



Florida Department of Environmental Protection

Guidelines to Conduct the Small Quantity Generator Assessment, Notification and Verification Program

September 2009

This manual provides guidelines for conducting the Small Quantity Generator Assessment, Notification and Verification Program to help ensure compliance with the program requirements established in Sections 403.7225, 403.7226, 403.7234, 403.7236, Florida Statutes (F.S.) Copies of these statutes can be found in the Appendix.

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1.0 Introduction

Sections 403.7225 and 403.7234, Florida Statutes (F.S.) establish a Small Quantity Generator Assessment, Notification and Verification (SQG ANV Program). A small quantity generator is defined in 40 Code of Federal Regulations (CFR) 260.10 as a generator that produces less than 1,000 kilograms (or approximately 2,200 pounds or about 275 gallons) of hazardous waste in any calendar month. The Department of Environmental Protection (FDEP) has adopted federal regulations as state regulations in Chapter 62-730, Florida Administrative Code (F.A.C.)

Part VI of the Water Quality Assurance Act of 1983 directed all counties in the State to complete a local hazardous waste management assessment and establish an Assessment Roll which contains all known and potential SQGs in the county. Each year this list is updated to include any newly identified or potential SQGs. The Assessment Roll and annual data updates are due on July 1 for all counties. Section 403.7225, F.S., requires that the SQG ANV Program be repeated every five years.

If a county declines to perform the local hazardous waste management assessment, the county shall make arrangements with its regional planning council (RPC) to perform the assessment.

Under Sections 403.7234 and 403.7225 (16), F.S., each county is required to initially notify all potential and known SQGs on the assessment roll, and to annually verify the waste management practices of at least 20% of the SQGs notified. SQGs verified in previous years would be excluded. Notifications are provided to all potential generators either by U.S. mail, by e-mail, at business license renewals, or during the on-site verification process. Verifications are made through on-site inspections of the facility.

According to State hazardous waste regulations, all small quantity generators of hazardous waste are to manage their wastes in one or more of the following ways:

- Render the waste non-hazardous on-site.
- Recycle or reuse the waste on-site or off-site.
- Store the waste according to State regulations.
- Ship the waste to a permitted hazardous waste management facility; or to a facility permitted, licensed, or registered by the State to manage industrial or municipal solid waste. Facilities (e.g. landfills) that are permitted to manage municipal solid waste are prohibited from accepting hazardous unless approved by the State.

Once the verification has been completed, the appropriate information is entered into FDEP's data management system called Small Quantity Generator Data Management System (SQGDMS). Additionally a cover letter summarizing the notification and

verification program efforts is to be sent to FDEP's Hazardous Waste Regulation Section (HWRS) by July 1 of each year. The cover letter shall include a summary of the information gathered to update county assessment data, newly identified SQGs, and the number of on-site verifications conducted. This process is repeated each year so that every known and potential SQG is inspected every five years.

Under Section 403.7225 (17) F.S., each county that implements the SQG ANV Program has the option to impose a surcharge of up to \$50 on the business or occupational license or renewal of any firm that is identified as a small quantity generator of hazardous waste. A county may contract with or otherwise enter into an agreement with the county tax collector to collect the annual surcharge.

The SQG Assessment, Notification and Verification Program will result in:

1. Up-to-date identification of SQGs statewide.
2. Local hazardous waste management programs that complement state and federal efforts, through compliance and education efforts.
3. A statewide database on SQGs classified by the North American Industry Classification System (NAICS).
4. Improved management of hazardous waste, the protection of public health and the county drinking water sources.
5. A better informed business and government community which can properly manage their hazardous waste. This will reduce their potential for civil and even criminal liability for hazardous waste violations
6. Dissemination of waste reduction technologies and information to help SQGs further reduce their generation of hazardous waste. Knowledge of hazardous materials and wastes stored at a business location, which can be useful for county departments responsible for comprehensive planning, emergency management, fire and police protection, health care, local hazardous waste collection programs, and water quality management.

2.0 Guidelines to Conduct the SQG Assessment, Notification and Verification Program

2.1 Summary

The SQG ANV Program consists of three parts, which are to be repeated every five years:

1. **Identify** all known and potential Small Quantity Generators of Hazardous Waste (less than 1,000 kilograms per month) in your county and compile this information into a list called SQG Assessment Roll.
2. **Notify** all SQGs on your Assessment Roll and inform them of their legal responsibilities regarding proper waste management practices including pollution prevention (P2) options and opportunities.
3. **Verify** the waste management practices for each SQG identified on your assessment roll by conducting on-site inspections of 20% of the SQGs each year.

2.2 Identify All Known and Potential Generators in Your County

Section 403.7225, F.S., directs all counties in the state to complete hazardous waste management assessments. The SQG ANV Program works on a five year cycle. At the beginning of each five year cycle an Assessment Roll containing all known and potential SQGs is established. Each year the Assessment Roll is updated to include any newly identified or potential SQGs. The Assessment Roll must be completed no later than on July 1. Updates are made yearly no later than July 1. A county must either perform the assessment itself or make arrangements with its regional planning council (RPC) to perform the assessment.

FDEP will provide technical assistance to county governments and RPCs to ensure consistency in implementing the local hazardous waste management assessments. Each county or RPC shall contact FDEP during the preparation of the local assessment to receive technical assistance. Each county or RPC shall follow these Guidelines in order to properly implement these assessments.

The first step is to identify all known and potential small quantity generators of hazardous waste in the county. Potential generators include both private and public sectors.

Step1: Develop a list of potential generators (Assessment Roll)

For the purposes of the SQG ANV Program, businesses and government facilities are classified by appropriate North American Industry Classification System (NAICS)

The NAICS code system provides a five and six-digit number for each industrial classification. A short list of NAICS code types most likely to generate hazardous waste can be found in the Appendix.

Several sources may be used to identify potential generators of hazardous waste. Examples include:

1. The FDEP "RCRA Handler" list is a good source of businesses in your county that have received an EPA Identification Number. This list is available from FDEP in a spreadsheet format. This should be the first list you work from since businesses on the list have identified themselves as generators of hazardous waste.
2. City and County Occupational licenses are sometimes very helpful and sometimes not, depending on how the businesses are categorized. Some cities and/or counties do not issue occupational licenses.
3. Electronic business listings can be a useful tool because most are grouped by NAICS, state, and county. Most allow you to export to a spreadsheet.
4. The Yellow Pages are the obvious place to look because they categorize businesses but may not include addresses. There may also be alternative lists of businesses that cover your county.
5. Department of Agriculture and Consumer Services Motor Vehicle Repair Registration Program list. All motor vehicle repair facilities in Florida must register with the Department of Agriculture and Consumer Services biennially.
6. Department of Health list of licensed x-ray facilities. Virtually every dentist, chiropractor and veterinarian has x-ray, as well as imaging centers, hospitals, etc.
7. Local Chambers of Commerce directories may be helpful, especially larger facilities, and their address information is usually up to date. Additionally, you may find information from trade associations.
8. Local Solid Waste departments that issue dumpster permits are a possibility, although many on their list may not be hazardous waste generators.

All the known and potential generators may be entered into SQGDMS to manage the Assessment Roll or a spreadsheet/database may be used. (Use of spreadsheet/database applies only to the Assessment Roll. All verification information must eventually be added to the SQGDMS.) Each SQG should be identified by the facility name, physical location address with zip code, phone number with area code, and the NAICS code. Be sure to include government facilities and public institutions as well as businesses on the Assessment Roll.

Result: List of business and government facilities has been assembled

Step 2: Eliminate Duplicates and Remove Inappropriate Entities

Eliminate duplicates from your list. A county or RPC may find some inappropriate names on the list. These can be deleted with discretion; keeping in mind that some operations within an NAICS industry group may generate hazardous waste while others may not. Some facilities not currently generating hazardous waste have the potential of being hazardous waste generators. These facilities should not be deleted from the list. Also, do not delete businesses or government operations that use up their hazardous wastes, have their hazardous wastes recycled or have them reclaimed. These entities generate hazardous waste and should be verified. Making prescreening phone calls or interviews will help a county determine which facilities should be added to the Assessment Roll.

Result: Your list will be as accurate as possible and not contain duplicates

Step 3: Maintaining the Assessment Roll

The Assessment Roll is not static. This can present a problem when it comes time to verify 20% of the facilities on your Assessment Roll. Throughout the year you may be adding new listings. There may be times when you will be deleting names from the list. FDEP recommends that you do not delete anyone from the list unless you are absolutely sure there would be no potential for hazardous waste generation at the location. Do not delete facilities that have a verification inspection history.

Result: Your assessment roll will be up-to-date by adding and deleting facilities when necessary

2.3 Notification Procedures

Section 403.7234, F.S., directs all counties in the State to notify all known and potential small quantity generators identified on its Assessment Roll during the first year of the local hazardous waste management assessment. The notification is to inform those potential generators of their legal responsibilities regarding proper hazardous waste management practices and to provide a list of available hazardous waste management alternatives and waste reduction opportunities.

Notification is very important, especially because these procedures are linked to Section 403.727(3)(a), F.S., that says:

“...In any action by the department against a small hazardous waste generator for the improper disposal of hazardous wastes, a rebuttable presumption of improper disposal shall be created if the generator was notified pursuant to s. 403.7234; the generator shall then have the burden of proving that the disposal was proper. If the generator was not so notified, the burden of proving improper disposal shall be placed upon the department.”

This means that when notified by the county under the SQG ANV Program, the burden of proof for proper disposal resides with the generator. If not notified, the burden of proof for improper disposal is placed on FDEP.

Each year thereafter, newly identified SQGs that have not been notified previously should be notified. Newly identified SQGs can be notified during the on-site inspection process. When possible, integrate the notification procedures with the annual renewal of occupational business licenses. Notifications, whether through the U.S. mail, e-mail, business or occupational license office, or through on-site visits, shall include a Small Quantity Generator Notification Fact Sheet and a cover letter that:

1. Detail the legal responsibilities of the small quantity generator with regard to proper waste management practices, including penalties for noncompliance.
2. Include a list of hazardous waste management alternatives and waste reduction opportunities which are available to the small quantity generator.

Refer to the Appendix for a sample notification letter and Notification Fact Sheet.

Notification Steps:

1. Notify all known and potential SQGs on your Assessment Roll during the first year of the local hazardous waste management assessment. Notification options include
 - i. By U.S. mail
 - ii. By e-mail
 - iii. At business license permit or renewal
 - iv. On-site visit (hand delivery)
2. Each year thereafter, notify newly identified SQGs not notified previously, by the same means.
3. The notification procedures are repeated every five years.

2.4 Verification Procedures

Section 403.7225, F.S. directs all counties in the state to evaluate the waste management practices of all known and potential SQGs of hazardous waste identified on their Assessment Roll. Information collected includes the types, amounts, and disposal management of waste generated by SQGs. Verifications are to be conducted by on-site inspection of the facility.

Each year, counties are required to evaluate and verify the waste management practices of at least 20% of known and potential SQGs identified on their Assessment Roll. First the number of SQGs targeted for inspection for the coming state fiscal year (July 1-June 30) must be established by getting a total count of all entities on your Assessment Roll on or shortly before July 1. Select 20% of the names on the Assessment Roll to inspect by the following June 30.

Verification Steps:

1. Select 20% of all potential and known SQGs in the county (your Assessment Roll). It is recommended that the county coordinate with its FDEP District Office to jointly identify inspection priorities. Other suggestions include a cross-sectional survey of NAICS codes.
2. All SQGs on your Assessment Roll that have not been inspected in five years need to be re- inspected.
3. Verifications shall be made by on-site visits.
4. When conducting on-site verifications, county inspectors should request and examine documentation that identifies the types of waste generated and disposed. Documentation consists of the following:
 - a. Hazardous waste manifest.
 - b. For hazardous waste that is recycled, a contract with an FDEP authorized hazardous waste handler and the shipping document for each waste recycled.
 - c. Bill of lading from the transporter indicating shipment to a facility permitted to manage hazardous waste.
5. When conducting on-site verifications, county inspectors should check the SQG's EPA identification number, if applicable. All SQGs that generate more than 100 kilograms per month must have an EPA identification number and the number must match the facility location address.
6. County inspectors should provide Form 8700-12FL to all facilities that are classified as an SQG that generates between 100 and 1000 kilograms per month.

Additional information on conducting inspections can found in Section 3.

2.5 County Reporting Requirements

No later than June 30 of each year, each county shall provide to FDEP a summary of information on each potential and known SQG identified during the SQG ANV Program. Each county shall transmit the following to the Department, according to these Guidelines, which are established under Section 403.7226, F.S.:

1. A summary of the information gathered during its local hazardous waste assessment;
2. Information gathered from each SQG not notified or verified previously; and
3. Information gathered from on-site verifications at each facility.

Data collected from verifications must be entered into the SQG Data Management System (SQGDMS). The SQGDMS database is a web-based relational database developed for local governments that conduct the SQG ANV Program and used for housing information collected during facility verifications as required in Section 403.7226, F.S.

County programs, upon written approval from FDEP, may optionally develop their own SQGDMS Program for collecting and managing verification information. However, all

data submitted to FDEP, as required in Section 403.7236, F.S. must meet the file and data formats and quality control requirements specified in Appendix-File Specification Guide.

A cover letter shall be sent to FDEP no later than June 30 of each year. The letter shall include the following information:

1. The year that you started the current five-year cycle.
2. The method used to update the county assessment roll.
3. The method used to notify businesses of their waste management responsibilities and options as required in Section 403.7234, F.S.
4. The number of known and potential SQGs on your Assessment Roll used to base your 20% verification inspections.
5. The numbers of known and potential SQGs on your Assessment Roll that will be used to determine the number of verification inspections for next year.
6. A summary breakdown on your verification inspections as follows:

	Number	Verification Rate (%)
Assessment Roll		
On-Site Verification Inspections Conducted		
Total		(At least 20%)

3.0 Guide to Field Inspection

3.1 Inspector Training

FDEP provides inspector orientation training that includes both classroom and field training. All new county inspectors shall contact FDEP to schedule inspector orientation training. Additionally, 24 or 40 hour OSHA HAZWOPER training is required for all personnel that conduct SQG verification inspections. Forty hour HAZWOPER training is required for those employees wearing respirators. Eight hour HAZWOPER refresher training must be provided annually after the initial training.

3.2 Inspection Documentation

Inspections must be thorough, detailed, and well documented. You should keep detailed documentation either on your inspection form or in your field logbook. Photographs are the best form of documentation. Common problems are too few photographs, poor quality photos, and lack of identification of the subjects in the photographs. Make references in your notes when and where photographs were taken, and what the photographs depict. The thorough and detailed steps you take now may provide critical information to local, state or federal enforcement officials later.

3.3 Preparing To Go Into the Field

Good preparation in the office is the key to a smooth inspection. The more you know about the facilities that you are going to inspect the easier it will be to inspect them. Research the type of operation that will be inspected and familiarize yourself with the potential types of hazardous waste that can be generated. Check with other inspectors who may be familiar with the site already. Review any files that you may find for the facility. Go over your checklist and possibly a layout of the site. Leave information with your supervisor detailing which facilities you will be visiting and when you will return.

3.4 Inspector Safety and Training

It is the responsibility of the inspector to be familiar with the proper use of safety equipment. This includes safety vests, steel-toed boots, hard hats, earplugs, gloves and eye goggles. Eye protection should be used during all inspections. It is suggested that safety vests be worn in all high traffic areas, large construction or industrial sites. Wear a hard hat on all construction sites or sites where there is potential for falling objects. Use ear protection in noisy working areas. You should avoid handling hazardous material containers if possible. If the need arises, wear protective gloves. A good safety practice is to not wear your safety shoes into your office or home. You should put them on when you arrive at the inspection site. Your shoes should be returned and kept in a separate plastic bag within your field bag after your field inspection. Safety Equipment that should be in your Field Bag:

1. Cell phone/hand-held radio
2. Safety shoes (store shoes wrapped in a bag)
3. Safety glasses (keep in a bag or storage container)
4. Disposable gloves
5. Hard hat
6. Flashlight
7. Ear plugs
8. Disposable rags and/or antibacterial wipes
9. Sun protection
10. First-aid kit

Optional Safety Equipment that may be kept in your vehicle:

1. Fluorescent vest
2. Insect repellent
3. Water
4. CPR kit
5. Battery jumper cables
6. Breakdown reflectors
7. Fire extinguisher
8. Tire pressure gauge

3.5 Conducting the Inspection

Arrival

Inspections should be unannounced to best verify how the facility typically manages its hazardous wastes. You must identify yourself with official credentials and tell the facility representative that you are there to conduct an inspection to gather information about the types and amounts of wastes generated and the methods used for waste storage and disposal in accordance with Sections 403.091, 403.7225 and 403.7234 F.S. An inspection may be conducted only after consent from the owner, operator, or person in charge is received.

Document your arrival: date, time and personnel encountered. You may be asked to sign a visitor's log. However, **do not sign waivers or agreements affecting or limiting your authority to inspect, or liability waivers.**

However rare, access may be denied for certain valid reasons (e.g., lack of safety equipment or training). Do not be threatening, pushy or overbearing. If denied access, ask when you can come back – if that is a viable option. If you feel your safety is being compromised while at the facility, leave immediately. Specifically document the reason why you could not perform the inspection and make note of this on your inspection form or field book. Discuss the denial of site access with your supervisor to see if a referral to FDEP will be necessary. Refer to the Appendix on Florida Statutes that gives you the right to inspect a business.

Conduct an Introductory Meeting

Explain the inspection process and what you will be doing. Try providing an idea of how long it will take. Explain there will be certain records that you will need to review. Indicate that photographs may be taken.

