
e-Manifest: 90 DAYS TO LAUNCH

MONTHLY WEBINAR
MARCH 2018



AGENDA

e-Manifest

- Reinforcing the Basics
- Latest e-Manifest News
- To Do List: EPA, States, and Industry
- Spotlight on FAQs

REINFORCING THE BASICS: TOP 5 THINGS

e-Manifest

1. e-Manifest will launch nationwide on June 30, 2018.
2. e-Manifest has been and will be available for testing, prior to launch, through Spring 2018.
3. All receiving facilities that receive waste that must be manifested under federal law or receive state-only hazardous waste that must be manifested as required by either the state in which the waste was generated or received, must submit those manifests to EPA either in paper or electronically. EPA will charge facilities an associated fee for each manifest submission.
4. Handlers will be required to register for e-Manifest to submit electronically and to make corrections.
5. Once the system launches, e-Manifest data will generally be available to the public 90 days post-receipt of the manifests.

REINFORCING THE BASICS: SCOPE

e-Manifest

- Covers all wastes shipped on a manifest pursuant to federal or state law.
 - Federal RCRA hazardous waste
 - Regulated PCB waste shipped on a manifest
 - “State-only regulated” hazardous waste (if manifest required by state)
 - Imports of hazardous waste shipped to U.S. facilities
- Exceptions:
 - HW exports not included in e-Manifest at this time.
 - Non-manifest documents (e.g., LDR notices) not included
- Current focus of program is on highway transport of domestic HW shipments

REINFORCING THE BASICS: MANIFEST TYPES

e-Manifest

- Once e-Manifest goes live on June 30, 2018, receiving facilities will have a variety of options for submitting manifests to EPA, including
 - submitting manifests directly in the e-Manifest system,
 - uploading manifest data from an industry system,
 - submitting a PDF copy of a manifest, and
 - mailing in a hard copy manifest.
 - Hybrid process - manifest starts as a paper manifest and then transitions to electronic manifest at the transporter.
- Uses CROMERR-compliant signature process.

REINFORCING THE BASICS: REGISTRATION

e-Manifest

- e-Manifest is being built as a module of EPA's RCRAInfo system.
- RCRAInfo currently has two "industry applications" available to allow for electronic submittal of two other RCRA forms.
- Once e-Manifest launches, there will be a total of three industry applications.

| 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 |

REINFORCING THE BASICS: REGISTRATION

e-Manifest

- EPA's RCRAInfo system allows users to register for several permission levels (e.g., Viewer, Preparer, Certifier).
- One permission level, newly launched in 2017, is **Site Manager**.
- As Site Manager, users can view, prepare, and sign forms in addition to approving other users in their company.
 - Full functionality for Site Managers, i.e., ability to approve other users, is coming Spring 2018.
- In addition, registering as a Site Manager through one of the existing industry applications (MyRCRAid or Biennial Report) gains you automatic access to e-Manifest when it launches in June.

REINFORCING THE BASICS: REGISTRATION

e-Manifest

- These states have opted in to either MyRCRAid or Biennial Report *(no changes from February webinar)*

| | | |
|-------------------------------|-------------------------------|----------------------------------|
| ALABAMA (BR) | IOWA (BR) | NORTHERN MARIANAS (BR, myRCRAid) |
| ALASKA (BR, myRCRAid) | KANSAS (BR) | OHIO (myRCRAid) |
| AMERICAN SAMOA (BR, myRCRAid) | MAINE (BR, myRCRAid) | OKLAHOMA (BR, myRCRAid) |
| ARIZONA (BR) | MASSACHUSETTS (BR) | PUERTO RICO (myRCRAid) |
| ARKANSAS (myRCRAid) | MICHIGAN (BR) | RHODE ISLAND (BR, myRCRAid) |
| CALIFORNIA (myRCRAid) | MINNESOTA (BR) | SOUTH DAKOTA (BR, myRCRAid) |
| COLORADO (BR, MyRCRAid) | MISSOURI (BR) | TRUST TERRITORIES (BR, myRCRAid) |
| CONNECTICUT (BR, myRCRAid) | MONTANA (BR, myRCRAid) | UTAH (BR, myRCRAid) |
| DELAWARE (BR) | NAVAJO NATION (BR, myRCRAid) | VERMONT (BR, myRCRAid) |
| FLORIDA (BR) | NEBRASKA (MyRCRAid) | VIRGIN ISLANDS (BR, myRCRAid) |
| GEORGIA (myRCRAid) | NEW MEXICO (BR, myRCRAid) | VIRGINIA (myRCRAid) |
| GUAM (MyRCRAid) | NEWYORK (myRCRAid) | WEST VIRGINIA (BR, myRCRAid) |
| HAWAII (BR, myRCRAid) | NORTH CAROLINA (BR, myRCRAid) | WYOMING (BR) |
| IDAHO (BR) | NORTH DAKOTA (myRCRAid) | |

REINFORCING THE BASICS: REGISTRATION

e-Manifest

- All receiving facilities must have an EPA ID regardless of whether they are using paper or electronic manifests after June 30, 2018.
 - Facilities may need to complete EPA's Site Identification form (EPA Form 8700-12) to obtain an EPA ID from their state or EPA Region.
- Transporters generally have EPA IDs already; however, they will need one if they wish to sign manifests electronically in e-Manifest.
- Generators need an EPA ID only if they wish to create and sign electronic manifests, to view their manifests on the system, or participate in correcting a manifest post-receipt to the e-Manifest system.

