A Summary of Requirements for Very Small Quantity Generator of Hazardous Waste (VSQGs)

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Introduction

If your facility uses cleaning solvents, oils, inks, paints, acids or alkalines, it is probably generating hazardous waste with one or more of these characteristics:

- Ignitable (catches fire easily, with a flash point lower than 140°F)
- Corrosive (very acidic or basic, with a pH of less than 2.0 or more than 12.5)
- Reactive (unstable, reacts violently with water, potentially explosive)
- Toxic (leaches contaminants into the environment), or
- Listed specifically as "hazardous" by the Massachusetts Department of Environmental Protection (MassDEP).

MassDEP regulations (310 CMR 30.000: Massachusetts Hazardous Waste Regulations) require businesses that generate any of these wastes to properly identify and safely manage them, and to track them from where they are generated to their ultimate destination for recycling, treatment, or disposal.

Facilities generating smaller quantities of hazardous waste are given more compliance flexibility than generators of larger quantities, but still need to safely manage wastes and prevent releases to the environment. You can take advantage of this regulatory flexibility by minimizing the amount of hazardous waste you generate. Use non-hazardous substitutes and reuse or recycle hazardous wastes wherever possible.

Hazardous Waste Generator Status & Storage Limits

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 (MassDEP) 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 different generator status for each, depending on the quantities you generate.

Notification Requirements

Before generating, accumulating, or shipping any hazardous waste and/or waste oil, you must notify MassDEP of your hazardous waste activities by using the U.S. Environmental Protection Agency (EPA) myRCRAid industry application to obtain an identification number (EPA ID).

Find the link here: https://www.mass.gov/service-details/massdep-hazardous-waste-forms#hazardous-waste-generator-ids-and-manifests

You may also use myRCRAid to notify MassDEP that you are relocating, discontinuing your hazardous waste activities, or reporting a change in ownership.

Very Small Quantity Generator (VSQG) Requirements

As a VSQG, you must:

- Never accumulate more than 1,000 kilograms (approximately 2,200 pounds or 270 gallons) of hazardous waste or waste oil at any one time.
- Store hazardous wastes on an outdoor impervious surface with a secondary containment area or an indoor impervious surface that is not adjacent to a floor drain or other point of discharge to the outdoor environment.
- Secure the storage area against unauthorized access and post it with Hazardous Waste signs.
- Keep each storage container in good condition and label it Hazardous Waste with the name of the waste (e.g., toluene, acetone) and its associated hazard(s) (e.g., corrosive, ignitable, toxic).
- Retain records of the type and quantity of waste you generate, and the date and method of treatment, recycling or disposal
- Obtain receipts when you self-transport waste and keep copies of manifests for shipments sent off-site.

Transfer, Treatment & Disposal Options

As a registered VSQG, you may:

- Recycle or treat your own waste, provided the process you describe in your registration is acceptable to MassDEP. (Note: Thermal treatment such as incineration or vaporization is not allowed.)
- Use a licensed transporter and manifest (requires EPA ID) when sending your wastes to a MassDEP licensed or approved hazardous waste treatment, storage, disposal or recycling facility.
- Transport your own waste to another generator that will count your waste with its own, or to a licensed treatment, storage or disposal facility, permitted recycling facility, or community hazardous waste collection center with the operator's permission.

Special Self-Transport Requirements

As a registered VSQG, you may transport your own hazardous waste* if you:

- Transport no more than 55 gallons at one time and keep a copy of your VSQG registration in the vehicle.
- Do not transport incompatible wastes (e.g., alkaline cleaner and battery acid) simultaneously.
- Keep waste containers tightly sealed, properly labeled (see above), and firmly secured to the vehicle.
- Meet all applicable U.S. Department of Transportation (DOT) and Massachusetts Department of Public Safety (DPS) shipping restrictions and container, label, placard and permit requirements. Contact the federal Motor Carrier Safety Administration (617-494-2770) and the State Fire Marshall's Office (978-567-3300) for details.
- Call the 24-hour MassDEP Emergency Response Line at 888-304-1133 in the event of a leak or spill. Look up reporting thresholds at: http://eeaonline.eea.state.ma.us/DEP/MOMHL/hazmat.aspx

* *If you are both a VSQG of hazardous waste and an SQG of waste oil, you may not self-transport waste oil.*

For More Information

- Call the MassDEP Business Compliance Assistance Line: 617-292-5898.
- See https://www.census.gov/eos/www/naics/ for information about North American Industry Classification System (NAIC) codes.