

# e-Manifest Fact Sheet: Generators

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 Generators Need to Know

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- e-Manifest launched nationwide June 30, 2018.
- Generators have the option to create and submit manifests electronically in e-Manifest.
- If generators would like to submit electronically, they must register for e-Manifest.
- Generators who wish to use electronic manifests will need an EPA Identification (ID) Number.
- Generators may continue to use paper manifests; however, use of e-Manifest is highly encouraged by U.S. EPA.
- The 6-copy manifest form has been replaced with a new 5-copy form. The new form became effective June 30, 2018.

## Scope of e-Manifest

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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.)

## How e-Manifest Impacts Generators

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- To use e-Manifest, generators need an EPA ID Number and to register with e-Manifest.
- If generators do not create e-Manifest accounts for viewing hazardous waste manifests, they should make arrangements with their receiving facilities to obtain paper copies of completed manifests per recordkeeping requirements in 40 CFR part 262. The e-Manifest system will only supply electronic copies of completed manifests to registered generators with e-Manifest accounts.

## What Generators Need to Do

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### **Work with Receiving Facility 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. 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, including uploading a scanned image of a paper manifest or submission of image and data files via e-Manifest.

Generators with e-Manifest accounts will be able to view manifests and participate in the electronic data corrections process supported by e-Manifest. Generators who wish to submit post-receipt corrections in e-Manifest will need to go through identity proofing plus sign using a "CROMERR-compliant" electronic signature (e.g., password plus personal challenge question). They will need to be a Site Manager or Certifier. U.S. EPA's Cross-Media Electronic Reporting Rule (CROMERR) provides the legal framework for electronic reporting under U.S. EPA's regulatory programs. Note: generators may only use electronic manifests if transporters and receiving facilities listed on the manifest are also registered for e-Manifest.

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

### **Obtain/Update EPA ID Number**

- Generators must have an EPA ID number to use e-Manifest. To obtain an EPA ID number in Ohio, generators can submit Ohio EPA's Site Identification form (EPA 9029) on paper or electronically using myRCRAid. Go to <https://epa.ohio.gov/derr/hazwaste/notiform> for more information.
- 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.
- For generators who already have an EPA ID Number, your previously submitted information (e.g., contact information) needs to be up to date. Check your site information on RCRAInfo Web at <https://rcrainfo.epa.gov/rcrainfoweb/action/main-menu/view>.

### **Register with e-Manifest**

Federal e-Manifest registration and instructions are available at: [www.epa.gov/e-Manifest](http://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>. Generators need to register for e-Manifest only if they will view, create, and/or sign manifests electronically or make corrections to manifests. Users can register for different permissions related to these tasks. Each user must register separately. Additionally, U.S. EPA encourages generators to register more than one Site Manager who, in addition to all the permissions above, can also approve other users in their company for e-Manifest access.

### **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](mailto:eManifest-subscribe@lists.epa.gov)
- To subscribe to the developers only Listserv, send a blank message to: [e-manifestdev-subscribe@lists.epa.gov](mailto: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](http://www.epa.gov/e-Manifest)

### **State Information**

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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 a user registration video 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**

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