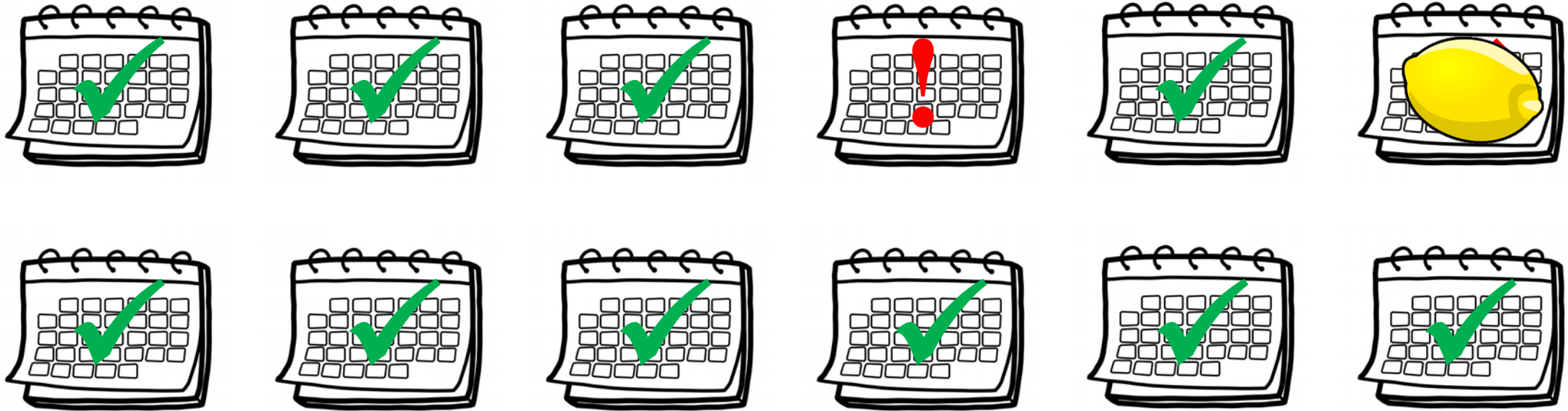


# Waste Generation: Episodic Events



# Resources

## Alternative Standards for Episodic Generation

- R315-262-230 through 233

# Episodic Generation Basics

Allow VSQGs and SQGs to generate more waste than their category allows without changing categories

Two Types of Events: Planned and Unplanned

Generators can have One Event per Year, and petition for a Second of the Other Type

We have a Guidance Document on our website

<https://documents.deq.utah.gov/waste-management-and-radiation-control/hazardous-waste/DSHW-2019-001401.pdf>

**This only works if you FOLLOW THE RULES and DOCUMENT**



# Utah Division of Waste Management and Radiation Control

Interactive Map

E-Z Records Search

- Environmental Cleanups
- Generator Site Access
- Hazardous Waste**
- Low Level Radioactive Waste
- Radioactive Materials
- Recycling
- Solid Waste
- Uranium Mills
- Used Oil



## Hazardous Waste

[DEA Pharmaceutical / Medicine Public Disposal Locations](#)

[Examples of Hazardous Waste Pharmaceuticals](#)

[E-cigarette Waste Management Guidance for Utah Schools](#)

[E-Cigarette Waste Management Guidance for Utah Retailers](#)

[Generator Training](#)

[Battery Recycling Info](#)

[HW Inspection Checklists](#)

[Satellite Accumulation Area Guidance](#)

[Episodic Generator Fact Sheet](#)

[Very Small Quantity Generator Fact Sheet](#)

## Hazardous Waste Management Program

The Division provides a Division must submit periodic updates outreach program for small businesses that generate less than 2,200 pounds of hazardous waste per month. This program has been successful in helping small businesses understand the requirements necessary for compliance with the hazardous waste management rules specific to small business.

Each year approximately 150 companies are visited using this program. A [checklist](#) (2 MB) is provided to assist the company with their hazardous waste management practices. Additionally, [hazardous waste inspection checklists](#), factsheets, and other information to help your company ensure compliance with the regulations can be found in this page's left menu. Hazardous waste staff are available to answer questions: (801) 536-0200.

