ENVIRONMENTAL
Fact Sheet

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

29 Hazen Drive, Concord, New Hampshire 03301 • (603) 271-3503 • www.des.nh.gov

WMD-HW-32 2017

SQG Self-Transportation to Household Hazardous Waste Collection Events

For any New Hampshire business, the proper disposal of hazardous waste can be a significant expense. Fortunately for businesses that are small quantity generators of hazardous waste (SQGs), a municipal household hazardous waste (HHW) collection event can be an affordable, environmentally-sound disposal option. By participating in these programs, SQGs pay only to dispose or recycle their hazardous waste, and are spared the expensive pick-up, handling and transportation fees charged by hazardous waste transporters. The following provides guidance for understanding municipal HHW collection events and how SQGs can take advantage of these events. Full quantity generators cannot participate in HHW collection events.

Steps SQGs MUST take in order to participate in a household hazardous waste collection event:

1. Inventory all waste and determine which are hazardous.
2. Verify the SQG has a valid EPA ID number. If the SQG does not have one, contact the NHDES Waste Management Division at (603) 271-2921.
3. Contact the municipal HHW coordinator to obtain their approval to participate.
4. Contact and pre-register with the hazardous waste transporter while scheduling a drop off time for the collection event (typically before the event begins for homeowners).
5. Obtain a hazardous waste manifest from the transporter prior to self-transporting.
6. Prepare the waste and manifest for transportation to the HHW collection event.
7. Transport the wastes to the HHW collection event.
8. Sign the manifest in the boxes designated for the "Generator" and "Transporter 1," ensure the transporter at the HHW event signs the manifest in the box designated for "Transporter 2."
9. Make two copies of the signed manifest. Keep one copy for your records and mail or email the second to the NHDES Waste Management Division's Reporting Department.

Questions a business should ask BEFORE using a household hazardous waste collection event:

How Does A Municipal HHW Collection Event Work?

HHW collection events allow SQGs to self-transport up to 55 gallons of their hazardous waste to the collection event. Because the event uses a registered hazardous waste transporter who is already on location and set up to accept hazardous waste, the SQG can transfer their waste directly to the transporter. Before the event, the SQG must obtain the approval of the municipality and register with the transporter so each party knows what wastes will be transferred, and the SQG knows what its disposal costs will be. The SQG must also obtain a hazardous waste manifest for the waste that they intend to self-transport, and this manifest must accompany the waste during the self-transportation. A list of HHW collection locations and dates can be found at http://des.nh.gov/organization/commissioner/p2au/pps/hhwp/index.htm.

What types of hazardous wastes may an SQG transport to a municipal HHW event?
Any waste normally picked up from the SQGs site by a registered hazardous waste transporter may be transported to a HHW collection event with prior permission from the municipality and the transporter. Since SQGs have to obtain the hazardous waste transporter's approval prior to the collection event, the SQG should check with the transporter regarding what wastes will be accepted. Wastes not normally accepted are: explosive, medical, radioactive or infectious wastes. For more information on how to determine if your waste is hazardous, please refer to the NHDES fact sheet WMD-HW-11 "Identification of Hazardous Waste."

What are the transportation requirements?
As the generator of the waste, the SQG is responsible for ensuring that its hazardous wastes are properly packaged, labeled and transported safely to the collection event. The US Department of Transportation (USDOT) has established regulations for the transportation of hazardous waste that are also required by the NH Hazardous Waste Rules, detailed in Env-Hw 507.03 and Env-Hw 601.02(b). When the SQG contacts the transporter to register for the HHW event, the hazardous waste transporter can tell the SQG how to package particular wastes. The following are some of the requirements for packing and transporting hazardous waste, but please contact your transporter or refer to the NH Hazardous Waste Rules for a full list of requirements:

- **Manifest** – SQGs are required to obtain a uniform hazardous waste manifest for the hazardous waste they transport. This manifest should be obtained from the hazardous waste transporter prior to the collection event and must accompany the hazardous waste that the SQG is self-transporting.
- **Packing** – NH Hazardous Waste Rules refer to the USDOT requirements, including but not limited to:
  - The container must be sealed and in good condition.
  - The container must be compatible with the contents.
  - Incompatible wastes may not be stored in the same container.
- **Labeling** – All containers used for hazardous waste must be labeled in accordance with USDOT and state requirements.

What will it cost to participate in the HHW collection event?
SQGs pay the hazardous waste transporter directly for the handling and disposal charges based on the amount and type of wastes, but there is usually no additional charge from the municipality. The total cost and method of payment should be established when the SQG registers with the transporter prior to the event. By self-transporting their allowable wastes to an event, SQGs can save on pickup costs that are normally charged by the transporters.

SQGs must also have a mechanism for financial responsibility of self-transportation including $50,000 for bodily injury or death of each person in any one accident and $50,000 for loss or damage in any one accident to the property of others.

What happens after the transporter accepts my hazardous waste?
When the SQG drops off their hazardous waste, the transporter and the SQG will each sign the hazardous waste manifest. The SQG will sign in the boxes designated for the "Generator" and "Transporter 1" and the transporter will sign in the box designated "Transporter 2." The transporter is required to give a copy of that manifest to the SQG to keep for their records. **It is the SQG's responsibility to email (hazwastereporting@des.nh.gov) or mail (PO Box 95, Concord, NH 03302) a copy of the hazardous waste manifest to NHDES WITHIN 5 DAYS.**

For More Information
For more information, please contact the NHDES Hazardous Waste Management Bureau at 1-866-HAZWAST (1-866-429-9278) or (603) 271-2942. A list of household hazardous waste collection events, vendors that recycle universal waste and used oil, copies of other fact sheets and the Hazardous Waste Rules are available on the NHDES web site at www.des.nh.gov.