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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

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4. DOT Manifest Requirements

When filling out a hazardous waste manifest, must the generator include the EPA hazardous waste identification number and hazardous substance reportable quantity under the Department of Transportation (DOT) shipping description?

In the November 21, 1986 Federal Register (51 FR 42175), DOT's Research and Special Programs Administration (RSPA) issued final hazardous materials regulations which incorporated CERCLA hazardous substances as DOT hazardous materials. In a later Federal Register dated February 17, 1987 (52 FR 4824), the RSPA published corrections to the November 21, 1986 regulations. Together, these regulations amended 49 CFR Parts 171 and 172 by placing additional information requirements on shippers of hazardous waste (i.e., generators). Section 172.02 of the new DOT regulations requires the shipper (hazardous waste generator) to identify EPA waste streams by the EPA identification number and for wastes which exhibit an EPA characteristic of ignitability, corrosivity, reactivity or EP toxicity, by the letters "EPA" and the word "ignitability" or "corrosivity" or "reactivity" or "EP toxicity", as appropriate. Section 172.203 and Section 172.324 of these regulations require the notation "RQ" on the shipping papers in association with the proper shipping description when a package (i.e., container) contains a reportable quantity or more of hazardous waste. However, the new DOT regulations do not require the "numerical reportable quantity" to be on the manifest (see November 21, 1986 Federal Register (51 FR 42175)).

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