



Department of Toxic Substances Control



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March 10, 2002

To: Consolidated Transporters

SB 271 and the Issuance of New Generator Identification Numbers

Thank you for your efforts in implementing Senate Bill 271 (SB 271) and working with your customers and employees to comply with the new Consolidated Manifesting Procedures that took effect on January 1, 2002. The Department of Toxic Substances Control (DTSC) is committed to working with registered transporters to ensure the safe transportation of hazardous waste and to help you comply with laws and requirements.

This letter addresses concerns DTSC has received about delays businesses are experiencing in obtaining new identification numbers required by SB 271. As you know, SB 271 requires all generators of hazardous waste to obtain identification numbers. Previously, generators of less than 100 kilograms per month of used oil or solvents did not need identification numbers.

DTSC prepared a fact sheet in October 2001 highlighting this change, distributed the fact sheet to local Certified Unified Program Agencies (CUPAs), and posted it on the DTSC web page (www.dtsc.ca.gov). The volume of actual requests for identification numbers was, very modest until mid-January 2002. By the end of January 2002, the volume of calls was overwhelming and there have been some days when up to 2,000 callers received a busy signal. Phone waits of up to 40 minutes have been reported and the average time on hold has been as high as 18 minutes.

DTSC apologizes to you and to your customers for these delays. In a normal year, DTSC issues over 26,000 numbers, and deactivates almost as many. To implement the SB 271 change, DTSC anticipated the need to issue approximately 20,000 new numbers between October 2001 and April 2002. From October 2001 through December 2001 DTSC issued only a few hundred additional numbers more than last year. From January 2002 through February 2002 DTSC has issued almost 3,000 more numbers than during the same period last year.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.*

Steps Taken

To improve our service and ensure that all generators can obtain identification numbers, DTSC has:

- C Added temporary staff, which has reduced the delays experienced in early February;
- C Augmented phone coverage between 10 am to 12 pm and 2 pm to 3 pm, currently the busiest times;
- C Considered using the forms, e-mail, and the web to issue numbers, but determined that personal interaction is necessary to accurately complete forms and issue the numbers; and

DTSC is looking into surveying consolidated transporters to develop a more accurate estimate of the number of businesses that still need new identification numbers.

If your customers continue to experience busy signals trying to obtain an identification number, please encourage them to call during the less busy times before 9 AM, after 4PM, or Friday afternoons.

Out-of-State Generators (Federally Exempt)

Health and Safety Code section 25160.2 requires consolidated transporters to include the generator's identification number on each receipt for wastes shipped on a consolidated manifest and in the Transporter Quarterly Report to DTSC. A transporter recently asked if obtaining an identification number applies to out-of state generators that are exempt from federal requirements and are not required by their own State to obtain a number.

After reviewing this issue, DTSC finds that those out-of-state generators are under no legal obligation to obtain a number. Therefore, consolidated transporters will not be required to use an identification number if the generator's address is outside California and they are not required by federal law to have an identification number.

Transporter Quarterly Reports

SB 271 also requires consolidated transporters to submit quarterly reports to DTSC starting October 31, 2002. The first report will cover the quarter from July 1 to September 31, 2002. Procedures for electronic submission of these reports are under development. DTSC anticipates distributing procedures in March, 2002.

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In 2002 only, submission of the reports in a paper form will be allowed for any consolidated transporter that ships less than 1,000 tons per calendar year on a consolidated manifest. DTSC will distribute more information on this reporting requirement to you as soon as it is available.

Once again, I want to thank you for your effort, cooperation, and patience, and to ask you to continue to work with your customers to obtain identification numbers and to pass on the news to your customers about the best times to call when there is a shorter wait.

As always, the Statewide Compliance Division Transportation Unit is available to answer your questions. Please call (916) 255-2796 for transporter information.

Sincerely,

(original signed by)

Norman E. Riley, Chief
Statewide Compliance Division
Hazardous Waste Management Program

cc: Certified Unified Program Agencies