



IDEM Update

Wednesday, March 28, 2018

Partners for Pollution Prevention Quarterly Meeting



Jennifer Collins, Manager
Pollution Prevention and Compliance Assistance Section
Office of Program Support (OPS)



IDEM Updates

Notable Staffing Changes

- Cameron Maschino, IDEM OPS Program Manager for CLEAN Community Challenge, Governor's Awards, and Toxics Release Inventory (TRI)

General Information

- [2018 Indiana Governor's Awards for Environmental Excellence:](#)
Nominations now being accepted until 5:00 PM on Monday, May 7, 2018
- [Environmental Stewardship Program \(ESP\):](#)
Spring application round occurs April 1 - May 31



Indiana Department of Environmental Management

Protecting Hoosiers and Our Environment Since 1986



IDEM's Compliance and Technical Assistance Program



Compliance and Technical
Assistance Program

Indiana Department of Environmental Management

Helping Indiana businesses one step at a time



The Compliance and Technical Assistance Program (CTAP) provides assistance to help Indiana businesses understand and comply with environmental regulations. It is important to note the following about CTAP assistance:

- **Nonregulatory** – CTAP staff members are not regulators and do not have regulatory authority. Therefore, businesses will not be penalized for reporting relevant environmental information to CTAP when requesting assistance.
- **Free and Confidential** – While CTAP staff members serve as liaisons between the regulatory programs and businesses, they do not provide any details about the company to regulators, as the information is protected under Indiana Code 13-28-3-4.



- **Assistance** – CTAP staff members provide assistance through on-site visits or via phone and will provide a full compliance review or just target a single issue. They also develop training programs, brochures, and webinars to help businesses understand the state and federal environmental regulations that affect them.
- **Multimedia** – CTAP staff members are knowledgeable in air, water, land, and Community Right-to-Know regulations and are happy to answer questions in these areas.

CTAP staff members provide assistance to businesses that contact them directly, are referred by regulatory inspectors or permit writers, or are impacted by a new U.S. Environmental Protection Agency or state regulation.

Contact CTAP if you need assistance

Hotline: (800) 988-7901 **Email:** CTAP@idem.IN.gov **Website:** www.idem.IN.gov/ctap



Regulatory Update

Compliance Dates and Requested Topics Discussion

Angela Taylor, CTAP Small Business Liaison
Pollution Prevention and Compliance Assistance Section
Office of Program Support



Upcoming Compliance Due Dates

CTAP maintains a list of [compliance due dates](#) for Indiana businesses, including all media/regulatory program areas of IDEM (land, air, water).



Upcoming Compliance Due Dates

Annual Reports and Other Requirements

[Industrial Storm Water Permitting \(327 IAC 15-6, Rule 6\):](#)

The initial Storm Water Annual Report and certification checklist is required under general permit rule 327 IAC 15-6 and is due on the anniversary of the submission of the Notice of Intent (NOI) letter.

[Municipal Separate Storm Sewer Systems \(MS4s\) \(327 IAC 15-13, Rule 13\):](#)

MS4s are required to submit annual reports. These reports are due every year of the permit cycle for an MS4 in the first term of their permit.

[Solid Waste:](#)

Final sludge samples for non-delegated water Pretreatment Programs are due within 30 days of obtaining the analytical results.



Upcoming Compliance Due Dates

Annual Reports and Other Requirements

Air Permitting:

Annual Notifications:

- Registrations – due no later than March 1
- SSOA – due no later than January 30
- MSOP – due no later than March 1

Annual Compliance Certification (ACC):

- FESOP – for Clark, Elkhart, Floyd, Lake, Marion, Porter, St. Joseph, and Vanderburgh counties, the ACC – due no later than April 15
- FESOP – for all other counties – due no later than July 1
- Title V (Part 70) – for Clark, Elkhart, Floyd, Lake, Marion, Porter, St. Joseph, and Vanderburgh counties, the ACC – due no later than April 15
- Title V (Part 70) for all other counties – due no later than July 1



Upcoming Compliance Due Dates

March 31:

[Annual Water Withdrawal Report](#) is due for facilities that have the capability of withdrawing more than 100,000 gallons of ground water, surface water, or ground and surface water combined in one (1) day. Note: this report goes to DNR's [Significant Water Withdrawal Program](#) and is not required to be submitted to IDEM.

April 1:

Annual Report due for delegated and non-delegated water Pretreatment Programs.

