VERY SMALL QUANTITY GENERATORS (VSQG) OF HAZARDOUS WASTE

Know Your Waste and What You Can Do To Save Yourself Money, Time, Paperwork and Headaches

As small businesses focus on increasing profits, it has become increasingly important to manage hazardous wastes carefully and efficiently. This fact sheet will help you:

- Identify if you are a very small quantity generator of hazardous wastes;
- Develop best management practices for these wastes, and
- Evaluate waste reduction options in order to minimize costs and liabilities.

Why should a business care?
Businesses that use hazardous materials or generate hazardous wastes can incur a variety of costs, risks or community image challenges such as:

- Raw material losses
- Employee exposure and sick time
- Air emissions
- Product quality expectations
- Waste storage space
- Liability
- Waste handling time
- Disposal costs
- Record keeping or reporting
- Community image tarnished

Even when these issues may not seem significant for some businesses that have hazardous materials in very small quantities, it can become a competitive disadvantage. Other businesses that innovate or implement alternatives that reduce or eliminate hazardous materials can gain a competitive edge and a better image in the community.

What is a hazardous waste?
Any solid, liquid or contained gaseous material that is no longer used and is intended for disposal or off-site recycling may be considered a waste. It is considered hazardous if it is a listed waste (defined in NR 661 Wis. Adm. Code) or if it is a characteristic hazardous waste in terms of being ignitable, corrosive, reactive or toxic (defined in NR 661.22, NR 661.23, and NR 661.24).

Examples:

- **Ignitable** - paint wastes, certain degreasers and solvents, adhesives, thinners, and mineral spirits
- **Corrosive** - rust removers, acid or alkaline cleaning fluids, and battery acids
- **Reactive** - cyanide plating wastes, sulfide containing wastes, and toluene disocyanate
- **Toxic** - any material which contains chemicals such as arsenic, chromium, mercury, lead, cadmium, etc. Also, paints with metal pigment, paint filters, and some pesticides
What is a Very Small Quantity Generator?
Generator status includes very small quantity generators (VSQG), small quantity generator (SQG) and large quantity generator (LQG). Status is determined by the amount of hazardous waste generated per calendar month, accumulation on-site and whether the hazardous waste is acute or not. Acute hazardous wastes pose significant threats to human, plant and animal life. Many pesticides fall into this category. The following conditions describe the limits of a VSQG:

A. Monthly Generation
- Less than 100 kg (220 pounds) of hazardous waste
- 1 kg (2.2 pounds) or less of acute hazardous waste
- 100 kg (220 pounds) or less of acute hazardous waste spill material

B. Store or accumulate
- 1000 kg (2205 pounds) or less of hazardous waste (approximately five 55-gallon drums)
- 1 kg (2.2 pounds) or less of acute hazardous waste
- 100 kg (220 pounds) or less of acute hazardous waste spill materials

Businesses exceeding the limits in any of these categories of hazardous waste generation, fall into the SQG or LQG categories, and are required to report their waste generation to the Wisconsin Department of Natural Resources (DNR).

How can I tell if my wastes are hazardous & subject to federal & state regulations?
Using the criteria above,
1) Determine if the wastes are listed or exhibit hazardous waste characteristics.
2) Check all waste sources in your business and total the amounts to see if your business is classified as a VSQG.

You may also check with your suppliers, including invoice descriptions, container labels or Material Safety Data Sheets (MSDS) for information about the characteristics of the chemicals you use. Additional information can be gained by contacting other businesses like yours or through trade associations.

The table below lists common hazardous wastes generated by some businesses.

