

# Independent Audit of the EPA's Fiscal Years 2024 and 2023 Hazardous Waste Electronic Manifest System Fund Financial Statements

May 19, 2026 | Report No. 26-F-0032



## Abbreviations

C.F.R.	Code of Federal Regulations
e-Manifest	Hazardous Waste Electronic Manifest
EPA	U.S. Environmental Protection Agency
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
OIG	Office of Inspector General
OMB	Office of Management and Budget
U.S.C.	United States Code

## Cover Image

Truck transporting a shipment of hazardous waste. The EPA collects fees to cover the costs of operating the e-Manifest system, which tracks off-site shipments of hazardous waste from the generator facility to the receiving facility, typically an off-site waste management facility that will store, treat, or dispose of the waste. (U.S. Department of Energy image)

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# At a Glance

## Independent Audit of the EPA's Fiscal Years 2024 and 2023 Hazardous Waste Electronic Manifest System Fund Financial Statements

### Why We Did This Audit

#### To accomplish this objective:

We conducted this audit pursuant to the Hazardous Waste Electronic Manifest Establishment Act. The Act requires the U.S. Environmental Protection Agency to prepare and the Office of Inspector General to audit the accompanying financial statements of the EPA's Hazardous Waste Electronic Manifest System Fund. Our primary objectives were to determine whether the:

- Fund's financial statements were fairly stated in all material respects.
- EPA's internal control over financial reporting was in place.
- EPA's management complied with applicable laws, regulations, contracts, and grant agreements.

The Act also requires the OIG to analyze the fees collected and disbursed, the fee structure, the level of use of the Electronic Manifest system, and the success of the system in operating on a self-sustaining basis.

#### To support this EPA mission-related effort:

- *Operating efficiently and effectively.*

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[List of OIG reports.](#)

### The EPA Receives an Unmodified Opinion for Fiscal Years 2024 and 2023

We rendered an unmodified opinion on the EPA's fiscal years 2024 and 2023 Hazardous Waste Electronic Manifest System Fund, known as the e-Manifest Fund, financial statements, meaning that the statements were fairly presented and free of material misstatement. We did not identify any matters that we consider to be material weaknesses or significant deficiencies in the fund.

**We found the fund's financial statements to be fairly presented and free of material misstatement.**

### Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements

We did not identify any instances of noncompliance that could result in a material misstatement to the audited financial statements.

### Other Governmental Reporting Requirements

We performed the audit requirements outlined in the Hazardous Waste Electronic Manifest Establishment Act. Specifically, we analyzed the (1) fees collected and disbursed, (2) reasonableness of the fee structure to meet current and projected costs, (3) level of use of the e-Manifest system, and (4) the success of the system in operating on a self-sustaining basis.

The e-Manifest system is a national system designed to track hazardous waste. Manifests are required shipping forms that detail the type and quantity of waste being transported and instructions for handling it. As authorized by the Hazardous Waste Electronic Manifest Establishment Act to support e-Manifest system costs, the EPA charges facilities fees for each manifest they submit. The fees vary based on the type of manifest submitted.

Our analysis did not identify any indication that the fee structure was not reasonable. According to the EPA's data, from the launch of the e-Manifest system in fiscal year 2018 through fiscal year 2024, the Agency billed for more than 10.8 million manifests that were submitted by facilities receiving hazardous waste. Also, based on our analysis, it appears that the EPA has collected sufficient fees for the system to operate on a self-sustaining basis. However, despite the Agency's goal that facilities would submit at least 75 percent of their manifests electronically by 2022, as of September 2024 they had submitted less than 0.5 percent electronically. The EPA intends to conduct outreach activities that will assist with electronic manifest adoption.

This report does not contain any findings or recommendations.



**OFFICE OF INSPECTOR GENERAL**  
U.S. ENVIRONMENTAL PROTECTION AGENCY

May 19, 2026

**MEMORANDUM**

**SUBJECT:** Independent Audit of the EPA's Fiscal Years 2024 and 2023 Hazardous Waste Electronic Manifest System Fund Financial Statements  
Report No. 26-F-0032

**FROM:** Nicole N. Murley, Deputy Inspector General performing the duties  
of the Inspector General *Nicole N. Murley*

**TO:** C. Paige Hanson, Chief Financial Officer and Chief Administrative Officer  
Office of Finance and Administration

Thomas Croci, Acting Assistant Administrator  
Office of Land and Emergency Management

This is our report on the subject audit conducted by the U.S. Environmental Protection Agency Office of Inspector General. The project number for this audit was [OA-FY25-0049](#). Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

A response to this report is not required because the report contains no recommendations. If your office submits a response, however, it will be posted on the OIG's website, along with our memorandum commenting on the response. The response should be provided as an Adobe PDF file that complies with the requirements of section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that your office does not want released to the public; if the response contains such data, your office should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at [www.epa.gov/oig](http://www.epa.gov/oig).

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# Independent Audit of the EPA's Fiscal Years 2024 and 2023 Hazardous Waste Electronic Manifest System Fund Financial Statements

## Report on the Audit of the Financial Statements

### *Opinion*

We have audited the financial statements of the U.S. Environmental Protection Agency's Hazardous Waste Electronic Manifest System Fund, known as the e-Manifest Fund. These statements comprise the following: the consolidated balance sheets as of September 30, 2024 and 2023; the related statements of net cost and changes in net position; the statement of budgetary resources for the years then ended; and the related notes to the financial statements.

In our opinion, the financial statements, including the accompanying notes, present fairly, in all material respects, the assets, liabilities, net position, net cost, changes in net position, and combined budgetary resources of the EPA as of and for the years ended September 30, 2024 and 2023, in conformity with accounting principles generally accepted in the United States of America.

### *Basis for Opinion*

We conducted our audit in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards* issued by the comptroller general of the United States, commonly referred to as generally accepted government auditing standards, or GAGAS; and Office of Management and Budget, or OMB, Bulletin No. 24-02, *Audit Requirements for Federal Financial Statements*, dated July 29, 2024. Our responsibilities under those standards are further described in the "Auditor's Responsibilities for the Audit of the Financial Statements" section of our report. We are required to be independent of the EPA and to meet our ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

### *Responsibilities of Management for the Financial Statements*

The EPA's management is responsible for the preparation and fair presentation of these financial statements in accordance with generally accepted accounting principles. These responsibilities include the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

## ***Auditor's Responsibilities for the Audit of the Financial Statements***

Our objectives are to obtain reasonable assurance that the financial statements, as a whole, are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance; therefore, it is not a guarantee that an audit conducted in accordance with GAGAS and OMB Bulletin No. 24-02 will always detect a material misstatement or a material matter when it exists.

The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements, including omissions, are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAGAS and OMB Bulletin No. 24-02, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit to design audit procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of the EPA's internal control. Accordingly, we express no such opinion.
- Evaluate the appropriateness of accounting policies used, the reasonableness of significant accounting estimates made by management, and the overall presentation of the financial statements.
- Perform other procedures that we consider necessary in the circumstances.

We are also required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identify during the audit.

## ***Other Information***

The EPA's other information in its fiscal year 2024 Agency Financial Report contains a wide range of information, some of which is not directly related to the financial statements. This information is presented for purposes of additional analysis and is not a required part of the financial statements. Management is responsible for the other information included in the EPA's Agency Financial Report. The other information includes a message from the EPA administrator, program performance, and a "Management's Discussion and Analysis" section. Other information does not include the financial

statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information, and we do not express an opinion or any form of assurance thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and consider whether a material inconsistency exists between the other information and the financial statements or whether the other information otherwise appears to be materially misstated. If, based on the work performed, we conclude that an uncorrected material misstatement of the other information exists, we are required to describe it in our report. We did not identify any such uncorrected material misstatements based on the work performed.

## **Report on Internal Control over Financial Reporting**

### ***Results of Our Consideration of Internal Control over Financial Reporting***

In connection with our audit of the fund's financial statements, we considered the EPA's internal control over financial reporting, consistent with the auditor's responsibilities described below.

