

RY2025 Annual Report FAQ

1. Is there a link available to download the workbook?

The Division of Solid Waste Management (DSWM) prepared instructions for completing the Annual Hazardous Waste Report, which may be accessed at the following link:

<https://www.tn.gov/environment/program-areas/solid-waste/hw/waas/ar.html>

2. Can a facility still electronically submit the annual report if there is no Biennial Report tab available to prepare my report?

Yes, facilities can still submit a report; however, the person completing and signing the report will need to modify their account permissions to either preparer or certifier for the Biennial Report module. If the person has the site manager role, this tab should already be available to create a report submission.

3. If an employee is new to the company, do should they use an existing facility account to log into RCRAInfo or register for a new account?

Each employee that needs access to RCRAInfo should register an account with their individual employee email address; shared accounts, or generic email accounts (e.g. EHS@companyname.com) are not allowed to have site access in RCRAInfo. If you already have a CDX account, you can log in to RCRAInfo using that account's sign in credentials.

4. Will there be a link available to download this presentation?

The presentation will be available for viewing on our website after February 13, 2026.

The presentation will remain available for the remainder of the year.

5. How can an employee get access to a site if the currently listed site manager is no longer with the company?

Submit your site permission request in RCRAInfo as usual and then email the state administrator at Waste.Activity@tn.gov afterward. In the email state that you have requested access to your site, however the site manager is no longer with the company. Include your account name, facility name, and EPA ID number in this email.

6. If a facility already has an employee registered for e-manifest (as required by the e-Manifest 3rd Rule), does that employee have access to RCRAInfo?

Yes, companies that registered one facility contact for e-manifest in RCRAInfo under the 3rd Rule requirements have access to the other parts of RCRAInfo to submit notifications. This access was updated for site managers when Tennessee opted into the myRCRAid, Annual Report, and Biennial Report modules in January 2026. If the contact is not a site manager, they should modify their permissions for a site by requesting viewer, preparer, or certifier permission for those 3 modules.

7. How do I modify my site permissions if I need a different permission level? For example, if I have previously registered and been approved as a Preparer, how do I adjust my permissions to become a Certifier or Site Manager?

Open your RCRAInfo account, go to your profile and select the “My Sites” tab. Select the site that you need to change permissions for (there should be a little tick box to the left of that entry) and at the bottom of the screen there is a “Modify Permissions for Select Sites” button. Select that button, and it will open a window that lets you request additional permission.

8. If facilities are submitting the “biannual” report for RY2025, does last year’s data need to be included, even though it’s a “biannual”?

No, facilities are only submitting data for the report year requested, even though it will be submitted through the biennial report module in RCRAInfo for odd-numbered report years.

9. Should the amount of waste entered into item 1.H “Quantity Generated” be only the amount of waste for the 2025 Calendar Year? Or should it be for two full years since this is a Biennial Report?

The amount of waste submitted on the RY2025 hazardous waste report in item 1.H should reflect only the amount of waste generated during calendar year 2025. The term “biennial” refers only to EPA’s reporting frequency, not the number of years covered under the report.

10. Does a Very Small Quantity Generator (VSQG) required to file due to an episodic event submit a biennial report or an annual report?

TN is more stringent than EPA and requires facilities that meet certain criteria (including episodic VSQGs) to submit hazardous reports annually. RCRAInfo has two modules to submit these reports – the Biennial Report module is used to submit the annual report in odd-numbered report years, and the Annual Report module is used to submit the annual report in even-numbered report years. Both modules have the same informational requirements.

11. Should all facilities have the previous year's data if the facility submitted a scanned copy email of the report?

Due to technological constraints, the most recent available information for a site in RCRAInfo will likely be for RY2023, not RY2024 regardless of submission method.

12. What should a facility do if some of their waste streams were not included in the waste stream information brought forward from RY2023?

If a facility has active waste streams that were not included as part of their initial submission creation, the facility should add them as new GM forms with all of the previously notified information. The waste description in item 1.A should include the waste stream number issued to the facility.

13. If a waste stream is classified as active, but has not been generated in a few years, should the facility still submit a GM form for this waste stream?

