Stuck in the Middle? Navigating Changing Generator Status

TH-B2

March 27, 2025

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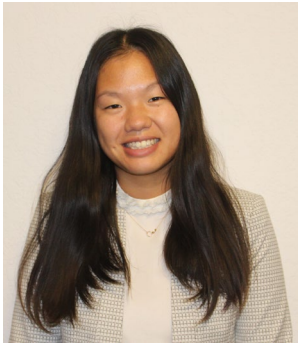
27th California Unified Program
Annual Training Conference
March 24-27, 2025

Agenda

- Trinity/Speaker Introduction
- Background
- Potential Scenarios for Changing Generator Status & How to Avoid
- SQG vs LQG Key Differences
- Best Practices

Speaker Introduction



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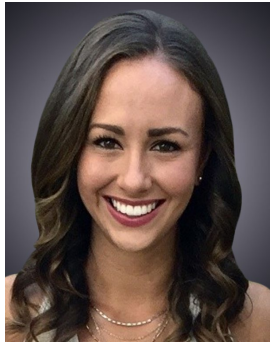

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About Trinity Consultants

Started in 1974 by **one consultant** in Dallas, Texas, serving clients' **air quality** regulatory compliance needs.

Today, we are **nearly 1,700 employees** in more than **85 locations** on **four continents.**

We help organizations overcome complex, mission-critical **EHS, engineering, and science** challenges through **consulting, technology, training, and staffing** support.

About Trinity Consultants

AIR QUALITY

Air quality permitting and compliance support with federal and state/local regulatory requirements.

ESG, EJ AND SUSTAINABILITY

Comprehensive ESG and sustainability program support for companies across many industries.

EHS MANAGEMENT

Trinity's EHS Performance & Risk Management team assists in addressing EHS challenges from various perspectives - strategic planning, program evaluation, and systems development.

WASTE MANAGEMENT

Provides regulatory waste management support for industrial facilities.

CHEMICAL COMPLIANCE

Compliance support for chemical-related compliance and reporting requirements.

EHS LITIGATION SUPPORT

Provides technical support and expert testimony for legal issues regarding air quality, noise impact, industrial air quality and weather-related litigation.

HEALTH AND SAFETY

Support with OSHA, EPA, and local/state agencies regulations that protect the health and safety of workers and surrounding communities.

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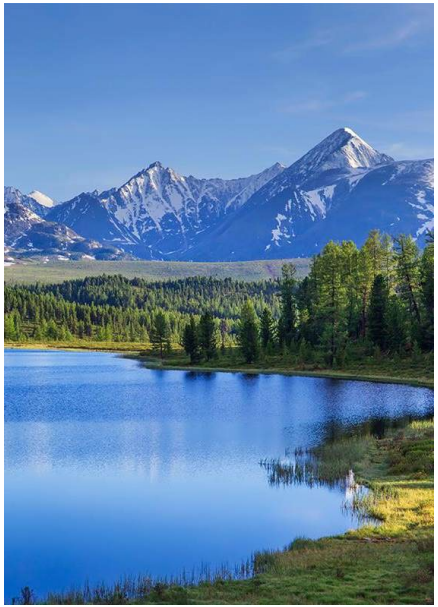
Water quality permitting, compliance, and sampling.



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Background

- Determining Generator Status
- SQG & LQG Requirements

What is your generator status?

- SQG
- LQG
- Fluctuates

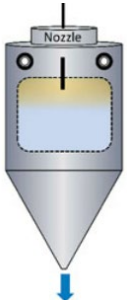
Generator Status Determination

- Generator status is based on how much is **generated** in a calendar month
- Document:
  - The quantity of **hazardous waste** generated each month
  - The quantity of **acute hazardous waste** generated each month **(count separately)**
  - The quantity of **acute hazardous waste spill residue** generated each month

What is the point of generation?

- When is the waste generated?
- Where, physically, does the waste become subject to haz waste regulations?

Expired & Discarded



POG

Manufacturing Process

Lead Paint Removed from Wall

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Generator Status Determination

Generator Category	Quantity Generated in a Calendar Month		
	Hazardous Waste	**Acute HW**	**Extremely HW**
LQG	Any amount	**>2.2 lbs**	Any amount
LQG	**2,200 lbs**	Any amount	Any amount
LQG	Any amount	Any amount	**>2.2 lbs**
SQG	**<2,200 lbs**	≤2.2 lbs	≤2.2 lbs
VSQG*	**≤ 220 lbs**	≤2.2 lbs	

*Note that VSQG definition was adopted in GIR Phase 1 Rulemaking, but DTSC has not adopted conditions for exemption for VSQGs. VSQGs must comply with SQG requirements.

Generator Status Determination

Count hazardous waste only once

- Do not count satellite accumulation of waste again when moved to the central accumulation area. Count satellite accumulation area waste once.

Count all hazardous waste and acute hazardous waste in containers and tanks, except:

- Waste that is exempt from regulation under sections 66261.4(c) through (f), 66261.6(a)(3), or 66261.7(a)
- Universal Waste

How do you document generator status?

