roof and its closure devices that form a continuous barrier over the entire surface area of the hazardous waste in the tank? (This roof may be a separate cover or may be an integral part of the tank structural design (e.g., a hatch on a horizontal cylindrical tank).) Yes _____ No _____ N/A _____ B) in a manner so there are no visible cracks, holes, gaps or other open spaces between roof sections or roof edge and the tank wall? Yes _____ No _____ N/A _____	
	C) with each opening in the fixed roof and any manifold system associated with the fixed roof: i) equipped with a closure device that when closed does not have visible cracks, holes, gaps or other open spaces between the perimeter of the opening and the closure device; or ii) connected by a closed-vent system to a control device that removes or destroys organics in the vent stream and is operating whenever hazardous waste is managed in the tank? Yes _____ No _____ N/A _____ N/I: _____	725.985(c)(2)
	Note: There is an exception to (c)(ii) (725.985(c)(2)(E)) that allows for the control device not to remove or destroy organics in the vent stream when the fixed roof is opened or removed or closure devices are opened for routine inspection, maintenance or other activities required for normal operations of the tank. Once these activities are completed, the roof or closure device must be secured and the control device must be returned to service.	
	D) with the fixed roof and its closure devices made of materials that will minimize exposure of the hazardous waste in the tank to the atmosphere and maintain the integrity of the roof and closure devices throughout their intended service life? Yes _____ No _____ N/A _____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.985(c)(3)	Whenever hazardous waste is in the tank, is the fixed roof installed with each closure device secured in the closed position? Yes _____ No _____ N/A _____	
	Note: Exceptions to this requirement are allowed to provide access to the tank for performing routine inspections and maintenance, or other activities needed for normal operations including the removal of sludge or other residues from the bottom of the tank. In addition, the opening of pressure relief devices that vent to atmosphere is allowed during normal operations for the purpose of maintaining tank internal pressure within the tank's design specifications. Finally, the opening of safety devices which function exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere during unsafe conditions resulting from an unplanned accidental or emergency event is allowed.	725.985(c)(3)
725.985(c)(4)	Is the owner or operator inspecting the air emission control equipment in accordance with the following requirements? A) Is the fixed roof and its control devices visually inspected to check for defects? Yes _____ No _____ B) Has the owner or operator performed an initial inspection of the fixed roof and its closure devices on or before the date that the tank became subject to this Part and at least once every year following that date? Yes _____ No _____ N/A _____	
	Note: Longer than one year intervals are allowed under special conditions. See Section 725.985(l).	725.985(c)(4)
	C) Have any defects detected during these inspections been repaired starting no later than five calendar days after detection, with the repair completed as soon as possible but no later than 45 calendar days from detection? Yes _____ No _____ N/A _____	
	Note: A repair time of longer than 45 calendar days is allowed if the owner or operator determines that repair requires emptying or the temporary removal from service of the tank and no alternative tank capacity is available. In this case the owner or operator shall repair the tank the next time it ceases operation. It may not be returned to service until repairs are completed.	
	D) Are records of the inspections maintained that include: i) a tank identification number (or other unique identification description selected by the owner or operator)?; ii) the date of the inspection? and iii) for each defect observed, its location, description and date of corrective action? (If the date of corrective action is delayed past 45 calendar days, the reason for the delay must be included.) Yes _____ No _____	
725.985(d)	Is the owner or operator controlling air pollutant emissions from a tank with Tank Level 2 controls using one of the following tanks: A) A fixed-roof tank equipped with an internal floating roof in accordance with the requirements specified in Section 725.985(e): Yes _____ No _____ N/A _____	
	B) A tank equipped with an external floating roof in accordance with the requirements of Section 725.985(f): Yes _____ No _____ N/A _____	725.985(d)
	C) A tank vented through a closed-vent system to a control device in accordance with the requirements in Section 725.985(g): Yes _____ No _____ N/A _____	
	D) A pressure tank designed and operated in accordance with the requirements in Section 725.985(h); or Yes _____ No _____ N/A _____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	E) A tank located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device in accordance with the requirements in Section 725.985(i). Yes _____ No _____ N/A _____ **Note:** Each of these Tank Level 2 controls is described in a subsequent Section of 725.985, as indicated above. Each of these subsections contains requirements regarding the equipment's design, construction, operation inspection and record keeping. As it is unlikely that many, if any, of these types of controls will be encountered during most normal inspections, no specific requirements have been included in this checklist. The inspector is referred to the regulations themselves. A space has been provided for recording the compliance status of any such control systems if they are encountered. A violation of any of the requirements in Sections 725.985(e) through (i) is also a violation of Section 725.983(b), 725.985(d), and 725.985(b).	
725.985(j)	Is the owner or operator who is transferring waste to a tank, doing so using: 1) Continuous hard piping, or Yes _____ No _____ N/A _____ Another closed system that does not allow exposure of the hazardous waste to the atmosphere. (An individual drain system, which meets the requirements of 40 CFR 63 Subpart RR is considered to be a closed system.) Yes _____ No _____ N/A _____	725.985(j)
	Note: The requirements of this subsection do not apply when transferring a hazardous waste to a tank under any of the following conditions: A) The hazardous waste meets the average VO concentrations of less than 500 ppmw as determined by procedures specified in 725.984(a) at the point of waste origin, or B) The hazardous waste has been treated by an organic destruction or removal process that meets the requirements of 725.983(c)(2), or C) The hazardous waste meets the (1) Numerical concentration limits for organic hazardous constituents, applicable to the hazardous waste, found in 728.Table T, or 2) The organic hazardous constituents in the waste have been treated by a technology for the waste as set forth in 728.142(a), or 3) An equivalent method of treatment approved by the Agency pursuant to 728.142(b)).	
725.985(k)	1) Has the owner or operator repaired each defect detected during inspections performed in accordance with the requirements of 725.985(e)(3), (f)(3), or (g)(3) as follows: First efforts at repair are made no later than five calendar days after detection and completed as soon as possible but no later than 45 calendar days after detection? Yes _____ No _____ N/A _____ **Note:** See also 725.985(c)(4) above for Tank Level 1 controls for fixed roof tanks. 2) A repair time of longer than 45 calendar days is allowed if the owner or operator determines that the repair requires emptying or the temporary removal from service of the tank and no alternative tank capacity is available. In this case, has the owner or operator repaired the defect the next time it ceased operation? (It may not be returned to service until repairs are completed.) Yes _____ No _____ N/A _____ **Note:** Subsequent inspection and monitoring may be performed at intervals longer than one year under special conditions identified in subsection 725.985.(l). **Comments:**	725.985(k)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	Section 725.986 Surface Impoundments The provisions of this Section apply to the control of air pollution emissions from surface impoundments for which Section 725.983(b) of this Subpart references the use of this Section for such air emission control.	
