

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: Announcement of Automation Pilot Tests for the Hazardous Waste Manifest

FROM: Elizabeth Cotsworth, Acting Director Office of Solid Waste

TO: Prospective Pilot Participants

I am pleased to announce that the Office of Solid Waste (OSW) will be sponsoring several pilot tests in Fiscal Year 1997 aimed at demonstrating the feasibility of automating the hazardous waste manifest. This letter has been sent to you because you have been identified as a facility that may have an interest in participating in the pilot tests. However, I wanted to share some additional information with you about these pilots, so that your company will understand better what we are trying to accomplish by conducting these tests, and what we would expect from industry participants.

As you know, the hazardous waste manifest is a centerpiece of the "cradle-to-grave" management requirements that apply to hazardous wastes regulated under Subtitle C of the Resource Conservation and Recovery Act (RCRA). Over the years, the manifest has played a pivotal role in assuring that RCRA hazardous wastes are in fact transported to proper management facilities. Also, many States have relied upon the manifest as a source of waste management data for program planning and other purposes.

A Workgroup is now in place at EPA to develop regulatory revisions that would make the manifest system more effective and less burdensome to industry and the States. The analyses completed to date suggest that automating the manifest system may provide considerable benefits insofar as tracking shipments more effectively and reducing the paperwork burdens of the current system. However, before we can develop regulatory options and automation standards, we need to test the feasibility of several approaches to automated manifesting.

During FY 1997, we plan to conduct two distinct pilot tests with the manifest: (1) a "standards-based" approach using Electronic Data Interchange (EDI) formats to track waste shipments among waste handlers and to submit copies to States; and (2) a

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"smart form" test that will allow facilities to complete manifests and transmit them to recipients on the Internet. The first set of tests (the EDI tests) is aimed at larger generators and TSDFs who may already have or will soon have EDI capabilities. The EDI tests are now being organized jointly by members of my staff and by staff in the States of Illinois, Indiana, and Minnesota. The second set of tests (the Internet tests) will be organized and conducted a little later in the fiscal year. We have identified the following objectives for these pilot tests:

- To demonstrate the feasibility of using electronic commerce for inter-company waste tracking transactions among waste handlers, so that manifest events (change of custody and acknowledgment of delivery) may be established and recorded electronically, rather than by physically moving, signing, filing and mailing paper manifest copies.
- To demonstrate that enabling a range of electronic commerce methods can make it possible to automate a significant proportion of the manifests currently initiated and processed manually, by providing automation options for large and small facilities.
- To demonstrate the "user-friendliness" and security of different approaches to automated manifesting and identify where standards should be developed.
- To demonstrate that encryption and "trusted party" certification methods unique to "digital signatures" may be feasibly incorporated into transactions involving the hazardous waste manifest.
- To demonstrate the cost savings that will be realized by moving from a manual to an automated system, considering the tracking, recordkeeping, and reporting requirements.
- To demonstrate the feasibility of integrating the automation and security needs of waste handlers with the reporting needs of RCRA authorized States.

We are planning to hold the organizational meeting for the EDI pilot tests in Chicago on March 20 - 21, 1997. The meeting will be held in the Lake Erie Room of the Great Lakes Conference Center, on the 12th Floor at EPA's Region V facility, located in downtown Chicago at 77 West Jackson Boulevard. We will use the organizational meeting to discuss the design of the EDI tests, the manifest data flow that will be emulated in the tests, the roles of the various participants, and the steps and schedules for conducting and evaluating the tests.

In considering this invitation to participate in the pilot tests, we ask you to keep these points in mind:

- We are focusing the EDI tests initially on generators and facilities in Illinois, Indiana, or Minnesota that are already (or nearly) EDI capable, and that initiate or receive significant numbers of manifests (10 or more per month). If the test concepts prove to be sound, we may be able to expand the pilot to additional facilities at a later phase in the tests.
- In sponsoring the tests, we are also committing substantial extramural funds to the design, implementation, and evaluation of the tests. We will make available some technical support for configuring equipment and networks (we are not distributing equipment), for training personnel in the operation of the equipment and software, and for general troubleshooting. Our technical support is not infinite, however, and we expect that participating companies will be willing to dedicate their own time and some staff resources to planning, conducting and monitoring the tests. Past experience suggests that companies can expect to commit about 10 - 16 hours of staff resources/month during the period of the tests.
- Participating companies should be willing to dedicate to the tests a "486" or faster PC, with a minimum of 80 megabytes of free hard disk space, 8 megabytes of RAM, a 14.4 kb/s or faster fax modem, and staff experienced in the Windows TM operating environment.
- Since this is a pilot test, and not a substitute for the current manifest system, participating companies will be expected to operate both the electronic and manual manifest systems during the period of the tests. Participants should understand fully that the normal paper manifest copies must be prepared, signed, transmitted, and maintained as records as specified under current State and Federal regulations. For purposes of RCRA compliance, only the paper manifest copies will have legal significance.
- Industry participants will be expected to participate in the two-day organizational meeting on March 20 - 21, in Chicago.

We certainly welcome the participation of willing members of the regulated community who wish to assist us in demonstrating the merits of automating the RCRA manifest system. Industry participants will likely bring to these pilots many innovative ideas and valuable insights which will help us in working through the technical and policy issues that will arise during the pilots. Thus, our industry partners in these tests can expect to play a role in shaping the direction of and standards for the future manifest system.

Thank you for your consideration of this announcement of our manifest automation pilots. If you have questions, please do not hesitate to contact Richard LaShier (703-308-8796), Ann Codrington (703-308-8825), or Matt Leopard in the Office of Policy, Planning, and Evaluation (OPPE) on 202-260-2468.

cc:

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