

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.

Activity:	WAS Permit #:	Date:	Phone #:			
HAZARDOUS WASTE COORDINATORS (HWC)			24HR DATE	8HR DATE		
Primary:						
Alternate:						
Supervisor:						
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)(g)]					
	b. Is there a copy of HWMP, SPCC, Air Quality Management Plan, SWPPP, and ISWMP and are these copies the most current? [HWMP, Ch9(3)(a)]					
	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.					
	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 Hazardous Material Business Plan up-to-date and maintained in this binder? [HSC 25503.5]					
	c. Are the Appointment Letters and Billet Descriptions for the Primary and Alternate Hazardous Waste Coordinator available? [CCR 66265.16; HWMP Ch9(3)(b)]					
	d. Are HWC Training Certificates for the (Pri/Alt) current and available? [HWMP, Ch1(4)(a)(2)(c)]					
	e. Is the Topics 1-4 Training Attendance Roster up-to-date and available? [HSC 25504, HWMP, Ch 8(6)(e)]					
	f. Are copies of the Business Plan Training Plans, Topics 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.					
	a. Are weekly site inspections performed and records 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 monthly AST Facility Inspections performed and records maintained for the petroleum product (JP-5, diesel, gasoline, etc.)? [HSC 25270.4.5; 40 CFR 112.7(e); SPCC; MCAS UST/AST Mgt Plan.]					
	d. 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)]					
	e. 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)]					
	f. 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:					
	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 an MSDS for each required Hazardous Material (HM) readily accessible to each employee? [29CFR 1910.1200(g)(8); StaO 5100.1 Encl 6]					
LINE ITEMS				FINDINGS		
5.	SATELLITE ACCUMULATION AREA (SAA):					

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	a. Is satellite area authorized by Waste Management Division and identified in Unit's Business Plan? [HWMP, Ch4(4)(b)(1)]			
	b. Is the satellite area limited to less than 55 gallons total? [MCO P5090.2A Chap9.9104(1)(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(b)(6)]			
6.	HAZARDOUS WASTE ACCUMULATION SITE (HWAS):			
	a. Are the correct waste labels used, filled out, legible, 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 for deterioration and structural integrity. [CCR 66264.172; HWMP Ch4(5)(a)]			
	c. Are the containers kept closed except when waste is being added or removed? [CCR 66264.173(a), APCD Rule 67.17(d)(1); HWMP Ch4(5)(e)]			
	d. Are all spills cleaned up immediately and 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? [CCR 66262.34(f)(1)]			
	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); CCR66265.175]			
	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; HWMPch2(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)]			

Unit Coordinator: _____ **Supervisor:** _____

Inspector: _____ **Reviewed:** _____ **Date:** _____

NOTES: _____

