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## HOTLINE QUESTIONS AND ANSWERS

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### 1. Frequently Asked Questions on Hazardous Waste Generator Requirements

May large quantity generators (LQGs) and small quantity generators (SQGs) treat hazardous waste on site without obtaining a permit or interim status?

EPA has consistently maintained that a permit or interim status is not required if a LQG or SQG treats hazardous waste in accumulation units such as tanks or containers that are in full compliance with the requirements of 40 CFR 262.34 and the special unit-specific requirements found in Part 265 (March 24, 1986; 51 FR 10146, 10168). This treatment must be completed within the specified regulatory time limitations.

Must SQGs submit a Biennial Report for their hazardous waste management activities?

No, SQGs (generators of greater than 100 kg but less than 1,000 kg in a calendar month) are subject to the reporting requirements listed in 40 CFR 262.44. The Biennial Report regulation at 40 CFR 262.41 is not specifically listed in that section.

The 40 CFR Part 262 regulations, Standards Applicable to Generators, do not mention conditionally exempt small quantity generators (CESQGs). Where are the CESQG regulations found?

Unlike the LQG and SQG regulations that are found throughout Part 262, the CESQG requirements are found in 261.5. CESQGs are those generators who produce less than or equal to 100 kg of hazardous waste, less than or equal to 1 kg of acute hazardous waste or less than or equal to 100 kg of spill residue of acute hazardous waste per calendar month.

Must generators preparing an off-site shipment of hazardous waste list the EPA waste codes on the manifest?

EPA manifest regulations at 40 CFR 262.20 and Appendix to Part 262 do not require generators to list EPA waste codes on the manifest. The shaded space provided on the manifest for EPA waste codes is for the convenience of state agencies, as some states may require EPA waste codes to be listed on a manifest

(40 CFR 271.10(h)). The Department of Transportation (DOT) regulations may, however, require listing EPA waste codes as part of the DOT description (40 CFR 179.203 (k)(4)).