

HAZARDOUS WASTE MANIFEST REVISIONS

Waste Management Meeting

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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.

UNIFORM HAZARDOUS WASTE MANIFEST		Generator ID Number	1. Page 1 of	2. Emergency Response Phone	4. Manifest Tracking Number	
3. Generator's Name and Mailing Address		Generator's Site Address (if different from mailing address)				
Generator's Phone						
5. Transporter 1 Company Name				U.S. EPA ID Number		
7. Transporter 2 Company Name				U.S. EPA ID Number		
3. Designated Facility Name and Site Address				U.S. EPA ID Number		
Facility's Phone						
GENERATOR	6a.	6b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	
	No.	No.	No.	Type	12. Unit W/L No.	
	1					
	2					
	3					
4						
15. Waste Codes						
74. Special handling instructions and additional information:						
<p>13. GENERATOR/SIGNER'S CERTIFICATION: I hereby declare that the contents of this manifest are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/transported, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If a spot shipment and I am the Primary Exporter, I certify that the contents of this shipment conform to the terms of the attached EPA Acknowledgment of Consent.</p> <p>I certify that the waste minimization statement identified in 40 CFR 260.27(a) (1) is a large quantity generator/ or (2) (1) is a small quantity generator is true.</p>						
Generator/Signer's Printed Name				Signature		
				Month	Day Year	
TRANSPORTER (MTS)	10. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____					
	Transporter signature (for export only): _____ Date leaving U.S.: _____					
	11. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed Name				Signature		
				Month	Day Year	
Transporter 2 Printed Name				Signature		
				Month	Day Year	
DESIGNATED FACILITY	14. Disposal/Reuse					
	16a. Disposal/Reuse Initiative Specified <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	16b. Alternate Facility (if Generator)				Manifest Reference Number	
	Facility's Phone				U.S. EPA ID Number	
	16c. Signature of Alternate Facility (if Generator)				Month Day Year	
13. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.		2.		3.		
16. Designated Facility Owner or Operator: Certification of receipt of hazardous material covered by the manifest except as noted in Part 14a.						
Printed Name				Signature		
				Month	Day Year	

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.

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

Code	Management Method Code Group
Disposal	
H131	Land treatment or application (to include any prior treatment and/or stabilization)
H132	Landfill or surface impoundment that will be closed as landfill (to include prior treatment and/or stabilization)
H134	Deepwell or underground injection (with or without treatment; this waste was counted as hazardous waste)
H135	Discharge to sewer/POTW or NPDES (with prior storage - with or without treatment)
Transfer Off Site	
H141	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.

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 2nd 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 –

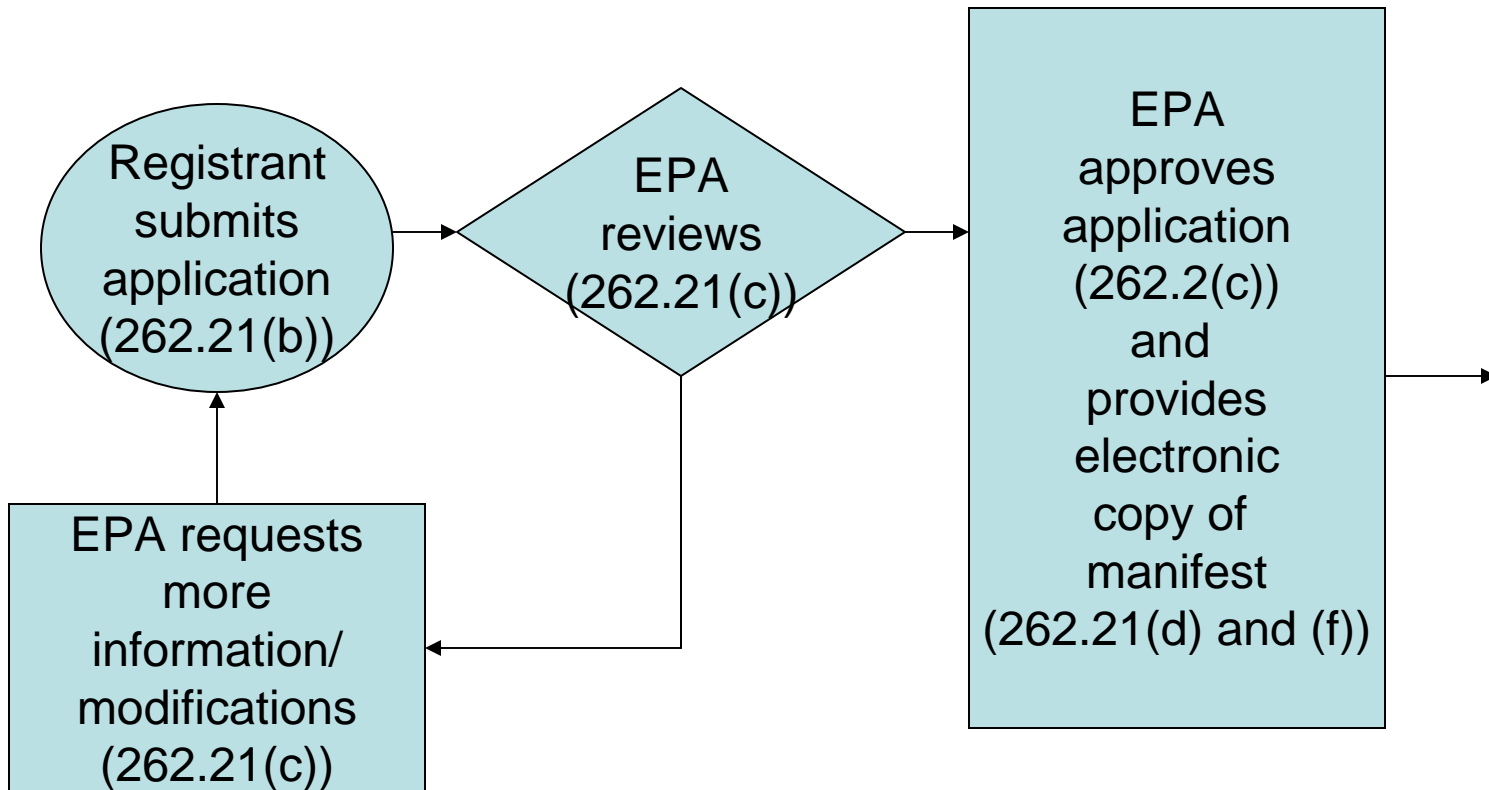
- Basic organization information
- Description of proposed printing operation and scope of distribution
- Propose 3-character suffix to identify source

