

HAZARDOUS MATERIALS PROGRAM ENVIRONMENTAL FACT SHEET

Managing Hazardous Waste at Solid Waste Facilities

While there are many requirements that pertain to the operation of Solid Waste Management Entity (SWME) Household Hazardous Waste (HHW) collection facilities in Vermont (e.g., the Vermont Solid Waste Management Rules), this fact sheet is intended to assist solid waste facility operators with understanding and following the requirements of the [Vermont Hazardous Waste Management Regulations \(VHWMR\)](#).

What is a solid waste facility?

Solid waste facilities may be permitted to collect trash, organic wastes, recyclables, construction and demolition debris (C&D), scrap metal, used oil, and other waste materials. A solid waste facility may also be permitted to collect HHW and hazardous waste. Hazardous waste can mean the hazardous waste generated on-site by solid waste facilities, as well as the hazardous waste that is collected from small businesses, schools, and municipalities who are very small quantity generators (VSQGs) of hazardous waste. While there are many solid waste facilities in Vermont, only those that are permitted to accept HHW and hazardous waste generated by VSQGs may do so. Please refer to the end of this fact sheet to access a map of permitted SWME HHW facilities and their contact information.

Are solid waste facilities regulated under the VHWMR?

All hazardous waste generators (non-households) in Vermont, including solid waste facilities, must manage their hazardous waste, universal waste, and used oil according to the requirements established in the VHWMR. Solid waste facilities may generate hazardous waste through building and vehicle maintenance, spill cleanup, and other activities. Examples of hazardous waste might include bad fuel or other ignitable wastes, lithium-ion batteries, oily wastes, and antifreeze that contains ethylene glycol.

Solid waste facilities may also be permitted to accept hazardous waste from VSQGs as part of their solid waste operating permit. When a solid waste facility that is permitted and operating as an HHW collection facility accepts hazardous waste from VSQGs, they assume responsibility for this waste and must manage it as the hazardous waste generator. Wastes that might be generated while operating and maintaining solid waste facilities are also regulated under the VHWMR; such waste may include universal waste lamps, post-consumer paint, aerosol cans, and used oil.

Note: All hazardous waste generators in Vermont may be subject to a compliance inspection by the Hazardous Materials Program. Please refer the [Inspections](#) webpage for more information.

What about household hazardous waste (HHW)?

HHW is exempt from regulation under the VHWMR per § 7-203(a). However, the [Vermont Solid Waste Management Rules](#) § 6-1403 establish requirements and strict management standards for HHW collected by solid waste facilities. Many of these requirements are similar to the VHWMR standards for managing hazardous waste from VSQGs (e.g., containers of HHW must remain closed and stored on an impervious surface). If you have questions about accepting and/or managing HHW at a solid waste facility, please contact the Vermont DEC Solid Waste Program. Please note only facilities that are permitted to accept HHW may do so.

How do solid waste facilities determine their generator category?

In order to understand how the VHWMR apply to a solid waste facility, the facility must determine its generator category. As shown in the table below, there are three categories of hazardous waste generators, each with unique limits for storage and accumulation of hazardous waste: Very Small Quantity Generators (VSQGs), Small Quantity Generators (SQGs), and Large Quantity Generators (LQGs). A generator's category is based on the type and quantity of hazardous waste generated each calendar month. For solid waste facilities specifically, the monthly total must include the quantity of hazardous waste generated on-site *and* the quantity of hazardous waste accepted from VSQGs; HHW should not be included. The amount of hazardous waste *accumulated on-site* must also be considered when determining generator category.