725.986(b)	Has the owner or operator who has a surface impoundment controlled air pollutant emissions by installing or operating either of the following: 1. A floating membrane cover in accordance with subsection 725.986(c) or Yes_____ No_____ N/A_____ 2. A cover that is vented through a closed vent system to a control device in accordance with subsection 725.986(d) Yes_____ No_____ N/A_____	725.986(b)
725.986(c)(1)	Is the surface impoundment equipped with a floating membrane cover designed to meet the specifications of 725.986(c)(1)(A) through 725.986(c)(1)(F)? Yes_____ No_____ N/A_____	725.986(c)(1)
725.986(c)(2)	When Hazardous waste is on the surface impoundment is the floating membrane cover floating on the liquid and is each closure device secured in the closed position? Yes_____ No_____ N/A_____ **Note:** Opening is allowed pursuant to subsection 725.986(c)(2)(A)(i)&(ii) and 725.986(c)(2)(B).	725.986(c)(2)
725.986(c)(3)	Is the owner or operator inspecting the floating membrane cover in accordance with the following procedures: 1) Is the floating membrane cover and its closure devices visually inspected to check for defects that could result in air pollution? Yes_____ No_____ N/A_____ 2) Was an initial inspection of the floating membrane cover and its closure devices performed on or before the surface impoundment became subject to this Section? Yes_____ No_____ N/A_____ After the initial inspection, has an inspection been performed at least annually? Yes_____ No_____ N/A_____ 3) Have repairs been completed in accordance with 725.986(f)? Yes_____ No_____ N/A_____ 4) Is the owner or operator maintaining inspection records in accordance with the requirements of subsection 725.990(c)? Yes_____ No_____ N/A_____	725.986(c)(3)
725.986(d)	Has the owner or operator that controls air pollutant emissions from a surface impoundment using a cover vented to a control device met the requirements of subsections 725.986(d)(1) through 725.986(d)(3)? Yes_____ No_____ N/A_____	725.986(d)
725.986(e)	Has the owner or operator transferred hazardous waste to a surface impoundment only in accordance with the requirements of subsections 725.986(e)(1) and 725.986(e)(2)? Yes_____ No_____ N/A_____	725.986(e)
725.986(f)	Has the owner or operator repaired each defect in accordance with subsection 725.986(c)(3) or 725.986(d)(3) as follows: 1) First effort at repair of the defect was made no later than five calendar days after detection, with repair completed as soon as possible, but no later than 45 calendar days after detection except as provided in 725.986(f)(2). Yes_____ No_____ N/A_____ 2) Repair may be delayed beyond 45 calendar days if repair of the defect requires emptying impoundment with no alternative capacity at the site. The defect must be repaired the next time the generation of that hazardous waste is stopped. Repair must be completed before generation of that waste unit resumes. Yes_____ No_____ N/A_____	725.986(f)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.986(g)	**Note:** Following the initial inspection and monitoring of the cover as required by the applicable provisions of this Subpart, subsequent inspection and monitoring may be performed at intervals longer than one year in the case when inspecting or monitoring the cover would expose a worker to dangerous, hazardous, or other unsafe conditions. In this case, has the owner or operator designated the cover as "unsafe to inspect and monitor" and complied with the following requirements?	
	1. Prepared a written explanation for the cover stating the reasons why the cover was unsafe to visually inspect or to monitor, if required? Yes_____ No_____ N/A_____	725.986(g)
	2. Developed and implemented a written plan and schedule to inspect and monitor the cover using the procedures specified in the applicable sections of the Subpart as frequently as practicable during those times when a worker can safely access the cover. Yes_____ No_____ N/A_____	
	Note: The provisions of this Section apply to the control of air pollution emissions from containers for which Section 725.983(b) references the use of this Section for such air emissions control.	
	Section 725.987 Standards: Containers	
725.987(b)(1)	Has the owner or operator who controls air pollutant emissions from containers subject to this Section complied with the following requirements: A) For a container having a design capacity greater than 26 gallons and less than or equal to 120 gallons, are emissions controlled in accordance with Container Level 1 standards specified in subsection 725.987(c)? Yes ✓ No_____ N/A_____	
	B) For a container having a design capacity greater than 120 gallons that is not in light material service, are emissions controlled in accordance with Container Level 1 standards specified in subsection 725.987(c)? Yes_____ No_____ N/A ✓	725.987(b)(1)
	C) For a container having a design capacity greater than 120 gallons that is in light material service, are emissions controlled in accordance with Container Level 2 standards specified in subsection 725.987(d)? Yes_____ No_____ N/A ✓	
725.987(b)(2)	When a container having a design capacity greater than 26 gallons is used for treatment by stabilization, are the emissions being controlled by Container Level 3 standards specified in subsection 725.987(e)? Yes_____ No_____ N/A ✓	725.987(b)(2)
725.987(c)(1)	Containers using Container Level 1 controls must be one of the following: A) a container that meets applicable U.S. Department of Transportation (DOT) regulations as specified in subsection 725.987(f). Yes ✓ No_____ N/A_____	
	B) a container equipped with a cover and closure devices so there are no visible holes, gaps, or other open spaces into the interior. Yes ✓ No_____ N/A_____	725.987(c)(1)
	C) an open-top container in which an organic-vapor suppressing barrier is placed such that no hazardous waste is exposed to the atmosphere? Yes ✓ No_____ N/A_____	
725.987(c)(2)	Are containers that are used to meet requirements of subsection 725.987(c)(1)(B) or subsection 725.987 (c)(1)(C) equipped with covers and closure devices composed of suitable materials to minimize exposure of the hazardous waste to the atmosphere and maintain the equipment integrity while it is in service? Yes ✓ No_____ N/A_____	725.987(c)(2)
725.987(c)(3)	Whenever a hazardous waste is in a container using Container Level 1 controls, has the owner or operator maintained each cover and closure device in the closed position? Yes ✓ No_____ N/A_____	725.987(c)(3)
	Note: Opening is allowed as specified in subsections 725.987(c)(3)(A)-(E)	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.987(c)(4)	Has the owner or operator of containers using Container Level 1 controls visually inspected and repaired as necessary the containers, covers, and closure devices as follows: A) within 24 hours after a container holding hazardous waste is accepted at a facility? Yes_____ No_____ N/A_____ B) a container used for managing hazardous waste remaining at the facility for a period of one year or more inspected initially and at least every 12 months. Yes_____ No_____ N/A_____ C) Is the first effort at repair made within 24 hours after detection? Yes_____ No_____ N/A_____ Are repairs completed within 5 calendar days after detection or is the waste removed from the container until the container is repaired? Yes_____ No_____ N/A_____	725.987(c)(4)
725.987(c)(5)	Has a copy of the procedure used to determine that containers with a capacity of 120 gallons or greater, that do not meet subsection 725.987(f), are not managing hazardous waste in light material service been maintained at the facility? Yes_____ No_____ N/A_____	725.987(c)(5)
725.987(d)(1)	Are all containers using Container Level 2 controls meeting one of the following: A) applicable U.S. Department of Transportation (DOT) regulations as specified in subsection 725.987(f)? Yes_____ No_____ N/A_____ B) operated with no detectable organic emissions in accordance with subsection 725.981 and subsection 725.987(g)? Yes_____ No_____ N/A_____ C) demonstrated within the preceding 12 months to be vapor-tight using Method 27 in accordance with Subsection 725.987(h)? Yes_____ No_____ N/A_____	725.987(d)(1)
725.987(d)(2)	Has the transfer of hazardous waste in or out of a container using Container Level 2 controls been conducted in a manner that minimizes exposure of the hazardous waste to the atmosphere? Yes_____ No_____ N/A_____	725.987(d)(2)
