

# Focus on: Episodic Generation

## Contact

Contact a dangerous waste specialist at your regional Ecology office:

**Northwest Regional Office**  
(425) 649-7000

**Southwest Regional Office**  
(360) 407-6300

**Eastern Regional Office**  
(509) 329-3400

**Central Regional Office**  
(509) 575-2490

## Special accommodations

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-407-6700 or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

An episodic event is an activity that does not normally occur during your operations, and results in a large amount of waste that exceeds your usual generator status.

If you are a small quantity generator (SQG) or medium quantity generator (MQG), you can manage qualifying episodic dangerous waste under [alternative standards](#)<sup>1</sup> (WAC 173-303-173) without it affecting your generator status.

Although your generator status remains the same, episodic waste still counts towards the [Hazardous Waste Planning Fee](#)<sup>2</sup> and [Pollution Prevention \(P2\) Planning](#).<sup>3</sup> This means you may still have to pay a fee and make a plan for reducing your waste in the future even though you don't report as a large quantity generator (LQG).

## Types of episodic events

The rules allow you to have one event per calendar year: either **planned** or **unplanned**. If you need another event during that year, you will have to petition for a second event of the opposite type and receive approval, prior to the event.

## Planned events

Planned episodic events include things you plan and prepare for, such as:

- Tank cleanouts.
- Short-term construction or demolition projects.
- Removing excess chemical inventory.
- Equipment maintenance during plant shutdowns.

<sup>1</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-173>

<sup>2</sup> <https://ecology.wa.gov/PlanningFee>

<sup>3</sup> <https://ecology.wa.gov/P2Plan>

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### Unplanned events

Unplanned episodic events include events you did not plan or reasonably did not expect to occur, such as:

- Accidental spills.
- Product recalls.
- Production process upsets.
- Acts of nature.

### Activities that do not qualify as episodic events

- Remediation or removal of contaminated soils from an active cleanup site.
- Designated wastes accumulated over a long period of time. For example, stockpiled waste containers and drums of dangerous waste or expired chemicals that you had no intention of using.
- Increased generation of dangerous waste due to an increased rate of production from routine operations.

### How to get started

Before you get started, keep in mind that:

- You must submit notification for a planned episodic event at least 30 days before the event begins. However, we **recommend 60 days** so we can make sure the form is properly completed.
  - If we receive your form less than 30 calendar days before the proposed start date, we will change your start date to meet the minimum 30 calendar day requirement.
- Beginning and end dates can't be changed or revised after we process your paperwork.
- Episodic event notifications cannot be canceled or withdrawn.
- Your episodic event may include more than one project. However, once you have submitted the notification form you cannot add more projects to the event.

You must have an active EPA/State Identification Number before managing dangerous waste as episodic.

### If you do not have a number

- Submit a [Site Identification Form](#)<sup>4</sup> and the [Episodic Generation Addendum](#).<sup>5</sup>

### If you have a number

- Fill out an updated pre-printed Site ID form (from TurboWaste) and the Episodic Generation Addendum.

<sup>4</sup> <https://fortress.wa.gov/ecy/publications/SummaryPages/ECY070133.html>

<sup>5</sup> <https://fortress.wa.gov/ecy/publications/summarypages/ecy070602.html>

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### When to submit your forms

#### Planned events

- Submit your forms at least 30 days before you plan to start your event. But we **recommend 60 days** so we can make sure the form is properly completed.
  - If we receive your form less than 30 calendar days before the proposed start date, we will change your start date to meet the minimum 30 calendar day requirement.
- You may not begin generating waste as part of the episodic event until the event beginning date you provided in the notification form.
- If this is your second event, don't start until you receive an approval letter from Ecology.

#### Unplanned events

1. Notify your [regional Hazardous Waste and Toxics Reduction \(HWTR\) office](#)<sup>6</sup> within 72 hours of the event via email or fax.
2. Submit your forms within 30 days of the event.

### Episodic management standards

#### Treatment and disposal

Send episodic waste to a designated facility within 60 calendar days from the start date of the event.

- MQGs have the option to [treat episodic waste on site](#)<sup>7</sup> however treatment must be done within 60 calendar days from the start date of the event.
- SQGs must send their waste to a designated facility. If you are a SQG, you **can't**:
  - Treat your episodic waste.
  - Send your episodic waste to a large quantity generator under the control of the same person or company under the SQG consolidation rules.

#### Accumulation

You can only accumulate the waste in tanks and containers—no other type of waste accumulation is allowed, including drip pads or containment buildings. Tanks and containers must be in good condition and compatible with the dangerous waste. Containers must also be kept closed except when adding or removing waste.

If you are accumulating episodic dangerous waste, read [WAC 173-303-173](#)<sup>8</sup> for a full list of requirements or contact your regional office for technical assistance.

<sup>6</sup> <https://ecology.wa.gov/About-us/Get-to-know-us/Contact-us>

<sup>7</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Dispose-recycle-or-treat/Treatment-by-generator>

<sup>8</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-173>

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### Labeling

Make sure your tanks and containers are clearly marked or labeled:

- As “Episodic Dangerous Waste” or “Episodic Hazardous Waste.”
- With the hazards associated with the waste (ignitable, corrosive, reactive, and/or toxic).
- With the date the episodic event began.

With the exception of the accumulation start date, labels must be legible from 25 feet or the lettering size at least one-half inch in height. For containers one gallon (or four liters) and under, the label, marking, or lettering can be appropriate for the size of the container.

### Recordkeeping

Keep the following records on site for a minimum of five years following an episodic event:

- Actual beginning and end dates of the event
- Description of the episodic event
- Description of the types and quantities of dangerous wastes generated during the event
- How the dangerous waste was managed and the name of the designated waste facility
- Name(s) of dangerous waste transporters
- Manifests
- Dangerous Waste Annual Report
- If petitioned as a second event, a copy of the approval letter from Ecology

### How many episodic events can I have?

You are allowed to have one episodic event per calendar year (January 1 – December 31) but may petition for a second event.

### Petitioning for a second event

Your second event must be the opposite type as your first. For example, if your first event was “planned” then you may only petition for an “unplanned” event in the same year.

To petition for a second event, complete a [Second Event Petition Form](https://fortress.wa.gov/ecy/publications/summarypages/ecy070611.html)<sup>9</sup> or contact your [regional office](https://ecology.wa.gov/contact.html)<sup>10</sup> for technical assistance.

<sup>9</sup> <https://fortress.wa.gov/ecy/publications/summarypages/ecy070611.html>

<sup>10</sup> <https://ecology.wa.gov/contact.html>