



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
LAND AND EMERGENCY
MANAGEMENT

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COVERSHEET: EXPLANATION OF CITATION AND/OR TERMINOLOGY CHANGES IN THIS POLICY DOCUMENT

This policy document remains wholly in effect, but some or all of the regulatory citations within it have changed. These changes do not alter the existing regulatory interpretations.

As part of the [2016 Hazardous Waste Generator Improvements Rule](#), many of the regulations that apply to hazardous waste generators were moved to, or reorganized within, title 40 of the Code of Federal Regulations (CFR) part 262. To view a crosswalk between the old and new citations, please visit the [Hazardous Waste Generator Regulations Crosswalk webpage](#).

The Hazardous Waste Generator Improvements Rule also made changes to terms that may be included in this document. The most common term change was replacing “conditionally exempt small quantity generators” (CESQGs) with “very small quantity generators” (VSQGs). In addition, EPA defined the term “central accumulation area” (CAA) to mean a generator’s 90- or 180-day accumulation area for hazardous waste.

A handwritten signature in black ink that reads "Jessica Young". The signature is written in a cursive, flowing style.

Jessica Young
Chief of the Recycling and Generator Branch
Office of Resource Conservation and Recovery

9432.1988(02)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

FEBRUARY 88

4. Identification Numbers

Corporation A owns a large site. Corporation B, a wholly owned subsidiary of Corporation A, is a permitted treatment facility on the site. Corporation B has an identification number associated with this site activity. Corporation C, another wholly owned subsidiary of Corporation A, is also located on this site and will be generating hazardous waste. Should Corporation C use the identification number which is associated with the site, although a different corporation, or is Corporation C required to obtain its own identification number?

Section 262.12 requires a generator to have an EPA identification number before treating, storing, disposing of, transporting, or offering for transportation, hazardous waste. The definition of generator, in Section 260.10 is keyed to both person and site: "any person by site whose act or process produces hazardous waste...". The definition of person in Section 260.10 is "an individual, trust, firm, joint stock company, Federal agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body." The definition of individual generation site in 40 CFR Section 260.10 is "the contiguous site at or on which one or more hazardous wastes are generated." An individual generation site, such as a large manufacturing plant, may have one or more sources of hazardous waste but is considered a single or individual generation site, if the site or property is contiguous.

In this situation Corporation B and Corporation C are two distinct entities (i.e., persons). They must each apply for a separate EPA identification number. Even though identification numbers are usually site-specific, where different people conduct different

regulated activities on a site, a person conducting each regulated activity must obtain an EPA identification number. This does not preclude an EPA Regional office or State from issuing the same number to two persons.

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