

Audit Procedures for Hazardous Materials Contractors

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1. General

1.1 Purpose This practice tries to reduce GTE Telephone Operations* liability by providing contractor guidelines for conducting environmental site audits of contractors who transport, treat, recycle, store, or dispose of hazardous materials.

1.2 Filing Instructions File this practice in numerical order in your practices set.

1.3 Copyright and Responsibility This practice was written by the Environmental Compliance Staff, Employee Safety Services Department and published by the Telephone Operations Administrative Services Department. For more information about this practice contact the Environmental Compliance Staff, Employee Safety Services Department.

No part of this work may be reproduced or copied in any form or by any means -- graphic, electronic, or mechanical, including photocopying, recording, taping, or information storage and retrieval systems -- without the written permission of the Administrative Services Department, GTE Telephone Operations Headquarters, Irving, Texas.

1.4 Disclaimer This practice has been prepared for GTE Telephone Operations employees. GTE Telephone Operations hereby disclaims any responsibility or liability for any consequential or inconsequential damages that may result from the use of this practice.

2. Overview

2.1 Background Under environmental law, the generator of waste is responsible for that waste forever. This is often referred to as the generator's "cradle to the grave" responsibility for waste.

Under CERCLA, the Environmental Protection Agency has broad authority that requires identification and cleanup of property contaminated with hazardous substances. If the owner or operator of a property can not fund the cleanup, the EPA seeks reparation from other parties that may have contributed to the contamination (PRPs).

Facilities operated by companies who transport, treat, store or dispose of hazardous materials can become contaminated due to releases of hazardous chemicals. If the owner of the facilities can not fund the cleanup, companies who have sent waste to these facilities then become PRPs and are required to participate in the site cleanup.

Therefore, it is critical that the hazardous waste generator choose all transport, treatment, storage, and disposal contractors with care.

2. Overview, continued

2.2 Acronyms

The following acronyms are used in this practice:

Acronym	Definition
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act (Also called the Superfund Act).
DOT	Department of Transportation
EC	Environmental Compliance
EPA	United States Environmental Protection Agency
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act
TSDF	Treatment Storage and Disposal Facility

3. Environmental Audit Requirements

3.1 Audit Requirements

The Area Environmental Compliance staff conducts environmental audits of:

- Contractors used to transport, treat, recycle, store, or dispose of any hazardous or regulated materials.
- Facilities where hazardous or regulated materials are sent for treatment, storage, or disposal.

3.2 Third Party TSDF

Ask contractors to specify the TSDF used for disposal of GTE's waste. Conduct environmental audits of each facility where GTE's waste is sent.

3.3 Waste Transporters

Conduct environmental audits of companies transporting hazardous or regulated waste for GTE Telephone Operations.

3.4 Audit Frequency

Audit hazardous materials contractors:

- Before they are used.
AND
- At least once every two years thereafter.

4. Environmental Audit Procedures

4.1 Environmental Audit

The audit procedure for hazardous materials contractors has five major parts:

- Company background.
- Facility operations.
- Site conditions.
- Safety and emergency procedures.
- Evaluation.

4. Environmental Audit Procedures. continued

4.2 Audit for TSDF

The environmental audit includes gathering information about company and site inspections of the TSDF.

Forms and instructions used for the TSDF audit are found by using the following chart:

Exhibit	Contains the Hazardous Materials Contractor Form For...
1 on page 7	company background.
2 on page 11	Operations and site conditions.
4 on page 19	Evaluation.

4.3 Audit for Transporters

The environmental audit of hazardous materials transporters primarily consists of gathering information about the company. Site audits of transporter facilities are not required provided the facilities are not used to store or stage GTE's waste.

Forms and instructions used for the audit are found by using the following chart:

Exhibit	Contains the Hazardous Materials Contractor Form For...
1 on page 7	Company background.
3 on page 17	Transporter operations and procedures.
4 on page 19	Evaluation.

4. Environmental Audit Procedures, continued

4.4 Audit Procedure

The company background, and the operations and site information required for an audit may be obtained:

- From the security or financial investigation conducted during the contractor approval process.
- By mailing the form to the contractor and requesting that the information be provided.
- During the interview conducted at the site audit.

The information completed by the contractor and returned by mail is reviewed during the site inspection.

Information obtained from the contractor is verified with regulatory agencies where appropriate.

4.5 Additional Forms

Additional audit and evaluation forms can be obtained from the Headquarters Environmental Compliance staff.

