

Manifest Shipments of Hazardous Waste

Step 7 in the 10 steps to hazardous waste compliance

Find all at: <https://www.pca.state.mn.us/business-with-us/hazardous-waste-identification-and-management>.

A hazardous waste *manifest* is a record used to track hazardous waste shipments from the site where the waste was generated to its final recycling or disposal facility, commonly known as cradle-to-grave tracking. Manifests may be either electronic, using the U.S. Environmental Protection Agency's (EPA) e-Manifest system, or paper, using EPA Form 8700-22, the Uniform Hazardous Waste Manifest.

Hazardous waste generators remain liable forever for mismanagement of their waste, even after it leaves their site. Manifests help reduce generators' and transporters' liability by documenting proper management.

This fact sheet discusses the manifest requirements administered by the Minnesota Pollution Control Agency (MPCA), the metropolitan counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties), and the EPA.

What is the difference between a manifest and a shipping paper?

The Hazardous Materials Regulations (HMR) administered by the U.S. Department of Transportation (DOT) require a hazardous materials *shipping paper* to be used for any shipment of *hazardous material*, whether a product or waste. Most *hazardous wastes* are hazardous materials subject to DOT requirements when transported in commerce. Shipping papers must be paper, and must be carried along with the hazardous materials shipment. Paper hazardous waste manifests meet all DOT shipping paper requirements.

Learn about the difference between hazardous wastes and hazardous materials in MPCA fact sheet #w-hw0-15, 'Hazardous terms': What they mean, at: <https://www.pca.state.mn.us/sites/default/files/w-hw0-15.pdf>.

Which waste shipments require a manifest in Minnesota?

Most shipments of hazardous waste in Minnesota require a hazardous waste manifest, including shipments from Very Small Quantity Generators (VSQGs). However, the table on page 2 lists some common [hazardous wastes and shipments that are exempt from using a manifest in Minnesota](#).

Though the MPCA does not require a manifest for these shipments, the HMR may still require a hazardous materials shipping paper. For questions regarding the HMR, contact the DOT. See [More information](#) on page 4.

Who is responsible for the manifest?

The generator of a waste is responsible for completing the manifest. However, many transport vendors will provide you with either a prefilled paper manifest or prepopulated electronic manifest. Before your waste is loaded onto a transport vehicle, carefully check the information in each item of the paper or electronic manifest for accuracy. See the [by manifest item number](#) guidance on page 5 of this fact sheet.

After your waste is loaded for transport, the *offeror* must sign the paper manifest in [Item 15](#), electronically sign an electronic manifest in the e-Manifest system, or authorize a *Remote Signer* to electronically sign the electronic manifest on their behalf. The offeror is the person who prepared the waste for transport, and may be you, your transporter, or an on-site consultant. Signing the manifest does not make the offeror the generator of the waste nor responsible for its ultimate management, but the offeror is liable for false or incorrect information on the manifest as well as for improper shipping containers, packaging, or incorrect marking. The offeror must have documented training in hazardous materials characterization, shipping containers, packaging, and marking.

Hazardous wastes and shipments that are exempt from using a hazardous waste manifest in Minnesota

