

# Frequently Asked Hazardous Waste Reporting Questions



State of Oregon  
Department of  
Environmental  
Quality

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Section**

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*Note: This document provides general guidance to facilities in preparing the annual Hazardous Waste Reporting forms. The information is not designed to provide strict legal interpretations of the terms and requirements contained in the forms and is not legally binding. Refer to Title 40 of CFR; to ORS 466.005; to OAR 340-100; and to OAR 340-101 for precise legal wording.*

## 1. Do I need to report?

Most facilities generating and/or managing hazardous waste need to report to DEQ. All companies that have an active RCRA Site Identification number will receive information about annual reporting in late December or early January every year. The following categories have reporting requirements:

- Hazardous Waste Generators – See Frequently Asked Question # 8 to determine whether you fit into any of the three hazardous waste generator categories.
  - Small and Large Quantity Generators are required to report annually using the Site Identification (SI) Form and the Generation & Management (GM) Forms.
  - Conditionally Exempt Generators (CEGs) are only required to report if there is a change in their generator status or site information; unless they are only a generator due to remediation of environmental contamination. Sites with ongoing cleanup activities will need to report annually until the cleanup is completed and their RCRA Site ID number is withdrawn (See DEQ Hazardous Waste Policy 2000-PO-003). CEGs report using the Site Identification (SI) Form
- Hazardous Waste Treatment, Storage, or Disposal Facilities (TSDs) – This means that your facility has filed a Part A permit application or holds a Part B permit for the treatment, storage, or disposal of hazardous waste as required under the Resource Conservation and Recovery Act. TSD facilities report their waste receipts using the Hazardous Waste Received (WR) Form.
- Designated Hazardous Waste Recycling Facilities – This means that your facility receives hazardous waste from off-site and recycles this waste in units that are exempt from requirements to obtain a Resource Conservation and Recovery Act permit for the management of hazardous waste. Recycling facilities report their waste receipts using the Hazardous Waste Received (WR) Form.

## 2. What if I need an extension to the reporting deadline?

The annual report deadline submission for Small and Large Quantity Generators is March 1st of every year for reporting hazardous waste activities of the previous year. The annual report deadline submission for Conditional Exempt Generators that are reporting updated site information is April 1st of every year. Refer to question 1 for clarification on CEG reporting requirements.

Request an extension to the deadline by doing one of the following:

- Send an email to: [hazwaste@deq.state.or.us](mailto:hazwaste@deq.state.or.us).
- Send a fax to "Hazardous Waste Forms Clerk" at 503-229-6977.
- Mail a request to: DEQ., Attn. Hazardous Waste Forms Clerk, 811 SW Sixth Ave., Portland, OR 97204

In your request, please be sure to include your RCRA Site ID number. A confirmation letter will be sent to you with an extension of 30 days past your deadline. Per Oregon Administrative Rules, only one 30-day extension can be granted.

## 3. How do I report if I sold my business?

It must be decided between the old and new owner if one owner will report for the full calendar year or if each owner will report for the portion of the year they were in business. If only one owner is reporting, then follow the appropriate directions below and check the box on the Site Identification (SI) Form for "Filing for entire year" (in Section 1 "Reason for Submittal").

The following guidelines are provided to assist either owner. You can get more detailed instructions in the HazWaste.net training manual or by calling the Annual Report Hotline at 503-229-6938, or toll-free within the State of Oregon at 1-800-452-4011, extension 6938.

**Old Owner** - Fill out the SI Form checking the box "To Withdraw Site Identification Number" and "Change in business ownership (representing the old owner)". Also, provide the following information:

- Effective date of ownership change (provide in Section 1)
- New legal owner information (provide in Section 14. Comments)
- Generator status for your portion of the year (provide in Section 10)
- Generation & Management (GM) Forms if generator status was small or large quantity.

**New Owner** - The reporting forms must be filed using paper forms because a signature is required from the new owner or his/her representative. Start with a SI Form that is pre-populated with the old owner's information. There is space provided to give the new ownership information. The training manual will give directions on how to print a pre-populated SI form or call the Annual Report Hotline for assistance.

