

Is a site that consolidates dangerous waste from company-owned, off-site conditionally exempt small quantity generator (CESQG) locations required to have a moderate risk waste (MRW) permit? *

School districts, utilities, military bases, auto shops, or other businesses sometimes consolidate dangerous waste from company-owned¹, off-site CESQGs at a single location before arranging for proper disposal. [Chapter 173-303 WAC, Dangerous Waste Regulations](#) (section WAC 173-303-070(b)), allows CESQGs to deliver their dangerous wastes to one of eight facility types. Two of these types include *permitted* MRW facilities or facilities with a dangerous waste treatment, storage, and disposal (TSD) *permit*.

Exceptions to the MRW and TSD permit requirement allow consolidation sites to receive and store company-owned, off-site CESQG waste for 10 days or less without a permit. These consolidation sites will need permits when:

- They store CESQG waste for more than 10 days prior to delivery to a facility permitted to receive it; or
- They treat, recycle, bulk, or otherwise manage CESQG waste (besides passive, temporary storage); or
- They manage CESQG waste in a way that poses a potential threat to human health or the environment.

Please contact the Department of Ecology's Hazardous Waste and Toxics Reduction Program for questions pertaining to the requirements of the [Dangerous Waste Regulations, chapter 173-303 WAC](#).

For MRW facilities, [chapter 173-350 WAC, Solid Waste Handling Standards](#) provides standards for design, operation and permitting, but allows flexibility with design and operating standards. If managers of consolidation sites believe certain standards of WAC 173-350 are unnecessary, they can request a variance from those standards. Jurisdictional health departments and Ecology must approve variance requests.

¹ "Company-owned" includes multiple locations or generators under the same ownership (such as a company) or the same administration (such as schools, utilities or military bases).

* 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.