



Massachusetts
Department
of
ENVIRONMENTAL
PROTECTION

fact sheet

Managing Hazardous Waste at Golf Courses

State law requires Massachusetts golf courses to handle, store and dispose hazardous wastes in specific ways. Complying with these requirements and documenting your compliance is important, because your golf course is potentially liable for cleanup costs if these materials are spilled or released to the environment, whether at your location, during transit, or at the receiving facility.

Wastes and classifications

Golf courses can generate several types of hazardous waste, including:

- *Lawn care products*, including unusable pesticides and herbicides. Look at the Material Safety Data Sheets provided by product suppliers to determine the hazards associated with them. Lawn care products may be listed under discarded commercial chemical products (U group) or acutely hazardous wastes (P group). Empty bags and inner liners with residues of *acutely* hazardous waste and debris from cleanup of a spill of U group or P group wastes are also considered hazardous wastes.
- *Parts cleaners, waste gasoline and paint wastes* typically have flash points of less than 140°F and are classified as *ignitable* (D001). Even if recycled off-site, they are considered hazardous wastes.
- *Gear or engine oil* is classified as *waste oil* (MA01).

For additional information about classifying your wastes, refer to the listings in Hazardous Waste Regulations (310 CMR 30.100, found at www.mass.gov/dep/matrix.htm).

Your generator status and storage limits

Next, you need to determine your status as a generator of hazardous waste. Your status determines how much waste you may accumulate at your site at one time and how quickly you need to ship it off-site for recycling or disposal.

- If you generate less than 220 pounds (approximately 27 gallons) of hazardous waste or waste oil per month and no acutely hazardous waste, you may register with the Department of Environmental Protection (DEP) as a *Very Small Quantity Generator* (VSQG). As a VSQG, you may accumulate up to 2,200 pounds (about 270 gallons) for an indefinite period of time.
- If you generate between 220 and 2,200 pounds per month (approximately 27 to 270 gallons), and/or up to 1 kilogram (2.2 pounds) of acutely hazardous waste per month, you are a *Small Quantity Generator* (SQG) and may accumulate up to 13,200 pounds (1,500 to 1,620 gallons) for no more than 180 days.
- If you generate more than 2,200 pounds (approximately 270 gallons) and/or more than 1 kilogram (2.2 pounds) of acutely hazardous waste per month, you are a *Large Quantity Generator* (LQG). You may accumulate any quantity on-site, but must ship it within 90 days. Please minimize your waste to the best of your ability.

Note: The same numerical thresholds apply to both hazardous waste and waste oil. You may register separately and maintain separate generator status for each, depending on the quantities you generate.

Massachusetts Department of
Environmental Protection
One Winter Street
Boston, MA 02108-4746

Commonwealth of
Massachusetts
Mitt Romney, Governor

Executive Office of
Environmental Affairs
Ellen Roy Herzfelder, Secretary

Department of
Environmental Protection
Robert W. Gollledge, Jr.
Commissioner

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Bureau of Waste Prevention
Business Compliance Division
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This information is available in
alternate format by calling our
ADA Coordinator at
(617) 574-6872.



Storing wastes and planning for emergencies

To contain leaks and spills, you must store hazardous wastes on an outdoor impervious surface with a secondary containment area or on an indoor impervious surface that is not adjacent to a floor drain or other point of discharge to the outdoor environment.

You must secure your storage area against unauthorized access and post it with *Hazardous Waste* signs, as well as keep storage containers in good condition and label them *Hazardous Waste* with the name of the waste, its associated hazard(s) (e.g., corrosive, ignitable, toxic).

Additional requirements:

- If you are an SQG or LQG of hazardous waste, you must label each container with the date that accumulation began.
- If you are an SQG, you must train your employees in waste handling and emergency procedures, provide appropriate emergency response equipment, designate an emergency response coordinator, and notify local authorities of the waste(s) you produce and accumulate on-site.
- If you are an LQG, you must prepare written emergency response and personnel training plans.

Shipping your hazardous wastes

Before shipping your waste with a licensed hazardous waste transporter, you will need to prepare a special shipping paper called a "manifest" to accompany the waste from the time it leaves your premises until the time it arrives at the receiving facility. Transporters can provide manifest forms.

To obtain a site-specific Identification Number (needed to complete a manifest):

- Submit a Generator Registration Form to DEP if you are a VSQG and/or a SQG of waste oil. Download the form at <http://www.mass.gov/dep/bwp/dhm/files/genreg.pdf>. As a VSQG, you may self-assign an identification number: the prefix MV followed by your ten-digit telephone number.
- Apply for a U.S. Environmental Protection Agency (EPA) Identification Number if you are an SQG or LQG. You may use a temporary number – the prefix MP followed by your ten-digit telephone number – until DEP issues your permanent one.

If you have a previously assigned Identification Number and are changing your status, you should continue to use your site's original number. Please note that the Standard Industrial Classification (SIC) Code for golf courses is 7947.

After shipping waste, retain Copy 8 of the manifest and attach Copy 3 once the receiving facility returns it. Mail Copy 6 to DEP, One Winter Street, Boston, MA 02108, Attention: Hazardous Waste Manifest Section. Keep at least Copy 3 of each manifest on file for a minimum of three years. You may discard Copy 8 after the receiving facility returns Copy 3 to you.

If you are a VSQG, you may hire a licensed hazardous waste transporter or transport up to 55 gallons of your own hazardous waste at one time to another generator, recycling facility, or receiving facility that will accept it. You must keep the container tightly sealed, labeled, and secured to the vehicle during transit. Keep a receipt for the shipment in your files.

For more information

- DEP Web site at www.mass.gov/dep/bwp/dhm/dhmpubs.htm for Massachusetts Hazardous Waste Regulations (310 CMR 30.000); Summary of Requirements for Small Quantity Generators of Hazardous Waste; and a list of companies that provide services to hazardous waste generators.
- DEP Business Compliance Division at (617) 292-5898.
- Massachusetts Pesticide Bureau at www.massdfa.org/pesticides/index.htm or (617) 626-1700 for pesticide minimization options, including container recycling and integrated pest management techniques.

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