## 4. What is a hazardous waste?

Waste is defined as "hazardous" in Oregon for one of two reasons:

- A. It is defined by Title 40 of the Code of Federal Regulations (CFR), Part 261.3 as a hazardous waste. Hazardous waste is solid waste that possesses at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or that appears on official lists of hazardous wastes.

Wastes that are defined as hazardous based on one of the four characteristics are known as "characteristic" hazardous wastes; wastes that appear on official lists are known as "listed" hazardous wastes.

Standards for determining the hazardous characteristics of ignitable, corrosive, reactive, or toxic wastes can be found in 40 CFR 261.20-261.24. This 40 CFR section also describes the tests generators should conduct on their wastes to determine whether they are hazardous.

- B. It is a "state-only" waste defined as hazardous in the state of Oregon. Oregon includes six categories of waste in its definition of state-only hazardous wastes:
1. A residue containing a 3 percent or greater concentration of any substance or mixture of substances contained in 40 CFR 261.33(e), except pesticides with toxic constituents listed in 40 CFR 261.24(a) that

are below the prescribed regulatory level. These are acute hazardous wastes, with codes beginning with the letter "P".

2. A residue containing a 10 percent or greater concentration of any substance or mixture of substances contained in 40 CFR 261.33(f) except pesticides. These are EPA hazardous wastes, with codes beginning with the letter "U".
3. Spill cleanup debris containing any amount of hazardous wastes listed in 1 or 2, above.
4. Pesticide residues that are not managed as a universal waste.
5. Contaminated pesticide containers.
6. GB (Sarin) and VX nerve agents, mustard agents and demilitarization residues from the treatment, testing and storage of these agents which have been added to the list of commercial and chemical products found in 40 CFR 261.33 and 261.31, respectively.

In addition, any waste that is imported to Oregon from another state and is a state-only hazardous waste in the state of origin must be managed as it would be required to be managed in the state of origin.

A regulatory definition of state-only hazardous waste can be found in OAR 340-101-0033.

Note: There are a number of state-only wastes that are not hazardous wastes and need not be reported on the annual reporting forms (e.g., X002 - PCBs). These are listed in Frequently Asked Question #6.

## 5. What is an acute hazardous waste?

Acute hazardous waste is any hazardous waste with a waste code beginning with the letter "P", or any state-only hazardous waste with a waste code beginning with the letters "P" or "ORP", or any of the following "F" codes: F020, F021, F022, F023, F026, and F027. These wastes are subject to stringent quantity standards for accumulation and generation.

## 6. What is not a hazardous waste?

The following are not hazardous wastes and does not need to be reported as a hazardous waste.

- Polychlorinated biphenyl (PCB) wastes regulated under the Toxic Substances Control Act (see 40 CFR 761). The generation of PCB wastes should not be reported, although PCBs are subject to specific management requirements (see OAR 340-110).
- Used oil, having a minimum energy value of 5,000 BTUs per pound, that is burned for legitimate energy recovery (see OAR 340-111-0010).
- Used oil that is legitimately mixed with hazardous waste as described in 40 CFR 279.10(b).
- Spent lead-acid batteries that are reclaimed (see 40 CFR 266.80).
- Waste Pesticide that is managed as a universal waste.

The following wastes have been assigned codes but currently are not regulated as hazardous waste and should not be reported on the reporting forms.

X002 Polychlorinated biphenyls

X004 Industrial waste (non-hazardous)

X006 Lab Pack (non-hazardous)

X008 Household hazardous waste

Finally, the following wastes are excluded from the definition of solid and/or hazardous waste as listed in 40 CFR 261.4 and 261.3(c)(2)(ii) and amended in OAR 340-101-0004. The following list is intended to be a general overview and is not all-inclusive. With the exception of the Point Source Discharge Wastewater (See Frequently Asked Question #12), these exclusions

*Note: Some of these exclusions must meet very specific conditions. Refer to 40 CFR 261.4 and 261.3(c)(2)(ii) and OAR 340-101-0004 to make sure a specific waste qualifies. Also, refer to the DEQ's hazardous waste*

policies as specified. The hazardous waste rules and policies can be found on DEQ's web site at <http://www.deq.state.or.us/lq/hw/resources.htm>

**Abandoned Hazardous Waste** - Containerized hazardous wastes illegally deposited on real property. The owner or operator of the land or business did not generate or transport the hazardous waste to the real property site, and the identity of the true hazardous waste generator cannot reasonably be identified. To be exempt an Abandoned Hazardous Waste Fee Relief Form must be approved by DEQ. See DEQ Hazardous Waste Policy 1994-PO-002.

