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Comparison of Hazardous Waste Generator Requirements

The chart below provides a comparison of requirements for three categories of waste generators: Conditionally Exempt Small Quantity Generator (CESQG); Small Quantity Generator (SQG); and Large Quantity Generator (LQG). Chapters listed at the top of the columns refer to Title 128 – Nebraska Hazardous Waste Regulations.

Requirement	CESQG (Chap 8)	SQG (Chap 9)	LQG (Chap 10)
Identify Hazardous Waste (Chap 4)	Yes	Yes	Yes
Generation Limits	≤ 100 kg/mo (≤ 220 lb/mo)	Between 100 and 1,000 kg/mo (Between 220 and 2,200 lb/mo.)	≥ 1,000 kg/mo (≥ 2,200 lb/mo)
Acute Hazardous Waste Limits	≤ 1 kg/mo (≤ 2.20 lb/mo)	≤ 1 kg/mo (≤ 2.20 lb/mo)	> 1kg/mo (> 2.2lb/mo)
Facility Receiving Waste	State approved or RCRA permitted	RCRA-permitted facility	RCRA-permitted facility
USEPA ID Number (Chap 4)	Not required	Required	Required
RCRA Personnel Training	Not required	Familiarization required	Required
DOT Training (49 CFR)	Required	Required	Required
Exception Report	Not required	Required > 60 days	Required > 45 days
Biennial Report	Not required	Not required	Required (Chap 4)
On-site accumulation limits (without permit)	≤ 1,000 kg (≤ 2,200 lb)	≤ 6,000 kg (≤ 13,200 lb)	Any quantity
Accumulation Time Limits (without permit)	None	≤ 180 days or ≤ 270 days if ≥ 200 miles to disposal facility (Chap 9)	≤ 90 days + an additional 30 days if granted extension by NDEQ (Chap 10)
Storage Requirements	None	Basic standards for containers or tanks (Chap 9)	Full compliance with management of containers or tanks (Chap 10)
Arrangements With Local Authorities	None	Required (Chap 17)	Required (Chap 17)
Emergency Equipment & Communications	None	Required (Chap 17)	Required (Chap 17)
Contingency Plan	None	None	Required (Chap 18)
Emergency Coordinator	None	Required	Required
Telephone Information	None	Post information by phone	In Contingency Plan
Use Manifests	No	Yes, unless waste is reclaimed under contractual agreement	Yes