



e-Manifest

FLEXIBLE PACKAGING ASSOCIATION AND PLASTICS INDUSTRY ASSOCIATION – OCTOBER 2018



1. Reinforcing the basics
2. Key policies affecting generators
3. Timeline
4. Manifest activity since launch
5. System development
6. Communications
7. Contact information

1. e-Manifest launched nationwide on June 30, 2018.
2. e-Manifest has been and will always be available for user testing
3. All receiving facilities that receive waste that must be manifested under federal law or under state law must submit those manifests to EPA either in paper or electronically.
 - Applies when either generator state or destination state requires the RCRA manifest
 - EPA will charge facilities an associated fee for each manifest submission.
4. Handlers will be required to register for e-Manifest to submit electronically, to view their manifests, and to make corrections.
5. e-Manifest data will generally be available to the public 90 days post-receipt of the manifests.

REINFORCING BASICS: STATUTORY MANDATE

e-Manifest

- e-Manifest the result of mandate of the 2012 “e-Manifest Act.”
- Act required EPA to establish a national system for use and collection of electronic manifests and any paper manifests that continue in use.
 - By rule, EPA decided to collect only the final receiving facility copy of paper forms
 - States can still collect generator copy of paper manifests per state law
- Act requires EPA to fund all system related costs thru user fees
- Act requires consistent implementation of program in all the states
 - EPA will implement e-Manifest requirements until states are authorized
- EPA implemented the Act through two distinct rulemakings:
 - February 2014 “One Year Rule:” Legal and policy framework
 - January 2018 “User Fee Rule:” Methodology for determining and revising user fees

- 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

- User Fee Rule announced a differential fee methodology under which fees are based on the processing cost of each type of manifest and its method of submission.
- Using this methodology, EPA announced the initial fee schedule prior to June launch:
 - Electronic: \$5.00 per manifest,
 - Paper with data file and image upload: \$6.50
 - Paper with image file upload only \$10.00
 - Paper mailed to EPA by snail mail \$15.00
- EPA bills receiving facilities for these fees, not generators
- Fees will be revised at two-year intervals (per formula) and published to program's web site

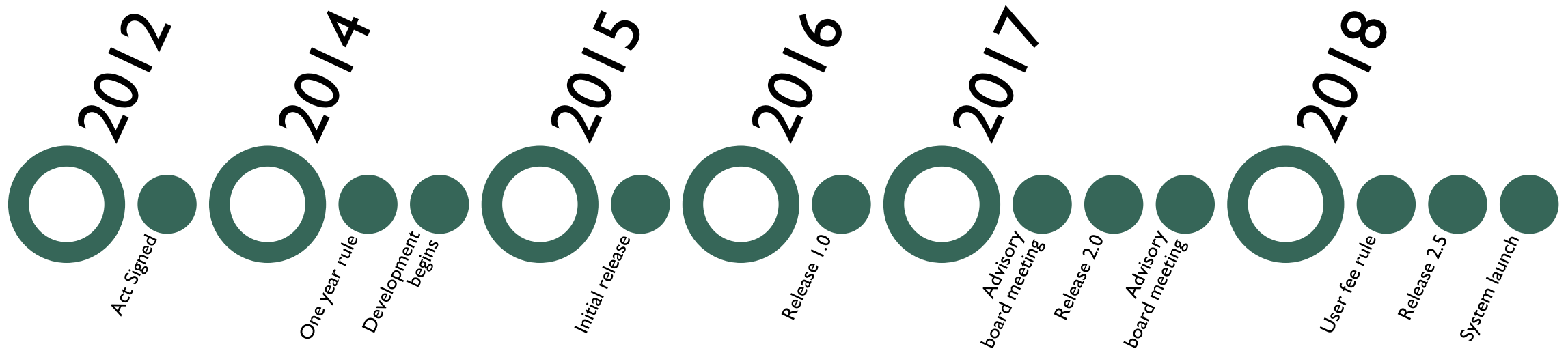
KEY POLICY AFFECTING GENERATORS

e-Manifest

- Scope limited to cases where RCRA manifest use required by federal or state law
 - Manifests that are voluntarily used to track shipments are not required to be submitted
 - Milk run or consolidated shipment manifests are not within scope
 - Export manifests are not currently in scope
- Generators can use electronic manifests only if their service companies use it
 - Electronic manifests include a “hybrid” option where generator can sign and keep a paper copy
- Several reasons for generators to register for e-Manifest:
 - If you desire to use electronic manifests,
 - If you want to participate in post-receipt data corrections,
 - If you use paper, but want to opt in to receiving TSDf copy electronically and not by mail.