**Acid** - Potentially recyclable spent sulfuric acid that is used to produce virgin sulfuric acid. To be exempt, the acid must not be accumulated speculatively as defined in 40 CFR 261.1(c). See 40 CFR (261.4(a)(7).

**Agriculture, Irrigation** - Irrigation return flow. [See 40 CFR 261.4(a)(3).]

**Building Demolition Debris** - Debris from the demolition of buildings containing lead based paint when hazardous components such as mercury switches, lead piping, waste solvents or paints have been removed and properly disposed according to DEQ Hazardous Waste Policy 1997-PO-002A.

**Cathode Ray Tubes (CRTs)** - CRTs are not hazardous waste provided they are destined for reuse or recycling. The recycling of CRT-containing equipment refers to any legitimate recovery process including glass-to-glass recycling, reclamation, reuse of parts, and lead smelting operations. CRT glass destined for use in a manner constituting disposal (e.g., use as road base, concrete ingredient, etc.) will not be considered to be legitimately recycled. All CRT-containing equipment that is not recycled or reused remains subject to applicable hazardous waste regulations. See DEQ Hazardous Waste Policy 2002-PO-001.

**Cement Kiln Dust** - Waste from a cement kiln. Cement kilns that burn or process hazardous waste must comply with 40 CFR 266.112. See 40 CFR 261.4(b)(8).

**Chromium, Leather Tanning** - A waste which is considered hazardous because: (1) it is listed only due to the presence of chromium, or (2) it has demonstrated the characteristic of chromium on the basis of the EP toxicity or the TCLP test and is not hazardous for any other reason. See 40 CFR 261.4(b)(6).

**Circuit Boards** - Shredded circuit boards being recycled provided that they are stored in adequate containers and free of mercury and batteries. See 40 CFR 261.4(a)(14). Whole used circuit boards, containing batteries and minimum quantities of mercury, which are protectively packaged before recycling are excluded as scrap metal. See 40 CFR 261.4(a)(13).

**Coke-Oven Waste** - Listed hazardous waste codes K060, K087, K141, K142, K143, K144, K145, K147, K148 and any other waste from the coke by-products processes that are hazardous only because they exhibit a toxic characteristic as defined in 40 CFR 261.24. These wastes are not regulated when they are recycled by: (1) coke ovens, (2) the tar recovery or refining process, or (3) by mixing with coal tar. This exclusion only applies to wastes that are contained and not placed directly on the land. See 40 CFR 261.4(a)(10).

**Comparable Fuels/Syngas** - Comparable fuels or comparable syngas fuels (i.e., comparable/syngas fuels) that meet the requirements of 40 CFR 261.38. See 40 CFR 261.4(a)(16).

**Condensates** - Condensates derived from the overhead gases from kraft mill steam strippers that are used to comply with 40 CFR 63.446(e). The exemption applies only to combustion at the mill generating the condensates. See 40 CFR 261.4(a)(15).

**Diesel Fuel and Asphalt Tack/Emulsion Waste Mixtures** - Waste consisting of diesel fuel used to clean equipment used for applying asphalt tack/emulsion, managed and recycled according to DEQ Hazardous Waste Policy 1999-PO-001. Diesel fuel and asphalt tack/emulsion waste mixtures managed and recycled according to the policy will be assumed to be non-hazardous waste.

**Drilling Fluids** - A drilling fluid, produced water, or other waste associated with the exploration for or the development or production of crude oil, natural gas, or geothermal energy. See 40 CFR 261.4(b)(5).

**Emission Control Wastes** - Fly ash waste, bottom ash waste, slag waste, or flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels, except as provided in 40 CFR 266.112. See 40 CFR 261.4(b)(4).

