



June 17, 2019

US Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Docket No. EPA-HQ-OLEM-2019-0194

Dear Sir or Madam:

The Cement Kiln Recycling Coalition (CKRC) appreciates the opportunity to provide comments to the U.S. Environmental Protection Agency (EPA) for the Hazardous Waste Electronic System (e-Manifest) Advisory Board to consider during its upcoming meeting. CKRC is a national trade association representing cement manufacturers in the U.S. that recycle the value in energy-bearing secondary materials by using them as fuel in kilns that produce portland cement. In addition, CKRC represents companies that collect, process, manage, and market alternative fuels for use in cement kilns as well as companies that provide consulting services to the industry. Below please find some suggestions for improvements that could be made to help increase the adoption of the e-Manifest system. While some issues may be specific to entities already in the e-Manifest system such as Treatment, Storage, and Disposal Facilities (TSDFs), CKRC believes that improving the system for those already implementing it will make it easier for them to encourage others to participate.

Functioning Biennial Reporting Portion of e-Manifest Will Speed Adoption

A functioning Biennial Reporting portion in the e-Manifest System would likely help increase the adoption of the e-Manifest system because of the significant benefits it would provide ALL users (as well as EPA and states) with cost, time and paper savings by not having to generate a separate Biennial Report.

Improve System Communications /Support to Enhance Adoption

More proactive, clear communications and improved technical support would go a long way to help encourage current and future users of the e-Manifest system.

Proactive communications when the EPA site is down or is having issues.

- Daily monitoring of the EPA web site and daily reporting if there is an issue via an urgent email to all users, not just Listserv
- Daily status update via a website

- Proper contact information from EPA: names, phone numbers, email addresses

Proactive communication re: items currently in progress

- Sent to all users, not only to Listserv
- Alternatively, create an alternate mailing list of users for status items that is separate from the Listserv where development issues are raised.
- Provide a link to a website that shows: Items/Changes in Progress, Testing, Testing Completed and Implemented. Such a link could be provided via either the e-Manifest web site or Listserv, or both.
- Information should be provided in plain English for users. It is important to not have to "go find" or to have to understand programming language to understand what is going on.

Detailed list of Error Types

- Clear communication of what a particular error is when a user gets an error message.
 - Sometimes takes hours trying to figure out why exactly a submission did not go through and what exactly an error message means

Improve Payment Process

Improving the e-Manifest payment process enhances the overall system, making it easier to encourage other entities to adopt it.

- Provide an ability to combine payments for one company that owns multiple TSDFs.
 - Having one invoice each month, as opposed to companies paying each facility invoice separately would be very valuable.
- If combined payments cannot be allowed, then provide the ability to register the company bank account information once rather than every time, for every site.
- Provide the ability for the bill to go directly to an accounts payable e-mail address, not just the site manager.

Improving and Simplifying the Signature Process would Help Increase Adoption

- Providing the necessary option to sign "on behalf" would serve to encourage participation in the e-Manifest program.
- Simplify the signature process and move away from the CROMER requirements.
- Make the system more accessible, user-friendly and affordable for transporter entities.
 - An interactive dialogue may be helpful to discuss options for improvement in these last two areas.

Constructive Not Punitive Compliance for a Limited Learning Period Would Encourage Adoption

Users might be encouraged to adopt the e-Manifest system if EPA provided some flexibility or a grace period (at least until EPA has completed all of the modules and system enhancements for a reasonable extended amount of time, TBD) in which compliance is not punitive but

constructive when inspecting facilities for compliance with the EPA e-Manifest system. The industry companies are continuing to adopt new modules when completed by EPA and learn/train on them for implementation and compliance.

Thank you for the opportunity to provide these comments on ways that could help improve and/or increase adoption of the e-Manifest system. Should you have questions or need additional information, please contact me.

Sincerely,

/s/ Michelle Lusk

Michelle Lusk
Executive Director
Cement Kiln Recycling Coalition