



E-Manifests

The Latest on EPA's New Hazardous Waste Tracking System

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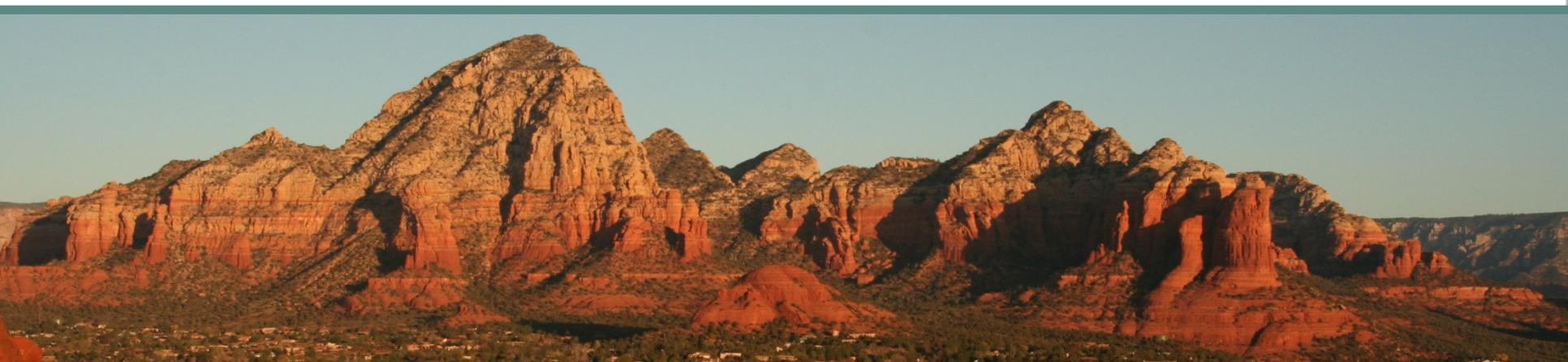
E-Manifests: The Latest on EPA's New
Hazardous Waste Tracking System

INTRODUCTION

- Reinforcing the Basics
- Industry Responsibilities
- How to Sign Up
- Communication Plan
- Resources

Benefits

- Option to create and submit manifests electronically
- Cost savings and paperwork burden reductions
- Accurate more timely information on waste shipments
- Creation of a single hub for reporting of manifests data
- More effective compliance monitoring by regulators
- Potential to integrate with RCRA's biennial report and state systems
- Enhanced "cradle to grave" tracking of HW



Top Five Things

1. e-Manifests will launch on June 30, 2018
2. Available for testing prior to launch through Spring 2018
 - <https://rcrainfopreprod.epa.gov/rcrainfo/action/secured/login>



Top Five Things

3. Receiving facilities must submit manifests to EPA

- RCRA hazardous waste and/or state only hazardous waste
- TSDFs and RRFs and facilities that receive state only hazard waste
- Electronically or paper (all or nothing)
- To submit electronically each facility must register for E-manifest

■ User Fee rule set fees charged to receiving facilities

- | | |
|--|------|
| – Electronic submission (includes hybrid manifest) | \$4 |
| – Data file uploads | \$7 |
| – Image uploads | \$13 |
| – Mailed paper | \$20 |

\$4



\$20



Top Five Things

4. A Handler should register for e-Manifests if:

- Initiate/create an e-manifest
- Submit an e-manifest to EPA
- Make corrections to an e-manifest
- Track its waste through the e-manifest system

5. Manifest data will be available 90 days after EPA's receipt of the manifest



One Year Rule Issued

- February 17, 2014
 - e-manifests are legal equivalent to paper forms
 - Consistent implementation in all states
 - System to be hosted by EPA
 - Recommendations on e-signatures
 - Cannot submit both paper and e-manifests from the same TSDF



**RULES
ARE
RULES.**

Manifest Options

■ Electronic

- Created in e-manifests
- Signed electronically by all entities on the manifest

■ Hybrid

- Starts as electronic manifest
- Printed copy signed by generator and remains with generator
- Signed electronically by transporters and receiving facility

■ Paper

- Generator, transporter and receiving facility all sign on paper
- Allowable through June 30, 2021



Permission Levels

- **Viewer**
 - Can search and view documents
- **Preparer**
 - Can prepare documents by entering data
 - Can edit documents
 - Can help others register
- **Certifier**
 - Can sign and submit documents
- **Site Manager**
 - Can manage all sites under his/her control
 - Automatically registers his/her sites for e-manifest
 - Can register other company users