725.987(d)(3)	Whenever a hazardous waste is in a container using Container Level 2 controls, has the owner or operator maintained each cover and closure devices in the closed position? Yes_____ No_____ N/A_____ **Note:** Opening is allowed as specified in subsections 725.987(d)(3)(A)-(E)	725.987(d)(3)
725.987(d)(4)	Has the owner or operator of containers using Container Level 2 controls inspected and repaired, as necessary, the containers, covers and closure devices as follows: A) within 24 hours after a container holding hazardous waste is accepted at a facility? Yes_____ No_____ N/A_____ B) a container used for managing hazardous waste remains at the facility for a period of one year or more, inspected initially and at least every 12 months. Yes_____ No_____ N/A_____ C) Is the first effort at repair made within 24 hours after detection? Yes_____ No_____ N/A_____ Are repairs completed with 5 calendar days after detection or is the waste removed from the container until the container is repaired? Yes_____ No_____ N/A_____	725.987(d)(4)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.987(e)(1)	Are all containers using Container Level 3 controls meeting one of the following: A) vented directly through a closed-vent system to a control device in accordance with Subsection 725.987(e)(2)(B)? Yes_____ No_____ N/A_____ B) vented in an enclosure which is exhausted through a closed-vent system to a control device in accordance with Subsection 725.987(e)(2)(A) and 725.987(e)(2)(B)? Yes_____ No_____ N/A_____	725.987(e)(1)
725.987(e)(2)	Is the owner or operator meeting the following requirements: A) The container enclosure is designed and operated in accordance with criteria for a permanent total enclosure as specified in "Procedure T-Criteria for and Verification of a permanent or Temporary Total Enclosure" under 40 CFR 52.741. Yes_____ No_____ N/A_____ B) The closed-vent system and control device is designed and operated in accordance with Section 725.988. Yes_____ No_____ N/A_____	725.987(e)(2)
725.987(e)(6)	Is the transfer of hazardous waste into or out of a container using container Level 3 controls conducted in such a manner as to minimize exposure of the hazardous waste to the atmosphere, to the extent practical considering the physical properties of the hazardous waste and good engineering and safety practices. Yes_____ No_____ N/A_____	725.987(e)6)
725.987(f)	For the purpose of compliance with Subsection 725.987(c)(1)(A) or 725.987(d)(1)(A) do the containers meet applicable U.S. Department of Transportation (US DOT) regulations on packaging hazardous materials for transportation? Yes_____ No_____ N/A_____	725.987(f)
725.987(g)	Is the procedure specified in Subsection 725.984(d) being used to determine compliance with the no detectable organic emissions requirements of subsection 725.987(d)(1)(B). Yes_____ No_____ N/A_____	725.987(g)
725.987(h)	Is the procedure for determining a container to be vapor-tight using Method 27 of 40 CFR 60, Appendix A, for the purpose of complying with Subsection 725.987(d)(1)(C) being performed in accordance with 725.987(h). Yes_____ No_____ N/A_____ **Note:** Method 27 is generally used for delivery tank trucks.	725.987(h)
725.988	**Section 725.988 Standards for Closed-Vent Systems and Control Devices** **Note:** The provisions of this Section apply to each closed-vent system and control device installed and operated by the owner or operator to control air emissions in accordance with standards of this Subpart. Does the closed-vent system meet the following requirements:	
725.988(b)(1)	Are the gases, vapors, and fumes emitted from the hazardous waste in the waste management unit routed to a control device that meets the requirements specified in subsection 725.988(c)? Yes_____ No_____ N/A_____	725.988(b)(1)
725.988(b)(2)	Is the closed-vent system designed and operated in accordance with the requirements specified in Section 725.933(j)? Yes_____ No_____ N/A_____	725.988(b)(2)
725.988(b)(3)	When the closed-vent system includes bypass devices that could be used to divert the gas or vapor stream to the atmosphere before entering the control device, is each bypass device equipped with either a flow indicator as specified in subsection 725.988(b)(3)(A) of this section or a seal or locking device as specified in subsection 725.988(b)(3)(B)? Yes_____ No_____ N/A_____ **Note:** For the purpose of complying with this section, the following are not considered to be bypass devices: low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, spring-loaded pressure relief valves, and other fittings used for safety purposes.	725.988(b)(3)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.988(b)(4)	Does the owner or operator inspect and monitor the closed-vent system in accordance with the procedures specified in section 725.933(k)? Yes_____ No_____ N/A_____	725.988(b)(4)
725.988(c)(1)	The control device must be one of the following:	725.988(c)(1)
	A) A control device designed and operated to reduce the total organic content of the inlet vapor stream vented to the control device by at least 95% by weight. Yes_____ No_____ N/A_____	
	B) An enclosed combustion device designed and operated in accordance with the requirements of Section 725.933(c). Yes_____ No_____ N/A_____	
	C) A flare designed and operated in accordance with the requirements of Section 725.933(d). Yes_____ No_____ N/A_____	
725.988(c)(2)	Has the owner or operator that elects to use a closed-vent system and control device to comply with the requirements of this Section complied with the requirements specified in subsections 725.988(c)(2)(A) through 725.988(c)(2)(F)? Yes_____ No_____ N/A_____	725.988(c)(2)
725.988(c)(2)(A)	A) Have periods of planned routine maintenance (of the control device) not exceeded 240 hours per year? Yes_____ No_____ N/A_____	
	Note: The specifications and requirements in subsections 725.988(c)(1)(A), (c)(1)(B), and (c)(1)(C) for control devices do not apply during periods of planned routine maintenance or a control system malfunction.	725.988(c)(2)(A)
725.988(c)(2)(D)	D) Does the owner or operator keep a written record of the information specified in subsection 725.990(e)(1)(E) (i.e., periods of noncompliance with subsections 725.988(c)(1)(A), (c)(1)(B), or (c)(1)(C)) due to periods of planned routine maintenance or a control system malfuncation? Yes_____ No_____ N/A_____	725.988(c)(2)(D)
725.988(c)(2)(E)	E) Has the owner or operator corrected control device system malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of air pollutants? Yes_____ No_____ N/A_____	725.988(c)(2)(E)
725.988(c)(2)(F)	F) Does the owner or operator operate the closed-vent system so that gases, vapors, or fumes are not actively vented to the control device during periods of planned maintenance or control device system malfunction (i.e., periods when the control device is not operating or not operating normally), except in cases when it is necessary to vent the gases, vapors, or fumes to avoid an unsafe condition or to implement malfunction corrective actions or planned maintenance actions. Yes_____ No_____ N/A_____	725.988(c)(2)(F)
725.988(c)(3)	If the owner or operator using a carbon adsorption system to comply with subsection 725.988(c)(1) is it being operated and maintained in accordance with the following requirements? Yes_____ No_____ N/A_____	725.988(c)(3)
725.988(c)(3)(A)	A) Following the initial startup of the control device, is all activated carbon in the control device replaced with fresh carbon on a regular basis in accordance with the requirements of Section 725.933(g) or 725.933(h)? Yes_____ No_____ N/A_____	725.988(c)(3)(A)
725.988(c)(3)(B)	B) Is all carbon that is a hazardous waste and that has been removed from the control device being managed in accordance with the requirements of Section 725.933(m), regardless of the average volatile organic concentration of the carbon? Yes_____ No_____ N/A_____	725.988(c)(3)(B)
725.988(c)(4)	If a control device other than a thermal vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system is being used to comply with subsection 725.988(c)(1), is the control device being operated and maintained in accordance with the requirements of Section 725.933(i)? Yes_____ No_____ N/A_____	725.988(c)(4)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.988(c)(5)(A)	A) Has the owner or operator demonstrated that a control device achieves the performance requirements of subsection 725.988(c)(1) by using either a performance test as specified in subsection 725.988(c)(5)(C), or a design analysis as specified in subsection 725.988(c)(5)(D)? Yes_____ No_____ N/A_____	