Request to have a facility representative accompany you on the facility tour, preferably a representative who is familiar with the facility and its operations and who will be able to obtain documents or authorize corrective actions. If a facility representative is not available, still try to complete the inspection even though you may not have all your pertinent questions answered. If needed, request the facility provide you copies of receipts, paperwork, phone call follow-up, etc.

Keep your terminology general. Advise the facility representative that you will provide at least an oral report (written is better) covering the inspection before you leave.

Facility Tour

Start at the facility receiving area, or where the waste generating processes begin. Do not allow facility personnel to coordinate and guide the inspection. Keep your visual inspection in accordance with your inspection plan or strategy. Step-by-step procedures vary according to type of facility and objectives. However, be flexible enough to accommodate new information and conditions at a facility. Remember that you may not know all waste generation points. Focus on understanding waste generation and disposal management.

As you walk through the facility be aware of your surroundings, avoid safety hazards and check all potential locations of hazardous wastes. Do not sniff, smell or open drums or containers. Let the facility representative lead the way. Make a point of asking permission to open doors, lockers, shipping containers, etc. so that it is clear that the facility has granted permission to proceed. Otherwise ask the facility employee to open doors, lockers, containers, etc. If you find containers that do not have any identifying information on them don't hesitate to ask the facility employee what is in the container. This process may have to be repeated numerous times during an inspection but is necessary. Try not to touch anything unless it is necessary for the inspection. Wear disposable gloves if looking in trash containers or dumpsters.

Do not smoke or eat while conducting your inspection. Wash your hands as soon as practical and always before eating or smoking.

Carry pocket change with you to pay for soft drinks, coffee or phone calls. Do not accept anything free from the facility.

As you continue the tour, be certain that you understand the facility's processes. Do not be afraid to ask questions, but avoid writing as you are walking around the facility due to safety concerns. Pause to take notes or complete the checklist.

If possible, talk to employees if you need specific information about a specific area. For example, ask the painter how he cleans his paint guns, what he uses and where he puts his waste solvent and waste paint. The facility representative may not know the specifics of each operation. Always be friendly and courteous and keep safety in mind. It is also a good idea to put the employee at ease as you ask questions. Look at the person giving you an answer.

Always listen to employees as they answer questions for you. Let them finish the answer and then write down what you have been told. If necessary repeat back to the employee what you understood to be the answer. Don't be afraid to admit or say that you didn't understand the reply given to you and ask them once again to repeat the answer.

During the facility tour, look for containers of products or waste; this may indicate a hazardous waste stream. Inspect all buildings, sheds or trailers. While you are inspecting the facility, check trashcans and dumpsters for containers of hazardous waste, non-empty hazardous material or paint containers, non-empty aerosol cans, contaminated rags or wipes, oil filters, etc. Check floor drains and ask if the facility is on city sewer or a septic tank. Make notes of the answers and document discrepancies with photos. When you have completed the interior tour of the facility, try to walk the fence line, if possible. Also remember to ask the facility representative to show you anything that you may have missed or if there are any questions that you forgot to ask.

Field Note Tips

Include in your field notes, at a minimum, the following information: The date, time, facility name, facility address, the facility representative and any employees that you spoke with, your observations including smells or sounds that may serve to document violations.

Also briefly describe photos taken and briefly describe areas of the facility that were inspected. It is a good idea to keep track of observations by area. For example, document all of your observations in the paint shop under a section with a header of "Paint Shop." Describe how they clean their paint guns, where they store their waste paint and the paint employee you spoke with. Then you continue on to the paint booth with another header to separate the areas.

At larger facilities, it is a good idea to separate areas and buildings to keep track of observations. DEP Inspectors often put stars or asterisks in the margin of their notebook so that they can quickly return to a section of their notes when they are preparing the facility exit interview or inspection report. Also take note of any documentation that you may want to see at the end of the tour; you may want to make a mark on that page so that you will be able to find it quickly when you are going over your notes before the exit interview.

Include in your notes any information relative to the site; site entry procedures, events and contacts; site contacts' names, titles and phone numbers; deviations from any established procedure or protocol; interview notes; discussion of unusual conditions or problems; photograph or video log; items or materials taken or given.

Record on your inspection form or field logbook the types of solid and hazardous waste identified, how the waste is stored and how the waste is disposed. Use the waste, storage and disposal method codes needed to enter this information into SQGDMS. Refer to the sample inspection form in the Appendix.

Remember that your field notes may be public records so be objective and do not record opinions or negative remarks about employees of the facility.

Record Review

After you have finished with the facility tour, return to the facility representative's office to review the facility's records. Records to be reviewed include hazardous waste manifests, contracts with authorized hazardous waste handlers and shipping documents for hazardous waste that is recycled, bills of lading from a transporter indicating shipment to a permitted hazardous waste management or recycling facility, non-hazardous waste manifests, used oil receipts, battery receipts, Material Safety Data Sheets (MSDS), etc. There may be situations where there is little or no record of waste disposal. Document what you see when there is no paperwork. Follow the checklists that are appropriate for the type of facility that you are inspecting. Make copies of any documents that you feel are important or may be necessary in an enforcement case.

Review purchase records to help verify generator status. Invoices and MSDS's can be an indication of waste amounts and they should match what you were told during the facility tour. If documentation is not readily available, ask to have it faxed or mailed to you. County inspectors should check the business's EPA identification number, if applicable. All 100-1000kg/mo SQGs must have an EPA identification number and the number must match the facility location address. County inspectors should provide Form 8700-12FL to all entities that are classified as a 100-1000 kg/mo SQG.

Exit Interview

After you have finished with your record review, take a few minutes to complete all of your checklists. Discuss the results of your site visit. Include missing documentation the facility may need to obtain and send to you. Go over these items with the facility representative and encourage him or her to take notes and make a list. Decide on a time frame for submittal of the documents. If needed, decide on a time frame for any corrective actions that are required. It is recommended that the inspector ask the facility to correct the areas of deficiencies and provide written documentation that they have been corrected. A letter and photographs of the corrections are usually acceptable. Disposal documents may also be required, and an inspector may request proof of disposal.

Before leaving, review your observations and request any necessary clarifications. It usually is not the inspector's role to make conclusive compliance determinations to the facility. During your closing discussion, present and discuss preliminary findings. It is always a good idea **not to discuss tentative findings or potential enforcement actions**.

Inspectors should report any signs of dumping to the ground or threats to human health and safety to your supervisor and the appropriate FDEP District Office.

Work with your FDEP District Office to discuss and identify types of problems discovered during inspections that would trigger contacting them for follow-up.

3.6 Compliance Assistance

Inspectors can use the exit interview to suggest ways to properly manage wastes. Use this time to hand out available educational material that you may have.

Develop an SQG ANV Program Information Package that includes some of FDEP's publications such as:

- Small Quantity Generator Program Notification Cover Letter that introduces the SQG Assessment, Notification and Verification Program to the business;
- Notification of Regulated Activity Form 8700-12FL (if applicable);
- Florida's Handbook for Small Quantity Generators of Hazardous Waste;
- Fact Sheet for Conditionally Exempt Small Quantity Generators;
- Fact Sheet on the Management of Used Oil and Used Oil Filters;
- Antifreeze Guidance Fact Sheet;

- Mercury Containing Lamps Fact Sheet;
- Current list of licensed hazardous waste transporters, used oil transporters, mercury lamp and battery recyclers that service your area.
- P2 Guidance

Hazardous waste publications can be found on the FDEP Webpage.

3.7 Inspectors and Pollution Prevention (P2)

What is P2 and how can it help inspectors?

Governmental agencies sometimes believe that there are limits as to how much environmental improvement can be achieved under their media-specific pollution control programs, which emphasize management after pollutants have been generated. However, improved protection of human health and the environment can frequently be achieved, at no additional cost, by reducing or eliminating waste generation through source reduction and environmentally sound recycling practices, commonly referred to as pollution prevention.

Generally speaking, P2 is the use of materials, processes or practices that reduce or eliminate the creation of pollutants or wastes at the source. It includes practices that reduce the use of hazardous and non-hazardous materials, energy, water or other resources, as well as those that protect natural resources through conservation or more efficient use.

P2 avoids cross-media transfers of wastes and/or pollutants and is multimedia in scope. It addresses all types of wastes and environmental releases to air, water and land. P2 is a useful tool in encouraging and motivating the regulated community to understand and consider the full spectrum of its environmental costs and integrate these costs into its decision-making process.

During inspections, SQG inspectors have the opportunity to encourage organizations, facilities and individuals to fully utilize source reduction techniques in order to reduce risk to public health, safety, welfare and the environment. P2 also provides benefits to industries, including reduced regulatory burden and operational costs. For example, the regulatory burden upon a company can be reduced by assisting the company in reducing its waste generation status from SQG to CESQG status. To an SQG inspector this could be a very useful tool and benefit.

Common P2 opportunities:

- . Water reuse
- . Material reclamation
- . Energy efficiency
- . Process modification
- . Material substitution
- . Inventory controls

Preventative maintenance

3.8 What to Do When You Get Back to the Office

After you get back from your inspection you will want to organize and finalize your paperwork. Do follow-up on any items found during your inspection that may need to be referred to either FDEP, another department within your county, or another agency, such as abandoned wells or improper discharges to a septic or stormwater system.

It is recommended that you complete these tasks and enter your verification data into SQGDMS within 24 to 48 hours of conducting the verification inspection.

Use predefined inspection forms with codes designed to facilitate data collection and entry (see Appendix for an example). Using the forms helps maintain consistency as well as saving time in both the field and office. Some items must be determined separately, especially the NAICS codes. For consistency, a list of most used codes is essential especially if data entry is not done by the inspector.

Appendix

Applicable Florida Statutes

403.091 Inspections.--

(1)(a) Any duly authorized representative of the department may at any reasonable time enter and inspect, for the purpose of ascertaining the state of compliance with the law or rules and regulations of the department, any property, premises, or place, except a building which is used exclusively for a private residence, on or at which:

1. A hazardous waste generator, transporter, or facility or other air or water contaminant source;
2. A discharger, including any nondomestic discharger which introduces any pollutant into a publicly owned treatment works;
3. Any facility, as defined in s. [376.301](#); or
4. A resource recovery and management facility

is located or is being constructed or installed or where records which are required under this chapter, ss. [376.30](#)-376.317, or department rule are kept.

(b) Any duly authorized representative may at reasonable times have access to and copy any records required under this chapter or ss. [376.30](#)-376.317; inspect any monitoring equipment or method; sample for any pollutants as defined in s. [376.301](#), effluents, or wastes which the owner or operator of such source may be discharging or which may otherwise be located on or underlying the owner's or operator's property; and obtain any other information necessary to determine compliance with permit conditions or other requirements of this chapter, ss. [376.30](#)-376.317, or department rules.

(c) No person shall refuse reasonable entry or access to any authorized representative of the department who requests entry for purposes of inspection and who presents appropriate credentials; nor shall any person obstruct, hamper, or interfere with any such inspection. The owner or operator of the premises shall receive a report, if requested, setting forth all facts found which relate to compliance status.

(2) An inspection pursuant to subsection (1) may be conducted only after:

- (a) Consent for the inspection is received from the owner, operator, or person in charge; or
- (b) The appropriate inspection warrant as provided in this section is obtained.

(3)(a) An inspection warrant as authorized by this chapter may be issued by a judge of any county court or circuit court of this state which has jurisdiction of the place or thing to be searched.

(b) Upon proper affidavit being made, an inspection warrant may be issued under the provisions of this chapter or ss. [376.30](#)-376.317:

1. When it appears that the properties to be inspected may be connected with or contain evidence of the violation of any of the provisions of this chapter or ss. [376.30](#)-376.317 or any rule properly promulgated there under; or
2. When the inspection sought is an integral part of a larger scheme of systematic routine inspections which are necessary to, and consistent with, the continuing efforts of the department to ensure compliance with the provisions of this chapter or ss. [376.30](#)-376.317 and any rules adopted there under.
 - (c) The judge shall, before issuing the warrant, have the application for the warrant duly sworn to and subscribed by a representative of the department; and may receive further testimony from witnesses, supporting affidavits, or depositions in writing to support the application. The affidavit and further proof, if had or required, shall set forth the facts tending to establish the grounds specified in paragraph (b) or the reasons for believing that such grounds exist.
 - (d) Upon examination of the application and proofs submitted and if satisfied that cause exists for the issuing of the inspection warrant, the judge shall thereupon issue a warrant, signed by him or her with the name of his or her office, to any department representative, which warrant will authorize the representative forthwith to inspect the property described in the warrant.

History.--s. 10, ch. 67-436; ss. 26, 35, ch. 69-106; s. 1, ch. 80-302; s. 6, ch. 82-27; s. 26, ch. 84-338; s. 25, ch. 86-159; s. 9, ch. 89-188; s. 69, ch. 91-221; s. 3, ch. 97-103; s. 81, ch. 2007-5.

403.7225 Local hazardous waste management assessments.--

- (1) The Legislature recognizes that there is a need for identifying the amount, type, sources, and management of hazardous waste generated by small quantity generators in the state. There is also a need for facilitating responsible waste storage, transportation, volume reduction, recycling treatment, disposal, and the introduction of waste reduction opportunities to small quantity generators of hazardous waste. Responsible management of these wastes is imperative in order to protect the public health, safety, and welfare and the environment.
 - (2) The department shall establish guidelines for local hazardous waste management assessments and shall specify a standard format. The local hazardous waste management assessments shall include, but not be limited to, the identification of the following:
 - (a) All small quantity generators of hazardous waste within a county as defined pursuant to federal regulations under 40 C.F.R. part 260.10.
 - (b) The types and quantities of hazardous waste generated by small quantity generators within a county.
 - (c) Current hazardous waste management practices of small quantity generators within a county.
 - (d) Effective waste management practices for small quantity generators of hazardous waste.

(3) Each county or regional planning council shall coordinate the local hazardous waste management assessments within its jurisdiction according to guidelines established under s. [403.7226](#). If a county declines to perform the local hazardous waste management assessment, the county shall make arrangements with its regional planning council to perform the assessment.

(4) County-designated areas under the original assessments in which hazardous waste storage facilities have been located are recognized by the Legislature. However, this section does not prohibit a county from amending its comprehensive plan to designate other areas for this purpose, nor does this section prohibit construction of a facility on any other locally approved or state-approved site.

(5) No county may amend its comprehensive plan or undertake rezoning actions in order to prevent areas designated pursuant to subsection (4) from being used as hazardous waste storage facilities.

(6) Unless performed by the county pursuant to subsection (3), the regional planning councils shall upon successful arrangements with a county:

(a) Perform local hazardous waste management assessments;

(b) Provide any technical expertise needed by the counties in developing the assessments.

(7) The selection of a regional storage facility site during the original assessment will not preclude the siting of a storage facility at some other site which is locally or state approved.

(8) The department shall assemble the data collected from the local hazardous waste management assessments and determine if the needs of small quantity generators of hazardous waste will be met by in-state commercial hazardous waste facilities or if additional storage, treatment, or disposal facilities are needed in the state and which regions have the greatest need.

(9) Storage facility area selections, or regional storage facility site selections from the original assessments shall not prevent siting of storage or treatment facilities in any area of the state.

(10) Except as provided in this part, no local government law, ordinance, or rule pertaining to the subject of hazardous waste regulation may be more stringent than department rules adopted under the authority of this chapter.

(11) Local hazardous waste management assessments shall be renewed every 5 years, based on the schedule determined by the department. More frequent assessments shall not be required by the state. However, at their option, counties may update such assessments at more frequent intervals. The assessment rolls shall be brought up to date annually before the end of the 5-year interval by including the applicable names from department sources, occupational licenses, building permits, and from not less than one complete survey of the business pages of the county local telephone systems. The roll shall be updated continuously thereafter in the same manner.

(12) The Legislature recognizes the expense incurred by county governments in the proper identification, notification, and verification of small quantity generators of hazardous waste

within their jurisdictions. When required to support the local hazardous waste assessments required by this section, the small quantity generator notification and verification program required pursuant to s. [403.7234](#), and the reporting requirements of s. [403.7236](#), a county may impose a small quantity generator notification and verification surcharge of up to \$50 on the business or occupational license or renewal of any firm that is classified as a small quantity generator of hazardous wastes. A county may contract with or otherwise enter into an agreement with the county tax collector to collect the annual surcharge.

History.--s. 25, ch. 83-310; s. 34, ch. 84-338; s. 3, ch. 85-269; s. 11, ch. 87-374; s. 37, ch. 91-305; s. 40, ch. 93-207.

403.7226 Technical assistance by the department.--The department shall:

(1) Provide technical assistance to county governments and regional planning councils to ensure consistency in implementing local hazardous waste management assessments as provided in ss. [403.7225](#), [403.7234](#), and [403.7236](#). In order to ensure that each local assessment is properly implemented and that all information gathered during the assessment is uniformly compiled and documented, each county or regional planning council shall contact the department during the preparation of the local assessment to receive technical assistance. Each county or regional planning council shall follow guidelines established by the department, and adopted by rule as appropriate, in order to properly implement these assessments.

(2) Identify short-term needs and long-term needs for hazardous waste management for the state on the basis of the information gathered through the local hazardous waste management assessments and other information from state and federal regulatory agencies and sources. The state needs assessment must be ongoing and must be updated when new data concerning waste generation and waste management technologies become available.

History.--s. 26, ch. 83-310; s. 2, ch. 89-285; s. 41, ch. 93-207; s. 410, ch. 94-356; s. 22, ch. 2007-184.

