

Booth 603



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# Large Quantity Generator

Michigan Safety  
Conference 2025

Laurel Flythe, CSP

[lcflythe@southchannelec.com](mailto:lcflythe@southchannelec.com)

888-747-8026

# Agenda

- 1 Am I a large quantity generator?
- 2 Oh no, I am. Now what?
- 3 Ok, That's not so bad.
- 4 What should I look out for?
- 5 If I need help...



# Am I a Large Quantity Generator?

- Survey your facility and identify types and amounts of:

Waste Type	Counts towards LQG Status
Hazardous Wastes	Yes
Liquid Industrial By Product (Michigan)	No
Solid Waste	Maybe*
Recycled Materials	No
Other Wastes	Maybe*

- Check all areas of the facility – production/process areas, office, maintenance, obsolete processes, labs, exterior
- Confirm the waste is classified appropriately

\* Ensure these are non-hazardous wastes



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## **Am I a Large Quantity Generator of Hazardous Waste?**

Don't forget to include

- Demolition waste
- Paint filters
- Activated carbon media
- Wastewater sludges/filter cakes
- Electronics
- Thermostats, thermometers
- Expired raw materials
- Expired products that can't be sold



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# Am I a Large Quantity Generator?

Materials defined as recyclable are excluded from the waste regulations as long as you follow basic procedures such as not speculatively accumulating them.

- In Michigan these include:
  - Glass
  - Paper
  - Plastic
  - Metal
  - Untreated and Uncoated Wood
  - Textiles
  - Yard Clippings
  - Other items specifically approved by EGLE





# Am I a Large Quantity Generator?

## Liquid Industrial Byproducts:

- Discarded by non-households
- Fail the paint filter liquids test
- Are not exempted or excluded
- Are not regulated as hazardous waste or medical waste



## Examples:

- Storm sewer clean out wastewater
- Some off-spec commercial products
- Some unused liquid products



# Am I a Large Quantity Generator?

Non-Hazardous Solid Wastes are excluded from your Hazardous Waste Totals.

- Examples include:
  - Non-recyclable office paper
  - Food wrappers and waste
  - Non-recyclable packaging

# Am I a Large Quantity Generator ?

**Once you know how much of each type of waste you make,  
compare your hazardous waste totals to these cut offs.**

## Large Quantity Generators Create Per Month

- 2200 lbs or more nonacute hazardous waste  
~Five 55-gallon drums or 250 gallons  
AND/OR
- Greater than 2.2 lbs of acute or severely toxic hazardous waste  
AND/OR
- Greater than 220 lbs of contaminated soil, water, or debris from clean-up of  
acute or severely toxic hazardous waste



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# **“Just Keep Swimming”**

Dory





# Oh No, I am. Now What?

## Notification and Site Identification Number

- Initial notification
- Renotification during Biennial Reporting every even number year
- Michigan Site ID Form (EQP5150)
- Federal Site Identification form (SI 8700-12)

## Offsite Treatment, Storage, or Disposal Facility

- Must use a licensed facility or exempt hazardous waste recycling facility
- Must use universal waste facility for hazardous waste managed as universal waste

**Must use licensed and registered hazardous waste transporters**



# Oh No, I am. Now What?

## Manifest for shipments

- Must use Uniform Hazardous Waste Manifest (EPA Form 8700-22)
  - Paper or Electronic (E-Manifest)
- If the waste meets the US DOT hazardous material definition, then the US DOT shipping document requirements must be met
- Can track through e-manifest

