



# THE ENVIRONMENTAL QUALITY COMPANY

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JAN 14 2010

BY: BSHW

January 11, 2010

Mr. Anthony Tripp, Ph.D., P.E.  
Professional Engineer III  
Florida Department of Environmental Protection  
Division of Waste Management  
Bureau of Solid and Hazardous Waste  
2600 Blair Stone Road MS 4560  
Tallahassee, FL 32399-2400

Re: Consolidation of Material

Dear Mr. Tripp:

I am asking for guidance concerning the process of consolidating like material into a larger container at a permitted 10-day hazardous waste transfer facility. The consolidation process would involve pumping, pouring, re-containerizing, transferring, or decanting material from a small container into a larger container.

Examples may include:

1. Consolidating (pouring up) ten 5-gallon pails into one 55-gallon drum; or
2. Consolidating (pumping) ten 250-gallon totes into a 5,000 gallon tanker.

It appears that according to 40 CFR 263.10(c)(2), this practice is permissible as long as the requirements of 40 CFR part 262 are complied with. If I am misinterpreting this regulation please let me know.

If you have questions or comments concerning this matter, please call me at 813-319-3423.

Sincerely,

Stuart Stapleton  
EHS Manager

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