Hazardous Waste Generator Improvements Rule

KY AWMA Environmental Practitioners Workshop
April 27, 2018

Christa Oerly Russell
Senior Consultant
Agenda

> Introduction to Hazardous Waste (HW)
  ♦ Overview of HW Generator Categories
> HW Generator Improvements Rule
> Case Studies of HW Regulatory Update
Overview of HW Generator
Categories
## HW Generator Categories

<table>
<thead>
<tr>
<th>Generator Category</th>
<th>Monthly HW Generation Limit</th>
<th>Total HW On-site Accumulation Limit</th>
<th>HW On-site Accum. Time Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>VSQG (formerly called CESQG)</td>
<td>HW ≤ 100 kg (220 lb) and Acute HW ≤ 1 kg (2.2 lb) and Acute residue ≤ 100 kg</td>
<td>≤ 1,000 kg (2,200 lb)</td>
<td>N/A*</td>
</tr>
<tr>
<td>SQG</td>
<td>100 kg &lt; HW &lt; 1,000 kg and Acute HW ≤ 1 kg and Acute residue ≤ 100 kg</td>
<td>≤ 6,000 kg (13,000 lb)</td>
<td>180 days maximum without permit</td>
</tr>
<tr>
<td>LQG</td>
<td>HW ≥ 1,000 kg or Acute HW &gt; 1 kg or Acute residue &gt; 100 kg</td>
<td>N/A</td>
<td>90 days maximum without permit</td>
</tr>
</tbody>
</table>

*Although not subject to standard on-site accumulation time limits:

- If a VSQG accumulates > 1 kg acute HW (or > 100 kg of cleanup residue), then all quantities of that acute HW waste must be managed according to requirements for LQGs codified in §262.17(a)-(g), including the 90-day limit.
- If a VSQG accumulates > 1,000 kg non-acute HW, then that waste must be managed according to requirements for SQGs codified in §262.16(b)(2)-(f), including the 180-day limit.
Requirements by Category (1/2)

<table>
<thead>
<tr>
<th>Generator Category</th>
<th>ID all HW Streams</th>
<th>Manifest</th>
<th>Pre-Transport</th>
<th>Preparedness &amp; Prevention</th>
<th>Land Disposal Restrictions</th>
</tr>
</thead>
<tbody>
<tr>
<td>VSQG</td>
<td>✓</td>
<td>*</td>
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<tr>
<td>SQG</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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<tr>
<td>LQG</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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</table>

* Although not subject to HW manifest requirements of 40 CFR 262 Subpart B, VSQGs must ensure that hazardous waste is delivered to a person or facility who is authorized to manage it.
### Requirements by Category (2/2)

<table>
<thead>
<tr>
<th>Generator Category</th>
<th>Manage HW in Approved Tanks, Containers, etc.</th>
<th>RCRA Section 3010 Notification</th>
<th>Emergency Response Coordinator Available</th>
<th>Contingency Plan</th>
<th>Biennial HW Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>VSQG</td>
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</tr>
<tr>
<td>SQG</td>
<td>✓ *</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>LQG</td>
<td>✓ **</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

* SQGs must manage HW in accordance with §262.16, which references the interim standards in 40 CFR 265.17(b) for ignitable, reactive, and incompatible wastes.

** LQGs must manage HW in accordance with §262.17, which references the interim standards in 40 CFR 265 for process vents, equipment leaks, tanks, surface impoundments, containers, etc.
Hazardous Waste Generator Improvements Rule
HazWaste Generator Improvements

Rule

> Long-awaited overhaul of the hazardous waste generator rules
> Final Rule: November 28, 2016
  ❖ 81 FR 85732
> Affected regulations
  ❖ 40 CFR 257-258, 260-268, 270-271, 273, 279
  ❖ >60 changes to the regulations, plus about 30 technical corrections
> Affected entities:
  ❖ All hazardous waste generators (CESQG, SQG, LQG), TSDFs, Transporters
  ❖ All industry sectors, facility types, locations
Major Provisions of the Rule

