



## Town of Nantucket *Department of Public Works*

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Robert D. McNeil, III, P.E., MPA • Director

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Dear Island Commercial Hazardous Waste Generator,

The Nantucket Department of Public Works (DPW), through its vendor Clean Harbors Waste Disposal Services, provides hazardous waste collection for FREE for residential generators and DEP-registered and -compliant Very Small Quantity Commercial Generators (VSQG) only.

### Massachusetts Department of Environmental Protection

#### Hazardous Waste Generator Classifications & Limits

Very Small (VSQG)	Small (SQG)	Large (LQG)
Generates less than 220 pounds (about 27 gallons) of hazardous waste or waste oil per month and no acutely hazardous waste.	Generates between 220 and 2,200 pounds per month (roughly 27 to 270 gallons), and/or up to 1 kilogram (2.2 pounds) of acutely hazardous waste per month.	Generates more than 2,200 pounds (about 270 gallons) and/or more than 1 kilogram (2.2 pounds) of acutely hazardous waste per month.
May accumulate up to 2,200 pounds (about 270 gallons) for an indefinite period of time.	May accumulate up to 13,200 pounds (1,500 to 1,620 gallons) for no more than 180 days.	May accumulate any quantity on-site, but must ship it within 90 days.

To participate in the DPW's hazardous waste collections, commercial VSQGs must be registered with the Massachusetts Department of Environmental Protection (DEP) and be in compliance with all DEP requirements, including the Massachusetts Hazardous Waste Regulations (310 CMR 30.00), summarized in the attached DEP document: *A Summary of Requirements for Very Small Quantity Generator of Hazardous Waste (VSQGs)*. Under state and federal law, a facility that generates hazardous waste bears "cradle-to-grave" responsibility for the waste's creation, handling, transport, treatment and ultimate fate. <https://www.mass.gov/hazardous-waste-management>

To register as a VSQG, you must obtain a Hazardous Waste Generator Number (EPA ID) via the U.S. Environmental Protection Agency (EPA) RCRAInfo/myRCRAid system. If you are a new user, you will need to create an account first.

<https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>

Very Truly Yours,

Robert D. McNeil, III  
Director



# COMPLIANCE ASSISTANCE GUIDE

\* for generators of hazardous waste \*

This Guide is meant to help you if your business generates waste oil or other hazardous waste in Massachusetts. This Guide outlines some key steps you can take to make sure you comply with the rules for businesses that generate hazardous waste. If you have questions about these or other environmental matters, please use the contact information and links at the end of this Guide.

- 1) **Determine whether your waste is hazardous.** This is a crucial first step in the proper management of hazardous waste. There are two ways a waste may be identified as hazardous. Your waste may be *listed* in the Hazardous Waste regulations (310 CMR 30.131-136) or it may be defined by its hazardous *characteristic* (ignitability, corrosivity, reactivity, toxicity). Waste oil is a regulated hazardous waste in Massachusetts.
- 2) **Determine your generator status.** Your generator status is a designation that is determined by two activities: the *rate* at which you generate hazardous waste and *how much* you store (accumulate). Based on these factors, you may be classified as a very small (VSQG), small (SQG), or large quantity generator (LQG) of hazardous waste. The following table provides an overview of generator status requirements.

	Very Small Quantity (VSQG)	Small Quantity (SQG)	Large Quantity (LQG)
<b>Total Waste Generated (Monthly)</b>	Less than 100 kg	>100 kg and <1000 kg	>1000 kg
<b>Acutely Hazardous Waste</b>	None allowed	Less than 1 kg (2.2 lbs)	More than 1 kg
<b>Accumulation Limit</b>	Up to 1000 kg	Up to 6000 kg	No limit
<b>Storage Time Limit</b>	No time limit	Up to 180 days	Up to 90 days

NOTE: 100 kg = 220 pounds = 25 to 27 gallons (the actual weight and volume depends on the type of material)

- 3) **Obtain a hazardous waste identification number.** If you operate a business that generates hazardous waste or waste oil, you must register with MassDEP to obtain a permanent identification number for legally generating and accumulating waste. Without this generator identification number, your waste will not be accepted by a licensed hauler or treatment/storage/disposal facility. Use only the number designated for your facility location.
- 4) **Comply with accumulation area standards.**
  - a. Above-ground tanks and containers must be on a surface which does not have any cracks or gaps and is impervious to the hazardous wastes being stored. If containers are stacked, they must be stacked on pallets.
  - b. Area must be secured against unauthorized entry.
  - c. Area must be clearly marked (e.g., by a visible line or tape, or by a fence) and be separate from any locations where hazardous waste is generated.
  - d. Area must be posted with a sign: "HAZARDOUS WASTE" in capital letters at least one inch high.
  - e. An **outdoor** area must have secondary containment, such as a berm or dike, which will hold any spill or leaks at *either* 10% of the total volume of the containers *or* 110% of the volume of the largest container, whichever is larger. Any spillage must be promptly removed.

