

DEPT. OF ENVIRONMENT AND ENERGY

This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.

24-005

February 2024

How to Apply for an EPA Hazardous Waste ID (EPA Site ID)

Title 128 – <u>Nebraska Hazardous Waste Regulations</u> requires all small quantity and large quantity generators, TSDFs, and transporters or handlers of hazardous waste to obtain an EPA Site ID. Conditionally exempt small quantity generators are not required to obtain a Site ID but may if they wish. The EPA Site ID is used on all communication to and from EPA and/or Nebraska and the generator to help ensure the correct facility is receiving communication.

Site IDs are assigned to a site location and not to a business or entity. If you suspect the site may have previously had a site ID that should be reactivated, contact NDEE at 402-471-2186 to locate the previous ID.

• To Register:

- Visit: https://rcrainfo.epa.gov/
- Register as an Industry User
 - Write down your password. You will be prompted prior to finishing your application to re-enter your password. Autofill will not suffice this action.
 - Register using your own name. Your name will appear as the signatory on the application. Applications can be submitted on the behalf of another individual or company if approved by that entity.
- Select Request New Site
- Complete The Online Application Form: All sections with a * are required to be filled out. If for any reason you need to leave the form, scroll to the bottom and select Finish Later to save data entered.
 - Reason for Submittal: Select the most appropriate option. Usually, when obtaining an ID, the first option "Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity [Source N]" will be the option selected. A manifest broker refers to a position within a business that handles manifests for multiple clients using the EPA ID. If you are a manifest broker but are applying for an EPA Site ID that will only be used for one facility, do not select manifest broker.
 - 2. Site ID: This will be assigned upon approval by NDEE or EPA.
 - 3. Site Name: Provide the company/facility name as it appears on your W-9. This should not be the address. In cases that generation occurred on the highway or an unspecified location, use the company responsible and general cause for which it occurred, e.g., Trucking Company X and Spill.
 - 4. Site Location: The physical address where the waste is generated and/or picked up. Include suite, unit, building number, etc. if the address is shared with another facility. In cases that generation occurred on the highway or area without a

specific location, be as detailed as possible, e.g., Interstate 80 S Mile Marker 22.2 and include GPS coordinates.

- 5. Mailing Address: This should be where the facility receives mail and may be a PO Box if needed.
- 6. Site Land Type: Private land should be selected if the land is owned by an individual or private entity. If the land is owned by a municipality, state, other governing entity, etc. select the corresponding land type.
- 7. NAICS Codes: Search by using key words related to the type of business. The system will replay a list of potential codes. Choose the most appropriate code. <u>https://www.census.gov/naics/</u> can also be used to narrow down options.
- 8. A-b. Site Contact Person and Address: Name and address of the designated contact for the facility. The address may be the mailing address for the facility. The site contact person should be on site and familiar with RCRA regulations. Additional site contacts may be listed below 8b. It is not guaranteed that contacts listed as additional contacts will be copied on all communication with the facility.
- 9. Legal Owner and Operator: Information for the legal building owner and facility operator. These may be the same contact.
- 10. Type of Federal Regulated Waste Activity:
 - 10A1: Hazardous Waste Activities: Select the generator status that applies to your current generation amount. Generation amounts can be updated as needed through new submissions of Subtitle C Site Identification Forms. To compare hazardous waste generation amounts visit <u>NDEE's Guidance</u> <u>Document for Comparison of Hazardous Waste Generator Requirements</u>. Fill out the Generator of Hazardous Waste (State) to match the federal status. Nebraska currently does not have state specific wastes that need to be reported.
 - 10A2: Short Term Generator. Fill this out if the generation of hazardous waste will not be continuing long term for this facility. Examples of why short-term generation may need to be selected include: a clean up of spilled product or waste, clean out of tanks or pits, closure of a facility. Please provide an explanation in Section 18. Comments. If hazardous waste generation is not expected to continue, you may be assigned a NEX ID by NDEE. This ID is assigned when hazardous waste is not expected to be produced again at the site (such as a spill on a highway). This number is set to expire after 45 days but will require you to submit manifests to NDEE showing the waste was shipped off and actions have been completed. Nebraska has not adopted the episodic generation ruling. All periods of increased hazardous waste occurring for a limited period will be considered short term generation.
 - 10A3-6: Most sites will not need to fill out these sections. A site that recycles their own hazardous waste (e.g., the site has a solvent distillery on site) will not need to select yes on #5. Recycler of Hazardous Waste. This refers to facilities that receive waste from off site to recycle. If you are a new TSDF or recycling facility, please contact NDEE's Permitting section at 402-471-2186 to review requirements prior to submitting a Subtitle C Site Notification Form. If you believe any of these apply to your facility, please provide an explanation in #18 Comments to prevent your submission from being rejected.
 - 10B. Waste Codes for Federally Regulated Hazardous Wastes: select the appropriate codes. A description of nationally defined codes can also be found at <u>RCRAInfo Waste Code</u>.

