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# CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG) 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 261.5

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

These regulations apply if your facility generates hazardous waste at a rate less than 220 pounds in any calendar month and never stores more than 2,200 pounds of hazardous waste on-site at any time. Facilities generating or storing hazardous waste in quantities greater than the above limits are subject to more stringent Small Quantity Generator (SQG) or Large Quantity Generator (LQG) regulations.

## **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. Non-compliance can result in fines of up to \$32,500 per day per violation.

## **CESQG Regulatory Requirements**

CESQG regulations are relatively lenient compared to the other sets of hazardous waste regulations and only stipulate the following requirements:

- Waste must be appropriately categorized as hazardous or non-hazardous following EPA protocol contained in 40 CFR 262.11.
- CESQGs may not generate more than 220 pounds of hazardous waste in any calendar month.
- CESQG hazardous waste must be treated or disposed of (as discussed below) before the on-site storage amount reaches 2,200 pounds.
- If the facility's hazardous waste generation rate exceeds 220 pounds in any calendar month or more than 2,200 pounds of hazardous waste is allowed to accumulate on site,

then the facility is no longer a CESQG and must comply with the more stringent set of regulations established for Small Quantity Generators (SQGs) or Large Quantity Generators (LQGs).

- CESQG hazardous waste must be treated or disposed of:
  - By an EPA-permitted hazardous waste management company,
  - At a DNR-permitted regional collection center, or
  - At a facility which beneficially uses or legitimately recycles hazardous waste.

CESQGs are not required to obtain an EPA Hazardous Waste Generator Identification Number according to federal law, but may be asked to have an ID number as a matter of policy imposed by the hazardous waste transportation/disposal company providing service. Application for an ID number is accomplished by completing the form enclosed in EPA's "Notification of Regulated Waste Activity" booklet (EPA Form 8700-12).

### **CESQG Hazardous Waste Management Recommendations**

While not required by law, the following hazardous waste management recommendations should be considered for implementation to reduce the likelihood of spills, mismanagement, adverse human and environmental effects and resulting liabilities.

- Hazardous waste should be stored in sealed containers that are clearly labeled "Hazardous Waste".
- Hazardous waste storage containers should be packaged, labeled and marked according to the Department of Transportation's (DOT) hazardous materials transport regulations.
- All shipments of hazardous waste should be accompanied by a Uniform Hazardous Waste Manifest and a Treatment Standard Notification (TSN) form (if applicable).
- Hazardous waste storage areas should be maintained and operated to minimize the possibility of fire, explosion or release of hazardous waste.
- Personnel handling hazardous waste should receive adequate training to assure they are competent to perform this activity and should have immediate access to a telephone to summon help in the event of a spill. Emergency response telephone numbers should be posted.
- Copies of laboratory data documenting the hazardous/non-hazardous status of waste, hazardous waste generation rate/storage inventories, manifests/TSN forms, proof of employee training, etc., should be maintained on file to document compliance.