

e-Manifest

Monthly Webinar
April 26, 2017



Overview

- ▶ The Electronic Hazardous Waste Manifest System (e-Manifest) is a new system that allows
 - ▶ Industry Hazardous Waste Handlers to submit Uniform Hazardous Waste Manifest Forms, either electronically or on paper, to EPA
 - ▶ States/Regions to retrieve the collected manifest data electronically
- ▶ E-Enterprise and e-Manifest
 - ▶ To optimize limited resources, e-Manifest will leverage shared services from other systems under e-Enterprise including: Resource Conservation and Recovery Act Information System (RCRAInfo), Central Data Exchange (CDX) and efficient solutions for electronic signatures
 - ▶ Both E-Enterprise and e-Manifest align with Administrator's "Cooperative Federalism" Vision for effective partnerships with states and tribes

Anticipated Result

EPA estimates the national e-Manifest system will ultimately reduce the burden associated with preparing shipping manifests by 300,000 to 700,000 hours and result in cost savings of more than \$90 million per year for states and industry.



e-Manifest is a Multi-Faceted Project

▶ System development

- ▶ **Fall 2016 to Early 2017** – Development and release of Phase 1 of e-Manifest. Web application, user administration and services.
- ▶ **Early 2017 to June 2017** – Testing and refinement of Phase 1, with deployment to the pre-production environment for further user testing planned for June 2017. EPA is requesting testers on a rolling basis as part of the user-centered design strategy.
- ▶ **July 2017 to Spring 2018** – Testing and refinement of pre-launch system.

▶ Regulatory development

- ▶ One Year rule - authorized use of electronic manifests, 2/14
- ▶ User Fee rule - sets methodology for user fees
- ▶ Expect to issue final rule in December 2017

