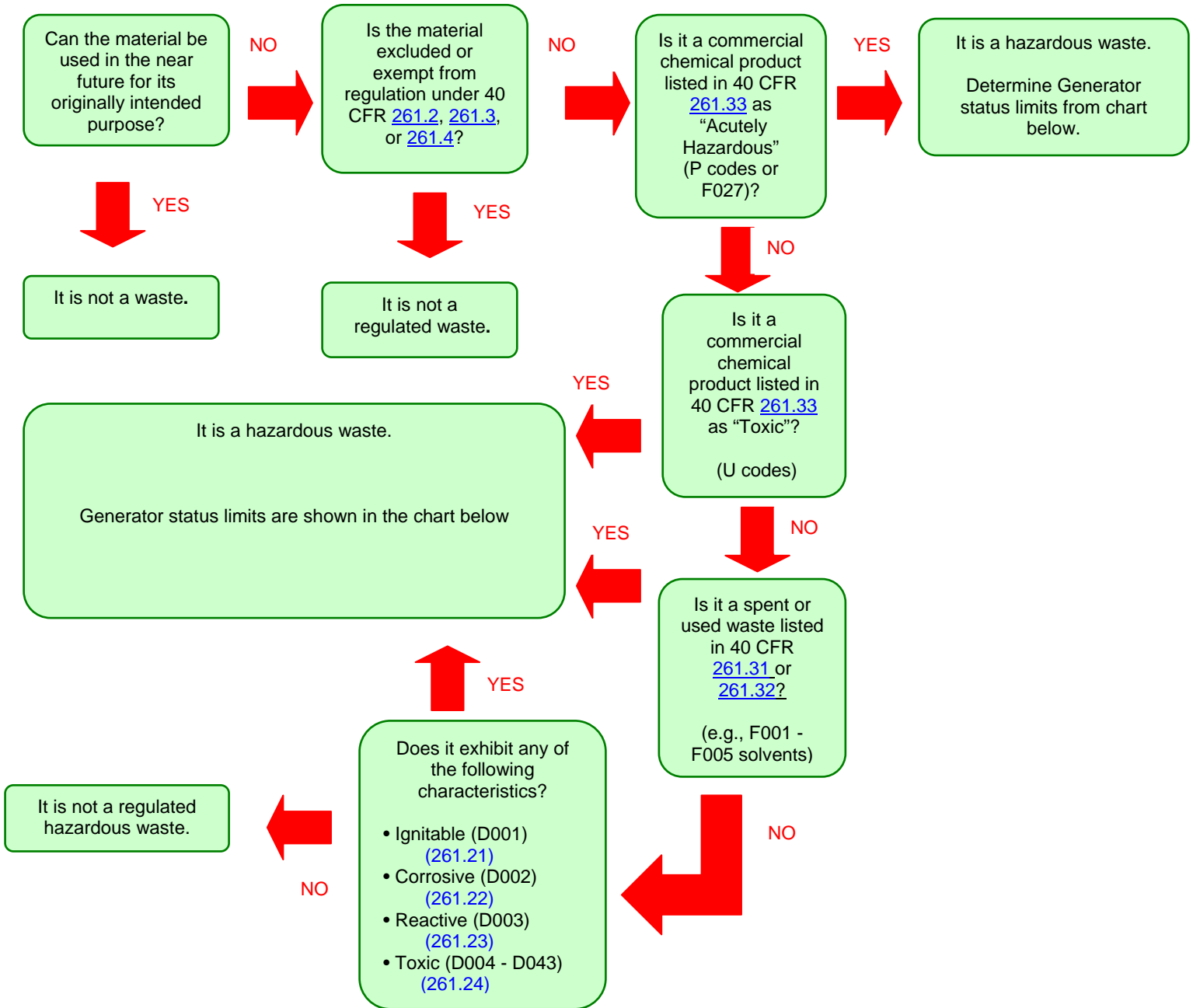


Waste Determination / Generator Status Roadmap



NOTES:

- 1) Generator must determine all applicable codes.
- 2) Containers:

Empty containers may be handled as non-hazardous solid waste if:

- Acutely hazardous waste containers have been triple rinsed with a suitable solvent;
- Other hazardous waste containers are drained and scraped to remove as much material as possible, but leave no more than 3% of capacity, or 1 inch of residue.

Rinsate and removed residue must be managed according to the roadmap.

**** This guidance does not substitute for RCRA's waste determination required in 40 CFR 262.11.**

Hazardous waste guidance can be found at www.epa.gov/aboutepa/region7.html

Universal Waste Handler and Hazardous Waste Generator Requirements

	Universal Waste		Hazardous Waste		
	SQHUV	LQHUV	CESQG	SQG	LQG
Quantity limit	< 5,000 kg on site §273.9	≥ 5,000 kg on site §273.9	≤ 100 kg/month ≤ 1 kg acute/month §261.5(a) and (e)	Between 100 and 1,000 kg/month §262.34(d)	≥ 1,000 kg/month or > 1 kg acute/month Part 262 and §261.5(e)
EPA Identification Number	Not required §273.12	Required §273.32	Not required §261.5	Required §262.12	Required §262.12
On-site accumulation limit	< 5,000 kg §273.9	No limit	≤ 1,000 kg ≤ 1 kg acute ≤ 100 kg spill residue from acute §261.5(f)(2) & (g)(2)	≤ 6,000 kg §262.34(d)(1)	No limit
Storage time limit	1 year, unless for proper recovery, treatment, or disposal §273.15	1 year, unless for proper recovery, treatment, or disposal §273.35	None §261.5	≤ 180 days or ≤ 270 days §262.34(d) & (e)	≤ 90 days §262.34(a)
Manifest	Not required §273.19	Not required, but must keep basic shipping records §273.39	Not required §261.5	Required §262.20	Required §262.20
Personnel training	Basic training §273.16	Basic training geared toward employee responsibilities §273.36	Not required §261.5	Basic training §262.34(d)	Full training (as outlined in §265.16) §262.34(a)

Universal Waste

SQHUV – Small Quantity Handler of Universal Waste

LQHUV – Large Quantity Handler of Universal Waste

Hazardous Waste

CESQG - Conditionally Exempt Small Quantity Generator

SQG - Small Quantity Generator

LQG - Large Quantity Generator

For a more detailed analysis, see [Hazardous Waste Generator Regulations: A User-Friendly Reference Document, May 2007 \(PDF\)](#)