

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20480

February 5, 1996

MEMORANDUM

SUBJECT: Universal Waste Notification

FROM: David Bussard, Director  
Characterization Assessment Division

TO: Regional RCRA Branch Chiefs

The universal waste final rule was promulgated on May 11, 1995 (60 FR 25492). This rule promulgated a set of regulatory requirements that streamline the RCRA hazardous waste program for certain hazardous wastes termed "universal wastes". The purpose of this memo is to provide guidance to the Regions on addressing notifications from large quantity handlers of universal waste (LQHUW) that may be received as a result of the notification requirement of the universal waste rule (40 CFR Part 273.32).

Under these streamlined requirements, individuals who accumulate greater than 5,000 kg total of universal waste (LQHUW) must notify their EPA Regional Administrator or State Director of their universal waste activities and receive an EPA identification number. This can be done by sending a one-time written notification or alternatively, submitting the "8700-12" notification form. If the "8700-13" notification form is used, please instruct the notifier to write "LQHUW" or "universal waste" on the portion of the form where activity is checked. EPA or the State would then assign an identification number.

The universal waste notification requirement does not create a national requirement to track universal waste handlers in RCRIS. However, States or Regions may be contacted by universal waste handlers who do not already have an EPA identification number for other reasons and wish to obtain one because of universal waste activity. In these cases, while ID numbers can be generated via RCRIS (using the block-ID number assignment function), it is not necessary to track them in RCRIS. If any State or Region does wish to use RCRIS to track activity occurring under this rule, it should be entered using State/implementer only values and not sent forward to the RCRIS national oversight database.

Please note that the universal waste program is less stringent than the hazardous waste program and is not immediately effective in authorized states. Consequently, the universal waste standards of Part 273, including the notification requirements are applicable as part of the RCRA program only in those states that do not have final RCRA authorization. For additional information on the universal waste rule, please contact Kristina Meson at (202) 260-5736 or Bryan Groce at (202) 260-9550.