Our consideration of the internal control over financial reporting was for the limited purpose of expressing an opinion on the fund's financial statements and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies or to express an opinion on the effectiveness of the EPA's internal control over financial reporting. Therefore, such deficiencies in internal control may exist that we did not identify during our audit. A deficiency in internal control over financial reporting exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented or detected and corrected on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control over financial reporting that is less severe than a material weakness yet important enough to merit attention by those charged with governance.

We did not note any matters that we consider to be material weaknesses or significant deficiencies in the e-Manifest Fund.

### ***Basis for Results of Our Consideration of Internal Control over Financial Reporting***

We performed audit procedures related to the EPA's internal control over financial reporting in accordance with GAGAS and OMB audit requirements.

## ***Responsibilities of Management for Internal Control over Financial Reporting***

The EPA's management is responsible for designing, implementing, and maintaining effective internal control over financial reporting relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

## ***Auditor's Responsibilities for Internal Control over Financial Reporting***

In planning and performing our audit of the e-Manifest Fund financial statements as of and for the year ended September 30, 2024, in accordance with GAGAS, we considered the EPA's internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing an opinion on the financial statements and to comply with the OMB's audit requirements, but not to express an opinion on the effectiveness of the EPA's internal control. Accordingly, we do not express an opinion on the effectiveness of the EPA's internal control over financial reporting. We are required to report all deficiencies that are considered to be significant deficiencies or material weaknesses. We did not consider all internal controls relevant to operating objectives, such as those controls relevant to preparing performance information and ensuring efficient operations.

## ***Definition and Inherent Limitations of Internal Control over Financial Reporting***

An entity's internal control over financial reporting is a process effected by those charged with governance or management responsibilities and by other personnel. The objectives of internal control over financial reporting are to provide reasonable assurance of the following: (1) that transactions are properly recorded, processed, and summarized to permit the preparation of financial statements in accordance with generally accepted accounting principles, and that assets are safeguarded against loss from unauthorized acquisition, use, or disposition and (2) that transactions are executed in accordance with provisions of applicable laws, including those governing the use of budget authority, regulations, contracts, and grant agreements, noncompliance with which could have a material effect on the financial statements.

## ***Intended Purpose of Report on Internal Control over Financial Reporting***

Because of inherent limitations, internal control over financial reporting may not prevent or detect and correct misstatements. Also, projections of any assessment of effectiveness to future periods are subject to the risk that controls may become inadequate because of changes in conditions or that the degree of compliance with policies or procedures may deteriorate.

## ***Comparison of the EPA's Federal Managers' Financial Integrity Act Report with Our Consideration of Internal Control***

OMB Bulletin No. 24-02 requires us to compare material weaknesses disclosed during the audit with those material weaknesses identified in the Agency's Federal Managers' Financial Integrity Act of 1982 report that relate to the financial statements. We are also required to identify material weaknesses

disclosed by the audit that were not communicated in the Agency’s report. The Agency’s report is prepared and submitted at the consolidated level, of which the e-Manifest Fund is a component. Accordingly, there are no findings to report at the e-Manifest Fund level.

## **Report on Compliance with Laws, Regulations, Contracts, and Grant Agreements**

### ***Results of Our Tests for Compliance with Laws, Regulations, Contracts, and Grant Agreements***

Our tests for compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements disclosed no instances of noncompliance for FY 2024 that would be reportable under GAGAS. However, the objective of our tests was not to provide an opinion on compliance with laws, regulations, contracts, and grant agreements applicable to the EPA. Accordingly, we do not express such an opinion.

### ***Basis of Results of Our Tests for Compliance with Laws, Regulations, Contracts, and Grant Agreements***

We performed our tests of compliance in accordance with GAGAS.

### ***Responsibilities of Management for Compliance with Laws, Regulations, Contracts, and Grant Agreements***

The EPA’s management is responsible for complying with laws, regulations, contracts, and grant agreements applicable to the Agency and the fund.

### ***Auditor’s Responsibilities for Tests of Compliance with Laws, Regulations, Contracts, and Grant Agreements***

Our responsibilities are to test compliance with selected provisions of laws, regulations, contracts, and grant agreements applicable to the EPA that have a direct effect on the determination of material amounts and disclosures in the fund’s financial statements—including whether the EPA’s financial management systems comply substantially with the requirements of the Federal Financial Management Improvement Act of 1996 section 803(a)—and to perform certain limited procedures. Accordingly, we did not test compliance with all provisions of laws and regulations, contracts, and grant agreements applicable to the EPA. We caution that the limited tests that we did perform may not detect all instances of noncompliance.

### ***Intended Purpose of Report on Compliance with Laws, Regulations, Contracts, and Grant Agreements***

The purpose of this report is solely to describe the scope of our testing of compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements, as well as the results of that testing. The purpose is not to provide an opinion on compliance. This report is an integral part of an

audit performed in accordance with GAGAS in considering compliance. Accordingly, this report on compliance with laws, regulations, contracts, and grant agreements is not suitable for any other purpose.

## Other Governmental Reporting Requirements

### *Specific Audit Requirements of the Hazardous Waste Electronic Manifest Establishment Act*

Pursuant to the Hazardous Waste Electronic Manifest Establishment Act, known as the e-Manifest Act, 42 U.S.C. § 6939g, the EPA launched the e-Manifest system on June 30, 2018. The e-Manifest system is a national system designed to track hazardous waste from the time it leaves the generator facility that produced it until it reaches the receiving facility, typically an off-site waste management facility that stores, treats, or disposes of it. A key component of this tracking system is the Uniform Hazardous Waste Manifest form, more commonly referred to as a manifest. The EPA and the U.S. Department of Transportation require each generator facility that transports hazardous waste to fill out a manifest, which contains information on the type and quantity of waste being transported; the instructions for handling the waste; and, ultimately, the signatures of all parties involved in the generation, transportation, and disposal processes. After the waste reaches its destination, the receiving facility must submit the manifest to the EPA. There are three types of manifests that receiving facilities can submit: electronic, data + image upload, and scanned image upload. Electronic manifests are those that the receiving facilities originate in the e-Manifest system and sign electronically. Data + image upload manifests are those that the receiving facilities submit to the EPA by uploading a data file and the scanned image of the final, signed manifest. Scanned image upload manifests are paper manifests that receiving facilities submit to the EPA by uploading a scanned image of the final, signed manifest.

The e-Manifest Act authorizes the EPA to collect reasonable user fees for all system-related costs, including development and maintenance. To that end, the EPA charges facilities for each manifest that they submit. The EPA's fee structure establishes fees for each type of manifest submitted.

The e-Manifest Act requires the Office of Inspector General to annually perform an analysis of the (1) fees collected and disbursed, (2) reasonableness of the fee structure in place as of the date of the audit to meet current and projected costs of the system, (3) level of use of the system by users, and (4) success of the system in operating on a self-sustaining basis and improving the efficiency of tracking waste shipments and transmitting waste shipment data. The following subsections detail the results of our analysis.

### Fees Collected and Disbursed

The EPA began collecting e-Manifest user fees in August 2018. As the e-Manifest Act requires, the EPA deposited the collected fees into the e-Manifest Fund. The Consolidated Appropriations Act, 2024, did not provide appropriations to the EPA for the operation, maintenance, and upgrade of the e-Manifest system. Therefore, the EPA relied on the fees collected and carryovers from prior appropriations to

manage the e-Manifest Program during FY 2024. In FY 2024, the EPA collected approximately \$23.3 million in fees,<sup>1</sup> and it disbursed approximately \$13.8 million. The majority of the disbursements were related to contracts, intragovernmental agreements, and payroll expenses.

### Reasonableness of the Fee Structure to Meet Current and Projected Costs

The EPA calculates its manifest fee structure based on the marginal labor cost of processing each manifest type. Pursuant to 40 C.F.R. § 265.1313(a), the EPA must revise the e-Manifest user fees at two-year intervals by using the applicable fee calculation formula, the most recent program costs, and the manifest-type use numbers. The EPA calculates the manifest-type use numbers by estimating the expected quantity of manifests to be submitted based on actual manifest submissions from the previous fee interval. The EPA must publish the revised fees on the “[The Hazardous Waste Electronic Manifest System](#)” web page by July 1 of each odd-numbered calendar year. Table 1 describes the fees per manifest type that were effective during FYs 2024 and 2025. The FYs 2024 and 2025 fees were both calculated under the same fee structure.