**Fertilizer** - Solid wastes generated from growing and harvesting of agriculture crops or raising of animals (including production of manure), where the waste is returned to the soil as a fertilizer. See 40 CFR 261.4(b)(2).

**Hazardous Waste Inside Units** - Hazardous waste that is generated inside a product or raw material storage tank, transport vehicle, pipeline, in a manufacturing process unit or an associated non-waste treatment unit is not subject to regulation until it exits the unit in which it was generated; unless, the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw material. See 40 CFR 261.4(c).

**Household** - Household waste, including household waste that has been collected, transported, stored, treated, disposed, recovered (e.g., refuse-derived fuel), or reused. "Household waste" means any waste material (including garbage, trash, and sanitary wastes in septic tanks) derived from households (including single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds, and day-use recreation areas). See 40 CFR 261.4(b)(1).

Note: A resource-recovery facility managing municipal solid waste shall not be deemed to be treating, storing, disposing of, or otherwise managing hazardous wastes for the purposes of regulation under the Resource Conservation and Recovery Act (RCRA) if that facility: (1) receives and burns only household wastes (from single and multiple dwellings, hotels, motels, and other residential sources) and commercial or industrial solid waste that does not contain hazardous waste; and (2) does not accept hazardous wastes and the owner or operator of the facility has established contractual requirements or other appropriate notification or inspection procedures to assure that hazardous wastes are neither received nor burned in the facility.

**Leachate** - Leachate or gas condensate collected from landfills where certain solid wastes have been disposed are excluded, provided that the requirements outline in 40 CFR 261.4(b)(15) are met. Specifically, the solid wastes had to have been disposed of prior to the effective date of the new listing for K169-K172 (February 8, 2001), and would have otherwise met one or more of the listing descriptions if these wastes had been generated after the effective date of the listing. In addition, in order to remain exempt from regulation, the leachate or gas condensate derived from these previously disposed wastes must not be hazardous for any other reason, must be discharged under 307(b) or 402 of the Clean Water Act, and must not be managed in surface impoundments. See 40 CFR 261.4(b)(15)

**Mining, In situ** - Material subjected to in situ mining techniques in which the material is not removed as part of the extraction process. See 40 CFR 261.4(a)(5).

**Mining Overburden** - Mining overburden returned to the mine site. See 40 CFR 261.4(b)(3).

**Mining Waste** - Solid waste from the extraction and beneficiation of ores and minerals (including coal, phosphate rock, and overburden from the mining of uranium ore). (Mineral "processing waste" may be regulated as hazardous waste). Mining facilities that burn or process hazardous waste must comply with 40 CFR 266.112. See 40 CFR 261.4(b)(7) and amendment of OAR 340-101-0004.

**Non-Terne Plated Used Oil Filters** - These filters are not hazardous waste if they are hot-drained and not mixed with any other hazardous waste. See 40 CFR 261.4(b)(13).

**Nuclear** - Byproduct, source, or special nuclear material as defined by the Atomic Energy Act of 1954, as amended 42 U.S.C. 2011 et seq. from the Atomic Energy Act, these terms are defined as follows:

"Byproduct material" means: (1) any radioactive material (except special nuclear material) yielded in or made radioactive by exposure to the radiation incident to the process of producing or utilizing special nuclear material; and (2) the tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material content.

"Source material" means: (1) uranium, thorium, or any other material which is determined by the Commission pursuant to the provisions of Section 2091 of this title to be source material; or (2) ores containing one or more of the foregoing materials in such concentration as the Commission may by regulation determine from time to time.

"Special nuclear material" means: (1) plutonium, uranium enriched in the isotope 233 or in the isotope 235, and any other material which the Commission, pursuant to the provisions of Section 2071 of this title, determines to be special nuclear material, but does not include source material; or (2) any material artificially enriched by any of the foregoing, but does not include source material.

If the excluded material described above is mixed with a hazardous waste, or otherwise meets the definition of hazardous waste, the material mixed wastes should be reported on the forms. See 40 CFR 261.4(a)(4).

