



# *E-MANIFEST*

MONTHLY WEBINAR SERIES

JUNE 24, 2020



# AGENDA

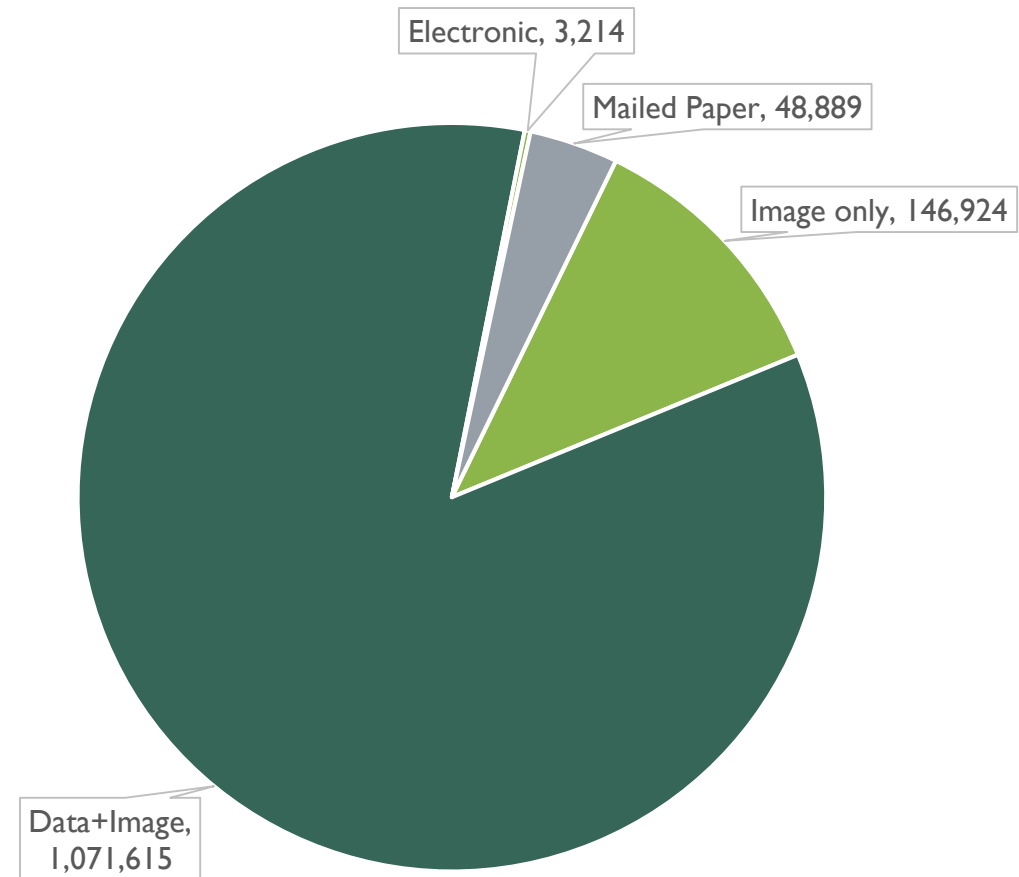
## *e-Manifest*

- System Statistics Update
- PHARMS FAQs
- Responding to May 2020 Webinar FAQs
- e-Manifest Advisory Board Update/Reminder
- Demonstration of Industry Reporting Function
- Demonstration of Optical Character Recognition

# FY 2020 ACTIVITY SUMMARY

# e-Manifest

- Current pace: ~2M/year
- Paper processing backlog burndown in progress
  - Total processed: 700k
  - Remaining: 35k
- Submission breakdown:
  - Data+Image: 84%
  - Image: 12%
  - Mail: 4%
  - Electronic: .25%