▶ e-Manifest Advisory Board

- ▶ First meeting in 1/2017
- ▶ Next meeting 9/2017

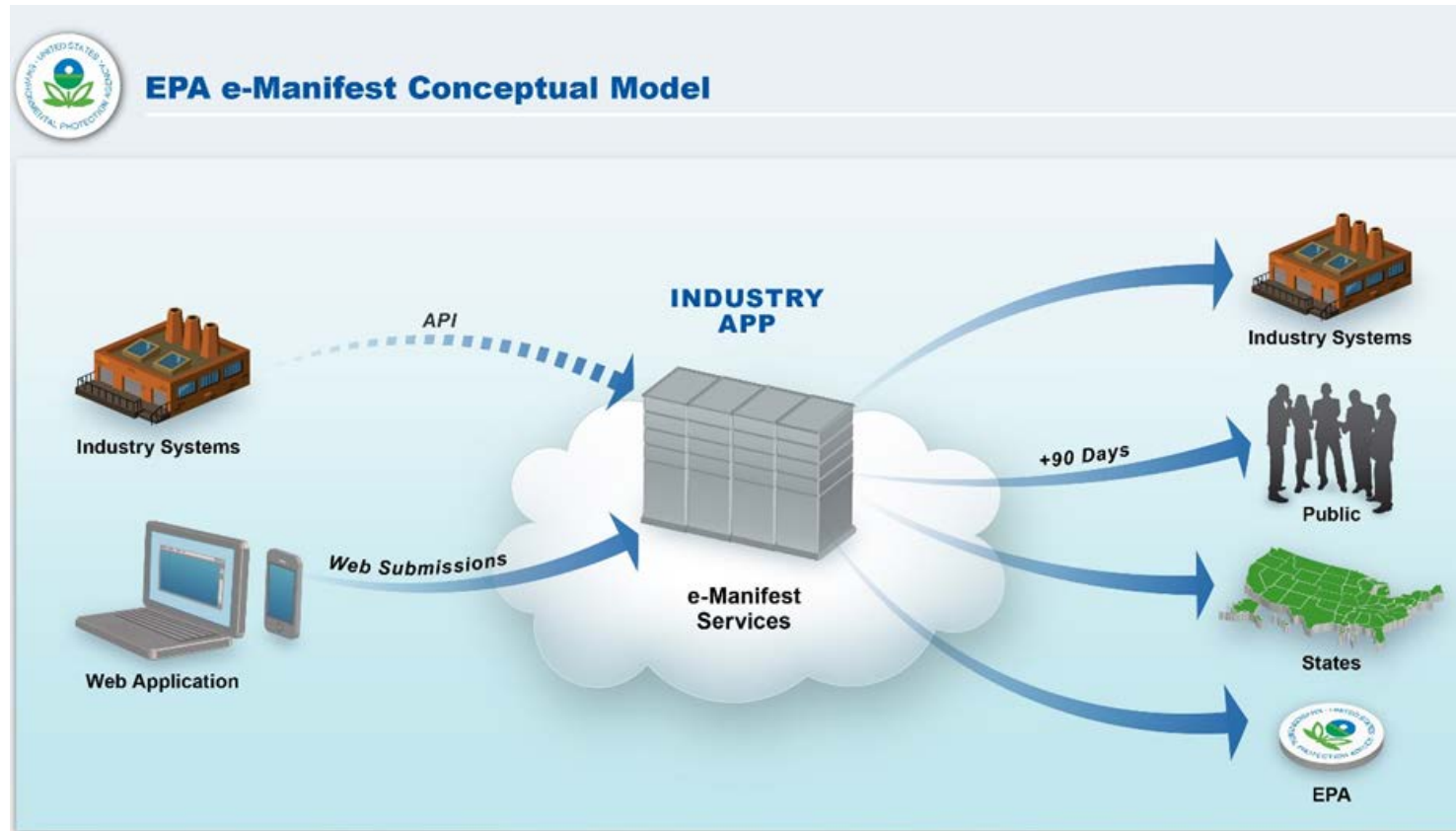
▶ Stakeholder Engagement Plan

- ▶ Ensures stakeholders are prepared for transition

▶ Roles of Regions and States

System Demonstration - Generator

- ▶ How a generator uses the e-Manifest web application
- ▶ Currently in second round of user testing
- ▶ For more information, contact eManifest@epa.gov





e-Manifest is device aware

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devngn.epacdxnode.net

RCRA Info

My Sites / VA0000010264 / e-Manifest Dashboard / e-Manifest

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General Information

Manifest Tracking Number
100001382ELC

International Shipment (Import Only) No

Status

Draft - Visible only to users registered for this site

Pending - Shared with users registered for the Generator, Transporters and Designated Facility selected below

1-5. Generator Information

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RCRA Info

1-5. Generator Information

EPA ID Number *
VA0000010264

Name
ROY'S AUTO BODY

Mailing Address *
4919 VALLEY PIKE,
STEPHENS CITY, VA 22655

Site Address *
4919 VALLEY PIKE,
STEPHENS CITY, VA 22655

Emergency Response Phone *
234-234-2342

Extension

Contact Phone *
234-234-3242

Extension

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RCRA Info

Line Number	U.S. DOT Description
✓ 1	UN2035, 1,1,1-Trifluoroethane or Re
✓ 2	UN1457, Calcium peroxide, 5.1, II

Add Waste to Manifest

14. Special Handling Instructions and Additional Information

Special Handling Instructions for this Manifest

If this shipment contains residue or rejected waste from the previous shipment enter the Original Manifest Tracking Number

Handler Defined Data for this Manifest

Add Comment

Save Delete Back to Dashboard

Anything you can do on a computer, you can do on a phone

Update on e-Manifest User Fee Rule

- ▶ EPA issued proposed User Fee Rule on July 26, 2016
 - ▶ Proposed methodology for determining and revising user fees, and
 - ▶ Created process for publishing fee schedules to user community
- ▶ In response to proposal, we received 25 sets of public comments.
- ▶ First draft of final rule now under review with the workgroup
- ▶ Expect to issue final rule in December 2017

Key Regulatory Issues for Final User Fee Rule

1. Which manifest or data users will be charged fees?
2. Which transactions will be charged fees?
3. Should there be a Homeland Security based restriction on data disclosure?
4. Should the final rule determine if/when the fee formula pivots to more aggressive fees for paper manifest use?
5. What payment methods will be allowed?
6. What sanctions will be imposed for non-payment?
7. What process for resolution of fee disputes?
8. What should be the process for manifest data corrections?
9. What role is there for a “hybrid” or mixed paper and electronic manifest?
10. Should we prohibit facilities from submitting paper forms?

