
VERY SMALL QUANTITY GENERATOR (VSQG) OF HAZARDOUS WASTE

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

40 CFR Part 262

July 2019

Do these regulations apply to my operation?

The VSQG regulations apply if your facility:

- Never generates more than 220 pounds (100 kg) of hazardous waste in any calendar month,
- Never generates more than 2.2 pounds (1 kg) of acute hazardous waste in any calendar month, and
- Never 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 either the more stringent Small Quantity Generator (SQG) or Large Quantity Generator (LQG) regulations or may request a short-term waiver from the SQG/LQG regulations under the 'episodic event' provision.

VSQG 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 VSQG regulatory category is applicable.
- Manage hazardous wastes in compliance with applicable on-site and off-site federal regulations (40 CFR Part 262.14) including:
 - Clearly labeling hazardous waste storage containers "Hazardous Waste," and with an indication of the hazards associated with the waste (i.e. ignitable, corrosive, toxic, etc.) placard/diamond (i.e., Flammable, Corrosive, Toxic, etc.).
 - Containers must also be marked with the applicable RCRA waste code(s) (i.e., D001 for ignitable waste) prior to off-site transport to a disposal facility.
 - Treatment or disposed of hazardous waste:
 - By an EPA-permitted hazardous waste management company,
 - At a DNR-permitted regional collection center,
 - At a facility which beneficially uses or legitimately recycles hazardous waste, or
 - By consolidation at an LQG that has the same owner/operator as the VSQG.

Note - VSQGs 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 RCRA Subtitle C Activity" booklet (EPA Form 8700-12) and is available for downloading online.

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 VSQG category (i.e., more than 220 pounds in 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.
- An unplanned episodic event is an episodic 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 a VSQG to remain in the VSQG 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.
- Obtain an EPA Identification Number using EPA Form 8700-12 (As stated previously, a VSQG are not required to obtain an EPA Identification Number if it is not utilizing the episodic event provisions).
- 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 an indication of the hazards associated with the waste and the applicable RCRA waste code(s) (i.e., D001 for ignitable waste).
- The VSQG must maintain records of the event and manage the episodic hazardous waste in a manner that minimizes the possibility of a fire, explosion, or release.

VSQG 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 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 aware of the hazards associated with management of hazardous and perform this work safely.
- Personnel should have immediate access to communication means to summon help in the event of a spill. Emergency response telephone numbers should be posted at hazardous waste storage areas.
- Copies of laboratory data documenting the hazardous/nonhazardous status of waste, hazardous waste generation rate/storage inventories, off-site disposal documents (i.e., manifests), proof of employee training, etc., should be maintained on file and be readily available for review.
- Weekly inspections of hazardous waste storage areas.

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.