

Published on July 26, 2024, the Third Rule revises key aspects of hazardous waste manifest regulations under the Resource Conservation and Recovery Act (RCRA), enhancing the e-Manifest system's functionality and adoption. The final changes go into effect in 2025 nationwide and are meant to reduce administrative burdens, increase access to information, and align the system for future integrations.

What's Changing?

Effective January 22, 2025:

- **Mandatory Registration:** LQGs and SQGs must register in the e-Manifest system and designate a Certifier or Site Manager to handle submissions and corrections.
- **Revised Manifest Form:** An optional streamlined 4-copy form replaces the 5-copy version, featuring expanded fields for international shipments. All shipments can use either the current or new manifest form until December 2025.
- **Elimination of Paper Returns:** Treatment, Storage, and Disposal Facilities (TSDs) are no longer required to provide final, signed manifests to customers. Final manifests are accessible in the e-Manifest system.
- **Data Corrections:** Entities must respond to EPA or state correction requests within 30 days.
- **Exception Reports:** Generators must file these for unreturned manifests within 60 days (increased from 45 days for LQGs).
- Discrepancy Reports for Unresolved
 Discrepancies: Must be submitted within 20 days from receipt by the TSD, replacing the 15-day paper submission requirement.

Effective December 1. 2025:

- Mandatory Use of e-Manifest System Reporting: Exception, Discrepancy, and Unmanifested Waste Reports must be filed electronically through the e-Manifest system.
- Mandatory Use of Revised Manifest Form: All shipments must use the new 4-copy manifest form.
- Export Requirements: Exporters must submit manifests to e-Manifest and pay associated user fees.

Key Dates

- January 22, 2025: Portions of the rule take effect
- December 1, 2025: Compliance becomes mandatory for provisions requiring system updates

Helpful Links

- e-Manifest FAQs
- e-Manifest System Overview
- <u>User Registration Guide</u>
- Data Correction Requirements