

Strategy for Addressing the Retail Sector under RCRA

January 22, 2016

I. Introduction

A. Objective

The objective of this document is to present the U.S. Environmental Protection Agency (EPA or Agency) strategy for addressing the retail sector under the federal Resource Conservation and Recovery Act (RCRA).

EPA recognizes that there are occasions when unused/intact consumer goods¹, including customer returns, cannot be sold by the original retailer for a variety of reasons such as mandatory or voluntary recalls, seasonal changes, overstock and expired shelf-life. EPA also recognizes that the retail sector has established a framework for managing unsalable items using the reverse distribution process, which utilizes reverse logistics centers, and relies upon arrangements with suppliers/vendors² to determine ultimate disposition.

The Agency is also taking into account retail sector practices already in place to promote sustainability by ensuring that retail items remain marketable as commodities for donation or liquidation³, thus reducing the amount of waste generated, and to encourage recycling of wastes that are generated, as opposed to being disposed as hazardous waste.⁴

With this in mind, our strategy consists of a three-pronged approach:

1. Evaluate the effectiveness of Agency policy, guidance and rulemaking, as discussed later in this document, in achieving our objective.
2. Research retail hazardous waste management practices and related issues in the area of reverse distribution, universal waste and other challenges.
3. Using the results of our research, identify and evaluate potential future approaches to address outstanding RCRA retail sector issues if needed.

B. Background

As a result of Executive Order 13563 regarding the retrospective review of regulations, which was signed by President Obama on January 11, 2011, EPA published a Notice of Data Availability (NODA) for the Retail Sector (79 FR 8926, dated February 14, 2014). The objective of the NODA was to better understand and address issues encountered by industry and regulators in terms RCRA regulations, guidance and policy.

In the NODA, EPA requested comment on a series of topics related to retail operations, waste management practices and management of materials that may become hazardous waste when discarded.⁵ The NODA comment period closed on May 30, 2014.

¹ Although the terms “goods” and “products” are used and generally described at times as “items” or “materials” in this document, use of these terms is not intended to indicate if or when such items/materials become wastes during the reverse distribution process.

² The terms “supplier” and “vendor” (latter more commonly used in the retail industry) appear more often in this document, as compared to “manufacturer,” since it is more likely the flow of goods/products occurs between retailers and suppliers/vendors (or agents thereof), although suppliers themselves may also be manufacturers or product formulators.

³ The term “liquidation” (also known as salvage) is used in this document to describe sale of products on the secondary market for use by consumers.

⁴ Routine maintenance activities and cleanup of spilled materials, as well as the occurrence of leaking/damaged products no longer considered commodities and “unknowns” (item contents cannot be identified), also result in waste generation.

⁵ The term discarded is defined at 40 CFR 261.2(a)(2).

EPA received comments from 44 stakeholders, with comments consisting of feedback from: (1) companies consisting primarily of retailers [nine commenters]; (2) industry/trade Associations [nine commenters]; (3) government and related organizations [seven commenters]; (4) recyclers [three commenters]; (5) waste management and treatment, storage and disposal facilities [three commenters]; (6) law firms [three commenters]; (7) reverse logistics provider [one commenter] and (8) anonymous [nine commenters]. The NODA and supporting documents, along with comments on the NODA, can be accessed through <http://www.epa.gov/hwgenerators/hazardous-waste-management-and-retail-sector>.

II. Identification of Retail Sector Issues

As part of developing this strategy, EPA has reviewed all NODA comments to identify stakeholder issues/concerns, including suggestions on how to better address the retail sector under RCRA, and has also taken into account information subsequently gathered from industry and regulators during outreach activities.⁶ The issues described below will be addressed as part of implementing this strategy.

