



DEPARTMENT OF  
**ECOLOGY**  
State of Washington



## Counting Dangerous Waste

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Under the Dangerous Waste  
Regulations



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<sup>1</sup> <https://ecology.wa.gov/accessibility>

# **Counting Dangerous Waste**

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## **Under the Dangerous Waste Regulations**

Hazardous Waste and Toxics Reduction Program

Washington State Department of Ecology

Olympia, Washington

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# Introduction

This guide will help you understand when and how to count dangerous waste as described in the Dangerous Waste Regulations, [Chapter 173-303 WAC](#).<sup>2</sup> **Counting** means calculating the total weight of dangerous waste generated during a calendar month.

This guide is not intended to replace state or federal regulations, explain how to designate waste, or cover every possible situation. It includes information about:

- Quantity exclusion limits
- Storage and accumulation
- Recycling and excluded wastes
- Multiple counting exemption
- Treatment by generator
- Permit by rule
- Domestic sewage exclusion
- Counting and annual reporting

## Why count dangerous waste?

By counting your dangerous waste, you are able to:

- Determine if your business is a small, medium, or large quantity generator.
- Understand what you need to include in the Dangerous Waste Annual Report.
- Determine if you need to submit a [Pollution Prevention Plan](#).<sup>3</sup>

## How often should you count?

You must count your dangerous waste each calendar month. Changes in the amount of your dangerous waste can affect your [generator category](#).<sup>4</sup>

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<sup>2</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303>

<sup>3</sup> <http://www.ecology.wa.gov/p2plan>

<sup>4</sup> <https://ecology.wa.gov/GeneratorCategory>

# Quantity Exclusion Limits

Quantity exclusion limits (QELs) determine your generator category by defining how much of each type of waste, by weight, you generate **per month**. QELs differ based on the designation, or waste codes, assigned to your waste.

You may generate more than one kind of dangerous waste (DW). If this happens, use the combined quantity of wastes when determining your generator category. Waste quantities must be combined for all waste with common QELs.

Most dangerous wastes have a QEL of 220 pounds. But some wastes are considered more dangerous and have a QEL of only 2.2 pounds, such as acutely hazardous waste (P-listed) and extremely hazardous waste (WT01).

**Table 1: How much of each type of dangerous waste a generator can create each month.**

<b>Generator category</b>	<b>Amount of DW with a monthly QEL of 2.2 pounds</b>	<b>Amount of DW with a monthly QEL of 220 pounds</b>	<b>Amount of DW cleanup residue with a monthly QEL of 2.2 pounds<sup>5</sup></b>
<b>Large quantity generator</b>	Greater than 2.2 pounds	Any amount	Any amount
<b>Large quantity generator</b>	Any amount	Greater than or equal to 2,200 pounds	Any amount
<b>Large quantity generator</b>	Any amount	Any amount	Greater than 220 pounds
<b>Medium quantity generator</b>	Less than or equal to 2.2 pounds	Greater than 220 pounds and less than 2,200 pounds	Less than or equal to 220 pounds
<b>Small quantity generator</b>	Less than or equal to 2.2 pounds	Less than or equal to 220 pounds	Less than or equal to 220 pounds

For more information about determining your generator category, see [WAC 173-303-169](#).<sup>6</sup>

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<sup>5</sup> This column refers to any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste or WT01 extremely hazardous waste.

<sup>6</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-169>

# Storage and Accumulation

**Storage** means holding dangerous waste for a temporary period. **Accumulation** of dangerous waste is considered a form of storage. You're exempt from dangerous waste storage permit requirements as long as you meet the conditions for exemption in WAC 173-303-170(2)(b).

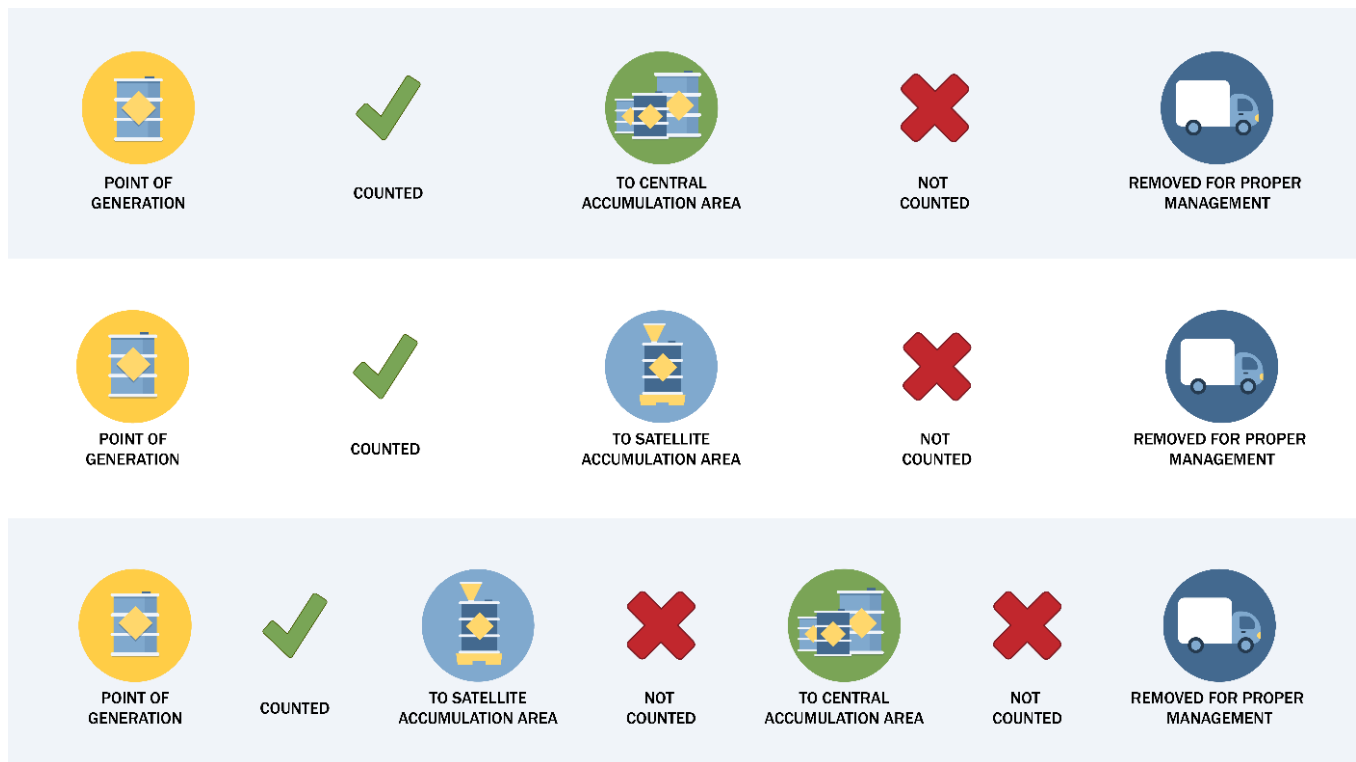
## When to count accumulated dangerous waste

