

Massachusetts Department of Environmental Protection
Bureau of Waste Prevention - Division of Planning and Evaluation
INSTRUCTIONS FOR THE 2007 HAZARDOUS WASTE REPORT
(2007 BIENNIAL REPORT)

General Instructions

- PURPOSE** The Biennial Hazardous Waste Report provides Massachusetts Department of Environmental Protection (MassDEP) and the United States Environmental Protection Agency (USEPA) with valuable information on the types, quantities and final destinations of waste generated and managed in this state.
- WHO MUST FILE** Any facility that was a Large Quantity Generator (LQG) or a Treatment, Storage or Disposal Facility (TSDF) during the calendar year of 2007 must complete a Biennial Report.
- An LQG is any facility that generates over 2200 pounds of RCRA waste or 2.2 pounds of an acute RCRA waste in any calendar month.
- AUTHORITY** Massachusetts Regulation 310 CMR 30.332 requires that LQGs submit the Biennial Report. 310 CMR 30.544 requires TSDFs to submit the report. 310 CMR 30.303 requires use of the Massachusetts Notification of Hazardous Waste Activity Form
- DUE DATE** March 1, 2008
- MAILING TO MASSDEP** Mail the Biennial Report to:
- Massachusetts Department of Environmental Protection
One Winter St., 7th floor
Boston, MA 02108
Attn: Biennial Report/Pamela McDowall
- WHAT TO DO IF YOU THINK YOU ARE NOT REQUIRED TO FILE** If you are a currently maintaining a facility generator status of LQG, but did not generate at LQG levels during any calendar month of 2007:
1. Send a letter on your company letterhead certifying that at no time during 2007 has your company been an LQG.
 2. Include in your letter your company EPA ID number and the name, signature, and title of an authorized company representative.
 3. The letter must state that your company did not generate over 2,200 pounds of RCRA waste or 2.2 pounds of an acute RCRA waste in any calendar month during 2007.
 4. Indicate in the letter whether or not your company wishes to change its LQG status to Small Quantity Generator (SQG), or retain its LQG status, in anticipation of generating large amounts of waste in the future. If you wish to change your status, you must complete and submit a Notification of Hazardous Waste Activity in Massachusetts Form (hwactvty.doc)
- WHERE TO GET THE FEDERAL REPORT FORMS** Links to the EPA 2007 Hazardous Waste Report Instructions and Forms can be obtained at the following URL: <http://www.mass.gov/dep/recycle/hazardous/reports.htm#biennial>

STATE REGULATED WASTES

The forms have fields for state regulated wastes. Massachusetts LQGs and TSDFs should leave the state waste codes blank. State wastes should NOT be reported. The only exception to this is the Notification of Hazardous Waste Activity in Massachusetts Form (hwactvty.doc).

FORM TYPES, HOW MANY, AND WHICH TYPES

- ✓ **Notification of Hazardous Waste Activity in Massachusetts Form:** This form MUST accompany your submittal as a signed paper document. Filling this out incorrectly will result in complications in your facility's fees, federal and state inspection targeting and reporting requirements.
- ✓ **RCRA Subtitle C Site Identification Form (SI form):** Instructions for the use of this form begin on page 6, please read and follow them carefully.
- ✓ **GM form:** One form is required *for each waste stream generated*, if any.
- ✓ **WR form:** This form is only required IF the facility receives hazardous waste from a different generator. One WR form is required for each waste stream received for each generator sending the waste.

If no waste was received from another generator or if the only waste taken in was from Very Small Quantity Generators who self-transported the waste to your facility, no WR form is required.
- ✓ **OI/State Wastes Form:** Massachusetts does NOT require the OI form.

ELECTRONICALLY COMPLETING THE FORM

MassDEP strongly encourages you to use one of the free software tools listed below to prepare your report. It cannot be overstated how much easier this software makes the preparation and submittal of the BR. Built in "wizards", validation routines and prompts make the submittal of a complete and accurate report far less complicated than a paper version of same.

