MEMORANDUM

SUBJECT: Cruise Ship Identification Numbers and State Required Annual Reporting
            Components

FROM: Elizabeth Cotsworth, Director
            Office of Solid Waste

TO: RCRA Senior Policy Managers
            Regions 1-10

Over the last several months, the Environmental Protection Agency (EPA), Office of Solid Waste has been working with Region 4, Region 9, Region 10, and ten states having cruise ship traffic to facilitate national acceptance of one EPA hazardous waste identification (ID) number per individual cruise ship. This came about because the ships were receiving different numbers from each state in which hazardous waste was off-loaded. Having multiple identification numbers causes the ships to create and maintain duplicate copies of hazardous waste management records, leading to an increased paperwork burden.

Through meetings and conference calls, the participants on this project reached an agreement on the issue. Today, we are asking that individual cruise ships be assigned only one EPA hazardous waste identification number as a generator of hazardous waste for purposes of the Resource Conservation and Recovery Act. The following procedures would apply:

a)   A cruise ship would determine its American-based home port state (the state in which it has corporate offices or its main port of call).
b)   After determining the home port state, the cruise line will notify the selected state or corresponding EPA regional office of its hazardous waste activities.
c)   The cruise ship will identify its hazardous waste generator size in accordance with 40 CFR 261.5(c).
d)   The home port state or EPA regional office will issue an EPA hazardous waste identification number for each individual cruise ship using the current established procedure. The number will reflect the home port state initials and ten alphanumeric characters.

We are recommending that the state or region consider using a ship's registry number,

which is known as the International Maritime Organization (IMO) number, as part of the EPA hazardous waste identification number. The IMO number is generally a five to seven digit number; zeros can be added before or after the number to reach the ten characters required for the EPA hazardous waste identification number. Using the IMO number will allow for coordination with the Coast Guard, as this is the number they use most often.

After the identification number is assigned, it will remain with that ship and be used on all hazardous waste manifests regardless of where the waste is off-loaded in the U.S. The assignment of the EPA ID number will not impact the applicability of state-specific RCRA requirements. For example, when waste is off-loaded in a state, the cruise ship will comply with that particular state's RCRA requirements whether or not that state assigned the ID number. The ship will be required to provide records to the individual state as required by state law.

Many of the states who will not be issuing the ID number expressed an interest in obtaining information provided by the cruise ship in either an annual or biennial report to its home port state. This request for annual report information can be addressed through the existing Biennial Reporting System (BRS). The attachment to this memo provides more specific information on how the ID numbers and annual reports will be incorporated into the EPA's BRS databases.

If you have any questions, please contact Teena Wooten at (703) 308-8751.

Attachment (1)

cc: Key RCRA Contacts, Regions 1 - 10
        RCRA Enforcement Contacts, Regions 1 - 10
        RCRA Data Management Contacts, Regions 1-10
        Tom Kennedy, Association of State and Territorial Solid Waste
         Management Officials (ASTSWMO)
        Anne Dobbs, Texas Natural Resource Conservation Commission (TNRCC)

SINGLE EPA ID NUMBER FOR CRUISE SHIPS AND
STATE ANNUAL REPORTING COMPONENTS

EPA and the Florida Department of Environmental Protection have developed a guidance for assigning identification numbers (ID #) to individual cruise ships. In addition, Florida in conjunction with other states, developed procedures for annual reporting to meet state requirements.

SINGLE EPA ID NUMBER PER CRUISE SHIP:

We are asking that individual cruise ships be assigned a single EPA ID # as generators of hazardous waste for purposes of RCRA. The following procedures would apply:

e)   A cruise ship would determine its American-based home port state (the state in which it has corporate offices or its main port of call).
f)   After determining the home port state, the cruise line will notify the selected state or corresponding EPA regional office of its hazardous waste activities.
g)   The cruise ship will identify its hazardous waste generator size in accordance with 40 CFR 261.5(c).
h)   The home port state or EPA regional office will issue an EPA identification number for each individual cruise ship using the current established procedure. The number will reflect the home port state postal code and ten alpha numeric characters.

We are recommending that the issuing state or region consider a ship's International Maritime Organization (IMO) number (ship registry number). This is generally a five to seven digit number. Zeros can be added before or after the number to reach the required ten spaces. Using the IMO number will allow for coordination with the Coast Guard, as this is the number they use most often.

