

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.

## Deactivating a RCRA ID

This guidance document has been produced by the Nebraska Department of Water, Energy, and Environment (DWEE) to provide information on when it is appropriate to deactivate a Resource Conservation and Recovery Act (RCRA) Environmental Protection Agency (EPA) Site Identification (ID) Number and whether renotification is more appropriate.

An EPA Site ID Number is assigned when a facility submits a Subtitle C Site Identification Form (EPA 8700-12 form) to notify of regulated hazardous waste activity. These ID numbers are tied to a physical location regardless of changes in ownership of the property.

Occasionally generators may need an EPA ID for temporary Small Quantity Generator (SQG) and Large Quantity Generator (LQG) generation events, commonly referred to as short-term generation events. For generators whose facilities have a permanent address, Nebraska does not assign temporary IDs.

### When to deactivate a RCRA EPA ID

- Before the owner or operator of the EPA ID changes to a different person or entity
  - If the owner and operator are the same and the property is sold, the original owner can submit a deactivation notification before the completion of the sale.
  - Once the sale has been finalized, the new owner or operator is responsible for updating the information and status of the site.
- If the facility ceases operation and the owner and operator does not change
- Temporary IDs that have surpassed the 45-day active period
  - Temporary and Tracking IDs are indicated by “NEX-,” or a prefix other than “NED-” or “NER-” at the beginning of an ID

### When not to deactivate a RCRA EPA ID

- After a short-term generation event where the facility is still operating as a Conditionally Exempt Small Quantity Generator (CESQG), SQG, or LQG after the end of the generation event

- A facility should renotify their generator status at the end of a short-term generation event that required them to notify as a higher generator status if they return to a lower generator status after the event.
- If the owner changes but the operator stays the same
  - If the facility is a SQG or LQG, a notification form should be submitted to update the site information, but the EPA ID will stay the same. Deactivation of the EPA ID and a request for a new EPA ID is not necessary.
- If the sale of the property to a new owner/operator has been completed and you are acting on behalf of the original owner/operator
  - The previous owner/operator of the property cannot update an EPA ID that they are no longer generating at.
  - The new owner/operator is responsible for updating the information and status of the site.

### **How do you reactivate an EPA ID?**

An EPA ID can be reactivated by submitting a Subtitle C Site Identification Form. A new EPA ID is not required unless the original EPA ID was a temporary or tracking ID.

### **How do you submit the Subtitle C Site Identification Form on RCRAInfo?**

For step-by-step instructions on submitting the Subtitle C form, refer to the DWEE Guidance Document titled “RCRAInfo Industry User Guide.”

To submit the form electronically, you need to be registered as an Industry User through RCRAInfo. If you need to register for an account, refer to the DWEE Guidance Document titled “How to Apply for an EPA Hazardous Waste ID (EPA Site ID).” You will also need to have access to the facility’s existing EPA ID. If you do not have access to the EPA ID, you will need to request access. Steps for this process can be found in the DWEE Guide titled “RCRAInfo Industry User Guide.”

### **Are there other ways for me to submit a copy of the Subtitle C Site Identification Form?**

DWEE requests that you submit notification forms using RCRAInfo. A link for the RCRAInfo website can be found in the Resources section at the end of this document. If that is not feasible for you, please email a copy of the form to [DWEE.WasteCompl@nebraska.gov](mailto:DWEE.WasteCompl@nebraska.gov). A PDF copy of the form can be found at <https://dee.nebraska.gov/forms/publications-grants-forms/was035/>.

If you have submitted the Subtitle C Site Identification Form electronically through RCRAInfo, you are not required to submit a hard copy to DWEE. Electronic submission alone is sufficient for notification.

## **RESOURCES:**

- DWEE Home Page <https://dwee.nebraska.gov/>
- RCRAInfo Website <https://rcrainfo.epa.gov/>

## **Contacts:**

- DWEE Main Number (402) 471-2186
- DWEE Toll Free Number (877) 253-2603
- DWEE Hazardous Waste Compliance Assistant (402) 471-8308
- Email questions to: [DWEE.moreinfo@nebraska.gov](mailto:DWEE.moreinfo@nebraska.gov)

## **DWEE Publications:**

- Environmental Guidance Document – “How to Apply for an EPA Hazardous Waste ID (EPA Site ID)”
- Environmental Guide – “RCRAInfo Industry User Guide”  
*Guidance documents are available on the DWEE website by clicking “Visit Nebraska Department of Environment and Energy (DEE),” selecting “Forms,” and “Publications, Grants & Forms.”*
- [Title 128 – Nebraska Hazardous Waste Regulations](#)  
*Titles are available on the DWEE website by clicking “Visit Nebraska Department of Environment and Energy (DEE),” selecting “Resources and Services,” “Laws & Regulations,” and “Rules & Regulations.”*

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*Produced by: Nebraska Department of Water, Energy, and Environment, 245 Fallbrook Blvd. Ste.100, Lincoln, NE 68521; (402) 471-2186. To view this and other information related to our agency, visit our website at <https://dwee.nebraska.gov/>.*