e-Manifest: READY TO LAUNCH

ASTSWMO MEETING – APRIL 2018
WHAT WILL WE COVER TODAY?

1. Reinforcing the basics
2. Where are we now?
3. What EPA and states need to do before June 30th
4. Fact sheets
5. What if the launch doesn’t go as planned?
6. Answers to ASTSWMO questions
7. System demonstration
REINFORCING THE BASICS: BENEFITS

- Cost savings and paperwork burden reductions
- Accurate, more timely information on waste shipments
- Creation of a single hub for reporting of manifest data
- More effective compliance monitoring by regulators
- Potential to integrate with RCRA BR and state systems
- Enhanced “cradle-to-grave” tracking of HW
1. e-Manifest will launch nationwide on June 30, 2018.

2. e-Manifest has been and will be available for testing, prior to launch, through Spring 2018.

3. All receiving facilities that receive waste that must be manifested under federal law or receive state-only hazardous waste that must be manifested as required by either the state in which the waste was generated or received, must submit those manifests to EPA either in paper or electronically. EPA will charge facilities an associated fee for each manifest submission.

4. Handlers will be required to register for e-Manifest to submit electronically and to make corrections.

5. Once the system launches, e-Manifest data will generally be available to the public 90 days post-receipt of the manifests.
## REINFORCING THE BASICS: ESTIMATED FEES

<table>
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<tr>
<th>Paper Manifest Types</th>
<th>Manifest Submission Type</th>
<th>Year 1 Fee (Estimated)</th>
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<tr>
<td>Mailed Paper</td>
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<tr>
<td>Image Uploads</td>
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<td>Data File Uploads</td>
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<td>Electronic Manifests</td>
<td>Electronic</td>
<td>$4.00</td>
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<td>(includes hybrid)</td>
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WHERE ARE WE NOW?

• User Fee rule is final – rulemaking checklists, including abbreviated checklist, available
• Ongoing user testing of system, new components released every two weeks
• States opted into myRCRAid or BR are “pre-registering” Site Managers; about 1,200 Site Managers currently registered
• 80+ FAQs available (https://github.com/USEPA/e-manifest/)
• Several technical workshops held
• Tribal webinar held in March 2018
• Ongoing communication – monthly webinars, Regional Roadshows (ten of ten held or scheduled!), stakeholder meetings, Listserv messages
• Monthly implementation meetings between EPA Regions and EPA HQ
WHAT EPA NEEDS TO DO

- Announce user fees
- Obtain OMB approval for the new 5-copy manifest form and share with registered printers
- Post instructions for how to send paper manifests to EPA
- Obtain “Authority to Operate” for e-Manifest system -- needed to receive live data and register users for the e-Manifest application
- Complete information on user registration
- Continue to collect, respond, and distribute FAQs
- Complete and distribute Fact Sheets
- Assist states with implementation, including modifying state rules & ensuring access to e-Manifest data
- Communicate, communicate, communicate!
- Launch system on June 30, 2018!
States play a critical role in ensuring the success of e-Manifest

EPA sees states as a key partner in communicating and coordinating outreach to their regulated community to ensure a smooth transition to e-Manifest.

EPA places a high priority on tapping the states’ expertise, to ensure seamless data flows from e-Manifest to state databases and in developing reporting functions to maximize the benefits and use of this first ever national repository of manifest data.

EPA needs help from its regional and state partners to successfully implement e-Manifest.
WHAT STATES NEED TO DO

- For states that have opted in to either myRCRAid or Biennial Report, continue approving Site Managers
- Issue EPA IDs for receiving facilities that don’t yet have one
- Prioritize adoption of the e-Manifest rules, including 2017 user fee final rule, the 2014 One Year rule, and (in some cases) the 2005 Uniform Manifest Revisions rule
- Determine how state tracking systems will link with and receive data from e-Manifest
- Assist with communications to regulated community
  - Post links to EPA’s e-Manifest site on state websites
  - Share Fact Sheets, FAQs, etc., with regulated community as they come available
TIMING OF MAJOR WORK

April 2018
- OMB approves new manifest 5-copy form
- EPA continues hosting e-Manifest Roadshows for states; other stakeholder engagement
- States register Site Managers

May 2018
- EPA/states register Site Managers
- EPA announces user fees
- EPA makes additional FAQs available
- Fact Sheets available; states disseminate to industry
- State websites reference e-Manifest

June 2018
- Launch system!
- All Fact Sheets final
- Additional FAQs available
- Anticipate need to rapidly answer and disseminate questions from users and states.
EPA has developed a set of six stakeholder-specific fact sheets:

- **General Audience, Generators, Transporters, TSDFs, Receiving Facilities, Brokers**

These fact sheets will include specific information for each stakeholder group, including how they are impacted and what they need to do regarding e-Manifest.

EPA anticipates finalizing the Fact Sheets by May 4 and then will provide them to states.

- States complete state-specific information
- States distribute to their regulated community

EPA will post Fact Sheets on e-Manifest website.

EPA is also working on a second round of stakeholder-specific fact sheets including for states, tribes, and site managers, which we hope to complete by late May.
WHAT IF THE LAUNCH DOESN’T GO AS PLANNED?

- Paper manifesting is always a fallback option.
- Limited help desk between June-September 2018. Anticipate capacity to include resolving limited number of tickets and holding webinars.
- Rapid issue elevation process—communication is key
  1. States raise issues to your Regional POC
  2. EPA to triage issues and respond as quickly as possible
  3. EPA to use e-Manifest Listserv to quickly communicate issue resolutions, FAQs
- Everyone can leverage existing resources (e.g., e-Manifest website, FAQs, Fact Sheets) to communicate to stakeholders
QUESTIONS FROM ASTSWMO

• When will EPA release full functionality for Site Manager?
• Once a state is authorized, what does EPA see as the state’s responsibility?
• How can enforcement staff use e-Manifest?
• What should states do if they receive hard copies of manifests post-June 30th?
• What about manifest corrections/discrepancies?
• What about VSQGs with no EPA ID numbers?
• What about temporary/one-time EPA ID numbers?
• Are the requirements of 40 CFR 270.11 applicable to approving Site Managers?
• How can states access the data in e-Manifest, particularly for those that charge fees based on volume?
### Regional Programmatic and Technical Points of Contact (POCS) for E-Manifest Implementation

<table>
<thead>
<tr>
<th>Region</th>
<th>Programmatic Contact</th>
<th>Email Address</th>
<th>Phone</th>
<th>Technical Contact</th>
<th>Email Address</th>
<th>Phone</th>
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<tbody>
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<td>415-972-3306</td>
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STATES OPTED IN TO RCRAINFO INDUSTRY APP

STATES THAT HAVE OPTED IN MyRCRAID, BR, OR BOTH
Submit input/questions to eManifest@epa.gov
Participate in our monthly webinars
To subscribe to the general program Listserv. Send a blank message to: eManifest-subscribe@lists.epa.gov
To subscribe to the developers only Listserv send a blank message to: e-manifestdev-subscribe@lists.epa.gov
Visit the program web site: http://www.epa.gov/e-manifest
SYSTEM DEMO – INDUSTRY & STATE USER