Short Term Generators (One-Time Generator)

As of October 1, 2019, "Provisional ID Numbers" (starting with the prefix "NCP") will no longer be issued by the North Carolina Hazardous Waste Section.

EPA Identification (ID) Numbers will now be issued for sites operating as "short term generators."

What is a short term generator?

A "short term" generator is any site generating hazardous waste only as the result of a one-time, non-recurring, temporary event that is not related to normal production processes. The site is normally not a generator of hazardous waste. In other words, short term generators produce hazardous waste from a particular activity for a limited time and then cease conducting that activity. The short term generator notification is used:

- Typically, for sites that do not already have an EPA ID number assigned
- For one-time generation of hazardous waste
- This can be used for emergencies (e.g., unknown drums on property that does not already have an EPA ID number)
- This is not used for sites that normally generate hazardous waste (even very small amounts)
- This type of generator is considered a "short term generator"

Short term generators are not considered episodic generators because episodic generators (i.e., very small quantity generators (VSQG) and small quantity generators (SQG)) regularly generate hazardous waste as part of their operations but elevate to a higher generator category as a result of a planned or unplanned event (see Episodic Generation Guidance).

Examples of short term generators that also meet the above criteria include (but are not limited to):

- One-time highway bridge maintenance waste generation,
- Underground storage tank removals,
- Generation of off-specification or out-of-date chemicals at a site that normally does not generate hazardous waste,
- Remediation or spill clean-up at sites with no previous RCRA EPA Identification Number; and
- Site or production process decommissions.

Is there a fee associated with operating as a short term generator?

The same fees (N.C.G.S. 130A-294.1) apply to short term generators that apply to permanent generators of hazardous waste. The fees are based on the amount of hazardous waste generated.

- 220 lbs. up to 2,200 lbs.: $317
- 2,200 lbs. or more: $1,660

The short term generator number will not be issued (or updated, if already issued) until the fee has been paid.

What is short term ID number used for and how long is the short term ID number effective?

The EPA ID number that is issued to short term generators is used to track the hazardous wastes activity and hazardous waste generated at the site. The short term ID number is meant for one-time use and is good for 90 days for a large quantity generator (LQG) or 180 days for a small quantity generator (SQG).

Upon completion of the short term event or at 90 days (for a LQG)/180 days (for a SQG) (whichever comes first), the EPA ID number will be automatically deactivated by the Hazardous Waste Section RCRAInfo Administrator.

If a short term generator needs more than 90 days (for LQGs) or 180 days (for SQGs) to complete this one time disposal project or if the site will generate hazardous waste on a regular basis, the site must submit a notification (electronically using myRCRAid) unmarking the short term generator portion of the notification (Item 10.A.2).

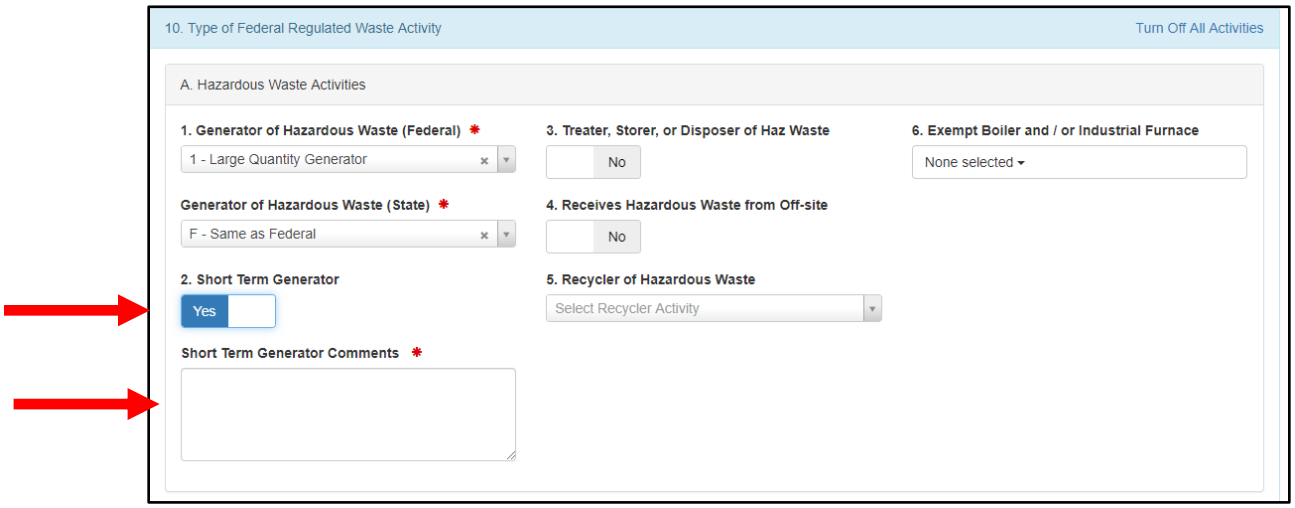
How do I apply for a short term generator ID Number?

