



Hazardous Waste Management Plan

Benjamin Franklin Bridge
Betsy Ross Bridge
Commodore Barry Bridge
Walt Whitman Bridge

In NJ and PA

BH No. 77397-01

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1. Introduction and Purpose

- 1.1 The purpose of this Hazardous Waste Management Program is to provide information and guidance to DRPA facility personnel regarding the management of the wide range of waste generated at Delaware River Port Authority (DRPA) facilities.
- 1.2 Personnel from each facility, operation, and shop are expected to review, understand, and implement the procedures identified in this program.
- 1.3 The Bridge Director is responsible for ensuring compliance with this program at each bridge facility.
- 1.4 An appointed DRPA Fleet Manager/Environmental Director will verify that each facility, operation, and shop is in compliance with this program. See Appendix 1 for the current list of responsible DRPA personnel, by facility, and the information for the DRPA Fleet Manager/Environmental Director.
- 1.5 This plan is an update to the "HAZARDOUS WASTE MANAGEMENT PROGRAM FOR DELAWARE RIVER PORT AUTHORITY FACILITIES" dated August 2004 by KTA-Tator, Inc. The source of material for this report update was taken from this document.

2. Description of Applicable DRPA Facilities and Operations

- 2.1 DRPA maintains four (4) locations that generate and store hazardous waste. Each location holds its own EPA Generator Identification Number. The locations are listed below:
 - A. Benjamin Franklin Bridge – EPA Generator ID No. NJD981489941
 - 1) Specific locations at the Benjamin Franklin Bridge where hazardous waste may be generated and/or stored include:
 - a. Print Shop – photo developer/reducer, parts washer solvent, contaminated cotton pads
 - b. Auto Shop – parts washer, brake cleaning fluid, waste paints and thinners, waste fuel, used oil, pig mats, used oil filters, used fuel filters, used vehicles batteries, aerosol cans
 - c. Facility Maintenance – paints and thinners, used batteries
 - d. Electric Shop – fluorescent bulbs, mercury lamps, PCB ballasts
 - e. Miscellaneous – found materials
 - B. Betsy Ross Bridge – EPA Generator ID No. NJD981490584
 - 1) Specific locations at the Betsy Ross Bridge where hazardous waste may be generated and/or stored include:
 - a. Auto Shop – parts washer, brake cleaning fluid, waste paints and thinners, waste fuel, used oil, pig mats, used oil filters, used fuel filters, used vehicle batteries, aerosol cans
 - b. Facility Maintenance – paints and thinners, used batteries
 - c. Electric Shop – fluorescent bulbs, mercury lamps, PCB ballasts
 - d. Miscellaneous – found materials

C. Commodore Barry Bridge – EPA Generator ID No. NJD981489933

- 1) Specific locations at the Commodore Barry Bridge where hazardous waste may be generated and/or stored include:
 - a. Auto Shop – parts washer, brake cleaning fluid, waste paints and thinners, waste fuel, used oil, pig mats, used oil filters, used fuel filters, used vehicle batteries, aerosol cans
 - b. Facility Maintenance – paints and thinners, used batteries
 - c. Electric Shop – fluorescent bulbs, mercury lamps, PCB ballasts
 - d. Miscellaneous – found materials

D. Walt Whitman Bridge – EPA Generator ID No. PAD981113525

- 1) Specific locations at the Walt Whitman Bridge where hazardous waste may be generated and/or stored include:
 - a. Auto Shop – parts washer, brake cleaning fluid, waste paints and thinners, waste fuel, used oil, pig mats, used oil filters, used fuel filters, used vehicle batteries, aerosol cans
 - b. Facility Maintenance – paints and thinners, used batteries
 - c. Electric Shop – fluorescent bulbs, mercury lamps, PCB ballasts
 - d. Miscellaneous – found materials

2.2 Each bridge facility has a combination of satellite storage areas located throughout the facility as well as a single central storage area. See Figure 1A through Figure 4 in Appendix 8 for the location of the central storage area for each bridge facility.

3. Waste Determination(s)

- 3.1 In order to properly manage and dispose of wastes, the type of waste that is being disposed of must first be determined.
 - A. Materials are considered “waste” when the generator has determined that the material has no further use and can be discarded. Items that will be reclaimed, recycled, or reused (i.e. spent batteries) are not to be classified and regulated as waste.
 - B. A hazardous waste is a material that has properties that make it dangerous and, if not properly managed, has the capability of causing harm to humans and/or the environment.
 - C. A waste can be characterized as hazardous by using applicable product knowledge (i.e. SDS information or previous test results) or by performing laboratory analysis on the waste.
 - D. HAZARDOUS WASTE – A material can be considered a “hazardous” waste if the United States Environmental Protection Agency (US EPA) or the New Jersey Department of Environmental Protection (NJ DEP) specifically list it as a hazardous waste or if it exhibits one or more of the hazardous waste characteristics.

- 1) Listed hazardous wastes include those wastes that the EPA has determined are inherently hazardous to humans or the environment.
- 2) Characteristic hazardous wastes are those that exhibit one or more of the following characteristics of a hazardous waste:
 - a. Ignitability – A liquid that has a flash point less than 140°F. Ignitable wastes are assigned an EPA Waste Number of D001.
 - b. Corrosivity – A liquid that has a pH less than or equal to 2.0 or greater than or equal to 12.5. Corrosive wastes are assigned an EPA Waste Number of D002.
 - c. Reactive – Explosives or materials that react violently, generate toxic fumes, or form potentially explosive mixtures when mixed with water. Reactive wastes are assigned an EPA Waste Number of D003.
 - d. Toxicity – A waste that exceeds the Maximum Concentration Level (MCL) of any toxicity contaminant specified by the US EPA or NJ DEP regulations. The test method used to determine the toxicity is the Toxicity Characteristic Leaching Procedure (TCLP). The Threshold Limit Values (TLV) for toxicity for the eight (8) RCRA metals and their corresponding EPA Waste Numbers are as follows; if the concentrations of a leachable RCRA metal exceeds the TLV (as determined by TCLP), then the waste is classified as a hazardous waste.

Metal	EPA Waste No.	TLV (mg/L)
Arsenic	D004	5.0
Barium	D005	100.0
Cadmium	D006	1.0
Chromium	D007	5.0
Lead	D008	5.0
Mercury	D009	0.2
Selenium	D010	1.0
Silver	D011	5.0

- E. NON-HAZARDOUS WASTE – Non-hazardous wastes are solid and liquid wastes that are not listed by either US EPA or NJ DEP regulations and do not exhibit any of the hazardous waste characteristics. The majority of the wastes generated at DRPA facilities are non-hazardous wastes.
- F. UNIVERSAL WASTES – Universal wastes are any wastes that are regulated under 40 CFR 273, Standards for Universal Waste Management. Typical examples of the Universal Wastes include batteries, oil filters, pig mats, and lamps.
- G. RECYCLABLE MATERIALS – Recyclable materials are forms of waste that are exempt from US EPA and NJ DEP regulations because they can be properly recycled/reused. The most common examples of recyclable wastes located at DRPA sites are spent vehicle batteries and waste oil.
- H. To determine the exact type of waste and the best way to handle the waste, refer to the OSHA Safety Data Sheets (SDSs). Online versions of these sheets can be found here: <https://chemicalsafety.com/sds-search/>

4. Waste Generator Status

- 4.1 The amount of hazardous waste a facility generates in a month will determine the level of regulatory requirements that must be met. There are three types of generators: large quantity, small quantity, and very small quantity.
- A. LARGE QUANTITY GENERATOR (LQG) – A facility that generates more than 2,200 pounds of hazardous waste per month. This is equivalent to approximately 5 1/2 55-gallon drums of hazardous waste per month. LQGs have no limit on the quantity of hazardous waste that can be accumulated, but it must be transported off-site for disposal within 90 days of the start of accumulation.
 - B. SMALL QUANTITY GENERATOR (SQG) – A facility that generates between 220 and 2,200 pounds of hazardous waste per month. This is equivalent to approximately ½ to 5 1/2 55-gallon drums of hazardous waste per month. SQGs may not accumulate more than 13,200 pounds of hazardous waste, and it must be transported off-site for disposal within 180 days of the start of accumulation (270 days if the shipping distance is greater than 200 miles).
 - C. VERY SMALL QUANTITY GENERATOR (VSQG) – A facility that generates less than 220 pounds of hazardous waste per month. VSQs may not accumulate more than 2,200 pounds of hazardous waste, but do not have a time limit on when it must be transported off-site after the start of accumulation.
 - D. The actual generator status of any DRPA facility will vary, as it depends upon the scope of operations over a given calendar year. The assigned personnel within each facility and the DRPA Fleet Manager/Environmental Director are responsible for tracking monthly generation in order to determine the current generator status. They must also verify that the appropriate regulatory requirements for the applicable generator status are being met.
 - E. Because it is possible for a facility to change from LQG to SQG status within a given calendar year, no more than 13,200 pounds of hazardous waste should be accumulated by any facility at any time before shipment off-site.
 - F. The specific requirements applicable to each type of generator under US EPA regulations are detailed in Appendix 2.

5. US EPA Generator Identification Numbers

- 5.1 The US EPA and NJ DEP require that all hazardous waste generators register their generation status by obtaining a US EPA Generator Identification Number. This number is used to track waste from initial generation to disposal. Facilities also contain a Generator Identification Number for medical wastes that are produced. The Current EPA Generator ID Numbers for DRPA Facilities are:

Facility	US EPA ID No.	Medical Waste ID No.	Generator Status (2021)
Benjamin Franklin Bridge	NJD981489941	933777	SQG
Betsy Ross Bridge	NJD981490584	933770	SQG
Commodore Barry Bridge	NJD981489933	933768	SQG
Walt Whitman Bridge	PAD981113525	933742	SQG

DRPA also receives separate waste generator numbers for paint projects that produce large amounts of waste. The contractor for the project typically acquires these numbers. These numbers are available when the project is in progress.

