e-Manifest Fact Sheet: Brokers

U.S. EPA has established a national system for tracking hazardous waste shipments electronically. This system known as “e-Manifest,” will modernize the nation’s cradle-to-grave hazardous waste tracking process while saving valuable time, resources, and dollars for industry and states. U.S. EPA is establishing 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

- Brokers will 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.
- Existing 6-copy manifest form is being replaced with a new 5-copy form. The new form was effective June 30, 2018. The old form can be used until supplies run out, but U.S. EPA recommends that a sticker be placed at the bottom of page 1 stating that this copy of the signed manifest must be sent to U.S. EPA.

Scope of e-Manifest

e-Manifest will facilitate 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),
- Conditionally Exempt Small Quantity Generator waste (if manifest required by state), and
- Imported hazardous waste.

U.S. EPA will implement 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.)

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

How Brokers Will Be Impacted

Because brokers may service multiple clients, U.S. EPA requires them to obtain an EPA ID Number. This will enable brokers to track their manifest activities in e-Manifest and make draft manifests available to their clients.

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 Form 9029 to obtain an EPA ID Number, and mark the Electronic Manifest Broker
Form 9029 is referred to as the Site ID Form and a fillable Microsoft Word version can be found at http://epa.ohio.gov/derr/hazwaste/notiform.aspx. You can submit the form electronically by registering for myRCRAid. Information about myRCRAid is on the same web page as Form 9029.

RCRAInfo Industry Application users who previously signed up for myRCRAid 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 My Site Permissions.

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 signing electronically need to go through identity proofing plus sign using a CROMERR-compliant electronic signature (e.g., password plus personal challenge question). 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 several options for submitting paper manifests to U.S. EPA, including mailing in paper manifests, sending a scanned image of a paper manifest or submission of image and data files via e-Manifest.

Brokers can utilize the 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.

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

Direct your questions to eManifest@epa.gov.

State Information

e-Manifest is a federal program. Any questions should be directed to U.S. EPA at the email link above unless it is related to user registration. For user registration help and a list of resources, go to http://epa.ohio.gov/derr/National-e-Manifest-System

To ask questions about user registration, send an email to RCRAInfoIndustry@epa.ohio.gov

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.