



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
LAND AND EMERGENCY
MANAGEMENT

Date: 11.19.2021

COVERSHEET: EXPLANATION OF CITATION AND/OR TERMINOLOGY CHANGES IN THIS POLICY DOCUMENT

This policy document remains wholly in effect, but some or all of the regulatory citations within it have changed. These changes do not alter the existing regulatory interpretations.

As part of the [2016 Hazardous Waste Generator Improvements Rule](#), many of the regulations that apply to hazardous waste generators were moved to, or reorganized within, title 40 of the Code of Federal Regulations (CFR) part 262. To view a crosswalk between the old and new citations, please visit the [Hazardous Waste Generator Regulations Crosswalk webpage](#).

The Hazardous Waste Generator Improvements Rule also made changes to terms that may be included in this document. The most common term change was replacing “conditionally exempt small quantity generators” (CESQGs) with “very small quantity generators” (VSQGs). In addition, EPA defined the term “central accumulation area” (CAA) to mean a generator’s 90- or 180-day accumulation area for hazardous waste.

A handwritten signature in cursive script that reads "Jessica Young".

Jessica Young
Chief of the Recycling and Generator Branch
Office of Resource Conservation and Recovery

9451.1993(01)

United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

September 20, 1993

Mr. Frank J. Prasil
Recycled Printer's Ink
133 West End Avenue
Knoxville, Tennessee 37922

Dear Mr. Prasil:

This is in response to our phone conversations of September 14 and 15, 1993, in which you asked me to clarify a couple of points in the September 1, 1993, letter from Mr. Denit to you. Specifically, I confirmed that under Federal regulations at 40 CFR Section 261.5(g), conditionally exempt small quantity generators of hazardous waste may send their waste to any of the types of facilities specified in Section 261.5(g)(3), and this includes "a facility which beneficially uses or reuses, or legitimately recycles or reclaims..." the waste. (Section 261.5(g)(3)(v)(A).)

Further, as we discussed, waste shipped from conditionally exempt small quantity generators under the conditions of Section 261.5 need not be accompanied by the National Uniform Hazardous Waste Manifest. Finally, as the September 1, 1993, letter from Mr. Denit noted, individual States may have more stringent regulations than EPA's, and U.S. Department of Transportation regulations also may apply. Thank you for your interest in sound recycling of waste. If you have further questions, please contact Ross Elliot or Ann Codrington of my staff at (202) 260-8551.

Sincerely,
Michael J. Petruska, Chief
Regulatory Development Branch

RO 11772