SUBPART L
ALTERNATIVE STANDARDS FOR EPISODIC GENERATION
40 CFR 262.230 & 40 CFR 262.232(a) & (b)

PRESENTED BY:

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AN ACTIVITY OR ACTIVITIES, EITHER PLANNED OR UNPLANNED, THAT DOES NOT NORMALLY OCCUR DURING GENERATOR OPERATIONS, RESULTING IN AN INCREASE IN THE GENERATION OF HW THAT EXCEEDS THE CALENDAR MONTH QUANTITY LIMITS FOR THE GENERATOR’S USUAL CATEGORY
TEMPORARILY EXCEEDS EXISTING GENERATOR CATEGORIES FOR VSQG & SQG

• **PLANNED:** SHORT-TERM CONSTRUCTION PROJECTS, SITE REMEDIATION, EQUIPMENT MAINTENANCE, EXCESSIVE CHEMICAL INDUSTRIES, AND SITE PRODUCTION PROCESS DECOMMISSIONS

• **UNPLANNED:** PROCESS UPSETS, PRODUCT RECALLS, ACCIDENTAL SPILLS, ACTS OF NATURE (FLOODS, TORNADOS, HURRICANES)
WHO IS ELIGIBLE TO BE AN EPISODIC GENERATOR (EG)

Very Small Quantity Generators (VSQG) < 220 lbs.

Small Quantity Generators (SQG) < 2,200 lbs.
LQQG NOT ELIGIBLE
EXAMPLE:  

MARIO’S AUTO BODY SHOP  

GENERATES 1 55-GALLON DRUM OF LACQUER/6 MONTHS  

• CURRENT CATEGORY: VSQG  
  NO EPA ID NUMBER  
  MANIFEST ONLY  

• SCENIARO: Mario Sr. is selling the business to Mario Jr.  
  The out-of-date SOLVENT-BASED PAINT IN THE FLAMMABLE  
  STORAGE ROOM are being replaced with NEW WATER- 
  BASED PAINT SYSTEM.
CAN MARIO’S AUTO BODY APPLY FOR EPISODIC GENERATION?

• HOW MUCH WASTE WILL BE GENERATED?

• FLAMMABLE STORAGE AREA CONTAINS:

50 55-GALLON DRUMS (400 LBS/DRUM) = 20,000 LBS. OF SOLVENT-BASED PAINTS AND ACETONE/LACQUERS

• CAN MARIO SR. BECOME AN EPISODIC GENERATOR?
EPISODIC EVENT – PLANNED OR UNPLANNED?  
YES

• **PLANNED EVENT:** MARIO SR. HAS A PLANNED EVENT THAT WILL CREATE A HAZARDOUS WASTE QUANTITY THAT EXCEEDS 220 POUNDS IN ONE CALENDAR MONTH.
VSQ GENERATOR PLANNED EVENT

MARIO’S AUTO BODY PLANNED AND PREPARED FOR:

✓ SHORT-TERM PROJECT
✓ REMOVAL OF EXCESS CHEMICAL INVENTORY
✓ CLEANOUT OF STORAGE ROOM CHEMICALS, GARAGE & TOOL SHED CLEANOUT, BASEMENTS, AND OTHER AREAS AT FACILITY CONTAINING SOLVENT-BASED PAINTS & OTHER HAZARDOUS WASTES, INCLUDING FLAMMABLES, SOLVENTS.
✓ MARIO SENIOR ESTIMATES THE START AND END DATE WILL BE COMPLETED WITH 60 DAYS FROM THE INITIAL DAY OF THE EVENT.
**PLANNED EPISODIC – VSQG TO SQG**

