



## **Rhode Island Department of Environmental Management**

235 Promenade St., Providence, RI 02908-5767 TDD 401-222-4462

**Attn: Large Quantity Generators**

January 22, 2014

Regarding: **2013 Hazardous Waste Report**

**Dear Large Quantity Generator**

This letter is to give you official notice that the 2013 Hazardous Waste Report (a.k.a. Biennial Report or BRS) Instructions and Forms along with appropriate software are currently available.

The reporting rules have changes very little since the 2011 cycle. Some codes have been consolidated (management method codes) or revised (waste minimization and NAICS codes). A complete list of changes, along with instructions, can be found on page 2 of the Hazardous Waste Report Instructions at <http://www.epa.gov/wastes/inforesources/data/br13/br2013rpt.pdf>

A 2013 update of the Florida Software (click) for preparing Biennial Reports is available by clicking [here](#). The program is called webbrinstall2013.exe and is found right below the Data Download Information Cells. 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 2011 biennial report data, please contact [Mark Dennen](#) and it will be sent to you.

We are requiring the Site ID form be printed out and 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 disk, CD or sent by email to [mark.dennen@dem.ri.gov](mailto:mark.dennen@dem.ri.gov). 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 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 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, 2014. A 30 day extension will be granted following a formal request.

**Training:** To assist the regulated community, the Department will conduct generator training of biennial reports, as well as the [new regulations](#) and waste determination issues. The agenda and date will be announced shortly.

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](mailto: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 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 2011) 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 2013 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 2013, 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 2013 but am not now. What should I do?**

If you were a Large Quantity Generator in 2013 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 you **current** status. The Department is not requiring reporting for Small Quantity Generators for 2013.

**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 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 WebBr2013.exe from the following web site at the Florida Department of Environmental Protection:  
<http://www.epa.gov/wastes/inforesources/data/br13/br2013rpt.pdf>
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).

You may see an pop-up that shows an icon of a small computer and asked you to install all files, select the icon to install the files. You may also get a message from your firewall or anti-virus software warning you that the program is from an unknown source and asking you if you are sure you want to install.

3. When the program is installed you can run it by selecting the BrsState icon on your desktop.
4. 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).
5. When the program is installed you can run it from the by selecting the BRSW icon on your desktop.



6. Next Click on the **User and Report Options** button
7. 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 2013
  - 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**

- Now you are ready to select “prepare your report” and enter the appropriate data for 2013.