



# EPA's E-Manifest Rollout: Things to know prior to June 30, 2018

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# Summary of upcoming manifest changes

- As of today, EPA never has systematically collected hazardous waste manifests (although some states have), nor have we collected manifest user fees (as some states have), nor do we have a way for generators, transporters and TSDFs to transfer manifest data between themselves and EPA electronically.
- These all change June 30, 2018:
  - Mandatory: facilities that receive waste requiring manifesting will be required to submit manifests to EPA - EPA will go from collecting zero manifests to collecting all manifests, i.e., an estimated 3-5 million per year.
  - Mandatory: EPA will charge receiving facilities one of four fees for all paper and electronic manifest submissions, depending on how they are submitted.
  - Optional: EPA has created an e-Manifest system to allow generators, transporters and disposers to transfer manifest data electronically among themselves and EPA.



# Summary of changes, continued

- Use of e-Manifest system is optional on and after June 30. Paper manifests can be used on and after June 30 for an estimated three additional years, although user fees will be higher for use of paper manifests.
- EPA is creating a database now to capture the data from all manifests. Electronic manifest data submissions will flow directly into this database, and EPA will transcribe all paper-manifest data into this database.
- For those who wish to continue to use paper manifests, EPA is creating a new five-part form to replace the existing six-part form. No new data are required on the form but the instruction on submitting the copies of the form to the various receivers has changed. EPA gets the top copy of the paper form and copies no longer need to go to the sending or receiving state.



# Summary, continued

- To access the e-Manifest database, a person must register individually for system access, and then request and be granted permission to access a site's data on a site-by-site (i.e., EPA ID #) basis.
- Having access to the database has the advantages of allowing one to:
  - create and sign an electronic manifest for their site,
  - view previous manifest submissions for their site, and/or
  - make corrections to manifests previously submitted for their site.
- E-Manifest database registration is not required for those submitting paper manifests.
- E-Manifest data will be available to the public 90 days or sooner after receipt of manifest data.



## More summary

- All receiving facilities must have an EPA ID number on and after June 30 regardless of whether they are using paper or electronic manifests. In other words, any facility that receives state-only manifested waste and which is not also a permitted TSDF will need an EPA ID # as of June 30.
- Handlers who currently are not required to have an EPA ID # (i.e., some generators, transporters, brokers and others) will need to get an EPA ID if they wish to get an account to access the e-Manifest database.
- EPA has created a “test” (a/k/a “preproduction”) version of the e-Manifest database that is available now for testing.



# Who must submit manifests to EPA?

- As of June 30, it is the responsibility of the receiving facilities to submit manifests to EPA, either in paper or electronically, when:
  - they receive waste that must be manifested under federal law, including RCRA haz waste, regulated PCB waste shipped on a manifest, and imported haz waste; or when:
  - they receive “state-only” waste that must be manifested under the rules of the state in which the waste was generated or received.
- Exceptions:
  - Manifests for haz waste exports currently are not included in e-Manifest rules and do not need to be submitted to EPA as of now.
  - Non-manifest documents (e.g., LDR notices) don’t need to be submitted.



# Options for submitting manifests

- On and after June 30, receiving facilities will have several options for submitting manifests to EPA, including:
  - Receive a paper manifest and mail it to EPA, who will enter the data into the e-manifest database. (Which EPA will bill at an estimated \$20.)
  - Receive a paper manifest and upload an image of it into EPA's database for EPA to do data-entry. (Which EPA will bill at an estimated \$13.)
  - Receive a paper manifest, and either enter data directly into EPA's database, or enter data into receiver's database and then flow data to EPA via API, and upload an image of manifest also. (Which EPA will bill at an estimated \$7.)
  - Receive an electronic (incl. hybrid) manifest, sign it electronically and send it to EPA's database. (Which EPA will bill at an estimated \$4.)



# What is a “hybrid” manifest?

- It's a manifest that allows the transporter to initiate an electronic manifest in EPA's e-Manifest database for their generator customers who are not participating in e-Manifest, i.e., don't have an e-Manifest account.
- To qualify as a hybrid manifest, the first transporter must create an electronic manifest in the database and then print it out, where it is signed on paper by the generator (just like a regular paper manifest). The rest of the manifest transaction is then electronic, including electronic signatures by the initial transporter and all subsequent entities.



