

NOTIFICATION OF RCRA SUBTITLE C  
ACTIVITIES (SITE IDENTIFICATION FORM)

## AUTHORIZATION

Section 3010 of Subtitle C of the Resource Conservation and Recovery Act (RCRA) requires any person who generates, transports, or recycles regulated wastes or who owns or operates a facility for the treatment, storage, or disposal of regulated wastes to notify the U.S. Environmental Protection Agency (EPA) of their activities, including the location and general description of the activities and the regulated wastes handled. Respondents must submit the information required in the Notification of Subtitle C Activity Instructions and Form by completing the RCRA Subtitle C Site Identification Form (EPA Form 8700-12). As required by statute, the EPA promulgated regulations to implement these notification requirements at 40 CFR Parts 260, 261, 262, 263, 264, 265, 266, 270, 273, and 279. The EPA needs this information to determine the universe of persons who generate, handle, and manage these regulated wastes; assign EPA Identification Numbers; and ensure that these regulated wastes are managed in a way that protects human health and the environment as required by RCRA. This is mandatory reporting by the respondents.

The EPA enters notification information submitted by respondents into RCRAInfo, the EPA national database, and assigns EPA Identification Numbers. The EPA uses this information to identify the universe of regulated waste generators, handlers, and managers and their specific regulated waste activities. The EPA also uses the information for tracking and for a variety of enforcement and inspection purposes. Finally, the EPA uses this information to ensure that regulated waste is managed properly, that statutory provisions are upheld, and that regulations are adhered to by facility owners or operators.

Section 3007(b) of RCRA and 40 CFR Part 2, Subpart B, which defines the EPA's general policy on public disclosure of information, both contain provisions for confidentiality. However, the Agency does not anticipate that businesses will assert a claim of confidentiality covering all or part of the Notification of Subtitle C Activity. If such a claim were asserted, the EPA must and will treat the information in accordance with the regulations cited above. The EPA also will assure that the information collection complies with the Privacy Act of 1974 and Office of Management and Budget (OMB) Circular 108.

**Estimated Burden: Facilities** - The reporting and recordkeeping burden for the Notification of Regulated Waste Activity (initial and subsequent) is estimated to average 1 hour for a facility to complete and submit the form, and keep copies of notification and affiliation agreements on site, as applicable. **State Agencies** - The recordkeeping burden for the Notification of Regulated Waste Activity (initial and subsequent) is estimated to average 2 hours for State agencies to review and enter notification information into the RCRAInfo database. There is no reporting associated with this requirement, and as such, there is no reporting burden for State agencies.

To comment on the EPA's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, the EPA has established a public docket for the Information Collection Request (ICR) under Docket ID Number EPA-HQ-OLEM-2016-0182, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the RCRA Docket is (202) 566-0270. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the

public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OLEM–2016–0182 and OMB Control Number 2050-0024 in any correspondence.

## INTRODUCTION

These instructions are designed to help you determine if you are subject to requirements under the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA) for notifying the U.S. Environmental Protection Agency (EPA) of your regulated waste activities. Regulated wastes are hazardous wastes as defined by 40 CFR Part 261, universal wastes as defined by 40 CFR Part 273, and used oil as defined by 40 CFR Part 279. If you are managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27), you also must notify under 40 CFR 260.42 using the RCRA Subtitle C Site Identification Form and Addendums to the Site Identification Form. In addition, you must notify if:

- you are a facility that either recycles hazardous waste with a RCRA permit (i.e., store the hazardous waste prior to recycling), or recycles hazardous waste without first storing the material you must notify under 40 CFR 261.6 (c)(2)(iv) which references 40 CFR 265.75;
- you are a very small quantity generator (VSQGs), previously called conditionally exempt small quantity generators (CESQGs) and you are taking advantage of the episodic generation provision at 40 CFR 262.232 (a);
- you are large quantity generator (LQG) consolidating waste from VSQGs under the control of the same person under 40 CFR 262.17 (f));
- you are closing either a waste accumulation unit or your facility, both prior to closing and after conducting closure performance operations under 40 CFR 262.17 (a)(8)).

The instructions contained in this document will assist you in obtaining or updating an EPA Identification number by completing and submitting the RCRA Subtitle C Site Identification Form (Site ID Form). RCRA is a Federal law. If you are regulated but do not comply with the RCRA notification requirements, you may be subject to civil penalties.

## DETERMINING IF YOU MUST NOTIFY

### HOW TO DETERMINE IF YOU MUST NOTIFY EPA OF YOUR SUBTITLE C ACTIVITIES

All persons who generate, transport, recycle, treat, store, or dispose of hazardous waste are required to notify the EPA (or their State agency if the State is authorized to operate its own hazardous waste program) of their hazardous waste activities. Furthermore, if you are managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27), you also must notify using the RCRA Subtitle C Site Identification Form and the Addendum to the Site Identification Form: Notification of Hazardous Secondary Material Activity. Lastly, if you are a recognized trader arranging for import or export of hazardous wastes, including hazardous waste managed under the alternate management standards of 40 CFR Part 266 or Part 273, you must notify. These persons must obtain an EPA Identification Number unless their solid waste has been excluded from regulation or their hazardous

waste has been exempted as outlined below. These respective notification requirements are found in 40 CFR Parts 260, 261, 262, 263, 264, 265, and 266.

In addition to the discussion below, you will need to refer to 40 CFR Part 261 to help you determine if the waste you handle is both a solid waste and a hazardous waste that is regulated under RCRA. If you need help making this determination after reading these instructions, contact the agency listed for your State. If your facility was granted a solid waste variance under 40 CFR 260.30 prior to July 13, 2015, the management of your hazardous secondary materials under 40 CFR 260.30 is grandfathered under the previous regulations and you are not required to notify.

<b>NOTE</b>	Under the Hazardous Waste Import Regulations, 40 CFR Part 262.84, foreign generators should not apply for an EPA Identification Number. These regulations state that when filling out a U.S. manifest, you must include the name and address of the foreign generator, and the name, address, and EPA Identification Number of the importer. Please contact the U.S. firms involved with your shipments and determine which firm will serve as the U.S. Importer.
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To determine if you handle a solid waste that is also a hazardous waste and regulated under RCRA, ask yourself the following questions:

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#### DO I HANDLE A SOLID WASTE?

40 CFR 261.2 defines “solid waste” as any discarded material that is not excluded under 40 CFR 261.4(a) or that is not excluded by variance granted under 40 CFR 260.30 and 260.31. A discarded material is any material which is:

- Abandoned, as explained in 40 CFR 261.2(b); or
- Recycled, as explained in 40 CFR 261.2(c); or
- Considered inherently waste-like as explained in 40 CFR 261.2(d); or
- A military munition identified as a solid waste in 40 CFR 266.202.

The list of general exclusions can be found in 40 CFR 261.4. If the solid waste that you handle has been excluded, either by rule or special variance, then you do not need to notify the EPA for that solid waste unless otherwise stated in the regulations. If your solid waste was not excluded from regulation, you need to determine if it is a hazardous waste that the EPA regulates. The EPA regulates a solid waste as hazardous waste in two ways:

- By specifically listing the solid waste as a hazardous waste and assigning it a unique EPA Hazardous Waste Code Number; or
- By regulating it because it possesses any of four hazardous waste characteristics and assigning it a generic EPA Hazardous Waste Code Number.

### IS MY SOLID WASTE SPECIFICALLY LISTED AS A HAZARDOUS WASTE?

40 CFR 261.30 through 261.33 identify certain solid wastes that the EPA has specifically listed as hazardous. Persons who handle listed hazardous waste are subject to regulation and must notify the EPA of their hazardous waste activities unless they are exempted as discussed below. Refer to these regulations to see if your solid waste is included as a “listed hazardous waste.” If you are handling a newly regulated hazardous waste and have already notified the EPA prior to that hazardous waste being regulated and already have an EPA Identification Number, you do not need to submit a Subsequent Notification for that newly regulated hazardous waste.

