



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 Very Small Quantity Generator (VSQG) where possible.

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

VSQG 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. P-List materials can be found [here](#).
- 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.
- Materials managed as Universal Waste (batteries, light bulbs, ballasts) or as material for recycling (used oil, used antifreeze) do not count toward the monthly or total limits as long as they are being properly managed.
- Ensure delivery of all hazardous waste generated to a permitted off-site treatment, disposal, or recycling facility. (Waste disposed of through OSU's EH&S hazardous waste program meets these requirements.)
- Identify all hazardous waste generated on-site.

VSQG BENEFITS

- No 90-day accumulation time limits. 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 the 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.
- Waste must be disposed of through OSU's EH&S hazardous waste program on a reduced frequency (once per year minimum frequency) or under special circumstances transported (safely according to university policy) in commercial, state, or private vehicles to point of disposal.

VSQG 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.

BEST PRACTICES FOR WASTE STORAGE AND MANAGEMENT

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

- Identify locations 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 their chemical contents.
- Store all hazardous waste in good quality, closed containers in an area that is contained and sheltered from the weather 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.
- Have spill prevention/cleanup supplies on hand in case of a spill. Schedule disposal of waste regularly (once per year minimum) so as not to allow accumulation to exceed VSQG limits.
- Follow building and fire code storage limitations based on hazard class.
- 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.).

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