In conjunction with the outreach program, Judy Moran ([jmoran@utah.gov](mailto:jmoran@utah.gov)) (801) 536-0255 provides basic hazardous waste training sessions (about two hours) for businesses. They also provide presentations on hazardous waste management and pollution prevention for schools (all levels) and community groups.

### EPA ID Number

If you need to notify of regulated waste management activities including new notifications, changes in your waste generation, notification of hazardous secondary materials activity, episodic generation, or consolidation of VSQG hazardous waste, then use the following links:

- Submit your RCRA Subtitle C 8700-12 forms electronically using the RCRInfo Industry Application. No more printing, signing, or mailing. Enter and submit your data on-line, and receive an email notification when your data has been accepted. [Click here](#) (77 MB) to find out how!
- [RCRA Subtitle C Reporting Instructions and Forms, EPA Forms 8700-12, 8700-13 A/B, 8700-23](#) (2 MB)
- [RCRA Subtitle C Site Identification Form \(8700-12 form only\)](#) (1 MB)

Signed forms may be emailed to Kaci McNeill ([kmcneill1@utah.gov](mailto:kmcneill1@utah.gov)).

### e-Manifest

EPA has established a national system for tracking hazardous waste shipments electronically. This system, known as "e-Manifest," modernizes the nation's cradle-to-grave hazardous waste tracking process while saving valuable time,

### Hazardous Waste Generator Training

Please join the Utah Division of Waste Management and Radiation Control for a free two-day virtual training session for hazardous waste generators. The training is to familiarize hazardous waste generators with applicable rules in Titles R315 and R317 of the Utah Administrative Code.

The training will be conducted during two part-day sessions on Zoom.

- Session 1: 9:00 am to 3:00 (there will be a lunch break) – Tuesday, May 17th
- Session 2: 9:00 am to noon – Wednesday, May 18th
- [Draft agenda](#)
- [Zoom Registration](#)

You will automatically be registered for both sessions. Once you register, you will receive an access link for the meeting that is individual to you. The unique access link cannot be shared.

If you have questions regarding the training or Zoom access, please contact Kari Lundeen at [klundeen@utah.gov](mailto:klundeen@utah.gov).

### Menu:

- [Hazardous Waste Permitting and Compliance](#)



## 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](mailto: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](mailto: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.

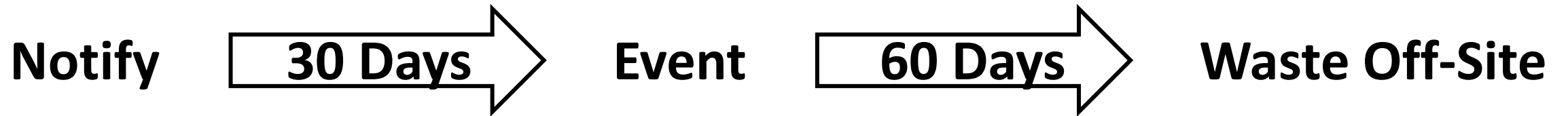
### What if I have 2 events in a calendar year?

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

Quantity of Acute Hazardous Waste	Quantity of Non-Acute Hazardous 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

	SQGs	VSQGs
1. The generator must notify the Director at least 30 calendar days prior to initiating a planned event using <a href="#">EPA Form 8700-12</a> .	✓	✓
2. The generator must notify the Director within 72 hours of an unplanned event via phone, email, or fax and subsequently submit <a href="#">EPA Form 8700-12</a> .	✓	✓
3. Notifications must include:		
A. The start and end dates of the event.	✓	✓
B. The reasons for the event.	✓	✓
C. The types and estimated quantities of waste.	✓	✓
D. The facility contact and an emergency coordinator with 24-hour phone access.	✓	✓
4. Accumulation of episodic hazardous waste is prohibited on drip pads and in containment buildings.		
5. Waste in Containers and Tanks must be labeled with:		
A. The words "Episodic Hazardous Waste."	✓	✓
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.		
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).		
13. VSQGs have up to 60 calendar days to manifest and send episodic hazardous waste to a designated facility.		
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.	✓	✓
B. A description of the types and quantities of the hazardous waste generated.	✓	✓
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.	✓	✓

