

## U.S. EPA Hazardous Waste Generator Improvement Rule (HWGIR) – Questions from Your Peers Answered by Our Experts

*Verisk 3E's John Koning, Regulatory Business Solutions Specialist, recently offered guidance regarding 60 changes to the Hazardous Waste Generator Improvement Rule (HWGIR). Find out potential impacts to your business in this Q&A along with our on-demand webinar:*

[Understanding the Hazardous Waste Generator Improvements Rule.](#)

**Question: Can a Very Small Quantity Generator (VSQG) consolidate to a Small Quantity Generator (SQG) or only to a Large Quantity Generator (LQG) site?**

A: No, the HWGIR only allows for a VSQG to consolidate at an LQG facility.

**Question: Do reclamation items now need to be reported?**

A: The waste that is received from a VSQG site during waste consolidation at an LQG site will need to be reported.

**Question: For a multilocation facility that has more than one VSQG facility, can they move hazardous waste from a VSQG to a central SQG facility to ship it?**

A: No, the HWGIR only allows for a VSQG to consolidate at an LQG facility.

**Question: Are you allowed one planned and one unplanned (e.g. spill) episodic event per year?**

A: Correct. After the first event (planned or unplanned), you may then apply for a second event to occur during the calendar year.

**Question: How do the waste containers need to be labeled to show hazardous waste?**

A: All containers must be labeled "Hazardous Waste" as well as labeling the hazards by using a Department of Transportation (DOT) hazard communication placard, an Occupational Safety and Health Administration (OSHA) hazard statement/pictogram or the Resource Conservation and Recovery Act (RCRA) characteristic label.

**Question: Regarding the every-four-year notification requirement for SQGs that begins in 2021, will there be a federal form for submission or a state-specific form?**

A: The requirement is determined by the form your state uses for Environmental Protection Agency Identification (EPA ID) notifications. In most cases, it will be the federal EPA Form 8700-12, unless your state uses a specific state form and/or online submittal method.

**Question: How can you keep up with waste classification changes?**

A: Verisk 3E can help. Our EHS specialists will identify and classify items from your chemical inventory that may be regulated as hazardous waste in accordance with United States Federal and State and Canadian Federal and Provincial regulations. We will review product information from the Safety Data Sheet (SDS) and determine the applicable waste code(s) for specified items.

Waste classification data can be supplied in the form of a customer report, data file or data feed directly into your corporate system. We will maintain the data by monitoring changes to hazardous waste regulations and SDSs and provide updates on an ongoing basis.

**Question: Do you have guidelines to assist in choosing waste removal vendors?**

A: Verisk 3E does not consult on which vendors to use. We do offer services to support hazardous waste management activities for your facilities located in the US and Canada. We can provide a toll free number, available 24-7-365, for your facilities to request an off schedule waste pickup.

We record the request, collect waste pickup information and provide information to your designated contact to coordinate the removal of the waste onsite.

### **Choose Verisk 3E**

At Verisk 3E, our proven team of hazardous waste specialists is qualified, prepared and ready to provide support for all aspects of HWGIR compliance. We are here to help you understand how changes to the Hazardous Waste Generator Program apply to your business and offer a range of services and solutions to streamline compliance while protecting your employees,

customers, emergency response personnel, waste handlers, site visitors and business. [Contact us today](#)