



Lids, Leaks, & Labels: Compliance for Small Quantity Generators (SQGs)

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Objectives

- Understanding the term “Generator”
- Overview of Requirements for SQGs
- Compliance Tips
- Unified Program/CERS Violation Library
- Hands on activity
- 2022 Most common violations
- Resources & Generator Improvement Rule (GIR)



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What is a Generator?

- Is it a waste? Is it a hazardous waste (HW)?
- Did I generate it?
- Definition: In California Code of Regulations title 22 (22 CCR) section 66260.10, a Generator is defined as *“any person, by site, whose act or process produces HW (identified or listed in the HW regulations) - OR - whose act first causes a HW to become subject to regulation.”*



Types of Generators

- **Small Quantity Generators (SQG)** – Less than 1,000 kg (2200 lbs) of non-acute hazardous waste in a calendar month.
------(Accumulation limit 6000 kg or 1 kg acute/extremely)-----
- **Very Small Quantity Generators (VSQG)*** – *Less than, or equal to, 100 kg (220 lbs) of non-acute hazardous waste in a calendar month.*Once GIR is adopted, California will recognize VSQG.*
- **RCRA (federally-regulated) or non-RCRA (only HW in California)**
- **Large Quantity Generators (LQG)** – 1,000 kg (2200 lbs) or more of non-acute hazardous waste in a calendar month.

<https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/05/California-Generator-Chart.pdf>



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Does Universal Waste (UW) Count?

- Properly managed UW should not be counted when determining monthly generator status.
- Poses lower risk, but still a subset of hazardous waste.
- Batteries, lamps, electronic devices, CRTs, CRT glass, mercury wastes, non-empty aerosol cans, photovoltaic modules.
- The UW Rule allows transporting, handling, and recycling UW under relaxed rules and regulations.



Requirements for Hazardous Waste SQGs

- Waste determination/Universal waste
- Accumulation time limits
- Emergency procedures & contingency plans
- Container management (labeling, closed, etc.)
- Employee training
- Shipment of HW & recordkeeping
- ID Number, CUPA permits, CERS reporting, fees



Waste Determination/Classification



ALL HAZARDOUS WASTES, BOTH STATE AND FEDERAL

TTLIC
mg/kg
STLC
mg/l

TCLP
mg/l

California State "NON-RCRA"

1. Exceeds Limits 

2. Calc. $\div \pm$ LD 50 < 2500ppm, Rat Oral

LD 50

3. Calc. $\div \pm$ LD 50 < 4300ppm, Rabbit, skin

LD 50

4. Calc. $\div \pm$ LD 50 < 10,000ppm, Rat, Inhalation

LD 50

5. Fish Bio. Assay  < 500ppm

6. 16 OSHA Carcinogens OSHA "C"

Federal "RCRA"

Characteristics Codes

I D001 Ignitable

C D002 Corrosive

R D003 Reactive

T D004-D0043 Toxic

Listed Codes

K From specific

F From non-specific sources

U Unused Chemicals

P Unused acutely Toxic Chem

EPA/RCRA Waste Codes

CHARACTERISTIC WASTES

D CODE WASTES: Wastes that may or may not be on any of the Code lists above but possesses one or more of the characteristics of a hazardous waste.

LISTED HAZARDOUS WASTES

F CODE WASTES: Multiuse or non-specific source wastes.

Example—spent solvents

K CODE WASTES: Industry specific source wastes.

Example—wastewater sludge from the production of creosote

U CODE WASTES: Discarded commercial chemical products.

Example—Acetone

P CODE WASTES: Acutely hazardous commercial chemical products and off specification commercial products.

Example—Aldrin*

Ignitable **D001**

Corrosive **D002**

Reactive **D003**

Toxic **D004 through D043**

If your Haz Waste is generated in California, you will have a 3 digit California Haz Waste code.

i.e. 151—Asbestos

Non-RCRA (not federal) or State-regulated

Examples of non-RCRA or “California-only” hazardous waste:

- Used oil, oily debris, waste antifreeze, water-soluble wastes including paints.
- Mercury-containing wastes (may be universal waste).
- Corrosive solids.
- Toxic (except federal toxicity which is RCRA).
- NOT identified as a “characteristic” or “listed” EPA waste: ignitable, corrosive, reactive, federally toxic, listed-D,K,F,P,U.



