

The United States Environmental Protection Agency (EPA)'s RCRAInfo Industry Application (App) allows sites that generate and/or manage RCRA Subtitle C hazardous waste to electronically submit site-related information (site identification, annual/biennial reports, and hazardous waste manifests) to their government regulator (typically a State environmental agency) and/or view it, if the site has an EPA ID #. The App has these 4 modules/tabs:

1. **Annual Report** - for Hazardous Waste Report submissions for waste generated in even numbered calendar years.
2. **Biennial Report** - for Hazardous Waste Report submissions for waste generated in odd numbered calendar years.  
(Please note that the permissions are not the same for 1. and 2., 1. is called "Annual Report", and 2. is called "Biennial Report", with each having their own tab on the Site Details screen.)
3. **e-Manifest** - for EPA Form 8700-22 (Uniform Hazardous Waste Manifest) submissions.
4. **myRCRAid** - for EPA Form 8700-12 (RCRA Subtitle C Site Identification Form) submissions.

To become an Industry user of the RCRAInfo Industry App, you must obtain a RCRAInfo Industry App account, and the guidance that follows is intended for users of this software.

#### 1. To register for a RCRAInfo Industry account:

The person using the software (user) should be an employee of the hazardous waste handler (generator, transporter or receiving facility). Consultant instructions are on page 8.

Accounts cannot be shared, everyone using the software must have their own account using their own name and their own unique work email address, not a general mailbox nor personal email. More than 1 employee may get an account for the same site.

**Existing users** - use the user id and "case sensitive" password of your:

- already created RCRAInfo Industry App account, or
- already created EPA Central Data Exchange (CDX) account

at <https://rcrainfo.epa.gov/rcrainfoprod>

If you lost your user id, use the "Forgot User Id?" link on the login screen. A "Forgot Password?" link is also there.

**New users** - register your own new account by going to website above

- click "**Register**" and then select the "**Industry User Registration**" button. A user should provide their own **full legal name** and own individual **work email address**. Please review the "Watch How-To" video or read [help registering for a new account](#).

**Tip:** It is recommended that you write down your user id and password for future use, including the case, and store them securely, since they may not be used very frequently.

## 2. My Sites Screen – Requesting Site Permissions

When adding existing sites to your account: Each user should request permission for their own company's site(s). Generator users should not request permission for a transporter nor receiving facility site. Transporter users should not request permission for a generator nor receiving facility site. Receiving facility users should not request permission for a generator nor transporter site.

Users must request permission for a site before they may submit data for it online using Annual Report, Biennial Report, myRCRAid or e-Manifest, by using the "Select Existing Site" button on their "My Sites" screen (unless previously done). Users may request access to multiple sites if their company has multiple locations and EPA IDs. The following permission levels may be requested for a site for each module:

- Viewer - can view submissions made by other Industry users. For e-manifest, you can see any paper manifest after the receiving facility submits it, and its data is entered. Running e-manifest reports requires at least e-manifest Viewer permission for a site.
- Preparer - can only create draft submissions, which must then be electronically (e-) signed by a Certifier Industry user. For e-manifest, can Quick Sign a manifest in RCRAInfo. Consultants can be Preparers (see page 8).
- Certifier - can prepare, e-sign and submit forms. For e-manifest, can make corrections.

Site Manager (SM) is the highest-level permission and allows use of all Industry modules.

- SM - can prepare, e- sign and submit forms, and **must** manage any other Industry user(s) for the site (A SM can approve, deny, and modify permissions of users of their site. By approving a user requesting Certifier or SM permission, you are authorizing them to e-sign for your site\*). An EHS Manager or higher would qualify to be SM. A Consultant may not be a SM. A SM user should gain access before other users request access. Only one RCRAInfo account is allowed for each individual with SM. For receiving facilities, the SM must manage and pay any EPA e-Manifest bills.

### To request permissions for a site:

A. The "Select Existing Site" button on My Sites screen should be used to search for and select a site that already has an EPA ID number and is in the RCRAInfo handler database, request access to it, and select a module and permission level. EPA ID numbers starting with NYN should not be used, because they are not assigned to the site for use by industry.

1. Click "**Select Existing Site**" button. Search only by EPA ID number in the Site ID field if you know it. If not, try searching by Street Name, City, and State of New York, with the Site Name and other fields left empty. Click "**Search**" button.
2. If the site you are looking for is displayed, click the checkbox next to it, then click the "**Request Access**" button. It should have your company name or former name, or the name of a former occupant of site.
3. Select the permission level for the modules you want (see list above).
4. Click "**Send Request**" button and then wait and be patient, please. If a Site Manager already exists for this site, your permission request will only go to them for processing. Otherwise, it will go to the state or federal government staff who process permission requests.


B. The “[Request New Site ID](#)” button may be used to request that a **new** EPA ID number be assigned to your site location, if it does not already have an EPA ID number. The user requesting a Site ID must be employed directly by the site and not a consultant or contractor.

- **The site location should not already have an ID assigned to the company (if it does, use “Select Existing Site” button).**
- A site may have only one EPA ID number per active business per location, and a business cannot take the EPA ID number with them when they move to a new site.
- The EPA ID can be reassigned to a new business at the same location if the old business is gone.
- It is very important that you conduct several searches before requesting a new site ID to ensure that an EPA ID number has not already been created for this location for a company. Searching simply by street name (not including the street number) and city is a good start.
- You can use the “Select Existing Site” button or [RCRAInfo Web](#) to search.

