Very Small Quantity Generator (VSQG) Guidebook

A Hazardous Waste Management Guide for VSQGs

June 2022

PLEASE READ

This guidebook is intended for use as a guidance document only. It is to be used as a reference to the basic requirements of the Vermont Hazardous Waste Management Regulations (VHWMR) as they apply to VSQGs of hazardous waste. Persons using this document should clarify questions by either reviewing the appropriate sections of the VHWMR or contacting the Hazardous Waste Program.

Each subchapter and appendix of the VHWMR is posted online as a separate document that may be viewed or printed separately. The current VHWMR, effective February 1, 2022, are available online at: https://dec.vermont.gov/waste-management/hazardous/regulations.

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Regulatory Background

The VHWMR are administered by the Hazardous Waste Program of the Department of Environmental Conservation. They are based on the federal hazardous waste regulations and are intended to protect public health and the environment by comprehensively regulating the management of hazardous waste in Vermont. The VHWMR identifies the types of wastes that are regulated as hazardous and establish management standards for the businesses, municipalities, and other organizations (hereafter referred to simply as "businesses") that generate, transport, treat, store, dispose, and recycle them. Businesses that generate hazardous wastes are responsible for ensuring waste is managed safely from "cradle to grave" meaning from the time it is created, while it is transported, treated, and stored, and until it is ultimately disposed.

This guidebook replaces the Conditionally Exempt Generator Handbook and provides a general overview of the hazardous waste management requirements that apply to "Very Small Quantity Generators" (VSQGs). These businesses are only subject to basic waste handling requirements, as they tend to be small and produce or "generate" limited amounts of hazardous waste. This guidebook also provides an overview of the handling requirements that apply to VSQGs for **used oil** and **universal waste**.

Do I Generate Hazardous Waste?

Most people are aware that some businesses (e.g., manufacturers, drycleaners, vehicle repair shops) routinely generate hazardous waste, however for other types of businesses, it may be a little less obvious. For example, it may not be apparent that hazardous wastes could be generated from food production, or at schools, or retail stores. Upon closer examination, these businessess often generate hazardous wastes through the use of certain chemical products that may have a hazardous waste component. For example, in food production, a business may generate hazardous waste from a chemical compound used for sanitation. At schools, hazardous waste may be generated in science labs, art departments or through facility maintenance. In retail stores, certain products that are damaged or returned to the store may be hazardous. In all these examples, it is important to be aware of the chemicals and products that are being used, so that the business is aware that they are generating hazardous waste.

What is a Hazardous Waste Generator?

The VHWMR define a "generator" as any person, by site, whose act or process produces hazardous waste or whose act first causes hazardous waste to become subject to regulation. Wastes generated by a household, or "household hazardous waste" is exempt and not subject to regulation under the VHWMR. The Hazardous Waste Program recommends that household hazardous waste be brought to a collection event sponsored by a Solid Waste Management Entity listed in **Appendix J**.

> Note: Although household waste is exempt from the VHWMR, waste generated by a business operating out of a home is not exempt.

Generators are regulated based on the type(s) and quantity of hazardous waste produced on the property where their business is located. If a business operates (and generates hazardous waste) at more than one location, each property or "site" is regulated as a separate generator with its own EPA ID number. EPA ID numbers are further discussed in the "What Regulations Apply to VSQGs?" section of this document.

In Vermont, generators are grouped into three categories based on the type(s) and quantity of hazardous waste generated per month, as well as the total quantity of hazardous waste accumulated on-site:

Generator Category	Per Month	Total on-site
Very Small Quantity Generators (VSQGs)	Up to 220 pounds	Up to 2,200 pounds
Small Quantity Generators (SQGs)	Up to 2,200 pounds	Up to 13,200 pounds
Large Quantity Generators (LQGs)	2,200 pounds or more	No limit

What is a VSQG?

VSQGs produce the least amount of hazardous waste and as a result, are subject to the fewest and least stringent regulations.

VSQGs must:

- generate less than 220 pounds of *hazardous waste* per month.
- generate less than 2.2 pounds of ***acutely hazardous waste*** *(i.e., "P-Listed)* per month.
- generate less than 220 pounds of any residue or contaminated soil, waste, or other debris resulting from the cleanup of a discharge of any ***acutely hazardous waste*** per month.
- accumulate less than 2,200 pounds of *hazardous waste*, 2.2 pounds of acutely hazardous waste or 220 pounds of any residue or contaminated soil, waste, or other debris resulting from the cleanup of a discharge of any ***acutely hazardous waste*** per month.

If a business exceeds these limits, that business would be regulated as either an SQG or LQG.

HINT: When calculating generation rates, half of a 55-gallon drum of water weighs roughly 220 pounds, and five 55-gallon drums of water weigh about 2,200 pounds. The density of each type of hazardous waste will likely differ from that of water, however, keeping this in mind may help in determining your rate of generation based on the number of drums of hazardous waste that you generate per month.

What Waste is Regulated Under the VHWMR?

In general, waste is regulated as hazardous waste if it is specifically **"listed"** in the VHWMR, or if it exhibits one or more of four hazardous waste **"characteristics"** (i.e., ignitability, corrosivity, reactivity, or toxicity).

All hazardous wastes are identified by a four-character "hazardous waste code" that consists of one or two letters followed by two or three numbers (e.g., F005, VT02, D018). The general categories of hazardous waste, along with examples and their corresponding codes, are as follows:

Listed wastes: The five categories of listed hazardous waste are identified below. In Vermont, the "VT" and "F" wastes are more common than the "K," "P" and "U" wastes.

- **Vermont-listed wastes** ("VT" wastes): Vermont regulates eight specific wastes that are not regulated by the federal Environmental Protection Agency (EPA). Vermont-listed hazardous wastes include: wastes with >50 parts per million polychlorinated biphenyls (PCBs) (VT01); wastes with >5% by weight petroleum distillates (VT02); water-soluble metal working fluids (VT03); pesticidal wastes of products classified under FIFRA as restricted use pesticides (VT06); antifreeze (ethylene glycol) (VT08); corrosive solids (VT20); liquid wastes containing perfluorooctanoic acid (PFOA) in concentrations equal to or greater than 20 parts per trillion (VT21); and liquid wastes containing perfluorooctanesulfonic acid (PFOS) in concentrations equal to or greater than 20 parts per trillion (VT22). A full description of each Vermont-listed hazardous waste is provided in **Appendix A.**
- **Wastes from non-specific sources** ("F" wastes): There are 28 "F"-listed wastes produced by general (non-specific) processes. Examples include "spent halogenated solvents" (F001, F002); "spent non-halogenated solvents" (F003, F005); and "electroplating solutions and treatment sludges" (F006).

Characteristic wastes ("D" wastes)**:**

Ignitable waste (identified by the D001 code) is liquid with a flash point of less than 140° F; or is not a liquid and is capable under standard temperature and pressure of causing fire and creating a burning hazard; or is an ignitable compressed gas. Examples of the more common category of ignitable liquid waste include some petroleum-based parts cleaning solvents and solvent-based paints.

Corrosive waste (identified by the D002 code) is liquid with a pH of 2 or less or 12.5 or greater; or that corrodes steel at a rate greater than ¼ inch/year. Examples of corrosive wastes are battery acid and caustic drain cleaner. Corrosive solids are regulated as a "Vermont-listed waste" and are identified by the VT20 code.

Reactive waste (identified by the D003 code) may have any of the following properties: is normally unstable; reacts violently with water; forms a potentially explosive mixture with water; can generate toxic gases when mixed with water; is capable of detonation. Examples of reactive wastes include sodium metal, munitions, picric acid, and peroxide formers like diethyl ether.

Toxic wastes (identified by the D004 through D043 codes) are wastes that are capable of leaching one or more of 40 specific contaminants to groundwater. The list of contaminants includes eight metals (including arsenic, chromium, mercury, and lead), six pesticides, and 26 organic compounds (including benzene, which is a component of gasoline). A waste exhibits the toxicity characteristic if, when tested using the Toxicity Characteristic Leaching Procedure (TCLP), is found to contain any one of the 40 contaminants more than the "Regulatory Level" specified in the VHWMR.

Vermont VSQGs rarely generate the "K," "P" or "U" wastes listed below:

- **Wastes from specific sources** ("K" wastes). Appendix I of the VHWMR lists many hazardous wastes that result from specific processes (e.g., K001: Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol).

- **Acutely hazardous wastes** ("P" wastes). Appendix IV of the VHWMR lists the many compound-specific acutely hazardous wastes. More protective management standards apply to acutely hazardous wastes and to empty containers which have held acute wastes.

- **Discarded Commercial Chemical Products** ("U" wastes). Appendix III of the VHWMR lists these compound-specific wastes.

What is Used Oil and how is it Regulated?

Used oil is defined as any petroleum product refined from crude oil, or any synthetic oil, that has been used and has been contaminated by physical or chemical impurities. Used oil is a free-flowing liquid at standard temperature and pressure and has a flash point greater than 100 degrees (F). Used oil may include:

- Vehicle crankcase oils
- Transmission fluids
- Power steering fluids
- Machine gearbox oil
- Hydraulic oil
- Compressor oil
- Straight cutting oil
- Tramp oil
- Oil drained from evaporators

Used oil does *not* include materials refined from crude oil that are fuels (e.g., gasoline, jet fuel, and diesel fuel) or materials used as cleaning agents or solvents (e.g., naphtha or mineral spirits). Although used oil is exempt from regulation as hazardous waste under **Section 7-203(n)**, it is subject to the **Used Oil Management Standards** found in **Subchapter 8** of the VHWMR. For more information about used oil management, refer to the *Used Oil Fact Sheet* and *Used Oil Burning Fact Sheet* that are included as **Appendices C and D**.

What is Universal Waste and How is it Regulated?

Universal wastes are generally considered low risk wastes that are generated by a wide variety and large number of generators. These types of wastes are not exclusive to a specific industry or group of industries. Wastes that can be managed as universal wastes in Vermont include **batteries, certain pesticides, mercury thermostats, PCB-containing fluorescent light ballasts, lamps, mercury-containing devices** (e.g., mercury switches), **cathode ray tubes** (e.g., computer monitors and TV screens), **postconsumer paint** and **aerosol cans**.

