

Hazardous Waste Compliance Checklist (India) by EHSSaral

Written by

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(Built from 25+ years ground experience — audits, inspections, failures, recoveries)

1. Waste Identification & Classification (Where Most Problems Begin)

Basic Compliance

- All waste streams identified and documented
 - Hazardous vs non-hazardous classification done correctly
 - Waste category mapped as per Schedule I / II / III
 - Updated classification as per latest amendments
 - MSDS available for all hazardous chemicals
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What Inspectors Actually Check

- Whether your classification matches **actual process**, not just paperwork
 - Whether you are **under-reporting hazardous waste** to reduce compliance load
 - Whether waste type matches **manifest category**
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Common Mistakes (Seen in Real Audits)

- Treating sludge as non-hazardous without testing
 - Copy-pasting category from consultant reports
 - Not updating classification after process change
 - Ignoring mixed waste streams
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Pro Tips (From Field Experience)

- Always validate classification with **lab analysis at least once/year**
 - If in doubt → classify as hazardous (safer during inspection)
 - Maintain a **waste mapping diagram** (process → waste → disposal)
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2. Authorization & Legal Compliance

Must-Have Documents

- Valid Hazardous Waste Authorization from SPCB
 - Consent to Operate (CTO) includes hazardous waste conditions
 - Authorized waste quantity within permitted limits
 - Category-wise waste approval available
 - Renewal tracked and applied before expiry
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What Inspectors Check

- Expired authorization (very common trigger)
 - Quantity mismatch (generated vs permitted)
 - Unauthorized waste category handling
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Common Mistakes

- Assuming CTO = HW authorization (not always true)
 - Ignoring renewal timelines
 - Generating new waste type without approval
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Pro Tips

- Keep **authorization copy printed in file + soft copy ready**
 - Highlight relevant sections for quick reference during inspection
 - Track validity in **monthly compliance calendar**
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3. Storage & Handling (Most Visible Area During Inspection)

Physical Requirements

- Dedicated hazardous waste storage area
 - Impervious floor (no soil contact)
 - Covered storage (protection from rain)
 - Proper ventilation
 - Secondary containment (for liquids)
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Labelling & Segregation

- Proper labels on all containers
 - Hazard symbols clearly visible
 - Category-wise segregation
 - Date of generation mentioned
 - Storage duration tracked
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What Inspectors Check

- Whether labels are **actually readable**
 - Whether waste is **mixed or segregated properly**
 - Whether storage looks like a **dump yard or controlled area**
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Common Mistakes

- Missing labels or faded labels
 - Open drums / leaking containers
 - Mixing different waste categories
 - No tracking of storage duration
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Pro Tips

- Treat storage area like a **mini TSDF (not a dumping corner)**
 - Use **color coding for different waste types**
 - Take monthly photos → maintain record
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4. Manifest System & Transportation (Critical Compliance Layer)

Documentation

- Form 10 (Manifest) generated for every dispatch
 - All 7 copies properly maintained
 - Transporter details verified
 - Vehicle authorization checked
 - Manifest signed at all stages
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What Inspectors Check

- Missing manifest copies
 - Incomplete signatures
 - Mismatch in quantity
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Common Mistakes

- Treating manifest as “vendor responsibility”
 - Losing copies after dispatch
 - Not reconciling returned copies
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Pro Tips

- Maintain **digital + physical manifest tracker**
 - Follow up until **final copy is received**
 - Never close dispatch without **complete documentation loop**
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5. TSDF / Final Disposal Verification (BIGGEST BLIND SPOT)

Must Verify

- Vendor is SPCB authorized
 - TSDF facility is approved
 - Disposal certificates received
 - Quantity matches dispatch
 - Type of disposal (incineration / landfill) verified
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What Inspectors Check

- Proof of final disposal
 - Traceability till TSDF
 - Vendor authenticity
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Common Mistakes

- Assuming “vendor took it → done”
- Not verifying TSDF

- Missing disposal certificates
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Pro Tips

