

**Reducing the Grey Area between Household Hazardous Waste (HHW) and Small Quantity Generators (SQGs)**

September 19, 2019

**OVERVIEW OF LAKES REGION HHW COLLECTIONS**

- LRPC has explored different options and contracts in the past – has influenced the way our collections are run
- Communities pay a certain amount (ahead of time) based on population and housing
- Residents and tax payers can bring up to 10 gallons or 50 pounds per household
- Collections bring between 60,000-80,000 pounds of HHW every year – serving about 2,000 households

**NHDES PRESENTATION – DEAN ROBINSON & CHRISTIE FARO (WASTE MANAGEMENT DIVISION)**

*STATE REGULATION DEFINITIONS:*

**Household** [Env-Hw 103.66] means a location in which humans reside on a permanent or temporary basis, including but not limited to single- and multi-family residences, bunkhouses and other crew quarters, ranger stations, motels and hotels, campgrounds, picnic grounds, and day-use recreation areas.

**Household hazardous waste (HHW)** [Env-Hw 103.66] means household waste that would be hazardous waste if generated anywhere other than in a household.

**Small quantity generator (SQG)** [Env-Hw 104.45] means any generator of hazardous waste who meets the criteria of [Env-Hw 503.01](#).

[\[Env-Hw 503.01\]](#) Small Quantity Generators. A small quantity generator shall be a generator who, in each and every calendar month, generates less than:

- (a) One hundred kilograms or 220 pounds of hazardous waste;
- (b) One kilogram or 2.2 pounds of an acutely hazardous waste; and
- (c) One hundred kilograms or 220 pounds of any residue or contaminated soil, waste, or other debris resulting from the cleanup of a spill of any acutely hazardous waste.

*CATALOG OF ENTITIES:*

- **Schools (public, private, regional) – SQGs**
  - some house students but the dormitories are separate from the school's learning center.
  - DES allows schools to do chemical cleanouts. Needs proper documentation (an itemized manifest) to bring to HHW through self-transport. SQG waste should not be mixed with HHW.
  - Charge? Same price as LRHHPF contract. Charged by how it's packed. LRHHPF contacts waste hauler to determine price. Brings check for waste hauler when they drop off materials
- **Campgrounds – HHW** even if the waste was abandoned
- **Summer Camps – HHW** per the definition
  - However, specialized programs (i.e – photo development sessions) need SQG manifests
- **Hospitals/clinics – SQGs** because waste is not typical household waste
- **Mountain huts & rangers – HHW** per the definition
  - Question: What about when they do large maintenance projects like constructing a new hut or painting an old building – maintenance on housing units is HHW, signs painted on trails are not
- **Landlords & Property Management Companies – HHW**, but we can set a limit for property management companies and make them pay based on how many doors they have
  - LRPC charges towns by households, does once household encompass an entire apartment building? Charge could be based on housing units to capture apartment buildings

- **Stores (grocery, hardware, etc.)** – SQGs because waste is not the same as what’s generated in a household
- **Painters** –
  - HHW IF leftover paint from a job is left at the house and then brought to an HHW collection
  - Continue to enforce collection limit if a large quantity is brought in
  - Businesses that transport leftover paint and store it are SQGs
  - Solvents cannot be reused
- **Landscapers** –
  - Typically generate used oil/gasoline which is considered universal waste. If waste is not contaminated and will be recycled (fuel-blended) it does not need a manifest
  - Most pesticides are considered universal waste – considered HHW at LR collections
  - LR collections: universal wastes are pulled off separately – bulbs, batteries, motor oil (used in waste oil burner) and antifreeze (not recycled), mercury-containing devices are taken by a separate vendor
- **Farms** – HHW or SQG depending on size and waste type – acceptance determined by the event host/vendor
  - Personal farm stand or small family business are HHW
    - Any other operations other than growing produce is SQG (i.e – pesticide use on several fields)
    - i.e – Moulton Farm
  - New owners own any leftover waste – case example of family finding DDT on bought property
  - Need to provide safe disposal – homeowners not likely to pay thousands for disposal
- **Marinas** – SQGs
  - If oil is known to be recycled, can accept but should probably go on a manifest, may not need an ID# - if no use for it,
  - Incinerated to burn (for disposal) vs. if burned to power a kiln (reuse) may not need a manifest
  - Third party vendor does fuel tests
- **Private boat owners** – HHW
  - Still HHW if boat is stored at a marina and owner brings/takes out their own materials for boat maintenance
- **Hotels/Motels** – HHW because of “housing” definition
  - Collections can set limits because they are businesses, even if the waste type is like HHW

