

# HAZARDOUS WASTE MANIFEST ISSUES IN CALIFORNIA

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Compliance Notebook

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**Hazardous Waste Manifest Issues in California**



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**The Electronic Manifest (e-Manifest)**



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**Why an e-Manifest?**

The e-manifest was mandated by Congress

On January 3, 2012, Congress passed the "Hazardous Waste Electronic Manifest Establishment Act"

- Amended the Solid Waste Disposal Act



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 **Benefits of an e-Manifest**

An electronic manifest (e-manifest) has benefits over a physical copy:

- The ability for users to track shipments in real time
- More timely and higher-quality data
- Cost savings
- Paperwork reduction
- "One-stop" manifest copy submission to the EPA and all interested states



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 **Requirement to Use an e-Manifest**

In the beginning, the e-manifest is voluntary for generators of hazardous waste

- Generators may continue to use paper manifests



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 **Requirement to Use an e-Manifest**

"Receiving facilities" (typically the TSDF) are required to input data into the e-manifest database

- If paper manifests are used, their data still needs to be uploaded



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 **History of the e-Manifest**

- May 22, 2001 = initial proposal by the EPA
- February 7, 2014 = final rule approving the use of e-manifests
- January 3, 2018 = Fee rulemaking and amendments to the original e-manifest rule
- June 30, 2018 = e-manifest system went live



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 **How Does the e-Manifest Database Work?**

The EPA requires all e-manifests to be submitted to "RCRAInfo"

- RCRAInfo is an existing online portal that is already used for biennial reports and site notifications in some states

<https://rcrainfo.epa.gov/>



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 **RCRAInfo**



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### Who Can Use RCRAInfo?

All regulated persons can access and enter information into the e-manifest database at RCRAInfo, including:

- Generators
- Transporters
- Treatment, storage, and disposal facilities (TSDFs)



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### Who Can Use RCRAInfo?

- Others filling out manifests on behalf of a company (e.g., brokers) are able to gain access as well
- Handlers *must* register to be able to submit electronically as well as make corrections



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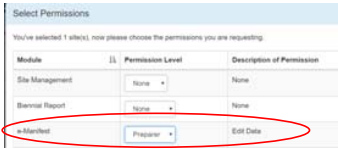
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### Different User Access

When registering at RCRAInfo, an individual can be a:

- Site manager
- Viewer (can only view the content)
- Preparer (can fill out the manifest but cannot sign)
- Certifier (can actually sign the manifest)



Module	Permission Level	Description of Permission
Site Management	None	None
Biennial Report	None	None
e-Manifest	Preparer	Self Date

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**Different User Access**

Individuals who will sign the e-manifest must go through a validation to provide e-signatures

- Accounts are per individual and cannot be shared
- Generators and transporters can use "quick sign" function
- Receiving facilities must use a CROMERR signature



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**Site Managers**

- Site managers play a crucial role on the RCRAInfo site
  - Can assign roles to employees within the same company (e.g., viewer, preparer, certifier) over multiple sites
- The EPA is advising that companies have two or more site managers



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**RCRAInfo Registration**



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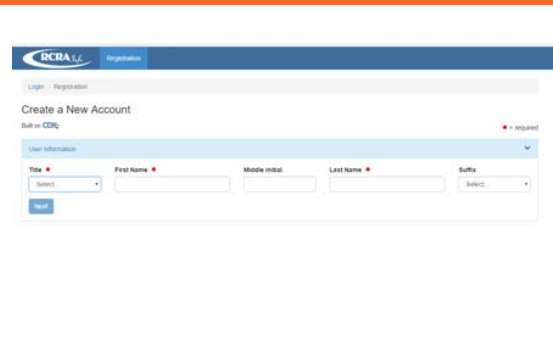
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 **RCRAInfo Registration**



The screenshot shows the RCRAInfo registration page. At the top, there is a navigation bar with the RCRAInfo logo and the text 'RCRAInfo Registration'. Below this, there is a 'Create a New Account' section. The form includes fields for 'Title', 'First Name', 'Middle Initial', 'Last Name', and 'Suffix'. Each field has a dropdown menu for selection. A 'Next' button is located at the bottom left of the form. The page number '16' and copyright information '© Lion Technology Inc. 22-0331' are visible at the bottom.

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 **Submitting e-Manifests**

- Once entered into the system, each regulated person (generator, transporter, TSDF) has access to the e-manifest
  - Must be registered user at RCRAInfo
- e-Manifests can be saved and altered at later dates



The image shows a man in a light blue shirt sitting at a desk, looking at a laptop. He is holding a pen and a document, suggesting he is working on a manifest.

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 **EPA ID Numbers**

- To use the e-manifest system, receiving facilities (e.g., TSDFs) *must* have an EPA ID number
- Generators and transporters will need an EPA ID number if they want to *sign* the e-manifest
  - Can still do other functions without an ID number



The image shows a document with the text 'EPA Identification Number' written on it. A pair of glasses and a pen are resting on the document.