403.7234 Small quantity generator notification and verification program.--

(1) Each county shall notify, according to guidelines established under s. [403.7226](#), each small quantity generator identified on its assessment roll, during the first year of the local hazardous waste management assessment. Annually thereafter, the county shall notify each small quantity generator not notified previously. The notification of small quantity generators shall:

(a) Detail the legal responsibilities of the small quantity generator with regard to proper waste management practices, including penalties for noncompliance.

(b) Include a list of hazardous waste management alternatives and waste reduction opportunities which are available to the small quantity generator.

(2) Alternatively, a county may perform this notification either through the mail or during the annual business licensing of new or existing facilities that potentially may generate hazardous waste.

(3) Counties shall collect information on the types, amounts, and management of waste generated by small quantity generators according to guidelines established under s. [403.7226](#).

(4) Within 30 days of receipt of a notification, which includes a survey form, a small quantity generator shall disclose its management practices and the types and quantities of waste to the county government. Annually, each county shall verify the management practices of at least 20 percent of its small quantity generators. The procedure for verification used by the county shall be developed as part of the guidance established by the department under s. [403.7226](#). The department may also regulate the waste management practices of small quantity generators in order to ensure proper management of hazardous waste in a manner consistent with federal requirements, except as provided under s. [403.804](#)(2).

(5) Any small quantity generator who does not comply with the requirements of subsection (4) and who has received a notification and survey in person or through one certified letter from the county is subject to a fine of between \$50 and \$100 per day for a maximum of 100 days. The county may collect such fines and deposit them in its general revenue fund. Fines collected by the county shall be used to carry out the notification and verification procedure established in this section. If there are excess funds after the notification and verification procedures have been completed, such funds shall be used for hazardous and solid waste management purposes only.

History.--s. 29, ch. 83-310; s. 35, ch. 84-338; s. 37, ch. 86-186; s. 12, ch. 87-374; s. 42, ch. 93-207.

403.7236 Local government information to be sent to the department.—

Each county shall transmit the following information to the department, according to guidelines established under s. [403.7226](#):

- (1) A summary of the information gathered during its local hazardous waste management assessment;
- (2) Information gathered from each small quantity generator not notified or verified previously; and
- (3) Onsite information gathered from each existing small quantity generator verification.

History.--s. 30, ch. 83-310; s. 4, ch. 85-269; s. 43, ch. 93-207.

403.7238 Expanded local hazardous waste management programs.--

(1) The Legislature recognizes the need for increased participation by local governments in ensuring that small quantity generators are properly managing their hazardous waste and that waste reduction opportunities are promoted and realized. In order to promote this participation, the department shall establish a grant program on a competitive basis for counties that meet the following criteria:

- (a) The county has established a funding mechanism to support its local hazardous waste management assessments and the expanded local hazardous waste management program.
- (b) The county has adopted a local ordinance approved by the department that addresses the compliance with and enforcement of the federal and state hazardous waste regulations for small quantity generators.

(c) The county has established a plan that is designed to reduce the generation of hazardous waste and hazardous emissions from local governmental agencies and departments.

(d) The county certifies that it will continue to implement its expanded local hazardous waste management assessment program after the grant assistance ceases.

(2) Grants are authorized to cover startup costs incurred to establish the expanded local hazardous waste management program, including training for personnel, and materials and equipment necessary for education, compliance activities, and program administration. The total costs of administration shall not exceed 10 percent of the county's grant award.

(3) The maximum amount of a grant for a county establishing an expanded local hazardous waste management program shall be \$50,000.

History.--s. 44, ch. 93-207; s. 3, ch. 97-98.

403.7265 Local hazardous waste collection program.--

(1) The Legislature recognizes the need for local governments to establish local hazardous waste management programs and local collection centers throughout the state. Local hazardous waste management programs are to educate and assist small businesses and households in properly managing the hazardous waste they generate. Local collection centers are to serve a purpose similar to the collection locations used in the amnesty days program described in s. [403.7264](#). Such collection centers are to be operated to provide a service to homeowners, farmers, and conditionally exempt small quantity generators to encourage proper hazardous waste management. Local collection centers will allow local governments the opportunity to provide a location for collection and temporary storage of small quantities of hazardous waste. A private hazardous waste management company should be responsible for collecting the waste within 90 days for transfer to a permitted recycling, disposal, or treatment facility. In time, local collection centers are to become privately operated businesses in order to reduce the burden of hazardous waste collection on local government.

(2) For the purposes of this section, the phrase:

(a) "Collection center" means a secured site approved by the department to be used as a base for a hazardous waste collection facility.

(b) "Regional collection center" means a facility permitted by the department for the storage of hazardous wastes.

(3) The department shall establish a grant program for local governments that desire to provide a local or regional hazardous waste collection center. Grants shall be authorized to cover collection center costs associated with capital outlay for preparing a facility or site to safely serve as a collection center and to cover costs of administration, public awareness, and local amnesty days programs. The total cost for administration and public awareness may not exceed 10 percent of the grant award. Grants shall be available on a competitive basis to local governments which:

(a) Comply with ss. [403.7225](#) and [403.7264](#);

- (b) Design a collection center which is approved by the department; and
- (c) Provide up to 33 percent of the capital outlay money needed for the facility as matching money.
- (4) The maximum amount of a grant for any local government participating in the development of a collection center is \$100,000. If a regional collection facility is designed, each participating county is eligible for up to \$100,000. The department may use up to 1 percent of the funds appropriated for the local hazardous waste collection center grant program for administrative costs and public education relating to proper hazardous waste management.
- (5) The department shall establish a cooperative collection center arrangement grant program enabling a local hazardous waste collection center grantee to receive a financial incentive for hosting an amnesty days program in a neighboring county that is currently unable to establish a permanent collection center, but desires a local hazardous waste collection. The grant may reimburse up to 75 percent of the neighboring county's amnesty days. Grants shall be available, on a competitive basis, to local governments that:
- (a) Have established operational hazardous waste collection centers and are willing to assume a host role, similar to that of the state in the amnesty days program described in s. [403.7264](#), in organizing a local hazardous waste collection in the neighboring county.
- (b) Enter into, and jointly submit, an interlocal agreement outlining department-established duties for both the host local government and neighboring county.
- (6) The maximum amount for the cooperative collection center arrangement grant is \$35,000, with a maximum amnesty days reimbursement of \$25,000, and a limit of \$10,000 for the host local government. The host local government may receive up to \$10,000 per cooperative collection center arrangement in addition to its maximum local hazardous waste collection center grant.
- (7) The department may establish an additional local project grant program enabling a local hazardous waste collection center grantee to receive funding for unique projects that improve the collection and lower the incidence of improper management of conditionally exempt or household hazardous waste. Eligible local governments may receive up to \$50,000 in grant funds for these unique and innovative projects, provided they match 25 percent of the grant amount. If the department finds that the project has statewide applicability and immediate benefits to other local hazardous waste collection programs in the state, matching funds are not required. This grant will not count toward the \$100,000 maximum grant amount for development of a collection center.
- (8) The department may use grant funds authorized under this section to assist local governments in carrying out the responsibilities and programs specified in ss. [403.7225](#), [403.7226](#), [403.7234](#), [403.7236](#), and [403.7238](#).

History.--s. 9, ch. 85-269; s. 40, ch. 86-186; s. 13, ch. 87-374; s. 8, ch. 88-393; s. 45, ch. 93-207; s. 29, ch. 2000-211; s. 26, ch. 2007-184.

Sample Notification Cover Letter and Fact Sheet

Address

Dear ***Insert County*** [Business Owner] or [Governmental Entity] :

Based on the nature of the work you perform, your facility has been identified as having the potential to generate a regulated waste. Because of this potential, ***(insert local agency name)*** is required under state law to notify you of your obligations to properly manage these wastes and to conduct an on-site survey of your waste management practices.

Sections 403.7225 and 403.7234, Florida Statutes (F.S.) establish the Local Hazardous Waste Assessments and the Small Quantity Generator Notification and Verification Program. A small quantity generator is defined in the code of federal regulations (40 CFR Part 260.10) as a generator that produces less than 1,000 kilograms (or approximately 2,200 pounds) of a hazardous waste in any calendar month. [The Florida Department of Environmental Protection (FDEP) adopts hazardous waste regulations from the CFR in Chapter 62-730, Florida Administrative Code (FAC),

The purposes of the Assessment, Notification and Verification Program are:

- To inform potential small quantity generators of their legal responsibilities regarding management of hazardous waste, and
- To obtain information from the generator concerning the quantity and types of hazardous wastes generated annually and the practices used to manage waste.

FDEP promulgates rules for hazardous waste management. For information on these regulations and the types of wastes classified as potentially hazardous, refer to the enclosed fact sheet. You may also call FDEP headquarters at (850) 245-8707 or contact the hazardous waste representative of the ***INSERT DISTRICT and phone number***. Additional information can be found on the FDEP web site at www.dep.state.fl.us/waste/categories/hazardous. Violations of these regulations may subject you to penalties of up to \$50,000 per day for non-compliance.

Due to the expense of properly disposing of hazardous waste and the liability that always remains with the generator, the best thing to do is to eliminate or reduce the amount of hazardous waste you generate.

If you have any questions regarding the Small Quantity Generator Assessment, Notification and Verification Program, contact ***(insert local agency, phone number and address)***.

Sincerely,

County Administrator
Enclosures

HOW SHOULD I MANAGE HAZARDOUS WASTES?

This fact sheet serves to help educate businesses and government on hazardous waste management. The information provides a general overview of requirements for conditionally exempt small quantity generators (CESQGs) and small quantity generators (SQGs). Facility owners are responsible for obtaining more complete information about applicable regulations. Misrepresentations or omissions on this fact sheet do not relieve any person from any requirement of federal regulations or Florida law.

All generators of waste materials are required by law to identify and evaluate their waste. Evaluating waste streams means determining whether or not the waste is hazardous. Evaluate each waste you produce using Step 1 below to determine whether you are a generator.

Step 1: Evaluate Your Waste

First, inventory and assemble information about your waste. An inventory consists of identifying all wastes that your facility discards including sewered and recycled waste, unusable products, and byproducts. Material Safety Data Sheets (MSDSs) for your raw materials can be used to help identify your waste. Your Trade Association may be a good source of information. They can provide assistance for evaluating your wastes as well as assistance in handling, packaging and labeling your waste. If you have no information about your waste, it may be necessary to have the waste analyzed by a laboratory.

Step 2: Determine Generator Size

The amount of all hazardous waste generated or accumulated at your business will determine which category you fit in. Each category has its own requirements for waste management.

If you generate less than 100 kilograms (kg) [220 pounds (lbs.)] per month of hazardous waste and no more than 1kg (2.2 lbs.) of acutely hazardous waste in a calendar month, you are a CESQG. Refer to the CESQG Requirements section for more information.

If you generate between 100 kg and 1,000 kg (220-2,200 lbs.) per month of hazardous waste and no more than 1kg (2.2 lbs.) of acutely hazardous waste in a calendar month, you are a regulated SQG. Refer to the SQG Requirements section for more information.

If you generate more than 1,000 kg (2,200 lbs.) per month of hazardous waste or more than 1kg (2.2 lbs.) of acutely hazardous waste in a calendar month, you are a large quantity generator (LQG).

For assistance contact the Florida Department of Environmental Protection (FDEP) headquarters at 850-245-8707.

CESQG REQUIREMENTS

1. Perform a hazardous waste determination on all your waste generated.
2. Do not generate more than allowed per calendar month.
3. Do not accumulate more than 1,000 kg on your site.
4. Dispose of your waste only at a site that is approved by FDEP
5. Keep waste disposal/management records at your facility for at least three years. Receipts must include name and address of the generator and the treatment, storage or disposal facility; type hazardous waste delivered; amount of hazardous waste delivered; and the date of shipment

SQG REQUIREMENTS

1. Perform a hazardous waste determination on all your waste generated.
2. Do not generate more than allowed per calendar month.
3. Obtain an EPA/FDEP Identification number. Application forms can be obtained from FDEP Tallahassee office or from any of the FDEP district offices or on the FDEP Web. The EPA/DEP I.D. number is site specific, so if you move to a new location you must get a new EPA/FDEP I.D. number.
4. Place waste in a compatible container in good condition and not leaking. Label each container with the words "Hazardous Waste".

¹Solid Waste facilities cannot accept these wastes pursuant to 62-701.300 F.A.C. Many counties have hazardous waste collection centers that will accept hazardous waste from CESQGs for a reduced fee during scheduled collections.

Contact your county solid waste agency or FDEP at 850-245-8707 for more information.

Include generator's name and address; federal waste code numbers; and date the waste was first put into the container (accumulation start date).

5. Store Waste Properly. Waste must be stored in compatible containers. Accumulate only up to the time and quantity limits.

- ✓ Keep containers closed.
 - ✓ Do not mix wastes.
 - ✓ Provide adequate aisle space for easy access and visibility
 - ✓ Containers must be inspected at least weekly to check for leaks and signs of corrosion.
 - ✓ Do not store waste more than 180 days from the accumulation start date.
6. Transport and Dispose of Waste Properly
Choose a licensed transporter that has met the following requirements:
- ✓ Obtained an EPA/FDEP I.D. number;
 - ✓ Use manifests;
 - ✓ Ability to clean up hazardous waste discharges during transportation-related incidents;
 - ✓ Documentation of financial liability. A list of commercial hazardous waste transporters can be found on the FDEP Web Page under Database Reports.

7. Manifests and Transport of Hazardous Waste. The Uniform Hazardous Waste Manifest is a multi-copy shipping document that must accompany hazardous waste shipments. The State of Florida requires the use of this manifest when disposing of hazardous waste.

8. Emergency Procedures Plan

- ✓ Designate an emergency coordinator;
- ✓ Post emergency information by the phone; and,
- ✓ Provide and document adequate training for personnel handling hazardous waste.

9. Preparedness and Prevention Plan.

- ✓ Maintain a safe work place;
- ✓ Accessible telephones;
- ✓ Maintain fire extinguishers and spill control equipment;
- ✓ Maintain aisle space in work area;
- ✓ Notify police, fire department, and state emergency response teams of the types of wastes handled at your facility.

10. Keep records for a minimum of three years:

- ✓ Manifests;
- ✓ Land Disposal Restriction (LDR) Forms;
- ✓ Manifest exception reports;
- ✓ Analytical and other reports;
- ✓ Training documents;
- ✓ Inspection logs and Correspondence

Example Hazardous Wastes

Antifreeze, Batteries, Corrosive Waste, Ignitable Waste, Inks, Lamps (fluorescent – HID) and Mercury Devices (thermostats, Manometers, switches/relays), • Metals such as Arsenic, Cadmium, Lead, Mercury, Silver
Paints, Photographic Wastewater, Reactive, Waste, Solvents, Toxic Waste, Used Oil (and Used Oil Filters)

HAZARDOUS WASTE MANAGEMENT OPTIONS

Hazardous waste management and off-site disposal can be challenging and expensive for small businesses. But not all hazardous waste must be shipped off site for treatment or disposal. There are a number of allowable ways that small businesses can minimize their hazardous waste on site. They are:

- Domestic Sewage Exclusion;
- Elementary Neutralization;
- Recycling;
- Treatment in Accumulation Containers; and
- Burning in Small Boilers and Industrial Furnaces

If after reviewing the information contained in this section, it looks like any of the five waste minimization methods could be effective at your facility, you should conduct further research at both the Federal and state level to confirm their allowance and understand the specific operational requirements. Information on whom to call and where to get further information is provided at the end of this section. Small businesses and government operations should remember that the waste minimization methods described in this section

should only be conducted as part of a comprehensive hazardous waste management program that addresses all regulatory requirements.

Regulatory Allowances for On-Site Waste Minimization

Generators should first try to reduce or eliminate waste generation through source reduction. Source reduction is synonymous with pollution prevention (P2) and includes any activity that reduces or eliminates the generation of hazardous waste at the source. When source reduction is not feasible then, when possible, waste should be recycled or treated to reduce the volume and toxicity of the waste. From a practical perspective, there are substantial incentives for source reduction and waste minimization; for example avoiding the high costs of disposing of hazardous waste and limiting liability concerns. Small generators should look for source reduction opportunities (e.g., through careful chemical purchasing and inventory control, substitution of hazardous chemicals with less hazardous replacements, etc.). In addition, generators can sometimes treat their hazardous waste to reduce the volume or toxicity of the waste. Typically, small entities do not have permits for treatment, storage or disposal of hazardous wastes since the permitting process is very burdensome and costly. However, state regulations do contain provisions for treating and disposing of hazardous waste on-site without a permit.

On-Site Disposal: As for disposal, there is an allowance that provides for certain wastes to be disposed of down the drain, even if they may be hazardous. Some wastes may be mixed with domestic sewage and discharged to a publicly owned treatment works (POTW) (see 40 CFR 261.4(a)(1)).

Florida Law adopts 40 CFR 261 by reference (see Rule 62-730.030, FAC). This exclusion is commonly called the “domestic sewage exclusion” (DSE). Essentially, a small business tied to a POTW may discharge waste down the drain as long as it is in compliance with all applicable wastewater standards. Applicable wastewater standards typically include national pretreatment standards (40 CFR 403.5), state limits and discharge limits imposed by the POTW. In some cases, wastes that meet the definition of hazardous may be acceptable for sewer disposal. Check with your local sewer authority for restrictions or prohibitions. Be aware that hazardous waste stored prior to discharge is regulated and dilution of waste in order to meet discharge limits is prohibited. The DSE is limited in its applicability. There are no other means of on-site disposal of hazardous waste available to hazardous waste generators. **Do not discharge this waste to a septic system.**

On-Site Treatment: There are several regulatory exclusions that allow generators to treat hazardous waste without a permit. Some of these treatment exclusions may be useful in furthering waste reduction efforts. Treating hazardous waste on-site in ways other than provided for in the regulatory exclusions subjects generators to extremely high fines (e.g., up to \$50,000 per day) and possible criminal penalties (i.e., jail time). **Before treating hazardous waste on site, generators must be absolutely sure that the treatment they are considering is allowed without a hazardous waste permit.** In addition, generators must ensure that they have proper procedures, equipment and skilled employees to conduct treatment safely and effectively on-site. EPA’s exclusions that allow generators to treat hazardous waste on-site without a permit are described below.

