

2009 BRS FREQUENTLY ASKED QUESTIONS

1. I didn't get a notice or reminder letter; do I still have to submit a BRS report? ***Yes, if you have an active EPA ID number or generated hazardous waste at the SQG level or above you must file a BRS report.***
2. Can I change my existing notification information using the standard BRS submittal? ***Yes, the standard BRS form is meant to be dual use. You must check the Subsequent Notification box in Section 1, Page 1 of the SI form if you wish NDEP to review your BRS submittal for updated site information, e.g. contact person, operator, generator status, etc.***
3. I notified as a CESQG but my actual generator status for 2009 is SQG (or LQG); which form do I fill out? ***You must file the standard BRS form, marking SQG (or LQG) for generator status. If you wish to change your generator status, check the Subsequent Notification box in Section 1, Page 1, of the site identification form.***
4. I notified as an SQG (or LQG) but my generator status for 2009 was CESQG. Which BRS form should I use? ***You must use the standard BRS form if your existing notification status is SQG or LQG. Also, if you wish to update notification information, you must check the Subsequent Notification box in Section 1, Page 1 of the SI form so that NDEP will review your BRS submittal for updated site information, e.g. contact person, operator, generator status, etc.***
5. I generated hazardous waste at the SQG (or LQG) level in calendar year 2009 but do not have an EPA ID number for my site. Can I obtain an EPA ID number and file my 2009 BRS report in a single submittal? ***Yes, the standard BRS form is meant to be dual use. You must check the Initial Notification and Hazardous Waste Report boxes in Section 1, Page 1, of the site identification form to submit both initial notification and your 2009 BRS report.***
6. Can I use the standard BRS form to deactivate my EPA ID number? ***Yes, you must check the Subsequent Notification box in Section 1, Page 1 of the SI form and note in Comments, Section 12, Page 3 of the SI form that you are requesting that the EPA ID number be deactivated.***
7. How many copies of my completed BRS form should I make? ***You should make at least one copy of your 2009 BRS Report to keep on site at your facility for three years as required by state regulations.***
8. Is there any penalty for not submitting the required 2009 BRS report? ***Yes, NAC 444.8706 provides for a maximum penalty of \$500 for failure to submit a properly completed biennial report.***

9. Has Nevada delegated the regulation requiring notification of Hazardous Secondary Material Activity? **No, Nevada has not delegated 40 CFR 260.42.**

10. I don't know my NAICS codes. Where can I find this information? **The US Census Bureau has a website lookup table to determine your NAICS code. Go to www.census.gov/cgi-bin/sssd/naics/naicsrch?chart=2007 for the 2007 NACICS .**

11. I don't know our EPA ID number. How do I get it? **If you are unsure what your EPA Identification Number is please check the mailing label of the envelope accompanying this letter, call the Nevada Small Business Development Center's Business Environmental Program at (800) 882-3233, in Las Vegas at (702) 866-5927, or look it up at www.epa.gov/enviro or www.epa.gov/echo/.**

12. Company XYZ handles my waste, are they responsible for submitting my report? **No, you are responsible for submitting the BRS for your facility.**

13. I'm new at this job, can I get an extension to submit? **No. there are no extensions. Please notify the State of Nevada Biennial Report Staff of your problems and complete the Biennial Report as soon as possible.**