

# Hazardous Waste Counting

Craig Jorgensen May 2023



UTAH DEPARTMENT of  
ENVIRONMENTAL QUALITY  
**WASTE MANAGEMENT  
& RADIATION CONTROL**

# R315-262-11: Hazardous Waste Determination

01

Accurate Determination

02

Made at the Point of Generation

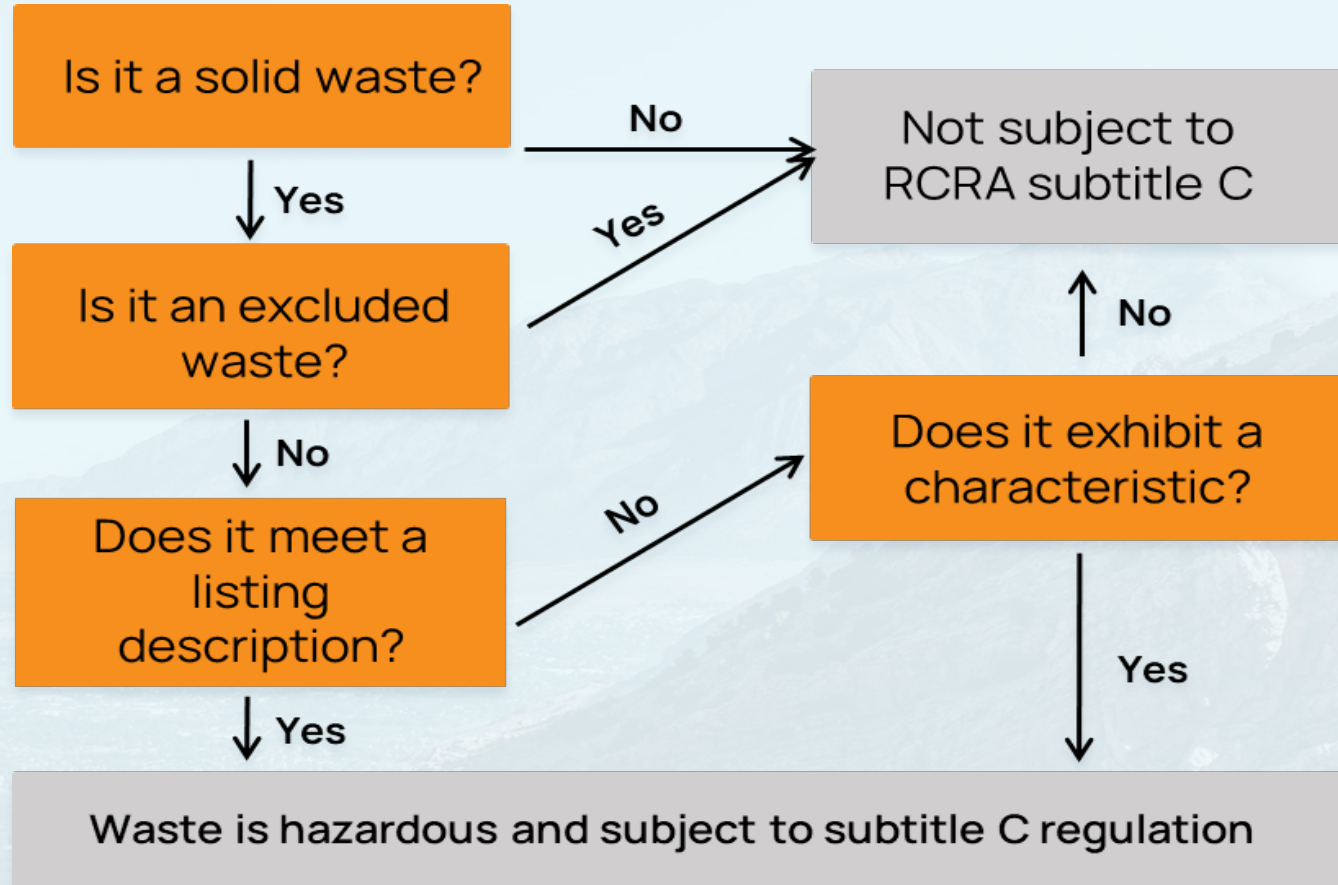
03

Before Dilution, Mixing, Other Alteration

04

Any Time the Waste Has or May Have Changed its Properties

# Hazardous Waste Determination





# | Point of Generation

- In general, the point of generation is that point where a material first meets the definition of a “solid waste.”
- A “solid waste” includes any solid, semi-solid, liquid, or contained gaseous material that is intended to be discarded.
- The moment you decide a material is destined to be discarded, it is a solid waste.
- That moment is the “point of generation,” at which point you must determine if it is a hazardous waste.