Please print or type. Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of 3	3. Emergency Response Phone	4. Manifest Tracking Number
5. Generator's Name and Mailing Address					
Generators Site Address (if different than mailing address)					
Generators Phone					
6. Transporter 1 Company Name					U.S. EPA ID Number
7. Transporter 2 Company Name					U.S. EPA ID Number
8. Designated Facility Name and Site Address					U.S. EPA ID Number
Facility's Phone					
GENERATOR	9a. Hbl	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	11. Total Quantity	12. Unit (WT./Vol.)
	1		Type		13. Waste Codes
	2				
	3				
	4				
14. Special Handling Instructions and Additional Information					
15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this manifest are true and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, packaged, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this manifest conform to the terms of the attached EPA Approval of Consent. I certify that the waste minimization statement identified in 40 CFR 261.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's Officer's Printed/Typed Name					
Signature					
Month Day Year					
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:				
	Then exporter signature (for exports only):				
	17. Transporter Acknowledgment of Receipt of Materials				
Transporter 1 Printed/Typed Name					
Signature					
Month Day Year					
Transporter 2 Printed/Typed Name					
Signature					
Month Day Year					
DESIGNATED FACILITY	18. Discrepancy				
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
	18b. Alternate Facility (or Generator)				
	Manifest Reference Number: U.S. EPA ID Number				
Facility's Phone					
18c. Signature of Alternate Facility (or Generator)					
Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. 2. 3. 4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a					
Printed/Typed Name					
Signature					
Month Day Year					

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete. DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM



# Oh No, I am. Now What?

## Inspections

- Written weekly container inspections and daily tank inspections.
- Keep records for 3 years
- Check labels are correct and legible, the state of the containers, dates within the accumulation time, and aisle spacing