Although exempt from regulation as hazardous waste under **Section 7-203(s)**, universal wastes are subject to the streamlined **Universal Waste Management Standards** found in **Subchapter 9** of the VHWMR. For more information about universal waste management, refer to the *Universal Waste Fact Sheet* that is included as **Appendix E.**

How Do I Determine if My Waste is Hazardous Waste?

Any waste that is to be disposed of must be evaluated to determine if it is potentially hazardous. To begin this hazardous waste determination process, it is helpful for VSQGs to prepare a list of *all*

wastes generated at their facility and how it is disposed. Most hazardous wastes generated by VSQGs are "VT-listed," "F-listed," or exhibit a hazardous waste characteristic. Some common examples include waste paint thinner, vehicle maintenance fluid, and oily debris. A list of common small business activities and some corresponding hazardous wastes is included as **Appendix B.**

HINT: When preparing a list of waste, consider:

- Process wastes, manufacturing by-products, and spent laboratory chemicals.
- Maintenance wastes, including spent sorbents, used oils, spent lamps, mercury-containing devices and parts washing solvent (even if the parts washing unit is maintained by a different company).
- Out-dated or otherwise un-needed chemicals or raw materials that are generated from an episodic event (see below).
- Spill cleanup material and contaminated debris (including oily debris) that is not episodic in nature.
- Emission-control dust and boiler blow-down water.

Note: 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. See **Appendix F** for more information regarding Episodic Events.

For each waste generated, determine if the waste is hazardous according to the following method:

1) Determine if the waste is exempt using **Sections 7-203 and 7-204** of the VHWMR. Note that many of the **Section 7-203** exemptions require that specific management conditions be met; the **Section 7-204** exemptions are all conditioned upon reuse or recycling. A list of commonly used exemptions is included in **Appendix H.**

EXAMPLES of hazardous waste exemptions include water-miscible metal working fluids, used oil, oil filters, contaminated wipes, used chlorofluorocarbon (CFC) refrigerants, scrap metal, lead-acid batteries, antifreeze, and universal waste (e.g., batteries, thermostats, fluorescent lamps, cathode ray tubes, mercury-containing devices, postconsumer paints, and aerosol cans).

2) If the waste is not exempt, the next step is to determine if it is "listed" as hazardous waste (i.e., is assigned a "VT," "F," "K," "P," or "U" code). Keep in mind that Vermont VSQGs rarely generate "K," "P" or "U" listed wastes.

3) If the waste is not listed, the generator must then determine if the waste exhibits any of the four hazardous waste "characteristics" (i.e., ignitability, corrosivity, reactivity, and toxicity).

To determine if a waste meets a listing or exhibits a hazardous waste characteristic, a generator can use either **knowledge of the process** that produces the waste or **laboratory testing**. For a generator to use process knowledge, sufficient information (such as that provided on manufacturer labels or Safety Data Sheets corresponding to raw materials or products used in the process) must be considered and available for review during an inspection. If sufficient information is not available to make a hazardous waste determination, it may be necessary to have a sample of the waste analyzed by a laboratory. Generators *must* keep all records supporting waste determinations.

HINT*:* Since testing can be expensive, it is important to provide the laboratory (or person collecting the sample) with as much information as possible about the waste; this will enable the laboratory to perform only those tests necessary to determine if the waste is hazardous waste. For example, if you know that arsenic is the only potentially hazardous contaminant in a waste, there is no need to test for other contaminants. Environmental laboratories and environmental consultants can be found with an online search using key words such as "environmental testing Vermont."

A generator can choose to assume that a waste is a characteristic hazardous waste without confirming if the waste meets the criteria of ignitability, reactivity or corrosivity, or if the concentration of a suspected contaminant exceeds toxicity characteristic limits. A generator may not, however, manage a waste as non-hazardous without confirming that the waste does not exhibit a hazardous waste characteristic through process knowledge or testing.

For assistance in making hazardous waste determinations, contact:

- Vermont's Hazardous Waste Program. Personnel with the Vermont Hazardous Waste Program are available to answer questions regarding hazardous waste management and can be reached during regular working hours at (802) 828-1138.

- Chemical Manufacturers and Suppliers, who are required by law to provide their customers with Safety Data Sheets or SDS (formerly known as Material Safety Data Sheets) for the chemical products they sell. SDSs provide information about the hazardous constituent(s) contained in a chemical product, the health and safety hazards posed by the product, and applicable *federal* regulations. SDSs do not provide information about applicable state regulations, or wastes generated through use of the product (e.g., an SDS for parts washing fluid does not include information about contaminants such as metals that may be introduced by the parts washing process.). In addition, some companies will intentionally leave out information on their SDSs as the product mixture may be proprietary.

- Trade Associations. National, regional, or state-wide trade organizations (e.g., auto dealers, wood product manufacturers, electrical providers, ski areas) may be able to provide information about specific hazardous waste management issues that are of interest to their members.

HINT: Although manufacturers, suppliers and trade associations may be able to provide some assistance when making waste determinations, they often are only familiar with the federal hazardous waste regulations. They typically are not able to provide reliable information about applicability of the VHWMR or Vermont-listed hazardous wastes ("VT" wastes).

Determining Generator Category

After determining which wastes are hazardous, a business must determine its generator category. Businesses are required to notify Vermont's Hazardous Waste Program of their generator status using the **Site Identification Form 8700-12,** which is available online at: http://dec.vermont.gov/waste-management/hazardous/administrative/epa-site-identification-numbers

The generator status of a facility (i.e., VSQG, SQG or LQG) is determined based on:

1) the total quantity (by weight) of hazardous waste generated at the facility *per month*; and

2) the total amount of hazardous waste accumulated on-site at any given time.

3) amount of acutely hazardous waste generated per month.

Some Key Considerations when Calculating Generator Category:

- Generator category is determined based on the amount of hazardous waste *generated per month*, and not the amount of hazardous waste shipped from a business in a particular month.

- Exempt wastes do *not* count towards generator category (see **Appendix H**).

- *For Vermont-listed hazardous wastes only* ("VT" wastes), a generator can average the amount of that waste generated over a six-month period and use that average value when calculating generator category. This approach is not allowed for federal listed waste.

For example, if a business generates 600 pounds of oily absorbents (VT02) in January, but none in February, March, April, May and June, the generation rate for that waste for the purpose of generator status is 100 pounds per month.

- Any hazardous waste that is reclaimed and subsequently reused on-site only needs to be counted as being generated one time.

- Hazardous wastes generated from an episodic event do not count towards generator category provided the hazardous waste generated from that event is managed in accordance with § 7-312. For more information about episodic events, refer to the *Episodic Events Fact Sheet* that is included as **Appendix F**.

- Because **used oil** and **universal wastes** (i.e., batteries, certain pesticides, mercury thermostats, PCB-containing fluorescent light ballasts, lamps, mercury-containing devices, CRTs, postconsumer paints, and aerosol cans) are exempt, they should not be counted when calculating generator status.

Generator category	**Quantity of acute hazardous waste generated in a calendar month**	**Quantity of non-acute hazardous waste generated in a calendar month**	**Quantity of residues from a cleanup of acute hazardous waste generated in a calendar month**
Very Small Quantity Generator (VSQG)	≤ 1 kg (2.2 pounds)	≤ 100 kg (220 pounds)	≤ 100 kg (220 pounds)
Small Quantity Generator (SQG)	≤ 1 kg (2.2 pounds)	> 100 kg (220 pounds) and < 1,000 kg (2,200 pounds)	≤ 100 kg (220 pounds)
Large Quantity Generator (LQG)	> 1 kg (2.2 pounds)	Any amount	Any amount
	Any amount	≥ 1,000 kg (2,200 pounds)	Any amount
	Any amount	Any amount	> 100 kg (220 pounds)

Appendix I outlines the generation rates and accumulation limits for each generator status category (i.e., VSQG, SQG and LQG), and compares the basic regulatory requirements that apply to each category.

EXAMPLE: A business that generates 100 pounds of oily absorbent (VT02), 25 pounds of spent paint thinner (F003), and 70 pounds of spent naphtha parts washing solvent (D001) in one month generates a total of 195 pounds of hazardous waste in that month (assume that 100 pounds of the VT02 waste is generated each month). When this monthly generation rate is compared to **Appendix I**, the business owner would find that the facility is subject to regulation as a VSQG. However, if more than 2,200 pounds of hazardous waste is accumulated at the facility, the business would be subject to regulation as an SQG because it exceeds the maximum amount that a VSQG can store at any one time.

What Regulations Apply to VSQGs?

VSQGs may accumulate hazardous waste on-site for as long as they choose, provided that they do not exceed generation and accumulation quantity limits identified above. Although VSQGs are exempt from many of the requirements that SQGs and LQGs must meet, VSQGs still must:

1. Complete and submit an up-to-date **Site Identification Form 8700-12**. Upon submitting a completed Site ID form, the generator's site is assigned a permanent identification number (called an EPA ID number). If a business handles hazardous waste at more than one location, a separate Site ID form must be completed for each site.

> Generators can change or update company name, types of waste generated, or generator category, and other facility information in one of two ways:
>
> 1) by completing and submitting to the Agency the Site Identification Form 8700-12, which is available online at: http://dec.vermont.gov/waste-management/hazardous/administrative/epa-site-identification-numbers
>
> 2) by updating their facility's information using EPA's RCRAinfo Industry Application. Learn how to register for a RCRAinfo Industry User account here: https://rcrainfo.epa.gov/rcrainfo-help/application/industryHelp/index.htm#t=UserManagement%2FUG-UserMgmtCreateNewUser.htm
>
> For minor changes such as updating contact information or mailing address, please reach out directly to Wendy Edwards at 802-522-0261 wendy.edwards@vermont.gov.

2. Comply with the generator registration requirements, renew annually, and ensure payment of the registration fee.

3. Comply with the waste management requirements and limits for VSQGs.

4. Conduct hazardous waste operations in a manner that minimizes the possibility of fire, explosion, or release of hazardous waste to the environment. (Although not required, it is recommended that VSQGs periodically inspect hazardous waste containers for leaks.)

5. Manage containers holding hazardous waste as follows:

    - containers must be in good condition and chemically compatible with any waste put in them.
    - containers must remain closed, except when adding or removing waste.
    - container(s) of hazardous waste must be marked with the words "Hazardous Waste" and other words to identify the contents.