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RCRA e-Manifest interface showing the 'My Sites' section. The page title is 'Logging on to e-Manifest'. The navigation bar includes Home, Reports/Extracts, Documentation, and Feedback/Report an Issue. The 'My Sites' section displays a table with the following data:

Site ID	Site Name	Address	City	State	County	Permission	Status
VAD00052119	TEST T3DF OF VA	123 MAIN ST	ARLINGTON	VA	ARLINGTON	Active	Active

Buttons for 'Select Existing Site' and 'Request New Site ID' are visible. The footer shows page number 19 and copyright information for Lion Technology Inc. (22-0331).

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RCRA e-Manifest interface showing the 'Site Details' page for 'TEST T3DF OF VA'. The page title is 'Logging on to e-Manifest'. The site details include:

- Site Name: TEST T3DF OF VA
- Address: 123 MAIN ST - ARLINGTON
- Site ID: VAD00052119
- Site Details: e-Manifest, WETS
- General Overview: Federal Generator Status (Large Quantity Generator), State Generator Status (Large Quantity Generator), Is Site Active (Yes), Date Last Updated (06/26/2019)
- Site Mailing Address: 123 MAIN ST, ARLINGTON, VA 22202
- Site Contact: JOAN Q TESTER, 123 MAIN ST, ARLINGTON, VA 22202

A map of the location is also displayed. The footer shows page number 20 and copyright information for Lion Technology Inc. (22-0331).

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RCRA e-Manifest interface showing the 'Manifest Tracking' page. The page title is 'Logging on to e-Manifest'. The page displays a table of manifest entries:

Manifest ID#	Generator ID	Generator Name	Last Updated Date	Status	Actions
100030432ELC	VAD00052119	TEST T3DF OF VA	07/19/2020 01:51 PM	Scheduled	
1000304176ELC	VATEST000004	TEST GENERATOR OF VA	07/10/2020 01:21 PM	Scheduled	
100030296ELC	VAD00052119	TEST T3DF OF VA	07/09/2020 04:41 PM	Scheduled	
100030418ELC	VATEST000004	TEST GENERATOR OF VA	07/09/2020 02:37 PM	Scheduled	
100030391ELC	PA0022030165	EAST PENN MANUFACTURING CO INC	06/29/2020 11:58 AM	Scheduled	

The 'Create New Manifest' button is highlighted with a red circle. The footer shows page number 21 and copyright information for Lion Technology Inc. (22-0331).

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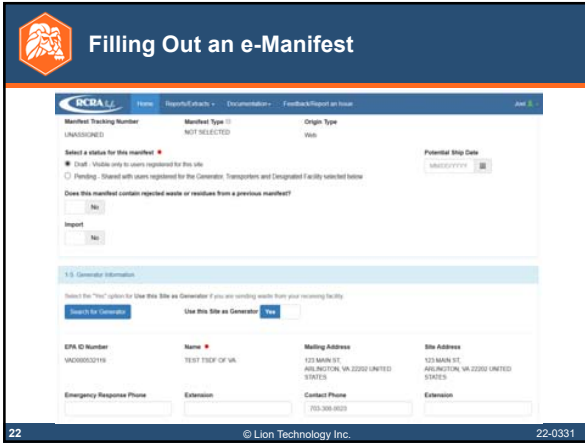
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**Filling Out an e-Manifest**

RCRA Home Reports/Extracts Documents Feedback/Report an Issue

Manifest Tracking Number: UNASSIGNED    Manifest Type ID: NOT SELECTED    Origin Type: Yes

Select a status for this manifest:

- Draft - Visible only to users registered for this site
- Pending - Shared with users registered for the Generator, Transporter and Designated Facility selected below

Does this manifest contain rejected waste or residues from a previous manifest?

Import:  No

U.S. Generator Information

Indicate the "Test" option for Use this Site as Generator if you are sending waste from your receiving facility.

Search for Companies    Use this Site as Generator:  Yes

EPA ID Number: W000000216	Name: TEST TEST OF VA	Mailing Address: 222 MARKET AVENUE, ARLINGTON, VA 22202 UNITED STATES	Site Address: 222 MARKET AVENUE, ARLINGTON, VA 22202 UNITED STATES
Emergency Response Phone:	Extension:	Contact Phone: (703) 508-9833	Extension:

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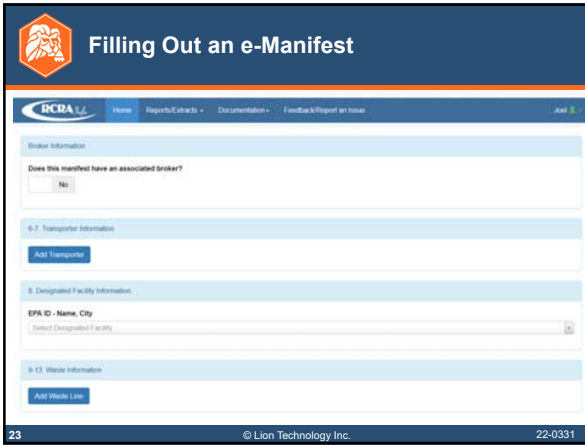
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**Filling Out an e-Manifest**

RCRA Home Reports/Extracts Documents Feedback/Report an Issue

Broken Information

Does this manifest have an associated broker?

