

**Ohio Environmental Protection Agency**  
**Division of Environmental Response and**  
**Revitalization**



**Ohio Biennial Hazardous Waste Report**  
**Instruction Booklet**  
**December 2023**

## WHO MUST FILE THE HAZARDOUS WASTE REPORT

### SITES REQUIRED TO FILE THE REPORT

The following activities require the filing of Hazardous Waste Biennial Report. The rule references are the basis for the requirement.

- The site was a **Large Quantity Generator** in one or more months of an odd-numbered calendar year (3745-52-41) and did not opt into the Episodic Generator Provisions
  - Generated in any one month more than 1000 kg/ 2200 pounds of non-acute hazardous waste
  - Generated in any one month more than 1 kg/ 2.2 pounds of acute hazardous waste
- The site is a **Treatment, Storage, or Disposal Facility** (TSDF) that received waste from off-site or managed their own waste on-site (3745-54-75 and 3745-65-75)
- The site is a **Recycler** of hazardous waste
  - Who does not store recyclable materials before recycling them (3745-51-06(C)(2)(d))
  - Who before recycling, stores recyclable materials for up to 72-hours after arrival at the facility (3745-51-06(C)(3)(a)(xv))
- The site is a **Reverse Distributor** of pharmaceuticals (3745-266-510(C)(9))

See the **WHICH FORMS TO SUBMIT AND WHAT TO REPORT** section of this booklet to determine which forms must be submitted. The completed report should be received by Ohio EPA no later than March 1. In years where March 1 falls on a Saturday or Sunday, the due date is the following Monday.

As of 10/5/2020, all LQGs are required to re-notify every two years per OAC rule 3745-52-18(D)(2), which can be satisfied by filing the Biennial Hazardous Waste Report. If the site is listed as a LQG in the federal RCRAInfo database but does not file a Biennial Report, it will appear to be out of compliance with both the notification and Biennial Report requirements. If the site is no longer an LQG, please re-notify to provide the correct generator status so that Ohio EPA and US EPA have current information about the site's regulated hazardous waste activities.

To find out whether Ohio EPA lists your facility as an LQG, use [RCRAInfo Web](#). Click on Hazardous Waste Sites and then Search by Site. The quickest way to search is by the site's ID number (also known as an EPA ID, HW ID, or RCRA ID). Click on the search results to view the current site details.

## **SITES NOT REQUIRED TO FILE THE REPORT**

If the site is not required to file a Biennial Hazardous Waste Report but you would like to send us an update on the site's regulated activities, please submit a RCRA Subtitle C Site Identification (Site ID) Form, indicating your current generator status and any other regulated activities. Please note any unusual circumstances in the comments section. The Site ID Form can be filed electronically using myRCRAid. More information about this as well as a Word version of the paper form can be found on Ohio EPA's [Notification of Regulated Waste Activity web site](#).

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## **PURPOSE OF THE HAZARDOUS WASTE REPORT**

The Ohio Environmental Protection Agency's (Ohio EPA) mission to protect human health and the environment includes the responsibility to effectively regulate, with the federal government, the management of hazardous waste generated in the state. As part of this task, Ohio EPA and U.S. EPA collect and maintain information about the generation, management, and final disposition of hazardous waste as regulated by the Resource Conservation and Recovery Act (RCRA), and about efforts to minimize these wastes.

Ohio EPA prepared this booklet to assist generators and owners/operators of treatment, storage, and disposal facilities in reporting their hazardous waste activities for the reporting year. The information collected from the reports will be used to:

- Provide Ohio EPA and U.S. EPA with an understanding of hazardous waste generation, management, and waste minimization activities in Ohio;
- Provide Ohio EPA with data to be used in its compliance assurance efforts;
- Communicate the findings to the public.

In order to accomplish these goals, the data you provide will be saved in a computer database by Ohio EPA, the authorized implementer of the Hazardous Waste Report program. The data will be forwarded to U.S. EPA in fulfillment of the Biennial Report requirement; sites do not have to submit two sets of reports. Your effort to carefully complete the required forms is greatly appreciated.

## **INSTRUCTIONS- HAZARDOUS WASTE REPORT**

### **INTRODUCTION**

This booklet is prepared by Ohio EPA to assist generators and treatment, storage, and disposal facilities with reporting their hazardous waste activities for the reporting year. Ohio EPA is the authorized implementer of the Hazardous Waste Report program in Ohio.

### **AUTHORITY**

Your site may be required to file this report under the Resource Conservation and Recovery Act (RCRA) of 1976.

The authorizing legislation for the Hazardous Waste Report is contained in Sections 3002 and 3004 of the RCRA of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA). Section 3002 requires hazardous waste generators to report to U.S. EPA or

authorized States, at least every two years, the quantities, nature, and disposition of generated hazardous waste and the efforts taken to reduce the volume and toxicity of hazardous waste in comparison to previous years. Under the authority of Section 3004, U.S. EPA has extended the reporting requirements to treatment, storage, and disposal facilities for the wastes they receive.

Ohio rules require this report to be filed biennially. Ohio's Hazardous Waste Report regulations are contained within rules 3745-51-06(C)(2)(d); 51-06(C)(3)(a)(xv); 52-41, 54-75, 65-75, and 266-510(C)(9) of the Ohio Administrative Code (OAC). You can obtain a copy of Ohio's hazardous waste regulations by contacting Legal Records at (614) 644-2129. The rules are also available on the [Division of Environmental Response and Revitalization's \(DERR\) Web page](#).

## **OVERVIEW OF THE HAZARDOUS WASTE REPORT**

To determine if you are required to file the Report, please read WHO MUST FILE THE HAZARDOUS WASTE REPORT on the page between the cover and the Table of Contents.

**WHICH FORMS TO SUBMIT AND WHAT TO REPORT** describes circumstances and situations under which each of the forms should be completed.

Explanations of the general guidelines used to fill out the Report forms are specified in **HOW TO FILL OUT THE FORMS**.

**WHEN AND WHERE TO FILE** provides the filing date and return address for the completed forms.

The **REPORT SUBMISSION CHECKLIST** should be reviewed before mailing the forms. Detailed instructions for filling out each of the forms begins on page 20 starting with the Site Identification Form. A section of [Special Instructions](#) explains how to report lab packs, PCBs, asbestos and waste oils, etc. Definitions of key terms and explanations of acronyms and abbreviations are on page 68. Lists of codes that are too long to include in the text of the instructions begin on page 82 starting with the list of Source Codes.

## Changes for the 2023 Hazardous Waste Report

**PLEASE NOTE** that the following items are changes or additions to the 2023 reporting cycle:

- The following Management Method Code is no longer valid
  - H135- Discharge to sewer/POTW or NPDES (storage or transported prior to discharge to POTW or by NPDES)
- The following Management Method Codes were added:
  - H136- Discharge to sewer/POTW (with prior storage - with or without treatment)
  - H137- Discharge to NPDES permit (with prior storage - with or without treatment)
- Ohio EPA has amended the existing UW Rules in accordance with U.S. EPA's addition of Aerosol Containers to the Universal Waste Rules. Aerosol cans are no longer an Ohio-Specific universal waste, but they are still eligible to be managed as a universal waste under Ohio Administrative Code (OAC) rule 3745-273-06.
- Effective June 12<sup>th</sup>, 2023, facilities can notify that they are managing hazardous secondary materials (HSM) in compliance with OAC rules 3745-50-23, 3745-51-04(A)(23), (24), (25), or (27) or have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. This addendum has been added to the Site ID section of the electronic report. If you are filing via paper forms, you will need to complete and attach the additional HSM Addendum.
- A new validation check was associated with the regulated activity of "Recycler". If you check that your site is a recycler of hazardous waste, you must also check the "Receives Hazardous Waste from Off-Site" regulated activity.
- There are no "physical" changes to the Site ID, GM, OI, WR, and PS Forms for the 2023 reporting cycle.



## WHICH FORMS TO SUBMIT AND WHAT TO REPORT

### Site Identification Form

A site required to file the Hazardous Waste Report must submit the Site ID Form as a component of the Report. You will report your current overall Hazardous Waste Generator status as of the date of submitting your Report on the Site ID Form in Item 9.A.1 – Generator of Hazardous Waste. Your generator status may have changed since the calendar year the report is based on. The Site ID Form collects the site's generator status as of the form's certification date in section 9.A.1 and the generator status for the reporting year in 9.A.2. They can be different if the report is being submitted due to a short-term LQG event that occurred in the reporting year.

**If you did not generate hazardous waste at LQG levels at this site during the reporting year and you are not currently an LQG, please do not submit a report.** If you simply want us to keep you updated on changes to hazardous waste reporting requirements and information pertaining to the reports, please consider signing up for the Hazardous Waste Report listserv instead of submitting a report. To sign up, follow the instructions in the DERR section [here](#).

As of 10/5/2020, all LQGs are required to re-notify every two years per OAC rule 3745-52-18(D)(2), which can be satisfied by filing the Biennial Hazardous Waste Report. If the site is listed as a LQG in the federal RCRAInfo database but does not file a Biennial Report, it will appear to be out of compliance with both the notification and Biennial Report requirements.

If U.S. EPA's RCRAInfo database shows the site to be an LQG and it needs to be changed, Ohio EPA recommends that you update your generator status by submitting Ohio EPA Form 9029, the RCRA Subtitle C Site Identification form instead of submitting a report. Please visit DERR's Notification [webpage](#) to learn more. To find out whether Ohio EPA lists your facility as an LQG, use [RCRAInfo Web](#). Click on Hazardous Waste Sites and then Search by Site. The quickest way to search is by the site's ID number (also known as an EPA ID, HW ID, or RCRA ID). Click on the search results to view the current site details.

Instructions for the Site ID Form begin on page 20.

### GM Form

A site required to file the Hazardous Waste Report must submit a GM Form for all hazardous waste that was counted to determine the site's generator status. **Universal Waste is an**

**example of a waste that doesn't count toward generator status.** Hazardous waste must be reported if it was:

- Generated and accumulated on-site and subsequently managed on-site or shipped off-site in the reporting year
- Generated and accumulated on-site in the reporting year but not managed on-site or shipped off-site until after the reporting year; or
- Generated and accumulated on-site prior to the reporting year but either managed on-site or shipped off-site in the reporting year.

A separate and independent GM Form must be submitted for **each** RCRA hazardous waste **if** any one of the following is true:

- Generated on-site from a production process, service activity, or routine cleanup; Generated from equipment decommissioning, spill cleanup, or remedial cleanup activity;
- Shipped off-site, including hazardous waste that was received from off-site (reported on the Waste Received from Off-site Form [WR Form]) and subsequently shipped off-site without being treated or recycled on-site;
- Removed from on-site storage;
- Derived from the management of non-hazardous waste; or
- Derived from the on-site treatment (including reclamation), disposal, or recycling of previously existing hazardous waste (as a residual).

Instructions for the GM Form begin on page 42.

### **OI Form**

A site must complete an OI Form if it had RCRA hazardous waste transported off-site for treatment, storage, or disposal. Instructions for the OI Form are on page 52.

### **WR Form**

A site required to file the Hazardous Waste Report must submit a WR Form if, during the reporting year, it received RCRA hazardous waste from off-site and managed the waste on-site. Instructions for the WR form begin on page 55.

## PS Form

Commercial facilities which receive waste from off-site and are required to file the Hazardous Waste Report are requested to submit a PS Form that lists the influent quantity for each hazardous waste treatment, disposal, or recycling process system that operated during the reporting year. Instructions for the PS Form are on page 61.

**Do not report wastes that are not regulated under RCRA**, such as PCBs and asbestos, unless they are mixed with a RCRA waste. Also, do not include wastes that are defined as hazardous only by certain states (Michigan, New Jersey, etc.) and are not regulated by U.S. EPA. For more information, see the Special Instructions section. If the material is being used as a product, it is not a RCRA-regulated waste and should not be listed on the report. Do not assume that manifesting a material automatically qualifies it for inclusion in the Hazardous Waste Report; it must have federally recognized RCRA waste codes. Manifests are commonly used to ship all types of waste from hazardous to non-hazardous. Be sure you can distinguish between them.

## HOW TO FILL OUT THE FORMS

### Getting Help

To obtain assistance in filling out the forms in this package after you have read the instructions, please send an e-mail to [HWannualreport@epa.ohio.gov](mailto:HWannualreport@epa.ohio.gov). This e-mail box is monitored by support staff whose names are listed in the [Contact tab](#) on the Hazardous Waste Report web page.

DERR's main Hazardous Waste Reporting webpage is found [here](#). From there you can access a link to year-specific instructions and forms as well as a list of EPA hazardous waste codes and a national list of receiving facilities and their management method codes. There are also training resources for electronic reporting using eDRUMS that cover how to get an account, delegate permissions, and complete a report.

### Frequently Asked Questions

Listed below are frequently asked questions regarding Biennial Hazardous Waste Reports.

- Q. Does my paper-based report have to be at Ohio EPA on March 1 or can it just be postmarked by then?**
- A.** OAC Rule 3745-52-41 states that the Hazardous Waste Report must be submitted to Ohio EPA by March 1, not postmarked by March 1. It should be received at Ohio EPA by the end of the day. If March 1 falls on a Saturday or Sunday, the report would be due on the following Monday.

**Q. Do I need to file a Biennial Report with U.S. EPA in addition to the report I send to Ohio EPA?**

A. No. Ohio EPA forwards the data to U.S. EPA as required. The only report you ever need to submit is the one to Ohio EPA using Ohio's forms.

**Q. Should I list waste oil, asbestos, or PCBs on the report?**

A. No, not unless they are mixed with a RCRA-regulated waste. See the Special Instructions at the end of this document.

**Q. How do I report lab packs?**

A. See the Special Instructions at the end of this document. You can consolidate information based on specific criteria.

**Q. When determining the correct generator classification for my site, can I equate shipment with "generation"?**

A. No. Generator classifications are based on how much waste is produced in any one calendar month, not on when it is shipped. Classifications can change from month to month. If the material was a product but is off-specification and can't be used, it becomes "generated" when you determine it is no longer usable as a product.

**Q. If my site had a one-time activity that resulted in generation of more than 2200 pounds in one month, do I still have to file a report?**

A. Yes, unless the site submitted to Ohio EPA an Episodic Generator Addendum and Site ID Form as required to opt into the Episodic Generator rule provisions. The threshold for filing is generation of more than 2200 pounds in any one calendar month (or more than 2.2 pounds of acutely hazardous waste).

**Q. How do I report waste that was generated in the reporting year but hadn't been shipped by the end of the year?**

A. Report the total quantity generated on the GM Form, Section 2, Box B. In Section 3, list whatever portion was shipped, if any. The difference between the two will indicate waste that remained on-site at the end of the year. In Section 4, only TSD facilities that have a storage permit should list the quantities remaining on-site in the permitted storage area as of December 31.

**Q. If the material is shipped off-site and used as a substitute for a commercial product by the recipient, do I list this on the report?**

A. No. The material would not be defined as a "waste" under RCRA. See Chapter 3745-51 of the OAC (Hazardous Wastes Subject to Regulation) or call Compliance

Assurance staff for clarification at (614)644-2924.

**Q. Do I need to complete a separate OI Form for each GM Form?**

A. No. Each OI Form has space for up to four TSD facilities or Transporters. It is designed to eliminate redundant listing of TSD/Transporter names and addresses, because one facility may accept multiple types of waste and be listed on more than one GM Form in Section 3. Data on the OI Form links to all GM Forms submitted via the EPAID numbers of the TSD facilities, not to a single GM Form. Therefore, it is crucial that the EPAID numbers be accurately and completely listed on both forms.

**Q. Can I use the federal forms instead of Ohio EPA's?**

A. DERR discourages facilities from submitting Ohio Hazardous Waste Reports using U.S. EPA's Biennial Report forms. They are not identical, and it can cause problems with data entry and review. Ohio EPA encourages submittal of data via electronic reporting.

**Q. Can I fax the report to Ohio EPA?**

A. No. Faxed copies of the Hazardous Waste Report are not accepted because they do not have an original "wet ink" signature.

**Q. Can I get an extension to the March 1 submittal deadline?**

A. No.

**Q. Who should sign the Certification Statement on the Site ID Form?**

A. OAC Rule [3745-50-42](#) requires that all reports shall be signed by one of the following:

- A responsible corporate officer
- A general partner or proprietor
- For public agencies, a principal executive officer or ranking elected official
- A duly authorized representative of any of the three persons listed above.

The representative should be an individual having responsibility for overall operation of the regulated facility or activity. The authorization must be made in writing.

### **Documents Helpful in Filling Out the Forms**

In preparing the Biennial Hazardous Waste Report, you will need to consult your records on quantities and types of hazardous waste generated, managed, shipped and/or received in the reporting year. Some records that might be helpful are listed below:

- Copies of records of quantities of hazardous waste generated or accumulated;
- Hazardous Waste Manifest forms;
- Results of laboratory analyses of your wastes;
- Contracts or agreements with off-site facilities that manage your wastes; and Copies of permits for on-site waste management systems.

### **Code List**

Please use **only** the codes included or referred to in the instructions or lists of codes beginning on page 82.

### **Entry of Quantities**

When listing quantities on the Hazardous Waste Report, please write legibly. While most boxes allow free hand entry, there are a few boxes that have underlines for numerical entries.

### **Comments Section on Forms**

Use the Comments section at the bottom of the forms to clarify or continue any entry. Refer to the entry being commented upon by entering the Section number and Box letter (i.e., Section 4, Box F). Please make comments as concise as possible; there is space in Ohio EPA's database for 2000 total characters. If there are special circumstances regarding the site's hazardous waste generation activities, please note them in this section. A special circumstance that applies to the entire report should be stated in the Site ID Form Comments.

### **Page Numbering of Forms**

When you have filled out all the appropriate forms in the package, number the pages consecutively throughout. The individual page number and the total number of pages in your submission will appear on the bottom of each page (e.g., Page 1 of 7, Page 2 of 7, etc.). The individual page numbers will be entered to Ohio EPA's database in combination with the EPA ID and form type as a means of creating a unique record. Do not number each paper form as page 1.

## **Report Recordkeeping**

After you have finished the Report and the Certification Statement on the Site ID Form has been signed, copy the entire Report for your records. Mail the signed original to Ohio EPA's Central Office.

*To send via U.S. Postal Service:*

Ohio EPA- DERR

PO Box 1049

Columbus, OH 43216-1049

*To send via overnight courier:*

Ohio EPA- DERR

50 W Town St, Ste 700

Columbus, OH 43215

You are required to keep a copy of the Report on file for a minimum of three years. EPA personnel will request that you produce manifests and report copies for their review during an inspection. Another reason to keep a copy is for reference purposes while answering questions that Ohio EPA staff might have about possible errors.

