

Episodic generation is the term used when a small or very small quantity generator has an activity that does not occur during a generator's normal operations and that causes the generator to exceed the threshold for its normal generator category for that month.

Planned or Unplanned Episodic Event

Unplanned Episodic Events are events that the generator did not plan or reasonably expect to occur, such as a spill caused by a storm, damaged equipment, or a product recall.

Planned Episodic Events are events that the generator planned and prepared for, such as a clean out of a tank or laboratory, a short-term maintenance project, or a removal of excess inventory.



A generator can conduct one planned or unplanned episodic event in a calendar year and can submit a petition for a second event if necessary in the same calendar year. If the first event is planned, then any second event would have to be unplanned. If the first event is unplanned, any second event would have to be planned.

Episodic Event Timeframe: 60 Day Clock

Episodic events must not exceed 60 days. The clock begins on the first day of any activities affiliated with the event. For an unplanned episodic event, the event begins on the first day the hazardous waste is generated, regardless of whether the generator has completed analysis confirming that the waste is hazardous.

The 60 day clock ends when the waste is shipped off site for final management. If the episodically generated hazardous waste is not shipped off site within 60 days of the start of the event, the waste must be counted towards the site's monthly generator status.



(406) 444-5300, Ask for hazardous waste compliance assistance



<https://deq.mt.gov/twr/Programs/hazmat>



DeqHazWaste@mt.gov

EPISODIC EVENT STEPS AND REQUIREMENTS

- 1** Notify DEQ via the electronic myRCRAid system, or the 8700-12 Form, no later than 30 calendar days prior to the event. For unplanned events, notify DEQ within 72 hours and subsequently submit the 8700-12 Form within 7 calendar days of the event. A \$150 notification fee will be assessed in accordance with Administrative Rules of Montana (ARM) 17.53.113(8)(a).
- 2** Ensure you have an EPA Identification Number before initiating the shipment of generated hazardous waste.
- 3** Comply with the applicable hazardous waste management requirements during the time the waste is accumulated on-site.
- 4** Utilize a hazardous waste manifest and ship waste generated during the episodic event within 60 calendar days from the start of the episodic event.
- 5** Maintain records as required in 40 CFR 262.232(a)(7) for three years following the end date of the episodic event.



A normal occurrence of a generator's operations would not be considered an episodic event

Increased generation of hazardous waste due to an increased rate of production is not an episodic event

*The Code of Federal Regulations are incorporated by reference in the Administrative Rules of Montana (ARM) 17.53.601

For more information on hazardous waste determinations, categories and compliance, visit <https://deq.mt.gov/twr/Programs/hazmat>