



**BCEIA**  
British Columbia  
Environment Industry Association



## **ASSESSING COMPLIANCE WITH THE BC HAZARDOUS WASTE REGULATION**

**A self-assessment guidance document for companies that handle, transport,  
manage and treat hazardous wastes in British Columbia**

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Prepared by the British Columbia Environment Industry Association as a General Guide  
Please refer to the Official Ministry of Environment Regulations for all regulatory guidance

**BCEIA**

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Environment Industry  
Association



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## INTRODUCTION

The British Columbia Environment Industry Association (BCEIA) is working with the British Columbia Ministry of Environment (MOE) to raise awareness and compliance with the BC Hazardous Waste Regulation (HWR).

BCEIA would like to thank the BC Ministry of Environment, Industrial Waste Section, for their valuable contributions to this Audit Assessment Protocol. This guide has been developed by the BCEIA Hazardous Waste Committee members.

This guide provides basic checklists to assist companies in assessing their overall degree of compliance with the HWR. In following the guide, all-relevant requirements of the HWR will be assessed, and results of the assessment will highlight where improvements, if any, need to be

made.

Assessment of the results will provide the company with an opportunity to deal with any deficiencies while providing heightened awareness of the HWR and how it relates to specific activities of their operations.

*This guide is intended as an information and guidance document only. The use of this guide does not in anyway assure compliance with the requirements of the British Columbia Environmental Management Act or the Hazardous Waste Regulations. The actual legislation and the British Columbia Ministry of the Environment should be consulted. The BCEIA is not responsible for any errors or omissions in the guide and does not in any way warrant that the use of the guide assures compliance with the requirements of the British Columbia Environmental Management Act or the Hazardous Waste Regulations.*

### ***Need More Information?***

Contact the nearest regional office of the BC Ministry of Environment. A list of regional offices can be found at <http://wlapwww.gov.bc.ca/regops/contacts.html>

Or you can find your nearest Ministry of the Environment office by phone.

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**Victoria: (250) 387-6121**

**Vancouver: (604) 660-2421**

**Elsewhere in BC: 1-800-663-7867**

**Outside BC: (604) 660-2421**

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There are links to the relevant legislation, as well as other helpful information on the BC Ministry of Environment's Hazardous Wastes Homepage, <http://www.env.gov.bc.ca/epd/hazwaste/index.htm>

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### APPENDIX A – GENERAL DESCRIPTION

(Insert basic information about the company activities in this Appendix)

### APPENDIX B – CHECKLISTS

Checklists (as listed above in Section 3)

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## METHODOLOGY

This Section of the guide provides basic instructions on how to use the guide to check if your business is being operated in compliance with the HWR. It describes how to select checklists applicable to your operations and provides general guidance on how to assess if you are operating in compliance, and it describes how results should be interpreted based on rankings of non-compliance findings.

The guide assumes that a company representative/employee with little to no assessment/audit experience will be the primary user. The assessment includes two main phases:

**The Assessment** – the person conducting the assessment will confirm the scope and objectives, review documentation, observe and assess physical structures or procedures, interview relevant personnel, and record their findings – both good and bad.

**Post Assessment** – the assessment results should be reviewed by the company managers. Review of the results should identify where non-compliance issues are arising as well as indicate areas of potential concern. The review should also provide an opportunity for management to acknowledge proactive or exceptional environmental management practices.

### 1.0 UNDERSTANDING REGULATORY REQUIREMENTS OF THE FACILITY OR OPERATION

The assessor should have a reasonable understanding of the facility/site operations. To best prepare for the assessment, prior to starting on any checklists, the assessor should first obtain and review all available regulatory instruments (licences, permits, approvals, authorizations etc.). Information to be gathered is outlined in the General Description Form attached as Appendix A.

From this review, the assessor should compile a basic list consisting of:

- Administrative requirements
- Performance monitoring and reporting requirements that can be checked during the assessment.
- Any specific authorized exemptions to the HWR. Some exempted requirements should remain best management practices (BMP's). Some wastes may be exempted; however weather protection, secondary containment, marking and labelling are still important factors to address for responsible storage of hazardous waste.

This information can be retained in Appendix A.

