



MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
Materials Management Division

## Very Small Quantity Generator Inspection Form

Under the Authority of Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial By-Products, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and Title 40 of the Code of Federal Regulations (CFR) 262, Standards Applicable to Generators of Hazardous Waste

This document is used by EGLE inspectors and waste generators to determine compliance with Part 111 and Part 121.

Facility Name: \_\_\_\_\_

Inspection Date: \_\_\_\_\_ Site ID# \_\_\_\_\_ WDS#: \_\_\_\_\_

The following checked sections are included for this inspection, if not check left intentionally blank:

- Section 1 - Waste & Generator Determination/Records
- Section 2 - Mixing Hazardous with Solid Waste  
Hazardous Waste Treatment & Disposal
- Section 3 - Transport & Shipping
- Section 4 - Accumulation of Hazardous Waste
- Section 5 - Episodic Generation

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**Section 1 - Waste & Generator Determination/Records**

HAZARDOUS WASTE GENERATED	SOURCE	AMOUNT

C - Compliant; NC - Not Compliant; NI - Not Inspected; N/A - Not Applicable

CITATION(S)	WDS	WASTE & GENERATOR DETERMINATION/RECORDS (Part 111 & Part 121 & CFR 262)	C	NC	NI	NA
R 302 Sec 12103(1)(a)	261A	Generator complies with waste determination requirements and maintains records of characterization				
Sec 12103(3)	LBG	Generator retains all records for a period of at least three years and makes readily available for review				
R 303(1)	262A	Generator generates ≤ 100 kilograms (kg) (~220 pounds) of non-acute hazardous waste or ≤ one kg (~2.2 pounds) of acute hazardous waste or severely toxic waste per calendar month				

NOTE: The generator may determine if the waste meets one or more of the characteristics of hazardous waste by applying knowledge and/or testing the waste.

NOTE: Part 121 requirements apply to liquid hazardous waste generated by a Very Small Quantity Generator (VSQG).

NOTE: VSQGs do not need to maintain characterization records for solid hazardous waste.

NOTE: If the generator accumulates > one kg of acute hazardous waste; > 1 kg of severely toxic hazardous waste; or > than 100 kgs (~220 pounds) of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute or severely toxic hazardous waste listed, the waste cannot remain on-site for more than 90 days beginning on the date that the amount was exceeded (Rule 304 (1)(c)). The generator is a Large Quantity Generator (LQG) subject to Rule 307, and the LQG Inspection Form should be used.

NOTE: If the generator accumulates at any time > 1,000 kgs of non-acute hazardous waste, all quantities of that hazardous waste are subject to the following additional conditions for exemption: 1) the waste is held on-site for no more than 180 days, or 270-days, if applicable, beginning on the date the amount was exceeded, 2) the quantity of waste accumulated on-site

never exceeds 6,000 kgs, and 3) the Episodic Generator provisions below are met (Rule 304 (1)(d)(i-iii)).

NOTE: VSQGs are not required to obtain an Environmental Protection Agency (EPA) Identification number unless an episodic event occurs.

Comments/Notes:

**Section 2 - Mixing Hazardous with Solid Waste and Hazardous Waste Treatment & Disposal**

C - Compliant; NC - Not Compliant; NI - Not Inspected; N/A - Not Applicable

CITATION(S)	WDS	MIXING HAZARDOUS WASTE WITH SOLID WASTE (Part 111 & 40 CFR 262)	C	NC	NI	NA
R 303(7)	262A	Generator ensured that mixtures of hazardous waste and other waste do not exhibit any characteristics of hazardous waste				
R 303(7)	262A	Generator ensured that mixtures of hazardous waste and used oil do not contain halogenated solvents				

NOTE: A mixture of VSQG hazardous waste with nonhazardous waste remains exempt if the resulting mixture does not exhibit a characteristic. If the resulting mixture exhibits a characteristic of hazardous waste, the resultant mixture is a newly generated hazardous waste and must be counted (Rule 303).

NOTE: A mixture of VSQG hazardous waste with used oil (except a mixture of used oil and halogenated hazardous waste) may be managed as used oil (Rule 809 (2)(a); 40 CFR, 262.13(f)(1)(iii) and 40 CFR, 279.10(b)(3)).

