



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  
Office of Resource Conservation and Recovery

9453.1988(02)

## RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JANUARY 88

### 2. "Lab Packs" at Generator Sites

Is a permit required for a service company (under contractual agreement to manage a generator's hazardous waste) to come onto a generator's site and re-package small containers of hazardous waste into large containers with absorbents?

A generator may accumulate wastes pursuant to Section 262.34, and nothing in Section 262.34 precludes a generator from treating waste when it is in an accumulation tank or container provided that the performance standards under Subparts I and J of Part 265 are met (51 FR 10168), and provided that the treatment is not thermal treatment or incineration which are subject to Part 265 Subpart P and O respectively. Further, the addition of absorbent material to waste in a container or the addition of waste to a container holding absorbent material also is exempt from permitting in accordance with Section 265.1(c)(13). Because a service company may act on behalf of the generator, a permit would not be required for a service company to re-containerize the wastes and/or add absorbent material prior to shipping off-site. The Agency's current policy on treatment at a generator facility is that treatment often renders waste less hazardous or at least easier to transport or more amenable for recovery. For these reasons, EPA considers that such treatment is not only allowable under §262.34, but treatment is consistent with sound waste management (memo, dated 12/15/87, from Marcia Williams to Robert Greaves).

Source: Mike Petruska (202) 475-8551

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