



Documenting Hazardous Waste Container Inspections

Environmental Concerns

To prevent or minimize releases of hazardous waste and resulting clean-up costs, Minnesota Hazardous Waste rules require all generators of hazardous waste to inspect storage containers and storage areas **every week** and to keep an inspection log.

Making Inspections Easier

Here are some initial steps you can take that will make inspections easier:

- Place the waste in a compatible container to prevent spills or leaks.
- Before moving a container to the storage area, make sure the container is closed, marked properly, and has the correct hazard labels affixed (corrosive, flammable, etc.). If you use the yellow and red hazardous waste label used to satisfy Department of Transportation marking requirements, check to see if it is filled out completely and correctly.
- Make sure the floor in the storage area is impermeable to any liquid waste stored on it. (A sealed concrete floor is often used.)
- If the storage area is indoors, make sure leaking waste cannot enter floor drains.
- If the storage area is outdoors, the floor must also be curbed to contain leaks and prevent them from spilling onto the ground.
- When placing containers in the storage area, position them so that labels are easily visible. Leave enough space between containers to check for leaks and to remove containers if leaks are discovered.
- Stacking 55-gallon drums two-high is allowed if they are secure and can still be easily inspected and removed if they leak. Stacking 55-gallon drums three-high is strongly discouraged.
- Train* the personnel doing the inspections to ensure they are familiar with labeling, marking, and storage rules. You will need to document the training.
 - *Training is required for small and large quantity generators and strongly recommended for very small quantity generators.

Satellite Accumulation

For satellite-accumulation drums, the date the drum is **filled** is the *accumulation start date*. The 90- or 180-day storage time clock starts on this date. Move satellite accumulation drums to a permanent storage area within three days of the fill date.

Satellite-accumulation containers that are under direct control of an operator and are visually inspected daily by that operator do not need documented weekly inspections during waste accumulation. Satellite accumulation containers that are located away from the operator during waste accumulation, or that have been filled and moved into the permanent storage area must be inspected weekly. These inspections must be documented.

Weekly Inspections – What to Look For

When doing a weekly inspection, MPCA and Anoka County staff recommend each business check the following for each storage container and storage area:

1. Are all the containers closed?
2. Do the containers have the necessary hazard labels?
3. If yellow hazardous waste labels are used to satisfy marking requirements, are they visible and filled out completely?
4. Do the dates on the drums indicate they are within the storage time limits for your generator size?
5. Is the amount of waste stored within the accumulation limits for your generator size?
6. Are there any leaks or spills?
7. Are there any cracks in the floor of the storage area?
8. If the storage area is outdoors, is the area secure?
9. If the storage area is outdoors, are ignitable wastes shaded?

Make note of:

- The date of inspection
- Any issues that were found
- What was done to correct each issue
- The date each issue was corrected
- Who corrected the issue?

The employee performing the inspection must sign or initial the entry. Keep these inspection records for a minimum of **three years**.

There is no special form you must use to document inspections. You may use a calendar designated for container inspections or you may use a log sheet such as the one attached. You may copy the attached log sheet for your own use or use it as an aid when designing one of your own. NOTE: If you create your own inspection log, the log must include a checklist, the date of inspection (including the year), and initials or signature of the individual conducting the inspection.

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