	Note: The following are exempt from the requirements of subsections 725.988 (c)(5)(C) and 725.988 (c)(5)(D): i. A flare; ii. A boiler or process heater with a design heat input capacity of 44 megawatts or greater; iii. A boiler or process heater into which the vent stream is introduced with the primary fuel; iv. A boiler or industrial furnace burning hazardous waste for which the owner or operator has been issued a final permit under 35 Ill. Adm. Code 702, 703, and 705 and has designed and operates in accordance with the interim status requirements of 35 Ill. Adm. Code 726, Subpart H; or v. A boiler or industrial furnace burning hazardous waste for which the owner or operator has designed and operates in accordance with the interim status requirements of 35 Ill. Adm. Code 726, Subpart H.	725.988(c)(5)(A)
725.988(c)(5)(B)	B) Has the owner or operator of a flare demonstrated the performance of each flare in accordance with the requirements specified in Section 725.933(e)? Yes_____ No_____ N/A_____	725.988(c)(5)(B)
725.988(c)(5)(C)	C) For a performance test conducted to meet the requirements of subsection 725.988(c)(5)(A) of this Section, has the owner or operator used the test methods and procedures specified in Section 725.934(c)(1) through (c)(4)? Yes_____ No_____ N/A_____	725.988(c)(5)(C)
725.988(c)(5)(D)	D) For a design analysis conducted to meet the requirements of subsection 725.988(c)(5)(A) of this Section, does the design analysis meet the requirements specified in Section 725.935(b)(4)(C)? Yes_____ No_____ N/A_____	725.988(c)(5)(D)
725.988(c)(5)(E)	E) Has the owner or operator demonstrated that a carbon adsorption system achieves the performance requirements of subsection 725.988(c)(1)? Yes_____ No_____ N/A_____	725.988(c)(5)(E)
725.988(c)(6)	**Note:** If the owner or operator and the Agency do not agree on a demonstration of control device performance using a design analysis, the disagreement must be resolved using the results of a performance test performed by the owner or operator in accordance with the requirements of subsection 725.988(c)(5)(C). The Agency may choose to have an authorized representative observe the performance test.	725.988(c)(6)
725.988(c)(7)	Has the owner or operator inspected and monitored the closed-vent system and control device in accordance with the procedures specified in Section 725.933(f)(2) and (k)? Yes_____ No_____ N/A_____ Have readings from each monitoring device required by subsection 725.933(f)(2) been inspected at least once each operating day to check control device operation? Yes_____ No_____ N/A_____ Were any necessary corrective measures immediately implemented to ensure the control device is operated in compliance with the requirements of this Section? Yes_____ No_____ N/A_____	725.988(c)(7)
725.989(a)	**Section 725.989 Inspection and Monitoring Requirements** Has the owner or operator inspected and monitored air emission control equipment used to comply with this Subpart in accordance with the requirements specified in Sections 725.985 through 725.988? Yes_____ No_____ N/A_____	725.989(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.989(b)	Has the owner or operator developed and implemented a written plan and schedule to perform the inspections and monitoring required by subsection 725.989(a) and incorporated this plan and schedule into the facility inspection plan required under Section 725.115?	725.989(b)
	Section 725.990 Recordkeeping Requirements	
725.990(a)	Has the owner or operator of a facility subject to the requirements in this Subpart recorded and maintained the information specified in subsections (h) through (j) of this Section, as applicable to the facility? Yes_____ No_____ N/A_____	
	Except for air emission control equipment design documentation and information required by subsection (j) of this Section, have records required by this Section been maintained in the operating record for a minimum of three years? Yes_____ No_____ N/A_____	725.990(a)
	Have air emission control equipment design documentation been maintained in the operating record until the air emission control equipment is replaced or is otherwise no longer in service? Yes_____ No_____ N/A_____	
	Has information required by subsections (i) and (j) of this Section been maintained in the operating record for as long as the waste management unit is not using air emission controls specified in Sections 725.985 through 725.988, in accordance with the conditions specified in Section 725.980(d) or (b)(7), respectively? Yes_____ No_____ N/A_____	
725.990(b)(1)	Do the records for a tank using air emission controls include the following information?	
	A) A tank identification number? Yes_____ No_____ N/A_____	
	B) A record for each inspection required by Section 725.985 that includes the following information:	725.990(b)(1)
	i) Date inspection was conducted. Yes_____ No_____ N/A_____	
	ii) For each defect detected during the inspection, the location of the defect, the date of detection, and the corrective action taken to repair the defect? Yes_____ No_____ N/A_____	
	In the event that repair of the defect is delayed in accordance with the provisions of Section 725.985, has the owner or operator recorded the reason for the delay and the date that completion of repair of the defect is expected? Yes_____ No_____ N/A_____	
725.990(b)(2)	Has the owner or operator recorded the following information, as applicable to the tank:	
	A) For a fixed roof tank using Tank Level One controls, records for each determination for the maximum organic vapor pressure of the hazardous waste in the tank, including the following information:	
	i) Date and time the samples were collected? Yes_____ No_____ N/A_____	
	ii) The analysis method used and the analytical results? Yes_____ No_____ N/A_____	725.990(b)(2)
	iii) The analysis results? Yes_____ No_____ N/A_____	
	B) For an internal floating roof using tank level 2 controls, documentation describing the floating roof design? Yes_____ No_____ N/A_____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	C) For an external floating roof using tank level 2 controls, documentation including the following information: i) The floating roof design and the dimensions of the tank? Yes_____ No_____ N/A_____ ii) Records for each seal gap inspection including the date the measurements were performed, the raw data obtained for the measurements, and the calculations of the total gap surface area. In the event that the seal gap measurements do not conform to the specifications in Section 725.985(f)(1), the records must include a description of the repairs that were made, the date the repairs were made, and the date the tank was emptied, if necessary? Yes_____ No_____ N/A_____ D) For an enclosure, documentation including the following: i) Records for the most recent set of calculations and measurements performed by the owner or operator to verify that the enclosure meets the criteria of a permanent total enclosure as specified in "Procedure T--Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741, appendix B, incorporated by reference 35 Ill. Adm. Code 720.111? Yes_____ No_____ N/A_____ ii) Records required for the closed-vent system and control device in accordance with the requirements of subsection (e) of this Section? Yes_____ No_____ N/A_____	
725.990(c)	Has the owner or operator of a surface impoundment prepared and maintained records in accordance with the requirements in subsections 725.990(c)(1) through 725.990(c)(4)? Yes_____ No_____ N/A_____	725.990(c)
725.990(d)	Has the owner or operator using Container Level 3 air emission controls prepared and maintained records including the following information: 1) Records for the most recent set of calculations and measurements performed by the owner or operator to verify that the enclosure meets the criteria of a permanent total enclosure as specified in "Procedure T--Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741, appendix B, incorporated by reference in 35 Ill. Adm. Code 720.111. Yes_____ No_____ N/A_____	725.990(d)
	2) Records required for the closed-vent system and control device in accordance with the requirements of subsection (e) of this Section. Yes_____ No_____ N/A_____	
