
ENVIRONMENTAL Fact Sheet



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SQG Self-Transportation to Household Hazardous Waste Collection Events

For any New Hampshire business, the proper disposal of hazardous waste can be a significant expense. Fortunately for businesses that are small quantity generators of hazardous waste (SQGs), a municipal household hazardous waste (HHW) collection event can be an affordable, environmentally-sound disposal option. By participating in these programs, SQGs pay only to dispose or recycle their hazardous waste, and are spared the expensive pick-up, handling and transportation fees charged by hazardous waste transporters. The following provides guidance for understanding municipal HHW collection events and how SQGs can take advantage of these events. Full quantity generators can not participate in HHW collection events.

Questions a business should ask BEFORE using a municipal household hazardous waste collection event.

Is my business considered a Small Quantity Generator?

A SQG is any business that generates, in each and every calendar month:

- Less than 100 kilograms or 220 pounds of non-acute hazardous waste.
- Less than one kilogram or 2.2 pounds of an acutely hazardous waste.
- Less than 100 kilograms or 220 pounds of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill of any acutely hazardous waste.

How Does A Municipal HHW Collection Event Work?

Municipal HHW collection events allow SQGs to self-transport up to 55 gallons of their hazardous waste to the HHW collection event. Because the event uses a registered hazardous waste transporter who is already on location and set up to accept hazardous waste, the SQG can transfer their waste to the transporter. Before the event, the SQG must obtain the approval of the municipality and register with the transporter so each party knows what wastes will be transferred, and the SQG knows what its disposal costs will be. The SQG must also obtain a hazardous waste manifest for the waste that they intend to self-transport, and this manifest must accompany the waste during the self-transportation. The process for self-transporting waste to a HHW event can be more cost-effective than paying a transporter to remove wastes from the SQGs place of business.

Where else may an SQG transport their hazardous wastes?

SQGs may self-transport up to 55 gallons of their hazardous wastes to:

- A municipal HHW collection program in New Hampshire where SQG wastes are accepted. A list of HHW collection locations and dates can be found at <http://des.nh.gov/organization/commissioner/p2au/pps/hhwp/index.htm>.
- A facility authorized under the destination state's rules to handle the waste.
- Another site in New Hampshire owned and operated by the SQG (under certain circumstances and with proper notification to DES) for later disposal. Please contact DES for more information regarding this option.

What types of hazardous wastes may an SQG transport to a municipal HHW event?

Any waste normally picked up from the SQGs site by a registered hazardous waste transporter may be transported to a HHW collection event with prior permission from the municipality. These include any of the characteristic or listed wastes. For more information on how to determine if your waste is hazardous, please refer to the DES fact

sheet WMD-HW-11 “Identification of Hazardous Waste.” Wastes not normally accepted are: explosive, medical, radioactive or infectious wastes. Since SQGs have to obtain the hazardous waste transporter’s approval prior to the collection event, the SQG should check with the transporter regarding what wastes will be accepted.

What are the transportation requirements?

As the generator of the waste, the SQG is responsible for ensuring that its hazardous wastes are properly packaged, labeled and transported safely to the collection event. The US Department of Transportation (DOT) has established regulations for the transportation of hazardous waste that are required by the NH Hazardous Waste Rules, detailed in Env-Hw 507.03 and Env-Hw 601.02(b). When the SQG contacts the transporter to register for the HHW event, the hazardous waste transporter can tell the SQG how to package particular wastes. The following are some of the requirements for packing and transporting hazardous waste, but please contact your transporter or refer to the NH Hazardous Waste Rules for a full list of requirements:

- **Manifest** – SQGs are required to obtain a uniform hazardous waste manifest for the hazardous waste they transport. This manifest should be obtained from the hazardous waste transporter prior to the collection event and must accompany the hazardous waste that the SQG is self-transporting.
- **Packing** – NH Hazardous Waste Rules refer to the DOT requirements, including but not limited to:
 - The container must be sealed and in good condition.
 - The container must be compatible with the contents.
 - Incompatible wastes may not be stored in the same container.
- **Labeling** – All containers used for hazardous waste must be labeled in accordance with DOT and state requirements.

SQGs must also have a mechanism for financial responsibility of self-transportation including \$50,000 for bodily injury or death of each person in any one accident and \$50,000 for loss or damage in any one accident to the property of others.

What will it cost to participate in the HHW collection event?

SQGs pay the hazardous waste transporter directly for the handling and disposal charges based on the amount and type of wastes. The total cost and method of payment should be established when the SQG registers with the transporter prior to the event. There is usually no charge from the municipality for an SQG to participate in an HHW collection event. By self-transporting their allowable wastes to an event, SQGs also save on pickup costs that are normally charged.

What does a SQG need to do prior to participating in a municipal HHW collection event?

SQGs may use the following checklist when preparing to use a municipal HHW collection event.

- Inventory all waste and determine which are hazardous.
- Obtain an EPA ID number by contacting the DES Waste Management Division at (603) 271-2921, if the SQG does not already have one.
- Contact the municipal HHW coordinator to obtain their approval to participate.
- Pre-register with the hazardous waste transporter and schedule a drop off time for the collection event.
- Obtain a hazardous waste manifest from the transporter for the hazardous wastes to be transported.
- Prepare the wastes and manifest for transportation to the HHW collection event.

What happens after the transporter accepts my hazardous waste?

When the SQG drops off their hazardous waste, the transporter and the SQG will each sign the hazardous waste manifest. The SQG will sign in the boxes designated for the “Generator” and “Transporter 1.” The transporter at the HHW event will sign in the box designated “Transporter 2.” The transporter is required to give a copy of that manifest to the SQG to keep for their records. **It is the SQG’s responsibility to mail a photocopy of the hazardous waste manifest to DES WITHIN 5 DAYS.**

For More Information

For more information, please contact the DES Hazardous Waste Management Bureau at 1-866-HAZWAST (1-866-429-9278) or (603) 271-2942. A list of household hazardous waste collection events, vendors that recycle universal waste and used oil, copies of other fact sheets, and the Hazardous Waste Rules are available on the DES web site at www.des.nh.gov.