



Agency of Natural Resources  
Waste Management & Prevention Division  
103 South Main Street  
Waterbury, VT 05671-0404  
[cathy.stacy@state.vt.us](mailto:cathy.stacy@state.vt.us) (802)479-8731

**INSIGNIFICANT WASTE MANAGEMENT EVENT APPROVAL (IWMEA)  
GUIDANCE DOCUMENT FOR  
HHW/CEG Hazardous Waste Collection Events  
Revised 2/7/12**

**Introduction**

The Vermont Solid Waste Management Rules (SWMR) authorizes the Secretary of the Agency of Natural Resources (Agency) to allow certain wastes to be collected and stored for up to one (1) day pursuant to an Insignificant Waste Management Event Approval (IWMEA). Section 6-1206 (d)(1) of the SWMR allows household hazardous waste (HHW) and conditionally exempt generator (CEG) hazardous waste collection events to be conducted at sites approved pursuant to Section 6-301(c) of the SWMR.

This Guidance Document outlines the application, operation, and reporting requirements for HHW/CEG hazardous waste collection events conducted under IWMEAs.

**Findings**

An IWMEA may only be issued if the Secretary finds that: (1) the collection event(s) will not result in a threat to public health and safety or to the environment, and will not create a nuisance; and (2) if CEG hazardous waste is being collected during the event(s), an EPA Site Identification Number has been assigned to the facility or event location **prior** to the date of the event(s).

**EPA Site Identification Numbers (EPA Site ID#) – Permanent and Temporary**

An EPA Site ID# must be obtained for any event that includes the collection of CEG hazardous waste. While a permanent EPA Site ID# is required for any such event conducted at a certified Solid Waste Management Facility, a temporary EPA Site ID#, which is active for a period up to six months, may be obtained for CEG hazardous waste collection events conducted at other locations.

A permanent EPA Site ID# may be obtained by submitting a *Vermont Hazardous Waste Handler Site ID Form* to the Waste Management Division (WMD) **at least three (3) weeks** prior to the date when CEG hazardous waste is first scheduled to be collected at a certified Solid Waste Management Facility. Any facility that obtains a permanent EPA Site ID# is required to keep an up-to-date *Vermont Hazardous Waste Handler Site ID Form* filed with the WMD.

A temporary EPA Site ID# is obtained from the WMD through the IWMEA application process.

If you have questions about how to obtain an EPA Site ID# and/or the *Vermont Hazardous Waste Handler Site ID Form*, please call (802)479-8741. The *Vermont Hazardous Waste Handler Site ID Form*, along with instructions, is also available at: <http://www.anr.state.vt.us/dec/wastediv/rcra/handlers.htm>

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### **Applications**

A completed IWMEA application must be submitted to the *Solid Waste Management Program* **at least three (3) weeks prior to the date of a collection event**. An application, which is specific to the site where an event is to be held, consists of: the application form; a Safety, Accident and Contingency Plan; and a site map. Please review your application prior to submittal to verify that the application form is completely filled out and the necessary attachments are included. If a submitted application is found to be incomplete, the Agency review will be suspended until all required information is provided. Please submit your application to the *Solid Waste Management Program* at the address listed above.

While a single application may be submitted for multiple events to be held at the same site (different dates), and an application package may be submitted for multiple events to be held at different sites (see below), new IWMEA applications must be submitted each year.

#### **Multiple Collection Events at the Same Site**

A single application may be submitted for multiple collection events being held at the same site (on different dates) during a calendar year. The start and end date(s) for each collection event must be identified on the application form.

#### **Collection Events at More Than One Site**

“Application packages” may be submitted for multiple collection events to be held at different sites. While this is encouraged, each package must include separate applications for each site where an event is scheduled to occur.

If you have any questions, please call (802)479-8731. The application form, along with this Guidance Document, is available at: <http://www.anr.state.vt.us/dec/wastediv/solid/permit.htm>

### **IWMEA Duration**

An IWMEA is only effective for the specific date(s) identified in the approval letter.

### **Applicant**

The Applicant, which may be a solid waste district, municipality, municipal alliance, or private site owner, **is responsible** for ensuring that:

- Waste is managed properly throughout the event and is properly transported off-site upon completion of the event. The applicant is responsible for compliance with the Vermont Hazardous Waste Management Regulations (VHWMR) for any CEG waste accepted at an event (i.e., the applicant must comply with VHWMR “Generator” requirements for this waste upon collection).
- Only the HHW and CEG hazardous wastes identified in the IWMEA are accepted during the collection event.
- The Transporter/Contractor (see below) has obtained any necessary waste transportation permits and complies with applicable requirements of the SWMR, the VHWMR, and the IWMEA.
- Information about all wastes accepted during the event (types and quantities) are reported to the appropriate state personnel (as described below) and all applicable waste taxes are paid.
- A completed HHW/CEG Survey Form is submitted on time (see “Additional Reporting” below).

