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|  | **SOP 3.05 Manifest Signature Authority** |

# 1. Introduction

Minnesota Department of Transportation (MNDOT) and Minnesota Hazardous Waste (HW) rules require Facility staff to obtain approval from an authorized representative prior to signing [manifests](https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf) on behalf of the State. This Program shall provide a written request demonstrating specific staff are properly trained and certified to sign manifests.

# 2. Manifest signature responsibilities

2.1 The Facility person requesting manifest signature authorization is [the Program Manager]. This person shall demonstrate competent knowledge of the manifest process and related subject matter. The MPCA ensures HW transporters servicing HHW Programs have obtained “for-hire” operating authority from the [Minnesota Transportation Regulation Board](https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C/part-173).

2.2 No other Program staff shall sign manifests or shipping papers on behalf of the State until required documentation is provided and written approval is granted.

2.3 Although the HHW Program licensed transporter may prepare the manifest as part of the waste management service, this Program is still considered the HW generator and is ultimately responsible for accuracy of all manifest content, including:

* Generator HW ID number.
* Facility name and address.
* Shipper and transporter’s name, ID number, signature, and shipment date.
* The content of all manifest pages.
* Keeping records that include both the “two” and “three signature” manifest page(s) and the Land Disposal Restriction Form for at least three years.

2.4 MNDOT states: “Occupational Safety and Health Administration (OSHA) or U.S. Environmental Protection Agency (EPA) training conducted by employers to comply with the requirements of those agencies may be used for compliance with MNDOT Training, to the extent that training addresses the MNDOT requirements.”

Facility staff signing manifests on behalf of the State shall be able to demonstrate successful completion of HHW State-sponsored (or equivalent) training, including:

* MNDOT Initial (three-year training cycle) and refresher updates, including immediate instruction on safety, regulatory changes, and In-depth Security.
* MNDOT web-based and/or CD “[Hazardous Materials Transportation Training Modules](https://dothazmat.vividlms.com/)”.
* OSHA Safety and Health initial and annual refreshers.
* Annual Hazard Categorization as it relates to job functions that interface with commercial transporters including HW container packaging, marking, or labeling.
* Generators, transporters, and designated facilities may access information from any manifest on which they are named. Review the [EPA](https://www.epa.gov/e-manifest) instructions on registering with the e-Manifest system or to view manifests.

**3. Obtaining approval to sign manifests**

**3.1** Program staff requesting manifest signature authorization shall receive approval within six months of starting employment. Approvals are only required one-time per staff, provided all required trainings are properly attended on a routine and/or mandatory basis.

**3.2** Program staff requesting manifest signature authorization shall ensure the following documentation is available upon request for review:

1. Training course records (e.g., class agenda, certification, test copies) for the previous 3 years, including:
* Safety and Health.
* RCRA HW training requirements (e.g., shipping papers and/or manifests).
* Haz-Cat as it relates to job functions that interface with commercial transporters (e.g., packaging, and marking or labeling HW containers).
* MNDOT and MNDOT Security.
1. Site-specific, detailed, and written Program plans for each of the above training areas.

**3.3** It is recommended that the employer of the person requesting manifest signature authorization read this SOP. To obtain manifest signature authority, the employer is required to provide the State’s authorized representative with a written request describing:

* The purpose (Manifest Signature Authorization).
* Specific name(s) of Facility staff for which authorization is requested.
* Statements certifying that the person requesting manifest signature approval has:
	1. Successfully completed HW training as it relates to manifesting requirements for specific job duties (Haz-Cat, Safety and Health, and DOT).
	2. Been tested on the above training (see Attachment A of this SOP) and in accordance with this Programs’ specific and written plan(s).

**3.4** The State’s authorized representative retains the right to disapprove manifest signature authorization requests if staff are unable to demonstrate all the above requirements.

**3.5** After receiving approval from the State’s authorized representative to sign manifests, this Program shall continue to train and test staff.