System Launch

Saturday, June 30, 2018

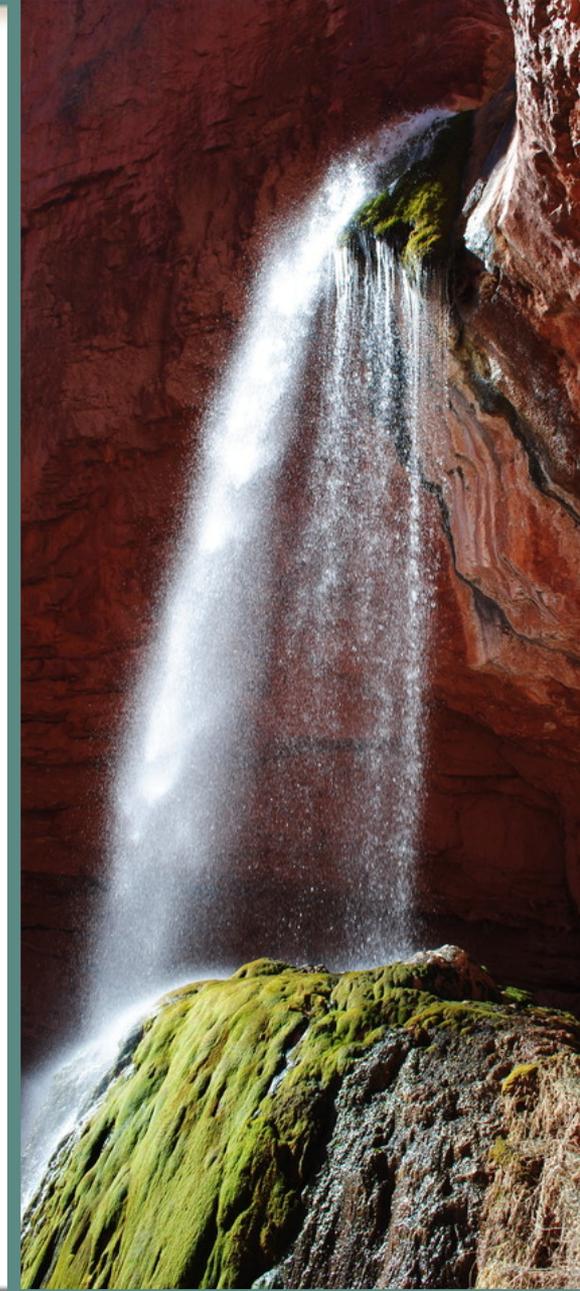


Who should register?

- **Receiving Facilities**
 - TSDFs
 - RRFs
 - Sites receiving state regulated hazardous waste
 - Sites receiving PCB wastes shipped on a manifests

- **All such facilities must register**

- **EPA recommends 2 persons register as site managers**
 - Ensures coverage at all times
 - Can register others at company for e-manifests



