NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

2023 Hazardous Waste Biennial Report in North Carolina
Frequently Asked Questions

This document provides information on filing the 2023 Hazardous Waste Biennial Report in North Carolina.

Who must file the 2023 Hazardous Waste Biennial Report?

The following North Carolina sites must file a 2023 Hazardous Waste Biennial Report:
- **Large Quantity Generators** (LQG) who meet any of the following criteria in 2023:
  - The site generated, in any single calendar month, 1,000 kg (2,200 lbs.) or more of RCRA non-acute hazardous waste; or
  - The site generated, in any single calendar month, or accumulated at any time, more than 1 kg (2.2 lbs.) of RCRA acute hazardous waste; or
  - The site generated, in any single calendar month, or accumulated at any time, more than 100 kg (220 lbs.) of spill cleanup material contaminated with RCRA acute hazardous waste; **and/or**
- **Treated, Stored, Disposed, and/or Recycled** of RCRA hazardous wastes on site during 2023 (regardless of the hazardous waste generator category).
- **Received hazardous wastes** from off-site hazardous waste generators (even if waste was not stored before recycling); or
- Met the definition of a **reverse distributor** (as defined in 40 CFR 266.500, regardless of generator category).

When is the 2023 Hazardous Waste Biennial Report due?

The <u>deadline</u> for filing the electronic report is **March 1, 2024**. Sites may begin filing the report in RCRAInfo on January 2, 2024.

How is the 2023 Hazardous Waste Biennial Report Filed?

In North Carolina, the 2023 Hazardous Waste Biennial Report will be completed using EPA's RCRAInfo database. Go to the RCRAInfo website at this link: https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login

- Are you **already registered** in RCRAInfo?   Then sign in using the User ID and Password you created when you initially registered.
  - If you forgot your User ID or Password, click "Forgot User ID" or "Forgot Password." Please <u>do not</u> create another account.

- Do you have an <u>existing Central Data Exchange (CDX) account</u>? If yes, use your CDX credentials to sign in on this RCRAInfo webpage.

- If you are **not already registered in RCRAInfo** (and do not have an existing CDX account), go to page 5 of this document for the steps to register in RCRAInfo.

Then follow the instructions in the 2023 Hazardous Waste Biennial Report Tutorial at this link: https://www.deq.nc.gov/about/divisions/waste-management/hazardous-waste-section/forms/hazardous-waste-biennial-report

Who do I contact if I have questions?

- For questions about this document, RCRAInfo registration, and the 2023 Hazardous Waste Biennial Report:
  Jenny Patterson 919-270-3124   Jenny.Patterson@deq.nc.gov

- For questions about RCRAInfo (RCRAInfo registration, updating facility information):
  Andrew Minter 919-707-8265 Andrew.Minter@deq.nc.gov

- For questions about **Invoices** please contact:
  Alby Alexander, Accounting Clerk: 919-707-8286   Alby.Alexander@deq.nc.gov
  Laura Alexander, Supervisor of Financial and Information Unit: 919-707-8214 Laura.Alexander@deq.nc.gov

- For **site specific hazardous waste question**s, contact your local Hazardous Waste Section Inspector (contact information and region provided on the map at this link): https://www.deq.nc.gov/compliance-map-inspector/download?attachment?attachment

What are some common mistakes that are made when filing the biennial report?

- **Wrong Management Method Codes and/or wrong EPA ID Number for Off-Site Shipment:** The site and the Management Method Code used on the GM form (for Off-Site Shipment) should be that of the destination facility that signs your completed manifest even if the waste is subsequently sent on for further treatment. The management method code (the code always starts with an "H" followed by three numbers) can be found at the bottom of your completed manifest.   Sometimes, at the end of the year or for biennial reporting purposes, a summary of waste shipments is provided by your disposal company. The summary may include both intermediate and final destination facilities and the corresponding management method codes. Be sure to report the site and the management method code that is noted on your manifest (which may not always be the final destination/management method code).

