

Hazardous Waste Manifest

And then we have this...A hazardous material used in a manufacturing process ultimately becomes a waste. A hazardous material which is no longer useable is a hazardous waste. In addition, the Environmental Protection Agency (EPA) has a list of over 500 materials which are known wastes because they pose a risk to our health, safety, or the environment. Hazardous wastes are governed and regulated by Title 40 of the Code of Federal Regulations (40 CFR). The EPA has established three defining criteria for companies or individuals who create or "generate" hazardous wastes. They are referred to as "Generators" and there are three of them;

- A) Conditionally Exempt Small Quantity Generators: If you generate less than 220 lbs (100 kg) per month of hazardous waste
- B) Small Quantity Generators: if you generate between 220 and 2,200 lbs (100 and 1,000 kg) per month of hazardous waste and
- C) You are considered a Large Quantity Generator if you generate more than 2,200 lbs (1,000kg) per month of hazardous waste

Your level of waste management, responsibilities, liabilities, and registration with the EPA depend on the amount of waste you generate. What size Generator are you? To comply you must provide training to your employees. The training should include but not limited to;

- A) Emergency Response Information, Telephone Numbers, and Emergency Procedures
- B) Handling, Marking, Labeling, Packaging, Documentation, Hazardous Waste Manifest
- C) Federal & State Requirements

The Department of Transportation (DOT) has incorporated by reference the EPA's requirement for transporting Hazardous Wastes. The requirement is in 49CFR, Section 172.205.

There it references the EPA's requirement (40CFR, Section 262) to provide a Hazardous Waste Manifest while the waste is being transported. Because it is a waste in almost all situations it is being transported for disposal (incineration) or recycling. The Generators in almost all situations hire a disposal company to pick up the waste and transport it for disposal or recycling.

The Generator is required to complete the Hazardous Waste Manifest (EPA's Form 8700-22). It is a single page document which declares the hazardous wastes being shipped. There are standard hazardous waste codes used to identify the materials on the form. In many situations the Generator will rely on the "Transporter" to complete the Hazardous Waste Manifest. It is very important for the Generator to choose a Transporter and disposal facility carefully because the Generator remains ultimately responsible for all aspects of the hazardous waste from cradle to grave.

A copy of the Hazardous Waste Manifest is on the other side of the page. Instructions on how to complete the form is at <https://www.epa.gov/hwgenerators/uniform-hazardous-waste-manifest-instructions-sample-form-and-continuation-sheet-and>

The EPA has a great publication titled, Managing Your Hazardous Waste which I referenced for this article and will serve as a guide to ensure compliance with both EPA and DOT requirements. <https://www.epa.gov/sites/production/files/2014-12/documents/k01005.pdf>

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