FINAL 06-19-00

2001 HAZARDOUS WASTE REPORT (Biennial Report), PART A PERMIT APPLICATION, and NOTIFICATION of REGULATED WASTE ACTIVITY INFORMATION COLLECTION REQUEST

BACKGROUND DOCUMENT

June 21, 2000

Acknowledgments

This document was prepared by the WIN/INFORMED Program System Design ICR Reliant System Change team. We would like to thank the following **WIN/INFORMED** individuals for their help with developing this document:

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BACKGROUND

Introduction

The WIN/INFORMED initiative was established jointly by the States and the Environmental Protection Agency (EPA). WIN stands for Waste Information Needs and derives from planning work undertaken by the EPA. INFORMED stands for Information Needs for Making Environmental Decisions and derives from the State planning work.

The objective of this initiative is to reassess the information needs of the Hazardous Waste Management Program operating under Subtitle C of the Resource Conservation and Recovery Act (RCRA). With WIN/INFORMED, the EPA and the States aim to jointly identify, and share where appropriate, the information needed to effectively manage the RCRA Program.

The goals of WIN/INFORMED are to: 1. Streamline how we collect, use, and manage hazardous waste information, at the national level; 2. make that information readily available to the States, EPA, Tribes, and the public; and 3. support the effective implementation of the Hazardous Waste Program.

To achieve these goals, the WIN/INFORMED initiative employs a structured approach called the Information Engineering Methodology (IEM) to plan, analyze, design, and implement information management systems to support the RCRA Program. Each phase will consist of a number of inter-dependent projects; structured to allow constant progress towards the objectives without the risks associated with a very large-scale redevelopment effort. This full life-cycle methodology facilitates developing complex, enterprise-wide information systems, particularly those that require a high degree of data sharing.

Implementing the RCRA Program is complex, requiring multiple organizations to share large amounts of information. By applying IEM principles to break down the program's complexity into a number of discrete "program areas," the WIN/INFORMED initiative can focus attention and resources effectively.

Project Background

The States and the EPA conducted separate *planning* projects to broadly document their own information needs. Completed in late 1996, these efforts resulted in two Information Strategy Plans (ISPs), both of which identified priority improvements needed for the information collection and management systems used to support program implementation.

An ISP identifies logical groupings of program functions and information needs, referred to as "program areas." The strategic planning for the WIN/INFORMED initiative divided the RCRA Program into five program areas. They are:

- Universe Identification (UID)

- Waste Activity Monitoring (WAM)

- Handler Monitoring and Assistance (HMA)

- Permitting and Corrective Action (PCA)

- Program Evaluation (PE)

A summary of the EPA WIN ISP and State Informed ISP is available at the following web site: http://www.epa.gov/epaoswer/hazwaste/data/win/index.htm

The States and the EPA agreed to form a partnership to conduct the above mentioned phases of the WIN/INFORMED Initiative for the five program areas. Each program area will be beginning with the analysis of that program area.

UID WAM Program Area Analysis Project

The purpose of the Program Area Analysis (PAA) is to understand the program's needs for information, consider how well those needs are supported by existing systems, and identify improvements.

The Universe Identification (UID) PAA began in October 1998, and the project's preliminary findings and recommendations were presented for review by selected program experts during March 1999. In January 1999, the WIN/INFORMED Executive Steering Committee asked the UID PAA Team to begin analyzing the Waste Activity Monitoring (WAM) Program area in tandum with the UID Program area. This strategy effectively realized significant time and cost savings by combining the national review and later systems implementation planning stages of these closely related projects. Analysis of the WAM Program area began in February 1999, with the project's preliminary findings and recommendations presented for review by selected program experts during June 1999. After completing this review, the UID and WAM analysis projects were combined.

During September and October of 1999, the preliminary findings and recommendations from both projects were refined and presented in the form of a Draft Report for national review by all of the States, Territories, the EPA Regional Offices, and the EPA Offices of Solid Waste and Enforcement and Compliance Assistance. Subsequently, the project findings were updated to reflect input from reviewers. A plan was also developed to guide the design and implementation of the recommendations from the project.

The WIN/INFORMED Executive Steering Committee approved the recommendations and initial stages of the implementation plan in December 1999.

The Final Report presents the PAA project's confirmed recommendations for future RCRA Program information management, together with an implementation plan. This report is available at the EPA's or Association of State and Territorial Solid Waste Management Officials (ASTSWMO's) web site; the addresses are:

http://www.epa.gov/epaoswer/hazwaste/data/win/r00-004.pdf ; and
www.astswmo.org.

The report presents the PAA Team's findings, in three main project deliverables:

o Information Needs The information that must be made available to successfully implement the RCRA Program.

o Recommended Improvements The changes to current information collection and management procedures that are necessary to meet the required information needs.

o Implementation Plan An outline for how these recommendations should be organized and further designed and implemented. This plan aggregates related recommendations together to define the scope of a number of discrete design projects.

The following list summarizes the four different design and implementation projects to be undertaken relative to the UID/WAM Program Area Analysis recommendations for improvements to the current RCRA Program information collection and management procedures.

Project 1: Information Collection Request (ICR) Reliant System Changes

This project will design the policies/procedures, reporting mechanisms, and information system changes required by those PAA recommendations that require ICR changes, with the exception of two major recommendations to be considered as part of Project 2 described below. Once design tasks are complete, the ICR changes will be published and automated system changes will be implemented. These are the recommendations that this background paper discusses.

Project 2: Site Verification and Treatment, Storage, Disposal Facility (TSDF) Electronic Reporting

This project will study the feasibility of two major changes to current RCRA information management practices. The first study will consider the alternative mechanisms by which identification data can be verified by RCRA sites. The project will estimate the cost and burden imposed upon the regulated community and RCRA implementers. The second study will consider the feasibility of the electronic reporting of waste receipt data from the nation's TSDFs. This would include the evaluation and design of the reporting mechanism, a national repository and State/EPA data interchange mechanisms, and the pre-population of generators' biennial hazardous waste reports.

Following the feasibility studies, a national review will be conducted to confirm the recommended direction. The solution will then be forwarded to the WIN/INFORMED Executive Steering Committee for direction on design, approval, and implementation, including all associated business process and automated system changes.

Project 3: Data Integration into RCRAInfo

This project will determine how the data and functionality included in RCRAInfo for RCRA site identification and waste-monitoring information should be integrated and modified to provide a single source. Once the integration has been designed, the necessary automated system changes will be implemented.

Project 4: Implement New Guidance

This project will design the policy/procedural changes for the recommendations that do not directly affect the current reporting mechanisms. Once the guidance has been designed, new guidance documents and training materials will be developed and distributed to RCRA regulators to facilitate the implementation of the relevant recommendations.

CHANGES TO DATA COLLECTION FORMS

Universe Identification (UID) and Waste Activity Monitoring (WAM) Program System Design Projects

The *Program System Design (PSD)* describes how the existing systems should change to effect improvement recommendations identified by the program area analysis. It also provides an understanding of the costs and effort involved in implementing program changes. One of the key *design* tasks is to make the changes to data collection forms proposed by the recommendations.

The States and the EPA are currently working together on design projects that include Project 1: Information Collection Request (ICR) Reliant System Changes. This project is designing the policies/procedures, reporting mechanisms, and information system changes for the UID/WAM recommendations that require ICR changes. The following discussion describes the ICR Reliant System Changes project, and specifically provides a discussion of the proposed changes to forms and instructions for the following:

- o Hazardous Waste Report (Biennial Report) (EPA Form 8700-13 A/B)
  - Identification and Certification – Form IC
  - Waste Generation and Management – Form GM
  - Waste Received from Off-Site – Form WR
  - Off-Site Identification - Form OI;
- o Notification of Regulated Waste Activity (EPA Form 8700-12); and
- o RCRA Part A Permit Application (EPA Form 8700-23).

Biennial Report, Site Identification, and Part A Data Collection Form Changes

This discussion describes the design changes to the above mentioned forms and instructions. Each form needs revising to include the changes proposed by the recommendations. We are appropiately combining and restructuring forms. We will incorporate recommendations requiring addition of fields, or removing nonessential fields from appropriate sections. Each forms instructions will be updated to reflect changes to reporting schedules or the regulated universe and to reflect any revised definitions for data elements collected on the forms. This discussion describes the changes to the content of the forms and instructions. We will be developing the formating of the forms later this year. Changes to existing business procedures for improvements and training plans will be developed later this summer.

We first present a summary list of the recommendations, followed by a description of the form changes proposed for each recommendation to existing form fields (i.e., the spaces where reporters enter data) and associated instructions. Form changes are being considered for the Hazardous Waste Report, Notification of Regulated Waste Activity, and the RCRA Part A Permit Application.

The following list summarizes each of the UID/WAM PAA Recommendations covered by this ICR Renewal Notice. The numbering of the recommendations matches that used in the PAA Final report. Complete descriptions and program area analysis can be found in the UID/WAM PAA Final Report, available at the following web sites:
http://www.epa.gov/epaoswer/hazwaste/data/win/r00-004.pdf ; and
www.astswmo.org.

Summary List of Recommendations Being Proposed

6) Collect both state and federal generator status from states
In addition to reporting the federal generator status for a RCRA site to the EPA, each state with regulations that are "more stringent than" or "broader in scope" than the federal requirements will also provide the state generator status if different from the federal status. This information will be made available nationally for all generators.

7) Merge common elements of current site identification forms
Reconcile the similar but different instructions and data fields on the Notification of Regulated Waste Activity, Hazardous Waste Report - Form IC, and the RCRA Part A Permit Application. Develop and implement a single information collection form to record basic site information.