### DOES MY SOLID WASTE POSSESS A HAZARDOUS CHARACTERISTIC?

Even if your solid waste is not specifically listed as a hazardous waste, it may still be hazardous because it exhibits certain hazardous characteristics. These characteristics are:

- Ignitability;
- Corrosivity;
- Reactivity; and
- Toxicity.

40 CFR 261.20 through 261.24 explain each of the characteristics and outlines the testing procedures you should use to determine if your solid waste meets these characteristics. Persons who handle characteristic hazardous waste that is regulated must notify the EPA of their activities unless they are exempted, as discussed below. If you are handling a newly regulated hazardous waste and have already notified the EPA prior to that hazardous waste being regulated and already have an EPA Identification Number, you do not need to submit a Subsequent Notification for that newly regulated hazardous waste.

### HOW TO DETERMINE IF YOU MUST NOTIFY EPA OF YOUR UNIVERSAL WASTE ACTIVITIES

Under 40 CFR Part 273, Subpart C, Large Quantity Handlers of Universal Waste (LQHUW) who accumulate a total of 5,000 kilograms (kg) or more of universal wastes at any time are required to notify the EPA (or their State agency if the State is authorized to operate its own universal waste program) of their universal waste activities and obtain an EPA Identification Number, unless they have previously notified the EPA of their hazardous waste activities. LQHUVs must notify the EPA of their universal waste activities and obtain an EPA Identification Number before meeting or exceeding the 5,000 kg storage limit. Small Quantity Handlers of Universal Waste are exempt from these notification requirements.

**NOTE**

Please refer to the regulations in 40 CFR Part 273 to ensure that you are aware of all the requirements that apply to your universal waste handling activities.

## HOW TO DETERMINE IF YOU MUST NOTIFY EPA OF YOUR USED OIL MANAGEMENT ACTIVITIES

Under 40 CFR Part 279, Subparts E, F, G, and H, respectively, persons who transport used oil; process or re-refine used oil; burn off-specification used oil for energy recovery; or market used oil fuel, are required to notify the EPA (or their State agency if the State is authorized to operate its own used oil program) and obtain an EPA Identification Number, unless they are exempt as outlined below. Off-specification used oil may be burned for energy recovery in an industrial furnace, boiler, or hazardous waste incinerator subject to regulation under Subpart O of 40 CFR Part 264 or 265.

Used oil transporters; used oil processors/re-refiners; off-specification used oil burners; and used oil fuel marketers who have not previously notified the EPA of their hazardous waste activities or notified under 40 CFR Part 266, Subpart E (replaced by 40 CFR Part 279) must notify the EPA to identify their used oil management activities.

**NOTE**

Please refer to the regulations in 40 CFR Part 279 to ensure that you are aware of all the requirements that apply to your used oil management activities.

## EXEMPTIONS

40 CFR 262.13 and 261.6(a)(3) list certain hazardous wastes that are not subject to RCRA regulation. If the hazardous waste that you handle has been exempted, then you do not need to notify the EPA for that hazardous waste.

## USED OIL FOR ENERGY RECOVERY

Used oil that is to be burned for energy recovery and that meets the specification provided under 40 CFR 279.11 is exempt from the regulations. However, the person who first claims that the used oil meets the specification is subject to notification as a used oil fuel marketer and certain other requirements (see 40 CFR Part 279, Subpart H). The burner of fuel that meets the specification in 40 CFR 279.11 is not required to notify.

## USED OIL GENERATORS

Used oil generators are not required to notify the EPA.

## USED OIL GENERATORS OPERATING USED OIL-FIRED SPACE HEATERS

Persons who burn only used oil that they generate (or used oil received from household do-it-yourself used oil changers) in used oil-fired space heaters are exempt from the notification requirement provided that the device is vented to the outdoors and the device is not designed to have a capacity greater than 0.5 million BTU/hour.

## FILING A NOTIFICATION OF RCRA SUBTITLE C ACTIVITIES FORM

### OBTAIN OR UPDATE AN EPA ID NUMBER

If you do not currently have an EPA Identification Number and you handle regulated waste or hazardous secondary material directly or as an E-manifest broker, or if you have an EPA Identification Number and need to revise information regarding your site and/or activity, you must submit a Site Identification Form with a reason for submittal of Obtaining or Updating an EPA ID Number for an on-going regulated activity that will continue for a period of time. Circumstances under which you should submit this notification include:

- If you generate, transport, treat, store, or dispose of hazardous waste. or
- If you recycle hazardous wastes. (Recyclable materials are defined as hazardous wastes that are recycled). The recycling process itself is exempt from regulation, but you must notify the EPA and obtain an EPA Identification Number prior to recycling recyclable materials; or
- If you are a large quantity handler of universal waste. (Notification is required for people who have not previously notified the EPA of their hazardous waste activities or who have not already sent a notification to the EPA as required by 40 CFR 273.32); or
- If you transport, process, or re-refine used oil; burn off-specification used oil for energy recovery; or market used oil. (Notification is required for people who have not previously notified the EPA of their hazardous waste activities or have not notified under 40 CFR Part 279 or under 40 CFR Part 266, Subpart E, which was replaced by 40 CFR Part 279.)
- If you are an eligible academic entity opting into 40 CFR Part 262, Subpart K for managing laboratory hazardous wastes AND you have never submitted site identification information, you must submit this form to notify the appropriate State or EPA Regional Office of your activities.

#### NOTE

You must check with your State to determine if you are eligible to manage laboratory hazardous waste pursuant to 40 CFR Part 262, Subpart K in order for you to notify

- If you will begin managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27) you must submit this form, pursuant to 40 CFR 260.42, to notify the appropriate State or EPA Regional Office of your activities.

#### NOTE

You must check with your State to determine if you are eligible to manage hazardous secondary material under these exclusions in order for you to notify.

- If you are an Electronic Manifest Broker that has a contractual relationship and elects to use the system to obtain, complete and transmit an electronic manifest format supplied by the EPA electronic manifest system for handlers of hazardous wastes.
- If you are either a VSQG or a SQG who, as a result of a planned or unplanned episodic event, generates a quantity of hazardous waste in a calendar month sufficient to cause the facility to move into a more stringent generator category (i.e., VSQG to either an SQG or an LQG; or an SQG to an

LQG).

- If your business moves to another location and you are still conducting activities regulated under RCRA Subtitle C.
- If the contact for your site changes.
- If the ownership of your site changes.
- If an additional owner has been added or replaced since you submitted your last notification.
- If the type of RCRA Subtitle C activity you conduct changes.
- If you have previously submitted site identification information and are an eligible academic entity opting into or withdrawing from 40 CFR Part 262, Subpart K for managing laboratory hazardous wastes, you must use this form.

<b>NOTE</b>	You <u>must</u> check with your State to determine if you are eligible to manage laboratory hazardous waste pursuant to 40 CFR Part 262, Subpart K in order for you to notify.
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- If you are managing or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27), you are required to re-notify by March 1 of each even-numbered year pursuant to 40 CFR 260.42.

<b>NOTE</b>	If your facility was granted a solid waste variance under 40 CFR 260.30 prior to July 13, 2015, the management of your hazardous secondary materials under 40 CFR 260.30 is grandfathered under the previous regulations and you are not required to notify.
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#### HOW MANY FORMS SHOULD I FILE?

