



# In-Depth Manifest Training



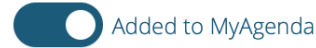
23rd California Unified Program Annual  
Training Conference  
February 2 – March 18, 2021

🕒 3:00 p.m. - 4:00  
p.m. PST

📅 Thursday, February 25

📅 Add to Calendar

## (H-2/25) IN DEPTH MANIFEST TRAINING



Tracks: H, Industry

Less ▼

**OBJECTIVE:** Learn all about the manifest, including both DOT and EPA rules for properly executing the manifest, plus the most common violations.

**DESCRIPTION:** Approximately 50% of all manifests have mistakes on them that could lead to violations for your site. In this class we will learn how to properly fill out a Uniform Hazardous Waste Manifest, including the necessary DOT regulations. We will also learn how to create a DOT basic description and proper shipping name for both RCRA and non-RCRA hazardous waste, plus identify the most common mistakes and how to avoid them.



Primary Presenter  
**Regan Bottomley**  
Consultant  
Environmental Resource Ctr

# Introduction

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- **Andy Smith**
- **More than 20 years training/consulting**
  - **asmith@ercweb.com**
  - **800-537-2372 x 236**



# Learning Objectives (all in 45 minutes!)

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- Learn how to properly execute a manifest
- Understand the necessary DOT rules required for the manifest
- Learn how to construct a DOT proper shipping name for RCRA and non-RCRA hazardous waste
- Identify the most common mistakes and how to avoid them

# Question for chat box

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- I'm a Luddite, don't know how to use the polls, so a simple yes or no in the chat box will have to suffice...
- Did you attend Daniels (Daniel's?) Manifest training on 2/11?
- Are you going to attend CERCLA and Manifest RQs on 3/3?
- Are you going to attend HW Manifest Issues on 3/18?

# Question for chat box

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- If no, we're going over it here. You're in luck.
- If yes...wow, you must LOVE talking about the manifest.



# Manifest Instructions

- Where can you find the manifest instructions?
  - In California, Appendix in 22 CCR 66262

Please print or type

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: VATE17000004

2. Page 1 of 1

3. Emergency Response Phone

4. Manifest Tracking Number

Generator's Site Address (If different than mailing address)

5. Generator's Name

6. Generator's Company Name

7. Generator's Company Name

8. Designated Facility Name and Site Address

9. Designated Facility Name

10. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

11. Containers

12. Total Quantity

13. Waste Codes

14. Special Handling Instructions and Additional Information

15. GENERATOR'S OFFICER'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. I am not aware of any other hazardous materials that are being transported in this container.

16. International Shipments

17. Transporter Acknowledgment of Receipt of Materials

18. Description

19. Alternate Facility (or Generator)

20. Designated Facility Owner or Operator

DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM





# Manifest Instructions

- Where can you find the manifest instructions?
  - Federally (and possibly after CA adopts new rules) no longer in regulations

Please print or type

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: VATE1200004

2. Page 1 of 1

3. Emergency Response Phone

4. Manifest Tracking Number

Generator's Site Address (If different than mailing address)

5. Generator's Name: ABC, Inc. (0123)

6. Generator's U.S. EPA ID Number

7. Transporter 1 Company Name

8. Transporter 1 U.S. EPA ID Number

9. Designated Facility Name and Site Address

10. Designated Facility U.S. EPA ID Number

Facility's Phone

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

12. Containers: No., Type

13. Total Quantity

14. Unit (kg, lbs)

15. Waste Codes

16. Special Handling Instructions and Additional Information

17. GENERATOR'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, and are in full compliance with applicable federal, state and local government regulations. I am not aware of any other hazardous waste material that is being transported with this manifest.