8) Add additional data elements to Notification Form
Include additional data fields on the Notification of Regulated Waste Activity Form to capture new nationally required information needs.

9) Provide for standard notification by large quantity handlers of universal wastes
Revise, in a consistent manner, the Notification of Regulated Waste Activity Form to collect information about the activities of large quantity handlers of universal waste.

13) Tracking hazardous waste exports
Make waste export data collected and tracked by the EPA Office of Enforcement and Compliance Assurance available to RCRA Program users in national RCRA Program information systems. Biennial Report instructions will be modified to clearly indicate that waste exports should not be reported.

14) Tracking imports of hazardous wastes
An importer of hazardous waste will complete the Form GM and use the appropriate code to identify that the waste was imported from a foreign country.

15) Clarify types of hazardous wastes to be reported
The Biennial Report requirements will be changed so that generators only report hazardous wastes used in determination of their generator status. This includes wastes that are generated, accumulated and subsequently managed on-site, or shipped off-site.

16) Streamline Source, Origin, Form, and Management Codes
The following three recommendations will be implemented to streamline and improve the usefulness of reported waste information:
1) Current Source codes will be consolidated, regrouped, and merged with the current Origin codes to provide a simpler coding structure.
2) Form codes will be revised resulting in a reduction of codes.
3) Management Method codes will be revised to eliminate overlap with Form codes.

17) Remove data elements from Biennial Reporting Forms
Several data fields currently collected on the Biennial Reporting Forms are to be removed.

21) Determine location coordinates for a RCRA Site
Provide address-matching capability in national information systems to determine accurate geographic location information from the location address.

25) Make Source of waste a mandatory data element
Require the collection of Source code for reported wastes.

Recommendations - Form Changes

Each issue paper for the recommendations provides the following:

Background	describes the underlying RCRA Program need.
Recommendation	describes the PAA Team's recommendation.
Recommended Form Amendment	describes the changes or additions/deletions to existing forms and instructions.

The issue papers/recommendations that follow are organized into two groups. The first group includes those recommendations that affect the site identification information currently collected on the Hazardous Waste Report (Biennial Report) Identification and Certification Form (Form IC), the Notification of Regulated Waste Activity Form, and the RCRA Part A Permit Application Form. The second group aggregates those recommendations primarily affecting the waste activity information included in the Biennial Report forms for Waste Generation and Management (Form GM) and Waste Received from Off-Site (Form WR). The recommendations complement one another.

We also want to identify that an important result of the PAA work is the internal dependencies of these recommendations upon each other. The recommendations as presented here are in agreement with the states and the EPA dependency findings from the Program Area Analysis work.

6) COLLECT BOTH STATE AND FEDERAL GENERATOR STATUS

Background

The basic federal RCRA regulatory framework provides for three distinct classes of hazardous waste generators: 1. large quantity generator of hazardous waste (LQGs), who are subject to the most comprehensive regulations; 2. small quantity generators of hazardous waste (SQGs), who comply with a less stringent set of requirements; and 3. conditionally exempt small quantity generators of hazardous waste (CESQGs), who are not subject to reporting requirements provided they comply with a set of simple requirements. Generators fall into these regulated classes based on the volume and toxicity of hazardous waste they generate, accumulate and/or store in any one-month of the calendar year. Both LQGs and SQGs are required to notify EPA of their activities, declare their generator category, and obtain Environmental Protection Agency (EPA) identification numbers by submitting the Notification of Regulated Waste Activity (EPA Form 8700-12). The EPA ID numbers are used in manifesting and other waste reporting (for example the Hazardous Waste Report, also called the Biennial Report; EPA Form 8700-13 A/B).

While the Resource Conservation and Recovery Act, Subtitle C (RCRA) requires as a condition of authorization that state hazardous waste laws be at least as stringent as federal rules, it allows states to operate regulatory programs that are broader in scope (BIS) or more stringent than (MST) the federal program. For example, a state:

- May impose the regulatory obligations of an LQG on facilities generating less than 1,000 kilograms of hazardous waste in a calendar month (which is more stringent than the federal scheme).
- May regulate wastes not included in the federal list of hazardous wastes (broader in scope).
- May require CESQGs to notify and obtain an EPA identification number (also broader in scope).

This flexibility reflects both the essence of the state-federal system of government and the varying situations, concerns, and needs of different states.

States need to know the status of a generator as defined by their own regulations, which may or may not be the same as the federal regulations. Where state definitions are different from federal definitions, the states have less need for the federal status.

The EPA uses the federally defined generator status to support many of the agency's program evaluation functions, including various regulatory oversight activities, regulatory impact assessment, fund allocation, and congressional reporting. The federal LQG and SQG universe sizes are also used to identify compliance rates, high-risk generator sectors, and facilities that need to be inspected. Since states have varying definitions of large and small quantity generators, the federal definition must be used to ensure consistency and to report meaningful universe numbers when performing interstate comparison analysis.

Recommendation

States will report their generator universe as identified by their own regulatory definitions, and will also report the generator universe as identified by the federal regulatory definition to the best of their ability to translate the generator status. This reporting will occur for all generators that are required to report nationally.

The federally defined generator status should be determined by the state, using information extrapolated from waste generation information provided on the Biennial Reporting Forms, or equivalents, when it becomes available, or with information collected directly from the regulated community.

For those states having MST or BIS regulations that affect the generator status, the following steps are proposed:

1) When a generator notifies, the state will assume that the reported generator status reflects solely the state

regulations unless the state collects sufficient information to determine both federal and state status using a state-specific Notification Form.

2) Periodic waste reports (manifests, Biennial Reporting Forms, or similar) will be used to confirm state and federal status values. LQG status values may be determined directly from waste generation information while SQG and CESQG status values can be determined either directly, if they submit waste reports, or by examination of waste receipt information submitted by TSDFs.

Precise determination of the federal status may not always be possible. The best approximation is acceptable in these cases.

This recommendation will provide the following benefits:

- Having the state defined status values in the national database will provide a more complete picture of the total number of handlers regulated under RCRA regulations across the country.

- Data will be more directly comparable across the nation, resolving many of the problems of having different universe numbers between the EPA and the states.

- A single approach will be used to determine the national universe of federally regulated generators instead of the varying state-by-state practices.

- EPA inspectors would be able to more accurately determine which regulations apply at a given generator.

- EPA could determine impact of federal rules, both as written and as applied (includes federal requirement and states more stringent than requirement) .

Recommended Form Amendments

Form Revisions
The Biennial Report and Notification forms will not being changed.

Instruction Revisions
Notification of Regulated Waste Activity Booklet (December 1999)
Page 7, Section I, How to Determine if you Handle a Regulated Hazardous Waste

Add a new paragraph at the end of this section stating:
Many states have requirements that vary from the federal regulations. These state regulations may be more strict than the federal requirements by identifying additional wastes as hazardous, or may not yet include all wastes currently regulated under RCRA. It is your responsibility to comply with all regulations that apply to you. For more information on state requirements, you are strongly urged to contact the appropriate addressee listed for your state in Table 1 of these instructions. An insert may be included with this booklet that identifies your state as having more stringent requirements, along with a contact to answer your questions.

In addition, available state web site addresses that provide additional information will be added to Table 1.

Page 11, Section IV, C, Where Should I Send My Completed Form?
The current instructions to “C” will be modified to add “state web site information where available.. . .”

Page 15-22, Table 1, Alphabetized State Listing of Contacts for . . .
The web site address, where available, will be added to each state’s information.

Notice/instructions to state authorized agencies
Notice and instructions will be provided to state authorized agencies informing them of the change in collection of generator status information as part of the their Biennial Report process. The instructions will also cover reporting generator status information for SQGs and CESQGs through their normal notification process. The generator status instructions will not require changes to the Biennial Report or Notification forms.

The instructions will also include a suggestion that states with MST/BIS provisions include an addendum to the Notification booklet that provides instructions on their state's MST/BIS provisions.

7) MERGE COMMON ELEMENTS OF CURRENT SITE IDENTIFICATION

Background

Implementation of the Resource Conservation and Recovery Act, Subtitle C (RCRA) program requires collecting basic information about sites and the hazardous waste handling activities taking place their. This information is used for waste activity monitoring, compliance monitoring, technical assistance, program planning, waste minimization, and other program activities. There is an increasing need to streamline and enhance the existing information collection process to reduce burden and improve the quality of data collected.

Analysis shows that site identification data is currently collected on several different forms using differing instructions and differing definitions for key information needs. This can lead to variations in the information submitted for a site. Basic site information is collected from all regulated RCRA facilities on the Notification of Regulated Waste Activity Form (8700-12). Large quantity generators of hazardous waste (LQGs) and treatment, storage, and disposal facilities (TSDFs) report site information on the Hazardous Waste Report (Biennial Report; 8700-13A/B) Identification and Certification Form (Form IC). Facilities that treat, store or dispose of hazardous waste need to submit site information on the RCRA Part A Permit Application Form (8700-23) to obtain a permit from the relevant implementer organization. Although the Part A Permit Application Form also collects process specific information, most of the data elements collected on the three different forms that provide basic site information are essentially duplicative.

We also want to make the readers aware that the UID/WAM Program Area Analysis Final Report includes a recommendation for removing hazardous waste codes from the Notification form (Recommendation 10), once the associated recommendation to gather waste activity information by means of frequent electronic reporting by TSDF's is implemented. These TSDF reports would provide waste activity information about the wastes they receive from sites. We are currently studying the feasibility of electronic reporting of this TSDF data on a national basis. This includes an evaluation of the reporting mechanism, a national repository, and data interchange mechanisms.

