

Hazardous Waste Basics for Conditionally Exempt Generators (CEGs) A guide for small businesses, municipalities, and others

What you need to know in
10 questions

1.

Why is Hazardous Waste
regulated?

Hazardous waste is regulated by the federal government and the State of Vermont because it has the potential to harm you, others, and the environment.

The Vermont Department of Environmental Conservation administers the VT Hazardous Waste Regulations.

2.

What is Hazardous Waste?

Something is regulated hazardous waste if:

1. It is waste, and
2. It is specifically listed in regulation, or
3. It has one of the following hazardous characteristics:
 - **Toxic** (poisonous)
 - **Corrosive** (readily corrodes flesh, metal)
 - **Ignitable** (readily catches fire)
 - **Reactive** (readily explodes or reacts violently)

Acutely hazardous waste

Most CEGs do not handle chemical compounds that are listed as acutely hazardous (P-listed), but be aware that the generation and storage thresholds for these wastes are much lower than for other hazardous wastes.

(More on generation and storage thresholds later.)

See [Appendix IV of the Vermont Hazardous Waste Management Regulations](#) for a list of acutely hazardous wastes.

3.

Do I generate hazardous
waste?

These facilities commonly generate hazardous waste:

Gas stations

Fuel distributors

Vehicle repair shops

Dry cleaners

Schools and colleges

Wood-products manufacturers

Logging/saw mills

Metal fabricators

Metal finishers

Printing/photo processing

Construction

Laboratories

Medical offices

A very brief list of common hazardous wastes:

Waste...

Fuel*

Paints

Stains

Solvents

Oil filters*

Cutting oils*

Antifreeze*

Lab chemicals

Oily solids

Spill cleanup material

Dry cleaning solvent

Batteries*

Inks

X-ray waste

Dental amalgams

Pesticides*

Fluorescent lamps
(bulbs)*

* Some hazardous wastes are exempt from hazardous waste regulations IF recycled or reused. More on these later.

4.

How can I tell if something is
hazardous waste?

It's your responsibility to determine if your waste is hazardous.

Make a hazardous waste determination in just 4 steps:

1. Take an inventory of your waste
2. Determine if the waste is exempt when recycled/reused
3. Determine if it is listed
4. Determine if it has any hazardous waste characteristics

1) inventory:

Start by taking an inventory of ALL the waste you generate, including:

- Process wastes, byproducts, spent chemicals
- Maintenance wastes, including used oil, spent fluorescent bulbs (lamps), parts washing solvent (even if serviced by a separate company)
- Outdated or unneeded chemicals, cleaners, materials
- Spill cleanup material & contaminated debris
- Emission control dust & boiler blow-down water

2) determine if exemptions apply:

Some common wastes are exempt from hazardous waste regulation if managed for recycling or reuse, including:

- Used oil (see page 19)
- Oil filters
- Oily rags/wipes
- Lead-acid batteries
- Antifreeze
- CFC refrigerants
- Universal Wastes like fluorescent lamps & older TV/computer monitors (see page 19)
- Scrap metal

3) determine if waste is listed

If the waste is not exempt, determine if it is specifically listed as hazardous in Vermont Hazardous Waste regulations.

A list of hazardous wastes and their waste codes commonly generated by small businesses is included as Appendix A in the [CEG Handbook](#).

4) determine if waste is characteristic:

If the waste is not exempt or listed, determine if it exhibits hazardous characteristics.

You can use knowledge of the process that produces the waste or laboratory testing to determine if a waste is listed or has hazardous characteristics.

For more information on making a determination of characteristic waste, see the [CEG Handbook](#).

Examples of listed and characteristic hazardous waste & their waste codes

Federally-listed waste

FO01 Certain spent halogenated solvents used in degreasing, including still bottoms from spent solvents.
(ex. tetrachloroethylene, methylene chloride, carbon tetrachloride)

Vermont-listed waste

VT02 Waste with >5% by weight petroleum distillates
(ex. oily solid (like speedi dri), hydraulic oil, crankcase oil)

Characteristic waste

DO01 Ignitable waste
(ex. Solvent-based paint waste, petroleum-based parts washer solvent, lacquer/thinner, degreaser)

DO02 Corrosive waste
(ex. sodium hydroxide, acetic acid)

DO08 Lead-containing waste

5.

