



MICHIGAN DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

# EGLE Updates 2024

Wade O'Boyle

Materials Management Division

Environmental Quality Analyst

616-260-7901 | [OboyleW@Michigan.gov](mailto:OboyleW@Michigan.gov)

# Current Statute and Rules

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**Ignorance of the law is no excuse, everyone has access**

- **2020** - Hazardous waste requirements under [Part 111](#) (Hazardous Waste Management) of Act 451 and the Part 111 [administrative rules](#)
- **2017**- Liquid industrial by-products regulations under [Part 121](#) (Liquid Industrial By-products) of Act 451

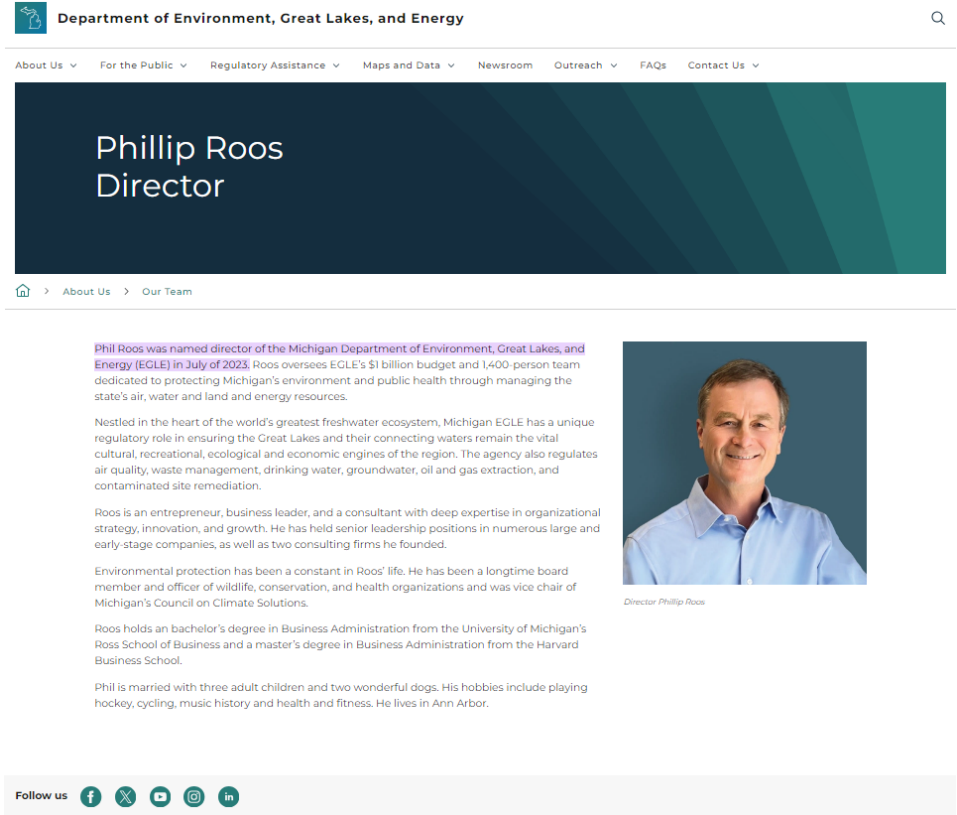
# Current Statute and Rules

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**Ignorance of the law is no excuse, everyone has access:**

- **2023** - Solid waste regulations under [Part 115](#) (Solid Waste Management) of Act 451, the Part 115 [administrative rules](#), and [Part 89](#) (Littering) of Act 451

# EGLE's Director



**Department of Environment, Great Lakes, and Energy**

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## Phillip Roos Director

Home > About Us > Our Team

**Phil Roos was named director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) in July of 2023.** Roos oversees EGLE's \$1 billion budget and 1,400-person team dedicated to protecting Michigan's environment and public health through managing the state's air, water and land and energy resources.