Generator Status Determination

- Generator status is determined on a monthly basis and may change from month to month
- California does not currently allow Episodic Generation for temporary status changes
- Key question for SQGs: can you prove your generator status?

Episodic Generation

- Episodic Events:
  - Can be planned or unplanned
  - Does not normally occur during generator operations resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category
- SQGs/VSQGs can maintain generator status for hazardous waste generated during one episodic event is allowed per calendar year
- Provision is being considered by DTSC under Phase 2 GIR Rulemaking

SQG & LQG Requirements

- Hazardous Waste Determinations
- Generator Status Determination
- Container & Tank Standards
- EPA ID Number
- Labeling & Pre-Transport Requirements
- Manifests and LDRs
- Accumulation Area Requirements
- Emergency Preparedness and Prevention
- Recordkeeping

Management Practice Differences

SQG Requirements

- **60- Day** Exception Report
- Renotification Every **Four Years**
- **180-Day** Accumulation Time Limit
- **2,200 lb** Monthly Generation Limit

LQG Requirements

- **45- Day** Exception Report
- Renotification Every **Two Years**
- **90-Day** Accumulation Time Limit
- No Monthly Generation Limit

Recordkeeping Differences

SQG Requirements

Telephone Contact & Emergency Response Equipment List

Basic Training

LQG Requirements

Contingency Plan & Quick Reference Guide

Annual Training, Training Plan, Job Descriptions, and Records

Biennial Reporting (if RCRA LQG)

Potential Scenarios & How to Avoid

- Potential Scenarios for Changing Generator Status
- How to Avoid Changing Generator Status

What is a scenario which would cause a facility to transition from SQG to LQG?

Potential Scenarios

Planned	Unplanned
• Production Increase • Chemical Cleanouts • Maintenance Activities	• Process Upsets • Recalls

Example: Production Increase

A coatings manufacturer plans to increase production by 25% based on marketing forecasts. For every batch produced, the facility generates waste from reactor batch residue and rinsing.

The facility currently produces 50,000 lbs of coatings per month. The facility generates approximately 1,800 lbs of waste per month from reactor batch residue and rinsing.

What would you do to prepare for this situation?

Example: Production Increase

- Calculate the amount of hazardous waste generation expected after the production increase.

  2,250 lbs per month hazardous waste generation

  Facility will transition from SQG to **LQG**

- Evaluate strategies to decrease waste generation if possible.
  - Waste minimization – is it possible to use less rinsate?
  - Waste recycling – solvent reclamation system?
- Determine what additional tasks need to be completed prior to LQG transition (more on this later!)

Example: Annual Maintenance

Every December, a medical device facility cleans their four (4) process lines. This maintenance activity uses a diluted acid cleaning solution which is shipped off as hazardous waste. Each process line generates 1,000 lbs of the cleaning solution waste.

1. Is this facility an LQG?
   The facility is an LQG because during one calendar month, 4,000 lbs of hazardous waste is generated.

2. Is there any way the facility can avoid LQG status?
   Stagger maintenance to be completed in 2 months rather than 1.
   Episodic generation provisions (if adopted)

Example: Process Upset

A pharmaceutical manufacturing facility loses power during production which causes batch failures. The batch failures in total are 5,000 lbs. The facility is typically an SQG of hazardous waste.

What should the facility do to address this waste generation?

Example: Process Upset

Can the facility avoid LQG generator status?

- Revisit waste determinations – the failed batches may not be hazardous waste. Conduct analytical testing or use generator knowledge to determine waste characteristics.
- The facility cannot avoid LQG status by shipping out the failed batches over a few months since status is based on waste generated.

If the facility does become an LQG:

- Review SQG and LQG management and recordkeeping differences and begin implementing immediately
- Conduct the required agency notifications.

What are potential ways you can avoid LQG status?

Waste Management Approaches

Tips to Avoid LQG Status

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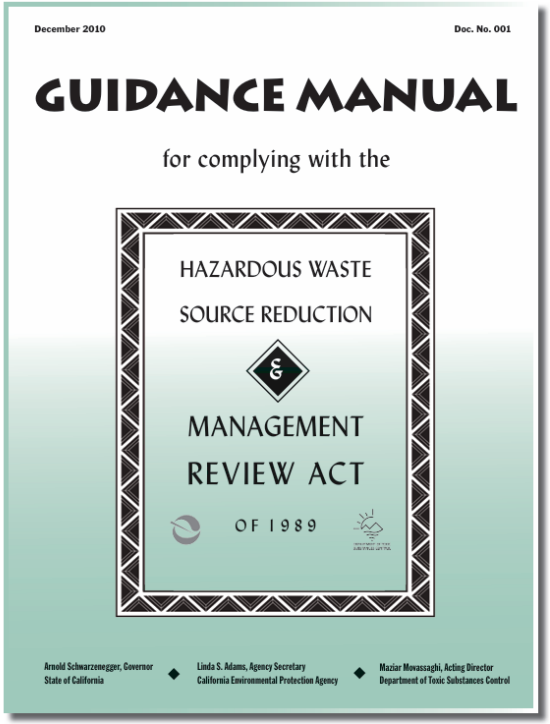
- Quarterly chemical cleanouts
- Space out maintenance activities, if possible
- Waste minimization
- Waste treatment
- Exemptions for waste
- Revisit waste determinations
- Episodic generation (if adopted)

