



May 14, 2018

Re: Important Information Regarding the Environmental Protection Agency (EPA) Hazardous Waste Electronic Manifest (e-Manifest) System

Dear valued customer,

Let me take this opportunity to update you on the EPA's e-Manifest mandate and how it will affect hazardous waste shipping throughout the United States.

Background

The Hazardous Waste Electronic Manifest Establishment Act, signed into law on October 5, 2012, authorized the EPA to establish an automated national information technology system, e-Manifest. The system, which is planned to launch on June 30, 2018, will enable the Agency, the hazardous waste industry and the United States to utilize a more streamlined and efficient method to track and manage hazardous waste shipments.

Please know that as the market leader, we have participated on an e-Manifest task team with the EPA. Our goal has been to provide ongoing perspective and advocate on behalf of our customers and the industry as a whole.

The EPA will be imposing user fees to pay for the costs to operate, maintain and upgrade the system. The fees will be collected by TSDf owners and forwarded to the EPA. The user fees will include four levels based on the method used to collect the data that will be provided to the Agency:

- Paper manifest submitted to EPA
- PDF image of the manifest submitted electronically
- Data file and PDF image of the manifest submitted together
- Manifest created in e-Manifest system

Impact

As a transporter and processor of hazardous waste, Safety-Kleen will incur significant administrative and labor costs due to the new electronic system. Because the system does not validate manifest data (e.g., confirming profiles are approved at destination facilities, ensuring correct U.S. DOT shipping descriptions, proper RCRA and state waste codes, etc.), we must validate and approve all manifest information prior to uploading it to the e-Manifest Central Data Exchange (CDX) system. This step means that only correct manifest data is entered and ensures that all regulatory and safety factors are in place for the proper handling and management of the waste.



Initially, Safety-Kleen will support the paper manifest option. A new five-page manifest will replace the current six-page document. You will sign the manifest as you do now without any changes and still may have to provide states with copies of paper manifests, but not e-manifests. And, you will still need to comply with the three-year document retention period for paper manifests. Safety-Kleen will complete the remainder of the shipment tracking electronically in e-Manifest with electronic signatures and electronic transmissions to the CDX system. The cost for this will be \$10 per manifest.

We are also actively working on supporting the fully electronic and the “hybrid” or mixed paper/electronic manifest options. With the hybrid approach we will create the manifest in the e-Manifest system and print a paper copy of the manifest for you to sign and retain on-site as your initial manifest copy. We will complete the remainder of the shipment tracking electronically in e-Manifest with electronic signatures and electronic transmissions to the CDX system. Given the complexities of this approach, we may be forced to reassess the cost per manifest. Should that happen, we will advise you accordingly.

We are committed to delivering superior service and risk management. Should you have any questions or feedback, please contact your sales or customer service representative.

Your business is important to us and much appreciated. We will take all steps to ensure a smooth transition to the e-Manifest system. Please look for further updates from us as we near the rollout.

Yours truly,

David Vergo
President, Safety-Kleen