



Manifest shipments of hazardous waste

Step 7 in the *10 Steps to Hazardous Waste Compliance* series

What is a hazardous waste manifest?

A hazardous waste manifest (manifest) is a multi-copy shipping paper that must accompany most shipments of hazardous waste. The manifest used nationwide is the Universal Hazardous Waste Manifest, [U.S. Environmental Protection Agency](#) (EPA) Form 8700-22. The purpose of the manifest is to track each shipment of hazardous waste from *cradle-to-grave* – the site where the waste is generated to its final recycling or disposal facility.

Remember that under the hazardous waste regulations, you as the original waste generator remain liable forever for any mismanagement of your waste, even after it leaves your site. The manifest system helps assure that your waste reached its intended destination. In addition, manifests can be useful for reporting annual hazardous waste and tracking waste reduction efforts. They can help provide liability protection by documenting responsible hazardous waste management.

Regulations requiring hazardous waste manifests

Two main sets of regulations require the use of manifests:

1. Minnesota Pollution Control Agency (MPCA) [Hazardous Waste Rules](#) (Rules)
2. U.S. Department of Transportation (DOT) Hazardous Materials Regulations (HMR)

In addition, wastes containing regulated concentrations of polychlorinated biphenyls (PCBs) are also regulated under the EPA Toxic Substances Control Act (TSCA) Regulations. Your waste shipment will fall into one of the three possible conditions under these requirements:

1. Hazardous waste requiring a manifest under the Rules and a hazardous materials shipping paper under the HMR. If properly completed, your manifest will fulfill both sets of requirements.
2. PCB waste requiring a manifest under the TSCA Regulations. For more information on TSCA manifesting requirements, see MPCA hazardous waste fact sheet #4.48d, [Manifest and Dispose of PCBs](#), at <http://www.pca.state.mn.us/publications/w-hw4-48d.pdf>. If properly completed, your manifest used for shipping PCBs will also fulfill the hazardous material shipping paper requirement under the HMR, if required.
3. Partially-exempt waste not requiring a hazardous waste manifest under the Rules, but that may still require a hazardous materials shipping paper under the HMR.

Both you and your selected transporter are responsible for determining what type of shipping document is required for your specific shipment.

What shipments require use of a manifest?

All shipments of hazardous waste from your site, except for some partially-exempt wastes, must be accompanied by a manifest. See Table 1 for common wastes not requiring a manifest.

Table 1: Common wastes not requiring a manifest*

Universal wastes (in Minnesota: fluorescent lamps, batteries, mercury-containing devices, dental amalgam, pretreated mercury-containing dental wastewater, electronics including cathode ray tubes, and pesticides eligible for a waste pesticide collection program)

For more information on universal wastes, see MPCA hazardous waste fact sheet #4.62, [Universal Wastes](http://www.pca.state.mn.us/publications/w-hw4-62.pdf), at <http://www.pca.state.mn.us/publications/w-hw4-62.pdf>.

Certain product-like pharmaceuticals

For more information on managing product-like pharmaceuticals that do not require a manifest, see MPCA hazardous waste fact sheet #3.36b, [Reverse Distribution of Non-controlled Pharmaceutical Products](http://www.pca.state.mn.us/publications/w-hw3-36b.pdf), at <http://www.pca.state.mn.us/publications/w-hw3-36b.pdf>.

Used oil wastes being recycled (used oil, filters, and used oil-containing sorbents)

For more information on used oil, see MPCA hazardous waste fact sheet #4.30, [Managing Used Oil and Related Wastes](http://www.pca.state.mn.us/publications/w-hw4-30.pdf), at <http://www.pca.state.mn.us/publications/w-hw4-30.pdf>.

Wastes destined for continued use in the use for which they were originally made

For more information on continued use of materials you can't use at your site, see MPCA hazardous waste fact sheet #3.36a, [Reverse Distribution of General Merchandise](http://www.pca.state.mn.us/publications/w-hw3-36a.pdf), available at <http://www.pca.state.mn.us/publications/w-hw3-36a.pdf>.

Wastes destined for use or reuse as a feedstock or byproduct

For more information on continued use and use or reuse as a feedstock or byproduct, see MPCA hazardous waste fact sheet #2.42, [Recycling Hazardous Waste](http://www.pca.state.mn.us/publications/w-hw2-42.pdf), available at <http://www.pca.state.mn.us/publications/w-hw2-42.pdf>.

