Hazardous Waste Rule Changes & RCRAInfo E-Manifest Registration

Noa Klein Solid & Hazardous Waste Branch Hawaii Department of Health November 7, 2024

AGENDA

- Proposed rule changes
- New E-manifest rules
- E-manifest registration



PROPOSED CHANGES

- Align state regulations with updates to the EPA's federal hazardous waste management program
- Update the after-hours phone number for contacting Department on-scene coordinators
- Apply emergency preparedness requirements to intermediate and reclamation facilities handling hazardous secondary materials
- Correct typographical errors and cross-references

New federal rules to adopt (JULY 1, 2022 TO JUNE 30, 2024)

(1) **Technical Corrections rule**

Technical corrections to three major federal rules that have already been adopted by the State via incorporation by reference of the federal rules.

(2) EPA Method 23

Allows owners and operators of certain boilers and furnaces that are burning or processing hazardous wastes to use of EPA method 23 as an alternative to determine emission rates of chlorinated dibenzo-p-dioxins (CDDs) and chlorinated dibenzofurans (CDFs).

Details of proposed changes

health.hawaii.gov/shwb/hazwaste/hwrules/update

• Explanation of proposed amendments

Proposed amendments (Ramseyer format)

<u>Public hearing notice</u>

PUBLIC HEARING & COMMENT

Opportunity to make oral public comments

- 10am November 13, 2024 @ Solid & Hazardous Waste Branch, 2827 Waimano Home Rd Pearl City
- Please arrive early. If parking lots above the building are full, or if you just enjoy walking, park at the top of the State Lab building parking lot (short & beautiful but steep walk)

Written public comments by November 20, 2024

 Email noa.klein@doh.hawaii.gov, hand delivery, postal mail





QUESTIONS??

NEW E-MANIFEST RULES

"E-Manifest Third Rule"

- . RCRAInfo registration requirement
- . Manifest report timeframes changed
- . Manifest corrections must be completed within 30 days
- . Changes to manifest form
- . PCB manifest clarifications



- . Exception reports and other manifest reports submitted electronically
- . Exporters must submit export manifests to E-manifest
- . Other changes related to import/export documentation

DECEMBER 1, 2025

RCRAInfo registration requirement for SQGs and LQGs

- At least one staff person must have E-manifest Certifier or Site Manager permissions
- Receiving facilities will stop mailing paper copies of manifests back to generators and you will receive your final manifest copy in E-manifest
- E-manifest Certifier or Site Manager permissions allow you to certify corrections on a manifest and will allow you to submit electronic exception reports beginning December 1, 2025

Manifest report timeframes changed

- LQG exception report changed to 60 days (make inquiries within 45 days, report after 60 days)
- Discrepancy report changed to 20 days

Manifest corrections must be completed within 30 days of regulator request (applies to all parties on manifest)

Changes to manifest form

- 。4 copies
- International shipment section moved to continuation sheet item 33

PCB manifest clarifications

E-manifest requirements apply to PCB manifests

DECEMBER 1, 2025

Exception reports must be submitted electronically in RCRAInfo (& discrepancy report, unmanifested waste report)

Exporters must submit export manifests to E-manifest

- 。Exporter may be generator, TSDF, or recognized trader
- Last transporter who transports export shipment out of the US must provide export manifest and continuation sheet to the exporter (instead of the generator; generators receive their copy in E-manifest)

Other changes related to import/export documentation

- RCRAInfo registration requirement (SQGs, LQGs)
- LQG exception report 60 days
- . Manifest corrections ≤30 days
- . Changes to manifest form
- . PCB manifest clarifications



- . Exception reports and other manifest reports submitted electronically
- . Exporters must submit export manifests to E-manifest
- . Other changes related to import/export documentation

DECEMBER 1, 2025

More on e-Manifest rule

- EPA's summary of the new E-manifest rule and link to read the rule in the Federal Register
- EPA webinar on new E-manifest rule (recorded July 17, 2024)
- Slides from recorded webinar
- EPA's main E-manifest page, including Frequently Asked Questions

QUESTIONS??

RCRAINFO E-MANIFEST

REGISTRATION



RCRAInfo E-Manifest

1) Set up RCRAInfo account

- Create or link to Login.gov account
- 2) Request e-Manifest permissions for your site(s)
 - $\circ~$ Search for your site

RCRAInfo Account a.k.a. RCRAInfo Industry Application (RIA)

- rcrainfo.epa.gov
- If you have a CDX account, you can sign in & you don't need a new account
- Register > Industry User Registration
- Login.gov
 - Sign in or create new account
 Multi-factor authentication

Request Site Permissions

- 1) Search using EPA ID number
- 2) Select check box on left
- 3) Request permissions

Permission Levels

Site Management	None	Active		
Annual Report	None	Viewer	Preparer	Certifier
Biennial Report	None	Viewer	Preparer	Certifier
e-Manifest	None	Viewer	Preparer	Certifier
myRCRAid	None	Viewer	Preparer	Certifier
WIETS	None	Viewer	Preparer	Certifier

QUESTIONS??

THANK YOU

health.hawaii.gov/shwb/hazwaste

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