



Step 2: Obtain a Waste Identification Number

Hazardous Waste #1.02, September 2003

This fact sheet discusses how to get a "Waste ID" number. It is Step 2 in the "10 Steps to Compliance" series.

Inside

Environmental Concerns	1
Who Needs a Waste ID Number?	1
How do I Get One? ..	1
If You Move	2
Subsequent Notification	2
Common Questions/Answers	2
Contiguous property ..	3
More Information	3

Environmental Concerns

To track the origin and movement of hazardous waste, most companies that generate hazardous waste (called "hazardous waste generators") are required to get a Waste Identification number – formerly called an EPA ID number. The number is required on a "manifest" — a special multi-copy shipping paper that accompanies a shipment of hazardous waste.

The Waste Identification (ID) number may also be called a *Generator ID* or *EPA ID* on manifests and license applications. Most Minnesota Waste ID numbers begin with the letters 'MND,' 'MN' or 'MNR' followed by 9 or 10 digits.

Who Needs a Waste ID Number?

If your business ships hazardous waste off site using a manifest or takes waste to a Very Small Quantity Generator Collection Program, you must obtain a Waste ID number. There is no cost to get a number.

Unless required for reporting by your regulatory authority, you do not need a number if you:

- already have an EPA ID number; or
- do not ship hazardous waste off site; or
- only generate used oil and/or used oil filters; or
- only generate special wastes that can be shipped using a waste-tracking invoice; or
- take your waste to a Household Hazardous Waste Collection Program that does not require an Waste ID number; or
- are a Minimal Quantity Generator taking waste to collection program.

How Do I Get One?

To get a Waste ID number:

1. Complete the *Notification of Regulated Waste Activity* ("the form") following the instructions that accompany the form; and
2. Send it to the Minnesota Pollution Control Agency (MPCA) at the address given on the form.

If you have never applied for a number, check Box A, *Initial Notification*. To complete the form you will need to know:

- that you must use the exact same business name and location (called *Name of Site and Location of Site*) on the form that you intend to use on hazardous waste manifests,
- the waste code(s) for each hazardous waste you generate,
- your generator size,
- the owner of your business and property; and
- other business information.

If you don't know this information, Table 2 on the instruction sheet may help you.

When a Waste ID number has been assigned to your location, the MPCA will send you a notification response letter. If you are located in the 7-county metropolitan area, the MPCA will also notify your metropolitan county hazardous waste office. Keep the verification letter you receive showing your assigned number and associated information for your records.



If You Move

Waste ID numbers are site specific — they are assigned to your location, not your business name — so if you change your business location, **you must apply for a new number for your new location.** This will be an *Initial Notification* for your new location. At the same time, attach a short letter to the form notifying the MPCA that you are no longer at your old location and asking that the Waste ID number for your old location be inactivated. If the post office changes your address, refer to *Subsequent Notification*, in the next section.

Subsequent Notification

Very Small Quantity Generators must submit a subsequent notification if:

- they have not moved but the post office changes their address, or
- the ownership of their company changes.

Small and Large Quantity Generators must submit a subsequent notification if *any* information from the previous notification changes.

To submit a subsequent notification, complete the Waste ID form, check Box B, *Subsequent Notification*, and write your previously assigned Waste ID number above Box C. If you are notifying because your location address has changed, but you have not physically moved, indicate the reason for the location address change after Section IV on the form.

Answers to Common Questions

Q: I have an Environmental Protection Agency (EPA) ID number. Do I also need a Waste ID number?

A: No. The Minnesota Pollution Control Agency has taken over the responsibility of assigning identification numbers from the EPA. To avoid confusion, they are now called Waste ID numbers instead of EPA ID numbers.

Q: I only generate used oil and/or used oil filters. Do I need a Waste ID number?

A: Probably not. However, if you also generate parts washer solvent waste, you may need a number, even if you manage it by mixing with your used oil. Or, if you, the generator, are first to declare your used oil is

on-specification, you need a number. Contact your metropolitan county or MPCA staff for more information.

Q: I burn used oil to heat my business. Do I need to check ‘burner’ in section VIII B-2?

A: No. This is only for utility or industrial boilers or industrial furnaces such as cement and asphalt kilns and blast furnaces.

Q: I sell or give my used oil to an oil hauler. Am I a marketer (section VIII-B1)?

