

Official Business: Rhode Island Department of Environmental Management
235 Promenade St., Providence, RI 02908-5767 TDD 401-222-4462

Attn: «Contact_Name»
Site ID Number: «HandlerID»
Site Name: «Handler_Name»
Site Location: «LStreet1», «LCity»

January 5, 2010

Regarding: **2009 Hazardous Waste Report**

Dear Large Quantity Generator

This letter is to give you official notice that the 2009 Hazardous Waste Report Instructions and Forms along with appropriate software are currently available. Since 2005, there have been no changes to the reporting requirements and format.

Site information currently in our database is shown above for «Handler_Name». Please notify us if this information is incorrect.

A 2010 update of the Florida Software for preparing Biennial Reports (webbr2009) is available at the web site below. Instructions for installing and modifying the defaults for Rhode Island's needs are attached.

http://www.dep.state.fl.us/waste/categories/hazardous/pages/BRS_data.htm

For those wishing to file on paper, EPA has posted the forms and instructions at the following website

<http://www.epa.gov/osw/inforesources/data/br09/br2009rpt.pdf>

Another popular program (waste reporter) is available at the web site listed below:

<http://www.ess-home.com/products/waste-reporter/>

We are recommending the submission of BRS data on disk for generators that generate many different waste streams, due to its ability to pre-screen results. However, we will still accept data submitted on paper forms. If you use one of these packages, the data can be sent to us on a floppy disk or CD. However, you must print out and sign the Site ID Form.

In order to help you better understand what is required of you, I have included the attached sheet of frequently asked questions.

Additional Rhode Island Requirements

The reporting requirements in Rhode Island are very similar to the federal requirements. However Rhode Island requirements are different regarding the following issues:

Rhode Island Wastes: Although they are not counted in the calculation of Large Quantity Generator Status, all your hazardous waste streams should be reported including wastes that are hazardous by RIDEM regulations but are not hazardous according to federal regulations.

Form OI: Form OI is **not** required to be filled out.

Due date: The report is due on March 1, 2010. For those reporting electronically, a 30 day extension to these deadlines will automatically be granted. All others must request an extension in writing.

Waste Codes: Rhode Island requires waste codes on the Site Information (SI) form only when the SI is for an initial or subsequent Notification (i.e. Item 1 has first or second box checked) for hazardous waste handling (ie, Item 10.A has 'yes' in any box). Waste codes are required items for the GM forms.

I will also make myself available to meet with any of you individually regarding your biennial reports. If you have any further questions or concerning Biennial Reporting, please contact me at (401) 222-2797 ext. 7112 or by e-mail at mark.dennen@dem.ri.gov.

Sincerely,

Mark M. Dennen, Principal Environmental Scientist
Office of Waste Management

**FREQUENTLY ASKED QUESTIONS
ABOUT THE HAZARDOUS WASTE REPORTS (BRS)**

1. Am I required to fill out a BRS for this year?

Requirements are explained on page 13 of the booklet. One key requirement is that if you are a Large Quantity Generator (you generated more than 2,200 lbs. of Federally Regulated Hazardous Waste or more than 2.2 lbs. of RCRA acute hazardous waste in **any** given month of 2009) you must report. State-only wastes (waste with no applicable federal codes) are not counted in this calculation.

2. I was not a Large Quantity Generator in 2009 at all. Do I need to fill this out?

If you never met the definition of a Large Quantity Generator in any month in 2009, then you only need to complete the enclosed change of status form and return it to the Department.

3. Are small quantity generators required to fill out a Biennial Report?

Current regulations allow RIDEM to require a Hazardous Waste Report be filled out. However, RIDEM does not require SQG's to fill out reports on a routine basis. If RIDEM wants information for a particular company, they will give that company notice in writing to require them to fill out a Hazardous Waste Report.

4. I was a Large Quantity Generator for part of 2009 but am not now. What should I do?

If you were a Large Quantity Generator in 2009 but are no longer, fill out the complete report but on the Site ID form for site status indicate non generator or small quantity generator in accordance with your **current** status. The Department is not requiring reporting for Small Quantity Generators for 2009.

5. Should I report State-only wastes?

Yes. Although they are not counted in the calculation of Large Quantity Generator Status, all your hazardous waste (Rhode Island Waste and RCRA Hazardous Wastes) streams should be reported.