Attachment A

Manifest Signature Authorization (Sample) Internal Exam

Packing, Storage, and Transportation - Test 1

(Keep a completed copy of this test in individual staff training file.)

1. When storing hazardous waste at this HHW Facility, responsible staff need to:
	1. Not worry about keeping incompatible materials away from each other since there is no danger of accidents.
	2. Use any type of lab packs and drums, as DOT-approved containers are not important.
	3. Stack drums several layers high to save space.
	4. Place closed-out containers in designated Facility storage areas.
2. When preparing containers for shipment, labels are not required.
	1. True
	2. False
3. Waste disposal paperwork shall be kept on file.
	1. True
	2. False
4. There is no reason to use pH paper on items that appear to be acids.
	1. True
	2. False
5. Labeling and marking of containers shall be completed:
	1. When first opened.
	2. The day before the hazardous waste contractor has scheduled a pick-up.
	3. When closed out.
	4. Only when staff can’t remember what was placed into the container.
6. All hazardous waste containers shall be:
	1. Inspected at least once a week for leaks.
	2. Be properly marked and labeled.
	3. Placed so all containers can be easily viewed (adequate aisle space).
	4. Placed anywhere in the Facility where there is extra room.
	5. A, B, and C.
7. When arranging for a pick-up of hazardous waste by the shipping contractor, staff shall:
	1. Have a basic idea of what will be shipped out.
	2. Stack all containers outside a week ahead of time, so they are ready to go.
	3. Send lab pack inventories and number of bulk drums to the contractor a week prior to the pick-up date.
	4. Do nothing until the contractor arrives, since staff is unsure of how much truck space will be available.
8. To prepare for the scheduled hazardous waste pick-up day, staff shall:
	1. Separate all containers into distinct categories.
	2. Stage containers to make it easier to load with a forklift.
	3. Have sufficient container aisle space.
	4. Arrange containers so labels are visible.
	5. All the above.
9. When lab packing hazardous waste, staff shall always wear a full-face respirator.
	1. True
	2. False
10. It is necessary to open each container when lab packing hazardous waste.
	1. True
	2. False
11. If a lab pack container requires an inventory, keep a copy:
	1. In the Facility files.
	2. On the container.
	3. To forward to the disposal contractor.
	4. In the solid waste as no packing lists are needed.
	5. A, B, and C.
12. The use of poly UN-approved drums is required for acid lab packs.
	1. True
	2. False
13. Using liners in fiber lab pack drums is considered optional.
	1. True
	2. False
14. Maximum allowed storage time for closed-out hazardous waste containers at this Facility is:
	1. One month
	2. 90 days
	3. 180 days
	4. As long as needed.
15. Program staff is responsible for ensuring correct shipping labels and/or markings are used.
	1. True
	2. False
16. Class 8 corrosives can be loaded above or adjacent to ANY type of hazmat.
	1. True
	2. False
17. To safely transport hazmat, staff shall ensure:
	1. All labels are facing in the same direction.
	2. Incompatible containers are segregated.
	3. Each container is secured against movement.
	4. B and C
	5. All the above.
18. Common incompatible hazmat that should be segregated includes:
	1. Acids and bases.
	2. Acids and cyanides.
	3. Acids and pesticides.
	4. Oxidizers and ignitable or flammables.
	5. Oxidizers and pesticides.
	6. All the above.
19. Shipping paper and/or manifest accuracy is the responsibility of:
	1. The transporter shipping the hazmat.
	2. The receiving or end disposal facility.
	3. The generator.
	4. A and B
20. Each class of hazmat is required to be transported in a specific type of container because:
	1. It prevents incompatibility and/or chemical reaction problems.
	2. Leaks will be contained.
	3. All the above.
	4. None of the above.
21. A container is considered to be DOT approved for shipment if it displays the UN symbol and:
	1. Is compatible to the waste stored inside.
	2. Is securely closed.
	3. Is not leaking.
	4. B and C
	5. All the above.
22. A green colored label is used to indicate:
	1. GO
	2. Dangerous when wet.
	3. Non-flammable gas.
	4. None of the above.

