HAZARDOUS WASTE GENERATOR CATEGORIES

GENERATOR CATEGORIES
R315-262-13(b)(4)

Quantity of acute hazardous waste generated in a calendar month	Quantity of non-acute hazardous waste generated in a calendar month	Quantity of residues from a cleanup of acute hazardous waste generated in a calendar month	Generator category
Any Amount	Any amount	Any amount	Large quantity generator
≤ 1 kg ≤ 2.2 lbs	> 100 kg and < 1,000 kg > 220 lbs and < 2,200 lbs	≤ 100 kg ≤ 220 lbs	Small quantity Generator
≤ 1 kg ≤ 2.2 lbs	≤ 100 kg ≤ 220 lbs	≤ 100 kg ≤ 220 lbs	Very small quantity generator

Generator Category Accumulation Onsite

VSQGs can accumulate 2,200 lbs at any one time – 264 gallons

SQGs can accumulate 13,228 lbs at any one time – 1,588 gallons

LQGs – no limit on quantity

One gallon of water weighs 8.33 pounds. One 55-gallon drum of water weighs about 458 pounds.

- ½ drum = VSQG
- >27 gallons = SQG
- 4 drums = SQG
- 5 drums = LQG

Generator Category Exercise

chemical	density (lbs/gal)	VSQG Monthly 220 lbs to gal	VSQG total 2200 lbs to gal	VSQG total in 55gal drums	SQG Monthly 2200 lbs to gal	SQG Monthly (drums)	SQG total 13228 lbs to gal	SQG total in 55 gal drums
gasoline	6.30	34.9	349.2	6.3	349.2	6.3	2099.7	38.2
acetone	6.64	33.1	331.3	6.0	331.3	6.0	1992.2	36.2
methyl ethyl ketone (MEK)	6.74	32.6	326.4	5.9	326.4	5.9	1962.6	35.7
isopropyl alcohol (IPA)	6.82	32.3	322.6	5.9	322.6	5.9	1939.6	35.3
toluene	7.18	30.6	306.4	5.6	306.4	5.6	1842.3	33.5
water	8.33	26.4	264.1	4.8	264.1	4.8	1588.0	28.9
glacial acetic acid	8.74	25.2	251.7	4.6	251.7	4.6	1513.5	27.5
hydrochloric acid	9.83	22.4	223.8	4.1	223.8	4.1	1345.7	24.5
methylene chloride	10.52	20.9	209.1	3.8	209.1	3.8	1257.4	22.9
nitric acid	11.70	18.8	188.0	3.4	188.0	3.4	1130.6	20.6
trichloroethylene (vinyl chloride)	12.51	17.6	175.9	3.2	175.9	3.2	1057.4	19.2
perchloroethyle/tetrachloroethylene	13.46	16.3	163.4	3.0	163.4	3.0	982.8	17.9
sulfuric acid	15.30	14.4	143.8	2.6	143.8	2.6	864.6	15.7

F020	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tri- or tetrachlorophenol, or of intermediates used to produce their pesticide derivatives. (This listing does not include wastes from the production of Hexachlorophene from highly purified 2,4,5-trichlorophenol.)	(H)
F021	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of pentachlorophenol, or of intermediates used to produce its derivatives	(H)
F022	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tetra-, penta-, or hexachlorobenzenes under alkaline conditions	(H)
F023	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used for the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tri- and tetrachlorophenols. (This listing does not include wastes from equipment used only for the production or use of Hexachlorophene from highly purified 2,4,5-trichlorophenol.)	(H)
F026	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used for the manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tetra-, penta-, or hexachlorobenzene under alkaline conditions	(H)
F027	Discarded unused formulations containing tri-, tetra-, or pentachlorophenol or discarded unused formulations containing compounds derived from these chlorophenols. (This listing does not include formulations containing Hexachlorophene synthesized from prepurified 2,4,5-trichlorophenol as the sole component.)	(H)

Hazardous waste #	Chemical abstracts #	Substance
P003	107-02-8	Acrolein
P015	7440-41-7	Beryllium powder
P042	51-43-4	Epinephrine
P063	74-90-8	Hydrogen cyanide
P089	56-38-2	Parathion
P094	298-02-2	Phorate
P095	75-44-5	Phosgene
P105	26628-22-8	Sodium azide
P106	143-33-9	Sodium cyanide
P108	157-24-9	Strychnine, & salts
P001	181-81-2	Warfarin, & salts, when present at concentrations greater than 0.3%
P064	624-83-9	Methyl isocyanate
P075	154-11-5	Nicotine, & salts (this listing does not include patches, gums and lozenges that are FDA-approved over-the-counter nicotine replacement therapies).
P081	55-63-0	Nitroglycerine (R)

VSQGs
(Very Small Quantity Generators)

