

Newsletter

Hazardous Waste Program
Waste Management and Prevention Division
Department of Environmental Conservation

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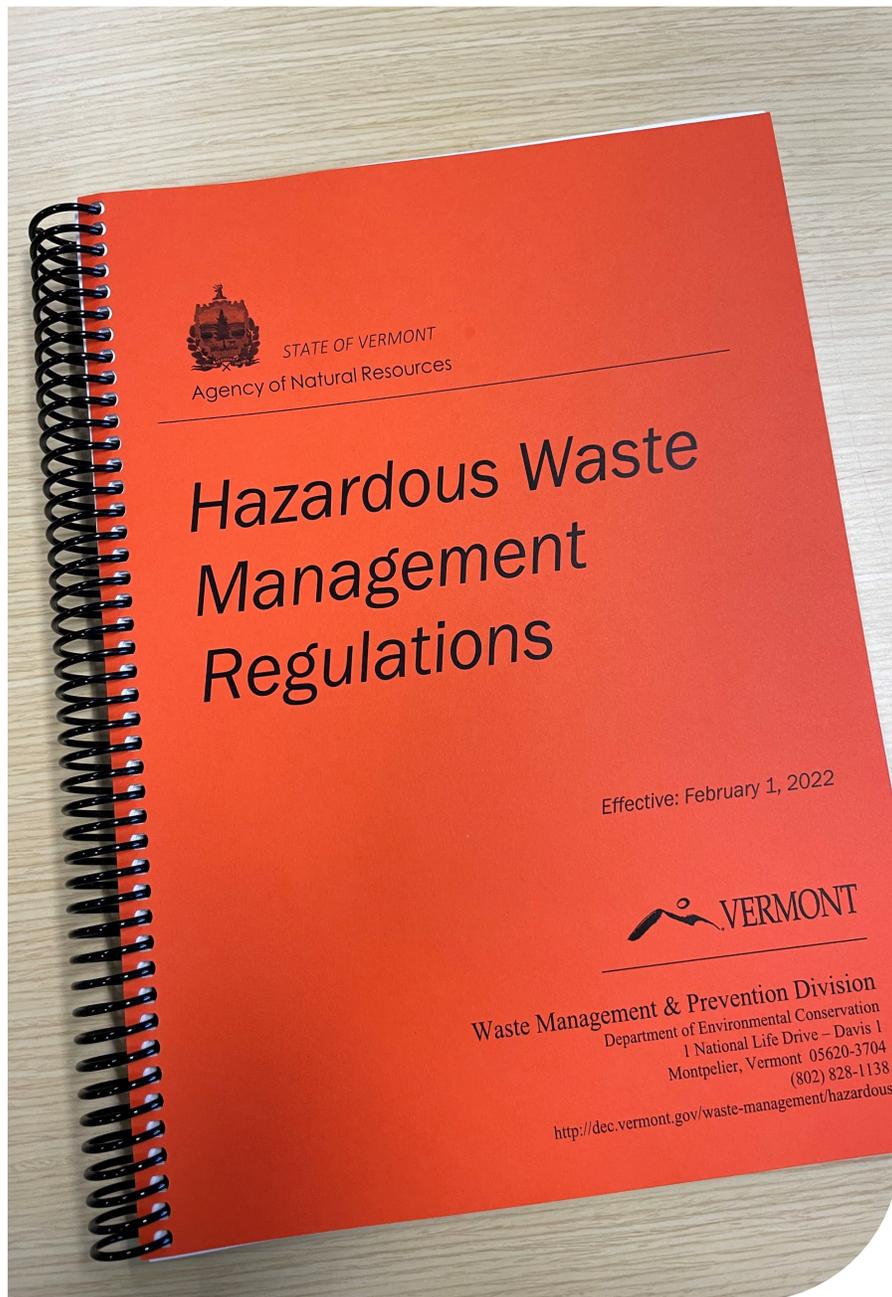
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“We anticipate distributing the newsletter on a quarterly basis throughout the year...”

