

RCRA REQUIREMENTS THE QUICK VERSION

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Weblinks

▶ **General rule information:**

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

▶ **Rule as posted in the Federal Register:**

<https://www.federalregister.gov/documents/2016/11/28/2016-27429/hazardous-waste-generator-improvements-rule>

Weblinks

► **Fact sheet:**

<https://www.epa.gov/hwgenerators/fact-sheet-about-hazardous-waste-generator-improvements-final-rule>

► **Frequently Asked Questions:**

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

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Waste Determination

40 C.F.R. 262.11 –
Already discussed

Determining Generator Category

40 C.F.R. 262.13 –
Already discussed



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VSQGs

▶ 40 C.F.R. 262.14

▶ Was CESQG

Conditional Exemption

Still a conditional exemption

Now Very Small Quantity Generator

Violate rules and lose exemption

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Satellite Accumulation
40 C.F.R. 262.15 – Already
discussed in Waste Management

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Preparedness Prevention - Satellite Areas
SQG's must meet Preparedness
and Prevention at 262.16(b)(8)
and Emergency Procedures at
262.16(b)(9).

- LQG's must meet the
Preparedness, Prevention and
Emergency Procedures at subpart
M of 262

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Preparedness and Prevention - SQGs

262.16(b)(8)(i): Minimizing possibility of a fire, explosion, or any release

262.16(b)(8)(ii): Equipping facility with emergency equipment

262.16(b)(8)(iii): Testing and maintaining emergency equipment

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Preparedness and Prevention – SQGs

- ▶ **262.16(b)(8)(iv): Immediate access to communications or alarm system**
- ▶ **262.16(b)(8)(v): Aisle space**
- ▶ **262.16(b)(8)(vi): Arrangements with PD, FD, Contractors, Hospitals etc.**

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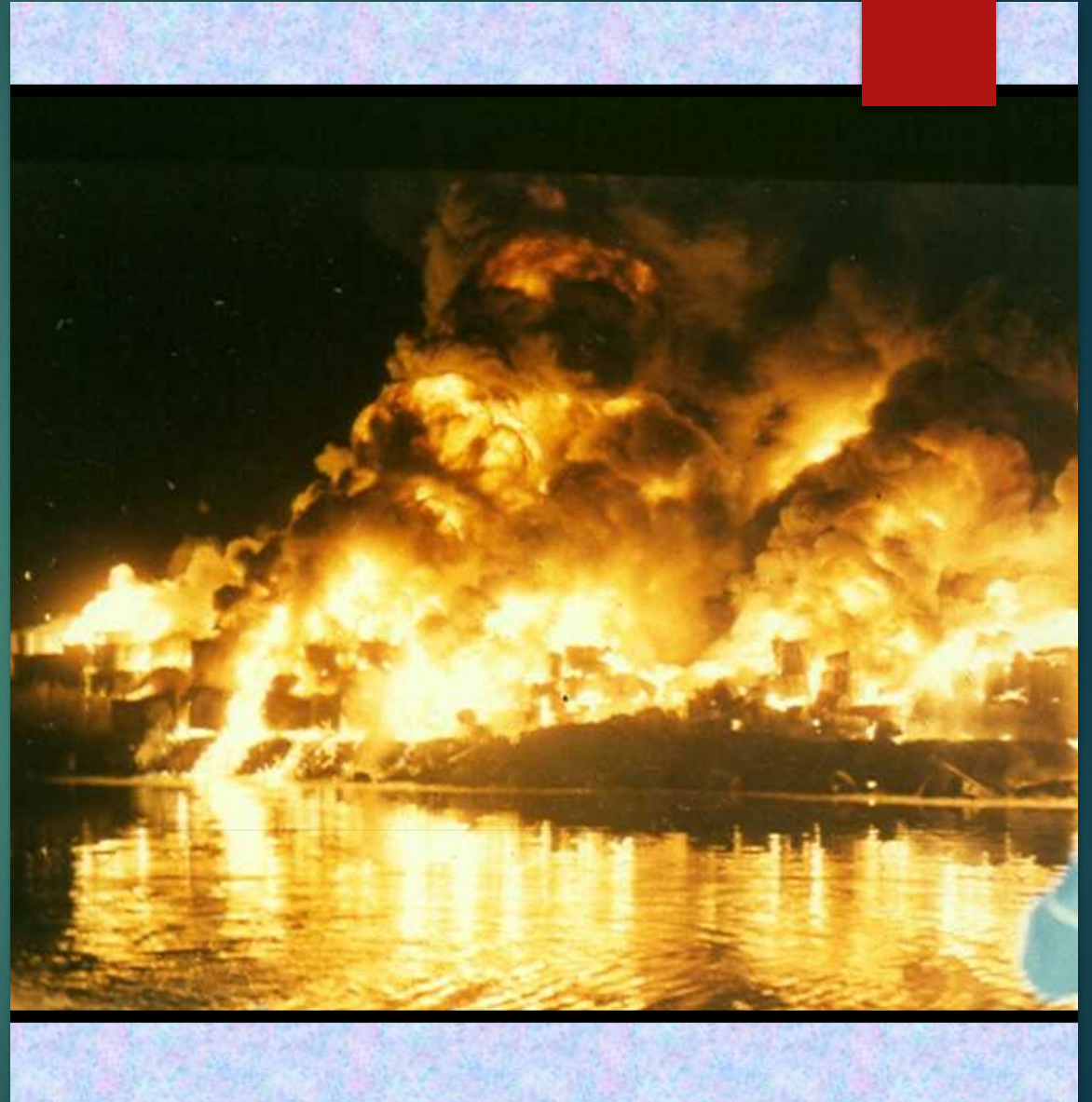
Emergency Procedures – SQGs

