



Consolidated Manifesting Requirements

This fact sheet summarizes the consolidated manifesting requirements for hazardous waste generators.

Consolidated Manifesting

Consolidated manifesting (formerly known as modified manifesting or milk-runs) allows certain registered hazardous waste transporters to combine specified wastes from multiple eligible generators on a single manifest rather than using a separate manifest for each generator. The generators using the consolidated manifesting procedure are exempt from filling out a hazardous waste manifest. The consolidated transporter completes both the generator and the transporter sections of the manifest. Consolidated manifesting does not authorize a hazardous waste transporter to commingle different types of hazardous wastes in the same tank or container.

Requirements

Generators are responsible for their hazardous wastes “from cradle to grave.” The consolidated manifesting procedure does not exempt generators from the requirements to properly characterize, handle, label, manage, and accumulate hazardous wastes. To be eligible to participate in the consolidated manifesting procedure, a generator and their hazardous waste must meet specified requirements, as summarized below.

Eligible Hazardous Wastes

Eligible hazardous waste for the consolidated manifesting procedure includes both Resource Conservation and Recovery Act (RCRA) waste and non-RCRA hazardous waste. However, only the following waste streams are eligible:

- Used oil
- Solids contaminated with used oil
- Antifreeze
- Parts cleaning solvents
- Spent photographic solution
- Asbestos & asbestos-containing materials
- Chemicals & lab packs from K-12 schools
- Hydroxide sludge*
- Contents of an oil/water separator
- Brake fluid
- Antifreeze sludge
- Paint-related wastes, including filters & sludge
- Dry cleaning solvents, including filters & sludge
- Inks from the printing industry
- Filters from fuel dispensing pumps
- Absorbents contaminated with these wastes

*Hydroxide sludge must be contaminated solely with metals from a wastewater treatment process.

Generator Eligibility

To be eligible to participate in the consolidated manifesting procedure, the generator must meet the following requirements:

- **Identification Number:** All generators using the consolidated manifesting procedure must have an identification number unless exempted from manifesting requirements as generators of less than 100 kilograms of “silver-only” hazardous wastes. Generators of RCRA hazardous wastes in quantities less than 100 kilograms per month, or any amount of non-RCRA hazardous wastes, must (at a minimum) obtain a permanent California hazardous waste identification number. Generators of RCRA hazardous wastes in quantities greater than 100 kilograms per month must obtain a U.S. Environmental Protection Agency (EPA) hazardous waste identification number.
- **Small Quantity Generator:** All generators using the consolidated manifesting procedure must generate less than 1,000 kilograms per month of total hazardous waste. The generator may exclude the amount of

used oil and the contents of the oil/water separator in calculating 1,000-kg/month limits.

Consolidated Transporters: To operate under the consolidated manifesting procedure, generators must use State registered hazardous waste transporters who have notified the Department of Toxic Substances Control of their intent to operate under the consolidated manifesting procedure.

Treatment Agreement: To operate under the consolidated manifesting procedure (for certain eligible waste streams – excluding asbestos, asbestos-containing materials, and chemicals and laboratory packs collected from K-12 schools), the transporter must agree in writing to confirm to the generator that the hazardous wastes were transported to an authorized facility for appropriate treatment. That agreement may be on a consolidated manifest receipt or a separate document.

Reclamation Agreement: To transport RCRA hazardous wastes from a generator who generates more than 100 kilograms but less than 1,000 kilograms per month of RCRA hazardous waste without a separate manifest there must be a reclamation agreement between the generator and the reclaimer of the waste, who must also be the transporter. The following conditions must be met:

- The type of waste and frequency of shipments are specified in the agreement.
- The vehicle used to transport the waste to the authorized facility and to deliver the regenerated material back to the generator is owned and operated by the reclaimer of the waste.

A reclaimer nullifies their reclamation agreement with a generator if the hazardous wastes are transferred to another vehicle not owned and operated by the reclaimer. The generator is not allowed to use consolidated manifesting if any of the conditions governing reclamation agreements are not met.

Record Keeping

To operate under the consolidated manifesting procedure, generators are required to keep the following documentation:

- Receipts: Generators must keep all copies of the consolidated manifest receipts for at least three years from the date of shipment of the hazardous waste.
- Reclamation Agreement: If applicable, generators must maintain copies of their reclamation agreements for at least three years after termination or expiration of the agreement.

Note: This fact sheet is intended for informational purposes only and may not encompass all the laws and regulations to this topic. More details may be found at Cal/EPA Department of Toxic Substance Control: www.dtsc.ca.gov. If further information is needed, call the County of Los Angeles CUPA at (323) 890-4045, or your local district office.

References

- California Health and Safety Code 25160.2
- Cal/EPA DTSC Fact Sheet: “Consolidated Manifesting: Hazardous Waste Generator Requirements”