

Episodic Hazardous Waste Generator Requirement Guidance

Episodic Large Quantity Hazardous Waste Generators are defined as hazardous waste generators that normally generate conditionally exempt small quantity hazardous waste generator (CESQG) amounts (less than 220 lbs/month) or small quantity hazardous waste amounts (SQG) amounts (greater than 220 lbs/month and less than 2,200 lbs/month); **and once or twice/year (*episodically*), generate greater than 2,200 lbs/month of hazardous waste.**

EPA has determined that **Episodic LQG Hazardous Waste Generators** must comply with all applicable hazardous waste generator requirements for that particular generator class for the waste generated in that particular month for as long as that waste remains onsite.

For **Episodic Large Quantity Generators**, the department has determined that the following generator requirements are applicable and required:

1. Identification of hazardous waste (HWRR, Chapter 1, Section 262 (262.11)). You first must determine whether you have a waste, and if so, then is it a hazardous waste either by being specifically listed in the HWRR or does it exhibit a hazardous waste characteristic (Ignitable, Corrosive, Reactive or TC Toxic).
2. The hazardous waste can only be stored for up to 90 days [HWRR, Chapter 1, Section 262 (262.34)(a)]. ***This requirement only applies if you have hazardous wastes currently being stored onsite.***
3. The hazardous waste containers must be properly labeled "Hazardous Waste" and they must be clearly dated with the date that wastes were first placed into the drum. [HWRR, Chapter 1, Section 262 (262.34)(a)(2) & (a)(3)] ***This requirement only applies if you have hazardous wastes currently being stored onsite.***
4. ***You must comply with the following requirements only for the amount of time the hazardous waste is being stored onsite:***
 - a) Ignitable or reactive waste must be stored at least 50' from the facility property line;
 - b) Hazardous waste in a leaking container must be transferred to a container in good condition or managed in another acceptable way;
 - c) The hazardous waste container must be compatible with the waste being stored;
 - d) The hazardous waste container must be closed during storage except when adding or removing waste;
 - e) Any incompatible wastes must be properly managed in accord with the Large Quantity Generator checklist.
5. Hazardous waste manifest records of the waste shipment must be kept for a minimum of 3 years. [HWRR, Chapter 1, Section 262 (262.40)(a)]
6. You are required to conduct weekly inspections of the hazardous waste containers ***but only for the time that the waste remains onsite.*** [HWRR, Chapter 1, Section 262 (262.34)(a)(1)(i); Section 265 (265.174)]
7. You must file a copy of the biennial report (BRS) with the State DEQ by March 1st of every even numbered year covering the episodic waste generation activities during the previous year.

[HWRR, Chapter 1, Section 262 (262.41)(a)] You must keep a copy of this onsite for 3 years.

However, the report would only need to cover those months in which the generator activities have changed.

8. You must keep a copy of any land disposal restriction (LDR) notices for each hazardous waste shipment for 5 years. You must also keep a copy of any waste test results and/or process knowledge used to make the hazardous waste determination for 3 years. [HWRR, Chapter 1, Section 268 (268)].
9. You must comply with all of the applicable personnel training requirements as described on the Large Quantity Hazardous Waste Generator checklist ***but only for the time that the waste is generated and being managed. Therefore, if the waste is generated once/5 years, the training would be required once every 5 years.***
10. The required contingency plan containing all required items (see Large Quantity Hazardous Waste Generator checklist) must be onsite during the time when LQG waste amounts are being managed. [HWRR, Chapter 1, Section 265 (265.50)]
11. You must comply with the Preparedness & Prevention requirements listed in the Large Quantity Hazardous Waste Generator checklist only ***for as long as the waste remains onsite.***

Attachment: Large Quantity Generator Checklist