Nestled in the heart of the world's greatest freshwater ecosystem, Michigan EGLE has a unique regulatory role in ensuring the Great Lakes and their connecting waters remain the vital cultural, recreational, ecological and economic engines of the region. The agency also regulates air quality, waste management, drinking water, groundwater, oil and gas extraction, and contaminated site remediation.

Roos is an entrepreneur, business leader, and a consultant with deep expertise in organizational strategy, innovation, and growth. He has held senior leadership positions in numerous large and early-stage companies, as well as two consulting firms he founded.






Environmental protection has been a constant in Roos' life. He has been a longtime board member and officer of wildlife, conservation, and health organizations and was vice chair of Michigan's Council on Climate Solutions.

Roos holds a bachelor's degree in Business Administration from the University of Michigan's Ross School of Business and a master's degree in Business Administration from the Harvard Business School.

Phil is married with three adult children and two wonderful dogs. His hobbies include playing hockey, cycling, music history and health and fitness. He lives in Ann Arbor.



*Director Phillip Roos*

Follow us     

[https://www.michigan.gov/egle/about/team/roos-phillip#:~:text=Phil%20Roos%20was%20named%20director,EGLE\)%20in%20July%20of%202023.](https://www.michigan.gov/egle/about/team/roos-phillip#:~:text=Phil%20Roos%20was%20named%20director,EGLE)%20in%20July%20of%202023.)

# Manifest Exception Reporting

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If a generator has not received documentation that a waste shipment has arrived at the TSDF specified on the manifest:

- Manifest exception report is required
- Use the automated [Generator Notification of Non-Receipt of Hazardous Waste Form](#)

LQG - 35 days Contact TSDF  
- 45 days Contact State of MI

SQG - 60 days Contact State of MI

<https://www.ecfr.gov/current/title-40/section-262.42>

# Manifest Exception Reporting

## Generator Notification of Non-Receipt of Hazardous Waste Form



MICHIGAN DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

### Generator Notification of Non-Receipt of Hazardous Waste

**Important Note:** In addition to submitting this form, please email the following information to [ConferT@Michigan.gov](mailto:ConferT@Michigan.gov) with your EPA Site ID Number listed in the subject line. Submissions with missing information may not receive approval.

- Copy of the manifest, aka the shipping document of the hazardous waste not received.
- Copy of all correspondence pertaining to efforts to contact the transporter and disposal facility about the subject waste delivery.

**For a Large Quantity Generator, this form is to be submitted within 45 days of the date the waste was accepted by the initial transporter.**

**For a Small Quantity Generator, this form is to be submitted within 60 days of the date the waste was accepted by the initial transporter.**

If you need this information in an alternate format, contact [EGLE-Accessibility@Michigan.gov](mailto:EGLE-Accessibility@Michigan.gov) or call 800-662-9278.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations. Questions or concerns should be directed to the Nondiscrimination Compliance Coordinator at [EGLE-NondiscriminationCC@Michigan.gov](mailto:EGLE-NondiscriminationCC@Michigan.gov) or 517-249-0906.

This form and its contents are subject to the Freedom of Information Act and may be released to the public.

# Manifest Exception Reporting

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Only the TSDf on the manifest, working with the generator, is authorized to “rejected shipment” and redirect it to an alternate TSDf, in which case:

- A new manifest is required
- The original ship date begins the 35/45/60-day timeframes for the waste to arrive at the final TSDf

Rejected shipments are also required for other manifest changes (change in waste types, volume, etc.)