## 2.0 SELECTING ALL APPLICABLE CHECKLISTS

Before starting the assessment, it is important to know what checklists apply (Appendix B). Selection of all applicable checklists will improve the likelihood that all relevant HWR requirements will be addressed. Eliminating checklists that do not apply will save time while providing an emphasis on relevant material. Enter YES or NO in the final column of the table below – then, in your assessment, use only checklists with a YES response.

Consider all of the activities of the facility/operation and look through the following list to see which checklists might apply. If it is not clear what checklists apply, check the HWR definitions, e.g. for Mobile Facility, or Secure Building. Once identified, the checklists can be printed out and carried with the assessor. The person conducting the assessment should confirm all recent HWR amendments are reflected. The first checklist will always be applicable.

### Summary of Compliance,

### Available Checklists

Table of Checklists Checklist #	Checklist Contents	Applicable (Yes/No)
1	Summary of Compliance (Applies To All Operations/Facilities and is always applicable)	YES
2	Generator Requirements For Hazardous Wastes	
3	Carrier/Transporters Requirements For Hazardous Wastes	
4	Receiver/Management Facility Requirements	
	<b>Additional Requirements For Specified Facilities</b>	
5	Recycling Facility	
6	Storage Facility	
7	Treatment Facility	
8	Incinerators and Thermal Facilities	
9	Mobile Facilities	
10	Secure Landfills	
11	Waste Piles, Surface Impoundments and Land Treatment	
12	Disposal in Secure Building	
	<b>Specified Hazardous Wastes</b>	
13	Waste asbestos	
13	Waste oil	
13	Hydrocarbon contaminated soil	
13	Pest control product wastes and containers	
13	Waste paint	
13	Collection and Storage of household hazardous waste	
13	Requirements for establishment and operation of a return collection facility	

### 3.0 OBTAINING AND RECORDING INFORMATION

This Section of the guide provides general advice on how best to obtain representative information to support findings.

For each assessed item (checklist item) a finding (result) should be generated. Findings will be identified in the checklists by a checkmark in one of three columns labelled Y (Yes), N (No) and N/A (Not Applicable).

**Y (Yes)** = all aspects are satisfactory and meet the HWR and any operational conditions.

**N (No)** = one or more of the aspects (or portions) related to the HWR requirements are not met, or one or more of the reviewed items are not following requirements.

**N/A (not applicable)** = the item either does not apply in the circumstance, or there is an authorized written exemption from the HWR from the Ministry.

Assessment information or supporting rationale should be recorded in the checklists and kept in designated files. Information and rationale will often include photographs and copies of documents. Reasons for the findings should be indicated in the “comments / items to fix” area on the checklists.

Many of the checklist items are self-explanatory and can be readily addressed through a quick review of available documentation or through physical observation. References to the actual applicable section of the HWR are presented as a suffix to most checklist items (the HWR (last amended in April 2009) is available on [www.hazwastebc.com](http://www.hazwastebc.com) ).

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### 3.1 Summary of Compliance Checklist

The reader should refer to Checklist 1 in Appendix B.

This checklist contains important HWR requirements, most of which should be met by all companies who handle, manage, store, transport or treat HW.