- Reorganization
- Episodic Generation
- Consolidation of CESQG (VSQG) Waste at LQGs
- Ignitable and Reactive Waste Waiver
- Waste Determination Expectations
- Emergency Preparedness and Prevention
- Labeling
- Satellite Accumulation Provisions
- Closure Requirements
- Additional Changes and Clarifications
## Reorganized Rule Structure

<table>
<thead>
<tr>
<th>Provision</th>
<th>Original Citation in 40 CFR</th>
<th>New Generator Citation in 40 CFR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Definition of Generator Categories</td>
<td>§260.10, 261.5, &amp; 262.34</td>
<td>§260.10</td>
</tr>
<tr>
<td>Hazardous Waste Determination and Recordkeeping</td>
<td>§262.11 and 262.40(c)</td>
<td>§262.11</td>
</tr>
<tr>
<td>Generator Category Determination</td>
<td>§261.5(c)-(e)</td>
<td>§262.13</td>
</tr>
<tr>
<td>VSQG Provisions</td>
<td>§261.5(a), (b), (f)-(j), and 258.28</td>
<td>§262.14</td>
</tr>
<tr>
<td>Satellite Accumulation Area Provisions</td>
<td>§262.34(c), 265.171, 265.172, and 265.173(a)</td>
<td>§262.15</td>
</tr>
<tr>
<td>SQG Provisions</td>
<td>§262.34(d)-(f) and 268</td>
<td>§262.16</td>
</tr>
<tr>
<td>LQG Provisions</td>
<td>§262.34(a), (b), (g)-(i), (m), and 268</td>
<td>§262.17</td>
</tr>
<tr>
<td>USEPA Identification Numbers</td>
<td>§262.12</td>
<td>§262.18</td>
</tr>
<tr>
<td>Landfill Ban for Liquids</td>
<td>§258.28</td>
<td>§262.35</td>
</tr>
</tbody>
</table>
Various “Minor” Changes

> “VSQG” (Very Small Quantity Generator) replaces “CESQG”

> “Central Accumulation Area” defined
  - Storage vs. central accumulation
  - Central vs. satellite accumulation

> Miscellaneous “improvements”
  - Corrections, Clarifications
  - New definitions
  - Deleting outdated and obsolete provisions

> Cumulative effect of many relatively minor changes = Potentially significant effort for generators to come into initial compliance
“Less Stringent” Provisions

- Episodic generators
- VSQG consolidation option
- 50-foot waiver for ignitable / reactive waste

HOWEVER!
- Not in effect until adopted in your state
- States are NOT required to adopt “less stringent” provisions
Episodic Generation

> **Episodic event**
> - Planned or unplanned activity, that does not normally occur during generator operations, resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator’s usual category.

> **Planned episodic event**
> - Planned and prepared for:
>   - e.g., regular maintenance, tank cleanouts, short-term projects, and removal of excess chemical inventory

> **Unplanned episodic event**
> - Unplanned and reasonably did not expect to occur
>   - e.g., production process upsets, product recalls, accidental spills, “acts of nature” such as tornado, hurricane, flood
Episodic Generators

- Valuable option for facilities with occasional temporary surge in hazardous waste generation
- 40 CFR 262 Subpart L (262.230-233)
- Generator can remain at existing (VSQG, SQG) category during episodic generation, with the following conditions:
  - Notify Agency at least 30-days in advance
    - (or within 72 hours for unplanned episode)
  - Complete the episodic event within 60-days
    - No extensions
  - Only one planned episodic event per year
    - Can petition for second (unplanned) event
    - No more than 2 episodic events/year
**ADDENDUM TO THE SITE IDENTIFICATION FORM: EPISODIC GENERATOR**

**ONLY fill out this form if:**
- You are an SDG or VSG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 90 days, that moves the generator to a higher generator category pursuant to 40 CFR 262 Subpart L.

Note: Only one planned and one unplanned episodic event are allowed within one year; otherwise, you must follow the requirements of the higher generator category. Use additional pages if more space is needed.