- Accumulate and store hazardous waste upon an impervious surface (away from floor drains) and within a structure that sheds rain and snow.

- Prevent hazardous wastes subject to freezing and expansion from freezing by storing waste indoors and in heated structures.

6. As required in **Section 7-105** of the VHWMR, in the event of a hazardous material or waste spill or release to the environment:

   - Take all appropriate immediate actions to protect human health and the environment, to include emergency containment of the spill or release.

   - Immediately report (see reporting information below) any suspected release of a hazardous material that meets the following criteria:
     - A spill of 2 gallons or more.
     - A spill that is less than 2 gallons, but poses an actual threat to human health or the environment (for example, a gallon of gasoline spilled to a wetland); or
     - A spill that exceeds a CERCLA reportable quantity. CERCLA reportable quantities of hazardous substances are listed in 40 CFR Section 302.4: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-J/part-302/section-302.4

   - Any person who has knowledge of a spill and who may be subject to liability for that spill is responsible for reporting the spill. In addition to reporting to the DEC, any spill of hazardous material that impacts (or threatens) surface water (e.g., lakes, streams, wetlands) must also be reported to the U.S. Coast Guard via the National Response Center at 1-800-424-8802.

   - Take any further cleanup actions as required and approved by federal, state, or local officials.

   - If requested by the Waste Management and Prevention Division, submit a written report within ten (10) days following the spill or release.

   See **Appendix G** Hazardous Material Spill Response Fact Sheet for more information.

To report a spill or release, contact the Waste Management and Prevention Division during regular business hours at **(802) 828-1138**, or the Vermont Division of Emergency Management at **(800) 641-5005 (**24 hours/day, seven days/week).

Transporting VSQG Hazardous Waste

A VSQG can **self-transport** their own hazardous waste to an appropriate off-site facility without using a hazardous waste manifest (shipping document), and without meeting permitting requirements for hazardous waste transporters, provided the requirements listed below are met. A VSQG may also self-transport their own hazardous waste to a household hazardous waste collection event according to the requirements listed below, but business waste is not accepted at many of these events. VSQGs should contact their Solid Waste Management Entity before self-transporting to a local collection event.

1. Applicable (federal) Department of Transportation regulations.

2. Applicable regulations of other states through which the waste is transported or to which the waste is delivered.

3. The waste is transported in a vehicle that is owned by the VSQG or an employee of the VSQG.

4. In the event of a discharge of hazardous waste to the environment, the same emergency action and reporting requirements listed above under VSQG requirements apply.

A VSQG may also hire a permitted hazardous waste transporter to transport its waste to an appropriate off-site facility. The list of permitted transporters is also available online. On the following webpage, select the "H" box and click the "filter" button for a list hazardous waste transporters: https://anrweb.vermont.gov/DEC/_DEC/SolidWasteTransporters.aspx

Off-Site Hazardous Waste Disposal Options for VSQGs

VSQGs can manage their own hazardous waste by ensuring delivery of the waste to:

1. A permitted hazardous waste Treatment, Storage or Disposal facility, *via a permitted hazardous waste hauler*.

2. A certified solid waste management facility allowed to accept such waste under the terms of its certification.

3. A facility that beneficially uses or reuses or legitimately recycles or reclaims its waste or treats its waste prior to beneficial use or reuse, or legitimate recycling or reclamation.

4. An off-site small or large quantity generator located in Vermont that is under the control of the same person that is in control of the VSQG site provided:
    - The off-site generator is a small or large quantity generator.
    - The off-site generator has notified the Hazardous Waste Program that it is accepting hazardous waste from the VSQG using the **Site Identification Form** 8700-12.

- The hazardous waste delivered to the off-site generator counts toward the generator category of the off-site generator.
- The VSQG marks its container(s) of hazardous waste with the words "Hazardous Waste" and an indication of the hazards of the contents.

5. A collection event, authorized by the Waste Management and Prevention Division to accept VSQG waste (e.g., events sponsored by Vermont Solid Waste Management Entities). A list of Vermont's Solid Waste Management Entities is included as **Appendix J** of this Guidebook; a current list is available online at: http://dec.vermont.gov/waste-management/solid/local-districts

6. For universal waste, a universal waste handler or destination facility.

8. For airbag waste, an airbag waste collection facility, or a designated facility.

9. A facility that otherwise treats, stores, or disposes of the waste provided the VSQG has submitted a written request for an alternative handling method to the Hazardous Waste Program and received written approval stating that it was determined that the proposed handling method will not have an adverse impact on human health and the environment.

Note: A VSQG experiencing an episodic event may generate and accumulate hazardous waste. Additional information on episodic events can be found in **Appendix F**.

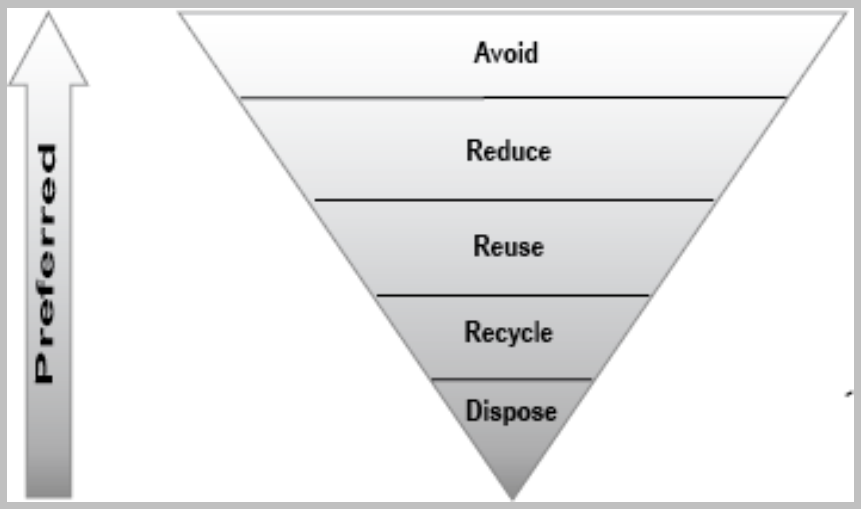
If a VSQG chooses to utilize a manifest, he or she must comply with all applicable manifest instructions. The webpage dedicated to hazardous waste manifests can be found here: https://dec.vermont.gov/waste-management/hazardous/administrative.

It Makes Sense to Generate Less Hazardous Waste

Businesses can save money and lessen their regulatory obligations by reducing the amount of waste that they generate. In the United States, billions of dollars are spent each year managing hazardous wastes and cleaning up contamination that results from the mismanagement of hazardous materials. By decreasing the amount and toxicity of the waste that is generated and reusing or recycling waste, when possible, businesses can realize the immediate benefit of decreased waste management costs and environmental liability, while at the same time doing their part to minimize public and private expenditures for environmental cleanup.

Please consider the waste management hierarchy when making decisions about how to manage hazardous waste (most desirable to least desirable):

Waste Management Hierarchy:



Avoid using toxic materials or hazardous materials, when possible, to reduce waste generation.

- Look for alternative products with less hazardous constituents.
- Keep track of materials that may expire; keep an inventory of products.

Reduce excess materials and excess consumption, when possible.

- Ensure product and waste container lids and caps are closed between uses to reduce chance of evaporation, spills, and drips.
- Train employees to measure out the quantity of material needed to complete a job.
- Take measures to minimize the amount of overspray in coating operations.
- Manage hazardous and non-hazardous wastes separately. If hazardous waste is mixed with non-hazardous waste, the combined waste is usually considered hazardous.

Reuse materials as many times, and in as many ways, as possible.

- Use absorbent clean-up materials until they are fully saturated.
- Improve housekeeping methods. For processes that utilize dip tanks or automated spray equipment, arrange equipment so that the fluids/coatings drains/drips are captured for reuse.
- Reuse solvent waste from one process in another operation where solvent quality is less critical such as parts washing.
- Used gearbox and hydraulic oils can be used to lubricate chains and conveyors.

Recycle hazardous wastes by processing (either on-site or offsite) to reclaim spent materials**.**

- Recycle antifreeze by filtration and/or reconditioning
- Recycle solvent waste by filtration or distillation.

Dispose of hazardous wastes appropriately when none of the above options are available.

Note: Any activity that involves changing the physical, chemical, or biological character or composition of a hazardous waste to neutralize the waste, recover energy or material resources, or render it safer for transport, recovery, or storage, reduce the volume, or render it non-hazardous is considered generator treatment for which notification is required. The Generator Treatment Notification form can be found here:
http://dec.vermont.gov/sites/dec/files/wmp/HazWaste/Documents/Forms/GenTreatmentForm.pdf

VERMONT

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APPENDIX A

HAZARDOUS WASTE CODES COMMONLY USED BY VSQGS:

Subchapter 2 of the Vermont Hazardous Waste Management Regulations (VHWMR) identifies all of the wastes that are regulated as hazardous wastes in Vermont.

"F-Listed" Hazardous Wastes: *refer to the VHWMR Section 7-210 for the complete list of wastes from non-specific sources.*

F001 The following spent halogenated solvents used in degreasing: Tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1- trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons. Also, still bottoms from these spent solvents and solvent mixtures.

F002 The following spent halogenated solvents: Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoro-ethane, orthodichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane. Also, still bottoms from these spent solvents and solvent mixtures.

F003 The following spent non-halogenated solvents: Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol. Also still bottoms from these spent solvents and solvent mixtures.

F005 The following spent non-halogenated solvents: Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, and 2-nitropropane. Also, still bottoms from these spent solvents and solvent mixtures.

F006 Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc, and aluminum plating of carbon steel; and (6) chemical etching and milling of aluminum.

F007 through **F012** Various plating wastes where cyanides are used.

F032 Wastewaters, process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that currently use or have previously used chlorophenolic formulations (unless the generator meets all requirements of 40 CFR Section 261.35).

F034 Wastewaters, process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that use creosote formulations.

F035 Wastewaters, process residuals, preservative drippage, and spent formulations from wood preserving generated at plants that use inorganic preservatives containing arsenic or chromium.

"VT-Listed" Hazardous Wastes:

VT01 Waste containing PCBs in concentrations equal to or greater than 50 parts per million.

