



Florida Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Governor

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Secretary

Management of CESQG Waste at HHW Facilities

July 22, 2011

This fact sheet provides guidance for Florida's Household Hazardous Waste Collection Centers (HHW Centers) that wish to accept hazardous waste generated from Conditionally Exempt Small Quantity Generators (CESQGs).

County HHW programs were started with DEP grants that required CESQG waste collection at the HHW Centers for the first five years. The initial grant requirement provides CESQGs with affordable and convenient options for proper hazardous waste disposal. After the grant expires, the county may decide to continue to accept CESQG waste. The department encourages county HHW Centers to request authorization in order to accept CESQG waste.

This language is now in Chapter 62-730, FAC, effective as of January 29, 2006:

62-730.220 Applications for Permits and Other Authorizations.

(5) 40 CFR 261.5(f)(3)(iii) and 40 CFR 261.5(g)(3)(iii) [as adopted in subsection 62-730.030(1), F.A.C.] provide that waste generated by conditionally exempt small quantity generators ("CESQG waste") must be delivered to certain specified facilities, including a facility "authorized to manage hazardous waste by a State with a hazardous waste management program approved under Part 271 of this chapter." Florida is such a state. The Department's authorization to manage CESQG waste shall include facility-specific operating conditions, including location, generator responsibilities, amount and type of wastes, time limits, and recordkeeping, as appropriate to the request and generator status of the authorized person.

If a HHW program wishes to continue accepting CESQG waste, a request for authorization may be made by submitting a letter (see template below) to the department showing that they have met these three criteria.

- 1) **Has received or is receiving a DEP HHW grant**
- 2) **Has obtained an EPA Identification Number.**
 - a. If this number has not been obtained then submit form [8700-12FL](http://www.dep.state.fl.us/waste/quick_topics/forms/pages/62-730.htm), http://www.dep.state.fl.us/waste/quick_topics/forms/pages/62-730.htm, requesting an EPA Identification Number. Check box 9.A.(5) on the form 8700-12FL

indicating the facility is applying for an authorization to manage CESQG waste generated at other facilities. Identify the facility as a non-handler of hazardous waste.

- 3) **Has CESQG waste acceptance procedures.** Attach documentation providing information on facility-specific operating conditions, including a general description of how the hazardous materials are diverted and stored, how long they are stored, and how they are properly managed.

The new language does not apply to county HHW programs that allow CESQGs to bring waste when a hazardous waste management contractor is on-site because the waste is being delivered directly to a registered hazardous waste transporter.

Florida Department of Environmental Protection
Hazardous Waste Regulation Section, MS4560
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Phone: (850) 245-8707
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Suggested Format for HHW Program CESQG Letter:

< county letterhead >

< date >

Florida Department of Environmental Protection
Hazardous Waste Regulation Section, MS 4560
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

< county name > County operates a Household Hazardous Waste (HHW) Program that started in < year > with DEP grant < grant number > requiring Conditionally Exempt Small Quantity Generator (CESQG) waste collection for five years. The county has continued this service to assist small businesses in properly managing their hazardous waste, and we understand that DEP encourages this effort. The type, amount and origin of CESQG waste collected through our HHW facility cannot be predicted due to the nature of these very small businesses. But to ensure the HHW facility receives hazardous waste only from CESQGs, the county < insert all waste acceptance procedures used, see examples below >.

We request that your office authorize the following facility(ies) to accept CESQG waste per 62-730.030(1), F.A.C.

< insert county facility(ies) name, physical address AND EPA ID NUMBER >

Please contact me if further information is needed.

Sincerely,

< your name >

< title >

Waste acceptance procedures used by county HHW programs:

- Has a standard operating procedure for accepting business waste
- Conducts a verbal survey identifying the participant as a CESQG
- Conducts a written survey identifying the participant as a CESQG
- Requires a signed statement identifying the participant as a CESQG
- Requires an appointment for a CESQG waste drop-off
- Requires a visual inspection of the type and amount of waste by HAZWOPER trained technicians
- Schedules CESQG waste collections with the hazardous waste contractor on-site
- Charges fees and provides receipts to CESQGs
- Limits the amount of waste per customer
- Limits the amount of waste that can be accepted from a business each year

Be prepared to document and submit the procedures if asked.