

Webinar Series on the Hazardous Waste Generator Improvements Rule

US EPA

Office of Resource Conservation and Recovery

2019

Hazardous Waste Generator Improvements Rule Webinar

Part 3 – Modules 4 through 6

Module 4: Changes to SQG and LQG Standards

Contents of Module 4

- Satellite Accumulation Areas
- Waiver to 50-Ft Requirement
- Waste Accumulation in Drip Pads and Containment Buildings
- Personnel Training for LQGs
- Emergency Preparedness and Planning
- Closure

Satellite Accumulation Areas (SAAs)

- SAA standards are now found in their own part of the generator regulations - §262.15
- What is a Satellite Accumulation Area (SAA)?
 - A location at a generator's facility where the generator accumulates up to 55 gallons of hazardous waste (or 1 quart of acute hazardous waste) in containers that are 1) at or near any point of generation, and 2) under the control of the operator
 - SAAs have fewer requirements than central accumulation areas, provided the generator complies with the regulations in section 262.15

Revisions to SAA Standards

- Changes include:
 - Explicitly state that hazardous wastes not be mixed or placed in a container with other hazardous wastes that are incompatible – applying the same storage standard for SAAs as CAAs in regard to incompatible wastes
 - Allow containers to remain open temporarily under limited circumstances, when necessary for safe operations
 - Provides maximum weight (1 kg) in addition to volume (1 quart) for acute hazardous waste limit

Revisions to SAA Standards (continued)

- Clarifies that “three days” means three consecutive calendar days for when waste must be moved to CAA or permitted TSDF
- Rescinds memo allowing reactive hazardous waste to be stored away from the point of generation
 - If waste is so dangerous it needs to be stored separately, then it needs to go directly to the CAA
- Makes marking and labeling regulations consistent with central accumulation areas
 - Labeled with the words “Hazardous Waste” and the hazards
 - Do not need an accumulation start date but do need to move in 3 calendar days when accumulation limit is reached – either to the CAA or TSDF and mark the date the accumulation limit is reached

Preamble Clarifications re: SAAs

“Under the Control of the Operator” means:

- The operator is someone familiar with the operations generating the HW
- Is aware of and able to attend to these operations, if needed
- Provides some measure of controlled access

Some examples of demonstrating the SAA is under the control of an operator:

- The operator controls access to SAA by access card, key, or lock box
- The operator accumulates waste in a locked cabinet and controls access to the key (even if access to the room is not controlled)
- The operator is regularly in view of the SAA during the course of their job
- The operator is able to see if anyone enters or exits the SAA

* There can be more than one operator having control of the SAA

Waiver to 50-Foot Requirement

What changed?

- Final rule allows LQGs to apply for a site-specific waiver from this requirement from the authority having jurisdiction (AHJ) over the fire code (e.g., fire marshal or fire department) if the AHJ believes that the precautions taken by the facility make the waiver appropriate and safe (§262.17(a)(1)(vi)). The AHJ will help the LQG determine a safe and practical location. The LQG is then required to keep the written approved waiver in their records.

Why the change?

- The generator regulations previously required that containers holding ignitable or reactive waste be located at least 15 m (50 feet) from the facility's property line, with no exceptions. Meeting this requirement could be impossible, especially in urban areas where properties are sometimes less than 100 feet wide



Drip Pads and Containment Buildings

What changed?

- Clarifies that SQGs may accumulate hazardous waste on drip pads and in containment buildings, provided they:
 - Meet the standards found in Part 265, subparts W and DD, for drip pads and containment buildings, respectively
 - Meet all of the conditions specified in § 262.16 for SQGs accumulating hazardous wastes in these units (§ 262.16(b)(4))
- Restated Agency technical guidance and clarified in preamble that VSQGs may accumulate hazardous wastes on drip pads provided they comply with 40 CFR part 265 subpart W standards.
- Note: SQGs only have 90 days to accumulate hazardous wastes in containment buildings

Why the change?

- Drip pads and containment building regulations only addressed LQGs and TSDFs – not SQGs accumulating hazardous wastes
- Therefore, it appeared that SQGs must comply with LQG regulations when generating SQG quantities of hazardous wastes monthly

Personnel Training for LQGs

- Maintains existing regulatory framework/standards, but explicitly allows the use of computer-based tools:
 - “Facility personnel must successfully complete a program of classroom instruction, online training (*e.g.*, computer-based or electronic), or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part.”