As Figure 1 below shows, dangerous waste is counted when it's generated, **before** accumulation in your central accumulation area (CAA) or satellite accumulation area (SAA).

When the waste is removed from your CAA or SAA, it doesn't need to be counted again.

Dangerous waste accumulated under the SAA provisions is also counted on a monthly basis (see WAC 173-303-174). For more guidance on satellite accumulation refer to our [Focus on: Satellite Accumulation Areas](#)<sup>7</sup> publication.

**Figure 1: Dangerous waste counted under the accumulation regulations.**



<sup>7</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1904029.html>

# Recycling and Excluded Wastes

Dangerous wastes that are stored, disposed, treated, recycled, or manifested are normally counted. However, in some circumstances dangerous wastes don't need to be counted. See the flow chart, [Counting Dangerous Waste Involved in Recycling](#),<sup>8</sup> for a visual guide.

## General definitions

**Recycle:** to use, reuse, or reclaim a material.

**Use or reuse:** to employ a material as an ingredient in an industrial process, or to use it as a substitute for a commercial product, without first being reclaimed.

## When wastes are not counted

Wastes **aren't** counted when they are:

- **Recycled following a specific type of management**

Certain wastes aren't counted toward your generator category when they're recycled following specific types of management. Examples are used oil, spent chlorofluorocarbon (CFC) and hydro-chlorofluorocarbon (HCFC refrigerants), spent lead acid batteries, used batteries, scrap metal, spent antifreeze, waste recycled without prior storage or accumulation (see [Recycling Without Prior Accumulation of Storage section](#)), and waste recycled under the multiple counting exemption (see [Multiple Counting Exemption section](#)). See WAC 173-303-169(4 & 5).

- **Conditionally exempt**

Some dangerous wastes are exempt when managed under WAC 173-303-017(2). They aren't counted and are exempt from reporting.

- **Conditionally excluded by a type of waste management**

Some dangerous wastes are conditionally excluded from the dangerous waste regulations and don't need to be counted. Specific terms must be met.

Conditionally excluded materials are not dangerous waste, are regulated under other state and federal programs, or are recycled in ways that don't threaten public health or the environment. Examples include treated wood waste, polychlorinated biphenyls (PCBs) managed under the Toxic Substances Control Act (TSCA), waste generated in a

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<sup>8</sup> Refer to Flow Chart: Counting Dangerous Waste Involved in Recycling section



product or raw material storage tank until removed, and waste reclaimed and reused in a closed loop system (see WAC 173-303-071).

- **Special waste**

Special Waste is state-only dangerous waste that's conditionally excluded by WAC 173-303-073. A waste must be fully designated before it can be identified as Special Waste. Special Wastes are defined in WAC 173-303-040.

If you generate special waste, you can either manage it as fully regulated dangerous waste or follow the conditional exclusions of WAC 173-303-073. Special waste isn't counted when determining generator category, but does need to be reported and counted towards Pollution Prevention Planning and fees. For more information see our [Focus on Managing Special Waste](#)<sup>9</sup> publication.

- **Episodic dangerous waste**

If you are a small or medium quantity generator, you can manage qualifying episodic dangerous waste under alternative standards (WAC 173-303-173) without counting it towards your monthly generator category. Episodic events include activities that don't normally occur during your operations, and result in a large amount of waste that exceeds your usual generator category.

Although your generator category remains the same, episodic waste still counts towards your Hazardous Waste Planning Fee and Pollution Prevention Planning.

For more information, see our publication [Focus on: Episodic Generation](#).<sup>10</sup>

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<sup>9</sup> <https://apps.ecology.wa.gov/publications/summarypages/961254hwtr.html>

<sup>10</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1904019.html>

# Recycling Without Prior Accumulation or Storage

**Without prior storage or accumulation** means that as soon as the waste is generated, it immediately enters the recycling unit and is not counted.

Under this counting exclusion, recycling must come **before** accumulation or storage. For more detail, see WAC 173-303-169(4)(d).

## When to count dangerous waste under recycling provisions

As Figure 2 below shows, if your dangerous waste immediately enters your on-site recycling unit, it doesn't need to be counted. However, you must count dangerous waste residues generated from the recycling activity.

Dangerous waste stored or accumulated prior to recycling is counted before it enters the central accumulation area or satellite accumulation area. It isn't counted when it's moved from these accumulation areas to your on-site recycling unit. Refer to the [Multiple Counting Exemption section](#) for information about this exemption.

