



SUMMARY OF REQUIREMENTS FOR VERY SMALL QUANTITY GENERATORS (VSQGs)



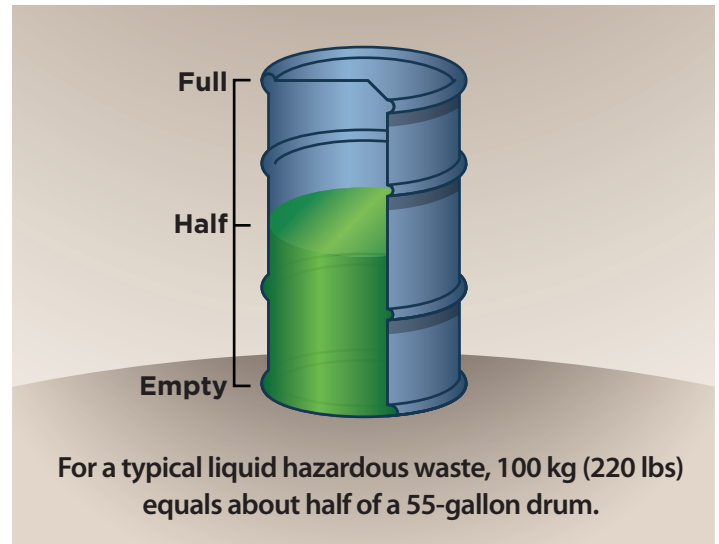
If you generate no more than 100 kg (220 lbs) of hazardous waste and no more than 1 kg (2.2 lbs) of acute hazardous waste per month, you are a VSQG. As a VSQG, you must comply with three basic waste management requirements.

First, you must identify all hazardous waste that you generate. Second, you may not store more than 1,000 kg (2,200 lbs) of hazardous waste or 1 kg (2.2 lbs) of acute hazardous waste on site at any time. Finally, you must ensure delivery of your hazardous waste to an off-site treatment or disposal facility that is one of the following (or if you treat or dispose of your hazardous waste on site, your facility also must be):

- A state or federally regulated hazardous waste treatment, storage, or disposal facility (TSDF).
- A facility permitted, licensed, or registered by a state to manage municipal or industrial solid waste.
- A facility that uses, reuses, or legitimately recycles the waste (or treats the waste prior to use, reuse, or recycling).
- A universal waste handler or destination facility subject to the universal waste requirements of 40 CFR Part 273. Universal wastes are hazardous wastes such as batteries, recalled and collected pesticides, mercury-containing thermostats and other equipment, mercury-containing lamps, or aerosol cans.

STATE REQUIREMENTS

Some states have additional requirements for VSQGs. For example, some states require VSQGs to follow some of the Small Quantity Generator (SQG) requirements, such as obtaining EPA identification numbers or complying with storage standards. See page 13 of ***Managing Your Hazardous Waste: A Guide for Small Businesses*** (www.epa.gov/hwgenerators/managing-your-hazardous-waste-guide-small-businesses) for SQG storage requirements.



- A Large Quantity Generator (LQG) under the control of the same company as the VSQG, provided the VSQG marks its containers with the words "Hazardous Waste" and the hazards of the container's contents (e.g., using the words ignitable, corrosive, toxic, or reactive or another nationally recognized hazard label).
- For hazardous waste pharmaceuticals, a reverse distributor or healthcare facility operating under the appropriate sections of the Hazardous Waste Pharmaceuticals Rule in 40 CFR Part 266 Subpart P.
- For airbag waste, an airbag waste collection facility or designated facility operating under 40 CFR section 261.4(j).

BEST PRACTICE

It's a good idea to call the appropriate implementing agency to verify the TSDF you have selected has the necessary permits, etc. You also may want to confirm that the facility fits into one of the bulleted categories listed on front page. Make sure to document your efforts to confirm these facts in your records.

WASTE CONSOLIDATION FROM VSQGS

If you are a VSQG that is part of a larger company, you may be able to reduce your overall environmental liability, improve the management of your hazardous waste, and reduce overall waste management costs by consolidating your VSQG hazardous waste at an LQG within your company. First, check with your state to see if it has adopted the VSQG-LQG consolidation provision from EPA's 2016 Generator Improvements Rule. If your LQG location is in a different state, both states must adopt the consolidation regulations before you may use this provision. All VSQGs and the LQG must be under the control of the same company to participate in this consolidation option.

To begin consolidating, the LQG would notify the implementing agency that it plans to consolidate its VSQG waste at its facility using the EPA Site ID Form. This notification must be submitted at least 30 days before receiving the first shipment from one of its VSQGs. The LQG would also fill out the addendum to the Site ID Form listing the VSQGs that are participating in the program.

All the participating VSQG needs to do is mark its containers with the words "Hazardous Waste" and proper indication of the hazards of the contents. It would then ensure delivery of its waste to the LQG location, making sure it stays within the overall accumulation limit for VSQGs (less than 1,000 kg of non-acute hazardous waste or 1 kg of acute hazardous waste). The LQG would then manage the VSQG waste along with its own generated hazardous waste following all LQG requirements.

RESOURCES

- Main Hazardous Waste Generators webpage: www.epa.gov/hwgenerators
- Site ID Form: www.epa.gov/hwgenerators/how-hazardous-waste-generators-transporters-and-treatment-storage-and-disposal
- Managing Your Hazardous Waste: A Guide for Small Businesses: www.epa.gov/hwgenerators/managing-your-hazardous-waste-guide-small-businesses
- Hazardous Waste Generator Regulations: www.epa.gov/hwgenerators/hazardous-waste-generator-regulatory-summary