No

8.7 Transporter Information

Add Transporter

8. Designated Facility Information

EPA ID - Name, City

Select Designated Facility

8.13 Waste Information

Add Waste Line

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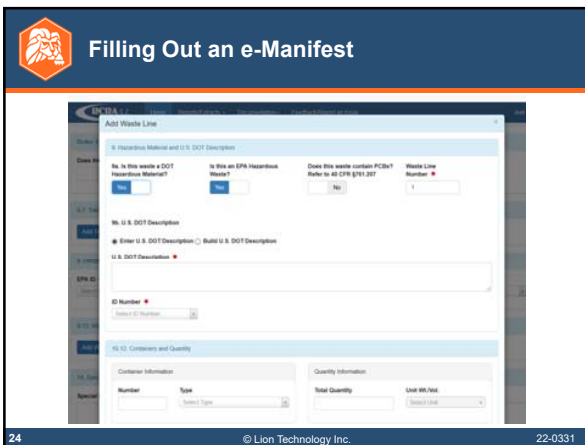
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**Filling Out an e-Manifest**

RCRA Home Reports/Extracts Documents Feedback/Report an Issue

Add Waste Line

8. Hazardous Material and U.S. DOT Description

Is this waste a DOT Hazardous Material?	Is this an EPA Hazardous Waste?	Does this waste contain PCBs?	Waste Line Number
<input type="checkbox"/> No	<input type="checkbox"/> No	<input type="checkbox"/> No	1

8. U.S. DOT Description

Enter U.S. DOT Description or Build U.S. DOT Description

U.S. DOT Description

EPA ID

ID Number

Product ID Number

8.12 Containers and Quantity

Container Information		Quantity Information	
Number	Type	Total Quantity	Unit (M, Y, K)
	Select Type		Select Unit

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### Filling Out an e-Manifest

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**Filling Out an e-Manifest**

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**Filling Out an e-Manifest**

Line Number	HWM	U.S. DOT Description	Containers	Type	Total Quantity	Units	Waste Codes	Management Method Code	Action
1	X	UN2800, Waste Pharmaceutical Preps n.o.s., (Poisons, Xn/Cor), 3, 8, 9, 10	10	DM	500	0	0001, 0006, F100, 212		

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**e-Manifest Responsibilities**

“Receiving facilities” are required to submit e-manifests to the EPA

- Typically, this is the TSDf the generator sends the waste to (as assigned in Box 8 of the manifest)
- This could also be an alternate destination facility

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**Submitting the e-Manifest**

Receiving facilities have three ways to submit manifests to the EPA:

1. Direct input through RCRAInfo
2. Uploading manifest data from an industry system
3. Submitting pdf copies

*Receiving facilities can no longer mail in paper copies as of June 2021*

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**Submitting the e-Manifest**

Paper uploads can be done individually or as a batch, but require CROMERR certification



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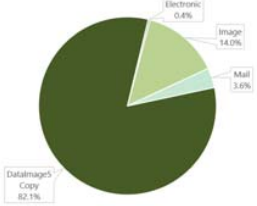
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**Manifest Submission Breakdown**

As of January 24, 2022, 6.37 million manifests have been submitted to the EPA:

1. Data + image: 5,231,281
2. Image only: 890,601
3. Mail: 227,206
4. Electronic: 22,798



Source: EPA's January e-manifest webinar

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 **e-Manifest Responsibilities**

Generators and transporters have limited responsibility under the e-manifest rules

- Generators will likely fill out the top of the manifest
- Both may need to print out a copy for transportation purposes



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 **Do I Have to Use an e-Manifest?**

At this time, generators can still choose to use an e-manifest or an actual paper copy manifest

- EPA strongly encourages the use of an e-manifest!



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 **Do I Have to Use an e-Manifest?**

- There is no difference in how the electronic vs. paper forms are filled out, as they require the same information
- When using paper manifests, they must still be obtained from registered manifest printers



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 **Why Switch to the e-Manifest**

Using an e-manifest rather than a paper copy has benefits:

- Less expensive fees
- Better ability to share info with downstream users



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 **Why Switch to the e-Manifest**

Using an e-manifest rather than a paper copy has benefits:

- Paper manifests will eventually be phased out
  - EPA's goal was for generators to switch to electronic within five years (June 2023)
  - However, with little adoption, no specific timeline for when generators must use e-manifests
- Satisfies the recordkeeping retention requirement for the EPA with less paperwork to file away

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 **Changes to Paper Copies**

If using paper copies of the manifest, the shipment must include multiple copies

- Originally, manifests had to have six copies in total (each copy given to a different regulated entity)

Old Rules	New Rules
Page 1 (top copy): "Designated facility to consignment state" (if required);	Page 1 (top copy): "Designated facility to EPA's e-Manifest system";
Page 2: "Designated facility to generator state" (if required);	Page 2: "Designated facility to generator";
Page 3: "Designated facility to generator";	Page 3: "Designated facility copy";
Page 4: "Designated facility copy";	Page 4: "Transporter copy"; and,
Page 5: "Transporter copy"; and	Page 5 (bottom copy): "Generator's initial copy."
Page 6 (bottom copy): "Generator's initial copy."	