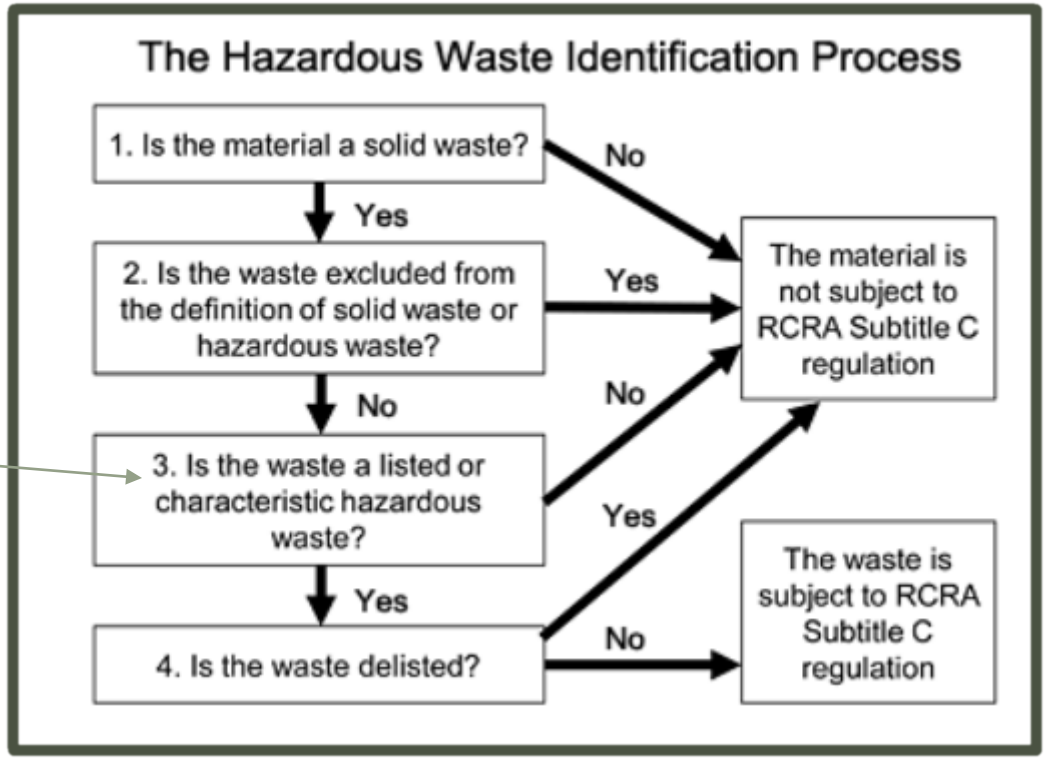
Very Small Quantity Generator

Utah Administrative Rule (UAC) R315-262-14

VSQG Must:

- Identify its hazardous waste (make a waste determination)
- Store no more than 1,000 kg (2,200 lbs) of hazardous waste or 1 kg (2.2 lbs) of acute HW onsite at any time.
- Ensure delivery to an off-site treatment, storage, or disposal facility authorized to manage VSQG waste.

Hazardous Waste Determination



The "list" can be found at UAC R315-261-31.

UTAH DEPARTMENT of ENVIRONMENTAL QUALITY
WASTE MANAGEMENT & RADIATION CONTROL

Disposing of VSQG Hazardous Waste UAC R315-262-14

- Hazardous waste treatment, storage or disposal facility.
- Municipal or industrial solid waste management facility.
- Facility that uses, reuses or recycles the waste.
- Universal Waste handling facility (for universal waste).
- Consolidate to a Large Quantity Generator under the control of the same person as the VSQG.

VSQG Consolidation Option UAC R315-262-14(a)(5)(viii) & R315-262-17(f)

There are additional requirements when VSQG's consolidate their waste at a LQG that is under control of the same person.

Shipping VSQG Hazardous Waste

- **Must comply with all DOT requirements:**
  - Marking, Placarding, Shipping papers
- **Shipping on an electronic manifest:**
  - If your transporter uses e-manifests, you may need an EPA ID number. To get an EPA ID number, complete form 8700-12 and send it to Kaci McNeill (kmcneill1@utah.gov)

Labeling Requirements

IGNITABLE

CORROSIVE

REACTIVE

TOXIC

Hazard Characteristic | DOT Shipping Labels | OSHA GHS Pictograms | NFPA 704 Labels

SQGs (Small Quantity Generators)

SQG Requirements
UAC R315-262-16

Waste Generation and Storage Limits

- Generate more than 220 lbs (100 kg) but less than 2,200 lbs (1,000 kg) hazardous waste in a month
- Generate up to 2.2 lbs (1kg) pounds acute hazardous waste in a month.
- No more than 13,228 pounds (6,000 kg) of hazardous waste onsite.
- May accumulate onsite for 180 days or 270 days if transported more than 200 Miles.

