

EPA SELF AUDIT

Hazardous Waste Determination

- a) analyzer in labs (hazardous waste residue in test container)
- b) metals from shops (brass in plumbing shop) (brass cuttings from key shop)
- c) pharmacy toxic listing (some drugs become EPA High hazard Waste when discarding)

Dental Amalgam

- a) notify DEP of installation of separator
- b) recycle amalgam instead of disposing of (New ?)

Hazardous waste transporting

- a) storage areas and satellite areas (but satellite areas must be monitored 24-7 if materials are stored temporarily)

Storage Areas

- a) signage with emergency notification #s
- b) phone in the area not near by behind a locked door
- c) posting of emergency phone #s for notification
- d) “Hazardous Waste Storage Room “ sign on the door

C-7 form for below items (Notification of Recycling to EPA) non RCRA

- a) brass plumbing scrap , brass key cuttings
- b) computer waste , (monitors, CPU, keyboards) E-Waste

Toxic Substances

- a) ballasts non PCB ok , PCB ballasts be careful too many can make you a large quantity generator.
- b) DOT training for hazardous waste handlers every 3 years
- c) Regulated medical waste manifest 3 years of records (2 copies)
- d) Storage rooms should have signage “ Regulated Medical Waste Storage Area”
- e) Training for personnel who sign Manifests.

EPA SELF AUDIT

AIR

- a) Title V (if applicable) very comprehensive audit
- b) Certified Tech for refrigeration equipment charging
- c) Labels missing on small refrigerant bottles.

Waste Water Silver Recovery

- a) Silver recovery quarterly documentation of maintenance
- b) Total amount of water treated
- c) Verification of amount of silver removed
- d) Possible annual maintenance if small unit is used must keep log of each use day , amount of processing and annual maintenance records.

Oil Storage

- a) day tank storage information incorrect
- b) Underground diesel storage tanks for Generators (test for water daily.) possibly not have to do if annual pressure test is done on tanks.
- c) Tank marked incorrectly should be marked USED OIL we had it marked WASTE OIL.
- d) Tank Fill Ports must be properly color coded
- e) Fill Port trough should be free of oil residue

Universal Waste

- a) Better Training for Universal Waste Handlers

Community Right To Know

- a) Sulfuric Acid not in our inventory (battery acids) etc.