

Very Small Quantity Hazardous Waste Generators

Guidance

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Introduction

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division oversees hazardous waste handling across Michigan to ensure it is managed properly and in a manner that protects public health and our environment. Hazardous waste includes both characteristic and listed hazardous wastes as defined in [Part 111](#), Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451 (NREPA), as amended (Part 111), in the [Part 111 rules](#) (see Identification and Listing of Hazardous Waste), and in the corresponding regulations found in the federal Resource Conservation and Recovery Act (RCRA) 40 CFR Part 261, which are summarized in the [Waste Characterization and Generator Category](#) guidance.

This guidance 1) provides the definition of a very small quantity generator (VSQG) of hazardous waste, 2) summarizes the VSQG requirements found under Rule 304 of Part 111 rules; 3) summarizes the VSQG episodic generator requirements found under Rule 316 of the Part 111 rules; and 4) summarizes the requirements that apply to VSQG liquids (liquid hazardous waste) under Part 121, Liquid Industrial By-Products, of the NREPA.

VSQG Hazardous Waste Definition

A VSQG generates less than or equal to the following amounts of hazardous waste in a calendar month:

- 100 kilogram (kg) (220 pounds) of nonacute hazardous waste or roughly 25 gallons or less depending on the density of the hazardous waste.
- 1 kg (2.2 pounds) of acute hazardous waste.
- 1 kg (2.2 pounds) of severely toxic hazardous waste.
- 100 kg (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 hazardous waste or severely toxic hazardous waste.



NOTE: Acute hazardous wastes include P-listed wastes in Table 205a of the [Part 111 rules](#) and wastes that have an (H) in the hazard code column to the right of the waste description in Table 203a of the Part 111 rules. Severely toxic hazardous wastes have an “S” in their waste number and are listed in Table 202 of the Part 111 rules.

When evaluating a site’s hazardous waste generator category, generators must count all of the hazardous waste generated across the entire site. Generators should not count hazardous waste managed under the universal waste requirements, used oil that is being recycled, or other non-hazardous liquid industrial by-products. For more information about managing those materials, the [Universal Waste](#), [Used Oil](#) and [Liquid Industrial By-Products Generator](#) guidance documents.

Generators who generate acute or severely toxic hazardous waste and nonacute hazardous waste in the same calendar month must determine the generator category by counting separately the total amount of acute hazardous waste, severely toxic hazardous waste, and nonacute hazardous waste generated in the calendar month. See the [Waste Characterization and Generator Category](#) guidance for additional details.

Hazardous waste that is managed as part of an episodic event in compliance with Part 111 is also exempt from being counted. Episodic events are discussed further in this document.

VSQG Waste Exemptions

VSQGs may mix their hazardous waste with nonhazardous wastes. This mixture is exempt from being counted 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. VSQGs may also mix hazardous waste with used oil and manage the mixture as used oil with the exception of a mixture of used oil and halogenated hazardous waste.

VSQG Characterization and Generator Category Requirements

VSQGs are required to comply with the following characterization and generator category requirements:

- [Characterize](#) all waste streams and keep records of the determination for at least three years. 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.
- Maintain information to support the VSQG monthly generator status determination for at least three years.

VSQG Hazardous Waste Accumulation Limits

VSQGs do not have accumulation time limits; however, they do have the following accumulation quantity limits:

- Nonacute hazardous waste: If a VSQG accumulates > 1,000 kg (2,220 pounds) of nonacute hazardous waste, the VSQG must manage the waste under the conditions for a small quantity generator (SQG) unless the VSQG hazardous waste is managed to meet the episodic event requirements discussed later in this document. The 180-day accumulation time period begins when the onsite accumulation equals or exceeds 1,000 kg (2,200 pounds) of nonacute hazardous waste, unless the VSQG hazardous waste is managed to meet the episodic event requirements discussed later in this document.

If a VSQG accumulates > 6,000 kg (13,200 pounds) of nonacute hazardous waste, the VSQG does not meet the exemption, and it is an unlicensed storage site. If an accumulation is expected to exceed 6,000 kg (13,200 pounds) of nonacute hazardous waste, the site must meet the large quantity generator (LQG) requirements before the site exceeds any of the LQG

limits for nonacute hazardous waste, unless the VSQG hazardous waste is managed to meet the episodic event requirements discussed later in this document. The beginning of the 90-day accumulation time period is when the onsite accumulation exceeds 1,000 kg (2,200 lbs.) of nonacute hazardous waste.

