



**EPA Hazardous Waste Requirements  
for  
Import and Export Shipments  
with  
Interim and Final Destination Facilities**

June 5, 2017



# What is an Interim Operation?

- Pre-processing or storing waste at a site before moving it to a different facility for final recovery or disposal is called an 'interim operation'. RCRA regulations in 40 CFR 262.81 define 7 interim operations using these codes:
  - R12 Exchange of wastes
  - R13 Accumulation of wastes
  - RC16 Interim storage of wastes for shipments with Canada only
  - D13 Blending or mixing of wastes
  - D14 Repackaging of wastes
  - D15 Interim storage of wastes
  - DC17 Interim storage of wastes for shipments with Canada only
- R = recovery, D = disposal, RC and DC = for shipments with Canada only



## Listing Interim Facility and Final Facility in Notice

For exports:

- 40 CFR 262.83(b)(1)(ii) requires listing the foreign receiving facility information
- 40 CFR 262.83(b)(3) requires also listing the same information for the final foreign recovery or disposal facility if the facility listed per (b)(1)(ii) will do any of the interim recovery or disposal operations

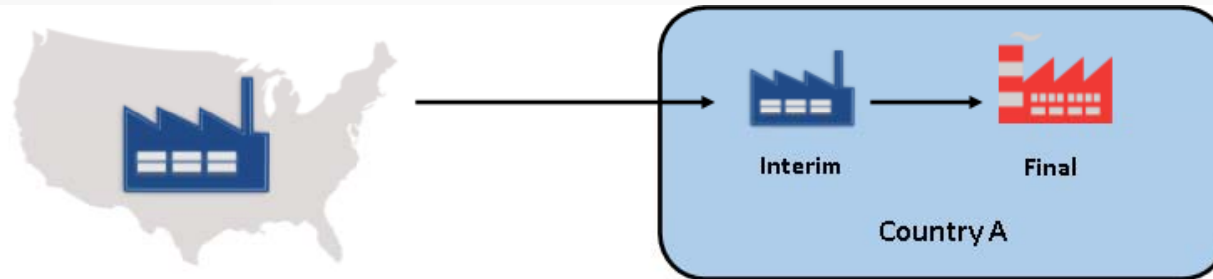
For imports:

- 40 CFR 262.84(b)(1)(ii) requires listing the U.S. receiving facility information
- 40 CFR 262.84(b)(2) requires also listing the same information for the final recovery or disposal facility if the facility listed per (b)(1)(ii) will do any of the interim recovery or disposal operations

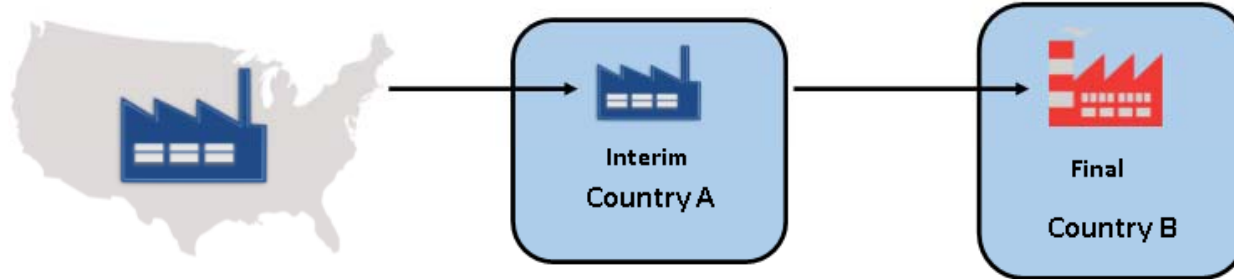
# Interim-Final Export Scenarios



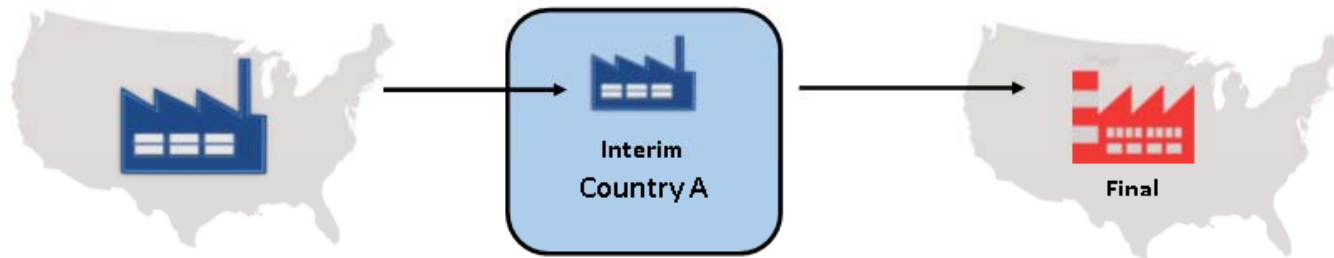
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2