Environmental Support Solutions, Inc., (ESS) has developed "Waste Reporter", a free software package that can easily be downloaded from the following website:
<http://www.ess-home.com/products/waste-reporter/>.

The State of Florida has a software program for completing the Biennial Report, [webBR2007.exe](#). Florida has made this available for generators in other states. You may download this software by visiting: http://www.dep.state.fl.us/waste/categories/hazardous/pages/BRS_data.htm

You may also use any other commercially available software. The commercially available software must produce the data files in the flat file form as specified by EPA. For more information on this, please go to the link listed under Flat File Specifications:
<http://www.epa.gov/epaoswer/hazwaste/data/biennialreport/index.htm>

PROCEDURE FOR USING COMMERCIALY AVAILABLE SOFTWARE

If you are using any commercially available Biennial Reporting software program other than Waste Reporter or webBR2007.exe:

1. Complete the validation steps in that software.
2. Validate the file using ESS' Waste Reporter. To do this you must go to the ESS Website, download Waste Reporter. Enter your SI form information, then select the import options from the menu of the form you are importing.
3. Validate the files using the Validate Data function, and then create your Submittal File
4. Follow the instructions with the software to copy the appropriate flat files onto a CD.

USING EXISTING DATA IN YOUR COMPUTER

If you are extracting the data for the Biennial Report from your own computer, you may create flat files from your data for reporting. You must check that the data and file formats are correct by using Waste Reporter as follows:

1. Extract your data from your computer into the EPA Specified Flat File Format
2. Follow the instructions above in the section: **PROCEDURE FOR USING**

COMMERCIALLY AVAILABLE SOFTWARE

3. Use Waste Reporter's Validation function to perform error checks: confirm that your extracted data does not contain any fatal errors, and confirm that any information that error messages marked as "warning" or "check" is accurate.
4. After validating your data, create your Submittal File.

Note – Ignore the EPA Specified layout for the SI file, and simply key this information into the SI form in Waste Reporter.

VALIDATING DATA WITH WASTE REPORTER

All Biennial Report submittals must have their data files validated using the "Validate Data" function within Waste Reporter. Please follow the instructions in the software package. If your submittal does not successfully validate, it will not be considered valid by MassDEP.

SUBMITTING AN ELECTRONIC FILE

1. Copy the appropriate files onto a CD. Label the CD with:
Site name
Site EPA ID #
Contact Name
2. Send the CD, and both the signed paper SI form and the signed paper Notification of Hazardous Waste Activity in Massachusetts Form (hwactvty.doc) as your submittal via US Mail or its commercial equivalent.
3. If you are completing reports for multiple locations, submit the reports in separate envelopes.
4. Print out a hard copy of the entire submission for your Site's own records.

SUBMITTING PAPER FORMS

1. Read the Instructions and Forms section for instructions on filling out a Biennial Report.
2. Complete and sign the Notification of Hazardous Waste Activity in Massachusetts form (hwactvty.doc).
3. Fill out the SI form as well.
4. Fill out one GM form for each waste stream generated and one WR form for each waste stream received from a given generator.
5. Please see the Tips, Common Questions, and Common Mistakes section below, and the instructions with the Federal Forms for additional guidance on each form.
6. Make a copy for your records and submit the report.

CONFIDENTIALITY

If a handler wishes its Biennial Report to be handled as confidential, then all of the following must be included with the submission:

1. A letter, outlining the specific material claimed as confidential and the reason for the confidentiality claim,
2. The completed Biennial Report forms and/or disks (including all confidential data) must be submitted to the Department with all the confidential pages and/or disks/CDs marked "CONFIDENTIAL", and
3. A second sanitized copy of the completed Biennial Report forms and/or disks with all the confidential material masked (see the example below). This copy will be used for data entry into EPA's data systems.