A facility should submit a GM for all active waste streams, even if no waste is generated during the report year. The waste description information should remain the same, the amount generated should be set to 0, and a comment should be input into item 4 stating that although no generation occurred during the report year, the facility would like to keep the waste stream active for future generations.

14. Will facilities be able to rewatch this workshop recording?

Yes, the recording will be available for viewing on our website after February 13, 2026.

15. Is there a limit to the number of waste codes that can be entered into block 1.B on the GM Form?

No, there is no limit to the number of EPA waste codes that can be entered into item 1.B on the GM form.

16. Can the unit of measure listed on the GM form be kilograms?

Yes. Facilities should report their waste generation using either kilograms or pounds as their unit of measure.

17. Does the “quantity managed” in item 2 of the GM form equate to the amount of waste generated, shipped off, and rolled over from the previous year?

The “quantity managed” refers to the amount of waste treated onsite, whether that was generated during the current report year, or carried over from the previous year. The

amount of waste shipped offsite for treatment/disposal is recorded in the “quantity shipped” item in item 3 of the GM form.

18. Are facilities required to enter State TSD Codes (i.e., Box 4b on last year's form)?

Facilities are no longer required to use the State TSD codes to describe the waste treatment or disposal method on the GM form (if reporting using RCRAInfo) or the OSR form (if reporting using the paper forms). The only time a facility will need to use the state TSD codes is when providing justification for an offsite shipping fee exclusion or discount on the G-FDS form or the RF-FDS form.

19. Will this Comments field be pre-populated for past years reports?

No, the comments field for the current reporting year forms will not be pre-populated from previous years’ reports.

20. Is Item 1.G “Quantity” on the GM form in RCRAInfo the total amount of waste generated for the year?

Yes, item 1.G on the GM form represents the total amount of waste generated for that specific waste stream for the entire report year.

21. Is there a list of the current, valid Country Codes available?

Facilities can find the most current list of valid Country Codes on EPA’s website at <https://rcrainfo.epa.gov/rcrainfo-help/application/ded/NationallyDefinedValues/HandlerModule/NDV-HandlerCountry.htm>

22. How does a facility find the Management Method Codes for our waste transporters?A

list of all of the valid EPA management method codes can be found on EPA’s website at <https://rcrainfo.epa.gov/rcrainfo-help/application/ded/NationallyDefinedValues/BiennialReportModule/NDV-BiennialReportManagementMethod.htm>

The specific EPA management code for a given waste may also be found on line 19 of the facility’s manifest(s) or by contacting the Treatment, Storage, and Disposal Facility (TSDF).

23. If a facility only holds waste until pick up, does information still need to be entered for item 2, “Onsite Management” on the GM Form?

Small or large quantity generators that generate waste and accumulate the waste onsite prior to shipping it offsite for treatment do not need to record their accumulation activities in item 2 “Onsite Management” on the GM form. If the generator ships the waste offsite for treatment or disposal during the report year, it should be listed in item 3 “Offsite Shipping.”

24. Is it compulsory to provide Jan 1 and Dec 31 onsite amount for each waste stream?

Yes, facilities that have waste present onsite Jan 1 and Dec 31 of the report year must report that information in item 4, comments of the GM form.

25. Regarding hazardous waste reduction information in the comments section, should we include the following: "This Year Ratio, Goal Year Ratio, or Goal Year?"

The facility should provide an explanation of the hazardous waste reduction goals or lack thereof. That explanation can include the “This Year Ratio,” “Goal Year Ratio,” or “Goal Year” information but it is not required.

26. Should facilities submit a 0-generation waste stream even if the site is a VSQG?

VSQGs that have previously notified of that status and that have maintained it for the entire report year are not required to submit an annual report to the State of Tennessee. If a VSQG chooses to submit an annual report, it should submit a GM form for all active waste streams, even if there was no waste generation for a given waste stream during the report year.

27. Can facilities open or close a waste stream with an annual report submission?

Facilities can open or close waste streams with the annual report submission and should submit Form WSR to do so. This form should be included with the annual report submission of the fee sheet(s) G-FDS, RF-FDS, and/or TSD-FDS, along with the appropriate fee payment. The facility should also include a GM in the electronic RCRAInfo submission for that waste stream and indicate in item 4 “Comments” that this is either a newly generated waste stream (if the waste stream is newly opened) or that waste generation has ceased (if closing a waste stream). Generators are to notify of changes in generator data such as generating a new hazardous waste stream within 30 days of generation.