April 15:

[Air Annual Compliance Certification](#) due for companies in Clark, Elkhart, Floyd, Lake, Marion, Porter, St. Joseph, and Vanderburgh counties.

[Solid Waste Quarterly Reports](#) due.



Upcoming Compliance Due Dates

April 15:

MSOP Air Permit annual fees are due 30 days after the invoice is generated. All invoices are generated by the 15th of the previous month.

Solid waste management fee return has been combined with the solid waste disposal fee and is due quarterly (January 15, April 15, July 15, October 15). Forms will be mailed to applicable parties per the reporting schedule.

April 28:

Quarterly Non-Compliance Report due for delegated water Pretreatment Programs (unless otherwise permitted to submit report in May).

April 30:

Air Quarterly Deviation and Compliance Monitoring Report due for January through March. Check your permit to determine if you are on a quarterly or semiannual reporting schedule.

Quarterly Air Permit reports (e.g., usage reports) due for January through March.



Upcoming Compliance Due Dates

May 15:

[Underground Storage Tank \(UST\)](#) fee is due. If the UST owner fee is more than \$500, you can elect to pay the fee in four installments when you submit the first payment.

May 28:

Quarterly Non-Compliance Report due for those delegated water Pretreatment Programs allowed to submit in May (otherwise due in April).

June 30:

[Wastewater operator certification](#) renewal applications due (certifications expire every two years).

[Drinking water operator certification](#) renewal applications due (certifications expire every two years).



Rule and Policy Updates

- Indiana General Assembly – Indiana Register Documents (December 1, 2016 to present):
www.IN.gov/legislative/register/irtoc.htm
- IDEM, Office of Legal Council – Rules in Progress:
www.idem.IN.gov/legal/2334.htm
- IDEM, CTAP – Regulatory Updates:
www.idem.IN.gov/ctap/2331.htm



Environmental Rules Board

- Next Meeting / Public Hearing – April 11, 2018
- 1:30 PM in Conference Room A of Indiana Government Center South (IGCS) in Indianapolis, IN
- To attend a meeting, use the public entrance at 100 North Senate Avenue to gain access to the building



Requested Update Topics

- Hazardous Waste Generator Improvement Rule – State’s Adoption Status
- New U.S. EPA Policy on “Once in Always in” – Changes and How IDEM is Handling Permit Applications
- E-Manifesting



Hazardous Waste Generator Improvements Rule



U.S. EPA revised the Resource Conservation and Recovery Act (RCRA) regulations, called the Hazardous Waste Generator Improvements Rule (HWGIR), and the final version was published in the Federal Register (FR) on November 28, 2016. This final rule became effective at the federal level on May 30, 2017.



Hazardous Waste Generator Improvements Rule

- Indiana, as an authorized state, is required to adopt those provisions in the new rule that are more stringent than the current RCRA generator regulations in order to retain authorized status.
- Indiana has not yet adopted the new Hazardous Waste Generator Improvements Rule, and therefore, the federal rule changes are not currently recognized in Indiana.
- The rules that were in place in Indiana prior to the November federal adoption of the Hazardous Waste Generator Improvements Rule are still in effect.
- Indiana's first public notice regarding the adoption of the new rule is expected to be published in the first quarter of 2018.
- Indiana has until July 1, 2019 to adopt the more stringent portions of the revised regulation.



Hazardous Waste Generator Improvements Rule

- IDEM has been authorized by U.S. EPA to implement the majority of the federal RCRA hazardous waste management program provisions in Indiana (permitting and compliance).
- Indiana's hazardous waste management rules are codified at [329 IAC 3.1](#).
- Indiana has adopted most of the federal hazardous waste management standards codified federally at 40 CFR Parts 260-270, and 273 (the July 1, 2015, edition). Exceptions and additions to the federal rules are specifically noted in the state's hazardous waste management rules under:

329 IAC 3.1-1-7	References to the Code of Federal Regulations
329 IAC 3.1-1-8	References not Specifically Adopted
329 IAC 3.1-1-9	Conversion of Federal Terms
329 IAC 3.1-4	Definitions



