



The RRC Chapter 4 Readiness Checklist

Section 1: Waste Characterization

4.190 **Standardized Waste Profiles:** Do you have a completed **Form EP-9** (or equivalent) for every unique waste stream (Types 01–31) on site?

Basis of Characterization: Is your "Process Knowledge" documented? If using lab data, is the TPH, pH, and Salinity data less than 12 months old?

Generator Certification: Does your profile include the mandatory P-5 Operator Number and a signature from an authorized representative?

Section 2: Manifesting & Transportation

Form EP-10 Compliance: Do your current tickets capture all 5 RRC-required data points: Generator P-5, Transporter Permit, Receiver ID, Exact Volume, and Date?

4.191 **Hauler Verification:** Do you have a system to verify that your waste hauler's permit is active *before* the truck leaves the lease?

Digital vs. Paper: If using an electronic system, does it allow for the "Discrepancy Reporting" required if the receiver's volume doesn't match the generator's?

Section 3: Record Retention & Audits

The 3-Year Archive: Are your manifests stored in a central, searchable location for a minimum of 3 years?

4.194 **15-Minute Retrieval:** Can your field or office staff produce a specific manifest from two years ago within 15 minutes of an RRC inspector's request?

Trans-Jurisdictional Tracking: (Effective Dec 31, 2026) Are you prepared to report waste transfers across TCEQ/RRC jurisdictional lines?

The “Galatea Gap”

Manual Process		
Waste Characterization (4.190)	Relies on "tribal knowledge" or outdated lab tests. High risk of Form EP-9 rejection.	Built-in logic for all 31 RRC waste types. Auto-validates characterization data.
Manifest Accuracy (4.191)	Smudged signatures, illegible volumes, and missing hauler permit numbers.	Digital verification at source. GPS-stamped and 100% legible.
P-5 & Permit Validation	Requires manual checking of RRC databases (often skipped in the field).	Real-time API integration. Blocks manifesting if a hauler's P-5 or permit is expired.
Record Retention (4.194)	Filing cabinets or siloed PDFs. Discovery during an audit takes days.	Audit-Ready Vault: Instant, searchable 3-year digital archive.
Trans-Jurisdictional Reporting	Manual tracking of waste crossing into TCEQ or out-of-state lines.	Automated alerts and reporting for multi-jurisdictional movements.

If your current workflow looks like the middle column, the RRC's December 2026 deadline is a major risk. See the difference Galatea makes and

[book a demo.](#)