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**Questions & Answers from April 2019 Generator Improvement Rule Webinars**

Q: Will we receive a copy of this powerpoint?

A: **A copy of the PowerPoint is on NMED-HWB's website:**

<https://www.env.nm.gov/wp-content/uploads/2019/04/GIR-PPT-webinar-1.pdf>

Q: Is 50 foot waiver for all generator status or just VSQG?

A: **The 50-foot waiver only applies to LQGs. VSQGs do not have this requirement.**

Q: Do DOT regulations apply for xport for hazwaste VSQG consolidation?

A: **DOT regulations would apply for any hazardous waste transportation. Check with DOT for further guidance.**

Q: Does the labeling for the outer overpack container need to match the inner container?

A: **If this is in respect to the hazards, waste codes, and accumulation start date, yes.**

Q: For facilities that are both LQGs and TSDFs, can the agency provide guidance relative to the different requirements for the List of RCRA Emergency Coordinators (i.e., requirement for addresses/personal phone numbers required by 40 CFR 264, but not required by 40 CFR 262, Subpart M)?

A: **The facility would have to meet the requirements in 40 CFR 264 for the permitted units and 40 CFR 262, Subpart M for the CAAs.**

Q: For the Quick Reference Guide, what would be the appropriate radius for map showing nearby businesses, schools, hospitals, etc. if the facility is remote?

A: **There is no guidance for the radius.**

Q: Are these rules in effect now?

A: **Yes, since December 1, 2018.**

Q: If a VSQG has an episodic event and they exceed their 60-day period for disposal, how long will the new generator status (SQG or LQG) apply to the facility?

A: **The facility would need to meet the new generator requirements until the waste is transported off-site for disposal.**

Q: Is the information presented here same as USEPA requirements or does it also contain requirements unique to New Mexico?

A: **NMED adopted EPA's Generator Improvement Rule verbatim.**

Q: You said that the disposal of an "Excess chemical inventory" can be considered a Planned Episodic Event. So if a company is disposing of excess chemicals for the first time, will they be able to call this an episodic event?

A: **Yes, as long as the facility notifies 30 days prior to the planned event; however, that will count as the planned episodic event for that calendar year. If an unplanned event occurs, a petition would need to be submitted to NMED.**

Q: If label states flammable does is a pictogram required?

A: **A label identifying the hazard needs to be on the container. It doesn't have to be a pictogram. It can be a DOT placard label or NFPA diamond label. It also needs to be labeled "hazardous waste".**

Q: Regarding containers in SAAs -- do they not have to have the name of the chemicals/materials as well as the words "Hazardous Waste" and the hazardous characteristics?

A: **No, just the words hazardous waste, waste codes and hazardous labels**

Q: For episodic events, how would this be calculated in the Hazardous Waste fee in August?

A: **The GIR states the facility would not be considered the larger generator size, so the waste would not be included in the annual hazardous waste fees.**