

Note: Use this checklist for universal waste handler inspections. The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices (see Section C). A Universal Waste Handler means a generator of universal waste, or the owner or operator of a facility, including all contiguous property, that receives universal waste from other handlers, accumulates universal waste, and sends universal waste to another universal waste handler, designation facility, or to a foreign destination. **Universal waste handler does not include a person who treats, disposes or recycles universal waste, or a person engaged in the off-site transportation of universal waste [s. NR 673.09(12)(b), Wis. Adm. Code].** Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section A: Inspection Information

Inspection Date(s)	DNR Region	DNR Inspector(s)	Inspection was <input type="checkbox"/> Unannounced <input type="checkbox"/> Announced
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Section B: Facility Information

Facility Name	EPA ID Number	Facility ID (FID) Number	
Street Address	City	ZIP Code	County
Contact Name	Title	Telephone Number (include area code)	
E-Mail Address			
Legal Owner Name			Telephone Number (include area code)
Street Address	City	State	ZIP code
Personnel Present		Title	
Personnel Present		Title	

Section C: Universal Wastes Handled (includes Wisconsin-specific universal wastes)

Waste Type	Generated?	Quantity Generated	Receiving Facility
NR 673.02 Batteries (rechargeable, Ni/Cd, mercury, but not lead acid batteries subject to NR 666.080)	<input type="checkbox"/> Yes <input type="checkbox"/> No		
NR 673.03 Pesticides (suspended, cancelled or recalled)	<input type="checkbox"/> Yes <input type="checkbox"/> No		
NR 673.04 Mercury Thermostats	<input type="checkbox"/> Yes <input type="checkbox"/> No		
NR 673.05 Lamps (fluorescent, HID, mercury or sodium vapor)	<input type="checkbox"/> Yes <input type="checkbox"/> No		
8/11/06 Memo Mercury-Containing Equipment (thermometers, switches)	<input type="checkbox"/> Yes <input type="checkbox"/> No		
8/11/06 Memo Anti-Freeze (used engine coolant, propylene or ethylene glycol)	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Total Quantity Accumulated:			

1. Facility is operating as a
 Small Quantity Handler (Accumulates < 5,000 kg or 11,025 lb at any time).
 Large Quantity Handler (Accumulates ≥ 5,000 kg or 11,025 lb at any time).
 Universal Waste Destination Facility (Treat or dispose of universal waste. Subject to full regulation unless noted below).

Note: All "NR" references are to the Wisconsin Administrative Code. When entering information into the Field Investigator Site Tracking (FIST) database, only enter the **bold** citation into the Code or Statute Citation field. If more than one **bold** citation is given, enter the **bold** citation that applies.

Section D. Prohibitions

NR 673.11(1) NR 673.31(1)	1. Is universal waste disposed on-site?	<input type="checkbox"/> Yes <input type="checkbox"/> No
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NR 673.11(2) NR 673.31(2)	2. Is universal waste diluted or treated on-site?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.11(2) NR 673.31(2)	3. If Yes to 2, does the dilution or treatment activity consist of the following exceptions? <input type="checkbox"/> Sorting, mixing, discharging, regenerating, or disassembling batteries, removing batteries from consumer products or removing electrolytes. <input type="checkbox"/> Removing thermostat ampules. <input type="checkbox"/> Responding to a release of universal waste.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Section E. General Standards for Small and Large Quantity Handlers

NR 673.13 NR 673.33	1. Are universal wastes handled in the following ways to prevent releases, as appropriate? <input type="checkbox"/> Universal wastes that are broken or show evidence of leakage or spillage are placed in a closed, structurally sound container that is not leaking and compatible with the waste. <input type="checkbox"/> Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact. <input type="checkbox"/> Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules. <input type="checkbox"/> Thermostat ampules are removed in a manner to prevent breakage, conducted over a containment device, immediately cleaned up, and performed in a well ventilated, monitored environment. <input type="checkbox"/> Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200. <input type="checkbox"/> Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.14 NR 673.34	2. Are all universal wastes labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste"?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.14 NR 673.34	3. Are the containers, tanks, or transport vehicles of recalled pesticides additionally marked with the label that was on or accompanied the product when it was sold or distributed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 673.15(3) NR 673.35(3)	4. Is the length of accumulation time demonstrated by any of the following? <input type="checkbox"/> Mark or label each container with the earliest date the waste is generated or received. <input type="checkbox"/> Mark or label the individual item of waste with the date it was generated or received. <input type="checkbox"/> Maintain an inventory system identifying the date the waste was generated or received. <input type="checkbox"/> Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. <input type="checkbox"/> Use some other method that clearly demonstrates the length of accumulation time.	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.15(1) NR 673.35(1)	5. Is the universal waste accumulated for less than one year from the date generated or received from another handler?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.15(2) NR 673.35(2)	6. If No to 5, is there proof that the waste is accumulated solely to facilitate proper recovery, treatment or disposal?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 673.16 NR 673.36	7. Are employees trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.17 NR 673.37	8. Does the handler adequately respond to releases? <input type="checkbox"/> Immediately contain all releases. <input type="checkbox"/> Determine if the spill residue is hazardous waste and if so, dispose of as such.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Section F. Off-Site Shipments

NR 673.18(1) NR 673.38(1)	1. Does the handler send the waste to a destination facility, foreign destination or another handler? Facility Name:	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.18(2) NR 673.38(2)	2. If the handler self-transport, are they complying with ALL of the following requirements? <input type="checkbox"/> Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. <input type="checkbox"/> Immediately contain release and make waste determination on spill residue. <input type="checkbox"/> If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

NR 673.18(3) NR 673.38(3)	3. If a hazardous material, does the handler package, label, mark, placard and prepare the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.18(4) NR 673.38(4)	4. If shipping to another universal waste handler, does the handler agree to receive the shipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.18(5) NR 673.18(6) NR 673.38(5) NR 673.38(6)	5. If the shipment is rejected, does one of the following occur? <input type="checkbox"/> The waste is sent back to the originating handler. <input type="checkbox"/> The originating handler agrees on a destination facility to which to ship the waste.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 673.18(7) NR 673.38(7)	6. If the shipment contains hazardous waste, does the handler receiving the shipment immediately notify the Department?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 673.18(8) NR 673.38(8)	7. If the shipment contains nonhazardous, nonuniversal waste, is it managed in compliance with solid waste requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Section G. Additional Requirements for Large Quantity Handlers

NR 673.32(1)	1. Has an EPA ID# been obtained before meeting or exceeding 5,000 kg (11,025 lb)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.39(1)	2. Is there a record for each shipment of universal waste received at the facility which contains ALL of the following information? <input type="checkbox"/> The name and address of the originating handler or foreign shipper. <input type="checkbox"/> The quantity of each type of universal waste received. <input type="checkbox"/> The date the shipment was received.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 673.39(2)	3. Is there a record for each shipment of universal waste sent off-site which contains the following information? <input type="checkbox"/> The name and address of the facility to which the waste was sent. <input type="checkbox"/> The quantity of each type of universal waste sent. <input type="checkbox"/> The date the shipment of universal waste left the facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 673.39(3)	4. Are records retained for at least 3 years? <input type="checkbox"/> From the date the shipment was received. <input type="checkbox"/> From the date the shipment left the facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No

Section H: Inspection Comments and Signature

DNR Inspector Signature:	Date:
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