

**Regulatory Updates**  
**Compiled for the Pine Chemicals Association**  
**September 2, 2025**

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UPCOMING CONFERENCES

-National Safety Council Safety Congress and Expo, Denver CO, September 12-18, 2025

**-PCA International Conference, San Diego CA, September 21-23, 2025**

## SAFETY

**[Webinar] Protect Your Interest: Workplace Crisis Management** - This topic could also be related to an environmental incident as well. Details on the type of credit hours are noted below. “On Wednesday, September 10, 2025, at 1 p.m.ET [join representatives from Conn Maciel Carey] for a webinar titled [Protect Your Interest: Workplace Crisis Management](#). Whether it’s a prolonged labor strike, a publicized workplace fatality, or a sudden violent attack against your employees or customers, your organization would benefit from a legal, strategic, and practical approach to identifying, preparing for, and responding to significant workplace events with widespread negative implications. This webinar will explore what businesses can do to prevent and minimize operational, fiscal, reputational, and legal harm, and ensure business continuity, by implementing strategies to proactively identify and mitigate risks as well as appropriately respond to and manage a crisis to protect their business and brand. . . This program is valid for 1 PDC for the SHRM-CPSM or SHRM-SCPSM and 1 HR (General) recertification credit hours through HRCI®.” [Click here to register](#) for the September 10th Webinar. (OSHA Defense Report, Conn Maciel Carey, 8/28/2025.)

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## ENVIRONMENT

**Small Quantity Generators Must Re-Notify EPA by September 1** - “September 1, 2025, is the second deadline for small quantity generators (SQGs) of hazardous wastes to re-notify EPA (or their state environmental agency) of their activities. EPA’s 2016 RCRA Generator Improvements Rule added a provision to the hazardous waste regulations to require re-notification from SQGs once every four years on September 1 (40 CFR 262.18(d)(1)). Small quantity generators must re-notify EPA using [Form 8700-12](#), also called a Site ID Form (or the state equivalent). Electronic reporting via the MyRCRAID system is an option in some states. By requiring re-notification from small quantity generators every four years, EPA can ‘maintain more accurate data into the future for outreach, compliance assistance, and oversight activities.’” Read the full article [here](#). (Lion Technology, Inc., 7/30/2025.)

**First-Ever Accidental Release Rule Settlement Reached with Pacific Gas & Electric** - Perhaps a topic for a future meeting, remember that certain chemical releases must be reported to the Chemical Safety Board (CSB). Reports to the National Response Center are not considered CBB notification.

“U.S. Environmental Protection Agency (EPA) and the U.S. Chemical Safety and Hazard Investigation Board announced a settlement with Pacific Gas and Electric Company (PG&E) resolving a violation of the Clean Air Act (CAA) and the 2020 Accidental Release Reporting rule. This is the first time EPA has taken an enforcement action and reached a settlement with a company for violations of the 2020 rule.

On June 8, 2023, an accidental release of natural gas from a PG&E pipeline in San Jose, California, caused a serious injury to a PG&E employee. PG&E failed to report the incident to the CSB. Under the settlement, PG&E will pay a civil penalty of \$45,273 for failing to report that incident. PG&E has submitted a report to the CSB containing the required information about the incident. . . The Accidental Release Reporting rule is part of the chemical accident prevention requirements under section 112(r) of the CAA. The rule requires owners and operators of stationary sources to report accidental releases of regulated or other extremely hazardous substances that result in a fatality, serious injury, or substantial property damage to the CSB. The CAA authorizes EPA to enforce the failure to report an accidental release to the CSB. Failure to report incidents such as these hinder the CSB’s ability to investigate accidental releases, determine probable causes of those releases, and recommend measures to prevent future occurrences. This settlement further reinforces the partnership between the CSB and EPA in promoting chemical safety and preventing accidental releases.

Read the [EAB's order to PG&E \(pdf\)](#) , and the [February 21, 2020 Chemical Accident Reporting final rule \(pdf\)](#) (85 Fed. Reg. 10074) for more information. Additional information on the CSB’s Accidental Release Reporting rule is available in the [CSB’s 2022 Reporting of Accidental Releases \(pdf\)](#).” (epa.gov, 7/28/2025.)

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**EPA Relaunches Comprehensive Guidance Document Website** - “On August 13, 2025, the U.S. Environmental Protection Agency (EPA) [announced](#) the relaunch of [EPA’s Guidance Portal](#), ‘a streamlined website for accessing important guidance documents related to air quality, water protection, hazardous waste management, and more.’ According to EPA, the website serves as a resource for all guidance documents managed across EPA’s headquarters environmental programs. EPA designed the website to be a ‘one-stop shop to help users and small businesses easily and quickly locate and follow EPA’s active guidance documents on topics of interest.’ EPA notes that guidance documents are ‘agency statements of general applicability, intended to have future effects on the behavior of regulated parties, that set forth a policy on a statutory, regulatory, or technical issue, or an interpretation of a statute or regulation, with some exceptions.’ According to EPA, the portal does not contain documents excluded from this definition, ‘such as internal guidance directed to EPA or other federal agencies that is not intended to have future effect on the behavior of regulated parties, rules of agency organization, procedure, or practice, and internal executive branch legal advice or legal opinions addressed to executive branch officials, among others.’ EPA’s guidance documents generally lack the force and effect of law.” (Lexology, Bergeson & Campbell PC - Lynn L. Bergeson and Carla N. Hutton, 8/19/2025.)

**Do I Need DOT Hazmat Training to Sign the Hazardous Waste Manifest?** - Please audit your hazardous waste manifests, with a special emphasis on parts washer chemicals.

“Is DOT hazmat training required to sign the hazardous waste manifest? Yes! To understand why, it helps to know the terminology first. The DOT regulates the safe transportation of hazardous *materials*. Included within the definition of hazardous *materials* are hazardous *wastes*. The DOT defines a hazardous *waste* as ‘any material that is subject to the Hazardous Waste Manifest Requirements of the US Environmental Protection Agency specified in 40 CFR part 262.’ Therefore, a RCRA hazardous waste requiring the use of a manifest is regulated as a DOT hazardous material. . . What does a signature on a manifest mean? It’s much more than handing over custody to the driver. In addition to certifying the generator is meeting the applicable conditions found at 40 CFR 262.27 (e.g., they have a waste minimization plan in place and have chosen the best TSDF), the DOT part of the statement is as follows:

*‘I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations...’*

In order to certify this is true, **the signer must be fully trained in DOT hazmat regulations.** US DOT requires hazmat employees – anyone whose actions can directly affect transportation safety – to be trained. The elements of training include general awareness, function-specific and security awareness training. (Some hazmat employees also need safety training and cargo security plan training).” Read the full article [here](#). (Lion Technology, Inc., Roseanne Bottone, 8/19/2025, reposted from 11/12/2019.)

**Help Sheet for Hazardous Waste Training** - For your reference, see the attached [help sheet](#) from Lion Technology, Inc. related to training requirements for “hazardous waste personnel.”

## **TRANSPORTATION**

**Video: Hazmat Packing Groups Explained** - Some hazardous materials are more hazardous than others. Most of the nine hazard classes and divisions use Packing Groups (PG) to distinguish severity of hazard. This [video](#) addresses the classes and divisions that use PG ‘groupings’ - PG I, PG II, and PG III - to identify levels of danger within the same class or division. (Lion Technology, Inc., 8/11/2025.)

*Send your suggestions and comments to [ehs@pinechemicals.org](mailto:ehs@pinechemicals.org)*

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