

ATTACHMENT 8 – NOAA ENVIRONMENTAL ASSESSMENT CHECKLIST
Version 3 –September 2002

Facility Name: _____ **Date:** _____
Address: _____ **City:** _____ **ST:** _____ **Zip:** _____
POC: _____ **Email:** _____
Phone: _____ **Fax:** _____ **Team Letter:** _____

PROTOCOL	Y	N	NA
ABOVEGROUND STORAGE TANK			
Do all bulk aboveground storage tanks (capacity of 600 gallons or greater) have secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation? (ST.5.1.TEAM)			
Are diked areas impervious enough to contain spilled POL? (ST.5.1.TEAM)			
Is the secondary containment area free of cracks, erosion, animal burrows, and vegetation growth? (ST.5.1.TEAM)			
Are valves kept closed when not in use? (ST.5.1.TEAM)			
Are periodic leak tests conducted? (ST.5.4.TEAM)			
Is a written log kept of the leak testing? (ST.5.4.TEAM)			
ENVIRONMENTAL DOCUMENTATION. Does the facility maintain any of the following environmental documents?			
SPCC Plan (PO.5.2.TEAM; See SPCC Plan questionnaire for requirements)			
Hazardous materials inventory? (HM.30.1.TEAM, HM.30.2.TEAM)			
Does the facility have records of pesticides being applied at their facility? (state callout)			
If facility personnel are performing the application, is there a copy of the applicator certification for review? (state callout, PM.5.1.TEAM)			
Does the facility have any air emissions permits (A.1.2.TEAM)? Date(s) of permit(s)? Is there any special permit monitoring requirements? Do monitoring records indicate compliance?			
If asbestos is present, does the facility have an Asbestos Operation and Maintenance Plan? (check state callouts)			
If lead-based paint (LBP) is present, does the facility have a LBP Management Plan? (check state callouts and T4.10.1 and .2.TEAM)			
UST and AST permits (See state specific regulations and Storage Tank questionnaire for requirements)			
NPDES and wastewater discharge permits (WA.10.1.TEAM and WA.10.2.TEAM)			
If the facility treats its own drinking water, are there monitoring records? Do monitoring records indicate compliance? (check state/local callouts and WQ.15.1 through .3.TEAM)			
Hazardous waste USEPA identification number (HW.20.2.TEAM and HW.55.2.TEAM)			
Hazardous waste manifests (HW.20.4.TEAM and HW.55.5.TEAM; See Hazardous Waste questionnaire for requirements)			
Installation environmental SOPs/correspondence?			
Other local, state, or Federal environmental regulations?			

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HAZARDOUS WASTE MANAGEMENT			
GENERAL			
Does the facility have any ongoing or unresolved consent orders, compliance agreements, notices of violation, interagency agreements, or equivalent enforcement actions pertaining to hazardous waste management? (HW.1.1.TEAM)			
Does the facility determine if generated wastes, including the following, are hazardous and handle them accordingly? (HW.10.1.TEAM)			
<ul style="list-style-type: none"> • Oily Rags • Rags contaminated with solvents..... • Waste solvents/tank filters..... • Fluorescent light bulbs..... • Antifreeze..... • Paint-related waste..... • Oil filters (terne coating)..... • Fuel filters..... • Solvent tank filters..... • Lead acid batteries..... • Alkaline batteries..... • Cadmium, NiCd, lithium, or magnesium batteries..... • Mixed waste fuels..... • Waste oil..... • Aerosol cans..... • Oil/water separator sludge..... • Contaminated/Used floor dry/absorbent..... • Photo lab waste..... • Excess hazardous materials when declared a waste..... 			
Does the facility have a designated individual responsible for the hazardous waste storage area and is he/she aware of his/her responsibilities? (HW.1.2.TEAM)			
Do facilities transporting hazardous waste meet the following requirements? (HW.100.1.TEAM through HW.100.5.TEAM)			
<ul style="list-style-type: none"> • USEPA transporter identification number • Transport hazardous waste to an USEPA approved facility • Personnel trained to transport hazardous waste • Have established procedures for transporting hazardous waste and maintaining required records 			
Does the facility have a permit to operate as a TSDF and does it operate within the permit requirements? (HW.105.1.TEAM)			
CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR			
Facility produces less than 100 kilograms (220 pounds) of hazardous waste or 1 kilogram (2.2 pounds) or less of acutely hazardous waste per month. (HW.15.1.TEAM)			