6. General Waste Management Guidelines

6.1 The following General Waste Management Guidelines apply to solid hazardous wastes and all liquid wastes at DRPA Facilities.

A. General

- 1) Containers are stored away from high traffic areas and uncontrolled floor drains.
- 2) Containers are stored on impervious surfaces (e.g. concrete or asphalt) and/or secondary containment (i.e. spill control pallets) as needed.

B. Segregation

- 1) Separate containers must be used for each type of waste.

C. Containers

- 1) All waste must be collected in DOT approved drums or containers. Containers must be kept in good condition and must be kept closed at all times, except when adding waste.

D. Labels

- 1) All containers containing waste must be labeled or marked.
- 2) If the waste is hazardous, the label must include the words "Hazardous Waste", the composition and physical state of the contents of the container (i.e. "Waste Gasoline"), a statement regarding the hazardous properties of the waste, the name, and the address of the generator (DRPA), and the date that the waste was first placed into the container. If the container is moved to central storage, then the container shall also be labeled with the accumulation date (the date the container was placed in central storage – beginning of 90 day holding time for LQG).
- 3) If the waste is non-hazardous, universal, or recycled, the label should state the type of waste and identify the contents of the container (i.e. Universal Waste – Fluorescent Light Bulbs).
- 4) Labels should be in good condition, legible, and facing outward so that they are clearly visible.
- 5) Labels should be marked with an indelible permanent marker. Labels shall not be marked with ink, pencil, or anything that can be erased/altered.
- 6) See Appendix 3 for sample labels.

7. Waste Storage

7.1 Waste storage at the facilities will likely include both satellite and central storage.

7.2 SATELLITE STORAGE OF HAZARDOUS WASTE

A. Temporary storage of hazardous waste that is maintained at or near the point of generation is called satellite storage. The US EPA allows satellite storage of any hazardous waste up to 55 gallons. This storage amount is allowed this way for several purposes; minimizing the amount of time spent handling the waste and the associated risks with increased handling time, increase of disposal efficiency, and being able to control costs. Satellite storage is permissible under the following conditions:

- 1) Containers are under the direct control of a person who is responsible for the process that is generating the waste.
- 2) The waste has been properly labeled.
- 3) Weekly inspections are performed and documented (See Appendix 4).
- 4) Containers that reach the accumulation limit of 55 gallons are either:

- a. Moved to the central storage location, have the accumulation date marked, and are transported off-site within 90 days OR
- b. Transported directly off-site from the satellite storage area within three (3) days of being filled.

7.3 CENTRAL STORAGE OF HAZARDOUS WASTE

- A. Central storage locations are designated storage areas, located within the DRPA facility, used for central collection of all hazardous wastes for disposal. Central storage areas are to be located on impervious surfaces. Once wastes are placed in central storage, the following conditions apply:
 - 1) Containers are labeled with the information identified in 6.1.D.2 above.
 - 2) Containers are labeled with the accumulation start date (the date the container was placed in Central Storage).
 - 3) Weekly inspections are performed and documented (See Appendix 4).
 - 4) Hazardous waste must be transported off-site within 90 days of being placed in central storage. There is no storage limit timeframe for non-hazardous and recycled wastes.

7.4 STORAGE OF NON-HAZARDOUS, UNIVERSAL, AND RECYCLABLE WASTE

- A. Non-hazardous, universal, and recyclable wastes are not subject to limitations on storage time or specific quantity restrictions.
- B. Responsible DRPA personnel should track the generation, storage, and transportation of non-hazardous and universal wastes and recyclable materials separately from hazardous waste.
- C. Non-hazardous, universal, and recyclable materials may be stored either in satellite or central storage locations. Full drums of material should be placed in central storage.
- D. Vendor pick-ups of non-hazardous and universal wastes and recyclable materials should be performed in conjunction with hazardous waste pick-ups. However, the frequency of pick-ups should be dictated by the amount of hazardous waste, irrespective of the quantity or accumulation time of non-hazardous and universal wastes or recyclable materials.

7.5 Container Storage Inspections

- A. Areas where containers of hazardous waste are stored are inspected on a weekly basis at a minimum for leaks, deterioration, and other conditions.
- B. See Appendix 4 for the "Weekly Container Storage Area Inspection Log."
- C. Container inspection logs should be maintained on file at the same facility that contains the hazardous waste documentation.

8. Transportation and Disposal

- 8.1 Transportation and disposal of hazardous and non-hazardous waste should be coordinated through the current DRPA waste vendors. A list of vendors and the types of waste they typically manage is as follows:

Vendor	Type of Waste	Characterization
ACV Enviro	Paint, Rags, Cleaning Solvents, Used Oil Filters and Filter Media, PCB Ballasts, Fluorescent Bulbs, Photographic Chemicals, Waste Fuel, Aerosol Cans	Hazardous Non-Hazardous Universal
IPC/US Filter	Waste Oil	Recycled
Various Battery Distributors (i.e. NAPA, Auto Zone)	Automobile Batteries	Recycled

- 8.2 Vendors may perform waste pick-ups on a scheduled basis (e.g. every 45 days) or can be contacted by the Bridge Director and personnel on an as-needed basis.
- 8.3 DRPA facilities may arrange similar services with other approved vendors for non-hazardous and universal wastes or recycled materials pick-ups. The DRPA Fleet Manager/Environmental Director should be advised of all waste vendors being used at the various facilities.

9. Record Keeping

- 9.1 Vendors typically assist in the preparation of the required documentation for shipping.
 - A. Non-hazardous and universal waste shipments are documented in a “Bill of Lading.”
 - B. Hazardous waste shipments are documented by a “Uniform Hazardous Waste Manifest.” See Section 10.
 - C. Waste Profile Sheets – Bills of Lading and Manifests may be accompanied by a material or waste profile sheet. These sheets provide a description of the waste. A copy of the waste profile sheet should be retained with any applicable Manifest or Bill of Lading.
 - D. Land Disposal Restriction Notification – A land disposal restriction notification and certification form may accompany Manifests. This form indicates that the hazardous waste requires treatment or stabilization at the Treatment, Storage and Disposal Facility (TSDF) prior to being disposed of in a landfill.
 - E. Responsible DRPA facility personnel should review and sign the Bill of Lading and Manifests and should retain a copy for the site records. The original Manifests or Bill of Lading should be forwarded to the DRPA Fleet Manager/Environmental Director.
 - F. See Appendix 5 for non-hazardous and hazardous waste pick-up tracking logs.

10. Manifests

- 10.1 An initial “Uniform Hazardous Waste Manifest” will be generated by the TSDF during pick-up of the waste. This Manifest will accompany the waste during transport to the TSDF.
- 10.2 Review of the Initial Manifest – The Bridge Director or designee should review and confirm the following information on the initial manifest for completeness and accuracy. Complete instructions for the completion of manifests can be found in Appendix 6. A summary of the requirements is as follows:
 - A. Manifest State – Verify that the manifest was completed using the state-specific manifest for the state to which that waste will be consigned or sent. If a state-

specific manifest is not available, then the manifest for the state of generation should be used.

- B. Item 1 (Generator US EPA ID Number/Manifest Number) – Verify that the EPA ID Number for the site is correct. Verify that a unique manifest document number has been recorded. Note: If a state-specific manifest is used, then the state-specific number (Item 3.A) should be used.
- C. Item 3 – Verify that the emergency response phone number is the number of the generator, or is the number of someone who is knowledgeable on the hazardous waste being shipped.
- D. Item 4 – Verify that the unique tracking number was preprinted on the Manifest by the forms printer.
- E. Item 5 – Verify that this section includes the generator’s name (DRPA), contact name, address, and telephone number:

ATTN: Steve Reiners, DRPA Fleet Manager/Environmental Director
“XXXXX” Bridge
Delaware River Port Authority
PO Box 1949
Camden, NJ 08101
(609) 820-7372

- F. Items 6&7 – Verify that the Transporter’s name and address as well as the Transporter EPA and State ID Numbers are indicated in the appropriate sections. Note that if the Transporter is also the TSDF, they may also have the same EPA ID Number.
- G. Item 8 – Verify that the designated disposal facility’s name, address, EPA ID Number, and State Facility ID Number are indicated in the appropriate sections.
- H. Item 9 – Verify that the type of waste is listed using the U.S. DOT description.
- I. Item 10 – Verify that the number and type of containers correspond to the waste being transported. Typical designations of type are:

DM = Metal drum
CM = Metal boxes, cartons, or cases
BA = Burlap, cloth, paper or plastic bags

- J. Item 11 – Verify that the contractor has estimated a total quantity for the waste being transported and the units reported. Typically the units are designated as:

P = Pounds (drums)
T = Tons (drums or roll-offs)
CY = Cubic Yards (tote boxes or roll-offs)

- K. Item 12 – Verify that appropriate units of measure are being used and recorded.
- L. Item 13 – Verify that the EPA waste number is correct and completed for the type of waste being transported. EPA Waste Numbers can be found in 40 CFR 261. Typical EPA ID waste numbers for waste generated by DRPA include:

- D001 – Ignitable Waste
- D002 – Corrosive Waste
- D004 – Arsenic
- D005 – Barium
- D006 – Cadmium
- D007 – Chromium
- D008 – Lead
- D009 – Mercury
- D010 – Selenium
- D011 - Silver
- D018 – Benzene (Waste Fuels)
- D039 – Tetrachloroethylene (Parts and Brake Washer)
- D040 – Trichloroethylene (Parts Washer)

- M. Items 14 – This section allows for additional descriptions of the material being transported (i.e. 95% solid debris, 5% PPE) or can provide specific handling instructions or codes relative to the handling requirements for the waste prior to disposal.
- N. Item 15 – The Bridge Director or designee should print and sign his/her name in this section after review of the above items.
- O. Item 17 – The Bridge Director or designee should witness the signature of the Transporter and verify that he/she dates the form.
- P. After all signatures have been placed on the form, the Bridge Director should make and retain a copy of the initial manifest. The original (top) copy of the manifest should be forwarded to the DRPA Central Fleet Manager/Environmental Director.
 - 1) The New Jersey Manifest contains 8 copies. The Bridge Director or designee should retain copy 3 (Generator copy). The TSDF will return copy 8 to the DRPA Fleet Manager/Environmental Director.