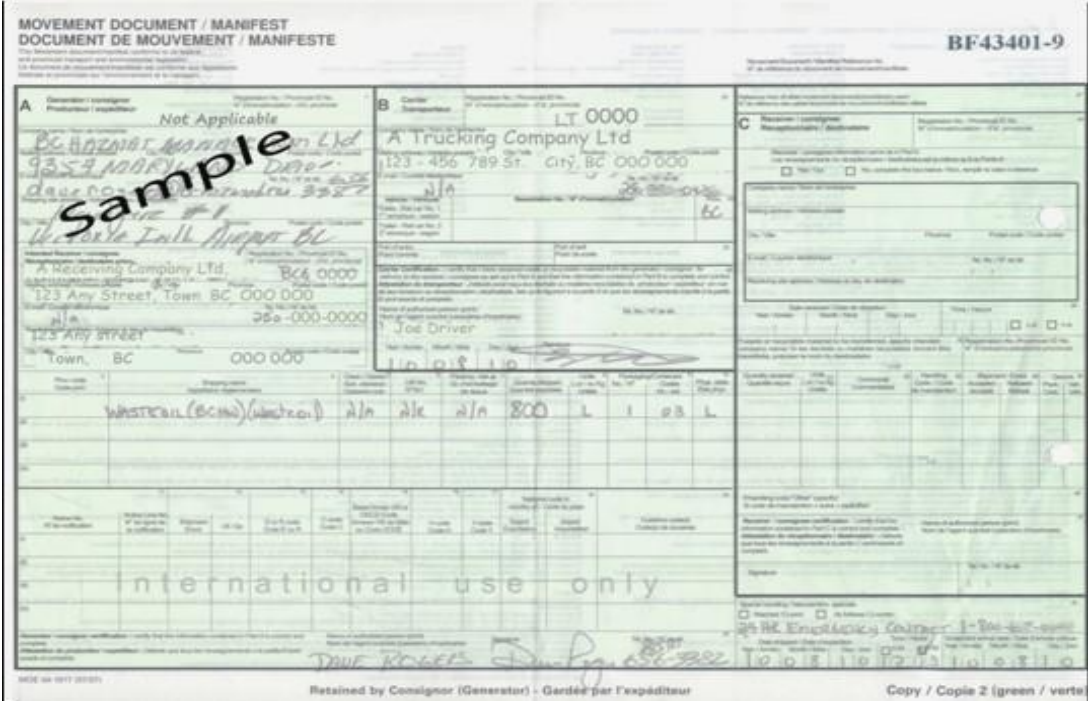
This checklist should be completed in draft form prior to completing the remaining checklists as it will indicate what types of information should be considered.

Many of the HWR requirements assessed here are addressed in further detail in the other applicable checklists. Once all applicable checklists have been completed, this checklist should be revisited and a final version should be made.

Checklist Item #	How to Obtain Information
1,2	Review all regulatory documents for completeness and applicability, and confirm that the business is operating in accordance with the stipulated conditions. Use information gained while completing all other checklists to make sure operating conditions are being met. Ask the operator if they are aware of any deviations from specified operating plans or requirements as this will save considerable time.
3	Interview the facility manager and other personnel to confirm that the hazards of the HW they are dealing with are well understood.
4	Take a quick look at available HW records to assess what records are being maintained. Confirm that records date back at least 2 years, and records indicate what has happened to the HW and/or show where it is located.
5	Review the general contents of shipping documents (i.e. manifests). Shipping document requirements are assessed in detail by reviewing representative samples per guidance in checklists 2, 3 and 4 and findings from those checklists should be incorporated for this item (i.e. complete this checklist item only after detailed review of shipping documents).
6 - 18	Conduct a quick tour of the facility and/or quickly review any site plans and procedures that show physical construction and operating practices. If unsure of a finding, wait until the end of the assessment as these items are addressed in other checklists.

### 3.2 Generator Checklist

Tour the facility, interview personnel, take photographs and check records. If possible, try to conduct the assessment on a day when an actual shipment of HW takes place.

Checklist Item #	How To Obtain Information
1 - 4	Ask if the generator knows what will be done with their waste (to confirm there is a contract between the receiver and generator). Ask for documentation of generator registration #s, and a registered site # if applicable, (observation).
5-14	<p>Ask what waste types have been removed from the facility, who picked them up, and where did they go. Ask to see documentation of the specific shipments in the form of shipping documents or invoices, for the second to last shipment reported sent out, and for a shipment sent out approximately 18 months previously (this enables assessment of the use of shipping documents and record keeping).</p> <p>Select representative shipping documents and review their contents to assess if they have been properly completed. For facilities with less than 20 shipping documents a year, review 5 (one randomly selected per quarter during the prior year, and one randomly selected from anytime 12 – 24 months prior). Obtain copies of select shipping documents (confirm the facility has both copy 2 and copy 6 for the same shipping document). For facilities with more than 20 shipping documents a year, review additional shipping documents, up to a maximum of 10.</p> <p>Copy 2, below:</p> 

Copy 6, below

**MOVEMENT DOCUMENT / MANIFEST**  
**DOCUMENT DE MOUVEMENT / MANIFESTE**

This Movement document/manifest conforms to all federal and provincial transport and environmental legislation.  
 Ce document de mouvement/manifeste est conforme aux législations fédérale et provinciale sur l'environnement et le transport.

