

## Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement

### Disclaimer

The Department of Toxic Substances Control (DTSC) takes every precaution to ensure the accuracy of data in the Hazardous Waste Tracking System (HWTS). However, because of inaccuracies in the submitted data, limitations of the hazardous waste manifest system, and the technical limitations of the database, DTSC cannot guarantee that the data accurately reflects what was actually transported or produced.

### Data Limitations

Listed below are details regarding the data available on the HWTS, its limitations, and the reasons for those limits. This information should be read carefully by all users of the HWTS reports. The HWTS is accessible to DTSC staff, Certified Unified Program Agencies (CUPAs), and other State and federal agencies by request. Ten reports are available to the general public by internet access. However, only individuals with authorized access can view the manifest images through the online application. The public can obtain a limited number of photocopies of manifest images by contacting [MCR@dtsc.ca.gov](mailto:MCR@dtsc.ca.gov). Manifest images and microfilm prints are true images and may be used as documentary evidence. Other HWTS reports should be used with caution given the limitations described in this Disclaimer and Data Limitations Statement. Anyone using the HWTS reports for evidentiary purposes should validate the accuracy of the data contained in the HWTS reports by comparing them to manifest images or microfilm prints. As mentioned above, DTSC does not guarantee that the HWTS reports accurately reflects what was actually transported or produced. To ensure that all users of the HWTS reports are aware of the limitations of the reports, the Disclaimer and Data Limitations Statement should accompany all reports distributed to all users of the HWTS.

### Document, Data, Microfilm, and Electronic Image

#### Availability 1973 to 1980

Documents during this time frame were called Liquid Waste Hauler Reports. Information from these documents was not captured in a data system and they were stored on microfilm sorted by year and by the generator's name. Starting in 1979 - 1980, treatment, storage, and disposal facilities' (TSDF) information was also stored. The method of storage makes it difficult to find information on specific generators, transporters or TSDFs.

## *Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

### **1983 to 1992**

The Uniform Hazardous Waste Manifest (DHS 8022) was created by the Department of Health Services (DHS) in 1980 with the first manifests being collected in 1983. The form was used by generators to transport hazardous waste. The Hazardous Materials Management Section was responsible in collecting information from these documents to be keyed into a data system and the documents were microfilmed. In November 1984, the Uniform Hazardous Waste Manifest became DHS 8022A and EPA Form 8700-22. After microfilming, hard copy documents were destroyed. This information is stored in a separate data storage structure that is available to certain staff.

### **1993 to 1996**

Information from manifests was captured into the newer data system and the documents were microfilmed. After microfilming, the hard copy documents were destroyed. Manifest Continuation Sheet (EPA Form 8700-22A) was created in March 1984. The information was not collected or microfilmed. Manifest continuation sheets are stored in hard copy form at the State Records Center sorted by year and alphabetically by generator name. Non-California manifests and continuation sheet information was not collected. Hard copy records are stored at the State Records Center sorted by year and by generator. DTSC began receiving manifest correction letters and these were stored in hard copy form sorted by year and alphabetically by generator name in the GISS Office. The method of storage makes it difficult to find information from California manifest continuation sheets, non-California manifests, and non-California continuation sheets for this time frame.

### **1997 to 1998**

Information from manifests, manifest continuation sheets, non-California manifests, and non-California continuation sheets was captured into the data system and the documents were microfilmed and electronically imaged. DTSC continued to store manifest correction letters in hard copy form in the GISS Office.

### **1999 to 2001**

Information from manifests, manifest continuation sheets, non-California manifests, and non-California continuation sheets was captured into the data system and the documents were microfilmed and electronically imaged. Starting in 2001 information from manifest correction letters was collected, microfilmed, electronically imaged and link to manifest data.

### **2002 to September 4, 2006**

Two systems are used from 1983 to 1992 and 1993 to present. Information from

## *Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

Manifests, Continuation sheets, non-California manifests, and non-California continuation sheets was captured into the data system and the documents were microfilmed and electronically imaged. Information from manifest correction letters was collected to link the corrections to the manifest data and they were microfilmed and electronically imaged. After microfilming, the hard copy documents were destroyed. Problems with the continuation sheet and non-California manifest data loading processes delayed loading this information.

### **September 5, 2006 to June 29, 2018**

New forms are sold by private printers registered by the United States Environmental Protection Agency (U.S. EPA). As those printers are registered, they will be listed in the Manifest Registry. Old manifests printed by California or other states cannot be used on or after this date.

