

General Reporting Technique and Philosophy for the 2011 Biennial Hazardous Waste Report

Receipt Control:

If you have not received a reporting package from DEP by January 1, 2012: call the Biennial Hazardous Waste Report Coordinator for the Hazardous Waste Management Section at (850)-245-8748. Because EPA is trying to save paper, paper forms will no longer be mailed out automatically but may be obtained as PDF files on our website. If you reported in 2009 or you are correctly listed as an LQG notifier from your form 8700-12 or form 8700-12FL, you should automatically receive the report package. If not, call us to be included in our mailing list. All forms/disks must be completed and mailed by **February 29, 2012**. A 1 month extension may be granted upon receipt of a letter requesting an extension before February 29, 2012, and for sites submitting data electronically (using the BRState software). Data submitted electronically must pass the error checks (not necessarily warnings) in the software before submission. Data submitted on paper must pass the same error checks in the software before the submission is considered to be complete. Data entered in the software may be printed to facsimiles of the original paper forms for record keeping, comparison, or supplementary submission, if so desired.

Data Collection:

Any hazardous waste stream should be measured as it is generated, treated, or received. Totals of the amounts generated, treated, or received, by waste stream (1 form code + origin code, or a distinct stream) should be tracked monthly. A total of all hazardous waste (converted to a common unit of measure (tons)) generated per month should be computed to determine whether your site is required to report in the reporting year (odd numbered year). Determine in advance what source code and form code you will use to report this waste by and include these codes in the monthly records of generation or on the manifest copies you will use to prepare the report. There may be multiple source codes for this waste, but choose the best one to report with, unless you would prefer to report by source as well. (I would prefer one source code per page if possible, unless wastes from many sources are mixed before shipment or treatment). If either the monthly totals are kept by codes, or codes are included in the manifests, the report preparation should be a lot easier at the end of the year. No new codes will be used on the 2011 report.

Any management should be thought of as a combined system, choosing a single management code that best describes the entire system (not unit). Pick a close one rather than using "other" or "unknown", and try to describe the most important or final treatment step if the entire system is not listed. **USE THE SAME MANAGEMENT CODE ON EACH AND EVERY FORM THAT REFERENCES THE SAME SYSTEM.** Each waste connected with a management should include a separate form GM for the RCRA influent, RCRA liquid effluent (except for POTW/NPDES), and RCRA solids or sludges.

All Forms:

The intent of the forms is to track any RCRA hazardous waste within your facility from inception (primary or secondary generation or receipt from off-site) through any on-site treatment (possibly generating new secondary RCRA waste streams) to final resolution (treatment with no RCRA outflow, shipment off-site, or disposal). A form **GM** is created to describe each RCRA waste generated on-site from a production process, receipt from off-site, cleanup, or treatment; and to show where this particular waste goes next. Any by-products of the treatment, which are new RCRA wastes will require a new form GM. Form **WR** describes any RCRA waste received by you and where this waste goes within your site: storage for re-shipment (form GM required) or treatment on-site. Do not leave any spaces blank on the forms and do not use any codes to say you don't know something. If you don't know, call me and ask. If the space does not apply to you, either put N/A or a dash in the space to let me know you didn't mistakenly omit the entry. The software will not let you make these mistakes and doesn't require the N/A or dashes. If you need to estimate, estimate, but make sure the estimates are accurate enough to satisfy your inspector when he comes to check your work. An estimate is a measurement you forgot to make this time and will remember next time. If you can find a code that is at all close to what you mean, please use it, otherwise, use the comment section. Please begin numbering each new form type (GM,WR,OI) with page 1 (**example** [1 report on paper]: form IC; pages = 1,2 forms GM; pages =1,2,3,4,5,6 forms OI; pages =1(sites 12345) ,2(sites 123)). The software automatically numbers the pages correctly.

Form SI:

This new 3-page form must be submitted on paper with the original signature of the company official who takes responsibility for this report, and the date of that signature. If you want to submit a subsequent notification of hazardous waste activity, please use the separate Florida form 8700-12FL. Please be sure to check the boxes in section 1 indicating that this submittal provides subsequent notification (as a component of the Hazardous Waste report). **Make sure you sign and date this form.**

Form GM:

Any time you have a waste that acts different (caustic, acid, flammable, toxic, organic/inorganic), feels different (solid, liquid, gas, sludge), comes from a different origin type (production, cleanup, treatment, or off-site), or just seems like an entirely different waste stream, report it on a separate form GM. Describe it as well as possible using **section 1**. If the Source code is "G25", there must be a Management code in Sec. I box E. that SHOULD match the management code on a separate form GM Sec II box D. to show where the waste came from. Leave the system type on form GM Sec I box E. blank (or N/A) unless the Source code is "G25". Tell us how much of this waste stream was generated (0 if the source code = G6x or this is a leachate contaminated groundwater). If the Unit Of Measure is 5, 6, or 7: the Density and Density type are required.

