

Generator Improvements Rule (GIR)

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February 2026

HISTORY

- May 30, 2017 US EPA's Hazardous Waste (HW) Generator Improvement Rule (GIR) went into effect
 - Re-organized and consolidated HWG Regs
 - Provided greater flexibility to generators
 - Identified regulatory gaps
 - Clarified aspects of the HWG program

CALIFORNIA IS AN AUTHORIZED STATE

- DTSC is the primary authority enforcing the RCRA HW requirements in CA
- As an authorized state, CA is required to adopt revisions that are more stringent than current state standards

PHASES OF IMPLEMENTATION

- Phase I:
 - Mandatory provisions, reorganization, & clarification
 - Effective July 1, 2024
- Phase II:
 - Optional provisions
 - **Currently in rulemaking**

RE-ORGANIZATION

Existing Location	Description	New Location
Section 66262.34	Hazardous Waste Counting	Section 66262.13
	Satellite Accumulation Areas (SAA)	Section 66262.15
	Conditions for exemption for SQGs	Section 66262.16
	Conditions for exemption for LQGs	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 Ch. 12

DTSC CROSSWALK FOR GIR

- [DTSC-Crosswalk-Generator-Improvements-Rule-6.4.2024-2.pdf](#)

Definitions, Variances and Miscellaneous Regulations				
Regulation	Old CFR Citation	New CFR Citation	Old CCR Citation	New CCR Citation
<i>Definition of LQG</i>	N/A	260.10	N/A	66260.10
<i>Definition of SQG</i>	260.10	260.10	66260.10	66260.10
<i>Definition of Non-Acute Hazardous Waste</i>	N/A	260.10	N/A	66260.10
<i>Definition of Central Accumulation Area</i>	N/A	260.10	N/A	66260.10
<i>Definition of VSQG</i>	N/A	260.10	N/A	66260.10
<i>Variances: Factors for Petitions to Include Other Wastes Under Chapter 23</i>	N/A	N/A	66260.23	66260.23
Identification Numbers for the Generator	262.12	262.18	66262.12	66262.18

NEW AND REVISED DEFINITIONS

New Definitions	Revised Definitions
<ul style="list-style-type: none">• Central Accumulation Area (CAA)• Non-acute hazardous waste• Large Quantity Generator• Very Small Quantity Generator	<ul style="list-style-type: none">• Small quantity generator• Acutely/Acute Hazardous Waste

NEW DEFINITIONS

- **Non-acute Hazardous Waste:**
 - Serves to specify that HW which are **not** “Acute hazardous waste” or “extremely hazardous waste” are... non-acute hazardous waste
 - Done to aid with determining HWG status

ACUTE VS EXTREMELY HAZARDOUS WASTE

- Acutely Hazardous Waste:
 - HW that meet the listing criteria in 40 CFR § 261.11(a) and therefore listed in 22 CCR § 66261.31 with assigned HW code **(H)** *or*
 - Are listed in 22 CCR § 66261.33(e)
 - Includes “P-List” and six dioxin-bearing wastes in the “F-List”
 - Criterion:
 - Separates acute HW from other toxic wastes (U-listed)
 - Established management method for containers that held P-listed wastes

ACUTE VS EXTREMELY HAZARDOUS WASTE

- Extremely Hazardous Waste:
 - Any HW or mixture of HW which, if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the HW or mixture of HW due to its quantity, concentration, or chemical characteristics
 - More of a “CA Thing”
- Appendix X in 22 CCR
- Based on following criteria:
 - Acute oral toxicity
 - Acute dermal toxicity
 - Acute inhalation toxicity
 - Carcinogenicity
 - Experience or testing
 - Water reactive
 - Bioaccumulative

NEW DEFINITIONS

- **Very Small Quantity Generator (VSQG) § 66260.10:**
 - Adopted Federal term
 - *Formally known as CESQG*
 - A generator who generates \leq the following in a calendar month:
 - **100 kg** (220 lbs.) of **non-acute HW**; and
 - **1 kg** (2.2 lbs.) of **acute HW** (§ 66261.31 or § 66261.33(e))

NEW DEFINITIONS

- Large Quantity Generator (LQG) § 66260.10:
 - Previously commonly understood but never *officially defined* in **State** Regulations
 - A generator who generates any of the following amounts in a calendar month:
 - $\geq 1,000$ kg (2,200 lbs.) of **non-acute HW**; or
 - ≥ 1 kg (2.2 lbs.) of **EHW**