**Table 1: FYs 2024 and 2025 fees by manifest type**

Type of manifest	Fee per manifest (\$)
Scanned image upload	22.00
Data + image upload	10.00
Electronic manifest (fully electronic and hybrid)	6.00

Source: The EPA’s “[e-Manifest User Fees and Payment Information](#)” web page. (EPA OIG table)

The e-Manifest Act requires the EPA to establish fees that allow it to recover the full cost of providing system-related services. Our analysis did not identify any indication that the fee structure was not reasonable.

### Level of Use of the System

When the e-Manifest system was launched on June 30, 2018, the EPA estimated that it would receive three million manifests annually. According to the EPA, the actual number of manifests generated was unknown because, prior to the launch of the e-Manifest system, manifests were not nationally collected. The Agency thus relied on estimates from industry and other data sources. As more manifest data became available via the e-Manifest system, the EPA reevaluated these estimates. To calculate the FYs 2024 and 2025 fees, the EPA estimated that it would receive 3.6 million manifests over that two-year interval, which would equate to 1.8 million per year. In FY 2024, the EPA received approximately two million manifests. Table 2 describes the totals and percentages of billed manifests by type in FY 2024.

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<sup>1</sup> In FY 2024, the EPA’s gross collection fees totaled \$23.4 million. During the fiscal year, the EPA made fee adjustments totaling \$74,495. Thus, at the end of FY 2024, the EPA had collected \$23.3 million in fees.

**Table 2: Manifest types, totals, and percentages for FY 2024**

Manifest type	Total number of manifests submitted	Percentage (%)
Scanned image upload	199,132	9.98
Data + image upload	1,786,462	89.53
Electronic manifest (fully electronic and hybrid)	9,860	0.49
<b>Total</b>	<b>1,995,454</b>	<b>100.00</b>

Source: OIG analysis of the EPA data. (EPA OIG table)

At approximately 90 percent, the data + image upload is the most billed type of manifest under the e-Manifest system. Compared to electronic manifests, the data + image upload manifests represent additional costs to the EPA, as well as an increased risk of data quality issues. The electronic manifest is the least billed manifest type at 0.49 percent.

In its Hazardous Waste e-Manifest Advisory Board meeting held in 2022, the EPA stated that an important goal of the e-Manifest Program is to realize the significant cost savings that comes with lower user fees, reduced administrative time, and improved accuracy. However, according to the EPA, these cost savings are premised upon the robust adoption of the electronic manifests. The hazardous waste industry has shared with the EPA various challenges that prevent users from submitting electronic manifests, from a lack of network access in certain locations to a significant turnover of industry personnel. These challenges make it difficult to train users; register users in the system; and have users sign, send, and verify electronic signatures in real time.

The EPA plans to continue implementing improvements to the e-Manifest system to increase full electronic manifest adoption. In July 2024, the EPA issued a final rule “aimed to increase the utility of the e-Manifest system to reduce overall burden on the regulated community while enhancing the effectiveness of the manifest forms and e-Manifest system as tools to track Federal and State waste shipments as required under Federal or State laws.”<sup>2</sup>

### The e-Manifest System Operates on a Self-Sustaining Basis, but the EPA Could Take Steps to Increase Collection of Fully Electronic Manifests

The e-Manifest Act requires the EPA to recover the full cost of providing system-related services. In FY 2024, the EPA incurred approximately \$12.9 million in program costs and collected approximately \$23.3 million in fees. The Agency did not receive appropriations for the e-Manifest system in FY 2024, but it had, as of the time of our audit, collected sufficient fees to operate on a self-sustaining basis.

According to EPA data, since the 2018 launch of the system, the Agency has billed for more than 10.8 million manifests through FY 2024. The Agency’s programmatic goal, per 40 C.F.R. § 265.1312(b)(1), was for 75 percent of submitted manifests to be electronic within four years of system implementation.

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<sup>2</sup> Integrating e-Manifest with Hazardous Waste Exports and Other Manifest-Related Reports, PCB Manifest Amendments, and Technical Corrections, 89 Fed. Reg. 60692 (July 26, 2024).

However, as of September 30, 2024, the receiving facilities have chosen to submit other types of manifests, with the use of electronic manifests at less than 0.5 percent, as noted in Table 2. During the Hazardous Waste e-Manifest Advisory Board meeting held in 2023, the Agency emphasized that one of its priorities is to increase the number of electronic manifests submitted, up to full electronic adoption, to be able to realize the e-Manifest Program’s cost-savings benefits. As such, the EPA told us that it intends to conduct outreach activities that will assist with the adoption of electronic manifests.

## Management’s Discussion and Analysis

Our audit was conducted to form an opinion on the e-Manifest Fund financial statements as a whole. The “Management’s Discussion and Analysis” section of the e-Manifest Fund financial statements is presented for the purpose of providing additional analysis and is not a required part of the basic financial statements. Such information is management’s responsibility. We obtained information from the fund’s management about its methods for preparing the “Management’s Discussion and Analysis” section, and we reviewed this information for consistency with the financial statements.

We do not express an opinion on the “Management’s Discussion and Analysis” section.

We did not identify any material inconsistencies between the information presented in the fund’s financial statements and the information presented in the “Management’s Discussion and Analysis” section.

## Prior Report

In our previous audit of the e-Manifest Fund financial statements, as described in EPA OIG Report No. [25-F-0018](#), *Independent Audit of the EPA’s Fiscal Years 2023 and 2022 Hazardous Waste Electronic Manifest System Fund Financial Statements*, issued March 5, 2025, we identified no material weaknesses. That report contained no findings or recommendations.

## Agency Response and OIG Assessment

The Agency did not provide a response to our draft report, as we did not have any findings or recommendations.

*Damon Jackson*

Damon Jackson  
Certified Public Accountant  
Director, Financial Directorate  
Office of Audit  
Office of Inspector General  
U.S. Environmental Protection Agency  
July 28, 2025

***Fiscal Years 2024 and 2023 (Restated)***  
***Hazardous Waste Electronic Manifest System Fund***  
***Financial Statements***

**For the Fiscal Years Ending September 30, 2024 and 2023  
Hazardous Waste Electronic Manifest System Fund (e-Manifest)  
Financial Statements**



*Produced by the U.S. Environmental Protection Agency  
Office of the Chief Financial Officer  
Office of the Controller*

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# Management's Discussion and Analysis

## Introduction

The Hazardous Waste Electronic Manifest System Fund (e-Manifest) was established as a result of the Hazardous Waste Manifest Establishment Act (Public Law 112-195, October 5, 2012). The e-Manifest Act requires the United States Environmental Protection Agency ('EPA' or 'the Agency') to establish and own a hazardous waste electronic manifest program information technology ('IT') system that will enable electronic manifesting as a means to augment or replace the use of paper manifests for tracking hazardous waste shipments. The e-Manifest Act requires that the e-Manifest system:

1. Meets the needs of the user community
2. Attracts sufficient user participation and service revenues to ensure the viability of the system (the e-Manifest Act authorizes EPA to collect reasonable user fees)
3. Decreases the administrative burden on the user community

## Current EPA RCRA Manifest Program

The EPA Office of Land and Emergency Management (OLEM) provides policy, guidance and direction for the Agency's emergency response and waste programs. The Office of Resource Conservation and Recovery (ORCR) within OLEM works to protect human health and the environment by ensuring responsible national management of hazardous and nonhazardous waste. Working with delegated state waste programs, ORCR implements the 1976 Resource Conservation and Recovery Act (RCRA), and ensures that the resource conservation, recovery and waste management goals of RCRA are met. All states with the exception of Iowa and Alaska have been delegated RCRA authority, meaning that states implement many if not all aspects of RCRA policy.

The manifest program as implemented by EPA and the states ensures that hazardous waste shipments are consistently tracked, and that hazardous wastes in fact arrive at permitted waste management facilities. The manifest program is based on both RCRA and Department of Transportation (DOT) hazardous materials law (The Hazardous Materials Transportation Act (HMTA)). These laws together require uniformity in the content and use of the hazardous waste manifest form.