If any was treated on-site, tell us in **section 2** how much was treated on-site **in this year**. If any waste was treated on-site there should probably be other form(s) GM describing any RCRA hazardous waste(s) that came out of these system(s) with the same management code(s) (H___) as are listed in section 2 of this form GM. Whenever you change the waste by treating it, you have a new waste to be reported in a new form GM.

EXAMPLE: If you have a caustic waste and an acid waste with chrome that are mixed and precipitated: you should have 2 form **GMs**: (W110 for aqueous caustics, W103 for acids with metals, Sec II.D = "H071" for both) ; and 1 form **GM** for the sludge (if RCRA) shipped off-site , treated further, or disposed. If the liquid effluent is exempt from RCRA because it goes DIRECTLY to POTW or NPDES, but would be RCRA otherwise, DO NOT REPORT THIS WASTE but do report any sludges or effluents shipped off-site.

Tell us in **section 3**: was any of this waste stream sent off-site for treatment, and how much was sent to what facility **in this year** and how that facility handled the waste (not the final disposition). If you sent waste to a facility that collects and stores waste (no treatment or fuel blending on-site) for shipment to another location for treatment or disposal, the system type code is H141. When you receive your final copy of the manifest from the TSDF, the system type code (H___) should be on the manifest in box K. for each waste stream. There may be a different type of treatment code in box K. (T51, S01, D01, etc.). This code may be translated into an H___ code by looking up the possible H___ codes that correspond to this code using the software, or use the included table to find the H___ codes corresponding to this code.

If any treatment or pre-treatment has any **RCRA liquid effluent** and/or **sludge**, you must show us on a separate form GM what happened to this new RCRA waste (shipped off-site or treated in another system), or we will have to assume you dumped it in the backyard (not a good thing).

EXAMPLE: If you create 1 GM form with a form code of W110 (caustics)(total 800 tons) that was treated on-site with a management code of H121(neutralization only), and you generated 50 tons of W104(acids) waste on a separate form GM that was treated on-site by the same management (code H121) : then you should have additional form(s) GM if the Effluent or Sludge from the H121 system is RCRA hazardous at the point where it leaves the system (do not report the waste if it was treated by a system regulated by NPDES (including POTW) where no RCRA regulated storage is involved).

EXAMPLE: If you generate one waste with a form code of W110 (caustics)(total 800 tons) that was treated on-site in a neutralization only treatment system regulated by POTW or NPDES, DO NOT REPORT THIS WASTE. You should have a form GM if the Effluent or Sludge from this system is RCRA hazardous at the point where it leaves the system. You should report the RCRA sludge with a source code = G23.

Form OI: (Form OI is **NO LONGER REQUIRED** by the State of Florida for any sites required to submit a Biennial Hazardous Waste Report)

Form WR: (TSDR or Transfer facilities only)

If you received any RCRA hazardous waste from off-site in 2011 you must fill out 1 form WR per generator site, per form code, per management. Add up all waste received for this year by management and add this total to any waste generated on form GM that was treated on-site (Sec II, box D) in the same system to match the influent of the system.. If the Management Code on form(s) WR is **H141** (transfer/storage) then you must create form(s) GM by form code with the GM Source Code = G61 to show where the waste was shipped to(in GM Sec 3). . If you are going to mix wastes of different form codes in storage before shipping (without fuel blending H061), form GM should separate out the totals for shipment by form code before mixing.

EXAMPLE: If generator FLD000000001 shipped you 500 pounds of W001 waste in 5 shipments and 700 pounds of W203 waste in 8 shipments (some shipments contained W001 and W203) some to be treated by H141(storage and re-shipment) and some by H020 (solvents recovery) then there should be from 2 to 4 form **WR**'s created, separated by form code and management code; 1-2 form(s) **GM** for the H141, separated by form code; and probably at least 1 more form GM to handle the RCRA Effluent or Sludge from the H020 system which is not a product.

EXAMPLE: If you create 10 **WR** forms with a form code of W200 (total 1800 pounds) and 12 **WR** forms with a form code of W202 (total 700 pounds), all with a management code of H141, and you generated 100 pounds of W200 waste on-site: then you should have 1 form **GM** with origin code = 1, quantity = 100, form code = W200; 1 form **GM** with origin code = 4, quantity = 1800, form code = W200; and 1 form **GM** with origin code = 4, quantity = 700, form code = W202. If the W200 and W202 are mixed in the same tank before shipping - report the same way: you may report shipped quantities by assuming that the shipped proportions = the yearly mixture proportions.

EXAMPLE: If you create 5 **WR** forms(total 8000 pounds) with a form code of W101 with management code of H039 (recovery) and you generated 50 tons of W101 waste on a form **GM** that was treated on-site with a management code of H039 : then you should probably at least 1 more form GM to handle the RCRA Effluent or Sludge from the H039 system .

