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## Hotline Questions and Answers

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### 2. RCRA Waste Minimization Requirements

RCRA subjects generators of hazardous waste and treatment, storage, and disposal facilities (TSDFs) that manage their own hazardous waste on site to waste minimization requirements. What are the specific requirements?

Generators who generate 1,000 or more kilograms per month of hazardous waste ("large quantity" generators) and owners and operators of hazardous waste TSDFs who manage their own hazardous waste on site must comply with similar waste minimization requirements. RCRA 3002(b) requires large quantity generators who transport waste off site to certify on the manifest that they have established a "program in place" to reduce the volume or quantity and toxicity of hazardous waste generated to the extent economically practicable. For owner/operators that manage waste on site in a permitted TSDF, 3005(h) requires that a certification that a waste minimization program is in place be prepared annually and maintained in the facility operating record. In the May 28, 1993, Federal Register (58 FR 31114), EPA published interim final guidance on the elements of a waste minimization "program in place" to assist generators and TSDFs in fulfilling these requirements. The guidance provides latitude for a facility to tailor program elements to meet the individual facility's needs. EPA has published a Facility Pollution Prevention Guide, EPA600-R-92-088, to assist generators in tailoring the guidance to the individual facility's needs.

RCRA 3002(a)(6) also requires large quantity generators to submit biennial reports describing their waste minimization efforts. Specifically, large quantity generators must describe the efforts undertaken to achieve waste minimization and the actual changes in the volume and toxicity achieved relative to other years (262.41(a)(6)-(7)). The biennial report requirements for TSDFs that generate waste parallel those specific to large quantity generators (264/265.75(h) and (i)).

Small quantity generators who generate greater than 100 kilograms but less than 1,000 kilograms of hazardous waste per month are not subject to the same "program in place" certification requirement as large quantity generators. Instead, they must certify on their hazardous waste manifests that they have "made a good faith effort to minimize" their waste generation (51 FR 35190; October 1, 1986).