Generator Category Exercise

Chemical	Density (lbs/gal)	SQG monthly 2,200 lbs to gal	SQG monthly (drums)	SQG total 13, 228 lbs to gal	SQG total in 55-gal drums
gasoline	6.3	349.2	6.3	2099.7	38.2
acetone	6.64	331.3	6.0	1192.2	36.2
methyl ethyl ketone (MEK)	6.74	326.4	5.9	1962.6	35.7
isopropyl alcohol	6.82	322.6	5.9	1939.6	35.3
toluene	7.18	306.4	5.6	1842.3	33.5
water	8.33	264.1	4.8	1588.0	28.9
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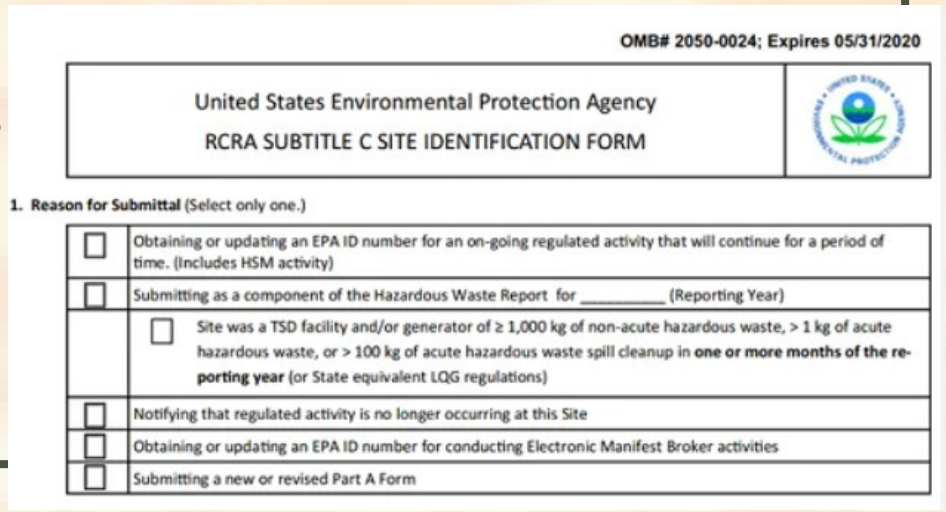
trichloroethylene (vinyl chloride)	12.51	175.9	3.2	1057.4	19.2
perchloroethle/twtrachloroethylene	13.46	163.4	3.0	982.8	17.9
sulfuric acid	15.3	143.8	2.6	864.6	15.7

SQG Requirements
UAC R315-262-16

- EPA identification number
- Hazardous waste transporter and TSDF
- Re-notification



OMB# 2050-0024; Expires 05/31/2020

United States Environmental Protection Agency

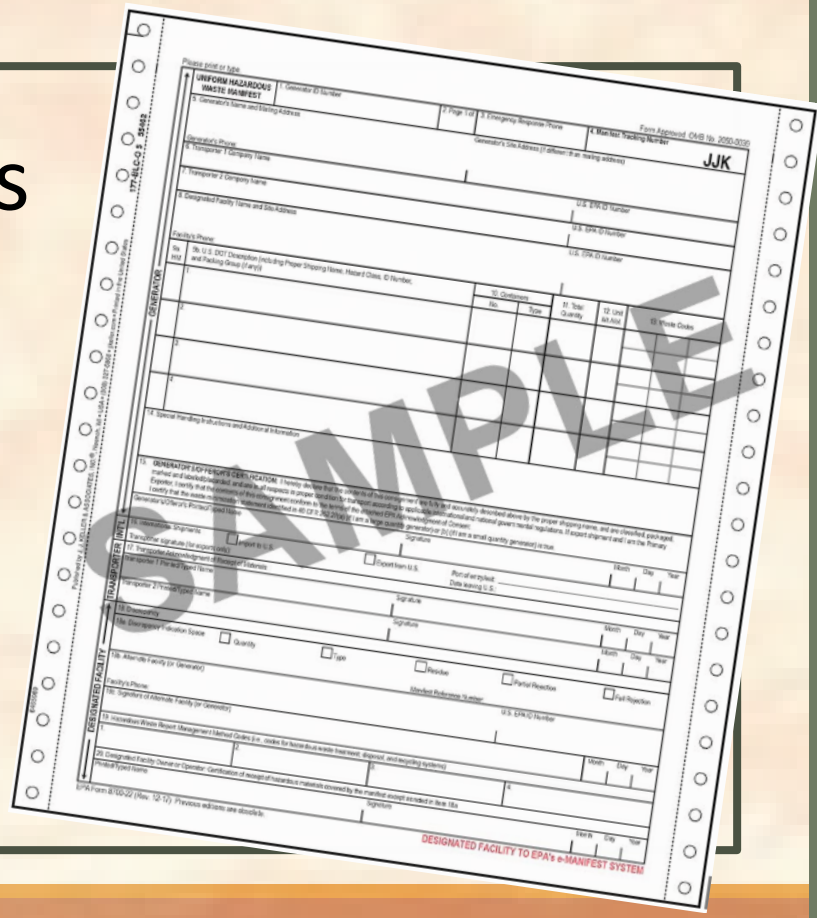
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. **Reason for Submittal** (Select only one.)

☐	Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
☐	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
☐	Site was a TSD facility and/or generator of ≥ 1,000 kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in **one or more months of the reporting year** (or State equivalent LQG regulations)
☐	Notifying that regulated activity is no longer occurring at this Site
☐	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
☐	Submitting a new or revised Part A Form

SQG Requirements
UAC R315-262-20, R315-262-40, and R315-262-42

- Manifest Requirements
- Use E*Manifest
- Recordkeeping
- Exception Reporting



SQG Requirements for containers UAC R315-262-16

- Must be compatible with the waste and in good condition.
- Containers must be kept closed.
- Label containers with the words “Hazardous Waste” and an Indication of the Hazards of the Contents.
- Do not handle or store containers so that they might rupture, leak, or be damaged.
- Inspect Central Accumulation Areas weekly.

