Focus on: Large Quantity Generator Consolidation of Small Quantity Generator Dangerous Waste

Figure 1: Trucks are often used to transport SQG waste to its LQG consolidator.

Contact information

Questions? Contact your regional office for help.

Central Region Office
509-575-2490

Eastern Region Office
509-329-3400

Northwest Region Office
206-594-0000

Southwest Region Office
360-407-6300

ADA Accessibility

To request an ADA accommodation, contact Ecology by phone at 360-407-6700 or email at hwtrpubs@ecy.wa.gov, or visit ecology.wa.gov/ADA. For Relay Service or TTY dial 711.

When a large quantity generator (LQG) and a small quantity generator (SQG) are controlled by the same person, the LQG may be able to consolidate dangerous waste from the SQG without needing a permit. This may help organizations like universities, school districts, healthcare facilities,[1] or retail stores to:

- Streamline their dangerous waste management practices.
- Lead to more efficient off-site shipping.

To take advantage of this option, follow the SQG[2] and LQG[3] conditions for exemption under WAC 173-303-171(1)(e)(ix) and WAC 173-303-200(15), respectively. Inaccurately notifying as an LQG for the purpose of consolidating SQG dangerous waste is not allowed.

Federal and state generator categories

Federal and state regulations use different terms to identify generator categories. Keep this in mind when reading through U.S. Environmental Protection Agency (EPA) guidance and communications.

Comparison of federal and state terms to identify generator categories.

Environmental Protection Agency (Federal)	Ecology (Washington State)
LQG: Large quantity generator	**LQG**: Large quantity generator
SQG: Small quantity generator	**MQG**: Medium quantity generator
VSQG: Very small quantity generator	**SQG**: Small quantity generator

[1] If your site is a healthcare facility notifying under WAC 173-303-555, you cannot consolidate your dangerous waste pharmaceuticals under this regulation. (See https://app.leg.wa.gov/wac/default.aspx?cite=173-303-555.)
[2] Small quantity generators: https://apps.leg.wa.gov/wac/default.aspx?cite=173-303-171
[3] Large quantity generators: https://apps.leg.wa.gov/wac/default.aspx?cite=173-303-200

What does "under the same control" mean?

Both the sending SQG and receiving LQG must be under the control[4] of the same person (such as the same organization, owner, or operator). This person has the power to direct policies, whether through ownership or voting authority, in both facilities. The controlling person cannot be a third party like a contractor or consultant.

Figure 2: An LQG must generate LQG quantities of waste before accepting SQG waste for consolidation.

Figure 3: Notify Ecology before consolidating SQG and LQG dangerous waste.

Determine your generator category

If your site produces dangerous waste, it's your responsibility to accurately determine your generator category by counting how much waste you generate in a month. This can fluctuate throughout the year.

Small quantity generators

An SQG doesn't need to follow all the same dangerous waste regulations as medium or large quantity generators.

To qualify as an SQG, you must follow the SQG rules and generate the following within a calendar month:

- Less than or equal to 220 pounds (100 kg) of dangerous waste that is **not** acute hazardous waste (AHW)[5] and/or WT01 extremely hazardous waste (EHW).[6]
- Less than or equal to 2.2 pounds (1 kg) of AHW and/or EHW.
- Less than or equal to 220 pounds (100 kg) of 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 AHW and/or EHW.

Consolidation is only allowed between a LQG and an SQG.

A SQG site that has accumulated over the above-mentioned thresholds cannot consolidate waste.

Large quantity generators

An LQG is a fully regulated generator under the dangerous waste rules. More stringent requirements apply because more dangerous waste creates higher risk.

LQGs generate **any of** the following quantities of dangerous waste during a calendar month:

- Greater than or equal to 2,200 pounds (1,000 kg) of dangerous waste that is **not** AHW or EHW.
- Greater than 2.2 pounds (1 kg) of AHW and/or EHW.
- Greater than 220 pounds (100 kg) of 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 AHW and/or EHW.

[4] https://apps.leg.wa.gov/wac/default.aspx?cite=173-303-040
[5] https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-261/subpart-D/section-261.33
[6] https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/dangerous-waste-basics/designation/check-washington-state-only-criteria

Transport the waste

US Department of Transportation (USDOT) regulations apply to anyone shipping hazardous materials, including SQGs transporting their own dangerous waste. USDOT may require shipping labels, placards, and shipping documents depending on the quantity you are transporting. Be sure to check requirements with the Washington State Utilities and Transportation Commission.

