

# Transport, Manifesting & New e-Manifesting Regulations

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Michigan | Waste Webinar | May 2018





## Michigan's Transport Regulations & U.S. EPA's NEW e-Manifesting System

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### Today's Goals

- What businesses must know when shipping hazardous waste and liquid industrial by-products in Michigan
  - Michigan specific regulations requiring transporters to be permitted and registered by the DEQ
  - The hazardous waste manifest process, requirements, and common violations
  - The liquid industrial by-products shipping document process, requirements, and common violations
  - The NEW e-Manifest system being launched by U.S. EPA June 30, 2018.

### DEQ Transportation Regulations

- Act 451, Michigan Natural Resource and Environmental Protection Act
  - Part 111, Hazardous Waste
  - Part 121, Liquid Industrial By-Products
- Act 138, Hazardous Materials Transportation Act

### Federal Transportation Regulations "Hazardous Material"

- Covers U.S. DOT Hazardous Material which include:
  - Substances (products & wastes) listed in Hazardous Materials Table 49 CFR, 172.101
  - Materials exhibiting a hazard during transport
  - Hazardous waste is a U.S. DOT hazardous material BUT not all hazardous material is a hazardous waste!

### DEQ Transportation Regulation Act 138 "Hazardous Material"

- Includes only hazardous waste and liquid industrial by-products

### U.S. DOT Hazardous Materials Implementing Authority

- Michigan State Police (MSP), Commercial Vehicle Enforcement Division implements U.S. DOT regulations
- MSP Permits U.S. DOT hazardous material transporters

### DEQ Hazardous Materials Implementing Authority

- DEQ implements Act 138
- DEQ permits and registers Act 138 hazardous materials transporters

### DEQ Act 138 Hazardous Material Transport Contacts & Information

- Sandra Ray – 586-753-3850
- Jeanette Noechel – 586-494-5091
- [www.michigan.gov/deqwaste](http://www.michigan.gov/deqwaste), then select "Transporter" from the tabs on the left

### MSP US DOT Hazardous Material Contacts & Information

- Michigan State Police, Commercial Vehicle Enforcement Division –517-284-3250
- [www.phmsa.dot.gov/hazmat/regs](http://www.phmsa.dot.gov/hazmat/regs)
- [www.michigan.gov/ehsguide](http://www.michigan.gov/ehsguide), Chapter 4, Material Storage and Transportation

### Act 138 Transporter Requirements

- Permit (3 year) & Registration (1 year) required for:
  - Hazardous waste transport
  - Liquid industrial by-products transport
  - Hazardous and liquid industrial by-products transport

### Act 138 Transporter Requirements

- Fleet liability coverage must be maintained for accidental occurrences, no less than:
  - \$1,000,000 per occurrence for transport of hazardous waste



# Housekeeping



# Presenters



**Jeanette Noechel**  
Transporter Program  
Specialist  
Waste Management and  
Radiological Protection  
Division



**Rich Conforti**  
Management & Tracking Unit  
Supervisor  
Waste Management and  
Radiological Protection  
Division

# Questions & Answers



**Christine Grossman,  
DEQ Office of Public  
Affairs**



**Steve Donnelly  
U.S. EPA  
Headquarters**



**Fred Jenkins,  
U.S. EPA  
Headquarters**

# Transporter Regulations



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# DEQ Transportation Regulations

## Act 451, Michigan Natural Resource and Environmental Protection Act

- Part 111, Hazardous Waste
- Part 121, Liquid Industrial By-Products

## Act 138, Hazardous Materials Transportation Act



# DEQ Transportation Regulation

## U.S. DOT Hazardous Material

- Substances (products & wastes) listed in Hazardous Materials Table 49 CFR, 172.101
- Materials exhibiting a hazard during transport
- Hazardous waste is a U.S. DOT hazardous material BUT not all hazardous material is a hazardous waste!



