e-Manifest - Lessons Learned
So how did it go?
Summary

- A quick historical perspective.
- The basics of how e-Manifest works.
- 8 Months of e-Manifest, How did it go?
- What are our current struggles?
- What can we expect next, and when?
e-Manifest Rule Overview

Goals of the e-Manifest Program
- National tracking of hazardous waste shipments
- Saving time
- Reducing paper use
- Replaces state management of manifest data
- Future biennial report features

How it works
- EPA’s Web Application
- EPA’s system stores all manifested shipments
- TSDFs are a pivotal part of this process
- Everyone is in!
# e-Manifest - A Historical Perspective

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/5/2012</td>
<td>• Hazardous Waste e-Manifest Establishment Act</td>
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<td>• One Year Rule</td>
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<td>• e-Manifest System Due Date</td>
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<td>• E-Manifest Advisory Committee</td>
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<td>1/3/2018</td>
<td>• Fee Rule</td>
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<tr>
<td>6/27/2018</td>
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<tr>
<td>6/30/2018</td>
<td>• Ready, Set...Go!</td>
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<tr>
<td>7/17/2018</td>
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<tr>
<td>12/7/2018</td>
<td>• PHMSA allowance for electronic signatures</td>
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</tbody>
</table>
e-Manifest Process Flow
The Four Options

Fully electronic (0.2%)
  • Register your site(s)
  • Register user(s)
  • Everything is completed through EPA’s system

Data plus image - paper (76.1%)
  • Complete a paper manifest
  • TSDF uploads data, plus paper image to EPA

Image only - paper (16.5%)
  • The TSDF uploads a paper image to EPA

Mailed copy – paper (7.2%)
  • Paper copy mailed to EPA
The Dollars and Cents

<table>
<thead>
<tr>
<th>Manifest Submission Type</th>
<th>Fee per Manifest</th>
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<tbody>
<tr>
<td>Mailed in Paper Manifest</td>
<td>$15.00</td>
</tr>
<tr>
<td>Scanned Image Upload</td>
<td>$10.00</td>
</tr>
<tr>
<td>Data + Image Upload</td>
<td>$6.50</td>
</tr>
<tr>
<td>Fully Electronic Manifest</td>
<td>$5.00</td>
</tr>
</tbody>
</table>

- Fees are charged to the TSDF and then billed to the generator
- Fees for rejections
- Covers imports but not exports
- As of June 30, MI will no longer charge manifesting fees
- Current fees are through 9/30/2019
  - Formula – full cost recovery 2-year re-evaluation
How Did it Go?

- Sequestration
- EPA's change in course
- June 30th, Paper or Electronic?
- 6-part or 5-part?
- What Price is Right?
- US Inspector General Report
- Where to mail paper copies?
- No ability to make corrections
- Getting the first bill from EPA
- Those states that just like to be different

The good thing is that generators saw little change on 6/30
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What Are The Current Struggles?

Disposal Facilities
- Getting generators registered on RCRAInfo.gov
  - Final manifest copies
- Data upload validation – bad data
- Who’s manifest gets to EPA first
- No notifications
- Use of the dashboard in e-Manifest
- Clarity on what to do with rejections
- Fully Electronic Shipments
  - We can’t use our systems
  - Who will and won’t allow electronic shipments
Registering with EPA

Overall one of the biggest issues.
• Site Manager
• Certifier
• Preparer
• Viewer
  • How do Drivers fit into this?

