

Introduction



The New E-Manifest System for Shipping Hazardous Waste.

The who, what, when, where, and why of E-Manifests.

By Susan C. Kenney, CHMM

Why am I excited about it.....

- In hazardous waste business over 25 years.
- MD CHSAC 19 years.
- Member of AHMP for 14 years.

6 Cool Things I learned at AHMP National Conference



Types of Pharmaceutical Waste

Characteristic Hazardous
Lantus
Humalog
Humulin N&R
Novolog
Flovent
Taxol

P - Listed
Epinephrine
Nicotine Patches
Coumadin/Warfarin

U - Listed
Chemotherapy drugs
Cytosol
Mutamycin

* State Specific

Dual Waste - Hazardous
Regulated medical waste with RCRA (Resource Conservation and Recovery Act)
hazardous drug
Live vaccine

Non Compatible
Unused Silver Nitrate

In-Compatibles Identified by NDC's
Aerosols
Cysteine HCL
Glycopyrrolate
Sponox

#1. Approval of Pharm as universal next month. Oct 2018. Not exactly sure of final choices. (Paul Gallagher -McCoy)

#2. Aerosols as Universal is in the works – next year 2019.

#3. Cute saying – for Land Ban Forms – “No Significant D’s, No UHCs”... (Joel Gregier - Lion technology)

#4. Generator Rule – VSG can have one planned and one unplanned “larger “ disposal each year. Need 30 days notice for planned. Part of Gen. Improvement Rules. Check with State. (Steve Laughlin)

5. Someone is mad, pissed off, annoyed..., instead of saying “F off”, say... “I understand how you feel”.
(EHS Toolbox - Being an effective EHS professional need to be salesman... need to get buy in... by Tom Evans)



#6 How to label a cooler at a AHMP picnic

BAY ASSOCIATES
ENVIRONMENTAL, INC.
Chemical Disposal & Management Services



HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

ACCUMULATION START DATE 8-28-2018 EPA WASTE NUMBER 0001

DOT PROPER SHIPPING NAME UN3065: Waste alcoholic
AND beverages (beer, soda) 3, PGIII

DOT IDENTIFICATION NUMBER _____


GENERATOR'S NAME AND ADDRESS AHMP Conference
Grand Sierra Resort
Pono, NV

GENERATOR'S EPA IDENTIFICATION NUMBER _____

MANIFEST TRACKING NUMBER _____

HAZARDOUS WASTE – HANDLE WITH CARE

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11881  (11/13)

Outline of presentation



1. History and purpose

2. Different types of access and privileges for individuals in system

3. Different types of users.

4. How the e-manifest systems works - screen shots of the system.

5. Update on the status.

E-manifest has begun....WHAT????



Enacted law on October 5, 2012.

January 2018 – published final methodology for user fees. Based on cost of processing.

Official “Live” - June 30, 2018.

NOT NEW AT ALL



CONTROLLED HAZARDOUS SUBSTANCES ADVISORY COUNCIL MEETING

9:00 A.M. Thursday **June 10, 2004**, Meeting at MDE Potomac Conference Room,
(Montgomery Park) 1800 Washington Boulevard, Baltimore, Maryland

AGENDA

- I. Approval of last meeting's minutes.
- II. Update by Waste Management Administration.
- III. Old Business
 - Discussions on CHS Package
 - Updating the Council priority list
- IV. New Business:
 - Discussion on Council's Summer meeting
 - Council Field trip
- V. Legislative and Regulatory Update.
 - EPA Generator Initiative
 - Electronic manifest**
- VI. Any issues of concern to Members of the Council.