After clicking the “Request New Site ID” button, the user will need to fill out the info for the site on the “Add Source Record” screen in myRCRAid (See the last section of this document for myRCRAid tips).

**Note:** If you have not completed an Electronic Signature Agreement, you will be prompted to do so before you can proceed with your new ID request. (See “Electronically Sign Form Submissions” below)

C. An email will be sent to the Site Manager for the site or to a government administrator who can grant the permissions that you requested for the site. A government administrator reviews the myRCRAid Site ID form info and assigns a new ID to the site, if appropriate. You will receive an email from [rcrainfo.admin@epa.gov](mailto:rcrainfo.admin@epa.gov) once the permissions for the site have been granted (or denied). Any approved Industry App module(s) may then be used. Please do not reply to these emails, since they are from a computer server and no person receives any replies you send.

**To review or request a change to your existing site permissions:** Click the profile icon  in the upper right-hand corner of the screen and select "Profile". Click the “My Site Permissions” tab. Select “New York” in Activity Location if necessary. Review your permissions for each site and module. Click the checkbox for the site(s) you wish to change, if any. Click the “Modify Permissions for Selected Sites” button. Select the new permission you want for each module for the site(s) and click the "Send Request" button.

\*Site Managers should review requests to use their site’s in RCRAInfo by looking in their Pending Requests tab. They may edit their own permissions by using the My Users tab under Tools, User Maintenance.

### 3. Electronically Sign Form Submissions

**A Consultant/Broker may not e-sign nor sign manifests unless they are onsite during waste shipment.**

**Tip:** It is recommended that the exact answer you type for your five (5) e-signature security questions be written down for future use, including the case and any spaces, and stored securely.

**Electronic Signature Agreement** (e-Signature Agreement or ESA)

- Identity proofing is only required once per user account, and users who have not completed it will be prompted to do so on a subsequent login to RCRAInfo.
- Identity proofing is only required for users who requested to be able to electronically sign (for Certifier or Site Manager permission levels) or who requested a new site ID.
- Real-time electronic identity proofing requires your full legal name, home mailing address, birth date, the last four (4) numbers of your social security number, and home phone number.
- If you are not approved, try again using your former address.
- Information entered for electronic identity proofing is for identity verification purposes only and will not be stored in the RCRAInfo Industry App system.
- Please DO NOT email any of your personal info, because email is not secure. https over the web is secure.

This allows for the immediate ability to electronically sign and submit data. A paper identity proofing process is also available but **will take much longer for approval.**

#### Software tips for using RCRAInfo Industry App:

Users need to use their work email account as well as the internet and a web browser (turn off pop-up blocker) to register and use the software.

- Your login password expires every **90** days and is CASE sensitive.
- The system will time-out and automatically log the user out if the user does not click anything for more than twenty (20) minutes. Therefore, it is highly recommended that you save your work periodically.
- Use the navigation buttons provided on the web page, not the browser's "Back" button.
- User can press ctrl and + to zoom in or press ctrl and - to zoom out.
- User should only login in one (1) browser window at a time.

Knowing a site's EPA ID number (which is assigned to a site's physical location) saves time when using the App. If you do not know the site's EPA ID number, you can search for existing site RCRA EPA ID numbers at RCRAInfo Web: <https://rcrainfo.epa.gov/rcrainfoweb/action/modules/hd/handlerindex>

#### Problems or questions about software

Help is available within the RCRAInfo Industry App by clicking "Documentation" from the blue bar at top of screen, selecting "Help", "User's Guide", "My Sites". The "Site Dashboard" section of the "User's Guide" has "Annual Report", "Biennial Report", "e-Manifest" and "myRCRAid" subsections. Also under Documentation is LearningZen, online training courses of self-paced video presentations of the RCRAInfo screens. EPA also has e-Manifest [FAQs](#) available on their website. If you still have an issue, click "Feedback/Report an Issue" in the blue bar at the top of the screen to report a problem.

e-Manifest Helpdesk for Industry Users: 8:00 am ET – 6:00 pm ET Call: Toll Free: (833) 501-6826 or Direct Line: (970) 494-5508 Email: [helpdesk@epacdx.net](mailto:helpdesk@epacdx.net)

If you have a question about what data to enter online for your hazardous waste (HW) report, or whether you must submit a report for any particular year, [please review DEC webpage](#) which has NYSDEC waste thresholds which require filing, **New York-specific requirements**, DEC contact.


### Biennial Report/Annual Report (BR/AR) tips

What follows is help using the RCRAInfo software to make HW report submissions online. New York has opted to use RCRAInfo starting with the 2020 calendar year.

Do you already have a RCRAInfo Industry App account? If you do not remember or lost your user id, there is a “[Forgot User Id?](#)” link on the login screen. See page 1 for other login tips.

You should check your permissions for Annual Report and Biennial Report for a site in your User Profile. The permissions are not the same for these 2 different apps, one is called Annual Report, and the other is called Biennial Report. Each app has its own tab on the Site Details screen.

- Use Annual Report app/permission for even numbered calendar years (2020, 2022, etc.)
- Use Biennial Report app/permission for odd numbered calendar years (2021, 2023, etc.)