Acceptable Open Container

Closed Container

Labeling Requirements

IGNITABLE

CORROSIVE

REACTIVE

TOXIC

Hazard Characteristic | DOT Shipping Labels | OSHA GHS Pictograms | NFPA 704 Labels

UTAH DEPARTMENT of ENVIRONMENTAL QUALITY
WASTE MANAGEMENT & RADIATION CONTROL

AISLE SPACE

Inadequate

Adequate

SQG Requirements
UAC R315-262-16

Accumulation of Incompatible Wastes

- Not placed in same or unwashed containers.
- Separated by a dike, berm, wall or other device.

SQG Requirements for containers UAC R315-262-16

1. Make a waste determination.
2. Do not mix incompatible wastes.
3. Use the correct type of container.
4. Mark the words “Hazardous Waste” and the accumulation start date on the container.
5. Remove all previous markings on the container before use.
6. Keep containers in good condition.
7. Physically separate incompatible wastes.
8. Inspect container storage weekly.

SQG Requirements for Central Accumulation Area (CAA) UAC R315-262-16(b)

The 180/270-Day Areas or CAA

- Containers
  - Labeling
  - Inspect Weekly
  - Preparedness & Prevention
  - Emergency Procedures
  - Training

SQG Preparedness and Prevention UAC R315-262-16(b)(8)

Areas where HW is generated or accumulated must be equipped with:

- Internal communication or alarm system
- Device capable of summoning emergency assistance
- Portable fire extinguishers
- Spill control and decontamination materials
- Water at adequate volume and pressure
  - Must test and maintain all equipment
  - Must have sufficient aisle space

Are you prepared to respond to a hazardous waste emergency?

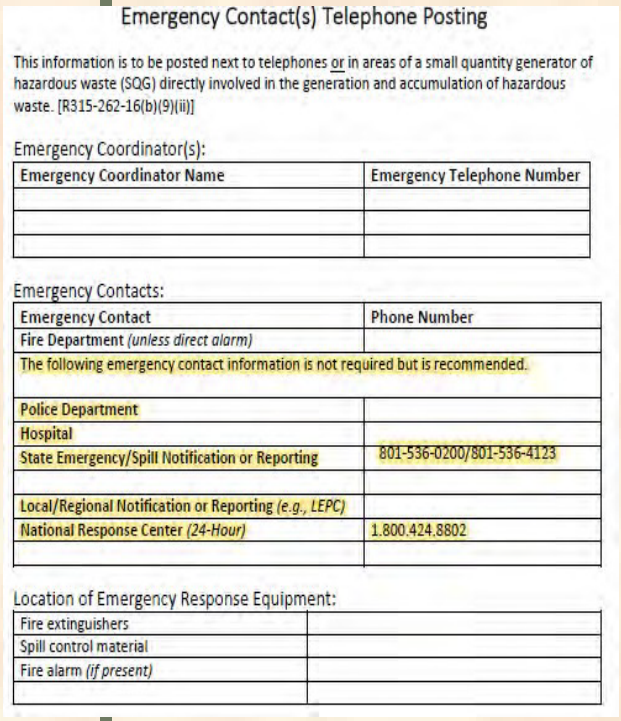
SQG Preparedness and Prevention UAC R315-262-16(b)(8)(vi)

- Notify local fire, police, emergency response teams and hospitals or Local Emergency Planning Committees.
- Waiver for 24-hour internal response.
- Ensure that employees are familiar with proper waste Handling and Emergency Procedures. UAC R315-262-16(9)(iii)
- Emergency Coordinator on-site or on-call.

SQG Preparedness and Prevention UAC R315-262-16(b)(9)(ii)

The small quantity generator shall post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

- The name and emergency telephone number of the emergency coordinator;
- Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- The telephone number of the fire department, unless the facility has a direct alarm.



Emergency Contact(s) Telephone Posting

This information is to be posted next to telephones or in areas of a small quantity generator of hazardous waste (SQG) directly involved in the generation and accumulation of hazardous waste. [R315-262-16(b)(9)(ii)]

Emergency Coordinator(s):

Emergency Coordinator Name	Emergency Telephone Number

Emergency Contacts:

Emergency Contact	Phone Number
Fire Department *(unless direct alarm)*	
The following emergency contact information is not required but is recommended.	
Police Department	
Hospital	
State Emergency/Spill Notification or Reporting	801-536-0200/801-536-4123
Local/Regional Notification or Reporting *(e.g., LEPC)*	
National Response Center *(24-Hour)*	1.800.424.8802

Location of Emergency Response Equipment:

Fire extinguishers	
Spill control material	
Fire alarm *(if present)*	

SQG Preparedness and Prevention
UAC R315-262-16(b)(9)(iii)

