

**FINAL AGENDA**  
**U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)**  
**e-MANIFEST ADVISORY BOARD MEETING**  
**PUBLIC MEETING**  
**JUNE 18-20, 2019**  
**DOCKET NUMBER: EPA-HQ-OLEM-2019-0194**  
**LOCATION: THE ENVIRONMENTAL PROTECTION AGENCY**  
**CONFERENCE CENTER, LOBBY LEVEL, ONE POTOMAC YARD (SOUTH**  
**BLDG.), 2777 S. CRYSTAL DR., ARLINGTON, VA 22202**

**e-Manifest Advisory Board to Address – “Increasing Adoption of the e-Manifest System.” Please note that all times are approximate (see note at end of Agenda).**

<p><b>Day 1</b> <b>Tuesday, June 18, 2019</b></p>
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**9:00 A.M. Opening of Meeting and Administrative Procedures** – Fred Jenkins, Ph.D., Designated Federal Officer (DFO) for the e-Manifest Advisory Board

**9:05 A.M. Introduction and Identification of Board Members** – Barnes Johnson, Director, Office of Resource Conservation and Recovery, and Delegated Chair of the e-Manifest Advisory Board

**9:10 A.M. Welcome and Opening Remarks** – Nigel Simon, Acting Principal Deputy Assistant Administrator, Office of Land and Emergency Management

**9:20 A.M. Introduction and Purpose of Meeting** – Stephen Donnelly, e-Manifest Program Manager

**9:35 A.M. e-Manifest Background** – Stephen Donnelly, e-Manifest Program Manager

**9:50 A.M. e-Manifest Program Update** – Stephen Donnelly, e-Manifest Program Manager; and Amanda Kohler, Chief, Permits Branch

**10:30 A.M. Update on e-Manifest User Fees for FY2020/2021** – Richard Canino, e-Manifest Financial Lead; and Stephen Donnelly, e-Manifest Program Manager

**10:50 A.M. Problem Statement** – Mimi Guernica, Associate Director, Program Implementation and Information Division

**11:00 A.M. CROMERR Overview** – Shirley Miller, Cross-Media Electronic Reporting Rule (CROMERR) Program Manager, Office of Mission Support (OMS)

**11:10 A.M. Break**

**11:20 A.M. e-Manifest Signature Requirements** – Stephen Donnelly, e-Manifest Program Manager; Michael LeDesma, Attorney, Office of Enforcement and Compliance Assurance (OECA); and Greg Mitchell, CROMERR Service Manager, OMS

**12:00 P.M. Lunch**

**1:00 P.M. Challenges with Executing CROMERR-Compliant Signatures in e-Manifest** – Wendy Blake-Coleman, Chief, Information Exchange Services Branch; Scott Christian, e-Manifest Technical Lead; and Stephen Donnelly, e-Manifest Program Manager

**1:10 P.M. Clarifying Requirements** – Scott Christian, e-Manifest Technical Lead; Stephen Donnelly, e-Manifest Program Manager; Greg Mitchell, CROMERR Service Manager; and Michael LeDesma, Attorney

**1:45 P.M. User Registration** – Scott Christian, e-Manifest Technical Lead; Stephen Donnelly, e-Manifest Program Manager; Greg Mitchell, CROMERR Service Manager; and Michael LeDesma, Attorney

**2:15 P.M. 3rd Party Application and Biometrics** – Scott Christian, e-Manifest Technical Lead; Stephen Donnelly, e-Manifest Program Manager; Greg Mitchell, CROMERR Service Manager; and Michael LeDesma, Attorney

**3:00 P.M. Break**

**3:15 P.M. External System Authorization** – Scott Christian, e-Manifest Technical Lead; Stephen Donnelly, e-Manifest Program Manager; Greg Mitchell, CROMERR Service Manager; and Michael LeDesma, Attorney

**3:45 P.M. CROMERR Application Review Process** – Wendy Blake-Coleman, Chief, Information Exchange Services Branch; and Stephen Donnelly, e-Manifest Program Manager

**4:15 P.M. CROMERR Advocate Case Study** – John Dombrowski, Deputy Director, Office of Compliance; and Stephen Donnelly, e-Manifest Program Manager

**4:40 P.M. The Path Forward** – Stephen Donnelly, e-Manifest Program Manager

**5:00 P.M. Adjourn**

**Day 2**  
**Wednesday, June 19, 2019**

**9:00 A.M. Opening of Meeting and Administrative Procedures** – Fred Jenkins, Ph.D., Designated Federal Officer (DFO) for the e-Manifest Advisory Board

**9:05 A.M. Introduction and Identification of Panel Members** – Barnes Johnson, Director, Office of Resource Conservation and Recovery, and Delegated Chair of the e-Manifest Advisory Board

**9:10 A.M. Public Comments**

**11:00 A.M. Break**

**11:10 A.M. Charge to Board**

**Charge Area (1) Identifying “Pain Points” Preventing Wider Adoption of Electronic Manifests (Chapters 2, 3, 4, 5)**

*Charge Question 1a.* What are the main challenges **generators** face with using fully electronic manifests? EPA specifically requests information regarding the nature of the challenge, whether there’s a certain step in the process (e.g., user registration or electronic signature) that is causing friction, and whether there are actions EPA can take, such as training or engagement, to assist with these challenges.

**12:00 P.M. Lunch**

**1:00 P.M. Charge to Board (Cont’d)**

*Charge Question 1b.* What are the main challenges **transporters** face with using fully electronic manifests? EPA specifically requests information regarding the nature of the challenge, whether there’s a certain step in the process (e.g., user registration or electronic signature) that is causing friction, and whether there are actions EPA can take, such as training or engagement, to assist with these challenges.

