Community Collections of Very Small Quantities of Hazardous Wastes from Businesses

In 1995, the Wisconsin Department of Natural Resources issued interim guidance regarding the collection of household and VSQG wastes, and operations of permanent household hazardous waste collection programs. This guidance is designed to improve the efficiency and cost effectiveness of community collection programs and allow for the participation of businesses classified as Very Small Quantity Generators (VSQGs) of hazardous waste in those programs.

This fact sheet is intended to provide new and existing programs with an overview regarding the operation of programs serving VSQGs. Typically, VSQG businesses include health care facilities, printers, auto repair shops, agribusiness coops, and dry cleaners. The following information is addressed in this fact sheet:

- Definition & determination of VSQG status
- Setting up a community program
  - Regulatory requirements
  - Selecting a contractor
  - Publicity
  - Pre-registration
  - Community requirements - training, storage, and record keeping
  - Liability issues
  - Fee support for program operations
  - VSQG transportation guidelines
- Other operational tips
- Special provisions for agricultural small business
- Other program options

---

1 See “Operating a VSQG Program” for detailed information, available from AETS, 1-786-276-8190
Why should a community include VSQG wastes in their program?

There are several reasons that community hazardous waste collection programs should accept VSQG wastes. These include:

1. VSQGs are a significant source of hazardous waste. For example, it is estimated that there are twice as many VSQGs in Wisconsin as compared to other generators of hazardous wastes. Often it is not convenient or economical for VSQGs to dispose of hazardous wastes in the same fashion as larger business generators. With limited and expensive disposal options, there exists a need to provide alternative collection and disposal programs.

2. VSQGs can increase participation in community collection programs and may serve as a potential revenue source for community programs, helping to offset the cost of operating household collection programs.

What is a Very Small Quantity Generator?

Very Small Quantity Generators (VSGQs) are defined by federal and state law as meeting one of the following conditions:

1. On a monthly basis, generate
   a. Less than 100 kg (220 pounds) of hazardous waste; and
   b. 1 kg (2.2 pounds) or less of acute hazardous waste; and
   c. 100 kg (220 pounds) or less of acute hazardous waste spill material; and

2. Limit total site accumulation of wastes to
   a. 1000 kg (2205 pounds) or less of hazardous waste; and
   b. 1 kg (2.2 pounds) or less of acute hazardous waste; and
   c. 100 kg (220 pounds) or less of acute hazardous waste spill material.

The Marathon County Experience

In the summer of 1995, Marathon County operated a permanent collection program and allowed participation by VSQGs. They found that many businesses participated and paid for the service, where in the past they would have disposed of materials as either residents or through a contractor. Disposal costs for the typical VSQG business was 25-50% less than an on-site pickup.

Hazardous wastes are either listed wastes (as defined in NR 605.09 Wis. Adm. Code) or characteristic hazardous waste, which include wastes which are:

- **Ignitable** - such as paint wastes, certain degreasers and solvents, adhesives, thinners, pesticides mixed with solvents, & mineral spirits.
- **Corrosive** - such as rust removers, acid or alkaline cleaning fluids, and battery acids.
- **Reactive** - such as cyanide plating wastes, sulfide containing wastes, and toluene disocyanate.
- **Toxic** - contains chemical such as arsenic, chromium, mercury, lead, cadmium, etc. and includes paints with metal pigment, paint filters, and pesticides.

A community may also prefer to collect and handle solid wastes, such as latex paint and household cleaners, at a hazardous waste collection site.
Businesses that generate more than these amounts of hazardous wastes are either small quantity or large quantity generators and are required to report their waste generation to the Wisconsin DNR (608-226-2621). For more information on hazardous waste, request Very Small Quantity Generator Basic Requirements, WI Department of Natural Resource (publication No. WA295)

### Setting up a community program for VSQG waste

Wisconsin communities have several choices for operating a collection program. Typically these include: 1) one day “Clean Sweep” temporary collection events, 2) permanent collection programs which provide drop-off services at least monthly at a specific location, and 3) a combination of a centrally located permanent collection site and mobile collection service for outlying areas. The choice of which type of program to operate will depend upon the community’s needs and budget. In addition, communities should carefully weigh the role played by their staff vs. the roles of a hazardous waste transport and disposal contractor.

