

# e-Manifest Update

Annual REGFORM Missouri Hazardous Waste Seminar

November 7, 2019



- e-Manifest...how's it been working?
- User fees increase & backlog activity
- June 2019 Advisory Board public meeting: “Increasing Adoption of the e-Manifest System”
- Challenges, obstacles & recommendations
- Key deadlines to prepare for

# June 30, 2018 - September 30, 2019

Total Manifests: 2,335,811

Total \$17,806,898

\$6.50

Data+Image,  
1,785,095

\$5

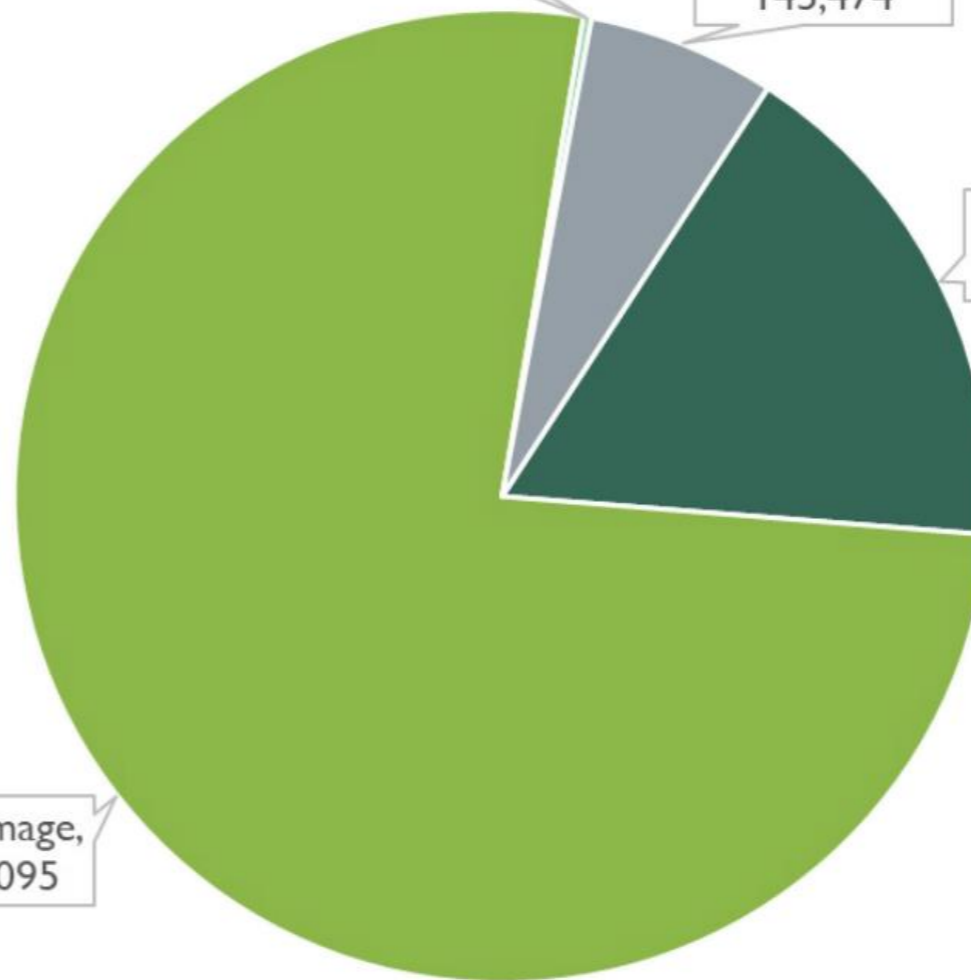
Electronic, 6,150

\$15

Mailed Paper,  
145,474

\$10

Image only,  
399,092



Rhat?! Ruh-roh!!



Submission Type	6/30/2018 – 10/31/2018	6/30/2018 – 9/30/2019
Mailed Paper	9%	6%
Scanned Image Only	23%	17%
Data + Scanned Image	67%	76%
Electronic	<1%	<1%





Submission Type	FY 2018/2019 6/30/2018 – 9/30/2019	FY 2020/2021 10/1/2019 – 9/30/2021
Mailed Paper	\$15	\$25
Scanned Image Only	\$10	\$20
Scanned Image + Data	\$6.50	\$14
Electronic	\$5	\$8

User fees are set based on the projected manifest usage rates and program costs during this period.

Any manifest originating (signed by the generator) on or after 10/1/2019, will be charged the fiscal years 2020 and 2021 user fee rate when submitted to the e-Manifest system by the receiving facility.

Receiving facilities will see their first invoices reflecting the new rates starting in November 2019.

