e-MANIFEST

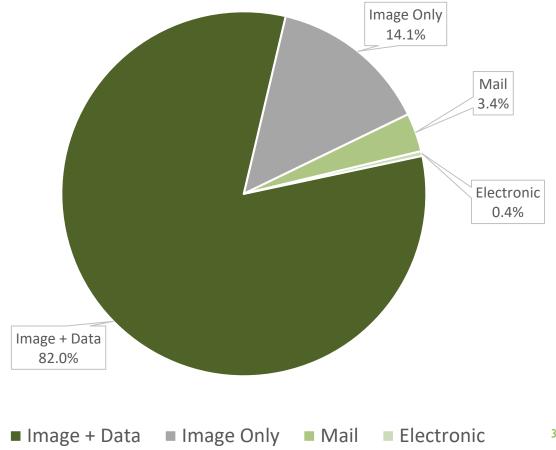
MONTHLY WEBINAR SERIES DECEMBER 3, 2020

AGENDA

- System statistics update
- Functionality update
- EPA response to e-Manifest Advisory Board
- New signature framework
- COVID-19 paper manifest signature guidance
- Phase out of mailed manifest date
- Questions and Answers

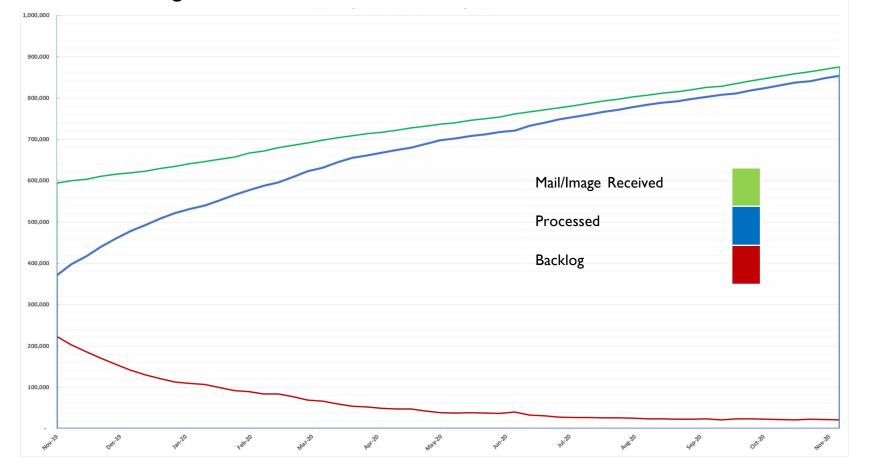
FY 2021 ACTIVITY SUMMARY

- Submitted manifests: 280k
- Submission breakdown:
 - Image + Data: 230k
 - Image Only: 40k
 - Mail: 9k
 - Electronic: 1k



MAIL/IMAGE BACKLOG UPDATE

Manifest Backlog and Manifest Processed



e-Manifest

Total Received: 875,227

Mail: 224,546

Image: 650,681

Total Processed: 853,835

Mail: 220,242

Image: 633,593

Total Backlog: 21,392

Mail: 4,304

Image: 17,008

FUNCTIONALITY UPDATE

- 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. <u>EPA-HQ-OLEM-2020-0075</u>

- 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 <u>not</u> 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)

