**Quarterly Webinar Series** 

March 27, 2024

## Agenda

- System updates
- e-Manifest Advisory Board updates
- Multifactor Authentication
- State enforceability and copy of record for states
- Announce upcoming PCB manifest fact sheet
- Remote signer policy refresher

#### e-Manifest System Updates

- Paper Processing Center Correction Requests
  - Ability for the Paper Processing Center to request information and allow industry users to make corrections on manifests that are not clear/illegible on the image
- Patch APIs
  - System-to-System functionality for more surgical updates and corrections to a manifest
- Remote Signer Enhancements
  - Bulk Remote Signer in the UI (there already was a way to do this via System-to-System APIs)
  - PDF Updates for Remote Signer

## e-Manifest Advisory Board Updates

 FR Register Notice: Request for Public Input for Charge Questions to the e-Manifest Advisory Board- Public comment on this notice closed on March 22, 2024

FR Register Notice: Requesting the Public to nominate an IT expert candidate for consideration for current vacancy on the e-Manifest Advisory Board –
 Opportunity for public nominations for this notice is open until April 10, 2024.

### Multifactor Authentication

## e-Manifest

- Agency goal expected to be coming this fiscal year for Industry facing CDX Applications
  - Projected late summer
  - Utilizing Login.gov
- Beginning initial development
- System to System: Should not affect API IDs and Keys
  - The accounts that the API IDs and Keys will need to be migrated to Login.gov

### Multifactor Authentication

## e-Manifest

- Key actions at this time
  - Industry users: None
  - Regulatory users: None
  - e-Manifest/RCRAInfo:
    - Working with EPA to ensure all of our requirements are addressed.
    - Keeping our Industry and Regulatory users informed.

#### State and Federal Enforcement

- States and EPA
  - Submission status/appropriate completion and use of manifest (per the manifest form instructions and federal regulations at §§ 262.20 and 262.23, 263.20 and 263.21 and 264/265.71, and 264/265.72)
  - Submission timeliness
- EPA
  - PCB manifests
  - Interstate issues
  - Subpart FF/nonpayment of fees
  - International shipments
- Entire manifest (image, data, versions) constitutes copy of record for federal and state enforcement

#### **Data Correction**

- States can enforce data errors on the manifest (paper or electronic) such as:
  - Facility IDs and addresses
  - Waste information
- If the manifest image and the data differ, states will have to clarify with the facilities which is correct
  - If the error is with the original manifest, the State can enforce
  - If the error is with the data submission, only EPA can enforce
- States cannot cite to Subpart FF (40 CFR 264/265)

## Upcoming PCB e-Manifest Factsheet

- The PCB Final Rule "Alternate PCB Extraction Methods and Amendments to PCB Cleanup and Disposal Regulations" became effective on February 26, 2024.
- Included updated categories for PCB waste on Manifests § 761.207(a) to align with the categories on the annual report § 761.180(b)(3)(iii)-(vi).

New

Bulk Load of PCBs
 PCB Article Container or PCB Container
 PCB Article not in a Container

Bulk load of PCBs

PCB Container

PCB Transformer

• PCB Large or Low Voltage Capacitor

• PCB Article Container

Other

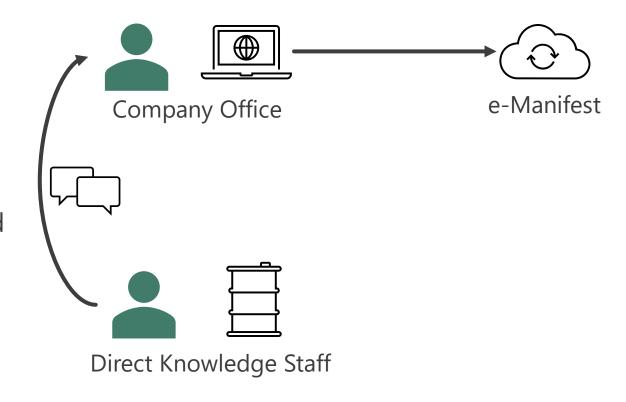
- The e-Manifest team and the PCB Program are developing a **factsheet** to:
  - Provide guidance to PCB handlers on e-Manifest; and
  - Clarify the new PCB waste categories

Anticipated publication Spring 2024

To learn more about the Final PCB Rule visit: <a href="https://www.federalregister.gov/documents/2023/08/29/2023-17708/alternate-pcb-extraction-methods-and-amendments-to-pcb-cleanup-and-disposal-regulations">https://www.federalregister.gov/documents/2023/08/29/2023-17708/alternate-pcb-extraction-methods-and-amendments-to-pcb-cleanup-and-disposal-regulations</a>.

## Remote Signer Policy

- Provides a method for:
  - 1. Signing through system-to-system communication
  - 2. Signing without direct internet access
  - 3. Unregistered individuals to sign electronic manifest through registered coworkers
- Both parties are listed on the manifest copy of record



## Remote Signer Policy – Using RCRAInfo



The individual (Field Personnel) directly responsible for the hazardous waste is ready to take custody of the shipment.

