



## Quick Guide for Very Small Quantity Generators of Hazardous Waste

You are considered a Very Small Quantity Generator (VSQG) if you generate no more than 100 kg (220 lbs) of non-acute hazardous waste and no more than 1 kg (2.2 lbs) of acutely hazardous waste per calendar month.

### Summary of VSQG Requirements\*

Some requirements have changed due to an update of Nevada’s hazardous waste regulations adopted on **August 25, 2020** and are indicated with a superscript and explained in detail below the table.

Requirement	Application for VSQG	Federal Citation ( <a href="#">40 CFR</a> )
EPA ID Number <sup>1</sup>	Not Required	
Re-notification	Not Required	
On-site accumulation quantity limit without RCRA permit	≤1000 kg or ≤1 kg of acute hazardous waste, <100 kg/mo. acute cleanup residue	262.14(a)(3) and (4)
On-site accumulation time limit without RCRA permit	No Limit	262.14
Personnel Training	Not Required	
Contingency Plan & Quick Reference Guide	Not Required	
Preparedness and Prevention	Not Required	
Land Disposal Restrictions	Not Required	
Manifests <sup>2</sup>	Not Required	
Labeling for shipment off-site	Only if required by the DOT	
Biennial Report	Not Required	
Exception report	Not Required	
Recordkeeping	Not Required	
Off-site shipments	Must be sent to a person or facility who is authorized to manage it	262.14(a)(5)
Hazardous Waste Determinations <sup>3</sup>	Must be made at point of generation	262.11
Closure	Not Required	

\* This is only a summary and does not include all VSQG requirements.

- EPA ID NUMBER.** VSQGs are not required to obtain an EPA ID number; However, to utilize the [Alternative Standards for Episodic Generation](#) under the Generator Improvements Rule, an EPA ID number is required.
- MANIFESTS.** VSQGs are not required to use manifests; However, to utilize the [Alternative Standards for Episodic Generation](#) under the Generator Improvements Rule, the use of manifests is required. If a VSQG utilizes a hazardous waste manifest, a copy of the manifest is no longer required to be submitted to the State. Generators are encouraged to use the [electronic manifest system](#) to track shipments of hazardous waste.
- HAZARDOUS WASTE DETERMINATIONS.** Under the Generator Improvements Rule, five changes were made to the hazardous waste determination requirements for VSQGs (40 CFR 262.11). The Generator Improvements Rule:
  - Specifies that the solid and hazardous waste determination be accurate and expands on why the hazardous waste determination is important; i.e., to ensure the proper management of the waste within the RCRA framework;
  - Requires the hazardous waste determination for each solid waste be made at the point of waste generation, before any dilution, mixing, or other alteration of the waste occurs, and at any time during its management that it has, or may have, changed its properties because of exposure to the environment or other factors, such that its waste classification may have changed;
  - Incorporates regulatory language that elaborates on how to make a hazardous waste determination for listed and characteristic hazardous waste; and
  - References the applicable RCRA regulations for identifying possible exclusions or exemptions for the hazardous waste in 40 CFR section 262.11(e).

## Did you know...

With the adoption of the Generator Improvements Rule, Nevada now allows regulated facilities to use the Alternative Standards for Episodic Generation and the VSQG/LQG Consolidation Exemption.

**40 CFR 262.13(c)(8)** states that hazardous waste managed as part of an episodic event does not have to be counted toward a generator's category. An "episodic event" means an activity or activities, either planned or unplanned, that does not normally occur during generator operations, resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category.

VSQGs must manage the waste in a manner that minimizes the possibility of a fire, explosion, or release and Small Quantity Generators must manage the waste under the container and tank standards in 40 CFR section 262.16. All generators must label the waste with the words "Episodic Hazardous Waste," with a word, placard or pictogram that identifies what the hazards are that the waste poses, and with the start date of the episodic event. Find the complete Alternative Standards for Episodic Generation at [40 CFR Subpart L](#).

**40 CFR 262.17(f)** states that Large Quantity Generators may accumulate on site hazardous waste received from VSQGs under control of the same person, as defined in § 260.10, without a storage permit. "Control," for the purposes of this section, means the power to direct the policies of the generator, whether by the ownership of stock, voting rights, or otherwise, except that contractors who operate generator facilities on behalf of a different person shall not be deemed to "control" such generators. Find the complete list of requirements to use the exemption at [40 CFR 262.17\(f\)](#).

## Universal Waste:

If you are a VSQG and manage waste that includes [batteries](#), pesticides, mercury-containing equipment, and/or [lamps](#), your facility may be eligible for exemptions under the [universal waste regulations](#) if you meet all of the streamlined requirements. **Aerosol cans CANNOT be managed under the universal waste regulations in Nevada.** Once subject to the universal waste regulations, universal wastes do not need to be counted toward a generator's status. Materials managed as universal waste can be stored for a year and are not required to be shipped with a manifest or by a hazardous waste transporter. A large quantity handler of universal waste must keep a record of each shipment of universal waste received and sent and must retain those records for at least three years (40 CFR 273.39). Although it is not required for small quantity handlers of universal waste, it is recommended that you keep track of universal wastes sent off-site for recycling and keep receipts for at least three years (40 CFR 273.19).

## Source Reduction:

Since your generator status determines the number of requirements that legally apply to you, it is to your advantage to minimize the amount of hazardous waste you generate. This not only reduces the burden of regulations but can also reduce waste management costs and improve the competitiveness of your business. In many cases operating practices, including housekeeping and inventory control, can dramatically reduce waste generation and associated costs. Alternative, less-hazardous products can be found for many applications which can eliminate hazardous waste production, and production processes and service operations can be designed or modified to eliminate or reduce waste. For more information about source reduction techniques applicable to your business contact the [Business Environmental Program](#) at (800) 882-3233.

*Let's make sustainable attainable.*

For questions regarding Very Small Quantity Generator requirements, contact:

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