



## Quick Guide for Small Quantity Generators of Hazardous Waste

You are considered a Small Quantity Generator (SQG) if you generate between 100 and 1,000 kg (220 and 2,200 lbs) of hazardous waste and no more than one kilogram (2.2 lbs) of acutely hazardous waste per calendar month.

### Summary of SQG Requirements\*

Some requirements have changed due to an update of Nevada’s hazardous waste regulations adopted on **August 25, 2020** and are indicated with a superscript and explained in detail below the table.

Requirement	Application for SQG	Federal Citation ( <a href="#">40 CFR</a> )
EPA ID Number	Required	262.18
Re-notification <sup>1</sup>	Required starting September 1, 2021 and every 4 years thereafter	262.18(d)
On-site accumulation quantity limit without RCRA permit	≤6,000 kg	262.16(b)(1)
On-site accumulation time limit without RCRA permit	≤180 days or ≤270 days (if transporting greater than 200 miles)	262.16(b)-(d)
Personnel Training	Basic training required	262.16(b)(9)(iii)
Contingency Plan & Quick Reference Guide	Basic planning required	262.16(b)(9)
Preparedness and Prevention	Required	262.16(b)(8)-(9)
Land Disposal Restrictions	Required	Part 268 from 262.16(b)(7)
Manifests <sup>2</sup>	Required	Part 262 Subpart B
Labeling for shipment off-site <sup>3</sup>	Required	262.30 - 262.33
Biennial Report	Not Required	
Exception report	Required	262.42(b) and 262.43
Recordkeeping	Records of waste testing, manifests, and exception reports are required	262.11(f) and 262.40(a) and (d)
Off-site shipments	Must be sent to RCRA permitted facility	Part 264 - Part 267, Part 270
Hazardous Waste Determinations <sup>4</sup>	Must be made at point of generation	262.11
Closure	Required for tanks, drip pads and containment buildings	262.16(b)(3)(vi); Part 265, subpart W and DD

\* This is only a summary and does not include all SQG requirements.

- 1. RE-NOTIFICATION.** Under the Generator Improvement Rule, SQGs are now required to re-notify starting in 2021 and every four years thereafter using EPA Form 8700–12. This re-notification must be submitted by September 1<sup>st</sup> of each year in which re-notifications are required. [Learn more](#)

ARE YOU A  
**SMALL QUANTITY GENERATOR (SQG)**  
OF HAZARDOUS WASTE?

You are now **required to re-notify every 4 years**. Update your Notification of RCRA Subtitle C Activities (Site Identification Form), also known as EPA Form 8700-12, by

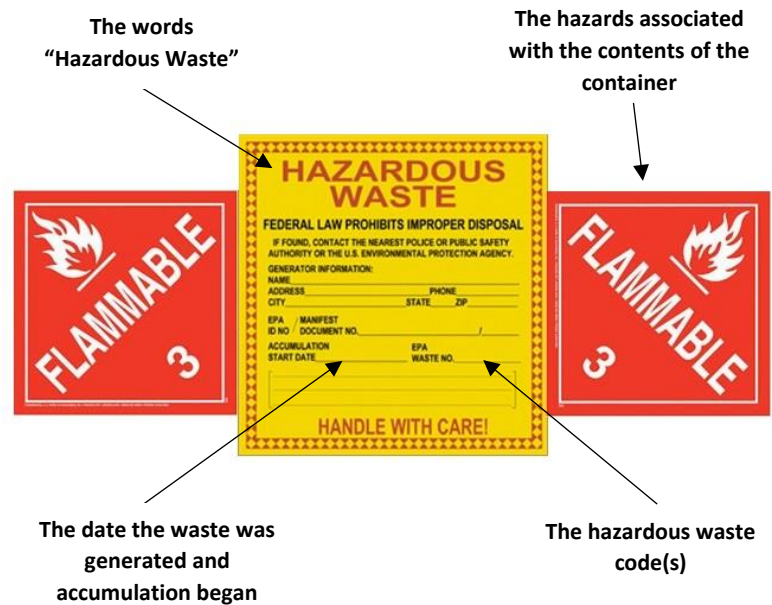
**SEPTEMBER 1, 2021**

2. **MANIFESTS.** Under the Electronic Manifest Rule, SQGs are no longer required to submit copies of manifests to the State and are encouraged to use the [electronic manifest system](#) to track shipments of hazardous waste.
3. **LABELING FOR OFF-SITE SHIPMENT.** Under the Generator Improvements Rule, the labeling requirements for off-site shipments have been updated. In addition to existing hazardous waste labeling requirements, shipments of hazardous waste are now required to list the hazards associated with the wastes.

Waste generators may use one of several established methods to indicate the waste hazards, including:

- ✓ DOT hazard communication consistent with 49 CFR part 172 subpart E (labeling) or subpart F (placarding)
- ✓ OSHA hazard statement or pictogram, as described in the OSHA Hazard Communication Standard in 29 CFR section 1910.1200
- ✓ NFPA code 704 chemical hazard label
- ✓ RCRA hazardous waste characteristic (i.e., ignitable, corrosive, reactive, toxic)

**EXAMPLE OF PROPER HAZARDOUS WASTE LABEL:**



4. **HAZARDOUS WASTE DETERMINATIONS.** Under the Generator Improvements Rule, five changes were made to the hazardous waste determination requirements (40 CFR 262.11). The Generator Improvements Rule:

- 1) Specifies that the solid and hazardous waste determination be accurate and expanded on why the hazardous waste determination is important; i.e., to ensure the proper management of the waste within the RCRA framework;
- 2) Requires the hazardous waste determination for each solid waste be made at the point of waste generation, before any dilution, mixing, or other alteration of the waste occurs, and at any time during its management that it has, or may have, changed its properties because of exposure to the environment or other factors, such that its waste classification may have changed;
- 3) Incorporates regulatory language that elaborates on how to make a hazardous waste determination for listed and characteristic hazardous waste;
- 4) References the applicable RCRA regulations for identifying possible exclusions or exemptions for the hazardous waste in 40 CFR section 262.11(e); and
- 5) Moves the independent recordkeeping and retention requirements for hazardous waste determinations currently found at 40 CFR section 262.40(c) into section 262.11(f), with clarifications on what records must be kept.