Shipments from a Very Small Quantity Generator (VSQG) to a VSQG Collection Program

For more information on VSQG Collection Programs and requirements, see MPCA hazardous waste fact sheet #2.51, [VSQG Collection Program Requirements for Generators](http://www.pca.state.mn.us/publications/w-hw2-51.pdf), available at <http://www.pca.state.mn.us/publications/w-hw2-51.pdf>.

Wastes generated by a contractor on your site, except for PCBs, that the contractor will transport in their own vehicle back to their base of operations and ship with a manifest from that location. PCB wastes generated by a contractor at your site require a manifest from your site.

For more information on transportation of waste by a contractor, see MPCA hazardous waste fact sheet #3.11, [Transporting Waste Generated by Construction and Service Contractors](http://www.pca.state.mn.us/publications/w-hw3-11.pdf), available at <http://www.pca.state.mn.us/publications/w-hw3-11.pdf>

Wastes evaluated as non-hazardous

** May still require a hazardous materials shipping paper under the HMR. Contact the DOT for more information regarding hazardous materials shipping requirements.*

Where can I get blank manifests?

Blank copies of EPA Form 8700-22, the Uniform Hazardous Waste Manifest, are available from any EPA-approved printer or from the [Minnesota Bookstore](#). Most hazardous waste transporters will obtain and provide you with a manifest if you contract for their services.

Online or electronic manifests are not currently available; however, the EPA is developing standards for electronic manifesting.

Who must complete the manifest?

You as the waste generator are responsible for completing the manifest. Although most hazardous waste transporters will obtain and pre-fill a blank manifest with your shipment information, you remain

responsible for its accuracy. Before your waste is loaded on the transporter's vehicle, carefully check each item on your manifest. After your waste is loaded, sign the manifest.

How do I fill out a manifest?

Because the manifest is a six-part carbon-copy form, you must fill it out using an impact printer, typewriter, or ballpoint pen. Do not use pencils or marker-type pens. Ensure all six pages of the manifest are legible before the shipment leaves your site.

Whether you complete the manifest yourself or your transporter brings it to you pre-filled, be sure to follow the instructions on the back of the last page of the manifest (see *Item-by-item guidance* on pages 6-8 of this document).

What should I do if I make an error completing the manifest or a preprinted manifest is incorrect?

Your manifest is not an official document until you, the generator, sign it. You may use a ballpoint pen or typewriter to make any changes necessary to the manifest before you sign it. If correcting a preprinted manifest, ensure you write hard enough to make the changes to all six copies. Do not erase or use a whiteout substance to make corrections to a manifest.

If you need to make changes after you sign it, ensure that all other signatories are notified and approve of the changes. Document your notification to all other signatories and submit a copy of that documentation along with your manifest to the appropriate Minnesota regulatory agency (see Table 2).

What happens after the shipment leaves my site?

Your signed manifest should have six pages. After your transporter signs and dates the manifest in Item 17, they should remove and give you the bottom page, titled *Generator Initial Copy*, also known as the initial page, or more commonly as the two-signature page. You will need to make a legible photocopy or electronic image of this page. Unreadable copies will not meet any of the regulatory requirements below. The top five pages will accompany your shipment with the transporter.

Keep a legible copy of the *Generator Initial Copy* in your records and within five working days also:

- Mail a legible photocopy of the *Generator Initial Copy* to the appropriate Minnesota regulatory agency shown in Table 2.
- Mail a legible photocopy of the *Generator Initial Copy* to the hazardous waste regulatory agency of the state where the designated facility identified in Item 8 is located, if required by that state. Find a list of state hazardous waste regulatory agencies on the EPA website <http://www.epa.gov>.

Note: You need not submit copies of manifests used for shipping only PCBs to the agency shown in Table 2. Keep these copies in your records instead, and ensure you meet any additional PCB requirements under the TSCA Regulations.

When the transporter and your shipment reach the designated facility, the facility's representative should sign and date all remaining copies of the manifest. It should then give the transporter a signed copy, retain one for itself, and send you a signed copy of the *Designated Facility to Generator Copy*, also known as the final page or, more commonly, the three-signature page. You must ensure that within 40 days of the facility's receipt of the waste, you, your transporter, or the facility mail a legible photocopy of the *Designated Facility to Generator Copy* to the appropriate Minnesota agency shown in Table 2.

