

# e-Manifest User Fees: Proposed Rule Notice

E-Manifest Webinar  
June 30, 2016

# Agenda +

- ▶ Rule Update
- ▶ Background:
  - ▶ Statutory Mandates
  - ▶ February 2014 “One Year Rule”
- ▶ Summary of Fee Related Proposals
- ▶ Non-Fee Related Contents of Proposed Rule
- ▶ Discussion of Projected Benefits, Savings, and Costs:
  - ▶ Regulatory Impact Analysis
- ▶ Submitting Comments on the Proposed Rule
- ▶ System Development
- ▶ e-Manifest Advisory Board Update
- ▶ Questions

# User Fee Proposed Rule Updates

# Rule Update +

- ▶ EPA Administrator signed the Rule on Monday, June 27, 2016
  - ▶ A pre-publication version of the proposed rule on EPA web page:
  - ▶ Refer to the official version in a forthcoming FR publication, which will appear on the [Government Printing Office's FDsys website](#). Once the official version of this document is published.
  - ▶ Comments on this proposal will be accepted for 60 days following publication of this rule in the Federal Register through a new GSA comment platform being piloted in this rule.

# E-Manifest Act Mandates

- ▶ Hazardous Waste Electronic Manifest Establishment Act (e-Manifest Act) signed into law on October 5, 2012.
- ▶ E-Manifest Act established several mandates for EPA:
  - ▶ Develop fee-funded electronic tracking system for HW shipments,
  - ▶ Collect all manifests – electronic or paper (new EPA role),
  - ▶ Establish Advisory Board per FACA to oversee system performance and fees, and
  - ▶ Issue implementing regulations within one year of enactment.
- ▶ EPA issued its “One Year Rule” to implement Act in February 2014 (79 FR 7518, 2/7/2014).
  - ▶ Established legal and policy framework for using electronic manifests,
  - ▶ Codified key provisions of e-Manifest Act on scope, optional use of electronic manifests, and consistent implementation in states, and
  - ▶ Addressed other policy issues:
    - ▶ Recommended: Practical e-signature methods to meet EPA’s CROMER Rule,
    - ▶ Determined: Manifest data cannot be claimed CBI,
    - ▶ Explained: Requirements for continued use or submission of paper manifests.
- ▶ One Year Rule deferred fee determinations and an RIA until this action.

# E-Manifest Act Mandates (Cont'd) +

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- ▶ One Year Rule deferred fee determinations and an RIA until this action.

# Fee Authority +

- ▶ Proposed Fee Rule premised on e-Manifest Act's unique fee authorities:
  - ▶ EPA authorized to impose “reasonable service fees as determined necessary” to pay costs of:
    - ▶ Developing, operating, maintaining, and upgrading system, and
    - ▶ Collecting and processing data from any paper manifests still in use.
  - ▶ Fees shall be collected in advance of or as reimbursement for services.
  - ▶ Collected fees shall be deposited in special System Fund in Treasury.
  - ▶ Fees deposited in Fund shall be made available to extent of appropriations, w/o FY limitation.
  - ▶ Act authorizes adjustment of fees when development costs recovered and when accounts show significant disparity between collections and spending.

# Key Questions Addressed by Proposed Rule

1. Which users and transactions will be subject to fees?
2. How and when will users pay their fees?
3. What costs will be included and tracked in EPA's fee methodology?
4. What model or formula will EPA use to determine fee amounts?
5. How will rule address fee "trajectory" and fee revisions?
6. What sanctions needed to induce prompt payment?



# 1. Users & Transactions Subject to Fees

- ▶ Which users: Members of regulated community required to use HW manifest to track their waste shipments.
  - ▶ Consistent with “user” definitions in e-Manifest Act and One Year Rule
  - ▶ Result: Data consumers, e.g., states and public, will not be charged fees
- ▶ The NPR would further narrow fee obligation to ~ 400 receiving facilities (TSDFs) that receive waste from off-site for management.
  - ▶ Decision premised on efficiency relative to involving > 100,000 generators in payment system
- ▶ What transactions are subject:
  - ▶ Final manifest submission signed by TSDF is the major billable event.
  - ▶ Other fee collection events proposed as “fee premiums:”
    - ▶ Data correction submissions by TSDFs, and
    - ▶ Sorting and returning stray or erroneous paper documents.