NOTE: All pages and disks/CDs marked confidential will be considered as confidential.

CAUTION: Any report received without a NON-CONFIDENTIAL sanitized copy will be considered incomplete. If any of the previous steps are not completed, the handler's confidentiality claim could be invalidated.

Example

A commercial handler who receives waste from off-site customers wishes to keep its customer identities confidential. This handler must report the receipt of these wastes on WR Forms. In order to keep these customer names confidential, the handler must complete two sets of WR forms, one containing complete customer information (and stamped confidential) and another complete set of forms (NOT MARKED CONFIDENTIAL) with the customer's EPA ID number masked in the following manner.

For example:

EPA ID number of generator

MAD912345667

CTD342100090

MV5083297654

NHD980128392

Masked EPA ID number

MAD9999999999

CTD9999999999

MV9999999999

NH9999999999

REPORTING OUT-OF-STATE GENERATORS WITHOUT 12 DIGIT ID NUMBERS ON THE WR FORM

Some waste generators do not have ID numbers. Some states, such as Connecticut, do not assign ID numbers to their conditionally exempt generators. This creates a problem for Massachusetts' facilities reporting on the WR form. These out-of-state generators commonly complete the generator EPA ID number section on the manifest with "CESQG" or "VSQG" or "No number".

Complete the WR form for these generators or facilities by entering the two-letter state abbreviation for their location followed by CESQG for generators. If you are filing electronically, populate the rest of the field with nines (9).

For example: A Connecticut CESQG could appear on the WR Form as CTCESQG99999

**REPORTING
FOREIGN
GENERATORS OR
DESTINATIONS**

Report foreign generators or destinations as having an ID number by putting "FC" (the indicator for Foreign Country) in front of the country of origin (if a generator) or country of destination (if shipping to a foreign facility)

NOTE: The ID number for the foreign facility code cannot be longer than 12 digits, so it must be truncated if necessary (see examples for Great Britain and Switzerland below). If you file electronically and the field value is less than 12 characters, pad the remainder of the field with blanks.

For example:

Foreign TSDF or Generator

Canada

Mexico

Great Britain

Switzerland

EPA ID Number

FC Canada

FC Mexico

FC Great Bri

FC Switzerla

RECYCLING

Material sent off-site as an MA97 to a recycling facility, in accordance with a Class A permit issued by MassDEP, should not be reported as waste generated for the Biennial Report.

Recycling Facilities holding a Class C recycling permit are required to complete a Biennial Report for the recycling wastes received and/or treated on-site per 310 CMR 30.295 (2)(b).

**TELEPHONE
ASSISTANCE:**

If you call MassDEP, please leave a detailed voice mail message and your call will be returned as soon as possible. Please call the Department **ONLY** after you have read the EPA Biennial Reporting Instructions. Your cooperation is appreciated.

Michael Hurley: 617-292-5633

Pamela McDowall: 617-292-5849

For questions regarding Waste Reporter only: 888-766-0220

Tips, Questions, and Common Mistakes

ALL FORMS

- ✓ Site Name and ID Number is either not legible or not on each page.
The company name and EPA ID number must appear on the top of all pages of the form.
If the pages of the report become separated, unlabelled pages may be misplaced.
- ✓ Entries are illegible
The entries are not completed in ink or typewritten.
All forms must be legible or they will be returned.
- ✓ Computer generated versions of the reporting forms are acceptable as long as all the text and data fields (whether used or not) are located on the facsimile in the same location and with the same text and labeling as appears on the original forms. The facsimile must be sufficiently similar to the original that a side-by-side comparison is needed to see the differences.

**MASSACHUSETTS
NOTIFICATION OF
HAZARDOUS WASTE
FORM**

- ✓ *Site Owner /Site Operator Incomplete or Incorrect:*
Site Owner: Enter the business name of the **owner** of the property.
Site Operator: Enter the name of the company that is **operating** the process that generates the waste. These are often the same entity.