Launched at the end of June of 2018, e-Manifest now receives about 5,000 hazardous waste manifests a day and generates more than \$1 million in fees each month to support the system. EPA estimates that e-Manifest will save state and industry users, on average, \$50 million annually, once electronic manifests are widely adopted. In FY 2024, EPA received ~2 million manifests.

## e-Manifest System Planning Activities

Discussion of the e-Manifest system itself has taken place over many years; beginning back in the 1990's when the concept of an electronic manifest system was first taking shape. Further activities continued over the years to envision the e-Manifest system through various stakeholder discussions and pilots. For more information on EPA's efforts prior to the passage of the e-Manifest Act in 2012, please visit

In early calendar year (CY) 2013, EPA conducted various stakeholder requirements meetings to reengage with the user community. The purpose of these meetings was to build on past e-Manifest work to determine high level system functional requirements. Following this, a system alternatives analysis was conducted to look at various system implementation approaches, all assuming a full electronic mobile workflow. The alternatives analysis recommended that EPA leverage cloud hosting for initial system development and system launch, and for long term operations and maintenance (O&M), consider re-

negotiating the cloud contract model or potentially migrate to an on-premise hosting model to keep costs down.

Also as a part of the planning work, a system Concept of Operations (CONOPS) was completed that, at a high level, outlines both what the current manifest process entails for highway and rail transporters as well as what the future system may look like. The CONOPS document provides a process and conceptual model for how data will flow from stakeholder to stakeholder and through the system during the manifest workflow.

The technical architecture for e-Manifest was completed in FY 2015. This architecture includes the specific components and data flows as currently defined to illustrate a technical solution for the e-Manifest system. In doing so, it defines the specific boundaries of the e-Manifest system and how the different parts of the system work together to provide the required services based on current requirements. For example, areas such as system Cross-Media Electronic Reporting Regulation (CROMERR) integration, paper manifest processing and manifest data quality assurance (QA) were analyzed as a part of this effort.

As a part of this technical architecture planning work, EPA conducted targeted meetings with states and industry separately in order to further flesh out current processes as well as expectations for the above areas. The meetings were more detailed than previous discussions and provided critical information to inform system requirements.

The technical architecture work completed in FY 2015 serves as baseline for the current manifest program and provides very strong foundation for future system buildout. It meets user needs and provides flexibility for future iterations of the system.

Building on FY 2015, in FY 2016 the e-Manifest program realized significant progress while leveraging existing ORCR software applications. EPA initially conceived e-Manifest as a standalone system and allowed the system architects to consider a broad range of approaches without inherent constraints from an existing system design. However, as designs matured, it was recognized that the e-Manifest technical solution aligned closely with RCRAInfo in terms of end user functionality, data integration, and required technical infrastructure. These factors led to the decision to implement e-Manifest as a unique module of RCRAInfo.

Many of the new capabilities of e-Manifest can be implemented in RCRAInfo using the existing modular architecture present in RCRAInfo. In addition, some of the more innovative design aspects of e-Manifest could also be incorporated into RCRAInfo, improving both systems.

Furthermore, by leveraging e-Manifest and RCRAInfo modules, opportunities for reuse of existing technology investments were present, reducing the burden of e-Manifest implementation.

These factors led to the decision to develop e-Manifest and RCRAInfo modules as distinct, but interrelated entities which will meet the current and future needs of Industry, Government and the Public.

### **Acquisition Strategy Change**

The EPA's system development work is focused on ensuring user needs are met from day one of national system deployment. To accomplish this, the agency is conducting user-centered design and development, and is utilizing agile software development methodologies. This approach embodies continuous improvement through pilots and testing, using iterative processes, and continued regular engagement with users and stakeholders throughout the process to provide on-going opportunities for input.

Instead of locking in on one source, the new e-Manifest Program services contract (multi-vendor indefinite delivery/indefinite quantity (IDIQ)) will utilize a variety of vehicles for the following segments of the system:

- Project management including integration services
- Paper manifest processing
- User help desk and user training
- Quality assurance for manifest data amongst industry, states, and the EPA
- Services to calculate, collect, and support reporting of user fees for paper and electronic manifest processing
- Support for stakeholder communication, including outreach and meeting support

Research has shown that using this type of lean start-up methodology, with agile techniques, lowers the cost of system development by addressing uncertainties promptly, and by ensuring that the work being completed brings real value to users.

The agency will continue to work closely with users, adding more functionality in an incremental manner and providing continuous improvement for the lifetime of the system. By taking this iterative approach the EPA will refine remaining uncertainties from our architecture planning work in the most cost-effective manner.

### **e-Manifest System Development**

As a follow-on to the completed technical and conceptual architecture, e-Manifest embarked on a pilot to create initial system functionality with the General Service Administration's (GSA) 18F consulting shop. 18F provided the IT expertise to create the foundation of e-Manifest and also provided agile project management support. Specifically, 18F:

- Introduced user-centered design/development, which engages industry/state users in the early phases of development
- Created the development platform and hosting environment for e-Manifest
- Leveraged open source technologies (Trello, GitHub, biweekly online meetings showcasing recent system updates) to allow users and other stakeholders to follow and participate in system development.

In September 2015, as part of the agile development focus, EPA, in partnership with 18F, completed an initial system demonstration. This focused on a key aspect of the system: the transaction at the end of the chain-of-custody when the hazardous waste arrives at the designated waste management facility, and that facility signs the electronic manifest to verify that all the hazardous waste types and quantities were received. Getting the system to properly electronically execute this all-important manifest transaction was a critical first step. EPA worked with several industry users to complete this initial system functionality. Although not as straightforward as standard government IT development projects, this course correction from traditional lifecycle system development ("waterfall") methodology to agile will ultimately deliver a better system in a quicker, more value-added method going forward.

Starting with this initial system, EPA has been adding more functionality in an incremental manner. Research has shown that using this type of lean start-up methodology with agile techniques lowers the cost of current and future system development by addressing uncertainties sooner rather than later. Therefore, EPA has been conducting user-centered design and development, starting with the small-scale demonstration phase. Open source code and project engages industry and state users in the early phases of

development, creation of development platform, and hosting environment. EPA will expand engagement efforts to all users over time (e.g., states with no systems, large and small generators, etc.).

The agile software development methodology embodies continuous improvement through iterative development and delivers software in sprints. Agile embraces change, continuous and regular feedback and improvement, value-driven delivery, full-team collaboration, and learning through discovery. Agile techniques cannot eliminate the challenges intrinsic to high-discovery software development, but by focusing on continuous delivery of incremental value and shorter feedback cycles, they expose challenges as early as possible to allow for immediate correction.

EPA has adopted the lean start-up product development strategies with agile, user-centered software design/development methodologies and has implemented the following:

- Two-week sprint intervals
- Using modular development practices, relying heavily on available off-the-shelf software modules, by building individual working pieces of the system and integrating them into the whole
- Addressing uncertainties that arose during the initial architecture planning work, and engaging early with users and stakeholders
- Bringing down the cost of current and future development by addressing risk upfront and ensuring that the work being completed brings actual value to stakeholders and users
- Continuously improving, using iterative processes, and engaging regularly with users and stakeholders throughout the life of the program

EPA has made every effort to involve industry users in the development process to build the strongest possible system. During the system development phase, the e-Manifest team is working alongside industry, states, and other stakeholders, focusing on issues raised and addressing the issues, including the following:

- How the national e-Manifest system will connect with state and industry systems
- User testing of the web application
- Addressing state data access needs

The e-Manifest team communicates regularly with states, industry, and related stakeholders about ongoing developments (i.e., continued release and testing of system iterations), updates on e-Manifest related rules (i.e., user fees for the e-Manifest system and amendments to manifest regulations), and the national launch of the e-Manifest system.