NEW DEFINITIONS

- **Central Accumulation Area (CAA):**
 - Refers to any area previously referred to as “90-day” or “180-day” waste accumulation areas
 - Any on-site HW accumulation area with HW accumulating in units subject to SQG or LQG standards

REVISED DEFINITIONS

- **Small Quantity Generator (SQG):**
 - Specifies the **types of HW** and associated count to aid in determining HWG status
 - A generator who generates the following amounts in a calendar month:
 - **<1,000 kg** (2,200 lbs.) of **non-acute HW**; and
 - **≤1 kg** (2.2 lbs.) of **acute HW**
 - **≤1 kg** (2.2 lbs.) of **EHW**

GENERATOR CATEGORY DETERMINATION

Generator	AHW/calendar month	EHW/calendar month	Non-Acute HW/calendar month
LQG	> 1kg	Any amount	Any amount
LQG	Any amount	> 1kg	Any amount
LQG	Any amount	Any amount	≥ 1,000 kg
SQG	≤ 1kg	≤ 1kg	< 1,000 kg
VSQG	≤ 1kg	≤ 1kg	≤ 100 kg




Calendar month: The period from the same date of one month to the same date of the next month. Duration can vary, consisting of 28 – 31 days.

NEW REQUIREMENTS – RENOTIFICATION

- § 66262.18
 - HWGs are required to re-notify to EPA/DTSC
 - Only applies to RCRA SQGs and LQGs
 - RCRA Subtitle C (Site Identification Form) aka EPA Form 8700-12

OMB# 2050-0024; Expires 04/30/2024

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
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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 $\geq 1,000$ 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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4. Site Location Address

Street Address			
City, Town, or Village		County	
State	Country	Zip Code	
Latitude	Longitude	<input type="checkbox"/> Use Lat/Long as Primary Address	

5. Site Mailing Address Same as Location Street Address

Street Address			
City, Town, or Village			
State	Country	Zip Code	

6. Site Land Type

<input type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
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7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

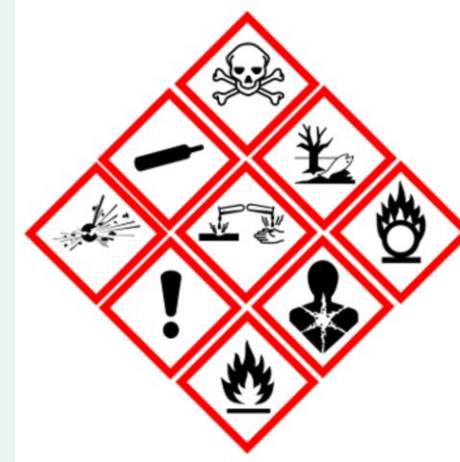
NEW REQUIREMENTS - RENOTIFICATION

When to Re-Notify	
<p>SQGs:</p> <ul style="list-style-type: none">• Initial re-notification to DTSC: Required starting 2024• Frequency: Every four years• Due date: September 1st year which re-notification is required	<p>LQGs:</p> <ul style="list-style-type: none">• Initial re-notification to DTSC: Required even numbered years, starting 2026• Frequency: Every two years• Due date: March 1st year which re-notification is required• *Can be submitted as part of the Biennial Report