Reference No. / N° de référence du document de mouvement/manifeste utilisé: **BF43401-9**

**A Generator / consigneur / Producteur / expéditeur**  
 Registration No. / Provincial ID No. / N° d'immatriculation - d'ID provincial: **Not Applicable**

**B Carrier / Transporteur**  
 Registration No. / Provincial ID No. / N° d'immatriculation - d'ID provincial: **LT 0000**

**C Receiver / consignee / Réceptionnaire / destinataire**  
 Registration No. / Provincial ID No. / N° d'immatriculation - d'ID provincial: **BC 000 000**

**Waste Description:**  
 Class / Classes / Sub-classes / Sous-classes: **Waste Oil (BCHW) (Used Oil)**  
 UN No. / N° UN: **N/A**  
 Packing / pkg. / Or d'emballage: **N/A**  
 Quantity shipped / Quantité expédiée: **800**  
 Units / Lit. ou Kg: **L**  
 Packaging/Container Code / N° / N°: **1 03 L**

**Quantity received / Quantité reçue:** **773 L**  
 Date received / Date de réception: **10/01/10**  
 Time / Heure: **15:45**

**Authorized Person:**  
 Name: **Joe Trucker**  
 Signature: *[Signature]*  
 Tel. No. / N° de tél.: **250 000 4000**

**Special Handling / Manutention spéciale:**  
 Attached C-ject  As follows C-coment

**Shipping Information:**  
 Vehicle / Véhicule: **Trailer - Rail car No. 1**  
 Registration No. / N° d'immatriculation: **66 0000**

**Shipping Address / Adresse postale:**  
 123 Any Street, Town, BC

**Receiver Address / Adresse de destination:**  
 123 Any Street, Town, BC

**Handing Code / Code de manutention:** **773 L**

**Comments / Commentaires:** **Mon 10/01/10**

**International use only / À usage international uniquement**

MOE 04-1917 (07/07)

Mailed by Consignee to Consignor - Postée par le destinataire à l'expéditeur

Copy / Copie 6 (brown / brun)

15



Ask if the generator checks the carrier's licences every time HW is picked up. If possible, observe if the Carrier's licence is checked. Record licence number.

16

Ask where the shipment is being sent to, then ask for a copy of that facilities' permit, approval, licence etc. Ask for documentation that the waste was disposed according to contract (e.g. certificate of destruction) in addition to receiving copy 6 of the shipping document. Confirm that information has been sought to verify facility compliance.



17-22

Find out if the generator sends out any multiple carrier shipments, or if they have sent out multiple different wastes at one time (special shipping document provisions will apply), Review 2 select shipping documents of this type from the previous 6 months if not already included in items 3, 4.

<p>23-29</p>	<p>Look at containers (observe condition) and ask what is stored inside them. Check labels and records for containers. <u>Take Photographs.</u></p> <div style="display: flex; justify-content: space-around;">   </div>
<p>30-34</p>	<p>Interview personnel (1 or 2 persons) working with HW and ask them what sort of training they have been given and when it was last given. Carefully check their actual records and briefly scan records for other employees who may work with HW.</p>



### 3.3 Carrier / Transporters Checklist

<p>Checklist Item #</p>	<p>How to obtain Information</p>
<p>1-4</p>	<p>Check that vehicles used for transporting HW are in the list for which the licence application was accepted.</p>
<p>5-11</p>	<p>Select random shipping documents from the past 2 years and follow their trails – confirm that applicable information has been written down and that the wastes being transported are those that the carrier is licensed for. Check part B of the shipping document (carrier fills out this portion) and any other supplement, and ensure portions are filled out correctly (helps to provide documentation of adequate training). For carriers with less than 20 HW shipments a year, review 5 (one randomly selected per quarter during the prior year, and one randomly selected from anytime 12 –24 months prior) - if more than one vehicle has been used, make sure shipping documents from more than one vehicle are reviewed. Obtain copies of select shipping documents. For carriers with more than 20 shipments a year, increase the number of representative shipping documents reviewed to a maximum of 10, making sure that multiple vehicles and multiple time periods are included.</p>