Elementary Neutralization: Elementary neutralization units (as defined in 40 CFR 260.10) may be used to neutralize D002 (corrosive) wastes without a hazardous waste permit. Two important points to remember are (1) elementary neutralization only refers to pH adjustment, and (2) neutralized waste should only be discharged down the drain if it meets all applicable Elementary Neutralization discharge standards. Check with your local sewer authority for restrictions or prohibitions. **Do not discharge this waste to a septic system.**

Recycling: Florida allows generators to recycle hazardous wastes without a permit. A material is “recycled” if it is used, reused or reclaimed [40 CFR 261.1(7)]. A material is “used or reused” if it is either (1) employed as an ingredient to make a product, or (2) employed in a particular function as an effective substitute for a commercial product. A material is “reclaimed” if it is processed to recover a useful product or if it is regenerated. Although recycling is a form of treatment, recycling is exempt from the requirement to obtain a treatment permit. 40 CFR 261.6 (1), states that “the recycling process is exempt from regulation.” Generators may be able to take advantage of this exemption by distilling solvents, reclaiming precious metals (e.g., silver) from solutions, or precipitating metal salts.

Treatment in Accumulation Containers: Generators may treat hazardous wastes in accumulation containers without obtaining a treatment permit provided the containers are managed in compliance with the container management standards in 40 CFR Part 265, Subpart I. Examples of treatment

in accumulation containers include precipitating heavy metals from solutions, and oxidation/reduction reactions. Remember, treatment residues may still require management as a hazardous waste and, residues destined for land disposal are subject to land disposal restriction (LDR) treatment standards (40 CFR 268). **Florida Law adopts 40 CFR 265 and 268 by reference (see Rules 62-730.180 and .183, FAC).**

Small Boilers and Industrial Furnaces: Florida Law adopts 40 CFR 266 by reference (see Rule 62-730.181, FAC). The “small-quantity on-site burner exemption” (40 CFR 266.108), which is part of the Boiler and Industrial Furnace (BIF) regulations, allows hazardous waste generators (small or large quantity) to burn small quantities of hazardous waste in an on-site boiler without a permit. The quantity of waste that can be burned onsite is determined by the “terrain -adjusted stack height” as described in the regulation and the boiler’s total fuel requirement. Some additional restrictions apply to the properties of waste that can be burned (i.e., Btu value) and small businesses taking advantage of this allowance are subject to simple notification and recordkeeping requirements. Before burning hazardous waste on site, consult not only with the state regulators: both the hazardous waste agency and the air pollution control agency.

Source: The information in this section was adapted from “Little Known But Allowable Ways to Deal with Hazardous Waste”, EPA 233 -B-00-002, May 2000

Florida Department of Environmental Protection
Division of Waste Management
2600 Blair Stone Rd.
Bob Martinez Center, MS-4555
Tallahassee, FL 32399-2400
Phone: 850-245-8707
<http://www.dep.state.fl.us/waste>

Sample County SQG ANV Program Inspection Form

FACILITY ID: _____	Facility Status	RCRA Status	Follow-Up
EPA ID: _____	<input type="checkbox"/> Active Generator	<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> None needed
OTHER ID: _____	<input type="checkbox"/> Inactive does not generate waste	<input type="checkbox"/> CESQG	<input type="checkbox"/> Reinspect
NAISC CODE: _____	<input type="checkbox"/> Out of Business	<input type="checkbox"/> SQG	<input type="checkbox"/> DEP referral
		<input type="checkbox"/> LQG	<input type="checkbox"/> Other (add comment)

INSPECTION DATE: _____ INSPECTOR: _____

VERIFIED BY: ONSITE PHONE CALL

Did you ask and receive consent to conduct this inspection from the facility representative? YES NO

Facility Name _____

Facility Location _____
 (Street) (City) (Zip)

Facility Contact _____

Contact Title _____

Phone () _____ Email _____ No. of Employees at Site _____

SITE INFORMATION: City Water Sewer Well Septic

Floor Drains: No Yes Number: _____ Routed to: _____

Tanks: No Yes Above Ground Below Ground Cap: _____ gal.

Registered: Yes No

RECORDS:

Records Available: No Yes Contingency Plan: No Yes

Training Plan: No Yes Emergency No. Posted: No Yes

WASTE CONTRACTORS:

HW: _____ EPA I/D _____ Records? Yes No

Oil: _____ EPA I/D _____ Receipts? Yes No

Other: _____ EPA I/D _____ Receipts? Yes No

<u>Waste Type</u>	<u>Waste Code</u>	<u>Max. Monthly Generated</u>	<u>Annual Quantity Generated</u>	<u>Units</u>	<u>Storage Method</u>	<u>Disposal Method</u>
Comments:Pesticides - Some examples are parathion, toxaphene, dieldrin, carbamates, and DDT.						
• Waste pesticides	EPRD	_____	_____	_____	_____	_____
• Washing and rinsing solutions containing pesticides	EMRD	_____	_____	_____	_____	_____
• Empty pesticide containers	EENU	_____	_____	_____	_____	_____
Wastewaters and Sludges with toxic solvents containing benzene, PERC, MEK, Vinyl chloride.						
• Wastewaters with other toxic solvents containing benzene, MEK, Vinyl chloride	OWOU	_____	_____	_____	_____	_____
• Condensate water from dry cleaners containing PERC	HWRT	_____	_____	_____	_____	_____
• Petroleum Contact Water condensate from tanks	GWEE	_____	_____	_____	_____	_____
• Sludge with toxic solvents chemical	OBOU	_____	_____	_____	_____	_____
Heavy Metals-wastes containing arsenic, barium, cadmium chromium, lead, mercury, selenium, or silver.						
• Dust containing heavy metals	MSHS	_____	_____	_____	_____	_____
• Scrap metal	MSEM	_____	_____	_____	_____	_____
• Lead Backings from x-rays, scrap amalgam	MSHU	_____	_____	_____	_____	_____
• Filters with heavy metals	MFHO	_____	_____	_____	_____	_____
• Wash, Rinse solutions containing heavy metals	MWHR	_____	_____	_____	_____	_____
• Antifreeze - Non Hazardous	AMNO	_____	_____	_____	_____	_____
• Antifreeze - Hazardous	AMEO	_____	_____	_____	_____	_____
• Sludge containing heavy metals	MBHR	_____	_____	_____	_____	_____
• Photographic wastes	FWHF	_____	_____	_____	_____	_____
• Photographic silver recovery canisters	FFEF	_____	_____	_____	_____	_____
• Photographic – Non Hazardous effluent	FWNF	_____	_____	_____	_____	_____
Inks containing flammable solvents and/or barium, cadmium, chromium, or lead						
• Waste ink-Flashpoint <140°F and heavy metals	IPMI	_____	_____	_____	_____	_____
• Waste ink-Flashpoint <140°F only	IPII	_____	_____	_____	_____	_____
• Waste ink containing heavy metals only	IPHI	_____	_____	_____	_____	_____
Paints						
• Ignitable only paint wastes containing flammable solvents (flash point less than 140°F)	PMIP	_____	_____	_____	_____	_____
• Mixed paint waste (ignitable/metals)	PMMP	_____	_____	_____	_____	_____
• Other paint waste containing heavy metals	PSHP	_____	_____	_____	_____	_____
• Paint waste containing toxic solvents such as methylene chloride, toluene, PCE, MEK	HMLG	_____	_____	_____	_____	_____
• Paint Booth Filters containing metals only	MFHO	_____	_____	_____	_____	_____
Solvents-Some examples are benzene, chlorobenzenes, toluene, trichloroethylene, perchloroethylene, and methylene chloride plus the still bottoms from the recovery of these solvents.						
• Spent solvents mixtures not elsewhere classified below	SMRA	_____	_____	_____	_____	_____
• Halogenated solvents containing chloro- or fluoro- in the solvent name	HMLG	_____	_____	_____	_____	_____
• Non-halogenated solvents such as toluene, MEK	NPLG	_____	_____	_____	_____	_____
• Solvent still bottoms	SBRT	_____	_____	_____	_____	_____
• Dry cleaning filters	HFLO	_____	_____	_____	_____	_____

<u>Waste Type</u>	<u>Waste Code</u>	<u>Max. Monthly Generated</u>	<u>Annual Quantity Generated</u>	<u>Units</u>	<u>Storage Method</u>	<u>Disposal Method</u>
• Rags/Absorbents contaminated w/ignitable only solvents	SRIG	_____	_____	_____	_____	_____
• Rags/Absorbents contaminated w/Non-halogenated only solvents	NRLG	_____	_____	_____	_____	_____
• Rags/Absorbents contaminated w/Halogenated only solvents	HRLG	_____	_____	_____	_____	_____
Reactive Wastes – For examples, cyanides (soluble cyanide salts), strong acids (hydrogen fluoride, sulfuric acid) or alkalis (sodium hydroxide) and spent plating wastes.						
• Reactive Wastewater	XMVU	_____	_____	_____	_____	_____
• Reactive Wastes-solid	XSVU	_____	_____	_____	_____	_____
Ignitable Wastes (other than solvents and solvents still bottoms) - for example, adhesives and epoxy resins.						
• Ignitable wastes (flash point less than 140°F)	OLIU	_____	_____	_____	_____	_____
• Discarded gasoline, diesel or other fuels	GPID	_____	_____	_____	_____	_____
Wood Preservatives						
• Wastewater treatment sludges containing pentachlorophenol, creosote, arsenic, chromium	WMHM	_____	_____	_____	_____	_____
Discarded, unused or off-spec commercial chemical products, container residues from these products.						
• Discarded, Unused or Off-spec	OPLD	_____	_____	_____	_____	_____
Batteries, Mercury Lamps and Devices						
• Lead-acid batteries	BDEB	_____	_____	_____	_____	_____
• Mercury, silver or lithium oxide batteries	RDHB	_____	_____	_____	_____	_____
• Rechargeable batteries containing NICAD, silver or lead	RDEB	_____	_____	_____	_____	_____
• Fluorescent lamps containing mercury	LDEB	_____	_____	_____	_____	_____
• Devices with mercury (thermostats, thermometers, switches)	TDEB	_____	_____	_____	_____	_____
Waste Explosives						
• Waste explosives	XDVD	_____	_____	_____	_____	_____
Oil, Grease and Lubricants						
• Used Oil, greases or lubricants	UPEO	_____	_____	_____	_____	_____
• Cutting Oil	UPEM	_____	_____	_____	_____	_____
• Oil contaminated with toxic solvents	UMEH	_____	_____	_____	_____	_____
• Used oil filters- crushed	UCNO	_____	_____	_____	_____	_____
• Used oil filters- uncrushed	UUNO	_____	_____	_____	_____	_____
• Fuel Filters	UFEO	_____	_____	_____	_____	_____
• Used Oil – Rags	UREH	_____	_____	_____	_____	_____
• Absorbents/Kitty Litter contaminated with Oil	UKEH	_____	_____	_____	_____	_____

Waste Comments:

STORAGE METHOD CODES

C1	0-9 Gallon
C3	10-39 Gallon
C5	40-more Gallon
CR	RCRA Bulk (tanker container)
GA	On/Above Ground
GB	Below Ground
GF	Floor/Inside
OG	Good/No Storage
OL	Solid Waste Container
OP	Parts Washer
OQ	Questionable
TA	Above Ground
TB	Below Ground
TV	Vat (Open)

UNIT TYPE

B	Barrel (35 gal)
D	Drum (55 gal)
G	Gallons
K	Kilograms
P	Pounds
T	Short Tons
U	Units
Y	Cubic yard
4	4' Fluorescent Tube

DISPOSAL METHOD CODES

ON-SITE	
AD	Awaiting Disposal-Planned
AN	No Management Plan
AO	Mixed w/Used Oil (CESQG)
BE	Evaporation Only
BF	HW Fuel Burn/Blend
BO	Open Burning
BU	Used Oil Burner
DD	Onsite Land Disposal
DG	Disposal to Groundwater
DP	Disposal to Sewer
DS	Disposal to Surface Water
DT	Disposal to Septic Tank
OE	Onsite Exempt Treatment
OR	Onsite Recycle/Reuse
OFF-SITE	
EC	Comm. Laundry
EE	Universal Waste
ER	Exempt Recycling
EU	Used Oil Recycling
HH	HW RCRA Treatment
HO	CESQG Collection
HQ	Questionable
HR	HW Recycling
SD	C&D Landfill
SF	WTE Facility
SL	Lined Landfill

SIC and NAICS Code Short List

SIC	SIC Description	NAICS	NAICS Description
AGRICULTURE PRODUCTION & LANDSCAPING			
0115	Corn	11115	Corn Farming (pt)
0131	Cotton	11192	Cotton Farming
0132	Tobacco	11191	Tobacco Farming
0133	Sugarcane and Sugar Beets		
0133	. Sugar Beets	111991	Sugar Beet Farming
0133	. Sugarcane	11193	Sugarcane Farming
0161	Vegetables and Melons	11219	Other Vegetable (except Potato) and Melon Farming (pt)
0191	General Farms, Primarily Crop	111998	All Other Miscellaneous Crop Farming (pt)
0211	Beef Cattle Feedlots	112112	Cattle Feedlots
0212	Beef Cattle, Except Feedlots	112111	Beef Cattle Ranching and Farming (pt)
0214	Sheep and Goats		
0214	. Sheep Farms	11241	Sheep Farming
0214	. Goat Farms	11242	Goat Farming
0219	General Livestock, Except Dairy and Poultry	11299	All Other Animal Production (pt)
0241	Dairy Farms		
0241	. Dairy Heifer Replacement Farms	112111	Beef Cattle Ranching and Farming (pt)
0241	. Dairy Farms	11212	Dairy Cattle and Milk Production
0291	General Farms, Primarily Livestock and Animal Specialties	11299	All Other Animal Production (pt)
0711	Soil Preparation Services	115112	Soil Preparation, Planting, and Cultivating (pt)
0721	Crop Planting, Cultivating, and Protecting	115112	Soil Preparation, Planting, and Cultivating (pt)
0722	Crop Harvesting, Primarily by Machine	115113	Crop Harvesting, Primarily by Machine
0741	Veterinary Services For Livestock	54194	Veterinary Services (pt)
0742	Veterinary Services for Animal Specialties	54194	Veterinary Services (pt)
0762	Farm Management Services	115116	Farm Management Services
0782	Lawn and Garden Services	56173	Landscaping Services (pt)
0783	Ornamental Shrub and Tree Services	56173	Landscaping Services (pt)
CONSTRUCTION			
1521	General Contractors-Single-Family Houses	23321	Single Family Housing Construction (pt)
1522	General Contractors-Residential Buildings, Other Than Single-Family		
1522	. Hotel and Motel Construction	23332	Commercial and Institutional Building Construction (pt)
1522	. Except Hotel and Motel Construction	23322	Multifamily Housing Construction (pt)
1531	Operative Builders		
1531	. Single Family Housing	23321	Single Family Housing Construction (pt)

1531	. Multifamily Housing	23322	Multifamily Housing Construction (pt)
1531	. Manufacturing and Light Industrial Buildings	23331	Manufacturing and Industrial Building Construction (pt)
1531	. Commercial and Institutional Buildings	23332	Commercial and Institutional Building Construction (pt)
1541	General Contractors-Industrial Buildings and Warehouses		
1541	. Public Warehouse Construction	23332	Commercial and Institutional Building Construction (pt)
1541	. Except Public Warehouse Construction	23331	Manufacturing and Industrial Building Construction (pt)
1542	General Contractors-Nonresidential Buildings, Other than Industrial Buildings and Warehouses	23332	Commercial and Institutional Building Construction (pt)
1611	Highway and Street Construction, Except Elevated Highways	23411	Highway and Street Construction (pt)
1711	Plumbing, Heating, and Air-Conditioning	23511	Plumbing, Heating, and Air-Conditioning Contractors (pt)
1721	Painting and Paper Hanging	23521	Painting and Wall Covering Contractors (pt)
1731	Electrical Work	23531	Electrical Contractors
1761	Roofing, Siding, and Sheet Metal Work	23561	Roofing, Siding, and Sheet Metal Contractors
MANUFACTURING			
2421	Sawmills and Planing Mills, General		
2421	. Lumber Manufacturing from Purchased Lumber, Softwood Cut Stock, Wood Lath and Planing Mill Products	321912	Cut Stock, Resawing Lumber, and Planing (pt)
2421	. Sawmills	321113	Sawmills (pt)
2421	. Softwood Flooring	321918	Other Millwork (including Flooring) (pt)
2421	. Kiln Drying	321999	All Other Miscellaneous Wood Product Manufacturing (pt)
2431	Millwork		
2431	. Wood Windows and Doors	321911	Wood Window and Door Manufacturing
2431	. Except Wood Windows and Doors	321918	Other Millwork (including Flooring) (pt)
2451	Mobile Homes	321991	Manufactured Home (Mobile Home) Manufacturing
2491	Wood Preserving	321114	Wood Preservation
2511	Wood Household Furniture, Except Upholstered		
2511	. Wood Box Spring Frames	337215	Showcase, Partition, Shelving, and Locker Manufacturing (pt)
2511	. Except Wood Box Spring Frames	337122	Nonupholstered Wood Household Furniture Manufacturing (pt)
2711	Newspapers: Publishing, or Publishing and Printing	51111	Newspaper Publishers
2721	Periodicals: Publishing, or Publishing and Printing	51112	Periodical Publishers (pt)
2731	Books: Publishing, or Publishing and Printing		
2731	. Music Book Publishing	51223	Music Publishers (pt)

