

Alternative Standards for Episodic Generation

What is an Episodic Event? (R315-262-231)

It is an unusual event that causes you to generate more hazardous waste than the monthly limit for your generator category (see Table 1). One episodic event may be allowed in a calendar year. It can be:

- Planned
- Unplanned

Who can apply?

- Small quantity generators (SQGs)
- Very small quantity generators (VSQGs)

Why would a generator want to apply?

- Eliminates having to move into a higher generator class (Table 1).
- Prevents increased regulatory and reporting requirements for short term events.

What is the process for episodic events in Utah?

- 1. Generators must apply 30 days prior to a planned event or within 72 hours after an unplanned event by completing EPA Form 8700-12 and emailing it to Kaci McNeill at kmcneill1@utah.gov.
 - The form serves as notification to the Director.
 - The form requests an EPA ID Number if the site does not already have one.
 - The form must include required information specified in R315-262-232 and Table 2.
- 2. If the Director gives approval for the episodic event, manage your waste in accordance with R315-262-232.
- 3. Notify the Division when the episodic waste has been shipped off-site by emailing Kaci McNeill at kmcneill1@utah.gov.
- 4. Keep your records of the episodic event for 3 years.

What if I am not approved to manage waste in an episodic event, or what if I can't ship the waste within 60 days?

You must manage your waste according to the regulations for the higher category of generation.

What if I have 2 events in a calendar year?

Petition the Director in writing in accordance with R315-262-233.

Table 1. Generator Categories - Small and Very Small Quantity					
Quantity of Acute Hazard- ous Waste	Quantity of Non-Acute Hazard- ous Waste	Quantity of Residues from a Cleanup of Acute Hazardous Waste	Generator Category		
< 1kg (2.2 lbs)	> 100 kg (220 lbs) and < 1,000kg (2,200 lbs)	< 100 kg (220 lbs)	Small Quantity Generator		
< 1kg (2.2 lbs)	< 100 kg (220 lbs)	< 100 kg (220 lbs)	Very Small Quantity Generator		

Table 2. Conditions for a Generator Managing Hazardous Waste from an Episodic Event	SQGs	VSQGs		
1. The generator must notify the Director at least 30 calendar days prior to initiating a planned event using <u>EPA Form 8700-12.</u>		✓		
2. The generator must notify the Director within 72 hours of an unplanned event via phone, email, or fax and subsequently submit EPA Form 8700-12.				
3. Notifications must include:				
A. The start and end dates of the event.	✓	\checkmark		
B. The reasons for the event.		\checkmark		
C. The types and estimated quantities of waste.	✓	\checkmark		
D. The facility contact and an emergency coordinator with 24-hour phone access.	✓	\checkmark		
4. Accumulation of episodic hazardous waste is prohibited on drip pads and in containment buildings.	✓	\checkmark		
5. Waste in Containers and Tanks must be labeled with:				
A. The words "Episodic Hazardous Waste."	✓	\checkmark		
B. An indication of the hazard, such as ignitable, corrosive, reactive, or toxic and/or hazard communication consistent with DOT requirements, the OSHA Hazard Communication Standard, or a chemical hazard label consistent with the National Fire Protection Association code.		✓		
C. The date the episodic event began.		✓		
6. Containers and tanks must be in good condition and compatible with the waste they contain.		✓		
7. Containers must be kept closed except to add or remove waste.		\checkmark		
8. Containers must be inspected at least weekly.		✓		
9. Tanks must have procedures in place to prevent overflow.		✓		
10. Tanks must be inspected at least once per day.		✓		
11. Tanks must be managed with inventory logs, monitoring equipment, or other records to identify the date upon which each episodic event began. Logs must be kept for 3 years and be available for inspection.		✓		
12. The generator must comply with hazardous waste manifest provisions (R315-262-20 through 27) when shipping waste off-site to a designated facility (as defined in R315-260-10).		\checkmark		
13. VSQGs have up to 60 calendar days to manifest and send episodic hazardous waste to a designated facility.		\checkmark		
14. SQGs must treat episodic hazardous waste or manifest and ship such hazardous waste to a designated facility within 60 calendar days from the start of the episodic event.				
15. Records of the episodic event must be maintained for 3 years from the end date of the event and must include:				
A. The beginning and end dates of the event.	✓	\checkmark		
B. A description of the types and quantities of the hazardous waste generated.	✓	\checkmark		
C. A description of how the waste was managed and the name of the facility that received the waste.		√		
D. The name(s) of hazardous waste transporters.		✓		
E. An approval letter from the Director if the generator petitioned to conduct one additional episodic event in the calendar year.	✓	✓		