To review or request a change to your existing site permissions: Click the profile icon  in the upper right-hand corner of the screen, select "Profile". Click the “My Site Permissions” tab. Select “New York” in Activity Location if necessary. Review your permissions for each site and module. Click the checkbox for the site(s) you wish to change, if any. Click the “Modify Permissions for Selected Sites” button. Select the new permission you want for each module for the site(s); If you want to submit the form yourself, select Certifier for both Annual Report and Biennial Report, and Viewer for e-Manifest and click the "Send Request" button. You only need to do this once; permissions will work for subsequent years.

Help using RCRAInfo is available, click Documentation, Help, then on left, click User’s Guide, Site Dashboard, Annual Report (for calendar year 2022 submittal), Biennial Report (for calendar year 2023 submittal) Please read the “Create New Submission” section. EPA FAQs for BR:

<https://rcrapublic.epa.gov/rcrainfoweb/action/modules/main/faq/view> RCRAInfo Web

The definitions and lists of the codes used on this report are in the latest version of the RCRA Subtitle C Reporting Instructions and Forms document, in the Code Lists section, posted in Key Links box at <https://rcrapublic.epa.gov/rcrainfoweb/action/main-menu/view>

After creation, a report record will have a status of Draft. Drafts have **NOT** been submitted to DEC/EPA as required by regs (See page 7 about how to Submit).

On your My Sites screen of RCRAInfo, click the site name for the EPA ID # you used on your manifests. Click the **Annual Report** tab for waste generated in **even numbered** calendar years, or the **Biennial Report** tab for waste generated in **odd numbered** calendar years, then the “**Create New Submission**” button. For BR, the calendar year will automatically display. For AR, select the calendar year, click “Continue”. Documents cannot be uploaded. Please do not use “OPTION: To notify your regulator that you no longer meet the requirements to submit a Biennial Report,” NY does not allow it. Please email

HazardousReport@dec.ny.gov instead. Click “**Continue to Data Entry**” unless you want to upload flat files (there is [help](#), and Biennial Report File Specifications Guide for Industry Users posted on [RCRAInfo Web](#)). If this ID has prior years data, a prompt allows you to create copies of the GM pages from the last report submission for your site (their quantity and UOM will be blank). (You would have to edit them all, by clicking the pencil icon in their Action column on right. Then carefully review them all, to ensure all the data for every field is still correct. Then revise them all by adding quantity and UOM and delete any pages for wastes not generated in the year that the report is for.)

You must create a new **GM** form for each hazardous waste stream your site generated in the year, and a new **WR** form for each hazardous waste stream received from off-site in the year, as described in more detail in **Appendix A** in this document, **and in EPA GM form instructions**. Please **ONLY** use a WR form if your site location received hazardous waste from another off-site location.

Be careful not to confuse section 2 of the **GM** form, which is for **on-site** waste management, and section 3 of the **GM** form, which is for **off-site** waste management, usually where you ship waste to.

-Section 1 is for info about the hazardous waste you created/generated on-site for the waste stream (the source, characteristics, and quantity).

-Section 2 is only for any management you performed to hazardous waste on-site, other than storage (the quantity and the management methods).

-Section 3 is for your hazardous waste that was sent/shipped off-site, the quantity, where it was sent and how it was managed after it was sent off-site. If you exported waste to a non-US country, and the foreign facility does not have an EPA ID # in RCRAInfo, please start the ID with FC, then country, e.g., FCCanada, in the Off-site Facility EPA ID # field, then add its name, location address, and country.

#### New York-specific requirements:

Annual report: a report is required every year you meet threshold. Wastewater treatment units and elementary neutralization units for wastewater, and hazardous waste exported to a foreign country must be reported. Waste paint is a universal waste (UW) in NY, in addition to federal UW of Batteries, Aerosol Cans, Lamps, Pesticides, Mercury containing equipment. UW is exempt from reporting.

PCBs are a state-defined Hazardous Waste: Use all applicable state PCB hazardous waste codes B001-B007 (listed on page 11) in the “**Hazardous Waste Codes (State)**” field on the GM, WR and Site ID forms.

C. Hazardous Waste Codes (State)

Selected

None selected ▾

If the hazardous waste includes hazardous wastewater which may be subject to a hazardous wastewater regulatory fee, or if the hazardous waste which may be subject to a hazardous waste regulatory fee may be eligible for an exemption, select the following codes if they apply to your waste in the “**Hazardous Waste Codes (State)**” field, (in addition to any applicable B001-B007 codes):

Code	Description
WW	Wastewater. use only on GM form
REM EX	Remedial Exempt. use only on GM form
RCY EX	Recycling Exempt. use only on GM form

**Your site must qualify for a Remedial or Recycling exemption to apply for it. See Appendix B for help on this and on wastewater.**

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A site's existing location address in RCRAInfo should not be changed on the Site ID (**SI**) form (It may be clarified or corrected, e.g., adding a street number if missing, or if US Postal Service changes the address of your physical location.) An EPA ID # is assigned to a company at a site's location and never moves. Use your EPA ID # for the location where the waste was generated. See abbreviation tips to use in address fields, and do not use any punctuation marks, as described in the last section of this document.

Please include the company/entity name of the waste generator in the site name field.

After clicking the "**Add Site ID Form**" button, the form will be pre-populated with the most recent information associated with this EPA ID #.