Recommendation

Create a new RCRA, Subtitle C, Site Identification Form (hereafter Site Identification Form) that will harmonize the site profile information that is currently collected on the:

Hazardous Waste Report (Biennial Report; EPA Form 8700-13 A/B) Identification and Certification Form - IC Form.
Notification of Regulated Waste Activity (EPA Form 8700-12).
RCRA Part A Permit Application (EPA Form 8700-23).

The Site Identification Form will replace the site identification data portions (see the table below) for the following:

- In the Biennial Report replace the Identification Certification Form (Form IC).
- In the Notification of Regulated Waste Activity booklet replace most of the current form (except waste code information). And
- In the Hazardous Waste Permit Application Part A replace the site identification part of the current form; all the process-specific information will entered on a seperate form in the booklet.

The Site Identification Form would be submitted as a component of each information collections requirement along with the any other forms as appropriate. Owners/operators would, therefore, continue to submit the

information with the same frequency as they currently do, but would only need to be familiar with one set of instructions and data fields.
A copy of the completed Site Identification form as submitted for Notification would be sufficient for submission as a component of a Part A Application or a Biennial Report. Reporters will only need to correct or update any of the site identification information that may have changed; they would not need to complete an entirely new RCRA Site Identification Form.

Recommended Form Amendments

Form Revisions

The following is a listing of site identification information that will be included on the form and the current data field name on the three aforementioned forms.

The shaded data fields will no longer be collected as per the Universe Identification PAA Final Report recommendations (see Table 2 in the final WIN/Informed UID & WAM PAA report).

	Recommended RCRA Site Identification Form	*Notification of Regulated Waste Activity (EPA Form 8700-12)*	*RCRA Part A Permit Application (EPA Form 8700-23)*	*Hazardous Waste Report (Biennial Report) Identification and Certification - Form IC (EPA Form 8700-13 A/B)*
Name	*name of site*	*name of installation*	*name of facility*	*site/company name*
Number	*site EPA id number*	*installations EPA id number*	*EPA id number*	*EPA id number*
Location address line 1	*location of site – street name and number*	*location of installation – street*	*facility location – street*	*location address – street name and number*
location address line 2	*location of site – street name and number*	*location of installation – street (cont)*	*facility location – street (cont)*	*location address – street name and number*
location address city name	*location of site – city, town, village*	*location of installation – city or town*	*facility location – city or town*	*location address – city, town, village*
location address state name	*location of site – state*	*location of installation – state*	*facility location – state*	*location address – state*
location address zip code	*location of site – zip code*	*location of installation – zip code*	*facility location – zip code*	*location address – zip code*
location address county name	*location of site – county name*	*location of installation – county name*	*facility location – county name*	*county*

mailing address line 1	*site mailing address – street or PO box*	*installation mailing address – street or PO box*	*facility mailing address – street or PO box*	*mailing address – number and street name*
mailing address line 2	*site mailing address – street or PO box*		*facility mailing address – street or PO box*	*mailing address –number and street name*
mailing address city name	*site mailing address – city, town, village*	*installation mailing address – city or town*	*facility mailing address – city or town*	*mailing address – city, town, village*
mailing address state name	*site mailing address – state*	*installation mailing address – state*	*facility mailing address –state*	*mailing address – state*
mailing address zip code	*site mailing address – zip code*	*installation mailing address – zip code*	*facility mailing address – zip code*	*mailing address – zip code*
land owner type	*land owner type for the site*	*land type*	*land type*	
type	*hazardous waste activity - greater than 1000kg/mo or equivalent state status*	*hazardous waste activity - greater than 1000kg/mo*		*RCRA generator status – LQG*
	hazardous waste activity – 100 to 1000kg/mo or equivalent state status	*hazardous waste activity – 100 to 1000kg/mo*		*RCRA generator status – SQG*
	hazardous waste activity – less than 100kg/mo or equivalent state status	*hazardous waste activity – less than 100kg/mo*		*RCRA generator status – CESQG*
				RCRA generator status – non-generator
	hazardous waste activity – treater, storer, disposer or equivalent state status	*hazardous waste activity – treater, storer, disposer*		*storage subject to RCRA permitting regulations*
				treatment, disposal or recycling subject to RCRA permitting regulations

			exempt boiler and/or industrial furnace – *a. smelting, melting, and refining furnace exemption* *b. small quantity on-site burner exemption*		
hazardous waste fuel marketer					
underground injection			*Underground injection*		
used oil transporter			*used oil transporter*		
used oil transfer facility			*used oil transfer facility*		
used oil processor			*used oil processor*		
used oil re-refiner			*used oil re-refiner*		
off-specification used oil burner			*off-specification used oil burner*		
used oil fuel marketer			*used oil fuel marketer who directs shipment of off-specification used oil to used oil burner*		
			used oil fuel marketer who first claims the used oil meets the specifications		
large quantity handler of universal waste			*large quantity handler of universal waste*		
type	*generate*	*accumulate over 5000kg*			
batteries					
pesticides					
thermostats					
lamps					

	other _____ _____ _____				
	universal waste destination facility				
	Listed hazardous Waste		*Listed hazardous Waste*		
	Characteristics of Nonlisted Hazardous Wastes		*Characteristics of Nonlisted Hazardous Wastes*		
	Other Wastes		*Other Wastes*		
	importer				
	mixed radioactive waste handler				
	hazardous waste transporter		*hazardous waste activity – transporter-for own waste only or equivalent state status*		
			hazardous waste activity - transporter – for commercial purposes or equivalent state status		
			mode of transportation - air, rail, highway, water, or other - specify		
NAICS code	*site NAICS code*			*NAICS code (four)*	*[currently on GM Form and not IC Form - SIC code]*
	1				
	2				
	3				
	4				
site contact	*site contact – first name*		*installation*	*facility contact –*	*contact – first*

full name		*contact – first name*	*first name*	*name*
	site contact – last name	*installation contact – last name*	*facility contact –last name*	*contact – last name*
	site contact – middle initial	*installation contact -*	*facility contact -*	*contact – middle initial*
site contact title		*installation contact – job title*	*facility contact –title*	*contact – title*
site contact phone number	*site contact – telephone number*	*installation contact – phone number*	*facility contact –phone number*	*contact – telephone number*
site contact mailing address line 1		*installation contact – address (mailing) – street or PO box*	*facility contact address (mailing) – street or PO box*	
site contact mailing address line 2		*installation contact - address (mailing) – street or PO box*	*facility contact address (mailing) – street or PO box*	
site contact mailing address city name		*installation contact - address (mailing) – city or town*	*facility contact address (mailing) – city or town*	
site contact mailing address state name		*installation contact - address (mailing) – state*	*facility contact address (mailing) – state*	
site contact mailing address zip code		*installation contact - address (mailing) – zip code*	*facility contact address (mailing) – zip code*	
owner name	*site name of legal owner*	*ownership - installation legal owner*	*facility owner – name of facility's legal owner*	
owner type	*type owner type*	*ownership – owner type*	*facility owner – owner type*	
operator name	*site name of operator*		*operator information – name of operator*	
operator type	*site operator type*		*operator information - operator type*	
signature (s)		*262.12 no longer references 270.11*	*owner(s) and operator(s) (as specified in 270.11)*	*ask for person completing form (does not reference 270.11)*
signatory's name	*last name, first name and middle initial*	*name*	*(see owner & operator name)*	*last name, first name and m.i..*
signatory's		*official title*	*Name & Official*	*title*

title			*Title*	
date signed (notifica-tion date)	*date signed*	*date signed*		
certificatio n statement	*use certification statement in notification of regulated waste activity*	*see below*	*see below*	*see below*

We are proposing to use the current certification statement for Notification of Hazardous Waste Activity Form (8700-12) described below, for the new RCRA Site Identification Form. This certification will also become the certification for the Hazardous Waste Report (Biennial Report) because the new Site Identification Form will replace the current IC Form - Identification and Certification.

Certification statement for Notification of Regulated Waste Activity (EPA Form 8700-12):

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certification statement for Hazardous Waste Report (Biennial Report) Identification and Certification is provided here for reference - IC Form (EPA Form 8700-13 A/B:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certification statement for the RCRA Part A Permit Application is provided here for reference (EPA Form 8700-23):

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The Hazardous Waste Permit Application Part A Form (8700-23) will continue to contain the following process-specific information listed below. The new Site Identification Form will be used in conjunction with a revised Hazardous Waste Permit Application Part A Form.

Other environmental permits (page 2 of 7)

- permit type
- permit number
- description

Nature of business (brief description) (page 3 of 7)
Process codes and design capabilities (page 4 of 7)
- process code
- process design capacity amount
- process design capacity unit of measure
- process total number of units

Other processes (page 4 of 7)
- process code
- process design capacity amount
- process design capacity unit of measure
- process total number of units

Description of hazardous wastes (pages 6 of 7 and 8 of 7)
- EPA hazardous waste number
- estimated annual quantity of waste
- unit of measure
- process codes
- process description

8) Add Additional Data Elements to Notification Form

Background

Note: This item recommends that the following be included on the form in the Notification of Regulated Waste Activity (EPA Form 8700-12) to capture new, nationally required information needs. Recommendation #7- "Merge common elements of current site identification forms" is also being submitted at this time. The discussion below references additions to the instructions in the Notification booklet; the submitter would enter the required data on the new Resource Conservation and Recovery Act, Subtitle C, (RCRA) Site Identification Form, which would be included in the booklet.

