



EPA Hazardous Waste Exports –  
Transitioning to Electronic Filing  
at the Border  
June 5, 2017



# RCRA Export Border Process Transition

- **Mandatory Transition** – As of 12/31/16, hazardous waste export requirements includes a mandatory transition from paper to electronic at the border for individual shipments in 40 CFR 262.83(a)(6).

## **Old paper process**

Attach paper documentation of consent (e.g., Acknowledgement of Consent letter or movement document) to the RCRA manifest, or to shipping papers if waste is exempted (e.g. SLABs and universal waste);

Provide transporter with additional copy of RCRA manifest and instruct transporter via mail, email or fax to deliver that copy to the U.S. Customs official at the point the hazardous waste leaves the United States.

## **New electronic process**

Submit Electronic Export Information (EEI) for each shipment to the Automated Export System (AES\*) in accordance with 15 CFR 30.4(b), and include EPA-specific information along with the other information required under 15 CFR 30.6.

EPA's Acknowledgement of Consent letter is the equivalent of an export license defined in 15 CFR 30.1, so exporters are required to submit Electronic Export Information (EEI) for each export shipment per 15 CFR 30.2(a)(iv)(F) regardless of shipment value or destination country.

\*AES is run by U.S. Customs and Border Protection

# Transition Status



	October-16	November-16	December-16	January-17	February-17	March-17
Export Filings	1,908	1,803	1,731	1,901	1,757	1,809
% expected	46%	43%	42%	46%	42%	44%

↑ Pilot ended, transition period began. – 12/31/2016



- During the transition period, exporters can
  - (1) solely follow the paper process
  - (2) solely follow the electronic process
  - (3) test file in AES per the electronic process while instructing the transporter to follow the paper process.
- So far, no significant jump in filings. Do not wait, File Now!
- When the transition period ends, no later than 12/31/17, U.S. exporters MUST follow the electronic process.

***BEFORE you file – Test!  
Make sure you can pass the automatic  
checks in AES***

# What to file....



- **EPA License Required Indicator** - If 'Y', information below is required.
- **EPA Consent Number** - Consent number, including waste stream number, from the Acknowledgement of Consent Letter is mandatory.
  - For example: if your consent number for waste stream one is 007071/12E/13.001, you would remove special characters and provide 007071E13001.
- **RCRA Hazardous Waste Manifest Tracking Number** - EPA RCRA Hazardous Waste Manifest Number (OMB Form # 8700-22) associated with the export is conditionally required if waste is required to be RCRA manifested (not CBP manifested) within the United States.
  - For example: 000024109FLE.
- **EPA Net Quantity Unit of Measure** - Conditionally required if neither CL1 nor CL2 quantity are in units of weight or volume. KG are required if waste is solid, L is required if waste is liquid or sludge.
- **EPA Net Quantity** - Quantity of the export for Unit of Measure provided. Conditionally required if neither CL1 nor CL2 quantity are in units of weight or volume.
  - For example: 000000100.

# EDI Format



## Field Layout for PGA and EPA License Info AESTIR PGA Line

PGAEP1Y007071E13001000024109FLEKKG000000100

License  
Required  
Indicator

EPA  
Consent  
Number

RCRA Haz Waste  
Manifest Tracking  
Number

EPA Net  
Quantity  
UOM

EPA Net  
Quantity

# X.12 Format



## Field Layout for PGA and EPA License Info AESTIR PGA Line

MAN\*ZZ\*EP1\*Y007071E13001000024109FLEKG000000100

License Required Indicator	EPA Consent Number	RCRA Haz Waste Manifest Tracking Number	EPA Net Quantity UOM	EPA Net Quantity
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## New Commodity Line Details Screen

Save Line

Delete Line

Add New Line

### Line 1 Details

Export Information Code \*

Please Select

Schedule B or HTS Number ◆  
[Schedule B Search Engine]

8548.10.0540

Commodity Description \*

1st Quantity ◆

1st UOM ◆

NO

2nd Quantity ◆

2nd UOM ◆

KG

Origin of Goods ◆

Please Select

Value of Goods (whole US Dollars) \*

Shipping Weight (whole Kilograms) ◆

ECCN ◆

License Type Code/License Exemption Code \*

Please Select

Does this filing require Participating Government agency data?

Yes  No

*Note: You may add multiple commodity lines by selecting **Add Line**.*



## EPA License Data Screen Input

### Line 1 Details

AMS - Agricultural Marketing Service

ATF - Bureau of Alcohol, Tobacco,  
Firearms and Explosives

DEA - Drug Enforcement Administration

EPA - Environmental Protection Agency

FWS - Fish and Wildlife Service

NMFS - National Marine Fisheries  
Service

TTB - Alcohol and Tobacco Tax and  
Trade Bureau

### EPA - Environmental Protection Agency

Is EPA data being reported?  Yes  No

EPA Consent #

007071E13001

RCRA Tracking #

000024109FLE

Net Quantity

000000100

Net Quantity UOM

KG





# Roles of Key Parties

## Exporter

- Know what you need to file
- Be able to provide all required information (electronically) to Broker/Filer



## Software Vendor

- Understand CBP and EPA AESTIR Information
- Program to meet AESTIR Standards
- Complete testing in CERT environment

## Broker/Filer

- Test internal systems for correct PGA Line data
- Test in CERT environment



# EPA Assistance

- To request conference call with EPA to test AES filing live with EPA on the line, contact Roy Chaudet or Beth Reichle at
  - [Chaudet.roy@epa.gov](mailto:Chaudet.roy@epa.gov)
  - [Beth.Reichle@cgifederal.com](mailto:Beth.Reichle@cgifederal.com)
- If you have any issues with AES filing, especially with specific commodity codes not being recognized as RCRA-subject codes, please let EPA know! Email Roy, Beth and Laura Coughlan ([coughlan.laura@epa.gov](mailto:coughlan.laura@epa.gov)) so that we can follow up with you.