<p>12-13</p>	<p>Ask to see contingency plans for the shipment a driver is carrying and/or for the shipment he last carried. Check if the plans are suitable for the purpose. Confirm the presence of spill clean-up equipment and personal protective equipment in the vehicle (as specified in the Contingency Plan).</p> <p>Do the same for at least 3 randomly selected drivers/shipments.</p>
<p>14-22</p>	<p>Ask/assess if multiple consignment forms have been needed – check at least one shipping document to see if multiple consignment forms have been used as appropriate, the word “multiple” is included in part A of the shipping document, and a copy of the form has been attached to shipping documents.</p> <p>Ask/assess if multiple carrier forms or multiple different waste forms have been needed – obtain a random sample of each, if not already reviewed when selecting initial shipping documents to review.</p>
<p>23-26</p>	<p>Look at containers and ask if they are marked and labelled. <u>Take Photographs.</u></p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p><i>Properly marked and labelled.</i></p> </div> <div style="text-align: center;">  <p><i>Not marked and labelled.</i></p> </div> </div>
<p>27-31</p>	<p>Interview drivers (1 or 2 persons) working with HW and ask them what sort of training they have been given and when it was last given. Carefully check their actual records and briefly scan records for other employees who may work with HW.</p>

### 3.4 Receiver / Management Facility Checklist

Checklist Item #	How to obtain Information
1-2	Ask or look for information of authorization or approval to receive or manage HW. Check for a registered site # based on requirements. Check if the facility's permit, Letter of Authorization, or approved Operational Plan, matches the activity taking place.
3-4	Take a few containers of HW from the warehouse and backtrack their paper trail (shipping document, information of classification, facility's tracking system). Check shipping documents and ask for information of classification of HW.
5-15	Select random shipping documents from the past 2 years and follow the trail of the waste – make sure the applicable information has been written down. For receivers with less than 20 HW shipments a year, review 5 shipping documents (one randomly selected per quarter during the prior year, and one randomly selected from anytime 12 –24 months prior). If more than one HW type is received, make sure shipping documents from more than one HW type are reviewed. <u>Obtain copies of select shipping documents.</u> When more than 20 shipments are received a year, increase the number of representative shipping documents reviewed to a maximum of 10, making sure that multiple waste types and multiple time periods are included.

<p>16-19</p>	<p>Look at containers and ask if they are marked and labelled. Check condition of container and how it is stored. <u>Take Photographs.</u></p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p><b>Compliant storage</b></p> </div> <div style="text-align: center;">  <p><b>Non-compliant storage</b> (this picture was taken in a Municipal Public Works yard)</p> </div> </div>
<p>20-21</p>	<p>Assess general sitting conditions, information of an approved operational plan, and information of a contingency plan that addresses all HWR requirements. Check all additional requirements from the Ministry either in the facility's permit/authorization or approved operational plan.</p>
<p>22-26</p>	<p>Ensure that there is an emergency response coordinator and ask if he/she has an alternate. Ask the designate and the alternate if they can show you, and describe to you the contingency plan. Ask who else is an emergency response (ER) person – check to see if all ER people have proper PPE, and that clean up sorbents and equipment are at hand. Take photographs. Ask to see the closure plan (sec 14).</p>
<p>27</p>	<p>See what the workers are doing (focus on the worker, those that work at the ground level, not the management or administrative staff). Ask how they process certain types of waste and why, how they assess hazards of materials handled, and how they keep records of what they process. Check that the information they have is thorough. Do this for 2-3 material types if more than one type of HW is handled.</p>

