

# **E-Manifest 2018**

## **A TSDF Perspective**

People & Technology Creating a Safer, Cleaner Environment

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### **Hazardous Waste Advisory Committee**

### **CT Dept of Energy and Environmental Protection**

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# Agenda

- e-Manifest Overview – Effective June 30
- What is an E-manifest?
- TSDF System Requirements
- Transporter System Requirements
- CHES New Tasks
- CHES Corporate responsibilities
- What We've Learned Since June 30
- Looking Forward
- Questions

# E-manifest History Overview



- The Hazardous Waste Electronic Manifest Establishment Act, signed into law on October 5, 2012, authorized EPA to implement a national electronic manifest system. (e-Manifest)
  - Purpose is to establish a national information technology (IT) system that transitions to a more streamlined, efficient, and automated system to track and manage hazardous waste shipments.
  - The EPA launched e-Manifest on June 30, 2018.
- The e-Manifest System is not fully developed – Parts will not be programmed until Fall 2018 and beyond.

# Process in Place June 30th

- TSDFs responsible for uploading manifests or otherwise providing information to EPA. As of today CHES has uploaded 149,266 manifests.
- Generators can still sign paper manifests
- DOT still requires a paper shipping document in the cab of truck.
- Generators still have to provide states copies of paper manifests (AZ, CA, ME, ND, NH, NY) CT no longer requires generators to mail their manifest copies.
- Generators still need to comply with document retention for paper manifests until available in E-manifest system.

# What is an E-manifest?

- Must have ELC suffix (replaces all used today like FLE, SKS, JJK).
- Can only be obtained from EPA web site.
- Full electronic manifest – all signatures need to be electronic CROMERR approved.
- Hybrid manifest – generator can ink sign but all transporters and TSDF must sign electronically (CROMERR approved).
- CROMERR = Cross-Media Electronic Reporting Rule

# Clean Harbors Systems Requirements

- Data to be uploaded with image to EPA.
- TSDF must invoice their customer to collect fee. This also required mobile device programming
- TBD – e-mail generator manifest view link
- TBD – Automatic corrections upload logic. EPA just released late October.
- TBD – Outbound and Inter Company loads to get ELC#.
- TBD – Inbound customer loads to get ELC#.

# Transporter Systems Requirements

- All drivers must register with RCRAInfo and pass ESA (Electronic Signature Agreement) requirements.
- All drivers need mobile access to e-sign manifest.
- Printer needed in truck? How to print for DOT?
- TBD – shipment details to be sent to EPA.
- TBD – Grouping function to allow bulk signing.

# Clean Harbors New Tasks

- 131 locations to register.
- Each location needs to pay their own invoice.
- Each location needs to log on daily to e-sign uploaded manifests
- Corrections must be made to any manifest failing upload validation.
- We had 6 locations with invoices greater than \$25,000 (credit card limit set by US Treasury). Those locations required check requests for ACH payments.

# CHES Common Errors/Issues

- No valid phone# on file.
- Date errors.
- Missing management method codes
- Manifest number typos
- Sequential line item errors
- DOT and RCRA waste code comparison
- Missing border crossing
- Mexico imports

# CHES Corporate Responsibilities

- Working with EPA over 2 years on project.
- Continue to join EPA developers call every other week
- Training – registration, signing, payments, navigate site.
- Finance – pcards, check requests, internal bookkeeping.
- General oversight – sign on time, pay on time.
- Error notifications and corrections.
- Customer interaction

# What Have We Learned Since June 30<sup>th</sup>?

- **Electronic Accounts:**
  - Some generators have consultants signing manifests on their behalf; current access system not useful for these situations
  - Electronic accounts for agents signing manifests is coming
- **Mailing Hard Copies to Generators**
  - TSDFs required to send signed copy to generators who are not registered with EPA.
  - TSDF responsible for knowing if generator is registered.
  - TSDFs have continued to mail back manifest copies but want this to stop soon
  - CHES looking into automated email system that would include link to view and save signed manifest.

# What Have We Learned Since June 30<sup>th</sup> (cont.)?



- Fees

- Fees paid by TSDFs (and passed on to generator)
- First two invoice cycles totaled \$727,935.00
- RCRA, TSCA and state regulated waste codes on manifest force upload to EPA.
- **ALL** manifests uploaded will be charged.

- State Waste Codes

- Confusion about using e-Manifests and when fees apply
- Example – Texas
  - Class 1 waste destined for recycling – no manifest
  - Class 1 waste destined for disposal – manifest and fee

# What Have We Learned Since June 30<sup>th</sup> (cont.)?



- Department of Homeland Security Chemicals
  - Chemicals of Interest (COI) initially removed from e-Manifest use
  - Restored 6 weeks later
  - Slowed down EPA development of other tools needed by generators, transporters, TSDFs
- EPA ID Numbers Required to Use e-Manifest System
  - System doesn't currently allow for non-routine situations such as:
    - Spills for utilities at different locations
    - Accidents on road

# What Have We Learned Since June 30<sup>th</sup> (cont.)?



- States and Regions Monitoring System for Compliance
  - Notices of Violation could be issued for compliance with exception reporting, generator classification (SQG vs LQG), biennial reporting, non-hazardous waste identification
  - Exception reports are still required even though TSDFs have extra time to upload initial manifests

# What Have We Learned Since June 30<sup>th</sup> (cont.)?



- EPA Has Target to Reduce Paper Manifests by 75%
  - EPA estimates about 330,000 hazardous waste manifests generated per month
    - 466 electronic submittals/day in July
    - 2,371 electronic submittals/day in August
  - EPA to monitor reduction for couple of years and revise fees, if needed, as incentive to move to e-Manifest
  - Still need technology for brokers and transporters to create manifests in EPA's system (in process)

# What Have We Learned Since June 30<sup>th</sup> (cont.)?



- Department of Transportation Shipping Paper
  - DOT currently not allowing electronic format for shipping papers
  - Talking with EPA
  - Concern about first responders being able to access information during an incident
    - First responders don't currently have accounts to access manifests in transit
  - Considering printers in cabs to print e-Manifest

# Looking Forward

- Goal is to go all electronic (generators, transporters, brokers and TSDF's)
- System will change over next four years – be patient
- Remember that states and regions will be looking at your manifests and data online for compliance
- EPA Resources
  - For more information on EPA's e-Manifest Program:  
<https://www.epa.gov/e-manifest>
  - Questions can be submitted to EPA at:  
[eManifest@epa.gov](mailto:eManifest@epa.gov)

# Q & A Session

