Quarterly Webinar Series January 31, 2024



# Agenda

- PCB rule manifest changes
- Requirement to Use Electronic Manifests for EPA-led Cleanups
- System updates
- New FAQ
- Reminder to use BR info with manifest

#### PCB rule manifest changes

## e-Manifest

Rule goes into effect February 26<sup>th</sup>, 2024 – Have you tested yet?

#### New Load Types

- 1. Article In Container Deactivated
- 2. Article Not In Container Deactivated
- 3. Bulk Waste No changes
- 4. Container No changes

#### 5. Transformer NEW

- JSON: Transformer
- 6. High or Low Voltage Capacitor NEW
  - JSON HighOrLowVoltageCapacitor
- 7. ArticleContainer NEW
  - JSON: ArticleContainer
- 8. Other NEW
  - JSON: OtherPcbOnly

### New Alternate Facility for Generators to add to their manifests in section 14 to clearly direct receiving facilities

# Requirement to Use Electronic Manifests for EPA-led Cleanups

- In November 2023 OLEM issued memorandum requiring electronic manifests at EPA-led cleanups as applicable, beginning FY 2025 unless there is a documented impediment to securing an e-Manifest compliant contractor.
- ORCR will coordinate with EPA regions, OSRTI, OEM, and other partner offices to determine the elements necessary to transition existing and future cleanups to using electronic manifests.

#### OFFICE OF LAND AND EMERGENCY MANAGEMENT WASHINGTON, D.C. 20460 November 14, 2023 MEMORANDUM Requirement to Use Electronic Manifest for EPA-led Cleanups SUBJECT: Digitally signed by BARRY BREEN Date: 2023.11.16 10:11:24-05:00 FROM Barry N. Breen BREEN Principal Deputy Assistant Administrator TO: Enforcement and Compliance Assurance Division Directors, Regions 1-10 Land, Chemicals, and Redevelopment Division Directors, Regions 1-10 Superfund and Emergency Management Division Directors, Regions 1-10 The purpose of this memorandum is to communicate OLEM's policy that EPA personnel and EPA contractors must use e-Manifest to meet hazardous waste manifesting requirements, as applicable, by the start of Fiscal Year 2025 unless there is a documented impediment to securing an e-Manifest compliant contractor. This new requirement applies to off-site shipments of hazardous waste and polychlorinated biphenyl (PCB) waste from EPA-led cleanups. EPA personnel and EPA contractors are encouraged to begin to use the system in advance of the mandatory deadline. For EPA-led Emergency Response (ERs) as well as Emergency Response and Removal (ER&R) actions, each ER&R regional program must develop a plan to increase the utilization of e-Manifest by the end of Fiscal Year 2025 Background on e-Manifest EPA established a national system for tracking hazardous waste shipments electronically. This system, known as e-Manifest, modernized the nation's cradle-to-grave hazardous waste tracking system while saving valuable time, resources, and dollars for industry and states. EPA launched e-Manifest on June 30, 2018. For more information on e-Manifest, see epa.gov/e-manifest. Benefits of Using Electronic Manifests There are several benefits to EPA from use of electronic manifests: Accurate and more timely information on waste shipments, including immediate visibility from the moment the manifest is prepared, through when the waste is shipped off-site and to the point the waste reaches its designated receiving facility.

e-Manifest

#### 4

## System updates



### PPC Correction Requests Part 1

- Ability for the Paper Processing Center to request changes from industry users on illegible and unclear manifests
- Correction Requests Enhancements
  - Industry Corrections Request filters and bulk corrections focus
  - Site Contacts added to Correction Requests (Reminder!)

## System updates



- System to System
  - Patch Services
    - Surgical update and correction services
  - EPA Waste Warning
    - Warning if folks send Federal Waste codes when EPA Waste is set to No
  - H135 Removed from New Manifests (and UI)

# System Updates (Upcoming)

- Billing Administration Correction Updates
  - Surgical Generator Information
  - Printed Signer Dates
- Paper Processing Corrections Requests Part 2
- Electronic Manifest Updates
  - Receiving Facility Opt in for Automatic Set to Scheduled
    - Generator Reminders for who sets to scheduled
  - Electronic Signature Dates
  - Adding Remote Signer to PDF in addition to Printed Signer
- Third Rule Design

# New FAQ

# 5. For paper manifests, is the data file or the scanned image the legal copy of record?

- The data file, scanned image, and any post-receipt corrections submitted through the e-Manifest corrections process all comprise the e-Manifest copy of record, and all components are relevant for state and federal enforcement purposes.
- This new FAQ clarifies the language in paragraph (3) in the definition of "user of the electronic manifest" at 40 CFR section 260.10.

# REMINDER: Use BR info with manifest

- New 2023 cycle BR validation
  - 10% weight difference between manifests and BR
  - Common causes:
    - Volumetric measures for manifests
    - Missing manifests (or manifests with incorrect generator ID)
- Consider submitting supplemental BR information with your manifests
  - Ask your TSDF to upload this data or utilize electronic manifests
  - Reminder if using electronic manifests:
    - You can enter in the BR information and/or Copy from a previous manifest

# Contact Info and Useful Links

- Help desk: (833) 501-6826
- GovDelivery e-Manifest ListServ
- e-Manifest Program website: <u>https://www.epa.gov/e-Manifest</u>
  - FAQs: <u>https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest</u>
  - Webinars: <u>https://www.epa.gov/e-manifest/monthly-webinars-about-hazardous-waste-electronic-manifest-e-manifest</u>

# Q & A

Please enter any questions into the chat.