Table 2: Where to submit manifests

| If you are a | Located in | Send manifest photocopies to |
|--|--|---|
| Large Quantity Generator (LQG) Small Quantity Generator (SQG) | All Minnesota counties | Minnesota Pollution Control Agency Attn: HWIMS 520 Lafayette Rd N St Paul, MN 55155-4194 |
| Very Small Quantity Generator (VSQG) | Anoka, Carver, Dakota, Hennepin, Ramsey or Washington County | Hazardous Waste Manifest Program Mail Code 609 300 S 6th St Minneapolis, MN 55487-0999 |
| Very Small Quantity Generator (VSQG) | Scott County | Scott County Environmental Health 200 - 4th Ave W Shakopee, MN 55379-1220 |
| Very Small Quantity Generator (VSQG) | All counties except the seven metropolitan counties listed above | Do not mail photocopies of your manifests; keep the copies in your records. |

What if I don't get the *Designated Facility to Generator Copy* back from the facility?

The designated facility should return the *Designated Facility to Generator Copy* to you within 30 days of accepting your waste. If you do not receive the copy within 35 days from the date the waste was shipped from your site, contact both the transporter and the designated facility to determine the status of your shipment and the copy.

If you do not receive the *Designated Facility to Generator Copy* within 45 days, submit an exception report to the MPCA by sending:

- A legible copy of the *Generator Initial Copy*.
- A letter documenting your efforts to determine the status of your waste and obtain the *Designated Facility to Generator Copy*.

How can I check the MPCA's records of my manifests?

SQGs and LQGs may review the data from manifests entered into the MPCA's records using the MPCA's [Hazardous Waste Manifest Reports tool](http://www.pca.state.mn.us/waste/mani.cfm) at <http://www.pca.state.mn.us/waste/mani.cfm>.

You are encouraged to check this database periodically to ensure all of your manifests have been received by the MPCA.

How long and where must I keep manifest records?

Keep a legible copy of all of your manifests for at least three years from the date the waste was shipped from your site. Also, keep a copy of all exception reports and documentation of any changes made to manifests after you signed them.

Keep your manifest records at the site where the waste was generated. You may keep legible scans or images of paper manifests in lieu of hard copies. The MPCA recommends keeping manifest records beyond the life of your business.

What are Land Disposal Restriction notices?

SQGs and LQGs must send a notice to the designated facility with the manifest notifying the facility that their waste either does or does not meet the land disposal restriction (LDR) treatment standards. The generator needs to send this notice to the facility only once unless the composition or characteristics of the waste stream change. Many hazardous waste transporters will prepare an LDR notice on your behalf as part of your contracted services. Keep copies of your LDR notices as you would any other manifest documents.

More information

Your metropolitan county and the MPCA have staff available to answer your manifesting questions. For more information, contact your metropolitan county hazardous waste office or your nearest MPCA regional hazardous waste staff.

Metro County Hazardous Waste Offices

Anoka 763-422-7093
Carver 952-361-1800
Dakota 952-891-7557
Hennepin 612-348-3777
Ramsey 651-266-1199
Scott County.....952-496-8475
Washington County.....651-430-6655
Websites [http://www.co.\[county\].mn.us](http://www.co.[county].mn.us)

Minnesota Bookstore

Toll free 1-800-657-3757
Metro651-297-3000
Website <http://www.comm.media.state.mn.us>

Minnesota Technical Assistance Program

Toll free 1-800-247-0015
Metro612-624-1300
Website <http://www.mntap.umn.edu>

Minnesota Pollution Control Agency

Toll free (all offices)..... 1-800-657-3864
Brainerd 218-828-2492
Detroit Lakes218-847-1519
Duluth218-723-4660
Mankato507-389-5977
Marshall507-537-7146
Rochester507-285-7343
St. Paul651-296-6300
Willmar320-214-3786
Website <http://www.pca.state.mn.us>

Minnesota Department of Transportation

Hazardous Materials 651- 215-6330
Website
.... <http://www.dot.state.mn.us/cvo/hazmat.html>

U.S. Department of Transportation

Hazardous Materials 1-800-467-4922
Website <http://www.phmsa.dot.gov/hazmat>

Manifest guidance – Item-by-item

1. Generator ID Number

Enter your site's Hazardous Waste Identification Number, (HWID), also known as an 'EPA ID Number'. You can find this number on your generator license. Unless you are shipping only PCBs, you must obtain an HWID before shipping your waste. For more information on obtaining an HWID, see MPCA hazardous waste fact sheet #1.02, [Step 2: Obtain a Hazardous Waste Identification Number](http://www.pca.state.mn.us/publications/w-hw1-02.pdf), available at <http://www.pca.state.mn.us/publications/w-hw1-02.pdf>.

