

# Hazardous Waste Management

## The Very Small Quantity Generator

Information presented in this fact sheet is intended to provide a general understanding of the regulatory requirements governing very small quantity generators of hazardous waste. This information is not intended to replace, limit, or expand upon the complete regulatory requirements found in Division 14 of the ADEM Administrative Code.

### WHAT IS A VERY SMALL QUANTITY GENERATOR?

Generators of hazardous waste are divided into three categories based upon the quantity of hazardous waste generated. If you generate less than 220 pounds of hazardous waste and no more than 2.2 pounds of acute hazardous waste in a calendar month, you are a **Very Small Quantity Generator (VSQG)** for that month. The requirements that apply to you as a VSQG are found primarily in ADEM Admin. Code r. 335-14-3-.01(4); where appropriate, that rule references other parts of ADEM Admin. Code Division 14. See ADEM's fact sheet, *Hazardous Waste: The Basics*, for additional general information regarding generators of hazardous waste.

#### TIP

For hazardous waste that has a density similar to water, twenty-six gallons (about half of a 55-gallon drum) weighs about 220 pounds

### WHAT IS A HAZARDOUS WASTE DETERMINATION?

A hazardous waste determination is the process of identifying whether any of the wastes you generate either exhibit a characteristic of hazardous waste or are found on one or more of the lists of hazardous waste. For details on how to make this determination, refer to ADEM Admin. Code r. 335-14-3-.01(2), as well as ADEM's fact sheet, *Hazardous Waste Determination*.

### SHOULD I HAVE AN EPA IDENTIFICATION NUMBER?

As a VSQG, you are not required to obtain an EPA Identification Number; however, you may obtain one, if desired, by submitting ADEM Form 8700-12 (*Notification of Regulated Waste Activity*) in accordance with ADEM Admin. Code r. 335-14-3-.01(8). If you have an active EPA Identification Number, an annual notification will be required based on the schedule found at ADEM Admin. Code r. 335-14-1-.02(1)(a).

#### TIP

If your generator category changes from month to month, you should follow the higher generator category requirements to ensure you remain in compliance.

If you have an active EPA Identification Number and wish to stop using it, you must send a letter to ADEM requesting that the number be deactivated. The deactivated number can not be used for any purpose after that point.

### WHAT ARE MY TIME AND QUANTITY ACCUMULATION LIMITS?

You are allowed to accumulate your hazardous waste on-site without having either a permit or interim status with amount of time those wastes are accumulated; however, the following quantity limits do apply:

- If you accumulate more than 2,200 pounds of hazardous waste on-site at any one time, you must manage it in accordance with the Small Quantity Generator (SQG) rules found at ADEM Admin. Code r. 335-14-3-.01(6).
- If you accumulate more than 2.2 pounds of acute hazardous waste, or more than 220 pounds of residues from a cleanup of acute hazardous waste, on-site at any one time, you must manage it in accordance with the Large Quantity Generator (LQG) rules found at ADEM Admin. Code r. 335-14-3-.01(7).

If you experience a *one-time event* that would place you in a higher generator status, you may handle that waste under the alternative standards for episodic generation found at ADEM Admin. Code r. 335-14-3-13. These standards allow you to manage waste from a one-time event without changing your generator status.

### HOW SHOULD I MANAGE MY HAZARDOUS WASTE CONTAINERS?

While there are no specific regulatory requirements regarding the management of your containers under most circumstances, suggested best management practices include:

- Use containers that are in good condition and compatible with the waste;
- Keep containers closed, except when adding or removing waste;
- Mark each container with the words "Hazardous Waste" and a description of the waste ("spent solvents" for instance);
- Inspect the area where containers are stored routinely, looking for leaks or deterioration; and
- Handle and store containers in a manner that will prevent leaks.

If you accumulate hazardous waste on-site, you should operate in a way that minimizes the possibility of fire, explosion, or spills. Also, you should be prepared to respond to emergency situations at your site. Suggested emergency preparedness actions include:

- Provide a way for employees to summon help, especially if they are working alone;