VT02 Waste containing greater than 5% by weight of petroleum distillates with melting points of less than 100°F, including but not limited to kerosene, fuel oil, hydraulic oils, lubricating oils, penetrating oils, tramp oils, quenching oils, and crankcase and automotive oils.

VT03 Waste water-miscible metal cutting and grinding fluid.

VT06 Pesticidal wastes of products classified under FIFRA as restricted use pesticides not specifically listed in subchapter 2 (of the Regulations).

VT08 Waste ethylene glycol and solutions containing greater than 700 parts per million (ppm) of ethylene glycol (e.g., coolants, antifreeze).

VT11 Wastes determined to be hazardous pursuant to § 7-216.

VT20 A solid material that when mixed with an equal weight of distilled water causes the liquid fraction of the mixture to exhibit the properties of the corrosivity characteristic as specified in § 7-206(a)(3) of the Regulations.

VT21 Liquid wastes containing perfluorooctanoic acid (PFOA) in concentrations equal to or greater than 20 parts per trillion.

VT22 Liquid wastes containing perfluorooctanesulfonic acid (PFOS) in concentrations equal to or greater than 20 parts per trillion.

VT99 Non-hazardous waste. This code is to be used only for non- hazardous waste shipped using a hazardous waste manifest.

Characteristic Hazardous Wastes: *refer to the VHWMR Sections 7-205 through 7-208 for complete descriptions of each hazardous waste characteristic.*

D001 (Ignitable waste): Liquid with a flash point of less than ~140° F; or is not a liquid and is capable under standard temperature and pressure of causing fire and creating a

burning hazard; or is an ignitable compressed gas; or is an oxidizer (the chemical names of oxidizers often have “per” as a prefix, “ate” as a suffix, or include “oxide”).

D002 (Corrosive waste): Liquid with a pH $<$ 2 or ≥ 12.5; or that corrodes steel at a rate greater than ¼ inch/year.

D003 (Reactive waste): Waste that is unstable; reacts violently with water; can generate toxic gases; or is capable of detonation.

D004 through D043 (Toxicity Characteristic wastes): Wastes that when analyzed using the "Toxicity Characteristic Leaching Procedure” (TCLP) are found to contain any of the following contaminants at concentrations (in milligrams per liter) greater than or equal to the value identified in parentheses.

D004 - Arsenic (5.0 mg/l)
D005 - Barium (100.0 mg/l)
D006 - Cadmium (1.0 mg/l)
D007 - Chromium (5.0 mg/l)
D008 - Lead (5.0 mg/l)
D009 - Mercury (0.2 mg/l)
D011 - Silver (5.0 mg/l)
D018 - Benzene (0.5 mg/l)
D019 - Carbon tetrachloride (0.5 mg/l)
D022 - Chloroform (6.0 mg/l)
D023 through **D026** - Cresols (200 mg/l)
D035 - Methyl ethyl ketone (200.0 mg/l)
D037 - Pentachlorophenol (100.0 mg/l)
D039 - Tetrachloroethylene (0.7 mg/l)
D040 - Trichloroethylene (0.5 mg/l)
D043 - Vinyl Chloride (0.2 mg/l)

APPENDIX B

REGULATED WASTES FROM COMMON SMALL BUSINESS ACTIVITIES

AUTO BODY SHOPS:

- waste paint, solvents, spray booth filters, solvent still bottoms, and overspray

DENTAL OFFICES:

- silver-bearing x-ray wastes
- dental amalgams

DRY-CLEANING:

- perchloroethylene still bottoms, filters, and lint
- separator water
- petroleum solvent still bottoms, filters, and lint

EDUCATIONAL INSTITUTIONS:

- silver-bearing darkroom wastes
- outdated laboratory chemicals
- laboratory wastes
- waste paints and paint solvents
- parts washing solvents and degreasers
- waste oil, oily absorbents, unused pesticides
- fluorescent lamps, computer monitors

FURNITURE / WOOD PRODUCTS MANUFACTURE:

- wood finishing wastes (stains, paints, penetrating oils, and solvent-based coatings)
- machine maintenance wastes (waste oils, oily absorbents)
- spray booth wastes
- waste resin and glue

LABORATORIES:

- spent solvents
- acids and bases
- chemical laboratory waste
- unused reagents & outdated chemicals
- contaminated absorbents
- test samples

LOGGING / SAWMILLS:

- oily wastes
- waste hydraulic fluid and contaminated debris
- wood preserving wastes (pentachlorophenol, creosote, and arsenic solutions)

METAL FABRICATION / METAL FINISHING:

- cutting oils, water-based coolants
- parts washing solvents and degreasers
- waste paints and thinners, still bottoms
- waste plating solutions
- corrosive (acid or alkaline) wastes
- sludge and swarf

PRINTING / PHOTO PROCESSING:

- some waste inks and clean-up materials
- press cleaning solvents and solutions
- waste oils and oily absorbents
- plate making chemicals

VEHICLE MAINTENANCE:

- spent parts washing / degreasing solvent
- spent antifreeze
- used oil, oil filters, oily absorbents
- waste fuel and fuel filters
- lead acid batteries

APPENDIX C

USED OIL MANAGEMENT FACT SHEET
(BEGINS ON NEXT PAGE)

HAZARDOUS WASTE PROGRAM ENVIRONMENTAL FACT SHEET

Used Oil

What is used oil and how is it regulated?

Used oil is defined as any oil that has been refined from crude oil or any synthetic oil which has been used and then contaminated by physical or chemical impurities. To be defined and managed as used oil, the oil must become contaminated as a result of being used. Used oil is a free-flowing liquid at standard temperature and pressure and has a flash point greater than 100 degrees (F).

The term "used oil" does not include materials refined from crude oil that are fuels (e.g., gasoline, jet fuel, and diesel fuel) or materials used as cleaning agents or solvents (e.g., naphtha or mineral spirits). Used oils include:

- vehicle crankcase oils, transmission fluids, and power steering fluids.
- hydraulic, compressor, and straight cutting oils.
- tramp oil and oil drained from evaporators.

Used oil is regulated under the Used Oil Management Standards of Subchapter 8 of the Vermont Hazardous Waste Management Regulations (VHWMR). Do-it-yourselfers who produce used oil are exempt from the VHWMR and Subchapter 8 standards.

What *can* be done with used oil?

- Send it off site to be fuel-blended and burned for energy recovery ***or*** re-refined for reuse as a lubricant.
- Reuse it to lubricate chains, tools, and other machinery; do not let it drip on the ground.
- Burn it on site in used-oil space heating equipment *(refer to the "Burning Used Oil Fuel" fact sheet for more information),* give it away, or sell it as used oil fuel.
- Check with the Solid Waste District in your area to see if they have a collection program for small businesses.

What *cannot* be done with used oil?

- Used oil cannot be disposed of in a Vermont solid waste landfill.
- Used oil cannot be applied to roads for dust control.
- Used oil cannot be mixed with a hazardous waste, with the exception that used oil may be mixed with a waste that is hazardous only because it exhibits the characteristic of ignitability (e.g., ignitable-only mineral spirits), provided the resultant mixture is not ignitable.
- Used oil cannot be used for firefighter training.
- Used oil cannot be released into the surface or groundwater or onto the land of the state.

How can used oil be stored?

Used oil may be stored in containers that are:

- in good condition and made of or lined with compatible material.

- kept closed, except when adding or removing the used oil.
- labeled with the words "Used Oil".
- located on an impervious surface (e.g., concrete).
- within a structure that sheds rain and snow.

Used oil may be stored in aboveground tanks that are:

- installed and operated in accordance with Vermont Aboveground Tank Rules: (https://dec.vermont.gov/waste-management/storage-tanks).
- clearly marked with the words "Used Oil" or "Used Oil Fuel".
- managed in a manner to prevent a release to the environment.
- If managed in tanks located outdoors, the tanks must be equipped with secondary containment capable of holding the contents of the tank.

Note: A permit is required to store used oil in an underground storage tank (UST). Contact Vermont's UST Program at (802) 828-1138 for assistance.

How Can Used Oil be Transported?

Used oil generators can self-transport their own used oil without obtaining a transporter permit provided:

- no more than 55 gallons are transported at any one time to a used oil collection facility or to an aggregation point.
- containers meet the Department of Transportation (DOT) standards.
- used oil is transported in a vehicle owned by the generator or an employee.

Additionally, used oil generators who provide used oil or used oil fuel to an off-site facility shall retain records which document the amount of used oil or used oil fuel provided, the date of each shipment, and the name, address, and telephone number of the facility to which the used oil or used oil fuel was provided for a period of three years.

To transport more than 55 gallons of used oil at one time, contact the Waste Management & Prevention Division to obtain either a list of permitted hazardous waste transporters or a hazardous waste transporter permit application. Below is the link for more information: https://dec.vermont.gov/sites/dec/files/wmp/SolidWaste/Documents/Permit%20Brochure%20for%20ANR%20Online.pdf

What else do I need to know?

Notification: Facilities that generate used oil, but don't generate any hazardous waste and don't accept used oil from off site, are not required to notify. Most facilities that manage used oil do, however, generate some hazardous waste (e.g., oily sorbent or debris) and therefore must notify the

Waste Management & Prevention Division of its hazardous waste activity using the **Hazardous Waste Handler Site ID Form** (EPA form 8700-12):
https://dec.vermont.gov/sites/dec/files/wmp/HazWaste/Documents/Forms/EPAFORM8700-12Form.pdf

Note: Facilities that accept used oil from off site or burn used oil must notify as a used oil collection facility.

Hazardous Waste Generator Category: Facilities that generate both used oil and hazardous waste should *not* count the volume of used oil generated when calculating their hazardous waste generator category (based on the amount of hazardous waste generated each month). If a business *chooses* to manage used oil as hazardous waste (i.e., under the VT02 hazardous waste code), then the business must count that waste toward its generator category.

Hazardous Waste Manifest: A hazardous waste manifest shipping document *is not required* when transporting used oil from any generator category (very small quantity, small quantity, or large quantity). If a business *chooses* to ship used oil using a manifest, or if a hired transporter requires the use of one, the used oil should be identified on the manifest using the VT99 code for non-hazardous waste. Additionally, if a business *chooses* to manage used oil as hazardous waste, those registered as a small or large quantity generator must ship the used oil under the VT02 hazardous waste code on a manifest. However, a very small quantity generator is not required to ship hazardous waste on a manifest.