Our primary methods of communication include the following:

- The e-Manifest website
- User testing
- Conferences
- Site visits
- Regional implementation working groups
- Listserv (general interest and development-focused)
- Public webinars
- Blog posts

- GitHub – code repository and project management
- FACA Meetings
- Meetings with stakeholders.

e-Manifest follows this path of milestones from system launch and beyond:

- September 2015– initial system functionality completed.
- Spring of 2016 – minimal viable product development.
- Spring through fall of 2016 – early full-scale development.
- Fall of 2016 through winter of 2018 – rolling iterative releases/testing of system.
- Winter 2018 – finalize user fee rule
- June 30, 2018 System Launch
- Continued development, enhancements and user outreach
- Summer 2019 – update user fees
- Winter 2020 – deployed updated electronic signature approach
- Summer 2021 – update user fees
- Fall 2021 – engage stakeholders on enhancing electronic adoption
- Fall 2022 – present options for increasing electronic adoption
- Summer 2023 – update user fees
- Fall 2023 – enhance user correction functionality
- Winter 2023 – perform data quality assurance
- Spring 2024 – enhance system to system communication with electronic signature enhancements
- Winter 2024 - Added functionality to allow users to see changes between manifest versions

## Principal Financial Statements

**U.S. Environmental Protection Agency  
Hazardous Waste Electronic Manifest System Fund  
Balance Sheet  
As of September 30, 2024 and 2023  
(Dollars in Thousands)**

	<b>2024</b>	<b>2023</b>
<b>ASSETS</b>		
Intragovernmental:		
Fund Balance with Treasury (Note 2)	\$ 54,986	\$ 45,425
Accounts Receivable, Net (Note 3)	3	2
Advances and Prepayments	650	401
Total Intragovernmental	55,639	45,828
Other Than Intragovernmental		
Accounts Receivable, Net (Note 3)	2,231	2,666
Total Other Than Intragovernmental	2,231	2,666
<b>Total Assets</b>	<b>\$ 57,870</b>	<b>\$ 48,494</b>
<b>LIABILITIES</b>		
Intragovernmental:		
Other Liabilities (Note 7)	\$ 313	\$ 56
Total Intragovernmental	313	56
Other Than Intragovernmental:		
Accounts Payable (Note 4)	296	1,174
Federal Employee Benefits Payable (Note 6)	151	135
Other Liabilities (Note 7)	659	613
Total Other Than Intragovernmental	1,106	1,922
<b>Total Liabilities</b>	<b>\$ 1,419</b>	<b>\$ 1,978</b>
<b>NET POSITION</b>		
Unexpended Appropriations - Funds from Dedicated Collections	\$ 61	\$ 211
Cumulative Results of Operations - Funds from Dedicated Collections	56,390	46,305
Total Net Position	56,451	46,516
<b>Total Liabilities and Net Position</b>	<b>\$ 57,870</b>	<b>\$ 48,494</b>

The accompanying notes are an integral part of these financial statements  
EPA's FY 2024 e-Manifest Financial Statements

**U.S. Environmental Protection Agency**  
**Hazardous Waste Electronic Manifest System Fund**  
**Statement of Net Cost**  
**For the Fiscal Years Ended September 30, 2024 and 2023**  
**(Dollars in Thousands)**

	<b>2024</b>	<b>2023</b>
<b>COSTS</b>		
Gross Costs	\$ 13,098	\$ 13,176
Expenses from Other Appropriations (Note 9)	2,440	2,337
Less: Earned Revenue	22,924	25,385
<b>NET COST OF OPERATIONS</b> (Notes 10 and 11)	<b>\$ (7,386)</b>	<b>\$ (9,872)</b>

The accompanying notes are an integral part of these financial statements  
EPA's FY 2024 e-Manifest Financial Statements

**U.S. Environmental Protection Agency  
Hazardous Waste Electronic Manifest System Fund  
Statement of Changes in Net Position  
For the Fiscal Years Ended September 30, 2024 and 2023  
(Dollars in Thousands)**

	<b>2024</b>	<b>2023</b>
<b>UNEXPENDED APPROPRIATIONS:</b>		
Beginning Balance	\$ <u>211</u>	\$ <u>211</u>
Beginning Balance, as Adjusted	211	211
Other Adjustments	(144)	-
Appropriations Used	(6)	-
Change in Unexpended Appropriations	<u>(150)</u>	<u>-</u>
<b>Total Unexpended Appropriations</b>	<b><u>\$ 61</u></b>	<b><u>\$ 211</u></b>
<b>CUMULATIVE RESULTS OF OPERATIONS:</b>		
Beginning Balance	\$ 46,305	\$ 33,724
Appropriations Used	6	-
Income from Other Appropriations (Note 9)	2,440	2,337
Imputed Financing	253	372
Net Cost of Operations	<u>7,386</u>	<u>9,872</u>
Net Change in Cumulative Results of Operations	<u>10,085</u>	<u>12,581</u>
<b>Total Cumulative Results of Operations</b>	<b><u>56,390</u></b>	<b><u>46,305</u></b>
<b>NET POSITION</b>	<b><u>\$ 56,451</u></b>	<b><u>\$ 46,516</u></b>

The accompanying notes are an integral part of these financial statements  
EPA's FY 2024 e-Manifest Financial Statements

**U.S. Environmental Protection Agency**  
**Hazardous Waste Electronic Manifest System Fund**  
**Statement of Budgetary Resources**  
**For the Fiscal Years Ended September 30, 2024 and 2023**  
**(Dollars in Thousands)**

	<b>2024</b>	<b>2023</b>
<b>BUDGETARY RESOURCES</b>		
Unobligated Balance From Prior Year Budget Authority, Net (discretionary) (Note 8)	\$ 35,683	\$ 21,630
Spending Authority from Offsetting Collections (discretionary)	<u>23,606</u>	<u>24,890</u>
Total Budgetary Resources	<u>\$ 59,289</u>	<u>\$ 46,520</u>
<b>STATUS OF BUDGETARY RESOURCES</b>		
New Obligations and Upward adjustments (total)	\$ 16,742	\$ 10,962
Unobligated Balance, End of Year:		
Apportioned, Unexpired Accounts	42,480	35,347
Expired Unobligated Balance, End of Year	<u>67</u>	<u>211</u>
Unobligated Balance, End of Year (total): (Note 8)	<u>42,547</u>	<u>35,558</u>
Total Budgetary Resources	<u>\$ 59,289</u>	<u>\$ 46,520</u>
<b>OUTLAYS, NET</b>		
Outlays, Net (total) (discretionary) (Note 8)	<u>\$ (9,706)</u>	<u>\$ (13,185)</u>
Agency Outlays, Net (discretionary)	<u>\$ (9,706)</u>	<u>\$ (13,185)</u>

The accompanying notes are an integral part of these financial statements  
EPA's FY 2024 e-Manifest Financial Statements

**U.S. Environmental Protection Agency**  
**Hazardous Waste Electronic Manifest System Fund**  
**Notes to the Financial Statements**  
**Fiscal Years Ended September 30, 2024 and 2023**  
**(Dollars in Thousands)**

**Note 1. Summary of Significant Accounting Policies**

**A. Reporting Entity**

The EPA was created in 1970 by executive reorganization from various components of other federal agencies to better marshal and coordinate federal pollution control efforts. The Agency is generally organized around the media and substances it regulates - air, water, waste, pesticides, and toxic substances.

The Hazardous Waste Electronic Manifest System Fund (e-Manifest) was authorized by the establishment of the Hazardous Waste Electronic Manifest System Act. The act mandates that the Agency, within three years, establish a hazardous waste electronic manifest system that can be accessed by any user. The act authorized the administrator to impose user fees to pay the costs incurred in developing, operating, maintaining, and upgrading the system, including any costs incurred in collecting and processing data from paper manifests submitted to the system after the date on which the system enters operations.

The e-Manifest fund charges some administrative costs directly to the fund and charges the remainder of the indirect administrative costs to Agency-wide appropriations. These amounts are included as “Income from Other Appropriations” on the Statement of Changes in Net Position and as “Expenses from Other Appropriations” on the Statement of Net Cost.

