



# AAG ENVIRONMENTAL

Post Office Box 959 Newberry, FL 32669-0959  
800-472-9251 352-472-7295 Fax 352-472-6097

*We'll Take It From Here...*

January 22, 2015

Jabe Breland III  
Florida Department of Environmental Protection  
8800 Baymeadows Way, Suite 100  
Jacksonville, FL 32256-7526

re: CESGQG Consolidation Facility

Dear Mr. Breland,

AAG Environmental, Inc. (AAG) is an emergency response contractor conducting activities throughout Florida, especially responding to discharges resulting from traffic accidents and from distressed cargo issues. AAG also responds to clean up illegal methamphetamine laboratories after law enforcement officers have completed their investigation. While it is almost always law enforcement that removes all of the hazardous waste and arranges for the waste disposal through a federal program handled by the US DEA, the possibility still remains that AAG might be called on to provide this service. AAG also provides cleanup of the actual illegal laboratory site once all of the waste is removed though little if any of this waste would likely be classified as a hazardous waste. In addition, AAG has recently been asked to collect damaged freight from various trucking terminals. If the trucking terminal is a Conditionally Exempt Small Quantity Generator (CESQG) then AAG would bring the waste to the AAG facility located at 25370 NW 8 Lane, Newberry, Alachua County, Florida and consolidate it for subsequent disposal at a permitted hazardous waste treatment, storage, or disposal facility (TSDF) as CESQG waste. If the generator is a Small Quantity or Large Quantity Generator, an EPA ID number must be obtained if the facility does not already have an EPA Facility ID number, and the waste must be delivered to a TSDF within 24 hours plus transit time. If this waste stays at AAG's site for longer than 24 hours, then AAG would become a Hazardous Waste Transfer Facility and 62-730.171, FAC regulations would apply.

In meeting the CESQG regulatory requirements, AAG understands that the following will be part of the normal protocol:

At generator facility and arrival at AAG's site:

- ▶ comply with all USDOT shipping requirements when preparing waste for shipment off-site
- ▶ ensure the generator is a CESQG and have the facility certify that they are operating as a CESQG; keep these certifications on-site at AAG for three years
- ▶ load drums such that incompatible chemicals are separated
- ▶ upon arrival at AAG, drums will be brought into the AAG facility within one business day
- ▶ consolidation will start within two business days upon being brought into facility

After consolidation:

- ▶ will maintain adequate aisle space in accordance with 40 CFR 264.35
- ▶ drums will be inspected weekly in compliance with 62-730.160(5), FAC
- ▶ unless actively being consolidated, all hazardous waste containers will be kept closed
- ▶ All hazardous waste containers will be labeled with the words "hazardous waste" and, once consolidated, will be dated with the accumulation start date
- ▶ fire and spill equipment should be readily available and in working condition
- ▶ ensure all containers are kept in good condition in accordance with 40 CFR 265.171
- ▶ all employees handling hazardous waste will receive training in hazardous waste procedures
- ▶ hazardous waste transporter authorization is to be kept current; this registration should be kept in all vehicles transporting hazardous waste.
- ▶ no drum will be kept at AAG more than 180 days past the accumulation start date
- ▶ CESQG party will be provided a record of disposal
- ▶ the AAG facility will not accumulate more than ten 55-gallon drums on-site at any one time
- ▶ Keep an inventory/log of what hazardous waste is stored on-site; this log will include:
  1. Manifest number for each shipment that enters and leaves the facility or, for a shipment from a CESQG without a manifest, an identifying number from the shipping document
  2. The date when all hazardous waste enters and leaves the facility
  3. Name, address, and EPA ID number (if applicable) of the generator
  4. The amount of hazardous waste and hazardous waste codes associated with each shipment into and out of the facility

If you have any questions or need any additional information or if you have any recommendations on the procedures used by AAG, please contact us.

Sincerely,



Alan B. Chandler  
President