



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



November, 2000

To: Facility Owner/Operator
Large Quantity Generators
Small Quantity Generators

RE: Connecticut General Statute (CGS) Section 22a-454 Waste Facility Manifest Requirements

The Department of Environmental Protection (DEP) is aware that there has been some confusion regarding the use of the Uniform Hazardous Waste Manifest for non-RCRA hazardous waste otherwise known as "Connecticut Regulated Waste". This letter is intended to clarify DEP's position regarding the use of the manifest for non-RCRA hazardous waste including waste referred to as Connecticut Regulated Wastes (CRO1 - CRO5).

With the exception of regulated PCB wastes (CFR 761.207 - 761.215) including CRO1 wastes, DEP does not require generators or transporters of non-RCRA hazardous wastes to use a manifest. Many of the facilities receiving these wastes, however, have record keeping conditions in their permits which require the permittee to use a manifest for all wastes received at the facility. While the permit requirements to retain copies of manifests on-site remain unchanged, **copies of manifests for CRO2-CRO5 wastes should not be submitted to DEP.** This letter, of course, does not alter the manifest requirements for RCRA hazardous waste subject to regulation under the Connecticut Hazardous Waste Management Regulations (22a-449(c)-100 through 110).

Eliminating the unnecessary submission of non-RCRA hazardous waste manifests to DEP will streamline the manifest process saving time and money for both DEP and industry. Your assistance in relaying this information to your customers who generate non-RCRA hazardous waste would be greatly appreciated.

Should you have any questions regarding this issue, please feel free to contact Paul Franson at (860) 424-3565.

Sincerely,

Richard J. Barlow, Chief
Bureau of Waste Management

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