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# Episodic Events

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UTAH DEPARTMENT of  
ENVIRONMENTAL QUALITY  
**WASTE MANAGEMENT  
& RADIATION CONTROL**

# Episodic Generation

## Hazardous Waste Generator Categories

- **Large Quantity Generator (LQG) – More than 2,200 lbs/month**
- **Small Quantity Generator (SQG) – More than 220 but less than 2,200 lbs/month**

Acute hazardous waste – Less than 2.2 lbs/month

- **Very Small Quantity Generator (VSQG) – Less than 220 lbs/month**

Acute hazardous waste – Less than 2.2 lbs/month





# Episodic Generation

**Applicable only to Small Quantity Generators (SQGs)  
and Very Small Quantity Generators (VSQGs)**

**Utah Administrative Code  
R315-262-230 through 233**



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# Definitions

"Episodic event" means an activity or activities, either planned or unplanned, that does not normally occur during generator operations, resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category.

"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





# Episodic Generation Basics

Allows 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 Planned Event per year and petition for a second (unplanned) event.

We have a Guidance Document on our website

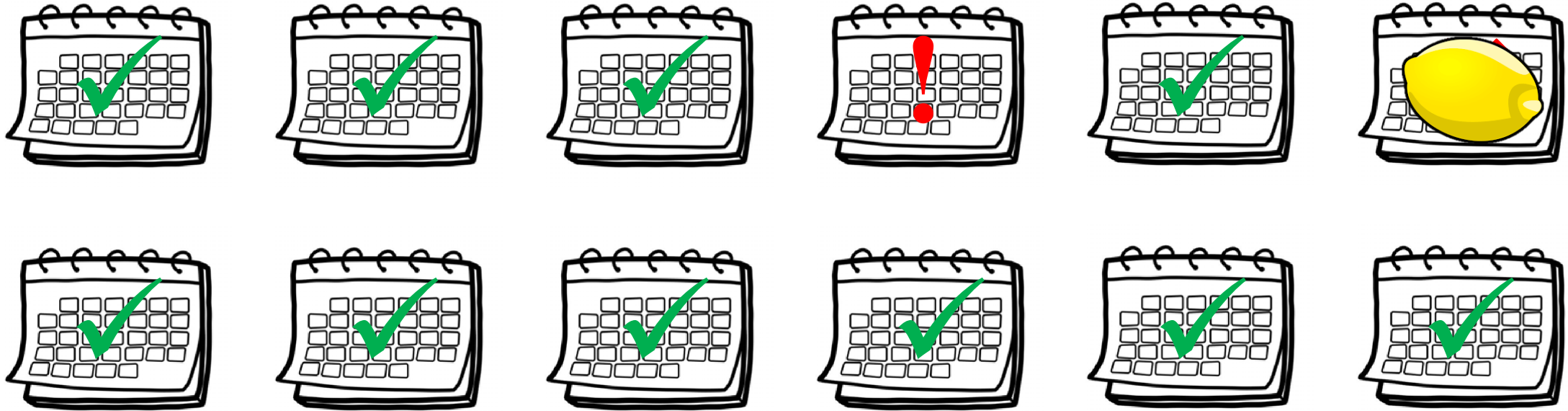
<https://documents.deq.utah.gov/waste-management-and-radiation-control/hazardous-waste/DSHW-2019-001401.pdf>

This only works if you FOLLOW THE RULES and DOCUMENT



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# Hazardous Waste Generation: Episodic Events



Petition the Director in writing according to Utah  
Administrative Code R315-262-233

EPA Form 8700-12 kmcneill1@utah.gov










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# Utah Division of Waste Management and Radiation Control

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 Solid Waste	 Uranium Mills	 Used Oil

<https://deq.utah.gov/division-waste-management-radiation-control>



DEA Pharmaceutical / Medicine Public Disposal Locations

Disposal of E-Cigarette Waste

Examples of Hazardous Waste Pharmaceuticals

Generator Training

Battery Recycling Info

HW Inspection Checklists

Satellite Accumulation Area Guidance

Guidance for Hazardous Waste Pharmaceuticals

EPA 10-Step Blueprint for Managing Pharmaceutical Waste in US Healthcare Facilities

Episodic Generator Fact Sheet

The Division provides an 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 50 companies are visited using this program. A [checklist](#) 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)), (385) 499-0184 or Erika Greenwell ([egreenwell@utah.gov](mailto:egreenwell@utah.gov)), (385) 499-0346 will provide 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.

### Past Hazardous Waste Generator Training

EPA ID Number

e-Manifest

RCRAINFO Industry Application

Biennial Hazardous Waste Report

Authorization

Rule Making

Hazardous Waste Handlers

EPA ID Number

If you need to notify the Division 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 RCRA Info 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](#) to find out how!
- [RCRA Subtitle C Reporting Instructions and Forms, EPA Forms 8700-12, 8700-13 A/B, 8700-23](#)
- [RCRA Subtitle C Site Identification Form \(8700-12 form only\)](#)

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

Questions





## 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.	✓	✓

# Summary

Must notify of a Planned Episodic Event at least 30 days prior to the event.

Must notify of an Unplanned Episodic Event at least within 72 hours after the event.

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

Minimum of 60 days to get the Episodic Event Hazardous Waste offsite.

(Clock starts on day 1)



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# Questions?

Thank you and please feel free to reach out to the Division with any questions.

Division of Waste Management and Radiation Control  
801-536-0200

Sally Kaiser 385-499-4929



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