(§ 262.17(a)(7)(i)(A))

Emergency Preparedness and Planning

- Generator Rule made a wide variety of revisions to the emergency planning and preparedness standards.
 - SQG regulations—§§262.16(b)(8) & (9)
 - LQG regulations—§ 262.17(a)(6) refers generators to part 262 subpart M
- Revisions are designed to improve emergency responders' ability to respond to events, improving compliance with existing standards, and clarifying ambiguous regulations.
 - Scope of regulations
 - Contingency Plan Quick Reference Guide
 - Documentation of Arrangements
 - Technical Changes

Emergency Preparedness and Planning

Scope of the Emergency Preparedness and Planning Regulations

- Previous emergency preparedness regulations in part 262.34 stated that generators must comply “with the standards for owners and operators in subparts C and D in 40 CFR part 265” for LQGs and “the standards of subpart C of part 265” for SQGs
- Subparts C and D of part 265 do not include applicability statements relevant to generators of hazardous waste, making it unclear where these standards apply at a generator’s site
- Revised regulations clearly specify that the emergency planning and preparedness standards apply where hazardous waste is being generated or accumulated at the generator’s site—including points of generation, satellite accumulation areas, and central accumulation areas (90-day areas)
- One-Plan is still applicable for generators under multiple statutes

Emergency Preparedness and Planning

Contingency Plan Quick Reference Guide

- The Quick Reference Guide is a new part of an LQG's contingency plan designed to provide easy access for emergency responders to the most critical information for an immediate response to an event
- New LQGs submitting contingency plans must also include a Quick Reference Guide
- Existing LQGs to include a Quick Reference Guide when they otherwise update and submit their contingency plan

(§ 262.262)

Emergency Preparedness and Planning

Contingency Plan Quick Reference Guide

- Contents of the Quick Reference Guide (eight elements)
 - Types/names of hazardous waste and associated hazards
 - Estimated maximum amounts of hazardous wastes
 - Hazardous wastes requiring unique/special treatment
 - Map showing where hazardous wastes are generated, accumulated or treated at the facility
 - Map of facility and surroundings to identify routes of access and evacuation
 - Location of water supply
 - Identification of on-site notification systems
 - Name of emergency coordinator(s) or listed staffed position(s) and 7/24-hour emergency telephone number(s)

- EPA encourages generators to work with local emergency authorities and others to identify additional information that could be included

Quick Reference Guide Example (pg 1)

EXAMPLE QUICK REFERENCE GUIDE

This example was created by EPA Region 7 to be used as a guide to assist the regulated community with compliance. It does not substitute for or replace any regulatory requirements.

Contingency plan quick reference guide

ABC FACILITY

1000 SW Main Street

Anytown, Iowa 50000

Facility Contacts:

Primary Emergency Coordinator: George Washington Mobile Number (24/7): 515-555-0000

Secondary Emergency Coordinator: Abraham Lincoln Mobile Number (24/7): 515-555-0001