# Estimated fees for manifest submissions

<b><i>YEAR 1 MARGINAL COST-PER-MANIFEST EST. BY MANIFEST TYPE (2017\$)</i></b>		
<b><i>WHEN RECEIVER RECEIVES:</i></b>	<b><i>AND THEN DOES THIS:</i></b>	<b><i>THE FEE IS (EST.)</i></b>
an electronic manifest (incl. hybrid)	passes electronic data to EPA	\$4
a paper manifest:	enters data into database + uploads image of manifest	\$7
	uploads image only	\$13
	mails paper manifest to EPA	\$20



# How do I test the e-Manifest database?

- To test e-Manifest now, you will need an account for EPA's "test" (a/k/a "preproduction") version of the database.
- To learn how to test the database, see: <https://www.epa.gov/e-Manifest/how-participate-testing-hazardous-waste-electronic-manifest-system-system-e-Manifest>
- Note that people must register separately for access to the test/preprod version of e-Manifest and to the "production" version when it becomes available in late May/early June 2018.
- That is, having an account to the "test" database does NOT give you access to the production version of e-Manifest, and vice versa.



# Account registration

- To be able to use the e-Manifest application (either production or preproduction), a person must first “register” for an account.
- Once registered, a person must request and receive access for each site for which he/she needs to submit, prepare and/or view manifest data. For these purposes, a “site” is a facility that has or should have a unique EPA ID number.
- EPA has created four levels of account access for the e-Manifest application: viewer, preparer, certifier, and site manager. When a person requests site access, he/she requests access to serve in one of these four roles.



# Account access roles

- “Viewer” is the 1st level of access: viewers only can view data entered or forms prepared by others for that site.
- “Preparer” is the 2nd level of access: preparers can view existing data and forms as well as enter data and prepare forms for submission. But preparers cannot submit forms or data for that site.
- “Certifier” is the 3rd level of access for a site: certifiers can electronically sign and submit forms to EPA, as well as view and prepare forms.
- “Site Manager” is the highest level of access: he/she can view, prepare, certify/sign and submit forms to EPA, and also approve viewers, preparers, certifiers, and other site managers for that site.



# Site managers are key

- Sites can begin site manager registration now.
- EPA recommends that only one person initially apply to EPA or the state to be a site manager for a given site.
- There's no need initially for additional people to apply to EPA or a state for access for any viewers, preparers, certifiers or additional site managers for a given site, because once EPA or the state approves that first site manager for a given site, the approved site manager can approve other site managers and any certifiers, preparers and viewers as it needs for that site into the future, without EPA or state involvement.
- If a person already is approved as a site manager for use of the myRCRAid or Biennial Report industry application for a given site, that person already will have site manager access for that site in the e-Manifest production database.
- However, note that this access transfer does not extend to certifiers, preparers, or viewers, who must register independently for each industry application.



# What EPA needs to finish before 6/30/18

- Finalize and announce user fees.
- Complete guidance on user registration.
- Post instructions for sending paper manifests to EPA.
- Release full functionality for site managers, i.e., the ability for site managers to approve other site managers, certifiers, preparers and viewers in their organization.



# What industry can do now

- Get a site manager approved by EPA or a State for each site, and then designate any additional site managers, certifiers, preparers and viewers needed for that site (once EPA releases that functionality).
- For receiving facilities, obtain an EPA ID if you don't already have one.
- If a site has an EPA ID, ensure your site data is up-to-date in RCRAInfo.
  - To do so, look up your EPA ID on the public version of the RCRAInfo database located on EPA's "Envirofacts" website. (Google "EPA envirofacts")
  - Click on the "RCRAInfo" link, enter your ID, and ensure your site data is up-to-date.
- Transition to new manifest forms; if using old manifest forms, you can cover up inaccurate instructions on those forms with accurate instructions.
- Update internal SOPs as needed.
- Procure portable devices if desired.



# EPA Regional e-Manifest contacts

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# Contact EPA and stay informed

- Visit EPA's e-Manifest website: <http://www.epa.gov/e-Manifest>
- Read EPA's 80+ question FAQ document at <https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest>
- Read EPA's six industry sector-specific fact sheets at <https://www.epa.gov/e-manifest/fact-sheets-e-manifest-stakeholders>
- Submit input/questions by email to EPA at [emanifest@epa.gov](mailto:emanifest@epa.gov)
- Participate in EPA's monthly industry webinars.
- To subscribe to EPA's general e-Manifest Listserv: send a blank email to: [eManifest-subscribe@lists.epa.gov](mailto:eManifest-subscribe@lists.epa.gov)
- To subscribe to the developers-only Listserv: send a blank email to: [e-Manifestdev-subscribe@lists.epa.gov](mailto:e-Manifestdev-subscribe@lists.epa.gov)



# EPA Region 5 contact information

[www.epa.gov/e-manifest](http://www.epa.gov/e-manifest)

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