E-MANIFEST TIMELINE

e-Manifest



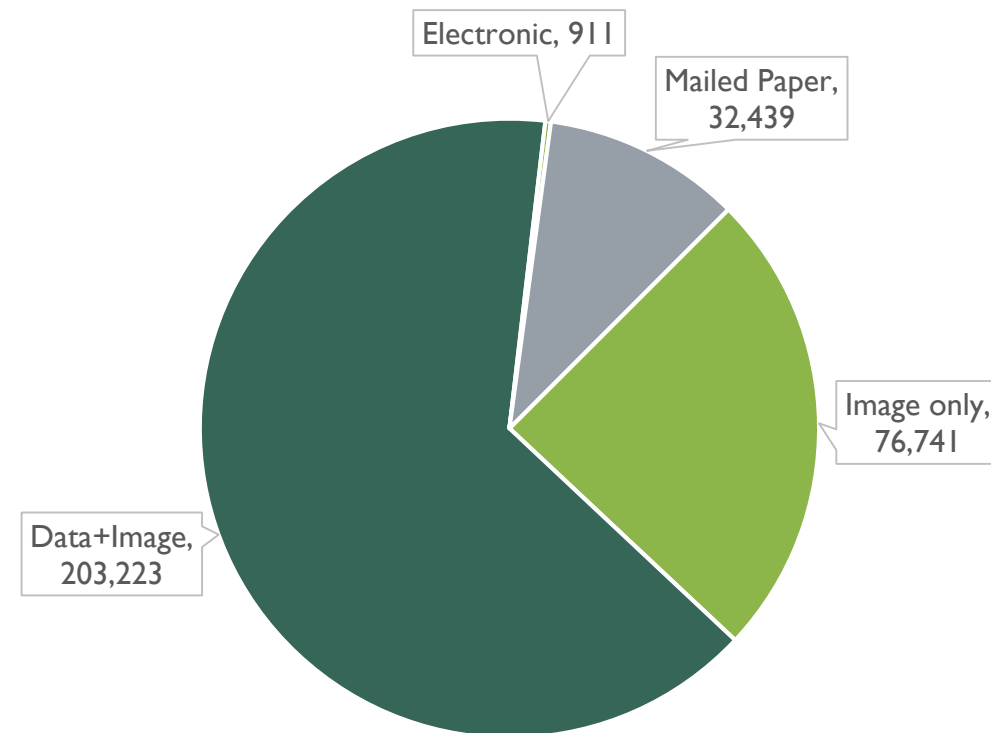
Continuous improvement based on user feedback



MANIFEST ACTIVITY SINCE LAUNCH

e-Manifest

- June 30th – September 30
 - Total billable manifests: **282,231**
 - Total manifests: **314,670**
- Daily Submission Averages
 - July: **466**
 - August: **2,483**
 - September: **10,139**



Manifests Submitted June 30 – Sept 30

- **Key functionality additions post system launch**
 - September – Corrections for all industry handlers – *User Interface Done*
 - Corrections via services delayed at industry request for additional testing
 - October/November – Data entry for Paper Processing Center
 - October/November – Copy manifest functionality
 - October/November – Enhanced broker and transporter functionality
 - November – Public reports
- **Ongoing efforts**
 - Work with states on enhancing services
 - Prioritize functionality with external stakeholders to plan next major release



COMMUNICATIONS UPDATE

e-Manifest

- Ongoing communication efforts:
 - Monthly public webinars, including demonstrations of new functionality.
 - Developer calls with receiving facilities.
 - FAQ development (~150 now available online)
 - Help desk/Listserv/e-Manifest inbox
- Developing new Fact Sheet for Emergency Response and Clean-up Personnel.
- In response to several requests by stakeholders, developing for the e-Manifest website a list of wastes that must be manifested per state or federal law.

- Visit the program web site: <http://www.epa.gov/e-manifest>
- Participate in our monthly webinars
- Help desk: (833) 501-6826
- 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