



## 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

9441.1987(13)

BOUNDARY SANDS RECYCLED AND RETURNED TO THE BOUNDARY

MAR. 04, 1987

Mr. Michael Piznar  
Neptune Water Meter Company  
Route 229 South  
Tallahassee, AL 36078-1799

Dear Mr. Piznar:

Thank you for your letter of January 19, 1987, confirming our telephone conversation. As I explained by telephone, EPA's hazardous waste regulations have special requirements for wastes that are recycled. You should review Part 261.2 and 261.6.

Based on the information you provided in our conversation the treatment process necessary to recycle your foundry sands back into your foundry would appear to be exempt from the need for a RCRA treatment permit. However, you should be aware that you will need to comply with the generator storage requirements if the wastes are stored in a tank or container for less than 90 days (40 CFR 262.34) or will need a storage permit if the wastes are stored on site for greater than 90 days. I am enclosing a copy of Parts 261.2, 261.6, 262.34 and the regulation for hazardous waste storage in tanks for your information.

Sincerely,

James R. Berlow, Chief  
Treatment Technology Section  
Office of Solid Waste

Enclosures

cc: Matthew Straus, Chief  
Waste Characterization Branch