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**Changes to Paper Copies**

Since the last two copies of the manifest used to be sent to State authorities (and will now be accessed via the e-manifest database), one copy can cover two states

- Five copies in total now needed for paper manifests

Old Rules	New Rules
Page 1 (top copy): "Designated facility to consignment state" (if required);	Page 1 (top copy): "Designated facility to EPA's e-Manifest system";
Page 2: "Designated facility to generator state" (if required);	Page 2: "Designated facility to generator";
Page 3: "Designated facility to generator";	Page 3: "Designated facility copy";
Page 4: "Designated facility copy";	Page 4: "Transporter copy"; and,
Page 5: "Transporter copy"; and	Page 5 (bottom copy): "Generator's initial copy;"
Page 6 (bottom copy): "Generator's initial copy;"	

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**What Is a "Hybrid" Manifest?**

To help bridge paper manifests to electronic manifests, generators/transporters can utilize "hybrid" manifests

- Paper manifest is created and signed by the generator and initial transporter, which generator retains a copy
- The initial transporter and subsequent handlers then process the remainder of the transaction electronically

*Generators would still need to register with e-Manifest to view their TSDf-signed copies or make special arrangements with the TSDf to obtain a paper copy*

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**State Adoption of e-Manifest**

- States **MUST** revise their programs to align with the new e-manifest rules
  - E-manifest requirements became effective in all states on the same date (June 30, 2018)
- RCRAInfo system has State user functionality



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 **State Adoption of e-Manifest**

- State-specific wastes that require manifests must still be submitted by the receiving facility to the EPA
  - States will then access these manifests through the new database
- States must use the e-manifest system, but they can also collect paper copies from generators *in addition* to the e-manifest
  - California still requires this!



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 **Import/Export Shipments**

- Receiving facilities of import shipments must submit them to the new e-manifest database
- Export shipments are not subject to the new submission rules
  - EPA plans on expanding applicability in the next rule update



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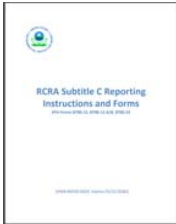
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 **RCRA Biennial Report**

- EPA's long-term goal is to integrate the RCRA biennial report with the new e-manifest system
  - Not ready to take this step yet, so biennial reports will still be submitted separately from e-manifests
  - Integration will be phased in over time, but no specific timeframe yet



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### Can I Use an e-Manifest for PCB Shipments?

- Under the Toxic Substances and Control Act (TSCA), the EPA requires PCBs to be shipped using a manifest
- The EPA will allow PCBs to be shipped using e-manifests
  - “Receiving facilities” are still required to pay submission fees



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### Will e-Manifest Affect LDR Paperwork?

The e-manifest system does *not* affect the LDR paperwork that must be submitted to your TSDF

- Continue with the same protocol you have been following



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### EPA vs. DOT Requirements

The Department of Transportation (DOT) still requires a physical shipping paper to accompany hazmat shipments

- Still need a hard copy of the manifest to accompany the shipment
- Could have single-page printout if using e-manifest, as opposed to five copies if still using paper manifests



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 **EPA vs. DOT Requirements**

The EPA and DOT are in talks to discuss changes in the future





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 **DOT Shipping Documents**

- Since both generators and transporters have access to RCRAInfo, either can print the manifest as the physical copy
  - Generators and transporters should discuss who will do this
- The DOT allows electronic copies to satisfy its record retention requirements



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 **Who's Paying for This?**

- "Receiving facilities" are required to pay all filing fees associated with submitting the e-manifest
- Although not required by the EPA, filing costs will likely be passed along to generators by their TSDFs



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 **Submission Fees**

A submission fee will apply “per manifest”

- The amount owed will vary depending on the “difficulty” of the EPA to process the manifest
- Fees for 2022–2023 are as follows:

Manifest Submission Type	Fee per Manifest
Scanned Image Upload	\$20.00
Data + Image Upload	\$13.00
Electronic Manifest (Fully Electronic and Hybrid)	\$8.00

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 **Submission Fees**

- The EPA will revise the fee schedules at two-year intervals
- The fee schedule will be published on the EPA’s e-manifest program website by July 1 of each odd-numbered calendar year.