**SITE
IDENTIFICATION
(SI) FORM**

- ✓ *NAICS Code missing:*
For NAICS information or go to: <http://www.naics.com/search.htm>
- ✓ *Contact Name Missing or Incorrect:*
Enter the name of a person at your facility who can most easily answer detailed questions about the report. For example, this person must be sufficiently familiar with the report that they can respond to questions about a missing density value or an invalid EPA ID number.
- ✓ *The Certifier's signature, printed name, or date is missing:*
If any of Section 13 is incomplete the report may be considered incomplete and returned.

- ✓ *EPA ID Number either is not entered or is entered incorrectly on the second page:*
The Top left of the second page of the SI Form has a space for the EPA ID number. The EPA ID number must be entered.
- ✓ *EPA and State Waste Codes (Sections 11 and 12) are optional on the SI:*
The ESS Waste Reporter Interview offers Auto-Fill buttons that copy waste codes from the GM or WR form into these Sections, so, if you are reporting waste codes on the SI form, consider completing GM and WR forms first so that auto-fill function is usable.

**Hazardous Waste
Activities
Question 1**

Generator of Hazardous Waste:
You should complete this section based on your generation level as of the **DATE you signed the form**. If your company operated as an LQG for part of the calendar year 2007, but has changed status to SQG since, you should check of the SQG box. Filling this out incorrectly will result in complications in your facility's fees, federal and state inspection targeting and reporting requirements.

**Transporter of
Hazardous Waste:
Question 2:**

Check NO unless you have applied for and been granted a hazardous waste license with MassDEP for this location.

**Treater, Storer or
Disposer of Hazardous
Waste: Question 3**

Check NO if you only store hazardous waste on site for 90 days (LQGs), 180 days (SQGs). This is considered storage exempt from permitting

**Exempt Boiler and/or
Industrial Furnace:
Question 5**

Check NO if you only have a recycling permit from MassDEP for a Waste Oil Space Heater. Waste Oil Space Heaters are not considered On-Site Burners, or Industrial Furnaces.

GM FORM

- ✓ *Waste Description-missing or incorrect:*
The waste description is NOT the same as the Department of Transportation (DOT) description. It must include the type of waste, sources, type of hazard and generic chemical name of the material or primary hazardous constituents. (See Page 12 in the instructions)
- ✓ *Missing or too many RCRA Codes:*
All RCRA Hazardous Wastes must be included on the Biennial Report forms. All RCRA wastes have at least one waste code. Some lab packs have many waste codes. Enter up to the first 25 codes.
- ✓ *Source and Management Codes:*
All wastes reported on a given GM form should have the same Source and Management Method (Section 1.D) and Form code (Section 1.E). If they do not, report the code representing the majority (by volume or weight) of the wastes on the GM.
- ✓ *On-site Treatment Box or Off-site Treatment Box not checked off:*
Section 2 asks if the waste was treated on-site. If you answer yes, you are asked to supply more information about the treatment of the waste. Section 3A asks if the waste was shipped off-site. If you answer yes, you are asked to supply more information about the destination of the waste.
- ✓ Report residuals on a GM that has 'G25' in Source (Section 1.D) and an appropriate Management Method. If the process from which the residual must also be reported, use a second GM form and be sure that the latter's GM On-site Management Method (in Section 2) matches the former's Management Method (in Section 1.D).
- ✓ Report two On-Site Management Methods on a single GM form only when the two processes are used in parallel (e.g., one process for part of the year and another process for another part of the year). If two processes are used serially (e.g., one process is always immediately followed by another), choose the dominant process and report it consistently on your Report.
- ✓ You do not have to report on GM wastes that were exported directly to a foreign country; however, do include them when determining a Site's generator status. Report exports on the Annual Report required under 40 CFR 262.56.
- ✓ Both Section 2 and Section 3A are YES or NO questions. You MUST check either YES or NO for each of these questions.
- ✓ *Missing unit of measure:*
If the unit of measure is missing or illegible, MassDEP cannot tell how much waste was generated. *For example, an entry of "55" could refer to 55 pounds or 55 cubic yards of RCRA hazardous waste. Without the unit of measure code, the number entry is meaningless.*
- ✓ *Missing or Incorrect Densities:*
If the quantity of waste generated, treated, or received is reported in gallons, liters or cubic yards, the density of the waste **must** also be entered, and entered correctly. The amount of waste reported as generated could be greatly inflated if the incorrect density type box is checked off. *For example, if the box next to "sg" (specific gravity) is checked off, when "lbs/gal" (pounds per gallon) is the actual answer, the reported amount of waste generated will be 8 times greater than the actual weight of the waste.*

