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Data Quality Issues Within the Hazardous Waste e-Manifest System: Association for State & Territorial Solid Waste Management Officials Position Paper

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The Association for State and Territorial Solid Waste Management Officials (“ASTSWMO”) published a position paper titled:

DATA QUALITY ISSUES WITHIN THE HAZARDOUS WASTE e-MANIFEST SYSTEM (“Position Paper”).

ASTSWMO describes itself as an organization of 50 states, 5 territories, and the District of Columbia whose mission is to enhance and promote effective state and territorial programs to affect relevant national policies for waste and materials management, environmentally sustainable practices, and environmental restoration.

The Resource Conservation and Recovery Act (“RCRA”) cradle-to-grave hazardous waste tracking system attempts to ensure that such hazardous waste is properly generated, transported, and treated or disposed.

The cradle-to-grave system has always been a key component of RCRA.

A generator after determining what “hazardous waste” is, has been required to prepare manifests to accompany the movement of material from the point of generation through transportation and then to the receiving facility/treatment, storage, or disposal facility.

Federal legislation enacted in 2012 tasked EPA with the development of a national electronic manifest system. Further, it authorized the federal agency to assess the costs of developing and operating an e-Manifest system from user fees. Such fees would be charged to those who use hazardous waste manifests to track off-shipments of their waste.

The e-Manifest system is a national database that similarly tracks hazardous waste shipments. It was launched by EPA in 2018. The goal of the e-Manifest system is to improve access to higher quality and timely data while also saving time and resources for industry and state and territorial programs.

The ASTSWMO Position Paper states that the organization “continues to support the e-Manifest system and believes that overall the system has been a success and provides valuable data to State regulatory agencies.

The Position Paper notes that:

...Having access to manifest data electronically allows for better allocation of resources as data can be used to guide informed decisions.

An ASTSWMO Hazardous Waste Subcommittee Task Force is stated to have received feedback from states with concerns regarding data quality in the e-Manifest system and how the data affects the hazardous waste programs. Therefore, the Task Force is stated to have developed a project to determine the scope of the data quality concerns raised by the states.

This is noted to include the random review of approximately 50 manifests in the e-Manifest system for waste that was shipped by a generator in their state between May 2022 and May 2023. Further, the review is stated to have included different hazardous waste generator categories, industries, generator types, and designated facilities.

The Position Paper contains charts and graphs that provides the results of this review.

Examples of data identified by the Task Force in the e-Manifest system that were either missing or not matching the scanned image of the manifest are stated to have included:

- Generator EPA ID number, name and/or address.
- Only one transporter identified in the electronic data upload, but multiple transporters on the paper copy or vice versa.
- Designated Facility EPA ID number, name and/or address.
- Waste description, container type, waste quantity and/or waste codes.
- Special Handling instructions not entered into the e-Manifest system.
- Signatures, extra signatures, or “signature on file” instead of a name of the employee signing the manifest.

The Position Paper notes the organization’s appreciation for its partnership with EPA and the support to the states and the regulated community. However, it provides four categories of recommendations for improving e-Manifest data quality which include:

- Regulatory.
- Enforcement.
- Outreach.
- Guidance.

A copy of the Position Paper can be downloaded [here](#).