

Hazardous Waste Management Program

Generator Status and Counting Your Waste FAQs

What is generator status?

The Vermont Hazardous Waste Management Regulations (VHWMR) classify hazardous waste generators, by site, into three categories based on the amount of hazardous waste produced (generated) per month or in storage on-site (see table below). Conditionally Exempt Generators (CEGs), the least regulated category, generate less than 220 pound of hazardous waste per month and have less than 2,200 pounds of hazardous waste in storage. Large Quantity Generators (LQGs), the most regulated category, generate more than 2,200 pounds of hazardous waste per month or have more than 13,200 pounds of hazardous waste in storage. Small Quantity Generators (SQGs) fall between these two categories. The exception to these general rules for CEGs and SQGs is when the facility generates more than 2.2 pounds of acutely hazardous wastes (P-listed) and is automatically regulated as a Large Quantity Generator (LQG).

Maximum Amount of Hazardous Waste	CEG	SQG	LQG
Generated per Month	220 pounds 2.2 pounds P-listed waste	2,200 pounds 2.2 pounds P-listed waste	No Limit
Stored on-site at any time	2,200 pounds	13,200 pounds	No Limit

Amount of HW	Approximate Drum Equivalents
up to 220 pounds	half a 55 gallon drum
up to 2,200 pounds	five 55-gallon drums
up to 13,200 pounds	thirty 55-gallon drums
over 13,200 pounds	over thirty 55-gallon drums

NOTE: Estimation based on a specific gravity of 1 (i.e., water-like consistency)

How is generator status determined?

A generator's status is based on the total quantity (by weight) of hazardous waste generated at the facility per month and the total amount of hazardous waste accumulated on-site at any given time. Remember that you are adding up the waste that you generate in a month, **not** what you ship off-site in a month. Vermont-listed hazardous waste may be averaged over a six month period. For example, a facility generated 2,000 pounds of oil contaminated soil (VT02) in March and in April generated 400 pounds of oil contaminated solids (absorbent pads and granular absorbent) (VT02). The facility did not generate any other VT02 waste until December of that year. Therefore, if no other waste was generated this facility would be a small quantity generator (average monthly generation rate of 600 pounds).

How can I calculate how much hazardous waste I generate in a month?

Review all waste streams generated at your facility (i.e., for each individual site) and complete a hazardous waste determination for each waste stream. Then determine the quantity, by weight, of each hazardous waste stream produced (or generated) per calendar month, and add the monthly weight of all hazardous waste streams to determine the total monthly generation of hazardous waste generated.

Keep in mind that any facility that generates more than 2.2 lbs. of P-listed hazardous waste (acutely toxic) per month is regulated as a LQG.

Some facilities find it helpful to maintain a running log of hazardous waste containers that, for each container, identifies the type of waste held, when the container is put into service, when the container becomes full, and the weight (or approximate weight) of the filled container. This is an easy way to track (and document) the generation rate for individual hazardous waste streams as well as the total generation rate for a facility.

Reminder: Generator status is based upon how much hazardous waste is generated in a calendar month, not on the amount shipped in a particular month (or averaged over the number of months between shipments).

Do I have to count Vermont-listed hazardous wastes when calculating generator status?

Vermont-listed hazardous wastes (see VHWMR section 7-211) have to be counted, however, you may average the amount of a Vermont-listed waste generated over a six-month period and use that value when calculating generator status. For example, if a company generates 2400 pounds of oily debris waste (VT02) in a single month as a result of a fuel spill clean-up, they could average that 2400 pound amount over six months, meaning their monthly generation rate for that waste stream would be just 400 pounds. If that is the only waste generated by the company, its generator status would be that of an SQG.

Are there any hazardous wastes that don't count toward generator status?

If a hazardous waste is exempted under VHWMR sections 7-203 and 7-204, it should not be counted when calculating your generator status. Some examples of exempt wastes are properly drained oil filters and antifreeze that is recycled. Keep in mind that many exemptions are conditional and if the exemption conditions are not met, the waste is not exempt and would count toward your generator status.

Hazardous waste that is recycled on-site only needs to be counted once toward your generator status.

What if hazardous waste generation rates vary widely from month to month?

Since generator status is based on a facility's monthly hazardous waste generation rate, a facility with widely variable generation rates can either recalculate their status on a monthly basis or simply manage their facility at the higher status level. Some generators find it easier to implement the more stringent standards of the higher status level instead of trying to determine which standards must be met each month. For example, if a generator routinely exceeds the upper threshold for SQG status, it may be easier (and cost effective) to always meet the more stringent LQG standards (e.g., maintain written employee training and contingency plans).

What if my generator status changes?

If your generator status changes you must update your Vermont Hazardous Waste Handler Site ID Form. See the Site ID# Form FAQs, Site ID Form and Site ID Form Instructions.

What happens to my generator status when I have a large spill or a one-time clean-out?

If you have a large spill or a one-time clean out, you must manage your hazardous waste during that month according to the generator status for the amount of waste generated. You must continue to manage the waste according to the requirements for the higher generator status until that waste is transported off-site. Once the waste is shipped off-site

for proper disposal, then you can manage your waste according to your typical generation rate and status. Notice of generator status change is not required for a one-time event, such as a spill or clean-out.

How can I reduce hazardous waste generation?

First, a complete evaluation of all products purchased that end up as hazardous wastes should be completed. Are these products necessary? Are there non-hazardous alternatives? Second, good housekeeping practices can often reduce hazardous waste generation. If your facility is using large quantities of absorbents for spills, actions should be taken to reduce the occurrence of spills to both reduce hazardous waste generation and to achieve a safer, cleaner work environment. Third, seek assistance. There are consultants who specialize in this type of work. The Agency's Environmental Assistance Division conducts field assessments, maintains a reference library, and compiles reports that suggest alternatives to achieve waste prevention and reduction. You can reach the Agency's Environmental Assistance Office at (1-800-974-9559), or visit their web page [here](#).

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