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Do facility personnel have training in hazardous waste handling and management with annual update? (HW.10.2.)			
Does the facility maintain up to date hazardous waste management records, including the following? <ul style="list-style-type: none"> • Training records (retain for 3 years) (HW.15.3.TEAM) • Installation environmental SOPs/correspondence 			
Does the facility handle containers previously holding hazardous waste as hazardous waste until they are RCRA empty? (HW.15.4.TEAM)			
Does the facility have a designated hazardous waste storage area (HW.15.6.TEAM) and is it properly managed, including the following? <ul style="list-style-type: none"> • Adequate isle spacing (30 in.) (HW.15.5.TEAM) • Stacking not exceeding 2 drums in height (HW.15.5.TEAM) 			
Does the facility offer hazardous waste to transporters or TSDFs not having an USEPA identification number? (HW.15.1.TEAM)			
SMALL QUANTITY GENERATOR			
Facility produces between 1,000 kilograms (2205 pounds) and 100 kilograms (220 pounds) of hazardous waste or 1 kilogram (2.2 pounds) or less of acutely hazardous waste per month. (HW.20.1.TEAM)			
Do facility personnel have training in hazardous waste handling and management with annual update? (HW.25.1.TEAM)			
Does the facility maintain up to date hazardous waste management records, including the following? <ul style="list-style-type: none"> • Training records (retain for 3 years) (HW.25.2.TEAM) • Manifests (retain for 3 years) (HW.20.4.TEAM) • Emergency/Contingency plan (HW.20.5.TEAM) • Inspection logs (HW.40.3) • Installation environmental SOPs/correspondence 			
Does the facility have an USEPA identification number? (HW.20.2.TEAM)			
Is the onsite accumulation time of hazardous waste less than 180 days (or 270 days if waste is transported greater than 200 miles to a TSDF)? (HW.20.1.TEAM)			
Does the facility accumulate greater than 6,000 kilograms (13,227.73 pounds) of waste on site? (HW.20.1.TEAM)			
Does the facility have an emergency response plan and coordinator, with the following information posted adjacent to the telephone? (HW.20.5.TEAM) <ul style="list-style-type: none"> • Name and telephone number of emergency coordinator • Location of fire extinguishers and spill control materials • Location of fire alarms (if present) • Telephone number of the fire department 			
Does the facility handle containers previously holding hazardous waste as hazardous waste until they are RCRA empty? (HW.30.1.TEAM)			
Does the facility maintain satellite accumulation points meeting the			

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<p>following requirements?</p> <ul style="list-style-type: none"> • Up to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste (HW.35.1.TEAM) • At or near the point of generation (HW.35.1.TEAM) • Containers are in good condition and closed when not adding or removing waste (HW.35.1.TEAM) • Containers are labeled as HAZARDOUS WASTE or with other words identifying the contents (HW.35.1.TEAM) • Containers securely closed (HW.30.4.TEAM) 			
<p>Does the hazardous waste storage area meet the following requirements?</p> <ul style="list-style-type: none"> • Containers in good condition and not leaking (HW.30.2.TEAM) • Containers properly labeled (HW.20.1.TEAM) • Containers securely closed (HW.30.4.TEAM) • Adequate aisle spacing (HW.40.2.TEAM) • Stacking not exceeding 2 drums in height (HW.30.6.TEAM) • Internal communication or alarm system (HW.40.2.TEAM) • Telephone or two-way radio (HW.40.2.TEAM) • Fire extinguisher and special extinguishing equipment (HW.40.2.TEAM) • Spill control equipment (HW.40.2.TEAM) • Decontamination equipment (HW.40.2.TEAM) • Fire hydrants or other sources of water of adequate volume and pressure, foam producing equipment, automatic sprinklers or water spray systems (HW.40.2.TEAM). 			
<p>Does the facility conduct weekly inspections of the container storage area and maintain verification records? (HW.40.3.TEAM)</p>			
<p>Does the facility keep records of hazardous waste activity for 3 years, including the following? (HW.20.4.TEAM)</p> <ul style="list-style-type: none"> • Manifests • Exception reports • Test results, waste analysis, and determination 			
<p>Does the facility offer hazardous waste to transporters or TSDFs not having an USEPA identification number? (HW.20.3.TEAM)</p>			
<p>Does the facility utilize manifests containing the following information? (HW.20.4.TEAM)</p> <ul style="list-style-type: none"> • Generator mailing address, phone number, and USEPA identification number • Transporter name and USEPA identification number • TSDF site address and USEPA identification number • Signed and dated by generator, transporter, and TSDF • Quantity and type of hazardous waste transported • Returned copy • Land ban form 			