- **Not Reporting the Current Hazardous Waste Generator Category**: Report the hazardous waste generator category of your site (Item 10.A.1 of the Site Identification portion of the Biennial Report) at the time the report is filed. Do not report the hazardous waste generator category for the site during the Biennial Report reporting period. For example, your site was a large quantity generator in 2023 resulting in the requirement for the site to file a Biennial Report. If the site is actually operating as a very small or small quantity generator at the time the Biennial Report is filed in 2024, Item 10.A.1 of the Site Identification form (of the Biennial Report) should reflect the CURRENT hazardous waste generator category (as a very small or small quantity generator).

- **Reporting Two Years Worth of Data instead of One:** Sometimes the "Biennial Report" is misunderstood to be a report that includes two years worth of data or a report that is filed twice a year. In North Carolina, the biennial report is a report that is due every other year that includes data for the previous year. For example:
  - For sites required to file the Biennial Report, the next report is due on March 1, 2024. The "reporting year" is calendar year (Jan. through Dec.) 2023.

- For facilities required to file a 2021 Hazardous Waste Report this report was due on March 1, 2022. The "reporting year" was calendar year (Jan. through Dec.) 2021.

- **Manifests for Reporting Year not on e-Manifest:** New for the 2023 Biennial Report, is a validation check upon submittal of the report in RCRAInfo. The amount of *reported* hazardous waste shipped on the biennial report is now compared to the amount of hazardous waste shipped in the reporting year from the manifests in the e-Manifest system. If the two amounts differ by more than 10% you will receive a validation error that must be corrected or an adequate explanation for the difference must be provided. Your report will not be processed until this manifest issue is resolved or an adequate explanation for the discrepancy can be provided. If you receive this validation error (screen shot below):
    - Go to the RCRAInfo e-Manifest system and ensure all of your manifests for the reporting year are in e-Manifest. If there are manifests missing in e-manifests, contact your treatment, storage, and disposal facility and ask them to upload the missing manifest(s).
    - If all manifests are in the e-Manifest system, review the manifests in e-Manifest for any errors. Sometimes, there can be data entry errors made when the disposal company is entering information from the paper manifest into the electronic format. Compare the paper copy of the manifest to the electronic version to ensure there were no data entry errors. Typos on the manifest for the amounts of waste or the unit of measure (e.g., gallons reported instead of pounds) can result in this type of RCRAInfo Biennial Report validation error.
    - A validation error may be the result of your waste being reported in gallons on the manifest. e-Manifest has a default setting of using 8.34 lbs./gallon when converting gallons to pounds. If your waste is reported on the manifest in gallons, you will also need to know the weight of the waste and/or the specific gravity to be able to justify the RCRAInfo validation error.

Potential Issues

Validation issues were found with this submission. The list below contains all issues and the explanation provided by the industry submitter.

Expand/Collapse Issues

Issue Description	BR Form	Page Num	Explanation
The total quantity shipped reported differs by more than 10% from your manifest submissions.	GM		

- **Making updates to site information on the Site Identification Form of the Biennial Report:** Any updates made to hazardous waste site information on the Site Identification portion of the Biennial Report will delay the processing/approval of your report. Additionally, since it takes the Hazardous Waste Section months to review all of the Biennial Reports, any updates made to the hazardous waste site information will not show in RCRAInfo until the Biennial Report is approved. Please do the following if you need to update your site's hazardous waste information.
    - If your site is a hazardous waste treatment, storage, and disposal facility, most site hazardous waste site information updates need to be made by submitting a hard copy RCRA Part A to your Hazardous Waste Section Facility Project Manager. Please do not make any updates to site information (from the last approved submission) on the Site Identification form portion of the Biennial Report. Submit a hard copy Part A form to your Hazardous Waste Section Project Manager to make any necessary updates after your biennial report has been approved and appears on the RCRAInfo system.
    - If your site is a hazardous waste generator only (i.e., not a treatment, storage, and disposal facility) and you need to make updates to your hazardous waste site information (e.g., site contact, waste codes, generator category, etc.) submit an electronic notification in the myRCRAid module to make any hazardous waste site information updates *before* creating your biennial report. When you create your Biennial Report check the Site Information portion of the report to ensure the updates you had submitted are showing as the current site information.

What do I do if I think my facility designation of large quantity generator or as a hazardous waste treatment, storage, or disposal facility was in error and/or I do not think I need to complete the 2023 Hazardous Waste Biennial Report?

