

POTPOURRI
Department of Environmental Quality
Office of the Secretary
Legal Affairs Division

Federal Hazardous Waste Manifest Implementation
(0510Pot1)

The Environmental Protection Agency (EPA) has established new requirements revising the Uniform Hazardous Waste Manifest regulations and the manifest and continuation sheet forms used to track hazardous waste from a generator's site to the site of its disposition. The revisions will standardize the content and appearance of the manifest form and continuation sheet (Forms 8700-22 and 22a), make the forms available from a greater number of sources, and adopt new procedures for tracking certain types of waste shipments with the manifest. The latter types of shipments include hazardous wastes that destination facilities reject, wastes consisting of residues from nonempty hazardous waste containers, and wastes entering or leaving the United States.

The Uniform Hazardous Waste Manifest rules by USEPA/USDOT shall become effective September 5, 2006. The Louisiana Department of Environmental Quality (LDEQ) will no longer have authorization to require hazardous waste handlers to acquire from LDEQ and use the Louisiana Uniform Hazardous Waste Manifest. After the effective date of the new manifest rules (September 5, 2006), Uniform Hazardous Waste Manifest forms must be obtained only from EPA-registered and approved sources. These sources must apply for registration by submitting the required information regarding the strict manifest form printing and tracking requirements specified by the new rule and then obtain express authorization by the EPA to be a manifest form printer/provider. The LDEQ will not become an EPA manifest form printer/provider. However, the LDEQ has anticipated the need for Louisiana Uniform Hazardous Waste Manifest forms based on previous order statistics and will have supplies up to the rule effective date of September 5, 2006. Until the effective date of the new rule, LDEQ will continue to make its current supply of manifest forms available to hazardous waste handlers that must use the forms in compliance with the applicable regulations in LAC 33:Part V, Louisiana Hazardous Waste Regulations. If these supplies become exhausted before the effective date of the new rule, LDEQ will refer hazardous waste handlers' requests for manifest forms to any other available source that provides manifest forms under its authorization and regulations, i.e., EPA, other authorized manifest state, EPA-approved new manifest form supplier, etc. After the effective date of the new rule (September 5, 2006), the LDEQ will refer manifest form requests to the EPA registry of approved new manifest form providers/printers.

You may access the *Federal Register*, 70 FR 10814 (March 4, 2005), to read the complete final rule. Contact Sheryl Grimmer, Office of Environmental Services, for further information at 225-219-1665 or Sheryl.grimmer@la.gov.

Herman Robinson, CPM
Executive Counsel