



## Hazardous Waste Management in Connecticut

Hazardous wastes are a group of wastes that are subject to special handling requirements because their mismanagement may lead to serious hazards to human health and the environment. The mismanagement of these wastes can also bring about loss of property value or legal action against persons that mismanage them. **Many types of wastes can be classified as hazardous wastes, including some materials commonly generated at vehicle service facilities.** This section takes you through a step-by-step process to make sure that you are in compliance with hazardous waste requirements. Proper management of hazardous waste depends on a number of factors: determining which wastes are hazardous, determining your hazardous waste generator status, and then applying the correct requirements based on your hazardous waste generator status.

If you already know which of your wastes are hazardous and what your hazardous waste generator status is, then to Step Three for information on how to handle your hazardous waste.

### Step One: Determine Which of Your Wastes are Hazardous

Anyone who generates a waste is required by law to determine whether or not that waste is hazardous [40 CFR 262.11, RCRA Section 22a-449(c)-102(a)(2)(A)]. Some general knowledge about the basic characteristics of the wastes may be helpful in making this determination, but some laboratory testing is usually required. For more guidance on hazardous waste testing, see the list of DEEP documents at the end of this section, or call DEEP's Waste Engineering and Enforcement Division at 888-424-4193 for assistance.

There are two ways a waste may be considered a hazardous waste: (1) if it is Characteristically Hazardous, or (2) if it is a Listed as a hazardous waste.

Characteristically hazardous wastes are wastes that exhibit any one of the four characteristics listed in table on the following page. An abbreviated definition is given for each one. They are fully defined in the federal hazardous waste regulations [40 CFR 261.21 through 261.24]. Copies of these regulations may be obtained by contacting DEEP or through the [U.S. EPA's website](#). Characteristically hazardous wastes are identified by the letter "D" that begins their 4-digit EPA waste code.

Listed hazardous wastes (see table on next page) are wastes that are specifically identified in one of four lists developed by U.S. EPA in the federal hazardous waste regulations [40 CFR 261.31 through 261.33]. Each hazardous waste listing includes a description of a specific type of waste that EPA considers hazardous enough to warrant regulation. Hazardous waste listings describe wastes that are generated by certain industries, come from common industrial processes, or include specific chemical compounds as their main active ingredient. Several hundred specific solvents, metal finishing waste streams and sludges, pesticides, various

organic and inorganic chemicals and discarded commercial chemical products are included in these lists.

### Characteristically Hazardous Wastes (“D” Wastes)

Characteristic	Definition	Testing	Vehicle Service Facility examples
<b>Ignitability</b>	liquid wastes with a flash point lower than 140°F, ignitable solids, and materials that are designated by the U.S. DOT as oxidizers.	Laboratory certified by the CT Dept. of Public Health	<ul style="list-style-type: none"> <li>♦ paint and solvent wastes</li> <li>♦ waste gasoline</li> <li>♦ old road flares</li> </ul>
<b>Corrosivity</b>	liquid wastes with a pH less than or equal to 2.0, or greater than or equal to 12.5	The most accurate way to determine pH is with a laboratory test.	<ul style="list-style-type: none"> <li>♦ lead-acid batteries</li> <li>♦ waste muriatic acid</li> <li>♦ caustic paint strippers</li> <li>♦ old drain cleaners</li> </ul>
<b>Reactivity</b>	materials that are: normally unstable; react violently, explode, or emit toxic fumes when mixed with water; or, are capable of exploding at room temperature and pressure or when heated under confinement.	Laboratory certified by the CT Dept. of Public Health	<ul style="list-style-type: none"> <li>♦ non-empty aerosol cans</li> <li>♦ some hardening agents for body fillers and paints</li> <li>♦ un-deployed air bag canisters (contain sodium azide)</li> </ul>
<b>Toxicity</b>	materials containing greater than the regulated concentration of any of 40 contaminants listed in the federal hazardous waste regulations [40 CFR 261.24]	Determined at a certified lab by a test called the Toxicity Characteristic Leaching Procedure (TCLP)	<ul style="list-style-type: none"> <li>♦ lead-based paint chips</li> <li>♦ spent methyl ethyl ketone solvent</li> <li>♦ waste gasoline (contains benzene)</li> <li>♦ old containers of pesticides</li> </ul>