A: Probably not. Before oil is sold or given to another business to burn, it must be tested to show it is ‘on specification’ (see Table 1 on instruction sheet). The business that first declares the oil to be on-specification used oil is the marketer. If your oil hauler sells the collected used oil to a burner, the hauler probably does the testing so it would then be considered the marketer. However, if you give or sell your oil to another business to burn, you could become the marketer if you are the one that first tests it and declares it to be ‘on specification.’ For more information, request MPCA fact sheet #4.34, *Marketing Used Oil*.

Q: I am a very small quantity generator (section VIII A-1c) and I transport my hazardous waste and/or used oil to a Very Small Quantity Generator Collection Site. Am I a transporter (section VIII A-2)?

A: No. This classification refers to a hauler that is licensed by or registered with the Minnesota Department of Transportation (MnDOT) to transport hazardous waste generated by many businesses.

Q: I am moving my business to a location that already has a Waste ID or EPA ID number. Can I use that number?

A: Yes, but you will need to complete a subsequent notification to update the information associated with the ID number. In this case, write the Waste ID number for your new location at the top of the Waste ID form. Fill in the rest of the form with your business and waste information. If you no longer will be shipping waste from your old location, write the identification number from your old location in the ‘comments’ section and indicate that it should be inactivated.



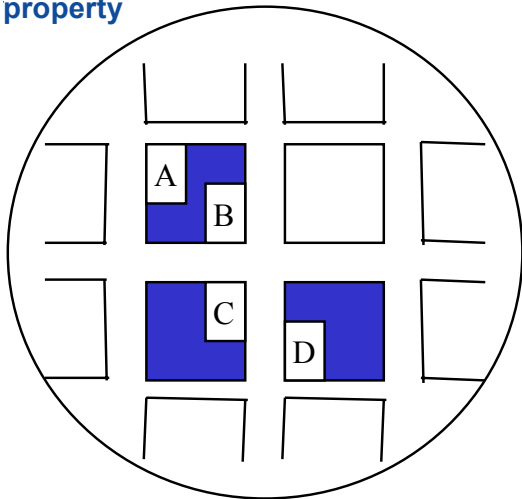
Q: My business is located in several buildings and waste is generated at multiple locations. Can I use the same number for all?

A: If the buildings are on contiguous property (explained below) and you ship from one location address, you may use one number. If you ship from more than one location address, you will need a number for each.

Contiguous and Non-Contiguous Property

Facilities, such as military installations, universities or large industrial complexes, are often split by public or private roads. Properties that are adjacent, owned by the same person and can be accessed by crossing (not going down) the right of way are “contiguous.”

Figure 1: Contiguous and non-contiguous property



Refer to Figure 1 and the following examples of contiguous and non-contiguous property (shaded areas represent city blocks owned by one company and separated by city streets):

- A and B are contiguous because they are located within the same block. If they have a common storage area, they may use the same number.
- B and C are contiguous because one can go directly across the street from one to the other. If they have a common storage area, they may use the same number.
- C and D could be contiguous if you can travel directly across the street from one property to the other at a 90° angle to the street. If they have a common storage area, they may use the same number.

- B and D are not contiguous because one must travel down a city street to get from one to the other. However, in this case, transportation down a public street between the two sites is allowable without using a manifest and a hazardous waste transporter; therefore, if these locations have a common storage area, they may use the same number. Keep in mind that if transporting down a public street, Department of Transportation hazardous materials shipping standards apply and emergency plans must address potential transport-related incidents.

If you obtain one Waste ID number for separate buildings on contiguous property, all reporting must be done under one number and one location address. If you ship from more than one address, you will need a Waste ID number for each.

More Information

Questions about Waste ID numbers? Completing the form? Need additional forms? Call your metropolitan county hazardous waste office or the MPCA Customer Assistance Center. Need a form? Request HW fact sheet #7.09 or go to the MPCA Web site

<http://www.pca.state.mn.us/publications/w-hw7-09.pdf>

Metro County Hazardous Waste Offices

Anoka County	(612)422-7093
Carver County	(952)361-1800
Dakota County	(952)891-7020
Hennepin County	(612)348-8100
Ramsey County	(651)773-4466
Scott County	(952)496-8177
Washington County	(651)430-6655

Minnesota Pollution Control Agency

Toll free	(800)657-3864
Brainerd	(218)828-2492
Detroit Lakes	(218)847-1519
Duluth	(218)723-4660
Marshall	(507)537-7146
Rochester	(507)285-7343
St. Paul	(651)297-2274
Willmar	(320)214-3786
Customer Assistance Center	(651)296-5763
Toll free	(800)646-6247

Web Site <http://www.pca.state.mn.us>