

<u>SUBJECT</u>		<u>DATE</u>
1188. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	AUG 11, 2016
1189. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE	AUG 18, 2016
1190. Product Spills and Waste Determinations	ENCORE	AUG 25, 2016
1191. Product Spills, Waste Determinations, and LDR	ENCORE	SEP 1, 2016
1192. Regulatory Status of Caustic Rinse Waters Contaminated with Trace Solvents	ENCORE	SEP 8, 2016
1193. Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents	ENCORE	SEP 15, 2016
1194. Hazardous Waste "F" Listings and Trace Contamination	ENCORE	SEP 22, 2016
1195. Hazardous Waste "F" Listings and Trace Contamination – Again!	ENCORE	SEP 29, 2016
1196. Hazardous Waste Determinations and Phase Separation		OCT 6, 2016
1197. Asbestos and DOT Relief	ENCORE	OCT 13, 2016
1198. PCB Containers and Concentration of PCBs	ENCORE	OCT 20, 2016
1199. PCB Analytical Waste Disposal Requirements	ENCORE	OCT 27, 2016
1200. PCB Analytical Waste Disposal Requirements – Water vs. Organic Liquids and Non-aqueous Inorganic Liquids		NOV 3, 2016
1201. Listed Waste Codes and Pre-RCRA Wastes	ENCORE	NOV 10, 2016
1202. Purpose of the ≤90-day Hazardous Waste Accumulation Exemption		NOV 17, 2016
1203. Used Oil Eligibility for Turkey and Ham Oils	ENCORE	NOV 23, 2016
1204. PCB Reporting and Recordkeeping Relief	ENCORE	DEC 1, 2016
1205. Defining Criteria for Household Waste Exclusion	ENCORE	DEC 8, 2016
1206. The Household Waste Exclusion and Renovation Debris	ENCORE	DEC 15, 2016
1207. 'Twas the Night before Christmas – The Twenty-Fourth Annual Edition		DEC 24, 2016
1208. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	DEC 29, 2016
1209. Absorbent Additions and Treatment		JAN 5, 2017
1210. Frozen RCRA Wastewater - DOT Liquid or Solid When Manifested?	ENCORE	JAN 12, 2017
1211. DOT Marking Specifications for the "UN", "NA" and "ID" Markings		JAN 19, 2017
1212. Satellite Accumulation within a ≤90-day Accumulation Area	ENCORE	JAN 26, 2017
1213. Washington State-Only Dangerous Waste Markings – Accumulation vs. Pre-Transport	ENCORE	FEB 2, 2017
1214. RCRA Empty Tanker Trailers and Listed Waste Codes	ENCORE	FEB 9, 2017
1215. RCRA Empty vs. DOT Empty	ENCORE	FEB 16, 2017
1216. RCRA Empty vs. DOT Empty II	ENCORE	FEB 23, 2017
1217. Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents	ENCORE	MAR 2, 2017
1218. Multiple Characteristic and Listed Hazardous Waste Codes and the "in lieu of" LDR Principle	ENCORE	MAR 9, 2017
1219. LDR Storage Prohibitions and the One-Year Rule	ENCORE	MAR 16, 2017
1220. LDR Storage Prohibitions and Treated Wastes	ENCORE	MAR 23, 2017
1221. LDR Storage Prohibitions and Treated Hazardous Debris or Contaminated Soil		MAR 30, 2017
1222. LDR Requirements for Universal Wastes		APR 6, 2017
1223. LDR Requirements for Spent Lead-Acid Batteries Being Reclaimed		APR 13, 2017
1224. When is When Defined for the RCRA Phrase "When Reclaimed"?	ENCORE	APR 20, 2017
1225. RCRA Characteristic of Ignitability and DOT Oxidizers	ENCORE	APR 27, 2017
1226. Safety Data Sheets (SDSs) and Hazardous Wastes	ENCORE	MAY 4, 2017
1227. Containers and Tanks – RCRA Wastes vs. TSCA PCB Wastes	ENCORE	MAY 11, 2017
1228. Universal Waste Lamps and Prohibition on Crushing	ENCORE	MAY 18, 2017
1229. Operating Record vs. Operating Log		MAY 25, 2017
1230. Operating Records Not Referenced in "Facility Recordkeeping"		JUN 1, 2017
1231. Used Oil and Weekly Inspections	ENCORE	JUN 8, 2017
1232. Used Oil, Secondary Containment and Response to Spills	ENCORE	JUN 15, 2017
1233. Used Oil and Keeping Containers Closed – Washington State vs. The Feds	ENCORE	JUN 21, 2017
1234. DOT Shipping of Damaged, Defective or Recalled Lithium Batteries	ENCORE	JUN 29, 2017
1235. Conditioned Exclusion for Listed Hazardous Waste Debris Treated via Extraction/Destruction	ENCORE	JUL 6, 2017
1236. Conditioned Exclusion for Characteristic Debris Treated via Immobilization	ENCORE	JUL 13, 2017
1237. Office Waste and RCRA Regulatory Status	ENCORE	JUL 20, 2017
1238. Office Waste Management	ENCORE	JUL 27, 2017
1239. RCRA EPA Identification Numbers – Site Specifics	ENCORE	AUG 3, 2017
1240. RCRA EPA Identification Numbers – Transporters		AUG 9, 2017

