



# Connecticut's Policies on:

- Generator Status Determination/Episodic Generation
- Generator Closure

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# Generator Status Determination

- ✱ CT's regulations set the SQG/LQG Status threshold at 1000 kg (total on-site accumulation).
- ✱ CESQGs not allowed to dispose of hazardous waste in the trash.
- ✱ Monthly generation rates same as EPA.

# Episodic Generation

- ★ Follow guidance in 1986 SQG Federal Register Notice (51 FR 10153-10154).
- ★ Episodic Generators are subject to regulation under higher status during the time they store the excess material.
- ★ Are required to have all applicable compliance documents, etc.
- ★ Not required to notify and obtain a permanent ID # (Temp. ID # instead).

# Episodic Generation (Cont.)

- ★ No written policy, but provide practical advice on how to comply with contingency plan, personnel training, and inspection requirements.
- ★ Episodic LQGs: Biennial Report technically a requirement, but forms are not mailed out as with full-time LQGs.
- ★ Episodic vs. non-episodic: “once per year” rule of thumb.
- ★ Anticipated/expected vs. random/non-recurring generation events.

# Episodic Generation (Cont.)

## ★ Manifest Database Initiative

- ★ Designed to detect generators operating out of status.
- ★ Candidates gleaned from our electronic manifest database.
- ★ Did >80 Inspections since 2002, many of which resulted in enforcement actions.
- ★ Big problem: Temp ID #s.
  - ★ Using them for > allowed timeframes.
  - ★ Using multiple temp ID #s.
  - ★ “Off of our radar screen.”

# Generator Closure

- ★ CT's regulations require generator closure for LQGs AND SQGs.
- ★ Both are subject to:
  - ★ 265.111 (closure performance standard)
  - ★ 264.113(a)-(c) (180-day closure time limit).
  - ★ 265.114 (disposal of cleanup wastes).
- ★ Have generator closure guidance.
- ★ Cleanup standards: State RSRs.
- ★ Big Q: How to deal with generators that stored > 90 days? (Att. A of Guidance)