

# 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

**Central Regional Office:**  
509-575-2490

**Eastern Regional Office:**  
509-329-3400

**Northwest Regional Office:**  
206-594-0000

**Southwest Regional 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](mailto:hwtrpubs@ecy.wa.gov), or visit [ecology.wa.gov/accessibility](https://ecology.wa.gov/accessibility). For Relay Service or TTY call 711 or 877-833-6341.

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 systems, or retail stores:

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

To take advantage of this option, follow the [SQG](#)<sup>1</sup> and [LQG](#)<sup>2</sup> conditions for exemption under WAC 173-303-171(1)(e)(ix) and WAC 173-303-200(15), respectively. Inaccurately notifying as a large quantity generator for the purpose of consolidating small quantity generator dangerous wastes is not allowed.

## 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.

For the purposes of LQG consolidation of SQG dangerous waste, generator category is not based on the category reported in the facility's Dangerous Waste Annual Report. A facility's category is based on the volume of dangerous waste generated each month; therefore, it may fluctuate. The facility must be an LQG for the month that it receives waste from an affiliated SQG.

<sup>1</sup> <https://apps.leg.wa.gov/wac/default.aspx?cite=173-303-171>

<sup>2</sup> <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<sup>3</sup> 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: A truck carrying SQG dangerous waste to its LQG consolidator.



Figure 3: An LQG must generate LQG quantities of waste before accepting SQG waste for consolidation.

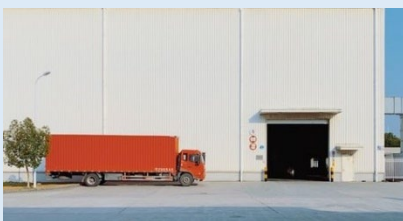


Figure 4: Notify Ecology before consolidating SQG and LQG dangerous waste.

### Small quantity generators

An SQG (or “very small quantity generator” under the federal rules) 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 of dangerous waste
- Less than or equal to 220 pounds of residue or contaminated media/debris from cleaning up an acutely hazardous or WT01 extremely hazardous waste spill
- Less than or equal to 2.2 pounds of acutely hazardous waste or state-only toxic, WT01 extremely hazardous waste

SQGs that accumulate more than 2,200 pounds of dangerous or 2.2 pounds of acutely hazardous waste on-site need to follow LQG conditions for exemption. In this case, an SQG cannot send waste to an LQG; the waste must be sent to a permitted treatment, storage, and disposal facility (TSDF).

### Large quantity generators

An LQG is a fully regulated generator under the dangerous waste rules. More stringent requirements apply since 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 of dangerous waste
- Greater than 220 pounds of residue or contaminated debris from cleaning up an acutely hazardous or WT01 extremely hazardous waste spill
- Greater than 2.2 pounds acutely hazardous waste or state-only toxic, WT01 extremely hazardous waste

If you exceed any of the limits listed above, you remain an LQG until all of the dangerous waste you have on-site **at the time you became an LQG** has been properly treated or disposed of at a TSDF.

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 timeframes.

<sup>3</sup> <https://apps.leg.wa.gov/wac/default.aspx?cite=173-303-040>

## 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 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.

## Notify the Department of Ecology

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

- Fill out an updated pre-printed Dangerous Waste Site Identification form (from [TurboWaste](#))<sup>4</sup> and an [LQG Consolidation Addendum](#).<sup>5</sup>
- Mail the completed documents to the Department of Ecology.

[Notify us at least 30 days](#)<sup>6</sup> 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 Dangerous Waste Site Identification Form and addendum within 30 days of the change.

SQGs are not required to have an EPA/state ID number to transport their dangerous wastes 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.

## Filing your Dangerous Waste Annual Report

When you file your [Dangerous Waste Annual Report](#),<sup>7</sup> you must use the highest generator category you have held during the reporting year. However, notifying as an LQG for the purpose of consolidating SQG dangerous waste is not allowed.

## Manage your waste containers

### Labeling

The SQG facility must [manage and mark dangerous waste containers](#)<sup>8</sup> 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.

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

<sup>5</sup> <https://apps.ecology.wa.gov/publications/summarypages/ecy070603.html>

<sup>6</sup> <https://ecology.wa.gov/DWnotification>

<sup>7</sup> <https://ecology.wa.gov/DWReport>

<sup>8</sup> <https://ecology.wa.gov/LabelDW>



### 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](#).<sup>9</sup>

### 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 5: The LQG needs to accumulate SQG consolidated dangerous waste in a central accumulation area.



Figure 6: SQG dangerous waste must be counted before it is shipped to the LQG site for consolidation.



Figure 7: Our regional offices and inspectors can answer your questions.



Figure 8: Keep accurate records of how much dangerous waste you have on-site at all times.

### Questions?

Please contact your regional office for more information.

- Central Regional Office: 509-575-2490
- Eastern Regional Office: 509-329-3400
- Northwest Regional Office: 206-594-0000
- Southwest Regional Office: 360-407-6300

<sup>9</sup> <https://apps.ecology.wa.gov/publications/summarypages/2004017.html>