



February 6, 2003

Dear Participant;

Thank you for your interest in the Northwest Automotive Trade Association's Mercury Switch Replacement project. This letter is intended to clarify state and federal hazardous waste rules and to provide best practice recommendations on the management and accumulation of mercury switches generated from providing this service to your customers.

Once removed from the vehicle, the mercury switches would be considered hazardous waste and must be managed accordingly. Management, storage and disposal options will depend on your facility generator status. The mercury containing switches must be counted in the total volume of hazardous waste generated at the facility and in some circumstances, could affect your generator status. A brief summary of Idaho Hazardous Waste Generator Requirements appears below.<sup>1</sup>

### **Conditionally Exempt Small Quantity Generators**

Conditionally Exempt Small Quantity Generators (CESQGs) are defined as those shops generating less than 220 pounds of hazardous waste per month and less than 2.2 pounds of acutely hazardous waste. The regulatory requirements for CESQGs include conducting adequate waste determinations and ensuring delivery of hazardous wastes to an appropriate disposal or recycling facility.

Although not required by rule, DEQ recommends that CESQG participants in the Mercury Switch Replacement Project accumulate waste switches in closed, sealed containers marked as "Hazardous Waste-Waste Mercury Switches." Northwest Automotive Trade Association has agreed to provide a customized accumulation container, along with a supply of film canisters to hold breakable glass switches that may be removed from some vehicles. Because there are no DEQ or EPA requirements for transportation of hazardous wastes by CESQGs, shops in this regulatory category can self haul their switches to a designated collection site, or utilize available pick-up services, without using a hazardous waste manifest. DEQ suggests checking with the Idaho Department of Transportation for additional requirements that may apply. DEQ also recommends that the mercury switches be transported in the sealed/labeled containers to limit risks (and liabilities) of any releases of mercury to the environment resulting from an accident.

### **Small Quantity Generators**

Facilities that generate between 220 pounds and 2,200 pounds of hazardous waste per month and less than 2.2 pounds of acutely hazardous waste are classified as small quantity generators (SQGs) and are subject to more requirements for the storage, transportation and disposal of

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<sup>1</sup> Please note: DEQ provides this document solely to assist facilities in understanding the basics of implementing the Idaho Rules for Rules and Standards for Hazardous Waste IDAPA 58.01.05. This document does not substitute for those Rules. Any question should be resolved by reference to the published Rules available at [www2.state.id.us/adm/adminrules/rules/idapa58/58index.htm](http://www2.state.id.us/adm/adminrules/rules/idapa58/58index.htm) or by contacting DEQ.

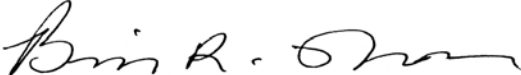
hazardous waste. Requirements include accumulating wastes (e.g., mercury switches) in closed containers marked with the words “hazardous waste” and the date upon which waste began accumulating in the container. EPA and DEQ requirements also govern the length of time waste may be stored on-site and state that small quantity generators must obtain an EPA ID number, use a registered hazardous waste transporter and a waste manifest to transport waste off-site. Additionally, these wastes must be delivered to a permitted treatment, storage or disposal facility.

**Large Quantity Generators (LQG)**

This status applies to facilities that produce more than 2,200 pounds of hazardous waste per calendar month or more than 2.2 pounds of acutely hazardous waste. Large quantity generators are subject to even more requirements. For information on LQG requirements please visit our Web site at [www.deq.state.id.us](http://www.deq.state.id.us).

For more information on determining your generator status, disposal options for hazardous waste or the rules regarding hazardous waste, contact the appropriate DEQ regional office or visit our Web site.

Sincerely,



Brian Monson  
Hazardous Waste Program Manager

**DEQ Regional Offices**

Boise Regional Office	(208) 373-0550
Coeur d’Alene Regional Office	(208) 769-1422
Idaho Falls Regional Office	(208) 528-2650
Lewiston Regional Office	(208) 799-4370
Pocatello Regional Office	(208) 236-6160
Twin Falls Regional Office	(208) 736-2190