### **June 30, 2018 to present**

The U.S. EPA established a national system for tracking hazardous waste shipments electronically known as the Hazardous Waste Electronic Manifest (e-Manifest) System launched on June 30, 2018. Handlers are strongly encouraged by the U.S. EPA to use the e-Manifest System as this will be the least expensive and easiest way to comply with the regulations. The existing 6-copy uniform hazardous waste manifest form is replaced with a new 5-copy form. New manifest forms are sold by U.S. EPA approved registered printers listed in the [Manifest Registry](#). U.S. EPA will accept Page 1 copies of the obsolete 6-copy forms for processing after June 30, 2018, however they strongly recommend that users transition to the 5-copy form as quickly as possible. If a user would like to continue to use the obsolete 6-copy form, they should undertake measures to minimize confusion. For example, one approach (although not a requirement) could include applying a pre-printed adhesive label to the top copy with the accurate copy distribution language, “designated facility to EPA’s e-Manifest system”. The information in the HWTS is updated nightly as connection to the e-Manifest System is available.

## **Additional Information:**

### **California Manifests (California Code of Regulation Chapter 12 Appendix 1, Section 662626.70):**

The data in the HWTS reports are available from January 1, 1993 to September 4, 2006. Electronic manifest images from the HWTS are available to DTSC employees for most manifests with shipment dates of January 1, 1997 forward. DTSC has microfilmed the manifests as follows: Most manifests for the time period 1983 to June 29, 2018 were microfilmed; For the fiscal year 1994 to 95 (July 1st, 1994 through June

## *Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

30th, 1995), only the TSDf copies of the manifests were microfilmed and key data entered. The Generator copies of manifests were not microfilmed but data was key in due to budget constraints. The generator copies were stored in hard copy at DTSC until 2002. In early 2001 enough funding existed to ensure all generator copies were microfilmed and enough information was collected from the generator copies to determine which manifests were not in the data system. These generator manifests were processed to capture the waste information and the information was loaded into the data system.

### **Continuation Sheet Data (California Code of Regulation Title 22 Section 662626.20):**

Waste stream data from continuation sheets are available on the HWTS for manifests received by DTSC since July 1st, 1997.

### **Non-California Manifests: (Accepted before September 4th, 2006)**

Data from non-California manifests used for shipping wastes out of California are available on the HWTS, for non-California manifests received since July 1st, 1997 to September 4th, 2006. Previously, DTSC did not capture data from, or microfilm, non-California manifests. Information from non-California manifests is currently unavailable with routine reports.

### **Correction Letters (California Health Safety Code 25160.5):**

Correction letters were not routinely required by DTSC until mid-1998. From late 2002, GISS began entering corrected data into the data system from correction letters.

Corrections are indicated by version numbers on manifest detail reports. Companies can correct information from all manifests with a generator date of June 29, 2018 and prior by submitting a manifest correction letter to DTSC. Manifests with a generator date on or after June 30, 2018 (date e-Manifest launched) can be corrected by the receiving or designated facility listed on box 8 of the respective manifest. The generator should contact their receiving facility immediately after learning of any incorrect information on any of their manifests.

### **Locating Manifest:**

Document retrieval information is added to tie the microfilm and electronic images to manifest data using the unique roll and frame numbers of the microfilmed manifest documents from 1980 – June 29, 2018.

## Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement

### Data Limitations

#### **Timeliness of Data:**

From 1980 – June 29, 2018, it generally took about three months for manifest data to be posted in the HWTS. This includes up to 30 days submittal time allowed to companies from date of shipment and DTSC's processing time. DTSC has also added preload checks to the data acceptance process to improve data quality. Manifests failing these checks will be referred for manual resolution. This process will result in additional delays for a small percentage of the data. In mid-May 2020, the manifest data from the e-Manifest System was integrated into the HWTS, which includes manifest data after June 30, 2018 through May 2020. After this date in May, nightly uploads are done from the U.S. EPA as availability is permitted.

#### **Incorrect Handler Reference Data:**

Before June 29, 2018, the data in the HWTS was tracked by the U.S. EPA (federal) Identification (ID) number or the California ID number. The federal EPA ID number and California State ID number are issued by DTSC's GISS. The U.S. EPA has given DTSC authorization to issue EPA ID numbers on their behalf for California generators that meet the criteria under federal regulations. Upon issuance of the California ID, all company-specific information such as name and address are key data entered into the HWTS and linked to the ID number. For entities with a federal ID, this information is entered periodically, upon receipt of updates from the U.S. EPA. Therefore, there is a delay in adding information related to new or modified U.S. EPA ID numbers. Company specific information (except ID), is *not* verified during manifest key data entry. In cases where the ID number and/or the company specific information is/are incorrect, the desired data may be unavailable.

