



June 19, 2006

U.S. Environmental Protection Agency
Resource Conservation and Recovery Act Docket (5305T)
Attention Docket ID No.: EPA-HQ-RCRA-2001-0032
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE: Hazardous Waste Management System; Modification of the Hazardous Waste Manifest System; Notice of Data Availability and Request for Comment [71 Fed. Reg. 19842 (April 18, 2006)]

To Whom It May Concern:

IPC – Association Connecting Electronic Industries is pleased to submit following comments concerning the Environmental Protection Agency's (EPA's) above referenced Notice of Data Availability and Request for Comment on the Modification of the Hazardous Waste Manifest System.

IPC is a United States (U.S.) based international trade association for the electronic interconnection industry. IPC represents over 2,400 member companies, 75 percent of which are based in the U.S. Although IPC members include electronics giants, such as Intel, Hewlett Packard, and IBM, 60 percent of IPC members fall into the Small Business category. IPC members generate and ship hazardous waste and are therefore affected by any changes to manifest. IPC and its members support the development of options that provide for greater efficiency and cost savings to the manifest system.

IPC welcomes EPA's effort to streamline the existing manifest process by introducing an electronic manifest (e-manifest) system. The development of an EPA managed national e-manifest system may contribute to that goal. However, implementation often falls short of intention. The new rule could create unintended consequences such as unanticipated burdens, data security issues and compliance issues. Our members' concerns are summarized below.

The new rule may not achieve its intended goal of burden reduction. Our members are concerned that a system user may lose his or her work if the system crashes while he or she is using it. They also foresee that they may have to resort to alternative methods of producing a manifest if the e-manifest system is unavailable for a significant period of time, which could cause an additional burden to facilities. EPA may have overestimated the degree of burden reduction by failing to account for Department of Transportation (DOT) regulations. Under DOT rules, hazmat drivers still need to carry a hard copy of the manifest when transporting regulated wastes. In addition,



IPC members are concerned about fees associated with the centralized e-manifest system. Furthermore, the generators must have an option to use paper manifest if there are problems with the central e-manifest system. IPC believes EPA should conduct a full cost benefit analysis before adopting an e-manifest system.

We must also raise the issue of regulatory compliance. Our members are questioning whether they would be out of compliance when and if there are problems associated with the system. Similarly, our members are apprehensive that their facilities will be held responsible or out of compliance if data is lost in the middle of generating the e-manifest. IPC encourages EPA to clarify the compliance issue.

Furthermore, our members would like a re-examination of the security of the e-manifest system. Our members have misgivings about lost or stolen data and the potential inappropriate use of data by authorized or unauthorized users. Although EPA has considered security, our members still believe this is an issue.

IPC appreciates the opportunity to comment on the agency's Hazardous Waste Management System; Modification of the Hazardous Waste Manifest System. IPC appreciates EPA's goals of streamlining the hazardous waste manifest process, but we are concerned that burden reduction, data security and compliance issues associated with the new rule may not have been fully examined.

Sincerely,

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Environmental, Health and Safety Manager