- The retail sector differs from the industrial/manufacturing sector in the following key respects:
 - Large number of stores potentially generating solid and hazardous wastes
 - Numerous varieties of goods handled and potential wastes to manage
 - Unpredictable quantity of waste generation (episodic generation – planned and unplanned events)
 - Hazardous waste training at the store level difficult due to high employee turnover
 - Hazardous waste determinations difficult because products handled by retailers are often manufactured by someone else and ingredients are not always fully known.
 - Use of the reverse distribution process to manage unsalable products (including those that become hazardous waste when discarded)
- Suggestions from NODA commenters were grouped into the following major categories (approximate percentage of commenters shown)⁷:
 - Address Pharmaceuticals (42%)
 - Remove P-listing for nicotine-containing products (23%)
 - Manage as Universal Wastes (17%)
 - Endorse Reverse Distribution Retail Paradigm – encompasses point of generation and waste determination issues (40%)
 - Exclude Retail Goods Managed under Reverse Distribution Process as Solid Wastes (15%)
 - Allow Management of Aerosol Cans as Universal Waste (35%)
 - Expand Universal Waste Regulations to Other Waste Categories
 - Pesticides (19%)
 - Electronics (17%)
 - All Retail Goods⁸ (14%)
 - Provide Flexibility for Episodic Generation and Hazardous Waste Quantity Determinations (19%)
 - Exclude Retail Goods as Household Hazardous Waste/Expand “Household Hazardous Waste” Exemption (10%)
 - Revise and Update Satellite Accumulation Area Requirements (9%)

⁶ Additional information regarding EPA’s key observations and particular examples of stakeholder outreach efforts to date is provided in the Appendix to this strategy.

⁷ Universal waste percentages include instances where certain items (pharmaceuticals, aerosol cans, pesticides and electronics) were identified individually and where retail goods as a whole were mentioned.

⁸ Assumed to include, but would not necessarily be limited to, pharmaceuticals, aerosol cans, pesticides and electronics.

- Additional NODA comments not able to be grouped into major categories are below:
 - Determining the actual extent of the retail sector “universe” in terms of the numbers of retailers, types of retail items handled and amount of wastes generated, as well accurately designating generator categories (i.e., large quantity, small quantity and conditionally exempt small quantity generators).
 - Coordinating and with other federal agencies when issuing guidance/policy or developing regulations that may affect management of materials/wastes in the retail sector in order to avoid unnecessary conflicts or duplication of effort.
 - Clarifying the Agency’s position regarding whether aerosol cans are considered a reactive hazardous waste in addition to adding aerosol cans to universal waste program.
 - Conducting outreach activities such as identifying/providing opportunities for training and offering compliance assistance.
 - Supporting use of e-Manifest and other electronic means of documenting compliance with RCRA regulations.
 - Recognizing challenges associated with waste management under differing state regulations.
 - Eliminating the requirement for large quantity generators to store ignitable or reactive waste at least fifty feet from the facility’s property line.

III. Components of Strategy to Address Issues

In crafting this strategy, EPA has taken into account regulatory efforts already underway and the potential effectiveness of these efforts to address retail sector issues. A discussion of these efforts is provided below:

A. Ongoing Efforts

Management of Pharmaceuticals
<ul style="list-style-type: none"> • The proposed Pharmaceuticals Rule addresses concerns over triggering large quantity generator status and episodic generation issues (in the case of hazardous pharmaceutical waste).⁹ This rule also addresses the following: <ul style="list-style-type: none"> ✓ Explores options in the rule preamble to address concerns with designating nicotine-containing smoking cessation products (e.g., gums, lozenges and patches) and other low-concentration nicotine-containing products such as acutely hazardous (P-listed) wastes. ✓ Includes a “request for comment” section in the rule preamble to acquire new toxicity data for nicotine to support two other potential regulatory options: (1) narrow exemption of FDA-approved over-the-counter smoking cessation products (patches, gums, and lozenges) from P075 listing and (2) broader, concentration-based approach to listing nicotine (P-listing for high concentrations and U-listing for low concentrations similar to the approach taken for warfarin). ✓ Requests comment in the rule preamble on whether e-cigarettes and nicotine-containing e-liquids for e-cigarettes should be included within the scope of the definition of pharmaceutical and therefore managed as other hazardous waste pharmaceuticals. ✓ Requests comment on whether other low-concentration nicotine-containing products such as inhalers and nasal sprays should also be exempted from P-listing (P075 waste code).

⁹ Based on comments received on the proposed Pharmaceuticals Rule, which was published in the Federal Register on September 25, 2015, the Agency will determine the extent to which this rule addresses stakeholder concerns and conduct outreach as necessary. Additional information on this rule is available at <http://www.epa.gov/hwgenerators/proposed-rule-management-standards-hazardous-waste-pharmaceuticals>.

- In letters dated May 8, 2015, EPA also issued separate guidance clarifying that: (1) e-cigarettes are P075 waste due to the attached cartridges of nicotine (RCRA Online 14850) and (2) nicotine patches, gums, lozenges and e-cigarettes are not solid or hazardous waste when sent for nicotine reclamation (RCRA Online 14851).

