

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

> OFFICE OF LAND AND EMERGENCY MANAGEMENT

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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 <u>2016 Hazardous Waste Generator Improvements Rule</u>, 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 <u>Hazardous Waste Generator Regulations Crosswalk webpage</u>.

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.

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HOTLINE QUESTIONS AND ANSWERS

February 1996

1. Frequently Asked Questions on the 40 CFR Part 264/265, Subpart CC Air Emission Standards

Are large quantity generators subject to the RCRA Subpart CC air emission standards for tanks, surface impoundments, and containers?

Yes, large quantity generators are subject to the Subpart CC air emission standards if managing hazardous waste in 90-day accumulation units (262.34(a)).

Does Subpart CC affect containers used for satellite accumulation under 262.34(c)?

Subpart CC does not apply to containers used for satellite accumulation (59 <u>FR</u> 62896, 62910; December 6, 1994).

Are large quantity generators subject to the Subpart AA and BB air emission standards for process vents and equipment leaks?

Yes, in addition to establishing the Subpart CC air emission standards, the December 6, 1994, <u>Federal Register</u> also extended the applicability of Subparts AA and BB to large quantity generators accumulating hazardous waste in permit-exempt units (262.34(a)).

Do the Subpart CC regulations specify the types of control equipment that must be installed to comply with the air emission standards?

The Subpart CC standards do not require the use of any specific type of equipment or add-on control device. Instead, the standards allow owners/operators the flexibility of choosing a control device that is best suited for a particular wastestream (59 <u>FR</u> 62896, 62918; December 6, 1994).