

US EPA ARCHIVE DOCUMENT

**INSTRUCTIONS FOR PREPARING APPLICATION MATERIALS FOR SUBMITTAL
TO
EPA's MANIFEST REGISTRY**

U.S. Environmental Protection Agency
Office of Solid Waste

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I. Purpose and Organization of Document

This instructions document is intended to assist organizations - including states, waste management companies, industrial facilities and printing companies - in applying to the U.S. Environmental Protection Agency (EPA) under 40 CFR 262.21 to print the uniform hazardous waste manifest. (When using the term ‘organization’ in this document, it also refers to any entity that wants to apply to EPA to print the uniform hazardous waste manifest.) This document discusses the application requirements and EPA’s general recommendations on how to satisfy them. As a general matter, registrants will increase their likelihood of approval by considering the recommendations in this document. We encourage registrants to use their best judgment in proposing controls and procedures appropriate for their particular printing operations in order to satisfy the requirements.

The remainder of this document is organized as follows:

- Section II provides an overview of the registry process.
- Section III describes the requirements for the initial application under section 262.21(b) and EPA’s recommendations on what to include.
- Section IV provides recommendations for developing the form samples submitted under section 262.21(d).
- Section V discusses paper types and weights that may be used in designing the manifest. Registrants may increase their likelihood of approval by using them. However, registrants are free to use any paper type or weight, so long as they satisfy the requirements of section 262.21(f).
- Section VI describes the tests EPA intends to perform to evaluate form samples. The tests were developed to determine if a registrant’s form samples satisfy the section 262.21(f) requirements. We are setting forth the tests so registrants know how their samples will be evaluated and approved by EPA. All registrants are encouraged to perform these tests as needed when designing their samples to increase the likelihood of approval.
- Appendix A includes EPA’s “Checklist for Initial Application under EPA Manifest Registry.” EPA uses the checklist to evaluate initial applications against the requirements of section 262.21(b). A registrant may use the checklist to help make sure its initial application addresses all of the requirements.
- Appendix B includes EPA’s “Report Card for Registry Tests for Compliance with Requirements of 40 CFR 262.21(f).” EPA uses the Report Card when we perform our

tests to determine if the samples should be approved. A registrant may use the Report Card to help make sure its samples satisfy the requirements of section 262.21(f) before submittal.

Note: EPA may revise this document from time to time based on Registry needs and experience we gain while evaluating and approving application materials. For example, we may add new tests for form samples or augment the list of manufacturers and paper grades and weights found acceptable under the tests. Therefore, we encourage registrants to obtain the most recent document posted at the Registry web site (<http://www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/index.htm>) whenever they are preparing or updating application materials under the Registry.

II. Overview of the EPA Manifest Registry Process

EPA has established procedures at 40 CFR 262.21(a) through (e) to assist organizations in applying to the EPA Registry to print the hazardous waste manifest. As a registrant, you are required to submit two application components:

- initial application; and
- form samples and description.

The first component is the initial application, which is required by section 262.21(b). It must include general organizational information (*e.g.*, contact information) and describe your printing operations. It also must propose the unique three-letter suffix that you intend to use to pre-print a unique manifest tracking number (MTN) on each manifest. In addition, it must include your signed certification statement.

EPA intends to evaluate the two application components as follows. We will review your initial application under section 262.21(c) and either approve it or request additional information or modification before approving it. When it is approved, we will send you an electronic file of the manifest, continuation sheet, and form instructions. You then must submit three form samples and a description of them (*e.g.*, paper type, paper weight of each copy, and binding method of the samples). The samples must satisfy the print requirements of section 262.21(f) in all respects. While some of the requirements are prescriptive, others are performance-based and leave considerable discretion to you to design your form. For example, you must select an appropriate paper type, paper weight, ink color of the instructions, and binding method. If you would like to print the form using two or more different paper types, weights per copy, ink colors of the instructions, or binding methods, you may do so. However, you must submit a set of samples for each version of the form.

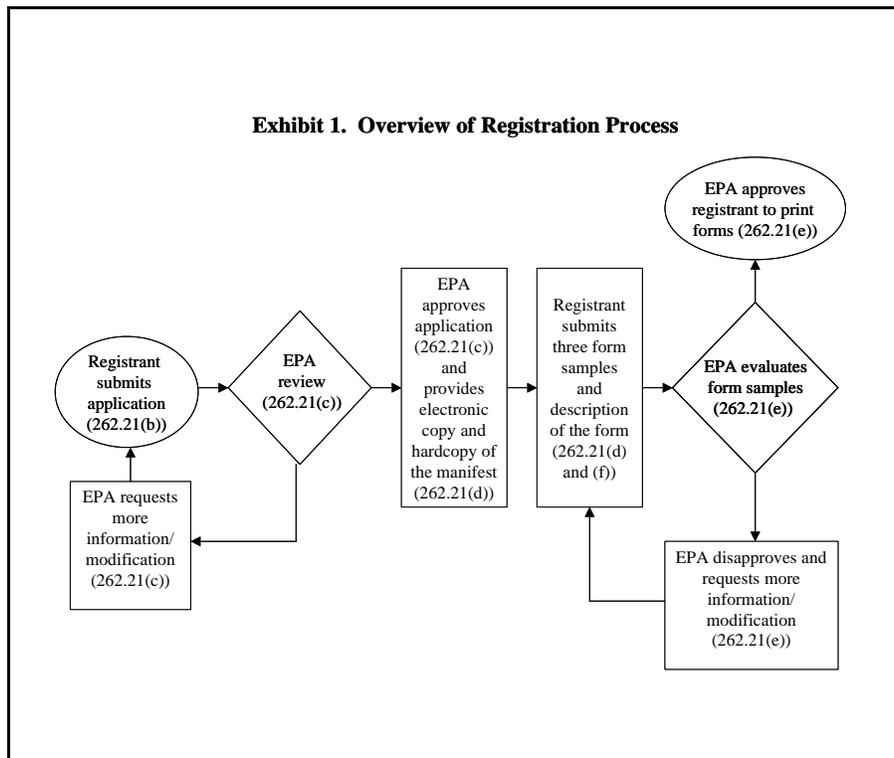
You do not need to submit samples of a continuation sheet if you will print the continuation sheet according to the paper type, paper weight of each copy, ink color of the instructions, and binding method of your approved manifest samples.

Once EPA receives your form samples and descriptions, we will perform a number of simple tests to determine if they satisfy the requirements of section 262.21(f). For example, we will write on them to determine if they satisfy the section 262.21(f)(5) requirement for handwritten impressions to be legible on all six copies. We expect that our review will typically take up to 45 days, except that we may extend this timeframe due to unforeseen circumstances. We expect that extensions will be infrequent. The 45 days will begin when EPA receives the form samples and descriptions.

If the samples pass all of our tests, we will approve you under section 262.21(e) to print the forms for use and distribution. If the samples fail, we will request modifications to them and resubmittal before approving their use.

After being approved under section 262.21(e), you must print the manifest and continuation sheet according to your application approved under section 262.21(c), the requirements of section 262.21(f), and the paper type, paper weight of each copy, ink color of the instructions, and binding method of your approved samples. You cannot change the paper type, paper weight, ink color, or binding method unless you receive EPA approval to do so. You also must comply with the other requirements of section 262.21, as applicable (e.g., requirements for updating your approved application as needed).

