



Hazardous Waste Requirements

For
Small Quantity
Generators of
100 to 1000
kg/mo



From The
Small Business
Ombudsman

SMALL BUSINESS HOTLINE (800)368-5888

* Updated Exception Reporting
added, September 23, 1987

In 1976, Congress enacted the Resource Conservation and Recovery Act (RCRA) to protect human health and the environment from improper waste management practices. In issuing hazardous waste regulations under RCRA, the Environmental Protection Agency (EPA) first focused on large generators who produce the greatest portion of hazardous waste. Regulations EPA published on May 19, 1980, exempted "small quantity generators"—establishments producing less than 1000 kilograms of hazardous waste in a calendar month—from most of the hazardous waste requirements.

On November 8, 1984, however, the Hazardous and Solid Waste Amendments (HSWA) were signed into law. These amendments to RCRA directed EPA to establish new requirements for small quantity generators who produce between 100 and 1000 kilograms of hazardous waste in a calendar month. EPA issued final regulations for these 100 to 1000 kg/mo generators on March 24, 1986, making the effective date of these requirements September 27, 1986.

In general, the new regulations for 100 to 1000 kg/mo generators are based upon the existing hazardous waste regulatory program. To lessen the burden on the small businesses which are most likely to be affected by these new regulations, EPA has exempted 100 to 1000 kg/mo generators from some of the administrative and paperwork requirements applicable to larger generators (1000 or more kg/mo). Here are answers to some basic questions about the new requirements:

Q Who is affected by these new regulations?

A Establishments that generate from 100 to 1000 kilograms (approximately 220 to 2200 pounds) of hazardous waste in any calendar month. (Depending upon the weight of the contents, this amount is approximately one half-full to five full 55-gallon drums.)

Q What kinds of businesses are likely to be 100 to 1000 kg/mo generators?

A Vehicle maintenance establishments (such as garages, paint and body shops, and car dealerships), metal manufacturers, printers, laundries and dry cleaners, chemical manufacturers and formulators, laboratories, equipment repair shops, construction firms, textile manufacturers, pesticide applicators, and

schools are among establishments likely to produce small quantities of hazardous waste. Based on a March 1985 survey of small quantity generators, EPA estimates that there are approximately 100,000 businesses which would be affected by the new regulations.

Q What new requirements must 100 to 1000 kg/mo generators meet?

A By September 22, 1986, 100 to 1000 kg/mo generators must:

- Obtain a U.S. EPA Identification Number.
- Use the full Uniform Hazardous Waste Manifest system when shipping hazardous waste off-site.
- Offer wastes only to hazardous waste transporters who have U.S. EPA Identification Numbers.
- Accumulate waste on-site for no more than 180 days, or 270 days if the waste is to be shipped more than 200 miles, unless they obtain a hazardous waste permit.
- Ensure that their hazardous waste is managed at a hazardous waste facility with interim status or a permit under RCRA.

Q Are these the only new requirements that 100 to 1000 kg/mo generators must meet?

A Not necessarily. While the items listed above briefly identify the basic new federal requirements for 100 to 1000 kg/mo generators, the actual requirements which go into effect on September 22, 1986 are more detailed. In addition, some states may impose more stringent requirements on small quantity generators. For example, four states (California, Louisiana, Minnesota, and Rhode Island) now fully regulate all generators of hazardous waste, 100 to 1000 kg/mo generators as well as larger and smaller generators. To be sure you understand all the requirements, state and federal, that you must meet, contact your state hazardous waste management agency.

Q What is a U.S. EPA Identification Number, and how do I obtain one?

A A U.S. EPA Identification Number is a unique, 12-character number that EPA assigns to generators and transporters of hazardous waste, and to owners/operators of facilities that treat,

store, or dispose of hazardous waste. The identification numbers help EPA and states compile and maintain a database on hazardous waste activities.

To obtain an EPA Identification Number, you should complete EPA Form 8700-12, "Notification of Hazardous Waste Activity," or a similar form used by your particular state. To request the application form, contact your state hazardous waste management agency or EPA Regional Office. Along with the appropriate application form, you will receive instructions for completing the form and information on where you can get additional assistance.