# Manifest Exception Reporting

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Exception report must include:

- Legible copy of the manifest
- Explanation from the generator explaining the situation

Send exception reports to:

- Trisha Confer at [ConferT@Michigan.gov](mailto:ConferT@Michigan.gov)
- Phil Roycraft at [RoycraftP@Michigan.gov](mailto:RoycraftP@Michigan.gov)



# Contingency Planning and Quick Reference Guide

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**LQG** - Both a Contingency Plan and Quick Reference Guide must be created, updated, shared with responders, and documented

**SQG** – Like LQGs, SQGs must create and update Contingency Plan and document arrangements with local authorities

# RCRAInfo

Manifests,  
Biennial  
Reports, etc.  
Due  
03/01/2024!

rcrainfo.epa.gov/rcrainfoprod/action/secured/login

EGLE - Generator R... State of Michigan C... EGLE - Waste Regu... EPA's ECHO Site ID Biennial Report EGLE - EGLE Waste... Michigan Safety Co... SafeChem Program... 40CFR - eCFR - 239... EGLE Inspection For...

**RCRAInfo**

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The system enables cradle-to-grave waste tracking of many types of information regarding the regulated universe of RCRA hazardous waste handlers. RCRAInfo characterizes facility status, regulated activities, and compliance histories in addition to capturing detailed data on the generation of hazardous waste from large quantity generators and on waste management practices from treatment, storage, and disposal facilities.

**RCRAInfo Sign In**

User Id  
Password

Sign in

Register Forgot User Id? Forgot Password?

Warning Notice and Privacy Policy

**Warning Notice**

In proceeding and accessing U.S. Government information and information systems, you acknowledge that you fully understand and consent to all of the following:

1. you are accessing U.S. Government information and information systems that are provided for official U.S. Government purposes only;
2. unauthorized access to or unauthorized use of U.S. Government information or information systems is subject to criminal, civil, administrative, or other lawful action;
3. the term U.S. Government information system includes systems operated on behalf of the U.S. Government;
4. you have no reasonable expectation of privacy regarding any communications or information used, transmitted, or stored on U.S. Government information systems;
5. at any time, the U.S. Government may for any lawful government purpose, without notice, monitor, intercept, search, and seize any authorized or unauthorized communication to or from U.S. Government information systems or information used or stored on U.S. Government information systems;
6. at any time, the U.S. Government may for any lawful government purpose, search and seize any authorized or unauthorized device, to include non-U.S. Government owned devices, that stores U.S. Government information;
7. any communications or information used, transmitted, or stored on U.S. Government information systems may be used or disclosed for any lawful government purpose, including but not limited to, administrative purposes, penetration testing, communication security monitoring, personnel misconduct measures, law enforcement, and counterintelligence inquiries; and
8. you may not process or store classified national security information on this computer system.

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

# Hazardous Waste Accumulation Extensions

- A generator must make this request using [online form](#)
- The request must be punctual
- Limited 30- day extension  
R 299.9307(2)
- “...due to unforeseen, temporary, and uncontrollable circumstances”
- Reviewed on a “case-by-case basis”



MICHIGAN DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

## Extension Request Form for Hazardous Waste and Universal Waste Accumulation

**Important Note:** In addition to submitting this form, please email the following information to [ConferT@Michigan.gov](mailto:ConferT@Michigan.gov) with your EPA Site ID Number listed in the subject line. Submissions with missing information may not receive approval.

- Copy of all correspondence pertaining to efforts to have the subject waste collected, to include written responses/notification indicating that the company could not accept the waste.
- Provide photos of the following:
  - Waste accumulation area
  - Any extended waste accumulation area that resulted from the need to exceed the statutory accumulation time
  - Secondary containment, sufficient to accommodate all waste being accumulated

**This form is to be submitted no more than thirty days prior to the need for the extension (30 days prior to exceeding the 90-day accumulation time for large quantity generators, 180-days for small quantity generators, and 365-days for universal waste handlers)**

If you need this information in an alternate format, contact [EGLE-Accessibility@Michigan.gov](mailto:EGLE-Accessibility@Michigan.gov) or call 800-662-9278.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations. Questions or concerns should be directed to the Nondiscrimination Compliance Coordinator at [EGLE-NondiscriminationCC@Michigan.gov](mailto:EGLE-NondiscriminationCC@Michigan.gov) or 517-249-0906.

