



Maine Labpack – Your Hazardous Waste Generator Checklist

This compliance checklist is designed to help laboratories, schools, hospitals, and manufacturers ensure compliance with EPA and state regulations for safely and effectively managing hazardous waste. Use it as a quick reference to stay organized and compliant.

Waste Identification

- ☐ Have all waste streams been evaluated to determine if they are hazardous?
- ☐ Is a written waste determination (with test data or knowledge of process) maintained?
- ☐ Are wastes categorized correctly (D-, F-, K-, P-/U-listed, characteristic)?
- ☐ Are Safety Data Sheets (SDS) used when applicable to support the determination?
- ☐ Are generator categories calculated monthly (Very Small Quantity Generator, Small Quantity Generator, Large Quantity Generator)?
- ☐ Is incompatible waste segregated?
- ☐ Are satellite accumulation areas clearly identified?

Storage and Containers

- ☐ Are containers in good condition, free of leaks, corrosion, or bulging?
- ☐ Are all containers kept closed except when actively adding or removing waste?
- ☐ Are containers made of materials compatible with their contents?
- ☐ Are containers properly labeled with the words “Hazardous Waste”?
- ☐ Are hazard indications (e.g., flammable, corrosive, toxic, reactive) visibly marked?
- ☐ Are secondary containment measures in place where required?
- ☐ Are incompatible wastes separated by distance or physical barriers?
- ☐ Are weekly inspections of storage areas documented?

Accumulation and Limits

Satellite Accumulation Areas (SAAs)

- ☐ Containers located at or near the point of generation?
- ☐ Under control of the operator?
- ☐ Do not exceed the 55-gallon limit for hazardous waste or 1-quart for acutely hazardous waste?
- ☐ Moved to a central accumulation area within 3 days if limits are reached?

Central Accumulation Areas (CAAs)

- ☐ Accumulation start dates clearly marked on containers?
- ☐ SQGs: Waste stored \leq 180 days (or 270 days if long distance to disposal)?
- ☐ LQGs: Waste stored \leq 90 days?
- ☐ Volume thresholds not exceeded for generator category?

Training and Documentation

- ☐ Are employees handling hazardous waste trained initially and annually (if SQG/LQG)?
- ☐ Is training documented with dates, topics, and attendance?
- ☐ Is there written training content or job-specific instructions?
- ☐ Are hazardous waste contingency plans up to date and accessible?
- ☐ Are emergency coordinator(s) designated in writing?
- ☐ Are inspection logs maintained?
- ☐ Are manifests, LDR notices, and shipping records kept for at least three years?

Emergency Preparedness and Prevention

- ☐ Are emergency phone numbers posted by phones or accessible to staff?
- ☐ Is aisle space adequate for emergency access?
- ☐ Are spill kits and cleanup materials readily available?
- ☐ Are fire extinguishers, alarms, and communication devices working and inspected?

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- ☐ Are emergency exits marked and unobstructed?
 - ☐ Are employees trained in spill response procedures?
 - ☐ Are arrangements made with local fire, police, and emergency response teams (SQG/LQG requirement)?
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Disposal and Transport

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- ☐ Are only properly permitted and licensed hazardous waste transporters used?
 - ☐ Are hazardous waste manifest forms completed correctly?
 - ☐ Is waste shipped to a permitted Treatment, Storage, or Disposal Facility (TSDF)?
 - ☐ Are Land Disposal Restriction (LDR) notifications prepared when required?
 - ☐ Are manifest returns (“signed copies”) tracked and discrepancies resolved?
 - ☐ Are used oil, universal waste, and e-waste managed according to their specific rules?
 - ☐ Are empty containers handled according to EPA empty-container rules?
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Use this checklist regularly to stay in compliance and avoid costly penalties.

If you're unsure about any of these requirements, or if you need assistance with lab packs, chemical disposal, waste categorization, or compliance consulting, Maine Labpack is here to help. Our team specializes in guiding laboratories, schools, hospitals, and manufacturers through the entire hazardous waste management process—from identification and packaging to transport and final disposal.

By working with Maine Labpack, you can reduce risks, simplify compliance, and focus on what you do best while we handle the complexities of hazardous waste management.