eVQ can't be used for re-notification purposes

NEW REQUIREMENT – LABELING AND MARKING

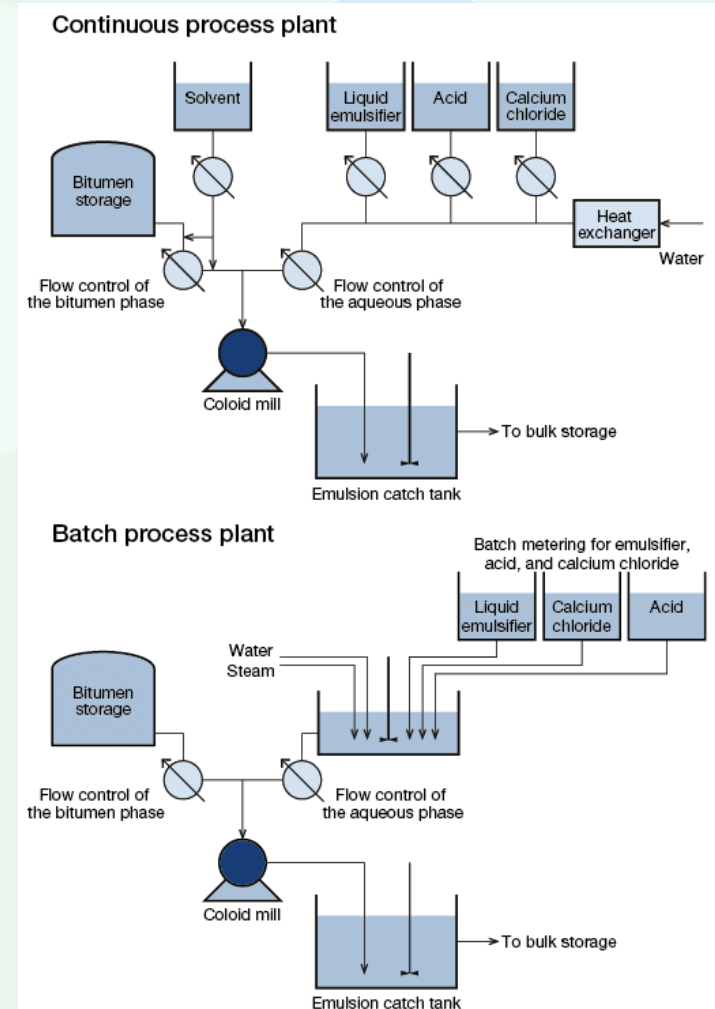
- Applies to all HWGs
- 3 New **Tank** labeling and marking RQs:
 1. Generators must mark or label tanks with an **indication of the hazards of the contents**
 - GHS pictograms, NFPA placards, DOT diamonds



Health Hazard 4 Deadly 3 Extreme Danger 2 Hazardous 1 Slightly Hazardous 0 Normal Material	Fire Hazard Flash Points Below 73° F 4 Below 100° F 3 Between 100° F and 200° F 2 Above 200° F 1 Will Not Burn 0
Specific Hazard ACID - Acid ALK - Alkali COR - Corrosive OXY - Oxidizer ☢ - Radioactive ☞ - Do Not Use Water	Reactivity May Detonate 4 Shock/Heat May Detonate 3 Violent Chemical Change 2 Unstable if Heated 1 Stable 0

NEW REQUIREMENT – LABELING AND MARKING

2. HWGs must use inventory logs, monitoring equipment, or other records to ensure timely disposal of HW and demonstrate that:
- For tanks using a **batch process**, HW has been emptied within the applicable time period (i.e., 180 days, 90 days)
 - For tanks with **continuous flow process**, demonstrate that estimated volumes of HW entering the tank daily exit the tank within the applicable time period



NEW REQUIREMENT – LABELING AND MARKING

3. Generators must keep inventory logs or records on site and readily available for inspection
 - Logs must include details on the HW type, quantity, and storage dates.
 - HWGs must retain inventory logs or records for HW tanks for **at least 3 years** from the date the waste is first accumulated
 - Inventory logs, monitoring equipment, or shipping papers, i.e. manifests or consolidated manifest receipts

Per DTSC, checking the box on a HW label should meet the new marking RQs

NEW REQUIREMENTS – SPECIAL CONDITIONS FOR IGNITABLE OR REACTIVE WASTES

- Who: LQGs
- Must take precautions to prevent accidental ignition or reaction
 - Waste must be **separated** from any sources of ignition such as flames, heat, sparks, etc.
 - When handling ignitable or reactive waste, LQGs must **confine smoking and open flames to certain areas**
 - **“No Smoking” signs** must be placed near ignitable/reactive waste



NEW REQUIREMENTS – PRE-TRANSPORTATION MARKING

- § 66262.32(b)
- Who: All HWGs
- Prior to shipment, all containers must be marked with:

Existing

1. HAZARDOUS WASTE – State & Federal Law Prohibit Improper Disposal. If found, contact the nearest police or public safety authority, the U.S. Environmental Protection Agency or DTSC
2. HWG Name and Address
3. HWG EPA ID
4. Manifest Tracking Number
5. **U.S. EPA HW Number(s)**
 - *Aka hazardous waste codes (ex. D008 for lead)*