2731	. All Other Book Publishers	51113	Book Publishers
2759	Commercial Printing, NEC		
2759	. Screen Printing	323113	Commercial Screen Printing (pt)
2759	. Flexographic Printing	323112	Commercial Flexographic Printing (pt)
2759	. Quick Printing	323114	Quick Printing (pt)
2759	. Digital Printing, except Quick Printing	323115	Digital Printing
2759	. Other Commercial Printing	323119	Other Commercial Printing (pt)
2951	Asphalt Paving Mixtures and Blocks	324121	Asphalt Paving Mixture and Block Manufacturing
3069	Fabricated Rubber Products, NEC		
3089	Plastics Products, NEC		
3271	Concrete Block and Brick	327331	Concrete Block and Brick Manufacturing
3272	Concrete Products, Except Block and Brick		
3272	. Dry Mixture Concrete	327999	All Other Miscellaneous Nonmetallic Mineral Product Manufacturing (pt)
3272	. Concrete Pipes	327332	Concrete Pipe Manufacturing
3272	. Other Concrete Products	32739	Other Concrete Product Manufacturing
3273	Ready-Mixed Concrete	32732	Ready-Mix Concrete Manufacturing
3312	Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills		
3312	. Coke Ovens, Not Integrated With Steel Mills	324199	All Other Petroleum and Coal Products Manufacturing (pt)
3312	. Hot Rolling Purchased Steel	331221	Rolled Steel Shape Manufacturing (pt)
3312	. Except Coke Ovens Not Integrated with Steel Mills and Hot Rolling Purchased Steel	331111	Iron and Steel Mills (pt)
3441	Fabricated Structural Metal	332312	Fabricated Structural Metal Manufacturing (pt)
3444	Sheet Metal Work		
3444	. Ducts, Flumes, Flooring, Siding, Dampers, etc.	332322	Sheet Metal Work Manufacturing
3444	. Metal Bins and Vats	332439	Other Metal Container Manufacturing (pt)
3444	. Cooling Towers	333414	Heating Equipment (except Warm Air Furnaces) Manufacturing (pt)
3449	Miscellaneous Structural Metal Work		
3449	. Custom Roll Forming	332114	Custom Roll Forming
3449	. Fabricated Bar Joists and Concrete Reinforcing Bars	332312	Fabricated Structural Metal Manufacturing (pt)
3449	. Curtain Wall	332321	Metal Window and Door Manufacturing (pt)
3449	. Metal Plaster Bases	332323	Ornamental and Architectural Metal Work Manufacturing (pt)
3471	Electroplating, Plating, Polishing, Anodizing, and Coloring	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring (pt)
3732	Boat Building and Repairing		
3732	. Boat Repair	81149	Other Personal and Household Goods Repair and Maintenance (pt)

3732	. Boat Building	336612	Boat Building
TRANSPORTATION & OTHER SERVICES			
4121	Taxicabs	48531	Taxi Service (pt)
4131	Intercity and Rural Bus Transportation	48521	Interurban and Rural Bus Transportation
4151	School Buses	48541	School and Employee Bus Transportation (pt)
4173	Terminal and Service Facilities for Motor Vehicle Passenger Transportation	48849	Other Support Activities for Road Transportation (pt)
4212	Local Trucking Without Storage		
4212	. Solid Waste Collection Without Disposal	562111	Solid Waste Collection
4212	. Hazardous Waste Collection Without Disposal	562112	Hazardous Waste Collection
4212	. Other Waste Collection Without Disposal	562119	Other Waste Collection
4212	. Local General Freight Trucking Without Storage	48411	General Freight Trucking, Local (pt)
4212	. Household Goods Moving Without Storage	48421	Used Household and Office Goods Moving (pt)
4212	. Local Specialized Freight Trucking Without Storage	48422	Specialized Freight (except Used Goods) Trucking, Local (pt)
4213	Trucking, Except Local		
4213	. Long-distance Truckload General Freight Trucking	484121	General Freight Trucking, Long-Distance, Truckload
4213	. Long-distance Less Than Truckload General Freight Trucking	484122	General Freight Trucking, Long-Distance, Less Than Truckload
4213	. Long-distance Household Goods Moving	48421	Used Household and Office Goods Moving (pt)
4213	. Long-distance Specialized Freight Trucking	48423	Specialized Freight (except Used Goods) Trucking, Long-Distance
4214	Local Trucking with Storage		
4214	. Local General Freight Trucking with Storage	48411	General Freight Trucking, Local (pt)
4214	. Local Household Goods Moving	48421	Used Household and Office Goods Moving (pt)
4214	. Local Specialized Freight Trucking with Storage	48422	Specialized Freight (except Used Goods) Trucking, Local (pt)
4231	Terminal and Joint Terminal Maintenance Facilities for Motor Freight Transportation	48849	Other Support Activities for Road Transportation (pt)
4311	United States Postal Service	49111	Postal Service (pt)
4491	Marine Cargo Handling		
4491	. Dock and Pier Operations	48831	Port and Harbor Operations (pt)
4491	. Except Dock and Pier Operations	48832	Marine Cargo Handling
4492	Towing and Tugboat Services	48833	Navigational Services to Shipping (pt)
4493	Marinas	71393	Marinas
45	Transportation by air		
4512	Air Transportation, Scheduled		
4512	. Scheduled Passenger Air	481111	Scheduled Passenger Air Transportation

	Transportation		
4512	. Scheduled Freight Air Transportation	481112	Scheduled Freight Air Transportation
4513	Air Courier Services	49211	Couriers (pt)
4581	Airports, Flying Fields, and Airport Terminal Services		
4581	. Air Traffic Control	488111	Air Traffic Control (pt)
4581	. Airfreight Handling at Airports, Hangar Operations, Airport Terminal Services, Aircraft Storage, Airports, and Flying Fields	488119	Other Airport Operations (pt)
4581	. Aircraft Cleaning and Janitorial Services	56172	Janitorial Services (pt)
4581	. Aircraft Servicing and Repairing	48819	Other Support Activities for Air Transportation
4813	Telephone Communications, Except Radiotelephone		
4813	. Except Resellers	51331	Wired Telecommunications Carriers (pt)
4813	. Wired Resellers	51333	Telecommunications Resellers (pt)
4813	. Satellite Resellers	51334	Satellite Telecommunications (pt)
4911	Electric Services		
4911	. Hydroelectric Power Generation	221111	Hydroelectric Power Generation (pt)
4911	. Electric Power Generation by Fossil Fuels	221112	Fossil Fuel Electric Power Generation (pt)
4911	. Electric Power Generation by Nuclear Fuels	221113	Nuclear Electric Power Generation (pt)
4911	. Other Electric Power Generation	221119	Other Electric Power Generation (pt)
4911	. Electric Power Transmission and Control	221121	Electric Bulk Power Transmission and Control (pt)
4911	. Electric Power Distribution	221122	Electric Power Distribution (pt)
4952	Sewerage Systems	22132	Sewage Treatment Facilities
4953	Refuse Systems		
4953	. Materials Recovery Facilities	56292	Materials Recovery Facilities
4953	. Hazardous Waste Treatment and Disposal	562211	Hazardous Waste Treatment and Disposal
4953	. Solid Waste Landfills	562212	Solid Waste Landfill
4953	. Solid Waste Combustors and Incinerators	562213	Solid Waste Combustors and Incinerators
4953	. Other Nonhazardous Waste Treatment and Disposal	562219	Other Nonhazardous Waste Treatment and Disposal
WHOLESALE TRADE			
5093	Scrap and Waste Materials	42193	Recyclable Material Wholesalers
5171	Petroleum Bulk Stations and Terminals		
5171	. Heating Oil Sold Via Retail Method	454311	Heating Oil Dealers (pt)
5171	. LP Gas Sold Via Retail Method	454312	Liquefied Petroleum Gas (Bottled Gas) Dealers (pt)
5171	. Sold Via Wholesale Method	42271	Petroleum Bulk Stations and Terminals
5311	Department Stores	45211	Department Stores
5511	Motor Vehicle Dealers (New and Used)	44111	New Car Dealers

5521	Motor Vehicle Dealers (Used Only)	44112	Used Car Dealers
5531	Auto and Home Supply Stores		
5531	. Tire Dealers	44132	Tire Dealers (pt)
5531	. Auto Supply Stores	44131	Automotive Parts and Accessories Stores (pt)
5531	. Other Auto and Home Supply Stores	45299	All Other General Merchandise (pt)
5541	Gasoline Service Stations		
5541	. With Convenience Store	44711	Gasoline Stations with Convenience Store (pt)
5541	. Except with Convenience Stores	44719	Other Gasoline Stations
5551	Boat Dealers	441222	Boat Dealers
5561	Recreational Vehicle Dealers	44121	Recreational Vehicle Dealers
5571	Motorcycle Dealers	441221	Motorcycle Dealers
5599	Automotive Dealers, NEC	441229	All Other Motor Vehicle Dealers
SERVICE INDUSTRIES			
7011	Hotels and Motels		
7011	. Hotels and Motels, except Casino Hotels	72111	Hotels (except Casino Hotels) and Motels (pt)
7011	. Casino Hotels	72112	Casino Hotels
7011	. Bed and Breakfast Inns	721191	Bed-and-Breakfast Inns
7011	. Other	721199	All Other Traveler Accommodation
7215	Coin-Operated Laundries and Drycleaning	81231	Coin-Operated Laundries and Drycleaners
7216	Drycleaning Plants, Except Rug Cleaning	81232	Drycleaning and Laundry Services (except Coin-Operated) (pt)
7217	Carpet and Upholstery Cleaning	56174	Carpet and Upholstery Cleaning Services
7221	Photographic Studios, Portrait	541921	Photography Studios, Portrait
7334	Photocopying and Duplicating Services		
7334	. Instant Printing	323114	Quick Printing (pt)
7334	. Photocopying and Duplicating Services, Except Instant Printing	561439	Other Business Service Centers (including Copy Shops) (pt)
7335	Commercial Photography	541922	Commercial Photography (pt)
7336	Commercial Art and Graphic Design	54143	Graphic Design Services (pt)
7342	Disinfecting and Pest Control Services		
7342	. Disinfecting Services	56172	Janitorial Services (pt)
7342	. Exterminating and Pest Control Services	56171	Exterminating and Pest Control Services (pt)
7349	Building Cleaning and Maintenance Services, NEC		
7349	. Lighting Maintenance Services	56179	Other Services to Buildings and Dwellings (pt)
7349	. Except Lighting Maintenance Services	56172	Janitorial Services (pt)
7359	Equipment Rental and Leasing, NEC		
7359	. Consumer Electronics and Appliances Rental	53221	Consumer Electronics and Appliances Rental
7359	. General Rental Centers	53231	General Rental Centers

7359	. Residential Furniture, Party Supplies, and All Other Miscellaneous Consumer Goods Rental and Leasing	532299	All Other Consumer Goods Rental
7359	. Oilfield and Well Drilling Machinery and Equipment Rental and Leasing	532412	Construction, Mining, and Forestry Machinery and Equipment Rental and Leasing (pt)
7359	. Aircraft Rental and Leasing	532411	Commercial Air, Rail, and Water Transportation Equipment Rental and Leasing (pt)
7359	. Portable Toilet Rental	562991	Septic Tank and Related Services (pt)
7359	. Office Machinery and Equipment Rental and Leasing	53242	Office Machinery and Equipment Rental and Leasing (pt)
7359	. Industrial Trucks Rental and Leasing	53249	Other Commercial and Industrial Machinery and Equipment Rental and Leasing (pt)
7384	Photofinishing Laboratories		
7384	. Photofinishing Laboratories (Except 1-Hour)	812921	Photofinishing Laboratories (except One-Hour)
7384	. One-Hour Photofinishing	812922	One-Hour Photofinishing
7514	Passenger Car Rental	532111	Passenger Car Rental
7532	Top, Body, and Upholstery Repair Shops and Paint Shops	811121	Automotive Body, Paint, and Interior Repair and Maintenance
7533	Automotive Exhaust System Repair Shops	811112	Automotive Exhaust System Repair
7534	Tire Retreading and Repair Shops		
7534	. Retreading	326212	Tire Retreading
7534	. Repair	811198	All Other Automotive Repair and Maintenance (pt)
7536	Automotive Glass Replacement Shops	811122	Automotive Glass Replacement Shops (pt)
7537	Automotive Transmission Repair Shops	811113	Automotive Transmission Repair
7538	General Automotive Repair Shops	811111	General Automotive Repair
7539	Automotive Repair Shops, NEC	811118	Other Automotive Mechanical and Electrical Repair and Maintenance
7542	Carwashes	811192	Car Washes
7623	Refrigeration and Air-Conditioning Services and Repair Shops		
7623	. Retailing New Refrigerators from a Storefront and Repairing Refrigerators	443111	Household Appliance Stores (pt)
7623	. Commercial Refrigerator Equipment Repair	81131	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance (pt)
7623	. Except Commercial and Retailing New Refrigerators from a Storefront and Repairing Refrigerators	811412	Appliance Repair and Maintenance (pt)
7692	Welding Repair	81131	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance (pt)
7992	Public Golf Courses	71391	Golf Courses and Country Clubs (pt)
7996	Amusement Parks	71311	Amusement and Theme Parks

8011	Offices and Clinics of Doctors of Medicine		
8011	. Surgical and Emergency Centers	621493	Freestanding Ambulatory Surgical and Emergency Centers
8011	. HMO Medical Centers	621491	HMO Medical Centers
8011	. Offices of Physicians, Mental Health Specialists	621112	Offices of Physicians, Mental Health Specialists (pt)
8011	. Offices of Physicians Except Mental Health	621111	Offices of Physicians (except Mental Health Specialists) (pt)
8021	Offices and Clinics of Dentists	62121	Offices of Dentists
8062	General Medical and Surgical Hospitals	62211	General Medical and Surgical Hospitals (pt)
8063	Psychiatric Hospitals	62221	Psychiatric and Substance Abuse Hospitals (pt)
8071	Medical Laboratories		
8071	. Diagnostic Imaging Centers	621512	Diagnostic Imaging Centers
8071	. Medical Laboratories, Except Diagnostic Imaging Centers	621511	Medical Laboratories
8072	Dental Laboratories	339116	Dental Laboratories
8211	Elementary and Secondary Schools	61111	Elementary and Secondary Schools
8221	Colleges, Universities, and Professional Schools	61131	Colleges, Universities, and Professional Schools
8222	Junior Colleges and Technical Institutes	61121	Junior Colleges
8249	Vocational Schools, NEC		
8249	. Vocational Apprenticeship Training	611513	Apprenticeship Training
8249	. Aviation Schools	611512	Flight Training (pt)
8249	. Other Technical and Trade Schools	611519	Other Technical and Trade Schools (pt)
8299	Schools and Educational Services, NEC		
GOVERNMENT			
9131	Executive and Legislative Offices, Combined	92114	Executive and Legislative Offices, Combined
9199	General Government, NEC	92119	Other General Government Support
9221	Police Protection	92212	Police Protection
9223	Correctional Institutions	92214	Correctional Institutions
9224	Fire Protection	92216	Fire Protection
9431	Administration of Public Health Programs	92312	Administration of Public Health Programs
9511	Air and Water Resource and Solid Waste Management	92411	Administration of Air and Water Resource and Solid Waste Management Programs
9512	Land, Mineral, Wildlife, and Forest Conservation	92412	Administration of Conservation Programs
9621	Regulation and Administration of Transportation Programs	92612	Regulation and Administration of Transportation Programs
9641	Regulation of Agricultural Marketing and Commodities	62614	Regulation of Agricultural Marketing and Commodities
9661	Space Research and Technology	92711	Space Research and Technology
9711	National Security	92811	National Security

File Specification Guide

1.0 Introduction

This document describes the file specifications for reporting data for the Small Quantity Generator Assessment, Notification and Verification (SQG ANV) Program. The material in this guide covers annual data submissions by counties and regional planning councils (RPC) to DEP Headquarters. The file specifications in this guide are not intended to be used if you are entering data into the SQG Data Management System (SQGDMS) provided by the Department. Also, this guide is only intended to specify the file and data formats for the submission and is not intended to cover any procedural or programmatic issues.

This document is designed to be used for counties that have or are planning to develop their own SQG ANV Program data management system for entering business data gathered during site verifications.

1.1 Overview of Document

The *File Specification Guide for the SQG Assessment, Notification and Verification Program Data Submissions* is divided into three sections:

Section 1 (Introduction) defines the intended audience for this guide, and describes the general purpose and outline of this document.

Section 2 (Data Submission Overview) describes the overall characteristics for a data submission.

Section 3 (Technical Specifications) discusses the technical details of the data files and programs necessary for data submission.

Several appendices are included with this document. These appendices provide background material as well as detailed technical information necessary to properly prepare file submissions.

1.2 Intended Audience

The intended audience for this guide is any local government coordinator that is using its own software and procedures to enter and manage data collected as part of the SQG Assessment, Notification and Verification Program as specified in sections 403.7225, 403.7226, 403.7234, 403.7236 and 403.7238 ,Florida Statutes.

