

July 31, 2002

**California Environmental Protection Agency
Department of Toxic Substances Control**

**Disclaimer & Data Limitations Statement
For use by General Public**

DISCLAIMER

The Department of Toxic Substances Control (DTSC) takes every precaution to assure the accuracy of data in the Hazardous Waste Tracking System (HWTS). However, because of the large number of manifests handled, inaccuracies in the submitted data, limitations of the manifest system and the technical limitations of the database, DTSC cannot guarantee that the data accurately reflect 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 limitations. This information should be read carefully by all users of HWTS reports. The HWTS is accessible to DTSC staff, Certified Unified Program Agencies (CUPAs), other State agencies, federal agencies, and the general public. However, only individuals with authorized access can view the manifest images. The public can obtain photocopies of those images by contacting DTSC's Generator Information Services Section (GISS). 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 Statement and Data Limitations Statement. Any person using 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 warrant the accuracy of HWTS reports. To assure that all users of the HWTS reports are aware of the limitations of the reports, the Disclaimer Statement should accompany all reports distributed to the general public from the HWTS.

DATA AND IMAGE AVAILABILITY

- 1. California Manifests:** The data on the HWTS are available from January 1, 1993 forward.
- 2. Non-California Manifests:** Data from California manifests used for shipping wastes out-of-state are available on HWTS. Data from non-California manifests used for

shipping wastes into California are also available on the HWTS, for non-California manifests received after July 1, 1997. DTSC previously did not capture data from, or microfilm non-California manifests. Hard copies of out-of-state manifest documents are filed alphabetically by State, year and generator. The documents are stored at the State Records Center. However, information from non-California manifests are not currently included in routine reports.

3. Continuation Sheet Data: Data from continuation sheets are available on HWTS for manifests received by DTSC since July 1, 1997. Earlier data were not entered in the database or microfilmed. Hard copies of these documents are filed alphabetically by State, year, and generator. The documents are stored at the State Records Center. Information from California manifest continuation sheets are included in routine HWTS reports.

LIMITATIONS

1. Timeliness of Data: It generally takes about three months for manifest data to be posted in the HWTS. This includes the 30 days submittal time allowed to companies and DTSC's processing time. As electronic manifesting is implemented, the submittal time period for the electronically submitted manifests may be reduced to one or two weeks, resulting in speedier postings. DTSC is also adding validations to the data acceptance process to improve data quality. Manifests failing validation will be referred to a GISS work que for resolution. This validation process may result in additional delays.

2. Incorrect Handler Reference Data: The data in the HWTS are tracked by the United States Environmental Protection Agency (U.S. EPA) Identification Number (ID) or the California ID. The federal ID is issued by U.S. EPA and the California ID by DTSC's GISS. 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 key data 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 key data entered or verified during manifest key data entry. In cases where the ID number and/or the company specific information is incorrect, the desired data may be unavailable.

3. Selected Data Elements:

a. From Manifest: The following elements from the manifest are entered into HWT:

- Manifest Number;
- Generator ID Number (box 1);
- First Transporter ID Number (box 6);

- Second Transporter ID Number (box 8);
- Designated TSDf ID Number (box 10);
- Facility ID Number (TSDf copy only) (box G);
- Ship Date (the date the first transporter signs the manifest)(box 17);
- Receipt Date (TSDf copy only)(box 20);
- California Waste Code (box I);
- Resource Conservation and Recovery Act (RCRA) Waste Code (box I);
- Handling Code (TSDf copy only-box K);
- Container Type (box 12);
- Number of Containers (box 12);
- Waste Quantity (box 13);
- Unit of Measure (box 14);
- Manifest Copy Type (G for generator and D for TSDf);
- Whether a Discrepancy was Noted in Box 19 of the Manifest.

b. From Continuation Sheet: The following data elements from manifest continuation sheets are entered into the HWTS:

