

<u>SUBJECT</u>		<u>DATE</u>
1320.	Treated Hazardous Waste Used as Dust Suppressant	FEB 28, 2019
1321.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE MAR 7, 2019
1322.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE MAR 14, 2019
1323.	Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE MAR 21, 2019
1324.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE MAR 28, 2019
1325.	PCB Decontamination Standard with No Decontamination Performed	ENCORE APR 4, 2019
1326.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required?	ENCORE APR 11, 2019
1327.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel	ENCORE APR 18, 2019
1328.	PCB Concentrations and Micrograms per Centimeters Squared (µg/cm ²)	ENCORE APR 25, 2019
1329.	Operating Record vs. Operating Log	ENCORE MAY 2, 2019
1330.	Operating Records Not Referenced in the “Operating Record” Regulations	ENCORE MAY 9, 2019
1331.	Washington State Used Oil and Mixtures with Other Materials	ENCORE MAY 16, 2019
1332.	Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE MAY 23, 2019
1333.	Printed Circuit Board Recycling – Shredded vs. Whole	ENCORE MAY 30, 2019
1334.	Universal Waste Alkaline Batteries and Self-Transportation	ENCORE JUN 6, 2019
1335.	Universal Waste Lithium Batteries and Self-Transportation	ENCORE JUN 13, 2019
1336.	RCRA Hazard Labeling – A Random Scenario	ENCORE JUN 20, 2019
1337.	Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE JUN 27, 2019
1338.	Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE JUL 3, 2019
1339.	The Hazardous Waste Characteristic of Reactivity (D003)	ENCORE JUL 11, 2019
1340.	Central Accumulation Areas and Signage Requirements	ENCORE JUL 18, 2019
1341.	RCRA EPA Identification Numbers – Site Specifics	ENCORE JUL 25, 2019
1342.	RCRA EPA Identification Numbers – Transporters	ENCORE AUG 1, 2019

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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 1, 2019

CHPRC Projects	CHPRC - Env. Protection	MSA	Hanford Laboratories	Other Hanford Contractors	Other Hanford Contractors
Richard Austin Tania Bates Rene Catlow Richard Clinton Larry Cole Laura Cusack John Dent Lorna Dittmer Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Sasa Kosjerina Melvin Lakes Richard Lipinski Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jeff Westcott	Jeff Bramson Bob Bullock Frank Carleo Bill Cox Noah Cruz Jeanne Elkins Jonathan Fullmer Ted Hopkins Tad Karschnia Barry Lawrence Jim Leary Diane Leist Mitch Marrott Stewart McMahand Brian Mitcheltree Anthony Nagel Linda Petersen Fred Ruck Sean Sexton Dave Shea Ray Swenson Kat Thompson Wayne Toebe Eric Trotta Daniel Turlington Dave Watson	Brett Barnes Michael Carlson Mike Demiter Kip George Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Matt Mills Carly Nelson Michelle Oates Eric Pennala Jon Perry Christina Robison Christian Seavoy David Shaw John Skogle Lana Strickling Greg Sullivan	(TBD) DOE RL, ORP, WIPP Mary Beth Burandt Duane Carter Al Farabee Tony McKarns	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Tom Gilmore Rob Gregory James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Tom Moon Chuck Mulkey Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick 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, "ORD" for Oregon, 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" (e.g., those who do not store or generate waste on site) 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: [40 CFR 260.10](#) 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.

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: RCRA EPA Identification Numbers – Transporters

Federal Register February 26, 1980 Pages 12746 to 12754 – best available copy.

(ATTACHED)

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 or a recycling facility must have a current EPA/state identification number (EPA/state ID#). An EPA/state ID# is issued to TSD facilities, recycling 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 or recycling facility that does not have an EPA/state ID#, or whose EPA/state ID# has been canceled 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 existing EPA/state ID# cannot be transferred to a new company location. A company that has obtained an ID# as a "transporter only" (e.g., those who do not store or generate waste on site) 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.