Hazardous Waste Generator Improvements Rule

Major Rule Provisions

- Reorganization
- Hazardous Waste Determinations (§ 262.11)
- Hazardous Waste Counting (§ 262.13)
- Very Small Quantity Generator (VSQG) Requirements
 - Episodic Generation (part 262 subpart L)
 - Consolidation of VSQG Waste at Large Quantity Generators (LQGs) (Same Company) (§§ 262.14 & 17)
- Marking and Labeling (throughout generator regulations)
- Satellite Accumulation Areas (SAAs) (§ 262.15)
- SQG Re-notification (§ 262.18)
- Emergency planning & preparedness (§ 262.16 & part 262 subpart M)
- 50-foot waiver (§ 262.17)
- Reporting and Recordkeeping (§ 262.41)
- Closure (§ 262.17)



Hazardous Waste Generator Improvements Rule

More stringent:

- SQG re-notification
- SAAs subject to incompatibility and emergency preparedness & prevention requirements
- Identifying hazards of wastes being accumulated on labels and RCRA waste codes added prior to shipment
- Notification of closure
- Closure as a landfill for LQGs accumulating hazardous wastes in containers that cannot meet closure performance standards
- Biennial reporting for whole year, not just months the generator is an LQG
- Biennial reporting for recyclers who don't store prior to recycling
- Quick reference guide for contingency plans (LQG only)

Less stringent:

- VSQG consolidation
- Episodic generation
- Waiver from 50-foot rule



Hazardous Waste Generator Improvements Rule

Major Changes of HWGI Rule by Generator Category

New Provision	VSQG	SQG	LQG
Reorganization	X	X	X
LQG Consolidation of VSQG wastes	X		X
Episodic Generation	X	X	
50-foot Waiver			X
Marking & Labeling		X	X
Marking RCRA Waste Codes		X	X
SQG Re-notification		X	
Contingency Plan Quick Reference Guide			X
Closure Notification			X
Closure as Landfill if Can't Clean Close			X
BR Reporting by Recyclers Who Don't Store*		X	X



Hazardous Waste Generator Improvements Rule

Reorganization of Generator Regulations

Provision	Existing Citation	Final Citation
Generator Category Determination	§ 261.5(c)–(e)	§ 262.13
VSQG Provisions	§ 261.5(a), (b), (f)–(g)	§ 262.14
Satellite Accumulation Area Provisions	§ 262.34(c)	§ 262.15
SQG Provisions	§ 262.34(d)–(f)	§ 262.16
LQG Provisions	§ 262.34(a), (b), (g)–(i), (m)	§ 262.17

As part of this reorganization, conforming changes to citations that previously referenced § 261.5 and § 262.34.



Hazardous Waste Generator Improvements Rule

Hazardous Waste Counting (§ 262.13)

- A hazardous waste generator has always had to count their hazardous waste to determine what category of generator they are (VSQG, SQG, LQG).
- New § 262.13 clarifies the process for a generator to determine their generator category each calendar month for generators of acute hazardous waste, generators of non-acute hazardous waste, and generators that mix acute and non-acute hazardous wastes.
- This provision also discusses how mixing of hazardous waste with non-hazardous waste impacts generator category.



Hazardous Waste Generator Improvements Rule

Hazardous Waste Counting

Table 1 to § 262.13 – Generator Categories Based on Quantity of Waste Generated In A Calendar Month

Quantity of acute hazardous waste generated in a calendar month	Quantity of non-acute hazardous waste generated in a calendar month	Quantity of residues from a cleanup of acute hazardous waste generated in a calendar month	Generator Category
> 1 kg	Any amount	Any amount	Large quantity generator
Any amount	≥ 1,000 kg	Any amount	Large quantity generator
Any amount	Any amount	> 100 kg	Large quantity generator
≤ 1 kg	> 100 kg and < 1,000 kg	≤ 100 kg	Small quantity generator
≤ 1 kg	≤ 100 kg	≤ 100 kg	Very small quantity generator



Hazardous Waste Generator Improvements Rule

U.S. EPA Resources

- Main generator website:
www.epa.gov/hwgenerators
- Generator Improvements Rule website:
www.epa.gov/hwgenerators/final-rule-hazardous-waste-generator-improvements
- Link to the map of states that have adopted the new rule:
www.epa.gov/hwgenerators/where-hazardous-waste-generator-improvements-rule-effect

U.S. EPA plans to add FAQs and other implementation materials as needed and update existing guidance and resources as much as possible with new terms and citations.



The Clean Air Act – “Once in Always in” Policy

On Thursday, January 25, 2018, U.S. EPA issued a [guidance memorandum](#) withdrawing the “Once in Always in” policy for the classification of major sources of hazardous air pollutants (HAPs) under section 112 of the Clean Air Act. With the new guidance, sources of hazardous air pollutants (HAPs) previously classified as “major sources” may be reclassified as “area” sources when the facility limits its potential to emit below major source thresholds (10 tpy single HAP and/or 25 tpy combined HAPs).

