



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 [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 black ink that reads "Jessica Young". The signature is written in a cursive, flowing style.

Jessica Young
Chief of the Recycling and Generator Branch
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9441.1996(01)

HOTLINE QUESTIONS AND ANSWERS

February 1996

2. Conditionally Exempt Small Quantity Generators Treating in Elementary Neutralization Units

A conditionally exempt small quantity generator (CESQG) may treat or dispose of hazardous waste on site provided the generator meets certain requirements outlined in 40 CFR 261.5(f)(3) and (g)(3). If a CESQG chooses to treat waste in an on-site elementary neutralization unit, must the generator meet the conditions of 261.5(f)(3) and (g)(3)?

A CESQG may treat hazardous waste in an on-site elementary neutralization unit without meeting the requirements in 261.5(f)(3) and (g)(3). Elementary neutralization units, as defined in 260.10, are exempt from RCRA treatment, storage, and disposal standards and permitting requirements. The elementary neutralization unit exclusion does not preclude a CESQG from treating waste in the exempt unit as long as the generator meets the criteria outlined in 264.1(g)(6), 265.1(c)(10), and 270.1(c)(2)(v). Specifically, the elementary neutralization unit must meet the definition of a container, tank, tank system, transport vehicle, or vessel; and be used for neutralizing wastes that are hazardous only because of corrosivity characteristic.