BIENNIAL REPORTING GUIDE

This guide is based on questions DEEP receives. It does not cover every detail of report preparation, but provides the basic information that everyone required to submit a Biennial Report should know. See the "Detailed Guidance" section below for details.

Table of Contents:

What is a Biennial Report?
- A Biennial Hazardous Waste Report (aka "Biennial Report" or "BR") is a summary of hazardous waste activity at certain RCRA sites.
- The report for Connecticut contains:
    - "GM Forms" for waste generation & management (most sites have this activity).
    - "WR Forms" for waste received from offsite (few sites have this activity).
    - "Site Identification Form" to report changes in contact info, generator status, etc.
    - "OI Forms" – not required in CT, although other states may require them.
- A separate Biennial Report must be submitted for each site.
- BRs from all 50 states are compiled by EPA and published in the National Biennial RCRA Hazardous Waste Report.

Who Must Report?

- Large Quantity Generators ("LQG").
- Treatment Storage or Disposal Facilities ("TSDF").
- Any site that generated or accumulated LQG amounts (i.e. > 1,000 kg of hazardous waste, or 1 kg of **acute hazardous waste**) in one or more calendar months during the reporting year, including **episodic generation events**, remediation activities, or any other event or activity that generates LQG amounts of hazardous waste.
- You are not required to submit a Biennial Report in these less common situations:
  - *IF* your **generator status category** changed from LQG to Small Quantity Generator or Conditionally Exempt Small Quantity Generator, and you operated in that category during the entire odd numbered reporting year.
    - In this case, change your status using the "myRCRAid" Industry App. This will stop:
      - ❖ Future Biennial Report notices, and
      - ❖ Billing for LQG annual fees by DEEP.
      - ❖ You may wish to use the new "BR Exempt" feature described below under "Before Starting Your Report"
  - *IF* your site is a TSDF in closure or post-closure and did not manage any hazardous waste during the odd numbered reporting year.
    - In this case, submit a Site ID Form using the myRCRAid Industry App, with a comment written in Sec. 18: "Submitted in lieu of a Biennial Report. Site is in closure/post-closure and did not operate as a Large Quantity Generator or actively manage waste as a TSDF during the 2025 reporting year."
- See also the "Glossary of Some Terms Used on the BR Webpage".

When to Report?

- March 1ˢᵗ of even numbered years, every two years.
- Data being reported is from the preceding odd numbered year.
- Example: **March 1, 2026 deadline for the 2025 Biennial Report year**
- Connecticut does not require such reports annually, like some other states.
- A thirty-day extension will be granted to anyone who asks for one by notifying the DEEP in writing *before* the deadline. Send an email to: **DEEP.RCRAHelp@ct.gov**

Before Starting Your Report

- Biennial Reports must be prepared and submitted electronically.
  - Do not use "paper" forms from an EPA website. They are incorrect for Connecticut.
  - Use the on-line EPA database called "RCRAInfo."
    - The Biennial Report Industry Application is a subsection of RCRAInfo created for the regulated community to prepare and submit BR.

- Do not use Internet Explorer web browser with RCRAInfo. Chrome, Edge, Firefox or Safari work well.
- CT requirements are unchanged since the last report.
- The forms in the BR App are consistent with the regulations that CT has adopted. The forms do not require information for regulations CT has not yet adopted.
  - Some examples of requirements you will not see for CT in the BR App:
    - The **Pharmaceutical Rule** and the PHRM waste code;
    - The provisions of the **Generator Improvements Rule**, including Episodic Generation, VSQG to LQG Consolidation, and SQG Re-Notification requirements; and,
    - Requirements for **Hazardous Secondary Materials**.
- Use the "BR Exempt" feature **IF** you previously submitted BR, but are no longer required to do so.
  - The "BR Exempt" feature allows you to save time and submit only a "Site ID Form" to affirmatively report that you are no longer required to submit a BR (so that DEEP or EPA don't wonder if you forgot to report).
  - Click on "Create New Submission" to go to the Create BR screen.
  - Go to the text below the two blue buttons that starts with "OPTION". Note: in the screenshot below the text is outlined in red. It is not outlined in RCRAInfo.
  - Follow the directions about why you are no longer required to submit a BR.
  - You may also change your generator status or make other updates as needed.
  - You will still need to sign and submit the Site ID Form, but nothing else.

(Note: While this image is from the 2021 Biennial Report, the guidance is the same for the 2025 Biennial Report.)

- **Consultants**:
  - Please ensure your client has someone with "Site Manager" permissions in place in RCRAInfo before you request access to your client's site in RCRAInfo.
  - The Site Manager can approve your access to RCRAInfo, and will have access to sign and submit the BR you prepare.

