

PPC 9441.1980(05)

SMALL QUANTITY GENERATOR APPLIES TO AGGREGATE AMOUNT OF  
WASTES GENERATED AT A FACILITY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 17 1980

Mr. William A. McClintic  
Defense Division  
Brunswick Corporation  
150 Johnston Road  
Marion, Virginia 24354

Dear Mr. McClintic:

This is in response to your letter of September 25, 1980, asking for clarification of the applicability of our hazardous waste management regulations to very small quantities of hazardous wastes generated by a generator who also generates a large quantity of hazardous waste.

The small quantity generator special requirements of §261.5 of our regulations are only available to generators that generate an aggregate amount of hazardous wastes of less than 1000 kilograms per month at any one site or facility. If the aggregate amount of hazardous wastes generated at a site or facility exceeds this monthly amount, then the special requirements of §261.5 do not apply to any of the hazardous wastes generated at that site or facility. I am afraid, therefore, that the very small quantities of hazardous waste generated at your Marion facility are subject to the "full" regulations because the single large quantity of hazardous waste disqualifies the facility for the special small quantity generator requirements.

I hope this sufficiently answers your questions.

Sincerely yours,

Gary N. Dietrich  
Associate Deputy Assistant Administrator  
for Solid Waste

bcc: Filomena Chau w/incoming

RO 12013

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