**Important Note:** When CEG hazardous waste is mixed with HHW, the combined waste becomes subject to regulation as hazardous waste and must be shipped as a hazardous waste.

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### **Transporter/Contractor**

The Transporter/Contractor must hold a valid Vermont Waste Transportation Permit and is the person responsible for packaging, labeling, and transporting all collected HHW/CEG hazardous wastes to a certified hazardous waste facility, or a certified Solid Waste Management facility upon completion of the collection event. The Transporter/Contractor may sign a manifest and/or bill of lading as “Offeror” for the Applicant.

### **Contact Person**

The Contact Person is a person who represents the Applicant and may be contacted by the Solid Waste Program for information about an application or planned collection event and to whom questions from the public concerning the event may be directed.

### **Responsibility for Compliance**

The Applicant and Transporter/Contractor are responsible for ensuring that all applicable requirements of the SWMR, VHWMR, and the IWMEA are met.

### **Landowners**

The Landowner is the owner of the property where the collection event will occur. The Landowner must provide written approval for use of the site. The Landowner may sign the application form or may submit a separate, written approval. The separate, written approval must be included with the IWMEA application.

### **Other State Permits**

We recommend that you contact the Permit Specialist assigned to the Region in which the collection event site is scheduled to occur. The Permit Specialist will assist in the identification of any other state permits that may be needed for the event. Please see the attached map to identify your local Regional Office where the appropriate Permit Specialist may be contacted.

### **Manifest Requirements**

A manifest shipping document must be utilized when CEG hazardous waste is transported from a certified Solid Waste Management Facility and when collected CEG hazardous waste is transported from a collection event to a permitted hazardous waste facility. A manifest must be completed and submitted as outlined in the manifest instructions which may be obtained at the following web site:

<http://www.anr.state.vt.us/dec/wastediv/rcra/manifests.htm>

**Important Note:** When CEG hazardous waste is mixed with HHW, the combined waste becomes subject to regulation as hazardous waste and must be shipped as hazardous waste.

### **Hazardous Waste Tax Relief**

A report that separately lists all HHW and CEG hazardous waste must be attached to the manifest with amounts of HHW and CEG waste clearly defined in order to take advantage of a reduced hazardous waste tax rate.

Please direct questions relating to hazardous waste tax to the Manifest Coordinator at (802)479-8741 or at the address listed on the top of Page 1 of this Guidance Document.

### **Additional Reporting**

On or before January 15<sup>th</sup>, the Applicant must submit a completed HHW/CEG Survey Form for any collection events held during the preceding calendar year. Please send the form to the address listed at the beginning of this Guidance Document. This survey information is used to oversee SWIP compliance, evaluate HHW/CEG event participation rates over time to identify waste management trends, to evaluate and consider future SWIP implementation grant funding, and to improve the SWIP/IWMEA process. The survey information is also

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shared with Vermont's Hazardous Waste Program for the purposes of reconciling manifest information and hazardous waste tax records.

**Enforcement of Violations**

IWMEA's are enforceable under 10 V.S.A. Chapter 201. Violations of any conditions of the IWMEA, the Vermont Hazardous Waste Management Regulations, or the Vermont Solid Waste Management Rules may subject involved parties to the loss of SWIP implementation grant funding and an enforcement action that may include substantial penalties.

# REGIONAL OFFICES

## DEPARTMENT OF ENVIRONMENTAL CONSERVATION (DEC) DISTRICT ENVIRONMENTAL COMMISSIONS (ACT 250)

### DISTRICTS 1, 8, & 9

450 Asa Bloomer State Office Bldg.  
Merchants Row  
Rutland, VT 05701-5903

|                                   |                 |
|-----------------------------------|-----------------|
| <b>DEC Permit Specialist.....</b> | <b>786-5907</b> |
| DEC Regional Engineer .....       | 786-5900        |
| Act 250 (Dist #1 & 8) .....       | 786-5920        |
| Act 250 (Dist #9) .....           | 879-5614        |
| DEC River Management.....         | 786-5906        |

### DISTRICTS 2 & 3

100 Mineral St, Ste #303  
Springfield, VT 05156

|                                   |                 |
|-----------------------------------|-----------------|
| <b>DEC Permit Specialist.....</b> | <b>885-8850</b> |
| DEC Regional Engineer .....       | 885-8855        |
| Act 250 (Dist #2, 3, & 3A) .....  | 885-8855        |
| DEC River Management.....         | 786-5906        |
| DEC Wetlands .....                | 476-2678        |