Shipping papers may be useful for the LQG's recordkeeping if they meet the records criteria below. All dangerous waste transported off site from the LQG requires a permitted transporter and must be sent on a Uniform Hazardous Waste Manifest.

Keep your records

The LQG receiving facility must keep accurate records for each SQG dangerous waste shipment for five years. The records must include:

- Each SQG's information, including business name, site address, and site contact details.
- Descriptions of the dangerous waste received, amounts, and dates received.

For example, if you generate LQG quantities in August and the dangerous waste remains untreated and unshipped on site through September, you are an LQG for August, September, and until the waste is treated or managed off site within the required time frames.

Notify the Department of Ecology

If you plan to accept SQG waste under the LQG consolidation rules:

- Submit a notification, including Section 14, in RCRAInfo.[7]
- Notify us at least 30 days[8] before you receive the first SQG shipment, although we recommend allowing 60 days to make sure the forms are properly completed.

If there are any changes in the name or address of the sending SQG, the receiving LQG needs to submit an updated Site ID form, including Section 14, within 30 days of the change.

SQGs are not required to have an EPA/State ID number to transport their dangerous waste to an affiliated LQG. Please note that if you're transporting across state lines, both the sending and receiving locations must be located in states which have adopted EPA's Generator Improvement Rule, allowing for this activity.

Dangerous Waste Report

For reporting guidance see the RCRA reporting guide[9] or visit Ecology's dangerous waste report webpage.[10] For additional questions contact the dangerous waste reporting team at WA-RCRAInfo@ecy.wa.gov.

Manage your waste containers

Labeling

The SQG facility must manage and mark dangerous waste containers[11] according to LQG requirements prior to shipping:

- Label them so the words "Hazardous Waste" or "Dangerous Waste" are easy to read from 25 feet away or are at least ½ inch tall.
- Mark them with the waste's associated hazards (such as toxic, corrosive, ignitable, and/or reactive). This also needs to be easy to read from 25 feet away or at least ½ inch tall.
- Mark containers that are one gallon or less in size with lettering appropriate for the size of the container.

[7] https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login
[8] https://ecology.wa.gov/DWnotification
[9] https://rcrapublic.epa.gov/rcra-hwip/
[10] www.ecology.wa.gov/DWReport
[11] https://ecology.wa.gov/LabelDW

Figure 4: The LQG must accumulate SQG consolidated dangerous waste in a central accumulation area.

Figure 5: SQG dangerous waste must be counted before it is shipped to the LQG site for consolidation.

Figure 6: Our regional offices and inspectors can answer your questions.

Accumulation

An LQG can only accumulate an SQG's consolidated dangerous waste in a central accumulation area. Storage in a satellite accumulation area is not allowed.

The day the waste was received from the SQG must be marked on the containers as the accumulation start date. If you consolidate compatible SQG waste into LQG dangerous waste containers, mark the earliest (oldest) start date. For example, if you accepted SQG waste on April 15 and combined the contents into another container with a March 20 start date, use the earlier date of March 20 on the container.

Treatment of SQG waste

The received SQG dangerous waste becomes the LQG's waste and must be managed and disposed of under the LQG conditions for exemption. LQGs have the option to treat the SQG's dangerous waste as long as they follow generator rules for treatment.[12]

Waste counting is required

Your SQG facility must count its waste each month to determine its generator category. If the site exceeds any of the SQG amounts, it is not eligible to send its waste to an LQG.

SQG wastes received are not counted again toward the monthly generator category at the LQG site.

Figure 7: Keep accurate records of how much dangerous waste you have on site.

Language Services

The Department of Ecology offers free translation and interpretation services. To request them, email HWTRpubs@ecy.wa.gov or call 360-407-6700. If you call, please ask for an interpreter.

Español (Spanish). Ofrecemos servicios de traducción e interpretación sin costo. Para solicitar estos servicios, envíe un correo electrónico a HWTRpubs@ecy.wa.gov o llame al 360-407-6700. Si llama, pida que le conecten con un intérprete.

[12] https://apps.ecology.wa.gov/publications/summarypages/2004017.html