**Figure 2: Dangerous waste residues generated from recycling activity.**



## Multiple Counting Exemption

If you store or accumulate spent solvents on site before they are recycled, you must count them as dangerous waste. There are three reasons for counting these wastes:

- To determine whether you are a small, medium, or large quantity generator for that particular month.
- To report the combined monthly total on your Dangerous Waste Annual Report (see the [Counting and Annual Reporting Requirements section](#)).
- To help with [Pollution Prevention](#)<sup>11</sup> planning.

Using the multiple counting exemption<sup>12</sup> may benefit your site because it removes the need to count spent solvents twice when generated in the same month. Frequent recycling increases the benefit from this exemption.

Facilities that reclaim and reuse solvents multiple times during the month:

- May lower their generator category and have fewer regulatory requirements.
- May reduce their [Hazardous Waste Planning](#)<sup>13</sup> fees.

Spent materials generated, reclaimed, and reused on site are counted only once per month. Therefore, you **don't** need to count every single batch of spent solvent that is distilled during the month.

### When are spent solvents counted?

You shouldn't count spent solvents when there is no accumulation or storage. For example, if a still is hard-piped directly to a production process and the reclaimed solvent is returned to that process, also by hard pipe, there has been no accumulation or storage so spent solvents are not counted.

You must count spent solvents when there is storage or accumulation. Record the accumulated amount on a [Monthly Recycling Log](#)<sup>14</sup> until you are ready to operate the still.

**Note:** Small quantity generators are typically not required to report their counted spent solvents; however, we recommend all small quantity generators keep a log so they can accurately demonstrate their generator category.

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<sup>11</sup> <https://ecology.wa.gov/P2Plan>

<sup>12</sup> See WAC 173-303-169(5)(b).

<sup>13</sup> <https://ecology.wa.gov/PlanningFee>

<sup>14</sup> See the Monthly Recycling Log Example below.

You must record all spent solvents accumulated before recycling on a monthly recycling log; this includes solvents in satellite accumulation containers intended for on-site recycling. At the end of the month, count the largest amount accumulated at any one time during the month, towards your generator category. Spent solvents accumulated and **not** recycled by the end of the month must be carried over into the next month.

In the new month, add the solvent that **wasn't** recycled to any recently generated spent solvents. The combined amount may be the largest amount accumulated in the second month. To avoid this larger count in the second month, you may choose to recycle all waste before the end of the month. End-of-month recycling will eliminate accumulated solvent carry-over into the following month. Most generators find it is easier to recycle often and avoid counting these larger volumes.

You must count any spilled or mishandled waste towards your generator category. You must also count any dangerous waste residues (such as still bottoms) produced from the recycling process.

## Monthly recycling log

To determine the largest amount of spent solvent accumulated each month, you need to record the:

- Distillation start date.
- Total amount (in pounds) of spent solvent accumulated on site prior to recycling.
- Amount (in pounds) of still bottoms generated.

Count the total amount of still bottoms and the largest amount of spent solvent accumulated towards your generator category for the month. Because recycling is a treatment activity, you are required to maintain a log.<sup>15</sup>

## Don't count lost solvent

During production and cleaning processes, solvents may be “lost” by evaporation. These solvents **shouldn't** be counted. Replenishing the lost solvent with virgin solvent **shouldn't** be counted either.

## Minimize evaporative loss

Maintain your distillation unit to minimize solvent loss through evaporation. Air emissions can contain toxic organic compounds as well as ozone pollutants. Perform preventative maintenance on your equipment to maximize performance and reduce environmental risk:

- Replace seals and gaskets when needed.

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<sup>15</sup> Log requirements: WAC 173-303-170(2)(b)(iv)(B), <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-170>.

- Conduct a tightness analysis.
- Repair leaks.
- Regularly clean the still.

Large quantity generators must also meet [RCRA Organic Air Emissions Standards](#)<sup>16</sup> depending on the type of waste and unit.

## Filing your dangerous waste annual report

Medium and large quantity generators must report the largest amount of spent solvent accumulated during each month on their Generation and Management (GM) form.

If your recycling activities generate a new waste stream, it must be counted and reported on a separate GM form. For example, if you distill a spent solvent mixture and then remove still bottoms, report the spent solvent waste stream on one GM form and the still bottoms waste stream on another GM form.

See our [dangerous waste annual report webpage](#)<sup>17</sup> for more information.

## Example 1

The examples below **don't** cover every situation or counting method in relation to the multiple counting exemption. They are intended as a guide, but if you have specific questions, please contact your [regional Ecology office](#).<sup>18</sup>

A fiberglass shop recycles spent acetone from cleaning processes on site. Spent solvent is accumulated in 55-gallon drums and distilled three times during the month.

- On January 10, the shop starts distilling 160 pounds of collected spent solvent (counting from January 1). It may or may **not** distill all 160 pounds in a single still run, depending on the capacity of the still.
- Meanwhile, the shop generates more spent solvent. It accumulates 150 pounds and starts distilling it on January 17.
- Again, the shop generates 180 more pounds of solvent and begins distilling it on January 28.

The quantity of spent solvent (**not** including still bottoms) reported for the month should be 180 pounds. This is the largest amount of spent solvent accumulated prior to on-site recycling.

<sup>16</sup> <https://www.epa.gov/hwpermitting/resource-conservation-and-recovery-act-organic-air-emission-standards-treatment-storage>

<sup>17</sup> <https://ecology.wa.gov/DWReport>

<sup>18</sup> <https://ecology.wa.gov/contact.html>

Maintain a monthly recycling log like the following example to help you determine the monthly reportable quantity of spent solvent.

**Table 2: Monthly recycling log example**

<b>Distillation Start Date</b>	<b>Pounds collected before recycling</b>	<b>Pounds of still bottoms generated</b>
January 10	160	20
January 17	150	10
January 28	180	30

How to calculate solvent waste for January:

Add the largest number in column two (the pounds collected before recycling) to the total of column three (the pounds of still bottoms generated).