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 **Submission Fees**

The revised fees will cover the two fiscal years beginning on October 1 of that year and ending on September 30 of the next odd-numbered year

- Second year will be subject to an inflation adjuster



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 **Availability to Public**

As part of the e-manifest system, any e-manifests submitted will be available to the public 90 days post-receipt



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 **Changes to 40 CFR 262**

The EPA eliminated the following from the *Code of Federal Regulations*, which were previously found at 40 CFR 262, Appendix:

- The manifest instructions
- Sample forms (including continuation sheet)

*Can still access instructions at the e-manifest website*



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 **e-Manifest Website**

EPA has a dedicated website for e-manifests

- Can use to track the status of the program
- Can join the e-manifest listserv to keep up-to-date on all things e-manifest and join EPA webinars

*Website also has helpful FAQ pages*



[www.epa.gov/e-manifest](http://www.epa.gov/e-manifest)

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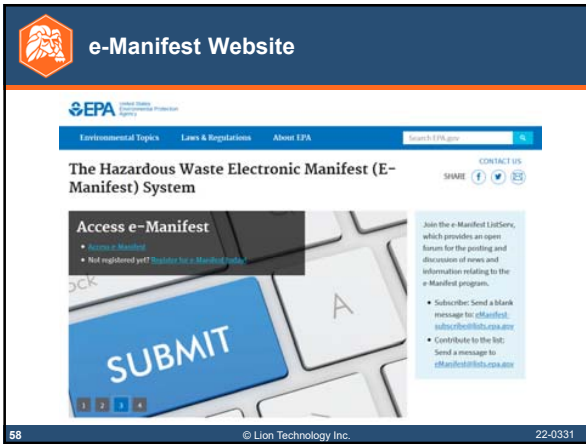
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**e-Manifest Website**



The screenshot shows the EPA website interface. At the top, there's a navigation bar with 'Environmental Topics', 'Laws & Regulations', and 'About EPA'. Below that, the main heading is 'The Hazardous Waste Electronic Manifest (E-Manifest) System'. A section titled 'Access e-Manifest' lists two bullet points: '• Access e-Manifest' and '• Not registered yet? Register for e-Manifest here'. To the right, there's a 'Join the e-Manifest Listserv' section with a description and three bullet points: '• Subscriber: Send a blank message for eManifest: [subscribe@hwtls.epa.gov](mailto:subscribe@hwtls.epa.gov)', '• Contribute to the list: Send a message to [eManifest@hwtls.epa.gov](mailto:eManifest@hwtls.epa.gov)', and '• Subscriber: Send a blank message for eManifest: [subscribe@hwtls.epa.gov](mailto:subscribe@hwtls.epa.gov)'. A 'SUBMIT' button is visible on a keyboard in the background image.

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**Completing the Manifest**



The photograph shows a storage area with several large drums. There are three blue drums in the foreground and several black drums behind them. The drums are stacked on a pallet. The background shows a white wall and a wooden shelf.

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**Shipping Waste Off Site**  
**What's It All About?**

Generators are not allowed to accumulate their hazardous waste for an unlimited amount of time and therefore must manage two regulatory program requirements



The photograph shows a blue semi-truck with a white trailer parked in front of a building. The truck is facing right. The building has a large open bay door.

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 **Completing the Manifest**  
What You Need to Know

- The hazardous waste's properties
- The site's EPA ID number
- How the waste will be packaged
- Who will be transporting the waste
- Who the TSDF is that will receive the waste



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 **Is It a Hazardous Material?**  
Hazardous Wastes vs. Hazardous Materials

- The DOT includes in its definition of "hazardous material" anything that meets the DOT definition of a "hazardous waste"
- A DOT hazardous waste is "any material that is subject to the Hazardous Waste Manifest Requirements of the US Environmental Protection Agency specified in 40 CFR Part 262"



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 **RCRA vs. Non-RCRA Hazardous Wastes and DOT Hazardous Wastes**

RCRA hazardous wastes are required to be shipped using a manifest per *Federal* rules, which means they are always:

- DOT hazardous wastes
- DOT hazardous materials
- Regulated by the DOT when shipped



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**RCRA vs. Non-RCRA Hazardous Wastes and DOT Hazardous Wastes**

Non-RCRA hazardous wastes are required to be shipped using a manifest per *California* rules, which means they:

- Are NOT DOT hazardous wastes
- May or may not be DOT hazardous materials
- May or may not be regulated by the DOT when shipped



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**Classifying Hazardous Materials**

All DOT hazardous materials must be classified by:

- *Type* of hazard (hazard class or division)
- *Degree* of hazard (typically the “packing group”)
  - PG I = highest severity
  - PG II = moderately severity
  - PG III = minor severity



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**Classifying Hazardous Materials**

The DOT has nine hazard classes

- Hazard Classes 1–8 represent specific kinds of hazards (e.g., poisonous gas, flammable solid, radioactive material)
- Hazard Class 9 is for “miscellaneous” hazards



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### Classifying RCRA Hazardous Wastes as Hazardous Materials

**RCRA wastes** must be assigned a hazard class

- If the waste meets the definition of any DOT Hazard Class 1 through 8, then it's assigned to that hazard class
- If it does NOT meet the definition of any DOT Hazard Class 1 through 8, then it's assigned to Class 9 by default



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### Classifying Non-RCRA Hazardous Wastes as Hazardous Materials

**Non-RCRA wastes** will only be assigned a hazard class if they meet the DOT hazard class criteria

- If the waste meets the definition of any DOT Hazard Class 1 through 8, then it's assigned to that hazard class
- If it does NOT meet the definition of any DOT Hazard Class 1 through 8, then it's assigned to Class 9 ONLY if it meets the definition of a Class 9

