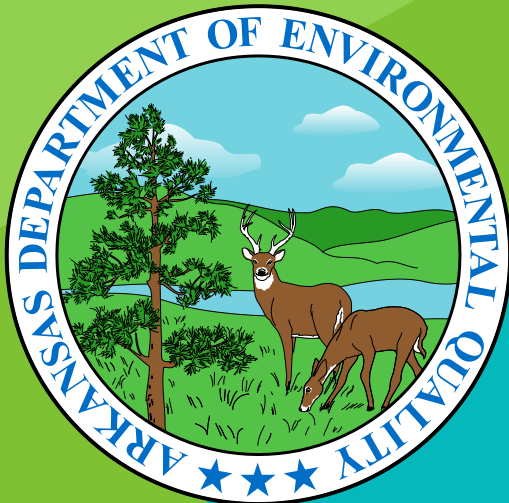# The e-Manifest System

Penny J. Wilson
Compliance Branch Manager
Office of Land Resources

# Agenda

- Overview
- Process (assigning Site Managers)
- Fees/Payments
- Generators
- Transporters
- Receiving Facilities/TSDFs
- Helpful Links

# Overview

- Established by the Hazardous Waste Electronic Manifest Establishment Act **enacted October 5, 2012**

- e-Manifest launched nationwide on: **June 30, 2018**

# Overview

- <u>Receiving facilities/TSDFs</u>:

  - Must submit to EPA all hazardous waste manifests in paper form or electronically
  - Existing 6-copy manifest will be replaced with a 5-copy form. Effective June 30, 2018
  - An associated fee for each manifest is charged to the receiving facilities/TSDFs only

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# Process

- Affects any regulated waste shipped on a manifest, to include:

  - RCRA federal hazardous waste
  - Regulated PCB waste
  - State-regulated hazardous waste
  - VSQG waste (CESQG) (in Arkansas)
  - Imported hazardous waste

# Process

- Receiving facilities/TSDFs are required to register for e-Manifest to submit manifests electronically and correct mistakes
- Receiving facilities/TSDFs must assign Site Managers to manage data and pay invoicing
- e-Manifest data will be available to the public 90 days post-receipt of a manifest submittal

# Fees

| Manifest Submission Type | Fee per Manifest * |
|---|---|
| Mailed in Paper Manifest | $15.00 |
| Scanned Image Upload | $10.00 |
| Data + Image Upload | $6.50 |
| Electronic Manifest (Fully Electronic & Hybrid) | $5.00 |

\* These user fees are for fiscal years 2018/2019  *(June 30, 2018 through September 30, 2019)*

NOTE:  Generators and transporters do not have to submit manifests to EPA

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# Fees

- Receiving facility/TSDF:
  - must have Site Manager (SM) permissions set up in RCRAInfo.
  - SMs must complete an electronic signature agreement (ESA) during the first log-in.
- SMs are able to receive and pay invoices.
- Fees are based on manifest activity during the previous month.

# Payments

- SMs will pay invoices in e-Manifest by clicking on the "Pay Bill" button.
- This allows the SMs to make a payment directly to Pay.Gov.
- Forms of payment accepted:
  - Commercial Credit Card;
  - Commercial Debit Card; or
  - Automated ClearingHouse (ACH) Debit Card.

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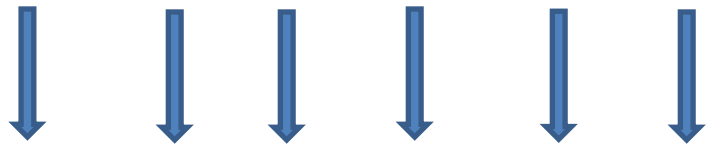Department of Environmental Quality

# Payments

Checks or any other forms of payment sent directly to the EPA will not be accepted