10.3 Review of the Final Manifest – The TSDF should send copy 8 of the final manifest to the DRPA Fleet Manager/Environmental Director that was identified on the form. If the form is not received within 35 days of the date of the initial manifest, then tracking must be initiated. This requires the DRPA Fleet Manager/Environmental Director to contact the transporter and TSDF as needed in order to determine the location and disposition of the waste. If the final manifest is not received within 45 days, an exemption report must be filed with NJ DEP.

- A. Upon receipt of the final manifest, the DRPA Fleet Manager/Environmental Director should review and compare the initial manifest to the final manifest for any inconsistencies.
- B. Item 18 of the final manifest should be specifically reviewed to determine if the TSDF indicated any significant discrepancy between the waste described in the manifest and the waste actually received by the facility. The most common discrepancies are typically between the total quantities reported on the manifest (generally an estimated value) and the actual weight of the waste received (based on the weight of the vehicle). In the event that the discrepancy is greater than 10%, the TSDF should specifically note the correct amount.
 - 1) The final manifest may include copies of tare weight, gross weight, and net weights from the vehicle weight station. The net weight is typically used by the TSDF as the amount of waste received. This amount must correspond to the

- weight reported in Item 11 of the manifest, or the discrepancy must be noted in Item 18.
- 2) If there are no discrepancies, then Item 18 will generally be marked "Shipment OK" by the TSDF.
- C. Discrepancies must be resolved between the DRPA and the TSDF so that consistent data can be reported to the EPA as part of the generator (DRPA) and TSDF biennial reporting requirements.

11. Tracking and Document Retention

- 11.1 The DRPA Fleet Manager/Environmental Director should maintain a master file of all the original documentation associated with the tracking, testing, storage, and transportation of hazardous wastes.
 - A. The DRPA Fleet Manager/Environmental Director will receive the original initial manifest (NJ Copy 3) from the Bridge Director or designee after the shipment has left.
 - B. The DRPA Fleet Manager/Environmental Director will receive the original final manifest (NJ Copy 8) from the TSDF. A copy should then be provided to the appropriate Bridge Director or designee.
- 11.2 The Bridge Director or designee should maintain copies of initial and final manifests, and a tracking log of the Manifests and Bills of Lading that have been prepared for the project.
 - A. The Bridge Director or designee should make and retain a copy of the initial manifest (NJ Copy 3) prior to sending it to the DRPA Fleet Manager/Environmental Director.
 - B. The Bridge Director or designee will receive a copy of the final manifest (NJ Copy 8) from the DRPA Fleet Manager/Environmental Director following receipts from the TSDF.
- 11.3 Records should be organized chronologically by date of shipment and manifest number.
- 11.4 Federal and New Jersey regulations require that records be maintained a minimum of three years after generation has been completed.
- 11.5 Tracking logs – The DRPA Fleet Manager/Environmental Director and the Bridge Director or designee should maintain a hazardous manifest tracking log to assist in summarizing, tracking, and reception of all required documentation.
 - A. A hazardous waste manifest tracking log is located in Appendix 7. The tracking log contains spaces to record the following information:
 - 1) Manifest Number
 - 2) Date of Shipment/Manifest Date
 - 3) Number of Containers/Type
 - 4) Weight of Waste/Units of Measure
 - 5) Date that Final Manifest was received by DRPA
 - 6) Weight of waste received by TSDF (based on truck weight)
 - 7) Discrepancies noted in Item 18 of Final Manifest (yes or no). If yes, resolution is required.
 - 8) Tracking Initiated – If final manifest is not received in 35 days, record date that tracking was initiated.
 - 9) Exemption Report Filed – If final manifest is not received in 45 days, record date that exemption report is filed with NJ DEP.

- 10) Date that Certificate of Disposal is received by DRPA.
- 11) Comments.
- B. Tracking logs should be updated upon generation of the initial manifest and periodically reviewed at a sufficient frequency to verify that the appropriate documentation is received in accordance with regulatory deadlines.
- C. Certificates of Disposal – Certificates of Disposal are required to be provided by the TSDF, to the generator (DRPA), for lead paint and other wastes that are subject to Land Disposal Regulations, 40 CFR 268. Lead and other toxic metals must be stabilized (render the waste as non-hazardous) by the TSDF prior to disposal on land. The Certificate of Disposal certifies that treatment was performed.
 - 1) The DRPA Fleet Manager/Environmental Director should verify that a Certificate of Disposal is received for each shipment of hazardous waste. The Certificate of Disposal should accompany the final manifest or should be received no later than one month after shipment.
 - 2) If the Certificate of Disposal is not received within one month of shipment, the DRPA Fleet Manager/Environmental Director should contact the TSDF directly to request the Certificate.

12. Biennial Reports

- 12.1 Federal, New Jersey, and Pennsylvania hazardous waste regulations require that large quantity generators prepare reports on manifest activities on each even year, for the previous odd year (biennially).
- 12.2 The DRPA Fleet Manager/Environmental Director tracks the generation of waste at all DRPA facilities, in coordination with the Bridge Director or designee, and determines whether or not the facility is considered a large quantity generator for the previous year. If so, the DRPA Fleet Manager/Environmental Director prepares a biennial report.
- 12.3 Biennial reports are prepared in and submitted to the state of generation.
 - A. The Benjamin Franklin, Betsy Ross, and Commodore Barry Bridges are located in New Jersey and are regulated by NJ DEP.
 - B. The Walt Whitman Bridge is located in Pennsylvania and is regulated by PA DEP.
- 12.4 The US EPA provides biennial report forms and information on its website. Pennsylvania utilizes the US EPA reporting system. That website address is:
<https://www.epa.gov/hwgenerators/biennial-hazardous-waste-report>
- 12.5 The biennial report details the generator's (DRPA) activities during the previous calendar year and includes:
 - A. The Generator's EPA Identification Name, Number, and address.
 - B. The Transporter's EPA Identification Name, Number, and address.
 - C. The TSDF's EPA Identification Name, Number, and address.
 - D. Descriptions and quantities of waste

13. Employee Training

- 13.1 Applicable DRPA facility personnel are provided training relative to the facilities generation status as a small quantity or large quantity generator.
- 13.2 When the facility is a large quantity generator, applicable facility personnel are provided initial and annual training consistent with the requirements of 40 CFR 265.16 and 40 CFR 273.36.
- 13.3 When the facility is a small quantity generator, applicable facility personnel are provided basic waste handling familiarization and training in the emergency procedures in accordance with 40 CFR 262.16 and 40 CFR 273.16.
- 13.4 At a minimum, training must be sufficient to ensure that applicable facility personnel understand basic hazardous waste handling procedures and are able to respond effectively to emergencies related to hazardous waste.
- 13.5 The Bridge Director for each DRPA facility should maintain documentation of training by job title, description of the training, and the dates when the training took place. Records should be maintained on-site at each facility.

14. Waste-Specific Guidelines

- 14.1 The following pages describe the types of waste typically generated by DRPA facilities and provide guidance on accumulation, labeling, storage areas, and disposal.
- 14.2 Types of waste include:
 - A. Batteries
 - B. Oil Spill Debris
 - C. Paint
 - D. Rags
 - E. Cleaning Solvents
 - F. Waste Oil
 - G. Used Oil Filters and Filter Media
 - H. Fluorescent Bulbs
 - I. PCB-Containing Light Ballasts
 - J. Mercury Lamps
 - K. Photographic Chemicals (Benjamin Franklin Bridge Only)
 - L. Waste Fuels (Gasoline/Diesel/DEF)
 - M. Miscellaneous/Unique Wastes

BATTERIES

Type of Waste

1. Alkaline Batteries – Universal
2. Nickel-Cadmium Batteries (Ni-Cd) – Universal
3. Lead Acid Batteries (Automobile) - Recyclable

Generation

1. Alkaline Batteries – Result from the replacement of small everyday batteries and typically come from small handheld devices such as calculators, flashlights, etc.
2. Nickel-Cadmium Batteries – Result from the replacement of batteries in small electronic devices (i.e. radios).
3. Lead Acid Batteries – Result from the replacement of batteries in automobiles.

Accumulation

1. Containers
 - a. Alkaline Batteries: Collected in 5 to 55-gallon containers.
 - b. Nickel-Cadmium Batteries: Collected in 5 to 55-gallon containers.
 - c. Lead Acid Batteries: Collected on over-pack trays.
2. Labels
 - a. Alkaline Batteries: Label Container as “Universal Waste – Alkaline Batteries”
 - b. Nickel-Cadmium Batteries: Label container as “Universal Waste – Ni-Cd Batteries”
 - c. Lead Acid Batteries: Label container as “Recyclable Materials – Batteries”
3. Storage Area
 - a. Alkaline and Nickel – Cadmium Batteries – Satellite accumulation in auto shop, up to one (1) 55-gallon drum. When the accumulation exceeds one (1) 55-gallon drum then:
 - i. Move to central storage, mark accumulation date, and arrange for pick-up within 90 days,
OR
 - ii. Arrange for pick-up from satellite storage within three (3) days.
 - b. Lead Acid Batteries – Satellite accumulation in the auto shop in an over-pack tray. Do not accumulate more than one over pack tray.

Disposal

1. Alkaline and Nickel-Cadmium Batteries – Disposal through ACV as “Universal Waste – Batteries”.
2. Lead Acid Batteries – Recycled by various local battery distributors.

