



2025 Hazardous Waste Biennial Report in North Carolina Frequently Asked Questions

This document provides information on filing the 2025 Hazardous Waste Biennial Report in North Carolina.

Who must file the 2025 Hazardous Waste Biennial Report?

The following North Carolina sites must file a 2025 Hazardous Waste Biennial Report:

- **Large Quantity Generators** (LQG) who meet any of the following criteria in 2025:
 - 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 2025 (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 2025 Hazardous Waste Biennial Report due?

The deadline for filing the electronic report is **March 1, 2026**. Sites may begin filing the report in RCRAInfo on January 2, 2026.

How is the 2025 Hazardous Waste Biennial Report Filed?

In North Carolina, the 2025 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>

RCRAInfo Sign In

RCRAInfo is EPA's comprehensive information system providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976, the Hazardous and Solid Waste Amendments (HSWA) of 1984, and the Hazardous Waste Electronic Manifest Establishment Act of 2012. The system is used to track information provided by the regulated community concerning the generation, shipment, treatment, and disposal of hazardous wastes, as well as significant milestones of State/EPA activity supporting program planning, implementation, and accomplishment reporting. States may use RCRAInfo for some or all aspects of program implementation support, or may use their own system which transmits required data to EPA.

User ID

Continue

Register

Forgot User ID?

- Are you **already registered** in RCRAInfo and have already set up your Login.gov account for multi-factor authentication? Then sign in using the User ID you created when you initially registered.
 - If you forgot your User ID, click "Forgot User ID." Please do not create another account.
Note: The "Forgot User ID" feature applies ONLY to RCRAInfo Industry IDs. You will be prompted to provide the email address associated with your User ID and confirm that you are the original registrant and owner of the account.

- Do you have an existing Central Data Exchange (CDX) account? 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) follow the instructions (steps 1-19) in the Guide for RCRAInfo Registration and Notification Submittal at this link: <https://www.deq.nc.gov/waste-management/dwm/hw/8700-guidelines/guide-rcrainfo-registration-and-notification/download?attachment>
- Then follow the instructions in the 2025 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 2025 Hazardous Waste Biennial Report:
Jenny Patterson 919-270-3124 Jenny.Patterson@deq.nc.gov
- For questions about RCRAInfo (RCRAInfo registration, updating facility information):
Arianna Trotter 919-707-8265 Arianna.Trotter@deq.nc.gov
- For questions about **Invoices** 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 questions**, 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 2025 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 2026, 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 term "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, 2026. The "reporting year" is calendar year (Jan. through Dec.) 2025.
 - For facilities required to file a 2023 Hazardous Waste Report this report was due on March 1, 2024. The "reporting year" was calendar year (Jan. through Dec.) 2023.
- Manifests for Reporting Year not on e-Manifest:** Beginning with the 2023 Biennial Report, was 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 (TSDf) and ask them to upload the missing manifest(s). The TSDf is required to upload your hazardous waste manifests 30 days from the day of receipt of the hazardous waste.
 - 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. Wait until the myRCRAid electronic notification is accepted into the RCRAInfo system before submitting 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 2025 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 2025 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 collects the name and address information of the sites (generators, transporters, and/or receiving facilities) identified within the Hazardous Waste Report. Since the OI Form is not required to be submitted, the OI form option has been deactivated when North Carolina sites file the 2025 biennial report.

The hazardous waste generator category of my site changed in/since 2025. How do I report this on the biennial report?

- You will report your CURRENT 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 2025 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 2025 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 2025 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 2025 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 2025. 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 2025 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 2025). See the first question/answer on page 1: "[Who must file the 2025 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 2025. 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 2025 is required to file the Biennial Report.

My North Carolina facility operated as a large quantity generator at the beginning of 2025 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 2025 (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 2025. 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 2025 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 2025. 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 2025 and complied with the Episodic Generator provisions in 40 CFR 262 Subpart L, your site is not required to file a 2025 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 Site 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 2025. 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, 2026.
- 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.

Who do I contact if I have questions?

- For questions about this document, RCRAInfo registration, and the 2025 Hazardous Waste Biennial Report:
Jenny Patterson 919-270-3124 Jenny.Patterson@deq.nc.gov
- For questions about RCRAInfo (RCRAInfo registration, updating facility information):
Arianna Trotter 919-707-8265 Arianna.Trotter@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 questions**, 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>