- Manifest Document Number (box L);
- Generator EPA ID (box 21);
- California Waste Code (box R);
- RCRA Waste Code (box R);
- Handling Code (TSDf copy only-box T);
- Container Type (box 29);
- Number of Containers (box 29);
- Waste Quantity (box 30);
- Unit of Measure (box 31);
- Manifest Copy Type (G for generator and D for TSDf);
- EPA ID Numbers for Transporter Three and Four (box 25 and 27);
- Transporter Three and Four Dates (box 33 and 34);
- It is also flagged if a discrepancy is noted in box 35 of the manifest continuation sheet.

c. Tracking and Calculations: Document retrieval information is added, with microfilm roll and frame number, and converted tonnage is calculated. Please refer to item nine below for system calculation details.

4. How Corrections are Handled: HWTS data records appear as originally submitted and key data entered, except those that are modified after July 1, 2002. Prior to this date, the system did not allow for correction of inaccurate data.

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. Some companies have provided DTSC with documentation summarizing

corrections (correction letters) related to submitted manifests. However, correction letters received prior to July 1, 2002, did not modify existing data records.

Correction letters received from July 1, 2002 forward, create new versions of the existing manifest records and HWTS reports will display the most recent version. Furthermore, from July 1, 2002 forward, handlers (Generators, Transporters, and Treatment, Storage, and Disposal facilities), that submit data electronically, will be able to make corrections on-line.

From January 1, 1993, DTSC added a notation to manifest records with correction letters, along with the microfilm roll and frame number of the letter. Additionally, images of correction letters received from January 1, 1997 forward, have been electronically imaged. Images are linked to the original manifest and available on the Intranet for 1997 and 1998. Technical problems have delayed the posting of correction letters for the period January 1, 1999 through June 30, 2002.

5. 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.

6. Handling of Invalid Fields:

a. Invalid waste codes: Waste codes that do not match system lists are replaced with A***≅ for California waste codes, and A****≅ for RCRA waste codes. Invalid information may have been entered by the generator or may be a key data entry error.

b. Invalid Dates: The old 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 displayed Azero-year≅ summaries. However, the HWTS does not permit blank/invalid dates to be deployed. 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. In the future, manifest records will be flagged and manifest detail reports will eventually indicate which dates were inserted, rather than key data entered from the manifest.

c. Handling Method Codes: Invalid handling method codes (from box K) are replaced

with A***≡.

7. Duplicate Manifests: Manifests with duplicate manifest numbers exist in the manifest tracking system. To assure that each manifest is identified as a unique manifest, HWTS performs a comparative analysis on each manifest to assess its uniqueness.

8. Paired vs. Matched: A manifest consists of six copies. DTSC is supposed to receive 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 Apaired≡ when DTSC receives both G and D copies of a manifest, with an identical manifest number and the same shipment date. They are considered as Amatched≡ when the information on both the G and D versions is identical. Previously, unmatched but paired versions were referred to as Avirtual duplicates≡.

9. System Calculations:

a. 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

b. Use of Alternative TSDf: Some reports display counts for both the TSDf and the Alternate TSDf. These should not be added together. If the user of a report adds these two columns together, the resulting sum may inappropriately double count tonnage as some Alternate TSDfs and Primary TSDfs are actually the same facility.

c. Large Tonnage Error: Prior to May 1, 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.

d. Invalid Units of Measure: Prior to May 1, 2002, invalid units of measure or invalid

measures were flagged as errors, with tonnage set to zero. The new system will have a validation check, that will identify invalid measures, and will automatically send correction notices to the Generator, to prevent similar future errors.

10. Reduced Manifest Requirements: Health and Safety Code Section 25160.2 allows certain types and amounts of hazardous wastes to be manifested under a consolidated manifest procedure, formerly known as milkrun shipments. Under this procedure, transporters, rather than businesses actually generating the wastes, are listed as generators on the manifests for the consolidated shipments. Actual Generator information for these shipments will be documented in the Transporter Quarterly Reports, which will first be submitted on October 31, 2002. In the near future, possibly during 2003, the HWTS will be expanded to include Transporter Quarterly Report information, which will provide detailed information about consolidated shipments.