



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

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Governor

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Secretary

## Management of CESQG Waste Generated from Methamphetamine Clandestine Drug Labs at Florida's Household Hazardous Waste Collection Centers

July 18, 2011

This fact sheet provides guidance for Florida's Household Hazardous Waste Collection Centers (HHW Centers) that wish to accept hazardous waste generated from illegal methamphetamine clandestine drug labs.

Hazardous waste generated from illegal methamphetamine clandestine drug labs in Florida is not exempted household hazardous waste in 40 CFR 261.4(b)(1). A hazardous waste determination must be made for all solid waste generated from a clandestine drug lab. One management option for clandestine drug labs identified as a Conditionally Exempt Small Quantity Generator (CESQG) is to send the hazardous waste to a HHW Center that is authorized to manage CESQG waste.

HHW Centers may be authorized to receive and manage CESQG waste pursuant to Rule 62-730.220(5), Florida Administrative Code, without being considered a hazardous waste generator. Since HHW facilities are allowed to commingle HHW and CESQG waste, they may commingle HHW and CESQG waste and still retain their non-handler status.

To facilitate the process for HHW Centers that are interested in receiving a CESQG management authorization, the following procedures are recommended.

The Household Hazardous Waste Collection Program should:

- 1) Submit a letter to the Hazardous Waste Regulation Section, MS 4560, Bob Martinez Center, 2600 Blair Stone Rd., Tallahassee, Florida 32399 showing the HHW Center has received or is receiving a DEP HHW grant.
- 2) Have an EPA Identification Number.
  - a. If this number has not been obtained then submit form [8700-12FL](#), [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), requesting an EPA Identification Number. Check box 9.A.(5) on the form 8700-12FL indicating the facility is applying for an authorization to manage CESQG waste generated at other facilities. Identify the facility as a non-handler of hazardous waste.

- 3) Attach documentation providing information on facility-specific operating conditions, including a general description of how the hazardous materials are diverted and stored, how long they are stored, and how they are properly managed.

For a generic letter that addresses 1, 2 and 3 above and can be modified for your program, refer to the attached sample letter. You may also download the generic letter at DEP's website at:

<http://www.dep.state.fl.us/waste/categories/hazardous/pages/publications.htm>, select "Management of CESQGs Waste at Household Hazardous Waste Facilities."

Upon receipt of information identified above, and assuming the facility is in compliance with the provisions of Rule 62-730.220(5), F.A.C., the Department will issue an authorization to the HHW Center for management of the CESQG waste, and will classify the facility as a non-handler of hazardous waste. The Hazardous Waste Regulation Section will provide a copy of the authorization to the DEP District Waste Program Administrator.

Please note that while most illegal methamphetamine clandestine drug labs are CESQGs, make sure that you do not accept quantities of hazardous waste from clandestine labs that exceed the CESQG amount of less than 100 kg/month or 1 kg/month of an acute hazardous waste.

Florida Department of Environmental Protection  
Hazardous Waste Regulation Section, MS4560  
Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Phone: (850) 245-8707  
[www.dep.state.fl.us](http://www.dep.state.fl.us)

Suggested Format for HHW Program CESQG Authorization Letter:

< county letterhead >

< date >

Glen Perrigan  
Florida Department of Environmental Protection  
Hazardous Waste Regulation Section, MS 4560  
Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Perrigan:

< county name > County operates a Household Hazardous Waste (HHW) Program that started in < year > with DEP grant < grant number > requiring Conditionally Exempt Small Quantity Generator (CESQG) waste collection for five years. The county has continued this service to assist small businesses in properly managing their hazardous waste. We understand that DEP encourages this effort.

The type, amount and origin of CESQG waste collected through our HHW facility cannot be predicted due to the nature of these very small businesses. But to ensure the HHW facility receives hazardous waste only from CESQGs, the county < insert all waste acceptance procedures used, see examples below >.

We request that your office authorize the following facility (ies) to accept CESQG waste per 62-730.030(1), F.A.C.

< insert county facility(ies) name, physical address AND EPA ID NUMBER >

Please contact me if further information is needed.

Sincerely,

< your name >

< title >

Waste acceptance procedures used by county HHW programs:

- Has a standard operating procedure for accepting business waste
- Conducts a verbal survey identifying the participant as a CESQG
- Conducts a written survey identifying the participant as a CESQG
- Requires a signed statement identifying the participant as a CESQG
- Requires an appointment for a CESQG waste drop-off
- Requires a visual inspection of the type and amount of waste by HAZWOPER trained technicians
- Schedules CESQG waste collections with the hazardous waste contractor on-site
- Charges fees and provides receipts to CESQGs
- Limits the amount of waste per customer
- Limits the amount of waste that can be accepted from a business each year

Be prepared to document and submit the procedures if asked