5) **Comply with standards for containers and tanks.**

- a. Each container and tank must be clearly and visibly labeled throughout the period of accumulation with the following:
  - the words "HAZARDOUS WASTE"
  - the name of the waste (e.g., waste oil, acetone)
  - the type of hazard(s) (e.g., ignitable, toxic, corrosive or reactive)
  - the date on which accumulation began (SQG and LQG Only)
- b. Each container must be in good condition.
- c. Wastes of different types must be segregated.
  - Do not mix waste oil or used fuel oil with other wastes.
  - Do not put incompatible wastes (that may react with one another) in the same container.
  - Do not put wastes in unwashed containers that previously held incompatible wastes.
- d. Separate containers of incompatible wastes by a berm, dike, or similar structure.
- e. Each container holding hazardous wastes must be tightly closed throughout the period of accumulation, except when the waste is being added or removed.
- f. Containers holding ignitable or reactive wastes must be at least 15 meters (50 feet) from the property line. If this is not possible or practical, you must store such containers in compliance with all applicable local ordinances and by-laws. (SQG and LQG Only)
- g. Inspect your accumulation area at least once a week for any leaking or deterioration of your containers. You must have enough aisle space between your containers to allow for inspections. (SQG and LQG Only)

6) **Ship hazardous waste appropriately.** In Massachusetts, every shipment of hazardous waste by a large or small generator must be:

- a. transported by a company licensed to haul hazardous waste and sent to:
  - i. a licensed treatment, storage or disposal facility (TSDF) or
  - ii. a permitted recycling facility, and
- b. accompanied by a shipping document, called the Uniform Hazardous Waste Manifest.
- c. If you are a VSQG and are not using a licensed transporter, but are transporting your own wastes, you may use (but are not required to use) a manifest form. You must, however, keep a record of the type and quantity, as well as the date, of the transport and treatment or disposal of your waste. You will need proof of the receipt of the waste by the facility or generator. You must keep receipts or manifests of waste shipped and records of waste analysis for at least 3 years.

**Contact Information and Links:**

- Helpful information and guidance about Massachusetts' Hazardous Waste Program at: <http://www.mass.gov/eea/agencies/massdep/recycle/hazardous/>
- Hazardous Waste Regulations (310 CMR 30.000) at: <http://www.mass.gov/eea/agencies/massdep/recycle/regulations/310-cmr-30-000.html>), or order an official copy from the State Bookstore in Boston (617-727-2834) or Springfield (413-784-1376).
- Call the MassDEP Hazardous Waste Compliance Assistance Line: 617-292-5898.
- Contact the MassDEP Northeast Regional Office at 205B Lowell Street, Wilmington, MA 01887 (<http://www.mass.gov/eea/agencies/massdep/about/contacts/northeast-region.html>), or by telephone at 978-694-3200.

# **A Summary of Requirements for Very Small Quantity Generator of Hazardous Waste (VSQGs)**

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## **Introduction**

If your facility uses cleaning solvents, oils, inks, paints, acids or alkalines, it is probably generating hazardous waste with one or more of these characteristics:

- Ignitable (catches fire easily, with a flash point lower than 140°F)
- Corrosive (very acidic or basic, with a pH of less than 2.0 or more than 12.5)
- Reactive (unstable, reacts violently with water, potentially explosive)
- Toxic (leaches contaminants into the environment), or
- Listed specifically as "hazardous" by the Massachusetts Department of Environmental Protection (MassDEP).

MassDEP regulations (310 CMR 30.000: Massachusetts Hazardous Waste Regulations) require businesses that generate any of these wastes to properly identify and safely manage them, and to track them from where they are generated to their ultimate destination for recycling, treatment, or disposal.

Facilities generating smaller quantities of hazardous waste are given more compliance flexibility than generators of larger quantities, but still need to safely manage wastes and prevent releases to the environment. You can take advantage of this regulatory flexibility by minimizing the amount of hazardous waste you generate. Use non-hazardous substitutes and reuse or recycle hazardous wastes wherever possible.