The four groups of listed hazardous wastes are easily identified by the letter that begins their 4-digit EPA waste code (i.e., “F,” “K,” “U,” or “P”). The four groups are classified as follows:

### Listed Hazardous Wastes

Listed Waste	Definition	Vehicle Service Facilities examples
"F" Wastes	wastes from certain common, non-specific industrial activities	<ul style="list-style-type: none"> <li>♦ spent chlorinated solvents (e.g., methylene chloride; 1,1,1-trichloroethane; perchloroethylene)</li> <li>♦ waste paint solvents (e.g., acetone, methyl alcohol, n-butyl alcohol, xylene, methyl ethyl ketone (MEK), methyl isobutyl ketone (MIBK), ethyl acetate)</li> </ul>
"K" Wastes	Wastes from certain specific industrial processes	Rarely, if ever, generated by vehicle service facilities
"U" and "P" Wastes	Discarded commercial chemical products, off-spec products, container residues, and spill residues of such products	Occasionally generated by vehicle service facilities <ul style="list-style-type: none"> <li>♦ certain old pesticides, solvents, and other chemical products</li> <li>♦ paints or hardeners with expired shelf life</li> </ul>

## Non-RCRA-Hazardous “Connecticut-Regulated” Wastes

If a waste is neither characteristically hazardous nor listed, then it is not subject to Connecticut’s hazardous waste requirements. However, under separate state law [CGS Section 22a-454], certain wastes may not be disposed of at regular solid waste (i.e., trash) disposal facilities, but must instead be sent to specially-permitted facilities that are equipped to handle industrial wastes. In general, the kinds of wastes that are subject to these special requirements include waste oils, petroleum or chemical liquids, and chemical solids (generally referred to collectively as “Connecticut-Regulated Wastes”).

<b>Examples of Connecticut-Regulated Waste that might be generated at a vehicle service facility</b>
<ul style="list-style-type: none"><li>• Non-hazardous absorbents (e.g., rags, wipers, mats, socks, and loose material such as speedi-dry) contaminated with oil, grease, cleaners, paints, solvents, etc.</li><li>• Non-hazardous antifreeze</li><li>• Non-hazardous waste paints and solvents</li><li>• Non-hazardous paint-related wastes (e.g., used masking paper and tape, cups and stirring sticks, spray booth filters, personal protective gear)</li><li>• Waste diesel fuel</li><li>• Used oil</li></ul>

These wastes cannot be placed in an on-site trash dumpster, but must instead be segregated and picked up by a [hauler that is permitted](#) to transport Connecticut-Regulated Wastes. However, there is an exemption from transporter permit requirements for “waste chemical solids” (e.g., dried non-hazardous paint or paint chips). Such wastes do not have to be hauled by a permitted transporter, but they must still be sent to a permitted storage treatment or disposal facility. If sent to a facility in Connecticut for treatment or disposal, this [facility must be permitted](#) to take Connecticut-Regulated Wastes. There are no requirements for generators of these materials, other than that they ensure that they are properly disposed. However, as a best management practice, store these materials in manner similar to that for hazardous waste (i.e., in secure, closed containers, in a storage area with an impervious base and secondary containment, etc.). When the material is shipped, the law does not require that the generator prepare a waste manifest. However, as a practical matter, generators will often find that their haulers will ask for one (either for their record keeping purposes, or because it is required under the receiving facility’s operating permit). For more information on Connecticut-Regulated Wastes, contact DEEP’s Waste Engineering and Enforcement Division at 888-424-4193 and ask for the fact sheet entitled “[Non-RCRA Hazardous Wastes \(Connecticut-Regulated Wastes\)](#)” or visit DEEP’s website and enter the name of the fact sheet in the search box to view it online.

## Testing Used Oil

Used oil is subject to some specific requirements. The Used Oil Fact Sheet outlines the steps for proper management. Testing requirements are outlined below.

When testing used oil for hazardous constituents, four steps must be taken in this order:

1. determine if it is mixed with any listed hazardous waste (if it is, it is automatically a hazardous waste);
2. determine if it has been mixed with any characteristic hazardous waste (if it has, it must be tested to determine if it is still characteristically hazardous);
3. test for total halogens (if the oil contains total halogens of greater than 1,000 parts per million (ppm), it must be managed as hazardous waste);
4. if the oil tested at over 1,000 ppm, you can rebut the presumption of mixing by having the oil tested for the presence of chlorinated solvents. If no listed hazardous waste solvent is present over 100 ppm, the oil does not have to be managed as hazardous waste.

