National e-Manifest System

Background

The United States Environmental Protection Agency (EPA) is currently developing a national electronic manifest (e-Manifest) system that will facilitate the tracking and transmission of the EPA uniform hazardous waste manifest form using a web browser. This system will be implemented by the EPA in partnership with industry and states. The new system will be designed to make manifesting more effective and convenient for users. Paper manifesting will still be allowed under this new system, however, the cost of using paper manifests will be higher than using electronic manifests. For paper manifests, a newly revised version of the paper manifest form will be required (a new 5-copy manifest will be used instead of the old 6-copy manifest). The e-Manifest system will launch on June 30th, 2018.

How the Regulated Community Can Prepare for e-Manifest

The regulated community can prepare themselves for the new e-Manifest system by taking advantage of the various outreach materials provided by EPA.

EPA conducts monthly webinars related to the development and progress of the e-Manifest system initiative; archived copies of previous e-Manifest webinars are located on the same webpage. EPA’s e-Manifest team provides updates through the EPA e-Manifest listserv and EPA Monthly Update webpage. These updates cover a range of topics including system development, implementation, and various meetings and workshops. You can access these updates by subscribing to EPA’s e-Manifest listserv (send a blank e-mail to eManifest-subscribe@lists.epa.gov to subscribe) or visiting EPA’s e-Manifest Monthly Update webpage.

Testing (Optional): EPA is allowing users to test early versions of the e-Manifest system and has provided information about registering test accounts and the testing process on their website. *Note: test accounts will not work with the final system. Anyone who wants to use the final system will be required to create another account in the RCRAInfo production system*.

Verify Your Site Information (Recommended): It is recommended that you use RCRAInfo Web to verify that the EPA ID number, site name, location address, mailing address, and contact phone number that are associated with your site are correct. The information associated with your site in RCRAInfo will be used on your electronic manifests in the e-
Manifest system, so it is important that the information in RCRAInfo is correct. Site information can be updated in the myRCRAid module of the RCRAInfo Industry Application (App).

**Site Identification (ID) Numbers:** North Dakota's Hazardous Waste Program (Program) issues the EPA ID numbers for sites located in North Dakota. EPA ID numbers are assigned to a site's physical location (an EPA ID number does not transfer with the handler if the handler moves to a different site). Small quantity generators (SQGs), large quantity generators (LQGs), and treatment, storage, and disposal facilities (TSDFs) are required to have an EPA ID number. For more information about North Dakota site locations, please see NDDoH's webpage on obtaining EPA ID numbers or call the Program at (701) 499-5207.

**Communicate with Transporters and Receiving Facilities (Recommended):** Generators will need to communicate with their selected transporters and receiving facilities (e.g., TSDF, recycler, etc.) to decide who will be responsible for creating new manifests and whether paper or electronic manifests will be used; this will help to prevent duplicate manifests for the same shipment.

Receiving facilities will be responsible for the submittal of final, signed manifests to the e-Manifest system and the payment of associated fees. It is recommended that generators and transporters contact their receiving facilities for available participation options and costs under the new system.

**Receiving facilities**
Receiving facilities **must** have a RCRAInfo Industry App account prior to the e-Manifest system launch. Receiving facilities who receive wastes that require the use of a hazardous waste manifest (federal hazardous wastes, state-only hazardous wastes, etc.) are **required** to have an EPA ID number to use the e-Manifest system, even if the facility is not obligated to have an EPA ID number under state Rules.

If a receiving facility has an EPA ID number and is registered for e-Manifest, but is not available to be selected as the "designated facility" on an electronic manifest the facility may need to be added to e-Manifest by the Program. In this case, the facility should contact and request that their facility be added to e-Manifest by sending an email to croob@nd.gov with the subject "e-Manifest: Add Facility" (the facility's EPA ID number should be included in the email).
Receiving facilities will be **required** to submit all final manifests to the e-Manifest system. There will be a fee for each final manifest that a receiving facility submits to the e-Manifest system and each receiving facility will be billed on a monthly basis. See the e-Manifest User Fee Rule FAQ for more information. Receiving facilities accepting wastes that are **state-only hazardous wastes** will be required to submit final manifests to the e-Manifest system. This includes wastes that are **state-only hazardous wastes in the state where the waste was generated**.

**Transporters**
Transporters **must** have an EPA ID number. Transporters should be identified as a **Transporter of Hazardous Waste** in RCRAInfo (Item 11.A.1.a. on the EPA Site ID Form 8700-12; can be updated in myRCRAid module). Transporters may verify their hazardous waste transporter activity using RCRAInfo Web. Transporters will need to obtain a RCRAInfo Industry App account if they wish to access and sign electronic manifests using the e-Manifest system web-submittal software.

