



IDEM Regulatory Update

Environmental Stewardship Program

Annual Meeting

December 3, 2020





Angela Taylor

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CTAP Small Business Regulatory Coordinator / Liaison
IDEM Office of Program Support
Pollution Prevention and Compliance Assistance Section
Compliance and Technical Assistance Program (CTAP)



IDEM's Compliance and Technical Assistance Program



Compliance and Technical
Assistance Program

Indiana Department of Environmental Management

Helping Indiana businesses one step at a time

Visit idem.IN.gov/ctap for more information



CTAP Staff

1

Northwest Regional Office:

- Charles Breitenfeldt, (219) 250-0119

2

Northern Regional Office:

- Joseph Neuklis, (574) 245-4879

3

Indianapolis Central Office:

HOTLINE (800) 988-7901 or (317) 232-8172

- Tracy Barnes
- Hani Sharaya
- Mark Stoddard
- Chrystal Wagner

CTAP Small Business Regulatory Coordinator:

- Angela Taylor, (317) 233-0572

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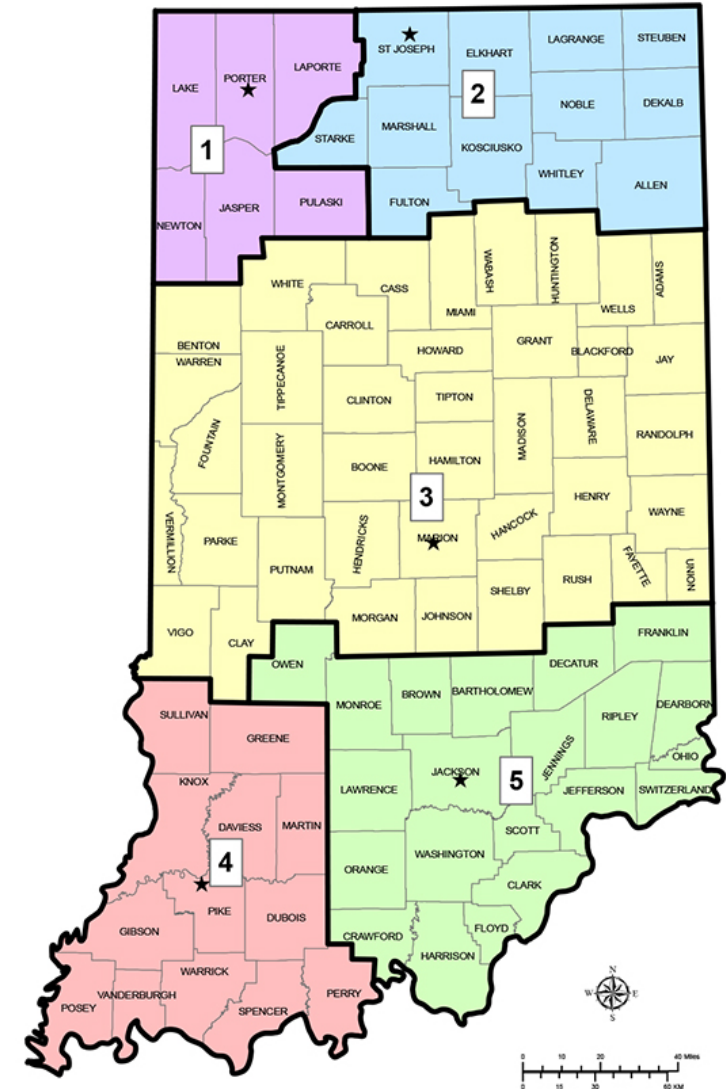
Southwest Regional Office:

- Heath Dill, (812) 380-2303

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Southeast Regional Office:

- Andrew Dryden, (812) 919-2145



Website: www.idem.IN.gov/ctap



What's Been Going on at IDEM?

IDEM COVID-19 ACTIONS

- Staff are predominately working remotely but IDEM has not relaxed any policies nor has the agency issued any broad-based waivers from meeting stringent regulatory requirements.
- [Subscribe to IDEM COVID19 Actions Updates](#) for the [latest information](#) related to: Office Visitation Restrictions, Compliance Inspections, Electronic Submittals to the Agency, Public Notice Practices, Enforcement Discretion, Extension of Submission Deadlines, and Specific Regulation Waivers

NOTABLE STAFFING CHANGES - Retirements / Farewells

- Keith Baugues, OAQ Assistant Commissioner
- Bruce Oertel, OLQ Remediation Branch Chief
- Rebecca Joniskan, OLQ Permits Branch Chief

UPGRADES TO IDEM RESOURCES AND E-SERVICES

- Many existing platforms and services have been upgraded, updated, and linked
- New webpages and additional E-services available



Upgrades to IDEM's Electronic Resources

<https://portal.idem.in.gov/>



<https://in.gov/idem/5674.htm>



- CTAP web Portal
- Maps and Geographic Information System (GIS) Applications
- Excess Liability Trust Fund (ELTF) Claim Status Search
- Permit and Authorization Status Search
- Online Complaint Form
- Virtual File Cabinet (VFC)
- IDEM Public Website
- Regulatory Services Portal (RSP)
- Asbestos License Renewal Web Tutorial
- DieselWise Indiana Portal
- LEADS
- NetDMR
- IDEM Regulatory ePortal



New CTAP Online Portal

IDEM has launched a new Compliance and Technical Assistance Program online portal through Access Indiana. This new portal is a secure online system that makes it easier for businesses and organizations to request confidential assistance regarding environmental regulations, compliance, and permitting.