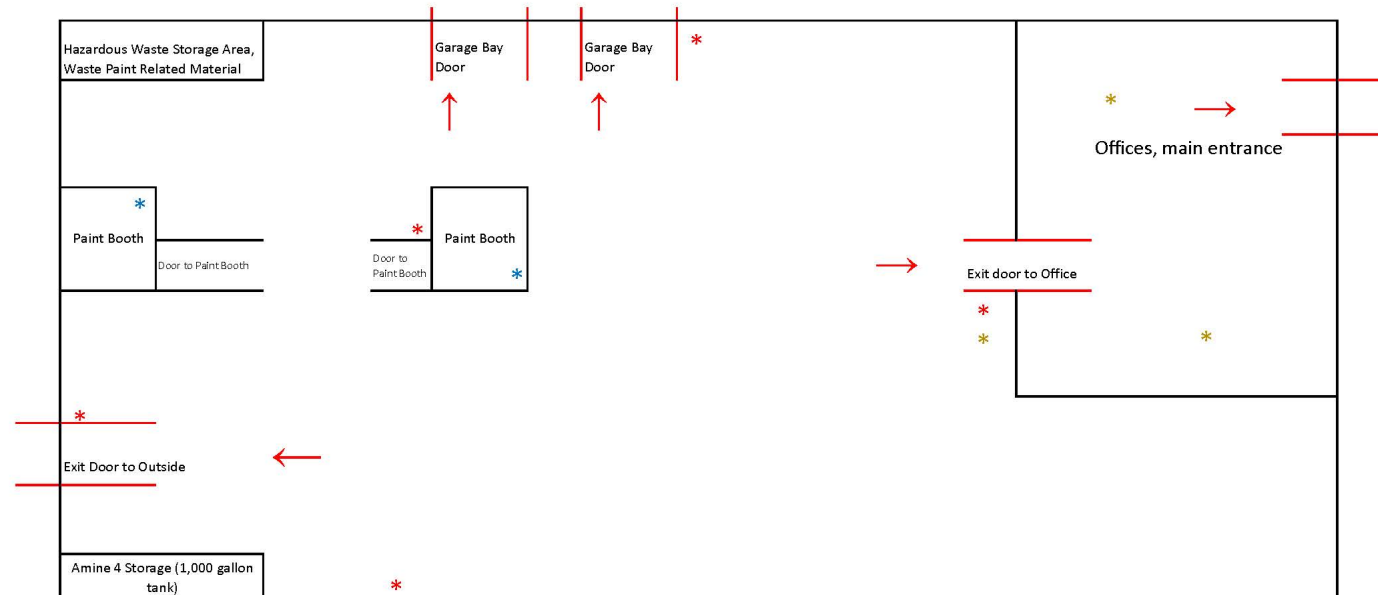
Tertiary Emergency Coordinator: Martha Washington Mobile Number (24/7): 515-555-0002

Note: ABC Facility operates 3 shift, 24/7, but the order of contact during an emergency is listed above.

Hazardous Waste Information:

| Name of Waste | Waste Codes/Hazards | Location Accumulated | Maximum Amounts Present | Response Notes | Special Notes to Hospital/Treatment personnel |
|---|--|--|---|--|---|
| Paint Related Wastes (liquid) | D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity) | NW corner of Warehouse, hazardous waste storage area | Five, 55-gallon drums (2,065 pounds) | If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment. | None |
| Paint Related Wastes (liquid) | D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity) | Two Satellite Accumulation Areas as noted with blue asterisks on the attached map. | One, 55-gallon drum (440 pounds) | If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment. | None |
| Off-specification 2, 4-D, a herbicide, (brand name is Amine 4) (liquid) | D016 (toxicity); Flashpoint 190 °F. | SW corner of warehouse near new product storage of Amine 4. | Off-Spec – 1 tank, 1,000 gallons New product – 1 tank (same tank as off-spec), 1,000 gallons | Use PPE to prevent contact with skin and eyes. Immediately prevent spills from entering drains and waterways. Prevent sources of ignition and open flames. | Contact Chemtrac for emergency medical treatment information at 1-800-424-9300. If in eyes, wash eyes for several minutes. |

Quick Reference Guide Example (pg 2)



- * Satellite Accumulation Area for Paint Related Waste Material (D001, F003, F005)
- * Fire Alarms (ring on-site only, there are no fire alarms that notify off-site personnel)
- * Telephone for off-site notification of emergency