What is a Hazardous Waste
Generator?

Any business, municipality, or other organization whose act or process produces hazardous waste is a Generator.

Hazardous Waste Generators are categorized according to the amount of hazardous waste generated per month and stored at any time.

Generators of the smallest amounts are Conditionally Exempt Generators (CEGs), and are subject to fewer regulations (see [Appendix G of the CEG Handbook](#)).

Most hazardous waste generators in Vermont are CEGs

Thresholds for CEGs:

- Generate under 220 lbs/month hazardous waste
- Generate under 2.2 lbs/month acutely hazardous waste
- Store less than 2,200 lbs hazardous waste on site at any time

6.

Are Used Oil and Universal
Wastes hazardous waste?

Yes, unless handled properly.

Used oil and Universal Wastes are very common and low-risk when handled appropriately, so they are regulated separately, & do not count towards your Hazardous Waste generation totals when handled properly, and recycled or reused.

Used oil is any used petroleum product from crude or synthetic oil.

Universal Waste includes batteries, pesticides, cathode ray tubes (older TVs and computer monitors), paint, fluorescent lamps (bulbs), mercury-containing devices (switches), mercury thermostats, PCB-containing fluorescent light ballasts.

See the [CEG Handbook](#) for more information.

7.

What hazardous waste
rules apply to CEGs?

1. **Notify** the VT Hazardous Waste Management Program of your generator status. Use the [VT Hazardous Waste Handler Site ID form](#). You will get an EPA Site ID Number for each location where you generate hazardous waste.
2. **Minimize the risk of fire, explosion, or release** of hazardous waste in your operations. See the [CEG Handbook](#), additional online trainings, or attend a DEC [workshop](#).
3. **Stay under the CEG thresholds** for generation and storage.

Take these actions to minimize risk:

Required:

1. Label waste with "Hazardous Waste" and the contents (ex. "solvent").
2. Use containers that are compatible with the waste, in good condition, and kept closed.
3. Store containers on an impervious surface, protected from rain and snow.
4. Keep wastes that are subject to freezing & expansion in a heated space.
5. Handle containers carefully to prevent leaks.

Best practices:

- ✓ Use the least-hazardous chemicals you can.
- ✓ Have spill kit and practice how to use it.

8.

How do I get rid of my
hazardous waste?

First, let's be clear:

It is prohibited to dispose of hazardous waste in solid waste (trash), wastewater or sewer systems, or to the land or waters of the state.

There are two ways CEGs may properly dispose of hazardous waste.

Option 1: transport your own waste* to:

- A permitted hazardous waste storage facility.
- A hazardous waste collection event that accepts CEG waste (always call first).
- A facility that uses, reuses, recycles, or reclaims the waste.
- Another VT facility you own that meets the (stricter) Small or Large Quantity Generator requirements.

Find a facility or event near you by contacting your local solid waste management entity at 802recycles.com.

*Note that self-transport has its own risks, and that DOT regulations may apply.

Always think and act carefully when handling hazardous waste.

Contact the DEC Hazardous Waste Program if you have questions.

Option 2: Hire a permitted hazardous waste transporter to collect your waste and take it to an appropriate facility.

Find permitted hazardous waste haulers [here](#) (look for those with an “H” in the right-hand column), or contact the DEC Waste Management & Prevention Division at [802-828-1138](tel:802-828-1138).

9.

How can I generate less
hazardous waste?

Hazardous materials are expensive to buy, expensive to handle, expensive to dispose of once they are hazardous waste, and dangerous to handle...all good reasons to practice good Pollution Prevention.

Pollution Prevention is any practice that reduces, eliminates, or prevents pollution at its source.

It benefits the environment, your health, and your budget.

Pollution Prevention basics:

Avoid

Substitute less toxic materials to avoid generating hazardous waste

Reduce

Minimize excess material use & overconsumption / waste

Reuse

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

Recycle

Some hazardous waste can be processed to reclaim spent materials

Dispose

A last resort: costly, and you could be liable for impacts indefinitely

10.

Where can I learn more?

Visit

<http://dec.vermont.gov/waste-management/hazardous> for:

- Help identifying Hazardous Waste
- Guidance on handling Used Oil & Universal Waste
- Help finding less-hazardous alternatives
- List of most common small business Hazardous Waste codes
- Waste-specific tutorials

Or call 802-828-1138