

Data Source: <https://rcrapublic.epa.gov/rcrainfoweb/action/modules/main/fag/view>

Frequently Asked Questions

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1. What is the Biennial Report and who must submit it?

Pursuant to Section 3002(a)(6) of the Resource Conservation and Recovery Act, as amended, (RCRA), Congress required the U.S. Environmental Protection Agency (EPA) to develop a program for hazardous waste generators to report the nature, quantities, and disposition of hazardous waste generated. In addition, Section 3004(a)(2) of RCRA requires treatment, storage, and disposal facilities (TSDFs) to submit a report on the wastes that they receive from off-site. The biennial Hazardous Waste Report (also known as the “Biennial Report”) was implemented to comply with these requirements.

The Biennial Report compiles data collected about the generation, management, and final disposition of RCRA hazardous waste in the United States. Large quantity generators (LQGs) and TSDFs are required to submit information on waste generation and management activities occurring in odd numbered years ([40 CFR 262.41](#) for LQGs, and [40 CFR 264.75](#) and [40 CFR 265.75](#) for TSDFs).

The Biennial Report, EPA Form 8700-13A/B (available at <https://rcrapublic.epa.gov/rcrainfoweb/action/main-menu/view>), or state equivalent form must be submitted to the EPA Regional Office or authorized state agency, as applicable, by March 1st of the following even numbered years. The report includes information such as the facility's EPA Identification (ID) Number, the name and address of the facility, the quantity of hazardous waste sent to each TSDF in the United States during the reporting period, and the manner in which the waste was managed.

States authorized to implement the RCRA hazardous waste program in lieu of EPA can have regulations that are more stringent and/or broader in scope than the federal regulations. As a result, LQGs and TSDFs may be subject to additional state-specific reporting requirements. All generators should consult their state agencies to clarify the specific reporting requirements for that state.

2. Are all hazardous waste generators required to submit the RCRA Biennial Report?

Federal regulations only require large quantity generators (LQGs) to submit the Biennial Report ([40 CFR 262.41](#)). Small quantity generators (SQGs) and very small quantity generators (VSQGs) are not subject to the federal biennial reporting requirements. Note, however, that SQGs and VSQGs should consult with their implementing agency because authorized states can have hazardous waste regulations that are more stringent and/or broader in scope than the federal regulations. As a result, such generators may be subject to additional state-specific reporting requirements.

3. Who is required to sign the certification statement on the Site Identification (Site ID) Form?

The certification statement in the Site ID Form must be signed by owner(s), operator(s), or authorized representative(s) of a facility that is subject to the biennial reporting requirements. An "authorized representative" is a person responsible for the overall operation of the site (i.e., plant manager or superintendent, or a person of equal responsibility).

4. How does a hazardous waste generator, transporter, or treatment, storage, and disposal facility obtain an EPA Identification (ID) Number?

All persons who generate, transport, recycle, treat, store, or dispose of hazardous waste are required to notify of their hazardous waste activities (see 40 CFR [262.18](#), [263.11](#), [264.11](#), and [265.11](#) for federal regulations). EPA ID Numbers are obtained by filing the Site Identification (Site ID) Form (or Notification of Regulated Waste Activity, EPA Form 8700-12, available at <https://rcrapublic.epa.gov/rcrainfoweb/action/main-menu/view>) with the appropriate EPA Regional Office or authorized state agency.

5. Why have the quantities of generation, management, shipments, and/or receipts changed since my last visit to this website?

While the Biennial Report data are fairly static, hazardous waste program implementers (i.e., authorized state agencies and certain EPA Regional Offices) are allowed to make additions, revisions, and/or deletions to their data. Therefore, you may see a change in the Biennial Report data available over time.

6. What is a Large Quantity Generator (LQG)?

A site is a federal Large Quantity Generator (LQG) for a given report cycle if the site meets any of the following criteria: 1) the site generated, in any single calendar month, 1,000 kilograms (2,200 pounds) or more of non-acute hazardous waste; 2) the site generated, in any single calendar month, or accumulated at any time, more than 1 kilogram (2.2 pounds) of acute hazardous waste; or 3) the site generated, in any single calendar month, or accumulated at any time, more than 100 kilograms (220 pounds) of spill cleanup material contaminated with acute hazardous waste. (Refer to Question 7 for information on what is an acute hazardous waste.)

Authorized states may have hazardous waste programs that are more stringent and/or broader in scope than the federal program. All generators should consult their state agencies to clarify the state-specific requirements and generator status definitions applicable in that state.

