

KDWM



Kentucky Division  
Of  
Waste Management  
Hazardous Waste Branch

Subpart P Fact Sheet

### Changes to 40 CFR 266 Subpart P

- VSQGs operating under the optional provision of 40 CFR 266.504 **do not** have to register or obtain an EPA ID number
- Nicotine replacement therapy products delisted from P075 in 40 CFR 261
- Part 266.505 prohibits the pouring of pharmaceuticals **into sewers**
- Part 266.507 pertains to the management of residues in containers (**no more triple rinse**)
- Parts 266.505 & 507 are **obligatory** to all facilities
- Facilities operating under Subpart P do not have to count hazardous waste pharmaceuticals towards **generator status**
- Must be sent back through **reverse distribution** to be credited
- The waste amount generated **will not** be added to the facility total for the reporting month or year
- **Will not** change generator status
- **No modifications** necessary for unregistered waste stream codes

You can also email [brandon.may@ky.gov](mailto:brandon.may@ky.gov) for more information/assistance.