



P2 Quarterly

The Newsletter of Lee
County's Pollution
Prevention Program

Summer 2006

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[www.lee-county.com/naturalresources/
pollution/default.htm](http://www.lee-county.com/naturalresources/pollution/default.htm)

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Do you need a speaker for an upcoming event? Would you like a specialized presentation for your next trade association meeting? Give us a call to schedule a time for your next educational needs. Lee County's Pollution Prevention Program has performed presentations in several parts of the country as well as Canada and Mexico. We are here to serve our business community. Just call (239) 479-8126.

What's This About the Hazardous Waste Surcharge?

The Lee County Occupational renewal season is now over and some of you have been calling with questions about the \$20.00 surcharge being added to your occupational license (OL). Previously some occupations have been exempted from the fee and received that exemption from the Pollution Prevention Program. As of January 1, 2006 all businesses that held a hazardous waste exemption had the exemptions voided. This is an agreement between the Lee County Tax Collector Office and the Board of County Commissioners. Its' designed to help stream line the OL process and to address some of the environmental regulatory rule changes that affected previously exempted businesses and/or facilities. All businesses that are purchasing a new Lee County OL or renewing an existing OL will now pay the hazardous waste surcharge. There is no longer an exemption process for the \$20.00 fee.

What is the Pollution Prevention Program?

The Pollution Prevention Program (P2) is an education program designed to assist Lee County businesses with the regulatory management requirements and/or with assistance in the reduction of their hazardous wastes and associated regulatory liability. The goal of the program is to assist businesses with reducing, reusing, and recycling their hazardous waste economically, utilizing proven pollution prevention technology. The P2 Program strives to accomplish this through many avenues. The Program conducts onsite regulatory assessments, distributes the P2 Quarterly Newsletter and provides updated industry specific Best Management Practices (BMP) fact sheets. We stay informed of the latest pollution prevention technologies through the National Pollution Prevention Roundtable (NPPR) and the North American Hazardous Management Association (NAHMMA). We attend regulatory conferences hosted by the Department of Environmental Protection (DEP). The P2 program performs informational presentations at meetings of a variety of industrial and trade organizations. We have informational booths for educational outreach at the Southwest Florida Lee County Fair and the Southwest Florida Utility Contractors Association annual show.

What is my \$20.00 going to be used for?

The fee covers the cost of the mandated Florida State Statute that requires Counties throughout the State of Florida to perform assessments at all businesses. Lee County has been performing these assessments since 1989. Our history with the mandate requiring the assessments has shown a lot of businesses were not in compliance with the minimum regulations. We decided the best way to help the non-compliant businesses is to provide specific regulatory education assistance based on the type of facility operations while performing the mandated assessment. We provide educational handouts that cover all types of operational situations from vehicle maintenance, facility maintenance, hazardous waste management, employee training and the types of equipment and or services needed to be complaint and help protect the environment. We want to prevent pollution and lessen the regulatory requirements and liabilities which saves the businesses time and money. Our motto is to be proactive instead of reactive!

First do no harm... the proper way to handle radiographic waste.

X-rays are a wonderful, useful, and important diagnostic tool. Many doctors, dentist, veterinarians and hospitals couldn't do their jobs without them. Unfortunately there is also a regulatory requirement to them. The chemicals necessary to develop the pictures can be harmful to people and the environment if not disposed of in the proper manner.

This article will address the options available to the medical industry for disposal of these chemicals. These options will keep you and the environment safe as well as keep you in compliance with the regulatory agencies.

Silver is the element used most in radiographic materials. Silver thiosulfate is present in the fixer solution and the rinse water after film processing. These two liquids are considered hazardous waste under RCRA [Resource Conservation and Recovery Act] and have specific disposal regulations. No spent fixer can be disposed of down the drain, and rinse water, which contains small amounts of silver, can only be discharged into the sanitary sewer system with written permission from your sanitary sewer company.

The options available to stay in compliance vary, and depending on what works best and is most cost effective for your business will determine which you chose. Obviously the best way to go is to eliminate the silver all together. This could be done by using digital x-ray techniques. However most of you may be satisfied with your current processing techniques and are not in the market for a change.

So where to go from here? The first step is to get acquainted with your equipment and verify maintenance requirements for the processor and what kind of silver recovery system do you have, if any? Where are all those tubes going to, and what are they carrying? Once you find out the answers to these questions you can decide what the best method of compliance is for you.

The most important thing to discover is where your spent fixer is going. There are several different processing systems available. Let's discuss the hand tanks used by many dental offices first. The chemicals are removed manually and stored in a container for disposal. A similar situation is when the processor has tubes that drain directly into an external container again for proper disposal, usually by the supplier of your chemicals. This is allowed as long as the amount of all regulated waste chemicals generated from the facility is in volumes that classify the facility as a Conditionally Exempt Small Quantity Generator (CESQG). It is the responsibility of the generating facility at this point to obtain a receipt specifying how many gallons were taken. This receipt must be kept on file for 3 years. The company who services your processor should be able to determine when your silver recovery device needs to be replaced or cleaned. They should also give you a receipt for the used canister, or for the amount of sludge/debris they removed for your records, again these need to be kept for 3 years.

