

US EPA ARCHIVE DOCUMENT

Frequently Asked Questions

1. Can I submit multiple form samples to the EPA Manifest Registry for approval?

Yes. There is nothing in the regulations to prevent a registrant from submitting multiple sets of samples to the Manifest Registry under section 262.21(d). EPA expects that registrants will be forward-looking when they apply to the Manifest Registry. For example, some registrants might want to get approved for two paper types so they have flexibility to use one paper type or the other in the event that one paper type is discontinued by the manufacturer or goes up in price. If a registrant would like to get approved for two paper types, it must submit form samples for each type of paper, to get approval for both paper types.

2. Must I submit a continuation sheet sample to the Manifest Registry under section 262.21(d)?

The regulations (262.21(d)(3)) state that you do not need to submit samples of a continuation sheet if you intend to print the continuation sheet using the same paper type, paper weight of each copy, ink color of the instructions, and binding method as your manifest form samples. However, we have found errors in continuation sheet samples provided by applicants. For that reason, we believe it is advisable that you provide samples of the continuation sheet when you provide samples of the manifest.

3. How much information must be provided in the initial application and how must it be organized?

Each registrant should use its discretion to determine the appropriate amount of information to submit. If its printing arrangement is straightforward, its application may be relatively simple. EPA encourages all registrants to review the guidances posted on our Web site for preparing the initial application and form samples. These documents will give you an idea of our expectations regarding your application materials.

You will note that there is no application form. Registrants are free to organize their applications as they want. Of course, it makes sense to organize them as clearly as possible. This will help to prevent questions from EPA on the application. In general, the application should be organized so EPA can easily determine whether all of the requirements of section 262.21(b) have been met.

4. What situations might exempt me from having to submit form samples under 40 CFR 262.21(d) or (h)(3)?

Section 262.21(j) provides that EPA may, at its discretion, exempt a registrant from the requirement to submit a form sample under section 262.21(d) or (h)(3). A registrant may request an exemption from EPA by indicating why an exemption is warranted. We envision several reasons why a registrant might request an exemption.

For example, it would not be unusual for two or more registrants to rely on the same commercial printer to print their forms under the Manifest Registry. If a commercial printer prints the manifest on behalf of an approved registrant and then, subsequently, a second registrant applies to use that same printer, we do not believe it is necessary for the second registrant to submit new form samples under section 262.21(d), so long as the same printer will be printing the manifest using the same paper type, paper weight, ink color of the instructions and binding method of the form samples approved for the first registrant. After the printer's forms get approved the first time, the second registrant could submit the printer's original form samples for evaluation under the Manifest Registry. Once approved under section 262.21(e), the second registrant must use that printer to print its forms according to the specifications at section 262.21(f), as well as the paper weight, paper type, ink color of the instructions, and binding method of the printer's originally approved form samples. It also must pre-print a unique manifest tracking number on each manifest using its approved suffix.

Another common situation would be where a registrant gets approved to print a manifest using a certain paper type, paper weight, ink color of the instructions, and binding method, and subsequently wants to change one or more of these specifications. Under section 262.21(h)(3), the registrant must submit three form samples and get EPA approval. We believe the section 262.21(h)(3) requirement is important for evaluating whether a registrant's revised manifest meets the specifications at section 262.21(f). However, there might be some exceptions to this.

For example, we do not believe we need to evaluate a revised form sample if we are aware that the revised specifications have already been approved for another registrant. As we evaluate and approve form samples under sections 262.21(e) and (h)(3), we may post approved form specifications (*e.g.*, paper type, paper weight) on our Web site. If an approved registrant would like to change one or more of its form's specifications to another approved specification on our Web site, the registrant may notify EPA that it intends to do so, in lieu of submitting revised form samples. EPA could then relieve the registrant of the requirement to submit revised form samples.

5. Can I typeset the form after I am approved to print the manifest?

Typesetting the form subsequent to approval under section 262.21(e) is strongly discouraged. As provided by section 262.21(i), if, subsequent to its approval under section 262.21(e), a registrant typesets its manifest and continuation sheet instead of using the electronic file of the form samples approved by EPA, it must submit a sample of the manifest and continuation sheet to the Manifest Registry for approval. EPA recognizes that most registrants that get approved will print one or more batches of forms for use or sale. After the print jobs are done, the printer will destroy or recycle the printing plate and move on to the next print job. When it wishes to print more manifests, the printer will need to create a new printing plate.

We are not requiring the registrant to resubmit a sample of its approved manifests each time it develops a new printing plate. After it is approved under section 262.21(e), we fully expect it to save the electronic file of its approved samples in its computer system to recreate its printing plate when needed.

6. **Section 262.21(b)(5)(ii) requires the initial application to explain “other quality procedures to be followed by each establishment and printing company to ensure that all required print specifications are achieved consistently and that printing violations are identified and corrected at the earliest practicable time.” Would you please give me some suggestions on how to satisfy this requirement?**

We recommend that, as an initial step, you refer to the “Instructions for Preparing Application Materials for Submittal to EPA’s Manifest Registry,” which is posted at EPA’s Manifest Registry web site. The *Instructions* describe our expectations for the initial application’s contents, as well as for the form samples.