18. Transporter 1 Signature

19. Transporter 2 Signature

20. Designated Facility Signature

21. Designated Facility Name

22. Designated Facility U.S. EPA ID Number

23. Designated Facility Phone

24. Hazardous Waste Report Management Method Code (i.e., code for hazardous waste treatment, disposal, and recycling system)

25. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in Item 16

EPA Form 8700-02 (Rev. 12-11) Previous editions are obsolete. DESIGNATED FACILITY TO EPA's e-Manifest System

# Manifest Instructions

- Where can you find the manifest instructions?
  - Emanifest system
  - Back of paper manifests

Please print or type

UNIFORM HAZARDOUS WASTE MANIFEST VATEST00004

1. Generator ID Number  
2. Page 1 of 1  
3. Emergency Response Phone  
4. Manifest Tracking Number

5. Generator's Site Address (If different than mailing address)

6. Transporter 1 Company Name  
7. Transporter 2 Company Name  
8. Designated Facility Name and Site Address

9. Facility's Phone

10. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

11. Containers  
12. Total Quantity  
13. Waste Codes

14. Special Handling Instructions and Additional Information

15. GENERATOR/SIGNER'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. I accept agreement with the Party Expert. I certify that the contents of the consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste transportation document described in 40 CFR 262.22(c)(1) is a large quantity generator or (30.0) is a small quantity generator and is true.

16. International Shipments  
17. Transporter Acknowledgment of Receipt of Materials

18. Declaration  
19. Alternate Facility (or Generator)  
20. Designated Facility Owner or Operator

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete. DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM



# Manifest Instructions

- Emanifest
  - Same information, just filled out online



Please print or type

Form Approved OMB No. 2000-0039

**UNIFORM HAZARDOUS WASTE MANIFEST** VATES1000004

1. Generator ID Number  
2. Page 1 of 1  
3. Emergency Response Phone  
4. Manifest Tracking Number

Generator's Site Address (If different than mailing address)

5. Transporter 1 Name  
6. U.S. EPA ID Number

7. Transporter 2 Company Name  
8. U.S. EPA ID Number

9. Designated Facility Name and Site Address  
10. U.S. EPA ID Number

Facility's Phone

10. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

11. Containers  
12. Total Quantity  
13. Waste Codes

14. Special Handling Instructions and Additional Information

**GENERATOR'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, and are in full compliance with applicable federal, state and local government regulations. I am not shipping any of the following: (a) any radioactive material as defined in 49 CFR 171.302 (2)(c); (b) any large quantity generator or (c) any small quantity generator as defined in 49 CFR 171.302 (2)(d).

Generator's Printed Name  
Signature  
Month Day Year

16. International Shipments  
Transporter's Signature for exports and  
Transporter's Acknowledgment of Receipt of Materials  
Transporter 1 Printed Name  
Signature  
Month Day Year  
Transporter 2 Printed Name  
Signature  
Month Day Year

18. Dispositions  
18a. Disposition Indication Space  
18b. Alternate Facility (or Generator)  
18c. Signature of Alternate Facility (or Generator)

19. Hazardous Waste Report Management Method Code (i.e., code for hazardous waste treatment, disposal, and recycling system)

20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18b

Facility's Name  
Signature  
Month Day Year

EPA Form 8700-02 (Rev. 12-17) Previous editions are obsolete.

**DESIGNATED FACILITY TO EPA's e-Manifest System**



# Waste Examples from Previous Session

- 4 drums of alcohols and iocane mixture



Please print or type

Form Approved OMB No. 2000-0039

**UNIFORM HAZARDOUS WASTE MANIFEST** 1 Generator ID Number VATEST000004 2 Page 1 of 1 3 Emergency Response Phone 4 Manifest Tracking Number

Generator's Site Address (If different from mailing address)

1. Generator 1 Company Name U.S. EPA ID Number  
2. Generator 2 Company Name U.S. EPA ID Number  
3. Designated Facility Name and Site Address U.S. EPA ID Number

Facility's Phone

6a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) 10 Containers 11. Total 12 Unit 13. Waste Codes  
No. Type Quantity Weight

14. Special Handling Instructions and Additional Information

15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the container are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and administered, and as a full recipient in proper condition for transport according to applicable international and national governmental regulations. I accept shipment and am the Primary Exporter. I certify that the waste transportation document specified in 49 CFR 172.202 (2)(ii) is a large quantity generator or (2)(iii) is a small quantity generator in true.

