HAZARDOUS WASTE
MANIFEST REVISIONS

Waste Management Meeting
January 19, 2006
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BRIEF HISTORY OF REFORM TRAIL

• Early 80’s: Information requirements, no specific form
  - Variety of State manifest forms, confusion, burden

• 1984: EPA/DOT issue the “Uniform Manifest”
  - Standard Federal data fields & 11 optional state fields
  - Improvement, but still much variability and burden

• Early 90’s: Negotiated Rulemaking Attempt

• May 22, 2001: EPA Issues Proposed Rule
  - Form Revisions & e-Manifest standards
CURRENT STATUS

• Manifest rule was published in the *Federal Register* on March 4, 2005  *(70 FR 10776)*
  – New forms published June 16, 2005 *(70 FR 3504)*
  – Effective date of rule is September 6, 2005
  – Compliance date of rule is September 5, 2006

• The final form revisions rule announced very fundamental changes to the manifest system

• The e-Manifest project is also picking up steam
  – Stakeholder meeting in May, ’04 disclosed strong consensus for national e-manifest system
  – We are making headway on a unique procurement
Manifest Form Revisions
FINAL RULE HIGHLIGHTS

• Fully standardized manifest form

• New process for obtaining manifests and new EPA Registry and precise printing specifications

• Mandatory RCRA waste codes and biennial reporting process codes

• New fields for more precise tracking of rejected wastes, residues, and import/export shipments

• No state variations allowed on the form, but state waste codes will continue

• Phase-in period of 18 months post-publication for printers to become authorized
Fully Standardized Form
What Does It Mean?

✓ The manifest form will look the same since there is a standard Federal format

✓ A 6-copy form will be the national standard

✓ Forms will have 12-character pre-printed tracking #s

✓ A few notable additions:
  – Emergency Response Phone,
  – Generator Site Address,
  – New International Field to track imports/exports, and
  – Expanded discrepancy space for tracking rejected wastes.
Standardization of Management Method Codes

Codes are Standardized with the Hazardous Waste Report Management Method Codes

(i.e., Biennial Report Management Codes)

TSDF Designated on the Manifest is Required to Enter the Codes in Item 19 of the Manifest
**MANAGEMENT METHOD CODES**

Management Method codes describe the type of hazardous waste management system used to treat, recover, or dispose a hazardous waste. Select the final substantive method used. Review the groups and pick the appropriate code.