## 2. How and When Fee Payments Made

- ▶ **Proposed option: Bill TSDFs monthly for previous month's actual manifest usage**
  - ▶ TSDF users will receive electronic invoices showing their manifest activity and charges.
  - ▶ TSDFs will be directed to Treasury's Pay.gov site to submit electronic payments.
  - ▶ TSDFs prefer this option for its accuracy and consistency with commercial practices.
  - ▶ Involves some revenue stability risk for EPA if payments late.
- ▶ **We solicit comment on alternative advance payment option:**
  - ▶ TSDFs would develop estimate of monthly manifest usage based on previous year's data and compute fee amounts due based on this estimate.
  - ▶ TSDFs would submit an automated and fixed, monthly payment as an ACH debit from a commercial bank account.
  - ▶ System would send one invoice at year's end to reconcile estimated and actual usage.
    - ▶ Fosters revenue stability while involving perhaps reduced invoicing costs for EPA.
    - ▶ TSDFs not enthusiastic, unless savings or incentives are significant.

# 3. What Program Costs are Fee Recoverable

- ▶ NPR identifies several categories of program related costs:
  - ▶ **System Setup:** All system related costs incurred prior to system being operational
  - ▶ **Operations & Maintenance:** All system-related costs incurred after system is operational
  - ▶ **Indirect Costs:** Enabling and supporting costs not captured by above categories

# 4. What Formula for Fee Calculations -- A Differential Fee Approach +

- ▶ Fee Formula models are all aimed at distributing program costs over total #s of manifests
  - ▶ Major cost categories are System Development Costs and Operations and Maintenance Costs
  - ▶ These can include EPA's internal program costs as well as extramural costs for IT contracts and reg. support
  - ▶ System development costs to be amortized over 5 yrs. and repaid to Treasury
- ▶ EPA considered 3 distinct Fee formula options for the NPR:
  1. **Average Cost:** All costs distributed evenly over all manifests,
  2. **Differentiated:** Distinguishes marginal labor costs for keying data, conducting Q/A, and processing of the several manifest submission types:
    - ▶ Fully electronic and 3 paper submission types (mailed, image file, data upload) all have distinct processing costs giving rise to differential fees
  3. **Highly Differentiated:** More aggressive variant of Option 2, as it burdens the paper manifests with all non-labor costs of paper processing center
- ▶ NPR proposes a hybrid combining features of 2<sup>nd</sup> and 3<sup>rd</sup> options:
  - ▶ Initially, implement the **Differentiated Fee** option, which does not penalize the transition from paper as severely.
  - ▶ But if electronic manifest use does not reach 75% after 4 years, NPR would subsequently shift to Option 3's
  - ▶ more aggressive model to calculate fees. This should incentivize greater shift to electronic manifests.

# 5. How to Address Fee Trajectory and Revisions

- ▶ Consistent with Circular A-25, the NPR proposes a 2-year fee revision cycle:
  - ▶ We re-run the formula with most recent costs and manifest #s every two years.
  - ▶ We publish the resulting 2-year fee schedules to our program web site.
  - ▶ We chose the 2-yr cycle to promote stability for users and to reduce administrative burden.
- ▶ We do not revise our fee methodology regulation unless there are significant changes to the formula or significant new program costs to be offset by fees.
  - ▶ We would look to Advisory Board for recommendations on enhancements and impacts on costs/fees.
- ▶ The proposed fee methodology includes two fee adjusters to address areas of vulnerability:
  1. **Inflation** adjuster, based on CPI, adjusts fees between 1<sup>st</sup> and 2<sup>nd</sup> yrs.
  2. **Revenue recapture** adjuster recovers revenue lost from previous fee cycle because of imprecise manifest estimates or uncollectable fees.
    - ▶ Shifts in manifest usage or errors in initial projections could destabilize revenue collections.
    - ▶ “Uncollectable” fees are those not paid by the TSDFs after collection activities suspended.

## 6. Sanctions for Non-Payment

- ▶ The draft NPR proposes a 4-tier set of ratcheting sanctions:
  1. Interest charged at Combined Value of Funds Rate for fees that are 30 days past due,
    - ▶ Interest sanction prescribed under Federal claims collection statute
  2. Financial penalty of 6% per yr on fees that are >90 days past due,
    - ▶ Penalty is prescribed under Federal claims collection statute.
  3. Publication of Delinquent Payors List for fees >120 days past due, and
  4. RCRA compliance orders for manifests not fully complete because fees unpaid.
    - ▶ Could result in compliance order for civil penalty or injunctive order to pay overdue fees.
    - ▶ These orders would be a matter of EPA's enforcement discretion.
- ▶ NPR also solicits comment on “Denial of e-Manifest Services” sanction.
  - ▶ Could cut off access to electronic manifests, paper processing, or both.
  - ▶ Unsure what degree of delinquency is so egregious to warrant this sanction.
  - ▶ Concern that cutting off access would prevent EPA from collecting compliance data.