Manifests FY 2020 Oct 1 – May 31

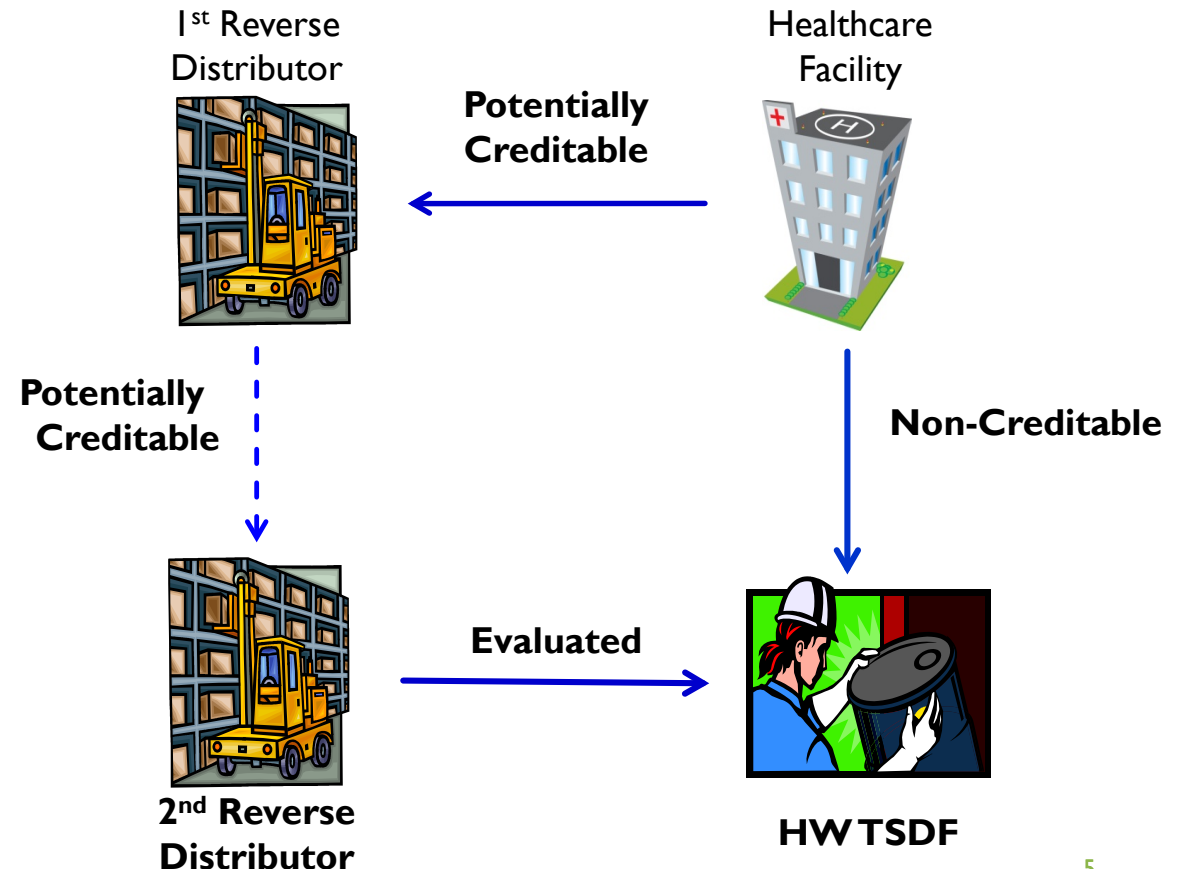


# NEW MANAGEMENT STANDARDS FOR HAZARDOUS WASTE PHARMACEUTICALS (“PHARMS” RULE) FAQs

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### Background about the Pharmaceuticals Rule

- Applies to all HW pharmaceuticals generated by healthcare facilities (two-pronged approach).
- Healthcare facility is anyone that sells or distributes pharmaceuticals. Includes retailers, hospitals, long-term care facilities and veterinary offices.
- Two types of HW pharmaceuticals generated at a healthcare facility: potentially creditable HW pharmaceuticals and non-creditable HW pharmaceuticals
- Only non-creditable HW pharmaceuticals have to be manifested.
- Examples: Broken or leaking, repackaged, dispensed, expired > 1 yr, investigational new drugs, PPE contaminated with HW pharmaceuticals, floor sweepings, clean-up material

