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OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

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FIG - 81 - 12

MEMORANDUM

SUBJECT; States' Role in Assigning EPA Identification Numbers

FROM: Christopher J. Capper  
Acting Assistant Administrator (WH-562A)

TO: PIGS Addressees

Issue:

EPA requires all hazardous waste 1/ generators and transporters and owners and operators of hazardous waste treatment, storage, and disposal facilities to receive and EPA identification number (ID number) before they handle hazardous waste.2/ Identification numbers are issued by the EPA Regional Offices. What role should the States play in assisting the EPA Regional Offices to assign identification numbers?

Decision:

(1) States with interim authorization and States under Cooperative Arrangements are encouraged to assist EPA in assigning EPA identification numbers. Specifically, EPA would like State assistance in distributing and reviewing RCRA Notification and Part A Permit Application Forms. The responsibility for assigning EPA ID numbers will remain in the Regional Offices.

(2) States with their own system of assigning ID numbers are encouraged to use the EPA ID number as the State ID number.

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1/Hazardous waste means hazardous waste as defined by EPA except where specifically noted in this memorandum.

2/Sections 262.12, 263.11, 264.11 and 265.11 establish this requirement for

persons handling hazardous waste in States where EPA is running the hazardous waste program. Sections 123/34 - 36 require for final authorization that States mandate that persons handling hazardous waste within their borders obtain EPA ID numbers. There is no comparable requirement for interim authorization but to date all States have accepted the use of EPA ID numbers.

#### Discussion:

EPA assigns an identification number to each generator and transporter of hazardous waste and to owners and operators of hazardous waste treatment, storage, and disposal facilities who notify the Agency. Generators must not offer their hazardous waste for transportation; transporters must not transport hazardous waste; and owners and operators of hazardous waste management facilities must not treat, store, or dispose of hazardous waste without first receiving an EPA identification number.<sup>3/</sup> EPA assigns a unique identification number to each single site where hazardous waste is generated, treated, stored, or disposed; or, in the case of a transporter, to his principal place of business. The identification number is used on all manifests, reports, and records that EPA requires. The EPA identification number also serves as the "password" for entering and retrieving data from EPA's Hazardous Waste Data Management ADP System (HWDMS). HWDMS is the Agency's major source of information on hazardous waste handlers across the country and is a critical element in implementing Subtitle C of RCRA. EPA is also in the process of tying together HWDMS with other EPA data management systems using the EPA ID number as the common link.

The scheme EPA uses to assign identification numbers is based on the Data Universal Numbering System (DUNS number) that Dun and Bradstreet Incorporated (D & B) has developed. D & B has assigned approximately three million DUNS numbers to all types of businesses across the nation. EPA also assigned temporary "T" numbers to persons who did not have an existing DUNS number.

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All persons who have registered with EPA have been assigned an ID number that is their DUNS number, a "T" number, or for some Federal activities, their GSA Real Property Number.

Seven general steps are involved in assigning an EPA ID number. They are (1) answer requests for blank forms (hazardous waste generators and transporters must submit standard EPA form 8700-12, the EPA Notification Form; owners and operators of new hazardous waste management facilities must submit standard EPA forms 3510-1 and 3510-3, the RCRA Part A Permit Application), (2)

review the submitted information for completeness and obtain any missing information, (3) review the D & B microfiche list to determine if the site has an existing DUNS number, (4) if the site is not listed on the D&B microfiche, check other files within the Region to determine if EPA has assigned an alternate DUNS number to the site under another program which also can be used as the EPA ID number for the RCRA program, (5) if the site does not have a number under another program, assign one of the numbers from the Region's D & B user block, (6) enter information about the activity into HWDMS, and (7) generate an acknowledgement from HWDMS and issue it to the requestor to inform him of his EPA ID number.

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3/See footnote 2.

4/EPA is no longer issuing "T" numbers as of August 1, 1981. Instead, EPA purchased from D & B a block of unassigned DUNS numbers and will assign numbers from this block to persons who do not already have a DUNS number. EPA has begun converting existing "T" numbers to DUNS numbers for facilities requiring RCRA permits and for generators and transporters with activities regulated under other EPA programs.

There has been confusion as to what responsibilities the States can assume in assisting EPA to carry out these steps. In order to obtain final authorization a State must require new hazardous waste generators and transporters and owners and operators of hazardous waste treatment, storage, and disposal facilities to obtain EPA ID numbers before conducting hazardous waste activity (§§123.34 (a), 123.35 (a), and 123.37(b)). Both the "RCRA State interim Authorization Guidance Manual" (June 25, 1980) and the "Additional Guidance for Cooperative Arrangements under Subtitle C or RCRA" (August 5, 1980) provide for States to assist EPA in assigning identification numbers prior to final authorization.

States with interim authorization and States under Cooperative Arrangements are encouraged to assist EPA in steps number 1 and 2 listed above. For now, EPA will retain full responsibility for steps 3 through 7. Several States have expressed an interest in assisting EPA in steps 3, 4, and 5, and further have requested that EPA provide them with blocks of unassigned ID numbers which the State could assign directly and eliminate delays in getting new numbers one at a time from EPA. EPA prefers not to relinquish the responsibility for steps 3, 4, and 5. The Agency must maintain tight control over the assignment of all new numbers since the EPA identification number is the key means of identifying the activity in the Agency's data management systems (EPA will continue to enter into the Agency's ADP data base the name, address and type of activity for all sites that are assigned an EPA ID number).

Recognizing the need for rapid issuance of new identification numbers, EPA has assigned contractor (Computer Sciences Corporation) personnel in each Regional Office to perform steps 3, 4, and 5. The plan is for the contractor to complete these steps within one day. Steps 6 and 7 involve interacting with EPA's ADP system. Since there is presently no capability for States to enter information into HWDMS, no State can perform these steps.

EPA is aware that several States have systems for assigning State identification numbers to hazardous waste (as defined by the State) handlers. Since the federal regulations require the use of EPA identification numbers, EPA strongly encourages States that issue their own identification numbers to adopt the EPA numbering scheme. State use of the PEA scheme should benefit the State programs and the regulated community by:

- eliminating duplication of effort;
- eliminating confusion from the issuance of multiple numbers;
- providing for rapid issuance of numbers directly from the Regional Offices, and
- reducing costs.

Furthermore, States employing the EPA numbering scheme will be better prepared to use the proposed uniform national manifest form 5/ which will accommodate only EPA issued identification numbers.

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5/EPA plans to publish the uniform national manifest form for public review and comment in October 1981.

In cases where a State has adopted a definition of hazardous waste that is broader than the Federal definition, it may not always be clear if the person requesting an identification number in that State handles "Federally defined" hazardous waste or hazardous waste covered under the broader portion of the State definition. These handlers may be issued an EPA identification number since it is not critical that only "bona fide" handlers of Federally defined hazardous waste receive an EPA identification number. However, it would be helpful if States participating in Step 2, above, would point out these cases so that we can make a note in our files that the activity has been issued an EPA ID number but may not be handling Federally defined hazardous waste.