EPA's E-Manifest System: Connecticut-Specific Considerations

May 24, 2018 Kevin T. Sullivan, DEEP Manifest Program Hazardous Waste Advisory Committee Meeting





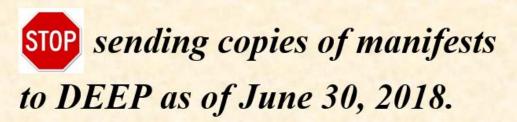
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www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

Dear Generators and Receiving Facilities,

Please:



Copies received will be recycled.

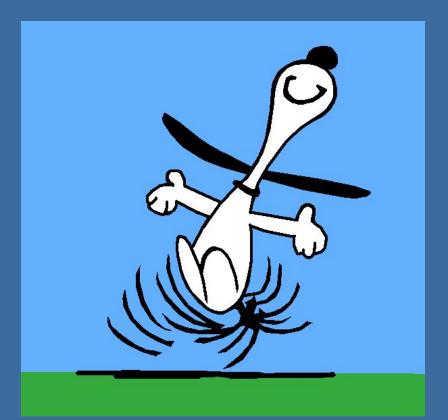
Thank you, DEEP





No More Copies =

Snoopy Dance!







NO MORE COPIES!



Details:

- Generators AND Receiving Facilities
- Do not send copies to DEEP
 - X No pages or copies from the manifest form
 - No photocopies of any part of the manifest
 - ➤ Not for RCRA hazardous waste
 - ➤ Not for PCBs (TSCA and CT-Regulated Waste (CR01)
 - Not CT-Regulated Waste ("CROX codes")
 - **×** Bills of Lading
 - Exception: unresolved discrepancy reports



Electronic Recordkeeping

No paper manifest records needed at your facility

- * If you can access E-Manifest system at your facility
- * for manifests dated 6-30-18 and thereafter

Details for e-recordkeeping:

- Your facility needs an EPA ID number
- ❖ Facility staff are:
 - o registered in RCRAInfo and
 - o have permissions approved for your facility
- Facility has computer / device(s) capable of accessing RCRAInfo



DEEP Recommends:

All Generators should consider registering

- Correct mistakes that can trigger other requirements
 - o (e.g. CT Property Transfer Program)
- View and track manifest real time, 24/7/365 from anywhere
- "myRCRAid": make changes to site info on line
- Not registered means:
 - o Can't make corrections or use myRCRAid
 - o Cannot see the manifest until it is published 90+ days later
 - Higher costs may be passed on to generator for using paper manifest

Register a "Site Manager" now

- E-Manifest will connect to Site Managers automatically 6-30-18
- Site Managers then approve others for your facility 24/7/365/anywhere:
 - o Facility staff, transporters, brokers, etc.



Next Steps:

- DEEP is developing policies to document these considerations prior to e-Manifest launch
 - No copies required to be submitted



- E-recordkeeping
- DEEP will later adopt E-Manifest rules and make associated changes in CT regulations



More Info and Contacts:

- EPA Fact Sheets and Webpage:
 - EPA E-Manifest Fact Sheets
 - o <u>EPA E-Manifest Webpage</u>
- DEEP Web links:
 - o DEEP Industry Apps Fact Sheet and DEEP Hazardous Waste Webpage
 - Note: HWAC listserv will be notified when this is updated for E-Manifest
- DEEP Contacts:
 - E-Manifest
 - Kevin T. Sullivan, 860-424-3275, kevin.t.sullivan@ct.gov
 - Mark Latham, 860-418-5930, mark.latham@ct.gov
 - o myRCRAid (site info changes, former EPA 8700-12 form)
 - Julie Dutton, 860-424-3279



Questions?