<table>
<thead>
<tr>
<th>Code</th>
<th>Management Method Code Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>H010</td>
<td>Metals recovery including retorting, smelting, chemical, etc.</td>
</tr>
<tr>
<td>H020</td>
<td>Solvents recovery (distillation, extraction, etc)</td>
</tr>
<tr>
<td>H039</td>
<td>Other recovery or reclamation for reuse including acid regeneration, organics recovery, etc. (specify in comments)</td>
</tr>
<tr>
<td>H050</td>
<td>Energy recovery at this site - used as fuel (includes on-site fuel blending before energy recovery; report only this code)</td>
</tr>
<tr>
<td>H061</td>
<td>Fuel blending prior to energy recovery at another site (waste generated either on site or received from off site)</td>
</tr>
<tr>
<td>H040</td>
<td>Incineration - thermal destruction other than use as a fuel (includes any preparation prior to burning)</td>
</tr>
<tr>
<td>H071</td>
<td>Chemical reduction with or without precipitation (includes any preparation or final processes for consolidation of residuals)</td>
</tr>
<tr>
<td>H073</td>
<td>Cyanide destruction with or without precipitation (includes any preparation or final processes for consolidation of residuals)</td>
</tr>
<tr>
<td>H075</td>
<td>Chemical oxidation (includes any preparation or final processes for consolidation of residuals)</td>
</tr>
<tr>
<td>H076</td>
<td>Wet air oxidation (includes any preparation or final processes for consolidation of residuals)</td>
</tr>
<tr>
<td>H077</td>
<td>Other chemical precipitation with or without pre-treatment (includes processes for consolidation of residuals)</td>
</tr>
<tr>
<td>H081</td>
<td>Biological treatment with or without precipitation (includes any preparation or final processes for consolidation of residuals)</td>
</tr>
<tr>
<td>H082</td>
<td>Adsorption (as the major component of treatment)</td>
</tr>
<tr>
<td>H083</td>
<td>Air or steam stripping (as the major component of treatment)</td>
</tr>
<tr>
<td>H101</td>
<td>Sludge treatment and/or dewatering (as the major component of treatment; not H071-H075, H077, or H082)</td>
</tr>
<tr>
<td>H103</td>
<td>Absorption (as the major component of treatment)</td>
</tr>
<tr>
<td>H111</td>
<td>Stabilization or chemical fixation prior to disposal at another site (as the major component of treatment; not H071-H075, H077, or H082)</td>
</tr>
<tr>
<td>H112</td>
<td>Macro-encapsulation prior to disposal at another site (as the major component of treatment; not reportable as H071-H075, H077, or H082)</td>
</tr>
<tr>
<td>H121</td>
<td>Neutralization only (no other treatment)</td>
</tr>
<tr>
<td>H122</td>
<td>Evaporation (as the major component of treatment; not reportable as H071-H083)</td>
</tr>
<tr>
<td>H123</td>
<td>Settling or clarification (as the major component of treatment; not reportable as H071-H083)</td>
</tr>
<tr>
<td>H124</td>
<td>Phase separation (as the major component of treatment; not reportable as H071-H083)</td>
</tr>
<tr>
<td>H129</td>
<td>Other treatment (specify in comments; not reportable as H071-H124)</td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th>Code</th>
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</thead>
<tbody>
<tr>
<td>H131</td>
<td>Land treatment or application (to include any prior treatment and/or stabilization)</td>
</tr>
<tr>
<td>H132</td>
<td>Landfill or surface impoundment that will be closed as landfill (to include prior treatment and/or stabilization)</td>
</tr>
<tr>
<td>H134</td>
<td>Deepwell or underground injection (with or without treatment; this waste was counted as hazardous waste)</td>
</tr>
<tr>
<td>H135</td>
<td>Discharge to sewer/POTW or NPDES (with prior storage - with or without treatment)</td>
</tr>
<tr>
<td>H141</td>
<td>The site receiving this waste stored/bulked and transferred the waste with no treatment or recovery (H010-H129), fuel blending (H061), or disposal (H131-H135) at that receiving site.</td>
</tr>
</tbody>
</table>
International Shipments

Data requirements and procedures standardized for tracking international hazardous waste shipments

- Added an International Shipments space on the form

- The new space includes:
  1) a check box to indicate an import shipment,
  2) a check box to indicate an export shipment and space for entering the port of exit,
  3) provides space for transporters to indicate the date an export shipment leaves the U.S. and a signature line to attest to it

- New requirement for receiving TSDF to mail final, signed copies of import manifests to the International Compliance Assurance Division in EPA’s Office of Enforcement and Compliance Assurance (OECA)
Rejected Wastes

• Data requirements and procedures standardized for tracking rejected wastes and container residues
  – Discrepancy space expanded to provide check boxes to identify “full” vs. “partial” rejection, or regulated container residue
  – Space to identify material rejected and to provide cross-reference to any subsequent tracking numbers

• General rule is that rejected waste or residue requires a 2\textsuperscript{nd} manifest to be prepared to re-ship waste:
  – Except when full load rejected before any materials received
  – In such case, Alternate Facility space for continued tracking
  – Rejecting TSDF initiates 2nd manifest as “offeror” not generator

• New authority in rule for rejecting TSDF to stage wastes temporarily, and for generators to take back wastes
NEW MANIFEST REGISTRY

• Who can register with EPA to print and distribute the new uniform manifest
  – Waste handlers, states, commercial form printers eligible
  – States no longer exclusive source of blank forms
  – Waste handlers can print own forms and use them anywhere
  – Only forms from registered sources allowed

• EPA is maintaining a registry to oversee the process:
  – Issue and maintain standard printing specifications
  – Define application and review process
  – Maintain list of approved printers for public
  – Provide a link to State program information (e.g., state waste codes or copy submissions)

• Form samples will be reviewed for compliance with printing specifications, legibility, durability, & uniqueness of tracking numbers before becoming registered
PURPOSE OF REGISTRATION

• Through registration and approval, printers will demonstrate that:
  - Forms comply with printing specifications
  - Forms include the standard instructions
  - All copies are labeled and ‘line up’ properly
  - They have controls in place to ensure forms pre-printed with unique 12-character tracking numbers
  - Forms pass legibility and durability tests
REGISTRATION PROCESS

• Registration is a 2-step process:
  Step 1: Initial application submitted –
  - Basic organization information
  - Description of proposed printing operation and scope of distribution
  - Propose 3-character suffix to identify source
REGISTRATION PROCESS (CONT.)

