# OFFICE OF LAND AND EMERGENCY MANAGEMENT

## WASHINGTON, D.C. 20460

November 14, 2023

<u>**MEMORANDUM**</u>

**SUBJECT:**   Requirement to Use Electronic Manifest for EPA-led Cleanups

**FROM:**   Barry N. Breen
Principal Deputy Assistant Administrator

**TO:**   Enforcement and Compliance Assurance Division Directors, Regions 1-10
Land, Chemicals, and Redevelopment Division Directors, Regions 1-10
Superfund and Emergency Management Division Directors, Regions 1-10

*Purpose*
The purpose of this memorandum is to communicate OLEM's policy that EPA personnel and EPA contractors must use e-Manifest to meet hazardous waste manifesting requirements, as applicable, by the start of Fiscal Year 2025 unless there is a documented impediment to securing an e-Manifest compliant contractor. This new requirement applies to off-site shipments of hazardous waste and polychlorinated biphenyl (PCB) waste from EPA-led cleanups. EPA personnel and EPA contractors are encouraged to begin to use the system in advance of the mandatory deadline.

For EPA-led Emergency Response (ERs) as well as Emergency Response and Removal (ER&R) actions, each ER&R regional program must develop a plan to increase the utilization of e-Manifest by the end of Fiscal Year 2025.

*Background on e-Manifest*
EPA established a national system for tracking hazardous waste shipments electronically. This system, known as e-Manifest, modernized the nation's cradle-to-grave hazardous waste tracking system while saving valuable time, resources, and dollars for industry and states. EPA launched e-Manifest on June 30, 2018. For more information on e-Manifest, see epa.gov/e-manifest.

*Benefits of Using Electronic Manifests*
There are several benefits to EPA from use of electronic manifests:
- Accurate and more timely information on waste shipments, including immediate visibility from the moment the manifest is prepared, through when the waste is shipped off-site and to the point the waste reaches its designated receiving facility.

- Ensuring EPA's cleanup programs lead by example in the full adoption of the e-Manifest system.
- Elimination of the five-copy paper manifest form, which further supports the Agency's commitment to sustainable resource management.
- Improved quality of manifest data by leveraging built-in quality assurance tools.
- Rapid notification of discrepancies or other problems related to a particular shipment.
- Improved ability to respond to inquiries, such as from states, the public, and Congress, regarding shipments of waste from clean-ups and emergency responses.
- Cost reduction compared to paper manifest fees.

*Next Steps*

ORCR will coordinate with EPA regions, OSRTI, OEM, and other partner offices to determine the elements necessary to transition existing and future cleanups to using electronic manifests. This will include the creation of an e-Manifest Implementation Team comprised of representatives from ORCR, OEM, and OSRTI along with representatives from accompanying regional programs to include On-Scene Coordinators and Remedial Project Managers to raise and address any issues or impediments for the use of e-Manifest.

As EPA initiates new remedial or removal actions, ORCR anticipates providing system training and support for the following tasks:
- User registration
- Manifest creation (to include proper designated facilities)
- Manifest signatures
- Language for contracts and other funding vehicles
- Live support (phone/email/video chat, etc…)
- Data pulls and analysis
- Coordination with internal and external entities

EPA personnel should register for e-Manifest access at rcrainfo.epa.gov. Personnel responsible for creating and signing manifests should register as Industry Users while EPA staff overseeing shipments should register as Regulatory Agency Users.[1] EPA staff should utilize their Agency email address for all e-Manifest activity.

Managers of EPA-led cleanup programs should direct their regional personnel to contact their e-Manifest POCs[2] and work with EPA HQ to implement this requirement. e-Manifest program staff stand ready to assist with technical implementation and administrative questions.

cc:  Carolyn Hoskinson, OLEM/ORCR          Kenneth Patterson, OECA/OSRE
     Larry Douchand, OLEM/OSRTI            Gregory Gervais, OLEM/FFRRO
     Brendan Roache, OLEM/OEM              SEMD Remedial Branch Managers
     Marc Greenberg, ERT                   SEMD Removal Branch Managers

---

[1] https://www.epa.gov/e-manifest/e-manifest-user-registration
[2] https://www.epa.gov/e-manifest/forms/contact-us-about-hazardous-waste-electronic-manifest-system#Regional