From the EPA - Benefits

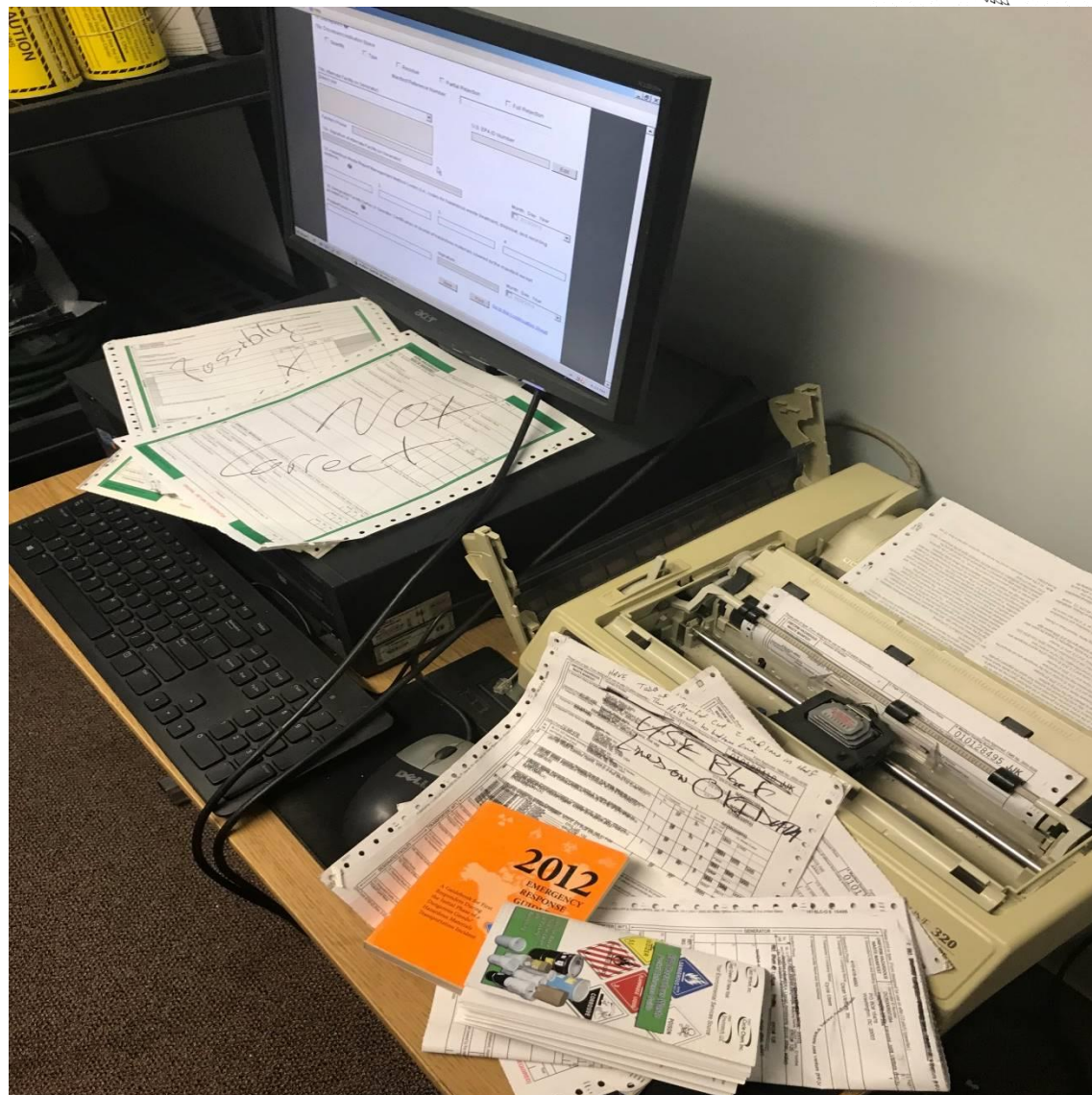


BENEFITS

e-Manifest

- Cost savings and paperwork burden reductions
- Accurate, more timely information on waste shipments
- Creation of a single hub for reporting of manifest data
- More effective compliance monitoring by regulators
- Potential to integrate with RCRA BR and state systems
- Enhanced "cradle-to-grave" tracking of HW

This is how
we do them
now





Like this - -NOT YET



BUT it will be like this....by using the EPA website.



4 Different level of users.

#1 Viewer



#2 Preparer



#3 Certifier



#4 Site Manager



Chart of privileges.