**B. Basis of Presentation**

These financial statements have been prepared to report the financial position and results of operations of the EPA for the e-Manifest Fund in accordance with the Chief Financial Officers Act of 1990 and the Government Management Reform Act of 1994. The reports have been prepared from the books and records of the EPA in accordance with Office of Management and Budget (OMB) Circular A-136 *Financial Reporting Requirements* revised May 30, 2024, and the EPA's accounting policies which are summarized in this note. These statements are therefore different from the financial reports also prepared by the EPA pursuant to the OMB directives that are used to monitor and control the EPA's use of budgetary resources.

**C. Budgets and Budgetary Accounting**

For fiscal years 2024 and 2023, the e-Manifest fund was funded through offsetting collections.

**D. Basis of Accounting**

Generally Accepted Accounting Principles (GAAP) for federal entities is the standard prescribed by the Federal Accounting Standards Advisory Board (FASAB), which is the official standard-setting body for the Federal Government and the American Institute of Certified Public Accountants (AICPA). The financial statements are prepared in accordance with GAAP for federal entities.

Transactions are recorded on an accrual accounting basis and a budgetary basis. Under the accrual method, revenues are recognized when earned, and expenses are recognized when liabilities are incurred, without regard to receipt or payment of cash. Budgetary accounting facilitates compliance with legal constraints and controls over the use of federal funds posted in accordance with OMB directives and the U.S. Treasury regulations.

**U.S. Environmental Protection Agency**  
**Hazardous Waste Electronic Manifest System Fund**  
**Notes to the Financial Statements**  
**Fiscal Years Ended September 30, 2024 and 2023**  
**(Dollars in Thousands)**

**E. Revenues and Other Financing Sources**

For fiscal years 2024 and 2023, EPA received funding from fees collected and recognized revenues from collections to the extent that expenses were incurred during the fiscal year.

**F. Funds with the Treasury**

The e-Manifest fund deposits receipts and processes disbursements through its operating account maintained at the U.S. Department of Treasury.

**G. General Property, Plant, and Equipment**

General property, plant, and equipment for e-Manifest consists of software in production. Internal use software includes purchased commercial off-the-shelf software, contractor developed software and software that was internally developed by Agency employees. Internal use software is capitalized at full cost (direct and indirect) and amortized using the straight-line method over its useful life, not exceeding five years. The Hazardous Waste Electronic Manifest System was placed into production on August 23, 2018.

**H. Liabilities**

Liabilities represent the amount of monies or other resources that are more likely than not to be paid by the Agency as the result of an Agency transaction or event that has already occurred and can be reasonably estimated. However, no liability can be paid by the Agency without an appropriation or other collections authorized for retention. Liabilities for which an appropriation has not been enacted are classified as unfunded liabilities and there is no certainty that the appropriations will be enacted. Liabilities of the Agency arising from other than contracts can be abrogated by the Government acting in its sovereign capacity.

**I. Accrued Unfunded Annual Leave**

Annual, sick, and other leave is expensed as taken during the fiscal year. Annual leave earned but not taken at the end of the fiscal year is accrued as an unfunded liability. Accrued unfunded annual leave is included in the Balance Sheet as a component of "Federal Employee Benefits Payable." Sick leave earned but not taken is not accrued as a liability; it is expensed as it is used.

**J. Retirement Plan**

There are two primary retirement systems for federal employees. Employees hired prior to January 1, 1987, may participate in the Civil Service Retirement System (CSRS). On January 1, 1987, the Federal Employees Retirement System (FERS) went into effect pursuant to Public Law 99-335. Most employees hired after December 31, 1986, are automatically covered by FERS and Social Security. Employees hired prior to January 1, 1987, elected to either join FERS and Social Security or remain in CSRS. A primary feature of FERS is that it offers a savings plan to which the Agency automatically contributes one percent of pay and matches any employee contributions up to an additional four percent of pay. The Agency also contributes the employer's matching share for Social Security.

With the issuance of SFFAS No. 5, *Accounting for Liabilities of the Federal Government*, accounting, and reporting standards were established for liabilities relating to the federal employee benefit programs (Retirement, Health Benefits, and Life Insurance). SFFAS No. 5 requires that the employing agencies recognize the cost of pensions and other retirement benefits during their employees' active years of service.

**U.S. Environmental Protection Agency**  
**Hazardous Waste Electronic Manifest System Fund**  
**Notes to the Financial Statements**  
**Fiscal Years Ended September 30, 2024 and 2023**  
**(Dollars in Thousands)**

SFFAS No. 5 requires that the Office of Personnel Management (OPM), as administrator of the CSRS and FERS, the Federal Employees Health Benefits Program, and the Federal Employees Group Life Insurance Program, provide federal agencies with the actuarial cost factors to compute the liability for each program.

**K. Prior Period Adjustments and Restatements**

Prior period adjustments, if any, are made in accordance with SFFAS No. 21, *Reporting Corrections of Errors and Changes in Accounting Principles*. Specifically, prior period adjustments will only be made for material prior period errors to: (1) the current period financial statements, and (2) the prior period financial statements presented for comparison. Adjustments related to changes in accounting principles will only be made to the current period financial statements, but not to prior period financial statements presented for comparison.

**L. Use of Estimates**

The preparation of financial statements requires management to make certain estimates and assumptions that affect the reported amounts of assets and liabilities, including environmental and grant liabilities, and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.

**M. Reclassifications and Comparative Figures**

Certain reclassifications have been made to the prior year's financial statements to enhance comparability with the current year's financial statements in accordance with Office of Management and Budget (OMB) Circular No. A-136, *Financial Reporting Requirements* revised May 30, 2024. As a result, the form and content of the Balance Sheet, Statement of Changes in Net Position and footnotes have changed to conform with OMB Circular No. A-136.

**U.S. Environmental Protection Agency**  
**Hazardous Waste Electronic Manifest System Fund**  
**Notes to the Financial Statements**  
**Fiscal Years Ended September 30, 2024 and 2023**  
**(Dollars in Thousands)**

**Note 2. Fund Balance with Treasury (FBWT)**

Fund Balance with Treasury as of September 30, 2024 and 2023, consists of the following:

	<u>2024</u>			<u>2023</u>		
	<u>Entity Assets</u>	<u>Non-Entity Assets</u>	<u>Total</u>	<u>Entity Assets</u>	<u>Non-Entity Assets</u>	<u>Total</u>
<b>Revolving Funds:</b>						
e-Manifest	\$ 54,986	\$ -	\$ 54,986	\$ 45,425	\$ -	\$ 45,425
<b>Total</b>	<b>\$ 54,986</b>	<b>\$ -</b>	<b>\$ 54,986</b>	<b>\$ 45,425</b>	<b>\$ -</b>	<b>\$ 45,425</b>

**Status of Fund Balances:**

**Unobligated Amounts in Fund Balance:**

	<u>2024</u>	<u>2023</u>
Available for Obligation	\$ 42,480	\$ 35,558
Unavailable for Obligation	67	-
Obligated Balance not yet Disbursed	<u>12,439</u>	<u>9,867</u>
<b>Total</b>	<b>\$ 54,986</b>	<b>\$ 45,425</b>

**Note 3. Accounts Receivable, Net**

Accounts Receivable as of September 30, 2024 and 2023, consist of the following:

	<u>2024</u>	<u>2023</u>
<b>Intragovernmental:</b>		
Accounts Receivable	\$ 3	\$ 2
<b>Total</b>	<b>\$ 3</b>	<b>\$ 2</b>
<b>Other Than Intragovernmental:</b>		
Accounts Receivable	\$ 2,253	\$ 2,678
Less: Allowance for Uncollectible	<u>(22)</u>	<u>(12)</u>
<b>Total</b>	<b>\$ 2,231</b>	<b>\$ 2,666</b>

The Allowance for Uncollectible Accounts is determined both on a specific identification and percentage basis. Specific identification is used for a case-by-case review of receivables, and percentage basis is used for receivables not specifically identified.

