



Summary of Idaho Hazardous Waste Generator Requirements

	Conditionally Exempt Small Quantity Generator (CESQG)	Small Quantity Generator (SQG)	Large Quantity Generator (LQG)
Weight of Waste Generated/ Calendar Month	<ul style="list-style-type: none"> • ≤220 lbs HW and • ≤2.2 lbs AHW 	<ul style="list-style-type: none"> • 220 lbs to 2,200 lbs HW and • ≤2.2 lbs AHW 	<ul style="list-style-type: none"> • ≥2,200 lbs HW or • >2.2 lbs AHW
Inventory	<ul style="list-style-type: none"> • Identify all HW on site • Determine pounds-per-month generated 	<ul style="list-style-type: none"> • Identify all HW on site • Determine pounds-per-month generated 	<ul style="list-style-type: none"> • Identify all HW on site • Determine pounds-per-month generated
Notification	<ul style="list-style-type: none"> • No requirement; may obtain EPA ID number 	<ul style="list-style-type: none"> • Notify Idaho DEQ to obtain EPA ID number 	<ul style="list-style-type: none"> • Notify Idaho DEQ to obtain EPA ID number
Accumulation Time and Quantities	<ul style="list-style-type: none"> • If more than 2,200 lbs HW is accumulated, CESQG becomes SQG • If more than 2.2 lbs of AHW is accumulated, CESQG becomes LQG • No accumulation time frames 	<ul style="list-style-type: none"> • If more than 13,200 lbs of HW or 2.2 lbs of AHW is accumulated, then SQG becomes LQG • Can store HW up to 180 days (270 days if TSD is more than 200 miles away) 	<ul style="list-style-type: none"> • Can store HW up to 90 days
Satellite Accumulation	<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • Same as LQG 	<ul style="list-style-type: none"> • Can store up to 55 gallons of HW or up to 1 quart AHW at or near point of generation, under direct control of operator for an indefinite period • Accumulation date added within 72 hours of accumulation limit • Container must list contents
Container Marking Requirements	<ul style="list-style-type: none"> • No requirement 	<ul style="list-style-type: none"> • Same as LQG 	<ul style="list-style-type: none"> • Container must display: <ul style="list-style-type: none"> - the words “hazardous waste” - accumulation start date
Container Requirements	<ul style="list-style-type: none"> • No direct requirements, but containers should be kept closed and should not leak 	<ul style="list-style-type: none"> • Same as LQG except: <ul style="list-style-type: none"> - there is no requirement to store ignitable or reactive waste 50 feet from property line 	<ul style="list-style-type: none"> • Store HW in containers that are: <ul style="list-style-type: none"> - compatible with the HW - closed unless adding/removing waste - handled carefully to avoid damage - in good condition • Segregate containers <ul style="list-style-type: none"> - store ignitable or reactive waste 50 feet from property line - store incompatibles separately • Inspect containers weekly
Tank Requirements	<ul style="list-style-type: none"> • No direct requirements, but tanks should be kept closed and should not leak 	<ul style="list-style-type: none"> • Extensive requirements; see regulations or call DEQ 	<ul style="list-style-type: none"> • Extensive requirements; see regulations or call DEQ
Containment Building Requirements	<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • Extensive requirements; see regulations or call DEQ
Waste Minimization	<ul style="list-style-type: none"> • No requirement 	<ul style="list-style-type: none"> • Certify on manifest good faith effort to minimize waste generation 	<ul style="list-style-type: none"> • Certify on each manifest that you have a waste minimization program in place
Reporting	<ul style="list-style-type: none"> • No requirement 	<ul style="list-style-type: none"> • State annual report • Exception letter filed within 60 days of shipment 	<ul style="list-style-type: none"> • State annual report • Exception reports filed within 45 days of shipment • Federal biennial reports

Key to Abbreviations/ Acronyms

AHW = acutely hazardous waste
CESQG = conditionally exempt small quantity generator
DEQ = Department of Environmental Quality
DOT = Department of Transportation

EPA = Environmental Protection Agency
HW = hazardous waste
lbs = pounds

LDR = land disposal restrictions
LQG = large quantity generator
SQG = small quantity generator
TSD = treatment, storage, or disposal facility

	Conditionally Exempt Small Quantity Generator (CESQG) (cont.)	Small Quantity Generator SQG (cont.)	Large Quantity Generator (LQG) (cont.)
Preparedness and Prevention	<ul style="list-style-type: none"> No requirements 	<ul style="list-style-type: none"> Same as LQG 	<ul style="list-style-type: none"> Manage HW to minimize possibility of release or emergency Designate emergency coordinator(s) Maintain emergency response equipment in working order Maintain aisle space to allow access of emergency equipment Familiarize local authorities and hospitals with facility and properties of HW
Emergency Response Information	<ul style="list-style-type: none"> No requirement 	<ul style="list-style-type: none"> Post the following by the telephone at location of HW generation or accumulation: <ul style="list-style-type: none"> name, 24 hour phone number and address of emergency coordinator(s) location of fire extinguishers, alarms, and spill control equipment fire department phone number 	<ul style="list-style-type: none"> Prepare and maintain contingency plan Extensive requirements; see regulations or call DEQ
Shipping Requirements	<ul style="list-style-type: none"> No specific RCRA requirements <ul style="list-style-type: none"> check with DOT no manifest required take to licensed solid waste facility OR TSD facility 	<ul style="list-style-type: none"> Same as LQG except: must ship waste within 180 days (270 days if TSD is located more than 200 miles away) May have tolling agreement with supplier 	<ul style="list-style-type: none"> Must package, label, and placard HW in accordance with DOT requirements Each container must be marked with: <ul style="list-style-type: none"> specific wording identifying contents as HW manifest number generator's name and address Use HW manifest Use transporters and TSD facilities with EPA ID numbers Ship waste within 90 days Send LDR notification/certification
Training	<ul style="list-style-type: none"> No requirement 	<ul style="list-style-type: none"> Employees must be familiar with proper waste handling and emergency procedures 	<ul style="list-style-type: none"> Training by person qualified in HW management must be documented for each job title that handles hazardous waste; training should cover: <ul style="list-style-type: none"> regulatory compliance emergency response emergency equipment Include annual review
Records on File	<ul style="list-style-type: none"> No requirement 	<ul style="list-style-type: none"> Manifests (3 years) Exception letters (3 years) Test results/sampling analysis (3 years) LDR notices (3 years) 	<ul style="list-style-type: none"> Manifests (3 years) Exception reports (3 years) Test results/sampling analysis (3 years) Training documents (3 years after employee termination) Inspection logs (3 years) Biennial reports (3 years) LDR documentation (3 years)

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For more information, contact Idaho Department of Environmental Quality at (208) 373-0502 or visit www.deq.idaho.gov. (Updated: June 2007)