Manifest Signature Authorization (Sample) Internal Exam

 Hazardous Waste Categorization - Test 2

1. When receiving hazardous waste, staff shall:
	1. pH each container.
	2. Segregate items into specific packing classes.
	3. Place all waste on a cart and lab pack whenever it is convenient to do so.
	4. Mix as many container contents together as possible to save space and money.
2. It is okay to:
	1. Lab pack acids and bases together since they are both class 8 corrosive materials.
	2. Bulk unknown fluids into a solvent drum without prior testing.
	3. Bulk liquid dioxins into a solvent drum since they are also flammable.
	4. Lab pack small flammable items into a “Direct Charge” container rather than bulking them.
3. When an UNKNOWN material is received, staff shall:
	1. Open the container immediately to see what is inside.
	2. Place the container into a waste category staff thinks is most correct.
	3. Ask the participant bringing in the item what the waste is.
	4. Smell contents to determine waste type.
4. If picric acid is received, staff shall first:
	1. Open the container and bulk the contents with other acids.
	2. Call the local police, who will contact the bomb squad since it will definitely explode immediately.
	3. Visually inspect the container for crystallization and do not attempt to open.
	4. Shake the container vigorously and watch for a reaction.
5. Hazardous waste items can be lab packed into any type of box, drum, or container.
	1. True
	2. False
6. Acceptable absorbent packing materials may include:
	1. Crumpled up newspaper.
	2. Styrofoam shipping peanuts.
	3. Nothing
	4. Vermiculite
7. All acids (organic and inorganic) may be packed together in the same lab pack.
	1. True
	2. False
8. Keep water base separate from oil base while bulking paints.
	1. True
	2. False
9. To document or track a lab pack or bulk container, staff shall:
	1. Assign a unique number.
	2. Enter the waste type, weight or size, and date shipped into the Facility drum logbook.
	3. Mark and/or label following DOT and hazardous waste regulations.
	4. A, B, and C
10. Cyanide items shall be:
	1. Thrown into the solid waste since they pose no danger.
	2. Packed per individual type.
	3. Packed with other pesticides.
	4. Placed on product reuse/exchange shelves.
11. When testing unknown wastes, if the pH paper indicates 0 to 1 pH, the item shall be:
	1. Packed as inorganic acid.
	2. Packed as organic acid.
	3. Packed as alkaline.
	4. Poured into the sewer since 0 to 1 pH is considered neutral.
12. When selecting materials for bulking, the waste type needs to be:
	1. pH of >5 and <10.
	2. Nonpathogenic
	3. Nonreactive
	4. All the above.
13. When labeling waste containers, the primary label (four-inch sticker) is:
	1. Not needed.
	2. Placed anywhere you feel it should go.
	3. Placed on top only.
	4. Placed on top and one side of the container.
14. To properly categorize a waste type for lab packing, staff shall refer to:
	1. The Haz Cat manual.
	2. Web reference sites such as [www.hazard.com](http://www.hazard.com).
	3. Chemical reference book.
	4. The State-contracted HW disposal company for help.
	5. Any of the above.
15. Only new drums/lab packs/boxes may be used as hazardous material waste shipping containers.
	1. True
	2. False
16. Hazmat employees MUST receive training at least every:
	1. 3 years
	2. 4 years
	3. 5 years
	4. 90 days

**Attachment B**

**Manifest Signature Authorization**

**Sample Internal Exam Key Answers for Attachment A**

**Packaging, Storage, and Transportation Test Key:**

d

b

a

b

a

e

c

e

b

b

e

a

b

c

a

b

d

f

c

c

e

d

**Hazardous Waste Categorization Test Key:**

b

d

c

c

b

d

b

a

d

b

a

d

d

e

b

a