Pounds collected before recycling: 180.

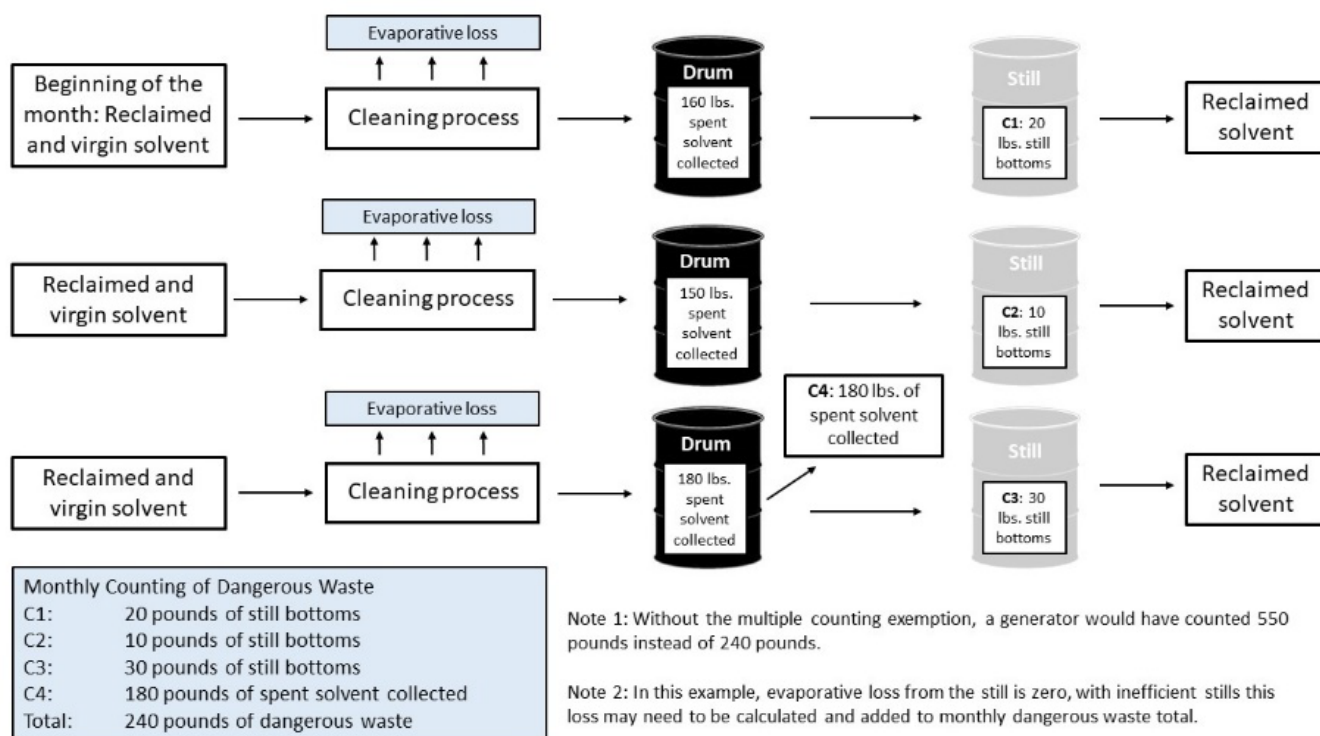
Pounds of still bottoms generated: 60.

180 plus 60 equals 240 pounds of solvent waste counted.

Without the multiple counting exemption, this generator would have counted 550 pounds instead of 240 pounds. In this example, evaporative loss from the still is zero. With inefficient stills this loss may need to be calculated and added to monthly dangerous waste total.

The flow diagram below summarizes Example 1, as explained above.

## Flow diagram: example of multiple counting exemption for one month's activity.



## Example 2

A small shop paints steel objects. It uses one five-gallon container to collect all spent cleaning solvent. When the container is full, the spent solvent is transferred into a five-gallon still for recycling.

The shop repeats this recycling process ten times during the month. It should report five gallons of spent solvent **converted to pounds** for the month, plus the total still bottoms from all ten still runs.

## Example 3

A large auto body paint shop has three different painters. Each generates five gallons of spent solvent from paint mixing and clean-up. When each individual container is full, the shop combines them in a drum for a total of 15 gallons. The 15 gallons is then distilled on March 15, one batch at a time, in a still with a five-gallon capacity. The generator should count 15 gallons in column two of the monthly recycling log, not just the five gallon capacity of the still per batch.

The auto body paint shop continues to generate and accumulate 20 gallons of additional spent solvent for the rest of the month and a total of 8 pounds of still bottoms. The still bottoms should be counted in column three. The shop should count a total of 20 gallons of spent solvent

for the month, whether it was recycled or not. If this additional amount was not recycled by March 31, it should be counted again prior to the next recycling event.

**Table 3: Monthly recycling log example**

<b>Distillation Start Date</b>	<b>Gallons* collected prior to recycling</b>	<b>Pounds of still bottoms generated</b>
March 15	15	3
March 31	20	5

*\*For simplicity, numbers are in gallons. Remember to convert to pounds for reporting purposes.*

How to calculate the solvent waste for March:

Largest number in column two: 20 gallons (130.8 pounds).

Total of column three: 8.

130.8 plus 8 equals 138.8 pounds of solvent waste counted.



# Treatment by Generator

The treatment by generator (TBG) provisions allow you to treat your own dangerous waste on site without a dangerous waste treatment, storage, and disposal (TSD) treatment permit. For guidance, see our [Focus On: Treatment by Generator](https://apps.ecology.wa.gov/publications/SummaryPages/2004017.html)<sup>19</sup> publication and WAC 173-303-170(2)(b). See the flow chart, [Counting Dangerous Waste Involved in Treatment](#),<sup>20</sup> for a visual guide.