Continued use products	Materials that will continue to be used by you or someone else for their originally intended use are products, not regulated wastes. See MPCA fact sheet #w-hw2-42, Recycling Hazardous Waste, at: https://www.pca.state.mn.us/sites/default/files/w-hw2-42.pdf .
Contractor waste	Wastes generated by a contractor at a remote site that are transported back to the contractor's base of operations. However, PCBs are not eligible for this exception. See MPCA fact sheet #w-hw3-11, Managing Waste Generated by Construction and Service Contractors, at: https://www.pca.state.mn.us/sites/default/files/w-hw3-11.pdf .
Crude oil managed equivalent to used oil	Eligible crude oil and crude oil-contaminated sorbents managed equivalent to off-specification used oil and burned for energy recovery. See MPCA fact sheet #w-hw4-11, Crude Oil and unrefined petroleum wastes, at: https://www.pca.state.mn.us/sites/default/files/w-hw4-11.pdf .
Electronic waste (E-waste)	E-waste being shipped for recycling. See MPCA fact sheet #w-hw4-15, Managing Electronic Wastes, at: https://www.pca.state.mn.us/sites/default/files/w-hw4-15.pdf .
Feedstocks, byproducts, and sludges	Wastes that will be managed under the allowances discussed in MPCA fact sheet #w-hw2-42, Recycling Hazardous Waste, at: https://www.pca.state.mn.us/sites/default/files/w-hw2-42.pdf .
Hazardous waste transfers along or around the perimeter of contiguous property	Transfers of hazardous waste along or around the perimeter of contiguous property as long as the transfer right-of-way continuously 'touches' the contiguous property. See MPCA fact sheet #w-hw1-03, Obtain a Hazardous Waste Identification Number, at: https://www.pca.state.mn.us/sites/default/files/w-hw1-03.pdf
Hazardous waste transfers between HWIDs on contiguous property	Transfers of hazardous waste between different Hazardous Waste Identification Numbers (HWIDs) held by the same entity on contiguous property. See MPCA fact sheet #w-hw1-03, Obtain a Hazardous Waste Identification Number, at: https://www.pca.state.mn.us/sites/default/files/w-hw1-03.pdf .
Infectious waste	Infectious waste is biologically dangerous, not chemically dangerous. Though many vendors refer to infectious waste shipping documents as 'manifests', infectious waste is not subject to the hazardous waste manifesting requirements. See MPCA fact sheet #w-sw4-30, Infectious Waste: Management guidance for generators, at: https://www.pca.state.mn.us/sites/default/files/w-sw4-30.pdf .
Recyclable fuel	Contaminated fuel being shipped for reclamation under the conditions discussed in MPCA fact sheet #w-hw4-19, Fuel-related Wastes, at: https://www.pca.state.mn.us/sites/default/files/w-hw4-19.pdf .
Reverse-distributed pharmaceuticals	Pharmaceuticals that are shipped under the conditions discussed in MPCA fact sheet #w-hw3-36b, Pharmaceutical Reverse Distribution at: https://www.pca.state.mn.us/sites/default/files/w-hw3-36b.pdf .
Shipments between licensed collection programs	Shipments between Household Hazardous Waste Collection Programs, Very Small Quantity Generator Collection Programs, and Licensed Paint Collection Sites.
Sorbents being transported for laundering and reuse	Towels, wipes, and rags contaminated with a hazardous waste that are being transported for laundering. See MPCA fact sheet #w-hw4-61, Managing sorbents: towels, wipes, and rags, at: https://www.pca.state.mn.us/sites/default/files/w-hw4-61.pdf .
PCB equipment transfers within a utility's service area	Polychlorinated biphenyls (PCB) equipment being transferred by an electrical or natural gas utility or their maintenance vendor to another site operated by the utility within the utility's service area.
PFAS shipments	Most shipments of per- and poly-fluoroalkyl substances (PFAS) are not regulated hazardous wastes in Minnesota. While the MPCA does recommend managing PFAS-containing wastes equivalent to hazardous wastes, including manifesting, manifesting is not required.
Universal waste	Batteries, fluorescent and high-intensity discharge (HID) lamps, mercury-containing equipment, pesticides eligible for a collection program, dental amalgam, pretreated dental wastewater, and aerosol cans and compressed gas cylinders. See MPCA fact sheet #w-hw4-62, Universal Wastes, at: https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf .
Used oil and related wastes	Used oil, filters, and contaminated sorbents. See MPCA fact sheet #w-hw4-30, Used Oil and Related Wastes, at: https://www.pca.state.mn.us/sites/default/files/w-hw4-30.pdf .
VSQG self-transported shipments to a collection program	VSQGs transporting their own hazardous waste to a licensed collection program. See MPCA fact sheet #w-hw2-53, Requirements for Transporting Waste to a VSQG Collection Program, at: https://www.pca.state.mn.us/sites/default/files/w-hw2-53.pdf .
VSQG waste pick-ups by government-operated collection programs	Government-operated VSQG Collection Programs picking up and transporting hazardous waste from VSQGs to the VSQG Collection Program using government-operated vehicles

What happens when a hazardous waste shipment leaves my site?

Before the transport vehicle leaves your site, ensure you either receive a copy of the signed paper manifest or have signed a fully electronic manifest in the EPA's e-Manifest system. For help accessing the e-Manifest system, contact the EPA e-Manifest Help Desk. See [More information](#) on page 4.

Your transporter will take your waste to the *designated facility* in [Item 8](#) of the manifest. Along the way, your transporter may transfer your waste to secondary transporters you have identified in [Item 7](#). Your waste may also be consolidated with other compatible waste in common containers destined for the same facility.

