

Perchloroethylene (Tetrachloroethylene) Dry-to-Dry machines

Very Small Quantity Generator (VSQG) and Small Quantity Generator (SQG) of Hazardous Waste
Basic requirements – Comparison Chart

VSQG & SQG	
Have you identified and quantified the hazardous waste generated in a month?	Typical hazardous waste includes some spent solvents, filter cartridges, distillation residues (still bottoms or “muck”) and separator water F002 – spent Perchloroethylene D039 – waste containing Perchloroethylene at 0.7 mg/L or greater
Have you determined if the waste is listed (F - hazardous waste from non-specific sources, P & U - discarded commercial chemical products, off-specification, container residues and spill residues) or characteristically hazardous waste ?	
Do you keep and maintain a manifest? An SQG should retain copies for 3 years.	
VSQG	SQG
Does your business generate less than 100 kg or 220 lbs. (about 26 gallons) ¹ of hazardous waste in any given month? ²	Does your business generate more than 100 kg (220 lbs.) , but less than 1,000 kg or 2,200 lbs. (about 260 gallons) ¹ of hazardous waste in any given month? ²
	If yes, has your business obtained an EPA ID? Please peruse How to obtain a new RCRA ID number - http://www.in.gov/idem/landquality/2372.htm ³
	Your hazardous waste transporter should also have an EPA ID.
Does your business store less than 1,000 kg (2,200 lbs.) of hazardous waste at any time? If no, the facility needs to comply with SQG requirements (right hand column).	Does your business store less than 6,000 kg (13,200 lbs.) of hazardous waste at any time? If no, does the facility have a RCRA Permit?
29 CFR 1910.1200 Appendix C , Occupational Safety and Health Standards (OSHA) may require appropriate labeling and other forms of warning under a hazard communication program.	Has each container been labeled or marked clearly with the words, " Hazardous Waste " and an indication of the hazards of the contents (examples include a hazard statement or pictogram, DOT labeling or placarding)?
	Has each container and tank been marked clearly with the accumulation start date (the first date that you placed waste into each container and tank)?
	Does someone with your business inspect the containers weekly and areas where they are stored to determine if they are in good condition? If a container begins to leak or is deteriorated, the contents must be transferred to a container in good condition.
	Does your business use containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste?
	Does your business store only compatible waste in a container?

VSQG	SQG
	Are containers kept closed ⁴ except when adding or removing waste?
	Are containers opened, handled or stored in a manner that prevents a rupture or leakage?
	Does your business have a designated emergency coordinator?
	Are all employees familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies?
	Does your business accumulate hazardous waste on-site less than 180 days (270 days if transporting a distance greater than 200 miles)? If no, does the facility have a RCRA Permit?
	Has your business experienced any delays in receiving a waste profile or rescheduling where the facility might exceed the 180 or 270 days? If no, does the facility have a RCRA Permit?
Is the waste transported to an entity that uses, reuses or legitimately recycles the waste or permitted municipal disposal facility or permitted hazardous waste treatment storage and disposal facility? ²	Is the waste transported to a permitted hazardous waste treatment storage and disposal facility?
Indiana does not require a manifest. Some destination states may require one. In such cases, the manifest required by the destination state to track these shipments are subject to e-Manifest.	EPA accepts five types of manifest submissions, which include: fully Electronic, hybrid, data & image, scanned image & mailed paper. https://www.epa.gov/e-manifest/how-submit-hazardous-waste-manifest
	Did you submit an annual hazardous waste manifest report by March 1 for the prior year? ²

¹ Assuming the density of the waste to be approximately 8.5 lbs./gallon

² Episodic generation of hazardous waste – A planned or unplanned event that does not normally occur during facility operations can allow a facility to retain its generator status assuming certain provisions are followed which includes obtaining an EPA ID. The other provisions can be found at 40 CFR 262, Subpart L. The federal rules addressing VSQGs require manifests for certain episodic waste events at VSQGs. When such an episodic event occurs, and the VSQG rules apply, then these shipments and their manifests would be subject to e-Manifest.

³ Obtaining an EPA ID and submitting notifications including any changes as well as annual reporting requires the user to register for an online account - <https://rcrainfo.epa.gov/rcrainfoprod>.

⁴ A container holding hazardous waste must be closed at all time during accumulation except when adding, removing or consolidating waste or when temporary venting of a container is necessary for proper operation of equipment or to prevent dangerous situations such as build-up of extreme pressure.