In the new CTAP portal, businesses, companies, organizations, and individuals can:
























- Create a secure account and submit confidential requests directly
- Request confidential site assessments for your business or specific equipment/processes
- Communicate and track interactions with CTAP staff
- Invite collaborators within the company or designated consultants to access and view the CTAP request and recommendations
- Provide feedback to the CTAP team through surveys



To submit a confidential request using the new CTAP portal, visit portal.idem.IN.gov



Available Services

 Indiana Unclaimed Property <i>Attorney General</i>	 Quick Quote <i>Bureau of Motor Vehicles</i>	 BMV Online Scheduler <i>Bureau of Motor Vehicles</i>	 Indiana Public Safety Portal <i>Department of Homeland Security</i>	 IURC Online Services Portal <i>Utility Regulatory Commission</i>	 Search for a License <i>Professional Licensing Agency</i>
 Travel Advisory <i>Department of Homeland Security</i>	 Campground Reservations <i>Department of Natural Resources</i>	 Ginseng Indiana <i>Department of Natural Resources</i>	 Fish & Wildlife <i>Department of Natural Resources</i>	 Make a First Steps Payment <i>Family and Social Services Administration</i>	 IDEM Compliance and Technical Assistance Program (CTAP) <i>Indiana Department of Environmental Management</i>
 Check Refund Status <i>Department of Revenue</i>	 DORpay <i>Department of Revenue</i>	 INTaxpay <i>Department of Revenue</i>	 Job Seeker Portal <i>Department of Workforce Development</i>	 Birth and Death Records <i>Indiana Department of Health</i>	 DRIVE <i>Indiana Department of Health</i>
 Child Care Finder <i>Family and Social Services Administration</i>	 INconnect Alliance <i>Family and Social Services Administration</i>	 IN Connect <i>Family and Social Services Administration</i>	 Indiana Addiction Treatment <i>Family and Social Services Administration</i>	 Register to Vote <i>Secretary of State</i>	

Check the Available Services to see a list of all online services utilizing the Access Indiana login.
(<https://www.in.gov/access/available-services.html>)



A SINGLE LOGIN & PASSWORD FOR YOUR INDIANA SERVICES



New CTAP Online Portal



Compliance and Technical
Assistance Program

Indiana Department of Environmental Management



By entering information into this portal, you are requesting confidential regulatory and technical assistance from the IDEM Compliance and Technical Assistance Program as indicated in Indiana Code 13-28. It is understood that such assistance will be held in confidence as required by Indiana Code 13-28-3-4.

The CTAP Portal is not to be used for filing complaints. Please call the IDEM Complaint Coordinator at 800-451-6027 Option 3 or submit [online](#).

The CTAP Portal is not to be used to report an environmental emergency. Call IDEM's 24-Hour Emergency Spill Line toll free at (888) 233-7745 or (317) 233-7745.

Please visit [About CTAP](#) to view the user guide and portal demonstration video.

❗ Please sign in to open a new case or to view a list of your existing cases.



Permit and Authorization Status Search

IDEMdata
MAPS • APPS • REPORTS

Search for Authorization Status

At this time, the following authorization types can be found:

- Air Permits, Registrations, and Letters of Exemptions
- Alternative Fuel Processor Registrations, Closures, and Revocations
- Biomass Digester Registrations, Closures, and Revocations
- CFO/CAFO Applications, Permits, and Terminations
- Composting Registrations, Closures, and Revocations
- E-Waste Storage & Processing Applications, Registrations, Renewals, and Closures
- Hazardous Waste Applications, Permits, and Closures
- Mobile Home Demolition Registrations, Closures, and Revocations
- NPDES Construction Storm Water Permits
- NPDES Industrial Storm Water Permits, Applications, Terminations and Exclusions
- Solid Waste Land Disposal Applications, Permits, and Closures
- Solid Waste Excluded Activity Decisions
- Solid Waste Processing Facility Applications, Permits, and Closures
- Waste Tire Registrations, Closures, and Revocations



Permit and Authorization
Status Search

Search by Facility

Search by Authorization



Regulatory Services Portal (RSP)

The RSP, part of the myIDEM on-line experience, was recently upgraded

What is RSP?

- A secure Web services portal that allows IDEM customers to submit data as required by law, permit or regulatory requirement.
- The functionality of these services can range from permit application submission to online certification programs.
- IDEM will be frequently updating the site to add additional features and services to allow more submissions for various agency requirements.



What services are available?

RSP currently has two services available:

- Industrial Storm Water Discharges (Requires Creating An Indiana Electronic Subscriber's Agreement (IESA))
- Underground Storage Tank Operator Training (No IESA Required)

Regulatory Services Portal



e-Services

IDEM E-Services

- [Asbestos License Renewal Web Tutorial](#): Video tutorial training series that guides users through the license renewal process for Individuals and Contractors

**Asbestos License
Online Renewal Training**

This is a training video that shows how to complete an online renewal application for an individual or contractor asbestos license.

This video presentation features a step by step description to make the online renewal process easier.

Asbestos Training Videos

- [Individual License Renewal](#)
- [Contractor License Renewal](#)

Indiana
Online Licensing

Welcome to MyLicense Online License/Permit Services

RENEWALS AND ADDRESS CHANGES: To renew your existing license or permit, login below. You can also change your address and contact info anytime by logging in below.

PURCHASE PLA LICENSE: If your license is regulated by the Indiana Professional Licensing Agency (PLA) - you can purchase a hard copy of your license/permit online. You must login below - see login ID/password info.

LOGIN ID: Enter your ENTIRE PRIMARY License # including all letters (front or back) and numbers (example: 12000000A for dentists or BC00000001 cosmo or XT000333 rad techs) in the box provided. **If you have licenses in more than one profession (example nursing & real estate) - your User ID could be the primary in either profession - you might have to try both.**

PASSWORD INFO (read carefully):

- **PLA - INDIVIDUALS** - SSN without dashes is your password.
- **ISDH - NURSE AIDES & X-RAY OPERATORS** - SSN without dashes is your password.
- **IDEM - WATER OPERATORS** - Login ID & Password are on the Renewal Notice mailed in May of 2010.
- **IGC - ATHLETIC COMMISSION** - The same license number as your Login ID is also your Password.
- **PLA - SALONS/FACILITIES/COMPANIES/CORPORATIONS/BUSINESS** - Enter your License # again for password.

Login ID:

Password:

Login

ADOBE CAPTIVATE™



e-Services

IDEM E-Services

- [DieselWise Indiana Portal](#): Designed to provide available funding information and the electronic submittal of applications, fleet inventories, and reimbursement requests
- [LEADS](#): Provides access to near real-time data from Indiana's continuous air quality monitoring network and semiannual non-continuous monitor data. Approximately 90 percent of Indiana's air monitoring network is now available via this system.



