

VERY SMALL QUANTITY GENERATORS (VSQGS)

If you generate no more than 100-kg (220-lb) of hazardous waste and no more than 1-kg (2.2-lb) of acute hazardous waste per month, you are a VSQG. As a VSQG in Florida, you must comply with just FOUR basic waste management requirements.

FIRST, IDENTIFY ALL HAZARDOUS WASTE THAT YOU GENERATE.

Inventory and assemble information about the wastes produced at your facility. Include all wastes that your business discards including sewered or recycled wastes, unusable products, and by-products. Safety Data Sheets (SDSs) for raw materials can also be used to help identify your wastes.

Answer the following questions for each waste stream on your inventory:

- 1. Is the waste **exempt** from regulation? (Refer to **Table 1** for examples)
- 2. Is the waste one of the **listed** wastes in **Subpart D of 40 CFR 261**? (Refer to **Table 2** for common listed wastes.)
- 3. Is the waste hazardous because it exhibits a hazardous **characteristic**? (Refer to **Table 3** for descriptions.)
 - a. If possible, use generator's knowledge of the waste and the way it was generated, including knowledge of the process that generated the waste, or information on its chemical and physical properties.
 OR –
 - b. **Analyze a representative sample** of the waste using the tests specified for each characteristic and determine if the results exceed the regulatory thresholds found in **Subpart C of 40 CFR 261**.

If your waste *is not exempt and you answered yes to question 2 or 3* for any waste produced, then your business generates hazardous waste. Your *generator status* is determined by the weight of all hazardous waste generated at your facility in a single calendar month.



SECOND, ALWAYS HAVE LESS THAN 1,000-KG (2,200-LB) OF HAZARDOUS WASTE ON SITE.*



For typical liquid hazardous wastes,
NEVER HAVE MORE
THAN FIVE
55-gallon drums on site.

*1-KG (2.2-LB) OF ACUTE HAZARDOUS WASTE

THIRD, YOU MUST ENSURE DELIVERY OF YOUR HAZARDOUS WASTE TO A FACILITY AUTHORIZED BY THE STATE OF FLORIDA TO ACCEPT COMMERCIAL HAZARDOUS WASTE.

DO NOT discard hazardous waste into the regular trash bin or dumpster.



FOURTH, KEEP RECORDS
OF HAZARDOUS WASTE
DISPOSAL FOR AT LEAST
THREE YEARS.

In Florida, a VSQG which chooses to send its hazardous waste to an off-site treatment, storage or disposal facility must keep records that include:

- ✓ the date of shipment
- ✓ the names and addresses of the VSQG and the destination facility
- ✓ the type and amount of hazardous waste
- ✓ keep at least three years



Hazardous Waste Tables

This information has been compiled from the federal RCRA rules to assist with hazardous waste identification and counting. Please refer to the rule sections noted in the tables for complete information.

TABLE 1: WASTES WITH EXEMPTIONS		
\rightarrow	E-waste, if recycled (40 CFR Part 261)	
\rightarrow	Scrap metal, if recycled (40 CFR Part 261)	
\rightarrow	Used oil filters, if properly drained and recycled (Chapter 62-710, F.A.C.)	
\rightarrow	Used oil, if recycled (40 CFR Part 279)	
\rightarrow	Spent lead-acid batteries, if reclaimed (40 CFR Part 266)	
\rightarrow	Universal waste aerosol cans, batteries, pesticides, and mercury-containing devices (40 CFR Part 273)	
\rightarrow	Mercury containing lamps and devices, if recycled (40 CFR Part 273 and Chapter 62-737, F.A.C.)	

Waste	TABLE 2: LISTED HAZARDOUS WASTES (40 CFR 261 Subpart D)	
Code	Hazardous wastes from non-specific sources:	
F001	Spent halogenated solvents used in degreasing , such as trichloroethylene, methylene chloride, 1,1,1-trichloroethane, and carbon tetrachloride	
F002	Spent halogenated solvents, such as those above, but not used as degreasers ; other examples are 1,1,2-trichloro-1,2,2-trifluoroethane and chlorobenzene	
F003	Spent nonhalogenated, ignitable-only solvents, such as xylene, acetone, methanol, and methyl isobutyl ketone	
F004	Spent nonhalogenated solvents, such as cresols, cresylic acid, and nitrobenzene	
F005	Spent nonhalogenated solvents, such as toluene, methyl ethyl ketone, carbon disulfide, and benzene; Spent solvent mixtures/blends containing 10% before use of F001, F002, F004 and/or F005; and solvent distillation bottoms	
Hazardous wastes from specific sources:		
K-list	Hazardous waste from specific sources, such as certain plating bath solutions, wastewater treatment sludge, and wastes from the heat treatment of metals	
P-list/ U-list	Discarded, unused commercial chemical products, off-specification products, containers, and/or spill residues	

TABLE 3: CHARACTERISTIC WASTES (40 CFR 261 Subpart C)		
D001	Ignitability: liquid wastes that have an alcohol content ≥24%; or have a flash point <140 °F. Examples are spent solvents, paint thinners, and non-empty aerosols.	
D001	Oxidizer: wastes that add oxygen to a fire. Oxidizing substances often have "per" as the beginning of the name, "oxide" as the ending of the name, or "ate" in its chemical name. Examples are perchlorates, peroxides, and ammonium nitrate.	
D002	Corrosivity: liquid waste materials having a pH <2.0 or >12.5. Examples are acids and caustics.	
D003	Reactivity: waste materials that react to water, shock, heat, or pressure, and undergo a rapid or violent chemical reaction. Some examples are explosives and cyanide wastes.	
D004 thru D043	Toxicity: wastes which release toxic metals or volatile organic chemicals above defined limits under acidic conditions. Includes 8 heavy metals and 32 organic chemicals, including 10 pesticides. Even very small amounts of heavy metals (e.g., mercury, arsenic, lead), organics (e.g., benzene, trichloroethylene, perchloroethylene, methyl ethyl ketone), or pesticides can make a waste characteristically hazardous.	

HELPFUL CONTACTS:

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