



COMPLIANCE ASSISTANCE GUIDE

* for generators of hazardous waste *

This Guide is meant to help you if your business generates waste oil or other hazardous waste in Massachusetts. This Guide outlines some key steps you can take to make sure you comply with the rules for businesses that generate hazardous waste. If you have questions about these or other environmental matters, please use the contact information and links at the end of this Guide.

- 1) **Determine whether your waste is hazardous.** This is a crucial first step in the proper management of hazardous waste. There are two ways a waste may be identified as hazardous. Your waste may be *listed* in the Hazardous Waste regulations (310 CMR 30.131-136) or it may be defined by its hazardous *characteristic* (ignitability, corrosivity, reactivity, toxicity). Waste oil is a regulated hazardous waste in Massachusetts.
- 2) **Determine your generator status.** Your generator status is a designation that is determined by two activities: the *rate* at which you generate hazardous waste and *how much* you store (accumulate). Based on these factors, you may be classified as a very small (VSQG), small (SQG), or large quantity generator (LQG) of hazardous waste. The following table provides an overview of generator status requirements.

	Very Small Quantity (VSQG)	Small Quantity (SQG)	Large Quantity (LQG)
Total Waste Generated (Monthly)	Less than 100 kg	>100 kg and <1000 kg	>1000 kg
Acutely Hazardous Waste	None allowed	Less than 1 kg (2.2 lbs)	More than 1 kg
Accumulation Limit	Up to 1000 kg	Up to 6000 kg	No limit
Storage Time Limit	No time limit	Up to 180 days	Up to 90 days

NOTE: 100 kg = 220 pounds = 25 to 27 gallons (the actual weight and volume depends on the type of material)

- 3) **Obtain a hazardous waste identification number.** If you operate a business that generates hazardous waste or waste oil, you must register with MassDEP to obtain a permanent identification number for legally generating and accumulating waste. Without this generator identification number, your waste will not be accepted by a licensed hauler or treatment/storage/disposal facility. Use only the number designated for your facility location.
- 4) **Comply with accumulation area standards.**
 - a. Above-ground tanks and containers must be on a surface which does not have any cracks or gaps and is impervious to the hazardous wastes being stored. If containers are stacked, they must be stacked on pallets.
 - b. Area must be secured against unauthorized entry.
 - c. Area must be clearly marked (e.g., by a visible line or tape, or by a fence) and be separate from any locations where hazardous waste is generated.
 - d. Area must be posted with a sign: "HAZARDOUS WASTE" in capital letters at least one inch high.
 - e. An **outdoor** area must have secondary containment, such as a berm or dike, which will hold any spill or leaks at *either* 10% of the total volume of the containers *or* 110% of the volume of the largest container, whichever is larger. Any spillage must be promptly removed.

5) **Comply with standards for containers and tanks.**

- a. Each container and tank must be clearly and visibly labeled throughout the period of accumulation with the following:
 - the words "HAZARDOUS WASTE"
 - the name of the waste (e.g., waste oil, acetone)
 - the type of hazard(s) (e.g., ignitable, toxic, corrosive or reactive)
 - the date on which accumulation began (SQG and LQG Only)
- b. Each container must be in good condition.
- c. Wastes of different types must be segregated.
 - Do not mix waste oil or used fuel oil with other wastes.
 - Do not put incompatible wastes (that may react with one another) in the same container.
 - Do not put wastes in unwashed containers that previously held incompatible wastes.
- d. Separate containers of incompatible wastes by a berm, dike, or similar structure.
- e. Each container holding hazardous wastes must be tightly closed throughout the period of accumulation, except when the waste is being added or removed.
- f. Containers holding ignitable or reactive wastes must be at least 15 meters (50 feet) from the property line. If this is not possible or practical, you must store such containers in compliance with all applicable local ordinances and by-laws. (SQG and LQG Only)
- g. Inspect your accumulation area at least once a week for any leaking or deterioration of your containers. You must have enough aisle space between your containers to allow for inspections. (SQG and LQG Only)

6) **Ship hazardous waste appropriately.** In Massachusetts, every shipment of hazardous waste by a large or small generator must be:

- a. transported by a company licensed to haul hazardous waste and sent to:
 - i. a licensed treatment, storage or disposal facility (TSDF) or
 - ii. a permitted recycling facility, and
- b. accompanied by a shipping document, called the Uniform Hazardous Waste Manifest.
- c. If you are a VSQG and are not using a licensed transporter, but are transporting your own wastes, you may use (but are not required to use) a manifest form. You must, however, keep a record of the type and quantity, as well as the date, of the transport and treatment or disposal of your waste. You will need proof of the receipt of the waste by the facility or generator. You must keep receipts or manifests of waste shipped and records of waste analysis for at least 3 years.

Contact Information and Links:

- Helpful information and guidance about Massachusetts' Hazardous Waste Program at: <http://www.mass.gov/eea/agencies/massdep/recycle/hazardous/>
- Hazardous Waste Regulations (310 CMR 30.000) at: (<http://www.mass.gov/eea/agencies/massdep/recycle/regulations/310-cmr-30-000.html>), or order an official copy from the State Bookstore in Boston (617-727-2834) or Springfield (413-784-1376).
- Call the MassDEP Hazardous Waste Compliance Assistance Line: 617-292-5898.
- Contact the MassDEP Northeast Regional Office at 205B Lowell Street, Wilmington, MA 01887 (<http://www.mass.gov/eea/agencies/massdep/about/contacts/northeast-region.html>), or by telephone at 978-694-3200.