

Implementing the e-Manifest

Veolia North America



Welcome and Introduction



Today's moderator:

Jim Dykhuis,
Senior Director of Marketing



Today's host:

Bob Cappadona,
President and Chief Operating Officer



Today's speakers:

Tom Baker,
Vice President EHS&T

Paul McShane,
Senior Vice President Operations

Tom Daly,
EH&S Manager

Call Agenda



- e-Manifest Rulemaking Overview
- Scope, Submission Types, Changes to Paper Form
- Fee Rule
- Recent Developments
- User Registration
- What Generators Need to Know
- Questions and Wrap Up

Why Did EPA Pursue **e-Manifest**

- Burden Reduction / Cost Savings
- Improve accuracy of waste shipment information and timeliness of information sharing
- Create single hub for one-stop reporting of manifest data
- Increased effectiveness of monitoring waste shipments by regulators
- Future integration with Biennial Reporting System

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: NYC

2. Page 1 of 2

3. Manifest Tracking Number: 000718978 VES

4. Generator's Name and Mailing Address: NEW YORK, NY 10004

5. Generator's Phone: 212 437-4657

6. Transporter 1 Company Name: MANHATTAN SAFE EVENT

7. Transporter 1 Address: NEW YORK, NY 10004

8. Transporter 1 Phone: 732 485-5185

9. Transporter 1 Address: MIDDLESEX, NJ 08846

10. Transporter 1 Phone: 732 485-5185

11. Transporter 1 Address: MIDDLESEX, NJ 08846

12. Transporter 1 Phone: 732 485-5185

13. Transporter 1 Address: MIDDLESEX, NJ 08846

14. Transporter 1 Phone: 732 485-5185

15. Transporter 1 Address: MIDDLESEX, NJ 08846

16. Transporter 1 Phone: 732 485-5185

17. Transporter 1 Address: MIDDLESEX, NJ 08846

18. Transporter 1 Phone: 732 485-5185

19. Transporter 1 Address: MIDDLESEX, NJ 08846

20. Transporter 1 Phone: 732 485-5185

21. Transporter 1 Address: MIDDLESEX, NJ 08846

22. Transporter 1 Phone: 732 485-5185

23. Transporter 1 Address: MIDDLESEX, NJ 08846

24. Transporter 1 Phone: 732 485-5185

25. Transporter 1 Address: MIDDLESEX, NJ 08846

26. Transporter 1 Phone: 732 485-5185

27. Transporter 1 Address: MIDDLESEX, NJ 08846

28. Transporter 1 Phone: 732 485-5185

29. Transporter 1 Address: MIDDLESEX, NJ 08846

30. Transporter 1 Phone: 732 485-5185

31. Transporter 1 Address: MIDDLESEX, NJ 08846

32. Transporter 1 Phone: 732 485-5185

33. Transporter 1 Address: MIDDLESEX, NJ 08846

34. Transporter 1 Phone: 732 485-5185

35. Transporter 1 Address: MIDDLESEX, NJ 08846

36. Transporter 1 Phone: 732 485-5185

37. Transporter 1 Address: MIDDLESEX, NJ 08846

38. Transporter 1 Phone: 732 485-5185

39. Transporter 1 Address: MIDDLESEX, NJ 08846

40. Transporter 1 Phone: 732 485-5185

41. Transporter 1 Address: MIDDLESEX, NJ 08846

42. Transporter 1 Phone: 732 485-5185

43. Transporter 1 Address: MIDDLESEX, NJ 08846

44. Transporter 1 Phone: 732 485-5185

45. Transporter 1 Address: MIDDLESEX, NJ 08846

46. Transporter 1 Phone: 732 485-5185

