

CELLY SERVICES, INC.

Environmental, Health and Safety Services

Changes to Hazardous Waste Manifest

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Background: Present US law requires that most hazardous waste be transported from hazardous waste generators (dealerships) to permitted recycling, treatment, storage, or disposal facilities (TSDF) by registered hazardous waste transporters, and that each shipment be accompanied by a hazardous waste manifest. The manifest is the document that provides information for “cradle-to-grave” tracking of the hazardous waste.

The good news is that the dealers in California and other states do not have to manifest used oil, used coolant, used oil filters or any of the Universal Wastes. The only waste that is regularly manifested to disposal from dealerships’ is their clarifier sludge. As of July 2000, manifests were no longer required in California for parts cleaning solvent (both water based and petroleum based) even though certain haulers continue to manifest the parts washer waste.

Every state had a different manifest and believe me; they were as different as they could be. California had a six-page manifest with blue, white and yellow colors. Texas, Arizona and Alabama each had them in different colors and formats. In summary, keeping track of manifests was a state-to-state mission and confusing at best. Now the Feds have marched in with a new manifest applicable to one and all in every state.

A New Law: Federal EPA revised the Hazardous Waste Manifest Forms used to track hazardous waste from a generator’s site to the site of its disposition. Handlers of waste will obtain new forms from any source that has registered with EPA to print and distribute the form. Please note that existing forms must be used until September 4, 2006, and the new Uniform Hazardous Waste Manifest must be used starting on September 5, 2006. A sample manifest is attached. Some of the changes that impact dealerships are as follows:

- Standardize the Content and Appearance of the manifest form across states
- Available from greater number of sources (*your hauler will bring you one*)
- Adopt standardized handling codes for use by receiving facilities
- Eliminate state only fields, except for state waste codes
- Prohibit states from requiring any other information (*thank heavens!*)
- Provide space for generators to specify 24-hour emergency phone number (*your waste hauler will provide one, possibly from a national emergency provider such as Chemtrec or Infotrac*)

Some states may require the dealership to mail a copy to the state with 30 days of disposal even though there is no such designated copy in the manifest. The addresses for mailing a copy in California and Arizona are as follows:

DTSC Generator Manifests
PO Box 400
Sacramento, CA 95812

ADEQ ([Manifest Enclosed](#))
1110 W. Washington Street
Phoenix, AZ 85007

The article was authored by Sam Celly of Celly Services, Inc. Sam has been helping automobile dealers comply with EPA & OSHA regulations in California, Nevada, Arizona, Hawaii & Idaho since 1987. Sam received his BS & MS in Chemical Engineering followed by a JD from Southwestern University. Sam is a Certified Safety Professional & a Registered Environmental Assessor (CA). Your comments/questions are always welcome. Please send them to sam@cellyservices.com.