

HAZARDOUS MATERIALS PROGRAM ENVIRONMENTAL FACT SHEET

Emergency Preparedness and Prevention Requirements for Small Quantity Generators (SQGs)

It is critical that all hazardous waste generators work to prepare for and prevent emergencies that could occur from their activities, as hazardous waste poses a threat to human health and the environment. All hazardous waste generators are required to conduct hazardous waste management operations in a manner that minimizes the possibility of fire, explosion, or a release. Beyond this, small quantity generators (SQGs) and large quantity generators (LQGs) are required to take specific steps established in the [Vermont Hazardous Waste Management Regulations](#) (VHWMR). This fact sheet provides an overview of the regulatory requirements that apply to SQGs; LQGs should refer to the [Emergency Preparedness and Prevention Requirements for LQGs](#) fact sheet. Please note that this fact sheet is a summary of key requirements; refer to the VHWMR for specific requirements and direct any questions to the Hazardous Waste Section using the contact information at the end of this fact sheet.

What is required in the event of a release of hazardous material?

Anyone that handles hazardous materials, including hazardous waste, should be aware of the Emergency and Corrective Actions requirements established in § 7-105 of the VHWMR. A hazardous material spill of two gallons or more, or a spill that is less than two gallons but poses an actual threat to human health or the environment (e.g., gallon of gasoline spilled to a wetland), must be reported immediately (as the response allows) to the Department of Environmental Conservation (DEC) Spill Team by calling either:

- **1-800-641-5005 (24-hour Hazardous Materials Spills Hotline); or**
- **802-828-1138 (DEC Spill Team during regular business hours (M-F 7:45 am - 4:30 pm EST))**

If there is any question as to whether a spill must be reported, DEC strongly encourages calling to report. For more information on the requirements for responding to a release, please refer to the [Hazardous Material Spill Response Fact Sheet](#).

What emergency preparedness and prevention requirements apply to SQGs?

The emergency preparedness and prevention requirements that apply to SQGs include the following:

Required Equipment

The **following items and systems must be in place** where hazardous waste is generated, accumulated, or stored, and it must be tested and maintained:

- Equipment: portable fire extinguishers, fire control, spill control, and decontamination.
- Internal communications or alarm system capable of providing immediate emergency instruction to facility personnel.
- Device (e.g., cell phone or two-way radio) immediately available at the scene of operations,

capable of summoning emergency assistance from local police or fire departments, or state or local emergency response teams.

- Water at adequate volume and pressure to supply water hose streams or foam producing equipment, or automatic sprinklers.

Access to Communications or Alarm Systems

All personnel involved in hazardous waste handling operations **must have immediate access to an internal alarm (e.g., fire alarm) or emergency communication device**. For smaller facilities, audible voice instructions are adequate to meet this requirement. If there is only one employee on the premises during operations, they must have immediate access to a device (e.g., cell phone) capable of summoning external assistance.

Aisle Space

In all areas where hazardous waste is generated, accumulated, or stored, SQGs must **maintain aisle space of at least 24 inches** to allow access for personnel and emergency equipment during an emergency.

Arrangements with Local Authorities

SQGs must provide emergency responders (i.e., police and fire departments, emergency response contractors, equipment suppliers, and local hospitals) with information about the layout of their facility, the hazardous wastes that may be onsite, and other details relevant to possible emergencies (see below). In the VHWMR, this is referred to as “making arrangements” with local authorities. This is typically achieved by sending written information about the facility via email or mail or inviting emergency responders to conduct a walkthrough of the facility. If conducting a walkthrough, facilities must retain a record in their files noting the following information: date of event, emergency personnel present, and summary of the information provided.

The following are required when making emergency arrangements, and must be specific to the SQG facility, wastes, and hazards:

- If making arrangements in writing, include a description of the facility layout; types and quantities of hazardous waste, their properties, and hazards; places personnel work; entrances to roads; evacuation routes; and injuries/illnesses that could result from an emergency.
- Document arrangements with the local fire department and any other organization necessary to respond to an emergency; to comply with this requirement, save any written communication between facility and emergency responders in facility files as this information will be requested during a compliance inspection.
- When attempting to make arrangements with the local fire department, determine the potential need for the local police department, emergency contractors, equipment suppliers, and local hospitals. For example, if a facility only handles oil-contaminated solids, they are unlikely to require police or hospitals for a waste-related emergency.
- Documentation must be included in the operating record that either confirms such arrangements actively exist or confirms that attempts to make such arrangements were made.

Note: Arrangements may be made with the Local Emergency Planning Commission (LEPC), however, generators should be aware that *Tier II reporting (alone) does not satisfy VHWMR requirements*. Please direct questions about Tier II to the following mailing or email address:

Statewide LEPC

45 State Dr.

Waterbury, VT 05671

DPS.StatewideLEPC@vermont.gov

Emergency Coordinator

SQGs must **designate at all times at least one employee either on the premises or on call** with the responsibility for coordinating all emergency response measures. This individual must be trained in emergency response procedures as they apply to the facility. The emergency coordinator must respond to any emergencies that arise as follows:

- In the event of a fire, call the fire department, or attempt to extinguish using a fire extinguisher.
- In the event of a release of hazardous material, comply with the applicable emergency action requirements (see earlier section in this fact sheet about responding to releases).
- In the event of a fire, explosion, or other release which could threaten human health outside the facility or when the generator has knowledge that a spill has reached surface water, the generator must immediately report to the National Response Center (800-424-8802).

SQGs must **post the following information** next to phones or in areas directly involved in the generation and storage of hazardous waste.

- Name and emergency phone numbers of the emergency coordinator(s).
- Location of fire extinguishers and spill control material, and, if present, fire alarm.
- Phone number of the fire department, unless the facility has a direct alarm.

Training Requirements

SQGs must **ensure that all employees are thoroughly familiar with evacuation signals and routes, and proper waste handling and emergency procedures** relevant to their responsibilities during normal facility operations and emergencies. DEC does not prescribe specific methods for how to comply with this training requirement and each SQG facility may determine their own method. Examples of training methods include the following: hiring a consultant to provide in-house training to employees, assigning a trained staff member to provide either classroom or on-the-job training in waste handling techniques to new employees, or designing a self-directed course covering relevant waste handling topics for new employees to complete. Note that some SQG facilities have successfully incorporated the [SQG Guidebook and Self-Evaluation Checklist](#) into their training program.

For more information regarding emergency preparedness and prevention requirements, or if you have other hazardous waste management questions, please contact:

(Contact Information on Next Page)

Hazardous Materials Program – Hazardous Waste Section
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Vermont Department of Environmental Conservation
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Montpelier, VT 05620-3704
802-828-1138
<https://dec.vermont.gov/waste-management/hazardous>