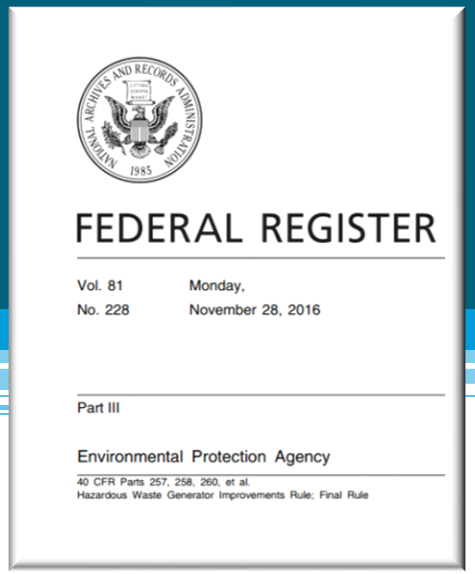
Hazardous Waste Generator Improvements Final Rule



US EPA
Office of Resource Conservation and Recovery

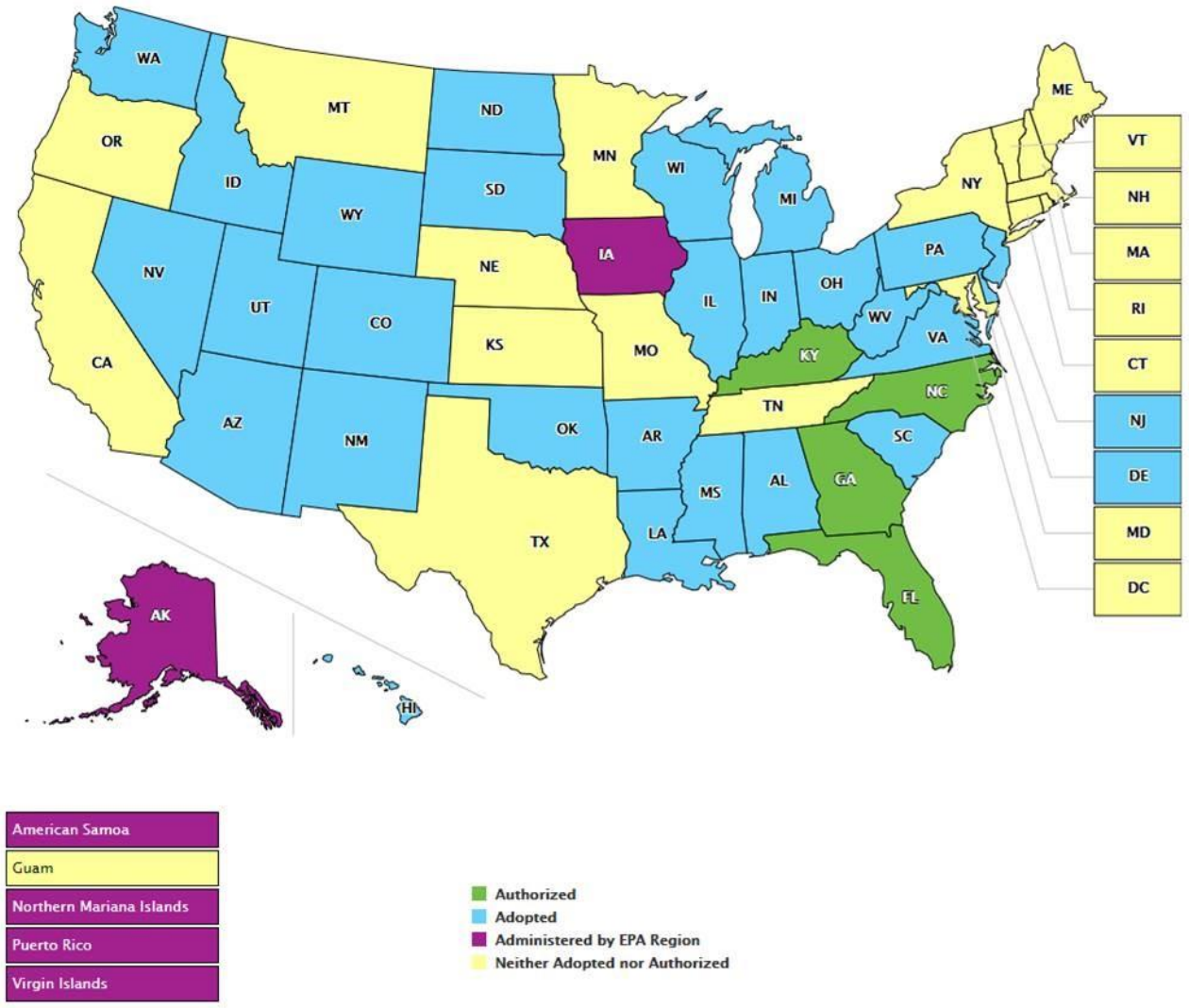
Contents

- Summary of the Generator Improvements Rule
- Six Major Rule Provisions
  - Satellite Accumulation Areas (§ 262.15)
  - Marking and Labeling (throughout generator regulations)
  - Episodic Generation (part 262 subpart L)
  - Consolidation of VSQG Waste at LQGs (Same Company) (§§ 262.14 & 17)
  - LQG's Quick Reference Guide (in part 262 subpart M)
  - SQG Re-notification (§ 262.18)