Generator 1/Officer's Printed Name Signature Month Day Year

16. International Shipments  Report to U.S.  Report from U.S. Port of embarkment Date leaving U.S.

17. Transporter Acknowledgment of Receipt of Materials  
Transporter 1 Printed Name Signature Month Day Year  
Transporter 2 Printed Name Signature Month Day Year

18. Dispositions  
18a. Disposition Indication Space  Quantity  Type  Reuse  Other Rejection  Off Rejection

18b. Alternate Facility (or Generator) Manifest Reference Number U.S. EPA ID Number  
Facility's Phone  
18c. Signature of Alternate Facility (or Generator) Month Day Year

DESIGNATED FACILITY  
19. Hazardous Waste Report Management Method Code (i.e., code for hazardous waste treatment, disposal, and recycling system)  
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest as noted in Item 18a  
Printed Name Signature Month Day Year

EPA Form 8700-02 (Rev. 12-11). Previous editions are obsolete. DESIGNATED FACILITY TO EPA's e-Manifest System

# Plus...

- 1 drum of a non-RCRA HW that is a DOT hazardous material



UN1A2/Y1.3/100/  
21/USA/M1234/2.0

Please print or type

Form Approved OMB No. 2000-0039

**UNIFORM HAZARDOUS WASTE MANIFEST** VATEST000004

1. Generator ID Number  
2. Page 1 of 1  
3. Emergency Response Phone  
4. Manifest Tracking Number

Generator's Site Address (If different than mailing address)

1. Transporter 1 Company Name  
U.S. EPA ID Number

2. Transporter 2 Company Name  
U.S. EPA ID Number

3. Designated Facility Name and Site Address  
U.S. EPA ID Number

Facility's Phone

6. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

No.	Container Type	10. Containers		12. Unit No. (kg)	13. Waste Codes
		Qty.	Type		
1					
2					
3					
4					

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/FORWARDER'S CERTIFICATION:** I hereby declare that the contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. I accept/confirm and/or on the Party's behalf that the waste transportation statement described in 40 CFR 302.22(a)-(f) as a large quantity generator or (30.01) as a small quantity generator is true.

Generator's/Forwarder's Printed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

16. International Shipments:  Report to U.S.  Report from U.S. Port of shipment: \_\_\_\_\_ Date leaving U.S.: \_\_\_\_\_

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Transporter 2 Printed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

18. Designation

19a. Designation Indication Space:  Quantity  Spill  Release  Other Release  Off-Release

19b. Alternate Facility (or Generator): \_\_\_\_\_ Manifest Reference Number: \_\_\_\_\_ U.S. EPA ID Number: \_\_\_\_\_

Facility's Phone: \_\_\_\_\_

19c. Signature of Alternate Facility (or Generator): \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

20. Designated Facility Name or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 19c

Printed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

EPA Form 8700-02 (Rev. 12-11). Previous editions are obsolete. **DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM**

# Plus...

- 1 drum of a non-RCRA HW that is NOT a DOT hazardous material



Please print or type

Form Approved OMB No. 2000-0039

**UNIFORM HAZARDOUS WASTE MANIFEST** VATEST000004

1. Generator ID Number  
2. Page 1 of 1  
3. Emergency Response Phone  
4. Manifest Tracking Number

Generator's Site Address (If different than mailing address)

1. Generator 1 Name  
2. Generator 1 Company Name  
3. Designated Facility Name and Site Address

U.S. EPA ID Number  
U.S. EPA ID Number  
U.S. EPA ID Number

Facility's Phone

10. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

No.	Container Type	11. Containers		12. Unit No. (s)	13. Waste Codes
		Qty.	Type		
1					
2					
3					
4					

14. Special Handling Instructions and Additional Information

**15. GENERATOR'S/FORWARDER'S CERTIFICATION:** I hereby declare that the contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, and are in a fit condition for transport according to applicable international and national governmental regulations. I accept agreement with the Shipping Expert. I certify that the contents of the consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste transportation document described in 40 CFR 302.22(a)-(f) is a large quantity generator or (30.01) or a small quantity generator is true.