## When to count dangerous waste counted under the TBG allowance

As Figure 3 explains, you must count your dangerous waste before treatment in the TBG unit. This waste counts towards your generator's category. Keep a written log of all dangerous waste treated on site, including the treatment date and amount of each waste treated.

If your dangerous waste enters a central accumulation area before it's moved to a TBG unit, count it prior to accumulation. You don't need to count it again when you move it from the central accumulation area into the TBG unit.

Following treatment:

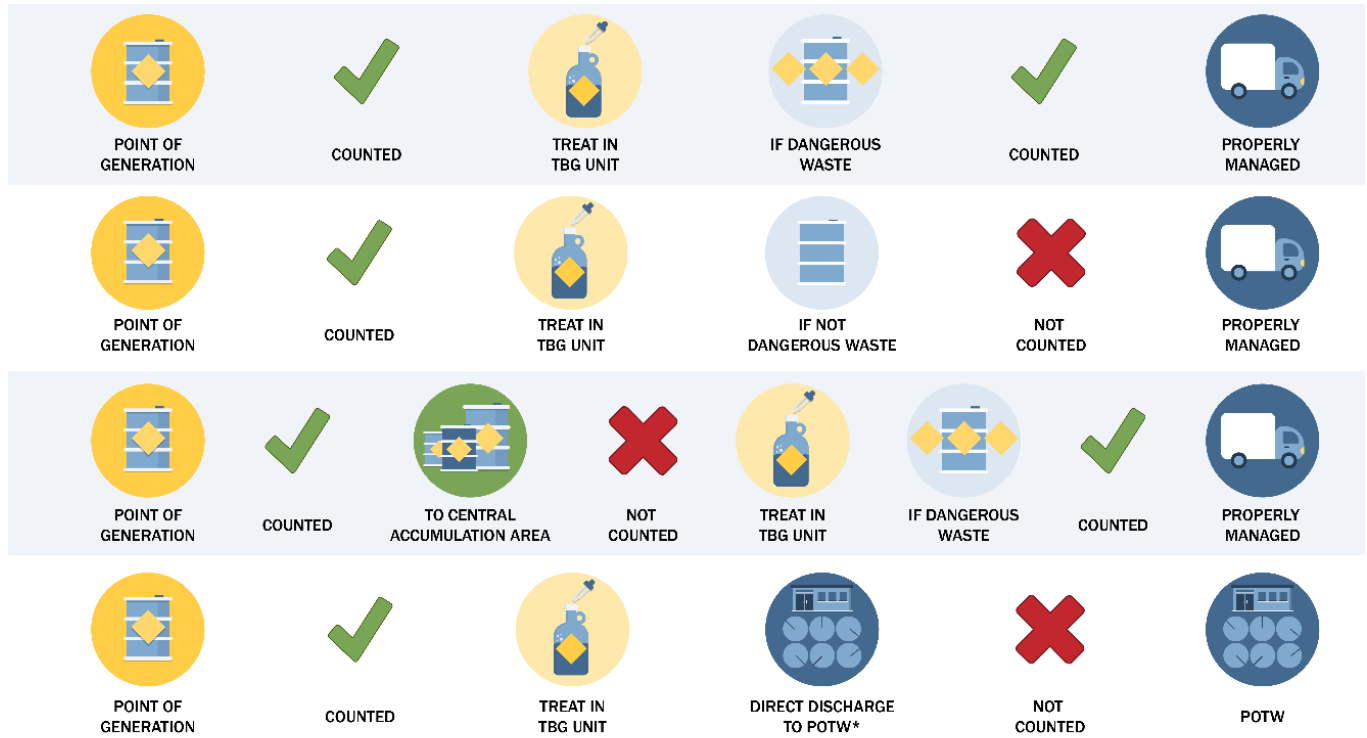
- Count all dangerous waste remaining after the treatment process.
- If the remaining waste is not dangerous or is directly discharged to POTW, you don't need to count it.

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<sup>19</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/2004017.html>

<sup>20</sup> See Flow Chart: Counting Dangerous Waste Involved in Treatment section

**Figure 3: Dangerous waste counted under TBG.**



\*The domestic sewage exclusion applies when the waste enters the sanitary sewage system.

## Counting and Permit by Rule

The permit by rule (PBR) provisions allow on-site treatment of dangerous waste without a written dangerous waste TSD treatment permit, under certain conditions. For PBR provisions to apply, you must only treat your waste in a wastewater treatment unit, elementary neutralization unit, or totally enclosed treatment facility as defined in WAC 173-303-040. For additional guidance, see our publication about [treating waste under permit by rule](https://apps.ecology.wa.gov/publications/summarypages/2104014.html)<sup>21</sup> and WAC 173-303-802(5).

### When dangerous waste is counted under PBR

As Figure 4 shows, wastes you manage immediately upon generation in an on-site PBR unit aren't counted. The key term in this provision is **immediately**. As soon as the waste is generated, it must directly enter a PBR unit. There cannot be temporary storage, accumulation, or any other type of management of waste between the point of generation and the PBR unit.

If the waste is stored in a central accumulation area before it's managed in a PBR unit, it must be counted prior to accumulation. When it's moved to a PBR unit, it's not counted again.

























Dangerous wastes removed from the PBR unit, such as sludge removed for land disposal, are no longer covered by the PBR provisions and must be counted.

Dangerous waste discharged within the PBR provisions and within the unit's National Pollution Discharge Elimination System (NPDES) discharge permit aren't counted.

