

EPA Document 305F23002

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## Data Quality Issues with Hazardous Waste Manifests Submitted to EPA's e-Manifest System

### Purpose of this Compliance Advisory

The purpose of this advisory is to assist hazardous waste handlers in reducing data quality issues in the e-Manifest system and to support their compliance with the law.

The e-Manifest system is a national database that tracks hazardous waste shipments. It is a one-stop hub for submitting hazardous waste manifests to EPA that enables agencies and handlers alike to manage waste records more efficiently. Receiving facilities must submit hazardous waste manifests to the e-Manifest database in digital form – either by scanning paper manifests or using electronic manifest forms in the e-Manifest system – and they must certify that the data submitted is accurate and complete. Failure to do so could result in an enforcement action. EPA encourages receiving facilities to adopt use of electronic manifest forms to minimize data quality issues and support compliance.

### Data Quality Problems

EPA has identified data quality issues associated with manifests submitted to the EPA that reduce overall system effectiveness and prevent mismanaged waste from being identified. Accurate e-Manifest data allows handlers to easily store and retrieve records, receive automatically updated manifest information, and reduce the time spent producing reports. This data helps the EPA and state and local agencies to make important resource decisions about hazardous waste management.

### Issue 1: Inaccurate or missing ID numbers

EPA ID numbers make it possible for the e-Manifest system to connect data to the correct hazardous waste handler. When paper manifests are submitted with inaccurate or missing EPA Site Identification (EPA ID) numbers, including where the generator EPA ID number is submitted as a “VSQG” or “CESQG” code or where an EPA ID is present on the manifest, but left blank on the corresponding data file, the users cannot: 1) Use the e-Manifest system to meet the three-year recordkeeping requirements in lieu of storing paper manifests onsite; and 2) Use the e-Manifest post-submission corrections process to make modifications to the affected manifest if additional data errors are present.

### What can you do?

Users should search for existing site ID numbers in [RCRAInfo](#) using the site name, address, state, and/or zip code. This functionality is available on the RCRAInfo homepage and through e-Manifest software integrations.

### What manifests must be submitted to EPA's e-Manifest system?

Receiving facilities must submit manifests that accompany shipments with any of the following:

- Federal hazardous waste regulated under the Resource Conservation and Recovery Act (RCRA)
- PCB waste regulated under the Toxic Substances Control Act (TSCA)
- State-regulated hazardous waste (if manifest is required by origination or destination state)
- Imported hazardous waste

Hazardous waste handlers should verify their client's EPA ID number as well as periodically check whether EPA ID numbers need to be updated (e.g., from "VSQG" to an ID number). After an EPA ID number is assigned to a site, it should be used in the appropriate field of all manifests associated with that site.

## Issue 2: Manifest Tracking Number (MTN) mismatch and invalid paper manifest usage

Some generators have used paper manifests that were printed by non-approved, unregistered printing companies and put into circulation, which could result in invalid MTNs. Printing companies must receive approval from the EPA Director of the Office of Resource Conservation and Recovery to generate and print uniform hazardous waste manifests, including an MTN unique to each manifest.

### What is an "MTN" and why is it important?

The Manifest Tracking Number (MTN) is a unique identifier which corresponds to a certain EPA-approved and registered printer. The approved printer generates the MTN in Item 4 of the manifest. It serves as a reference for communication between industry, states, and EPA users. The simple but effective design of the MTN ensures that each manifest and its associated data can be stored, recalled, and used as needed.

### What can you do?

Only use manifests from an approved and registered printing company and do not attempt to manually modify an MTN. A list of registered printing companies [can be found on the EPA website](#). If you receive an error while uploading a manifest, use the *Feedback/Report an Issue* button in RCRAInfo to contact the EPA.

## Issue 3: Errors associated with the digitization of paper manifests

There have been various errors that have occurred during a receiving facility's digitization processing of paper manifests. These can be due to typographical errors or illegible information on the paper manifest that result in significant discrepancies between the hazardous waste shipment and what is seen in the e-Manifest system.

### What can you do?

File electronically. EPA strongly encourages handlers to transition to electronic manifests, which are faster, easier, space-saving, and more convenient than using paper submissions. Unlike paper manifests, electronic manifests already exist in digital format with built-in data quality checks. Users of the e-Manifest system have immediate access to up-to-date information that can be used when completing electronic manifests. Otherwise, handlers who continue to use paper manifests should use the post-submission corrections process in RCRAInfo to resolve digitization errors.

Hazardous waste generators and transporters can also benefit from using e-Manifest, which is connected to RCRAInfo. Registered RCRAInfo users can submit corrections online, use e-Manifest to meet record-keeping requirements in lieu of storing the paper manifest on site for three years, and complete other regulatory requirements.

## More Information

- [Log in to RCRAInfo](#) to access the e-Manifest module, instructional videos, and help pages
- [The e-Manifest homepage](#) has a wide range of resources available
- [Frequently asked questions \(FAQs\) about e-Manifest](#)
- [Uniform Hazardous Waste Manifest instructions](#)
- [Approved registered uniform hazardous waste manifest printers](#)
- [Learn more about e-Manifest software integration](#)

### Disclaimer

This Compliance Advisory addresses select provisions of EPA regulatory requirements using plain language. Nothing in this Compliance Advisory is meant to replace or revise any Resource Conservation and Recovery Act (RCRA) permit, any EPA regulatory provision, or any other part of the Code of Federal Regulations, the Federal Register, or other laws.