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|  | **SOP 4.13 Manifests and Shipping Papers**  General Guidance for HHW Programs |

# 1. Introduction

*Note: This guidance document is for informational purposes only and outlines basic Department of Transportation (DOT) employer requirements. The MPCA makes no guarantee that this document satisfies the requirements of its users ensuring DOT compliance. It is the sole responsibility of your specific HHW Program employer(s) to determine if DOT requirements have been met.*

This SOP provides guidance for proper transport of hazardous wastes (HW) brought in and/or shipped from a Household Hazardous Waste (HHW) facility. All manifested HW being shipped from a HHW facility must be transported using a [licensed HW transporter](https://www.revisor.mn.gov/rules/?id=7045.0351) regulated by both [DOT](https://www.pca.state.mn.us/sites/default/files/w-hw2-53.pdf) and [MPCA](https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf). The term “shipping papers” is the overarching DOT term that includes [manifests,](https://www.revisor.mn.gov/rules/7045.0261/) bills of lading, invoices or documents used to accompany transported HW. The use of a manifest vs. a more generic shipping paper is based on whether the MPCA declares a material to be [hazardous](https://www.pca.state.mn.us/sites/default/files/w-hw0-15.pdf), [universal](https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf), or solid waste. Copies of manifests and shipping papers shall be kept for a time period of at least three years and be made accessible for inspection by this HHW Facility.

# 2. Manifests

Manifests are used for outgoing HW shipments by a [commercial transporter](https://www.revisor.mn.gov/rules/?id=7045.0397) and provides a ‘cradle-to-grave’ record tracking the HW from a point of origin (HHW facility or event) to the specified destination. The HW shipped using a Uniform Manifest follow requirements found in both [DOT](https://www.fmcsa.dot.gov/regulations/hazardous-materials/how-comply-federal-hazardous-materials-regulations) and [MPCA statutes](https://www.revisor.mn.gov/statutes/?id=221.037), and the contract or Joint Powers Agreement between the MPCA and this HHW Program. These training requirements must be met before Program staff is authorized to sign a manifest on behalf of the State.

2.1 Authorization. To sign manifests on behalf of the MPCA, the HHW Program must provide written documentation to the State demonstrating that its staff and its contractor’s staff have been trained in accordance with [**DOT Code of Federal Regulations (CFR) 49**](https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C/part-172/subpart-H/section-172.704) and are certified by their employer to sign manifests on behalf of the agency.

2.2 **Staff training,** MPCA manifest approval and certification records should be maintained in a central file location for each qualified staff person.

**2.3** **Government Exception.** HHW Programs may transport waste from mobile collection events to facilities if the waste is transported in a Program owned government vehicle by trained program staff.

**2.4 Manifest Review**. [Manifests](https://www.revisor.mn.gov/rules/7045.0261/) are prepared by the Program’s transporter and are provided to the facility staff listed above for review before signature. Program staff shall review the manifest to ensure accuracy before shipping. Although the transporter often fills out the manifest, the HHW Program staff is ultimately responsible to ensure manifests are completed correctly prior to signature. Prior to signing manifest documents, stall shall review for accuracy this facility’s   
HW ID #, site address, telephone number and the destination facility the HW is being shipped to; the final destination must be at a permitted Hazardous Waste Treatment, Storage, or Disposal Facility.

**2.5 Land Disposal Restrictions (**[**LDR**](https://www.epa.gov/hw/land-disposal-restrictions-hazardous-waste)**).** All listed or characteristic HW shipped on a manifest must have a LDR notification form stating the HW it does not meet the LDR treatment standards. The LDR’s are provided to the shipper by the contracted hauler but are not required to accompany shipments that do NOT use a manifest.

# 3. Shipping Papers

Certain waste types may be transported using a [Shipping Paper](https://www.pca.state.mn.us/sites/default/files/w-hw2-53b.doc) which does not require the level of detail or contain all the components of a Uniform Manifest. The shipping paper shall be completed if your HHW Program is licensed to accept business generated HW and must be filled out prior to the truck leaving the generators site and prior to transport of HW into your HHW facility. Businesses bringing in waste to a licensed Very Small Quantity Generator (VSQG) HHW Program may be allowed relief using the [Materials of Trade](https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C/part-173/subpart-A/section-173.6) DOT exemption; see Attachment A.

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| **Collection program shipments** | Shipments from one licensed hazardous waste collection program to another, including between Household Hazardous Waste Collection Programs, VSQG Collection Programs, and Paint Collection Sites |
| **Continued use** | Wastes that will continue to be used by you or someone else for their originally intended use. 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** | Contractors shipping waste they generated at a remote site back to their base of operations. Manifests are still required for wastes containing polychlorinated biphenyls (PCBs). 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** | Crude oil and crude oil-contaminated sorbents eligible to be managed equivalent to off-specification used oil that will be burned for energy recovery. See MPCA fact sheet #w-hw4-11, Crude Oil and Petroleum Wastes, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-11.pdf>. |
| **Electronics waste (E-waste)** | Electronics 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 sludge’s** | Wastes that will be used or reclaimed 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>. |

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| **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 for Generators, at: <https://www.pca.state.mn.us/sites/default/files/w-sw4-30.pdf>. |
| **Reverse-distributed pharmaceuticals** | Pharmaceuticals that are shipped under the conditions discussed in MPCA fact sheet #w-hw3-36b, Reverse Distribution of Pharmaceuticals, at: <https://www.pca.state.mn.us/sites/default/files/w-hw3-36b.pdf>. |
| **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>. |
| **Universal waste** | Fluorescent and high-intensity discharge (HID) lamps, batteries, aerosol cans, compressed gas cylinders, mercury-containing devices, dental amalgam, pretreated dental wastewater, and pesticides eligible for a collection program. See MPCA fact sheet #w-hw4-62, Managing Universal Wastes, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf>. |
| **Used oil** | Used oil, filters, and contaminated sorbents. See MPCA fact sheet #w-hw4-30, Managing Used Oil and Related Wastes, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-30.pdf>. |
| **VSQG self-transport to a collection program** | VSQGs may transport their own hazardous waste to a licensed collection program without using a manifest. See MPCA fact sheet #w-hw2-53, Requirements for Transporting Waste to a Very Small Quantity Generator Collection Program, at: <https://www.pca.state.mn.us/sites/default/files/w-hw2-53.pdf>. |

Attachment A - **HHW Example Program Shipping Paper**

Page 1 of \_\_\_\_\_

In Emergency event, call 911 and the Minnesota Duty Officer

@ 1-800-422-0798 or (612) 649-5451

**Facility Emergency Contact Number :­\_\_\_\_\_\_\_\_\_\_**

**(Facility staff must be aware of wastes stored on site).**

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| **Generator name:** | **Collection program name and site address:** | |
| **Address:** |
| **HW ID #:** |
| **HHW Program contact information** |
| Name: |
| Phone number: |
| **Shipping description** | **Packing type & count** | **Total quantity**  (List units of measure) |
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***Certification:*** *I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, labeled and are in all respects in proper condition for transportation by highway according to applicable national and international government regulations.*

Company rep name: (print) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (sign) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_

Driver name: (print) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (sign) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_

Date of acceptance by carrier: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

***Certification:*** *I certify I have received the waste listed on this shipping paper.*

Program rep: (print) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (sign) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_

**When signed this is your receipt. Keep it for 3 years.**