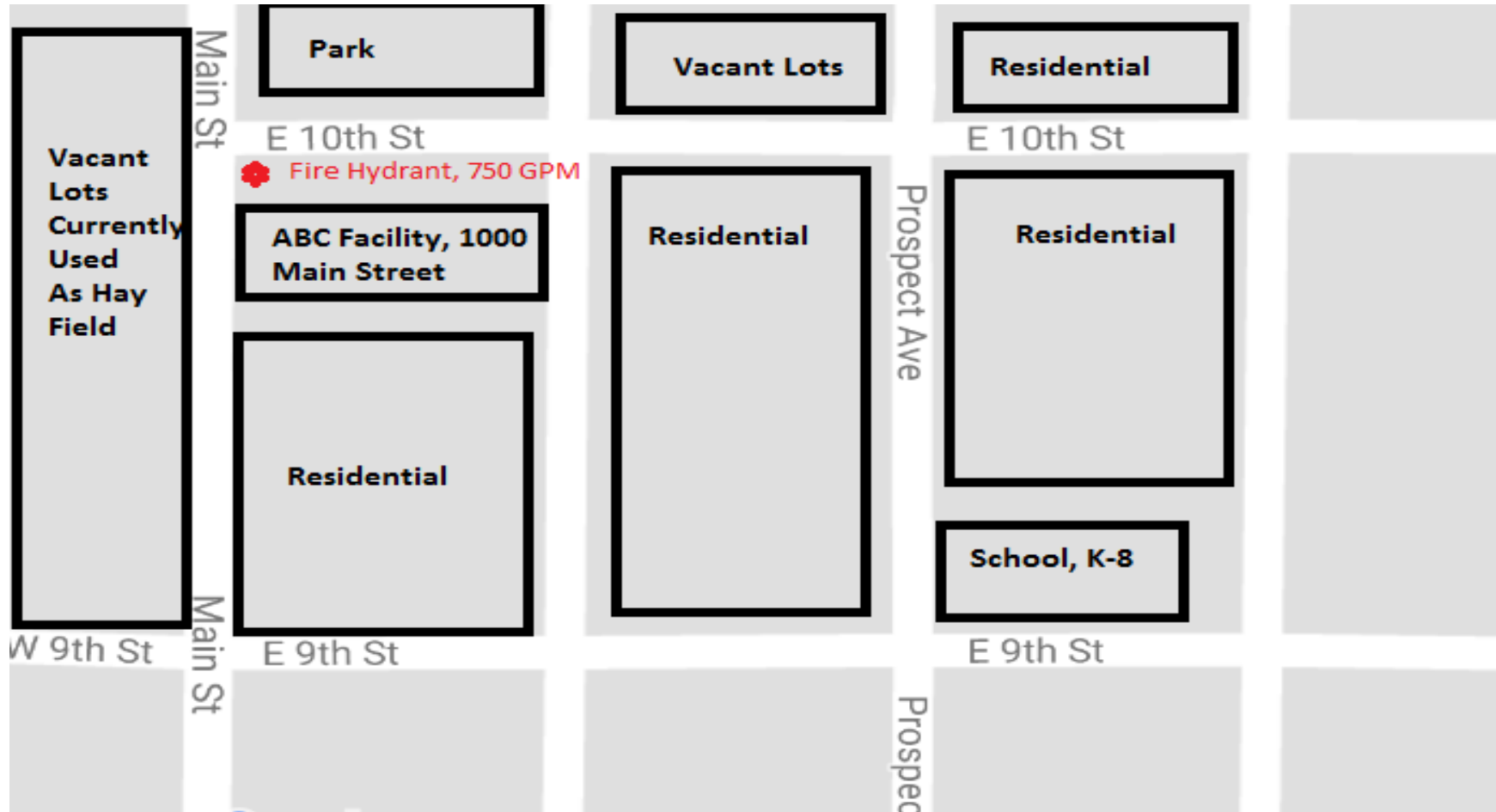
→ Indicates evacuation route out of the building.

Note 1: Hazardous waste (paint related waste) is generated and accumulated inside each of the two paint booths, and is accumulated in the hazardous waste storage area. Amine 4 can be a hazardous waste if it is off-specification and it is generated and accumulated in the SW corner at the Amine 4 tank.

Note 2: Smoke detectors are located throughout the office and main warehouse on the ceiling, in a grid about every 25 feet. Smoke detectors are connected to an automatic sprinkler system.

Quick Reference Guide Example (pg 3)

Street Map



Emergency Preparedness and Planning

Making and Documenting Arrangements with Local Emergency Responders

- The standard requiring generators to make arrangements with local emergency responders is found in the previous regulations in part 265 subpart C (§ 265.37), applicable to both SQGs and LQGs.
- § 262.37(b) stated that when the state or local authorities refused to enter into agreements, it must be documented.
- Under the revisions, generators must document that they have attempted to make arrangements with local emergency responders (or that arrangements were sought but not obtained) and keep the documentation in the facility's operating record
- No specific form or type of documentation is required and additional flexibility is provided regarding where documentation can be retained

(§ 262.16(b)(8)(vi) & § 262.256)