<table>
<thead>
<tr>
<th>Episodic Event</th>
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</thead>
<tbody>
<tr>
<td>1. Planned</td>
<td>2. Unplanned</td>
</tr>
<tr>
<td>– Excess chemical inventory removal</td>
<td>– Accidental spills</td>
</tr>
<tr>
<td>– Tank cleanouts</td>
<td>– Production process upsets</td>
</tr>
<tr>
<td>– Short-term construction or demolition</td>
<td>– Product recalls</td>
</tr>
<tr>
<td>– Equipment maintenance during plant shutdowns</td>
<td>– “Acts of nature” (Tornado, hurricane, flood, etc.)</td>
</tr>
<tr>
<td>– Other</td>
<td>– Other</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Emergency Contact Phone:</th>
<th>4. Emergency Contact Name:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>5. Beginning Date</th>
<th>6. End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>(mm/dd/yyyy)</td>
<td>(mm/dd/yyyy)</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Waste 1</th>
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<th>Waste 2</th>
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<th>Waste 3</th>
<th></th>
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<tbody>
<tr>
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</tr>
</tbody>
</table>
Episodic Generators, cont.

- **VSQG (CESQG)** must also comply with SQG waste management provisions and maintain records
  - Obtain USEPA ID Number
  - Use hazardous waste manifest and transporter to ship to RCRA TSDF or recycler
  - Manage in a way that minimizes potential for accident or release
  - Label episodic waste containers
    - “Episodic Hazardous Waste”
    - Identify hazards of contents
  - Identify an emergency coordinator at the generator facility
  - Maintain records
Episodic Generators, cont.

> **SQG** must comply with existing SQG regulations
  
  - Label episodic waste containers
    - “Episodic Hazardous Waste”
    - Identify hazards of contents
  
  - Use hazardous waste manifest and transporter to ship to RCRA TSDF or recycler
  
  - Maintain records of episodic event

> **CONDITIONAL!** All conditions must be met to retain the episodic generation conditional management benefit

  - If one or more conditions is not met, automatically revert to higher generator category
VSQG (CESQG) Consolidation Option

> Allows company to consolidate VSQG wastes at their own LQG facility
  ❖ 40 CFR 262.14(a)(5)(viii)

> Benefits companies with multiple locations
  ❖ At least one location is LQG
  ❖ At least one location is VSQG
  ❖ LQG does not need to be a permitted TSDF
  ❖ Must be under control of the same “person,” as defined under RCRA
  ❖ “Control” is the power to direct policies at the facility

> NOT APPLICABLE to SQGs
VSQG Consolidation Option

VSQG Responsibilities:
- Mark and label containers as “Hazardous Waste”
- Indicate hazards of the contents
- Ship/transport in accordance with applicable regulations
  - DOT compliance if shipped on public roadway
  - No hazardous waste manifest required and hazardous waste transporters do not have to be used
VSQG Consolidation Option

> LQG Responsibilities (found at 262.17(f))
  ❖ Notification (via Site ID Form) of participation in the program (including info for all VSQGs participating)
    ♦ USEPA Form 8700-12 recently revised
  ❖ Recordkeeping for each shipment
    ♦ Maintain for 3 years
  ❖ Manage consolidated waste as LQG hazardous waste
    ♦ Start date of accumulation = date received from VSQG
  ❖ Include in Biennial (Annual) Report
    ♦ Will include new source code
ADDENDUM TO THE SITE IDENTIFICATION FORM:
LOQ CONSOLIDATION OF VSQG HAZARDOUS WASTE

ONLY fill out this form if:
- You are an LOQ receiving hazardous waste from VSQGs under the control of the same person. Use additional pages if more space is needed.

<table>
<thead>
<tr>
<th>VSQG 1</th>
<th>VSQG 2</th>
<th>VSQG 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. EPA ID Number: [if assigned]</td>
<td>1. EPA ID Number: [if assigned]</td>
<td>1. EPA ID Number: [if assigned]</td>
</tr>
<tr>
<td>2. Name</td>
<td>2. Name</td>
<td>2. Name</td>
</tr>
<tr>
<td>3. Street Address</td>
<td>3. Street Address</td>
<td>3. Street Address</td>
</tr>
<tr>
<td>7. Contact Phone Number</td>
<td>8. Contact Name</td>
<td>8. Contact Name</td>
</tr>
<tr>
<td>9. Email</td>
<td>9. Email</td>
<td>9. Email</td>
</tr>
</tbody>
</table>