Total halogen testing can be conducted in a laboratory, or facility personnel can test for total halogens using inexpensive, U.S. EPA-approved total halogen field-testing kits. These total halogen test kits are available from numerous sources, including industrial supply or health and safety supply companies.

The only test kits approved by the EPA are: CHLOR-D-TECT 1000 & CHLOR-D-TECT Q4000 (which are made by Dexsil Corp., Hamden, CT, [www.dexsil.com](http://www.dexsil.com)).

## **FREQUENTLY ASKED QUESTIONS ABOUT HAZARDOUS WASTE DETERMINATIONS**

***Q: I'm pretty sure that my waste is hazardous. Do I still have to test it?***

**A:** There are two “tools” that may be used to determine if a waste is hazardous. The first of these is analytical testing. The second is to use information about the source, nature and contaminants of the waste (i.e., so-called “knowledge of process” information). Common sources of knowledge of process information include Material Safety Data Sheets (MSDSs), product specification sheets, or analytical results from the testing of an identical waste stream generated at another site. Although knowledge of process information can be very useful (especially in identifying hazardous constituents that are known to be present), it typically is not adequate to fully and properly characterize a waste. In particular, knowledge of process cannot account for factors such as trace contaminants that may not be listed on a MSDS, contaminants introduced during use, and cross-contamination from other wastes. As a result, some sampling is typically required to properly characterize a waste.

***Q: Where can I get my waste tested?***

**A:** The Connecticut Department of Public Health licenses analytical laboratories in Connecticut, and several dozen of these labs are capable of doing hazardous waste testing. To get a list of these labs, call DEEP’s Waste Engineering and Enforcement Division at 888-424-4193. Many of these labs are also listed in the Yellow Pages under “Laboratories – Analytical” or on the [Connecticut Department of Public Health’s website](#).

***Q: How often do I have to test my wastes?***

**A:** Connecticut’s hazardous waste rules require that generators test their waste annually, or whenever there is a raw material or process change that could affect the waste. However, if a generator can document that a waste has not changed over time (such as by having several previous years’ analyses showing consistent testing results), this may constitute a valid basis on which to make a “knowledge of process” claim (see first question above).

***Q: What if my waste is hazardous for more than one thing?***

**A:** Some wastes can be hazardous for more than one characteristic, or can be both listed and characteristically hazardous. For example, waste gasoline might be hazardous for the ignitability characteristic AND exhibit the toxicity characteristic for benzene. Hazardous waste rules require generators to determine *all* the applicable waste codes that apply to a waste, and list them on the manifest when the waste is shipped off-site.

***Q: If my hauler tests the waste, do I have to test it, too?***

**A:** Oftentimes transporters and/or receiving facilities will test waste that they accept (either to confirm information provided by the generator, or because their operating permit requires them to perform certain testing for quality control purposes). If the transporter or receiving facility is willing to provide this information, the generator may use it in complying with hazardous waste determination requirements. However, it must be stressed that this kind of test data may not be adequate to fully characterize a waste, and additional testing or “knowledge of process” information may be needed to round out the waste determination.

## Step Two: Determine Your Hazardous Waste Generator Status

If, at the end of Step One, you have determined that you do not generate any hazardous wastes, then congratulations! You're done! If none of the wastes that you generate are hazardous (or if you can eliminate any hazardous wastes you do generate), then you do not have to comply with any hazardous waste requirements. You just need to keep records of your test results documenting that your wastes are non-hazardous.

However, if any of your wastes are hazardous, you must take some additional steps to determine the requirements that apply to your handling of these wastes. Generators of hazardous waste are subject to different requirements, depending on the amount of waste they generate and store on-site. There are three types of hazardous waste generators:

1. [Conditionally Exempt Small Quantity Generators \(CESQG\)](#): facilities generating less than 220 pounds (about 26 gallons) per month and accumulating no more than 2,200 pounds of hazardous waste on-site at any one time and that generate less than 2.2 pounds per month of acutely hazardous waste.\*
2. [Small Quantity Generators \(SQG\)](#): facilities generating between 220 and 2,200 pounds (about 26 to 260 gallons) per month and accumulating no more than 2,200 pounds on-site of hazardous waste at any one time and that generate less than 2.2 pounds per month of acutely hazardous waste.\*
3. [Large Quantity Generators \(LQG\)](#): facilities generating more than 2,200 pounds per month or accumulating more than 2,200 pounds on-site at any one time of hazardous waste, or that generate more than 2.2 pounds per month of acutely hazardous waste.\*

\*Acutely hazardous wastes are a subset of hazardous wastes that are particularly hazardous, and are therefore regulated in much smaller amounts than regular hazardous wastes. **Typically, the wastes generated by vehicle service facilities will not fall into this category**, although certain wastes may (for example, certain pesticides which are [“P-Listed” hazardous wastes](#)).