Recommendation

These data elements would be added for all RCRA sites:

1) North American Industrial Classification System (NAICS) codes for industrial activity information.
2) Operator information in addition to the currently collected owner information. This would be the same information now collected for Treatment, Storage, Disposal Facility's (TSDFs) on the RCRA Part A Permit application.
3) Mixed waste (hazardous and radioactive) generated under hazardous waste activities.
4) United States Importer for hazardous waste activities.

Each data element is presented separately below.

Recommended Form Amendments

Form Revisions
Notification of Regulated Waste Activity Booklet, December 1999

1. North American Industrial Classification System (NAICS) Codes

Revise the Site Identification Form by adding a new section in the Notification instructions and data elements on the form to collect the NAICS code.

Note: We are removing the Standard Industrial Classification (SIC) Code from the Hazardous Waste Report - Generation and Management Form (Form GM).

The SIC codes were replaced with NAICS codes in the December 1999 revision to the RCRA Part A Permit Application (EPA Form 8700-23). The NAICS will be removed from the Part A Form in Section IX; the timing for this deletion is dependent on merging the site identification information into one form. This section would be added after Section VIII. Ownership (currently numbered VII; see #2 below) subsequent sections would be re-numbered. This change will allow for up to four codes to be entered, and these classifications may differ from the NAICS codes describing the operation generating the hazardous wastes.

The Notification instructions section would read:

Item IX- NAICS Codes:

List, in descending order of hazardous waste activity significance, the North American Industry Classification System (NAICS) codes that best describe your facility in terms of the principal products or services you produce or provide. Enter each 5 or 6-digit NAICS code starting in the left most box. If you

use a 5-digit code, leave the sixth box blank. These classifications may differ from the NAICS codes describing the operation generating the hazardous wastes.

2. Operator information

Include operator information on the Site Notification Form. This is information now collected for TSDFs on the RCRA Part A Permit Application. This section would be added in the Notification instructions before the current Section VII. Ownership; subsequent sections would be re-numbered.

Item VII - Operator Information:

A. Name: Give the name, as it is legally referred to, of the person, firm, public organization, or any other entity which operates the facility described in this notification. This may or may not be the same name as the facility. The operator of the facility is the legal entity that controls the facility's operation rather than the plant or site manager. Do not use a colloquial name.

B. Operator Type: Using the codes listed below, indicate in VII. B. the code which *best describes* the legal status of the current operator of the facility:

F = Federal
S = State
I = Indian
P = Private
C = County
M = Municipal*
D = District
O = Other

* *If the Operator Type is **best described** as Indian, County, or District, please use those codes. Otherwise, use Municipal.*

C. Change of Operator Indicator:

Note: *If this is your facility's first submission of a notification, leave VII. C. blank and skip to Item VIII. If this is a revised notification submission, complete Item VII. C. as directed below.*

If the operator of this facility has changed since the facility's previous notification was submitted, place an "X" in the box marked "Yes" and enter the date the operator changed.

If the operator of this facility has not changed since the facility's previous notification was submitted, place an "X" in the box marked "No" and skip to Item VIII.

If any additional operators have been added or replaced since the facility's previous notification was submitted, place an "X" in the box marked "Yes." Use the comment section to list any additional operators, the dates they became operators, and which operator(s) (if any) they replaced. If necessary, attach a separate sheet of paper.

3. Mixed waste generator

Remove the Mixed Waste Generator box from the Hazardous Waste Report – Generation and Management (GM) Form and the Waste Received from Off-Site (WR) Form.

Add mixed waste generator to the Site Identification Form. A Mixed Waste Generator check box will be added to the activities in the current Section VIII., Type of Regulated Waste Activity, A. Hazardous Waste Activity. (Note: the addition of the Mixed Waste check box on the Site Identification Form will be implemented upon approval. However, the mixed waste questions will not be removed from the Hazardous Waste Report GM Form and WR Form until the 2003-reporting year.) The new section in the instructions will reads:

Section VIII -- Type of Regulated Waste Activity:

A. **Hazardous Waste Activity**
Mark an "X" in the appropriate box(es) to show which hazardous waste activities are being conducted at this installation.

6. **Mixed waste (hazardous and radioactive) generator:** If you generate a hazardous waste that is mixed with source special nuclear or by-product material regulated under the Atomic Energy Act of 1954, mark an "X" in the box.

4. United States Importer

Add United States Importer to the new Site Identification Form under activities in the current Section VIII., Type of Regulated Waste Activity, A. Hazardous Waste Activity. The new section in the instructions will reads:

Section VIII -- Type of Regulated Waste Activity:

A. **Hazardous Waste Activity**
Mark an "X" in the appropriate box(es) to show which hazardous waste activities are being conducted at this installation.

7. United States Importer: Any person who imports hazardous waste from a foreign country into the United States, mark an "X" in the box.

This recommendation will only affect RCRA sites in the future that complete or update the Notification of Regulated Waste Activity.

9) Provide for Standard Notification for Large Quantity Handlers of Universal Wastes

Background

The WIN/Informed Program area analysis participants expressed a clear need for a better picture of universal waste handling activities to meet several needs; for example:

- Understanding how many hazardous waste generators have become solely universal waste large quantity handlers will provide a starting point to review the impacts of the universal waste program.
- Implementing agencies can, with this information, help support or take the lead on establishing collection and management (primarily recycling) systems.
- Inspection scheduling and knowing in advance the type of universal waste facilitates efficient inspections.

Note: This item recommends that the following be included on the form in the Notification of Regulated Waste Activity (EPA Form 8700-12) to capture new, nationally required information needs. Recommendation #7- "Merge common elements of current site identification forms" is also being submitted at this time. The discussion below references additions to the instructions in the Notification booklet; the submitter would enter the required data on the new Resource Conservation and Recovery Act, Subtitle C, (RCRA) Site Identification Form, which would be included in the booklet.

Recommendation

Collect information about the activities of large quantity handlers of universal waste in a consistent manner on the Site Identification Form.

Recommended Form Amendments

Instructions and Form Revisions

Include additional data elements on the Site Identification Form. to allow notifiers to indicate the type of universal waste the facility is handling and accumulating. There will be a check box for handling, accumulation, and destination for the following categories of waste: batteries (40 CFR 273.2), pesticides (40 CFR 273.3), thermostats (40 CFR 273.4), lamps (40 CFR 273.5), and other.

14) Tracking Imports of Hazardous Wastes

Background

All hazardous wastes transported into the United States must be imported through an importer, who assumes legal responsibility for the waste. There is a requirement to submit a notification to the Environmental Protection Agency (EPA) of intent to import hazardous waste from a foreign country with details about the proposed shipment (See 40 CFR 262.60). United States Importers who handle hazardous wastes currently apply for and receive an EPA identification number containing the prefix of the state in which they do business. Current information submitted in Notification of Regulated Waste Activity (EPA Form 8700-12) and the Hazardous Waste Report (EPA Form 8700-13A/B; also known as the Biennial Report) does not include a means to capture the specific activity of importing waste; therefore, importers are typically recorded as generators. This is problematic for the regulating state because it appears that the waste was physically generated within that state's boundaries. As a result, waste generation totals are artificially high for the state in question since imported waste is counted as generated waste.

The need to differentiate between domestic generation and foreign generation is important and currently hard to achieve. The treatment, storage, and disposal facilities (TSDFs) report the actual quantity of waste that they receive from generators, some of which are importers. The current TSDF reporting mechanism, however, does not provide the means to accurately determine that the waste was generated in a foreign country.

Recommendation

The Hazardous Waste Report Instructions and Forms booklet (EPA Form 8700-13A/B; also known as the Biennial Report) will be revised to require any United States importer of hazardous waste who submits a Generation and Management - GM Form to enter a code on the form that identifies the source of the hazardous waste as "imported from a foreign country." We will delete the related current instructions on the Generation and Management – GM Form, Waste Received from Off-Site – WR Form, and Off-Site Identification – OI Form. This recommendation is linked to Recommendation #8 for the addition of the regulated waste activity of United States Importer.

The imported waste can be distinguished from domestic waste by the source code listed on the Form GM by the United States Importer. Imported wastes reported on Form WR by the receiving TSD can be tracked to the importer's Form GM through the listed Off-site handler EPA ID number on Form WR.

Recommended Form Amendments

Form Revisions
The Biennial Report forms are not being changed.

Instruction Revisions
The Biennial Report instructions will be revised to require an importer filing the GM Form to enter a code in the EPA source code section of the form. There are several changes to the instructions described below.

1999 Hazardous Waste Report Instructions and Forms (EPA Form 8700-13A/B)
Page i, The instructions for "Who Must File the *[year]* Hazardous Waste Report" will be revised to include United States Importers: *The instructions are being revised to say.*

WHO MUST FILE THE *[year]* HAZARDOUS WASTE REPORT

Sites Required to File the Hazardous Waste Report

You are required by Federal statute to complete and file the *[year]* Hazardous Waste Report if your site:

- Met the definition (see box below) of a Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) of hazardous waste during *[year]*; AND/OR

- Treated, stored, or disposed of RCRA hazardous wastes on-site during *[year* ; AND/OR

NEW - Imported hazardous wastes from a foreign country and manifested or treated, stored, or disposed the hazardous wastes in the United States during *[year]*.