Comments/Notes:

CITATION(S)	WDS	HAZARDOUS WASTE TREATMENT & DISPOSAL (Part 111 & 40 CFR 262)	C	NC	NI	NA
R 304(1)(e)	262C	Generator treats or disposes of its hazardous waste in an on-site facility				
R 304(1)(e)	262C	Generator ensures delivery to an off-site treatment, storage, or disposal facility (TSDF)				

NOTE:

- VSQG waste may be disposed of at a Michigan licensed Part 115 landfill, Michigan Part 121 designated facility, Michigan permitted Part 31 facility, Michigan licensed TSDF, or out of state licensed facility.
- A LQG under the control of the same person as the VSQG,

List EPA ID and disposal facilities used:


- Universal waste be managed by a universal waste handler or destination facility.

NOTE:

If the hazardous waste is sent to a LQG under the same ownership, the generator must 1) mark each container of hazardous waste with the words "Hazardous Waste" and 2) mark each container of hazardous waste with the hazardous waste number and an indication of the hazards of the contents. Additionally, transport and shipping document requirements under Part 121 must be followed. **VSQG episodic hazardous waste is not eligible for LQG consolidation.**

NOTE: If accepting VSQG liquids, the LQG must also notify the Department of Environment, Great Lakes, and Energy (EGLE) of the liquid industrial by-products designated facility activity at the site.

Comments/Notes:

### Section 3 - Transport & Shipping

C - Compliant; NC - Not Compliant; NI - Not Inspected; N/A - Not Applicable

CITATION(S)	WDS	TRANSPORT AND SHIPPING (Part 121)	C	NC	NI	NA
Sec 12103(1)(c)	LBG	Generator used a permitted and registered liquid industrial by-products transporter for liquid hazardous waste				
Sec 12103(1)(d)	LBG	<input type="checkbox"/> Separate shipping document <b>OR</b> <input type="checkbox"/> Consolidated shipping document				
Sec 12102(f) (i through v)	LBG	Shipping document included the following information: <input type="checkbox"/> Name and address of the generator (i) <input type="checkbox"/> The name of the transporter (ii) <input type="checkbox"/> The type and quantity of material accepted from the generator (iii) <input type="checkbox"/> The date of pick up (iv) <input type="checkbox"/> The name, address, and site identification number of the designated facility (v)				
Sec 1203(1)(e)	LBG	Generator certified at the time of pick up that the liquid hazardous waste is fully and accurately described on the shipping document and in proper condition for transport, and that the information contained on the shipping document is factual				
Sec 1203(1)(f)	LBG	Generator provided transporter with a copy of the shipping document to accompany the liquid industrial waste to designated facility				
Sec 12103(1)(g)	LBG	Generator received confirmation of acceptance from the designated facility				

NOTE: Shipping documentation is not required for disposal of VSQG solid hazardous waste. However, shipping documents are recommended for VSQG solids to verify proper handling and disposal, and for tracking any LQG consolidation activities. If VSQG solid hazardous waste is disposed of at a landfill, the VSQG must maintain the landfill waste profile approval, as part of the waste characterization record, to verify the landfill disposal was a legitimate disposal option for the VSQG solid hazardous waste.

Comments/Notes:

**Section 4 - Accumulation of Hazardous Waste**

(C - Compliant; NC - Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	ACCUMULATION OF HAZARDOUS WASTE (Part 111 & Part 121)	C	NC	NI	NA
R 304(1)(f) Sec 12113(1)	262C	Generator accumulates waste in an area where the waste is protected from weather, fire, physical damage, and vandals				
Rule 304(1)(g)	262C	The hazardous waste accumulation is conducted so that hazardous waste or hazardous waste constituents cannot escape by gravity into the soils, directly or indirectly, into surface or groundwaters, or into drains or sewers, and so that fugitive emissions are not in violation of Part 55, Air Pollution Control, of the NREPA				
Sec 12103(1)(b)	LBG	Generator maintains labeling or marking to identify contents of containers or tanks for liquid hazardous waste				
Sec 12113(1)	LBG	All vehicles, containers, and tanks used to hold liquid hazardous waste shall be closed or covered, except when necessary to add or remove material				
Sec 12113(1)	LBG	The exterior of all vehicles, containers and tanks are kept free of material and residue				

Comments/Notes:

