

Consolidation of Very Small Quantity Generator (VSQG) Hazardous Waste at a Large Quantity Generator (LQG)

If a VSQG is part of a larger company, the VSQG facility may be able to consolidate its hazardous waste at an LQG that is part of the same company

Requirements for the VSQG

40 CFR Part 262.14(a)(5)(viii), Incorporated by Reference in ARM 17.53.601



Waste Handling

Before transporting the waste, ensure each container is marked with the words "Hazardous Waste" and with the hazards of the contents using a nationally recognized hazard label.

Keep containers in good condition, closed, and take precautions to avoid mixing incompatible waste.



Transporting the Waste

Ensure the delivery of your waste to the LQG location, making sure it stays within the overall accumulation limit for VSQGs (less than 220 lb of non-acute hazardous waste or 2.2 lb of acute hazardous waste).

A manifest is not required to transport the waste to the LQG, but some form of a shipping document is needed.

The waste can be self-transported by the VSQG to the LQG; however, US Department of Transportation hazardous materials transportation requirements apply.

When the VSQG and LQG are operating in different states, they may only consolidate waste at the LQG if both states have adopted EPA's consolidation provision.



Requirements for the LQG

40 CFR Part 262.17(f), Incorporated by Reference in ARM 17.53.601



Notification

At least 30 days before receiving the first shipment from one of your VSQGs, use the EPA Site ID Form 8700-12, or the electronic myRCRAid system, to notify DEQ that you plan to consolidate your VSQG waste at the LQG facility. All subsequent changes must be submitted on the notification form within 30 days of the change. Also fill out the addendum to the Site ID Form listing the VSQGs that are participating in the program. There is a change of activity fee of \$150/notification.



Waste Handling

Once the hazardous waste has been received from the VSQG, manage the waste along with your own generated hazardous waste, following all LQG requirements.

Once the VSQG waste arrives at the LQG it becomes subject to the 90-day storage limit. The LQG must label the hazardous waste containers with the date they were received.



Reporting and Recordkeeping

The LQG must maintain records of shipments for three years from the date the hazardous waste was received from the VSQG. These records must identify the name, site address, and contact information for the VSQG and include a description of the hazardous waste received, including the quantity and the date the waste was received.

Waste received from a VSQG must be reported on its annual hazardous waste generator report with the appropriate source code designated for VSQG consolidation.



Both the VSQG and the receiving LQG must be under the control of the same company

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