For more detailed information, call DEEP's Waste Engineering and Enforcement Division at 888-424-4193 and ask for the fact sheet, "[Hazardous Waste Generator Category](#)", which will help you determine what set of requirements you are subject to.

## Step Three: Properly Store and Dispose of Your Hazardous Waste

Once you have determined your generator status, the next step is to determine the requirements that apply, and ensure that your facility is in compliance with them. Table 1 at the end of this section provides an overview of the various requirements that apply based on generator status. Details on these requirements are provided on the following pages.

## Conditionally Exempt Small Quantity Generators (CESQGs)

CESQGs have the fewest requirements of the three hazardous waste generators. The requirements and best management practices (BMPs) for CESQGs are listed below. If you would like more information on these requirements and BMPs, contact DEEP's Waste Engineering and Enforcement Division at 888-424-4193 and ask for the . Several other helpful documents which are available are also listed at the end of [CESQG handbook](#) this section.



**Proper waste storage – closed, labeled drums stored inside with secondary containment**

In general, if you are a CESQG, then you must do the following:  
[RCSA Section 22a-449(c)-101(b), 40 CFR 261.5]

- Ensure that your waste is disposed of at a [permitted hazardous waste treatment or disposal facility](#), or at a household hazardous waste facility (or one-day collection event that is permitted to take CESQG waste). For more information about how to dispose of CESQG waste at a HHW collection event, see DEEP's [Small Business HW web page](#).
- If you hire a waste hauler to take away your waste, be sure that hauler has a valid U.S. EPA Identification number and [transporter's permit](#) to haul waste in Connecticut.
- Perform a hazardous waste determination on all the wastes you generate, and keep records of all test results and other information used to make these determinations for at least three years from the date that the waste was last sent off-site for disposal.
- Comply with Universal Waste requirements for any Universal Wastes that you generate. Universal Wastes are wastes that are subject to a special, reduced set of requirements in 40 CFR 273, and include batteries, recalled pesticides, mercury thermostats and switches, used electronics, fluorescent lights and other mercury-containing lamps (sodium vapor, metal halide and high intensity discharge lamps, including the blue-tinted HID headlamps). For information on Universal Waste requirements, call DEEP at 888-424-4193 and ask for the [Universal Waste Rule fact sheet](#).
- Remember: if at any time your waste generation or storage amounts increase beyond CESQG levels, you must comply with the requirements for the higher generator category.

### Best Management Practices (BMPs) for CESQGs:

- Look for ways to reduce or eliminate the generation of hazardous waste (see the table at the end of this appendix for "Hazardous Waste Minimization Tips"). If possible, completely eliminate the generation of hazardous waste, and avoid having to comply with hazardous waste requirements altogether.

- If you store waste in containers, keep them in an area that has an impervious base and secondary containment to capture any leaks or spills. Use containers that are compatible with the waste you are putting in them, and store waste containers away from other wastes or raw materials with which they may be incompatible. In addition, ensure that the containers are kept closed and in good condition, and immediately replace or over-pack any damaged or leaking containers. Do not store hazardous waste within 50 feet of the facility property line, or immediately adjacent to rivers, streams, or shoreline areas.
- If you store waste in tanks, provide the tank with an impervious base and secondary containment to capture any leaks or spills (or, as an alternative, use double-walled tanks). Maintain the tanks to ensure they remain in good condition. Ensure that the fill opening for the tank is properly equipped so as to prevent spillage down the outside of the tank, and keep this opening closed at all times except when filling the tank. Be sure that the waste(s) that you place in the tank are compatible with the tank, and do not store wastes that are incompatible with one another in the same tank.
- Inspect all waste storage areas on a regular basis (e.g. weekly), looking for leaks, spills, damaged containers, and other hazardous conditions. Correct any problems as quickly as possible. Document your inspections in a written inspection log.
- If you discontinue the use of a tank or container storage area, remove all waste, thoroughly clean and decontaminate the area, and perform post-decontamination testing to confirm that no waste residues remain.
- Develop written emergency procedures to respond to leaks, spills, fires, storms, floods, etc.
- Provide training for all personnel involved in waste management. Include, at a minimum, training in proper waste handling and emergency response procedures. Retain documentation of all training that is provided.