OIL SPILL DEBRIS

Type of Waste

The most common oil products that need cleaned up and cause oil spill debris are:

1. Hydraulic Oil – hydraulic oil from trucks and heavy equipment.
2. Gasoline/diesel
3. Lube Oil – Bearing or crank case oils

Oil spill debris will typically come in one of two forms, “pig mats” or oil absorbent powder/sand. Oil spill debris can be classified as Non-Hazardous Waste, however it can also be considered flammable.

Generation

Oil Spill debris is generated by DRPA operations in one of two ways. The first is any spill from a variety of oil products located around the DRPA Facility. The second is from the clean-up of automobile accidents on any of the bridges.

Accumulation

1. Containers
 - a. 55-gallon plastic/metal drum, closed-top.
2. Labels
 - a. Label material as “Non-Hazardous Waste” and identify the contents (e.g. Pig Mats, Oil Absorbent) as appropriate.
 - b. Include a standard “Flammable” label next to the Non-Hazardous Waste label. This label can be the same type of label used on the storage cabinets for flammable liquids.
3. Storage Area
 - a. Satellite accumulation in auto shop. No limit on accumulation quantity or time.

Disposal

Disposal of oil spill debris through ACV as non-RCRA, non-DOT waste.

PAINT

Type of Waste

1. Unused Paint – Hazardous
2. Paint Thinner – Hazardous
3. Paint Cleaning Wastes – Hazardous

Generation

Typical paint wastes are generated by the expiration of paint, as well as the need to no longer use a certain paint. Wastes can also be generated from paint thinners that are contaminated by different types of paints and can no longer be used.

Accumulation

1. Containers
 - a. Unused Paints – Collect in original containers, place in 55-gallon drum.
 - b. Paint Thinner – Collect unusable paint thinner (solvents) in double bunged 55-gallon drum.
 - c. Paint Cleaning Waste – Collect paint cleaning wastes (contaminated paint/thinner) in a double bunged 55-gallon drum.
2. Labels
 - a. Unused Paints – Once placed in the 55-gallon drum, label as “Hazardous Waste” and the type of paint (e.g. lead, epoxy, etc.).
 - b. Paint Thinner – Label container as “Hazardous Waste – Paint Thinner.”
 - c. Paint Cleaning Waste – Label container as “Hazardous Waste – Paint Cleaning Waste.”
3. Storage Area
 - a. Unused Paints – Store in central storage location until pick-up. Paints can be stored a maximum of 90 days from being placed into a 55-gallon drum.
 - b. Paint Thinner – Satellite accumulation in auto shop, up to 55 gallons. When the accumulation exceeds 55 gallons:
 - i. Move to central storage, mark the accumulation date (date filled) and arrange for pick-up within 90 days, OR
 - ii. Arrange for pick-up from satellite storage within 3 days.
 - c. Paint Cleaning Waste – Satellite accumulation in auto shop, up to 55 gallons. When the accumulation exceeds 55 gallons:
 - i. Move to central storage, mark the accumulation date (date filled), and arrange for pick-up within 90 days, OR
 - ii. Arrange for pick-up from satellite storage within 3 days.

Disposal

1. Disposal of paint thinner and paint cleaning waste through ACV as hazardous waste, D001 (ignitable).
2. Disposal of unused paints through ACV as hazardous waste, D001 (ignitable).
3. NOTE: If the paint contains lead or other toxic metals, it may also be classified as D008 (lead), D006 (cadmium) and/or D007 (chromium).

RAGS

Type of Waste

Contaminated rags generated by DRPA operations are to be considered non-hazardous waste and can also be considered flammable, depending on the substance on the rag.

Generation

Contaminated rags typically result from clean-up operations or routine maintenance using solvents or degreasers.

Accumulation

1. Containers
 - a. Place used rags in a 55-gallon closed-top drum.
2. Labels
 - a. Label material as “Non-Hazardous Waste – Contaminated Rags”
 - b. If the substance on the rag is considered flammable, include a standard “Flammable” label next to the Non-Hazardous Waste label. This label can be the same type of label used on the storage cabinets for flammable liquids.
3. Storage Area
 - a. Satellite accumulation in auto shop. No limit on accumulation quantity or time.

Disposal

Disposal of rags through ACV as non-RCRA, non-DOT waste or use of rag recycling vendor.

CLEANING SOLVENTS

Type of Waste

1. Petroleum naphtha-based solvents composed of aliphatic hydrocarbons. Common names include Standard Solvent, Mineral Spirits, Safety-Kleen Solvent Gold - Hazardous
2. Non-halogenated hydrocarbon-based solvents that contain compounds such as toluene, xylene, acetone, methyl isobutyl ketone (MIK) or benzene - Hazardous
3. Brake cleaning fluid - Hazardous

Generation

Cleaning solvent waste is generated when certain cleaning solvents/chemicals are used in conjunction with a parts washer in order to clean various vehicle or mechanical parts. The combination of the cleaning solvent as well as the grease/dirt being cleaned results in this waste.

Accumulation

1. Containers
 - a. Most solvents are used as part of a parts washing or brake cleaning system comprised of delivery, collection, and disposal. Maintain solvent in container attached to parts and brake washer.
2. Labels
 - a. Label container as "Hazardous Waste" and identify contents (e.g. Naphtha).
3. Storage Area
 - a. Satellite accumulation in auto shop, up to 55 gallons. If exceeds 55 gallons:
 - i. Move to central storage, mark accumulation date (date filled), and arrange for pick-up within 90 days, OR
 - ii. Arrange for pick-up from satellite storage within 3 days.

Disposal

1. Disposal of parts washer solvents through ACV as hazardous waste, D039/D040.
2. Disposal of brake cleanings solvents through ACV as hazardous waste, D039.
3. ACV waste pick-ups are typically conducted on a 45-day schedule.

WASTE OIL

Type of Waste

1. Lubricating Oil — Used oil generated from the repair and reconditioning of vehicles and other equipment, including crankcase oil, gearbox oil, transmission fluid, hydraulic oil, and differential oil - Recycled
2. Spilled oil — Liquid recovered from oil spills. See Waste Guidelines for Oil Spill Debris - Recycled

Generation

Accumulation

1. Containers
 - a. Waste oil is collected in large 325-gallon storage tanks.
2. Labels
 - a. Label container as “Recyclable - Waste Oil.”
3. Storage Area
 - a. Satellite accumulation in auto shop, up to 325 gallons. No accumulation time limit.

Disposal

Waste oil is recycled through US Filter / International Petroleum Company (USF/IPC). USF/IPC performs pick-ups upon notification that the tank is near capacity.

USED OIL FILTERS AND FILTER MEDIA

Type of Waste

1. Vehicle oil filters – Non-Hazardous

Generation

Used oil filters are generated when oil filters are replaced on an automobile in conjunction with a regular oil change.

Accumulation

1. Containers
 - a. Crushed oil filters are placed in open top 55-gallon drums.
2. Labels
 - a. Label container as “Non-Hazardous Waste — Used Oil Filters.”
3. Storage Area
 - a. Satellite accumulation in auto shop. No limit on accumulation quantity or time.

Disposal

Disposal of used oil filters through ACV as a non-RCRA, non-DOT waste.

FLOURESCENT BULBS

Types of Waste

1. Spent fluorescent bulbs - Universal

Generation

Spent fluorescent bulbs are generated during routine upkeep and maintenance of DRPA lighting systems.

Accumulation

1. Containers
 - a. Fluorescent bulbs are placed in cardboard shipping containers or the original boxes (unbroken) for pick-up.
2. Labels
 - a. Label boxes as "Universal Waste — Fluorescent Lights."
3. Storage Area
 - a. Satellite accumulation in auto shop or placement in central storage. No accumulation time limit.

Disposal

Disposal of spent fluorescent bulbs through ACV as a Universal, non-DOT waste.

PCB-CONTAINING LIGHT BALLASTS

Types of Waste

1. PCB-containing ballasts – Non-Hazardous
2. Unless the ballast label does not specifically read - "NON PCB CONTAINING" or something similar, you must assume that the ballast contains PCB's. If the ballast label is illegible, consider it to contain PCB's. All (non-leaking) PCB ballasts must be collected for recycle.

Generation

PCB-containing ballasts are generated during routine upkeep and maintenance of DRPA lighting systems.

Accumulation

1. Containers
 - a. Ballasts are placed in 55-gallon drum for pick-up.
2. Labels
 - a. Label drums as "Non-Hazardous Waste — Ballasts."
3. Storage Area
 - a. Satellite accumulation in auto shop or placement in central storage. No accumulation time limit.

Disposal

Disposal of PCB-containing ballasts through ACV as a non-RCRA, non-DOT waste.

MERCURY LAMPS

Types of Waste

1. Mercury lamps - Universal

Generation

Mercury lamps are generated during routine upkeep and maintenance of DRPA lighting systems.

Accumulation

1. Containers
 - a. Mercury lamps are placed in 55-gallon drums for pick-up.
2. Labels
 - a. Label drums as "Universal Waste — Mercury Lamps."
3. Storage Area
 - a. Satellite accumulation in auto shop or placement in central storage. No accumulation time limit.

Disposal

Disposal of spent mercury lamps through ACV as a Universal, non-DOT waste.

PHOTOGRAPHIC CHEMICALS

Type of Waste

1. Photographic developer/reducer (silver solution) used in the print shop at the Benjamin Franklin Bridge – Hazardous
2. Contaminated cotton balls (aliphatic alcohols and hydrocarbons) used in the print shop at the Benjamin Franklin Bridge – Hazardous

Generation

Photographic chemical waste is generated during the printing process for all types of print media such as posters, brochures, pictures, and reports.

Accumulation

1. Containers
 - a. Place photographic developer/reducer in a 30 to 55 gallon drum, closed top. Place contaminated cotton balls in 15 to 30 gallon drum.
2. Labels
 - a. Label containers as “Hazardous Waste — Photographic Developer/Reducer or Contaminated Cotton Balls,” as appropriate.
3. Storage Area
 - a. Satellite accumulation in print shop, up to 55 gallons. If exceeds 55 gallons:
 - i. Move to central storage, mark accumulation date (date filled), and arrange for pick-up within 90 days, OR
 - ii. Arrange for pick-up directly from satellite storage within 3 days.

