E-Manifest Webinar Questions & Answers

Manifest Questions

When will the new five part manifest be required to be used?
You can use the 5 part as soon as they are available from the printer. However in the meantime the 6 part is acceptable for now.

Will Veolia continue to return paper copies to generators?
Veolia will continue to return manifest paper copies to generators until the EPA website is running effectively. This could take 30-60 days.

Which manifest would be scanned by the receiving company? TSD or Generator copy?
The first copy of the manifest will be scanned.

If I already have an EPA ID can I use that or do I need to get a new one?
Use your current EPA ID.

Will EPA put the delay in use in writing?
Yes, the EPA has already put a 60-day delay on their website for submitting e-Manifest to their site.

Can any employee who has basic waste training be an e-Manifest signer for the generator.
An employee signing an e-Manifest would need to have the same training as they would to sign a paper manifest. This includes RCRA hazardous waste training in addition to DOT hazardous materials training.

Does a signer for the generator have to be registered in some way for signing an e-Manifest?
In order for an employee to sign an e-Manifest, they must be registered for the generator site ID at either a Site Manager or Certifier level.

With e-Manifest, do generator requirements for having a paper copy of the signed destination copy back to the generator go away?
Generators that have registered with e-Manifest may elect to use their e-Manifest account to store and retrieve their manifest copies.

Are we required to send copies to DTSC?
From our understanding, DTSC has not changed their policy in regards to manifest submission. Veolia recommends all generators continue the practice of mailing your manifest copies to DTSC. Unless DTSC states otherwise, it's business as usual.

If 8700-12 is completed thru e-Manifest site, do we also need to update the state?
It will depend with your specific state. Contact your State for their guidelines.

Will e-Manifest allow submittal of annual hazardous waste report to individual states?
No.

Does California require a manifest copy as well?
Yes.

One of our wastes goes to Canada (Stablex). What is the e-Manifest requirement in this case?
No, exports are not required to be submitted to the EPA e-Manifest site.

Will Veolia sites continue to mail back paper return manifests?
Yes, at least for the first 30 days for now.

As we continue using paper manifest after June 30, do we need to still send a copy to DTSC?
From our understanding, DTSC has not changed their policy in regards to manifest submission. Veolia recommends all generators continue the practice of mailing your manifest copies to DTSC. Unless DTSC states otherwise, it's business as usual.

Would transfer stations also see these electronic manifests?
If you mean a 10 day in-transit you would see the e-Manifest as a pass through. The ultimate TSDF on the manifest will be responsible for submitting to the EPA site.

Will we be required to use e-Manifest when you go fully electronic?
Yes.

If you have an e-Manifest account then you will not receive the paper copy?
Correct.

When will Veolia go fully electronic?
Best guess is late 2018 to early 2019. This will also depend upon the EPA's completion of programing.

When hazardous waste manifests go fully electronic, will paper copies still be used for non-hazardous shipments?
This will be dependent on whether the state has any specific requirements for non-EPA regulated shipments.

Non Manifest Questions

What about non-hazardous wastes?
Only hazardous waste manifests apply to e-Manifest guidelines. Non-hazardous waste should not be placed on hazardous waste manifests.

Will manifest for our non-hazardous loads through Veolia be electronic now as well?
No.

Universal waste does not require e-Manifest, correct?
Correct.

We are a VSQG in Ohio, Veolia manages our HZ waste management. We currently use a paper manifest it sounded as though this is not required electronically?
Correct, however you may what to check your state requirements to see if there are any special provisions for VSQG.

Wisconsin required as special non-hazardous manifest for non-hazardous waste. The EPA e-system is not meant for this- correct?
Correct.

General Questions

What is the process for LDR forms?
The e-Manifest system will not change the process for LDR forms.

Are the Veolia technicians ready to go with this on Monday?
Yes.

Will Veolia print out LDR's?
Yes.

What about waste profiles?
The e-Manifest system will not change the process for completion of waste profiles.

Will Veolia continue to use a single receiving site before trans shipments?
There is only one destination facility identified on each manifest.

Does this change the process for notification to generator of destruction?
It should not. However we would suggest checking with your TSDF to confirm this.

Fees

Can you clarify; will fees for manifests be paid to EPA by Veolia or by Customer/Generator?
The receiving facility is responsible for paying manifest fees to EPA for all manifests they receive.

Are you charging $20 for non-hazardous manifests?
No.

Is the $20/manifest fee include the $7 e-Manifest fee?
Yes.

You stated "small generators are not required to comply with the regulation", but will we still be charged Veolia's $20 manifest fee?
Any hazardous waste manifest utilized will be charged a fee regardless of generator status. It is important to assure that hazardous waste manifests are used only if required.

If non-RCRA waste is shipped on a hazardous manifest to a Veolia facility will the fee still apply. (RCRA Exempt Waste Streams).
Yes, the conversion for Veolia's TSDF is driven by the hazardous waste manifest number.

Registration

Can a user register for multiple EPAID numbers at one time? For companies with multiple sites, this will be a big time saver.
Yes, once a user is registered with the EPA you can add additional sites based on their EPA ID #- (HM)

My company has a CDX Account for Form R Reporting purposes. Will this suffice, or do I need a separate account for e-manifest?
You will need to add the RCRAInfo program in CDX to access the e-Manifest system.

If you are registered as a site manager in CDX are you automatically a certifier.
Yes.

As a transporter, do all my driver's need to be set up as certified?
Yes, each Driver must be registered on the EPA site.

Did you say generating site MUST have more than one person trained to sign manifests?
It is recommended that each site has a minimum of two users registered as Site Managers.

How many "certifiers" allowed per site?
There is no limit to the quantity of people you have registered.

Can someone register to sign only?
Only users who have the "Certifier" permission and / or "Site Management" permission can sign once the ESA is completed and approved.

Once registered can generators sign at different sites (different EPA ID numbers or will they have to register for each site?
Each user must be registered with the EPA then you can add other locations.

If the site has multiple site managers should everyone be DOT & RCRA trained if they will be signing e-Manifest?
Yes.

Bi-Annual Report

I don't recall but will this e-Manifest process auto-populate annual/biannual hazardous waste reporting data to help to expedite reporting?
Not at the current time however the e-Manifest Act requires that EPA integrate the reporting of information in e-Manifest with the RCRA biennial report process.

Will you be able to pull data from the e-Manifest database for TRI reporting?
Not at this time.

At what level do you need to be in the e-Manifest system to submit electronic biennial reports?
These are two separate systems currently.

For more information regarding the e-Manifest visit us at veolianorthamerica.com.