e-Manifest Data Quality

NEWMOA

February 8, 2022

Agenda

- Program Update
- Data Quality
    - Observed issues
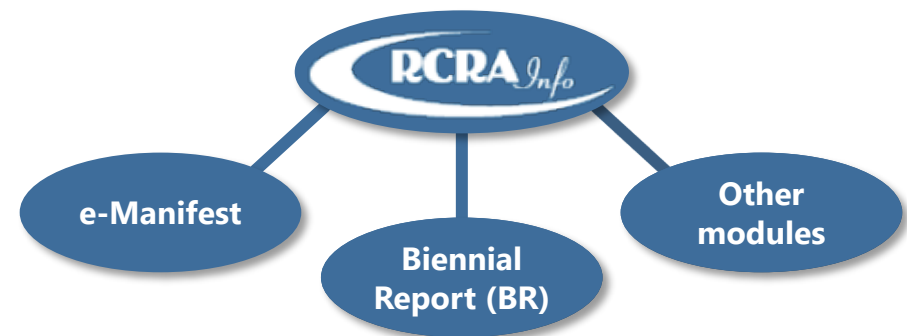   - Current work
- Conclusion
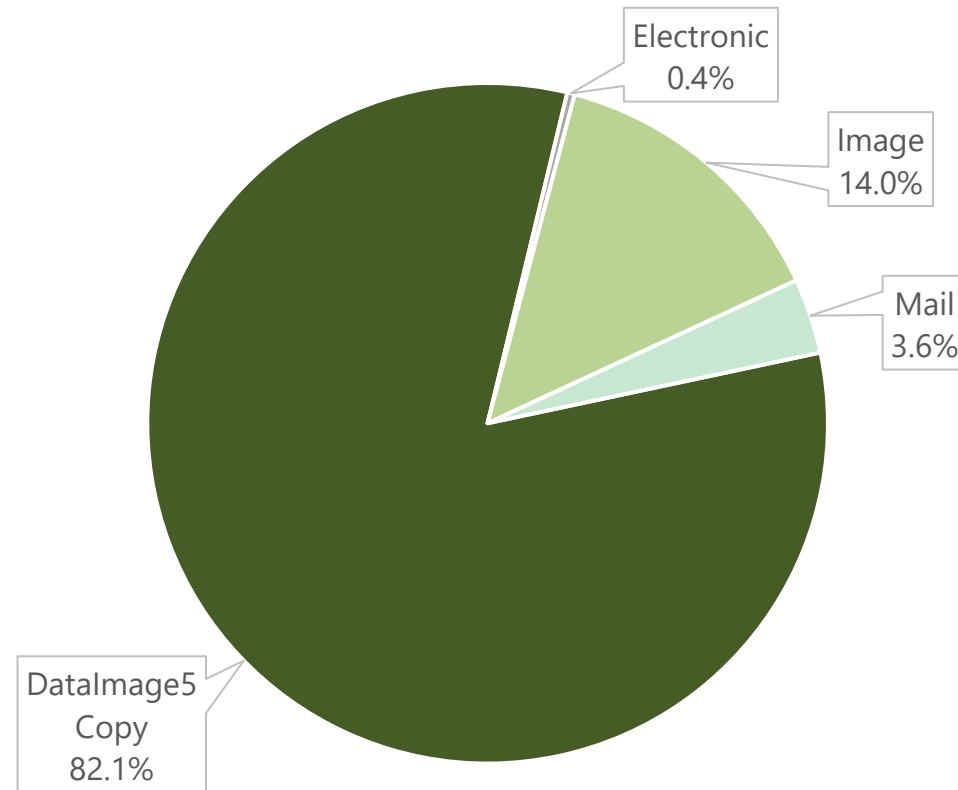   - Q&A

Program Updates

e-Manifest 101

- e-Manifest is...

  1. A modernized, electronic, national system for tracking hazardous waste shipments

  2. A one-stop hub for the reporting and recordkeeping of the uniform hazardous waste manifest data (and more)

  3. A module in EPA's RCRAInfo web application (https://rcrainfo.epa.gov)

- All manifests that accompany federal or state regulated HW shipments are submitted to the e-Manifest system
  - Including paper

All Time Submission Summary

- Submitted manifests: 6.37M

- Submission breakdown:

  - Data + Image: 5,231,281

  - Image Only: 890,601

  - Mail: 227,206

  - Electronic: 22,798

As of 01/24/2022

Upcoming Third Rule

- EPA is expecting to publish a proposed rule ("third rule") that would propose regulatory changes to:
  - Incorporate hazardous waste export manifests and other manifest-related reports into the e-Manifest system
  - Revise the manifest form so that manifest data for import and export shipments can be recorded more clearly on them
  - Revise the export and import shipment movement document-related requirements to more closely link the manifest data with the movement document data
  - Make technical and conforming revisions, including changes related to PCB regulations under TSCA
- We expect the rule to be published for public comment in February 2022.