Functionality for e-Manifest	Viewer	Preparer	Certifier	Site Manager
View manifests	X	X	X	X
Create manifests or edit Draft manifests	N/A	X	X	X
Sign manifests or correct manifest data electronically, and submit manifests	N/A	N/A	X	X
Approve users and grant permissions (i.e. Viewer, Preparer, Certifier, and Site Manager) to other company contacts at a site. View billing invoices for a site as well as submit payments.	N/A	N/A	N/A	X

Activate Windows

5 User Types

TSDf



Transporters



Brokers



STATES



Maryland
Department of
the Environment



Generators.



Chart of Available features.

As of April 2018.... Maybe more updated, changes ongoing.



ELECTRONIC AND HYBRID MANIFEST

e-Manifest

Full electronic

	Create	View	Edit	Sign	Bulk sign	Normal workflow	Imports	Discrepancies	Residues	Rejections	CROMERR CoR**	Corrections
Generator	DONE	DONE	DONE	DONE	SUMMER	DONE	DONE	DONE	DONE	DONE	DONE	FALL
Transporter	DONE	DONE	DONE	DONE	SUMMER	DONE	DONE	DONE	DONE	DONE	DONE	FALL
Receiving facility	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE
Broker*	SUMMER	SUMMER	SUMMER	N/A	N/A	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	N/A	N/A
On behalf of	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	DONE	FALL

Hybrid

	Create	View	Edit	Sign	Bulk sign	Normal workflow	Imports	Discrepancies	Residues	Rejections	CROMERR CoR**	Corrections
Generator	N/A	DONE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	DONE	FALL
Transporter	DONE	DONE	DONE	DONE	SUMMER	DONE	DONE	DONE	DONE	DONE	DONE	FALL
Receiving facility	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE	DONE
Broker*	SUMMER	SUMMER	SUMMER	N/A	N/A	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	N/A	N/A
On behalf of	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	SUMMER	DONE	FALL

*if added to site by site manager, can perform broker functions prior to full functionality roll out

**users registered in system or with valid email address on manifest will receive notification that manifest has been signed by receiving facility



States opted into e-Manifest System



As of April 2018 –

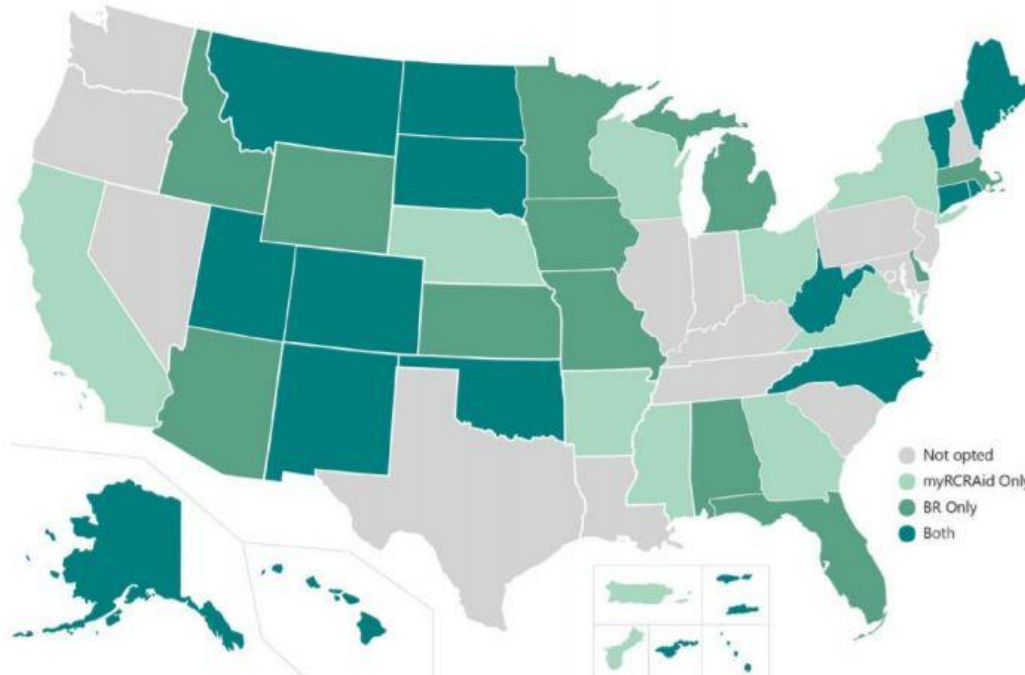
There are updates all the time. ...