Please send an email to Jenny.Patterson@deq.nc.gov with your facility name and EPA ID Number, your contact information, and the reason you think this status designation is in error and/or an explanation on why you think you are not subject to the requirement to file the 2023 Hazardous Waste Biennial Report.

Do I need to complete the Off-site Identification Form (OI Form) of the Biennial Report?

No, North Carolina facilities are not required to complete/submit the OI Form. The OI Form captures the names and addresses of off-site installations and transporters. The OI information is optional on a national level and in North Carolina.

The hazardous waste generator category of my site changed in/since 2023. How do I report this on the biennial report?

- You will report your <u>CURRENT</u> Hazardous Waste Generator category as of the date of submitting your Hazardous Waste Biennial Report on the Site Identification (ID) Form in Item 10.A.1 – Generator of Hazardous Waste.
- Your current hazardous waste generator category may be different from the category during the report year that requires you to file the Hazardous Waste Report.

My North Carolina facility notified as a large quantity generator (LQG) for 2023 but did not actually generate LQG amounts of hazardous waste during this time. Do I still need to file a Biennial Report?

Maybe. You may submit copies of the manifests to the Hazardous Waste Section to prove the facility never operated as a large quantity generator and request to have the report requirement waived. Or you may submit the Biennial Report and note in the Comment section of the Site ID Form that the facility did not generate large quantity generator amounts of hazardous waste and indicate the amount(s) of hazardous waste generated throughout 2023 to show the site did not operate as LQG quantity (to explain missing or incomplete GM forms)

Send copies of manifests and request a waiver to:
      Jenny Patterson at Jenny.Patterson@deq.nc.gov

My North Carolina facility notified as a large quantity generator for 2023 but did not actually generate any hazardous waste during this time. Do I still need to file a Biennial Report?

If no hazardous waste was generated/managed during the 2023 reporting cycle, you may submit the Biennial Report with a GM form that shows zero (0) hazardous waste generated/managed. Be sure to note in the Comments section of the Site ID Form that no hazardous waste was generated (to explain the incomplete GM form).

My North Carolina facility notified as a small quantity generator (or very small quantity generator) and operated as a small (or very small quantity generator) in 2023. Do I still need to file a Biennial Report?

No. North Carolina facilities that have notified and operated as small quantity generators and very small quantity generators in 2023 are not required to file a Biennial Report (unless they operated as a large quantity generator and/or treatment, storage, and disposal facility any time during 2023). See the first question/answer on page 1: "*Who must file the 2023 Hazardous Waste Biennial Report?*"

My North Carolina facility only operated as a large quantity generator (and/or treatment, storage, and disposal facility) for a short period of time during calendar year 2023. Do I still need to file a Biennial Report?

Yes. A facility that operated as a large quantity generator (and/or treatment, storage, and disposal facility) at any time for any length of time in 2023 is required to file the Biennial Report.

My North Carolina facility operated as a large quantity generator at the beginning of 2023 but renotified and is currently a small quantity generator (or very small quantity generator or not a generator). Do I still need to file a Biennial Report?

Yes, if a facility operated as a large quantity generator and/or treatment, storage, and disposal facility in 2023 (at any time for any length of time) but is currently a SQG (or a VSQG or not a generator), they are required to file the Biennial Report.

My North Carolina facility notified as a "Short Term Generator" and generated large quantity generator amounts of hazardous waste during 2023. Do I still need to file a Biennial Report?

Yes. A facility that operated as a large quantity generator (and/or treatment, storage, and disposal facility) at any time for any length of time in 2023 is required to file the Biennial Report. This includes facilities that notified as a Short Term Generator (that generated large quantity generator amounts of hazardous waste).

My North Carolina facility notified as an "Episodic Generator" and generated large quantity generator amounts of hazardous waste during 2023. Do I still need to file a Biennial Report?

No. If your facility notified as an Episodic Generator (by marking Section 13 of the Site ID Form) in 2023 and complied with the Episodic Generator provisions in 40 CFR 262 Subpart L, your site is not required to file a 2023 Hazardous Waste Biennial Report.

My site's address has changed. How do I report this on the biennial report?