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### Hazard Class Definitions

Class and Division	Name and Description of Class or Division	49 CFR Reference	Class and Division	Name and Description of Class or Division	49 CFR Reference
1.1	Explosives (with a mass explosion hazard)	173.50	4.1	Flammable solid	173.124
1.2	Explosives (with a projection hazard)	173.50	4.2	Spontaneously combustible material	173.124
1.3	Explosives (with predominately a fire hazard)	173.50	4.3	Dangerous when wet material	173.124
1.4	Explosives (with no significant blast hazard)	173.50	5.1	Oxidizer	173.127
1.5	Very insensitive explosives; blasting agents	173.50	5.2	Organic peroxide	173.128
1.6	Extremely insensitive detonating substances	173.50	6.1	Poisonous materials	173.132
2.1	Flammable gas	173.115	6.2	Infectious substance	173.134
2.2	Non-flammable compressed gas	173.115	7	Radioactive material	173.403
2.3	Poisonous gas	173.115	8	Corrosive material	173.136
3	Flammable or combustible liquid	173.120	9	Miscellaneous hazardous material	173.140
			ORM-D	Other regulated materials	173.144

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## Selecting a Proper Shipping Name

The DOT has three key requirements for choosing a Proper Shipping Name:

1. Select from the Table at 49 CFR 172.101
2. Be accurate
3. Be specific



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## 49 CFR 172.101 "Hazmat Table"

49 CFR 172.101 - Hazardous Materials Table

Hazard class and hazard label (1)	Hazardous materials descriptions and proper shipping name (2)	Hazard class or Division (3)	Identification Number (4)	PG (5)	Label codes (6)	Special provisions (7)	Packaging (8) <sup>**</sup>			Quantity limitations (9)				Other (10)		
							Except bulk (8A)	Non-bulk (8B)	IMC (8C)	Passenger (9A)	Capacities (9B)	Initial ton (9C)	Initial vol (9D)			
1	Acetone, see p-Nitroacetophenone															
	Accumulators, electric, see Batteries, wet, etc.															
	Accumulators, pressurized, pneumatic or hydraulic (containing non-flammable gas) and hydraulic accumulators (containing non-flammable gas)															
	Acetal	3	UN1388	3		RD, TA, TP1	150	202	242	5 L	60 L	E				
	Acetaldehyde	3	UN1089	3		A3, B3, L11, TP2, TP3	None	201	243	Forklifts	30 L	E				
	Acetaldehyde ammonia	9	UN1941	8	9	RD, PG, TP1, TP2	155	204	240	200 kg	200 kg	A	34			
	Acetaldehyde oxime	3	UN2332	8	3	B1, RD, TA, TP1	150	202	242	200 L	200 L	A				
	Acetic acid, glacial or Acetic acid solution, with more than 80 percent acid, by mass	8	UN2789	8	8	A2, A3, A4, A10, B2, RD, TP1	154	202	242	30 L	30 L	A				
	Acetic acid solution, not less than 50 percent but not more than 80 percent acid, by mass	8	UN2790	8	8	A3, A6, A7, A10, B2, RD, TP1	154	202	242	30 L	30 L	A				
	Acetic acid solution, with more than 10 percent and less than 50 percent acid, by mass	8	UN2790	8	8	RD, TA, TP1	154	202	242	60 L	60 L	A				
	Acetic anhydride	8	UN1715	8	8	A3, A6, A7, A10, B2, RD, TP1	154	202	243	30 L	30 L	A	40			

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## Naming Hazardous Wastes

If a material meets the DOT definition of a hazardous waste (e.g., RCRA wastes), then the word "waste" must be placed in front of the Proper Shipping Name, unless "waste" is already a part of the name



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**Naming Hazardous Wastes**

If a material *does not* meet the DOT definition of a hazardous waste (e.g., non-RCRA wastes), then the word "waste" will *not* be placed in front of the Proper Shipping Name



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**Naming Hazardous Wastes**

RCRA Hazardous Waste	Non-RCRA Hazardous Waste That Meets a DOT Hazard Class	Non-RCRA Hazardous Waste That Does NOT Meet a DOT Hazard Class
		

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**Naming Hazardous Wastes**

RCRA Hazardous Waste	Non-RCRA Hazardous Waste That Meets a DOT Hazard Class	Non-RCRA Hazardous Waste That Does NOT Meet a DOT Hazard Class
172.101 Table 		

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**Naming Hazardous Wastes**

RCRA Hazardous Waste	Non-RCRA Hazardous Waste That Meets a DOT Hazard Class	Non-RCRA Hazardous Waste That Does NOT Meet a DOT Hazard Class
172.101 Table Add "waste" to PSN		
		

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**Naming Hazardous Wastes**

RCRA Hazardous Waste	Non-RCRA Hazardous Waste That Meets a DOT Hazard Class	Non-RCRA Hazardous Waste That Does NOT Meet a DOT Hazard Class
172.101 Table Add "waste" to PSN	172.101 Table	
		

