

A guide for businesses using household hazardous waste facilities for disposal



COLORADO
Hazardous Materials
& Waste Management Division
Department of Public Health & Environment

Businesses that are very small quantity generators (VSQGs) of hazardous waste are allowed to dispose of their hazardous waste at specific household hazardous waste (HHW) facilities. A list of HHW facilities authorized to accept hazardous waste from VSQGs is available at <https://www.colorado.gov/pacific/cdphe/VSQG-waste-programs>.

Determining whether a waste is hazardous waste

Businesses that generate the following wastes must make a hazardous waste determination on each of these items:

- Aerosol cans.
- Antifreeze.
- Dental waste.
- E-cigarette waste.
- Electroplating waste.
- Flares.
- Mercury-containing bulbs.
- Motor oil.
- Oil-based paint.
- Shop rags.

This list is not exhaustive, and a hazardous waste determination must also be made on waste that may be ignitable, corrosive, reactive or toxic. Waste determined to be a hazardous waste, must be managed in compliance with Colorado's Hazardous Waste Regulations, 6 CCR 1007-3 (the regulations).

When making a hazardous waste determination, product labels and Safety Data Sheets (SDS) can assist businesses with this process because they typically provide information regarding the hazardous characteristics, if any, of the product. Especially helpful are the Globally Harmonized System's (GHS) pictograms displayed on product labels and SDS.

Definition of a very small quantity generator (VSQG) of hazardous waste

Hazardous waste generators are divided into three different categories based on the amount of waste a facility generates in a calendar month. Pursuant to the regulations, VSQGs are businesses that generate no more than 100 kilograms (approximately 220 pounds) of non-acute hazardous waste and no more than 1 kilogram (approximately 2.2 pounds) of acute hazardous waste per calendar month. VSQGs must not accumulate more than 1,000 kilograms (approximately 2,200 pounds) of hazardous waste at any time and must ensure their hazardous waste is sent to a facility that is authorized to manage this waste, like an HHW facility.

HHW facilities may require VSQGs to select the appropriate waste codes to include on a hazardous waste shipping manifest. Waste codes indicate what waste is being shipped and the hazards associated with each. Information regarding how to select proper waste codes is provided below.

Hazardous waste characteristics and selecting correct waste codes

The following is to be used as guidance only and should not be relied upon in lieu of the regulations. Not all regulatory requirements are included below.

If the waste in question falls into one or more of the following four categories below it is a hazardous waste:

1. Exhibits one or more of the four hazardous waste characteristics identified below and outlined in section 261, Subpart C of the regulations.
 - a. Ignitability
 - i. A liquid that has a flashpoint of less than 140°F (e.g. solvents, mineral spirits, and paints).
 - ii. Not a liquid, but capable under standard pressure and temperature of causing a fire (e.g. pyrophoric metals like sodium or phosphorous that react with air).
 - iii. Certain compressed gases (e.g. inorganic peroxides, nitrates, chlorates and permanganates). See section 261.21(a)(3) of the regulations.
 - iv. An oxidizer as defined by the U.S Department of Transportation.
 - b. Corrosivity
 - i. A liquid that has a pH of less than or equal to 2, or greater than or equal to 12.5 (e.g. rust removers, and battery acid).
 - ii. A liquid that corrodes steel at a rate greater than 0.25 inches per year within specific parameters (e.g. copper or ferric chloride used to etch metal). See section 261.22 of the regulations.
 - c. Reactivity
 - i. Unstable and readily undergoes violent change without detonating.
 - ii. Reacts violently with water.
 - iii. Forms potentially explosive mixtures with water.
 - iv. When mixed with water, generates toxic gases, vapors or fumes (e.g. acetic anhydride, potassium peroxide, phosphorous pentoxide, and sodium phosphide).
 - v. Is a cyanide or sulfide-bearing waste which when exposed to corrosive pH conditions (pH=<2 or >12.5) can generate toxic gases, vapors or fumes.
 - vi. Is capable of detonation or explosive reaction if subjected to a strong initiating source or if heated under confinement.
 - vii. Is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.
 - viii. Is a forbidden explosive under 49 CFR section 173.54 or a Division 1.1, 1.2, or 1.3 explosive under 49 CFR sections 173.50 and 173.53
 - d. Toxicity
 - i. If the waste contains contaminants listed in Table 1 of section 261.24 of the regulations at a concentration equal to or greater than the value given in the table.
2. Is fatal to humans in low doses.
3. Contains any toxic constituents listed in Appendix VIII of section 261 of the regulations.
4. Is a listed hazardous waste in section 261.30, Subpart D, of the regulations.

Compliance tips

- Make a hazardous waste determination regarding each waste generated. Every business is responsible for identifying their hazardous waste and managing it properly. As a best management practice, document all hazardous waste determinations.
- Knowing what products are on site and how they are used can help when making a hazardous waste determination.
- If additional help is needed, contact CDPHE's customer technical assistance line at (303) 692-3320 or reference additional guidance on our website at <https://www.colorado.gov/pacific/cdphe/hwguidance>.