

# Florida Department of Environmental Protection



## Hazardous Waste Section

# Hazardous Waste Standards For CESQG and SQG





# Generator Status

- **Conditionally Exempt SQG (CESQG)**
  - Generates  $< 100$  kg/mo ( $\sim 1/2$  drum),  $< 1$ kg P waste
  - may not accumulate more than 1,000 kg ( $\sim 5$  drums) at one time
- **Small Quantity Generator (SQG)**
  - Generates 100 kg/mo to 1000 kg/mo ( $\sim 1/2$  drum - 5 drums)
  - may not accumulate more than 6,000 kg ( $\sim 30$  drums)
- **Large Quantity Generator (LQG)**
  - Generates  $> 1000$  kg/mo ( $\sim 5$  drums),  $> 1$ kg P waste



# Generator Status - CESQG

- **Conditionally Exempt SQG**

- Generates < 100 kg/mo (~1/2 drum), < 1kg P waste
- Perform a hazardous waste determination pursuant to 40 CFR 262.11
- May not accumulate more than 1,000 kg (~5 drums) at one time
- Ensure delivery of hazardous waste to a proper facility pursuant to 40 CFR 261.5(g)(3)
- Keep records documenting proper disposal [62-730.030(3) and (4), FAC]



# CESQGs Next Door





# Solvent Parts Washer





# CESQG Failing to Ensure Proper Disposal of D001 Paint





# Generator Status - SQG

- **Small Quantity Generator**
  - Generates 100 kg/mo to 1000 kg/mo (~1/2 drum - 5 drums)
  - may not accumulate more than 6,000 kg (~30 drums)



# 40 CFR 262 Subpart A – General Standards

- Perform a hazardous waste determination pursuant to 40 CFR 262.11
- Notify the DEP and obtain an EPA/DEP identification number pursuant to 40 CFR 262.12. Notification forms are available on DEP's website:

[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)





# 40 CFR 262 Subpart B – The Manifest

- Use a Uniform Hazardous Waste Manifest
- May use tolling agreement instead of manifest

# SQG Improperly Managing Waste





# SQG Improperly Managing Waste







# Haz Waste in the Trash







# Haz Waste in the Trash



# Haz Waste in the Trash







# Haz Waste in the Trash





# 40 CFR 262 Subpart C – Accumulation Requirements

- Hazardous waste should be accumulated in containers
- Hazardous waste may be accumulated in tanks if the requirements of 40 CFR 265.201 are met





# SQG - Accumulation Limits

- SQGs may accumulate waste for 180 days
- A one time 30-day extension may be granted by the DEP under unusual circumstances
- A SQG may accumulate up to 6000 kgs of hazardous waste at one time

# SQG Container



# SQG Containers - Dates

- Marked with date of accumulation





# Containers - Labels

- Labeled “Hazardous Waste”

A yellow hazardous waste label with a red and black diagonal striped border. The text on the label is as follows:

**HAZARDOUS WASTE**  
FEDERAL AND/OR STATE LAWS PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

GENERATOR INFORMATION:

NAME \_\_\_\_\_  
ADDRESS \_\_\_\_\_ PHONE \_\_\_\_\_  
CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_  
EPA ID NO. \_\_\_\_\_ STATE MANIFEST DOCUMENT NO. \_\_\_\_\_  
ACCUMULATION START DATE \_\_\_\_\_ EPA WASTE NO. \_\_\_\_\_

[ \_\_\_\_\_ ]

D.O. PROPER SHIPPING NAME AND QUANTITY WITH MSDS

**HANDLE WITH CARE!**





# SQG - Satellite Container





# SQG - Satellite Container ?





# SQG - Satellite Container ?







# SQG - Container Condition





# SQG - Container Compatibility





# SQG - Tanks

- Label “Hazardous Waste”
- Document 180 day storage limit compliance
- Comply with 40 CFR 265.201 (SQG)



