

QUESTION: A small quantity generator (SQG) who always generates less than 1000 kg. of hazardous waste per month exceeds his 1000 kg. accumulation limit and consequently dates and marks "Hazardous Waste" on the drums per 261.5(f). During the 90-day accumulation period, additional small quantities of waste are generated and these partially full drums are assigned accumulation start dates. The original 1000 kg. of regulated waste is shipped off-site while the partially full drums remain. Can the SQG remove or cover the dates and markings on the partially full drums?

ANSWER: No; any waste generated and accumulated after the SQG accumulation limit is exceeded is also subject to 262 regulation because the total accumulation is still above the SQG limit. Even when the original 1000 kg. of regulated waste is shipped off-site, the remaining partially full drums are still regulated and must be removed within their respective 90-day limits per 261.5(f). Hence, the start dates and "Hazardous Waste" markings cannot be removed or covered.

SOURCE: Jacqui Sales  
RESEARCH: Tom Gainer