Federal Planning Requirements: The U.S. EPA requires a Spill Prevention, Control, and Countermeasure (SPCC) plan for any facility that has above-ground petroleum storage capacity exceeding 1,320 gallons *(refer to the "SPCC" fact sheet for more information)*.

For more information regarding used oil, or if you have other hazardous waste management questions, please contact:

Hazardous Waste Program
Waste Management and Prevention Division
Vermont Department of Environmental Conservation
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
802-828-1138
https://dec.vermont.gov/waste-management/hazardous

APPENDIX D

BURNING USED OIL FUEL FACT SHEET
(BEGINS ON NEXT PAGE)

HAZARDOUS WASTE PROGRAM ENVIRONMENTAL FACT SHEET

Used Oil Burning

Used oil may be burned as fuel in Vermont, provided certain requirements are met. These requirements include labelling containers of the used oil to be burned with the words "Used Oil Fuel", basic testing requirements to determine if the oil is appropriate for burning, and other container management standards summarized in the "Used Oil" fact sheet and found in Section 7-806 of the Vermont Hazardous Waste Management Regulations (VHWMR).

This fact sheet summarizes the requirements applicable to burning *"specification"* used oil fuel in *"small fuel burning equipment"* (i.e., equipment that has been designed specifically for burning used oil fuel), an activity that is exempt from Vermont's Air Pollution Control Regulations (APCR). Burning used oil fuel in larger equipment, or burning off-specification used oil, is subject to regulation under the APCR and more stringent VHWMR requirements.

What is specification used oil fuel?

Used oil that has met the specifications identified by Table 1 may be burned in small fuel burning equipment, such as space heaters. Off-specification used oil (oil that exceeds one or more of the Table 1 specifications) may only be burned for energy recovery in industrial furnaces, boilers, or hazardous waste incinerators and is subject to the APCR. Off-specification oil may also be managed as a hazardous waste or sent off site for recycling (e.g., re-refining).

Table 1 – Used Oil Fuel Specifications

Constituent/Property	Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Flash Point	100°F minimum
Total Halogens	1,000 ppm maximum
PCBs	< 2 ppm maximum
Net Heat of Combustion	8,000 BTU/lb. minimum

What is small fuel burning equipment and how is it regulated?

It is space-heating equipment defined as having a maximum operating heat input equal to or less than 500,000 BTU/hour (e.g., space heaters).

Burning used oil fuel in this type of space heating equipment is allowed provided:

- Combustion gases are vented to ambient (outdoor) air.
- Stacks are not equipped with devices that would impede the upward discharge of the exhaust gases (i.e., no vent pipe rain caps).

Can any type of used oil be burned in small fuel burning equipment?

No. The types of used oil that may be burned in small fuel burning equipment are limited to vehicle crankcase, transmission fluid, hydraulic oil, and machine gearbox oil that meet the Table 1 specifications. Other types of used oil (e.g., compressor oil, power steering fluid, metal working fluids) may be burned as fuel with approval from the Waste Management & Prevention Division. Approval is based on the product information provided on the safety data sheet (SDS), as well as a description of the process generating the used oil.

Does used oil fuel need to be tested for all the Table 1 constituents?

Facilities that either burn their own used oil on site or burn used oil received from off site in shipments of less than or equal to 55-gallons:

- Must initially test the used oil (from each source) for total halogens, prior to accepting it. A field screening test kit may be used to determine if the 1,000-ppm specification limit is met for total halogens. Contact the Waste Management & Prevention Division for information about field screening test kits and how to obtain them.
- If there is reason to believe that any of the remaining Table 1 specifications (i.e., those other than total halogens) would not be met by a volume of used oil, then that oil must be tested for the suspected constituents or properties.

Facilities that receive used oil fuel in shipments greater than 55-gallons:

- Must initially test the used oil fuel to establish that all the Table 1 specifications have been met; this testing may be conducted by either the used oil generator or used oil burner.

How often do I have to test used oil fuel?

Used oil fuel from a specific source must be tested one time, prior to burning. The oil must be retested only if there is reason to believe that the quality of the oil, or the process generating the oil, has changed, such that the Table 1 specifications would not be met. A burner does not need to test used oil fuel received from offsite if the oil has already been tested by the generator (or transporter) and found to meet Table 1 specifications.

Do I need a permit (or to provide notification) to burn used oil fuel in small fuel burning equipment?

No permit is required to burn specification used oil fuel. Moreover, those facilities that burn specification used oil fuel and do not generate any hazardous waste (e.g., oily absorbents or oily debris) are not required to notify as a hazardous waste generator with the Waste Management & Prevention Division.

Can I burn used oil fuel that I did not generate?

Yes. In addition to burning used oil fuel that is generated on site, burners may accept used oil fuel from:

- Do-it-yourselfers (households that generate used oil).
- Off-site facilities that are owned and operated by the burner.
- Other businesses and municipalities.

Can used oil fuel be transported by either the burner or the generator?

Yes. A permit or certification is not required under the VHWMR to transport used oil fuel by a generator or a burner, provided that no more than 55-gallons is transported at any one time. However, in all cases, the transportation of used oil fuel must be in accordance with applicable DOT (Department of Transportation) requirements, including those for placarding.

What records must be maintained?

When used oil fuel is received from other businesses or municipalities, the burner must retain records for three years which document the:

- Quantity of used oil fuel accepted.
- Specification testing results.
- Name, address, and telephone number of the facility from which used oil fuel is accepted.

Note: When used oil fuel is only generated on site (or received from do-it-yourselfers), the burner need only retain specification testing results.

For more information regarding used oil burning, or if you have other hazardous waste management questions, please contact:

Hazardous Waste Program
Waste Management and Prevention Division
Vermont Department of Environmental Conservation
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
802-828-1138
https://dec.vermont.gov/waste-management/hazardous

APPENDIX E

UNIVERSAL WASTE MANAGEMENT FACT SHEET
(BEGINS ON NEXT PAGE)

HAZARDOUS WASTE PROGRAM ENVIRONMENTAL FACT SHEET

Universal Waste

What is Universal Waste?

A universal waste meets hazardous waste criteria but may be managed under alternative standards, because it poses a low risk relative to other hazardous wastes and is generated by a wide variety of businesses.

Although universal wastes are managed under alternative standards from the hazardous waste regulations of Subchapters 1 through 7 of the Vermont Hazardous Waste Management Regulations (VHWMR), they must be managed according to the Subchapter 9 Universal Waste Management Standards. Wastes that can be managed as universal waste in Vermont include **certain batteries, pesticides, thermostats, PCB-containing fluorescent light ballasts, lamps** (e.g., fluorescent bulbs)**, mercury-containing devices** (e.g., mercury switches), **cathode ray tubes** (e.g., color computer monitors and TV screens), **postconsumer paint**, and **aerosol cans** that would otherwise have to be managed as hazardous waste.

The Universal Waste Management Standards include requirements that apply to small and large quantity "handlers" of universal waste (including specific management standards for each category of universal waste), "universal waste transporters," and "destination facilities." However, since most of the Vermont businesses that manage universal waste fall into the "small quantity handler" category, this fact sheet focuses primarily on those requirements.

What is a Small Quantity Handler?

A "**universal waste handler**" is defined as:

1) *A generator of universal waste; or*
2) *The owner or operator of a facility, including all contiguous property, that receives universal waste from other universal waste handlers, accumulates universal waste, and sends universal waste to another universal waste handler, to a destination facility, or to a foreign destination.*

A "**small quantity handler**" is defined as:

> *A universal waste handler who accumulates less than 5,000 kilograms (11,000 pounds) total of universal waste other than CRTs (batteries, pesticides, thermostats, ballasts, lamps, or mercury-containing devices, postconsumer paint, or aerosol cans, calculated collectively), and who accumulates less than 36,288 kilograms (40 tons) of CRTs, at any time.*

What does a Small Quantity Handler need to comply with?

Although ***each category of universal waste has unique waste management requirements*** (individual fact sheets are available for lamps, mercury-containing devices, and CRTs), small quantity handlers must manage all universal wastes according to the following general requirements:

- Manage universal wastes in a way that prevents breakage and releases to the environment.

- Keep containers of universal waste closed.
- Immediately contain and transfer any universal wastes that show evidence of leakage or damage to an appropriate container.
- Meet waste-specific container or packaging requirements.
- Protect containers of universal waste from precipitation.
- Label or mark the universal waste (or container holding the universal waste) to indicate that it is a waste or universal waste. For example, universal waste lamps should be marked as "Universal Waste Lamps," "Waste Lamps," or "Used Lamps."
- Accumulate universal waste for no longer than one year (a handler must be able to demonstrate the length of time that a universal waste has been accumulated from the date it became a waste or is received).
- Ensure that employees handling universal waste are familiar with proper handling and emergency procedures, relative to their responsibilities.
- In the event of a release of universal waste, comply with the emergency actions and reporting requirements of VHWMR Section 7-105(a), and determine if any material resulting from the release is hazardous waste.

Where can Small Quantity Handlers bring Universal Waste?

Small quantity handlers can bring their universal wastes to another universal waste handler or a destination facility (which, in general, is defined as *a facility that treats, disposes of, or recycles a particular category of universal waste*). Small quantity handlers may also send universal waste to a foreign destination provided the specific export requirements of VHWMR Section 7-912(k) are met.

Who can Transport Universal Waste?

Small quantity handlers can either self-transport their own universal waste or hire a commercial transporter. Anyone that transports universal waste must comply with applicable Department of Transportation (DOT) requirements and, if using a vehicle with a gross vehicle weight greater than one ton, with the solid waste permit requirements of 10 V.S.A. § 6607a. No hazardous waste manifest shipping document is required for the transport of universal waste.

For more information regarding universal waste, or if you have other hazardous waste management questions, please contact:

Hazardous Waste Program
Waste Management and Prevention Division
Vermont Department of Environmental Conservation
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
802-828-1138
https://dec.vermont.gov/waste-management/hazardous

APPENDIX F

EPISODIC EVENT FACT SHEET
(BEGINS ON NEXT PAGE)

HAZARDOUS WASTE PROGRAM ENVIRONMENTAL FACT SHEET

Episodic Events

What is an Episodic Event?