If you are not sure of the density of your waste, first check the Material Safety Data Sheet for the raw materials that eventually become the waste stream. Material Safety Data Sheets report the density or specific gravity of the material you received. Second, check with the facility that received your waste. They may have weighed it when received. Otherwise estimate it using the table below.

Material	Solid/Liquid/Gas	Pounds per Gallon	Specific Gravity
Water	Liquid	8.34	1
Gasoline	Liquid	5.5 to 5.75	.66 to .69
Petroleum	Liquid	5.5	0.66
Sulfuric Acid (66° Baume)	Liquid	15.31	1.83
Elemental Mercury	Liquid	113.4	13.6
Cement-Set	Solid	22.5 to 25.0	2.7 to 3.0
Wood –Oak	Solid	5.0 to 7.5	.6 to .9
Brick	Solid	11.7 to 18.35	1.4-2.2
Dry Air (20C, 760 mm Hg)	Gas	0.01	0.0012

From CRC Handbook of Chemistry and Physics, 64th edition

- ✓ *Total Quantity Shipped is reported in more than one or incorrect units of measure:*
The Amount of Waste shipped off-site must be reported in the same unit of measure as the amount generated. If your facility has a waste stream that was shipped in both pounds and in gallons in 2007, pick the unit of measure you are going to use to report, and convert the amounts of all the shipments into that unit of measure.

- ✓ *Wrong Facility ID Number:*
You must list a 12-digit EPA ID number for the facility receiving the waste. Enter the EPA ID number of the **receiving** facility listed on the manifest, even if that facility only stores the waste for consolidation, and then transports the waste to another facility. When a waste is first shipped to a facility for storage or consolidation, the storage/consolidation facility will then report on its Biennial Report that the material was shipped off-site to the second facility.

It is very important that you only list the TSDF shown on the manifest as the receiving facility and not list the ultimate destination or ultimate system type of the facility.

- ✓ *Wrong Off-Site Management Method Code:*
Most wastes sent to a Massachusetts' facility is subsequently moved to another facility for final treatment. You must report the system type that best describes what occurred to the waste at **the facility listed on the manifest**. For example, if you contracted to have your waste blended for its fuel value, you still enter the code for STORAGE (H141) unless the fuel blending is actually occurring at the facility listed on the manifest. The TSDF you ship to identifies how it handles your waste on the manifest copy sent back to you in section K of the manifest. For example, if the facility enters a handling code of S01 or S02, then the waste was stored in containers or tanks respectively and must be reported as H141 on the Biennial Report.

WR FORM:

- ✓ *Waste Description:*
The waste description is not the same as the DOT waste description.
- ✓ *Too Many Waste Codes:*
Often lab pack waste streams involve many waste codes. See the special instructions for lab packs in the instruction book to see if you can reduce the number of codes. If not, only report the codes for the most hazardous (ie: acute wastes) and the most common 25 waste codes for the lab pack.
- ✓ All wastes reported on a single WR form must have the same Off-site handler EPA ID (Section 1.D), Form code (Section 1.G), and Management Method (Section 1.H).

OI FORM

- ✓ *Not Required*