- FILE A 8700 FORM -12
- REQUEST AN USEPA ID NUMBER FOR HAZARDOUS WASTE ACTIVITY
- FILL OUT ADDENDUM TO THE SITE IDENTIFICATION FORM: EPISODIC GENERATOR #13
- EXPLAIN THE REASON FOR THE EVENT. PLANNED – SALE OF BUSINESS, EXCESS CHEMICAL INVENTORY REMOVAL. CLEANUP
- DESCRIBE THE WASTE(S) GENERATED – WASTE PAINTS & THINNERS: WASTE CODES (D001) CHARACTERISTIC FLAMMABLES & (F003)/(F005) LISTED SOLVENTS
- 60 DAYS TO REMOVE THE WASTE PAINT FROM THE TIME YOU START THE EVENT
- USE HW MANIFEST W/ EPA ID NUMBER & TSD – SIGN & CERTIFY FORM
EPISODIC GENERATOR’S INFORMATION

• EMERGENCY CONTACT INFO – MARIO ANDRETTI SR. 555-555-CARS
• BEGINNING AND END DATES OF THE “EVENT” (NO GREATER THAN 60 CALENDAR DAYS TOTAL)
• APPLY OR POSSESS A USEPA ID NUMBER – e.g. NJR123456789
• WASTE STREAM DESCRIPTION & CODES - e.g. WASTE FLAMMABLE LIQUID, D001 F003 F005
• ESTIMATED QUANTITIES IN POUNDS = <220 POUNDS
USEPA 8700-12 FORM


RCRA Subtitle C Reporting
Instructions and Forms
EPA Forms 8700-12, 8700-13 A/B, 8700-23
ITEM 13

- EPISODIC GENERATION
- YES OR NO
- ARE YOU AN SQG OR VSQG GENERATING HW FROM A PLANNED OR UNPLANNED EG EVENT, LASTING NO MORE THAN 60 DAYS, THAT MOVES YOU TO A HIGHER GENERATOR CATEGORY. IF YES, GO TO ADDENDUM
<table>
<thead>
<tr>
<th>Episodic Event</th>
<th>Waste 1</th>
<th>Waste 2</th>
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</thead>
<tbody>
<tr>
<td>1. Planned</td>
<td>7. Waste Description</td>
<td>7. Waste Description</td>
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<tr>
<td>Excess chemical inventory removal</td>
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<tr>
<td>Tank cleanouts</td>
<td>8. Estimated Quantity (in pounds)</td>
<td>8. Estimated Quantity (in pounds)</td>
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<td>Short-term construction or demolition</td>
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<td>Equipment maintenance during plant shutdowns</td>
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<td>Other</td>
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<tr>
<td>Accidental spills</td>
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<td>Production process upsets</td>
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<tr>
<td>Product recalls</td>
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<tr>
<td>&quot;Acts of nature&quot; (Tornado, hurricane, flood, etc.)</td>
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</tbody>
</table>

3. Emergency Contact Phone
4. Emergency Contact Name
5. Beginning Date
6. End Date
7. Waste Description
8. Estimated Quantity (LBS.)
9. Fed & State Waste Codes

- Fill out 1 thru 9
  1. Planned
  2. Unplanned
  3. Emergency Contact Phone
  4. Emergency Contact Name
  5. Beginning Date
  6. End Date
  7. Waste Description
  8. Estimated Quantity (LBS.)
  9. Fed & State Waste Codes
UNPLANNED EPISODIC EVENT

AN EPISODIC EVENT THAT THE GENERATOR DID NOT PLAN OR REASONABLY DID NOT EXPECT TO OCCUR, INCLUDING:

• PRODUCTION PROCESS UPSET
• PRODUCT RECALLS
• ACCIDENTAL SPILLS
• ACTS OF NATURE (HURRICANE, FLOOD, TORNADO)
UNPLANNED SCENARIO

DIASTER CHEMICAL CO. – MANUFACTURE SPECIALTY CHEMICALS
GENERATES 1,200 LBS. OF HW IN ONE CALENDAR MONTH YEARLY
CURRENT CATEGORY: SQG     EPA ID #: NJD000111999

• SCENARIO: OVERFILL ALARM MALFUNCTION RESULTING IN A
  3,000-GALLON PRODUCT TANK OF SULFURIC ACID SPILL AND
  DISCHARGE OF SULFURIC ACID TO GROUND, APPROXIMATELY
  5,000-GALLONS LOST. OH NO!

