

Notes

NEWMOA Hazardous Waste Conference Call

May 28, 2019

Topic: e-Manifest Updates & State Experiences

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Participants: CT DEEP (4 people); ME DEP (1 person); Mass DEP (7 people); NH DES (11 people); NJ DEP (6 people); NYS DEC (14 people); EPA Region 1 (5 people); EPA Region 2 (2 people); NEWMOA (1 person)

Call Leader: None

Note-taker: NHDES

Notes prepared by Tyler Croteau, NH DES

State Comments or Questions on the e-Manifest System

Connecticut

- CT recommends making sure that the first person to register in e-Manifest for a facility is a site manager. This will allow other requests for that facility to be approved by the site manager and not the state.
- Question: What is EPA doing about inaccuracies when paper manifests are keyed into e-Manifest? Will the data in e-Manifest be accurate?

EPA Region 1 response: The processing facility has QA/QC procedures that being followed and under review at EPA.

- Question: What will e-Manifest have for reporting capabilities?

EPA Region 1 response: The Inspector Report is currently in draft form and has not been finalized. The report shows 30 days of information. The report does not include transporter or receiving facility information.

- Question: Connecticut uses temporary EPA ID numbers and generic CESQG ID number (CTCESQG99999) queries to target for inspections. Will Connecticut be able to continue to search/target this way using e-Manifest?

EPA Region 1 response: You can search for the generic CESQG ID numbers in e-Manifest but will need to look at each search result to determine the specific facility. EPA suggests using a site-specific EPA ID for all facilities manifesting waste to avoid this.

- Question: If a CESQG uses a manifest (that is not required), does the receiving facility need to submit to e-Manifest?

EPA Region 1 response: If hazardous waste was shipped then it does need to be submitted to e-Manifest. If the waste was not hazardous then it does not need to be submitted to e-Manifest.

- Question: If a CESQG voluntarily uses a manifest to ship hazardous waste and the information is submitted to e-Manifest, do the fees apply?

EPA Region 1 response: Yes.

Maine

- Maine has its own manifest database and is working with a developer to get data from e-Manifest into its own database. Not being able to get data from e-Manifest because of the backlog has been frustrating.
- Maine is concerned about errors being made when entering data in e-Manifest and that there is no way to flag errors when found.

EPA Region 1 comment: EPA will be reviewing processing facility QA/QC procedures and is not sure about the timeframe for error reporting. There need to be controls for changing errors and discrepancies that are found.

- States need to be able to see a facility's manifests beyond the 180-day period currently available. (See **“Further Discussion” below for follow-up on this issue**).

Massachusetts

- Quality control should be done up front and not have to be done by the states.

- Has concerns with states editing certified manifests from generators and TSDFs. In Massachusetts, certifying inaccurate information is a Class 1 violation that is subject to enforcement action.

New Hampshire

- NH still requires generators to submit manifest copies; if the generator does not send the copy and the manifest is not entered into e-Manifest because of the backlog, we don't know that waste was shipped.
- When a discrepancy between the paper copy and the data in e-Manifest is found, it is unclear which data should be used.
- Examples of issues NH has observed:
 - Scanned copy of manifest is not the correct manifest and belongs to a completely different generator in another state
 - Reverse side of manifest scanned
 - Email trails attached to scanned manifests

EPA Region 1 comment: Region 1 has worked with NH to resolve discrepancies. Handling discrepancies will be discussed on the next Regional Implementation Group call.

- The units for the e-Manifest reports are in tons; even small quantities of waste are reported in tons. There should be an option for different units in the report.

CT comment: Are current conversions to tons accurate? Are they based on density?

EPA Region 1 comment: This will be brought up to EPA Headquarters.

- EPA Region 1 comment: EPA needs to determine how to handle un-manifested hazardous waste or waste determined to be hazardous at the receiving facility.

New Jersey

- Experiencing issues related to the backlog. One TSDF is uploading data plus scanned image, and the other TSDF is uploading the scanned image only.
- The conversions used for converting from gallons to tons seem to be inaccurate; have seen a range from 1 lb./gallon to 68 lbs./gallon.

EPA Region 2 comment: Would it be better to use a specific gravity of 1 for all conversions?

- NJ is not clear who to contact when discrepancies in e-Manifest are discovered.

EPA Region 1 Comment: Contact your EPA Regional contact person. The regions gather information from the states and bring issues up to EPA headquarters.

- A search history function in e-Manifest would be useful.
- Question: Are wildcard characters allowed when searching in e-Manifest?

NY response: Wildcard characters are allowed. The RCRAInfo Help Menu has instructions.

- State waste codes are frequently not being keyed into e-Manifest. It seems that TSDFs are choosing to not key these codes.

NY comment: Contact the TSDF as they have the ability to make corrections.

CT Comment: CT has observed the same issue, with state waste codes appearing on paper manifests, but not being keyed into e-Manifest.

EPA Region 1: States are responsible for adding state waste codes to the pick-list.

New York

- NY has had problems with state waste codes not being entered into e-Manifest. Based on an audit, NY determined that:
 - 40% of PCB waste codes are not getting into e-Manifest
 - 90% of handling codes not in e-Manifest
- Receiving facilities have not been helpful in resolving issues with state waste codes. EPA should be taking enforcement action so that states can get accurate data.

EPA Region 1 comment: Region 1 has worked with TSDFs. NY should work with Region 2 on these issues.

- Not all necessary information from manifests is getting entered into e-Manifest

Further Discussion

During the call, there was discussion of e-Manifest’s limitations in producing manifest summary reports for specific generators. This issue was further discussed via an email exchange after the call.

The issue specifically raised during the call was that when a State searches for a specific generator and then runs the manifest summary report under the specific generator EPA ID, the date range is limited to 180 days, even when “Custom” is selected.

The other report discussed was the “Manifest Waste Shipment Report-Manifest Detail” report that is available in the “Reports” tab. This report does allow for a date range greater than 180 days, but it provides information for all generators in the state for that time period. This is potentially an unmanageable amount of data to sort through if a state is looking for generator specific information and/or preparing for an inspection.

This issue could be solved by either of the following options:

1. Increasing the allowed date range when running the manifest summary report under a specific generator EPA ID; or
2. Adding a field to the “Manifest Waste Shipment Report-Manifest Detail” report that allows you to query for a specific generator.

Lynn Hanifan of EPA Region 1 has spoken to EPA Headquarters about this issue since the call.

A possible workaround to view all manifests for a specific generator was discussed via email. Here are some suggested directions: on the RCRAInfo Home screen, under the e-Manifest tab, search using ONLY the Site Type and Handler ID. Do not select Date Range Type or enter anything into any of the Date Range fields. This query will show all manifests for a specific generator. It does not appear that this data can be exported from e-Manifest.