DEQ  
Transportation  
Regulation

## Act 138 Hazardous Material

- Includes only hazardous waste and liquid industrial by-products





# Hazardous Materials Implementing Authority

Michigan State Police,  
Commercial Vehicle Enforcement  
Division implements U.S. DOT  
regulations, permitting U.S. DOT  
hazardous material transporters



# Hazardous Materials Implementing Authority

DEQ implements Act 138, permitting  
and registering Act 138 hazardous  
materials transporters



Act 138  
Transporter  
Information  
Act 138  
Contacts

## Act 138 Contacts

Sandra Ray– 586-753-3850

Jeanette Noechel – 586-494-5091

## Act 138 Web Information

Go to [www.michigan.gov/deqwaste](http://www.michigan.gov/deqwaste), then select “Transporter” from the tabs on the left



## US DOT Hazardous Material Information

### US DOT Contacts

Michigan State Police, Commercial  
Vehicle Enforcement Division –  
517-284-3250

### US DOT Web Information

[www.phmsa.dot.gov/hazmat/regs](http://www.phmsa.dot.gov/hazmat/regs)

[www.michigan.gov/ehsguide](http://www.michigan.gov/ehsguide)

Chapter 4, Material Storage and  
Transportation



# Act 138 Transporter Requirements

## Permit (3 year) & Registration (1 year) required for:

- Hazardous waste transport
- Liquid industrial by-products transport
- Hazardous and liquid industrial by-products transport



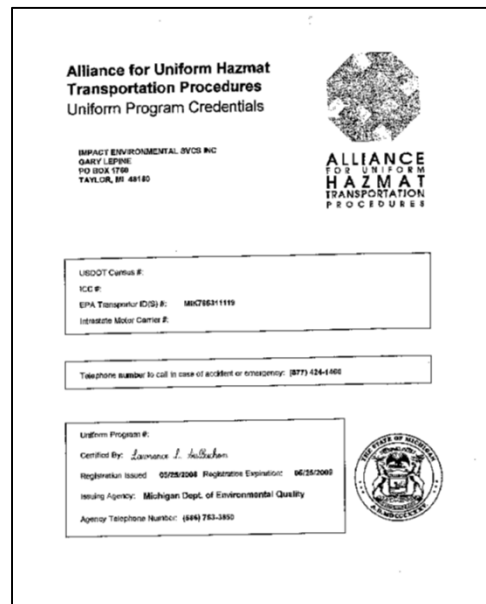
## Act 138 Transporter Requirements

### Fleet liability coverage must be maintained for accidental occurrences, no less than:

- \$1,000,000 per occurrence for transport of hazardous waste
- \$750,000 per occurrence for transport of liquid industrial by-products for fleets with  $\geq 10,000$  lbs. gross motor vehicle weight
- \$300,000 per occurrence for transport of liquid industrial by-products for fleets with  $< 10,000$  lbs. gross motor vehicle weight



# Act 138 Transporter Requirements



- Approval of Act 138 permit & registration result in issuance of “Credential” seen left
- Credential must be carried during transportation & presented upon inspection request (electronic or paper)
- Credential lists effective period

# Hazardous and Liquid Industrial Waste Transportation Requirements

Employ only Act 138 permitted & registered transporters to transport hazardous and/or liquid industrial waste by public roadway



Verify Act 138 transporter credential information by going to [www.Michigan.gov/deqwaste](http://www.Michigan.gov/deqwaste), selecting “Transporters” and following the instruction to find “Participating Transporters.”