If you fall under any of the regulations above to notify EPA, you must submit one Site Identification Form along with the applicable Addendums. For example, if you manage hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27), along with the Site Identification Form you should submit the Notification of Hazardous Secondary Material Activity addendum. If you are an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event pursuant to 40 CFR 262 Subpart L, along with Site Identification Form you should submit the Episodic Generator addendum. And if you are receiving hazardous waste from VSQGs under the control of the same person, along with the Site Identification Form you should submit the LQG Consolidation of VSQG Hazardous Waste addendum.

#### WHERE SHOULD I SEND MY COMPLETED FORM?

Click [here](#) to find access to a contact list containing the address for your State or EPA Regional Office where you should send your completed Site ID Form. The list contains contact names, addresses, phone numbers, and e-mail addresses that you can use to obtain additional information.

Many States use the forms included in this document; some also require additional information. Other



States require that you complete and submit a State-specific form. Information about which form to use is included with the contact list located at the web page noted above. Even if you use the included form, you should check with your State to determine if you need to submit additional information. Also, contact your State if you have any questions about your submission.

After your completed Site ID Form for Obtaining an EPA Identification number or for Obtaining an Electronic Manifest Broker is received and processed, you will be sent a written acknowledgement that will include your EPA Identification Number. You must use this number on all communications with the EPA regarding your regulated waste activities for this site.

## INSTRUCTIONS FOR FILLING OUT THE RCRA SUBTITLE C SITE IDENTIFICATION FORM

Type or print, in black ink, an “X” in all items that apply (if “Yes”, type or print an “X” in the “Y” box, if “No”, type or print an “X” in the “N” box) and then type or print an “X” in all other boxes that apply. In Item 19, provide the required ink signatures. Signatures must be original. Stamped or photocopied signatures are not acceptable. Enter your site’s EPA Identification Number in the top left-hand corner on all pages of the form; for an initial notification for this site, leave the EPA identification Number blank. Use Item 18 – Comments to clarify or provide additional information for any entry. When entering information in the comments section, enter the item number and box letter to which the comment refers. If you must use additional sheets for comments, enter your site’s EPA Identification Number in the top left-hand corner of each sheet.

### ITEM 1 – REASON FOR SUBMITTAL

Place an “X” in the appropriate box to indicate whether you are submitting this form to obtain or update an EPA ID Number for an on-going regulated activity; as a component of the Hazardous Waste Report; to notify that regulated activity is no longer occurring at your site; to obtain or update an EPA ID Number for conducting electronic manifest broker activities; or as a component of a First or a Revised Hazardous Waste Part A Permit Application.

#### OBTAINING OR UPDATING AN EPA ID NUMBER FOR AN ON-GOING REGULATED ACTIVITY THAT WILL CONTINUE FOR A PERIOD OF TIME. (INCLUDES HSM ACTIVITY)

- If your waste activity is regulated under Subtitle C of the Resource Conservation and Recovery Act (RCRA) and the rules promulgated pursuant to the Act (specifically 40 CFR Parts 260-299), you must submit this form to notify the appropriate State or EPA Regional Office of your regulated waste activities and **obtain an EPA Identification Number**.
- If you are an eligible academic entity opting into 40 CFR Part 262, Subpart K for managing laboratory hazardous wastes **AND** you have never submitted site identification information, you must submit this form to notify the appropriate State or EPA Regional Office of your activities.

#### NOTE

You must check with your State to determine if you are eligible to manage laboratory hazardous waste pursuant to 40 CFR Part 262, Subpart K in order for you to notify.

- If you are a recognized trader arranging for export or import of hazardous waste, including those managed under the alternate standards of 40 CFR Parts 266 and 273; or an exporter or importer of spent lead acid batteries (SLABs), you must submit this form to notify the appropriate State or EPA Regional Office of your activities.
- You must use this form to **submit a subsequent notification** if your site already has an EPA Identification Number and you wish to change information (e.g., generator status, new site contact person, new owner, new mailing address, new regulated waste activity, etc.).

- If you have previously submitted site identification information and are notifying (or re-notifying) that you will begin managing, are managing, or have stopped managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27), you must submit this form, pursuant to 40 CFR 260.42, to notify the appropriate State or Regional Office of your activities.

**NOTE**

You must check with your State to determine if you are eligible to manage hazardous secondary material under these exclusions in order for you to notify.

- If you are a very small quantity generator (VSQG), previously called conditionally exempt small quantity generator (CESQG), taking advantage of the episodic generation provision at 40 CFR 262.232 (a), you must submit this form to report your episodic event.
- You must use this form to if you are a small quantity generator (SQG) re-notifying, beginning in 2021 and every four (4) years thereafter, unless a state program has more frequent reporting/notification requirements (See 40 CFR 262.18).
- You must use this form if you are a large quantity generator (LQG):
  - Consolidating wastes from VSQGs under the control of the same person. (See 40 CFR 262.17 (f)). Such LQGs must complete the Addendum to the Site Identification Form: LQG Consolidation of VSQG Hazardous Waste, and identify the RCRA Identification Number of the VSQG (if applicable), name, address, emergency contact phone number and contact name of every VSQG that they are receiving hazardous wastes from.
  - Closing either a waste accumulation unit (optional) or their facility, both prior to closing and after conducting closure performance operations (See 40 CFR 262.17 (a)(8)).

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### SUBMITTING AS A COMPONENT OF THE HAZARDOUS WASTE REPORT

If you are required to submit a Hazardous Waste Report indicating the amount of hazardous waste you generate, treat, recycle, dispose, on-site or ship off-site for subsequent treatment, recycling and disposal, or receive from off-site, you must fill out this form. A Site ID Form submitted with a Hazardous Waste Report is equivalent to a subsequent notification.

- *Site was a TSD facility and/or generator of  $\geq 1,000$  kg of non-acute hazardous waste,  $> 1$  kg of acute hazardous waste, or  $> 100$  kg of acute hazardous waste spill cleanup in one or more months of the report year (or State Equivalent LQG regulations)*

The purpose of this check box is to distinguish between sites that meet the criteria and are required to file a report versus those who file voluntarily or by State-only requirement but were not a treatment, storage, and disposal facility (TSDF) or a Large Quantity Generator (LQG) during the report year. Sites required to file the report should place an "X" in this box, while non-LQG/TSD sites should not. For more information about who must file a report, refer to the [Who Must File a Hazardous Waste Report](#) section.

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### NOTIFYING THAT REGULATED ACTIVITY IS NO LONGER OCCURRING AT YOUR SITE

If you are no longer conducting ANY RCRA Subtitle C federal or state regulated hazardous waste activities, listed on the Site Identification Form, then you can use this Reason for Submittal to deactivate your EPA ID number.

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### OBTAINING OR UPDATING AN EPA ID NUMBER FOR CONDUCTING ELECTRONIC MANIFEST BROKER ACTIVITIES

If you are requesting an EPA ID in order to create and broker manifest transactions for handlers of hazardous waste, then select this Reason for Submittal. An Electronic Manifest Broker is considered a user of the electronic manifest system that has a contractual relationship and elects to use the system to obtain, complete and transmit an electronic manifest form supplied by the EPA electronic manifest system for handlers of hazardous wastes. This designation is for users of the electronic manifest system, defined in 40 CFR 260.10 as a person that elects to use the system to obtain, complete and transmit an electronic manifest format supplied by the EPA electronic manifest system.

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### SUBMITTING A NEW OR REVISED PART A (PERMIT) FORM

If your site is planning to treat, store, or dispose of hazardous waste on-site in a unit that is not exempt from obtaining a hazardous waste permit, you must submit this form as a component of the Part A Permit Application. Also, if the activity at this site (treatment, storage, or disposal) became newly regulated under RCRA Subtitle C and the rules promulgated pursuant to the Act (specifically 40 CFR Parts 260-299), you must submit this form as part of the Part A Permit Application. Also, you must submit a Revised Part A Permit Application to reflect changes that have occurred at your site, you must submit this form as part of your Revised Part A Permit Application.

