



## *RCRA Biennial Reporting 2025*

### **Regulatory Requirements, Key Dates, and Submission Best Practices**

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# RCRA Biennial Reporting / What is it?



- US EPA Resource Conservation and Recovery Act (RCRA) [262.41]
- Michigan EGLE Part 111, Hazardous Waste Management Rules.
- Frequency: Every two years (biennial).
- Due Date: March 1 of every even-numbered year
- What is reported:
  - Types and quantities of hazardous waste generated.
  - How the waste was managed (e.g., treated, recycled, disposed).
  - Episodic Events
  - Hazardous Secondary Materials (HSM) activities



# RCRA Biennial Reporting / Key Dates



- **January 2, 2025** –  
Industry users can begin creating submissions
- **January 2, 2026** –  
Regional/State regulators can begin accepting/processing submissions
- **March 1, 2026** –  
Deadline for industry users to submit report
- **October 28, 2026** –  
Deadline for states to declare data final





## Hazardous Waste Large Quantity Generators (LQGs) [262.41]

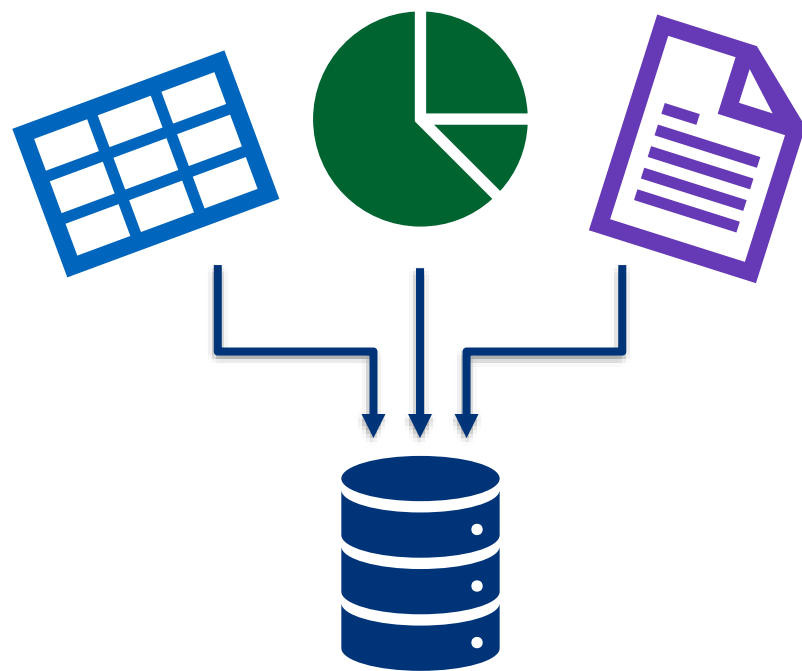
- Generated and shipped waste offsite [262.41(a)]
- Generated and treated, stored, or disposed waste on site [262.41(b)]

## Hazardous Waste Treatment Storage Disposal Facilities (TSDFs)

- Received waste from off-site generators. [264.75]
- Generated and shipped waste offsite. [262.41(a)]
- Generated and treated, stored or disposed waste on site. [262.41(a)]



# RCRA Biennial Reporting / Before Starting...Data Collection



**DATA COLLECTION**

- Last Site Identification Form (8700-12) submitted
  - Include facility EPA ID, name, and address
- Last Biennial Report submittal for reference
  - Useful for waste groupings, Waste Codes, Form Codes, Source Codes, Management Codes, etc.
- Previous odd numbered year's manifests &/or waste types & quantities
- Waste Summaries
  - From receiving TSDF Portals
  - For treated / received waste
- Off-site shipment details (destination TSDFs)



[Overview](#)[My Sites](#)[Outstanding Site ID Requests 0](#)

## Outstanding Actions

myRCRAid 0

Biennial Report 0

Annual Report 0

e-Manifest 0

WIETS 0

## myRCRAid

Show 10 ▾ entries

Site ID ▾	Site Name ▴	Updated ▾	Action Item ⓘ ▴
No Outstanding Actions			

Showing 0 to 0 of 0 entries

[Previous](#)[Next](#)