# Point of Generation

## Hazardous Waste Determination Point of Generation Examples

- When a waste-containing material is spent and a decision is made to discard or recycle it
- When a decision is made to discard a P-or U-listed chemical
- When the waste exits a manufacturing process unit
- When a treatment residue exits a treatment unit, such as an incinerator
- When a hazardous sludge is deposited in a waste management unit, such as an impoundment
- When a residue exits a unit that that is exempt from RCRA permitting requirements
  - (e.g., a recycling unit, wastewater treatment unit, elementary neutralization unit or totally enclosed treatment unit)

# Point of Generation

Remember discarded material is a solid waste.  
Let's review the four categories of "discarded materials" identified by the EPA.

1. Garbage, refuse, and sludge.
2. Materials that are thrown away, abandoned, or destroyed.
3. A spent material is any material that has been used and, as a result of contamination, can no longer serve the purpose for which it was produced without undergoing regeneration, reclamation, or reprocessing R315-261-1(C)(1) UAC).
4. Tars, residues, slags, and other materials that are incidentally generated as part of the manufacturing or mining process.



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# Point of Generation



Identifying the point of generation is sometimes difficult, due to the many site-specific factors that affect how and when the waste is generated.

For this reason, when a generator is having difficulty identifying the point of generation, it can be a good idea to obtain a site-specific determination from the State or implementing agency.

GENERATOR CATEGORY IS  
BASED ON MONTHLY  
GENERATION





	A	B	C	D	E	F	G	H	I	J	K
1	<p><b>Instructions:</b> Use this sheet to track and calculate the total weight of nicotine waste accumulated in a month and currently on site. <b>We recommend printing this sheet and keeping it next to the waste containers, but you can also create an electronic copy for your own use by going to File and selecting "Make a copy" or "Download".</b> The weight of nicotine waste can be calculated using one of two online calculators available at <a href="http://ecigwaste.utah.gov">ecigwaste.utah.gov</a>. A description of applicable requirements is also available at <a href="http://ecigwaste.utah.gov">ecigwaste.utah.gov</a>, where an exceedance of <b>1 kg (2.2 lbs)</b> of nicotine waste accumulated in a month triggers increased regulatory requirements. For questions, contact the Utah Division of Waste Management &amp; Radiation Control at (801)536-0200</p>										
2			# of E-Cigarettes Accumulated in the Month	Volume of Nicotine Waste Accumulated in the Month in mL (if Known)	Weight of Nicotine Waste Accumulated in the Month (Use Online Calculator #1 or #2 @ <a href="http://ecigwaste.utah.gov">ecigwaste.utah.gov</a> )	Total # of E-Cigarettes Accumulated and Currently On Site	Total Volume of Nicotine Waste Accumulated and Currently On Site in mL (If Known)	Total Weight of Nicotine Waste Accumulated and On Site (use online calculator #1 or #2 @ <a href="http://ecigwaste.utah.gov">ecigwaste.utah.gov</a> )	Date Logged	Logged By (First and Last Name)	
3	Year	Month									
4	2022	January	6	Unknown	0.06	30	Unknown	0.31	1/21/22	Jessie Doe	Example
5											
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# Generator Category

## Monthly Generation

A gallon of water weighs 8.33 pounds

A 55 G drum of water weighs about 458 pounds

## Categories

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- ✓ 1/2 drum = VSQG
- ✓ >27 gallons = SQG
- ✓ 4 drums = SQG
- ✓ 5 drums = LQG



# Generator Category

- Any waste that meets the definition of hazardous waste in UAC R315-261 and is not exempt from regulation must be counted toward your generator category.
- Please review the regulations at UAC R315-262.11 for how to make a hazardous waste determination.
- Be sure to include in your counted wastes that are accumulated on site for any time before disposal or recycling, placed directly into an on-site treatment or disposal unit, or generated as still bottoms or sludges and removed from storage tanks.
- UAC R315-262.13(C) identifies the wastes that are not included in the monthly determinations.



UAC R315  
Parts 261 & 262

# Questions?



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Additional Questions? Contact Us!