### **Small Quantity Generators (SQGs)**

SQGs have more requirements than CESQGs, but fewer than LQGs. The requirements and best management practices for SQGs are listed below. If you would like more information on these requirements and BMPs, contact DEEP's Waste Engineering and Enforcement Division at 888-424-4193 and ask for the [Small Quantity Generator Handbook](#). Several other helpful documents which are available are also listed at the end of this section.

If you are a SQG, then you must do the following:

[RCSA Sections 22a-449(c)-102(b) and -102(c), 40 CFR 262.34(d)]

- If you have not done so already, apply for and obtain a U.S. EPA Identification Number. To do this, please use the new [RCRAInfo](#) EPA system to register your facility and submit modifications as necessary. DEEP will receive notification of requested modifications and will notify you if there are any concerns. If you have questions, please contact Julie Dutton ([Julie.dutton@ct.gov](mailto:Julie.dutton@ct.gov)) from DEEP's Waste Engineering and Enforcement Division or call DEEP's Waste Engineering and Enforcement Division at 888-424-4193.
- Be sure your waste hauler has a valid EPA Identification number and [transporter's permit](#) to haul waste in Connecticut.



- Ensure that your waste is disposed of at a [permitted hazardous waste treatment or disposal facility](#).
- Perform a hazardous waste determination on all the wastes you generate, and keep records of all test results and other information used to make these determinations for at least three years from the date that the waste was last sent off-site for disposal.
- Prepare a hazardous waste manifest for each shipment of waste off-site, and retain a copy of the manifest for each shipment. Ensure that the required Land Disposal Restriction (“LDR”) Notices accompany each manifested shipment, and retain copies of these notices on-site.
- Ensure that you do not store waste for more than 180 days.
- If you store waste in containers, mark each container with the words “Hazardous Waste,” a description of the contents, such as the chemical name, and the date of initial accumulation. Store containers in an area which has an impervious base, and secondary containment that is capable of containing the volume of the largest container stored in the area, or ten percent of the total volume of waste stored in the area (whichever is greater). Use only containers that are compatible with the waste you are putting in them, and store waste containers away from other wastes or raw materials with which they may be incompatible. In addition, ensure that containers are kept closed and in good condition, and immediately replace or over-pack any damaged or leaking containers. And, when shipping containers of hazardous waste off-site, ensure that they are properly packaged, marked and labeled in accordance with U.S. DOT shipping requirements for hazardous materials.
- If you store waste in tanks, mark each tank with the words “Hazardous Waste,” and a description of the contents, such as the chemical name. Ensure that the waste is compatible with the tank (e.g., don’t put corrosive waste in an unlined steel tank) and do not store wastes that are incompatible with one another in the same tank. Do not use uncovered tanks. Ensure that ignitable and reactive wastes that are stored in tanks are separated from sources of ignition or reaction (e.g., open flames, smoking, welding, sparks, etc.).
- If you discontinue the use of a tank or container storage area, remove all waste, thoroughly clean and decontaminate the area, and perform post-decontamination testing to confirm that no waste residues remain.
- Develop a written inspection schedule which lists the areas of the facility to be inspected and describes procedures to be followed during inspections. Perform inspections of all hazardous waste storage areas (weekly for containers, daily for tanks), looking for leaks, spills, damaged containers, and other hazardous conditions. Correct any problems as quickly as possible. Document your inspections (and any corrective actions taken to address noted problems) in a written inspection log, and keep these records for at least three years.
- Designate an emergency coordinator and post the name and telephone number of this coordinator next to the on-site telephone, along with the locations of fire extinguishers and spill control material, the fire alarm (if you have one), and the telephone number of



**Cabinet with spill response materials**

the local fire department (i.e., 911). Make arrangements with local emergency response authorities to coordinate emergency services in the event of an emergency.

