EPA e-Manifest - Is this really happening?
Sarah Henderson, CHMM
Sr. Business Analyst
Sphera Solutions
Agenda

- What is e-Manifest
- History of e-Manifest
  - Linked to RCRA Info
- How does it work – basic flow
- Registration and e-Manifest user types
- How much will it cost – User Fee Rule
- Who will pay the fees?
- System to System
- Moving forward...
- Screen shots and functionality
- FAQs along the way
• e-Manifest is a software application that is designed to allow hazardous waste handlers to manage and track hazardous waste manifests through an electronic record rather than a multi-copy paper record.

• It is a module of EPA’s existing RCRA Info System

• RCRAInfo is EPA’s existing information system that collects information on hazardous waste sites (generator registration, biennial information)

• e-Manifest will be linked to RCRAInfo and will have the ability to validate information entered on an electronic manifest against information in RCRAInfo
EPA’s initial proposal to transition from paper-based to electronic-based reporting occurred in May 2001.

EPA is establishing the e-Manifest system according to the Hazardous Waste Electronic Waste Manifest Establishment Act, enacted into law on October 5, 2012.

The “e-Manifest Act” authorizes the EPA to implement a national electronic manifest system and required that the costs of developing and operating the new e-Manifest system be recovered from user fees charged to those who use hazardous waste manifests to track off-site shipments of their wastes.
EPA decided that electronic manifesting would produce numerous benefits:

- cost savings
- better, and more timely information on waste shipments
- rapid notification of discrepancies or other problems related to a particular shipment
- the creation of a single hub for one-stop reporting of manifest data to EPA and states
- increased effectiveness of compliance monitoring of waste shipments by regulators
- and the potential for integrating manifest reporting with the Resource Conservation and Recovery Act (RCRA) biennial reporting process and other federal and state information systems.

- Launch date June 30, 2018
If you are a Receiving Facility (TSDF)...
There are three ways for receiving facilities to submit a paper manifest:
1. through the U.S. mail
2. upload of a scanned image of the manifest
3. sending a data file plus a scanned image of the manifest

Or go completely electronic!

• EPA will charge a user fee for each manifest based on how the manifest was submitted and the corresponding costs to EPA to process the data.
• Beginning on September 1, 2018, receiving facilities must submit all paper manifests to EPA within 30 days of receipt by the receiving facility, as required by the regulations.
Can I use paper manifests after June 30, 2018?
Yes. EPA strongly encourages the use of electronic manifests. (it’s the least expensive way)

Can I use the six copy manifest forms or do I have to transition to the new 5-copy forms?
The 5-copy form also removes and consolidates two of the old 6-copy forms, i.e., the two copies marked “Designated facility to consignment state” and “Designated facility to generator state.” Top copy will be submitted to EPA’s e-Manifest system and states can get them through the e-Manifest system.

Six copy forms can still be used. EPA strongly recommends applying a pre-printed adhesive label to the top copy with the accurate copy distribution language ("designated facility to EPA's e-Manifest system").

Phase out paper manifests in 5 years from launch.
## Three Types of Hazardous Waste Manifests

### Paper
- Generator, Transporter and Receiving facility all sign a paper copy of the manifest

![Paper Manifest](image)

### Hybrid
- Waste manifest starts as a paper manifest signed by the Generator
- Transporters and Waste Receiving Facility electronically sign the manifest

### Electronic
- Created in the e-Manifest system
- Electronically signed by Generator, all Transporters and Receiving Facility

![Electronic Manifest](image)
Step 1
1. Paper manifest is signed by both Generator and Transporter.
2. Transporter leaves paper/image copy with the Generator.

Step 2
4. Transporter enters paper manifest form into e-Manifest, acknowledges receipt electronically.
5. Transporter takes shipment and electronic manifest to receiving facility.
5b. The Transporter carries the DOT required signed paper copy on their truck.

Step 3
6. TSDF/receiving facility signs electronically for receipt.
7. Shipment/transport complete.
8. Generator is notified electronically and directed to e-Manifest to access manifest data.
9. Copies distributed electronically to states.
10. TSDF uploads data corrections electronically.
Generator Login
Creates Manifest
“Draft”
“Pending”

Receiving Facility Login
Moves manifest status from
“Pending” to “Scheduled”

Transporter Login
Reviews manifest and electronically signs for it. Status is “In Transit”

Receiving Facility Login
Truck arrives at Receiving Facility. Validations made and Discrepancies are corrected “Ready for Signature” “Signed” “Complete”
Most generators and receiving facilities have Environmental Management/Waste Management Software. This electronic process will require dual entry:

- Once in the generator or TSDF Environmental Management/Waste Management Software
- Once in the EPA e-Manifest application

EPA anticipated this and made an API (Application Programming Interface) available. It’s a communication protocol, defines what kind of information is exchanged and where to map it.