Q Where do I obtain the Uniform Hazardous Waste Manifest to use when I ship my hazardous waste off my plant site?

A A hazardous waste manifest is a multi-copy form that you must fill out completely and use to accompany your hazardous waste shipments. Some states print their own versions of the Manifest with the state's name and logo and require use of the state Manifest form. These forms are available from state hazardous waste management agencies. Many transporters and facilities may also be able to provide you with the correct Manifest.

To determine which state's Manifest form you need to complete, use this system: (1) If the state to which you are shipping your waste has its own Manifest, use that Manifest form (2). If not, use the Manifest of the state in which your waste was generated. (3) If neither state requires a state-specific Manifest, you may use the "general" Uniform Hazardous Waste Manifest—EPA Form 8700-22—which you can purchase from some commercial printers, or obtain from some transporters or waste management facilities.

Q What information is required on the Manifest?

A Effective September 22, 1986, federal law requires 100 to 1000 kg/mo generators to fill out all of the unshaded items on the Uniform Hazardous Waste Manifest. (The completed Manifest will also fully satisfy Department of Transportation requirements for shipping hazardous materials.) Even now, some states require generators to complete the entire Manifest, or to provide information beyond the items 3, 9, 11, 12, 13, 14, and 16 required under federal law as of August 5, 1985. To be sure you complete all necessary parts of the Manifest, contact your state hazardous waste agency, your transporter, and your receiving facility.

Q Why are there multiple copies of the Manifest?

A The Manifest form is designed so that shipments of hazardous waste can be tracked from their point of generation to their final destination, the so-called "cradle-to-grave" system. The Manifest is produced in a multi-copy format so that each step in the shipment process can be documented. Thus, the generator of the hazardous waste completes the Manifest, and turns the shipment and remaining copies of the Manifest over to the transporter. The transporter or hauler signs the Manifest, returns one copy to the generator, and turns the shipment and Manifest over to the facility that the generator designated to receive the waste. The facility signs the Manifest, gives one copy back to the transporter, keeps a copy, and sends the remaining copy back to the generator so the generator knows that the hazardous waste has reached its intended destination. Some states require that a copy of the Manifest also be sent to the state hazardous waste agency each time a shipment changes hands. Generators are required to keep a copy of each Manifest, signed by the designated facility, in their files for three years following the date of the shipment.

Q What if the generator does not receive a final copy of the Manifest confirming the facility's receipt of the shipment?

A Under the new Federal Regulations, 100 to 1,000 kg/mo (small quantity) generators must notify on non-receipt of signed manifests after 60 days, rather than 45 days as required for the large quantity generators (i.e., those of over 1,000 kg/mo).

• The small quantity generators may make notification by hand written annotation on a copy of the original manifest, rather than by a cover letter as is required for the large quantity generator.

• The notification, as described above, is all that is required for the small quantity generator, whereas the large quantity generator must take steps to ascertain the status of the waste shipment in the event of non-receipt of the signed copy of the manifest.

Q How often should generators ship hazardous waste off their premises?

A Larger generators must ship their waste off-site at least every 90 days to avoid having to obtain a hazardous waste facility permit. The final regulations allow 100 to 1000 kg/mo generators to accumulate hazardous waste on-site for 180 days (or up to 270 days if the waste is to be shipped more than 200 miles) without the need for a permit so that generators may accumulate more economical quantities for shipment. Some states, however, allow only a 90-day accumulation period, even for 100 to 1000 kg/mo generators. Check with your state hazardous waste agency for information on the requirements that apply to you.

Q Where can I send my waste, and who can haul it?

A Since hazardous waste from 100 to 1000 kg/mo generators must be managed according to RCRA hazardous waste rules, only transporters and facilities which have EPA identification numbers can handle your hazardous waste. Furthermore, they must be authorized to handle your particular kind of hazardous waste. For information on hazardous waste transporters and management facilities in your area, contact your state hazardous waste agency or EPA regional office.

