e-Manifest

Launching June 30, 2018

June 13, 2018

Agenda

- Background

- How to Prepare

- Continued New York State Requirements

- How the System Works

- Further Information & Contacts

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Background

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e-Manifest System

- October 5, 2012 – **Hazardous Waste Electronic Manifest Establishment Act** – authorizes EPA to implement an national e-Manifest System

- February 7, 2014 - **"One Year Rule"** – establishes legal and policy framework for the e-Manifest system

- December 20, 2017 – **"User Fee Rule"** – gives EPA discretion to establish user fees to off-set costs and ensure that e-Manifest is self-funded.

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e-Manifest Act

- Mandate to establish national IT system funded with user fees

- Scope: All federal or state regulated wastes subject to manifest

- Users may *elect* to use electronic or paper manifests

- Agency given discretion to set reasonable fees to recover costs

- Consistent implementation in all states on effective date

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e-Manifest Benefits

- Cost savings and paperwork burden reductions

- Accurate, more timely information on waste shipments

- Creation of a single hub for reporting of manifest data

- More effective compliance monitoring by regulators

- Potential to integrate with RCRA BR and state systems

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Key Points

- National system that will "go live" on **June 30, 2018**

- EPA will run the system – users, including states, will be able to access the system and manifest data

- Some parts of the system will continue to be developed after June 30th.

- Paper manifesting will still be allowed, however the cost will be higher than using electronic; new paper manifest form.

- Receiving Facilities are responsible for paying fees

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How to Prepare

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How To Prepare – Stay Informed

- Attend EPA webinars:

- Webinars are announced through EPA's e-Manifest and e-Manifest Developers Only listservs

- Copies of slides from past webinars https://www.epa.gov/e-manifest/monthly-webinars-about-hazardous-waste-electronic-manifest-e-manifest

How To Prepare – Stay Informed Cont.

- Read the material available at EPA's e-Manifest web page: www.epa.gov/e-Manifest, especially the "**Frequently Asked Questions**" section

- Communication between Generators, Transporters, and Receiving Facilities is *highly recommended* – decide who will be responsible for creating the new manifests and whether paper, hybrid, or electronic manifests will be used

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How to Prepare – Site Info & ID Numbers

- Verify your site information using RCRAInfo Web:
  https://rcrainfo.epa.gov/rcrainfoweb/action/modules/hd/handlerindex

- **Site ID numbers** – **EPA Region 2** issues the numbers for New York handlers

  - Numbers are assigned to a site's *physical location*

  - SQGs, LQGs, Receiving Facilities, and Brokers are required to have an EPA ID number to use e-Manifest.

  - EPA ID numbers beginning with "NYP" or "NYN" **should not** be used as the permanent EPA ID number for site in e-Manifest system

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How to Prepare – Receiving Facilities

- Obtain or verify EPA ID number
  - **Must** have an **EPA ID Number** if receiving wastes that require a hazardous waste manifest (**federal HW, <u>state-only HW</u> [generator or receiving state], etc.**)
- Obtain **RCRAInfo Industry Application account**
- Obtain a **Pay.gov account**
- Will be required to submit all final manifests to e-Manifest system

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How to Prepare – Receiving Facilities Cont.

- Will pay fees – billed by EPA on a monthly basis

Year 1 Estimated Fees by Manifest Type (2017$)		
Manifest Submission Type		Year 1 Fee (Estimated)
Paper Manifest Types	Mailed Paper	$20.00
	Image Uploads	$13.00
	Data File Uploads	$7.00
Electronic Manifests (includes hybrid)	Electronic	$4.00

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How to Prepare - Transporters

- Obtain or verify EPA ID number

- Identified in RCRAInfo as a *Transporter of Hazardous Waste* *(box 11.1.a. on EPA Form 8700-12, RCRA-C Notification)*

- Obtain a **RCRAInfo Industry Application account** – needed to access and sign **hybrid** or **electronic** manifests using system software

- Communicate with Generators and Receiving Facilities

- EPA has said signing electronic manifests "on behalf of" a Generator will not be available until this summer, after launch

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How to Prepare - Generators

- Obtain or verify EPA ID number if SQG or LQG
- Obtain a **RCRAInfo Industry Application account** - needed to access and sign **electronic** manifests through EPA's system, or if using the system to meet manifest recordkeeping requirements.
- Communicate with Transporters and Receiving Facilities
- All-electronic systems will require internet connectivity.

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How to Prepare - Brokers

- Obtain an EPA ID number.

- Identified in RCRAInfo as an **e-Manifest Broker**
  (box 17 on EPA Form 8700-12, RCRA-C Notification)

- Obtain a **RCRAInfo Industry Application account** - needed to prepare and access and **hybrid** and **electronic** manifests through EPA's system, or using the system to meet manifest recordkeeping requirements.

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How to Prepare – Brokers Cont.