In a 1995 memo, U.S. EPA established a “Once in Always in” policy that determined that any source subject to major source standards, such as National Emission Standards for Hazardous Air Pollutants (NESHAPs), would always remain subject to those standards, even if production processes changed or controls were implemented that eliminated or permanently reduced that facility’s potential to emit HAPs.




The Clean Air Act – “Once in Always in” Policy

IDEM’s Office of Air Quality is processing these requests the same as it would any other permitting change requests, as they are subject to the same rules, timeframes, and fees.

Every application should include, at a minimum:

- **Source created Cover Letter explaining the requested changes**
- **Application Cover Sheet (State Form 50639)**
- **General Source Data Application, GSD-01 (State Form 50640)**

 **AIR PERMIT APPLICATION COVER SHEET**
State Form 50639 (R4 / 1-10)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NOTES:

- The purpose of this cover sheet is to obtain the core information needed to process the air permit application. This cover sheet is required for all air permit applications submitted to IDEM, OAQ. Place this cover sheet on top of all subsequent forms and attachments that encompass your air permit application packet.
- Submit the completed air permit application packet, including all forms and attachments, to IDEM Air Permits Administration using the address in the upper right hand corner of this page.
- IDEM will send a bill to collect the filing fee and any other applicable fees.
- Detailed instructions for this form are available on the Air Permit Application Forms website.

1. Tax ID Number: _____

FOR OFFICE USE ONLY

PERMIT NUMBER: _____

DATE APPLICATION WAS RECEIVED: _____

IDEM – Office of Air Quality – Permits Branch
100 N. Senate Avenue, MC 61-53 Room 1003
Indianapolis, IN 46204-2251
Telephone: (317) 233-0178 or
Toll Free: 1-800-451-6027 x30178 (within Indiana)
Facsimile Number: (317) 232-6749
www.IN.gov/idem

PART A: Purpose of Application
Part A identifies the purpose of this air permit application. For the purposes of this form, the term “source” refers to the plant site as a whole and NOT to individual emissions units.


2. Source / Company Name: _____ **3. Plant ID:** _____

4. Billing Address: _____ **City:** _____ **State:** _____ **ZIP Code:** _____

5. Permit Level: ☐ Exemption ☐ Registration ☐ SSOA ☐ MSOP ☐ FESOP ☐ TVOP ☐ PBR

6. Application Summary: Check all that apply. Multiple permit numbers may be assigned as needed based on the choices selected below.

<input type="checkbox"/> Initial Permit	<input type="checkbox"/> Renewal of Operating Permit	<input type="checkbox"/> Asphalt General Permit
<input type="checkbox"/> Review Request	<input type="checkbox"/> Revocation of Operating Permit	<input type="checkbox"/> Alternate Emission Factor Request
<input type="checkbox"/> Interim Approval	<input type="checkbox"/> Relocation of Portable Source	<input type="checkbox"/> Acid Deposition (Phase II)

 **OAQ GENERAL SOURCE DATA APPLICATION**
GSD-01: Basic Source Level Information
State Form 50640 (R5 / 1-10)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NOTES:

- The purpose of GSD-01 is to provide essential information about the entire source of air pollutant emissions. GSD-01 is a required form.
- Detailed instructions for this form are available on the Air Permit Application Forms website.
- All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 326 IAC 17-1.4-1. Failure to follow these requirements exactly will result in your information becoming a public record, available for public inspection.

IDEM – Office of Air Quality – Permits Branch
100 N. Senate Avenue, MC 61-53 Room 1003
Indianapolis, IN 46204-2251
Telephone: (317) 233-0178 or
Toll Free: 1-800-451-6027 x30178 (within Indiana)
Facsimile Number: (317) 232-6749
www.IN.gov/idem