Emergency Preparedness and Planning

- LQGs can eliminate unnecessary employee personal information in the contingency plan (§ 262.261(d))
 - Replacing addresses and phone numbers of employees with an emergency telephone number and, where applicable, a position title, as long as the number is staffed at all times
- SQGs and LQGs may determine the most appropriate locations for emergency equipment, when it is not possible or unsafe to have the equipment located immediately next to the generating equipment (§ 262.16(b)(8)(ii)/ § 262.252)
- Add “direct or unimpeded access” as a meaning for the term “immediate access” in SQG and LQG regulations (§ 262.16(b)(8)(iv)/§ 262.254)
- Stating that SQGs the location relevant emergency response information should be posted is “next to the telephone” (§ 262.16(b)(9)(ii))
- Clarify that SQGs have the option to use contractors to address releases (containment/cleanup) (§ 262.16(b)(9)(iv)(B))
- Large facilities with internal response capabilities may seek a waiver from entering into arrangements with local authorities (§ 262.16(b)(8)(vi)(C)/ § 262.256(c))

Module 5 - Recordkeeping and Reporting

Contents of Module 5

- Recordkeeping
- Reporting
- Site ID Walk Through

Summary of New Recordkeeping Requirements

- New Recordkeeping Requirements
 - Episodic generation
 - VSQG consolidation
 - Tanks
 - Closure – waste accumulation unit(s)
 - 50-foot waiver
 - Arrangements with local authorities

New Recordkeeping Requirements

- Episodic generation
 - Maintain records of episodic event and any approved petitions in operating record for 3 years

- VSQG consolidation at same-company LQG
 - LQG is required to keep records of shipments from the VSQG for 3 years
 - These can be normal business records
 - Must identify the name, site address, and contact information for the VSQG
 - Must include a description of the hazardous waste received, including the quantity and the date the waste was received

New Recordkeeping Requirements (continued)

- Tanks
 - SQGs and LQGs may use logs, monitoring equipment or other records to demonstrate that hazardous waste is either emptied or removed from the tank within 180 or 90 days (SQGs – 262.16(b)(6)(ii)(C) and LQGs – 262.17(a)(5)(ii)(C))
 - Regulations address both batch and continuous flow processes
- Records must be kept on site and readily available for inspections
 - Ideally these records will be in close proximity to where hazardous waste is being accumulated in the tank, or if not practical (i.e., exposure to weather, physically infeasible, etc.) in a control room, or other central location at the facility
- Bottom Line: Methods used to demonstrate that a tank has been emptied must be reasonable and easily discernible.

New Recordkeeping Requirements (continued)

- Closure of waste accumulation unit
 - Maintain information of closed units as part of operating record
- 50-Foot Waiver
 - Maintain approval of waiver as part of operating record
- Arrangements with local authorities
 - Maintain record of arrangements or attempt to make arrangements as part of operating record

Summary of New Reporting Requirements

- New Reporting Requirements
 - SQG Re-notification (Site ID form)
 - LQGs receiving wastes from VSQGs under control of same company (Site ID form & GM form of BR)
 - Episodic generation (Site ID form)
 - Biennial Reporting for Facilities Not Storing (WR form of BR)
 - Closure – facility and/or waste accumulation units (Site ID form)
 - Quick response guide (Summary of contingency plan)

Site ID Form (8700-12)

- The Form has been updated to account for several changes related to notification
- It's on our website here:
- <https://www.epa.gov/hwgenerators/instructions-and-form-hazardous-waste-generators-transporters-and-treatment-storage-and>
- EPA has electronic reporting options available for the 8700-12/Site ID form in states that have opted in to using the electronic system
 - Check with your state to see if reporting electronically is an option

New Reporting Requirements

SQG Re-notification

- § 262.18(d) Re-notification.
 - (1) A small quantity generator must re-notify EPA starting in 2021 and every four years thereafter using EPA Form 8700–12. This re-notification must be submitted by September 1st of each year in which re-notifications are required.
- We expect many states to allow electronic reporting. EPA made the timeframe off-cycle with the Biennial Report to reduce the impact on state programs.
- Note: SQGs located in states with more frequent re-notification should comply with the state's timeframe. The more frequently state-collected data should be transferred into the national RCRA information management system or RCRAInfo by the state on the timetable above.

SQG Re-Notification (continued)

- Previously, SQGs were only required to notify once – when obtaining a RCRA Identification number.
- EPA and many states have outdated information since SQGs may have gone out of business, changed regulatory category, etc.
 - Many notifications occurred over 30 years ago
- Without accurate and up-to-date generator universe information, both EPA and states cannot conduct necessary oversight and program management activities.

