

Hazardous Waste Management

Alternative Standards For Episodic Generation of Hazardous Waste

Information presented in this fact sheet is intended to provide a general understanding of the regulatory requirements governing the episodic generation of hazardous waste. This information is not intended to replace, limit, or expand upon the complete regulatory requirements found in Division 14 of the Alabama Department of Environmental Management Administrative Code.

BACKGROUND

If your facility is a very small quantity generator (**VSQG**) or a small quantity generator (**SQG**), as defined in 335-14-1-.02., you may opt to handle hazardous waste generated during an episodic event under the rules found at ADEM Admin. Code r. 335-14-3-.13.

These rules allow your facility to maintain its existing generator status provided that you comply with the following conditions:

1. You may manage hazardous waste generated during an episodic event once per calendar year, under most circumstances.
2. Your facility must have, or obtain, an EPA identification number before you can use these rules.
3. For a **planned** episodic event, you must notify the Department at least thirty (30) calendar days prior to initiating the event by submitting an ADEM Form 8700-12.
4. In the event of an **unplanned** episodic event, you must notify the Department within 72 hours of the event via phone, email, or fax and subsequently submit ADEM Form 8700-12.
5. Your notification must include the start date and end date of the episodic event, the reason(s) for the event, and the types and estimated quantities of hazardous waste expected to be generated as a result of the episodic event. You must also identify a facility contact and an emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to an emergency.
6. You must manage the hazardous waste in a manner that minimizes the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to the air, soil, or water.
7. You may accumulate hazardous waste generated from an episodic event only in containers or tanks.
8. Containers and tanks must be in good condition and compatible with the hazardous waste being accumulated therein.
9. If episodic hazardous waste is accumulated in containers:
 - The containers must be kept closed except to add or remove waste.
 - The containers must be marked or labeled with the words “Episodic Hazardous Waste”, the applicable EPA hazardous waste numbers, an indication of the hazards of the contents, and the date upon which the episodic event began.
 - These markings must all be clearly visible for inspection on each container.
10. If episodic hazardous waste is accumulated in tanks:
 - The tanks must be marked or labeled with the words “Episodic Hazardous Waste”, the applicable EPA hazardous waste numbers, and an indication of the hazards of the contents.
 - Have procedures in place to prevent any overflow.
 - The tanks must be inspected at least once each operating day to ensure all applicable discharge control equipment, such as waste feed cutoff systems, bypass systems, and drainage systems are in good working order.
 - Operate tanks according to design; review the data gathered from monitoring equipment such as pressure and temperature gauges from the inspection.
 - You must use inventory logs, monitoring equipment or other records to identify the date upon which each episodic event begins.
 - You must keep these logs or records with the above information on site and readily available for inspection.
11. You must prepare a hazardous waste manifest when you send episodic hazardous waste off site to a designated facility.

12. You must send all episodic hazardous waste off site within sixty (60) calendar days from the start of the episodic event.
13. You must retain the following records for three (3) years from the end date of the episodic event:
 - Beginning and end dates of the episodic event;
 - A description of the episodic event;
 - A description of the types and quantities of hazardous wastes generated during the event;
 - A description of how the hazardous waste was managed as well as the name of the RCRA-designated facility that received the hazardous waste;
 - Name(s) of hazardous waste transporters; and
 - An approval letter from the Department if you petitioned to conduct an additional event during that same year.

PETITION TO MANAGE ONE ADDITIONAL EPISODIC EVENT PER CALENDAR YEAR

1. You may petition the Department for a second planned or unplanned episodic event in a calendar year without impacting your generator category, provided you submit a written petition to the Department and obtain written approval.

Note: A facility may only have one planned and one unplanned episodic event in a calendar year.

2. Your petition must include the following information:
 - The reason(s) an additional episodic event is needed;
 - The nature of the event;
 - The estimated amount of hazardous waste to be managed from the event;
 - How the hazardous waste is to be managed;
 - The estimated time needed to complete management of the hazardous waste – not to exceed sixty (60) days; and
 - Information regarding the previous episodic event managed by the generator, including the nature of that event, whether it was a planned or unplanned event, and how the generator complied with the conditions.
3. You must retain written approval in your records for three (3) years from the date the episodic event ended.

WHERE CAN I GET ADDITIONAL INFORMATION?

ADEM Administrative Code Division 14 - <http://www.adem.alabama.gov/alEnviroRegLaws/files/Division14.pdf>

ADEM Guidance - <http://www.adem.state.al.us/programs/land/guidanceReports.cnt>:

Hazardous Waste Determination
Notification of Regulated Waste Activity



Telephone Resources

ADEM Ombudsman - - - - - 800-533- 2336
Hazardous Waste Compliance Inspectors - - - 334-271-7730