#### **Selected Data Elements:**

##### From the Manifest:

Items with (\*) have been captured since January 1st, 2004 to September 4th, 2006:

- Manifest Number (box A)
- Generator ID Number (box 1)
- Generator Name (box 3) \*
- Generator Phone (box 4) \*
- First Transporter ID Number (box 6)
- First Transporter Name (box 5) \*
- First Transporter Phone (box D) \*
- Second Transporter ID Number (box 8)
- Second Transporter Name (box 7) \*

*Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

- Second Transporter Phone (box F) \*
- Designated TSDF ID Number (box 10)
- Facility ID Number (TSDF copy only) (box G)
- Facility Phone (box H) \*
- For items in boxes 11, 12, 13, 14, I, and K, the following information is captured for each filled in waste stream:
  - UN Number (box 11) \*
  - Hazard Class (box 11) \*
  - Packing Group (box 11) \*
  - Container Type (box 12)
  - Number of Containers (box 12)
  - Waste Quantity (box 13)
  - Unit of Measure (box 14)
  - Resource Conservation and Recovery Act (RCRA) Waste Code (box I)

**FIRST WASTE CODE LIST ONLY**

- California Waste Code (box I)
- Handling Code (TSDF copy only) (box K)
- Country of export when an export manifest (box 15) \*
- Generator Signature present (box 16) \*
- Generator Signature Date (box 16) \*
- Transporter 1 Signature present (box 17) \*
- Transporter 1 Signature date (box 17), the Ship Date
- Transporter 2 Signature present (box 18) \*
- Transporter 2 Signature date (box 18) \*
- TSDF Signature present (box 20) \*
- Receipt Date (TSDF copy only) (box 20)
- Manifest Copy Type (G for Generator and D for TSDF)
- Whether a Discrepancy was Noted in Box 19 of the Manifest
- The following elements are captured from the manifest documents. Since September 5, 2006 – June 29, 2018.
  - Manifest Number (box 4)
  - Generator ID Number (box 1)
  - Generator Name, Mailing and Site Address (box 5)
  - Generator Phone (box 3)
  - First Transporter Name and ID Number (box 6)
  - Second Transporter Name and ID Number (box 7)
  - Designated TSDF Name, site address and ID Number, (box 8)

*Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

- For items in boxes 9a, 9b, 10, 11, 12 and 13, the following information is captured for each filled in waste stream:
  - HM(9a)
  - UN Number (box 9b)
  - Hazard Class (box 9b)
  - Packing Group (box 9b)
  - Container Type (box 10)
  - Number of Containers (box 10)
  - Waste Quantity (box 11)
  - Unit of Measure (box 12)
  - Resource Conservation and Recovery Act (RCRA) Waste Code (box 13, list up to 5 RCRA codes)
  - California Waste Code (box 13, Only list 1 of this code)
  
- Country of export when exports manifest (box16)
- Generator Signature present (box 15)
- Generator Signature Date (box 15)
- Transporter 1 Signature present (box 17)
- Transporter 1 Signature date (box 17), the Ship Date
- Transporter 2 Signature present (box 17)
- Transporter 2 Signature date (box 17)
- Discrepancy Indication Space (18a)
- Handling Code (TSDf copy only, box 19(1), 19(2), 19 (3), 19(d))
- TSDf Signature present (box 20)
- Receipt Date (TSDf copy only) (box 20)
- Manifest Copy Type (G for Generator and D for TSDf)

Manifest Continuation Sheet:

The following elements are captured from manifest continuation sheets. Items with \* have been captured since January 1st, 2004 to September 4th, 2006:

- Manifest Document Number (box L)
- Generator EPA ID (box 21)
- Generator Name (box 22) \*
- Transporter Three Name (box 24) \*
- Transporter Three ID Number (box 25)
- Transporter Four Name (box 26) \*
- Transporter Four ID Number (box 27)
- For items in boxes 28, 29, 30, 31, H, and T, the following information is

*Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

captured for each filled in waste stream:

- UN Number (box 28) \*
- Hazard Class (box 28) \*
- Packing Group (box 28) \*
- Container Type (box 29)
- Number of Containers (box 29)
- Waste Quantity (box 30)
- Unit of Measure (box 31)
- Resource Conservation and Recovery Act (RCRA) Waste Code (box H)