## Accumulation time

- 90 days

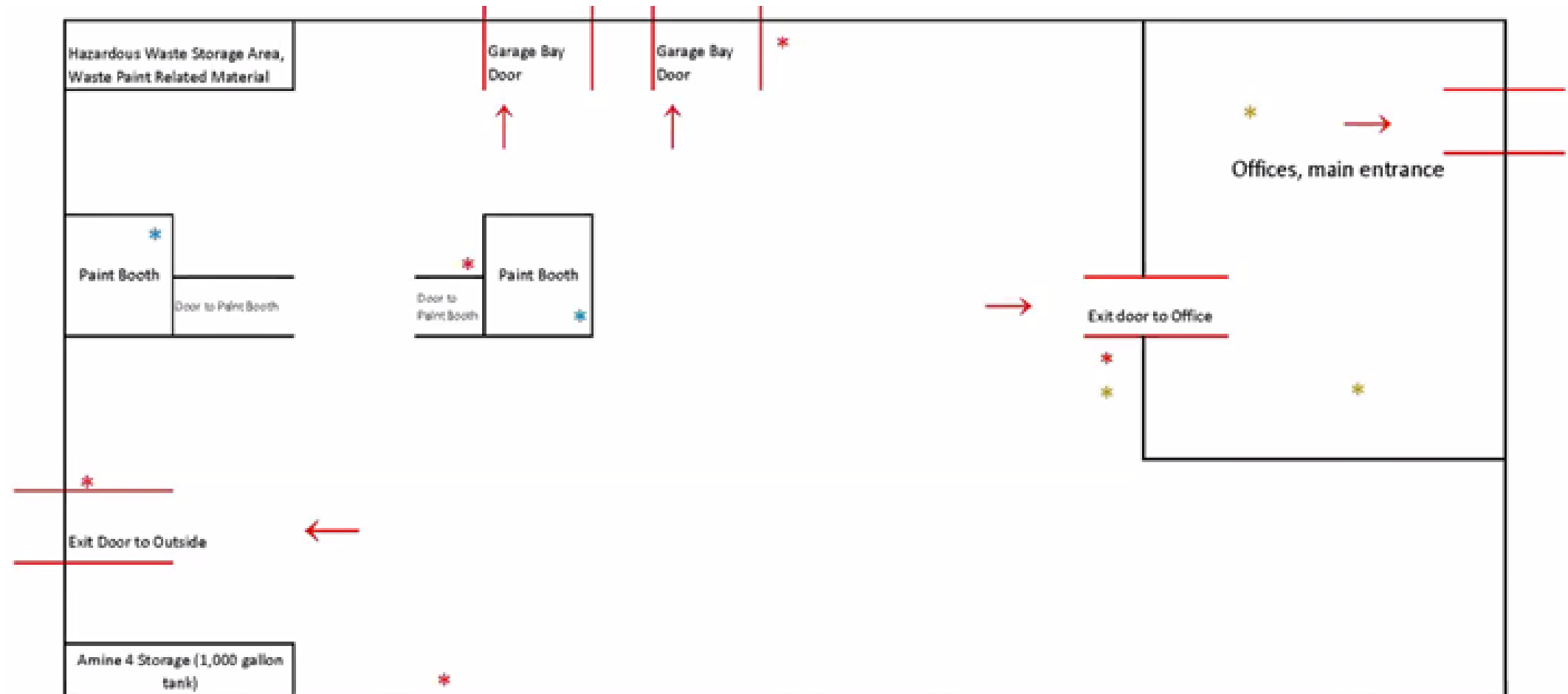


# Oh No, I am. Now What?

## Quick Guide

- Types of waste and hazards with maximum amounts
- Identify any special treatment by medical facilities
- Site map showing generation, accumulation, treatment
- Street map including fire hydrants
- Notification systems (fire alarm, speakers, etc.)
- Names and phone numbers of emergency coordinators

### CONTINGENCY PLAN AND EMERGENCY PROCEDURES FOR LARGE QUANTITY GENERATORS – GUIDANCE



- Satellite Accumulation Area for Paint Related Waste Material (D001, F003, F005)
- Fire Alarms (ring on-site only, there are no fire alarms that notify off-site personnel)
- Telephone for off-site notification of emergency
- Indicates evacuation route out of the building.

**Note 1:** Hazardous waste (paint-related waste) is generated and accumulated inside each of the two paint booths, and is accumulated in the hazardous waste storage area. Amine 4 can be a hazardous waste if it is off-specification. It is generated and accumulated in the SW corner at the Amine 4 tank.

**Note 2:** Smoke detectors are located throughout the office and main warehouse on the ceiling, in a grid about every 25 feet. are connected to an automatic sprinkler system.



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# Oh No, I am. Now What?

## Contingency Plan

**In addition to the quick guide, the plan should include:**

- How to minimize hazards to human health
- Your attempt to make arrangements with emergency services
- Copy sent to local response agencies
- The plan should include:
  - Name and telephone of emergency coordinators
  - List of all emergency equipment
  - Evacuation plan



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# Oh No, I am. Now What?

Ensure waste is properly labeled

- “Hazardous Waste”
- Waste code or descriptive name
- Must have hazards indicated
  - DOT hazard communication label
  - OSHA/MIOSHA hazard statement or pictogram
  - NFPA-compliant labeling

Satellite containers moved to the central accumulation area must be labeled with the accumulation start date.





# Oh No, I am. Now What?

## Storage Rules

- Containers need to be compatible with waste type.
- Containers must be closed.
- No material spilled on the outside of the container.
- No leaks, bulges, or other indications of poor condition.
- No evidence of leaks, spills, or staining in the storage area.
- Secondary containment is needed.
  - Ensure no cracks, damaged coating, etc., to the secondary containment.
- Protected from weather, fire, physical damage, and vandals.
- Adequate aisle space to reach all containers.
- Proper distance from property line.
- Separate incompatible wastes.

# Oh No, I am. Now What?

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- **Record Keeping**

- Land disposal restriction records
- Annual Handler Fee
- Waste Minimization Plan
- Biennial Report
- Notification of closure
- Manifest Tracking
- Exception Reporting
- Waste Characterization



## Oh No, I am. Now What?

- Training Program must be directed by a person trained in hazardous waste management procedures
- Training can be in the classroom, on the job, or both.
- Training is relevant to the position.  
e.g., a dock fork truck operator's training may be different than an operator who generates and places waste into a container.



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# Oh No, I am. Now What?

## Training Should Cover:

- How to respond to emergencies, including where and how to use equipment such as alarm systems.
- Contingency plan procedures
- Response to unplanned sudden or non-sudden releases
- Other procedures needed for the position:
  - How to safely handle the waste.
  - How to properly label containers.

This training is more than right-to-know or hazard communication training.



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**Oh No, I am. Now  
What?**

## **Training Records**

- Document job title, job description, and names for each position that needs training.
- Written description of what training is needed by position.
- When training occurs keep written records.
- Inspectors will compare the records of training given to those positions and employees that need training.



**Oh No, I am.**

**Now What?**

## Who Needs Training?

- Personnel that manage, handle, or move hazardous waste
  - At the point of generation
  - Supervisors
  - Fork truck drivers who move waste
  - Shipping or dock employees
  - Emergency coordinators
  - Waste handlers
- Follow the waste from point of generation to removal offsite to determine who needs training



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**“In three words, I can sum up  
everything I’ve learned about  
life. It goes on.”**

Robert Frost



# OK. That's not so bad.

- Consistency is key.
- Set up a good filing system.
- Utilize existing procedures or systems to help.
  - ISO
  - Quality
  - Lean



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## OK. That's not so bad.