**ITEM 2 – SITE EPA ID NUMBER**

Provide your EPA Identification Number in Item 2 **for this site**. The first two characters of the EPA Identification Number must be a valid State postal code. Be sure to include your EPA Identification Number at the top of all pages of the form (as well as on any attachments to the Site ID Form).

**NOTE**

If this is your initial notification for this site, leave the EPA Identification Number blank and proceed to Item 3.

**ITEM 3 AND 4 – SITE NAME AND SITE LOCATION ADDRESS**

Provide the legal name of your site and a complete location address. Please note that the address you give for Item 4, Site Location Address, must be a physical address, not a post office box or route number. Only foreign hazardous waste transporters, with their headquarters located outside the U.S., may provide a Site Location Country outside of the U.S.

**NOTE**

A new EPA Identification Number is **required** if you change the location of your site

**ITEM 5 – SITE MAILING ADDRESS**

Provide the Site Mailing Address. If the Mailing Address and the Site Location Address (Item 4) are the same, you can check the “Same as Location Address” checkbox.

**ITEM 6 – SITE LAND TYPE**

**Place an “X”** in the box that **best describes** the land type of your site. Select only one type: Private, County, District, Federal, Tribal (see below), Municipal, State, or Other. If your site’s Land Type could be described as Municipal **and** another Land Type, such as County, District, or Tribal, do not place an “X” in Municipal. Instead, choose the other appropriate Land Type. (For example, if your site’s Land Type is both Municipal and County, you would place an “X” in the box for County.) You may explain this in Item 18 – Comments.

**Tribal**—The land which your site is on belongs to one of the tribes/entities on the list of Federally recognized American Indian tribes and Alaskan Native entities located at:

<https://www.epa.gov/environmental-topics/z-index>.

**ITEM 7 – NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (NAICS) CODE(S)**

Box A (Primary) must be completed. Completing Boxes B-D is recommended, if applicable.

**BOX A**

Provide the North American Industry Classification System (NAICS) code that best describes your site’s **primary** business production process for your products or services. Referencing the latest version of NAICS codes, use the 6-digit code (most specific description) if available for your business; if not, use the 5-digit code; do not enter any four (4) or less digit codes.

Check with your accounting or business staff to determine your NAICS code(s); the NAICS code is used in tax reporting and other business reports. You can obtain additional information about NAICS codes at <http://www.census.gov/eos/www/naics>.

#### BOXES B – D

List other NAICS codes that describe the other business production processes for your site. Referencing the latest version of NAICS codes, use the 6-digit code (most specific description) if available for your business; if not, use the 5-digit code; do not enter any four (4) or less digit codes.

#### NOTE

The Census Bureau has published NAICS Code effective January 1, 2017. Please verify that your NAICS codes are still applicable. You can obtain additional information about the 2017 NAICS codes at: <http://www.census.gov/eos/www/naics>

#### ITEM 8 – SITE CONTACT INFORMATION

Enter the name, title, business address, e-mail address, telephone number, extension, and fax number of the individual who should be contacted regarding the information submitted in the Site ID Form. A subsequent notification is recommended when the Site Contact Person changes. **Do not** enter other contact persons here; if there are other persons, who may be contacted about this submission, list them and their contact information in Item 18 – Comments. If the person completing this form is not the primary site RCRA hazardous waste contact, enter the primary site RCRA hazardous waste contact here and add the contact information for the person completing the form in Item 18 – Comments.

#### NOTE

This is NOT the Facility Permit Contact's information. The Facility Permit Contact information should be entered on the RCRA Hazardous Waste Part A Permit Application.

#### ITEM 9 – LEGAL OWNER AND OPERATOR OF THE SITE

This section should be used to indicate all owners and operators of this site. If your Reason for Submittal is for an Electronic Manifest Broker whose site of business is an office only, and you do not otherwise physically generate, treat, store, recycle or dispose of hazardous waste on site, you do not have to fill out this item.

##### A. NAME OF SITE'S LEGAL OWNER

Provide the name of your site's legal owner(s). This includes owner(s) of the building(s) and land. Please review these definitions:

**Owner** – The person who owns a RCRA site or part of a RCRA site. **Note:** This includes the owner(s) of the building(s) and/or land. This may be an individual, company, or business name. See **Person**.

**Person** – An individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body.

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**DATE BECAME AN OWNER**

Indicate the date on which the above entity became the owner of your site. Enter dates as in this example: For April 22, 2015, enter 04/22/2015. This is optional information.

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**OWNER TYPE**

Place an “X” in the box that **best describes** the owner type for your site. Select only one type: Private, County, District, Federal, Tribal (see below), Municipal, State, or Other. If your site’s Owner Type could be described as Municipal **and** another Owner Type, such as County, District, or Tribal, do not place an “X” in Municipal. Instead, choose the other appropriate Owner Type. (For example, if your site’s Owner Type is both Municipal and County, you would place an “X” in the box for County.) You may explain this in Item 18 – Comments.

**Tribal** - A member of one of the tribes/entities on the list of Federally recognized American Indian tribes and Alaskan Native entities located at: <https://www.epa.gov/environmental-topics/z-index>.

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**LEGAL OWNER ADDRESS**

Enter the address of the legal owner. If the address and the Location of Site (Item 4) are the same, you can check the “Same as Location Address” checkbox.

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**ADDITIONAL OWNER INFORMATION**

Enter the e-mail, telephone number, extension, and fax number of the legal owner.

Use the Comments section to list any additional owners, their names, the dates they became owners, owner type, mailing address, and which owner(s), if any, are no longer owners since your last submission of this form. If necessary, attach a separate sheet of paper. Remember to enter your site’s EPA Identification Number in the top left-hand corner of each sheet.

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**B. NAME OF SITE’S LEGAL OPERATOR**

Provide the name of your site’s operator. Please review these definitions:

**Operator** – The person responsible for the overall operation of a RCRA site. **Note:** This is the legal entity which controls the RCRA site operation rather than the plant or site manager. This is usually a company or business name, but may be an individual. See **Person**.

**Person** – An individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body.

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**DATE BECAME AN OPERATOR**

Indicate the date on which the above entity became the operator of your site. Enter dates as in this example: For April 22, 2015, enter 04/22/2015. This is optional information.

**OPERATOR TYPE**

Place an “X” in the box that **best describes** the operator type for your site. Select only one type: Private, County, District, Federal, Tribal (see below), Municipal, State, or Other. If your site’s Operator Type could be described as Municipal **and** another Operator Type, such as County, District, or Tribal, do not place an “X” in Municipal. Instead, choose the other appropriate Operator Type. (For example, if your site’s Operator Type is both Municipal and County, you would place an “X” in the box for County.) You may explain this in Item 18 – Comments.

**Tribal** - A member of one of the tribes/entities on the list of Federally recognized American Indian tribes and Alaskan Native entities located at: <https://www.epa.gov/environmental-topics/z-index>.

**LEGAL OPERATOR ADDRESS**

Enter the address of the legal operator. If the address and the Location of Site (Item 4) are the same, you can check the “Same as Location Address” checkbox.

**ADDITIONAL OPERATOR INFORMATION**

Enter the e-mail, telephone number, extension, and fax number of the operator.

Use the Comments section to list any additional operators, their names, the dates they became operators, operator type, mailing address, and which operator(s), if any, are no longer operators since your last submission of this form. If necessary, attach a separate sheet of paper. Remember to enter your site’s EPA Identification Number in the top left-hand corner of each sheet.