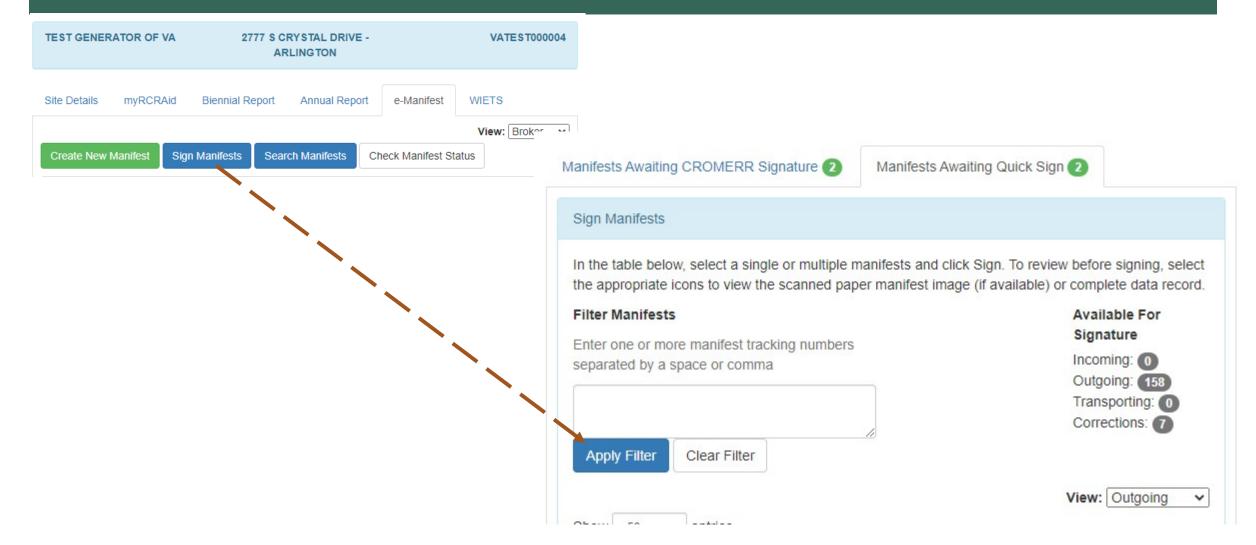
e-Manifest

Changes to Electronic Signatures for Generators and Transporters

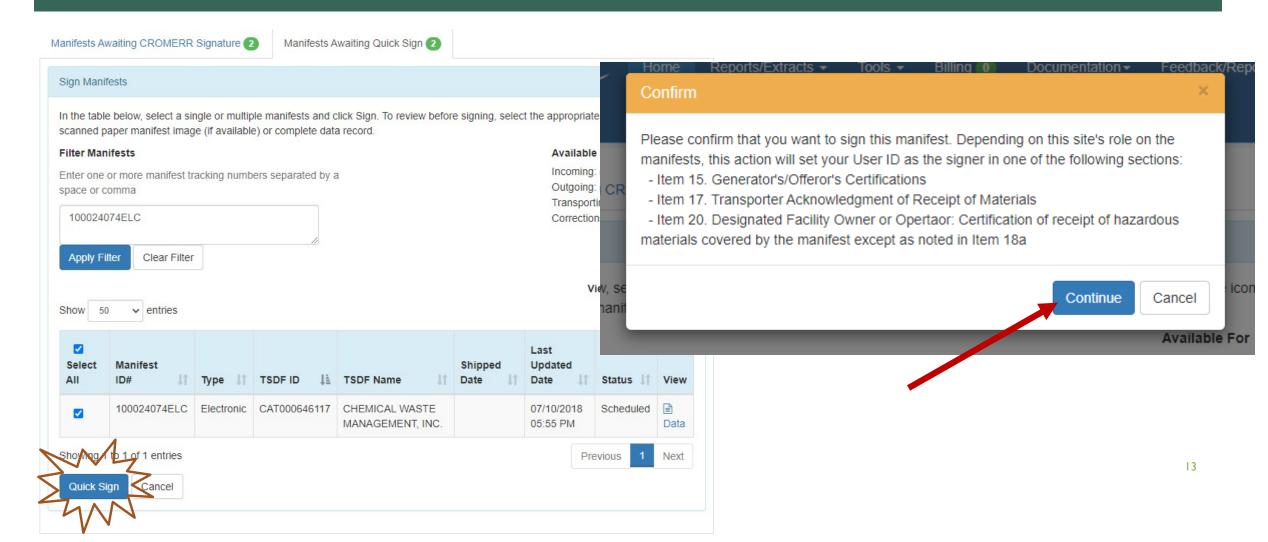
CROMERR Process	Method 2 Process
Registration Steps	Registration Steps
 User creates account 	 User creates account
2. User requests access to site as a Certifier or Site	User requests access to site as a
Manager	Preparer
User performs identity validation	
4. User creates challenge questions for signature	Signature Steps
Signature Steps	 User clicks "Quick Sign"
1. User clicks "Sign"	
User must re-enter system password	
User answers challenge question	
4. User clicks "Sign"	