Announcing Newsletter

Vermont’s Hazardous Waste Program is pleased to distribute the first issue of our newsletter. We will use this medium along with our website and other forms of communication to provide the regulated community with news, announcements, and pertinent information related to complying with the Vermont Hazardous Waste Management Regulations (VHWMR). We anticipate distributing the newsletter on a quarterly basis throughout the year, and we will refine the format, scope, and content as we determine what is most useful to the regulated community.

Revised Regulations



In case you missed it, please be aware that revisions to the VHWMR became effective on February 1st, 2022. A [Summary of Changes](#) to the regulations, the [Complete Revised Regulations](#), and additional information can all be found on the [VHWMR Webpage](#).

We are currently revising our guidance resources, such as fact sheets and guidance books, and we will be posting the revised guidance on our [Program Website](#) shortly. For now, we ask that you please make note of the following:



EPISODIC EVENTS

An episodic event is an activity (or activities) that does not normally occur during operations causing the generator to create more waste, which could cause the generator to exceed the quantity limits for its current generator category. These events can either be planned (e.g., regular maintenance, tank cleanouts, short-term projects, or removal of excess chemical inventory) or unplanned (e.g., production

“...a VSQG or SQG may maintain its existing generator category for hazardous waste generated during an episodic event, provided that the generator complies with the requirements...”

errors; product recalls; accidental spills; fires; or “acts of nature,” such as a tornado, hurricane, or flood). Standards for hazardous waste generators regarding episodic events can be found in § 7-312 of the VHWMR (see [Subchapter 3](#), beginning on page 3-39).

Per the regulations, a very small quantity generator (VSQG) or small quantity generator (SQG) may maintain its existing generator category for hazardous waste generated during an episodic event, provided that the generator complies with the requirements outlined in § 7-312. Episodic events apply to VSQGs and SQGs but do not apply to large quantity generators (LQGs). For more information, please view our [Fact Sheet on Episodic Events](#), which can be accessed via our [Environmental Fact Sheets Webpage](#).



As of June 30, 2018, all manifests must be submitted, whether paper or electronic, to the U.S. Environmental Protection Agency's e-Manifest system. This is typically done by the permitted facilities, referred to as "treatment, storage or disposal facilities" (TSDF), that receive hazardous waste from generators. The e-Manifest system enables electronic tracking of hazardous waste shipments from generators to TSDFs and serves as a national reporting hub and database for all hazardous waste manifests and shipment data.

Please be aware that a complete transition to electronic manifests will be phased in at a later date. With this in mind, we encourage all generators to [Register for a RCRAInfo Industry User Account](#), if possible. Generator proficiency with using RCRAInfo also streamlines one aspect of the hazardous waste inspections conducted by our program. Generators may show proficiency with using RCRAInfo to access

their manifest records in lieu of printing paper records for inspection. Manifest requirements applicable to generators are defined in § 7-702 of the VHWMR (See [Subchapter 7](#), beginning on page 7-2).

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UPCOMING WEBINARS



We are planning to offer a webinar or series of webinars this summer, intended to cover recent revisions to the VHWMR. The first webinar will provide an opportunity to answer your questions regarding existing regulatory requirements. We will send a separate announcement with more details once the webinar is scheduled.

New Program Position



In closing, we are pleased to “e-introduce” the incumbent of a new position within the Hazardous Waste Program. As an Environmental Analyst, Drew Youngs will be providing compliance assistance to the roughly 3,000 hazardous waste generators in the state. This will include providing information (e.g., guidance documents, fact sheets), training opportunities (e.g., webinars), compliance assistance visits, and other resources intended to assist the regulated community in achieving regulatory compliance. He will also be serving as the point of contact for [Toxic Use and Hazardous Waste Reduction](#) (also referred to as Pollution Prevention, or “P2”) planning. Please feel free to contact Drew using his information below, and he will coordinate as necessary within our Program to assist.

FOR MORE INFORMATION PLEASE CONTACT:

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