

5.3 Determining Your Generator Status

Hazardous waste is a by-product of many large and small businesses. From a public perspective, it is most often associated with medium- to large-size manufacturers, but in reality many small, non-manufacturing businesses produce some hazardous waste. At the larger end of the spectrum, a metal fabrication plant may have hazardous waste associated with cleaning and painting its products, or a large printer may have ink wastes classified as hazardous. On the other hand, a small auto service shop, a hardware store, a small copy shop, or even a general merchandise store may generate small quantities of hazardous waste.

From a regulatory view, the business is responsible for determining if it is generating any hazardous waste. Generators fall into one of three categories (i.e. very small quantity generator, small quantity generator, and large quantity generator or VSQG, SQG, and LQG, respectively). The generator status is determined by three factors:

- 1. amount of hazardous waste generated per calendar month**
- 2. amount of hazardous waste accumulated on site at any one time**
- 3. whether the waste is hazardous or acute hazardous**

Very Small Quantity Generator

A VSQG has a monthly generation limit of 100 kg (220 pounds) or less of hazardous waste, and 1 kg (2.2 pounds) or less of acute hazardous waste (consisting of EPA listed pesticides). A VSQG cannot accumulate more than 1,000 kg (2,205 pounds) of hazardous waste, or 1 kg (2.2 pounds) of acute hazardous waste.

A VSQG must determine if its waste is hazardous and comply with generation and storage limits. It must properly manage or dispose of hazardous waste at an approved hazardous waste facility. In Wisconsin it is legal to send hazardous waste to approved solid waste landfills, but no landfills currently have such authorization. When the wastes are transported, they must be properly marked and labeled according to U.S. Department of Transportation rules, and a licensed transporter is to be used. VSQGs are allowed to self transport only to a local household hazardous waste and VSQG collection facility. If the transporter requires a manifest, then the VSQG must get an EPA identification number.

Small Quantity Generator

A SQG has monthly generation limits of less than a 1,000 kg (2,205 pounds), and an accumulation limit of 6,000 kg, or 13,230 pounds. The maximum accumulation cannot be stored more than 180 days (270 days if the hazardous waste facility is over 200 miles away).

The regulatory burden is greater for a SQG. In this case an EPA identification number is required, proper storage regulations apply, recordkeeping and reporting requirements apply, an annual report must be given to the Wisconsin DNR, and emergency procedures must be established for leaks, spills, or fires involving hazardous waste.

Large Quantity Generator

A LQG generates over 1,000 kg (2,205 pounds) per month and may not store hazardous waste more than 90 days. With acute hazardous waste, any generator exceeding the VSQG limit of 1 kg (or 100 kg spill) becomes a LQG. Any business falling in this category should contact the Department of Natural Resources for information on additional requirements.

Source:

Managing Your Hazardous Wastes: A Guide for Wisconsin Small Quantity Generators, 3rd edition, Wisconsin Department of Natural Resources, 1993.