# RCRA Biennial Reporting / Steps to Complete?



Verify Generator Status for Previous Odd Numbered Reporting Year

Complete Biennial Using RCRA Info (or can be done manually)

Site ID Form –RCRA Subtitle C Site Identification Form

GM Form –Waste Generation & Mgt Import data from RY2025 Biennial

- Export data with hazardous waste shipment
- Obtain Form Code / Source Code
- Convert Units
- Consolidate
- QA/QC

WR Form –Waste Received from Off-Site

OI Form –Off-Site Identification

Additional State Site ID Form



# Biennial Reporting



**Don't Forget...Check  
your state for  
additional  
requirements**



**GM Form –Waste  
Generation & Mgt  
Import data from  
RY2025 Biennial**

Minimization Codes

Incorrect Manifests

Sources for Form & Source  
Codes vs. Manual

Waste grouping

Unit of Measure (UOM)



**WR Form –Waste  
Received from Off-Site**

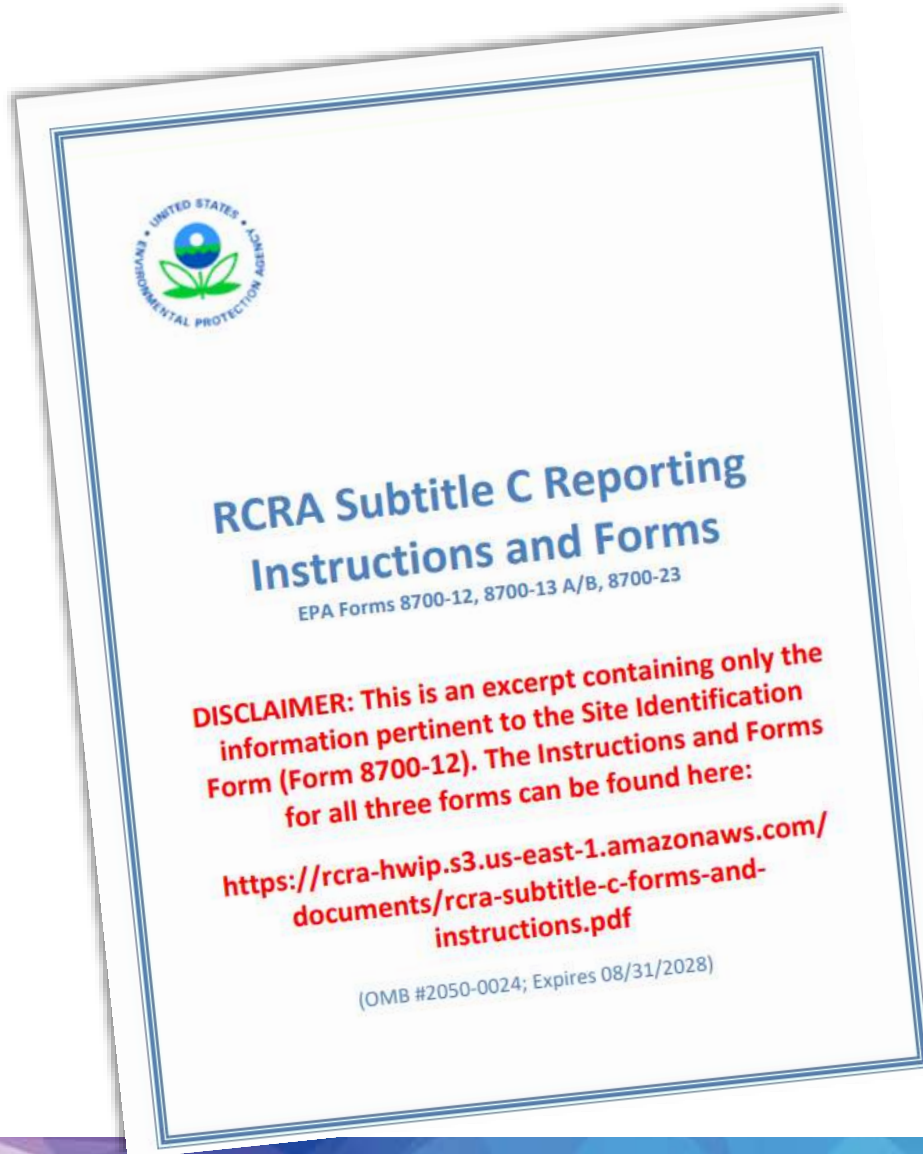


**OI Form –  
Off-Site Identification**

Country

Look up by EPA ID Number





- Site ID Form –RCRA Subtitle C Site Identification Form
  - Latitude / Longitude
  - Mailing Address
  - Primary NAICS
  - Legal Owner name, address & Start Date
  - List of Federal waste codes used
  - List of State waste codes used
  - Additional Regulated Waste Activities – Universal Waste, Used Oil, LQG Consolidation of VSQG waste, HSM, Episodic Events



