

Hazardous Waste Report Rule Change for 2013 Frequently Asked Questions and Answers

1. When will the Biennial Report be due and what does it cover?

Answer: The Hazardous Waste will be due in even-numbered calendar years, and will cover the prior odd-numbered year's data. The Hazardous Waste Report that is changing from annual to biennial will collect data only from the odd-numbered year; it does NOT include two years of data.

2. Will we be required to provide even-numbered year generation data on Form GM?

Answer: Section 2 Box A of Form GM is for reporting the amount generated in the previous year. This box has always been optional and will remain that way.

3. Does a 2012 report need to be submitted?

Answer: The Hazardous Waste Report that would be due (under currently effective rules) on March 1, 2013, reporting 2012 data, is NOT required to be submitted, even if these proposed rule amendments are not yet effective by that date. The next date a Hazardous Waste (Biennial) Report will be due is March 1, 2014.

4. Does this change affect the ground water monitoring annual report?

Answer: No. The ground water monitoring reports are NOT being changed to a biennial reporting frequency and are still due on March 1, 2013. The proposed change from annual to biennial reporting applies only to the report typically referred to as the Hazardous Waste Report.

5. Are there any changes to other paperwork requirements?

Answer: The rule amendments in proposed rule 3745-52-40 do NOT change any recordkeeping or record retention requirements. Copies of manifests or other shipping or transport-related documents, generator records, waste descriptions, waste analysis, etc. are still required to be maintained, as indicated in the rule. These records are required to be maintained and available for inspection regardless of whether they are used to compile a Hazardous Waste Report.