Disposal

1. Disposal of photographic developer/reducer waste through ACV as hazardous waste, D011.
2. Disposal of contaminated cotton balls through ACV as hazardous waste, D001. ACV waste pick-ups are should be conducted a maximum of 90 days once accumulation has started.

WASTE FUELS (GASOLINE/DIESEL/DEF)

Type of Waste

1. Waste fuels and Diesel Exhaust Fluid (DEF)– Hazardous
2. Spilled fuels mixed with absorbent materials are NOT considered waste fuels.

Generation

Waste fuels are generated from miscellaneous repairs, draining of gas tanks, etc. during routine maintenance of vehicles.

Accumulation

1. Containers
 - a. Place waste fuels in 55 gallon drums.
2. Labels
 - a. Label containers as “Hazardous Waste — Gasoline, Diesel, or DEF” as appropriate.
3. Storage Area
 - a. Satellite accumulation in auto shop, up to 55 gallons. If exceeds 55 gallons:
 - i. Move to central storage, mark accumulation date (date filled) and arrange for pick-up within 90 days, OR
 - ii. Arrange for pick-up from satellite storage within 3 days.

Disposal

Disposal of waste fuels through ACV as hazardous waste, D001/D01 8.

MISCELLANEOUS/UNIQUE WASTES

Type of Waste

DRPA occasionally encounters unidentified waste on or under its bridges, or is provided obsolete chemicals or materials for disposal from other operating groups - Hazardous

Generation

The generation of these miscellaneous wastes is often unknown but can sometimes be traced back to a specific source.

Accumulation

1. Containers
 - a. Unknown wastes are containerized in closed-top, 55 gallon drums.
2. Labels
 - a. Containers are labeled as "Hazardous Waste" and identify contents.
3. Storage Area
 - a. Satellite accumulation in auto shop, up to 55 gallons. If exceeds 55 gallons:
 - i. Move to central storage, mark accumulation date (date filled), and arrange for pick-up within 90 days, OR
 - ii. Arrange for pick-up from satellite storage within 3 days.

Disposal

Disposal of miscellaneous waste through ACV as hazardous waste. DRPA consults with ACV or performs testing to properly characterize the waste for proper disposal.

APPENDIX 1

DRPA PERSONNEL RESPONSIBLE FOR HAZARDOUS WASTE MANAGEMENT

Appendix 1 is given to provide a listing of the current DRPA personnel that are responsible for the implementation and execution of the Hazardous Waste Management Program. ALL DRPA employees that come in contact with hazardous wastes are expected to review and implement the practices set forth within the Hazardous Waste Management Program. It is the responsibility of the following personnel to ensure that all employees are complying with the Program and all applicable regulations.

DRPA Fleet Manager/Environmental Director

Steve Reiners

Fleet Management Director

PO Box 1949 Camden, NJ 08101

(856) 968-3340

Ben Franklin & Betsy Ross Bridge

Joe McAroy

Bridge Director

(856) 317-5906

Commodore Barry & Walt Whitman Bridge

Ricardo DeOliveira

Bridge Director

(215) 218-3721

APPENDIX 2

HAZARDOUS WASTE GENERATOR CATEGORIES AND DOCUMENTATION REQUIRED

REQUIREMENTS	Very Small Quantity Generator (VSQG)	Small Quantity Generator (SQG)	Large Quantity Generator (LQG)
Monthly Generation Limits	<220 lbs. of hazardous waste &/or <2.2 lbs. of acute hazardous waste [262.13]	>220 lbs. but <2200 lbs. of hazardous waste &/or <2.2 lbs. of acute hazardous waste [262.13]	>2200 lbs. of hazardous waste &/or >2.2 lbs. acute hazardous waste [262.13]
Accumulation Quantity Limits	<2200 lbs. of hazardous waste &/or <2.2 lbs. of acute hazardous waste [262.13]	<13,200 lbs. of hazardous waste &/or <2.2 lbs. of acute hazardous waste onsite [262.13]	No Limit [262.13]
Accumulation Time Limits	Unlimited	180 days, or 270 days if shipping a distance greater than 200 miles [262.16]	90 days [262.17]
EPA ID Number Required?	No – Voluntary	Yes – Contact USEPA Region II at (212) 637-3194 [262.18]	Yes – Contact USEPA Region II at (212) 637-3194 [262.18]
Hazardous Waste Manifest Required?	No – Voluntary	Yes [262.20]	Yes [262.20]
Manifest Copy Retention Time	None – Voluntary	3 Years [262.20]	3 Years [262.20]
Exception Reporting (failing to receive a copy of the manifest with TSDf operator signature)	None	None – but within 60 days, the generator must submit a copy of the manifest with a note that the signed TSDf copy is missing [262.42]	(1) The generator must contact the initial transporter of TSDf & NJDEP within 35 days of shipping date. [262.42] (2) The generator must submit a written exception report within 45 days of shipping date to NJDEP. [262.42]
Land Disposal Restriction notification/certification needed to accompany shipments?	None	Required for certain hazardous wastes. Copy should be retained for five (5) years. [268.7]	Required for certain hazardous wastes. Copy should be retained for five (5) years. [268.7]
Biennial Report?	None	None [262.44]	Submitted on each even year to report on manifest activity for previous odd year. [262.41]
Inspections?	None	1) Weekly for hazardous waste storage containers. [265.15] 2) Daily/Weekly for hazardous waste storage tanks. [265.15]	1) Weekly for hazardous waste storage containers. [265.15] 2) Daily/monthly/yearly for hazardous waste storage tanks (log required). [265.15]

Hazardous Waste Training Required?	None	Basic – waste handling familiarization & emergency procedures (no drills required). [265.16]	Full training (no drills required). [265.16]
Preparedness & Prevention Training Needed?	None	Familiarize fire, police, and hospitals with hazards and how to handle situations. Have an emergency response contractor agreement. [265.30-37]	Familiarize fire, police, and hospitals with hazards and how to handle situations. Have an emergency response contractor agreement. [265.30-37]
Contingency Plan Required?	None	Basic Plan – Have the emergency Coordinators name and # as well as the fire department's # located next to a phone. Also have a listing of fire extinguisher, fire alarm, and spill equipment locations. [265.50-56]	Complete Plan [265.50-56]

**Specific regulation section located within 40 CFR are noted in “[]”.

APPENDIX 3
SAMPLE LABELS

HAZARDOUS WASTE

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY
OR THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION.

GENERATOR INFORMATION:

NAME: _____

ADDRESS: _____ PHONE: _____

CITY: _____ STATE: _____ ZIP: _____

EPA STATE MANIFEST

ID NO.: _____ TRACKING NO.: _____

ACCUMULATION EPA WASTE

START DATE: _____ NO.: _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

NON HAZARDOUS WASTE

SOLID WASTE EXCLUDED FROM REGULATION

OPTIONAL INFORMATION

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

CONTENTS _____

NON - HAZARDOUS WASTE

UNIVERSAL WASTE

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

CONTENTS _____

ACCUMULATION START DATE _____

MATERIALS FOR RECYCLE



ORIGINATOR INFORMATION

NAME _____

ADDRESS _____

CITY, STATE, ZIP _____

CONTENTS _____

APPENDIX 4
WEEKLY CONTAINER STORAGE AREA INSPECTION LOG

WEEKLY CONTAINER STORAGE AREA INSPECTION LOG

ITEM/WEEK	WEEK OF ____	WEEK OF ____	WEEK OF ____	WEEK OF ____	WEEK OF ____
Are containers in good condition, not leaking?					
Are containers closed when not in use?					
Are container markings visible/legible?					
Are containers marked with appropriate labels and dates?					
Are containers being stored longer than allowed? (See Appendix 2)					
Are containers segregated according to waste type?					
Are containers of ignitable or reactive waste at least 50' from property line?					
Is there adequate aisle space around containers?					
Is there spill control, safety, communication and fire control equipment present?					
Name, date, and time of person performing inspection					
List any/all corrective action taken					

APPENDIX 5
WASTE PICK-UP LOGS

5-A: HAZARDOUS WASTE PICK-UP TRACKING LOG

5-B: NON-HAZARDOUS WASTE AND RECYCLABLE MATERIALS PICK-UP TRACKING LOG

APPENDIX 6
SAMPLE HAZARDOUS WASTE MANIFEST (EPA FORMS 8700-22 AND 8700-22A)
AND
INSTRUCTIONS FOR COMPLETING A HAZARDOUS WASTE MANIFEST

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number	
5. Generator's Name and Mailing Address			Generator's Site Address (if different than mailing address)			
Generator's Phone:						
6. Transporter 1 Company Name				U.S. EPA ID Number		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address				U.S. EPA ID Number		
Facility's Phone:						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
1.						
2.						
3.						
4.						
14. Special Handling Instructions and Additional Information						
<p>15. GENERATOR'S/OFFEROR'S CERTIFICATION: 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 Acknowledgment 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.</p>						
Generator's/Offoror's Printed/Typed Name			Signature		Month Day Year	
<p>16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____</p> <p>Transporter signature (for exports only): _____</p>						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name			Signature		Month Day Year	
Transporter 2 Printed/Typed Name			Signature		Month Day Year	
18. Discrepancy						
<p>18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection</p> <p style="text-align: right;">Manifest Reference Number: _____</p>						
18b. Alternate Facility (or Generator)				U.S. EPA ID Number		
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)					Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.	2.	3.	4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name			Signature		Month Day Year	

GENERATOR

TRANSPORTER INT'L

DESIGNATED FACILITY

Hazardous Waste Manifest Instructions

What are the instructions for completing the manifest form (EPA Form 8700-22)?

