



e-MANIFEST

MONTHLY WEBINAR SERIES
OCTOBER 2020

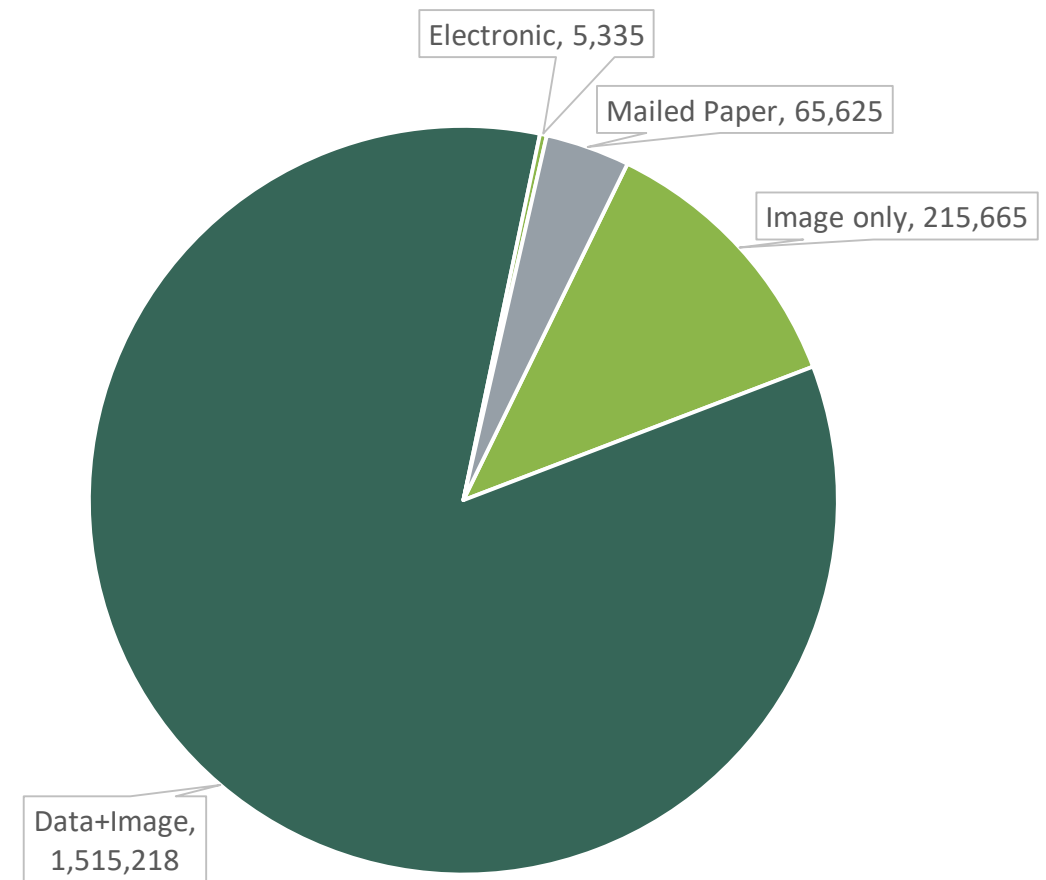


- System statistics update
- Upcoming functionality
- EPA response to e-Manifest Advisory Board
- New signature framework
- COVID-19 paper manifest signature guidance
- Phase out of mailed manifest date
- Guest speaker survey
- Questions