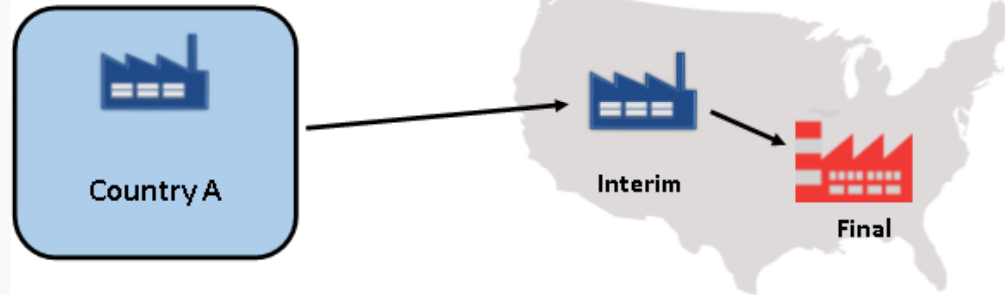
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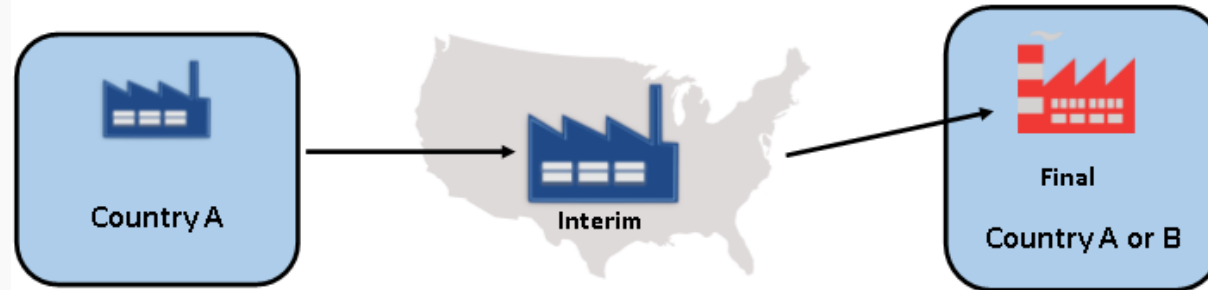
# Interim-Final Import Scenarios



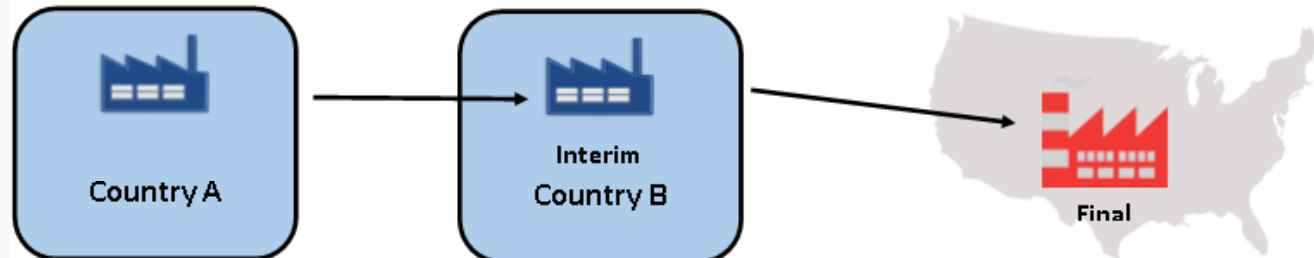
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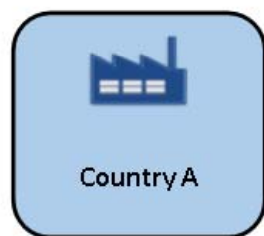
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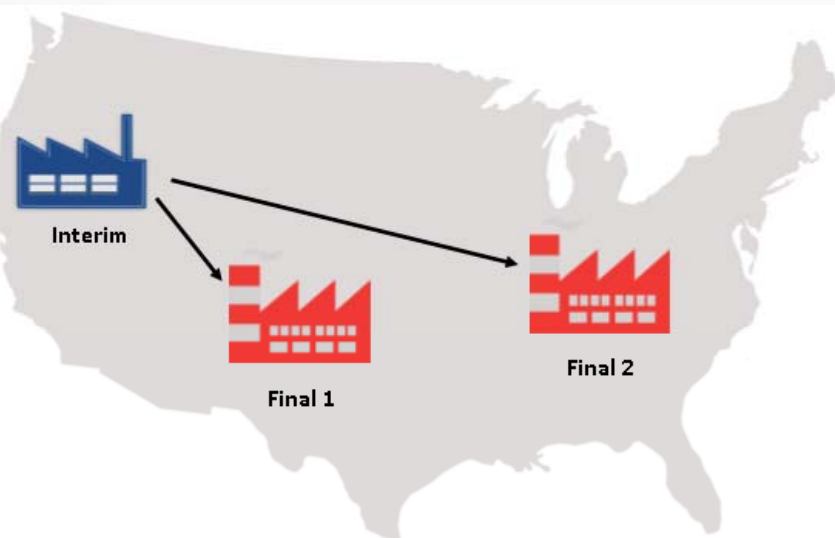
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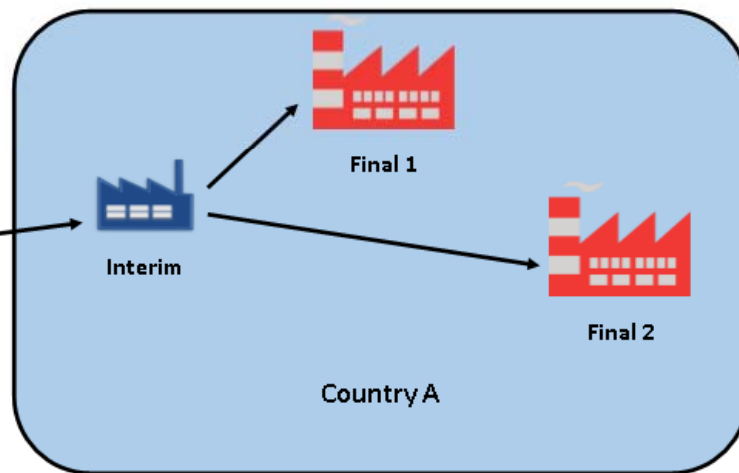
# Multiple Final Facilities = Multiple Notices



