



Small Business Hazardous Waste Management

As a business owner/operator, it is your responsibility to ensure that all wastes generated by your business are disposed of in a way that does not harm public health and the environment.

What are the benefits of proper management of hazardous waste?

Hazardous waste regulations were established to minimize human and environmental exposure to hazardous chemicals. The Environmental Protection Agency (EPA) has written a comprehensive set of regulations that govern the management of hazardous waste from the point of generation to disposal. They also incorporate a record keeping/reporting/tracking system to verify and document that the waste is, in fact, managed appropriately. Finally, compliance with hazardous waste regulations is an **enforceable** law. Non-compliance can result in fines of up to \$27,500 per day per violation.

HAZARDOUS WASTE

Hazardous Waste is considered any waste material that is listed in 40 CFR, part 261, or is so flammable, corrosive, or toxic that it creates a possible threat to human health or the environment. The following are examples of regulated hazardous waste generated by businesses:

- ◆ **FLAMMABLES**
 - oil-based paints
 - mineral spirits
 - solvents
 - fuels
 - aerosols
- ◆ **CORROSIVES**
 - caustics (paint stripper, drain opener)
 - acids (battery acid, muriatic acid, rust remover)
- ◆ **TOXICS**
 - pesticides
 - wood preservatives
 - fungicides
 - herbicides
- ◆ **AUTOMOTIVE WASTES**
 - used oil
 - antifreeze
 - brake fluid
 - transmission fluid
 - used oil filters
- ◆ **UNIVERSAL WASTES**
 - fluorescent bulbs
 - PCB containing ballasts
 - mercury containing devices
(thermostats, thermometers, float switches, rechargeable batteries)



Hazardous Waste regulations can be found in the Code of Federal Regulations, Title 40, parts 260-271.

The Resource Conservation and Recovery Act (1976) is the law!

All generators of waste materials are required by law to identify and evaluate their waste!

Florida Administrative Code (FAC) 62-730 references the federal regulations.

How Do I Determine Generator Status?

To determine your correct generator status, you are required to count any hazardous waste:

1. Accumulated prior to recycling, transporting, long-term storage, treatment or disposal.
2. Transported off site for treatment, storage or disposal.
3. Treated or disposed of on site (unless exempt).

Hazardous Waste Generator Categories

CESQG-Conditionally Exempt Small Quantity Generator

Generates no more than 220 pounds (100 kg) of Hazardous Waste **per month**. Never accumulates more than 2,200 pounds (1,000 kg) at any time. If accumulation exceeds 2,200 lbs then the generator becomes subject to the requirements of an SQG.

SQG-Small Quantity Generator

Generates more than 220 pounds (100 kg) but less than 2,200 pounds (1,000 kg) **per month**. Can not store more than 13,200 pounds on site for more than 180 days.

1. Must obtain an EPA ID number; obtain EPA form 8700-12, Notification of Regulated Waste Activity, and follow instructions. You can obtain forms and instructions by writing to:

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

These forms are also available at DEP's web site at www.dep.state.fl.us/dwm/programs/hazardous

LQG-Large Quantity Generator

Most businesses in Charlotte County that generate a hazardous waste fall into the *CESQG* category. Examples of businesses that may be a *CESQGS* or *SQG* include:

- ◆ Auto Repair/Body Shops
- ◆ Dental/Medical Offices
- ◆ Furniture manufacturing/refinishing
- ◆ Painting contractors
- ◆ Printers
- ◆ Construction
- ◆ Transportation
- ◆ Dry Cleaners
- ◆ Marinas/Boat repair



Improper storage and disposal of waste can result in huge fines to your business.

CESQG Regulatory Requirements

CESQG regulations are relatively lenient compared to the other sets of hazardous waste regulations and only stipulate the following requirements:

- Waste must be appropriately categorized as hazardous or non-hazardous following EPA protocol contained in 40 CFR 262.11.
- CESQGs may not generate more than 220 pounds of hazardous waste per month.
- CESQG hazardous waste must be treated or disposed of (as discussed below) before the on-site storage amount reaches 2,200 pounds.
- If the facility's hazardous waste generation rate exceeds 220 pounds per month or more than 2,200 pounds of hazardous waste is allowed to accumulate on site, then the facility is no longer a CESQG and must comply with the more stringent set of regulations established for Small Quantity Generators (SQGs) or Large Quantity Generators (LQGs).
 - CESQG hazardous waste must be treated or disposed of:
 - By an EPA-permitted hazardous waste management company,
 - At a State of Florida DEP-permitted regional collection center, or
 - At a facility which beneficially uses or legitimately recycles hazardous waste.

CESQGs are not required to obtain an EPA Hazardous Waste Generator Identification Number according to federal law, but may be asked to have an ID number as a matter of policy imposed by the hazardous waste transportation/disposal company providing service. Application for an ID number is accomplished by completing the form enclosed in EPA's "Notification of Regulated Waste Activity" booklet (EPA Form 8700-12).

Did You Know...that rags or disposable towels that are used to clean or wipe hazardous solvents or adhesives are considered a hazardous waste and cannot be placed in the regular trash? A commercial laundry can be used for the rags, otherwise you must have them disposed of by a registered hazardous waste transporter.

CESQG Hazardous Waste Management Recommendations

While not required by law, the following hazardous waste management recommendations should be considered for implementation to reduce the likelihood of spills, mismanagement, adverse human and environmental effects and resulting liabilities.

- Hazardous waste should be stored in sealed containers that are clearly labeled "Hazardous Waste".
- Hazardous waste storage containers should be packaged, labeled and marked according to the Department of Transportation's (DOT) hazardous materials transport regulations.
- All shipments of hazardous waste should be accompanied by a Uniform Hazardous Waste Manifest and a Treatment Standard Notification (TSN) form (if applicable).
- Hazardous waste storage areas should be maintained and operated to minimize the possibility of fire, explosion or release of hazardous waste.
- Personnel handling hazardous waste should receive adequate training to assure they are competent to perform this activity and should have immediate access to a telephone to summon help in the event of a spill. Emergency response telephone numbers should be posted.

Copies of laboratory data documenting the hazardous/non-hazardous status of waste, hazardous waste generation rate/storage inventories, manifests/TSN forms, proof of employee training, MSDS'S, etc., should be maintained on file to document compliance.

For more information on rules & regulations regarding hazardous waste disposal, storage, or treatment please call our office or visit the following links to the Florida Department of Environmental Protection:

Hazardous Waste: <http://www.dep.state.fl.us/waste/categories/hazardous/pages/facility.htm>

Used Oil & Oil Filter Management: http://www.dep.state.fl.us/waste/categories/used_oil/default.htm