6. Should I report the wastewater that goes to my treatment system?

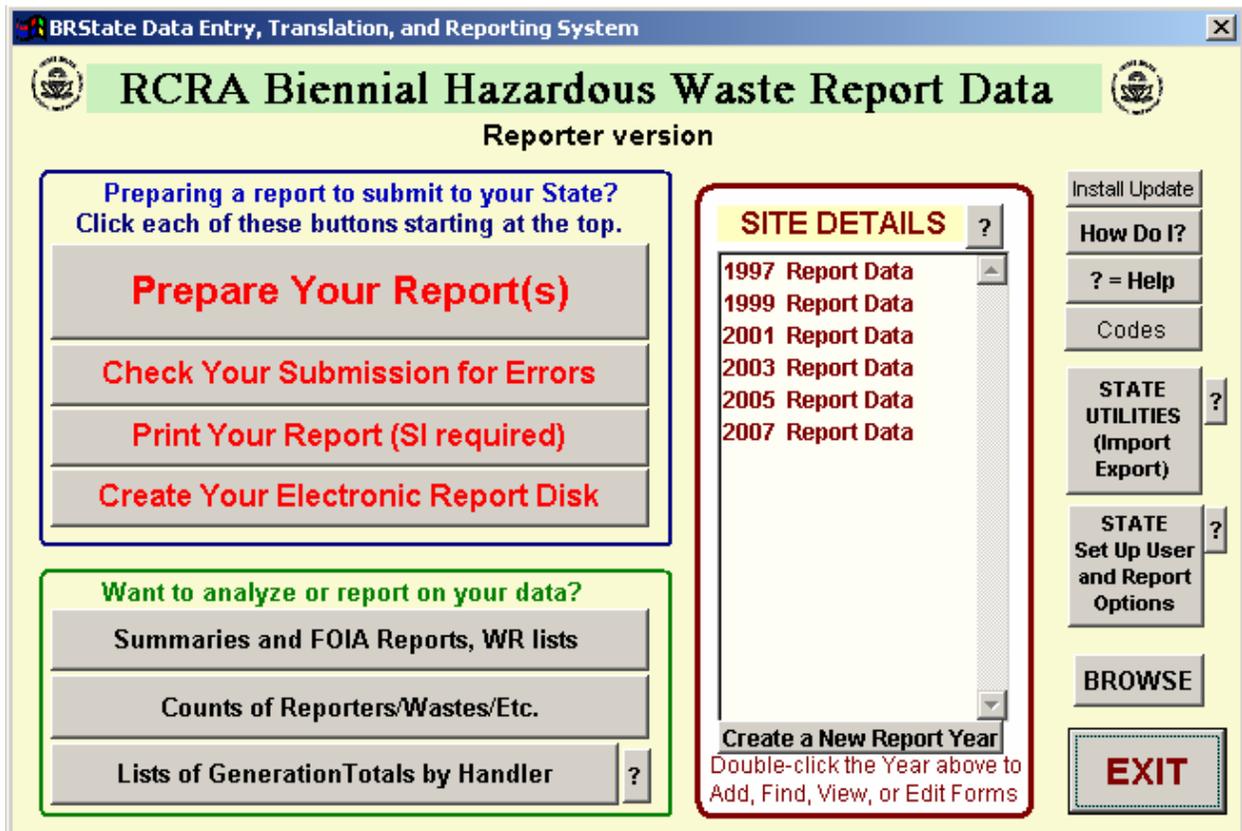
There is some confusion regarding the interpretation of page 19 of the instructions. If the wastewater entering the pretreatment system is exempt (as per the RCRA pre-treatment exemption) but in the course of pretreatment, a sludge is generated that **is** a hazardous waste, only the sludge should be listed on the GM form. The wastewater is not reportable under RCRA, as it is reported as part of your RIPDES permitting.

7. Should I fill out an OI form?

The Department has decided that the information collected from these forms does not justify the burden on the regulated community. Therefore, this form does not need to be filled out.

Instruction for using Florida BRS State Program to create Hazardous Waste Reports for Rhode Island.

1. Download and run WebBr2009.exe from the following web site at the Florida Department of Environmental Protection:
http://www.dep.state.fl.us/waste/categories/hazardous/pages/BRS_data.htm
2. This will install the software on your computer. The setup routine will guide you through the installation where you are asked to enter your name and organization, then select file locations (C:\BRS is the default).
3. When the program is installed you can run it from the start menu by selecting programs and "brs data"> BrsState.
4. From the screen pictured below, select "create a new reporting year".



5. Next Click on the **User and Report Options** button
6. You should then see the screen below. On that screen make the following changes:
 - Make sure the "Easy Report Version" checkbox is checked
 - Make sure the year is 2009
 - Make sure the "state waste codes" box is checked

- “form OI required by State” box is unchecked. Also the Primary origin state should be RI.
- When finished, then select **save/exit**.

BRState Program Options

Ver.8.1.7 V 8.1.4 From the Internet Download Update Info at EPA

Organization Name Reporter version

Primary Origin State RI DEO

Notify report submittal to EMAIL: mark.dennen@dem.ri.gov

Easy Report
 TSD or State/Region
 Multi-State DataBase
 Defaults Settings

Region and Statelist (opt.) Default report Year 2009

Exempt Systems List ("M134","M135","M136") (Before 1999)

Transfer Origin Type E R for Region (Before 1999) **Set Exemptions/Universal/Codelists**

Subpart K Adopted HSM/DSW Rule Adopted

The Report data is in directories like BRS2005, BRS2007, etc in this Base Directory:

Base Data Path C:\BRS\ **New**

Temporary (work files) Path C:\BRS\

Usual Export Path C:\Brs\

Usual Import Path C:\Brs\

Use/Require:
 Form
 Source
 Origin
 System
 SIC
 State Waste Codes
 Read Only
 Form OI Required by State
 Rebuild Facilities List

Save/Exit
Help
 Edit List
 Discard/Quit

7. Now you are ready to select “prepare your report” and enter the appropriate data for 2009.