47. Transporter 1 Address: MIDDLESEX, NJ 08846

48. Transporter 1 Phone: 732 485-5185

49. Transporter 1 Address: MIDDLESEX, NJ 08846

50. Transporter 1 Phone: 732 485-5185

51. Transporter 1 Address: MIDDLESEX, NJ 08846

52. Transporter 1 Phone: 732 485-5185

53. Transporter 1 Address: MIDDLESEX, NJ 08846

54. Transporter 1 Phone: 732 485-5185

55. Transporter 1 Address: MIDDLESEX, NJ 08846

56. Transporter 1 Phone: 732 485-5185

57. Transporter 1 Address: MIDDLESEX, NJ 08846

58. Transporter 1 Phone: 732 485-5185

59. Transporter 1 Address: MIDDLESEX, NJ 08846

60. Transporter 1 Phone: 732 485-5185

61. Transporter 1 Address: MIDDLESEX, NJ 08846

62. Transporter 1 Phone: 732 485-5185

63. Transporter 1 Address: MIDDLESEX, NJ 08846

64. Transporter 1 Phone: 732 485-5185

65. Transporter 1 Address: MIDDLESEX, NJ 08846

66. Transporter 1 Phone: 732 485-5185

67. Transporter 1 Address: MIDDLESEX, NJ 08846

68. Transporter 1 Phone: 732 485-5185

69. Transporter 1 Address: MIDDLESEX, NJ 08846

70. Transporter 1 Phone: 732 485-5185

71. Transporter 1 Address: MIDDLESEX, NJ 08846

72. Transporter 1 Phone: 732 485-5185

73. Transporter 1 Address: MIDDLESEX, NJ 08846

74. Transporter 1 Phone: 732 485-5185

75. Transporter 1 Address: MIDDLESEX, NJ 08846

76. Transporter 1 Phone: 732 485-5185

77. Transporter 1 Address: MIDDLESEX, NJ 08846

78. Transporter 1 Phone: 732 485-5185

79. Transporter 1 Address: MIDDLESEX, NJ 08846

80. Transporter 1 Phone: 732 485-5185

81. Transporter 1 Address: MIDDLESEX, NJ 08846

82. Transporter 1 Phone: 732 485-5185

83. Transporter 1 Address: MIDDLESEX, NJ 08846

84. Transporter 1 Phone: 732 485-5185

85. Transporter 1 Address: MIDDLESEX, NJ 08846

86. Transporter 1 Phone: 732 485-5185

87. Transporter 1 Address: MIDDLESEX, NJ 08846

88. Transporter 1 Phone: 732 485-5185

89. Transporter 1 Address: MIDDLESEX, NJ 08846

90. Transporter 1 Phone: 732 485-5185

91. Transporter 1 Address: MIDDLESEX, NJ 08846

92. Transporter 1 Phone: 732 485-5185

93. Transporter 1 Address: MIDDLESEX, NJ 08846

94. Transporter 1 Phone: 732 485-5185

95. Transporter 1 Address: MIDDLESEX, NJ 08846

96. Transporter 1 Phone: 732 485-5185

97. Transporter 1 Address: MIDDLESEX, NJ 08846

98. Transporter 1 Phone: 732 485-5185

99. Transporter 1 Address: MIDDLESEX, NJ 08846

100. Transporter 1 Phone: 732 485-5185

e-Manifest **Rulemaking Activity**

- May 2001 – EPA proposed manifest revisions envision an e-Manifest system
- October 2012 – Hazardous Waste Electronic Manifest Establishment Act enacted
- February 2014 – Final e-Manifest Rule issued (aka “One Year Rule”)
- January 2018 – Final User Fee Rule Published

January e-Manifest Rule (01/03/2018)

- Announced effective date of e-Manifest as June 30, 2018
- Clarifies scope of e-Manifest - which shipments are included.
- Establishes EPA fees and payments for e-manifest transactions.
- Creates a new paper manifest form.