The steps in the application process are shown in the figure.



III. Preparing the Application under 40 CFR 262.21(b)

The purpose of the application required in section 262.21(b) is to demonstrate that adequate controls and procedures will be taken to ensure that your organization and any other organization under your registration, if any, will satisfy the requirements of section 262.21 consistently.

There is no “application form” to complete. Rather, you are free to use any format for your application as long as all required information is provided. The application must be clear enough for us to evaluate completeness and responsiveness to the requirements in section 262.21(b). If we have questions or concerns about your application, we will contact you to request clarifications or modifications, as necessary, before approving it.

If you have questions in preparing your application, you may contact Wanda LeBleu at the Registry by email at: lebleu.wanda@epa.gov or call and leave a voicemail at 703-308-0438. We will reply to your message at the earliest possible time.

You must submit your initial application and, subsequently, form samples to the EPA Director of the Office of Solid Waste at the following address:

Director, Office of Solid Waste
c/o Wanda LeBleu (5304W)
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

In order to expedite the handling of your application, you may wish to send it by over night mail or by courier. If so, please use the following address:

Director, Office of Solid Waste
c/o Wanda LeBleu
US Environmental Protection Agency
2800 Crystal Drive
9th Floor
Arlington, VA 22202

In addition, you must send a duplicate of your initial application and, subsequently, form samples to:

ICF Consulting
EPA's Manifest Registry
9300 Lee Highway
Fairfax, Virginia 22031

Following is a discussion of each required element of the initial application as well as some guidance on how to satisfy it. In addition, please note that we have attached a checklist in

Appendix A that we will use to evaluate and approve initial applications. Registrants may find it helpful to use the checklist in preparing their applications.

1. Section 262.21(b)(1) requires that the application provide the name and mailing address of the registrant.

We recommend that you provide the legal name of your organization and a mailing address that ensures correspondence reaches your contact person.

2. Section 262.21(b)(2) requires that the application provide the name, telephone number, and email address of a contact person.

We intend to send all Registry communications to the registrant's contact person. We recommend that the contact person be an individual who:

- will be available to respond promptly to EPA requests regarding your application, as well as your registration when approved;
- is familiar with the general circumstances of the registration (*e.g.*, organizations involved); and
- has access to the signatory of your application.

The contact person may be, for example, the signatory of the application, the signatory's administrative assistant, or a person closer to the printing operation.

3. Section 262.21(b)(3) requires that the application describe the registrant's government or business activity.

You can satisfy this requirement by stating your line of business (*e.g.*, a commercial forms printer, a waste treatment company) or by providing the North American Industry Classification System (NAICS) code of your primary line of business. Another way you can satisfy this requirement is to submit readily available literature (*e.g.*, corporate brochure) or direct us to a web page that describes your organization's activity.

4. Section 262.21(b)(4) requires that the application provide the registrant's EPA identification (ID) number if it has one.

An EPA ID number is a 12-character alphanumeric number assigned to an organization by EPA or its authorized state under the hazardous waste program. An organization is required under the regulations to obtain an EPA ID number if it generates, treats, stores, disposes of, transports, or offers for transportation, hazardous waste. You must submit your organization's EPA ID number if you have one.

We recommend that an organization that has multiple EPA ID numbers (*e.g.*, because it owns numerous sites) provide the number associated with the location where the signatory of its application or the contact person can be reached. We suggest that if your organization has not received an EPA ID number, that you state this fact in your application.

Organizations that do not have an EPA ID number (*i.e.*, organizations that are not involved in hazardous waste generation or management) **will not** be penalized for its absence of an EPA ID number.

5. **Section 262.21(b)(5) requires that the application provide a description of the scope of the operations that the registrant plans to undertake in printing, distributing, and using its manifests. The application must address the elements in section 262.21(b)(5)(i), (ii), and (iii), as follows.**
 - 5a. **Provide a description of the printing operation. The description should include an explanation of whether the registrant intends to print its manifests in-house (*i.e.*, using its own printing establishments) or through a separate (*i.e.*, unaffiliated) printing company. If the registrant intends to use a separate printing company to print the manifest on its behalf, the application must identify this printing company and discuss how the registrant will oversee it. If this includes the use of intermediaries (*e.g.*, prime and subcontractor relationships), the role of each must be discussed. The application must provide the name and mailing address of each company. It also must provide the name and telephone number of the contact person at each company. (262.21(b)(5)(i))**

We recognize that registrants likely will propose various ways to print the manifest. Some registrants might be commercial printers that intend to print the manifest themselves. Other registrants might be waste handler companies or forms brokers that do not have in-house printing capabilities. These companies might contract with an unaffiliated printing company to print their manifests. In addition, some printing companies might opt to outsource their print jobs to a subcontracted printing company.

Your application must identify all organizations that will have responsibilities under your registration, briefly describe the role of each, and provide the required contact information. Also, if you plan to use a separate company to print the manifest, you will need to describe how you will provide oversight and ensure that the other company is complying with the various requirements.

- 5b. **Provide a description of how the registrant will ensure that its organization and unaffiliated companies, if any, comply with the requirements of section 262.21. The application must discuss how the registrant will ensure that a unique manifest tracking number will be pre-printed on each manifest. The application must describe the internal control procedures to be followed by the registrant and unaffiliated companies to ensure that numbers are tightly controlled and remain**

unique. In particular, the application must describe how the registrant will assign manifest tracking numbers (MTNs) to its manifests. If computer systems or other infrastructure will be used to maintain, track, or assign numbers, these should be indicated. The application must also indicate how the printer will pre-print a unique MTN on each form (e.g., crash or press numbering). The application also must explain the other quality procedures to be followed by each establishment and printing company to ensure that all required print specifications are consistently achieved and that printing violations are identified and corrected at the earliest practicable time. (262.21(b)(5)(ii))

An approved registrant must print the manifest according to its application approved under section 262.21(c) and the manifest specifications in section 262.21(f)(1) through (7). For example, the form must have the exact format and appearance as EPA's forms and copy-to-copy registration must be within 1/32 of an inch.

In addition, section 262.21(f)(2) requires that a unique MTN assigned in accordance with a numbering system approved by EPA must be pre-printed in Item 4 of the manifest. The tracking number must consist of a unique three-letter suffix following nine digits. One of the Registry's highest priorities is ensuring that each manifest used or distributed to the public has a **unique** MTN.

Finally, the approved registrant must print the forms according to the paper type, paper weight of each copy, ink color of the manifest instructions, and binding method of its form samples approved under section 262.21(e).

Your application must describe the controls and procedures you intend to use to ensure that the requirements outlined above are satisfied. Following are recommendations on elements to include in your application.

Process for assigning Manifest Tracking Numbers. Section 262.21(a)(2) provides that the registrant is responsible for assigning manifest tracking numbers to its manifests. A registrant may delegate the responsibility of assigning MTNs to its contracted printer if it desires. Following are examples of two basic arrangements for assigning MTNs which will be discussed further in this document:

- Registrant assigns MTNs to its contracted printer; or
- Printer assigns MTNs to its pressworkers. Specifically, a printer could be responsible for assigning MTNs if: 1) it registers on its own to print the manifest using its own plants; or 2) it is a contracted printer that is delegated responsibility to assign MTNs by the registrant.