**NOTE**

A subsequent notification is recommended when the owner or operator of a site changes. Because an EPA Identification Number is site-specific, the new owner will keep the existing EPA Identification Number for that location. If your business moves to another location, the owner or operator must notify the State or EPA Regional Office of this change. Since your business has changed locations, a new EPA Identification Number will be assigned.

**ITEM 10 – TYPE OF REGULATED WASTE ACTIVITY (AT YOUR SITE)**

Place an “X” in box “Y” or box “N” as appropriate for all **current** activities at this site (**as of the date submitting the form**); complete any additional boxes as instructed. **Current** activities mean activities that are in effect when the form is submitted or those that the site plans to begin after EPA Identification Number assignment. The information you provide in Item 10 will be considered current as of the date you certify the form. If the site is no longer a generator as of the date you certify the form, you should mark the “N” (not a generator) box for Generator of Hazardous Waste.

**10.A HAZARDOUS WASTE ACTIVITIES****NOTE**

Listed below are the Federal generator status definitions. If, however, the State where your site is located has definitions different from the Federal definitions, you must use the State definitions.



**10.A.1. GENERATOR OF HAZARDOUS WASTE**

If you generate a hazardous waste that is listed in 40 CFR 261.31 through 261.33 or identified by one or more hazardous waste characteristic(s) contained in 40 CFR 261.21 through 261.24, place an “X” in the appropriate box for the quantity of hazardous waste that is generated per calendar month. The regulations for hazardous waste generators are found in 40 CFR Part 262—specifically 40 CFR 262.14 for very small quantity generators (VSQGs), 40 CFR 262.16 for small quantity generators (SQGs), and 40 CFR 262.17 for large quantity generators (LQGs). Consult these regulations and your State for details about how the regulations apply to your situation. Below is a brief description of the three types of hazardous waste generators.

If “Yes”, place an “X” in only one of the following – a, b, or c. Otherwise, place an “X” in the “N” box.

**a. LQG: Large Quantity Generator**

For purposes of providing information in this report, the site is a Large Quantity Generator (LQG) if the site generates **any** of the following amounts in a calendar month:

- (i) Generates, in any calendar month, (including quantities imported by importer site) 1,000 kilograms (2,200 pounds) or more of non-acute RCRA hazardous waste; **or**
- (ii) Generates, in a calendar month, more than 1 kilogram (2.2 pounds) of any RCRA acute hazardous waste listed in sections 261.31 or 261.33(e); **or**
- (iii) Generates, in any calendar month, more than 100 kilograms (220 pounds) of residue or contaminated soil, waste, or other debris resulting from the cleanup of a spill, into or on any land or water, of any RCRA acute hazardous waste listed in sections 261.31 or 261.33(e).

**NOTE**

If, in addition to being a LQG, you recycle hazardous wastes at your site, mark both this box and Item 10.A.6.

Hazardous secondary material managed under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27) DOES NOT count towards your generator status. However, you must check with your State to determine if you are eligible to manage hazardous secondary material under these exclusions.

**b. SQG: Small Quantity Generator**

This site is a SQG if the site meets **all** of the following criteria:

- (i) Generates, in any calendar month, greater than 100 kilograms (220 pounds) but less than 1,000 kilograms (2,200 pounds) of non-acute hazardous waste; **and**
- (ii) Generates, in any calendar month, less than or equal to 1 kilogram (2.2 pounds) of acute hazardous waste listed in sections 261.31 or 261.33(e); **and**
- (iii) Generates, in any calendar month, less than or equal to 100 kilograms (220 pounds) of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste listed in sections 261.31 or 261.33(e).

**c. VSQG: Very Small Quantity Generator:**

This site is a VSQG if the site meets **all** of the following criteria:

- (i) Generates in any calendar month, less than or equal to 100 kilograms (220 pounds) of

- hazardous waste; **and**
- (ii) Generates in any calendar month, less than or equal to 1 kilogram (2.2 pounds) of acute hazardous wastes listed in sections 261.31, or 261.33(e); **and**
  - (iii) Generates in any calendar month, less than or equal to 100 kilograms (220 pounds) of any residue or contaminated soil, waste, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous wastes listed in sections 261.31, or 261.33(e).

#### 10.A.2. SHORT-TERM GENERATORS

**Place an “X” in the “Y” box** if the site is normally not a generator of hazardous waste, but is currently generating hazardous waste only as the result of a one-time, non-recurring, temporary event that is not related to normal production processes. In other words, short-term generators produce hazardous waste from a particular activity for a limited time and then cease conducting that activity. Short-term generators are not considered episodic generators because episodic generators (i.e., VSQGs and SQGs) regularly generate hazardous waste as part of their operations, but elevate to a higher generator category as a result of a planned or unplanned event. Examples of short-term generators include: (1) one-time highway bridge waste generation; (2) underground storage tank removals; (3) generation of off-specification or out-of-date chemicals at a site that normally doesn’t generate hazardous waste; (4) remediation or spill clean-up at sites with no previous RCRA EPA Identification Number; and (5) site or production process decommissions by a new operator. If you mark “Y”, you must provide an explanation of your short-term generation event in Item 18 –Comments. Otherwise, **place an “X” in the “N” box**.

#### 10.A.3. TREATER, STORER, OR DISPOSER OF HAZARDOUS WASTE

If you treat, store, or dispose of hazardous waste, **place an “X” in the “Y” box**. Part B of a RCRA Hazardous Waste Permit is **required** for this activity. Contact the appropriate office for your State for more information. The Federal regulations for owners and operators of permitted treatment, storage, and disposal facilities (TSDFs) are found in 40 CFR Parts 264, 265, 266, and 270.

**Place an “X” in the “N” box** if any of the following conditions are true for your facility:

- This facility does not receive hazardous waste from other generators and ships all waste off-site for management within the regulatory timeframe.
- This facility is only involved with on-going post-closure activities, corrective actions under the Hazardous and Solid Waste Amendments of 1984 (HSWA), or a consent order under a non-traditional permit or without a RCRA permit being required.
- Receives waste from off-site but does not store greater than 10 days before re-shipping (i.e., transfer facility).

#### NOTE

If your site is a destination facility for universal wastes in addition to being a TSDF for other RCRA hazardous wastes, place an “X” in the “Y” box for both this box **and** Item 11.B.2.

**10.A.4. RECEIVES HAZARDOUS WASTE FROM OFF-SITE**

If you received hazardous waste from another site, whether this waste was received as a commercial transaction or waste received from a restricted group of off-site generators, **place an "X" in the "Y" box.** Otherwise, **place an "X" in the "N" box.** Item 10.A.5 "Receives Hazardous Waste from Off-site" is not for transfer facilities. If you are a transfer facility receiving hazardous waste from off-site, you should mark item 11.A.1.b (Transfer Facility).

**10.A.5. RECYCLER OF HAZARDOUS WASTE**

**Place an "X" in the "Y" box** if you recycle regulated hazardous wastes (recyclable materials) at your site. Otherwise, **place an "X" in the "N" box.** If you mark "Y", then mark the subsequent box that identifies whether you recycle regulated hazardous wastes, with or without storage prior to recycling. The Federal regulations for owners and operators of sites that recycle hazardous waste are found in 40 CFR 261.6. You also may be subject to other Federal and State regulations; in some cases, a permit is required.

**NOTE**

The 2016 Hazardous Waste Generator Improvements Final Rule requires that both facilities that do store prior to recycling and facilities that do not store prior to recycling submit a Hazardous Waste Report.

