

Company: _____

Facility name/location: _____

Checklist completed by: _____

Date: _____

Environmental Compliance Checklist for Short Line Railroads			
Topic	Question (Page reference to Workbook)	Response	Comments
1.0 WASTE MANAGEMENT - GENERAL			
1.1 Hazardous Waste Generation, Storage, and Transport	a. Has the facility determined if it generates hazardous waste? (p. W-2)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. Has the facility identified which wastes are hazardous wastes? (p. W-2)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. If yes, how much hazardous waste does the facility generate a month? (p. W-4)	1) ≤ 220 lbs 2) >220 - < 2,200 lbs 3) ≥ 2,200 lbs	
	d. Does the facility have an EPA hazardous waste generator ID number? (p. W-4)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
	e. Does the facility store hazardous waste in approved storage containers? (p. W-5)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	f. Does the facility meet all hazardous waste storage (quantity and time) requirements? (p. W-5)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	g. Does the facility ship hazardous waste offsite for disposal? (p. W-6)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	h. Does the facility have hazardous waste manifests or shipping papers on file? (p. W-6)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	i. Does the facility meet all personnel training and emergency procedure requirements? (p. W-6)	Y <input type="checkbox"/> N <input type="checkbox"/>	
1.2. Used Oil	a. Are used oil containers and associated piping: (1) leak free? (2) segregated? (3) labeled? (p. W-7)	Y <input type="checkbox"/> N <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. Does the facility prevent the mixing of used oil with hazardous waste fluids? (p. W-8)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. Is used oil: (1) collected and sent offsite for recycling? (2) burned in an onsite space heater? (p. W-8)	Y <input type="checkbox"/> N <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>	
	d. If transporting its own used oil, does the facility transport less than 55 gallons at one time? (p. W-8)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	e. Does the facility completely drain used oil filters and fuel filters before disposal? (p. W-9)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	f. How are used oil filters managed? (p. W-9)	Recycle/Service/Trash/Other	
	g. How are used fuel filters disposed? (p. W-9)	Recycle/Service/Trash/Other	
	h. Has the facility determined if its used fuel filters are hazardous? (p. W-10)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	i. Does the facility inspect used oil filter storage areas for oil spills and leaks? (p. W-10)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	j. Does the facility inspect locomotive storage track areas for oil spills and leaks? (p. W-10)	Y <input type="checkbox"/> N <input type="checkbox"/>	

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1.3 Used Solvents	a. Are used solvents stored in proper containers and properly labeled? (p. W-10)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. How are used solvents disposed? (p. W-11)	Service/Mixed/Other	
1.4 Used Battery Storage and Disposal	a. What types of batteries are used at the facility? (p. W-12)	Lead acid/NiFe/NiCd/ Carbonaire/Carbon-Zn/ Single-use disposable/Other	
	b. Does the facility properly store used batteries? (p. W-12)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. How does facility dispose of used batteries? (p. W-13)	Return to supplier/Recycle/ Hazardous waste landfill/Other	
	d. If facility has batteries that are classified as universal wastes, are they managed according to the Universal Waste Rule? (p. W-13)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
1.5 Rags/Shop Towels	a. How does the facility dispose of used rags and shop towels? (p. W-13)	Service/Burned for heat/Trash	
	b. How are used rags and shop towels stored while onsite? (p. W-13)	Separate container/Shop trash can/Floor	
1.6 Fueling	a. Does the facility use measures to prevent fuel spills during fueling of locomotive and vehicles? (p. W-14)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. Is Stage I vapor recovery equipment operated properly during unloading of gasoline? (p. W-14)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
	c. Is Stage II vapor recovery equipment installed and operating properly at pumps? (p. W-14)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
	d. Do fuel delivery records indicate compliance with appropriate fuel requirements? (p. W-15)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	e. Are pumps clearly labeled with the product they contain? (p. W-15)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	f. Do gasoline pump nozzles comply with 10 gallon/minute flow rate? (p. W-15)	Y <input type="checkbox"/> N <input type="checkbox"/> Don't Know <input type="checkbox"/>	
	g. Is fueling overfill protection/spill containment/spill response equipment provided? (p. W-16)	Y <input type="checkbox"/> N <input type="checkbox"/>	
1.7 Absorbents	a. Does facility use sawdust, soil, or other commercial absorbents for spills or leaks? (p. W-16)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. How does the facility dispose of absorbents used for oil spills? (p. W-16)	Burned for energy/Landfilled/ Characterized as special waste/NA	
1.8 Recordkeeping	Does facility maintain all required environmental compliance records? (p. W-17)	Y <input type="checkbox"/> N <input type="checkbox"/>	
2.0 MECHANICAL OPERATIONS			
2.1 Brake Repair	How does facility discard used brake shoes and/or other locomotive components? (p. W-18)	Recycled offsite/Reclaimed/ Disposed by vendor/NA	