# Shipping Documents



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## Shipping Documents

May be a log, invoice, bill of lading, or uniform hazardous waste manifest

Must be readable, readily accessible, and have required information

May be written or electronic

Must meet U.S. DOT requirements



# Shipping Documents

## Required information:

- Name and address of the generator
- Name of the transporter
- Type and volume of by-product shipped
- Date the by-product was shipped
- Name, address and Site ID number of the designated facility



## Individual Shipping Document Certification

Generator or generator representative signs/certifies shipping document stating:

- the shipping document fully and accurately describes the shipment
- the shipment is in proper condition for transport
- the shipping document information is factual



# Individual Shipping Document Certification

Transporter signs/certifies shipping document stating by-product listed on shipping document:

- was received
- will be delivered to the designated facility identified on the shipping document



## Individual Shipping Document Distribution

Generator retains copy of shipping documents with generator and transporter signature

Transporter obtains copy of shipping document with both signatures which accompanies the shipment during transport



# Individual Shipping Document Certification & Distribution

Designated facility – No certification or shipping document distribution is required

Designated facility must:

- provide confirmation of receipt to the generator or generator representative and
- only accept delivery where accompanied by shipping document listing the designated facility

Designated facility confirmation may be written or electronic (documented phone call, email, receipt, shipping document or manifest copy)





# Consolidated Shipping Document

For a CONSOLIDATED shipping document, transporter fulfills generator duties in completing the shipping document transporter AND provides receipt to generator with:

- Transporter name
- Driver's signature
- Date of pickup
- Type and quantity of by product accepted/shipped
- Consolidated shipping document number, and
- Designated facility



# Consolidated Shipping Document

Generator of brine may complete a  
single shipping document per  
transporter of brine per disposal  
well per month



# Manifests and Site ID

## Liquid Industrial By-products

All Uniform Hazardous Waste Manifests submitted to the U.S. EPA e-Manifest system require a Site ID

Generators using the e-manifest system as shipping document must obtain and use a Site ID



# Manifests and Site ID

## Liquid Industrial By-products

Generators using the Uniform Hazardous Waste Manifest as *PAPER* shipping document can enter the following for the Site ID field:

- MICESQG for CESQG waste only
- MILIB for liquid industrial by-product only
- MICESQGLIB for CESQG and liquid industrial by-product



## Shipping Documents Generators

Generators must provide a copy of the shipping document to transporters to accompany the by product to the designated facility

Generators must obtain confirmation of by-product receipt by the designated facility

If not received timely, generator must contact designated facility, and if receipt is not verified, report to the DEQ



# Individual Shipping Documents Transporters

Transporter must provide certification of acceptance of by product to generator, and deliver the by product only to the designated facility specified by the shipping document



## Consolidated Shipping Documents Transporters

Consolidated shipping documents are permitted for a single shipment of uniform types of liquid industrial by-product collected from multiple pickups for a single transport event

Transporter fulfills generator duties in completing the shipping document AND provides receipt to generator



## Consolidated Shipping Documents Transporters

Transporter receipt for generator must include:

- Transporter company name
- Driver's signature
- Date of pickup
- Type and quantity of by-product accepted
- The consolidated shipping document number
- The designated facility





# Liquid Industrial By-product Shipments Designated Facility

## Designated facilities:

- Can only accept delivery of by-product if the facility is the destination indicated on the shipping document
- Must provide the generator or authorized representative confirmation of receipt of by-product
- Must maintain records of characterization



# Manifests



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## Hazardous Waste Pre-Transport Requirements (Rule 305)

Package, label, & mark each hazardous waste package to meet U.S. DOT regulations

Mark each container of  $\leq 119$  gallons with:

- “HAZARDOUS WASTE – Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.”
- Generator name and address
- Generator Site Identification Number
- Manifest Tracking Number
- Hazardous waste codes for the waste



# Placards

SQG shipping > 1000 lbs. & LQG must have US DOT placards available for transporters

Call Michigan State Police, Commercial Vehicle Enforcement Division for more info about placards



# Manifests

Uniform Manifest must be used when hiring permitted and registered transporter to ship hazardous waste from a small quantity or large quantity generator

Shipping documents can be used for shipping liquid industrial by-product, including conditionally exempt small quantity generator hazardous waste



# Manifests

## Uniform Manifest exceptions:

- SQGs shipping hazardous waste off-site for reclamation and regenerated material is brought back to generator under a tolling agreement
- Bill of lading still required if U.S. DOT hazardous material



