



# University of New Haven

## POLICIES AND PROCEDURES

**Policy Title:**

**UNH Hazardous Waste  
Manifest Policy**

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**Responsible Office:** Department of Public Safety

**Responsible Official:** Associate VP of Public Safety & Administrative Services

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## **1. Policy Statement**

The University of New Haven (UNH) accumulates, offers for transport, and disposes of hazardous wastes in accordance with United States Environmental Protection Agency (EPA), Connecticut Department of Energy and Environmental Protection (CT DEEP) and Department of Transportation (DOT) regulations as they apply to Small Quantity Generators.

### **1.1. Purpose and Scope**

This plan provides a written description of the hazardous waste manifest procedures at the University of New Haven. This policy has been developed to comply with EPA (40 CFR 262) and CT DEEP (Section 22a-449(c)-102) regulations for the proper completion and distribution of manifest copies. In addition, this policy outlines the University of New Haven's internal manifest tracking system that is in place to ensure compliance with EPA and CT DEEP regulations.

### **1.2. Review**

The Associate Vice President of Public Safety and Administrative Services will review and update this policy whenever necessary or at least annually.

All the elements of this policy are considered University of New Haven policy and may be enforced as such. Failure on the part of the employees to follow the policy may result in disciplinary action.

## **2. Roles and Responsibilities**

The following individuals have these responsibilities with regard to this hazardous waste manifest policy.

### **2.1. Associate Vice President of Public Safety & Administrative Services**

- Ensure that only properly trained University personnel sign for all waste shipped on a hazardous waste manifest;
- Assume the generator's responsibility to ensure all waste manifests are appropriately and accurately filled out by any third-party vendors (e.g. proper waste codes, shipping names, etc. are used);

- If a return copy of manifest(s) has not been uploaded in the US EPA's e-manifest portal (RCRAInfo) within 35 days, inquire with transporter or end facility regarding status of hazardous waste and maintain written proof of this inquiry;
- If a return copy of the manifest(s) has not been returned within 60 days, file an Exception Report with the CT DEEP;
- Maintain any Exception Reports for at least 3 years;
- Maintain site details (e.g. regulated waste activities, generator status, contact information) through RCRAInfo;
- Update this policy as necessary or at least annually; and
- Keep at least the last three years of hazardous waste manifests on file and accessible in the event of an inspection from the US EPA or CT DEEP.

## **2.2. Associate Vice President of Facilities**

- Ensure that all facility personnel signing the hazardous waste manifests have received the appropriate training.

## **2.3. Facility Department Administrative Assistant**

- Obtain hazardous waste manifest from signee.

# **3. Hazardous Waste Manifests**

The University of New Haven offers for transportation of hazardous waste for off-site treatment, storage/or disposal and is required by EPA/CT DEEP regulations to prepare and complete a hazardous waste manifest for each shipment. The EPA and DOT requires all hazardous waste to be manifested using a Uniform Hazardous Waste Manifest (EPA form 8700-22).

## **3.1. Completing the Manifest**

All University of New Haven staff signing a hazardous waste manifest is required to have appropriate training to do so. Each signee must be current with their annual Resource Conservation

and Recovery Act (RCRA) hazardous waste training as well as having completed DOT training within the last three years.

The hazardous waste manifest is provided and filled out by the University of New Haven's hazardous waste transporter. However, it is the generator's legal responsibility to ensure this information is complete and accurate prior to signing. Third-party vendors do not have power of attorney and therefore may not sign manifests on behalf of the University of New Haven.

All manifests must, at a minimum, list the following information accurately and completely:

- The EPA Identification Number associated with the generator;
- A unique 12-digit tracking number associated with that specific manifest;
- An emergency response phone number available 24 hours a day for emergencies;
- The generator's and transporter's name, address, and direct contact information;
- The designated facility's name and address;
- The type and quantity of the waste, including the type of packages; and
- The UN identification number, proper shipping name, DOT hazard class and packing group number, and any RCRA or state waste codes.

The designee signing as the generator must be aware they are confirming the generator's certification, which states, "I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgement of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true." This holds the generator and shipper liable, rather than the transporter.

As of September 29, 2015, generators are no longer required to submit a copy of their completed manifest to DEEP. There is a [DEEP letter](#) that documents this change in procedure.

