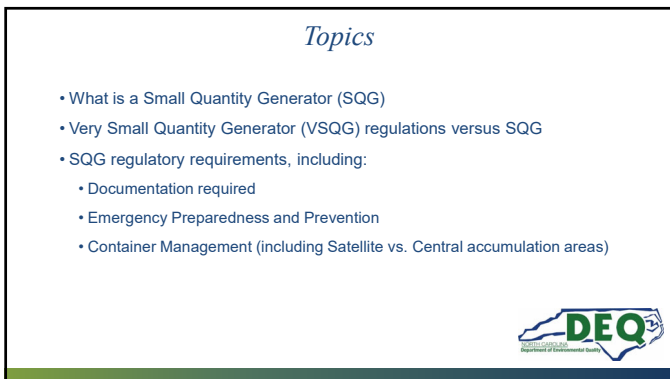


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3

Not Included in the Presentation

- Does not include every SQG requirement (but most covered)!
- Does not include regulations pertaining to tanks, drip pads, or containment buildings
- Does not have the adopted references for Florida
- Does not have the episodic generation requirements (40 CFR 262.16(f))



4

What is a Small Quantity Generator?
40 CFR 260.10

A facility can be a SQG if they:

- Generate more than 220 pounds but less than 2,200 pounds of non-acute hazardous waste in a calendar month*
- Less than or equal to 2.2 pounds of acute hazardous waste
- A VSQGs accumulated more than 2,200 pounds of hazardous waste at any time (now an SQG)
- Less than or equal to 220 pounds of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste listed in §261.31 or §261.33(e)

*Note: This can also happen if a facility does a chemical cleanout and exceeds the amount that is allowed in a calendar month unless approved for episodic event.



5

VSQG vs. SQG


Requirement	Very Small Quantity Generator (VSQG)	Small Quantity Generator (SQG)
Notify of HW activity and obtain EPA ID number	Not required	Required (40 CFR 262.18(a) and (b))
Re-notification of HW activity	Not required	Every 4 years starting in 2021 (40 CFR 262.18(d)(1))
Maximum accumulation time limits	No time limit	180 days in CAA (270 days if waste is shipped 200 miles or more) (40 CFR 262.16(b) through (d))
Maximum on-site waste accumulation	2,200 pounds non-acute at any time	13,200 pounds at any time (40 CFR 262.16(b)(1))
Hazardous waste determination	Required (40 CFR 262.11(a) through (d))	Required (40 CFR 262.11)
Marking/labeling containers/tanks	Not required (recommended to identify content)	Required on each container and tank (40 CFR 262.15)
Accumulation start date marking/labeling	Not required	Date must be visible for inspection on each CAA container or log for tanks (40 CFR 16(b))



6

✓ VSQG vs. ✓ SQG


Requirement	Very Small Quantity Generator (VSQG)	Small Quantity Generator (SQG)
Use of manifest to ship waste off-site	Not required (but documentation of proper disposal required by F.A.C. in Florida)	Required (40 CFR 262.20-262.23)
Use transporters with EPA ID numbers	Not required	Required (40 CFR 262.18(c))
Prepare LDR notification/certifications	Not required	Required (40 CFR 262.16(b)(7) ref. 40 CFR 268)
Exception reports	Not required	Required (40 CFR 262.42(b))
Waste minimization	Not required	Good faith effort required (40 CFR 262.27(b))
Personnel training	Not required	Basic training required (40 CFR 262.16(b)(9)(iii))
Emergency Preparedness and Prevention including emergency arrangements	Not required	Required (40 CFR 262.16(b)(8) and (9)) and 62-730.160(4), F.A.C (Florida))



