e-*Manifest*: JUNE e-MANIFEST WEBINAR BLITZ
TOPIC: "WHAT RECEIVING FACILITIES NEED TO KNOW"

JUNE 19, 2018

1. e-Manifest Launch Essentials
2. e-Manifest Scope
3. Impacts on Receiving Facilities
4. What Receiving Facilities Need to Do
5. Questions and Answers

e-MANIFEST LAUNCH ESSENTIALS

- e-Manifest launches nationwide on June 30, 2018.

- Receiving facilities will have option to create and submit manifests electronically.

- Receiving facilities may continue to user paper manifests after 6/30/18.

- **Receiving facilities must submit all final manifests, paper or electronic, to EPA.**

- EPA will charge receiving facilities an associated fee for each manifest submission. Fees differ based on submission type (paper or electronic) and method (mail or digital upload).

- All receiving facilities **must** have EPA ID Number and must register for e-Manifest.

- Existing 6-copy manifest form is being replaced with a new 5-copy form, but it will not likely be available from printers until about 9/1/18.

  - EPA has clarified in FAQ that receivers can continue to use up stocks of existing forms after June 30, but they must be vigilant about sending top copy to EPA if manifest initiated after June 30th.

  - The major change in new form: Distribution requirement states top copy to go to EPA system.

SCOPE OF E-MANIFEST

- e-Manifest act and EPA's e-Manifest regulations state that e-Manifest applies to all waste shipments for which the RCRA manifest is required as a matter of federal or state law

- Wastes that are covered include:

  - RCRA federal hazardous waste,

  - Regulated PCB wastes (TSCA) shipped on a RCRA manifest,

  - State-only regulated wastes subject to RCRA manifest under law of either the generator or destination state,

  - VSQG or other hazardous wastes that may be exempt from manifest federally, but state law requires manifest,

  - Imported HW shipped to domestic consignee facilities

- Exports of wastes out of U.S. are not covered

- Milk-run or consolidated waste manifests are **not** covered.

IMPACTS ON RECEIVING FACILITIES

- e-Manifest requirements place the primary responsibility on receivers to submit their final manifests to system and to pay the e-Manifest user fees

  - Electronic manifests submitted immediately when electronically signed

  - Paper manifests must be submitted within 30 days of receipt

- There are several ways for receivers to submit their manifests to EPA:

  - Electronic – using the system's web services or an API

  - 3 Types of Paper submissions: U.S. mail; image file upload; data file (plus image) upload

- The use of electronic manifests is optional, but receivers must register with e-Manifest and use the system to submit either electronically or submit paper.

  - BUT – the option of mailing paper manifests to EPA system expires on June 30, 2021

- Benefits to registration for receivers:

  - Billing will be handled electronically and billed according to Site ID

  - Registration supports viewing manifests, signing manifests electronically, and submitting post-receipt data corrections to system

  - Manifest records (electronic or image files) can be stored on e-Manifest account

- Other impacts to plan for:

  - Long-Arm provision: Shipments from out-of-state that require manifest in foreign state are subject to e-Manifest requirements even if waste is <u>not</u> regulated in your state!

  - Voluntary manifests should not be submitted to system – will result in unnecessary fee!

FLEXIBILITY AT LAUNCH FOR RECEIVING FACILITIES

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- EPA is aware that some receiving facilities need more time to prepare their systems and software for integration with e-Manifest
  - With additional time, facilities could submit data files rather than mail the paper forms to EPA
  - Could incur higher fees and create more work for EPA than would otherwise be necessary!
- As a result, EPA is granting facilities extra time to submit paper manifests during initial months
- For manifests received **between 6/30/18 and 9/01/18**, their submission can be deferred until no later than **September 30, 2018.**
  - Provides the facilities submitting paper up to an additional 60 days to make first submissions
- Normal rules apply to manifests received after September 1, 2018

E-MANIFEST ESTIMATED FEES

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- Unfortunately, the final fee schedule is not yet available for publication
- The estimated fees published in the Fee Rule are still a guideline on fee impacts
- Final fee schedule will be published very soon to web site

Year 1 Marginal Cost Manifest Estimated Fees by Manifest Type (2017$)		
Manifest Submission Type		Year 1 Fee (Estimated)
Paper Manifest Types	Mailed Paper	$20.00
	Image Uploads	$13.00
	Data File Uploads	$7.00
Electronic Manifests (includes hybrid)	Electronic	$4.00

WHAT RECEIVING FACILITIES NEED TO DO

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- Work with customers to select most suitable manifest creation option
  - Full paper process; fully electronic process; or "hybrid" with generator keeping paper
- Select preferred and suitable manifest submission option – note fee consequences
- Obtain EPA ID Number if you don't have one already
  - Apply to Region or State with EPA Form 8700-12 (Site ID Form)
- Register with e-Manifest!
  - Designate a Site Manager to handle payments and to approve other users and their permissions
    - Permissions: **Site Manager**; **Certifier;** Preparer; Viewer
  - Registration info and instructions available at www.epa.gov/e-manifest
  - Register for RCRAInfo Version 6:
    - https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login

- Submit input/questions to eManifest@epa.gov

- 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

- View program info and FAQs at: http://www.epa.gov/e-manifest