



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Waste Characterization (4.190)	Relies on "tribal knowledge" or outdated lab tests.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.](#)