FY 2020 ACTIVITY SUMMARY

e-Manifest

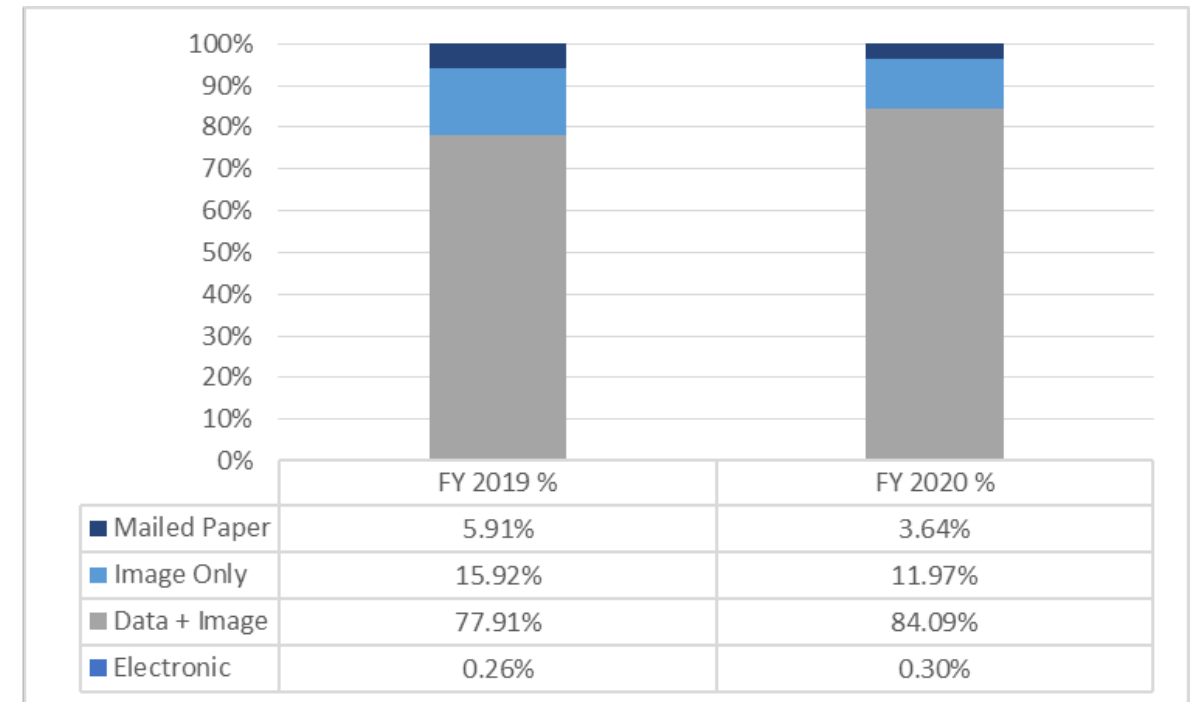
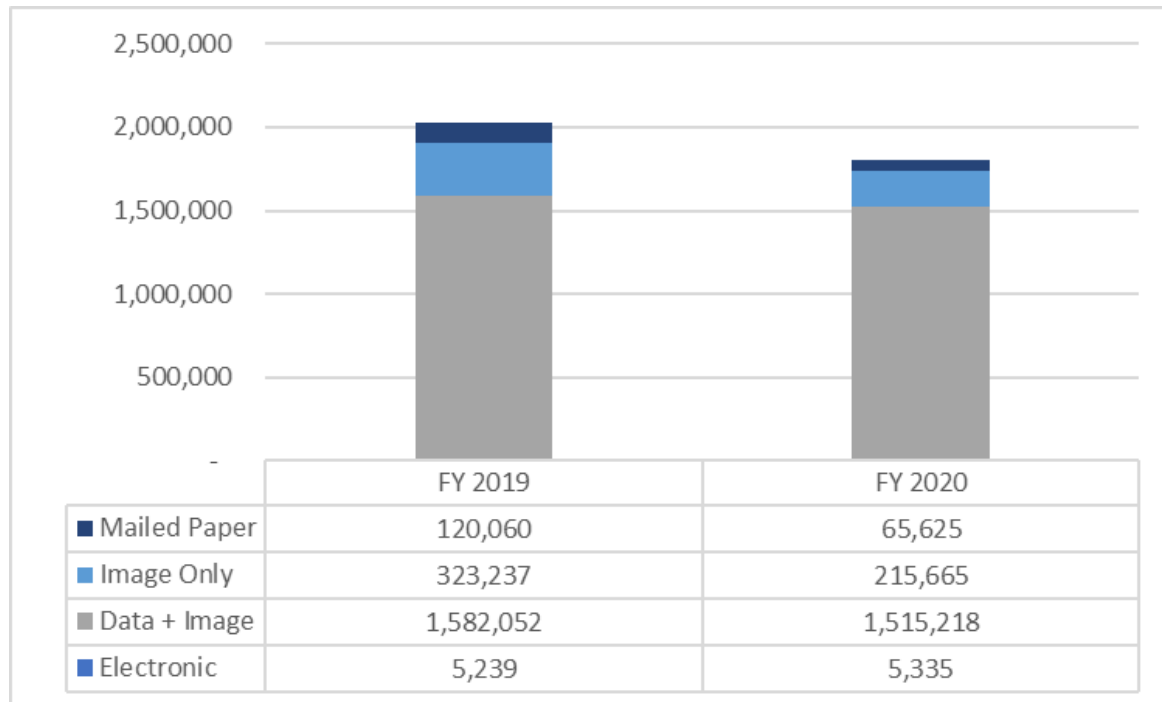
- Submitted manifests: 1.8M
- Submission breakdown:
 - Data+Image: 84%
 - Image: 12%
 - Mail: 4%
 - Electronic: .25%