# USEPA e-Manifest

Invoice ID: 15722085  
 Period: 09/01/2018 - 09/30/2018  
 Amount Due: \$46.00  
 Due Date: 10/31/2018

Site ID #  
 Final Receiving Facility Name  
 Address  
 City, State, ZIP Code

Invoice for

## Charge Summary

Current Charges			
Manifest Type	Quantity	Unit Price	Amount
Paper Only	2	\$10.00	\$20.00
Paper + Data	4	\$6.50	\$26.00
Subtotal			<b>\$46.00</b>
Late Payments			
Charge		Rate	Amount
			<b>Total Amount: \$46.00</b>

## Charge Details

Manifest Tracking Number	Generator ID	Shipped Date	Received Date	Type	Amount
		08/23/2018	08/24/2018	Paper + Data	\$6.50
		09/13/2018	09/14/2018	Paper + Data	\$6.50
		07/05/2018	07/11/2018	Paper + Data	\$6.50
		07/16/0018	07/16/0018	Paper + Data	\$6.50
				Paper Only	\$10.00
				Paper Only	\$10.00

# FY 2019 Activity

- Paper Backlog
  - Total processed: 140k
  - Remaining:  $\cong$  11k
- Image Backlog
  - Total processed: 145k
  - Remaining:  $\cong$  227k

# Advisory Board Activities Update

- June 18-20, 2019, e-Manifest Advisory Board public meeting held in Arlington, VA.
- Meeting Theme: “Increasing Adoption of the e-Manifest System.”
- Public Docket Number: EPA-HQ-OLEM-2019-019:  
<https://www.regulations.gov/searchResults?rpp=25&po=0&s=EPA-HQ-OLEM-2019-0194&fp=true&ns=true>
- Final meeting minutes/Board recommendations currently available in the public docket: <https://www.regulations.gov/document?D=EPA-HQ-OLEM-2019-0194-0018>



# Challenges/Obstacles Identified

- HW Generators:
  - Inability to perceive how benefits outweigh the burdens of participation in e-Manifest Program.
  - Unavailability of the System via offline where there is no network connectivity.
  - Complacency with the current paper process.
  - Password and system registration difficulties.
  - Lack of mandate to require generators to participate.
  - Technological limits and oversights causing generators to wait for “Gen 2” or “Gen 3” version before adopting use of the system.

# Advisory Board Recommendations

- Clarifying the requirements and implementation of CROMERR (Cross-Media Electronic Reporting Rule) is one way to encourage greater adoption of fully electronic manifests.
- Simplify the registration process.
- Add features benefitting generators: electronic exception reporting, Biennial Report completion.
- Consider mandating generator registrations.
- Enable broker functionality.
- Address backlog of mailed paper manifests.
- Evaluate “lessons learned” from implementation of the NPDES/DMR online submittal initiative.

# Challenges/Obstacles Identified

- HW Transporters:
  - Ability to utilize the system in an offline mode to complete manifest signatures due to lack of network connectivity at points where they pick up waste from the generator.
  - Difficulty in managing registrations for frequently changing staff.
  - Incompatibility with the Railroad EDI (Electronic Data Interchange) system.
  - Requirement to carry hazardous material shipping papers.

# Advisory Board Recommendations

- Enable e-Manifest with ability to accommodate offline access for scenarios where there is no network availability.
- Permit electronic manifest data entry and electronic signing by registered e-Manifest user in the transporter's home or central office instead of the driver.
- Consider policy modifications to remove the requirement to seek CROMERR approval for those transporters using a signature device that has already undergone CROMERR review.
- Provide additional functionality to sign multiple manifest during their transaction.
- Work more closely with the DOT and its stakeholders to resolve their concern about relying on electronic shipping papers.

# Challenges/Obstacles Identified

- HW Receiving Facilities:
  - Integrating existing industry electronic manifesting systems with e-Manifest.
  - Lack of broker functionality.
  - Inability to access e-Manifest offline to accommodate circumstance in which there is no network availability.
  - Limitations of e-Manifest capabilities...need for enhanced reporting functionality to check errors and identify uploaded unverified manifests.
  - Lack of automated notifications.
  - Technical complexities of selecting proper CROMERR compliant devices.

# Advisory Board Recommendations

- Reduce the burden of TSDF having to mail paper copies back to generator and allow TSDF ability to extract data from e-Manifest to address other reporting requirements (i.e., Biennial Report completion).
- Allow waste services companies the ability to work in offline mode while initiating electronic manifest shipments for their customers (the generator).
- Permit waste management companies to self-assign a pool of manifest tracking numbers to their initiated electronic manifest shipments.



# System Functionality Updates

- **Functionality Under Development**

- Broker/Transporter
  - Allow users to prepare manifest for their customer site
  - Allow users to create manifest
- Weekly activity email
- Adding Generator information to image only manifests

# To Keep on the Radar!

## EPA has signaled...

- Beginning **6/30/2021**, EPA will not accept mailed paper manifests from facilities for processing e-Manifest.
- The use of paper manifests, and the submission of data from paper manifests, whether by image files or data file uploads, will be curtailed by **6/30/2023**; after 5 years of system implementation.
- If meaningful progress is lacking, EPA will seek the Board's advice on a combination of incentives or restrictions (e.g., a regulatory ban of paper manifest use after 2023) to accomplish the goal of realizing all the efficiencies and benefits of an electronic manifest system.

## REGION 7 AND STATE CONTACTS

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