This document was written assuming the reader is 1) familiar with the *SQG Assessment, Notification and Verification Program guidelines and procedures* and 2) understands basic computer concepts and terminology.

1.3 Facility and Waste Information Form

The *SQG Program Data Management System* captures information on the following forms:

Facility Information Form

The facility Information form collects name, address and phone information for each facility verified. Additional required information collected is North American Industry Classification System (NAICS) coding, verification (inspection) date and inspector information. A unique facility identification number generated by the SQGDMS identifies each facility. Data from this form is submitted in a DBF or Flat File (SDF) format.

Waste Information Form

The waste information form is for reporting on-site hazardous and exempt waste generation, management and off-site shipment or on-site management. The waste identification and waste sequence numbers link this information to the facility information data for each waste generated. Data from this form is submitted in a DBF or Flat File (SDF) format.

1.4 Data Files

Information gathered from the SQG Data Management System is submitted to the Department through two DBF or Flat File (SDF) files. These files are called “Facility.dbf” and “Waste.dbf”. The facility information form contains information that relates to the waste information form in a one-to-many (1:n) relationship. The file structure for these files can be found in the Database Structures section.

The remainder of this document describes in detail the steps necessary to ensure a successful data submission including identifying what sites should be reported, the types of files that must be included with each submission and technical aspects of the file creation process.

1.5 Questions / Comments

Questions about this document should be directed to the Department of Environmental Protection, Hazardous Waste Regulation Section at 850-245-8707.

2.0 Data Submission Overview

2.1 Data Requirements

Information on potential and actual hazardous waste generators are collected via the SQGDMS Program through the facility information and waste information screens.

Certain information from each facility is required to be collected. Counties are encouraged to provide as much facility and waste data as possible. This information enhances the analytical usefulness of the data for hazardous waste reporting and planning.

All data elements must be properly formatted and meet required data quality standards to be loaded into the State SQGDMS. The data quality standards including the required

fields for both facility and waste information can be found in the Database Structures Data Assessment Edits sections.

2.2 Testing the Translation

It is the responsibility of the county SQG coordinator to correctly generate formatted files for inclusion in the State SQGDMS database.

Once the county has produced a complete set of data files, those files are submitted to the State SQG ANV Program Coordinator via a secure method of transfer. Methods of secure data transfer include File Transfer Protocol (FTP) from the county to state using encrypted e-mail, anonymous DEP FTP drop-off, CD-ROM or diskettes by mail. It is important that proper security procedures are enforced when submitting the verification data.

Before sending data to the State SQG ANV Program Coordinator, the following steps are suggested in order to ensure that the data transfer process proceeds smoothly:

- After the data have been written to the transfer media, the transfer media should be tested to ensure readability and correctness of the data.
- If physical media is used for transferring the data, the media should be completely and accurately labeled. Any information or instruction required to correctly retrieve the flat files from the medium must also be included.
- A backup copy of the data files should be retained as a record of the submission and for use in case the original submission is lost or damaged.
- The submission package should be shipped by a traceable means that provides a return receipt. The electronic media should be isolated in packaging that will protect it from magnetic and/or static electric disturbance.

2.3 Data Quality/Equivalency

The County's translator data must provide an accurate representation of hazardous waste activity for that County. In addition, the translator's data must pass a minimum set of data edits (see Database Structures) in order to provide information comparable to data gathered by the SQG Data Management System (SQGDMS) software and to be properly loaded into the State's SQGDMS database. Data failing to conform to the appropriate data quality edits will result in the entire data submission to the Department being rejected.

3.0 Technical Specifications

This section contains the standards that must be met when producing flat files for the Hazardous Waste Report data submission. Failure to meet these specifications will result in the rejection of the flat files and failure to load the data into the SQGDMS database.

3.1 Rules and Format Conventions Required for Data Submission Files

The following sections detail the correct field formats for the data in the submission files.

3.1.1 Alphanumeric Fields

Alphanumeric fields are identified in Database Structures section as Data Type "C" fields. Data Type "C" fields must be left justified with all trailing spaces filled with the space character (i.e., ASCII HEX 0x20 or ASCII Decimal 32).

Valid characters for alphanumeric fields are limited to:

~!#\$%^*()_+`-\=::?.,/' "@&1234567890ABCDEFGHIJKLMNPOQRSTUVWXYZ{}[]

As part of the load routines, all lowercase letters (a-z) will be converted to uppercase characters (A-Z). Lowercase letters will not cause a submission to be rejected, however the lowercase letters will be converted to uppercase characters.

3.1.2 Character formatted Integer Fields

Character formatted Integer fields are identified in the Database Structures section as Data Type "CI" fields. Data Type "CI" fields are ASCII character representations of numeric data that must be right justified. Allowed values for Integer Fields are number 0-9, and the space character (ASCII Hex 0x20 or ASCII Decimal 32).

Examples of incorrect and correct entries for an integer field defined with a length of five (5) are presented in Exhibit 2 below.

INCORRECT	CORRECT
1A	1
10,000	10000
750.25	0000750 or 750

Exhibit 2 Incorrect and Correct Integer Entries

3.1.3 Character formatted Fixed Decimal Fields

Character formatted fixed place decimal fields are identified in the Database Structures section as Data Type "CD" fields.

For all "CD" field entries, the flat file specifications indicate the number of digits before the decimal and the number of digits after decimal that the data element is allowed. For example, CD4.2 indicates that the number may have up to 4 digits before the decimal and 2 digits after the decimal (9999.99). The period (.) character, representing the decimal must be included for fixed decimal fields. The field length includes the decimal character.

Allowed values for Fixed Decimal Fields are number 0-9, the decimal character ".", and the space character (ASCII Hex 0x20 or ASCII Decimal 32). Exhibit 3 shows incorrect and correct entries in a type "CD5.2" field.

INCORRECT	CORRECT
10,032.1	10032.10
98765	98765.00

Exhibit 3 Incorrect and Correct Fixed Decimal Entries

3.1.4 Logical Fields

Logical fields are identified in the Database Structures section as Data Type "L" fields.

For all "L" field entries, the flat file specifications represent the true state as the ASCII letter "T" character and the false state as the ASCII letter "F" character. Entries submitted as DBF files should format this field as a Foxpro or other Xbase logical field.

Allowed flat file values for Logical Fields are ASCII letter "T" character, the ASCII letter "F" character, and the space character (ASCII Hex 0x20 or ASCII Decimal 32). The Logical fields are all optional and are not required for submission unless the county wishes to.

3.1.5 Negative Numbers

Negative numbers are not allowed in the data submission.

3.1.6 Deleted Records

For records that have been deleted, the FA_UTYPE field must begin with the letter "D".

3.1.7 Changed Records

For records that have been changed since they were first added, the FA_UTYPE field must begin with the letter "C".

3.1.8 Added Records

For records that have been added and never changed, the FA_UTYPE field must begin with the letter "A".

3.1.9 Empty Fields

For fields that require no response, the field should be filled with the space character (i.e., blanks).

3.1.10 Flat File Hierarchy

The Facility flat file uses one key (Fa_num) to identify each "Facility" being reported by a county. The Waste flat file uses two keys (Wa_num and Wa_seq) to identify each "waste" being reported for a site. Thus, for each occurrence of the combined keys (Wa_num and Wa_seq) in the Waste flat file, there must be a corresponding record in the Facility file with the same Fa_num value as the Wa_num in the Waste record for the corresponding Facility. There may be many Waste records associated with a single

Facility record. The key (Fa_num) in the Facility flat file MUST be UNIQUE. The combined keys (Wa_num and Wa_seq) in the Waste flat file MUST be UNIQUE.

As an Example:

For the Facility (Fa_num=2500012) - There may be Several Waste records (Wa_num=2500012+Wa_seq=001),(Wa_num=2500012+Wa_seq=002),(Wa_num=2500012+Wa_seq=003) but another (Wa_num=2500012+Wa_seq=002) would be invalid.

If the Facility (Fa_num=0500315) does not exist or has been deleted- (FA_UTYPE begins with "D") Non-deleted (FA_UTYPE does not begin with "D") Waste records (Wa_num=2500315+Wa_seq=001) (Wa_num=2500315+Wa_seq=002) would be invalid

Database Structures

Facility Information Database Structure							
The facility Information form collects name, address and phone information for each facility verified. Additional required information collected is Standard Industrial Classification (SIC) coding, verification (inspection) date and inspector information. A unique facility identification number identifies each facility. Data from this form is submitted in a DBF or Flat File (SDF) format. *=Key Field							
Field No.	Field Name	Starting Column	Field Length	Data Type	Description	Required Field	Edit Number
1*	FA_NUM	1	7	C	The facility ID. The 2 digit county # (with leading 0s) followed by a sequential 5 digit facility #(with leading 0s).	Y	FAC000
2	FA_EPA	8	12	C	Facility's EPA Identification #. Format: (FL) + (D,R, Or A Number) + (9 Digits) SQG And LQG are required to have one by EPA, CESQGs are not	N	FAC010,FAC090
3	FA_OTHER	20	15	C	County or RPC ID # (may be used to do a yearly data import from an occupational license list, etc. , if desired)	N	
4	FA_NAME	35	40	C	Business Name	Y	FAC020
5	FA_STATUS	75	1	C	Facility Status, Ex, A=Active, I=Inactive, P=Potential, O= Out Of Business	Y	FAC015,FAC016
6	FA_FOLLOW	76	1	C	Facility Follow-Up, Ex N=None,V=Verify Or Re Inspect, Etc.	Y	FAC018
7	FA_ADDR	77	30	C	Facility Street Mailing Address	Y	FAC100
8	FA_CITY	107	20	C	Facility City Mailing Address	Y	FAC110
9	FA_ST	127	2	C	Facility State Mailing Address	Y	FAC120
10	FA_ZIP	129	9	C	Facility Zip Mailing Address	Y	FAC130,FAC135
11	FA_LADDR	138	30	C	Facility Street Location Address (or optionally street name)	Y	FAC040
12	FA_LOCAT	168	20	C	Facility City Location Address	Y	FAC050
13	FA_LZIP	188	9	C	Facility Zip Location Address	Y	FAC080,FAC085
14	FA_SIC	197	4	C	Standard Industrial Classification Code (SIC) of facility	Y	FAC210,FAC220
15	FA_EMPS	201	6	CI	Number of full time employees	N	
16	FA_GSTAT	207	1	C	Generator status (C,R,L) C=<100kg/mo:CESQG, R=100-1000kg/mo:SQG, L =>1000kg/mo:LQG (quantities are in any month in the year)	Y	FAC180

Facility Information Database Structure

The facility Information form collects name, address and phone information for each facility verified. Additional required information collected is Standard Industrial Classification (SIC) coding, verification (inspection) date and inspector information. A unique facility identification number identifies each facility. Data from this form is submitted in a DBF or Flat File (SDF) format. *=Key Field

Field No.	Field Name	Starting Column	Field Length	Data Type	Description	Required Field	Edit Number
17	FA_VTYPE	208	1	C	Verification type (V=Verification, P=Phone Call, S=Survey)	Y	FAC190
18	FA_VDATE	209	8	C	Date info was collected (YYYYMMDD)	Y	FAC280,FAC290
19	FA_OCONT	217	20	C	Person in the organization who made the contact	Y	FAC160
20	FA_ONAME	237	2	C	Organization code, County/RPC#	Y	FAC260
21	FA_FCONT	239	30	C	Facility contact person	Y	FAC150
22	FA_CTITLE	269	30	C	Title of facility contact person	Y	FAC270
23	FA_PHONE	299	10	C	Facility contact person phone #	Y	FAC170
24	FA_COMM1	309	78	C	Comments	N	
25	FA_COMM2	387	78	C	Comments	N	
26	FA_NEXTW	465	3	CI	Sequence # of the last waste record with leading 0's	N	
27	FA_TOTAL	468	15	CI	Amount of Hazardous Waste Produced/YR in pounds	N	FAC310
28	FA_QMGT	483	5	C	Combination of Disposal=00001, Storage=00010, No=00000;	Y	
29	FA_UPDATE	488	8	C	Date (YYYYMMDD) record was last added,changed, or deleted	Y	FAC320
30	FA_DOL	496	9	C	Dept. of Labor ID #	N	
31	FA_UTYPE	505	16	C	A,C,D for added/changed/deleted,space date sent to DEP (YYYYMMDD)	Y	FAC330
32	FA_LADNUM	521	10	C	Optional Location Address numeric indicator (like 1234 N Smith Street)	N	
33	FA_LADDR	531	4	C	Optional Location Address direction indicator (like 1234 N Smith Street)	N	
34	FA_LADTYPE	535	4	C	Optional Location Address road type indicator (like 1234 N Smith Street)	N	
35	FA_LASUITE	539	10	C	Optional Location Address Suite indicator (like 1234 N Smith Street, Bldg. A)	N	
Total Record Length:			549				

Waste Information Database Structure

The Waste Information database collects waste generation, storage, and management information for each facility verified. A unique facility identification number generated by the SQGDMS identifies each facility. Data from this form is submitted in a DBF format.

This file captures data elements that have a 1:n relationship to the reported facility. *=Key Field

Each record in the Waste file must contain a unique combination of the Facility ID Number and Waste Sequence number.

Field No.	Field Name	Starting Column	Field Length	Data Type	Description	Required Field	Edit Number
1*	WA_NUM	1	7	C	THE FACILITY ID. The 2 digit county # (with leading 0s) followed by a sequential 5 digit facility #(with leading 0s).	Y	WAS000,005
2*	WA_SEQ	8	3	C	A 3 digit SEQUENCE # (001,002,003...) (with leading 0s) ASSIGNED FOR EACH WASTE TYPE (STREAM) FOR THE FACILITY	Y	WAS010,015
3	WA_WCODE	11	2	C	OLD STYLE DEP WASTE TYPE CODE, EX A0, Y0, L1	N	WAS020,210
4	WA_AMT	13	10	CI	AMT OF WASTE (INCLUDING SOLID WASTE, OIL) PRODUCED PER YEAR, IN POUNDS	Y	WAS030
5	WA_MAX	23	10	CI	MAX AMOUNT OF HAZARDOUS WASTE PRODUCED PER MONTH, IN POUNDS	Y	WAS040
6	WA_SCODE	33	2	C	STORAGE TYPE CODE (ACTIVITY CODE FOR ACTIVITY)	Y	WAS050
7	WA_ONOFF	35	1	C	WHERE WASTE IS DISPOSED, O=ON-SITE, F=OFF-SITE	Y	WAS060
8	WA_DCODE	36	2	C	DISPOSAL TYPE CODE (RESOURCE CODE FOR ACTIVITY)	Y	WAS090
9	WA_UPDATE	38	8	C	DATE RECORD LAST ADDED, LAST CHANGED, OR DELETED (YYYYMMDD)	Y	WAS100
10	WA_TOTAL	46	10	CI	AMT OF HAZARDOUS WASTE (EXCLUDING SOLID WASTE, OIL) PRODUCED PER YEAR, IN POUNDS	Y	WAS110
11	WA_QMGT	56	5	CI	Combination of Disposal=00001, Storage=00010, No=00000;	Y	WAS120
12	WA_UNIT	61	1	C	UNIT TYPE FOR WASTE (DEFAULTS TO POUNDS)	N	WAS140
*13	WA_ANNUAL	62	12	CD9. 2	ANNUAL # UNITS OF WASTE (SOLID OR HAZ) PRODUCED (OR REDUCED FOR ACTIVITY) like 00523.60 or 34291.15	N	WAS150
*14	WA_MONTH	74	12	CD9. 2	MAXIMUM MONTHLY # UNITS OF WASTE PRODUCED (\$ FOR ACTIVITY)	N	WAS160
*15	WA_UTYPE	86	15	C	A,C, OR D FOR ADDED/CHANGED/DELETED,SPACE,DATE SENT TO DEP (YYYYMMDD) like 0052.36 or 3429.10	Y	WAS170
16	WA_COMM	101	78	C	COMMENTS FOR THIS WASTE STREAM (OR ACTIVITY)	N	
17	WA_NWCODE	179	4	C	NEW DEP MATRIX STYLE WASTE CODE - (ZZZZ =SITE WIDE ACTIVITY)	Y/N	WAS190,210

Waste Information Database Structure

The Waste Information database collects waste generation, storage, and management information for each facility verified. A unique facility identification number generated by the SQGDMS identifies each facility. Data from this form is submitted in a DBF format.

This file captures data elements that have a 1:n relationship to the reported facility. *=Key Field

Each record in the Waste file must contain a unique combination of the Facility ID Number and Waste Sequence number.

Field No.	Field Name	Starting Column	Field Length	Data Type	Description	Required Field	Edit Number
18	WA_CQUEST1	183	1	L	T OR F FOR THE FIRST DEFINED COUNTY DATA FIELD	N	
19	WA_CQUEST2	184	1	L	T OR F FOR THE SECOND DEFINED COUNTY DATA FIELD	N	
20	WA_CCODE	185	1	C	MULTIPLE CHOICE CHARACTER CODE FOR THE DEFINED COUNTY DATA FIELD	N	
21	WA_ACTREC	186	1	L	F or BLANK (" ") = WASTE RECORD T = ACTIVITY RECORD	N	
22	WA_EPA1	187	4	C	EPA HAZARDOUS WASTE CODES FOR THIS WASTE STREAM	N	WAS220
23	WA_EPA2	191	4	C	EPA HAZARDOUS WASTE CODES FOR THIS WASTE STREAM	N	WAS220
24	WA_EPA3	195	4	C	EPA HAZARDOUS WASTE CODES FOR THIS WASTE STREAM	N	WAS220
25	WA_EPA4	199	4	C	EPA HAZARDOUS WASTE CODES FOR THIS WASTE STREAM	N	WAS220
26	WA_EPA5	203	4	C	EPA HAZARDOUS WASTE CODES FOR THIS WASTE STREAM	N	WAS220
Total Record Length:			207				

Enhanced SQG Information Database Structure

The Enhanced SQG Information data table collects Enhanced facility inspection information for each facility verified under the Enhanced SQG program. A unique facility identification number links each activity to a facility. Data from this form is submitted in a DBF format.

