



EPA e-Manifest System Webinar

July 19, 2018
9:00 AM PDT

 A yellow hazardous waste manifest form with a red border. The text on the form includes:

- HAZARDOUS WASTE**
- FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.**
- IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.**
- GENERATOR INFORMATION:**
 - NAME _____ PHONE _____
 - ADDRESS _____ STATE _____ ZIP _____
 - CITY _____
 - EPA ID NO. / DOCUMENT NO. _____
 - ACCUMULATION START DATE _____
 - EPA WASTE NO. _____
- D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX**
- HANDLE WITH CARE!**
- HW1**
- NMFC**

 A detailed EPA e-Manifest System form, titled "UNIFORM HAZARDOUS WASTE MANIFEST". It includes sections for:

- GENERATOR INFORMATION:** Name, address, EPA ID number, and contact details.
- HAZARDOUS WASTE INFORMATION:** Waste description, quantity, and hazard codes.
- TRANSPORTER INFORMATION:** Name, address, and EPA ID number.
- RECIPIENT INFORMATION:** Name, address, and EPA ID number.
- HAZARDOUS WASTE DESCRIPTION:** Detailed description of the waste, including its physical and chemical properties.
- HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL (TSD) INFORMATION:** Details about the facility where the waste is being managed.

 The form is marked with a large "SAMPLE" watermark.

Presented by:

James Kapin, MPH, CIH
Manager of EM Services
ACTenviro

info@actenviro.com

Uniform Hazardous Waste Manifests



- Hazardous Waste Manifests are Required by EPA.
- Manifest system tracks hazardous waste:
 - Generator, Transporter(s) and TSD each sign and retain a copy
 - TSD returns signed copy to the generator & state regulators
 - CA Generators also send copies to DTSC
- When completed, it records
 - Generator, Transporter and TSD
 - The type and quantity of the waste generated and transported,
 - Instructions for handling the waste
- Waste manifests are a generator document
 - Typically prepared by broker/shipper and signed by generator

Shipping Paper Requirements



- DOT requires shipping papers for Haz. Materials
 - Hazardous waste is a hazardous material
 - Manifests satisfy DOT requirements for transportation of Hazardous Waste (in addition to EPA requirements)
 - Paper manifests can be replaced by e-Manifest
- Other Types of HazMat shipping papers include:
 - Bill-of-Lading (BOL) – for non-waste hazardous materials (i.e. universal waste)
 - Non-Hazardous Manifest – equivalent to BOL
 - Consolidated Manifest – used for some types “milk run” waste (e.g. oil recycling)
 - Medical Waste Tracking Document
 - Not addressed by e-Manifest

What is the E-Manifest System?

- National system for electronically tracking haz waste shipments.
 - Access through EPA RCRAid system
- When implemented, Generators or Transporters can originate & e-sign e-manifests
 - Electronic hardware/software needed for e-shipping papers
 - Manifest terminate at TSD, electronic records distributed
- Enhanced tracking, data access, paperwork reduction
 - Significant technical and logistical remain
- System went live on 6/30/18



Why e-Manifest?

- Intended to improve access to data, save time, resources, and dollars
- When fully implemented, e-Manifest will provide:
 - Cost savings (through paperwork reduction);
 - Improved access to better and more timely waste data;
 - Enhanced shipment tracking capabilities and notification of discrepancies for users;
 - Enhanced inspection and enforcement capabilities for regulators;
 - One-stop reporting of manifest data for use by EPA and states;
 - Potential to integrate manifest reporting with RCRA biennial reporting and other federal and state information systems.
- Significant issues remain for full implementation!

E-Manifest Process Overview



- e-Manifest launched nationwide on June 30, 2018.
- Generators and transporters have the ability to create and sign e-manifests,
 - Generators must register to originate/sign or correct e-manifests.
 - Broker ability to originate manifests for generators under development
- Receiving facilities (including non-RCRA facilities) must register and submit manifests to EPA through e-Manifest (paper or electronic)
 - Receiving facilities can sign e-manifests electronically
 - EPA will charge receiving facilities a fee for each manifest
- e-Manifest data will be available to the public 90 days post-receipt of the manifest.



System Issues



- Designed by EPA, based on regulatory framework
 - (manifests are generator documents)
- Doesn't accommodate brokers
 - Broker capabilities not fully developed yet
 - Lack of system “back end” - can save templates but no profiles
 - e-Manifests must each be created individually
- Doesn't address DOT requirements
 - DOT still requires paper copy in vehicle (even if manifest originated electronically)
- E-Manifest does not create or manage labels, LDRs, BOLs (for UW), MWTDs or other documents

How will this work?