PART A: Source / Company Location Information

1. Source / Company Name: _____	2. Plant ID: _____
3. Location Address: _____	
City: _____	State: _____ ZIP Code: _____
4. County Name: _____	5. Township Name: _____
6. Geographic Coordinates: Latitude: _____ Longitude: _____	
7. Universal Transverse Mercator Coordinates (if known): Zone: _____ Horizontal: _____ Vertical: _____	
8. Adjacent States: Is the source located within 50 miles of an adjacent state? <input type="checkbox"/> No <input type="checkbox"/> Yes – Indicate Adjacent State(s): <input type="checkbox"/> Illinois (IL) <input type="checkbox"/> Michigan (MI) <input type="checkbox"/> Ohio (OH) <input type="checkbox"/> Kentucky (KY)	
9. Attainment Area Designation: Is the source located within a non-attainment area for any of the criteria air pollutants? <input type="checkbox"/> No <input type="checkbox"/> Yes – Indicate Nonattainment Pollutant(s): <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> NO _x <input type="checkbox"/> O ₃ <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> SO ₂	
10. Portable / Stationary: Is this a portable or stationary source? <input type="checkbox"/> Portable <input type="checkbox"/> Stationary	

PART B: Source Summary



The Clean Air Act – “Once in Always in” Policy

Important things to consider when seeking permit changes related to this policy change:

- When a source applies for a renewal, the Office of Air Quality (OAQ) Permits Branch will evaluate if the updated policy affects the source's NESHAP applicability even if not specifically requested in the application.
- If a source submits a permit modification/revision application, OAQ will make an effort to identify opportunities for changes in NESHAP applicability at that time, but sources should request such changes in the application when submitted.
- A source's permit level will not necessarily change after taking limits to be minor for HAPs unless HAP emissions were the determining factor for the source's permitting level (Title V).



The Clean Air Act – “Once in Always in” Policy

Important things to consider when seeking permit changes related to this policy change:

- 326 IAC 8-1-6 (VOC Reduction requirements – Best Available Control Technology (BACT)) exempts sources subject to the NESHAP requirements identified in 326 IAC 20-48 (Subpart VVVV) and 326 IAC 20-56 (Subpart WWWW), so if these requirements are removed from the permit, applicability of 326 IAC 8-1-6 would need to be evaluated.
- A source must still comply with the NESHAP requirements included in their permit even if the source has actual HAP emissions below the 10 and 25 TPY thresholds until they have applied for and obtained a permit modification/revision or new operating permit that imposes federally enforceable limits restricting the potential to emit of HAPS to less than these thresholds.



The Clean Air Act – “Once in Always in” Policy

Important things to consider when seeking permit changes related to this policy change:

- A source’s HAP emissions may still be regulated after the removal of Major Source NESHAP requirements. After becoming a minor source for HAPs, the source may be subject to Area Source NESHAPs, and/or state rules under 326 IAC 8 for VOCs (which often are also HAPs).

Example:

- ▶ A source is subject to the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM), because the source is an existing affected source that uses 250 gallons or more of coatings that contain HAPs in the surface coating of miscellaneous metal parts and products and is a major source of HAPs.
- ▶ This source decides to limit HAPs below 10/25 tpy and become “minor” under section 112 of the CAA .
- ▶ Because the source coats motor vehicle parts and uses at least one coating that contains cadmium (Cd), it is now subject to the NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH).



The Clean Air Act – “Once in Always in” Policy

Important things to consider when seeking permit changes related to this policy change:

- Which NESHAP has the least stringent requirements or is easiest for source compliance?
- How does this change affect compliance with or applicability to other NESHAPs? (e.g., the source was previously also subject to another NESHAP for major sources (40 CFR 63, Subpart PPPP)).
- What is the permit level of the source? Will it change (transition to lower level permit)?
- When is renewal timeframe? Calculate possible permit costs based on the level of change required to the permit and the timing. Will it be best to make the change in a modification request, or during scheduled renewal? If subject to a new federal rule (area source NESHAP), IDEM will charge for new rule applicability review regardless of when the change occurs. If done during renewal, no charge to change permit conditions. If done during modification, depending on the level, will require revision fee.



The Clean Air Act – “Once in Always in” Policy

CTAP Suggestions

- ✓ Review your permitting options.
- ✓ Create a list or table of “pros” and “cons” to making this change.
- ✓ Time your change request strategically (do you have other changes to make?).
- ✓ Confirm with product vendors and with the source operations staff that compliance with all proposed limits can be achieved.
- ✓ Evaluate if your company will still have “room to grow” or “wiggle room” for product orders that may require the use of higher HAP containing materials.
- ✓ Make sure to have compliance plans in place for proposed throughput limits – new recordkeeping will be required if federally enforceable limits are permitted.
- ✓ Call or email CTAP if you need help!



E-Manifesting

U.S. EPA is establishing a national system for tracking hazardous waste shipments electronically. This system, known as “e-Manifest,” will modernize the nation’s cradle-to-grave hazardous waste tracking process while saving valuable time, resources, and dollars for industry and states. U.S. EPA anticipates launching e-Manifest in June 2018.