The small quantity generator shall ensure that all employees are thoroughly familiar with ***proper waste handling and emergency procedures****, relevant to their responsibilities during normal facility operations and emergencies.*

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

LQGs (Large Quantity Generators)

LQG Requirements R315-262-17

- LQGs must obtain an EPA Identification Number using Site ID Form (EPA Form 8700-12)
- All LQGs must re-notify the Division by March 1 of each even-numbered year with a Biennial Report
- Accumulate hazardous waste onsite for no more than 90 Days

UTAH DEPARTMENT of ENVIRONMENTAL QUALITY
WASTE MANAGEMENT & RADIATION CONTROL

LQG Container Requirements R315-262-17

Containers

- Compatible with the waste and in good condition
- Keep containers closed
- Label containers with the words “Hazardous Waste”, an indication of the hazards of the contents, and start date of when the waste began accumulating
- Not handle or store containers so that they might rupture, leak or be damaged
- Inspect Central Accumulation Areas (CAA) weekly

Labeling Requirements at the Point of Generation

IGNITABLE

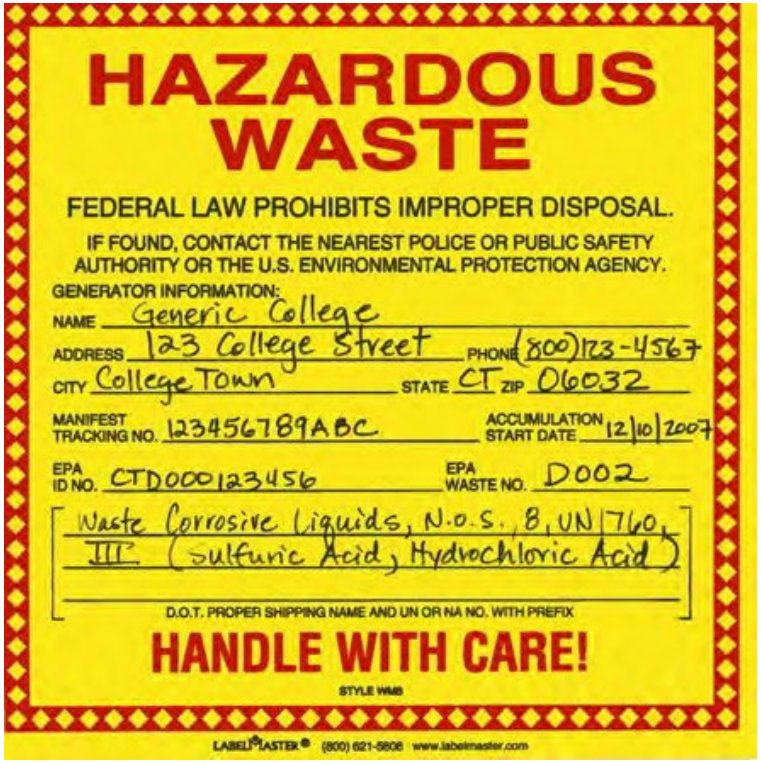
CORROSIVE

REACTIVE

TOXIC

EPA Characteristics | **DOT Shipping Labels** | **OSHA GHS Pictograms** | **NFPA 704 Labels**

UTAH DEPARTMENT of ENVIRONMENTAL QUALITY
WASTE MANAGEMENT & RADIATION CONTROL



Labeling Requirements for Shipment

LQG Container Storage R315-262-17(a)(1)(vi)

Special conditions for accumulation of ignitable and reactive wastes.

- Containers holding ignitable or reactive waste shall be located at least 50 feet from the facility's property line unless a written approval is obtained from the authority having jurisdiction over the local fire code allowing hazardous waste accumulation to occur within this restricted area. A record of the written approval shall be maintained as long as ignitable or reactive hazardous waste is accumulated in this area.

LQG Central Accumulation Areas
UAC R315-262-17

Hazardous Waste

Central Accumulation Area

Containers - keep closed, in good condition, compatible with contents
Labels – Hazardous Waste label with Accumulation Start Date
Access – Maintain aisle space and ensure labels face outward

Fire – Police - Medical
9-1-1

Emergency Coordinator
Joe Smith - (303) XXX-XXXX

Fire Extinguisher, First Aid Kit, Eyewash and Spill Kit are located ….

LQG Central Accumulation Area UAC R315-262-17(a)

- 90-Day Areas
- Containers
  - Labeling – accumulation start date
  - Special requirements
  - Inspect Weekly
  - Preparedness & Prevention
  - Emergency Procedures
  - Training

