

# SQG



## quarterly

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## **Shrinking to do more**

With the budget season upon us in the Small Quantity Generator Program, tough choices have been made. While the planning of the future is becoming more crucial to the needs of Lee County's business community, we have reorganized our approach to save resources. Strategy and goals of the past have been changed to reflect our future needs. Staff and program vehicles have been reduced, computer software enhanced, procedures in the office streamlined, and diversity of assessments refocused. How are we going to perform the tasks we did in the past? The tools we will utilize, Pollution Prevention (P2) and Best Management Practices (BMP's), will be extended to cover more situations in better detail. Research will be performed and presentations will be made to accomplish needs of trade associations. Field assessors will be trained to assist the National Pollution Discharge Elimination System (NPDES) permit requirements and to log an inventory of potential sites for this Federal requirement. The entire SQG Program team will contribute to the production of the SQG Newsletter and cover more topics. The Activity Certification Affidavits (ACA's) system that eliminates businesses from the surcharge fee has been improved. Management has asked us to do more, faster and better, with less. With more comprehensive training, improved equipment, and procedures, the dedicated staff of the SQG Program is confident we can deliver.

We purchased lap top computers to assist us in the field to meet the State mandate that created the SQG Program. The problem we were having utilizing the laptops was with the software that was provided by the State. So, we hired our own consultant and developed the Generator Assessment Software Program (GASP). With this new program we will be able to provide vital information to fire districts, garbage districts, and utility districts. This information will help them to protect the environment and keep dangerous trends in check. A portion of GASP will help the county meet the NPDES requirements. Other county programs around the State have asked us to provide them with GASP in an effort to improve their needs. So we did! We are on the ground floor of organizing the State Pollution Prevention Roundtable. We plan on marrying the two programs of P2 and SQG together to have consistent distribution of information and networking throughout the State. With this marriage of programs there will be less cost and better benefits for the

businesses throughout the State. Florida will set the standards that others in the nation will follow. The future looks brighter for compliance to become the norm, and enforcement to be the last resort.

Where does enforcement fit in this new age of education for compliance? It should always be the last resort of regulatory agencies! The past accomplishments of State and Federal Agencies have been measured by the amount of convictions and/or the dollars collected from violators. This is the evil side of regulations, but one that is still needed for those who refuse to comply. If a business has limited funds to operate it is in their best interest, as well as ours that they follow the right path. If they choose the wrong path when dealing with hazardous waste, the consequences of their actions will adversely affect our future generations. This is a dilemma that faces educational programs throughout the State of Florida. What do we do when a business that has been educated, chooses the wrong path? With shrinking resources and limited time to spend with a business, the choice will not be easy. The actions of the business community and their needs will direct the choices of the future.

## **Local Athlete Needs Sponsors**

Melvin Henderson, local resident and U.S. Veteran will attend the 1998 Veterans Wheelchair Games in Pittsburgh, Pennsylvania from July 7-11, 1998. Mr. Henderson has won 5 gold medals, one silver medal and two bronze medals at

previous competitions. He is competitive in Javelin, Shot Put, Table Tennis, Distance Throw and Air Rifle. He is currently looking for sponsorship from local businesses and/or any other interested organizations. He would be

happy to carry a company's name or logo with him to the games in Pittsburgh. If you or your business is interested in sponsoring Mr Henderson, please write or call him at: 2835 Central Avenue, Ft. Myers, FL 33901; Phone 334-0980.

## Q & A: PAINT WASTE, FLOOR STRIPPING AND MORE...

**Q: I only generate about a quart of paint waste every month through my auto body shop, and I let it evaporate onsite, am I exempted from the regulations?**

**A:** No! Businesses that generate ANY quantity of hazardous waste are regulated by the Resource Conservation and Recovery Act. A business that generates less than 220 lbs per calendar month, never exceeds 2,200lbs in storage at any time, and never generates more than 2.2 pounds of an acute waste, are known as Conditionally Exempt Small Quantity Generators (CESQG's). Some exemptions in the regulations covering this type of generators are; they are not required to possess an EPA/FLDEP I.D.#. They can transport their own waste to a licensed/permitted Treatment Storage and Disposal Facility (TSD) or to a collection day sponsored by a local government. Also, CESQG's are not required to have a written Contingency Plan in case of an emergency. Documentation of disposal must be kept ON SITE for a three year minimum, and all storage containers are subject to 40CFR part 264 subparts I (Use and Management of Containers), and J (Tank Systems).

