EPA's E-Manifest System: Top Things You Need to Know

June 26, 2018 Kevin T. Sullivan, DEEP Manifest Program Solid Waste Advisory Committee Meeting



Top Things to Know

- 1) Starts June 30, 2018
- 2) Changes only affect manifesting
- 3) No manifest copies to CT DEEP
- 4) Registration is strongly recommended



1) Starts June 30th

"e-Manifest System":

- Federal law that starts June 30th in all 50 states
- Includes:
 - national on-line database called RCRAInfo;
 - central clearinghouse for EPA to collect manifests
 - EPA collects fees from waste receiving facilities for the cost of building and running the system



2) Changes Only Affect Manifesting

New Federal "e-Manifest Rules":

- Guiding principle:
 - Just rules to make manifesting electronic
- No new hazardous wastes listings
- No other new hazardous waste rules



3) No copies required for DEEP

Current CT law:

- Generators send a copy to DEEP
- TSDFs send up to 2 copies to DEEP

e-Manifest law:

- Pre-empts state laws regarding copies, so...

No Copies Required for DEEP



No copies notice sent to HWAC listserv



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Affirmative Action/Equal Opportunity Employer

Dear Generators and Receiving Facilities,

Please:

stop sending copies of manifests to DEEP as of June 30, 2018.

Copies received will be recycled.

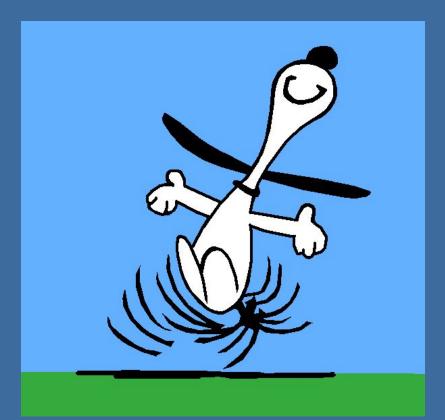
Thank you, DEEP





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



Kevin's Famous (Optional) Visual Demo





4) Generators Should Register

Benefits of Registration:

- Access to correct errors
- View / track manifests 24/7/365 on any device
- Electronic Recordkeeping through RCRAInfo



4) Generators Should Register

Not registered means:

- Can't make corrections
- X Cannot see the manifest until it is published 90+ days later
- X No electronic recordkeeping allowed
- Must make special arrangements to get paper copy back from receiving facility
- X Potential higher costs charged back to generator



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, <u>mark.latham@ct.gov</u>
 - myRCRAid (site info changes, former EPA 8700-12 form)
 - Julie Dutton, 860-424-3279



Questions?



