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Subject: Management of CESQG Waste
Date: Monday, May 16, 2016 7:23:00 AM

Mr. Ahmadi,

During the inspection on May 10, 2016, it was determined Photographic Waste Control is storing CESQG waste for periods greater than 10 days allowed for hazardous waste transfer facilities. In order to continue this activity, Photographic Waste Control must request, and receive, authorization from the Department. Below is the information that is required.

TRANSPORT OF CESQG WASTE TO A CENTRAL LOCATION FOR STORAGE/DISPOSAL

Rule 62-730.220(5), F.A.C. reads “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.

Prior to Photographic Waste Control storing any further CESQG waste for greater than 10 days, Photographic Waste Control must provide the Department with a Waste Management Plan that includes, at least, the following information:

- A description of efforts that will be undertaken to prove that individual generating locations have been surveyed, prior to accepting waste from each location, to ensure they are in fact a Conditionally Exempt Small Quantity Generator. This survey would include all areas of the facility that are expected to generate wastes.
- The position description of the staff person who will transport the CESQG waste.
- Creation of a log documenting the type of hazardous waste picked up from each location and the date.
- The location where the waste will be stored.
- Waste received from CESQG sites will not be stored longer than 180-days.

Prior to accepting any CESQG waste from off-site locations for storage on-site greater than 10 days, Photographic Waste Control will request the following information from the individual generators:

- A list of the specific types and amounts of wastes and/or off-specification chemicals to be managed. Photographic Waste Control must ensure waste is not received from any individual generating location that generates volumes of

acutely toxic (P-listed) chemicals, identified in 40 CFR 261.33, in quantities that exceed 1 kilogram in any given calendar month.

Photographic Waste Control will maintain a file containing the following information for a period of 3 years from the date the waste was received:

- Records relating to each waste transfer request including:
 - A copy of the list of specific types and volumes of waste to be transferred.
 - Each site survey documenting the original generating site is a CESQG.
 - Manifests document off-site shipment for final disposal of the waste.

If you have any questions please let me know.

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