**Did you know...**

With the adoption of Generator Improvements Rule, Nevada now allows regulated facilities to use the Alternative Standards for Episodic Generation.

40 CFR 262.13(c)(8) states that hazardous waste managed as part of an episodic event does not have to be counted toward a generator's category. An "episodic event" means an activity or activities, either planned or unplanned, that 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. Find the complete Alternative Standards for Episodic Generation at [40 CFR Subpart L](#).

## Most Common Violations for SQGs:

### 1. CONTAINER LABELING AND MANAGEMENT (40 CFR 262.16(b)(6))

- Label each container with the words “Hazardous Waste,” the date that the first drop of hazardous waste was put into the container, add EPA waste codes on the label per NAC, and the hazards of the contents of the container (e.g., ignitable, corrosive, toxic, or reactive or another nationally recognized hazard label).
- Use a container made of—or lined with—a material that is compatible with the hazardous waste to be stored. This will prevent the waste from reacting with or corroding the container.
- Keep all containers holding hazardous waste closed during storage, except when adding or removing waste. Do not open, handle, or store (e.g., stack) containers in a way that might rupture them, cause them to leak, or otherwise fail.
- Inspect container storage areas at least weekly. Look for leaks and for deterioration caused by corrosion or other factors. Generators need to keep a written record of the weekly inspections for at least three years.
- Keep the containers in good condition. If a container leaks, put the hazardous waste in another container, or contain it in some other way that complies with EPA regulations.
- Take precautions to avoid mixing incompatible wastes or materials in the same container to prevent dangerous situations.
- If a generator chooses to accumulate waste at Satellite Accumulation Areas (SAA), the generator must label the SAA and include the words “Hazardous Waste” and a description of the hazards associated with the contents of the container.

### 2. FAILURE TO KEEP HAZARDOUS WASTE CONTAINERS CLOSED WHEN NOT ADDING OR REMOVING HAZARDOUS WASTE

(40 CFR 262.16(b)(2)(iii)(A)-(B), 264.173, & 265.173)

- Other than when adding to, or removing from, a hazardous waste storage container or tank, hazardous waste storage containers and tanks must remain closed at all times.
- Any activity (opening, handling, or storing) that would conclude in a rupture or leak of the hazardous waste storage container would make the container an “open” container.
- Stacking containers may result in a rupture or leak. Inspect container storage areas at least once every seven days. Generators need to keep a written record of the weekly inspections for at least three years.
- Keep the containers in good condition. If a container leaks, put the hazardous waste in another container, or contain it in some other way that complies with EPA regulation (container requirements under 40 CFR Parts 264/265, Subpart I and 40 CFR subsection 261.7).
- Take precautions to avoid mixing incompatible wastes or materials in the same container to prevent dangerous incidents.



*This container is considered “open”. If not actively adding to or removing from the container, remove funnel and close the container.*

## Universal Waste:

If you are an SQG and manage waste that includes [batteries](#), pesticides, mercury-containing equipment, and/or [lamps](#), your facility may be eligible for exemptions under the [universal waste regulations](#) if you meet all of the streamlined requirements. Aerosol cans cannot be managed under the universal waste regulations in Nevada. Once subject to the universal waste regulations, universal wastes do not need to be counted toward a generator’s status. Materials managed as universal waste can be stored for a year and are not required to be shipped with a manifest or by a hazardous waste transporter. A large quantity handler of universal waste must keep a record of each shipment of universal waste received and sent and must retain those records for at least three years (40 CFR 273.39). Although it is not required for small quantity handlers of universal waste, it is recommended that you keep track of universal wastes sent off-site for recycling and keep receipts for at least three years (40 CFR 273.19).

## Source Reduction:

As an SQG, a good faith effort to minimize your waste generation is required and a waste minimization certification is required under 40 CFR 262.27(b). This certification is located on the uniform hazardous waste manifest at item 15. Since your generator status determines the number of requirements that legally apply to you, it is to your advantage to minimize the amount of hazardous waste you generate. This not only reduces the burden of regulations but also can reduce waste management costs and can improve the competitiveness of your business. In many cases operating practice improvements, including housekeeping and inventory control, can dramatically reduce waste generation and associated costs. Alternative, less-hazardous products can be found for many applications which can eliminate hazardous waste production, and production processes and service operations can be designed or modified to eliminate or reduce waste. For more information about source reduction techniques applicable to your business contact the [Business Environmental Program](#) at (800) 882-3233.

*Let's make sustainable attainable.*

### **For questions regarding Small Quantity Generator requirements, contact:**

#### **Mandy Hood**

Environmental Scientist  
Bureau of Sustainable Materials Management  
Nevada Division of Environmental Protection  
Department of Conservation and Natural Resources  
901 S. Stewart Street, Suite 4001 Carson City, NV 89701  
[mhood@ndep.nv.gov](mailto:mhood@ndep.nv.gov)  
775-687-9464