- Communicate with Generators, Transporters, and Receiving Facilities

- Use of **electronic** and **hybrid manifests** will require internet connectivity

- Broker functionality **will not** be available at launch. (Available Summer 2018, per EPA)

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How To Prepare – Test

- **Testing (optional)** – use the test system to get used to how e-Manifest works; provide feedback to EPA

- Register for RCRAInfo test account as an "Industry User": https://rcrainfopreprod.epa.gov/rcrainfo/action/secured/login

  - *Note: test ("preprod") accounts **will not work** with the final system. Anyone who wants to use the final system will be required to register for a RCRAInfo ("prod") account as an **"Industry User**" in the RCRAInfo production system*

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Continued New York State Requirements

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New York State DEC Will Continue to Require

- Use of all applicable state hazardous waste codes:
  - Hazardous Waste Codes For PCBs **(B001-B007)**
  - Ultimate Disposal Method Codes **(L, B, R, T)**
- If you use a **paper**, **hybrid**, or **export manifest**, submit a copy of the generator copy to DEC
  - *Copies of electronic manifests (all-electronic from generator to receiving facility) do not need to be submitted to DEC*

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How the System Works

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Overview

- e-Manifest is part of the RCRAInfo system

- e-Manifest will have the ability to track manifests for all federal and state-only hazardous wastes.

- Waste that is required to be shipped using hazardous waste manifest in either the **generator** or **receiving state**, **must** be submitted to e-Manifest (**state-only wastes, CESQG, HHW**)

- Users of the system will be required to have an EPA ID number to use **electronic manifests**.

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Types of Manifests

- There are three types of manifests:
  - **Paper** - Generator, Transporter, and Receiving Facility all sign on paper
  - **Hybrid** - starts as a paper manifest signed by the Generator and then is signed electronically by the Transporter and Receiving Facility
  - **Electronic** - created in e-Manifest and electronically signed by all entities listed on the manifest

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Who Needs to Register?

- **Generators**
  - Using **electronic manifests** (not required for paper)
  - Using e-Manifest for recordkeeping for **hybrid** or **electronic manifests**
- **Transporters**
  - Using **electronic** or **hybrid manifests** (not required for paper)
  - Using e-Manifest for recordkeeping for **hybrid** or **electronic manifests**
- **Receiving Facilities**
  - **All** required facilities **must** register with **e-Manifest** and **Pay.gov**

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How to Register

- Each **person** (user) must register for their own RCRAInfo account, **sharing of user accounts is not allowed**.

- Users will register for e-Manifest in RCRAInfo "prod" here: https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login

- Users should use work email address and full legal name when registering for an account

- Handlers should register as **"Industry Users"**

- Each user can request access one or more sites.

Site Permissions

- After registering for an account, users must request access to their company's site(s) and request site permissions
- **Viewer** - Can only view submissions made by other users, **cannot sign**
- **Preparer** - Can only prepare submissions, **cannot sign**
- **Certifier** - Can prepare, electronically sign and submit info
- **Site Manager** - Can prepare, electronically sign and submit info.
  - Manages other user(s) for the site (approve, deny, modify permissions).
  - Site Manager user should gain access before other users request access.
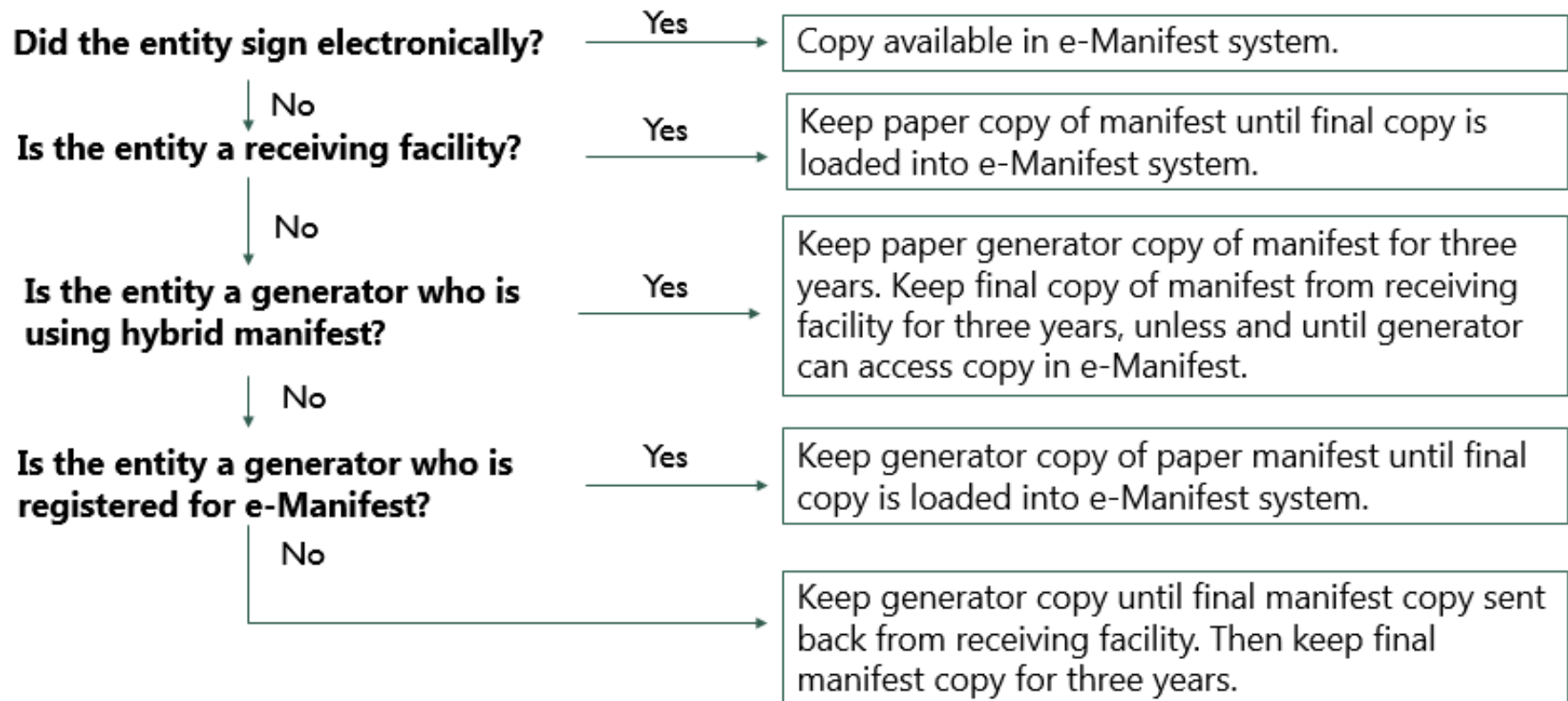 - For **Receiving Facilities**, the Site Manager must manage and **pay e-Manifest bills**.

