

**40 CFR §262.34(a)(1)(i), which incorporates §265.174,
“Weekly Inspection of Containers by Large Quantity Generators”**
[which is incorporated into §391-3-11-.08(1) of the Georgia
Rules for Hazardous Waste Management by reference]

§262.34(a)(1)(i) states, the following:

- (a) Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:
- (1) The waste is placed:
- (i) In containers and the generator complies with the applicable requirements of subparts I [“Use and Management of Containers,” which includes Condition of containers, Compatibility of waste with container, Management of containers, Inspections, Special Requirements for ignitable or reactive waste, Special requirements for incompatible wastes], AA [“Air Emission Standards for Process Vents”], BB [“Air Emission Standards for Equipment Leaks”], and CC [“Air Emission Standards for Tanks, Surface Impoundments, and Containers”] of 40 CFR Part 265;

Subpart I of Part 265 includes:

§265.174 Inspections. At least weekly, the owner or operator must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

Generators of hazardous waste that accumulate hazardous for 90 days or less must inspect areas where containers are stored to detect leaking containers or deterioration of containers. Records must be maintained that document that the required inspections have been conducted. A checklist of items/problems to look for should be drafted by the facility to use in documenting the inspections. Items/problems to look for should include, but are limited to, the following:

- Open containers
- Leaking containers
- Damaged or rusting containers
- Bulging containers
- Unlabeled or undated containers
- Use of containers that are not compatible with the waste contained therein
- Unstable/unsafe stacking of containers
- Storage of ignitable or reactive waste in containers within 50 feet of the facility’s property line
- Separation of incompatible waste and/or materials by a dike, berm, wall or other device

Suggestions to prevent violations of this rule include the following:

- Training of personnel involved in inspecting less than 90-day storage areas at the facility;
- Conducting weekly inspections on the same day of each week. However, if the person responsible for conducting the inspections is absent the day that the inspection is to be conducted, a designated alternate

inspector should perform the inspection, or the responsible person can conduct the inspection on an alternate day that week.

- An inspection schedule can be drafted to help the inspector remember which days the inspection is to be conducted. Send an e-mail to the inspector or put a note on a calendar/schedule reminding the inspector of when to conduct weekly inspections.
- The inspector should be a person trained in hazardous waste inspections, but it is recommended that the inspector be someone who does not directly work in the accumulation areas in order to keep a “fresh” perspective on conditions during inspections.