E-Manifest system and BR= Biennial Reporting

STATES OPTED IN TO RCRAINFO INDUSTRY APP

e-Manifest

STATES THAT HAVE OPTED IN myRCRAid, BR, OR BOTH



How is it working right now.



Please print or type. 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
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. HMI	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type	11. Total Quantity
	1.				Unit WT/Vol.
	2.				13. Waste Codes
	3.				
	4.				
14. Special Handling Instructions and Additional Information					
15. GENERATOR/SIGNER'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, 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/Officer's Printed/Typed Name Signature Month Day Year					
TRANSPORTER	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				
DESIGNATED FACILITY	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 Manifest Reference Number: U.S. EPA ID Number				
	18b. Alternate Facility (or Generator) 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				

New 5 page manifest

Not many systems are fully electronic.

Only 600 manifests out of thousands have been submitted fully electronic.

API – interface between TSDF and EPA not fully functional.

\$\$\$ User FEES \$\$\$



EPA. There are three ways for receiving facilities to submit a paper manifest: (1) through the U.S. mail; (2) upload of a scanned image of the manifest; and (3) sending a data file plus a scanned image of the manifest. Once the paper manifest is received by EPA, EPA will charge a user fee for each manifest based on how the manifest was submitted and the corresponding costs to EPA to process the data. EPA charges the highest user fee for paper manifests mailed to the Agency, a lower fee for uploads of scanned images, and a lower fee still for manifests submitted as data files plus scanned images.

FINAL USER FEES

e-Manifest

Manifest Submission Type	Fee per Manifest
Mailed in Paper Manifest	\$15.00
Scanned Image Upload	\$10.00
Data + Image Upload	\$6.50
Electronic Manifest (Fully Electronic & Hybrid)	\$5.00

EFFECTIVE JUNE 30, 2018 – SEPTEMBER 30, 2019

Saving Money



on the user community. The EPA estimates e-Manifest will save state and industry users, on average, an annualized \$66 million per year over the first six years of system operation, and more than \$90 million once electronic manifests have been widely adopted. The system will establish a national reporting hub and

Step #1 sign in or get a an account

Google EPA e-manifest OR <https://www.epa.gov/e-manifest>



RCRAInfo (Production)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The system enables cradle-to-grave waste tracking of many types of information regarding the regulated universe of RCRA hazardous waste handlers. RCRAInfo characterizes facility status, regulated activities, and compliance histories in addition to capturing detailed data on the generation of hazardous waste from large quantity generators and on waste management practices from treatment, storage, and disposal facilities.

RCRAInfo Sign In

Sign in

[Register](#)

[Forgot password?](#)

Warning Notice and Privacy Policy

Warning Notice

In proceeding and accessing U.S. Government information and information systems, you acknowledge that you fully understand and consent to all of the following:

1. you are accessing U.S. Government information and information systems that are provided for official U.S. Government purposes only;
2. unauthorized access to or unauthorized use of U.S. Government information or information systems is subject to criminal, civil, administrative, or other lawful action;
3. the term U.S. Government information system includes systems operated on behalf of the U.S. Government;
4. you have no reasonable expectation of privacy regarding any communications or information used, transmitted, or stored on U.S.








Activate Windows
Go to Settings to activate Windows


[Home](#)
[Tools ▾](#)
[Documentation ▾](#)
[Feedback/Report an Issue](#)
[Stephen !\[\]\(a870788d6ed9b8fd294b7654a8c8526b_img.jpg\)](#)
[My Sites](#)
[Requested Site IDs 0](#)

My Sites

Show ▾ entries

Search:

Site ID 	Site Name 	Address 	City 	State 	County 	Status 
NJN986632149	VEOLIA ENVIRONMENTAL SERVICES	27-33 IOWA AVE	PATERSON	NJ	PASSAIC	ActivePendingChanges
VAR000523126	CVS PHARMACY #2491	2400 JEFFERSON DAVIS HWY	ARLINGTON	VA	ARLINGTON	ActivePendingChanges
VA988177803	HEATING AND OIL	144 FIRST STREET	FREDRICKSBURG	VA	FAIRFAX	Active
VATEST000001	TEST TRANSPORTER 1 OF VA	2777 SOUTH CRYSTAL DRIVE	ARLINGTON	VA	ARLINGTON	Active
VATEST000002	TEST TRANSPORTER 2 OF VA	2777 S CRYSTAL DRIVE	ARLINGTON	VA	ARLINGTON	Active
VAD000532119	TEST TSDF OF VA	123 MAIN ST	ARLINGTON	VA	ARLINGTON	Active
VATEST000003	TEST TSDF OF VA TWO	2777 S CRYSTAL DR	ARLINGTON	VA	ARLINGTON	Active

Showing 1 to 7 of 7 entries

[Previous](#) [1](#) [Next](#)
[Add Existing Site](#)
[Request Site ID](#)

[Home](#)[Tools ▾](#)[Documentation ▾](#)[Feedback/Report an Issue](#)Amanda [My Sites](#) / [Site Details](#)

TEST GENERATOR OF VA

2777 S CRYSTAL DRIVE - ARLINGTON

VATEST000004

[Site Details](#)[myRCRAid](#)[Biennial Report](#)[e-Manifest](#)

General Overview

Federal Generator Status

Large Quantity Generator

State Generator Status

Small Quantity Generator

Is Site Active

Yes

Date Last Updated

01/22/2018

Site Mailing Address

2777 S CRYSTAL DRIVE
ARLINGTON, VA 22202

Site Contact

SCOTT CHRISTIAN
2777 S CRYSTAL DRIVE
ARLINGTON, VA 22202[Back to My Sites](#)

Map



List of Manifest Status and Create Button



RCRA Info Home Tools Documentation Feedback/Report an Issue Stephen

My Sites / VA988177803 / e-Manifest Dashboard

HEATING AND OIL 144 FIRST STREET - FREDRICKSBURG VA988177803

Site Details myRCRAid Biennial Report **e-Manifest**

In Progress

Show 10 entries Search:

Manifest ID#	TSDf ID	TSDf Name	Last Updated Date	Status	Actions
100003487ELC	MAD053452637	CLEAN HARBORS OF BRAINTREE INC	03/26/2018 06:54 PM	Scheduled	Edit View Print
100003547ELC	ALD079474037	UNIVERSITY OF SOUTH ALABAMA	03/23/2018 09:58 AM	Pending	Edit View Print
100003382ELC	UTD981552177	CLEAN HARBORS ARAGONITE, LLC	03/21/2018 06:04 PM	Scheduled	Edit View Print
100003500ELC	LAD610395127	CLEAN HARBORS BATON ROUGE LLC	03/20/2018 09:04 AM	Pending	Edit View Print
100003495ELC	MAD053452637	CLEAN HARBORS OF BRAINTREE INC	03/20/2018 08:37 AM	Scheduled	Edit View Print
100003494ELC	MAD053452637	CLEAN HARBORS OF BRAINTREE INC	03/19/2018 07:19 PM	Scheduled	Edit View Print
100003492ELC	ARD069748192	CLEAN HARBORS EL DORADO, LLC	03/19/2018 03:22 PM	Scheduled	Edit View Print
100003491ELC	MAD053452637	CLEAN HARBORS OF BRAINTREE INC	03/19/2018 03:04 PM	Scheduled	Edit View Print
100003490ELC	MAD053452637	CLEAN HARBORS OF BRAINTREE INC	03/19/2018 02:39 PM	Scheduled	Edit View Print
100003488ELC	MAD053452637	CLEAN HARBORS OF BRAINTREE INC	03/19/2018 02:30 PM	Scheduled	Edit View Print

Showing 1 to 10 of 40 entries

Previous 1 2 3 4 Next

Create New Manifest

Received

Show 10 entries Search:

Manifest ID#	TSDf ID	TSDf Name	Shipped Date	Received Date	Status	Actions
100003620ELC	VAD000532119	TEST TSDf OF VA	03/28/2018	03/28/2018	Signed - Complete	View Print
234234234JJk	VAR000503920	MXI ENVIRONMENTAL SERVICES LLC	03/20/2018	03/22/2018	Signed - Complete	View Print
100003366ELC	VAD000532119	TEST TSDf OF VA	03/15/2018	03/15/2018	Signed - Complete	View Print
342343242JJk	VAD000532119	TEST TSDf OF VA	03/14/2018	03/15/2018	Ready For Signature	View Print
014070598JJk	VAD000532119	TEST TSDf OF VA	03/14/2018	03/15/2018	Signed - Complete	View Print
100003397ELC	VAD000532119	TEST TSDf OF VA	03/14/2018	03/14/2018	Signed - Complete	View Print
100003406ELC	VAD000532119	TEST TSDf OF VA	03/14/2018	03/14/2018	Ready For Signature	View Print
432342343JJk	VAR000503920	MXI ENVIRONMENTAL SERVICES LLC	03/12/2018	03/14/2018	Signed - Complete	View Print
324234234JJk	VAR000503920	MXI ENVIRONMENTAL SERVICES LLC	03/11/2018	03/13/2018	Signed - Complete	View Print

My Sites / VAR000503920 / e-Manifest Dashboard / e-Manifest

 DRAFT

 PENDING

 SCHEDULED

 IN TRANSIT

 RECEIVED

General Information



Manifest Tracking Number *

Manifest Type

Paper + Data

Select a status for this manifest *

- ☒ Ready For Signature - Received by Designated Facility and ready to be signed

1-5. Generator Information *

Select Search for Generator to find the generator for this manifest.

Search for Generator

6-7. Transporter Information *

Add Transporter

B. Designated Facility Information

EPA ID Number

VAR000503920

Name

MXI ENVIRONMENTAL SERVICES LLC

Site Address

26319 OLD TRAIL ROAD,
STATE ROUTE 879,
ABINGDON, VA 24210

Contact Phone *

276-628-6636

Extension

214

Can e-Sign?

Yes

9-13. Waste Information *

Add Waste Line

Add waste info and Proper Shipping Name



9-13. Waste Information

Add Waste Line



Add Waste Line

9. Hazardous Material and U.S. DOT Description

9a. Is this waste a Hazardous Material?

Yes

Does this waste contain PCBs?
Refer to 40 CFR §761.207

No

9b. U.S. DOT Description

ID Number / Proper Shipping Name *

Select Proper Shipping Name

This field is required.

Printed Dot Information

Add to Printed DOT Information

Emergency Response Guidebook Number



14. Special Handling Instructions and Additional Information

Special Handling Instructions for this Manifest

If this shipment contains residue or rejected waste from the previous shipment enter the Original Manifest Tracking Number

Reference Information for this Manifest

Optional for internal tracking, e.g. Customer # or Purchase Order #

[Add Reference Information](#)

15. Generator's / Offeror's Certification

17. Transporter Acknowledgement of Receipt of Materials

18. Discrepancy

Discrepancy features will be added in a future iteration.

19. Hazardous Waste Management Method Codes

Add or edit codes in Waste Characteristics table in "Section 9-13. Waste Information"

20. Designated Facility Owner or Operator

EPA ID Number

Name

Designated Facility Printed/Typed Name

Date Signed

VAR000503920

MXI ENVIRONMENTAL SERVICES LLC

MM/DD/YYYY



Attachment

Paper Manifest

To upload a new scanned manifest drag the manifest scan here or [browse for it](#)

Signing Manifest



15. Generator's / Offeror's Certification

EPA ID Number	Name
VA988177803	HEATING AND OIL

Sign

Cancel

Generator's/Offeror's Printed/Typed Name Date Signed

I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Accept

Decline

eSignature Widget

1. Authentication

Log into CDX

User:

SDONNELL80

Password:

••••••••••

Show Password ☐

Welcome Stephen Donnelly

2. Verification

Question:

What is your favorite TV show?

Answer:

••••

Show Answer ☐

Correct Answer

3. Sign File

Sign

Electronic Signature



Hint.... Do not wait until the day of the pickup!!!