Read all instructions before completing the form.

1. Federal regulations require generators and transporters of hazardous waste and owners or operators of receiving facilities designated on the manifest to complete this form (EPA Form 8700–22) and, if necessary, the continuation sheet (EPA Form 8700–22A) for both inter- and intrastate transportation of hazardous waste.
2. This manifest reflects formatting changes made by U.S. EPA in December 2017. Beginning on June 30, 2018, this manifest (Revision 12-17) must be used and all previous editions are prohibited. Go to www.epa.gov/e-manifest for additional information.
3. This form must be purchased from a registered printer (<https://www.epa.gov/hwgenerators/approved-registered-printers-epas-manifest-registry#how>) and has been designed to be filled out using standard computer printers; a firm point pen may also be used—press down hard. After June 30, 2018, this form can also be completed electronically in EPA’s e-Manifest system.

I. Instructions for Generators

Item 1. Generator’s U.S. EPA Identification Number

Enter the generator’s U.S. EPA twelve-digit identification number, or the state generator identification number if the generator site does not have an EPA identification number.

Item 2. Page 1 of ____

Enter the total number of pages used to complete the manifest (*i.e.*, the first page (EPA Form 8700-22) plus the number of continuation sheets (EPA Form 8700-22A), if any).

Item 3. Emergency Response Phone Number

Enter a phone number for which emergency response information can be obtained in the event of an incident during transportation. The emergency response phone number must:

1. Be the number of the generator or the number of an agency or organization who is capable of and accepts responsibility for providing detailed information about the shipment;
2. Reach a phone that is monitored 24 hours a day at all times the waste is in transportation (including transportation related storage); and

3. Reach someone who is either knowledgeable of the hazardous waste being shipped and has comprehensive emergency response and spill cleanup/incident mitigation information for the material being shipped or has immediate access to a person who has that knowledge and information about the shipment.

Note: Emergency Response phone number information should only be entered in Item 3 when there is one phone number that applies to all the waste materials described in Item 9b. If a situation (e.g., consolidated shipments) arises where more than one Emergency Response phone number applies to the various wastes listed on the manifest, the phone numbers associated with each specific material should be entered after its description in Item 9b.

Item 4. Manifest Tracking Number

This unique tracking number must be pre-printed on the manifest by the forms printer.

Item 5. Generator's Mailing Address, Phone Number and Site Address

Enter the name of the generator, the mailing address to which the completed manifest signed by the designated facility should be mailed, and the generator's telephone number. Note, the telephone number (including area code) should be the normal business number for the generator, or the number where the generator or his authorized agent may be reached to provide instructions in the event the designated and/or alternate (if any) facility rejects some or all of the shipment. Also enter the physical site address from which the shipment originates only if this address is different than the mailing address.

Item 6. Transporter 1 Company Name, and U.S. EPA ID Number

Enter the company name and U.S. EPA ID number of the first transporter who will transport the waste. Vehicle or driver information may not be entered here.

Item 7. Transporter 2 Company Name and U.S. EPA ID Number

If applicable, enter the company name and U.S. EPA ID number of the second transporter who will transport the waste. Vehicle or driver information may not be entered here.

If more than two transporters are needed, use a continuation sheet(s) (EPA Form 8700-22A).

Item 8. Designated Facility Name, Site Address, and U.S. EPA ID Number

Enter the company name and site address of the facility designated to receive the waste listed on the manifest. Also enter the facility's phone number and the U.S. EPA twelve-digit identification number of the facility.

Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number, and Packing Group)

Item 9a. If the wastes identified in Item 9b consist of both hazardous and nonhazardous materials, then identify the hazardous materials by entering an “X” in this Item next to the corresponding hazardous material identified in Item 9b.

Item 9b. Enter the U.S. DOT Proper Shipping Name, Hazard Class or Division, Identification Number (UN/NA) and Packing Group for each waste as identified in 49 CFR 172. Include technical name(s) and reportable quantity references, if applicable.

Note: If additional space is needed for waste descriptions, enter these additional descriptions in Item 27 on the continuation sheet (EPA Form 8700-22A). Also, if more than one Emergency Response phone number applies to the various wastes described in either Item 9b or Item 27, enter applicable Emergency Response phone numbers immediately following the shipping descriptions for those Items.

Item 10. Containers (Number and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

Table I. Types of Containers

BA = Burlap, cloth, paper, or plastic bags.	DT = Dump truck.
CF = Fiber or plastic boxes, cartons, cases.	DW = Wooden drums, barrels, kegs.
CM = Metal boxes, cartons, cases (including roll-offs).	HG = Hopper or gondola cars.
CW = Wooden boxes, cartons, cases.	TC = Tank cars
CY = Cylinders.	TP = Portable tanks.
DF = Fiberboard or plastic drums, barrels, kegs.	TT = Cargo tanks (tank trucks).
DM = Metal drums, barrels, kegs.	

Item 11. Total Quantity

Enter, in designated boxes, the total quantity of waste. Round partial units to the nearest whole unit, and do not enter decimals or fractions. To the extent practical, report quantities using appropriate units of measure that will allow you to report quantities with precision. Waste quantities entered should be based on actual measurements or reasonably accurate estimates of actual quantities shipped. Container capacities are not acceptable as estimates.

Item 12. Units of Measure (Weight/Volume)

Enter, in designated boxes, the appropriate abbreviation from Table II (below) for the unit of measure.

Table II. Units of Measure

G = Gallons (liquids only)	N = Cubic Meters
K = Kilograms	P = Pounds
L = Liters (liquids only)	T = Tons (2000 Pounds)
M = Metric Tons (1000 Kilograms)	Y = Cubic Yards

Note: Tons, Metric Tons, Cubic Meters, and Cubic Yards should only be reported in connection with very large bulk shipments, such as rail cars, tank trucks, or barges.

Item 13. Waste Codes

Enter up to six federal and state waste codes to describe each waste stream identified in Item 9b. State waste codes that are not redundant with federal codes must be entered here, in addition to the federal waste codes which are most representative of the properties of the waste.

Item 14. Special Handling Instructions and Additional Information

1. Generators may enter any special handling or shipment-specific information necessary for the proper management or tracking of the materials under the generator's or other handler's business processes, such as waste profile numbers, container codes, bar codes, or response guide numbers. Generators also may use this space to enter additional descriptive information about their shipped materials, such as chemical names, constituent percentages, physical state, or specific gravity of wastes identified with volume units in Item 12.
2. This space may be used to record limited types of federally required information for which there is no specific space provided on the manifest, including any alternate facility designations; the manifest tracking number of the original manifest for rejected wastes and residues that are re-shipped under a second manifest; and the specification of PCB waste descriptions and PCB out-of-service dates required under 40 CFR 761.207. Generators, however, cannot be required to enter information in this space to meet state regulatory requirements.

Item 15. Generator's/Offeror's Certifications

1. The generator must read, sign, and date the waste minimization certification statement. In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA are also certifying that they have complied with the waste minimization requirements. The Generator's Certification also contains the required attestation that the shipment has been properly prepared and is in proper condition for transportation (the shipper's certification). The content of the shipper's certification statement is as follows: "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 Acknowledgment of Consent." When a party other than the generator prepares the shipment for transportation, this party may also sign the shipper's certification statement as the offeror of the shipment.
2. Generator or Offeror personnel may preprint the words, "On behalf of" in the signature block or may hand write this statement in the signature block prior to signing the generator/offeror certification, to indicate that the individual signs as the employee or agent of the named principal.

Note: All of the above information except the handwritten signature required in Item 15 may be pre-printed.

II. Instructions for International Shipment Block

Item 16. International Shipments

For export shipments, the primary exporter must check the export box, and enter the point of exit (city and state) from the United States. For import shipments, the importer must check the import box and enter the point of entry (city and state) into the United States. For exports, the transporter must sign and date the manifest to indicate the day the shipment left the United States. Transporters of hazardous waste shipments must deliver a copy of the manifest to the U.S. Customs when exporting the waste across U.S. borders.

III. Instructions for Transporters

Item 17. Transporters' Acknowledgments of Receipt

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt. Only one signature per transportation company is required. Signatures are not required to track the movement of wastes in and out of transfer facilities, unless there is a change of custody between transporters.

If applicable, enter the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Note: Transporters carrying imports, who are acting as importers, may have responsibilities to enter information in the International Shipments Block. Transporters carrying exports may also have responsibilities to enter information in the International Shipments Block. See above instructions for Item 16.

This manifest reflects formatting changes made by U.S. EPA in December 2017. Beginning on June 30, 2018, this manifest (Revision 12-17) must be used and all previous editions are prohibited. Go to www.epa.gov/e-manifest for additional information.

IV. Instructions for Owners and Operators of Receiving Facilities Designated On the Manifest

Item 18. Discrepancy

Item 18a. Discrepancy Indication Space

1. The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any discrepancies between the waste described on the manifest and the waste actually received at the facility. Manifest discrepancies are: significant differences (as defined by §§ 264.72(b) and 265.72(b)) between the quantity or type of hazardous waste designated on the manifest or shipping paper, and the quantity and type of hazardous waste a facility actually receives, rejected wastes, which may be a full or partial shipment of hazardous waste that the facility cannot accept, or container residues, which are residues that exceed the quantity limits for "empty" containers set forth in 40 CFR 261.7(b).