28. Should VSQG facilities submit an annual report if they want to keep their established waste streams? In other words, if a facility doesn't submit the hazardous waste report this year electronically will their waste streams be deleted?

No. If a VSQG facility skips years between reporting in RCRAInfo, its waste stream data is not deleted – the facility will be able to pull that old record forward when creating a new submission, even if it is several years old. However, the data may be old or out of date.

29. Can a facility create two GM forms for the same waste stream? One for lab pack with acute, and one for lab pack with no acute?

No, if it's the same waste stream, facilities should report everything in one GM form for that specific waste stream. If a facility wants to open a new waste stream for the acute waste labpack, then it should submit a 2nd GM form for it, but it would be considered a new waste stream, subject to the waste stream notification and fee requirements.

30. Will TDEC accept H141 as an EPA management method code listed as a treatment method in 3.C on the GM forms?

Yes, facilities can input this code if it accurately captures what occurred at that TSDf; however, you will still need to describe a method of final disposition in item 4 (Comments). If the final disposition method is known and the TSDf that received the waste stored it prior to sending it to another for treatment or disposal, facilities can use the new "S" codes instead of H141.

31. Are all waste minimization plans now due at the time of annual reporting rather than when they are currently due?

No, there is no change to when a facility's hazardous waste minimization plans are due. The Tennessee annual hazardous waste report only requires a summary description of the waste minimization efforts undertaken by the facility to be included with the report for small and large quantity generators.

32. If a facility changed its waste company in November (same waste streams, but utilizes a different transporter and offsite receiving facility), how should that information be reported on the annual hazardous waste report?

The facility should report all the TSDfs (both the old and the new ones) that received their waste in 2025 on the GM forms if using RCRAInfo to submit electronically. Both transporters should be listed on the OI form if they were both used during the report year.

33. Outside of the annual reporting process, can generators add/delete waste streams via RCRAInfo?

Not at this time; facilities will need to submit form WSR if closing or opening a waste stream as well as form G-FDS to pay the new waste stream fee. They will also need to submit the GM form during the relevant report year if closing a waste stream and add a

GM form for the waste stream during the relevant report year. Generators are to notify of changes in generator data such as generating a new hazardous waste stream within 30 days of generation.

34. How should multiple transporters be reported on the annual hazardous waste report?

RCRAInfo accepts OI form records for multiple transporters used by a facility during a report year. Each transporter that picked up at least one waste shipment during the report year should be recorded on the OI form.

35. If a generator uses an S code for treatment, should which TSDf should be reported with this EPA management method code – the facility that stored or bulked the waste, or the one that was responsible for final disposal?

If using the “S” EPA management method codes, report it with the TSDf that stored and/or bulked the waste, not the one responsible for the final disposal.

36. Will this be available to watch again as we need this information?

Yes, the recording of this training will be posted no later than February 13, 2026, on the DSWM website at

<https://www.tn.gov/environment/program-areas/solid-waste/hw/waas/ar.html>

37. Which form does a facility use to report the BTU information for energy recovery?The

BTU value is recorded in Part 6 of the G-FDS form under the offsite shipping fee justification column. That information, along with the appropriate state TSDR code(s) must be included to qualify for the fee discount.

38. What should a facility do if the site does not have any information uploaded from previous years that can be brought forward to create the RY2025 annual report submission?

If no information is uploaded for a site to be brought forward for the RY2025 report, the facility will need to enter the GM form data for all active waste streams in order to report for RY2025.

39. Since this is a biennial report year, does that mean a facility reports both their 2024 and 2025 waste generation, or is only the 2025 waste generation reported?

Facilities are only reporting waste for report year 2025 using the biennial report module in RCRAInfo. The term biennial is referring to the fact that EPA requires LQGs to submit a report every 2 years, although Tennessee has more stringent reporting requirements.

40. Should SQGs use the Annual or Biennial module in RCRAInfo to submit their annual report?

Facilities using RCRAInfo to submit the hazardous waste annual report, regardless of their generator status, should use the Biennial Report module during odd-numbered reporting years, and the Annual Report module during even-numbered reporting years.