# RCRA Biennial Reporting / How to Submit?



**EGLE**  
MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
Materials Management Division

**Site Identification Form**  
Required under authority of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties.

You must save this file to your computer before completing the form.

1. Reason for Submittal (Check only one)

Check Box	Reason for Submittal
<input type="checkbox"/>	Obtaining an initial Site Identification (Site ID), number, as a new site or new owner, for an on-going regulated activity that will continue for a period of time. Fees do not apply to liquid industrial by-product (LIB), only sites. <ul style="list-style-type: none"><li>Pay the \$50 fee on-line using MasterCard, VISA, or Discover Card at <a href="https://www.thepayplace.com/mi/deg/siteid">https://www.thepayplace.com/mi/deg/siteid</a>.</li><li>Enter Payment Verification Code: Site!5150.</li><li>Email the form with a copy of the fee receipt to <a href="mailto:EGLE-MMD-Site-ID-Reporting@Michigan.gov">EGLE-MMD-Site-ID-Reporting@Michigan.gov</a>, or mail the form with check payable to the State of Michigan to Michigan Department of Environment, Great Lakes and Energy (EGLE), Cashier's Office-HWUC, P.O. Box 30657, Lansing, Michigan 48909-7741.</li></ul>
<input type="checkbox"/>	Submitting a subsequent notification to change, update, or verify site information for a current owner or operator of a site with a previously issued Site ID number. Email to <a href="mailto:EGLE-MMD-Site-ID-Reporting@Michigan.gov">EGLE-MMD-Site-ID-Reporting@Michigan.gov</a> .
<input type="checkbox"/>	*Notification that site is no longer generating hazardous waste-End Date Required: <input type="checkbox"/> Site is out of business-End Date Required: <input type="checkbox"/> Site is still in business. Date: <input type="text"/> Authorized Signature: <input type="text"/> *Email completed pages 1-3 to <a href="mailto:EGLE-MMD-Site-ID-Reporting@Michigan.gov">EGLE-MMD-Site-ID-Reporting@Michigan.gov</a> .
<input type="checkbox"/>	*Addendum page(s) submittal (Check all that apply): <ul style="list-style-type: none"><li><input type="checkbox"/> Hazardous Secondary Material (HSM) Activity (See page 11).</li><li><input type="checkbox"/> Episodic Event Generator (See page 12).</li><li><input type="checkbox"/> LQG Consolidation of VSQG Hazardous Waste (See page 14).</li></ul> *Email completed pages, as applicable to <a href="mailto:EGLE-MMD-Site-ID-Reporting@Michigan.gov">EGLE-MMD-Site-ID-Reporting@Michigan.gov</a> .
<input type="checkbox"/>	Obtaining or updating a Site ID number for conducting electronic manifest broker activities.
<input type="checkbox"/>	Submitting a new or revised Part A Form.
<input type="checkbox"/>	Submitting as component of the Hazardous Waste Biennial Report for Reporting Year: <input type="text"/>
<input type="checkbox"/>	Former TSD facility, reverse distributor, and/or generator of less than 1,000 kilograms (kg) hazardous waste, less than 1 kg acute hazardous waste, or 100 kg acute hazardous waste spill cleanup in one or more months of the reporting year.