In addition, the MPCA and EPA allow you to authorize your transporter to transfer your waste to other secondary transporters not listed on the manifest. However, the MPCA strongly recommends that you allow only secondary transporters you have researched and are confident will handle your waste properly. You remain liable for proper management of your waste even after it leaves your site.

When your shipment reaches the designated facility, a facility representative will manually or electronically sign and date the manifest. For paper manifests, the designated facility is supposed to then submit an electronic copy of the manifest to the EPA within 30 days, and the manifest information will be entered into the e-Manifest system. Electronic manifests are automatically entered into the e-Manifest system.

Do I have to send copies of my manifests to anyone?

No, the e-Manifest system routes manifest copies for generators. Do not submit manifest copies to the EPA, MPCA, or Metro Counties except upon request. Manifest submittals to the e-Manifest system are the responsibility of the designated facility receiving the hazardous waste.

Designated facilities receiving hazardous waste in Minnesota, including permitted Treatment, Storage, and Disposal Facilities (TSDFs), hazardous waste recycling facilities, commercial storers of PCBs, and any other sites receiving manifested shipments of hazardous waste, must electronically submit a copy of paper manifests to the EPA within 30 days of receipt of the shipment. Designated facilities may not receive electronically manifested hazardous waste shipments unless they are already registered with the e-Manifest system.

What are the manifest recordkeeping requirements?

As of January 22, 2025, Small Quantity Generators (SQGs) and Large Quantity Generators (LQGs) must have at least one employee register with the EPA's e-Manifest system and maintain a current account with either Site Manager or e-Manifest Certifier status. The MPCA strongly recommends that Very Small Quantity Generators (VSQGs) also register and maintain an account with one of these statuses. For instructions on registering with the e-Manifest system, visit the EPA at <https://www.epa.gov/> and search for 'e-Manifest'.

All generators must retain either a physical or electronic copy of their paper manifests until they verify that their manifest information has been entered into the e-Manifest system. After that, the official record for manifests is the EPA's e-Manifest system, and no additional recordkeeping requirements beyond maintaining the accounts above apply. VSQGs that do not maintain an e-Manifest account must continue to retain on-site copies.

All generators are also responsible for reviewing their manifests electronically in the e-Manifest system and submitting an *Exception Report* to the MPCA if their designated facility's signature for receipt of the hazardous waste is not entered into the e-Manifest system within 60 days of the original shipment date.

Are there fees for manifesting hazardous waste?

There is no fee assessed by the MPCA or Metro Counties for shipping hazardous waste or using paper or electronic manifests. However, the EPA does charge designated facilities a fee to submit manifest information to the e-Manifest system. Many disposal vendors then pass this cost along to their generator customers.

Hazardous waste generators in Minnesota must annually report the volume of hazardous wastes they generate, including wastes that are shipped off-site using a manifest as well as wastes that are sewered or treated on-site. Most generators will be assessed an annual hazardous waste licensing fee based on the volume of hazardous waste generated. For more information, see MPCA webpage, Hazardous waste licensing, at: <https://www.pca.state.mn.us/business-with-us/hazardous-waste-reporting-and-licensing>.

What are Land Disposal Restriction notices?

SQGs and LQGs must send a notice to the designated facility with the first manifest for a hazardous waste. The notice must state whether or not the waste meets the land disposal restriction (LDR) treatment standards. These standards are found in the Code of Federal Regulations (CFR) at 40 CFR 268. A generator needs to send this notice to a 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 their contracted services. Keep a copy of your LDR notices for at least three years after you last generate the waste stream. Do not submit LDR notices to the EPA or MPCA. LDRs are not entered into the e-Manifest system.

More information

Guidance and requirements in this fact sheet were compiled from Minnesota Rules, Chapter 7045 and the Code of Federal Regulations, Title 40, Parts 260 to 265, and incorporate regulatory interpretation decisions made by the MPCA on May 8, 2019, and by the EPA on May 5, 2023. To review Minnesota Rules, visit the Office of the Revisor of Statutes at: <https://www.revisor.mn.gov/>. To review the Code of Federal Regulations, visit the U.S. Government Publishing Office at: <https://www.govinfo.gov/>.

