

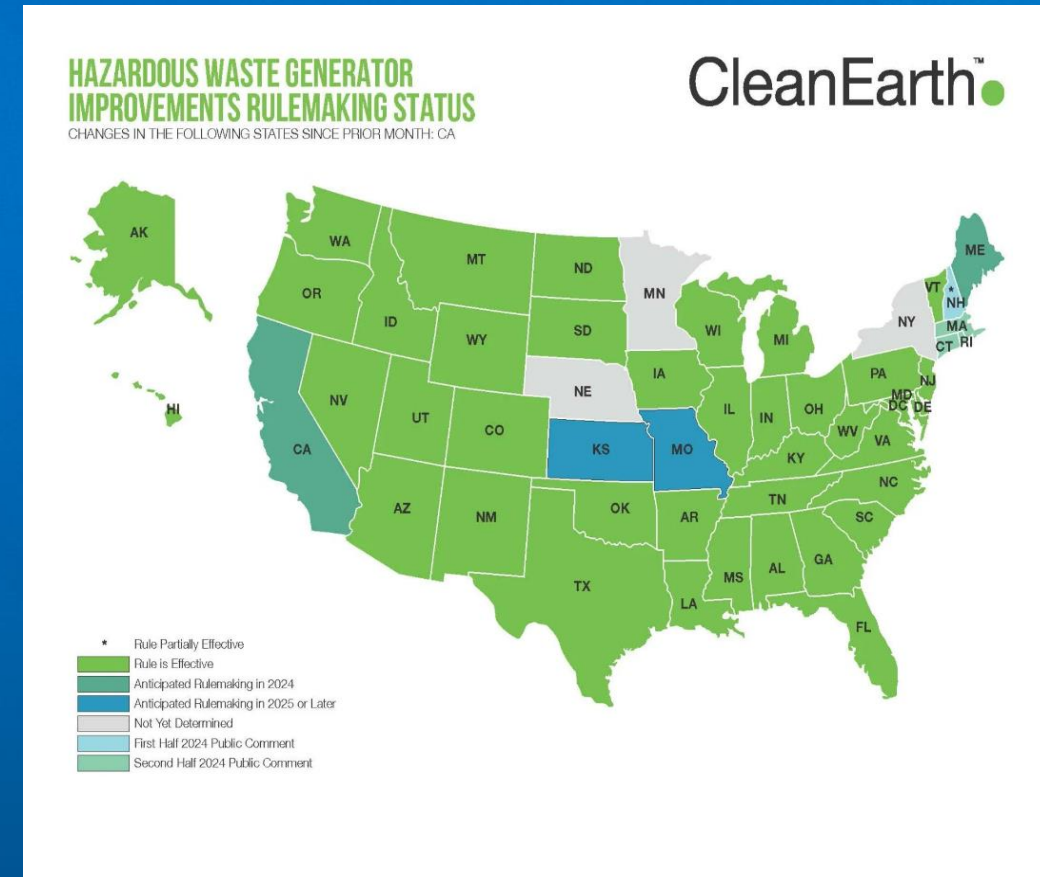
RCRA Updates



Hazardous Waste Generator Improvements Rule - State Adoption Status

41 States have either adopted or authorized the Generator Improvements Rule as of September 2024 (including Iowa).

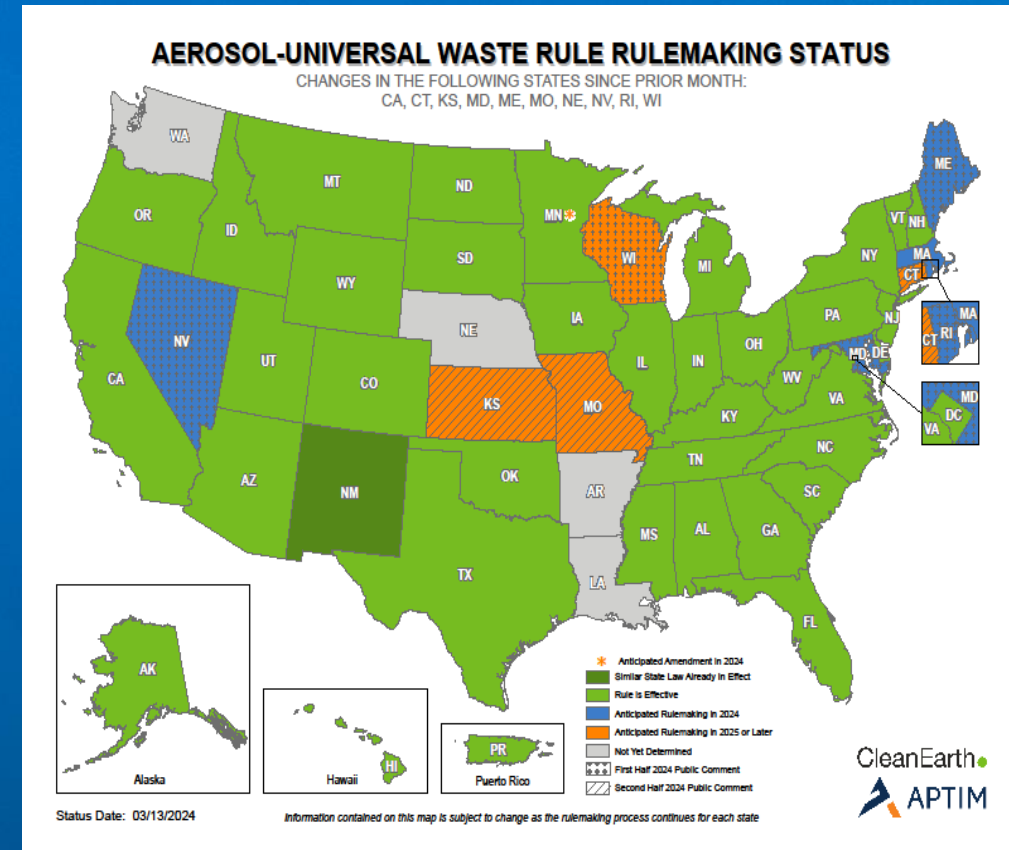
- **Kansas** – The rule is being drafted per BWM Policy 2017-P2. The proposed rule, along with hearing dates, comment periods and meeting notices, is set to be published in 2024. The final rule is expected to go into effect in 2025 or 2026.
- **Missouri** – The adopted rule has been drafted. The proposed rule was published on August 15, 2024 and is in comment period. The final rule is set to go into effect on February 18, 2025.
- **Nebraska** – No rulemaking yet in place, Will be included in the next update to Hazardous Waste Regulations. Anticipating 2025 for draft rule.



Aerosol Cans As Universal Waste - State Adoption Status

38 States have either adopted or authorized aerosol cans as Universal Waste as of September 2024 (including Iowa).

- **Kansas** – The rule is currently being drafted. The proposed rule, hearing dates, comment periods and meeting notices are expected to be published in 2024. The final rule is set to go into effect in 2025 or 2026.
- **Missouri** – The adopted has been drafted and currently in comment period. The final rule is set to go into effect on February 18, 2025.
- **Nebraska** – No rulemaking yet in place, Will be included in the next update to Hazardous Waste Regulations. Anticipating 2025 for draft rule.





Universal Waste Changes

- EPA is developing a proposed rule that would modify the existing “universal waste” requirements for lithium batteries and expand the universal waste rule to cover waste photovoltaic (PV) solar panels.
- EPA expects the proposal to be ready for publication by the summer of 2025.
- Will impose more prescriptive storage requirements for lithium batteries to reduce the potential for fires.
- Adding solar panels will help facilitate environmentally sound recycling of solar panels.



E-Manifest Final Rule

- The third and final RCRA e-Manifest Rule has been published. The Rule takes effect on January 22, 2025.
- Will require large and small quantity generators to create online accounts in the RCRAInfo Portal to access completed manifests.
- Removes the existing requirement for receiving facilities to transmit a copy of the completed manifest by mail.
- Submit exception reports through the e-Manifest system.



Matt Shanahan, CHMM

Burns & McDonnell - Environmental Compliance

mshanahan@burnsmcd.com