U.S. EPA is establishing the e-Manifest system according to the [Hazardous Waste Electronic Manifest Establishment Act](#), enacted into law on October 5, 2012. The “e-Manifest Act” authorizes U.S. EPA to implement a national electronic manifest system and required that the costs of developing and operating the new e-Manifest system be recovered from user fees charged to those who use hazardous waste manifests to track off-site shipments of their wastes.

U.S. EPA is currently in the process of finalizing the methodology for setting user fees based on the costs of processing manifests.



E-Manifesting

- The manifest shows the chain of custody of all waste handlers from “cradle to grave.”
- Documents off-site shipments of hazardous wastes that are designated for and arrive at facilities authorized to manage them.
- The manifest serves as the “shipping document” under both hazardous materials law and the RCRA Subtitle C transportation requirements.
- Benefits include:
 - Cost Savings
 - Creation of a single hub for one-stop reporting of manifest data to U.S. EPA and states
 - Accurate and more timely information on waste shipments
 - Rapid notification of discrepancies or other problems related to a particular shipment
 - Increased effectiveness of monitoring of waste shipments by regulators
 - The potential for integrating manifest reporting with Resource Conservation and Recovery Act (RCRA) biennial reporting process and other federal and state information systems



E-Manifesting

- e-Manifest will launch in June 2018.
 - System is and will be available for testing through Spring 2018.
- e-Manifest will take effect everywhere at the same time (all states).
- All destination facilities that receive hazardous waste or state-only hazardous waste on a manifest must submit those manifests to U.S.EPA either in paper or electronically
 - An associated fee will be charged for each manifest submission.
- Once the system launches, states, tribes, and the public can receive manifest data from e-Manifest.
- Handlers will be required to register for e-Manifest to submit electronically and to make corrections.



E-Manifesting

- **Get Engaged**

- Submit input/questions to: eManifest@epa.gov
- Subscribe to the general interest e-Manifest ListServ
 - Send a blank message to:
eManifest-subscribe@lists.epa.gov
- Attend U.S. EPA's monthly webinars

- **Test the e-Manifest system**

- For more information, see U.S. EPA's [e-Manifest website](#)
- U.S. EPA is continuously refining the system in response to user feedback



E-Manifesting

Currently the U.S. EPA E-Manifest system does **NOT** integrate the manifest reporting with RCRA annual and biennial reporting.

The Annual Manifest and Biennial Hazardous Waste reports document the types and amounts of RCRA hazardous wastes that are generated, shipped off-site, treated on-site and/or received from off-site.

All RCRA Annual Manifest and Biennial Hazardous Waste reports should be submitted electronically to IDEM using the [ARM Easitrak](#) software.



E-Manifesting

Submittal of Annual Manifest and Biennial Hazardous Waste reports to IDEM:

- The [ARM Easitrak](#) software must be used to file electronic reports.
- If you submit electronically, the Handler ID form must still be sent in hard copy.
- The Declaration of Electronic Reporting must also be submitted. This is found in the 'reports' tab of Easitrak.
- The Handler ID form and the Declaration form should be sent at the same time and **after** you submit the report electronically.
- The Easitrak Site Identification form (SI) must be completed online but should **NOT** be sent in place of the Indiana Handler ID form.
- The instructions found at the Easitrak site are generic instructions for multiple states who use the software. You should read the [Indiana specific instructions](#) for Easitrak and for the Annual or Biennial report before using the software.

Submitters with their own data systems that can create flat files may submit files in the specified format. Contact IDEM at (317) 233-0066, or via email at olqregulatoryreporting@idem.in.gov for a copy of the flat file specifications.



Environmental Management



The next training modules are coming soon!

- Pollution Prevention (P2) for Businesses is CTAP's next E101 training.
- Followed by The Storage Tanks: Compliance, Planning, and Spill Response module.

Training dates are being planned for April and May 2018 for P2, and August and September 2018 for Tanks. Registration information will be posted on the website, or you can [email CTAP](#) to get on our E101 emailing list.



E101 website
www.idem.IN.gov/ctap/2471.htm



Questions?



ANGELA TAYLOR

CTAP SMALL BUSINESS LIAISON

OFFICE OF PROGRAM SUPPORT

POLLUTION PREVENTION AND COMPLIANCE

ASSISTANCE SECTION

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