



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

January 8, 2017

Dear Sir/Madam:

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

Note: EPA only requires Large Quantity Generators (13.2 tons or more) to report. However, Maryland has more stringent requirements.

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

- (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, 2017.

Maryland Department of the Environment (the Department) encourages generators to submit their 2017 Hazardous Waste Report electronically. Please go to www.arminc.net and click on Easitrak 2017 to start the process. You must register regardless of whether you registered during 2015 cycle or not. There are no fees associated with this database.

When completed be sure to **submit** your report, **print** the "Declaration of Electronic Filing of Annual Hazardous Waste Report", **sign** the declaration and **mail** to the Department. Instructions on using Easitrak are included with this packet.

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

The deadline for filing is March 1, 2018.

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 RCRAInfo public website:

<https://rcrainfo.epa.gov/rcrainfoweb/action/main-menu/view>

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 44 and 45 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 50 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, is available on the Department's website:
<http://mde.maryland.gov/programs/LAND/HazardousWaste/Pages/biennialreport.aspx>

Failure to return an accurate and complete hazardous waste report by **March 1, 2018** 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, are no longer in business, are no longer generating hazardous waste or believe you need not report for other reasons, please complete the RCRA Subtitle C Site Identification Form (8700-12) and explain why you feel that you received this notification in error in the comment section prior to signature. Mail hard copy to the Department.

Sincerely,

Cynthia Keller, Program Manager
Technical Services and Operations Program

Enclosures