- 10C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes: Nebraska does not have any state specific waste codes.
- 11. A-E. Additional Regulated Waste Activities: Generally, these will not need to be filled out. If you believe any of these apply to the facility, please fill these out appropriately and leave a comment in #18. Comments.
- 12. Nebraska does not participate in Subpart K.
- 13. Nebraska has not adopted federal regulations for episodic generation. Please revisit section 10A2 if obtaining an ID for a short-term generation event.
- 14. Nebraska does not participate in LQG consolidation of CESQG/VSQG waste.
- 15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) and Entire Facility: Nebraska does not participate in Notification of LQG Site Closure.
- 16. Notification of Hazardous Secondary Material (HSM) Activity: if you select yes, please provide an explanation in Section 18. Comments.
- 17. Electronic Manifest Broker: Keep the selection as no if you are filing for the site as an owner, employee, or contractor.
- 18. Comments: Include any requested information from previous sections if needed. Additional context can be added if you feel it is relevant for reviewers. Please note within this section if you would like to be assigned as a site manager.
 - It is recommended that at least two site managers are assigned per site. Site managers have the highest level of permissions for the site and can approve or remove site permissions for other individuals. Permission levels for viewer, certifier, preparer, or site management can be requested after the submission has been processed as well.

Once all sections have been filled out, select the Review button on the bottom left-hand side. If any sections needing to be filled out have been left blank, they will highlight in red and need to complete before advancing. Once no additional changes need to be made, scroll to the bottom of the form again and submit.

- Complete the e-signature agreement now if you have not done so already.
- **To Complete Your Submission:** Select Home and go to the tab that says Outstanding Site ID requests. On the right side of the screen, find Action and select the pencil icon. Make sure not to click the X in this area; your form will be deleted. Clicking the pencil icon will reopen the form. Scroll to the bottom of the screen, select review, and then scroll to the bottom of the screen again and select submit. Complete all remaining steps as prompted. You will need to resubmit your password in this section. Once all steps are completed and your status shows Pending Approval, your submission is complete and has been passed onto NDEE to review.

Your hazardous waste ID will remain active and in effect until you file a request to deactivate it and indicate regulated hazardous waste activities have ceased. Active status may subject you to fees, inspection activity by EPA and NDEE, and reporting requirements. More information can be found at <u>http://dee.ne.gov/</u>.

If you have additional questions, please call NDEE at 402-471-2186 and request to speak with Waste Compliance Section staff.

Resources:

Useful websites:

- NDEE Website: <u>http://dee.ne.gov</u>
- RCRAInfo: <u>https://rcrainfo.epa.gov/</u>
- NAICS Codes: <u>https://www.census.gov/naics</u>
- Hazardous Waste Codes: <u>https://rcrainfo.epa.gov/rcrainfo-</u> <u>help/application/publicHelp/nationallydefinedvalues/crossmodule/ndv-</u> <u>crossmodulewastecode.htm</u>

NDEE Publications:

- Title 128 <u>Nebraska Hazardous Waste Regulations</u> *Titles can be found on the NDEE website under "Laws & Regulations"*
- NDEE Guidance Document Comparison of Hazardous Waste Generator Requirements *Guidance documents can be found on the NDEE website under "Publications and Forms"*

Contacts:

- NDEE Waste Management Section:
- NDEE Toll Free Number:

(402) 471 2186 (877) 253-2603