[My Profile](#)[My Site Permissions](#)[My e-Signature Agreement](#)[My Request History](#)[My Notes](#)[My Events](#)

My e-Signature Agreement Status

Status ⓘ

Pending (Paper)

Last Updated By

susie kenney <SCKENNEY>

Last Updated Date

09/07/2018 09:30:30 AM

Print e-Signature Agreement

U.S. Environmental Protection Agency ELECTRONIC SIGNATURE AGREEMENT

NON-PRODUCTION: Pre-Production

In accepting the electronic signature credential issued by the U.S. Environmental Protection Agency (EPA) to sign electronic documents submitted to EPA's Central Data Exchange (CDX), and as a representative for:

Electronic Signature Holder Company Information

Organization Name:	BAE
Address:	2302 fred road
City, State, Zip:	catonsville, MARYLAND 21228
Province:	
Country:	
Phone Number:	410-418-4880
E-mail Address:	skenney@hazardouswastepros.com

Activate Windows

Go to Settings to activate Windows

Is DOT OK with e-manifest only in truck? - NO



10. How will use of e-Manifest relate to the Department of Transportation (DOT) hazardous material regulations (HMR) requirement to use a shipping paper?

EPA is coordinating with DOT during the development of e-Manifest. The system will generally allow a user to produce a manifest that satisfies the DOT HMR requirement for a shipping paper. One key point is that DOT currently requires that a hard copy shipping paper be placed in the cab of the transport vehicle during transportation. Therefore, handlers using e-Manifest will still need to comply with that requirement (e.g., print the manifest from the e-Manifest system).

Update from EPA - Functions



UPCOMING SYSTEM FUNCTIONALITY

■ **Planned Functionality**

- Corrections – allows industry handlers to correct manifest data
 - Pre-production: Week of September 13th
 - Production: Based on user feedback, towards end of September
- Broker – allow users to prepare manifest for a site
 - Pre-production - Fall
- Transporters create manifest
 - Pre-production – Fall
- Public reports (via RCRAInfo Web) – **coming September 30!**

Update from EPA - Common Issues



COMMON ISSUES (AND WHAT TO DO ABOUT IT)

- **Issue #1: Failing the Lexus Nexus check for electronic signature agreements**
 - Use your personal address (not your work address)
 - Pay attention to your birthday :o)
 - You can try three times within a 24 hour period
- **Issue #2: Some facilities hesitant to indicate “hazardous waste codes” in Box 13 (e.g., because they don’t manage “hazardous waste”)**
 - Modified Box 13 on the electronic form to match Box 13 on the paper form – Box 13 now appropriately titled “Waste Codes”

Update from EPA - Common Issues



COMMON ISSUES (AND WHAT TO DO ABOUT IT)

e-Manifest

- **Issue #3: Receiving facilities mailing top copy manifests to states**
 - All top copies should go to EPA.
 - (Some states may continue to collect paper copies of the generator copy.)

FAQs

What about non-hazardous and universal wastes?

- *e-Manifest extends to all federally and state-regulated wastes requiring manifests*
- *It is acceptable to ship non-hazardous wastes with hazardous wastes on the same hazardous waste manifest.*
- *Avoid using e-manifest for non-hazardous waste shipments. Doing so could give rise to confusion and fee issues.*

What about VSQG, CESQG?

- *No EPA ID = exemption exists for these sites to not use a manifest and therefore don't need to use it. Can use a paper manifest if need to send a state that does not recognize the CESQG exemption*
- *Additionally, under the Generator Improvement Rule allowing VSQG to ship off site to a LQG, VSQG are not required to ship using a RCRA manifest and therefore are not subject to e-Manifest requirements.*

The END



THE END!!!

THANK YOU for LISTENING!!!

Susan C. Kenney, CHMM
President, Bay Associates Environmental, Inc.

skenney@hazardouswastepros.com

Phone: 410-418-4880

Cell: 410-404-3227

*Special thanks to Joel, Sarah, Paul, Steve, Michael and Isaiah
for awesome recent updates at National AHMP.*

What I learn in Reno, does not stay in Reno.

Additional source of great information:

www.epa.gov/e-manifest