



Colorado Department  
of Public Health  
and Environment

## DOCUMENT REVIEW LIST Hazardous Waste Generator Compliance Evaluation Inspections

### Inspection Process

A Compliance Evaluation Inspection (CEI) consists of a site tour and a document review. The inspector will make a determination during the inspection as to whether the site tour or document review will be conducted first. Typically, the CEI begins with an opening conference to obtain background information on the facility operations and waste generation processes. During the opening conference, the inspector will verify the facility's generator status and determine if they conduct other hazardous waste management activities. The inspector will then conduct a site tour where hazardous waste generation processes and accumulation areas are evaluated. The inspector usually has a camera during the site tour and may take photographs to document violations.

After the site tour, the inspector will conduct a document review. Typically, facility personnel are informed of the types of documents that will be needed for the review at the time the inspection is scheduled. Additional documents may be requested during the inspection and copies may be made of any records reviewed during the inspection. The following summarizes the documents that may be requested and reviewed during a CEI inspection at generator facilities, as appropriate depending upon the generator status of the facility.

1. Facility maps or process flow diagrams, which may also include schematics of any wastewater treatment units and/or electroplating process lines.
2. Waste profiles for hazardous waste shipped off-site from the facility.
3. Analytical data and/or Material Safety Data Sheets used to support waste characterization.
4. Process knowledge documentation and/or analytical data used to make land disposal restriction (LDR) determinations.
5. LDR notifications and certifications for hazardous wastes generated and shipped off-site over the past three years.
6. Hazardous waste manifests for the last three years.
7. Exception reports filed by a large quantity generator (LQG).
8. Letters filed with the Department when a signed copy of the manifest from the designated facility is not received by a small quantity generator (SQG) within 60-days of waste shipment.
9. Manifest discrepancy reports provided by the designated facility.

10. Use oil invoices and/or other shipping records.
11. Records documenting that recyclable materials are being legitimately recycled.
12. Emergency contacts telephone posting at SQG facilities.
13. Training records for personnel at SQG facilities.
14. Training records documenting initial and annual training at LQG facilities.
15. Written job descriptions at LQG facilities.
16. Contingency plan and documents showing that the plan has been sent to appropriate emergency response agencies at LQG facilities.
17. Map or list of hazardous waste accumulation areas, which is required to be part of the contingency plan for a LQG.
18. Biennial Report at LQG facilities.
19. Waste analysis plans for generators conducting LDR or generator permit-by-rule treatment.
20. Weekly inspection logs for container accumulation areas, if available.
21. If applicable, written procedures for treating universal waste (all handlers) and universal waste shipment records (large quantity handlers).
22. Documentation for hazardous waste tanks including: date of installation, tank integrity assessment, secondary containment calculations to show that containment volume is adequate, information on the impervious coating, overfill protection and release detection, and daily inspection logs.
23. Documentation to evaluate compliance with the organic air emission regulations of Subpart BB and CC. For Subpart BB compliance, the inspector will evaluate information to determine whether organic waste is “in light liquid service” or “heavy liquid service,” a list of all pumps, valves, connectors and other equipment subject to the monitoring and inspection requirements, documentation of monitoring, and leak repair information.  
  
For Subpart CC compliance, the inspector will evaluate waste determination information documenting the volatile organic concentration of the waste and assess information regarding whether the tanks are subject to Tank Level 1 or level 2 controls, and tank inspection logs.
24. Air and wastewater discharge permits, if any.