

Allowing Remote Signers for Electronic Manifests: U.S. Environmental Protection Agency Issues Guidance



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The United States Environmental Protection Agency (“EPA”) issued May 5th Resource Conservation and Recovery Act (“RCRA”) guidance titled:

Allowing Remote Signers for Electronic Manifests (“Guidance”)

The *Guidance* is transmitted from Carolyn Hoskinson, Director, EPA Office of Resource Conservation and Recovery to the Land, Chemicals, and Redevelopment Division Directors, Regions 1-10.

The purpose of the *Guidance* is stated to communicate EPA’s policy allowing:

. . . generators, transporters, and receiving facilities to execute electronic signatures through their employees or contractors who are located remotely from the hazardous waste shipment.

Pursuant to RCRA EPA established a national system to track hazardous waste shipments from the site where the waste was generated to its final recycling or disposal facility. This is commonly known as cradle-to-grave tracking.

The e-Manifest system was established to facilitate the electronic transmission of the uniform manifest form which accompanies the shipments of hazardous waste. The agency established the national system for tracking hazardous waste shipments electronically a number of years ago. The intent was to modernize the United States cradle-to-grave hazardous waste tracking process. This was established pursuant to the Hazardous Waste Electronic Manifest Establishment Act.

The May 5th *Guidance* establishes a policy to allow generators, transporters, and receiving facilities to execute electronic signatures through their employees or contractors who are located remotely from the hazardous waste shipment. The intent of the *Guidance* is to reduce the number of employees and contractors who need to register the signed manifest. The objective is to alleviate the need to have network access at the point of custody exchange. This is intended to allow sites to initiate the electronic signature process through system-to-system communication.

The *Guidance* applies only to electronic signatures on electronic manifests conducted by generators, transporters, and the initial receiving facilities. The final designated receiving facility is still required to submit the final electronic manifest for invoicing to the e-Manifest system via a signature method that complies with EPA’s Cross-Media Electronic Reporting Rule. As a result, the *Guidance* does not apply to wet ink signatures on paper manifests.

A copy of the *Guidance* can be downloaded [here](#).