Q May I recycle my hazardous waste?

A Yes. In fact, EPA strongly encourages recycling as one of the best methods for managing hazardous waste. Waste shipped off-site for recycling may still be subject to manifesting as well as other transportation and storage requirements. These requirements, however, are not intended to discourage recycling. Contact your state hazardous waste agency, EPA regional office, or trade association for information on your specific waste recycling alternatives.

Q Where can small quantity generators get further information and assistance?

A Generators should contact their state hazardous waste agencies for information on the requirements they must meet. For questions on the new federal requirements or hazardous waste regulations in general, or to obtain the number for their state hazardous waste agencies, generators may wish to contact their EPA Region.

US EPA REGIONAL OFFICES

Region I

[Geographic Area: Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont]

USEPA Region I
Office of Site Remediation and Restoration
JFK Federal Bldg., Room 2203
Boston, MA. 02203-2211

(617) 918-1361
[General Info (617) 918-2000]

Region II

[Geographic Area: New Jersey, New York, Puerto Rico, Virgin Islands]

USEPA Region II
RCRA Programs
290 Broadway - 22nd Floor
New York, NY 10007-1866

(212) 637-4106 TF: ((212) 637-4949)

Region III

[Geographic Area: Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia]

USEPA Region III (3WC11)
Office of RCRA Programs
1650 Arch Street
Philadelphia, PA 19103

(215) 814-3408
[Gen. Inf. (800) 438-2474]

Region IV

[Geographic Area: Alabama, Florida, Georgia, Kentucky, Mississippi, North & South Carolina, Tennessee]

USEPA Region IV
Waste Management Division
61 Forsyth Street, SW
Atlanta, GA 30303

(404) 562-8651
[Gen. Info. (800) 241-1754]

Region V

[Geographic Area: Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin]

USEPA Region V (DM-7J)
RCRA Activities
(PO Box A3587-60690)
77 West Jackson Blvd.
Chicago, IL 60604

(312) 886-4001
[Gen. Info. (800) 621-8431]

Region VI

[Geographic Area: Arkansas, Louisiana, New Mexico, Oklahoma, Texas]

USEPA Region VI
RCRA Information Management (6PD-1)
First Interstate Bank Tower
1445 Ross Ave., Ste. 1200
Dallas, TX 75202-2733

(214) 665-6750 (800) 887-6063
TF (214) 665-6762/3

Region VII

[Geographic Area: Iowa, Kansas, Nebraska, Missouri]

USEPA Region VII
RCRA Corrective Actions and Permits Branch
901 N.5th St.
Kansas City, KS 66101

(913) 551-7665 TF: (913) 551-7947
[Gen. Info. (800) 223-0425]

Region VIII

[Geographic Area: Colorado, Montana, North & South Dakota, Utah, Wyoming]

USEPA Region VIII
8ENF-T
999 18th Street
Denver, Colorado 80202

(303) 312-6849
[Gen. Info. (800) 227-8917]-Region 8 States, only

Region IX

[Geographic Area: Arizona, California, Hawaii, Nevada, American Samoa, Guam, North Mariana Islands]

USEPA Region IX
RCRA Notification PRC-WST-6
75 Hawthorne Street
San Francisco, CA 94105

(415) 495-8895 [RCRA Info Ctr.: (415) 744-2074]
[Gen. Info. (800) 231-3075]*

Region X

[Geographic Area: Alaska, Idaho, Oregon, Washington]

US EPA Region X (WCW - 126)
Office of Waste & Chemical Management
1200 Sixth Avenue
Seattle, Washington 98101

(206) 553-2859
[(800) 550-7272 Alaska only]

