

## e-Manifest Fact Sheet: Polychlorinated Biphenyl Waste Handlers

On June 30, 2018, 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. EPA established e-Manifest per the Hazardous Waste Electronic Manifest Establishment Act. Manifesting of regulated PCB waste is required under the Toxic Substances Control Act regulations ([40 CFR part 761](#)).

### What PCB Handlers Need to Know

- All PCB manifests and continuation sheets, whether paper or electronic, must be submitted to EPA’s e-Manifest system by the receiving facility.
- PCB waste handlers can use one of the following types of hazardous waste manifests:
  1. Paper (generator, transporter, and receiving facility all sign on paper).
  2. Hybrid (created in e-Manifest, printed and signed on paper by the generator and initial transporter and then is signed electronically by subsequent transporter(s) and the receiving facility).
  3. Electronic (created in e-Manifest and electronically signed by all entities listed on the manifest).
- EPA charges receiving facilities a fee for each manifest submitted to EPA’s e-Manifest system. EPA publishes user fees on the [e-Manifest website](#).
- Generators, commercial storers, transporters, and disposers of PCB waste have the option to use electronic manifests in e-Manifest system. To do so, all PCB handlers named on a manifest need a RCRA-issued EPA identification (ID) number and must register with e-Manifest.
- Generators who do not register for e-Manifest may use the hybrid manifest option and make arrangements with their receiving facilities to obtain paper copies of completed manifests per 40 CFR part 761, subpart K.
- Transporters must still carry a paper copy of electronic manifests on the transport vehicle per

- Department of Transportation (DOT) shipping paper requirements by printing a copy from e-Manifest.
- Receiving facilities and registered generators can use the e-Manifest system to meet manifest recordkeeping requirements under RCRA and TSCA regulations.
  - Manifest information in e-Manifest is released to the public 90 days after submission to the system.

### PCB Manifest Waste Categories

Effective February 26, 2024, the PCB waste categories for the manifest under 40 CFR 761.207(a) are:

1. Bulk load of PCBs
2. PCB Transformer
3. PCB Large High or Low Voltage Capacitor
4. PCB Article Container
5. PCB Container
6. Other (e.g., small capacitors, circuit breakers, PCB-contaminated transformers, pipeline)

### What PCB Wastes Need Manifests

Unless specifically exempted from the requirements in 40 CFR, part 761 subpart K, the PCB regulations require generators to prepare a manifest and, if necessary, a continuation sheet prior to transporting regulated PCB waste (*see* 40 CFR 761.207). PCB wastes regulated under TSCA include the following, which are defined in 40 CFR 761.3:

- PCB Articles (e.g., capacitors, transformers, electric motors, pump, pipes, and certain other manufactured items)
- PCB Equipment (e.g., microwave ovens, electronic equipment, and fluorescent light ballasts and fixtures)

- PCB Containers (any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs)
- PCB Article Containers (any package, can, bottle, bag, barrel, drum, tank, or other device used to contain PCB Articles or PCB Equipment, and whose surface(s) has not been in direct contact with PCBs)
- PCB remediation waste (waste containing PCBs as a result of a spill, release, or other unauthorized disposal at certain concentrations)
- PCB bulk product waste (waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration where the concentration at the time of designation for disposal was  $\geq 50$  ppm PCBs)
- Waste shipped to be tested for the presence of PCBs, regardless of final PCB content determination.
- PCB wastes required by state regulation to be shipped on a manifest. A helpful table of state codes is located at the [EPA's e-Manifest FAQs](#).

## Actions for PCB Waste Handlers

### Use Manifest for Federal or State-Regulated PCB Waste Shipments

Components of a PCB manifest include:

- The manifest ([EPA Form 8700-22](#)); and
- Continuation sheet(s), if necessary.

EPA Form 8700-22A can be used as PCB manifest continuation sheet but is not a mandatory form. All PCB continuation sheets, whether using EPA Form 8700-22A or not, must be submitted to EPA's e-Manifest system by the receiving facility.

Some waste containing PCBs that is not regulated for disposal under TSCA federal regulation (e.g., transformers containing  $< 50$  ppm PCBs) may be regulated by states and required to be shipped on the EPA manifest EPA Form 8700-22.

### Submit Final Manifests to e-Manifest

Receiving facilities must submit manifests and all continuation sheets for shipments of federal or state-regulated PCB waste to EPA's e-Manifest system and pay the requisite user fee.

### Consider Obtaining a RCRA-issued EPA ID Number

PCB handler facilities must have a RCRA-issued EPA ID number to register for the e-Manifest system, retrieve

and correct manifests stored in e-Manifest, and use electronic manifests. A RCRA-issued EPA ID number is *not* a TSCA-issued EPA ID number; to obtain a RCRA-issued EPA ID follow the instructions on [our state contacts website](#).

Facilities who manifest both RCRA hazardous waste and TSCA PCB waste may use their RCRA-issued EPA ID for both RCRA and TSCA purposes by indicating this request to EPA when submitting [Form 7710-53](#) (see 40 CFR 761.202).

Generators can continue to use their TSCA-issued EPA ID number or the generic identification number "40 CFR PART 761" on hybrid or paper manifests to meet manifesting requirements (see 40 CFR 761.205(c)(1)); however, these generators will not be able to access and retrieve these manifests in e-Manifest and thus cannot use the system for recordkeeping purposes.

### Register for e-Manifest

Once a PCB handler facility has a RCRA-issued EPA ID, PCB handlers can register for e-Manifest at: [www.epa.gov/e-manifest/e-manifest-user-registration](http://www.epa.gov/e-manifest/e-manifest-user-registration).

Once registered, PCB waste generators and transporters can create, edit, view, and sign electronic manifests as well as submit post-receipt corrections electronically on any manifest (paper or electronic). Receiving facilities can create, edit, view, sign, submit electronic manifests, upload and submit paper manifests to EPA, make post-receipt corrections to submitted manifests, and retrieve copies of manifests submitted.

### Stay Updated

For more information on EPA's e-Manifest Program go to: [www.epa.gov/e-Manifest](http://www.epa.gov/e-Manifest)

- Attend the next [e-Manifest webinar](#)
- Subscribe to the e-Manifest mailing lists:
  - General Program: [Click here to subscribe](#)
  - Software Developers: [Click here to subscribe](#)
- Access to training materials can be found [here](#).
- For more information on EPA's PCB Program, go to: [www.epa.gov/pcbs](http://www.epa.gov/pcbs)
- Useful question and answer documents:
  - [PCB Q&A Manual](#)
  - [e-Manifest FAQ](#)
- Contact Us about the [Hazardous Waste Electronic Manifest System](#)
- Contact your [Regional PCB Coordinator](#)
- Contact EPA's Headquarters PCB inbox at: [ORCRPCBs@epa.gov](mailto:ORCRPCBs@epa.gov)