2. Site ID Number  
Site ID Number:

Michigan.gov/EGLE Page 1 of 14 EQP5150 (Rev. 08/2025)

- Submit data via RCRAInfo
  - State can review it there.
- Site ID Form – Michigan EGLE Site Identification Form (EQP5150) - must be completed electronically and emailed.
  - Check the Hazardous Waste Biennial Report box on the page
  - Enter the reporting year
  - Complete Pages 1-9
  - Email the completed EQP5150 to [BiennialReport@Michigan.gov](mailto:BiennialReport@Michigan.gov)



<input type="checkbox"/>	<p>*Addendum page(s) submittal (<i>Check all that apply</i>):</p> <p><input type="checkbox"/> Hazardous Secondary Material (HSM) Activity (<i>See page 11</i>).</p> <p><input type="checkbox"/> Episodic Event Generator (<i>See page 12</i>).</p> <p><input type="checkbox"/> LQG Consolidation of VSQG Hazardous Waste (<i>See page 14</i>).</p> <p>*Email completed pages, as applicable to <a href="mailto:EGLE-MMD-Site-ID-Reporting@Michigan.gov">EGLE-MMD-Site-ID-Reporting@Michigan.gov</a>.</p>
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## 2. Site ID Number

Site ID Number:



# RCRA Biennial Reporting / Resources



Task	Date
Industry users can begin creating their submissions.	January 8, 2025
WSPN48 - Regional RC Coordinator Kickoff (Regional Only)	October 14, 2025
WSPN48 - 2025 RC Kickoff Meeting - Cycle Changes, Checklists, Outreach, Regional/State Rules, State Systems (National Call)	October 16, 2025
Regional/State regulators can begin accepting/processing submissions.	January 2, 2026
WSPN48 - Submissions Received, Processing, DQ Reports/SR, RC User Status (National Call)	January 15, 2026
DEADLINE for industry users to submit their Biennial Report.	March 1, 2026
WSPN48 - Processing, DQ Reports, SR Reports (National Call)	March 18, 2026



## • Resources

- TSDFs
- Consultants
- EPA website – [RCRAinfo 2025 Biennial Report Cycle Webpage](https://www.epa.gov/rcra/rcrainfo-2025-biennial-report-cycle-webpage)
- State agency – [EGLE Hazardous Waste Biennial Reporting Webpage](https://www.michigan.gov/egle/hazardous-waste-biennial-reporting-webpage)

**Connie Darnell**  
**EGLE, Materials Management Division**  
**517-614-0784**  
**DarnellC2@Michigan.gov**



# Generator Status Tracking & User Fees



## Part 111, Rule 299.9303

- Requires generators determine category or status on a continual basis.

## Hazardous waste generator category is based on:

- Total weight of the hazardous waste generated each calendar month at the site
- Weight of hazardous waste accumulated at the site at any one time.

## Initial EQP5150 notification & site ID number issuance

- \$50 user charge.

## Facilities subject to annual handler & manifest user fees

- Based on the largest hazardous waste generator category during the previous calendar year. **(Due 4/30 Annually)**
  - Hazardous Waste Generation (SQG \$100, LQG \$400, VLQG \$1,000)
  - Used Oil processors, re-refiners, burners, and used oil fuel marketers (\$100)
  - Licensed TSDF (\$2,000)

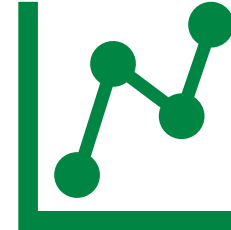


# How is this data used?



## RCRA Biennial Reporting Data Supports:

National and state trend analysis.  
Policy development and regulatory oversight.



## User Charge Data Cleanup Supports:

Regulatory impact analyses  
Freedom of Information Act Requests  
Hazardous waste generation trend analyses  
Hazardous waste import & export trend analyses  
Hazardous waste program permitting, closure, corrective action, & compliance inspection planning



# Episodic Event Notification (SQG & VSQG)

## Planned / Unplanned Episodic Events



Maintain existing generator status by complying with the following: (Part 111 R 299.9316)

Allowed 1 planned or unplanned episodic event annually & cannot generate more than 13,200 pounds (6,000 kilograms.) of nonacute hazardous waste during an event.

May petition for a second event. Second episodic event cannot be the same as the first episodic event (if the first event in the calendar year was planned, the second must be unplanned and vice versa).

EQP5150 Notification submitted 30 days prior to planned episodic event.

EQP5150 Notification submitted within 72 hours of unplanned episodic event.



