

QUESTION: Section 263.20 allows under certain conditions bulk water and intermediate rail transporters to carry a shipping paper in lieu of the Manifest with the shipment. Are these transporters required to have EPA identification numbers?

ANSWER: Yes. Section 263.11 requires all hazardous waste transporters to have EPA identification numbers. While the bulk water or rail transporter's identification number is not required on the shipping paper, the generator is still required to prepare a Manifest. The Uniform Hazardous Waste Manifest (March 20, 1984, Federal Register) regulations require the generator to record on the Manifest the name and EPA identification number of every transporter used between the generator and designated facility.

SOURCE: Carolyn Barley

BOOZ-ALLEN & HAMILTON
FAXBACK 12192