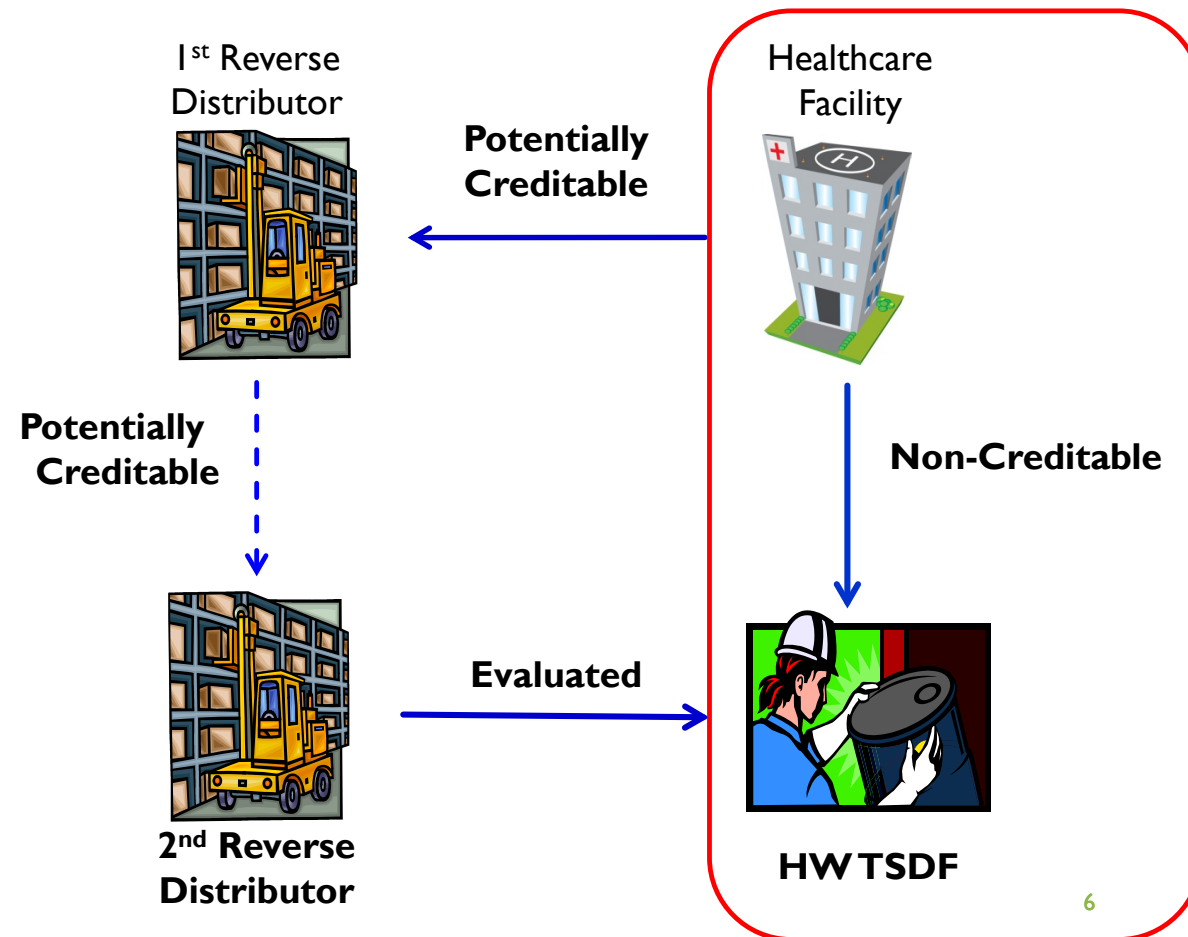


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# NEW MANAGEMENT STANDARDS FOR HAZARDOUS WASTE PHARMACEUTICALS (“PHARMS” RULE) FAQs

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**1. I work for a healthcare facility that is subject to 40 CFR 266 subpart P and I need to initiate a shipment of non-creditable hazardous waste pharmaceuticals to a hazardous waste incinerator. I understand that the regulations require PHARMS on the manifest in lieu of waste codes, but I’m having issues fitting the 6-character “PHARMS” in item 13 on a paper manifest. What should I do?**

- Healthcare facilities may choose to use either PHARMS or PHRM in item 13 of the paper or electronic hazardous waste manifest as EPA explained in the following guidance memo, Johnson to Division Directors, December 19, 2019 (RCRA Online #14919).

However, to assist implementation and consistency, EPA requests that implementing Regions and authorized states encourage healthcare facilities to use the four-character code PHRM on both paper manifests and electronic manifests.

**2. Can I include waste codes on the manifest in addition to the PHARMS/PHRM code for shipments of non-creditable hazardous waste pharmaceuticals?**

- Yes. Waste codes are allowed, although not required, on the manifest for shipments of non-creditable hazardous waste pharmaceuticals.

