

Generator Initiative Draft Agenda

- 9:00 - 9:10 Welcome, Introductions and Logistical Announcement (e.g., lunch alternatives)
- 9:10 - 9:20 Purpose and Goals - Jim O'Leary
- 9:20 - 9:30 Background on Generator Initiative Project - Jim O'Leary
- 9:30 - 9:40 RCRA Hazardous Waste Generator Regulatory Program Topics for Discussion:
Overview of categories and descriptions - Jim O'Leary
- Ground Rules for Public Meetings
- 9:40 - 10:10 What Areas of the Generator Program are Working Well?
- Is the existing hazardous waste generator program meeting its goals of protecting human health and the environment?
 - What parts of the program work effectively and why?
- 10:10 - 10:25 Break
- 10:25 - 12:00 How Can We Improve the Program Through the Use of Innovative Solutions and Improved Technical Assistance?
- What parts of the program can be improved? What are some workable solutions? What benefits would be derived from these potential solutions?
- See Attachment for Examples of Potential Areas of Discussion.**
- 12:00 - 1:00 Break for Lunch
- 1:00 - 2:00 How Can We Improve the Program Through the Use of Innovative Solutions and Improved Technical Assistance? (Continued)
- Are there any new management techniques; e.g., environmental management systems, or technologies; e.g., better use of information management systems, that lend themselves to improving the existing regulatory framework? What would be the benefits to the program if adopted?

- What, if any, state hazardous waste regulations, interpretations or implementation programs should EPA review and evaluate in order to improve or clarify the federal regulations?
- How can EPA and the states improve their compliance and technical assistance activities to hazardous waste generators?

2:00 - 2:15 Break

2:15 - 3:15 How Can We Improve the Program Through Better Performance Measures, Burden Reductions and Pollution Prevention/Recycling?

- What measures should the program use to most effectively capture the environmental benefits of the hazardous waste generator regulatory program?
- Are there areas where we can achieve further reporting/paperwork burden reduction while allowing EPA to measure environmental results?
- How can EPA encourage generators to practice pollution prevention and recycling?

3:15 - 4:15 What Should We Work on First?

- What is the one priority project you would like to see EPA undertake in the near future to improve the hazardous waste generator regulatory program?

4:15- 4:45 Additional Comments

4:45- 5:00 Next Steps - Jim O'Leary

- Public Meetings: 4 public meetings
- Encourage participants to submit written comments to the docket
- Analyze comments and consider appropriate actions (e.g., consider alternatives, develop strategy including outreach opportunities)

Examples of Potential Areas of Discussion

- S** Waste Accumulation Times
Are the current regulatory requirements for accumulating wastes for both large and small quantity generators in the 90/180 day accumulation areas sufficient?
- S** Waste Generation Quantity Thresholds
Are the requirements/thresholds for determining generator status (i.e., large, small and conditionally exempt generators), and/or how hazardous waste generation is counted toward determining status appropriate?
- S** Episodic Generator Requirements
Is there a more efficient way to determine generator status during events as equipment maintenance, or manufacturing production campaigns?
- S** Waste Sampling and Testing
Are there certain conditions when it is more appropriate to use one type of sampling techniques over another (e.g., grab vs. representative, analytical vs. generator knowledge)?
- S** Waste Management Standards
Are the current waste management regulations effective in protecting the environment for large, small and conditionally exempt generators?
- S** Satellite Accumulation
Are the requirements regarding waste accumulation and moving wastes between the satellite accumulation area and consolidation area appropriate?
- S** Treatment in Containers or Tanks
Are the current regulations for treatment in tanks and containers protective? Are there additional types of treatment that are protective?
- S** RCRA Identification Numbers
In what ways can we improve the process for identifying facilities that generate a hazardous waste?
- S** Waste Minimization
Are there more efficient and effective mechanisms for generators to certify that they have a waste minimization program in place than through the use of a hazardous waste manifest, while complying with the RCRA statute?