LATEST E-MANIFEST NEWS

e-Manifest

- Revised and updated JSON schema on GitHub
 - Section 16: Import Functionality
 - Section 18: Discrepancy/Rejection/Residue
 - PCB Manifest upgrade.
- Posted 80+ FAQs on GitHub
 - <https://github.com/USEPA/e-manifest/blob/master/Reference/eManifestFAQsMarch2018.pdf>
- API Technical Workshop held on March 19
- e-Manifest featured on ABC & News Channel 8's *Government Matters*

EPA'S TO DO LIST

e-Manifest

- ❑ Announce final user fees
- ❑ Obtain OMB approval for the new 5-copy manifest form and share with registered printers
- ❑ Post instructions for how to send paper manifests to EPA
- ❑ Obtain "Authority to Operate" for e-Manifest system -- needed to receive live data and register users for the e-Manifest application
- ❑ Complete information on user registration
- ❑ Continue to collect, respond, and distribute FAQs
- ❑ Complete and distribute Fact Sheets
- ❑ Communicate, communicate, communicate!
- ❑ Launch system on June 30, 2018!

STATES' TO DO LIST

e-Manifest

- ❑ For states that have opted in to either myRCRAid or Biennial Report, continue approving Site Managers
- ❑ Issue EPA IDs for receiving facilities that don't yet have one
- ❑ Prioritize adoption of the e-Manifest rules, including 2017 user fee final rule, the 2014 One Year rule, and (in some cases) the 2005 Uniform Manifest Revisions rule.
- ❑ Determine how state tracking systems will link with and receive data from e-Manifest.
- ❑ Assist with communications to regulated community
 - ❑ Post links to EPA's e-Manifest site on state websites
 - ❑ Share Fact Sheets, FAQs, etc., with regulated community as they come available

INDUSTRY'S TO DO LIST

e-Manifest

- Where and when available, register at least two Site Managers for RCRAInfo's industry application
- For receiving facilities, obtain an EPA ID (if you don't already have one)
- If you have an EPA ID, ensure the information you submitted to either your state or EPA Region is up-to-date
- Prepare to phase-out old manifest forms by June 30, 2018
- Otherwise prepare to transition to e-Manifest, including updating industry processes, systems as needed, such as obtaining portable devices.

- ***How long will EPA's e-Manifest system keep manifest data?***

Indefinitely.

- ***How soon after completing a manifest do I need to submit that manifest to EPA?*** Within 30 days for paper manifests (electronic manifests, of course, are submitted instantaneously).

- ***I'm a broker. What will e-Manifest allow me to do and how do I register?***

- A broker may prepare manifests in e-Manifest for its generator clients.

- EPA requires that brokers obtain an EPA ID Number using the Site ID Form (EPA Form 8700-12).

- A broker may not sign manifests in e-Manifest on behalf of generator clients, unless the broker is operating at the generator site and can sign the manifest as an offeror of the waste shipment.

- ***Will EPA be collecting any other documents besides the manifest form and continuation sheets? For example, will EPA collect the notification associated with the land disposal restriction (LDR) regulations?***
No.
- ***Can I use paper manifests after June 30, 2018, or must all manifests be electronic after this date?***
Yes, you can use paper manifests after June 30th.
- ***Is e-Manifest accessible on mobile devices, like a tablet or smart phone?***
Yes.

- ***What if a state receives a manifest form that should have gone to EPA?***

EPA will coordinate to the extent feasible with states that have received misdirected manifest copies; however, ultimate responsibility lies with the receiving facilities, who are required by regulation to submit manifests to EPA.

- ***What are the specific changes to the manifest form for use after June 30, 2018?***

The changes to the manifest form that will be required to be used after June 30, 2018, are:

- Change from 6-part form to a 5-part form, resulting from the replacement of two copies that were previously earmarked for distribution to states with one copy to be submitted to the e-Manifest system.
- The copy distribution notation on Page 1 and instructions updated to require the receiving facility to submit this copy to the e-Manifest system,

- ***Will the e-Manifest requirements apply to Very Small Quantity Generators (VSQGs) who ship their waste to a Large Quantity Generator (LQG) for consolidation?***

In the recently promulgated Generator Improvements Rule, EPA codified a provision to allow VSQGs to ship their hazardous waste off-site to an LQG for consolidation if the VSQG and the LQG are under the control of the same person, and the VSQG complies with specific conditions for marking its containers. Under this federal rule, VSQGs are not required to use a RCRA manifest to track these shipments and thus these shipments are not subject to e-Manifest requirements.

- ***Will e-Manifest include state hazardous waste codes (in addition to federal hazardous waste codes)?***

Yes. States have provided this information to EPA and it is available in the system.

- ***Can a user create and save a template in e-Manifest? For example, for repeat shipments? In other words, will e-Manifest allow me to create several manifests with the same information at one time or will I need to create them individually?***

Yes. This functionality will be available; users can simply use the copy manifest icon on the e-Manifest dashboard.

- ***Does each person need to register for e-Manifest? Or can there be one company account shared by multiple users?***

Yes, each person needs their own account in order to create and sign manifests.

- Submit input/questions to eManifest@epa.gov
- Participate in our monthly webinars
- To subscribe to the general program Listserv. Send a blank message to: eManifest-subscribe@lists.epa.gov
- To subscribe to the developers only Listserv send a blank message to: e-manifestdev-subscribe@lists.epa.gov
- Visit the program web site: <http://www.epa.gov/e-manifest>