



The Do's and Don'ts of Managing Generator EPA Identification and Notification

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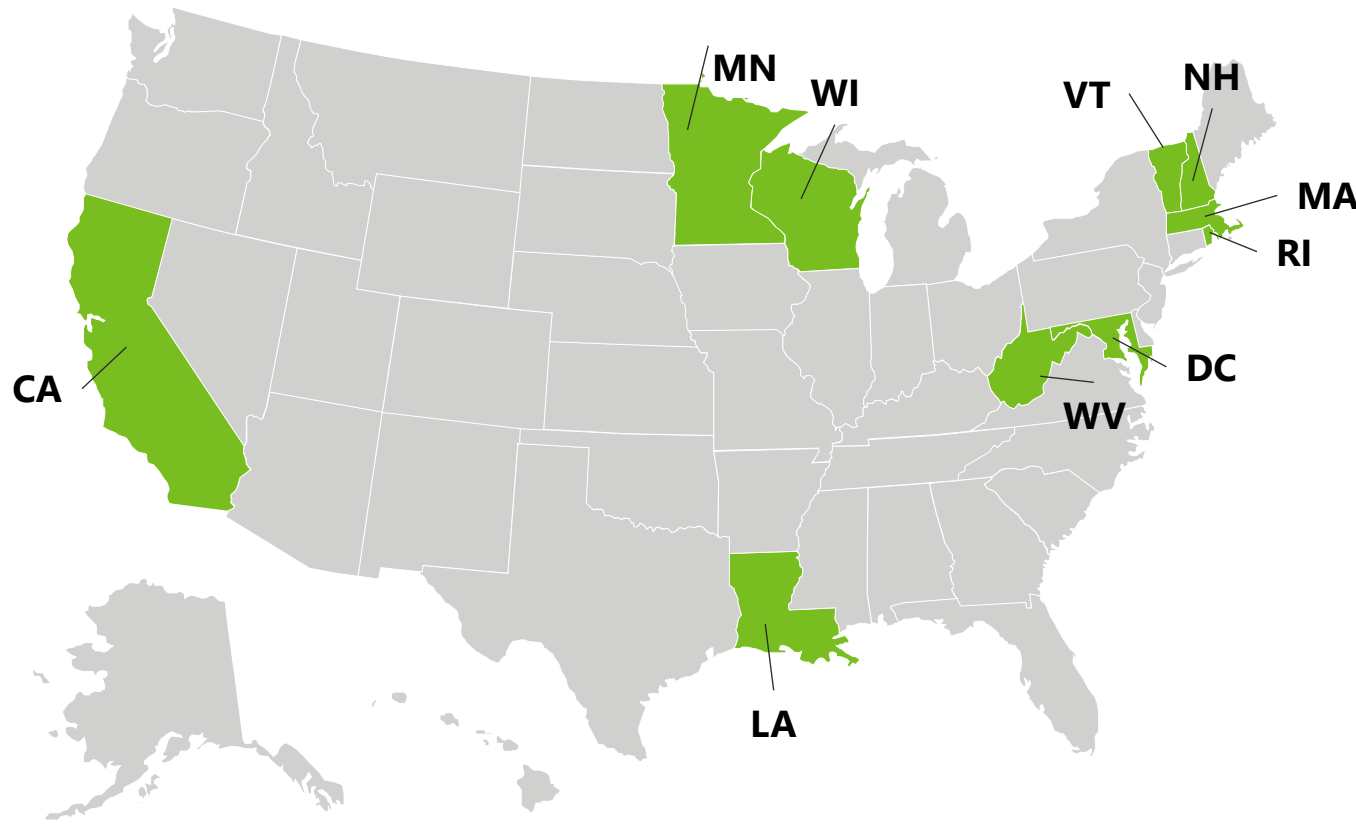
INTRODUCTION

1. EPA Notification Information
2. EPA Identification Notification Process
3. EPA Generator Improvement Rule
4. Electric versus Paper Notifications
5. Best Practices
6. Q&A



EPA NOTIFICATION INFORMATION

There are currently ten states that require VSQG generators to maintain EPA identification numbers:



- All small quantity and large quantity generators are required to obtain an EPA identification number regardless of the state they operate in.
- The EPA application form is defined as the 8700-12; the form is available in an electronic format in RCRAInfo. In order to file an electronic notification, you will have to setup a RCRAInfo account.
- California offers a state application known as form 1358 for generators to obtain a state EPA identification versus a federal. California federal identification numbers are issued by completing the federal 8700-12 form.