Page 2, **WHICH FORMS TO SUBMIT AND WHAT TO REPORT**
The instructions will be revised to say:
Form GM A separate Form GM must be submitted for **each** RCRA hazardous waste that was:

- Generated on-site and subsequently managed on-site or shipped off-site in *[year]*;
- Generated on-site in *[year]* but not managed on-site or shipped off-site until after *[year]*; or
- Generated on-site prior to *[year]* but either managed on-site or shipped off-site in *[year]*; or

NEW - Imported from a foreign country and either managed on-site or shipped off-site in *[year]*.

RCRA hazardous wastes to be reported include those that were:

- Generated on-site from a production process, service activity, or routine cleanup;
- Resulted from equipment decommissioning, spill cleanup, or remedial cleanup activity;
- Shipped off-site, including hazardous waste that was received from off-site (reported on Form WR) and subsequently shipped off-site without being treated or recycled on-site;
- Derived from the management of non-hazardous waste; or
- Derived from the on-site treatment, disposal, or recycling of previously existing hazardous waste (i.e., a residual);

NEW - Imported from a foreign country and manifested or treated, stored, or disposed in the United States.

Page 12, **WASTES TO BE REPORTED**
The Form GM instructions will be revised to say:
"Wastes To Be Reported" section , add the new line below.
NEW - Imported from a foreign country and manifested or treated, stored, or disposed in the United States.

Page 14, **Section I: Waste Characteristics - Box F:** Source code.
NOTE: The reporter will select the code from the revised Source Codes list (see Recommendation #16) that reads:

*Code #*G62 - Hazardous waste received from a foreign country (not a foreign Department of Defense site, Maquiladora, U.S. Territory or Protectorate). This site was the generator of record.

Page 19 and 20, **NOTE:**
The Form GM instructions will be revised as follows:
Delete "and from foreign countries" from the Notes on pages 19 and 20 to the instructions for the Form WR. Also delete the Definitions section in the Special Instructions on page 39 that currently reads:

Wastes shipped from foreign countries - Report on Form WR all wastes received by your facility from a foreign site that were managed on-site. If the foreign site has an EPA Identification (ID) Number, report receipts from that site just as you would report receipts from a domestic site. If the site does not have an

EPA ID Number, report the code "FC" for foreign country followed by the name of the country in the space for the EPA ID Number. Report on Form OI the name and address of all foreign generators, if this form is required by your state.

Page 39, **DEFINITIONS**
Add a new definition as it appears in the new Site Identification form instructions as proposed in Recommendation #8:

United States Importer: Any person who imports hazardous waste from a foreign country into the United States.

Page FORM OI, **OFF-SITE IDENTIFICATION, INSTRUCTIONS FOR FILLING OUT FORM OI – OFF-SITE IDENTIFICATION, ITEM-BY-ITEM INSTRUCTIONS, BOX B:** Name of off-site installation or transporter
The Form OI instructions will be revised as follows:
Revise the wording in the instructions to delete "or received from" in the last sentence. The TSD will no longer enter the name of the foreign country in the EPA ID Number field. The proper EPA ID Number should be available on the manifest as required by §262.60 (b)(1).

21) Determine Location Coordinates for a RCRA Site

Background

The increasing demand for place-based analysis is reflected in the need to specifically locate all Resource Conservation and Recovery Act, Subtitle C, (RCRA) regulated sites. The demand from implementers, the public, and other interested groups for location based information is growing. In the past, specific geographic coordinate information for a RCRA site has only been collected for treatment, storage, and disposal facilities (TSDFs). Improvements in address matching software and global positioning systems (GPS) technologies have provided increased opportunities for better locational tracking of all hazardous waste and RCRA sites.

Currently, only TSDFs seeking a permit are required to report coordinates on the RCRA Part A Permit Application (EPA Form 8700-23). The RCRAInfo data system contains these latitude and longitude values, but no information about the determination method or accuracy of these values as required by EPA's Latitude/Longitude Data Standard (November 1999).

Based on the experience of RCRA and other Environmental Protection Agency (EPA) programs, requiring facilities to report coordinates has not been a very successful way to collect accurate data. This requirement presents a significant burden, also. Owners or operators often have difficulty securing precise geographic coordinates (in degrees, minutes, and seconds). Therefore, they do not always provide accurate, uniform, and complete latitudes and longitudes for their facilities. Implementers have often found the coordinate information to be inaccurate. Some states have invested in visiting each RCRA site and using GPS units to collect high quality coordinates.

Recommendation

The EPA will no longer collect geographic information (latitude/longitude) on the Part A Permit Form. Instead, the State or EPA will determine the locational coordinates for the RCRA Site based on the site's specific location address. If it is not available, the site may be defined by a description or by geographic coordinates. Additionally, the exact point used to locate the RCRA site will be specified, for example, the map point of the address or the site centroid. Locational data for the front door of each RCRA site will provide data consistency and at the same time allow implementers flexibility for providing the data.

Locational data will be tracked for all RCRA sites. RCRA information systems will include automatic address-matching functionality to facilitate data entry by EPA and states. Implementers would be free to use other methods, e.g., GPS to obtain locational data. This option takes advantage of the current geospatial tools to obtain the coordinates for each RCRA site, based on its physical address. EPA will provide implementers the option of providing locational data at the unit level. Data fields will be added in keeping with EPA's locational data standard for method, accuracy, description (MAD) meta-data.

Recommended Form Amendments

Form Revisions

EPA will delete the latitude/longitude data element on the RCRA Part A Permit Application Form (EPA Form 8700-23) in Section III. Facility Location, C. Geographic Location and references to this information in the instructions. This will be deleted in the revision of the form after RCRAInfo has been modified to accept all the data elements of the Latitude/Longitude Data Standard (November 1999). There are no changes to the current Notification of Regulated Waste Activity or Hazardous Waste Report Forms. The data, however, will be carried for the site identification information in RCRAInfo.

EPA will also need to delete the requirement at 40 CFR 270.13(b) for owners or operators to provide the latitude and longitude for facilities on the Part A Permit Application.

Notice/ Instructions to Authorized State

Notice to state authorized agencies will be provided that describes this process. The Program System Design Team will address this process under one of its next tasks that cover design of business procedure improvements and training. State implementers will be able to enter this information for all RCRA sites if the data is in conformance with the Latitude/Longitude Data Standard (November 1999). The EPA will provide address-matching functionality in the national information systems for sites that do not have implementor specified coordinates. RCRAInfo will carry all these required data elements in the site identification data. Implementers would be free to use other sources or methods (for example, GPS) to obtain locational data; they will also have the option to provide locational data at the unit level.

13) TRACKING HAZARDOUS WASTE EXPORTS

Background

The current Hazardous Waste Export Data System (HWES) contains most data elements present on the national uniform manifests including the names, addresses, and the Environmental Protection Agency Identification Number
(EPA ID Number) of the generator (exporter), transporter(s), the designated facility (consignees) in the foreign land, U.S. Department of Transportation (DOT) shipping information, container type, number; volume, waste number, the port of exit from the United States and date of export. The required forms - either Notification of Intent to Export Hazardous Waste or the annual report of hazardous waste exports provides this information.

EPA lacks Resource Conservation and Recovery Act (RCRA) jurisdiction over foreign persons outside the United States. While EPA ID Numbers are a requirement of 40 CFR 262-279 and they are not required under the bilateral, OECD, Basel Convention, etc., agreements. Therefore, only information about management of the waste in the United States is available.

The HWES data system, is the current record/repository for export information that is required. Along with other information, the EPA ID Number is provided for the hazardous waste receiving facilities in the United States that will export the waste (United States exporter).

Recommendation

Integrate the current data in the EPA's HWES into a national Resource Conservation and Recovery Act, Subtitle C, program information system (RCRAInfo), so that states and other users can easily track hazardous waste exports.

Recommended Form Amendments

Form Revisions
No changes to Hazardous Waste Report Forms (EPA Form 8700-13A/B; Biennial Report).

Instruction Revisions
The Biennial Report Instructions are being revised as follows.

Page 2, WHICH FORMS TO SUBMIT AND WHAT TO REPORT

The 2001 Hazardous Waste Report. . . .

Form GM A separate Form GM . . ..

Radioactive wastes mixed with RCRA hazardous waste should also be reported, as well as hazardous wastes regulated only by your state (if required by your state) *The current instructions will be modified to add the following new sentence*.

DO NOT create a GM Form for hazardous waste shipped directly to a foreign country."

Page 17, **Section III: Off-site Shipment of Hazardous Waste**
Box B: EPA ID No. of facility hazardous waste was shipped to
enter the 12-digit EPA Identification Number of the facility to which the waste was shipped. *The current instructions will be modified to add.* "DO NOT create a GM Form for hazardous waste shipped directly to a foreign country."

Page 26, EXCLUDED WASTES,
Waste Category Waste Description
The current instructions will be modified to add the following new description.

Exported Waste Hazardous waste that is exported to a foreign country is not included in this report. Instead, the facility must complete an annual report as required under 40 CFR 262.56.

15) CLARIFY TYPES OF HAZARDOUS WASTES TO BE REPORTED

Background

This recommendation clarifies what hazardous wastes are to be reported in the Hazardous Waste Report (Biennial Report) (EPA Form 8700-13 A/B). In general, interim status or permitted treatment, storage and disposal facilities (TSDFs) report hazardous waste received from off-site, the management of the hazardous waste while on-site, and any shipments of hazardous waste off-site. Large quantity generators (generators), in general, report any hazardous waste generated on-site that was used to make the regulatory status quantity determination (40 CFR 261.5), hazardous wastes that are treated on-site, and hazardous waste that is shipped off-site.