Scope of e-Manifest

- e-Manifest affects any regulated waste required to be shipped on a manifest, including:
 1. RCRA federal hazardous waste
 2. Regulated PCB waste shipped on a manifest
 3. State-regulated wastes (if manifest is required by origination or destination state)
 4. Very Small Quantity Generator waste only if a manifest is required by state
 5. Imported hazardous waste
- All manifest data from covered shipments must be sent to EPA's central manifest database by the receiving facility.

4 Manifest **Submission Types**

1. Full Electronic System (including Hybrid Method)
 - Manifest created as electronic in EPA's system and fully tracked to receiving facility as electronic.
 - Hybrid option allows for broker or transporter to sign for generator.
2. Paper Manifest with Electronic Data File Upload
 - Paper manifest used - Receiving facility electronically sends manifest data to EPA along with an image file upload.
3. Paper Manifest with Image File Upload
 - Paper manifest used - Receiving facility uploads manifest image only.
4. Paper Manifest Mailed to EPA for Upload (Expires 6/30/21)

Changes to the **Paper Manifest Form**

- Existing 6-part manifest (and continuation sheet) replaced with a new 5-part form.
- Eliminates the “Designated facility to consignment state” and “Designated facility to generator state” and replaces them with one copy that will be submitted to EPA’s e-Manifest system.
- Modifies copy distribution instructions on the form footer and the manifest instructions on the back of the form. Otherwise general format /layout of manifest is unchanged.
- Existing 6-part forms may continue to be used for a few months until new forms fully available.

Fee Rule - Policy Issues

- Addresses Homeland Security concerns with public accessibility of manifest data - redacts some acute HW
- Clarifies the responsibility for e-Manifest data corrections
- Transporter(s) listed on manifest may be modified enroute to TSDF provided:
 - ❖ *Consent from generator obtained through a contractual provision*
 - ❖ *New consent statement will be added in section 14...*
“Contract retained by generator confers agency authority on initial transporter to add or substitute additional transporters on generator’s behalf.”

Final e-Manifest Fees

- Per manifest fees vary by type of manifest submitted to EPA:
 - Electronic manifest: \$5.00*
 - Paper manifest data file upload: \$6.50*
 - Paper manifest image upload: \$10.00*
 - Paper manifest mailed: \$15.00*
- Final fee schedule was published June 28, was to have been 90 days before launch. Fee schedule to be revised on 2-year intervals.
- Receiving facilities billed for manifest transactions and pay invoices within 30 days at [pay.gov](https://www.pay.gov).

Veolia Fees and Upgrades

- Veolia will assess customers a fee of \$20 per manifest which includes the EPA fee to the respective TSDF and Veolia's fee associated with managing manifests into the EPA system
- We have invested in system development and upgrades to interface with the EPA for flat file and image uploading
- We will invest in electronic signing devices
- Transshipping costs to manage treatment residuals
- We will continue to improve the manifest information management process

Recent Developments of e-Manifest

- Released Version 1.0 – June 2017
- Released Version 2.0 – February 2018
- Beta testing started May 2018
- Those signing electronically need to go through identity proofing plus sign using a CROMERR compliant electronic signature (e.g., password plus personal challenge question).
- Industry concerns with inadequate time for user testing and adaptation of business systems. Also some significant policy issues and functionality remain to be addressed.

Veolia's **Implementation Plan**

- Completing programming revisions to existing Veolia manifest creation and tracking systems. Phased approach for e-Manifest implementation underway.
- Veolia has identified key personnel at each TSDF, they are registered and trained in the use of the EPA system.
- System testing for manifest data submission continues.
- On-going customer communications and coordination.

User Registration

- e-Manifest registration - www.epa.gov/e-Manifest
- Generators need to register with e-Manifest in order to view, create, and/or sign manifests electronically.
- Each user must register separately.
- Users can register for different permissions.
- Two “Site Managers” per EPA ID is recommended.