## **Amendments**

If you discover an error after the Report has been submitted, you can send an amendment. There are two general types of amendments: 1) addition of new pages; and 2) corrections to previously reported data, usually to amend waste amounts or codes. If you have submitted a paper report and need to make either of these changes, please use the following instructions for amendments. Send a brief cover letter (either by e-mail or US Mail) that explains what you are submitting with the new/corrected page attached. It is not necessary to send a copy of the entire report because the amendment will be filed with the original at Ohio EPA. Give the new page a unique page number that was not used in the original submittal; the sequence is not critical. For corrections, make a copy of the original, strike out the old value, and write in the replacement value with colored ink.

Amendments to eDRUMS electronic reports can usually be handled by sending the information via e-mail. If corrections are extensive contact Ohio EPA DERR report support staff to request putting the report back into Edit mode. This will enable you to correct the report yourself.

## **Electronic Reporting**

Web-based Hazardous Waste Report software ("eDRUMS") became available via Ohio EPA's eBusiness Center in 2009. For more information, go to the FAQ tab and/or the Training

Resources section on the [Hazardous Waste Report web page](#).

There are numerous advantages to reporting electronically:

- It's quicker to complete than paper forms.
- Built-in data validation and quality checks will minimize errors and correspondingly, Ohio EPA's potential need to contact you about errors/omissions.
- There is no software to download and install. The report application can be accessed via any computer with Chrome or the Microsoft Edge web browser.
- You will be able to copy a past report and use it as the starting point for a new report, saving you time if your waste streams are fairly consistent (even if you did not file your report electronically before).
- The receiving facility and transporter EPAID numbers are pre-populated in a pick list. The OI Form is automatically populated with the receiving facilities entered on GM Forms. This eliminates typographical errors and saves data entry time.
- Your information is secure. Only those authorized by the Responsible Official will have the ability to view, edit and save information prior to submittal to Ohio EPA.
- The report certifier will receive an immediate e-mail once the report has been submitted and certified as final. There is no uncertainty about whether it has been received at Ohio EPA.

Facilities that wish to import data can do so by creating ASCII text files that follow the specifications detailed in the [Ohio EPA File Specification Guide for Hazardous Waste Reports](#) which can be found on the Hazardous Waste Report Web page.

The Responsible Official (RO) or their authorized representative (i.e., Delegated RO, or DRO) is the person who can sign a report, either electronically using their PIN or on paper. The RO or DRO starts the process of enabling electronic reporting for the facility. The definition of who can be an RO or authorized representative for the RCRA program is contained in OAC rule 3745-50-42.

Once the RO or DRO has a PIN, they can submit an eBusiness Center service request to ask DERR to associate them with a specific facility. After this request has been approved, the RO or DRO may delegate report preparation duties for a specific facility to another eBusiness Center user. Only the RO or DRO needs a PIN; report preparers simply need an eBusiness Center account and the delegation of the Preparer role by a RO or DRO. Consultants can be designated as preparers. There is no charge for establishing an eBusiness Center account.



The eBusiness Center PIN uniquely identifies the individual to whom it is assigned and can be used for all regulatory programs that use the eBusiness Center for electronic submissions. If the RO or DRO already has a PIN for water or air data submissions, there is no need to obtain another. The PIN cannot be shared with other people and must be kept confidential.

Some of you may already be familiar with the eBusiness Center (eBiz) from filing reports with the air and water programs. As of 11/06/2020, users must first go to the OH|ID portal and create an account there before accessing eBiz. See the help materials at the bottom of the [Hazardous Waste Report web page](#).

For more information on how to get started in eDRUMS and how to complete a Report electronically, see the Training Resources section at the bottom of the [Hazardous Waste Report web page](#).

### **Trade Secret Claims**

Ohio EPA receives confidentiality requests from commercial TSD facilities who wished to protect the customer identification information on their waste receipt reports. The data fields that EPA withhold from public disclosure pending approval of the TSD facility's "trade secret" claim are the customer's name, EPA ID, street address, city, and zip code. However, the waste identification details are public information. Both a full copy and a public copy of the report must be submitted. Please reach out to the Division of Environmental Response and Revitalization for more information.

## WHEN AND WHERE TO FILE

**Hazardous Waste Reports are due by March 1st.** If March 1st falls on a weekend, the report is due the following Monday. No extension to this deadline will be granted under any circumstances. You may want to send your reports via certified mail as confirmation that they were received. File the returned green card with your report copy.

Report originals should be mailed to:

Ohio EPA - DERR  
Hazardous Waste Information Management Section  
P.O. Box 1049  
Columbus, OH 43216-1049

For courier deliveries, use the street location address:

Ohio EPA - DERR  
Hazardous Waste Information Management Section  
Lazarus Government Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

**NOTE:** Do not mail your Right-To-Know Report and Hazardous Waste Report in the same envelope because these programs are not conducted by the same division of Ohio EPA. Hazardous Waste Reports sent to Right-To-Know may not be forwarded properly to DERR and your site may incorrectly appear to be out of compliance. Also, do not mail reports to the Ohio EPA district offices because the management of the Hazardous Waste Report program is done at the Central Office.

## REPORT SUBMISSION CHECKLIST

Before mailing your report submission, please review the following checklist:

- Has the certification statement on the Site ID Form been signed and dated?
- Does the Hazardous Waste Generator Status indicator in Section 9 Box A Section 1 of the Site ID Form correctly reflect the facility's overall waste generation for the present and foreseeable future?

- Does the Hazardous Waste Report Generator Status indicator in Section 9 Box A Section 2 of the Site ID Form correctly reflect the waste generation activities that took place in the reporting year?
- Are the report pages numbered consecutively, and does each page have a unique number?
- If you shipped hazardous waste, did you fill out an OI Form? There should be one listing for each initial receiving facility and transporter, by EPA ID number.
- Have all hazardous wastes generated or managed at this location been accounted for? A generator or on-site TSD facility should have one Site ID Form and one or more GM and OI Forms. A facility that receives waste from off-site should have these same forms as well as WR and PS Forms.
- If this facility receives waste from off-site, have all customers been accounted for on WR Forms? And is there a PS Form for each TDR system type code listed on the WRs?
- Did you proofread the report after it was typed? Many errors are caused by inability of the typist to read your handwriting!
- Have you made a copy of the report for your records? You are required to maintain this copy for a minimum of three years.
- If the page is a two-sided form, was it copied correctly? Make sure the back of the page is not blank.
- Have you provided information in the Comment section to explain any special circumstances?

# **INSTRUCTIONS - RCRA SUBTITLE C SITE IDENTIFICATION (SITE ID) FORM**

## **WHO MUST SUBMIT THIS FORM**

All sites required to submit the Hazardous Waste Report must submit the Site Identification (Site ID) Form. The instructions below explain how to complete the Site ID Form for the Hazardous Waste Report.

## **PURPOSE OF THIS FORM**

For purposes of the Hazardous Waste Report, the Site ID Form identifies LQGs and TSD facilities engaging in hazardous waste generation and management activities for the reporting year. The form is divided into 12 sections (see list below). All sections of the form are to be completed as applicable.

## **ITEM-BY-ITEM INSTRUCTIONS**

### **Section 1: Reason for Submittal**

Place an "X" in the appropriate box to indicate this form is submitted "As a component of the Hazardous Waste Report". Enter the calendar year the report covers in the space provided.

**As a component of the Hazardous Waste Report for the year \_\_\_\_\_.**

### **Section 2: Site EPA ID Number**

Provide the 12-character EPA Identification Number for this site.

### **Sections 3 and 4: Site Name and Location**

Provide the legal name of your site and a complete location address. Give the public or commercial name of your site (i.e., the full name that commonly appears on invoices, signs, or other business documents). Please note that the address you give for Section 4, Site Location, must be a physical address, not a post office box or route number.

### **Section 5: Site Land Type**

Place an "X" in the box that best describes the land type of your site. If the Land Type is Municipal but also qualifies as Indian, County, or District, choose that type instead of Municipal.

### **Section 6: North American Industry Classification System (NAICS) Code(s)**

At a minimum, Box A of this section must be completed with the primary NAICS code for the site. Completing Boxes B-D is not mandatory but is recommended if more than one code applies. Referencing the most recent NAICS codes at the [U.S. Census Bureau's Web site](https://www.census.gov/naics/), report the 6-digit code (i.e., most specific description) available for your business; or use the 5-digit code. Do not enter any codes of four (4) digits or less because they are not as specific.

- BOX A** Provide the 5 or 6-digit 2022 North American Industry Classification System (NAICS) code that **best** describes the primary products or services provided by your site.
- BOXES B-D** List other NAICS codes that describe the products and services provided by your site.

### Section 7: Site Contact Person

Enter the name, title, business telephone number, e-mail, fax number, and mailing address of the person who should be contacted regarding the information submitted in the Site ID Form and the Hazardous Waste Report. E-mail address and fax number are optional, but they provide other means by which Ohio EPA can communicate with you. If the contact person's mailing address is the same as the facility location, you can simply write "same as location" in the Street or P.O. Box entry.

### Section 8: Legal Owner and Operator of the Site

This section should be used to indicate all owners and operators of this site. The comments section or additional sheets can be used if there are multiple owners/operators to report. If an additional owner has been added or a new owner has replaced the previous owner since the site's most recent notification, provide information on the new owner(s).

**Name of Site's Legal Owner:** Provide the name of your site's legal owner(s). This includes owner(s) of the building(s) and land. Please review these definitions:

Owner: The person who owns a RCRA site or part of a RCRA site. Note: This includes the owner(s) of the building(s) and/or land. This may be an individual, company, or business name. See Person.

Person: An individual, trust, firm, joint stock company, Federal Agency, corporation, (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body.

Date Became an Owner: Indicate the year, month, and day on which the above person or entity became the owner of your site. If you are unsure of the exact date, please make an educated guess.

Owner Type: Place an "X" in the box that best describes the owner type. If the Owner Type is Municipal but also qualifies as Indian, County, or District, choose that type instead of Municipal.

Owner Address, Phone Number and Email: Enter the owner's address, including the street or P.O. Box, city, state, country, and zip code. If the owner address is the same as the site location, you can write "same as location" in the street box and leave the other address boxes blank. Enter the owner phone number and email.

**Name of Site's Operator:** Provide the name and address of your site's operator. If the operator is the same as the owner, you may write "same as owner" and leave the other boxes blank. Please review these definitions:

Operator – The person responsible for the overall operation of a RCRA site. Note: This is the legal entity which controls the RCRA site operation rather than the plant or site manager. This is usually a company or business name but may be an individual. See Person.

Person – An individual, trust, firm, joint stock company, Federal Agency, corporation, (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body.

Date Became an Operator: Indicate the year, month, and day on which the above person became the operator of your site. If you are unsure of the exact date, please make an educated guess.

Operator Type: Place an "X" in the box that best describes the operator type. If the Operator Type is Municipal but also qualifies as Indian, County, or District, choose that type instead of Municipal.

Operator Address, Phone Number and Email: Enter the operator's address, including the street or P.O. Box, city, state, country, and zip code. If the operator address is the same as the site location, you can write "same as location" in the street box and leave the other address boxes blank. Enter the operator phone number and email.

## **Section 9: Type of Regulated Waste Activity**

You must complete all of Section 9 as applicable to the regulated waste activities conducted at the site. A checked box means your site is currently conducting the activity. An unchecked box means your site does not conduct or no longer conducts the activity.

If you are currently not an LQG and/or TSD facility but are filing because you were a LQG and/or TSD facility during the reporting year, check the box in A.1 that indicates the site's

generator status at the current time and in A.2, mark the generator status that was appropriate for the waste activities included in the calendar year covered by the report. Include comments about your situation in the Comments section of the Site ID Form. This enables Ohio EPA to distinguish between sites that have one-time or short-term Hazardous Waste Report submittals versus sites that regularly file.

Section A Item 1: Generator of Hazardous Waste: If the site generates a hazardous waste that is listed in OAC rules 3745-51-31 through 3745-51-33 or is identified by one or more hazardous waste characteristic(s) contained in OAC rules 3745-51-21 through 3745-51-24, place an "X" in the appropriate box for the quantity of non-acutely hazardous waste that is generated per calendar month. Do not mark any of the boxes in Item 1 if the site is not currently a generator.

- A. Large Quantity Generator (LQG)
- B. Small Quantity Generator (SQG)
- C. Very Small Quantity Generator (VSQG)

In addition, mark an "X" in the following appropriate box(es) to indicate other generator activities occurring at this site. (Check all boxes that apply.)

- D. Temporary Generator: Mark an "X" in the box if the site is normally not a generator of hazardous waste but is currently generating hazardous waste only as the result of a one-time, non-recurring, temporary event that is not related to normal production processes. In other words, short-term temporary generators produce hazardous waste from a particular activity for a limited time and then cease being a generator. If you mark "X", you must provide an explanation of your short-term or one-time generation in the comments section. **If the temporary generation is finished, do not mark the Temporary box; instead, provide text in the comments section about the event.**
- E. Episodic Generator: You cannot notify of an Episodic Event during the submittal of a Biennial Report.

Section A Item 2: Hazardous Waste Report Generator Status: Select the site's generator status as applicable to the calendar year for which the report is being submitted. It may or may not be the same as the status in Item 1.

Section A Item 3: Transporter of Hazardous Waste: Place an "X" in all boxes that apply.

- A. Transporter: You transport hazardous waste within the United States. Ohio's regulations for hazardous waste transporters are found in OAC Chapter 3745-53.

- B. Transfer Facility (at your site): You are a hazardous waste transfer facility, at your site, if you hold manifested hazardous waste(s) at your site for a period of ten (10) days or less while the waste is in transit. Ohio's regulations for hazardous waste transfer facilities are found in OAC rule 3745-53-12.

Section A Item 4: Treater, Storer, or Disposer of Hazardous Waste (at your site): If the site treats, stores, or disposes of regulated hazardous waste, place an "X" in this box. A RCRA Hazardous Waste Part B permit is required for this activity. Ohio's regulations for owners or operators of hazardous waste sites are found in OAC Chapters 3745-54, 55, 56, 57, 58, 65, 66, 67, 68, 69, 218, and 248.

Section A Item 5: Recycler of Hazardous Waste: If the site recycles regulated hazardous wastes (recyclable materials) that is received from off-site, place an "X" in this box. Ohio's regulations for owners or operators of sites that recycle hazardous waste are found in OAC rule 3745-51-06. A hazardous waste permit may be required for this activity. You also may be subject to other Federal and State regulations.

Section A Item 6: Exempt Boiler and/or Industrial Furnace

- A. Small Quantity On-Site Burner Exemption: If the site burns small quantities of hazardous waste in an on-site boiler or industrial furnace in accordance with the conditions in OAC rule 3745-266-108, place an "X" in the box to indicate that the site qualifies for the Small Quantity On-Site Burner Exemption.
- B. Smelting, Melting, and Refining Furnace Exemption: If the site burns hazardous wastes in a smelting, melting, or refining furnace solely for metals recovery, as described in OAC rule 3745-266-100(D), or to recover economically significant amounts of precious metals, as described in OAC rule 3745-266-100(G), or if you process hazardous wastes in a lead recovery furnace to recover lead, as described in OAC rule 3745-266-100(H), mark an "X" in the box to indicate that the site qualifies for the Smelting, Melting and Refining Furnace Exemption.

Section A Item 7: Underground Injection Control: If the site generates, treats, stores, or disposes of hazardous waste and places the waste or its residuals into an underground injection well located at your site, place an "X" in the box. Ohio's regulations for owners or operators of underground injection wells are found in OAC rule 3745-34-09.

Section A Item 8: Receives Hazardous Waste Form Off-site (at your site): If you received hazardous waste from another site, whether this waste was received as a commercial



transaction or waste received from a restricted group of off-site generators, place an “X” in the box.

Section A Item 9: United States Importer of Hazardous Waste: If the site imports hazardous waste from a foreign country into the United States, place an “X” in the box. Refer to OAC rule [3745-52-80](#) for additional information.

Section A Item 10: Recognized Trader: Place an “X” in the boxes that apply if you are a recognized trader, defined in OAC rule 3745-50-10(R)(1) as a person domiciled in the United States, who acts to arrange and facilitate transboundary movements of wastes destined for recovery or disposal operations, either by purchasing from and subsequently selling to United States and foreign facilities, or by acting under arrangements with a United States waste facility to arrange for the export or import of the waste. Mark all that apply, importer and or exporter.

Section A Item 11: Importer/Exporter of Spent Lead Acid Batteries (SLABs): Place an “X” in the boxes that apply if you are an importer or exporter of spent lead-acid batteries (SLABs) being managed domestically under OAC rule 3745-266-80(A) (6) - (10). Mark all that apply, importer and or exporter.

Section A Item 12: Electronic Manifest Broker: Place an “X” in the box if you are a person as defined in 40 CFR 260.10 that elects to use the electronic manifest system to obtain, complete and transmit an electronic manifest format supplied by the EPA electronic manifest system under a contractual relationship with a hazardous waste generator.

Section A Item 13: LQG Consolidation of VSQG Hazardous Waste: Place an “X” in the box if you are an LQG that receives and consolidates hazardous wastes from VSQGs who are under the control of the same “person” as defined in OAC 3745-50-10.

You must complete the Addendum to the Site Identification Form for LQG Consolidation of Hazardous Waste from VSQGs providing all of the following information for each VSQG you are consolidating waste from:

- EPA Identification number (if applicable)
- The site name
- The site address
- The facility contact name
- The facility contact phone number

**Note:** Each time that you fill out a Site ID Form, the LQG Consolidation Addendum must be provided with a current list of VSQG(s) as long as this activity continues. This includes when submitting the Biennial Hazardous Waste Report. There is a

specific GM Form Source Code G51 to be used for reporting VSQG hazardous waste received from off-site, so records should be kept in a way that makes it possible for you to report it separately from LQG waste generated on-site.

See item by item instructions for this addendum on page 32.

Section A Item 14: LQG Site Closure for a Central Accumulation Area (CAA) (notification is optional) or Entire Facility (notification is required): Complete applicable boxes a-d if you are/were an LQG who is required to notify Ohio EPA no later than 30 days prior to closing your facility, an LQG who must notify Ohio EPA within 90 days after closing your facility, or an LQG who is closing a Central Accumulation area, in which case notification is optional.

Applicability Notes:

- If at any time on or after the 10/05/2020 effective date of OAC rule 3745-52-17 (Conditions for exemption for LQGs that accumulate hazardous waste), a generator meets the definition of an LQG and accumulates hazardous waste on-site in any units subject to closure performance standards, the generator is subject to the closure notification requirements of OAC rule 3745-52-17(A)(8)(c).
- Former LQGs that are no longer LQGs as of 10/05/2020 are still subject to the applicable closure standards for the hazardous waste management units which accumulated hazardous waste.

Information about generator closures can be found in Section 1.10 of the Closure Plan Review Guidance for RCRA Facilities located [here](#). Overall, you will submit a minimum of two notifications as the facility progresses through the closure process.

