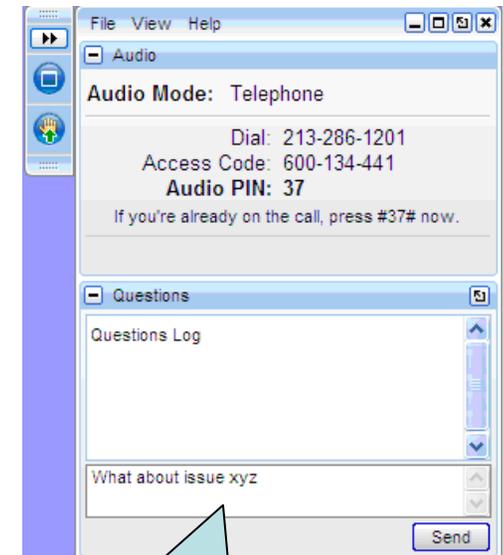# e-Manifest System Webinar #4

Practical Expectations for System Performance and Anticipated Stakeholder Benefits

June 23, 2009
1:00PM - 3:00PM EDT

Introduction

- Facilitator: Janet Pershing
- Roll call
- Last of four scheduled webinars on e-Manifest
- Ground Rules
  – Lines will be muted until the discussion period starts.
  – Type in your questions and we'll review them at the Q&A period
- To help facilitate an orderly discussion, please send a typed question or comment to the facilitator by:
  – Typing your question into the Question Pane of GoTo meeting
  – Clicking the Send button
  – Your question will appear in the Question Log

Type your question here and click Send

Agenda

- Expectations for e-Manifest
- e-Manifest role in quality improvement
- e-Manifest role in efficiency improvement
- Concerns about e-Manifest implementation
- Next steps in the e-Manifest process

Expectations: Real-Time System

- The system will offer some real-time service
- The system could also offer off-line manifest completion with later data uploads to the system. These capabilities would address:
  - Users in locations without immediate access
  - Users that prefer to work off-line and 'batch' upload
  - Instances when the system is temporarily unavailable due to system outages
- No current expectation to allow electronic manifest use unless all handlers can participate in electronic system

Expectations: Policy Changes

- The e-Manifest system will automate the current paper manifest process
  - Submission requirements and procedures generally will remain consistent with existing regulations and will not create or require new tracking procedures for manifest completion
  - Same set of Federal RCRA and state regulated wastes eligible
  - The system will be coordinated with DOT requirements, which may allow electronic shipping papers during timeframe for e-Manifest development
  - Changes could be made to both paper and e-Manifests (e.g., more precise recording of quantities received and accepted for the purposes of more accurate reporting)
  - Accommodations may be made for biennial reporting
- The e-Manifest system will be designed flexibly to accommodate future changes in legislation, rulemakings, and technology

Expectations: Paper Manifests

- While electronic manifest use will not be mandatory, all manifests (paper and electronic) will need to be submitted to e-Manifest system
- Data from paper manifests will be keypunched or uploaded into the data system to create a single unified data system
- A fee will be assessed to process both electronic and paper manifest data. Fees will support the system over the long haul
- Integration of paper and electronic forms may not be immediate
  - Electronic management of paper manifest data may be phased in during the early part of the program
  - The most effective way to collect and process paper manifest data must be determined.
    - States or EPA might collect paper manifests
    - Industry may wish to submit data and scanned images via direct upload or by submitting hard copy.

Expectations: Phasing

- e-Manifest and Biennial Report integration is expected to take place early-on
- Other activities are expected to be phased in during later stages
  - Integration of transboundary waste tracking systems
  - Exception and discrepancy reporting
  - Land Disposal Restriction (LDR) notices

Expectations: Additional Work to Do

- EPA will continue working on a range of topics including:
  - E-Signatures
  - Confidential Business Information (CBI)
  - Coordination with DOT electronic shipping papers
  - Integration with rail systems
  - Fees

Discussion Questions

Question 1: In what ways do you expect e-Manifest to affect the **quality** of the work you do? For example:

- What current activities will you be able to do better with e-Manifest?
- What new activities will you be able to do for the first time with e-Manifest?
- Would e-Manifest improve compliance by manifest users and, if so, how large or significant would the improvement be (e.g., for your organization)?
- Would e-Manifest improve oversight and management of hazardous waste and, if so, how large or significant would the improvement be?

Discussion Questions

Question 2: In what ways do you expect e-Manifest to affect the **efficiency** of the work you do? For example:

– What systems or programs will you be able to coordinate better with e-Manifest?

– How will e-Manifest help you be more efficient in doing your jobs and how much more efficient would you be (e.g., marginally or significantly)?

Discussion Questions

Question 3: What lingering **concerns** do you have about the effect that e-Manifest could have on your operations? How significant or pressing are these concerns (e.g., could they dissuade you from participating in the system)?

Next Steps in the e-Manifest Process

- Legislation is still required
  - A bill may be introduced in the House by the July 4th recess
  - A Senate version should be closely coordinated with the House version
- The legislation is likely to:
  - Require completion by EPA of authorizing regulations in one year
  - Provide EPA with 3 years to establish a system
  - Authorize EPA to require paper manifest users to submit manifests (or data) and pay fees for processing
  - Require a procurement process with user fee-funded contract
  - Require development of fee schedules based on projected system costs and volume of usage
  - Provide oversight through an Advisory Board to oversee system operation
  - Require regular audits and accounting for fee revenues and expenditures

Next Steps in the e-Manifest Process

EPA will:

- Consider all stakeholder input to date as the process moves forward
- Resolve issues throughout system procurement and regulation development
- Continue to work with user groups in the future

Additional Input

Please send additional comments for EPA to emanifest@icfi.com:

- Additional suggestions
  - Concerns
  - Alternate approaches
- Examples
  - How your organization expects to benefit from e-Manifest
- Estimates
  - Number of hours or dollars e-Manifest is expected to save or cost your organization
  - Specific observations about why/how e-Manifest is expected to affect your program
  - Anecdotal information to illustrate costs or savings

THANK YOU!

Your participation has been greatly appreciated!