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California EPA ID Numbers

California State EPA ID numbers are issued to people and businesses who generate the following:

- Less than 100 kg of RCRA hazardous waste per month.
- Less than 1 kg of RCRA *acutely* hazardous waste per month.
- Any amount of a non-RCRA hazardous waste per month.



DTSC Resources CA EPA ID Number

- DTSC's hazardous waste ID number general assistance line (800- 618-6942) and the eVQ System assistance line (1-877-454-4012) are open Monday-Friday 9a-3p.
- DTSC only accepts latest version of the CA EPA ID# application (12/2021).

<https://dtsc.ca.gov/wp-content/uploads/sites/31/2021/07/Information-for-Hazardous-Waste-Permanent-ID-Number-Holders.pdf>



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Federal EPA ID Number

- If you generate more than 1 kg of RCRA acutely hazardous waste per month or more than 100 kg of other RCRA waste per month, you must get a federal EPA ID Number.
- If you generate 100 kg or less of RCRA waste or 1 kg or less per month of acutely hazardous waste, you are exempted from having a federal EPA ID Number.



Federal EPA ID Number

- SQGs of RCRA waste must re-notify EPA of their hazardous waste activities every 4 years either electronically or paper EPA Form 8700-12.
- EPA encourages SQGs to use MyRCRAID to re-notify online.

<https://www.epa.gov/hwgenerators/re-notification-requirement-small-quantity-generators>



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Accumulation Time

- Generators producing more than 100 kilograms (220 pounds) and less than 1,000 kilograms (2,200) pounds per month for all hazardous waste generated onsite must properly ship waste offsite within 180 days of the first drop.
- Generators producing less than 100 kg per month of all hazardous wastes generated, must ship waste offsite 180 days from the date 100 kg is accumulated.

<https://dtsc.ca.gov/accumulating-hazardous-wastes-at-generator-sites/#table%20title>

Can Generators “accumulate” or “store” waste?



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SQGs Emergency/Contingency Planning

- Must be emergency coordinator on premises or on call.
- Post the following information next to phone:
 - Name and phone number of emergency coordinator
 - Location of fire extinguishers, spill control material, etc.
 - Telephone number of fire department.
- Emergency coordinator must respond to any emergencies, implement contingency plan, immediately report releases to surface water/storm drains.
- GIR adoption will add more requirements for SQGs.



Hazardous Waste Tracking System (HWTS)

Type into your browser: **hwts.dtsc.ca.gov**



Department of Toxic Substances Control

Go to ID Profile



Contact Us



Settings



Hazardous Waste Tracking System



Handler Search



Reports



ID Number



Log In

Search by ID Number or Handler Name



8,388

ID Numbers Issued in 2024

50,648

Manifests Reported in 2024

170,479

Tons of Waste Handled in 2024

The word "Handler" on this site refers to any hazardous waste generator, transporter, universal waste handler, or permitted treatment, storage, transfer, or disposal facility that handles hazardous waste.

What is HWTS?

The Hazardous Waste Tracking System (HWTS) is the California Department of Toxic Substances Control's (DTSC) data repository for

Related Links

[U.S. EPA's Electronic Manifest \(e-Manifest\) System](#)

The e-Manifest System was established by the United States Environmental

Are you ready for a CUPA inspection?

- Violation Library has 99% of requirements
- Your UPA Inspection Checklist
- DTSC website
- EPA website
- CUPA websites
- Online resources