IDEM Air Monitoring

Air Quality Maps

Data Reports and Graphs

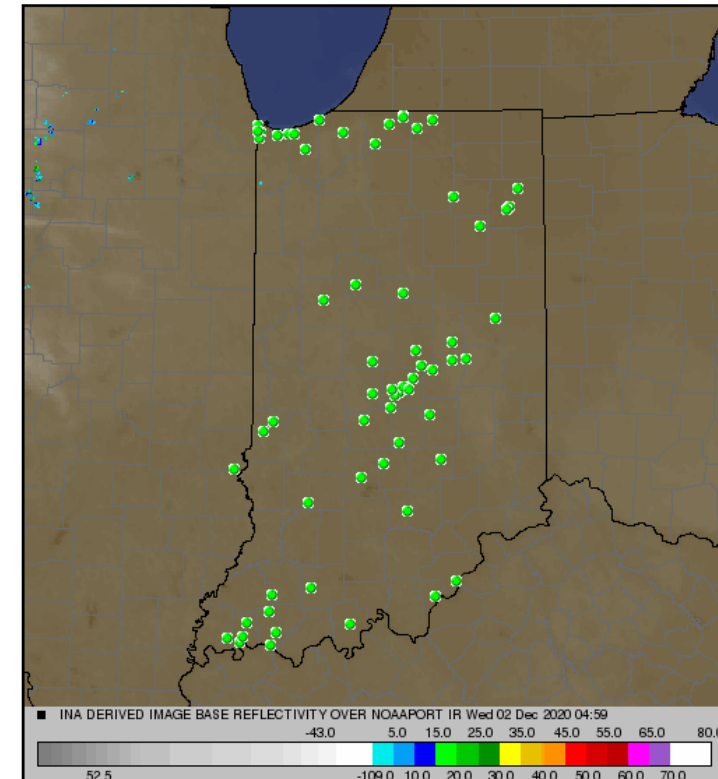
Noncontinuous Data

AutoGC

General Infor

Continuous Air Quality Monitoring

Welcome to IDEM's air monitoring network site. IDEM is in the process of linking all our air monitoring sites into the one easy-to-use site.





e-Services

IDEM E-Services

- [NetDMR](#): Is a free web-based tool that allows National Pollutant Discharge Elimination System (NPDES) permittees to electronically sign and submit their discharge monitoring reports (DMRs) to IDEM



- [IDEM Regulatory ePortal](#): Permitting, Compliance Management, and public data search tool for the IDEM Stormwater Construction Activity (NPDES) program (Rule 5). Apply for permits, Manage permits (pay fees, apply for renewals) and Submit required reports

IDEM Indiana Department of Environmental Management

Regulatory ePortal

Permitting, Compliance Management, and public data search tools for the IDEM Stormwater Construction (NPDES) program

[About](#) [Contact](#)



Sign In



Permitting & Compliance

What can I do here?

- Apply for permits
- Manage your permits (pay fees, apply for renewals)
- Submit reports (required by your permit or certification)

To get started, you'll need an account.

[CREATE AN EPORTAL ACCOUNT](#)

[Sign in with an existing account](#)

Public Services

These services are provided to be freely used by the public; no account is necessary to make use of them.



Site Map Explorer

Use our Explorer mapping tools and advanced-search capabilities to navigate all public information on Construction Stormwater permitting.





IDEM New Spill Response Webpages

To help expedite the containment and cleanup of spills, IDEM has developed two new webpages:

[Selecting a Spill Contractor](#) and the [Spill Contractor Map](#)

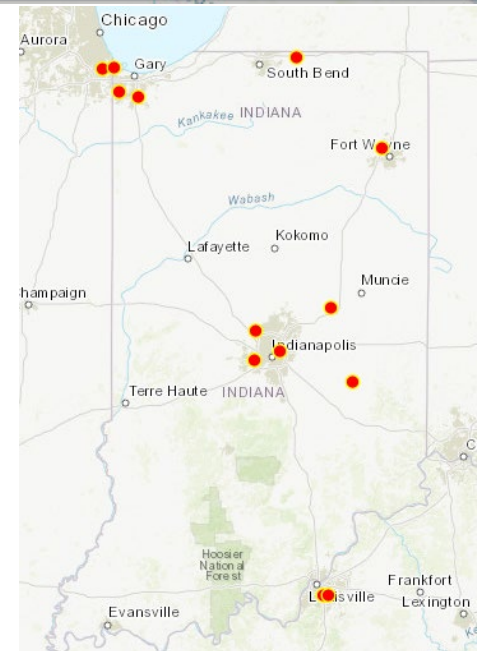
Find a Spill Contractor - Selecting an environmental spill contractor is different than selecting an environmental consultant

You've had a spill and need to select a spill contractor
- Important considerations when contacting prospective spill contractors

Pre-planning - All businesses with the potential to release petroleum, hazardous or objectionable substances are encouraged by IDEM to pre-plan and develop a spill contingency plan for environmental related emergencies (even if there is no applicable regulatory requirement)

Additional Resources - Provided to assist with the identification of other reporting obligations

Spill Response Contractor Location Map



This map includes contractors who indicate that they maintain 24-hour spill response capabilities using in-house personnel and equipment to respond to emergency spills within Indiana.



E101 Training Event

Environmental Management



Are You Ready? Spill prevention, Preparedness and Spill Waste Disposal

On November 19, 2020, IDEM staff from the Emergency Response Section (ERS) and Compliance and Technical Assistance Program (CTAP) joined in a 2-hour Zoom Webinar.

ERS On-Scene Coordinators offered information and practical advice on:

- Spill Response Planning, Notifications and Reporting
- Contractor Selection

CTAP staff discussed spill waste management including:

- Solid and Hazardous Waste Determinations
- Proper Disposal of Various Spill Related Wastes

Joint Q&A Session

Recording available soon on the [Environmental Education for Regulated Entities \(E101\)](#) webpage



pportunities

The U.S. Environmental Protection Agency (EPA) has partnered with IDEM and Purdue Manufacturing Extension Partnership (MEP) to offer technical assistance and grant opportunities to Indiana manufacturers.



Available Awards

- 15 Indiana manufacturers can receive W.A.S.T.E. Stream Mapping assessments conducted by Purdue MEP at a significantly reduced cost
- Participating facilities may receive up to 40 hours of follow up technical assistance through Purdue's Faculty Assistance Program
- Participating facilities may apply for seed grant money from IDEM for project implementation



ppportunity Details

Eligibility: Manufacturing facilities located in Indiana

Services Offered: Purdue MEP will conduct an on-site (or virtual if preferred) W.A.S.T.E. (water, air, solids, toxics, energy) assessment to identify opportunities to reduce usage, pollutants, and waste. Purdue MEP will also:

- Prepare a report and presentation with recommendations to your facility staff;
- Compile a custom action plan for your facility;
- Check-in to collect data on project status and results;
- Customize a final report showing waste and emissions reductions, cost savings, expense reductions (e.g., Permitting, fees, labor, disposal costs), and performance improvements - potential \$10,000-200,000 value, based on previous results. *(Results will vary based on specific projects).*

Cost: \$1,500 in company matching funds. The U.S. EPA is funding the remainder of the cost (approximately \$6,000 per facility).