User Fee Rule Highlights

- ▶ Durable Fee Methodology with Differential Fee Formula:
 - ▶ “Durable” meaning we reuse the formula to periodically refresh the fees and we don’t issue new regulation with every refresh
 - ▶ “Differential fee” meaning the formula keys on the marginal labor cost of processing each manifest type (electronic vs. paper) and assigns higher fees to paper manifest types
- ▶ Two-year refresh cycle for user fee schedules
 - ▶ Formula allocates program costs across all manifests in use
 - ▶ Formula to be re-run at two-year intervals with latest program cost and manifest usage numbers to determine new fee schedules
 - ▶ Adjusters built in to correct for inflation and imprecise manifest estimates
 - ▶ Fee Formula may pivot to become more aggressive for paper manifests if we do not see 75% electronic usage after four years

Highlights (continued)

- ▶ Simplicity of fee collections is paramount:
 - ▶ Submission of final, signed manifest by receiving facility is the primary billable event in the system
 - ▶ No additional fees for continuation sheets, corrections to data, or for use of help desk
 - ▶ No collection of fees from generators or transporters
 - ▶ Export manifests not currently included in scope
- ▶ User fee rule provisions closely tied to phased implementation
 - ▶ Initial focus on TSDF participation and support for data uploads (XML) from paper manifests
 - ▶ Second phase aimed at outreach to generators
 - ▶ Initial support for “hybrid” or mixed paper/electronic manifests to aid generator’s participation in e-Manifest
 - ▶ Considering phase-out of mailed manifest submissions to EPA
 - ▶ Considering eventual phase-out of most paper manifest usage

e-Manifest Advisory Board

- ▶ The Hazardous Waste Electronic Manifest Establishment Act, mandated the establishment of e-Manifest System Advisory Board.
- ▶ e-Manifest System Advisory Board is a federal advisory committee whose role is to provide independent review and advice to the Agency on operational activities and functional matters.
- ▶ The Agency plans to publicly convene the Board approximately biannually.

Update on e-Manifest Advisory Board

- ▶ In January 2017, EPA held its first public meeting of the Hazardous Waste Electronic Manifest System (e-Manifest) Advisory Board.
- ▶ Official meeting minutes from the January Board meeting are available public docket at www.regulations.gov under DOCKET NUMBER: EPA-HQ-OLEM-2016-0695.
- ▶ The Advisory Board met to address critical policy and system development issues needing resolution prior to system launch.
- ▶ One key Advisory Board recommendation was that the Agency should work closely with the states and regions in advance of deployment to prepare the user community (especially generators).
- ▶ In response to the Board's recommendations, we have developed an e-Manifest Engagement Plan.
- ▶ Next Advisory Board meeting is scheduled for September 26-28, 2017 in Arlington, VA.

Board Member	Organization	Sector
Joshua Burman	Minnesota Pollution Control Agency	State Government
Michael M. Hurley	Massachusetts Department of Environmental Protection	State Government
John Ridgway	Washington State Department of Ecology	State Government
Thomas Baker	Veolia North America, Industrial Business	Business and Industry
Cynthia Walczak	MPS Group	Business and Industry
Justin Wilson	Wal-Mart Stores Inc.	Business and Industry
Raj Paul	Lochbridge	Expert in Business and Information Technology
Robert Klopp	Social Security Administration	Expert in Business and Information Technology

e-Manifest Engagement Plan

- ▶ Regularly engage and gather feedback from states, industry, and other related stakeholders regarding the development, implementation, and functioning of the e-Manifest system in order to ensure the system's viability, effectiveness, and user satisfaction.
- ▶ Ensure that the user community is aware of the economic benefits of adopting e-Manifest.
- ▶ Ensure that users of the system, including industry and states, are prepared to transition to and adopt the e-Manifest system.
- ▶ Foster partnerships to enable the states and regions to assist with stakeholder outreach.