- If your site has moved to a new location, since EPA ID numbers remain with the site, you must obtain a new EPA ID number for the new location (and deactivate the old site's EPA ID number).
- If you need to correct site location information (in Section 4 of the Stie ID Form) due to a typo or 911/City/County numbering/road name changes, be sure to indicate in Section 18 (Comments) that the site has not actually moved to a new location and the update to the site location information was to correct a typo or to update the address due to 911/City/County changes to the address.

My site is a large quantity generator healthcare facility, a reverse distributor, or a treatment, storage, and disposal (TSD) facility receiving hazardous waste pharmaceuticals. Do I report hazardous waste pharmaceuticals on the biennial report?

- Hazardous waste pharmaceuticals (both non-creditable and potentially creditable) do not need to be reported by a healthcare facility on a GM form on the biennial report. Healthcare facilities (that are large quantity generators) must only report non-pharmaceutical hazardous waste on the biennial report.
    - LQG healthcare facilities must remember to notify of Pharmaceutical Activities (by marking Section 11.D of the Site ID form) as "Healthcare Facility" within 60 days of the effective date of 40 CFR 266 Subpart P (effective in NC July 1, 2020), or within 60 days of the site becoming subject to 40 CFR 266 Subpart P. The site can notify of the Pharmaceutical Activity as part of the biennial report submission.
- Reverse distributors will report evaluated hazardous waste pharmaceuticals accumulated on-site, that was shipped off-site to a designated facility in 2023. However, reverse distributors do not report the potentially creditable hazardous waste pharmaceuticals received at the facility.

My site manages hazardous secondary materials managed under the Generator Controlled Exclusion or the Transfer Based Exclusion. How do I report these on the biennial report?

- Hazardous secondary material(s) managed under the Generator Controlled Exclusion (40 CFR 261.4(a)(23)) or the Transfer Based Exclusion (40 CFR 261.4(a)(24)) does not need to be reported on the GM form(s) of the biennial report.
- The hazardous secondary material management does, however, need to be reported in Section 16 of the Site ID Form by March 1, 2024.
- A large quantity generator submitting a biennial report can also notify of the hazardous secondary material management activity as part of the biennial report submission.

How do I Register in RCRAInfo?

- If you are already registered in RCRAInfo you do not need to review this answer. Sign in to RCRAInfo using your existing User ID and Password. Then follow the instructions in the 2023 Hazardous Waste Biennial Report Tutorial at this link: https://deq.nc.gov/about/divisions/waste-management/hazardous-waste-section/reports-and-plans/hazardous-waste-biennial-report

- If your site has an existing EPA Identification (ID) number associated with the site, continue below.

- If your site does not already have EPA ID number or if you are unsure whether your site has an EPA ID number, please contact Jenny Patterson 919-270-3124 or by email: Jenny.Patterson@deq.nc.gov

Each person using RCRAInfo must register for their own account. Sharing of accounts is not allowed. Multiple people with RCRAInfo accounts can link to one site and view site information associated with the site in RCRAInfo and make updates (depending on the permission level of each user).

Registering in RCRAInfo for a site with an existing EPA ID number:

1) Go to the RCRAInfo website at this link: https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login

If you are not already registered in RCRAInfo (and do not have an existing CDX account), click "Register."

Do you have an existing CDX account? If yes, use your CDX credentials to sign in on the RCRAInfo webpage.

Are you already registered in RCRAInfo? Then sign in using the User ID and Password you created.

2) Select "Industry User"
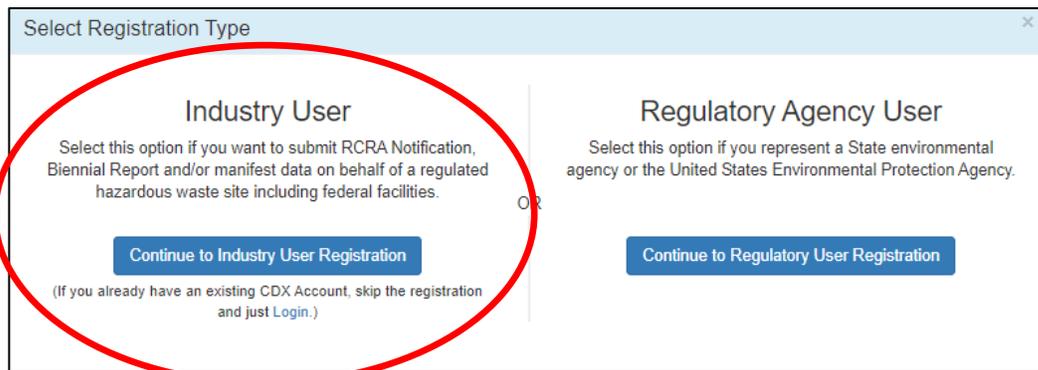
How do I Register in RCRAInfo? (continued)