Seed Grants: Participating facilities may apply for funding from IDEM to implement suggestions from Purdue MEP. The average grant amount will be approximately \$4,500. IDEM anticipates awarding 6 to 10 grants total.

Technical Assistance: Up to 40 hours of assistance may be provided to businesses to help identify specific solutions to unique issues. Assistance includes Purdue's Faculty Assistance Program, which pairs companies with unique and challenging unresolved projects with specialized University experts who can assist in resolving those niche issues.



ppportunity Details

Apply Today!

Complete the [online application](#). The business will be contacted by a representative from Purdue MEP to discuss whether the facility is a good fit for the program.

Additional Information

[IDEM Pollution Prevention \(P2\) Grants](#)
[Purdue MEP](#)

Questions about this program?

Contact:



Kelly Weger

Lead Service Manager Sustainability

Office Phone: 317-275-6810

Mobile Phone: 734-320-5908

Email: weger@purdue.edu



Resources for Rule, Policy, and Notices



- IDEM [Public Notices](#) site provides public access to all notices as required by statute for all of Indiana (can sign up for automatic notifications).
- The [IN.gov News and Events Calendar](#) provides information on public meetings that do not require public notice.
- Indiana General Assembly – [Indiana Register](#) documents for all agency public noticed content.
- Rules in Progress – IDEM's Office of Legal Council provides details about IDEM [Rulemakings](#) currently underway and archives of past rulemaking activities.
- [Environmental Rules Board](#) website for meeting calendar, agendas, summaries, transcripts and board packets.
- CTAP [Regulatory Updates](#) provide monthly summaries of public noticed content and Environmental Rules Board meeting activities (if applicable).
- Partners for Pollution Prevention [Partner Events](#) hosts the quarterly meeting presentations, and ESP [Annual Meetings](#), both of which include CTAP's tailored regulatory updates for these groups.
- CTAP maintains a list of [compliance due dates](#) for Indiana businesses, including all media / regulatory program areas of IDEM (land, air, water).



Environmental Rules Board



Tentative Date and Location of Next Meeting
February 10, 2021, 1:30 PM (EST), virtually through **zoom**



The public may join the Environmental Rules Board (ERB) meeting by using the following:

Zoom link: <https://zoom.us/j/93846345845?pwd=eklqWHVKRk1LU1hGMVVzaStldDVxZz09>

By phone: 312-626-6799 or 929-205-6099

Meeting ID: 938 4634 5845

Passcode: 963768



Environmental Rules Board - Rulemakings

November 18, 2020 Meeting Summary

Emergency Rule

- Vigo County SO₂ Redesignation and Lake and Porter Ozone Reclassification Emergency Rule. (OAQ)
- Marion County SO₂ Redesignation Emergency Rule. (OAQ)

Adoption

- Marion County SO₂ and Muncie Lead Redesignations LSA #20-473. (OAQ)*
- ArcelorMittal and NIPSCO SO₂ Revisions LSA #20-449. (OAQ)*

Preliminary Adoption

- Vertellus PM Revisions LSA #19-82. (OAQ)
- Hazardous Waste Financial Assurance LSA #14-287. (OLQ)
- NO_x Emissions Monitoring. LSA #19-589 (OAQ)
- Metals Criteria. LSA #14-58 (OWQ)

Final Adoption

- Cold Cleaner Degreasing Alternative LSA #18-542. (OAQ) *
- Pharmaceuticals and Other Hazardous Waste Updates. LSA #20-204. (OLQ)*
- Air Permit Fee Updates LSA #20-21. (OAQ)*

February 10, 2021

Tentative date and agenda items

Emergency Rule

- Marion County SO₂ Redesignation Emergency Rule (OAQ)

Final Adoption

- Vertellus PM Revisions. LSA #19-82. (OAQ)
- Hazardous Waste Financial Assurance LSA #14-287. (OLQ)
- NO_x Emissions Monitoring LSA #19-589. (OAQ)

*** = Effective March 2021**



Hazardous Waste Regulation Topics / Updates

IDEM completed the rulemaking for amendments to 329 IAC 3.1 concerning updates to the Hazardous Waste Requirements (LSA #18-48) and the rulemaking was effective as of 12/26/2019. (Final Rule [DIN: 20191225-IR-329180481FRA](#))



NOTABLE PROCESS CHANGES

- IDEM has transitioned to electronic reporting & notifications through U.S. EPA's [RCRAinfo](#) portal for hazardous waste. The previous methods of paper (Handler ID) forms and 3rd party electronic reporting (Easitrak) are no longer being used.
- A facility representative must register for [myRCRAid](#) through the Central Data Exchange (CDX) before completing an initial notification or updating an existing U.S. EPA ID number.
- IDEM now requires both LQGs and SQGs to use the **Form GM** for reporting in odd and even numbered reporting years via the **Biennial Report Application** in RCRAinfo. (LQG's are subject to all applicable regulations under Subtitle C of RCRA and must submit the Biennial Report, annual reports, and annual Generator fees (under IC 13-22-12-3). SQG's must submit an annual report summarizing hazardous waste shipments for each year (per IC 13-22-4-3.1). SQGs are not subject to Generator fees.)
- The [annual operation fee](#) is now assessed by **June 1** and due within 30 days of the invoice date (**July 1**) for facilities that dispose, incinerate, store, treat, generate HW (**LQG only**), manage post closure activity, and/or manage groundwater compliance sampling.



HW Reporting Summary

Who Must File and Which Report Must be Submitted?