# Planned Episodic Events



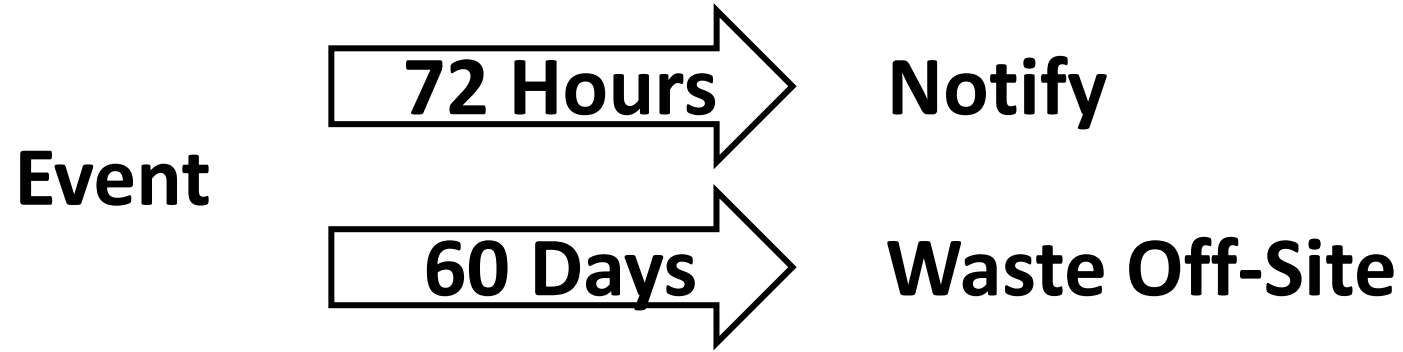
Follow our Guidance Document

- Use Form 8700-12

60 Day Clock Starts on Day 1 of the Event

Document!

# Unplanned Episodic Events



Follow our Guidance Document

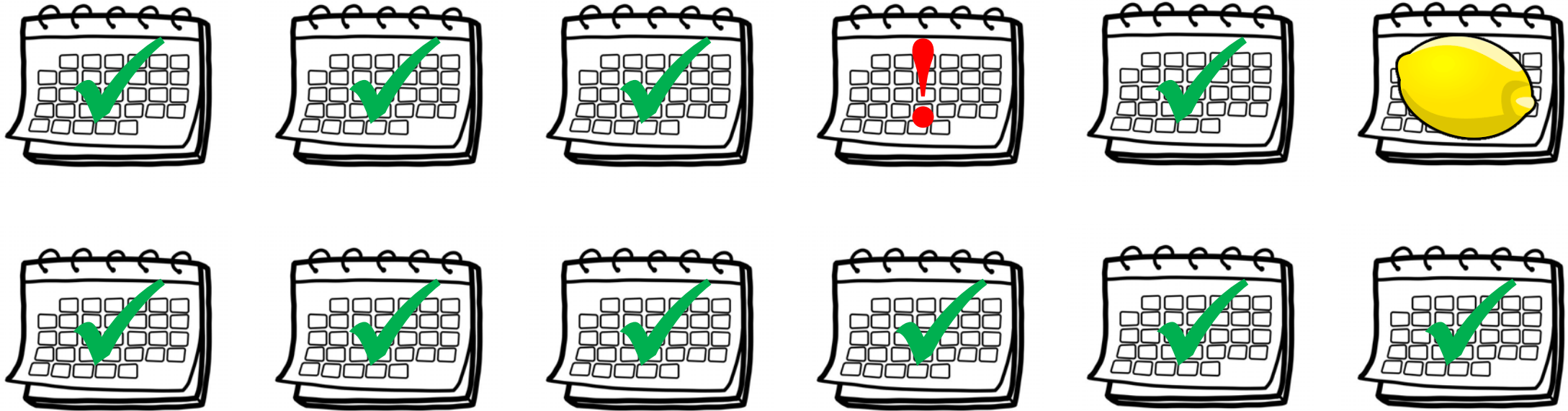
- Initial contact can be phone or email
- Follow up using Form 8700-12

60 Day Clock Starts on Day 1 of the Event

Document!



# Planned and Unplanned Event



# Final Thoughts

Must Notify of a Planned Episodic Event at least 30 days Prior to the Event

Must Notify of an Unplanned Episodic Event at least 72 hours after the Event

By default, you get one Episodic Event per year, but you can petition for a second

Use the Guidance Document on our website

<https://documents.deq.utah.gov/waste-management-and-radiation-control/hazardous-waste/DSHW-2019-001401.pdf>