When you use your debit card at the grocery store, there is an API between the POS software and your bank.
• Corporate Waste Tracking Systems typically create waste containers, track containers create and print manifests
• Manifest repository (manifest is provided by the contractor)
  • All of these “benefits” require double entry!
  • cost savings
  • better, and more timely information on waste shipments
  • rapid notification of discrepancies or other problems related to a particular shipment
  • the creation of a single hub for one-stop reporting of manifest data to EPA and states
  • increased effectiveness of compliance monitoring of waste shipments by regulators
  • and the potential for integrating manifest reporting with the Resource Conservation and Recovery Act (RCRA) biennial reporting process and other federal and state information systems.
• A case for System to system – One version of the truth. Your manifests = your biennial report!
• Know the current status of your hazardous waste shipment inside your Corporate Waste Tracking System (no swivel chair activity)
  • Zero time spend manually reading a marked up paper manifest and entering manifest corrections into your Corporate Waste Tracking System
  • Reduce time spent on manifest reconciliation process
  • Reduce time and costs of printing paper manifest on impact, tractor feed dot matrix printers

“Every time you can work more efficiently, you’re improving the bottom line.”
David Tulauskas, GM Sustainability Director (May 2018),
• If you have a corporate EH&S application, it is separate from e-Manifest but the systems CAN be connected.
• If you registered (generators, transporters, brokers and receiving facilities) you will have access to the e-manifest system.
• Will Sphera applications like HMMS send data to the e-manifest system?
  • Integration is on our roadmap– will users have to ability to upload manifest information into e-manifest from HMMS via an API?
  • will users have to ability to download manifest information from e-manifest into HMMS via an API?
• Sphera will assist Department of Defense and Defense Logistics Agency in navigating this new regulation and helping them gain efficiency. Ask questions!
• Waste contracts typically require the contractor to provide the hazardous waste manifest. Is your contractor still providing paper? If so, it’s costing you!
  • The e-Manifest system is receiving facility focused (they foot the bill, incentivized by manifest pricing)
Registration for e-Manifest
You must REGISTER!

Generators, Transporters, Brokers, Receiving Facilities all must register!
https://rcrainfo.epa.gov
### My Sites

<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>
</tr>
</thead>
<tbody>
<tr>
<td>CA9170024740</td>
<td>MARINE CORPS AIR STATION MIRAMAR</td>
<td>45249 MIRAMAR WAY, B-6306</td>
<td>SAN DIEGO</td>
<td>CA</td>
<td>SAN DIEGO</td>
<td>Active</td>
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<tr>
<td>CA1170090020</td>
<td>POINT LOMA COMPLEX (NAVAL SUBMARINE BASE)</td>
<td>140 SYLVESTER RD BLDG 375</td>
<td>SAN DIEGO</td>
<td>CA</td>
<td>SAN DIEGO</td>
<td>Active</td>
</tr>
<tr>
<td>NC6170022580</td>
<td>MARINE CORPS BASE CAMP LEJEUNE</td>
<td>COMMANDING GENERAL G-F/EMD/ADM 12 POST LANE</td>
<td>CAMP LEJEUNE</td>
<td>NC</td>
<td>ONSLOW</td>
<td>Active</td>
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<tr>
<td>VA0000372654</td>
<td>AMERICAN TECHNOLOGY INDUSTRIES LTD</td>
<td>826 PROFESSIONAL PLACE W</td>
<td>CHESAPEAKE</td>
<td>VA</td>
<td>CHESAPEAKE CITY</td>
<td>Active</td>
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Showing 1 to 4 of 4 entries

- Add Existing Site
- Request Site ID
Request Access

```
rcrainfo.epa.gov/rcrainfoprod/action/industry/secured/home

Search Results

<table>
<thead>
<tr>
<th>Select All</th>
<th>Site ID</th>
<th>Site Name</th>
<th>Address</th>
<th>City</th>
<th>State</th>
<th>County</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MIR000036616</td>
<td>DEFENSE REUTILIZATION &amp; MARKETING SVCS</td>
<td>74 WASHINGTON AVENUE</td>
<td>BATTLE CREEK</td>
<td>MI</td>
<td>CALHOUN</td>
</tr>
</tbody>
</table>

Showing 1 to 1 of 1 entries
```

- **Request Access**
- **Back to Search Criteria**
- **Close**

© 2018 Sphera
Select Permissions Requested

You've selected 1 site(s), now please choose the permissions you are requesting:

<table>
<thead>
<tr>
<th>Module</th>
<th>Permission Level</th>
<th>Description of Permission</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Management</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Biennial Report</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>e-Manifest</td>
<td>None</td>
<td>None</td>
</tr>
</tbody>
</table>

Send Request  Back to Search Results  Close
Select Permissions for e-Manifest

rcrainfo.cpa.gov/rcrainfoprod/action/industry/secured/home

Select Permissions

You've selected 1 site(s), now please choose the permissions you are requesting.

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</tbody>
</table>

Send Request Back to Search Results Close
e-Manifest User Types

- **Site Manager**
  Recommended two Site Managers per site. One site manager can manage multiple sites. Site manager manages the users of the e-Manifest system for their organization.

- **Preparers**
  Can prepare manifests

- **Certifiers**
  Can electronically sign manifests

- **Viewers**
  Can only view manifests
Requesting Access

Request goes to EPA (or Registered Authority) for approval to associate you to the site. Once approved, your user is activated.