Facility Type	Report Type	Report Year	Date Due	Forms Required	Report Required
Small Quantity Generators at least one month of the year	Annual Manifest	Every Year	March 1	SI, GM, OI	Biennial Report via RCRAinfo
Very Small Quantity Generators (VSQG) that for any one calendar month generate more than 220 pounds or accumulate on-site at any time more than 2,200 pounds of hazardous waste	Annual Manifest	Every Year	March 1	SI, GM, OI	Biennial Report via RCRAinfo
Large Quantity Generators at least one month of the year	Biennial Hazardous Waste or Annual Manifest	Every Year	March 1	SI, GM, OI	Biennial Report via RCRAinfo
Treatment, Storage, Disposal Facilities	Biennial Hazardous Waste or Annual Manifest	Every Year	March 1	SI, GM, WR, OI	Biennial Report via RCRAinfo

If Your Facility is not an LQG, SQG, OR TSD

- If your facility was not an LQG, SQG, or TSD facility in any month of the year no report is required.
- However, if you received a reporting reminder from IDEM, you **MUST** register and complete a subsequent notification in myRCRAid to update your generator status appropriately. This is necessary to verify that you were not an LQG or SQG during the report year and do not owe a report. Even if the business is no longer active the entire report is still required if the facility acted as an SQG or LQG in any one month during the report year.



HW Generator Categories - Review

Requirement	VSQG	SQG	LQG
Quantity Limits - The amount of hazardous waste (HW) generated per month (kg / month) §260.10	≤100 non- acute HW	>100 and <1,000 non-acute HW	≥1,000 non-acute HW
	≤1 acute HW	≤1 acute HW	>1 acute HW
	≤100 acute spill residue or soil	≤100 acute spill residue or soil	>100 acute spill residue or soil
EPA ID Number - identifies generators by site.	Not required	Required §262.18	Required §262.18
On-Site Accumulation Quantity - Amount of HW generators are allowed to "accumulate" on site without a permit.	≤1 kg acute HW	≤6,000 kg §262.16(b)(1)	No limit
	≤1,000 kg non-acute HW		
	≤100 kg of acute spill residue or soil §262.14(a)(3) & (4)		

Requirement	VSQG	SQG	LQG
Accumulation Time Limits - Allowable amount of time HW is allowed to accumulate on site.	None	≤180 days or ≤270 days (if transporting greater than 200 miles) §§262.16(b)-(d)	≤90 days §262.17(a)
Accumulation Requirements- Manage HW in compliance with certain technical standards.	None	Basic requirements with technical standards for containers, tanks, drip pads or containment buildings §§262.16(b)(2)-(5)	Full compliance for management of containers, tanks, drip pads or containment buildings §§262.17(a)(1)-(4)
Personnel Training	Not required	Basic training required §262.16(b)(9)(iii)	Required §262.17(a)(7)
Contingency Plan and Emergency Procedures.	Not required	Basic planning required §§262.16(b)(9)	Full plan required Part 262 subpart M (from §262.17(a)(6))
Preparedness and Prevention	Not required	Required §262.16(b)(8)-(9)	Required Part 262 subpart M

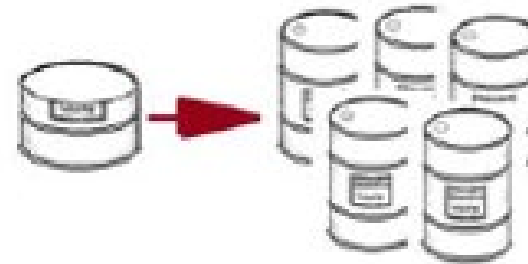
HW Generator Categories - Review

Very Small Quantity Generator (VSQG)



½ Drum or
27 Gal. or
220 lbs. or
100 Kg

Small Quantity Generator (SQG)

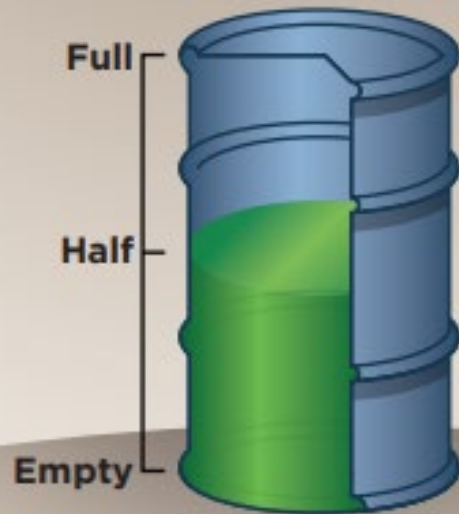


½ to 5 Drums or
27-275 Gal. or
220-2200 lbs. or
100-1000 Kg.

Large Quantity Generator (LQG)



>5 Drums or
>275 Gal. or
>2200 lbs. or
>1000 Kg.



For a typical liquid hazardous waste, 100 kg (220 lbs) equals about half of a 55-gallon drum.

RCRA - Alternative Standards for Episodic Generation

Provisions in [Part 262, Subpart L](#) allow VSQGs and SQGs to maintain their existing generator category in the event of an episodic generation event (i.e., generators do not have to count hazardous waste managed as part of the episodic event when making their monthly generator-category determination).

Episodic event - activities, either planned or unplanned, that do not “normally” occur during generator operations, resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category (VSQG or SQG).



Planned episodic event - episodic event that the generator planned and prepared for, including regular maintenance, tank cleanouts, short-term projects, and removal of excess chemical inventory.

Unplanned episodic event - episodic event that the generator did not reasonably expect or plan to occur, including production process upsets, product recalls, accidental spills, or “acts of nature,” such as tornado, hurricane, or flood





Alternative Standards for Episodic Generation

APPLICABILITY

- VSQGs and SQGs are eligible for the Subpart L Exclusion, provided that all the conditions in 40 CFR 262.232 are met.
- Large quantity generators (LQGs) are **not** eligible for the Subpart L Exclusion.

NOTIFICATION

- Planned Episodic Event - the VSQG or SQG must use *EPA Form 8700-12* to notify IDEM a minimum of 30 calendar days prior to initiating activities.
- Unplanned Episodic Event - the generator must notify IDEM within 72 hours of the unplanned event via phone, email, or fax with follow-up submittal of *EPA Form 8700-12* to IDEM within 7 calendar days.
- The required notification shall include:
 - Start and end dates of the episodic event
 - Reason(s) for the event
 - Types and estimated quantities of hazardous waste expected to be generated
 - Identify a facility contact / emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to an emergency
 - Facility EPA ID number



