

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

**August 3, 1983**

MEMORANDUM

SUBJECT: Response to Region V's EPA ID Number Questions

FROM: Lee Daneker, Acting Deputy Director,  
State Programs and Resource Recovery Division (WH-562)

TO: Art Kawatachi  
Regional Project Officer, Region V

This responds to your May 8, 1983 memo regarding FINDS/RCRA ID number questions. It was prepared with help from Barbara Schick, who was then in the Office of Waste Programs Enforcement. I am sorry it took so long to reply, but several of the questions you raise are thorny.

Please note that the responses to questions 5 and 6 are proposals only; I want to check them with Dan Cirelli in MIDSD who is handling FINDS. The answer proposed for question 6 requires minor alterations to HWDMS, and I would like to receive comments from you and from the other Regions before asking MIDSD to implement those changes. A final answer to your question 8 requires more information from you.

Thank you for raising these issues. We will keep working to develop fully satisfactory answers to all the questions you have raised.

cc: Dan Cirelli (MIDSD)  
Connie Drew (MIDSD)  
HWDMS RPO's and DBA's

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## RESPONSE TO U.S. EPA IDENTIFICATION NUMBER QUESTIONS

- Q1 Do we reassign the previous owner's ID) number when there is a change of ownership?
- A. Yes. The EPA ID number is site specific. The application of this principle to generators and TSD's is relatively clear cut; transporters are discussed further in questions 2 and 5 below. When FINDS is separated from HWDMS, MIDSD will provide HWDMS with the capability to store multiple owners/operators and associated dates. This is scheduled to take place before this calendar year ends. It should meet your needs.
- Q2. Do we assign new ID numbers to TSD facilities and/or generators that move to a new location? Should we also change ID numbers for transporters that change addresses?
- A. Yes. If the owner/operator of a TSD facilities or a generators that move to a new location, that new site is assigned a new ID number.
- B. Yes. Because we may not know whether or not hazardous wastes are or were physically present at the address of a transporter, ID numbers for such sites should be handled as for TSD's and generators -- ID's are site specific.
- Q3. Can we assign more than one ID number to a given location if there are different companies [or divisions of the same company] on the same site, and each requests their own ID number?
- A. Yes. This requires case by case discretion to determine whether the corporate units (and perhaps their waste streams) are separate in some meaningful way. Where corporate accounting practices dictate separate documentation for waste streams, it may make sense for the EPA to likewise monitor them separately. The facility should be viewed in the light of all permit programs to which it is subject -- be sure a second FINDS ID does not interrupt tracking under NPDES, Air, etc. Care must also be taken to prevent subdivision of the waste at one location for the purpose of avoiding regulation, e.g. by slipping under the small generator limitation.
- Q4. In the past, CSC was instructed to assign one ID number to all facilities located on a given military installation. Recently, however, we have received requests from facilities for separate ID numbers where the facilities do not have contractual ties with the installation that they are located on. Examples of this in Region V are Honeywell located on the U.S. Army Twin Cities Arsenal and Firestone on U.S. Army Ravenna Army Ammunition Plant.

A. Historically, handlers were entered into HWDMS on a site basis. This has meant that, in the case of federal sites that have more than one facility on a site, all the facilities receive one common ID number. To deal with this multiple facilities/one site problem, we agree with what you were told by Lee Herwig of EPA's Office of Federal Activities: the Region should issue a separate ID to a facility that is on a federal site but is only associated with the federal government as a lessor of federal property. Since these facilities are independent of the federal government, they should be issued a D&B number and not a GSA ID number.

Q5. How can we track the compliance history of a transporter's temporary storage facility located in Indiana, for example, but with a Michigan ID number? It should be noted that transporters are assigned one ID number for all of their trucking locations.

A. We need to track such transporter activities in HWDMS, and this is currently difficult to do. As was said under question 4, HWDMS tracks facility information based on site location. A transporter is registered in HWDMS based on the site of its headquarters, and it receives one ID number issued to that address. A transporter may have a temporary storage site, such as a garage or depot with short term holding tanks, in a location other than the headquarters site. Regions may conduct compliance monitoring activities at these non-ID numbered, "other" sites. Violations may be found which require enforcement action. Presently, enforcement and compliance monitoring activities at these "other" sites can only be entered and tracked under the facility ID for the transporter's headquarters. All these compliance activity records end up credited to the site (and the Region) where the transporter has headquarters. Historical records concerning hazardous waste handling at these temporary storage sites will not be documented because the only ID issued was that for the headquarters site.