**Petrochemical Recovered Oil** - Petrochemical recovered oil is oil that has been reclaimed from an associated organic chemical manufacturing facility where the oil is to be inserted into the petroleum refining process along with normal petroleum refinery process streams provided that the requirements of 40 CFR 261.4(a)(18) are met.

**Petroleum Contaminated Media** - Soil, groundwater or debris generated from an underground storage tank cleanup that is contaminated with petroleum and carries hazardous waste codes D018 through D043 only. See 40 CFR 261.4(b)(10).

**Petroleum Refining Spent Caustics** - Spent caustic solutions from petroleum refining liquid treating processes used as a feedstock to produce cresylic or naphthenic acid are excluded, provided the materials are not placed on the land or accumulated speculatively as defined in Section 261.1(c). See 40 CFR 261.4(a)(19).

**Pulping Liquor** - Potentially recyclable pulping liquor (black liquor) reclaimed in a pulping liquor recovery furnace so long as the material is reused in the pulping process and is not accumulated speculatively, as defined in 40 CFR 261.1(c). See 40 CFR 261.4(a)(6).

**Recovered Oil** - Oil that has been recovered from secondary materials, and was generated due to normal petroleum refining, exploration, production and transportation practices is not a hazardous waste if it is to be inserted into the petroleum refining process. See 40 CFR 261.4(a)(12).

**Samples** - Samples of solid waste or contaminated media that are used to determine if a waste is hazardous, are not hazardous wastes, providing the requirements found in 40 CFR 261.4(d) are followed.

**Scrap Metal** - Processed scrap metal, unprocessed home scrap metal, and unprocessed prompt scrap metal being recycled. See 40 CFR 261.4(a)(13).

**Secondary Materials** - Secondary materials that are reclaimed and returned to the original process or processes in which they were generated where they are reused in the production process provided a "closed-loop recycling system" is used. The definition of a closed-loop recycling system is on page 13. See 40 CFR 261.4(a)(8).

**Secondary Materials from Mineral Processing** - This exclusion applies to secondary materials (e.g., sludges, by-products, and spent materials as defined in 40 CFR 261.1) generated within the primary mineral processing industry from which minerals, acids, cyanide, water, or other values are recovered by mineral processing, provided that: the secondary material is legitimately recycled to recover minerals, acids, cyanide, water, or other values; and certain other conditions specified in 40 CFR 261.4(a)(17) are met. See 40 CFR 261.4(a)(17).

**Sewage, Domestic** - Any untreated sanitary wastes that pass through a sewer system. This exclusion does not include dry cleaning wastewater. See 40 CFR 261.4(a)(1)(i).

**Sewage, Mixture** - Any mixture of domestic sewage and other wastes that passes through a sewer system to a Publicly Owned Treatment Works (POTW). This exclusion does not include dry cleaning wastewater. See 40 CFR 261.4(a)(1)(ii).

**Spent Wood Preserving Solutions** - These wastes are excluded provided they are reused on site at water borne plants in the production process for their original intended purpose and are managed to prevent release into the environment per the conditions specified in 40 CFR 261.4(a)(9).

**Splash Condenser Dross Residue** - Non-wastewater splash condenser dross residue from the treatment of K061 hazardous waste in high temperature metals recovery units, providing the waste is shipped in drums, and not land disposed prior to recovery. See 40 CFR 261.4(a)(11).

**Treatability Study Samples** - Samples that are collected for determining if a waste is suitable for a particular treatment method are not hazardous waste providing the requirements of 40 CFR 261.4 (e) & (f) are followed.

**Used Antifreeze** - Antifreeze generated from motor vehicles, motorized equipment, industrial/commercial processes and deicing activities that is managed and recycled according to DEQ's Hazardous Waste Policy # 1997-PO-004. Used antifreeze that is managed and recycled according to the policy will be considered to be non-hazardous.

**Used Chlorofluorocarbons** - Used chlorofluorocarbon refrigerants from totally enclosed heat transfer equipment such as mobile air conditioning systems, mobile refrigeration, and commercial and industrial air conditioning and refrigeration processes are not hazardous waste if reclaimed for further use. See 40 CFR 261.4(b)(12).