The Generator Improvements Final Rule

- Publication in Federal Register—November 28, 2016
- Effective Date – 6 months from publication—May 30, 2017
- Rule went into effect in IA, AK, the territories, and tribal lands on the effective date
- Authorized states run the RCRA program in their state and thus, will go through the state adoption & authorization process for this new RCRA rule
  - Authorized states have to pick up the more stringent provisions
  - Authorized states can choose to pick up the less stringent provisions and those provisions that are considered equally stringent (reorganization)
  - EPA encouraging states to pick up the entire rule as a package

Map of where the Generator Improvements Rule is in effect



Stringency of Final Rule

- More stringent:
  - SQG re-notification
  - SAAs subject to incompatibility and emergency preparedness & prevention requirements
  - Identifying hazards of wastes being accumulated on labels and RCRA waste codes added prior to shipment
  - Notification of closure
  - Closure as a landfill for LQGs accumulating hazardous wastes in containers that cannot meet closure performance standards
  - Biennial reporting for whole year, not just months the generator is an LQG
  - Biennial reporting for recyclers who don't store prior to recycling
  - Quick Reference guide for contingency plans
- Less stringent:
  - VSQG consolidation
  - Episodic generation
  - Waiver from 50-foot rule

Reorganization of Generator Regulations

Provision	Existing Citation	Final Citation
Generator Category Determination	§ 261.5(c)–(e)	§ 262.13
VSQG Provisions	§ 261.5(a), (b), (f)–(g)	§ 262.14
Satellite Accumulation Area Provisions	§ 262.34(c)	§ 262.15
SQG Provisions	§ 262.34(d)–(f)	§ 262.16
LQG Provisions	§ 262.34(a), (b), (g)–(i), (m)	§ 262.17

As part of this reorganization, the Agency made conforming changes to citations that previously referenced § 261.5 and § 262.34

Satellite Accumulation Areas (SAAs)

- SAA standards are now found in their own part of the generator regulations - §262.15
- What is a Satellite Accumulation Area (SAA)?
  - A location at a generator's facility where the generator accumulates up to 55 gallons of hazardous waste (or 1 quart of acute hazardous waste) in containers that are 1) at or near any point of generation, and 2) under the control of the operator
  - SAAs have fewer requirements than central accumulation areas, provided the generator complies with the regulations in section 262.15

Revisions to SAA Standards

- Changes include:
  - Explicitly state that hazardous wastes not be mixed or placed in a container with other hazardous wastes that are incompatible – applying the same storage standard for SAAs as CAAs in regard to incompatible wastes
  - Allow containers to remain open temporarily under limited circumstances, when necessary for safe operations:
    - For the proper operation of equipment, or
    - To prevent dangerous situations, such as build-up of extreme pressure
  - Provides maximum weight (1 kg) in addition to volume (1 quart) for acute hazardous waste limit

Revisions to SAA Standards (continued)

- Clarifies that “three days” means three consecutive calendar days for when waste must be moved to CAA or permitted TSDF
- Rescinds memo allowing reactive hazardous waste to be stored away from the point of generation
  - If waste is so dangerous it needs to be stored separately, then it needs to go directly to the CAA
- Makes marking and labeling regulations consistent with central accumulation areas
  - Labeled with the words “Hazardous Waste” and the hazards
  - Do not need an accumulation start date but do need to move in 3 calendar days when accumulation limit is reached – either to the CAA or TSDF and mark the date the accumulation limit is reached

Preamble Clarifications re: SAAs

"Under the Control of the Operator" means:

- The operator is someone familiar with the operations generating the HW
- Is aware of and able to attend to these operations, if needed
- Provides some measure of controlled access

Some examples of demonstrating the SAA is under the control of an operator:

- The operator controls access to SAA by access card, key, or lock box
- The operator accumulates waste in a locked cabinet and controls access to the key (even if access to the room is not controlled)
- The operator is regularly in view of the SAA during the course of their job
- The operator is able to see if anyone enters or exits the SAA

* There can be more than one operator having control of the SAA

Marking and Labeling

- Marking and labeling requirements apply throughout the hazardous waste management regulations.
- Final Rule: What changed?
  - Containers and tanks labels must have the words “Hazardous Waste” and also indicate the hazards of the contents of the accumulation units
  - For containment buildings, the generator must have a sign in a conspicuous place with the words, “Hazardous Waste” and the hazards of the waste
- Added the hazards to improve risk communication for workers, waste handlers, emergency responders, and visitors
- Flexibility in how to comply with this new provision; can indicate the hazards of the contents of the accumulation unit using any of several established methods (e.g., DOT hazard communication, OSHA hazard statement or pictogram, NFPA chemical hazard label, or RCRA characteristic)

Examples of Labels that Indicate the "Hazards"

- The applicable hazardous waste characteristic (i.e., ignitable, corrosive, reactive, toxic)

Examples of Labels that Indicate the "Hazards"

- Hazard communication consistent with DOT (49 CFR part 172 subpart E – labeling or subpart F – placarding)

Examples of Labels that Indicate the "Hazards"

- Hazard statement or pictogram consistent with OSHA (29 CFR 1910.1200)

Examples of Labels that Indicate the "Hazards"