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM



1. Reason for Submittal (Select only one.)

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity) |
| <input type="checkbox"/> | Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year) |
| <input type="checkbox"/> | Site was a TSD facility and/or generator of > 1,000 kg of hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations) |
| <input type="checkbox"/> | Notifying that regulated activity is no longer occurring at this Site |
| <input type="checkbox"/> | Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities |
| <input type="checkbox"/> | Submitting a new or revised Part A Form |

**SQG must check
this box to re-
notify**

New Reporting Requirements (continued)

LQGs Receiving Wastes from VSQGs

- LQGs must submit Site ID form:
 1. Notifying EPA/state that they are receiving hazardous waste from VSQGs under the control of same company, and
 2. Identifying in addendum each VSQG they are receiving waste from, including name and address of facility and contact name and telephone number.
- See next slides for how to fill out the Site ID form

LQG Notification for Consolidation of VSQG waste

14. LQG Consolidation of VSQG Hazardous Waste

| | |
|--|--|
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If "Yes", you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste. |
|--|--|

**Check "Y" if LQG
consolidating VSQG waste**

ADDENDUM TO THE SITE IDENTIFICATION FORM:
LQG CONSOLIDATION OF VSQG HAZARDOUS WASTE



ONLY fill out this form if:

- You are an LQG receiving hazardous waste from VSQGs under the control of the same person. Use additional pages if more space is needed.

| VSQG 1 | | |
|--|----------------------------------|--------------------------|
| 1. EPA ID Number (if assigned) 123456 | 2. Name Facility X | |
| 3. Street Address 123 Main St. | | |
| 4. City, Town, or Village Nowheresville | 5. State Someplace | 6. Zip Code 11111 |
| 7. Contact Phone Number 555-555-5555 | 8. Contact Name Mr. Jones | |
| 9. Email Jones.Mr@facilityx.com | | |

New Reporting Requirements (continued)

LQGs Receiving Wastes from VSQGs

- Reporting requirements provide oversight capability on part of EPA/states
 - Allows EPA/States to determine if LQG is complying with rule's provisions and capable of managing additional amounts of hazardous waste
- EPA plans to monitor this program and see if it should be expanded in the future

New Reporting Requirements (continued)

Episodic Generation

- When holding an episodic event, a generator must notify EPA/authorized state that they are doing so at least 30 days before the event (if planned) or within 72 hours (if unplanned)
 - Start and end date of episodic event
 - Reason for the event
 - Types of hazardous waste generated (federal and state waste codes)
 - Estimated amounts of hazardous waste to be generated
 - Emergency contact
 - Emergency phone number

SQG or VSQG Notification of Episodic Generation Event

13. Episodic Generation

| | |
|--|---|
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If "Yes", you must fill out the Addendum for Episodic Generator. |
|--|---|

Check "Y" if VSQG or SQG holding an episodic event

**ADDENDUM TO THE SITE IDENTIFICATION FORM:
EPISODIC GENERATOR**



Episodic Event

Check type of event being held

1. Planned

- Excess chemical inventory removal
- Tank cleanouts
- Short-term construction or demolition
- Equipment maintenance during plant shutdowns
- Other _____

2. Unplanned

- Accidental spills
- Production process upsets
- Product recalls
- "Acts of nature" (Tornado, hurricane, flood, etc.)
- Other _____

3. Emergency Contact Phone

(202) 555-5555

4. Emergency Contact Name

Jane Smith

5. Beginning Date

7/15/19 (mm/dd/yyyy)

6. End Date

9/01/19 (mm/dd/yyyy)

Waste 1

7. Waste Description

Removing old chemicals from a laboratory

8. Estimated Quantity (in pounds)

9. Federal and/or State Hazardous Waste Codes

Insert relevant waste codes

D001

D008

New Reporting Requirements (continued)

Biennial Reporting

- Clarifies in regulation that LQGs must complete and submit BR
- Requires LQGs to provide specific information found in EPA Form 8700–13 A/B rather than citing outdated information previously found at § 262.41 (a)(1)-(8)
 - Agency will issue FR notice, inform key stakeholders and place notice on EPA website if and when it modifies EPA Form 8700–13 A/B.
- Requires in regulation that LQGs identify all of the hazardous wastes they generated throughout the year, not just for months generator was LQG
- Requires LQGs consolidating VSQG waste to identify volumes and types of wastes but with new source code (G51) on GM form
- Requires facilities not storing hazardous wastes prior to recycling to complete BR