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PROTOCOL	Y	N	NA
LARGE QUANTITY GENERATOR			
Facility produces 1,000 kilograms (2205 pounds) or greater of hazardous waste or 1 kilogram (2.2 pounds) or greater of acutely hazardous waste per month. (HW.55.1.TEAM)			
Do facility personnel have training in hazardous waste handling and management with annual update? (HW.60.1.TEAM)			
Does the facility maintain up to date hazardous waste management records, including the following? <ul style="list-style-type: none"> • Training records (retain for 3 years) (HW.60.2.TEAM for LQGs) • Manifests (retain for 3 years) (HW.55.5.TEAM\) • Emergency/Contingency plan (\ HW.65.1.TEAM) • Inspection logs (HW.80.3.TEAM for LQGs) • Installation environmental SOPs/correspondence 			
Does the facility have an USEPA identification number? (HW.55.2.TEAM)			
Is the onsite accumulation time of hazardous waste less than 90? (HW.55.1.TEAM)			
Does the facility submit a biennial report to the regional administrator by March 1 of even numbered years? And are copies retained for 3 years? (HW.55.4.TEAM)			
Does the facility have a contingency plan and emergency coordinator? (HW.65.1.TEAM and HW.65.2.TEAM)			
Does the facility handle containers previously holding hazardous waste as hazardous waste until they are RCRA empty? (HW.70.1.TEAM)			
Does the facility maintain satellite accumulation points meeting the following requirements? (HW.75.1.TEAM) <ul style="list-style-type: none"> • Up to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste (HW.75.1.TEAM) • At or near the point of generation (HW.75.1.TEAM) • Containers are in good condition and closed when not adding or removing waste (HW.75.1.TEAM) • Containers in good condition and not leaking (HW.70.2.TEAM) • Wastes compatibly stored (HW.70.5.TEAM) • Containers are labeled as HAZARDOUS WASTE or with other words identifying the contents (HW.75.1.TEAM) 			
Does the hazardous waste storage area meet the following requirements? <ul style="list-style-type: none"> • Containers in good condition and not leaking (HW.70.2.TEAM) • Containers properly labeled (HW.55.1.TEAM) • Containers securely closed (HW.70.4.TEAM) • Wastes compatibly stored (HW.70.5.TEAM) • Adequate isle spacing (HW.80.4.TEAM) • Stacking not exceeding 2 drums in height (HW.70.6.TEAM) • Internal communication or alarm system (HW.80.4.TEAM) • Telephone or two-way radio (HW.80.4.TEAM) 			

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PROTOCOL	Y	N	NA
<ul style="list-style-type: none"> • Fire extinguisher and special extinguishing equipment (HW.80.4.TEAM) • Spill control equipment (HW.80.4.TEAM) • Decontamination equipment (HW.80.4.TEAM) • Fire hydrants or other sources of water of adequate volume and pressure, foam producing equipment, automatic sprinklers or water spray systems (HW.80.4.TEAM) 			
Does the facility have a written plan and schedule for container inspection and monitoring requirements? (HW.70.10.TEAM)			
Does the facility conduct weekly inspections of the container storage area and maintain verification records? (HW.80.3.TEAM)			
Does the facility keep records of hazardous waste activity for 3 years, including the following? (HW.55.5.TEAM and HW.55.6.TEAM) <ul style="list-style-type: none"> • Manifests • Exception reports • Test results, waste analysis, and determination 			
Does the facility offer hazardous waste to transporters or TSDFs not having an USEPA identification number? (HW.55.3.TEAM)			
Does the facility utilize manifests containing the following information? (HW.55.5.TEAM) <ul style="list-style-type: none"> • Generator mailing address, phone number, and USEPA identification number • Transporter name and USEPA identification number • TSDF site address and USEPA identification number • Signed and dated by generator, transporter, and TSDF • Quantity and type of hazardous waste transported • Returned copy • Land ban form 			
SPILL PREVENTION CONTROL AND COUNTERMEASURES (SPCC) PLAN			
Does the facility store, transport, or dispense petroleum (POL) products? If yes, do the quantities and/or capacities (including mobile storage tanks) of POL exceed: <p>A. 42,000 gallons of underground buried storage capacity?</p> <p>B. 1,320 gallons of total aboveground storage capacity?</p> <p>C. A release can reasonably expected to reach US navigable water?</p> <p>If yes to "A and C" or "B and C", a Federally required SPCC Plan is necessary. (PO.5.1.TEAM). Otherwise, an SPCC plan is not required.</p>			
Does the Federally required SPCC Plan meet the following? <ul style="list-style-type: none"> • It is present at the facility (or at the nearest manned facility if personnel are not on site for 8 hours per day)? (PO.5.6.TEAM) • Is the SPCC Plan amended within 6 months of any material change in the facility design, construction, operations, or maintenance that alters the 			