Generator Category	HW Generated (calendar month)	Acute HW Generated (calendar month)	HW Accumulation (on-site at any time)
VSQG	≤ 220 lbs. (100 kg)	≤ 2.2 lbs. (1 kg)	< 2,200 lbs. (1,000 kg) HW ≤ 2.2 lbs. (1 kg) acute HW
SQG	> 220 lbs. (100 kg), and < 2,200 lbs. (1,000 kg)	≤ 2.2 lbs. (1 kg)	< 13,200 lbs. (6,000 kg) HW
LQG	Any amount	> 2.2 lbs. (1 kg)	> 13,200 lbs. (6,000 kg) HW
	≥ 2,200 lbs. (1,000 kg)	Any amount	≥ 2.2 lbs. (1 kg) acute HW

Note: HW = hazardous waste. Generators should be aware that used oil, universal waste, and exempt waste (conditional, recycling), have different requirements for accumulation and storage that are not covered in this fact sheet.

What are the requirements for managing hazardous waste at a solid waste facility?

Solid waste facilities that routinely generate hazardous waste, even in small amounts, are required to notify as a hazardous waste generator, obtain an EPA ID, and manage their hazardous waste (including

hazardous waste accepted from VSQGs) according to the applicable requirements established in [Subchapter 3](#) of the VHWMR. The instructions and form for notifying may be accessed at the top of the [Hazardous Waste Forms and Documents](#) webpage. As noted in the previous section, the hazardous waste regulations that apply to a solid waste facility depend on the facility's generator category. Hazardous waste generator standards for each category are established in Subchapter 3. Refer to the [VSQG Guidebook](#) and [SQG Guidebook and Self-Evaluation Checklist](#) for more information on managing hazardous waste as a VSQG or SQG.

What are the requirements for managing universal waste at a solid waste facility?

The standards for managing universal waste, including but not limited to batteries and mercury-containing lamps, are established in [Subchapter 9](#) of the VHWMR. Please refer to the [Universal Waste](#) fact sheet for more information on the requirements that apply to universal waste. For more information on becoming permitted to collect specific types of universal waste under the [special manufacturer-funded collection programs](#), contact the VT DEC Solid Waste Program.

What are the requirements for managing used oil at a solid waste facility?

The standards for managing used oil are established in [Subchapter 8](#) of the VHWMR. Please refer to the [Used Oil](#) and [Used Oil Burning](#) fact sheets for more information on the requirements that apply to used oil.

Are there any best practices that solid waste facilities should consider adopting?

Solid waste facilities that are not permitted to accept HHW or hazardous waste should never do so. In addition, permitted facilities may not accept hazardous waste from SQGs or LQGs. With this in mind, facilities may benefit from becoming familiar with using [ANR Atlas](#). This tool allows users to quickly look up the hazardous waste generators within a defined area and provides basic information on each (e.g., name, address, generator category, EPA ID). Solid waste facilities can use this tool to verify the generator category of small businesses which self-deliver their hazardous waste to the facility. Users may also download reports in order to save or print this information. If you need assistance with using ANR Atlas to evaluate hazardous waste generators within a defined area, please contact the Hazardous Materials Program using the information at the end of this fact sheet.

Solid waste facilities should also consider adopting an inventory system for hazardous waste. Even a simple spreadsheet that tracks the amounts of hazardous waste accepted from VSQGs, stored on-site, and shipped off-site might assist facilities with determining their generator category on an ongoing basis. It might also help facilities with distinguishing accepted wastes that are regulated as hazardous waste versus those that are regulated as HHW; particularly for the logistics associated with on-site storage, transport off-site, and taxes.

Resources and Contact Information

If you have questions about managing hazardous waste, universal waste, used oil, or other VHWMR-

regulated materials at a solid waste facility, please contact the Hazardous Materials Program using the contact information at the end of this fact sheet. Also be aware that compliance handbooks, fact sheets, and additional guidance resources may be accessed via the [Resources for Hazardous Waste Handlers](#) webpage.

If you have questions about solid waste facility permitting; or questions about managing trash, organic wastes, recyclables, special recycling programs, construction and demolition debris (C&D), or HHW at a solid waste facility; please contact the [Vermont DEC Solid Waste Program](#).

To access a map of SWMEs and their contact information, please refer to the [Contact Your Waste District or Town](#) webpage.

For more information regarding how the VHWMR apply to solid waste facilities, or if you have other hazardous waste management questions, please contact:

Hazardous Materials Program – Hazardous Waste Section
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