Registrants must ensure that a process is followed to ensure MTNs assigned to each print job are unique. Registrants should properly coordinate individuals in assigning numbers so they do not

duplicate each other's numbers inadvertently. If, for example, two employees in the registrant organization place print jobs with the contracted printer without proper coordination, one employee might not know of the MTNs being assigned by the other. This could lead to the inadvertent duplication of MTNs. Following are examples of processes that could be used to coordinate the assignment of MTNs:

- A registrant that assigns MTNs to its contracted printer could designate a single employee (or group of tightly coordinated employees) within its organization to be responsible for assigning MTNs to all print orders. For example, it could designate a single employee at its headquarters office to place all orders for the organization. In addition, a tracking tool (*e.g.*, a simple list of start and end numbers assigned, date of each print order, etc.) could be used to track and assign MTNs. If multiple employees assign MTNs, they could share the tracking tool to coordinate the MTNs assigned. It is preferable that this tracking tool be automated to the extent practicable (*e.g.*, a simple Excel spreadsheet) so that computations (*e.g.*, to determine the end number of each print order) can be done automatically instead of manually. The tracking tool would need to be updated when MTNs are assigned, as well as whenever updates are provided from the printer that need to be reflected.

If, on the other hand, a registrant wants to decentralize the assignment of MTNs by allowing employees to assign MTNs independently of each other, it must use an approach to ensure they do not duplicate each other's numbers inadvertently. For example, a registrant could allocate a large block of unique numbers to each of its field offices. Each field office could then draw from its respective block to assign MTNs to the printer on an on-going basis. Each field office should ensure that its respective employees use a coordinated approach to assigning MTNs, including, for example, the use of a tracking tool to track and assign MTNs as described above.

Under either approach, it is generally good practice for a registrant's employee(s) to interface with the same point of contact at the printing company each time a print order is placed, if possible. This will make it easier for the printer to develop familiarity with the registrant's jobs, track the MTNs assigned and printed across orders, and double-check the uniqueness of MTNs going forward.

- A printer that assigns MTNs could designate a single employee in its organization to assign MTNs to all print jobs. For example, a printer could designate an employee at a specific plant where all manifest print jobs will occur. This person could receive all print orders from sales staff, assign unique MTNs using a computer system, and forward the orders to pressworkers. As another example, a contracted printer could designate a single point of contact (*e.g.*, customer representative) to interface with all of the registrant's employees. This point of contact could assign unique MTNs to all of the registrant's print jobs.

Another approach could be to allow two or more employees to assign MTNs instead of a single person, so long as all employees use the same computer system enabling the coordinated assignment of unique MTNs across all print jobs in the organization. It is EPA's understanding that some printers could satisfy this description (*e.g.*, a printer that owns a single plant where all print orders will be received and entered into a single computer system for assignment of MTNs).

Your application must provide enough information for EPA to understand your process for assigning unique numbers. The examples above are acceptable processes identified by EPA. However, other processes also may be acceptable. In describing your process, your application needs to summarize the primary roles and responsibilities in the process. Your application need not provide the names of specific employees. The application also needs to indicate the computer systems, tracking tools or other infrastructure you intend to use in enough detail to demonstrate that practices are in place to minimize the likelihood for error in assigning and tracking unique MTNs.

Quality assurance and quality control (QA/QC) in printing the manifest. Your application must describe the 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 samples. We are not requesting a lengthy or detailed discussion, but a summary that demonstrates that your organization follows standard QA/QC systems and methods that will ensure the requirements are achieved consistently. It is not satisfactory to state simply that your operations are state-of-the-art and will produce high-quality forms. Rather, you need to provide enough information for EPA to understand what your primary QA/QC systems and methods are (*e.g.*, in regard to pre-press activities, press operation, bindery), as relevant to the requirements. If it is convenient to photocopy and attach selected pages from an existing document (*e.g.*, standard operating procedures) to supplement your summary, this is acceptable.

In addition, we recommend that you respond to the following specific requests if they are not otherwise addressed in the summary described above:

- Indicate briefly how you will coordinate the assignment of MTNs with actions taken by pressworkers in printing your orders. That is, during the printing process, pressworkers may need to make on-the-spot decisions on how to fulfill a print job. If they discover, for example, that some forms are damaged and must be discarded, they may consider exceeding the end number assigned to deliver the total number of forms ordered. Your method of assigning MTNs must be compatible with these actions.

For example, a registrant that assigns MTNs to the contracted printer could use an approach that minimizes the uncertainty associated with the pressworkers' actions. **An approach highly preferred by EPA is to require pressworkers not to exceed the end number assigned to each job.** This way, the registrant's end number assigned need not

remain in a state of uncertainty until the job is done, and its tracking tool will not need to be continually updated or revisions made to reflect revised end numbers. However, other approaches for coordinating with pressworkers also may be acceptable.

- Identify your method for pre-printing a unique MTN on each form (*i.e.*, crash or press numbering). The regulations do not prescribe either method. However, we believe that crash numbering will result generally in fewer numbering errors. **Because of this, we strongly encourage the use of crash numbering over 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. There are a variety of ways a registrant could comply with this requirement. For example, a registrant that contracts with a printer will receive a packing list indicating the MTNs printed in the shipment and could keep track of the MTNs to confirm that they are unique within and across print orders. A registrant that assigns MTNs to the contracted printer would need to update its tracking tool to reflect any relevant updates. In addition, the printing company could summarize briefly its QA/QC methods for confirming that printed forms have unique numbers.
- 5c. Provide an indication of whether the registrant intends to use the manifests for its own business operations or to distribute the manifests to a separate company or to the general public (*e.g.*, for purchase). (262.21(b)(5)(iii))**

If you intend to provide forms to the general public, your application generally should include contact information of your sales department (*e.g.*, phone numbers). When you are approved to print the form under section 262.21(e), we will post this information on our web site.

- 6. Section 262.21(b)(6) requires that the application provide a brief description of the qualifications of the company that will print the manifest. A registrant that intends to print the manifest in-house (*i.e.*, using its own establishments) must describe the qualifications of these establishments to print the manifest. Registrants that intend to use a separate printing company must describe the qualifications of this company.**

You may satisfy this requirement by, for example, providing readily available information, such as corporate brochures, product samples, customer references, and/or documentation of International Organization for Standardization (ISO) certification, provided this information pertains to the establishments or company proposed to print the manifest.

7. Section 262.21(b)(7) requires the application to propose a unique three-letter suffix that will be used in printing a unique MTN on each manifest.

As provided in section 262.21(f)(2), a unique MTN must be pre-printed in Item 4 of the manifest. The tracking number must consist of a unique three-letter suffix following nine digits.

Each registrant must propose a unique three-letter suffix in its application. Once approved to print the form, the registrant must use its suffix to pre-print a unique MTN on each form. In general, we expect that most approved registrants will affix their suffix directly to the printing plate. Each manifest then can be numbered sequentially as it passes through the printing process.

The Registry's web site

(<http://www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/index.htm>) presents a table identifying suffixes that have been assigned for other registrants. You may propose any three-letter suffix that has not been assigned already.

If you propose a suffix that has been assigned already, we will ask you to propose another one.