## Section 5 - Episodic Generation

(C - Compliant; NC - Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	EPISODIC GENERATION (Part 111 & 40 CFR 262)	C	NC	NI	NA
R 316(2)(b)	262C	Generator notified the EGLE Director no more than 30-calendar days prior to initiating a <b>planned episodic</b> event using form EQP5150				
R 316(2)(b)	262C	Generator notified the EGLE Director via phone, e-mail, or fax within 72 hours of an <b>unplanned episodic</b> event, using form EQP5150				
R 316(2)(b)	262C	Generator included the following in the notification: <input type="checkbox"/> The start date and end date of the episodic event <input type="checkbox"/> The reason(s) for the event <input type="checkbox"/> The types and estimated quantities of hazardous waste expected to be generated as a result of the episodic event <input type="checkbox"/> The facility contact and emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to an emergency in compliance with Rule 306(1)(n)				
R 316(2)(c)	262C	Generator obtained an EPA identification number				
R316(2)(e)(i)(B) (I-III)	262C	Generator labeled/marked containers with the following: <input type="checkbox"/> The words “Episodic Hazardous Waste” (R 316 (2)(e)(i)(B)(I)) <input type="checkbox"/> An description of the waste <b>and</b> an indication of the hazards of the contents (R 316 (2)(e)(i)(B)(II)) <input type="checkbox"/> The date the episodic event began (R 316 (2)(e)(i)(B)(III))				
R 316(2)(e)(ii)	262C	If waste was accumulated in tanks, generator complied with the following: <input type="checkbox"/> Labeled or marked tank with the words “Episodic Hazardous Waste” (R 316 (2)(e)(i) (B)(ii)(B)(I)) <input type="checkbox"/> Labeled or marked tank with a description of the waste <b>and</b> an indication of the hazards of the contents (R 316 (2)(e)(ii)(B)(II)) <input type="checkbox"/> Used inventory logs, monitoring equipment or other records to identify the date upon which each episodic event begins (R 316 (2)(e)(ii)(C))				

CITATION(S)	WDS	EPISODIC GENERATION (Part 111 & 40 CFR 262)	C	NC	NI	NA
		<input type="checkbox"/> Kept inventory logs or records with the above information on-site and readily available for review (R 316 (2)(e)(ii)(D))				
R 316 (2)(e)(iii)	262C	Generator ensured that hazardous waste was managed in a manner that minimizes the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to the air, soil, or water, which could threaten human health or the environment				
R 316(2)(f)	262C	Generator complied with the hazardous waste manifest requirements				
R 316(2)(g)	262C	Generator maintained all the following records for three years from the end date of the episodic event: <ul style="list-style-type: none"> <li><input type="checkbox"/> The beginning and end dates of the episodic event (Rule 316 (2)(g)(i))</li> <li><input type="checkbox"/> A description of the episodic event (Rule 316 (2)(g)(ii))</li> <li><input type="checkbox"/> A description of the types and quantities of hazardous waste(s) generated during the episodic event (Rule 316 (2)(g)(iii))</li> <li><input type="checkbox"/> A description of how the hazardous waste was managed, as well as the name of the designated facility that received the hazardous waste (Rule 316 (2)(g)(iv))</li> <li><input type="checkbox"/> The name of hazardous waste transporters (Rule 316 (2)(g)(v))</li> <li><input type="checkbox"/> An approval letter from the EGLE Director if the generator petitioned to conduct one additional episodic event per calendar year (Rule 316 (2)(g)(vi))</li> </ul>				

NOTE: VSQGs are limited to one episodic event per calendar year; however, the generator may petition EGLE for a second episodic event. The second episodic event cannot be the same as the first episodic event (if the first event was planned, the second must be unplanned and vice versa) (Rule 316(2)(a)).

NOTE Hazardous waste managed as part of an episodic event does not have to be counted toward a generator's category (40 CFR, 262.13(c)(8)).

NOTE: Treatment is not allowed by VSQGs (except in on-site elementary neutralization unit) (Rule 103(e)(i-ii); 40 CFR 262.10).

NOTE: Hazardous wastes on drip pads and in containment buildings cannot be managed under Subpart L (Rule 316(2)(d)).

NOTE: An indication of the hazards of the contents may include the applicable hazardous waste characteristic or characteristic(s); the hazard communication consistent with 49 CFR part 172, subpart E or F; a hazard statement or pictogram consistent with 29 CFR 1910.1200; or a chemical hazard label consistent with the NFPA standard no. 704.

NOTE: The generator has up to 60-calendar days from the start of the episodic event to manifest and send its hazardous waste generated from the episodic event to a designated facility. If the 60-calendar days is exceeded, that waste counts towards the generator's category and must be managed under the regulations for that generator category.

Comments/Notes: