

# Some General Notes to Help you Fill Out the SQG Form

Most of the questions on the form are self-explanatory. However, for some of the questions, a few additional tips may be helpful. If you have questions on a particular question, and you don't see it referenced below, please visit our website at [www.des.nh.gov](http://www.des.nh.gov) or call us at 1-866-HAZ-WAST (429-9278 in-state only).



## Section C: RCRA C Site Identification Form (Notification Form)

If you no longer generate hazardous waste or **only** generate used oil and/or universal waste for recycle, **and** you no longer have waste on site that you need to dispose of, then you can "declassify" the EPA ID #. If this is the situation, please note any details in item 12 of the *RCRA C Site Identification Form* (enclosed yellow Notification Form) or complete a *NH Hazardous Waste Declassification Form*. By doing this the EPA ID # can be declassified. A declassified number can be reactivated if the facility adds a process that generates hazardous waste in the future, but DES must be notified of this change. Please note that if you have a used oil burner, you must indicate that you burn your used oil on the yellow Notification Form.

## Section D: Waste Generation and Waste Type

1. This applies to hazardous waste only. Do not list other wastes, such as universal waste (batteries, fluorescent lamps, mercury containing devices, CRTs, and anti-freeze) for recycle, used oil and used oil filters for recycle, medical waste, and tires. If you have a question regarding any waste that you generate, please call (603) 271-6425.
2. Quantity of waste: Please provide information (in kilograms or pounds) for actual hazardous waste generated in the most recent 12 months. For example if you received this form in October 2010, review your activities back to October 2009. If you did nothing during that any month in that time period, write "0" or "none" in the table. Please do not put the quantity shipped or an average in this section, the actual generation rate per month should be recorded in this section.
3. Waste Determination: As a business owner, it is your responsibility to know whether the waste generated by your operation is hazardous or whether it can be managed as non-hazardous (for example, placed in a dumpster). This question seeks to find out how you make that decision. Have you had a laboratory test the waste to determine whether or not it is hazardous? Do you use your knowledge or consult a material safety data sheet (MSDS)? Do you rely on your vendor to tell you?

## Section E: Storage Requirements

### **Storage Requirements - Notes about Containers and Tanks**

"Container" includes any pail, bucket, drum, or other portable vessel that can be moved; "Tank" includes any stationary device that is permanently affixed to the floor or is otherwise not moveable.

"Good Condition" means free of any condition that could lead to a discharge of the contained waste, including, but not limited to, cracks, holes, leaks, corrosion, dents, rust, and bulges or other signs of pressure build-up. All storage containers and tanks must be in good condition.

"Compatible" means the waste does not damage the structural integrity of the unit holding the waste.

"Impervious Surface" means flooring or other surface that is impenetrable by liquids; for example, cement and asphalt (provided it is not cracked or damaged). Wooden or dirt flooring would not be considered impervious. All hazardous waste must be stored on an impervious surface.

"Secondary Containment" means an impervious berm or other containment structure in which the individual containers or tanks of hazardous waste are placed or affixed in order to contain a leak if one were to occur. All containers stored near floor drains or outside must have secondary containment.

### **Storage Requirements - Notes about Labeling**

The words "Hazardous Waste" must be written on each hazardous waste container.

"Specific Identification" means that the contents must be marked on the container, for example, "waste 1,1,1-trichloroethane" or "paint related waste." This must be written on each container.

## Section F: Recordkeeping Requirements

All facilities are required to submit a photocopy to DES of each manifest (signed by the facility and the transporter) used to ship hazardous waste within 5 days of each shipment. This is the facility's responsibility, not the transporter, to ensure that a copy gets sent to DES at the time of the shipment. If you are unsure if a copy is being submitted by you, please contact DES by email or telephone.

# Frequently Asked Questions



## What is the purpose of this Certification?

This certification form is for Small Quantity Generators (SQGs) of hazardous waste to use when certifying to the NH Department of Environmental Services that their company is in compliance with applicable hazardous waste rules. The self-certification program is required under RSA 147-A:5, IV, NH Hazardous Waste Law. The intent of the SQG Program is to increase the awareness, knowledge, and compliance rates of SQGs. The law requires SQGs to review their hazardous waste procedures, conduct an inspection of their facility, and certify compliance to DES.

## Who must submit this Certification?

Each generator of hazardous waste that generates one drop to less than 220 pounds (100 kilograms) of hazardous waste in each and every month of its operation must submit this form to DES once every three years, together with the fee.

## What is the fee?

SQGs must submit a fee of \$90 per year, payable every three years at the time of certification. If you are **renewing** your self-certification (SQG Form) the associated fee is \$270. A fee increase from \$60 per year to \$90 per year was established by the Legislature, effective July 1, 2007. If this is an initial submittal, the fee may differ, as all generators are responsible for retroactive fees.

## How do I know if I have a hazardous waste?

By testing the final waste or using your knowledge of the process that created it. A good rule of thumb is that if you are using your EPA ID # and a manifest, there is the strong likelihood that you are a hazardous waste generator.

## I generate one gallon a month of hazardous waste. Do I have to be part of the program?

Yes. If you generate or have hazardous waste on site, you will need to complete the form and pay the fee.

## I just have a parts washer in my auto repair garage? Do I have to comply with the requirements?

If you are using a hazardous parts cleaner, then the resultant waste will be hazardous and you must comply. If you are using a non-hazardous parts cleaner, it could become contaminated with hazardous waste. The waste (not the original solvent) should be tested or you should have proof based on generator knowledge documenting that the waste solvent is non-hazardous prior to disposal.

## I no longer generate hazardous waste. Should I fill out the forms?

Yes. If your company no longer generates hazardous waste, please check and follow the instructions in Sections B.3. **and** C of the SQG Form. Please also provide a comment in Item 12 of *RCRA C Site Identification Form* (Notification Form) or complete a *NH Hazardous Waste Declassification Form* identifying that you no longer generate hazardous waste and the reason for the change.

## I generate only used oil that is recycled, do I need to comply with the program?

No\*. If used oil is truly the only hazardous waste you produce (other than universal waste) and it is being recycled and managed appropriately, please check and follow the instructions in Sections B.1. **and** C of the SQG Form. Please also provide a comment in Item 12 of the Notification Form identifying that you are only generating used oil for recycle. In addition, if you are recycling your used oil by burning it on-site, please check that in Item 9.C.3 of the Notification Form. \***Please note** that if you are generating any oil other than automotive oil, you must conduct an initial used oil determination to ensure that your oil is not hazardous waste.

## What's a universal waste and are they exempt from the program?

"Universal Wastes" include waste antifreeze, mercury-containing devices, fluorescent lamps, batteries and cathode ray tubes (CRTs). Although SQGs are subject to the Universal Waste Rule, they do not need to count universal waste towards their hazardous waste generator status as long as it is being managed appropriately and is being recycled. If universal waste is truly the only hazardous waste you produce (other than used oil), please check and follow the instructions in Sections B.1. **and** C of the SQG Form.

## Does my municipal government need to comply? How about public school districts?

Yes, if they generate small quantities of hazardous waste. Both are political subdivisions and are exempt from the fee. Please note that State Agencies are not exempt from the fee.

## Where can I get a copy of the NH Hazardous Waste Rules?

You can order a copy by telephone at (603) 271-2975 or download through [www.des.nh.gov](http://www.des.nh.gov).