LQG Preparedness & Prevention UAC R315-262-250 through 265

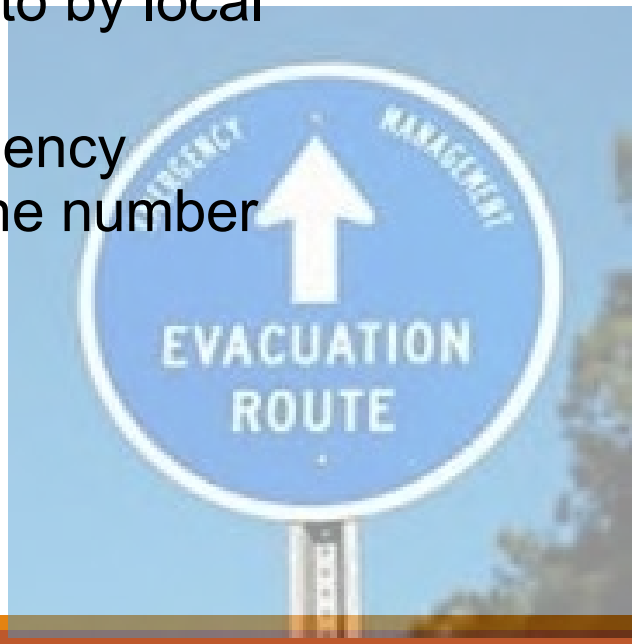
- Must be Equipped with:
  - Internal Communication or Alarm System
  - Device Capable of Summoning Emergency Assistance
  - Portable Fire Extinguishers/Fire Control Equipment
  - Spill Control and Decontamination Materials
  - Water at Adequate Volume and Pressure
- Must Test and Maintain All Equipment
- Must Have Sufficient Aisle Space

LQG Preparedness & Prevention R315-262-250 through 265

- Attempt to make arrangements with local Fire, Police, Emergency Response Teams and Hospitals or LEPCs
  - Determine potential need
  - Familiarize with facility layout
  - Document attempts and arrangements
- Emergency Coordinator onsite or on-call

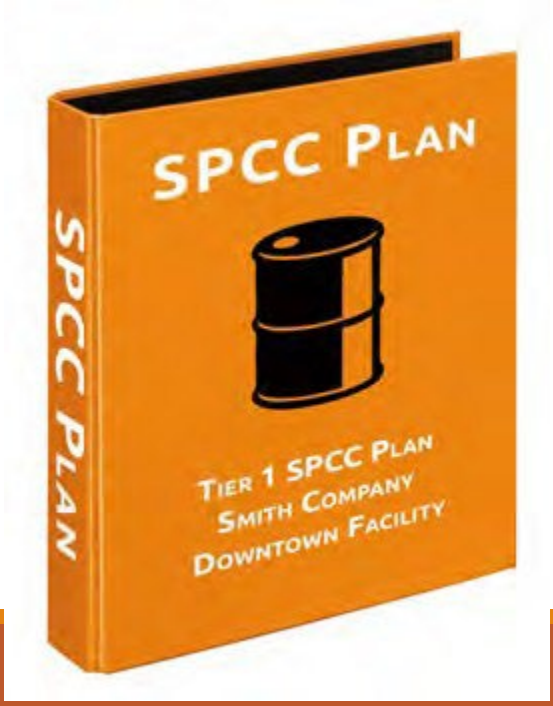
LQG HW Contingency Plan R315-262-250 through 265

- Written Hazardous Waste Contingency Plan must include:
  - Description of actions to be taken
  - Descriptions of arrangements agreed to by local
    - Emergency Responders or LEPCs
  - Names and phone numbers of Emergency Coordinators or position title and phone number
  - List of emergency equipment
  - Evacuation Plan



LQG Hazardous Waste Contingency Plan R315-262-250 through 265

- Spill Prevention, Control and Countermeasures Plan (SPCC) or “One Plan”
- Copies of the Contingency Plan
- Amendment of the Plan



LQG HW Contingency Plan R315-262-250 through 265

- Quick Reference Guide
  - Types/Names of Hazardous Waste and Hazards
  - Estimated Maximum Amounts of Waste
  - Wastes Where Exposure Would Require Unique/Special
    - Medical Treatment
  - Maps of Waste Locations and Routes of Access and Evacuation
  - Location of Water Supply
  - Identification of On-Site Notification Systems
  - Names and Phone Numbers of Emergency Coordinators

EXAMPLE QUICK REFERENCE GUIDE

This example was created by EPA Region 7 to be used as a guide to assist the regulated community with compliance. It does not substitute for or replace any regulatory requirements.

Contingency plan quick reference guide

ABC FACILITY
1000 SW Main Street
Anytown, Iowa 50000

Facility Contacts:

Primary Emergency Coordinator:	George Washington	Mobile Number (24/7): 515-555-0000
Secondary Emergency Coordinator:	Abraham Lincoln	Mobile Number (24/7): 515-555-0001
Tertiary Emergency Coordinator:	Martha Washington	Mobile Number (24/7): 515-555-0002

Note: ABC Facility operates 3 shift, 24/7, but the order of contact during an emergency is listed above.

