ENVIRONMENTAL COMPLIANCE AUDIT CHECKLIST

Pursuant to: California Code of Regulations (CCR) Title 22, 29 Code of Federal Regulations,
40 CFR 112, NPDES & IUDP Permit, SDAPCD, MCO P5090.2A, MCAS HWMP

Unit / Facility: _____ **Date:** _____

Location: _____ **Permit No(s):** _____

POC / Phone: _____

HAZARDOUS WASTE COORDINATORS (HWC)

Primary: _____ **HWC Course Date:** _____ **HWC Refresher Date:** _____

Alternate: _____ **HWC Course Date:** _____ **HWC Refresher Date:** _____

	LINE ITEMS	FINDINGS		
1.	**ENVIRONMENTAL RECORDS VOLUME I: COMPLIANCE ORDERS BINDER.**	**Yes**	**No**	**NA**
	a. Is a copy of the current CO's Environmental Policy Statement maintained in this binder? *[HWMP, Ch9, 3.a.]*			
	b. Does unit maintain or have access to current copy of HWMP, SPCC, Air Quality Management Plan, SWPPP, SCP, and ISWMP? *[HWMP, Ch9, 3.(a)] (Online access is acceptable)*			
	c. Is the most current copy of the Environmental Compliance Audit maintained in this binder? *[HWMP, Ch9, 3.a.]*			
2.	**ENVIRONMENTAL RECORDS VOLUME II: BUSINESS PLAN BINDER.**	**Yes**	**No**	**NA**
	a. Is the Unified Program Facility Permit (Health Permit) up-to-date and maintained in this binder? *[HSC 25404(c)(1)(A); HMD Unified Program Facility Permit HM-906]*			
	b. Is the Emergency Response/Contingency Plan up-to-date and maintained in this binder? *[HSC 25503.5]*			
	c. Are Appointment Letters and Billet Descriptions for the Primary and Alternate Hazardous Waste Coordinators available? *[CCR 66265.16; HWMP Ch9, 3.b.]*			
	d. Are HW training certificates for HWCs (Pri/Alt) current and available? *[HWMP, Ch1, 4.a.(2)(c)]*			
	e. Is the Section 1-4 training attendance roster up-to-date and available? *[HSC 25504, HWMP,Ch 8,6.e.]*			
	f. Are copies of the Emergency Response/Contingency Plan Training Plans, Sections 1- 4 available? *[HSC 25504; HWMP, Ch8, 6., and Ch 9, 3.b.]*			
	g. Are all HM listed on the Unit's AUL? *[StaO 5100.1 Encl6; HWMP, Ch2, 3.a.(1)]*			
	h. Does the Unit accumulate medical waste i.e. sharps, pharmaceutical, biohazard? If so, include the Medical Waste Compliance checklist with this audit. *[HSC 117960; HWMP, Ch9, 3.b.]*			
	i. Are copies of the most recent County of San Diego HMD Inspection available? *[HWMP, Ch9, 3.(b)]*			
	j. Is the HW Coordinator (Pri/Alt) familiar with business plan spill notification procedures?			
3.	**ENVIRONMENTAL RECORDS VOLUME III: RECORD KEEPING BINDER.**	**Yes**	**No**	**NA**
	a. Are weekly site inspections performed, records and hazardous waste inventory maintained? *[CCR 66265.174; HWMP, Ch9, 3.c.]*			
	b. Are Daily Above Ground Storage Tank (AST) Inspections performed and records maintained for the Used Oil AST? *[CCR 66265.195(a); HWMP, Ch9, 3.c.]*			
	c. Are waste disposal receipts maintained in this binder i.e. turn-in sheets, DD1348, vendor receipts, Waste Transfer Log? *[CCR 66265.73(b)(1;, HWMP, Ch9, 3.c.]*			
	d. Are discharges from the silver recovery unit tested at least once every three months using a silver test paper and documented in the silver recovery-operating logbook? *[IUDP Permit 05-1019 App D; HWMP, Ch9, 3.c.]*			
	e. Is the Used Oil AST Certification and Engineering Exemption up-to-date and maintained in this binder? *[CCR 66265.192(j)]*			
4.	**OTHER REQUIRED DOCUMENTS:**	**Yes**	**No**	**NA**
	a. Are spills recorded in the "Spill Log" with the spill date, time, product spilled, quantity, location, cleanup, actions taken and the name of the person reporting the spill? *[CCR 66265.56(j); HWMP, Ch7, 3.e.]*			
	b. Is a SDS for each required Hazardous Material (HM) readily accessible to each employee? *[29CFR 1910.1200(g)(8); StaO 5100.1 Encl 6]*			
5.	**SATELLITE ACCUMULATION AREA (SAA):**	**Yes**	**No**	**NA**
	a. Is satellite area authorized by Waste Management Division and identified in Unit's Contingency Plan? *[HWMP, Ch4, 4.b.(1)]*			
	b. Is the satellite area limited to less than 55 gallons total? *[MCO P5090.2A, 9104.h.(1), HMWP Ch4, 4.b.(5)]*			
	c. Are the correct waste labels, filled out, legible, and visible for inspection? *[CCR 66262.34(f)(1)&(3)]*			
	d. Are weekly satellite area inspections conducted and records maintained? *[HWMP Ch4, b.(7)]*			

