



TOPIC: Generator Categories

The hazardous waste regulations define three categories of hazardous waste generators according to the amount of waste generated in a calendar month.

These categories are:

- Large Quantity Generators (LQG) (40 CFR 262.34(a))
- Small Quantity Generators (SQG) (40 CFR 262.34(d))
- Conditionally Exempt Small Quantity Generators (CESQG) (40 CFR 261.5)

These names are not generally found in the rules, but are commonly used to refer to the three categories.

Large Quantity Generators are also referred to as "Fully Regulated Generators" in 40 CFR 261.5(e), although this designation is not widely used.

Large Quantity Generators

Generators of more than 1000 kilograms per calendar month of hazardous wastes or more than 1 kg of acutely hazardous waste (i.e., waste codes denoted with the hazard code "H" and all P-listed wastes) are called large quantity generators (LQGs). There is no limit to the total amount of hazardous waste that can be generated per month at a site and remain in the category of a large quantity generator. Wastes from these generators are subject to full regulation under Part 262.

A large quantity generator can accumulate an unlimited amount of hazardous wastes on-site for 90 days. Thirty-day extensions to the 90-day limit may be granted by the agency in some cases. If a LQG keeps hazardous waste on-site for more than 90 days without an extension, the site is considered to be a storage facility and in violation of permitting and TSD requirements. It is a serious violation of the rules for generators to fail to observe accumulation time limits.

Small Quantity Generators

Generators of hazardous wastes in quantities of more than 100 kilograms per month, but less than 1,000 kilograms (2200 lbs or 4-5 drums) per month are called Small Quantity Generators (SQGs).

Hazardous wastes can be accumulated on-site by a SQG for 180 days. If the small quantity generator selects a TSD facility that is 200 miles or more from the site to manage the waste, the accumulation time limit is 270 days. Extensions of 30 days may be granted in some cases.

The maximum quantity of hazardous waste that a SQG can have on-site is 6,000 kilograms (13,200 lbs or 26 drums). If this limit or the accumulation time limit is exceeded, the SQG is

considered a storage facility, and is in violation of permitting and TSD requirements. Small quantity generators should carefully monitor these limits to avoid this violation.

Conditionally Exempt Small Quantity Generators

A site that generates or accumulates less than certain amounts of hazardous wastes is exempt from most of the management requirements for other generators. These sites are referred to as Conditionally Exempt Small Quantity Generators (CESQG) in the rules, and their requirements are found in 40 CFR 261.5.

A generator is a CESQG if the site generates, in a calendar month, no more than:

- 100 kilograms of hazardous wastes in that month (220 lbs or about ½ drum)
- 1 kilogram of acutely hazardous waste (AHW)
- 100 kilograms of any residue or contaminated soil, waste, or other debris resulting from the clean up of a spill, into or on any land or water, of any acute hazardous wastes (AHW)

The acute hazardous wastes are listed in 40 CFR 261.31, 261.32, or 261.33(e), and include the dioxin wastes F020-23, F026, and F027, and the "P" list wastes.

If a generator generates more than 100 kilograms (220 lbs) of hazardous waste in a month, or accumulates on-site at any time more than a total of 1000 kilograms (2200 lbs or 4-5 drums) of hazardous wastes, all of those wastes are subject to regulation as a small quantity generator.

If a generator accumulates on-site or generates acute hazardous waste in a calendar month in quantities greater than described above, all quantities of that waste are subject to full regulation as a hazardous waste. In this context, "full regulation," means those regulation applicable to large quantity generators.

To summarize, in order to remain a CESQG the generator must observe these limitations:

Amounts	Becomes subject to rules for:	
	SQG	LQG
Generation of hazardous wastes per month:		
More than 100 kg, but less than 1,000 kg.	X	
Equal or more than 1000 kg.		X
Generate acute hazardous wastes per month:		
More than 1 kilogram		X
More than 100 kilograms of clean-up material		X
Accumulate on-site:		
More than 1000 kg of hazardous wastes	X	
More than 1 kg of acute hazardous waste		X
More than 100 kilograms of AHW clean-up material		X

NOTE: *Small quantity generators* are also subject to regulation as a large quantity generator if they exceed any of the above limits on acute hazardous waste.

Episodic Generators

Generators may periodically exceed or fall below their normal generation limits in any given calendar month. If the amount of waste generated in a given calendar month places the generator in a different category, he or she is responsible for complying with all applicable requirements of that category for all waste generated during that calendar month. For example, if a generator produces 300 kg of hazardous waste in March, that waste must be managed in accordance with the SQG regulations; if the same generator produces 1,500 kg of hazardous waste in April, that waste must be managed in accordance with the LQG regulations.