EPA IDENTIFICATION NOTIFICATION PROCESS

- California offers a state application known as form 1358 for generators to obtain a state EPA identification versus a federal number. California federal identification numbers are issued by completing the federal 8700-12 form.
- The notification form requires the generator to provide the state agency with the following information:

Generator DBA _____

(name, address, city, state, county)

NAICS code _____

(North American Industry Classification System)

Mailing address _____

(recommendation to use a central mailing address for all notifications)

Contact person _____

Legal Operator _____

Legal Property Owner _____

Generator Status _____

(VSQG, SQG, or LQG)

EPA GENERATOR IMPROVEMENT RULE

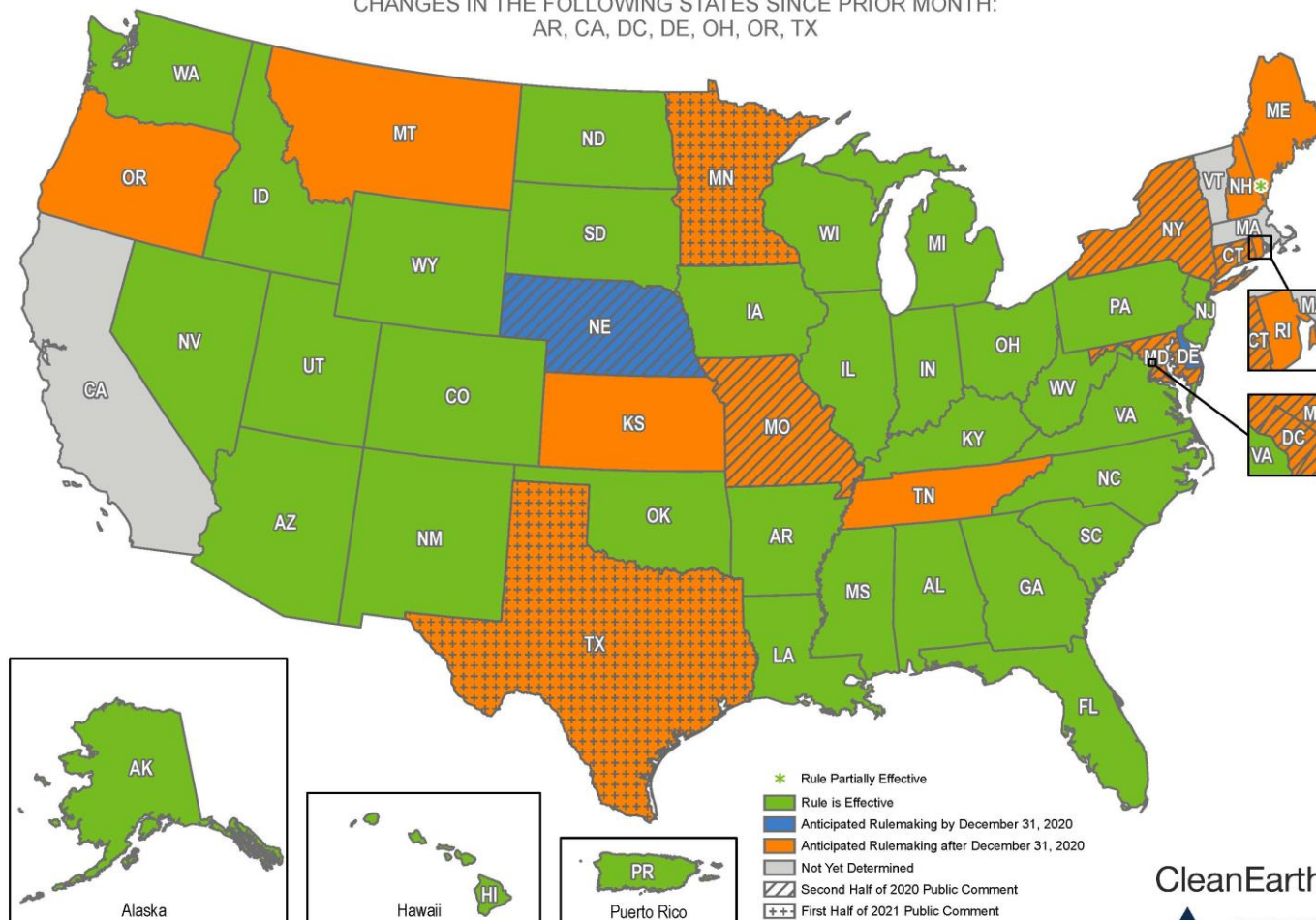
- Extended the original 8700-12 form from four pages to six pages.
- Form includes episodic generation, pharmaceutical activity, and notification of site closure.
- Generator can only apply for episodic generation via paper format; notification is not available electronically.
- All generators are allotted one planned and one unplanned episodic event per calendar year. Excess chemical inventory, cleanout, short term construction are examples of planned episodic events. Waste accumulated from spills, product recall, and acts of nature would be defined as an unplanned episodic event.
- Generators are required to notify the state agency within 60 days of the event transpiring. The application process requires a description of the waste, an estimated amount in pounds, and applicable waste codes.

