



e-Manifest - Lessons Learned



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

10/5/2012

- Hazardous Waste e-Manifest Establishment Act

2/7/2014

- One Year Rule

10/5/2015

- e-Manifest System Due Date

4/16/2016

- E-Manifest Advisory Committee

1/3/2018

- Fee Rule

6/27/2018

- EPA Releases Final Fee Structure

6/30/2018

- Ready, Set...Go!

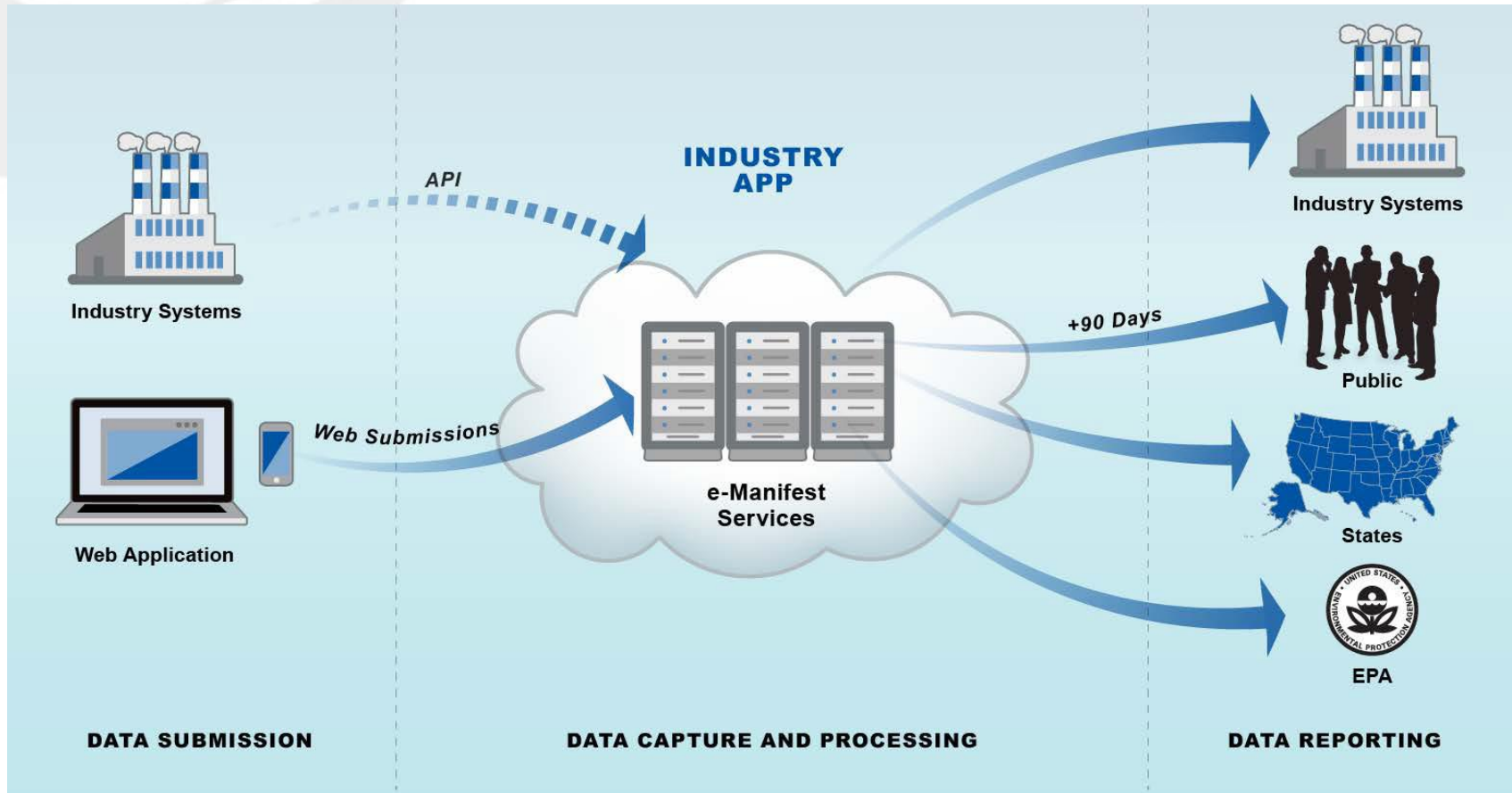
7/17/2018

- Mailing Address Published for Paper Submissions

12/7/2018

- PHMSA allowance for electronic signatures

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

Manifest Submission Type	Fee per Manifest
Mailed in Paper Manifest	\$15.00
Scanned Image Upload	\$10.00
Data + Image Upload	\$6.50
Fully Electronic Manifest	\$5.00

