e-Manifest Developers Workshop

Agenda

- Introduction and Goal Setting
- Current and Upcoming Functionality
- Notifications
- Communicating to the Users
- Policy
- Industry Billing
- Getting Generators and Transporters Registered
- Implementing the Electronic Workflow
- Electronic Signature Pads
- Quick wins/Next Steps
- Adjourn

Goal Setting

1. Continue to develop e-Manifest to deliver user-required functionality

2. Discuss Transporter/Generator engagement in the system

3. Create a set of standards and best practices for communicating electronic manifest information across e-Manifest sites/users

4. Come out with some quick wins

Current Industry Functionality

- All basic manifest functionality for all types of submission manifests – through UI or Services
- Corrections
- Search
- Sign up to 50 manifests at a time
- Check manifest status
- Site manager functionality
- Notification of signed manifest
- Ability to submit enhancements/bugs directly to EPA developers

Upcoming Functionality

- Ability to add generator information to image only – Sept 2019
- State corrections to manifest data - Fall 2019
- Transporter/Brokers – Fall 2019
- Additional notifications of Manifest Activity – Fall 2019
- Automated Manifest Tracking Number Check – Testing 2019
- Industry Billing Enhancements - 2020
- Industry Reporting – 2020
- *3rd Party Electronic Signatures - 2020*

Notifications

- Currently developing Weekly Digest, but we have heard that users want more real time messaging.
- This will require contact preferences
- Potential preference options
  - Individual emails
  - Daily digest
  - Opt out
  - The ability to GET notifications via services

Notifications

Manifest Type and Action	Who gets the notification
Electronic/Hybrid • When a facility is added to a manifest • When a manifest is moved to scheduled • When a facility is the next signer • When a facility is removed • Upon signature all other signers on the manifest get a separate email stating a manifest with their facility listed on it has been signed and updated.	• Which users? (e.g. all certifiers/site managers for an EPA ID, Contact Email for Generator and Transporter entities) • Should this just be the individual certifiers who signed the manifest or should additional site users?

Notifications

Manifest Type and Action	Who gets the notification
Paper Manifests • When a manifest is QA Complete from PPC (Mail and Image Only) • When uploaded as Ready for Signature by the TSDF (Data Image 5 Copy)	• Ideal for digest emails • Which users (e.g. all certifiers/site managers, Contact email for Generator)? • Make email notification opt-out on the manifest form - we have a space for generator email, TSD can select "notify" via slider. • Generator receives email notification with MTN and information on how to register
Corrections • When a manifest is corrected	• Waste line information being changed, other key areas very important • Other areas (Box 14, not important) • Would like more information about how this involves the CROMERR repudiation process

Communicating to Our Users

- How do you get e-Manifest software updates?
- If you have a question, how does it get answered?
- What would better communication on software development look like?

Policy Update

- New rulemaking to extend e-Manifest to export manifests and other manifest-related reporting (Discrepancies) – *In early stages*
- PHARMS code – effective 8/21/2019

Financial Overview

- Fee rate change
- Invoice impact of fee change
- Discussion on suggested invoicing changes

Fee Changes

- EPA announced fees for the next two fiscal years starting in Oct. These are include:
    - Mailed paper - $25
    - Image only - $20
    - Image + data - $14
    - Electronic/hybrid - $8.
- Applies to manifests on October invoice so they will show up in November 2019.
- Program will be adding personnel to improve user experience and encourage greater electronic adoption. This includes
    - IT development support
    - CROMERR electronic system developmental support
    - Reporting and database support
    - Industry/State outreach and implementation support
    - Program management support

Billing Impacts for Credit Card Payment

- There is a $24,999.99 daily per credit card limit set by the Department of Treasury. This is a hard limit and cannot be waived.

- This will impact current invoices around $20k.

- Due to the Treasury cap, for invoices that are >$25k, you are effectively limited to using ACH transfers.

- This may require setting up the EPA as a vendor in your accounting systems and/or require changes to corporate policy that allow ACH payments.

Request #1: Consolidate Invoices

- This request is to allow site managers to pay several invoices at the same time.
- We have scoped this request.   It will allow site managers to check each invoice that is on their dashboard and require them to input their financial information one time.
- There are no major developmental or administrative challenges to this; only a queue of more requested developmental updates in front.
- Consolidated invoices are still held to Treasury credit card daily limits
- Based on user feedback, we could roll out this update in 2020.

Request #2: Storing Financial Data

- The request is to store financial data in e-Manifest so it doesn't need to be entered monthly.
- There are major administrative and developmental challenges to doing this.
  - Storing financial data would make RCRAInfo a financial system of record. EPA policy states that there is only can only be one system of record, which is Compass.
  - Additionally, storing financial data would require a significant investment in both time and financial resources to upgrade the security of the entire system.
  - This would effectively push all other major developmental updates out of the way.
- EPA is not considering this for development.
- *Consideration – work with your IT department to store payment information in browser profile and/or secure smartphone.*

Request #3: Splitting Invoice Payments

- The request is to allow users to pay parts of their invoice.
- This poses significant developmental and administrative challenges. Developmentally this would require creating new data fields, tables, and query logic to allow.
- There are also Agency discussions about how this would impact the amount considered late (if not paid in full), calculating late penalties, and the Treasury collections process. These need to be worked out.
- We are rejecting this request for the time being as it poses more challenges and time than the perceived benefit.

