



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF WASTE MANAGEMENT
235 Promenade Street, Room 380
Providence, Rhode Island 02908

Updated: January 13, 2016

2015 Hazardous Waste Report

The 2015 Hazardous Waste Report (a.k.a. Biennial Report or BRS) Instructions and Forms along with appropriate software are currently available.

Generators who have fewer than 10 waste streams are allowed to report either on paper or using the Florida BRS software. Generators with more than 10 waste streams are required to use the BRS State Software. Generators are welcome to use other software to prepare reports as long as they comply with EPA's Data submission standards. If you wish to preload data from the last cycle and cannot locate your 2013 biennial report data, please contact [Mark Dennen](#) and it will be sent to you.

Forms and software are available at the link below:

- [2015 Biennial Report Instructions and Forms](#)
- [Instructions for Downloading Florida DEP BRSW Software](#)
- [Download 2015 Florida DEP BRSW Biennial Reporting Software](#)

For electronic submissions, the data can be sent by email but federal guidelines require that the Site ID form be printed out, signed and sent to:

Mark Dennen
RIDEM/Office of Waste Management
235 Promenade Street
Providence, RI 02908

We are requesting other forms be submitted electronically (submission of paper copies of GM forms is not required). Other forms should be included on a CD or sent by email to mark.dennen@dem.ri.gov. However, you must print out and sign the Site ID Form.

In order to help you better understand what is required of you, we 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 Hazardous Wastes: Although they are not counted in the calculation of Large Quantity Generator Status, all your hazardous waste streams should be reported including Rhode Island Hazardous Wastes (R codes).

Exported Waste: In order that the Department may have a complete picture of each hazardous waste generator, wastes that are exported directly to a foreign country should be reported.

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

Due date: The report is due on **March 1, 2015**. A 30 day extension will be granted following a formal request by email.

The Department does not intend to conduct formal training, however, we will make individual appointment to help generators complete their annual reports. To set up an appointment or if you have any further questions or concerning Biennial Reporting, please contact Mark Dennen at (401) 222-2797 ext. 7112 or by e-mail at mark.dennen@dem.ri.gov.

FREQUENTLY ASKED QUESTIONS

ABOUT THE HAZARDOUS WASTE REPORTS (BRS)

1. Am I required to fill out a Hazardous Waste Report (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 2015) 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 2015 at all. Do I need to fill this out?

If you never met the definition of a Large Quantity Generator (LQG) in any month in 2015, then you only need to complete the enclosed change of status form to Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator or Non-Generator 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, the Department will give that company notice in writing to require it to fill out a Hazardous Waste Report.

4. I was a Large Quantity Generator for part of 2015 but am not now. What should I do?

If you were a Large Quantity Generator for any period in 2015, you are required to file. However if you are no longer a large quantity generator, or do not generate at all, complete the Site ID form for site status indicating non generator or small quantity generator in accordance with you **current** status.

5. Should I report State-only wastes and exported waste?

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 wastewater. 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.