**HAZARDOUS MATERIAL GENERAL STORAGE COMPATABILITY CHART**  
**TABLEAU DE COMPATIBILITÉ DE MATERIAUX DANGEREUX**

ANNEX B  
 TO CHAPTER 3 SECTION 1  
 TO A-LM-167-004U/S-001

<p><b>LEGEND</b></p> <p><b>C</b> = COMPATIBLE - MAY STORE TOGETHER</p> <p><b>C/D</b> = GENERALLY COMPATIBLE BUT CHECK HMGs</p> <p><b>S</b> = LESS HAZARDOUS INCOMPATIBLE ITEMS - SEPARATE BY A MINIMUM OF 1m HORIZONTAL DISTANCE</p> <p><b>S/D</b> = SEPARATE AND ALSO CHECK THE HMGs</p> <p><b>X</b> = INCOMPATIBLE - DO NOT STORE TOGETHER IN THE SAME ISAFIRE COMPARTMENT</p> <p>NOTE: RADIOACTIVE ITEMS REQUIRING LABELING ARE NOT TO BE STORED WITH ANY OTHER HAZARDOUS MATERIAL (SEE SECTION 9-15 OF THE NFCC)</p> <p>% = ALL DIVISIONS THIS CLASS</p>	<p><b>LEGENDE</b></p> <p><b>C</b> = COMPATIBLE - PEUT ÊTRE EMMAGASINER ENSEMBLE</p> <p><b>C/D</b> = GÉNÉRALEMENT COMPATIBLE MAIS VÉRIFIER LA FMD</p> <p><b>S</b> = DANGER MOINS HAZARDEUX - SÉPARER PAR UNE DISTANCE HORIZONTALE DE 1 MÈTRE</p> <p><b>S/D</b> = SÉPARER ET VÉRIFIER LA FMD</p> <p><b>X</b> = INCOMPATIBLE - NE PAS EMMAGASINER ENSEMBLE DANS LE MÊME MAGASIN OU COMPARTIMENT ÉTANCHE</p> <p>NOTA: LES ARTICLES RADIOACTIFS QUI NÉCESSITE L'ÉTIQUETAGE NE SONT PAS ÊTRE EMMAGASINER AVEC D'AUTRE MATERIAUX DANGEREUX (VOIR SECTION 9-15 DU DOCS NATIONAL DE PRÉVENTION DES INCENDIES DU CANADA)</p> <p>% = TOUTES DIVISIONS CETTE CLASSE</p>
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	FLAMMABLE GAS 2.1	NON-FLAMMABLE GAS 2.2	POISON GAS 2.3	CORROSIVE GAS 2.4	FLAMMABLE LIQUID 3	FLAMMABLE SOLID 4.1	SPONTANEOUSLY COMBUSTIBLE 4.2	DANGEROUS WHEN WET 4.3	OXIDIZER 5.1	ORGANIC PEROXIDE 5.2	POISON 6	RADIOACTIVE 7	CORROSIVE 8
FLAMMABLE GAS 2.1	=												
NON-FLAMMABLE GAS 2.2	C	=											
POISON GAS 2.3	X	C	=										
CORROSIVE GAS 2.4	X	C	S	=									
FLAMMABLE LIQUID 3	C	C	X	X	=								
FLAMMABLE SOLID 4.1	C	C	S	S	C	=							
SPONTANEOUSLY COMBUSTIBLE 4.2	S	C	S	S	S	S	=						
DANGEROUS WHEN WET 4.3	C/D	C	C/D	C/D	S	C/D	C/D	=					
OXIDIZER 5.1	X	C	S	S	X	X	X	X	=				
ORGANIC PEROXIDE 5.2	X	C	X	X	X	X	X	X	C	=			
POISON 6	X	C	C	C/D	C/D	C/D	C/D	C/D	S/D	S/D	=		
RADIOACTIVE 7	X (1)	X (1)	X (1)	X (1)	X (1)	X (1)	X (1)	X (1)	X (1)	X (1)	X (1)	=	
CORROSIVE 8	X	C	S	S	S	S	S	X	X	X	S	X (1)	=

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28-31	<p>Confirm how they check validity of waste type and amount of HW on receipt. If possible observe a shipment being delivered and observe how documentation is checked. Ask to see records of measurements for loads over 100L or 100kg.</p> <p>Ask if they recall anytime when a shipping weight/volume has not matched a shipping document and ask them to explain what they did (assess if they followed HWR protocols re 5% greater or less – ask to see reports of discrepancies).</p>
32-33	Check records of HW received, stored, or shipped.
34-39	Physically inspect. Take photographs. Take measurements.