41. Will my site be updated to 2023 as it currently only goes to 2015?

Unfortunately, previous years' annual reports will not be updated in RCRAInfo if that has not already taken place. Such facilities will need to enter their RY2025 GM and OI data themselves.

42. USEPA does not require the use of the "S" management method codes for the 2025 Biennial Hazardous Waste Reports. Does Tennessee require it, even though USEPA has not enforced it until EOY 2026?

Usage of the "S" management method codes is not required by Tennessee at this time, merely recommended. However, if a facility submits H141 as the EPA management method code for a TSDf on the GM form, they will need to explain the final disposition of the waste in item 4, "Comments". Using the "S" codes eliminates that requirement.

43. Is there still a fee for a new profile?

Yes, facilities will still need to pay the \$100 per waste stream fee for new waste stream notifications.

44. What are the WR forms?

The WR forms are submitted by TSDfS that receive waste from offsite generators. A generator does not need to complete that form as part of their annual report.

45. Do generators need to associate a transporter with a given waste stream or how much waste they transported for a generator?

No, facilities only need to list all the transporters that picked up waste at a site during the report year. This information is recorded on the OI Form.

46. Is there no need to add the amounts that the transporters take off site on the OI form?

No, that information is not required on the OI form at this time.

47. If a facility submits the annual report using RCRAInfo, which paper forms does that submission replace?

The RCRAInfo annual report submission replaces the old forms HN-CS, HN-EA, HN-H, HN-H(Contacts), WSR, and OSR for generators. Generators will still need to submit forms G-FDS and RF-FDS separately to pay their annual fees.

48. Do permitted facilities still need to compile a TPA - Treatment, Storage, Disposal And Recycling Permitted Activity form? Will that be covered today?

Permitted facilities no longer need to complete or submit form TPA (CN-0876) as part of their annual hazardous waste report.

49. Does this section include Hazardous Secondary Materials info?

The HSM generation information is reported in item 15 on the Site ID form if submitting via RCRAInfo.

50. Will there be an issue if the billing location of a company changed during the report year (*i.e.*, the billing location is now overseas instead of in the US)?

TDEC will not send invoices to an overseas address, so the facility will need to use a US address for at least one billing contact.

51. What does the state activity “CA – Corrective Action Site” refer to?

This is not a new term; it is just listed in a different place. Previously, corrective action sites reported that activity on form HN-EA under the TSD activity portion of the form. In RCRAInfo, facilities will report that information in item 11.E, “State Activities” on the site ID form in; on the paper form, this information is located in item 9.E on form HN-EA.

52. We are a TSD. Going forward, how would we separate waste shipped from a generation point not on the TSD footprint vs a waste shipped from the TSD? Section 4 vs Section 5 of the waste stream report?

That information no longer needs to be differentiated in the annual report. If a facility generated and shipped the waste, it is reported in item 3 “Offsite Shipping” on the GM form, whether it’s shipped offsite from permitted storage or another location at the TSD.

53. Are generators required to report amounts on site on Jan. 1 and Dec. 31? How can a facility edit 2024 data (e.g., waste reported and determined to be non-hazardous)?

Yes, facilities that have waste onsite Jan 1 and Dec 31 should report that information in item 4, Comments on the GM form. If the facility needs to amend RY2024 (or previous) information, that should be submitted to the DSWM using the old versions of the forms.

54. How long will it take for an account's permissions to update?

If the facility already has a site manager, the contact requesting permissions should reach out to their site manager if permissions are not granted in a timely manner. If the facility does not have a site manager, and the permissions request came directly to the DSWM/WAAS, that request should be approved or denied within 1 business day.

55. Can Preparers go back in after submittal to print off a copy of the completed report? or is that option only available to the Approver and Site Manager roles?

Yes, once a report has been submitted, those with access to the module can print a copy of the report submission.

56. How are forms TWR and TPA to be included in the electronic report?

Form TPA no longer needs to be submitted as part of the annual report for TSDFs. Form TWR is submitted electronically using the WR form in RCRAInfo.

57. Can a pre-submission draft of the entire report be generated and printed for review prior to certification and submission?