• Why should you register with EPA today?
  • EPA’s manifest database
  • Even if you are using paper manifests
<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Address</th>
<th>City</th>
<th>State</th>
<th>County</th>
<th>Status</th>
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<tbody>
<tr>
<td>INR000125641</td>
<td>EQ INDUSTRIAL SERVICES INCORPORATED</td>
<td>2650 N. SHADELAND AVE</td>
<td>INDIANAPOLIS</td>
<td>IN</td>
<td>MARION</td>
<td>Active</td>
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<tr>
<td>MIK939928313</td>
<td>EQ TRANSFER AND PROCESSING</td>
<td>2000 E FERRY ST</td>
<td>DETROIT</td>
<td>MI</td>
<td>WAYNE</td>
<td>Active</td>
</tr>
<tr>
<td>MID000724831</td>
<td>MICHIGAN DISPOSAL INC</td>
<td>49350 NORTH I94 SERVICE DRIVE</td>
<td>BELLEVILLE</td>
<td>MI</td>
<td>WAYNE</td>
<td>Active</td>
</tr>
<tr>
<td>MID074259565</td>
<td>US ECOLOGY MICHIGAN INC</td>
<td>6520 GEORGIA ST</td>
<td>DETROIT</td>
<td>MI</td>
<td>WAYNE</td>
<td>Active</td>
</tr>
<tr>
<td>MID049090633</td>
<td>WAYNE DISPOSAL INC</td>
<td>49350 N I94 SERVICE DR</td>
<td>BELLEVILLE</td>
<td>MI</td>
<td>WAYNE</td>
<td>Active</td>
</tr>
<tr>
<td>NVD048946016</td>
<td>US ECOLOGY INC RADIOACTIVE WASTE SITE</td>
<td>HWY 95 11 MI S OF</td>
<td>BEATTY</td>
<td>NV</td>
<td>NYE</td>
<td>Active</td>
</tr>
<tr>
<td>NVT330010000</td>
<td>US ECOLOGY NEVADA, INC</td>
<td>HWY 95 11 MI S OF BEATTY</td>
<td>BEATTY</td>
<td>NV</td>
<td>NYE</td>
<td>Active</td>
</tr>
<tr>
<td>VA988177803</td>
<td>HEATING AND OIL</td>
<td>144 FIRST STREET</td>
<td>FREDRICKSBURG</td>
<td>VA</td>
<td>FAIRFAX</td>
<td>Active</td>
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<tr>
<td>VATEST000001</td>
<td>TEST TRANSPORTER 1 OF VA</td>
<td>2777 SOUTH CRYSTAL DRIVE</td>
<td>ARLINGTON</td>
<td>VA</td>
<td>ARLINGTON</td>
<td>Active</td>
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<tr>
<td>VATEST000002</td>
<td>TEST TRANSPORTER 2 OF VA</td>
<td>2777 S CRYSTAL DRIVE</td>
<td>ARLINGTON</td>
<td>VA</td>
<td>ARLINGTON</td>
<td>Active</td>
</tr>
<tr>
<td>YAD000532119</td>
<td>TEST TSDF OF VA</td>
<td>123 MAIN ST</td>
<td>ARLINGTON</td>
<td>VA</td>
<td>ARLINGTON</td>
<td>Active</td>
</tr>
</tbody>
</table>
US ECOCOLY MICHIGAN INC
6520 GEORGIA ST - DETROIT
MID074259565

Site Details

General Overview

Federal Generator Status
Large Quantity Generator

State Generator Status
Large Quantity Generator - Generates 1,000 kg of hazardous waste in any calendar month during a year or a small quantity generator that has more than 6,000 kg of hazardous waste accumulated on-site. See regulations for acute waste.

Is Site Active
Yes

Date Last Updated
12/03/2018

Site Mailing Address

6520 GEORGIA ST
DETROIT, MI 48211

Map

Map

Satellite

Map data ©2019 Google Terms of Use
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What Are Our Current Struggles?

Generators

- Shipments that don’t require a manifest
  - Used Oil
  - Universal waste
  - Non hazardous waste
  - VSQG
- Maintaining users in RCRAInfo.gov
- Site updates must be conducted using the 8700-12
- No broker functionality
What Are Our Current Struggles?

States

• Funding
  • Loss of manifest fees

• Training
  • From state to federal systems

• Data Management
  • Increasing file size

• EPA is behind inputting manifest data

• Scanned manifest legibility
The Future of e-Manifest

There is still some work to do:

- Broker functionality
- e-Signature outside EPA’s system
  - 3rd Party CROMERR-complaint options
- A simplified way to manage users in RCRInfo.gov
  - All generators have access
- Biennial Report
- EPA’s Information Collection Request
  - Comment period ends 4/9

Until we solve the signature and access issues, paper it is.
Resources

• EPA’s e-manifest webpage: https://www.epa.gov/e-manifest

• Test Drive the System: https://www.epa.gov/e-manifest/how-participate-testing-hazardous-waste-electronic-manifest-system-system-e-manifest


• Fred Jenkins (EPA) – 703-308-7049 or Jenkins.fred@epa.gov
  • E-manifest email list (general) – eManifest-subscribe@lists.epa.gov
  • E-Manifest email list (development) – e-ManifestDev-subscribe@lists.epa.gov

• Questions or Comments:
  • Brian Lindman – 303-818-5456 or brian.lindman@usecology.com
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