725.990(e)	Has the owner or operator using a closed vent system and control device in accordance with the requirements of 725.988 prepared and maintained records including the following information: 1) Documentation for the closed-vent system and control device that includes:	
725.990(e)(1)(A)	A) Certification that is signed and dated by the owner or operator stating that the control device is designed to operate at the performance level documented by a design analysis as specified in subsection (e)(1)(B) of this Section or by performance tests as specified in subsection (e)(1)(C) of this Section when the tank, surface impoundment, or container is or would be operating at capacity or the highest level reasonably expected to occur. Yes_____ No_____ N/A_____	725.990(e)(1)(A)
725.990(e)(1)(B)	B) If a design analysis is used, does the documentation include information prepared by the owner or operator or provided by the control device manufacturer or vendor that describes the control device design in accordance with Section 725.935(b)(4)(C) and certification by the owner or operator that the control equipment meets the applicable specifications. Yes_____ No_____ N/A_____	725.990(e)(1)(B)
725.990(e)(1)(C)	C) If performance tests are used, does the documentation include a performance test plan as specified in Section 725.935(b)(3) and all test results. Yes_____ No_____ N/A_____	725.990(e)(1)(C)
725.990(e)(1)(D)	D) Is additional information as required by Section 725.935(c)(1) and (c)(2) provided as applicable? Yes_____ No_____ N/A_____	725.990(e)(1)(D)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.990(e)(1)(E)	E) Has the owner or operator recorded the following information as applicable: i) A description of the planned routine maintenance that is anticipated to be performed for the control device during the next six-month period. This description must include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods? Yes_____ No_____ N/A_____	725.990(e)(1)(E)
	ii) A description of the planned routine maintenance that was performed for the control device during the previous six month period. This description must include the type of maintenance performed and the total number of hours during those six months that the control device did not meet the requirements of Section 725.988(c)(1)(A), (c)(1)(B), or (c)(1)(C), as applicable, due to planned routine maintenance? Yes_____ No_____ N/A_____	
725.990(e)(1)(F)	F) Has the owner or operator recorded the following information as applicable: i) The occurrence and duration of each malfunction of the control device system? Yes_____ No_____ N/A_____	
	ii) The duration of each period during a malfunction when gases, vapors, or fumes are vented from the waste management unit through the closed-vent system to the control device while the control device is not properly functioning? Yes_____ No_____ N/A_____	725.990(e)(1)(F)
	iii) Actions taken during periods of malfunction to restore a malfunctioning control device to its normal or usual manner of operation? Yes_____ No_____ N/A_____	
725.990(e)(1)(G)	G) Has the owner or operator recorded information concerning the management of carbon removed from a carbon adsorption system conducted in accordance with Section 725.988(c)(3)(B)? Yes_____ No_____ N/A_____	725.990(e)(1)(G)
725.990(f)	Has the owner or operator of a tank, surface impoundment, or container, exempted from standards in accordance with the provisions of Section 725.983(c) of this Subpart, prepared and maintained the following records as applicable: 1) For tanks, surface impoundments, or containers exempted under the hazardous waste organic concentration conditions specified in Section 725.983(c)(1) or 725.984(c)(2)(A) through (c)(2)(F), information used for each waste determination (e.g., test results, measurements, calculations, and other documentation). If analysis results for waste samples are used for the waste determination, then the owner or operator shall record the date, time, and location that each waste sample is collected in accordance with the applicable requirements of 725.984 of this Subpart? Yes_____ No_____ N/A_____	725.990(f)
	2) For tanks, surface impoundments, or containers exempted under the provisions of Section 725.983(c)(2)(G) or (c)(2)(H), the identification number for the incinerator, boiler, or industrial furnace in which the hazardous waste is treated? Yes_____ No_____ N/A_____	
725.990(g)	For any cover the owner or operator has designated as unsafe to inspect and monitor, has the following information been recorded in a log in the facility operating record: Identification numbers for waste management units with covers that are unsafe? Yes_____ No_____ N/A_____ An explanation why each management unit is unsafe? Yes_____ No_____ N/A_____ A plan and schedule for inspecting and monitoring each cover? Yes_____ No_____ N/A_____	725.990(g)
725.990(i)	For those organic peroxide units that are subject to 725.980(d), has the owner or operator recorded and maintained the following information: 1) A list of the individual organic peroxides manufactured at the facility that meet the conditions of 725.980(d)(1) Yes_____ No_____ N/A_____	725.990(i)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	2) A description of how the organic peroxide wastes identified in (i)(1) are managed at the facility identification number for the unit, the purpose and placement of the unit in management train of this hazardous waste, and the procedures used to dispose of the waste. Yes_____ No_____ N/A_____	
	3) An explanation of why air emission controls would be unsafe to use on this unit? Yes_____ No_____ N/A_____	
725.990(j)(1)	Has the owner or operator recorded and maintained any certification that the waste management unit not using air emission controls in accordance with the provisions of Section 265.980(b)(7) is equipped with and operating air emission controls in accordance the requirements of an applicable Clean Air Act regulation codified under CFR parts 60-63. Yes_____ No_____ N/A_____	725.990(j)(1)
725.990(j)(2)	Has the owner or operator included in its records an identification of the specific federal requirements codified under 40 CFR parts 60-63 with which the waste management unit is in compliance. Yes_____ No_____ N/A_____	725.990(j)(2)
	SUBPART DD: CONTAINMENT BUILDINGS	
725.1101(a)(1)	Is the containment building completely enclosed with a floor, walls and roof to prevent exposure to the elements? Yes_____ No_____ N/A_____	725.1101(a)(1)
725.1101(a)(2)	Are the floors and walls of the secondary containment building designed and constructed: To have sufficient strength to support themselves, the waste contents, personnel, and any heavy equipment that operate within the unit? Yes_____ No_____ N/A_____ To prevent failure due to pressure gradients, settlement, compression, uplift, physical contact with hazardous waste, climatic conditions, or the stresses of daily operation, including the contact of heavy equipment with containment walls? Yes_____ No_____ N/A_____ To be chemically compatible with wastes? Yes_____ No_____ N/A_____ To meet the structural integrity requirements established by professional organizations such as the American Concrete Institute (ACI) or ATSM? Yes_____ No_____ N/A_____ **Note:** Exceptions to the structural integrity requirements apply to windows and light doors that are dust barriers and are designed and operated in a fashion that wastes do not come into contact with these openings.	725.1101(a)(2)
725.1101(a)(3)	Are incompatible wastes or treatment reagents that could cause the unit or secondary containment system to leak, corrode, or fail, kept from the containment unit? Yes_____ No_____ N/A_____	725.1101(a)(3)
725.1101(a)(4)	Does the building have a primary barrier designed to withstand the movement of personnel, waste, and handling equipment during the operating life of the unit. Yes_____ No_____ N/A_____	725.1101(a)(4)
725.1101(b)	**Note:** The following requirements are for containment building units used to manage waste with fee liquids or treated with free liquids.	
725.1101(b)(1)	Is the primary barrier designed and constructed of materials to prevent the migration of hazardous constituents into the barrier? Yes_____ No_____ N/A_____	725.1101(b)(1)
725.1101(b)(2)	Does the unit have a liquid collection and removal system to minimize the accumulation of liquid on the primary barrier? Yes_____ No_____ N/A_____	725.1101(b)(2)
725.1101(b)(2)(A)	Is the liquid removal system sloped to drain liquids from the system? Yes_____ No_____ N/A_____	725.1101(b)(2)(A)