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 MTNs on manifests that have been used or distributed to other parties as soon as this becomes known.

A "duly authorized employee" is an individual employed by the registrant who has been delegated responsibility by the registrant to apply to the Registry. Once the application is approved, this individual ensures that the organization complies with the terms listed in the registration application. EPA expects the signatory to be someone of sufficient rank in the organization so that his or her signed certification attests to the knowledge and commitment of upper-level management to adhere to the notification requirement contained in the certification statement. The individual must have the requisite authority within the organization to ensure that the procedures and controls described in its application and the requirements of section 262.21 are followed.

IV. Developing Form Samples under 40 CFR 262.21(d) and (f)

This section provides guidance to registrants whose initial application has been approved under section 262.21(c). Registrants must submit three form samples and a description of them under section 262.21(d). The following suggestions will assist registrants in designing samples that will satisfy the requirements of section 262.21(f), and hence, receive Registry approval. The manifest and continuation sheet samples must satisfy the print requirements of section 262.21(f)(1) through (7) as follows.

- 1. The manifest and continuation sheet must be printed with the exact format and appearance as EPA Forms 8700-22 and 8700-22A, respectively. However, information required to complete the manifest may be pre-printed on the manifest form. (262.21(f)(1))**

Once your initial application is approved under section 262.21(c), the Registry will provide electronic files of the manifest, continuation sheet, and form instructions in Adobe Portable Document Format (PDF) files. We recommend that you use these files to develop your form samples. We discourage registrants from typesetting the form because creating the form from scratch could lead to mistakes.

In addition, when you are approved under section 262.21(e), you will need to use the electronic file of your approved samples to print the form for use and distribution. If, for example, you intend to print the manifest at several plants, you will need to provide the electronic file, along with the print requirements of section 262.21(f) and other directions (*e.g.*, paper types and weights to use), to each plant. Providing the electronic file to all plants will avoid the need for them to typeset it. Crafting a new typeset form after your approval would trigger requirements under section 262.21(i) for submittal of the typeset forms for approval.

We carefully designed the manifest and continuation sheet so that their line and block spacing is compatible with 12-pitch typewriters and impact printers. We will send you by mail a hard copy of the manifest and continuation sheet (*i.e.*, EPA master copy with a watermark). You must ensure that the forms you print have exact registration with the EPA master copy. For example, you need to make sure that you are printing at the actual size and are not shrinking or enlarging the size of the form. You also need to make sure your forms have exact registration to the EPA master copy by juxtaposing them to determine if all lines, words, and blocks line up exactly.

You must not deviate from the appearance or format of the EPA manifest in any way (*e.g.*, by adding company logos or adding/deleting blocks). This pertains both to the front and back (*i.e.*, instructions) of the form. Note, however, that:

- Information required to complete the manifest may be pre-printed on the manifest form (*e.g.*, a generator's name and mailing address may be pre-printed in Item 5 of the form).
- Product or company information (*e.g.*, stock number) must not be printed on the body of the form. However, this information may be printed on the common stubs of the form if desired.

- 2. A unique MTN assigned in accordance with a numbering system approved by EPA must be pre-printed in Item 4 of the manifest. The tracking number must consist of a unique three-letter suffix following nine digits. (262.21(f)(2))**

In your initial application, you were required to propose a unique, three-letter suffix to use in pre-printing a unique MTN on each form. This suffix must be approved by EPA before you can prepare your form samples. You must pre-print a unique MTN on each form sample using your approved suffix.

The MTN must consist of nine numeric digits typed consecutively, followed by a single space, and then the unique three-letter suffix in capital letters (*e.g.*, **000000001 AAA**). We suggest that the MTN be printed in bold, and in an easy to read typeface, such as Century Gothic and be 3/16 of an inch in height. The MTN must be in black typeface on each copy of the form.

- 3. The manifest and continuation sheet must be printed on 8 ½ x 11-inch white paper, excluding common stubs (*e.g.*, top- or side-bound stubs). The paper must be durable enough to withstand normal use. (262.21(f)(3))**

The regulations do not prescribe a paper type or paper weight for the manifest. You must select an appropriate paper type and weight to satisfy the requirement for paper durability. Section V of this document discusses paper types and weights regarding durability.

- 4. The manifest and continuation sheet must be printed in black ink that can be photocopied, scanned, and faxed legibly, except that the marginal words indicating copy distribution must be in red ink. (262.21(f)(4))**

The form must be printed in black ink, except that the marginal words must be printed in red (*e.g.*, using PMS 185¹).

- 5. The manifest and continuation sheet must be printed as six-copy forms. Copy-to-copy registration must be exact within 1/32nd of an inch. Handwritten and typed impressions on the form must be legible on all six copies. Copies must be bound together by one or more common stubs that reasonably ensure that they will not become detached inadvertently during normal use. (262.21(f)(5))**

The manifest and continuation sheet must each consist of six copies. The electronic files we provide to registrants include these six copies of the manifest and continuation sheet. We recommend that you use these files instead of typesetting the form.

The form must have copy-to-copy registration within 1/32nd of an inch. Acceptable copy-to-copy registration will ensure that impressions on the top copy will fall within the appropriate

¹ The Pantone[®] Matching System (PMS) is the industry standard color matching system.

blocks of the inner and bottom copies. By using the electronic files we provide, you will help to ensure acceptable copy-to-copy registration. You can confirm acceptable registration by several methods (*e.g.*, by juxtaposing the top, inner, and bottom copies to make sure that all lines, words, and blocks line up).

The regulations require that handwritten and typed impressions on the form must be conveyed legibly onto all six copies. Section V of this document discusses paper types and weights regarding legibility.

You are free to select the binding method of your form, so long as you comply with the requirements of section 262.21(f)(5). Some registrants may decide to use side stubs to bind copies of continuous forms. Others may decide to bind the copies at the top, which would result in individual forms (also called unit sets). Continuous forms work well with printers that can feed through continuous paper (such as impact printers). Unit sets are appropriate for typewriters and manual completion.

We discourage registrants from crimping their form's copies without gluing them. Failing to glue at least one stub is not likely to result in a securely bound form and will likely fail our tests.

Registrants must not edge-glue their copies (*i.e.*, binding without the use of common stubs). This would violate the requirement for common stubs.

Example of Binding Method for Continuous Forms

A number of commercial printers use the following binding method, which we have found acceptable under section 262.21(f)(5):

- Glue the copies together in the left stub of the form as follows:
 - Glue Copies 1 and 2 by placing a glue line on the left side of Copy 2's pin-feed holes. Copies 1 and 2 are then applied together.
 - Glue Copies 2 and 3 together by applying a glue line on the right side of Copy 3's pin-feed holes. Copies 2 and 3 are then applied together.
 - Follow this alternating pattern for all six copies. This minimizes the buildup/thickness of glue on the form. Heavy glue buildup could jam pin-hole feed printers.

and

- Crimp the form in its right and left stubs. The printers use 5 four-legged crimps in the left stub and 5 four-legged crimps in the right stub.