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# Episodic Generation

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## Episodic Hazardous Waste Generation Basics

Allows a site to bump up once in a calendar year and stay in their generator category if they meet the new “Episodic Event” requirements:

- Requires **notification** and specific timeframes i.e., planned 30 days in advance unplanned within 72 hours of the event
- Management as a hazardous waste for disposal
- Labeling
- Disposal within a limited timeframe



# Episodic Generation

## Episodic Hazardous Waste Generation Notification (Page 7 and 9) EQP5150 - Michigan Site Identification Form - Revised 11/2022

Site ID \_\_\_\_\_

**19. Electronic Manifest Broker**

Y  N Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?

**20. Comments (include item number for each comment)**


**21. Certification:** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.  
**Note: For the RCRA Hazardous Waste Part A Permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator, or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial, Last)	Title
Email	

Signature of legal owner, operator, or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial, Last)	Title
Email	

EGL Environmental Assistance Center  
Phone: 800-662-9278      Page 7 of 18      www.Michigan.gov/EGL  
EQP5150 (11/2022)

Site ID \_\_\_\_\_

**ADDENDUM TO THE SITE IDENTIFICATION FORM  
EPISODIC GENERATOR**

**ONLY fill out this form if:**  
You are an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves the generator to a higher generator category pursuant to R 299.9318. Note: Only one planned and one unplanned episodic event are allowed within one year. Otherwise, you must follow the requirements of the higher generator category. Use additional pages if more space is needed.

**Type of Episodic Event**

<b>Planned</b> (requires 30 day prior notification)	<b>Unplanned</b> (requires notification within 72 hours)
<input type="checkbox"/> Excess chemical inventory removal	<input type="checkbox"/> Accidental Spills
<input type="checkbox"/> Tank Cleanouts	<input type="checkbox"/> Production process upsets
<input type="checkbox"/> Short-term construction or demolition	<input type="checkbox"/> Product recalls
<input type="checkbox"/> Equipment maintenance during plant shutdowns	<input type="checkbox"/> "Acts of nature" (Tornado, hurricane, flood, etc.)
<input type="checkbox"/> Other _____	<input type="checkbox"/> Other _____

Emergency Contact Phone \_\_\_\_\_ Emergency Contact Name \_\_\_\_\_

Beginning Date \_\_\_\_\_ End Date \_\_\_\_\_

**Waste 1**

Waste Description	Estimated Quantity (in pounds)
Federal and/or State Hazardous Waste Codes	

**Waste 2**

Waste Description	Estimated Quantity (in pounds)
Federal and/or State Hazardous Waste Codes	

**Waste 3**

Waste Description	Estimated Quantity (in pounds)
Federal and/or State Hazardous Waste Codes	

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EQP5150 (11/2022)

# Not Empty Containers on the Loose

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## Regulatory Concerns

- Characterization? Hz or Non Hz?
- Manifests or Shipping Documents?
- Transporter Responsibilities
- **Generator Responsibilities**
- Protected from weather, vandals, releases, etc.



# Part 115, Solid Waste Management, Revision 2023

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- Effective March 29, 2023, “roll-out” is occurring
- Language is more inclusive of “Materials Management” compared to the old “Waste” terminology
- Notifications, Registrations, and Permits for types of facilities
- **[Subscribe](#) to Waste and Materials Management News and Updates to get EGLE updates!**



# Manifesting with regards to VSQGs and LIB

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Site notification of VSQG or liquid industrial generator activity using Site ID Form is no longer required

If using a Uniform Hazardous Waste Manifest for shipping LIB from a site with out a Site ID, use:

- “MIVSQG” for shipping VSQG hazardous waste
- “MLIB” for shipping LIBs
- “MIVSQGLIB” for VSQG hazardous waste and LIBs

VSQGS with Site ID must use the Site ID on the Uniform Manifest, including VSQGS with episodic event