To ease the difficulty in tracking enforcement actions and to correct the problem of site identification for transporter temporary storage sites which become the subject of monitoring activities, we propose that the Region which discovers problems at a temporary storage site issue it a separate ID number, taking care to complete C215, coding the transporter's local activities as a subsidiary of its headquarters. In this way all sites associated with one transporter can be connected. Because this involves a change in FINDS ID issuance policy, it is just a proposal for now. We will discuss it with the people handling FINDS.

Region V suggests using the inspection form which begins the compliance and enforcement monitoring process to establish a hard copy notification file. That sounds fine.

Q6. We would like to assign an ID number and track non-notifiers who handle hazardous waste. We have initiated enforcement actions against these installations, but do not have notification forms (EPA Form 8700-12) to establish an ID number and track compliance.

A. I will request MIDSD and the people handling FINDS to establish a new code – the letter “N” – under data element C219 to identify RCRA non-notifiers being tracked in HWDMS. Note that, where RCRA is the only applicable EPA program, C219 cannot be left blank or the system will not recognize the facility as sufficiently identified.

Region V's suggestion to use the inspection form to establish a hard copy notification file sounds fine.

Q7. How can we track, and States get credit for, inspecting a non-notifier who turns out not to handle hazardous waste? The above situation would originate, for example, as a result of a citizen's complaint where the State conducts a thorough inspection of an installation and concludes it is not an RCRA regulated operation.

A. Same answer as for question 6. If inspection results show a facility is not RCRA regulated, use the new code "N" in C219 and code the entry as non-regulated (C303).

Q8. We would like to archive in HWDMS for future reference the ID number information from sources which no longer or never required use of their ID numbers such as protective filers and duplicate numbers.

A. The role HWDMS will play as an historical record is still under discussion. It would be helpful if the Regions could more fully spell out their needs or anticipated problems in this area.

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460**

**NOVEMBER 21, 1983**

**MEMORANDUM**

**SUBJECT:** Further Clarification of EPA I.D. Numbers for Universities

**FROM:** Lee Daneker  
Acting Deputy Director  
State Program and Resource Recovery Division (WH-563)

**TO:** RCRA Project Officers, Regions I - X

The attached response to an ID number question was prepared by the RCRA/CERCLA Hotline staff. It addresses an often asked question concerning the assignment of EPA I.D. numbers to colleges and universities. The philosophy behind this answer may also be applied to corporate situations.

Attachments

cc: Constance Drew  
HWDMS Database Administrators (via Constance Drew)  
Dan Cirelli

#### IV. RESOLUTION OF ISSUES

Many colleges and universities have asked for clarification on the issue of filing for generator I.D. numbers and the determination of eligibility for status as a small quantity generator. Most of these institutions would like to file for only one EPA I.D. number for the many buildings situated on their campus in order to maintain a single “administrative umbrella” over their several individual points of generation (e.g., laboratories, central chemical storage areas, maintenance shops, power plants, etc.). The physical layout of many campuses tends to confuse the issue of how many notification forms to file. Some campuses, especially those located in metropolitan areas, may be divided by public roads and this further complicates the determination of their generator status. Can universities consider themselves as one generation site in order to spread their “administrative umbrella” over their entire campus?

**RESOLUTION:** Several basic configurations exist for college campuses. The rural or suburban campus might have several buildings on one contiguous piece of property. This would be considered a single or individual generation site even though one or more hazardous wastes are generated from one or more sources. One EPA I.D. number would be assigned and small quantity generator status would be determined by looking at the total hazardous waste generated or accumulated on the site.

Many university campuses are divided by public roads or other rights-of-way which they do not control. Metropolitan campuses are frequently constructed on a number of adjoining city blocks where the various campus buildings are separated by city streets but the buildings may be connected by tunnels or overhead walkways. Even in these cases each generation site (i.e., each city block or each half of a campus bisected by a public road) would be a generator (or SQG) and assigned its own EPA I.D. number.

Hazardous wastes being shipped from one campus building (i.e., generator) to another building (i.e., TSDF) where the sites are divided by a highway would need a manifest while on the highway. The one exception is when the waste is shipped directly across the road. In this case the receiving building is considered "on-site", as defined in 40CFR 260.10 even though they are required to have separate EPA I.D. numbers. (NOTE: The definition of "on-site" is intended to be used only in determining whether or not a generator should initiate a manifest. It does not define two buildings owned and/or operated by the same person but divided by a highway as one generation site). The Agency's philosophy is to identify each shipment of hazardous waste as being from a specific location. The EPA needs to identify who is responsible for the waste (i.e., who created the waste, determined it to be hazardous and is liable for its proper management). This may cause some or all of the waste from a university to be subject to the reduced requirements of the small quantity generator. The Agency is contemplating lowering the small quantity generator exclusion limit which should then capture these wastes.

**SOURCE:** Lee Daneker and Rolf P. Hill

**RESEARCH:** Tony Baney