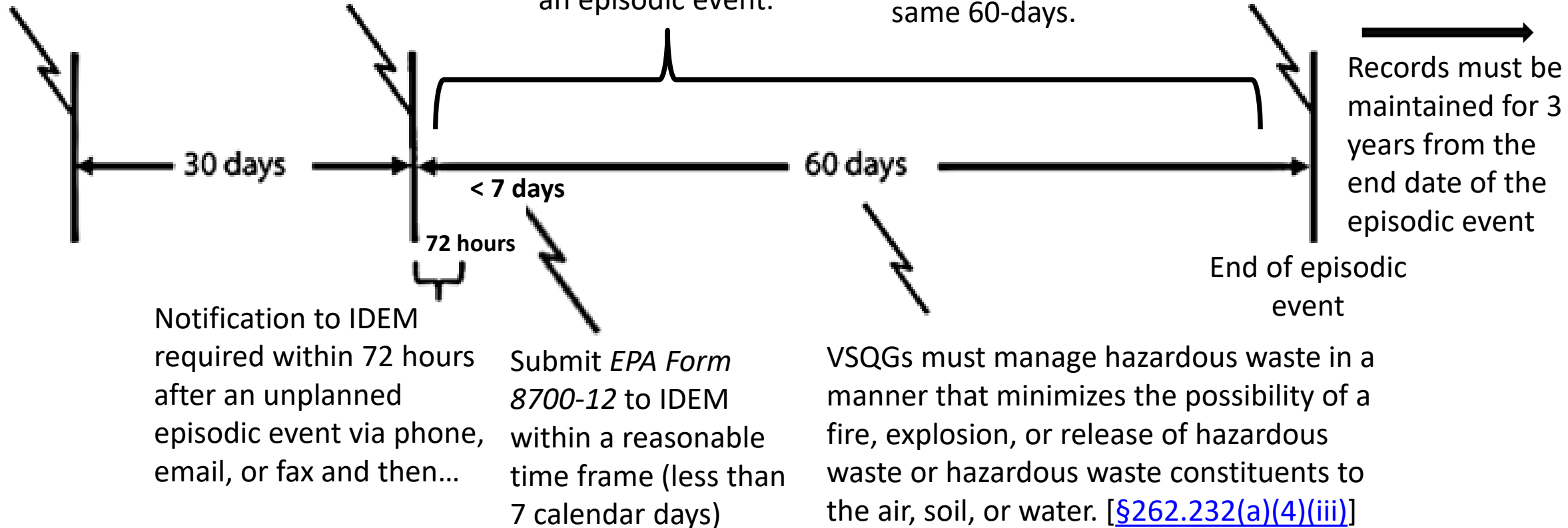
A Timeline for Episodic Generation Provisions

Notification to IDEM no later than 30 calendar days prior to initiating a planned episodic event via *EPA Form 8700-12*

Start of episodic event

SQGs must comply with the conditions in [§262.16\(b\)\(2\)](#) for wastes managed during an episodic event.

VSQGs & SQGs – All HW generated during an episodic event must be manifested to an offsite facility that is permitted to accept it within 60 calendar days from the start of the event. SQGs have option to treat episodic HW within the same 60-days.





Alternative Standards for Episodic Generation

EPA ID NUMBER

If the generator does not already have an EPA identification number, it must obtain one using *EPA Form 8700-12 (automatic upon submitting the Site ID form)*.

- RCRAInfo [Sign In](#)
- Guidance to [Obtain a New RCRA ID Number](#)

Note: Provisional RCRA hazardous waste identification numbers are available for a limited number of situations:

- Drug Lab clean-up activities conducted by law enforcement agencies
 - Spills of hazardous waste on interstate, federal, state, county, or local highways/roads
 - An acute situation posing an immediate threat to human health and/or the environment
- Guidance to [Obtain an Indiana Provisional \(Emergency\) Identification Number \[PDF\]](#)

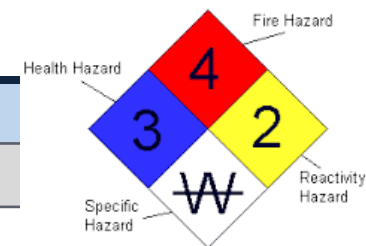
CONTACT

Matthew Peterschmidt (317) 233-8901 weekdays between 8:00 A.M. and 5:00 P.M. If the incident occurs during non-business hours and poses an immediate threat to human health and/or the environment or results from a drug bust, the transporter may remove the waste immediately without an ID number.

The generator shall notify IDEM OLQ the next working day following the incident to obtain an Indiana Provisional Identification Number and shall be responsible for providing it to all entities involved that may require the number.



Alternative Standards for Episodic Generation



ONSITE ACCUMULATION	Episodic HW Stored in Containers
	Both VSQG and SQG
Containers Must Be Marked / Labeled With:	1) the words "Episodic Hazardous Waste,"
	2) an indication of the hazard(s) associated with the contents (e.g., the applicable hazardous waste characteristic(s), a DOT label or placard, an OSHA hazard statement or pictogram, or an NFPA hazard label)
	3) the date that the episodic event began clearly visible for inspection on each container
SQG	VSQG
Containers must comply with §262.16(b)(2)	Containers must be in good condition, compatible with the hazardous waste being accumulated therein, and kept closed except to add or remove waste
ONSITE ACCUMULATION	Episodic HW Stored in Containers
	Both VSQG and SQG
Generators Must:	1) Mark or label the tank with the words "Episodic Hazardous Waste"
	2) Mark or label its tanks with an indication of the hazards of the contents
	3) Use inventory logs, monitoring equipment or other records to identify the date upon which each episodic event and HW accumulation begins
	4) Keep inventory logs or records with the above information on site and readily available for inspection
SQG	VSQG
Tanks must comply with §262.16(b)(3)	Tanks must be in good condition, compatible with the hazardous waste being accumulated therein, have overflow prevention measures or equipment in place, and be inspected daily



Alternative Standards for Episodic Generation

ONSITE ACCUMULATION TIME

- **Both VSQG and SQG** - All hazardous waste generated during an episodic event must be manifested in compliance with 40 CFR 262 Subpart B to an offsite facility that is permitted to accept it within 60 calendar days from the start of the event
- **SQG** - Has the alternate option of treating hazardous waste generated during an episodic event onsite within the same 60-day time frame

EPISODIC EVENT ACTIVITIES

- Each generator is limited to **one** episodic event per calendar year, unless a petition is granted under 40 CFR 262.233
- A generator can start and complete multiple projects (e.g., a small demolition project, a tank cleanout, and removal of excess chemicals) at different dates within the 60-day time limit, so long as all projects are completed within the 60-day start and end dates identified on the notification. Under that scenario, all hazardous waste generated would be considered part of the same episodic event. [[81 FR 85783](#)]



