



Compliance Advisory

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
Compliance & Enforcement #2020-19 Issued: 12/17/2020

Small Quantity Generators Must Re-Notify by September 1, 2021 and Every Four Years Thereafter

WHO IS AFFECTED BY THIS ADVISORY?

Facilities that meet the definition of a Small Quantity Generator (SQG) of hazardous waste as defined by the Resource Conservation Recovery Act (RCRA). A SQG generates more than 100 kilograms (220 pounds) and less than 1,000 kilograms (2,200 pounds) of RCRA non-acute hazardous waste in any singular calendar month.

WHY IS DEP ISSUING THIS ADVISORY?

This advisory is being issued to notify facilities of the new SQG requirement and to provide information regarding the online re-notification process. The United States Environmental Protection Agency (USEPA) Hazardous Waste Generator Improvements Rule became effective in New Jersey on May 30, 2017. The rule requires SQG facilities to re-notify the USEPA, or their state environmental agency of their hazardous waste generator status every four years [40 CFR 262.18(d)(1)]. SQG facilities re-notify by completing and submitting the Notification of RCRA Subtitle C Activities (Site Identification Form). The re-notification by SQG facilities is due prior to September 1, 2021 and then every four years thereafter (i.e., September 1, 2025, September 1, 2029, etc.).

HOW DO I RE-NOTIFY / WHAT SHOULD I DO?

To re-notify, SQG facilities must electronically submit a Site Identification Form using the RCRAInfo online system managed by USEPA. To access this online system, go to: <https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>. Site Identification Forms are submitted using a service within RCRAInfo called myRCRAid. In order to use this service, a facility representative must first register for a RCRAInfo account and request myRCRAid access to the facility as a Certifier. There is no fee to register for a RCRAInfo account or use the myRCRAid service.

Submittal of a complete Site Identification Form anytime within the four years before the due date will meet the re-notification requirement. Therefore, if an SQG facility submitted an updated Site Identification Form for a reason other than re-notification (for example, to update facility contact information) during the four years prior to the 9/1/21 due date, that facility is not required to make an additional notification until 9/1/2025.

Please Note: DEP previously accepted paper Site Identification Forms (USEPA Form 8700-12) by mail; however, as of September 2019 paper submittals of Site Identification Forms are no longer accepted by DEP. Site Identification Forms will only be accepted by DEP when the forms are submitted electronically via the RCRAInfo system.

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WHO SHOULD I CONTACT WITH QUESTIONS?

Michael Gage

Email: Michael.Gage@dep.nj.gov

NJDEP Hazardous Waste Compliance and Enforcement Field Offices:

Northern Field Office: (973) 656-4470

Central Field Office: (609) 943-3019

Southern Field Office: (856) 614-3658

WHERE CAN I GET MORE INFORMATION?

The following websites can be accessed for additional information:

USEPA Re-Notification Information: <https://www.epa.gov/hwgenerators/re-notification-requirement-small-quantity-generators>

USEPA RCRA Training Modules: <https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcra-training-modules>

RCRAInfo Webpage: <https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>

NJDEP myRCRAid Information:

<https://www.nj.gov/dep/enforcement/docs/Opting%20In%20to%20myRCRAid.pdf>

NJDEP myRCRAid Registration Manual:

<https://www.nj.gov/dep/enforcement/docs/myRCRAid.pdf>

Contact NJDEP: <https://www.nj.gov/cgi-bin/dep/contactdep.pl>

To comment on this advisory: <https://www.nj.gov/dep/enforcement/survey.html>

Please note this advisory is intended to be a summary explanation of Department requirements. It does not include all potentially applicable requirements. If you have any questions related to compliance, please contact an Enforcement number listed above.