**Used Oil Re-refining Still Bottoms For Asphalt Production** - Still bottoms from used oil re-refining processes that are used as feedstock for the production of asphalt. See 40 CFR 261.4(b)(14).

**Wastewater, Point Source Discharge** - Industrial wastewater discharges that are point source discharges subject to regulation under Section 402 of the Clean Water Act, as amended. This exclusion applies only to the actual point source discharge. It does not exclude industrial wastewaters while they are being collected, stored, or treated before discharge, nor does it exclude sludges that are generated by industrial wastewater treatment. See 40 CFR 261.4(a)(2).

**Wood, Wood Products** - A solid waste consisting of discarded wood or wood products which fails the TCLP test solely for arsenic (but is not considered hazardous for any other reason) and is generated by persons who utilize the arsenical-treated wood and wood products for these materials' intended end uses. See 40 CFR 261.4(b) (9).

## 7. Which hazardous wastes do I report on the annual report?

### Do report waste if:

- It is managed on-site in an "open-loop" system and is accumulated or stored prior to recycling or treatment.
- It is spent material (e.g., spent solvent) that is accumulated or stored prior to being recycled on-site. See Frequently Asked Question # 11 for more details.
- It is disposed of or treated on-site.
- It is sent off-site for treatment, storage, disposal, or recycling.
- It is a residue or sludge from a "closed-loop" recycling system (on-site only).
- It is a residue or sludge from an in-line continuous recycling system (on-site only).
- It is a pesticide residue that is not reused.
- It is managed in a wastewater treatment unit or elementary neutralization unit. See Frequently Asked Question # 12 for more details.
- It is waste imported from a foreign country.

### Do not report waste if:

- It is managed on-site in a "closed-loop" recycling system.
- It is managed on-site in an "in-line" continuous recycling system.
- It is spent material (e.g., spent solvent) that is immediately transferred from a process unit to an on-site recycling unit. See Frequently Asked Question # 11 for more details.
- It is reused as is, for a purpose in which it was intended.
- It is managed as a universal waste.

## 8. How do I determine my generator status?

Hazardous waste generators are regulated differently, depending on how much waste they generate or accumulate in each calendar month. There are three types of hazardous waste generators, each with different regulatory requirements.

**Large Quantity Generator** - You are a large quantity generator, if in **any one calendar month**, you:

- Generate 2,200 or more pounds of hazardous waste, or
- Generate 2,200 or more pounds of spill cleanup debris containing hazardous waste, or
- Generate more than 2.2 pounds of acute hazardous waste, or
- Generate more than 220 pounds of spill cleanup debris containing an acute hazardous waste, or
- Have on-site more than 2.2 pounds of acute hazardous wastes.

**Small Quantity Generator** - You are a small quantity generator, if in **any one calendar month**, you:

- Generate more than 220 pounds but less than 2,200 pounds of hazardous wastes, or

- Generate more than 220 pounds but less than 2,200 pounds of spill cleanup debris containing hazardous wastes, or
- Have on-site more than 2,200 pounds hazardous waste.

**Conditionally Exempt Small Quantity Generator** - You are a conditionally exempt small quantity generator, if in every calendar month, you:

- Generate 2.2 pounds or less of acute hazardous wastes, or
- Generate 220 pounds or less of hazardous wastes, or
- Generate 220 pounds or less of spill cleanup debris containing hazardous wastes, or
- Never had on-site more than 2,200 pounds of hazardous wastes.

Your actual generator status may change from month to month. However, for purposes of reporting, your classification is based on the greatest status by which you were regulated in any one month of the calendar year. Thus, if you were an LQG for only one calendar month of the year, you must report as an LQG on these forms. You will report all of the waste generated for the entire year.