### **3.2. Confirmation of Delivery from the TSDF**

The University of New Haven should expect copy 3 of the manifest to be uploaded in the RCRAInfo e-manifest portal from the treatment, storage

and disposal facility (TSDF) within 60 days of the initial shipment. This will be a signed copy stating that the TSDF received the waste. If the University of New Haven does not receive this return copy within 35 days, the University should contact the TSDF to determine the location and status of the manifest. (Though this step is only mandatory for Large Quantity Generators, it is best practice to submit this request and maintain record.) If a signed copy of the manifest still has not been received after 60 days, the University must file an Exception Report to the CT DEEP.

Currently, TSDFs are phasing out the practice of mailing hard copies of signed manifests back to generators, and instead are utilizing the EPA's e-manifest system called RCRAInfo. If the University has not received a signed manifest from the TSDF, this e-manifest system should be checked before proceeding with Exception Reporting.

It is the responsibility of the Associate Vice President of Public Safety & Administrative Services to make certain that the above timelines and notifications are met.

#### **3.2.1. Exception Reporting**

An Exception Report must be filed with the CT DEEP if a hazardous waste manifest has not been returned by the TSDF within 60 days of its initial shipment date. This report should include a copy of the original manifest and cover letter describing the situation and any details taken to track down the manifest. Exception Reports must be kept onsite for at least 3 years, though it is recommended to maintain these indefinitely.

### **3.3. Manifest Tracking**

The University of New Haven uses an excel spreadsheet to track all hazardous waste shipments. This spreadsheet includes the following information:

- Manifest number;
- Date shipped;

- Designated facility; and
- Verification the TSDF copy was received by the University with 60 days of shipment.

It is the responsibility of the manifest signer to bring the signed manifest to the Associate Vice President of Public Safety & Administrative Services office and to add it to the appropriate hazardous waste manifest binder within two business days of signing the manifest.

The Associate Vice President of Public Safety & Administrative Services will make periodic inspections of both the tracking spreadsheet and the manifest binder to assure compliance with all applicable regulations.

### **3.4. Retention of Records**

The EPA and CT DEEP require that the generator of a hazardous waste retain a signed copy of the hazardous waste manifest for each shipment for at least three years. The original copy serves this purpose until he/she receives a signed copy from the designated (receiving) facility as confirmation of delivery. The copy received from the designated facility should be kept by the generator for at least three years from the date the waste was accepted by the initial transporter.

## **4. Land Disposal Restriction Forms**

Every hazardous waste manifest must be accompanied by a Land Disposal Restriction (LDR) form. This is a written notice that details treatment standards and specific requirements that generators, transporters, and TSDFs must meet. TSDFs are prohibited from disposing of hazardous waste without this form. LDRs should include the following information:

- EPA waste codes and manifest document number;
- Each chemical that is assigned the waste codes F001-F005 and F039;
- The underlying hazardous constituents (UHCs) for each waste assigned a characteristic waste code (D-code);
- Subdivisions made within a waste code based on waste-specific criteria; and
- Waste determination, if available.

Copies of the LDR must be maintained by the generator for at least 3 years from the date the waste was shipped. It is recommended that LDR copies be stored alongside the hazardous waste manifest records.

## 5. Administrative Duties

A copy of all University of New Haven hazardous waste manifests along with an updated manifest tracking spreadsheet can be found in the Associate Vice President of Public Safety & Administrative Services office.

## 6. Training

The University of New Haven shall ensure all signers of hazardous waste manifests have the required training.

All training records can be accessed in the Associate Vice President of Public Safety and Administrative Services office upon request, or on the Environmental Health and Safety shared folder. Records will be retained for as long as the manifest signer is employed by the University, and at least 3 years after employment ends.

### 6.1. RCRA Hazardous Waste Training

Manifest signers must receive Resource Conservation and Recovery Act (RCRA) hazardous waste training on an annual basis.

### 6.2. DOT Training

Manifest signers must also receive DOT training at least every 3 years. According to [49 CFR Part 172, Subpart H](#), DOT training must include the following:

- General awareness to recognize and identify hazardous materials;
- Function-specific training (e.g. truck placarding, segregation requirements, marking and labeling, manifest completion, etc.);
- Safety training concerning emergency response procedures and measures taken to prevent exposures and accidents; and
- Security awareness of risks associated with the transportation of hazardous materials, such as acts of terrorism, and the components of security plans, and in-depth security training if needed.



## 7. Additional Resources

The following resources may be useful in maintaining compliance with hazardous waste manifest requirements:

- [CT DEEP Hazardous Waste Manifest Requirements](#)
- [A Roadmap to RCRA: Small Quantity Generator Requirements \(CT DEEP, 2009\)](#)