

Hazardous Waste Generator Requirement Summary Table

Generator Requirements and OAC reference	Generator Category		
	VSQG	SQG	LQG
Monthly Generation 3745-52-13	≤ 1 kg acute hazardous waste ≤ 100 kg hazardous waste	> 100 kg and < 1,000 kg hazardous waste	> 1 kg acute hazardous waste ≥ 1,000 kg hazardous waste
Total Accumulation On-site 3745-52-14 3745-52-16 3745-52-17	≤ 1 kg acute hazardous waste ≤ 1,000 kg hazardous waste 3745-52-14	> 1000 kg and < 6,000 kg hazardous waste 3745-52-16	> 1 kg acute hazardous waste ≥ 6,000 kg hazardous waste 3745-52-17
Hazardous Waste Determination 3745-52-11	Required through process knowledge or analysis	Required through process knowledge or analysis (documentation required)	Required through process knowledge or analysis (documentation required)
EPA ID Number and Re-Notification 3745-52-18	No applicable requirement	Required Re-notify every 4 years by September 1st beginning in 2021	Required Re-notify by March 1 st of even numbered years (can be done as part of the biennial report)
Accumulation Time 3745-52-14 3745-52-16 3745-52-17	None 3745-52-14	180 days or 270 if the TSDf is > 200 miles away (30-day extension also available) 3745-52-16	90 days (30-day extension also available) 3745-52-17
Generator Treatment 3745-52-16 3745-52-17	Permissible on-site but must follow LQG requirements	Can treat hazardous waste on-site for up to 180 days 3745-52-16	Can treat hazardous waste on-site for up to 90 days 3745-52-17
Satellite Accumulation 3745-52-15	No applicable requirement	Up to 55 gallons of non-acute or 1 quart of acutely hazardous waste at or near the point of generation	Up to 55 gallons of non-acute or 1 quart of acutely hazardous waste at or near the point of generation
Labeling and Marking of Containers and Tanks	Only applicable if sending hazardous waste to an LQG for consolidation 3745-52-14(A)(5)(h)(ii)	Mark with the words "Hazardous Waste", an indication of the hazards of the contents, and date upon which each period of accumulation or treatment begins (unless a satellite accumulation area) 3745-52-16(B)(6)	Mark with the words "Hazardous Waste", an indication of the hazards of the contents, and date upon which each period of accumulation or treatment begins (unless a satellite accumulation area) 3745-52-17(A)(5)

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Container Management 3745-52-16 3745-52-17 3745-52-255	No applicable requirement	Good condition compatible with waste maintain aisle space and lids conduct weekly inspections 3745-52-16(B)(2)(c) 3745-52-16(B)(8)(e)	Good condition compatible with waste maintain aisle space and lids subparts AA, BB and CC apply (federal requirement) conduct weekly inspections 3745-52-17(A)(1) 3745-52-255
Tank Management 3745-52-16(B)(3) 3745-66-90 to 99	No applicable requirement	Good condition compatible with waste daily inspections 3745-52-16(B)(3)	Good condition compatible with waste daily inspections subparts AA, BB and CC apply (federal requirement) secondary containment is required 3745-66-90 to 99
Hazardous Waste Consolidation 3745-52-14 3745-52-17	May send hazardous waste to a large quantity generator under the control of the same person Must follow labeling requirements 3745-52-14(A)(5)(h)	Not permissible	Notify Ohio EPA 30 days prior to receiving first shipment from VSQG, maintain shipping records for 3 years, and label containers with accumulation start dates 3745-52-17(F)
Pre-Transport Requirements 3745-52-30 to 33	Only applicable when sending hazardous waste for consolidation at a large quantity generator (see above)	Packaging Labeling Marking Placarding	Packaging Labeling Marking Placarding
Personnel Training 3745-52-16 3745-52-17	No applicable requirement	All employees must be thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities 3745-52-16(B)(9)(c)	Required with annual refresher 3745-52-17(A)(7)