6. **Each copy of the manifest and continuation sheet must indicate how the copy must be distributed, as follows (262.21(f)(6)):**

Page 1 (top copy): "Designated facility to destination State (if required)"

Page 2: "Designated facility to generator State (if required)"

Page 3: "Designated facility to generator"

Page 4: "Designated facility's copy"

Page 5: "Transporter's copy"

Page 6 (bottom copy): "Generator's initial copy"

The electronic copies of the manifest and continuation sheet that we provide to you already have these words on them. The words must be printed in capital letters in red ink at the bottom of each copy, respectively.

[Note: The PDF files sent to you will include six copies of the manifest and six copies of the continuation sheet. The black layer on each copy of the manifest or continuation sheet is exactly the same copy to copy. Each copy differs only in regard to its words for copy distribution in red type at the bottom right margin.]

7. **The instructions in the Appendix to 40 CFR Part 262 must appear legibly on the back of the copies of the manifest and continuation sheet as provided in section 262.21(f)(7). The instructions must not be visible through the front of the copies when photocopied or faxed. (262.21(f)(7))**

Manifest Form 8700-22:

- The “Instructions for Generators” on Copy 6;**
- The “Instructions for International Shipment Block” and “Instructions for Transporters” on Copy 5; and**
- The “Instructions for Treatment, Storage and Disposal Facilities” on Copy 4.**

Manifest Form 8700-22A:

- The “Instructions for Generators” on Copy 6;**
- The “Instructions for Transporters” on Copy 5; and**
- The “Instructions for Treatment, Storage and Disposal Facilities” on Copy 4.**

This requirement is intended to ensure that the instructions are displayed consistently on the back of all forms. The requirement provides that the instructions cannot show through the front of the forms when photocopied or faxed. If the paper weight is too light and/or the ink color of the instructions is too dark, the instructions might bleed through the front of the copies. If the ink color is too light, it may not be legible sufficiently to waste handlers filling out the manifest. You need to determine the appropriate ink color and the extent of screening of the ink, if needed, to minimize bleed-through, but ensure legibility.

The table below gives examples of ink colors that may be appropriate for the manifest’s instructions. You are free to use these colors or any other color, so long as the requirements of section 262.21(f)(7) are satisfied.

**Examples of Ink Colors for the Instructions
(by PMS number) ^a**

PMS 157
PMS 313
PMS 423
Standard Black (50% to 60% screened)

^a Refer to a PMS chart for the colors associated with the PMS numbers in our examples, as well as for other colors.

V. Examples of Paper Types and Weights

Under 40 CFR 262.21(d)(2)(i), “paper type” refers to the manufacturer and grade of the paper. Paper manufacturers supply two general categories of paper for the manifest: carbonless and carbon interleaf. Either may be used for the manifest. In addition, manufacturers generally provide a range of paper grades. These grades may be more or less appropriate for a six-part form. For example, the highest quality papers are generally the brightest (whitest), and hence, handwritten and typed imprints are generally most legible on them. The highest quality carbonless papers normally contain the highest amount of coating, which results in a more effective transmission of imprint from copy to copy.

Papers can contain a range of recycled content. We encourage registrants to evaluate whether recycled paper would be appropriate for the manifest in light of the requirements of section 262.21(f), price, and other considerations.

Paper weight has several implications for the manifest. Lighter paper is generally thinner, and therefore, it is easier to make impressions copy to copy. However, if paper is too light, it is prone to tearing in normal use (*e.g.*, tearing in automatic-feed copiers or when detaching a copy from the manifest). Registrants must select a paper weight for each copy of the form that conveys handwritten and typed impressions onto all six copies, but also is durable enough to withstand normal use.

Based on our conversations with commercial printers and states, we generally recommend a 12- to 16-pound range for the form’s copies. Paper lighter than 12 pounds may not be durable enough to withstand normal use (*e.g.*, they may tear or jam in an automatic feed copier). Paper heavier than 16 pounds may be too heavy to convey impressions legibly on all six copies. Note, however, that the regulations do not prescribe a paper weight and leave this decision to the registrant.

The table below gives examples of paper types and weights that we have found acceptable under our Registry tests for legibility (Test 2) and durability (Test 10). (See Section VI of this document for these tests.) As the Agency evaluates other paper types and weights and finds them acceptable for legibility and durability, we will revise this list. **Disclaimer: EPA does not endorse any particular products. The paper types presented in this document are intended as reference points for paper types we are familiar with from previous tests. Other manufacturers’ papers that are equivalent to the specified paper types in their performance under the tests might also be acceptable. Registrants are encouraged to compare price and quality among vendors carefully before making their purchase.** You can increase your likelihood of approval by using them. However, you are free to use any paper type and weight, so long as the form meets applicable requirements. We suggest that you compare paper brands based on the regulations, price, quality, and other relevant considerations.

Examples of Paper Types and Weights^a

Paper Type ^b		Paper Weight (lbs)
Paper Manufacturer	Paper Grade	
Appleton	Superior (all copies)	16 CB, 14.5 CFB, 15 CF
Appleton	Superior, Specialities, Superior	16 CB, 12.5 CFB, 15 CF
Appleton	Premium, Premium, Superior	16 CB, 14.5 CFB, 15 CF
MeadWestvaco	Trans/rite, Trans/rite, Premium	16 CB, 14 CFB, 15 CF
MeadWestvaco	Trans/rite, Trans/rite, Premium	16 CB, 12.5 CFB, 15 CF
MeadWestvaco	Sequel Recycled (all copies)	16 CB, 14 CFB, 15 CF

^a EPA does not endorse any particular products. The paper types presented in the document are intended as reference points for paper types we are familiar with from previous tests. Other manufacturers' papers that are equivalent to the specified paper types in their performance under the tests might also be acceptable. Registrants are encouraged to compare price and quality among vendors carefully before making their purchase.

^b Carbonless papers are shown in the table. Carbon interleaf papers also are acceptable under the Registry so long as applicable requirements are met.

VI. Registry Tests for Compliance with the Printing Requirements of 40 CFR 262.21(f)

Following are the tests EPA intends to conduct in evaluating registrants' form samples under the Registry. These tests were designed to evaluate whether registrants' form samples satisfy the printing requirements of section 262.21(f). Although we acknowledge the limitations of evaluating a limited number of form samples (*e.g.*, there is normal variation in the quality of forms printed from batch to batch and the three samples may not reflect this fully), we believe they provide critical information. Form samples demonstrate the ability of the registrant to print the form to our satisfaction under the section 262.21(f) specifications. For many commercial printers, this will be straightforward. These are the tests that EPA intends to conduct. If registrants would like to suggest an alternative test to any of EPA's tests, EPA will consider whether the alternative test can demonstrate that the form samples meet the requirements of section 262.21(f).

It is possible that some registrants will submit form samples whose specifications are unfamiliar to us. For example, there are different ways to bind copies together, some of which may not be effective. In addition, some states have expressed concern that some manifest paper is too fragile and tears easily.

We recommend that registrants perform these tests when developing their samples. In addition, Appendix B includes EPA's "Report Card for Registry Tests for Compliance with Requirements of 40 CFR 262.21(f)." EPA will use the Report Card when we perform our tests to determine if

the samples should be approved. Registrants may find the Report Card helpful when testing their samples before submittal.