# Manifests

Generators must keep track of shipments and submittal of manifests

Manifest copies signed by the disposal facility should be sent back to the generator after date of shipment by:

**SQG** - 60 days: file exception report

**LQG** - 45 days: file exception report



# Manifests

Form Approved OMB No. 2000-0139  
EPA Form 8700-22 (Rev. 3-05) Hazardous Waste Manifest

1. Generator's Name and Mailing Address  
2. Generator's Site Address (if different than mailing address)  
3. Generator's Phone  
4. Generator's Facility Name  
5. Generator's U.S. EPA ID Number  
6. Generator's U.S. EPA ID Number  
7. Generator's U.S. EPA ID Number  
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98. Generator's U.S. EPA ID Number  
99. Generator's U.S. EPA ID Number  
100. Generator's U.S. EPA ID Number

Generators are responsible for all information on manifests

“Two signature” copy called “generator copy”

“Three signature” copy called “TSD copy” – Has 3 signatures verifying delivery to disposal facility





# Manifests Common Violations

The image shows a 'UNIFORM HAZARDOUS WASTE MANIFEST' form. Two red arrows highlight specific areas:

- One arrow points to the 'Site ID Number' field, which contains '000137379 GBF'.
- Another arrow points to the 'Waste Codes' table, which has columns for 'No.', 'Type', 'Quantity', 'U.S. EPA Code', and 'State Code'.

Using wrong Site ID number

Using wrong or incorrect waste codes

Failing to keep signed manifests for three years

Failing to have records of used oil shipped on consolidated manifest



# Current Manifest Procedure

Generator

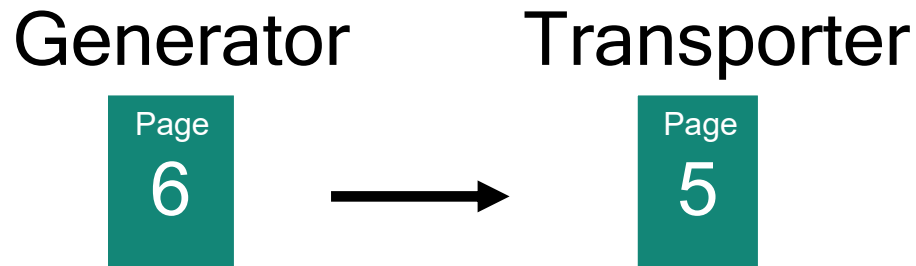
Page  
6

- Generator completes manifest
- Generator calls for pick-up



= page of manifest retained

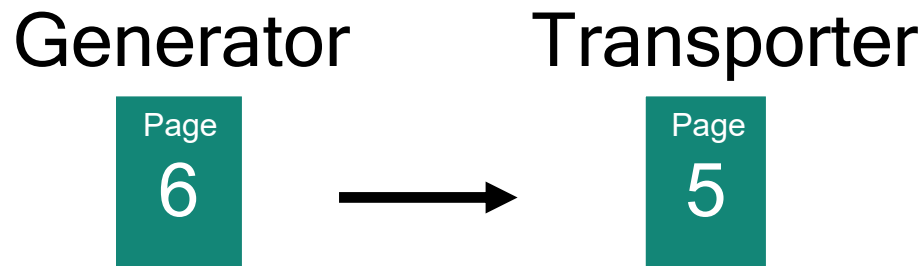
# Current Manifest Procedure



- Generator & transporter certify manifest information meets hazardous waste & U.S. DOT requirements
- Generator certifies to having pollution prevention plan/waste minimization plan

# = page of manifest retained

# Current Manifest Procedure



If transporter certifies for generator because they prepared shipment for transport, transporter must:

- Be familiar with generator's pollution prevention plan/waste minimization plan and
- Add the words "ON BEHALF OF" where they sign in Item 15

# = page of manifest retained

# Current Manifest Procedure

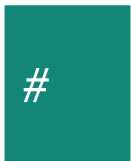
Transporter                      Designated Facility

