

# e-MANIFEST

## ISSUE SUMMARY:

For more than 30 years, the RCRA manifest requirement to track shipments of hazardous waste had been a paper-intensive process that requires handling of approximately two million paper manifests each year, presenting a substantial paperwork burden for industry and regulators. e-Manifest is EPA's national system for tracking hazardous waste shipments electronically. This system modernizes the nation's cradle-to-grave hazardous waste tracking process while saving valuable time, resources, and dollars for industry and states. By enabling the transition from a paper-intensive process to an electronic system, the EPA estimates e-Manifest will ultimately save state and industry users more than \$50 million annually, once electronic manifests are widely adopted.

## UPCOMING MILESTONES:

- **January 2025**—Recent amendments to the manifest regulations take effect, including requirements for certain users to register for the e-Manifest system.
- **July 2025** – By July 1, 2025, EPA must publish its revised user fees for the FY2026/2027 user fee cycle.
- **December 2025** – e-Manifest begins to collect export manifests and other manifest-related reports.

## BACKGROUND:

Manifest tracking has been a key component of the Resource Conservation and Recovery Act (RCRA) to ensure that hazardous waste shipped off-site by generators is received by the facility designated by the generator for final treatment, storage, or disposal. This tracking is enabled via the Uniform Hazardous Waste Manifest form, which must be signed by the generator, each transporter, and the final receiving facility.

The e-Manifest system was established per the Hazardous Waste Electronic Manifest Establishment Act, which was enacted into law on October 5, 2012. EPA launched the e-Manifest system on June 30, 2018, to serve as a national hub for all manifests and to provide several benefits including: accurate and more timely information on waste shipments, rapid notification of discrepancies, increased effectiveness of compliance monitoring, and potential for integrating manifest reporting with the RCRA biennial reporting process.

All manifests for which either federal or state law requires a RCRA hazardous waste manifest must be submitted, by the receiving facility, to the e-Manifest system. The three manifest types are “scanned image upload”, “scanned image plus data file”, and “data file only electronic manifests.” Use of “data file only electronic manifests” is optional but highly encouraged by EPA; currently “data file only electronic manifests” account for less than a half percent of all manifests received. EPA is taking several actions, both regulatory and non-regulatory, to encourage more users to use the “data file only electronic manifests” since greater adoption of those would improve data quality and increase cost savings to the regulated community.

The e-Manifest Act requires EPA to recover, through user fees, all costs related to development and implementation of e-Manifest. EPA charges user fees to receiving facilities for each manifest submitted, and differentiates fees based on manifest submission type. EPA updates user fees every two years in accordance with the user fee calculation methodology in 40 CFR 264/265 subpart FF.

In addition, the e-Manifest Act requires EPA to establish a Hazardous Waste Electronic Manifest System Advisory Board that meets annually. This Advisory Board, established in accordance with the Federal Advisory Committee Act, provides recommendations on matters related to the operational activities, functions, policies, and regulations for the system.

#### KEY EXTERNAL STAKEHOLDERS:

☐ Congress      ☒ Industry      ☒ States      ☐ Tribes      ☐ Media      ☒ Other Federal Agency  
☐ NGO      ☐ Local Government      ☐ Other: \_\_\_\_\_

Industry as well as state regulators have expressed appreciation for e-Manifest system particularly as a clearinghouse for their data submissions which are being utilized on all sides to better understand and improve hazardous waste handling. However, multiple stakeholder groups (both regulatory and industry) have reported numerous and persistent errors associated with industry submission of paper manifests. EPA is working alongside those groups to triage data quality errors; however, to best resolve these issues, EPA continues to work to implement electronic manifests.

Stakeholders have expressed concerns regarding significant barriers to adopting electronic manifests, such as identify proofing and two-factor authentication requirements, adopted under the Cross Media Electronic Reporting Rule (CROMERR) and Department of Transportation regulations that require handlers to carry a hard copy of the manifest during transport to facilitate emergency response.

In response to the industry concerns regarding the logistical challenges of implementing electronic manifests, such as internet access, employee registration and signature requirements, and integration with their company systems, the EPA has worked to establish and implement a remote signer policy that addresses user needs.

#### MOVING FORWARD:

- Supporting implementation of new regulatory requirements in 2025 to register users, incorporate export manifests, and collect other manifest-related reports.
- Publish user fees for the upcoming FY 2026/2027 fee cycle by July 1, 2025.
- Convene Advisory Board in 2025.

LEAD OFFICE/REGION: OLEM

OTHER KEY OFFICES/REGIONS: ALL REGIONS,  
OMS, OCFO, OGC, OECA