Management of Non-Pharmaceuticals

- The final Definition of Solid Waste (DSW) Rule, published on January 13, 2015, provides a conditional exclusion for hazardous secondary materials, including aerosol cans and possibly other retail items. If these materials are managed according to specified conditions, legitimately recycled and sent to a verified recycler, they would not be regulated as hazardous waste. Additional information on this final rulemaking is available at <http://www.epa.gov/hwgenerators/final-rule-2015-definition-solid-waste-dsw>.
- EPA is coordinating with stakeholders and conducting outreach activities in order to implement and monitor effectiveness of the final DSW rule.
- EPA plans to address management of aerosol cans through issuance of separate guidance that achieves the following objectives:
 - ✓ Explains how existing federal RCRA regulations, including the final DSW rule, would apply to recycling of aerosol cans.
 - ✓ Clarifies the status of aerosol can reactivity under federal RCRA regulations.

Episodic Generation/Hazardous Waste Quantity Determinations

- The proposed Generator Improvements Rule addresses a number of issues facing the hazardous waste generator community, including the following issues relevant to the retail sector¹⁰:
 - ✓ Provides flexibility for episodic generators of hazardous waste.
 - ✓ Allows consolidation of conditionally exempt small quantity generator waste at large quantity generators.
 - ✓ Permits waiver of the 50-foot buffer requirement for ignitable/reactive wastes under certain conditions
 - ✓ Revises certain emergency preparedness and planning requirements.
 - ✓ Requires large quantity generators that accumulate in containers at central storage areas to close these units as landfills if clean closure is not achieved.
 - ✓ Requires small and large quantity generators to keep documentation when a solid waste is not determined to be a hazardous waste.

¹⁰ Based on comments received on the proposed Generator Improvements Rule, which was published in the Federal Register on September 25, 2015, the Agency will determine the extent to which this rule addresses stakeholder concerns and conduct outreach as necessary. Additional information on this rule is available at <http://www.epa.gov/hwgenerators/proposed-rule-hazardous-waste-generator-improvements>.

B. Future/Planned Efforts

EPA has also identified certain key retail sector issues that require further study in order to determine if additional actions are necessary. In particular, the Agency is obtaining relevant information that focuses on the following:

- Activities related to the reverse distribution process and the “flow”¹¹ of items among different entities, including how credit is awarded and when hazardous waste determinations are made, the roles and relationships of retailers, suppliers/vendors, reverse logistics centers and others, as well as issues encountered to date by industry and regulators in terms of complying with RCRA regulations.
- Experiences of industry and state/local regulators regarding management of certain items, such as aerosol cans and electronics, as universal wastes, including advantages/disadvantages and challenges associated with such management.

A discussion of these issues and associated planned activities is provided below:

1. Point of Generation and Waste Determination (Relating to Reverse Distribution)

A key question in determining point of generation is when a material, such as a retail item, is “discarded,” as defined in the federal RCRA regulations. Once the decision to discard is made, a material becomes a solid waste and the person making this decision is a generator of solid waste. At such point and time, the generator would be required to determine if the waste is a hazardous waste.

The decision when a material will be discarded is especially important in terms of the retail sector since the reverse distribution process is being used, with reverse logistics centers playing a key role, to determine whether products are donated, liquidated, repurposed¹², otherwise recycled or disposed as hazardous waste.

EPA also recognizes that suppliers/vendors/manufacturers provide “manufacturers’ credit” to retailers for unsalable consumer goods, which have an inherent value in that they remain potentially marketable as commodities that could be donated or liquidated. Although this may serve as incentive for proper management until such time credit is received, it does not necessarily follow that these items will, in fact, ultimately be sold or liquidated. They may become a waste, for instance, in cases where a supplier/vendor requires disposal, in which case the “return value” exists solely as an incentive for retailers to stock a particular consumer good. For this reason, the Agency is also interested in better understanding how the credit process works in practice, including the role played by reverse logistics centers, and how this affects when waste determinations are made.