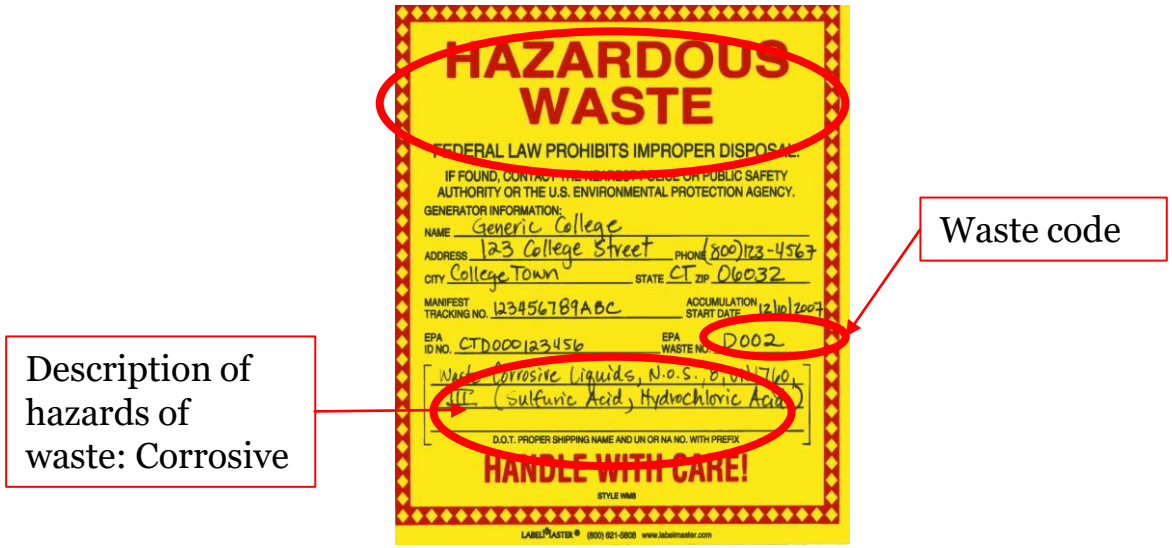
- Chemical hazard label consistent with the National Fire Protection Association code 704

Marking and Labeling

- EPA is providing flexibility on how to indicate the hazards of the contents of the containers
- Some clarifications:
  - Labeling should occur at the initial point of generation
  - For containers that have small containers inside (e.g., tubes, vials, etc.), generators can mark the outer/secondary container or attach a tag with the required information
  - For wastes that are in a container that already has appropriate marking and labeling (e.g., a commercial chemical product (CCP) in its original container with an intact label), the existing marking and labeling is sufficient, provided it indicates the hazards of the chemical
    - In that case, the generator would just add the words “Hazardous Waste”

Marking and Labeling

- Per §262.32, Generators must add the RCRA waste codes before shipping waste off-site
  - This allows receiving TSDFs to know how to treat the wastes to meet land disposal restriction requirements
  - Generators must mark their containers with the applicable RCRA waste codes or use a bar-coding system that performs the same function



Marking and Labeling

- Areas affected by the new Marking and Labeling standards include:
  - Generator satellite accumulation areas and central accumulation areas
  - Transfer facilities consolidating hazardous wastes from different generators
  - Generator container and tank storage areas at TSDFs
- Did not change the accumulation start date for central accumulation areas

Episodic Generation

Episodic Generation

- Previous RCRA rules lacked flexibility to address an "episodic" change in a generator's regulatory category:
  - Planned event (i.e., periodic maintenance such as tank cleanouts)
  - Unplanned event (i.e., production upset conditions, spill, acts of nature)

- Generators had to comply with a more comprehensive set of regulations for short period of time when they were not regular generators of higher levels of hazardous waste.

Episodic Generation

- Applicable to VSQGs and SQGs.
- New Part 262 Subpart L
  Allows generators that temporarily change their generator category as a result of an episodic event to operate under streamlined regulations.
- All hazardous waste from episodic events must be shipped by hazardous waste transporter with a hazardous waste manifest to a RCRA-designated facility (TSDF or recycler).

Episodic Generation

Where do I find the Episodic Generation Regulations?

- § 262.13(c)(8) states that hazardous waste managed as part of an episodic event does not have to be counted toward a generator's category

- Part 262 subpart L (§§ 262.230-262.233) contains the conditions for the episodic generation provision.

Episodic Generation

What is an Episodic Event?

- *Episodic event* means an activity or activities, either planned or unplanned, 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* means an episodic event that the generator planned and prepared for, including regular maintenance, tank cleanouts, short-term projects, and removal of excess chemical inventory
- *Unplanned episodic event* means an episodic event that the generator did not plan or reasonably did not expect to occur, including production process upsets, product recalls, accidental spills, or “acts of nature,” such as tornado, hurricane, or flood.

