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

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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
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
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