Q=10,000 tons  
F=100 shipments



Q=10,000 tons  
F=100 shipments



# Obtaining Consents



- Consent for shipment to interim facility depends on consent for shipment to final facility
- For exports, EPA will send copy of export notice to country for each listed facility to ensure consent for both interim and final obtained
  - If consent already in place for shipment from interim to final, you may let EPA know by emailing scanned copy of consent w/ subject line “Attachment documenting secondary consent for export notice XXXXXX/XXE/17”
- For imports where final facility is not in the US, EPA needs notice and consent for the second leg per 40 CFR 262.84(b)(6) and 262.83(b)(7)
  - If notice already submitted to EPA for shipment from interim to final, you may let EPA know by emailing EPA ID number and waste stream number w/ subject line “secondary notice (or consent) information for import notice XXXXXX/XXI/17”
  - If secondary notice not already submitted, you will need to submit export notice ASAP, and email EPA the original notice ID number for initial import w/ subject line “original (initial) import notice ID number for export notice XXXXXX/XXE/17”



Questions?



# Contract Requirements



## Exports:

- 40 CFR 262.83(f)(6) requires contracts or chains of contracts to list both interim facility and final facility, and contracts must specify that interim facility will (1) provide notification prior to any re-export of the waste to a final facility in another country, and (2) send secondary confirmations of recovery or disposal that it receives from the final facility to the country of import\*

