

## **Hazardous Waste Generator EPA Identification Number**

### **Program Description**

Generators of hazardous waste are not required to have a hazardous waste permit to manage their wastes if they meet specific requirements. Many generators are required to obtain an EPA Identification Number, however. An EPA Identification Number is not a permit – it is a number issued by the State and EPA to identify a facility for hazardous waste management and tracking purposes.

The Colorado Hazardous Waste Regulations list more than 400 hazardous wastes on four lists. These are called “listed wastes”. Even if a waste does not appear on the list it is considered hazardous if it is easily combustible or flammable (ignitable); it dissolves metals or other materials or burns the skin (corrosive); it is unstable or undergoes rapid or violent chemical reaction or produces toxic gasses when mixed with water or other materials (reactive); it is a metal, pesticide, herbicide, or organic chemical at high enough concentrations that it could be harmful or toxic if released into ground water (toxic). These are called “characteristic wastes”.

Since this program impacts so many facilities in the state, a quick overview of the major requirements is provided.

### **Which Generators Must Apply for an EPA Identification Number**

There are three categories of generators. The regulatory requirements increase with the amount of hazardous waste generated. A few of the major requirements are listed below.

#### **1. Conditionally Exempt Small Quantity Generators**

Conditionally exempt small quantity generators that generate three (3) gallons or more per calendar year of waste codes F001, F002, F004 and/or F005 (halogenated and non-halogenated solvents) are required to notify the Department under Part 99 of the Colorado Hazardous Waste Regulations and obtain an EPA identification number. This is more stringent than the federal notification requirements, which do not require conditionally exempt generators to notify. Other conditionally exempt small quantity generators are not required to obtain an EPA Identification Number, though they may if they wish.

Conditionally exempt small quantity generators generate no more than 100 kilograms (about 220 pounds, or 25 gallons) of hazardous waste and no more than 1 kilogram (about 2.2 pounds) of acutely hazardous waste in any calendar month AND never accumulate more than 1000 kilograms of hazardous waste on site at one time.

#### **2. Small Quantity Generators**

Small quantity generators must obtain an EPA Identification Number. These facilities generate more than 100 and less than 1000 kilograms (between 220 and 2200 pounds, or about 25 to under 250 gallons) of hazardous waste and no more than 1 kilogram (about 2.2 pounds) of acutely hazardous waste in any calendar month AND never accumulate 6000 kilograms of non-acutely hazardous waste on site at any one time.

### 3. Large Quantity Generators

Large quantity generators must obtain an EPA Identification Number. These facilities generate 1000 kilograms (about 2200 pounds, or 250 gallons) or more of hazardous waste or more than 1 kilogram (about 2.2 pounds) of acutely hazardous waste in any calendar month.

A generator must comply with the requirements for their generator category as long as the facility generates waste as described above. Generator requirements are summarized in the Guide to Generator Requirements guidance document.

#### Fees

GENERATOR NOTIFICATION FEE - Small and Large Quantity Generators submitting a new notification under Part 99 of the Colorado Hazardous Waste Regulations must submit a ~~\$120~~ \$84\* notification fee with their Colorado Hazardous Waste Notification form. Conditionally Exempt Small Quantity Generators that are required to notify because they generate waste codes F001, F002, F004 and/or F005 are not required to pay the notification fee.

Generators submitting a subsequent notification that downgrades their hazardous waste notification status (for example, from a Large Quantity Generator to a Small Quantity Generator) must also submit the notification fee with their updated form. Subsequent notifications that are providing or updating other information (for example, contact name change) are not assessed this fee unless they are also downgrading their notification status. Generators submitting a subsequent notification that upgrades their notification status will not be assessed the notification fee.

When applicable, the notification fee MUST accompany the completed and signed notification form. If applicable, the Department will not process the notification form without the notification fee.

There are also annual Solid and Hazardous Waste Commission fees and Generator fees associated with the notification process. Facilities will be billed annually by the Department for the Generator and Commission fees and should NOT submit these with a notification form unless told to do so by the Department.

ANNUAL GENERATOR FEE - The annual Generator fees are: Conditionally Exempt Small Quantity Generators that generate three (3) gallons or more of hazardous waste codes F001, F002, F004 and/or F005 in a calendar year - ~~\$200~~ \$140\*; Small Quantity Generators - ~~\$625~~ \$440\*; and Large Quantity Generators - ~~\$3200~~ \$2240\*. Conditionally Exempt Small Quantity Generators that operate at the Small Quantity Generator status for four (4) or more months per calendar year will be assessed the Small Quantity Generator fee. Conditionally Exempt Small Quantity Generators and/or Small Quantity Generators that operate at the Large Quantity Generator status for four (4) or more months per calendar year will be assessed the Large Quantity Generator fee.

ANNUAL SOLID AND HAZARDOUS WASTE COMMISSION FEE - The annual Commission fees are: Small Quantity Generators - \$65; Large Quantity Generators - \$210.

*\*Temporary fee reduction for calendar year 2012.*

### **Application Process**

An authorized facility representative should complete the [Colorado Hazardous Waste Notification Form](#), which is available on the Internet or from the Department. The completed notification form must have original signatures and should be sent, along with a \$120 notification fee if applicable, to the Hazardous Materials and Waste Management Division's Notification Coordinator. An EPA Identification Number is usually issued within two weeks of receipt by the Department. The facility will be notified when their number is issued.

### **Duration of the Notification**

The notification and EPA Identification Number remain valid until the Department is notified in writing that the facility has changed location, has changed ownership, no longer manages hazardous waste, or until the generator status or general description of their activities changes.

### **Public Participation**

There are no public participation requirements for the EPA Identification Number notification process.

### **Guidance**

[EPA Identification Number Compliance Bulletin](#)  
[Guide to Generator Requirements](#)

### **Statutes and Regulations**

CRS 25-15-101 et. seq.  
Colorado Hazardous Waste Regulations 6 CCR 1007-3

### **Division Contact**

Customer Technical Assistance  
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