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<sup>21</sup> <https://apps.ecology.wa.gov/publications/summarypages/2104014.html>

**Figure 4: Dangerous waste counted under PBR.**

						
POINT OF GENERATION	NOT COUNTED	IMMEDIATELY MANAGED IN A PBR UNIT	NOT COUNTED	DANGEROUS WASTE DISPOSED IN COMPLIANCE WITH PBR PROVISIONS		
						
POINT OF GENERATION	NOT COUNTED	IMMEDIATELY MANAGED IN A PBR UNIT	COUNTED	DANGEROUS WASTE DISPOSED OUTSIDE OF THE PBR PROVISIONS		
						
POINT OF GENERATION	COUNTED	TO CENTRAL ACCUMULATION AREA	NOT COUNTED	MANAGED IN A PBR UNIT	NOT COUNTED	DANGEROUS WASTE DISPOSED IN COMPLIANCE WITH PBR PROVISIONS
						
POINT OF GENERATION	COUNTED	TO CENTRAL ACCUMULATION AREA	NOT COUNTED	MANAGED IN A PBR UNIT	COUNTED	DANGEROUS WASTE DISPOSED OUTSIDE OF THE PBR PROVISIONS

## Domestic Sewage Exclusion

The domestic sewage exclusion (DSE) allows you to discharge dangerous waste to a POTW under specific conditions. Discharge is allowed **only** when:

- The wastes are treatable at the POTW, and
- The discharger has a permit or other specific permissions from the POTW that authorizes the discharge of specific wastes.

In most cases the dangerous waste is excluded from reporting only after it enters the sanitary sewer system.

As Figure 5 shows:

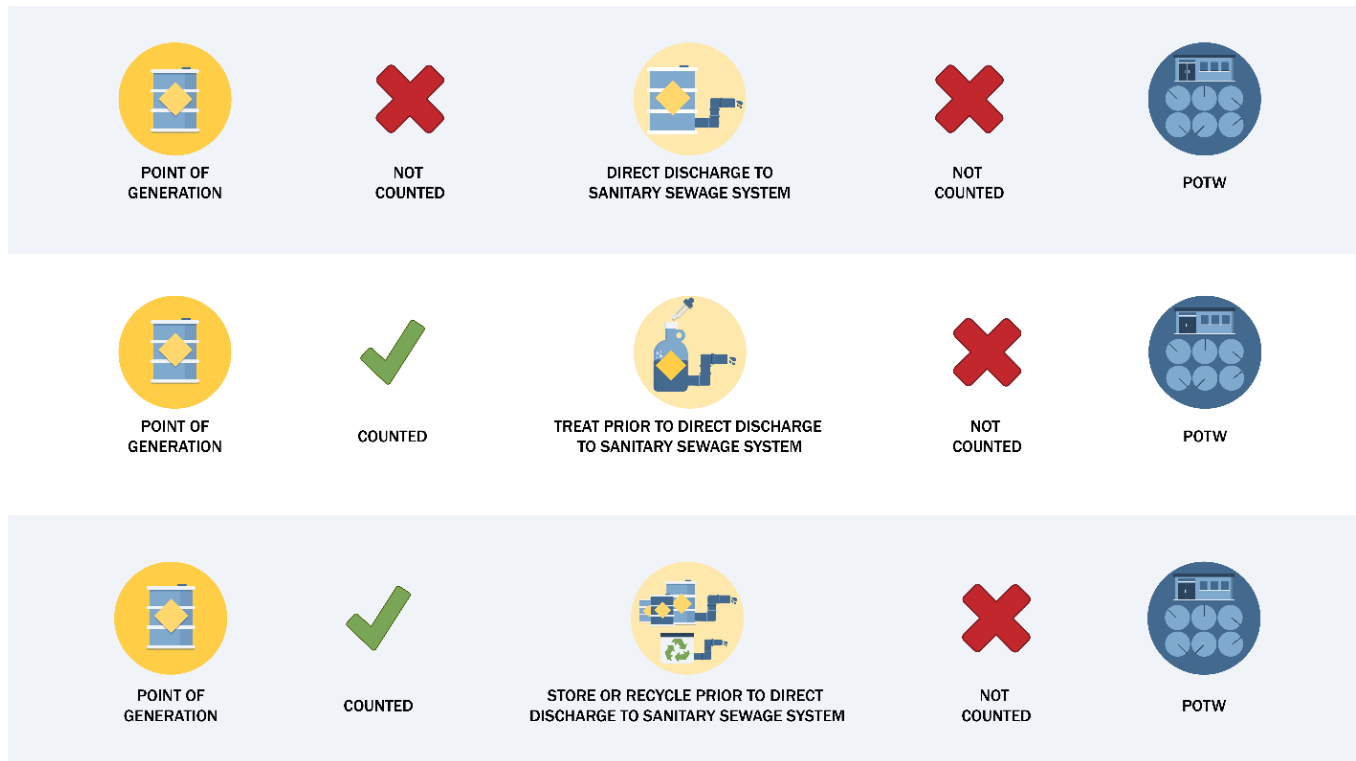
- Dangerous waste is counted when it is treated, stored, or recycled before direct discharge.
- Dangerous waste mixed with domestic sewage isn't counted when the waste is being directly discharged into the POTW system.

For additional guidance on the Domestic Sewage Exclusion, refer to our [Domestic Sewage Exclusion](#)<sup>22</sup> publication and WAC 173-303-071(3)(a). Figure 5 illustrates when counting is applicable under the DSE.

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<sup>22</sup> <https://apps.ecology.wa.gov/publications/summarypages/2004041.html>

**Figure 5: Dangerous waste counted under DSE.**



# Counting and Annual Reporting Requirements

Counting dangerous waste is required for the Dangerous Waste Annual Report. All generators, transporters, TSDs, and recycling facilities with an EPA/State Identification Number are required to complete the annual report for each calendar year in which their ID number is active.

You must know if you're a small (SQG), medium (MQG), or large quantity generator (LQG). You must count and record the amount of dangerous waste you generate, treat, and recycle each month for the reporting year. Your reporting category is defined by the greatest quantity of dangerous waste generated in any one calendar month. For example, if you are an SQG for eleven months of a calendar year but becomes an MQG for one month, you would fill out the reporting forms as an MQG.