## 9. How do I identify individual waste streams?

Use your best judgment in identifying individual waste streams at your facility. Use the following guidelines:

- A waste stream has only one **source** code. Print out the Source Code Group list from the home page of HazWaste.net at <http://www.deq.state.or.us/lq/pubs/docs/hw/Reporting/SourceCodes.pdf>. This list will group the source codes by the most common waste origins. Use your best judgment in determining the source code based on the type of process or activity from which a waste was generated.
- A waste stream has only one **form** code. Print out the Form Code Group list from the home page of HazWaste.net at <http://www.deq.state.or.us/lq/pubs/docs/hw/Reporting/FormCodes.pdf>. Use your best judgment in determining the form code based on the general physical and chemical characteristics of a hazardous waste.

Example: A liquid hazardous waste stream includes spent paint thinner and paint. The waste was generated by using the thinner to clean out paint guns. W209 is the form code for "Organic paint, ink, lacquer or varnish." W211 is the form code for "paint thinner or petroleum distillates." Code W211 should be used since the thinner is the material that is spent and being discarded. The paint is merely contained within the spent thinner.

- A single waste stream may have several **waste codes**. List all codes that apply.  
Example: An electroplating shop generates wastewater treatment sludge on a monthly basis. While F006 is the code for "Wastewater treatment sludges from electroplating operations," the waste is also characteristic for corrosivity (D002) and chromium (D007). All three waste codes should be listed on the report form.
- If you generate a hazardous waste, manage it on-site, and then generate a hazardous residual from this management, you generate two separate waste streams (the original hazardous waste and the hazardous residual) and you must complete two Hazardous Waste Generation and Management (GM) Forms.

## 10. How do I report wastes with multiple management methods?

Many hazardous waste streams receive several types of management prior to final disposal. In most cases, only the **final** activity should be reported on the Waste Generation and Management (GM) Form. The only exception is wastewater accumulated on-site prior to being managed in a wastewater treatment unit (See Frequently Asked Question # 12).

If the residual from an on-site management activity is a hazardous waste, it should be reported as a separate waste stream on a separate GM Form.

**Example:** pent solvent is recycled on-site in a distillation unit, leaving a still bottom. The still bottom is then sent off-site for incineration. On one GM Form report the solvent as being managed on-site with a management code

of H020, "Solvent Recovery". On another GM Form, report the still bottoms as being managed off-site using the management code H040, "Incineration".

### 11. How do I report wastes managed in on-site distillation units?

Spent material (e.g., used solvent) that is immediately transferred from a process unit to an on-site recycling unit is not required to be counted or included in the monthly waste accumulation generator category determination, if no storage or accumulation of the spent material has occurred prior to the recycling. See DEQ's Hazardous Waste Policy 2001-PO-006 for more information on counting recycled hazardous waste.

Solvent waste such as paint thinners is often recycled on-site in distillation units, also known as stills. Waste that is managed in these units must be counted if accumulated or stored prior to recycling for purposes of determining your generator status, and reported on the Waste Generation and Management (GM) Forms.

For solvent that is accumulated or stored prior to recycling, use the following guidelines for counting and reporting of this waste stream:

Spent materials are counted only once during the month the material becomes spent; no matter how many times the solvent was reused during that month. All still bottoms removed and makeup solvents added for use are also counted during the calendar month. The monthly waste total for the waste processed through the recycling unit will be the total pounds of these three waste streams:

**Total monthly waste = first batch (or maximum capacity of the recycling unit) + still bottoms + makeup solvent**

**Example:** An on-site still recycles 10 gallons of paint thinner at a time. The facility operator runs a batch through the still four times in a month. Throughout the month, two gallons of solvent are lost in the distillation process, and fresh solvent must be added. Each run through the still generates one gallon of still bottoms. Once a month, four gallons of still bottoms are removed.

From this example, two waste streams must be counted and reported as follows:

1. The first stream is the used and make-up paint thinner. Ten gallons (the volume of the first run) plus two gallons (the amount of make-up solvent added) adds up to 12 gallons of waste paint thinner. This waste is counted towards the generator status and reported on a Waste Generation and Management (GM) Form.
2. The second waste stream is the still bottoms. Four gallons of still bottoms were removed for the month and are counted towards the generator status. The still bottoms are reported using a separate GM Form.