Exhibits

GTE Telephone Operations

Hazardous Materials Contractor Company Background

REF GTEP 122-000-001

Facility Name: _____ Location: _____

Completed By: _____ Date: _____

Company Background

1. Company Name and Address: _____

2. Parent Company: _____

3. Subsidiaries/Affiliates: _____

4. Services Offered: _____

5. Company History: _____

6. Permits Held: _____

Exhibit 1- Hazardous Materials Contractor - Company Background Form (page 1 of 4)

Exhibits, continued

Facility Name: _____

Page 2

Financial Conditions

7. Dunn & Bradstreet Number: _____

8. Financial Review: _____

9. Insurance: _____

10. Past, Current & Pending Litigation: _____

11. Regulatory History: _____

References

12. Client References: _____

13. Neighborhood References: _____

Exhibit 1- Hazardous Materials Contractor - Company Background Form (page 2 of 4)

Exhibits, continued

Use the following chart to complete the form and attach additional sheets if required:

In Item...	You...
1	List the company: <ul style="list-style-type: none">• Name.• Mailing address.• Phone number.
2	List the parent company, if applicable.
3	List any subsidiaries or affiliated companies.
4	List the services offered and types of waste handled by the company.
5	Give a brief description of the company's history. Include how and when the company was started and who has owned the company.
6	List the permits held by the company. If the company operates more than one TSDf, the permits for each facility to which GTE's waste is sent should be listed.
7	List the company's Dunn & Bradstreet number.
8	Attach a certified financial statement from the company. Identify the source and type of statement and make any additional comments.
9	Attach a current certificate of insurance. Identify the insurance carrier and any additional comments.
10	List any past, current, and pending lawsuits filed against the company.

(continued)

Exhibit 1 - Hazardous Materials Contractor - Company Background Form (page 3 of 4)

Exhibits. continued

In Item...

You...

11 List any violations or regulatory problems.

12 List the client references:

- Name.
 - Contact person.
 - Phone number.
-

13 List the owners or occupants of adjacent properties:

- Name.
 - Contact person.
 - Phone number.
-

Exhibit 1 - Hazardous Materials Contractor - Company Background Form (page 4 of 4)



**Hazardous Materials Contractor
TSDF Operations/Site Conditions**

REF GTEP 122-000-001

Facility Name: _____ Location: _____

Completed By: _____ Date: _____

Facility Operations

1. Type(s) of Disposal: _____

2. Inspection Log: _____

3. Groundwater Monitoring: _____

4. Rain Water Collection: _____

5. Off-Site Disposal: _____

6. Emissions/Discharge Monitoring: _____

7. Type(s) Of Storage: _____

8. Segregation Of Materials: _____

9. Secondary Containment: _____

**Exhibit 2 - Hazardous Materials Contractor - TSDF Operations and. Site Conditions Form
(page 1 of 6)**

Exhibits, continued

Facility Name: _____

Page 2

Facility Operations (continued)

10. Waste Analysis: _____

11. Approval/Rejection Criteria _____

12. Facility Security: _____

13. Secure Parking: _____

14. Manifest Tracking: _____

15. Certificate of Destruction: _____

16. Overall Housekeeping _____

Site Conditions

17. Adjacent Properties: _____

18. Surface Water Hazards: _____

19. Groundwater Hazards: _____

20. Seismic Potential: _____

Exhibit 2 – Hazardous Materials Contractor – TSD/ Operations and Site Conditions Form
(page 2 of 6)

Facility Name: _____

Page 9

Safety and Emergency Procedures

21. Safety Training: _____

22. Emergency Procedure Training: _____

23. Emergency Treatment Facilities: _____

24. Emergency Contingency Plan: _____

26. Emergency Equipment: _____

26. Personal Protective Equipment: _____

27. Accident History: _____

References

28. Client References: _____

29. Neighborhood References: _____

**Exhibit 2 - Hazardous Materials Contractor - TSD Operations and Site Conditions Form
(page 3 of 6)**

Exhibits, continued

Use the following chart to complete the form, and attach additional sheets if required:

in Item...	You...
1	List the methods of disposal used at this facility.
2	Describe inspection procedures and documentation.
3	Describe the ground water monitoring program. Include the number of wells and frequency of analysis.
4	Describe any rainwater collection and treatment systems.
5	List any waste materials that are transported off-site for disposal. Include the disposal site. For example, many incinerators must have the ash disposed of at a hazardous waste landfill.
6	List any discharges to the environment or to POTWs and describe how they are monitored.
7	Describe the storage methods used at the facility.
8	Describe any procedures used to segregate different types of waste materials.
9	Describe any secondary containment for the storage areas.
10	Describe waste analysis procedures. Is there a laboratory on site?
11	Describe the criteria used in accepting or rejecting waste. Specify procedures for notifying the generator of rejected shipments.
12	List security measures taken at the facility, including gates, guards, and monitors.
13	Describe any secure parking available for shipments that cannot be immediately unloaded.