**FIRST WASTE CODE LIST ONLY**

- California Waste Code (box H)
- Handling Code (TSDf copy only-box T)
- Transporter Three Signature present (box 33) \*
- Transporter Three Date (box 33)
- Transporter Four Signature present (box 34) \*
- Transporter Three Date (box 34)
- It is also flagged if a discrepancy is noted in box 35 of the manifest continuation sheet.
- Manifest Continuation Copy Type (G for Generator and D for TSDf)

The following elements are captured from the manifest documents. Since September 5, 2006 to June 29, 2018:

- Manifest Document Number (box 23)
- Page (box 22)
- Generator EPA ID (box 21)
- Generator Name (box 24)
- Transporter Name and EPA ID (box 25 used for 3, 5 or 7th transporter)
- Transporter Name and EPA ID (box 26 used for 4, 6 or 8th transporter)
- HM (box 27a)
- For items in boxes 27b, 28, 29, 30, 31, H, and T, the following information is captured for each filled in waste stream:
  - UN Number (box 27b)
  - Hazard Class (box 27b)
  - Packing Group (box 27b)
  - Container Type (box 28)
  - Number of Containers (box 28)
  - Waste Quantity (box 29)
  - Unit of Measure (box 30)



### *Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

- Resource Conservation and Recovery Act (RCRA) Waste Code (box 31, list up to 5 RCRA codes)
- California Waste Code (box 31, Only list 1 of this code)
- Handling Code (TSDf copy only) (box 36)
- Transporter Three Signature present (box 33)
- Transporter Three Date (box 33)
- Transporter Four Signature present (box 34)
- Transporter Three Date (box 34)
- It is also flagged if a discrepancy is noted in box 35 of the manifest continuation sheet.
- Manifest Continuation Copy Type (G for Generator and D for TSDf)

#### **Paired:**

A manifest consists of six copies. DTSC normally receives two of these copies. The Generator is required to send a Generator copy (G) to DTSC within 30 days of the shipment date and the TSDf is required to submit a TSDf copy (D) within 30 days of receipt of the shipment. The HWTS considers manifests as paired when DTSC receives both G and D copies of a manifest, with an identical manifest number and the same generator signature date.

#### **Matched:**

Manifests are considered as matched when the information on both the G and D copies in the following areas is identical: generator ID Number, manifest number, transporter 1 ID Number, transporter 2 ID Number (if present), TSDf ID Number, UN Number, Hazard Class, Packing Group, Number of Containers, Container Type, Total Quantity, Unit Wt/Volume, Waste Code(s), generator signature date, transporter 1 signature date, and TSDf signature date.

#### **How Corrections Are Handled:**

The HWTS data records appear as originally submitted and key data entered, except those that are modified through the correction process. Manifests submitted with incorrect or blank entries result in loss of data or erroneous data in reports. Typical errors include blank dates, incorrect waste codes, and incorrect ID numbers. Prior to July 1, 2002 the system did not allow for correction of inaccurate data. Since then, records have been corrected as Correction Letters have been received. Corrections may be retroactive back to 1993. Correction letters received from July 1, 2002 forward create new versions of the existing manifest records and the HWTS reports display the most recent version. From January 1, 1996, DTSC added a notation to manifest records with correction letters, along with the microfilm roll and frame number of the letter.

## *Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

Additionally, images of correction letters received from January 1, 1997 forward, have been electronically imaged. Images are linked to the original manifest and are available through the reports.

### **Duplicate Manifests:**

Manifests with duplicate manifest numbers exist in the manifest tracking system. To assure that each manifest is identified as a unique manifest, the HWTS performs a comparative analysis on each manifest to assess its uniqueness. There are known blocks of manifest numbers that were duplicated as follows: 93000000 to 93199999 and 96600001 to 96900000.

### **Incomplete Waste Code Data:**

The first State waste code and the first federal waste code for each waste stream (each line within box 11 of the manifest) are entered in the database, regardless of importance. No other codes are tracked, although they may appear on the manifest. No attempt is made to determine the more appropriate code if more than one appears.

### **Handling of Invalid Data:**

#### Invalid Waste Codes:

From 1993 to 2001, waste codes that did not match system lists were replaced with “\*\*\*\*” for California waste codes, and “\*\*\*\*\*” for RCRA waste codes. Invalid information may have been entered by the Generator or a key data entry error. From 2002 on, waste codes have been captured as reported.

