

Generator Size Classification

Generator Classification

- You “are” what you make
- The more you make, the more you are regulated
- Small Quantity Generator (“SQG”) vs. Full Quantity Generator (“FQG”)

Classification is important

- **Different rules apply to different classifications**
 - **FQG = more rules**
 - **SQG = less rules**



Generator Responsibility

1. Look at all your waste streams
2. Perform complete hazardous waste determinations
3. Determine your correct generator classification
4. Tell DES your correct generator classification (Chapter 9)

What IS Your Generator Status?

- Almost always based on AMOUNT GENERATED IN A CALENDAR MONTH
- Exception
 - The amount stored is counted when you have “**Acutely**” hazardous wastes

Acutely Hazardous Waste

Any “P” listed waste

F020-F023

F026 and F027

Or

NH03 Strontium Sulfide

NHDES Terms vs. EPA Terms

Amount in <u>storage</u>	Amount <u>Generated</u> per Month	DES <u>Rules</u> Term	DES <u>Recordkeeping</u> Term	Federal <u>EPA</u> Term
< 2.2 lbs acute	< 220 lbs Non-acute	SQG	SQG	CESQG
	220 - 2,200 lbs	FQG	FQG2	SQG
≥2.2 lbs acute	>2,200 lbs	FQG	FQG1	LQG

NH SQG – Federal CESQG

Non-acute Generation



Less than 220lbs/month

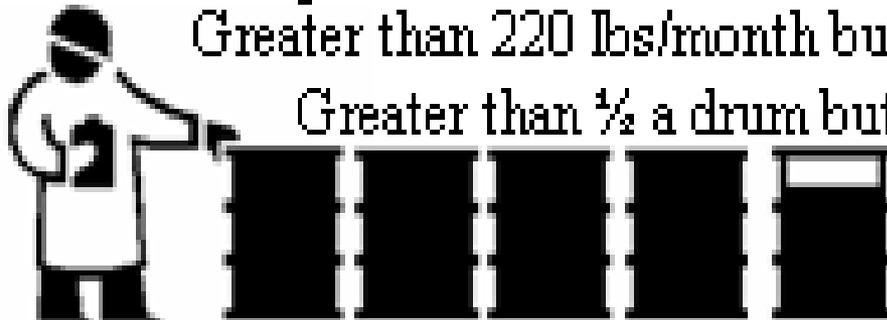
← About a ½ a drum

NH Full Quantity Generator

Federal SQG

Greater than 220 lbs/month but less than 2200lbs/month

Greater than ½ a drum but less than 4 ¾ drums



Federal LQG

More than 2200lbs/month

More than 4 ¾ drums/month



Don't Count

- “Used oil for recycle”
- Lead acid batteries
- Universal Waste

Three words = BIG Difference

- ✓ To Generate
- ✓ To Store
- ✓ To Ship

GENERATE per month

- Calendar month: 28,29,30 or 31 days....depending on the month
- Must count hazardous waste generated from every storage location

Generation

- Pete generates 127 pounds of non-acute hazardous waste in May, 240 pounds of non-acute hazardous waste in June, and 170 pounds of non-acute hazardous waste in July
- What's generator status does Pete's facility have in each of the months of May, June, and July?

STORE – Hazardous Waste

- STORE –
 - 90-day Hazardous Waste Storage Area(s)
 - Satellite container(s)
- 2 Conditions:
 - When it is acute hazardous waste
 - When you are a SQG with 2,200 pounds of non-acute waste

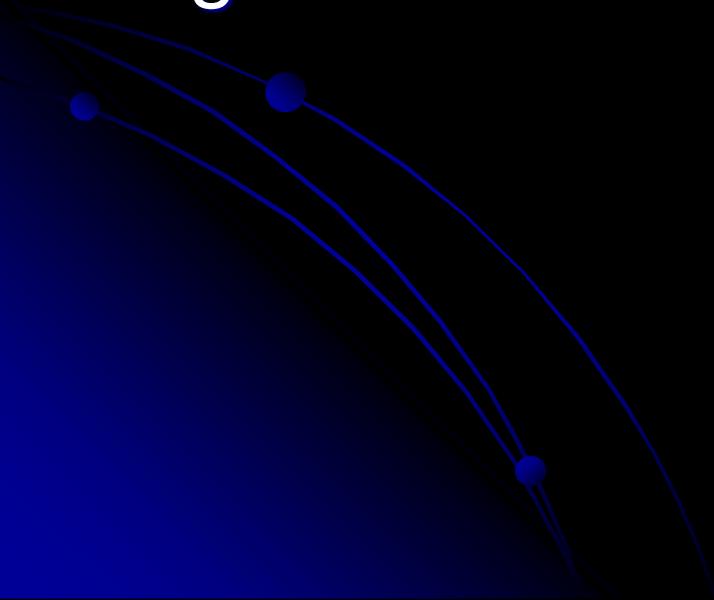
STORAGE CALCULATIONS

Tim has 450 pounds of non-acute hazardous waste in storage. What is Tim's correct generator classification?



Storage Calculation

- Tim has 17 pounds of P-listed Epinephrine (P042) in storage. What is Tim's generator status?



SHIP - Manifest

- On a hazardous waste manifest
- Shipping date most likely does **NOT** mean generation month

SHIPPING CALCULATIONS

Susan ships 1,800 pounds of hazardous waste in mid-July. What is the correct generator classification for her facility from January through July?

Shipping

- Shipping records only *suggest* the amount you generate. You should not rely on them to establish your generator classification
- DES does not know your operations as well as you do. Under some circumstances, we may *estimate* your generator classification based on your shipping records, since that's the only information we have.