Manifests FY 2020 Oct 1 – Sep 30

FY 2019/FY 2020 ACTIVITY COMPARISON

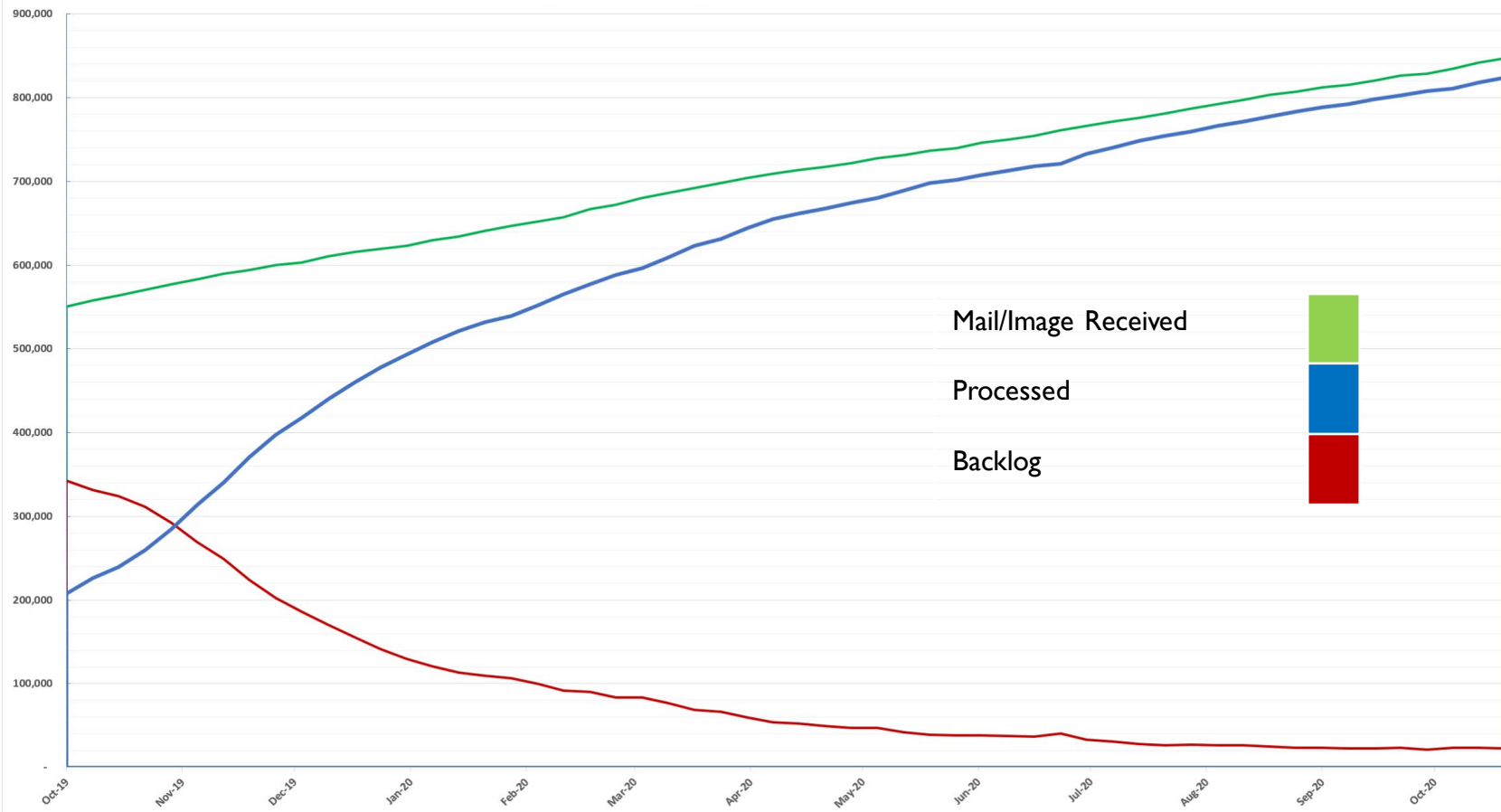
e-Manifest



MAIL/IMAGE BACKLOG UPDATE

e-Manifest

Manifest Backlog and Manifest Processed



- Total Received: 847,039
 - Mail: 219,012
 - Image: 628,027
- Total Processed: 824,483
 - Mail: 214,948
 - Image: 609,535
- Total Backlog: 22,556
 - Mail: 4,064
 - Image: 18,492

UPCOMING FUNCTIONALITY

e-Manifest

- Fall 2020
 - Develop and deploy signature solution(s) based on Board recommendations
 - Billing services for Industry
 - EPA payment reconciliation
- Winter 2020/2021
 - Bulk signature update
 - Automating deletion credits
 - Broker enhancements
- Later 2021/2022
 - Corrections notifications
 - Weekly digest to non-registered users
 - OCR of manifest tracking numbers in production for web and services
 - State correction enhancements
 - User/site preferences – what type of manifest site will accept, allowing generator to move to scheduled
 - PCB unique ID validation

- On April 14-16, 2020, EPA convened the e-Manifest Advisory Board for a virtual public meeting
- Meeting theme was *"Reengineering Electronic Signatures for Generators and Transporters to Increase Adoption of Electronic Manifests"*
- EPA received the Advisory Board recommendations in July; EPA issued its response to those recommendations in October
- All Advisory Board materials can be found at epa.gov/e-Manifest or regulations.gov under docket no. [EPA-HQ-OLEM-2020-0075](https://www.regulations.gov/docket/EPA-HQ-OLEM-2020-0075)

