



October 1, 2019

Re: Increase to EPA's e-Manifest Fee and to Recovery Fee covering Toll increases

Dear Customer:

Let me take this opportunity to update you regarding changes to the Environmental Protection Agency (EPA) e-Manifest mandate, as well as a change in our base recovery fee to reflect the steady cost increases we have experienced in tolls nationwide.

### **e-Manifest Background**

The Hazardous Waste Electronic Manifest Establishment Act, signed into law on October 5, 2012, authorized the EPA to establish an automated national information technology system, e-Manifest. The system enables the agency, hazardous waste industry and U.S. states to utilize a more streamlined and efficient method to track and manage hazardous waste shipments.

The EPA is increasing user fees as of October 1<sup>st</sup> 2019 to pay for the cost to operate, maintain and upgrade the system. The fees, as has been the case, will be collected by TSDf owners and forwarded to the EPA.

No changes in manifest processing are imminent. You will continue to sign the manifest as you do now, and still may have to provide states with copies of paper manifests, but not e-Manifests. And, you will still need to comply with the three-year document retention period for paper manifests. Emerald Environmental will complete the remainder of the shipment tracking electronically in e-Manifest with electronic signatures and electronic transmissions to the CDX system. As a result of the EPA step up in price, the cost will now be \$20.00 per manifest, beginning October 1, 2019.

We continue to actively work with the EPA in support of the "hybrid" or mixed paper/electronic manifest. With this approach we would print a paper copy of the manifest for you to sign and retain on-site as the initial manifest copy. We will complete the remainder of the shipment tracking electronically in e-Manifest with electronic signatures and electronic transmissions to the CDX system. However, because of the complexities associated with hybrid manifests, we do not expect this option to be viable in the near term.

### **Recovery Fee Increase**

We have incurred significant increases in tolls across North America. In recent years, various government entities have implemented new tolls or raised existing tolls for highways, bridges and tunnels. In just the past two years alone, we estimate that our toll costs, which we cover through our recovery fee, have risen by 23%. To cover this substantial escalation of our costs, Emerald Environmental will increase our base recovery fee by 0.5% effective October 1<sup>st</sup> 2019.

The increases in both your e-Manifest and recovery fee reflect expenses that we need to pass along. We remain committed to delivering superior services and risk management, and your business and feedback are important to us. Should you have any questions, please contact your sales or customer service representative.

Regards,

A handwritten signature in black ink, appearing to read 'K. Hayden', written in a cursive style.

Kevin Hayden  
EVP Environmental Services