



Idaho Hazardous Waste Generator Requirements Summary

	Very Small Quantity Generator (VSQG)	Small Quantity Generator (SQG)	Large Quantity Generator (LQG)
Weight of Waste Generated/Calendar Month	<ul style="list-style-type: none"> • ≤ 220 pounds HW or • ≤ 2.2 pounds AHW 	<ul style="list-style-type: none"> • 220 pounds to 2,200 HW or • ≤ 2.2 pounds AHW 	<ul style="list-style-type: none"> • ≥ 2,200 pounds HW or • > 2.2 pounds AHW
Inventory	<ul style="list-style-type: none"> • Identify all HW on site • Determine pounds per month generated 	<ul style="list-style-type: none"> • Identify all HW on site • Determine pounds per month generated 	<ul style="list-style-type: none"> • Identify all HW on site • Determine pounds per month generated
Notification	No requirements; may obtain EPA ID number	<ul style="list-style-type: none"> • Notify DEQ to obtain EPA ID number • Beginning 09/01/21: Re-notify every 4 years 	<ul style="list-style-type: none"> • Notify DEQ to obtain EPA ID number • Re-notify with submittal of each biennial report
Accumulation Time and Quantities	<ul style="list-style-type: none"> • If > 2,200 pounds HW accumulated, VSQG becomes SQG • If > 2.2 pounds AHW accumulated, VSQG becomes LQG • No accumulation time frames 	<ul style="list-style-type: none"> • If > 13,200 pounds HW or 2.2 pounds of AHW accumulated, SQG becomes LQG • Can store HW ≤ 180 days (270 days if TSD > 200 miles away) 	Can store HW ≤ 90 days
Satellite Accumulation	Not applicable	Same as LQG	<ul style="list-style-type: none"> • Can store ≤ 55 gallons of HW or ≤ 1 quart of AHW at or near point of generation, under direct control of operator, for an indefinite period • Accumulation date added within 72 hours of reaching accumulation limit
Container Marking Requirements	<ul style="list-style-type: none"> • No requirement unless shipping to a LQG • If shipping to LQG under the control of the same person as the VSQG: Same as LQG, except accumulation start date not required 	Same as LQG	<ul style="list-style-type: none"> • Each container must display: <ul style="list-style-type: none"> - The words "Hazardous Waste" - Accumulation start date - Indication of the hazards of the contents
Container Requirements	No direct requirements, but containers should be kept closed and should not leak	<ul style="list-style-type: none"> • Same as LQG, except: <ul style="list-style-type: none"> - No requirement to store ignitable or reactive waste ≥ 50 feet from property line 	<ul style="list-style-type: none"> • Containers storing HW must be: <ul style="list-style-type: none"> - Compatible with the HW - Closed unless adding or removing waste - Handled to avoid damage - In good condition - Inspected weekly • Segregate containers: <ul style="list-style-type: none"> - Store ignitable or reactive waste ≥ 50 feet from the property line - Store incompatibles separately
Tank Requirements	No direct requirements, but tanks should be kept closed and should not leak	Extensive requirements; see regulations or contact DEQ	Extensive requirements; see regulations or contact DEQ
Containment Building Requirements	Not applicable	Extensive requirements; see regulations or contact DEQ	Extensive requirements; see regulations or contact DEQ
Waste Minimization	No requirement	Certify on manifest good faith effort to minimize waste generation	Certify on manifest that a waste minimization program is in place
Reporting	No requirement, except if Episodic Generator provisions are used, must submit state annual report	<ul style="list-style-type: none"> • State annual report • Exception letter filed within 60 days of shipment 	<ul style="list-style-type: none"> • State annual report • Exception reports filed within 45 days of shipment • Federal biennial reports

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Preparedness and Prevention	No requirement	Same as LQG	<ul style="list-style-type: none"> • Manage HW to minimize possibility of release or emergency • Designate one or more emergency coordinators • Maintain emergency response equipment in working order • Maintain aisle space to allow access of emergency equipment • Familiarize local authorities and hospitals with facility and properties of HW
Emergency Response Information	No requirement	<ul style="list-style-type: none"> • Post the following by the telephone at location of HW generation or accumulation: <ul style="list-style-type: none"> - Name and 24-hour phone number and address of all emergency coordinators - Location of fire extinguishers, alarms, and spill control equipment - Fire department phone number 	<ul style="list-style-type: none"> • Prepare and maintain contingency plan • Other extensive requirements; see regulations or contact DEQ
Shipping Requirements	<ul style="list-style-type: none"> • No specific RCRA requirements <ul style="list-style-type: none"> - Check with DOT - No manifest required - Shipped to licensed solid waste facility OR TSD facility OR LQG under control of the same person as the VSQG 	<ul style="list-style-type: none"> • Same as LQG, except: <ul style="list-style-type: none"> - Must ship waste within 180 days (270 days if TSD > 200 miles away) - May have tolling agreement with supplier 	<ul style="list-style-type: none"> • Must package, label, and placard HW in accordance with DOT requirements • Each container must be marked with: <ul style="list-style-type: none"> - Specific wording identifying contents as HW - Manifest number - Generator's name, address, and EPA ID number - EPA HW numbers • Use HW manifest • Use transporters and TSD facilities with EPA ID numbers • Ship waste within 90 days • Send LDR notification/certification
Training	No requirement	Employees must be familiar with proper waste handling and emergency procedures.	<ul style="list-style-type: none"> • Training by person qualified in HW management must be documented for each job title that handles HW. Training should cover: <ul style="list-style-type: none"> - Regulatory compliance - Emergency response - Emergency equipment • Include annual review
Records on File	No requirement	<ul style="list-style-type: none"> • State annual report • Exception letter filed ≤ 60 days of shipment 	<ul style="list-style-type: none"> • State annual report • Exception reports filed ≤ 45 days of shipment • Federal biennial reports
Episodic Generation	May be able to maintain VSQG status if planned or unplanned activity results in higher monthly generation. See the DEQ Episodic Generator Fact Sheet or 40 CFR Part 262 Subpart L.	May be able to maintain SQG status if planned or unplanned activity results in higher monthly generation. See the DEQ Episodic Generator Fact Sheet or 40 CFR Part 262 Subpart L.	Not applicable

For more information, contact the Idaho Department of Environmental Quality at (208)373-0502 or visit www.deq.idaho.gov. (Updated: April 2018)

Key to Abbreviations and Acronyms

AHW = acute hazardous waste	LDR = land disposal restrictions
DEQ = Department of Environmental Quality	LQG = large quantity generator
DOT = Department of Transportation	SQG = small quantity generator
EPA = Environmental Protection Agency	TSD = treatment, storage, or disposal facility
HW = hazardous waste	VSQG = very small quantity generator
	CFR = Code of Federal Regulations