

## Can satellite locations consolidate CESQG waste at a non-permitted facility before disposal? \*

School districts, utilities, military bases, auto shops, or other chain businesses frequently consolidate CESQG at a single location before arranging for proper disposal. This guidance document is to clarify that if the CESQG wishes to manage their waste under solid waste handling standards (rather than the Dangerous Waste regulations) the consolidation location they are shipping to must have a permit to manage moderate risk waste from the jurisdictional health department.

The Dangerous Waste Regulations **WAC 173-303-070(8)(b)(iii)(C)** state:

(b) Small quantity generators will not be subject to the requirements of this chapter if they

(iii) Either treat or dispose of their dangerous waste in an on-site facility, or ensure delivery to an off-site facility, either of which, if located in the United States, is:

(C) Permitted to manage moderate-risk waste under chapter 173-350 WAC (Solid Waste Handling Standards), operated in accordance with state and local regulations, and consistent with the applicable local hazardous waste plan that has been approved by the department.

If managers of consolidation locations believe that specific design or operating standards of the moderate risk waste section (WAC 173-350-360) are unnecessary based on their handling of the waste, they can request a variance from the Solid Waste Handling Standards per **WAC 173-350-710 (7) Variances**. The variance must be approved by the local health department and the Department of Ecology.

\* Note: The answers provided to Frequently Asked Questions are guidance for implementing WAC 173-350-360. Following this guidance is not a requirement of operation or design for MRW facilities, as facilities may meet regulatory requirements through other means. Local Health Departments should be consulted to determine what will be sufficient to meet the regulatory standards.