Executive Summary

US EPA’s Hazardous Waste Generator Improvements Rule took effect in May 2017, adding both new RCRA requirements and new reliefs for facilities that store hazardous waste on-site.

Prepared by hazardous waste training leaders Lion Technology Inc., this report covers what’s happened since the new hazardous waste rules took effect: Which states have adopted the new rules, when the remaining states must adopt critical changes, and how rising RCRA penalties will impact all hazardous waste generators in 2018.

To learn the new RCRA rules now, check out RCRA update training options on Page 6 of this report.
In Effect Now: New RCRA Hazardous Waste Rules

Major changes to US EPA’s RCRA hazardous waste storage and management requirements—created by US EPA’s “Hazardous Waste Generator Improvement Rule”—took effect about nine months ago.

Before the new RCRA rules took effect, Lion shared a report that highlighted the 3 biggest changes for generators and provided answers to other frequently asked compliance questions.

What’s Next?

Of course, the creation and implementation of new environmental regulations is a marathon, not a sprint. Still, as facilities wait for each state to adopt certain provisions of the Final Rule, the world of hazardous waste keeps spinning.

In this report, we’ll provide updates on what’s new since the Final Rule “took effect” on the Federal level.

Next page: Generator Improvements Rule? What’s That?
Generator Improvements Rule? What’s That?

If you’re new to hazardous waste management or if you’ve been living in a 55-gallon drum for two years, you may not yet know about EPA’s major changes to the hazardous waste program.

EPA’s Hazardous Waste Generator Improvements Rule was finalized in 2016, and aims to simplify the RCRA hazardous waste compliance requirement and make the 40 CFR generator rules more “user-friendly.”

Among the changes are major updates, which include:

- Complete re-organization of the generator standards in 40 CFR Part 262;
- Expanded marking and labeling rules for hazardous waste containers and tanks;
- Subjecting hazardous waste satellite areas to certain RCRA emergency preparedness requirements; and
- A one-time relief of “episodic generation” for facilities that experience a one-time even that may impact generator status, i.e. a big spill or a tank cleanout.

For more about these major RCRA updates, visit Lion.com/RCRA

Next page: What’s happened since the Generator Improvements Rule was finalized?
What’s New Since the New RCRA Rules Took Effect?

Rising hazardous waste penalties

A lot has happened since the new hazardous waste rules took effect on May 30, 2017. For one thing, EPA increases civil penalties for RCRA compliance mistakes. The maximum civil penalty under EPA’s hazardous waste program rose to $72,718 earlier this year.

When EPA penalties rise, the value of effective EH&S compliance rises too.

Electronic Hazardous Waste Manifests (e-Manifests)

Second, EPA is preparing to launch its new Electronic Hazardous Waste Manifest (e-Manifest) system in June 2018. Generators now have a choice—switch to the electronic format or continuing using paper Manifests. Understanding the potential costs and benefits is crucial to make the right choice for your site moving forward.

More about e-Manifests.
When Will New RCRA Rules Hit My State?

As of February 16, 2018, seven states had adopted part or all of US EPA’s major RCRA update:
- Alaska
- Iowa
- New Jersey
- Pennsylvania
- Georgia
- Utah
- Kentucky

The new RCRA rules are also in effect in Puerto Rico, the US Virgin Islands, the Northern Mariana Islands, American Samoa, and on Federal Tribal land.

When Will More States Adopt?

States have until May 31, 2018 to adopt new Federal rules that are more stringent than current state rules. As for Federal requirements that add new reliefs or relax the RCRA rules, states can choose to adopt those—or not.

States that require changes to State law to adopt new hazardous waste requirements have 2 years—until May 31, 2019—to update the more stringent updates.

Learn the New RCRA Rules. Nationwide or Online Anytime, Anywhere.

Join expert Lion instructors for in-depth training on the latest requirements for hazardous waste generators—large, small, and very small. The RCRA Hazardous Waste Management Workshop is presented nationwide.

2018 RCRA Training Workshops

March 5–6 Phoenix, AZ
March 8–9 Denver, CO
March 12–13 Salt Lake City, UT
March 12–13 Portland, OR
April 23–24 Grand Rapids, MI
April 25–26 Chicago, IL
April 30–May 1 St. Louis, MO

May 2–3 Dallas, TX
May 7–8 Houston, TX
May 8–9 Pittsburgh, PA
May 14–15 Cleveland, OH
May 16–17 Detroit, MI
May 17–18 Cincinnati, OH
June 4–5 Portsmouth, NH

See the full 2018 schedule of live RCRA training events at Lion.com here.

Can’t join us live? Find convenient, trusted online training options to help you achieve and maintain compliance, protect personnel who handle hazardous chemicals, and defend your site against rising RCRA penalties.

RCRA Hazardous Waste Management Online

RCRA Hazardous Waste Management—Refresher Online
Building Confident Compliance Teams

Effective training is the key to a confident and productive work force. To help you and your team build a strong compliance program and understand the regulations that affect your business, Lion Technology designs training to empower as well as educate. Since 1977, two out of three Fortune 500 companies in manufacturing, chemical, and transportation—as well as Federal and State government agencies—have trusted Lion for expert training delivered by full-time instructors. At Lion’s nationwide, interactive workshops, industry professionals get the knowledge and tools to succeed, and keep their sites in compliance.

Sometimes, you simply can’t leave your site for training. With online training at Lion.com, convenient courses for compliance managers, EHS professionals, engineers and shift workers are just a click away. Learn on your own schedule with interactive, 24/7 online courses or join a live webinar for guidance on critical regulatory topics and new rules. Bring an expert Lion instructor to your site to present training tailored to your employees’ needs. Lion can present any of our public workshops privately for your group, or help you build a hazmat shipping, RCRA hazardous waste, workplace safety, or environmental training program that’s right for your team.

If you’re responsible for compliance with RCRA hazardous waste rules; 49 CFR, IATA, or IMO hazmat shipping standards; US EPA air, water, and chemical regulations or OSHA workplace safety mandates, visit Lion.com now to see how effective, engaging training can simplify your responsibilities and make it easier to comply with the complex rules that affect your job.

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