For operations located away from the main OSU campus, hazardous waste management can be a challenge. This guide will assist off-campus operations (farms, research stations, extension offices, etc.) in managing their hazardous waste as a Conditionally Exempt Small Quantity Generator (CESQG) where possible.

Small operations/entities can manage hazardous waste as a CESQG provided they meet certain requirements. Managing waste under the CESQG rules eliminates many of the legal and regulatory requirements. It can help reduce costs associated with hazardous waste as well.

**CESQG QUALIFICATION REQUIREMENTS**

- Generate less than 220 total pounds of hazardous waste per calendar month.
- Generate less than 2.2 pounds of acutely hazardous waste per month. Acutely hazardous materials are known as ‘P-List’ materials. [http://oregonstate.edu/ehs/sites/default/files/pdf/Plist.pdf](http://oregonstate.edu/ehs/sites/default/files/pdf/Plist.pdf)
- Have a maximum accumulation of no more than 2200 pounds of hazardous waste or 2.2 pounds of acutely hazardous waste on site at any one time.
- Identify all hazardous waste generated on site.
- Ensure delivery of all hazardous waste generated to a permitted off-site treatment, disposal, or recycle facility. (Waste disposed through OSU’s hazardous waste contractor Veolia Environmental Services meets these requirements.)
- Materials managed as Universal Waste (batteries, light bulbs, ballasts) or as material for recycling (used oil, used antifreeze) does not count toward the monthly or total limits as long as they are being properly managed.

**CESQG BENEFITS**

- No 90 day accumulation time limits. Normal hazardous waste may be accumulated up to the 2200 pound limit over any period of time. (Acutely hazardous waste should be disposed of as soon as possible since accumulation of greater than 2.2 pounds triggers a higher level of generator requirements.)
- Reduced reporting requirements, no fees from state/federal agencies based on waste generation volumes, and relaxed waste management rules.
- Waste may be disposed of through OSU’s hazardous waste contractor (preferred disposal method) on a reduced frequency (once per year is an EH&S recommended minimum frequency) or under special circumstances transported (safely according to university policy) in commercial, state, or private vehicles to point of disposal.
- Many county/city Household Hazardous Waste programs will accept CESQG waste for a fee and this option is available under special circumstances.

*Note: Disposing of waste through OSU’s hazardous waste contractor, currently Veolia Environmental Services, does require DOT containers, manifests, and an EPA ID number in order for Veolia to transport waste. The complete cost of disposing of waste through Veolia including containers is covered by EH&S and not by the OSU entity disposing of waste and EH&S will assume responsibility for obtaining EPA ID numbers.*
CESQG POTENTIAL ISSUES

- If in any one calendar month the facility generates more than the limit of hazardous waste (220 pounds) or acutely hazardous waste (2.2 pounds) or the total amount of acutely hazardous waste stored on site exceeds 2.2 pounds then the facility jumps up to a higher quantity generator category for the calendar year. This triggers reporting requirements, use of DOT certified transport/manifesting, and other issues relating to storage, labeling, etc.
- With the 220 pound/month cutoff there is minimal leeway for a spill cleanup or one-time issue/project that generates more than 220 pounds of waste. A one-time leak/spill cleanup or one-time disposal of a large quantity of waste may push the monthly total above the 220 pound cutoff.

BEST PRACTICES FOR WASTE STORAGE AND MANAGEMENT

The following list includes legal requirements as a CESQG generator, requirements under university policy for hazardous waste storage, and suggested best practices.

- Identify where any hazardous waste is being generated on site and its volumes.
- Keep records of monthly waste generation.
- Label all hazardous waste containers with the words ‘hazardous waste’ and its chemical contents.
- Store all hazardous waste in good quality, closed containers in an area that is contained and sheltered from weather so as to minimize leak/spill potential.
- Provide secondary containment for waste (trays, buckets, etc.). All waste should be stored with a second layer of containment in the event of leaks/spills. This may include the storage room itself being capable of containment or the placement of waste containers inside a tray, bucket or similar container.
- Separate incompatible wastes. Waste should be stored so as the contents of one leaking container will not be exposed to the container of an incompatible waste (acid/base, solvent/oxidizer, etc.).
- Have spill prevention/cleanup supplies on hand in the event of a spill.
- Schedule disposal of waste on a regular basis (once per year minimum) so as not to allow accumulation to exceed CESQG limits.
- Follow building and fire code storage limitations based on hazard class.

For assistance with Hazardous Waste management or CESQG compliance contact EH&S at 737-2273 or at chemical.safety@oregonstate.edu