7. What is acute hazardous waste?

Under federal regulations, any hazardous waste with an EPA hazardous waste code beginning with the letter "P" ([40 CFR 261.33\(e\)](#)) or any of the following "F" hazardous waste codes: F020, F021, F022, F023, F026, and F027 ([40 CFR 261.31](#)) are considered acute hazardous wastes. These wastes are subject to more stringent quantity standards for accumulation and generation than other hazardous wastes ([40 CFR 262.14\(a\)\(3\)](#)).

Under the Resource Conservation and Recovery Act, as amended, (RCRA), authorized states are allowed to promulgate hazardous waste regulations that are more stringent and/or broader in scope than the counterpart federal hazardous waste regulations. Therefore, all generators should consult their state agencies to clarify the hazardous waste requirements applicable in that state.

8. Is the generation of all hazardous waste included in the Biennial Report?

Not all hazardous waste generated during a reporting year are included in the Biennial Report. Under the federal hazardous waste program, sites are instructed to report hazardous waste that was: 1) generated and accumulated on-site and subsequently managed on-site or shipped off-site in the reporting year; or 2) generated and accumulated on-site in the reporting year but not managed on-site or shipped off-site until after the reporting year; or 3) generated and accumulated on-site prior to the reporting year but either managed on-site or shipped off-site in the reporting year; or 4) imported from a foreign country in the reporting year. Sites should NOT include the following materials and wastes in the Biennial Report: 1) materials that are excluded from being a solid waste ([40 CFR 261.4\(a\)](#)); 2) solid wastes that are excluded from being hazardous waste and are subject to the corrective action regulations under 40 CFR Part 280 ([40 CFR 261.4\(b\)](#)); 3) waste exempt from regulation because the waste has not exited the raw material storage or production unit yet as specified in 40 CFR 261.4(c) ([40 CFR 262.13\(c\)\(1\)](#)); 4) hazardous waste that has been collected as a sample(s) for the purpose of determining its characteristic or composition as specified in 40 CFR 261.4(d) ([40 CFR 262.13\(c\)\(1\)](#)); 5) sample(s) undergoing treatability studies as specified in 40 CFR 261.4(e) ([40 CFR 262.13\(c\)\(1\)](#)); 6) sample(s) undergoing treatability studies at the laboratory or testing facility as specified in 40 CFR 261.4(f) ([40 CFR 262.13\(c\)\(1\)](#)); 7) hazardous waste that is a specified recyclable material as specified in 40 CFR 261.6(a)(3) ([40 CFR 262.13\(c\)\(1\)](#)); 8) a residue of hazardous waste in an empty container or in an inner liner removed from an empty container as specified in 40 CFR 261.7(a)(1) ([40 CFR 262.13\(c\)\(1\)](#)); 9) polychlorinated biphenyl (PCB) wastes regulated under the Toxic Substance Control Act (TSCA), as specified in 40 CFR 261.8, unless mixed with a hazardous waste ([40 CFR 262.13\(c\)\(1\)](#)); 10) wastes managed immediately upon generation only in on-site elementary neutralization units, wastewater treatment units, or totally enclosed treatment facilities as defined in 40 CFR 260.10 ([40 CFR 262.13\(c\)\(2\)](#)); 11) wastes recycled, without prior storage, only in an on-site process subject to regulation under 40 CFR 261.6(c)(2) ([40 CFR 262.13\(c\)\(3\)](#)); 12) used oil managed under the requirements of 40 CFR 261.6(a)(4) and 40 CFR Part 279 ([40 CFR 262.13\(c\)\(4\)](#)); 13) spent lead-acid batteries managed under the requirements of 40 CFR Part 266, Subpart G ([40 CFR 262.13\(c\)\(5\)](#)); 14) universal wastes managed under 40 CFR 261.9 and 40 CFR Part 273 ([40 CFR 262.13\(c\)\(6\)](#)); 15) a hazardous waste that is an unused commercial chemical product (listed in 40 CFR Part 261, Subpart D or exhibiting one or more characteristics in 40 CFR Part 261, Subpart C) that is generated solely as a result of a laboratory

clean-out conducted at an eligible academic entity pursuant to 40 CFR 262.213 ([40 CFR 262.13\(c\)\(7\)](#)); 16) managed as part of an episodic event in compliance with the conditions of 40 CFR Part 262, Subpart L ([40 CFR 262.13\(c\)\(8\)](#)); 17) a hazardous waste pharmaceutical, as defined in 40 CFR 266.500, that is subject to or managed in accordance with 40 CFR Part 266, Subpart P or is a hazardous waste pharmaceutical that is also a Drug Enforcement Administration controlled substance and is conditionally exempt under 40 CFR 266.506 ([40 CFR 262.13\(c\)\(9\)](#)); 18) recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these ([40 CFR 266.70](#)); 16) unless required by your state, hazardous wastes that were, during the reporting year, exported directly out of the United States to a foreign country.

