	sqg	LQG
Monthly Generation Quantity Limit for non-acute/non- extremely hazardous waste	< 1,000 kg/month §66262.34(d)	≥ 1000 kg/month §66262.34(a)
Monthly Generation Quantity Limits for acute/extremely hazardous waste	≤ 1 kg/month §66262.34(d)(3)	> 1 kg/month §66262.34(a)
HW determination	§66262.11	§66262.11
EPA ID Number	Required §66262.12	Required §66262.12
On-Site Accumulation Quantity Limits	6000 kg §66262.34(d)(1) 1 kg acute/extremely	No Limits
Accumulation Time Limits for non-acute/non- extremely hazardous waste  California never adopted the CESQG federal regulation 40 CFR 261.5. Generators of <1,000 kg/ month are classified as SQGs in California. One exception is accumulation time limit starts for <100 kgs waste.	≤180 days or ≤270 days (if > 200 miles) §66262.34(d)*  If an SQG's quantity of HW generated does not exceed 100 kg in the first or subsequent month, the applicable accumulation time limit above begins when the generator first accumulates 100 kg of HW HSC §25123.3(c)  *Does not include returned wastes 66262.34(g) & (h)	≤90 days §66262.34(a)
Accumulation Time Limits for acute/extremely hazardous waste	≤90 days from the date the 1Kg on-site accumulation quantity limit is reached HSC §25123.3(h)(1)(C)	90 days from the date 1Kg of acutely/extremely hazardous waste is first accumulated HSC §25123.3(c)
Accumulation Time Extensions (for unforeseen, temporary, or uncontrollable circumstances)	For RCRA hazardous waste, a 30-day extension may be granted by DTSC §66262.34(c) 40 CFR 262.34(f)	For RCRA hazardous wastes, a 30-day extension may be granted by DTSC §66262.34(c)

	For non-RCRA hazardous waste, a 90-day extension may be granted by the CUPAs §66262.35	For non-RCRA hazardous waste, a 90-day extension may be granted by the CUPAs §66262.35
Storage Requirements	Basic requirements with technical standards for containers and tanks 40 CFR 262.34(d)(2),(3) & (4)	Full compliance for management of tanks, containers, drip pads, or containment buildings §66262.34(a)(1)
Use and Management of Containers	40CFR 265.171177, except .176 & .178	§66265.171178
Container Marking/Labeling	Required §66262.34(f) Label as "Hazardous waste" w/start date, and include additional information (i.e., physical composition, hazard properties, name and address of generator)	Required §66262.34(f)  Label as "Hazardous waste"  w/start date, and include additional information (i.e., physical composition, hazard properties, name and address of generator)
Marking/Labeling Returned wastes	Required §66262.34(h)	Required §66262.34(h)
Closed Container Requirement	Closed except when adding/ removing wastes 40CFR 265.173(a)	Closed except when adding/ removing wastes §66265.173(a)
Container Condition	Free of severe rust, major dents, leakage. 40CFR 265.171	Free of severe rust, major dents, leakage. §66265.171
Compatibility of wastes w/Container	Required 40CFR 265.172 Container compatible with waste placed in it.	Required §66265.172 Container compatible with waste placed in it.
Container Inspection	Required 40CFR 265.174 Must inspect weekly (no written logs required)	Required §66265.174 Must inspect weekly (no written logs required)
Special container requirements for storing	None	Container must be located ≥50 feet from property line

Ignitable		§66265.176
/Reactive Wastes Special container requirements for storing incompatible wastes	Required 40 CFR 265.177 Incompatibles must not (1) be placed in same container, (2) must not be place in unwashed container that previously held an incompatible waste, and (3) must be properly separated from other incompatible wastes (e.g., by dike, berm)	Required §66265.177 Incompatibles must not (1) be placed in same container, (2) must not be place in unwashed container that previously held an incompatible waste, and (3) must be properly separated from other incompatible wastes (e.g., by dike, berm)
Subpart CC Air Emissions for Containers	Not required	Required §66265.1087  Applies if >26 gallons and holds a VOC containing waste of >500 ppm. Must accumulate in tightly closed DOT container only.  Does not include containers in Satellite Accumulation Areas (§66265.1080(a)/66265.1)
Container Aisle Space	Required 40CFR 265.35 Must leave enough room for unimpeded access to container	Required §66265.35 Must leave enough room for unimpeded access to container
Satellite Accumulation (Point of Generation)	Up to 55 gallons (or 1 qt. acutely or extremely HW) per waste stream, at or near point of generation, under control of operator, mark with 2nd (fill) date once full. Accumulate for up to 1 year total or 180 days from fill date, whichever is first.  §66262.34(e) ALSO: HSC 25200.3.1 (laboratories)	Up to 55 gallons (or 1 qt. acutely or extremely HW) per waste stream, at or near point of generation, under control of operator, mark with 2nd (fill) date once full. Accumulate for up to 1 year total or 180 days from fill date, whichever is first.  §66262.34(e)  ALSO: HSC 25200.3.1 (laboratories)
Empty containers (> 5 gallons)	Mark with date emptied & manage within 1 year unless returned to vendor for refill §66261.7(e), (f) & (i)	Mark with date emptied & manage within 1 year unless returned to vendor for refill §66261.7(e), (f) & (i)

