DEEP Interpretation:
EPA ID Numbers for Contiguous Properties

Ross Bunnell, CT DEEP
Yale University Letter to DEEP

- Yale has a permanent EPA ID Number for their main HW storage area.
- Sometimes generates waste at other locations on the main Yale Campus.
- Main campus consists of about 30 contiguous city blocks in New Haven.
- When Yale ships waste from these sites can they use the EPA ID Number associated with their main HW storage area?
- If so, how should they fill out the manifest?
- Should their HW Notification be amended?
DEEP Response

• The contiguous main campus = an individual generation site.
• Yale should use the one EPA ID Number for all waste generated on the contiguous main campus.
• Yale no longer needs to obtain temporary EPA ID Numbers to ship wastes generated/stored at locations other than the main HW storage area.
• Yale should revise their HW Notification to “Yale University Main Campus.”
• LQG Standards apply to all waste generated on the contiguous main campus.
Compliance with LQG Requirements

• One-time or infrequent generation locations may necessitate:
  • HW inspection schedule/log.
  • Contingency Plan.
  • LQG training.
• Can minimize impacts of these generation events by:
  • Shipping waste off-site immediately upon generation (e.g., soil form the removal of a UST).
  • Manage as satellite accumulation containers, then transfer to main HW storage area.
  • Other ideas: DEEP HWAC “Episodic Generation” PowerPoint.
Use of Manifest and Transportation

- All off-site shipments must be manifested (since whole site is an LQG).
- Always use the EPA ID Number for the main HW storage area.
- Generator Site address: address of main HW storage area.
- Box 14: ID address where waste was actually generated.
- Any transportation not within or along the border of the contiguous main campus must be:
  - Manifested; and
  - Performed by a permitted transporter and sent to a permitted TSDF.
Questions?

• DEEP website link: copy of DEEP letter to Yale.
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