## **Hazardous Waste Generator Status & Storage Limits**

Your status determines how much waste you may accumulate at your site at one time and how quickly you need to ship it off-site for recycling or disposal.

- If you generate less than 220 pounds (approximately 27 gallons) of hazardous waste or waste oil per month and no acutely hazardous waste, you may register with (MassDEP) as a Very Small Quantity Generator (VSQG). As a VSQG, you may accumulate up to 2,200 pounds (about 270 gallons) for an indefinite period of time.
- If you generate between 220 and 2,200 pounds per month (approximately 27 to 270 gallons), and/or up to 1 kilogram (2.2 pounds) of acutely hazardous waste per month, you are a Small Quantity Generator (SQG) and may accumulate up to 13,200 pounds (1,500 to 1,620 gallons) for no more than 180 days.
- If you generate more than 2,200 pounds (approximately 270 gallons) and/or more than 1 kilogram (2.2 pounds) of acutely hazardous waste per month, you are a Large Quantity Generator (LQG). You may accumulate any quantity on-site, but must ship it within 90 days. Please minimize your waste to the best of your ability.

Note: The same numerical thresholds apply to both hazardous waste and waste oil. You may register separately and maintain different generator status for each, depending on the quantities you generate.

## Notification Requirements

Before generating, accumulating, or shipping any hazardous waste and/or waste oil, you must notify MassDEP of your hazardous waste activities by using the U.S. Environmental Protection Agency (EPA) myRCRAid industry application to obtain an identification number (EPA ID).

Find the link here: <https://www.mass.gov/service-details/massdep-hazardous-waste-forms#hazardous-waste-generator-ids-and-manifests>

You may also use myRCRAid to notify MassDEP that you are relocating, discontinuing your hazardous waste activities, or reporting a change in ownership.

## Very Small Quantity Generator (VSQG) Requirements

As a VSQG, you must:

- Never accumulate more than 1,000 kilograms (approximately 2,200 pounds or 270 gallons) of hazardous waste or waste oil at any one time.
- Store hazardous wastes on an outdoor impervious surface with a secondary containment area or an indoor impervious surface that is not adjacent to a floor drain or other point of discharge to the outdoor environment.
- Secure the storage area against unauthorized access and post it with Hazardous Waste signs.
- Keep each storage container in good condition and label it Hazardous Waste with the name of the waste (e.g., toluene, acetone) and its associated hazard(s) (e.g., corrosive, ignitable, toxic).
- Retain records of the type and quantity of waste you generate, and the date and method of treatment, recycling or disposal
- Obtain receipts when you self-transport waste and keep copies of manifests for shipments sent off-site.

## Transfer, Treatment & Disposal Options

As a registered VSQG, you may:

- Recycle or treat your own waste, provided the process you describe in your registration is acceptable to MassDEP. (Note: Thermal treatment such as incineration or vaporization is not allowed.)
- Use a licensed transporter and manifest (requires EPA ID) when sending your wastes to a MassDEP licensed or approved hazardous waste treatment, storage, disposal or recycling facility.
- Transport your own waste to another generator that will count your waste with its own, or to a licensed treatment, storage or disposal facility, permitted recycling facility, or community hazardous waste collection center with the operator's permission.

## Special Self-Transport Requirements

As a registered VSQG, you may transport your own hazardous waste\* if you:

- Transport no more than 55 gallons at one time and keep a copy of your VSQG registration in the vehicle.
- Do not transport incompatible wastes (e.g., alkaline cleaner and battery acid) simultaneously.
- Keep waste containers tightly sealed, properly labeled (see above), and firmly secured to the vehicle.
- Meet all applicable U.S. Department of Transportation (DOT) and Massachusetts Department of Public Safety (DPS) shipping restrictions and container, label, placard and permit requirements. Contact the federal Motor Carrier Safety Administration (617-494-2770) and the State Fire Marshall's Office (978-567-3300) for details.
- Call the 24-hour MassDEP Emergency Response Line at 888-304-1133 in the event of a leak or spill. Look up reporting thresholds at:  
<http://eeaonline.eea.state.ma.us/DEP/MOMHL/hazmat.aspx>

*\* If you are both a VSQG of hazardous waste and an SQG of waste oil, you may not self-transport waste oil.*

## For More Information

- Call the MassDEP Business Compliance Assistance Line: 617-292-5898.
- See <https://www.census.gov/eos/www/naics/> for information about North American Industry Classification System (NAIC) codes.