If your site, in addition to being a recycling site for hazardous waste, treats, stores, or disposes of hazardous waste, place an "X" in the "Y" box for both this box **and** Item 10.A.4. If your site is a destination facility for universal wastes in addition to being a recycling site for other RCRA hazardous wastes, place an "X" in the "Y" box for both this box **and** Item 11.B.2.

**10.A.6. EXEMPT BOILER AND/OR INDUSTRIAL FURNACE**

If **"Yes"**, place an **"X"** in all that apply. Otherwise, **place an "X" in the "N" box.**

**a. Small Quantity On-Site Burner Exemption**

You burn small quantities of hazardous waste in an on-site boiler or industrial furnace in accordance with the conditions in 40 CFR 266.108, place an "X" in the box to indicate that you qualify for the Small Quantity On-Site Burner Exemption.

**b. Smelting, Melting, and Refining Furnace Exemption**

You process hazardous wastes in a smelting, melting, or refining furnace solely for metals recovery, as described in 40 CFR 266.100(d), or to recover economically significant amounts of precious metals, as described in 40 CFR 266.100(g), or if you process hazardous wastes in a lead recovery furnace to recover lead, as described in 40 CFR 266.100(h), place an "X" in the box to indicate that you qualify for the Smelting, Melting, and Refining Furnace Exemption.

**10.B. WASTE CODES FOR FEDERALLY REGULATED HAZARDOUS WASTES**

Please list the waste codes of the Federal hazardous wastes (described in 40 CFR Part 261) handled at your site. List them in the order they are presented in the regulations using the appropriate 4-digit code(s) (e.g., D001, D003, F007, U112).

**NOTE**

If you handle more hazardous wastes than will fit under Item 10.B, please continue under Item 18 – Comments or on an extra sheet. Remember to include your EPA Identification Number on the top of each page. If you handle a large number of codes, you may copy the list in this document and mark the ones that you handle. Attach any additional sheets to the Site ID Form. Remember to include your EPA Identification Number on the top of each page.

A healthcare facility operating under Part 266 Subpart P is not required to list the waste codes for its hazardous waste pharmaceuticals.

**LIST**

Click [here](#) for a list of the nationally-defined Hazardous Waste Codes.

**10.C. WASTE CODES FOR STATE-REGULATED (NON-FEDERAL) HAZARDOUS WASTES**

If you manage State-regulated hazardous wastes that have a State waste code, enter the appropriate code(s) in the box(es) provided. Please list the waste codes of the State-regulated hazardous wastes handled at your site in the order they are presented in the regulations.

**NOTE**

If you handle more hazardous wastes than will fit under Item 10.C, please continue under Item 18 – Comments or on an extra sheet. Remember to include your EPA Identification Number on the top of each page.

**ITEM 11– ADDITIONAL REGULATED WASTE ACTIVITIES****11.A OTHER WASTE ACTIVITIES**

Place an “X” in the “Y” or “N” box as appropriate for all additional current regulated waste activities at this site (**as of the date submitting the form**); complete any additional boxes as instructed. **Current** activities mean activities that are in effect when the form is submitted or those that the site plans to begin after EPA Identification Number assignment. The information you provide in Item 11 will be considered current as of the date you certify the form.

**11.A.1. TRANSPORTER OF HAZARDOUS WASTE**

If “Y”, place an “X” in all that apply. Otherwise, place an “X” in the “N” box.

**a. Transporter**

You transport hazardous waste within the U.S. The Federal regulations for hazardous waste transporters are found in 40 CFR Part 263.

**b. Transfer Facility**

You are a hazardous waste transfer facility, at your site, if you hold manifested hazardous waste(s) at your site for a period of ten (10) days or less while the waste is in transit. The Federal regulations for hazardous waste transfer facilities are found in 40 CFR 263.12.

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### 11.A.2. UNDERGROUND INJECTION CONTROL

If you generate, treat, store, or dispose of hazardous waste and place the waste or its residuals into an underground injection well (e.g., a Class I well) located at your site, **place an “X” in the “Y” box**. Otherwise, **place an “X” in the “N” box**. The Federal regulations for owners and operators of underground injection wells are found in 40 CFR Part 148.

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### 11.A.3. UNITED STATES IMPORTER OF HAZARDOUS WASTE

**Place an “X” in the “Y” box** if you import hazardous waste from a site located in a foreign country into the U.S. Refer to 40 CFR 262.10(e) and 40 CFR 262.84 for additional information. Otherwise, **place an “X” in the “N” box**.

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### 11.A.4. RECOGNIZED TRADER

**Place an “X” in the “Y” box** if you are a recognized trader, defined in 40 CFR 260.10 as a person domiciled in the United States, who acts to arrange and facilitate transboundary movements of wastes destined for recovery or disposal operations, either by purchasing from and subsequently selling to United States and foreign facilities, or by acting under arrangements with a United States waste facility to arrange for the export or import of the waste. Otherwise, **place an “X” in the “N” box**. Mark all that apply.

- a. **Importer**
- b. **Exporter**

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### 11.A.5. IMPORTER/EXPORTER OF SPENT LEAD-ACID BATTERIES (SLABS) UNDER 40 CFR PART 266 SUBPART G

**Place an “X” in the “Y” box** if you are an importer or exporter of spent lead-acid batteries (SLABs) being managed domestically under 40 CFR 266 Subpart G to obtain an EPA Identification number (see 40 CFR 266.80(a)(6), (8) - (10)). Otherwise, **place an “X” in the “N” box**. Mark all that apply.

- a. **Importer**
- b. **Exporter**

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## 11.B UNIVERSAL WASTE ACTIVITIES

Refer to your State-specific requirements and definitions for universal waste. Also, refer to 40 CFR 261.9 and 40 CFR Part 273 for the Federal regulations covering universal waste. **Complete parts 1 and 2.**

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### 11.B.1 LARGE QUANTITY HANDLER OF UNIVERSAL WASTE (LQHUW)

You are a Large Quantity Handler of Universal Waste (LQHUW) if you accumulate a total of 5,000 kg or more total of universal wastes (batteries, pesticides, mercury-containing equipment, or lamps – calculated collectively) at any time. This designation is retained through the end of the calendar year in which the 5,000 kg limit is met or exceeded. **Place an “X” in the “Y” box**, then **place an “X”** in the appropriate box(es) to indicate the type(s) of universal wastes managed at your site. Otherwise, **place an “X” in the “N” box**.

If your State has other additional universal wastes, indicate what they are by **placing an "X"** in the corresponding box(es) (11.B.1.e - g).

### 11.B.2 DESTINATION FACILITY FOR UNIVERSAL WASTE

**Place an "X" in the "Y" box** if you treat, dispose, or recycle universal wastes on-site. Otherwise, **place an "X" in the "N" box**. A hazardous waste permit is required if you treat or dispose of universal wastes; a permit may be required if you recycle universal wastes.

#### NOTE

If your site, in addition to being a destination facility for universal wastes, is also a TSDF for RCRA hazardous wastes, **place an "X" in the "Y" box** for both this **and** Item 10.A.4. In addition, if your site recycles RCRA hazardous wastes, **Place an "X" in the "Y" box** for both this **and** Item 10.A.6.

### 11.C. USED OIL ACTIVITIES

**Place an "X"** in the appropriate box(es) to indicate which used oil management activities are taking place at this site. Otherwise, **place an "X" in the "N" box**. The Federal regulations for used oil management are found in 40 CFR Part 279. Also, the facility should check with its State to find out if there are additional State-specific reporting requirements for used oil activities. **Complete all parts 1 through 4.**

#### 11.C.1. USED OIL TRANSPORTER

**Place an "X" in the "Y" box**, then **place an "X" in all that apply**. Otherwise, **place an "X" in the "N" box**.

**a. Transporter**

You transport used oil within the U.S. The Federal regulations for used oil transporters are found in 40 CFR 279.40-47.