Authorized states may have hazardous waste programs that are more stringent and/or broader in scope than the federal program. As a result, generators may be subject to additional state-specific reporting requirements. All generators should consult their state agencies to clarify the hazardous waste requirements applicable in that state.

9. Is groundwater contaminated by hazardous waste reported as generation?

Groundwater contaminated by hazardous waste is not considered a solid waste in the sense of being abandoned, inherently waste-like, or recycled as those terms are defined in the Resource Conservation and Recovery Act (RCRA) regulations and is, therefore, not classified as a hazardous waste. However, because hazardous waste is "contained in" the groundwater, it must be treated "as if" it were a RCRA hazardous waste if it is removed for treatment, storage, or disposal. (For additional information, refer to *Management of Remediation Waste under RCRA*; EPA530-F-98-026; October 14, 1998; pages 9-11; RCRA Online Document Number 14291; available through RCRA Online at <https://rcrapublic.epa.gov/rcraonline/index.xhtml>). In this instance, in the Biennial Report, the generation quantity is reported as zero, but the actual quantity of groundwater managed on-site, shipped off-site for management, or received from off-site is reported.

States authorized to implement the RCRA hazardous waste program in lieu of EPA can have regulations that are more stringent and/or broader in scope than counterpart federal hazardous waste regulations. As a result, generators may be subject to additional state-specific reporting requirements. All generators should consult their state agencies to clarify the specific reporting requirements applicable in that state.

10. If a waste is transported to more than one treatment, storage, or disposal facility (TSDF), is the management of this waste at each facility included in the management totals presented in RCRAInfo Web?

To avoid counting the management of the same waste multiple times, management via Management Method Code H141 (i.e., the site receiving this waste stored/bulked and transferred the waste with no treatment or recovery, fuel blending, or disposal at that receiving site) is not included in the management totals in the Biennial Report data presented in [RCRAInfo Web](#).

11. Why does a Handler Identification (ID) Number have a different Handler Name for one reporting cycle versus another reporting cycle?

The Resource Conservation and Recovery Act (RCRA) program tracks the generation and management of hazardous waste for a physical location. A Handler ID Number (also known as EPA ID Number) is assigned to a physical location NOT a company or business. Therefore, the company or business associated with a Handler ID may vary from report cycle to report cycle.

12. What is an interstate shipment?

For purposes of the Biennial Report data presented in [RCRAInfo Web](#), an interstate shipment is a waste that was generated in one state and shipped for management to another state.

13. What is an interstate receipt?

For purposes of the Biennial Report data in [RCRAInfo Web](#), an interstate receipt is a waste that was received by a treatment, storage, or disposal facility (TSDF) in one state and generated in a state other than the state in which the TSDF resides.

14. What is NAICS?

NAICS is the acronym for North American Industry Classification System. This is the standard used by federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. To ensure the accuracy, timeliness, and relevance of the classification, NAICS is reviewed every five years to determine what, if any, changes are required (Office of Management and Budget [OMB], 79 FR 29627).

For Biennial Report purposes, a site is required to provide their primary NAICS code, i.e., the NAICS code that best describes the site's **primary** business production process for their products or services. In providing their primary NAICS code, sites should reference the latest version of NAICS (available at <https://www.census.gov/eos/www/naics/>).

15. What is a management method?

In the federal Biennial Report form or state equivalent form, management method codes are used to describe the type of hazardous waste management system used to treat, recover, or dispose of a hazardous waste.

When using or analyzing management method codes reported in the Biennial Report, the following should be taken into account: 1) In Section 2 of the Generation and Management (GM) Form, On-Site Management, waste handlers must provide the management method code that best identifies the last substantive purpose/operation performed at their site; 2) In Section 3 of the GM Form, Off-Site Shipment, waste handlers must provide the management method code that best describes the way in which the waste was managed at the initial receiving facility; and 3) In the Waste Received from Off-Site (WR) Form, waste handlers must provide the management method code that describes the type of process system in which the waste was managed.

16. Does the generation totals include only waste generated by Large Quantity Generators (LQGs) that submit the Biennial Report?

Based on federal hazardous waste regulations, LQGs are required to submit the Biennial Report. Other generators, such as small quantity generators (SQGs) and very small quantity generators (VSQGs) are not required to submit the Biennial Report. However, Biennial Report data might include SQG and VSQG data because the generation totals include any waste that implementing agencies (i.e., authorized states and certain EPA Regional Offices) indicated should be included in the national totals (i.e., the National Report). Authorized states can have hazardous waste

regulations that are more stringent and/or broader in scope than counterpart federal hazardous waste regulations. As a result, the generation totals may include wastes generated by SQGs or VSQGs, and may also include wastes that the state considers hazardous but do not meet the definition of a federal hazardous waste.