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A19 Hazardous Waste Generator				
Violation Program	Violation Type Number	Name	Description	Citation
Hazardous Waste Generator	3010030	Small Quantity Generator: Hazardous Waste Manifest Exception Reporting	Failure to determine the status of any hazardous waste if a signed copy of the manifest isn't received within 35 days of the date the waste was accepted by the initial transporter and/or to submit an Exception Report to DTSC if a signed copy of the manifest isn't received within 60 days of the date the waste was accepted by the initial transporter.	22 CCR 6626
Hazardous Waste Generator	3010036	General: Electronic data	Failure to report, and report accurately, program data (such as hazardous waste generation activities) electronically.	27 CCR 6.11
Hazardous Waste Generator	3010037	Universal Waste Aerosol Can Processing	Failure to notify the CUPA of aerosol can processing procedures prior to commencement of operations	HSC 130.000
Hazardous Waste Generator	3020	General	Hazardous Waste Generator Program - Training - General	22 CCR 265;
Hazardous Waste Generator	3030001	Hazardous Waste Generator: Management of Spent Vehicle Lead-Acid Batteries	Failure to meet the spent lead acid battery management requirements, when handling, storing, or transporting more than 10 lead acid batteries at any one time.	22 CCR 265;
Hazardous Waste Generator	3030002	Hazardous Waste Generator: Management of 11 or More Spent Vehicle Lead-Acid Batteries	Failure of facilities that accept spent lead acid batteries in change or partial exchange for operable lead-acid storage batteries to comply with the following storage requirements : 1) Storing more than one ton of spent batteries at any one location for more than 180 days. 2) Storing one ton or less of spent batteries at any one location for more than one year, or 3) Removing the electrolyte.	22 CCR 265;
Hazardous Waste Generator	3030003	Hazardous Waste Generator: Damaged Lead Battery Handling	Failure to properly manage, store, and label a damaged lead acid battery in a nonreactive, structurally secure, closed container, and/or failure to label damaged lead acid battery with the date that the first battery in the container was placed there with ink, paint or other weather-resistant material so as to minimize the release of acid and lead and to protect the environment.	22 CCR 265;

Over 60 requirements could be applicable to SQGs

Violation Library-California Environmental Reporting System

- 1)Go to CERS- cers.calepa.ca.gov
- 2)CERS Central box- Click on Regulators
- 3)Look for link to Violation Library under Quick Links for Regulator Users



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Violation Library-California Environmental Reporting System

CERS Business

Unified Program Violation Library

[CERS Data Registry](#) » Unified Program Violation Library

Instructions/Help

The Unified Program Violation Library is a repository of standard violation descriptions Unified Program Agencies (UPAs) may use in their field inspections, and **must** be used by Unified Program Agencies (UPA) when reporting violation detail data to the California Environmental Reporting System (CERS). UPAs must either report violation information directly into the CERS user interface or via machine-to-machine electronic data transfer (EDT). The violation library is reviewed and modified as necessary on an annual basis, using the [change management process](#). For more information about the Unified Program Violation Library please contact CalEPA Unified Program at CUPA@calepa.

The Unified Program Violation Library serves as a compilation of common violations for consistent reporting purposes only. The Unified Program Violation Library is not an exhaustive list of all violations and the inclusion, or non-inclusion, of any specific violation implies nothing and shall be construed as a policy statement, interpretation or guidance from CalEPA or any of its Boards, Departments or Offices. The Unified Program Violation Library is not a legal document containing any advice, and under no circumstances shall the State of California be liable for any actions taken or omissions made from reliance on any information contained herein.

[CERS Central Home Page](#)

Violation Name	<input type="text"/>	Violation Description	<input type="text"/>
Violation Type Number	<input type="text"/>	Violation Source	<input type="text" value="v"/>
Violation Program	<input type="text" value="v"/>	Violation Category	<input type="text" value="Select a Program v"/>
Begin Date Greater Than	<input type="text" value="v"/> 	End Date Less Than	<input type="text" value="v"/> 

Activity

- 1) Find a partner sitting next to you.
- 2) Discuss your top three generator violations.
- 3) Analyze why they are the top three.
- 4) Write down 3 ideas of how to prevent these violations.



CalEPA Data from CERS: Over 21,000 violations related to SQGs cited by UPAs statewide in 2022



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Important: Minor Violations Corrected

H&SC 25187.8(d) A notice to comply SHALL NOT be issued **for any minor violation which is corrected immediately in the presence of the inspector.**

Immediate compliance in that manner may be noted in the inspection report, but the facility shall not be subject to any further action by the department representative or by the authorized local officer or agency.



