The following is a summary of Hazardous Waste Generator requirements as applies to:

- Conditionally Exempt Small Quantity Generators (CESQGs) and Liquid Industrial By-Product (LIB) Generators
- Small Quantity Generators (SQGs)
- Large Quantity Generators (LQGs)

<table>
<thead>
<tr>
<th>Requirement For:</th>
<th>CESQG and Liquid Industrial By-Product</th>
<th>SQG</th>
<th>LQG</th>
</tr>
</thead>
<tbody>
<tr>
<td>Off-site treatment, storage or disposal destination for waste</td>
<td>Licensed solid waste disposal facility (solids); Liquid industrial by-product designated facility (liquids); licensed or exempt recycler; licensed hazardous waste facility. Also, universal waste handler or universal waste destination facility for hazardous waste managed as universal waste.</td>
<td>Licensed hazardous waste facility; or exempt hazardous waste recycling facility. Also, universal waste handler or universal waste destination facility for hazardous waste managed as universal waste.</td>
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</tr>
<tr>
<td>Maximum Time Period Before Waste Must be Shipped</td>
<td>No time limit if 2,200 pounds of non-acute hazardous waste is not exceeded.</td>
<td>180 days, unless shipping over 200 miles, then 270 days. Storage beyond time period requires a hazardous waste license for storage.</td>
<td>90 days and storage beyond time period requires a hazardous waste license for storage unless meeting Rule 306(7)</td>
</tr>
<tr>
<td>Maximum Amount Of Hazardous Waste That Can Be Accumulated On-site</td>
<td>2,200 pounds non-acute and/or 2.2 pounds or less acute. If exceed 2,200 pounds non-acute, subject to SQG requirements. If exceed 2.2 pounds acute, subject to LQG requirements.</td>
<td>13,200 pounds non-acute and/or 2.2 pounds or less acute. If exceed 13,200 pounds non-acute, requires a hazardous waste license for storage. If exceed 2.2 pounds acute, subject to LQG requirements.</td>
<td>No maximum amount</td>
</tr>
<tr>
<td>On-site Treatment Disposal, and Waste Analysis Plan</td>
<td>CESQGs can treat on-site and are not subject to Rule 503. Facilities with waste discharges to a POTW (municipal sanitary sewer system authorized under the Clean Water Act) may need wastewater operator certification depending on process, require POTW approval for discharge, and require records of disposal.</td>
<td>On-site treatment is allowed without a hazardous waste license if conditions in Rule 503 or Rule 206 of the Part 111 rules are met. Facilities with waste discharges to a POTW may need wastewater operator certification depending on process, require POTW approval for discharge, and require records of disposal. SQGs doing on-site treatment must have Waste Analysis Plan and keep records to meet Land Disposal Restrictions.</td>
<td>On-site treatment is allowed without a hazardous waste license if conditions in Rule 503 or Rule 206 of the Part 111 rules are met. Facilities with waste discharges to a POTW may need wastewater operator certification depending on process, require POTW approval for discharge, and require records of disposal. LQGs doing on-site treatment must have Waste Analysis Plan and keep records to meet Land Disposal Restrictions.</td>
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<tr>
<td>Site/EPA Identification Number</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Weekly Accumulation Area Inspections</td>
<td>No, and recommend meet SQG requirements. May be subject to other regulations depending on waste</td>
<td>Yes, and recommend written inspection logs</td>
<td>Yes, and written inspection logs required</td>
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<tr>
<td>Labeling Requirements</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Secondary Containment Requirements</td>
<td>No</td>
<td>Yes, if ever accumulate 2,200 lbs. or more at any time</td>
<td>Yes</td>
</tr>
<tr>
<td>Air Emissions Control for Volatile Organic Compounds Hazardous Wastes</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Uniform Hazardous Waste Manifest or Shipping Document</td>
<td>No - Shipping document required if liquid and manifest is optional. USDOT shipping document requirements must also be met if offering a USDOT hazardous material</td>
<td>Yes - Manifest required, unless SQG meets tolling agreement. USDOT shipping document requirements must also be met if offering a USDOT hazardous material</td>
<td>Yes - Manifest required. USDOT shipping document requirements must also be met if offering a USDOT hazardous material</td>
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<tr>
<td>Land Disposal Restriction Records</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Contingency plan</td>
<td>No - meeting SQG requirements is recommended. USDOT security plan if shipping excess of 1000 pounds hazardous waste</td>
<td>Yes - Basic plan and emergency posting by phones required. U.S. DOT security plan if shipping excess of 1000 pounds hazardous waste</td>
<td>Yes - Written plan required. USDOT security plan if shipping excess of 1000 pounds hazardous waste</td>
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<td>Emergency procedures</td>
<td>No - meeting SQG requirements is recommended</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Personnel training</td>
<td>No - meeting SQG requirements is recommended. USDOT training required when shipping hazardous waste. MIOSHA training may also be required.</td>
<td>Yes – Basic training required. USDOT training required when shipping hazardous waste. MIOSHA training may also be required.</td>
<td>Yes – written documentation also required. USDOT training required when shipping hazardous waste. MIOSHA training may also be required.</td>
</tr>
<tr>
<td>Requirements to use Permitted and Registered Transporter</td>
<td>Self-haul option or permitted and registered transporter if liquid</td>
<td>Permitted and registered transporter</td>
<td>Permitted and registered transporter</td>
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<tr>
<td>Waste minimization requirements</td>
<td>Meeting SQG requirements is recommended</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Annual Handler and Manifest User Fees</td>
<td>No</td>
<td>$100 user charge $8.00/manifest used for hazardous waste shipments in the calendar year</td>
<td>$400 user charge when generates &lt; 900,000 kg in calendar year; OR $1000 user charge when generates &gt; 900,000 kg in the calendar year AND $8.00/manifest used for hazardous waste</td>
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<td>Hazardous Waste/Biennial Report</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
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<td><strong>Used Oil Biennial Report</strong></td>
<td>Not required for generators. Used oil processors, re-refiners, and transfer facilities storing used oil more than 35 days are required to submit used oil biennial reports by March 1 of each even numbered year that covers the previous calendar year’s activities.</td>
<td>Not required for generators. Used oil processors, re-refiners, and transfer facilities storing used oil more than 35 days are required to submit used oil biennial reports by March 1 of each even numbered year that covers the previous calendar year’s activities.</td>
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<td>See Summary</td>
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<tr>
<td><strong>USDOT Transport Requirements</strong></td>
<td>Yes, when required by US DOT</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td><strong>Closure of Accumulation Areas</strong></td>
<td>Meet Part 201 of Act 451 Cleanup Requirements</td>
<td>Meet requirements in 40 CFR Parts 265.111 and 265.114. Decontaminate and remove all contaminated equipment, structures, and soil, and minimize the need for further maintenance of site. Meet unit-specific closure standards for tanks, containment buildings, and drip pads. Also meet Part 201 of Act 451 cleanup requirements</td>
<td>Meet requirements in 40 CFR Parts 265.111 and 265.114. Decontaminate and remove all contaminated equipment, structures, and soil, and minimize the need for further maintenance of site. Meet unit-specific closure standards for tanks, containment buildings, and drip pads. Also meet Part 201 of Act 451 cleanup requirements</td>
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