

## Disposal Guidelines for School Facilities

The purpose of this guidance document is to outline disposal options for hazardous waste generated by educational facilities. Hazardous wastes (HW) are wastes *listed* in 40 Code of Federal Regulations (CFR) 261 Subpart D, or they are wastes *characterized* in 40 CFR 261 Subpart C as hazardous by exhibiting one of four characteristics:

- *ignitability* (i.e., an oxidizer or flash point < 140°)
- *corrosivity* (i.e., pH < 2 or >12.5)
- *reactivity*, or
- *toxicity*.

A hazardous waste determination must be made of any waste material generated. (See 40 CFR 262.11). Measure all quantities of listed and characteristic hazardous wastes that are:

- Accumulated on the property for any period of time before disposal or recycling.
- Packaged and transported away from your facility
- Placed directly in a regulated treatment or disposal unit at your facility.
- Generated as still bottoms or sludges.

When a hazardous waste determination has been conducted, the amount of waste generated monthly or stored on site will establish generator status.

It is most likely that a school facility will be a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. If your facility status is a LQG (large quantity generator), or a SQG (Small Quantity Generator), contact DEP for further assistance. CESQGs generate 220 pounds (100 kilograms) or less per month of hazardous waste, or 2.2 pounds (1 kilogram) or less per month of acutely hazardous waste. Requirements for CESQGs include (see 40 CFR 261.5):

- CESQGs must identify all the hazardous waste generated.
- CESQGs may not accumulate more than 2,200 pounds (1,000 kilograms) of hazardous waste at any time.
- CESQGs must ensure that hazardous waste is delivered to a person or facility that is authorized to manage it. Written documentation must be kept for three years.

Hazardous wastes have the potential to harm human health and the environment. These wastes can't be put in the garbage or down the drain. They cannot be disposed on or in the ground, or in local landfills, septic tanks, or injection wells, and may not be disposed of by open burning. You may recycle or reclaim these wastes or dispose of them through licensed hazardous waste management firms. **Not complying with hazardous waste regulations can lead to significant fines and penalties.**

Regardless of quantity, the generator of HW is ultimately responsible for the waste from "cradle to grave", and can be held liable for improper management of HW even though it may have been sent to a "proper" HW management facility using a licensed transporter.

When disposing of hazardous waste follow these guidelines;

- a) Comply with Department of Transportation regulations (CFR 49) when transporting wastes.
- b) **DO NOT** dispose of waste chemicals down the drain unless they have been properly treated in accordance with local, state and federal guidelines.
- c) Do not use fume hoods to evaporate volatile chemicals.
- d) Dispose of wastes by recycling, reclamation or chemical deactivation whenever possible. Use a hazardous waste transporter if this is not possible.
- e) Avoid stocking over 2.2 pounds (1.0 kilogram) of "P-listed" chemical products. This could help you stay below large quantity hazardous waste generator status. This link will help you identify listed wastes.  
<http://www.epa.gov/epaoswer/osw/hazwaste.htm>.

As of May 8, 1990, most hazardous wastes must be treated to meet Land Disposal Restrictions (LDR) prior to disposal in permitted hazardous waste landfills or surface impoundments. **The LDR rule prohibits the dilution of restricted wastes as a substitute for effective adequate treatment.**

Treating or neutralizing hazardous waste can be dangerous and should only be done by personnel with proper training. Before you attempt to neutralize hazardous wastes for sewer or solid waste disposal, call your county or municipal landfill or water treatment facility to see if your treatment process is acceptable. Written documentation of chemical treatment activities may be required. Certain wastes, such as heavy metals or pure chemical product, must **NEVER** be discharged to the sanitary sewer in **ANY** concentration. These wastes must be collected and managed as hazardous waste. Contact your local POTW (Publicly Operated Treatment Works) for specific information. Since most concentrations in a lab are a 0.1 Molar solution, keep in mind that 0.1 Molar CuSO<sub>4</sub> is equal to 6355 mg/L of copper.

You may dispose of hazardous waste as outlined below. It is the responsibility of the facility to ensure hazardous waste does not end up in ground water, soil or the atmosphere through improper disposal.

1) **Sanitary Sewer** - Some chemicals (acids or bases) may be neutralized and disposed to the sanitary sewer. This disposal option must be approved by the local waste water treatment authority prior to disposal. This may not be an option for some small communities that do not have sufficient treatment capacity at the waste water treatment plant for these types of wastes. Hazardous waste may **NOT** be disposed of in this manner. This includes heavy metals.

2) **Household Hazardous Waste Facility** - Waste chemicals may be disposed through a county household hazardous waste facility (HHW) or through a county contracted household hazardous waste disposal company. **Not all counties have a program to accept waste from schools.** Verify with your county HHW facility that they can handle your waste prior to making arrangements. For a list of county HHW facility coordinators visit:

[www.dep.state.fl.us/waste/categories/hazardous/pages/household.htm](http://www.dep.state.fl.us/waste/categories/hazardous/pages/household.htm).

3) **Disposal Through a Contractor** - A contractor may be used for the disposal of the waste chemicals. A list of contractors and disposal companies can be found at:

[http://www.dep.state.fl.us/waste/quick\\_topics/database\\_reports/default.htm](http://www.dep.state.fl.us/waste/quick_topics/database_reports/default.htm).

Remember that you must keep documentation of your hazardous waste disposal for at least three years. This information must include a waste manifest, reclamation agreement or any written record which describes the waste and how much was disposed, where it was disposed and when it was disposed. Waste analysis records must also be kept when making a determination is necessary.

**Any unknown chemicals should be considered hazardous!**

Call the Bureau of Solid & Hazardous Waste at 850.245.8707, or visit our website for additional information:

<http://www.dep.state.fl.us/waste/categories/shw/default.htm>.