The agencies that implement the Biennial Reporting System need to know the quantities and characteristics of hazardous waste generated and managed in their states, hence the regulatory requirements under Section 3002 and 3004 of the Resource Conservation and Recovery Act (RCRA) and Sections 262.41, 264.75, and 265.75 in 40 CFR. Nevertheless, 40 CFR, Parts 260 to 273, exempt specific hazardous waste and exclude distinct hazardous waste management processes from certain regulations, such as biennial reporting. The reporting of hazardous wastes that are managed in processes excluded from permitting is currently inconsistently implemented and has been a longstanding issue in the Biennial Reporting Program. Additionally, there is confusion amongst generators in determining the hazardous wastes that are to be reported on the Biennial Reporting Forms. Therefore, the purpose of this recommendation is to provide clarity and consistency in the reporting of waste activity information, specifically on the hazardous waste Generation and Management Form (GM).

Recommendation

The Biennial Reporting instructions will be changed to clarify that generators should report only the hazardous wastes which count toward the determination of their generator status (except as otherwise required by your state agency). This includes wastes that are generated, accumulated and subsequently managed on-site, or shipped off-site. TSDFs should report hazardous waste received from off-site, the management of the hazardous waste while on-site, and any shipments of hazardous waste off-site.

Recommended Form Amendments

Form Revisions

The Biennial Report Forms are being revised as follows:

FORM GM – WASTE GENERATION AND MANAGEMENT

Section II, Box C, currently contains this language: Did this site do any of the following to this waste: treat on-site, dispose on-site, recycle on-site, or discharge to a sewer/POTW? *This sentence is being revised to read:* Did this site manage hazardous waste on-site in a process that is not excluded from regulation (see Waste to be Reported on page _).

Instruction Revisions

The instructions to the Biennial Report are being modified as described below:

Page 2, WHICH FORMS TO SUBMIT AND WHAT TO REPORT

Form GM — A separate Form GM must be submitted for each hazardous waste required to be reported that was used to determine the site regulatory status and was generated, managed and/or shipped off-site in 2001.

Hazardous waste that may need to be reported include those that were:

Generated on-site . . . . *no changes*

RCRA hazardous wastes to be reported include those that were:

Generated on-site . . . . *no changes*

Radioactive wastes mixed with RCRA hazardous wastes should also be reported, as well as hazardous wastes regulated only by your state (if required by your state). - *remove portion of the sentence about radioactive mixed wastes*

Page 11, INSTRUCTIONS FOR FILLING OUT FORM GM

Page 11, WHO MUST SUBMIT THIS FORM
Revised Instructions:
A site required to file the 2001 Hazardous Waste Report must submit Form GM if, during 2001, the site generated hazardous wastes that were accumulated, managed on-site in a treatment, storage, or disposal unit, or shipped off-site. [see Waste to be Reported for any exclusions or exemptions - page _]

Page 11, PURPOSE OF THIS FORM
Revised Instructions:
Form GM summarizes on-site hazardous waste generation and management in 2001. Form GM is divided into three sections that together document the source, characteristics, and quantity of hazardous waste that must be reported; the quantity of hazardous waste managed on-site; and the quantity of hazardous waste shipped off-site for treatment, disposal, or recycling along with the off-site management method.

Page 12, WASTES TO BE REPORTED, *this heading will be revised to read*

HAZARDOUS WASTES WHICH ARE COUNTED TOWARD REGULATED STATUS

Revised Instructions:

A separate Form GM must be submitted for each hazardous waste that is required to be reported, was used to determine the site regulatory status, and was generated, managed and/or shipped off-site in 2001.

Hazardous wastes that are not counted toward your regulatory status should not be reported. These include:

- Hazardous waste exempt from regulation because the waste has not exited the raw material storage or production unit yet as specified in 40 CFR 261.4(c-f) or 40 CFR 261.5(c)(1).

-Hazardous waste that has been collected as a sample(s) for the purpose of determining its characteristic or composition, as specified in 40 CFR 261.4(d) or 40 CFR 261.5(c)(1).

- Sample(s) undergoing treatability studies, as specified in 40 CFR 261.4(e) and 40 CFR 261.5(c)(1).

- Sample(s) undergoing treatability studies at the laboratory or testing facility, as specified in 40 CFR 261.(e) or 40 CFR 261.5(c)(1).

- Hazardous waste that is a recyclable material such as ethyl alcohol or scrap metal, as specified in 40 CFR 261.6(a)(3) and is recycled. Or as specified in 40 CFR 261.5(c)(1).

- A residue of hazardous waste in an empty container less than the amounts specified in 261.7(a)(1) or as specified in 40 CFR 261.5(c)(1).

- Managed immediately upon generation only in on-site elementary neutralization units, wastewater treatment units, or totally enclosed treatment facilities without being stored or accumulated first (40 CFR 261.5(c)(2)). [Note: if the residue generated from these units is a hazardous waste, it is counted toward the site's regulatory status and is reported.]

- Recycled on-site without prior storage or accumulation (40 CFR 261.5(c)(3)).

- Recycled used oil that is hazardous waste solely because it exhibits a hazardous waste characteristic and is managed under 40 CFR Part 279 or (40 CFR 261.5(c)(4)).

- Spent lead acid battery managed under the requirements of 40 CFR Part 266, Subpart G which includes persons who reclaim spent lead-acid batteries that are recyclable materials, persons who generate, transport, or collect spent batteries, who regenerate spent batteries, or who store them (other than spent batteries that are to be regenerated. (40 CFR 261.5(c)(5).

- Universal waste and is managed as such under 40 CFR 261.9 or 40 CFR 261.5(c)(6).

- Hazardous waste when removed from on-site storage that was counted prior to entering storage (40 CFR 261.5(d)(1)). [Note: since the hazardous waste is counted prior to entering storage, the shipment of this waste must be reported.]

- Hazardous waste produced from on-site treatment so long as the hazardous waste that is treated was counted once (40 CFR 261.5(d)(2)). [Note: since the hazardous waste is counted prior to being treated on-site, it must be reported.]

- A spent material that is generated, reclaimed, and subsequently re-used on-site so long as such spent material was counted once (40 CFR 261.5(d)(3)). [Note: since the hazardous waste is counted prior to being reclaimed on-site, it must be reported.]

- Materials which are excluded from being a waste such as any mixture of domestic sewage and other wastes that pass through a sewer system to a publicly owned treatment works unless they are stored or treated in regulated units prior to being discharged. (40 CFR 261.4 specifically 261.4(a)(1)(ii)).

- Wastes that are excluded form being hazardous waste such as petroleum-contaminated media and debris that fail the test for the toxicity characteristic D018 through D043 only and are subject to corrective action regulations. (40 CFR 261.4 specifically 261.4(b)(9)).

- Hazardous waste exported to a foreign country. These wastes are to be used in the determination of the generator's status but are not to be reported using the Biennial Reporting Forms. This information is collected in the Annual Export Report submitted by the generator to the United States Environmental Protection Agency. 262.56 (40 CFR 262.41(a)).

Page 15, ITEM BY ITEM INSTRUCTIONS

Section II: On-site Generation and Management of Hazardous Waste During 2001
Revised instructions:
Remove last sentence in paragraph one and the bullets which follow this sentence ("For each hazardous wastewater managed on-site and ultimately discharged:"). The bullets refer to NPDES, POTW, and injection wells.

Page A-1, APPENDIX A, EXAMPLES OF COMPLETED 2001 HAZARDOUS WASTE FORMS

The current instructions will be modified to add the following new examples. Please provide any other examples that you believe would be helpful.

- Waste solvent shipped off-site
- Waste solvent that is accumulated on-site before being reclaimed on-site and the distillation bottoms shipped off-site
- Generation of electroplating sludge from a wastewater treatment unit
- Corrosive waste that is shipped off-site to a POTW
- Waste disposed on-site in a deep well/underground injection

16) Streamline Source, Origin, Form, and Management Codes

Background

The following three recommendations will be implemented to streamline and improve the usefulness of reported waste information:

1) Current source codes will be consolidated, regrouped and merged with the current origin codes to provide a simpler coding structure.
2) Form codes will be revised resulting in a reduction from 89 to 47 codes.
3) Management Method codes will be revised to eliminate overlap with form codes.

Combining Source and Origin Code

Analysis

There is significant complexity in the way the existing Biennial Reporting source of generation and origin codes are defined. This complexity is a result of the overlap in the coverage areas of the two coding structures, which has led to a number of data quality and consistency problems. Analysis of the 1995 Biennial Report data has shown that 96% of GM forms submitted included an origin code and 94% a source code. Given the high response rate, it is essential that respondents understand their usage and the complexities and the overlap be resolved.

The 1995 Biennial Report used the following five origin codes:

1. As-generated process-derived waste.
2. Cleanup, spills, remediation, and equipment decommissioning.
3. Residual from on-site management of a non-hazardous waste.
4. Received from off-site and NOT recycled or treated on-site.
5. Residual from on-site management of a hazardous waste.