Recycler Who Needs to Report

| | |
|---|---|
| United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM |  |
|---|---|

1. Reason for Submittal (Select only one.)

| | |
|-------------------------------------|--|
| <input type="checkbox"/> | Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity) |
| <input checked="" type="checkbox"/> | Submitting as a component of the Hazardous Waste Report for <u>2017</u> (Reporting Year) |
| <input type="checkbox"/> | <input type="checkbox"/> Site was a TSD facility and/or generator of > 1,000 kg of hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations) |
| <input type="checkbox"/> | Notifying that regulated activity is no longer occurring at this Site |
| <input type="checkbox"/> | Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities |
| <input type="checkbox"/> | Submitting a new or revised Part A Form |

Assuming facility has ID #, check this box

Facilities Not Storing HW Prior to Recycling: Changes to the Site ID form as part of BR Submission

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

| | |
|--|---|
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | 6. Recycler of Hazardous Waste |
| <input type="checkbox"/> | a. Recycler who stores prior to recycling |
| <input checked="" type="checkbox"/> | b. Recycler who does not store prior to recycling |

**Check both boxes if you are a
recycler who doesn't store**

New Reporting Requirements (continued)

Closure

- Closure of waste accumulation area – Require LQGs to place notice in their operating record within 30 days after closure identifying location of unit within facility; or meet closure performance standards and notify EPA.
- Closure of facility –
 - Notify EPA or authorized state no later than 30 days prior to closing facility, and
 - Notify EPA or authorized state within 90 days after closing facility that it has complied with closure performance standards or notify if it can't clean close
 - LQG can request extension but must notify EPA or authorized state within 75 days after closing facility

LQG Notification of Closure

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

| | |
|---|---|
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility. |
| A. <input type="checkbox"/> Central Accumulation Area (CAA) <input checked="" type="checkbox"/> Entire Facility | |
| B. Expected closure date: <u>07/04/2019</u> mm/dd/yyyy | |
| C. Requesting new closure date: _____ mm/dd/yyyy | |
| D. Date closed : _____ mm/dd/yyyy | |
| <input type="checkbox"/> 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8) | |
| <input type="checkbox"/> 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8) | |

If "yes," select appropriate option for A.

For B, C, and D, only fill out **ONE** depending on your closure stage

New Reporting Requirements (continued)

Emergency Response

As part of regulations, requires LQGs to submit Contingency Plan Quick Reference Guide to local emergency responders

- **Contents of the Quick Reference Guide (eight elements)**
 - Types/names of hazardous waste and associated hazards
 - Estimated maximum amounts of hazardous wastes
 - Hazardous wastes requiring unique/special treatment
 - Map showing where hazardous wastes are generated, accumulated or treated at the facility
 - Map of facility and surroundings to identify routes of access and evacuation
 - Location of water supply
 - Identification of on-site notification systems
 - Name of emergency coordinator(s) or listed staffed position(s) and 7/24-hour emergency telephone number(s)

Module 6 - Implementation and State Adoption

Contents of Module 6

- Rule Process and Schedule
- State Adoption
- Stringency of the Final Rule
- EPA Resources
- Contacts

Rule Process & Schedule

- Rule signed on October 28, 2016
- Publication in Federal Register—November 28, 2016 (81 FR 85732)
- Effective Date – 6 months from publication—May 30, 2017
- Rule went into effect in Iowa, Alaska, most territories, and tribal lands on the effective date
 - EPA runs the RCRA program in those states, most territories, and tribal lands

State Adoption

- Authorized states run the RCRA program in their state and thus, go through the state adoption & authorization process for this RCRA rule
 - Authorized states have to pick up the more stringent provisions, typically by July 1, 2018 (or July 1, 2019 if state law change is needed)
 - Authorized states can choose to pick up the less stringent provisions and those provisions that are considered equally stringent

