



Temporary Units Compendium

Supporting Memos, Regulations, and Policies

October 2024
EPA 530-F-24-017

Temporary Units (Title 40 of the Code of Federal Regulations Section 264.553): For temporary tanks and container storage areas used to treat or store hazardous remediation wastes during remedial activities required under 40 CFR Section 264.101 or Resource Conservation and Recovery Act Section 3008(h), or at a permitted facility that is not subject to 40 CFR Section 264.101, the Regional Administrator may designate a unit at the facility, as a temporary unit. A temporary unit must be located within the contiguous property under the control of the owner/operator where the wastes to be managed in the temporary unit originated. For temporary units, the Regional Administrator may replace the design, operating, or closure standard applicable to these units with alternative requirements with protect human health and the environment.

Document Category	RCRA Online/Resource	Resource Title	Document Date	Notes
Memo	RO 13214	OECM Comments on Corrective Action Rule	August 23, 1988	Summarizes agreement between Sylvia Lowrance (Director, Office of Solid Waste) and Edward Reich (Deputy Associate Enforcement Counsel) concerning Temporary Unit preamble language. “We will also develop additional preamble language explaining the legal rationale behind temporary units...” States that TUs will be limited to managing wastes that originate within the facility boundary.
Memo	RO 13461	Use of Proposed Subpart S Corrective Action Rule as Guidance Pending Promulgation of the Final Rule	March 27, 1991	Memo from Lisa Friedman (Associate General Counsel, Solid Waste and Emergency Response Division) to Regional Counsel RCRA Branch Chiefs concerning which portions of the proposed Subpart S rule could be implemented immediately on a case-by-case basis without further rulemaking.

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				<p>“Several of the proposed regulations governing the management of wastes generated during a corrective action require changes in the existing regulations and thus may not legally be used as guidance until those changes have been made final and effective. Such proposed changes include the provisions allowing for waiver of applicable closure requirements, reduced requirements for ‘temporary units’, and any use of the CAMU concept other than to allow designation of an area of broad contamination as a single unit for purposes of determining what RCRA management standards apply.”</p>
Memo	RO 11665	Environmental Growth Initiative	February 10, 1992	<p>Memo from Don Clay (Assistant Administrator) to William Reilly (Administrator) concerning Clay’s proposal to restructure and streamline OSWER’s regulatory programs.</p> <p>RCRA Reform initiative and Temporary Units: “We will finalized [sic] a proposal to allow temporary storage and treatment at cleanup sites to be exempted from more stringent LDR treatment standards that were designed with permanent disposal in mind. Imposition of LDR treatment standards on temporary units has</p>

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				discouraged voluntary cleanups and added significant extra costs to mandatory cleanups.”
Federal Register	58 FR 8683	Corrective Action Management Units and Temporary Units; Corrective Action Provisions; Final Rule	February 16, 1993	This rule “finalizes provisions for corrective action management units (CAMUs) and temporary units under subpart S of 40 CFR part 264. Both of these units function solely to manage wastes that are generated at a RCRA facility for the purpose of implementing remedial actions required at the facility (i.e., remediation wastes, as defined in this rule.”
Letter	RO 11746	Response from Sylvia Lowrance (Director, Office of Solid Waste) to Doug MacMillan (Institute of Chemical Waste Management) regarding the impact of CAMU regs on management of “as-generated” hazardous wastes.	May 4, 1993	“As I understand from your letter, and from subsequent discussions with my staff, your primary concern is that as-generated containerized hazardous wastes being stored at a facility could be considered remediation wastes, and therefore could be managed at an area or a facility that has been designated as a CAMU, with the effect that those wastes would no longer be subject to the RCRA land disposal requirements, or to minimum technology requirements... We are willing to consider adding a clarification to the regulation that would specifically exclude management of as-generated wastes in CAMUs, as well as in temporary units. I would welcome further discussions with you and your organization on this matter.”

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Memo	RO 14291	Management of Remediation Waste Under RCRA	October 14, 1998	Consolidation of existing guidance on RCRA regulations and policies that most often affect remediation waste management, including Temporary Units.
Memo	EC-G-2002-097	Summary Chart of October 14, 1998 Memorandum, "Management of Remediation Waste Under RCRA."	October 15, 1998	"Corrective Action Temporary Units are a type of RCRA unit specifically for [remediation waste]. TUs may meet modified design, operating and closure standards instead of the RCRA standards that usually apply to tanks and containers. Prior state or EPA approval and specification of unit standards required. Operation limited to one year with opportunity for one one-year extension."
Federal Register Notice	63 FR 65939	Hazardous Remediation Waste Management Requirements (HWIR-media)	November 30, 1998	"In today's final rule, the Agency has revised the definition of CAMU, as well as the CAMU and temporary unit regulations themselves. This revision clarifies the Agency's interpretation of these provisions and accommodates EPA's new interpretation, promulgated today, that remediation-only facilities are not subject to the facility-wide corrective action requirement under RCRA section 3004(u)."
Memo	https://www.epa.gov/sites/default/files/2016-04/documents/02camutu.pdf	Corrective Action Management Units (CAMUs) and Corrective Action Temporary Units (TUs) – 40 page compendium of memos/FR notices	N/A	Compilation of various guidance documents / memos / Federal Register notices pertaining to Temporary Units (some are specific to CAMUs and are labeled as such in the documents)