



## Determining hazardous waste generator size

A waste is a material that is unusable for its intended purpose, discarded, or intended to be discarded. Idaho adopts the federal hazardous waste (HW) regulations ([40 CFR parts 124, 260-266, 268, 270, 273, and 279](#)) into state rules ([IDAPA 58.01.05](#)). These regulations require owners and operators of facilities that generate waste to determine whether or not wastes are hazardous and manage them accordingly.

### Hazardous waste generator sizes

EPA established three generator categories based on how much HW a business generates each calendar month. Each generator size is regulated differently:

**Very Small Quantity Generators (VSQGs)** generate less than 220 pounds of HW and less than 2.2 pounds of acute HW in a calendar month. VSQGs are exempt from many HW management regulations, provided they comply with basic requirements found in [40 CFR 262.14](#). VSQGs must (1) determine whether the wastes they generate are hazardous, (2) limit on-site storage to no more than 2,200 pounds of HW or 2.2 pounds of acute HW, and (3) properly dispose of HW at an approved municipal solid waste landfill; a permitted HW facility; a facility that beneficially uses, legitimately recycles, reclaims waste; or a LQG under the control of the same entity/owner as the VSQG.

See DEQ's [Hazardous Waste Determinations](#) fact sheet for more information on hazardous and acute hazardous waste.

**Small Quantity Generators (SQGs)** generate between 220 and 2,200 pounds of HW and less than 2.2 pounds of acute HW in a calendar month. SQGs must comply with the regulations found in [40 CFR 262.16](#).

**Large Quantity Generators (LQGs)** generate more than 2,200 pounds of HW or more than 2.2 pounds of acute HW in a calendar month. LQGs must comply with HW regulations found in [40 CFR 262.17](#).

### How do I determine my generator size?

Count the amount of HW and acute HW you produce each calendar month.

**DO count** the quantities of listed and characteristic HWs that are:

- Accumulated on the property for any period of time before disposal or recycling
- Packaged and transported away from your business
- Placed directly in a regulated treatment or disposal unit at your place of business
- Hazardous still bottoms or sludges when removed from storage tanks

Many HWs are liquids. You will need to convert gallons to pounds to count those wastes. To do this, you must know the liquid's density. Alternatively, if you have the ability to weigh containers when full, you can subtract the container weight from the total to find the weight of

the HW liquid inside. As a basic reference, 27.5 gallons, half a standard 55-gallon drum, of liquid with a density similar to water will weigh just over 220 pounds.

**Do NOT count:**

- Waste that meets limited requirements for commonly generated wastes. These wastes can be managed following the less stringent requirements referenced below instead of the usual HW requirements. Common examples include:
  - Used oil: [40 CFR 279](#)
  - Scrap metal that is recycled: 40 CFR 261.4
  - HW managed as part of an infrequent episodic event: [40 CFR 262 Subpart L](#)
  - Lead-acid batteries that are reclaimed: [40 CFR 266.80](#)
  - Universal wastes (e.g., certain batteries, recalled and collected pesticides, mercury-containing equipment, lamps): [40 CFR 273](#)
- Waste left in the bottom of a container that has been thoroughly emptied through conventional means (e.g., pouring, pumping). These containers are considered empty. Note that this does not apply to acute HW.
- Waste that is reclaimed continuously on site without storing before reclamation (e.g., dry cleaning solvents).
- Waste that is managed in an elementary neutralization unit (ENU) without being stored first. An ENU is a totally enclosed treatment unit or a wastewater treatment unit.
- Waste that is discharged **directly** to publicly-owned treatment works (POTW) **without** being stored or accumulated first. POTWs are public utilities, usually owned by the city, county, or state, that treat industrial and domestic sewage for disposal. Discharges to a POTW must comply with the Clean Water Act. Check with your POTW before disposing of waste in this manner.
- Waste that has already been counted once during the calendar month and is treated on site, then used again. Only count the waste once per month.

## For More Information

For specific questions, contact your nearest DEQ regional office:

- |                                 |                              |
|---------------------------------|------------------------------|
| • Boise: (208) 373-0550         | • Lewiston: (208) 799-4370   |
| • Coeur d'Alene: (208) 769-1422 | • Pocatello: (208) 236-6160  |
| • Idaho Falls: (208) 528-2650   | • Twin Falls: (208) 736-2190 |

For general information see [www.deq.idaho.gov](http://www.deq.idaho.gov) or call the Hazardous Waste Bureau at the state office at (208) 3730-502.