A. Mark an “X” in either the Central Accumulation Area box or the Entire Facility box designating which your facility is closing.

B. List the date your facility expects to close the CAA or Entire Facility in mm/dd/yyyy format

C. If the expected date has changed, list the new date your facility plans to close either a CAA or Entire Facility in mm/dd/yyyy format

D. List the date your facility closed a CAA or the Entire Facility in mm/dd/yyyy format

1. Place an “X” in the box if your facility is in compliance with the closure performance standards outlined in OAC 3745-52-17(A)(8)(c)

2. Place an “X” in the box if your facility is not in compliance with the closure performance standards outlined in OAC 3745-52-17(A)(8)(c)

## **Section 10: Waste Codes for Federally Regulated Hazardous Wastes**

*Sites involved in hazardous waste activities should complete this section, with the exception of hazardous waste transporters.*

If you handle hazardous wastes at your site that are described in OAC Chapter 3745-51, enter the appropriate 4-digit code(s) in alphanumeric order in the box(es) provided. A list of waste codes is available through a link on [the Hazardous Waste Report Web site](#). Waste code reporting on the Site ID Form is required for sites with any of the following activities: Generator, TSD facility, Recycler, Exempt Boiler and/or Industrial Furnace, or Reverse Distributor.

If you are a Healthcare Facility, and have notified as such, do not list any hazardous waste codes that pertain to hazardous waste pharmaceuticals. This is because like Universal Waste, hazardous waste pharmaceuticals do not count toward determination of the site’s generator status if they have notified as a Healthcare Facility. Do not report the waste code PHRM on any GM Forms unless your site is a receiver who is transshipping hazardous waste pharmaceuticals to another receiver (i.e., Source Code G61, Form Code W005).

However, Reverse Distributors must report all applicable hazardous waste codes for pharmaceuticals and not substitute PHRM.

## **Section 11: Universal Waste Activities**

Refer to OAC Chapter 3745-273 for Ohio’s regulations covering universal waste. *Only Handlers of Universal Waste or Destination Facilities should complete this section.*

In Ohio there are federally defined Universal Wastes as well as state-defined. To obtain more information about universal waste requirements, call the Hazardous Waste Compliance Assurance Section at (614) 644-2924 or visit Ohio EPA’s [Universal Waste web page](#).

Section 1 Item A: Small Quantity Handler of Universal Waste (SQHUW): The site is a SQHUW if it accumulates a total of less than 5,000 kg (11,000 lbs) of any universal wastes (calculated collectively) at any time. Notification to the Ohio EPA of this activity is optional.

Section 1 Item B: Large Quantity Handler of Universal Waste (LQHUW): The site is a LQHUW if it accumulates a total of 5,000 kg (11,000 lbs) or more of any universal wastes (calculated collectively) at any time. Mark an “X” in the appropriate box(es) to indicate the type(s) of universal wastes the site manages.

**Note:** Ohio EPA has amended the existing UW Rules in accordance with U.S. EPA's addition of Aerosol Containers to the Universal Waste Rules. Aerosol cans are no longer an Ohio-Specific universal waste, but they are still eligible to be managed as a universal waste under Ohio Administrative Code (OAC) rule 3745-273-06.

Section 2: Destination Facility: Mark an "X" in the box if you treat, dispose of, or recycle universal wastes on-site. A hazardous waste permit is required if you treat or dispose of universal wastes; a permit may be required if you recycle universal wastes.

## **Section 12: Used Oil Activities**

Mark an "X" in the appropriate box(es) to indicate which used oil management activities are taking place at this site. Ohio's regulations for used oil management are found in OAC Chapter 3745-279.

1. Used Oil Transporter: If "Yes" place an "X" in all that apply. The regulations for used oil transporters and transfer facilities are found in OAC rules 3745-279-40 through 3745-279-47.
  - A. Transporter: You transport used oil within the United States.
  - B. Transfer Facility (at your site): You own or operate a used oil transfer facility.
2. Used Oil Processor and/or Re-Refiner: If "Yes" mark all that apply. The regulations for processors or re-refiners of used oil are found in OAC rules 3745-279-50 through 3745-279-59.
  - A. Processor: You process used oil.
  - B. Re-Refiner: You refine used oil.
3. Off-Specification Used Oil Burner: If the site burns off-specification used oil fuel, place an "X" in the box to indicate this used oil management activity.
4. Used Oil Fuel Marketer: If "Yes" mark all that apply. If either of these boxes is marked, you must also notify as a used oil transporter, used oil processor and/or re-refiner, or off-specification used oil fuel burner, unless you are a used oil generator. (Used oil generators are not required to notify.)
  - A. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burners: You are a marketer who directs shipment of off-specification used oil to off-specification used oil burners. The regulations for off-specification used oil are found in OAC rules 3745-279-70 to 3745-279-75.

- B. Marketer Who First Claims the Used Oil Meets the Specification: You are the first to claim that used oil meets the used oil specification established in OAC rule 3745-279-11.

### **Section 13: Pharmaceutical Activities**

Notification for opting into or withdrawing from the management of hazardous waste pharmaceuticals pursuant to OAC rules 3745-266-500 through 3745-266-510: These rules are mandatory for the management of hazardous waste pharmaceuticals at all healthcare facilities (except healthcare facilities that are VSQGs) and reverse distributors. LQG and SQG healthcare facilities and reverse distributors must notify Ohio EPA of these pharmaceutical activities using the Site ID Form. If a healthcare facility that is a VSQG chooses to operate under OAC rules 3745-266-500 through 3745-266-510, it also must notify using the Site ID Form.

1. If you are opting into or currently operating under OAC rules 3745-262-500 through 3745-262-510 for the management of hazardous waste pharmaceuticals place an “X” in only one of the following:
  - A. Healthcare Facility
  - B. Reverse Distributor
2. If you are withdrawing from operating under OAC rules 3745-262-500 through 3745-262-510 for the management of hazardous waste pharmaceuticals place an “X” in the box. You cannot withdraw if you didn’t previously notify Ohio EPA of opting in.

Please visit Ohio EPA’s [Hazardous Waste Pharmaceuticals webpage](#) for more information.

### **Section 14: Eligible Academic Entities with Laboratories**

Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to OAC rules 3745-52-200 through 3745-52-216: These rules are an optional alternative set of requirements for eligible academic entities with laboratories. Certain generators (i.e., eligible academic entities defined under (1) below) are eligible to operate under OAC rules 3745-52-200 through 3745-52-216 for management of their hazardous wastes in laboratories in lieu of 3745-52-15 (or 3745-52-14 for VSQGs). Eligible academic entities with laboratories that generate hazardous waste that elect to opt into 3745-52-200 through 3745-52-216, are currently operating under these rules, or subsequently withdraw must complete this section to meet the notification requirements of 3745-52-203 or 3745-52-204.

**Note:** Eligible academic entities with laboratories must complete a separate Site ID Form for each site (i.e., EPA ID number) that is managing hazardous waste under OAC rules 3745-52-

200 through 3745-52-216. All laboratories with the same EPA ID number will be regulated under these rules. If eligible academic entities with laboratories withdraw from regulation under the academic laboratory rules, all laboratories with the same EPA ID number associated with the withdrawal will be regulated under 3745-52-15 requirements (or 3745-52-14 for VSQGs).

1. Opting into or currently operating under OAC rules 3745-52-200 through 3745- 52-216 for the management of hazardous wastes in laboratories: Place an “X” in this box if you are an eligible academic entity and you elect to opt into or are currently operating under OAC rules 3745-52-200 through 3745-52-216 for the hazardous wastes generated in your laboratories. If you place an “X” in this box, you must place an “X” in at least one of the following to indicate your type of eligible academic entity. Place an “X” in all that apply:
  - A. College or University. You are an eligible college or university if you are a private or public, post-secondary, degree-granting, academic institution, that is accredited by an accrediting agency listed annually by the U.S. Department of Education.
  - B. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university: You are an eligible teaching hospital if you are a hospital that trains students to become physicians, nurses, or other health personnel and is either: (1) owned by a college or university, or (2) has a master affiliation agreement and program letter of agreement, as defined by the Accreditation Council for Graduate Medical Education, with an accredited medical program or medical school.
  - C. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university: You are an eligible non-profit institute if you are an organization that conducts research as its primary function and files as a non-profit organization under the tax code of 26 U.S.C. 501(c)(3) and is either: (1) owned by a college or university, or (2) has a formal written affiliation agreement with a college or university that establishes a relationship between institutions for the purposes of research and/or education and is signed by authorized representatives from each institution. A relationship on a project-by-project or grant-by-grant basis is not considered a formal written affiliation agreement.
2. Withdrawing from OAC rules 3745-52-200 through 3745-52-216 for the management of hazardous wastes in laboratories: Place an “X” in this box if you have previously elected to opt into OAC rules 3745-52-200 through 3745-52-216 and are now withdrawing from participation in this optional set of alternative

requirements for hazardous waste generation in laboratories. Withdrawing generators will automatically revert to regulation under 3745-52-15 requirements (or 3745-52-14 for VSQGs).

### **Section 15: Hazardous Secondary Material (HSM)**

Place an “X” in the “Yes” box if you are notifying under OAC rule 3745-50-16 that you will begin managing, are still managing, or will stop managing hazardous secondary material under OAC rules 3745-50-23, 3745-51-04(A)(23), (24), (25), or (27). Otherwise, place an “X” in the “No” box.

**NOTE:** If you mark “Yes,” you must fill out the Addendum to the Site ID Form: Notification of Hazardous Secondary Material Activity. Please refer to the item-by-item instructions on page 33 on how to complete the Addendum

### **Section 16: Comments**

Use this space as needed to provide additional information as well as any special circumstances related to the filing of the Hazardous Waste Report. Attach additional sheets if necessary.

### **Section 17: Certification**

This certification must be signed and dated by the site’s responsible official or their duly authorized representative. The name and title of the certifier should be legibly printed in the second column. [OAC Rule 3745-50-42](#) requires that all reports shall be signed by one of the following:

- A responsible corporate officer
- A general partner or the proprietor
- For public agencies, a principal executive officer or ranking elected official
- A duly authorized representative of any of the three persons listed above

The authorization of a representative should be made in writing. The representative should be an individual having responsibility for overall operation of the regulated facility or activity. If the authorization is no longer accurate because a different individual or position is responsible for the overall operation of a facility, a new authorization is required.

## **ITEM-BY-ITEM INSTRUCTIONS for the LQG CONSOLIDATION OF HAZARDOUS WASTE FROM VSQG ADDENDUM**

You must fill out this Addendum if you are an LQG taking advantage of the new provision at OAC 3745- 52-17(F) allowing you to consolidate hazardous wastes from VSQGs under the control of the same person (as defined in OAC 3745-50-10). For each VSQG that the LQG is receiving hazardous waste from, the LQG must identify the EPA Identification Number, if applicable, the name of the site, the site address, contact name, phone number, and email address.

### **Section 1: EPA ID Number**

Provide the EPA Identification Number for the VSQG whose waste you are consolidating, if applicable. A VSQG may have an EPA ID Number, because it may have been an SQG or LQG at one time, or for another reason. If the VSQG does not have an EPA ID Number, leave this blank.

### **Section 2: Site Name**

Provide the legal name of the VSQG.

### **Sections 3-6: Site Location**

Provide the complete location address for the VSQG. Please note that the address must be a physical address, not a post office box or route number.

### **Sections 7-9: Contact Information**

Enter the telephone number, name of the individual who should be contacted for information about the VSQG, and their email address.



## **ITEM-BY-ITEM INSTRUCTIONS for the HAZARDOUS SECONDARY MATERIAL (HSM) ADDENDUM**

You must fill out this Addendum if you are or will be managing excluded HSM in compliance with OAC rules 3745-50-23, 3745-51-04(A)(23), (24), (25), or (27) or have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

**NOTE:** You must submit a completed Site ID Form, including this Addendum, prior to operating under the exclusion(s) and by March 1 of each even-numbered year thereafter using the Site ID Form as pursuant to OAC rule 3745-50-16. Persons who must satisfy this notification requirement can submit this information at the same time as their Biennial Hazardous Waste Report (which is also due by March 1 of each even numbered year).

If you stop managing hazardous secondary material in accordance with the exclusion(s) and do not expect to manage any amount of hazardous secondary material under the exclusion(s) for at least one year, you must also submit a completed Site ID Form, including this Addendum, within thirty (30) days pursuant to OAC rule 3745-50-16.

### **Section 1: Reason for Notification**

Option 1: Facility will begin managing excluded hazardous secondary material as of (mm/dd/yyyy). Place an "X" in the box if you are notifying that you will begin managing HSM under the exclusion(s).

- i. Facilities must notify prior to operating under the exclusion(s)
- ii. If you are placing an "X" in this box, list the date when you will begin managing HSM under OAC rules 3745-50-23, 3745-51-04(A)(23), (24), (25), or (27).

Option 2: Facility is still managing excluded hazardous secondary material/ re-notifying as required by March 1st of each even numbered year. Place an "X" in the box if you are re-notifying that you are still managing HSM under the exclusion(s).

Option 3: Facility has stopped managing excluded hazardous secondary material as of (mm/dd/yyyy) and is notifying as required. Place an "X" in the box if you are notifying that you have stopped managing hazardous secondary material under the exclusion(s) and do not expect to manage any amount of hazardous secondary material for at least one year (pursuant to OAC rule 3745-50-16(b)).

- i. If you are placing an "X" in this box, list the date when you have stopped managing HSM.
- ii. Facilities must notify within 30 days of when they stopped managing hazardous secondary material. You are considered to have stopped

managing hazardous secondary material if: (1) you stop managing hazardous secondary material completely (e.g., you cease operations); (2) you choose to manage the hazardous secondary material as hazardous waste; (3) you undergo closure and request release from financial assurance per OAC rules 3745-51-143(h) or 3745-55- 43; or (4) you temporarily suspend management of hazardous secondary material for at least one year.

- iii. Only place an “X” in this box if you have stopped managing all hazardous secondary material under the exclusion(s). For example, if your facility only stopped managing one hazardous secondary material, but continued to manage another hazardous secondary material, you would leave this box blank since your facility continues to manage some amount of hazardous secondary material
- iv. If you submit a notification that you have stopped managing hazardous secondary material, you do not need to re-notify (unless you choose to manage hazardous secondary material again, in which case you would have to submit a notification prior to managing). After submitting a stop notification, you can leave the Addendum blank for subsequent submissions, including any subsequent Hazardous Waste Report submissions

## **Section 2: Description of Excluded Hazardous Secondary Material (HSM) Activity**

In the table provided on the Addendum to the Site Identification Form, list your appropriate facility code, each waste code for the hazardous secondary material you manage, the estimated and actual quantities, in short tons, for each hazardous secondary material, and the appropriate land-based code for how you manage the hazardous secondary material. Do not include any information regarding your hazardous wastes in this section. See examples below on how to answer this question.

### **Item A: Facility Code**

Using the nationally defined Facility Codes, enter the appropriate 2-digit code(s) that correctly describes your facility. If more than one code applies to your facility, enter each 2-digit code on a separate row. Each hazardous secondary material should be reported by facility code. Facility codes describe the specific regulation a facility uses to manage its hazardous secondary material (HSM) and the type of activity the facility performs under the regulation (e.g., generator, reclaimer). Review the groups and pick the appropriate code. If more than one facility code applies to you, enter each code on a separate row under Item 2 of the Addendum to the Site Identification Form.

<b>Under Generator Exclusion (OAC rule 3745-51-04(a)(23))</b>	
<u>Code</u>	<u>Facility Code Description</u>
01	HSM Generator reclaiming HSM “on-site”: This code applies if you generate and reclaim hazardous secondary material at your generating facility.
02	HSM Generator transferring HSM to reclaimer within the “same company”: This code applies if you generate hazardous secondary material and send the material for reclamation to a different facility that is either controlled by you or controlled by the same person that controls your generating facility.
03	Reclaimer receiving HSM from HSM generator within the “same company”: This code applies if you receive and reclaim hazardous secondary material from a different facility that either controls you or is controlled by the same person that controls you.
04	Tolling Contractor reclaiming HSM pursuant to a tolling contract: This code applies if you are a tolling contractor that reclaims hazardous secondary material pursuant to a written contract with a toll manufacturer.
05	Toll Manufacturer managing HSM pursuant to a tolling contract: This code applies if you generate and send hazardous secondary material for reclamation to a tolling contractor pursuant to a written contract.
<b>Transfer-Based Exclusion (OAC rule 3745-51-04(a)(24))</b>	
<u>Code</u>	<u>Facility Code Description</u>
06	HSM Generator transferring HSM off-site to a domestic reclamation facility: This code applies if you generate and send hazardous secondary material for reclamation to an off-site domestic reclamation facility.
07	Reclaimer receiving HSM from off-site: This code applies if you reclaim hazardous secondary material received from an off-site hazardous secondary material generator or other facility and you certify that you have financial assurance per OAC rule 3745-50-16.
08	Intermediate facility receiving HSM from off-site: This code applies if you receive hazardous secondary material from an off-site hazardous secondary material generator or another facility, you store it for more than ten days, and you certify that you have financial assurance per OAC rule 3745-50-16. This code does not apply if you generate or reclaim the hazardous secondary material.

<b>Imports and Exports (OAC rules 3745-51-04(a)(24) and (25))</b>	
<u>Code</u>	<u>Facility Code Description</u>
09	HSM Generator exporting HSM to a foreign entity for reclamation: This code applies if you generate and plan to send hazardous secondary material for reclamation to a foreign entity for reclamation and will meet the notice and consent procedures in OAC rule 3745-50-16.
10	HSM Generator importing HSM from a foreign entity to send to another U.S. facility for reclamation: This code applies if you import hazardous secondary material from a foreign entity and send the material to a different U.S. reclamation facility.
11	HSM Generator importing HSM from a foreign entity for reclamation: This code applies if you import hazardous secondary material from a foreign entity and reclaim the material at your facility.
<b>Non-waste Determinations and Solid Waste Variances (OAC rule 3745-50-23)</b>	
<u>Code</u>	<u>Facility Code Description</u>
14	Variance for Materials that are Accumulated Speculatively: This code applies if you operate under an approved variance from EPA or your State for materials that are accumulated speculatively without sufficient amounts being recycled (see OAC rule 3745-50-24).
15	Variance for Materials that are Reclaimed and then Reused within the Original Production Process: This code applies if you operate under an approved variance from EPA or your State for materials that are reclaimed and then reused as feedstock within the original production process in which the materials were generated (see OAC rule 3745-50-24(b)).
16	Variance for Materials that are Partially Reclaimed: This code applies if you operate under an approved variance from EPA or your State for materials that have been partially-reclaimed but must be reclaimed further before recovery is completed if the partial reclamation has produced a commodity-like material (see OAC rule 3745-50-24(c)).
17	[Reserved]
18	[Reserved]
19	[Reserved]
20	Non-waste determination for HSM reclaimed in a continuous industrial process: This code applies if you operate under an approved non-waste determination from EPA or your State for hazardous secondary material which is reclaimed in a continuous industrial process (see OAC rule 3745-50-15(b))
21	Non-waste determination for HSM that are indistinguishable from a product or intermediate: This code applies if you operate under an approved non-waste determination from EPA or your State for hazardous secondary materials which is

	indistinguishable in all relevant aspects from a product or intermediate (see OAC rule 3745-50-15(c)).
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Item B: Waste Codes(s) for HSM

Use the box provided to enter the appropriate 4-digit hazardous waste code(s) that would apply to your hazardous secondary material if you managed it as hazardous waste (i.e., the waste code(s) that would apply if you did not manage your material in accordance with OAC rules 3745-50-23, 3745-51-04(A)(23), (24), (25), or (27).