EPA Form 8700-12, 8700-13 A/B, 8700-23
Ignitable and Reactive Wastes

> 50-foot waiver
  - Benefits facilities with narrow or odd-shaped properties, or with limited space for hazardous waste accumulation
  - Current rule
    ♦ Ignitable and reactive wastes are prohibited from storage within 50-feet of the property line
  - New allowance
    ♦ Can request site-specific waiver from the local fire authority if unable to meet the 50-foot restriction
    ♦ Written waiver required
    ♦ Agency delegates responsibility for waiver to local fire “authority having jurisdiction”
Equally or More Stringent Provisions

- States must adopt any provision which is more stringent than the previous version of the regulations.
- States are not required to adopt any provisions which are neither more nor less stringent:
  - Rule reorganization
  - Defining central accumulation area and generator categories
  - Mixing a non-hazardous waste with a hazardous waste
  - Generators prohibited from sending hazardous liquids to landfills
  - Replacing the list of specific data elements with a requirement to complete and submit all data elements in the Biennial Report
  - Deleting Performance Track and University Laboratories XL rules
  - Technical corrections and conforming changes to various parts of the RCRA regulations
Waste Determinations

- Must accurately document hazardous waste determinations (§262.11(f))
  - Applies to SQGs and LQGs
  - Applies at point of generation - before diluted, treated, mixed, or otherwise altered
  - Does not apply to exempted wastes (although separate recordkeeping may be required)
  - Does not specifically apply to non-hazardous wastes (although recommended as a best management practice)

- Using knowledge to determine waste characteristics
  - Moves from 262.11(c)(2) to 262.11(d)(2)
  - Lists types of knowledge previously accepted by USEPA
  - Specifically allows alternative tests as part of knowledge
LQG Contingency Plans

> LQG Contingency Plans must have a “quick reference guide” with most critical information (262.261(d))

  ❖ Contents of “quick reference guide”
    ♦ 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)

  ❖ Submit with first Contingency Plan or with first revision following effective date of the rule

> Emergency Coordinator contact information no longer required to include home phone number and home address
Emergency Preparedness & Planning

- Arrangements with Local Emergency Responders
  - Must document attempts to make arrangements with responders
    - Whether or not successful arrangements were made
    - Regulation is flexible on the acceptable types of documentation and on the location where that documentation is retained
    - Waiver option for facilities with on-site response capabilities

- Preparedness and Prevention provisions have been relocated and clarified
  - What emergency equipment is required, and where
  - Must address all areas where hazardous waste is generated and/or managed
  - LQG Information at 40 CFR 262 Subpart M
  - SQG Information at 40 CFR 262.16(b)(8)
Marking/Labeling Requirements

> Applies to all SQGs, LQGs, Transporters

> Label must indicate

  ❖ The words “Hazardous Waste”
  ❖ Identification of hazards NEW
    ♦ Choice of established methods: DOT, OSHA, NFPA, ...
  ❖ Add all waste codes (prior to shipment) NEW
    ♦ May use recognized electronic option
      – e.g., bar codes
    ♦ Exception for lab packs
  ❖ Accumulation start date

> For vessels that can’t be labeled (e.g., some tanks, drip pads, containment buildings)

  ❖ Info can be in records or logs kept at or near the location of the vessel
Satellite Accumulation Provisions

- Satellite accumulation area regulations for SQG and LQG (New section at 40 CFR 262.15)
- Containerized wastes must be compatible with each other and container itself, while in satellite accumulation
- Three-day requirement to move containers from satellite accumulation means three calendar days
- Certain containers in SAA allowed to remain open under very limited circumstances
  - When necessary for safe operations - EXTREMELY limited exception
- Marking and labeling consistent with central accumulation areas
  - Except date of accumulation - not required until full or closed and removed
- Reactive waste satellite accumulation away from the point of generation - no longer allowed
Closure

