



GENERATOR IMPROVEMENT RULE – PHASE 1

Guidance Document – Small Quantity Generators

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Introduction

The Generator Improvements Rule (GIR) aims to enhance environmental protection and provide greater flexibility for hazardous waste generators. This document provides a clear overview of the changes to the California Code of Regulations (CCR) effective July 1, 2024, and how they impact your operations. This document is intended to be a helpful guide, but it is not a substitute for applicable laws and regulations.

Re-Organization

Main reorganizational changes to hazardous waste generator regulations. The location of the following definitions has moved to the locations described below:

Previous Location	Description	New Locations
Section 66262.34	Hazardous waste counting	Section 66262.13
	Satellite accumulation area (SAA)	Section 66262.15
	Conditions for exemption for small quantity generator (SQG)	Section 66262.16
	Conditions for exemption for large quantity generator (LQG)	Section 66262.17
Section 66262.12	ID Number and re-notification	Section 66262.18
Articles 3 and 4 of Chapter 15	Preparedness, prevention, and emergency planning procedures	Article 9 in Chapter 12

New and Amended Definitions – 22 § CCR 66260.10

There are new and amended definitions:

New Definitions	Amended Definitions
<p>Central Accumulation Area (CAA): Replaces the terms "90-day" and "180-day" storage areas.</p>	<p>Small quantity generator (SQG): Specifies waste types and clarifies counting for different hazard categories.</p>
<p>Non-acute hazardous waste: Specifies wastes that are not acutely or extremely hazardous.</p>	
<p>Large Quantity Generator (LQG): Definition was previously commonly understood but now is defined. LQG generates greater than or equal to the following in a calendar month: 1000 kg or 2,200 lbs. of hazardous waste; greater than or equal to 1 kg or 2.2 lbs. of acute hazardous waste.</p>	<p>Acutely hazardous waste: Clarifies the criteria based on federal listing and hazard codes.</p>
<p>Very Small Quantity Generator (VSQG): Formally known as Conditionally Exempt Small Quantity Generator (CESQG). VSQG generates less than or equal to the following amounts in a calendar month: 100 kg or 220 lbs. of hazardous waste; 1 kg or 2.2 lbs. of acute hazardous waste.</p>	

Generator Category Determination – 22 CCR § 66262.13

Accounts for the quantity of acute, extremely hazardous, and non-acute hazardous waste generated, affecting how generators classify themselves (LQG, SQG, VSQG).

Generators	Acute Hazardous Waste	Extremely Hazardous Waste	Non-Acute Hazardous Waste
LQG	> 1 kg	Any amount	Any amount
LQG	Any amount	> 1 kg	Any amount
LQG	Any amount	Any amount	≥ 1,000 kg
SQG	≤ 1 kg	≤ 1 kg	< 1,000 kg
VSQG	≤ 1 kg		≤ 100 kg

Re-Notification – 22 CCR § 66262.18(d)(1) & (d)(2)


Generators of Resource Conservation Recovery Act (RCRA) hazardous waste must re-notify the Department of Toxic Substances Control (DTSC) / Environmental Protection Agency (EPA) of generator status using EPA Form 8700-12:

- RCRA SQG's:** Starting September 1, 2024, and every four (4) years thereafter. *SQGs may submit the re-notification form at any time during the four years leading up to the deadline, as long as the information remains accurate.*

Generators must use [U.S EPA's RCRAInfo system](#) to submit re-notifications to DTSC/EPA.

**Note this requirement does not apply to RCRA VSQG's and/or generators of Non-RCRA hazardous waste.*

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM



1. Reason for Submittal (Select only one.)


<input type="checkbox"/>	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility, a reverse distributor, and/or generator of > 1,000 kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input type="checkbox"/>	Submitting a new or revised Part A (permit) Form

2. Site EPA ID Number

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3. Site Name

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RCRAInfo Sign In

User Id 🗕

Password 🗕

Sign in

**The annual electronic Verification Questionnaire (eVQ) is separate from the re-notification requirement.*

For any questions regarding the renotification submission, please contact DTSC at myRCRAid@dtsc.ca.gov

Labeling and marking – 22 CCR § 66262.15(a)(5), 66262.16 (b)(4)

- In addition to existing requirements to mark or label containers and/or tanks with certain content, generators must also mark or label their tanks with an indication of the hazards of the contents.
- Generators must use inventory logs, hazardous waste label, monitoring equipment, or other records to demonstrate hazardous waste has exited the tank:
 - ✓ Within 180 days for SQG's

Examples of Acceptable Labels

Department of Transportation (DOT)



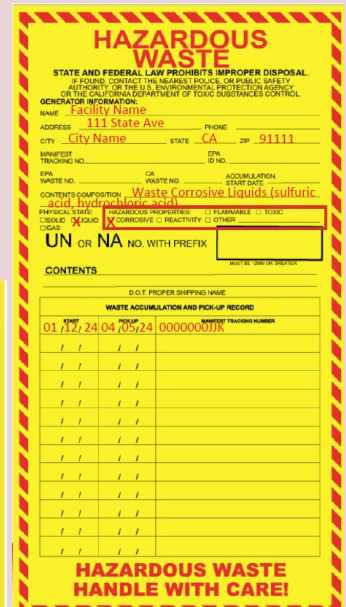
Occupational Safety and Health Administration (OSHA)



National Fire Protection Association (NFPA)



Hazardous Waste Label



Pre-Transportation Marking – 22 CCR § 66262. 32(b)

Prior to transporting hazardous waste or offering hazardous waste for transportation off-site, generators must mark their containers with the applicable EPA hazardous waste number(s) in addition to other existing requirements.

Incompatible Wastes in Satellite Accumulation Areas (SAA) – 22 CCR § 66262.15 (a)(3)

The requirements for handling incompatible wastes in satellite accumulation areas now match those longstanding rules for handling incompatible wastes in other/central accumulation areas (CAA).

- Incompatible wastes/materials must not be placed in the same container.
- Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste/material.
- Containers holding hazardous waste that is incompatible with nearby wastes/materials must be separated from those materials or protected by barriers (*i.e. berm, dike, wall, another device*).
- Preparedness, Prevention, and Emergency Procedures requirements now apply to all SAA (22 CCR 66262.16(b)(6) & (b)(7)).

Arrangements with Local Authorities – 22 CCR 66262.16(b)(6)(F)(2)

All generators must attempt to make arrangements for the mitigation of emergencies with its local fire department, as well as any other organization necessary to respond to an emergency. Examples of other agencies include:

- Police Department(s)
- Other Emergency Response Team(s)
- Emergency Response Contractor(s)
- Equipment Supplier(s)
**i.e. Spill equipment and PPE suppliers, monitoring equipment companies, HW tank/container companies, etc.*
- Local Hospital(s)

**Submitting a full Hazardous Materials Business Plan (HMBP) (Facility Information, Inventory, Emergency Response Plan sections) in the California Environmental Reporting System (CERS) may fulfill the requirement to arrange with local authorities if emergency responders can access it, but generators must ensure responders are aware of and can access the HMBP information in CERS.*

References:

- [Generator Improvement Rule FAQ](#)
- GIR Website:
<https://dtsc.ca.gov/generator-improvements-rule/>
<https://dtsc.ca.gov/regs/gir/>
- [Title 22 of California Code of Regulations \(CCR\)](#)