2



The Field personnel communicates that the manifest(s) is ready to be signed and authorizes the Remote Signer to initiate the electronic signature.

3



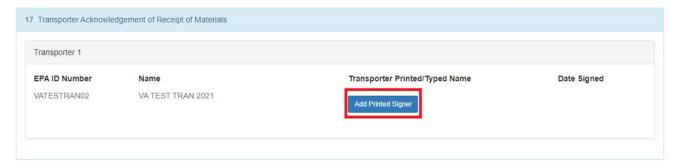
The Remote Signer logs into RCRAInfo (with their own username and password) and signs the corresponding electronic manifest(s).

4

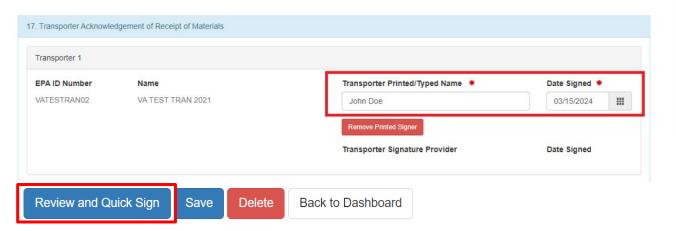


The electronic manifest(s) is successfully signed, the valid and enforceable signature is stored in the e-Manifest system. The status is communicated back to the Remote Signer through the RCRAInfo user interface.

### Remote Signer Steps in RCRAInfo



 The registered user and unregistered user's name are both recorded on the manifest.



Transporter Acknowledgement of Receipt of Materials

Transporter 1

EPA ID Number Name

VATESTRAN02 VA TEST TRAN 2021

Transporter Signature Provider

Kyle Markley

Registered User

Name Date Signed \*
03/15/2024

Date Signed
03/15/2024 09:21 AM

### Remote Signer Policy – For Industry Systems

1



The Site's hazardous waste management software is configured to interface with RCRAInfo using the Remote Signer's API credentials.

2



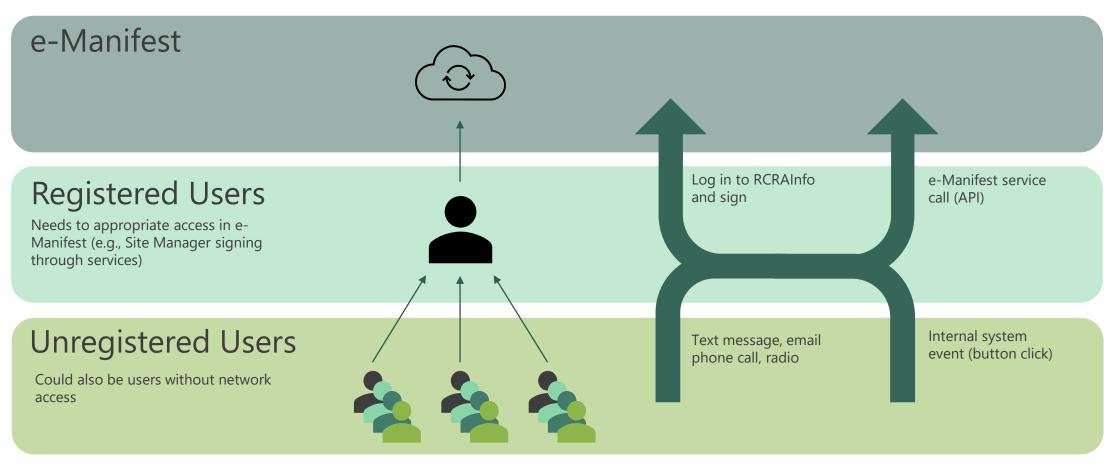
The field personnel logs into their site's hazardous waste management software and initiates the electronic signature. The electronic signature is sent as a request to the e-Manifest system through the API.

3



The electronic manifest(s) is successfully signed, the valid and enforceable signature is stored in the e-Manifest system. The status of the electronic signature process is communicated back hazardous waste management software.

#### Remote Signer Policy



#### Contact Info and Useful Links

- Help desk: (833) 501-6826
- GovDelivery e-Manifest mailing lists
  - https://public.govdelivery.com/accounts/USEPAORCR/subscriber/new
- e-Manifest Program website: <a href="https://www.epa.gov/e-Manifest">https://www.epa.gov/e-Manifest</a>
  - FAQs: <a href="https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest">https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest</a>
  - Webinars: <a href="https://www.epa.gov/e-manifest/monthly-webinars-about-hazardous-waste-electronic-manifest-e-manifest">https://www.epa.gov/e-manifest/monthly-webinars-about-hazardous-waste-electronic-manifest-e-manifest</a>

## Q & A

Please enter any questions into the chat.