> Closure of all generator central accumulation units must meet closure performance standards (i.e. “clean close”)
  > Existing LQG requirement extended to container accumulation units
  > Can defer (with appropriate notice) until full facility closure
> Closure requirements for LQG Container Accumulation Areas that cannot clean close
  > Must close as landfill
  > Place notice in operating record within 30-days after closing a unit within a facility that cannot meet closure performance standards (or notify Agency that closure performance standards have been met)
  > Notify Agency no later than 30-days prior to closing a facility
  > Notify Agency within 90-days after closure of a facility that cannot clean close
> Note that there are separate provisions for closure of a HW unit such as taking a HW tank, within a larger HW tank farm, out of service or when replacing a HW tank.
Other Major Provisions of the Rule

- Notifications and recordkeeping
  - SQGs required to re-notify every 4 years
    - First report: September 1, 2021 (Federal Rule) KY still requires annual notification. However, they have adopted the Federal form as well as a KY addendum form.
  - Biennial report rules updated
- LQG Training can use computer-based tools
  - Keep in mind that packaged on-line training doesn’t address the site-specific training requirements
- Method for determining accumulation time in batch and continuous flow tanks
- Methods for determining generator category
  - Mixtures of solid and hazardous wastes
  - Mixtures of acute and non-acute hazardous wastes
- Numerous other changes and clarifications
United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal [Select only one.]

- [ ] Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (includes ISM activity)
- [ ] Submitting as a component of the Hazardous Waste Report for __________ (Reporting Year)
- [ ] Site was a TSDF 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 LGIS regulations)
- [ ] Notifying that regulated activity is no longer occurring at this Site
- [ ] Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
- [ ] Submitting a new or revised Form A Form

2. Site EPA ID Number


3. Site Name


4. Site Location Address

<table>
<thead>
<tr>
<th>Street Address</th>
<th>City, Town, or Village</th>
<th>County</th>
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<tbody>
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<table>
<thead>
<tr>
<th>State</th>
<th>Country</th>
<th>Zip Code</th>
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</table>

5. Site Mailing Address

<table>
<thead>
<tr>
<th>Street Address</th>
<th>Same as Location Address</th>
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6. Site Land Type

- [ ] Private
- [ ] County
- [ ] District
- [ ] Federal
- [ ] Tribal
- [ ] Municipal
- [ ] State
- [ ] Other

7. North American Industry Classification System (NAICS) Code(s) for the Site [at least 5-digit codes]

   A. (Primary) [ ]
   B. [ ]
   C. [ ]
   D. [ ]
“Independent Requirements” vs. “Condition for Exemption”

> 40 CFR 262.1 defines “independent requirement” and “condition for exemption”
> 40 CFR 262.10(a) explains significance of those distinctions
> This clarifies long-standing USEPA policy:
  > Violation of an independent requirement is subject to traditional enforcement paths (NOV→penalty→return to compliance)
  > Noncompliance with an optional exemption condition results in “full regulation” as per the underlying independent requirements

"...And then I found out that I was out of compliance!"
“Independent Requirements” vs. “Condition for Exemption”

Example: Fred’s Fabulous Little Chemical Company, an SQG, has a spill and notifies that they will be using the episodic generator provisions

- Fred neglects to arrange for shipment of the episodic generated waste, and it sits at the facility for 100-days before finally being shipped off-site
- At day 61, the episodic generator condition (remove within 60-days) has been violated, so Fred’s Fabulous Little Chemical Company reverts to being a LQG, subject to full LQG regulation
- At day 91, the LQG accumulation timeframe (90-days) has also been exceeded, so the facility reverts to being an unpermitted hazardous waste storage facility, subject to full TSDF regulation

- NOTE: Most agencies will exercise “enforcement discretion” unless the situation is recurrent or poses severe risk
Status and Implementation

- Final Rule published November 28, 2016
  - Effective date 6 months after final rule: May 30, 2017
- State Implementation
  - Authorized states must adopt all provisions more stringent than current state regulations
  - 1-year implementation schedule (July 1, 2018)
  - 2-year implementation if statutory change required (July 1, 2019)
  - State effective dates could range to late 2019
- Kentucky hazardous waste regulations codified under 401 KAR 39
  - EPA delegated oversight of hazardous waste programs in Kentucky to the Department for Environmental Protection’s Division of Waste Management
  - The updated federal rules were incorporated into Kentucky’s regulations on December 7, 2017
Implications of the Rule?

