



IDAHO
DEPARTMENT OF
ENVIRONMENTAL
QUALITY

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(208) 373-0502

www.deq.idaho.gov

Episodic Generators of Hazardous Waste

The US Environmental Protection Agency (EPA) finalized a rule that revises the hazardous waste generator regulations by making them easier to understand and providing greater flexibility in how hazardous waste is managed to better fit today's business operations. The Generator Improvements Rule was adopted by the Idaho Department of Environmental Quality (DEQ) and became effective in Idaho on March 28, 2018.

New provisions in the rule allow a very small quantity generator (VSQG) or a small quantity generator (SQG) to maintain its existing generator status in the case of an event where the VSQG or SQG generates a quantity of hazardous waste in a calendar month that would otherwise bump the generator into a more stringent regulatory category. Under this provision known as "Alternative Standards for Episodic Generation" (see [40 CFR 262.230-233](#)), generators that satisfy the listed conditions do not have to comply with the more stringent federal generator standards when an unusual event such as a cleanout or an act of nature causes its generator status to temporarily increase.

A VSQG or SQG is allowed one episodic event per calendar year, unless an eligible generator petitions DEQ and receives approval to add one additional episodic event during a calendar year. For specifics on the petition process, see 40 CFR §260.33.

A generator must have or obtain an EPA identification number to use the episodic generator provisions. See www.deq.idaho.gov/waste-mgmt-remediation/hazardous-waste/epa-identification-number for more information.

Notifications

- For a planned event, notify DEQ at least 30 days prior to the event.
- For an unplanned event, notify DEQ within 72 hours of the beginning of the event by phone, email, or fax and subsequently submit the required form.

Accumulation in Containers

- A generator is prohibited from accumulating episodic waste on drip pads or in containment buildings.
- Containers must be in good condition.
- Each container must be marked with the following:
 - "Episodic Hazardous Waste"
 - An indication of the hazards of the contents
 - The date the episodic event began

Accumulation in Tanks

- Tanks must be in good condition and compatible with the hazardous waste being stored.
- Each tank must be marked "Episodic Hazardous Waste."
- Each tank must be marked or labeled to indicate the hazards of the contents.
- The generator must maintain inventory logs, monitoring equipment, or other records to identify the date each episodic event began.

Management of Episodic Waste

- Within 60 calendar days of the start of the episodic event, a VSQG must manifest and ship hazardous waste generated from the episodic event to a designated facility.
- Within 60 calendar days of the start of the episodic event, an SQG must treat hazardous waste generated from the event on site or manifest and ship the hazardous waste off site to a designated facility.

Records

- Maintain the following records for 3 years from the end of the episodic event:
 - Beginning and end dates of the event
 - Description of the event
 - Description of the types and quantities of wastes generated during the event
 - Description of how the hazardous waste was managed and the name of the Resource Conservation and Recovery Act-designated facility that received the waste
 - Names of hazardous waste transporters
 - Approval letter from DEQ if petitioned for an additional event

Reporting

- An Idaho VSQG who uses the episodic generator provisions will be required to submit a hazardous waste annual report to DEQ. (See www.deq.idaho.gov/waste-mgmt-remediation/hazardous-waste/hazardous-waste-reporting for more information.)
- An Idaho SQG is required to submit a hazardous waste annual report regardless of whether the episodic generator provisions are used.

For More Information

For specific questions, please contact the DEQ Hazardous Waste Unit at (208) 373-0502 or your nearest DEQ regional office:

Boise Regional Office

(208) 373-0550

Toll-free: (888) 800-3480

Coeur d'Alene Regional Office

(208) 769-1422

Toll-free: (877) 370-0017

Idaho Falls Regional Office

(208) 528-2650

Toll-free: (800) 232-4635

Lewiston Regional Office

(208) 799-4370

Toll-free: (877) 541-3304

Pocatello Regional Office

(208) 236-6160

Toll-free: (888) 655-6160

Twin Falls Regional Office

(208) 736-2190

Toll-free: (800) 270-1663