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:
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- **Fact sheet:**

- **Frequently Asked Questions:**
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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
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

- \text{262.16(b)(8)(iv)}: Immediate access to communications or alarm system
- \text{262.16(b)(8)(v)}: Aisle space
- \text{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