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2.2 Equipment Cleaning	a. Does the facility conduct large scale equipment cleaning? (p. W-19)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. If yes, how is washwater disposed? (p. W-19)	Storm sewer or surface water/ Sanitary sewer/Street/Ground	
	c. Does the facility have all required wastewater discharge permits? (p. W-20)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
	d. Does the facility conduct small scale cleaning? (p. W-20)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	e. What kind of cleaning agents does the facility use to conduct small scale cleaning? (p. W-20)	Water/Surfactants/Steam/ Chemical solvents/Other	
	e. Are parts cleaner sinks kept closed and sealed except when actually cleaning parts? (p. W-20)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	f. How are spent cleaning agents and sludge discarded? (p. W-20)	Third party vendor/Storm sewer or surface water/Sanitary sewer/ Ground	
2.3 Hydraulic Oils	a. How does the facility dispose of used hydraulic oil? (p. W-21)	Recycle/Blended with oils/ Mixed with hazardous fluids	
	b. Does facility inspect regularly for hydraulic oil spills? (p. W-22)	Y <input type="checkbox"/> N <input type="checkbox"/>	
2.4 Locomotive Coolant Disposal	How are used locomotive coolants discarded? (p. W-22)	Recycle/Sanitary sewer/Onsite wastewater treatment/Ground/ Storm sewers or surface waters	
3.0 ENGINEERING OPERATIONS			
3.1 Track Ballast Disposal	Does facility store and dispose of track ballast contaminated by petroleum products or hazardous materials? (p. W-24)	Y <input type="checkbox"/> N <input type="checkbox"/>	
3.2 Asbestos	a. Have all buildings and structures built prior to 1980 been assessed for their potential for containing asbestos? (p. W-24)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. Does the facility document demolition procedures? (p. W-25)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. Are employees informed of buildings and structures containing asbestos and trained to work with asbestos-containing materials? (p. W-25)	Y <input type="checkbox"/> N <input type="checkbox"/>	
3.3 Construction Activities	a. How are construction wastes discarded? (p. W-25)	Offsite/Open burning/Onsite	
	b. Have you determined if there any endangered species which may be affected by your construction activities? (p. W-26)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. Have you determined if there are any wetlands that may be affected by your construction activities and which may require a CWA 404 permit? (p. W-26)	Y <input type="checkbox"/> N <input type="checkbox"/>	

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3.4 Crossties	How are crossties discarded? (p. W-27)	Onsite landfill, chipping, or incineration/Give to public/ Offsite landfill or incineration/ Abandonment	
3.5 Pesticides Use	a. Does facility use any restricted use pesticides? (p. W-28)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. If yes, does the state require facilities applying restricted use pesticides to register? (p. W-28)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. If yes, is the facility registered with the state? (p. W-28)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	d. Are all restricted use pesticides applied only by a trained certified applicator? (p. W-28)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	e. If pesticides are applied by subcontractors, does facility receive copies of MSDSs? (p. W-29)	Y <input type="checkbox"/> N <input type="checkbox"/>	
3.6 Onsite Waste Disposal	Does the facility dispose of nonhazardous waste onsite in a permitted landfill or dump? (p. W-29)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
3.7 Tracksides Lubricating	a. Does facility conduct tracksides lubricating? (p. W-29)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. If yes, does the facility place absorbent fabric around rail lubricators to prevent ground contamination with oil? (p. W-30)	Y <input type="checkbox"/> N <input type="checkbox"/>	
3.8 Storage Tanks	a. Has the State UST program been notified of any USTs located onsite? (p. W-30)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
	b. Does facility conduct leak detection for tank and piping of all onsite UST systems? (p. W-30)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. Do USTs at the facility meet requirements for spill, overfill, and corrosion protection? (p. W-31)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	d. Are records and documentation readily available (as applicable) for installation, leak detection, corrosion protection, spill/overfill protection, corrective action, financial responsibility and closure? (p. W-32)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	e. Does the facility have aboveground storage tanks (ASTs)? (p. W-32)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	f. Do ASTs meet or exceed NFPA 30A requirements? (p. W-33)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	g. Are ASTs inspected daily for leaks and other hazardous conditions? (p. W-33)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	h. Does the facility store gasoline, fuel oil, or lubricating oil capacity storage total greater than 1,320 (or greater than 660 gallons in any one tank) in aboveground storage tanks or total underground tank storage capacity greater than 42,000 gallons? (p. W-34)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	i. If yes, could spilled gasoline, fuel oil, or lubricating oil conceivably reach navigable waters? (p. W-34)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	j. If yes, does the facility have a Spill Prevention Control and Countermeasures (SPCC) plan signed by a Professional Engineer? (p. W-34)	Y <input type="checkbox"/> N <input type="checkbox"/>	
k. Are phone numbers of the national, state and local emergency contacts posted onsite for immediate reporting of oil or chemical spills? (p. W-35)	Y <input type="checkbox"/> N <input type="checkbox"/>		