17. Do all facilities that manage hazardous waste require a hazardous waste permit?

Not all facilities that manage hazardous waste are required to have a hazardous waste permit. According to the Resource Conservation and Recovery Act, as amended, (RCRA) and its implementing regulations, facilities that currently treat, store, or dispose of hazardous wastes or plan to do so are required to obtain permission, in the form of a RCRA permit, which establishes the administrative and technical conditions under which waste at the facility must be managed ([40 CFR Part 270](#)). However, some facilities are not required to obtain a RCRA permit when handling hazardous waste provided they meet certain conditions specified in the regulations ([40 CFR 270.1\(c\)\(2\)-\(3\)](#)). Examples of these exceptions include: 1) generators who accumulate hazardous waste on site in compliance with all of the conditions for exemption provided in 40 CFR 262.14, 262.15, 262.16, and 262.17; 2) persons who own or operate facilities solely for the treatment, storage, or disposal of hazardous waste excluded from regulations under 40 CFR 261.4 or 262.14 (very small quantity generator [VSQG] exemption); 3) owners or operators of totally enclosed treatment facilities as defined in 40 CFR 260.10; 4) owners and operators of elementary neutralization units or wastewater treatment units as defined in 40 CFR 260.10; 5) transporters storing manifested shipments of hazardous waste in containers meeting the requirements of 40 CFR 262.30 at a transfer facility for a period of 10 days or less; 6) universal waste handlers and universal waste transporters (as defined in 40 CFR 260.10) managing specified wastes; and 7) entities performing treatment or containment activities taken during immediate response to an emergency.

Note that EPA establishes minimum federal standards. An authorized state implements and enforces its own hazardous waste regulations. Please consult your state's hazardous waste regulations which may be more stringent and/or broader in scope than the federal hazardous waste regulations.

18. How can I tell if a site has a hazardous waste permit?

In the [“Biennial Report” section of RCRAInfo Web](#), you can use the “Search by Site” option on the left menu to conduct searches on RCRA sites. Once you identify a site and click on its link, you will obtain the most recent information about that site (e.g., name, address). The “Selected RCRA Activities” section of the screen has a subsection titled “Permitted TSDF.” If the value is “Yes,” then this site is a permitted treatment, storage, or disposal facility (TSDF). If the value is “No,” then the site is not a permitted TSDF, even though the site may be managing hazardous waste.

19. Can I determine the amount of a regulated waste constituent (i.e., lead) in generated waste reported in the Biennial Report?

The amount of a specific hazardous waste constituent cannot be determined using Biennial Report data in [RCRAInfo Web](#). The generation totals show the amount generated at the site, state or national level. The generation totals do not differentiate between regulated waste constituents (e.g., lead, mercury).

20. When I look at the site information for a particular facility, the generator status shows small quantity generator (SQG). I thought that only large quantity generators (LQGs) submitted a Biennial Report. Why does this generator status appear?

In the [“Biennial Report” section of RCRAInfo Web](#), you can use the “Search by Site” option on the left menu to conduct searches on RCRA sites. Once you identify a site and click on its link, you will obtain the most recent information about that site (e.g., name, address). The “Selected RCRA Activities” section of the screen has a subsection titled “Generator Status.”

There are several reasons why a generator status other than LQG may appear in this subsection of the screen. 1) The generator status provided with the Biennial Report submission is the current generator status of the site. A site may have been an LQG in the reporting year, but is currently an SQG. Therefore, the site is required to submit a Biennial Report, but would report their current generator status as an SQG. 2) Authorized states have the authority to require Biennial Report submissions from sites other than LQGs and treatment, storage, or disposal facilities (TSDFs).

21. What are the requirements for very small quantity generators (VSQGs)?

Under federal regulations, VSQGs generate 100 kilograms (0.11 pounds) or less per month of hazardous waste or 1 kilogram (0.0011 pounds) or less per month of acute hazardous waste. (Refer to Question 7 for information on what is an acute hazardous waste.)

Requirements for VSQGs include: 1) identifying all the hazardous waste generated; 2) not accumulating more than 1,000 kilograms (1.10 pounds) of hazardous waste at any time; and 3) ensuring that hazardous waste is delivered to a person or facility who is authorized to manage it. Refer to [40 CFR 262.14](#) for a complete description of the federal VSQG regulations.