- e-Manifest Option
 - Manifest originates electronically then managed, signed and submitted electronically
 - This is the EPA goal, but practical issues remain (for example DOT still requires hard copy in vehicle)
- “Hybrid” manifest Option
 - Generator creates/signs paper manifest, transferred to e-manifest by transporter, then submitted electronically
 - Complicated, with little benefit
- Paper Option
 - Paper manifest, submitted to e-Manifest by TSD
 - Does not provide benefits of full e-manifest, but allows use of current process, only changes are at TSD
 - Option selected by ACT (and most other brokers)

Manifest Termination (at TSD)

- E-Manifest
 - Fully electronic or Hybrid
 - Submitted when received/e-signed
- Paper Manifest
 - Paper only (snail mail)
 - Image Only (upload)
 - Paper (Data/Image upload)
 - ACT option, \$15/manifest cost to ACT customers
- Timing
 - Instant for e-Manifest
 - 30 days for paper (normally)
 - Temp. extension – until 9/30 for manifest received before 9/1



Questions??

Up next ...

Impact on Generators



Manifest Management – New 5-Copy Manifest



- E-Manifest will affect manifest management:

6-Copy Manifest (current)	5-Copy Manifest (e-Manifest)
Page 1 (top copy): Designated facility to destination State	Page 1 (top copy): Designated Facility to e-Manifest
Page 2: Designated facility to generator State	
Page 3: Designated facility to generator	Page 2: Designated facility to generator
Page 4: Designated facility's copy	Page 3: Designated facility's copy
Page 5: Transporter's copy	Page 4: Transporter's copy
Page 6 (bottom copy): Generator's initial copy	Page 5 (bottom copy): Generator's initial copy

New 5-Copy Manifest

- Unless manifest originates electronically, CA Generators must still send extra copy to DTSC
 - If waste is generated or handled by a permitted facility in CA or imported or exported from CA
 - Not required for e-manifests
- New 5-copy forms not available until September (at the earliest)
- Generators may see current (6-copy) form until transition is complete



What Can You Do to Get Ready?



- Register site & users in RCRAid
 - e-Manifest is part of RCRAInfo - EPA's system to track generation, shipment, treatment and disposal of hazardous wastes.
 - Registration required to create, track e-Manifest
 - Manifest correction will be done through e-Manifest, even for paper manifest

EPA Form	RCRAInfo Industry App	Status
Site Identification Form (EPA Form 8700-12)	MyRCRAid	Available now in certain states
Biennial Report (EPA Form 8700-13)	Biennial Report	Available now in certain states
Hazardous Waste Manifest (EPA form 8700-22)	e-Manifest	Launching June 30, 2018, everywhere

RCRAinfo Permissions



- RCRAinfo allows for the following user permissions:
 - Viewer - User can view site data for the sites but cannot change the information.
 - Preparer - User can enter data for the sites, cannot sign/submit
 - Certifier - User can sign and submit the information for these sites to the regulatory authority. Requires an Electronic Signature Agreement.
- Also, new Site Manager
 - View, prepare, sign forms, approve other users in their company
 - When e-Manifest launches, existing Site Managers can use the module without undergoing a new registration process
 - EPA encourages all facilities to have two Site Managers



RCRAid Permission Levels



Manifest Functions	Viewer	Preparer	Certifier	Site Mgr.
View	Yes	Yes	Yes	Yes
Create, Edit Drafts	No	Yes	Yes	Yes
Sign, Correct, Submit	No	No	Yes	Yes
Approve users, grant permissions	No	No	No	Yes
View invoices, submit payments.	No	No	No	Yes

Each signer (generator, transporter, TSD) must be registered in RCRAinfo



Non-RCRA Facilities in RCRAid

- Non-RCRA facilities (CAL EPA Id #s) cannot be registered in RCRAid - DTSC work-around:
 1. Log into RCRAInfo/myRCRAid.
 2. Select “Need site ID” not “Add existing site ID”.
 3. Enter your data, when it asks if you are a Large, Small, or Very Small Quantity Generator select N (Not a Generator).
 4. Complete the online application.
 5. In the Comments section, enter your ID number and state “add for e-Manifest” (e.g., CAL000123456 add for e-Manifest). This section is very important!
- DTSC staff will enter your ID number in RCRAInfo. Any CA questions can be directed to e-manifests@dtsc.ca.gov; staff will be able to assist you.

Take-Home Lesson:

- ACT will maintain current manifest workflow until all issues are resolved
 - ACT Treatment will be uploading electronic data at the end
 - Similar approach at other facilities
- Generators don't need to do anything different
- Cost will be \$15/manifest
- Stakeholder Fact Sheets and FAQ posted – more info for:
 - Generators,
 - Transporters,
 - TSDFs,
 - Receiving Facilities,
 - Brokers,
 - <https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest>
 - <https://www.epa.gov/e-manifest/fact-sheets-e-manifest-stakeholders>

Questions?



Send additional questions:
info@actenviro.com