The same report used some sixty source codes in the following seven high-level source groups:

Group 1 (A01-A19) Cleaning and degreasing
Group 2 (A21-A29) Surface preparation and finishing
Group 3 (A31-A49) Processes other than surface preparation
Group 4 (A51-A60) One-time and intermittent production-related processes
Group 5 (A61-A69) Remediation-derived waste
Group 6 (A71-A89) Pollution control and waste treatment processes
Group 7 (A91-A99) Other processes

<u>Overlap</u>

Conceptually, there is significant overlap between the origin and source coding structures.
- Origin 1 (as-generated) subsumes Source Groups 1, 2, and 3 (production and service processes).
- Origin 2 (cleanup, spills, etc.) generally includes Source Groups 4 and 5 (intermittent, one-time and remediation).
- Origin 4 (received from off-site, no TDR) has no corresponding Source Group.
- Source Group 7 (other non-production processes) has no analogue Origin.
- Wastes from Source Group 6 (pollution control and waste treatment) may have either Origin 5 (residual from managing hazardous waste) or Origin 3 (residual from managing non-hazardous waste) and may also be viewed by some reporters as an integral part of their production processes.

- An example of the latter is K061 baghouse dust: it is definitively described by Source A78 (air pollution control devices), but is obviously tied to the *production* of steel. Is this more appropriately an example of a residual from on-site management of a hazardous waste (Origin 5) or of as-generated process-derived waste (Origin 1)?

Correlation

The overall correlation at a high level between reported origin and reported source is good. Some inconsistencies do appear, due in part to confusion on the part of reporters and the more specific and complex nature of the source coding structure. Additionally, respondents often provide ambiguous answers to some questions, typically by choosing "other" categories. In the 1995 Biennial Report, each source code group contained an "Other + specify in comments" choice and overall, 20% of GM forms indicated one of these, including 4% using Source Code A99 (Other Processes + Other).

Fulfilling Information Needs

Source codes in groups A1 through A3 (cleaning and degreasing; surface preparation and finishing; and other production processes) meet the programmatic need to identify wastes from *ongoing generation from production and service processes* and source codes in group A6 (remediation-derived waste) meet the programmatic need to identify waste generated by *remediation of historic contaminatio*n. Group A7 (pollution control and waste treatment) addresses the programmatic need to identify wastes that are *residuals from active on-site management of hazardous waste*. However, Group A5 (one-time and intermittent production-related processes) includes specific codes for both wastes *generated once or sporadically* and wastes *generated by current spills or accidental releases*, two categories that should be distinct. Group A9 (other processes) does not correspond to current information needs identified by the RCRA program.

Recommendation

The current source codes will be consolidated, regrouped, and merged with the origin codes to provide a simpler coding structure. It is intended that this approach will provide more meaningful and consistent responses, reduce at least some of the reporting burden, and support the high-level information categorization needs of the RCRA program. This scheme would reduce the number of choices from 60 to 30 and the groups from 7 to 6. We believe that this proposal will result in increased data accuracy and quality through reduced variation in response.

Table 1 provides a proposed coding structure, which is intended to provide a basis for evaluation and discussion.

Table 1. Source Codes

Code		Old Code(s)
Wastes directly from ongoing production and service processes		
G01	Dip, flush or spray rinsing	A04, A05, A06, A31
G02	Stripping and acid or caustic cleaning	
G03	Plating and phosphating	
G04	Etching	
G05	Metal forming and treatment (pickling, heat treating, etc.)	A27
G06	Painting and coating	
G07	Product and by-product processing	
G08	Removal of spent process liquids or catalysts	

G09	Other production or service-related processes(specify in comments)	A49, A29, A07, A08, A19
	Other Intermittent events or processes	
G11	Discarding off-specification or out-of-date chemicals or products	
G12	Lagoon or sediment dragout and leachate collection	
G13	Cleaning out process equipment	
G14	Removal of tank sludge, sediments or slag	
G15	Process equipment change-out or discontinue use of equipment	
G16	Oil changes and filter or battery replacement	
G19	Other one-time or intermittent processes(specify in comments)	
	Pollution control and waste management process residuals	
G21	Air pollution control devices (baghouse dust, etc)	
G22	Laboratory analytical wastes (used chemicals)	
G23	Wastewater treatment (sludge, filter cake, etc)	
G24	Solvent or product distillation or recovery (sludge, waste)	
G25	Hazardous waste management - indicate management method	A71-A74, A76, A77, A79, A89
	Spills and accidental releases	
G31	Accidental contamination of products, materials or containers	
G32	Cleanup of spill residues	
G33	Leak collection and floor sweeping	A53
G39	Other cleanup of current contamination(specify in comments)	NEW
	Remediation of past contamination	
G41	Closure of hazardous waste management unit under RCRA	
G42	Corrective action at a solid waste management unit under RCRA	
G43	Remedial action or emergency response under Superfund	
G44	State-program or voluntary cleanup	
G45	Underground storage tank cleanup	
G49	Other remediation(specify in comments)	
	Waste not physically generated on-site	
G61	Hazardous waste received from off-site for storage/bulking and transfer off-site for treatment or disposal.	A89, NEW (Origin = 4)
G62	Hazardous waste received from a foreign country,(not a foreign Department of Defense site, Malquiladora, US territory or protectorate) This site was the generator of record.	NEW

Simplify Management Method Codes

NOTE: The term management method is being used to refer to the system type used to treat, store, or dispose of the waste.

Analysis

Although there is no conceptual overlap, the current management method coding structure duplicates and conflicts with the use of form codes. For example, there are five distinct management method codes for waste incineration, depending on the physical form of the waste being incinerated. This leads to such reporting “anomalies” as a waste

of the physical form B201 (concentrated solvent-water solution) being managed by system M043 (incineration + solids). It is impossible to know which of these conflicting data points is accurate.

Recommendation

The existing management method coding structure will be revised to eliminate overlap with form codes. This coding structure is based in part on analysis of the frequency and perceived accuracy with which different management method codes were reported in the 1995 BRS data. The impact of the LDR treatment codes was also considered in establishing this list. This reduces the detailed list from 65 entries to 28 and the high-level groups from 14 to 4. We believe this proposal will result in increased data accuracy and quality through reduced variation in response with a notable decrease in burden for both the handlers as well as program implementers.

Table 2 provides a proposed coding structure, which is intended to provide a basis for evaluation and discussion. To avoid confusion and re-training issues the present list of Management Method codes has been revised and consolidated under the old numeric coding scheme but using the new designation of "H" rather than creating an entirely new list. Table Y presents the revisions to the current list of Management Method codes.

Table 2: Management Method Codes

Code	Waste handling method	Old Code(s)
	Reclamation and recovery	
H010	Metals recovery including retorting, smelting, chemical, etc.	M011-M019
H020	Solvents recovery	M021-M029, M104
H039	Other recovery or reclamation for reuse including acid regeneration, organics recovery, etc.(specify in comments)	M031-M039
H050	Energy recovery at this site - use as fuel (includes on-site fuel blending)	M051-M059
H061	Fuel blending prior to energy recovery at another site.	M061
	Treatment	
H040	Incineration - thermal destruction other than use as a fuel	M041-49
H071	Chemical reduction with or without precipitation	M071
H073	Cyanide destruction with or without precipitation	M073
H075	Chemical oxidation	M075
H076	Wet air oxidation	M076, M084, M093
H077	Other chemical precipitation with or without pre-treatment	M072, M074, M077
H081	Biological treatment with or without precipitation	M081, M091
H082	Adsorption	M082, M092, M103
H083	Air or steam stripping	M083
H101	Sludge treatment and/or dewatering	M101, M102, M109
H103	Absorption	M103
H111	Stabilization or chemical fixation prior to disposal at another site.	M111
H112	Macro-encapsulation prior to disposal at another site.	M112, NEW
H121	Neutralization only	M121
H122	Evaporation	M122
H123	Settling or clarification	M123
H124	Phase separation	M124

H129	Other treatment (specify in comments)	M078, M079, M085, M089, M094, M089, M099, M119, M125, M129
	Disposal	
H131	Land treatment or application (to include on-site treatment and/or stabilization)	M131
H132	Landfill or surface impoundment closed as landfill (to include on-site treatment and/or stabilization)	M132, M133
H134	Deepwell or underground injection (with or without treatment)	M134
H135	Discharge to sewer/POTW or NPDES (with prior storage - with or without treatment)	M135, M136
	Storage and Transfer	
H141	Storage, bulking, and/or transfer off-site (no treatment, fuel blending, or disposal on-site)	M141

Simplifying Form Codes in the Biennial Report

Analysis

The physical form of a generated waste is collected on the Biennial Reporting forms using 89 specific codes in 9 high-level groups. This is the most elaborate of the Biennial Reporting form coding structures and the most difficult to analyze. It appears to be prone to error and ambiguity. The form codes are being revised to meet the current information needs of the RCRA program.

The existing form codes are used by the EPA and States to further describe the waste as a whole and to collect information in some cases not included in the Waste codes. An example of this is the presence or absence of Cyanides in F006 plating sludge, which is an important factor in determining proper handing and minimization strategies. The new Form codes combine very similar old codes using the information that is included in the Waste codes to reduce the complexity and overlap of information between the two. This maintains the level of information needed by the EPA and the States to effectively implement Pollution prevention and compliance oversight management strategies. At the same time, wastes that were hard to correctly choose a form code for before have been better described and categorized, both decreasing confusion for the reporters and yielding better defined data for the implementer.

Recommendation

The current form codes will be revised to streamline the codes. The improvement reduces the number of form codes from 89 to 47 with 7 high level groups. This improvement will result in increased data accuracy and quality through reduced variation in response with a notable decrease in burden for both the handlers as well as program implementers.

Table 3 provides a proposed coding structure, which is intended to provide a basis for evaluation and discussion. To avoid confusion and re-training issues the present list of form codes has been revised and consolidated under the old numeric coding scheme but using the new designation of "W" rather than creating an entirely new list. In some cases, there is not an exact translation from the old form codes to the new ones, but generally there is an easy migration path to ensure continuity for trend analysis. Table Z presents the revisions to the current list of Form codes.