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**Naming Hazardous Wastes**

RCRA Hazardous Waste	Non-RCRA Hazardous Waste That Meets a DOT Hazard Class	Non-RCRA Hazardous Waste That Does NOT Meet a DOT Hazard Class
172.101 Table Add "waste" to PSN	172.101 Table Don't add "waste"	
		

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**Naming Hazardous Wastes**

RCRA Hazardous Waste	Non-RCRA Hazardous Waste That Meets a DOT Hazard Class	Non-RCRA Hazardous Waste That Does NOT Meet a DOT Hazard Class
172.101 Table Add "waste" to PSN	172.101 Table Don't add "waste"	Use the phrase "Non-RCRA Hazardous Waste, Solid" or "Non-RCRA Hazardous Waste, Liquid"
 Waste Acetone	 Sodium Hydroxide, solid	Use a generic name <i>not</i> from 172.101 Table  Non-RCRA Hazardous Waste, Liquid Plating Waste

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**Naming Hazardous Wastes**

RCRA Hazardous Waste	Non-RCRA Hazardous Waste That Meets a DOT Hazard Class	Non-RCRA Hazardous Waste That Does NOT Meet a DOT Hazard Class
172.101 Table Add "waste" to PSN	172.101 Table Don't add "waste"	Use the phrase "Non-RCRA Hazardous Waste, Solid" or "Non-RCRA Hazardous Waste, Liquid"
 Waste Acetone	 Sodium Hydroxide, solid	Use a generic name <i>not</i> from 172.101 Table Don't add "waste"  Non-RCRA Hazardous Waste, Liquid Plating Waste

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**The Uniform Hazardous Waste Manifest**

The manifest is used to ship and track hazardous waste shipments

- US EPA requires that RCRA hazardous wastes are manifested
- DTSC requires that RCRA and non-RCRA hazardous wastes are manifested



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**Shipping Papers**  
 Basic Description

1. UN/NA identification Number
2. Proper Shipping Name
3. Hazard Class(es)
4. Packing Group

I  
S  
H  
P

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group)
X	UN 1090; Waste Acetone; 3; PG II

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**Number of Packages and Quantity**

The DOT requires all hazmat shipping papers include:

- Number and type of packages
- Total quantity

Information will be in Boxes 10–12 on the manifest

10. Container No.	Type	11. Total Quantity	12. Unit Metric
10	DM	3,400	P
2	DM	1,050	P
4	DF	200	P
4	DM	2,600	P

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**Number of Packages – Abbreviations**

**Table I—Types of Containers**

BA = Burlap, cloth, paper, or plastic bags CF = Fiber or plastic boxes, cartons, cases CM = Metal boxes, cartons, cases (including roll-offs) CW = Wooden boxes, cartons, cases CY = Cylinders DF = Fiberboard or plastic drums, barrels, kegs	DM = Metal drums, barrels, kegs DT = Dump truck DW = Wooden drums, barrels, kegs HG = Hopper or gondola cars TC = Tank cars TP = Portable tanks TT = Cargo tanks (tank trucks)
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**Quantity – Unit of Measure**

**Table II—Units of Measure**

- G = Gallons (liquids only)
- K = Kilograms
- L = Liters (liquids only)
- M = Metric Tons (1,000 kilograms)
- N = Cubic Meters
- P = Pounds
- T = Tons (2,000 pounds)
- Y = Cubic Yards

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**Box 13 – Waste Codes**

Waste codes are added to Box 13 of the manifest

- RCRA wastes will have both Federal waste codes and one California waste code
- Non-RCRA wastes will only have a single California waste code

13 Waste Codes		
F003	D001	212
D008	491	
141		
726		

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**The Uniform Hazardous Waste Manifest Example**

	(9) 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			Federal	California	Other
GENERATOR	1 UN 1090; Waste Acetone; 3; PG II	10	DM	3,400	P	F003	D001	212
	2 NA 3077; Hazardous Waste, Solid, n.o.s.; 9; PG III (D008)	2	DM	1,050	P	D008	491	
	3 UN 1823; Sodium Hydroxide, Solid, 8; PG II	4	DF	200	P	141		
	4 Non-RCRA Hazardous Waste, Liquid, Plating Waste	4	DM	2,600	P	726		
14. Special Handling Instructions and Additional Information								
The above weights are net weights.								

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# Hazardous Waste Manifest Issues in California

### The Uniform Hazardous Waste Manifest Example

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15. GENERATOR/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/identified, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. I 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. Identify that the waste information statement identified in 40 CFR 262.27(a) (1) is a large quantity generator or (2) (1) I am a small quantity generator is true.