- Next steps:
 - Develop system changes to remove CROMERR requirements for generator, transporter, and initial receiving facility electronic signature
 - Going live December 4, 2020
 - Discuss and test changes with user community
 - Ongoing since November 2020
 - Updating web content, FAQs to reflect changes
 - Check out https://www.epa.gov/e-manifest

NEW SIGNATURE FRAMEWORK



NEW SIGNATURE FRAMEWORK



COVID-19 PAPER MANIFEST SIGNATURE GUIDANCE

e-Manifest

Reminder: EPA's temporary policy regarding how to sign HW paper manifests during COVID-19 terminated on November 30, 2020.

MAILED MANIFEST PHASE OUT JUNE 30, 2021

e-Manifest

- Beginning <u>June 30, 2021, EPA will no longer accept mailed paper manifests</u> from facilities for processing in e-Manifest.
- At that time, manifest and continuation sheet submissions will be accepted in electronic, hybrid, data plus image, and image format.

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



QUESTIONS AND ANSWERS

e-Manifest

- How will Method 2 affect signatures from third party software and APIs? Currently there are no electronic signatures from third party software. Any future plans will be developed through robust engagement with the user community. However, sites can retrieve the electronic SignatureInfo element, which is now an array instead of an object.
- Is integrating e-Manifest with third party systems a "hot button" topic?
 - e-Manifest has relied heavily on its system-to-system data transfer services and will continue to prioritize future developments and enhancements based on user needs.
- Is there anything in the works for waste transporters who have multiple manifests and are in a lengthy line of transporter only signatures?

Yes, there is a bulk sign page which can filter on manifests you wish to sign. We also have the UI Link service which can be used with your system to direct the user to a filtered bulk sign page so that user can only see the manifest you want them to see and sign.

```
"electronicSignatureInfo": {
    "id": 0,
    "signer": {
        "firstName": "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"
}.
```

QUESTIONS AND ANSWERS

e-Manifest

- Will there ever be a way to print labels from RCRAInfo or e-Manifest?
 This is not in the current scope of the e-Manifest project.
- Will flatfile upload capability ever be available to generators to create manifest?
 This may be considered for future e-Manifest functionality.
- Will Method 2 allow users to use a basic signature pad?

Method 2 is the beginning of a larger effort to make using electronic manifests easier. We will continue to work with our partners to explore, implement and enhance the electronic signature process.

QUESTIONS AND ANSWERS

- With Method 2, do transporters still need to log in to get to the "Quick Sign" button from the field?

 Yes, users who wish to electronically sign must have previously registered, been granted site permissions, and log in when electronically signing. Implementing "Quick Sign" is a major step towards 100% electronic manifesting for
 - in when electronically signing. Implementing "Quick Sign" is a major step towards 100% electronic manifesting for generators and transporters, and EPA is committed to exploring solutions that will make using electronic manifests easier.
- With the "Quick Sign" feature, is there a way to prove who actually signed a manifest electronically? Can I bulk sign days in advance?
 - Users will be logged in to their accounts when electronically signing. Users must also continue to sign in sequence, just like a paper manifest, to signify the transfer of custody. The persons signing should have knowledge of the hazardous waste shipment, and the date and time should reflect the transfer of custody.
- Is there something states should do to help reduce data quality errors seen in e-Manifest?
 - We encourage state regulators to stay in contact with their EPA Regional POCs for e-Manifest. EPA is currently assessing and characterizing e-Manifest data quality issues and those lines of communication will become essential for future efforts.

LIVE Q AND A



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CONTACT US AND STAY INFORMED

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