

Association of State and Territorial
ASTSWMO
Solid Waste Management Officials

1101 17th Street NW, Suite 707
Washington, DC 20036
T: (202) 640-1060 F: (202) 640-3254
www.astswmo.org

February 6, 2014

Rebecca A. Higgins
RCRA OMB Examiner
The Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20503

Dear Ms. Higgins,

The Board of Directors of the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) recently adopted the enclosed position paper, "e-Manifest System Development Funding". We wanted to share this position paper with you so that you are aware of our views regarding funding for development of the e-Manifest system. ASTSWMO is an association representing the waste management and remediation programs of the 50 States, five Territories and the District of Columbia (States).

ASTSWMO strongly supports the development of the e-Manifest system that is currently underway. We have supported this system since 2004 because it has the potential to provide the States, the federal government, and regulated industry with significant savings of time and resources as well as better and more efficient delivery of information. However, we are very concerned because the funding currently allocated and requested to develop the program is functionally inadequate. The position paper expresses our view that the current funding authorization of \$6 million will not lead to a timely system development, and urges additional funding be allocated to develop the system. We were pleased to see the funding support provided in the President's FY 2014 budget request and in the Consolidated Appropriations Act, 2014 to begin building the e-Manifest system. We urge that this funding support be expanded in future budgets in order to achieve timely system development.

ASTSWMO, through its Hazardous Waste Subcommittee, stands ready to work on this important topic. The following individual is the principal point of contact for the Hazardous Waste Subcommittee on this issue:

Joe Schieffelin (Colorado Department of Public Health and the Environment)
Phone: 303-692-3356
joe.schieffelin@state.co.us

Please feel free to contact me at 501-682-0960 should you wish to discuss this issue further.

Sincerely,

J. Ryan Benefield/ver

J. Ryan Benefield, P.E. (AR), ASTSWMO President