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

<table>
<thead>
<tr>
<th>Amount in storage</th>
<th>Amount Generated per Month</th>
<th>DES Rules Term</th>
<th>DES Recordkeeping Term</th>
<th>Federal EPA Term</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 2.2 lbs acute</td>
<td>&lt; 220 lbs Non-acute</td>
<td>SQG</td>
<td>SQG</td>
<td>CESQG</td>
</tr>
<tr>
<td></td>
<td>220 - 2,200 lbs</td>
<td>FQG</td>
<td>FQG2</td>
<td>SQG</td>
</tr>
<tr>
<td>≥2.2 lbs acute</td>
<td>&gt;2,200 lbs</td>
<td>FQG</td>
<td>FQG1</td>
<td>LQG</td>
</tr>
</tbody>
</table>
Non-acute Generation

NH SQG – Federal CESQG

Less than 220 lbs/month
About a ½ drum

Federal SQG
Greater than 220 lbs/month but less then 2200 lbs/month
Greater than ½ a drum but less then 4 ¾ drums

Federal LQG
More than 2200 lbs/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
Tim has 450 pounds of non-acute hazardous waste in storage. What is Tim’s correct generator classification?
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
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.