# Hazardous Secondary Material (HSM) Annual Reauthorization Form – Due 4/30



- Part 111, Rule 299.9204 (1) (aa, bb, cc, or dd) requires annual re-notification for HSM.
  - Material determined to be a HSM excludes the material from the definition of waste.
- Submittal of this form required to maintain generator's HSM exemption status.
  - The form certifies compliance with the hazardous waste exclusion in the generator's original notification.
- The generator & subsequent handlers may have other regulatory responsibilities, see HSM Guidance:

Contact:

**Jarrett Hale**

Waste Characterization Specialist,  
Permitting & Program Support Unit  
Hazardous Waste Section,  
Materials Management Division  
[HaleJ5@Michigan.gov](mailto:HaleJ5@Michigan.gov).

<https://www.michigan.gov/-/media/Project/Websites/egle/Documents/Programs/MMD/Hazardous-Waste/Hazardous-Secondary-Waste-Guidance.pdf>

**Please do not use this form for initial HSM exclusion requests.**



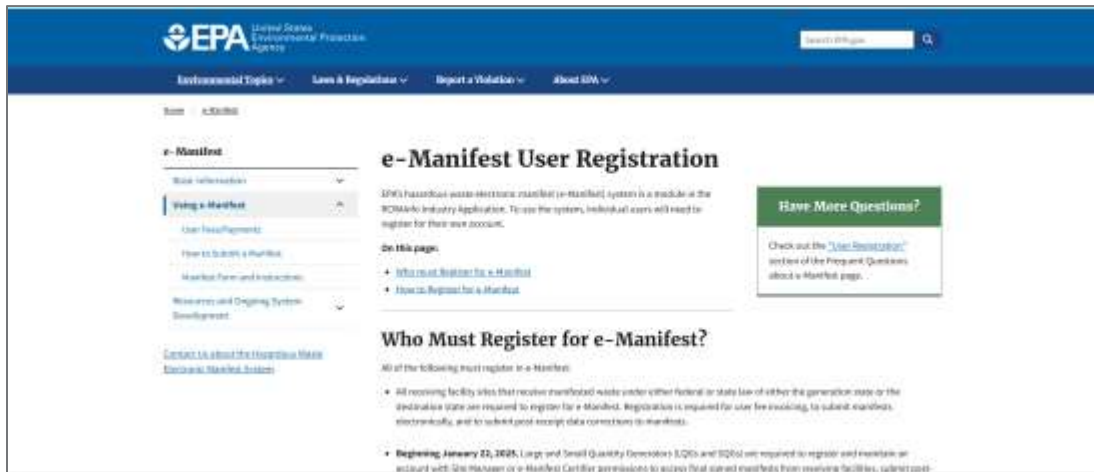
# Small Quantity Generator (SQG) / Notification Reminder



- **Did you miss the September 1, 2025 deadline?**
- EGLE requires SQGs to renotify hazardous waste activity every 4 years.
  - The first renotification was due in 2021.
- Renotification
  - Improves Michigan's SQG tracking
  - Allows more targeted outreach & compliance assistance to facilities that generate more hazardous waste.
- To meet the renotification requirement,
  - SQGs must complete & submit the [Michigan Site Identification](#) (EQP 5150) form.
  - Submit completed forms (signed & scanned) [EGLE-MMD-Site-ID-Reporting@Michigan.gov](mailto:EGLE-MMD-Site-ID-Reporting@Michigan.gov).



# RCRAInfo LQG & SQG / New Registration Requirement 2025



- US EPA promulgated the [e-Manifest Third Rule](#)
  - Required SQGs & LQGs to register & maintain an account in [RCRAInfo](#) by January 22, 2025.
- Register to meet this new requirement:
  - Visit US EPA's [e-Manifest User Registration Webpage](#)
- For questions on the U.S. EPA's RCRAInfo registration:
  - Contact
    1. e-Manifest Help Desk / 833-501-6826
    2. [helpdesk@epacdx.net](mailto:helpdesk@epacdx.net)
    3. [local hazardous waste program staff](#)
    4. Email [EGLE-MMD-Site-ID-Reporting@Michigan.gov](mailto:EGLE-MMD-Site-ID-Reporting@Michigan.gov)



# Questions?



## Kevin W. Bott

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**Michigan Department of Environment,  
Great Lakes, and Energy**

[Michigan.gov/EGLE](http://Michigan.gov/EGLE)

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