

Frequent Hazardous Waste Manifest Errors

Hazardous waste generators in all states must use the universal hazardous waste manifest. You should review your manifests to ensure you don't make these common mistakes which could lead to correction fees and enforcement efforts for your company.

Missing information: No EPA Identification Number for generator, transporter, or facility; no container counts; no quantities, missing waste codes and dates, and missing second transporter when one will be used. Also, EPA ID Numbers have a combination of 12 digits and letters - any more or less and you know you have a problem.

Inaccurate information: Numbers transposed, particularly EPA ID Numbers, incorrect dates; using the wrong unit of measure (such as tons when the waste should be in pounds); incorrect container counts or quantities; using decimals or fractions in Total Weight.

Pre-printed waste streams not struck out: If you use pre-printed manifests and you do not fully line-out all waste streams that are not going to be used, subsequent transporters, destination facilities, and regulators cannot determine whether you forgot to put in a quantity, the waste got lost. Be sure to draw the line all of the way through the fields in that section, from margin to margin.

Generator and transporter name and identification number are mismatched: The names used on the manifest for the generator and transporter should be exactly the same as they appear as assigned to the EPA ID number and transporter registration, respectively. The generator's site address should match what is on record, as well.

Generators shipping past the authorized time-frame: Large quantity generators must ship every 90 days and small quantity generators must ship every 180 days.

Generally, you can correct most errors on manifests by sending your state's environmental agency a manifest correction letter. You can use one letter to report a set of manifests on which the same correction applies. However, it is much easier to verify that the information is correct on the manifest before the driver leaves your site.