**Please** review all fields on screen when creating the **SI** form and revise them to ensure they are currently accurate and complete. This is your opportunity **to fix any prior mistakes or errors for your site**, which are in RCRAInfo and listed on EPA's public internet web page. Once you have completed all the data entry, click the "**Review**" button at the bottom of the screen. You will be taken to the top of the screen. Please review info as you scroll down. Click the "**Save**" button at the bottom of the screen. Field name definitions for the SI form are available in EPA 8700-12 SI form instructions.

When done with data entry and editing of all your GM, WR and SI forms, please make sure your GMs are Complete. Incomplete GM forms may be identified by sorting on the Status column. An "Incomplete" form must be edited, by clicking its pencil icon in its Action column on right. After editing, click Save.

New in the 2023 Biennial Report: Before you can e-sign and send your report to your appropriate regulator, the data provided must be validated. To validate your data, click the "**Validate**" button at the bottom of the page. The validations are categorized as "**Errors**" or "**Warnings**". If the validation triggers an error, you **MUST** correct the data before you can proceed with marking your report ready for signature or e-signing and submitting your report. If the validation triggers a warning, you may either correct the data by going back to report and editing the form, OR you may provide an explanation in the explanation box provided that indicates why the data is not an error.

Section 3 of GM allows entry of exported waste to a non-US country, by starting the ID with FC, then country, e.g. FCCanada. A warning "The Off-site TSDF ID reported does not exist in RCRAInfo." may appear for it after clicking Validate. To address the warning you may enter, "Exported waste to a non-US country, and the foreign facility does not have an EPA ID # in RCRAInfo."

To submit report: You must click the "**Sign & Submit**" button at the bottom of the page, to start the electronic signature (e-sign) process. Click "**Accept**" button. Next, you will be prompted to enter your login **password** and click "**Login**". Next, one of your five security questions will be displayed. Please enter the correct answer in the box and click "**Answer**". Click the "**Sign**" button to sign and submit your Annual or Biennial report to EPA and NYSDEC. If you do not successfully complete this, your report has **not** been submitted.

You will get an email from rcrainfo.admin@epa.gov when you have successfully submitted your report for review, then later when it is either accepted or rejected by an agency reviewer. If your submittal is



returned to you for corrections, you will get a rejected email that contains a reason from the agency reviewer. Accepted reports will be listed in the Completed section of the Annual/Biennial Report tab.

A training video explains/shows how to use RCRAInfo to complete the GM, WR, and SI forms online: <https://www.dec.ny.gov/fs/videos/training/BR-TrainingVideo.mp4> (263 mb file size, 10 minutes)

*Video Credits: Byron Bellamy, California Department of Toxic Substances Control, wrote, created, edited, and narrated this video. Noa Logan Klein, PhD, State of Hawaii Department of Health, edited the video.*

The video starts on the RCRAInfo My Sites screen. The original video and all the "**links below the video**" verbally mentioned in it are at <https://dtsc.ca.gov/biennial-report-training-video/>

A report of manifest data for your sites is available in RCRAInfo for industry users, however the data takes at least 30 days after a shipment is received to be entered into RCRAInfo, if not longer:

Click Reports, e-Manifest, Manifest Summary Report. Select your EPA ID in Sites, Generator in Entity Type, Shipped Date in Date Range Type and Custom for date range. Select January 1<sup>st</sup> to December 31<sup>st</sup> of the calendar year the AR/BR report is for. A report in PDF file format is created. e-manifest reports require at least e-manifest Viewer permission for a site.

#### When 2 Users work together to Prepare then Submit

A user with Preparer permission for a site would create a draft form/report, save, review, and then click the "Mark Ready for Signature" button at the bottom of the screen. Contact the user with Certifier or SM permission for this module and site and ask them to review and e-sign it online.

A user with Certifier or SM permission for a module for a site would then e-sign by: Login, click **My Sites** tab, **site name**, **Annual Report** or **Biennial Report** or myRCRAid tab near top. Click pencil edit icon on right for 'Draft' or 'Ready for Signature' status record in top table. Review content of forms by using little printer icons if you want. (revise/save anything necessary) Click '**Sign & Submit**' button at the bottom of the screen and complete the electronic signature process, described above.

#### Consultants and their clients/HW Generator:

1. If your client(s) has created their own RCRAInfo account or already has a CDX account, they should login and request Certifier permission (AR, BR) for their site/ID in RCRAInfo. This will allow the client to review, e-sign and submit the Annual Report to EPA/DEC. (They must be identity proofed)

Then the consultant may request Preparer permission to draft report forms using RCRAInfo (Consultants please wait to request Preparer access until after your client gains access to a Site ID. This will help you avoid creating a draft report which cannot be e-signed.), OR

2. If your client will not use RCRAInfo to e-sign online, a paper form to delegate signature authority to the consultant can be used instead, signed by a responsible corporate officer of the company that generated the waste. A blank DSA form is [posted](#).

Please request certifier permission access for AR, BR, and myRCRAid for the site in RCRAInfo. After receipt of the signed DSA and approval by the government administrator, the consultant would then be the Certifier in RCRAInfo and must be identity proofed by RCRAInfo also. You may click printer icon and send pdf files of your draft to your client for review before e-signing.