Table 1. e-Manifest Engagement Activities by Target Audience

Engagement/ Communication Activity	Target Audience						
	General Public	EPA Regions and States	Hazardous waste generators	TSDFs	Hazardous waste transporters	Hazardous waste brokers and third party service providers	OMB, Congress, and DOT
FR notices		*	*	*	*	*	*
e-Manifest Marketing Initiative via videos and focus groups			*	*	*	*	
EPA e-Manifest Website	*	*	*	*	*	*	*
Regional and state meetings		*					
GitHub		*		*		*	
2 Week e-Manifest Sprint Deliveries				*			
Press Releases	*						
The e-Manifest Listservs and e-Manifest email account		*	*	*	*	*	*
Desk Statements	*						
Industry meetings/conferences			*	*	*	*	
e-Manifest email account eManifest@epa.gov		*	*	*	*	*	*
Public e-Manifest Advisory Board Meetings	*	*	*	*	*	*	*
Webinars	*	*	*	*	*	*	*
e-Manifest Fact Sheets/Checklists		*	*	*	*	*	*



Key Impacts on States/Regions

- ▶ User Registration
- ▶ Manifest Access
 - ▶ Electronic Manifests
 - ▶ Paper Manifests
 - ▶ Corrected Manifests
- ▶ State-specific Waste Codes
- ▶ Non-Hazardous Wastes
- ▶ Unknown Handler IDs (Emergency, Temporary, and New)
- ▶ State Fee Collections
- ▶ State/Region Data Sharing MOUs

Role of Regions & States

- ▶ e-Manifest will offer new opportunities:
 - ▶ 1st time collection of complete manifest data for all of nation,
 - ▶ 1st time opportunity for remote inspection of manifests for compliance,
 - ▶ System will soon become tool for biennial reporting of waste receipts.
- ▶ Regions and states will have to take action to prepare for e-Manifest:
 - ▶ All manifests will go to EPA; states will no longer receive manifests
 - ▶ States need to adopt One Year Rule if they wish to enforce e-Manifest and user fee rule provisions for consistency with EPA
 - ▶ States with existing manifest tracking programs need to prepare their systems to receive data directly from e-Manifest
- ▶ Regions and states can assist in transition by training agency and state personnel in use of system.
 - ▶ Discuss and monitor progress
 - ▶ Prioritize state adoption and authorization for e-Manifest



Impacts: User Registration

▶ Current Solution

- ▶ State/Regions will use the RCRAInfo system to view and manage user accounts associated with their State/Region
- ▶ Only users registered in the CDX-based Network Authentication and Authorization System (NAAS) with access to e-Manifest will be allowed access to the e-Manifest application and data submission/retrieval Advanced Programmer Interfaces (APIs)

▶ Requirements imposed on States/Regions

- ▶ States/Regions will need to register users to use e-Manifest with the CDX NAAS
- ▶ States/Regions will need to maintain user accounts over time, including ensuring that lists of users associated with their State/Region are correct and old accounts are deactivated



Impacts: Manifest Access - Electronic Manifests

▶ Current Solution

- ▶ State/Regional systems can access (and make corrections to) electronic manifest via the web application or API
- ▶ Data retrieved by these services can be filtered by various criteria
 - ▶ Specific manifest number - to retrieve specific manifests
 - ▶ Date ranges - to retrieve manifests submitted within a specific timeframe
 - ▶ Handler IDs - to retrieve manifests specific to a given generator, transporter, or handler
 - ▶ Other filters may be added in the future based on feedback from states

▶ Requirements imposed on States/Regions

- ▶ If states want to copy, update, or manipulate data within their own systems, they will be required to develop new or update existing systems to pull manifest data from the e-Manifest system based on their local requirements
- ▶ States are responsible for any state processing of manifest data. The EPA is simply a collector and distributor of raw manifest data as it was reported by the handlers



Impacts: Manifest Access - Paper Manifests

▶ Current Solution

- ▶ All paper manifests received by EPA will be scanned to create an electronic image of the paper received
- ▶ The paper processing center will extract the data from paper manifests and enter it into the e-Manifest system
- ▶ States/Regions can obtain (and correct) paper manifest data via the web application or API
- ▶ States/Regions can download the scanned image files of the paper received
- ▶ Image retrieval will be handled on a manifest-by-manifest basis

▶ Requirements imposed on States/Regions

- ▶ If states want to simply view images on the web, they can use the e-Manifest Web System to do so
- ▶ States would need to include specific functions within their systems to pull manifest paper images