Generator/Officer's Printed/Typed Name: **Andrea Carter** Signature: *Andrea Carter* Month: **09** Day: **01** Year: **21**

International Shipments  Import to U.S.  Export from U.S. Port of entry/left: \_\_\_\_\_ Date leaving U.S.: \_\_\_\_\_

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: **Justin DeSalvo** Signature: *Justin DeSalvo* Month: **09** Day: **01** Year: **21**

Transporter 2 Printed/Typed Name: **Samantha Smith** Signature: *Samantha Smith* Month: **09** Day: **12** Year: **21**

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### The Uniform Hazardous Waste Manifest Example

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18. Discrepancy

18a. Discrepancy Indication Space:  Quantity  Type  Residue  Partial Rejection  Full Rejection

18b. Alternate Facility (or Generator) \_\_\_\_\_ Manifest Reference Number: \_\_\_\_\_ U.S. EPA ID Number: \_\_\_\_\_

18c. Facility's Phone: \_\_\_\_\_

18d. Signature of Alternate Facility (or Generator): \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

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

H020 <sup>1</sup> H101 <sup>2</sup> H121 <sup>3</sup> H132 <sup>4</sup>

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

Printed/Typed Name: **Ryan Keehne** Signature: *Ryan Keehne* Month: **09** Day: **15** Year: **21**

EPA Form 8700-02 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

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### Manifest Discrepancies

There are five different types of manifest discrepancies:

1. Significant discrepancies in *quantity*
2. Significant discrepancies in *type*
3. Container residues that exceed limits for "empty"
4. Partial rejections
5. Full rejections

18. Discrepancy

18a. Discrepancy Indication Space:  Quantity  Type  Residue  Partial Rejection  Full Rejection

Manifest Reference Number: \_\_\_\_\_

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 **Significant Discrepancies in Quantity or Type Most Hazardous Wastes**

- A significant discrepancy in *quantity* would be:
  - For bulk wastes, greater than 10% variation in weight
  - For batch wastes, any variation in piece count
- A significant discrepancy in *type* would be:
  - An obvious difference upon inspection or analysis



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 **Required Actions for Significant Discrepancies for Most Hazardous Wastes**

If a TSDF discovers a manifest discrepancy, it must:

- Attempt to reconcile the discrepancy with the generator
- Note the discrepancy in Item 18 on the manifest

*If no reconciliation after 15 days, then the TSDF must notify the DTSC in writing*



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 **Reportable Quantities and Differences for Hazardous Wastes of Concern**

- A reportable quantity would be:
  - For bulk wastes, variations greater than 3% in weight
  - For containerized wastes, any variation in piece count
- A reportable difference in type would be:
  - An obvious difference upon inspection or analysis



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 **Required Actions for Discrepancies Involving Hazardous Wastes of Concern**

If there is no reconciliation after 24 hours:

- The TSDF must immediately notify the DTSC
- The TSDF must report the discrepancy in writing to the DTSC within five days



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 **TSDF Responsibilities for Rejected Shipments**

If a facility rejects a shipment of hazardous waste, then the facility may forward the waste to another TSDF or return it to the generator

- TSDF must amend or prepare a new manifest for rejected shipment
- Manifests must be resubmitted to the state within 30 days



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 **Generator Responsibilities for Rejected Shipments**

Generators receiving their own rejected waste must:

- Sign in Box 18c or 20 as the designated facility
- Provide copies to the transporter, TSDF, and state(s), as necessary



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 **Generator Responsibilities for Rejected Shipments**

Generators who receive a rejected shipment of hazardous waste must:

- Manage the waste under applicable 90-day requirements
  - SQGs do not need to execute a written training plan or contingency plan
- Label the waste in a manner that indicates the waste is rejected
- Mark the waste with the date it was received



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 **Copies of the Paper Manifest**

Each manifest consists of five copies:

- Copy 5 – Kept by generator
- Copy 4 – Kept by transporter
- Copy 3 – Kept by TSDf
- Copy 2 – Sent by TSDf back to generator
- Copy 1 – Inputted by TSDf into EPA's e-Manifest system



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 **Generator's Recordkeeping Requirements**

Generally, with some exceptions, records need to be kept for a minimum of three years



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 **Send Copy to DTSC**

Generators must submit a signed copy of the manifest with the generator and transporter signatures ("Copy 5") to the DTSC within 30 days of the shipment

- If waste shipped *out of state*, must also send a copy of the manifest with the generator, transporter, and TSDf signatures ("Copy 2") to the DTSC within 30 days



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 **Corrections to Manifests**

A manifest correction letter must be sent to the DTSC whenever hazardous waste manifests containing incorrect or incomplete information are submitted.

- \$20 fee if DTSC discovers the error and requests correction letter.
- No charge if the company submits the correction letter before being notified by the DTSC.



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 **Generator Exception Reporting**

An exception report is executed when generator doesn't receive a signed confirmation copy of manifest back from TSDf

- All generators
  - Call or contact TSDf after 35 days
- Large quantity generators
  - Report to the DTSC after 45 days
- Small quantity generators
  - Report to the DTSC after 60 days

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 **Consolidated Manifesting**

- To utilize a consolidated manifest, the waste being shipped must be either:
  - A non-RCRA hazardous waste; or
  - A RCRA hazardous waste that is not required to be manifested under Federal regulations
- Consolidated manifest receipts must contain specific information



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 **Consolidated Manifesting**

- Used oil is most common waste stream used for consolidated manifests
  - Full list of eligible waste streams can be found at HSC §25160.2(c)
- Transporter completes the consolidated manifest and leaves a receipt with the generator



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**Thank you for attending!**



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