3) Enter your user information including your Title, Full Legal Name (first and last name).
   The fields marked with the red asterisks are required fields.
   Once you have provided the required information click the "Next" button.

4) Next you will create a User ID and password to be associated with your account. You must verify your
   password by re-entering it in the Password Verification field.

The **User ID** must adhere to the following rules:
- Must be between 8 and 160 characters
- Cannot contain spaces
- Cannot contain special characters except period (.), hyphen (-), underscore (_), or at (@).
- Cannot be all numbers
- Must be unique

Passwords must meet the following rules:
- Must be between 8 and 15 characters
- Must start with a letter
- Must contain at least one lower and upper case letter
- Must contain at least one number
- Cannot contain your user ID or the word "password"
- Cannot match previous 5 passwords

<u>Make sure you can remember your password.</u> You will need to enter your password several
times during the registration process and at the end of the process when the notification is submitted.

How do I Register in RCRAInfo? (continued)

5) Select Security Questions/Answers to be able to reset your password:
   - You must select three (3) questions and provide answers to these questions.
   - These questions will be used in the event that you need to have your password reset.
   - Note that the answers you provide are case-sensitive.
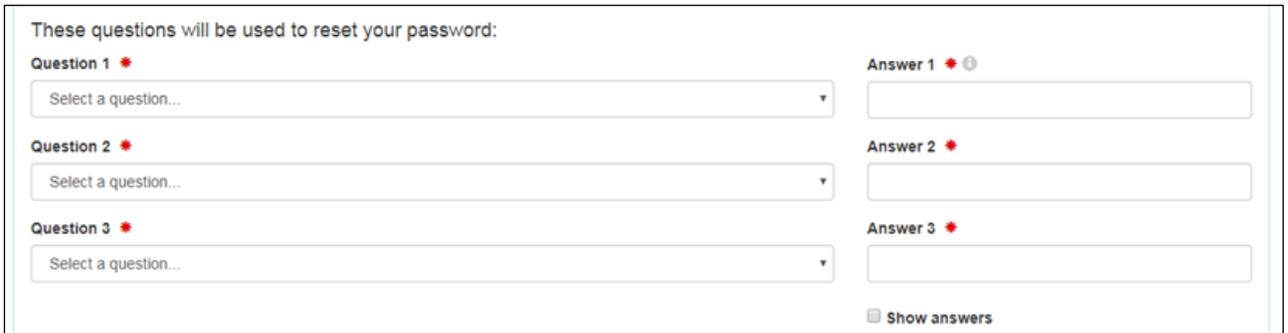
These questions will be used to reset your password:

Question 1 *	Answer 1 *
Select a question... ▾	
Question 2 *	Answer 2 *
Select a question... ▾	
Question 3 *	Answer 3 *
Select a question... ▾	
	☐ Show answers

6) Click the "Terms and Conditions" link to review the terms and conditions associated with this account. Carefully read the Terms and Conditions associated with creating and using this account.

   Click the checkbox next to "Agree to Terms and Conditions" to accept the terms and conditions stipulated.
   If you do not agree with the Terms and Conditions, you will not be able to create an account.

   Click the "Next" button to continue.