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Emergency Equipment 3745-52-16 3745-52-252 3745-52-253	No applicable requirement	Internal communication or alarm system Telephone or two-way radio Fire, spill control and decontamination equipment Testing and maintenance of equipment is required 3745-52-16(B)(8)(b)&(c)	Internal communication or alarm system Telephone or two-way radio Fire, spill control and decontamination equipment Testing and maintenance of equipment is required 3745-52-252 3745-52-253
Emergency Procedures & Contingency Plan 3745-52-16 3745-52-250 to 265	No applicable requirement	Written plans are not required. Emergency Coordinator's response required 3745-52-16(B)(8)	Written contingency plan and emergency procedures required 3745-52-250 to 265
Recordkeeping 3745-52-11 3745-52-40 3745-52-16 3745-52-17	Records of waste evaluation	Manifests LDR notification Exception reports Waste evaluation (kept on-site for at least 3 years) Tank inventory logs (readily available for inspection) 3745-52-16(B)(6)(b)(iv)	Manifests LDR notification Exception reports Annual reports Waste evaluation (kept on-site for at least 3 years) Training records 3745-52-17(A)(7)(e) Tank inventory logs (readily available for inspection) 3745-52-17(A)(5)(b)(iv)
Manifesting 3745-52-20 to 23	No applicable requirement	Required	Required
Exception Reports 3745-52-42	No applicable requirement	Notify and send a copy to Ohio EPA within 60 days	Contact the transporter and/or destination facility within 35 days and send report to Ohio EPA within 45 days
Land Disposal Restriction Determination 3745-270-07	No applicable requirement	Determine if waste must be treated before it can be land disposed (or write on manifest that a determination has not been made)	Determine if waste must be treated before it can be land disposed (or write on manifest that a determination has not been made)

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Land Disposal Restriction Notification 3745-270-07	No applicable requirement	One-time written notice to each TSDf receiving your hazardous waste	One-time written notice to each TSDf receiving your hazardous waste
Biennial Reports 3745-52-41	No applicable requirement	No applicable requirement	Required by March 1 st in even numbered years for previous year

Hazardous Waste Generator Recordkeeping Requirements Table

Recordkeeping Requirements (and OAC references)	Generator Category		
	VSQG	SQG	LQG
Hazardous Waste Determination 3745-52-11(F)	No records specifically required, but must be able to show compliance with 3745-52-11	Required through process knowledge or analysis. Documentation required for at least three years.	Required through process knowledge or analysis. Documentation required for at least three years.
Manifest 3745-52-23	Records not required	Retain a signed copy for at least three years.	Retain a signed copy for at least three years.
Exception Report 3745-52-40(B)	Records not required	Record not required. Place note on manifest.	Retain a copy for at least three years from due date.
LDR Notifications, Certifications and Waste Analysis Data 3745-270-07	Records not required	Retain on-site for at least three years all notices, certifications, waste analysis data and other documentation pursuant to this rule.	Retain on-site for at least three years all notices, certifications, waste analysis data and other documentation pursuant to this rule.
Arrangements with Local Authorities 3745-52-16 3745-52-256	Records not required	Records documenting the arrangements with the local fire department and any other organization necessary to respond to an emergency 3745-52-16(B)(8)(f)(ii)	Records documenting the arrangements with the local fire department and any other organization necessary to respond to an emergency 3745-52-256(B)
Biennial Reports 3745-52-40(B)	Records not required	Records not required	Retain a copy for at least three years from due date.

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Personnel Training Documents 3745-65-16(E)	Records not required	No records specifically required, but generators must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures. 3745-52-16(B)(9)(c)	Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. 3745-52-17(A)(7)(d) 3745-52-17(A)(7)(e)
Tank Inspection Records 3745-52-16 3745-52-17 3745-66-95(G)	Records not required	Must maintain records demonstrating tanks have been emptied within 180 days 3745-52-16(B)(6)(b)(iv)	Must maintain records demonstrating tanks have been emptied within 90 days. 3745-52-17(A)(5)(b)(iv) record tank inspections in an operating log. 3745-66-95(G)

Note:

The retention period is automatically extended during the source of any unresolved enforcement action regarding the regulated activity or as requested by the director.