- Based on the Advisory Board's support, EPA confirmed that Cross Media Electronic Reporting Rule (CROMERR) requirements will only apply to receiving facilities when sending the final, signed manifest to EPA and to all entities submitting corrections
- Under this approach, requirements such as identity proofing and two-factor authentication for electronic signatures, will not apply to generator, transporter, and initial receiving facility electronic signatures
- EPA plans to implement these changes this fall (i.e., "Method 2," as proposed to the Advisory Board)

Forthcoming Changes to Electronic Signature for Generators and Transporters

CROMERR Process

Registration Steps

1. User creates account
2. User requests access to site as a Certifier or Site Manager
3. User performs identity validation
4. User creates challenge questions for signature

Signature Steps

1. User clicks "Sign"
2. User must re-enter system password
3. User answers challenge question
4. User clicks "Sign"

Method 2 Process

Registration Steps

1. User creates account
2. User requests access to site as a Preparer

Signature Steps

1. User clicks "Quick Sign"
-

- Based on the Advisory Board's recommendations, EPA is not pursuing Method 1 (signing by email/text) or Method 3 (CROMERR-approved digitized signature pads) at this time; EPA instead will further evaluate other solutions
- EPA agrees with the Advisory Board's recommendation to provide full transparency during development and implementation of electronic signature solutions
- EPA intends to provide regular updates on methodology development to the Advisory Board and plans to hold additional public meetings with stakeholders