☐ Agree to the **Terms and Conditions**

Next

7) Enter Organization and Contact Information
   - You will be asked to provide the organization or company for which you work for and some additional contact information including Job Title, phone number, and email address (the email address provided should be your work email).
   - Once you have provided all of the required information, indicated by the red asterisks, click the "Send Verification Code via Email" button.
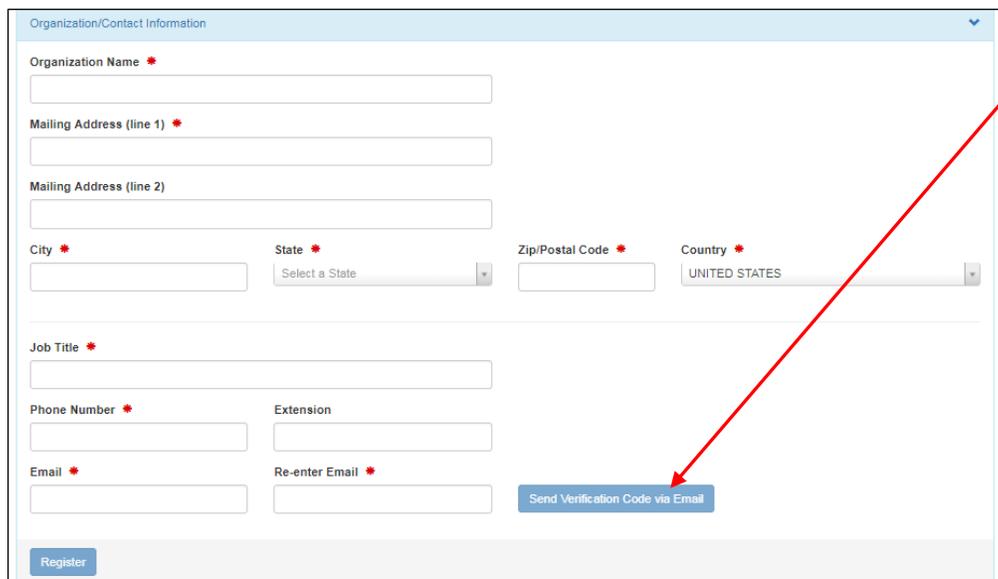
Organization/Contact Information

Organization Name *

Mailing Address (line 1) *

Mailing Address (line 2)

| City * | State * | Zip/Postal Code * | Country * |
| | Select a State ▾ | | UNITED STATES ▾ |

Job Title *

| Phone Number * | Extension |

| Email * | Re-enter Email * | Send Verification Code via Email |

Register

8) Verification Email
   - An email will be sent to the email address provided in Step 7 above.
   - This email will contain a verification code that you will enter to complete your account creation.
   - If you provided an invalid email address or an email address that you do not have access to, you will not be able to complete your account creation.

9) Validate Email – Verification Code
   - Enter the Verification Code.
   - Then click the "Register" button to complete the registration process.

10) Go to "**My Sites**"
    Click on blue "**Select Existing Site**" button.

11) Then type the EPA ID number for the site (that was provided in the email you received) in the "Site ID" box. Do not enter any other information. Click the "Search" button.
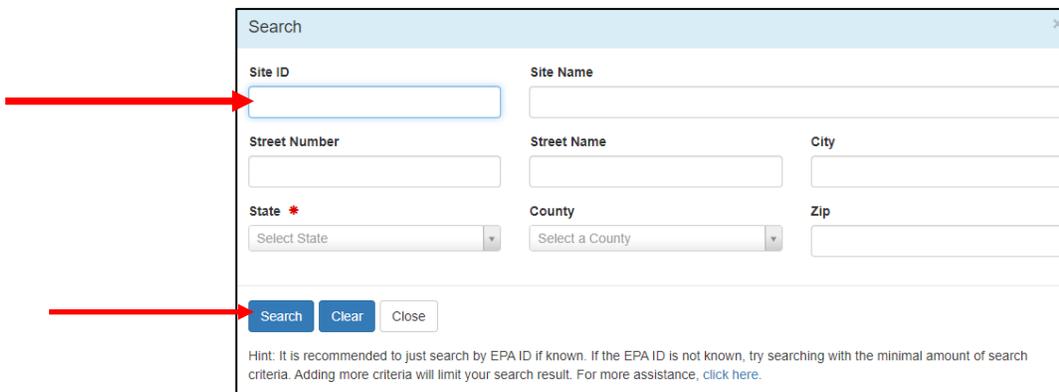
How do I Register in RCRAInfo? (continued)

12) The search results should show your site. (The below is just an example screen shot). If the Search was not successful, double check the EPA ID number entered in the Site ID box. If the search was successful and the address is for the site you wish to request access to, click the little box to the left of the Site ID number (to check it). And click "Request Access."