(§ 262.231)

Episodic Generation

Events Per Year

- One episodic event per year + one opportunity to petition EPA/ authorized state for a second event
- A generator can complete multiple projects during the time limit for the episodic event
- Petition process allows a total of 1 unplanned and 1 planned event per year
  - For example:
    - A generator conducts a clean out in the spring and then has an unexpected recall in October
    - A generator plans a small episodic project for the fall but a hurricane causes facility damage in July

Episodic Generation

Duration of an Episodic Event

- The first day of an episodic event is the first day of generation of waste for the event—for an unplanned event, this is the first day of the storm, spill, other unexpected event
- An episodic event can last 60 days
- All hazardous waste must be shipped off site by the end of 60 days or that waste counts toward the generator's category and must be managed under the regulations for that category of generator
- Time frame should allow waste from unplanned events to be characterized and allow arrangements for disposal to be made
- If a generator doesn’t know if the event is going to be episodic, we recommend notification

Episodic Generation

Notification

- Both VSQGs and SQGs must notify about episodic events using Site ID form (EPA form 8700-12)
- Planned event: notify 30 or more days prior to the episodic event on Site ID form
- Unplanned event: notify within 72 hours of the event by phone or email and follow up with Site Id form

Notification elements

- A VSQG must get an EPA ID number (automatic upon submitting the Site ID form)
- Start and end dates of the episodic event (no more than 60 calendar days)
- Reason for the event
- Types of hazardous waste
- Estimated quantities of hazardous waste
- Emergency coordinator contact information

Episodic Generation

Hazardous Waste Accumulation Standards

- Necessary to ensure protective management of larger quantities of hazardous waste

VSQGs

- Marking and labeling:
  - "Episodic hazardous waste;"
  - An indication of the hazards of the contents; and the date the episodic event began
    - For tanks, inventory logs or other records are appropriate, but must be accessible
- Manage the hazardous waste in a manner that minimizes the possibility of an accident or release
  - Containers should be in good condition, chemically compatible with contents, and kept closed
    - Part 265 subpart I would satisfy this condition
  - Tanks must have procedures in place to prevent overflow (*e.g.*, a means to stop inflow such as a waste feed cutoff system or bypass system to a standby tank when hazardous waste is continuously fed into the tank). Tanks must be inspected at least once each operating day.
- Treatment is not allowed by VSQGs (except in an on-site elementary neutralization unit).
- Hazardous wastes on drip pads and in containment buildings cannot be managed under subpart L

Episodic Generation

Hazardous Waste Accumulation Standards

SQGs

- Marking and labeling:
  - "Episodic Hazardous Waste;"
  - An indication of the hazards of the contents and the date the episodic event began
    - For tanks, inventory logs or other records are appropriate, but must be accessible
- All conditions of 262.16 (e.g., container and tank standards, employee training, emergency preparedness and prevention)
- Hazardous wastes on drip pads and in containment buildings cannot be managed under subpart L

Episodic Generation

Recordkeeping

- Cradle to grave management of hazardous waste is required
- Records must be maintained for 3 years from the completion of each event

Elements

- Beginning and end date of the episodic event
- A description of the episodic event
- Types of hazardous wastes generated
- Quantities of hazardous wastes generated
- How the hazardous waste was ultimately managed and the name of the RCRA-designated facility or facilities that received the hazardous waste
- Name of the hazardous waste transporter(s)
- Approval letter from EPA if a petition was submitted and approved for a second event

- Copies of the notification form and the hazardous waste manifest cover most of the elements.

Episodic Generation

Petition for a Second Event

- If petition is approved, total of one planned and one unplanned event per calendar year

Petition requirements

- Made in writing
- Include reason for the event; nature of the event; estimated amount of hazardous waste to be managed; how the waste will be managed; estimated length of the episodic event; and information about the previous event in the calendar year

Planned event

- Petition submitted to EPA/authorized state 30 or more days prior to the event
- Generator may not manage hazardous waste from a planned second episodic event under subpart L until approval is received on its petition

Unplanned event

- EPA/authorized state must be notified within 72 hours by phone or email, followed by submittal of 8700-12 and an indication that this is a petition for a second event
- Generators can manage hazardous waste from an unplanned second episodic event under subpart L while waiting for approval of its petition
- If a petition is denied, generator must start managing hazardous waste under the conditions for the applicable generator category.

Episodic Generation – Example 1

- **Planned event**: In early 2022, an SQG plans a maintenance project in the fall and anticipates they are likely to exceed the SQG limit of 1000 kg in October 2022.

- The event starts September 17, 2022, and is scheduled to be completed by November 5, 2022. Sixty days are over on November 16, 2022.
  - This CAN be an EPISODIC EVENT!
- Preparation:
  - SQG identifies waste codes for waste to be generated and estimates waste amounts
  - SQG notifies state before August 18, 2022, using the Site ID form (30 days before the event begins)
  - SQG sets up contracts and plans for waste transport and management. All waste must be off site by November 16th.

Episodic Generation – Example 1 (continued)

- **Planned event**: In early 2022, an SQG plans a maintenance project in the fall and anticipates they are likely to exceed the SQG limit of 1000 kg in October 2022.

- Event:
  - SQG completes maintenance project, manages the hazardous waste under 262.16 standards and sends all waste for hazardous waste management.
  - (If the event or waste management runs past November 16th, the SQG must begin operating as an LQG)
- After Event:
  - SQG maintains records for the event for 3 years (a description of the event and notifications & manifests).
  - If SQG has ANOTHER episodic event in 2022 after the maintenance project is over and it is unplanned, it can petition the state for a second event.

Episodic Generation – Example 2

- **Unplanned event**: In March 2022, a VSQG experiences a storm that causes a spill of product, and they expect the clean up will cause them to exceed the 100 kg limit for March and April, 2022.