A facility can print a copy of the annual report submission by opening up the report dashboard and opening their notification. Once the report notification is open, the facility contact will be able to print all of the GM, WR, OI, and Site ID forms separately by selecting the printer icon in the top right-hand corner next to the form heading. The whole annual report can be printed as a single document after it has been signed and submitted.

58. Facilities can still submit the annual report using paper forms (old way) too? Or this using RCRAInfo mandatory?

Facilities can submit hard copy forms for the annual report submission, however, prior to submitting a paper copies they should review the annual report instructions posted on our website at

https://www.tn.gov/content/dam/tn/environment/solid-waste/documents/hazardous-waste/waas/sw_hw_instr-ar.pdf .

The paper form submission must be made on the revised forms; old versions will not be accepted.

59. Should a facility's RY2024 data be uploaded to RCRAInfo at this time?

The RY2024 data could not be mass-uploaded into the annual report module in RCRAInfo by the DSWM; only the RY2023 data was able to be uploaded. Facilities may need to add GM forms for waste streams added in RY2024.

60. Can you please show us how to download the summary report? Every year I struggle to get info to fill out this report.

There is no way to download a “summary report” of waste generated during the year from RCRAInfo. Facilities can download copies of their manifests from the e-Manifest module, and a copy of the completed report once it’s been submitted, but no summary of waste generated exists within RCRAInfo, beyond the hazardous waste report submittal.

61. Will annual used oil reporting requirements also be reviewed during today's session? Is it moving to web-based this year or does TDEC require a hard copy submittal?

The annual used oil reporting requirements were not discussed during the RY2025 annual hazardous waste report workshop. Questions regarding used oil reporting should be directed to Nina Vo at Nina.Vo@tn.gov.

62. What should a facility do if the RY2023 upload shows the wrong unit of measure for the waste generation, management, treatment and disposal amounts? For example, the RY2023 report has the waste amounts listed in kilograms where the facility has always reported in pounds previously.

Due to a programming error, all RY2023 reports were uploaded to RCRAInfo with their weights listed in kilograms, regardless of the unit of measure on the initial submission. Facilities that wish to make changes to their RY2023 data can request the state unlock the submission, reject it so that facilities can make edits, and resubmit the report with the correct units.

63. What should a facility do if their annual report data is showing under the biannual module instead of the annual module, and they are unable to add an entry under the annual report module for RY2025?

Facilities submit their hazardous waste reports using the biennial report module during odd-numbered report years (e.g. 2025, 2027, 2029) and submit using the annual report module during even-numbered report years (e.g. 2026, 2028, 2030). A facility will not be able to submit the RY2025 report using the annual report module.

64. How does a facility sign and certify the annual hazardous waste submission in RCRAInfo? Is that a wet signature or a check box?

Once a certifier or site manager completes the electronic signature agreement (either online or by mailing in a signed form), notifications and reports are considered signed by the certifier when they are submitted in the RCRAInfo. Forms G-FDS, TSD-FDS, and RF-FDS can be signed via encrypted electronic signature or wet signature.

65. What are the steps to submit the report as a Preparer so that a Site Manager can finalize and sign?

Accounts with the Preparer role should be able to complete the report forms and data validation; when the draft is ready for review and signature by the certifier, the preparer can mark it as “Ready for Signature.” Those with certifier and site manager permissions will receive a system email from RCRAInfo letting them know that the report is ready for signature. At that point, the person signing the report will be able to log into RCRAInfo and sign the prepared report and submit it so long as they have completed the Electronic Signature Agreement.

66. How does a facility determine the waste stream number to include in the waste description? Should the facility use the waste stream numbers from the previous year’s paper report from?

Facilities can determine their waste stream numbers by either using the numbers listed on a previous year’s annual report WSR forms or requesting a waste stream list from WAAS.

67. Does a facility need to complete and submit the G-FDS form if no fee is owed for the report year?

Yes, the facility should complete and submit the G-FDS form, even if no fee is owed to complete the report submission. The facility will indicate that no fee is owed by completing parts 1 and 4 of the G-FDS form.