# Site ID Information

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Newest Site ID form [EQP5150 - Michigan Site Identification Form - Revised 11/2022\\*](#)

Site ID website

<https://www.michigan.gov/egle/about/Organization/Materials-Management/hazardous-waste/liquid-industrial-byproducts/hazardous-waste-program-forms-and-license-applications>

# Site ID Information

Below is a snapshot of the cover page of the EQP5150

**EGLE** MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
MATERIALS MANAGEMENT DIVISION  
**SITE IDENTIFICATION FORM**

To Pay electronically click this Ink

**You must save this file to your computer before completing the form.**  
*Required under authority of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties*

**1. Reason for Submittal** (Select only one)

<input type="checkbox"/>	Obtaining an initial United States Environmental Protection Agency (EPA) Identification (ID) number, <b>as a new site or new owner</b> , for an on-going regulated activity that will continue for a period of time. <b>FEES DO NOT APPLY TO LIB ONLY SITES. 1. Pay the \$50 fee</b> on-line using MasterCard, VISA, or Discover Card at <a href="https://www.thepayplace.com/mi/deq/siteid">https://www.thepayplace.com/mi/deq/siteid</a> . <b>2. Enter Payment Verification Code: Site!5150. 3. E-mail the form</b> , with a copy of the fee receipt, to <a href="mailto:EGLE-MMD-Site-ID-Reporting@Michigan.gov">EGLE-MMD-Site-ID-Reporting@Michigan.gov</a> ; or, Mail the form with check payable to the State of Michigan to: Michigan Department of Environment, Great Lakes and Energy (EGLE), Cashier's Office—HWUC, P.O. Box 30657, Lansing, Michigan 48909-7741.
<input type="checkbox"/>	Submitting a subsequent notification to change, update, or verify site information for an existing owner of a site with a previously issued Site ID number. E-mail to <a href="mailto:EGLE-MMD-Site-ID-Reporting@Michigan.gov">EGLE-MMD-Site-ID-Reporting@Michigan.gov</a>
<input type="checkbox"/>	* NOTIFYING that <b>SITE IS STILL IN BUSINESS AND NO LONGER GENERATING WASTE (end date required)</b> _____

# Site ID Information

The next page will ask for “Payment Verification Code” - Use the Code **Site!5150** and the code will allow the user to advance to the payment screen

The screenshot shows a web browser window with the URL [thepayplace.com/mi/deq/siteid/challenge.aspx](http://thepayplace.com/mi/deq/siteid/challenge.aspx). The browser's address bar and tabs are visible at the top. The page header includes the EGLE logo and the text "MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY" on the left, and the Michigan.gov logo on the right. The main content area features a heading "Welcome to the State EGLE Site Identification Fee Payment Website!" followed by three paragraphs of text. The first paragraph states that paying online is quick, easy, secure, and available 24/7. The second paragraph explains that the service is a "payment site only" and requires printing and mailing the completed form. The third paragraph provides contact information for questions. Below the text is a form titled "Your Information" with a red circle around the "Payment Verification Code" field, which contains the text "Site!5150". A red asterisk above the field indicates it is required. The form also includes "Submit", "Back", and "Exit" buttons.

**Welcome to the State EGLE Site Identification Fee Payment Website!**

Paying on-line is quick, easy, secure, and available to you 24 hours a day, seven days a week. This application allows you to pay your Site Identification Fee using your MasterCard, Visa, American Express or Discover card.

This on-line service is a **payment site only** and cannot be used to submit your Site Identification form (EQP5150). You must print out and mail or email your receipt with the completed Site Identification form in order for your form to be processed. Reference the Site Identification form instructions for the mailing address and email address.

This Payment Website will not display payment history. If you have questions regarding your Site Identification form or payment history, please call 517-284-6599.

**Your Information** \* Indicates required field

\* Payment Verification Code:

A  LAB

**Questions?**