- **Two Changes Required Since 2023**

  - **New "Data Validation" Step**:
    - RCRAInfo will perform data error checks before you submit your BR.
    - You will need to click the "Validate" button before you sign and submit.
    - Validation issues are categorized as "Errors" or "Warnings".
      - Errors MUST be corrected before you can submit the report.
      - Warnings:
        - you may correct the data, if there is a data error, **OR**
        - you may provide an explanation, in the explanation box provided, to indicate why the data issue is not an error.
      - Help for Data Validation is in RCRAInfo under "Documentation"
      - Note that Management Method Codes are sometimes not "pulled forward" by RCRAInfo. This may create a validation on error.
      - ➢ For questions about missing manifests or incorrect data manifest data, please contact DEEP. DEEP may refer you to your TSDF, as they are responsible for entering your manifest in RCRAInfo and ensuring data quality.

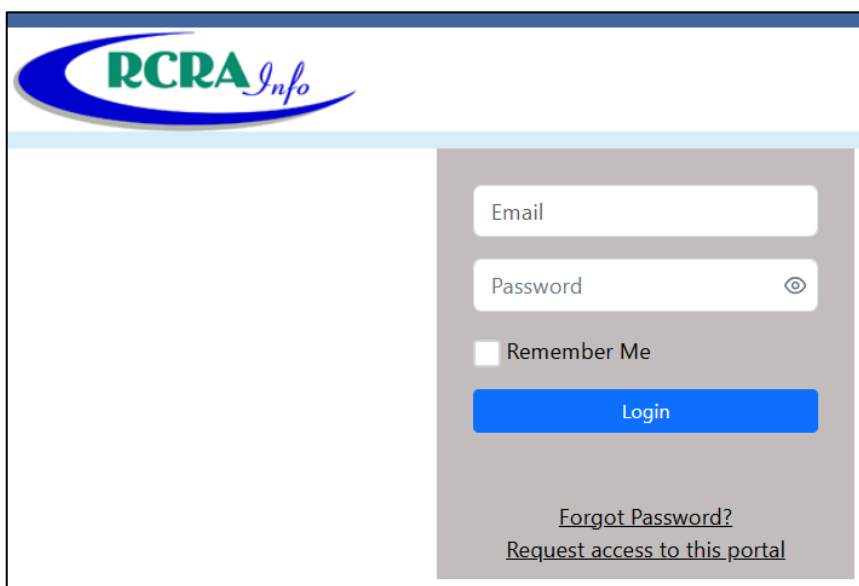 - **Management Method Code Changes**
    - Four management method codes were added:
      - H042 thermal desorption,
      - H113 stabilization,
      - H136 discharge to sewer/POTW, and
      - H137 discharge with NPDES permit
    - One code was removed (H135). The acceptable "treatment" codes are H136 or H137, not H135. The management method code of H135 was disabled for e-Manifest in mid-December 2023.
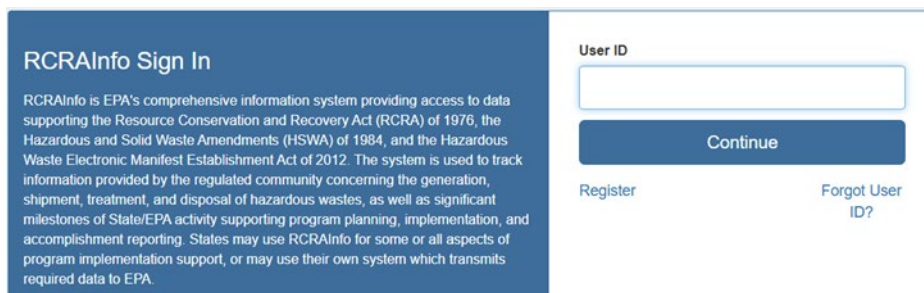
Preparing and Submitting Your Biennial Report

All BRs start online with the **RCRAInfo Sign-In page**: https://rcrainfo.epa.gov/rcrainfoprod/.

- **New Preparers**
  - Start by reviewing one or both of these information sources:
    - **DEEP's Fact Sheet "Using EPA's Industry Applications in RCRAInfo"**:
    - **EPA Learning Zen**: an excellent set of videos (~ 20 min.) on how to create a RCRAInfo account and use BR App and other Industry Apps.
      - ❖ You will need to request access to Learning Zen.
      - ❖ Use the link at the bottom of the grey window, below the log-in button ("Request access to this portal").