Registry Tests

Test 1: Evaluate copy-to-copy registration by tracing on top of the border of copy 1 of the samples using a firm point pen so the impression shows up clearly on copies 2 through 6. Examine copies 2 through 6 to identify deviations between the impression and the border of each copy. Deviations must not exceed 1/32 of an inch. This test evaluates compliance with section 262.21(f)(5), which requires copy-to-copy registration to be exact within 1/32nd of an inch.

Test 2: Write on the samples using a ballpoint pen (pressing firmly) to evaluate if the impressions on copies 2 through 6 are legible. This test evaluates compliance with section 262.21(f)(5) for legibility of handwritten impressions.

Test 3: Verify that the correct wording for copy distribution appears at the bottom right margin of each copy of the samples in capital letters. This test evaluates compliance with section 262.21(f)(6), which requires that each copy of the manifest form must indicate how the copy must be distributed.

Test 4: Progressively detach each copy of the samples from bottom to top. As each copy is detached, visually examine the samples to see if the remaining copies are still securely attached. This test evaluates compliance with section 262.21(f)(5), which requires that copies must be bound together by one or more common stubs that reasonably ensure that they will not become detached inadvertently during normal use.

Test 5: Verify that each copy of the samples consists of plain white paper that is 8.5 x 11 inches, excluding common stubs. This test evaluates compliance with section 262.21(f)(3) for proper paper size and color.

Test 6: Review each copy of the samples to verify that it is printed in black ink, except that the marginal words for copy distribution are in red ink. This test evaluates compliance with section 262.21(f)(4) for proper ink colors.

Test 7: Verify that the MTN appears in Item 4, consists of nine numerical digits followed by registrant's approved suffix, and is formatted correctly. The MTN must appear clearly on all six copies of the sample. In addition, verify that each sample has a different MTN. This test evaluates compliance with section 262.21(f)(2) for a unique MTN to be pre-printed on each form.

Test 8: Visually compare the front and back of each copy of the sample against EPA's master form to ensure that the sample has the exact format and appearance as EPA's form. In addition, juxtapose each copy of the sample with the corresponding copy of EPA's master form to ensure exact placement and dimensions of all lines, blocks and words on the sample's copies. This test

evaluates compliance with section 262.21(f)(1) for exact format and appearance as EPA's manifest and continuation sheet. It also evaluates compliance with section 262.21(f)(7) for the proper placement of the manifest instructions on the back of copies 4 through 6.

Test 9: Make a photocopy and fax of copies 4 through 6 of the samples and evaluate each photocopy and fax to verify that the instructions on the back are not visible on the front. This test evaluates compliance with section 262.21(f)(7), which provides that the instructions must not be visible through the front of the copies when photocopied or faxed.

Test 10: Place the samples in the automatic feed tray of the photocopier and make photocopies to see if the paper has a tendency to jam or tear. This test will be repeated several times to evaluate compliance with section 262.21(f)(3), which requires that the paper must be durable enough to withstand normal use. The states have expressed concern that some manifest papers tear or jam regularly in the copier when the automatic feed is used.

Appendix A: Checklist for Initial Application under EPA Manifest Registry

Checklist for Initial Application under EPA Manifest Registry

Instructions

This checklist is to be used to perform the evaluation of initial applications under 40 CFR 262.21(c). The application must satisfy all requirements of section 262.21(b). This checklist consists of two sections.

Section I includes a checklist for evaluating the application for completeness. Registrants must provide information to address sections 262.21(b)(1)-(8). You should perform a high-level review of the application and complete this section to indicate if each requirement is addressed in sufficient clarity and detail to enable an in-depth technical review. If a requirement is not addressed sufficiently, include a comment identifying the deficiency and questions/information needed to address it. In addition, space is provided at the end of this section for you to summarize your findings regarding completeness and to identify all deficiencies and questions/information needs for the applicant to address. Text should be written so that it can be cut/pasted directly into the concise written report with little or no modification. If the application is incomplete, the applicant should be contacted and information obtained before the in-depth technical review is begun.

Section II includes a checklist for an in-depth technical review of the application under the requirements of section 262.21(b)(5)-(8). A registrant must demonstrate that it will satisfy the requirements of section 262.21(b)(5) for the control of manifest tracking numbers and quality control in the printing of forms. The registrant also must satisfy the other requirements of section 262.21(b)(5)-(8).

Each requirement of section 262.21(b)(5)-(8) is described in Section II, followed by a checklist of criteria that the application should satisfy. For each criterion, you should examine the application and indicate in the checklist if the criterion is passed or failed. Include a comment for any criterion that is failed, describing the deficiency and questions/information needs. In addition, space is provided at the end of each subsection for you to summarize your findings, identify deficiencies and questions/information needs for the applicant to address, and indicate any issues for EPA's attention. Text should be written so that it can be cut/pasted directly into the concise written report with little or no modification.

Name of Applicant: _____

Evaluation Date: _____

Registry ID No.: _____

Name of Reviewer 1: _____

Revision No.: _____

Name of Reviewer 2: _____

Section I. Review for Completeness under 40 CFR 262.21(b)(1)-(8)					
	Requirements and Criteria	Is Sufficient Information Provided To Enable Technical Review?			Comments
		Yes	No	N/A	
1	Registrant name and mailing address are provided (262.21(b)(1)).				
2	Name, phone number and email address of contact person are provided (262.21(b)(2)).				
3	Brief description of registrant's government or business activity (e.g., NAICS code) is provided (262.21(b)(3)).				
4	EPA ID Number of registrant is provided, if one has been issued (262.21(b)(4)).				

Checklist for Initial Application under EPA Manifest Registry (continued)

	Requirements and Criteria	Is Sufficient Information Provided To Enable Technical Review?			Comments
		Yes	No	N/A	
5	Description of scope of operations is provided (262.21(b)(5)), as follows:				
6	Description of proposed printing operations (e.g. , whether it intends to print in-house or use an unaffiliated company), including the role of each organization and how the registrant will oversee them (262.21(b)(5)(i)).				
7	Name and mailing address of each unaffiliated organization in the application (262.21(b)(5)(i)).				
8	Name of contact person and phone number for each unaffiliated organization in the application (262.21(b)(5)(i)).				
9	Description of how registrant will ensure that it and unaffiliated organizations will comply with 262.21 requirements (262.21(b)(5)(ii)).				
10	Description of the internal control procedures of registrant and other organizations to ensure MTNs remain unique, including a process to assign unique MTNs (262.21(b)(5)(ii)).				
11	Description of how the printer will pre-print a unique MTN on each form (i.e., press or crash numbering) (262.21(b)(5)(ii)).				
12	Other quality procedures to be followed in printing forms (262.21(b)(5)(ii)).				
13	Indication of whether registrant will use the manifests for its own operations or for distribution and sale (262.21(b)(5)(iii)).				
14	Brief description of qualifications of company that will print the forms is provided (262.21(b)(6)).				
15	Proposed unique 3-letter MTN suffix is provided (262.21(b)(7)).				
16	Signed certification by registrant employee is provided (262.21(b)(8)).				
17	Summary:				

Checklist for Initial Application under EPA Manifest Registry (continued)