Hazardous Waste Information:

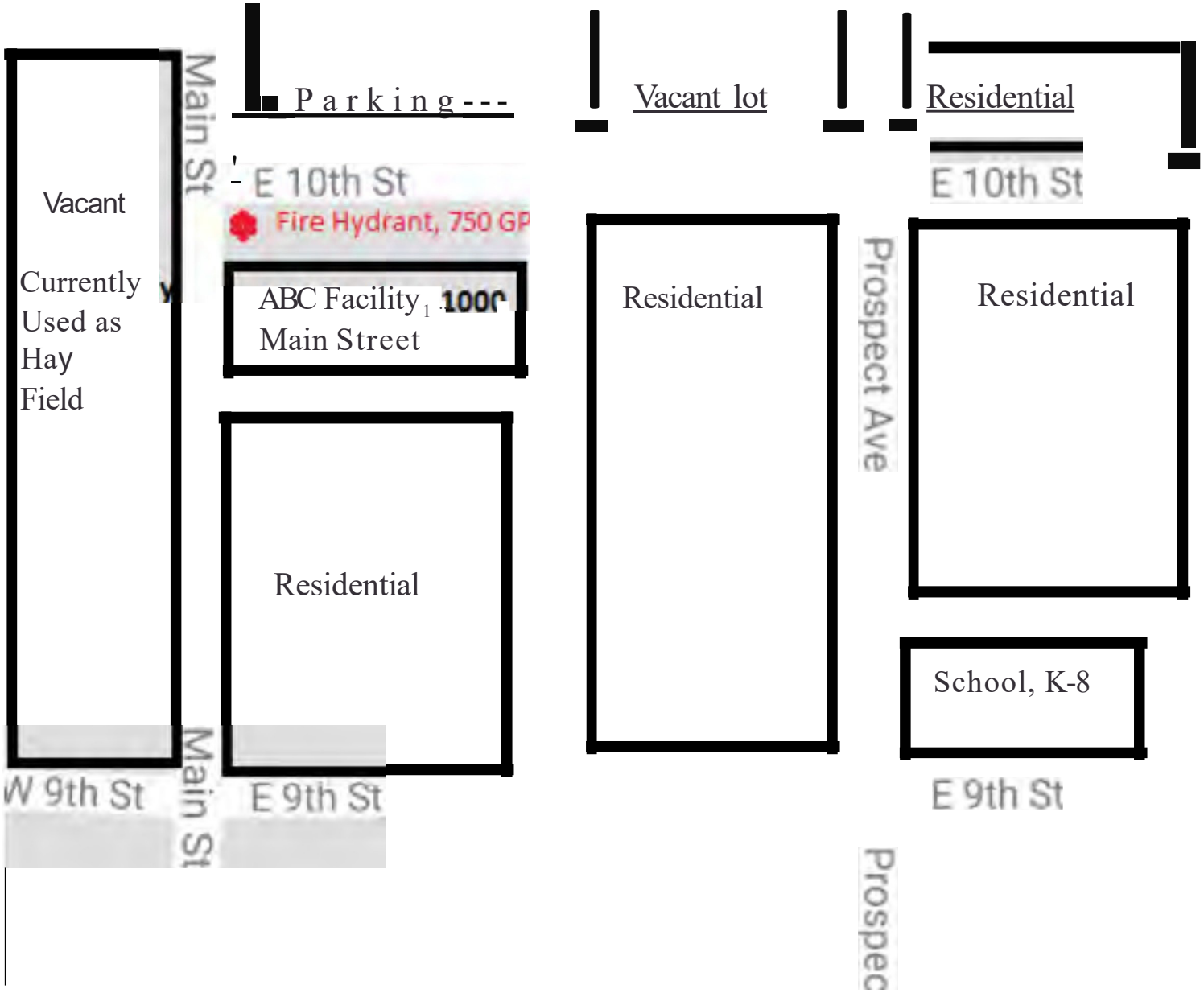
Name of Waste	Waste Codes/Hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hopsital/Treatment personnel
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	NW corner of Warehouse, hazardous waste storage area	Five, 55-gallon drums (2,065 pounds)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	Two Satellite Accumulation Areas as noted with blue asterisks on the attached map.	One, 55-gallon drum (440 pounds)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Off-specification 2, 4-D , a herbicide, (brand name is Amine 4) (liquid)	D016 (toxicity); Flashpoint 190 °F.	SW corner of warehouse near new product storage of Amine 4.	Off-Spec – 1 tank, 1,000 gallons New product – 1 tank (same tank as off-spec), 1,000 gallons	Use PPE to prevent contact with skin and eyes. Immediately prevent spills from entering drains and waterways. Prevent sources of ignition and open flames.	Contact Chemtrac for emergency medical treatment information at 1-800-424-9300. If in eyes, wash eyes for several minutes.

* Satellite Accumulation Area for Paint Related Waste Material (D001, F003, F005)
* Fire Alarms (ring on-site only, there are no fire alarms that notify off-site personnel)
* Telephone for off-site notification of emergency

→ Indicates evacuation route out of the building.

Note 1: Hazardous waste (paint related waste) is generated and accumulated inside each of the two paint booths, and is accumulated in the hazardous waste storage area. Amine 4 can be a hazardous waste if it is off-specification and it is generated and accumulated in the SW corner at the Amine 4 tank.

Note 2: Smoke detectors are located throughout the office and main warehouse on the ceiling, in a grid about every 25 feet. Smoke detectors are connected to an automatice sprinkler system.