  - Create or open an existing account in RCRAInfo at the **RCRAInfo Sign-In page**.
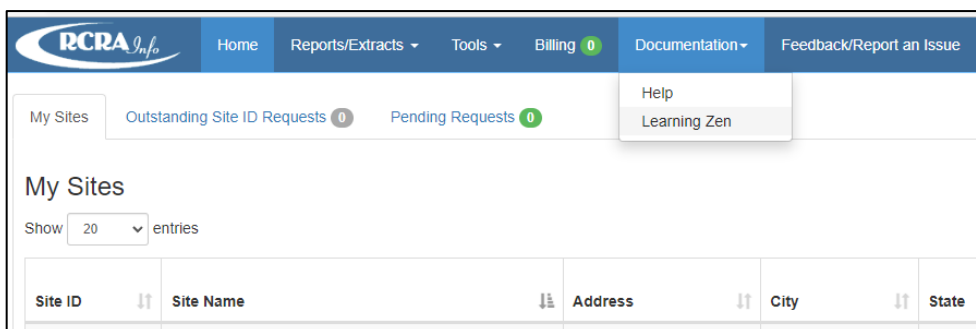

  - Add site(s) and the permissions you need.
  - Next use the guidance below under "All Preparers" and "Detailed Guidance."

- **Returning Preparers**
  - Retrieve a forgotten username or reset passwords on the RCRAInfo Sign-In page.
  - If you did not report in 2024 for the 2023 reporting year, see the section of this guidance on page 4 entitled "Two Changes Required Since 2023".
  - Returning Users may not need more guidance, as the BR App is user friendly.
  - For "refresher level" guidance, see the section below: "All Preparers"
  - See also the "Detailed Guidance" section further below.

- **All Preparers**
  - **Using the BR App**
    - Once you have accessed your site, click on the Biennial Report tab.
    - Then click "Create a New Submission."
    - Choose "Upload a File" or "Continue to Data Entry."
      - ❖ Data Entry is the best choice for most users to add data to the BR.
      - ❖ Uploading a File is a complex process for users with many GM or WR forms, like a TSDF with many customers.
    - Select "Yes" or "No" to bringing GM data forward from a previous report.
      - ❖ Most users select Yes, to bring forward the most recent report data.
      - ❖ Bringing forward data is one of the best features of the BR App as many generators have fairly consistent waste streams over time.
        - All GM information will be copied forward, except for the amounts. The user only needs to:
          - data enter the amounts in the GM Forms,
          - delete GM Forms for any waste streams not generated, and
          - add GM Forms for any new waste streams.
    - RCRAInfo has built-in the ability to "save and finish later".
    - If you submit a BR and need to make edits, call DEEP to unlock the BR
    - For more information about the BR App, the E-Manifest App and the myRCRAid App, see the DEEP fact sheet **Using EPA's Industry Applications in RCRAInfo**

  - **GM Forms**
    - GM Forms are for reporting on-site hazardous waste generation and management, and off-site shipment during the reporting year.
    - Check to ensure the units of measure are used consistently on each form.
    - Use Management Method Codes from Box 19 of the manifest. Do not use the "Final Management Method Codes" which some TSDFs provide.
    - Delete GM Forms for exported shipments (i.e., shipments made <u>directly</u> to facilities located outside the USA, such as Stablex).
    - For more information, see EPA guidance: **Biennial Report Instructions and Forms** and **BR Reportable and Non-Reportable Wastes**.

- "Flat Files" – Most sites do NOT choose to use data files or "flat files" to upload their BR data. Most choose manual "data entry" using the GM Forms in the BR Industry App. Those with numerous waste streams and numerous sites to report (e.g. TSDFs), may want to use flat files for uploading. Instructions and file specifications are provided:
  - ❖ In RCRAInfo, under the Documentation tab, click on General Help.
  - ❖ Then on the left, click on Application Help > User's Guide > Biennial Report > Load Utility > Biennial Report Load.
  - ❖ Flat file specifications are also on the **RCRAInfo Web webpage**.

- **WR Forms**
  - WR Forms are for waste received. Only a few sites in CT receive waste from other sites (TSDFs), so most BRs do not include WR Forms.
  - For those uploading flat files, data for WR Forms may also be uploaded.

- **OI Forms**
  - OI Forms are optional for states, and CT does not require them. RCRAInfo automatically calculates data in the OI forms, but Connecticut generators may disregard the data created.

