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RCRA/Superfund/OUST Hotline Monthly Report Question

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4. Manifest Requirements and EPA Identification Numbers

Two facilities, one a nuclear power plant and the other a conventional coal burning power plant, are owned by the same company and occupy adjacent tracts of land divided by a river. The company owns a dam on the river that connects the two tracts. For safety reasons, the dam is not utilized for the transport of hazardous waste between the facilities. A public highway forms the boundary of the properties along one edge. Transport of hazardous waste between the facilities occurs via this public highway. The two facilities currently share one EPA identification number. Can the facilities continue to share one identification number or must each have its own number? Is a manifest required to transport hazardous waste between the facilities?

Each of the facilities will be required to obtain its own EPA identification number. Due to the safety hazard associated with using the dam to move wastes from one facility to the other, no effective company-controlled connecting right-of-way exists. The facilities are two individual sites. Hazardous wastes transported along the public highway from one site to the other must be accompanied by a manifest in accordance with 40 CFR 262.20, which states that a generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a manifest.