As stated in the *Instructions*, your application must describe the quality assurance/quality control (QA/QC) systems and methods to be used in printing forms to ensure that your organization and unaffiliated organizations, if any, will satisfy the print requirements of section 262.21(f) and print the manifest using the paper type, paper weight of each copy, ink color of the instructions, and binding method of your approved form samples. It is not satisfactory to state simply that your operations are state-of-the-art and will produce high-quality forms. Rather, we recommend that you present actual examples of the types of QA/QC methods to be used in the printing operations to ensure compliance with these requirements. For example, your application could include either or both of the following:

- Excerpts from the standard operating procedures (SOPs) of the printing company. The excerpts could include some of the QA/QC procedures to be used in the printing operations (*e.g.*, pre-press, press, and bindery) to ensure the requirements are met (*e.g.*, procedures to confirm correct paper type/weight is used; procedures to verify forms include the correct numbering series).
- Checklists and other job tools to be used (*e.g.*, during pre-press, press, and bindery) to ensure the requirements are met.

In addition, we recommend that you respond to the following three requests if they are not otherwise addressed in your discussion described above. The requests are discussed in greater detail in the *Instructions*:

- Indicate how you will coordinate the assignment of MTNs with actions taken by pressworkers in printing an order, so that the pressworkers do not inadvertently duplicate MTNs being assigned to other orders.
- Identify your method for pre-printing a unique MTN on each form (*i.e.*, crash or press numbering). If you propose to use press numbering, your application must describe quality control measures to ensure proper collation of manifest copies so that all required print specifications are achieved consistently.
- Indicate briefly how your organization will confirm that the MTNs printed on forms are unique.

7. Can my organization request two or more suffixes in our initial application?

For several reasons, registrants may not request more than one suffix in their initial application. We understand that some registrants intend to sell the manifest and may want to print suffixes desired by their customers (*e.g.*, a customer's abbreviated company name). We want to emphasize, however, that this is not the purpose of the suffix. The primary purpose of the unique suffix is to enable each registrant to print manifest tracking numbers (MTNs) that are unique to its organization. Another purpose is for EPA to identify the source of a manifest.

In addition, registrants may not request multiple suffixes because this would reduce the availability of suffixes for other registrants.

Finally, we believe that one suffix will provide a registrant with numbering capacity for many years. Section 262.21(f)(2) requires each registrant to print a unique MTN that consists of its unique suffix following nine digits. This 12-character numbering scheme will enable a registrant to print up to a billion unique numbers.

8. How can I satisfy the requirement for a signed certification in my initial application under section 262.21(b)(8)?

Section 262.21(b)(8) requires the application to include a signed certification by a duly authorized employee of the registrant that the organizations and companies in its application will comply with the procedures of its approved application and the requirements of section 262.21 and that it will notify the EPA Director of the Office of Solid Waste of any duplicated manifest tracking numbers on manifests that have been used or distributed to other parties as soon as this becomes known.

A good way to satisfy this requirement is to include the language of section 262.21(b)(8) in your application and sign it. For example:

I, [name of signatory], certify that [name of registrant organization and any other companies] will comply with the procedures of our approved application and the requirements of 40 CFR 262.21 and that we will notify the EPA Director of the Office of Solid Waste of any duplicated manifest tracking numbers on manifests that have been used or distributed to other parties as soon as this becomes known.

[signature and date]
[title of signatory]

For additional information on who the signatory should be, refer to the "Instructions for Preparing Application Materials for Submittal to EPA's Manifest Registry," which is posted at EPA's Manifest Registry web site.

9. Now that EPA has approved my organization to print the manifest under section 262.21(e), what requirements apply to us and what is the role of the signatory and contact person in ensuring compliance?

EPA expects that each approved organization will determine how best to ensure compliance with its approved application and the requirements of section 262.21. The signatory of your application has certified that the organizations and companies in your application will comply with the applicable requirements. In some organizations, we expect that the signatory will have direct responsibility for overseeing operations and ensuring compliance. In other organizations, the signatory might delegate this responsibility to the contact person or another person closer to the printing operations. In all cases, however, we recommend that each organization have a person who is close enough to the printing operation to ensure that applicable requirements are being met on a consistent basis. **This person will need to be cognizant of all of the information in its approved application, as well as the design of its approved manifest and continuation sheet, so that printing operations can be overseen effectively.** The person also should be familiar with the requirements of section 262.21.