Authorized states may have hazardous waste regulations that are more stringent and/or broader in scope than counterpart federal hazardous waste regulations. Consequently, state generator categories can be different than the federal categories. In addition, some states may require recordkeeping or collect data on VSQGs through inspections. Generators should contact their state agency for guidance on VSQG requirements.

22. Do I need two EPA Identification (ID) Numbers if I have two companies both at the same site?

Per [40 CFR 260.10](#), a “generator” is any person, by site, whose act or process produces hazardous waste identified or listed in [40 CFR Part 261](#) or whose act first causes a hazardous waste to become subject to regulation. “Person” means an individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a state, or any interstate body. Based on the above definitions, you must apply for separate EPA ID Numbers for each distinct company (i.e., person).

Refer to the document *RCRA Subtitle C EPA Identification Number, Site Status, and Site Tracking Guidance for Managing Data in RCRAInfo* (dated March 21, 2005 and available at <https://www.epa.gov/sites/production/files/2016-03/documents/win-inform.pdf>) for additional information on RCRA policy memoranda and other documents associated with the assignment of EPA ID Numbers.

23. A generator has multiple structures within the same contiguous property. Is each structure required to have an individual EPA Identification (ID) Number?

For the purposes of generator notification and obtaining EPA ID Numbers, and assuming the structures are “on-site” as defined in [40 CFR 260.10](#), one identification number is sufficient for all structures at the facility site. For example, if a single company operates three laboratories on a single piece of property, all three laboratories may share one EPA ID Number, and the waste from all three laboratories may be evaluated together. However, if the company operates three laboratories at three different locations that are not considered to be on contiguous property, each laboratory is viewed as a separate potential generator and is required to obtain an individual EPA ID Number.

Refer to the document *RCRA Subtitle C EPA Identification Number, Site Status, and Site Tracking Guidance for Managing Data in RCRAInfo* (dated March 21, 2005 and available at <https://www.epa.gov/sites/production/files/2016-03/documents/win-inform.pdf>) for additional information on RCRA policy memoranda and other documents associated with the assignment of EPA ID Numbers.

24. Does a large-quantity generator (LQG) who generates a hazardous waste in December of a non-reporting year but ships it in January of the reporting year need to include that waste in their Biennial Report?

The LQG who generates a hazardous waste in December of a non-reporting year but ships it in January of the reporting year (e.g., generated waste in December 2018 and shipped the waste in January 2019) needs to include that waste in their Biennial Report. The LQG should indicate, in the “Comments” section of the Generation and Management (GM) Form, the date in which the waste was generated.

25. Where can the public access hazardous waste generation and management data?

EPA maintains hazardous waste generation and management data in RCRAInfo, a comprehensive information system for Resource Conservation and Recovery Act (RCRA) hazardous waste data. The public and regulated community cannot directly access RCRAInfo. Instead, they have access to selected Biennial Report data through two EPA websites that offer options for querying and downloading the data: 1) [RCRAInfo Web](#) and 2) [Envirofacts Data Warehouse](#).

Additional data, beyond what is accessible in RCRAInfo Web and Envirofacts, is available by contacting the EPA Regional Office of authorized state agency.

26. How can I locate hazardous waste treatment, storage, or disposal facilities (TSDFs) that may be within the vicinity of a specific street address?

You may find TSDFs within the vicinity of a specific street address by conducting a ["Search by Site" query in RCRAInfo Web](#). Another option is to conduct a ["Geography Search" in the Envirofacts Data Warehouse](#).

To conduct a "Search by Site" query, go to the "Biennial Report" section in RCRAInfo Web. The "Search by Site" option is on the left menu. Then, provide the report cycle and, optionally, a Site Identification (ID) Number, name, city, location (state, region, or national), and/or zip code. The site must meet all criteria provided in order to be shown on the query results.

27. Should 10 day transfer facilities report all the waste they received from off-site facilities on the Waste Received from Off-Site (WR) Form of the Biennial Report?

Transfer facilities that generate no hazardous waste and keep all waste received onsite for under 10 days typically do not have a Treatment, Storage, or Disposal Facility (TSDF) permit. Consequently, they are not considered large quantity generators (LQGs) or TSDFs and thus, are not subject to the federal biennial reporting requirements ([40 CFR 262.41](#) for LQGs, and [40 CFR 264.75](#) and [40 CFR 265.75](#) for TSDFs).

Authorized states may have hazardous waste programs that are more stringent and/or broader in scope than the federal program. Ten-day transfer facilities may be subject to additional state-specific reporting requirements. Therefore, all 10-day transfer facilities should consult their state agencies to clarify the specific reporting requirements for that state.