To notify as a short term generator, a site contact must first register on EPA's RCRAInfo database at this link: https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login

A Guide to Registering in RCRAInfo can be found at this link: www.deq.nc.gov/waste-management/dwm/hw/8700-guidelines/guide-rcrainfo-registration-and-notification/download?attachment

A more comprehensive tutorial for registering and requesting and EPA ID number in RCRAInfo can be found at this link: https://www.deq.nc.gov/waste-management/dwm/hw/hw-guidelines/rcrainfo-registration-and-electronic-notification-tutorial/download?attachment

The site will complete an electronic Site Identification form (an electronic version of the EPA 8700-12 form) in the RCRAInfo myRCRAid module. When notifying as a short term generator, for Item 10.A.1, the appropriate generator category (either LQG or SQG) will be selected for the short term event. Then mark "Y" for "Short Term Generator" (on Item 10.A.2 of the electronic Site Identification form). When "Y" is marked for Item 10.A.2, you must provide an explanation of your short term generation event in the Comments Section (and may include additional information in Item 18 - Comments).



What requirements are applicable to short term generators?

Short term generators are subject to the same regulations as permanent hazardous waste generators. The requirements for hazardous waste generators can be found in North Carolina's Hazardous Waste Management Rules (15A NCAC 13A). Failure to comply with these regulations may result in enforcement actions. The following Hazardous Waste Section website provides links to state hazardous waste rules and law: https://deq.nc.gov/about/divisions/waste-management/hw/rules

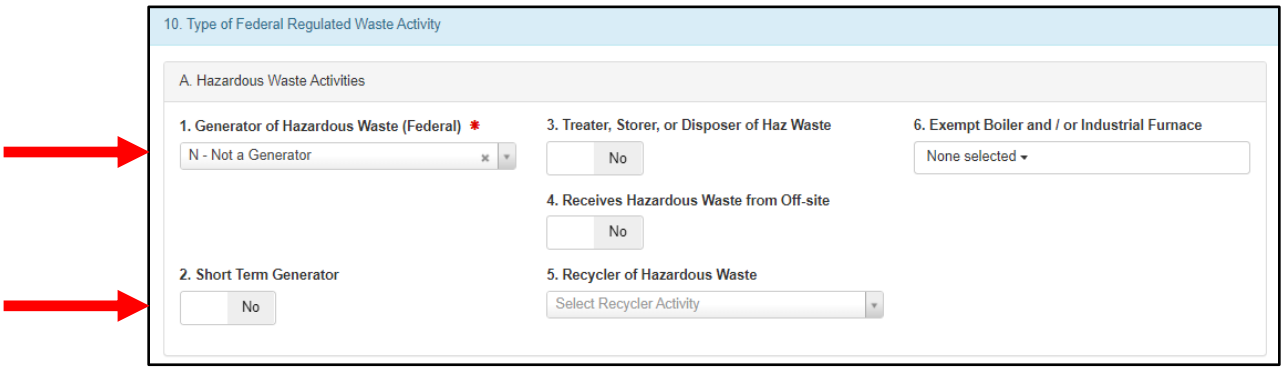
A short term generator must determine the site's hazardous waste category and comply with the applicable requirements for the hazardous waste generator category at which they operate (even if for a short period of time) [40 CFR 262.13, adopted by reference at 15A NCAC 13A .0107(a)].

Hazardous waste generator guidance for the different categories (including compliance guidance documents for small and large quantity generators) can be found on the Hazardous Waste Section webpage at this link: https://deq.nc.gov/about/divisions/waste-management/hw/technical-assistance-education-guidance/documents Then scroll down and click on the "Hazardous Waste Generator" section of the webpage.

