RCRA Hazardous Waste Program Audit

Program Audit Checklist

Facility Name:	
Auditor:	
Date:	
Audit Period:	

Regulatory References

The following regulations and guidance documents are applicable to this program audit. Click any link to view the full text.

Regulation / Guidance Document
40 CFR Part 262 — Standards Applicable to Generators of Hazardous Waste
40 CFR Part 265 — Interim Status Standards for Owners and Operators
40 CFR Part 268 — Land Disposal Restrictions
40 CFR 262.17 — Conditions for Exemption for Large Quantity Generators
40 CFR 262.16 — Conditions for Exemption for Small Quantity Generators
EPA Hazardous Waste Generator Regulations
EPA Audit Policy — Incentives for Self-Policing

Instructions: Review each audit item and record findings in the Status and Notes columns. Use C (Compliant), NC (Non-Compliant), NA (Not Applicable), or NR (Needs Review) for the status. Document specific findings, evidence reviewed, and any corrective actions needed in the Notes column.

Generator Status and Waste Characterization

Audit Item	Expected Finding	Status	Notes / Evidence
Generator status determination	Current generator status (VSQG, SQG, LQG) is correctly determined based on actual monthly generation rates. Status is re-evaluated when generation rates change. Documentation supports the determination. » *Ref: 40 CFR 262.13*		
EPA ID number	Valid EPA Identification Number (EPA ID) is obtained and current. EPA ID is used on all manifests, reports, and correspondence. If generator status changed from VSQG, an EPA ID was obtained before shipping waste. » *Ref: 40 CFR 262.12*		
Waste characterization	All waste streams have been characterized through testing or process knowledge. Hazardous waste determinations are documented with supporting analytical data or process knowledge documentation. Waste codes are correctly assigned. » *Ref: 40 CFR 262.11*		
Waste stream inventory	Complete inventory of all hazardous waste streams is maintained. Each waste stream has		

Audit Item	Expected Finding	Status	Notes / Evidence
	an assigned waste code, typical generation rate, and accumulation location. New processes or materials are evaluated for waste characterization. » Ref: 40 CFR 262.11, 262.13		

Accumulation and Storage

Audit Item	Expected Finding	Status	Notes / Evidence
Accumulation time limits	Waste is shipped off-site within applicable time limits: 270 days for SQGs (or 90 days for LQGs). Accumulation start dates are clearly marked on all containers. Extensions for transportation distances over 200 miles are documented if applicable. » Ref: 40 CFR 262.16(b), 262.17(a)		
Satellite accumulation areas	Satellite accumulation areas (SAAs) are at or near the point of generation. No more than 55 gallons of hazardous waste (or 1 quart of acutely hazardous waste) per waste stream per SAA. Containers are in good condition and compatible with waste. » Ref: 40 CFR 262.15		
Container management	All containers are closed except when adding or removing waste. Containers are in good condition with no leaks or corrosion. Containers are compatible with the waste they hold. Weekly inspections are conducted (LQG) or as appropriate for generator status. » Ref: 40 CFR 262.16(b)(2), 265.173		
Labeling and marking	All containers are labeled with the words 'Hazardous Waste,' the accumulation start date, and the applicable waste codes. Labels are legible and visible. DOT markings are applied before transport. » Ref: 40 CFR 262.16(b)(6), 262.17(a)(5)		

Manifesting and Recordkeeping

Audit Item	Expected Finding	Status	Notes / Evidence
Manifest completion	Uniform Hazardous Waste Manifests (EPA Form 8700-22) are properly completed for all off-site shipments. Generator information, waste descriptions, handling codes, and container counts are accurate. Electronic manifesting (e-Manifest) is used where required. » Ref: 40 CFR 262.20-262.23		
Manifest tracking	Signed copies are returned from the designated facility within 35 days (or 45 days for e-Manifest). Exception reports are filed with EPA/state if signed copies are not received within 35/45 days. All manifests are retained for at least three years. » Ref: 40 CFR 262.42		
Biennial report	Biennial Report (EPA Form 8700-13A/B) is submitted by March 1 of each even-numbered year (LQGs). Report accurately reflects all		

Audit Item	Expected Finding	Status	Notes / Evidence
	hazardous waste generated, shipped, and managed during the reporting period. » Ref: 40 CFR 262.41		
Land Disposal Restrictions	LDR notifications and certifications accompany the first shipment of each waste stream to a treatment/disposal facility. Records document that waste meets applicable treatment standards or is being sent for proper treatment. » Ref: 40 CFR 268.7		

Training and Emergency Preparedness

Audit Item	Expected Finding	Status	Notes / Evidence
Personnel training	All personnel who handle hazardous waste have completed initial and annual refresher training within required timeframes. Training covers waste handling procedures, emergency response, and regulatory requirements. Training records include name, job title, date, and description of training. » Ref: 40 CFR 262.17(a)(7), 265.16		
Emergency procedures	Contingency plan (LQG) or emergency procedures (SQG) are in place and current. Emergency coordinator is designated and contact information is posted. Arrangements with local emergency responders are documented. » Ref: 40 CFR 262.16(b)(8)-(9), 262.17(a)(6)		
Emergency equipment	Required emergency equipment (fire extinguisher, spill kit, communications device) is available and maintained. Equipment is tested and inspected per schedule. Access to emergency equipment is unobstructed. » Ref: 40 CFR 262.16(b)(8), 265.32		

Corrective Actions Summary

#	Finding	Corrective Action	Responsible	Due Date
1				
2				
3				
4				
5				

Audit Sign-Off

Auditor Name:

Auditor Signature:

Date Completed:

Reviewed By:

Review Date:

Status Key: C = Compliant | NC = Non-Compliant | NA = Not Applicable | NR = Needs Review