



**PDHonline Course C251 (1 PDH)**

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## **New Hazardous Waste Manifest Rules**

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## New Hazardous Waste Manifest Rules

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### COURSE CONTENT

On March 4, 2005, the U.S. Environmental Protection Agency published new regulations that significantly changed the hazardous waste manifest system.

Central to the rule change was a new hazardous waste manifest form, a standardized form that is to be used nationwide in all states and territories, replacing approximately 24 state-specific variations of the old form. The rule change allowed an 18-month transition period, which ended on September 4, 2006. Since September 5, 2006, only the new standardized manifest form and the new manifest completion instructions are valid for use.

Change can be challenging. But the good news is that the new form and associated instructions are simpler, less confusing, and more streamlined than the former system.

This course will walk you through educational information about the new hazardous waste manifest rule that is available on the EPA website.

#### **Hazardous Waste Manifests**

In the United States, all hazardous waste shipped off-site must be tracked using a manifest that provides information about the generator of the waste, the facility that will receive the waste, a description and quantity of the waste, and how the waste is to be transported to the receiving facility.

The hazardous waste manifest tracks who has custody of a waste shipment at a given time and where it will be managed.

The manifest is the “shipping paper” required by both EPA and U.S. Department of Transportation for hazardous waste shipments.

Adobe Flash Player and access to the Internet are required to complete this course. Flash Player can be downloaded for no cost from [http://www.adobe.com/shockwave/download/index.cgi?P1\\_Prod\\_Version=ShockwaveFlash](http://www.adobe.com/shockwave/download/index.cgi?P1_Prod_Version=ShockwaveFlash)

## **1. New Hazardous Waste Manifest System**

As background to the hazardous waste manifest rule changes, read EPA's fact sheet on that subject:

<http://www.epa.gov/osw/hazard/transportation/manifest/manfst-fs.htm>

Making the intended use of each manifest entry item consistent from state to state has helped to minimize some of the previous manifest information confusion. Previously, completion of some of the manifest items was optional and different states specified that different information be entered for some blocks.

Besides eliminating inconsistencies, the new manifest also provides a clear and consistent way to document some of the hazardous waste shipping situations that were not as well handled on the previous form. Following are examples of features of the new manifest that help in this way:

- Box for the address of waste-generating facility if the address is different than the mailing address of the generator, making it clearer where the waste was actually generated;
- Check boxes for the receiving facility to document discrepancies between the manifest information and the material received;
- Check boxes for the receiving facility to document rejection of partial or full loads and subsequent shipments of the waste;
- Boxes for the receiving facility to enter management codes to indicate how the waste will be managed; and
- Space for specification of the port of entry or exit for the import or export of hazardous wastes.

More information on these topics is included in the video that you will view in Section 3.

If you are interested in the details of the rule change, you can read the actual regulatory change as published in the Federal Register on March 4, 2005. A link is included in the References section below. (Note: Reading the Federal Register entry is not required to complete this course.)

## **2. Acquiring Manifest Forms**

EPA does not distribute the manifest forms. The forms must be obtained from organizations that have been registered with EPA to print and distribute the form. The following link is for EPA's webpage of Approved Registered Printers for the Manifest:

<http://www.epa.gov/osw/hazard/transportation/manifest/registry/printers.htm>

## **3. Manifest Completion Instructions**

The University of Wisconsin-Extension prepared a training video on the new hazardous waste manifest rule. This 20-minute video provides a concise review of the regulatory changes and instructions for completing the hazardous waste manifests. Viewing the video is a key component of this course.

Before viewing the video, please print a copy of the new standardized Uniform Hazardous Waste Manifest form and EPA's Instructions for Completing the Hazardous Waste Manifest. You will find it helpful to refer to these documents as you view the video.

An example of the first page of the new manifest form (EPA Form 8700-22) is available from EPA:

<http://www.epa.gov/osw/hazard/transportation/manifest/pdf/newform.pdf>

And an example of the continuation page (EPA Form 8700-22A):

<http://www.epa.gov/osw/hazard/transportation/manifest/pdf/con-sheet.pdf>

The manifest completion instructions are available at:

<http://www.epa.gov/osw/hazard/transportation/manifest/pdf/man-inst.pdf>

View the video, which is found at the Printers' National Environmental Assistance Center website:

<http://www.pneac.org/hazwastemanifest>

#### **4. Link to State-Specific Requirements**

Although the new rules eliminated the vast majority of state-to-state differences in manifest information requirements, a number of states continue to have additional requirements. Some states require copies of the final manifest to be submitted to the state, and some states require that state-specific waste codes be entered on the manifest in addition to the federal hazardous waste codes.



In order to ensure compliance with all of the manifest rules that apply to your activities, be sure to fully understand any state-specific requirements of the states in which your waste is generated and the states of your receiving facilities.

Links to the hazardous waste manifesting requirements of each state can be found at:

<http://www.epa.gov/osw/hazard/transportation/states.htm>

Note: This link was included for your reference; reading the state-specific hazardous waste manifest requirements is not required for completion of this course.

#### **5. Course Summary**



One aspect of the United States hazardous waste regulations – manifest use - has been made simpler, less confusing, and more streamlined. Since September 5, 2006, hazardous waste generators, transporters, and receiving facilities must comply with the streamlined hazardous waste manifest requirements for each shipment. Using the new standardized hazardous waste manifest form and completing manifests according to the new instructions will help to ensure that your hazardous waste shipment documentation is in compliance with the current regulations.

## **References**

The Final Rule [Federal Register: March 4, 2005 (Volume 70, Number 42), Page 10775-10825] - <http://www.epa.gov/fedrgstr/EPA-WASTE/2005/March/Day-04/f1966.htm>

EPA webpage “The Hazardous Waste Manifest System” - <http://www.epa.gov/osw/hazard/transportation/manifest/>

EPA webpage “Modification of the Hazardous Waste Manifest System” - <http://www.epa.gov/osw/hazard/transportation/manifest/mods.htm>

EPA webpage “Manifest Registry” - <http://www.epa.gov/osw/hazard/transportation/manifest/registry/index.htm>

EPA webpage “Manifest Form Frequent Questions” - <http://www.epa.gov/osw/hazard/transportation/manifest/faqs4-07.htm>

Instructions for Completing the Hazardous Waste Manifest – <http://www.epa.gov/osw/hazard/transportation/manifest/pdf/man-inst.pdf>

Uniform Hazardous Waste Manifest Form Example - <http://www.epa.gov/osw/hazard/transportation/manifest/pdf/newform.pdf>