

HAZARDOUS WASTE GENERATOR REQUIREMENTS GUIDE

Requirements	Very Small Quantity Generator	Small Quantity Generators	Large Quantity Generators
Quantity Limits			
The amount of hazardous waste generated per month determines how a generator is categorized and what regulations must be complied with.	≤100 kg/month, and ≤1 kg/month of acute hazardous waste, and ≤100 kg/month of acute spill residue or soil §260.10	>100 and <1,000 kg/month §260.10	≥1,000 kg/month, or >1 kg/month of acute hazardous waste, or >100 kg/month of acute spill residue or soil §260.10
EPA ID Number			
Acquire a unique EPA identification number that identifies generators by site.	Not required	Required §262.18	Required §262.18
On-Site Accumulation Quantity			
Determine amount of hazardous waste generators are allowed to “accumulate” on site without a permit.	≤1,000 kg or ≤1 kg acute hazardous waste or ≤100 kg of acute spill residue or soil §§262.14(a)(3) and (4)	≤6,000 kg §262.16(b)(1)	No Limit
Accumulation Time Limits			
Determine amount of time hazardous waste is allowed to accumulate on site.	None	≤180 days or ≤270 days (if transporting greater than 200 miles) §262.16(b)-(d)	≤90 days §262.17(a)
Accumulation Requirements			
Manage hazardous waste in compliance with certain technical standards.	None	Basic requirements with technical standards for containers, tanks, drip pads or containment buildings §§262.16(b)(2)-(5)	Full compliance for management of containers, tanks, drip pads or containment buildings §§262.17(a)(1)-(4)
Personnel Training			
Ensure appropriate personnel complete classroom or on-the-job training to become familiar with proper hazardous waste management and emergency procedures for the wastes handled at the facility.	Not Required	Basic training required §262.16(b)(9)(iii)	Required §262.17(a)(7)
Contingency Plan & Emergency Procedures			
Develop procedures to follow during an unplanned major event.	Not Required	Basic planning required §§262.16(b)(9)	Full plan required Part 262 subpart M (from §262.17(a)(6))

The table below provides a summary of requirements for each class of hazardous waste generator. This is not an exhaustive list of all of the requirements for generators and should be used as just a guide. Generators are responsible for all applicable requirements in 40 CFR part 262. Additionally, hazardous waste generators should check with their state regulatory agency because certain states have additional or more stringent requirements than the federal government.

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Preparedness & Prevention			
Develop procedures to follow in the event of an emergency.	Not Required	Required §262.16(b)(8)-(9)	Required Part 262 subpart M (from §262.17(a)(6))
Air Emissions			
Control hazardous air emissions from tanks and containers	Not required	Not Required	Required Part 265 subparts AA, BB and CC from §262.17(a)(1) and (2)
Land Disposal Restrictions			
Meet standards for placing on the land and associated requirements for certifications, notifications, and waste analysis plans	Not Required	Required Part 268 from §262.16(b)(7)	Required Part 268 from §262.17(a)(9)
Manifest			
Tracking hazardous waste shipments using the multiple-copy manifest - required by the Department of Transportation (DOT) and EPA	Not Required	Required Part 262 subpart B	Required Part 262 subpart B
Waste Minimization			
Certify steps taken to reduce or eliminate the generation of hazardous waste	None	Good faith effort required §262.27	Program in place required §262.27
Pre-Transport Requirements			
Package and label hazardous waste for shipment off site to a RCRA facility for treatment, storage, or disposal	Only if required by the DOT or the state	Required §§262.30-262.33	Required §§262.30-262.33
Biennial Report			
Report data from off-site shipments of waste during the previous calendar year	Not Required	Not Required	Required §262.41
Exception & Additional Reporting			
Report if any required copies of signed manifests are not received back. Provide information on quantities and disposi-	Not Required	Required §§262.42(b) and 262.43	Required §§262.42 and 262.43

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Record Keeping			
Maintain records of waste testing, manifests, biennial reports and exception reports	Not Required	Required (except biennial reports) §262.11(f) and §262.40(a) and (d)	Required §§262.42 and 262.43
Facility Type			
Send off-site shipments to appropriate facilities for management	Facilities noted in §§262.14(a)(5)	RCRA permitted/interim status facility Parts 264/265, 266/267 and 270	RCRA permitted/interim status facility Parts 264/265, 266/267 and 270
Closure			
Close equipment, structures, soils and units by meeting specified performance standards and disposal and decontamination requirements	Not Required	Required for tanks, drip pads and containment buildings - Tanks only §262.16(b)(3)(vi) Unit specific Part 265, subpart W and DD for drip pads and containment buildings	Required - General §262.17(a)(8) - Unit specific Part 265, subpart W for drip pads

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If you feel any of your hazardous waste streams are misclassified, contact IDR immediately.

Our trained experts can determine if you may be misclassified.

This could result in a **LOWER GENERATOR STATUS BEING ASSIGNED** and a **SUBSTANTIAL REDUCTION** in waste fees.

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