

# **VSQG Consolidation of Hazardous Waste at a LQG**

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# VSQG/LQG Waste Consolidation

- The Hazardous Waste Generator Improvements Rule allows a very small quantity generator (VSQG) to consolidate their hazardous waste at a large quantity generator (LQG) site providing the two sites are under the control of the same person.

# VSQG/LQG Waste Consolidation

- **Control** - the power to direct policies at the generator sites
- **Same person** -
  - individual
  - trust
  - firm
  - joint stock company
  - Federal Agency
  - commission
  - any interstate body
  - corporation(including a government corp.)
  - partnership
  - association
  - State
  - municipality
  - political subdivision of a State

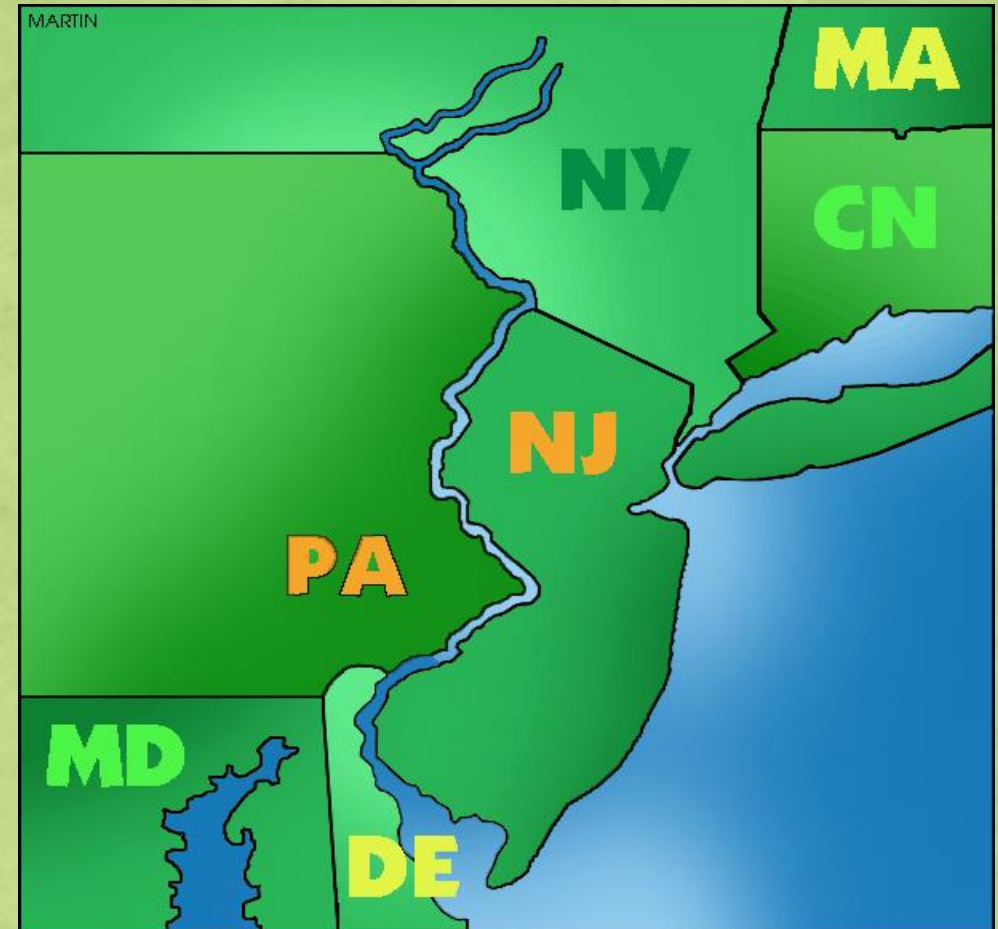
*\*contractors are not included\**

(as defined under 40 CFR 260.10)

# **VSQG/LQG Waste Consolidation**

- **This new provision allows a company with various locations to consolidate the hazardous waste generated at their VSQG site with the hazardous waste stored at their LQG site.**

Generator sites can be down the street or across state lines as long as both states have adopted the consolidation provision.



# **VSQG/LQG Waste Consolidation**

- **This new provision helps with managing and shipping of the VSQG hazardous waste more efficiently.**
- **Ensures proper management of the VSQG waste at the LQG site.**

# Requirements for VSQG

40 CFR 262.14(a)(5)(viii)

- VSQG must mark its hazardous waste containers with:
    - the words “Hazardous Waste”
    - an indication of the hazards of the contents of the container
- Such as:
- hazardous waste characteristics
  - DOT labeling/placarding symbols
  - OSHA pictograms
  - NFPA chemical hazard labels

# Indication of the Hazards of the Contents

Examples:





# Requirements for VSQG

- Hazardous waste manifest is NOT required to document the hazardous waste transported from the VSQG to the LQG.
- BUT some form of a shipping document is needed including:
  - name
  - site address
  - contact information for the VSQG
  - description of the hazardous waste
  - quantity of the waste received
  - date the waste was received by the LQG

# Requirements for VSQG

- **Must comply with applicable DOT requirements during transit.**
- **A licensed hazardous waste transporter is not required to transport waste from the VSQG to LQG.**



# Requirements for LQG

40 CFR 262.17(f)

- **LQG must notify the state on the Site ID Form (8700-12) at least 30 days prior to receiving the first shipment of waste from the VSQG.**
  - identify on the form the name(s) and site address(es) of the VSQG(s) and name and phone number of a contact person for the VSQG(s).
  - submit an updated form within 30 days of any changes in the VSQG name or site address.

# Requirements for LQG

- **LQG must maintain shipping records documenting VSQG waste received by the LQG for three years from the date the waste was received.**
- **Accumulation of VSQG waste at LQG site must comply with applicable LQG requirements including marking/labeling of VSQG waste containers (the words “Hazardous Waste”, hazard indicator, and accumulation start date).**

# Requirements for LQG

- The accumulation start date is the date the LQG receives the waste from the VSQG. VSQG waste can be accumulated at the LQG for 90 days from that date.
- If VSQG waste is consolidated with waste generated by the LQG or another VSQG, the accumulation start date must be the earliest date any hazardous waste in the container was accumulated on site.

# Requirements for LQG

- **Manage consolidated waste as LQG hazardous waste and ensure final treatment or disposal is at a RCRA designated facility.**
- **Report VSQG consolidated waste on Hazardous Waste Biennial Report under different code to distinguish between LQG generated waste and VSQG consolidated waste.**

# **VSQG/LQG Waste Consolidation**

**QUESTIONS?**