13) Select your RCRAInfo permission level from the drop-down menu in "Permission Level" for each module.
- You may keep the "Site Management" module as "None" (changing this permission level to "Active" makes you responsible to approve anyone else that registers in RCRAInfo for your site).
- It is recommended you select (at a minimum) "**Certifier**" permission level for the "Biennial Report," "myRCRAid," and the "e-Manifest" modules. Unless you are preparing the report for someone else to certify (if this is the case, select "Preparer" for the "Biennial Report." Then click "Send Request."

Level of Permission	Definition
None	The user has no permissions for these sites within the module specified.
Viewer	The user can view the data for these sites within the module specified but cannot enter or change the information in any way.
Preparer	The user can view and enter data for these sites within the module specified but cannot sign and submit the information to the regulatory authority.
Certifier	The user can view, prepare, sign, and submit the information for these sites to the regulatory authority. This user is required to obtain an Electronic Signature Agreement.
Site Manager	The user can view, prepare, sign, and submit information as well as register other users at their facility and submit data for any industry application module (myRCRAid, Biennial Report, and e-Manifest). This user is required to obtain an Electronic Signature Agreement.

How do I Register in RCRAInfo? (continued)

The request will automatically be sent for review and approval by our NCDEQ, Hazardous Waste Section RCRAInfo Administrator.   Review and approval of the permission level and access to the site typically takes a few hours but could take a few days.

14) Log out of RCRAInfo by clicking on your name in the upper right corner. Then click on "Log Out."
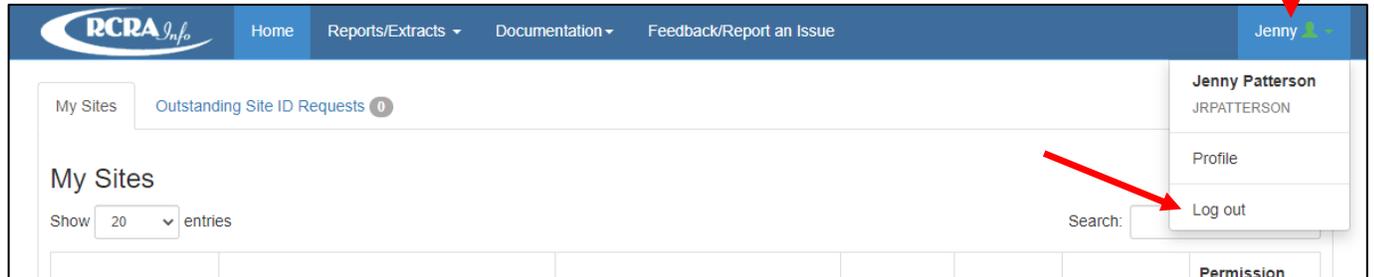
15) The sites you requested access to will appear in the My Sites list but will have a "pending" status until you are approved (by NCDEQ, Hazardous Waste Section) for these sites. You will receive an email from RCRAInfo (from rcrainfo.admin@epa.gov) indicating your access was approved/granted for the site.

16) Go to the RCRAInfo website at this link: https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login
      You have already started the registration process in RCRAInfo. (Thank you!)

17) Enter your User ID and Password.
      - If you cannot remember your User ID or Password, please click on "Forgot User ID?" or "Forgot Password?"   (Please do not create another account.)
      - If it has been a while since you signed in to RCRAInfo, you will be prompted to update your password.
      - You will be asked for your password at the very end of the notification process so make sure you can remember it. It is also case sensitive.

18) Once you log back into RCRAInfo you will automatically be taken to the **Electronic Signature Agreement** (so you can electronically sign documents in the RCRAInfo system).

      First select your five security questions/answers (see screen shot on next page). You will be asked one of these questions at the end of the notification process (to verify your signature) so be sure to remember your responses. They are case sensitive.   When you are done, click "Next."

      If you selected the "Preparer" permission level, you will not complete the Electronic Signature Agreement. However, you must have a person register for your site as a "Certifier" to be able to submit the report.

