

9452.1987(02)

APR 30 1987

Gregory Zak  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Dear Mr. Zak:

Thank you for your letter of February 10, 1987, in which you request concurrence from EPA on Illinois' decision not to allow use of the continuation sheet (form 8700-22A) to the Uniforms Hazardous Waste Manifest.

The instructions to the manifest (Appendix to 40 CFR Part 262) state that the continuation sheet must be used if more than two transporters are used in transporting the waste or if no space is required for the DOT description and related information. However, from my conversations with various States, I am aware that the use of more than two transporters is rare. Further, since implementation of the Uniform Hazardous Waste Manifest form in September 1984, the DOT has simplified procedures for shipping "lab packs" (50 FR 11700, March 25, 1985, enclosed) which in some instances eliminates the need to list each sample on the manifest. As a result, a continuation sheet is often unnecessary.

EPA views Illinois' decision not to allow the use of the continuation sheet but rather to require an additional manifest for any shipment which consists of more than two transporters or more than four DOT proper shipping names as being consistent with the Federal program. Please call me on 202-382-2217 if you have any further questions on this matter.

Sincerely,

Carolyn Barley

Enclosure

RO 11242