



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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e-Manifest Fact Sheet

On June 30, 2018, the USEPA's e-Manifest system became available for tracking the transportation and disposal of wastes previously manifested using the 6-part paper manifest. Detailed information and links to USEPA's Frequently Asked Questions may be found at [The Hazardous Waste Electronic Manifest \(e-Manifest\) System | US EPA](#). The following information is derived, in part, from USEPA's e-Manifest fact sheet, with additional specific information for Illinois' generators and receiving facilities.

Following the implementation of the e-Manifest system, any facility that receives waste that must be accompanied by a Uniform Hazardous Waste Manifest, such as RCRA and PCB wastes, may submit manifests in a variety of forms and pay the appropriate fee based on the selected form of submission. Transporters and generators should verify with the receiving facility which submission method is to be used in advance of transporting waste. One paper manifest must continue to be on the truck to comply with USDOT requirements.

The e-manifest is the legal equivalent of a paper manifest. Electronic submission satisfies requirement of handwritten signature, to keep or retain a copy, or provide to states or other "person." Receiving facilities that are regulated primarily at the state level, including facilities like POTWs, must submit manifests to USEPA within 30 days of waste receipt.

E-Manifest Users

Receiving facilities must use the e-Manifest system to track any federally regulated and state-regulated waste for which a Uniform Hazardous Waste Manifest is required. Accordingly, all receiving facilities, including facilities regulated primarily at the state level such as POTWs, must have a USEPA ID number and an e-Manifest user account. The use of the e-Manifest system will require receivers to close out and submit manifest copies to generators for state regulated wastes even if the receiving facility is not in that state, which is a change from past practice. Non-manifest documents, such as LDR notices, are not included in the e-Manifest system and should not be sent to USEPA. A facility that receives waste from a generator that does not elect to set up an e-Manifest system account must send a copy of the manifest to the generator upon receipt of the waste. This requirement may be satisfied by electronically sending the generator an imaged copy of the manifest; paper is not required.

Generators and transporters may continue to use paper manifests and, therefore, are not required to create an e-Manifest user account. However, an e-Manifest user account and USEPA identification number are necessary to create e-Manifests, sign manifests electronically, store and view e-Manifests, or correct manifests following waste receipt. USEPA identification number are obtained by completion of the 8700-12 form. Information to obtain a USEPA ID can be found on the IEPA website: [Generator Identification Numbers and Manifests \(illinois.gov\)](#). Generators and transporters that do not have an e-Manifest user account may maintain a copy of the signed paper manifest or an imaged manifest received electronically. Generators do not have to have a Site Manager, but we recommend having a Site Manager to gain benefits of manifest storage.

Brokers will have to have a USEPA identification number to create a manifest. However, to sign the manifest, the broker must be on-site, perform the pre-transportation functions, and have personal knowledge of the facts underlying the generator certification. There is a new box on the new 8700-12 for brokers to obtain a number.

Manifest Options

EPA accepts four types of manifest submissions, which include:

1. Fully Electronic
2. Hybrid
3. Data + Image
4. Scanned Image

Updated e-Manifest user fees and payment information can be found on the USEPA website: [e-Manifest User Fees and Payment Information | US EPA](#)

Signature Process

The e-Manifest signature process uses a CROMERR-compliant procedure for the Site Manager, Viewer, Preparer, and Certifier. IEPA will approve one site manager for each entity using the e-Manifest system and that Site Manager will be able to approve other users in their organization. USEPA recommends each site maintain at least two Site Managers for each USEPA identification number. One approved Site Manager can approve another Site Manager for that location, and can approve Viewers, Preparers, or Certifiers and can remove someone who leaves the organization or changes jobs. This is an enhanced permission and USEPA recommends a company officer or a senior manager for the role. A consultant may become a Site Manager or have other roles; however, the consultant must provide written authorization from the company before IEPA will approve any requests (although a company Site Manager may do so).

Industry users can sign up for permissions at multiple sites within a single state. Illinois EPA must approve the Site Managers for sites in Illinois. Electronic signature approval is a separate process that must be done (using Lexis/Nexis). An individual may try 3 times in 24 hours if they fail first approval, try later, or submit paper.

Obtaining Identification Numbers

Any entity that uses the entirely electronic or hybrid e-Manifest must have a USEPA identification number. If you need to obtain a number, information can be found on the IEPA website: [Generator Identification Numbers and Manifests \(illinois.gov\)](#).