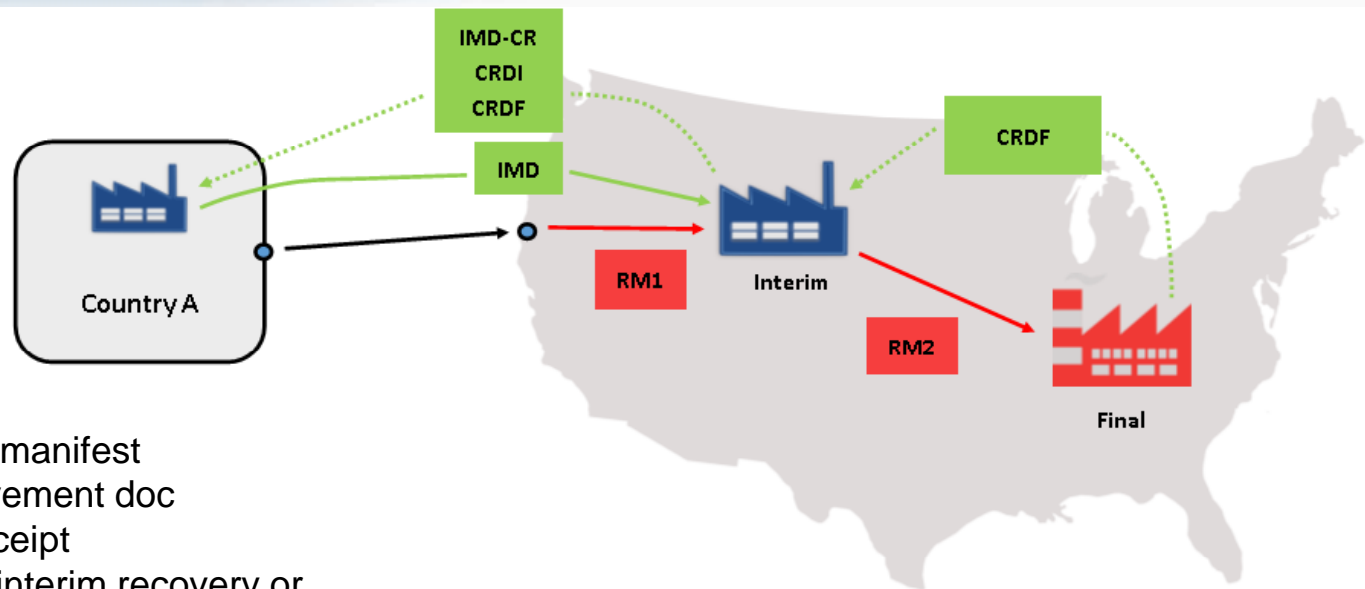
\* For contracts that will be in effect on or after the electronic import-export reporting compliance date, must also specify that interim facility send copy of secondary confirmation or recovery or disposal electronically to EPA at the same time

## Imports:

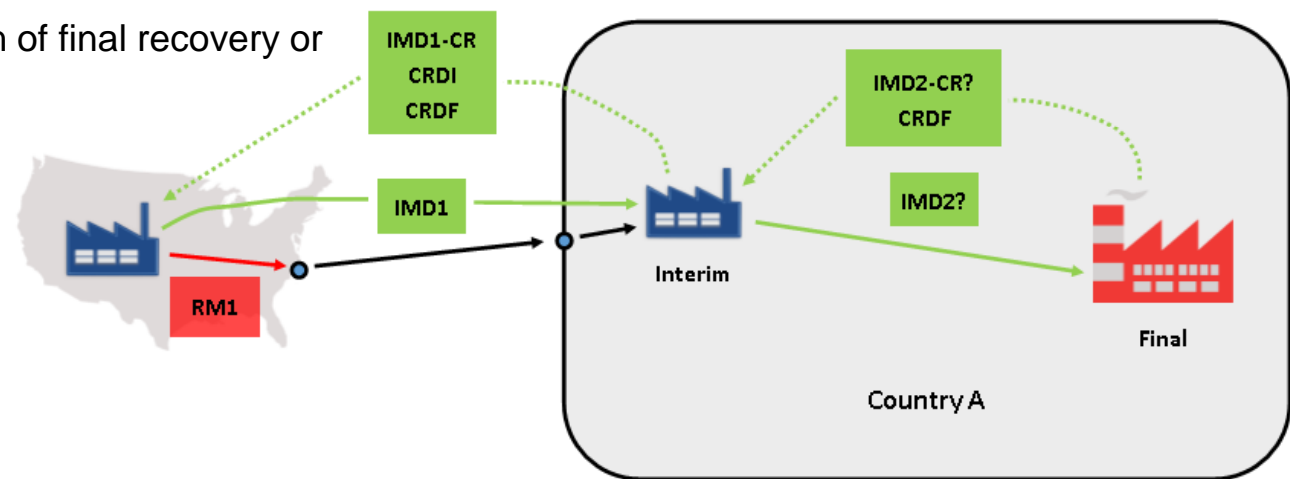
- 40 CFR 262.84(f)(5) requires that contracts specify that the US importer or US interim facility will provide notification to EPA prior to any re-export of the waste to a final facility in another country
- 40 CFR 262.84(g)(2) and 264.12(a)(4)(ii)/265.12(a)(4)(ii) requires that the US interim facility send secondary confirmations of recovery or disposal that it receives from the final facility to the country of export\*

\* For confirmations received on or after the electronic import-export reporting compliance date, the US interim facility must also send copy of secondary confirmation or recovery or disposal electronically to EPA at the same time

# Tracking Shipments



RM = RCRA haz waste manifest  
 IMD = international movement doc  
 CR = confirmation of receipt  
 CRDI = confirmation of interim recovery or disposal  
 CRDF = confirmation of final recovery or disposal





Questions?

# EPA Contacts



## EPA Notice Officers

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