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Submitting Manifests to EPA

Once e-Manifest goes live, *Receiving Facilities* will have a variety of options for submitting manifests to EPA, including:

- **Typing** and **Submitting manifests directly in the e-Manifest system** (*i.e.*, **electronic** and **hybrid** manifest)
- **Uploading manifest data + scanned image**
- **Uploading a PDF scanned image** of a manifest
- **Mailing in a hard copy manifest**

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Access to Manifest Records in e-Manifest

Did the entity sign electronically? — Yes → Copy available in e-Manifest system.

No ↓

Is the entity a receiving facility? — Yes → Keep paper copy of manifest until final copy is loaded into e-Manifest system.

No ↓

Is the entity a generator who is using hybrid manifest? — Yes → Keep paper generator copy of manifest for three years. Keep final copy of manifest from receiving facility for three years, unless and until generator can access copy in e-Manifest.

No ↓

Is the entity a generator who is registered for e-Manifest? — Yes → Keep generator copy of paper manifest until final copy is loaded into e-Manifest system.

No → Keep generator copy until final manifest copy sent back from receiving facility. Then keep final manifest copy for three years.

e-Manifest Additional Facts

1. Public module will not disclose certain information from manifests that include Chemicals of Interest per Dept. of Homeland Security regulations

2. Receiving facilities cannot mail paper forms to EPA after three years (phase out of mailed-in paper manifests)

3. Data publicly disclosed after 90 days post-receipt

4. Corrections can be made at anytime by interested parties

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Further Information & Contacts

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e-Manifest EPA Web Links

e-Manifest: https://www.epa.gov/e-manifest

FAQs: https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest

EPA e-Manifest Webinar Slides:

https://www.epa.gov/e-manifest/monthly-webinars-about-hazardous-waste-electronic-manifest-e-manifest#upcoming

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e-Manifest EPA Web Links Cont.

RCRAInfo (production-final system):
https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login

RCRAInfo (preproduction-testing):
https://rcrainfopreprod.epa.gov/rcrainfo/action/secured/login

RCRAInfo Web (verify site info):
https://rcrainfo.epa.gov/rcrainfoweb/action/modules/hd/handlerindex

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e-Manifest – EPA Contacts

Federal Questions and Requirements

EPA e-Manifest email: eManifest@epa.gov

EPA Region 2 phone number: **(212) 637-4106**

e-Manifest Listservs (send a blank email to subscribe)**:**

General: eManifest-subscribe@lists.epa.gov

Developers Only: e-manifestdev-subscribe@lists.epa.gov

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e-Manifest – New York Contacts & Links

New York Questions and Requirements

Manifest email: manifest@dec.ny.gov

DEC e-Manifest webpage:

https://www.dec.ny.gov/chemical/112876.html

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Thank You

Thomas Killeen, PE

Chief, RCRA Compliance and Technical Support Section

Bureau of Hazardous Waste & Radiation and Management

NYSDEC

625 Broadway,

Albany, NY 12233-7256

Thomas.Killeen@dec.ny.gov

(518) 402-9674

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