

Checklist

Uncover Hidden Risks:

Your Step-By-Step Guide to RCRA
Compliance



RCRA compliance isn't a once-a-year event. It's a daily practice.

Regulations keep moving. Deadlines stack up. And small oversights — a missed report, an incomplete record — can carry serious consequences. RCRA fines can reach \$70,000 to \$90,000 per day, per violation. This checklist breaks compliance into manageable daily, weekly, and monthly tasks so your team stays organized, audit-ready, and ahead of risk all year long.

Phase One: Daily and Weekly Operations

Strong compliance starts with good daily habits. When your team manages waste properly every day, reporting becomes straightforward instead of stressful.

Daily Checklist

Hazardous Waste Generation Tracking

Log any newly generated hazardous waste, including type, quantity, and location.

Employee Monitoring

Observe waste handling activities to ensure proper procedures are being followed.

Storage Area Monitoring

Check hazardous and solid waste storage areas for cleanliness, proper labeling, organization, and employee safety hazards (such as tripping hazards).

Verify that all waste containers are properly labeled with accumulation start dates, waste type, and hazard information.

Inspect hazardous waste containers to ensure they are closed, labeled, intact, and leak-free.

Weekly Checklist

Conduct Full Storage Area Inspection

Perform a complete check for leaks, spills, and container integrity in storage areas. If you are a SQG or LQG, this check must be written and signed or initialed by the person doing the check.

Confirm that emergency equipment is accessible.

Update Waste Records

Review recent waste manifests to ensure accuracy.

Record weekly totals to stay updated on quantities and generator status.

Track monthly limits to stay within your classification.

Documentation and Label Verification

Verify that all containers are correctly labeled with contents, hazard classification (including visuals), and accumulation start dates.

Check records to ensure that all required documents (manifests, waste logs, notification forms, etc.) are updated and stored for access during reporting periods.

Training and Emergency Response Review

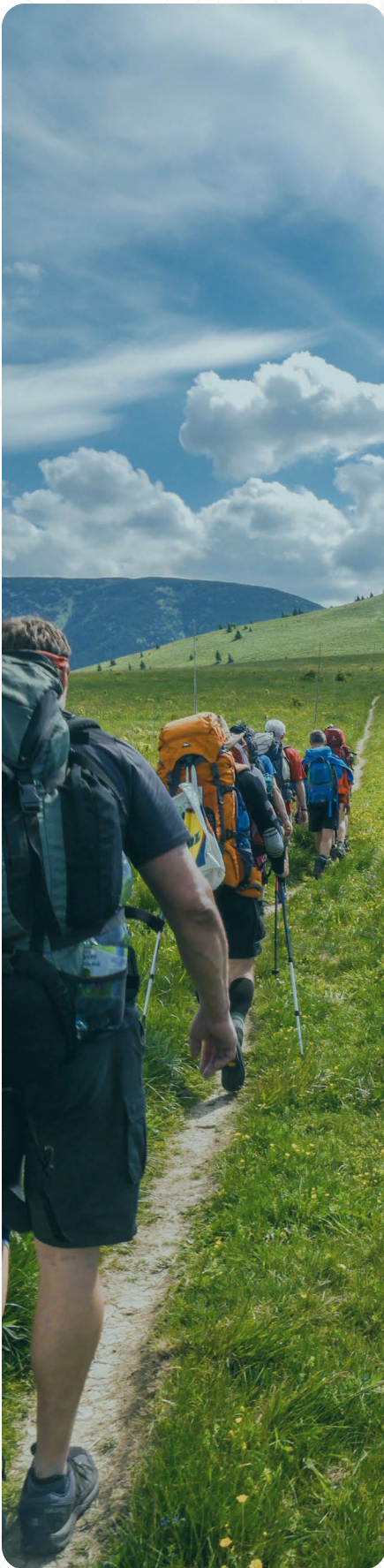
Confirm that all employees are up to date with their training in waste handling and emergency response procedures.

Document any training sessions.



Helpful Tip

Weekly inspections are your early warning system — catch a mislabeled container or leaking drum before an inspector does.



Phase Two: Monthly Monitoring

Monthly reviews help you catch issues before they become violations and keep your data ready for reporting season.

Monthly Checklist

Generator Status Review

Review total hazardous waste generated to ensure compliance with your generator status.

