

## What Happens to my Annual Report After It's Submitted?

By Connie Livchak

January brings snow, goals and a brand new calendar on which to place key dates. Those responsible for your organization's Hazardous Waste Annual Report probably have already marked March 1<sup>st</sup> as the date the annual report is due. We know preparation of the annual report takes a good deal of effort. So what actually happens to this report after it's submitted to Ohio EPA's Division of Hazardous Waste Management (DHWM)?

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## DHWM Review of Paper Annual Hazardous Waste Reports

Currently, there are two ways to submit the annual report: by sending an electronic report using [eDRUMS](#) or sending a paper report. Review of paper reports takes several additional steps to ensure they are completed correctly. DHWM looks for eight items when reviewing your annual report for acceptance.

- Use of current Ohio report forms. Your report could be rejected if you are not using the current Ohio Annual Report Form. Old forms don't include recently added fields, such as waste minimization codes first required on the 2009 report. Also, federal forms are STRONGLY DISCOURAGED because they omit portions of the forms specific to Ohio, such as the overall hazardous waste generator status.
- Site ID form - Section 1 – Reason for Submittal. If your facility generates hazardous waste, check both the second box *To Provide Subsequent Notification* **and** the fifth box *As a Component of a Hazardous Waste Report...*
- Site ID form - Section 8 – Legal Owner/Operator. Completed information on both the owner and operator, including the date they became such.
- Site ID form - Section 9.A.1 – Hazardous Report Generator Status. If the status is anything other than non-generator, you must provide your waste code(s) in Section 10.
- Site ID form - Section 12 – Certification. Be sure the form sent to DHWM has the original signatures of an authorized representative.
- GM Form – If your waste minimization code is either "Y" or "N," add comments if you claim minimization, make sure it truly is the result of minimization efforts and not simply due to a decrease in production.
- OI Form – Up to 5 transporters and receivers can be listed on each OI page. List each transporter and receiving facility once only. DO NOT send one OI for each GM form.

- Overview – Review your form to make sure required fields are completed.

After accepting the report as complete, DHWM employees enter the data digitally and reviewed again for possible typographical errors. From this point on, paper reports follow the same quality control process as electronically submitted reports.

## Electronic Annual Hazardous Waste Report Review

Each year, TSD reports are typically the first reports reviewed to resolve any issues because the data provided will be cross-checked with the generator reports. Generator reports are then reviewed in descending order of tonnage. Annual report review includes three main steps.

- **Running a validation report and addressing all the identified issues.** A comparison of quantities and management method codes for waste shipped to TSDs versus the waste receipts (WRs) reported by the TSDs. If we compare what the generator says they shipped to what the receiver says they received and they aren't within a margin of error, we will contact the generator and/or the TSD. Because reporting accurate quantities is so important, keep good records and reconcile manifests, weigh tickets and documents with quantities received from the TSDs to determine correct quantities to report.
- **Review each GM page looking for required information that is missing or appears unusual in context.**
- **Review the waste minimization code on each page** – if it is Y or N, be sure comments are included and that they reflect intentional minimization procedures rather than incidental reduction.

If a discrepancy is found between the generator's shipment quantities and a TSD's waste receipts, generally the generator is contacted first. If we contact you for this reason, please review your manifests and be sure the reported quantities are correct. If necessary, contact the TSD to resolve the difference. There are several possible causes of these discrepancies, ranging from a simple matter of differing densities used in calculating weight from volume, or just a typo or a mistake recording the waste shipped on the manifest or received at the TSD.

An overview of how the annual report data is used is provided in the [Spring 2010 Notifier](#) article, beginning on page 3. Ohio's annual report data is compiled biennially by the U.S. EPA, the latest being the [2009 National Hazardous Waste Biennial Report](#).

## Annual Report Resources

Filers are encouraged to submit their annual report electronically through eDRUMS. If you have questions about eDRUMS or need help completing the report, please contact the MaryAnn Silagy at (614) 644-2891, [maryann.silagy@epa.ohio.gov](mailto:maryann.silagy@epa.ohio.gov) or Paula Canter at (614) 644-2923, [paula.canter@epa.ohio.gov](mailto:paula.canter@epa.ohio.gov). Web resources, including the annual report form and instruction booklet, are available on the [annual reports webpage](#).