e-Manifest

ASTSWMO

Joint Solid and Hazardous Waste Conference

August, 2017
Discussion Overview

• e-Manifest Overview
• Current Status
• What e-Manifest means for States and Regions
• State Checklists
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e-Manifest 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-Manifest Overview

• To economize implementation, e-Manifest will leverage features from other EPA systems, including
  – The Resource Conservation and Recovery Act Information System (RCRAInfo)
  – The Central Data Exchange (CDX)
  – Other EPA Electronic Enterprise (E-Enterprise) systems as appropriate
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.
Current Status - Implementation

- EPA has formed a workgroup of Regional contacts to assist with implementing e-Manifest.
- ORCR met with the EPA Regions in June to discuss the Implementation plan.
- EPA regional offices reached out to the states within their region in July
Current Status - System Development

• Release 1
  – Fall 2016 to June 2017 – Web application, user administration and services.

• Release 2
  – July 2017 to December 2017 – State interface, pay.gov integration,

• Beta Release
Current Status - Rulemaking

• EPA completed final agency review in June 2017
• EPA expects to forward the final rule to the Office of Management and Budget to begin EO 12866 interagency review later this summer.
• EPA is on track to finalize the user fee rule in December 2017.
Current Status – Advisory Board

• e-Manifest Advisory Board
  – First meeting in 1/2017
  – Next meeting 9/2017

• The meeting theme will be “Implementing e-Manifest: User Registration and Account Activation”

• For further information:
  – Refer to the July 14, 2017, Federal Register notice
  – Contact DFO Fred Jenkins at 703-308-7049 or by e-mail: jenkins.fred@epa.gov.
Current Status – Communications

• Monthly webinars on last Wednesday of each month.
  – Monthly updates sent out through e-Manifest ListServ.
• There are lots of ways to get involved and learn more
  – Submit input/questions to eManifest@epa.gov
  – To subscribe to the general interest e-Manifest ListServ send a blank message to: eManifest-subscribe@lists.epa.gov
  – To subscribe to the development-focused e-Manifest ListServ, send a blank email to: e-ManifestDev-subscribe@lists.epa.gov.
  – To track the progress of e-Manifest visit: https://github.com/USEPA/e-manifest
States and Regions

- 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.
States and Regions

• 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 & user fee final rule if they wish to enforce e-Manifest and for consistency with EPA
  – States with existing manifest tracking programs need to prepare their systems to receive data directly from e-Manifest
States and Regions

• 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
  – Upcoming opportunity at RCRAInfo conference

• e-Manifest Checklists – *prepared to assist you*
State Checklist - Technology

- **Issue:** State-specific waste codes, state-regulated facilities, and unassigned generators need to be recognized by e-Manifest

- **Solution:** States need to
  - Verify that state-specific waste codes are in RCRAInfo.
  - Identify unassigned generators and state-regulated facilities
State Checklist - Technology

• Issue: Temporary and emergency Handler IDs need to be captured in e-Manifest

• Solution: States need to
  – Ensure the temporary and emergency Handler IDs currently captured in state-owned systems are reflected in e-Manifest/myRCRAid.
State Checklist - Policy

• Issue: When e-Manifest goes live, the TSDF copy of the manifest will go to EPA

• Solution: States need to
  – Terminate state collection of paper manifests from TSDFs by Day 1 of system launch (June 2018).
  – Make decision regarding whether to continue collecting paper manifests from generators.
State Checklist - Policy

• Issue: e-Manifest will create the need to change State systems and activities

• Solution: States need to
  – Update state websites related to hazardous waste manifests
  – Create user registrations for state regulatory, enforcement, and emergency response staff to access e-Manifest.
  – Work to connect state manifest databases to receive data from e-Manifest.
Impact: Manifest Access

• **Planned Solution**
  – State/Regional systems can access electronic manifests via the web application or API

• **States/Regions**
  – States will need to develop new or update existing systems to pull manifest data from the e-Manifest system
  – States are responsible for any additional processing of manifest data.
  – The EPA is simply a collector and distributor of raw manifest data as it was reported by the handlers
Impact: Paper Manifests

• Planned Solution
  – All paper manifests received by EPA will be scanned to create an electronic image of the paper received
  – The paper processing center will capture the data from paper manifests and enter it into the e-Manifest system
  – States/Regions can download the scanned images

• States/Regions
  – Manifests can be viewed using the web application
  – To retrieve manifest images, States would need to include specific functions within their systems
Impact: Corrections

• **Planned Solution**
  – As corrections to existing manifests are received, they will be processed as new versions of an existing manifest
  – When requesting manifests, you can filter on manifests with a new version(s)
  – Corrected paper submissions will follow the same paper process
  – There is no time limit for correcting manifest data

• **States/Regions**
  – States/Regions using APIs will need to include specific functions within their systems to collate corrected manifest data
Impact: State Specific Waste Codes

• Current Solution
  – RCRAInfo is being updated to include a list of state specific waste codes
  – 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 will be checked against appropriate state specific waste codes for that date

• States/Regions
  – States will need to regularly manage and maintain their state specific waste code lists in RCRAInfo
Impact: Non-Hazardous Wastes

• Planned Solution
  – e-Manifest will allow listing non-hazardous wastes on paper and electronic manifests
  – e-Manifest will store the information, but will not validate the data beyond basic validation
  – States/Regions will receive non-hazardous waste data along with other manifest data

• States/Regions
  – State/Regional systems will need to be able to receive the non-hazardous waste data as part of the manifest data
Stay Informed

• New e-Manifest implementation workgroup started
  – Meeting monthly
  – May include State POC’s in some future calls
• New e-Manifest/RCRAInfo sub-lead region topic created
  – R9 new sub-lead; topics to be discussed on RCRA Base Program Calls
• Updated e-Manifest website
Stay Informed

• Monthly e-Manifest demonstration webinars
  – Last Wednesday of each Month at 2 pm EST

• User Testing has begun
  – Need more users to sign up

• Advisory Board
  – New public meeting September 26-28, 2017 in Potomac Yard to focus on user registration and account maintenance.

• ListServ to receive monthly updates
Key Takeaways

• e-Manifest will launch in June 2018;
• e-Manifest will take effect everywhere at the same time
• e-Manifest is for all destination facilities
  – including state-only hazardous waste facilities
  – must submit those manifests to EPA either in paper or electronically and pay an associated fee.
Key Takeaways

• Once e-Manifest is effective
  – States will have access to data from e-Manifest.

• Electronic Submission
  – Facilities will be required to register for e-Manifest.
  – Decisions on final user registration process coming fall 2017
Questions?