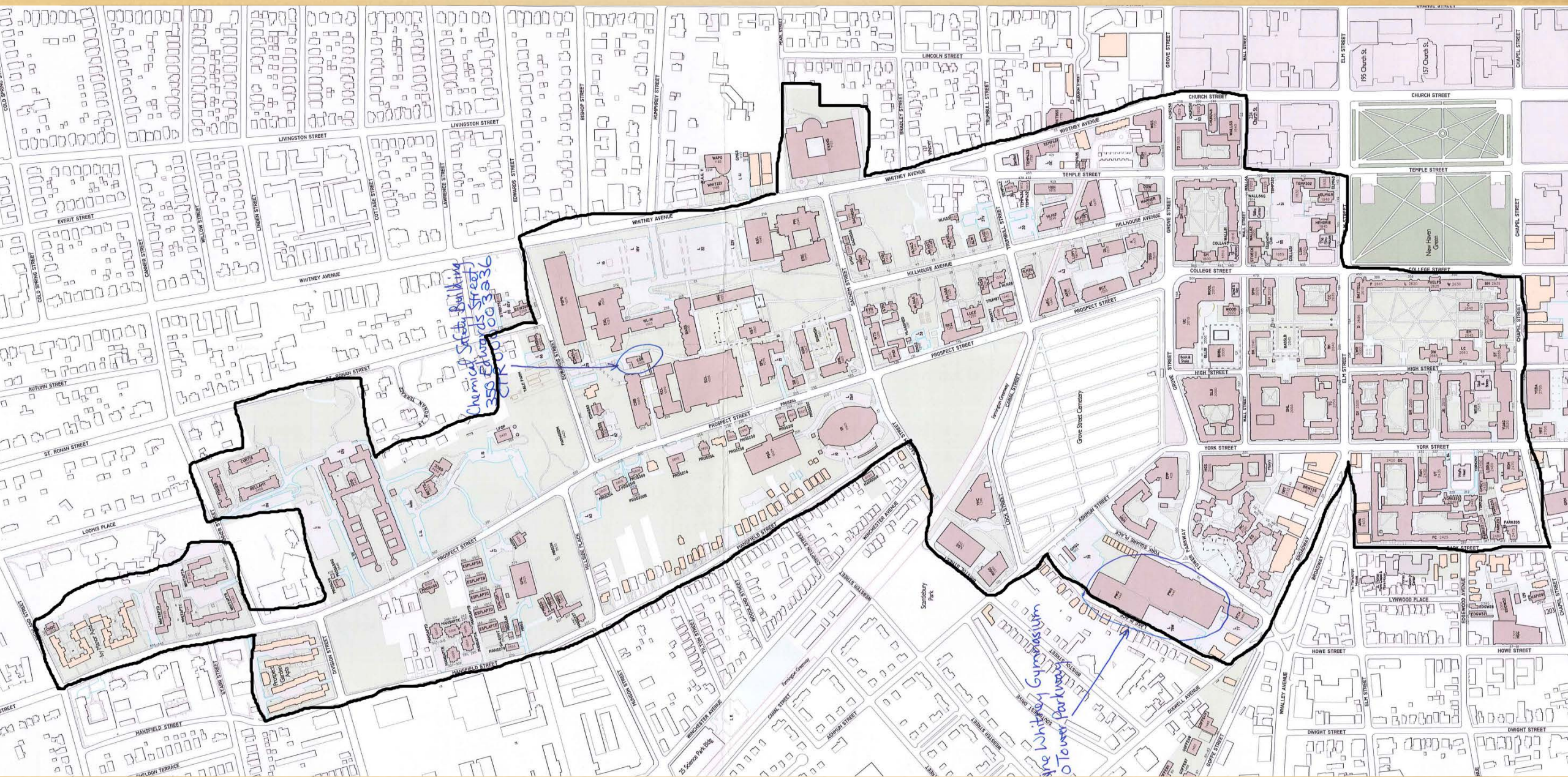


DEEP Interpretation: EPA ID Numbers for Contiguous Properties

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?



Chemical Safety Building
350 Edwards Street
CRK 1003336

The Whitney Gymnasium
0 Toward Park

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 from 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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