# Other Non-Fee Issues in the NPR

- ▶ **Transporter regulation: Allow addition or substitution of HW transporter on manifest, while shipment *en route*.**
  - ▶ Change can be justified by emergency or by transporter efficiency.
  - ▶ Change executed by generator consult or by contract designating agent to make changes.
- ▶ **Facility regulation: Specifies how TSDFs can correct manifest data within 90-day period after waste receipts.**
  - ▶ Changes must be submitted electronically, either online or by batch submission.
  - ▶ Changes must be certified accurate and complete by TSDF.
- ▶ **Generator regulation: Allow some “mixed” electronic/paper manifests.**
  - ▶ Would amend One Year Rule provision that banned all mixed manifests (complexity).
  - ▶ NPR would allow generators to sign and retain a paper copy, while others submit electronically.
  - ▶ Viewed as means to avoid vexing and intractable generator implementation challenges.
- ▶ **Request for comment:** Should TSDFs be restricted to submitting paper manifest data to EPA by digital means only (i.e., no snail mail)?

# Regulatory Impact Analysis

- ▶ Annualized cost savings of \$34 million
  - ▶ System achieves cost savings in year three.
  - ▶ Cost savings increase through year six and then level out.
- ▶ Comparison of RIA and prior \$75 million cost savings estimates
  - ▶ Estimates have different scope.
    - ▶ \$75 million estimate is a measure of burden reduction in a single year.
    - ▶ \$34 million RIA estimate incorporates annual burden reductions, annual system costs, and discounting of burden reductions and costs over six years.
  - ▶ More accurate to compare \$75 million estimate with RIA annual cost savings from year six as they have the same scope.
    - ▶ RIA estimates net annual cost savings in year six of approximately \$100 million.
    - ▶ \$75 million estimate approximately \$83 million when inflated to 2014<sup>16</sup>\$ to be consistent with RIA.



# **Submitting Comments on the e-Manifest User Fee Proposed Rule**

# Notice and Comment Process

- ▶ Typically, EPA issues a lengthy FR notice, opens a relatively short comment period, and then accepts comments via fax, email, postal mail, hand delivery, and electronically through regulations.gov.
- ▶ Two main issues with the current process:
  - ▶ Rules in their current format (PDF from the FR) are not easy to digest in a short amount of time
  - ▶ EPA received approximately 7 million sets of comments last year, all of which are sorted manually at significant cost.
- ▶ With this proposed rule, we have a few new projects:
  - ▶ We are piloting a comment platform (<https://epa-notice.usa.gov>)
  - ▶ If the pilot platform is not used, we are requesting comment submission through traditional methods to include specific comment headings.

PLEASE NOTE: email and fax submissions are no longer available for OLEM actions.

# Comment Platform with GSA's 18F

- ▶ EPA partnered with the General Services Administration's 18F (<https://18f.gsa.gov/>) to develop and pilot a comment platform.
- ▶ The new platform is designed to assist readers in understanding the rule and proposed regulatory changes, as well as to assist EPA in collecting structured comments.
- ▶ Commenters who use the pilot platform to submit comments do not need to submit duplicative comments through another method (e.g., Regulations.gov or postal mail)

# Comment Platform - Preamble

- ▶ After opening the pilot site, the user will click the link to read and comment on the rule, which directs the users to the rule preamble (under the 'Pre' tab).
- ▶ The rule is parsed by section and contains a table of contents (on the left) for easy navigation through the rule.

The screenshot displays the eRegulations web interface. At the top, there's a navigation bar with 'Pre', 'CFR', a search icon, and a back arrow. The current page is titled 'Intro: Preamble introduction'. On the right, there are action buttons: 'Read the proposal' and 'Write a comment'. Below the navigation bar is a 'TABLE OF CONTENTS' sidebar on the left, listing sections like 'Preamble introduction', 'I. General Information', and 'Submitting comments'. The main content area shows the title 'ENVIRONMENTAL PROTECTION AGENCY' and the rule title 'Hazardous Waste Management System; User Fees for the Electronic Hazardous Waste Manifest System and Amendments to Manifest Regulations'. A green box indicates 'Comment period closes on ... Rule published TBD'. There is also a link to 'View supporting documents from the docket'. At the bottom, the rule is identified as '40 CFR Parts 262, 263, 264, 265, 271 EPA-HQ-2050-AG80'.