*Charge Question 1c.* What are the main challenges **receiving facilities** face with using fully electronic manifests? EPA specifically requests information regarding the nature of the challenge, whether there’s a certain step in the process (e.g., user registration or electronic signature) that is causing friction, and whether there are actions EPA can take, such as training or engagement, to assist with these challenges.

**3:00 P.M. Break**

### **3:15 P.M. Charge to Board (Cont'd)**

#### **Charge Area (2) Modifying User Registration to Encourage Use of Electronic Manifesting (Chapter 6.1)**

*Charge Question 2a.* What is the feasibility and the likelihood of generators and transporters adopting the electronic manifest if they could, for example, in lieu of user registration:

- Handler creates an electronic manifest and sends a link to the generator or transporter;
- Generator/transporter opens the link to the manifest and adds their email address or personal cell phone number to the manifest;
- e-Manifest sends a unique code to the generator/transporter's email/phone;
- Generator/transporter then signs the document, using the adds the unique code as a one-time signature credential.

*Charge Question 2b.* Assuming that a phone number and/or email address are not, by themselves, sufficient proof of identity, what strategies short of biometry can be employed to link the delivered code to an individual of known or ascertainable identity?

*Charge Question 2c.* How best can EPA provide customer service to those entities that would utilize this solution (i.e., use of an email or text message notification to validate their signature) and steer them through this process?

*Charge Question 2d.* Are there any drawbacks or concerns related to a “no-user registration” process?

**5:00 PM Adjourn**

**Day 3**  
**Thursday, June 20, 2019**

**9:00 A.M. Opening of Meeting and Administrative Procedures** – Fred Jenkins, Ph.D., Designated Federal Officer (DFO) for the e-Manifest Advisory Board

**9:05 A.M. Introduction and Identification of Board Members** – Barnes Johnson, Director, Office of Resource Conservation and Recovery, and Delegated Chair of the e-Manifest Advisory Board

**9:10 A.M. Charge to Board (Cont'd)**

**Charge Area (3) Third-party Applications and Biometrics to Encourage Electronic Manifesting (Chapters 6.2 and 7)**

*Charge Question 3a.* Assuming a waste handler invests in a device by which to execute biometric signatures, what obstacles could a third-party application, particularly one that leverages biometrics, present to the user community? Are there things EPA can do to minimize integration/implementation hurdles?

*Charge Question 3b.* How best could EPA's e-Manifest program promote and support implementation of these solutions with industry and states?

*Charge Question 3c.* In terms of a recommended configuration for deploying a third-party application, we ask the Board members to please comment on the importance of each of its components, including:

- i. The form factor – e.g., cell phone, tablet, or laptop PC – for the portable device on which electronic manifests will be displayed and presented to users.
- ii. Discuss advantages and drawbacks of each of the aforementioned form factors, considering the following factors:
  - A. Display area required to show manifest data to users comfortably, clearly, and in a human readable format as required by Cross Media Electronic Reporting Rule (CROMERR);
  - B. Cost of deploying devices in the field;
  - C. Durability of the device over time and in the settings (e.g., outdoors) where it will be used;
  - D. Availability of a reliable power source for the device while in the field;
  - E. Need for access to a network connection at the time of signature;
  - F. Suitability for connecting to appropriate peripherals, e.g., signature pads, printers, power supplies; and
  - G. Ease of use in entering, displaying, and correcting data.

## **10:45 A.M. Break**

*Charge Question 3d.* What are the primary factors governing whether or not the service industries are willing to make investments in such devices? Are there particular device/system features that would decisively foreclose adoption?

*Charge Question 3e.* Is the stakeholder community widely aware that EPA has evaluated and approved an approach that relies on digitized signatures and which would, thereby, work offline and without prior registration? If so, are there features of this approach that make it unattractive?

## **12:00 P.M. Lunch**

## **1:00 P.M. Charge to Board (Cont'd)**

*Charge Question 3f.* Is a biometric signature tool that requires network connection at the time of signature worth pursuing, or its biometry worth pursuing only if it can eliminate the need for a network connection at the time of signature?

*Charge Question 3g.* How useful would it be for EPA to provision a web-based signature tool (that also works on a smartphone) that, for any user already registered to the e-Manifest system, can be called without login from anywhere that has a network connection (such as an industry-owned system or smartphone application) to present all documents awaiting signature by that user

## **3:00 P.M. Break Charge to Board Cont'd)**

*Charge Question 3h.* Should EPA, in consultation with the Advisory Board, select one technology for use in e-Manifest or should we allow multiple technologies to be used provided they are subject to the same performance standards?

## **Charge Area (4) Other Options for Encouraging Electronic Manifesting**

*Charge Question 4a.* Are there other options that EPA should explore, such as regulatory or policy changes, that would facilitate greater use of electronic?

## **4:30 P.M. Closing Remarks –**

Barnes Johnson, Director, Office of Resource Conservation and Recovery, and Delegated Chair of the e-Manifest Advisory Board; and Fred Jenkins, Ph.D., Designated Federal Officer for the e-Manifest Advisory Board

## **5:00 P.M. Adjourn**

Please be advised that agenda times are approximate; when the discussion for one topic is completed, discussions for the next topic will begin. For further information, please contact the Designated Federal Officer for this meeting, Dr. Fred Jenkins, via telephone: (703)308-7049 or email: jenkins.fred@epa.gov.