Item C: Estimate Short Tons of Excluded HSM to be Managed Annually

In the box provided, enter your estimated quantity (using short tons) of hazardous secondary material you expect to manage annually. Convert all physical quantities (e.g., gallons, cubic yards, kilograms, metric tons, etc.) to short tons (1 short ton = 2,000 pounds) and round to the nearest ton (no decimals).

**NOTE:** Your estimated quantity should be for the entire amount of hazardous secondary material to be reclaimed NOT just the quantity of constituent or product reclaimed.

Item D: Actual Short Tons of Excluded HSM Manages During the Most Recent Odd-Numbered Year

Report the quantity (using short tons) of each hazardous secondary material you actually managed during the most recent odd-numbered year. For example, if you are submitting this notification on February 20, 2018, enter the amount you actually managed during 2017 (i.e., the quantity you managed from January 1, 2017 to December 31, 2017). Convert all physical quantities (e.g., gallons, cubic yards, kilograms, metric tons, etc.) to short tons (1 short ton = 2,000 pounds) and round to the nearest ton (no decimals). If this is your initial notification, enter "0."

**NOTE:** Your actual quantity should be for the entire amount of hazardous secondary material that was send for reclamation NOT just the quantity of constituent or product reclaimed.

#### Item E: Land-based Unit Code

Using the nationally defined Land-based Unit Codes, enter in the 2-digit code that best describes the land-based unit you use or will use to manage the hazardous secondary material. If you do not use any land-based units, enter “NA.” If you use the code “OT” (Other), please describe your land-based unit in the comments section. If more than one land-based unit code applies to a hazardous secondary material, list is separately using another row.

<u>Code</u>	<u>Land-based Unit Code Description</u>
NA	Do not use land-based units to manage hazardous secondary material.
SI	Use surface impoundment(s) to manage hazardous secondary material. A surface impoundment is a natural topographic depression, man-made excavation or diked area formed primarily of earthen materials (although it may be lined with man-made materials), which is designed to hold an accumulation of liquid hazardous secondary materials or materials containing free liquids and which is not an injection well.
PL	Use pile(s) to manage hazardous secondary material. Pile means any non-containerized accumulation of solid, non-flowing hazardous secondary material that is used for storage and is not a containment building.
OT	Use other land-based unit(s) to manage hazardous secondary material.

# **INSTRUCTIONS - GM FORM - WASTE GENERATION AND MANAGEMENT**

## **WHO MUST SUBMIT THIS FORM?**

A site required to file the Hazardous Waste Report must submit at least one GM Form if the site generated RCRA hazardous waste that, in the reporting year, was accumulated on-site; managed on-site in a treatment, storage, or disposal unit; and/or shipped off-site for management, consistent with the criteria below. See WASTES TO BE REPORTED below, for specific instructions on generated RCRA hazardous wastes that should be reported on a GM Form. See WASTES NOT TO BE REPORTED below, for any exclusions or exemptions from GM Form reporting.

## **PURPOSE OF THIS FORM**

The GM Form is for reporting on-site hazardous waste generation and management. The GM Form is divided into four sections that document 1) the source, characteristics, and quantity of hazardous waste generated; 2) the quantity of hazardous waste managed on-site along with the management method used; 3) the quantity of hazardous waste shipped off-site for treatment, disposal, or recycling along with the off-site management method used; and 4) the quantity of hazardous waste remaining on-site as of December 31 in a permitted storage area or an inactive disposal unit that is undergoing closure.

## **HOW TO FILL OUT THIS FORM**

Before attempting to complete the GM Form, it is highly suggested that you review all of the site's waste generation and management activities on a start-to-finish waste stream basis. Each GM Form page is for a specific waste stream and requires an overview of how it was generated and/or managed; shipment details are only one section of the form. Reach out to the facility that accepted your waste shipment(s) if you do not know how the waste was managed after it left your site. The generator is ultimately responsible for assuring that their waste is managed properly, even after it leaves the site, according to the "cradle to grave" concept under which RCRA operates.

Write in the site's EPA ID number at the top right portion of the form. Make at least one photocopy of the blank form for each RCRA hazardous waste stream the site generates, plus a few extras. If you have manifests with more than one type of waste stream listed, make photocopies and organize information about each waste into a separate set of documents.

## WASTES TO BE REPORTED

In general, each generated RCRA hazardous waste that is used to determine the site's generator status should be reported on the GM Form.

Hazardous waste must be reported if it was:

- Generated and accumulated on-site and subsequently managed on-site or shipped off-site in the reporting year; or
- Generated and accumulated on-site in the reporting year but not managed on-site or shipped off-site until after the reporting year; or
- Generated and accumulated on-site prior to the reporting year but either managed on-site or shipped off-site in the reporting year.

Examples of RCRA hazardous wastes to be reported include those that were:

- Generated on-site from a production process, service activity, or routine cleanup;
- Generated from equipment decommissioning, spill cleanup, or remedial cleanup activity;
- Shipped off-site, including hazardous waste that was received from off-site (reported on the Waste Received from Off-site Form [WR Form]) and subsequently shipped off-site without being treated or recycled on-site;
- Removed from on-site storage;
- Derived from the management of non-hazardous waste; or
- Derived from the on-site treatment (including reclamation), disposal, or recycling of previously existing hazardous waste (as a residual).
- Radioactive wastes mixed with RCRA hazardous waste. Be sure to mark the Mixed Waste Generator box on the Site ID Form in Item 9.A.1.f.

## WASTES NOT TO BE REPORTED

Materials and wastes identified at OAC rules [3745-51-04\(A\) and \(B\)](#) and [3745-52-13\(C\)](#) **should not be reported on the GM Form**. OAC rules [3745-51-04\(A\) and \(B\)](#) identify materials and solid wastes that do not qualify as solid or hazardous wastes, respectively. OAC rule [3745-52-13\(C\)](#) identifies hazardous wastes that should not be included in a site's generator status determination, even if these hazardous wastes were generated at the site.

Following are the materials and wastes addressed under [OAC rules 3745-51-04\(A\) and \(B\)](#) and [3745-52-13\(C\)](#), which should not be reported on the GM Form:

- Federal or Ohio-defined Universal wastes managed under [OAC rule 3745-51-09](#) and OAC Chapter 3745-273. [[OAC rule 3745-52-13\(C\)\(6\)](#)]. Universal waste doesn't count toward the determination of generator size and therefore is not reportable by the



generator. Any hazardous waste residues generated from these management units, however, must be reported on the GM Form.

- Wastes managed immediately upon generation only in on-site elementary neutralization units, wastewater treatment units, or totally enclosed treatment facilities as defined in OAC Chapter 3745-50. [[OAC rule 3745-52-13\(C\)\(2\)](#)] Any hazardous waste residues generated from these units, however, must be reported on the GM Form.
- Materials that are excluded from being a solid waste, e.g., any mixture of domestic sewage and other wastes that pass through a sewer system to a publicly owned treatment works (unless they are stored or treated in regulated units prior to being discharged). [OAC rule 3745-51-04(A)]
- Solid wastes that are excluded from being hazardous waste, e.g., petroleum-contaminated media and debris that fail the test for the toxicity characteristic (waste codes D018 through D043 only) and are subject to the corrective action regulations under OAC Chapter 1301:7-9. [OAC rule 3745-51-04(B)(10)]
- Waste exempt from regulation because the waste has not exited the raw material storage or production unit yet, as specified in OAC rule 3745-51-04(C). [[OAC rule 3745-52-13\(C\)\(1\)](#)]
- Hazardous waste that has been collected as a sample(s) for the purpose of determining its characteristic or composition, as specified in OAC rule 3745-51-04(D). [[OAC rule 3745-51-05\(C\)\(1\)](#)]
- Sample(s) undergoing treatability studies, as specified in OAC rule 3745-51-04(E). [[OAC rule 3745-52-13\(C\)\(1\)](#)]
- Sample(s) undergoing treatability studies at the laboratory or testing facility, as specified in OAC rule 3745-51-04(F). [[OAC rule 3745-52-13\(C\)\(1\)](#)]
- Hazardous waste that is a specified recyclable material such as ethyl alcohol or scrap metal, as specified in OAC rule 3745-51-06(A)(3). [[OAC rule 3745-52-13\(C\)\(1\)](#)]
- A residue of hazardous waste in an empty container or in an inner liner removed from an empty container, as specified in OAC rule 3745-51-07(A)(1). [[OAC rule 3745-52-13\(C\)\(1\)](#)]
- PCB wastes regulated under the Toxic Substance Control Act, as specified in OAC rule 3745-51-08, unless mixed with a hazardous waste. [[OAC rule 3745-52-13\(C\)\(1\)](#)]
- Wastes recycled, without prior storage, only in an on-site process subject to regulation under OAC rule 3745-51-06(C)(2). [[OAC rule 3745-52-13\(C\)\(3\)](#)]
- Used oil that is recycled and is also a hazardous waste solely because it exhibits a hazardous waste characteristic and is managed under OAC Chapter 3745-279. [[OAC rule 3745-52-13\(C\)\(4\)](#)]
- Spent lead-acid batteries managed under the requirements of OAC rule 3745-266-80, which includes persons who reclaim spent lead-acid batteries that are recyclable materials; persons who generate, transport, or collect spent batteries; persons who

regenerate spent batteries; or persons who store them (other than spent batteries that are to be regenerated). [[OAC rule 3745-52-13\(C\)\(5\)](#)] Any hazardous wastes generated during battery reclamation, however, must be reported on the GM Form

- Recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these. [[OAC rule 3745-266-70](#)]
- Hazardous waste pharmaceuticals as defined in OAC rule 3745-266-500 if your facility is a Healthcare Facility and has notified as such. These wastes do not count towards your hazardous waste generator status determination as a Healthcare Facility; this exception does not apply to Reverse Distributors
- Episodic generation event wastes managed in compliance with 3745-52-230 to 233. Hazardous waste generated by a LQG outside of the 60-day episodic event(s), however, must be reported on the GM Form.

**Do not** report wastes that are defined as hazardous only by certain states and are not regulated by U.S. EPA.

## ITEM-BY-ITEM INSTRUCTIONS

### Section 1 Item A: Waste Description

Provide a concise description of the waste in a maximum of 60 characters, citing the waste type, source, and the generic chemical name or primary hazardous constituents. When describing the waste, don't be too vague ("Waste flammable liquid") or overly detailed (listing every single chemical in a lab pack). Describe the waste and how it was generated in everyday terminology; "Spent xylene and toluene from paint booth cleaning" or "Outdated chemicals from a lab clean-out" are acceptable descriptions. The codes required in boxes B-D will provide additional details about the waste and reduce the need to explain it further in Box A.

It is not necessary to include DOT manifest labeling descriptions such as "RQ", "n.o.s.", Hazard Class, or UN/NA code. EPA does not use this information.

### Section 1 Item B: EPA Hazardous Waste Codes

Enter all EPA hazardous waste codes that apply to the waste reported in Box A. A list of EPA hazardous waste codes can be found on our website at [List of RCRA Waste Codes](#). Do not include codes for materials regulated by a state agency only and not by U.S. EPA. There is space for up to 21 codes in Box B; if you have additional codes, check the More... box and record the overflow in the area provided after the Comments section. Use a columnar format with enough spaces between the codes to provide readability.

If you have notified as a Healthcare Facility, do not list any hazardous waste codes (including PHARMS or PHRM) that pertain to the facility's hazardous waste pharmaceuticals. These wastes do not count towards the facility's hazardous waste generation determination.

If your facility has notified as a Reverse Distributor, you must list the actual hazardous waste codes and not PHARMS or PHRM. All hazardous waste pharmaceuticals must be reported by Reverse Distributors.

### **Section 1 Item C: Source Code and Management Method Code**

Enter the Source Code that best describes the production, service, or waste management process that was the source associated with generation of the waste. If the hazardous waste was mixed with other non-hazardous materials, report the Source Code for only the hazardous waste portion. A list of source codes can be found at the end of this document.

If the Source Code is G25, indicating that the waste is a residual from a hazardous waste management process, you also need to provide the Management Method code for the process that generated the waste. An example of a G25 waste is still bottoms from distillation of spent solvents. If the Source Code is NOT G25, leave the Management Method code blank. Do not report H141 (Storage/Transfer) as a Management Method code in this section.

If reporting Source Code G61 (Hazardous waste received from off-site for storage/bulking and transfer off-site for treatment or disposal), G17 (Academic lab cleanout under OAC rule 3745-52-213), or G51 (Hazardous wastes received by an LQG from VSQGs under the control of the same person), the generation amount must be zero (0) in Section 2 – Item B.

Source Code G51 should be used when hazardous waste received by an LQG from VSQGs under the control of the same person. Source Code G76 should be used when evaluated hazardous waste pharmaceuticals are accumulated by a reverse distributor.

### **Section 1 Item D: Waste Form Code**

Review the Waste Form Codes and enter the code that best corresponds to the physical form or chemical composition of the hazardous waste reported in Box A. If you are unsure, review laboratory analysis results or other information you have obtained from your off-site receiving facility. Hazardous waste pharmaceuticals should be reported with the Form Code W005 and only by Reverse Distributors and receiving facilities. Hazardous waste pharmaceuticals do not count towards a generator's status determination for a Healthcare Facility and therefore are not reportable by them on a GM Form. You can find a list of Waste Form Codes at the end of this document.

### Section 1 Item E: Waste Minimization Code

Enter the code from the list below that best corresponds to waste minimization, recycling, or pollution prevention efforts implemented or continuing during this reporting year to reduce the volume and toxicity of the hazardous waste reported in Box A. If minimization was not attempted (to the point of implementing a change) for this waste, you must enter an "X" (no waste minimization efforts were implemented for this waste) for this item.

You may provide in the Comments section any additional information (including toxicity and quantity reductions to the extent that data are available) that will help EPA and the states understand your efforts to prevent pollution, minimize waste, or recycle regarding this waste stream. Additionally, you may explain in the Comments section why your efforts were either successful or unsuccessful or why you did not implement waste minimization efforts for this reporting year.

The facility-initiated waste minimization efforts prior to 2019 and continued these efforts during the 2021 reporting year for this hazardous waste		
Code	Description	Examples
A	Continued initiatives to reduce quantity and/or toxicity of this waste	<ul style="list-style-type: none"><li>•Improved production/synthesis processes, e.g., increased efficiency in product usage/formulation, use of less harmful ingredients, modified product composition, or implemented technology conversion.</li><li>•Modified equipment, layout, and/or piping, e.g., longer auto bath analyzers, wastewater treatment system upgraded.</li><li>•Undertook inventory control/waste management processes or safety/good operating practices, e.g., materials shelf-life control, clearinghouse for materials exchange, better labeling procedures, improved maintenance schedule/record keeping/procedures, control production schedule to minimize equipment and feedstock changeovers, bulk systems that replace drums, improved storage, spill/leak/accident prevention, cleaning or degreasing, etc.</li></ul>
B	Continued initiatives to recycle the waste either on-site or off-site	The waste was used, reused, or reclaimed as a result of a change in the product formulation, product's chemical ingredients, or equipment; materials management process with a goal of sustainable use of materials, etc.
The facility-initiated waste minimization efforts during the 2021 reporting year for this hazardous waste		

C	Implemented new initiatives to reduce quantity and/or toxicity of this waste	See examples above for Code A.
D	Implemented new initiatives to recycle the waste either on-site or off-site	See examples above for Code B.
<b>The facility examined or attempted waste minimization efforts for this hazardous waste, but determined it was impracticable to implement these efforts; or the facility did not attempt waste minimization efforts</b>		
N	Waste minimization efforts found to be economically or technically impracticable	Economic constraints or not economically feasible; technical limitations of manufacturing operations, problems preventing or halting efforts (e.g., concern of declined product quality); not appearing to be feasible due to regulatory issues (e.g., permitting requirements or burdens); lack of available technology, etc.
X	No waste minimization efforts were implemented for this waste	The waste was received from off-site and was not generated at this location; the waste is infrequently generated.

### Section 1 Item F: Mixed Waste Generator

Mark an "X" in the box if you are a generator of mixed waste (waste that is both hazardous and radioactive). RCRA defines "mixed waste" as waste that contains both hazardous waste and source, special nuclear, or by-product material subject to the Atomic Energy Act (AEA), RCRA section 1004(41), 42 U.S.C. 6903 (63 FR 17414; April 9, 1998).

### Section 2 Item A: Quantity Generated in the Previous Year

Enter the total quantity of the hazardous waste that was generated during the previous year for the waste described in Section 1. If the waste was not generated in the previous year, enter 0 (zero). The unit of measure (UOM) for Boxes A and B must be the same and will be reported in Box C. If you have difficulty determining the previous year quantity, estimate it as best you can and use the site's previous year Report as a reference, if one was submitted. No statistics will be compiled from the data provided in Box A and providing it is optional.

### Section 2 Item B: Quantity Generated in the Reporting Year

Enter the total quantity of the hazardous waste that was generated during the reporting year for the waste described in Section 1. The UOM and density will be reported in Box C and must be the same as Box A.

NOTE: Be sure to include the quantity of any unshipped waste that you had in your storage area as of December 31 as part of the total amount generated during the reporting year.

### Section 2 Item C: UOM and Density

Enter the unit of measure (UOM) code for the quantity you reported in Boxes A and B. Report quantities in one of the units of measure listed below. **If you select a volumetric measure (gallons, liters, or cubic yards), you must report the density of the waste.** For comparison purposes, the density of water is 8.34 lbs/gal.

#### Code   Unit of Measure

P	Pounds
T	Short tons (2,000 pounds)
K	Kilograms
G	Gallons
L	Liters
Y	Cubic yards

Complete density if you entered Gallons, Liters, or Cubic Yards as the unit of measure. Enter density in either pounds per gallon (lbs/gal) or specific gravity (sg) and check the appropriate box.

### **Was this Waste Treated, Disposed of, or Recycled On-Site?**

Check Yes or No to indicate if the site conducted on-site treatment, disposal, or recycling of the waste reported in Box B. If you checked Yes, complete the box for On-site System 1, and possibly System 2, if applicable. Do not report inactive disposal units in Box D; these are to be listed in Section 4 on the next page along with end of year storage in permitted units.