An **"Episodic Event"** is an activity (or activities) that does not normally occur during operations causing the generator to create more waste, which could cause the generator to exceed the quantity limits for their current generator category. These events can either be **planned** (ex: regular maintenance, tank cleanouts, short-term projects, or removal of excess chemical inventory) or **unplanned** (including production errors, product recalls, accidental spills, fires, or "acts of nature," such as a tornado, hurricane, or flood).

Note: Episodic Events only apply to very small quantity generators (VSQGs) and small quantity generators (SQGs). Episodic Events do not apply to large quantity generators (LQGs) or household hazardous waste.

Do I have to be a hazardous waste generator to have an episodic event?

The Vermont Hazardous Waste Program may issue a temporary identification number to persons who have generated non-household hazardous waste only from an episodic event and are not otherwise notified as hazardous waste handlers.

Will an Episodic Event affect my waste generation rate?

No. If managed properly (see next question), wastes generated during episodic events do not affect generation rates.

What do I need to do for an Episodic Event?

Very small quantity generators and small quantity generators must:

- Notify the Vermont Hazardous Waste Program thirty (30) days prior to a planned episodic event and within 72 hours of an unplanned event using the Hazardous Waste Handler Site Identification Form (EPA Form 8700-12).
- Manage hazardous waste from an episodic event in a manner that minimizes the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to the air, soil, or water.
- Store hazardous waste from the episodic event in containers that are in good condition, compatible with the waste, and keep containers closed except to add or remove waste.
- Clearly label containers from the episodic event with the words "Episodic Hazardous Waste", the hazards of the contents (via pictogram, statement, or placard), and the date upon which the episodic event began.
- Manifest and ship hazardous waste generated from an episodic event off site to a designated facility or treat on site in accordance with the conditions of **§ 7-502(o)**.
- Maintain the following records for three (3) years from the end date of the episodic event:
    - Beginning and end dates of the episodic event.
    - A description of the episodic event.

- A description of the types and quantities of hazardous waste generated during the event.
- A description of how the hazardous waste was managed, as well as the name of the RCRA-designated facility that received the hazardous waste.
- Name(s) of hazardous waste transporters; and
- An approval letter from the Hazardous Waste Program if the generator petitioned to conduct one additional episodic event per calendar year.
- Within sixty (60) days from the start of the episodic event, hazardous wastes generated from the episodic event must be sent to a designated facility, complying with manifest requirements of § 7-702.

Please see **§ 7-312 MANAGING HAZARDOUS WASTE FROM AN EPISODIC EVENT** in Subchapter 3 of our regulations.

What do I do if I have more than one Episodic Event per year?

If a very small quantity generator or small quantity generator has already held an **unplanned** episodic event in a calendar year, it may petition the Hazardous Waste Program for an additional **planned** episodic event in that same calendar year. Additionally, if a very small quantity generator or small quantity generator has already held a **planned** episodic event in a calendar year, the generator may petition the Secretary for an additional **unplanned** episodic event in that calendar year within 72 hours of the unplanned event.

The petition must include the following:

- The reason(s) why an additional episodic event is needed and the nature of the episodic event.
- The estimated amount of hazardous waste to be managed from the event.
- How the hazardous waste is to be managed.
- The estimated length of time needed to complete management of the hazardous waste generated from the episodic event—not to exceed sixty (60) days; and
- Information regarding the previous episodic event managed by the generator, including the nature of the event, whether it was a planned or unplanned event, and how the generator complied with the conditions.

Note: The petition must be made to the Vermont Hazardous Waste Program in writing, either on paper or electronically.

Are there any additional requirements for storing hazardous waste from an Episodic Event in tanks?

Yes, a very small quantity generator or small quantity generator must:

- Ensure tanks are in good condition and compatible with the hazardous waste stored therein.
- Clearly label tanks from the episodic event with the words “Episodic Hazardous Waste”, the hazards of the contents (via pictogram, statement, or placard), and the date upon which the episodic event began.
- Ensure tanks have overflow prevention (e.g., be equipped with a means to stop inflow with systems such as a waste feed cutoff system or bypass system to a standby tank when hazardous

waste is continuously fed into the tank).

- Inspect tanks at least once each operating day to ensure all applicable discharge control equipment, such as waste feed cutoff systems, bypass systems, and drainage systems, are in good working order and to ensure the tank is operated according to its design by reviewing the data gathered from monitoring equipment, such as pressure and temperature gauges, from the inspection; and
- Maintain inventory logs, monitoring equipment or other records to identify the date where each period of accumulation begins and ends. These inventory records must be kept on site and available for inspection.

For more information regarding episodic events or if you have other hazardous waste management questions, please contact:

Hazardous Waste Program
Waste Management and Prevention Division
Vermont Department of Environmental Conservation
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
802-828-1138
https://dec.vermont.gov/waste-management/hazardous

APPENDIX G

HAZARDOUS MATERIAL SPILL RESPONSE FACT SHEET
(BEGINS ON NEXT PAGE)

HAZARDOUS WASTE PROGRAM ENVIRONMENTAL FACT SHEET

Hazardous Material Spill Response

This fact sheet applies to any Vermont business or municipality that handles hazardous material (including hazardous waste, petroleum products, or CERCLA hazardous substances), and consequently may need to respond to and report a release of hazardous material (spill) to the environment. It summarizes the spill response and notification requirements included under **Section 7-105** in the Vermont Hazardous Waste Management Regulations (VHWMR) and **Section 35-102** in the Investigation and Remediation of Contaminated Properties Rule and describes response procedures for releases of hazardous materials.

How do I respond to a spill?

1. Assess the Hazard and Perform Initial Response (if appropriate)

For spills that can be safely managed without assistance:

- Stop the release at its source.
- Prevent spilled material from entering storm drains, waterways, drainage ditches, etc.; and
- Contain spilled material using a barrier (absorbent pads or socks), temporary dike or trench.

For all other spills, a cleanup contractor will likely need to be hired since they have the training and equipment necessary to safely respond to dangerous hazardous material spills. A list of spill cleanup contractors that operate in Vermont is maintained online at: http://dec.vermont.gov/waste-management/spills

2. Report the Spill

Any hazardous material spill to the land or water that meets the criteria listed below must be immediately reported to the Department of Environmental Conservation (DEC) Spill Response Team (spill team) by calling the **24-hour Hazardous Materials Spills Hotline at 1-800-641-5005 or (802) 828-1138 during regular business hours (M-F 7:45 am - 4:30 pm EST)**. *If there is any question about whether a spill is reportable, call.*

- A spill of 2 gallons or more.
- A spill that is less than 2 gallons, but poses an actual threat to human health or the environment (for example, a gallon of gasoline spilled to a wetland); or
- A spill that exceeds a CERCLA reportable quantity. CERCLA reportable quantities of hazardous substances are listed in 40 CFR Section 302.4: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-J/part-302/section-302.4

Any person who has knowledge of a spill and who may be subject to liability for that spill is responsible for reporting the spill. In addition to reporting to the DEC, any spill of hazardous material that impacts (or threatens) surface water (e.g., lakes, streams, wetlands) must also be reported to the U.S. Coast Guard via the National Response Center at **1-800-424-8802**.

3. Clean up and follow up

Any business or municipality who may be responsible for a spill must:

- Ensure that the spill is cleaned up to the extent that it no longer presents a threat to human health or the environment.
- Make a hazardous waste determination for all spill cleanup materials.
- Ensure that contaminated soil/water/debris is collected and managed appropriately; and
- **For any reportable spill, a written follow-up report must be submitted within 10 days detailing how the spill was cleaned up and how associated waste was managed.**

What happens when a spill is reported to the DEC?

When a spill is reported to the DEC, a spill team member will determine if on-site assistance is needed to assess environmental impact and/or oversee cleanup efforts. The spill team member can provide assistance related to spill containment and cleanup, and the proper management of cleanup materials. The DEC's spill team can also assist with obtaining information about the hazards associated with the spilled materials, contacting other individuals with potential cleanup obligations, and, if needed, hiring a cleanup contractor.

It is important to report spills immediately so that the DEC can quickly assess the potential for environmental impact and coordinate outside assistance as necessary. Any details that can be provided about the estimated amount of material spilled material, or the location of the release can be helpful to complete that assessment. Delays in reporting can result in greater environmental impacts and a more complicated and costly cleanups.

What happens when a hazardous material spill occurs during transportation?

The owner or operator of the vehicle from which the material has been released has the primary obligation of reporting and cleaning-up a hazardous materials spill that occurs during transportation. This person should stop the vehicle, report the incident, and try to contain the spill. They should remain at the scene of the release, and not drive away. Although the responsibility lies with the vehicle owner or operator, transportation related spills typically are reported to the DEC by the emergency responder (fire chief or police officer) who first arrives at the spill scene.

While transportation-related spills are subject to the same reporting requirements as those that occur at fixed facilities, any transportation-related spill that meets the criteria of a "Reportable Incident" specified in Section 171.15 of 49 CFR (the federal Department of Transportation regulations) must also be reported to the National Response Center at 1-800-424-8802. Examples of Reportable Incidents include a death or injury requiring hospitalization; closure of a major transportation artery or facility for more than one hour; and evacuation of the public for more than one hour.

An incident commander (in most cases, the local fire chief) is usually designated to oversee the spill response effort in consultation with the DEC spill team. The responsible party(ies) may also be involved in the cleanup depending on their willingness and/or ability. Any follow-up to the initial spill response

shall be coordinated with the DEC's spill team.

What are some best management practices for spill prevention and emergency preparedness?

- Develop a spill prevention plan; involve employees so they know how and why spills occur.
- When transferring liquids, use drip trays, funnels, or other means to avoid spills.
- Use spring-loaded drum covers, valves or other positive shut-off devices.
- Ensure that all containers are closed when not adding or removing material and protected from precipitation and freezing (if subject to freezing).
- Store all containers on an impervious surface (such as concrete) that is protected from weather.
- Instruct employees in spill response procedures. Include basic safety precautions like:
    - Minimize contact with or walking in spilled material
    - Minimize inhalation of any gases, vapors or smoke that result from a spill
    - Promptly wash any skin that comes in contact with spilled material
- Post a list of emergency numbers near phones or in vehicles.
- Maintain spill control and containment equipment in designated areas.