# Comment Platform – CFR Section

- ▶ The Code of Federal Regulations (CFR) section also contains a table of contents on the left.
- ▶ Each proposed reg change is displayed in green addition and strikeout.

eRegulations |

Pre CFR Q < § 262.24 Actions: [Read the proposal](#) [Write a comment](#)

<b>TABLE OF CONTENTS</b> Amendments To The CFR	2. Section 262.24 is amended by revising paragraphs (c) and (g) to read as follows:  <b>§ 262.24 Use of the electronic manifest.</b>
40 CFR 262	
Authority	
§ 262.24 Use of the electronic manifest.	<p style="text-align: center;">★ ★ ★ <a href="#">Show more context</a> ★ ★ ★</p>
40 CFR 263	<p style="text-align: center;">★ ★ ★ <a href="#">Show more context</a> ★ ★ ★</p>
Authority	
§ 263.20 The manifest system.	
§ 263.21 Compliance with the manifest.	
40 CFR 264	<p><b>c. <i>Restriction on use of electronic manifests.</i></b></p> <p>A generator may <del>prepare</del><b>use</b> an electronic manifest for the tracking of waste shipments involving any RCRA hazardous waste <del>shipments involving any RCRA hazardous</del><b>only if it is known at the time the manifest is originated that all waste only if it is known at handlers named on the timemanifest participate in the manifest is originated that all waste handlers named onuse of the manifest participate in the electronic manifest system.manifest, except that:</b></p>
Authority	
§ 264.71 Use of manifest system.	<p><b>1. A generator may sign by hand and retain a paper copy of the manifest signed by hand by the initial transporter, in lieu of executing the generator copy electronically, thereby enabling the transporter and subsequent waste handlers to</b></p>
§ 264.1300 Applicability.	

[Write a comment about § 262.24\(c\)](#)

[Write a comment about § 262.24\(c\)\(1\)](#)

# Comment Platform – Comment by Section

- ▶ Every section in the rule preamble and CFR section contains a link (on the right), which allows the reader to comment on that section.

The screenshot shows the eRegulations website interface. At the top left, the logo "eRegulations" is visible. Below it, there are navigation tabs for "Pre", "CFR", and a search icon. The main content area is titled "Section III.F.6" and contains the following text:

month. Any deviation between projected and actual usage and fees would be addressed by the reconciliation process at the end of the year, resulting in an electronic bill for the amount owed or a credit.

**6. REQUEST FOR COMMENT.**

EPA requests comment on the proposed monthly invoicing approach and the alternative options (If submitting comments on this issue, please use comment header: 12 – Payment Options). Do commenters agree that a monthly invoicing approach based on actual manifest usage is preferred to the other options, even though it may entail additional administrative effort and cost to implement? If there are concerns with the proposed approach, what are those concerns, and what payment option(s) would commenters prefer to the proposed approach?

With respect to the advance monthly fixed payment option, EPA requests comments on the perceived advantages and drawbacks of this option. Is there sufficient attractiveness to users in being able to make a nearly automatic monthly payment rather than having to respond to an invoice? Are the TSDf receiving facilities able and willing to authorize automatic ACH debits, e.g., on the 1st of each month, from their commercial bank accounts to cover a fixed, monthly e-Manifest fee

On the right side of the page, there are two action buttons: "Read the proposal" and "Write a comment". A red circle highlights a link that says "Write a comment about Section III.F.6".

On the left side, there is a "TABLE OF CONTENTS" section with a list of items:

- Preamble
- 1. Background
- 2. Payment Collection Options Under Consideration
- 3. What methods of payment will be accepted?
- 4. Analysis of Payment Collection Options
- 5. What is EPA proposing for its fee collection methods?
- 6. Request for Comment.
- G. How will EPA Address User Fee Disputes?
- H. How Does the Proposed Rule Address Fee Sanctions?
- 1. Background

# Comment Platform – Drafting Comments

- ▶ After selecting a section, comments are drafted in the text field. Document upload is also available, if needed.
- ▶ The 'Review and Submit' button will navigate you through the remainder of the process, where you'll have an opportunity to edit your comments prior to submitting.

