



EPISODIC GENERATION in NEVADA: UNPLANNED EVENT CHECKLIST

Within 72 hours of the generation event

- Follow all emergency preparedness and preparation plans if the unplanned event is a spill and/or an event that has potential to impact human health and the environment
- What type of wastes do you have? Know the waste codes and general quantities for notification
- Notify NDEP WITHIN 72 HOURS** of the generation event by calling or emailing Mandy Hood, 775.687.9464, mhood@ndep.nv.gov.
- Immediately follow up your notification using form 8700-12 with the Addendum to the Site Identification Form: Episodic Generation through [RCRA Info](#) or via mailed in paper copy to Nevada Division of Environmental Protection, Bureau of Sustainable Materials Management, Attn: Notification Program, 901 South Stewart Street, Suite 4001, Carson City, Nevada 89701-5249
- Confirm the unplanned generation event has been approved by NDEP
- Confirm EPA ID Number was obtained from notification via form 8700-12

Prepare for the episodic generation event

- Obtain compatible container or tank systems for the hazardous waste
- Obtain labels for containers
- Secure and/or contract with a hazardous waste hauler to pick up wastes within the 60-day window. Ensure your hauler will deliver to a RCRA-designated facility
- If an SQG, prepare to follow all conditions in §262.16 for wastes managed including preparedness and prevention plans and employee training.
- If a VSQG, ensure all hazardous waste will be managed in a manner that minimizes the possibility of fire, explosion, or release of hazardous waste or hazardous constituents to the air, soil, or water
- Ensure all staff involved with episodic generation understands the conditions of the e

During the episodic generation 60-day window

- Accumulate generated waste in containers or tanks labeled with the words “Episodic Hazardous Waste”, an indication of the hazards of the contents such as an OSHA pictogram or DOT label, and the start date of the event
- Keep all containers closed unless adding or removing wastes. Do not leave funnels in tanks when not adding waste.
- For VSQGs, ensure containers and tanks are in good condition, compatible with wastes, and have tank overflow prevention in place. For SQGs, ensure tank and container compliance with §262.16(b)(2) and §262.16(b)(3)
- Make sure hazardous waste is manifested to an off-site RCRA permitted facility by the end date of the episodic generation event. SQGs can treat hazardous waste generated within the 60-day window.

After the episodic generation event

- Keep all records of the event for 3 years from the end date of the event. (§262.232 including:
 - Beginning and end date of the episodic event
 - A description of the episodic event
 - Types and quantities of hazardous waste generated during the event
 - A description of how the hazardous waste was managed and the name of the facility that accepted the waste
 - The name of the hazardous waste transporter
 - NDEP approval of the episodic generation event

Free and Confidential Assistance for Nevada's Businesses and Communities
BEP Toll-Free Assistance (800) 882-3233 | www.unrbep.org

DISCLAIMER: This guidance document is intended as general information and is not provided nor intended to act as a substitute for legal advice or other professional services. BEP advises the regulated community to read all applicable regulations set forth in both US Code of Federal Regulations (Title 40 C.F.R. Parts 260-279) and the Nevada Hazardous Waste Regulations and to keep informed of all subsequent revisions or amendments to these regulations. This guidance document was developed by BEP with funding support provided by the Nevada Division of Environmental Protection.

