

RCRA Container Storage Area Checklist

Date: _____ Time: _____ Inspector's Name: _____

Checked/ Observations/ Repairs made	Requirement	Regulatory Citation
Satellite Accumulation Area		
	Is waste accumulated at or near the point of generation and “under the control of the operator”?	§262.34(c)(1)
	Container is marked with the words “Hazardous Waste” or other identifying information.	§262.34(c)(1)
	Container has less than 55 gallons of HW or less than 1 quart of acute HW.	§262.34(c)(1)
	Container is in good condition and non-leaking.	§265.171
	Waste is compatible with container that it is stored in.	§265.172
	Container is closed except when adding or removing waste.	§265.173(a)
90-Day Container Storage Area		
Container Requirements — Part 262		
	Container is marked with the accumulation start date.	§262.34(a)(2)
	Container is marked with the words “Hazardous Waste.”	§262.34(a)(3)
Container Requirements — Part 265, Subpart 1¹		
	Container is in good condition and non-leaking.	§265.171
	Waste is compatible with container that it is stored in.	§265.172
	Container is closed except when adding or removing waste.	§265.173(a)
	Container not stored in a way that would cause it to spill or leak.	§265.173(b)
	Weekly inspections are conducted.	§265.174
	Ignitable and reactive wastes are stored at least 15 meters (50 feet) from facility’s property line.	§265.176
Pre-Transport Requirements — Part 262, Subpart C		
	Packaging: Containers meet all applicable standards for the type of waste they hold. (See DOT regs at 49 <i>CFR</i> Parts 173, 178, and 179.)	§262.30
	Labeling (DOT Warning Labels): (See DOT Regs under 49 <i>CFR</i> 172).	§262.31
	Marking: Containers of 119 gallons or less must comply with DOT regs at 49 <i>CFR</i> Part 172. This includes the “proper shipping name” — 49 <i>CFR</i> 172.301. Containers must also be marked with the following words and information: <ol style="list-style-type: none"> 1. “HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.” 2. Generator’s name and address. 3. Generator’s EPA ID number. 4. Manifest tracking number. 	§262.32
Preparedness and Prevention — Part 265, Subpart C²		
	Facility is maintained in a manner to prevent fire, explosions or spills.	§265.31
	Facility must be equipped with (unless hazards posed would not require): <ol style="list-style-type: none"> 1. Internal communications to signal emergency to facility personnel. 2. Communication device to alert local emergency response personnel. 3. Fire extinguishers. 4. Fire suppression: adequate water supply or foam producing equipment. 	§265.32
	Testing and maintenance of equipment.	§265.33
	Immediate access to communication equipment when handling hazardous waste.	§265.34
	Adequate aisle space.	§265.35

¹Required by §§262.34(a)(1) and 262.34(d).

²Required by §§262.34(a)(4) and 262.34(d).