* Site Clean-up Calls, only

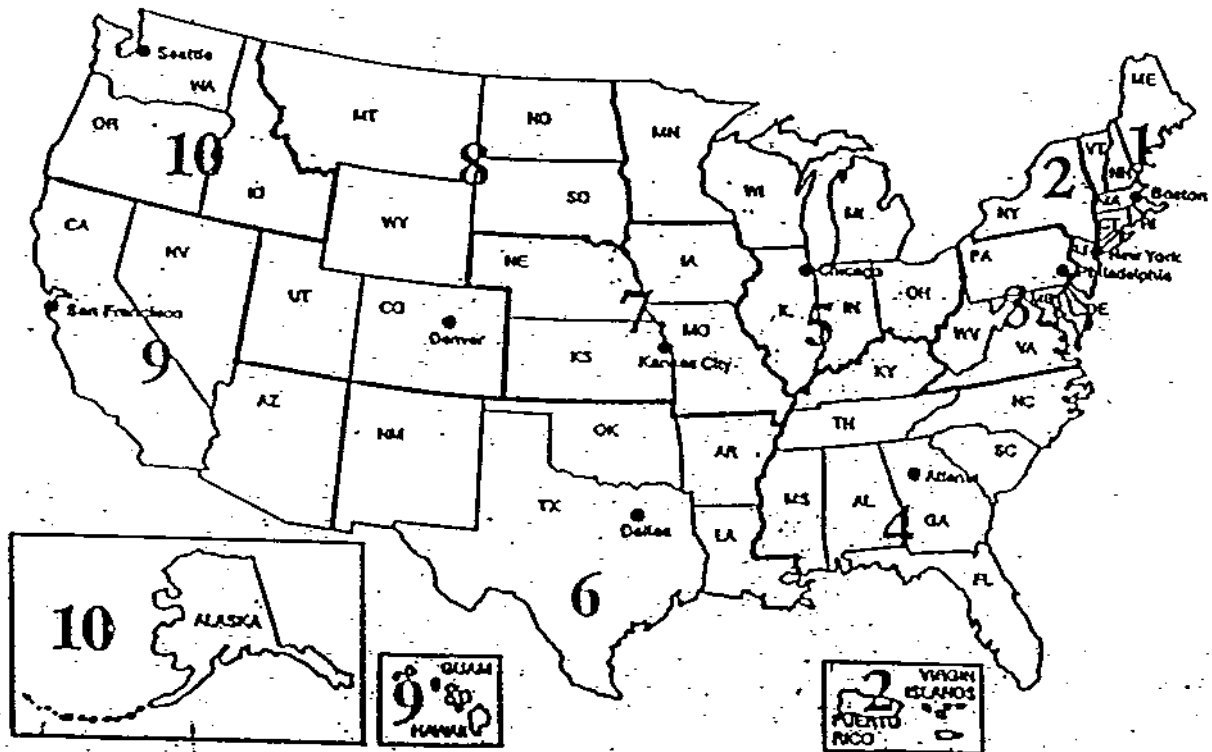
RCRA/Superfund Hotline
1-800-424-9346

EPA Small Business Ombudsman
Hotline 1-800-368-5888

National Response Center
1-800-424-8802

(In D.C. Area, 703-412-9810)

(In D.C. Area, 202-260-1211)



Regions	Regions	Regions	Regions
4 - Alabama	10 - Idaho	8 - Montana	1 - Rhode Island
10 - Alaska	5 - Illinois	7 - Nebraska	4 - South Carolina
9 - America Samoa	5 - Indiana	9 - Nevada	8 - South Dakota
9 - Arizona	7 - Iowa	1 - New Hampshire	4 - Tennessee
6 - Arkansas	7 - Kansas	2 - New Jersey	6 - Texas
9 - California	4 - Kentucky	6 - New Mexico	8 - Utah
8 - Colorado	6 - Louisiana	2 - New York	1 - Vermont
1 - Connecticut	1 - Maine	4 - North Carolina	3 - Virginia
3 - Delaware	3 - Maryland	8 - North Dakota	10 - Washington
3 - D.C.	1 - Massachusetts	5 - Ohio	2 - Virgin Islands
4 - Florida	5 - Michigan	6 - Oklahoma	3 - West Virginia
4 - Georgia	5 - Minnesota	10 - Oregon	5 - Wisconsin
9 - Guam	4 - Mississippi	3 - Pennsylvania	8 - Wyoming
9 - Hawaii	7 - Missouri	2 - Puerto Rico	