

HAZARDOUS MATERIALS PROGRAM ENVIRONMENTAL FACT SHEET

Episodic Events

What is an Episodic Event?

An “**Episodic Event**” is an activity (or activities) that does not normally occur during operations causing the generator to create more waste, which could cause the generator to exceed the quantity limits for their current generator category. These events can either be **planned** (ex: regular maintenance, tank cleanouts, short-term projects, or removal of excess chemical inventory) or **unplanned** (including production errors, product recalls, accidental spills, fires, or “acts of nature,” such as a tornado, hurricane, or flood).

Note: Episodic Events only apply to [very small quantity generators \(VSQGs\)](#) and [small quantity generators \(SQGs\)](#). Episodic Events do not apply to [large quantity generators \(LQGs\)](#) or [household hazardous waste](#).

Do I have to be a hazardous waste generator to have an episodic event?

The Vermont Hazardous Waste Program may issue a temporary identification number to persons who have generated non-household hazardous waste only from an episodic event and are not otherwise notified as hazardous waste handlers.

Will an Episodic Event affect my waste generation rate?

No. If managed properly (see next question), wastes generated during episodic events do not affect generation rates.

What do I need to do for an Episodic Event?

Very small quantity generators and small quantity generators must:

- Notify the Vermont Hazardous Waste Program thirty (30) days prior to a planned episodic event and within 72 hours of an unplanned event using the [Hazardous Waste Handler Site Identification Form \(EPA Form 8700-12\)](#).
- Manage hazardous waste from an episodic event 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.
- Store hazardous waste from the episodic event in containers that are in good condition, compatible with the waste, and keep containers closed except to add or remove waste.
- Clearly label containers from the episodic event with the words “Episodic Hazardous Waste”, the hazards of the contents (via pictogram, statement, or placard), and the date upon which the episodic event began.
- Manifest and ship hazardous waste generated from an episodic event off site to a designated facility or treat on site in accordance with the conditions of **§ 7-502(o)**.
- Maintain 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 waste 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 Hazardous Waste Program if the generator petitioned to conduct one additional episodic event per calendar year.
- Within sixty (60) days from the start of the episodic event, hazardous wastes generated from the episodic event must be sent to a designated facility, complying with manifest requirements of § 7-702.

Please see **§ 7-312 MANAGING HAZARDOUS WASTE FROM AN EPISODIC EVENT** in [Subchapter 3](#) of our regulations.

What do I do if I have more than one Episodic Event per year?

If a very small quantity generator or small quantity generator has already held an **unplanned** episodic event in a calendar year, it may petition the Hazardous Waste Program for an additional **planned** episodic event in that same calendar year. Additionally, if a very small quantity generator or small quantity generator has already held a **planned** episodic event in a calendar year, the generator may petition the Secretary for an additional **unplanned** episodic event in that calendar year within 72 hours of the unplanned event.

The petition must include the following:

- The reason(s) why an additional episodic event is needed and the nature of the episodic event.
- The estimated amount of hazardous waste to be managed from the event.
- How the hazardous waste is to be managed.
- The estimated length of time needed to complete management of the hazardous waste generated from the episodic event—not to exceed sixty (60) days; and
- Information regarding the previous episodic event managed by the generator, including the nature of the event, whether it was a planned or unplanned event, and how the generator complied with the conditions.

Note: The petition must be made to the Vermont Hazardous Waste Program in writing, either on paper or electronically.

Are there any additional requirements for storing hazardous waste from an Episodic Event in tanks?

Yes, a very small quantity generator or small quantity generator must:

- Ensure tanks are in good condition and compatible with the hazardous waste stored therein.
- Clearly label tanks from the episodic event with the words “Episodic Hazardous Waste”, the hazards of the contents (via pictogram, statement, or placard), and the date upon which the episodic event began.
- Ensure tanks have overflow prevention (e.g., be equipped with a means to stop inflow with systems such as a waste feed cutoff system or bypass system to a standby tank when hazardous

waste is continuously fed into the tank).

- Inspect tanks 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 and to ensure the tank is operated according to its design by reviewing the data gathered from monitoring equipment, such as pressure and temperature gauges, from the inspection; and
- Maintain inventory logs, monitoring equipment or other records to identify the date where each period of accumulation begins and ends. These inventory records must be kept on site and available for inspection.

For more information regarding episodic events, or if you have other hazardous waste management questions, please contact:

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