



E-MANIFEST

MONTHLY WEBINAR SERIES

JANUARY 29, 2020



AGENDA

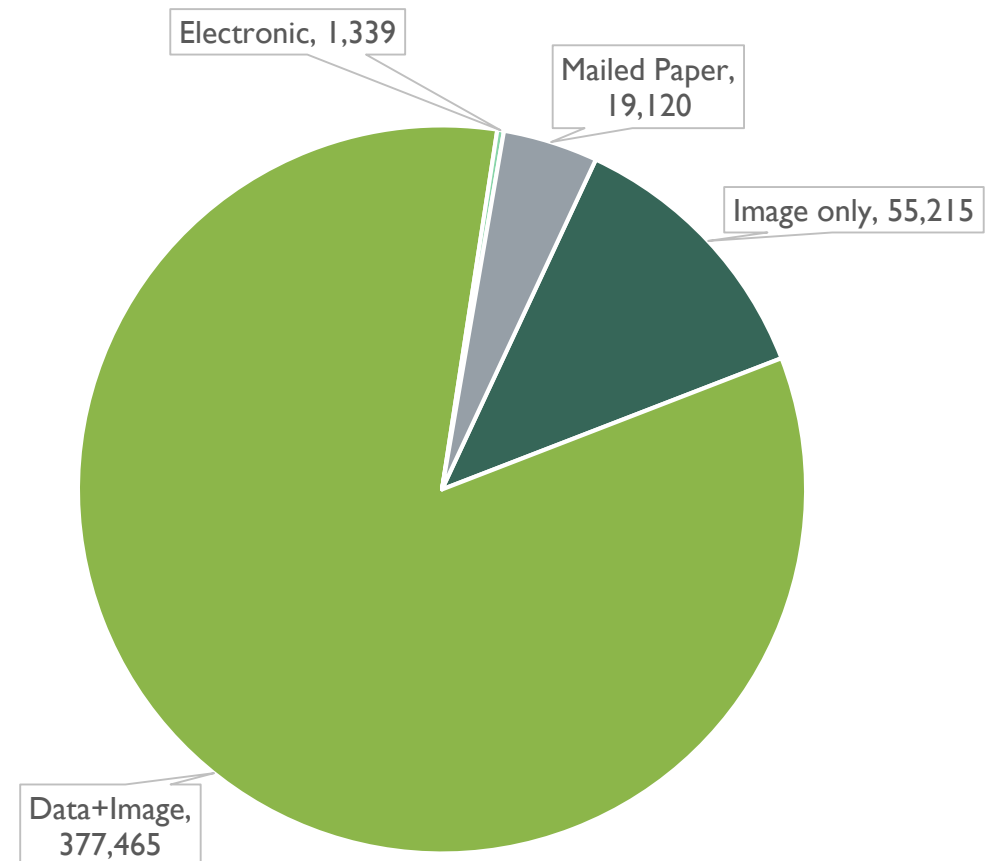
e-Manifest

- Activity Summary
- System Functionality Update
- PHARMS/PHRM Code Memo
- PCB Manifest FAQs
- Inconsistencies between scanned image and data
- Manifest tracking number validation
- Paper Processing Center address change
- Questions from audience

FY 2020 ACTIVITY SUMMARY

e-Manifest

- Total manifests: 453,139
 - FY 2019 Comparison: 509,145
- Paper Backlog
 - Total processed: 152k
 - Remaining: ~15k
- Image Backlog
 - Total processed: 340k
 - Remaining: 114k



SYSTEM FUNCTIONALITY UPDATE

e-Manifest

- Two recent production releases – January 4 and January 24
 - e-Manifest UI: Fixed Errors related to changing Manifest type and rejection information on an unsaved manifest
 - State corrections: Fixed view page display of Federal Waste Codes on signed and corrected manifests and waste line information display issues.
 - Copy of Record page resolved several display issues
 - Fixed the following services issues with data saving:
 - Company Name is now saving if submitted with contact information
 - Cleaned up unneeded additional fields being saved in “Ready for Signature” that are populated with Signed or Corrected
 - Relaxation of BR Info section via Services to allow for partial information to be submitted (like Density information)
 - Adding Potential Shipped Date to the form (Optional field to help users identify which manifest they need to sign)
 - Updated Is Transporter logic to improve performance
- Check out <https://github.com/USEPA/e-manifest> for more info!