EPA GENERATOR IMPROVEMENT RULE

HAZARDOUS WASTE GENERATOR IMPROVEMENTS RULEMAKING STATUS

CHANGES IN THE FOLLOWING STATES SINCE PRIOR MONTH:

AR, CA, DC, DE, OH, OR, TX



Status Date: 10/5/2020

Information contained on this map is subject to change as the rulemaking process continues for each state

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EPA GENERATOR IMPROVEMENT RULE

- Only VSQG and SQG generator qualify to apply for episodic generation. LQG generators do not qualify for episodic generator exemption.
- Subpart P notification are required 60 days prior to action and site closure notifications require dual submission; the first notification is due 30 days prior to site closing whereas the secondary notification is due 30 days after business has officially closed.
 - VSQG generators opting into Subpart P will need to obtain an EPA Identification number as part of the requirement.
- The generator improvement rule will require SQG generators are required to re-notify in 2021 and LQG generator renotify on even numbers as part of their biennial report.

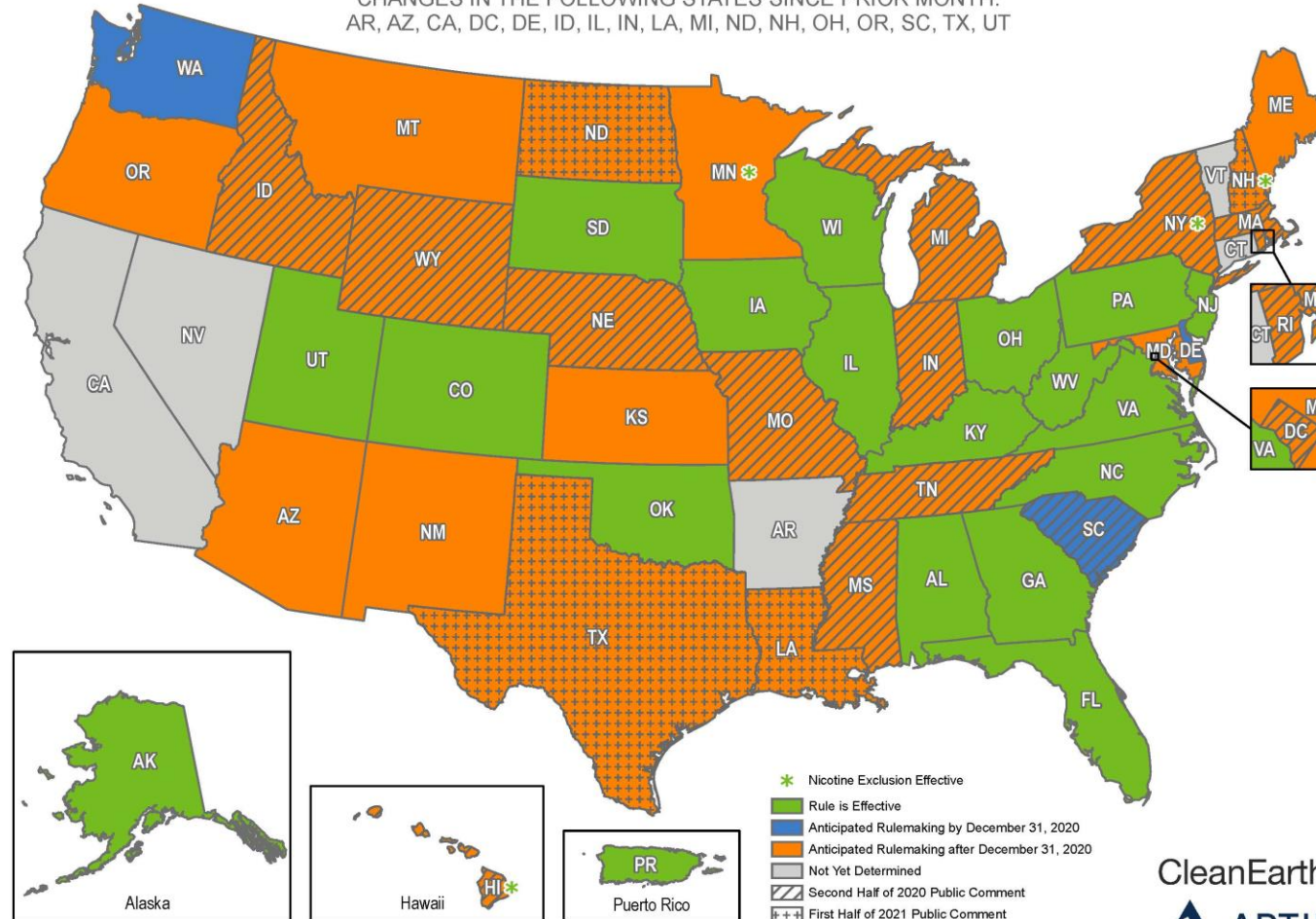
EPA ELECTRONIC VERSUS PAPER NOTIFICATIONS

- When notifying by paper the state requires 14 business days to process the application.