The screenshot displays the eRegulations interface for drafting a comment. On the left is a 'TABLE OF CONTENTS' with a list of sections from 'Preamble' to 'H. How Does the Proposed Rule Address Fee Sanctions?'. The main content area is titled 'Section III' and shows 'You are writing about Section III.F.6. Request for Comment.' Below this is a text field with a red circle around the text 'This is my comment on monthly invoicing.' To the right, under 'Your Comment', it says 'You have 1 response pending.' and shows a 'Section III.F.6' button with a 'Review and Submit' button below it. At the bottom, there are buttons for 'Upload Attachment', 'Delete response', and 'Save Response', with a confirmation message 'Your comment was saved.' and a note about attachment limits.

**eRegulations** |

Pre CFR Q < Section III Actions: Read the proposal Write a comment

**TABLE OF CONTENTS**  
Preamble

1. Background
2. Payment Collection Options Under Consideration
3. What methods of payment will be accepted?
4. Analysis of Payment Collection Options
5. What is EPA proposing for its fee collection methods?
6. Request for Comment.
- G. How will EPA Address User Fee Disputes?
- H. How Does the Proposed Rule Address Fee Sanctions?

**You are writing about Section III.F.6. Request for Comment.**

+ Show: Preamble | Section III.F.6

**Write your response to Section III.F.6. Request for Comment.**

B I Heading Horizontal rule

This is my comment on monthly invoicing.

**Your Comment**  
You have 1 response pending.

Section III.F.6

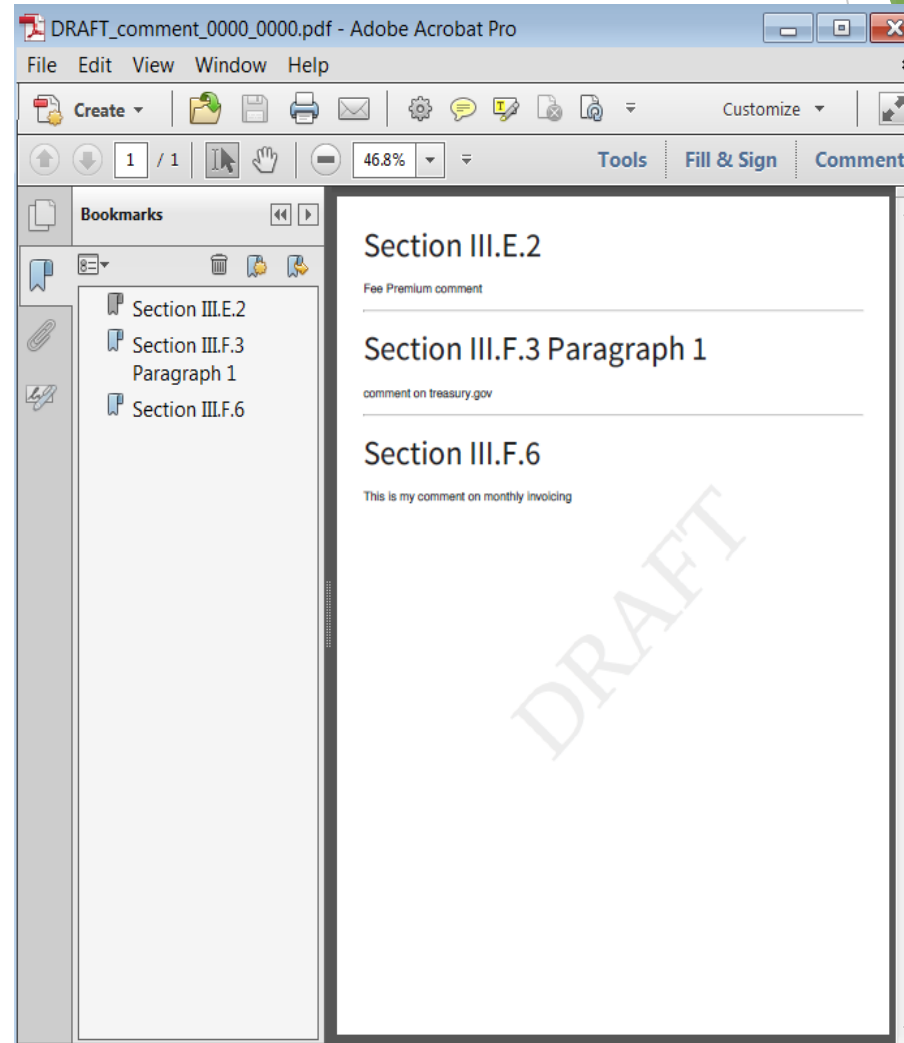
Review and Submit

Upload Attachment ← Delete response Save Response ←

You've uploaded 0 total attachments. Limit: 9 total attachments. Your comment was saved.