Following are some of the key requirements of section 262.21 that you, as an approved registrant, should be familiar with:

- You must print the manifest and continuation sheet in accordance with your approved application, the print requirements of section 262.21(f), and the paper type (*i.e.*, manufacturer and grade), paper weight, ink color of the instructions, and binding method of your approved forms (262.21(e)).
- If you would like to update your application as it was approved under section 262.21(c) (*e.g.*, to change a phone number, contact person, etc.), you must revise the application and submit it to EPA (continue to use the contact information on the Manifest Registry web page), along with an indication or explanation of the change, as soon as practicable after the change occurs (262.21(h)(1)).
- You must notify EPA if you would like to change your manifest tracking number suffix (262.21(h)(2)). Once EPA has approved your proposed MTN suffix, you may begin using your new suffix immediately.
- If you would like to change the paper type (*i.e.*, manufacturer and grade), paper weight, ink color of the instructions, or binding method of your manifest or continuation sheet, you must submit samples of the revised forms to EPA for approval before using or distributing them (262.21(h)(3)).
- If you would like to use a new printing company to print the form on your behalf, you must submit form samples printed by the new printer, along with a description of the printer's qualifications, to EPA for approval before using or distributing the printer's forms (262.21(h)(3)).

- If, after receiving final approval, you now wish to typeset your form instead of continuing to use the electronic files of the forms that had been provided to you by EPA, you must submit samples of the typeset form to EPA for approval before using or distributing it (262.21(i)).
 - You must notify EPA by phone or e-mail as soon as you become aware that you have duplicated tracking numbers on any manifests that have been used or distributed to other parties (262.21(k)).
- 10. Once I am approved to print the manifest, are there any circumstances under which my printing privileges could be suspended or revoked?**

Yes. EPA may suspend and, if necessary, revoke your printing privileges if we find that you: 1) have used or distributed forms that deviate from your approved form samples with regard to paper weight, paper type (*i.e.*, manufacturer and grade), ink color of the instructions or binding method; or 2) exhibit a continuing pattern of behavior in using or distributing manifests that contain duplicate manifest tracking numbers. In such cases, we will send a warning letter to you that specifies the date by which you must come into compliance with the requirements. If you do not come into compliance by the specified date, we will send a second letter notifying you that we have suspended or revoked your printing privileges. We expect that suspension or revocation of printing privileges will be very rare.

- 11. I'm interested in buying manifests from a registered printer and would like to ask it to custom imprint my company's name and mailing address in the designated block (Item 5) of each form. Is it permissible for a registered printer to custom imprint information in the blocks of the manifest and continuation sheet?**

EPA understands that some customers will want information to be custom imprinted on their manifest and/or continuation sheet. EPA believes its procedures, described below, give registered printers sufficient flexibility to custom imprint information on the forms (please note: the manifest tracking number **must** be pre-printed in Item 4 of the manifest):

- Information **must not** be custom imprinted in any of the items of the manifest or continuation sheet that are listed in Tables 1 or 2, respectively, except that the words "On behalf of" may be pre-printed in Item 15. The tables reflect EPA's belief that these items need to remain blank until the user prepares the manifest for a particular waste shipment. We do not believe it is appropriate, for example, for a registered printer to custom imprint the number and type of containers in Item 10 of the manifest. This information could vary by shipment.
- Information **may** be custom imprinted in any other items of the forms, *e.g.*, at a customer's request.
- Following Tables 1 and 2 are the manifest and continuation sheet, color-coded to show these requirements.

Table 1. Items of the Manifest that Must Not Be Custom Imprinted by Registered Printer

Item No.	Item Name
2	Page 1 of __
10	Containers (No. and Type)
11	Total Quantity
12	Unit (Wt./Vol.)
15	Generator's/Offeror's Certification
17	Transporter Acknowledgment of Receipt of Materials
18a	Discrepancy Indication Space
18b	Alternate Facility (or Generator)
18c	Signature of Alternate Facility (or Generator)
19	Hazardous Waste Report Management Method Codes
20	Designated Facility Owner or Operator: Certification of Receipt

This document provides clarification from the U.S. EPA on the custom imprinting of information on the manifest by registered printers. It identifies blocks of the manifest in which information may be custom imprinted (e.g., at a customer's request).

Key

- Information must not be custom imprinted in the block.
- Information may be custom imprinted in the block.
- A unique manifest tracking number must be pre-printed in this block.
- "On behalf of" may be pre-printed in this block.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number			
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)						
Generator's Phone:								
6. Transporter 1 Company Name				U.S. EPA ID Number				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address				U.S. EPA ID Number				
Facility's Phone:								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
1.								
2.								
3.								
4.								
14. Special Handling Instructions and Additional Information								
<p>15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.</p>								
Generator's/Offeror's Printed/Typed Name				Signature		Month	Day	Year
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name				Signature		Month	Day	Year
Transporter 2 Printed/Typed Name				Signature		Month	Day	Year
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number: _____								
18b. Alternate Facility (or Generator)				U.S. EPA ID Number				
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)						Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.	2.	3.	4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name				Signature		Month	Day	Year

Table 2. Items of the Continuation Sheet that Must Not Be Custom Imprinted by Registered Printer

Item No.	Item Name
22	Page __
23	Manifest Tracking Number
28	Containers (No. and Type)
29	Total Quantity
30	Unit (Wt./Vol.)
33	Transporter Acknowledgment of Receipt of Materials
34	Transporter Acknowledgment of Receipt of Materials
35	Discrepancy
36	Hazardous Waste Report Management Method Codes

