



Differences between Short Term Generator, Episodic Generator and Notifying at a Higher Hazardous Waste Generation Category

Type of Notification	Short Term Generator Notification (One-Time Generator)	Episodic Generator Notification	Notifying at a Higher Generation Category
<p>When should this be used?</p>	<p>As of October 1, 2019, "Provisional ID Numbers" (starting with the prefix "NCP") will no longer be issued.</p> <p>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"> - For sites that <u>do not already have an EPA ID number assigned</u> and - For one-time generation of hazardous waste - This can be used for emergencies (e.g. unknown drums on property that does already not have an EPA ID number) - This is not used for sites that normally generate HW (even very small amounts) - This type of generator is considered a "Short Term Generator" - See Short Term Generator Guidance for more information. <p>Short-term generators are not 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 Episodic Generator Guidance).</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"> - One-time highway bridge waste generation; - Underground storage tank removals; - Generation of off-specification or out-of-date chemicals at a site that normally does not generate hazardous waste; - Remediation or spill clean-up at sites with no previous RCRA EPA Identification Number;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. 	<ul style="list-style-type: none"> - For VSQGs and SQGs that episodically generate (either planned or unplanned) larger volumes of hazardous waste (HW). <ul style="list-style-type: none"> - 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 - 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. - Specific Conditions of 40 CFR 262 Subpart L apply (including time frames, paperwork and container management) – see Episodic Generation Guidance - When conditions are all met, the site can remain at original (VSQG or SQG) generation category even when episodic hazardous waste is generated. - Must have an existing EPA ID number or if operating as a VSQG (with no EPA ID number), must obtain an EPA ID number when notifying of the episodic event. 	<ul style="list-style-type: none"> - For sites that have existing EPA ID numbers but cannot or do not meet the conditions for Episodic Generator Notification requirements or are a short term generator that needs more than 90 days to complete a one-time project. - This 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.

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<p>Applicable Rules</p> <p><i>(General Overview only for Short Term and Notifying at a Higher Category – not an exhaustive list of requirements.)</i></p>	<p>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 the site operates (SQG: 40 CFR 262.16; LQG: 40 CFR 262.17) based on the amount of hazardous waste generated in the calendar month(s) of the short term event and/or on site at any time.</p>	<p>For VSQGs: 40 CFR 262.14(c) ref. 40 CFR 262 Subpart L</p> <p>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>	<p>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.</p>
<p>How is this used?</p>	<p>An EPA ID number is assigned to the site, but it is only good for 90 days and is meant for sites that do not ordinarily generate hazardous waste. The EPA ID number is assigned for one-time disposal and after 90 days, the site must renotify of the hazardous waste activity (typically "Not a Generator" and the site is deactivated). If more than 90 days is needed to complete this one time disposal project, the site must notify as a hazardous waste generator and cannot use the short term generator notification.</p>	<p>Episodic generator has an EPA ID and is tracked in RCRAInfo. Facility has 60 days (from event start to finish) to dispose of episodic waste.</p>	<p>Generator has an EPA ID number and is tracked in RCRAInfo. The facility must renotify at the lower generation category once the hazardous waste is shipped off site.</p>
<p>Time Frame to dispose of Hazardous Waste</p>	<p style="text-align: center;">90 days</p>	<p style="text-align: center;">60 days</p>	<p>SQGs: 180 days (or 270 days if TSD is > 200 miles away) LQG: 90 days</p>
<p>Benefit(s)</p>	<ul style="list-style-type: none"> - This EPA ID number is good for 90 days. - An EPA ID is assigned to the site. If the site has a second event where hazardous waste is generated, the site just needs to reactivate the EPA ID number for the site, update the site information (if necessary) and select the HW generator category in Section 10.A of the electronic notification (on RCRAInfo) associated with the site. - The second notification that is submitted to notify the facility is no longer a generator (and deactivate the site EPA ID number) may be used to comply with the LQG closure notification requirements of 40 CFR 262.17(a)(8) for closure of central accumulation area or facility. 	<ul style="list-style-type: none"> - Generator maintains VSQG or SQG category but is subject to the episodic generation conditions of 40 CFR 262.Subpart L. - Not required to comply with the higher generator category (SQG/LQG) requirements they operate at for the episodic event. - 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 	<p>A SQG has 180 days to ship waste. A LQG has 90 days.</p>

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Associated Fee (Based on amount of HW generated N.C.G.S. 130A-294.1)	220 lbs. up to 2,200 lbs.: \$175 2,200 lbs. or more: \$1,400 The short term ID number will not be issued until the fee has been paid.	220 lbs. up to 2,200 lbs.: \$175 2,200 lbs. or more: \$1,400	220 lbs. up to 2,200 lbs.: \$175 2,200 lbs. or more: \$1,400
How is this notification processed?	<p>For any reason: a short term (one time) generation, an episodic event, or to notify at a higher generation category when a facility needs to request a new EPA ID number or make updates to site information for an existing EPA ID number, the site must register on EPA's RCRAInfo database and make any necessary updates electronically in RCRAInfo. Here is the link to RCRAInfo: https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login</p> <p>A tutorial for registering for RCRAInfo can be found at this link: https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/8700-guidelines/Electronic-Filing-of-EPA-Notifications.pdf</p> <p>When notifying, electronically in RCRAInfo, myRCRAid module, site should mark "Y" for "Short Term Generator" (on Section 10.A.2 of the Site Identification form). If you mark "Y" for Section 10.A.2, you must provide an explanation of your short-term generation event in space provided under 10.A.2 (after toggling Yes/No switch to "Yes"). Additional comments may be entered in Section 18 –Comments.</p>	<p>Site updates facility information electronically in RCRAInfo, myRCRAid module. Section 10.A.1 (Generator Category) remains at VSQG or SQG. Section 13 is marked "Yes" for "Episodic Generator". Once Section 13 is marked yes, an addendum for Episodic Generation will open in a separate RCRAInfo window and must be completed. Additional comments about episodic event may be entered in Section 18 -Comments.</p>	<p>Site updates facility information electronically in RCRAInfo, myRCRAid module. Section 10.A.1 (Generator Category) is upgraded to the facility's new generator category.</p>
Do I need to renotify to update my generation category after the event?	<p>Yes, When the short term event is complete (90 days), the facility must submit a second electronic notification by RCRAInfo, myRCRAid module, indicating the facility is "Not a Generator". At this time, the facility may use the electronic notification to show compliance with the LQG closure requirements for a central accumulation area or facility closure (Section 15). On rare occasions, the EPA ID number may need to remain active at a specified generator category instead of notifying as "not a generator" and deactivating the EPA ID number associated with the site. If this is the case, include additional explanation in Section 18 - Comments.</p>	<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 Section 10.A.1. and the episodic event dates were specified in Section 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) downgrading the Generator Category information in Section 10. Comments should be entered in Section 18 – Comments to explain why the notification was submitted.</p>
Who do I contact with questions?	<ul style="list-style-type: none"> - For questions about updating site information/requesting an EPA ID Number in RCRAInfo: Andrew Minter 919-707-8265 Andrew.Minter@ncdenr.gov - For questions about RCRAInfo or billing please contact Christine Twining: 919-707-8214 Christine.Twining@ncdenr.gov - For assistance with the RCRAInfo Registration Process or Updating RCRAInfo Permissions: Melodi Deaver 919-707-8204 Melodi.Deaver@ncdenr.gov - For site specific question, contact your local Hazardous Waste Section Inspector (contact information and region provided on the map at this link): https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/Compliance/Compliance_Map_by_Inspector.pdf 		