- Electronic notifications are submitted, and generator will receive an assigned EPA identification number within 7 days. All notifications are sent to RCRAInfo account owners email address for record keeping.
- Generator status change submission is maintained electronically and give generator visibility. When completed by paper require follow-up with state agency; state agency does not send out notifications for changes to generator status.
- Paper notification resource:
<https://rcrainfo.epa.gov/rcrainfoprod/action/public/public-site/state-contacts>.

EPA PHARMACEUTICAL RULE

PHARMACEUTICAL RULE RULEMAKING STATUS

CHANGES IN THE FOLLOWING STATES SINCE PRIOR MONTH:
AR, AZ, CA, DC, DE, ID, IL, IN, LA, MI, ND, NH, OH, OR, SC, TX, UT



Status Date: 10/5/2020

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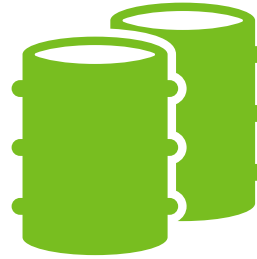
BEST PRACTICES



**Maintaining Waste
Logs at Your Facilities**



**Utilizing
Manifests to
Build Cases**



**Changing Your
Generator Status to in
Compliance with
Waste Disposal
Amounts**



**Misconceptions
About Change in
Generator Status
(inspections, fees,
and state reporting
requirements)**

Questions?

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