



## TOPIC: New Uniform Hazardous Waste Manifest

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### Introduction

US EPA issued regulations on March 4, 2005, to implement a single nationally standardized manifest that replaces a burdensome array of state-specific requirements for the Uniform Hazardous Waste Manifest.

Beginning September 5, 2006, any federal or state manifests previously used to ship hazardous waste will become obsolete. US EPA and DOT have worked together to require a new manifest to be used in every state and states can no longer have their own version of the hazardous waste manifest. If your facility ships any hazardous waste or accepts any manifested shipments, those waste shipments must be manifested using the revised EPA Form 8700-22 (and Continuation Sheet 8700-22A, as needed). Note that the new manifests must be used starting September 5, 2006, but must not be used to ship waste before then.

The goals in creating the new manifest were to: (1) standardize the forms and reduce the required content; (2) increase the availability of manifests; (3) improve tracking of wastes rejected from Treatment, Storage, and Disposal Facilities (TSDFs) and residues from containers leaving TSDFs that are not "RCRA empty;" and (4) improve tracking of hazardous waste being imported or exported.

This change should reduce the administrative burden for generators and make shipping hazardous waste simpler and less expensive for industry. Environmental and transportation standards regarding public health and safety and the security of the waste have not changed.

### Manifest Program Overview

- The new regulations take effect on September 5, 2006, in every state. Loads offered for shipment prior to September 5, 2005, must use the old manifest. Loads offered on or after September 5, 2006 must use the new manifest, EPA Form 8700-22 and 8700-22A.
- States *cannot* change any rules regarding the manifest form or continuation sheet (e.g., color-coding copies), manifest instructions, federal regulatory language, and cannot require additional information to be placed on the manifest.
- States *may* require the submittal of manifest copies to a state agency, the use of manifests for activities and wastes that are exempt from RCRA requirements, and the use of state waste codes.
- Manifest forms can only be obtained from EPA-registered providers (see "On-line Resources" below), who will assign the unique Manifest Tracking Number (MTN) to each form. The MTN consists of 9 digits with a 3-letter suffix selected by the registered provider. A state may register as a provider but may not be the exclusive provider of forms in the state.

## Summary of Major Manifest Changes

- All items on the form must be addressed. Previously, portions of the federal form were optional.
- Total Waste Quantity (Item 11) must be reported only in whole numbers (no fractions or decimals) using actual measurement, or reasonably accurate estimates. Container size may not be used as an estimate of quantity manifested.
- The Units of Measure Table specifies that gallons (“G”) and liters (“L”) are to be used only for liquid wastes. EPA advises that only very large bulk shipments (e.g., roll-off, rail car, tank truck) should use units such as tons, metric tons, and cubic yards/meters.
- Up to 6 federal and state waste codes may be entered for each waste stream. Codes should be selected so they best represent the properties of the waste stream and its hazards. State codes that are not redundant with federal codes must be entered to describe state regulated hazardous wastes for which there is no federal code and those which provide additional information not conveyed by federal codes.
- An International Shipments section is now included with specific responsibilities for the transporter, importer, and exporter of the waste.
- The management of waste discrepancies and load rejections has been greatly expanded (see “Summary of Discrepancy Management and Load Rejection” below for details).
- The Hazardous Waste Management Method Code(s) must be entered by the TSDF.
- The Generator or Offeror personnel may write or preprint the words, “On behalf of” in the signature block prior to signing the generator/offeror certification, to indicate that the individual signs as the employee or agent of the named principal. The generator’s certification is now the “Generator’s/Offeror’s Certification.” Rejected loads may be re-manifested by the designated facility as the “offeror.”

## Summary of the “New” Generator Responsibilities

Complete Items 1 through 15 prior to the waste being shipped:

- Enter a 24/7 DOT emergency response number in Item 3 (or in Item 9b if number is different for each waste stream).
- Enter site address, if different from mailing address, in addition to mailing address in Item 5.
- Check “X” in HM box for DOT hazardous materials and hazardous wastes (because they are DOT hazardous materials).
- Enter up to 6 federal and state waste codes that appropriately represent the waste in Item 13, but do not enter state codes that are the same as federal codes that are listed.
- Use the “Additional Descriptions and Special Handling” field to include information such as profile numbers, drum identification, bar code numbers, or other company specific tracking information. State and federal required information is limited to PCB information and entering original manifest tracking numbers where required for rejections.
- Make legible photocopies to send to your state or the receiving state, if required.
- Keep copy #6 of manifest and give the remaining copies to the transporter.
- Sign the manifest in Item 18c if a waste load is rejected back to your facility.

## Summary of “New” Designated Facility Responsibilities

Complete Items 18-20:

- Enter “Management Method Codes” in Item 19.
- Sign Item 20, even if entering discrepancy information and reject information in Item 18.
- Create a new manifest for rejected loads, if necessary, and sign as “offeror” in Item 15.

## Summary of Discrepancy Management and Load Rejection

This area of the manifest contains important changes in the definition of discrepancy and the management of rejected wastes.

Manifest discrepancies are: (1) significant differences between the quantity (10% in weight for bulk wastes, or any piece count variation for non-bulk wastes) or type of hazardous waste (e.g. solvent instead of acid or toxic constituents not reported on the manifest) designated on the manifest or shipping paper, and the quantity and type of hazardous waste a facility actually receives; (2) rejected wastes, which may be a full or partial shipment of hazardous waste that the TSDF cannot accept; or (3) container residues, which are residues that exceed the quantity limits for RCRA “empty” containers found at 40 CFR 261.7(b). The appropriate discrepancy box must be checked and the discrepancy described in 18(a).

Rejected loads can be: (1) full load rejections; (2) partial load rejections; or (3) residue rejections. If the transporter of a rejected full load is still on-site, the original manifest can be used to reject the load by the TSDF completing Items 18(a) and 18(b). Upon receipt, the alternate facility or generator will sign 18(c). All other rejections require the completion of a new manifest by the TSDF. The new manifest tracking number must be entered in Item 18(b) of the original manifest and original manifest tracking number must be entered in Item 14 of the new manifest. If the TSDF rejects waste after mailing the generator copy of the manifest, the TSDF must amend their copy of the manifest and send a new copy to the generator.

## On-line Resources

EPA commissioned a short on-line training at: <http://www.pneac.org/hazwastemanifest/> (click on the words “Flash Video”).

To view a PDF of the new manifest and for form instructions and other useful information, see: <http://www.epa.gov/epaoswer/hazwaste/gener/manifest/>

To buy new manifest forms, contact any registered forms provider listed at: [www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/printers.htm](http://www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/printers.htm)

*For state-specific information, select your state link from the following web site:* <http://www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/states.htm>