- Acute or severely toxic hazardous waste: If a VSQG accumulates > 1 kg (2.2 pounds) of acute or severely toxic hazardous waste, the VSQG must manage the waste under the conditions for a LQG, unless the VSQG hazardous waste is managed to meet the episodic event requirements discussed later in this document. The beginning of the 90-day accumulation time limit begins when onsite accumulation exceeds 1 kg (2.2 pounds) of acute or severely toxic hazardous waste.
- Cleanup residues from spills of acute or severely toxic hazardous waste: If a VSQG accumulates > 100 kg (220 pounds) of cleanup residue from spills of acute hazardous waste, the VSQG must manage the waste under the conditions for an LQG, unless the VSQG hazardous waste is managed to meet the episodic event requirements discussed later in this document. The beginning of the 90-day accumulation time limit is when onsite accumulation exceeds 100 kg (220 pounds) of cleanup residues from spills of acute hazardous waste.

Generator accumulation beyond the SQG or LQG timelines require a hazardous waste storage license. See the [Summary of Hazardous Waste Generator Accumulation Requirements](#) for details on the additional requirements SQGs and LQGs must meet.

VSQG Accumulation Requirements

VSQGs are required to comply with the following accumulation requirements:

- Accumulate the VSQG hazardous waste in containers or tanks that are in good condition, compatible with the waste, kept closed except when adding or removing waste, and free of any liquids or residues on the exterior of the containers and tanks.
- Label each container or tank of hazardous waste with a description of the waste. Examples include “used oil,” “spent antifreeze,” “paint waste,” or “spent solvent.”
- Accumulate the VSQG hazardous waste in an area that is protected from weather, fire, physical damage, and vandals and in a manner that prevents hazardous waste or hazardous waste constituents from escaping, directly or indirectly into soil, surface water, groundwater, drains, or sewers and so that fugitive emissions do not violate the air pollution control regulations under Part 55 of the NREPA.
- Ensure no hazardous wastes with free liquids are landfilled.

VSQG Hazardous Waste Disposal Options

A VSQG can treat or dispose of its hazardous waste in an on-site facility, if authorized under the NREPA, or it can ensure delivery to an off-site treatment, storage, or disposal facility that is one of the following:

1. A Michigan facility licensed under [Part 111](#) for that waste type or be operating under R 299.9502(3), (4), or (5).
2. An out-of-state facility authorized to manage hazardous waste by the state under a hazardous waste management program that is approved under 40 CFR Part 271.
3. An out-of-state facility permitted or licensed under 40 CFR Part 270.
4. An out-of-state interim status facility under 40 CFR Parts 270 and 265.
5. A Michigan facility that stores or treats the waste and that is in compliance with the applicable requirements of Parts 31, 55, 115, and 121 of the NREPA.
6. A Michigan facility that disposes of the waste and that is in compliance with the applicable requirements of Parts 31, 55, 115, and 121 of the NREPA.
7. An out-of-state facility that is permitted, licensed, or registered by that state to manage municipal waste that, if managed in a municipal waste landfill, is subject to 40 CFR Part 258.
8. An out-of-state facility that is permitted, licensed, or registered by that state to manage nonmunicipal waste that, if managed in a nonmunicipal waste disposal unit after the effective date of these rules, is subject to 40 CFR 257.5 to 257.30.
9. A facility that beneficially uses or reuses, or legitimately recycles or reclaims, the waste or treats the waste before the beneficial use or reuse or legitimate recycling or reclamation.
10. An off-site publicly owned treatment works, if the waste is in compliance with all federal, state, and local pretreatment requirements and, if the waste is shipped by vehicle, the conditions of R 299.9503(3)(b) are met.
11. For universal waste that is managed under Rule 228, a universal waste handler or universal waste destination facility.
12. An LQG under the control of the same person as the VSQG. Control means the company has the power to direct the policies of the generator, whether by the ownership of stock, voting rights, or otherwise. Contractors who operate generator facilities on behalf of a different person are not considered to "control" the generators.

Note: VSQGs are exempt from the land disposal restriction regulations when sending their waste to one of the treatment, storage, or disposal options listed above.

VSQG TRANSPORT REQUIREMENTS

When shipping VSQG liquids in Michigan, VSQGs must use a [permitted and registered liquid industrial by-products transporter](#) or self-transport the VSQG liquids. If self-transporting, VSQGs must do so safely in accordance with any United States Department of Transportation (USDOT) requirements that apply if the VSQG liquids were generated by the owner/operator transporting the waste and came from equipment that the owner/operator owns. An MCS90 insurance endorsement and Site Identification (ID) number are also required for self-transport.

The VSQG is required to document the transport of VSQG liquids using a shipping document that includes the following:

- VSQG name and address
- Date the VSQG liquids were shipped.
- Transporter name
- Receiving facility name and address.
- Type and volume of VSQG liquids shipped
- Receiving facility Site Identification (ID).

