



## Short Term Generators (One-Time Generator)

**As of October 1, 2019, "Provisional ID Numbers" (starting with the prefix "NCP") will no longer be issued by the North Carolina Hazardous Waste Section.**

EPA Identification (ID) Numbers will now be issued for sites operating as "Short Term Generators."

### **What is a Short Term Generator?**

A "short term" generator is any site generating hazardous waste only as the result of a one-time, non-recurring, temporary event that is not related to normal production processes. The site is normally not a generator of hazardous waste. In other words, short-term generators produce hazardous waste from a particular activity for a limited time and then cease conducting that activity. The short term generator notification is used:

- For sites that do not already have an EPA ID number assigned and
- For one-time generation of hazardous waste
- This can be used for emergencies (e.g. unknown drums on property that does already not have an EPA ID number)
- This is not used for sites that normally generate HW (even very small amounts)
- This type of generator is considered a "Short Term Generator"

Short-term generators are not considered episodic generators because episodic generators (i.e., VSQGs and SQGs) regularly generate hazardous waste as part of their operations but elevate to a higher generator category as a result of a planned or unplanned event (see [Episodic Generation Guidance](#)).

Examples of short-term generators that also meet the above criteria include (but are not limited to):

- One-time highway bridge waste generation;
- Underground storage tank removals;
- Generation of off-specification or out-of-date chemicals at a site that normally doesn't generate hazardous waste;
- Remediation or spill clean-up at sites with no previous RCRA EPA Identification Number; and
- Site or production process decommissions.

### **Is there a fee associated with operating as a Short Term Generator?**

The same fees (N.C.G.S. 130A-294.1) apply to Short Term Generators that apply to permanent generators of hazardous waste. The fees are based on the amount of hazardous waste generated.

- 220 lbs. up to 2,200 lbs.: \$175
- 2,200 lbs. or more: \$1,400

The Short Term Generator number will not be issued until the fee has been paid.

## **How do I apply for a Short Term Generator ID Number?**

To notify as a Short Term Generator, a facility must first register on EPA's RCRAInfo database at this link: <https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>

A tutorial for registering and requesting an EPA ID number in RCRAInfo can be found at this link: <https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/8700-guidelines/Electronic-Filing-of-EPA-Notifications.pdf>

When notifying as a Short Term Generator, the site should mark "Y" for "Short Term Generator" (on Section 10.A.2 of the electronic EPA 8700-12 form). When "Y" is marked for Section 10.A.2, you must provide an explanation of your short-term generation event in the Comments Section (and in Section 18 Comments).

The screenshot shows a web form titled "10. Type of Federal Regulated Waste Activity" with a "Turn Off All Activities" link in the top right. The form is divided into "A. Hazardous Waste Activities" and contains several sections:

- 1. Generator of Hazardous Waste (Federal) \***: A dropdown menu with "1 - Large Quantity Generator" selected.
- Generator of Hazardous Waste (State) \***: A dropdown menu with "F - Same as Federal" selected.
- 2. Short Term Generator**: A "Yes" button is highlighted with a red arrow.
- 3. Treater, Storer, or Disposer of Haz Waste**: A "No" button.
- 4. Receives Hazardous Waste from Off-site**: A "No" button.
- 5. Recycler of Hazardous Waste**: A dropdown menu with "Select Recycler Activity" selected.
- 6. Exempt Boiler and / or Industrial Furnace**: A dropdown menu with "None selected" selected.
- Short Term Generator Comments \***: A text area with a red arrow pointing to it.

## **What requirements are applicable to Short Term Generators?**

Short Term Generators are subject to the same regulations as permanent hazardous waste generators. The requirements for hazardous waste generators can be found in North Carolina's Hazardous Waste Management Rules (15A NCAC 13A). Failure to comply with these regulations may result in enforcement actions. The following Hazardous Waste Section website provides links to state hazardous waste rules and law: <https://deq.nc.gov/about/divisions/waste-management/hw/rules>

A Short Term Generator must determine the hazardous waste category and comply with the applicable requirements for the hazardous waste generator category at which they operate (even if for a short period of time) [40 CFR 262.13, adopted by reference at 15A NCAC 13A .0107(a)].

## **What is Short Term ID number used for?**

The ID number that is issued to Short Term Generators is used to track the hazardous wastes activity and hazardous waste generated at the site. The Short Term ID number is meant for one-time use and automatically "expires" after 90 days. After 90 days, the ID number will be deactivated by the Hazardous Waste Section and the site will be considered "not a generator" or NAG.

**Who do I contact if I have questions about Short Term Generator Notification?**

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If you have questions about registering in RCRAInfo, please contact:

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