<table>
<thead>
<tr>
<th>Business Type</th>
<th>Typical Hazardous Waste</th>
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<tbody>
<tr>
<td>Auto or Body Repair</td>
<td>mineral spirits, 1,1,1-trichloroethane, toluene, xylene</td>
</tr>
<tr>
<td>Painters</td>
<td>toluene, xylene, methylene chloride</td>
</tr>
<tr>
<td>Dry Cleaner</td>
<td>perchloroethylene, valclene</td>
</tr>
<tr>
<td>Electroplater</td>
<td>spent cyanide plating, cleaning and bath solutions, sludges</td>
</tr>
<tr>
<td>Metal Fabricator</td>
<td>spent cyanide heat treating bath solutions, quenching wastewater, sludges</td>
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<tr>
<td>Photographers</td>
<td>used developer</td>
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For any final determination of your generator status, contact the DNR. If you exceed the specified limits, contact the DNR for additional reporting requirements.
• **What are the reporting requirements for VSQG’s and, what must a VSQG do?**

A VSQG should do the following:

- Determine if your waste is hazardous
- Comply with generation and accumulation limits
- Properly manage or dispose of hazardous waste at an approved hazardous waste facility
- Package, mark and label wastes according to the U.S. Department of Transportation requirements
- Use a WI DNR licensed transporter (or self-transport to a local household hazardous and VSQG facility)
- Obtain EPA identification number through the DNR if your transporter requires hazardous waste manifesting.

Under state and federal law, there are no reporting requirements for VSQG’s. However, new guidelines for permanent household hazardous waste collection programs apply if you are a participating small businesses.

- Contact the host or sponsoring organization to obtain the name and phone number of the waste disposal contractor;
- Call the contractor to set up an appointment for drop-off of the material, and to identify and list the types and amounts of waste;
- On the day of collection, package wastes according to the instructions provided by the contractor and transport to the site;
- At the collection site, you will be asked to complete a form which certifies that you are a VSQG; and
- Provide payment with either a certified check or credit card.

• **Why avoid becoming a Small Quantity Generator (SQG)?**

If your business is growing while using the same processes that generate hazardous wastes, there is the risk of becoming a SQG. All you have to do is exceed the 220 pound limit for one month and you will be classified as a SQG for the entire year. Then the regulatory burden becomes much more significant. An EPA identification number is required, record keeping and reporting requirements apply, an annual report must be given to DNR, and emergency procedures must be established for leaks, spills or fires involving hazardous waste.

• **How can a VSQG reduce or eliminate waste?**

The options to reduce or eliminate waste vary by type of business, and several basic strategies can be employed. One effective starting point is to develop a waste prevention plan or program which focuses on strategies such as those listed below.

- Use materials more efficiently
- Use alternative processes
- Better manage inventory
- Reduce packaging
- Reuse containers
- Recycle wastes on site
- Use less toxic or hazardous materials
- Use vendors to find alternatives
- Provide employee training
- Seek employee input

• **Community Benefit**

In addition to the potential business benefits for innovative solutions to reduce or eliminate hazardous materials, your local community can realize a number of benefits. Pride in quality products and services of local businesses and respect for a business’ environmental leadership can promote a first-rate image in the community. Rather than being a target of citizen activism regarding environmental issues, let your business be a leader in waste reduction and recycling.
Where can a VSQG get technical help?

- Trade associations and vendors are often good sources for new ideas.
- UW Extension Community Resource Development Agents, Area Business Agents and Small Business Development Centers can help access educational, technical and regulatory resources.
- Hazardous waste regulatory questions can be directed to the Wisconsin Department of Natural Resources (DNR) (888-936-7463) or your regional office. [http://dnr.wi.gov/topic/Waste/Hazardous.html](http://dnr.wi.gov/topic/Waste/Hazardous.html)
- Air emission questions can be directed to the Small Business Clean Air Assistance Program at the Wisconsin DNR. [http://dnr.wi.gov/topic/CompAssist/sb/](http://dnr.wi.gov/topic/CompAssist/sb/)
- The Solid and Hazardous Waste Education Center (SHWEC) offers free, non-regulatory assistance on waste reduction. For more information about SHWEC, call 414-227-3160, email shwec-help@uwm.edu or contact your County Extension office. [www.uwex.edu/shwec](http://www.uwex.edu/shwec)

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