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PROTOCOL	Y	N	NA
<p>potential for an oil spill? (PO.5.4.TEAM)</p> <ul style="list-style-type: none"> • It is reviewed at least once every five years or when there is a significant discharge of oil (PO.5.3.TEAM and PO.5.4.TEAM) • The SPCC Plan is certified? (PO.5.5.TEAM) • It contains general information about the facility, including: (PO.5.2.TEAM) <ul style="list-style-type: none"> – Name, type of function, location of drainage patterns, location maps; – Name and title of designated coordinator; – Inventory of all storage, handling, and transfer facilities that could produce a significant spill, including predictions of direction and rate of flow and total quantities of POL that could be spilled as a result of a major failure. • It has the Designated Responsible Official (DRO) approval (including a signature page for review and concurrence when a change in DRO takes place); (PO.5.2.TEAM) • It contains specific information on: (PO.5.2.TEAM) <ul style="list-style-type: none"> – Spill reporting procedures; – Pre-spill planning for major potential spill areas; – Spill containment and cleanup equipment/facilities (including locations); – Training procedures; – Spill response exercises; – Plan review and update procedures; – Security measures; – Inspection procedures; – Tank integrity testing procedures. 			
UNIVERSAL WASTE			
Does the facility handle universal waste (batteries, pesticides, and other state designated wastes)?			
Does the facility dispose of universal waste on site? (HW.280.1.TEAM)			
Is universal waste accumulated for more than one year from the date the waste is generated or received from another generator? (HW.280.2.TEAM)			
Are accumulation start dates documented? (HW.280.2.TEAM)			
Are batteries that show evidence of leakage, spillage, or damage that could cause leakage contained in a container? (HW.290.1.TEAM)			
Are the containers of universal waste closed, compatible with their contents, and generally in good condition? (HW.290.1.TEAM, HW.290.3.TEAM, HW.290.4.TEAM)			
Are containers of universal waste adequately labeled? (HW.310.1.TEAM)			
Have employees been trained in the proper handling and emergency response procedures? (HW.300.1.TEAM)			
Does the facility send or take universal waste to anyplace other than another universal waste handler or a destination facility? (HW.330.1.TEAM)			
Has the universal waste being offered for offsite shipment been characterized to			