Evaporation is never an appropriate disposal method. Because a CESQG has a quart of waste a month does not mean that they can allow the paint waste to evaporate. Hazardous waste should always be kept in a closed container that is compatible with that waste. Possible fines can be levied for allowing waste to evaporate. Other RCRA violations can include; no disposal records, open containers, unmarked containers, and possibly on-site treatment of hazardous waste without a permit. Also, Clean Air Act violations

could also be attached. These violations would be enough to put most CESQG's out of business. Education on Best Management Practices utilizing Pollution Prevention would eliminate these concerns!

**Q: In my flooring business we use Methylene Chloride to strip off sealer from tile floors. Is this a hazardous waste, and if so, how do I handle it properly?**

**A:** Yes. Methylene Chloride is a hazardous waste listed in 40CFR 261.31 as a F002 coded waste. Employee safety is very important because of the toxic nature of the chemical. Respirators are recommended, as well as protective clothing for areas of the body that have the potential to come in contact with the chemical. Consult NIOSH (National Institute for Occupational Safety and Health) pocket guide to chemical hazards. This pocket guide can be obtained from National Institute for Occupational Safety and Health (for problems call 1-800-35-NIOSH) or write to; NIOSH, 4676 Columbia Parkway, Cincinnati, Ohio 45226.

One way to collect this hazardous waste generated from stripping floors is with a wet vacuum. You can then transfer the waste to a container for transporting it back to your facility. Storage in a properly labeled container is required. If you are an SQG you have 180 days to have the hazardous waste hauled off by a licensed hazardous waste hauler.

**Q: How can I estimate what I generate every month when it is in a liquid form?**

**A:** This can be a problem since most liquids are diverse in their measurable weight. A general rule of thumb is generation of less than half of a 55gallon drum (25 gallons) per calendar month should keep you in the CESQG category. However, some liquids with heavy

metals can weigh as much as 10.5lbs a gallon, which would put you into the SQG category. If you would like a listing of liquids and their poundage equivalents, please call the (941) 479-8126.

**Q: I own a printing company and we discard our used rags to the dumpster. Are we doing anything wrong?**

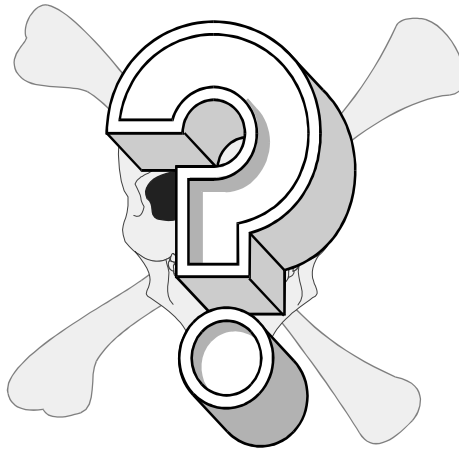
**A:** Yes, if you use the rags in conjunction with a solvent to remove ink from the blanket on the offset printing machine, you are probably disposing of a hazardous waste improperly. We recommend contracting with a rag service to recycle the rags off site. Although cotton shop rags cannot always be used in all phases of printing they can be used to limit the number of paper towels you have to use, which will reduce the amount of hazardous waste you manage. For instance, if you use your shop rags with blanket wash first and then go over the blanket with a paper towel to get rid of any lint you will end up with far less paper towels than if you only used paper towels. This option may be more expensive, but it will reduce your liability and simplify your storage requirements. If you choose to use your own rags you must store them according to 40CFR part 264, subpart I and determine if they are hazardous and dispose of them accordingly. If you want to wash them on-site and/or off-site, and the chosen place to wash them is on a Publicly Owned Treatment Works POTW (sewer), you will need permission from the pretreatment officer before discharging the wastewater to their system. If the facility is on a septic system the self-washing option is not allowed.