Generator's/Forwarder's Printed Name  
Signature  
Month Day Year

**16. International Shipments**  Report to U.S.  Report from U.S. Port of embarkment Date leaving U.S.

Transporter signature for exports and  
17. Transporter Acknowledgment of Receipt of Materials  
Transporter 1 Printed Name  
Signature  
Month Day Year  
Transporter 2 Printed Name  
Signature  
Month Day Year

**18. Dispositions**  
18a. Disposition Indication Space  Quantity  Spill  Release  Other Rejection  Full Rejection

18b. Alternate Facility (or Generator)  
18c. Signature of Alternate Facility (or Generator)

Month Day Year

18. Hazardous Waste Report Management Method Code (i.e., code for hazardous waste treatment, disposal, and recycling system)

19. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a  
Printed Name  
Signature  
Month Day Year

EPA Form 8700-02 (Rev. 12-17). Previous editions are obsolete. **DESIGNATED FACILITY TO EPA's e-Manifest System**

# Top Third of Manifest

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## ➤ Generator, Transporter, Designated Facility Information

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)	
	Generator's Phone:			
	6. Transporter 1 Company Name			U.S. EPA ID Number
	7. Transporter 2 Company Name			U.S. EPA ID Number
	8. Designated Facility Name and Site Address			U.S. EPA ID Number
	Facility's Phone:			

# Blocks 1, 2, 4, 5

- ID number, Name, Address, Phone Number
- Manifest Tracking Number
- Page 1 of ...

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number CAD123456789	2. Page 1 of 1	3. Emergency Response Phone	4. Manifest Tracking Number 123456789ERC
	5. Generator's Name and Mailing Address Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987 Generator's Phone: 800-537-2382		Generator's Site Address (if different than mailing address)	
6. Transporter 1 Company Name			U.S. EPA ID Number	
7. Transporter 2 Company Name			U.S. EPA ID Number	
8. Designated Facility Name and Site Address			U.S. EPA ID Number	
Facility's Phone:				



# Block 5

- If Mailing address not Site Address, add Site Address

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number CAD123456789	2. Page 1 of 1	3. Emergency Response Phone	4. Manifest Tracking Number 123456789ERC
	5. Generator's Name and Mailing Address Miracle Max's Apothecary PO Box 1987 Guilder, CA 90210-1987		Generator's Site Address (if different than mailing address) Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987	
	Generator's Phone: 800-537-2382			
	6. Transporter 1 Company Name		U.S. EPA ID Number	
	7. Transporter 2 Company Name		U.S. EPA ID Number	
8. Designated Facility Name and Site Address		U.S. EPA ID Number		
Facility's Phone:				

# Block 3

- 24-hour Emergency Response Telephone Number
  - DOT requirement
  - Include contract number if outside provider

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number CAD123456789	2. Page 1 of 1	3. Emergency Response Phone 1-800-537-2382	4. Manifest Tracking Number 123456789ERC
	5. Generator's Name and Mailing Address Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987 Generator's Phone: 800-537-2382		Generator's Site Address (if different than mailing address) Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987	
6. Transporter 1 Company Name			U.S. EPA ID Number	
7. Transporter 2 Company Name			U.S. EPA ID Number	
8. Designated Facility Name and Site Address			U.S. EPA ID Number	
Facility's Phone:				

# 24-hour Emergency Response Number

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## ➤ 49 CFR 172.604

- The name of the person, or **contract number** or other unique identifier assigned by an ERI provider, identified with the emergency response telephone number must be entered on the shipping paper immediately before, after, above, or below the emergency response telephone number **unless the name is entered elsewhere on the shipping paper**

# Block 6 Transporter 1

## ➤ Company Name and ID number

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number CAD123456789	2. Page 1 of 1	3. Emergency Response Phone 1-800-867-5309 Contract #: 123	4. Manifest Tracking Number 123456789ERC
	5. Generator's Name and Mailing Address Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987 Generator's Phone: 800-537-2382		Generator's Site Address (if different than mailing address) Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987	
6. Transporter 1 Company Name Humperdink's Hauling Company			U.S. EPA ID Number CAT123456789	
7. Transporter 2 Company Name			U.S. EPA ID Number	
8. Designated Facility Name and Site Address			U.S. EPA ID Number	
Facility's Phone:				