Both the VSQG and the transporter must certify the shipping document, verifying the information is accurate. Both the VSQG and transporter must maintain a copy of the shipping document for at least three years from the date of shipment. The receiving facility must notify the VSQG within a reasonable period of time that it received the shipment documented on the shipping document from the transporter. A record of the receiving facility notification must be maintained by the VSQG and the receiving facility for at least three years from the date of shipment.

For more information on documenting VSQG shipments, see the [Liquid Industrial By-Products Generator guidance](#) and [Liquid Industrial By-Products Frequently Asked Questions](#). 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 are 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. VSQG shipments from episodic events have alternate requirement discussed later in this document.

Controlling LQG Consolidation of VSQG Waste

When an LQG and a VSQG are under the control of the same person, the VSQG can send its hazardous waste to the LQG for consolidation and disposal as a hazardous waste. When using this option, the VSQG must:

- [Characterize](#) all waste streams and keep record of the determination for at least three years. Records obtained in this determination may include analytical results, safety data sheets, waste profile approval from a landfill, or other documentation such as product information from a supplier or manufacturer.
- Maintain information to support the VSQG monthly generator status determination for at least three years.

- Mark each container of hazardous waste with the words "Hazardous Waste."
- Mark each container of hazardous waste with a description of the waste or the hazardous waste number, and an indication of the hazards of the contents. The hazard indication options include marking it with the hazardous waste characteristic(s) (ignitable, toxic, corrosive, and/or reactive), the hazard communication consistent with USDOT regulations placards, a pictogram consistent with Global Harmonization Standards for worker protection, or markings consistent with the National Fire Protection Association chemical hazard labels.
- Accumulate the hazardous waste in an area protected from weather, fire, physical damage, and vandals and in a manner that prevents hazardous waste or hazardous waste constituents from escaping by gravity into the soils, directly or indirectly, into surface or groundwaters, or into drains or sewers and so that fugitive emissions do not violate the air pollution control regulations under Part 55 of the NREPA.
- Follow the VSQG transport and shipping document requirements noted above.
- Ensure no hazardous wastes with free liquids are landfilled.

When using this option, the LQG must:

- Notify EGLE of the VSQG hazardous waste consolidation activities using the [Site ID Form \(EQP5150 Form\)](#) at least 30 days prior to receiving the first shipment from the VSQG. If accepting VSQG liquids, the LQG must also notify EGLE of the liquid industrial by-products designated facility activity at the site.
- Label the container with the date accumulation starts, which is the date the hazardous waste was received from the VSQG.
- If the LQG consolidates incoming hazardous waste from a VSQG with its own hazardous waste in tanks or containers or with hazardous waste from other VSQGs, the LQG must label each container or tank with the earliest date any hazardous waste was placed in the container at the LQG location.
- Maintain adequate aisle space at all times for emergency personnel to access hazardous waste.
- Maintain records for each shipment that include the following details for at least three years:
 - the VSQG name
 - the VSQG site address
 - a VSQG contact, phone number, and e-mail
 - a description of the hazardous waste received
 - the quantity and the date the hazardous waste was received
- Manage consolidated waste as fully regulated LQG hazardous waste.
- Send the VSQG waste for final treatment or disposal at a licensed hazardous waste treatment, storage, or disposal facility within 90 days of the accumulation date.

- Use a permitted and licensed hazardous waste transporter.
- Document shipment for disposal on a Uniform Hazardous Waste Manifest.
- Report in the LQG's Biennial Report the types and quantities of hazardous wastes it has received from participating VSQGs. A different source code is used for the VSQG consolidated waste to distinguish from the LQG's own generated hazardous waste.

VSQG waste can be mixed with LQG waste or other VSQG waste as long as the wastes are compatible, it is managed to meet Rule 307 LQG exemption, and the consolidation (treatment) is performed to meet Rule 503(1)(i) generator treatment exemption. When VSQG waste is mixed with LQG waste or other VSQG waste, the 90-day waste accumulation clock starts on the earliest accumulation date for all of the waste that is consolidated.

There is no accumulation limit for how much waste can be consolidated at an LQG from VSQGs that they control. There are no quantity limitations to be eligible for shipments from the VSQG, but the VSQG must stay within its own accumulation and generation limits. If the VSQG and the LQG are in different states, both states must have adopted the consolidation provision for the activity to be authorized. If the hazardous waste is transported through states other than the VSQG and LQG home states, check to see if there are additional requirements in the other transit states to be sure all requirements are met for transport.