December 2021 Bulletin

- Check out our most recent communications bulletin!

- It covers our public meetings, Advisory Board nominations, updated e-Manifest functionality, and more.

- www.epa.gov/system/files/documents/2021-12/e-manifest-bulletin-december-2021.pdf

Common Issues

The following is a non-comprehensive list of paper manifest data quality errors EPA has observed in e-Manifest

Handler ID

- EPA has observed hundreds of thousands of paper manifests submitted to the e-Manifest system with generator and transporter ID numbers that are…

- Left Blank/Invalid on either the…
  - paper manifest
  - Digital copy
  - Or both

- Or submitted as something such as "VSQG"…
  - In digital format while the paper manifest had an EPA ID number
  - In paper and digital even though the generator has obtained an EPA ID number

MTN Mismatch

- EPA estimates found that approximately 5% of manifests submitted as Data + Image submissions contained image files with manifest tracking numbers (MTN) within the image file that did not match the MTN in the data file.

- This impedes other facilities from uploading manifests with their correct numbers, and requires manual intervention by the e-Manifest team

Manifest from Non-registered Printers

- In Spring 2021, EPA observed an instance where thousands of manifests printed by a non-approved printer put into circulation
    - EPA did issue its first e-Manifest related Notice of Violation (NOV)
    - May have been happening before e-Manifest launched, we just didn't know
    - Requires dozens of hours from EPA, Industry and states to fix
        - Submitting these is a manually intensive process

- We still see manifests with similar issues pop up, but on a smaller scale

Misuse of Electronic Manifest

- EPA has observed a few isolated instances of hazardous waste handlers misusing the electronic manifests

- Handler are

  - Initiating ELC manifest

  - Printing and using the ELC as a paper manifest

  - The initiated manifest remains unsigned in the system

Digitization Errors

- The catch all for stochastic digitization errors that occur while processing paper manifests

9-13. Waste Information

Waste Characteristics (Total lines: 2)

Line Number	HM	U.S. DOT Description	Containers	Type	Total Quantity	Uts	Waste Codes	Management Method Code	Action
1	X	UN1993, Waste flammable liquids, n.o.s., (Xylene, Toluene), 3, II, RQ(100LBS)	13	TP	3900	M	D001, F003, F005	H061	👁
2	X	UN1993, Waste flammable liquids, n.o.s., (Xylene, Toluene), 3, II, RQ(100LBS)	16	DM	880	G	D001, F003, F005	H061	👁

9a HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes		
		No.	Type					
X	1 UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S.,3,PGII, (XYLENE,TOLUENE) RQ=100LBS ERG#128	13	TP	3900	G	D001	F003	F005
X	2 UN-1993, WASTE, FLAMMABLE, LIQUID, NOS 3 PG II (XYLENE TOLUENE RQ=100 LBS (ERG-128)	16	DM	880	G	D001	F003	F005

Current Work

Long-term work with OECA

- e-Manifest is currently collaborating with EPA's Office of Enforcement and Compliance (OECA)
  - This work represents a phased approach to potential future e-Manifest...
    - Compliance assistance
    - Enforcement where necessary

Paper Processing Center Corrections

- e-Manifest team is currently evaluating a pilot program that uses the EPA Paper Processing Center (PPC) to make corrections to Data + Image manifests

  - Currently limited in scope to…

    - Certain fields (namely the generator ID)

    - A limited number of manifests (while we pilot this program)

    - Manifests that do not have previous corrections submitted (will not be overwriting your corrections)

Security Updates

- RCRAInfo will be implementing additional security measures over the coming year

  - The [Executive Order on Improving the Nation's Cybersecurity](), signed in 2021, requires federal agencies to implement multi-factor authentication to protect their data.

  - This means we will have to require two-factor authentication to gain access to RCRAInfo.

  - We don't know yet how we will implement this requirement, but we wanted to let you know it's coming. We will keep you informed.

WIETS

- WIETS module added to the RCRAInfo industry application as of Jan 2022

- We are still working on making this data more accessible later in 2022, and eventually that will resent additional data exploration opportunities with import manifests, including data received from Customs on cross border shipments

Contact Info and Useful Links

- Subscribe to our low-volume listservs

  - eManifest-subscribe@lists.epa.gov for general program updates

  - e-manifestdev-subscribe@lists.epa.gov developer only updates

- e-Manifest Program website: https://www.epa.gov/e-Manifest

  - FAQs: https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest

  - Webinars: https://www.epa.gov/e-manifest/monthly-webinars-about-hazardous-waste-electronic-manifest-e-manifest

- GitHub Repository: https://github.com/USEPA/e-manifest

- Access to Metabase: Open to all RCRAInfo users, email muir.Christopher@epa.gov if you do not have an account.

Q & A

- Please enter any questions into the chat