- Ensure that whenever waste is being handled, personnel have access to an internal alarm or emergency communication device.
- In the event of an emergency (e.g. fire, explosion, waste spill, severe storm, flood, etc.), take appropriate steps to ensure that hazardous waste is not released into the environment. Notify local emergency response authorities (i.e., local fire and/or police departments). If a spill has occurred, report it to DEEP's Oil and Chemical Spill Response Division via its 24-hour spill reporting hotline at 860-424-3338 or toll-free at 1-866-DEP-SPIL. If there is a release of hazardous waste that could threaten human health outside your facility, you must also contact the National Response Center at 800-424-8802. Contain and properly dispose of any spilled or leaked waste (or hire a permitted spill cleanup contractor to perform this work). For more information, go to the Spill Reporting Fact Sheet.
- Train all personnel involved in hazardous waste management in proper waste handling and emergency procedures relevant to their specific job duties.
- Comply with Universal Waste requirements for any Universal Wastes that you generate. Universal Wastes are wastes that are subject to a special, reduced set of requirements in 40 CFR 273, and include batteries, recalled pesticides, mercury thermostats and switches, used electronics, fluorescent lights and other mercury-containing lamps (sodium vapor, metal halide and high intensity discharge lamps, including the blue-tinted HID headlamps). For more information on Universal Waste requirements, call DEEP at 888-424-4193 and ask for the [Universal Waste Rule fact sheet](#).
- Remember: if at any time your waste generation or storage amounts increase beyond SQG levels, you must comply with Large Quantity Generator Requirements.

### **Best Management Practices (BMPs) for SQGs:**

- Look for ways to reduce or eliminate the generation of hazardous waste (see page 106 for "Hazardous Waste Minimization Tips"). For some SQGs, eliminating even a small amount of waste generation will be enough to allow them to reduce to CESQG status.
- Do not store hazardous waste within 50 feet of the facility property line, or immediately adjacent to rivers, streams, or shoreline areas.
- If you store waste in tanks, provide the tank with an impervious base and secondary containment to capture any leaks or spills (or, as an alternative, use double-walled tanks). Ensure that the fill opening for the tank is properly equipped so as to prevent spillage down the outside of the tank.
- Develop written emergency procedures to respond to leaks, spills, fires, storms, floods, etc.
- Document the hazardous waste training that you provide to your employees.

### **Large Quantity Generators (LQGs)**

In general, LQGs must comply with all the requirements for SQGs as well as additional requirements [RCSA Section 22a-449(c)-102(b), 40 CFR 262.34(a) and (b)].

See the table that follows this page for an overview of the three generator categories. If you would like more information on any of these requirements or BMPs, contact DEEP's Waste Engineering and Enforcement Division at 888-424-4193 and ask for [information and guidance documents](#) that may apply to your operation. Several helpful documents that are available are

listed at the end of this section along with a table with waste minimization tips so you can reduce (or eliminate) the amount of hazardous waste you generate.

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### Did You Know?

You are legally responsible for your hazardous waste from the point of generation to its final disposal.

## Legal References

- Hazardous Waste Determinations: [40 CFR 262.11](#) and [RCSA Sections 22a-449\(c\)-101\(a\)\(2\)\(P\) – \(W\) and 22a-449\(c\)-101\(c\)](#) Characteristics of Hazardous Waste:
  - [40 CFR 261.21](#) (Ignitability)
  - [40 CFR 261.22](#) (Corrosivity)
  - [40 CFR 261.23](#) (Reactivity)
  - [40 CFR 261.24](#) (Toxicity)
- CESQG requirements: [40 CFR 261.5](#) and [RCSA Section 22a-449\(c\)-101\(a\)\(2\)\(P\) – \(W\) and 22a-449\(c\)-101\(c\)](#) [40 CFR Part 262—Standards Applicable To Generators Of Hazardous Waste](#)
- [40 CFR Subpart B—The Manifest](#)
- [40 CFR 262 Subpart C- Pre-Transport](#)
  - Labeling - [40 CFR 261.31](#)
  - Marking - [40 CFR 261.32](#)
  - Placarding - [40 CFR 261.33](#)
  - Accumulation requirements - [40 CFR 262.34\(a\) and \(b\) and \(d\)](#) and [RCSA Sections 22a-449\(c\)-102\(a\)\(2\)\(D\) – \(Z\), 22a-449\(c\)-102\(b\), and 22a-449\(c\)-102\(c\)](#)
- Standards For Universal Waste Management: [40 CFR 273](#) and [RCSA Section 22a-449\(c\)-113](#)
- Non-Hazardous “Connecticut-Regulated Wastes”: [CGS Section 22a-454](#)

