ORD 7398
1A
8/25/82

inter office memo

To: Rick Seitz

8/25/82

From: W.D. Hartford

Subject: Manifest requirements by TS facilities

reference key provisions of license:

(B10) The licensee shall not accept a manifested shipment of hazardous waste unless the collection or treatment facility is designated as the receiver on the manifest. All hazardous waste shipments equal to or greater than 2000 lbs (250 gal.) must be manifested.

(B12) All containers of waste received for [collection, storage and/or] treatment shall be identified sufficiently to assure rapid positive identification of the contents of those containers. waste that cannot be treated shall be considered as the licensee's waste and marked with the date when such determination was made.

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Condition B12, when it was modified to include collection, may be misinterpreted. The intent for treatment facilities was to encourage prior testing of shipments for treatment. The way the condition now reads, with the insertion of "collection, storage", it could be construed to mean all waste shipped

licensee waste & ~~[illegible]~~ re-manifested.

~~[illegible]~~

Two options seem to be possible to rectify this license condition.

(1) re-open the license & ~~[illegible]~~ clarify condition B12 or,

(2) meet with Van Water & Rogers & reach an agreement to provide better identification and tracking of waste shipments.

another brief topic on manifesting —

(1) Each time an inspection is made by the agency several random manifests, as returned by the TSD facility to the generator, should be inspected ~~& [illegible]~~ for completeness & accuracy. Particularly waste type descriptions & ~~[illegible]~~ UN/NA numbers etc.

I would suggest that a short 10 minute meeting be held ~~[illegible]~~ with Greg Baesler, Steve Sandor & myself ~~[illegible]~~ to decide how to handle the above situation with VWR.