For more information regarding hazardous material spill response, or if you have other hazardous waste management questions, please contact:

Hazardous Waste Program
Waste Management and Prevention Division
Vermont Department of Environmental Conservation
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
802-828-1138
https://dec.vermont.gov/waste-management/hazardous

APPENDIX H
COMMONLY USED EXEMPTIONS:

Note: The following exemptions were identified by Vermont's Hazardous Waste Program staff as those most relevant to very small quantity generators (VSQGs). For a complete list of exemptions, refer to sections 7-203 and 7-204 in subchapter 2 of the Vermont Hazardous Waste Management Regulations.

§ 7-203 CONDITIONAL EXEMPTIONS

The following wastes are exempted from the provisions of these regulations:

(j) Containers and inner liners from containers of hazardous waste provided that the containers and inner liners are empty. Containers and inner liners are empty under the following conditions:

(1) For those containers or inner liners which have held hazardous waste, when all material has been removed using the practices commonly employed to remove materials from that type of container, and

(A) No more than one inch of residue remains on the bottom of the container or inner liner; and
(B) No more than 3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 119 gallons in size; or
(C) No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gallons in size.

(2) For those containers that held a hazardous waste that is a compressed gas, when the pressure in the container approaches atmospheric pressure.

(3) For those containers or inner liners which have held acutely hazardous waste, pesticidal waste, or obsolete pesticide products:

(A) When the container or inner liner has been triple-rinsed with a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate.
(B) When the container or inner liner is cleaned by a method which the generator has demonstrated to achieve equivalent removal; or
(C) In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container has been removed.

(4) For containers of hazardous waste pharmaceuticals, when such containers are managed in accordance with the requirements of § 7-1008 for determining when they are considered empty.

(l) Water-miscible metal cutting and grinding fluid waste that does not exhibit a characteristic of hazardous waste as defined in **§§ 7-205 through 7-208** provided:

(1) It is recycled or treated on-site (e.g., centrifugation, evaporation of aqueous component, filtration and ultrafiltration) in accordance with § 7-502(o) or sent off-site for treatment; and

Note: Evaporation equipment must be operated in accordance with Vermont's Air Pollution Control Regulations.

(2) Containers and/or tanks holding water-miscible metal cutting and grinding fluid are:

(A) Marked with words that identify the contents;
(B) Kept closed except to add or remove spent material;
(C) In good condition (i.e., no severe rusting, apparent structural defects or deterioration);
(D) Stored on an impervious surface, and if stored out-of-doors, within a structure that sheds rain and snow; and

(3) If the waste is subject to freezing and expansion, mechanical or physical means are employed to prevent freezing; and

(4) Any residue resulting from on-site recycling or treatment is managed either as used oil in accordance with the requirements of **subchapter 8**, or in accordance with applicable hazardous waste management requirements of **subchapters 1 through 7**; and

(5) Any water resulting from on-site treatment is discharged in accordance with **10 V.S.A. chapter 47** (for indirect injection wells, direct discharges); and

(6) Any water-miscible metal cutting and grinding fluid waste sent off-site for treatment are offered for transport only to a transporter permitted according to the requirements of **subchapter 4**.

(n) Used oil that meets the criteria of the VT02 hazardous waste code and/or exhibits a hazardous waste characteristic, is not subject to the requirements of **subchapters 3 through 7** of these regulations, but is subject to the Used Oil Management Standards of **subchapter 8**.

Note: Pursuant to **10 V.S.A. § 6621a**, no person shall knowingly dispose of used oil in a landfill.

(o) Non-terne plated used oil filters that are not mixed with wastes listed in **§§ 7-210 through 7-215** if:

(1) These oil filters have been gravity drained using one of the following methods:

(A) Puncturing the filter anti-drain back valve or the filter dome end and hot-draining;
(B) Hot-draining and crushing;
(C) Hot-draining and dismantling; or
(D) Any other equivalent hot-draining method that will remove used oil; or
(E) Draining and crushing using a mechanical, pneumatic, or hydraulic device designed for the purpose of crushing oil filters and effectively removing the oil; and

(2) All drained oils are collected and managed subject to these regulations.

Note: The Agency recommends that drained oil filters be recycled as scrap metal.

(p) Petroleum contaminated soil provided:

(1) The soil does not exhibit a characteristic of hazardous waste as defined in **§§ 7-205 through 7-208**, with the exception that soil subject to the corrective action requirements of **40 CFR Part 280** is not subject to regulation as hazardous waste solely for the waste codes of D018 through D043 of **§7-208**; and

(2) The soil does not contain waste listed in **§§ 7-210 through 7-215,** with the exception that soil may contain waste identified by the VT02 hazardous waste code; and

(3) The soil is evaluated to establish the type and concentration of the contaminant(s) present in accordance with the Vermont **Investigation and Remediation of Contaminated Properties Rule**, as amended; and

Note: Field screening and laboratory analysis or testing must be conducted by an independent professional consulting firm or laboratory using a method or methods that are either identified under **§ 7-219** of these regulations or that are otherwise approved by the Secretary.

(4) The soil is managed (e.g., stockpiled, treated, transported, or disposed) in accordance with the Vermont Investigation and Remediation of Contaminated Properties Rule, as amended.

(s) The wastes listed below are exempt from regulation under **subchapters 1 through 7** of these regulations except as specified in **subchapter 9** of these regulations. The following wastes are subject to regulation as universal wastes under **subchapter 9**:

(1) Batteries as described in **§ 7-902**;
(2) Pesticides as described in **§ 7-903**;
(3) Thermostats as described in **§ 7-904**;
(4) PCB-containing fluorescent light ballasts as described in **§ 7-905**;
(5) Lamps as described in **§ 7-906**;
(6) Mercury-containing devices as described in **§ 7-907**;
(7) Cathode ray tubes (CRTs) as described in **§ 7-908**;
(8) Postconsumer paint as described in § 7-909; and
(9) Aerosol cans as described in § 7-910.

(t) PCB-containing dielectric fluid and, with the exception of fluorescent light ballasts, electric equipment containing such fluid authorized for use and regulated under **40 CFR Part 761** of the Toxic Substances Control Act and that are hazardous only because they either meet the criteria of the VT01 hazardous waste identification code or fail the test for the Toxicity Characteristic (hazardous waste codes D018 through D043 only). This exemption is not applicable to waste contaminated with PCB-containing dielectric fluid.

(v) Waste which consists of discarded arsenical-treated wood or wood products which fails the test for the toxicity characteristic for hazardous waste codes D004 through D017 and which is not a hazardous waste for any other reason if the waste is generated by persons who utilize the arsenical-treated wood and wood products for these materials' intended end use.

(w) Contaminated wipes, as defined in § 7-103, that are to be sent off-site for cleaning and reuse, provided that:

(1) The contaminated wipes, when being accumulated and stored, and through the point in time when being transported off-site, are contained in non-leaking containers that are:
  (A) Marked “Excluded Contaminated Wipes”; and
  (B) Able to contain free liquids, should free liquids occur.

(2) During accumulation, containers are kept closed except when it is necessary to add or remove contaminated wipes. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the container rim.
(3) When a container becomes full or when contaminated wipes are no longer being accumulated, through the point in time when the container is transported off-site, the container is kept sealed with the lid properly and securely affixed to the container and all openings closed sufficiently to prevent leaks and emissions;

Note: If a bag is used to accumulate and/or store used oil contaminated rags or wipes, it must be kept in a closed container.

(4) The contaminated wipes are accumulated by the generator for no more than 180 days from the start date of accumulation for each container prior to being sent for cleaning;

(5) At the point when being transported off-site for cleaning, the contaminated wipes contain no free liquids as defined in § 7-103.

(6) Free liquids removed from the contaminated wipes or from the container holding the wipes must be managed according to the applicable requirements of subchapters 1 through 8 of these regulations;

(7) Generators maintain at their site documentation that:

(A) Identifies the name and address of the laundry or dry cleaner that is receiving the contaminated wipes;

(B) Verifies the 180-day accumulation time limit requirement of subsection (4) of this section is being met;

(C) Provides a description of the process the generator is using to ensure the contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning;

(8) The contaminated wipes are sent to a laundry or dry cleaner whose discharge, if any, is regulated under sections 301 and 402 or section 307 of the Clean Water Act.

(x) Reusable absorbent material contaminated with used oil that does not exhibit a hazardous waste characteristic provided that:

(1) The contaminated absorbent material is processed and reused on-site, any residual material that results from processing is managed in accordance with these regulations, and any contaminated water resulting from on-site processing is discharged in accordance with **10 V.S.A. chapter 47** (for indirect injection well, and direct discharges) and **chapter 48** (for groundwater protection); and

(2) Prior to being processed, the absorbent materials are accumulated and stored on-site in containers that are:

(A) Marked with words that identify the contents;

(B) Kept closed except to add or remove spent material;

(C) In good condition (i.e., no severe rusting, apparent structural defects or deterioration); and

(D) Stored on an impervious surface, and if stored out-of-doors, within a structure that sheds rain and snow.

§ 7-204 RECYCLING EXEMPTIONS

The following wastes are exempted from the provisions of these regulations if they are recycled as specified:

Note: Refer to **subchapter 6** for standards applicable to hazardous waste recycling activities not exempted under this section.

(e) Scrap metal that is recycled.

(f) Spent lead-acid batteries that are reclaimed or regenerated, provided:

(1) Persons who generate or collect spent lead-acid batteries, who regenerate spent lead-acid batteries, or store spent lead-acid batteries but do not reclaim them (other than spent lead-acid batteries that are to be regenerated) store such batteries under cover on an impervious surface;
(2) Transport of spent lead-acid batteries is done in compliance with **49 CFR Parts 171 through 177**;
(3) Persons who generate, collect, transport, store, or regenerate lead-acid batteries for reclamation purposes are subject to regulation only as specified in the table included under 40 CFR § 266.80(a); and
(4) Persons who store spent lead-acid batteries before reclaiming them, but do not reclaim them through regeneration are subject to regulations only as specified under 40 CFR § 266.80(b).