40-44	Check records. Records may include internal audits, assessments, internal site inspections (weekly, monthly etc.), tank monitoring, analytical results from discharges and emissions, analytical results from monitoring programs, contingency plan updates, training or other.
45-48	Get the name of 1 or 2 people you observe working with HW. Interview them and ask them what sort of training they have been given and when it was last given. Carefully check their actual records, and briefly scan records for several other employees who may work with HW.
49-52	Find chemicals on site and select 2 or 3 and verify that MSDS are used and WHMIS training/signage is employed.
57	Confirm administrative and performance-monitoring requirements are met through record checking and, as appropriate, by observing physical equipment and/or procedures employed. (This is a check of facility-specific operating permit requirements etc).

### 3.5 Recyclers Checklist

Checklist Item #	How to obtain Information
1 - 3	Ask for a brief overview of how HW is handled. <u>Observe and photograph.</u>

### 3.6 Storage and PCBs Checklist

Checklist Item #	How to obtain Information
1-20	Ask for a brief overview of how HW is stored and managed. Observe and photograph. Check laboratory data for effluent and/or emissions to verify compliance with permit terms. Check that equipment is maintained (is control and measurement equipment reliable and calibrated).
21	Check monitoring and reporting requirements have been fulfilled per specific regulatory requirements.

Note: Federal PCB regulations (updated Sept. 2008) should be considered; in some cases these take precedence over and are more stringent than the HWR.

### 3.7 Treatment Facilities Checklist

Checklist Item #	How to obtain Information
1- 4	Ask for a brief overview of how HW is stored and managed. Observe and photograph. Check laboratory data for effluent and/or emissions to verify compliance with permit terms. Check that equipment is maintained (is control and measurement equipment reliable and calibrated).
5	Find out how residues are managed. Photograph, record information. Check for any exemptions.
6	Check Records.

### 3.8 Incinerators and Thermal Facilities Checklist

Checklist Item #	How to obtain Information
1-8	Ask for a brief overview of how HW is treated and emissions are controlled. Observe and photograph. Check what the operating approvals /conditions stipulate. Ask how inspections are conducted – check records of inspections. Look for records that prove continuous measurements and recordings are made and confirm there are no gaps in data. Check that equipment is maintained (is control and measurement equipment reliable and calibrated). Check records for monitoring and measuring and reporting per approvals/permits/operational plans.

### 3.9 Mobile Facilities Checklist

Checklist Item #	How to obtain Information
1-3	<p>Ask the chief operator to describe their procedures before leaving one site and when setting up at a new site. (Assess if these procedures include that equipment is drained and purged prior to leaving and that an emergency system test is done before start up).</p> <p>Check records for monitoring and measuring and reporting per approvals/permits/operational plans.</p>

**3.10 Secure Landfills Checklist**

Checklist Item #	How to obtain Information
1-18	<p>The assessor should review authorized operational conditions and performance reporting/monitoring stipulations. During a site tour, the assessor should take photographs and ask questions about how the facility is operated.</p> <p>General information on groundwater protection and dust control should be obtained. Drainage controls should be observed and compared to stipulated requirements. Waste records should be readily available and easy to access.</p> <p>Landfill operator should know what to do in the event of non-compliance data being encountered. Ask them (manager and/or others) what they would do in that situation. Check records for monitoring and measuring and reporting per approvals/permits/operational plans.</p>

**3.11 Waste Piles, Surface Impoundments, Land Treatment Checklist**

Checklist Item #	How to obtain Information
1-27	<p>Check re waste pile OR surface impoundment OR Land treatment - see specific requirements. The assessor should review authorized operational conditions and performance reporting/monitoring stipulations. During a site tour the assessor should take photographs and ask questions about how the facility is operated and how sampling is conducted.</p> <p>General information on groundwater protection and dust control should be obtained. Drainage controls should be observed and compared to stipulated requirements. Waste records should be readily available and easily accessed.</p> <p>Ask to see up gradient and down gradient wells. Operator should be asked what to do in the event of non-compliance data being encountered. Operator should also know what they are and are not allowed to accept.</p> <p>Check records for monitoring and measuring and reporting per approvals/permits/operational plans.</p>

### 3.12 Disposal in a Secure Building Checklist

Checklist Item #	How to obtain Information
2	Obtain information of weekly inspections. Ask if there have been any significant issues or emergency events (check if inspections were conducted). Find out how long it has taken to make repairs to major facility components (judge if repairs could have been made sooner).
3,5	Have the facility operator, and/or sampling personnel, describe the sampling program – check for consistency with stipulated requirements. Ask to see up gradient and down gradient wells. If non-compliance data has been recorded, check that it has been reported to MoE.
4	Accurate, up-to-date waste records are available. Check this.
6-12	Does operator know what is allowed to be stored – ask what can and cannot be stored. Confirm that effluent from the facility is monitored and reported on per operating conditions.