# Block 7 Transporter 2

- Different Company, **not** Different Driver
- Company Name and ID number

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number CAD123456789	2. Page 1 of 1	3. Emergency Response Phone 1-800-867-5309 Contract #: 123	4. Manifest Tracking Number 123456789ERC
	5. Generator's Name and Mailing Address Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987 Generator's Phone: 800-537-2382		Generator's Site Address (if different than mailing address) Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987	
	6. Transporter 1 Company Name Humperdink's Hauling Company			U.S. EPA ID Number CAT123456789
	7. Transporter 2 Company Name Fezzik's Freight			U.S. EPA ID Number CAT023456789
	8. Designated Facility Name and Site Address Facility's Phone:			U.S. EPA ID Number

# Block 8 Designated Facility

- Name, Site Address
- Phone Number
- EPA ID Number

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number CAD123456789	2. Page 1 of 1	3. Emergency Response Phone 1-800-867-5309 Contract #: 123	4. Manifest Tracking Number 123456789ERC
	5. Generator's Name and Mailing Address Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987 Generator's Phone: 800-537-2382		Generator's Site Address (if different than mailing address) Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987	
6. Transporter 1 Company Name Humperdinck's Hauling Company			U.S. EPA ID Number CAT123456789	
7. Transporter 2 Company Name Fezzik's Freight			U.S. EPA ID Number CAT023456789	
8. Designated Facility Name and Site Address Inigo's Incinerator 456 Castle Lane Floren, UT 84029 Facility Phone: 800-283-2735			U.S. EPA ID Number UTD023456789	

# Middle Third of Manifest

- Mostly DOT
- Waste Codes

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes		
		Number	Type					
	1.							
	2.							
	3.							
	4.							

# 9a, X or RQ

- X if a DOT regulated hazardous material

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes		
		Number	Type					
X	1. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s. (iocane, alcohols), 6.1, II	4	DM	100	P	D001	212	
	2.							
	3.							
	4.							



# 9a, X or RQ

- RQ if a single package exceeds reportable quantity

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes		
		Number	Type					
X	1. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s. (iocane, alcohols), 6.1, II	4	DM	100	P	D001	212	
RQ	2. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s. (iocane, alcohols), 6.1, II (D001)	1	DM	400	P	D001	212	
	3.							
	4.							

# 9a, X or RQ

- RQ if a single package exceeds reportable quantity
  - Either before or after US DOT description

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes		
		Number	Type					
X	1. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s. (iocane, alcohols), 6.1, II	4	DM	100	P	D001	212	
RQ	2. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s. (iocane, alcohols), 6.1, II (D001)	4	DM	1600	P	D001	212	
X	3. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s. (iocane, alcohols), 6.1, II, RQ (D001)	4	DM	1600	P	D001	212	
	4.							

# RQ mistakes

- Incorrect, or omitted, RQs is very common
  - D002 reportable quantity is 100 lbs
  - D007 RQ is 10 lbs

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. UN2796, WASTE SULFURIC ACID, 8, PG II	001	TP	2950	P	D002	D007	
X	2. NA3082, HAZARDOUS WASTE, LIQUID, N.O.S., (D007), 9, PG III	003	TP	7134	P	D007		

# RQ mistakes

- Before or after basic description
  - NOT in between elements of basic description
  - AND...
    - RQ for D001 is 100 lbs
    - RQ for D035 is 5000 lbs
    - This is only a 30 lb container, so RQ not required AND in wrong location

X	1.	UN1993, RQ, Waste Flammable liquids, n.o.s., (Paint, Methyl Ethyl Ketone) 3, II, (RQ=100lbs), ERG# 128	01	DM	30	P	D001	D035	
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# RQ mistakes

- Before or after basic description
  - RQ for D001 is 100 lbs
  - 3000 gallon container probably exceeds this

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. UN1863, WASTE FUEL, AVIATION, TURBINE ENGINE, 3, PG III	01	TT	3000	G	D001	343	

# 49 CFR 172.203 (c)

- If the material contains two or more hazardous substances, at least two hazardous substances, including **the two with the lowest reportable quantities (RQs)**, must be identified. For a hazardous waste, the waste code (e.g., D001), if appropriate, may be used to identify the hazardous substance.