Request #4: Who can pay an invoice

- The request is to allow someone other than a Site Manager to pay invoices.
- This poses some administrative challenges, particularly in the development of a new credential. This would pose more questions about this credential than in the number of requests we have received.
- We believe the solution to this is to have someone who can pay your invoices register as a site manager.
- Feedback/thoughts on user management
  - Site manager
  - Certifier
  - Preparer
  - Viewer
  - None

Transporter/Generator Registration

Site Type	Active Sites*	% With Site Manager/Certifier
Receiving Facilities		
Generators (LQG)		
Transporters		

- Areas of improvement:
  - Getting LQGs who regularly ship waste and are currently receiving mailed copies back from receiving facility
  - Transporters who routinely interact with those aforementioned LQGs

Implementing the Electronic Workflow
Manifest Statuses

- *Draft – only visible to site creating the manifest*

DRAFT — PENDING — SCHEDULED — IN TRANSIT — RECEIVED

Implementing the Electronic Workflow
Manifest Statuses

- *Pending – visible to all parties listed on the manifest*
    - *Needs generator contact/emergency phone to enter this status*
    - *Manifest tracking number assigned at this stage*

DRAFT — PENDING — SCHEDULED — IN TRANSIT — RECEIVED

Implementing the Electronic Workflow
Manifest Statuses

- *Scheduled - contains all of the information needed to sign a manifest*
  - *Generators and transporters will have limited ability to edit and remove wastes. They cannot add new wastes.*
  - *All users are still able to add and remove reference information (Section 14)*

DRAFT ———— PENDING ———— SCHEDULED ———— IN TRANSIT ———— RECEIVED

Implementing the Electronic Workflow
Manifest Statuses

- *In Transit - indicates that the waste has been picked up at the generator site by the specified transporter and is now in route to the receiving facility*
  - *The receiving facility may specify additional transporters, as needed.*
  - ***If the manifest has only one transporter, the status will be placed into the "Ready For Signature" status once the transporter signs the manifest.***

DRAFT ——— PENDING ——— SCHEDULED ——— **IN TRANSIT** ——— RECEIVED

Implementing the Electronic Workflow
Manifest Statuses

- *Ready for Signature*
  - *For electronic, hybrid, and on-behalf-of manifests, this status is set when the last transporter signs the manifest.*
  - *For paper manifests, this status is set once the paper manifest has been uploaded into the system.*

DRAFT — PENDING — SCHEDULED — IN TRANSIT — RECEIVED

Implementing the Electronic Workflow
Manifest Statuses

- *Signed*
  - *The manifest is placed into the "Signed" status once the receiving facility completes the initial signing ceremony and enters the Received Date.*
  - ***The manifest is not complete at this time and may be missing information such as Management Method and Discrepancy information.***

DRAFT — PENDING — SCHEDULED — IN TRANSIT — RECEIVED

Implementing the Electronic Workflow
Manifest Statuses

- *Signed-Completed*
  - *Manifest has been signed and it passes all validations*
  - *Manifest will be added to the receiving facility's invoice for fee collection.*
- *Under Correction*
  - *If an entity party to the manifest (i.e., the state, generator, transporter, receiving facility, or alternate receiving facility) initiates a correction to a previously signed manifest, the status will be set to "Under Correction".*
  - *The manifest will remain in this status until one party re-signs the manifest to certify the corrections.*
- *Corrected*
  - *If a manifest undergoes corrections and is re-signed by one party to the manifest (i.e., the state, generator, transporter, receiving facility, or alternate receiving facility), the status will be set to "Corrected".*

Implementing the Electronic Workflow
Standardizing Information

- *Handler Information*

- *Waste information*

- *Reference information*

Must Read: e-Manifest Services Documentation

Implementing the Electronic Workflow
Reference Information – Manifest Level

14. Special Handling Instructions and Additional Information

Special Handling Instructions for this Manifest

Reference Information for this Manifest

Optional for internal tracking. e.g. Customer # or Purchase Order #

EPA ID Number	Label	Description	Action
VAD000532119	Select a label ▾		✖

Select a label
Customer #
Purchase Order #
Truck #
Trailer #
Plate #
Original Manifest Tracking Number
Other

Add Another Row

Implementing the Electronic Workflow
Reference Information – Waste Line Level

14. Special Handling Instructions and Additional Information

Special Handling Instructions for this Waste

Reference Information for this Waste

Optional for internal tracking. e.g. Container Size or Profile #

EPA ID Number	Label	Description	Action
VAD000532119	Select a label ▼		✖

Select a label
BR Density
BR Density Units
Profile #
Container Size
Specific Emergency Response Phone #
Contract #
Other

Add Another Row

Electronic Signature Pads/Applications

- Manifest solutions must be built to comply with CROMERR

- Users of e-Manifest must comply with all applicable CROMERR requirements

- EPA is evaluating options such as:
  - 3rd party devices (signature pads)
  - Smartphone applications

Quick Wins/Next Steps

Contact Information

- Submit input/questions to eManifest@epa.gov
- To subscribe to the general interest e-Manifest ListServ send a blank message to: eManifest-subscribe@lists.epa.gov
- To subscribe to the development-focused e-Manifest ListServ, send a blank email to: e-ManifestDev-subscribe@lists.epa.gov.
- For more information on EPA's Manifest Program: http://www.epa.gov/e-Manifest
- To track the progress of e-Manifest visit: https://github.com/USEPA/e-manifest/