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY
OR THE CALIFORNIA DEPARTMENT OF HEALTH SERVICES

GENERATOR INFORMATION

NAME _____
ADDRESS _____ PHONE _____
CITY _____ STATE _____ ZIP _____
EPA / MANIFEST ID NO. / DOCUMENT NO. _____ / _____
EPA WASTE NO. _____ CA WASTE NO. _____ ACCUMULATION START DATE _____

CONTENTS COMPOSITION _____

PHYSICAL STATE _____ HAZARDOUS PROPERTIES FLAMMABLE TOXIC
 SOLID LIQUID CORROSIVE REACTIVITY OTHER _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WMCA6

NEW REQUIREMENTS – LQG **FACILITY** CLOSURE REQUIREMENTS

- § 66262.17(a)(8)(B)
- Who: RCRA LQGs only
- Closure notification RQ's:
- **Notify DTSC** using EPA Form 8700-12
- When: at least **30 days prior** to closing facility
 - Can request additional time, but must submit request within 75 days after initial date provided
- Within **90 days after** closing facility
- If unable to comply with closure standards (66262.17(a)(8)(C) or (D), must notify using form 8700-12 that facility is closing as a landfill (66265.310 or 66265.445(b))

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

<input type="checkbox"/> Y <input type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. <input type="checkbox"/> Central Accumulation Area (CAA) or <input type="checkbox"/> Entire Facility	
B. Expected closure date: _____ mm/dd/yyyy	
C. Requesting new closure date: _____ mm/dd/yyyy	
D. Date closed : _____ mm/dd/yyyy	
<input type="checkbox"/>	1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)
<input type="checkbox"/>	2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

NEW REQUIREMENTS – LQG **FACILITY** CLOSURE RQ'S

LQG Site Closure Notification in HWTS

Handler Reports

1	Handler Search (Advanced)	Search for a Handler by ID Number, name, address, status, ID Type, etc.
2	Transporter Profile	Search for a Transporter by name, address, registration number, or status to view Transporter Registration details.
3	Hazardous Waste Handler Summary	Provides a Manifest Summary, Tonnage by Waste Code and Tonnage by Method Code for a specified ID Number and year.
4	Large Quantity Generators	Provides a list of Large Quantity Generators (LQGs) per year with their qualifying month and tonnage, aggregated from data acquired from manifests.
5	Entity Association with a Specific Waste	Provides a list of ID Numbers and the amount of waste in tons handled for a specified year, waste code, and entity type.
6	Tanner Report	Provides Generator and Receiving Facility information with a summary of Hazardous Waste Manifest data for a specified year.
7	Tanner Report (CDTFA)	This report consists of summary and tonnage information for active hazardous waste generators during a specified year. Includes Manifests containing Chemicals of Interest.
8	Entities Which Interface	Provides a list of hazardous waste handlers which interfaced with a specified ID number within a specified date range. The report returns entity type, ID number, name, county, manifest count, and total tons.
9	Quarterly ID Number Export (CDTFA)	Provides a fixed width text file of ID numbers issued within a specified date range.
10	Notification of LQG Site Closure	Provides a list of LQGs which have site closure notifications

NEW REQUIREMENTS – LQG **FACILITY** CLOSURE RQ'S

ID Number **City** **Cities to Exclude** [?](#)

County **Closure Type** **Expected Closure From** **Expected Closure To**

Date Closed From **Date Closed To**

1 Record

EPA ID	Closure Type	Expected Closure Date	New Closure Date	Date Closed	Handler Name	Street
CAD983637471	EF	08/30/2024	10/02/2024	10/02/2024	LOS ANGELES TIMES COMMUNICATIONS L L C	2000

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NEW REQUIREMENT – LQG **UNIT** CLOSURE RQ'S

- Must meet one of the following closure conditions:
 1. Place a notice in the operating record w/in 30 days of closure of the container; or
 2. Meet closure performance standards as follows:
 - HWG must minimize the need for further maintenance to protect human health and the environment.
 - Remove or decon all contaminated equipment, structures, soil and HW residues
 - Any HW generated during closure must be managed w/in 90 days
 - If any contaminated soils and wastes can't be removed or deconned, the waste accumulation unit is considered a landfill
 - HWG shall perform post-closure care landfill RQs (§ 66265.310)
 3. Follow the facility closure notification procedures

Applies to LQGs: RCRA and non-RCRA

NEW REQUIREMENT – INCOMPATIBLE WASTES IN SATELLITE ACCUMULATION AREAS (SAA)

- § 66262.15(a)(3)
 1. Incompatible waste/materials must not be placed in the same container
 2. HW must not be placed in an unwashed container that previously held an incompatible waste/material
 3. A container holding an incompatible waste/material must be **separated** from the other materials or wastes by any practical means (e.g. dike, berm, wall, etc.)