### DISTRICTS 4 & 6

111 West Street  
Essex Junction, VT 05452

|                                       |                 |
|---------------------------------------|-----------------|
| <b>DEC Permit Specialist.....</b>     | <b>879-5676</b> |
| DEC Reg. Engineer (Dist #4 & 6) ..... | 879-5656        |
| DEC Reg. Engineer (Dist #9) .....     | 786-5900        |
| Act 250 (Dist #4, 6, & 9) .....       | 879-5614        |
| DEC River Management.....             | 879-5631        |
| DEC Wetlands (Dist #4).....           | 879-2396        |
| DEC Wetlands (Dist #6).....           | 241-3754        |

### DISTRICTS 3A & 5

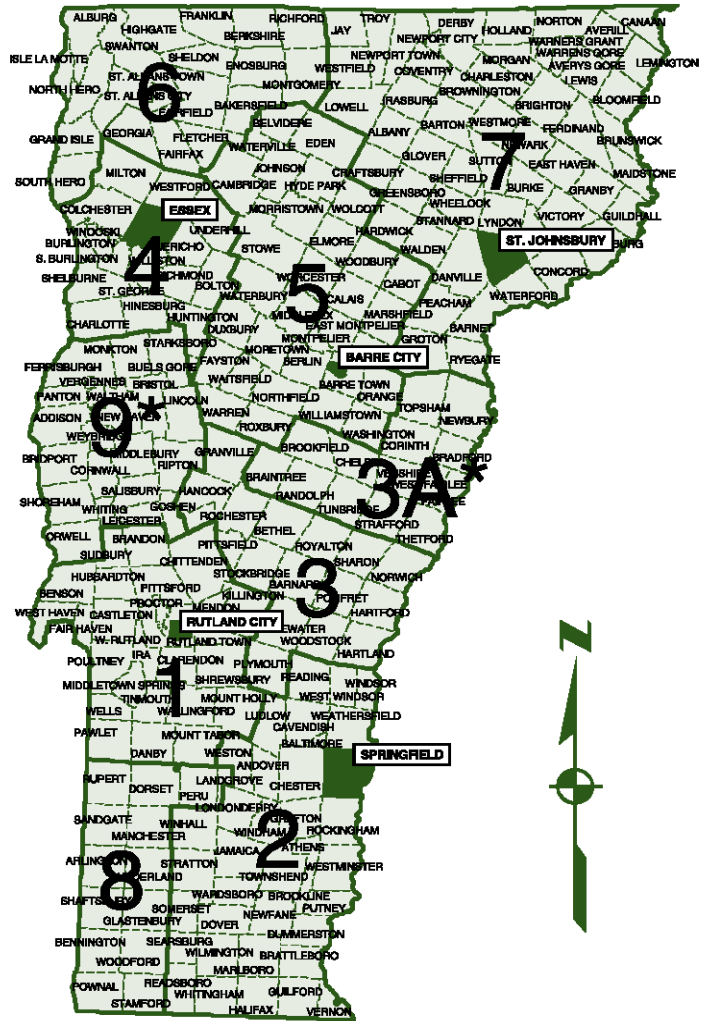
5 Perry Street, Suite 80  
Barre, VT 05641-4282

|                                   |                 |
|-----------------------------------|-----------------|
| <b>DEC Permit Specialist.....</b> | <b>476-0195</b> |
| DEC Regional Engineer .....       | 476-0190        |
| Act 250 (Dist # 3A) .....         | 885-8855        |
| Act 250 (Dist # 5) .....          | 476-0185        |
| DEC River Management.....         | 476-2679        |
| DEC Wetlands (Dist #3A).....      | 476-2678        |
| DEC Wetlands (Dist #5).....       | 241-3762        |

### DISTRICT 7

1229 Portland St-Ste 201  
St. Johnsbury, VT 05819

|   |                 |
|---|-----------------|
| <b>DEC Permit Specialist (Tues) .....</b> | <b>751-0127</b> |
| DEC Regional Engineer .....               | 751-0130        |
| Act 250 .....                             | 751-0120        |
| DEC River Management.....                 | 476-2679        |
| DEC Wetlands .....                        | 241-3762        |



DEC and ACT 250 Regional Office Map

February 17, 2006

#### 3A\* NOTE:

For towns in District 3A, contact the Springfield Office for Act 250 Permits. For Water Supply, Wastewater Disposal and Subdivision Permits, District 3A must contact the Barre Office.

#### 9\* NOTE:

For towns in District 9, contact the Essex Junction Office for Act 250 Permits. For Water Supply, Wastewater Disposal and Subdivision Permits, District 9 must contact the Rutland Office.