SYSTEM FUNCTIONALITY UPDATES

e-Manifest

- The following will be available in production on December 6, 2019:
 - State corrections
 - Back end broker services
 - Weekly summary emails
 - Bulk Sign Filters for Generators, Transporters and manifests under correction
 - Generators and Transporters can correct transporters
 - BR Information can be entered partially, meaning a site can just send density information and not form or source code information in the BR section.
 - Show if a site has a user in the user interface (services will be added later)
 - Fixed issue with country being required on certain manifests
 - Changed Searches to include same day searches - start and end dates can be the same date.

SHIPPING HAZARDOUS WASTE PHARMACEUTICALS - PHARMS/PHRM CODE MEMO

e-Manifest

- Healthcare facilities (e.g., hospitals, retail pharmacies, etc.) must ship non-creditable hazardous waste pharmaceuticals directly to a TSDF for disposal.
 - Must use the manifest and a hazardous waste transporter.
 - Non-creditable HW pharmaceuticals have no reasonable expectation of receiving credit from a manufacturer (e.g., broken, floor sweepings, dispensed to a patient).
- §266.508(a)(2)(ii) requires healthcare facilities to write “PHARMS” in item 13 of the manifest.
- Makes it easier for healthcare facilities and healthcare professionals (e.g., doctors, nurses) to properly characterize and manage their HW pharmaceuticals.
- EPA originally proposed a requirement to write “hazardous waste pharmaceuticals” in Item 14.
 - Turns out e-Manifest requires at least one code in Item 13
 - Went with PHARMS because the system can accept six-character codes and it sounds like what it is.

SHIPPING HAZARDOUS WASTE PHARMACEUTICALS - PHARMS/PHRM CODE MEMO

e-Manifest

- Six characters is a problem for generators that still use the paper manifest.
- Six characters is also a problem for both generators and states whose data systems only allow for the use of four-character codes.
- To ease implementation challenges, EPA and states agreed to allow the use of a four-character code: PHRM – **both PHARMS and PHRM are acceptable.**
- EPA issued a memo on 12.19.2019 ([RO14919](#)) making it official agency policy to allow both codes on the manifest.
 - The memo requests that implementing states/regions encourage healthcare facilities to use for the four-character PHRM code.
 - The memo also clarifies that additional waste codes are allowed on the manifest, but they are not required.
- We may consider issuing a technical corrections rule to either replace PHARMS with PHRM, or codify the use of both codes.

NEW FREQUENTLY ASKED QUESTIONS ABOUT PCBs

e-Manifest

- **Does waste containing TSCA-regulated PCBs need to be manifested for disposal? [Scope #12]**

Yes. Unless specifically exempted from the requirements in [40 CFR part 761 subpart K](#). The PCB regulations require generators to prepare a manifest on [EPA Form 8700-22](#), and, if necessary, a continuation sheet prior to transporting regulated PCB waste. Regulated PCB waste(s) means those PCBs and PCB Items that are subject to the disposal requirements of [40 CFR part 761 subpart D](#). See [40 CFR 761.207](#) for more information.

- **Is a manifest necessary for PCB waste that is not regulated under federal TSCA regulations, but which is regulated by the state? [Scope #13]**

Yes. Waste containing PCBs that is not regulated for disposal under TSCA federal regulation (e.g., transformers containing < 50 ppm PCBs) may still be regulated by state waste programs. If the PCB-containing waste is regulated by the state where the waste is generated or the state where the waste is received, use [EPA Form 8700-22](#), leave Box B blank and complete Box C.

- **If a waste contains non-TSCA regulated PCBs, does this need to be stated on the manifest? [Scope #14]**

Yes. If the waste contains PCBs but is not TSCA-regulated waste, it needs to be clearly stated on the manifest, e.g. “Non-TSCA PCB waste.” Using the phrase “Non-DOT Regulated Polychlorinated Biphenyls” is not sufficient to communicate that a waste is not TSCA-regulated.

NEW FREQUENTLY ASKED QUESTIONS ABOUT PCBs

e-Manifest

- **What information about PCB waste is required to be included on the manifest? [Generators #17]**

Generators who transport, or offer for transport TSCA-regulated PCB waste must include all of the required information on either the manifest ([Form 8700-22](#)) or the manifest continuation sheet ([Form 8700-22A](#) or other PCB manifest continuation sheet).