With the aforementioned in mind, EPA has identified the following areas related to the reverse distribution process for continued study as part of implementing this strategy:

- Nature/extent and significance of regulatory challenges encountered when managing consumer goods in the retail sector by determining:
 - 1) scope of the retail “universe,” including the number of “small box” stores and the even “smaller box” (e.g., individually- or family-owned) stores;
 - 2) approaches for reaching out to individually- or family-owned stores;
 - 3) degree to which states (and/or local governments) more stringently manage retail stores falling under the federal conditionally exempt small quantity generator category; and
 - 4) positions of regulators such as EPA regions, states and, as necessary, local governments on the location of the point of generation.

¹¹ A diagram showing the flow of retail items and relationships among various organizations who manage consumer goods and wastes is available at <http://www.epa.gov/hwgenerators/strategy-addressing-retail-sector-under-resource-conservation-and-recovery-act>.

¹² The term “repurposed” is used in this document to describe use of a products in a manner other than originally intended.

- Established protocols or corporate directives in place that specify how retail stores, reverse logistics centers and suppliers handle excess inventory, such as expired or outdated items, seasonal items, overstock, damaged/recalled products and returned items, make hazardous waste determinations and decide the ultimate disposition of products.
- Relationships, including any written agreements or contracts, that exist among stores, manufacturers/suppliers or their agents, support organizations such as third-parties that may provide waste characterization assistance, reverse logistics centers and any other organizations involved in management of consumer goods, including items that may become hazardous waste when discarded.
- Contracts or other agreements in place between a retailer and supplier/vendor that specify how the process for returning unsalable items and awarding of credit works, as well as the extent to which particular products are required to be managed a certain way, such as prohibiting donation or liquidation and requiring disposal as hazardous waste due to “branding issues” or other concerns.
- Extent to which information on the chemical content of manufactures’ products is developed and shared with retail stores or others in order to inform appropriate end-of-life management.
- Retail products known through experience to either be candidates for use/reuse, such as being donated or liquidated in the vast majority of instances, versus likely disposed as hazardous waste, regardless of whether credit is received.
- Percentage of products originating from retail stores, including products sent to the manufacturer/supplier or their agent, ultimately donated, liquidated, repurposed or otherwise recycled versus being disposed as hazardous waste.

2. Role of Universal Waste Regulations

EPA is exploring the potential for adding certain retail items, such as aerosol cans, pesticides, and/or electronics, to the federal universal waste regulations by conducting the following activities:

- Obtain additional information regarding state programs currently in place to manage aerosol cans (e.g., California and Colorado) and electronics (e.g., Arkansas, California, Colorado, Connecticut, Louisiana, Michigan, Nebraska and New Jersey) as universal wastes.
- Identify and consult with states that are considering including aerosol cans, electronics or other types of items as categories of universal waste.
- Determine the extent to which states regulate other retail items, including pesticides beyond those recalled, as in suspended or cancelled, under the Federal Insecticide, Fungicide, and Rodenticide Act, as universal wastes.
- Evaluate information received from states.

C. **Next Steps to Resolve Any Remaining Issues**

EPA has already initiated outreach/coordination efforts and will continue to consult with various stakeholders (industry, regulators and other federal agencies) as part of implementing this strategy. It is anticipated that this consultation process will continue to involve attending meetings and conferences, conducting site visits and participating in various work groups. See Section V. for the schedule.

IV. Issues Not Being Addressed by EPA

EPA has determined that further action is not appropriate to address suggestions made by certain NODA commenters regarding the following:

A. Household Hazardous Waste Exemption

EPA does not plan to expand the “household hazardous waste” exclusion at 40 CFR 261.4(b)(1) to include either retail goods as a whole or certain types of retail goods. This issue was addressed as part of previous rulemaking (49 FR 44978, dated November 13, 1984).

As explained in 49 FR 44978, EPA excluded household hazardous waste because the legislative history of RCRA indicated an intent to exclude such wastes and not because these wastes can never pose the risks associated with hazardous wastes. Additionally, consistent with legislative history, EPA determined that it was necessary to consider two criteria associated with this exclusion. First, the waste must be generated by individuals on the premises of a temporary or permanent residence and, second, the waste stream must be composed primarily of materials found in wastes generated by consumers in their homes. In this final action, EPA denied the petition by the American Retail Federation to exempt consumer household products from retail sources because these wastes fail to meet both criteria. EPA continues to believe that retail goods, including those that could become wastes when discarded, do not satisfy these criteria.