Page  
5



Page  
4

Designated facility and transporter certify to manifest information accuracy and waste delivery via signature of manifest



= page of manifest retained

# Current Manifest Procedure

- Michigan TSDs electronically transmit hazardous waste manifests for shipments received to the DEQ each month
- Generators are responsible for submitting hazardous waste manifests signed by the receiving out-of-state hazardous waste TSDs to the DEQ

Page  
2

DEQ



Out of State  
Designated Facility

Page  
4

#

= page of manifest retained



# Current Manifest Procedure

TSD sends generator  
signed copy

Generator

Page  
6

Page  
3

Designated Facility

Page  
4



#

= page of manifest retained

# Current Manifest Procedure

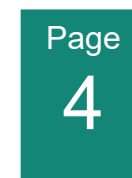
## Small Quantity Generator

If generator does not receive TSD signed copy within 60 days of shipment, generator must send a copy of the manifest with an explanation of the issue to the DEQ.

Generator



Designated Facility



= page of manifest retained



# Current Manifest Procedure

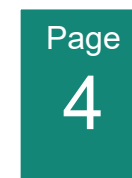
## Large Quantity Generator

If generator does not receive TSD signed copy within 35 days of shipment, generator must send a copy of the manifest with an explanation of the issue to the DEQ.

Generator



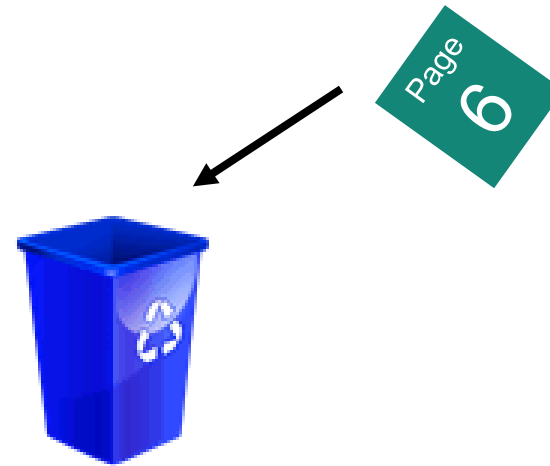
Designated Facility



= page of manifest retained

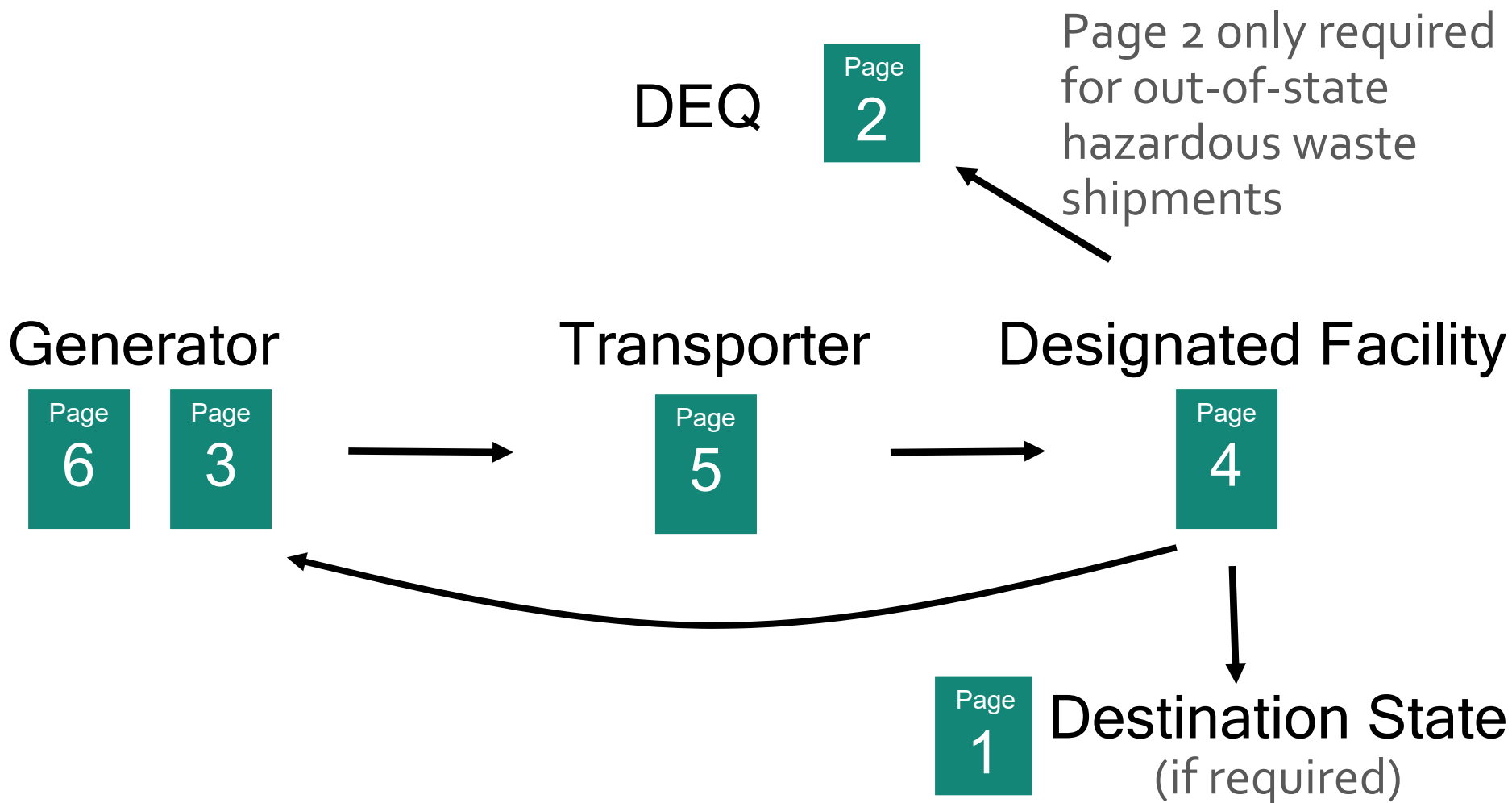
# Current Manifest Procedure

Generator keeps Page 3 for at least 3 years from date of off-site shipment



Following generator receipt of Page 3 of the manifest with the TSD signature, Generator can recycle Page 6 if desired

# Current Manifest Procedure



# Manifest Sections

Generator

International

Transporter

Destination Facility

Michi

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number <b>000061119 FLE</b>	
5. Generator's Name and Mailing Address			Generator's Site Address (if different than mailing address)			
Generator's Phone:						
6. Transporter 1 Company Name			U.S. EPA ID Number			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address			U.S. EPA ID Number			
Facility's Phone:						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity
				No.	Type	12. Unit Wt./Vol.
						13. Waste Codes
14. Special Handling Instructions and Additional Information						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offeror's Printed/Typed Name			Signature		Month Day Year	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name			Signature		Month Day Year	
Transporter 2 Printed/Typed Name			Signature		Month Day Year	
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____						
Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name			Signature		Month Day Year	

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

**DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)**



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number 000061119 FLE		
5. Generator's Name and Mailing Address		Gen Site ID		Gen Emergency Contact			
Generator's Phone:		Gen Name & Mailing Address					
6. Transporter 1 Company Name					U.S. EPA ID Number		
7. Transporter 2 Company Name		Trans Names			U.S. EPA ID Number		
8. Designated Facility Name and Site Address		Trans Site IDs			U.S. EPA ID Number		
Facility's Phone:							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
1.							
2.	Destination Facility Name						
3.							