**U.S. Environmental Protection Agency  
Hazardous Waste Electronic Manifest System Fund  
Notes to the Financial Statements  
Fiscal Years Ended September 30, 2024 and 2023  
(Dollars in Thousands)**

**Note 4. Accounts Payable**

Accounts Payable are current liabilities and consist of the following amounts as of September 30, 2024 and 2023:

	<b>2024</b>	<b>2023</b>
<b>Other Than Intragovernmental:</b>		
Accounts Payable	\$ 296	\$ 1,174
<b>Total</b>	<b>\$ 296</b>	<b>\$ 1,174</b>

**Note 5. General Property, Plant and Equipment, Net**

As of September 30, 2024, General PP&E Cost consisted of the following:

	<b>2024</b>						
	<b>EPA- Held Equipment</b>	<b>Software (production)</b>	<b>Software (development)</b>	<b>Contractor Held Equipment</b>	<b>Land and Buildings</b>	<b>Capital Leases</b>	<b>Total</b>
<b>Balance, Beginning of Year</b>	\$ -	\$ 6,907	\$ -	\$ -	\$ -	\$ -	\$ 6,907
<b>Balance, End of Year</b>	\$ -	\$ 6,907	\$ -	\$ -	\$ -	\$ -	\$ 6,907

As of September 30, 2024, General PP&E Accumulated Depreciation consisted of the following:

	<b>2024</b>						
	<b>EPA- Held Equipment</b>	<b>Software (production)</b>	<b>Software (development)</b>	<b>Contractor Held Equipment</b>	<b>Land and Buildings</b>	<b>Capital Leases</b>	<b>Total</b>
<b>Balance, Beginning of Year</b>	\$ -	\$ 6,907	\$ -	\$ -	\$ -	\$ -	\$ 6,907
<b>Balance, End of Year</b>	\$ -	\$ 6,907	\$ -	\$ -	\$ -	\$ -	\$ 6,907

**U.S. Environmental Protection Agency  
Hazardous Waste Electronic Manifest System Fund  
Notes to the Financial Statements  
Fiscal Years Ended September 30, 2024 and 2023  
(Dollars in Thousands)**

As of September 30, 2024, General PP&E, Net consisted of the following:

	<b>2024</b>						
	<b><u>EPA- Held Equipment</u></b>	<b><u>Software (production)</u></b>	<b><u>Software (development)</u></b>	<b><u>Contractor Held Equipment</u></b>	<b><u>Land and Buildings</u></b>	<b><u>Capital Leases</u></b>	<b><u>Total</u></b>
<b>Balance, End of Year, Net</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

As of September 30, 2023, General PP&E Cost consisted of the following:

	<b>2023</b>						
	<b><u>EPA- Held Equipment</u></b>	<b><u>Software (production)</u></b>	<b><u>Software (development)</u></b>	<b><u>Contractor Held Equipment</u></b>	<b><u>Land and Buildings</u></b>	<b><u>Capital Leases</u></b>	<b><u>Total</u></b>
<b>Balance, Beginning of Year</b>	\$ -	\$ 6,907	\$ -	\$ -	\$ -	\$ -	\$ 6,907
<b>Balance, End of Year</b>	\$ -	\$ 6,907	\$ -	\$ -	\$ -	\$ -	\$ 6,907

As of September 30, 2023, General PP&E Accumulated Depreciation consisted of the following:

	<b>2023</b>						
	<b><u>EPA- Held Equipment</u></b>	<b><u>Software (production)</u></b>	<b><u>Software (development)</u></b>	<b><u>Contractor Held Equipment</u></b>	<b><u>Land and Buildings</u></b>	<b><u>Capital Leases</u></b>	<b><u>Total</u></b>
<b>Balance, Beginning of Year</b>	\$ -	\$ 6,045	\$ -	\$ -	\$ -	\$ -	\$ 6,045
<b>Depreciation Expense</b>	-	862	-	-	-	-	862
<b>Balance, End of Year</b>	\$ -	\$ 6,907	\$ -	\$ -	\$ -	\$ -	\$ 6,907

**U.S. Environmental Protection Agency  
Hazardous Waste Electronic Manifest System Fund  
Notes to the Financial Statements  
Fiscal Years Ended September 30, 2024 and 2023  
(Dollars in Thousands)**

As of September 30, 2023, General PP&E, Net consisted of the following:

	<b>2023</b>						
	<b>EPA- Held Equipment</b>	<b>Software (production)</b>	<b>Software (development)</b>	<b>Contractor Held Equipment</b>	<b>Land and Buildings</b>	<b>Capital Leases</b>	<b>Total</b>
<b>Balance, End of Year, Net</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

**Note 6. Federal Employee Benefits Payable**

Payroll and benefits payable to the EPA employees for the fiscal years ending September 30, 2024, and 2023, consist of the following:

	<b>Covered by Budgetary Resources</b>	<b>Not Covered by Budgetary Resources</b>	<b>Total</b>
<b>FY 2024 Payroll and Benefits Payable</b>			
Accrued Unfunded Annual Leave	\$ -	\$ 151	\$ 151
<b>Total - Non-Current</b>	<b>\$ -</b>	<b>\$ 151</b>	<b>\$ 151</b>
	<b>Covered by Budgetary Resources</b>	<b>Not Covered by Budgetary Resources</b>	<b>Total</b>
<b>FY 2023 Payroll and Benefits Payable</b>			
Accrued Unfunded Annual Leave	\$ -	\$ 135	\$ 135
<b>Total - Non-Current</b>	<b>\$ -</b>	<b>\$ 135</b>	<b>\$ 135</b>

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**Note 7. Other Liabilities**

Other Liabilities consist of the following as of September 30, 2024:

	<u>Covered by Budgetary Resources</u>	<u>Not Covered by Budgetary Resources</u>	<u>Total</u>
<b>Intragovernmental</b>			
<b>Current</b>			
Accrued Liabilities	\$ <u>313</u>	\$ -	\$ <u>313</u>
<b>Total Intragovernmental</b>	<b>\$ <u>313</u></b>	<b>\$ -</b>	<b>\$ <u>313</u></b>
<b>Other Than Intragovernmental</b>			
<b>Current</b>			
Accrued Funded Payroll and Benefits	\$ 52	\$ -	\$ 52
Other	<u>607</u>	<u>-</u>	<u>607</u>
<b>Total Other Than Intragovernmental</b>	<b>\$ <u>659</u></b>	<b>\$ -</b>	<b>\$ <u>659</u></b>

Other Liabilities consist of the following as of September 30, 2023:

	<u>Covered by Budgetary Resources</u>	<u>Not Covered by Budgetary Resources</u>	<u>Total</u>
<b>Intragovernmental</b>			
<b>Current</b>			
Accrued Liabilities	\$ <u>56</u>	\$ -	\$ <u>56</u>
<b>Total Intragovernmental</b>	<b>\$ <u>56</u></b>	<b>\$ -</b>	<b>\$ <u>56</u></b>
<b>Other Than Intragovernmental</b>			
<b>Current</b>			
Accrued Funded Payroll and Benefits	\$ 41	\$ -	\$ 41
Other	<u>572</u>	<u>-</u>	<u>572</u>
<b>Total Other Than Intragovernmental</b>	<b>\$ <u>613</u></b>	<b>\$ -</b>	<b>\$ <u>613</u></b>

**Note 8. Statement of Budgetary Resources**

The purpose of Federal budgetary accounting is to control, monitor, and report on funds made available to Federal agencies bylaw and help ensure compliance with law. The following budget terms from OMB Circular A-11, Section 20.3 are commonly used:

- **Appropriation:** A provision of law (not necessarily in an appropriations act) authorizing the expenditure of funds for a given purpose. Usually, but not always, an appropriation provides budget authority.