- ▶ **262.16(b)(9)(i): Emergency coordinator**
- ▶ **262.16(b)(9)(ii): Post emergency information**
- ▶ **262.16(b)(9)(iii): Train employees on waste handling/emergency procedures**
- ▶ **262.16(b)(9)(iv): Respond to emergencies**

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Subpart M – P&P at LQGs

- ▶ **262.251: Minimizing possibility of a fire, explosion, or any release**
- ▶ **262.252: Equipping facility with emergency equipment**
- ▶ **262.253: Testing and maintaining emergency equipment**



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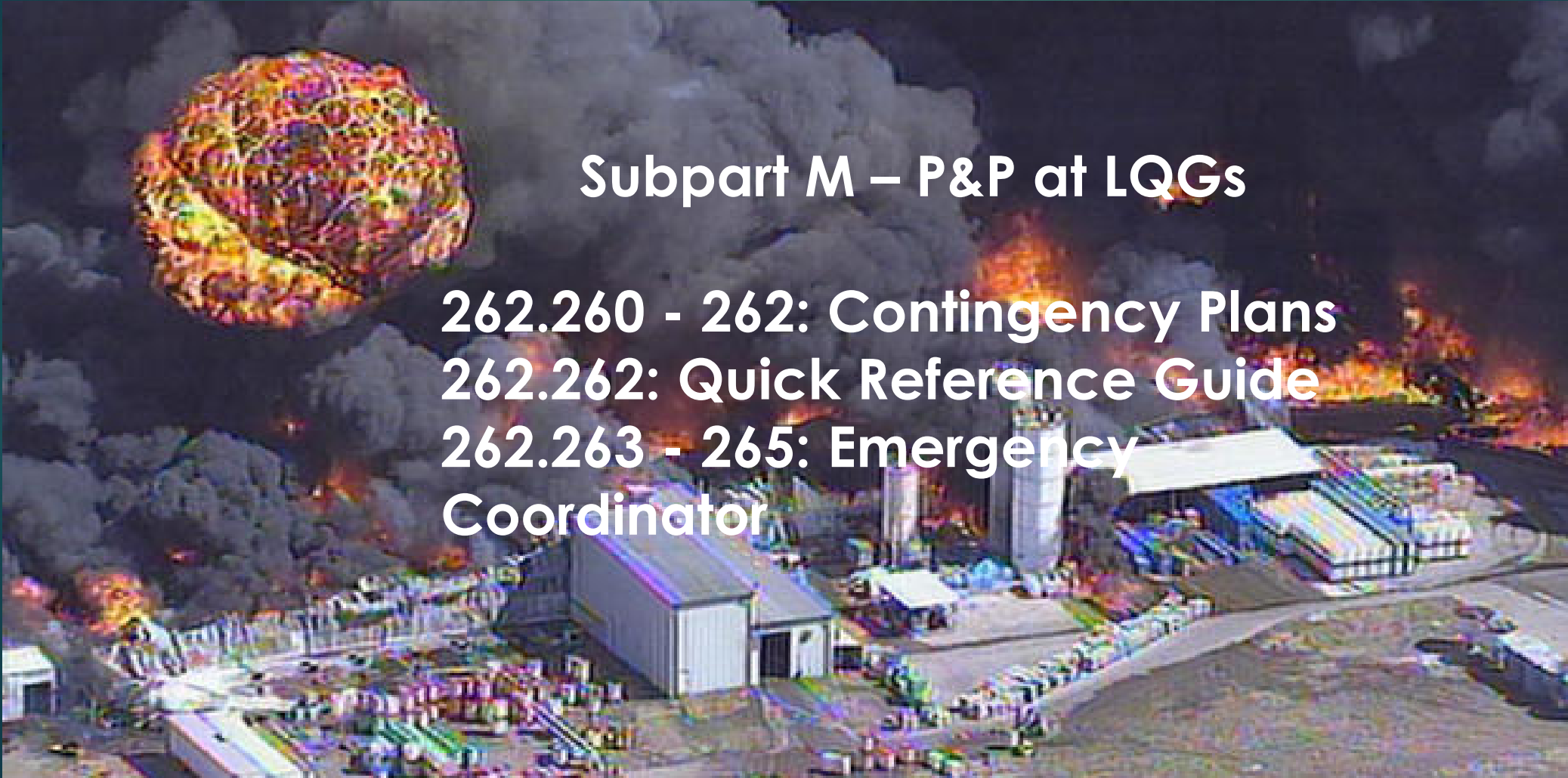
Subpart M – P&P at LQGs

- ▶ **262.254: Access to communications or alarm system**
- ▶ **262.255: Aisle space**
- ▶ **262.256: Arrangements with PD, FD, Contractors, Hospitals**

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Subpart M – P&P at LQGs

262.260 - 262: Contingency Plans
262.262: Quick Reference Guide
262.263 - 265: Emergency
Coordinator



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General SQG Requirements

- ▶ 262.16(b)(2): Containers
- ▶ 262.16(b)(3): Tanks
- ▶ 262.16(b)(4): Drip Pads
- ▶ 262.16(b)(5): Containment Buildings
- ▶ 262.16(b)(6): Labeling/Marking
- ▶ 262.16(b)(8): P&P
- ▶ 262.16(b)(9): Emergency Procedures

RCRA REQUIREMENTS THE QUICK VERSION

General LQG Requirements

- ▶ 262.17(a)(1): Containers
- ▶ 265 Subpart J: Tanks
262.17(a)(3): Drip Pads
- ▶ 262.17(a)(4): Containment Buildings
- ▶ 262.17(a)(5): Labeling/Marking

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General LQG Requirements

262.17(a)(7): Personnel Training

262.17(a)(8): Closure

262.17(c): F006 Waste

262.17(f) and (g): Waste from
VSQGs

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EPA ID Numbers and Renotification

262.18(a) – (e)

**262.18(a): Generator must have
EPA ID Number**

**262.18(c): Only offer hazardous
waste to Transporters/TSDs with
EPA ID Number**

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SQG Renotification

262.18(d)1

SQGs must re-notify starting in
2021

Every four years thereafter

Use EPA Form 8700-12

By September 1st of each year
when re-notification required

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LQG Renotification

262.18(d)2

LQGs must re-notify by March 1 of each even-numbered

Use EPA Form 8700-12

May submit re-notification as part of Biennial Report

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Episodic Events

- ▶ 262.232(a) SQG Requirements
- ▶ 262.232(b) LQG Requirements