For questions on:

- **When** a hazardous waste manifest is required, contact the MPCA or your Metro County.
- **How** to use the EPA's e-Manifest system, contact the EPA e-Manifest help desk or review the frequent questions about e-Manifest posted on the EPA's website at <https://www.epa.gov/>.

The MPCA's Small Business Environmental Assistance Program (SBEAP) can provide you with free, confidential non-enforcement compliance assistance. The Minnesota Technical Assistance Program can assist you to reduce your hazardous waste generation and the need to manifest waste. Immediately report all hazardous waste spills that may reach the environment to the Minnesota Duty Officer.

Metro County Hazardous Waste Offices

Anoka	763-324-4260
.....	https://www.anokacounty.us/
Carver	952-361-1800
.....	http://www.co.carver.mn.us/
Dakota	952-891-7557
.....	https://www.co.dakota.mn.us/
Hennepin	612-348-3777
.....	http://www.hennepin.us/
Ramsey	651-266-1199
.....	https://www.ramseycounty.us/
Scott	952-496-8177
.....	http://www.scottcountymn.gov/
Washington	651-430-6655
.....	https://www.co.washington.mn.us/

Minnesota Department of Transportation

Hazardous materials	651-215-6330
.....	http://www.dot.state.mn.us/

U.S. Department of Transportation

Hazardous materials	1-800-467-4922
.....	http://www.phmsa.dot.gov/

Minnesota Pollution Control Agency

Toll free (all offices)	1-800-657-3864
All offices	651-296-6300
.....	https://www.pca.state.mn.us/

Minnesota Duty Officer

Toll free	1-800-422-0798
Metro	651-649-5451

Small Business Environmental Assistance Program

Toll free	1-800-657-3938
Metro	651-282-6143
.....	https://www.pca.state.mn.us/

Minnesota Technical Assistance Program

Toll free	1-800-247-0015
Metro	612-624-1300
.....	http://www.mntap.umn.edu

U.S. Environmental Protection Agency

e-Manifest help desk (toll free)	1-833-501-6826
e-Manifest help desk	970-494-5508
e-Manifest help desk (TSDFs)	helpdesk@epacdx.net
.....	https://www.epa.gov/

Hazardous waste manifest guidance – by manifest item number

1. Generator ID Number

Enter your site's Hazardous Waste Identification Number (HWID), also known as an 'EPA ID Number.' Do not enter 'CESQG' or 'VSQG'; you must obtain an HWID from the MPCA before shipping hazardous waste. See MPCA fact sheet #w-hw1-03; Obtain a Hazardous Waste Identification Number, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-03.pdf>.

To find the HWID for your site:

- For paper manifests, use the MPCA's What's in My Neighborhood tool at: <https://www.pca.state.mn.us/about-mPCA/whats-in-my-neighborhood>.
- For electronic manifests, use the search tool in the e-Manifest manifest creation process.

Ensure that the name of your site matches the MPCA's records. **If it does not, stop and contact the MPCA!** You may not use the HWID assigned to a previous owner of your site or to you at another site.

If shipping PCBs, do not enter '40CFRPART761' unless you do not operate a PCB Permanent Storage Area. See MPCA fact sheet #w-hw4-48c, Storing PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48c.pdf>.

2. Page 1 of

For paper manifests, if you are using a Continuation Sheet (EPA Form 8700-22A), indicate how many pages in total, including the original manifest. If not using a Continuation Sheet, 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 emergency telephone number is answered continuously until the shipment reaches its destination. Pagers and voicemail do not meet this requirement. Do not use '911', the Minnesota Duty Officer number, or any number for the MPCA or a Metro County.
- The emergency telephone number must connect to a person who is knowledgeable about your hazardous waste and has comprehensive emergency response information for the waste. Only being able to provide the information 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 then 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.
- 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 after each waste's description in [Item 9b](#).

4. Manifest Tracking Number

Paper manifests should have an imprinted unique identifying number consisting of nine digits followed by three letters. If yours does not, stop! Get another manifest. Only imprinted manifests are valid for use. Electronic manifests will be automatically assigned a unique identifying number by the e-Manifest system.

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

Enter the name of the site and your mailing address.

If the street address of the site where the waste was generated and will be shipped from is different from the mailing address, also enter the street address. If your mailing address is a post office box, you must also enter a street address.

