

# Small Quantity Generator (SQG) Re-Notification Frequently Asked Questions

## When must a SQG re-notify?

A SQG is required to re-notify every four years starting in 2021. The initial round of SQG re-notifications was due September 1, 2021. The SQG re-notification must be submitted by September 1<sup>st</sup> of each year the re-notification is required.

# SQGs must re-notify by September 1, 2025.

## How does a SQG re-notify?

A North Carolina SQG will re-notify electronically using the EPA's RCRAInfo database myRCRAid module.

- Link to the RCRAInfo database: <u>https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login</u>
- Anyone using RCRAInfo must first register and create an account in RCRAInfo prior to submitting the notification. If you are already registered, just sign into RCRAInfo. If you are not already registered in RCRAInfo, here is a link to a Quick Reference Guide for RCRAInfo Registration and Notification Submittal: <u>https://www.deq.nc.gov/waste-management/dwm/hw/8700-guidelines/guide-rcrainfo-registration-andnotification/download?attachment</u>
- Even though the notification is submitted electronically in EPA's database, the North Carolina Hazardous Waste Section reviews and accepts the RCRAInfo submittals and registration requests.
- For questions about creating and submitting a notification in RCRAInfo contact: Andrew Minter by phone: 919-707-8265 or by email: <u>Andrew.Minter@deq.nc.gov</u>

# How early can I submit a notification in RCRAInfo and have it count towards the re-notification requirement?

If a SQG has submitted a notification in RCRAInfo anytime within the four years before the deadline to meet this requirement, then the re-notification requirement has been fulfilled. For example, if the SQG submitted a notification in RCRAInfo in November 2023, this meets the re-notification requirement.

Even if the SQG has submitted a RCRAInfo notification in the past four years prior to September 1, 2025, it is highly recommended that the SQG review the site information for accuracy and make any necessary updates to site information whenever it changes.

### What is a SQG of hazardous waste?

A site that generates greater than 100 kg (220 pounds) but less than 1,000 kg (2,200 pounds) of non-acute hazardous waste; and less than or equal to 1 kg (2.2 pounds) of acute hazardous waste, and less than or equal to 100 kg (220 pounds) of residues from a cleanup of acute hazardous waste must notify and operate as a small quantity generator of hazardous waste. Additionally, as a SQG, the quantity of hazardous waste accumulated on-site must never exceed 6,000 kg (13,200 pounds). Link to a Hazardous Waste Section guidance document showing the generator category thresholds: <u>Hazardous Waste Generator Category Thresholds</u>

#### What regulation requires a SQG to re-notify?

40 CFR 262.18(d)(1), adopted by reference at 15A NCAC 13A .0107(a).

#### Where can I get more information about the federal SQG re-notification requirement?

Further information on the SQG re-notification requirements can be found at the following EPA webpage: <u>https://www.epa.gov/hwgenerators/re-notification-requirement-small-quantity-generators</u> (Please remember that in North Carolina the re-notification is submitted electronically via RCRAInfo and <u>not</u> via the paper EPA 8700-12 form).

#### Where can I find more information about the other hazardous waste requirements for SQGs?

- A guidance document summarizing the requirements for SQGs in North Carolina can be found at this link: <u>https://www.deq.nc.gov/small-quantity-generator-checklist/download?attachment</u>
- North Carolina hazardous waste guidance documents can be found at this link: <u>https://deq.nc.gov/about/divisions/waste-management/hw/technical-assistance-education-guidance/documents</u>
- Link to North Carolina hazardous waste laws and rules: <u>https://deq.nc.gov/about/divisions/waste-management/hw/rules</u>

#### Who can I contact if I have site specific hazardous waste questions?

For site specific question, 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>