

Electronic Manifesting (e-Manifest)

40 CFR 262.24

- Uniform Waste Manifest
 - Required by both DOT and EPA when shipping Hazardous Waste
 - Signed by each waste handling
 - Generator must receive the signed copy back from TSD within 45 days
 - Exception report with State regulators
- Non-haz Waste Manifest

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page # of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address				A. State Manifest Document Number	
4. Generator's Phone () ()				B. State Generator's ID	
5. Transporter 1 Company Name	6. US EPA ID Number			C. State Transporter's ID	
7. Transporter 2 Company Name	8. US EPA ID Number			D. Transporter's Phone	
9. Designated Facility Name and Site Address		10. US EPA ID Number			E. State Transporter's ID
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt./Vol.	15. Waste No.
a.					
b.					
c.					
d.					
16. Additional Descriptions for Materials Listed Above		17. Handling Codes for Wastes Listed Above			
18. Special Handling Instructions and Additional Information					
19. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to the extent it does not present a future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name		Signature		Month Day Year	
17. Transporter 1 Acknowledgment of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
18. Transporter 2 Acknowledgment of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18.					
Printed/Typed Name		Signature		Month Day Year	

- ◆ Waste shipped
- ◆ Containers
- ◆ Cont Type
- ◆ Quantity
- ◆ Waste Codes
- ◆ Waste Stream Number
- ◆ Transporter

- EPA form 870-22 tracks the waste from “Cradle to Grave”.
- Passed from one person to the next in the chain.
- The Manifest Identifies:
 - Type and quantity of waste.
 - The transporter.
 - TSD where waste is being shipped.

MANIFEST, continued

- Generator must sign the manifest, ensure packaging and labeling meet DOT requirements, obtain transporters signature and supply at least six (five) copies of the manifest.



Generator Must be Notified

- In 35 days or call to find if where the waste is.
- In 45 days or call the EPA.



- HW must be properly packaged to ensure there is no significant release to the environment. Meet DOT requirements.
- Containers must be properly labeled and placarded to identify what is being transported, where it came from and where it is going, and provide special handling instructions.

- Hazardous Materials (DOT) vs. Hazardous Waste (EPA)
- Non haz waste can be hazardous materials
 - Example: Used oil
- Hazard Communication

- Shipping Name
 - Hazardous Materials Table
 - 49 CFR 172.101
- Hazard Class
 - Division 1 through 9
- Identification Number
 - UN or NA #
- Label
 - On each container