The following information is required under 40 CFR 761.207(a) for each PCB waste category at the specified frequency.

	Required Frequency	Identity/type of PCB waste	Date of removal from service	Weight in kilograms	Unique identifying number
Bulk PCB waste	Per load	X	X	X	
PCB Article Container	Per container	X	X	X	X
PCB Container	Per container	X	X	X	X
PCB Article not in a PCB Container or PCB Article Container	Per article		X	X	X

NEW FREQUENTLY ASKED QUESTIONS ABOUT PCBs

e-Manifest

- **Is a Unique Identifier required for every container listed on the manifest? [Generators #18]**

Yes. A unique identifier is required for each PCB container shipped on a manifest. See the table above for the required frequency and information for each waste type. These requirements can be found at 40 CFR 761.207(a):

“...The generator shall specify: ...For each PCB Article Container or PCB Container, the unique identifying number, type of PCB waste (e.g., soil, debris, small capacitors), earliest date of removal from service for disposal and weight in kilograms of the PCB waste contained. (Item 14—Special Handling Instructions box)”

- **Can I use the manifest tracking number as the Unique Identifier? [Generators #19]**

Yes. The generator can choose to assign the manifest tracking number as the unique identifier for a single PCB article or container. For manifests shipping multiple PCB articles and/or containers, the generator can choose to assign Unique Identifiers that include the manifest tracking number, if each item has a **unique** identifier (e.g., 1234567MTN-01, 1234567MTN-02, 1234567MTN-03).

NEW FREQUENTLY ASKED QUESTIONS ABOUT PCBs

e-Manifest

- **Do record retention policies differ for RCRA and PCB wastes tracked with the RCRA manifest? [Record Retention and Distribution #4]**

No. Record requirements for both RCRA hazardous waste and Regulated PCB waste manifests are the same; both must be kept for three years under EPA's federal regulations.

- **What PCB manifest information is required to be submitted to EPA's e-Manifest system? If a continuation sheet is used, must it be submitted to EPA's e-Manifest system? [Receiving Facilities #9]**

Facilities receiving PCB waste that is required under either federal or state law to be shipped on a manifest must submit the manifest [Form 8700-22](#), and all required manifest information to EPA's e-Manifest system. If a continuation sheet is used with the manifest, it must be submitted to EPA's e-Manifest system. Generators may use [Form 8700-22A](#) or other PCB manifest continuation sheet in accordance with Note 1 to 40 CFR 761.207(a):

"EPA Form 8700– 22A is not required as the PCB manifest continuation sheet. In practice, form 8700–22A does not have adequate space to list required PCB-specific information for several PCB articles. However, if form 8700–22A fits the needs of the user community, the form is permissible."

NEW FREQUENTLY ASKED QUESTIONS ABOUT PCBs

e-Manifest

- **If a manifest lists waste containing “< 50 ppm PCBs” or “trace PCBs,” will it be considered a TSCA-regulated PCB waste that requires submittal of all of the supporting information? [Receiving Facilities #16]**

Yes. EPA will consider all wastes described as containing PCBs on a manifest to be TSCA-regulated PCB waste and will therefore need the required supporting information. EPA must make this assumption as waste containing < 50 ppm PCBs is often TSCA-regulated, for example, if it is < 50 ppm as a result of dilution. See 40 CFR 761.60(g) for an example.

If the PCB-containing waste is not required to be manifested under either federal or state law (and thus use of the manifest is voluntary), receiving facilities do not need to submit the manifest to EPA. In the event that a manifest is not required by the PCB regulations but is required by other state or federal requirements, the manifest should say, “Non-TSCA PCBs.” This clarification will avoid the receiving facility having to submit any other information about the PCB waste.

- **[Receiving Facilities #17] Is it necessary to manifest waste that may or may not be TSCA regulated? I am sending it to the TSDF where they will determine the concentration and regulatory status for me.**

Yes. If the regulatory status of the waste has not been determined, you must comply with all of the requirements in 40 CFR part 761 subpart D, including use of a hazardous waste manifest, until such time as the regulatory status is determined.