Tank Management	40CFR 265.201	§66265.190202, except for .197(c) & .200
Tank Marking	Required §66262.34(f)  Label as "Hazardous waste" w/start date, and include additional information (i.e., physical composition, hazard properties, name and address of generator	Required §66262.34(f) Label as "Hazardous waste" w/start date, and include additional information (i.e., physical composition, hazard properties, name and address of generator)
Marking/Labeling Returned wastes	Required §66262.34(h)	Required §66262.34(h)
Tank System Integrity Assessment	Not required	Required § 66265.191/192(a) § 66265.193(i)(2) Frequency and contents of assessment dependent upon waste and installation date of tank.
Tank System Secondary Containment & Leak Detection	Not required	Required § 66265.193 § 66265.193(m)(2)(A) Some aboveground piping/ancillary equipment may be exempt if inspected daily.
Tank Operation/Spill Prevention	Some controls required. 40CFR 265.201(b)(2) & (3) Must keep 2' freeboard on open top tanks unless in containment with volume to hold those 2'. If continuously fed tank must have measures to prevent overfill (e.g. waste cutoff or diversion tank).	Controls required §66265.194  Spill prevention (e.g. check valves), overfill prevention (e.g. high level alarms), and for uncovered tanks maintenance of freeboard of 2 feet unless the tank is equipped with containment structure.
Tank Inspection	No written logs required 40CFR 265.201(c) Daily inspection of discharge controls (e.g. bypass systems), monitoring data, and level in tank. Weekly inspection of tank	Required daily. §66265.195 Written logs required.

	and containment for leaks.	
Tank Release Response	Not required	Required §66265.196 Within 24 hours must drain tank to level to prevent further release, clean up all waste in containment, report to DTSC (unless <1lb or immediately cleaned up)
Subpart CC Air Emission Standards for Tanks	Not required	Required 66265.1085(c)) -Tank <19,000 gal, holds VOC >500 ppm (by weight) needs fixed roof §§66265.1083(b) & -Tank holding VOCs that does not meet criteria above, has cover and control/closure devices §66265.1085(d)
Contingency Plan	Basic plan only. 40 CFR 262.34(d)(5)(i) & (ii) Must post info near phone -Name & number of emergency coordinator -Location of emergency equipment -911 or local fire department number	Full plan required. §66265.5154  Must review and update with any relevant change.  Must include OES phone #, name and office and home phone #s of contacts, all emergency equipment (capabilities and location), and evacuation plan.
Emergency Procedures	Required 40 CFR 262.34(d)(5)(iv)	Required §66265.5556
Activation/ Notification	Notify National Response Center at 800-424-8802 40CFR 262.34(d)(5)(iv)(C)	Immediately notify; Within 15 days, notify in writing of any incident that activates plan §66265.56(a) and §66265.56(d) & (j)
Preparedness and Prevention	Required 40 CFR 265.3037	Required §66265.3037

Emergency	Must have internal	Must have internal
Equipment	communications device, external	communications device, external
Equipment	communication device (phone),	communication device (phone),
	fire extinguishers, spill control	fire extinguishers, spill control
	and decon equipment.	and decon equipment.
	40CFR 265.32	§66265.32
Inspection/	Tested and maintained as	Develop schedule for inspection
Maintenance	necessary to respond to	of all emergency equipment.
	emergency 40CFR 265.33	Maintain written logs of
		inspections with any corrections.
		and 66265.33
		aa 00_00.00
Facility	Maintained and operated to	Maintained and operated to
1	minimize possibility of release,	minimize possibility of release,
Maintenance		•
	fire or explosion 40CFR 265.31	fire or explosion §66265.31
Personnel Training	Basic training required	Required
	40 CFR 262.34(d)(5)(iii)	§66265.16
Training Plan	Not required	Written plan required
		§66265.16(a) & (d)
		Includes: job titles or HW related
		positions, description of each job
		title (including duties), name of
		each person at each job title,
		type and frequency of training
	Not an extend	Dec. Seed
Training Records	Not required	Required
		§66265.16(d) & (e)
		Maintain documentation of
		initial and ongoing for current
		employees until facility closure.
		Former employee records
		maintained for 3yrs from date of
		last work.
Frequency of	Not required	Within 6 months of hire, at
	Not required	frequency noted in plan,
Training		
		annually for emergency response
		§66265.16(c)
20.00	Demined CCCCC 20	Demined SCC2C2 20
Manifest and	Required §66262.20	Required §66262.20
Consolidated		
Manifest	Consolidated manifesting for	Consolidated manifesting may
	select wastes.	be used for select wastes
	HSC 25160.2	IF the facility is an LQG who
		•

		qualifies when they perform a count for the purposes of "consolidated manifesting. (i.e., subtracting the amount of used oil from its total monthly) quantity limits.  HSC 25160.2(c)(1, 2)
Off-site Management	Must send to a state approved	Must send to a state approved
of Waste	or RCRA permitted/interim status	or RCRA permitted/interim status
	facility	facility
	§66262.20(b)	§66262.20(b)
Biennial Report	Not required	Required §66262.41 Submit by March 1 every even numbered year for prior 2 years activities. Maintain onsite. RCRA LQGs only.
Recordkeeping Requirements		
Manifest Submittal to DTSC	Required §66262.21(f) Generator submits legible photocopy to DTSC See also HSC 25160(a)(3)	Required §66262.21(f) Generator submit legible photocopy to DTSC See also HSC 25160(a)(3)
Land Disposal Restrictions (LDRs)	Required §66268.7; HSC §25179.5	Required §66268.7; HSC §25179.5
Manifest Exception	Required	Required
Reports	§66262.42(c) File report noting no receipt of TSDF copy if not received within 60 days	§66262.42(b) File report noting no receipt of TSDF copy if not received within 45 days
DOT Transport	Yes	Yes
Requirements	§§66262.30-66262.33	§§66262.30-66262.33
Generator closure	Tank cleaning 67383.3	Required 66265.111 & .114 and 67383.3