

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE COMMUNICATION

OPERATIONAL MEMO 121-3

March 11, 2002

TO: All Waste Management Division Supervisors
FROM: Jim Sygo, Chief, Waste Management Division
SUBJECT: Revised Part 121 Consolidated Manifest Management Procedures

Historical Perspective

Part 121, Liquid Industrial Wastes, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), requires that a manifest accompany waste transported pursuant to that part. Part 121, Section 12103(1)(d) authorizes the Department of Environmental Quality (DEQ), Waste Management Division, to approve the use of a consolidated manifest for waste shipments that are an aggregate of uniform waste types picked up from multiple generators that constitute a single shipment of waste commingled on a single vehicle. These approvals had been given for specific wastes identified with a unique name and number assigned. These approvals were granted to eliminate the need to assign United States Environmental Protection Agency (U.S. EPA)/state generator identification numbers to a variety of small generators, promote efficiencies such as reducing paperwork, and encourage the proper management of these wastes.

With recent manifest reporting requirements and electronic waste reporting being implemented by designated facilities, the DEQ has now determined that the wastes on consolidated manifests must be identified with each specific generator who contributes to the waste shipment described on the manifest.

Historically, the transporter prepared the consolidated manifest. The transporter would enter the approved number and name of the consolidated waste in the generator section of the manifest. The information regarding the actual generator(s) of the waste(s) on the consolidated manifest was recorded on the trip log, which the transporter is required to maintain under Section 12109(4). The DEQ continues to support use of the consolidated manifest tool. However, it is now necessary to more clearly identify a responsible party for the waste load described by the consolidated manifest. The DEQ recognizes that the transporter is not the actual generator of the waste(s) contained with the waste load, but simply facilitates this type of management by preparing a consolidated manifest for the benefit of the generators contributing waste to the consolidated shipment. The person who actually generates each waste contained in the load is considered the responsible party for that waste.

Effective immediately, all generic generator consolidated numbers and procedures previously approved for Part 121 consolidated manifests are rescinded by the DEQ. Continued use of these numbers and procedures is no longer authorized by the DEQ.

Part 121 Consolidated Manifest Procedure

By this memorandum, the DEQ adopts the following management procedures for consolidated wastes. These procedures are effective immediately and require no special approval of individual transporters or eligible generators by the DEQ. Approval by the DEQ to use a consolidated manifest, as authorized in Part 121, Section 12103 (1)(d), is contingent on transporter compliance with the following:

1. Manifested wastes must be Part 121 liquid industrial waste and exempt from the manifest requirements of Part 111, Hazardous Waste Management, of the NREPA. Note that liquid hazardous waste generated by a conditionally-exempt small quantity generator (CESQG) is not required to be manifested under Part 111. As such, it is considered a Part 121 waste and may be shipped using a consolidated manifest.
2. Wastes must be of the same type, compatible with one another, destined to the same designated facility, and transported commingled on a single vehicle.
3. The manifest must be prepared as follows:
 - a. The transporter must be listed as the generator of record. The transporter's assigned U.S. EPA/state generator identification number, mailing address, and phone number must be indicated on the manifest.
 - b. The Part 121 waste code required in Item I of the manifest must have a "C" (for consolidated) added at the end of the Part 121 waste code (Example – 007L would be 007LC).
 - c. Liquid hazardous wastes regulated under Part 121 (e.g., generated by a CESQG) must be represented on the consolidated manifest by the Part 111 waste code. A "C" (for consolidated) must be added at the end of the Part 111 waste code (Example – D001 would be D001C).
 - d. If multiple codes are necessary to be identified on the manifest for a single waste stream, the appropriate Part 111 hazardous waste code must be listed first, and any additional codes must be listed in Item 15 on the manifest. All the codes listed shall have the "C" added at the end of the waste code.
 - e. Item 11 must adequately describe the waste being consolidated (Example – 029L "Other Waste" – Specifically describe the waste that is being consolidated, such as "meat processing wash water" or "gasoline spill cleanup wastewater").
 - f. A trip log, as required under Section 12109(4), is required to document the individual pickups. Required information includes: the consolidated manifest number, the name of the party actually generating the waste, date of pickup, type and quantity of waste, and the designated facility.
 - g. As required by Section 12109(3), the transporter must provide a receipt for each individual pickup to the actual generator of the waste. The receipt must include

the transporter's company name, driver's signature, date of pickup, type and quantity of waste removed, consolidated manifest number, and the designated facility.

4. The following **revised waste codes** must be used for Part 121 wastes:

		<u>Consolidated Waste Code</u>
Mixed Solvents (Solvent Solutions)	007L	007LC
Pharmaceutical	014L	014LC
Automotive Oil	017L	017LC
Coolants and Water Soluble Oils	019L	019LC
Other Oil (Describe in Item 11 or Item J)	021L	021LC
Brine	022L	022LC
Polychlorinated Biphenyls	026L	026LC
Other Waste (Describe in Item 11 or Item J)	029L	029LC
Antifreeze	030L	030LC
Storm Sewer Cleanouts	031L	031LC
Sanitary Sewer Cleanouts	032L	032LC
X-Ray/Photo Solutions	033L	033LC
Water Based Cleaning Solutions	034L	034LC
Car Wash Sludges	035L	035LC
Grease Trap Wastes	036L	036LC

By following these management procedures, the process of consolidated manifesting is simplified, and waste is specifically identified with each particular generator participating in a consolidated shipment. Even though the transporter is described as the generator on a Part 121 consolidated manifest, the actual individual generators remain responsible for those wastes.

A handwritten signature in black ink, appearing to be "J. J. J.", written in a cursive style.