

# Your Top Waste Compliance Questions, Answered.

## What are the hazardous waste generator categories?

There are three (3) Federal categories of hazardous waste generators:

- **Very Small Quantity Generator (VSQG)** – generates 100 kg (220 lb) or less per month
- **Small Quantity Generator (SQG)** – generates more than 100 kg (220 lbs) and less than 1,000 kg (2,200 lbs) per month
- **Large Quantity Generator (LQG)** – generates more than 1,000 kg (2,200 lbs) per month

States with an authorized hazardous waste program can also create their own generator categories, so your generator category will also depend on the state you are located in.

### HOW ENCAMP HELPS:

Encamp knows, based on the location of your site, if the generator categories follow the Federal categories or if there are state-specific categories.

Facility	Generator Status
Facility 62: Whitmore Ave	SQG
Facility 100: Lake Drive	LQG
Facility 201: E. Henry St	VSQG




## How do I know my generator category?

A hazardous waste generator must determine their generator category based on their monthly hazardous waste generation. Tracking monthly generation is important, not only for initially determining generator category, but to identify if changes in your operations cause a change in your generator category (by generating more or less hazardous wastes.)

In addition, the state that a generator is located in is also important in determining generator status, because some states have different generator categories from the Federal categories.

### HOW ENCAMP HELPS:

Encamp helps a generator identify generator category based on the geographical location of the site and based on the hazardous waste generation reported in Encamp. Encamp will continue to monitor generation data provided and will alert the user to situations where the generation indicates a change in generator category.



Wastestream	Generation Date	Reporting Quantity
Compressed Gas (Propane)	1/4/2023	100 lbs / 10 containers
Paints and Thinners	10/26/2022	20 lbs / 1 container

New Return Manifest Received: Compressed Gas (Propane)

## Why is it important to accurately calculate your generator category?

The Federal EPA requires that all hazardous waste generators make accurate hazardous waste determinations, track monthly hazardous waste generation, and accurately self-identify their generator category.

In addition, a generator’s requirements vary depending on their generator category. For example, a very small quantity generator has very few requirements but a large quantity generator has many requirements, including reporting, maintaining a contingency plan, and completing weekly inspections of hazardous waste storage areas.

## What are the types of hazardous waste?

Hazardous wastes are either characteristic or listed hazardous wastes.

### Characteristic Hazardous Wastes:

(“D” codes):

- D001 - Ignitable wastes
- D002 - Corrosive wastes
- D003 - Reactive wastes
- D004 through D043 - Toxic wastes

## Listed Hazardous Wastes:

- “F” codes - wastes from non-specific sources, generated from a common manufacturing or industrial process
- “K” codes - wastes from specific sources, generated from specific sources in specific industries
- “U” codes - discarded commercial chemical products, unused/virgin material, pure commercial-graded chemical wastes
- “P” codes - acutely hazardous wastes, similar to “u” code waste but more hazardous

## What are Universal Wastes?

Universal Wastes are hazardous wastes that are commonly generated across many industries and are allowed to be handled under less-stringent regulations. There are five (5) Universal Wastes identified by the Federal EPA: Batteries, Lamps, Pesticides, Mercury-containing Equipment, and Aerosol Cans. Each state with an authorized hazardous waste program can choose to accept any, all, or none of these Federal Universal Wastes. In addition, states can add their own state-specific Universal Wastes. Some common state-specific wastes are paint-related wastes, photographic solutions, electronic equipment, and antifreeze.

**HOW ENCAMP HELPS:**

Encamp identifies the Universal Wastes applicable to your site(s) based on the individual site’s state location.

Select State: Hawaii

- ✓ Batteries
- ✓ Pesticides
- ✓ Mercury-Containing Equipment
- ✓ Lamps
- ✓ Aerosol Cans
- ✓ State additions (see notes)

Regulatory Citation: 11-273.1, Hawaii Administrative Rules

State Additions: electronic items and solar panels

## What is RCRA?

RCRA is the Resource Conservation and Recovery Act. RCRA was implemented by the Federal EPA to combat US dependency on landfills, handle the increase in industrial and municipal waste generation, and promote “reduce, reuse, recycle”. RCRA was created to protect human health and the environment from the potential hazards of waste disposal and to promote the conservation of energy and natural resources.