### 12. How do I report waste managed in wastewater treatment units or elementary neutralization units?

Wastewater that is treated in units that release to a publicly owned treatment works sewer (POTW) or to surface water under an NPDES permit may be exempt from some hazardous waste requirements. If wastewater is transferred immediately (i.e., through an engineered conveyance device) from the system which generated it into a wastewater treatment unit, the waste is not counted toward generator status. However, these wastes must be reported on the Waste Generation and Management (GM) Form using the management code H136 "Direct discharge to sewer/POTW".

Wastewater that is hazardous only because it exhibits the corrosivity characteristic and is transferred immediately (i.e., through an engineered conveyance device) into an elementary neutralization unit is not counted toward generator status. However, these wastes must be reported on the Waste Generation and Management (GM) Form using the management code H121 "Neutralization only."

Wastewater that is stored or accumulated at the facility without immediate introduction through an engineered conveyance device prior to entering a defined WWTU or ENU, must be counted for purposes of determining generator status and reported on the Waste Generation and Management (GM) Form using the code H135 "Discharge to sewer/POTW or NPDES with prior storage." For more information, see DEQ Hazardous Waste Policy 1997-PO-003 "Requirements for Owners or Operators of Wastewater Treatment Units."

**Example:** An electroplating operation generates chromium-contaminated wastewater that is collected in 55-gallon drums and stored for no more than 90 days. The waste is then transferred into an on-site wastewater treatment unit where the chromium is precipitated out, and the water is discharged to a POTW. Since the wastewater does not immediately enter the wastewater treatment unit, it must be counted toward generator status and reported on the Waste Generation and Management (GM) Form. Use the management code as H135, "Discharge to sewer with prior accumulation or storage."

**Note:** Any hazardous sludges or residuals that are removed from a wastewater treatment unit must be counted toward determining generator status and must be reported on the annual report. Use an additional Waste Generation and Management (GM) Form.

Hazardous wastewater that is transported by a vessel to an offsite wastewater treatment unit should be reported using the management code that best describes the treatment process.

Example: Chromium contaminated wastewater is pumped into a tanker truck and transported to a treatment, storage and disposal facility where the chromium is precipitated out. The waste is then released into a river under an NPDES permit. Report the total amount of waste shipped as being managed off-site with the code H077, "Chemical precipitation."

### **13. How do I report periodic or one-time waste generation?**

Periodic or one-time waste generation means the generation of waste from non-routine events, such as cleanup of spills or discarding of out-of-date products or chemicals. This includes remediation-derived waste generation, such as generation as a result of a Superfund or state remedial action or RCRA closure of a hazardous waste management unit. The generation of these wastes, including investigation derived waste must be reported on the Waste Generation and Management (GM) Forms.

### **14. How do I report satellite accumulation waste?**

Waste generated in satellite accumulation areas is required to be reported on the Waste Generation & Management (GM) Form, regardless if the waste was shipped off-site in the reporting year. If waste accumulated in satellite accumulation areas, track how much waste is generated by recording the amounts placed in the satellite accumulation drums. The total amount generated will be the sum of these recorded amounts for the calendar year.

### **15. Where do I get additional help?**

For information on hazardous waste management, technical resources, laws, regulations, policies and factsheets visit DEQ's web site at [www.deq.state.or.us/lq/hw/index.htm](http://www.deq.state.or.us/lq/hw/index.htm)

For questions about the RCRA Site ID number or the annual hazardous waste reporting, please call the DEQ Annual Report Hot Line in Portland at **(503) 229-6938** or toll free within Oregon at **(800) 452-4011**, extension 6938.

For questions regarding hazardous waste regulations, please call the small business technical assistance staff in the DEQ regional office nearest you:

**Portland:** 2020 SW Fourth Avenue, Ste 400, Portland, OR 97201 – Phone: **(503) 229-5263**

**Medford:** 221 Stewart Avenue, Ste 201, Medford, OR 97501 – Phone: **(541) 776-6010**

**Salem:** 750 Front Street, NE, Suite. 120, Salem, OR 97310 – Phone: **(503) 378-8240**

**Bend:** 2146 NE 4<sup>th</sup> Street, Ste 104, Bend, OR 97701 – Phone: **(541) 388-6146**