

VSQG Inspection Process

Guidance on Hazardous Waste Requirements for Very Small Quantity Generators



Introduction

The Department of Natural Resources conducts inspections at facilities generating hazardous wastes to verify that wastes are appropriately identified and managed, in order to protect both human health and the environment. The department's hazardous waste program, authorized by the U.S. Environmental Protection Agency, requires the department to conduct unannounced inspections. The department has statutory authority for these inspections under [s. 291.91, Wis. Stats.](#) The hazardous waste program conducts these facility inspections based on current records, or additional information indicating that a facility generates hazardous waste.

Hazardous Waste regulations are found in chapters [NR 660-679](#) of the Wisconsin Administrative Code.

This document is intended to provide hazardous waste generators with an outline of what to expect during and after the inspection, and is specific to Very Small Quantity Generators, meaning generators who:

- Generate in any calendar month **no more than** 220 pounds of hazardous waste,
- Generate in any calendar month **no more than** 2.2 pounds of acute hazardous waste,
- Store at any time **no more than** 2.2 pounds of acute hazardous waste, and
- Store at any time **no more than** 2,200 pounds of non-acute hazardous waste.

Regulations specific to VSQG facilities are found in s. NR 662.220, Wis. Adm. Code and the full definition of a VSQG can be found in ch. NR 660.10(139), Wis. Adm. Code.

Residues or contaminated soil, waste, or other debris resulting from the clean-up of a spill, into or on any land or water, may be hazardous wastes.

During the Inspection

The primary elements of a hazardous waste inspection include:

Opening conference. The inspector will explain the process and ask the facility representative to describe operations and generated wastes. It is typical to discuss both solid waste and hazardous waste streams and the processes that generate them.

Walk-through of the facility. The inspector will focus on areas where waste is generated and accumulated or stored. The inspector will also look at spill equipment, safety and fire equipment, the outside of the building, and loading areas.

Records review. Records may be reviewed either on site or as part of a follow-up or evaluation period. See the Records Review section later in this document for details.

Closing conference. The inspector will share findings, provide resources and discuss next steps with the facility representative. Some violations noted during the inspection may be resolved at the time of the inspection and documented by the inspector (example: open container violations).

VSQG Records Review

The following records are typically requested during a Very Small Quantity Generator inspection. Additional records may be required based on hazardous waste activities at the site:

1. **Waste determinations** – it is recommended that adequate written documentation of waste determinations for each waste generated at the facility currently or in the past three years.
2. **Hazardous waste manifests** – if applicable, from the last three years of operation. [NR 662.040(1); 662.014(6)]
3. **Manifest Exception Reports** – if applicable, from the last three years of operation. [NR 662.040(2); 662.014(6)]
4. **Appropriate documentation** – for any waste that the facility is claiming to be excluded or exempt from regulations. [NR 661.0002(6)]
5. **Universal Waste** – waste inventories or shipping papers are typically utilized to demonstrate accumulation of less than one year. [NR 673.15(3)]
6. **Excluded solvent-contaminated wipes** – if applicable. [NR 661.0004(1)(z)]
 - a. Written description of the process used to remove free liquids prior to transport, and collection of free liquids.
 - b. Documentation of the removal off-site for laundering or disposal.
 - c. Name and address of laundry or disposal facility.

After the Inspection

Following the inspection and subsequent review of the facility records, the inspector will provide a letter describing any alleged violations or areas of concern and instructions on how to return to compliance. The department encourages facilities to contact the inspector directly when further discussion or clarification on an issue is needed.

The facility could receive a notice of no noncompliance (NONN), notice of noncompliance (NON) or potentially a notice of violation (NOV). For straightforward inspections and evaluations, written correspondence, when provided as a NONN or NON, is typically sent to the facility representative within 45 days of the inspection. It is the responsibility of the facility to take measures to return to compliance. When the department determines no further action is required, the facility will receive written documentation.

The department typically asks that the facility to respond within 30 days from the date of the NONN or NON letter.

Further enforcement actions may occur in some cases, due to repeat or serious violations, inappropriate disposal of a hazardous waste or failure to return to compliance in a timely manner.

Resources and Contact Information

For more information, including [publications, inspection forms, and administrative codes and statutes](#), go to dnr.wi.gov and search “hazardous waste resources”. Use the *Additional Resources* menu to navigate to specific topics. For staff contact information, go to the [staff directory](#), enter “hazardous waste requirements” in the subject field and choose the appropriate county contact.

Mailing address: DNR Waste & Materials Management Program, PO Box 7921 Madison, WI 53707

Email: DNRWasteMaterials@Wisconsin.gov

PUB-WA-1869 2020

***Disclaimer:** This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.*

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