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3.9 Wastewater Management	a. Does facility prevent the discharge of industrial wastewater to septic systems, dry wells, cesspools, drain fields, etc.? (p. W-35)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
	b. Can the facility identify the final destination of all its drains and sumps? (p. W-35)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. If wastewater is discharged to storm water sewer or directly to surface waters, does facility have an NPDES permit? (p. W-35)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
	d. Does the facility have an emergency response/storm water management plan? (p. W-36)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	e. If yes, has the plan been reviewed annually? (p. W-36)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	f. If wastewater is discharged to a municipal sanitary sewer, has facility notified POTW about potential contamination in wastewater and received approval for discharges? (p. W-36)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
	g. How is sludge, produced from wastewater treatment, discarded? (p. W-37)	Offsite to TSD/Offsite disposal/ Onsite/NA	
	h. Are there any activities at the facility that may impact wetlands and require a CWA Section 404 permit? (p. W-37)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	i. If the facility stores parts, fluids and/or other materials outside, are the materials protected from rain/snow to prevent storm water discharges? (p. W-37)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
3.10 Yard Dust Control	a. Are road and yard dust emissions controlled by the use of water or other dust suppressants? (p. W-38)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. If yes, does facility prohibit the use of used oils and other liquid waste to suppress dust? (p. W-38)	Y <input type="checkbox"/> N <input type="checkbox"/>	
4.0 TRANSPORTATION OPERATIONS			
4.1 Hazardous Material Transport	Are hazardous material inspections conducted routinely by transportation crews? (p. W-39)	Y <input type="checkbox"/> N <input type="checkbox"/>	
4.2 Locomotive Emissions	Are locomotive emissions currently minimized by: (1) limiting idling times, or (2) limiting the areas in which engines can idle? (p. W-39)	Y <input type="checkbox"/> N <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>	
4.3 Leaks and Spills	Are crews trained to detect and report all spills and leaks immediately? (p. W-40)	Y <input type="checkbox"/> N <input type="checkbox"/>	

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5.0 OTHER OPERATIONS			
5.1 Metal Machining	Is scrap metal stored in a covered and contained area? (p. W-41)	Y <input type="checkbox"/> N <input type="checkbox"/>	
5.2 Painting	a. Does the facility conduct depainting/painting operations? (p. W-41)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. Does the facility have any air permits? (p. W-41) Permit No(s): _____	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. If yes, are the air permit conditions being met? (p. W-42)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	d. Are surfaces to be painted prepared by shot or grit blasting, grinding, or sanding? (p. W-42)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	e. If yes, are paint stripping waste and metal dusts collected? (p. W-42) f. If yes, how are paint stripping waste and baghouse dusts discarded? (p. W-43)	Y <input type="checkbox"/> N <input type="checkbox"/> Onsite disposal/Landfill/Other	
	g. In its painting operations, does facility use low VOC paints? (p. W-43)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	h. Does facility mix paint amounts according to need? (p. W-43)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	i. Are measures used to minimize overspray? (p. W-43)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	j. Are paints and thinners properly contained and labeled when not in use? (p. W-44)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	k. How are used paint, thinners and solvents discarded? (p. W-44)	Returned to supplier/Reuse/Recycle/Onsite disposal/Mix with other fluids/Landfill	
l. If hazardous paints are used, are spray paint booth air filters disposed of properly as hazardous waste? (p. W-45) m. If filters are not hazardous, how are they disposed? (p. W-45)	Y <input type="checkbox"/> N <input type="checkbox"/> Recycle/Landfill		
5.3 PCB-Containing Equipment	a. Has facility assessed electrical equipment for potential to contain PCBs? (p. W-45)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	b. Is all PCB-containing equipment labeled and inspected quarterly? (p. W-46)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. Does the facility store all out-of service PCB-containing equipment in a designated area? (p. W-46)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	d. Does the facility clean up all PCB leaks properly? (p. W-47)	Y <input type="checkbox"/> N <input type="checkbox"/>	
5.4 Air Conditioning Repair	a. Does the facility maintain and/or repair CFC-containing equipment? (p. W-47) b. If yes, is maintenance of CFC-containing equipment conducted by trained and certified technicians? (p. W-47)	Y <input type="checkbox"/> N <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>	
	c. Are all CFCs removed from equipment prior to maintenance activities? (p. W-48)	Y <input type="checkbox"/> N <input type="checkbox"/>	
	d. Is CFC recovery and/or recycling equipment EPA approved? (p. W-48)	Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/>	
	e. If recovery equipment is used, is refrigerant reclaimed by an EPA-approved reclaimer? (p. W-48)	Y <input type="checkbox"/> N <input type="checkbox"/>	