This file captures data elements that have a 1:n relationship to the reported facility. *=Key Field

Each record in the Enhanced SQG Information data table must contain a unique VALID Facility ID Number as found in the facility table.

Field No.	Field Name	Starting Column	Field Length	Data Type	Description	Required Field	Edit Number
1*	ACT_NUM	1	7	C	THE FACILITY ID. The 2 digit county # (with leading 0s) followed by a sequential 5 digit facility #(with leading 0s).	Y	ACT001
2*	ACT_CODE	8	2	C	A 2 DIGIT activity code ASSIGNED FOR EACH ACTIVITY FOR THE FACILITY	Y	ACT010
3	ACT_DATE	10	8	D	DATE OF THE ACTIVITY (INSPECTION, PROBLEM FOUND, GUIDANCE GIVEN) in the format: YYYYMMDD	Y	ACT015
4	ACT_RTC	18	8	D	DATE THE ACTIVITY (PROBLEM FOUND) WAS RETURNED TO COMPLIANCE (empty if not in compliance) in the format: YYYYMMDD	Y	ACT020
Total Record Length:			26				

Data Assessment Edits

All data submitted must meet the appropriate data assessment edits. The data assessment edits for shared data elements applies only if the data is provided. For child table records, data assessment edits apply only if the record is being submitted.

B.1 Generic Data Edits

Edit Number	File Location	Edit Description	Select Logic*
GN000	All	A non-valid character was found in a character field.	CHARACTER = allowed value as specified in Section 3.1.1
GN010	All	Alphabetic character found in numeric field.	NUMERIC_DIGIT = allowed value as specified in Section 3.1.2 or Section 3.1.3
GN020	All	Duplicate records found in file submission.	Combination of key fields for specific file must be unique

B.2 Facility File Edits

Edit Number	Field Location	Edit Description	Select Logic*
FAC000	FA_NUM	The first two characters of the FACility_NUMber must match the county code for which data is being submitted.'01'-'67' with leading 0s (no blanks/spaces allowed)	SUBSTR(FA_NUM,1,2) = county code of submission >'00' <'68'
FAC010	FA_EPA	The EPA ID must pass the check digit routine if not blank.	See Appendix E
FAC015	FA_STATUS	The facility status must be 'I','O','N' or 'P' if there are no associated wastes	FA_STATUS = "I','O','N" or 'P' WHERE FA_NUM IN (SELECT WA_NUM FROM WASTE)'
FAC016	FA_STATUS	The facility status must be 'A', if there are associated wastes	FA_STATUS = "A" WHERE FA_NUM NOT IN (SELECT WA_NUM FROM WASTE)'
FAC018	FA_FOLLOW	The facility follow-up code must be non-blank if FA_VTYPE = 'V' or 'P'	FA_STATUS = "A" WHERE FA_NUM NOT IN (SELECT WA_NUM FROM WASTE)'
FAC020	FA_NAME	Handler name must be provided.	HANDLER_NAME <> ' '
FAC040	FA_LADDR	Location street must be provided.	FA_LADDR <> ' '
FAC050	FA_LOCAT	Location city, town or village must be provided.	FA_LOCAT <> ' '

Edit Number	Field Location	Edit Description	Select Logic*
FAC080	FA_LZIP	Location zip code must be provided.	FA_LZIP <> ''
FAC085	FA_LZIP	Location zip code must be in the range 32000-36000	FA_LZIP>32000 and FA_LZIP<36000
FAC090	FA_EPA	The state indicated in the site's EPA ID must be 'FL'	LEFT(FA_EPA,2) = 'FL'
FAC100	FA_ADDR	Mailing street must be provided.	FA_ADDR <> ' '
FAC110	FA_CITY	Mailing city, town or village must be provided.	FA_CITY <> ' '
FAC120	FA_STATE	Mailing state must be provided.	FA_STATE <> ' '
FAC130	FA_ZIP	Mailing zip code must be provided.	FA_ZIP <> ''
FAC135	FA_ZIP	Mailing zip code must contain only the characters 0, 1, 2, 3, 4, 5, 6, 7, 8, 9	FA_ZIP characters = '0', '1', '2', '3', '4', '5', '6', '7', '8', '9',
FAC150	FA_FCONT	Facility Contact name must be provided if FA_VTYPE = 'V' or 'P'.	FA_FCONT<> ' '
FAC160	FA_OCONT	Organization Contact name be provided if FA_VTYPE = 'V' or 'P'.	FA_OCONT <> ' '
FAC170	FA_PHONE	Contact phone number must be provided if FA_VTYPE = 'V' or 'P'.	FA_PHONE <> ' '
FAC180	FA_GSTAT	Generator of hazardous waste indicator must equal L' or 'R' or 'C' or 'N' if FA_VTYPE = 'V' or 'P'	FA_GSTAT = 'L' or 'R' or 'C' or 'N'
FAC190	FA_VTYPE	Verification type indicator must equal 'V','P','S' or 'C' if there are associated wastes.	FA_VTYPE = 'V','P','S' or 'C'
FAC210	FA_SIC	SIC code must be a 4-character code representing a number greater than zero. Like '0112'	FA_SIC > 0
FAC220	FA_SIC	Standard Industry Classification system code must be a value specified at http://www.census.gov/epcd/naics/naicscod.txt .	SIC_CODE = naics code specified at http://www.census.gov/epcd/naics/naicscod.txt
FAC260	FA_ONAME	Verifying Organization Code must be '01' to '79' with leading 0's if FA_VTYPE = 'V' or 'P'	FA_ONAME <'80',> '00' WHERE FA_VTYPE = 'V' or 'P'
FAC270	FA_CTITLE	Contact title must be provided if FA_VTYPE = 'V' or 'P'	FA_CTITLE <> ' 'WHERE FA_VTYPE = 'V' or 'P'
FAC280	FA_VDATE	Date verified must be a valid date if FA_VTYPE = 'V' or 'P'	FA_VDATE = valid_date WHERE FA_VTYPE = 'V' or 'P'
FAC290	FA_VDATE	Date verified must be > '19800101 if provided'	FA_VDATE >'19800101'
FAC300	FA_VDATE	Date verified must be < date received by FDEP	FA_VDATE <DATE()

Edit Number	Field Location	Edit Description	Select Logic*
FAC310	FA_TOTAL	Total Hazardous Waste must be '0000000000000000'-'999999999999999'	FA_TOTAL >='0000000000000000', <='999999999999999'
FAC320	FA_UPDATE	Date updated must be > '19800101'	FA_UPDATE = valid_date WHERE FA_VTYPE = 'V' or 'P'
FAC330	FA_UTYPE	Facility update type must start with 'A', 'C', or 'D'	LEFT(FA_UTYPE,1) = 'A', 'C', or 'D'

B.3 Waste File Edits

Edit Number	Field Location	Edit Description	Select Logic*
WAS001	WA_NUM	WA_NUM must be a 7 digit character string representing a number > 0 (like "0200021") with leading 0s (no blanks/spaces allowed)	Val(WA_NUM) > 100000 and LEFT(WA_NUM,1) <> "
WAS005	WA_NUM	Waste records are present, but corresponding record does not exist in the Facility file. No matching facility number found. (match is exact with leading 0s)	WA_NUM IN (SELECT FA_NUM FROM FACILITY)
WAS010	WA_SEQ	Waste sequence number must be a 3-digit character string representing a number greater than zero. with leading 0s (no blanks/spaces allowed)	VAL(WA_SEQ) > 0 AND LEN(ALLTRIM(WA_SEQ)) = 3
WAS015	WA_NUM + WA_SEQ	WA_NUM + Waste sequence number must be UNIQUE.	WA_NUM+WA_SEQ not duplicated
WAS020	WA_WCODE	Old Waste code must be a DEP waste code value specified in Appendix D or blank (space characters).	WA_WCODE IN (SELECT OLDWASTECODE FROM LIST)
WAS030	WA_AMT	Annual POUNDS. generated must be greater than '0000000000' and less than or equal to '9999999999'	WA_AMT >'0000000000' and WA_AMT <='9999999999'
WAS040	WA_MAX	Maximum monthly POUNDS. generated must be greater than '0000000000' and less than or equal to '9999999999'	WA_MAX >'0000000000' and WA_MAX <='9999999999'
WAS050	WA_SCODE	Waste storage code must be a DEP waste storage code value specified in Appendix F	WA_SCODE IN (SELECT STORAGECODE FROM LIST)
WAS060	WA_ONOFF	Waste managed on or off site indicator must be 'O' or 'F' (On-site or off-site)	WA_ONOFF = 'O' or 'F'
WAS090	WA_DCODE	Waste disposal code must be a DEP waste disposal code value specified in Appendix F	WA_DCODE IN (SELECT DISPOSALCODE FROM LIST)
WAS100	WA_UPDATE	Date updated must be a valid date > '19800101' and less than the date received by DEP	WA_UPDATE > '19800101' and WA_UPDATE < DATE()
WAS110	WA_TOTAL	Total hazardous pounds generated must be greater than '0000000000' and less than or equal to '9999999999'	WA_TOTAL >'0000000000' and WA_TOTAL <='9999999999'
WAS120	WA_QMGT	Combination of Disposal='00001', Storage='00010', No='00000'; .each digit must be "0" or "1"	LEN(ALLTRIM(WA_QMGT)) = 5 AND SUBSTR(WA_QMGT,{1 TO 5},1) = '1' OR '0'

Edit Number	Field Location	Edit Description	Select Logic*
WAS140	WA_UNIT	Generated quantity UNIT of measure must equal 'U', 'P', 'G', 'D', 'B', 'Y', 'T', '4', 'Y' or 'K'. OR BLANK (space character)	WA_UNIT= 'U', 'P', 'G', 'D', 'B', 'Y', 'T', '4', 'Y' or 'K'.
WAS150	WA_ANNUAL	Total UNITS generated must be greater than '00000000' and less than or equal to '99999999' OR BLANK (space character)	WA_ANNUAL >'00000000' and WA_ANNUAL <='99999999'
WAS160	WA_MONTH	Maximum monthly UNITS generated must be greater than '00000000' and less than or equal to '99999999' OR BLANK (space character)	WA_MONTH >'00000000' and WA_MONTH <='99999999'
WAS170	WA_UTYPE	Waste update type must be 'A', 'C', or 'D' optionally followed by the valid date this record was shipped to DEP	LEFT(WA_UTYPE,1) = 'A', 'C', or 'D'
WAS190	WA_NWCODE	New Waste code must be a DEP waste code value specified in Appendix E or blank.	WA_NWCODE IN (SELECT NEWWASTECODE FROM LIST)
WAS210	WA_WCODE WA_NWCODE	Either an old or new waste code must be specified.	!EMPTY(WA_WCODE+WA_NWCODE)
WAS220	WA_EPA1- WA_EPA5	The EPA hazardous waste code must be a waste code value specified in the 2001 Hazardous Waste Report Instructions and Forms or blank.	WA_EPA{1-5} = value specified in the 2001 Hazardous Waste Report Instructions and Forms or ''

B.4 Enhanced SQG Activity File Edits

Edit Number	Field Location	Edit Description	Select Logic*
ACT001	ACT_NUM	ACT_NUM must be a 7 digit character string representing a number > 0 (like "0200021") with leading 0s (no blanks/spaces allowed)	Val(WA_NUM) > 100000 and LEFT(WA_NUM,1) <> " "
ACT 005	ACT_NUM	Activity records are present, but corresponding record does not exist in the Facility file. No matching facility number found. (match is exact with leading 0s)	WA_NUM IN (SELECT FA_NUM FROM FACILITY)
ACT 010	ACT_CODE	Activity Code must match the list of valid Activities	ACT_CODE in Act_Code_Table
ACT 015	ACT_DATE	ACT_DATE Must be a valid date > 1/1/2005 and <= date of file submission	ACT_DATE > 1/1/2005 and <= date(now)
ACT 020	ACT_RTC	ACT_RTC Must be a valid date > 1/1/2005 and <= date of file submission	ACT_DATE > 1/1/2005 and <= date(now)

EPA ID Check Digit Routine

C.1 Characteristics of an EPA ID

All EPA ID's must meet the following requirements:

- Only characters A-Z, 0-9 and blank are allowed
- The first two characters must be 'FL'
- If the third character of the EPA ID is 'D' or 'R', the EPA ID must pass the Modulus 10 check digit routine below.
- If the third character of the EPA ID is 0-9, the EPA ID must pass the Modulus 10 check digit routine or the alternate check digit routine below.

C.2 Parts of an EPA ID

POSITIONS IN THE ID	DATA	ALLOWED VALUES
1-2	State Postal Code	Alphabetic characters only, must be valid state postal code (see Appendix H)
3	Site designation	A-Z, 0-9
4-11	ID digits	A-Z, 0-9, or blank
12	Check digit	A-Z, 0-9, or blank

C.3 Modulus 10 Check Digit Routine

The Modulus 10 check digit is calculated according to the following algorithm:

RCRAInfo identifies the number in the 4th through 11th positions of the ID.

Example ID: MDD001947308 4th - 11th positions: 00194730

The combination of digits used to create the check digit is 12121212.

In order to determine / verify the 12th check digit:

- Multiply each digit in the check combination by its positional mate.

0	0	1	9	4	7	3	0	
X 1	X 2	X 1	X 2	X 1	X 2	X 1	X 2	
0 +	0 +	1 +	1 + 8	4 +	1 + 4	3 +	0	22
			+		+			

- Sum the products, treating each one as a separate number (i.e. 18 becomes 1 and 8). In the example, the total is 22.

- Subtract this total (22) from the next highest multiple of 10 (i.e. 30 in this case).

$$30 - 22 = 8$$

$$\text{Check digit} = 8$$

(Note: If the result is 10, the check digit is zero).

C.4 Alternate Check Digit Routine

The check digit for Ids containing a digit (0-9) in the third character of the EPA ID must pass EITHER the Modulus 10 check digit routine or the following alternate check digit routine:

- The value of the number in the 12th position of the ID is added to the previously calculated sum (from Step 3 above).
- The resulting sum is subtracted from the next higher multiple of 10.
- The result of the subtraction is compared to the value in the 3rd position in the EPA ID. If the values match, the EPA ID passes the alternate check digit routine.

C.5 Example Check Digit Calculations

The following table presents several examples of check digit calculations for illustration.

EPA ID	PASS/FAIL	COMMENTS
FLD123456782	Pass	Check sum is 38. Subtract 38 from next higher multiple of 10 (40) and compare to 12 th position of ID. $40-38 = 2 = 12^{\text{th}}$ position, therefore EPA ID passes check digit.
FLD223456782	Fail	Check sum is 39. Subtract 39 from next higher multiple of 10 (40) and compare to 12 th position of ID. $40-39 = 1$, which is not equal to the 12 th position (2), therefore EPA ID fails check digit.
FL1123456782	Pass	Check sum is 38. Subtract 38 from next higher multiple of 10 (40) and compare to 12 th position of ID. $40-38 = 2 = 12^{\text{th}}$ position, therefore EPA ID passes check digit.
FL9123456783	Pass	<p>Check sum is 38. Subtract 38 from next higher multiple of 10 (40) and compare to 12th position of ID. $40-38 = 2$, which is not equal to the 12th position (3), therefore EPA ID fails first check digit routine. Since the value in the 3rd position is numeric, the alternate check digit routine applies.</p> <p>For the alternate check digit routine, the check sum is $38+3=41$. The check sum is subtracted from the next higher multiple of 10 (50) and compared to the value in the 3rd position. In this case, the calculation is $50-41=9$, which equals the 3rd position. Therefore, the EPA ID passes the check digit routine.</p>
FL8123456783	Fail	<p>Check sum is 38. Subtract 38 from next higher multiple of 10 (40) and compare to 12th position of ID. $40-38 = 2$, which is not equal to the 12th position (3), therefore EPA ID fails first check digit routine. Since the value in the 3rd position is numeric, the alternate check digit routine applies.</p> <p>For the alternate check digit routine, the check sum is $38+3=41$. The check sum is subtracted from the next higher multiple of 10 (50) and compared to the value in the 3rd position. In this case, the calculation is $50-41=9$, which does not equal the 3rd position (8). Therefore, the EPA ID fails the check digit routine.</p>