# Generator Manifest Section



WASTE MANIFEST		000061119 FLE				
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)				
Generator's Phone:		<b>Container</b>		<b>Total Quantity</b>		
6. Transporter 1 Company Name		U.S. EPA ID Number		U.S. EPA ID Number		
7. Transporter 2 Company Name		U.S. EPA ID Number		U.S. EPA ID Number		
8. Designated Facility Name and Site Address		U.S. EPA ID Number		<b>Weight or Volume</b>		
Facility's Phone:		U.S. EPA ID Number		U.S. EPA ID Number		
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Container		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes
		No.	Type			
1.						
2.						
3.						
4.						
14. Special Handling Instructions and Additional Information						

GENERATOR

**Hazardous Material column**  
**Enter "X" if material in this row is a hazardous material**

**US DOT Description (inc, Proper Shipping Name, Hazard Class, ID Number and Packing Group)**

**Container Type**

**Container**

**Total Quantity**

**Weight or Volume**

**Waste Code**

## Generator Manifest Section



14. Special Handling Instructions and Additional Information			
<p><b>Special Handling (e.g. note if universal waste in Michigan)</b></p>			
<p>15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.</p>			
Generator's/Offeror's Printed/Typed Name		Signature	Month Day Year
TRANSPORTER INTL	16. International Shipments	<input type="checkbox"/> Import to U.S.	<input type="checkbox"/> Export from U.S.
	Transporter signature (for exports only):	Port of entry/exit:	Date leaving U.S.:
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials		
	Transporter 1 Printed/Typed Name	Signature	Month Day Year
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name	Signature	Month Day Year
	18. Discrepancy		
	18a. Discrepancy Indication Space	<input type="checkbox"/> Quantity	<input type="checkbox"/> Type
		<input type="checkbox"/> Residue	<input type="checkbox"/> Partial Rejection
		<input type="checkbox"/> Full Rejection	
	18b. Alternate Facility (or Generator):	Manifest Reference Number	U.S. EPA ID Number
	Facility's Phone:		
	18c. Signature of Alternate Facility (or Generator):		Month Day Year
	19. Hazardous Waste Report Management Method (including treatment, storage, and recycling systems)		
	1.	2.	3.
	4.		
	20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in item 19.		
	Printed/Typed Name	Signature	Month Day Year
<p>EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.</p> <p style="text-align: right;"><b>DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)</b></p>			



# Common Manifest Errors

Form Approved OMB No. 2050-0025  
UNIFORM HAZARDOUS WASTE MANIFEST  
000061119 FLE

1. Generator's Name and Mailing Address  
2. Generator's Site Address (if different from mailing address)  
3. Emergency Response Phone  
4. Manifest Number

5. Generator's U.S. EPA ID Number  
6. Transporter's U.S. EPA ID Number  
7. Designated Facility's Name and Site Address  
8. Designated Facility's U.S. EPA ID Number

9. Facility's Phone

No.	U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Weight	13. Waste Codes		
		No.	Type			1	2	3

14. Special Handling Instructions and Additional Information

15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this assignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, and are in full, except as provided for transport according to applicable international and national governmental regulations. I accept shipment and on the Primary Receipt, I certify that the waste management operations described in 40 CFR 261.202-204 are a large quantity generator or 30% of one a small quantity generator's flow.

16. International Shipments:  Import to U.S.  Export from U.S.  Part of shipment from foreign U.S.  Part of shipment to foreign U.S.

17. Transporter Acknowledgment of Receipt of Materials:  Signature  Date  Month  Day  Year

18. Discrepancy:  Quantity  Type  Partial Rejection  Full Rejection

19. Alternate Facility (if Generator):  Signature  Date  Month  Day  Year

20. Designated Facility (if Generator):  Signature  Date  Month  Day  Year

21. Designated Facility Owner or Operator:  Signature  Date  Month  Day  Year

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

#1 – Failure to keep reliable filing

Wrong waste codes

Wrong volumes

Failure to track manifest time limits







# Additional Resources

## Additional Resources for Manifests and Shipping Documents:

[www.michigan.gov/ehsguide](http://www.michigan.gov/ehsguide), Chapter 2

<http://www.deq.state.mi.us/pubcenter/>

- Liquid Industrial By-products FAQ
- Hazardous Waste, Liquid Industrial Waste, and PCB Manifest Requirements (aka Michigan Manifest Instructions)