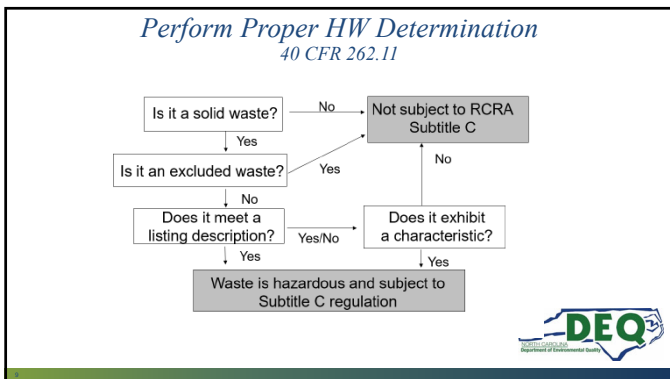
7

✓ VSQG vs. ✓ SQG

Requirement	Very Small Quantity Generator (VSQG)	Small Quantity Generator (SQG)
Contingency plan and emergency procedures	Not required	Basic planning required (40 CFR 262.16(b)(9))
Weekly inspections	Not required	Required for CAAs (40 CFR 262.16(b)(2)(iv); 62-730.160(3) F.A.C.
Maintain records, prepare/file records	Disposal records required in Florida (62-730.030(2)), FAC (Not required by federal regulations)	Required (40 CFR 262.11(f), 262.40(a, c, d), 262.42(b), 262.43, 262.44)
Allowable classes of facilities to receive off-site shipment	<ul style="list-style-type: none"> Permitted or interim status HW facilities HW recycling facilities State-permitted, licensed, or registered municipal or industrial waste facilities 40 CFR 262.14(a)(5) ALQG under the control of the same person as VSQG must meet conditions in 40 CFR 262.14(a)(5)(viii) HIW with VSQG authorization 	<ul style="list-style-type: none"> Permitted or interim status HW facilities HW recycling facilities 40 CFR 260.10 "Designated Facility"



8



9

Hazardous Waste Determination
40 CFR 262.11(f)

The records must include (but are not limited to):

- The results of any tests, sampling, waste analyses
- Records documenting the tests, sampling and analytical methods used to demonstrate the validity/relevance of such tests;
- Records consulted in order to determine the process by which the waste was generated, the composition of the waste and the properties of the waste; and
- Records which explain the knowledge basis for the generator's determination as described in paragraph (d)(1) of 40 CFR 262.11.



10

EPA Identification Numbers
40 CFR 262.18(a-b)

A generator must not treat, store, dispose of, transport, or offer for transportation, hazardous waste without having received an EPA identification number from the administrator.

The EPA ID number will remain with the property.



11

Re-notification Requirements
40 CFR 262.18

Requires re-notification for SQGs:

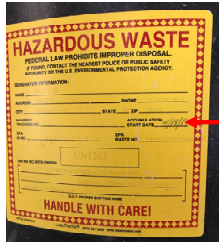
- SQGs every four years starting in 2021
 - Must be submitted to FDEP by September 1 of each year the re-notification is required
- Florida Guidance Document:
 - https://floridadep.gov/sites/default/files/SQG_Re-Notification_Fact_Sheet_25Jan21_0.pdf
- EPA Guidance Document:
 - <https://www.epa.gov/hwgenerators/re-notification-requirements-small-quantity-generators>



12

Maximum Accumulation Time Limits
40 CFR 262.16(b) through (d)

180 days (270 days if waste is shipped 200 miles or more to a TSD) [RO 13000]



13

Maximum Onsite Waste Accumulation
40 CFR 262.16(b)(1)

No more than 13,200 pounds of waste at any time



14

Pre-Transport Requirements
40 CFR 262.30 through 262.33

- 262.30 Packaging
- 262.31 Labeling
- 262.32 Marking
- 262.33 Placarding



Before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must comply with the applicable Department of Transportation regulations on packaging, labeling, marking, and placarding as defined in 49 CFR.



15

Approved TSDFs & Transporters
40 CFR 262.18(c)

SQGs must use Treatment, Storage, and Disposal facilities and Transporters with valid EPA ID numbers.




16

Hazardous Waste Manifest
40 CFR 262.20 through 262.23

The HW manifest may be the single most important document for a generator!

- "Cradle-to-Grave" mandated by Congress
- Manifests document the cradle to grave
- The manifest clearly documents who, what, where, when, and how much has been sent
- Facilities (TSDs) mishandle, go bankrupt, etc. and the waste and/or contamination will have to be dealt with

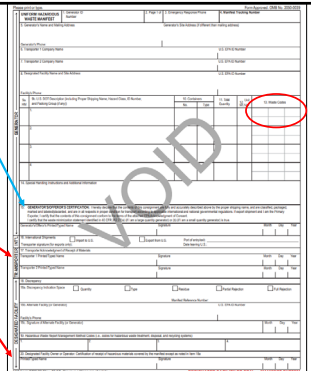


17

Box 15 - Generator's Certification:
Generator must read, sign, and date the waste minimization certification statement (40 CFR 262.27)

Ensure the facility is keeping the signed completed copies with signatures from the generator, transporter and final designated facility.

