

Virginia Department of Environmental Quality
Hazardous Waste Program
Hazardous Waste “Counting”

March, 2016

Purpose

The purpose of this document is to provide compliance assistance to Virginia facilities that generate hazardous waste and how such hazardous waste should be managed to meet the requirements of the [Virginia Hazardous Waste Management Regulations](#). The information in this document does not apply to persons generating household hazardous waste as defined in 40 CFR 261.4(b)(1).

This information is provided for compliance assistance purposes only by the Virginia Department of Environmental Quality (DEQ). This is not a regulation and, therefore, does not add, eliminate, or change any existing regulatory requirements. The statements in this document are intended for informational purposes only.

Discussion

Once you know that you generated hazardous waste, you need to determine the amount of wastes generated each month. The amount generated per month determines your generator category. Many hazardous wastes are liquids and are measured in gallons -not pounds. In order to measure your liquid wastes, you will need to convert the volume to weight, from gallons to pounds. To do this you must know the density of the liquid. The density of water is approximately 8 lbs per gallon. A 55 gallon drum of liquid wastes with a density similar to water would weigh about 440 pounds. If the quantity of waste generated varies sufficiently from month to month to change the generator category, then the requirements that apply to the facility will vary from month to month as well.

When counting the hazardous waste make sure to include all hazardous waste but remember to count it once:

- Any wastes that have been accumulated on-site before treatment or disposal, or accumulated prior to recycling, including hazardous waste accumulating in satellite accumulation containers.
- Hazardous wastewater that is either accumulated or accumulated prior to entering a wastewater treatment unit or transported off-site to a wastewater treatment unit.
- Wastes that are packaged for off-site transport.
- Wastes going to RCRA regulated disposal or treatment facilities.
- Wastes treated or managed on-site (unless exempt).
- Wastes recycled on-site.

Virginia Department of Environmental Quality
Hazardous Waste Program
Hazardous Waste “Counting”

March, 2016

- Spent materials that have been removed from service even though they remain in process equipment. For example, a spent or contaminated plating solution in plating tanks.

You should not include the following waste in your waste count:

- Waste that is excluded in 40 CFR 261.2, 261.3, 261.4, 261.6, 261.7 and 261.8.
- Wastes recycled in a closed-loop system.
- Wastes generated in an active manufacturing unit prior to removal (e.g., sludge in parts washer would not be counted until the sludge was removed from the parts washer).
- Secondary materials that are used or reused without prior reclamation.
- Used oil that has not been mixed with hazardous waste, provided the used oil is recycled or burned for energy recovery.
- Spent lead-acid batteries sent off-site for reclamation.
- Waste that was already counted in the month and was recycled or treated on-site.
- Materials that have been recycled and are ready to be used without further treatment or processing.
- Residue in the bottom of empty containers.
- Scrap metal.
- Universal waste.

To avoid double counting, 40 CFR 261.5(d) states that the following types of waste need not be counted when determining generator classification. All of these wastes have already been counted when they were initially generated:

- Hazardous waste when removed from on-site storage.
- Hazardous waste produced by on-site treatment (including reclamation) as long as the hazardous waste was counted once.
- Spent materials generated, reclaimed, and subsequently reused on site, as long as the spent material is counted once during the calendar month.

Once you have determined the amount of waste you generate you will be able to determine your generator category. There are three generator categories, each of which is regulated differently. Click on the hyperlinks below for additional information on each category.

- [Large quantity generators](#) (LQGs)

**Virginia Department of Environmental Quality
Hazardous Waste Program
Hazardous Waste “Counting”**

March, 2016

- [Small quantity generators](#) (SQGs)
- [Conditionally Exempt Small Quantity Generators](#) (CESQGs).

For More Information

Please contact the appropriate [DEQ regional staff](#) if you have any questions regarding applicability of these requirements to your facility.