

JUNE 26 1984

Mr. Kurt Hilsenbeck
Planning and Management Section
Waste Management Program
Missouri Department of Natural
Resources
P.O. Box 1368
1915 Southridge Drive
Jefferson City, Missouri 65102

Dear Mr. Hilsenbeck:

Thank you for providing us with the opportunity to review Missouri's "rough draft" of the Uniform Hazardous Waste Manifest (UHWB).

You specifically ask if "... re-lettering of items within the shaded area is permissible." Re-lettering information items is not permitted under 271.10 (h) of the UHWB regulations. If a State decides not to require completion of all the items within the shaded area, we recommend instructing Manifest users to leave that particular item blank.

Our comments on other modifications which Missouri's has made to the UHWB form are as follows:

Items 1 and A through I - Additional descriptions may not be added to these headings nor may the items be re-lettered. (See March 20, 1984 FR, page 10499, Modifications to the Form.)

Information on the emergency response number for the U.S. Coast Guard (below item J)-This additional information may only be placed in the margin or on the back of the form (271.10) (h) (iv).

Faxback 11037

While the draft copy which I have received for review does not show the bottom portion, it is important to note that the words, EPA Form 8700-22 (3-84) must be included on the Form.

If you have any questions regarding these comments, please do not hesitate to call me (FTS-382-5235) or John Thompson (FTS-382-4697).

Sincerely yours,

Carolyn K. Barley
Environmental Protection Specialist
Implementation Branch
Office of Solid Waste (WH-563)

Enclosure

cc: Todd Gulick, OGC
Chet McLaughlin, EPA Region VII