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert
CHPRC Environmental Protection, Hanford, WA

SUBJECT: RCRA EPA IDENTIFICATION NUMBERS – TRANSPORTERS

DATE: AUGUST 9, 2017

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Roni Ashley Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Ron Brunke Bob Bullock Bill Cox Laura Cusack Lorna Dittmer Ted Hopkins Sasa Kosjerina Jim Leary Rick Oldham Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson Joel Williams	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Lori Fritz Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Marty Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Kyle Webster Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: RCRA EPA Identification Numbers – Transporters

Q: After last week’s “Two Minute Training” (2MT), the customer understood that EPA identification numbers for dangerous/hazardous waste generators and treatment, storage, and disposal facilities (TSDF) are defined on a by-site, contiguous property basis. However, the customer notices that some of the RCRA transporters they use have EPA ID numbers from out of state, e.g., “TND” (and 9 digits) for Tennessee, “NYD” for New York, etc. Does a transporter picking up dangerous waste in Washington state, require an EPA transporter ID number specific to Washington, i.e., “WAD”?

A: Per [WAC 173-303-240](#), “Requirements for transporters of dangerous waste”, paragraph (2) it states: “A transporter who has previously obtained an EPA/state ID# in another state is not required to obtain a new ID# when operating in Washington state.” Also, at [WAC 173-303-060](#), “Notification and identification numbers” it states: “A company that has obtained an ID# as a “transporter only” can move to a new location and continue to use the same ID#.” These regulations imply that a transporter can have an EPA identification for other states and still operate in Washington state.

As further Federal clarification, the February 26, 1980, Federal Register on page 12752 states:

“If you transport hazardous waste, and do not generate, treat, store, or dispose of hazardous waste, you may submit one form which covers all the transportation activities your company conducts. This form should be submitted to the EPA Regional Office that serves the area where your company has its headquarters or principal place of business. However, if you are a transporter who generates, treats, stores or disposes of hazardous waste, you will have to complete and submit separate Notification Forms to cover each installation.”

Therefore, an out of state transporter is not required to have a WAD EPA ID number to pick up dangerous waste in Washington state. If a RCRA transporter has its headquarters or principal place of business in another state, their EPA ID number will be based on that location. However, if a transporter becomes a generator or TSDF, then an EPA identification number is required for that specific location.

Note: [WAC 173-303-040](#) defines “State” as “any of the several States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands”.

SUMMARY:

- Generator and TSDF EPA ID numbers are by-site and contiguous property specific.
- Transporter EPA ID numbers are not site specific and should be based on the company’s headquarters or principal place of business.
- If a transporter is also a generator or TSDF, a site specific EPA ID number is required for that location.

A PDF of the February 26, 1980, Federal Register, excerpts from WAC 173-303-240 and WAC 173-303-060 are attached. If you have any questions, please contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 8/9/17

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: RCRA EPA Identification Numbers – Transporters

Federal Register February 26, 1980 Pages 12746 to 12754



February 26, 1980 -
Preliminary Notificat

WAC 173-303-240 Requirements for transporters of dangerous waste.

(2) A transporter must have a current EPA/state ID#. Transporters must comply with the notification and identification requirements of WAC 173-303-060. **A transporter who has previously obtained an EPA/state ID# in another state is not required to obtain a new ID# when operating in Washington state.** Transporters who must comply with the generator requirements as a result of a spill at a transfer facility or during transport must obtain a separate generator EPA/state ID# for the spill.

WAC 173-303-060 Notification and identification numbers.

(1) Any person who generates, transports, offers for transport, or transfers a dangerous waste, or who owns or operates a dangerous waste TSD facility must have a current EPA/state identification number (EPA/state ID#). **An EPA/state ID# is issued to TSD facilities and generators by site.** A state registration number is assigned to transfer facilities by site. Any person who offers a dangerous waste to a transporter or to a dangerous waste TSD facility that does not have an EPA/state ID#, or whose EPA/state ID# has been cancelled or withdrawn, is in violation of this regulation.

(2) Every person who must have an EPA/state ID#, and who has not already received their ID#, must notify the department by obtaining and completing a Washington State Dangerous Waste Site Identification Form according to the instructions on the form and submitting the completed form to the department. Any person already assigned an EPA/state ID# must notify the department of any changes to their company's name, mailing address, ownership, physical location, or type of dangerous waste activity, by submitting a revised form. A revised form must be submitted prior to adding or dropping any of the following activities: Permitted treating, storing and/or disposing, immediate recycling, transporting, permit by rule, and/or treatment by generator. Any change in site location will require the issuance of a new EPA/state ID# for waste generation and management facilities. An EPA/state ID# may not be used at new company locations. **A company that has obtained an ID# as a "transporter only" can move to a new location and continue to use the same ID#.** A revised Dangerous Waste Site Identification Form must be submitted to the department. A Dangerous Waste Site Identification Form and instructions for its completion may be obtained by contacting the department.

FROM: Paul W. Martin

DATE: 8/9/17

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