The EPA forms and instructions package may be downloaded from:

<http://www.epa.gov/epaoswer/hazwaste/data/index.htm>

The Florida Software may be downloaded from:

http://www.dep.state.fl.us/waste/categories/hazardous/pages/BRS_data.htm

The Waste Reporter BR data entry software may be downloaded from:

<http://www.environ.com/partners/Florida/FloridaWR.htm>

**40 CFR 265 (Appendix II) Handling Codes for Treatment/Storage/Disposal Methods
(Manifested Wastes) And the corresponding BRS codes**

Manifest Code	Description	Possible BRS Codes	Manifest Code	Description	Possible BRS Codes
S01-S05 <u>STORAGE</u>			T06-T77 <u>TREATMENT</u>		
S01	CONTAINER (BARREL, DRUM) STORAGE	H141	PHYSICAL TREATMENT		
S02	TANK STORAGE	H141	T43	FOAMING	H123
S03	WASTE PILE STORAGE	H141	T44	SEDIMENTATION	H123
S04	SURFACE IMPOUNDMENT STORAGE	H141	T45	THICKENING	H123
S05	OTHER STORAGE	H141	T46	ULTRAFILTRATION	H124
			T47	OTHER PHYSICAL SEPARATION	H124
T06-T77 <u>TREATMENT</u>					
THERMAL TREATMENT					
T06	LIQUID INJECTION INCINERATOR	H040	PHYSICAL COMPONENT REMOVAL		
T07	ROTARY KILN INCINERATOR	H040	T48	ABSORPTION-MOLECULAR SIEVE	H082
T08	FLUIDIZED BED INCINERATOR	H040	T49	ACTIVATED CARBON	H082
T09	MULTIPLE HEARTH INCINERATOR	H040	T50	BLENDING	H061
T10	INFRARED FURNACE INCINERATOR	H040	T51	CATALYSIS	H077
T11	MOLTEN SALT DESTRUCTOR	H040	T52	CRYSTALLIZATION	H129
T12	PYROLYSIS	H040	T53	DIALYSIS	H129
T13	WET AIR OXIDATION	H076	T54	DISTILLATION	H020, H122, H129
T14	CALCINATION	H010	T55	ELECTRODIALYSIS	H129
T15	MICROWAVE DISCHARGE	H040	T56	ELECTROLYSIS	H129
T16	CEMENT KILN	H050	T57	EVAPORATION	H122
T17	LIME KILN	H050	T58	HIGH GRADIENT MAGNETIC SEPARATION	H010, H124, H129
T18	OTHER THERMAL TREATMENT	H010	T59	LEACHING	H010, H101
			T60	LIQUID ION EXCHANGE	H010, H111
CHEMICAL TREATMENT			T61	LIQUID-LIQUID EXTRACTION	H129
T19	ABSORPTION MOUND	H103	T62	REVERSE OSMOSIS	H010, H129
T20	ABSORPTION FIELD	H103	T63	SOLVENT RECOVERY	H020
T21	CHEMICAL FIXATION	H111	T64	STRIPPING	H083
T22	CHEMICAL OXIDATION	H075	T65	SAND FILTER	H124
T23	CHEMICAL PRECIPITATION	H077	T66	OTHER PHYSICAL COMPONENT REMOVAL	H129
T24	CHEMICAL REDUCTION	H071	BIOLOGICAL TREATMENT		
T25	CHLORINATION	H075	T67	ACTIVATED SLUDGE	H101
T26	CHLORINOLYSIS	H075	T68	AEROBIC LAGOON	H081
T27	CYANIDE DESTRUCTION	H073	T69	AEROBIC TANK	H081
T28	DEGRADATION	H129	T70	ANAEROBIC LAGOON	H081
T29	DETOXIFICATION	H129	T71	COMPOSTING	H081
T30	ION EXCHANGE	H010, H129	T72	SEPTIC TANK	H132
T31	NEUTRALIZATION	H121	T73	SPRAY IRRIGATION	H131
T32	OZONATION	H129	T74	THICKENING FILTER	H081
T33	PHOTOLYSIS	H129	T75	TRICKING FILTER	H081
T34	OTHER CHEMICAL TREATMENT	H129	T76	WASTE STABILIZATION POND	H081, H111, H132
PHYSICAL TREATMENT			T77	OTHER BIOLOGICAL TRTREATMENT	H081
PHYSICAL SEPARATION OF COMPONENTS			T78	reserved	
T35	CENTRIFUGATION	H124	T79	reserved	
T36	CLARIFICATION	H123	D80-D83 <u>DISPOSAL</u>		
T37	COAGULATION	H124	D80	UNDERGROUND INJECTION	H134
T38	DECANTING	H124	D81	LANDFILL	H132
T39	ENCAPSULATION	H112	D82	LAND TREATMENT	H131
T40	FILTRATION	H123	D83	OCEAN DISPOSAL	H129
T41	FLOCCULATION	H123			
T42	FLOTATION	H124			