# SQG - Closed Container







# SQG – Closed Container







# SQG – Container Management





# SQG – Container Management







# SQG - Containers - Aisle Space







# SQG - Containers - Aisle Space





# 40 CFR 262 Subpart C – Emergency Coordinator

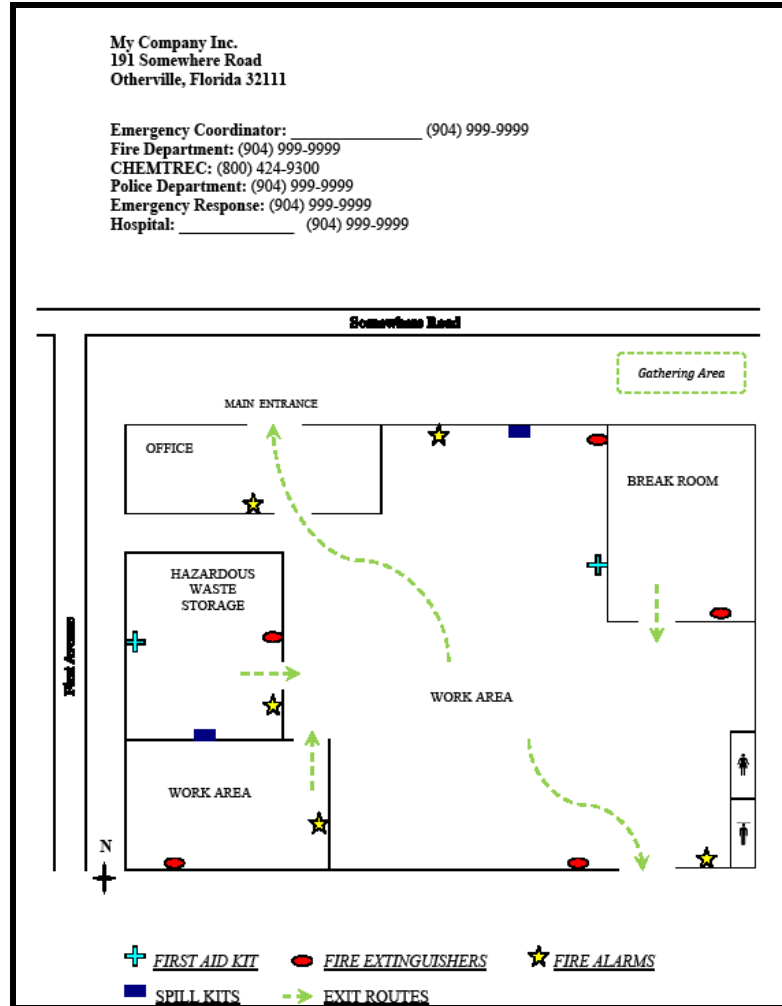
- 40 CFR 262.34(d)(5)(i)
  - Have at least one designated coordinator
  - Coordinates all emergency response measures
  - Either on premise or short distance away



# 40 CFR 262 Subpart C – Modified Contingency Plan

My Company Inc.  
191 Somewhere Road  
Otherville, Florida 32111

Emergency Coordinator: \_\_\_\_\_ (904) 999-9999  
Fire Department: (904) 999-9999  
CHEMTREC: (800) 424-9300  
Police Department: (904) 999-9999  
Emergency Response: (904) 999-9999  
Hospital: \_\_\_\_\_ (904) 999-9999







# 40 CFR 262 Subpart C – Personnel Training





# SQG - Personnel Training





# 40 CFR 265 Subpart C – Preparedness and Prevention

- Maintenance and Operation – 40 CFR 265.31
- Minimize the possibility of fire, explosion, or release of hazardous waste or hazardous waste constituents to the air, soil, surface, or groundwater





# SQG - Maintenance and Operation

- Facility must be properly maintained and operated



# SQG - Maintenance and Operation





# SQG - Maintenance and Operation







# SQG - Maintenance and Operation





# SQG - Maintenance and Operation





# 40 CFR 265 Subpart C – Required Equipment

- Internal communications or alarm equipment [40 CFR 265.32(a)]
- Telephone or two-way radio [40 CFR 265.32(b)]
- Fire Equipment [40 CFR 265.32(c)]





# 40 CFR 265 Subpart C – Required Equipment

- Spill control/decon equipment [40 CFR 265.32(c)]
- Water or foam available at adequate volume or pressure [40 CFR 265.32(d)]



# 40 CFR 265 Subpart C – Required Equipment (cont.)





# 40 CFR 265 Subpart C – Emergency Arrangements

- Make Arrangements with the local Authorities  
[40 CFR 265.37]
- Please document and keep copies





# 40 CFR 262 Subpart D – Recordkeeping and Reporting

- Exception reports required pursuant to 40 CFR 262.42(b) if a copy of the manifest is not received within 60 days
- Test results – for example - 40 CFR 262.11 determinations
- Other records, like modified contingency plan implementation [40 CFR 262.43]



# 40 CFR 262 Subpart D – Recordkeeping and Reporting

- Weekly Container inspections [40 CFR 265.174]
- Container Inspection Records [62-730.160(6), FAC]
  - Date
  - Time
  - Legibly written name of the inspector
  - Number of containers
  - Condition of containers
  - Notes of observations made, date and nature of repairs or corrective actions



# Land Disposal Restrictions (LDR) – 40 CFR 268

- LDR waste analysis
- LDR notification
- LDR certification
- LDR waste analysis plan
- Retain Documentation for 3 years





# LDR Notice Contents

- All Applicable Waste Codes
- Treatability Group
- Constituents subject to regulation, if not all regulated constituents
- Manifest Document Number of Shipment
- Waste analysis data where available
- One time notice pursuant to Phase IV LDR dated 5/12/97 (62 FR 25998-26040)



# Questions?

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