- Next steps:
 - Develop system changes to remove CROMERR requirements for generator, transporter, and initial receiving facility electronic signature
 - Discuss and test changes with user community
 - Update web content, FAQs to reflect changes
 - Move to production in early December

NEW SIGNATURE FRAMEWORK

e-Manifest

TEST GENERATOR OF VA

2777 S CRYSTAL DRIVE -
ARLINGTON

VATEST000004

Site Details

myRCRAid

Biennial Report

Annual Report

e-Manifest

WIETS

View: Broker

Create New Manifest

Sign Manifests

Search Manifests

Check Manifest Status

Manifests Awaiting CROMERR Signature **2**

Manifests Awaiting Quick Sign **2**

Sign Manifests

In the table below, select a single or multiple manifests and click Sign. To review before signing, select the appropriate icons to view the scanned paper manifest image (if available) or complete data record.

Filter Manifests

Enter one or more manifest tracking numbers separated by a space or comma

Apply Filter

Clear Filter

Available For Signature

Incoming: **0**

Outgoing: **158**

Transporting: **0**

Corrections: **7**

View: Outgoing

NEW SIGNATURE FRAMEWORK

e-Manifest

Manifests Awaiting CROMERR Signature **2**

Manifests Awaiting Quick Sign **2**

Sign Manifests

In the table below, select a single or multiple manifests and click Sign. To review before signing, select the appropriate scanned paper manifest image (if available) or complete data record.

Filter Manifests

Enter one or more manifest tracking numbers separated by a space or comma

Show entries

Select	Manifest ID#	Type	TSDf ID	TSDf Name	Shipped Date	Last Updated Date	Status	View
<input checked="" type="checkbox"/>	100024074ELC	Electronic	CAT000646117	CHEMICAL WASTE MANAGEMENT, INC.		07/10/2018 05:55 PM	Scheduled	Data

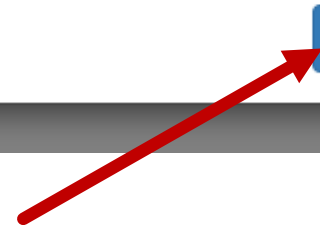
Showing 1 to 1 of 1 entries

Available
Incoming:
Outgoing:
Transportation
Correction:

Confirm

Please confirm that you want to sign this manifest. Depending on this site's role on the manifests, this action will set your User ID as the signer in one of the following sections:

- Item 15. Generator's/Offoror's Certifications
- Item 17. Transporter Acknowledgment of Receipt of Materials
- Item 20. Designated Facility Owner or Opertaor: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a



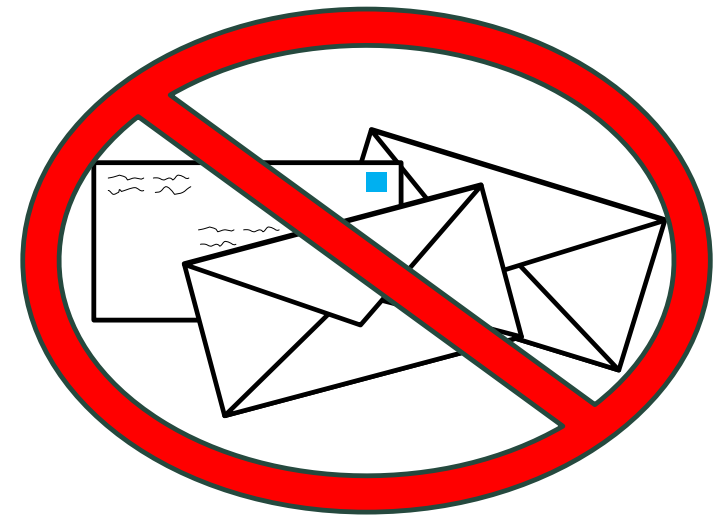
- On August 20, 2020, EPA issued a new memorandum extending its temporary policy regarding how to sign HW paper manifests during COVID-19, for example, when needing to meet social distancing requirements.
- This temporary policy will terminate on **November 30, 2020** and will not be extended.