# New e-Manifesting Regulations

*Rich Conforti  
Management and Tracking Unit Supervisor  
Hazardous Waste Section, Lansing  
Michigan Department of Environmental Quality*



# Electronic Manifests

(Rules 103, 304, 409, 608)

On April 5, 2017, Michigan rules adopting e-Manifests became effective providing for:

- **e-Manifests** initiated, completed, and transmitted in accordance with 40 CFR 262.20a(3), including those using secure e-signatures for generator, transporter and TSD to be the **legal equivalent of paper manifests** with handwritten signatures
- Requiring access to the e-Manifest system via desktop or portable electronic devices



# Electronic Manifests

(Rules 103, 304, 409, 608)

TSD receiving shipments required to be manifested must:

- If receiving a paper manifest, submit manifest electronically to EPA per 40 CFR 264.71(j)
- Pay a per-manifest fee to EPA for processing the e-manifest



## Electronic Manifests

(Rules 103, 304, 409, 608)

TSDs have four different e-manifest system submittal options:

- paper manifest (via mail) - \$20
- scanned, adobe (pdf) image of each paper manifest - \$13
- data file of all manifests - \$7
- e-manifest, originated in the e-manifest system, electronically signed by the generator, transporter and receiving TSD (paperless manifest) - \$4



# Electronic Manifests

(Rules 103, 304, 409, 608)

System launch is on June 30, 2018

First e-Manifests will be accepted by EPA on July 1, 2018

On and after July 1, 2018 all manifests must be submitted to EPA for processing

No more DEQ manifest handler fees for manifests initiated after July 1, 2018



# Electronic Manifests

(Rules 103, 304, 409, 608)

EPA is coordinating with DOT

E-manifest system will allow users to print a manifest that satisfies the U.S. DOT shipping paper requirements

U.S. DOT regulations still require hard copy **PAPER MANIFESTS** be in the power unit during transportation!

**Print all e-manifest for transport!!!**





# Electronic Manifests

(Rules 103, 304, 409, 608)

Manifest process (distribution) and instructions for completing a paper manifest are the same for the electronic manifest

Data elements will remain the same

Only differences involve completing an electronic form and signing the form electronically and only 5 pages for new paper manifest copies



# Electronic Manifests

(Rules 103, 304, 409, 608)

TSDs accepting waste from states other than Michigan originating on a manifest due to the out of state regulations must register and submit manifests to the e-manifest system

For example, if the material is hazardous in OH and non-hazardous in Michigan, the receiving facility must submit the e-manifest and pay the fee



# Electronic Manifests

(Rules 103, 304, 409, 608)

e-Manifest system will collect manifests for all wastes shipped on a manifest, including those regulated as hazardous waste by EPA and by states

e-Manifest system can be used for liquid industrial by-products documented on a uniform manifest

e-Manifests submitted to EPA will all be charged relevant fees



# Electronic Manifests

(Rules 103, 304, 409, 608)

Generators are encouraged to:

- review TSD literature on e-Manifest transition
- View EPA system walkthrough at <https://www.youtube.com/watch?v=0H5ctnJEcfg>
- See EPA web resources: [www.epa.gov/e-manifest](http://www.epa.gov/e-manifest)
- Register and test drive e-manifest system
- When shipping liquid industrial by-product using the e-Manifest system, use the Liquid Industrial By-product Waste Codes for completing the manifest



# Additional Resources

## Additional Resources for e-Manifests:

- See e-Manifest FAQs and Fact Sheets at [www.epa.gov/e-manifest](http://www.epa.gov/e-manifest)
- View Hazardous Waste Electronic Manifest (e-Manifest) System Walkthrough on YouTube
- Register at <https://rcrainfo.epa.gov/rcrainfoprod> to view your e-manifests
- Contact your receiving TSD



# Additional Resources

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# Questions?



Michigan | Waste Webinar | May 2018

