

Requirements for SMALL QUANTITY GENERATORS (SQGs)

If you generate between 220 and 2,200 lb of hazardous waste and no more than 2.2 lb of acute hazardous waste per calendar month, you are a SQG

Recordkeeping and Reporting Requirements



You must obtain an EPA Identification number. This ID number is tied to your site address. A link to the registration form, 8700-12, can be found on DEQ's website. Alternatively, you may register for an EPA ID number through EPA's myRCRAid system, a fact sheet for registering can be found on DEQ's website. If the waste streams you generate change, or you become an LQG or VSQG, you must update your registration.



Annual reporting of hazardous waste generation is required for all SQGs. Report forms are emailed to registered SQGs in January and are due by March 1. DEQ issues annual fees based on this report.



Manifests are required for all generators whose hazardous waste is transported off-site for disposal. You must comply with the hazardous waste manifest requirements at 40 CFR part 262, subpart B. Manifests must be kept for a minimum of 3 years.



EPA also established a national system for tracking hazardous waste shipments electronically, known as e-manifest. Visit DEQ's website for instructions to register for e-manifest.



Emergency Preparedness

Emergency equipment testing and maintenance, access to communications or alarms, and emergency arrangements with local authorities are required in accordance with 40 CFR part 262.16(b)(8) & (9).





Overview of Compliance Requirements

40 Code of Federal Regulations (CFR) Part 262.13, .15, and .16, incorporated by reference in Administrative Rules of Montana (ARM) Title 17, Chapter 53

Hazardous Waste Handling

Hazardous waste accumulation containers and tanks must be marked with the words "hazardous waste", the date waste accumulation began, and the hazards of the contents using a nationally recognized hazard label.

Keep containers in good condition, closed, and do not mix incompatible waste.



Hazardous Waste Accumulation

SQGs may accumulate hazardous waste on-site for 180 days without a permit, or 270 days if the shipping distance is greater than 200 miles. The quantity of accumulated hazardous waste on site must never exceed 6,000 kilograms (13,200 pounds).

Inspect container storage areas at least weekly.

Waste generated in small amounts throughout your facility may be stored in satellite accumulation areas at or near the point of generation of the waste. No more than 55 gallons of each non-acute waste type may be accumulated in one satellite accumulation area. Once this quantity has been exceeded, you have three calendar days to transfer the waste to your designated central accumulation area, and the 180/270 day accumulation time limit begins.

Hazardous Waste Transportation and Disposal

Hazardous waste must be disposed at a legitimate recycling facility or a permitted transfer, storage, or disposal facility (TSDF).

A licensed hazardous waste transporter is required for transportation of your hazardous waste off-site for treatment and disposal. A list of hazardous waste transporters and brokers is available on DEQ's website.

For more information on hazardous waste determinations, categories, and compliance, visit https://deq.mt.gov/twr/Programs/hazmat