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OCT. 31, 1985

SMALL QUANTITY GENERATOR REGULATIONS APPLICABILITY TO
LABORATORIES

Maurice Golden
456 Kilbourn Road
Rochester, NY 14618

Dear Mr. Golden:

I have been asked to respond to your letter of October 17, 1985, requesting information on proper handling of small quantities of laboratory wastes, and on the amended hazardous waste management regulations in general.

As you indicate in your letter, the Hazardous and Solid Waste Amendments of 1984 (HSWA) do set new requirements for generators of small quantities of waste (between 100 and 1000 kilograms in a calendar month), and small laboratories are among those likely to be affected by these changes in the law. As you may know, a number of "interim" requirements--primarily use of the Uniform Hazardous Waste Manifest when shipping waste off-site for treatment or disposal--became effective August 5, 1985. The HSWA also directs EPA to promulgate final regulations for generators of between 100 and 1000 kilograms of hazardous waste in a calendar month by March 31, 1986.

EPA's Office of Solid Waste has developed a new brochure to assist affected businesses in complying with the "interim" requirements that went into effect in August. A copy of this brochure is enclosed. I have also included a "Laboratories" insert to the brochure which provides information that labs may find helpful in completing Item 11 of the Manifest, the Department of Transportation proper shipping description. If you feel that the brochure and insert will be helpful to your classes, you can obtain additional copies from EPA Regional Offices, or by calling toll-free either the RCRA Hotline (800-424-9346) or Small Business Hotline (800-368-5888).

EPA is currently working to issue final rules for small quantity generators by the March 31 deadline. Proposed rules were published for public comment in the August 1, 1985 Federal Register; a copy is enclosed. The comment period closed September 30, 1985, and staff is now analyzing and addressing comments received.

So that you can stay abreast of the changes made in RCRA and of regulations

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that may affect laboratories generating small quantities of hazardous waste, I have added your name to our mailing list of those interested in RCRA

reauthorization and small quantity generator issues. You can expect to receive periodic updates and other information as it becomes available.

I hope I have addressed your questions and the enclosed information will be of assistance. Thank you for your interest in the small quantity generator program.

Sincerely yours,

Deborah Rutherford
Office of Solid Waste

Enclosure