# Comment Platform – PDF

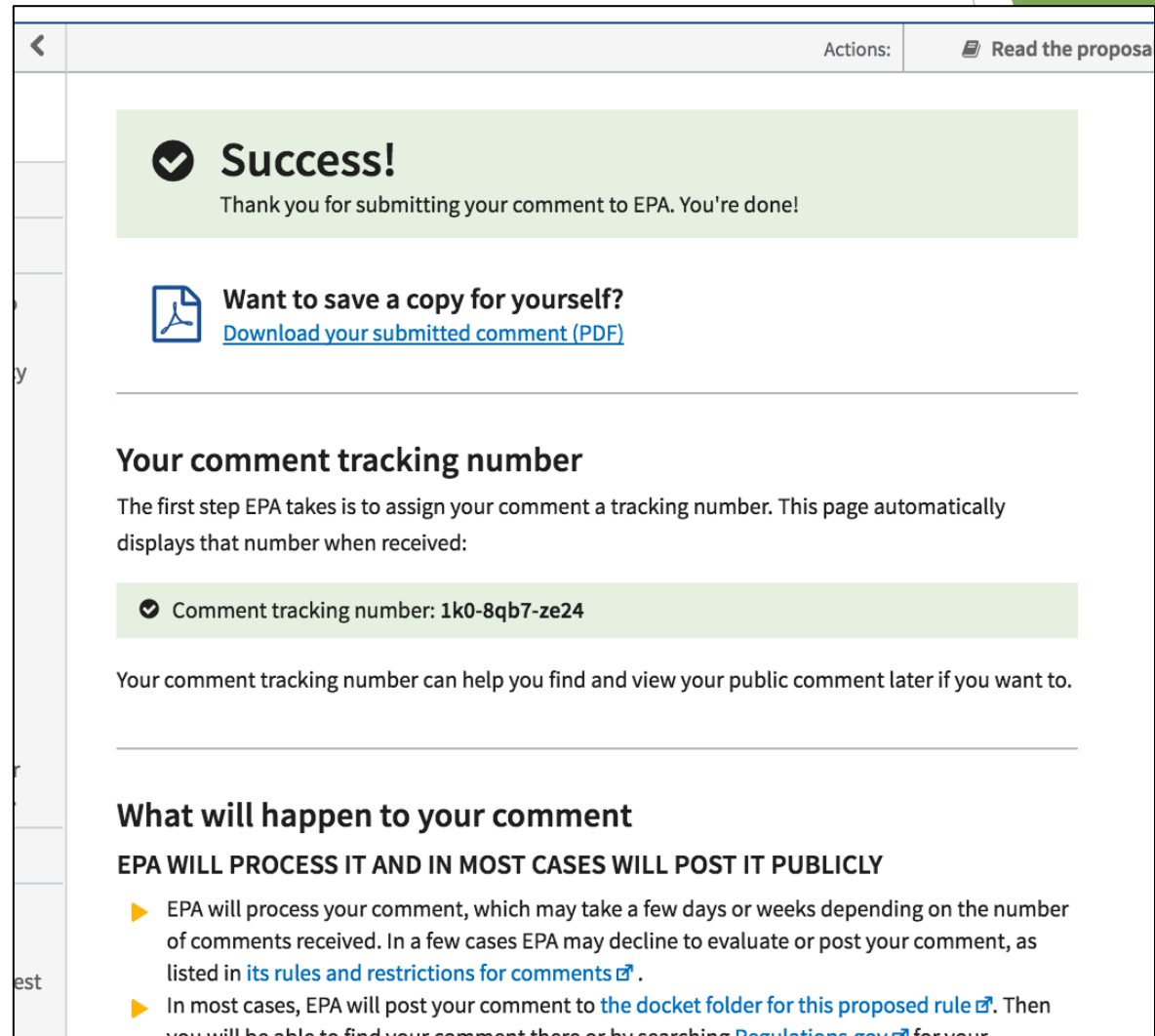
- ▶ The platform will generate a PDF based on your comments, which is what will be submitted to the official docket.
- ▶ This screen capture shows an example of the summary of draft comments prior to submitting. Note the 'DRAFT' watermark. After you officially submit, you will have an opportunity to save a PDF of your official comments (without the watermark).







