

Some General Notes to Help You Fill Out the SQG Form

Most of the questions on the form are self-explanatory. However, for some of the questions, a few additional tips may be helpful. If you have questions on a particular question, and you don't see it referenced below, please visit our website at www.des.nh.gov or call us at **1-866-HAZ-WAST** (1-866-429-9278 in-state only) or 603-271-2942 (out-of-state).



Section C: RCRA C Site Identification Form (Notification Form)

This section asks you to review your Notification Form and make any changes to it. If you no longer generate hazardous waste or **only** generate used oil and/or universal waste for recycle, **and** you no longer have ANY hazardous waste remaining on site, you can inactivate the EPA ID#. If this is the case, please update Section 9.A and note the details in Section 12 of the Notification Form. An inactive number can be reactivated if hazardous waste is generated again in the future. No fee is required to reactivate the number if it is for the same owner.

Section D: Waste Generation and Waste Type

1. **Waste Type:** This section applies to hazardous waste only. Do not list other wastes, such as universal waste (batteries, fluorescent lamps, mercury containing devices, CRTs, and anti-freeze) for recycle, used oil and used oil filters for recycle, and/or biohazardous waste. If you have a question regarding any waste that you generate, please call (603) 271-2942.
2. a. **Quantity of waste:** Please provide information (in pounds or gallons) for actual hazardous waste generated/created in the most recent 12 months. For example, if you received this form in October 2015, review your activities back to October 2014. If you created no waste during any month in that time period, write "0" or "none" in the table. Please do not put the quantity shipped per month or an average in this section. The actual generation rate per month (or amount of waste created and put into the waste container per month) should be recorded in this section.
b. This question asks for the **total quantity** hazardous waste you currently have stored at your facility at the time you are completing the SQG Form. It can be answered in pounds or gallons.
3. **Waste Determination:** As a business owner, it is your responsibility to know whether the waste generated by your operation is hazardous or whether it can be managed as non-hazardous (for example, placed in a dumpster). This question seeks to find out how you make that decision. Have you had a laboratory test the waste to determine whether or not it is hazardous? Do you use your knowledge or consult a material safety data sheet (MSDS)? Do you rely on your vendor to tell you?

Section E: Storage Requirements

Storage Requirements - Notes about Containers and Tanks

"Container" includes any pail, bucket, drum, or other portable vessel that can be moved.

"Tank" includes any stationary device that is permanently affixed to the floor or is otherwise not moveable.

"Good Condition" means free of any condition that could lead to a discharge of the contained waste, including, but not limited to, cracks, holes, leaks, corrosion, dents, rust, and bulges or other signs of pressure build-up.

"Compatible" means waste does not damage the structural integrity of the unit holding the waste.

"Impervious Surface" means any flooring or surface that is impenetrable by liquids; for example, cement and asphalt (provided it is not cracked or damaged). Wood or dirt flooring is not considered impervious.

"Secondary Containment" means an impervious berm or other containment structure that could contain a leak if one were to occur. Secondary containment is required for containers/tanks that are stored outside, near a drain, or on an impervious surface.

Storage Requirements - Notes about Labeling

The words **"Hazardous Waste"** must be written on each hazardous waste container.

"Specific Identification" means that the contents must be marked on the container, for example, "paint related waste."

Section F: Recordkeeping Requirements

All facilities are required to submit to NHDES a copy of each manifest used to ship hazardous waste within 5 days of each shipment. The copy can be scanned/emailed to hazwastereporting@des.nh.gov, mailed, or faxed to 603-271-2181 (if legible). This is the facility's responsibility, not the transporter, to ensure that this copy gets sent to NHDES at the time of the shipment. If you are unsure if a copy is being submitted by you, please contact NHDES.

The facility must also make sure they receive the final manifest copy from the Treatment, Storage, and Disposal Facility or transporter within 45 days of the pickup and keep both manifest copies on file at the facility (this copy and the initial copy).

Section G: Transportation Requirements

All hazardous waste is required to be transported on a uniform hazardous waste manifest, regardless of if you are using a transporter or are self-transporting your hazardous waste. If you are self-transporting your hazardous waste to a collection event, **you must** ensure that you obtain a uniform hazardous waste manifest **before** transporting your waste in order to prove that your waste was legally disposed of. If you have questions on the transportation requirements please contact NHDES.

Frequently Asked Questions



What is the purpose of this Certification?

This certification form is for Small Quantity Generators (SQGs) of hazardous waste to use when certifying to NH Department of Environmental Services that their company is in compliance with applicable hazardous waste rules. The self-certification program is required under RSA 147-A:5, IV, NH Hazardous Waste Law. The intent of the SQG Program is to increase the awareness, knowledge, and compliance rates of SQGs. The law requires SQGs to review their hazardous waste procedures, conduct an inspection of their facility, and certify compliance to NHDES.

Who must submit this Certification?

Each generator of hazardous waste that creates one drop to less than 220 pounds of hazardous waste in any calendar month of its operation must submit this form to NHDES once every three years, together with the fee.

What is the fee?

SQGs must submit a fee of \$90 per year, payable every three years at the time of certification. If you are **renewing** your self-certification (SQG Form), the associated fee is \$270. If this is an initial submittal, the fee may differ, as all generators are responsible for retroactive fees.

How do I know if I have a hazardous waste?

By testing the final waste or using your knowledge of the process that created it. A good rule of thumb is that if you are using your EPA ID # and a manifest, there is the strong likelihood that you are a hazardous waste generator.

I generate one gallon of hazardous waste per month. Do I have to be part of the program?

Yes. If you generate or have hazardous waste on site, you will need to complete the form and pay the fee.

I just have a parts washer? Do I have to comply with the requirements?

If you are using a hazardous parts washer, the resultant waste will be hazardous and you must comply. If you are using a non-hazardous parts washer, it could become contaminated through use. The waste (not the original solvent) should be tested or you should have proof based on knowledge to document if the waste is hazardous or non-hazardous.

I no longer generate hazardous waste. Should I fill out the forms?

Yes (but no fee is due). If your company no longer generates hazardous waste, please check and follow the instructions in Sections B.3 **and** C of the SQG Form. Also provide a comment in Item 12 of *RCRA C Site Identification Form* (Notification Form) identifying that you no longer generate hazardous waste and the reason for the change.

I only generate used oil that is recycled, do I need to comply with the SQG Program?

No*. If used oil is truly the only hazardous waste you produce (other than universal waste) and it is being recycled and managed appropriately, please check and follow the instructions in Sections B.1 **and** C of the SQG Form. Please also provide a comment in Item 12 of the Notification Form identifying that you are only generating used oil for recycle. ***Please note** that if you are generating any oil other than automotive oil, you must conduct an initial used oil determination to ensure that your oil is not hazardous waste.

What's a universal waste and are they exempt from the SQG Program?

"Universal Wastes" include waste antifreeze, mercury-containing devices, fluorescent lamps, batteries and cathode ray tubes (CRTs). Although SQGs are subject to the Universal Waste Rule, they do not need to count that waste toward their hazardous waste status or include it on the SQG Form, as long as it is being managed appropriately and is being recycled.

Does my municipal government need to comply? How about public school districts?

Yes, if they generate small quantities of hazardous waste, they need to complete the SQG Form. However, both are political subdivisions and are exempt from the fee. Please note that State Agencies are not exempt from the fee.

Where can I get a copy of the NH Hazardous Waste Rules?

You can order a copy by telephone at (603) 271-8876 or download them through www.des.nh.gov.