



e-Manifest Update

June 30, 2018 is the date EPA has set to kickoff the new e-Manifest system. LEI would like to communicate our plan for implementing the e-Manifest, discuss the e-Manifest system's current operational status and provide resources where you may learn additional information about the e-Manifest system and process. The e-Manifest is only required for shipments requiring the use of a Hazardous Waste Manifest.

e-Manifest Options

Listed below are the possible options for submitting manifest data into the new e-Manifest system. The new regulations do not require the usage of the electronic Manifest, however fees increase with the usage of a paper manifest.

Electronic Manifests

- 1a. Fully electronic
- 1b. Hybrid electronic manifest

Paper Manifests

- 2a. Data file upload of paper manifest
- 2b. Image upload of paper manifest
- 2c. Mailed paper manifest

**Please visit the [e-Manifest Detailed](#) section of LEI's e-Manifest webpage for a more thorough description of these options.*

e-Manifest Implementation

On June 30th, LEI will initially use option 2a (Data file upload) for manifest and data submittal to EPA. However, we plan to move quickly to option 1b (Hybrid) for all shipments terminating at LEI and where LEI will be the only transporter.

To compensate for manifest fees, development costs and administrative costs, for manifests terminating at LEI, we will be charging the following fees per hazardous waste manifest:

- Hybrid / Fully Electronic Manifest - \$5
- All Other Manifests - \$9

LEI has diligently participated in the e-Manifest implementation process and has been actively testing and providing feedback to EPA since 2017. In 2016, we implemented a

new software system. This system provides us a platform with the data structure and technology necessary for future growth. It also safely and seamlessly integrates our software and data with external software systems. We are continuing to integrate our profiling and manifest system with EPA's servers, allowing for generator and manifest data to both pull and push between systems.

Current e-Manifest Status

Parts of the e-Manifest system are still in development. There are 2 methods of putting manifest data into the e-Manifest system:

1. Web User Interface (UI) via RCRAInfo
2. Automated Data Push via API.

The web user interface is well developed, however certain functions are still being constructed. In particular, the ability to electronically sign a Hybrid e-Manifest is not currently available. EPA is still actively rolling out changes and debugging the API data submittal, retrieval and signature processes that many destination facilities will ultimately use. LEI is currently testing all of our 2018 manifest data into the e-Manifest test environment and providing feedback to EPA. We are able to successfully create and submit much of our manifest data.

Paper Manifest Updates

The hazardous waste manifest is changing from a 6-part document to a 5-part document. Usage of the new manifest is to occur June 30th, 2018; EPA has said the previous version of the manifest could be used after this date but EPA "recommend(s) that users transition to the 5-copy forms as quickly as possible." (see Frequent Questions about e-Manifest "Scope" [Question 8](#))

Commitment

LEI remains committed to providing you safe, compliant and cost-effective environmental solutions. We are proud to be at the forefront of our industry in implementing the e-Manifest.

We will continue to provide you with updates on the e-Manifest as they come. If you have any questions related to the e-Manifest you can email e-manifest@lei.solutions. You may also visit our [e-Manifest webpage](#) for additional resources.

Sincerely,

Larry Fannaly
Vice-President Sales & Operations
LEI, Inc.