### 3.13 Management of Specific Hazardous Wastes Checklist

When assessing compliance with the HWR for waste asbestos, waste oil, and other hazardous wastes, the operators of the facility and any employees should be able to describe how they manage the HW. Assess whether or not all employees' responses match, and, if not, ask for information as to what procedures are being followed. Confirm that these procedures conform to the requirements of Part 6 of the HWR as they relate to your facility.

**Note: The waste-specific management practices in Part 6 of the HWR provide for certain exemptions from the normal requirements of the Regulation, but only if all the requirements in Part 6 for managing that waste are complied with. If there is non-compliance with any of the Part 6 requirements, the exemptions would not apply, and accordingly, the management of the waste would be subject to the full requirements of the HWR.**

Many of the HWR requirements for these specific HW types can be observed first hand at the facility.

## 4.0 DOCUMENTATION AND RANKING FINDINGS

### 4.1 Documentation

Document your assessment findings in a clear, concise and brief manner.

Documentation should include assessment findings and recommendations using the “Summary of Compliance” checklist.

Each of the key findings should be ranked per the findings classification described in the following paragraphs. A brief and general discussion of findings, per checklist, should also be provided. The discussion should indicate overall performance with respect to each applicable area of the HWR. Copies of all completed checklists should also be maintained.

### 4.2 Ranking of Findings

When a “No” finding is recorded (i.e. indicative of non-compliance with the HWR requirements, or of specified operating requirements), a corresponding ranking of the finding should be assigned according to the following table:

Ranking	Definition
1	A <i>No</i> finding. A minor administrative requirement not followed, or a minor requirement not followed that does not result, or is unlikely to result in any environmental, human health or safety impact. An item that, if rectified, would demonstrate a proactive approach to environmental management and pollution prevention.
2	A <i>No</i> finding. Administrative requirement not followed that is often identified or encountered (e.g. >10% of cases) – or – a requirement not followed that results in a minor, temporary impact to the environment or that poses a minor, temporary threat to human health or safety
3	A <i>No</i> finding. Administrative requirement not followed that is significant, or an administrative requirement not followed that is repeatedly identified or encountered (e.g. > 30% of cases) – or – a requirement not followed that results in a moderate, temporary impact to the environment or poses a moderate temporary threat to human health or safety.
4	A <i>No</i> finding. A requirement not followed resulting in a significant impact to the environment, or that poses a significant threat to human health or safety (may be temporary or permanent).
5	A <i>No</i> finding. A blatant non-following or requirement of the HWR (e.g. known mixing or dilution of HW, discharge or deposition of HW without a permit). A requirement not followed that results in known or likely severe human health impacts. A requirement not followed that poses a catastrophic threat to the environment and human health or safety.

## APPENDIX A General Description

See EXCEL BCEIA HWR Audit Protocol APPENDIX A January 2011

NEED MORE INFORMATION OR ASSISTANCE?

DOWNLOAD THESE **HAZARDOUS WASTE FACTSHEETS** AT [www.hazwastebc.com](http://www.hazwastebc.com)

Hazwastebc factsheets are a series of informative and easy-to-read educational tools published by the British Columbia Environment Industry Association (BCEIA) as a means to engage British Columbians and improve regulatory compliance under the province's Hazardous Waste Regulations (HWR).

Educators, employees, employers and decision-makers from across BC's hazardous waste management community are encouraged to preview, select and download for free distribution, as many hazwastebc factsheets as required.

If you need more information contact the British Columbia Environment Industry Association via [info@bceia.com](mailto:info@bceia.com), and one of our professional advisors will assist you.

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## **APPENDIX B**

### **Checklists**

**See EXCEL BCEIA HWR Audit Protocol APPENDIX B January 2011**

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