



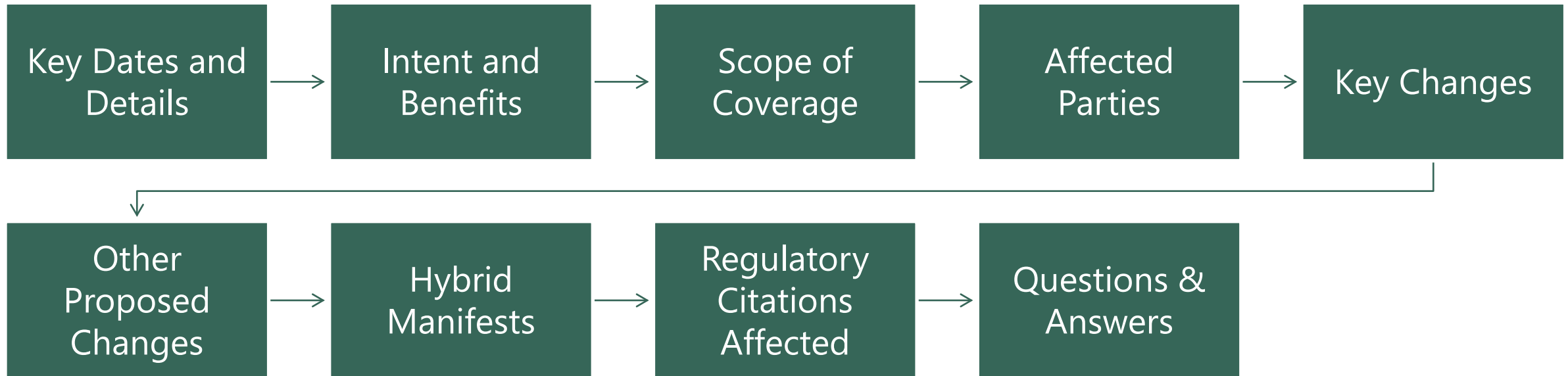
# ***e-Manifest***

Quarterly Webinar Series

March 25, 2026



# Agenda



## Key dates and details

### Publication Date:

- March 5, 2026

### Federal Register Citation:

- 43 *FR* 10862

### Comment Period Ends:

- May 4, 2026 (60-day comment period)

### Action Needed:

- You may send comments to Docket ID No. [EPA-HQ-OLEM-2025-3456](#), via the Federal eRulemaking Portal.

# Intent and benefits

The shift to electronic manifests aims to provide real-time visibility into hazardous waste activities, which will improve data quality and operational efficiency.

Additionally, this transition offers greater transparency and oversight, which are essential for ensuring regulatory compliance and protecting the environment.

## Scope of paper sunset rule

No expansion of  
entities subject to  
manifesting

Current non-  
manifested waste  
remains  
unchanged

# Who is affected

## ■ **Impacted Entities:**

- Large Quantity Generators (LQGs)
- Small Quantity Generators (SQGs)
- Very Small Quantity Generators (VSQGs) managing hazardous waste from episodic events
- Hazardous waste transporters
- Treatment, Storage, and Disposal Facilities (TSDFs)
- Healthcare facilities and reverse distributors
- Generators, transporters, storers, and disposers of PCB waste

## Key changes at a glance

Paper Sunset Date: Under the proposed rule, all shipments initiated 24 months after the final rule would be required to use electronic manifests.

Limited use of paper manifests would be allowed during outages of the EPA's e-Manifest system.

# Key Changes (continued) - Registration and ID Assignment for PCB Waste

*e-Manifest*

## Mandatory Registration:

- Required for all regulated entities using a manifest, including generators and transporters of PCB waste.

## TSCA-issued EPA ID:

- Mandatory for all PCB waste generators, even those currently exempt.

## Notification Requirement:

- Exempt generators must notify EPA using EPA Form 7710-53 by the paper sunset date.

## Elimination of Generic ID:

- "40 CFR PART 761" generic ID phased out.
- Unique ID required for e-Manifest system compatibility.

## Importance of Registration and ID:

- Essential for accurate tracking, data corrections, and electronic exception reporting.
- Foundational for electronic manifesting participation.

# Key Changes (continued) Recordkeeping Transition to e-Manifest (Pre- and Post-Paper Sunset)

## *e-Manifest*



All manifest records would be captured and retained within the e-Manifest system.



Before paper sunset: Regulated entities could continue to track shipments using paper manifests.

Entities would be required to keep paper copies until those copies are uploaded by the receiving facility and accessible in registered accounts.



After paper sunset: Legacy paper-based recordkeeping requirements end; all manifest records are captured and retained in e-Manifest.



Electronic manifests satisfy record retention obligations and provide immediate access via registered accounts.

# Other proposed changes

## PCB Annual Reports:

- Transition to electronic submissions.
- Eliminates need for physical address submissions.
- Reports directed to the Director of the Office of Resource Conservation and Recovery (Technical Correction).
- Enhances flexibility and compliance.

## Exception Reports:

- Standardized electronic submission for healthcare facilities and reverse distributors.
- Aligns with requirements for Large and Small Quantity Generators.
- Healthcare facilities: Submit if no signed manifest in 60 days.
- Reverse distributors: Contact transporter/facility in 45 days; submit report if no manifest in 60 days.

## Confirmation of Delivery (Hazardous Waste Pharmaceuticals):

- Follow-up period extended from 35 to 45 days.
- Ensures proper tracking and documentation.
- Applies to potentially creditable hazardous waste pharmaceuticals.
- Offers increased flexibility and oversight.

# Hybrid Manifests



## **Availability:**

Hybrid manifests remain an option.  
Allows for a printed copy to be signed.



## **Retention:**

Printed copies must be retained for three  
years.

# Regulatory Citations Affected

## Overview:

- Numerous regulatory sections impacted by the transition to electronic manifests.
- Includes definitions, generator requirements, and transporter regulations.

## Key Sections:

- **Definitions:** § 260.10
- **Large and Small Quantity Generators:** §§ 262.20, 262.21, 262.24, 262.23, 262.40, 262.42, 262.232
- **Hazardous Waste Exporters:** § 262.83
- **Hazardous Waste Importers:** § 262.84
- **RCRA Transporter:** §§ 263.20, 263.22
- **Permitted Facilities (Part 264):** §§ 264.70, 264.71, 264.72, 264.76, 264.1310
- **Facilities with Interim Status (Part 265):** §§ 265.70, 265.71, 265.72, 265.76, 265.1310
- **Standardized Permits (Part 267):** §§ 267.71, 267.72
- **Healthcare Facilities (40 CFR Part 266, Subpart P):** §§ 266.502, 266.508, 266.509, 266.510
- **Reverse Distributors (40 CFR Part 266, Subpart P):** §§ 266.508, 266.510, 266.509
- **Generator of PCB Waste:** §§ 761.202, 761.207, 761.208, 761.210, 761.214
- **Transporter of PCB Waste:** §§ 761.207, 761.208, 761.214
- **Commercial Storer and Disposer of PCB Waste:** §§ 761.207, 761.208, 761.213
- **Other Changes to Part 761:** §§ 761.3, 761.208, 761.217, 761.218, 761.219, 761.66, 761.180, 761.202, 761.205, 761.207, 761.214, 761.210, 761.213, 761.215, 761.216

## Q & A

- Please enter any questions into the chat.
- Reminder: comments on the rule should be entered into the docket