**Note:** Transporters of hazardous waste that pick up from or deliver to locations in North Dakota must have a valid Solid Waste Transporter permit issued by the North Dakota Department of Health Solid Waste Program. Please see NDDoH's Waste Transporter page for more information.

**Generators**
Generators will need to obtain a RCRAInfo Industry App account if they wish to access and sign electronic manifests through the e-Manifest system web-submittal software. If generators intend to meet the manifest recordkeeping requirements by storing their manifests in the e-Manifest system, they will need to obtain a RCRAInfo Industry App account and have access to their site in e-Manifest.

Completely paperless (electronic) manifesting is the lowest cost e-Manifest option. If a generator wishes to use completely electronic manifests, then the generator must select a transporter and a receiving facility that are also able to use completely electronic manifests. **Note:** all records for completely electronic manifests will only be accessible through RCRAInfo, which requires internet connectivity.
**Manifest Corrections**

Users who wish to correct paper manifests may correct those manifests on paper *prior* to the receiving facility submitting them to EPA's e-Manifest processing center, or electronically *after* the paper manifest has been submitted to e-Manifest. Paper based corrections *cannot* be made after a paper manifest is submitted to e-Manifest. Users who wish to correct hybrid or electronic manifests can only correct those manifests electronically. **Note:** EPA has stated that users will not have the ability to correct manifests electronically until Fall 2018.

**e-Manifest Fee Schedule**

EPA issued the Final Rule: User Fees for the E-Manifest System and Amendments to Manifest Regulations (User Fee Rule) on January 3rd, 2018. This rule created the initial fee schedule for users of the e-Manifest system. The e-Manifest fees incurred by the regulated community will be based upon the method used to collect the manifest data (e.g., paper or electronic). **EPA is only imposing user fees upon receiving facilities.** Receiving facilities will be assessed a fee for each final manifest that they submit to the e-Manifest system and will be billed on a monthly basis. EPA will revise the fee schedule every two years to ensure that the fees charged to the regulated community reflect the cost of running the e-Manifest system. See the e-Manifest User Fee Rule FAQ for more information.

**FAQs**

**Federal:**

*Where can I get additional information about e-Manifest?*

EPA e-Manifest General FAQ
EPA e-Manifest User Fee Rule FAQ

General e-Manifest questions (federal requirements, software design and development, etc.) should be directed to EPA via email sent to: eManifest@epa.gov.

**State:**

*Are there any additional requirements in North Dakota under this new system?*

Yes, NDDoH will continue to require the following:

- Generators must continue to submit a copy of the generator copy of hazardous waste manifest forms to the Program if the generator uses paper manifests to ship hazardous waste. The Program will evaluate the necessity of this requirement after the EPA e-Manifest system has been operating for a reasonable period of time. Generators who use the EPA e-Manifest system for entire manifest transactions (electronic manifest from
the generator to the receiving facility) will not be required to submit a paper copy of the electronic manifest forms to the Program. Instead, the Program will have access to the manifest data in the EPA e-Manifest system.

**Fact Sheets**

**Note:** The following fact sheets are current as of June 14, 2018; any changes to federal e-Manifest requirements after that date will not be reflected in these fact sheets. Please see EPA's e-Manifest Stakeholder Fact Sheets for any new or updated federal requirements. North Dakota requirements in the following fact sheets are current and fact sheets will be re-issued if the Program modifies North Dakota requirements under e-Manifest.

- e-Manifest Broker Fact Sheet (PDF, 230 KB, 3 pages)
- e-Manifest General Public Fact Sheet (PDF, 186 KB, 2 pages)
- e-Manifest Generator Fact Sheet (PDF, 222 KB, 3 pages)
- e-Manifest Receiving Facility Fact Sheet (PDF, 239 KB, 3 pages)
- e-Manifest Transporter Fact Sheet (PDF, 231 KB, 3 pages)
- e-Manifest TSDF Fact Sheet (PDF, 231 KB, 3 pages)

**Contact Information for North Dakota**

**Hazardous waste manifest forms and related correspondence should be mailed to:**
ND Department of Health
Division of Waste Management
1120 28th Avenue North, Suite B
Fargo, ND 58102

**Contact Information:**
Chris Roob
Phone: (701) 499-5207
E-Mail: croob@nd.gov

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