



Modification of the HW Manifest System

Final Rule

70 FR 10776

Effective Sep 5, 2006



Background

- Final rule revised:
 - the manifest form itself, and
 - the procedures for using the form
- Postponed adoption and implementation of electronic manifest
 - EPA conducting further research



Why A New Form?

- *Standardize and Simplify...*
 - Less Confusion previously caused by abundance of State-Required Forms
 - Potentially Lower costs for All
 - Some State data requirements burdensome & redundant
 - Should enhance and simplify Annual/Biennial Reporting



When Is It Effective?

- Old Form & Rules Applicable
 - Until Sep 5, 2006
- New Form & Rules Applicable
 - On and After Sep 5, 2006



What Was Changed?

- Forms Now Available from a Variety of Sources
- All entries now Mandatory
 - All but Two Previously-Optional Fields Removed
- 12-Digit Tracking Number Added
- Added Field for Site Address if Different than EPA-number-holder's mailing address



What Was Changed?

- Blocks and Lines Numbered Differently
- Limited to 6 Waste Codes per Line Item
- Generator/Offeror Certification Option
- Addition of International Shipment Field
- Revised Management Method Codes



Acquiring the Forms

- **Before:**
 - 23 States required Generators to purchase and/or use State-produced forms
 - Generic EPA-form could be purchased from commercial vendors for shipments not required to use specific state forms
 - HW Disposal Contractors responsible for supplying manifests for DRMS Shipments
- **After:**
 - Forms may be acquired from EPA-Registered & Approved, Commercial Vendors
 - States may become EPA-Registered & Approved Vendors, but cannot require shippers to acquire and use theirs exclusively
 - HW Disposal Contractors responsible for supplying manifests for DRMS Shipments



All Entries Mandatory-Most Optional Fields Removed

Removes the Following Previously State-Required Fields

- » **State Manifest Document Number**
- » **State Generator's ID**
- » **State Transporter's ID**
- » **Transporter's Phone**
- » **State Facility's ID**
- » **Facility's Phone**



Twelve-Digit Tracking Number Added

- **No Longer a Five Digit Tracking Number Combined with Generator's EPA ID #**
 - Manifest Tracking Number format now consists of nine numbers followed by a unique three-letter suffix.
 - Numbers are serialized
 - Three-letter suffix identifies the printer
 - Example: 000000109ABC (manifest number 109, printed by ABC printers)
- **Manifest Tracking Number No Longer Assigned by State, Generator, DRMO, HW Disposal Contractor, etc.**
 - Registered printers will assign each manifest a unique, pre-printed Manifest Tracking Number.



Site Address Field Added

- **Block 5 of the new manifest contains additional room for the Generator's "Site Address"**
- **To be used only when the physical site address and/or pickup location is different than the mailing address listed in Block 5 of the manifest.**



Block and Line Numbers Have Changed!

- **Waste descriptions now start in Blocks 9 & 27**
- **Continuation page waste descriptions are numbered sequentially according to the waste line numbers from the previous page(s)**
 - For instance, the first page would contain lines 1 through 4.
 - The first continuation page would contain lines 5 through 14.
 - The second continuation page would contain lines 15 through 24, and so on
- **Users are accustomed to doing things the old way.**
 - Double-Check data prior to storage and shipment, and prior to system input.
 - Failure to input correct updated numbers will affect other automated reports, and tracking mechanisms, e.g., Annual/Biennial Reports, CSF HW Logs, ERS Data, etc.



Waste Code Assignment (Block 13)

- **Now Limited to Six Waste Codes per Waste Stream**
 - Can be a combination of federal and unique state waste codes.
- **Since there is only room for six waste codes, what is the process for determining which waste codes to use?**
 1. Enter all State-required waste codes, which are NOT redundant with applicable Federal Waste Codes
 2. If there are less than six State-required waste codes entered, enter the Federal waste codes which most accurately represent the waste in the remaining spaces.



Waste Code Assignment (Block 13)

- **Who is Responsible for Determining Which Waste Codes are Included in Block 13?**
 - The originating State governs the Generator.
 - The Generator is responsible for complying with his/her State's regulations.
 - Therefore, for DRMS HW Disposal purposes, the Generator will make the determination.
 - In cases where the Generating State does NOT have its own waste codes, the Receiving State's waste codes should be considered, and entered if applicable and the Generator agrees. (The DRMS HW disposal contractor should provide the correct information when submitting a manifest to the COR and Generator for approval. That information is available from State regulatory sources either by internet, or by telephone.)



Special Handling Instructions and Additional Information (Block 14)

- **Generators may enter any special handling or shipment-specific information necessary for the proper management or tracking of the materials under the generator's or other handler's business processes, such as:**
 - waste profile numbers
 - container codes
 - bar codes
 - Emergency Response Guide Numbers (ERG)
 - manifest tracking number of original manifest for rejected wastes and residues that are re-shipped under a second manifest
 - alternate facility designations
 - PCB information



Special Handling Instructions and Additional Information Continued (Block 14)

- **Can I include additional State and/or Federal waste codes in Block 14?**
 - While EPA does not expressly prohibit it, additional waste codes, i.e, those *not* identified in Block 13, may be included there, at the user's discretion. However, this practice is not recommended for use by DRMS HW Disposal Contractors.
- **Am I *required* to use Block 14 to record additional waste codes?**
 - No. In fact, EPA expressly addresses that issue. “Generators cannot be required to enter information in this space to meet state regulatory requirements.”



Generator's/Offeror's Certification (Block 15)

- **When a party other than the generator prepares the shipment for transportation, this party may also sign the shipper's certification shipment as the offeror of the shipment.**
- **Generator or Offeror personnel may preprint the words, "On Behalf of" in the signature block or may hand write this statement in the signature block prior to signing the certification, to indicate that the individual signs as the employee or agent of the named principal.**



Addition of International Shipment Field (Block 16)

- Information was previously provided in the “Special Handling and Additional Information” Field.
 - All relevant information listed is mandatory if applicable
 - Importers
 - Transporters must deliver a copy of the manifest to the U.S. Customs when exporting the waste across U.S. borders



Management Method Codes (Block 19)

- **Code for each waste stream listed in Block 9 is to be entered by the first TSDf that receives the waste**
 - *Not by the Generator, COR, Transporter, etc.*
 - *Field should be blank at the time of shipment*
 - *Must be the code that best describes the way in which the waste is to be managed when received by the TSDf*
- Previous codes obsolete
- Now known as the “Hazardous Waste Report Management Method Codes”



FR Changes/Additions Not Addressed in this Study Period

- Final tracking procedures for discrepancies, rejected waste, and residue shipments.
- Use of fractions
- Definition of Bulk Containers
 - Now 119 gallons vs. 110



Questions?

- State-specific issues: contact your state's environmental management office. Contact information can be found at:
<http://www.epa.gov/epahome/state.htm>