If the waste is RCRA-regulated and therefore required to be reported, you should submit On-site Process System information for hazardous waste managed on-site, regardless of the regulatory status of the unit.

If you selected Yes, please follow the instructions below. If you selected No, skip to Section 3 instructions.

#### **On-Site Process System 1 and 2: Management Method**

Enter the code for the management system that this waste enters (list begins on page 86). Space is provided to report the on-site management by as many as two different management methods. If you do not have a second process system, leave On-site Process System 2 blank. The space provided for the second on-site system should be used only in the special case of the management of the same waste stream on-site by more than one process system during the reporting year. The two systems would be separate and distinct processes, not intermediate steps. In situations where there are multiple processes leading to an ultimate disposition, such as pre-treatment prior to underground injection, report the underground injection as the sole process system. The extra space should not be used to report the on-site management of the treatment residual generated from management of the waste by the first system type. Report on-site management of treatment residuals on a separate GM Form.

#### **On-Site Process System 1 and 2: Quantity Treated, Disposed, or Recycled On-site in the Reporting Year**

Enter the quantity of hazardous waste described in Section 1 that was treated, disposed, or recycled on-site during the reporting year. Report the quantity in the same unit of measure reported in Section 2, Box C.

### **Section 3 Item A: Was Any of this Waste Shipped Off-Site in the Reporting Year?**

Check Yes or No to indicate if any of the waste described in Section 1 was sent off-site during the reporting year.

Continue to Section 3 Item B if you selected Yes. Please skip to Section 4 if you selected No.

### Section 3 Item B: EPA ID of Facility to Which Waste Was Shipped

Enter the 12-digit EPA ID of the receiving facility to which the waste was shipped. If the facility does not have an EPA ID, leave this space blank and note the reason in the comment section, referencing Section 3, Box B. If the receiving facility is located outside the United States, read the Special Instructions section beginning on page 53 under "Wastes shipped to or received from foreign countries". A list of "FC" ID numbers that DERR uses internally to identify foreign hazardous waste handlers in the Hazardous Waste Report begins on page 88.

Please review the manifests carefully when compiling the information for this section. The facility's EPA ID must correspond with the information you report on the OI Form (Off-Site Transporters and Receiving Facility Information). Receiving facility information is listed in Section 8 on the manifest, while transporter 1 is listed in Section 6 and transporter 2 in Section 7. Past report submittals have contained errors in which the transporter's ID was incorrectly listed as the receiving facility's, particularly with TSD facilities that have a transportation division. Transporter ID numbers are assigned to the company's headquarters, not necessarily to the location where the truck is stationed.

### Section 3 Item C: Management Method

Review the Management Method Codes that begin on page 86. Enter the Management Method Code that best describes the way in which the waste was managed at the **initial receiving facility** reported in Box B. This information should be recorded by the initial receiving facility in Item 19 of the manifest and in Item 36 of a continuation sheet. Call the facility for information or check documentation provided by them if you do not know the correct Management Method type. **Please note** that receiving facilities may make corrections to manifests, in eManifest, after you have received a copy. eManifest is the official copy of record for manifests, and therefore, it is important that you have access to eManifest for the official copy for your report.

This part of the GM Form continues to be the most frequent data quality concern. Here are some suggestions for ensuring that the Management Method code you report is accurate:

- Consult the [national list of receiving facilities available](#) through a link on the Report Web page. This list was compiled using U.S. EPA's Biennial Report database and other reliable sources. The management method codes in this list are the ones considered valid by Ohio EPA staff when reports are reviewed.
- Ask the waste management company to give you the management method code for the initial receiving facility as well as information on the final disposition of the waste. In many instances the initial receiver re-ships the waste to another TSD facility. The management method code in Section 3 Box C should match the handling method used



by the facility listed in Section 3 Box B, the initial receiver. Do not confuse the requirements of this Report with those of the Toxic Release Inventory (Form R); they are not the same.

- Ask the TSD facility to give you the actual management method code they report to the state rather than a literal description that you have to interpret. For example, facilities may have numerous wastewater treatment processes but some list one representative management method code on their waste receipt report rather than several specific ones.
- If the TSD facility divides a waste stream and manages it by completely different methods, such as solvent recovery on one portion and fuel blending on the remainder, list the EPA ID number of the facility twice and apportion the amounts for each of the management method codes. However, if the TSD facility stabilizes a waste and then disposes of it in an on-site landfill, report the ultimate disposition as landfill with H132 as the management method code and not stabilization.
- If you need to use the "Other" Management Method code for TSD facilities, please be sure to explain the handling method in the comment section. The Hazardous Waste Report Coordinator can read the description and determine whether there is a specific code for this method.

### **Section 3 Item D: Total Quantity Shipped in the Reporting Year**

Enter the total quantity of the waste shipped to the facility during the reporting year. Report in the same unit of measure entered in Section 2, Box C. Shipment quantities should equal the total quantity recorded on Uniform Hazardous Waste Manifests for this site during the reporting year, unless there were rejections or discrepancies.

NOTE: If some of the waste generated in the reporting year was not shipped but instead remained on-site in an accumulation area, Section 3 Box D totals will not equal the amount reported in Section 2 Box B. This is acceptable, but should be noted in the comments section. The total quantity of hazardous waste generated by this site will be calculated using the Section 2 Box B amounts from each GM Form submitted. TSD facilities should list wastes remaining on-site in permitted storage areas in Section 4 Box B.

### **Section 4 Item A: As of December 31<sup>st</sup> Did Any of this Waste Remain On-Site In?**

Check "Yes" or "No" to indicate if the site had waste in a permitted storage area or an inactive disposal unit or surface impoundment as of December 31. If you checked "Yes" to Question 1, indicate in Sections 1.a. and/or 1.b. whether this waste was newly generated/accumulated in the reporting year, or if it was generated/accumulated prior to the reporting year. An inactive disposal unit is one in which the Handling Code begins with the letter D, not an S.

If both Sections 1 and 2 are "No", this form is complete unless comments are necessary or extra waste codes need to be listed in the space provided.

#### **Section 4 Item B: Storage and Disposal Unit Identification**

There are spaces provided for reporting four separate management methods. If you need additional lines, continue into the comment section. Supply the Handling Code, Amount, Unit of Measure, and Density. The latter is required if the UOM is gallons, liters, or cubic yards. A list of Handling Codes follows.

##### Storage or Disposal Unit Handling Method Codes

###### Storage

- S01 Container (drum, etc.)
- S02 Tank
- S03 Waste Pile
- S04 Surface Impoundment (temporary)
- S05 Drip Pad
- S06 Containment Building
- S99 Other (specify in comments)

###### Disposal

- D79 Underground Injection
- D80 Landfill
- D81 Land Treatment
- D82 Ocean Disposal
- D83 Surface Impoundment to be Closed as a Landfill
- D99 Other (specify in comments)

**Comments Section**

Use this section as needed to explain anything contained in the form including any waste minimization efforts. The comments may help Ohio EPA make determinations of data validity if questions arise during report review. If there are special circumstances surrounding the waste described on the form, please note this here, especially if you are filing the report due to a one-time event. Up to 2000 characters of your comments will be entered to Ohio EPA's database.

# **INSTRUCTIONS- OI FORM – OFF SITE TRANSPORTER AND RECEIVING FACILITY INFORMATION**

## **WHO MUST SUBMIT THIS FORM?**

Sites that had hazardous waste transported off-site in the reporting year must submit an OI Form.

## **PURPOSE OF THIS FORM**

The OI Form documents the names and addresses of off-site transporters and receiving facilities. The latter are listed by EPA ID in Section 3 of one or more GM Forms. The OI Form links with one or more GM Forms to provide the names and addresses of these facilities.

## **HOW TO COMPLETE THIS FORM**

The OI Form is divided into four identical parts. You must fill out one part for each off-site receiving facility to which you shipped hazardous waste and each transporter you used during the reporting year. If these off-site facilities and transporters total more than four, you must photocopy and complete additional copies of the form. You should not complete a separate OI Form for each GM Form; a transporter and/or receiving facility ID should be listed only once.

## **ITEM-BY-ITEM INSTRUCTIONS**

Complete Boxes A through D for **each** off-site receiving facility to which you shipped hazardous waste and Boxes A through C for **each** transporter you used during the reporting year. If the transporter and the receiving facility have the same EPA ID number, you can list them as one site and check both handler types in Box C. The individual EPA IDs for all transporters used and all initial receiving facilities should appear only once on the OI Form; completing a duplicative OI Form per GM Form is not necessary.

Please review the manifests carefully when compiling the information for this form. Receiving facility information is in Sections 9 & 10 on the manifest, while transporter 1 is listed in Sections 5 & 6 and transporter 2 in Sections 7 & 8. Past report submittals have contained errors in which the transporter's ID was incorrectly listed with the receiving facility's name and address, particularly in situations where the company has its own transportation fleet. Conversely, the receiving facility's ID has at times been listed as a transporter when in fact this is not appropriate. Transporter ID numbers are assigned to a company's headquarters, not necessarily to the location where the trucks are stationed.

**Item A: EPA ID of Transporter or Receiving Facility**

Enter the 12-digit EPA ID number of the off-site receiving facility to which you shipped hazardous waste or the EPA ID number of the transporter who took hazardous waste from your site. If the facility or transporter is based outside of the United States, see the Special Instructions section beginning on page 64 under "Wastes shipped to foreign countries." A list of "FC" ID numbers that DERR uses internally to identify foreign hazardous waste handlers begins on page 88. **Note** that the receiving facility and transporter may be the same company with two separate EPA IDs: one for transporting and one for receiving. Please make sure to list the proper EPA ID and corresponding regulated activity for that specific EPA ID on this Form.

**Item B: Name of Off-Site Receiving Facility or Transporter**

Enter the name of the off-site receiving facility or transporter reported in Box A (40-character maximum). If the name has changed, list the current name.

**Item C: Handler Type**

Check all boxes that apply to describe the handler type of the EPA ID reported in item A.

**Item D: Address of Receiving Facility**

Enter the address of the off-site receiving facility reported in Box A. Reporting the address for transporters is not required because of their unusual ID assignment protocol as mentioned above. However, if you do provide it, report the address for the transporter's headquarters because this is the location to which the EPA ID is assigned.

IF YOU ARE A GENERATOR ONLY AND DO NOT RECEIVE WASTE FROM OFF-SITE,  
YOU CAN **STOP HERE** AFTER COMPLETING THE OI FORM. THE WR AND PS FORMS  
DO NOT APPLY TO YOU.

# INSTRUCTIONS- WR FORM – WASTE RECEIVED FROM OFF-SITE

## WHO MUST SUBMIT THIS FORM?

A site required to file the Hazardous Waste Report must submit this form if, during the reporting year, it received RCRA hazardous waste from off-site.

Reverse distributors are required to file a Hazardous Waste Report using a GM Form, not a WR Form, for the evaluated hazardous waste pharmaceuticals they accumulate.

## PURPOSE OF THIS FORM

In addition to listing customer identification data, the WR Form contains three identical sub-boxes labeled Waste 1, Waste 2, and Waste 3, which collect information about the quantities and characteristics of each hazardous waste received from off-site during the reporting year.

Note that Ohio EPA will use the total amount reported on the WR Forms to determine the total amount received only. The total amount processed in a treatment, disposal, or recycling unit during the reporting year will come from the RCRA Influent Quantity listed in Box C of the PS Form.

## HOW TO COMPLETE THIS FORM

A separate WR Form must be filled out for each off-site generator; photocopy and fill out additional copies as needed. However, Ohio EPA encourages submittal of data via the eBusiness Center, which eliminates the need for re-keying and improves the data quality. If you need information about the required import file structure for the Hazardous Waste Report Service, contact System Administrator Paula Canter. The [file specification guide](#) can be found on DERR's Hazardous Waste Report Web page.

**NOTE:** Refer to the [Special Instructions](#) section for instructions on reporting wastes received from VSQGs and foreign generators.

## ITEM-BY-ITEM INSTRUCTIONS

### GENERATOR INFORMATION

All the wastes described on this page were received from the generator listed at the top of the form. If more than three wastes were received and additional pages are necessary, you can leave the address data fields blank on the next page in the Generator Information section if the pages are in successive order.

**EPA ID:** Enter the 12-digit EPA ID for the generator. If the generator's status is Very Small and they do not have an EPA ID, enter the generator's state postal code plus the letters VSQG and leave the remaining spaces blank (e.g., OHCESQG, OHVSQG). A list of ID numbers that DERR uses internally to identify foreign hazardous waste handlers is on page 88.

**Name:** Enter the name of the generator in 40 spaces or less. If the name has changed during the year, list the current name.

**Street:** Enter the street address for the customer's location, not the mailing address. This information will be used to verify that the EPA ID listed is the correct one for the generator. EPA IDs are site-specific and independent of ownership.

**City, State, and Zip:** Enter the location city, state, and zip code. The Plus-4 zip code is optional.

### WASTE INFORMATION

#### Item A: Description of Hazardous Waste

Provide a concise description of the waste in a maximum of 60 characters, citing the waste type, source, and the generic chemical name or primary hazardous constituents. When describing the waste, don't be too vague ("Waste flammable liquid") or overly detailed (listing every single chemical in a lab pack). If possible, describe the waste and how it was generated in everyday terminology; "Spent xylene and toluene from paint booth cleaning" or "Outdated chemicals from a lab clean-out" are acceptable descriptions.

It is not necessary to include DOT manifest labeling descriptions such as "RQ", "n.o.s.", Hazard Class, or UN/NA code. EPA does not use this information.

#### Item B: Management Method Code

Review the management method codes found on page 86. Enter the one code that best describes the on-site treatment, disposal, or recycling process system in which the waste was or will be managed.

If the waste was received in the reporting year but not processed by December 31, enter the code for the management method that the waste will ultimately be managed under. You must also submit a PS Form describing this process system unless this waste was shipped off-site without treatment (Management Method code H141).

### **Item C: Waste Form Code**

Review the form codes and enter the code that best corresponds to the physical form or chemical composition of the hazardous waste reported in Box A.

### **Item D: Quantity Received in the Reporting Year**

Report the total quantity of the hazardous waste (reported in Box A) that was received from this off-site generator during the reporting year. If more than one shipment of this same waste was received from the generator, add the quantities and report only the sum.

If the waste was shipped in gallon units, please report it as such and provide the density as required. This makes it possible for Ohio EPA to compare waste shipments reported by generators with waste receipts reported by receiving facilities. The density conversion factor used can be quite different and leads to questions about the validity of the data. Having information on the original values prior to conversion to weight units will help Ohio EPA determine if a problem exists. If a waste stream was shipped in two different units, some in gallons and some in pounds, convert it all to the same unit and list the density conversion factor used.

### **Item E: UOM and Density**

Enter the unit of measure (UOM) code for the quantity received which was reported in Box E. Report quantities in one of the units of measure listed. If you select a volumetric measure (gallons, liters, or cubic yards), you must report the density of the waste.

When listing quantities for the UOM and Density, please write legibly. While most boxes do not contain lines and allow free hand entry, these boxes contain lines indicating a specific form of quantity. Use the Unit of Measure that most accurately portrays the waste amount. For example, converting from pounds to tons and then rounding would be less accurate than simply reporting the original pounds value.

#### Code   Unit of Measure

P	Pounds
T	Short tons (2,000 pounds)
K	Kilograms



- G      Gallons
- L      Liters
- Y      Cubic yards

Complete density if you entered Gallons, Liters, or Cubic Yards as a unit of measure. Provide the density in either pounds per gallon (lbs/gal) or specific gravity (sg) and check the appropriate box.

#### **Item F: EPA Hazardous Waste Codes**

Enter the EPA Hazardous Waste Code(s) that apply to the waste reported in Box A. If you need room for additional codes, check the More... box and use the form provided for overflow. The generator's EPA ID should be recorded at the top left of the overflow page.

A designated facility that receives noncreditable hazardous waste pharmaceuticals from a healthcare facility may not have the hazardous waste codes from the healthcare facility to include on the WR Form. For reporting purposes, the receiving designated facility should use the PHRM waste code on the WR form. In contrast, a reverse distributor must include hazardous waste codes when manifesting evaluated hazardous waste pharmaceuticals. Therefore, a designated facility that receives evaluated hazardous waste pharmaceuticals from a reverse distributor must report the applicable hazardous waste codes on the WR Form.

# **INSTRUCTIONS- PS FORM – COMMERCIAL PROCESS SYSTEMS FOR TREATMENT, DISPOSAL, OR RECYCLING**

## **WHO MUST SUBMIT THIS FORM?**

Sites required to file the Hazardous Waste Report that are commercial treatment, disposal, or recycling (TDR) facilities are required to submit a PS Form listing information about each hazardous waste TDR process system that operated during the reporting year.

## **PURPOSE OF THIS FORM**

The PS Form is divided into four identical sections which collect basic information on each hazardous waste TDR process system that was operational during the reporting year.

Note that Ohio EPA will use the total amount reported on the WR Forms to determine the total amount received only. The total amount processed in a treatment, disposal, or recycling unit during the reporting year will come from the RCRA Influent Quantity in Box C of the section completed for each system type.

## **HOW TO COMPLETE THIS FORM**

Up to four processes can be reported on one PS Form; photocopy and fill out additional pages as necessary. The system types listed on WR Forms should be a subset of or equivalent to those for which a PS Form is completed. Waste storage is not reported on a PS Form. Use the Comments section to clarify or continue any entry.

## **WHAT IS A TDR PROCESS SYSTEM?**

A TDR process system is one or more processes used to treat, dispose of, or recycle a hazardous waste. A process is defined as one or more units acting together to perform a single operation on hazardous waste. A unit is a single piece of equipment -- e.g., one tank, one distillation column, or one surface impoundment -- in which a hazardous waste is treated, disposed, or recycled.

## **IDENTIFICATION OF A TDR PROCESS SYSTEM**

A hazardous waste treatment, disposal, or recycling process system is identified by each hazardous waste entry point into a process or sequence of processes. The process system begins at the unit where the hazardous waste first enters and consists of all other treatment, disposal, or recycling units downstream from the point of entry except for the following units:

- Incineration/thermal treatment;
- Underground injection;
- Landfills;

- Land treatment/application/farming;
- Surface impoundment to be closed as landfill; and
- Other disposal

Each of the above processes is always to be identified as a separate process system and reported separately on a PS Form. Storage is not to be reported on this form.

Classify each process system under a system type that uniquely identifies the process system by indicating the primary purpose/operation it performs. For example, a process system to remove dissolved metals from wastewater typically includes equalization, pH adjustment, chemical precipitation, flocculation, clarification/settling, and dewatering of the sludge removed from the bottom of the clarifier.

The chemical precipitation process best identifies the primary purpose of the treatment system, which is to remove metals from the wastewater. Therefore, categorize the process system under the system type of chemical precipitation.

