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RAPID ISSUANCE OF IDENTIFICATION NUMBERS TO SITES UNDER INVESTIGATION BY DEA

FEB 5 1987

MEMORANDUM

SUBJECT: Rapid Issuance of Identification Numbers to Sites  
Under Investigation by the Drug Enforcement  
Administration

FROM: Marcia Williams  
Director  
Office of Solid Waste (WH-562)

TO: Regional Project Officers, Regions I - X  
(See list of addressees)

The purpose of this memorandum is to extend EPA's policy for rapid issuance of identification numbers to sites under investigation by the Drug Enforcement Administration (DEA).

Because of this Administration's commitment to halt the illegal manufacture and sale of drugs, the DEA has embarked upon an ambitious program of enforcement against illegal drug manufacturing operations. In particular, DEA Special Agents have been securing clandestine laboratories, many of which generate hazardous waste (e.g., ether, cyanide wastes). Since the waste is usually transported off-site immediately to approved treatment, storage, or disposal facilities, DEA officials need immediate access to generator identification numbers for these sites in order to complete the manifest which must accompany the shipment.

The Agency's policy regarding rapid issuance of identification numbers for emergencies or unusual circumstances allows generators or transporters to obtain provisional identification numbers orally by telephone. See attached Federal Register of December 24, 1980.

The unusual circumstances surrounding the DEA clandestine lab operations warrant extending the rapid issuance policy to such sites. Therefore, we ask that you orally provide emergency identification numbers to DEA agents who may call to obtain the numbers for shipment of wastes from secured laboratories. The numbers can be used on a

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one-time-only basis. The mechanism used by Region V for issuing such numbers (attached) may be a useful format for you to follow. Follow-up requirements to provide completed notification forms (8700-12) would depend upon the individual circumstances at each site as well as upon Regional and State discretion and policy.

If you have any questions about this request, please contact Mike Petruska of my staff on 475-8551.

#### Attachments

#### Addressees:

Ken Blumberg, Region I  
Mark Savedoff, Region II  
Shirley Bulkin, Region III  
Rita Ford, Region IV  
Judy Stone, Region V  
Bob Stender, Region VI  
Jane Ratcliffe, Region VII  
Jon Minkoff, Region VIII  
Matt Mitguard, Region IX  
Judy Fey, Region X

cc: Steve Levy (WH-563)