Valid Old Style Waste Codes

Code Description

- A0 TOXIC PESTICIDE WASTES D,U LIST -Use when discarded U-listed or characteristic pesticides are not mixed with any other substances (i.e.: water, dirt). 2200 Lbs of hazardous waste generated in one month will make this site an LQG for that month.
- A1 ACUTE PESTICIDE WASTES P LIST -Use when discarded P-listed pesticides are not mixed with any other substances (i.e.: water, dirt). 2.2 Lbs of acute hazardous waste generated in one month will make this site an LQG for that month.
- B0 PESTICIDE WASTE MIXTURES/WATERS -Use when hazardous pesticides are mixed with other substances for application and then discarded as a characteristically Hazardous Waste (TCLP): includes container rinsate and fertilizer/dry mixes.
- B1 TOXIC PESTICIDE SPILL CLEANUP D,U LIST -Use when characteristically hazardous or U-listed (toxic) pesticides are spilled and cleaned up with other substances: includes contaminated water and dirt.
- B2 ACUTE PESTICIDE SPILL CLEANUP P LIST -Use when or P-listed (acutely hazardous) pesticides are spilled and cleaned up with other substances: includes contaminated water and dirt. 100 kg of this waste makes the site an LQG.
- C0 EMPTY PESTICIDE CONTAINERS D,U LIST -Use only for empty characteristic or U-listed pesticide containers that have NOT been rinsed. Those that have been rinsed may be referenced in the narrative portion of your report. List in pounds
- C1 EMPTY PESTICIDE CONTAINER 2.5 GAL SIZE -Use only for empty C0 containers that have NOT been rinsed - 2.5 gallon size to list in units.
- C2 EMPTY PESTICIDE CONTAINER 5 GAL SIZE -Use only for empty C0 containers that have NOT been rinsed. - 5 gallon size to list in units.
- C3 EMPTY ACUTE PESTICIDE CONTAINERS P LIST -Use only for empty P-listed pesticide containers that have NOT been triple rinsed. 1 kg of this waste can make the site an LQG.
- D0 WASTEWATERS WITH TC ORGANICS - E.G. BENZENE -Use when wastewaters are contaminated with TC organic chemicals (i.e.: non-PCW (Petroleum Contact Wastewater) tank condensate, benzene, toluene, etc.).
- D1 CONDENSATE H2O FROM DRY CLEANERS -Use only for condensate water from dry cleaners. Treatment to eliminate the toxicity characteristic by DEP guidelines followed by evaporation or approved POTW discharge should be promoted.
- D2 PETROLEUM CONTACT WATERS- PCW -Use for PCW tank condensate wastewaters (if this material is managed according to 62-740 F.A.C. and the petroleum component is recovered and reused, it is not RCRA hazardous).
- E0 SLUDGES & SOLIDS WITH TC ORGANICS -ALSO SOILS -Use for Hazardous Waste solids, sludges, and soils contaminated with TC organic chemicals (i.e.: benzene, etc.). (See V0 for spill cleanup of commercial chemical products)
- F0 DUST AND SOLIDS WITH HEAVY METALS -Use for Hazardous Waste dust, solids, and soils contaminated with RCRA metals. (e.g.: sandblast grit). (See V0 for spill cleanup of commercial chemical products)
- F1 SOLIDS - SCRAP METALS, SOLDER, CIRCUIT BOARDS -Use for RCRA hazardous waste radiator solder, circuit boards, and other scrap metals. Solid metals being recycled for metal value may be exempt from listing or counting.
- F2 FILTERS WITH HEAVY METALS (NOT S1,K0,Y2,Y5) -

- G0 WASH, RINSE & OTHER WASTEWATER With HEAVY METALS -Use for wash, rinse & other wastewaters hazardous because they contain heavy metals in RCRA concentrations (characteristic[TC] or listed). (e.g.: for radiator shop cooling tanks)
- G1 SPENT ANTI-FREEZE W/ LOW LEAD (< 5 PPM) -Use for waste antifreeze that is non-hazardous. (< 5 PPM Lead, TCLP for other RCRA metals, or other organic constituents like benzene and PCE less than TC levels - determined by testing).
- G2 SPENT ANTI-FREEZE WITH LEAD/METALS (>= 5ppm) -Use for waste antifreeze that is hazardous.(> 5 PPM Lead, TCLP for other RCRA metals, or other organic constituents like benzene and PCE in excess of TC levels).
- H0 SLUDGES WITH HEAVY METALS -Use for Hazardous Waste sludges contaminated with TC RCRA metals (i.e.: sludge from waste antifreeze recycling systems, wastewater treatment sludges, oil/water separator sludge)
- I0 WASTE INK-FLASHPOINT<140 F AND HEAVY METALS -Use for Hazardous Waste inks that have a flashpoint < 140 degrees F and contain RCRA metals. . (characteristically ignitable D001, characteristically toxic, and/or listed)
- I1 WASTE INKS - FLASHPOINT < 140 F -Use for waste inks that have a flashpoint of < 140 degrees F only. (characteristically ignitable D001)
- I2 WASTE INKS - CONTAINS HEAVY METALS -Use for waste inks that contain RCRA metals only. . (characteristically toxic or listed).
- J0 IGNITABLE PAINT WASTES - FLASHPOINT < 140 F -Use for ignitable paint wastes only (flashpoint < 140 degrees F). (characteristically ignitable D001) May contain a combination of thinner and paint solids. Mostly paint
- J1 USED PAINT THINNER -Use for paint thinner only. Note: This code is for gun cleaner systems, etc. Mostly thinner. (usually characteristically ignitable D001)
- K0 OTHER PAINT WASTES W/HEAVY METALS -Use for non-ignitable paint waste contaminated with RCRA metals only. Tape, filters, dried paint/chips, etc. (characteristically toxic or listed)
- K1 PAINT STRIPPER- > 10 % METHYLENE CHLORIDE -Use for paint stripper that contains 10% or more halogenated solvent (Methylene Chloride, PCE, etc.). Note: Furniture stripping waste will most likely fall under this code.
- L0 SPENT SOLVENTS (MIX/OTHER) -Unknown Spent Solvents - Note: Do Not Use This Code if you can use one of L1-L9.
- L1 HALOGENATED SOLVENTS-CONTAINS CHLORINE OR Fluorine -Use for used halogenated solvents (mixed or not listed below - i.e.: contains chlorine, fluorine, or bromine in its chemical make-up). Note: Do Not Use This Code if you can use one of L3-L9.
- L2 NON-HALOGENATED SOLVENTS-E.G. MINERAL SPIRITS -Use for used non-halogenated solvents (mixed or not listed below - see Z2 for toluene or xylene). Also, if gasoline/diesel/kerosene are used as solvent.
- L3 MINERAL SPIRITS-PARTS CLEANER -Use for parts washers and mineral spirits. Note: If it is a Safety Kleen parts washer, use a conversion factor of 6.7 lbs./gallon. Otherwise list in gallons, drums, or barrels (7.0 lb./gal).
- L4 SPENT ACETONE -Use for used acetone solvent only.
- L5 SPENT METHYL ETHYL KETONE(MEK) -Use for used MEK solvent only.
- L6 1,1,1 TRICHLOROETHANE OR METHYLENE CHLORIDE -Use for used 1,1,1-Trichloroethane or Methylene Chloride solvent only.
- L7 SPENT TRICHLOROETHYLENE -Use for used Trichloroethylene solvent only.
- L8 SPENT FREON-113 -Use for used Freon-113 solvent only. Note: this is not as common as it used to be, so you may not see it very often.
- L9 SPENT IMMERSION CLEANER - HALOGENATED -Use for used immersion cleaners that contain halogenated solvents (i.e.: contain chlorine or fluorine in its chemical make-up) only.

- M0 SOLVENT DISTILLATION BOTTOMS -Unknown solvent distillation sludge - Do Not Use This Code if you can use one of M1-M3..
- M1 DIST. BOTTOMS-HALOGENATED -Use for halogenated distillation bottoms only (i.e.: contains chlorine or fluorine in its chemical make-up). Note: this code is NOT used for distillation bottoms from dry cleaners. (see M3)
- M2 DIST. BOTTOMS-NON-HALOGENATED -Use for non-halogenated distillation bottoms (i.e.: toluene, MEK, xylene, etc.) only.
- M3 PERCHLOROETHYLENE STILL BOTTOMS (DRY CLEAN) -Use for perchloroethylene distillation bottoms from dry cleaners only.
- M4 ABSORBENTS WITH HALOGENATED SOLVENTS -Use for absorbents and rags contaminated with halogenated solvents (i.e.: contain chlorine or fluorine in its chemical make-up).
- M5 ABSORBENTS WITH LISTED NONHALOGENATED SOLVENT -Use for absorbents and rags contaminated with non-halogenated solvents (i.e.: F005: toluene, xylene, benzene, etc.)
- M6 ABSORBENTS CONTAMINATED W/OIL -Use for absorbents contaminated with oil only. This material will not count toward generator status because it is considered petroleum contaminated material.
- M7 ABSORBENTS W/IGNITABLE ONLY SOLVENT -Use for saturated absorbents and rags contaminated with solvents that are TC hazardous for ignitability only. (F003, D001, mineral spirits, acetone, etc.).
- N0 DRY CLEANING FILTERS -Use for PCE dry cleaning filters only. Note: Units (13.6 lb./ea.) will be used unless a business states that their filters have a different weight
- N1 USED PERCHLOROETHYLENE -Use for spent perchloroethylene (PCE dry cleaning solvent) liquid only. (see D1 for dry cleaning Condensate waters)
- O0 REACTIVE WASTES - WITH CYANIDES OR SULFIDES -Use for reactive wastes such as those containing cyanides and/or aqueous sulfides. Note: Do NOT use this code for discarded, off-spec, or unused pure cyanides. (see X0 for explosives)
- O1 CYANIDE WASTES -Use for cyanide wastewater only. Note: Do NOT use this code for discarded, off-spec, or unused pure cyanides.
- O2 SULFIDE WASTES -Use for sulfide wastes only.
- P0 ACIDIC OR ALKALINE WASTES - PH<2 OR PH>12.5 -Use for hazardous (pH < 2 or > 12.5) caustic; acidic or alkaline wastes only. Note: Simple neutralization of this type of waste should be encouraged when safe and possible.
- Q0 SPENT PLATING WASTES-FROM METAL-PLATING, ETC. -Use for spent plating wastes and corrosives containing RCRA metals. Note: F-listed plating wastes will also be listed under this code.
- R0 DISCARDED GASOLINE, DIESEL OR OTHER FUELS -Use for fuels that are discarded (i.e.: gasoline, diesel, kerosene, etc.). Note: If a fuel is used for its cleaning properties, list it on the waste table using the "L2" code and that conversion factor.
- S0 PHOTOGRAPHIC WSTES-PRIM.FIXANT SOLUTION -Use for photo wastes that contain silver only. Note: Recycling this waste for the precious metal value should be encouraged.
- S1 PHOTOGRAPHIC SILVER RECOVERY CANNISTER -Photographic silver recovery canister/filter - either type. List in Pounds.
- S2 NON-HAZ EFFLUENT FROM PHOTO. SILVER RECOVERY -Use for non-hazardous photo wastes discharged to POTW that contain silver only. List in Pounds or Gallons Note: this waste is non hazardous and will not be counted as RCRA waste.
- T0 OTHER IGNITABLE WASTES - NOT I0,J0,L0 OR R0 -se for ignitable wastes that do NOT include waste codes I0, J0, L0,2,3, and R0 (D001 wastes include: . ignitable compressed gasses, oxidizers, solids ignitable from friction, moisture, etc)
- U0 WOOD-PRESERVING WASTES -Use for TC or characteristic wood preserving wastes. (e.g.: penta-chlorophenol, D037, Creosote, D023-D026, or characteristic for chromium or arsenic)

- V0 DISCARDED UNUSED OR OFF-SPEC COMMERCIAL CHEM -Use for discarded, unused, or off-spec Toxic or U-listed commercial chemical products, container residues, or spills from these products.
- V1 ACUTE DISCARDED UNUSED OR OFF-SPEC CHEM -Use for discarded, unused, or off-spec P-listed commercial chemical products or container residues from these products. 1 kg of this waste makes the site an LQG.
- V2 ACUTE CHEMICAL SPILL CLEANUP - P LIST -Use for spills from P-listed commercial chemical products. 100 kg of this waste makes the site an LQG.
- W0 LEAD-ACID BATTERIES -Use for vehicle lead-acid batteries only. List in units. Note: lead-acid batteries are exempt from RCRA if recycled.
- W1 MERCURY OXIDE BATTERIES -Use for non-rechargeable batteries only (i.e.: mercury oxide, silver oxide, and lithium batteries).
- W2 RECHARGEABLE BATTERIES: Pb-ACID OR NiCADs -Use for rechargeable batteries only (i.e.: nickel-cadmium or small sealed lead-acid batteries).
- W3 FLUORESCENT LAMPS -Use for Mercury Containing (Fluorescent, High Intensity Discharge (e.g.: mercury vapor, high pressure sodium, or metal halide) , some NEON) Lamps only . List in pounds.
- W4 MERCURY CONTAINING DEVICES (THERMOSTATS,ETC.) -Use for Mercury Containing Devices (Thermostats, Thermometers, some Relays, some Switches, some Scientific Equipment, etc.).
- X0 WASTE EXPLOSIVES -Use for waste explosives only (i.e.: fireworks NOT returned to manufacturers, some K-listed wastes, discarded military ordinance). Note: see O0 for any other characteristic reactive wastes
- Y0 USED OILS & OTHER LUBRICANTS -Use for used oil and other lubricants/fluids (not for segregated hydraulic oil (Y3) or cutting oils(Y1))
- Y1 METALWORKING (CUTTING) OILS -Use for metal working (cutting) oils (containing chlorinated paraffins and thereby exempted from halogen testing) only. List in gallons.
- Y2 CRUSHED OIL FILTERS -Use for crushed oil filters only. Note: oil filters should be drained for at least 24 hours before recycling them (as BMP / not regulated). List in drums/units.
- Y3 HYDRAULIC OIL -Use for hydraulic oil (considered by EPA and the State of Florida to be used oil) only.
- Y4 USED OIL CONTAMINATED W/ HALOGENATED HAZ WAST -Use for used oil contaminated with halogenated hazardous waste (contain chlorine or fluorine in its chemical make-up) only.
- Y5 UNCRUSHED OIL FILTERS -Use for uncrushed oil filters only. List in drums/units. Note: basically the same waste with the same issues as waste code "Y2" including the "Y0" recycling issues.
- Y6 NON-HAZ (HIGH FLASH/AQUEOUS) SOLVENT -Use for new non-hazardous waste solvents if you are sure they aren't hazardous. List in gallons/pounds. Note: this waste is non hazardous and will not be counted as RCRA waste.
- Z1 CARBURETOR CLEANER -Use for carburetor cleaner (used solvent) containing halogens only.
- Z2 BENZENE, TOLUENE, OR XYLENE - SPENT -Use for spent (used solvent mostly) benzene, toluene, or xylene only.

Activities

Activity Code	Activity Category	Activity Description	Enhanced Program?
CA	HW CONTAINER MANAGEMENT:	INADEQUATE AISLE SPACE 62-730.160	Y
CB		CONTAINERS LEAKING / BULGING 265.171	Y
CL		UNLABELED CONTAINERS 262.34(A)(3)	Y
CO		OPEN CONTAINERS 265.173	Y
CS		SAA ISSUES 262.34(C)(1)	Y
CT		TRAINING RECORDS 262.34	Y
FA		FACILITY HW RECORD KEEPING:	AUTHORITIES NOT NOTIFIED 265.37
FB	FAILURE TO MAINTAIN DISPOSAL RECORDS 62-730.030		Y
FC	FACILITY CONTINGENCY PLAN 262.34		Y
FD	UNDATED CONTAINERS 262.34(A)(2)		Y
FE	FAIL TO LABEL UW LAMP CONTAIN. 62-737.400(5)(B)(1)		Y
FI	INFORMATION NOT POSTED 262.34		Y
FM	MANIFESTS NOT CORRECT 262.40, 262.44		Y
FW	USED OIL/ FILTER REQUIREMENTS	NO WEEKLY INSPECTIONS 62-730.160	Y
OA		OIL CONTAINERS POOR COND. 62-710.401(6)	Y
OB		OIL CONTAINERS NOT STORED PROPERLY 62-710.401(6)	Y
OC		FAILURE TO LABEL USED OIL CONTAINERS 279.22	Y
OD		FAILURE TO DOCUMENT USED OIL DISPOSAL 279.	Y
OE		OILCONTAINER W/ NO 2ND CONTAINMENT 62-710.401(6)	Y
OF		OIL FILTER CONTAINER NOT CLOSED 62-710.850(5)(A)	Y
OI		IMPROPER DISPOSAL USED OIL FILTERS 62.710.850(1)	Y
OL		FAILURE TO LABEL OIL FILTER DRUMS 62-710.850(5)	Y
OO		Other (specify in comments)	Y
OR	GENERAL HAZARDOUS WASTE (HW) REQUIREMENTS	FAILURE TO RESPOND TO OIL RELEASE 62-710.401(3)(A)	Y
RA		ACCUMULATE > 1000KG HW 261.5(G)(2)	Y
RD		FAILURE TO PROVIDE HW DETERMINATION 262.11	Y
RF		FAILURE - ENSURE DELIV. OF HW TO TSD 261.5	Y
RH		IMPROPER DISP OF HG CONTAINING DEVICE 62-737.300(1)	Y
RM		FAILURE TO USE MANIFEST OR RECLAMATION AGREEMENT	Y
RN		FAILURE TO NOTIFY AS GENERATOR 262.12	Y
RP	FAILURE TO PROVIDE PERSONAL TRAINING 265.1	Y	
RR	STORAGE TANK SECONDARY CONTAINMENT / OTHER	EVIDENCE OF RELEASE(S) OF 265.31	Y
RT		FACILITY EXCEEDS 90/180-DAY LIMIT 262.34	Y

Activities

Activity Code	Activity Category	Activity Description	Enhanced Program?
SC		INCOMPLETE CONTAINMENT STRUCTURE 62-761.700(3)(E)	Y
SD		SECON. CONTAIN. DRY CLEAN SOLV 376.3078(9)(A)(B)	Y
SP		Discharge of a pollutant, 403.161, F.S.	Y
ST		Exceeds Tire Storage, 62-711.300	Y
SV		DRAIN VALVES OPEN 62-761.700(3)(A)(3)	Y