10/5/12

- Hazardous Waste e-Manifest Establishment Act

2/7/14

- One Year Rule

10/5/15

- e-Manifest System Congressional Due Date

4/16/16

- EPA assembled Advisory Committee

1/3/18

- Fee Rule

6/27/18

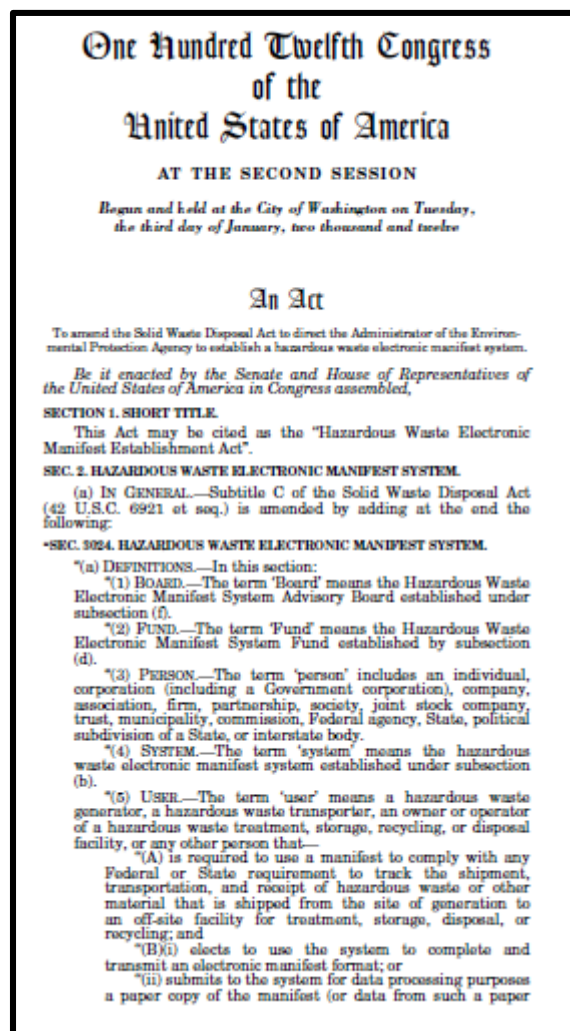
- EPA Releases Final Fee Structure

6/30/18

- Effective Date

7/17/18

- Mailing Address Released for Paper Manifests



- Required EPA to work with DOT
- Set regulatory deadlines
- Effective in all states simultaneously
- Set fee structure
- Established Board
- Allowed EPA to hire contractor



One Year Rule Highlights

79 FR 7917

- Informed the Fee Rule would be published later
- Identify scope of users
- No opt-out, either e-Manifest, or paper to electronic
- Data availability
- CROMERR signatures
 - Cross-Media Electronic Reporting Rule

Fee Rule Highlights

83 FR 420

- Methodology for fees
- Date EPA expects system to operational and available
- Allow changes to designated transporters
- Allow mixed, paper and electronic, manifests
- Gave suggested fees
- New 5-part paper form

Important Points

- No opt-out option
- All data stored in EPA's system
 - Regardless of submission type
- TSD is directly invoiced and pays all fees
- Everything that requires manifest is included
 - PCBs, state-only wastes
- e-Manifest does not replace/eliminate biennial reports
 - On EPA's to-do list for a future addition

Important Points

- Transporter to maintain a printed hazmat shipping paper
 - DOT requirement, not likely to change soon
- Data published 90 days from TSD receipt
- Certain CFATS related data will be “sanitized”
 - P and U listed only
 - Scrubbed of most shipment-specific details
- Brokers are acceptable
 - Addendum in new 8700-12
 - Functionality not yet active

What Does It Cost?

- EPA published final fees on 6/27/18
- Have chosen Option 3
- Heritage will assess a \$15/manifest fee
 - Federal hazardous waste
 - PCBs
 - State hazardous waste
 - Any waste that has to be on a hazardous waste manifest
 - Texas (Class 1 Industrial Waste)
 - Illinois (Special Waste)

User Fee Rule for e-Manifest

Type	Option	Details
Full Electronic	1	Electronic from start to finish All parties registered for e-signature
Hybrid Electronic	2	Generator uses paper, transporter digitizes Transporter and TSD register
Data plus Image	3	Paper until TSD, TSD uploads data and image Only TSD must register
Image Only	4	Image, but no data, uploaded, registration unknown
Mailed Paper	5	Mail to EPA, no registration

Transporters Not Selected by Generator

40 CFR 263

- In the case where Heritage uses transporter(s) not on manifest when you signed
 - Documented understanding between generators and Heritage
- Heritage will be sending an e-mail on this subject soon to allow you to authorize us to make these changes to a manifest
- Changing transporters does not increase your costs

System Features

40 CFR 262.24

- Web portal provided by EPA to use the system
 - Direct interfaces for third party software access
- System still under active development
 - Load test 6/28/18
- System integrates with
 - RCRAInfo for registration
 - CDX for signature management (think CROMERR)

User Roles/Permissions

40 CFR 262.24

- Site Manager: facility gatekeeper
 - Administers authorized users for a site
 - EPA recommends 2 per facility
 - Electronic signature (e-sign)
 - Administer user sub accounts
- Certifier: full authorization, plus e-sign
- Preparer: view, add and modify
- Viewer: only able to view information in system

Best Practices

- Encourage at least 2 people in compliance management register in the RCRA Info portal in the Site Manager role
 - Will be required to:
 - Administer sub-user accounts (not available)
 - E-sign and correct manifests
 - Assign broker privileges (not available)
 - See manifests as soon as they are posted (vs. waiting 90 days for public availability)

Example Registration Page – Can Register Today

- <https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>

RCRA Info

RCRAInfo (Pre-Production)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The system enables cradle-to-grave waste tracking of many types of information regarding the regulated universe of RCRA hazardous waste handlers. RCRAInfo characterizes facility status, regulated activities, and compliance histories in addition to capturing detailed data on the generation of hazardous waste from large quantity generators and on waste management practices from treatment, storage, and disposal facilities.

RCRAInfo Sign In

User Id

.....

