

## WHAT'S NEW?

The document called RCRA Subtitle C Instructions and Forms consolidates the instructions and forms for the Notification of RCRA Subtitle C Activities (Site Identification Form), Hazardous Waste Report, and the RCRA Hazardous Waste Part A Permit Application. The RCRA Subtitle C Instructions and Forms supersedes all other documents related to RCRA Subtitle C reporting as listed above.

This document highlights the changes from the previous instructions and forms.

## RCRA SUBTITLE C IDENTIFICATION FORM

### MANAGING HAZARDOUS WASTE PHARMACEUTICALS UNDER 40 CFR 266 SUBPART P

40 CFR Part 266, Subpart P is mandatory for the management of hazardous waste pharmaceuticals at all healthcare facilities (except healthcare facilities that are VSQGs) and reverse distributors. The rule is effective at the federal level on August 21, 2019. Authorized States have until July 1, 2021 to adopt this rule. When the rule is effective in your State, healthcare facilities and reverse distributors **must** notify EPA of these pharmaceutical activities using the Site ID Form. If a healthcare facility that is a VSQG chooses to operate under Subpart P, it also must notify using the Site ID Form. A healthcare facility that is co-located within a larger facility that is not a healthcare facility (e.g., a clinic at a military base, school, or manufacturer), must notify that it is operating as a healthcare facility under 40 CFR Part 266, Subpart P, unless the entire site is a VSQG. Information regarding facilities managing hazardous waste pharmaceuticals under 40 CFR 266 Subpart P is captured in Item 11.D of the Site Identification Form.

### HAZARDOUS SECONDARY MATERIALS

Item 16.B has been removed from the Site Identification Form. This item captured if you were notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that were not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling was still legitimate.

The definitions of HSM Facility Codes have been revised as follows:

- 07 – Reclaimer receiving HSM from off-site. This code applies if you reclaim hazardous secondary material received from an off-site hazardous secondary material generator or other facility and you certify that you have financial assurance per 40 CFR 260.42.
- 08 – Intermediate facility receiving HSM from off-site. This code applies if you receive hazardous secondary material from an off-site hazardous secondary material generator or another facility, you store it for more than ten days, and you certify that you have financial assurance per 40 CFR 260.42. This code does not apply if you generate or reclaim the hazardous secondary material.
- 09 – HSM Generator exporting HSM to a foreign entity for reclamation. This code applies if you generate and plan to send hazardous secondary material for reclamation to a foreign entity for reclamation and will meet the notice and consent procedures in 40 CFR 261.4(a)(25).

- 10 – HSM Generator importing HSM from a foreign entity to send to another U.S. facility for reclamation. This code applies if you import hazardous secondary material from a foreign entity and send the material to a different U.S. reclamation facility.
- 11 – HSM Generator importing HSM from a foreign entity for reclamation. This code applies if you import hazardous secondary material from a foreign entity and reclaim the material at your facility.

The following HSM Facility Codes have been inactivated:

- 17 - Variance for HSM transferred for reclamation and managed at a verified reclamation facility
- 18 - Variance for HSM transferred and managed at a verified intermediate facility
- 19 - Variance for HSM imported and managed at a verified reclamation facility

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## OTHER REVISIONS

Item 10.A.3 has been removed from the Site Identification Form. This item captured if you were a generator of mixed waste (waste that was both hazardous and radioactive).

## HAZARDOUS WASTE REPORT

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### GM FORM

Item 1.D – Country has been added to the Generation and Management (GM) Form. If you are reporting Source Code G62 (received hazardous waste from a foreign country), you must also specify the country from which the hazardous waste was imported.

Item I.G – Radioactive Mixed Waste has been added to the Generation and Management (GM) Form to capture if a hazardous waste is mixed with nuclear sources, special nuclear, or by-product material.

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## SOURCE CODES

The source code, G62, has been activated with the following definition:

- G62 – Hazardous Waste Received from a Foreign Country

As a result of activating the 'G62' source code, the following source codes are being inactivated:

- G63 – Hazardous Waste Received From Antarctica
- G64 – Hazardous Waste Received From Aruba
- G65 – Hazardous Waste Received From Bahamas
- G66 – Hazardous Waste Received From Belgium
- G67 – Hazardous Waste Received From Brazil
- G68 – Hazardous Waste Received From Canada
- G69 – Hazardous Waste Received From Holland
- G70 = Hazardous Waste Received From Malaysia
- G71 – Hazardous Waste Received From Mexico

- G72 – Hazardous Waste Received From New Zealand
- G73 – Hazardous Waste Received From Taiwan
- G74 – Hazardous Waste Received From Venezuela
- G75 – Hazardous Waste Received From Other Foreign Country

Two new source codes, G76 and G77, have been added with the following definitions:

- G76 – Evaluated hazardous waste pharmaceuticals accumulated by a reverse distributor
- G77 – Airbag waste received from airbag waste handlers exempted under 40 CFR 261.7(j) prior to arrival at the airbag collection facility or designated facility

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## FORM CODES

One new form code, W006, has been added with the following definition:

- W006 – Airbag waste (airbag modules or airbag inflators managed as hazardous waste)

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## MANAGEMENT METHOD CODES

Four new management method codes have been added with the following definitions:

- H011 – Mercury recovery (include mercury retorting, bulb/lamp crushing and mercury vapor recovery, thermostat recovery, mercury from medical equipment recovery, mercury car switch recovery, etc.)
- H015 – Deployment/deactivation of airbag waste followed by metals recovery
- H041 – Open burning/open detonation (should be permitted under Subpart X with process code X01)
- H090 – Polymerization (LDR standard as treatment method)