# Comment Platform – Success Page


- ▶ After submitting comments, you should see this screen with your unique tracking number and the link to download your submitted comments.
- ▶ Submitted comments go directly to the Federal Docket Management System (FDMS), at which time the EPA docket center will process your comments and publically post on regulations.gov. As with any comment submission, there is some lag time between the time of comment submission and the time of posting on regulations.gov.



The screenshot shows a mobile application interface for the EPA Comment Platform. At the top, there is a navigation bar with a back arrow on the left and an 'Actions:' menu on the right containing a document icon and the text 'Read the proposal'. The main content area features a green success banner with a checkmark icon, the word 'Success!', and the message 'Thank you for submitting your comment to EPA. You're done!'. Below this is a section titled 'Want to save a copy for yourself?' with a PDF icon and a blue link: 'Download your submitted comment (PDF)'. A horizontal line separates this from the 'Your comment tracking number' section, which explains that EPA assigns a tracking number and displays it upon receipt. A green box highlights the tracking number: '1k0-8qb7-ze24'. Below this, it states that the tracking number can be used to find and view the public comment later. Another horizontal line leads to the 'What will happen to your comment' section, which states 'EPA WILL PROCESS IT AND IN MOST CASES WILL POST IT PUBLICLY'. This section contains two bullet points: the first explains that EPA will process the comment, which may take days or weeks, and that in some cases EPA may decline to evaluate or post the comment, with a link to 'its rules and restrictions for comments'; the second explains that in most cases, EPA will post the comment to 'the docket folder for this proposed rule' and that users can find their comment there or by searching 'Regulations.gov'.


Actions:  Read the proposal

 **Success!**  
Thank you for submitting your comment to EPA. You're done!

 **Want to save a copy for yourself?**  
[Download your submitted comment \(PDF\)](#)

---

**Your comment tracking number**  
The first step EPA takes is to assign your comment a tracking number. This page automatically displays that number when received:

 Comment tracking number: 1k0-8qb7-ze24

Your comment tracking number can help you find and view your public comment later if you want to.

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**What will happen to your comment**  
**EPA WILL PROCESS IT AND IN MOST CASES WILL POST IT PUBLICLY**

- ▶ EPA will process your comment, which may take a few days or weeks depending on the number of comments received. In a few cases EPA may decline to evaluate or post your comment, as listed in [its rules and restrictions for comments](#).
- ▶ In most cases, EPA will post your comment to [the docket folder for this proposed rule](#). Then you will be able to find your comment there or by searching [Regulations.gov](#) for your

# Use of Comment Headings +

- ▶ For comments not submitted through the pilot comment platform, and instead submitted via postal mail or Regulations.gov, EPA is requesting commenters to link their comments on specific issues to topic areas by using a comment heading (and associated number).
  - ▶ The list of comment headings is specified in section I.E.2 of the proposed rule.
  - ▶ There are a total of 23 comment headers, each specifying an issue for which EPA is soliciting comment (except for the general 'OTHER' comment heading).
  - ▶ This is what we are hoping for when you submit your comments

## 1. Data Access Services

*Your comment here...*

## 2. Billable Event; 3. Fee Methodology

*Your comment here...*

## Benefits to the Commenter

- ▶ Use of comment headings will ensure that EPA doesn't misinterpret your comments as pertaining to a different issue. This will also help EPA sort comments and more quickly respond to comments.
- ▶ With the intent of making the rule easier to navigate, in the list of comment headings, we've included the section numbers in the rule on where to find more information on each issue.

# Feedback

- ▶ Your feedback on both methods will influence how EPA proceeds with collecting comments.
- ▶ Send feedback:
  - ▶ Two places to submit feedback on the pilot comment site: (1) on the homepage, and (2) on the submit success page
  - ▶ Contact me directly via email ([noggle.william@epa.gov](mailto:noggle.william@epa.gov)) or phone (202-566-1306)
- ▶ Also, 18F is looking for volunteers to interview and to possibly shadow when a commenter is submitting comments. If you would like to volunteer, please contact me or Jen Ehlers ([Jennifer.ehlers@gsa.gov](mailto:Jennifer.ehlers@gsa.gov)).

# Resources

- ▶ Pilot site: <https://epa-notice.usa.gov>
- ▶ e-Manifest proposed rule website:  
<https://www.epa.gov/hw/proposed-rule-user-fees-electronic-hazardous-waste-manifest-system-e-manifest-and-amendments>.
  - ▶ Quick Guide
  - ▶ FAQs
- ▶ If you've registered on this webinar with your email, you'll be receiving an email from me in the coming weeks with more details on the pilot.
- ▶ Feel free to contact me... [noggle.william@epa.gov](mailto:noggle.william@epa.gov), 202-566-1306.