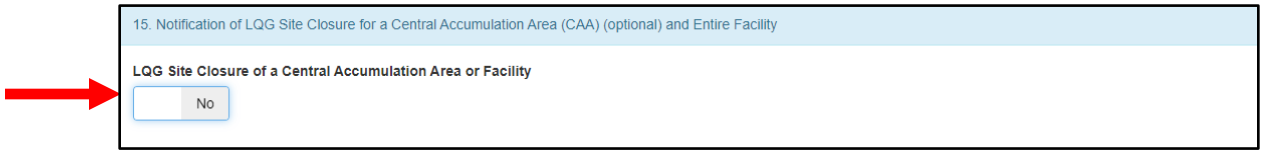
How do I close out a short term generator EPA ID Number?

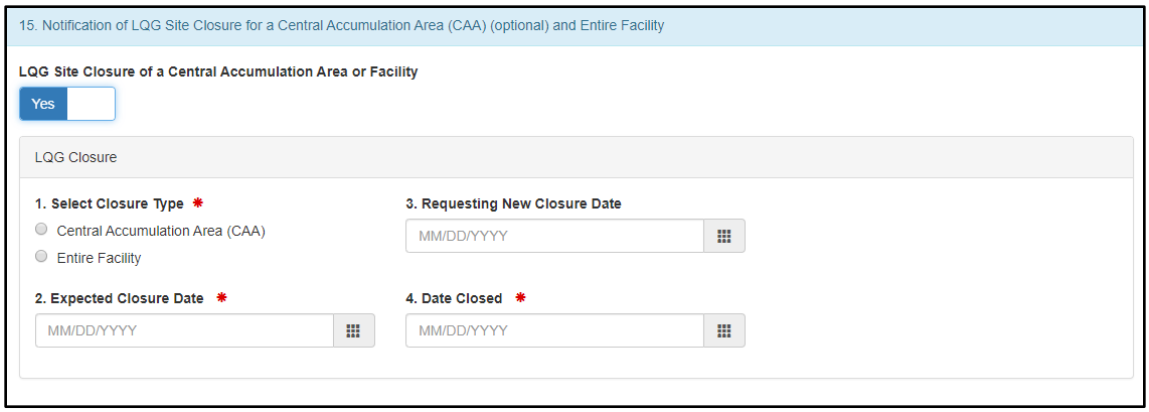
Upon completion of the short term event or at 90 days (for a LQG)/180 days (for a SQG) (whichever comes first), the EPA ID number will be automatically deactivated by the Hazardous Waste Section RCRAInfo Administrator.

When a site notifies as a short term large quantity generator of hazardous waste, that site is subject to all large quantity generator requirements (even for the short period of time). This includes, but is not limited to, the large quantity generator closure requirements described at 40 CFR 262.17(a)(8). A notification(s) will need to be submitted by the site to provide Notification of LQG Site Closure for a Central Accumulation Area (CAA) and/or Entire Facility (Item 15 of the electronic notification) or, alternatively, can be completed to document closure of the central accumulation area or the facility (see top of page 4). If the site submits a notification after the EPA ID number has been deactivated, the site must remember to mark Item 1 (Reason for Submittal) as "Notifying that regulated activity is no longer occurring at this Site," Item 10.A.1 as "N – Not a Generator," ensure that the toggle button for Item 10.A.2 for Short Term Generator is switched to "No," and make any other necessary updates to the notification form and ensure comments about updates are made in Item 18 – Comments.



Once the Item 15 Yes/No button is switched to "Yes," an addendum opens allowing input of information on the closure of the central accumulation area or the entire facility (see screen shot on page 4). Any additional information can be entered in Item 18 – Comments.





Alternatively, information on central accumulation area closure including but not limited to a copy of the manifest indicating all short term hazardous waste was properly disposed of and photographs showing there were no spills of the short term hazardous waste while managed at the site along with a statement certifying the accumulation area was closed and there were no releases of hazardous waste may be emailed to your local Hazardous Waste Section Inspector. This information will be placed in the publicly accessible "Laserfiche" database for Division of Waste Management files as a record of the central accumulation closure.

Who do I contact if I have questions about short term generator notification?

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Other questions?

If you have **site specific questions**, please contact your local Hazardous Waste Section Inspector. Contact information and Inspector regions are on this map at this link:
https://www.deq.nc.gov/compliance-map-inspector/download?attachment?attachment