

E-Manifest: EPA's New Hazardous Waste Electronic Tracking System June 20, 2018 - Webinar Questions and Answers

1. Can you repeat how CESQGs will sign the manifest generated by the transporter?

The hybrid or mixed paper/electronic manifest is a specific manifest approach that EPA adopted to assist generators who are not able to fully participate in electronic manifesting at the time of system launch. The hybrid manifest allows transporters to initiate an electronic manifest in e-Manifest and use this manifest with their generator customers. The initial transporter may print a copy of the electronic manifest for the generator, and the generator may sign the paper copy, obtain the initial transporter's ink signature on this paper copy, and then retain this paper copy on-site as the generator's initial manifest copy as is done under traditional manifest requirements. Thereafter, the initial transporter and subsequent waste handlers will complete the remainder of the tracking of the shipment electronically in e-Manifest with electronic signatures and electronic transmissions to the system. Hybrid manifests are charged the same fee as a fully electronic manifest.

2. Do all generators in Nevada need to request that the TSDF send a paper copy of the manifest so the generator can submit it to the state?

Generators will need to register with e-Manifest and create an account where they can view their manifest copies when they are signed and submitted as final manifests by the receiving facility, or, they will need to make special arrangements with the receiving facility to obtain a signed paper copy from the facility. NAC 444.8655 requires generators shipping waste outside of Nevada to mail a copy of the final manifest to the NDEP. With the new e-Manifest system, the NDEP will be able to see manifest data in the e-Manifest system and this regulation will likely be deleted in future amendments to the hazardous waste regulations.

3. Will the requirement to submit signed copies of manifest going to out of state facilities be going away?

Yes, NAC 444.8655 will be deleted in the future (approximately 16-18 months) upon approval of the Nevada State Environmental Commission.

4. As a transporter/broker do we have to register as a site manager for sites to create/manage e-Manifest for them?

Upon registering in the [RCRAInfo Industry Application](#), a transporter must select site(s) by EPA ID Number in order to obtain permission to sign a manifest for that site. The transporter must register as a Certifier in the e-Manifest module to sign a manifest electronically. A broker may prepare manifests in e-Manifest for its generator clients. Because a broker may service multiple clients, EPA requires that brokers obtain an EPA ID Number using the Site ID Form (EPA Form 8700-12) so that manifest activities may be tracked. However, a broker may not sign manifests in e-Manifest on behalf of generator clients, unless the broker is operating at the generator site and can sign the manifest as an offeror of the waste shipment.

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5. You mentioned that e-Manifest is for going paperless. Also, it was noted that drivers must still carry a paper copy in the vehicle. Does that mean that we need to be creating both paper and doing an e-Manifest if we are the generating facility?

A paper copy must be carried in the vehicle to meet DOT emergency response requirements. The transporter will be responsible for creating this document to carry in the transport vehicle.

6. Can you print a copy of the e-Manifest?

Yes, you can print a copy of an e-Manifest. See the print feature on the screen.

7. Do CESQGs need to register and use the e-Manifest system?

Yes, CESQGs need to register in the RCRAInfo Industry Application if they want to track their waste shipments and/or make corrections to their manifests.

8. If you are in charge of multiple sites in different states do you have to register for each state or just once to EPA?

You may obtain one user account through the RCRAInfo Industry Application and select your sites via EPA ID Number in each respective state that they are located in.

9. If we are a SQG, do we work with our receiving company to determine our e-Manifest type and then will they send the final e-Manifest information?

Yes, please work with your receiving facility to determine which type of manifest will be used. If you sign up as a viewer in the e-Manifest module of the RCRAInfo Industry Application, you will be able to see your manifest data as it moves through the e-Manifest system. If you do not register for e-Manifest, then you will need to wait 90 days until EPA HQ posts the manifest data for public access.

10. Do I need a site manager for each facility, or can one site manager register for the whole business?

One site manager can select multiple sites via EPA ID Number. A site manager can create, update, and/or certify/submit data across all modules of the RCRAInfo Industry Application and manage other users at their site. EPA suggests the site manager should have a role which includes general management, human resources, accounting, or IT services within the company. The site manager can see billing info for the manifests received by EPA HQ. Additionally, the site manager can obtain an API key for system-to-system interactions with RCRAInfo.