### Regulatory issues

Communities that accept VSQG waste at permanent collection programs should:

- Obtain an EPA identification number\(^2\), which formally notifies the EPA and Wisconsin DNR that you are handling hazardous waste.
- Develop and provide educational programs and literature for customers to minimize waste.
- Provide an annual report by March 1 of each year to the DNR.
- Maintain records which certify the VSQG status (see Record Keeping below).

Permanent collection programs should also hold an informational meeting prior to siting a new facility and comply with a number of management practices. These are drawn from existing regulations that apply to a licensed hazardous waste storage facility or large quantity hazardous waste generators. However, no license is necessary and no treatment is allowed (except bulking, neutralization, or use of absorbents). An operational manual must be developed which includes the following:

- worker training
- amount of storage
- record keeping
- emergency planning
- storage practices
- building design

Household hazardous waste removed from a collection facility may not be returned there. Licensed Wisconsin landfills may establish a permanent collection facility without obtaining a special license or modifying their current landfill plan. For detailed operational information, see Chapter NR 666, Subchapter H, Wisconsin DNR; call 608-246-7981). Finally, temporary collection programs should carefully consider and plan for these issues in order to minimize future liability.

\(^2\) Identification numbers are available by completing an EPA Notification of Regulated Waste Activity Form (EPA 8700-12(07-90). Contact your local DNR district for copies.
Selecting a contractor

Selection of an appropriate transport and disposal contractor for VSQG wastes is an important component of a permanent collection program. One option is to “piggyback” on the State of Wisconsin’s hazardous waste contract for collection and disposal services. Another option is to develop a request for proposal, identifying the key services to be provided, and solicit bids for this service. In either case, the contractor must be a licensed transport and disposal company with the ability to manage hazardous wastes successfully.

Publicity

Effective publicity can help assure broad participation by very small businesses. Programs are encouraged to utilize all traditional mass media sources to alert VSQGs of the program. In addition, chambers of commerce and trade and business associations should also be notified of the time, date, and location of the collection program. For more information on how to reach out to small businesses, contact your County UW-Extension Community Resource Development Agent.

Pre-registration

It is strongly recommended that VSQG services be offered on a “pre-registration” basis, since a significant amount of communication is required between the waste transporter and generator. The VSQG will be required to send a chemical inventory, stating the name, amount, container type, physical state of the chemical, and the container condition. This inventory will determine the disposal fees paid by the VSQG, so it is important to list accurate weights of chemical in original containers.

Community requirements - training, storage, and record keeping

Training

Staff training is critical to the successful operation of the program. All personnel operating facilities should participate in a training program which includes an understanding of hazardous waste management practices, familiarity with emergency procedures, and knowledge of multiple jobs required for a successful program. The hazardous waste disposal contractor can often facilitate these training sessions.

Storage of chemicals

Temporary collection programs are limited to 3 days for storage of hazardous wastes. Permanent programs may store wastes for no longer than one year from the date of acceptance, or until the facility is temporarily closed for the season. Program operators must also maintain adequate security, provide sufficient aisle space, maintain containers in good condition, provide for compatibility of wastes under proper management, and provide for secondary containment in the case of spills.

---

3 Information regarding the State contract may be obtained by contacting the WI Department of Administration at 608-266-2953.
Record Keeping

Once a community/spONSOR decides to accept wastes generated by VSQGs, certain records should be kept. These include:

- Receipts provided to the VSGQ which include:
  - the VSQG's name, address, and county;
  - type of hazardous waste received, hazardous waste code, quantity and units of measure;
  - date of receipt; and
  - a dated certification statement (see sample) signed by the VSQG declaring their status as a VSQG.

