The National Park Service
EnviroFact Sheet

Environmental Management Program
Mailing/E-mail Address
Washington, DC XXXXX
(202) XXX-XXXX

Managing Hazardous Waste: Determining Generator Status (HW-4)

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DRAFT

Generator status is determined by the amount of hazardous waste generated each calendar month (i.e., **actual** generation, not an **average** over time). If operations at your facility generate hazardous waste, you must determine your facility's *hazardous waste generator status.* Hazardous waste generator classes include:

Conditionally Exempt Small Quantity Generators (CESQG). Facilities generating 220 pounds (100 kilograms) or less of hazardous waste and/or less than or equal to 1 kg of acutely hazardous waste per month.

Small Quantity Generators (SQG). Facilities generating more than 220 pounds (100 kilograms) but less than 2,200 pounds (1,000 kilograms) of hazardous waste per month.

Large Quantity Generators (LQG). Facilities generating more than 2,200 pounds (1,000 kilograms) and/or more than 1 kg of acutely hazardous waste per month.

An NPS facility that exceeds the allowable limits for a CESQG or SQG in any single month is required to comply with the requirements for the next higher generator classification for *that* month.

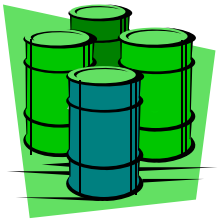
It is a good practice to maintain an inventory of the type and quantity of all waste generated at the park (even non-hazardous waste) to provide proof of your generator status.

FOR MORE INFO…

RCRA Hotline Training Modules: See "Generators" at: http://www.epa.gov/epaoswer/hotline/modules.htm

NPS hazardous waste EnviroFact Sheets: "Generator Requirements (HW-2)" and "Hazardous Waste Identification (HW-1)."

APPLICABLE REGULATIONS



The Resource Conservation and Recovery Act (RCRA) establishes basic hazardous waste management requirements applicable to the generators of hazardous waste. These requirements may be found at 40 CFR Parts 261 or 262, depending on an individual park's operations and the amount of hazardous waste generated by that park on a monthly basis. The regulations are more stringent for facilities that generate more waste. To determine which of the regulations apply to your site, you must first determine your generator status. (For information about the regulations that apply to hazardous waste generators, see the EnviroFact Sheet "Hazardous Waste Management: Generator Requirements.")

While most states simply follow the federal regulations, states are allowed to have more stringent requirements. For example, states may differ in their definitions of LQG, SQG, and CESQG (some states recognize only large and small quantity generators). Your state's regulations must be reviewed to determine both your park's generator status and the applicable regulations.

COUNTING WASTE

As noted in the definitions above, generator status is based on the amount of waste generated *monthly*. In counting the monthly waste total, a generator must distinguish between what should and should not be measured. Following are measuring guidelines that will be helpful to you.

DO measure (or count) all quantities of hazardous wastes that are:

- Accumulated on the property before disposal or recycling;
- Packaged and transported away from your facility;
- Placed directly in a regulated treatment or disposal unit at the park (e.g., placed in a 55-gallon drum); and/or
- Generated as still bottoms or sludges and removed from product storage tanks.

DO NOT measure wastes that are:

- Being managed under other RCRA Programs (examples include lead-acid batteries that will be reclaimed, scrap metal that will be recycled, used oil managed under the used oil provisions of 40 CFR 279, and universal wastes, such as batteries, pesticides, thermostats, and lamps that are managed under 40 CFR 273);
- Left in the bottom of containers that have been thoroughly emptied through conventional means such as pouring or pumping;
- Left as residue in the bottom of tanks storing products, if the residue is not removed from the product tank;
- Reclaimed continuously on site without storing prior to reclamation;
- Managed in an "elementary neutralization unit," a "totally enclosed treatment unit," or a "wastewater treatment unit," without being stored first;
- Discharged directly to publicly owned treatment works (POTWs) without being stored or accumulated first (this discharge to a POTW must comply with the Clean Water Act); or
- Already counted once during the calendar month, are treated on site or reclaimed in some manner, and used again.

POLLUTION PREVENTION

Once you have determined your facility's hazardous waste generator status, you can then determine which RCRA regulations apply to your facility's operations. Requirements applicable to CESQGs are much less stringent than those that apply to small and large quantity generators. Once your hazardous waste streams have been identified, look for pollution prevention methods that will reduce the generation of those wastes. For example, explore the possibility of using non-hazardous solvents in parts washers; use only latex-based instead of oil-based paints; or ensure that used oil is never mixed with any other substance that could make it a hazardous waste instead of a recyclable waste.

DETERMINING HAZARDOUS WASTE GENERATOR STATUS CHECKLIST	
Checklist Item	**Notes**
1. Determine which hazardous waste generator status categories are recognized by your state.	
2. When counting monthly waste generation, ensure that the following are NOT counted (confirm state allowances): • Wastes that are managed immediately upon generation in on-site elementary neutralization units, wastewater treatment units, or totally enclosed treatment facilities; • Wastes that are recycled, without prior storage or accumulation, in an on-site process subject to regulation under Section 261.6(c)(2); • Used oil that is properly recycled; • Spent lead-acid batteries that are properly recycled; or • Universal wastes (confirm list of state-approved universal wastes).	
3. Ensure that the quantity of hazardous waste generated each calendar month is counted and that records indicating monthly waste totals are maintained.	
4. Determine if the park generates any of the following wastes, and if so, whether they are counted toward the facility's monthly hazardous waste totals: • Waste Mineral Spirits/Thinners • Waste Paint/Aerosol Cans • Waste Paint • Turpentine/Wood Conditioner • Fluorescent Tubes • Auto Shop Floor Sweep • Absorbent Pads (Drum Tops/Spill Containment) • Lead Paint Chip Contaminated Debris • Creosote Treated Lumber (Operation Clean Beaches) • Lead/Copper • Lead Acid Batteries • Nickel Cadmium Batteries • Mixed Drift Wood & Assorted Debris (Operation Clean Shores) • Used Motor Oil • Used Propylene Glycol Antifreeze • Soot/Diesel No. 2 Fuel • Scrap Metal (e.g., steel, aluminum) • Recyclables (Aluminum, Plastic, Tin, Glass) • Mixed Paper/Cardboard • Used Tires • Used Ethylene Glycol Antifreeze • Used Oil Filters	