MDE

MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230
410-537-3000 • 1-800-633-6101 • www.mde.maryland.gov

Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Grumbles
Secretary

January 4, 2016

Dear Sir/Madam:

The State of Maryland and Federal Environmental Protection Agency (EPA) hazardous waste regulations establish reporting requirements for persons who manage hazardous waste. The Biennial Report (BR) covers the waste management during odd calendar years.

Code of Maryland Regulations (COMAR) 26.13.03.06B requires persons to file a report if, at a given site, they:

(1) Either:
- (a) generate hazardous waste and ship it off-site to a facility within the United States; or
- (b) treat, store or dispose of hazardous waste on-site; and

(2) Are fully regulated under Maryland's hazardous waste regulations by:
- (a) generating, in a calendar month, 220 pounds or more of hazardous waste, or more than 2.2 pounds of acute hazardous waste; or
- (b) **accumulating**, at any time, more than 220 pounds of hazardous waste or more than 2.2 pounds of acute hazardous waste.

Our records indicate that your facility meets at least one of the above reporting criteria. The completed report must cover all hazardous waste activity only for the calendar year ending December 31, 2015.

Maryland Department of the Environment encourages generators to submit their 2015 Hazardous Waste Report electronically. Please go to www.arminc.net and click on Easitrak 2015 to start the process. Since this is a new database old reports will not be available to replicate. Generators will have to register. There are no fees associated with this database. When completed be sure to submit your report, print the verification, sign the verification and mail to the Department.

The completed report is to be filed with the:
Maryland Department of the Environment
Land Management Administration
Technical Services & Operations Program
1800 Washington Boulevard, Suite 650
Baltimore Maryland 21230-1719

The deadline for filing is March 1, 2016.

If you need instructions on the forms or if you choose to submit hard copy, the actual report instructions/forms are available on EPA's website:
http://www2.epa.gov/hwgenerators/2015-hazardous-waste-report-instructions-and-form

Maryland does NOT require the filing of form OI. **Note, however, that Maryland's reporting requirement is more stringent than the federal reporting requirement. For the purposes of the instruction manual, consider yourself as "required to file" if you meet the criteria listed above. Ignore the instructions on page 3 and 4 that limit reporting to federally-defined large quantity generators.**

Information on the reporting of the generation and treatment of wastewaters can be found under "WASTES NOT TO BE REPORTED" on page 36 of the instruction manual. Also take note of the enclosed documents identifying additional Maryland-regulated wastes that must be included in the report, and providing information on waste minimization/pollution prevention.

If you have any questions or need assistance, you may contact Paul "Brian" Sodeman at 410-537-3397 or by email at paul.sodeman@maryland.gov or Section Head, Jennifer Hopper at 410-537-3350 or by email at jennifer.hopper@maryland.gov.

Additional information including frequently asked questions and key points are available on the Department's website:
http://mde.maryland.gov/programs/Land/HazardousWaste/BiennialHazardousWasteReport/Pages/Programs/LandPrograms/Hazardous_Waste/biennialreport/index.aspx

Failure to return an accurate and complete hazardous waste report by **March 1, 2016** is a violation of Maryland and federal regulations and may result in you being subjected to administrative, civil and/or criminal penalties.

If you believe you have received this notification in error, please submit a letter on company letter head explaining why you feel that you received this notification in error and include the RCRA Subtitle C Site Identification Form (8700-12), indicating that the reason for submittal is to provide Subsequent Notification of Regulated Waste Activity (to update site identification information).

Sincerely,

Cynthia Keller

Cynthia Keller, Program Manager
Technical Services and Operations Program

Enclosures