

January 20, 2017

SPECIAL NOTICE
SIGNIFICANT CHANGES TO HAZARDOUS WASTE
GENERATOR REQUIREMENTS

Soon, the Illinois EPA will adopt new US EPA rules regarding changes for the hazardous waste generator rules. Over 60 changes have been made. Here are the highlights of the rules changes:

- The regulations for labeling and marking of containers and tanks are revised to require clear indication of the hazards of the hazardous waste contained inside. The hazards can be indicated using any of several established methods or labels (e.g. DOT hazard communication, OSHA hazard statement or pictogram, NFPA chemical hazard label, or RCRA characteristic).
- Beginning in 2021, re-notification for small quantity generators (SQGs) is required every four years (SQGs only notify once under the current system).
- Very small quantity generators (VSQGs) (previously known in the federal regulations as "conditionally exempt small quantity generators"-CESQGs) are allowed to send hazardous waste to a large quantity generator (LQG) that is under the control of the same person and consolidate it there before sending it on to management at a RCRA-designated facility, provided certain conditions are met.
- A VSQG or SQG is allowed to maintain its existing generator category even in the case of an unusual event (such as a cleanout or an act of nature) that causes its generator category to temporarily increase. Under this provision, generators that satisfy the listed conditions do not have to comply with the more stringent generator standards.
- The emergency response and contingency planning provisions for SQGs and LQGs are to include Local Emergency Planning Committees (LEPC) among those emergency planning organizations with which a generator may make response arrangements. In addition, new and existing LQGs are to submit quick reference guides with the key information to local responders for easy access during an event when the LQG either initially develops or updates their contingency plans.

Additional explanation, discussion and guidance on the very specific and detailed changes can be found at the following US EPA website: <https://www.epa.gov/hwgenerators>.

Our professional staff is available to assess your situation and to prepare an up-to-date contingency plan for your facility. At **Admiral**, we have 40 years of experience meeting the needs of industry. Please call us today at (847) 228-5355.

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