Waste Minimization

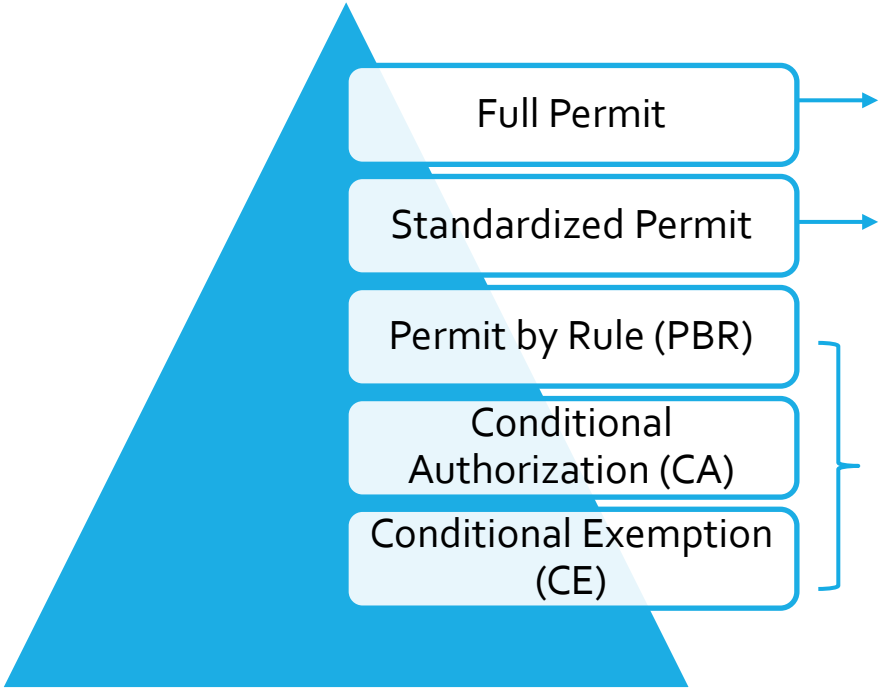
- Required for facilities who generate >12,000 kg of hazardous waste in a reporting year under Senate Bill 14
- Source reduction measures:
  - Input changes
  - Operational improvements
  - Production process changes
  - Product reformulations
  - Administrative steps



Waste Treatment

- Treatment is defined as:
  - Any method, technique, or process which is not otherwise excluded from the definition of treatment and which is designed to **change the physical, chemical, or biological character or composition of any hazardous waste** or any material contained therein, or which removes or reduces its harmful properties or characteristics for any purpose
- Common exemptions:
  - Phase separation of hazardous waste during storage or accumulation in tanks or containers, if the separation is unaided by the addition of heat or chemicals.
  - Evaporation of water from hazardous wastes in tanks or containers, such as breathing and evaporation through vents and floating roofs, without the addition of pressure, chemicals, or heat other than sunlight or ambient room lighting or heating.