- Material disposal manifests
- Annual activity reports

In addition to these records, permanent programs should maintain a database of VSQG participants which includes the information described above. This can be used to monitor participation, as well identify potential opportunities for further waste reduction.

Liability Issues

Acceptance of VSQG waste potentially increases the liability of the host community/spONSOR regarding proper disposal of these materials. In order to minimize future liability issues, programs should:

- accept only readily identifiable wastes;
- provide ample opportunities for recycling or exchanging wastes for beneficial reuse; and
- designate the disposal contractor as the “waste generator,” if possible.

Programs should follow best management practices in order to maintain site cleanliness and reduce the potential for spills.

Fee support for program operations

As waste generators, businesses should assume the responsibility for paying for disposal of these wastes. Acceptance of VSQG wastes may reduce the costs for operating a household hazardous waste program. A site access fee (10-20%) for program management may be included in addition to the actual disposal and handling cost incurred by the disposal contractor. Fees should be determined based upon actual contractual costs, as well as additional costs related to publicity, public education, program support, etc.
VSQG transportation guidelines

Critical to successful collection of VSQG waste is the safe transport to the collection facility. VSQGs may transport sample label wastes to a licensed or approved management or collection facility in Wisconsin without a hazardous waste transportation license, but must follow Department of Transportation requirements.

At a minimum, VSQGs should be instructed to do the following:

- segregate and package the wastes in separate boxes, keeping compatible chemicals together;
- label each box according to hazard category; and
- complete a bill of lading indicating the contents of each box, which is to be taken in the vehicle to the collection site.

Operational Tips

Communities operating permanent collection programs should develop an operations manual which describes the overall program operation, including health and safety practices. Operating a VSQG collection program, a manual for program operators, provides detailed information regarding management of hazardous wastes. Key points include the need to preregister all VSQGs, inform VSQGs of proper packaging and transportation of hazardous wastes, and provide for onsite management of wastes. Contact any of the key contacts to obtain a copy of this document.

Special provisions for agricultural small businesses

Agricultural small businesses meeting certain requirements may also participate in Agricultural Clean Sweeps. In addition to being a VSQG, these businesses must:

- fit licensing categories regulated by the Department of Agriculture under ATCP 29 (such as aerial applicators, co-operatives, landscape companies, structural application firms, rights-of-way applicators, and golf courses and
- have an individual with direct business or property tie (e.g. owner, employee, or site manager) drop off materials.

Sample bill of lading for solvents

<table>
<thead>
<tr>
<th>Flammable Liquid</th>
<th>2 x 1 qt</th>
<th>acetone</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>3 x 1 gal</td>
<td>mineral spirits</td>
</tr>
</tbody>
</table>
Only pesticides disposal and transport costs will be eligible for subsidies provided by the Department of Agriculture, Trade, and Consumer Protection.

Other program options

Material Exchanges

Unopened materials can serve as a good resource for community groups, as well as other businesses. These materials should be stored in a separate section of the facility (preferably heated) and provided to interested parties on an as needed basis.

Paint Bulking

Paint is the greatest quantity of material in a typical collection program. Many communities have found it helpful to bulk latex paint into 5 gallon containers for recycling. Dark colors should be combined with other dark colors, while light colors can be combined to form a “contractor’s grey,” which is often suitable as a primer. Care should be taken to avoid contaminated paint, as well as lead based paints which should be disposed of properly by a hazardous waste contractor.

Ongoing Support

For further information regarding management and operation of a HHW/VSQG collection program, contact:

For UW-Extension  Steve Brachman, Specialist  P 414-227-3160 or Your local County Community Development Agent

For the Department of Agriculture, Trade & Consumer Protection  John Petty, Administrator of Agricultural Management  P 608-224-4567

For the Wisconsin Department of Natural Resources  Your regional Waste and Materials Management Program Associate  W http://dnr.wi.gov/topic/Waste/EPAs.html

Updated 07/2012 by Steve Brachman, Solid & Hazardous Waste Specialist
Editing assistance by Lyndsay Gavin, SHWEC Intern