> So many changes = numerous points of compliance risk
  ♦ Easy enforcement targets
    ♦ SQG quadrennial re-notifications
    ♦ Waste determination documentation
    ♦ LQG Contingency Plans
    ♦ Waste labeling

> Limited immediate impact in most states, until the rules are adopted

> Expect increasing differences between state programs
  ♦ Generators be aware of state-specific requirements
  ♦ For interstate transport, be aware of state-to-state differences
    ♦ Some states are immediately adopting/initiating certain provisions, before adopting the full rule

> Focus on new requirements may highlight historic compliance weaknesses at some facilities
Case Studies of Revised Rule
Situation: A VSQG of hazardous waste is planning to clean out its laboratory. Typically, the site generates ~50 kg/month of hazardous waste. Designating the laboratory chemicals destined for disposal as wastes will increase its monthly hazardous waste total to ~150 kg
Episodic Generation Case (2/5)

> Under previous rule, this would have triggered the site’s re-designation as a SQG.

> Under revised rule, 40 CFR 262 Subpart L establishes a way to maintain VSQG status:
  - Notify agency at least 30 days in advance
  - Ship waste off-site within 60 days of start of episodic event (no extensions)
  - Limit to one planned event per year (up to one unplanned event also allowed)
Episodic Generation Case (3/5)

> 40 CFR 262 Subpart L (cont.):

- Manage wastes in accordance with SQG requirements, including but not limited to:
  - Obtain EPA ID number
  - Satisfy container/tank requirements:
    - Label containers/tanks with “Episodic Hazardous Waste”, indication of hazards, and date episodic event began
    - Keep inventory logs/records for tanks
    - Implement procedures to prevent tank overflow
    - Inspect tanks once each operating day
    - Containers must be in good condition and compatible with waste
    - Containers must be closed, except when adding/removing waste
  - Manage wastes to minimize fire, explosion, or release
  - Comply with HW manifest provisions
  - Maintain required records for 3 years
Episodic Generation Case (4/5)

> What did we forget to take into account?
Episodic Generation Case (4/5)

> Verify that none of the lab materials are Acute HW with a $\leq 1\ kg$ limit

> This could trip LQG status, since there is no SQG status for Acute HW
VSQG Consolidation Case (1/4)

> **Situation:** A company has five (5) facilities classified as VSQGs of hazardous waste. These sites each generate buckets of liquid waste on a regular basis, which may not be sent to the landfill. This leads to costly disposal arrangements for a site that would not otherwise need to use a HW disposal facility. The company also operates a LQG in the same area.
Under previous rule, this liquid waste could not be sent to a LQG under the control of the same company.

Under revised rule, this waste can be consolidated at the LQG facility:

- The LQG does not need to be a permitted TSDF
- No manifest required
- No requirement to use a HW transporter
- VSQG must mark and label the containers as HW and indicate the specific hazards
- Must transport the wastes in accordance with applicable DOT regulations if shipped on a public roadway
VSQG Consolidation Case (3/4)

> What questions did we forget to ask here?
VSQG Consolidation Case (4/4)

➢ Are all of the VSQGs in the same state as the LQG?
➢ Why does that matter?
   ❖ Not all states have adopted the Generator Improvements Rule, and states are not required to adopt the “less stringent” provisions. Both VSQG and LQG states must have adopted these provisions.
Episodic Generation and VSQG Consolidation

> Question: Can a VSQG generate waste under the “Episodic” generation provisions and then send it to a LQG under the “Consolidation” provisions?

> No, the waste generated under the episodic provisions makes the facility “temporarily” SQG. Only VSQG waste can be “consolidated”.
Everyone Using/Receiving Manifests Must Register

> Register at CDX [https://test.epacdx.net/](https://test.epacdx.net/)
  - This is the front-facing CDX page
  - Select the "register" button, accept the terms and conditions,
  - Then select "RCRAInfo: Resource Conservation and Recovery Act Information" - which has a module for e-manifest
  - Registered “Site Manager” approves who uses the system

> In order to avoid system overload/delays during e-manifest rollout, you can and should go ahead and register now
Questions?

Christa Oerly Russell
Senior Consultant
Trinity Consultants
(317) 695-4644
crussell@trinityconsultants.com