Section II. In-Depth Technical Review under 40 CFR 262.21(b)(5)-(8)				
Requirements and Criteria	Does Application Satisfy the Requirement/Criterion?			Comments
	Yes	No	N/A	
II.1 Description of the Scope of the Operations the Registrant will Use to Print, Distribute and Use the Manifest (40 CFR 262.21(b)(5))				
II.1.1 Description of the Printing Operation (262.21(b)(5)(i)). The application must describe the printing operation. The application should explain whether the registrant intends to print its manifests in-house (<i>i.e.</i> , using its own printing establishments) or through a separate (<i>i.e.</i> , unaffiliated) printing company. If the registrant intends to use a separate printing company to print the manifest on its behalf, the application must identify this printing company and discuss how the registrant will oversee the company. If this includes the use of intermediaries (<i>e.g.</i> , prime and subcontractor relationships), the role of each must be discussed.				
18	The application indicates if the registrant's own establishments or an unaffiliated company will print the forms.			
19	The application describes the overall printing operation in enough detail to understand the role of each organization, including how the registrant will oversee the unaffiliated companies, if any.			
20	Summary:			

Checklist for Initial Application under EPA Manifest Registry (continued)

Requirements and Criteria		Does Application Satisfy the Requirement/Criterion?			Comments
		Yes	No	N/A	
<p>II.1.2 Description of Procedures to Comply with Section 262.21 (262.21(b)(5)(ii)). The application must describe how the registrant will ensure that its organization and unaffiliated companies, if any, will comply with the requirements of section 262.21. The application must discuss how the registrant will ensure that a unique manifest tracking number will be pre-printed on each manifest. The application must describe the internal control procedures to be followed by the registrant and unaffiliated companies to ensure that numbers are tightly controlled and remain unique. In particular, the application must describe how the registrant will assign manifest tracking numbers to its manifests. If computer systems or other infrastructure will be used to maintain, track, or assign numbers, these should be indicated. The application must also indicate how the printer will pre-print a unique number on each form (e.g., crash or press numbering). The application must also explain the 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.</p>					
II.1.2.1 Overall Process for Ensuring Compliance under 262.21					
21	The registrant and unaffiliated companies will use best industry practices for ensuring high-quality manifest print jobs, including the following where needed:				
22	Regular monitoring of printing process and form quality by registrant.				
23	Clear lines of communication and accountability among organizations and individuals in the printing operations.				
24	Use of standard industry tools, including packing lists that document MTNs used in the print job; and a database, spreadsheet, or other tool to track manifest tracking				
II.1.2.2 Process to Assign MTNs for Print Job					
II.1.2.2.1 Registrant assigns MTNs					
25	The registrant will assign MTNs using one of the following approaches:				
26	One employee in the registrant organization will be responsible for assigning MTNs to each print job using a simple tracking tool.				
27	A group of tightly coordinated employees in the registrant organization will assign MTNs using a shared tracking tool to track and assign MTNs to all print jobs.				
28	Employees of the registrant organization will assign MTNs independently of each other (e.g., at separate facilities) and the registrant has established a system to prevent duplication among them. For example, the registrant has allocated a block of unique numbers to each employee for its respective use, and each will use a tracking tool to track and assign MTNs. If employees draw from the same block of numbers, they will share the tracking tool.				
29	If none of the above processes are used, the registrant proposes an approach that will control against assigning duplicate MTNs. (Briefly describe the process in the "Comments.")				
30	The tracking tool is automated to the extent practicable.				
31	The tracking tool will be updated immediately when MTNs are assigned to a print job and when other updates become known.				
32	The registrant's approach includes a process to double-check an employee's assignment of MTNs to ensure they are unique if possible, e.g., a double-check by contracted printer.				

Checklist for Initial Application under EPA Manifest Registry (continued)

Requirements and Criteria		Does Application Satisfy the Requirement/Criterion?			Comments
		Yes	No	N/A	
II.1.2.2.2 Printer assigns MTNs					
33	The printer will assign MTNs using one of the following approaches:				
34	The printer has designated a single person to assign MTNs to all print jobs in its organization, including the use of a computer to assign unique MTNs.				
35	The printer will coordinate the assignment of MTNs by allowing multiple employees to assign MTNs, provided they coordinate the assignment of MTNs, including use of a shared computer system to assign MTNs across all print jobs in its organization. In this case, the printer demonstrates that its company is operated such that the assignment of unique MTNs can be accomplished consistently (e.g., through the use of a computer system that is shared by all employees at a single location).				
36	If none of the above processes are used, the printer proposes an approach that will control against assigning duplicate MTNs. (Briefly describe the process in the "Comments.")				

Checklist for Initial Application under EPA Manifest Registry (continued)

Requirements and Criteria		Does Application Satisfy the Requirement/Criterion?			Comments
		Yes	No	N/A	
II.1.2.3 Quality Assurance and Quality Control (QA/QC) in the Printing Operation					
37	The registrant and any other organization in its application will use standard industry QA/QC systems and methods to ensure compliance with 262.21 print requirements and specifications, including QA/QC during:				
38	Pre-press activities (e.g., systems and methods for proper selection of paper type and weights).				
39	Press operations (e.g., systems and methods for continuous monitoring).				
40	Bindery.				
41	Other.				
42	The registrant will use reasonable controls to coordinate the assignment of MTNs with pressworker activities (e.g., by issuing an order with each print job not to exceed the end number assigned).				
43	If press numbering will be used, the printer will follow controls to minimize, detect and correct the miscollation of forms that could lead to duplicated MTNs. (The reviewer should briefly describe the additional controls to prevent miscollation during press numbering in the comments section).				
44	The registrant will use QA/QC controls to confirm that each printed manifest includes a unique MTN, such as the following:				
45	A registrant that contracts with a printer receives and tracks MTNs on packing list to ensure MTNs within and across print jobs are unique.				
46	A registrant that assigns MTNs to the contracted printer receives packing lists and promptly updates its tracking tool as needed (e.g., to reflect revised end number).				
47	The company printing the manifest describes its QA/QC systems and methods for confirming that printed forms have unique MTNs.				
48	Summary:				

Checklist for Initial Application under EPA Manifest Registry (continued)

Requirements and Criteria	Does Application Satisfy the Requirement/Criterion?			Comments
	Yes	No	N/A	
II.1.3 Use and Distribution of the Form (262.21(b)(5)(iii)). The application must include an indication of whether the registrant intends to use the manifests for its own business operations or to distribute them to a separate company or to the general public (e.g., for purchase).				
49	Summary:			

Checklist for Initial Application under EPA Manifest Registry (continued)

	Requirements and Criteria	Does Application Satisfy the Requirement/Criterion?			Comments
		Yes	No	N/A	
II.3 Proposed Suffix (262.21(b)(7)). The application must include a proposed unique three-letter manifest tracking number suffix.					
54	The three-letter suffix is unique. It has not been proposed by or approved for any other registrant.				
55	The suffix is not offensive.				
56	Summary:				
II.4 Signed Certification (262.21(b)(8)). The application must 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 other parties as soon as this becomes known.					
57	An employee of the registrant has signed the certification.				
58	The certification statement is complete and consistent with regard to the statement in section 262.21(b)(8).				
59	Summary:				

**Appendix B: Report Card for Registry Tests for Compliance with
Requirements of 40 CFR 262.21(f)**

Report Card for Registry Tests for Compliance with Requirements of 40 CFR 262.21(f)

Instructions

This Report Card is to be used in conjunction with the "Registry Tests of Manifest Form Samples." In the Report Card, you will record the results of the tests. In completing the Report Card, please indicate if the registrant's samples of the manifest form and continuation sheet passed or failed each criterion under each test. If the sample failed, you must complete the "Explanation of Failure" by identifying in specific terms what the failure was so that the registrant can easily find and correct it. This means, for example, identifying the specific error on it (e.g., the specific word that was misspelled), or otherwise why it failed (e.g., "Copy 2, 3, and 5 tore in the copier under Test 10"). You also must include any other issues, questions, or concerns that the QA Monitor or EPA should be aware of, if any (e.g., indicate if you had problems performing the test, or were uncertain whether the sample passed or failed a particular criterion). In addition, the final Report Card sent to EPA must describe the form samples in the spaces provided (e.g., paper type and weights).