Check that the street address you enter on the manifest matches the address to which your HWID is assigned as shown in the MPCA's What's in My Neighborhood tool at:

<https://www.pca.state.mn.us/about-mPCA/whats-in-my-neighborhood>.

If it does not match, stop! Determine whether you must obtain a new HWID to ship waste from this location.

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

Enter the company name and HWID 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 an HWID or EPA ID number may transport hazardous waste in Minnesota. Do not enter driver or vehicle information in this space.

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

If you know your transporter intends to transfer your waste to a secondary transporter before the waste arrives at the facility designated in [Item 8](#), enter the secondary transporter's information in this space. If you are using a paper manifest and more than two transporters will handle your waste, use a Continuation Sheet and complete Item 25, and if needed, Item 26.

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 facility must be one of the following:

- A permitted Hazardous Waste Treatment, Storage, or Disposal Facility (TSDF).
- A hazardous waste recycling facility that will not store your waste for more than 24 hours before recycling it. See MPCA fact sheet #w-hw2-42, Recycling Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw2-42.pdf>.
- A commercial storer of PCBs, if you are shipping only PCBs. See MPCA fact sheet #w-hw4-48c, Storing PCBs, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-48c.pdf>.

If the destination facility listed on your manifest does not meet one of these descriptions, stop!

9a. HM

Mark an 'X' if the waste on each line is also a hazardous material under the HMR. For questions regarding the HMR, contact the DOT. See [More information](#) on page 4.

9b. U.S. DOT Description

For each waste, enter required HMR information, including:

- Proper DOT Shipping Name;
- Hazard Class or Division;
- Four digit UN/NA Identification Number Identification Number; and
- Packing Group.

If applicable, also enter any applicable technical names and reportable quantity references for each waste. As discussed in [Item 3](#) above, if some wastes have a different emergency telephone number, enter the emergency telephone number for each waste in this space. If you have questions about proper DOT shipping names or other HMR information, contact the DOT. See [More information](#) on page 4.

If you are shipping more than four waste streams, enter the additional wastes in Item 27b of a Continuation Sheet (EPA Form 8700-22A). Ensure you enter the correct total number of pages in [Item 2](#).

10. Containers

Enter the number and type of container for each waste stream using these standard abbreviations:

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

11. Total Quantity

Enter the net quantity of each waste line. Use whole numbers, not decimals or fractions. You may use either gross or net weight, however, ensure both you and your transporter agree on which. If shipping a partially full container, include only the actual or estimated quantity of the waste, not the capacity of the container.

12. Unit Wt./Vol.

Enter the appropriate unit of measure for each waste stream in this space using these abbreviations:

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

13. Waste Codes

Enter the hazardous waste codes that best describe each waste line, up to six. Include any applicable Minnesota-specific waste codes below. For pharmaceuticals, use PHRM. If you enter MN02 Lab Pack wastes, also enter the specific waste codes that describe the waste in the lab pack.

MN01	Lethal characteristic waste. See MPCA fact sheet #w-hw2-05, The Lethality Characteristic, at: https://www.pca.state.mn.us/sites/default/files/w-hw2-05.pdf .
MN02	Lab pack (small amounts of unrelated but compatible chemicals shipped in a common container).
MN03	PCBs. See MPCA fact sheet #w-hw4-48a, Identifying, Using and Managing PCBs, at: https://www.pca.state.mn.us/sites/default/files/w-hw4-48a.pdf .
MN04	Used oil that will not be reclaimed or burned for energy recovery. See MPCA fact sheet #w-hw4-30, Used Oil and Related Wastes, at: https://www.pca.state.mn.us/sites/default/files/w-hw4-30.pdf .

14. Special Handling Instructions and Additional Information

Use this space to enter any additional information needed by the transporter or designated facility, such as waste profiles, waste densities, or special requirements for waste handling.

If shipping PCB wastes, you must enter required PCB information in this space. For more information, see MPCA fact sheet #w-hw4-48d, Manifest and Dispose of PCBs, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw4-48d.pdf>.

15. GENERATOR'S/OFFEROR'S CERTIFICATION

Generator's/Offerrer's Printed/Typed name

Signature

Carefully read the certification. Signing the certification entails liability to the signer.

See [Who is responsible for the manifest?](#) on page 1. Before signing, also ensure all the pre-transport

functions have been completed. See MPCA fact sheet #w-hw1-06, Treat or dispose of hazardous waste, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw1-06.pdf>.