RCRA is found in 40 CFR parts 239-282 (parts 260-273 specifically cover hazardous waste. States can adopt these Federal rules or create their own, as long as those are as stringent or more stringent than the Federal requirements.

A major concept in RCRA is “Cradle to Grave” - RCRA requires hazardous wastes to be properly managed from the point of generation (“cradle”) to the point of final destruction (“grave”). The generator of a hazardous waste essentially “owns” the responsibility for the waste forever. If a generator ships hazardous waste to a hazardous waste landfill that is not managing the waste properly, the generator may be held responsible and have to pay for the cleanup and proper disposal of their hazardous waste.

### HOW ENCAMP HELPS:

Encamp helps with “cradle-to-grave” management of hazardous waste by providing a comprehensive system to document the management of hazardous waste from generation to final disposition.

Manifest Number	Status	Shipped	Received
02178390333K	Closed	6/2/2022	6/5/2022
001218385WAS	Closed	6/1/2022	6/6/2022
017425743FLE	Closed	6/2/2022	6/5/2022



## Who has to complete a hazardous waste report? How often?

Per the Federal regulations, all large quantity generators must complete a biennial report, due by March 1st each even-numbered year for the previous odd-numbered year. However, some states require additional reporting, such as an annual report or even quarterly reporting. Reporting can also be required for small quantity generators or very small quantity generators. Reports may be completed in the Federal RCRAinfo portal, in a state-specific system, or via mail or email with state-specific forms.

### HOW ENCAMP HELPS:

Encamp knows what reporting is required for a specific site, based on the site’s generator status and the state in which the generator is located. Encamp also knows what state-specific information is required and will require that information in the app so that you will have all the information needed to complete the report.

Facility	Report/Notification Type	Status	Last Updated
<b>LQG</b> Facility 9 Vicente Avenue Saba Grande, PR EPA ID PRD090506239	Update Notification	<b>Filing Complete</b>	9/13/2017



## Are there fees associated with hazardous waste programs?

There are no Federal fees associated with maintaining an EPA ID number, generating hazardous waste, or submitting a biennial report. However, states can institute any type of fee structure they would like. Some states assess an annual fee for maintaining an EPA ID number and others charge a fee when a report is submitted. Other fees include taxes on the amount of hazardous waste generated and fees for submitting Notifications.

### HOW ENCAMP HELPS:

Encamp knows what fees a generator is required to pay, and when they are due, based on the generator's generator category and geographic location. Encamp can pay these fees on behalf of the generator and maintain record of the payment in Encamp.

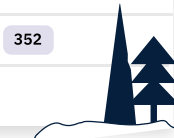
## What documentation do I need to keep and how long do I need to keep it?

A hazardous waste generator needs to keep all of the documentation associated with waste characterization, waste generation, and waste disposal. These documents need to be kept for three (3) years to satisfy Federal requirements, but some states require these documents be retained for longer.

### HOW ENCAMP HELPS:

Hazardous waste records can be maintained in paper form or electronically, they just have to be readily available at the site. Encamp stores all of your records, from waste characterization documentation, to generation records, to shipping and disposal documentation. These records will be easily accessible to personnel onsite during an inspection, and also able to be accessed by corporate EHS or other functions that may need access to these records.

Wastestream	Classification	Profile Number	EPA Waste Codes	State Codes
15% Sulfuric Acid Solution	RCRA Hazardous	D002	D002	352
HWG & HWC Cleaning Solvent	RCRA Hazardous	F003	D001 F003	



## Looking for a Hazardous Waste Compliance Solution?

With Encamp, view all your RCRA compliance data in one place to easily manage generator status, manifests and more across multiple facilities.

Explore Encamp

