



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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e-Manifest Fact Sheet for Illinois Companies

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. Links to USEPA's Frequently Asked Questions and to register for the e-manifest system may be found at <https://www.epa.gov/e-manifest/e-manifest-user-registration>. 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.

Illinois law requires non-hazardous Special Waste (<https://www2.illinois.gov/epa/topics/waste-management/waste-disposal/special-waste/Pages/default.aspx>) to be manifested using a form prescribed by the Illinois EPA. This manifest does not need to be submitted to US EPA's e-Manifest system.

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 is necessary to create e-manifests, sign manifests electronically, store and view e-manifests, or correct manifests following waste receipt. This also requires completion of the 8700-12 to have a number in RCRA info, in the comments section state that you need a number to use the e-manifest system for Illinois special waste. 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

USEPA has developed five tiers of e-manifest fees. The means of signing the completed manifest dictates which of the five tiers is applicable, so the receiving facility is ultimately responsible for determining which of the five tiers is available to transporters and generators that ship wastes to that facility. USEPA will revisit these fees every two years.

1. Electronic signatures. Electronic manifests can be initiated by receiving facility, generator, broker, or transporter prior to pick up using an ELC manifest number from the USEPA website. Waste that is in transit will be listed as "ready for signature" in the e-manifest system. Waste that arrives at a receiving facility without issue will be designated as "received". A paper copy is to be printed to accompany the waste during transit.

1a. Entirely electronic manifest requires (i) the generator must have an e-manifest account for the person signing the manifest, (ii) the transporter must have an Internet-enabled device on its vehicle and each driver must be registered, and (iii) the pick-up *location* has to have access to the e-manifest system. These manifests are signed electronically by each entity. The fee for entirely electronic manifests is \$5 per manifest.

1b. Hybrid manifest: Generators that do not obtain access to the e-manifest system may sign a paper manifest that is carried by the transporter. The generator must retain a copy of the signed manifest with the wet ink signature for the required manifest retention period. The manifesting process will otherwise mirror the entirely electronic process with electronic signatures by transporter and receiving facility and electronic transmissions to USEPA. The fee for hybrid manifests is \$5 per manifest.

2. Paper Manifest. Three paper manifest options are available. Each option will require the use of the manifest number preprinted on the 5-part paper manifest. Information from paper manifests will be entered into the e-manifest system by the receiving facility or by a USEPA contractor, which will delay its availability. Generators, transporters, and receiving facilities must maintain a paper or imaged signed copy until they have access to e-manifest system with signed facility copy. Below is a summary of each of the paper manifest options:

2a. Receiving facility uploads manifest data from its industry system with scanned image for signatures. The fee for this process is \$6.50 per manifest.

2b. Receiving facility uploads an imaged electronic copy of the manifest and the USEPA contractor enters the data into the e-manifest system. The fee for this process is \$10 per manifest.

2c. Receiving facility mails a hard copy of the completed manifest to USEPA and the USEPA contractor enters the data into the e-manifest system. This option will be available for three years. The fee for this process will be \$15 per manifest.

The current paper manifest may be used after June 30 if a label is placed on the top copy indicating it is to be sent to USEPA. Do not send any paper copies to Illinois EPA. USEPA recommends transition to the new 5-part form as soon as possible to avoid confusion and facilitate compliance.

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.

A user has the option of entering additional Biennial Report information into the manifest record although it will not integrate into the Biennial Report system at this time.

Obtaining Identification Numbers

Any entity that uses the entirely electronic or hybrid e-manifest must have a USEPA identification number. Entities with an existing USEPA identification number (which is location specific) should use that number for tracking non-hazardous special waste. If you need to apply for a number, please use the form at https://www.epa.gov/sites/production/files/2017-07/documents/site_id_instructions_andforms.pdf

The Illinois EPA has developed an identification numbering convention for entities that generate, transport, or receive exclusively non-hazardous wastes, does not have a USEPA identification number assigned to their location, but has a 10-digit Illinois EPA Bureau of Land inventory number. In those cases, the facility should use "IL" followed by the 10-digit Illinois EPA identification number as the USEPA identification number on paper manifests that are imaged or mailed. Those facilities should also complete the Form 8700-12 using the above link to use electronic manifests and create retrievable records. When submitting the Form 8700-12, include in the comment section that you are applying to use the e-manifest system exclusively for Special Wastes. When submitting the Form 8700-12, existing Illinois EPA inventory numbers may be found or verified at <http://epadata.epa.state.il.us/land/inventory/>. To obtain an Illinois EPA inventory number use the form at <https://www2.illinois.gov/epa/Documents/iepa/epa-forms/land/inventory-identification-number-application.pdf#search=inventary%20identification%20number>.