e-Manifest Fact Sheet: Brokers

On June 30, 2018, U.S. EPA launched a national system for tracking hazardous waste shipments electronically. This system known as "e-Manifest," modernizes the nation's cradle-to-grave hazardous waste tracking process while saving valuable time, resources, and dollars for industry and states. U.S. EPA established e-Manifest per the Hazardous Waste Electronic Manifest Establishment Act, which Congress enacted into law on October 5, 2012. e-Manifest is a multi-faceted program that includes system development, regulation and policy, implementation and communication, and consultation with the e-Manifest federal advisory committee.

What Brokers Need to Know

- e-Manifest launched nationwide June 30, 2018.
- Brokers have the option to prepare manifests electronically for their generator clients.
- To use e-Manifest, brokers will need to obtain an EPA ID and register for e-Manifest.
- The 6-copy manifest form has been replaced with a 5-copy form. The new form became effective June 30, 2018.

Scope of e-Manifest

e-Manifest facilitates the electronic transmission of the uniform manifest form, which accompanies shipments of hazardous waste. e-Manifest affects any regulated waste shipped on a manifest, including:

- RCRA federal hazardous waste,
- Regulated PCB waste shipped on a manifest,
- State-regulated hazardous waste (if manifest is required by origination or destination state),
- Very Small Quantity Generator waste (if manifest required by state), and
- Imported hazardous waste.

U.S. EPA implements the e-Manifest regulations until Resource Conservation and Recovery Act (RCRA) authorized states adopt and become authorized for the e-Manifest regulations. (Note: some parts of the e-Manifest regulations, such as collection of user fees, will only be implemented by U.S. EPA.) Ohio's manifest requirements are equivalent to U.S. EPA's.

RCRAInfo

e-Manifest is linked to the existing RCRA Information System (RCRAInfo) and has the ability to validate information entered on an electronic manifest against information in RCRAInfo.

RCRAInfo is a U.S. EPA information system that collects information on hazardous waste sites. Information in RCRAInfo is publicly available on RCRAInfo Web: https://rcrainfo.epa.gov/rcrainfoweb/action/main-menu/view.

How e-Manifest Impacts Brokers

Because brokers may service multiple clients, U.S. EPA requires them to obtain an EPA ID Number using the Site Identification Form. This will enable brokers to track their manifest activities in e-Manifest and make draft manifests available to their clients. Ohio-based brokers should complete Ohio EPA's form EPA 9029 either on paper or electronically using myRCRAid. Go to https://epa.ohio.gov/derr/hazwaste/notiform for more information.

Brokers may not sign manifests in e-Manifest remotely on behalf of their generator clients, unless the broker is operating at the generator site and is the offeror of the waste shipment. In that case, a broker can sign the manifest.

What Brokers Need to Do

Obtain/Update EPA ID Number

Brokers must have an ID number to use e-Manifest. Ohio brokers must submit Ohio EPA's Site Identification Form (EPA 9029) to obtain an EPA ID Number, and mark the Electronic Manifest Broker box. A fillable Microsoft Word version can be found at http://epa.ohio.gov/derr/hazwaste/notiform.aspx along with information about filing electronically by registering for myRCRAid.

RCRAInfo Industry Application users who previously signed up for myRCRAid only can easily add an e-Manifest permission to their account by clicking on their name in the upper right corner of the Home page, selecting Profile and then the My Site Permissions tab. Click the box for the facility you wish to change permissions for and follow the prompts.

Work with Customers to Select Manifest Creation Option

The e-Manifest system allows for three types of hazardous waste manifest creation options:

- Paper (generator, transporter, and receiving facility all sign on paper)
- Hybrid (starts as paper manifest signed by the generator and then is signed electronically by the transporter and receiving facility)
- Electronic (created in e-Manifest and electronically signed by all entities listed on the manifest)

As of June 30, 2018, all receiving facilities must submit manifests to U.S. EPA. Electronic and hybrid manifests are submitted to U.S. EPA instantaneously, as they are signed electronically in the system. U.S. EPA's Cross-Media Electronic Reporting Rule (CROMERR) provides the legal framework for electronic reporting under U.S. EPA's regulatory programs. Those submitting final completed manifests or subsequent corrections need to go through identity proofing plus sign using a CROMERR-compliant electronic signature (e.g., password plus personal challenge question). They must be a Site Manager or Certifier.

If a paper manifest is used, the receiving facility must submit the manifest to U.S. EPA within 30 days of receipt. Receiving facilities have two options for submitting paper manifests to U.S. EPA: uploading a scanned image or submitting data plus image files via e-Manifest.

Brokers can utilize U.S. EPA's e-Manifest website to create electronic manifests for their customers or they can utilize the e-Manifest API (Advanced Programming Interface) to add e-Manifesting capabilities to their existing manifesting system.

Register with e-Manifest

e-Manifest registration and instructions are available at: www.epa.gov/e-Manifest. Ohio EPA created a registration video that is available in the right sidebar at https://epa.ohio.gov/derr/National-e-Manifest-System.

Stay Updated

Subscribe to the e-Manifest Listservs for the latest news and monthly webinar announcements:

- To subscribe to the general program Listserv, send a blank message to: eManifest-subscribe@lists.epa.gov
- To subscribe to the developers only Listserv, send a blank message to: e-manifestdev-subscribe@lists.epa.gov

For more information on U.S. EPA's e-Manifest Program and frequently asked questions:

- Go to www.epa.gov/e-Manifest

State Information

e-Manifest is a federal program. Any questions should be directed to U.S. EPA using the "Contact us" link on the e-Manifest web page unless it is related to user registration or EPA ID assignment, which are processed by Ohio EPA. For user registration help and a list of resources, go to http://epa.ohio.gov/derr/National-e-Manifest-System

If you need assistance with Ohio's Hazardous Waste regulations, go to http://epa.ohio.gov/derr/hazwaste.aspx

Regional Contacts

A list of U.S. EPA Regional contacts is available at https://www.epa.gov/e-manifest/forms.