Alternative Standards for Episodic Generation

RECORDKEEPING

VSQGs and SQGs must maintain the following records **for 3 years** from the **end date** of the episodic event ([§262.232](#)):

- Beginning and end dates of the episodic event
- A description of the episodic event
- A description of the types and quantities of hazardous wastes generated during the event
- A description of how the hazardous waste was managed as well as the name of the permitted facility that received the hazardous waste
- Name(s) of applicable hazardous waste transporters
- An approval letter from IDEM if the generator petitioned to conduct one additional episodic event per calendar year

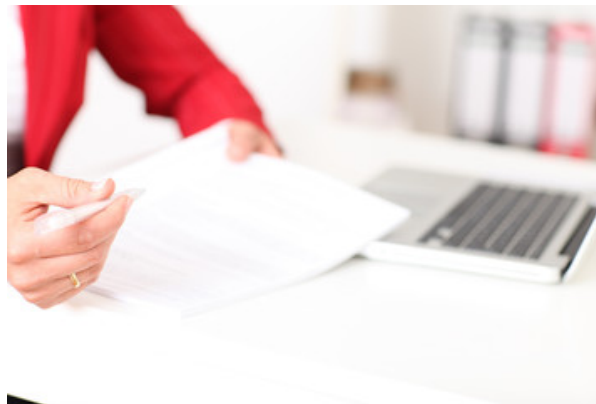


Copies of the notification form and the hazardous waste manifest cover most of the required elements.

Alternative Standards for Episodic Generation

PETITION FOR A SECOND EPISODIC EVENT

- A generator may petition IDEM for a second episodic event in a calendar year without impacting its generator category per [§262.233](#). If the generator has already held:
 - a **planned** episodic event in a calendar year, the petition for an additional **unplanned** episodic event must be submitted to IDEM within 72 hours of the unplanned event
 - an **unplanned** episodic event in a calendar year, the generator may petition IDEM for an additional **planned** episodic event anytime within that calendar year
- The petition must be submitted to IDEM in writing, either printed or electronically



Alternative Standards for Episodic Generation

PETITION FOR A SECOND EPISODIC EVENT (Cont.)

- The petition must include the following:
 - The nature of the episodic event and the reason(s) why an additional episodic event is needed
 - The estimated amount of hazardous waste to be generated / 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
 - 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
- The generator must retain written approval in its records for **3 years** from the date the episodic **event ended**





Alternative Standards for Episodic Generation

FAILURE TO MEET CONDITIONS

- All conditions must be met to retain the episodic generation conditional management benefit
- If any conditions are not met, the generator automatically reverts to the appropriate generator category
 - Should a VSQG fail to meet the specified conditions, it loses the VSQG exemption and becomes the operator of a non-exempt storage facility unless it also immediately complies with all of the conditions for exemption for an SQG or LQG.
 - If an SQG fails to meet any specified condition for exemption, it loses its exemption and becomes the operator of a non-exempt storage facility unless it immediately complies with all of the conditions for an exemption for an LQG." [[81 FR 85783](#)]



Important HW Reminders - Episodic Generation

- The Generator rule provisions make it clear that acute hazardous waste, non-acute hazardous waste, and residues of clean ups of hazardous waste are all considered in making a generator's monthly category determination
- The hazardous waste determination for each solid waste must be made at the point of waste generation, before any dilution, mixing, or other alteration of the waste occurs
- For waste determinations awaiting test results, the generator needs to manage as HW until they get confirmation (*If it's not HW, they can simply remove the label and manage as non-hazardous solid waste*)



Important HW Reminders - Episodic Generation

- Generators need to understand the chemistry and chemical properties of their waste.
 - A SW determined to be non-hazardous at the point of generation can in some cases become hazardous over time while being managed on-site through exposure to the environment (reactive wastes), settling (bi-phasic solvent waste), etc.
 - *Note:* Opposite also true; hazardous wastes can become non-hazardous so long as not diluted or non-LDR compliant treatment

- When identifying a characteristically hazardous waste, a person can rely on generator knowledge to make the determination. Acceptable knowledge may include:
 - process knowledge (e.g., information about chemical feedstocks and other inputs to the production process)
 - knowledge of products, by-products, and intermediates produced by the manufacturing process
 - chemical or physical characterization of wastes





Episodic Generation Eligibility Questions

EPISODIC EVENTS – WHAT QUALIFIES AND WHAT DOESN'T?

Not every case of increased waste production will qualify as an episodic event, and sometimes it is discretionary. ***Make sure your situation is eligible!***

Small, Short-term, or Minor Spill Related Remediation Projects?

- **Maybe?** Consult with CTAP or OLQ about project details in advance if possible. IDEM may be reluctant to include remediation project wastes as eligible types of episodic generation depending on a variety of factors (e.g., waste determination timeframe). *Note:* [\[81 FR 85783\]](#) EPA mentioned that the intent of the episodic relief included addressing wastes from “short-term” remediation activities but later stated that the intent of the rule did not include remediation projects because of the probability to exceed the 60-day time limit, and long-term demolition or remediation projects are non-episodic.

Regularly Scheduled Cleanouts?

- **Maybe?** Depends on the frequency and the reasons for “regular” occurrence. Episodic relief is intended for uncommon or infrequent events, but listed examples of eligible events include cleanouts of equipment, raw or production materials, etc.

TIP: DO NOT store raw materials or products any longer than necessary once you have determined them to be “unusable” because they are deemed wastes at that point and the accumulation clock starts.



Episodic Generation Recommendations

Currently OLQ inspections of generators having notified for Episodic Events has resulted in a high rate of noncompliance (~50%), mostly due to event ineligible or generators not meeting specified timeframes (e.g., waiting too long to get waste offsite).

- If planning a HW generating activity and the generator doesn't know if the event is going to qualify as episodic, we recommend consultation in advance (CTAP or OLQ). We DO NOT recommend notification for a planned event that may not qualify – Notification does not constitute approval and if inspection occurs after you have started or completed an ineligible event – subject to enforcement.
- Advanced planning measures can help ensure that waste from unplanned events can be characterized, managed, and manifested for offsite disposal within the < 60 day time frame. (e.g., identify in advance chemicals of concern, waste management contractors, permitted disposal facilities).
- Try to use planned events to accomplish multiple HW generating activities if possible. Do not delay starting projects after notification has been made.
- Keep inventory current, manageable, and discuss with suppliers how recalls of their products are managed.
- If you have been “unknowingly” storing HW in or around a dilapidated shed somewhere for years, do not try to manage it under the episodic exclusion upon discovery 😊





Episodic Generation - Examples

Episodic Generation –Example 1

Planned event: In early 2021, an SQG plans a maintenance project in the fall and anticipates they are likely to exceed the SQG limit of 1000 kg in October 2021. The event starts September 17, 2021 and is scheduled to be completed by November 5, 2021. Sixty days are over on November 16, 2021.

