



## Differences between Episodic Generator and Notifying at a Higher Hazardous Waste (HW) Generation Category (Including Short Term Generator)

| Type of Notification      | Episodic Generator Notification   | Notifying at a Higher Generation Category (Including Short Term Generator)  |
|---------------------------|---|---|
| When should this be used? | <ul style="list-style-type: none"> <li>For VSQGs and SQGs that episodically generate (either planned or unplanned) larger volumes of hazardous waste (HW).               <ul style="list-style-type: none"> <li>Planned episodic event means an episodic event that the generator planned and prepared for, including regular maintenance, tank cleanouts, short-term projects, and removal of excess chemical inventory</li> <li>Unplanned episodic event means an episodic event that the generator did not plan or reasonably did not expect to occur, including production process upsets, product recalls, accidental spills, or "acts of nature," such as tornado, hurricane, or flood.</li> </ul> </li> <li>Specific Conditions of 40 CFR 262 Subpart L apply (including time frames, paperwork and container management) – see <a href="#">Episodic Generation Guidance</a></li> <li>When conditions are all met, the site can remain at original (VSQG or SQG) generation category even when episodic hazardous waste is generated.</li> <li>Must have an existing EPA ID number or must obtain an EPA ID number when notifying of the episodic event.               <ul style="list-style-type: none"> <li>If operating as a VSQG (with no EPA ID number), must obtain the EPA ID number when notifying of the episodic event.</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>For sites that have an existing EPA ID number but cannot or do not meet the conditions for Episodic Generator Notification requirements.</li> <li>Can also be used for a site that does not yet have an EPA ID number assigned to the property. The EPA ID number can be obtained during the notification to a higher generator category.</li> <li>Can be used for a short term generator (see below for more information).</li> </ul> <p>This section provides more information about Short Term Generators (which is one option when notifying at a higher generation category):<br/>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. This is used:</p> <ul style="list-style-type: none"> <li>Typically for sites that do not already have an EPA ID number assigned</li> <li>For one-time generation of hazardous waste</li> <li>This can be used for emergencies (e.g., unknown drums on property that does not already have an EPA ID number)</li> <li>This is not used for sites that normally generate HW (even very small amounts)</li> <li>See <a href="#">Short Term Generator Guidance</a> for more information.</li> </ul> <p>Short-term generators are <u>not</u> considered episodic generators because episodic generators (i.e., VSQGs and SQGs) 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 <a href="#">Episodic Generator Guidance</a>).</p> <p>Examples of short-term generators include that also meet the above criteria include (but are not limited to):</p> <ul style="list-style-type: none"> <li>One-time highway bridge waste generation;</li> <li>Underground storage tank removals;</li> <li>Generation of off-specification or out-of-date chemicals at a site that normally does not generate hazardous waste;</li> <li>Remediation or spill clean-up at sites with no previous RCRA EPA Identification Number; and</li> <li>Site or production process decommissions</li> </ul> |

## Differences between Episodic Generator and Notifying at a Higher Generation Category (Including Short Term Generator)(continued)

| Type of Notification   | Episodic Generator Notification  | Notifying at a Higher Generation Category (Including Short Term Generator)   |
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| Applicable Rules   | <p>For VSQGs: 40 CFR 262.14(c) ref. 40 CFR 262 Subpart L<br/>For SQGs: 40 CFR 262.16(f) ref. 40 CFR 262 Subpart L</p> <p>Must meet applicable conditions of 40 CFR 262 Subpart L</p>   | <ul style="list-style-type: none"> <li>- This is only a general overview and not an exhaustive list of requirements.</li> <li>- Technically, must make waste determination (40 CFR 262.11), determine HW category (40 CFR 262.13), and comply with requirements for the HW generation category at which they operate (SQG: 40 CFR 262.16; LQG: 40 CFR 262.17) based on the amount of hazardous waste generated in a calendar month and/or the amount accumulated on site at any time.</li> <li>- Short term generators must also meet all applicable HW requirements, even if only for a short period of time.</li> </ul>  |
| <p>How is this tracked?</p> <p><i>See "How is this Notification Made?" for more information.</i></p> | Episodic generator has an EPA ID (or obtains one during notification) and is tracked in RCRAInfo. Facility has 60 days (from event start to finish) to dispose of episodic hazardous waste.  | Generator has (or obtains) an EPA ID number and is tracked in RCRAInfo. The facility may renotify at the lower generation category once the hazardous waste is shipped off site.   |
| Time Frame to dispose of Hazardous Waste   | 60 days  | <p>SQG: 180 days (or 270 days if TSD is &gt; 200 miles away)</p> <p>LQG: 90 days</p>   |
| Benefit(s)   | <ul style="list-style-type: none"> <li>- Generator maintains VSQG or SQG category but is subject to the episodic generation conditions of 40 CFR 262.Subpart L.</li> <li>- Not required to comply with the higher generator category (SQG/LQG) requirements they operate at for the episodic event.</li> <li>- The generator only has to submit the notification once – they do not have to submit a second notification after completion of the event or to reduce the generation category after the event.</li> <li>- Generator may withdraw from an episodic event if episodic waste turns out to not be HW or if the amount of episodic HW would not cause the site to go into a higher generator category.</li> </ul> | <ul style="list-style-type: none"> <li>- If notifying at a higher generation category, there is a time limit to ship HW off-site, but no time limit to complete a project.</li> <li>- For a site that has never had an EPA ID number assigned, the site will now have an EPA ID number, and any future HW activity updates can easily be made electronically in the RCRAInfo database myRCRAid module.</li> <li>- A site that notified initially as a short term generator will have an EPA ID number assigned to the property so if hazardous waste is generated again in the future at this site, the site may utilize the episodic generator notification (as long as the conditions and prescribed time frames can be met).</li> </ul> |
| <p>Associated Fee</p> <p>(Based on amount of HW generated N.C.G.S. 130A-294.1)</p>                   | <ul style="list-style-type: none"> <li>- 220 lbs. up to 2,200 lbs. non-acute HW; 2.2 lbs. or less of acute HW: \$300</li> <li>- 2,200 lbs. or more non-acute HW; more than 2.2 lbs. of acute HW: \$1,400</li> </ul>  | <ul style="list-style-type: none"> <li>- 220 lbs. up to 2,200 lbs. non-acute HW; 2.2 lbs. or less of acute HW: \$300</li> <li>- 2,200 lbs. or more non-acute HW; more than 2.2 lbs. of acute HW: \$1,400</li> </ul> <p>For Short Term Generator: EPA ID number will not be issued/updated until the fee has been paid.</p>   |

