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# Small Quantity Generator (SQG) of Hazardous Waste

Iowa Waste Reduction Center / University of Northern Iowa  
319-273-8905 or 1-800-422-3109

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40 CFR Part 262

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## *Do these regulations apply to my operation?*

If your facility generates between 220 and 2,200 pounds of hazardous waste in any calendar month or stores between 2,200 and 13,200 pounds of hazardous waste on site at any time, this regulation applies. Facilities generating or storing more or less than these limits are subject to the Large Quantity Generator (LQG) or Conditionally Exempt Small Quantity Generator (CESQG) regulations respectively.

## *General Requirements*

- All waste generators must, at a minimum:
  - Accurately characterize each facility waste as hazardous or non-hazardous.
  - Maintain an inventory documenting the facility's monthly hazardous waste generation rate and the amount of hazardous waste stored on site.
  - Manage hazardous wastes in compliance with applicable on- and off-site federal regulations.

## *What are the benefits of proper management of hazardous waste?*

Hazardous waste regulations were established to minimize human and environmental exposure to hazardous chemicals. The Environmental Protection Agency (EPA) has written a comprehensive set of regulations that govern the management of hazardous waste from the point of generation to disposal. They also incorporate a record keeping/reporting/tracking system to verify and document that the waste is, in fact, managed appropriately. Finally, compliance with hazardous waste regulations is an enforceable law. Noncompliance can result in fines of up to \$32,500 per day for each violation.

## *SQG Regulatory Requirements*

In addition to the general requirements listed previously, SQGs must also comply with the following:

### **EPA Identification Number**

SQGs must obtain an EPA Hazardous Waste Generator Identification Number. This number is used to identify the facility and the hazardous waste activities occurring there. It is also required on all waste shipping papers. An ID number is obtained by completing the form enclosed in EPA's "Notification of Regulated Waste Activity" booklet (EPA Form 8700-12).

## **Waste Generation, Accumulation and Storage**

- SQGs may not generate more than 2,200 pounds of hazardous waste in any calendar month, nor store more than 13,200 pounds of hazardous waste on site at any given time. If either limit is exceeded, the facility becomes subject to the more stringent Large Quantity Generator (LQG) regulations.
- Hazardous waste storage containers must remain sealed, except when adding or removing waste.
- Hazardous waste storage containers must be clearly labeled “Hazardous Waste”.
- Up to 55 gallons of hazardous waste may be accumulated at the point of generation and under the supervision of the individual generating the waste for an indefinite period of time. The container must be labeled “Hazardous Waste” or other words to identify the contents and should include “Satellite Accumulation”. When 55 gallons has accumulated, the satellite accumulation container must be moved to a permanent hazardous waste storage area within three days.
- Hazardous waste containers must be marked with the date they first received waste or the date when moved from the satellite accumulation area to the permanent hazardous waste storage area.
- The permanent hazardous waste storage area must be inspected weekly for leaking containers, proper container labeling and dating to assure the containers are sealed, and to maintain adequate access to all containers. Weekly inspections should be documented in a logbook that is maintained on site.
- Hazardous waste may not be stored on site for more than 180 days (270-day storage is allowed if the waste is being transported more than 200 miles for proper management).

## **Preparation for Off-Site Transportation**

- Hazardous waste storage containers must be packaged, labeled, and marked according to the Department of Transportation’s (DOT) hazardous materials transport regulations. This includes the following information on each container:
  - “HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency”
  - Generator's Name and Address
  - Manifest Document Number
  - Commercially available labels can be used.
  - The generator must assure the hazardous waste transport vehicle is affixed with the appropriate DOT placards.

## **Shipping Papers**

- A Uniform Hazardous Waste Manifest must accompany all shipments of hazardous waste.
- The manifest is a multiple copy form that must be signed by the generator, transporter, and disposal facility personnel. Each entity should keep its respective copy of the form. The original copy of the manifest must be returned to the generator by the disposal facility within 60 days.
- Both the generator and original copy of the manifest must be filed on site and be readily

available for inspection for at least three years.

- For waste subject to Land Ban restrictions, a Treatment Standard Notification (TSN) form must accompany the hazardous waste manifest. The transporter/disposal facility will assist in determining if a TSN is required. If so, a copy must remain on site and be readily available for inspection for at least three years.

### **Preparedness and Prevention**

- Hazardous waste storage areas must be maintained and operated to minimize the possibility of fire, explosion, or release of hazardous waste.
- Hazardous waste storage areas must be equipped with or provide immediate access to the following:
  - Internal communications or alarm system
  - A telephone to summon emergency assistance from local authorities
  - Fire extinguisher and control equipment
  - Spill control equipment
  - Water to supply hoses or sprinkler systems
- All equipment must be tested and maintained to assure proper operation.
- When hazardous waste is handled, all personnel involved must have immediate access to an internal alarm or emergency communication device.
- If just one employee is present, he or she must have immediate access to a device capable of summoning external assistance.
- Aisle space must be maintained to allow for fire protection and spill control in an emergency.
- The generator must familiarize local police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes. An example letter to assist in preparing this notification is attached. Where authorities decline to enter into arrangements, documentation of the attempt to make arrangements (e.g., certified letter requesting arrangements) must be kept on file.

### **Contingency Requirements**

- At all times, there must be at least one employee available, or on call, with the responsibility for coordinating all emergency response measures (emergency coordinator).
- The following information must be posted at the telephone closest to the hazardous waste storage area:
  - Name and telephone number of emergency coordinator(s);
  - Location of fire extinguishers, spill control material, and fire alarm; and
  - Telephone number of the fire department.
- All employees involved in waste handling and management must be thoroughly familiar with proper waste handling and emergency procedures (Records of training should be kept on file).
- The emergency coordinator must respond appropriately to emergencies as follows:
  - Fire: Call the fire department and/or attempt to extinguish it.
  - Spill: Contain the flow of waste and clean up waste and contaminated

- materials/soil to prevent or minimize release to the environment.
- For releases that threaten human health outside the facility or spills that could reach surface water: Notify the National Response Center (800/424-8802) and the Iowa Department of Natural Resources (515/281-8694).
- A Contingency Plan should be written and kept on file to document compliance with these requirements.

### **Record Keeping**

Copies of hazardous waste generation rate/storage inventories, manifests, TSN forms, hazardous waste storage area inspection logs, and employee training documentation should be maintained on file in chronological order, and be readily available for regulatory agency inspection. Copies of laboratory data documenting the hazardous/non-hazardous status of waste, contingency plans, notification of emergency response agencies, etc., should also be available for review at the facility.

**The Iowa Waste Reduction Center can assist your small business. Please contact the IWRC at 800/422-3109 for free, non-regulatory and confidential environmental assistance.**

## Notification of Small Quantity Waste Generation Activity - Example Letter

Date:

To: (Specific Individual (i.e., Fire Chief, Police Captain, Hospital Administrator by name)).

From: (Company and contact name)

Re: **Notification of Small Quantity Waste Generation Activity.**

Company name generates small quantities (less than 1000 kg/month) of hazardous waste, which is accumulated for time period before being collected by an authorized transporter. Waste generated and stored include type of waste(s).

This waste is collected and stored in our location of storage area which is located at address (see drawing). The maximum amount stored at any one time is less than number gallons.

A Material Safety Data Sheet for the original material is enclosed. Fire and health risks from the used material are expected to be similar to that of the original material.

This letter is sent in order to fulfill 40 CFR Part 262.34 (d)(4) of the Federal Hazardous Waste Regulations.

Sincerely,

Authorized Personnel

Enclosure

**Note:** Send letter by certified mail so a return receipt can document that the letter was received.