California Tiered Permitting

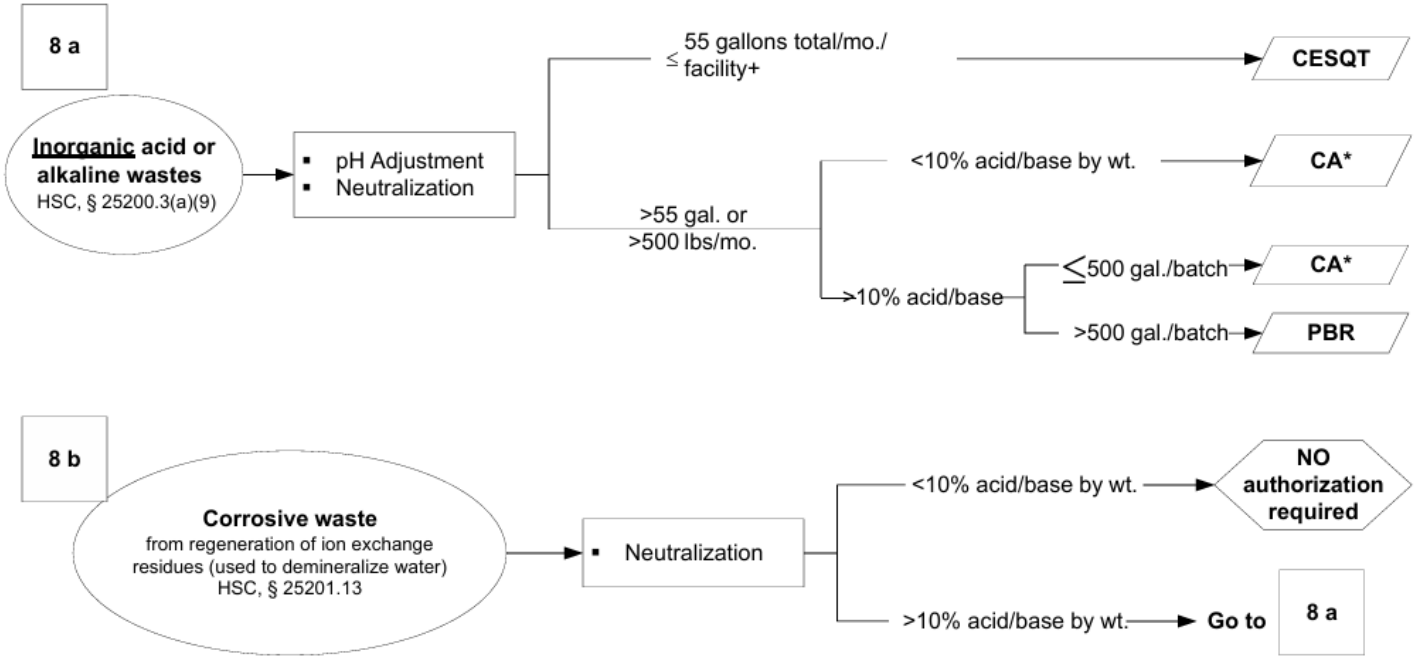


Includes all facilities requiring a RCRA permit, plus selected non-RCRA activities

A facility that manages waste non-RCRA hazardous waste (recyclers, oil transfer stations, and precious metals recyclers)

Onsite treatment authorization for non-RCRA wastes (refer to DTSC Tiered Permitting Chart)

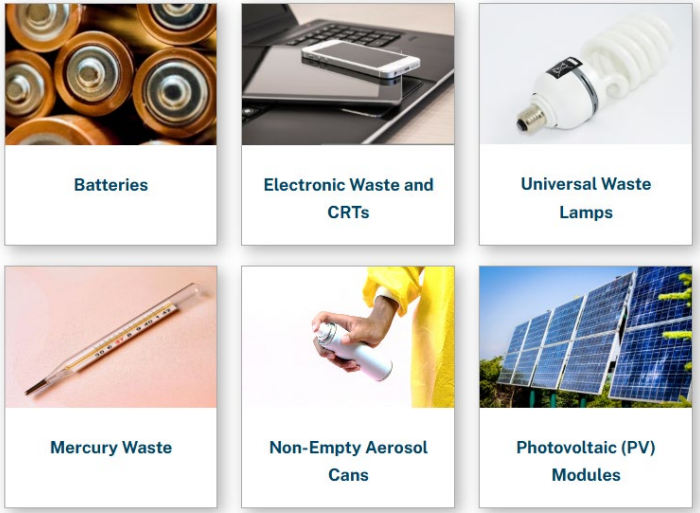
California Tiered Permitting



https://dtsc.ca.gov/wp-content/uploads/sites/31/2022/09/Onsite-Tiered-Permitting-Flowchart.pdf

Waste Exemptions / Exclusions

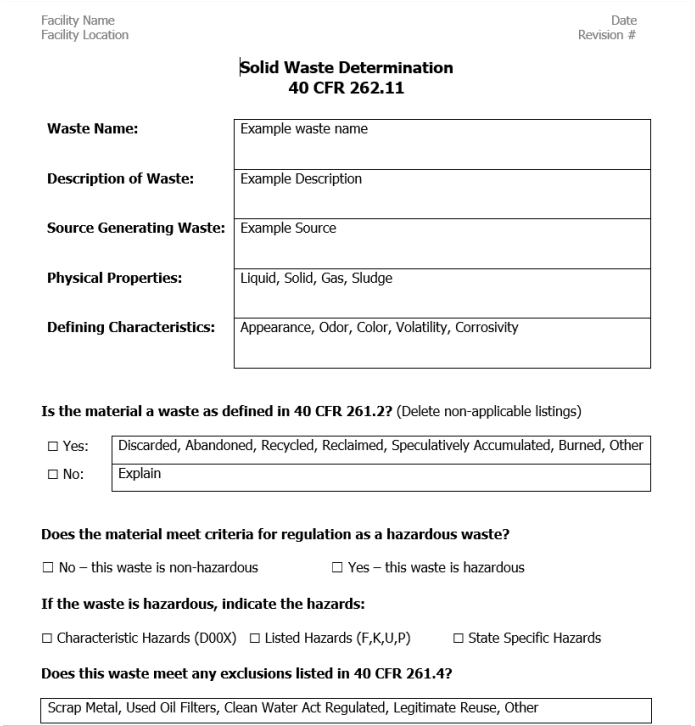
- Universal Waste
- Recyclable Materials
- Excluded Wastes, examples below:
  - Intermediate manufacturing process streams, and coolants, lubricants or cutting fluids that are filtered to extend their useful life
  - Industrial wastewater discharges that are point source discharges subject to the federal Clean Water Act.
  - Secondary materials that are reclaimed and returned to the original process or processes in which they were generated where they are reused in the production process if specific conditions are met.



https://dtsc.ca.gov/universalwaste/

Waste Determinations

- As required by 22 CCR § 66262.11
- Can be based on process knowledge and/or analytical testing
- Common mistakes:
  - Using vendor waste profiles as waste determinations
  - Not updating waste determinations after process changes
  - Incorrect waste codes / waste determinations
  - Only keeping records of **hazardous waste** determinations



Facility Name
Facility Location

Date
Revision #

Solid Waste Determination
40 CFR 262.11

Waste Name:	Example waste name
Description of Waste:	Example Description
Source Generating Waste:	Example Source
Physical Properties:	Liquid, Solid, Gas, Sludge
Defining Characteristics:	Appearance, Odor, Color, Volatility, Corrosivity

Is the material a waste as defined in 40 CFR 261.2? (Delete non-applicable listings)

☐ Yes:	Discarded, Abandoned, Recycled, Reclaimed, Speculatively Accumulated, Burned, Other
☐ No:	Explain

Does the material meet criteria for regulation as a hazardous waste?