3.	RQ, UN2810, RQ, WASTE TOXIC LIQUID, ORGANIC, N.O.S., 6.1, PGIII, (MONOETHANOLAMINE)	4	TP	1200 G	D007	D010	
X							
4.							

- Which are the two lowest RQs?
  - MEA RQ = 100 lbs
  - **D007 RQ = 10 lbs**
  - **D010 RQ = 10 lbs**

# 49 CFR 172.203(k) - Generic PSNs

- If a material is described on a shipping paper by one of the proper shipping names identified by the letter “G” in column (1) of the §172.101 Table, the technical name of the hazardous material must be entered in parentheses in association with the basic description.

3.	RQ, UN2810, RQ, WASTE TOXIC LIQUID, ORGANIC, N.O.S., 6.1, PGIII, (MONOETHANOLAMINE)	4	TP	1206G	D007	D010	
X							

- MEA is added correctly, but not the RQs
  - Including waste codes at far right does not count

# 49 CFR 172.202(b) - Sequence of Information

- ID Number, Proper Shipping Name, Hazard Class (subsidiary hazard, if any, in parenthesis), and Packing Group, if any

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	R6, Waste Corrosive Liquid, Basic, Inorganic, N.O.S., (Copper Tetramine Dichloride), 8, UN3266, PG II (D004)	0021	DF	11597	P	D002	D004	D010

- Wrong sequence



# 49 CFR 172.202(b) - Sequence of Information

- ID Number, Proper Shipping Name, Hazard Class (subsidiary hazard, if any, in parenthesis), and Packing Group, if any

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type			D001	D002
X	1. UN3489, Waste Paint, Flammable, Corrosive  3, PG II      ERG #132      1989-6	001	DF	00100	P		
	2.						

- Missing subsidiary hazard (8) in parenthesis following primary hazard (3)

# What about Non-RCRA Haz Wastes?

- If it meets DOT definition of hazardous material, still follow all DOT rules (don't add "waste" to PSN)

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes		
		Number	Type					
RQ	1. UN 2315, Polychlorinated biphenyls, liquid, 9, II	1	DM	100	P	261		
	2.							
	3.							
	4.							

# PCBs

- DOT only regulates  $\geq$  RQ (1 lb); for ground, change PG II to III
- TSCA wants kgs, not lbs (40 CFR 761)

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes		
		Number	Type					
RQ	1. UN 2315, Polychlorinated biphenyls, liquid, 9, III	1	DM	10	kg	261		
	2.							
	3.							
	4.							

# Asbestos

- DOT only regulates  $\geq$  RQ (1 lb)

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes		
		Number	Type					
RQ	1. NA 2212, Asbestos, 9, III	1	DM	100	P	151		
	2.							
	3.							
	4.							

# What about Non-RCRA Haz Wastes?

- If it does NOT meet a DOT hazmat definition, use generic description or, when possible, Appendix X name

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes		
		Number	Type					
	1. Tanning sludge, non-RCRA hazardous waste, solid	1	DM	100	P	491		
	2.							
	3.							
	4.							

# All Together Now...

- RQ if a single package exceeds reportable quantity

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes		
		Number	Type					
X	1. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s. (iocane, alcohols), 6.1, II RQ (D001)	4	DM	1600	P	D001	212	
RQ	2. UN 2345, Polychlorinated biphenyls, 9, III	1	DM	10	KG	261		
	3. Tanning sludge, non-RCRA hazardous waste, solid	1	DM	100	KG	491		
	4.							

# Before you sign...

- Read the fine print
- I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations....

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.  
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name	Signature	Month	Day	Year



# Any Questions?

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