When submitting the Dangerous Waste Annual Report, you need to convert gallons to pounds. One method is to collect a typical gallon of waste and weigh it. Another method is to multiply the liquid's specific gravity by 8.34 (the weight of a gallon water in pounds) to convert gallons of liquid to a weight amount. Refer to the liquid's safety data sheet (SDS) for its specific gravity; note that if your liquid contains paint or other materials, the specific gravity may differ from the SDS.

## TurboWaste and Dangerous Waste Annual Reporting

We encourage all generators to submit the Dangerous Waste Annual Report electronically using [TurboWaste](#),<sup>23</sup> which reduces paper forms and can save you time.

## Dangerous Waste Annual Report Book

We maintain a dangerous waste annual report [user guide](#)<sup>24</sup> to help you select the correct reporting category and determine which forms to fill out.

For more information on annual reporting, including TurboWaste and paper reporting, please visit our [dangerous waste reporting requirements webpage](#).<sup>25</sup>

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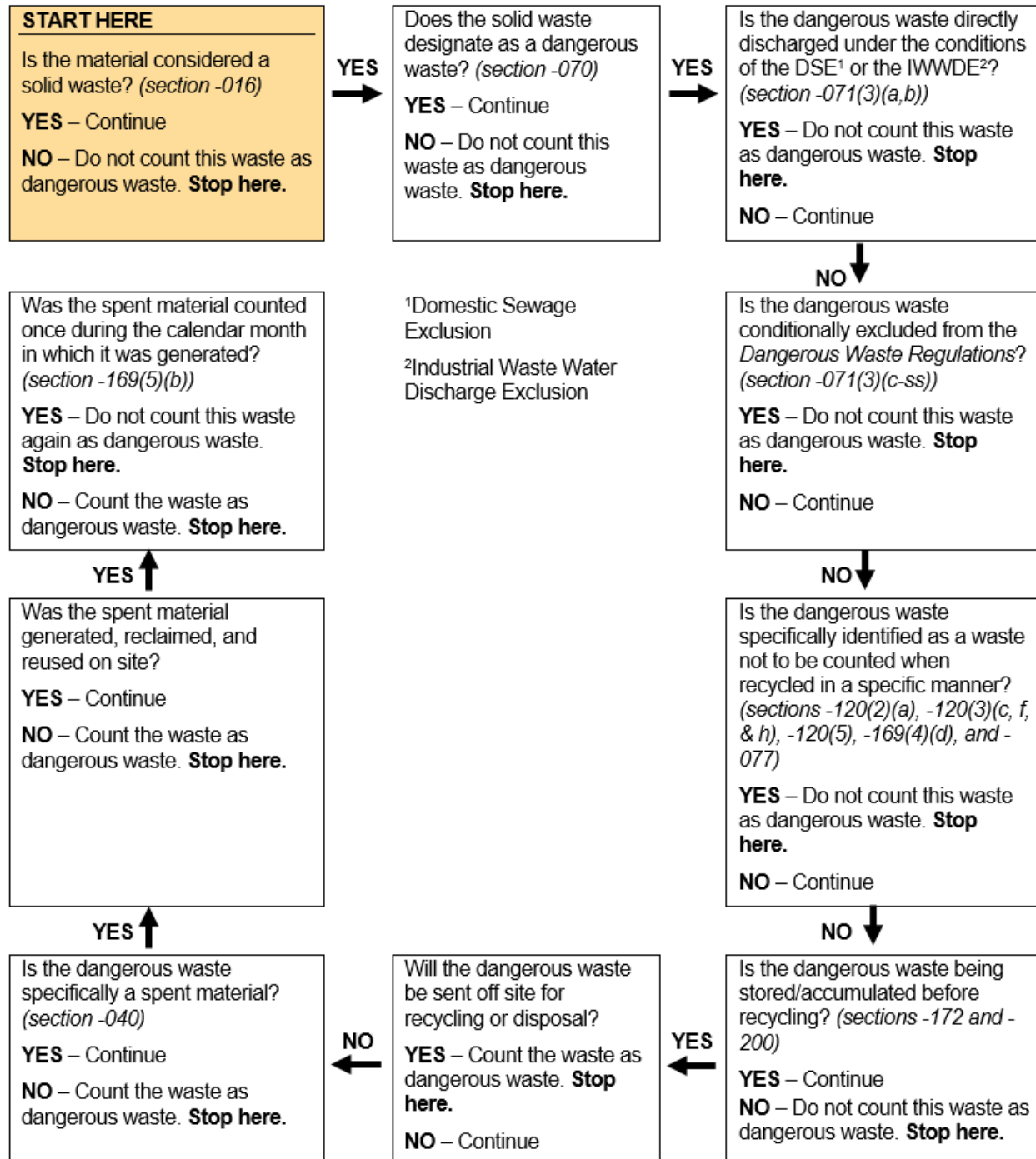
<sup>23</sup> <https://ecology.wa.gov/turbowaste>