Stringency of Final Rule

- More stringent provisions:
 - SQG re-notification
 - SAAs subject to incompatibility and emergency preparedness & prevention requirements
 - Identifying hazards of wastes being accumulated on labels and RCRA waste codes added prior to shipment
 - Notification of closure
 - Closure as a landfill for LQGs accumulating hazardous wastes in containers that cannot meet closure performance standards
 - Biennial reporting for whole year, not just months the generator is an LQG
 - Biennial reporting for recyclers who don't store prior to recycling
 - Quick Reference guide for contingency plans
- Less stringent provisions:
 - VSQG consolidation
 - Episodic generation
 - Waiver from 50-foot rule

EPA resources

Main generator website: <https://www.epa.gov/hwgenerators>

Generator Improvements Rule website: <https://www.epa.gov/hwgenerators/final-rule-hazardous-waste-generator-improvements>

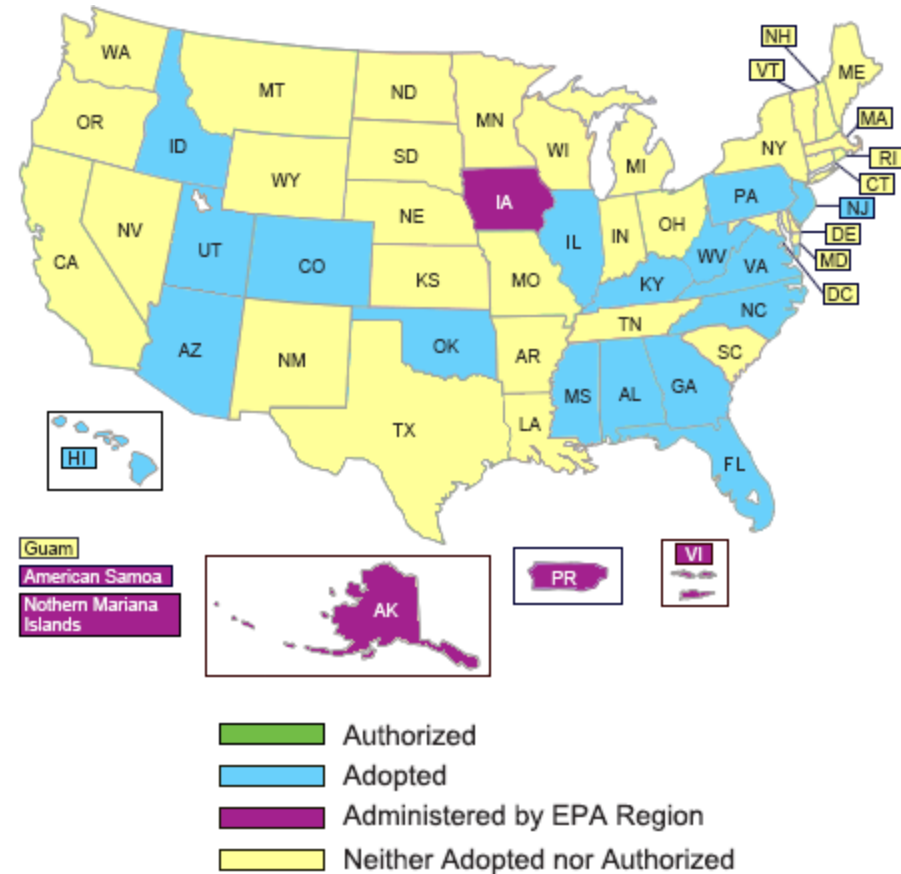
Link to the map of states that have adopted the new rule:

<https://www.epa.gov/hwgenerators/where-hazardous-waste-generator-improvements-rule-effect>

FAQs for implementing the new rule: <https://www.epa.gov/hwgenerators/frequent-questions-about-implementing-hazardous-waste-generator-improvements-final-rule>

We also plan to update existing guidance and resources as much as possible with new terms and citations

Where the HW Generator Improvements Rule is in Effect



What resources would be helpful

- What new resources would you like to see?
- What materials on our website do you use the most and want us to update with new terms and citations?
- Email us your suggestions!

Points of Contact

- Kathy Lett
 - 703-605-0761
 - Lett.Kathy@epa.gov

- Mary Beth Sheridan
 - 703-308-4941
 - Sheridan.MaryBeth@epa.gov

- Brian Knieser
 - 703-347-8769
 - Knieser.Brian@epa.gov