2. For rejected loads and residues (40 CFR 264.72(d), (e), and (f), or 40 CFR 265.72(d), (e), or (f)), check the appropriate box if the shipment is a rejected load (*i.e.*, rejected by the designated and/or alternate facility and is sent to an alternate facility or returned to the generator) or a regulated residue that cannot be removed from a container. Enter the reason for the rejection or the inability to remove the residue and a description of the waste. Also, reference the manifest tracking number for any additional manifests being used to track the rejected waste or residue shipment on the original manifest. Indicate the original manifest tracking number in Item 14, the Special Handling Block and Additional Information Block of the additional manifests.
3. Owners or operators of facilities located in unauthorized states (*i.e.*, states in which the U.S. EPA administers the hazardous waste management program) who cannot resolve significant differences in quantity or type within 15 days of receiving the waste must submit to their Regional Administrator a letter with a copy of the manifest at issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72(c) and 265.72(c)).
4. Owners or operators of facilities located in authorized states (*i.e.*, those states that have received authorization from the U.S. EPA to administer the hazardous waste management program) should contact their state agency for information on where to report discrepancies involving “significant differences” to state officials.

Item 18b. Alternate Facility (or Generator) for Receipt of Full Load Rejections

Enter the name, address, phone number, and EPA Identification Number of the Alternate Facility which the rejecting facility has designated, after consulting with the generator, to receive a fully rejected waste shipment. In the event that a fully rejected shipment is being returned to the generator, the rejecting facility may enter the generator’s site information in this space. This field is not to be used to forward partially rejected loads or residue waste shipments.

Item 18c. Alternate Facility (or Generator) Signature

The authorized representative of the alternate facility (or the generator in the event of a returned shipment) must sign and date this field of the form to acknowledge receipt of the fully rejected wastes or residues identified by the initial facility.

Item 19. Hazardous Waste Report Management Method Codes

Enter the most appropriate Hazardous Waste Report Management Method code for each waste listed in Item 9. The Hazardous Waste Report Management Method code is to be entered by the first facility that receives the waste and is the code that best describes the way in which the waste is to be managed when received by the facility.

Item 20. Designated Facility Owner or Operator Certification of Receipt (Except As Noted in Item 18a)

Enter the name of the person receiving the waste on behalf of the owner or operator of the facility. That person must acknowledge receipt or rejection of the waste described on the

manifest by signing and entering the date of receipt or rejection where indicated. Since the Facility Certification acknowledges receipt of the waste except as noted in the Discrepancy Space in Item 18a, the certification should be signed for both waste receipt and waste rejection, with the rejection being noted and described in the space provided in Item 18a. Fully rejected wastes may be forwarded or returned using Item 18b after consultation with the generator. Enter the name of the person accepting the waste on behalf of the owner or operator of the alternate facility or the original generator. That person must acknowledge receipt or rejection of the waste described on the manifest by signing and entering the date they received or rejected the waste in Item 18c. Partially rejected wastes and residues must be re-shipped under a new manifest, to be initiated and signed by the rejecting facility as offeror of the shipment.

Note: The e-Manifest Act mandates several changes to the federal manifest program. Beginning on June 30, 2018:

- This manifest (Revision 12-17) must be used and all previous editions are prohibited.
- Any facility (e.g., a RCRA-permitted facility, Subtitle D facility) that receives a manifest accompanying a state-only regulated waste must comply with 40 CFR 264.71 or 265.71 (use of the manifest) and 40 CFR 264.72 or 265.72 (manifest discrepancies).
- Any facility that receives a paper manifest accompanying a federally regulated waste or state-only regulated waste must submit the top copy (Page 1) of the manifest and any continuation sheets to the U.S. EPA's e-Manifest system within 30 days. The copies must be submitted in an acceptable format. Submissions must be made at the mailing address or electronic mail/submission address specified at the e-Manifest program website's directory of services (see www.epa.gov/e-manifest)
- The facility will be assessed a fee for each manifest copy submitted.
- Go to www.epa.gov/e-manifest for the directory of services and additional information.

What are the instructions for completing the continuation sheet (EPA Form 8700-22A)?

Read all instructions before completing the form.

Federal regulations require generators and transporters of hazardous waste and owners or operators of receiving facilities designated on the manifest to use the uniform hazardous waste manifest (EPA Form 8700-22) and, if necessary, this continuation sheet (EPA Form 8700-22A) for both interstate and intrastate transportation. This form must be used as a continuation sheet to U.S. EPA Form 8700-22 if:

- More than two transporters are to be used to transport the waste; or
- More space is required for the U.S. DOT descriptions and related information in Item 9 of U.S. EPA Form 8700-22.

This continuation sheet reflects formatting changes made by U.S. EPA in December 2017. Beginning on June 30, 2018, this continuation sheet (Revision 12-17) must be used and all previous editions are prohibited. Go to www.epa.gov/e-manifest for additional information.

This form must be purchased from a registered printer (<https://www.epa.gov/hwgenerators/approved-registered-printers-epas-manifest-registry#how>) and has been designed to be filled out using standard computer printers; a firm point pen may also be used—press down hard. After June 30, 2018, this form can also be completed electronically in EPA’s e-Manifest system.

I. Generators

Item 21. Generator’s ID Number

Enter the generator’s U.S. EPA twelve-digit identification number or, the state generator identification number if the generator site does not have an EPA identification number.

Item 22. Page ____

Enter the page number of the continuation sheet.

Item 23. Manifest Tracking Number

Enter the Manifest Tracking Number from Item 4 of the manifest form to which the continuation sheet is attached.

Item 24. Generator’s Name—

Enter the generator’s name as it appears in Item 5 on the first page of the manifest.

Item 25. Transporter—Company Name

If additional transporters are used to transport the waste described on the manifest, enter the company name of each additional transporter in the order in which they will transport the waste. Enter after the word “Transporter” the order of the transporter. For example, Transporter 3 Company Name. Also enter the U.S. EPA twelve-digit identification number of the transporter described in Item 25.

Item 26. Transporter—Company Name

If additional transporters are used to transport the waste described on the manifest, enter the company name of each additional transporter in the order in which they will transport the waste. Enter after the word “Transporter” the order of the transporter. For example, Transporter 4 Company Name. Each continuation sheet can record the names of two additional transporters. Also enter the U.S. EPA twelve-digit identification number of the transporter named in Item 26.

Item 27. U.S. D.O.T. Description Including Proper Shipping Name, Hazardous Class, and ID Number (UN/NA)

For each row enter a sequential number under Item 27b that corresponds to the order of waste codes from one continuation sheet to the next, to reflect the total number of wastes being shipped. Refer to instructions for Item 9 of the manifest for the information to be entered.

Item 28. Containers (No. And Type)

Refer to the instructions for Item 10 of the manifest for information to be entered.

Item 29. Total Quantity

Refer to the instructions for Item 11 of the manifest form.

Item 30. Units of Measure (Weight/Volume)

Refer to the instructions for Item 12 of the manifest form.

Item 31. Waste Codes

Refer to the instructions for Item 13 of the manifest form.

Item 32. Special Handling Instructions and Additional Information

Refer to the instructions for Item 14 of the manifest form.

II. Transporters

Item 33. Transporter—Acknowledgment of Receipt of Materials

Enter the same number of the Transporter as identified in Item 25. Enter also the name of the person accepting the waste on behalf of the Transporter (Company Name) identified in Item 25. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 34. Transporter—Acknowledgment of Receipt of Materials

Enter the same number of the Transporter as identified in Item 26. Enter also the name of the person accepting the waste on behalf of the Transporter (Company Name) identified in Item 26. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

III. Owner and Operators of Treatment, Storage, or Disposal Facilities

Item 35. Discrepancy Indication Space

Refer to Item 18. This space may be used to more fully describe information on discrepancies identified in Item 18a of the manifest form.

Item 36. Hazardous Waste Report Management Method Codes

For each field in Item 36, enter the sequential number that corresponds to the waste materials described under Item 27, and enter the appropriate process code that describes how the materials will be processed when received. If additional continuation sheets are attached, continue numbering the waste materials and process code fields sequentially, and enter on each sheet the process codes corresponding to the waste materials identified on that sheet.

