

Manifest Shipments of Hazardous Waste

Step 7 in the [10 Steps to Hazardous Waste Compliance series](#)

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 any mismanagement of their waste, even after it leaves their site. Manifests help provide generators and transporters with liability protection by documenting that the waste reached its intended destination.

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, including those from Very Small Quantity Generators (VSQGs), require use of a hazardous waste manifest. However, some hazardous wastes and shipment categories are exempt from using a manifest. See [Table 1](#) on page 2.

Waste polychlorinated biphenyls (PCBs) shipments must use a hazardous waste manifest. 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>.

Who must complete a manifest?

The generator of a waste is responsible for making sure the manifest is complete and accurate. Many transport and disposal vendors, however, will provide you with either a prefilled paper manifest or a prepopulated e-Manifest. Before your waste is loaded on the transport vehicle, carefully check the information in each item of the paper or electronic manifest for accuracy. See the [Item-by-item guidance](#) on page 5 of this fact sheet.

After your waste is loaded for transport, the *offeror* must sign the paper manifest with a pen in [Item 15](#) or log in and sign the electronic manifest in the e-Manifest system. The offeror is the person who prepared the waste for transport. You, your transporter, or an on-site consultant may be the offeror. Signing the manifest does not make the offeror the generator, but does make the offeror liable for false or incorrect information on the manifest as well as improper shipping container packaging, labeling, or loading.

For instructions on registering with the e-Manifest system to sign manifests electronically, visit the EPA at <https://www.epa.gov/> and search for 'e-Manifest'.

Table 1. Hazardous wastes and shipments not required to use a hazardous waste manifest in Minnesota

If your waste shipment is not described in Table 1 below, you must use a hazardous waste manifest.

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	Crude oil and crude oil-contaminated sorbents eligible to be managed equivalent to off-specification used oil and 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 .
Electronic 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 sludges	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 .
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 .
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, Reverse Distribution of Pharmaceuticals, at: https://www.pca.state.mn.us/sites/default/files/w-hw3-36b.pdf .
Shipments between collection programs	Shipments between licensed hazardous waste collection programs, including 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 .
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(n) HWID, at: https://www.pca.state.mn.us/sites/default/files/w-hw1-03.pdf .
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	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 .

Note: Though the MPCA does not require use of a Uniform Hazardous Waste Manifest for some waste shipments, the HMR may still require use of a hazardous materials shipping paper. For questions about whether a shipping paper is required, contact the DOT. See [More information](#) on page 4.

What happens when the shipment leaves my site?

Before the transport vehicle leaves your site, ensure you either receive a copy of the signed paper manifest or can access the signed electronic manifest in the EPA's e-Manifest system. For problems 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 hazardous waste facility designated on the manifest in [Item 8](#). Along the way, your transporter may transfer your waste to another transporter you have identified in [Item 7](#).

The MPCA and EPA allow you to authorize your transporter to transfer your waste to one or more secondary transporters not listed on the manifest. However, the MPCA strongly recommends that you only allow 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 is picked up by a transporter.

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 must then submit a copy of the manifest to the EPA within 30 days. The EPA will enter the manifest information into the e-Manifest system. Electronic manifests are automatically entered into the e-Manifest system when the facility representative signs them.

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

No, the e-Manifest system does this for you. Hazardous waste generators in Minnesota should not submit manifest copies to the EPA, MPCA, or Metro Counties except upon request. All manifest submittals to the e-Manifest system are performed by the designated facilities receiving 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 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 registered with the e-Manifest system to electronically sign and date manifests.

What are the manifest recordkeeping requirements?

Generators must retain a copy of paper manifests they sign until the manifest information is entered into the e-Manifest system. The official record for manifests is the information contained in the EPA's e-Manifest system.

Generators are 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 45 days of the original shipment date.

Generators, transporters, and designated facilities may access information from any manifest on which they are named. For instructions on registering with the e-Manifest system to view your manifests, visit the EPA at <https://www.epa.gov/> and search for 'e-Manifest'.

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/waste/hazardous-waste-licensing>.

What are Land Disposal Restriction notices?

Small Quantity Generators (SQGs) and Large Quantity Generators (LQGs) must send a notice to the designated facility with the first manifest for a 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. 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. To review Minnesota Rules, visit the Office of the Revisor of Statutes at: <https://www.revisor.mn.gov/pubs>. To review the Code of Federal Regulations, visit the U.S. Government Publishing Office at: <https://www.govinfo.gov/>.

For questions on:

- **Which** wastes and shipments require use of a hazardous waste manifest, contact the MPCA or your Metro County.
- **How** to access or 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.

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 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	763-422-4260
.....	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/sbeap/

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.....	1-833-501-6826
e-Manifest help desk.....	helpdesk@epacdx.net
.....	https://www.epa.gov/

Hazardous waste 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.' Do not enter 'CESQG' or 'VSQG'. You must obtain an HWID from the MPCA before shipping 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 Advanced Search tab in the MPCA's What's in My Neighborhood tool at: <https://cf.pca.state.mn.us/wimn/search.cfm>.
- For electronic manifests, use the search tool in the e-Manifest search creation process.

Ensure that the name of your site matches the MPCA's or EPA'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.

Do not enter '40CFRPART761' unless you are shipping only PCBs and do not operate a PCB permanent storage area as discussed in 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, 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', the Minnesota Duty Officer number, or any number for the MPCA or Metro County.
- The emergency telephone number must connect to a person who is knowledgeable about your hazardous waste and has comprehensive, product-specific, emergency response and incident mitigation information for the waste, or has immediate access to a person with such knowledge and information. Providing only 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 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://cf.pca.state.mn.us/wimn/search.cfm>. If it does not match, stop! Contact the MPCA to 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 another transporter before the waste arrives at the facility designated in [Item 8](#), enter the second 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 Items 25 and 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

For each line-itemed waste you identify in Item 9b, mark an 'X' if the waste 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 line-itemed waste, enter the information specified under the HMR, including 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 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:

Table 2. Standard abbreviations for types of containers

BA	Burlap, cloth, paper, or plastic bags	DM	Metal drums, barrels, kegs
CF	Fiber or plastic boxes, cartons, cases	DT	Dump truck
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)

11. Total Quantity

Enter the net quantity of each waste stream in this space; use whole numbers without any decimals or fractions. Either gross or net weight of the waste may be entered, however ensure both you and your transporter agree on which measure is used. If you are shipping a partially full container, include only the actual or estimated quantity of the waste shipped, 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:

Table 3. Units of measure abbreviations

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

13. Waste Codes

Enter the applicable hazardous waste codes for each waste stream, up to a maximum of six. If the waste has more than six codes, enter the six codes most representative of the waste. You must include any applicable Minnesota-specific waste codes shown in Table 4. If you ship Lab Pack wastes, also enter any non-redundant waste codes, up to a maximum of five, in addition to the MN02 waste code.

Table 4. Minnesota-specific hazardous waste codes

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

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 enter the required TSCA information in this space. For more information on TSCA manifesting requirements, 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

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

16. Generator's/Offerror's Printed/Typed name

Any person signing a manifest, either on paper or electronically, under the HMR must have documented training in hazardous materials packaging, labeling, and manifesting, called pre-transport requirements. Before you sign the manifest, ensure pre-transport requirements have been met. 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>.

For paper manifests, 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. If another person from the same entity signs on behalf of the person whose name is already preprinted on the manifest, write "On behalf of" immediately to the right of the preprinted name before signing.