**Table 1: Overview of Hazardous Waste Requirements Based on Generator Category**

	<b>Large Quantity Generator (LQG)</b>	<b>Small Quantity Generator (SQG)</b>	<b>Conditionally Exempt SQGs (CESQG)</b>
Hazardous Waste Generation Rate (per calendar month)	More than 2200 lbs. of hazardous waste OR more than 2.2 lbs. of acute hazardous waste.	More than 220 lbs. but less than 2200 lbs. of hazardous waste AND less than 2.2 lbs. of acute hazardous waste.	Less than 220 lbs. of hazardous waste AND Less than 2.2 lbs. of acute hazardous waste.
Maximum amount of Hazardous Waste on-site	None	2200 lbs	2200 lbs
Maximum storage time	90 days	180 days	No limit
Waste Determination Required?	Yes	Yes	Yes
Generator EPA ID Number Required?	Yes	Yes	No
Manifest required for shipment off-site?	Yes	Yes	No
Permitted transporter required?	Yes	Yes	Yes
Allowed disposal facilities	Permitted hazardous waste treatment, storage, or disposal facilities.	Permitted hazardous waste treatment, storage, or disposal facilities.	Permitted hazardous waste treatment, or disposal facilities; authorized household hazardous waste collections.
Storage requirements	Specific requirements for tank and <a href="#">container storage</a> .	See SQG section above for details.	None. However, see BMPs for CESQGs.
Emergency Procedures/Plans	Full written <a href="#">contingency plan</a> .	Emergency coordinator and post information near on-site telephone. See SQG section above for details.	None. However, see BMPs for CESQGs.
Inspection requirements	<a href="#">Written inspection schedule and log</a> .	Written inspection schedule and log. See SQG section above for details.	None. However, see BMPs for CESQGs.
Personnel training requirements	<a href="#">Written training plan and formal classroom training</a> .	Employees must be familiar with waste handling and emergency procedures. See SQG guidance for details.	None. However, see BMPs for CESQGs.
Record keeping requirements	Must retain manifests, biennial reports, waste determinations (with test results), inspection logs, and records of incidents requiring implementation of the contingency plan.	Must retain manifests, waste determinations (with test results) and inspection logs.	Records of waste determinations (with test results)
Biennial report	Yes – <a href="#">full report</a> .	No	No

## HAZARDOUS WASTE MINIMIZATION TIPS

Waste minimization means finding ways to reduce or eliminate the generation of hazardous waste. Some general ways to do this include:

- Eliminate activities that generate hazardous waste (e.g., by discontinuing certain services, or sub-contracting them out to off-site companies).
- Alter work practices and/or equipment so that you use less virgin material. Obviously, using less virgin material means generating less waste.
- Recycle or reuse materials on-site.
- Switch from hazardous products to non-hazardous ones.

Some specific waste minimization options for vehicle service facilities include:

- **Used Oil:** Keep hazardous waste and other contaminants out of your used oil so that it does not have to be handled as a hazardous waste.
- **Waste Fuel (e.g., gasoline):** Send the waste fuel that you generate for recycling (fuel blending) rather than for disposal or incineration. Waste fuels that are recycled in this way are exempt from regulation as hazardous waste.
- **Parts Washing:** Switch from a hazardous parts washing solvent (low-flash mineral spirits, chlorinated solvents) to a non-hazardous one (high-flash mineral spirits or water-based cleaners).
- **Paints/Solvents:** Use as little paint and as little solvent as possible to get the job done. Look into non-hazardous solvents for cleaning up, etc. Reuse solvents by settling out the paint solids, or recycle them in an on-site solvent recycling still.
- **Antifreeze (Engine Coolant):** Reuse or recycle antifreeze on-site.
- **Rags/Wipers:** Use only non-hazardous cleaning agents/solvents for cleanup. Send your rags to an industrial laundry instead of disposing of them.
- **Batteries (Lead-Acid and Household Types):** Send batteries for recycling rather than disposing of them. Manage batteries under reduced “Universal Waste Rule” requirements [40 CFR 273].
- **Old Virgin Products:** Expired or damaged products can be costly to dispose of. See if the manufacturer will take the material back, or if there is someone else who can legitimately use it. To avoid this, order products in appropriate amounts and try not to stock items that are hazardous. Review the Material Safety Data Sheets (MSDSs) from your supplier prior to purchase.
- **Oil Filters:** Puncture and hot drain for at least 24 hours or crush filter. Send for scrap metal recycling.