APPENDIX 7
HAZARDOUS WASTE MANIFEST TRACKING LOGS

APPENDIX 8
BRIDGE FACILITIES DIAGRAMS

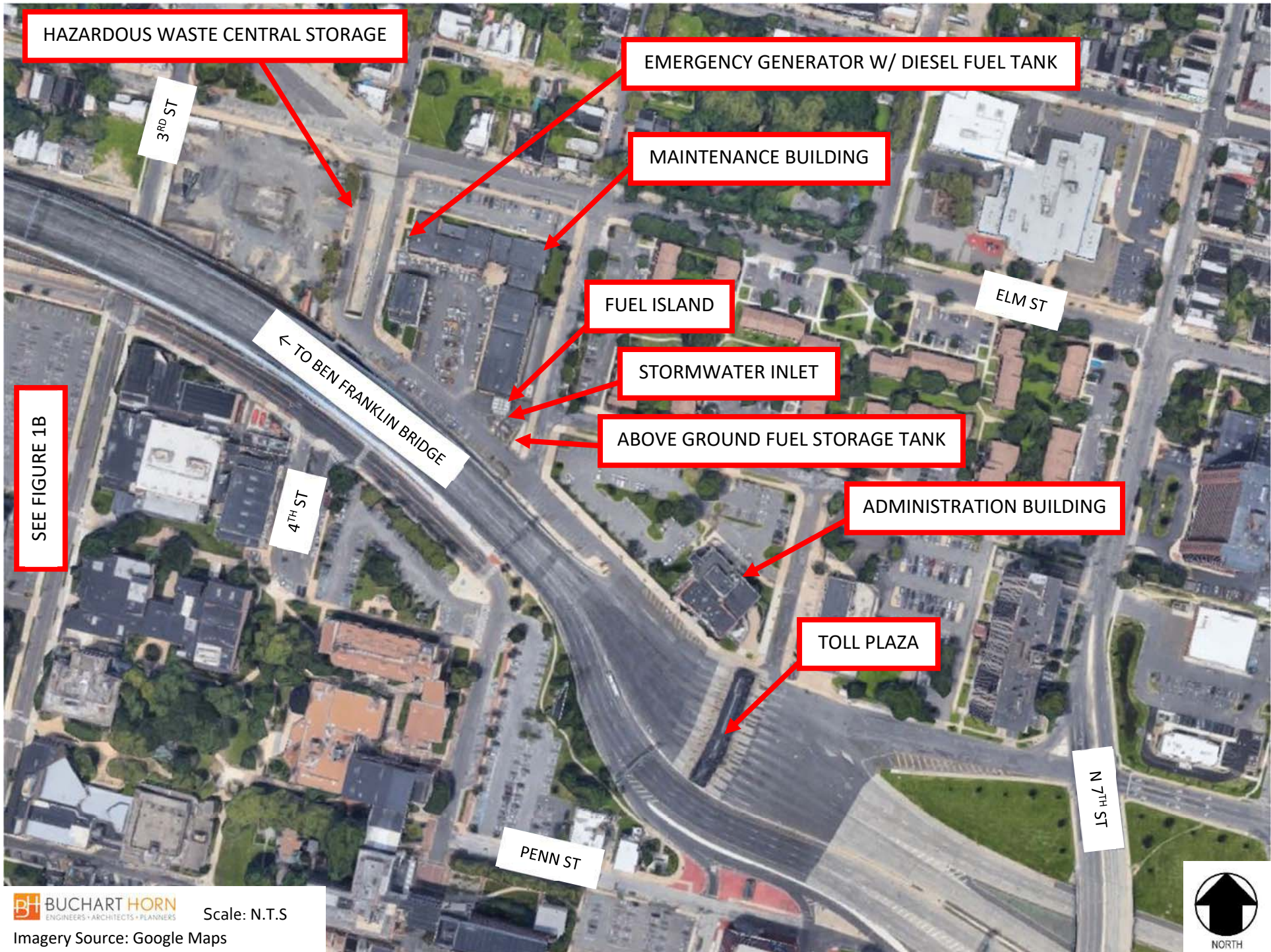


FIGURE 1A – BENJAMIN FRANKLIN BRIDGE FACILITIES DIAGRAM

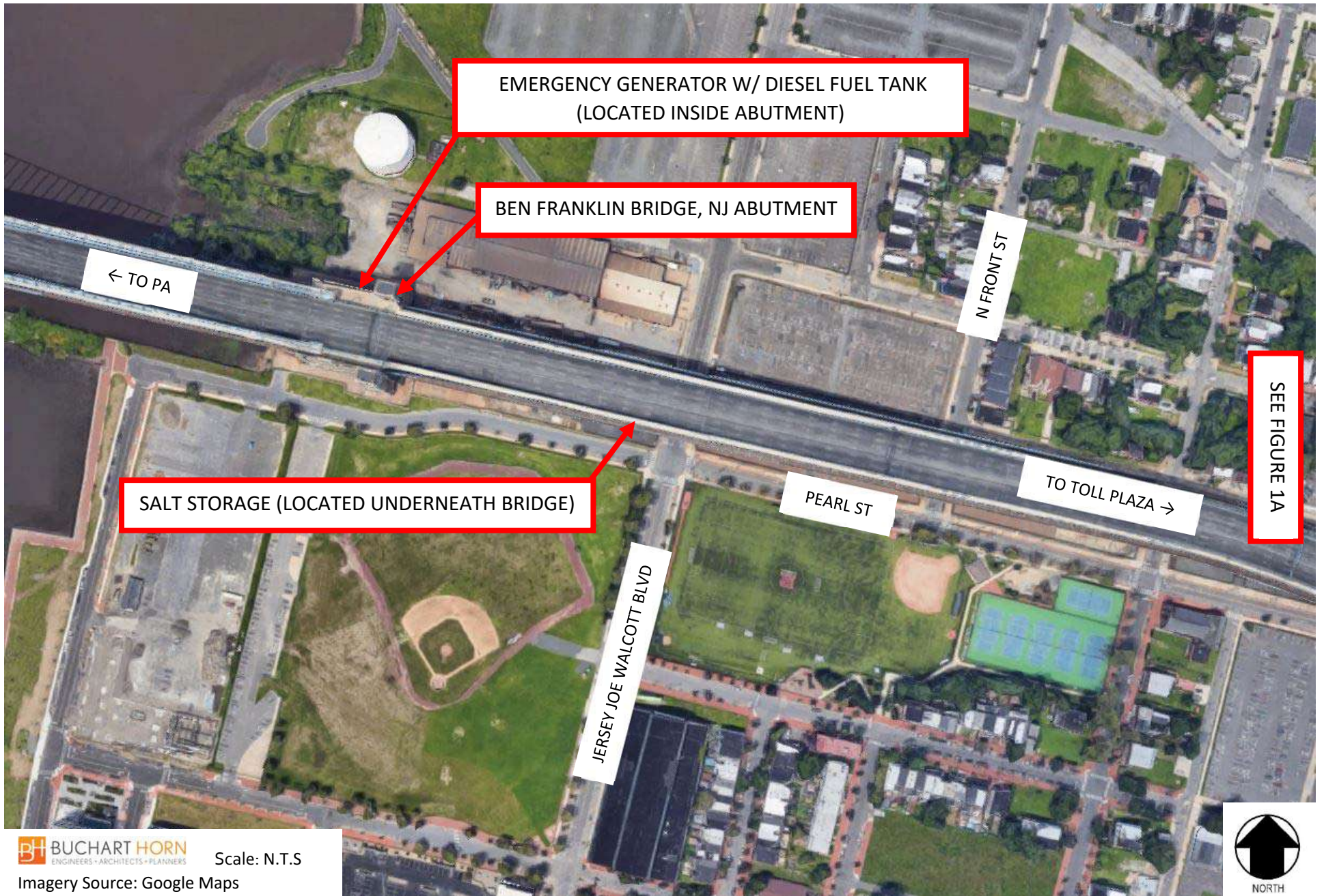


FIGURE 1B – BENJAMIN FRANKLIN BRIDGE ABUTMENT DIAGRAM



FIGURE 2 – BETSY ROSS BRIDGE FACILITIES DIAGRAM

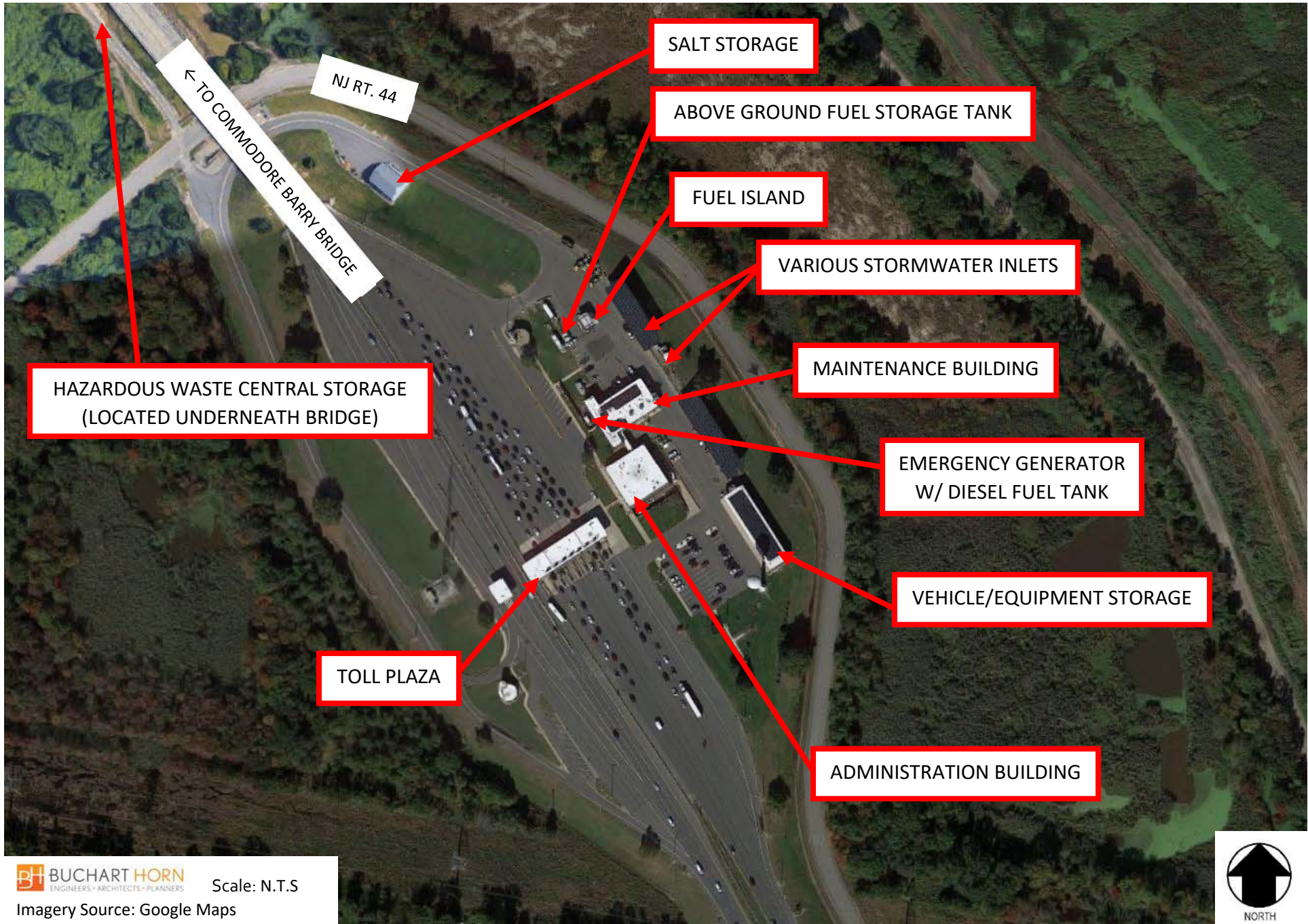


FIGURE 3 – COMMODORE BARRY BRIDGE FACILITIES DIAGRAM



FIGURE 4 – WALT WHITMAN BRIDGE FACILITIES DIAGRAM



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