# NEW MANAGEMENT STANDARDS FOR HAZARDOUS WASTE PHARMACEUTICALS (“PHARMS” RULE) FAQs

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3. **What information is required in item 13 of the manifest if I am shipping non-creditable hazardous waste pharmaceuticals from a state where 40 CFR part 266 subpart P is in effect to one where it is not?**
  - Healthcare facilities that are subject to 40 CFR part 266 subpart P are required to write PHARMS or PHRM in item 13 of the manifest but are not required to include individual waste codes. In states that have not yet adopted part 266 subpart P, healthcare facilities are subject to the standard 40 CFR part 262 generator regulations for their hazardous waste pharmaceuticals, which require healthcare facilities to include all applicable waste codes on the manifest. Therefore, we recommend that the healthcare facility/vendor check with those states regarding whether they require all applicable waste codes to be on the manifest for non-creditable hazardous waste pharmaceuticals being shipped from a healthcare facility operating under subpart P but passing through a state or going to a TSDF in a state that has not yet adopted subpart P. In this circumstance, if the state that has not yet adopted subpart P chooses to require waste codes on the manifest, then PHARMS or PHRM, as well as all applicable waste codes, would be required on the manifest. This is allowable as explained in the following memo, Johnson to Division Directors, December 19, 2019 (RCRA Online #14919).



### **Do users need to submit COVID-19 signature substitute documentation?**

- No, waste handlers should maintain documentation but are not required to submit unless requested.

### **Is the EPA allowing 6-copy paper manifests?**

- Currently, the EPA will accept the obsolete 6-copy paper manifest but we strongly recommend use of the 5-copy forms to avoid confusion.

### **Does a PCB generator notify TSCA before manifesting PCB waste and do they use a TSCA ID or RCRA ID?**

- Depends, please review the conditions in 40 CFR 761.65 to determine if you must notify TSCA. The RCRA ID is used only if it was registered using form 7710-53, otherwise a TSCA ID will be assigned.

## **If a site's only Site Manager leaves the company, who has the power to designate a new Site Manager?**

- Consult your appropriate state agency. Once a new Site Manager is approved, additional Site Managers should be assigned to avoid this problem in the future.

## **How do you delete an ex-employee?**

- Site Managers can remove ex-employee permissions by utilizing Tools → User Maintenance.

## **What's the projection for 2018 paper manifests to be entered?**

- Of the 70K 2018 paper manifests, 600 with errors remain to be entered. We are working to address those ASAP.

## **Does a TSDF need to register as a broker to create a customer manifest?**

- If arranging a shipment to be received by your site, No. If arranging shipments to be received by a different site, where you would be acting as a broker, Yes.

For further clarification, email [Graham.David@epa.gov](mailto:Graham.David@epa.gov)

FOLLOW-UP TO  
APRIL 14-16, 2020, E-MANIFEST ADVISORY BOARD MEETING

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- **Meeting time:** On April 14-16, 2020 EPA convened the e-Manifest Advisory Board for three-day fully virtual public meeting.
- **Meeting Topic:** “Reengineering Electronic Signatures for Generators and Transporters to Increase Adoption of Electronic Manifests.”
- **Meeting Materials:** All meeting materials (e.g., EPA’s meeting background materials, agenda, presentation materials, meeting transcript, and public comments) are available in the public docket at [www.regulations.gov](http://www.regulations.gov) under docket no. [EPA-HQ-OLEM-2020-0075](https://www.regulations.gov/docket/EPA-HQ-OLEM-2020-0075).
- **Final Meeting Minutes/Report:** The final e-Manifest Advisory Board meeting report/minutes will be completed and made publicly available in the public docket approximately 90 days after the close of the April 14-16, 2020, e-Manifest Advisory Board public meeting. The meeting minutes entail the Board’s official recommendations provided to the Agency during the public meeting.

# SYSTEM FUNCTIONALITY UPDATE/DEMONSTRATION

## *e-Manifest*

- June 12 Production Release
  - Industry Reporting version 1 **Demonstration**
  - Added a "Siteregistered" flag to emanifest.json and site-details to let sites know if another site has a registered e-Manifest user.
  - MTN-exists can now handle lowercase MTN suffixes.
  - Data quality checks, reminders and assistance regarding generator data entry in the industry user interface.
- Future functionality
  - Optical Character Recognition (OCR) of Manifest Tracking Numbers **Demonstration**

# LIVE Q AND A

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## CONTACT US AND STAY INFORMED

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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](mailto:eManifest-subscribe@lists.epa.gov)
- To subscribe to the developers only Listserv send a blank message to: [e-manifestdev-subscribe@lists.epa.gov](mailto:e-manifestdev-subscribe@lists.epa.gov)
- Visit the program web site: <http://www.epa.gov/e-manifest>