- The storm occurs on March 8. This is the first day of the event. The VSQG isn't sure if spilled chemicals are hazardous waste but they suspect they may be. Sixty days are over on May 7, 2022.
  - This CAN be an EPISODIC EVENT!

Episodic Generation – Example 2 (continued)

- **Unplanned event**: In March 2022, a VSQG experiences a storm that causes a spill of product, and they expect the clean up will cause them to exceed the 100 kg limit for March and April, 2022.

- Event:
  - VSQG notifies state within 72 hours by call or email & follows up with a Site ID form; if the VSQG already had a planned event in 2022, it must submit a petition and can operate under the episodic standards while waiting for approval from the state
  - VSQG samples hazardous waste and sets up hazardous waste transportation and disposal
    - If the clean up material is not hazardous waste or does not exceed the VSQG threshold, the generator can work with the state to cancel the event
  - VSQG completes cleanup, manages the hazardous waste under VSQG episodic generator standards and sends all waste for HW management by May 7th.
  - (If the event or waste management runs past May 7th, the VSQG must begin operating as an SQG or LQG, as appropriate)
- After Event:
  - VSQG maintains records for the event for 3 years (notifications and manifests)
  - If VSQG has ANOTHER episodic event (planned) in 2022 after the clean up is over, it has to petition the state for a second event.

VSQG Waste Consolidation at LQGs

VSQG Waste Consolidation at LQGs

Issue that the New Consolidation Provision Addresses

- Some companies would like to be able to consolidate wastes from their own VSQG sites for more efficient shipping and hazardous waste management
  - Reduces liability for company as a whole by ensuring proper management of hazardous waste
  - Sending to a RCRA-designated facility is the most environmentally sound option
  - Previously, an LQG needed a RCRA permit to receive VSQG wastes

VSQG Waste Consolidation at LQGs

New Consolidation Provision

- Consolidate waste at an LQG under the control of the same person:
  - Person – as defined under RCRA in § 260.10 - means an individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body
  - Control – means the power to direct policies at the facility

- VSQG standards
  - Marks and labels waste containers with “Hazardous Waste” and the hazards
- No hazardous waste manifest is required and hazardous waste transporters do not have to be used

VSQG Waste Consolidation at LQGs

LQG standards

- Notifies state on Site ID Form that it is participating in this activity and identifies which VSQGs are participating
- Recordkeeping for each shipment – normal business records
- Adds accumulation start date to VSQG HW labels when arrives at LQG
- Manages consolidated waste as LQG hazardous waste including ensuring final treatment or disposal is at a RCRA-designated facility (TSDF or recycler)
- Reports in Biennial Report – there is a different source code (G51) for the VSQG consolidated waste to distinguish from the LQG's own generated waste

- We did not extend this provision to allow SQGs to consolidate VSQG HW due to more complicated implementation issues but an SQG can participate if they notify and act as an LQG (meeting all LQG standards including getting the VSQG HW off-site in 90 days)

VSQG Waste Consolidation at LQGs

FAQs about New Consolidation Provision

- When does the 90-day clock start for VSQG consolidated waste?
  - When the VSQG waste gets to the LQG, the 90-day clock to accumulate the waste starts
- Is there any accumulation limit for how much waste can be consolidated at an LQG?
  - No, there is no overall accumulation limit but the waste must be sent off-site to a RCRA TSDF or recycler within 90 days
- Does the LQG add the VSQG waste to its annual generation amount?
  - The LQG would report both its own generated waste and the waste consolidated from its VSQGs on the Biennial Report. However, there is a different source code (G51) for the VSQG waste so they can distinguish between their own HW and the consolidated waste

VSQG Waste Consolidation at LQGs

FAQs about New Consolidation Provision

- When transporting the waste from the VSQG to the LQG, what requirements must be met?
  - There are no specific RCRA requirements for the transport but any applicable DOT requirements would continue to apply
- Is there a quantity limit for shipments from the VSQG?
  - No, but the VSQG has to stay within its own accumulation limit
- Can the VSQG and the LQG be in different states?
  - Yes, if both states have adopted the consolidation provision. If the HW is transported through other states, the generator should check with the transit state to see if they can pass through

VSQG Waste Consolidation at LQGs

FAQs about New Consolidation Provision

- What marking and labeling should be on the containers?
  - At the VSQG, the words “Hazardous Waste” and the hazards
  - At the LQG, the words “Hazardous Waste,” the hazards, and the accumulation start date

- Can the LQG consolidate VSQG HW with in the same container with their own LQG HW?
  - Yes, if the waste is compatible. The LQG would need to use the earlier accumulation start date on the combined HW to determine how long the combined HW can remain on-site.

