



HAZARDOUS WASTE GENERATOR CATEGORY AND SUMMARY ACCUMULATION REQUIREMENTS

GUIDANCE

The following is a summary of hazardous waste generator categories and requirements that apply to:

- Very Small Quantity Generators (VSQGs)
- Small Quantity Generators (SQGs)
- Large Quantity Generators (LQGs)

HAZARDOUS WASTE GENERATOR CATEGORIES

Generator Category	Maximum amount of nonacute hazardous waste generated per month	Approximate maximum volume of nonacute hazardous waste generated per month	Maximum amount of acute or severely toxic hazardous waste generated per month	Maximum amount of contaminated soil, water or other debris from clean-up of acute or severely toxic hazardous waste generated per month
VSQGs	≤ 100 kilograms (220 lbs.)	≤ half a 55-gallon drum or ≤ 25 gallons	≤ 1 kilogram (2.2 lbs.)	≤ 100 kilograms
SQGs	> 100 kilograms (220 lbs.) but < 1,000 kilograms (2,200 lbs.)	> half a 55-gallon drum and < five 55-gallon drums or >25 gallons and < 250 gallons	≤ 1 kilogram (2.2 lbs.)	≤ 100 kilograms (220 lbs.)
LQGs	≥ 1,000 kilograms (2,200 lbs.)	≥ five 55-gallon drums or ≥ 250 gallons	> 1 kilogram (2.2 lbs.)	> 100 kilograms (220 lbs.)

Generator category is determined using the limits in the Hazardous Waste Generator Category table above from Rule 303 of the [Part 111 Rules](#). If acute or severely toxic hazardous waste and nonacute hazardous waste are generated in the same calendar month, count separately the total amount of nonacute hazardous waste; the total amount of acute hazardous waste; the total amount of severely toxic hazardous waste; and contaminated soil, water, or other debris from clean-up of acute or severely toxic hazardous waste generated in the calendar month, and compare the amounts to the generator categories found in the table above. Make sure all hazardous waste generated across the site has been accurately [characterized](#) and included when determining generator status, including any waste treated on-site.

HAZARDOUS WASTE GENERATOR ACCUMULATION REQUIREMENTS

Requirement	VSQGs	SQGs	LQGs
Acceptable off-site treatment, storage or disposal destination for waste	Licensed solid waste disposal facility (solids), liquid industrial by-product designated facility (liquids), licensed or exempt recycler, licensed hazardous waste facility, or LQG under the control of the same person as the VSQG. Also, universal waste handler or destination facility for hazardous waste managed as universal waste.	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.	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.
Maximum time period before waste must be shipped off-site	No time limit if accumulation of 1,000 kilograms (2,200 lbs.) of nonacute, 1 kilogram (2.2 lbs.) of acute or severely toxic, and 100 kilograms (220 lbs.) of contaminated soil, water, or other debris from clean-up of acute or severely toxic is never exceeded.	180 days, unless shipping over 200 miles, then 270 days. Storage beyond this time period requires a hazardous waste license unless an extension meeting Rule 306(3) or (4) has been granted by EGLE under Part 111 Rules.	90 days. Storage beyond this time period requires a hazardous waste license. unless an extension meeting Rule 307(1)(a) has been granted by EGLE under the Part 111 Rules.

SUMMARY OF HAZARDOUS WASTE GENERATOR REQUIREMENTS – GUIDANCE

Requirement	VSQGs	SQGs	LQGs
<p>Maximum amount of hazardous waste that can be <i>accumulated</i> on-site</p>	<p>1,000 kilograms (2,200 lbs.) of nonacute, 1 kilogram (2.2 lbs.) of acute or severely toxic, and 100 kilograms (220 lbs.) of contaminated soil, water or other debris from the clean-up of acute or severely toxic.</p> <p>If >1,000 kilograms (2,200 lbs.) nonacute, subject to SQG requirements unless the site meets Rule 316 episodic generator requirements under the Part 111 Rules.</p> <p>If >1 kilogram (2.2 lbs.) of acute or severely toxic or if exceed 100 kilograms (220 lbs.) of contaminated soil, water or other debris from clean-up of acute or severely toxic hazardous waste generated per month, subject to LQG requirements, unless the site meets the Rule 316 episodic generator requirements under the Part 111 Rules.</p>	<p>6,000 kilograms (13,200 lbs.) of nonacute, 1 kilogram (2.2 lbs.) of acute or severely toxic, and 100 kilograms (220 lbs.) of contaminated soil, water, or other debris from the clean-up of acute or severely toxic.</p> <p>If >6,000 kilograms (13,200 lbs.) nonacute, requires a hazardous waste license for storage.</p> <p>If >1 kilogram (2.2 lbs.) acute or severely toxic, or 100 kilograms (220 lbs.) for contaminated soil, water, or other media from the clean-up of acute or severely toxic, subject to LQG requirements, unless the site meets Rule 316 episodic generator requirements under Part 111 Rules.</p>	<p>No maximum amount.</p>
<p>On-site treatment, disposal, and waste analysis plan</p>	<p>VSQGs can treat on-site and are not subject to Rule 503 of the Part 111 Rules. Facilities with waste discharges to a municipal sanitary sewer system authorized under the Clean Water Act (CWA) by the receiving facility may require records of disposal and need wastewater operator certification depending on process.</p>	<p>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 municipal sanitary sewer system authorized under the CWA by the receiving facility may require records of disposal and need wastewater operator certification depending on process. SQGs doing on-site treatment must have a Waste Analysis Plan and keep records to meet Land Disposal Restrictions.</p>	<p>On-site treatment 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 municipal sanitary sewer system authorized under CWA by the receiving facility may require records of disposal and need wastewater operator certification depending on process. LQGs doing on-site treatment must have a Waste Analysis Plan and keep records to meet Land Disposal Restrictions.</p>