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PROTOCOL	Y	N	NA
determine if it is a hazardous waste? (HW.10.1.TEAM)			
UNDERGROUND STORAGE TANK			
For USTs installed after December 22, 1998:			
Does the UST have leak detection that: (ST.60.1.TEAM) <ul style="list-style-type: none"> • Can detect a leak from any portion of the tank or its piping that routinely contains petroleum? • Is installed, calibrated, operated, and maintained in accordance with the manufacturer's instructions? 			
Is monthly monitoring conducted using one of the following methods: (ST.65.1.TEAM) <ul style="list-style-type: none"> • Interstitial monitoring? • Automatic tank gauging? • Monitoring for vapors in the soil? • Monitoring for liquids on the groundwater? • Statistical inventory reconciliation? • Other methods approved by the regulatory authority? 			
Is the temporary method of inventory control (i.e. daily measurements of tank contents and recording deliveries and amount pumped) combined with tank tightness testing (conducted every five years) being used? (ST.65.1.TEAM)			
For USTs with a capacity of 1,000 gallons or less, is manual tank gauging used as a leak detection method? (ST.65.1.TEAM)			
For USTs with a capacity of between 2,000-1,001 gallons, is manual tank gauging used in conjunction with tank tightness testing as a leak detection method? (ST.65.1.TEAM)			
Does the UST receive more than 25 gallons of liquid at a time? If yes, does the UST have a catchment basin/spill protection? (ST.35.1.TEAM)			
Does the UST have overfill protection consisting of one of the following: (ST.35.1.TEAM) <ul style="list-style-type: none"> • An automatic shutoff device? • An overfill alarm? • A ball float valve? 			
Does the UST match one of the following: (ST.35.3.TEAM) <ul style="list-style-type: none"> • Tank and piping completely made of non-corrodible material, such as fiberglass? • Tank and piping made of steel having a corrosion-resistant coating and having cathodic protection? • Tank made of steel clad with a thick layer of non-corrodible material? 			
If the tank contains a non-POL substance, does the UST have secondary containment consisting of one of the following: (ST.70.2.TEAM) <ul style="list-style-type: none"> • Double-walled tanks? • A concrete vault surrounding the UST? • A liner around the UST liner that cannot be penetrated by the hazardous substance? 			

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PROTOCOL	Y	N	NA
If the tank contains a non-POL substance, does the UST have interstitial monitoring able to indicate the presence of a leak in the confined space between the first and second wall of the UST system? (ST.70.2.TEAM)			
Does the UST have pressurized piping? If yes, does the piping have devices that automatically shut off or restrict flow or have an alarm that indicates a leak? (ST.70.1.TEAM)			
Is either annual tightness testing of the piping conducted or is one of the following monthly methods used: (ST.65.1.TEAM) <ul style="list-style-type: none"> • Interstitial monitoring? • Vapor monitoring? • Groundwater monitoring? • Statistical inventory reconciliation? • Other approved methods? 			
For USTs installed before December 22, 1988			
Does the UST have leak detection that: (ST.60.1.TEAM) <ul style="list-style-type: none"> • Can detect a leak from any portion of the tank or its piping that routinely contains petroleum? • Is installed, calibrated, operated, and maintained in accordance with the manufacturer's instructions? 			
Is monthly monitoring conducted using one of the following methods: (ST.65.1.TEAM) <ul style="list-style-type: none"> • Interstitial monitoring? • Automatic tank gauging? • Monitoring for vapors in the soil? • Monitoring for liquids on the groundwater? • Statistical inventory reconciliation? • Other methods approved by the regulatory authority? 			
Is the temporary method of inventory control (i.e. daily measurements of tank contents and recording deliveries and amount pumped) combined with tank tightness testing (conducted every five years) being used? (ST.65.1.TEAM) Has it been used for longer than 10 years after the tank was upgraded? (ST.65.1.TEAM)			
If the tank has not been upgraded, is manual tank gauging and annual tank tightness testing used as a leak detection method? (ST.65.1.TEAM)			
Will the UST be upgraded with spill and overfill protection by December 1998? (ST.25.1.TEAM)			
Will the UST have corrosion protection by December 1998? (ST.25.1.TEAM)			
Are tank filling procedures followed that prevent spills? (ST.45.1.TEAM)			
If the UST contains a non-POL substance does the UST meet leak detection requirements by: (ST.25.1.TEAM) <ul style="list-style-type: none"> • Utilizing any of the leak detection methods described above for existing tanks? 			