***SIGNATURE INDICATES AGREEMENT**



18

Exception Reporting 40 CFR 262.42(b)

A SQG who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility **within 60 days** of the date the waste was accepted by the initial transporter must file an exception report to FDEP:

- A legible copy of the manifest, and,
- With some indication that the generator has not received confirmation of delivery.

19

LDR Notification/Certification 40 CFR 268

- Generator must issue a one-time notification to the Treatment Facility
- Generator certifies whether the waste meets the treatment standards; or that the TSD will make the determination
- Generator must sign the certification
- LDR documents must remain on file for three years



20

Waste Minimization 40 CFR 262.27(b)



A small quantity generator must certify that it has:

- 1) Made a good-faith effort to minimize their waste generation, and
- 2) Selected the best available and affordable waste management method.

Block 15 of manifest has a statement that the person signing is certifying waste minimization practices.



21

Personnel Training
40 CFR 262.16(b)(9)(iii)

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



22

Emergency Procedures – Emergency Coordinator
40 CFR 262.16(b)(9)(i)

The Emergency Coordinator(s):

- At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time)
- They are responsible for coordinating all emergency response measures



23

Required Emergency Information
40 CFR 262.16(b)(9)(ii)

The SQG must post the following information **next to telephones or in areas directly involved in the generation and accumulation of HW:**

- The name and 24-hour 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).



24

Emergency Arrangements, continued

- A generator shall maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency.
- The documentation must include documentation *in the operating record* that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.
 - Send certified mail return receipt, email confirmations, etc.



28

Container Management for Small Quantity Generators



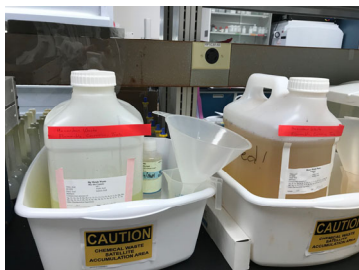
29

What is a Satellite Accumulation Area??

(40 CFR 262.15)

- Is an "area" with a container(s) of hazardous waste that:
 - Are where waste initially accumulate prior to removal to a central area ("at or near the point of generation"); and is,
 - "under control of the operator" of the process that generated the waste

SAA's do not have to be designated in any particular manner; however, it is good practice (signage, lines on the floor etc.) But the facility should know where/what they are!




30

Satellite Accumulation Areas

(40 CFR 262.15)

FAQs about SAAs:

- A SAA can have multiple containers (up to 55 gallons of total waste)
- The same SAA can have multiple waste types, but cannot exceed 55 gallons of waste
 - Comply with 262.15(a)(6) once 55 gallons of waste exceeded
- A facility is not limited to how many SAA they can have
- SAA waste can only be consolidated in containers within the same SAA or go to a CAA




31

Central Accumulation Areas

(40 CFR 262.16)

Any on-site hazardous waste accumulation area with units [containers] subject to 262.16

- A generator can have more than one CAA.
- “Central” does not denote a physical location, nor does it have to be “centrally” located.
- CAA(s) can be in any location of the facility.
- CAA containers can be moved from one CAA to another CAA (but cannot redate)




32

Container Management

Satellite Accumulation Area vs. Central Accumulation Areas
40 CFR 262.15 (SAA)/40 CFR 262.16 (CAA)


Requirement	Satellite Accumulation Units	180/270-day containers (CAA)
Must be in good condition	Yes	Yes
Must be compatible with HW in container	Yes	Yes
Must be closed at all times except when adding/removing waste	Yes (can also open to consolidate waste or venting)	Yes
Weekly Inspections	None	Weekly
Hazard marking	"Hazardous Waste" and indication of hazards	"Hazardous Waste" and indication of hazards
Date marking	On the date 55 gallons of non-acute HW is exceeded	On the date waste first goes in the container



33


Container Management, continued
Satellite Accumulation Area vs. Central Accumulation