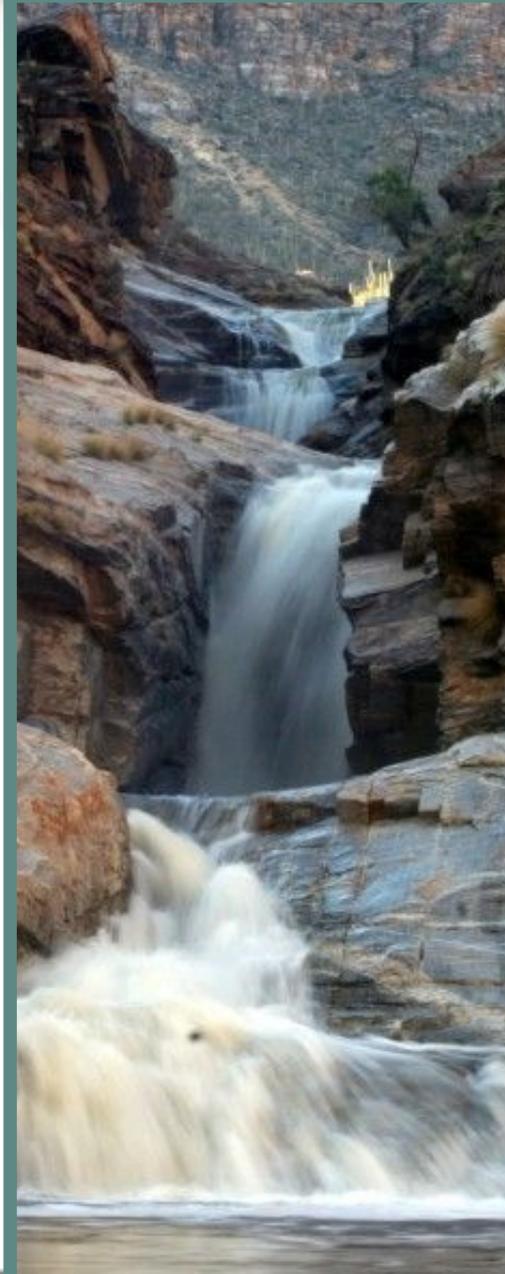
Receiving Facilities Responsibilities

- **Must have an EPA ID number**
- **Responsible for submitting manifest to EPA**
 - Only handler type that will submit directly to EPA
 - Facilities no longer submit manifests to the states
 - All hazardous waste manifest options
 - Electronic
 - Hybrid
 - Paper
 - Manifests with any regulated materials
 - Submit copies within 30 days of receiving waste
 - Paper manifests received thru September 1, 2018 can be submitted up until September 30, 2018



Receiving Facilities Responsibilities

- **Cannot submit both electronic and paper**
 - All electronic
 - Electronic
 - Hybrid
 - Data uploads
 - All paper
 - Paper mailed to EPA
 - ~~Paper scanned and e-mailed to EPA~~



Receiving Facilities Responsibilities

■ Responsible for paying the e-Manifest fees

- e-Manifests through RCRAInfo app - \$4
- Hybrid manifests - \$4
- e-manifests through data file upload - \$7
- ~~Scanned paper manifest by image upload~~ - \$13
- Mailed paper manifests - \$20

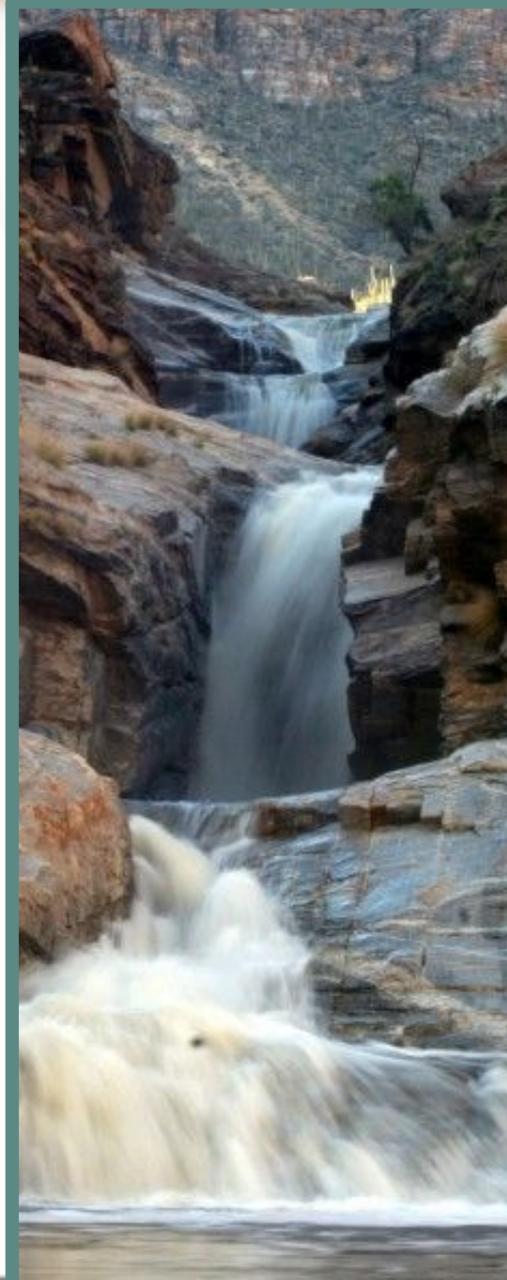
– Register with pay.gov

– Click the “Pay Bill” button

- Payments will be handled by the US Department of Treasury through the pay.gov website