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PROTOCOL	Y	N	NA
<ul style="list-style-type: none"> Meeting secondary containment and interstitial monitoring requirement? 			
Is the piping steel? If yes, does it have cathodic protection? (ST.25.1.TEAM)			
Releases From USTs			
Has there been a suspected release?			
Were steps taken to confirm if the suspected release was an actual leak? (ST.80.2.TEAM)			
Has there been a confirmed release?			
Was immediate action taken to stop and contain the release? (ST.80.3.TEAM)			
Was the release of a reportable quantity reported to the regulatory agency within 24 hours? (ST.80.1.TEAM)			
If the release was a hazardous substance release, was it reported to the National Response Center?			
Was it determined how far the petroleum has moved and recovery of the leaked petroleum begun? (ST.80.4.TEAM)			
Was any information collected and progress reported to the regulatory authority within 20 days after confirming the release? (ST.80.4.TEAM)			
Was the extent of the contamination determined and reported to the regulatory authority? (ST.80.7.TEAM)			
Was a plan to clean up the site submitted? (see state callouts)			
If requested by the regulatory authority, was a Corrective Action Plan developed and submitted? (see state callouts)			
Were the approved steps implemented? (see state callouts)			
UST Repairs			
Has the UST been repaired?			
Was the UST inspected internally or tightness tested within 30 days of the repairs? (ST.50.2.TEAM)			
Or was one of the monthly leak detection monitoring methods implemented within 30 days? (ST.50.2.TEAM)			
Was the cathodic protection tested with six months of repair? (ST.50.2.TEAM)			
Closing USTs			
Have the UST been temporarily closed for longer than 12 months? (ST.95.1.TEAM)			
Has the leak detection and corrosion protection systems been maintained and monitored during the temporary closure? (ST.95.1.TEAM)			
If the UST has been temporarily closed for more than three months, are the vent lines open and all other lines, pumps, man-ways, and ancillary equipment capped and secured? (ST.95.1.TEAM)			
Was it determined if contamination from the UST was present in the surrounding environment? (ST.95.3.TEAM)			
Was the tank emptied and cleaned? (ST.95.3.TEAM)			
Was the regulatory authority notified 30 days prior to permanently closing the			

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UST? (ST.95.2.TEAM)			
UST Recordkeeping			
<p>Are the following records available</p> <ul style="list-style-type: none"> • Record of leak detection performance and maintenance including monitoring results, the most recent tightness test, performance claims provided by leak detection manufacturers, and records of recent maintenance, repair, and calibration of on-site leak detection equipment? (ST.90.2.TEAM) • Records showing required inspections and tests of the corrosion protection system? (ST.90.2.TEAM) • Records of repairs and upgrades? (ST.90.2.TEAM) • Site assessment results after closing a UST, kept for three years? (ST.95.7.TEAM) 			
WASTE WATER MANAGEMENT			
Does the facility have any ongoing or unresolved consent orders, compliance agreements, notices of violation, interagency agreements, or equivalent enforcement actions pertaining to wastewater management? (WA.1.1.TEAM)			
Does the facility have a state or Federal NPDES permit? If yes for discharges, is the facility meeting the permit requirements? (WA.10.1.TEAM, WA.10.2.TEAM and applicable state requirements)			
Does the facility have a storm water discharge permit? If yes, is the facility meeting the permit requirements? (WA.10.3.TEAM)			
Do facility personnel perform industrial or construction activities that result in the discharge of wastewater or contaminated storm water without a permit? (WA.10.4.TEAM)			
<p>Does the facility own or operate any of the following?</p> <ul style="list-style-type: none"> • Underground injection wells • Monitoring wells • Wash racks • Oil/water separators • Grease traps • Photographic labs • Septic systems (active or inactive) • 			
<p>Does the facility have any unpermitted wastewater discharges, including the following sources? (WA.10.3.TEAM, and WA.85.1.TEAM)</p> <ul style="list-style-type: none"> • Underground injection wells • Wash racks • Oil/water separators • Grease traps • Photographic labs • Septic systems • Floor drains 			

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Does the facility discharge to a POTW/FOTW? If yes, are the following requirements met? (WA.25.1.TEAM through WA.25.9.TEAM) <ul style="list-style-type: none"> • No discharge of pollutants that could cause pass through or interference of the POTW/FOTW • Discharges meet POTW/FOTW pretreatment standards • Facility meets POTW/FOTW reporting requirements • Immediate notification of any discharge that could cause a problem to the POTW/FOTW 			
Does the facility own or operate a wastewater treatment plant? If yes, are the following requirements met? (state requirements) <ul style="list-style-type: none"> • Personnel operating the plant are trained and certified • Staff are trained in safety and occupational health • Operation logs and records are maintained 			
Do facility personnel perform sludge disposal including land application? (WA.105. through WA.135. of the TEAM Guide)			
Does the facility discharge wastewater to wetlands? (WA.10.1.TEAM and applicable state requirements)			