(continued)

**Exhibit 2 - Hazardous Materials Contractor - TSDF Operations and Site Conditions Form
(page 4 of 6)**

Exhibits, continued

In Item...	You...
14	Describe the manifest tracking system.
15	Indicate whether a Certificate of Destruction is issued in addition to the Uniform Hazardous Waste Manifest.
16	Describe the overall appearance and housekeeping procedures at the facility.
17	List the owners and operators of properties adjacent to the facility.
18	List any lakes, ponds, rivers or streams in the immediate area that could be impacted by the facility.
19	List any ground water wells in the area that are used for drinking water.
20	Indicate the potential for seismic activity in the area.
21	Describe the safety training program at the facility. Is training conducted by contractors or in-house?
22	Describe training for emergency procedures.
23	Describe emergency treatment and first aid facilities.
24	Describe the written emergency contingency plan.
25	List the emergency equipment available at the facility.
26	List the type of personal protective equipment required at the facility. Are the employees conscientious about wearing the equipment?
27	List any accidents that have occurred in the last two years.

(continued)

**Exhibit 2 - Hazardous Materials Contractor - TSDF Operations and Site Conditions Form
(page 5 of 6)**

Exhibits, continued

In Item...

You...

28

List the client references:

- Company name.
 - Contact person.
 - Phone number.
-

29

List the owners or occupants of adjacent properties:

- Company name.
 - Contact person.
 - Phone number.
-

**Exhibit 2 - Hazardous Materials Contractor - TSDF Operations and Site Conditions Form
(page 6 of 6)**

GTE Telephone Operations

**Hazardous Materials Contractor
Transporter Operations/Procedures**

REF GTEP 122-000-001

Facility Name: _____ Location: _____

Completed By: _____ Date: _____

Company Operations

1. Ownership of Vehicles: _____

2. Condition of Vehicles: _____

3. Vehicle Maintenance & Inspection: _____

4. Driver Training: _____

6. Emergency Response Training: _____

6. Safety & First Aid Program: _____

7. Vehicle Placards: _____

8. Driver Logs: _____

9. Record Keeping: _____

**Exhibit 3 - Hazardous Materials Contractor - Transporter Operations and Procedures Form
(page 1 of 2)**

Exhibits, continued

Use the following chart to complete the form, and attach additional sheets if required:

In Item...	You...
1	Indicate whether vehicles are owned or leased.
2	Describe the general condition of the vehicles.
3	Describe the vehicle maintenance and inspection program.
4	Describe required training for company drivers.
5	Describe emergency response training attended by company drivers.
6	Describe the company's Safety and First Aid program.
7	Indicate whether all vehicles have the proper placards.
8	Describe how driver logs are maintained and monitored.
9	Describe record keeping processes used for hazardous waste shipments.

**Exhibit 3 - Hazardous Materials Contractor - Transporter Operations and Procedures Form
(page 2 of 2)**

Exhibits, continued

GTE Telephone Operations

Hazardous Materials Contractor TSDF Evaluation Form

REF GTEP 122-000-001

Facility Name: _____ Location: _____

Completed By: _____ Date: _____

Evaluate the following:

	Good	Fair	Poor	N/A
Provides Needed Service:				
Company's Financial Status:				
Compliance History:				
Client/Neighborhood References:				
Disposal Operations:				
Storage Operations:				
Tracking/Record Keeping:				
Overall House Keeping:				
Overall Security:				
Site Conditions:				
Training Program:				
Emergency Facilities/Equipment:				

Recommended as a Hazardous Materials Contractor: Yes ___ No ___

Comments: _____

Exhibit 4 - Hazardous Materials Contractor - Evaluation Forms (page 1 of 2)

GTE Telephone Operations

**Hazardous Materials Contractor
Transporter Evaluation Form**

REF GTEP 122-000-001

Facility Name: _____ Location: _____

Completed By: _____ Date: _____

Evaluate the following:

	Good	Fair	Poor	N/A
Provides Needed Service:				
Company's Financial Statue				
Compliance History:				
Client/Neighborhood References:				
Condition of Vehicles				
Vehicle Maintenance/Inspection:				
Tracking/Rocord Keeping:				
Overall House Keeping:				
Overall Security:				
Driver Logs:				
Driver Training Program:				
Emergency Equipment:				

Recommended as a Hazardous Materials Contractor: Yes ___ No ___

Comments: _____

Exhibit 4 - Hazardous Materials Contractor - Evaluation Forms (page 2 of 2)