Technical Corrections/Hazardous Waste Generator Improvements/ Pharmaceuticals/Definition of Solid Waste: ASTSWMO Comments on U.S. Environmental Protection Agency Direct Final Rule



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The Hazardous Waste Subcommittee of the Association of State and Territorial Solid Waste Management Officials ("ASTSWMO") submitted October 10th comments to the United States Environmental Protection Agency on technical corrections to the following Resource Conservation and Recovery Act ("RCRA") rules:

- Hazardous Waste Generator Improvements Rule
- Hazardous Waste Pharmaceuticals Rule
- Definition of Solid Waste Rule

The technical corrections were published as a final rule in the August 9th Federal Register. See 88 Fed. Reg. 54086.

ASTSWMO describes itself as an association representing the waste management and remediation programs of the 50 states, five territories, and District of Columbia.

EPA had described the technical corrections in the direct final rule as:

. . . minor corrections that fall within the same sections of the hazardous waste regulations but are independent of these three rules.

It cited as examples of the types of corrections being made in the rule as including but not limited to:

- Correcting typographical errors
- Correcting incorrect or outdated citations
- Making minor clarifications
- Updating addresses

The Hazardous Waste Subcommittee of ASTSWMO in its October 10th comments identifies various corrections that it believes would benefit from further clarification from EPA. The comments include suggestions by state hazardous waste programs outside the membership of the Subcommittee which it did not adopt. They are forwarded for EPA's information and consideration.

In addition, while not addressed in the proposed or direct final rule, the Subcommittee received comments related to errors that an individual state believed require correction. These comments are also included.

A copy of the October comments can be found here and the Federal Register notice here.