B. Satellite Accumulation Area Requirements

EPA does not plan to revise requirements at 40 CFR 262.34(c), such as allowing accumulation of up to 55 gallons of an individual waste stream or increasing total quantity of accumulated non-acute hazardous waste from 55 gallons to a higher amount such as 100 gallons or 220 gallons at each accumulation area. This issue was addressed as part of previous rulemaking (49 FR 49568, dated December 20, 1984).

The original intent of creating satellite accumulation areas was to recognize that, within industrial/manufacturing settings, there is a practical distinction between these areas and central accumulation areas. Within an industrial complex, there may be several places where hazardous wastes are initially generated and collected during daily operations prior to consolidation at a central accumulation area for on-site management or transportation off-site. EPA believes that this situation is not particularly well suited to the retail sector given the numerous types of goods handled and potential wastes managed at stores and because the initial accumulation of hazardous wastes at or near points of generation, as contemplated by creation of satellite accumulation areas, does not appear to be an integral part of waste management operations at stores.

V. Retail Strategy Schedule (subject to revision)

Milestone Description	Date
Propose Pharmaceuticals Rule for Public Comment	September 2015
Propose Generator Improvement Rule for Public Comment	September 2015
Finalize Retail Sector Strategy	January 2016
Issue Aerosol Can Memoranda	Spring 2016
Complete Remaining Outreach Activities	Spring – Summer 2016
Develop Options to Address Outstanding Retail Sector Issues (if necessary)	Fall – Winter 2016

Contacts: Questions regarding this strategy should be directed to Drew Lausch at lausch.robert@epa.gov or 703-603-0721 or Jim O’Leary at oleary.jim@epa.gov or 703-308-8827.

APPENDIX

Key Observations to Date

As part of developing this strategy, the Agency has been conducting outreach efforts (meetings, conferences, site visits, etc.) with key stakeholders and, based on these efforts, the following is noted in no particular order of importance:

- When and where hazardous waste determinations are made (i.e., at the store versus at a reverse logistics center) varies from retailer to retailer and from product to product – and may also vary with time.
- Certain big box retailers are using safety data sheet-based scanning systems keyed to universal product codes (UPCs) or stock keeping units (SKUs) to assist in making waste determinations at the store; however, small box stores and the even smaller (e.g., individually- or family-owned) stores may lack this capability and/or may not be fully aware of RCRA obligations.
- Retailers are using third parties to ensure proper management of products determined to be hazardous waste at store locations, although the extent to which this occurs across the retail sector is uncertain.
- Reverse logistics centers also use an SDS-based UPC/SKU scanning system, although the extent to which reverse logistics centers as a whole are taking this approach is uncertain.
- Waste determinations typically occur at the reverse logistics centers for some retail goods when it's clear that these items have a high possibility of being donated, liquidated or otherwise recycled.
- Certain non-prescription drugs (e.g., hand sanitizers, cold medicines, throat sprays) and supplements such as vitamins are sent to reverse logistics centers where they are disposed as hazardous waste if, for example, the expiration date has passed.
- Given past experiences or other information, such as agreements between suppliers/vendors and retailers, retailers may know beforehand that certain consumer goods will ultimately be disposed as hazardous waste, including products that are returned to ensure receipt of manufacturer/supplier credit.
- Retailers may also be assuming increased responsibility for management and ultimate disposition of unsalable retail items as part of the “Adjustable Rate Policy” process (supplier/vendor or agent not involved).¹³
- Reverse logistics centers play a key role in the management of consumer goods. Important functions involve: (1) data collection; (2) financial reconciliation such as credit verification; (3) recall management; (4) material tracking and (5) material disposition (i.e., reuse, recycling or disposal). Reverse logistics centers may offer benefits such as increasing the likelihood that consumer goods may be donated or liquidated, due to economies of scale, and ensuring that hazardous waste determinations are properly performed.
- The role played by suppliers/vendors in management of retail products under RCRA, including providing credit to retailers, making waste determinations and influencing ultimate disposition, is critical and represents an area requiring further study by EPA.
- Besides serving as links in the supply chain between manufacturers and retail stores, suppliers/vendors may also make/formulate products, although the extent to which this occurs is unknown.

¹³ Additional information on the Adjustable Rate Policy and other reimbursement policies for unsalable items can be found in the publication entitled, 2008 Joint Industry Unsaleables Management Study: The Real Causes and Actionable Solutions. This publication is available at <http://www.gmaonline.org/downloads/research-and-reports/UnsaleablesFINAL091108.pdf>.

