



Top Ten SQG Self-Certification Form Errors

For those of you in Belknap, Carroll, Coos, Grafton, Merrimack and Sullivan Counties, it's time to re-examine your hazardous waste streams and all of the documents that let us know you are managing your wastes properly. Don't forget, your Self-Certification Form, updated RCRA C Site Identification Form and the fee are due by January 1, 2021. To help you and everyone else in the state with this process, we have created a list of common errors made when it's time to re-notify.



1. Forgetting to Update the RCRA C Site Identification Form

This form is already filled out with the information you provided us previously, and is included in the packet that is sent to you every 3 years along with the SQG Form. It is a good opportunity to review the information. Even if your SQG Form is not due this year, if you have made any changes, it's a requirement to update the [RCRA C Site Identification Form \(Notification Form\)](#) when changes are made. Is all the contact information still correct? Is your waste generation information still accurate? You may no longer generate certain wastes, may generate more or less of certain wastes, or you may generate an entirely new waste stream. Maybe you found a way to eliminate your hazardous waste generation altogether. We want to know all that. If you have moved or changed ownership, not only do you need to provide the new owner information and address, but you will need to pay the initial \$150 notification fee and you may need a new EPA ID # if you have moved your location.

2. Not Answering Section C.2

This question can be confusing because it is written as a double negative. Answer yes, if you stopped generating, creating or storing waste at this facility (other than used oil and/or universal waste). If you answer yes, please

COMPLIANCE CORNER

What are the recordkeeping & reporting requirements for SQGs?

Generators must keep hazardous waste records for at least 3 years including copies of the following:

- Manifests.
- Quarterly activity reports.
- Test results.
- Waste analyses.
- Waste determinations.
- Records of hazardous waste. spills or discharges.

Remember: If paper manifests are being used, you are also required to submit a copy of the manifest that the transporter gives you (called the Generators Initial Copy) to NHDES within five days. It is your responsibility to scan & email to hazwastereporting@des.nh.gov within five days. A photocopy can be mailed or faxed in lieu of email.

USEFUL LINKS

- [SQG Filling Out the Form Help](#)
- Past issues [SQG News](#)
- Hazardous Waste Determination [videos](#) - [factsheet](#) - [checklist](#)
- NHDES Hazardous Waste Management Bureau at (603) 271-2942 hwcomp@des.nh.gov
- Hazardous Waste Hotline: (866) HAZWAST

provide the date and answer questions a. and b. Most generators will answer no because they are still generating, creating and storing waste.

3. Including Universal Waste, Used Oil & Biohazard Waste in Section D.1 – Waste Type



Universal wastes (batteries, fluorescent lamps, mercury containing devices, cathode ray tubes from older TVs and computers (CRTs), pesticides and antifreeze), used oil and oil filters are wastes generated by a wide variety of establishments. They are still considered hazardous, but are managed under less stringent rules designed to reduce the regulatory burden and increase proper management for the variety of businesses that generate these wastes. These wastes should NOT be included in Section D and don't count toward the SQG monthly 220-pound generation limit. Biohazard wastes (bloody gauze, sharps, etc.) are dangerous, but not regulated under the Hazardous Waste Rules and also should not be included on the SQG Form. However, they are regulated by the NHDES Solid Waste Program.

4. Listing the Wrong Waste Type in Section D.1

All sections of the form must be filled in. Answer all of the questions to the best of your ability. One of the most common mistakes we see in this section is copying the waste and amounts listed per month from the RCRA C Site Identification Form. As mentioned above, this is your opportunity to verify that the waste streams listed on both the SQG and RCRA forms are still accurate. If you have added or eliminated any waste streams, please note that on both forms. Also do not include non-hazardous waste in this section. Here's an example of what we are looking for under

Waste types in Section D.1:

List Hazardous Waste(s)	How is it Generated?
Waste Paint	Painting Vehicles
Mineral Spirits	Cleaning Spray Gun
Waste Acids	Etching Metal
Lead	School Science Lab Waste

5. Quantity of Waste Generated in Section D.2

We want to know how much hazardous waste you **generate** each calendar month, not what you **shipped**. The term "generate" refers to the amount of waste you create or actually put into the waste container in that month. The SQG category of generators ranges from one drop up to 220 pounds (about 25 gallons or 1/2 of a 55-gallon drum) per month. If you generate more than 220 pounds in a month, you are considered a Full Quantity Generator and different rules apply.