INCONSISTENCIES BETWEEN SCANNED IMAGE AND DATA

e-Manifest

- Since June 30, 2018, EPA has seen over 2m data + image manifests and there are some common inconsistencies
 - Generator ID uploaded doesn't match Generator on manifest
 - Transporter ID doesn't match Transporter on the manifest
 - Printed type name, emergency ID numbers, phone numbers missing/inconsistent
 - Manifest tracking numbers

MANIFEST TRACKING NUMBER VALIDATION

e-Manifest

- Mis-keying the tracking number is an issue for all types of paper manifest uploads
- To remedy, EPA is utilizing Optical Character Recognition (OCR) to check the manifest tracking number on the printed form with the number entered by the user
 - Scheduled for the user interface on March 20
 - Tentatively scheduled for services in May
- Workflow
 - User uploads manifest scan and enters number
 - E-Manifest scans PDF and extracts number, compares to number entered by user
 - If there is no issues, manifest upload is complete
 - If the user enters the wrong number they get an error message and then can answer a question as to whom is correct
 - If they select yes the error goes away
 - If they select no they need to correct the error to save the manifest

MANIFEST TRACKING NUMBER VALIDATION

e-Manifest

■ Successful upload

✓ Manifest has been saved and marked ready for signature.


DRAFT

PENDING

SCHEDULED


IN TRANSIT

For assistance completing this form, please review the [application help](#) and [manifest methods](#).

General Information

Manifest Tracking Number *

001838005VES

Manifest Type

- Paper + Data - uploading manifest scanned image and all associated data
- Paper only - uploading manifest scanned image only

Origin Type

Web

Select a status for this manifest *

- Ready For Signature - Received by Designated Facility and ready to be signed

MANIFEST TRACKING NUMBER VALIDATION

e-Manifest

- Numbers do not match

RCRA Info Home Tools Billing 4 Documentation Feedback/Report an Issue scot

DRAFT PENDING SCHEDULED IN TRANSIT RECEIVED

For assistance completing this form, please review the [application help](#) and [manifest methods](#).

General Information

Manifest Tracking Number *	Manifest Type	Origin Type
<input type="text" value="899997599JJK"/> PDF Extraction Failed; unable to verify Tracking Number match	<input checked="" type="radio"/> Paper + Data - uploading manifest scanned image and all associated data <input type="radio"/> Paper only - uploading manifest scanned image only	Web

Above Manifest Tracking Number and PDF Tracking Number are identical? *

Yes No

This field is required.

Select a status for this manifest *

Ready For Signature - Received by Designated Facility and ready to be signed

Does this manifest contain rejected waste or residues from a previous manifest?

MANIFEST TRACKING NUMBER VALIDATION

e-Manifest

- User confirms

The screenshot displays the RCRA Info e-Manifest application interface. At the top, a navigation bar includes the RCRA Info logo, a 'Home' link, and menu items for 'Tools', 'Billing' (with a notification badge of 4), 'Documentation', and 'Feedback/Report an Issue'. A user profile for 'scott' is visible in the top right. Below the navigation bar is a progress indicator with five stages: DRAFT (star icon), PENDING (calendar icon), SCHEDULED (calendar with checkmark icon), IN TRANSIT (truck icon), and RECEIVED (star icon). A yellow banner below the progress indicator provides assistance: 'For assistance completing this form, please review the [application help](#) and [manifest methods](#).' The main form area is titled 'General Information' and contains the following fields:

- Manifest Tracking Number ***: A text input field containing '899997599JJK'.
- Manifest Type**: Radio button options for 'Paper + Data - uploading manifest scanned image and all associated data' (selected) and 'Paper only - uploading manifest scanned image only'.
- Origin Type**: A dropdown menu with 'Web' selected.
- Above Manifest Tracking Number and PDF Tracking Number are identical? ***: Radio button options for 'Yes' (selected) and 'No'.
- Select a status for this manifest ***: Radio button options for 'Ready For Signature - Received by Designated Facility and ready to be signed' (selected).

PAPER PROCESSING CENTER ADDRESS CHANGE

e-Manifest

EPA e-Manifest PPC
14200 Park Meadow Drive
Ste. 200-S
Chantilly, Virginia 20151

LIVE Q AND A

e-Manifest



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- Help desk: (833) 501-6826
- Participate in our monthly webinars
- To subscribe to the general program Listserv. Send a blank message to: eManifest-subscribe@lists.epa.gov
- To subscribe to the developers only Listserv send a blank message to: e-manifestdev-subscribe@lists.epa.gov
- Visit the program web site: <http://www.epa.gov/e-manifest>