Message

From: Eby, Nicole [nicole.eby@dnr.mo.gov]
Sent: 4/29/2020 2:03:35 PM
To: Matthews, Marc [Matthews.Marc@epa.gov]
Subject: RE: Need for national guidance for signing paper manifests during COVID-19?

Thanks Marc.

Nicole Eby, Unit Chief
Waste Management Program
Department of Natural Resources
573-751-2347
nicole.eby@dnr.mo.gov

We'd like your feedback on the service you received from the Missouri Department of Natural Resources. Please consider taking a few minutes to complete the department's Customer Satisfaction Survey at https://www.surveymonkey.com/r/MoDNRsurvey. Thank you.

From: Matthews, Marc <Matthews.Marc@epa.gov>
Sent: Wednesday, April 29, 2020 7:08 AM
To: Eby, Nicole <nicole.eby@dnr.mo.gov>
Subject: FW: Need for national guidance for signing paper manifests during COVID-19?

Nicole,

Please see the email chain below for details. Rebecca sent this directly to David Green, but I thought you should be aware of the request.

Thanks,

Marc A. Matthews
USEPA/Region 7/ECAD/CB/RCRA
Phone: 913-551-7517
E-mail: matthews.marc@epa.gov

From: Wenner, Rebecca <wenner.rebecca@epa.gov>
Sent: Monday, April 27, 2020 2:07 PM
To: Rivas, Marcus <Rivas.Marcus@epa.gov>; Brian Burbeck <Brian.Burbeck@ks.gov>; Christine Mennicke <Christine.Mennicke@ks.gov>; **david.green@dnr.mo.gov**; Jeff Edwards <jeffery.edwards@nebraska.gov>
Cc: Matthews, Marc <Matthews.Marc@epa.gov>; Martin, Mike <Martin.Mike@epa.gov>; Snowden, Kevin <Snowden.Kevin@epa.gov>; Johnson, Susan [DNR] <susan.johnson@dnr.iowa.gov>
Subject: FW: Need for national guidance for signing paper manifests during COVID-19?

e-manifest coordinators,

Please see Amanda Kohler's email below. If your state has issued any guidance regarding signing paper manifests during the pandemic, please send me a copy. If you have an opinion about whether or not EPA should issue national guidance, and what it should say, please send me that as well.

Thanks for your time and stay well!

Rebecca Wenner
USEPA/Region 7/ ECAD/CB/RCRA
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Lenexa, Kansas 66219
Phone: 913-551-7644
E-mail: wenner.rebecca@epa.gov

From: Kohler, Amanda <Kohler.Amanda@epa.gov>
Sent: Monday, April 27, 2020 1:56 PM
To:
Subject: Need for national guidance for signing paper manifests during COVID-19?

e-Manifest Regional Implementation Team,

I'm checking in with you on whether there is sufficient need for EPA to develop stand-alone guidance for signing paper manifests during the COVID-19 pandemic.

As you know, the Office of Enforcement and Compliance Assurance (OECA) has already issued a temporary policy relating to enforcement discretion during COVID-19. In addition, some states have already offered specific guidance on signing paper manifests. However, we've heard from one industry trade association and at least one Region that federal guidance would be helpful so as to provide consistency nationally and to avoid the need for companies to request guidance from all the different Regions and states.

Some considerations: Any national guidance that we would issue specific to signing paper manifests would be developed in coordination with our Office of General Counsel and likely need approval and signature by Susan Bodine, Assistant Administrator of OECA. This is to say that it may take some time (hopefully, not a lot!) and, depending on the process, may or may not constrain practices that industry is already using or conflict with guidance that states have already put out there.

That said, can you **please let me know your thoughts (feel free to check in with your states) by COB Friday, May 1, regarding whether national guidance on signing paper manifests during COVID-19 would be helpful**? Also, if your states have already provided guidance in this area, please forward to me!

Thank you,

Amanda Kohler
703-347-8975