

# Veolia North America

Regulatory Update - June 2025



## **ENVIRONMENTAL UPDATES**

- A. [EPA; SQG Re-Notification Required in 2025; Memorandum](#)
- B. [EGLE; Hazardous Waste Pharmaceuticals can no longer be managed as Universal Waste in Michigan; Guidance Document](#)
- C. [Wisconsin DNR; Addition of Aerosol Cans as Universal Waste in Wisconsin; State Regulatory Change](#)

## **TRANSPORTATION UPDATES**

*No Transportation Updates for June 2025*

## **HEALTH & SAFETY UPDATES**

*No Health & Safety Updates for June 2025*

## **MISCELLANEOUS UPDATES**

*No Miscellaneous Updates for June 2025*

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**A. SQG Re-Notification Required in 2025; Memorandum**

**Agency**

Environmental Protection Agency (EPA)

**Dates**

Re-Notification Due: 9/1/2025

**Summary**

Under the U.S. Environmental Protection Agency's (EPA's) Hazardous Waste Generator Improvements Rule, small quantity generators (SQGs) are now required to re-notify every four years.

To satisfy this requirement, SQGs need to update their Notification of RCRA Subtitle C Activities (Site Identification Form), also known as EPA Form 8700-12, or state equivalent by September 1, 2025. For more information and to see if this requirement is in effect in your state, contact your state or EPA regional office.

Additional information regarding hazardous waste generation and applicable regulations can be found at [www.epa.gov/hwgenerators](http://www.epa.gov/hwgenerators).

**Reference/Link**

The link below will allow you to view/print the Memorandum.

[https://www.epa.gov/system/files/documents/2024-11/10635\\_2025\\_tsdf\\_re-notification\\_handout\\_single\\_for\\_inhouse\\_printing\\_508.pdf](https://www.epa.gov/system/files/documents/2024-11/10635_2025_tsdf_re-notification_handout_single_for_inhouse_printing_508.pdf)

**B. Hazardous Waste Pharmaceuticals can no longer be managed as Universal Waste in Michigan; Guidance Document**

**Agency**

Michigan Department of Environment, Great Lakes, and Energy (EGLE)

**Dates**

Published Date: 06/2025

## Summary

As of May 5, 2025 Hazardous Waste Pharmaceuticals can no longer be managed as universal waste in Michigan. The Michigan Department of Environment, Great Lakes, and Energy (EGLE) adopted the remaining 40 CFR 266 Subpart P (Hazardous Waste Pharmaceuticals) provisions into Michigan's Hazardous Waste Program on April 28, 2025, this became effective on May 5, 2025. The rule changes removed pharmaceuticals as a universal waste type and replaced the management standards with equivalent or more strict provisions from Subpart P.

## Reference/Link

The link below will allow you to view/print the Guidance Document.

<https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Programs/MMD/Drug-Disposal/Handling-Unwanted-Pharmaceuticals.pdf>

### C. Addition of Aerosol Cans as Universal Waste in Wisconsin; State Regulatory Change

## Agency

Wisconsin Department of Natural Resources (Wisconsin DNR)

## Dates

Published Date: 06/2025

Effective Date: 07/01/2025

## Summary

Effective July 1, 2025 Aerosol Cans may now be managed as Universal Waste in Wisconsin. This change is expected to reduce regulatory costs for a wide variety of establishments generating and managing aerosol cans, including the retail sector, by providing a clear, protective system for handling hazardous waste aerosol cans. The Universal Waste Standards provide generators with more flexibility in managing their waste including more time to store Universal Waste on site and wastes that are managed as Universal Waste are not counted towards the Hazardous Waste Generator categories.

To view Wisconsin Universal Waste Management Standards please click the following link:

[https://docs.legis.wisconsin.gov/code/admin\\_code/nr/600/673](https://docs.legis.wisconsin.gov/code/admin_code/nr/600/673)

## Reference/Link

The link below will allow you to view/print the Webpage on the State Regulatory Change.

<https://dnr.wisconsin.gov/topic/Waste/Hazardous.html>

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Veolia Environmental Solutions and Services

# REGULATORY ALERT

## Re-Notification Requirement for Small Quantity Generators



## Re-Notification Requirement for Small Quantity Generators

**Agency:** United State Environmental Protection Agency

**Published Date:** 11/28/2016

**Effective Date:** 05/30/2017

**Renotification Due Date:** 09/01/2025

Under the U.S. EPA's Hazardous Waste Generator Improvements Rule, small quantity generators (SQGs) must re-notify every four years. To satisfy this requirement, SQGs need to update their Notification of RCRA Subtitle C Activities (Site Identification Form), also known as EPA Form 8700-12, or state equivalent by September 1, 2025.

SQGs generate more than 100 kilograms, but less than 1,000 kilograms of non-acute hazardous waste and no more than 1 kg of acute waste per month.

There are two ways that SQGs can make the Re-Notification. This is either using the Paper EPA Form 8700-12 or by submitting online.

- [The Federal Paper Form and additional details can be found by clicking this link](#)
- Many states have opted into MyRCRAID. MyRCRAID is an electronic reporting system for submitting the EPA Site ID form. SQGs in states that have adopted MyRCRAID are encouraged to submit the re-notification online. SQGs can find [more information about MyRCRAID here](#) and learn how to submit the re-notification online.

The EPA re-notification requirement is effective in authorized states that have adopted the Generator Improvements Rule, as well as non-authorized states (Iowa and Alaska), Indian Country and most U.S. Territories. [Click this link to see EPA's map of where the Generator Improvements Rule is currently in effect.](#)

Please click the following link for Outreach Materials for Treatment, Storage and Disposal Facilities (TSDFs) to distribute to SQGs:

<https://www.epa.gov/hwgenerators/small-quantity-generator-sqg-outreach-materials-treatment-storage-and-disposal>

### Link

The link below will allow you to print/view the EPA's page on the Re-Notification Requirement for Small Quantity Generators

<https://www.epa.gov/hwgenerators/re-notification-requirement-small-quantity-generators#Q3>

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