# e-Manifest System Development Update

# System Development Update +

- ▶ Using lean start-up product development strategies with agile, user-centered software design/development methodologies i.e.
  - ▶ Modular development practices – building individual working pieces of the system and integrating it into the whole
  - ▶ Address uncertainties from architecture planning work, and engage early with users and stakeholders.
  - ▶ Bring down the cost of current and future development by addressing risk upfront and insuring that the work being completed brings actual value to stakeholders and users.
  - ▶ Continuous improvement, using iterative processes, and regular engagement with users and stakeholders throughout the life of the program.
- ▶ User-centered design/development is underway.
  - ▶ Small scale demonstration phase.
  - ▶ Open source code and project progress engages industry/state users in the early phases of development, and creation of development platform and hosting environment.
  - ▶ Will expand to all/every user type over time (e.g. states with no systems, large and small generators etc. etc.)

# System Development Update +

- ▶ Major Milestones of our most recent release
  - ▶ TSDF receiving staff can upload test manifest data as received and electronically sign it using a CROMERR electronic signature (Password and second factor or digitized handwritten stylus/pen signature).
  - ▶ TSDF users can electronically update previously submitted manifest records.
  - ▶ TSDF users can upload a scan of a manifest for data entry.
  - ▶ Provides initial data access and reporting tools to the user community.
  - ▶ Electronic and Paper Manifests for a site will be accessible to authorized users.

# System Development Update

- ▶ Summer of 2016 through winter of 2016/2017 – rolling iterative releases/testing of system
  - ▶ Develop data analytics dashboard ensuring all of our users are using EPA's API and providing substantive feedback on development
  - ▶ Finalize System Security planning/certification
  - ▶ Determine where EPA will host e-Manifest
  - ▶ Front end redesign
- ▶ Continue user outreach - engage waste generators and continue to work with TSDFs to ensure they are using EPA API services



# System Development Update

- ▶ Software development progress
  - ▶ Our demonstration site: <https://e-manifest.cld.epa.gov/>
  - ▶ Trello board: <https://trello.com/b/0geMlbgF/epa-emanifest>
  - ▶ GitHub: <https://github.com/18F/e-manifest>
- ▶ Direct Communications
  - ▶ Biweekly Sprint delivery demonstrations
  - ▶ Email account: [eManifest@epa.gov](mailto:eManifest@epa.gov)
  - ▶ To subscribe to the general e-Manifest ListServ: [eManifest-subscribe@lists.epa.gov](mailto:eManifest-subscribe@lists.epa.gov)
  - ▶ To subscribe to the development-focused e-Manifest ListServ: [e-ManifestDev-subscribe@lists.epa.gov](mailto:e-ManifestDev-subscribe@lists.epa.gov).

# e-Manifest Advisory Board Update

# e-Manifest Advisory Board Update +

- ▶ e-Manifest Advisory Board was established under the e-Manifest Act.
- ▶ Role is to provide recommendations to EPA on matters related to the development and operation of the e-Manifest system.
- ▶ The e-Manifest Board is composed of:
  - ▶ 3 members who represent users of the manifest system for the tracking and transportation of hazardous waste.
  - ▶ 3 members as states representatives responsible for processing e-Manifests.
  - ▶ 2 members who are experts in information technology.
- ▶ The newly selected e-Manifest Advisory Board Designated Federal Officer (DFO) is Fred Jenkins.
- ▶ Barnes Johnson, ORCR Director, to be designated as the Chair of the e-Manifest Board.
- ▶ Taking steps to prepare for the first public meeting in 2016.

# For more information about e-Manifest please visit our:

- ▶ EPA e-Manifest website:

- ▶ <https://www.epa.gov/hwgenerators/hazardous-waste-electronic-manifest-system-e-manifest>

- ▶ e-Manifest List Serv:

- ▶ Subscribe: Send a blank message to: [eManifest-subscribe@lists.epa.gov](mailto:eManifest-subscribe@lists.epa.gov)

- ▶ Contribute to the list: Send a message to [eManifest@list.epa.gov](mailto:eManifest@list.epa.gov)

- ▶ Twitter @epaland

- ▶ <https://twitter.com/epaland?lang=en>

# Questions?