- Always ask: **“Where exactly did my waste go?”**
 - Maintain **vendor evaluation file**
 - If possible → visit TSDF once
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6. Records, Registers & Returns (Where Inspections Are Won or Lost)

Form 3 – Hazardous Waste Logbook

Must Maintain

- Daily/regular entry of hazardous waste generation
 - Category-wise quantity recorded
 - Method of storage mentioned
 - Dispatch details recorded
 - Balance quantity updated
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What Inspectors Check

- Whether entries are **real-time or backdated**
 - Whether quantities match:
 - Actual generation
 - Manifest records
 - Whether handwriting / data looks **fabricated**
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Common Mistakes

- Filling Form 3 once a month
 - Copying numbers from old data
 - Not updating balance quantity
 - Keeping blank registers “just in case”
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Pro Tips

- Maintain **weekly entries (minimum)**

- Cross-check with:
 - Production
 - ETP sludge
 - Keep **last 6 months fully clean and updated**
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Form 4 – Annual Return

Must Ensure

- Submitted before deadline
 - Category-wise waste reported
 - Quantity matches:
 - Form 3
 - Manifest
 - Disposal details included
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What Inspectors Check

- Mismatch between Form 3 vs Form 4
 - Under-reporting of waste
 - Missing categories
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Common Mistakes

- Treating Form 4 as “year-end formality”
 - Guessing quantities
 - Not reconciling data
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Pro Tips

- Prepare Form 4 using **monthly consolidated data**
 - Keep backup calculation sheet ready
 - Treat Form 4 as **audit document, not submission form**
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7. Documentation Consistency (Invisible but Critical Layer)

Cross-Verification Checklist

- Form 3 vs Manifest quantities match
 - Manifest vs TSDf certificate match
 - Authorization vs actual generation match
 - Storage records vs physical stock match
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What Inspectors Actually Do

They don't just check documents.

They **connect them**.

“Show me your Form 3 → Now show manifest → Now show disposal proof.”

Common Mistakes

- Documents individually correct but inconsistent together
 - Missing link between dispatch and disposal
 - No internal reconciliation
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Pro Tips

- Think like inspector:
 - Can you trace **one waste stream end-to-end in 2 minutes?**
 - Maintain **monthly reconciliation sheet**
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8. Inspector Mindset (This Changes Everything)

What Inspectors Are Actually Thinking

They are not just checking compliance.

They are asking:

- “Is this system reliable?”
 - “Can I trust this data?”
 - “Is this company hiding something?”
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What Builds Trust

- Clean, structured documentation
 - Consistent data
 - Clear answers (no confusion)
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What Breaks Trust Immediately

- Over-perfect numbers
- Missing records
- Confused EHS officer
- Statements like:

“Vendor handles it...”

Pro Tips

- Train your team to answer:
 - “Where is this waste going?”
 - Keep:
 - 1 file → complete hazardous waste story
 - Always speak:
 - **Simple + factual + confident**
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9. Real Risk Scenarios (Seen Multiple Times)

Scenario 1: Missing Disposal Proof

- Waste dispatched ✓
- Manifest partially complete ✓
- TSD certificate ✗

Result:

- Show cause notice
 - Compliance doubt
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Scenario 2: Quantity Mismatch

- Form 3: 10 MT
- Manifest: 8 MT

Question:

“Where did 2 MT go?”

Scenario 3: Unauthorized Vendor

- Vendor collected waste
- Later found unauthorized

Result:

- Full liability on factory
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Scenario 4: Storage Violation

- Waste stored >90 days
- No tracking

Result:

- Direct non-compliance
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Pro Insight

Most problems are not illegal acts.