- 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 Manger
- 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

[My Sites](#)
[Requested Site IDs 0](#)
[Pending Requests 1](#)

My Sites

 Show entries

 Search:

Site ID	Site Name	Address	City	State	County	Status
INR000125641	EQ INDUSTRIAL SERVICES INCORPORATED	2650 N. SHADELAND AVE	INDIANAPOLIS	IN	MARION	Active
MIK939928313	EQ TRANSFER AND PROCESSING	2000 E FERRY ST	DETROIT	MI	WAYNE	Active
MID000724831	MICHIGAN DISPOSAL INC	49350 NORTH I94 SERVICE DRIVE	BELLEVILLE	MI	WAYNE	Active
MID074259565	US ECOLOGY MICHIGAN INC	6520 GEORGIA ST	DETROIT	MI	WAYNE	Active
MID048090633	WAYNE DISPOSAL INC	49350 N I94 SERVICE DR	BELLEVILLE	MI	WAYNE	Active
NVD048946016	US ECOLOGY INC RADIOACTIVE WASTE SITE	HWY 95 11 MI S OF	BEATTY	NV	NYE	Active
NVT330010000	US ECOLOGY NEVADA, INC	HWY 95 11 MI S OF BEATTY	BEATTY	NV	NYE	Active
VA988177803	HEATING AND OIL	144 FIRST STREET	FREDRICKSBURG	VA	FAIRFAX	Active
VATEST000001	TEST TRANSPORTER 1 OF VA	2777 SOUTH CRYSTAL DRIVE	ARLINGTON	VA	ARLINGTON	Active
VATEST000002	TEST TRANSPORTER 2 OF VA	2777 S CRYSTAL DRIVE	ARLINGTON	VA	ARLINGTON	Active
VAD000532119	TEST TSDf OF VA	123 MAIN ST	ARLINGTON	VA	ARLINGTON	Active

Showing 1 to 11 of 11 entries

[Previous](#) [1](#) [Next](#)
[Add Existing Site](#)
[Request Site ID](#)

US ECOLOGY MICHIGAN INC **6520 GEORGIA ST - DETROIT** **MID074259565**

- Site Details
- Biennial Report
- e-Manifest

General Overview [How do I edit Site Information?](#)

Federal Generator Status Large Quantity Generator	State Generator Status Large Quantity Generator - Generates gt 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 [How do I edit Site Information?](#)

6520 GEORGIA ST
DETROIT, MI 48211

Map

Map Satellite

Map data ©2019 Google Terms of Use

US ECOLOGY MICHIGAN INC

6520 GEORGIA ST - DETROIT

MID074259565

[Site Details](#)
[Biennial Report](#)
[e-Manifest](#)

 View: Incoming
[Create New Manifest](#)
[Upload Paper Manifest](#)
[Sign Manifests](#)

In Progress

 Show 10 entries



Manifest ID#	Generator ID	Generator Name	Last Updated Date	Status	Actions
100026107ELC	INR000125641	EQ INDUSTRIAL SERVICES INCORPORATED	01/29/2019 07:31 PM	Pending	
UNASSIGNED	MID074259565	US ECOLOGY MICHIGAN INC	08/08/2018 08:27 AM	Draft	
100024241ELC	VA988177803	HEATING AND OIL	07/09/2018 11:45 AM	Pending	
100024098ELC	NC0000942144	SHAMROCK ENVIRONMENTAL CORP	06/28/2018 05:53 PM	Pending	

Showing 1 to 4 of 4 entries

Previous 1 Next

Received

What Are The Current Struggles?

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- Who's manifest gets to EPA first
- No notifications
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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 RCRIInfo.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>
- FAQs about e-Manifest: <https://github.com/USEPA/e-manifest/blob/master/Reference/eManifestFAQsMarch2018.pdf>
- Updates on e-Manifest: <https://www.epa.gov/e-manifest/monthly-update-hazardous-waste-electronic-manifest-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-suscribe@lists.epa.gov
- Questions or Comments:
 - Brian Lindman – 303-818-5456 or brian.lindman@usecology.com



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