68. Will the G-FDS form change from year-to-year, or will the current version be the new standard moving forward?

All state forms have the potential to change depending on new regulations that come into force; however, the G-FDS form is not anticipated to change much in the near future.

69. Where is the new G-FDS form located?

The new G-FDS form can be downloaded from the DSWM website at

<https://www.tn.gov/environment/program-areas/solid-waste/hw/waas/forms.html>

70. Does line 6 on the G-FDS form represent the total weight for all facilities?

The line 6 amount on Form G-FDS is the total amount of hazardous waste shipped offsite by the facility for the entire report year. Multiple facilities should not be calculating their annual generator fees on the same form; each facility should calculate its fees on a single form for each facility.

71. For Part 1 on the G-FDS form, should a facility count the wastewater generated and treated onsite towards its base fee calculation?

Facilities that generate and treat wastewater to a non-hazardous status prior to discharge or shipment offsite do not have to count that waste when calculating their annual generator base fee. Please refer to the form instructions under the “All Forms” subheading for more details located on the DSWM website at

https://www.tn.gov/content/dam/tn/environment/solid-waste/documents/hazardous-waste/waas/sw_hw_instr-gfds.pdf

72. Has the 30-day notification requirement of a new waste stream been absolved for a facility that needs to notify the state of new waste stream generation?

No, facilities are still required to submit new waste stream notifications within 30 days of the start of generation according to Rule 0400-12-01-.03(2)(d)1.(i)(IV). Facilities will need to submit forms WSR and G-FDS to make this notification.

73. Does a facility have to use a wet signature on the paper forms submitted or can DocuSign be used?

Any paper forms submitted can be signed with a valid encrypted electronic signature, including those generated by DocuSign.

74. If a generator has more than 5 waste streams that meet the exclusion or discount criteria on form G-FDs, how should the additional waste streams be reported? Facilities can submit a document with a table that contains the information requested on form G-FDS to account for all the waste streams that meet the exclusion and/or discount criteria.

75. Will NOV or NODs be issued this year if something is wrong on the hazardous waste reports?

Facilities will be notified via email if there are errors in the annual report and given 14 calendar days to resolve the errors and resubmit the report.

76. What should a facility do if their waste stream numbers were not imported as part of the waste descriptions on the GM forms from the RY2023 data?

Facilities will need to reference their waste stream numbers in the waste description in item 1.A. The page numbers for the GM forms in the RY2023 report data should match up to the facility's waste stream numbers issued by the state.

77. What are waste stream numbers?

Waste stream numbers are the numeric designators issued by the state to a facility for each waste stream identified and notified on by the facility.

78. What email/domain will error notifications be sent from RCRAInfo (so that we can flag spam/junk email filters appropriately)?

Emails regarding the status of notifications submitted in RCRAInfo will be sent from the email address rcrainfo.admin@epa.gov.

79. Is form G-FDS the only paper form required for generators, with everything else completed in RCRAInfo?

Generators should submit the G-FDS and RF-FDS forms using the paper forms downloaded from the DSWM website at <https://www.tn.gov/environment/program-areas/solid-waste/hw/waas/forms.html>. TSDFs will submit those two forms in addition to the TSD-FDS form. Facilities that are using the annual report to notify of new waste streams will also need to submit the WSR form along with the fee sheets.

80. If a facility has waste streams that should be closed, does the facility not submit a GM form for that waste stream? How should a facility submit the waste stream closure information?

Facilities should submit form WSR to close their waste streams during the calendar year; however, they will need to submit a GM form during that report year to notify the DSWM that all the waste has been shipped offsite for treatment/disposal or has been treated onsite.

81. Can a person be both the Site Manager and preparer in RCRAInfo, but then assign someone else as the certifier?

Yes, with caveats. A person with site manager permission can do all the steps to prepare a notification up to and include signing the notification. If the facility has a specific person for certifications, they will need to sign up for a RCRAInfo account and request certifier permission for the appropriate modules. The site manager, once they complete all of the form data entry, should not hit the "validate" option; they should notify the

person who will be signing the report to select “validate” and follow the system prompts to answer any validation errors that the report might have and electronically sign the notification.

82. If paying annual fees by check, when does it need to be received by?

The annual report fee sheets and payment should be postmarked by March 1st of each year.