EPA has established a national web-based manifesting system (e-Manifest <https://www.epa.gov/e-manifest>) for tracking hazardous waste (HW) shipments electronically (data is entered from paper manifests). The EPA Uniform HW Manifest Form 8700-22 is a chain-of-custody form used to track HW from the time it leaves the generator facility where it was produced, during transportation, until it reaches the off-site waste receiving facility that will store, treat, recycle or dispose of the HW. The e-Manifest module was launched on June 30, 2018.

#### e-Manifest tips

**A Consultant/Broker may not e-sign nor sign manifests unless they are onsite during waste pickup/shipment.**

**It is recommended that generators contact their transporter and receiving facility about who shall create new manifests and whether the manifests will be filled-in on paper or in the e-Manifest system, to help prevent duplicate records for the same shipment.**

Foreign export manifests for waste sent to a foreign country cannot be tracked in e-Manifest, so export manifests will continue to be tracked using paper manifest forms. **NY generators must continue to submit copies of the generator copy of export manifests to NYSDEC.** Imports of HW are tracked in e-Manifest.

Waste generators using paper (and electronic) manifests must verify the receipt of their wastes by receiving facilities, per the manifest regulations. Receiving facilities are required to upload manifests into RCRAInfo, not the generator. **Generators can use RCRAInfo to ensure all their manifests are received** and entered in RCRAInfo by their receiving facility. Both their manifest data and the image file of their paper manifest should be viewed.

It is recommended that you use [RCRAInfo Web](#) to verify that the EPA ID number, site name, site location address, mailing address, and contact information associated with your site are correct. If this information is not correct, use myRCRAid (see page 12) to revise this information. The information associated with your site will be used on your manifests in the e-Manifest system. You should ensure that your EPA ID number, site name, and site location address where your waste is generated are all correct on your paper manifest.

If you do not know a site's RCRA EPA ID number, searching by Street Name, City/Town, and NY is recommended, with the Site Name and other fields left empty. You should add only one word in a search field (i.e., only use "main" if searching for "Main Street"). If you do not find your site, you should search by all the street name variations (e.g., by "Southern" and then by "9w") and all the city/town name variations (e.g., by "Flushing" and then by "Queens") for the site location.

EPA Region 2 issues the EPA ID numbers for sites located in New York State. EPA ID numbers are assigned to a site's physical location (an EPA ID number does not transfer with the generator if the generator moves to a different site). Small quantity generators (SQGs), large quantity generators (LQGs), and treatment, storage, and disposal facilities (TSDFs) are required to have an EPA ID number. Any

generator who wants to participate in e-Manifest but does not already have an EPA ID number must obtain one (see Request New Site ID on page 3). User accounts are linked to EPA ID numbers.

For more information about New York site locations, please see EPA Region 2's [web page](#) on obtaining EPA ID numbers, or call 212-637-4106. EPA Region 2 assigns EPA ID numbers starting with NYP if they are provisional ID numbers, and only allows their use for 30 days. EPA ID numbers starting with NYN also should not be used. Please contact EPA Region 2 for details.


When logged into RCRAInfo, clicking on the name of a site on the "My Sites" screen will take the user to the "Site Details" screen for that site; the site's location address is displayed in the blue bar at the top of this screen. Then click the "e-Manifest" tab.

To search by a manifest's Manifest Tracking Number (top right of form): Click e-Manifest tab. Use the 'Check Manifest Status' button. (If a manifest returns a status of "Found" and you cannot find it by using the "Search Manifests" button, please contact EPA using the "Feedback/Report an Issue" link.)

Almost all HW shipments have used paper manifest forms. If creating a **fully** electronic e-Manifest in RCRAInfo, the buttons labeled "**Save & Return**" in the pop-up windows **do not** save the data to the database. The "**Save**" button at the bottom of the e-Manifest Edit screen must be clicked for data to be saved in the database, otherwise the data changes will be lost. When using the "Add Waste Line" pop-up window, click "Build U.S. DOT Description" radio button to search for and select a waste, without having to type it.

The process to create a fully electronic e-manifest has numerous steps and requires coordination between the handlers listed on the e-manifest. Users start by creating a new e-manifest record, saving it with a status of "**Draft**", and then saving it with a status of "**Pending**". Then, **only** the receiving facility selected on the manifest can change the status of the e-manifest to "**Scheduled**" (for pickup). Then, the generator, transporter and receiving facility must electronically sign the e-manifest **in order, as they relinquish or accept control of the waste**. It is important that handlers e-sign in order, to reflect that the custody of the shipment changes as each handler e-signs the e-manifest during transportation from the generator to the transporter to the receiving facility. Before e-signing, the contents should be reviewed for completeness and accuracy. EPA has revised the RCRAInfo software in December 2020 to allow generators and transporters to Quick Sign a manifest online if they have e-manifest Preparer or higher permission level.

It is recommended that generators and transporters have printing ability, to allow them to produce a printed copy of an e-Manifest, because **US DOT currently requires the presence of a hard copy paper**

**manifest during transportation**. Use the  icon on either the edit or view screen to print the e-manifest data to look like an official paper manifest form.

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Click the "View uploaded paper manifest" link in lower left, to view an image of the paper manifest in a pdf file, if paper was used, and if available (30 days after shipment is received).

Post-waste receipt data corrections to the manifest must be made in the e-Manifest system, no mailed paper-based changes will be accepted. A generator may contact the receiving facility to request changes.