Impacts: Manifest Access – Corrections

▶ Current Solution

- ▶ As corrections to existing manifests are received, they will be processed as new versions of an existing manifest
- ▶ States/Regions can obtain corrected manifest data using web application or APIs
- ▶ When requesting manifests, they can filter on only manifests with a new version(s) available
- ▶ Corrected paper submissions will follow the same processes previously described
- ▶ There is no time limit for correcting manifest data

▶ Requirements imposed on States/Regions

- ▶ States/Regions using APIs will need to include specific functions within their systems to collate corrected manifest data



Impacts: State Specific Hazardous Waste Codes

▶ Current Solution

- ▶ RCRAInfo is being updated to include a Web-based User Interface that allows authorized state users to create a list of state specific waste codes for their state
- ▶ State specific waste codes will include valid date ranges during which the waste code is allowed to be used on manifests
- ▶ As manifests are submitted, waste codes that do not match a Federal Hazardous Waste Code will be checked against appropriate state specific waste codes for that date

▶ Requirements imposed on States/Regions

- ▶ States will be required to regularly manage and maintain their state specific waste code lists in RCRAInfo



Impacts: Non-Hazardous Wastes

▶ Current Solution

- ▶ e-Manifest will allow for the listing of non-hazardous wastes on paper and electronic manifests
- ▶ e-Manifest will store the information, but will not validate the data beyond basic validation to ensure the data is submitted in a proper format
- ▶ States/Regions will receive non-hazardous waste data along with other manifest data

▶ Requirements imposed on States/Regions

- ▶ State/Regional systems will need to be able to receive the non-hazardous waste data as part of the manifest data
- ▶ State/Regional systems will be responsible for all validation and processing of non-hazardous waste data
- ▶ States/Regions will need to work directly with handlers to obtain corrections to non-hazardous waste data on manifests



Impacts: Unknown Handler IDs

▶ Current Solution

- ▶ e-Manifest will include features to support searching for Handler ID information based on other Handler data (name, address, other business information)
- ▶ The system will not prevent the entry of an unknown Handler ID, but will:
 - ▶ Prompt the user for more information about the Handler
 - ▶ Make recommendations based on that information for partially matching known handlers
 - ▶ Request they verify the unknown Handler ID before submission
- ▶ If a user confirms that the unknown Handler ID and information are correct, the system will record the user entered information in the manifest and flag the entry for later follow-up by States and Regions

▶ Requirements imposed on States/Regions

- ▶ States/Regions will need to validate unknown Handler IDs against their data of Temporary, Emergency, and newly issued Handler IDs to ensure correctness
- ▶ As appropriate, States/Regions should enter these Handler IDs into RCRAInfo for future use



Impact: State Fee Collections

▶ Current Solution

- ▶ EPA will not be responsible for collection or tracking of any state fees
- ▶ States can impose their own fees once they retrieve manifest data/images from the e-Manifest system

▶ Requirements imposed on States/Regions

- ▶ State systems may need to be updated to use data retrieved from e-Manifest in levying state-specific fees



Impacts: States/Regions RCRA Memoranda of Agreement (MOAs)

▶ Current Solution

- ▶ States, Regions, and the EPA (as appropriate) will need to examine existing MOAs and determine what changes (if any) are required to accommodate the sharing of electronic manifest data
- ▶ Updated MOAs will need to be vetted and approved by the appropriate Region

▶ Requirements imposed on States/Regions

- ▶ States/Regions will need to examine existing MOAs and update as necessary
- ▶ States will need to work with Regions to have them approve any updated MOAs

Outreach and Next Steps

▶ Outreach

- ▶ Submit input/questions to eManifest@epa.gov
- ▶ To subscribe to the ListServ send a blank message to: eManifest-subscribe@lists.epa.gov
- ▶ Monthly demonstration webinars starting 4/26
- ▶ User Testing
 - ▶ To test visit: <https://test.epacdx.net>
 - ▶ In order to access the test environment, all users will be required to set up a test account on EPA's Central Data Exchange (CDX).
 - ▶ A detailed guide is available at <https://github.com/USEPA/e-manifest/tree/master/Reference>
- ▶ Advisory Board

▶ Next Steps

- ▶ Tell us what is missing
- ▶ Tell us what you need