- **Site Identification Form**
  - For Box 10.A.1, report the generator status as it is when you submit the BR. Do not report the status as it was during the preceding reporting year.
  - Do not check "Yes" in Box 17 for "Electronic Manifest Broker" unless you truly are a broker. Very few users are brokers.
  - Note: the Site ID portion of the BR is entered into RCRAInfo immediately after it is accepted by DEEP. The remainder of the BR is not entered into RCRAInfo until the following November when the National Report is prepared.
  - The Site ID form in the BR App is consistent with the regulations that CT has adopted. The forms do not require information for regulations CT has not yet adopted.
    - Some examples of requirements you will not see for CT in the BR App:
      - The **Pharmaceutical Rule** and the PHRM waste code;
      - The provisions of the **Generator Improvements Rule**, including Episodic Generation, VSQG to LQG Consolidation, and SQG Re-Notification requirements; and,
      - Requirements for **Hazardous Secondary Materials**.

- **Detailed Guidance**

  - o **Biennial Report Instructions and Forms** (EPA Form 8700-13 A/B)
    - ▪ The most complete set of instructions available.
    - ▪ Use the instructions only – not the forms.

  - o RCRAInfo Documentation
    - ▪ Built into RCRAInfo Industry Apps.
    - ▪ After signing-in, go to the "Documentation" tab, then click "Help."

    - ▪ Then on the left, User's Guide > Site Dashboard > Biennial Report.

  - o **BR Reportable and Non-Reportable Wastes**. (EPA Guidance Document).
    All regulated hazardous wastes must be included in the report. This applies also to any waste streams treated on site as well as to the wastes manifested off-site. Exceptions include but are not limited to used oil, universal wastes and wastes exported directly to a foreign country.

What Happens After I Submit My BR?
- March 1ˢᵗ: DEEP receives about 350 reports (~80% of total),
- March – April: DEEP tries to contact late submitters.
- April – June: DEEP does preliminary data review.
    - About 30 – 40 sites will get a call or email from DEEP with questions.
    - DEEP's goal is good data collection, not enforcement for errors.
    - DEEP can unlock the report for you if corrections are needed.
    - You will be notified by RCRAInfo when DEEP accepts the corrected report.
- July – August: EPA runs more data quality checks.
- September – October: DEEP final review.
    - About 5 – 10 sites will get a call or email from DEEP with questions.
- November: EPA closes and locks all reports to users and DEEP.
- December: EPA publishes the final national report.

What do DEEP and EPA do with the reports?
- DEEP uses the reports to understand site activity, guide the selection of inspection candidates, develop industry sector initiatives and outreach efforts, etc.
- EPA compiles the data from the sites in all States to prepare a higher level, national report about trends in HW management and capacity assurance.

Glossary of Some Terms Used in this Guide

- **Handler** - Any entity that generates, stores, treats or disposes of any waste defined by the Connecticut Hazardous Waste Management Regulations as a **hazardous waste**. Handlers are further defined as one of the following:

    - **TSDF** - Treatment, Storage and Disposal Facility – a facility specially permitted to receive, treat, store or dispose of **hazardous wastes**, OR any historic land disposal facility that has not yet been fully "clean closed."

    - **LQG** - Large Quantity Generator - a facility that generates more than 1,000 kilograms (kg) of **hazardous wastes** in any calendar month, **or** accumulates more than 1,000 kg of hazardous waste, **or** generates or accumulates more than 1 kg of **acute hazardous waste** in a calendar month.

    - **SQG** - Small Quantity Generator - a facility that generates more than 100 kg but never more than 1,000 kg of **hazardous wastes** in any calendar month, **and** does not accumulate more than 1,000 kg of hazardous waste **and** does not generate or accumulate more than 1 kg of **acute hazardous waste** in any calendar month

- o **CESQG** - Conditionally Exempt Small Quantity Generator - a facility that does not generate more than 100 kg of **hazardous waste** in any calendar month **and** does not accumulate more than 1,000 kg of hazardous waste **and** does not generate or accumulate more than 1 kg of **acute hazardous waste** in any calendar month. This category of generator is referred to by EPA as a "Very Small Quantity Generator" or "VSQG".

- **Hazardous waste** - Any waste that is defined as hazardous by the **Code of Federal Regulations, Title 40, part 261 (40 CFR 261), subparts C and D**, as those regulations are incorporated by reference and modified by **Section 22a-449(c)-101 of the Regulations of Connecticut State Agencies (RCSA)**. These regulations describe the various hazardous wastes and their associated codes.

Questions?

If you have questions, please call or email the DEEP Hazardous Waste Compliance Helpline at:
- 888-424-4193, or
- **DEEP.RCRAHelp@ct.gov**

Content Last Updated January 6, 2026