725.1101(b)(2)(B)	Are liquids collected and removed to minimize hydraulic head on the containment system at the earliest practicable time? Yes_____ No_____ N/A_____	725.1101(b)(2)(B)
725.1101(b)(3)	Does the unit have a secondary containment system? Yes_____ No_____ N/A_____ Is the secondary barrier designed and constructed to prevent migration of hazardous constituents into the barrier? Yes_____ No_____ N/A_____ Does the unit have a leak detection system that is capable of detecting failure of the primary barrier? Yes_____ No_____ N/A_____ Can the secondary containment collect accumulated hazardous waste for removal at the earliest practicable time? Yes_____ No_____ N/A_____	725.1101(b)(3)
725.1101(b)(3)(B)	If treatment is conducted in the building, is the unit designed to prevent the release of liquids, wet materials, or liquid aerosols to other portions of the building? Yes_____ No_____ N/A_____	725.1101(b)(3)(B)
725.1101(b)(3)(C)	Is the secondary containment system constructed of materials that are chemically resistant to the waste and liquids managed in the containment building and of sufficient strength and thickness to prevent collapse from overlaying materials or equipment? Yes_____ No_____ N/A_____	725.1101(b)(3)(C)
725.1101(c)(1)(A)	Has the owner or operator maintained the primary barrier free of cracks, gaps, corrosion, or other deterioration that could cause hazardous wastes to be released from the primary barrier? Yes_____ No_____ N/A_____	725.1101(c)(1)(A)
725.1101(c)(1)(B)	Has the owner or operator maintained the level of the stored or treated waste within the containment walls of the unit so that the height of any containment wall is not exceeded? Yes_____ No_____ N/A_____	725.1101(c)(1)(B)
725.1101(c)(1)(C)	Has the owner or operator taken measures to prevent the tracking of hazardous waste out of the unit by personnel or equipment used in handling the waste? Yes_____ No_____ N/A_____	725.1101(c)(1)(C)
725.1101(c)(1)(D)	Has the owner or operator taken measures to control fugitive dust emissions such that any openings exhibit no visible emissions, even when vehicles or personnel enter or exit the site? Yes_____ No_____ N/A_____ Are any particulate collection devices designed and maintained with sound air pollution control practices? Yes_____ No_____ N/A_____	725.1101(c)(1)(D)
725.1101(c)(2)	Has the owner or operator obtained certification by a qualified registered professional engineer (PE) that the containment building design meets the requirements of subsections (a) through (c) of this Section? Yes_____ No_____ N/A_____	725.1101(c)(2)
725.1101(c)(3)	Has the owner or operator repaired any condition that could lead to or has caused a release of hazardous wastes? Yes_____ No_____ N/A_____ If a release has been detected, has the owner or operator entered a record of the discovery in the facility operating record? Yes_____ No_____ N/A_____ If a release has been detected, has the owner or operator immediately removed the portion of the facility affected by the condition from service? Yes_____ No_____ N/A_____ If a release has been detected, has the owner or operator determined what steps must be taken to repair the containment building, remove any leakage from the secondary containment system, and establish a schedule for accomplishing cleanup and repairs? Yes_____ No_____ N/A_____	725.1101(c)(3)
725.1101(c)(3)(A)	If a release has been detected, has the owner or operator notified the Agency within 7 days after the discovery of the condition, and within 14 days provided a written description and schedule of the steps taken to repair the unit?	

