

HIGHLIGHTS OF THE GENERATOR IMPROVEMENTS RULE

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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>

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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 – Will be discussed later

Determining Generator Category

40 C.F.R. 262.13 – Will be discussed later

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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 – Will be discussed later in container 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**

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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**

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Subpart M

- **262.251 – 256 P&P**
- **262.260 – 262 Contingency Plan**
- **262.262 Quick Reference Guide**
- **262.263 – 265 Emergency Coordinator**