	e. Is the waste moved to 60-day WAS within nine months of the ASD or when the container is full, whichever occurs first? *[HWMP,Ch4, 4.b.(6)]*			
	f. Is the waste moved to the 60-day site within 3 day of the container fill date? *[CCR 66262.34(e)(3); [HWMP,Ch4, 4.b.(6)]*			
6.	**HAZARDOUS WASTE ACCUMULATION SITE (HWAS):**	**Yes**	**No**	**NA**
	a. Are the correct waste labels used, filled out, legible, securely attached and visible for inspection? *[CCR 66262.34(f)(1)&(3); HWMP Ch4, 5.d. and 6.]*			
	b. Are the containers compatible with the waste inside the container? Check containers, including tanks, for deterioration and structural integrity. *[CCR 66264.172; HMWP Ch4, 5.a.]*			
	c. Are the containers kept closed and secured except when waste is being added or removed? *[CCR 66264.173(a), APCD Rule 67.17(d)(1); HMWP Ch4, 5.e.]*			
	d. Are drums/tanks/containment areas (tops, sides and/or decks) kept clean and free of spill residue? *[HWMP Ch2, 3.e.(7), Ch4, 5.(c)]*			
	e. Are containers with ignitable waste grounded during waste accumulation and are waste lockers grounded appropriately? *[29CFR 1910.107(e)(9), NFPA Code 30, 2008 edition, Chapter 18, Section 18.4.2.2]*			
	f. Is the initial accumulation start date (ASD) of the waste clearly marked and visible on each container and less than 60 days? *[HWMP Ch4, 6.b,7.a]*			
	g. Is the full date clearly marked and visible on each container of waste that was generated at a "Satellite Accumulation Area" (SAA)? *[CCR 66262.34(e)(1)(C)]*			
	h. Are incompatible wastes separated (i.e., no oxidizers next to flammables) by means of a dike, berm, wall or other device and with adequate aisle space for access and/or inspection? *[CCR 66265.177(c)]*			
	i. Are containers or inner liners larger than five gallons that previously held HM/HW properly marked with words EMPTY and the date it was emptied? *[CCR 66261.7(f); HWMP Ch14]*			
	j. Is secondary containment damage free, and free of liquids and debris, and drainage valves leak tight and kept closed? *[40CFR 112.8(c)(3); CCR 66265.175]*			
	k. Has the secondary containment drainage log been completed after every drainage event? *[SPCC 4.2.3, App B]*			
	l. Are warning signs clearly visible and legible from a distance of 25' in any direction? (No Smoking, HW Area [bilingual if necessary]) *[CCR 66265.17(a); 66265.14(c)]*			
	m. During the workplace walk-through, are HWs properly containerized and are drip pans placed underneath all leaking aircraft, machinery and equipment? *[CCR 66265.31; HWMP Ch2, 3.e.(1) and Ch4, 5.]*			
	n. Are eyewash stations & fire extinguishers available and in serviceable condition? *[29 CFR 1910.151(c), CCR 66265.32(c) , ANSI Z358.1 5.5.2]*			
	o. Is emergency spill response equipment (communication alarm and spill kit) available and adequately stocked? *[CCR 66265.32(a)-(d), HWMP Ch7, 4.h.]*			
	p. Is unauthorized access to used oil tank, SAA, or HWAS prevented? (locked/secured) *[HWMP Ch4, 4.a.(4)]*			
	q. Are lead-acid batteries marked with the date removed from service? *[HWMP, Ch14]*			
7.	**RECYCLING:**	**Yes**	**No**	**NA**
	a. Does the unit require a used tire TPID number?			
	b. Are tires being stored in a manner which prevents the breeding and harborage of vectors? [Title 14, CCR 17353(a)]			
	c. Are copies of tire manifest CTLs maintained for minimum 3 years? [Title 14, CCR 17353(a)]			
	c. Is Unit recycling to the maximum extent practicable? *[ISWMP, Ch4, 4.1)]*			

Supervisor: _____ **Date:** _____

Unit Coordinator: _____ **Date:** _____

Inspector: _____ **Date:** _____

Notes: