

Hazardous Waste Periodic Waste Generation – How to answer Business Activities questions

How should a facility that used a Temporary EPA ID# to ship waste generated for a one-time occurrence or short duration event (e.g., asbestos abatement, removing of underground tanks, removal of hazardous waste from an abandoned building) answer the Business Activities question, “Does your facility generate Hazardous Waste?”

Answer: No. A facility that generates a waste as defined in 66261.2 and that is hazardous as defined in 66261.3 is a hazardous waste generator. However, a facility that does not normally generate hazardous waste and uses a temporary EPA ID number to ship waste generated for a one-time instance or a short duration event is generally not subject to hazardous waste permits, fees, and routine inspections. Therefore, a facility that ships waste under a temporary EPA ID number should not report to CERS that they are a generator of hazardous waste.

Hazardous Waste

Does your facility generate Hazardous Waste? ▾

Yes No

If yes, provide an EPA Identification Number (EPA ID).

Can a facility that generates hazardous waste rarely, but routinely, use a temporary EPA ID Number?

Answer: No. Temporary EPA ID Numbers are used for people or businesses who do not typically generate hazardous waste. Examples of non-routine (not ongoing) activities include asbestos abatement, removing underground tanks, and removing hazardous waste that was abandoned in a leased building. In other words, temporary State ID numbers are generally used for one time or short duration events.

How should a facility that generates hazardous waste rarely, but routinely, answer the Business Activities question, “Does your facility generate Hazardous Waste?”

Answer: Yes. A facility that routinely generates hazardous waste should report that the facility generates hazardous waste. Facilities should apply for a Permanent EPA ID number even if they generate waste

rarely, but routinely. Also, facilities that generate waste rarely, but routinely, should report to CERS that they are a generator of hazardous waste.

Related question:

- How should a facility respond to a CUPA that objects to a 'Yes' response to the question "Does your facility generate hazardous waste?" if they do not report the hazardous waste on the Hazardous Materials Inventory submittal or there was none present at the time of an inspection? This would occur because the facility rarely but routinely generates waste, but did not generate nor have any onsite during the reporting period so it would not be reported in the inventory.

Response: The facility should inform the CUPA that they are following DTSC guidance provided in this FAQ to provide a 'Yes' answer because waste is routinely generated at this site, even though it may not be expected to be present during the current reporting period. The facility can use the 'additional information' text field at the bottom of the Business Activities section to state, 'Although hazardous waste is generated rarely but routinely at this facility we do not anticipate generating any waste within the next 365 days.'

Rationale: If the hazardous waste is anticipated to be onsite at any time during the next 365 days it should be reported as a best estimate. If it is not anticipated to be generated during the next 365 days there is nothing to include in the inventory.