2. Page 1 of

If you are using a Continuation Sheet (EPA Form 8700-22A), indicate how many pages are in the packet. Count all copies of the manifest base sheet as one page. If you are not using a Continuation Sheet, leave this space blank or enter '1'.

3. Emergency Response Phone

Enter the telephone number that first responders, such as firefighters, should call in case of an emergency involving your waste shipment. The telephone number must meet the following criteria:

- The telephone is monitored continuously until the shipment reaches its destination. Pagers and answering machines do not meet the continuous-monitoring requirement. Do not use '911' or the Minnesota Duty Officer reporting number.
- The emergency telephone number must contact a person who is knowledgeable of the hazardous waste and has comprehensive, product specific, emergency response and incident mitigation information for the wastes, or has immediate access to a person with such knowledge and information. Providing only the information already contained in the DOT's Emergency Response Guidebook is insufficient.
- You may contract with an Emergency Response Information (ERI) service vendor, such as CHEMTREC®, to meet this requirement and list their emergency number on the manifest. If you have not directly contracted with such a service, but are registered through a third party or as part of an association and want to list the ERI vendor's number on the manifest to meet this requirement, you must also list the name of the third party or association through whom you are registered, a contract number, or another unique identifier assigned to you or the association by the ERI provider. List this information in this space, or if there is not enough room, in Item 14. Do not list an ERI provider's telephone number if you are not registered to receive their services.

Note: If you contract with an ERI provider, you must supply that provider with specific, complete and detailed emergency information for your hazardous waste before completing the manifest.

- If the emergency response telephone number for each waste in your shipment is not the same, leave this space blank and list the appropriate telephone number for each waste after the waste's description in Item 9b.

4. Manifest Tracking Number

Your manifest should have an imprinted unique identifying number consisting of nine digits followed by three letters. If it does not, stop! Get another manifest. Only imprinted manifests are valid for use.

5. Generator's Name and Mailing Address/Generator's Site Address

Enter your mailing address. If the waste-generation site is different from the mailing address or if your mailing address is a Post Office Box, also enter the street address for the waste-generation site. If your street address has been renamed based on the 911-system, such as changing from a Rural Route and number to a named or numbered street, ensure that the new correct address is shown on the manifest.

Also, check that the site address you enter on the manifest is the same as the location address for which your HWID was issued and that is printed on your hazardous waste generator license. If it is not, ensure that the site address from which you are shipping is on the same contiguous property as the licensed

location. If it is not, stop! You must obtain a new HWID for the site address from which you intend to ship. See the instructions for Item 1.

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

Enter the company name and HWID Number or EPA ID Number of the hazardous waste transporter picking up waste from your site. If your transporter does not have an HWID or EPA ID Number, stop! Contact another transporter. Only transporters who have obtained an HWID or EPA ID Number may transport hazardous waste in Minnesota. Do not enter the driver or vehicle information in this space.

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

If your transporter will transfer your waste to another transporter before the waste arrives at the facility designated in Item 8, enter the second transporter's information in this space. If more than two transporters will handle your waste, use a Continuation Sheet and enter the information in Items 25 and 26.

Each transporter who will handle your waste must be specified on the manifest before you sign it. Neither you nor your transporter may enter a generic list of 'preapproved' transporters or indicate that secondary transporters are 'To Be Determined' or any similar phrase or meaning.

If an unforeseen circumstance or emergency requires your waste to be transferred to another transporter not listed on the manifest you signed, the transporter in possession of your waste must contact you, identify the other transporter, and obtain your documented approval of the change before the waste may be transferred. This requirement does not apply to emergency response agencies taking reasonable action to control the scene of an emergency. Keep documentation of all such changes and submit them with your manifest photocopies to the MPCA or County if you are required to submit them (see Table 2).

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

Identify the destination facility for your waste and the facility's site address and telephone number. This must be a permitted Hazardous Waste Treatment, Storage, or Disposal Facility (TSDF), the facility where your waste will be recycled, if applicable, or a Commercial Storer of PCBs if you are shipping only PCBs.

9a. HM

For each line-itemed waste you identify in Item 9b, mark an 'X' in this space if the waste is also a hazardous material under the HMR.