**b. Transfer Facility (at your site)**

You own or operate a used oil transfer facility. The Federal regulations for used oil transfer facilities are found in 40 CFR 279.40-47.

#### 11.C.2. USED OIL PROCESSOR AND/OR RE-REFINER

**Place an "X" in the "Y" box**, then **place an "X" in all that apply**. Otherwise, **place an "X" in the "N" box**.

**a. Processor**

You process used oil. The Federal regulations for processors of used oil are found in 40 CFR 279.50-59.

**b. Re-refiner**

You refine used oil. The Federal regulations for re-refiners of used oil are found in 40 CFR 279.50-59.

**11.C.3. OFF-SPECIFICATION USED OIL BURNER**

Place an “X” in the “Y” box, to indicate that you are conducting this used oil management activity. Otherwise, place an “X” in the “N” box.

**11.C.4. USED OIL FUEL MARKETER**

Place an “X” in the “Y” box, then place an “X” in all that apply. Otherwise, place an “X” in the “N” box.

- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burners**  
You are a marketer who directs shipment of off-specification used oil to off-specification used oil burners. The Federal regulations for used oil fuel marketers are found in 40 CFR 279.70-75.
- b. Marketer Who First Claims the Used Oil Meets the Specification**  
You are the first to claim that used oil meets the used oil specifications established in 40 CFR 279.11.

**NOTE**

If either of these boxes is marked, you must also notify (or have previously notified) as a used oil transporter (11.C.1), used oil processor/re-refiner (11.C.2), or off-specification used oil fuel burner (11.C.3), unless you are a used oil generator. (Used oil generators are not required to notify.)

**11.D.1 MANAGING HAZARDOUS WASTE PHARMACEUTICALS UNDER 40 CFR 266 SUBPART P****NOTE**

40 CFR Part 266, Subpart P must be in effect in your State in order to report as a healthcare facility or reverse distributor. See EPA’s website for more information about these regulations at <http://www.epa.gov/hwgenerators/final-rule-management-standards-hazardous-waste-pharmaceuticals-and-amendment-p075>.

40 CFR Part 266, Subpart P is mandatory for the management of hazardous waste pharmaceuticals at all healthcare facilities (except healthcare facilities that are VSQGs) and reverse distributors. The rule is effective at the federal level on August 21, 2019. Authorized States have until July 1, 2021 to adopt this rule. When the rule is effective in your State, healthcare facilities and reverse distributors **must** notify EPA of these pharmaceutical activities using the Site ID Form. If a healthcare facility that is a VSQG chooses to operate under Subpart P, it also must notify using the Site ID Form.

A healthcare facility that is co-located within a larger facility that is not a healthcare facility (e.g., a clinic at a military base, school, or manufacturer), must notify that it is operating as a healthcare facility under 40 CFR Part 266, Subpart P, unless the entire site is a VSQG.

Place an “X” in the “Y” box, if you are a healthcare facility or reverse distributor operating under 40 CFR Part 266, Subpart P for the management of hazardous wastes pharmaceuticals. Otherwise, place an “X” in the “N” box. If you mark “Y” for this box, you must place an “X” in one of the following to indicate whether you are a healthcare facility or reverse distributor.

## 1. Healthcare Facility

You are a healthcare facility if you are lawfully authorized to –

- (1) Provide preventative, diagnostic, therapeutic, rehabilitative, maintenance or palliative care, and counseling, service, assessment or procedure with respect to the physical or mental condition, or functional status, of a human or animal or that affects the structure or function of the human or animal body; or
- (2) Distribute, sell, or dispense pharmaceuticals, including over-the-counter pharmaceuticals, dietary supplements, homeopathic drugs, or prescription pharmaceuticals. This definition includes, but is not limited to, wholesale distributors, third-party logistics providers that serve as forward distributors, military medical logistics facilities, hospitals, psychiatric hospitals, ambulatory surgical centers, health clinics, physicians’ offices, optical and dental providers, chiropractors, long-term care facilities, ambulance services, pharmacies, long-term care pharmacies, mail-order pharmacies, retailers of pharmaceuticals, veterinary clinics, and veterinary hospitals. This definition does not include pharmaceutical manufacturers, reverse distributors, or reverse logistics centers.

## 2. Reverse Distributor

You are a reverse distributor if you receive and accumulate prescription pharmaceuticals that are potentially creditable hazardous waste pharmaceuticals for the purpose of facilitating or verifying manufacturer credit. Any person, including forward distributors, third-party logistics providers, and pharmaceutical manufacturers, that processes prescription pharmaceuticals for the facilitation or verification of manufacturer credit is considered a reverse distributor.

### 11.D.2 WITHDRAWING FROM MANAGING HAZARDOUS WASTE PHARMACEUTICALS UNDER 40 CFR 266 SUBPART P

Healthcare facilities that are no longer a large quantity generator or small quantity generator may withdraw from managing hazardous waste pharmaceuticals under 40 CFR Part 266, Subpart P. Reverse distributors may NOT withdraw from this rule.

Place an “X” in the “Y” box, if you are a healthcare facility that is no longer an LQG or SQG and you want to withdraw from operating under 40 CFR Part 266, Subpart P for the management of hazardous wastes pharmaceuticals. Otherwise, place an “X” in the “N” box.

### ITEM 12 – ELIGIBLE ACADEMIC ENTITIES WITH LABORATORIES

<b>NOTE</b>	40 CFR Part 262, Subpart K must be in effect in your State in order to report as an eligible academic entity with laboratories. See EPA’s website for more information about these regulations at <a href="http://www.epa.gov/hwgenerators/regulations-hazardous-waste-generated-academic-laboratories">http://www.epa.gov/hwgenerators/regulations-hazardous-waste-generated-academic-laboratories</a>
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40 CFR Part 262, Subpart K is an optional alternative set of requirements for eligible academic entities with laboratories. Certain generators (i.e., eligible academic entities as defined in 40 CFR 262.200) are eligible to operate under Subpart K for management of their hazardous wastes in laboratories in lieu of



40 CFR 262.15 (or 40 CFR 262.14 for VSQGs). Eligible academic entities with laboratories that generate hazardous waste that elect to opt into Subpart K, are currently operating under Subpart K, or subsequently withdraw from Subpart K must complete this section to meet the notification requirements of this Subpart. Refer to 40 CFR 262.203 and 40 CFR 262.204.

**NOTE**

Eligible academic entities with laboratories must complete a separate Site ID Form for each site (i.e., EPA Identification Number) that is managing hazardous waste under Subpart K. All laboratories with the same EPA Identification Number will be regulated under this Subpart. If eligible academic entities with laboratories withdraw from Subpart K, all laboratories with the same EPA Identification Number associated with the withdrawal from Subpart K will be regulated under 40 CFR 262.15 (or 40 CFR 262.14 for VSQGs).

### 12.A OPTING INTO OR CURRENTLY OPERATING UNDER 40 CFR PART 262, SUBPART K FOR THE MANAGEMENT OF HAZARDOUS WASTES IN LABORATORIES

Place an **“X”** in the **“Y”** box, if you are an eligible academic entity and you elect to opt into or are currently operating under 40 CFR Part 262, Subpart K for the hazardous wastes generated in your laboratories. Otherwise, place an **“X”** in the **“N”** box. If you mark **“Y”** for this box, you must place an **“X”** in at least one of the following to indicate your type of eligible academic entity. **Place an “X” in all that apply:**

**a. College or University**

You are an eligible college or university if you are a private or public, post-secondary, degree-granting, academic institution, that is accredited by an accrediting agency listed annually by the U.S. Department of Education.