As a SQG, you are allowed to store waste indefinitely up to 2,200 pounds (other rules for larger storage amounts apply) so your monthly generation will give us a better idea of the quantities of waste you are generating. If your business generates no waste in some months, just put zero for those months. You can estimate your generation using your knowledge of your process if you don't have exact numbers. One common mistake in this section is using averages based on shipping manifests. In some cases, this may be appropriate if you do the same thing each month and ship off all of your waste on a regular basis. But most often, manufacturing goes up and down during the year or depending on what job is being done. Also, sometimes only certain containers are shipped when they are full, and others may take longer to fill so aren't shipped at the same frequency. Therefore, it's better to track your waste generation accurately per month using some sort of tracking system that works for you.

6. Quantity of Waste Stored in Section D.3

This question is often left blank, but you should list the amount of hazardous waste you have in storage *at the time you are filling out the form*. Your best estimate is fine, but you should add up the waste in all of the containers to put a cumulative amount. Please do not include universal wastes, used oil, biohazardous wastes or non-hazardous waste. Weighing each container is not necessary. Use your best estimate, based on how full the container is and the weight of the waste per gallon, to help you figure this out.



7. Waste Determination in Section D.4

This is a relatively new change to the form. All generators must review all wastes created at their business and document whether they are hazardous waste or not. These determinations should be done at the point the material is no longer usable and determined to be a waste, **prior** to any treatment of mixing with other material. Since waste determinations can be confusing we created a [fact sheet](#) and [short videos](#) that explain the process for documenting hazardous waste determinations. Please refer to the [Hazardous Waste Determination Checklist](#) to help you be properly document your wastes and be prepared for an inspection.

8. Checking “No” on Certain Questions in Section E (Storage Requirements)

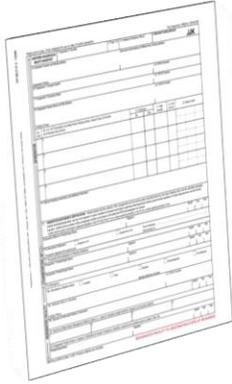
If you answer “No” to form items that are required, you should correct the situation prior to sending in the form. If you send in the form certifying that you are not in compliance with the storage requirements, you are likely to get a call or email to make sure you have corrected the issue(s). This is one of the most common questions answered incorrectly: “Is there a ‘No Smoking’ sign posted near ignitable or reactive wastes?” **Not sure what an ignitable or reactive waste is?** Check the [Characteristic Waste Video](#) and [Identification of Hazardous Waste Fact Sheet](#) to learn more. Many people check “No” or “N/A” even though they are storing these types of wastes. Often the reason is because they have a no smoking policy at their facility and feel that it is unnecessary. This is not the case. “No Smoking” signs are required to be posted near ignitable or reactive waste, even if there is a no smoking policy at the business, hospital or school. Note that even a simple hand-written sign is adequate, as long as it’s obvious and readable.

9. Extended Accumulation in Section E.16

If you generate hazardous waste and want to store more than 220 pounds at your facility, you need to complete the extended accumulation checklist on page 6 of the form. Many facilities leave this page blank, even though they are regularly storing and shipping more than 220 pounds of hazardous waste. Keep in mind, 220 pounds equals about half of a 55-gallon drum, so if you are filling 55-gallon drums before shipping them, you are required to follow the extended accumulation requirements. Extended accumulation won’t cost you any additional money but requires more oversight of your waste. One advantage to storing larger amounts of waste is that it may make financial sense to have the transporter come to your facility less frequently. NHDES has made complying with these extended storage requirements easier by offering templates, inspection checklists or emergency postings upon request. For more information please refer to page 5 of the [Hazardous Waste Small Quantity Generator Requirements](#) guidance document.

10. Record Keeping in Section F

You are required to keep copies of your shipping manifest or have a way to prove that the manifests were received by the Treatment, Storage, and Disposal Facility (TSDF) for the past three years. This may be a combination of paper manifest copies or by verification using the E-Manifest database.



If your transporter is having you sign a paper manifest copy, you are also required to submit a copy of the manifest that the transporter gives you to NHDES within five days. Many facilities think the transporter does this for them. They do not – it is your responsibility. Every time you have hazardous waste picked up, a copy of the manifest the transporter gives you (called “Generators Initial Copy” on the bottom right corner) should be scanned and emailed to hazwastereporting@des.nh.gov within five days. A photocopy can be mailed or faxed in lieu of email.

If your hazardous manifest process is fully electronic and you do not sign a paper copy, you do not need to submit a copy to NHDES.

These are just some of the errors we see on a regular basis. Remember to sign and date the form and return it to NHDES. If you have questions or need assistance, you can contact Christie Faro at (603) 271-2942 or SGQ@des.nh.gov or Cynthia Nelson at (603) 271-6460 or NHPPP@des.nh.gov.

CONTACT US

If there is something you would like to read more about such as: developing a regulatory checklist, reporting on episodic events, used oil recycling, pharmaceutical waste, or other topics of interest, please feel free to provide feedback to NHPPP@des.nh.gov.