The following examples demonstrate process system identification.

Figure 1 shows a simple hazardous wastewater treatment system. Hazardous waste (HW) can enter the three-unit processes for treatment at only one point, the chemical precipitation process. Therefore, there is only one hazardous waste treatment process system. The system consists of chemical precipitation, clarification/settling, and sludge dewatering (filter press) processes. The chemical precipitation process best identifies the primary purpose of the treatment system; therefore, the process system should be categorized under chemical precipitation (system type code H077). By this method, recycle and non-hazardous waste do not affect process system identification.

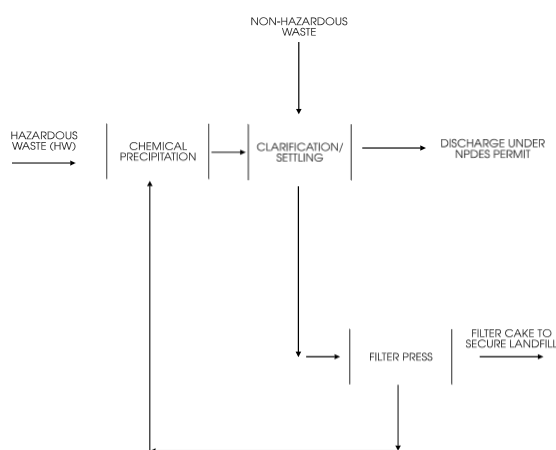


Figure 1. Flow Diagram of a Simple Process System

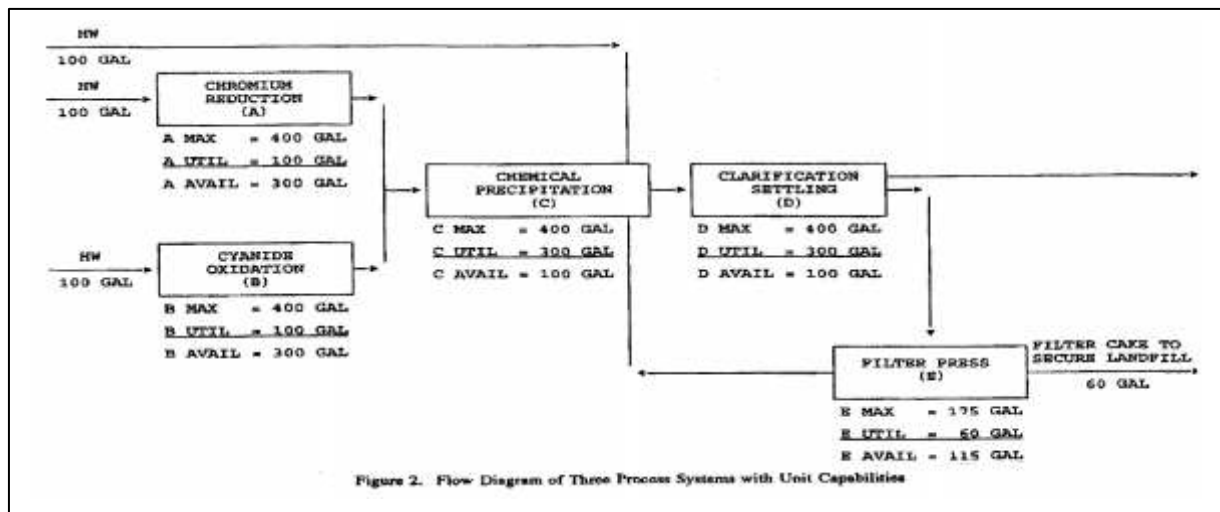


Figure 2 depicts three hazardous waste treatment systems. There are three hazardous waste (HW) entry points, each to a unit that performs a different process.

- The first waste treatment system consists of chromium reduction (A), chemical precipitation (C), clarification/settling (D), and a sludge dewatering filter press (E). The management method for this unit is chromium reduction followed by chemical precipitation (management method code H071) because the primary purpose of the process system is the treatment and removal of chromium wastes.
- The second waste treatment process system consists of a cyanide oxidation process (B), followed by chemical precipitation (C) of metals, clarification/settling (D), and dewatering in a filter press (E). The management method is cyanide oxidation followed by a chemical precipitation (management method code H077) because the primary purpose of the process system is to destroy cyanide wastes and remove metals from the same waste.
- The third treatment process system is for a general metal-containing waste consisting of chemical precipitation (C) of metals, clarification/settling (D), and sludge dewatering in a filter press (E). The management method is chemical precipitation (management method code H077).

At first glance, Figure 3 seems to show two process systems because there are two hazardous waste entry points. On closer examination, however, it can be seen that the two wastes feed into two different tanks that conduct the same process in parallel. For purposes of reporting process system capacity, these two units are considered as one process, chromium reduction followed by chemical precipitation (H071), with the utilized and maximum capacities of the

"aggregated unit" equal to the sum of the utilized and maximum capacities of both units. Therefore, Figure 3 depicts only one hazardous waste treatment process system.

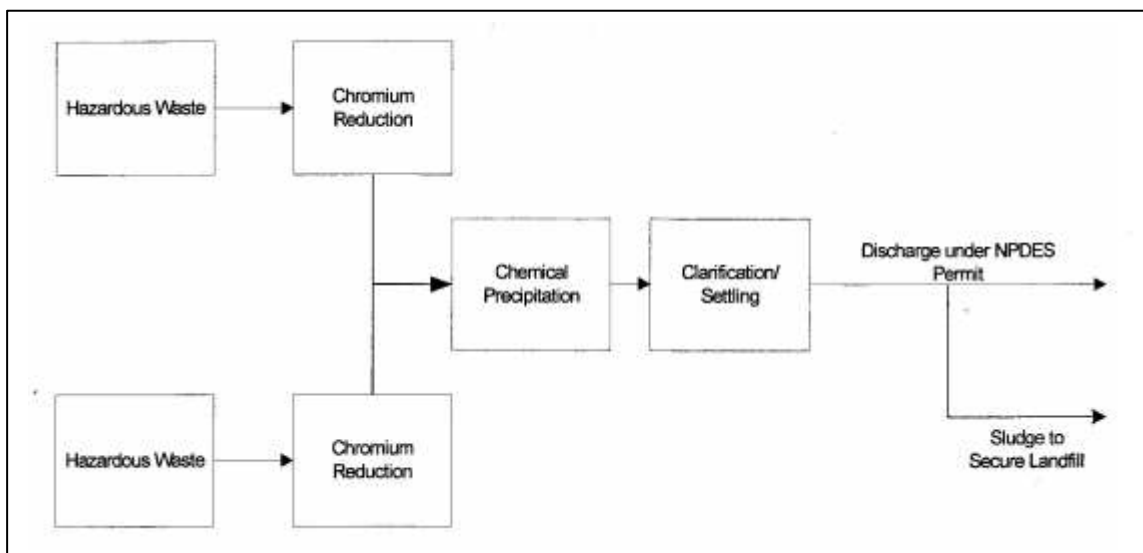


Figure 3. Flow Diagram of One Process System with Two Units Conducting the Same Process

## ITEM-BY-ITEM UNSTRUCTIONS

### Item A: Treatment, Disposal, or Recycling Process Description

Describe the processes in this system, the types of units used to carry out the processes, and the types of wastes managed.

Examples:

"Incineration of D001 waste sludge and non-hazardous refuse in two rotary kiln incinerators."

"Solvent recovery and chemical treatment in tanks."

### Item B: Management Method

Review the management method codes and enter the code that best describes the process system. Remember that the management methods listed on WR Forms should be a subset of or equivalent to those for which a PS Form is completed.

### Item C: The Reporting Year Influent Quantity

Box C has four parts. Complete each part according to the instructions below. Right justify all entries. Note that the RCRA Influent Quantity is the amount that Ohio EPA will use in determining the total amount of hazardous waste managed in this system for the reporting year. The total from WR Forms will represent the amount received during the reporting year.

- **Total:** Enter the total quantity of waste entering the system during the reporting year. Include all waste influents, both RCRA hazardous and non-hazardous. Exclude quantities of catalysts, reagents, and other non-waste materials that enter the system as part of a management process. You may estimate the quantity of waste entering the system. Write in the Comments section that the Total Influent Quantity in Box C is estimated.

For a system that shares units or processes with another system: Enter the total quantity of waste influent to the system, excluding any influent quantity that originates in another system with which a unit or process is shared. For example, in completing a PS Form for the "chemical precipitation" system type in Figure 2, enter in Box C only the quantity of metal-bearing waste (100 gal) entering the chemical precipitation process. Do not count the quantity of chromium-bearing waste that flows into the "chrome reduction followed by chemical precipitation" system type as influent quantity. Similarly, do not count the quantity of cyanide and metal-bearing waste that flows into the "cyanide oxidation followed by chemical precipitation" system type as influent to the "chemical precipitation" system type because it originates in different systems (even though it also flows into the first process of the "chemical precipitation" system).

- **RCRA:** In the RCRA space, enter the amount of the Total Influent to the process system that was RCRA hazardous waste. This should always be equal to or less than Total.
- **UOM:** Enter the unit of measure (UOM) code for the influent quantities reported in Box C. Report quantities in one of the units of measure listed below. If you select a volumetric measure (gallons, liters, or cubic yards), you must also report the density of the waste in Box C.

<u>Code</u>	<u>Unit of Measure</u>
-------------	------------------------

P	Pounds
T	Short tons (2,000 pounds)
K	Kilograms
G	Gallons

L      Liters  
Y      Cubic yards

Complete density if you entered Gallons, Liters, or Cubic Yards. Provide the density in either pounds per gallon (lbs/gal) or specific gravity (sg) and check the appropriate box.

**Comments Section**

Use this section as needed to provide an explanation of anything related to this process system.

## SPECIAL INSTRUCTIONS

These instructions explain how to complete the Hazardous Waste Report for wastes and waste handlers with unique regulatory or reporting requirements.

### **Academic Laboratory Clean-Out**

An academic laboratory clean-out conducted in accordance with OAC rule 3745-52- 213(A), is defined as: once per 12 months per laboratory, a laboratory will have 30 days to conduct a clean-out and will not have to count the hazardous waste that consists of unused commercial chemical products (either listed or characteristic) generated during those 30 days towards the eligible academic entity's generator status for the purposes of on-site accumulation. See 3745-52-213(A)(1-4) for other academic laboratory clean-out requirements.

The waste generated from this clean-out should be reported on the GM Form with a source code of "G17 – Subpart K Laboratory Waste Clean-out" with a generation amount of zero (0) (Section 2, Item B). The amount shipped off-site or managed on- site will be reported in Sections 2 or 3 of the GM Form as appropriate.

Laboratory waste that is generated during routine operations (e.g., spent solvents or spent acids/bases) should be reported separately from academic laboratory clean- out wastes. Routinely generated laboratory waste should be reported with source code(s) other than G17.

### **Asbestos, PCBs, and Waste Oils**

In most cases, do not report asbestos, PCBs, and waste oils. However, you must report them if any of the following conditions exist:

- If a listed RCRA hazardous waste (i.e., waste code begins with F, K, P, or U) is mixed with asbestos, PCBs, or waste oil, in which case the entire mixture is a hazardous waste; or
- If the waste possesses one or more of the characteristics that result in assigning a waste code beginning with a D. (This does not apply to used oil that is recycled, as explained below.)

**Do not** report used oil that is recycled and is also a hazardous waste solely because it exhibits a hazardous characteristic (criterion 2 above). Used oil that is recycled includes any used oil which is reused, following its original use, for any purpose (including the purpose for which the oil was originally used). Such term includes, but is not limited to, oil which is re-refined, reclaimed, burned for energy recovery, or reprocessed [OAC 3745-51-06(A)(4)].



## Lab Packs

The following rules apply to the reporting of lab pack wastes:

- Enter a Form Code indicating lab packs (W001 or W004) on the GM Form, Box D. These Form Codes are to be used with any lab pack, whether the wastes are gaseous, liquid, solid, or sludge. Note that if the lab pack contains HW pharmaceuticals, Form Code W005 supersedes W001 or W004.
- You may aggregate lab pack waste containers in most cases. However, you must segregate them by Form Code. If they contain **acute hazardous wastes** (waste codes F020, F021, F022, F023, F026, F027, and all P Waste Codes), report them separately from lab packs containing non-acutely hazardous wastes.
- Be sure to complete the management method information in Section 3 properly if individual shipments are managed differently, even if they went to the same receiving facility. If the TSD facility uses two different methods on one waste stream, list the EPA ID number of the facility twice and apportion the amounts for each of the management method codes.
- When reporting quantities for lab packs:
  - i. **Include** the weight of the containers if they are disposed (e.g., landfilled) or treated (e.g., incinerated) along with the waste.
  - ii. **Exclude** the weight of the containers if the waste is removed from the containers before treatment or disposal.
- Source Codes for lab packs vary depending on the situation. Review the codes carefully to determine which is most appropriate.

## Groundwater Contaminated by Hazardous Waste

Groundwater contaminated by RCRA hazardous waste leachate is not considered a solid waste and is, therefore, not classified as a hazardous waste. However, because hazardous waste is "contained in" the groundwater, it must be treated "as if" it was a RCRA hazardous waste if it is removed for treatment, storage or disposal. When reporting groundwater contaminated by hazardous waste in the Hazardous Waste Report, observe the following conventions:

- Enter "0" in the GM Form, Section 2, Item B (quantity). Explain in the Comments section that it is groundwater, not a hazardous waste that was generated on-site.
- Report quantities managed on-site (GM Form, Section 2, On-site Process Systems 1 and 2); quantities shipped off-site for management (GM Form,

Section 3); and quantities received from off-site and managed on-site (WR Form, Item D).

To determine if the contaminated media must be reported at all (generated OR treated): If the contamination is due to a characteristic waste, then it is the generator's responsibility to determine if the contaminated groundwater is a hazardous waste. Once the characteristics are eliminated, the media is no longer considered to "contain" hazardous waste. If a facility has first removed groundwater and is claiming that the groundwater is contaminated with a listed hazardous waste or "contains" listed hazardous waste, EPA Regions or Authorized States should make a site-specific determination of whether the media is a RCRA Waste.

### **RCRA-Radioactive Mixed Wastes**

By themselves, source material, special nuclear material, or by-product materials (See Definitions section, beginning on page 56), as defined by the Atomic Energy Act of 1954, as amended, 42 U.S. Code 2011 et. seq., are not classified as hazardous wastes under RCRA. However, if these materials are mixed with a RCRA hazardous waste, the material is controlled under RCRA regulation, as well as under the Atomic Energy Act (DOE, NRC, and EPA) regulations, and is to be reported.

### **Wastes Received from Very Small Quantity Generators (VSQG)**

Waste management facilities sometimes receive hazardous wastes from large numbers of Very Small Quantity Generators (VSQGs) who do not have ID numbers. To minimize the response burden for filling out the WR Form, you may aggregate these wastes across generating sites, in accordance with the following guidelines:

- All the wastes must have the same EPA Waste Code, Form Code, and Management Method Code.
- Wastes received from different States must be reported separately. The Generator Information Section should list the two-letter postal code of the originating State, followed by the letters "VSQG". For example, wastes received from several VSQG sites in the State of Alaska (AK) could be aggregated onto a single WR Form and reported as generator "AKVSQG" with the name listed as "Alaska VSQG Totals".
- The total quantity of each waste stream should be listed in Box E.

### **Waste Received from Small Quantity Handlers of Universal Waste (SQHUW)**

Waste management facilities sometimes receive universal wastes from large numbers of Small Quantity Handlers of Universal Waste who do not have EPA ID numbers. To minimize the response burden for filling out the WR Form, you may aggregate these wastes across generating sites, in accordance with the following guidelines:

- All the wastes must have the same EPA Waste Code, Form Code, and Management Method Code
- Wastes received from different States must be reported separately. The Generator Information Section should list the two-letter postal code of the originating State, followed by the letters “UWHANDLERS”. For example, wastes received from several Small Quantity Handlers of Universal Waste sites in the State of Alaska (AK) could be aggregated onto a single WR Form and reported as generator “AKUWHANDLERS” with the name listed as “Alaska SQHUW Totals”.
- The total quantity of each waste stream should be listed in Box E.

#### Wastes Shipped to or Received from Foreign Countries

Review the list of foreign hazardous waste handlers that begins on page 88. Ohio EPA uses these “FC” ID numbers in the Hazardous Waste Report database for internal tracking purposes only. They are not used on manifests. If the handler is not listed, call or email HW Report support staff in DERR to request creation of a FC number. Include the name and address of the handler. If the handler is a receiver, provide the applicable Management Method Code(s) so they can be added to the reference table.

#### Fluorescent Lamps

If you manage your fluorescent lamps under Ohio’s universal waste rules, you do not need to list them on the report because they do not count toward the site’s generator status determination. If you manage your fluorescent lamps under Ohio’s hazardous waste rules, however, you must list them on the report regardless of whether they are recycled or land disposed. For more information on your hazardous waste lamp management options, see DERR’s [Fluorescent Lamps web page](#).

## DEFINITIONS

**72-Hour Recycler:** Owners or operators of facilities that recycle (i.e., use, reuse or reclaim according to OAC rule 3745-51-01) hazardous waste received from off-site facilities if the hazardous waste is placed into the recycling process within 72 hours of arriving at the facility. These recyclers do not need a storage permit but are subject to the requirements contained in OAC rule 3745-51-06(C)(3) including biennial reporting.

**Academic Laboratory Rules:** An alternative set of generator requirements for managing laboratory hazardous waste at eligible academic entities. Generators that are eligible academic entities with laboratories may elect to opt into OAC rules 3745-52-200 through 3745-52-216 and manage their laboratory hazardous waste under these rules in lieu of [3745-52-15](#) (or [3745-52-14](#) for VSQGs). For eligible academic entities (see definition) to opt into or subsequently withdraw from the academic laboratory rules, they must use the Site ID Form to notify Ohio EPA. Refer to 3745-52-203 (opt in) and 3745-52-204 (withdraw).

**Accumulation:** A site that does not hold RCRA Interim Status or a RCRA permit may accumulate hazardous waste for a short period of time before shipping it off-site. The waste must be accumulated in either tanks or containers; it may not be accumulated in surface impoundments. Generators of more than 1,000 kg (2,200 lbs) of non-acute hazardous waste per month may accumulate their waste for up to 90 days before shipping it off-site. Generators of 100 kg (220 lbs) to 1,000 kg (2,200 lbs) of non-acute hazardous waste per month may accumulate their waste for up to 180 days before shipping it off-site. If the nearest treatment, storage, disposal, or recycling facility to which they can send their waste is more than 200 miles away, they may accumulate their waste for 270 days. See OAC rule 3745-52-34.

**Acute Hazardous Waste:** Any hazardous waste with an EPA Hazardous Waste Code beginning with the letter P or any of the following F codes: F020, F021, F022, F023, F026, and F027. These wastes are subject to stringent quantity standards for accumulation and generation. See OAC rule 3745-51-05(E).