Parking---
Vacant lot
Residential
E 10th St
Vacant
Currently Used as Hay Field
Main St
E 10th St
Fire Hydrant, 750 GP
ABC Facility
Main Street
Residential
Residential
Prospect Ave
Residential
School, K-8
W 9th St
Main St
E 9th St
E 9th St
Prospec

LQG Emergency Procedures R315-262-250 through 265

- Emergency Procedures Performed by Emergency Coordinator
  - Imminent or Actual Emergency Situation;
    - Activate Alarms, Notify Agencies
    - Identify Character, Source, Amount and Extent of Release
  - Assess Hazards to Human Health and Environment
  - Report and Notify;
    - Division of Waste Management and Radiation Control at 801-536-0200; after hours 801-536-4123 and National Response Center 800-424-8802.
  - Take Reasonable Measures to Prevent Spread.
  - Document in Operating Record and Submit Final Report to the Division within 15 days.

LQG Training
R315-262-17

- Facility Personnel Must Successfully Complete
  - Training
  - Relevant Hazardous Waste Management Procedures
  - Response to Emergencies
  - HAZWOPER Can be Used
  - Complete Within Six Months and Annually
  - Rules Explicitly Allow Computer-Based Training

Job Title / Environmental Responsibilities	General Awareness	Job Specific RCRA	Job Specific Other"	Emergency Response	Employee
ENVIRONMENTAL MANAGER Primary HW emergency coordinator; sampling and characterizing wastes; hazardous waste handling and cleanup; prepare drums and shipping papers and manifests for shipment; recordkeeping; training.	New Hire RCRA; Annual Onsite RCRA	Initial 40 hr RCRA		Annual Emergency Contingency Plan (ECP) Training	
ENVIRONMENTAL ENGINEER Alternate HW emergency coordinator; sampling and characterizing wastes; hazardous waste handling and cleanup; prepare drums and shipping papers and manifests for shipment; recordkeeping; training.	New Hire RCRA; Annual Onsite RCRA	Initial 40 hr RCRA	Full DOT HAZMAT-every 3 years	Annual ECP Training; HAZWOPER w/Annual refresher	
OPERATORS Hazardous waste handling and cleanup; prepare hazardous waste for shipment; prepare shipping papers and manifests for shipment; recordkeeping.	New Hire RCRA; Annual Onsite RCRA	Annual (job-specific) training	Full DOT HAZMAT-every 3 years	Annual ECP Training; HAZWOPER or RCRA training w/Annual refresher	
WATER TREATMENT OPERATORS Emergency Response	New Hire RCRA; Annual Onsite RCRA		DOT-Warehouse-every 3 years	Annual ECP Training; HAZWOPER w/Annual refresher	
ENVIRONMENTAL SPECIALIST Sampling and characterizing wastes; hazardous waste handling and cleanup; prepare drums and shipping papers and manifests for shipment; recordkeeping; training.	New Hire RCRA; Annual Onsite RCRA	Initial 40 hr RCRA Annual RCRA Refresher	Full DOT HAZMAT-every 3 years	Annual ECP Training; HAZWOPER w/Annual refresher	
ENVIRONMENTAL Technician Prepare shipping papers and manifests for shipment; recordkeeping; training.	New Hire RCRA; Annual Onsite RCRA		Full DOT HAZMAT-every 3 years	Annual ECP Training; HAZWOPER w/Annual refresher	

Satellite Accumulation R315-262-15

- At or Near the Point of Generation.
- Under the Control of the Operator.
- 55-Gallons of HW or Either 1 Quart or 2.2 Pounds of acute HW.
- Container Must be Dated and Moved to a Central Accumulation Area or Offsite Within 3 Consecutive Calendar Days once full.
- “Hazardous Waste” and Indication of Hazards.
- Containers Kept Closed Except Under Limited Circumstances.

LQG Central Accumulation Area Closure

- Closure Notification Standards for Units (R315-262-17(a)(8))
  - Notice in Facility Operating Record or
  - Meet Closure Performance Standards and Notify
    - Minimize or Eliminate Post-Closure Escape of Waste
    - Remove or Decon Equipment, Structures, Soil and Residue
    - Close as a Landfill

Link to the form 8700-12
https://rcrapublic.epa.gov/rcrainfoweb/documents/notification.pdf

LQG Unit Closure
UAC R315-262-17(a)(8)(ii)

(A) Notify the Director using EPA form 8700-12 *no later than 30 days* prior to closing the facility.

(B) Notify the Director using EPA form 8700-12 within 90 days after closing the facility that it has complied with the closure performance standards of R315-262-17(a)(8)(iii) or (iv).

VSQG Consolidation R315-262-14 and 17(f)

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- **Applies only to a VSQG and a LQG under the control of the same person/company.**
- **Notify the Director using EPA Form 8700-12 and identify which VSQGs are participating**
- **SQGs Cannot Consolidate Waste to an LQG**

New VSQG Consolidation R315-262-17(f)

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- **Recordkeeping for each shipment – normal business records.**
- **Manage consolidated waste as LQG hazardous waste.**
- **Add accumulation start date to container labels.**
- **Biennial Reporting will use a different source code for the VSQG consolidated waste to distinguish from the LQG's own generated waste**

Questions?

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