Table 3: Form Codes

Code	Form Group	Old Code
	Mixed Media/ Debris / Devices - Waste that is a mixture of organic and inorganic or liquid and solid wastes or devices are not easily categorizable.	
W001	Lab packs with no acute hazardous waste	B001, B003,B009
W002	Contaminated debris: paper, clothing, rags, wood, empty fiber or plastic containers, glass, piping, other solids	B002,B406, NEW
W004	Lab packs containing acute hazardous waste	B004
W301	Contaminated soil	B301,B302,
W309	Batteries, battery parts, cores, casings	B309
W310	Filters, solid adsorbents, ion exchange resins and spent carbon	B310,B404
W320	Electrical devices (lamps, thermostats, CRTs, etc)	NEW
W512	Sediment or lagoon dragout, drilling or other muds ,	B512,B513, B514
W801	Compressed gases	B701,B801
	Inorganic liquids - Waste that is primarily inorganic and highly fluid (e.g., aqueous), with low suspended inorganic solids and low organic content	
W101	Very dilute aqueous waste containing more than 99% water	B101,B102, B114,B116
W103	Spent concentrated acid	B103,B104
W105	Acidic aqueous wastes less than 5% acid	B105
W107	Aqueous waste containing cyanides	B107,B108
W110	Caustic aqueous waste without cyanides	B106,B109, B110
W113	Other aqueous waste or wastewaters	B111,B112,
W117	Waste liquid mercury	B117
W119	Other inorganic liquid (specify in comments)	B119
	Organic liquids - Waste that is primarily organic and is highly fluid, with low inorganic solids content and low-to-moderate water content	
W200	Still bottoms in liquid form.	B601,B602, NEW
W202	Concentrated halogenated (E.G. chlorinated) solvent	B202
W203	Concentrated non-halogenated (E.G. chlorinated) solvent	B203
W204	Concentrated halogenated/ non-halogenated solvent mixture	B204,B201
W205	Oil-water emulsion or mixture	B205
W206	Waste oil	B206
W209	Paint, ink, lacquer, or varnish	B209
W210	Reactive or polymerizable organic liquids and adhesives	B210,B212
W211	Paint thinner or petroleum distillates	B211

W219	Other organic liquid (specify in comments)	B207,B208, B219
Inorganic solids - Waste that is primarily inorganic and solid, with low organic content and low-to-moderate water content; not pumpable		
W303	Ash	B303
W304	Slags, drosses, and other solid thermal residues	B303,B304
W307	Metal scale, filings and scrap (including metal drums)	B307,B308
W312	Cyanide or metal cyanide bearing solids, salts or chemicals	B312,B313
W316	Metal salts or chemicals not containing cyanides	B316,
W319	Other inorganic solids (specify in comments)	B311,B319, B314, B315
Organic solids - Waste that is primarily organic and solid, with low-to-moderate inorganic content and water content; not pumpable		
W401	Pesticide solids	B401,B402
W403	Solid resins, plastics or polymerized organics	B403
W405	Explosives or reactive organic solids	B405
W409	Other organic solids (specify in comments)	B407,B409
Inorganic Sludges - Waste that is primarily inorganic, with moderate-to-high water content and low organic content; mostly pumpable		
W501	Lime and/or metal hydroxide sludges and solids with no cyanides	B501,B502, B305,B306
W503	Gypsum sludges from wastewater treatment or air pollution control	B503
W504	Other sludges from wastewater treatment or air pollution control.	B504,B511
W505	Metal bearing sludges (including plating sludge) not containing cyanides	B505,B510
W506	Cyanide-bearing sludges	B506,B507
W519	Other inorganic sludges (specify in comments)	B508,B509, B515,B516, B519,B607

Organic Sludges - Waste that is primarily organic with low-to-moderate inorganic solids content and water content; pumpable		
W603	Oily sludge	B603
W604	Paint or ink sludges, still bottoms in sludge form.	B601,B602, B604
W606	Resins, tars, polymer or tarry sludge	B605,B606
W609	Other organic sludge (specify in comments)	B608,B609

17) Removal of Data Elements from Biennial Reporting Forms

Background

During the analysis phase of the WIN/INFORMED project, participants identified the information needs required to support the Resource Conservation and Recovery Act, Subtitle C (RCRA) and implement their authorized state programs. This recommendation supports burden reduction efforts through removal of form fields that are not necessary to support current program activities.

Note: This item recommends that the following be included on the form in the Notification of Regulated Waste Activity (EPA Form 8700-12) to capture new, nationally required information needs. Recommendation #7- "Merge common elements of current site identification forms" is also being submitted at this time. The discussion below references additions to the instructions in the Notification booklet; the submitter would enter the required data on the new Resource Conservation and Recovery Act, Subtitle C, (RCRA) Site Identification Form, which would be included in the booklet.

Recommendation

A number of data fields currently collected in the Hazardous Waste Report (EPA Form 8700-13A/B; Biennial Report) appear to no longer be needed and will be removed. State implementers and the Environmental Protection Agency (EPA) have determined that the Point of Measurement, SIC Code, and off-site availability indicators would be removed from the Biennial Report.

Recommended Form Amendments

Point of Measurement

Problem Analysis

The Biennial Report Forms currently require respondents filling out a Generation and Management (GM) Form and to indicate, using one of the following four codes, whether the waste being reported was mixed with other wastes prior to being measured or estimated. Response to this form element is optional.

WIN/Informed participants identified no significant need for this information.
Additionally, due to confusion on the part of the generator with respect to this element, the data is often of questionable quality.

Recommendation

Since the “point of measurement” data element appears to meet no current information need, it will be removed from the Biennial Report GM form.

SIC Code

Problem Analysis

The collection of the Standard Industrial Classification (SIC) code at the waste stream level was not identified as an information need by most states and the EPA, especially given the proposal to add North American Industrial Classification Standard (NAICS) codes to the new RCRA Site Identification Form.

The Biennial Report GM Form requests that respondents provide the overall SIC code for the site, rather than the SIC code for the process(es) generating the waste.

Recommendation

Remove the SIC code form element from the Biennial Reporting GM Form. Associated system information will be maintained for SIC or NAICS Code. Supplying SIC data on the GM Form is currently optional. However, the collection of the NAICS data on the new RCRA Site Identification Form will be mandatory.

Off-Site Availability

Problem Analysis

The Biennial Report Forms use the off-site availability data element to indicate whether the off-site facility where the waste is sent is a commercial treatment, storage or disposal facility (TSDF), or is only permitted to accept wastes from firms owned by the same company. Completing this data element is optional currently. WIN/INFORMED participants did not indicate any program uses for this information.

Recommendations

Remove the off-site availability form element from the Biennial Report Forms and from associated data systems, since this information is derivable by other means.

RCRA/ Radioactive Mixed Waste

Problem Analysis

The Biennial Reporting Forms currently request that LQGs reporting waste generation and TSDFs reporting waste receipt indicate whether the waste was previously mixed with nuclear source, spent nuclear or by-product material, as defined by the Atomic Energy Act of 1954, as amended. Response to this form element is optional, which means we receive an incomplete view of the affected reporting universe.

However, it is necessary to identify those sites involved in radioactive waste activities for program management purposes. The WIN/INFORMED participants felt that the need should be met by identifying the RCRA sites performing the activities, rather than by requiring detailed reporting at the waste stream level. Certain Department of Energy, State, and EPA compliance reporting agreements are based on the Biennial Report, so it has been requested that this data be collected for one more cycle.

Recommendations

Remove radioactive mixed waste reporting from the Biennial Report forms. An associated site activity check box to indicate Radioactive Mixed. "Check if Radioactive Mixed Waste" is being added to the new site identification form.

25) Make Source Code a National Element

Background

WIN/INFORMED participants expressed a program need to distinguish among the following classes of hazardous wastes:

- Ongoing generation from production and service processes
- Residuals from active on-site management (i.e., recycling, reclamation, treatment or disposal) of hazardous waste
- Generated once or sporadically (e.g., discarding off-specification or out-of-date chemicals, process equipment change-out, lagoon drag-out)
- Generated by current spills or accidental releases
- Generated by remediation of historic contamination (e.g., Superfund or State cleanups, RCRA closure or corrective action)

Within each of these general categories, participants reported the need to know in more detail the specific types of industrial or waste management processes from which hazardous wastes originate. For example, solvents are used by many industries in a number of quite different processes – cleaning, degreasing, painting, etc. – and simply knowing that a given site generates spent solvent does not provide enough information to determine whether they might benefit from a new technique to eliminate the use of solvents in only one of those processes.

This information provides detail on the specific types of processes from which hazardous wastes originate. It can be used for compliance monitoring, technical assistance and outreach, state fees and program planning, and information sharing. Requiring a Source Code will impose a minimal burden increase on the implementers and the regulated community because over 90% of submissions of the Hazardous Waste Report (EPA Form 8700-13A/B; Biennial Report) already include it.

Recommendation:

The source of hazardous waste will be made a required data element. This data element will be collected from the large quantity generators of hazardous waste and may be reported at the individual process level, at the manifest shipment level, or at the cumulative waste code level (within the reporting cycle). The implementing agency will provide the source code to the national information system at the greatest level of detail feasible within the parameters of their individual authorized programs.

Recommended Form Amendments:

Form Revisions

The Biennial Report forms are not being changed. Source Code is already on the report form.