



Small Quantity Hazardous Waste Generators

The New RCRA Requirements

- Retain manifests signed by the hazardous waste facility for at least 3 years. (The facility will be required to return a copy of the signed manifest to the generator.)
- Notify EPA at least twice a year of any manifests that are not returned by the facility.

Education/Assistance Program

Because the new RCRA provisions regulate a large number of companies for the first time, EPA is conducting an education/assistance program to alert small quantity generators to their responsibilities under federal law. The program is in two phases, paralleling the two phases in which the new RCRA will be implemented.

For the provisions that must be implemented by August 1985, EPA will:

- Identify potential small quantity generators.
- Provide information—through EPA regional offices, states and trade associations—to help small quantity generators determine if they are affected by the new regulations. This information will identify wastes by product trade names, chemical and slang names, or general descriptions; and will correlate the waste with the appropriate Department of Transportation identification number wherever possible.
- Inform small quantity generators of the need to prepare a Uniform Hazardous Waste Manifest to accompany any waste they ship, and explain how and where to obtain the appropriate manifest form.

For the final regulations—to be issued by March 31, 1986, or that take effect automatically on April 1, 1986, if EPA does not issue final regulations on time—EPA must:

- Alert the small quantity generators to the new regulations and the additional requirements.
- Provide them with complete instructions and industry-specific information that will help them in complying.

To help in carrying out this education/assistance program, EPA is working closely with trade associations, small business organizations, and state and local government organizations.

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On November 8, 1984, amendments were enacted strengthening the Resource Conservation and Recovery Act (RCRA), the federal law which protects human health and the environment from improper waste management practices. This new legislation—the Hazardous and Solid Waste Amendments—makes many changes in the national program which regulates hazardous waste from the time it is generated to its final disposition. The program is administered by the U.S. Environmental Protection Agency (EPA) through its Office of Solid Waste.

One of the new RCRA provisions directs EPA to promulgate regulations for the generators of small quantities of hazardous waste. Previously, EPA regulated only those establishments generating more than 1,000 kilograms (2,200 pounds) of hazardous waste per month. Under the new law, establishments that generate 100 kilograms (220 pounds, or roughly half a 55-gallon drum) but less than 1,000 kilograms in a calendar month will have to comply with those requirements which cover the transportation and disposal of hazardous waste.

Newly Regulated Businesses

EPA estimates that the new RCRA will increase the number of federally regulated generators from about 15,000 to well over 100,000 firms. An EPA survey released in March 1985 suggested that more than half of these small quantity generators fall into one of five categories:

- Vehicle maintenance
- Manufacturing and finishing of metals
- Printing
- Photography
- Laundries and dry cleaners

Other industrial categories with a substantial number of small quantity generators are: wood preserving, analytical and clinical laboratories, construction, and pesticide applicators.

The new federal requirements will have their greatest impact on the waste management practices of firms not now regulated by state hazardous waste laws. At least 22 states currently impose some degree of regulation on small quantity generators.

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August 1985 Requirements

Starting in August 1985, small quantity generators who ship their hazardous waste off their premises must obtain and fill out parts of a Uniform Hazardous Waste Manifest. This is a form that EPA and the Department of Transportation (DOT) currently require all regulated hazardous waste generators to use when they ship hazardous waste. The manifest provides a way to track a shipment of hazardous waste from its origin to its final disposal.

The manifest must accompany shipments of hazardous waste made after August 5, 1985. The manifest must include:

- The generator's name, address, and signature.
- The DOT description of the waste, including the shipping name, hazard classification, and identification number.
- The number and type of containers.
- The quantity of waste being transported.
- The name and address of the facility designated to receive the waste.

March 31, 1986 Deadline

By March 31, 1986, EPA must issue final regulations that protect human health and environment from small quantities of hazardous waste. At a minimum, the new regulations must:

- Require that hazardous waste from generators of more than 100 kilograms per month must be treated, stored, or disposed of at an approved hazardous waste facility.
- Allow small quantity generators to store waste on the premises of the establishment for up to 180 days without the need for a storage permit. The period may be extended to 270 days for waste that must be transported more than 200 miles, provided that no more than 6,000 kilograms are stored.

If EPA fails to issue final regulations by March 31, 1986, hazardous waste from small quantity generators automatically becomes subject to these minimum requirements.

In addition, for waste shipped off-site, small quantity generators will be required to:

- Include the name of the transporter on the manifest.
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