

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUGUST 15, 1989

William L. Bider
Manager - Environmental Protection
Trans World Airlines, Inc.
P.O. Box 20126
Kansas City International Airport
Kansas City, Missouri 64195

Dear Mr. Bider:

This letter is in response to your letter of July 18, 1989. You ask if TWA's St. Louis Airport facility requires one or more EPA Identification numbers. The determination in this case must be made by State and EPA Region personnel. However, we can provide you with a general description of the relationship between the EPA ID number and a facility location, or "site" requiring such a number.

Generators and transporters of hazardous waste must obtain an EPA identification number from the EPA Administrator before they treat, store, dispose of, transport, or offer for transportation, hazardous waste (40 CFR Section 262.12). The numbers are obtained by submitting a notification form, EPA form 8700-12, to the Administrator. The numbers are issued to each generator on a by-site basis. Therefore, if TWA has facilities in various locations, each facility, by site, must have an EPA ID number.

The definition of "on-site" as referenced by you in your letter and as found in 40 CFR 260.10, may be helpful in determining if TWA's St. Louis Airport facility constitutes one or more "sites." "On-Site" means the same or geographically contiguous property which may be divided by public or private right-of-way . . ." From your description it appears that all of your airport facilities are on a single property. It is unclear, however, whether there are any rights-of way to which the public has access. If there are, the entrance and exit between the properties must be at a cross-roads intersection, i.e. vehicles by not carry unmanifested waste along the public right-of-way. The information you gave us thus seems to show that under EPA's regulations you would only need one identification number. However, as stated previously, the State is the appropriate authority for making this determination. Also, you should be aware that State regulations may dictate a different result.

If you have any further questions in regard to this letter, you may contact Emily Roth of my staff at (202) 382-4777.

Sincerely,

Devereaux Barnes, Director
Characterization & Assessment
Division
Office of Solid Waste