How do I Register in RCRAInfo? (continued)

19) If you would like to complete the electronic version of the Identity Proofing (to complete the Electronic Signature Agreement) keep the response to the first question as "Yes."   The benefit of the electronic Identity Proofing is it provides immediate approval and ability to sign the forms in RCRAInfo.

The alternative is switching the response to the first question to "No" and printing a paper form, completing it, and mailing the form to a person in Raleigh (name and address is on the form). (If you choose the paper form, you will also need to scan it and email it to Melodi.Deaver@deq.nc.gov) to have a faster approval until your hard copy is received in the mail.   If you select the electronic Identity Proofing, you do not need to print, scan, or mail any forms.

How do I Register in RCRAInfo? (continued)

You will be asked to provide industry standard information typically used by banking systems and credit reporting agencies. This information is discarded after the identity proofing is complete (so your home address, birthdate and last four of your social security number will not be stored in the RCRAInfo system). Enter the information accurately on this screen. If you do not enter the information accurately (e.g., your home address and not your work address) you will not be approved electronically and will need to submit print and submit the paper signature agreement. Once done, click "Verify and Sign."

The information you provided will be immediately evaluated by a third-party (LexisNexis). If the information meets a minimum score needed for identity proofing, your electronic signature agreement will be recorded (approved) and you will immediately be able to submit and sign information for the sites and the modules for which you have been granted "Certifier" permission level.

20) **Log out of RCRAInfo** one more time by clicking on your name in the upper right corner. Then click on "Log Out."
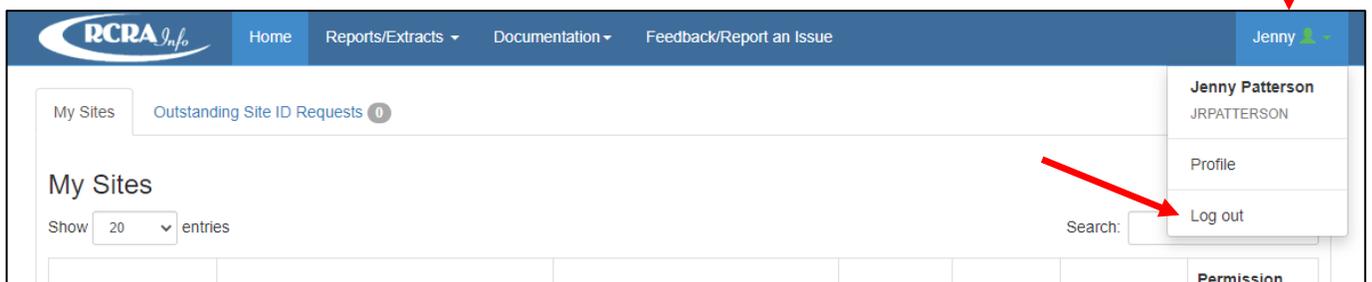
21) **Log back into RCRAInfo.** See steps 16 (for the link to RCRAInfo) and Step 17 for log in instructions.

22) Once you are logged into RCRAInfo, you will see "**My Sites**"
    Click on blue hyperlinked name of the site.
    (the below screen shot is an example. The Site Name in your account will be the site or sites for which you have permission to access)

23) Then follow the instructions in the 2023 Hazardous Waste Biennial Report Tutorial at this link:
    https://www.deq.nc.gov/about/divisions/waste-management/hazardous-waste-section/forms/hazardous-waste-biennial-report

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Who do I contact if I have questions?

- For questions about this document, RCRAInfo registration, and the 2023 Hazardous Waste Biennial Report:
    Jenny Patterson 919-270-3124   Jenny.Patterson@deq.nc.gov

- For questions about RCRAInfo (RCRAInfo registration, updating facility information):
    Andrew Minter 919-707-8265 Andrew.Minter@deq.nc.gov

- For questions about **Invoices** please contact:
    Alby Alexander, Accounting Clerk: 919-707-8286   Alby.Alexander@deq.nc.gov
    Laura Alexander, Supervisor of Financial and Information Unit: 919-707-8214 Laura.Alexander@deq.nc.gov

- For **site specific hazardous waste question**s, contact your local Hazardous Waste Section Inspector (contact information and region provided on the map at this link):
    https://www.deq.nc.gov/compliance-map-inspector/download?attachment?attachment