(g) Recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these metals provided:

(1) Persons who generate, transport, store or recycle these recyclable materials comply with **40 CFR Part 266, Subpart F**.
(2) Any generator or facility accumulating or storing these recyclable materials from which precious metals are reclaimed comply with any additional standards and requirements specified by the Secretary as necessary to protect human health and the environment. In making such determination, the Secretary shall use the standards and procedures specified in **40 CFR §§ 260.40 and 260.41**.

(h) Intact or shredded circuit boards being recycled provided that they are:

(1) Stored in containers sufficient to prevent a release to the environment prior to recovery; and
(2) Free of mercury switches, mercury relays and nickel-cadmium batteries and lithium batteries.

(i) Spent ethylene glycol or water-based ethylene glycol solutions (e.g., antifreeze) that are subject to regulation as hazardous waste for meeting only the criteria of the VT08 hazardous waste code provided that:

(1) The spent ethylene glycol or water-based ethylene glycol solution is recycled for reuse (e.g., filtered) and/or treated for reuse (e.g., additives added); and

(2) Containers and/or tanks used to hold spent ethylene glycol or water-based ethylene glycol solution are:

(A) Marked with words that identify the contents;
(B) Kept closed except to add or remove spent material;
(C) In good condition (i.e., no severe rusting, apparent structural defects or deterioration):
(D) Stored on an impervious surface, and if stored out-of-doors, within a structure that sheds rain and snow; and

(3) If the spent ethylene glycol or water-based ethylene glycol solution is subject to freezing and expansion, mechanical or physical means are employed to prevent freezing; and

(4) Any residue resulting from on-site recycling and/or treatment that is hazardous waste is managed as hazardous waste.

(i) Commercial chemical products that are themselves fuels (e.g., gasoline, aviation fuel, diesel fuel) provided:

(1) The commercial chemical product is burned for energy recovery, or is mixed or reclaimed to produce a fuel.

APPENDIX I

COMPARISON OF LQG, SQG AND VSQG CATEGORIES

Selected Regulatory Requirements	LQG	SQG	VSQG
File a Site Identification Form 8700-12	yes	yes	yes
Must determine Generator Category	yes	yes	yes
Maximum amount of hazardous waste generated per month *	no limit	2,200 pounds	220 pounds
Maximum amount of hazardous waste that may be stored on-site at any one time *	no limit	13,200 pounds	2,200 pounds
Maximum length of time hazardous waste may be stored on-site *	90 days**	180 days**	no limit
Must follow hazardous waste storage requirements, including:			
Keep waste under cover to protect from precipitation	yes	yes	yes
Store waste on impervious surface	yes	yes	yes
Keep waste container(s) closed	yes	yes	yes
Assure waste containers are in good condition	yes	yes	yes
Assure waste containers are compatible with waste	yes	yes	yes
Protect freezable wastes from freezing	yes	yes	yes
Maintain aisle space of 24 inches or greater	yes	yes	no
Post "Danger- Hazardous Waste Storage Area – Authorized Personnel Only" warning sign(s)	yes	yes	no
Post "No Smoking" sign(s) (only if store ignitable waste)	yes	yes	no
Conduct weekly inspection of hazardous waste storage area and maintain inspection log	yes	yes	no
Maintain an inventory of hazardous wastes in storage	yes	yes	no
Store ignitable waste at least 50 feet from the property line	yes	yes	no
Must label hazardous waste containers with:			
the words "Hazardous Waste"	yes	yes	yes
words to identify the container's contents	yes	yes	yes

* Generation or storage of more than 2.2 pounds of acutely hazardous waste confers LQG status. Acutely hazardous wastes – identified by the waste code "P" followed by three numbers – are listed in Appendix IV of the VHWMR.

** Section 7-311(c) of the VHWMR allows generators to request up to a 30-day extension "due to unforeseen temporary and uncontrollable circumstances," to be granted at the Secretary's discretion.

Selected Regulatory Requirements (cont'd)	LQG	SQG	VSQG
the date that waste was placed into storage	yes	yes	no
Hazardous waste disposal			
Must use a Uniform Hazardous Waste Manifest to ship waste	yes	yes	no
Must ship hazardous wastes with a certified transporter	yes	yes	no
Must comply with Federal land disposal restrictions	yes	yes	no
Must follow emergency preparedness measures			
Report spills or releases of greater than two gallons	yes	yes	yes
Have at least one person on-site or on-call at all times to respond to emergencies	yes	yes	no
Post emergency information near phones where hazardous waste is handled	no	yes	no
Provide hazardous waste training to employees	annually	initial***	no
Provide emergency communication device at hazardous waste storage area(s)	yes	yes	no
Provide fire and spill control equipment	yes	yes	no
Make arrangements with local emergency services	yes	yes	no
Maintain a written contingency plan	yes	no	no
Maintain a written training plan	yes	no	no
Reporting			
Submit biennial report on hazardous wastes generated	yes	no	no
Must certify facility closure if no longer generate hazardous waste	yes	no	no

REMINDER: The VHWMR cover each of the requirements listed above in detail. The VHWMR also address special case situations, such as the import and export of hazardous wastes. The VHWMR provide several conditional exemptions (see Appendix F). When determining generator status, do not include wastes exempted in Sections 7-203 and 7-204 of the VHWMR.

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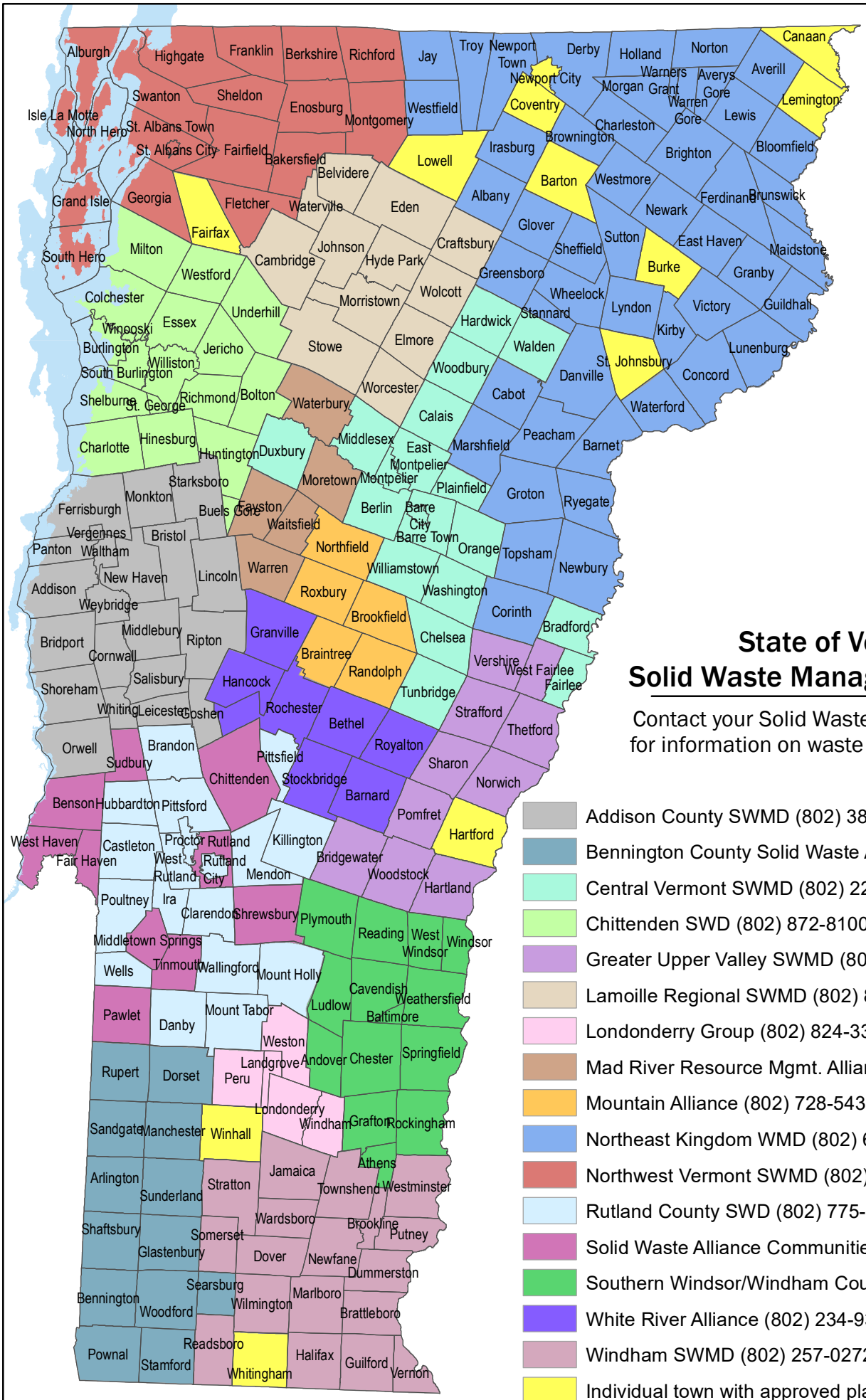
***SQG Training Requirement: Ensure that each employee is thoroughly familiar with evacuation signals and routes, and proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations as well as emergencies.

APPENDIX J

VERMONT SOLID WASTE MANAGEMENT ENTITIES
(BEGINS ON NEXT PAGE)



State of Vermont
Solid Waste Management Entities

Contact your Solid Waste Management Entity for information on waste services in your area

- Addison County SWMD (802) 388-2333
- Bennington County Solid Waste Alliance (802) 442-0713
- Central Vermont SWMD (802) 229-9383
- Chittenden SWD (802) 872-8100
- Greater Upper Valley SWMD (802) 674-4474
- Lamoille Regional SWMD (802) 888-7317
- Londonderry Group (802) 824-3306
- Mad River Resource Mgmt. Alliance (802) 244-7373
- Mountain Alliance (802) 728-5433
- Northeast Kingdom WMD (802) 626-3532
- Northwest Vermont SWMD (802) 524-5986
- Rutland County SWD (802) 775-7209
- Solid Waste Alliance Communities (802) 342-5701
- Southern Windsor/Windham Counties SWMD (802) 674-9235
- White River Alliance (802) 234-9340
- Windham SWMD (802) 257-0272
- Individual town with approved plan

Map Created 11/19/2021