☐ No – this waste is non-hazardous ☐ Yes – this waste is hazardous

If the waste is hazardous, indicate the hazards:

☐ Characteristic Hazards (D00X) ☐ Listed Hazards (F,K,U,P) ☐ State Specific Hazards

Does this waste meet any exclusions listed in 40 CFR 261.4?

Scrap Metal, Used Oil Filters, Clean Water Act Regulated, Legitimate Reuse, Other

Waste Determinations

No	Waste Description or Process	Waste Determination – 22 CCR 66262.11						Hazardous Waste?
		Initial Step Waste per 22 CCR 66261.2 (Y/N)	**Step 1** Made at generation point per 22 CCR 66260.10 (Y/N)	**Step 2** Excluded per 22 CCR 66261.4 (Y/N)	**Step 3** Listed in 22 CCR 66261.30-35 (Y/N)	**Step 4** Characteristic per 22 CCR 66261.20-24 (Y/N)	**Step 5** Other Exclusions or Restrictions (Y/N)	
1	Waste lamps	Yes	Yes	No	No	Yes – D008 (lead)[1]	Yes – Exempt per 22 CCR 66261.9	Universal Waste (22 CCR 66261.9)
2	Scrap Metal	Yes	Yes	Yes – Exempt per 22 CCR 66261.6(a)(3)(B)	N/A	N/A	N/A	Recycled as Scrap Metal
3	Oily Water	Yes	Yes	No	No	Yes – acute aquatic toxicity	No	Non-RCRA Hazardous Waste (223)
4	Waste Paint	Yes	Yes	No	No	Yes – D001 (ignitable)	No	RCRA Hazardous Waste (D001) & (343)
5	Waste Acetone	Yes	Yes	No	Yes – F003 (non-halogenated solvents)	Yes - D001 (ignitable)	No	RCRA Hazardous Waste (D001, F003) & (212)
6	Empty Drums Sent Back to Supplier	Yes	Yes	No	N/A	N/A	Yes – Exempt per 22 CCR 66261.7	Empty Container (22 CCR 66261.7)

BREAK TIME!

SQG vs LQG: Key Differences

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Regulators: What is the most common compliance issue you've seen at SQG facilities? At LQG facilities?

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Management Practice Differences

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- **180-Day** Accumulation Time Limit
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LQG Requirements

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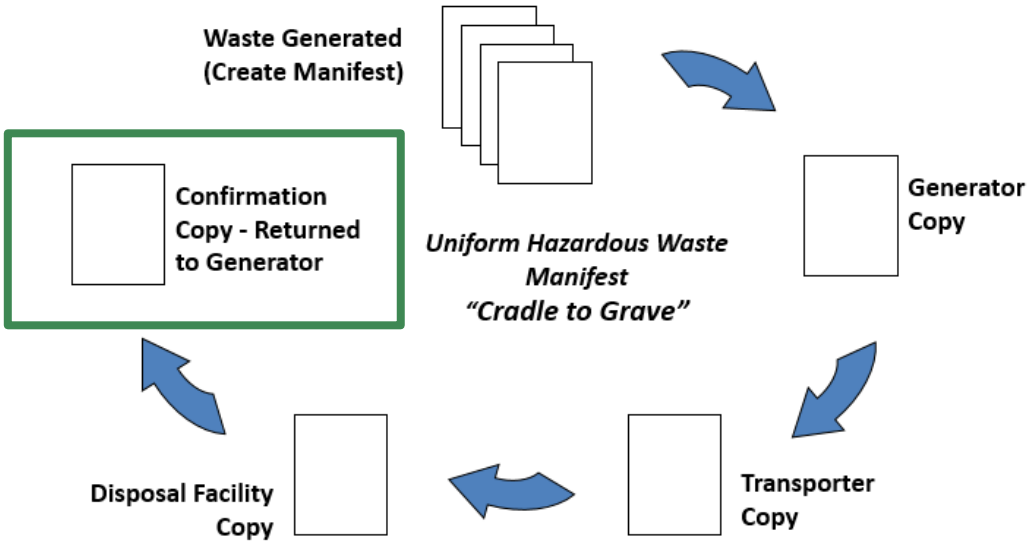
Exception Reporting



- Recipient (TSDF) provides copy of manifest to generator
- If confirmation copy is not received within 35 days, begin investigation.
- Log all efforts to find return manifest
- LQGs file exception report within 45 days
- SQGs file exception report within 60 days

Renotification

RCRA SQG	RCRA LQG
• Must re-notify starting on September 1, 2024, and every four years thereafter using EPA form 8700-12. This re-notification shall be submitted by September 1 of each year in which re-notifications are required.	• Must re-notify by March 1 of each even-numbered year using EPA form 8700-12. A large quantity generator may submit this re-notification as part of its Biennial Report required under section 66262.41.