To identify the EPA ID number as a cruise ship, the SIC code 4481 "deep sea passenger transportation, except by ferry" should be used. In 2002, with the next release of RCRAInfo, NAICS codes will replace SIC codes. The corresponding NAICS code which will then apply is 483112 "deep sea passenger transportation." Anyone wishing to generate a report on cruise ships can structure the query referencing the SIC or NAICS code to retrieve the EPA ID for a cruise ship.

After the identification number is assigned, it will remain with that ship and be used on all hazardous waste manifests regardless of where the waste is offloaded in the U.S. The assignment of the EPA ID number will not impact the applicability of state-specific RCRA requirements. For example, when waste is offloaded in a state, the cruise ship will comply with that particular state's RCRA requirements whether or not that state assigned the EPA ID number. The ship will be required to provide copies of manifest or annual reports as required by state law.

STATE ANNUAL REPORTS FOR INCLUSION INTO THE EPA BIENNIAL REPORT SYSTEM:

Cruise ships, as generators of hazardous waste must comply with the same national and state-specific reporting requirements as all generators. A cruise ship will submit reports to its "home port state."

Currently, the states send reports to EPA to be input into the Biennial Reporting System (BRS) on a biennial basis. However, many states require annual reporting from generators and treatment, storage, and disposal facilities rather than biennial reporting. The BRS system design will allow the input of annual data. Therefore, the annual report required by the state could be modeled from the existing PC-based national electronic submittal/reporting system for BRS. An example of this database is available at:
http: //www.epa.gov/epaoswer/hazwaste/data/brs01/forms.htm and a working model of the BRS type software is available from the State of Florida Department of Environmental Protection at: www.dep.state.fl.us/dwm/programs/hazardous/brs/data.htm.

Submitting Information

Manifest data may be input and submitted via BRS data files, then uploaded to the national RCRAInfo BRS portion of the database. Reports could be generated by the cruise ship company using the BRS-type software, while the states and EPA could generate reports directly from RCRAInfo. The BRS software is capable of reporting waste by individual state, all wastes offloaded by the entire cruise line fleet, by each vessel, and at each state port facility. Using this software, the cruise lines can submit information in flat file format electronically to the home port state or any requesting state. Reports may be submitted electronically or hard copy as required by state law. Data from Canada or other foreign countries with manifest requirements could potentially be aggregated in the same program for reporting purposes.

Storing Information

States wishing to record waste activity outside the federally mandated biennial report cycle may use the national RCRAInfo database to house that information (i.e., the annual report) as long as the data created meets the required file specifications. This information will only be available if it is provided by the States to EPA. Once in the database, any State will have read access to the information. Confidential business information will not be entered into the database.

TYPES OF INFORMATION

Listed below are procedures and examples of the type of information that can be input or retrieved from the state software database.

Targeted Lists:

A drop down menu provides a set of choices to create a list of generators based on specific criteria selected from other drop down menus. Lists can be created based on location (City/County), waste type, site name, or on-site activities. An optional sort is available for waste types and/or sources. The output may be printed, viewed, or copied to a file in EXCEL, DBF, or Text format. The output may be totaled by year or other parameter, or sorted by value. This list may also be used as a filter for other reports to summarize only wastes generated by the given subset of generators.

Summary Reports:

Generation:

A drop down menu provides a set of choices to create a summary of waste generation in tons by year: sorted by Origin, SIC, Source, Waste Code or Waste Type (Form code); fitting a set of criteria as identified in further choice boxes. EPA Waste Code reports will total to more than 100% due to multiple WASTE CODE listings per waste. This summary may optionally be done for only a selected list of generators. There is also an option available to select waste form type and/or source to be included in the summary amounts. The output may be printed, viewed, copied to a file in EXCEL, DBF, or Text format.

Shipments:

A drop down menu provides a set of choices to create a summary of waste shipped off-site in tons by year: sorted by Origin, SIC, Source, Receiving Facility, or Waste Type (Form code); fitting a set of criterion as identified in further choice boxes. This summary may optionally be done for only a selected list of generators. There is also an option available to select waste types and/or sources to be included in the summary amounts. The output may be printed, viewed, copied to a file in EXCEL, DBF, or Text format.