NEW REQUIREMENT – ARRANGEMENT WITH LOCAL AUTHORITIES

- § 66262.16(b)(6)(F) & § 66262.256 – SQGs & LQGs
- “*Attempt*” to make arrangements with local authorities (i.e., PDs, FDs, local hospitals, LEPC?, etc.)
 - *HMBP Submission may satisfy this RQ*
- Shall document in *operating records* attempts to make arrangements with local authorities, if agencies decline to enter into such arrangements
 - Operating record – refers to a set of records maintained at generator facility.

NEW REQUIREMENT – QUICK REFERENCE GUIDE (QRG)

- § 66262.262(b)
 - **LQGs only**
 - *Currently* applies to *new* LQGs only, “LQGs that first become subject to provisions after 7/1/2024...”
 - Existing LQGs must develop QRG when revising contingency plans
 - DTSC has provided a template
 - **LQG Contingency Plan template does not meet QRG RQs**




NEW REQUIREMENT – QUICK REFERENCE GUIDE (QRG)

- Required Elements of QRG:
 1. Types/names of HW and associated hazards
 2. Maximum amount of each HW
 3. ID of any HW where exposure would require unique or special treatment
 4. Map of facility showing where HW are generated, accumulated, treated and routes for accessing these wastes
 5. Street map of the facility in relation to surrounding businesses, schools, residential areas
 6. Locations of water supply
 7. ID of onsite notification systems (e.g., fire alarm, smoke alarms)
 8. Name of emergency coordinator(s) and 24/7 emergency telephone number

HMBP ERPs do not satisfy QRG RQs

NEW REQUIREMENT – QUICK REFERENCE GUIDE (QRG)

- DTSC has provided a template and instructions for LQGs to use as guidance
- [Contingency Plan QRG Template](#)

Department of Toxic Substances Control
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 P.O. Box 806
 Sacramento, California 95812-0806

Yana Garcia
 Secretary for
 Environmental Protection

Gavin Newsom
 Governor

This quick reference guide template was created by DTSC to be used as a guide to assist the regulated community with compliance. It does not substitute for or replace any regulatory requirements.
 An updated contingency plan and quick reference guide is required to be resubmitted when amended.
 Please note that treatment, storage, and disposal facilities (TSDF) and interim status facilities are not subject to quick reference guide requirements.

Contingency Plan Quick Reference Guide

Facility Name

Street Address

City, State, Zip

Facility Contacts (First Name, Last Name, 24/7 Emergency Number):

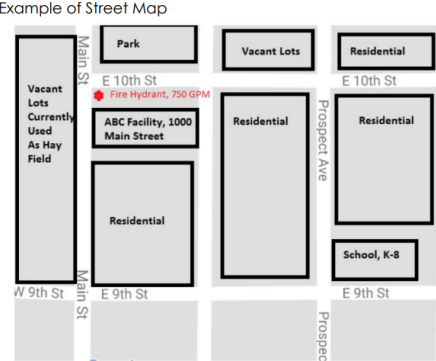
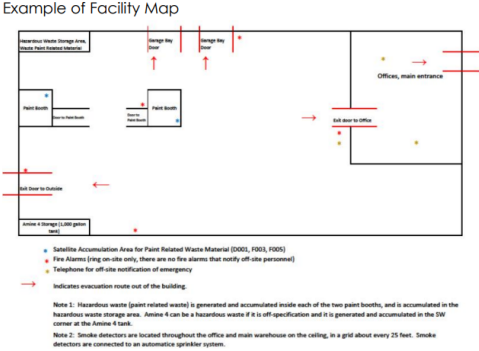
Primary Emergency Coordinator and phone number:

Secondary Emergency Coordinator and phone number:

Tertiary Emergency Coordinator and phone number:

MAP ATTACHMENTS

- 1. Include a map of the facility with the following marked:**
 - where hazardous wastes are generated, accumulated, and treated, and routes for accessing these wastes
 - the identification of on-site notification systems (e.g., fire alarms that rings off site and smoke alarms)
 - telephone locations that may be used for offsite notification of an emergency
 - the evacuation route(s) out of the building marked by red arrows
- 2. Include a street map of the facility in relation to the surrounding businesses, schools, and residential areas to understand how best to get to the facility and evacuate citizens:**
 - mark the locations of water supply (fire hydrants on the street that are accessible to emergency personnel)
 - mark the types of buildings surrounding the facility



WHAT THIS MEANS FOR STANISLAUS COUNTY

- Yes – we CAN issue GIR violations
- Buuutt... education first approach 😊

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	Name	Program	Description	Type #	Begin Date	End Date
View	General	RCRA Large Quantity Generator	RCRA Large Quantity Generator - Administration/Documentation - General	3110	10/1/2024	12/31/2099
View	RCRA: EPA ID Number	RCRA Large Quantity Generator	Failure to obtain or maintain an Identification Number prior to treating, storing, disposing of, transporting or offering for transportation any hazardous waste. Maintenance of ID numbers must be annu...	3110001	10/1/2024	12/31/2099
View	RCRA: Contingency Plan Emergency Action Plan	RCRA Large Quantity Generator	Failure to include all of the following in the Contingency Plan: description of actions personnel will take in response to a release or emergency, arrangements with local authorities, list of emergenc...	3110011	10/1/2024	12/31/2099
View	RCRA: Contingency Plan Copies	RCRA Large Quantity Generator	Failure to maintain a copy of the contingency plan and all its revisions at the facility and to submit a copy (including the Quick Reference Guide) to all local police departments, fire departments, ...	3110012	10/1/2024	12/31/2099
View	RCRA: New Hazardous Waste Tank System P.E. Certification	RCRA Large Quantity Generator	Failure to obtain and maintain a written assessment reviewed and certified by an independent, qualified, professional engineer prior to placing the tank system in service. The written assessment shall...	3110013	10/1/2024	12/31/2099
View	RCRA: New Tank Assessment Standards	RCRA Large Quantity Generator	Failure to include all required information in the new tank system assessment.	3110014	10/1/2024	12/31/2099
View	RCRA: Hazardous Waste Tank Equipment Replacement	RCRA Large Quantity Generator	Failure to obtain CUPA approval prior to the replacement of identical or functionally equivalent tank. The notification to the CUPA of replacement shall include the following: (1) Name, address, and ...	3110015	10/1/2024	12/31/2099
View	Reassessment for Hazardous Waste Tank System P.E. Certification	RCRA Large Quantity Generator	Failure of generator to obtain assessment or reassessment every five (5) years or the remaining service life of the tank system, as stated in the engineer's assessment, whichever is less. This assessm...	3110023	10/1/2024	12/31/2099
View	RCRA: Biennial ID Notification	RCRA Large Quantitv	Failure to maintain ID number by notifying DTSC by March 1 of each even numbered year. Re-notification must be	3110031	10/1/2024	12/31/2099

PHASE II AND OPTIONAL PROVISIONS

- Less stringent than CA's existing HW program
 1. New RQs allowing VSQGs to voluntarily send their HW to certain LQGs - *(40 CFR 262.14(a)(5)(vii) and 262.17(f))*
 2. Special RQ's for accumulating ignitable/reactive wastes for LQGs - *(20 CFR 262.17(a)(1)(vi))*
 3. New RQs for HWGs that temporarily change HWG status as a result of an episodic event – *(40 CFR 262 subpart L)*
 4. Addition of language to HW determination criteria – *(40 CFR 262.11)*
 5. Distinguishing between independent RQs and conditions for exemption – *(40 CFR 262.10(a) and (g))*
 6. Revisions to the SAA RQs for SQGs and LQGs – *(40 CFR 262.15)*
 7. Relocate conditions for exemption for VSQGs – *(40 CFR 261.5 – 40 CFR 262.14)*

REFERENCES

- GIR WEBSITE
 - [Generator Improvements Rule | Department of Toxic Substances Control](#)

QUESTIONS?¿

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- Cell (209) 232-9220