<sup>24</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/2004056.html>

<sup>25</sup> <https://ecology.wa.gov/dangerous-waste-reporting>

# Flow Chart: Counting Dangerous Waste Involved in Recycling

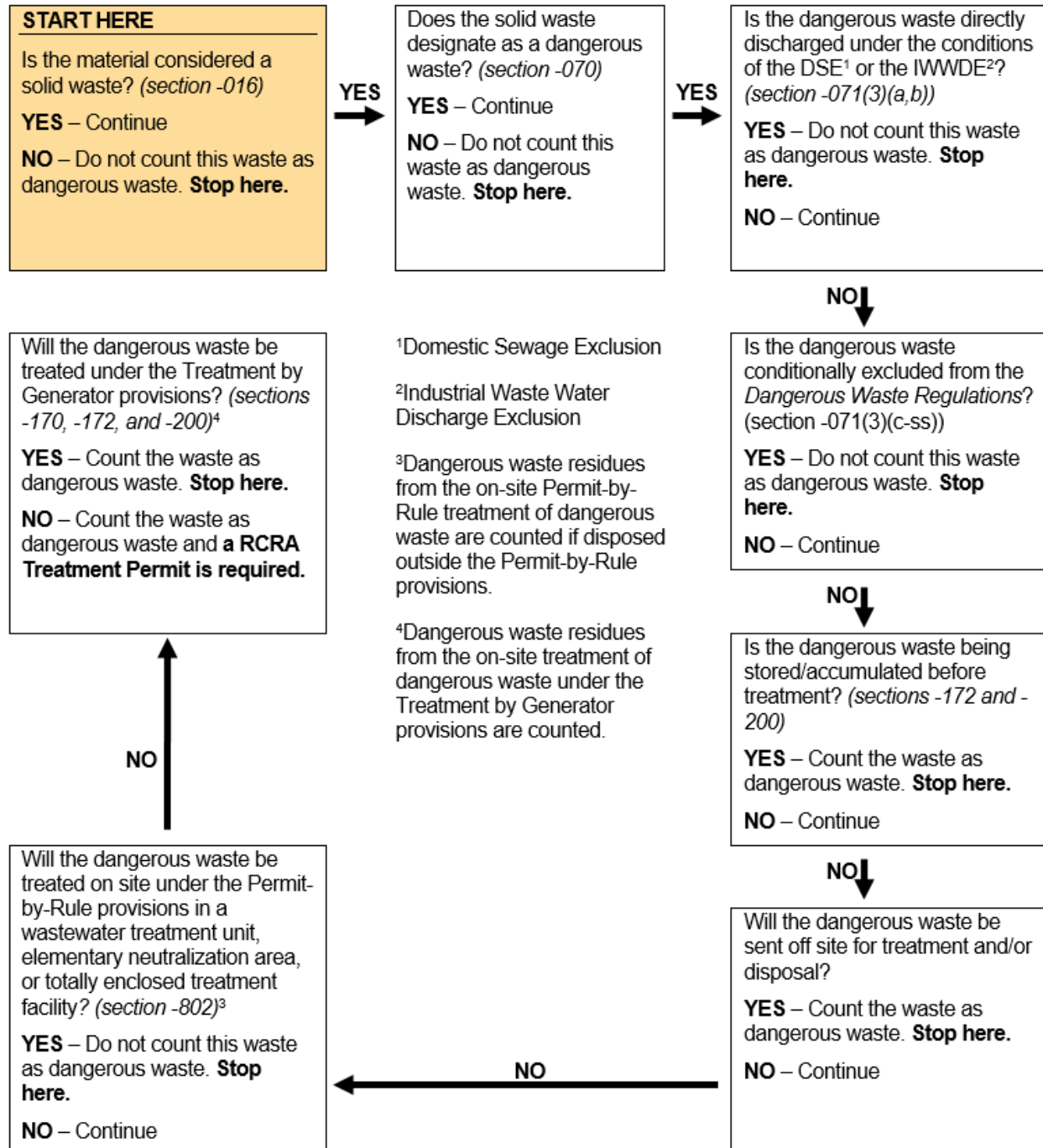
The sections listed after questions refer to Chapter 173-303 WAC. For example, "Section -016" is WAC 173-303-016.





# Flow Chart: Counting Dangerous Waste Involved in Treatment

The sections listed after questions refer to Chapter 173-303 WAC. For example, “section -016” is WAC 173-303-016.



## Appendix A

The flow chart, [Counting Dangerous Waste Involved in Recycling](#),<sup>26</sup> visually shows that if you generate a solid waste to be recycled that designates as dangerous waste, you must determine whether or not it counts towards your generator category.

The waste doesn't count if:

- The dangerous waste is directly discharged under the domestic sewage exclusion or industrial waste water discharge exclusion,
- The dangerous waste is conditionally excluded (section -071(3)(c-ss)),
- The dangerous waste is specifically identified as a waste not to be counted when recycled in a specific manner (sections -120(2)(a), -120(3)(c, f, & h), -120(5), -169(4)(d), and -077),
- The dangerous waste is immediately recycled on site (with no storage or accumulation), or
- The dangerous waste isn't sent off site for recycling or disposal.

If none of the above apply and the dangerous waste does not meet the definition of a spent material (defined under section -040), count it towards your generator category.

If the spent material was already counted once during the calendar month in which it was generated, don't count the waste again as dangerous waste.

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<sup>26</sup> Refer to Flow Chart: Counting Dangerous Waste Involved in Recycling section.

## Appendix B

The flow chart, [Counting Dangerous Waste Involved in Treatment](#),<sup>27</sup> visually shows that if you generate a solid waste that designates as a dangerous waste to be treated, you must determine whether or not it counts towards your generator category.

The waste doesn't count if:

- The dangerous waste is directly discharged under the domestic sewage exclusion or industrial waste water discharge exclusion,
- The dangerous waste is conditionally excluded (section -071(3)(c-ss)), or
- The dangerous waste is treated on site under the permit by rule provisions in a wastewater treatment unit, elementary neutralization unit, or totally enclosed treatment facility (-802(5)).

If you treat designated dangerous waste on site under treatment by generator provisions, it does count as dangerous waste towards your generator category. If you don't meet the treatment by generator provisions, you must obtain a RCRA Treatment Permit to conduct this activity.

Note:

- Dangerous waste residues from on-site permit by rule treatment of dangerous waste are counted if disposed outside the permit by rule provisions.
- Dangerous waste residues from the on-site treatment of dangerous waste under the treatment by generator provisions are counted.

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<sup>27</sup> See Flow Chart: Counting Dangerous Waste Involved in Treatment section.