

KEY POINTS for Filing the 2025 Report of Hazardous Waste Activity (“Biennial Report”)

GENERAL

- The report is due by **March 1, 2026**.
- Refer to the notification letter for Maryland-specific instructions that replace or supplement portions of the printed instruction book.
- The report should only include information on hazardous waste management for calendar year 2025.
- **Maryland regulations require** you to file the report if **any** of the following apply (regardless of your generator status):
 - You generated 100 kilograms (220 pounds) or more of hazardous waste in any month in 2025.
 - You generated more than 1 kilogram (2.2 pounds) of **acute** hazardous waste in any month in 2025. (Acute hazardous wastes are identified in Code of Maryland Regulations (COMAR) 26.13.02.05C(1), C(2) and C(6)).
<http://www.dsd.state.md.us/comar/comarhtml/26/26.13.02.05.htm>
 - You had on site at any time in 2025 more than 100 kilograms (220 pounds) of hazardous waste (**accumulation**).
 - You had on site at any time in 2025 more than 1 kilogram (2.2 pounds) of **acute** hazardous waste (**accumulation**).
- Include in the report information on Maryland-specific hazardous wastes in addition to federally-regulated hazardous wastes. Other than polychlorinated biphenyl (PCB) wastes, these Maryland-specific wastes are not widely generated. For a complete list of these wastes, see
<http://mde.maryland.gov/programs/LAND/HazardousWaste/Pages/biennialreport.aspx>
- Must complete a Waste Generation and Management (GM) Form and/or Waste Received from Off-Site (WR) Form for each type of waste stream generated or received. You cannot combine different waste streams on one GM or WR form.
- MDE encourages generators to submit their 2025 BR electronically.

- As of January 22, 2025, EPA's e-Manifest Third Rule now requires all LQGs and SQGs to register in RCRAInfo. In order to utilize the electronic filing, the facility must have at least one Site Manager register. A site manager must be someone in management, for example, an Owner or Director. The site manager will be allowed to certify the biennial report. Employees of the site can register as a preparer. Once the site manager has been approved, any requests from the employees will be sent to the site manager for approval. To register as a site manager, please refer to the letter below titled "RCRAInfo Industry Applications". There are links to the database as well as links to EPA's website with instructions and information. Once you have registered to be a user in RCRAInfo, there is online training available for different applications, such as, "How to complete a biennial report". The training is available on a separate site called "Learning Zen". You will have to register to access the training. Your RCRAInfo log in will not work. To gain access to the training, log into RCRAInfo, and under the tab "Documentation" there is a link to Online Training.
- If you choose or must complete the report via hard copy, the entire report with an original signature (wet signature) should be mailed to:
Maryland Department of the Environment
Land and Materials Administration
Solid Waste Program
1800 Washington Boulevard, Suite 650
Baltimore, MD 21230-1719
- If you have any questions or need assistance, you may contact Lynn Jagdeo at 410-537-3475 or by email at lynn.jagdeo@maryland.gov; Wesley Macek at 410-537-3861 or email at wesley.macek@maryland.gov; or Section Head, Jennifer Hopper at 410-537-3350 or by email at jennifer.hopper@maryland.gov.
- Or visit the Department's website for additional information including Frequently Asked Questions:
<http://mde.maryland.gov/programs/LAND/HazardousWaste/Pages/biennialreport.aspx>

WASTE MINIMIZATION/POLLUTION PREVENTION – Reporting Requirements

Code of Maryland Regulations (COMAR) 26.13.03.06B(1)(d)(vi) requires that the biennial report includes a description of efforts undertaken during the reporting year to reduce the volume and toxicity of waste generated. This requirement is satisfied by entering the appropriate waste minimization code from the report instructions in Item G of the Waste Generation and Management Form (GM Form).

SITE IDENTIFICATION FORM – Sections not applicable in Maryland

- Question 12, “Eligible Academic Entities with Laboratories”, is not applicable, since Maryland has not adopted Subpart K of Part 262, Title 40 of the Code of Federal Regulations (40 CFR Part 262, Subpart K).
- Question 16, “Notification of Hazardous Secondary Material (HSM) Activity”. The “No” box should be checked, and “Addendum to the Site Identification Form: Notification of Hazardous Secondary Material Activity” should **not** be completed. Maryland has not adopted the regulations cited in Question 16.
- Question 17, “Electronic Manifest Broker”. The “No” box should be checked. This is for eManifest only. This does not apply to the biennial hazardous report.

SITE IDENTIFICATION FORM – How to complete these sections

- Question 13, “Episodic Generation”. The “No” box should be checked, and “Addendum to the Site Identification Form: Episodic Generator” should **not** be completed. This section cannot be used to apply for approval of an episodic event in combination of completing the biennial report. If you want to apply for an episodic event, please submit a separate request with addendum. If you had an approved episodic event in 2025 you still are not to complete this section.
- Question 14, “LQG Consolidation of VSQG Hazardous Waste”. The “No” box should be checked, and “Addendum to the Site Identification Form: LQG Consolidation of VSQG Hazardous Waste” should **not** be completed if you have not pre-notified MDE and was not approved. If this is the first time you are notifying MDE please complete a separate request with addendum.
- Question 15, “Notification of LQG Site Closure”. Complete this section if the entire facility or just the accumulated site area is closed.