Episodic Generation - Alternative Standards 11/7/2019
DIASTER CHEMICAL TANK OVERFILL & SPILL
DIASTER CHEMICAL – DO THEY QUALIFY FOR EPISODIC GENERATOR?

• YES – UNPLANNED EVENT THAT GENERATE HW EXCEEDING THEIR CATEGORY AS SQG

✓ 24-HOUR HOT LINE – REPORT THE SPILL OF A HAZARDOUS SUBSTANCE

✓ CALL NJDEP – REQUEST EPISODIC GENERATION OF SPILLED WITH 72 HOURS OF EVENT

✓ OVER 20,000 POUNDS OF D002 CORROSIVE REMOVED FROM PARKING LOT AREA WITHIN 24 HOURS OF SPILL

✓ SQG TO LQG GENERATION

✓ DIASTER CHEMICALS WILL STORE SPILLED MATERIAL ON SITE NOT TO EXCEED 60-DAYS FROM THE ONSET OF THE SPILL

✓ LABEL THE 55-GALLON DRUMS “EPISODIC WASTE” WITH START DATE AND PICTORIAL DESCRIPTION OF WASTE CHARACTERISTICS
VSQG – MAINTAIN ITS EXISTING GENERATOR CATEGORY PROVIDED THE GENERATOR COMPLIES WITH THE FOLLOWING:

➢ ONE EPISODIC EVENT PER CALENDAR YEAR, UNLESS A PETITION IS GRANTED
➢ NOTIFY EPA/DEP NO LATER THAN 30 DAYS PRIOR TO EVENT BY FILING EPA 8700-12 FORM
➢ MUST POSSESS OR MUST OBTAIN AN USEPA ID NUMBER
➢ PROHIBITED FROM ACCUMULATING HW ON DRIP PADS AND IN CONTAINMENT BUILDINGS
CONTAINER LABELING

LABEL EACH EPISODIC CONTAINERS AND INDICATE THE HAZARD

✓ “EPISODIC HAZARDOUS WASTE”
✓ IGNITABLE
✓ CORROSIVE
✓ REACTIVE
✓ TOXIC
✓ MARK THE DATE THE EPISODIC EVENT BEGAN
✓ CLEARLY VISIBLE TO SEE

Episodic Generation - Alternative Standards
VSQG ACCUMULATING HW IN TANKS

• MARK OR LABEL THE TANK WITH THE WORDS “EPISODIC HAZARDOUS WASTE”

• IDENTIFY THE DATE UPON THE EPISODIC EVENT BEGINS (INVENTORY LOGS OR OTHER RECORDS ARE ACCEPTABLE)

• DOCUMENTS MUST BE KEPT ON SITE FOR INSPECTION
EG REQUIREMENTS FOR HW MANAGEMENT

• CONTAINERS IN GOOD CONDITION, CLOSED, NO RELEASES TO AIR, SOIL, OR WATER

• TANKS IN GOOD CONDITION, OVERFLOW SYSTEM, INSPECTED ONCE EACH OPERATING DAY, AND MUST OPERATE ACCORDING TO ITS DESIGN
HW MANIFEST WASTE OFF SITE