VSQG Waste Consolidation at LQGs - Example

- Army reserve facilities that are VSQGs could consolidate their HW at an Army base that is an LQG (assuming they are in states that have adopted the consolidation provision)
  - They could transport the waste themselves and would not need to manifest it as long as the LQG has notified, including listing the participating VSQGs on the Site ID form
  - The Army reserve sites (the VSQGs) would need to mark the containers with the words “Hazardous Waste” and the hazards of the waste in the containers. For example, if they generate spent solvents that are ignitable, the containers could be marked:

VSQG Waste Consolidation at LQGs - Example

- Once the VSQG waste arrives at the Army base, the LQG would add the accumulation start date and manage the waste as LQG waste, including getting it off-site to a TSDF in 90 days
- The LQG would also keep the shipping records of the waste received from the VSQG for 3 years
  - These records would include:
    - the name, address, and contact info for the VSQG, and
    - a description of the waste received, including the quantity and date the VSQG waste was received
- The LQG would report the VSQG waste consolidated at their site on their BR using the new source code (G51) on the GM form

Emergency Preparedness and Planning

Contingency Plan Quick Reference Guide

- The Quick Reference Guide is a new part of an LQG's contingency plan designed to provide easy access for emergency responders to the most critical information for an immediate response to an event
- New LQGs submitting contingency plans must also include a Quick Reference Guide
- Existing LQGs must include a Quick Reference Guide when they otherwise update and submit their contingency plan

(§ 262.262)

Emergency Preparedness and Planning

Contingency Plan Quick Reference Guide

- Contents of the Quick Reference Guide (eight elements)
  - 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)
- EPA encourages generators to work with local emergency authorities and others to identify additional information that could be included

Quick Reference Guide Example (pg 1)

EXAMPLE QUICK REFERENCE GUIDE

This example was created by EPA Region 7 to be used as a guide to assist the regulated community with compliance. It does not substitute for or replace any regulatory requirements.

Contingency plan quick reference guide

ABC FACILITY
1000 SW Main Street
Anytown, Iowa 50000

Facility Contacts:

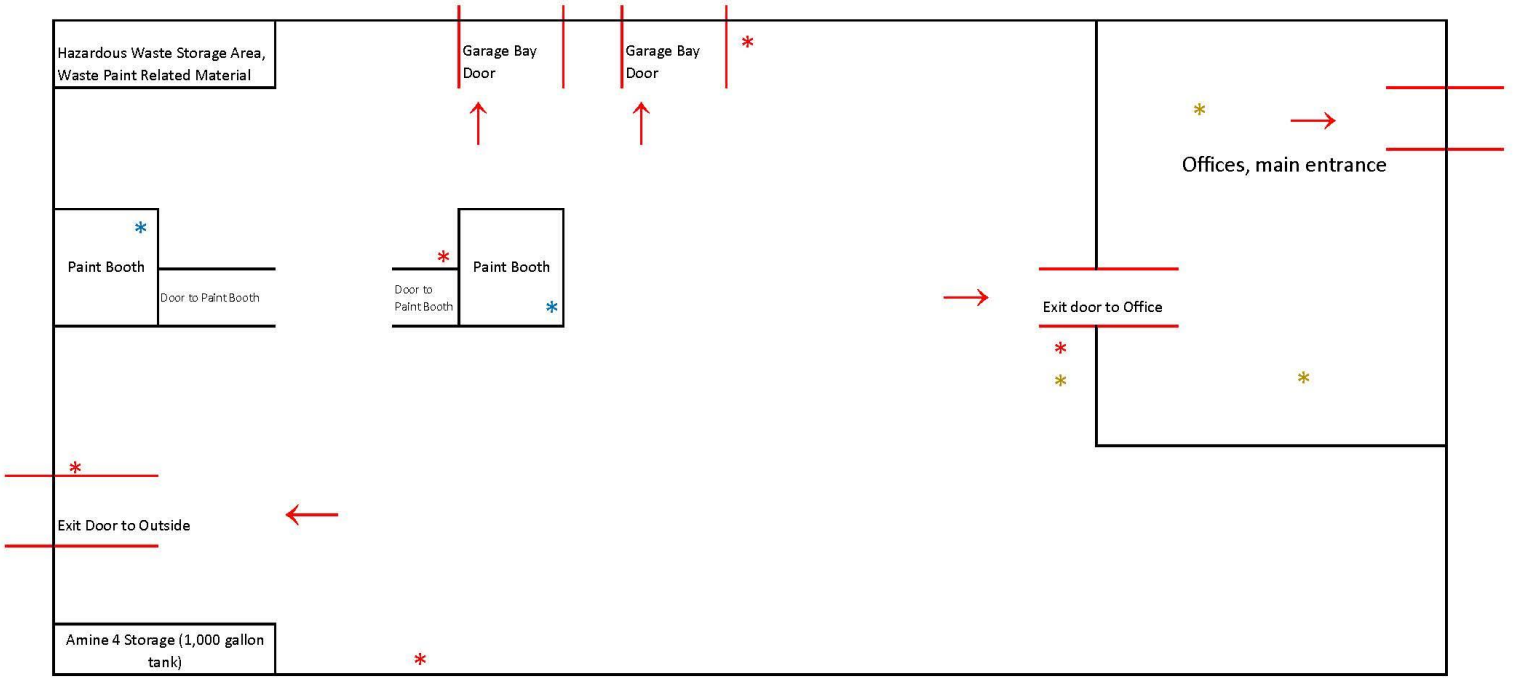
Primary Emergency Coordinator:	George Washington	Mobile Number (24/7):	515-555-0000
Secondary Emergency Coordinator:	Abraham Lincoln	Mobile Number (24/7):	515-555-0001
Tertiary Emergency Coordinator:	Martha Washington	Mobile Number (24/7):	515-555-0002

Note: ABC Facility operates 3 shift, 24/7, but the order of contact during an emergency is listed above.