RCRAInfo Registration – **Permission Levels**

Level of Permission	Definition
None	The user has no permissions for these sites within the module specified.
Viewer	The user can view the data for these sites within the module specified but cannot change the information in any manner.
Preparer	The user can enter data for these sites within the module specified but cannot sign and submit the information to the regulatory authority.
Certifier	The user can sign and submit the information for these sites to the regulatory authority. This user is required to obtain an Electronic Signature Agreement.
Site Manager	The user can approve other users at their facility and submit data for industry application module.

Steps to **Access e-Manifest Site**

- Create a CDX Account (<https://cdx.epa.gov/>)
 - *Select RCRAInfo: Resource Conservation and Recovery Act Information*
 - *Create Electronic Signature Agreement (Lexis Nexis Identity verification)*
- Request EPA ID #
 - *Login to CDX account and select RCRAInfo*
 - *Select “Request Site ID” tab*
 - *Complete 8700-12 form online*
- Access e-Manifest
 - *Login to CDX account*
 - *Select RCRAInfo: Resource Conservation and Recovery Act Information*
 - *Select site from the “My Sites” page*
 - *Select e-manifest tab*

The screenshot displays the 'My Sites / Site Details' page for a site named 'TEST TSDF OF VA' located at '123 MAIN ST - ARLINGTON' with ID 'VAD000532119'. The 'e-Manifest' tab is highlighted with a red circle. The 'General Overview' section shows the following details:

General Overview	
Federal Generator Status	State Generator Status
Large Quantity Generator	Large Quantity Generator
Is Site Active	Date Last Updated
Yes	05/08/2017

The 'Map' section shows a map of the area around Reston, VA, with labels for Sterling, Potomac, Bethesda, Tysons, and Washington.

What Generators **Need to Know**

- New manifest procedures begin for any manifest initiated by the generator starting June 30, 2018.
- Existing paper manifest form is being replaced with a new 5-copy form. The new form will be effective starting on June 30, 2018.
- Generators may continue to use paper manifests after June 30, 2018.
- Receiving facilities must submit paper manifest data to EPA within 30 days of shipment receipt.
- Generators should consult with their State agencies to determine if a manifest copy must be submitted as well.
- Generators who wish to use electronic manifests will need an EPA Identification Number.

What to Expect on **June 30 Launch**

- Generators should expect to continue to use paper manifests until EPA releases fully functioning e-Manifest and industry systems have time to integrate functionality.
- Generators need to coordinate with their waste services provider or the receiving facility to determine what manifest type will be used (paper or electronic).
- Generators with e-Manifest accounts will be able to view manifests and participate in the electronic data corrections process.
- A generator desiring to utilize the e-Manifest system to create a manifest must confirm that the transporter(s) and receiving facility are able to sign electronically and accept the electronic manifest.

Resources

- Fact Sheets:
 - [General Public](#)
 - [Generators](#)
 - [Receiving Facilities](#)
 - [Transporters](#)
 - [Licensed Hazardous Waste Treatment, Storage or Disposal Facility](#)
 - [Brokers](#)
- e-Manifest FAQ

[Frequently Asked Questions](#)

- Hazardous Waste e-Manifest System Walkthrough
<https://www.youtube.com/watch?v=0H5ctnJEcfg>
- RCRAInfo Login for e-Manifest
<https://rcrainfo.epa.gov/rcrainfoprod>



Questions?

From email box
From Q&A pod

Wrap Up

- Thanks to our speakers: Tom Baker and Tom Daly
- Webinar follow up: email with the recording and presentation (with appendix)
- Emanifestquestions@veolia.com live for one month
- Ask your Veolia sales person

Thank you

Appendix

RCRAInfo Registration

- e-Manifest is being built as a module of EPA's RCRAInfo system.
- RCRAInfo currently has two "industry applications" available for electronic submittal of two other RCRA forms. e-Manifest will be the third application added.