■ Should not submit voluntary manifests

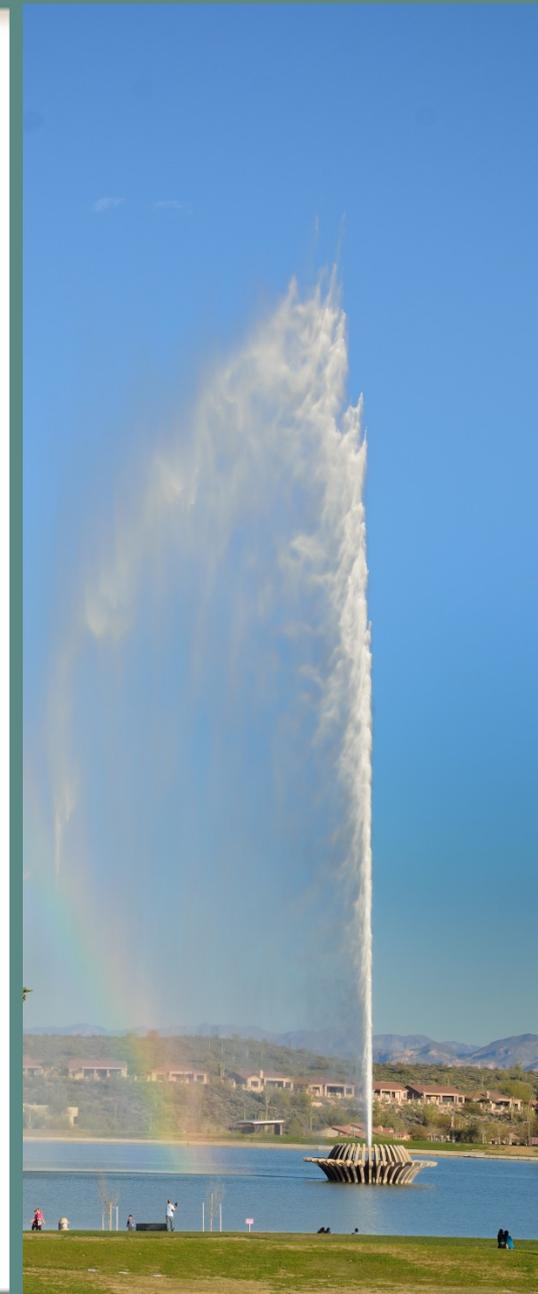
– Will result in unnecessary fees



Receiving Facilities Responsibilities

- **Work with your customers**
 - Ensure transporters are using proper manifest type
 - Ensure generators are using proper manifest type
 - Review procedures for using e-manifests

- **For generators still using paper manifests**
 - Return Designated Facility to Generator copy
 - Within 30 days from the end of the month of shipment
 - Hybrid
 - Scanned
 - Paper



Who should register?

■ Generators

- Create an e-manifest
- Edit an e-manifest
- Track waste through the e-manifest system
- View manifests submitted to EPA
- Use API (Advance Programming Interface)
 - Adds e-manifest capabilities to existing manifest systems

■ ADEQ recommends all **LOGs** register

- System is used to submit biennial and annual reports

■ EPA recommends 2 persons register as site managers

- Ensures coverage at all times
- Can register others at company for e-manifests



Who should register?

■ Transporters

- Delivering to receiving facilities using e-Manifests
- Create e-Manifests for their customers

■ Responsibilities

- Obtain portable devices and network connectivity
 - Smart phone
 - Tablets
- Converting hybrid manifests
- Must still carry one paper copy of manifests in vehicle
- Work with customers
 - To select manifest creation option
 - Electronic, hybrid or paper



Who should register?

■ Brokers

- Prepare e-Manifests for their clients
- May service multiple clients
- Track manifests activities

■ Responsibilities

- Must have an updated EPA ID number
- May not sign manifests remotely for clients
- To sign manifest broker must
 - Operating at the generator site
 - Be the offeror of the waste shipment
- Work with customers
 - Select manifest creation option
 - Electronic, hybrid or paper



Other responsibilities

- **All hazardous waste handlers**
 - Handlers need to have been assigned an EPA ID number
 - If you are VSQG and do not wish to use e-manifest you do not need an EPA ID number
 - Check with your destination facility
 - Will your site be required to participate in e-manifests?
 - Obtain new 5 copy manifest forms if not participating
 - Ensure site information submitted to ADEQ is up-to-date



Other responsibilities

- **All hazardous waste handlers**
 - Prepare to phase out old manifest forms
 - Add label “designated facility to EPA’s e-Manifest system” to the top copy
 - Prepare to transition to e-manifests
 - Update processes and systems
 - Prepare to phase in new 5 copy paper manifest forms
 - New form will be become effective **September 1, 2018**
 - Use these only if e-Manifests is delayed or not opting into e-Manifests