## New York-specific requirements for e-Manifest

New York requires the use of all applicable state PCB hazardous waste codes B001-B007 (listed in 6 NYCRR 371.4(e)), and an ultimate disposal method code L, B, R, or T (See 6 NYCRR 372.2(b)(2)(ii)) on manifests when either the generator or receiving facility are in New York. For paper, applicable codes should be added in box 13 Waste Codes. In RCRAInfo, they are listed and should be selected in the “**NEW YORK Waste Codes**” drop-down list on the “Add Waste Line” pop-up window.

\* This NYS requirement is not met by answering “Yes” to the question “Does this waste contain PCBs? Refer to 40 CFR 761.207” at top of the “Add Waste Line” pop-up window when creating an e-manifest.

### State PCB Hazardous Waste Codes:

Code	Description
B001	PCB oil (concentrated) from transformers, capacitors, etc.
B002	Petroleum oil or other liquid containing 50 ppm or greater of PCBs, but less than 500 ppm PCBs. This includes oil from electrical equipment whose PCB concentration is unknown, except for circuit breakers, reclosers and cable.
B003	Petroleum oil or other liquid containing 500 ppm or greater of PCBs.
B004	PCB articles containing 50 ppm or greater of PCBs, but less than 500 ppm PCBs, excluding small capacitors. This includes oil-filled electrical equipment whose PCB concentration is unknown, except for circuit breakers, reclosers and cable.
B005	PCB articles, other than transformers, that contain 500 ppm or greater of PCBs, excluding small capacitors.
B006	PCB transformers. PCB transformers means any transformer that contains 500 ppm PCB or greater.
B007	Other PCB wastes, including contaminated soil, solids, sludges, clothing, rags and dredge material.

### Ultimate Disposal Method Codes:

Code	Description
L	Landfill
B	Incineration, heat recovery, burning
R	Material Recovery of more than 75 percent of the total material
T	Chemical, physical or biological treatment

More info is [posted](#) about New York State manifesting requirements.

The myRCRAid module of the RCRAInfo Industry Application (App) allows generators; treatment, storage, and disposal facilities; and transporters to submit EPA Form 8700-12 (RCRA Subtitle C Site Identification (SI) Form) electronically to their regulating agency, to obtain a RCRA EPA ID number for a site location, or to update site information like site name or owner or generator status for an existing EPA ID number.

#### myRCRAid Benefits

- **Quicker Turnaround** – no paper forms and mail process; the form can be promptly reviewed and approved by the regulatory agency
- **Less Data Entry** – for sites with EPA ID numbers, the information from the previous submission is populated, making it quick and easy to revise/update it and submit
- **Better Data Quality** – built-in edit checks prevent submission of data that does not conform to the business rules; reduces the need for the regulatory agency to call for corrections to a submission
- **Simple Id Requests** – may request an EPA handler ID number for locations that do not already have one
- **Real-Time Communication** – automatic email notifications keep both the industry user and the regulatory agency apprised of the submission status
- **Easy Site Organization** – may associate your account with multiple sites, making it easier to maintain records for a company with numerous locations
- **Built-In Filing Cabinet** – history of submissions makes it easy to view electronic records submitted over time

#### myRCRAid tips to submit a SI form

See the e-Manifest tips section on page 9 of this document about EPA ID numbers.

Please include the company/entity name of the waste generator in the site name field.

A site's existing location address in RCRAInfo should not be changed using myRCRAid (It may be clarified or corrected, e.g., adding a street number if missing, or if US Postal Service changes the address.)

Field names definitions for the SI form are available in instructions: [www.epa.gov/form8700-12](http://www.epa.gov/form8700-12) (click pdf link at bottom of web page) Relevant instructions start with item 3 on page 17.


[Login](#), click My Sites tab in RCRAInfo, click the site name. Click the myRCRAid tab, then the "Create New Submission" button, review all fields on screen, and revise them to ensure they are currently accurate and complete. This is your opportunity **to fix any prior mistakes or errors for your site**, which are in RCRAInfo and listed on EPA's public internet web page. Once you have completed all the data entry, click the "**Review**" button at the bottom of the screen. You will be taken to the top of the screen. Please review info as you scroll down. Click the "**Submit**" button at the bottom of the screen and do the electronic signature (e-sign) process, described on page 7. If you do not successfully complete this, your SI form has **not** been submitted.

Note that if you may take more than 20 minutes to make changes, then, after making an edit, you should click the "Finish Later" button at bottom of screen, because system will automatically log you out after 20 minutes of not clicking on anything, i.e., no activity.

Please use US post office abbreviations in address fields, and always abbreviate the following:

Avenue	AVE	Place	PL
Boulevard	BLVD	Plaza	PLZ
Drive	DR	Road	RD
Court	CT	Route	RTE
Expressway	EXPY	Street	ST
Highway	HWY	Terrace	TER
Junction	JCT	Township	TWP
Parkway	PKWY	Turnpike	TNPK

Please do not use any punctuation marks in addresses, nor site name, except hyphen (-) and ampersand (&). The symbols # and + may also be used in the site name.

When you are done using RCRAInfo, please click the profile icon  in the upper right-hand corner of the screen and select “Log out”.