• COMPLY WITH HAZARDOUS WASTE MANIFEST REQUIREMENTS

• SEND TO A DESIGNATED TSD FACILITY
60-DAYS LIMITATION FOR VSQG & SQG

• FROM START OF EPISODIC EVENT TO OFF SITE TSD = 60 DAYS OR LESS FOR ON-SITE STORAGE
RECORDKEEPING FOR VSQG & SQG

- MAINTAIN RECORDS ON SITE
- IDENTIFY BEGINNING AND END DATES OF EPISODIC EVENT
- DESCRIPTION OF EVENT
- DESCRIPTION OF TYPES AND QUANTITIES OF HW GENERATED
- DESCRIPTION OF TSD RECEIVING THE WASTES
- NAME OF TRANSPORTERS
- IF EPA APPROVED, LETTER TO CONDUCT ONE ADDITIONAL EPISODIC EVENT PER CALENDAR YEAR
EPISODIC GENERATOR FOR SQG

• ONE EPISODIC EVENT PER CALENDAR YEAR (UNLESS PETITIONED IS GRANTED 262.233)

• NOTIFY 30 DAYS PRIOR TO PLANNED EPISODIC EVENT
LABELS ON CONTAINERS

• THE WORDS “EPISODIC HAZARDOUS WASTE”

• HAZARDOUS WASTE CHARACTERISTICS
  • IGNITABLE
  • CORROSIVE
  • REACTIVE
  • TOXIC
  • DOT LABELING OR PLACARDING
  • HAZARDOUS STATEMENT OR PICTOGRAM (OSHA) OR NATIONAL FIRE PROTECTION (NFPA CODE)
  • DATE OF GENERATION CLEARLY VISIBLE FOR INSPECTION ON EACH CONTAINER
SQG EPISODIC GENERATION FOR TANKS

- THE WORDS “EPISODIC HAZARDOUS WASTE”
- HAZARDOUS WASTE CHARACTERISTICS
  - IGNITABLE
  - CORROSIVE
  - REACTIVE
  - TOXIC
  - DOT LABELING OR PLACARDING
  - HAZARDOUS STATEMENT OR PICTOGRAM (OSHA) OR NATIONAL FIRE PROTECTION (NFPA CODE)
- USE INVENTORY LOGS OR OTHER RECORDS TO IDENTIFY THE DATE UPON EACH PERIOD OF ACCUMULATION BEGINS AND ENDS AND KEEP LOGS ON SITE FOR INSPECTION
OFF-SITE DISPOSAL TIME LINE

• SHIP TO OFF SITE DESIGNATED FACILITY (TSD) WITHIN 60 DAYS FROM THE START OF THE EPISODIC EVENT
REGIONAL ADMINISTRATION PETITION

- Must include the following information
- Reason why an additional event is needed and the nature of the event
- Estimated amount of HW to be managed
- How the waste is going to be managed
- Estimated length of time needed to complete the management of the HW **NOT TO EXCEED 60 DAYS**
- Information on the previous episodic events – were they planned or unplanned and how the generator complied with the conditions
- Electronic or written petitions to the regional administrator
- Remain records for 3 years from date of the episodic event ending.
PETITION TO MANAGE ONE (1) ADDITIONAL EPISODIC EVENT PER CALENDAR YEAR

- 40 CFR 262.233 (a) (b) (c) and (d)—PETITION THE REGIONAL ADMINISTRATOR

- VSQG OR SQG PREPLANNED A EPISODIC EVENT IN CALENDAR YEAR, MAY PETITION AN UNPLANNED EPISODIC EVENT IN THAT CALENDAR YEAR WITH 72 HOURS OF THE UNPLANNED EVENT

- VSQG OR SQG ALREADY HELD AN UNPLANNED EVENT IN SAME CALENDAR YEAR, MAY PETITION FOR ADDITIONAL PLANNED EPISODIC EVENT
HELPFUL PHONE NUMBERS

• PHONE #: NJDEP COMMUNICATION CENTER HOT LINE
  24-HOUR A DAY, 7 DAYS A WEEK
  (1-877-WARN DEP) (1-877-927-6337)

□ CONTACTS: NORTHERN FIELD OFFICE - 973-656-4470
  CENTRAL FIELD OFFICE - 609-292-3962
  SOUTHERN FIELD OFFICE - 856-614-3658
THANK YOU!