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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

July 2019

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

The SQG regulations apply if your facility:

- Generates between 220 pounds (100 kg) and 2,200 pounds (1000 kg) of hazardous waste per calendar month,
- Generates more than 2.2 pounds (1 kg) of acute hazardous waste per calendar month, or
- Stores more than 2,200 pounds of hazardous waste on-site at any time.

*If any of these limits are exceeded, facilities are subject to Large Quantity Generator (LQG) regulations or may request a short-term waiver from the LQG regulation under the 'episodic event' provision discussed below.*

## *SQG On-Site Management Requirements*

- Accurately characterize each facility waste as hazardous or non-hazardous at the point/time of generation following EPA protocol contained in 40 CFR 262.11.
- Maintain an inventory of the facility's monthly hazardous waste generation rate and the amount of hazardous waste stored on site to confirm/document the SQG regulatory category is applicable.
- Obtain an EPA Hazardous Waste Generator Identification Number by completing the EPA Form 8700-12 in EPA's "Notification of Regulated Waste Activity" booklet.
- Manage hazardous wastes in compliance with applicable on-site and off-site federal regulations (40 CFR Part 262.16) including:
  - Storage in waste containers that are:
    - Compatible with the waste being stored
    - Sealed, except when adding or removing waste
    - Labeled:
      - "Hazardous Waste"
      - The type of hazard associated with the waste (i.e., Ignitable, Corrosive, Toxic, etc.)
      - Accumulation start date
  - Weekly inspection/documentation of the hazardous waste storage area to maintain leak prevention, proper container labeling and to maintain adequate access to all containers.
  - Off-site disposal through an EPA-permitted transporter/disposal facility within

180 days of the accumulation start date. (The storage time limit is extended to 270 days if the waste must be shipped 200 miles or more).

*Note – A provision termed “Satellite Accumulation” exists in 40 CFR 262.15 which allows storage of up to 55 gallons of hazardous waste at the point of generation and under the supervision of the individual generating the waste for an indefinite period of time. If using this provision, the container should be labeled as discussed above but include “Satellite Accumulation” instead of the accumulation start date. When 55 gallons has accumulated, the “Satellite Accumulation” notation should be removed and replaced with the current date, the waste must be moved to a permanent hazardous waste storage area within three days and disposed of off-site within 180 days.*

### ***SQG Off-Site Management Requirements***

- 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”
  - Container’s accumulation start date
  - Generator's name, address and EPA ID #
  - Manifest Document Number
  - EPA waste code (i.e., D001 for ignitable)
  - DOT shipping name

\*Commercially available labels can be used (i.e., Label Master Item # WM812)

Additionally, the hazardous waste transport vehicle must be affixed with the appropriate DOT placards.

- 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.

### ***SQG 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, immediate access to a device capable of summoning external assistance must be available.
- 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 regarding the types of waste handled at the facility. Documentation that such contact was made must be maintained on site and be available for inspection.

### ***SQG 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 (i.e., emergency coordinator).
- The emergency coordinator must respond appropriately to emergencies as follows:
  - Fire: Call the fire department. For small fires, trained personnel may 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 (515/725-8694).
- 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).
- A Contingency Plan should be written and kept on file to document compliance with these requirements.

## ***SQG Recordkeeping***

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.

## ***Episodic Event (40 CFR 262 Subpart L)***

- An episodic event is an activity, either planned or unplanned, that does not normally occur during generator operations and results in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the SQG category (i.e., more than 2,200 pounds in a month).
- A planned episodic event is an episodic event that the generator planned and prepared for, including regular maintenance, tank cleanouts, short-term projects, and removal of excess chemical inventory (i.e., more than 220 pounds generated in a month).
- An unplanned episodic event is an event that the generator did not plan or reasonably did not expect to occur, including production process upsets, product recalls, accidental spills, or “acts of nature,” such as a tornado, hurricane, or flood.

This aspect of the regulations allows an SQG to remain in the SQG category provided it complies with the following additional regulations:

- May only claim one planned episodic event and/or one unplanned episodic event per year.
- EPA must be notified using EPA form 8700-12 within thirty days prior to a planned event or within 72 hours following an unplanned event.
- Hazardous waste generated during the event must be shipped off-site to a permitted hazardous waste treatment, storage or disposal facility (TSDF), using a hazardous waste manifest, within 60 days.
- Episodic waste containers must be labeled “Episodic Hazardous Waste” and marked with the start date of the episodic event. Containers must also be marked with the type of hazard associated with the waste and applicable RCRA waste code(s) (i.e., D001 for ignitable waste).
- The SQG must maintain records of the event and manage the episodic hazardous waste in a manner that minimizes the possibility of fire, explosion, or release.

Note – Beginning on September 1, 2021, and every 4 years thereafter, SQGs must re-notify EPA of their hazardous waste generation status and current contact information using EPA Form 8700-12.

**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.**