For facility's that have processing units that utilize silver recovery devices, and then discharges the treated effluent to a sanitary sewer system, need to get a permission letter from your utility company. The letter should state that their wastewater treatment plant can handle the amount of silver being discharged from your facility. Once the silver threshold amount is established and the waste stream meets the pretreatment requirements of the sewer facility, then discharge can occur. The threshold amount will vary from utility to utility so get in touch with them, particularly with the Pretreatment Officer (PO). The PO will help determine if the silver recovery device utilized meets their standards based on the manufacturer's specifications.

So let's recap, first NO fixer or rinse water should be discharged to the sewer without permission from your local utility company. In the case of discharge to a septic system, the Health Department must provide the permission letter. Second if your processor empties into an exterior container it needs to be picked up by a company that will recover and recycle the silver extracted. Third if you discharge to the sanitary sewer system, a silver recovery device of some kind needs to be in place on your processing unit that meets discharge criteria as set by the PO. Fourth, and the most important step, is to keep good records! Receipts for all waste taken and the letter from the utility company will cover you in case an enforcement agency or anyone else knocks on your door. If you need further assistance or information please visit our website at www.lee-county.com/pollution and feel free to e-mail one of our staff or contact us at 239-652-6126.

Mercury Containing Lamps Destined for Recycling

Many of you have heard that mercury effects our environment, but do you ever consider how it gets into the environment? One of the major local contributors of mercury releasing to the environment is from the improper disposal of our lighting. Mercury is found in High Pressure/Low Pressure Lighting. Fluorescent Tubes, Compact Fluorescent bulbs, High Intensity Discharge lamps, Metal Halide, Mercury Vapor Lamps, High Pressure Sodium lamps and Neon lamps containing mercury (Examples of these lamps can be seen on our web site <http://www.lee-county.com/pollution>). Utilized at businesses and/or home, these lamps can save consumers money, mainly from the characteristics of having a long life and low power usage. Waste lamps handled improperly can cost consumers money and have detrimental effects on the environment. Commonly these lamps are improperly disposed of with normal trash. When thrown away they typically end up breaking and discharging the mercury to the air. They get compacted by the garbage trucks and break and end up vaporizing the mercury to the atmosphere where moisture combines with the vaporized mercury and literally rains mercury contaminated water onto the land. A similar effect happens if the bulbs in the trash are land filled. The decomposition of organic material produces heat and land fills can reach temperatures up to 194°F. This increased temperature can volatilize the mercury in the land fill resulting in similar effects as incinerating. Once the evaporated mercury rain's back to our land and into the water, it ends up being absorbed by living organisms within the food chain. These mercury contaminated organisms are consumed by larger organisms where it bio-accumulates. The mercury moves up the food chain until it ultimately ends up in us. A recent study done on all types of fresh and salt water fish in our local waters, shows that the mercury content is so high that, on average, it is only safe to eat about 6oz of local fish per week. Some species are so contaminated that they are not recommended being eaten at all.

So how do we prevent future mercury contamination? One step that everyone can do is dispose of there mercury containing lamps and devices properly. Under the universal waste rule (Resource Conservation and Recovery Act (RCRA) Part 273) mercury containing devices can be recycled and not counted as hazardous waste. There are many companies that recycle these and several can be found on our website (http://www.lee-county.com/naturalresources/pollution/Pollution_uploads/HAULERS_LIST_.pdf). While storing the mercury containing lamps destined for recycling, RCRA requires the container they are in be properly labeled as follows:

(This can be cut out and taped to your box).

**MERCURY CONTAINING
LAMPS/DEVICES
DESTINED
FOR RECYCLING**

P2 Program Has Moved!!

The P2 Program has relocated to offices located at 190 Evergreen Road in North Fort Myers. The move was needed to better serve the business and P2 customers and make the operations more efficient. From this location we will be able to supply storage containers, labels, and all our handouts to the regulated community. With the added ability to be in the field more, performing assessments and less time consumed by the logistics of parking in downtown Fort Myers, this alone will save us valuable time and afford us more flexibility in dealing with the specific needs of the business community.

If you need any assistance with your regulatory requirements, please do not hesitate to contact our office to set an appointment for an onsite assessment to be performed by our qualified staff. If you would like to contact us to inquire about your regulatory requirements and remain

anonymous, we can help work with you as well. A goal of the Program is to work with all businesses in the best and most comfortable format they desire. Below is a list of the phone numbers and current staff:

Dale L. Nottingham: 239-652-6126

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Edgar Girard: 239-652-6129

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If you notice any activities that do not look appropriate and could be a potential violation such as illegal dumping and/or discharge to any storm water system, please contact our office and provide the location so that we may respond.-

**The CESQG Business
Collection Day Schedule
Sponsored by :
Lee County's
Department of Solid Waste
(Disposal Fee Involved)**

January 25, 2007

April 12, 2007

July 19, 2007

October 4, 2007

Collection times for the CESQG scheduled events are from 8:00 a.m. to 3:00 p.m. Location of the CESQG collection day is North Airport Road at Page Field. Scheduled collection days and times are subject to change and/or cancellations, depending on inclement weather. *There is a fee involved for disposal.* If you have any questions regarding the associated fees, please contact Jan Daniels of EQ Florida, Inc. at 1-800-624-5302 ext.231

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