Accumulation

- Central Accumulation Areas (CAA) - Containers
  - 90 day accumulation time limit for LQG
  - 180 day accumulation time limit for SQG
- Satellite Accumulation Area (SAA)
  - Near Point of Generation
  - 55-gallon limit per SAA
  - Move container to CAA within 3 days of reaching 55-gallon limit
  - Accumulation time limit of 1 year for containers
- SQGs have a 13,200 lb limit of on-site accumulation

The commenter opposes the elimination of the SAA requirements in proposed section 66262.15(a)(6)(D) that were previously proposed to be relocated from existing subsection 66262.34(e)(2). The requirements contain provisions for managing multiple incompatible waste streams in satellite accumulation areas.

DTSC Response:

DTSC has reviewed the comment and determined that no regulatory amendments are necessary. The SAA allowance provision in proposed section 66262.15(a)(6)(D) was removed from the proposed regulations because DTSC determined that the existing California SAA allowance is less stringent than the federal hazardous waste program. The federal program allows a total of 55-gallons or one-quart of hazardous waste to be accumulated in the SAA, not 55-gallons or one-quart for each group of compatible wastestreams. This federal interpretation may be found in Federal Register 85732, Vol. 81, No. 228, November 28, 2016. The elimination of section 66262.15(a)(6)(D) is necessary for DTSC to maintain California's hazardous waste program equivalency with the federal hazardous waste program and its RCRA authorization to implement California's program in lieu of the federal program. The proposed regulations allow generators to accumulate different wastestreams in SAA up to the maximum allowed limit, 55-gallons of non-acute hazardous waste or one-kilogram/one-quart of acute hazardous waste or extremely hazardous waste. The proposed regulations do not prevent a generator from using multiple containers for incompatible hazardous wastes at an SAA.

Ignitable/Reactive Wastes

- For LQGs:
  - Containers holding ignitable / reactive wastes should be at least 15 m (50 ft) from the facility's property line.
  - Proper precautions should be taken while stored and handled.
  - Hazard area should be labeled with "No Smoking" signs.

Closure Requirements

22 CCR 66262.17(a)(8)

- When closing a waste accumulation unit, LQGs must place a notice in operating record within 30 days of closure identifying location of unit or meet "clean close" standards for the unit and notify DTSC within 90 days using EPA Form 8700-12.
- When closing a **RCRA LQG facility,** the LQG must notify DTSC using EPA Form 8700-12 at least 30 days *prior to* closing their facility **and w**ithin 90 days *after* closing the facility
- Other provisions for if a LQG cannot clean close within 90 days

Tank Requirements for SQGs

40 CFR 262.16(b)(3) / 22 CCR §66262.34

- **Compatible** with wastes, reagents, etc.
- **Label** tanks "Hazardous Waste", indication of hazards, and accumulation period
- Demonstrate tanks are emptied every 180 days and **maintain logs**
- **Daily** (operating day) inspections, records, measurements: waste feed cut-off/by-pass system, monitoring equipment, freeboard, tank levels, pressure, temperature, tank level (option for weekly if tank equipped with full secondary containment + leak detection)
- **Weekly** inspections: condition (corrosion, leaking), evidence of leaks
- **Waste feed cut-off** for continuous-feed system
- **2' of freeboard** for uncovered tanks unless the tank has secondary containment volume equivalent to 2' freeboard

Tank Requirements for LQGs

40 CFR 262.17(a)(2) – 40 CFR 265 Subpart J / 22 CCR §66262.34 & § 66265.191-196

Label tanks "Hazardous Waste", indication of hazards, and accumulation period

Logs to demonstrate accumulation/turnover every 90 days

Daily inspections

P.E. certified assessment and tank tightness testing

Corrosion protection

Secondary containment (liner, vault, double-wall tank, or equivalent) & leak detection

Spill/overfill prevention

Tank release response (tank draining, clean up waste in containment, report to DTSC)

Air emission standards (Pre-1986 tanks without secondary containment – P.E. certified written assessment

Air Emission Standards

22 CCR Div. 45, Ch. 15, Articles 27-28.5

- Article 27 – Process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, and air or steam stripping that manage hazardous wastes with organic concentrations of at least 10 ppm(w)
- Article 28 – Leak Detection and Repair (LDAR) for equipment that contains or contacts hazardous wastes with organic concentrations of at least 10% by weight
- Article 28.5 – Standards for containers, tanks, or surface impoundments (500 ppm(w) volatile organic content)
  - Containers – Level 1 (<119 gals or not in not material service), Level 2, or Level 3 (waste stabilization)
  - Tanks – Level 1 (fixed roof) or Level 2 (other tank options)

Recordkeeping Differences

SQG Requirements

Telephone Contact & Emergency Response Equipment List

Basic Training

LQG Requirements

Contingency Plan & Quick Reference Guide

Annual Training, Training Plan, Job Descriptions, and Records

Biennial Reporting (if RCRA LQG)