Note: VSQGs are not required to use a Uniform Hazardous Waste Manifest when sending the waste for consolidation to an LQG under the control of the same person. This does not eliminate the need to comply with USDOT requirements. Any shipment of hazardous waste that meets the definition of a hazardous material would be subject to USDOT's packaging, marking, labeling, placarding, and shipping paper requirements. See VSQG transport and shipments section above for additional transport and shipping details for VSQG shipments.

SQG Requirements for Planned and Unplanned Episodic Events

An episodic event is an activity or activities, either planned or unplanned, that does not normally occur during generator operations and that results in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category. Episodic events can be planned or unplanned. A clean out of a tank or laboratory, or a facility expansion would be considered planned episodic events. A spill caused by a flood, damaged equipment, or a product recall would be considered an unplanned episodic event. Increased production of hazardous waste due to an increased rate of production is not an episodic event.

A VSQG can maintain their existing generator category during a planned or unplanned episodic event if the site meets the requirements specified in Rule 316 of the Part 111 rules.

VSQGs that generate or accumulate greater than the 1 kg (2.2 pounds) of acute or severely toxic hazardous waste; generate greater than 100 kg (220 pounds) of acute hazardous waste; and/or accumulate more than 6,000 kg (13, 200 pounds) of non-acute hazardous waste, may also manage the acute hazardous waste as an episodic event and maintain their VSQG category.

In the event the episodic rules are not met and the VSQG generates or accumulates greater than 1.1 kg (2.2 pounds) of acute or severely toxic hazardous waste or accumulates greater than 6,000 kg (13,200 pounds) of non-acute hazardous waste, the site must meet the LQG requirements, or it is an unlicensed hazardous waste storage facility.

In the event that the episodic rules are not met and the VSQG generates more than 100 kg (220 pounds) but less than 1,000 kg (2,200 pounds) of non-acute hazardous waste and never accumulates more than 6,000 kg (13,200) pounds of non-acute hazardous waste, the site must meet the SQG requirements, or it is an unlicensed hazardous waste storage facility.

VSQGs must maintain records associated with the episodic event. 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 in the calendar year was planned, the second must be unplanned and vice versa).

VSQGs remain VSQGs if they meet the Rule 316 episodic requirements. When completing the initial [Site ID Form](#), there is a \$50 fee. VSQGs notifying for an episodic event are to notify as a VSQG and complete the addendum on Page 8 for the episodic event. When completing the form, notify EGLE of all of the regulated waste activities occurring at the site. EGLE will only accept a scanned, signed, fully completed form sent to EGLE-MMD-Site-ID-Reporting@Michigan.gov. It must be signed and dated by the person responsible for the site's hazardous waste activities. See the [Hazardous Waste Program Forms and License Application Web page](#) for additional details on completing and submitting the notification and paying the fee.

An episodic event cannot last more than 60 days beginning on the first day episodic hazardous waste is generated and concluding on the day the hazardous waste is removed from the generator's site. To maintain VSQG status during an episodic event, the VSQG must comply with the following, in addition to the VSQG requirements listed above:

- Notify EGLE of a planned episodic event at least 30 calendar days before the event using the Site ID Form. The notification must include the start date and end date of the episodic event, the reason(s) for the event, types and estimated quantities of hazardous waste expected to be generated as a result of the episodic event and shall identify a facility contact and emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to an emergency.
- Notify EGLE by phone, email, or fax within 72 hours of an unplanned episodic event, followed by written notification of the *unplanned episodic event* using the Michigan Site ID Form. The notification must include the start date and end date of the episodic event, the reason(s) for the event, types and estimated quantities of hazardous waste expected to be generated as a result of the episodic event and shall identify a facility contact and emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to an emergency.
- Obtain a Site ID number, which is issued in response to submittal of the Site ID Form.