	Yes_____ No_____ N/A_____	725.1101(c)(3)(A)
	Upon completing all repairs and/or cleanup, has the owner or operator notified the Agency in writing and provided a verification by a professional engineer that the repairs and cleanup have been completed in accordance with subsection (c)(3)(A)(iv) above? Yes_____ No_____ N/A_____	
725.1101(d)	For containment buildings that contain areas both with and without secondary containment, has the owner or operator designed and operated each are in accordance with subsections (a) through (c) above, taken measures to prevent the release of liquids or wet materials into areas without secondary containment, and maintained in the facility's log a written description of the operating procedures used to maintain the integrity of the areas without secondary containment? Yes_____ No_____ N/A_____	725.1101(d)
725.1102	If the owner or operator closed any containment buildings, have they done so in accordance with 725.1102? Yes_____ No_____ N/A_____	725.1102
	SUBPART EE: HAZARDOUS WASTE MUNITIONS AND EXPLOSIVES STORAGE The requirements of this Subpart apply to owners or operators who store munitions and explosive hazardous wastes, except as otherwise provided by Section 725.101. BOARD NOTE: Depending on explosive hazards, hazardous waste munitions and explosives may also be managed in other types of storage units, including containment buildings (Subpart DD), tanks (Subpart J) or containers (Subpart I). See 35 Ill. Adm. Code 726.305 for storage of waste military munitions.	
725.1201(a)	**Section 725.1201 Design and Operating Standards** Has the owner or operator of a hazardous waste munitions and explosives storage unit designed and operated the unit with containment systems, controls, and monitoring that fulfill each of the following requirements: 1) Minimized the potential for detonation or other means of release of hazardous waste, hazardous constituents, hazardous decomposition products, or contaminated run-off to the soil, ground water, surface water, and atmosphere? Yes_____ No_____ N/A_____	725.1201(a)
	2) Provided a primary barrier, which may be a container (including a shell) or tank, designed to contain the hazardous waste? Yes_____ No_____ N/A_____	
	3) Prevented the outdoor storage of waste, and containers in standing precipitation? Yes_____ No_____ N/A_____	
	4) Provided a secondary containment system for liquid wastes that assures that any released liquids are promptly detected, contained, and removed from the waste area? Yes_____ No_____ N/A_____ Or provided a vapor detection system that assures that any released liquids or vapors are promptly detected and an appropriate response taken? Yes_____ No_____ N/A_____	
	5) Provided monitoring and inspection procedures that assure the controls and containment systems are working as designed and that releases are not escaping from the unit? Yes_____ No_____ N/A_____	
725.1201(b)	**Note:** Hazardous waste munitions and explosives may be stored in one of the following? Earth-covered magazines Above-ground magazines Outdoor or open storage areas	
725.1201(b)(1)	Has the owner or operator of an earth-covered magazine fulfilled each of the following requirements: A) The magazine is constructed of waterproofed, reinforced concrete or structural steel arches, with steel doors that are kept closed when not being accessed? Yes_____ No_____ N/A_____ B) The magazine is so designed and constructed to fulfill each of the followings requirements:	