Dear Sarah L. Henderson <SARAHHENDERSON1>,

Your site permissions were changed by Kimberlyn W Hughes <kimberlyn.hughes@deq.virginia.gov>.

Permissions

<table>
<thead>
<tr>
<th>Module</th>
<th>Permission</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Management</td>
<td>Active</td>
<td>Manage site data and API access across all modules the state participates in.</td>
</tr>
</tbody>
</table>

Sites

<table>
<thead>
<tr>
<th>Site Id</th>
<th>Site Name</th>
<th>Status</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>VA0000372664</td>
<td>AMERICAN TECHNOLOGY INDUSTRIES LTD</td>
<td>Granted</td>
<td></td>
</tr>
</tbody>
</table>

Please contact your Administrator if you have questions or concerns.

Thank you!
RCRAInfo Team
Identity Proofing

• Electronic Signature Agreement – Electronic identity proofing
• Information is not stored, work with Lexus Nexus to provide electronic identity proofing. Information is used based off of public information to verify the user is who they say they are and therefore is allowed sign.
• Non electronic signature – send form to state of Virginia for approval.
User Fees
• Developing, operating, maintaining, and upgrading a national e-Manifest system
• Collection and processing data from paper manifests submitted to the e-Manifest system
• User fees are tailored to whether manifests are submitted electronically or via paper to reflect the varying processing costs of these options.
• Original estimates:
  • Fully electronically processed manifest = $4
  • Paper processed manifest = $7-$20

<table>
<thead>
<tr>
<th>Manifest Submission Type</th>
<th>Fee per Manifest</th>
</tr>
</thead>
<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>Electronic Manifest (Fully Electronic &amp; Hybrid)</td>
<td>$5.00</td>
</tr>
</tbody>
</table>
• The receiving facility designated on the manifest to receive shipments of waste is the user required to pay the fee.

• EPA will bill the receiving facility (TSDF) monthly

• In addition to the higher cost to submit a paper manifest, the if overall usage of electronic manifests does not reach 75% in four years the rule allows for higher fees for paper manifests.

• The goal of the User Fee Rule is to eliminate the use of paper manifests entirely by five years after launching the system.

• The fee estimates are per-manifest fees for each submission type.
Resources for help
INTRODUCTION

The Hazardous Waste Electronic Manifest Establishment Act, signed into law by President Barack Obama on October 5, 2012, authorizes EPA to implement a national electronic manifest system that facilitates the electronic transmission of the Uniform Hazardous Waste Manifest (EPA Form 8700-22). Key features of the this Act include:

- extension to all federally- and state-regulated wastes requiring manifests;
- authorization for the central collection of data from electronic and paper manifests;
- authorization for EPA to collect reasonable user fees for all system related costs including development and maintenance;
- mandate for EPA to conduct annual Inspector General (IG) audits and submit biennial reports to Congress;
- mandate for EPA to establish a uniform effective date for all States and must implement e-Manifest until States are authorized.

The final rule for the Modification of the Hazardous Waste Manifest System: Electronic Manifests, published on February 7, 2014, authorizes the use of electronic hazardous waste manifests. This modification provides waste handlers with the opportunity to complete, sign, transmit, and store manifest information electronically in the national system.

The final fee rule for User Fees for the Electronic Hazardous Waste Manifest System and Amendments to Manifest Regulations, published on January 3, 2018, outlines the fees for the system and sets a June 30, 2018, go live date for the e-Manifest system.
Industry User Registration

This course will show you how to register for a RCRAInfo Industry Application account or how to use your existing Central Data Exchange credentials to access the RCRAInfo Industry Application. Additionally, this course will show you how to request additional permissions for your existing RCRAInfo Industry Application account.

Introduction to e-Manifest

This course provides an introduction to the RCRAInfo Industry Application e-Manifest module including brief descriptions of the various methods by which a manifest may be submitted to EPA, including electronic, hybrid, data + image, image only, and paper.

Site Manager Role and Responsibilities

This course describes the roles and responsibilities for a user with the site management permission. This course also provides step-by-step instructions for functions that the site manager may need to perform.
TEST VERSION (RCRAInfo “Pre-Production”):
https://rcrainfopreprod.epa.gov/rcrainfo/action/secured/login
What about non-hazardous and universal wastes?

• e-Manifest extends to all federally and state-regulated wastes requiring manifests

• It is acceptable to ship non-hazardous wastes with hazardous wastes on the same hazardous waste manifest.

• Avoid using e-manifest for non-hazardous waste shipments. Doing so could give rise to confusion and fee issues.

What about VSQG, CESQG?

• No EPA ID = exemption exists for these sites to not use a manifest and therefore don’t need to use it. Can use a paper manifest if need to send a state that does not recognize the CESQG exemption

• Additionally, under the Generator Improvement Rule allowing VSQG to ship off site to a LQG, VSQG are not required to ship using a RCRA manifest and therefore are not subject to e-Manifest requirements.
Learn more!
Visit Sphera in the Exhibit Hall
Questions/Comments

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Resources:

epa.gov/e-manifest

Special Thanks to:
Paul Andrews
Sr. Project Manager
Sphera