Hazardous Waste Information:

Name of Waste	Waste Codes/Hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	NW corner of Warehouse, hazardous waste storage area	Five, 55-gallon drums (2,065 pounds)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	Two Satellite Accumulation Areas as noted with blue asterisks on the attached map.	One, 55-gallon drum (440 pounds)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Off-specification 2, 4-D , a herbicide, (brand name is Amine 4) (liquid)	D016 (toxicity); Flashpoint 190 °F.	SW corner of warehouse near new product storage of Amine 4.	Off-Spec – 1 tank, 1,000 gallons New product – 1 tank (same tank as off-spec), 1,000 gallons	Use PPE to prevent contact with skin and eyes. Immediately prevent spills from entering drains and waterways. Prevent sources of ignition and open flames.	Contact Chemtrac for emergency medical treatment information at 1-800-424-9300. If in eyes, wash eyes for several minutes.

Quick Reference Guide Example (pg 2)



* Satellite Accumulation Area for Paint Related Waste Material (D001, F003, F005)

* Fire Alarms (ring on-site only, there are no fire alarms that notify off-site personnel)

* Telephone for off-site notification of emergency

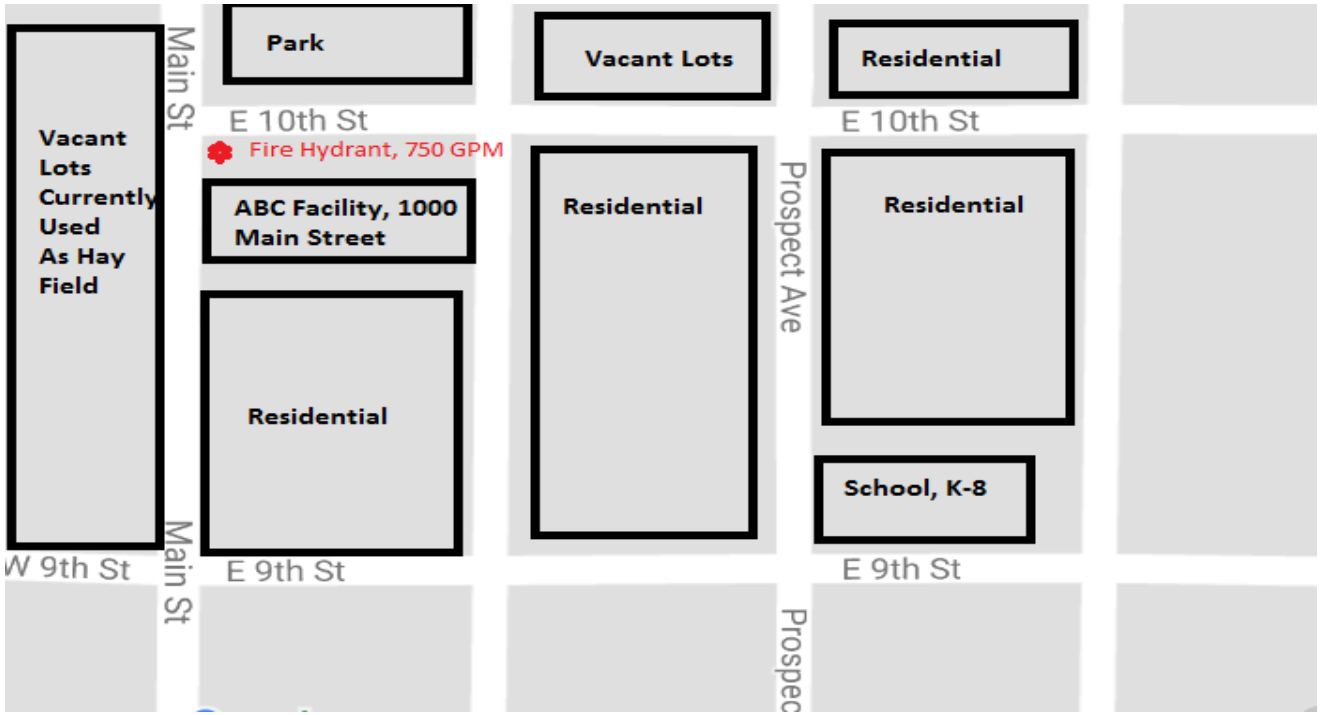
→ Indicates evacuation route out of the building.

Note 1: Hazardous waste (paint related waste) is generated and accumulated inside each of the two paint booths, and is accumulated in the hazardous waste storage area. Amine 4 can be a hazardous waste if it is off-specification and it is generated and accumulated in the SW corner at the Amine 4 tank.

Note 2: Smoke detectors are located throughout the office and main warehouse on the ceiling, in a grid about every 25 feet. Smoke detectors are connected to an automatice sprinkler system.