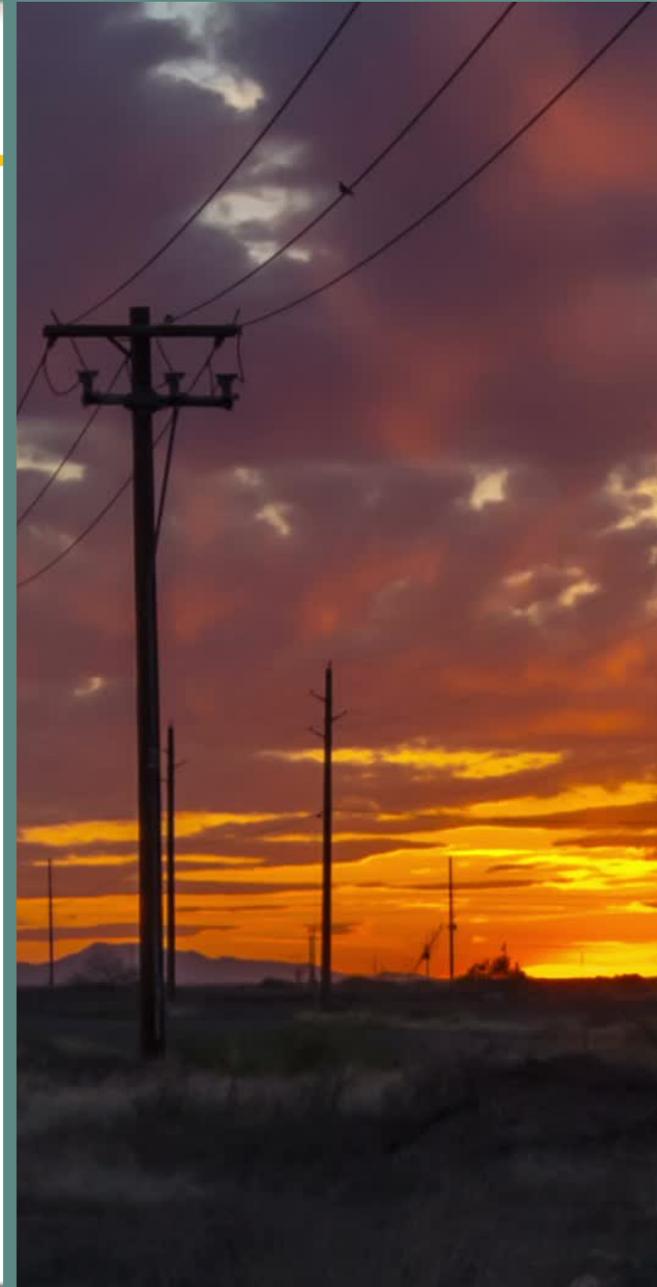


Communication Plan

- ADEQ's website
 - Posted by June 15, 2018
 - Latest information on e-Manifests
 - How to Register for e-Manifests
 - e-Manifests Fact Sheets

- E-mail blast to all active EPA ID numbers
 - Sent June 19, 2018
 - Registration is now live

- Webinars with up-to-date information
 - Thursday, May 24, 2018 – 1:00 to 2:00 PM
 - Thursday, June 21, 2018 – 1:00 to 2:00 PM



Communication Plan

- **Hazardous Waste Rulemaking**

Date: Friday, June 29, 2018

Time: 10 a.m. to 12 p.m.

Location:

ADEQ, 1110

W Washington Street

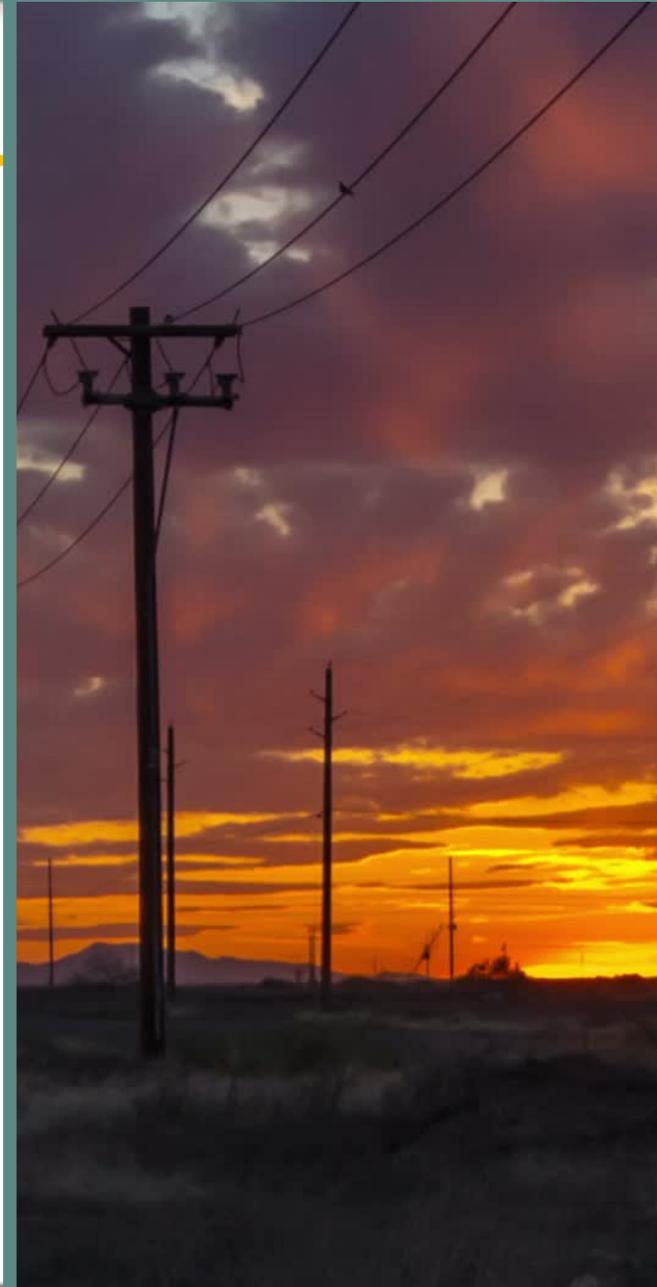
Room 3175

Phoenix, AZ 85007

In Person

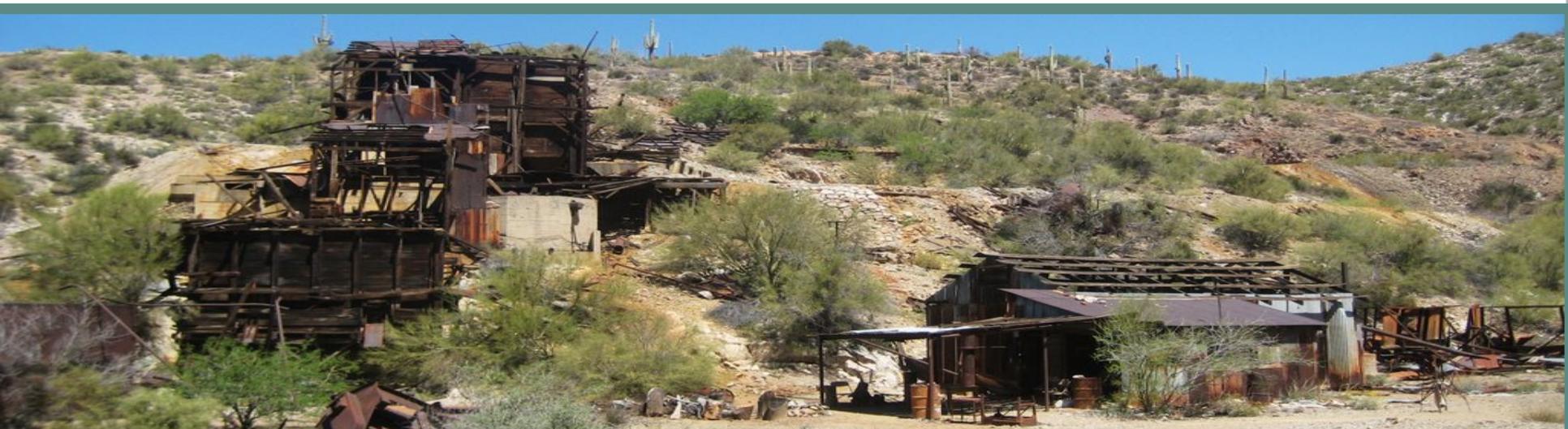
On line

- <http://azdeq.gov/hazrule-meetings>



■ Resources

- RCRAInfo
 - <https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>
 - <https://rcrainfopreprod.epa.gov/rcrainfo/action/secured/login>
- ADEQ's website
 - <http://www.azdeq.gov/node/5031>
- E-Manifest Website
 - <http://www.epa.gov/e-manifest>





Questions?

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