10 Things You Need to Know About e-Manifest

Clean Harbors and its Safety-Kleen subsidiary have been an integral part of e-Manifest design and planning from the earliest stages, offering feedback on proposed rules and active participation in all stakeholder meetings and decision making.

In an effort to reduce paper consumption, the EPA has spent the past eight years exploring the concept of a voluntary, nation-wide electronic manifest system for hazardous waste transportation and disposal. Following a multi-state pilot study conducted in 2009 and subsequent development, the e-Manifest System was signed into law in 2012; the EPA anticipates that it will be fully operational by June of 2018.

The ten questions below will provide essential information about the e-Manifest System and how it will impact your company’s hazardous waste management processes.

1. What is e-Manifest?
   e-Manifest is a United States government sanctioned electronic manifest process that will automate the current paper-based system through the use of computers and handheld devices, consolidating manifest data into a centralized national information bank and significantly reducing paper consumption and disposal. The system is designed to address the needs of all states, generators, transporters and TSDFs.

2. How does it work?
   e-Manifest electronically collects, tracks and stores manifest information for each shipment of waste—tracking the location of waste in real-time from the point of collection at the customer’s location to its ultimate disposal. The electronic format supports greater efficiency, flexibility and accuracy for all process stakeholders, as well as a reduction in task hours and associated costs.

3. How will my company benefit?
   The results of a 2009 EPA study indicate that annual savings for e-Manifest users will exceed $75 million, as well as reduce inputting and processing manifest data hours by 300,000-700,000. The system will also offer greater transparency and more rapid notification of potential shipment problems or discrepancies, improving tracking capabilities and on-time delivery ratios.
4. What other benefits does e-Manifest offer?
The use of e-Manifest will significantly reduce paper consumption and environmental impacts, and is designed to accommodate any future amendments to legislation, as well as ongoing technology advancements.

5. Is the e-Manifest System mandatory?
Yes. While use of the e-Manifest System is required, traditional paper manifests may also be submitted through the e-Manifest System for up to 3 years after implementation. Data from paper manifests will be keypunched or uploaded into the data system to create a single, unified data repository.

6. Will the e-Manifest System be linked to RCRAInfo?
Yes, e-Manifest will be linked to RCRAInfo, and can validate information entered on an electronic manifest against information in RCRAInfo. RCRAInfo is a separate EPA data system that collects information on hazardous waste sites, accessible by the public through RCRAInfo Web.

7. Are there additional costs associated with e-Manifest?
A fee—to be determined in the second quarter of 2018—will be assessed to process both electronic and paper-based manifest data in the e-Manifest System, supporting its use and development over the long term, including Phase II, which will offer users additional features such as biennial reporting and LDRs. Clean Harbors final implementation plan will reflect the final fee rule, the decision on e-signatures and other open issues.

8. Will existing EPA regulations change as a result of e-Manifest?
Yes. In order to sign a manifest electronically in the system, a user must be pre-registered and preauthorized by their employer. This will add additional administrative burdens to the user community.

9. Does e-Manifest require specialized technology or training?
No. The e-Manifest System is designed to work with any computer or handheld device and does not require specialized training on the part of end users with basic computer skills.

10. Are future enhancements planned for e-Manifest?
Yes. Within the next 12-18 months, e-Manifest users can expect Phase II features that include biennial reporting and LDRs.

Stay up to date with Clean Harbors.
For the latest news and developments about the e-Manifest System, including finalized fees, signature requirements and other important information, stay in touch with your account representative or visit www.cleanharbors.com.