

Hazardous Waste Generator Classification

Small Quantity Generator (SQG) v. Full Quantity Generator (FQG)

Requirements pertaining to the handling of hazardous wastes are dependent on the quantity of hazardous waste generated during a specific time period. Generators of hazardous waste are placed in 1 of 3 classes: SQG, SQG Extended Storage and FQG.

| SQG | SQG Extended Storage | FQG |
|--|--|---|
| Never generates more than 220 pounds of hazardous waste/month or 2.2 pounds of an acutely hazardous waste/month. | Never generates more than 220 pounds of hazardous waste or 2.2 pounds of an acutely hazardous waste in 1 month. Upon reaching 2200 pounds, all waste must be shipped within 90-days. | Generates greater than 220 pounds of hazardous waste or 2.2 pounds of an acutely hazardous waste in any month. Wastes must be shipped within 90-days of accumulation date except wastes in satellite storage areas. |

Waste Reduction and Change of Generator Classification

Small Quantity Generator (SQG) v. Full Quantity Generator (FQG) Requirements

| Requirement | SQG | SQG Extended Storage | FQG |
|--|--|--|--|
| Hazardous waste determination (Env-Hw 502.01) | X | X | X |
| Notification (Env-Hw 504.01) | X | X | X |
| EPA ID number (Env-Hw 505.01) | X | X | X |
| Safe storage practices - no hazard to human health or the environment (Env-Hw 506.01) | X | X | X |
| Appropriate containers or tanks; closed at all times (Env-Hw 507.01) | X | X | X |
| Impervious surface (Env-Hw 507.01) | X | X | X |
| No floor drains or secondary containment when floor drains are present (Env-Hw 507.01) | X | X | X |
| Outside: 50 feet from surface water, 75 feet from private wells, protective radius of public water supply 50 feet from storm drains (Env-Hw 507.01) | X | X | X |
| Outside: secondary containment of 110% capacity of largest container, containers and secondary containment covered from precipitation (Env-Hw 507.01) | X | X | X |
| Spill control equipment | X (Env-Hw 508.02) | X | X |
| Fire control equipment | X (Env-Hw 508.02) | X | X |
| “No Smoking” signs near ignitable wastes | X (Env-Hw 508.02) | X | X |
| 2 feet of aisle space | X (Env-Hw 508.02) | X | X |
| Labeling – words “Hazardous Waste”, identity of container’s contents, and EPA or state waste number (Env-Hw 507.03) | X | X | X |
| Storage time limits | None if waste never exceeds 220 pounds of hazardous waste or 2.2 pounds of an acutely hazardous waste (Env-Hw 508.02). | 90-Days once reach 2200 pounds (Env-Hw 508.03) | 90-Days (Env-Hw 507.02) except for satellite areas |

Continued

| Requirement | SQG | SQG Extended Storage | FQG |
|--|--------------|---|---|
| Emergency posting | Not Required | X (Env-Hw 508.03) | X (Env-Hw 509.02) |
| Labeling – accumulation date | Not Required | Date over 2200 pounds (Env-Hw 508.03) | Beginning accumulation date (Env-Hw 507.03) or if satellite, date container is full (Env-Hw 509.03) |
| Weekly inspections (containers); daily inspections (tanks), and inspection logs | Not Required | X (Env-Hw 508.03) | X (Env-Hw 509.02) |
| Internal communication or alarm system; external communication access | Not Required | X (Env-Hw 508.03) | X (Env-Hw 509.02) |
| Arrangements with authorities and emergency response personnel | Not Required | X (Env-Hw 508.03) | X (Env-Hw 509.02) |
| Hazardous waste training | Not Required | Familiar w/ waste handling and emergency procedures (Env-Hw 508.03) | X (Env-Hw 509.02) |
| Hazardous waste must be under the control of a designated hazardous waste manager or emergency coordinator | Not Required | X (Env-Hw 508.03) | Contingency Plan |
| One employee on call or on-site | Not Required | X (Env-Hw 508.03) | Contingency Plan |
| Contingency plan | Not Required | Not required | X (Env-Hw 509.02) |

Training

| Generator Status | Training Requirements |
|----------------------|---|
| SQG | None |
| SQG Extended Storage | All employees must be thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities. |
| FQG | FQGs must provide personnel training in hazardous waste management by an outside trainer or adequately trained in-house employee. Employees must be trained within 6 months of employment or reassignment; employees must not work unsupervised until they have completed the training. Employees must receive training annually. A FQG must maintain the following documents on-site: Job title and name of employee filling that position for each position related to hazardous waste management, written job descriptions, a written description of the type and amount of training each employee receives, records that document that the required training has been completed, training records must be kept until facility closure or three years on former employees. |

Contingency Plan

Full Quantity Generators are required to have a contingency plan for their facility. The contingency plan must be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

The contingency plan must describe the actions facility personnel must take in response to fires, explosions or releases. The contents of the contingency plan must be as described in 40 CFR 265.52 and must comply with 40 CFR 265.51 and 40 CFR 265.56.