Emergency Response

- SQGs are required to have emergency information posted by phones or areas with HW
  - Name and number of emergency coordinator.
  - Locations of fire and spill control equipment.
  - Phone number of Fire Department.
- LQGs must maintain a contingency plan and quick reference guide (QRG)

Contingency Plan

- Written contingency plan for the facility that contains:
  - Description of actions to be taken by facility personnel in response to fires and/or explosions and unplanned sudden or non-sudden release of hazardous waste to air, soil, or surface water
  - Description of arrangements agreed to by local police and fire departments, hospitals, contractors and State and local emergency response teams
  - List of names, addresses, phone numbers (office and home) of all persons qualified to act as emergency coordinator
  - List of all emergency equipment (and capabilities) at the facility
  - Evacuation Plan

Quick Reference Guide

- Types/names of hazardous waste and associated hazards
- Estimated maximum amounts of hazardous wastes
- Hazardous wastes requiring unique/special treatment
- Map showing where hazardous wastes are generated, accumulated or treated at the facility
- Map of facility and surroundings to identify routes of access and evacuation
- Location of water supply
- Identification of on-site notification systems
- Name of emergency coordinator(s) or listed staffed position(s) and 7/24-hour emergency telephone number(s)

Quick Reference Guide

Trinity Consultants

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Department of Toxic Substances Control

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Gavin Newsom
Governor

This quick reference guide template was created by DTSC to be used as a guide to assist the regulated community with compliance. It does not substitute for or replace any regulatory requirements.
An updated contingency plan and quick reference guide is required to be resubmitted when amended.
Please note that treatment, storage, and disposal facilities (TSDF) and interim status facilities are not subject to quick reference guide requirements.

Contingency Plan Quick Reference Guide
Facility Name

Street Address

City, State, Zip

Facility Contacts (First Name, Last Name, 24/7 Emergency Number):

Primary Emergency Coordinator and phone number:

Secondary Emergency Coordinator and phone number:

Tertiary Emergency Coordinator and phone number:

Hazardous Waste Information:

Name of Waste (in layman's terms)[1]	Waste Codes/Hazards[2]	Location Accumulated[3]	Map Symbol[4]	Maximum Amounts Present[5]	Response Notes[6]	Special Notes to Hospital/Treatment Personnel[7]

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Training Requirements

SQGs

- All employees are to be thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

LQGs

- Ensure that facility personnel successfully complete a training program that teaches facility personnel to perform their duties in a way that ensures the facility's compliance.
- Job descriptions, training records, initial and refresher training

Training Requirements

Content

- All employees must be familiar with the contingency plan and evacuation procedures
- For personnel handling waste, the type and degree of required training depends on employees' responsibilities
- Training must cover HW management procedures and emergency response

Frequency

- Initial training must be completed within 6 months of the date of employment and reviewed annually.
- General awareness training and function-specific job training shall be completed every 24 months.

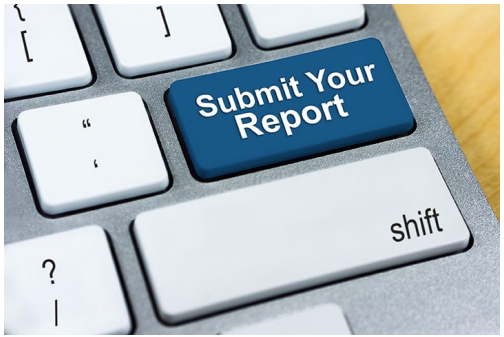
Recordkeeping

- Maintain job title and personnel for each position and written job description
- Maintain written description of introductory and continuing training program
- Maintain certified records that document the training.

Biennial Reporting

22 CCR Div. 45, Ch. 15, Articles 27-28.5

- Report: Every 2 years (report in even-numbered years for odd-numbered years)
- Due: March 1 of even-numbered year
- **RCRA LQGs** report all hazardous waste generated in a calendar year, even when it is managed the next calendar year
- Report hazardous wastes generated throughout calendar year, even for months when they do not generate at LQG-rates
- Recycling facilities must report wastes that are not stored prior to recycling



How long are hazardous waste records required to be kept at a facility?

Best Practices

Regulators/Industry: any best practices to share for managing hazardous waste compliance?

Best Practices

For SQGs

- Document monthly hazardous waste generation to prove SQG status

For LQGs

- Conduct review of emergency response requirements, training, reporting, and management requirements
- LQGs are at a higher risk for regulatory inspections!