• EPA sends letter approving initial application or requesting modifications.

• If approved, EPA forwards electronic files with formats of the six manifest pages and continuation sheet.
Overview of Registry Application and Review Process

First application component

- Registrant submits application (262.21(b))

- EPA reviews (262.21(c))

- EPA requests more information/modifications (262.21(c))

- EPA approves application (262.2(c)) and provides electronic copy of manifest (262.21(d) and (f))
REGISTRATION PROCESS (CONT.)

• Step 2 – Applicant submits for review three form samples meeting all printing specifications
  - EPA with contractor assistance will perform tests on the samples
  - Within 45 days, EPA will send a letter advising of approval or denial, and reasons for denial (i.e., what tests were failed)
  - If denied, applicant may re-submit new samples
• Once approved, registrants are bound to printing forms in accordance with the samples EPA approved:
  - Approval extends to paper type, paper weights, ink for instructions, carbon/non-carbon materials, and binding methods
  - Legibility and durability are affected by these
  - Applicant must notify EPA if they make any changes from the approved application
Second application component

- Registrant submits three form samples AND description of the form (262.21)

EPA evaluates form samples (262.21(e))

- EPA approves Registrant to print forms (262.21(e))

- EPA disapproves and requests more information/modifications (262.21(e))
REGISTRY GUIDANCE

• EPA has developed 2 sources of guidance:
  – Instruction Document: Instructions for Preparing Application Materials for Submittal to EPA’s Manifest Registry
    • Suggestions for preparing applications and form samples
    • Discussion of Registry tests for compliance with printing specifications
    • Checklists for application and format for reporting test results
REGISTRY GUIDANCE (cont.)

• Manifest Registry Web Page to:
  – Assist organizations in applying to the Registry
  – Provide waste handlers with information for completing the new manifest
  – Assist the public in obtaining manifests from registered sources
REGISTRY WEB PAGE CONTENT

• The web page contains:
  – Instructions Document
  – List of registered printers and contact information
  – Facsimile of the manifest form
  – Frequently Asked Questions (FAQs)
  – Manifest completion and use instructions
  – RCRA waste code lists and management method codes
  – Links to State manifest information (copy submission requirements, State-specific waste codes, and contact information)
Manifest Registry

EPA revised the Hazardous Waste Manifest Forms used to track hazardous waste from a generator’s site to the site of its disposition. Handlers of waste will obtain new forms from any source that has registered with EPA to print and distribute the form. Please note that existing forms must be used until September 4, 2006, and the new Uniform Hazardous Waste Manifest must be used starting on September 5, 2006. This website explains the manifest registry process.

How do I become a registered printer?

- Frequent questions [PDF File, 2 pages, 11 KB, About PDF]
- Instructions for preparing application materials for submittal to EPA's manifest registry - January 2006 [PDF File, 36 pages, 112 KB]
- Approved registered printers

How do I obtain manifest forms from approved vendors?

- Manifest Example: Designated Facility to Destination State [PDF File, 1 page, 93 KB]
- Continuation Sheet Example [PDF File, 1 page, 88 KB]
- Approved registered printers

What guidance is available using the new manifest form?

- Manifest Example: Designated Facility to Destination State [PDF File, 1 page, 93 KB]
- Continuation Sheet Example [PDF File, 1 page, 88 KB]
- Instructions for completing the hazardous waste manifest [PDF File, 10 pages, 1,067 KB]
- Management method codes used with the hazardous waste report [PDF File, 2 pages, 71 KB]
- Links to state regulations

For more information, contact Wanda LeBlu (lebleu.wanda@epa.gov) 703-308-0438.

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APPLICATION STATUS

• To date we’ve received four applications.
• All are undergoing review and we’re working with each to achieve their approval.
• We’ve received many additional inquiries and anticipate a number of additional applications will come in the next two or three months.
Additional Information

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