Sign in

[Register](#) [Forgot password?](#)

[Warning Notice and Privacy Policy](#)

Example View Panel – Registered Sites

My Sites Requested Site IDs 0 Pending Requests 0

My Sites

Show 20 entries

Site ID	Site Name	Address	City
ARD981057870	RINECO CHEMICAL INDUSTRIES, LLC	1007 VULCAN ROAD	BENTON
AZD081705402	HERITAGE ENVIRONMENTAL SERVICES, LLC	284 E STOREY RD	COOLIDGE
LATEST000001	HERITAGE ENVIRONMENTAL SERVICES, LLC	0001 HEINZ RD	IOWA CITY



Site Information

My Sites / Site Details

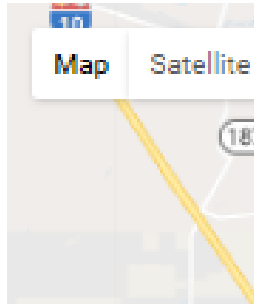
HERITAGE ENVIRONMENTAL SERVICES, LLC **284 E STOREY RD - COOLIDGE**

Site Details *myRCRAid* *Biennial Report* *e-Manifest*

General Overview

Federal Generator Status	State Generator Status
Large Quantity Generator	Large Quantity Generator
Is Site Active	Date Last Updated
Yes	10/30/2017

Map



E-Manifest Home Page

HERITAGE ENVIRONMENTAL SERVICES, LLC **284 E STOREY RD - COOLIDGE**

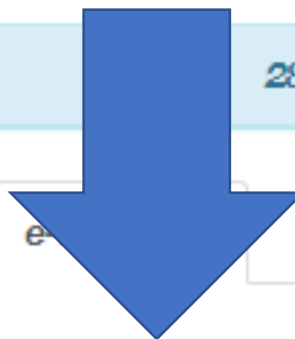
[Site Details](#) [myRCRAid](#) [Biennial Report](#) [e](#)

[Create New Manifest](#) [Upload Paper Manifest](#) [Sign Manifests](#)

In Progress

Show entries

Manifest ID#	Generator ID	Generator Name	
No manifests are currently in progress.			



Manifest View



Received

Show entries

Manifest ID#	Generator ID	Generator Name	Shipped Date	Received Date	Status	Actions
000770840WAS	OHD980613541	HERITAGE THERMAL SERVICES INC	01/16/2017	01/31/2017	Ready For Signature	
000770880WAS	OHD980613541	HERITAGE THERMAL SERVICES INC	01/24/2017	01/30/2017	Ready For Signature	
000770885WAS	OHD980613541	HERITAGE THERMAL SERVICES INC	01/24/2017	01/30/2017	Ready For Signature	
000770813WAS	OHD980613541	HERITAGE THERMAL SERVICES INC	01/11/2017	01/29/2017	Signed - Complete	
000770865WAS	OHD980613541	HERITAGE THERMAL SERVICES INC	01/22/2017	01/29/2017	Ready For Signature	

E-Signatures

40 CFR 262.24

- e-Signature must be CROMERR compliant
 - Cross Media Electronic Reporting Rule, 10/13/05 FR
 - Extra security requirements
 - Anyone who e-Signs must complete an ESA (Electronic Signature Agreement)
- Options:
 - EPA has approved tablet-based signatures (not currently developed for use)
 - Must use EPA's web portal to e-Sign

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Report: Management Alert – To Minimize Risk of Environmental Harm, the Security Categorization of Electronic Manifest System Data Needs to Be Re-Evaluated

Report #18-P-0217, June 21, 2018

What Was Found

A breach of hazardous material information within e-Manifest may facilitate terrorist or other criminal activities.

Report Materials

Podcast: Report Overview with Alonzo Munyeneh



[Download audio](#)

[Download transcript \(5.25 KB\)](#)

More Podcasts: Listen to our staff talk about their latest audit reports, investigative functions other initiatives.

<https://www.epa.gov/office-inspector-general/report-management-alert-minimize-risk-environmental-harm-security>

E-Manifest FAQs

- Question:

- What changes for generators sending waste to Heritage?

- Answer:

- Nothing.

- Question:

- Do I have to register to get a return copy of my manifest?

- Answer:

- Not at this time. We will post manifests on EIS and return manifests the way we always have.
- Good idea to get registered.

Any
Questions?