For those in the middle

- Review waste determinations, waste minimization/treatment, & other management practices to avoid LQG Status
- Prepare LQG transition plan if the facility plans to or may transition to LQG

Generator Status Documentation

- Remember, generator status is determined by waste **generated** in a calendar month, not accumulated or transported
  - Manifests are NOT a reliable source for generator status documentation
  - Don't forget to count waste in SAAs
- Best Practice: create a robust waste tracking method & waste inventory

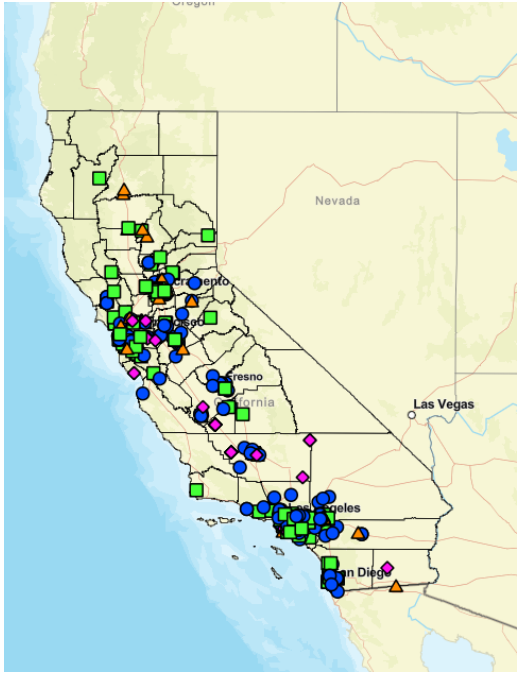
Monthly Hazardous Waste Generation and Accumulation Tracking

Year: _____

Table 1 - Monthly Hazardous Waste Generation (Central Accumulation and Satellite Accumulation)													
		Amount of Hazardous Waste Generated on a Monthly Basis (pounds)											
Waste Stream	Acute (Y/ N)	January	February	March	April	May	June	July	August	September	October	November	December
Monthly Total:													

Inspection Tips

- Inspections can be done by your CUPA and/or DTSC
- Ensure documentation for hazardous waste compliance is readily available
- Common findings:
  - Missing or inadequate training records
  - Labelling
  - Container closure
  - Manifest errors
  - Exceeding accumulation time limits
  - Tank requirements



Waste Determinations

- Maintain documentation & supporting data for all wastes onsite
  - Update waste determinations when SDS or processes change
  - Check all waste profiles completed by your waste vendor
    - Look out for inaccurate waste codes!
    - Conduct sampling for waste streams to confirm hazardous waste characteristics & fish bioassay
  - Re-sample waste streams on a regular basis to ensure waste determination accuracy

Waste Description	Approximate Quantity	Solid waste (40 CFR 261.2)?	Excluded Waste (40 CFR 261.4)?	Listed Waste (Subpart D)?	Characteristic Waste (Subpart C)?	Other exclusions or restriction?	Comments
Wastewater Effluent	4,000,000 gals/year	Yes	No	No	No	No	Treated effluent is non-hazardous
Filter Press Solids	4,000 lbs/year	Yes	No	No	Yes	No	EPA No. D006, D007
Waste Paint	7,500 lbs/year	Yes	No	No	Yes	No	EPA No. D007
Waste Solvent	30,000 lbs/year	Yes	No	No	Yes	No	EPA No. D001
Spray Booth Filters	4,000 lbs/year	Yes	No	No	No	No	Non-hazardous waste per lab data
Used Oil	3,000 gals/year	Yes	No	No	No	Yes	Recycled used oil per 40 CFR 279
Empty Aerosol Cans	1,000 lbs/year	Yes	Yes	No	No	Yes	Managed as excluded scrap metal
Scrap Metal	5,000 lbs/year	Yes	Yes	N/A	N/A	N/A	Managed as excluded scrap metal

LQG Transition Plan

- Review SQG vs. LQG requirements and identify gaps
- Prepare employee training program & training plan
- Prepare contingency plan & QRG
- Update internal documents (SOPs, compliance calendars, etc.) to reflect updated requirements
- Notify your CUPA of generator status changes
- Conduct site audit to ensure LQG requirements are being implemented

HW Generator Summary Chart

Requirement	SQG	LQG
Hazardous Waste Determination	The generator shall make a HW determination: • Determine if the material is a waste. • Determine if the waste is excluded from being regulated as a hazardous waste. • Determine if the waste is a listed hazardous waste. • Determine if the waste exhibits a hazardous waste characteristic. *22 CCR §66262.11*	The generator shall make a HW determination: • Determine if the material is a waste. • Determine if the waste is excluded from being regulated as a hazardous waste. • Determine if the waste is a listed hazardous waste. • Determine if the waste exhibits a hazardous waste characteristic. *22 CCR §66262.11*
Monthly Generator Category Determination	< 1,000 kg/month of non-acute HW and ≤ 1 kg of acutely/extremely HW. *See table in 22 CCR §66262.13*	≥ 1,000 kg/month of non-acute HW or > 1 kg of acutely/extremely HW. *See table in 22 CCR §66262.13*
Notification and Identification Number		
EPA ID Number	Required to treat, store, dispose of, transport or offer for transportation. *22 CCR §66262.18*	Required to treat, store, dispose of, transport or offer for transportation. *22 CCR §66262.18*
Renotification	Generators of RCRA HW shall renotify DTSC using EPA form 8700-12 by September 1, 2024 and every 4 years thereafter. *22 CCR §66262.18(d)(1)*	Generators of RCRA HW shall renotify DTSC using EPA form 8700-12 by March 1st of each even numbered year. *22 CCR §66262.18(d)(2)*

https://dtsc.ca.gov/hazardous-waste-generator-summary-chart/

Any Questions?

Find us at Booth #48!

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