- Accumulate hazardous waste in containers or tanks, not on drip pads or containment buildings.
- Containers and tanks must be in good condition and compatible with the hazardous waste therein.
- When accumulating hazardous waste in containers, the container must be marked or labeled with:
 - the words “Episodic Hazardous Waste,”
 - a description of the hazardous waste,
 - an indication of the hazards associated with the waste that could include marking it with the hazardous waste characteristic(s) (ignitable, toxic, corrosive, and/or reactive), the hazard communication consistent with the USDOT regulations placards, a pictogram consistent Global Harmonization Standard for worker protection, or markings consistent with the National Fire Protection Association chemical hazard labels, and
 - the date upon which the episodic event began.
- If the quantity of hazardous waste accumulated onsite ever exceeds 1,000 kilograms, accumulate the hazardous waste containers in an area that complies with the containment requirements of 40 CFR 264.175 and inspect the area weekly for leaks.
- When accumulating hazardous waste in tank(s), the hazardous waste tanks must be marked or labeled with:
 - the words "Episodic Hazardous Waste,"
 - a description of the hazardous waste, and
 - an indication of the hazards associated with the waste which could include marking it with the hazardous waste characteristic(s) (ignitable, toxic, corrosive, and/or reactive), the hazard communication consistent with the USDOT regulations placards, a pictogram consistent Global Harmonization Standard for worker protection, or markings consistent with the National Fire Protection Association chemical hazard labels.
- When accumulating hazardous waste in tank(s), the generator must use inventory logs, monitoring equipment, or other records to identify the date upon which each episodic event begins and keep the records on-site and readily available for inspection.
- Tanks must be inspected at least once each operating day to ensure all applicable discharge control equipment, such as waste feed cutoff systems, bypass systems, and drainage systems are in good working order and to ensure the tank is operated according to its design by reviewing the data gathered from monitoring equipment such as pressure and temperature gauges from the inspection.
- When accumulating hazardous waste in tank(s), ensure the tank(s) has full secondary containment and a leak detection system to alert personnel to leaks, or implement established workplace practices to ensure leaks are promptly identified.

- When accumulating hazardous waste in a tank(s), use inventory logs, monitoring equipment, or other records to identify the date upon which each episodic event begins and keep the records onsite and readily available for inspection.
- Manage the hazardous waste 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.
- Before transporting hazardous waste or offering hazardous waste for transportation off site, package, label and mark each package to meet any USDOT regulations that apply under 49 CFR Parts 172, 173, 178, and 179.
- Send the episodic hazardous waste for treatment, storage and/or disposal within 60 days of the start of the episodic event to a licensed hazardous waste disposal facility using both a Uniform Hazardous Waste Manifest and a permitted and registered hazardous waste transporter.
- Maintain the following records of the VSQG episodic event for at least three years from the end of the episodic event:
 - The beginning and end dates of the episodic event.
 - A description of the episodic event.
 - A description of the types and quantities of hazardous wastes generated during the event.
 - A description of how the hazardous waste was managed and the name of the hazardous waste designated facility that received the hazardous waste.
 - The name(s) of hazardous waste transporters.
 - An approval letter from EGLE, if the generator petitioned for a second event during the calendar year.

VSQG Best Management Practices

VSQGs should ensure there is sufficient aisle space for emergency response staff and equipment to respond to an emergency. Generally, one clear aisle at least three feet wide is needed to access the hazardous waste accumulation area. Secondary containment for VSQG hazardous waste is also recommended. This helps prevent spills and costly clean-up activities and enhances worker protection. Although VSQGs are not required to have an emergency response plan and procedures under the waste regulations, VSQGs may be subject to [other emergency planning regulations](#) depending on the amount of chemicals and oil storage capacity at the site.

If an environmental emergency occurs, use the following for reporting the event:

- EGLE, Pollution Emergency Alert System (PEAS) at 800-292-4706.
- Local emergency responders at 911.
- The U.S. Environmental Protection Agency, National Response Center at 800-424-8802.

If a release does occur, VSQGs must cleanup all releases of hazardous waste including contaminated soil as soon as practical.

VSQGs should test and maintain emergency equipment such as spill kits, fire extinguishers, and communication devices like internal alarm systems, two-way radios, etc., to ensure they will operate properly in the event of an emergency. An emergency coordinator should be available at all times who can assist with evacuation and responding to an emergency. Consider using the [EGLE posting](#) near key areas for staff to use in the event of an emergency. And be sure all staff are trained on the procedures for responding to an emergency. For more details on emergency response planning, see the [Contingency Plan and Emergency Response Procedures for Large Quantity Generators](#).

Additional Resources

To learn more, consider reviewing the following:

- Michigan Guide to Environmental Regulations, Chapter 2 - [Michigan.gov/EHSGuide](https://www.michigan.gov/EHSGuide).
- Recorded Waste Webinar Series available at [Michigan.gov/EGLEEvents](https://www.michigan.gov/EGLEEvents) under Recorded Webinars.
- [USEPA Frequent Questions About Implementing the Hazardous Waste Generator Improvements Final Rule](#)
- [USEPA Map of Where the Hazardous Waste Generator Improvements Rule is in Effect](#)

To find disposal options, search online using any search engine, see the [list of vendors](#) that assist with the collection of household hazardous waste, or contact your [local household hazardous waste](#) coordinator. For additional assistance from EGLE staff, contact the Environmental Assistance Center at 800-662-9278 or EGLE-Assist@Michigan.gov and ask them for hazardous waste program staff in your county.