Name of Applicant:			Evaluation Date:		
Registry ID No.:			Name of Reviewer 1:		
No. Sets Submitted:		of		Name of Reviewer 2:	
Revision No.:				Name of Reviewer 3:	
Manifest Tracking Number:					

Test Description	Pass/Fail		Explanation of Failure
	Pass	Fail	
Manifest Form Evaluation			
Test 1: Copy-to-copy registration			
40 CFR 262.21(f)(5): The manifest form must be printed as six-copy forms. Copy-to-copy registration must be exact within 1/32nd of an inch.			
The manifest form contains 6 copies.			
inch.			
Test 2: Legibility of impressions on six copies			
40 CFR 262.21(f)(5): Handwritten and typed impressions on the form must be legible on all six copies.			
Lines 1 and/or 2 on Copy 2 are legible.			
Lines 1 and/or 2 on Copy 3 are legible.			
Lines 1 and/or 2 on Copy 4 are legible.			
Lines 1 and/or 2 on Copy 5 are legible.			
Lines 1 and/or 2 on Copy 6 are legible.			
Test 3: Words regarding copy distribution			
40 CFR 262.21(f)(6): Each copy of the manifest form must indicate how the copy must be distributed, as reflected below.			
Copy 1 includes the words "DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)".			
Copy 2 includes the words "DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)".			
Copy 3 includes the words "DESIGNATED FACILITY TO GENERATOR".			
Copy 4 includes the words "DESIGNATED FACILITY'S COPY".			
Copy 5 includes the words "TRANSPORTER'S COPY".			
Copy 6 includes the words "GENERATOR'S INITIAL COPY".			

Report Card for Registry Tests for Compliance with Requirements of 40 CFR 262.21(f) (continued)

Test Description	Pass/Fail		Explanation of Failure
	Pass	Fail	
Manifest Form Evaluation			
Test 4: Binding Method			
40 CFR 262.21(f)(5): Copies must be bound together by one or more common stubs that reasonably ensure that they will not become detached inadvertently during normal use.			
Test 4.1: Visual Examination of Binding Method			
All copies are bound together using common stub(s).			
Test 4.2: Performance Test for Binding			
When detaching Copy 6, Copies 1 through 5 stay securely bound together.			
When detaching Copy 5, Copies 1 through 4 stay securely bound together.			
When detaching Copy 4, Copies 1 through 3 stay securely bound together.			
When detaching Copy 3, Copies 1 and 2 stay securely bound together.			
Test 5: Paper size and color			
40 CFR 262.21(f)(3): The manifest form must be printed on 8.5 x 11-inch white paper, excluding common stubs (e.g., top- or side-bound stubs).			
The manifest form is printed on white paper.			
The manifest form is printed on 8.5 x 11-inch paper, excluding common stubs (e.g., top- or side-bound stubs).			
Test 6: Ink colors			
40 CFR 262.21(f)(4): The manifest form must be printed in black ink, except that the marginal words indicating copy distribution must be in red ink.			
Marginal words indicating copy distribution are printed in red ink.			
Remaining words and lines are printed in black ink.			
Test 7: Unique 12-character Manifest Tracking Number			
40 CFR 262.21(f)(2): A unique Manifest Tracking Number assigned in accordance with a numbering system approved by EPA must be pre-printed in Item 4 of the manifest form. The tracking number must consist of a unique three-letter suffix following nine digits.			
The Manifest Tracking Number appears in black in Item 4.			
The Manifest Tracking Number consists of nine numerical digits followed by the approved three-letter suffix.			
The Manifest Tracking Number is printed in the correct format: nine numerical digits printed consecutively, followed by a single space, and then the approved suffix in capital letters.			
The Manifest Tracking Number is in bold Century Gothic typeface or equivalent and is 3/16 inch in height.			
The same Manifest Tracking Number appears clearly in black on each copy of the manifest form.			
A unique Manifest Tracking Number is included on each of the 3 manifest form samples.			

Report Card for Registry Tests for Compliance with Requirements of 40 CFR 262.21(f) (continued)

Test Description	Pass/Fail		Explanation of Failure
	Pass	Fail	
Manifest Form Evaluation			
Test 8: Exact format and appearance with the EPA's master copies			
40 CFR 262.21(f)(1): The manifest form must be printed with the exact format and appearance as EPA Form 8700-22. That is, the front and the back of the form must be identical to EPA's master copy in all aspects. However, information required to complete the manifest form may be preprinted on it.			
Test 8.1: Visual Comparisons of Front of Sample vs. Master Copy (line-by line comparison)			
There is no company information (e.g., company name, logo), except for information required to complete the manifest form (e.g., in Items 1 through 20).			
Sample is identical to master copy in regard to all blocks (e.g., no additions or deletions).			
Sample is identical to master copy in regard to all words (e.g., no words added, deleted, or modified).			
Sample is identical to master copy in regard to all lines (e.g., no additions or deletions).			
There are no hash marks.			
There is no shading.			
There are no typos.			
The sample is identical to the master copy in all other respects.			
Test 8.2: Visual Comparisons of Front of Sample vs. Master Copy (comparison using light source)			
All lines, blocks, and words are in the exact location as EPA's master copy (i.e., registration with EPA's master copy within 1/32nd of an inch).			
The sample is identical to the master copy in all other respects.			
Test 8.3: Visual Comparison of Back of Sample vs. Master Copy			
Back of Copy 6 of sample is identical to the master copy of instructions for Copy 6.			
Back of Copy 5 of sample is identical to master copy of instructions for Copy 5.			
Back of Copy 4 of sample is identical to master copy of instructions for Copy 4.			
Back of Copies 1 through 3 are completely blank.			
Test 9: Legibility of instructions and no bleed-through			
40 CFR 262.21(f)(7): The instructions in the Appendix to 40 CFR Part 262 must appear legibly on the back of the copies of the manifest form as provided in section 262.21(f). The instructions must not be visible through the front of the copies when photocopied or faxed.			
Test 9.1: Visual Examination of Instructions for Legibility			
The instructions appear legibly on the back of the copies of the manifest form.			
Test 9.2: Test for Bleed-through of Instructions using Photocopier			
The instructions are not be visible through the front of the copies when photocopied.			
Test 9.3: Test for Bleed-through of Instructions using Fax Machine			
The instructions are not be visible through the front of the copies when faxed.			
Test 10: Paper durability			
40 CFR 262.21(f)(3): The paper must be durable enough to withstand normal use.			
The paper did not jam or tear more than twice when photocopied in an automatic feed copier.			