## Differences between Episodic Generator and Notifying at a Higher Generation Category (Including Short Term Generator)(continued)

| Type of Notification  | Episodic Generator Notification   | Notifying at a Higher Generation Category (Including Short Term Generator)  |
|---|---|---|
| How is this notification made?  | <p>For any reason: an episodic event or to notify at a higher generation category (including a short term (one time) generator), when a facility needs to request a new EPA ID number or make updates to site information for an existing EPA ID number, a person at the site must register on EPA's RCRAInfo database and make any necessary updates electronically in myRCRAid. Here is the link to RCRAInfo: <a href="https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login">https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login</a></p> <ul style="list-style-type: none"> <li>- A Quick Reference Guide to Registering in RCRAInfo can be found at this link: <a href="https://www.deq.nc.gov/waste-management/dwm/hw/8700-guidelines/quick-reference-guide-rcrainfo-registration-and-notification/download?attachment">https://www.deq.nc.gov/waste-management/dwm/hw/8700-guidelines/quick-reference-guide-rcrainfo-registration-and-notification/download?attachment</a></li> <li>- A tutorial for registering for RCRAInfo can be found at this link: <a href="https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/8700-guidelines/Electronic-Filing-of-EPA-Notifications.pdf">https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/8700-guidelines/Electronic-Filing-of-EPA-Notifications.pdf</a></li> </ul> |   |
|   | <p>Site updates facility information electronically in RCRAInfo, myRCRAid module. Item 10.A.1 (Generator Category) remains at VSQG or SQG. Item 13 is marked "Yes" for "Episodic Generator". Once Item 13 is marked yes, an addendum for Episodic Generation will open in a separate RCRAInfo window and must be completed. Additional comments should be entered in Item 18 – "Comments" explaining why notification is submitted and what Items on the notification have changed since the last submission.</p>   | <p>Site updates facility information electronically in RCRAInfo, myRCRAid module. Item 10.A.1 (Generator Category) is upgraded to the facility's new generator category. Additional comments should be entered in Item 18 – "Comments" explaining why notification is submitted and what Items on the notification have changed since the last submission.</p> <p>Additionally, for Short Term Generators: Mark "Y" for "Short Term Generator" (on Item 10.A.2 of the Site Identification form). If you mark "Y" for Item 10.A.2, you must provide an explanation of your short-term generation event in space provided under Item 10.A.2 (after toggling Yes/No switch to "Yes").</p>  |
| Do I need to renotify to update my generation category after the event? | <p>No, you do not need to submit a second notification after the episodic event is completed. Since the initial notification did not change the generator category in Item 10.A.1. and the episodic event dates were specified in Item 13, a second notification ending the episodic event is not necessary.</p>  | <p>Yes, once HW is shipped off site, the facility must renotify (electronically using myRCRAid) when downgrading the Generator Category information in Item 10.A.1. Comments should be entered in Item 18 – "Comments" to explain why the notification was submitted. However, a facility may opt to remain at the higher category and not submit a second notification.</p> <p>For a Short Term Generator:</p> <p>When the short term event is complete (90 days for a LQG, 180 days for SQG), the Hazardous Waste Section RCRAInfo Administrator changes the generator category to "Not a Generator"(Item 10.A.1) and "N" for Item 10.A.2 and the site EPA ID number is deactivated after short term hazardous waste activity has stopped. Facilities that had notified as a short term large quantity generation will need to submit an electronic notification to show compliance with the LQG closure requirements for a central accumulation area or facility closure (Item 15).</p> <p>If a short term generator needs more than 90 days (for a LQG) or 180 days (for a SQG) 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).</p> |
| Who do I contact with questions?  | <ul style="list-style-type: none"> <li>- For questions about RCRAInfo, updating site information/requesting an EPA ID Number: Laura Alexander 919-707-8214 <a href="mailto:Laura.Alexander@deq.nc.gov">Laura.Alexander@deq.nc.gov</a></li> <li>- For questions about billing please contact Alby Alexander: 919-707-8286 <a href="mailto:Alby.Alexander@deq.nc.gov">Alby.Alexander@deq.nc.gov</a></li> <li>- For site specific questions, contact your local Hazardous Waste Section Inspector (contact information and region provided on the map at this link): <a href="https://www.deq.nc.gov/compliance-map-inspector/download?attachment?attachment">https://www.deq.nc.gov/compliance-map-inspector/download?attachment?attachment</a></li> </ul>  |   |