



POLICY ON USE OF TEMPORARY EPA IDENTIFICATION NUMBERS FOR USED OIL AND UNIVERSAL WASTE SHIPMENTS

Introduction

The following is a statement of policy under which the Rhode Island Department of Environmental Management ("DEM") will exercise its discretion in the assignment of temporary EPA Identification Numbers in accordance with the requirements of the Rhode Island *Rules and Regulations for Hazardous Waste Management* (the "Hazardous Waste Regulations"). The policy will apply to persons who generate used oils and/or handle universal wastes which are subject to the requirements of the Hazardous Waste Regulations. The basis for this policy originates from a need to address the differences in the State's regulatory requirements relating to the inter-state transportation of certain wastes in the New England region. In Rhode Island companies are not required to complete a uniform hazardous waste manifest for the transportation within the state of used oil, universal waste or wastes that are not hazardous as defined in the Hazardous Waste Regulations. Consequently, the generator, or handler, of the waste is not required to notify the U.S. Environmental Protection Agency (EPA) of its regulated waste activity and is not required to obtain an EPA Identification Number for the transportation of these wastes within the state. Given the unique nature of the geographic relationship between Rhode Island and the other New England States, a large percent of used oil, universal waste and "non-hazardous" waste is shipped out of State to processing and treatment facilities in the surrounding States. Some of these States, including but not limited to, Massachusetts and Connecticut require generators (or handlers) to complete a uniform hazardous waste manifest for shipments of used oil and universal waste that enter those states. In addition, these States designate certain wastes as hazardous waste while Rhode Island's regulations do not classify the subject wastes as hazardous waste.

As a result, a company in Rhode Island which is not required to obtain a permanent EPA Identification Number under R.I.'s Hazardous Waste Regulations is compelled to obtain a temporary EPA Identification Number in order to complete the manifest required to ship its waste out of state. Given the high number of automotive mechanical shops that send their used oil out of state for recycling, RIDEM ends up issuing a large number of temporary EPA Identification Numbers to facilitate this transportation activity. The process of issuing temporary identification numbers is not automated and so RIDEM dedicates a great deal of time and resources to this activity, which is generally limited to business hours during weekdays.

Purpose & Applicability

This policy has been developed to further the Department of Environmental Management's goals of protecting environmental quality and public health while promoting efficiency and maintaining accountability. Implementation of this policy will streamline the way DEM issues Temporary EPA Identification Numbers to facilitate the out of state transportation of certain wastes that do not pose significant environmental or human health risks. Implementation of this policy will assist local businesses, including waste transportation companies, by removing the need to contact RIDEM by telephone during restricted hours to obtain a temporary identification number. This policy shall only apply to the out of state shipment of used oil, universal waste and "non-hazardous" waste as defined in the Hazardous Waste Regulations. The use of Temporary EPA Identification Numbers as outlined in this policy for shipments that include other hazardous wastes as defined in the Hazardous Waste Regulations is strictly **prohibited** and will result in the undertaking of an enforcement action(s) by RIDEM against the generator of the subject waste(s).

Standardized Temporary EPA Identification Numbers

All generators of used oil, universal waste or "non-hazardous" waste, that are not otherwise required to obtain an EPA Identification Number, may use the following standardized numbers for the completion of uniform hazardous waste manifests for out of state shipments of these wastes subject to the restrictions provided above. The standardized numbers are as follows:

Used Oil: **RIO 000 000 000**

Universal Waste: **RIU 000 000 000**

Non-Hazardous Waste: **RID 999 999 999**

Any shipment that contains wastes other than those identified above shall be handled in accordance with all of the applicable requirements of the Hazardous Waste Regulations. If a generator requires a temporary EPA Identification Number for a one time shipment of hazardous waste, the generator shall contact RIDEM at (401) 222-1360 between the hours of 8:30am and 4:00 pm during week days. Please be advised that Generators should include all applicable waste codes on the manifest that are required by the receiving State's regulations for these shipments.

Effective Date

This Policy is effective upon the date it was executed by a duly authorized representative of RIDEM. This Policy is for the use of RIDEM and companies that generate and/or handle specific wastes in Rhode Island subject to the authority of the environmental statutes and regulations that DEM administers.

Signed by Terrence Gray, DEM Associate Director for Environmental Protection
Effective Date 4 October 2013