# Late Fees/Sanctions

- Invoice must be paid within the calendar month received to avoid late fees
- Late fees include monthly handling charge and penalty for each month your bill remains unpaid
- All unpaid fees over 120 days will be forwarded to the Treasury Department for collections and possible enforcement action

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# EPA Address to send Paper Manifest

<u>Receiving facility/TSDF</u> mails paper manifest and continuation sheets to:

**EPA e-Manifest PPC**

**14295 Park Meadow Drive 5th Floor**

**Chantilly, VA  20151**

# Generators

- <u>To use or view e-manifest:</u>
  - Must have an EPA ID Number
  - Site information must be up-to-date
  - Must complete registration with e-Manifest system to view generator manifests and fix corrections
- <u>Generators without e-Manifest account:</u>
  - **Will be required to obtain copies of completed manifests as required in APC&EC Regulation No. 23 Section 262**

# Generators

- Work with Receiving facility/TSDF to select manifest creation option.
  - paper, hybrid, or electronic
- Generator Site ID form must be up-to-date
- EPA prefers that at least two (2) SMs be registered for RCRAInfo's Industry application

# Generators

- Generators can still use transporters, brokers, or receiving facilities to prepare manifests for them
- If a generator's shipment is rejected by receiving facility, the receiving facility is still required to pay the user fee

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# Transporters

- Have the option of preparing electronic manifests for their generator clients

- Transporters will still need to carry one printed copy of the manifest in the transport vehicle (DOT requirement)

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# Transporters

- Must work with customers to determine which option is suitable, electronic or paper
- Two (2) ways Transporters can create e-Manifests:
  - EPAs web service; or
  - API (Application Programming Interface)

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# Transporters

- If using the e-Manifest system:

    – Must have an EPA ID number

    – Must register with e-Manifest

    – EPA encourages transporters to register at least 2 Site Managers

# Brokers

- Can prepare manifests in e-Manifest for generator clients
- Must first obtain an EPA ID number
- Brokers cannot sign manifests "on behalf of" the generator unless operating at the generator site and acts as an offeror of the waste shipment

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# Receiving Facilities/TSDFs

- Must have an EPA ID number

- Must register for e-Manifest

- Can use existing 6-copy stockpile of manifest forms but must send top copy to EPA

- Paper manifests must be submitted within 30 days of receipt

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# Receiving Facilities/TSDFs

- Ways to submit manifests to EPA:
  - Electronic submissions
    - Using system web service or an API
  - Paper submissions
    - U.S. Mail
    - Image file upload
    - Data file + image upload

# Receiving Facilities/TSDFs

- Keep in mind:

**The option of mailing paper manifests to the EPA system expires on June 30, 2021**

# Receiving Facilities/TSDFs

- <u>EPA Granted initial Flexibility</u>
  - EPA granted facilities extra time to submit paper manifests during initial months
  - For paper manifests received between 6/30/18 and 9/1/18 submission was deferred until **September 30, 2018**
  - For paper manifests received after 9/1/18, facility must submit e-manifest within 30 days of receipt

# Helpful Links

- e-manifest home page:
  - [https://www.epa.gov/e-manifest](https://www.epa.gov/e-manifest)
- e-manifest user registration:
  - [https://www.epa.gov/e-manifest/e-manifest-user-registration](https://www.epa.gov/e-manifest/e-manifest-user-registration)
- Submitting a hazardous waste manifest to the system:
  - [https://www.epa.gov/e-manifest/how-submit-hazardous-waste-manifest](https://www.epa.gov/e-manifest/how-submit-hazardous-waste-manifest)

# Helpful Links

- e-manifest FAQs:
    - https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest
- Register for RCRAInfo Version 6: https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login

# Helpful Links

- ADEQ e-manifest fact sheets
  - https://www.adeq.state.ar.us/hazwaste/programs/

These fact sheets include:

| | |
|---|---|
| Brokers | Receiving Facilities |
| General Public | Transporters |
| Generators | TSDFs |

# Questions???