Planned Event Preparation: *This CAN be an EPISODIC EVENT!*

- SQG identifies waste codes for waste to be generated and estimates waste amounts
- SQG notifies IDEM before August 18, 2021, using the Site ID form (a minimum of 30 days before the event begins)
- SQG determines that all waste must be off site by November 16th and sets up contracts and plans for waste transport and management.

If the event or waste management runs past November 16th, the SQG must begin operating as an LQG

Planned Event Response:

SQG completes maintenance project, manages the hazardous waste under 262.16 standards and sends all waste for hazardous waste management.

If SQG has ANOTHER episodic event (unplanned) in 2021 after the maintenance project is over, it has to petition the state for a second event

After Event:

SQG maintains records for the event for 3 years (a description of the event and notifications & manifests).



Episodic Generation - Examples

Episodic Generation – Example 2

Unplanned Event: In March 2021, a VSQG experiences a storm that causes a spill of product, and they expect the clean up will cause them to exceed the 100 kg limit for March and April 2021.



- The storm occurs on March 8. This is the first day of the event.
- The VSQG isn't sure if the spilled chemicals are hazardous waste but they suspect they may be.
- Sixty days are over on May 7, 2021.

This CAN be an EPISODIC EVENT!

Unplanned Event First Response:

- VSQG notifies IDEM within 72 hours by call or email & follows up with a Site ID form
if the VSQG has already conducted a planned episodic event in January 2021, it must submit a petition and can operate under the episodic standards while awaiting approval from IDEM
- VSQG samples hazardous waste and sets up hazardous waste transportation and disposal
If the clean up material is not hazardous waste or does not exceed the VSQG threshold, the generator can work with IDEM to cancel the even / withdraw notification.



Episodic Generation - Examples

Episodic Generation – Example 2 (continued)

Unplanned Event Additional Response:

- VSQG completes cleanup, manages the hazardous waste under VSQG episodic generator standards and prepares to send all HW offsite through contracts

If the event or waste management runs past May 7th, the VSQG must begin operating as an SQG or LQG, as appropriate

- The VSQG completes removal of HW through manifest on May 7th.

After Event:

- VSQG maintains records for the event for 3 years (notifications and manifests)

If VSQG has ANOTHER episodic event (planned) in 2019 after the clean up is over, it has to petition the state for a second event



P2 Financial Resources and Opportunities for Businesses

Indiana Volkswagen Mitigation Trust Program

Funding for clean air projects focused on equipment and vehicle repowers and replacements



Submit grant applications to:

VWTrust@idem.IN.gov

2020 – 2021 Estimated Schedule of Milestones

Milestone	Estimated Completion
IVMTP Round 3 On-road and Nonroad RFP Posted (60 days)	March 2021
IVMTP Round 3 On-road and Nonroad awards announced	July 2021
DieselWise Indiana with VW DERA Option Round 3 (Focused on nonroad equipment/vehicles)	September 2021
DieselWise Indiana with VW DERA Option Round 3 awards announced	January 2022

*Reasonable chance for a round 4

Contact: SHAWN SEALS
Senior Environmental Manager /
DieselWise Indiana Administrator
IDEM – Office of Air Quality
(317) 233-0425
SSeals@idem.IN.gov

DieselWise Indiana with Volkswagen DERA Option

Funding for projects that reduce harmful tailpipe emissions from diesel-powered vehicles and equipment





P2 Financial Resources and Opportunities for Businesses

- [Rural Energy for America Program](#): Provides grants and loans for energy efficiency and renewable energy projects located in rural areas.
- [Indiana Michigan Power – Commercial and Industrial Rebate Program](#): Indiana Michigan Power offers rebates for HVAC equipment, variable frequency drives, commercial refrigeration equipment, food service equipment and lighting measures for commercial and industrial customers.
- [Green Project Reserve Revolving Loan Fund](#): Low-interest loans for IN communities and businesses to improve wastewater and drinking water infrastructure, including energy efficiency and innovation and green infrastructure.
- [Business Energy Investment Tax Credit](#) (Corporate Tax Credit): A federal investment tax credit (ITC) is available for commercial, industrial, utility, and agricultural sectors who purchase solar, wind, biomass, geothermal, or fuel cell technologies. The credit ranges from 10% - 30%.
- Indiana Office of Energy Development (OED) - [Indiana Energy Tax Incentives](#)
- [Energy Funding Resources](#) Includes grants, rebates, and low-interest loan opportunities unrelated to OED
- Indianapolis Power & Light Company [Ways to Save for Businesses](#)
- [US EPA P2 Resources for Business](#)
- Database of [State Incentives for Renewables & Efficiency](#)

Loans

Located in Indiana and service affordable lending to small businesses for equipment purchases / upgrades

- [CIFI Small Business Loan](#): CIFI makes small business loans to new and existing small businesses and entrepreneurs. A CIFI loan request can range from \$25,000 to \$250,000 and the proceeds can be used for a variety of needs, such as: real estate acquisition, equipment purchases, inventory purchases, improvements, and working capital.
- [Bankable Business Loans](#): A non-profit lender based in Anderson, IN that makes reduced rate loans to small businesses for capital equipment purchases and other business needs. Loans range from \$500 up to \$250,000.

Recycling Resources for IN Businesses



[E-waste recycling services](#)



Recycling [Commercial Plastic Film](#) from your Business



[Plastic Recycling Incorporated](#)

Styrofoam or expanded polystyrene (EPS) recycling - Indianapolis



To find your local recyclables haulers - [solid waste management district](#)



IRC [Webinars & Educational Videos](#)



Here is a list of [Indiana compost haulers](#) Also check out [IFSI's map](#)

ANYONE CAN CONTACT CTAP AT ANYTIME!

Questions?



Be sure to view and
share our brochure!

https://www.in.gov/idem/files/publication_ctap_brochure.pdf

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Indiana Department of Environmental Management

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