

9452.1985(01)

## RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JUNE 85

### Small Quantity Generators

4. International Fabricare is a trade association that represents dry cleaning and laundry establishments. This industry will be affected by the new Small Quantity Generator (SQG) program pursuant to the Hazardous and Solid Waste Amendments (HSWA) of 1984 (P.L. 98-616). Starting August 5, 1985, SQGs generating between 100 kg and 1000 kg per month must accompany hazardous waste shipments with a Uniform Hazardous Waste Manifest. One of the items on the manifest that must be completed is item 12, "containers." "Containers" specifies the number and type of containers. On designating the container type, the SQG completing the manifest must select one of 12 types. Dry cleaners sometimes package and ship hazardous wastes in plastic bottles, similar to Clorox bottles. How should item 12 be completed?

Once a hazardous waste is packaged per DOT/EPA regulations, the container must be categorized according to item 12 on the manifest. A plastic bottle would be categorized as "DF." "DF" means fiberboard or plastic drums, barrels, or kegs. In obtaining and completing the manifest, the SQG should first contact the State regulatory agency responsible for hazardous waste management as provided in 40 CFR §262.21. The State agency will provide information regarding where to obtain the manifest and how to complete the portions required by the State, if any.

More importantly the SQG must package and label the hazardous waste according to DOT regulations specified in 49 CFR Parts 172, 173, 178, and 179. All RCRA hazardous wastes which are subject to 40 CFR Part 262 manifest requirements are also hazardous materials subject to DOT shipping requirements (40 CFR §263.10). In complying with DOT requirements, technical assistance is available from DOT by calling the Office of Hazardous Materials Regulations, Materials Transportation Bureau at (202) 426-2075.

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