**Authorized Representative:** The person responsible for the overall operation of the site or an operational unit (i.e., part of a site), e.g., superintendent or plant manager, or person of equivalent responsibility. See [OAC rule 3745-50-42](#).

**Authorized State:** A State that has obtained authorization from EPA to direct its own RCRA program. Ohio is an authorized state.

**Boiler:** An enclosed device using controlled flame combustion and having the following characteristics:

- The unit has physical provisions for recovering and exporting energy in the form of steam, heated fluids, or heated gases;
- The unit's combustion chamber and primary energy recovery section(s) are of integral design (i.e., they are physically formed into one manufactured or assembled unit);
- The unit continuously maintains an energy recovery efficiency of at least 60 percent, calculated in terms of the recovered energy compared with the thermal value of the fuel;
- The unit exports and utilizes at least 75 percent of the recovered energy, calculated on an annual basis (excluding recovered heat used internally in the same unit, for example, to preheat fuel or combustion air or drive fans or feedwater pumps); or
- The unit is one which the Director has determined, on a case-by-case basis, to be a boiler, after considering the standards in OAC rule 3745-50-25

**By-product Radioactive Material:** (1) Any radioactive material (except special nuclear material) yielded in or made radioactive by exposure to the radiation incident to the process of producing or utilizing special nuclear material; and (2) The tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material content (defined in the Atomic Energy Act of 1954).

**Code of Federal Regulations:** The detailed regulations, written by Federal agencies, to implement the provisions of laws passed by Congress. Regulations in the CFR have the force of Federal law.

**Characteristic Waste:** A waste classified as hazardous because it is ignitable, corrosive, reactive, or toxic as determined by the toxicity characteristic leaching procedure. It has an EPA Hazardous Waste Code in the range D001 to D043. Each of these four characteristics is defined in OAC rules 3745-51-20 through 3745-51-24.

**Delisted Wastes:** Site-specific wastes that are excluded from regulation under 40 CFR 260.20 and 260.22. A waste at a particular generating site may be excluded or delisted from the lists of hazardous waste in OAC rules 3745-51-30 through 3745-51-33 by petitioning the EPA Administrator for a regulatory amendment. These wastes are listed in Appendix IX of 40 CFR Part 261.

**Destination Facility for Universal Waste:** A facility that treats, disposes, or recycles universal waste on-site. A hazardous waste permit is required if you treat or dispose of universal wastes; a permit may be required if you recycle universal wastes.

**Disposal:** The discharge, deposit, injection, dumping, spilling, leaking, or placing of any hazardous waste into or on any land or water or air so that such hazardous waste or any

constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters, except where such activity constitutes “storage” or “treatment” as defined in OAC Rule 3745-50-10.

**Electronic Manifest Broker:** A person as defined in title 40 CFR §260.10 that elects to use the electronic manifest system to obtain, complete and transmit an electronic manifest format supplied by the EPA electronic manifest system under a contractual relationship with a hazardous waste generator.

**Eligible Academic Entity:** A college or university, or a non-profit research institute that is owned by or has a formal written affiliation with a college or university, or a teaching hospital that is owned by or has a formal written affiliation with a college or university.

**EPA Identification Number (EPA ID):** The number assigned by the EPA to each hazardous waste generator, hazardous waste transporter, and treatment, storage, or disposal facility; United States importer of hazardous waste; mixed waste (hazardous and radioactive) generator; recycler of hazardous waste; exempt boiler and/or industrial furnace burning or processing hazardous waste; large quantity handler of or destination facility for universal wastes; disposer of hazardous waste with an underground injection permit; used oil transporter, used oil processor/re-refiner, off- specification used oil fuel burner, used oil fuel marketer; eligible academic entity managing laboratory hazardous waste under the academic laboratory rules; or site undergoing corrective action. Ohio EPA is the authorized implementer for the EPA ID assignment program in Ohio.

**Episodic Generator:** An episodic generator is either a VSQG or an SQG who, as a result of a planned or unplanned episodic event, generates a quantity of hazardous waste in a calendar month sufficient to cause the facility to move into a more stringent generator category. NOTE: When completing a Site ID Form which will include the Episodic Generator Addendum, the generator size required in item 9.A.1 should be the normal one for the site, not the size applicable to the episodic event.

**Excluded Wastes:** Wastes excluded from regulation under OAC rule 3745-51-04 and OAC rule 3745-51-03(C)(2).

**Form Code:** A code that corresponds to the physical form or chemical composition of a hazardous waste. This code is required on both the GM and WR Forms.

**GM Form:** Form for reporting waste Generation and on-site Management at a facility.

**Hazardous Waste:** By-product of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. It is a waste that possesses at least one of four characteristics (ignitability, corrosivity, reactivity, and toxicity), or appears on special EPA lists ("listed waste"). A hazardous waste is regulated under Subtitle C of RCRA. The regulatory definition of hazardous waste is found in 40 CFR 261.3 (OAC Chapter 3745-51).

**Hazardous Waste Code:** The code assigned to each hazardous waste listed in OAC rules 3745-51-31 through 3745-51-33 and to each characteristic identified in OAC rules 3745-51- 21 through 3745-51-24. The codes consist of one letter (D, F, P, U, or K) and three numbers. A list of the [EPA Hazardous Waste Codes](#) can be found on DERR's Hazardous Waste Report web page.

**Hazardous Waste Generator:** Any person, by site, whose act or process produces hazardous waste identified or listed in Chapter 3745-51 of the Administrative Code or whose act first causes a hazardous waste to become subject to the hazardous waste rules.

**Hazardous Waste Transfer Facility:** Any transportation-related facility including loading docks, parking areas, storage areas and other similar areas where shipments of hazardous waste are held for 10 days or less during the normal course of transportation [OAC Rule 3745-50-10(A)(132)].

**Hazardous Waste Transporter:** A person engaged in the off-site transportation of hazardous waste by air, rail, road, or water [OAC rule 3745-50-10(A)(135)].

**Hazardous Waste Treatment:** Any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such hazardous waste, or so as to recover energy or material resources from the hazardous waste, or so as to render such hazardous waste non-hazardous or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, storage, or reduction in volume [OAC rule 3745-50-10(A)(137)]. Such term includes any activity or processing designed to change the physical form or composition of hazardous waste to render it non-hazardous.

**Healthcare Facility:** A "Healthcare facility" means any person that is lawfully authorized to do either of the following:

- Provide preventative, diagnostic, therapeutic, rehabilitative, maintenance or palliative care, and counseling, service, assessment or procedure with respect to the physical or mental condition, or functional status, of a human or animal or that affects the structure or function of the human or animal body.
- Distribute, sell, or dispense pharmaceuticals, including over-the-counter pharmaceuticals, dietary supplements, homeopathic drugs, or prescription

pharmaceuticals. This definition includes, but is not limited to, wholesale distributors, third-party logistics providers that serve as forward distributors, military medical logistics facilities, hospitals, psychiatric hospitals, ambulatory surgical centers, health clinics, physicians' offices, optical and dental providers, chiropractors, long-term care facilities, ambulance services, pharmacies, long-term care pharmacies, mail-order pharmacies, retailers of pharmaceuticals, veterinary clinics, and veterinary hospitals. This definition does not include pharmaceutical manufacturers, reverse distributors, or reverse logistics centers.

**Incineration:** Burning of certain types of solid, liquid, or gaseous materials; or a treatment technology involving destruction of waste by controlled burning at high temperatures (e.g., burning sludge to remove the water and reduce the remaining residues to a safe, non-burnable ash which can be disposed safely on land, in some waters, or in underground locations).

**Industrial Furnace:** Any of the following enclosed devices that are integral components of manufacturing processes and that use thermal treatment to accomplish recovery of materials or energy: cement kilns; lime kilns; aggregate kilns; phosphate kilns; coke ovens; blast furnaces; smelting, melting and refining furnaces; titanium dioxide chloride process oxidation reactors; methane reforming furnaces; pulping liquor recovery furnaces; combustion devices used in the recovery of sulfur values from spent sulfuric acid; halogen acid furnaces, as defined under industrial furnace in OAC rule 3745-50-10; and such other devices as the U.S. EPA Administrator may add to this list.

**Interim (Permit) Status:** Period during which the owner/operator of an existing TSD facility is treated as having been issued a RCRA permit even though he/she has not yet received a final determination. An existing facility should have automatically qualified for interim status if the owner/operator filed both timely "notification" and the first part (Part A) of the RCRA permit application. Interim status continues until a final determination is made to issue or deny the permit. Owner/operator of new facilities cannot by definition qualify for interim status; rather, they need a RCRA permit prior to beginning construction of a hazardous waste management facility.

**Large Quantity Generator of Hazardous Waste (LQG):** For the purposes of the Hazardous Waste Report, a site is a LQG if it met any of the following criteria:

- The site generated in any one calendar month during the reporting year, 1,000 kg (2,200 lbs) or more of RCRA hazardous waste; or
- The site generated in any one calendar month during the reporting year, or accumulated at any time, 1 kg (2.2 lbs) of RCRA acute hazardous waste; or



- The site generated in any calendar month more than 100 kg (220 lbs) of spill cleanup material contaminated with RCRA acute hazardous waste.

**Listed Wastes:** Wastes specifically named in OAC rules 3745-51-31 through 3745-51-33. These wastes are listed as hazardous under RCRA but have not been subjected to the toxic characteristics listing process because the dangers they present are considered self-evident. They bear EPA Hazardous Waste Codes beginning with the letters F, P, U, or K.

**Large Quantity Handler of Universal Waste (LQHUW):** A universal waste handler (as defined in OAC rule 3745-273-09) who accumulates 5,000 kg or more total of universal wastes (batteries, pesticides, mercury-containing equipment, or lamps – calculated collectively) at any time. This designation is retained through the end of the calendar year in which the 5,000 kg limit is met or exceeded.

**Management or Hazardous Waste Management:** Systematic control of the collection, source separation, storage, transportation, processing, treatment, recovery, or disposal of hazardous waste (OAC rule 3745-50-10).

**Manifest, Uniform Hazardous Waste:** The shipment document EPA form 8700-22 and, if necessary, Form 8700-22A, originated and signed by a generator. The “cradle-to-grave” paperwork must accompany a shipment of hazardous waste as it moves from the generator to the transporter and eventually to the hazardous waste management facility.

**Mixed Waste:** Waste that contains both hazardous and source, special nuclear, or by-product material subject to the Atomic Energy Act (AEA), RCRA section 1004(41), 42 U.S.C. 6903 (63 FR 17414; April 9, 1998).

**Municipality:** A city, village, town, borough, county, parish, district, association, Indian tribe or authorized Indian tribal organization, designated and approved management agency under Section 208 of the Clean Water Act, or any other public body created by or under State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes.

**OAC:** Acronym for Ohio Administrative Code. Ohio's hazardous waste rules are located in Chapters 3745-49 to 3745-69 of the OAC and are equivalent to the federal rules located in 40 CFR Parts 260 to 270.

**Off-Site Facility:** A hazardous waste treatment, storage, or disposal area that is located at a place away from the generating site.

**Off- Specification Used Oil Burner:** A site where used oil not meeting the specification requirements in OAC rule 3745-279-11 (off-specification used oil) is burned for energy recovery in devices identified in 3745-279-61(A).

**Off-Specification Used Oil Fuel:** Used oil fuel that does not meet the specification provided under OAC rule 3745-279-11.

**OI Form:** Form for reporting Off-site Transporter and Receiving Facility Information by EPA ID.

**On-Site Facility:** A hazardous waste treatment, storage, or disposal area that is located on the generating site.

**On-Specification Used Oil Fuel:** Used oil fuel that meets the specification provided under OAC rule 3745-279-11.

**Operator:** The person responsible for the overall operation of a RCRA site. Note: This is the legal entity which controls the RCRA site operation rather than the plant or site manager. This is usually a company or business name, not an individual. **See Person.**

**Owner:** The person who owns a RCRA site or part of a RCRA site. Note: This includes the owner(s) of the building(s) and/or land. This may be an individual, company, or business name. **See Person.**

**Person:** An individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body.

**Process System:** For purposes of the Hazardous Waste Report, a process system refers to one or more units used together to treat, recover, or dispose of a hazardous waste. The process system begins at the unit where the hazardous waste first enters and consists of all other treatment, recovery, or disposal units downstream from the point of entry. Note that storage is not considered a process system for the purpose of PS Form completion. A list of management methods begins on page 86.

**Process Unit:** For purposes of the Hazardous Waste Report, a process unit refers to a single piece of equipment – e.g., one tank, one distillation column, or one surface impoundment – In which hazardous waste is treated, disposed, or recycled.

**PS Form:** Process Systems for Treatment, Disposal, or Recycling form. To be completed by facilities required to submit the WR.

**Resource Conservation and Recovery Act (RCRA):** The Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act (RCRA) (40 CFR 270.2). It is the Federal statute that regulates the generation, treatment, storage, disposal, recycling, and/or transportation of solid and hazardous waste.

**RCRA Permit:** A complete RCRA permit is comprised of an operating permit for hazardous waste treatment, storage, and disposal, and a corrective action permit addressing releases from solid waste management units. To apply for a permit, a site must file a two-part application (Part A and Part B). A facility is not considered to have a complete RCRA permit until both parts have been issued.

**RCRA Subtitle C Site:** The physical plant or location at which one or more of the following regulated waste activities occurs: the generation, transportation, treatment, storage, or disposal of hazardous wastes; recycling of hazardous wastes; United States importer of hazardous waste; mixed waste generator; exempt boiler and/or industrial furnace burning or processing hazardous waste; large quantity handler of or destination facility for universal wastes; disposing hazardous waste with an underground injection permit; the transportation (and temporary storage during transportation), processing/re-refining, burning, or marketing of used oil; eligible academic entity managing laboratory hazardous waste under the academic laboratory rules; or undergoing corrective action. A site may consist of several treatment, storage, or disposal operational units. For entities that only transport regulated wastes, the term site refers to the headquarters of that entity's operations.

**Reclamation:** The processing or regeneration of a material to recover a usable product. Examples are recovery of lead values from spent batteries and regeneration of spent solvents. See OAC rule 3745-51-01(C)(4).

**Recycling:** Use, reuse, or reclamation of a material (OAC rule 3745-51-01(C)(7)). A material is "used or reused" if it is either:

- Employed as an ingredient (including use as an intermediate) in an industrial process to make a product (e.g., distillation bottoms from one process used as feedstock in another process) (3745-51-01(C)(5)). However, a material will not satisfy this condition if distinct components of the material are recovered as separate end products (as when metals are recovered from metal-containing secondary material); or
- Employed in a particular function or application as an effective substitute for a commercial product (e.g., spent pickle liquor used as phosphorous precipitant and sludge conditioner in wastewater treatment).

**Residual:** The hazardous waste derived from the treatment, disposal, or recycling of a previously existing hazardous waste (e.g., the sludge remaining after initial wastewater treatment).

**Responsible Official:** A responsible official is defined in OAC rule 3745-50-42(A). Permit applications and reports must be signed as follows:

- For a corporation: By a responsible corporate officer. For the purpose of this rule, a "responsible corporate officer" means:
  - A president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy-making or decision-making functions for the corporation, or
  - The manager of one or more manufacturing, production, or operating facilities employing more than two hundred fifty persons or having gross annual sales or expenditures exceeding twenty-five million dollars (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- For a partnership or sole proprietorship: By a general partner or the proprietor, respectively; or
- For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of this rule, a principal executive officer of a federal agency includes the chief executive officer of the agency, or a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., regional administrator of U.S. EPA).

**Reverse Distributor:** A "Reverse Distributor" means any person that receives and accumulates prescription pharmaceuticals that are potentially creditable hazardous waste pharmaceuticals for the purpose of facilitating or verifying manufacturer credit. Any person, including forward distributors, third-party logistics providers, and pharmaceutical manufacturers, that processes prescription pharmaceuticals for the facilitation or verification of manufacturer credit is considered a reverse distributor. Notifying as a Reverse Distributor is part of the requirements in the Hazardous Waste Pharmaceutical Rule that Ohio EPA effective 10/5/2020.

**Sludge:** Any solid, semi-solid, or liquid waste generated from a municipal, commercial, or industrial wastewater treatment plant, water supply treatment plant, or air pollution control facility exclusive of the treated effluent from a wastewater treatment plant [OAC Rule 3745-50-10(A)(104)].

**Small Quantity Generator (SQG) of Hazardous Waste:** A generator that meets all the following criteria:

- Generates, in any calendar month, more than 100 kg (220 lbs.) but less than 1,000 kg (2,200 lbs.) of RCRA hazardous waste and
- Generates, in any calendar month, less than or equal to 1 kilogram (2.2 lbs) of acute hazardous waste listed in 3745-51-31 or 3745-51-33(E) of the Administrative Code; and
- Generates, in any calendar month, less than or equal to 100 kilograms (220 lbs) of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste listed in 3745-51-31 or 3745-51-33(E) of the Administrative Code.

**Small Quantity Handler of Universal Waste (SQHUW):** A universal waste handler (as defined in OAC rule 3745-273-09) who accumulates less than 5,000 kg (11,000 lbs) of universal wastes (batteries, pesticides, mercury-containing equipment, or lamps – calculated collectively) at any time. Notification to the Ohio EPA of this activity is optional.

**Small Quantity On-Site Burner Exemption:** The persons who burn small quantities of hazardous waste in an on-site boiler or industrial furnace, in accordance with OAC rule 3745-266-108, are conditionally exempt from regulation for that activity.

**Smelting, Melting, and Refining Furnace Exemption:** Under OAC rule 3745-266-100(C), owners or operators of smelting, melting, and refining furnaces that process hazardous wastes solely for metals recovery are conditionally exempt from regulation, except for 3745-266-101 and 3745-266-112, provided they comply with limited requirements set forth in 3745-266-100(C). Similarly, 3745-266-100(F) provides that owners or operators of smelting, melting and refining furnaces that process hazardous wastes for the recovery of precious metals are conditionally exempt from regulation, except for 3745-266-112 provided they comply with limited requirements specified in 3745-266-100(F).

**Solid Waste:** Any garbage, refuse, or sludge, or other materials not excluded under OAC rule 3745-51-04(A). Exclusions include, for example, domestic sewage and any mixture of other wastes that pass through a sewer system to a publicly owned treatment works (POTWs); industrial wastewater discharges that are point source discharges subject to regulation under the Clean Water Act; irrigation return flows; nuclear materials defined by the Atomic Energy Act; and in situ mining materials. Wastewaters being collected, stored, or treated before discharge and sludges generated by wastewater treatment are not excluded. Hazardous waste is defined as a subset of solid waste.

**Solvent:** A substance (usually liquid) capable of dissolving or dispersing one or more other substances. Solvents include, but are not limited to, the non-spent materials listed in EPA Hazardous Waste Codes F001 through F005.