### *DIRECTING SQGs*

#### **Manifests vs. Billing of Lading**

- Manifest – required for small businesses and schools
  - Need to get an EPA ID# - temporary IDs can be issued to bring waste to HHW event
- Bill of Lading – required from businesses for oil and universal wastes
  - Not an official form, filled out by transporter.
  - DIY oil is accepted without a bill of lading
  - Used oil from a business needs to go to a marketer – towns are not marketer

#### **Who do the SQGs need to contact?**

- Direct to LRHHPF
- Call NHDES – set up an EPA ID#
- Call HHW vendor to build a manifest and determine disposal price – communities don’t pay
- Prepare a handout to lead businesses to next steps if you turn them away
  - Highlight disposal options across the state
  - Include DES contact info

## DISCUSSION/QUESTIONS

### Overview of Nashua's HHW program (Mason Twombly):

- 6 collections throughout the year – 5 in Nashua, 1 alternate between Pelham and Milford every other year
- In 2019, 1,700 people participated for the region. Dropped one event last year, was closer to 1,800/1,900 a year.
  - HHW facility stores partially filled drums – once filled, transporter picks up. Does not take e-waste or pharmaceuticals
- Businesses can only drop off waste when the transporter is there
- Funding from DES and community dues
  - Dues: 25% is a flat fee per event, remaining is divided by town population
  - User fees: no more than 7-8% of budget. Usually \$10/car for up to 10 gallons. Charged per gallon for anything over the limit – \$5 intervals for every 5 gallons – cash or check only.
  - Town dues increased 10% last year
  - Setup and disposal \$25,000

### LRPC grant scope includes piloting an SQG disposal event

- Focus: Agricultural waste? Fuel cleanout event? Trash haulers?
- Not all participants would be SQGs but generate large amounts of HHW
- May be early summer or spring to reduce # showing up at HHW
- LRHHPF has more fuel come in the Spring
- Educational push with marinas and issues with oil/gasoline (not considered HHW in NH)
- SQGs can bring waste to HHW event
  - Save average of \$300 for facility to bring waste to the transporters truck
  - Some SQGs try to avoid having employees travel with hazardous waste and want to have transporter come to their facility
  - LRPC will research group rates to pick-up from a series of SQGs – may reduce costs

### Fire extinguishers? - NRRRA has a propane program, might be able to accept extinguishers

- Where do they go? – New extinguishers may have takeback program listed on label
- Some TS fire of the remaining foam and cut open the canisters for scrap metal
- Foam contains harmful PFAS chemicals
- **Topic needs to be researched**

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- Can the LRPC say “no” to state rules? **\*Dean will get back to us on this topic\***
    - We can say “no” to accepting a TYPE of waste (i.e. – LR collections don't take fireworks)
  - Universal waste – goes to transfer station without a manifest but schools/SQGs need bill of lading for tracking – transfer station has discretion to accept different amounts and charge
  - Find a way to charge hotels, motels and property maintenance companies to not cost the taxpayer and hold businesses accountable
    - Set limits: Take established 10 gallons, but require remaining waste to be manifested as a SQG - not risking our program
  - Scenario: if person says they're a business, host is not allowed to take it. If they claim they're not a business, but truly are, take some waste but leave most

- Scenario: waste cleaning/collection business puts out a flyer to pick up waste (charge or not) and store it in a shed
  - Storing waste requires an ID# as an SQG, even if it's a volunteer storing it on personal property. Municipalities are not allowed to store waste either.
  - If waste is brought directly to the HHW collection, then it can be accepted.
- Scenario: People in business vehicles claiming waste is HHW
  - Note their responsibility: say, "you realize if you drop this off without a manifest, and your business gets inspected, you're going to get a fine if it's actually commercial waste"
- Use assertion of waste statement and record what was brought in – include a statement that says "NHDES may review this report" – host can send to DES for investigating
- Disproportionate loads
  - No rules that limit drop offs or households
  - Host's choice to accept waste above/below the collection limit to offset other drop-offs
- Goffstown accepts waste from out-of-town for a fee
  - Has a full HHW facility with trained people and storage
  - Arrange appointment
  - \$2/pound – and they need to know exactly what is being brought in