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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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8. Small Quantity Generators, 100-1000 kg/month generators, and the Manifest

A small quantity generator (SQG) of less than 100 kg/month sends the waste to a facility which is registered by the State to manage (store) solid wastes. This State-registered storage facility accepts wastes from other small quantity generators of less than 100 kg/month and after collecting enough waste for a bulk shipment (over 1000 kg), sends it to a facility for disposal.

- (a) Is manifesting required at all in this scenario? If so, at what point?
- (b) Must the final disposal site be a RCRA permitted disposal facility?
- (c) If the small quantity generators generated between 100-1000 kg/month, how would the scenario be affected?
 - (a) No manifesting is required in this scenario. The hazardous waste itself is excluded from regulation under Parts 262 to 265, 270, and 124, so that manifesting is not required of any party who stores, treats, or disposes of the waste.
 - (b) The final disposal site need not be a RCRA permitted disposal facility. Section 261.5(g)(3) allows SQGs to send their waste to a facility which is registered by the State to manage solid wastes and still remain exempt from full regulation.
 - (c) If the waste was generated by 100-1000 kg/month generators, manifesting would be required to the State-registered solid waste storage facility as well as to the State-registered disposal facility. In addition, until March 31, 1986, the waste may be disposed of in a State registered disposal facility. After March 1986, the final disposal site must be a RCRA permitted (or interim status) facility.

Source: Barry Stoll (202) 382-4761