Very Small Quantity Generator Basic Requirements

Many businesses find it difficult to juggle their daily affairs and still have time to keep up with the regulations that affect them. This brief publication, though not a substitute for reading the actual regulations*, may help businesses responsibly manage very small quantities of hazardous waste.

First make sure your waste is indeed hazardous, by using your knowledge about the waste you generate, or by having your waste tested by a certified laboratory. If your waste is hazardous; if you generate less than 220 pounds on a monthly basis and do not exceed this generation in any month, your business is considered to be a “Very Small Quantity Generator” (VSQG). A VSQG should never accumulate more than 2,205 pounds. (Use this rule of thumb to estimate how much waste you generate: Two hundred twenty (220) pounds of liquid waste is approximately half of a 55-gallon drum.)

While accumulating waste, very small quantity generators are required to do the following:

- Keep the lid on drums when you are not removing or adding waste to the drum.
- Label your drums with the words, “Hazardous Waste”.
- Transfer waste to another container if it is not in good condition or it begins to leak.
- Use containers that are compatible with the waste you are accumulating.
- Separate incompatible wastes by storing them away from each other or constructing berms or dikes.
- Keep track of how much waste you produce. VSQGs should not accumulate more than 2,205 pounds (roughly equal to five 55-gallon drums) of hazardous waste on-site at any time. VSQGs that exceed either the monthly generation limit of 220 pounds or on-site accumulation limit of 2,205 pounds become subject to more stringent regulations.
- Before reaching the accumulation limit, have the waste transported to a licensed hazardous waste treatment, storage and disposal facility; a very small quantity generator hazardous waste collection facility; or a solid waste municipal landfill approved to accept hazardous waste from a VSQG.

While accumulating waste, it is recommended that very small quantity generators do the following:

- Don’t mix different types of waste (such as waste oil, paint, and antifreeze) in the same container.
- Keep storage areas dry and secure, prevent vandalism and spills, and inspect areas frequently.
- Reduce your waste generation whenever possible.
Remember, VSQGs should never generate more than 220 pounds in any month and never accumulate more than 2,205 pounds (roughly equal to five 55-gallon drums) of hazardous waste on-site at any time.

When shipping waste, very small quantity generators have the following options:

- You may transport your waste to a very small quantity generator hazardous waste collection facility. Contact a DNR waste program specialist to find these facilities. Be sure to follow any state or federal rules that may apply.
- Take your waste to a licensed hazardous waste treatment, storage or disposal facility. Some transporters with regular service schedules in your area may be available for more frequent waste pickups.
- Take your waste to a solid waste landfill approved to accept hazardous waste from very small quantity generators. Note: No solid waste landfill in Wisconsin is approved to take VSQG hazardous waste.
- You may self-transport your waste or hire a transportation company. The transporter is not required to have a State of Wisconsin solid or hazardous waste transportation license.

Note: Although not required by hazardous waste rules*, a VSQG may use a uniform manifest to ship hazardous waste. If a uniform manifest is used, DNR requires a VSQG to follow all manifest requirements and obtain an Environmental Protection Agency (EPA) ID number. Obtain the Notification of Hazardous Waste Activity form 8700-12 from: http://www.epa.gov/wastes/inforesources/data/form8700/forms.htm. Send the completed form to: Notification Processing, WI Department of Natural Resources, P.O. Box 7921, Madison, WI 53707.

Less waste means less regulation!!!!!! 😊

DNR wants to hear success stories from businesses of all sizes that are able to reduce their hazardous waste generation and save money simultaneously. Other companies might benefit from your experiences. Wisconsin also supports several recognition awards for businesses that generate less waste. Many waste reduction options are available. Contact your local DNR hazardous waste specialist for details. (See below.)

Remember, you are responsible for your waste, from the point of generation through proper treatment, storage or disposal.

Or contact a waste management specialist. (See the information provided below.)

For more information, look up the DNR Bureau of Waste and Materials Management’s website at http://dnr.wi.gov/topic/Waste/. Or contact waste management staff at these DNR regional offices:

- Northeast Region, Green Bay
  920/662-5100
- Northern Region, Rhinelander
  715/365-8900
- Northern Region, Spooner
  715/635-2101
- Southcentral Region, Fitchburg
  608/275-3266
- Southeast Region, Milwaukee
  414/263-8500
- West Central Region, Eau Claire
  715/839-3700
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Contact 608/266-2111 for further information.

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