- Retail items may be repaired/refurbished for ultimate use by consumers but how often and by whom is uncertain.

Stakeholder Outreach Efforts

Since the close of the NODA comment period, EPA has been reaching out to various stakeholders and engaging in discussions in order to learn more about challenges associated with RCRA and the retail sector. Some examples include:

- EPA participated in the Retail Industry Leaders Association (RILA) conference during September 29-October 2, 2014 in Minneapolis, MN, which accorded an opportunity to network with various industry representatives regarding the Retail NODA and the Agency's retail initiative.
- EPA provided an update regarding the Retail NODA at the annual meeting of the Association of State and Territorial Solid Waste Management Officials on October 30, 2014 in Reston, VA.
- On November 20, 2014, EPA met with the World Floor Covering Association (WFCA) to learn more about WFCA's industry/membership and discuss the Retail NODA and better understand the relevance of Agency's retail initiative and retail strategy development on products manufactured by WFCA members.
- On January 7, 2015, EPA provided regulatory updates to regions and states including a discussion regarding the status of the Pharmaceuticals Rule, Generator Improvement Rule and Definition of Solid Waste Rule, as well as efforts associated with the retail initiative and retail strategy development.
- On January 14, 2015, EPA participated in a regulatory roundtable as part of the Council on Safe Transportation of Hazardous Articles Quarterly Membership meeting in Arlington, VA. Discussions involved Retail NODA comments and development of a strategy to address retailer concerns.
- EPA gave a presentation on the Retail NODA and development of a retail strategy as part of the RILA conference on February 10th in Atlanta, GA and Pesticide Stewardship Alliance conference on February 11th in Savannah, GA.
- During February 23-26, 2015, the Agency participated in a series of meetings and visits involving EPA Region 9, various levels of government in the State of California (Attorney General's Office, Cal EPA, local District Attorney Offices and counties), and industry representatives. This included tours of an electronics waste facility, retail stores (CVS, COSTCO and Lowes) and a reverse logistics center (Inmar Incorporated).
- During March 16-19, 2015, in support of implementing the EPA's Retail Sector Strategy, the Agency attended the Store Planning, Equipment, Construction and Facilities Services 2015 Annual Conference in Las Vegas, NV – where the Agency gave a presentation on RCRA and the retail strategy and sustainability management – toured a Walmart store and return center, and met with the State of Nevada's Division of Environmental Protection.
- On April 13, 2015, EPA participated in a Retail Waste Workgroup meeting sponsored by the California Department of Toxic Substances Control. This meeting included regulators at federal, state and local levels of government in California, as well as representatives from industry such as retailers and suppliers. EPA gave a presentation on efforts to date to address RCRA and the retail sector.
- On June 9, 2015, EPA provided an overview of the Pharmaceuticals Rule and Generator Improvement Rule, as well as the planned Retail Sector Strategy, at a Northeast Waste Management Officials Association training workshop in Sturbridge, MA.

- During July 7-9, 2015, the Agency participated in a series of meetings and visits involving EPA Region 4, the Alabama Department of Environmental Management and the Georgia Department of Environmental Resource's Environmental Protection Division. This included a meeting with Giant Cement Holding Incorporated representatives and tour of Giant Resource Recovery's aerosol processing/recycling facility.
- EPA participated in the RILA conference during September 14-17, 2015 in Austin, TX, during which time the Agency gave presentations on the proposed Hazardous Waste Pharmaceutical and Hazardous Waste Generator Improvements rules as well as provided an update on the Agency's Retail Strategy. EPA also met with representatives from the Texas Commission on Environmental Quality.
- EPA participated in the Consumer Products Regulatory Compliance Workshop co-sponsored by the Personal Care Products Council and Consumer Specialty Products Association in Sacramento, CA during September 29-30, 2015. EPA gave a presentation on the Agency's Retail Strategy and an overview of federal RCRA regulations as they pertain to the retail sector, including the proposed Hazardous Waste Pharmaceutical and Hazardous Waste Generator Improvements rules.
- On November 30, 2015 and December 1, 2015, the Agency participated in facility visits involving the Pennsylvania Department of Environmental Protection and New Jersey Department of Environmental Protection. This included tours of a manufacturer's distribution center (S.C. Johnson), a reverse logistics center (DRS Product Returns) and a pharmaceutical wholesaler (Cardinal Health).