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- **Budgetary resources:** Amounts available to incur obligations in a given year. Budgetary resources consist of new budget authority and unobligated balances of budget authority provided in previous years.
- **Distributed offsetting receipts:** Amounts that an agency collects from the public or from other U.S. Government agencies that are used to offset or reduce an agency's budget outlays. Agency outlays are measured on both a gross and net basis, with net outlays being reduced by offsetting receipts (and other amounts).
- **Offsetting collections:** Payments to the Government that, by law, are credited directly to expenditure accounts and deducted from gross budget authority and outlays of the expenditure account, rather than added to receipts. Usually, offsetting collections are authorized to be spent for the purposes of the account without further action by Congress. They usually result from business-like transactions with the public, including payments from the public in exchange for goods and services, reimbursements for damages, and gifts or donations of money to the Government and from intragovernmental transactions with other Government accounts. The authority to spend offsetting collections is a form of budget authority.
- **Offsetting receipts:** Payments to the Government that are credited to offsetting receipt accounts and deducted from gross budget authority and outlays, rather than added to receipts. Usually, they are deducted at the level of the agency and subfunction, but in some cases they are deducted at the level of the Government as a whole. They are not authorized to be credited to expenditure accounts. The legislation that authorizes the offsetting receipts may earmark them for a specific purpose and either appropriate them for expenditure for that purpose or require them to be appropriated in annual appropriations acts before they can be spent. Like offsetting collections, they usually result from business-like transactions with the public, including payments from the public in exchange for goods and services, reimbursements for damages, and gifts or donations of money to the Government, and from intragovernmental transactions with other Government accounts.
- **Obligation:** A binding agreement that will result in outlays, immediately or in the future. Budgetary resources must be available before obligations can be incurred legally.
- **Outlay:** A payment to liquidate an obligation. Outlays generally are equal to cash disbursements and are the measure of Government spending.

Recoveries of Prior Year Obligations on the Statement of Budgetary Resources consist of the following amounts for September 30, 2024, and 2023:

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	<b>2024</b>	<b>2023</b>
Unobligated Balance Brought Forward, Oct 1.	<u>\$ 35,558</u>	<u>\$ 21,607</u>
<b>Adjustments to Budgetary Resources Made During the Current Year</b>		
Downward Adjustments of Prior Year Undelivered Orders	125	23
<b>Unobligated Balance from Prior Year Budget Authority, Net (discretionary)</b>	<u>\$ 35,683</u>	<u>\$ 21,630</u>
<b>Permanently Not Available:</b>		
Rescinded Authority	<u>144</u>	<u>-</u>
<b>Total Permanently Not Available</b>	<u>\$ 144</u>	<u>\$ -</u>

Unobligated balances are a combination of two lines on the Statement of Budgetary Resources: Apportioned and Expired Unobligated Balances. Unapportioned, unexpired balances are available to be apportioned by the OMB for new obligations at the beginning of the following fiscal year. The expired unobligated balances are only available for upward adjustments of existing obligations.

The unobligated balances available consist of the following as of September 30, 2024 and 2023:

	<b>2024</b>	<b>2023</b>
Apportioned, Unexpired Accounts	\$ 42,480	\$ 35,347
Expired Unobligated Balance, End of Year	<u>67</u>	<u>211</u>
<b>Total</b>	<u>\$ 42,547</u>	<u>\$ 35,558</u>

Budgetary resources obligated for undelivered orders as of September 30, 2024 and 2023:

	<b>2024</b>	<b>2023</b>
<b>Intragovernmental:</b>		
Unpaid Undelivered Orders	\$ 520	\$ 1,673
Paid Undelivered Orders	650	401
<b>Other Than Intragovernmental:</b>		
Unpaid Undelivered Orders	<u>10,656</u>	<u>6,356</u>
<b>Total</b>	<u>\$ 11,826</u>	<u>\$ 8,430</u>

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**Note 9. Income and Expenses from Other Appropriations**

The Statement of Net Cost reports the program costs that include the full cost of the program outputs and consist of the direct costs and all other costs that can be directly traced, assigned on a cause-and-effect basis, or reasonably allocated to program outputs.

During FYs 2024 and 2023, the indirect rate was 18.63% and 17.74%, respectively.

As illustrated below there is a net zero impact on e-Manifest's Statement of Changes in Net Position.

	<b>2024</b>	<b>2023</b>
Income from Other Appropriations	\$ 2,440	\$ 2,337
Expenses from Other Appropriations	2,440	2,337
Net Effect	\$ -	\$ -

**Note 10. Exchange Revenue**

	<b>2024</b>	<b>2023</b>
<b>Costs:</b>		
Intragovernmental	\$ 3,734	\$ 3,333
Other than Intragovernmental	9,364	9,843
Expenses from Other Appropriations	2,440	2,337
Total Costs	\$ 15,538	\$ 15,513
<b>Revenue:</b>		
Intragovernmental	\$ 24	\$ 26
Other than Intragovernmental	22,900	25,359
Total Revenue	\$ 22,924	\$ 25,385
<b>Net Cost of Operations:</b>	<b>\$ (7,386)</b>	<b>\$ (9,872)</b>

Intragovernmental costs relate to the source of the goods or services not the classification of related revenue.

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**Note 11. Reconciliation of Net Cost of Operations to Net Outlays**

**For the Fiscal Year Ended September 30, 2024:**

	<u>Intra- governmental</u>	<u>Other Than Intra- governmental</u>	<u>Total 2024</u>
<b>NET COST</b>	<b>\$ 3,710</b>	<b>\$ (11,096)</b>	<b>\$ (7,386)</b>
<b>Components of Net Cost That Are Not Part of Net Outlays:</b>			
Expenses from Other Appropriations	-	(2,440)	(2,440)
<b>Increase/(Decrease) in Assets:</b>			
Accounts Receivable	-	(435)	(435)
Other Assets	249	-	249
<b>(Increase)/Decrease in Liabilities:</b>			
Accounts Payable and Accrued Liabilities	(257)	878	621
Federal Employee Benefits Payable	-	(16)	(16)
Other Liabilities	-	(46)	(46)
<b>Financing Sources:</b>			
Imputed Financing	(253)	-	(253)
<b>Total Components of Net Cost That Are Not Part of Net Outlays</b>	<b>(261)</b>	<b>(2,059)</b>	<b>(2,320)</b>
<b>NET OUTLAYS</b>	<b><u>\$ 3,449</u></b>	<b><u>\$ (13,155)</u></b>	<b><u>\$ (9,706)</u></b>

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**For the Fiscal Year Ended September 30, 2023:**

	<u>Intra- governmental</u>	<u>Other Than Intra- governmental</u>	<u>Total 2023</u>
<b>NET COST</b>	\$ 3,307	\$ (13,179)	\$ (9,872)
<b>Components of Net Cost That Are Not Part of Net Outlays:</b>			
Property, Plant and Equipment Depreciation	-	(862)	(862)
Expenses from Other Appropriations	-	(2,337)	(2,337)
<b>Increase/(Decrease) in Assets:</b>			
Accounts Receivable	(2)	455	453
Other Assets	394	-	394
<b>(Increase)/Decrease in Liabilities:</b>			
Accounts Payable and Accrued Liabilities	22	(833)	(811)
Federal Employee Benefits Payable	-	9	9
Other Liabilities	-	213	213
<b>Financing Sources:</b>			
Imputed Financing	(372)	-	(372)
<b>Total Components of Net Cost That Are Not Part of Net Outlays</b>	<b>42</b>	<b>(3,355)</b>	<b>(3,313)</b>
<b>Other Temporary Timing Differences</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>NET OUTLAYS</b>	<b>\$ <u>3,349</u></b>	<b>\$ <u>(16,534)</u></b>	<b>\$ <u>(13,185)</u></b>

Budgetary and financial accounting information differ. Budgetary accounting is used for planning and control purposes and relates to both the receipt and use of cash, as well as reporting the federal deficit. Financial accounting is intended to provide a picture of the government's financial operations and financial position, so it presents information on an accrual basis. The accrual basis includes information about costs arising from the consumption of assets and the incurrence of liabilities. The reconciliation of net outlays, presented on a budgetary basis, and the net cost, presented on an accrual basis, provides an explanation of the relationship between budgetary and financial accounting information. The reconciliation serves not only to identify costs paid for in the past and those that will be paid in the future, but also to assure integrity between budgetary and financial accounting. The reconciliation explains the relationship between the net cost of operations and net outlays by presenting components of net cost that are not part of net outlays (e.g., depreciation and amortization expenses of assets previously capitalized, change in asset/liabilities), components of net outlays that are not part of net cost (e.g., acquisition of capital assets), other temporary timing difference (e.g., prior period adjustments due to correction of errors). The analysis above illustrates this reconciliation by listing the key differences between net cost and net outlays.

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U.S. Environmental Protection Agency

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