



Large Quantity Generator Consolidation Fact Sheet

At the start of 2022, the Oregon Department of Environmental Quality implemented the U.S. Environmental Protection Agency's Generator Improvements Rule, which includes a provision that provides an additional offsite disposal option for very small quantity generators. The rule allows very small quantity generators, or VSQGs, to transport and consolidate their hazardous waste at a large quantity generator, or LQG, facility under the control of the same person.



Who is affected?

This new rule can benefit a person – including individuals, companies, government entities – operating multiple facilities that generate hazardous waste. This rule can help organizations, such as universities, healthcare systems, military installations and retail stores, streamline hazardous waste management practices.

Key Benefits



Greater flexibility - Allows hazardous waste generators to consolidate waste to manage waste more cost effectively.



Less paperwork - VSQGs can ship hazardous waste to an LQG without a manifest. The VSQG must still comply with other applicable Oregon and U.S. Department of Transportation regulations.



Waste from a VSQG is managed under all regulations applicable to LQGs once received at the LQG facility.



There is no limit on the amount or types of hazardous waste an LQG can receive from a VSQG.

What changed?

Large and very small quantity generators controlled by the same person can now consolidate hazardous waste at the LQG facility without needing a Resource Conservation and Recovery Act treatment, storage and disposal facility permit.

	LQG Consolidation Requirements
Facilities must be under the control of the same person	<ul style="list-style-type: none"> Control is defined as "the power to direct policies of the generator."
VSQG container marking	<ul style="list-style-type: none"> VSQGs must mark containers of hazardous waste with the words "Hazardous Waste" and an indication of the hazards associated with the contents.
LQG requirements	<ul style="list-style-type: none"> Notify DEQ, using the Site Identification Notification Form on Your DEQ Online, of intent to consolidate at least 30 days before receiving the first shipment from the VSQG. Maintain shipping papers of waste transfer from VSQG for at least three years. Mark accumulation units with the date the hazardous waste was received from the VSQG. Manage the waste received from the VSQG under all regulations applicable to the LQG.
Failure to meet LQG consolidation requirements	<ul style="list-style-type: none"> Failure on the part of the LQG to meet a condition for the exemption would not mean that the VSQG is subject to a treatment, storage and disposal facility, or TSDF, permit.

Why was the rule changed?

EPA determined that providing the option for VSQGs to send their hazardous waste to an LQG under the control of the same person will improve the management of hazardous waste because:

- LQGs are subject to more stringent management conditions than VSQGs, such as accumulation time, labeling, training, emergency planning, and containment standards.
- Waste consolidated at LQGs must be disposed of at an RCRA-permitted or interim status hazardous waste TSDF.
- Economies of scale can reduce a company's overall waste management costs and potential financial liabilities for the hazardous waste it generates at VSQG facilities.

Where to find more information?

Complete regulations for proper management of large quantity generator consolidation of hazardous waste are in 40 CFR 262. Oregon Administrative Rules 340-100-0002 incorporates related federal rules by reference.

Have questions?

DEQ has made it easy for you to get your questions answered. To learn more and request free, non-regulatory technical assistance, please visit oregon.gov/deq/Hazards-and-Cleanup.

To submit forms visit Your DEQ Online at yourdeqonline.oregon.gov

Alternate formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.