**Source Code:** The production or service process associated with generation of waste.

**Source Material:** As defined by the Atomic Energy Act of 1954: (1) uranium, thorium, or any other material that is determined by the Commission pursuant to the provisions of Section 2091 of this title to be source material; or (2) ores containing one or more of the foregoing materials in such concentration as the Commission may by regulation determine from time to time.

**Source Reduction:** "Source Reduction" means any practice that: (1) reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, or disposal; and (2) reduces impact on public health and the environment associated with the release of such substances, pollutants, or contaminants. The term includes equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control. Source reduction does not include any practice that alters the physical, chemical, or biological characteristics or the volume of a hazardous substance, pollutant, or contaminant through a process or activity which itself is not integral to and necessary for the production of a product or the provision of a service.

**Special Nuclear Material:** As defined by the Atomic Energy Act of 1954: (1) plutonium, uranium enriched in the isotope 233 or in the isotope 235, and any other material which the Nuclear Regulatory Commission, pursuant to the provisions of Section 2071 of this title, determines to be special nuclear material, but does not include source material; or (2) any material artificially enriched by any of the foregoing, but does not include source material.

**Storage:** Temporary holding of hazardous waste until it is treated, disposed, or stored elsewhere. Storage methods include containers, tanks, waste piles, and surface impoundments [OAC Rule 3745-50-10(A)(122)].

**Superfund:** The program operated under the legislative authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendment Reauthorization Act (SARA) that funds and carries out the solid waste emergency and long-term removal remedial activities of U.S. EPA.

**Surface Impoundment:** A natural topographic depression, man-made excavation, or diked area formed primarily from earthen materials (although it may be lined with man-made materials) that is designed to accumulate liquid wastes or wastes containing free liquids, and that is not an injection well [OAC Rule 3745-50-10(A)(124)].

**Temporary Generator:** A site that was not a hazardous waste generator until a one-time, non-recurring, temporary event occurred that is not related to normal production processes. In other words, waste was generated from a particular activity for a limited time and the site then reverted back to a non-hazardous waste generator.

**Treatment, Storage, and Disposal Facility (TSD or TSDF):** A facility that treats, stores, or disposes of hazardous waste. A hazardous waste permit is required for these activities.

**Underground Injection Control (UIC):** The subsurface emplacement of fluids through a bored, drilled or driven well; or through a dug well, where the depth of the dug well is greater than the largest surface dimension. Underground injection wells are regulated under both the Safe Drinking Water Act and the Resource Conservation and Recovery Act (see 40 CFR Part 148). Hazardous wastes must be injected into a Class I well or, if authorized under a federal or state ground water remediation project, may be injected into a Class IV well. See [here](#) for more information.

**Unit:** See “Process Unit”.

**United States Importer:** Any person who imports hazardous waste from a foreign country into the United States. This does not include hazardous waste shipped from a foreign Department of Defense site, Maquiladora, United States territory or protectorate.

**Universal Waste:** Any of the following hazardous wastes that are managed under the universal waste requirements of OAC Chapter 3745-273, as defined in 3745-273-09: batteries, pesticides, mercury-containing equipment, lamps, aerosol cans, antifreeze, or paint and paint-related waste.

**Used Oil:** Any oil that has been refined from crude oil, or any synthetic oil, that has been used, and as a result of such use, is contaminated by physical or chemical impurities.

**Used Oil Fuel Marketer:** Any person who conducts either of the following activities:

- Directs a shipment of off-specification used oil from their site to an off-specification used oil burner; or
- First claims that used oil that is to be burned for energy recovery meets the used oil fuel specifications set forth in OAC rule 3745-279-11.

**Used Oil Management Activities:** For the purposes of the Site ID Form, includes used oil transportation; used oil processing and re-refining; burning off-specification used oil fuel; and used oil fuel marketing.

**Used Oil Processing:** Chemical or physical operations designed to produce from used oil, or to make used oil more amenable for production of, fuel oils, lubricants, or other used oil-derived products. Processing includes but is not limited to: blending used oil with virgin



petroleum products, blending used oils to meet the fuel specification, filtration, simple distillation, chemical or physical separation, and re-refining.

**Used Oil Processor:** A site that processes on-specification or off-specification used oil.

**Used Oil Re-Refiner:** A site that produces lubricating oils and greases, industrial fuel, asphalt extender, gasoline, and other products from on-specification or off-specification used oil.

**Used Oil Transfer Facility:** Any transportation-related facility, including loading docks, parking areas, storage areas, and other areas where shipments of used oil are held for more than 24 hours during the normal course of transportation and not longer than 35 days. Transfer facilities that store used oil for more than 35 days are subject to regulation under OAC rules 3745-279-50 through 3745-279-59.

**Used Oil Transporter:** Any person who transports used oil, or who collects used oil from more than one generator and transports the collected oil, and owners and operators of used oil transfer facilities. Used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation but, with the following exception, may not process used oil. Used oil transporters may conduct incidental processing operations that occur in the normal course of used oil transportation (e.g., settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil-derived products or used oil fuel.

**Very Small Quantity Generator (VSQG) of Hazardous Waste:** A “very small quantity generator” means a generator who generates less than or equal to all of the following amounts in a calendar month:

- One hundred kilograms (two hundred and twenty lbs) of non-acute hazardous waste
- One kilogram (2.2 lbs) of acute hazardous waste listed in rules 3745-51-31 or paragraph (E) of rule 3745-51-33 of the Administrative Code
- One hundred kilograms (two hundred and twenty lbs) of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste listed in rules 3745-51-31 or paragraph (E) of rule 3745-51-33 of the Administrative Code.

This term is synonymous with “conditionally exempt small quantity generator”. The name change occurred when Ohio EPA adopted the Generator Improvements Rule package, effective 10/5/2020.

**Waste Minimization:** The reduction, to the extent feasible, of hazardous waste that is generated or subsequently treated, stored, or disposed. It includes any source reduction or recycling activity undertaken by a generator that results in: (1) the reduction of total volume or quantity of hazardous waste; (2) the reduction of toxicity of hazardous waste; or (3) both,



as long as the reduction is consistent with the goal of minimizing present and future threats to human health and the environment.

**Waste Minimization Code:** A code that corresponds to waste minimization, recycling, or pollution prevention efforts implemented or continuing during this reporting year to reduce the volume and toxicity of a hazardous waste reported on a GM Form. The waste minimization activity being reported must have occurred during the reporting cycle.

**WR Form:** Waste Received from Off-Site Form

## SOURCE CODES

<b>Source of Generation</b>	
<b>G01</b>	Dip, flush or spray rinsing
<b>G02</b>	Stripping and acid or caustic cleaning
<b>G03</b>	Plating and phosphating
<b>G04</b>	Etching
<b>G05</b>	Metal forming and treatment (pickling, heat treating, etc.)
<b>G06</b>	Painting and coating
<b>G07</b>	Product and by-product processing
<b>G08</b>	Removal of spent process liquids or catalysts
<b>G09</b>	Other production or service-related processes from which the waste is a direct outflow or result (specify in comments)
<b>Other Intermittent Events or Processes</b>	
<b>G11</b>	Discarding off-specification, out-of-date, and/or unused chemicals or products
<b>G12</b>	Lagoon or sediment dragout and leachate collection
<b>G13</b>	Cleaning out process equipment
<b>G14</b>	Removal of tank sludge, sediments or slag
<b>G15</b>	Process equipment change-out or discontinuation of equipment use
<b>G16</b>	Oil changes and filter or battery replacement
<b>G17</b>	Academic lab clean-out under OAC rule 3745-52-213
<b>G19</b>	Other one-time or intermittent processes (specify in comments)
<b>Pollution Control and Waste Management Process Residuals</b>	
<b>G21</b>	Air pollution control devices (baghouse dust, etc.)
<b>G22</b>	Laboratory analytical wastes (used chemicals)
<b>G23</b>	Wastewater treatment (sludge, filter cake, etc.)
<b>G24</b>	Solvent or product distillation as part of a production process (including totally enclosed treatment systems). Does not include batch treatment in a separate process.
<b>G25</b>	Treatment, disposal, recycling of hazardous wastes- indicate the management method that produced the residuals in Section 1.C. of the GM Form
<b>G26</b>	Leachate collection (from landfill operations or other land units)

<b>G27</b>	Treatment or recovery of universal waste
<b>Spills and Accidental Releases</b>	
<b>G31</b>	Accidental contamination of products, materials or containers
<b>G32</b>	Cleanup of spill residues
<b>G33</b>	Leak collection and floor sweeping
<b>G39</b>	Other cleanup of current contamination (specify in comments)
<b>Remediation of Past Contamination</b>	
<b>G41</b>	Closure of hazardous waste management unit under RCRA
<b>G42</b>	Corrective action at a solid waste management unit under RCRA
<b>G43</b>	Remedial action or emergency response under Superfund
<b>G44</b>	State-program or voluntary cleanup
<b>G45</b>	Underground storage tank cleanup
<b>G49</b>	Other remediation (specify in comments)
<b>Waste Received by an LQG from VSQGs Under the Control of the Same Person</b>	
<b>G51</b>	Hazardous wastes received by an LQG from VSQGs under the control of the same person
<b>Other</b>	
<b>G61</b>	Hazardous waste received from off-site for storage/bulking and transfer off-site for treatment or disposal
<b>G76</b>	Evaluated hazardous waste pharmaceuticals accumulated by a reverse distributor
<b>G77</b>	Airbag waste received from airbag waste handlers exempted under OAC 3745-51-04(J) prior to arrival at the airbag collection facility or designated facility

## WASTE FORM CODES

<b>Mixed Media/ Debris/ Devices-</b> Waste that is a mixture of organic and inorganic wastes, liquid and solid wastes, or devices that are not easily categorizable	
<b>W001</b>	Lab packs with no acute hazardous waste
<b>W002</b>	Contaminated debris: paper, clothing, rags, wood, empty fiber or plastic containers, glass, piping, other solids
<b>W004</b>	Lab packs containing acute hazardous waste
<b>W005</b>	Waste pharmaceuticals managed as hazardous waste
<b>W006</b>	Airbag waste (airbag modules or airbag inflators managed as HW)
<b>W301</b>	Contaminated soil
<b>W309</b>	Batteries, battery parts, cores, casings
<b>W310</b>	Filters, solid absorbents, ion exchange resins and spent carbon
<b>W320</b>	Electrical devices (lamps, thermostats, CRTs, etc.)
<b>W512</b>	Sediment or lagoon dragout, drilling or other muds
<b>W801</b>	Compressed gases
<b>Inorganic Liquids-</b> Waste that is primarily inorganic and highly fluid (e.g., aqueous), with low suspended inorganic solids and low organic content	
<b>W101</b>	Very dilute aqueous waste containing more than 99% water
<b>W103</b>	Spent concentrated acid
<b>W105</b>	Acidic aqueous wastes less than 5% acid
<b>W107</b>	Aqueous waste containing cyanides
<b>W110</b>	Caustic aqueous waste without cyanides
<b>W113</b>	Other aqueous waste or wastewaters
<b>W117</b>	Waste liquid mercury
<b>W119</b>	Other inorganic liquid (specify in comments)
<b>Organic Liquids-</b> Waste that is primarily organic and is highly fluid, with low inorganic solids content and low-to-moderate water content	
<b>W200</b>	Still bottoms in liquid form
<b>W202</b>	Concentrated halogenated (chlorinated) solvent
<b>W203</b>	Concentrated non-halogenated (non-chlorinated) solvent
<b>W204</b>	Concentrated halogenated/ non-halogenated solvent mixture
<b>W205</b>	Oil-water emulsion or mixture
<b>W206</b>	Waste oil managed as hazardous waste

<b>W209</b>	Paint, ink, lacquer, or varnish
<b>W210</b>	Reactive or polymerizable organic liquids and adhesives
<b>W211</b>	Paint thinner or petroleum distillates
<b>W219</b>	Other organic liquid (specify in comments)
<b>Inorganic Solids-</b> Waste that is primarily inorganic and solid, with low organic content and low-to-moderate water content; not pumpable	
<b>W303</b>	Ash
<b>W304</b>	Slags, drosses, and other solid thermal residues
<b>W307</b>	Metal scale, filings and scrap (including metal drums)
<b>W312</b>	Cyanide or metal cyanide bearing solids, salts or chemicals
<b>W316</b>	Metal salts or chemicals not containing cyanides
<b>W316</b>	Other inorganic solids (specify in comments)
<b>Organic Solids-</b> Waste that is primarily organic and solid, with low-to- moderate inorganic content and water content; not pumpable	
<b>W401</b>	Pesticide solids
<b>W403</b>	Solid resins, plastics or polymerized organics
<b>W405</b>	Explosives or reactive organic solids
<b>W406</b>	Dried paint (paint chips, filters, air filters, other)
<b>W409</b>	Other organic solids (specify in comments)
<b>Inorganic Sludges-</b> Waste that is primarily inorganic, with moderate-to-high water content and low organic content; mostly pumpable	
<b>W501</b>	Lime and/or metal hydroxide sludges and solids with no cyanides
<b>W503</b>	Gypsum sludges from wastewater treatment or air pollution control
<b>W504</b>	Other sludges from wastewater treatment or air pollution control
<b>W505</b>	Metal bearing sludges (including plating sludge) not containing cyanides
<b>W506</b>	Cyanide-bearing sludges
<b>W519</b>	Other inorganic sludges (specify in comments)
<b>Organic Sludges-</b> Waste that is primarily organic with low-to-moderate inorganic solids content and water content; pumpable	
<b>W603</b>	Oily sludge
<b>W604</b>	Paint or ink sludges, still bottoms in sludge form
<b>W606</b>	Resins, tars, polymer or tarry sludge
<b>W609</b>	Other organic sludge (specify in comments)

## MANAGEMENT METHOD CODES

<b>Reclamation and Recovery</b>	
<b>H010</b>	Metals recovery including retorting, smelting, chemical, etc.
<b>H011</b>	Mercury recovery
<b>H015</b>	Deployment/ deactivation of airbag waste followed by metals recovery
<b>H020</b>	Solvents recovery
<b>H039</b>	Other recovery or reclamation for reuse including acid regeneration, organics recovery, etc. (specify in comments)
<b>H050</b>	Energy recovery at this site - use as fuel (includes on-site fuel blending)
<b>H061</b>	Fuel blending prior to energy recovery at another site
<b>Destruction or Treatment Prior to Disposal at Another Site</b>	
<b>H040</b>	Incineration - thermal destruction other than use as a fuel
<b>H041</b>	Open burning/ open detonation (permitted under Subpart X with process code X01)
<b>H042</b>	Open burning/open detonation (should be permitted under Subpart X with process code X01)
<b>H070</b>	Chemical reduction with or without precipitation
<b>H081</b>	Biological treatment with or without precipitation
<b>H090</b>	Polymerization (LDR standard as treatment method)
<b>H100</b>	Physical treatment only
<b>H110</b>	Stabilization prior to a land disposal at another site
<b>H113</b>	Stabilization to remove hazardous waste characteristics or to achieve delisting levels
<b>H120</b>	Combination of chemical, biological, and/or physical treatment; do not include immediate treatment in an exempted wastewater treatment unit with discharge to a NPDES-POTW
<b>H121</b>	Neutralization only
<b>H122</b>	Evaporation
<b>H129</b>	Other treatment (specify in comments)
<b>Disposal</b>	
<b>H130</b>	Surface Impoundment that will be closed as a landfill (with prior treatment and/or stabilization meeting LDR treatment standard)
<b>H131</b>	Land treatment or application (to include on-site treatment and/or stabilization)

<b>H132</b>	Landfill or surface impoundment that will be closed as landfill (to include on-site treatment and/or stabilization)
<b>H134</b>	Deepwell or underground injection (with or without treatment)
<b>H136</b>	Discharge to sewer/POTW (with prior storage – with or without treatment)
<b>H137</b>	Discharge to NPDES permit (with prior storage – with or without treatment)
<b>Transfer Off-Site</b>	
<b>H141</b>	Storage, bulking, and/or transfer off-site - no treatment (H040-H129), fuel blending (H061), or disposal (H131-H135) at this site

## **FC ID Numbers Assigned to Waste Handlers in Foreign Countries**

When reporting a generator, transporter, or receiving facility based in a foreign country follow the “FC” ID convention for sites in foreign countries per U.S. EPA’s Hazardous Waste Report policy. The FC IDs have no meaning for any purpose other than tracking hazardous waste handlers within DERR’s Hazardous Waste Report database; they are not used on manifests. An Ohio EPA-assigned “FC” number begins with the FC prefix and is followed by a string of ten digits assigned in numerical order to facilities and transporters on a first come first serve basis. To maintain historical consistency, these same ID numbers have been used for individual handlers since the 1993 HW Report cycle. The handler may have a RCRA ID number assigned by a state such as Michigan or New York, but because these start with a state code they cannot be used in Ohio’s Hazardous Waste Report database because they conflict with the actual foreign location address information.

You can find a list of the foreign receivers included in the [National List](#) of Treatment, Storage and Disposal or Receiving Facilities and their management method codes maintained on the Hazardous Waste Reporting web page.

Foreign transporters that have been assigned FC IDs are listed below. If you need to report a company that cannot be found on the list below or in the spreadsheet at the link in the previous paragraph, please contact the HW Report support staff in DERR to request a FC ID assignment.



## Foreign Transporters with FC ID Numbers

FC ID	Name	Address	City
FC0000000004	Clean Harbors	4090 Telfer Rd	Corunna, Ontario
FC0000000032	Laidlaw Carriers	1179 Ridgeway Road	Woodstock, Ontario
FC0000000055	Harold Marcus Ltd	Hwy 2 West	Bothwell, Ontario
FC0000000070	Clean Harbors	551 Avonhead Road	Mississauga, Ontario
FC0000000071	Clean Harbors	1790 Ironstone Dr	Burlington, Ontario
FC0000000072	Transport Rollex	910 Boule Lionel-Boulet	Varennes, Quebec
FC0000000083	Fortress Trucking	280 Woolrich St	Breslau, Ontario
FC0000000091	RPR Environmental	164-166 S Service Rd	Stoney Creek, Ontario
FC0000000149	Transport Sylvester & Forget Inc	320 Route 201	St Stanislas de Kosta, Quebec
FC0000000152	Transport Guilbault Canada Inc	435 Rue Faraday	Quebec City, Quebec
FC0000000153	Challenger Motor Freight Inc	300 Maple Grove Rd	Cambridge, Ontario
FC0000000154	Transport Grayson Inc	1193 Rte 116	Danville, Quebec
FC0000000155	Laidlaw Carriers	45 Kerr Crescent	Guelph, Ontario
FC0000000156	Laidlaw Carriers Bulk GP Inc	240 Universal Dr	Woodstock, Ontario
FC0000000157	Trans2D Logistics Inc	8801 Trans-Canada Hwy Suite 500	Saint-Laurent, Quebec