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



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

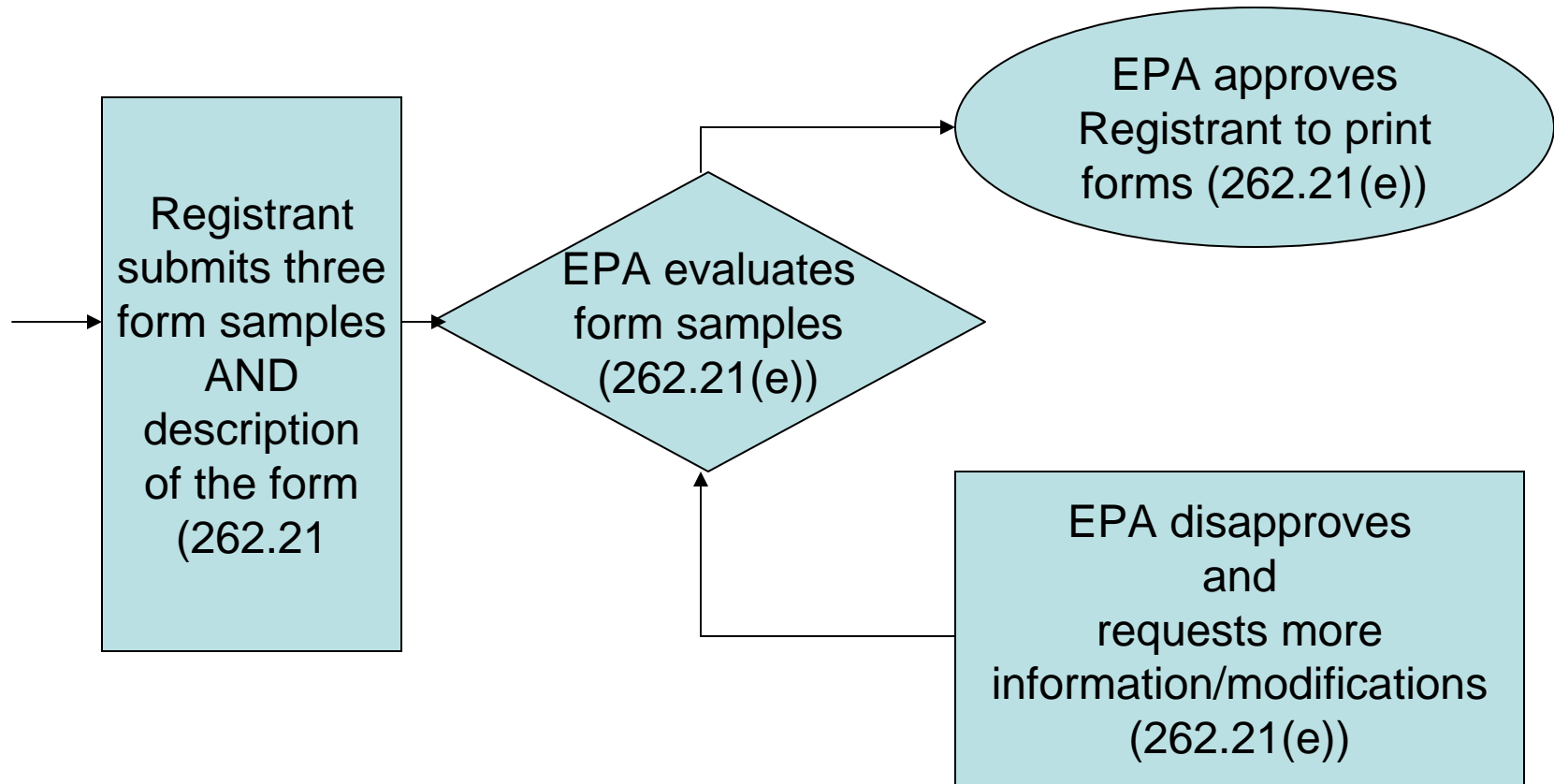
REGISTRATION PROCESS

(cont.)

- 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

Overview of Registry Application and Review Process (continued)

Second application component



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)



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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 web site 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 LeBleu](mailto:lebleu.wanda@epa.gov) (lebleu.wanda@epa.gov) 703-308-0438.

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Last updated on Tuesday, January 10th, 2006

URL: <http://www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/index.htm>

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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