EPA Form	RCRAInform Industry App	Status
Site Identification Form (EPA Form 8700-12)	MyRCRAid	Available now in certain states
Biennial Report (EPA Form 8700-13)	Biennial Report	Available now in certain states
Hazardous Waste Manifest (EPA form 8700-22)	e-Manifest	Launching June 30, 2018, everywhere

Approving New User Requests

Permission Level	States Opted into myRCRAid or BR	States Not Opted into myRCRAid or BR (i.e., e-Manifest only)
Site Managers <i>(Any of the three industry applications)</i>	Another Site Manager/ States	Another Site Manager/ EPA HQ
Certifier <i>(e-Manifest application)</i>	Site Manager	Site Manager
Preparer <i>(e-Manifest application)</i>	Site Manager	Site Manager
Viewers <i>(e-Manifest application)</i>	Site Manager	Site Manager

RCRA Info: Instructional Videos

- Additional instructional videos
 - *Industry myRCRAid Module*
 - *Industry User REGistration.*
- Separate portal (website) and log-in required
- <https://rcrainfoindustry.learningzen.com/>

The screenshot shows a web browser displaying the RCRA Info website. The address bar shows the URL: <https://rcrainfo.epa.gov/rcrainfoprod/action/industry/secured/home>. The website header includes the RCRA Info logo and navigation links: Home, Documentation, and Feedback/Report an Issue. A user profile for 'Tom' is visible in the top right. Below the header, there are tabs for 'My Sites', 'Requested Site IDs', 'Help', and 'Learning Zen'. The 'Learning Zen' tab is circled in red. The main content area is titled 'My Sites' and includes a search bar and a table of site information.

My Sites

Show 20 entries

Search:

Site ID	Site Name	Address	City	State	County	Status
WID003967148	VEOLIA ES TECHNICAL SOLUTIONS LLC	W124 N9451 BOUNDARY RD	MENOMONEE FALLS	WI	WAUKESHA	Active

Showing 1 to 1 of 1 entries

Previous 1 Next

Add Existing Site Request Site ID

CDX Sign-up

CDX Edit Account Profile

 [Contact Us](#)
Logged in as ONYXTDALY ([Log out](#))

1. Program Service
2. Role Access
3. Organization Information

Begin typing a program service name or related keywords to filter the list of available services (e.g., air quality system, AQS, or Clean Air Act).

Active Program Services List

ACRES: Assessment Cleanup and Redevelopment Exchange System

ARCS: Aircraft Reporting and Compliance System

BaSR: Burial at Sea

CDRS: Consent Decree Reporting System

CDX Sign-up – Select “RCRAInfo:Resource...”

OTAQREG: Office of Transportation and Air Quality Fuels Registration

OTAQWaiverCredits: Cellulosic Biofuel Waiver Credits Pay.gov Application

PSP: Pesticide Submission Portal

R7Exchange: R7 File Exchange

R9Exchange: R9 File Exchange

RCRAInfo: Resource Conservation and Recovery Act Information

RMPESSUBMIT: Risk Management Plan

SDWIS: Safe Drinking Water Information System

SPeCS: State Planning electronic Collaboration System (1)

SSTS: Section Seven Tracking System

SWIPR: Subpart W Impoundment Photographic Reporting

Title V: Petition Submittal

CDX - Logged in – Select Industry Application

Services Manage		
Status	Program Service Name	Role
	RCRAInfo: Resource Conservation and Recovery Act Information	Industry Application
	TRIME: Toxic Release Inventory Made Easy	
	TRIMEweb: Toxic Release Inventory Made Easy Web	TRI-MEweb
	WIETS: Waste Import/Export Tracking System	Export Preparer

Alerts

TRIMEweb: TRI-MEweb may experience intermittent outages between 9:00 PM (ET) Friday 06/01/2018 and 6:00 AM (ET) Monday 06/04/2018 due to system maintenance.
May 14 2018

CDX Service Availability

[See the status for all program services](#)

News and Updates

No news/updates.

[Add Program Service](#) | [Manage Your Program Services](#)

