

e-Manifest Fact Sheet: Brokers

EPA is establishing a national system for tracking hazardous waste shipments electronically. This system known as “e-Manifest,” will modernize the nation’s cradle-to-grave hazardous waste tracking process while saving valuable time, resources, and dollars for industry and states. EPA is establishing e-Manifest per the Hazardous Waste Electronic Manifest Establishment Act, which Congress enacted into law on October 5, 2012. e-Manifest is a multi-faceted program that includes system development; regulation and policy; implementation and communication; and consultation with the e-Manifest federal advisory committee.

What Brokers Need to Know

- e-Manifest launches nationwide on June 30, 2018.
- Brokers will have the option to prepare manifests electronically for their generator clients.
- To use e-Manifest, brokers will need to obtain an EPA ID and register for e-Manifest.
- Existing 6-copy manifest form is being replaced with a new 5-copy form. The new form will be effective starting on June 30, 2018.

Scope of e-Manifest

e-Manifest will facilitate the electronic transmission of the uniform manifest form, which accompanies shipments of hazardous waste. e-Manifest affects any regulated waste shipped on a manifest, including:

- RCRA federal hazardous waste,
- Regulated PCB waste shipped on a manifest,
- State-regulated hazardous waste (if manifest is required by origination or destination state),
- Very Small Quantity Generator waste (if manifest required by state), and
- Imported hazardous waste.

EPA will implement the e-Manifest regulations until Resource Conservation and Recovery Act (RCRA) authorized states adopt and become authorized for the e-Manifest regulations. (Note: some parts of the e-Manifest regulations, such as collection of user fees, will only be implemented by EPA.)

RCRAInfo

e-Manifest will be linked to the existing RCRA Information System (RCRAInfo) and will have the ability to validate information entered on an electronic manifest against information in RCRAInfo.

RCRAInfo is a separate EPA information system that collects information on hazardous waste sites. Information in RCRAInfo is publicly available here: <https://rcrainfo.epa.gov/rcrainfoweb/action/main-menu/view>.

How Brokers Will Be Impacted

Because brokers may service multiple clients, EPA requires them to obtain an EPA ID Number using the Site ID Form (EPA form 8700-12). This will enable brokers to track their manifest activities in e-Manifest, and make draft manifests available to their clients. In some states, brokers may submit EPA form 8700-12 electronically.

Brokers may not sign manifests in e-Manifest remotely on behalf of their generator clients, unless the broker is operating at the generator site and is the offeror of the waste shipment. In that case, a broker can sign the manifest.

What Brokers Need to Do

Obtain/Update EPA ID Number

Brokers must have an ID number to use e-Manifest. Brokers may submit EPA form 8700-12 to obtain an EPA ID Number from their RCRA-authorized state or EPA Region. The form can be found on RCRAInfo Web at

<https://rcrainfo.epa.gov/rcrainfoweb>.

Work with Customers to Select Manifest Creation Option

The e-Manifest system allows for three types of hazardous waste manifest creation options:

- Paper (generator, transporter, and receiving facility all sign on paper)
- Hybrid (starts as paper manifest signed by the generator and then is signed electronically by the transporter and receiving facility)
- Electronic (created in e-Manifest and electronically signed by all entities listed on the manifest)

Beginning on June 30, 2018, all receiving facilities must submit manifests to EPA. Electronic and hybrid manifests are submitted to EPA instantaneously, as they are signed electronically in the system. EPA's Cross-Media Electronic Reporting Rule (CROMERR) provides the legal framework for electronic reporting under EPA's regulatory programs. Those signing electronically need to go through identity proofing plus sign using a CROMERR-compliant electronic signature (e.g., password plus personal challenge question). If a paper manifest is used, the receiving facility must submit the manifest to EPA within 30 days of receipt. Receiving facilities have several options for submitting paper manifests to EPA, including mailing in paper manifests, sending a scanned image of a paper manifest or submission of image and data files via e-Manifest.

Brokers can utilize the EPA's e-Manifest website to create electronic manifests for their customers or they can utilize the e-Manifest API (Advanced Programming Interface) to add e-Manifesting capabilities to their existing manifesting system.

Register with e-Manifest

e-Manifest registration and instructions will be available at: www.epa.gov/e-Manifest.

Stay Updated

Subscribe to the e-Manifest Listservs for the latest news and monthly webinar announcements:

- To subscribe to the general program Listserv, send a blank message to: eManifest-subscribe@lists.epa.gov
- To subscribe to the developers only Listserv, send a blank message to: e-manifestdev-subscribe@lists.epa.gov

For more information on EPA's e-Manifest Program and frequently asked questions:

- Go to www.epa.gov/e-Manifest

Direct your questions to the contact(s) listed below.

State Information: New Jersey

In NJ, hazardous waste "**Brokers**" are required to possess an A-901 license prior to engaging in the solid or hazardous waste industry. The license is issued by NJDEP and the background check, submission of Personal History & Business Concern Disclosures are handled by the Office of the Attorney General's Division of Law & NJ State Police. (Reference [N.J.A.C. 7:26-16 et. seq.](#))

<http://www.state.nj.us/dep/dshw/resource/CURRENT/WEB%20PDFS/26%20CHAPTER%2016.pdf>

"**Broker**" means any person, not registered with the Department, who for compensation (e.g., a commission or fee) arranges for the transportation or disposal of solid or hazardous waste, other than waste generated by that person.

Current list of A-901 Licensed Brokers:

<http://www.nj.gov/dep/dshw/hwr/regislic/lru.htm>

- Drop Down Menu: Select "Report NJDEP Approved Waste Brokers"

A-901 application can be downloaded at:

<http://www.nj.gov/dep/dshw/a901/a901frms.htm>

State Contacts: New Jersey

NJDEP Compliance & Enforcement – General Questions

- (609) 943-3019 Transportation Oversight Unit

NJDEP A-901 Licensing Unit – Licensing Status

- Roxanne Feasel (609) 984-4250

NJ Division of Law – Licensing, Criminal Background & Disclosure Form Information

- Steven Hulse (609) 376-2834

State Contacts: New Jersey

Brokers must mail a completed original 8700-12 EPA Form to:

NJDEP Bureau of Licensing & Registrations
Attn: EPA ID Numbers
9 Ewing Street
P.O. Box 420, Mail Code 09-01
Trenton, NJ 08625-0420

- For questions regarding the completion of the 8700 Form:
- (609) 292-7081 - follow voice prompt
- MEBinfo@dep.nj.gov