<b>DEEP Websites Shortcuts are noted</b>	<b>Description</b>
<a href="https://portal.ct.gov/DEEP/Waste-Management-and-Disposal/Hazardous-Waste/Hazardous-Waste-Home">Hazardous Waste Management Main Page – https://portal.ct.gov/DEEP/Waste-Management-and-Disposal/Hazardous-Waste/Hazardous-Waste-Home</a>	A wide variety of information for generators of hazardous waste, including guidance documents of various hazardous waste topics.
<a href="#">Hazardous Waste Compliance Assistance (COMPASS) Program</a>	Information about DEEP’s hazardous waste compliance assistance services: A toll-free number: 888-424-4193; Compliance Assistance Information; and Consultative Services.
<a href="http://www.ct.gov/deep/rcrahelp">RCRA Help! Web Page – www.ct.gov/deep/rcrahelp</a>	This is a user-friendly self-help guide to assist people that are not familiar with hazardous waste requirements.
<a href="#">Hazardous Waste Determinations/ Knowledge of Process</a>	Guidance on how to determine if a waste is hazardous.
<a href="#">Determining Hazardous Waste Generator Category</a>	Helps generators determine what set of requirements they are subject to.
<a href="#">Conditional Exempt Small Quantity Generator (CESQG) Web Page</a>	Information and links for generators of less than 220 lbs/month of hazardous waste.
<a href="#">Small Quantity Generator (SQG) Web Page</a>	Information and links for generators of between 220 lbs/month and 2200 lbs/month of hazardous waste.
<a href="#">Large Quantity Generator (LQG) Web Page</a>	Information and links for generators of greater than 2200 lbs/month of hazardous waste.
<a href="#">Hazardous Waste On-line Training</a>	Free online training course that will teach you about hazardous waste requirements. Intended for small and large quantity generators of hazardous waste (SQGs and LQGs).
<a href="#">Hazardous Waste Inspections</a>	Provides detailed information on hazardous waste inspection requirements that apply to small and large quantity generators (SQGs and LQGs).
<a href="#">Hazardous Waste Contingency Plan</a>	Describes the emergency planning and response requirements that apply to large quantity generators. Also a useful BMP resource for SQGs and CESQGs.
<a href="#">Hazardous Waste Container Management</a>	Describes container management requirements for small and large quantity generators (SQGs and LQGs)
<a href="#">Permitted Waste Transporter’s List</a>	List of companies who are permitted to haul hazardous waste in or through CT.
<a href="#">Commercial Hazardous Waste and Connecticut Regulated Waste Facilities in Connecticut</a>	List of facilities in CT that are permitted to store, treat, or dispose of commercial and industrial wastes.

<a href="#">Non-RCRA Hazardous Waste (Connecticut Regulated Waste)</a>	List of non-hazardous wastes which are subject to special requirements in CT.
<a href="#">Management of Used Oils in Connecticut</a>	Comprehensive guidance on the management of used oils and other oily wastes in CT.
<a href="#">Management of Aerosol Cans</a>	Fact sheet on the proper management and disposal of aerosol cans.
<a href="#">Universal Waste Rule</a>	Overview of special reduced hazardous waste requirements for batteries, mercury thermostats and switches, recalled pesticides, fluorescent lamps, and used electronics.
<a href="#">Water Based Paints - A Pollution Prevention Case Study</a>	Case study of an auto body shop that reduced air emissions and waste generation by switching to water based paints.
<a href="#">New Parts Cleaning System Eliminates Hazardous Waste - A Pollution Prevention Case Study</a>	Case study of efforts by the USPS to reduce hazardous waste generation at its vehicle maintenance facilities.
<a href="#">Business Recycling Assistance</a>	Resources for businesses looking to develop comprehensive recycling and waste recovery programs

**DISCLAIMER:** This guidance is a tool to help you evaluate compliance at your facility. It is not a complete list of all regulations and requirements that may apply to your business. You are responsible for knowing and complying with all updated applicable state, federal, local and tribal requirements. Please be aware that environmental laws and regulations, as well as process technology may have changed significantly since these were published. Please do not rely on them for current information, but rather to provide background information.

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