LQG must have a program to reduce amounts and toxicity level of wastes as economically practicable. This waste minimization program should:

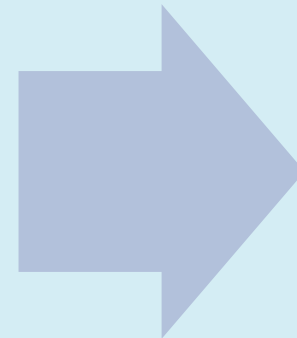
- Consider process changes to produce less scrap
- Ability to use materials that are less toxic
- Have materials shipped in returnable containers
- Encourage continuous improvement including:
  - Workers suggestions on how to minimize waste
  - Employee training in waste reduction
  - Researching other ways to recycle and reuse materials



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# OK. That's not so bad.

Some facilities may be able to reduce the waste produced enough to no longer be large quantity generator in future years.



## Consider the following:

- Can you substitute materials for a non-hazardous version?
- Can you recover and reuse materials in house to decrease amounts needing disposal?
- Are non-hazardous wastes being mixed with hazardous wastes?
- Can inventory systems be improved to limit obsolete materials?



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# What Should I Look Out For?

## State of accumulation areas

- Weekly inspections should be used to ensure waste is stored appropriately
  - Lids closed
  - Legible labels
  - Aisle space to be able to check containers
  - No mystery materials in the area



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# Make it Easy on the Generators









# What Should I Look Out For?

Protect the hazardous waste from weather or vandals

- If waste must be stored outside, make sure it's compatible for the weather
- Ensure only authorized personnel have access to the waste
  - May need ability to lock
- What happens if there is a spill or leak? Where will the material go?



# What Should I Look Out For?

You are responsible Cradle to Grave including:

- Generation
- Transportation
- Treatment
- Storage
- Disposal of hazardous waste

Track your waste through the process.

At 45 days If no confirmation from designated facility you must contact the transporter and/or designated facility to determine status of the waste.

At 60 days an exception report must be submitted electronically.

<https://www.michigan.gov/egle/about/organization/materials-management/hazardous-waste/liquid-industrial-byproducts>

## Forms

- [Site ID, EQP 5150](#)
- [Hazardous Waste Biennial Reporting](#)
- [Hazardous Waste Program Forms and License Applications](#)
- [Hazardous Waste Program Inspection Forms](#)
- [Part 111 Corrective Action Restrictive Covenant Template](#)
- [Uniform Manifest Information](#)
- [Hazardous Waste Monthly-Quarterly Operating Report EQP 5142](#)
- [Generator Notification of Non-Receipt of Hazardous Waste](#)



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# What Should I Look Out For?

Make sure Records are in order

- Biennial hazardous waste reports
- Manifests signed by designated facility
- LDR notices
- Weekly inspections
- Waste Characterization documentation
- No or outdated written contingency plan
- No or outdated quick reference guide
  - Contacts. Contacts. Contacts.



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# EGLLE has LOTS of help

[Waste Webinar Series](#)

[Waste Characterization Record](#)

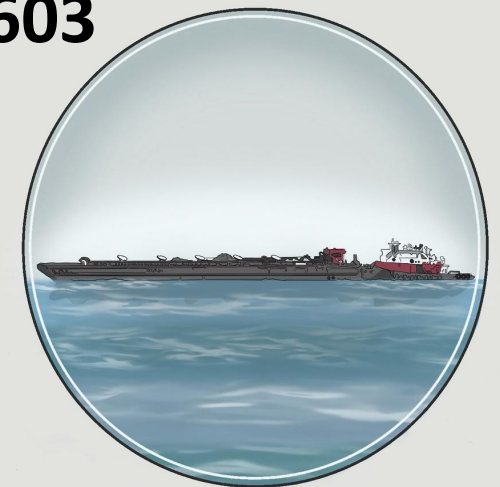
[Contingency Plan](#)

[Inspection Checklist](#)



Questions?

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