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Requirement	VSQGs	SQGs	LQGs
Notification and Site/EPA identification number	No, unless the site has an episodic generating event and uses Rule 316 of the Part 111 Rules to maintain the VSQG category.	Yes, and starting 2021, renotification is required every four years.	Yes, and renotification is required during Biennial Reporting every even numbered year.
Accumulation area inspections	No, but recommend meet SQG requirements. May be subject to other regulations depending on waste.	Yes, weekly container and tank inspections required along with written inspection log.	Yes, weekly container and daily tank inspections required along with written inspection logs.
Labeling requirements	Yes	Yes	Yes
Secondary containment requirements	No	Yes, if ever accumulate 1,000 kilograms (2,200 lbs.) or more at any time.	Yes
Air emissions control for volatile organic compounds hazardous wastes	No	No	Yes
Uniform Hazardous Waste Manifest	No - Shipping document is required for VSQG liquids. This includes VSQG liquids shipped to controlling LQG for consolidation. Manifests are optional. A manifest is required for VSQGs liquids managed as an episodic generating event under Rule 316 of the Part 111 Rules. US Department of Transportation (US DOT) shipping document requirements must also be met if shipping a US DOT hazardous material.	Yes – Manifest required, unless SQG meets tolling agreement. US DOT shipping document requirements must also be met if offering a US DOT hazardous material.	Yes – Manifest required. US DOT shipping document requirements must also be met if offering a US DOT hazardous material.
Land disposal restriction records	No	Yes	Yes

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Requirement	VSQGs	SQGs	LQGs
Contingency plan	No - Meeting SQG requirements is recommended. US DOT security plan may be required. Refer to 49 CFR 172.800 for specific security plan requirements.	Yes - Written plan required and emergency arrangements with local responders must be documented. Plan quick reference guide recommended. Basic plan and emergency posting by phones and/or hazardous waste handling areas is required. US DOT Security Plan may be required. Refer to 49 CFR 172.800 for specific security plan requirements.	Yes - Written plan required and emergency arrangements with local responders must be documented. Plan requires a quick reference guide. US DOT Security Plan may be required. Refer to 49 CFR 172.800 for specific security plan requirements.
Emergency procedures	No - Meeting SQG requirements is recommended.	Yes	Yes
Personnel training	No - Meeting SQG requirements is recommended. US DOT training required when shipping hazardous waste. Michigan Occupational Safety and Health Administration (MIOSHA) training may also be required.	Yes - Basic training required and must be documented. US DOT training required when shipping hazardous waste. MIOSHA training may also be required.	Yes - Extensive training required annually, and training must be documented. US DOT training required when shipping hazardous waste. MIOSHA training may also be required.
Requirements to use licensed and registered transporter	Self-haul option or licensed and registered transporter of liquid industrial by-products.	Licensed and registered hazardous waste transporter.	Licensed and registered hazardous waste transporter.
Waste minimization requirements	No - Meeting SQG requirements recommended.	Yes	Yes
Annual handler fees	No, unless site has an episodic event subject to Rule 316 of the Part 111 Rules.	\$100 user charge, unless experience an episodic event subject to Rule 316 of the Part 111 Rules, then \$400.	\$400 user charge when generates < 900,000 kilograms in calendar year; OR \$1,000 user charge when generates ≥ 900,000 kilograms in the calendar year

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Requirement	VSQGs	SQGs	LQGs
Hazardous waste/biennial report	No	No.	Yes, LQGs consolidating VSQG waste must also report consolidation activities.
Used Oil Biennial Report See summary	Not required for VSQGs. 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.	Not required for SQGs. 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.	Not required for LQGs. 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.
Annual import/export report	Yes, for hazardous and universal wastes.	Yes, for hazardous and universal wastes.	Yes, for hazardous and universal wastes.
US DOT transport requirements	Yes, when required by US DOT.	Yes	Yes
Closure of accumulation areas	Yes – Meet Part 201 of Act 451 cleanup requirements.	Yes – Must remove all hazardous waste from tanks, discharge control equipment, and discharge confinement structures and manage it as a hazardous waste. Meet cleanup standard authorized under Part 111 of Act 451.	Yes – Notification required 30 days prior to closing and 90 days after closing to certify that closure performance standards that were achieved. Meet cleanup standards authorized under Part 111 of Act 451.

¹ May also be subject to other emergency planning and training regulations

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