9b. U.S. DOT Description

For each line-itemed waste, enter the proper DOT shipping name, hazard class or division, hazardous materials identification number, and packing group, if applicable. Also, enter in this space any applicable technical names and reportable quantity references for each waste. As discussed in Item 3 above, if the emergency telephone for each waste is not the same, enter the applicable telephone number for each waste in this space. If you have questions regarding proper DOT shipping names or other information, contact the DOT (see the *More information* section on page 5).

If you are shipping more than four waste line items, enter each additional waste in Item 27b of a Continuation Sheet.

Table 3: Standard abbreviations for types of containers

| | |
|----|--|
| BA | Burlap, cloth, paper, or plastic bags |
| CF | Fiber or plastic boxes, cartons, cases |
| CM | Metal boxes, cartons, cases (includes roll-offs) |
| CW | Wooden boxes, cartons, cases |
| CY | Cylinders (compressed gas) |
| DF | Fiberboard or plastic drums, barrels, kegs |
| DM | Metal drums, barrels, kegs |
| DT | Dump truck |
| HG | Hopper or gondola cars |
| TC | Tank cars |
| TP | Portable tanks |
| TT | Cargo tanks (tank trucks) |

10. Containers

Enter the number and type of container for each line-itemed waste using the standard abbreviations. See Table 3 for a list of standard abbreviations for common container types.

11. Total Quantity

Enter the net quantity of waste for each line-itemed waste in this space; use whole numbers without any decimals or fractions. You need not include the weight of the container holding the waste. If you are shipping less than a full container, ensure you include only the actual or estimated quantity of the waste shipped, not the total capacity of the container.

12. Unit Wt./Vol.

Enter the appropriate unit of measure for the net quantity of waste for each line-itemed waste in this space using the standard abbreviations. See Table 4 for a list of standard abbreviations for acceptable units of measure.

13. Waste Codes

Enter all applicable hazardous waste codes for the line-itemed waste, up to a maximum of six. If the waste displays more than six codes, enter the six most representative of the properties of the waste as a whole. You must include any Minnesota-specific codes applicable to the waste among those you enter. If you ship Lab Pack wastes, you must still enter any non-redundant waste codes, up to a maximum of five, in addition to the MN02 waste code. See Table 5 for a list of Minnesota-specific waste codes.

14. Special Handling Instructions and Additional Information

You may use this space to enter any additional information needed by the transporter or designated facility, including waste profiles, waste densities, or special requirements for waste handling.

If shipping PCB wastes, you must also enter the additional TSCA information required in this space. For more information on TSCA manifesting requirements, see MPCA hazardous waste fact sheet #4.48d, [Manifest and Dispose of PCBs](http://www.pca.state.mn.us/publications/w-hw4-48d.pdf), available at <http://www.pca.state.mn.us/publications/w-hw4-48d.pdf>.

15. Generator's/Officer's Certification

Carefully read the generator's/officer's certification. The person signing the manifest legally affirms the statement and can be held liable for false information on the manifest and improperly packaged or labeled items in the shipment.

15. Generator's/Officer's Printed/Typed Name

Before you sign the manifest ensure all of the pre-transport requirements discussed in MPCA hazardous waste fact sheet #1.06, [Step 6: Treat and Dispose of Hazardous Waste Correctly](http://www.pca.state.mn.us/publications/w-hw1-06.pdf) (<http://www.pca.state.mn.us/publications/w-hw1-06.pdf>) have been completed.

Legibly print or type the name of the person signing the manifest in the left side of this space. In the right side of this space, sign and date the manifest. When signing, press hard enough to reproduce the signature on all pages of the manifest.

If another person signs on behalf of your representative whose name is already preprinted on the manifest, write "On behalf of" immediately to the right of the preprinted name before signing.

Under the HMR, any person signing the manifest must have documented training in hazardous materials packaging, labeling, and manifesting. Contact the DOT to determine the specific training required by your employees.

Table 4: Standard abbreviations for units of measure

| | |
|---|------------------------------|
| G | Gallons (liquids only) |
| K | Kilograms |
| L | Liters |
| M | Metric tons (1000 kilograms) |
| N | Cubic meters |
| P | English pounds |
| T | English tons (2000 pounds) |
| Y | Cubic yards |

Table 5: Minnesota-specific hazardous waste codes

| | |
|------|--|
| MN01 | Waste exhibiting the Lethality Characteristic |
| MN02 | Lab Pack (a collection of small amounts of unrelated but compatible chemicals shipped in a common container) |
| MN03 | PCBs |
| MN04 | Used oil that will not be reclaimed or burned for energy recovery |