

EPA's Proposed Generator Improvements Rule

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Overview of Proposed Rule

- Proposed Rule issued September 25, 2015.
 - <http://www2.epa.gov/hwgenerators/proposed-rule-hazardous-waste-generator-improvements>
- EPA is accepting comments on the proposed rule.
- Comments due by Tuesday, November 24, 2015.
- There have been several requests for an extension to this date.
- EPA should decide soon whether to extend the due date (likely 30 days).
- Some of the proposed changes are more stringent, some are less stringent.

Key Provisions of Proposed Rule

- Reorganize generator requirements to make them easier to understand.
- CESQG waste can be consolidated at an LQG site operated by the same person.
- Specific requirements for episodic generation events.
- Contingency Plan Executive Summary (LQGs).
- Documentation of attempts to make arrangements with local officials (LQGs).
- Update emergency requirements to be consistent with EPCRA (LEPCs).
- Clarify hazardous waste determination requirements.

Key Provisions (Cont.)

- Labeling requirements: identification of hazards.
- Biennial Re-Notification by SQGs.
- LQG Biennial Report: clarify requirements, remove inconsistencies, etc.
- Clarification and improvement of satellite accumulation area requirements.
- Improve LQG closure requirements.
- Clarify determination of generator status.
- Other smaller changes.

Looking Ahead...

- EPA will review comments that are submitted.
- Unless comments are very unfavorable, EPA will issue a final rule (probably sometime in CY 2016).
- If EPA issues a final rule, it would not be effective in Connecticut until we amend our regulations to adopt it.

Questions?

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