Quick Reference Guide Example (pg 3)

Street Map



SQG Re-notification Provision

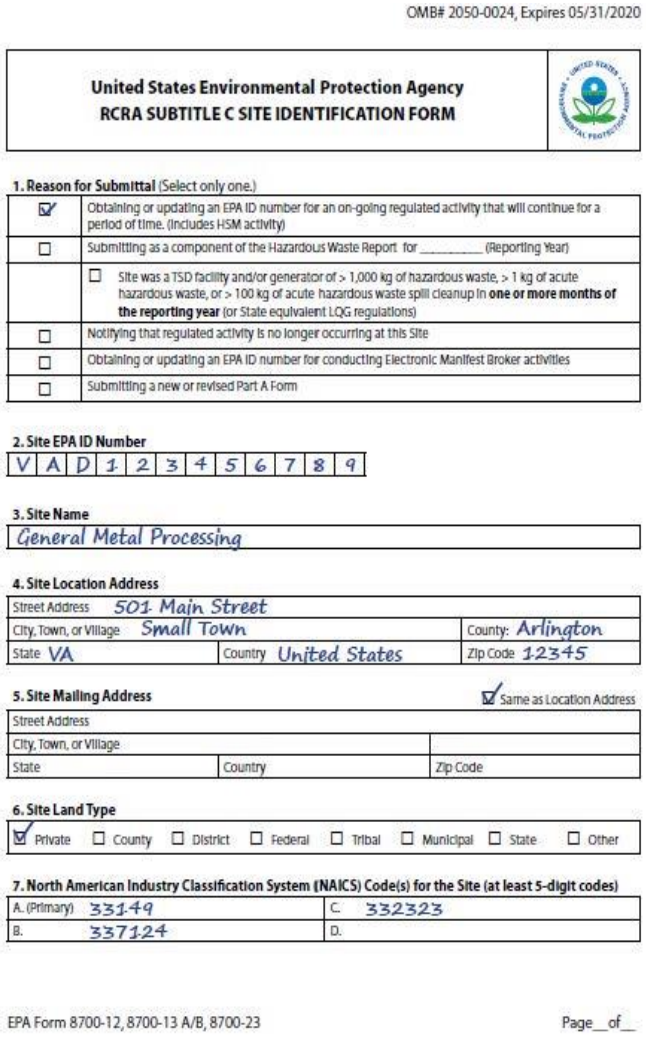
§ 262.18(d) Re-notification

(1) A small quantity generator must re-notify EPA starting in **2021** and every four years thereafter using EPA Form 8700–12. This re-notification must be submitted by September 1st of each year in which re-notifications are required.

- EPA made the reporting time frame off-cycle with the Biennial Report to reduce the impact on state programs.
  - Note: SQGs located in states with more frequent re-notification should comply with the state's timeframe. States that already require re-notification need to make sure that information gets updated in RCRAinfo.

SQG Re-notification Webpage and Resources

- SQGs will use the Site ID form (8700-12) unless the state has its own equivalent notification form
- Subsequent renotification due every 4 years unless the state requires it more often
- New memo: RO 14926
- New website: https://www.epa.gov/hwgenerators/re-notification-requirement-small-quantity-generators



OMB# 2050-0024, Expires 05/31/2020

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 HSM activity)
☐	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
☐	Site was a TSD 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 LQG 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 Part A Form

2. Site EPA ID Number

V	A	D	1	2	3	4	5	6	7	8	9

3. Site Name

General Metal Processing

4. Site Location Address

Street Address: 501 Main Street		
City, Town, or Village: Small Town		County: Arlington
State: VA	Country: United States	Zip Code: 12345

5. Site Mailing Address ☑ Same as Location Address

Street Address		
City, Town, or Village		
State	Country	Zip Code

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)	33149	C.	332323
B.	337124	D.	

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SQG Re-notification Resources

On the SQG Re-notification webpage:

- **Outreach Materials:**
  - **SQG email language:** Sample email language that states and EPA Regions can use to announce to their SQGs that they need to re-notify. This SQG email language is translated into languages commonly found in the U.S.
  - **SQG postcards:** Postcards for states and EPA Regions to send out to SQGs announcing they need to re-notify. The SQG postcard is also translated into common languages found in the U.S.
- **SQG Data Cleanup Instructions:** outlines the process for states to clean up their SQG data prior to the September 1, 2021 deadline (or future deadlines) by identifying SQG sites in the database that are no longer conducting hazardous waste generator activities (e.g., gone out of business) or have changed their generator category without notifying EPA or their state.

EPA resources

Main generator website: https://www.epa.gov/hwgenerators

Generator Improvements Rule website: https://www.epa.gov/hwgenerators/final-rule-hazardous-waste-generator-improvements

Link to the map of states that have adopted the new rule: https://www.epa.gov/hwgenerators/where-hazardous-waste-generator-improvements-rule-effect

FAQs for implementing the rule: https://www.epa.gov/hwgenerators/frequent-questions-about-implementing-hazardous-waste-generator-improvements-final-rule

We also plan to update existing guidance and resources as much as possible with new terms and citations

Newly Updated Guide and Factsheets

- **Managing Your Hazardous Waste: A Guide for Small Businesses**
  - **A 32-page guide on RCRA regulations aimed at Small Quantity Generators, updated in October 2019**
    - Available to download here in 8 languages: https://www.epa.gov/hwgenerators/managing-your-hazardous-waste-guide-small-businesses
- **Two Companion factsheets:**
  - **Fact Sheet on Requirements for Very Small Quantity Generators of Hazardous Waste**
    - Available to download here: https://www.epa.gov/hwgenerators/fact-sheet-requirements-very-small-quantity-generators-hazardous-waste
  - **Fact Sheet on Requirements for Large Quantity Generators of Hazardous Waste**
    - Available to download here: https://www.epa.gov/hwgenerators/fact-sheet-requirements-large-quantity-generators-hazardous-waste

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