

PPC 9452.1986(02)

MODIFIED MANIFEST WASTE MINIMIZATION CERTIFICATION  
FOR SMALL QUANTITY GENERATORS

OCT 20 1986

Dear State Hazardous Waste Director:

On March 24, 1986, the U.S. Environmental Protection Agency (EPA) promulgated final regulations for small quantity generators of between 100 and 1000 kilograms of hazardous waste in a calendar month (51 Federal Register 10146). Effective September 22, 1986, this rule requires these generators to use the multi-part "round-trip" Hazardous Waste Manifest (form 8700-22 and 22A) for all off-site shipments of hazardous waste.

In a Federal Register notice accompanying the March 24, 1986 final rule, the Agency explained that since it had not specifically addressed the issue of waste minimization in the proposed rule for small quantity generators, it was regulation public comment on whether these generators should be required to certify to waste minimization on the Uniform Hazardous Waste Manifest. As explained in the March 24, 1986 final rule, the requirements that generators of 100-1000 kg/mo certify to waste minimization on the manifest would automatically go into effect on September 22, 1986, the date these generators became subject to the Section 3002 generator standards, unless the Agency acted to exempt them.

On September 22, 1986, the Administrator of EPA signed a final rule explaining its decision not to exempt small quantity generators from the waste minimization requirement (see enclosed rule). In response to comments, the Agency has instead modified the waste minimization statement on the manifest as it applies to small quantity generators to require only a good faith effort to minimize waste generation and selection of what they believe to be the best available and affordable treatment, storage, and disposal alternative.

In addition to modifying the manifest form to include the new waste minimization language for small quantity generators, EPA has also modified the form to include a technical correction to the waste minimization statement applicable to generators of 1000 kg/mo and new OMB expiration date and form number. The revised form is effective immediately.

RO 12767

-2-

Enclosed are camera-ready copies of the revised manifest form. Camera-ready copies are also being sent to the manifest coordinators in those States which currently print and supply the manifest (see enclosed list). Although your State may not print and supply the form, we anticipate that many generators in your State, including small quantity generators and private printing firms, will request copies of the revised form.

If you have any questions about the new manifest form or about the waste minimization requirement, please contact Bob Axelrad on (202) 382-4769 or Carolyn Barley on (202) 382-2217.

Sincerely,

Marcia Williams  
Director  
Office of Solid Waste

Enclosures

cc: State and Regional Manifest Coordinators  
bcc: George Garland, State Program

RO 12767