**b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university**

You are an eligible teaching hospital if you are a hospital that trains students to become physicians, nurses, or other health personnel and is either: (1) owned by a college or university, or (2) has a master affiliation agreement and program letter of agreement, as defined by the Accreditation Council for Graduate Medical Education, with an accredited medical program or medical school.

**c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university**

You are an eligible non-profit institute if you are an organization that conducts research as its primary function and files as a non-profit organization under the tax code of 26 U.S.C. 501(c)(3) and is either: (1) owned by a college or university, or (2) has a formal written affiliation agreement with a college or university that establishes a relationship between institutions for the purposes of research and/or education and is signed by authorized representatives from each institution. A relationship on a project-by-project or grant-by-grant basis is not considered a formal written affiliation agreement.

### 12.B WITHDRAWING FROM 40 CFR PART 262, SUBPART K FOR THE MANAGEMENT OF HAZARDOUS WASTES IN LABORATORIES

Place an **“X”** in the **“Y”** box, if you have previously elected to opt into 40 CFR Part 262, Subpart K and are now withdrawing from participation in this optional set of alternative requirements for hazardous waste generation in laboratories. Withdrawing generators will automatically revert to regulation under 40 CFR

262.15 requirements (or 40 CFR 262.14 for VSQGs). If marking “Y” for this box, please include comments in Item 18 – Comments that explain your reasons for withdrawing from Subpart K. Otherwise, **place an “X” in the “N” box.**

### ITEM 13 – EPISODIC GENERATION

**Place an “X” in the “Y” box**, if you are a VSQG or SQG notifying that you are taking advantage of the episodic generator event provision in 40 CFR 262.232. This provision allows a VSQG or an SQG to generate additional quantities of hazardous waste—temporarily exceeding its normal generator category limits—and still maintain its existing generator category, provided it complies with the specified conditions identified in 40 CFR 262.232 (a) and (b). Otherwise, **place an “X” in the “N” box.**

**NOTE** If you mark “Y,” you must fill out the Addendum to the Site ID Form: Episodic Generator.

The generator may use this provision once per calendar year with the ability to petition for a second event. However, if the first event is planned, the petition must be for a second event that is unplanned, or vice-versa. It is recommended you review the regulation at 40 CFR 262.233 to understand what is required of a generator should you choose to take advantage of this petition process.

Although not inclusive, examples of planned episodic events include tank cleanouts, short-term construction projects, short-term site remediation, equipment maintenance during plant shutdowns, removal of excess chemical inventories, and site and production process decommissions by a new operator. Unplanned episodic events, which EPA expects would be less frequent, include production process upsets, product recalls, accidental spills, or “acts of nature,” such as a tornado, hurricane, or flood. If you are taking advantage of this provision, you must complete the Addendum to the Site Identification Form for Episodic Generation. Information to be completed includes:

- the type of episodic event (i.e., planned or unplanned),
- the name and telephone number of an emergency contact at the site,
- the beginning or start date of the episodic event, and expected completion date (no later than 60 days from beginning date),
- the reason for the episodic event (event description),
- identification of the applicable federal waste codes (and state waste codes, if applicable), and
- the estimated total quantity of hazardous wastes that will be generated as a result of the episodic event.

### ITEM 14 – LQG CONSOLIDATION OF VSQG HAZARDOUS WASTE

The 2016 Hazardous Waste Generator Improvements Final Rule allows LQGs to receive and consolidate hazardous wastes from VSQGs if the VSQGs are under the control of the same “person” as defined in 40 CFR 260.10.

**NOTE**

“Control,” for the purposes of this section, means the power to direct the policies of the generator, whether by the ownership of stock, voting rights, or otherwise. Contractors who operate generator facilities on behalf of a different person as defined in 40 CFR 260.10 are not be deemed to “control” such generators.

If you **mark “Y,”** you must fill out the Addendum to the Site ID Form: LQG Consolidation of VSQG Hazardous Waste.

**Place an “X” in the “Y” box,** if you are an LQG taking advantage of the provision found at 40 CFR 262.17 (f), you must notify (or re-notify) EPA or your authorized State. Otherwise, **place an “X” in the “N” box.** Information to be completed for each VSQG you are receiving hazardous waste from including:

- EPA Identification number (if applicable),
- the site name,
- address,
- contact name, and
- telephone number.

#### ITEM 15 – NOTIFICATION OF LQG SITE CLOSURE FOR A CENTRAL ACCUMULATION AREA (CAA) OR ENTIRE FACILITY

The 2016 Hazardous Waste Generator Improvements Final Rule requires LQGs to notify EPA no later than 30 days prior to closing their facility. They must also notify EPA within 90 days after closing the facility and having complied with the closure performance standards of 40 CFR 262.17 (a)(8) (iii) or 40 CFR 262.17 (a)(8)(iv), or notify EPA that they cannot meet the closure performance standards. Optionally, an LQG may notify that they are closing a central accumulation area.

**Place an “X” in the “Y” box,** then **complete the appropriate boxes: 15.A – D.** Otherwise, **place an “X” in the “N” box.**

##### 15.1 CENTRAL ACCUMULATION AREA (CAA) OR ENTIRE FACILITY

Indicate if you are closing a central accumulation area or are closing the entire facility.

##### 15.2 EXPECTED CLOSURE DATE

Provide the date (mm/dd/yyyy) that you expect to close the CAA or the entire facility.

##### 15.3 REQUESTING NEW CLOSURE DATE

If you cannot complete the closure of your facility (or central accumulation area) within 90 days of starting the closure process, indicate the new closure date (mm/dd/yyyy). Explain in Item 18 - Comment why you are requesting the additional time.

**15.4 DATE CLOSED**

Provide the date (mm/dd/yyyy) that the facility or CAA closed.

**a. In compliance with the closure performance standards 40 CFR 262.17(a)(8):**

Indicate if the facility or CAA closed in compliance with the closure performance standards in 40 CFR 262.17(a)(8).

**b. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8):**

Indicate if the facility or CAA closed but failed to meet closure performance standards in 40 CFR 262.17(a)(8).

**ITEM 16 – NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL (HSM) ACTIVITY****NOTE**

40 CFR 260.42 must be in effect in your State in order to manage hazardous secondary material under these regulations.

**Place an “X” in the “Y” box** if you are notifying under 40 CFR 260.42 that you will begin managing, are still managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27). Otherwise, **place an “X” in the “N” box**.

**NOTE**

If you mark “Y,” you must fill out the Addendum to the Site ID Form: Notification of Hazardous Secondary Material Activity.

**ITEM 17 – ELECTRONIC MANIFEST BROKER**

**Place an “X” in the “Y” box** if you are a person as defined in 40 CFR 260.10 that elects to use the electronic manifest system to obtain, complete and transmit an electronic manifest format supplied by the EPA electronic manifest system under a contractual relationship with a hazardous waste generator. Otherwise, **place an “X” in the “N” box**.

**ITEM 18 – COMMENTS**

Use this section as needed to provide additional information for Items 1 through 17. Include the item number and box letter (if any) for each comment you make. You may attach additional sheets if needed. Remember to include your EPA Identification Number on the top of each page.

**ITEM 19 – CERTIFICATION**

This certification must be signed and dated by the generator(s), owner(s), operator(s), or authorized representative(s) of the site. See 40 CFR 270.11 for more information on signatories in general. An “authorized representative” is a person responsible for the overall operation of the site or an operational unit (i.e., a plant manager or superintendent, or a person of equivalent responsibility). To qualify as an “authorized representative,” generator, owner, operator, or responsible official must submit a written authorization to the Director in an authorized state or the EPA Regional Director in non-authorized states.

**NOTE**

All Site ID Form submissions must include this certification to be complete.