	i) The magazine is of sufficient strength and thickness to support the weight of any explosives or munitions stored and any equipment used in the unit? Yes_____ No_____ N/A_____ ii) The magazine provides working space for personnel and equipment? Yes_____ No_____ N/A_____ iii) The magazine can withstand movement activities that occur in the unit? Yes_____ No_____ N/A_____ C) The magazine is located and designed with walls and earthen covers that will direct an explosion in the unit in a safe direction so as to minimize the propagation of an explosion to adjacent units and to minimize other effects of any explosion? Yes_____ No_____ N/A_____	725.1201(b)(1)
725.1201(b)(2)	Are above-ground magazines located and designed so as to minimize the propagation of an explosion to adjacent units and to minimize other effects of any explosion? Yes_____ No_____ N/A_____	725.1201(b)(2)
725.1201(b)(3)	Are outdoor or open storage areas located and designed so as to minimize the propagation of an explosion to adjacent units and to minimize other effects of any explosion? Yes_____ No_____ N/A_____	725.1201(b)(3)
725.1201(c)	Has the owner or operator stored hazardous waste munitions and explosives in accordance with a Standard Operating Procedure that specifies procedures which ensure safety, security and environmental protection? Yes_____ No_____ N/A_____	
	Note: If these procedures serve the same purpose as the security and inspection requirements of Section 725.114, the preparedness and prevention procedures of Subpart C of this Part, and the contingency plan and emergency procedures requirements of Subpart D of this Part, then the Standard Operating Procedure may be used to fulfill those requirements.	725.1201(c)
725.1201(d)	Have hazardous waste munitions and explosives been packaged to ensure safety in handling and storage? Yes_____ No_____ N/A_____	725.1201(d)
725.1201(e)	Has the owner or operator inventoried hazardous waste munitions and explosives at least annually? Yes_____ No_____ N/A_____	725.1201(e)
725.1201(f)	Is the owner or operator inspecting and monitoring hazardous waste munitions and explosives and their storage units as necessary to ensure explosives safety and to ensure that there is no migration of contaminants out of the unit? Yes_____ No_____ N/A_____	725.1201(f)
	Section 725.1202 Closure and Post-Closure Care	
725.1202	Has a magazine or other unit used to store hazardous waste under this Subpart been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.1202

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TANK DISPOSITION FORM

Tank # (or other identifier): _____ Age: _____ Type of Scndry Cont: _____

Type (Above, on, in or below ground): _____ Volume (In gal): _____

Waste Description and HW #: _____

Subject to Part 725, Subpart AA, BB and/or CC: _____

Air Pollutant Emissions Controlled by: Tank Level 1 Controls _____ Tank Level 2 Controls _____

What type of control device used? _____

Violations of 725.985 Requirements Observed? (Y/N): _____

List Specific Subsections Violated: _____

_____

Tank # (or other identifier): etc. _____

_____