They are:

tracking failures

10. Audit Readiness Checklist (Before Inspector Visit)

Documentation Ready

- Authorization copy
- Consent copy
- Form 3 updated
- Form 4 submitted
- Manifest file complete
- TSDF certificates available

Site Ready

- Storage area clean
- Labels visible
- No leakage / spillage
- Segregation maintained

Team Ready

- EHS person aware of system
- Backup person available
- Clear answers prepared

Final Check

- Can you trace:
 - generation → storage → transport → disposal?

If not → you are not audit-ready.

11. Vendor Selection & Management (Where Liability Actually Starts)

Vendor Qualification Checklist

- Vendor has valid SPCB authorization
- Authorization covers **your waste category**
- TSDF linked to vendor is approved
- Transporter is authorized
- PAN, GST, and company details verified

What Inspectors Check

- Vendor authorization validity
- Whether vendor is handling **multiple categories illegally**
- Whether transporter is compliant

Common Mistakes

- Choosing vendor based only on **cost**
 - Not checking category-specific authorization
 - Assuming “big name vendor = compliant”
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Pro Tips

- Maintain **vendor qualification file**
 - Reverify authorization every **6 months**
 - Keep **backup vendor ready**
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Vendor Performance Tracking

Must Track

- Pickup timelines
 - Documentation completeness
 - Manifest closure time
 - Disposal certificate delays
 - Compliance issues history
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Common Mistakes

- No tracking after onboarding
 - Ignoring repeated delays
 - No escalation mechanism
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Pro Tips

- Create **vendor scorecard**
 - Mark vendors as:
 - Green (reliable)
 - Yellow (monitor)
 - Red (avoid)
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12. Hazardous Waste Agreement (Most Underrated Protection)

Must-Have Clauses

- Scope of waste categories
 - Responsibility for collection & transport
 - Documentation requirements
 - Timeline for manifest closure
 - Disposal proof submission
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Critical Clause (DON'T MISS)

✓ *Right to Audit*

- Factory can visit TSDF
- Factory can verify disposal process

This means:

You are not blindly trusting.

What Most People Get Wrong

- Contract says:

“Vendor responsible for disposal”

Reality:

- Law still holds **you responsible**
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Pro Tips

- Agreement should protect **operations**, not replace **legal responsibility**
 - Always align agreement with:
 - Authorization
 - Consent conditions
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13. Advanced Best Practices (From 25+ Years Experience)

1. Monthly Reconciliation System

- Waste generated vs disposed matched
- Balance quantity verified
- Variance analyzed

This alone prevents **80% of issues**

2. Visual Documentation

- Monthly storage photos
- Dispatch photos
- Label condition photos

Helps during:

- inspections
 - disputes
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3. Single “Hazardous Waste Master File”

Include:

- Authorization
- Consent
- Form 3
- Form 4
- Manifest
- TSDf certificates
- Vendor details

One file = full story

4. Team Training

- Operators know:
 - what is hazardous waste
 - Store team knows:
 - segregation rules
 - Security knows:
 - what documents to check
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5. Think Like an Inspector

Ask yourself:

- Can I trace waste end-to-end?
- Is my data consistent?

- Will this look suspicious?
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14. System-Based Compliance (This Is The Future)

✘ Old Way

- Excel
- Files
- Follow-ups
- Memory

Result:

- Gaps
 - Stress
 - Risk
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New Way (What High-Performing Plants Are Moving Towards)

- Task-based compliance
- Automated tracking
- Alerts for missing links
- Centralized documentation

This is Where EHSSaral Can help your Plant.

What This Changes

- No dependency on memory
 - No missing documents
 - No panic during inspection
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15. Final Master Checklist (Quick Audit View)

Legal

- Authorization valid
 - Consent updated
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Operations

- Waste classified
 - Storage compliant
 - Segregation maintained
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Movement

- Manifest complete
 - Transport verified
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Disposal

- TSDF verified
 - Disposal proof available
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Records

- Form 3 updated
 - Form 4 submitted
 - Data consistent
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Vendor

- Authorized
 - Verified
 - Tracked
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System

- Reconciliation done
- Audit ready
- Traceability ensured