MAILED MANIFEST PHASE OUT JUNE 30, 2021

e-Manifest

- Beginning June 30, 2021, EPA will no longer accept mailed paper manifest from facilities for processing in e-Manifest.
- Manifest and continuation sheet submissions will be accepted in electronic, hybrid, data plus image, and image format after this date.

Please contact David Graham with any questions
Graham.David@epa.gov



WHO WOULD YOU LIKE TO HEAR FROM?

e-Manifest

- We are currently looking for guest speakers for upcoming monthly webinars.
- Please, let us know by filling out the poll.

Thanks!

SEPTEMBER WEBINAR QUESTIONS

e-Manifest

- **Can data be transferred from e-Manifest to BR reports?**

Currently no, however integration with BR remains a high priority long-term goal; we anticipate discussing BR integration in the forthcoming third e-Manifest rulemaking.

- **It would be helpful if actual edits were flagged on corrected manifest.**

We have looked into this and it would be resource intensive to implement and maintain. We plan to reevaluate in the future.

- **Is it possible to GET signature info from services?**

Yes, it is possible to see who signed each manifest and each version via the services. This information is in the *electronicSignatureInfo* object for the electronic signatures and *paperSignatureInfo* Here is in an example:

```
"designatedFacility": {
  "id": 0,
  "epaSiteId": "string",
  "name": "string",
  "modified": true,
  "hasSiteId": true,
  "registered": true,
  "paperSignatureInfo": {
    "printedName": "string",
    "signatureDate": "2020-10-23T15:09:56.748Z"},
```

```
"electronicSignatureInfo": {
  "id": 0,
  "signer": {
    "firstName": "string",
    "lastName": "string",
    "userId": "string"
  },
  "signatureDate": "2020-10-23T15:09:56.748Z",
  "humanReadableDocument": {
    "id": 0,
    "name": "human-readable.html",
    "size": 185993,
    "mimeType": "TEXT_HTML",
    "storageType": "Local",
    "cloudStorageId": "string",
    "md5Checksum": "string"
  },
```

- **If I make changes to a manifest in e-Manifest, am I required to notify other parties on the manifest?**

There is not a requirement to notify other entities on the manifest. However, all parties on the manifest will receive a weekly email notification of corrections from the system.

- **Could a TSDf notify a generator via an email & link that they may obtain a copy of the signed manifest by going to RCRAInfo?**

No. Following receipt of such an email and link, a generator would still need to register in RCRAInfo and obtain e-Manifest access for its site. Once a generator obtains a RCRAInfo account and can access the uploaded image in the e-Manifest system, a TSDf would not be required to mail a hardcopy of the digital manifest to the generator.

Visit the e-Manifest FAQ webpage

<https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest>

- **Certain states (e.g., CA) require generators to submit a copy of the initial generator copy of the manifest within 30 days. With the mail phaseout, how is the EPA going to address this?**

The EPA's mail submission phaseout does not affect a state's ability to collect a generator's initial copy as the EPA does not collect the generators initial copy (unless it originates in the system as a fully electronic manifest).

- **Beginning in 2021, will use of electronic manifest be required of all HW generators? Would you please let me know when electronic manifest will be required for all industry users?**

There is currently no mandate that all users must track their hazardous waste shipments electronically beginning 2021 or that generators register for e-Manifest by June 2021. However, beginning June 30, 2021, EPA will no longer accept paper manifests via postal mail. Therefore, receiving facilities will need to submit digital copies of paper manifests (data + image or image only) to the system at that time.

Visit the e-Manifest FAQ webpage

<https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest>

LIVE Q AND A

e-Manifest



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- 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>