e-Manifest Fact Sheet: TSDFs

EPA is establishing 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. 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 TSDFs Need to Know

- Treatment, Storage, and Disposal Facilities (TSDFs) will have the option to create and submit manifests electronically.
- TSDFs may continue to use paper manifests after June 30, 2018; however, use of e-Manifest is highly encouraged by EPA.
- TSDFs can use the e-Manifest system to meet manifest recordkeeping requirements under the Resource Conservation and Recovery Act (RCRA) regulations.
- TSDFs must submit all final manifests, whether paper or electronic, to EPA.
- EPA will charge a fee to TSDFs for each manifest submitted. Fees are differentiated based on how the manifest is submitted.
- Existing 6-copy manifest form is being replaced with a new 5-copy form. The new form will be effective starting on June 30, 2018.

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),
- Very Small Quantity Generator waste (if manifest is required)

- Imported hazardous waste.
- How TSDFs Will Be Impacted
- The e-Manifest Act mandates that the system must cover waste shipments for which either federal or state law require a RCRA hazardous waste manifest for their tracking. Shipments of state-regulated wastes that are not federal RCRA wastes, but that are subject to the hazardous waste manifest under a state law, must be included in the system regardless of the requirements of the destination state. Conversely, if a shipment is voluntarily shipped on a manifest (i.e. not required to be manifested under either state or federal law), these manifests are not required to be submitted to EPA.
- TSDFs must register with the e-Manifest system to receive and pay invoices for submittal of manifests to EPA. Registering with e-Manifest also allows TSDFs to view electronic copies of completed manifests, make corrections and minimize the costs of submitting manifests to EPA.
- Generators with account will also be able to participate in the electronic data correction process supported by e-Manifest.
- If generators do not create e-Manifest accounts for viewing manifests, TSDFs should make arrangements they should work with the TSDF to provide paper copies of completed manifests per the 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 TSDFs Need to Do

Work with Customers to Select Manifest Creation Option

e-Manifest allows for three types of manifest creation options:

- Paper (generator, transporter, and receiving facility all sign on paper)
- Hybrid (manifest is created electronically in e-Manifest. A hard copy is printed from the system and signed by the generator and initial transporter. The signed hard copy is left with the generator, while the remainder of the manifest shipment is executed in the electronic system. The manifest is signed electronically by the initial transporter, any subsequent transporters and the receiving facility.)
- Electronic (created in e-Manifest and electronically signed by all entities listed on the manifest)

Beginning on June 30, 2018, all TSDFs must submit manifests to EPA. Electronic and hybrid manifests are submitted to EPA instantaneously as they are signed electronically by the TSDF. EPA’s Cross-Media Electronic Reporting Rule (CROMERR) provides the legal framework for electronic reporting under 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 EPA within 30 days of receipt.

TSDFs can utilize the 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.

Select Manifest Submission Options and Associated Fee

TSDFs have several options for submitting manifests to EPA, each with an associated fee. The fee is based on manifest type and mode of submission:

- Mailed paper forms incur the highest fees.
- Scanned image file and data + scanned image file uploads will incur moderate fees.
- Electronic manifest, including hybrid manifest, will incur the lowest fees.

EPA user fees can be found on the e-Manifest website.

Register with e-Manifest

Registration and instructions are available at: www.epa.gov/e-Manifest. Users can register for different permissions related to whether they want to view, create, and/or sign manifests electronically. Each user must register separately. Additionally, EPA encourages TSDFs to register at least two “Site Managers” per EPA ID who, in addition to all the permissions above, can also approve other users in their company for e-Manifest access. Site Managers will receive and are responsible for paying monthly manifest invoices.

Pay Your Invoice

Site managers will receive an electronic invoice on the first day of the month. Payments can be made by clicking the “Pay Bill” button in the e-Manifest system.

Stay Updated

For more information on EPA’s e-Manifest Program and frequently asked questions: www.epa.gov/e-Manifest

State Information

For waste shipments initiated after June 30, 2018, Wisconsin Department of Natural Resources (DNR) will no longer be requiring monthly submittals of manifest reports, as the state will use the e-manifest system to view manifests. In addition, manifest fee collection is transferred to the EPA.

e-Manifest registration instructions

DNR grants permission for user access to the e-manifest system for Wisconsin facilities. DNR’s hazardous waste manifest web page explains the process to register to use the e-manifest system. https://dnr.wi.gov/topic/Waste/Manifest.html

Activity notification changes Instructions on how to access and submit the electronic form 8700-12 are found on the DNR Hazardous Waste Overview page at: http://dnr.wi.gov/topic/Waste/Hazardous.html

State Contacts

User access issues for MyRCRAid and e-Manifest: contact DNR’s Aggie Cook at Agnes.Cook@wisconsin.gov, 608/266-2414 or Adan Lara at Adan.Lara@wisconsin.gov.

Regional EPA Contacts

- e-Manifest compliance questions can be directed to Dan Chachakis at Chachakis.Daniel@epa.gov or 312/886-9871.
- e-Manifest IT assistance issues can be directed to Thomas Crosetto at Crosetto.Thomas@epa.gov or 312/886-6294.