Requirement	Satellite Accumulation Units	180-day containers (CAA)
Maximum length of accumulation	Unlimited	180/270 days
Maximum waste volume in storage	55 gallons (or 1 quart of acute wastes)	13,200 pounds
Personnel training required	No (but maybe yes)	Yes
Can treat hazardous waste in unit	No	Yes
Must comply with Subpart CC air emission standards	No	Yes
Comply with preparedness, prevention, and emergency procedures	Yes	Yes





34

Container Management
40 CFR 262.15 (SAA) and 262.16(b)(2) and (6) (CAA)




- Must be clearly marked "Hazardous Waste" (SAA/CAA);
- with an indication of the hazards of the contents (SAA/CAA); and
- the date upon which each 180-day/270-day accumulation period begins (CAA) "accumulation start date"

35


Container Management
40 CFR 262.15 (SAA) and 262.16(b)(2) and (6) (CAA)



Both SAA and CAA containers:

A Note About Palletized Waste

- Each container must be clearly marked (can't have one label on a shrink-wrapped pallet of HW)
- Would also have an issue with aisle space on inner containers



36

Container Management

40 CFR 262.15 (SAA) and 262.16(b)(2) and (6) (CAA)



Both SAA and CAA containers:



- Must be in good condition
- Must be compatible with contents
- Must be closed (unless actively adding or removing waste)
 - *to minimize emissions of volatile wastes, to help protect ignitable or reactive wastes from sources of ignition or reaction, to help
- RCRA Online document RO 14826 has excellent guidance from EPA on closed containers for SAA, CAA, liquid, solid waste, etc.: <https://rcrapublic.epa.gov/files/14826.pdf>



37

Container Management

40 CFR 262.15 (SAA) and 262.16(b)(2) and (6) (CAA)

Both SAA and CAA containers:

- Waste must be kept inside the container
- Clean up spills immediately


38

Hazard Indication Guide for Marking HW Containers


Methods to indicate the hazards of the contents of a container include, but are not limited to the following

The applicable hazardous waste characteristic(s) marked on the container or on a label on the container: **Ignitable, Corrosive, Reactive, Toxic**


Department of Transportation labels or placards at 49 CFR part 172 subpart E



Hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1201.1209




Chemical hazard label consistent with the National Fire Protection Association code 704



• "Newer" requirement from the Hazardous Waste Generator Improvements Rule

• All HW containers (SAA and CAA) must be marked with an indication of the hazards of the contents of the container.



39



40

CAA Inspection Records – Containers

40 CFR 262.16(b)(2)(iv)

At least weekly, the generator must inspect Central Accumulation Areas (CAAs) looking for leaking containers and deterioration of containers caused by corrosion.

Documentation of weekly inspections in Florida must include:

- Include the date and time of the inspection,
- the legibly printed name of the inspector,
- the number of containers,
- the condition of the containers,
- a notation of the observations made, and
- the date and nature of any repairs or other remedial actions

**HAZARDOUS
WASTE
DRUM
STORAGE**

41

Weekly Inspection Form Example

Meets Florida Requirements

WEEKLY INSPECTION LOG

Inspector: _____ Date: _____ Time: _____
Clearly Print Name

Accumulation Area Inspected: _____ Number of Containers: _____

Are all containers in good condition?	Yes ___ No ___
Is there any evidence of leaks or spills?	Yes ___ No ___
Are all containers labeled "Hazardous Waste"?	Yes ___ No ___
Are all containers marked with an accumulation start date?	Yes ___ No ___
Are all containers closed?	Yes ___ No ___
Is there adequate aisle space between rows of drums?	Yes ___ No ___
Is spill control equipment available?	Yes ___ No ___

Observations: _____

(If containers are in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action _____ Date _____

- Weekly inspections conducted and documented (in Central Accumulation Areas)
- <https://floridadep.gov/waste/permitting-compliance-assistance/content/hazardous-waste-publications>

42

Good aisle space!



Aisle Space

40 CFR 262.16(b)(8)(v)

- Must be maintained to allow unobstructed movement of personnel, fire protection equipment, spill equipment, etc.
- Also required in SAAs



43

Improper Aisle Space



If this was HW, bad aisle space!

44

Questions?



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45
