

**TITLE:** Hazardous Waste Reporting Requirements for the Off-Site Shipment of Hazardous Waste at VAP Properties

**DATE EFFECTIVE:** January 2005

**HISTORY:** Update to VA30015.05.001 - Revision was necessary to reflect changes in the rule citations that became effective in March 2009. Website hyperlink updated in 2014.

**KEYWORDS:** Hazardous waste reporting requirements; disposal; remediation; dig and haul

**RULE/ AUTHORITY:** OAC 3745-300-11(B), OAC 3745-52-41, and OAC 3745-52-34(A)

**QUESTION:** What are the hazardous waste reporting requirements for shipment of hazardous waste (e.g., contaminated soil that is either characteristically hazardous or contains a listed hazardous waste) off-site at VAP properties?

**ANSWER:** When completing remedial activities under the VAP, you must comply with other applicable regulations, rules, etc. of other divisions or agencies. OAC 3745-300-11(B) requires all remedies conducted under the VAP to be completed in compliance with all applicable laws, regulations, rules, resolutions, and ordinances.

One such requirement is the filing of a hazardous waste annual report. Whenever the volunteer either generates 1000 kg of hazardous waste in a month or is otherwise subject to OAC 3745-52-34(A) **and** ships the hazardous waste off-site, they must comply with the annual reporting requirements found in OAC 3745-52-41. Examples of typical hazardous wastes at VAP sites may include contaminated media (e.g., soil and groundwater) spent filter media (wastewater treatment sludge, spent carbon units), contaminated personal protective equipment and hazardous wastewater. Information regarding how to file an annual report can be found at <http://epa.ohio.gov/dmwm/Home/HWAnnualReportProgram.aspx> You can also call the Division of Materials Waste Management (DMWM) at (614) 644-2621 and ask to speak to an Environmental Specialist about annual report information.

In addition, treatment, storage, and disposal (TSD) facilities receiving the waste are also required to file annual reports in Ohio (biennial in most other states) regarding hazardous waste received from off-site. Ohio EPA-DMWM uses this information to cross check and make sure

that all generators of hazardous waste who should have filed an annual report did so. Therefore, if the remedy resulted in the generation of hazardous waste subject to these reporting requirements and an annual report is not filed, the volunteer will likely receive a Notice of Violation from Ohio EPA. Volunteers are reminded to always comply with the rules and regulations of other divisions or agencies when completing remedial activities at a VAP property.

**OHIO EPA**  
**CONTACT:**

For any questions concerning this issue, please contact the VAP central office at (614) 644-2924.