Adjust operations as needed to remain within classification.

Manifest and Recordkeeping Audit

Review all manifests from the previous month to confirm completeness and accuracy.

Ensure manifests and related documentation are stored for a minimum of 3 years.

Check for manifest copies in e-Manifest (required for SQGs and LQGs).

Internal Audits and Inspections

Conduct a monthly audit of waste handling and storage procedures, identifying areas for improvement.

Document audit findings and corrective actions taken to address any issues.

Employee Training Verification

Review training records to confirm that all employees have completed required RCRA and hazardous waste handling training.

Schedule any additional training sessions as needed based on observed performance and regulatory updates.

Report Compliance with State-Specific Requirements

Confirm compliance with any additional state requirements for hazardous waste reporting, such as specific waste codes or quarterly reporting (if required).

Document any state-specific compliance activities or notifications completed.

Phase Three: Annual and Biennial Reporting

Reporting requirements vary by state and generator status — use this phase to prepare and submit.

Biennial Report Preparation (Even-Numbered Years)

Data Collection

Begin compiling data for the biennial report (due March 1st of each even-numbered year).

Verify the accuracy of facility information such as EPA ID, address, and contact details.

Gather details of waste management, disposal methods, and transporter information.

Submission

Submit reports well before the March 1st deadline to allow time for corrections if needed.

Retain copies of submitted reports and supporting documentation for at least three years.

Your Biennial Report must include:

Facility details: EPA ID number, facility name, location, and current contact information.

Waste generation data: All hazardous waste types with corresponding waste codes and quantities.

Management practices: Details of on-site and off-site waste handling, including treatment, storage, and disposal methods.

Transportation information: Records of waste shipments and receiving facilities.

Compliance status: Documentation of any violations or enforcement actions.

Authorized signatures: Certification of report accuracy by qualified facility personnel.

Annual Report Preparation (If Required by Your State)

Some states require annual hazardous waste reports regardless of generator status. Requirements vary significantly by state.

Verify Requirements

Check your state's specific requirements (they may change annually).

Confirm deadlines, which typically fall between January 1st and March 1st.

Review any state-specific data fields or supplemental requirements.

Maintain Records

Keep monthly waste generation records to ensure accurate reporting.

Document generator status changes throughout the year.

Set internal deadlines ahead of state submission dates to allow for review.



Helpful Tip

Don't wait until February to start your biennial or annual report. Begin collecting data in the fall so you have time to track down missing information and resolve discrepancies with vendors.

Phase Four: Post-Reporting and Ongoing Maintenance

After submission, compliance doesn't stop. Use this phase to confirm completion and strengthen your processes for next year.

Post-Reporting Checklist

Confirm Submission

Verify that reports were received by the appropriate agencies.

Confirm all filing fees and invoices have been paid.

Save confirmation emails, receipts, or proof of submission for audit documentation.

Process Review

Schedule a post-season review meeting with stakeholders to identify what worked and what can improve next year.

Document lessons learned and process improvements.

Recordkeeping

Centralize all submitted documents — including reports, receipts, and correspondence — in one accessible location.

Ensure records are retained for the required minimum of 3 years (or longer if state requirements exceed this).

Monitor Regulatory Changes

Review any federal or state requirement changes that occurred during the year.

Update internal procedures to reflect new requirements.

Contact your state agency early with questions before the next reporting cycle.

Continuous Improvement

Review waste generation trends to identify opportunities for waste minimization.

Update training materials based on common errors or process changes.

Revisit your processes monthly to keep data current and reduce last-minute workloads.

“Organizations need to decrease the amount of waste they generate, particularly hazardous waste. To enable this, EHS teams need a holistic view of their waste generation. That way, they can make informed decisions on recycling or process improvements. This sets the foundation for more sustainable environmental programs.”




Jess Williams
Technical Program Manager, Encamp

Closing Thoughts

RCRA compliance is more than a reporting requirement. It's a commitment to protecting your teams, your communities, and the environment.

At Encamp, we believe good for business should also mean good for the environment. By combining smart automation with trusted expertise, we help EHS professionals turn complex compliance work into meaningful progress.

Hazardous waste management is only one part of the journey. But when you get it right, it builds a foundation of confidence and consistency — one that scales across your entire organization.



**Ready to bring proven partnership and
a compliance-first approach to your
waste operations?**

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