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Components of a Minor Violation

- Does not provide an economic benefit to violator
- Not willful
- Not negligent
- Not knowing
- Not chronic
- Not from a recalcitrant violator
- Not a Class II or Class I violation
- Does not pose a significant threat



Understanding Violation Classification

Unified Program
Violation Classification Guidance



<https://calepa.ca.gov/wp-content/uploads/sites/6/2020/06/Violation-Classification-Guidance-Document-accessible.pdf>



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Top Ten Generator Violations 2022



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Most Common Violations- 2022

10. Unable to demonstrate employees are thoroughly familiar with proper waste handling and emergency procedures

3020001 ~890 violations



Most Common Violations- 2022

9. Generator Program- No CUPA permit, did not pay CUPA fees, or other local ordinance violations

3015 ~1,000 violations



Most Common Violations- 2022

8. Did not maintain hazardous waste to prevent fires, explosions, releases, spills, or leaks.

3030030 ~1,130 violations



Most Common Violations- 2022

7. Did not properly manage
used oil filters

3030004 ~1,150 violations



Most Common Violations- 2022

6. Did not report hazardous waste generator information accurately in CERS.

3010036 ~1,190 violations



Most Common Violations- 2022

5. Open or mismanaged containers

3030017 ~1,850 violations



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Most Common Violations- 2022

4. Hazardous waste accumulated too long

3030010 2,130 violations



Most Common Violations

3. Generating or accumulating hazardous waste without a valid EPA ID number.

3010002 ~2,580 violations



Most Common Violations- 2022

2. Did not keep records showing proper disposal of hazardous waste for the past 3 years.

3010010 ~2,720 violations



Most Common Violations- 2022

1. Inadequate labeling-
containers or portable tanks

3030007 ~6,500 violations



What is graduated enforcement?

- Repeat or chronic violations
- Compliance history
- Informal and formal enforcement

READ Applicable sections of Title 22 CCR (state regs), Title 40 CFR (federal regs), and the California Health & Safety Code (the law)



Preventing violations

- Know what you have
- Label and close containers
- Do weekly inspections/check CERS & EPA ID#
- Keep a binder for records, check HWTS
- “Accumulation” NOT storage
- Clean up spills and solve leaks asap
- Train effectively, especially new employees



Generator Improvement Rule 2024?

The following provisions have been identified by DTSC as mandatory provisions that will be adopted in the first regular rulemaking package:

- Reorganization/Streamlining/Definitions/New numbers.
- A re-notification (federal EPA ID#) requirement every 4 yrs.
- Increased requirements for satellite accumulation areas.
- New requirements added to the preparedness, prevention, and emergency procedures for SQGs including:
 - Documenting those arrangements with local authorities were made or attempted to be made by the generator.



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Regulatory Updates- Monthly Unified Program Newsletters

- 1) Go to CERS- cers.calepa.ca.gov
- 2) CERS Central box- Click on Resources
- 3) Click on link Unified Program Bulletins, Policy Memos, Guidance Letters
- 4) Unified Program Links box, click on Unified Program Publications and Forms
- 5) Click on Newsletters



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Regulatory Updates- Monthly Unified Program Newsletters



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Welcome to the California Environmental Reporting System (CERS)

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Regulator Training Portal Sign In

CERS Stale User Account Deletion

A CERS regulator or business user account that has been inactive for 1 or more years is considered a stale account. Stale accounts pose a security risk as each accounts offers a malicious actor opportunity to gain access to CERS. To comply with CalEPA's Information Security policies, any CERS



CERS Central

[Businesses](#)

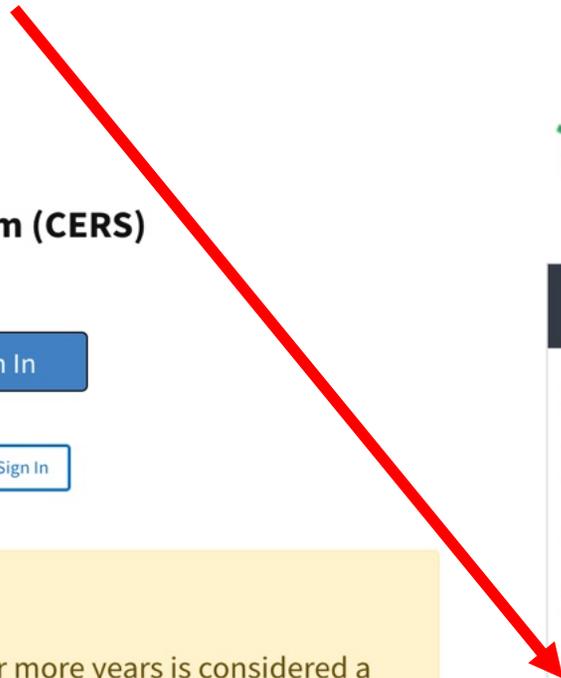
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Questions?

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