## Appendix A – GM and WR Form

### WHAT MUST BE REPORTED?

If an Annual Hazardous Waste Report is required for the Site, the following must be included:

- All RCRA non-acute and acute hazardous waste streams that were generated, shipped off-site, or treated, disposed of, or recycled at the Site;
- All RCRA hazardous waste streams that were received from off-site (WR form);
- All hazardous waste streams regulated by New York State. New York State regulates polychlorinated biphenyls (PCB's) as a hazardous waste;
- All hazardous waste streams managed in units subject to RCRA permitting requirements;
- All hazardous waste streams managed in units exempt from RCRA permitting requirements;
- Radioactive wastes if they are mixed with RCRA hazardous waste streams (unless they are excluded per 6 NYCRR 371.1(d) (7));
- Hazardous waste streams generated as a result of RCRA Corrective Actions or other remedial activities;
- RCRA hazardous waste streams generated when remediating contaminated sites. It includes those sites being remediated under federal, NY State and NYC remedial programs;
- Hazardous waste streams which are required to be evaluated in the facility Hazardous Waste Reduction Plan or Annual Update; and
- All hazardous wastes/wastewaters subject to regulatory fees.

### Waste Generation and Management (GM) Form

The annual hazardous waste report must include completed GM forms as appropriate.

A GM Form is required if, an Annual/Biennial Hazardous Waste Report is required and, if, during the calendar year being reported, the site generated enough RCRA or State hazardous waste on-site to meet the definition of a Large Quantity Generator, and/or in the calendar year being reported, the site

managed hazardous waste on-site, and/or shipped hazardous waste off-site for management, and/or generated fifteen (15) tons or more of RCRA or State hazardous wastewater.

Submit a GM Form for each RCRA or State hazardous waste and wastewater stream that meets any of:

#### WASTES TO BE REPORTED

##### 1. Hazardous **Wastewater**

Fill out only one GM Form for each hazardous wastewater stream managed on-site and ultimately discharged under at least one of the conditions below. For the purposes of this report, waste stream is defined as waste having the same source code and form code, wastewater status, and exemption status (either not exempt, Exempt Remedial or Exempt Recycling). For these wastewaters, use only Management Method codes H134 (Deepwell/underground injection), H136: Discharge to sewer/POTW (with prior storage – with or without treatment), or H137: Discharge with SPDES/NPDES permit (with prior storage – with or without treatment).

Note that the quantity reported for these system types must be the quantity of wastewater entering the pre-treatment system, which may or may not be the quantity actually discharged to the sewer/POTW, injection well, or surface water. These codes must be the only management method codes used on the report, regardless of what treatment the wastewaters receive prior to discharge.

Note that any sludge or other non-wastewaters generated from the treatment of wastewaters must still be reported on a separate GM Form if they are hazardous.

##### 2. Hazardous **Waste**

a. A separate GM Form must be completed and submitted for each RCRA or State hazardous waste stream that meets at least one of the conditions below:

- Generated on-site and subsequently managed on-site or shipped off-site in calendar year being reported;
- Generated on-site in calendar year being reported but not managed on-site or shipped off-site until after calendar year being reported;
- Generated on-site prior to the calendar year being reported but either managed on-site or shipped off-site in calendar year being reported;
- Imported from a foreign country in calendar year being reported, if you were the U.S. Importer;
- Has different Regulatory Fee Exemption (Exempt Remedial or Exempt Recycling or none)

b. RCRA or State hazardous wastes to be reported include at least one of the conditions below:

- Generated on-site from a production process, service activity, or routine cleanup;
- Generated from equipment decommissioning, spill cleanup, or remedial cleanup activity;
- Shipped off-site, including hazardous waste that was received from off-site (reported on WR Form) and subsequently shipped off-site without being treated or recycled on-site;
- Removed from on-site storage;
- Derived from the management of non-hazardous waste;
- Derived from the on-site treatment (including reclamation), disposal, or recycling of previously existing hazardous waste (i.e., a residual);
- Wastewater managed on-site;
- Exported directly to a foreign country;
- Waste recycled, with or without prior storage, in an on-site process. Note: when determining the amount of spent materials that are generated, reclaimed, and subsequently re-used on-site,

you need not include the spent material that is re-used, as long as such spent material has been counted once for the reporting year.

c. Radioactive wastes mixed with RCRA or State hazardous wastes must also be reported (unless excluded under 371.1(d)(7)).

For the purposes of this report, a unique waste stream is defined as having no more than one:

- Source Code (origin of hazardous waste)
- Form Code (physical form or chemical composition)
- Wastewater (see Appendix B), if any
- Remedial or Recycling Exempt (see Appendix B), if any

#### Waste Received (WR) Form

The annual hazardous waste report must include a completed WR form if, during the calendar year being reported, the Site received RCRA or New York State hazardous waste from off-site.

### Appendix B – Hazardous Waste Regulatory Fee

The “**Hazardous Waste Codes (State)**” field is used to determine if the hazardous waste includes hazardous wastewater which may be subject to a hazardous wastewater regulatory fee or if the hazardous waste which may be subject to a hazardous waste regulatory fee may be eligible for an exemption. Regulatory fees are pursuant to Environmental Conservation Law (ECL) Sections 72-0401 and 72-0402. The regulatory fee structure was modified through an amendment to the ECL effective January 1, 2010. The existing administrative procedures and processes in 6 NYCRR Parts 480, 481 and 483 will continue to be used for the administration of the Section 72-0402 fees. Regulatory fees are based on the quantity and type of hazardous waste and hazardous wastewater generated and/or managed during the calendar year being reported. The Hazardous Waste Annual or Biennial Report GM Form is used by NYSDEC in assessing hazardous waste regulatory fees. Errors or misrepresentation of quantities of hazardous waste may result in incorrect fees being billed.