#### Blank or Invalid Dates:

From 1983 to 2001, the mainframe computer Haznet) flagged manifest records with blank dates or invalid dates and automatically inserted dates as follows:

- G Copy: Blank/invalid shipping date, Date manifest processed (batch date).  
D Copy: Blank/Invalid shipping date, Date manifest received by TSDF.
- D Copy: Blank/Invalid TSDF receipt date-Date manifest processed (batch date).  
From 1996 forward, all manifest data with blank/invalid dates downloaded from the mainframe into the Intranet Haznet, were loaded with dates set to zero.

Therefore, Intranet reports from 1996 to 2001 displayed zero-year summaries. However, the HWTS does not permit blank/invalid dates to be recorded. When the historical data was downloaded from the mainframe into the HWTS, the inserted dates from the mainframe were downloaded as well, replacing the zero- year dates.

## *Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

With the implementation of the HWTS in 2002, dates with a proper format, but in the future, are captured from the manifest as reported. This can lead to displays that show future dates available for selection. As resources are available, these future dates will be targeted for corrective action.

### Handling Method Codes:

Invalid handling method codes (from box K) are replaced with “\*\*\*”.

### **System Calculations:**

#### Quantity Conversions:

All quantities are converted to tons for reports and calculations. Cubic yards are converted using a density estimate for soil. Liquid measurements are converted using a density equal to water. These conversion factors may underestimate or overestimate the actual weight of the waste. The following conversion factors are used by DTSC:

- 1 Gallon (G) = 0.00417 ton
- 1 Kilogram (K) = 0.001102 ton
- 1 Liter (L) = 0.001102 ton
- 1 Cubic Meter (M) = 1.102 tons
- 1 Metric Ton (N) = 1.102 tons
- 1 Pound = 0.0005 ton
- 1 Ton (T) = 1.0 ton
- 1 Cubic Yard (Y) = 0.8428 ton

Except for the following State Waste Codes:

- G – 134 – Aqueous Solutions <10% org – .0042  
G – 135 – Unspecified Aqueous – 0.0042
- G – 212 – Acetone – 0.0033
- G – 214 – Xylene, Toluol. Terpentine – .0036  
G – 221 – Automotive Oil – 0.0038
- G – 331 – Alcohols – 0.0033
- G – 343 – Jet Fuel (Kerosene), diesel – .0034  
Y – 611 – Contaminated Soil – 1.41
- Y – 151 – Asbestos – 0.23

#### Use of Alternative TSDF:

Some reports display counts for both the TSDF and the Alternate TSDF. These should

## *Appendix C: Hazardous Waste Tracking System Disclaimer & Data Limitations Statement*

not be added together. If the user of a report adds these two columns together, the resulting sum may inappropriately double count tonnage as most Alternate TSDFs and Primary TSDFs are actually the same facility.

### Large Tonnage Error:

Prior to May 1st, 2002, reported or converted quantities that exceeded 100 tons for a single manifest, were not processed but instead flagged as errors, with the tons set to zero. Some rail shipments exceeding this weight limit could have been erroneously misreported as zero tonnage shipments. After May 1st, 2002, actual data was input into the data system. In instances where single waste stream tonnage exceeds 130 tons, GISS staff intervenes manually and correct the information.

### Invalid Units of Measure:

Prior to May 1st, 2002, invalid units of measure or invalid measures were flagged as errors, with tonnage set to zero. The new system includes a currently inactive rule that when activated will run a validation check to identify invalid measures and will automatically send correction notices to Generators.

### **Reduced Manifest Requirements:**

Health and Safety Code (HSC) section 25160.2 allows certain types and quantities of hazardous wastes to be manifested under the consolidated manifesting procedure, formerly known as “milk run” or modified manifesting. Under this procedure, consolidated transporters are listed as the generators on the manifest rather than those businesses that actually generated the wastes. Consolidated transporters are required to submit quarterly to DTSC detailed information, called Transporter Quarterly Report (TQR), about those generators that participated under the consolidated manifesting procedure. The HWTS is planned to be expanded to include TQRs in the future.

When the generator or generator of record, transporter and TSDF are the same company, the generator copy of the manifest is not required to be submitted to DTSC [HSC section 25160(b)(5)(A)]. This results in legitimate unpaired D copies of manifests, in data, microfilm, and electronic image.

### **Additional Information:**

The HWTS includes a system for users to report problems. The address is: [hwtsadm@dtsc.ca.gov](mailto:hwtsadm@dtsc.ca.gov).