#### 1. Wastewater

Select the **WW** code in the “**Hazardous Waste Codes (State)**” field if this hazardous waste contains:

- a) a minimum of 95 percent water by weight; and
- b) a maximum of one percent by weight of total organic carbon; and
- c) a maximum of one percent by weight of total suspended solids (i.e., total filterable solids).

#### 2. Regulatory Fee Exemptions

There are Remedial and Recycling exemptions from the regulatory fees. Only one of the two exemptions can be claimed on a GM Form, not both. There are strict requirements for the exemptions. Make sure all requirements are met before claiming any exemption. Submit a separate GM Form for each exemption type claimed.

- **Exempt Remedial**



Certain remedial wastes may qualify for the remedial exemption. Note that the exemption applies only to a very limited universe. The wastes listed in a. through g. below are the only remedial wastes exempted from regulatory fees. See ECL 72-0402(1)(d).

Exempt Remedial Wastes are:

- a. waste under a contract with NYSDEC, or with the NYSDEC's written approval and in compliance with NYSDEC regulations, or pursuant to an order of the NYSDEC, the USEPA or a court, related to the cleanup or remediation of a hazardous material or hazardous waste spill, discharge, or surficial cleanup, pursuant to the Environmental Conservation Law (ECL); or
- b. waste under a contract for, or with the NYSDEC's approval and in compliance with NYSDEC regulations for, the cleanup and removal of a petroleum spill or discharge, pursuant to subdivision seven of section 176 of the Navigation Law; or
- c. waste under the order of a court, NYSDEC or the Department of Health, or the USEPA related to an inactive hazardous waste disposal site pursuant to ECL Section 27-1313, Section 1389-b of the Public Health Law, or the Comprehensive Environmental Response, Compensation and Liability Act (42 U.S.C. 9601 et seq.); or
- d. waste voluntarily and without expectation of monetary compensation in accordance with subdivision one of ECL Section 27-1321; or
- e. waste under permit or order requiring corrective action pursuant to title nine of this Chapter, Title 27 of Article 71, or the Resource Conservation and Recovery Act (42 U.S.C. 6901 et seq.); or
- f. waste under a brownfield site cleanup agreement with the Department pursuant to ECL Section 27-1409; or
- g. waste under an environmental restoration project state assistance contract with the department pursuant to ECL Section 56-0503.

If the remedial exemption is claimed, select the **REM EX** code in the "**Hazardous Waste Codes (State)**" field and specify in the Comments, the basis for the specific exemption (e.g., Remedial Program, Site Number and Name, consent order number and date, etc.). If the information provided in the comments is not sufficient for NYSDEC to make a determination regarding eligibility for the remedial exemption, it may result in the exemption being denied.

● **Exempt Recycling**

ECL 72-0402 (1) (f) contains an exemption from regulatory fees for those recycling more than 90% of hazardous waste or hazardous wastewater. ECL 72-0402 (1) (f) states:

"In any case where a generator recycles more than ninety percent of the amount of hazardous waste or more than ninety percent of the amount of hazardous wastewater it produces in any calendar year, as certified to the commissioner, upon which a fee is imposed pursuant to this section, any such fee imposed or to be imposed in such case shall be determined based upon the net amount of hazardous waste or hazardous wastewater generated, as applicable, which is not so recycled in such calendar year, rather than upon the gross amount of hazardous waste or hazardous wastewater generated in such calendar year."

Hazardous waste must be addressed separately from hazardous wastewater, and vice versa. One must recycle more than 90% of the total amount of hazardous waste (other than wastewater) generated during the calendar year being reported to qualify for the exemption, and more than 90% of the total amount of hazardous wastewater generated during the calendar year being reported to qualify for the exemption.

If the recycling exemption is claimed, select the **RCY EX** code in the “**Hazardous Waste Codes (State)**” field and specify in the comments, the basis for the exemption: recovered value (i.e. metal content by weight %), energy content (BTUs per pound), specific recycling technology, etc. If the information provided in the comments is not sufficient for NYSDEC to make a determination regarding eligibility for the recycling exemption, it may result in the exemption being denied.

Information necessary to make a determination may include details of the waste streams and the recycled material, including their physical characteristics and detailed chemical compositions, hazardous constituents, how/where/when the wastes are being recycled (including certificates of recycling, when applicable), what constituents and what quantity and percentage of the constituents are being recycled, and the end use of the recycled constituents. In addition, how the recycled material is being managed as a commodity to prevent releases to the environment. A comparison of the amounts of the hazardous constituents in the recycled material to a similar raw material and information that documents the economic and other benefits from the recycling, would also be helpful. In the case of burning for energy recovery, information submitted must demonstrate that the waste 1) actually was burned for energy recovery (and was not burned in an incinerator or other disposal unit), 2) had significant fuel value (i.e., 5000 BTUs/lb or greater.), and 3) that the waste recycled contained no or minimal constituents that would be deleterious to and/or not treated by the burning process (e.g., mercury, and other materials that could harm the process and/or the environment).

The Management Method Codes H010, H020, H039, H050, H061, and H129 may apply for wastes for which the recycling exemption is claimed if, the above requirements are met. Note that not all wastes with these management method codes would qualify for the recycling exemption.