# Do you generate or don't you? That is the question...

Most business people that approach the Hazardous Waste counter in the Public Works/Community Development Center meet the SQG Program staff with the phrase; "my business doesn't generate any hazardous waste." While most of the people honestly believe this to be true, our response is usually; "you would be surprised to know what is considered hazardous waste." In fact, almost ALL businesses have the potential to generate hazardous waste. You may wonder how this is possible.

One item that nearly all businesses generate is fluorescent lights. Fluorescent lights are hazardous waste because they contain mercury. When mercury is released into the environment, it is absorbed by animals and plants, which are subsequently ingested by people. A person may or may not be sensitive to very small amounts of mercury, but when it reaches certain levels it is toxic to everyone. The amount of mercury can multiply 100 times by the time it reaches the top of the food chain. Mercury toxicity is linked to many medical problems, which can include severe central nervous system problems. So, it is in everyone's best interests to recycle these devices. There are some fluorescent lights that are advertised as "EPA Approved". Although these lights may not contain the levels regulated by the EPA, in Florida the law says any mercury-containing device is regulated.

How are fluorescent lights recycled? ported to a permitted recycling facility metal ends are recycled through a metal tracted by a distillation process and re-containing devices. The glass is re-can be used in anything that does not ucts.



They should be collected and trans-where they are disassembled. The facility and reused. The mercury is ex-used in manufacturing new mercury cycled for use in manufacturing and come into contact with edible prod-

Another waste that some businesses waste is acetone. Most people believe though evaporation in their business Acetone is a hazardous waste in two ous (due to flash point) and it is also a listed hazardous waste (solvent), therefore, the rag or cotton ball with which the acetone has come in contact becomes hazardous. According to the regulations, the rag or cotton ball should be stored in a closed container and treated as a hazardous waste. Additionally, it is illegal under RCRA to allow the used acetone to evaporate as a method of disposal. According to the regulations, this is considered on-site disposal which is forbidden.

use, but don't think of as hazardous that the acetone is completely used process and is, therefore, not a waste. ways, it is characteristically hazard-

For nail technicians, this issue is especially tricky. We have had many nail technicians say that they have switched to non-acetone nail polish remover to avoid this regulation. Unfortunately, even if a product is non-acetone, it may still be hazardous. This will depend on the constituents of the product. The status of a product can easily be determined by acquiring a Material Safety Data Sheet (MSDS) from the distributor of the product. The MSDS will show what the product is made up of, the percentages of those components and information such as flash point, health hazards, storage and disposal requirements, etc.

As can be seen, items that are used every day can be considered hazardous waste once they are used. You may want to look a little more closely at the products you use in the course of your business before you say, "my business doesn't generate hazardous waste."

The SQG Program can assist you with interpreting MSDS's, evaluating your waste streams and/or assessing your operations for Best Management Practices. We can also supply you with a local hauler's list and alternatives for disposal. If you need further information, please call (941) 479-8126.

# NPDES...What you should know

NPDES (National Pollution Discharge Elimination System) is a federal program associated with the federal Clean Water Act. It is designed to improve water quality in our rivers, lakes, estuaries and oceans. The Lee County NPDES permit is for stormwater. We are charged with making sure only stormwater is discharged into our stormwater drainage system.

Industries and businesses may have to obtain either individual or group permits for their stormwater runoff. If your business has out door activities such as material storage, scrap metal storage, maintenance, repairs, fabricating, manufacturing or dusty conditions, you may need to have a NPDES permit. All construction activities over 5 acres (considered industrial activity) must file a NOI for NPDES. Lee County is verifying business activities as part of our NPDES permit re-

quirements. There are on-site inspections to determine whether or not there is a stormwater discharge off-site into the MS4 (the storm sewer system) or federal waters and the type of activities exposed to stormwater. This information will be included in our Annual Report to the EPA. At that time, the EPA will make

a determination as to the necessity of a NPDES permit.

In general, there are two methods to reduce or eliminate the necessity for a NPDES permit. 1) Have no stormwater contact with materials (covered storage) and/or 2) Have no stormwater discharged from the site. This would be no rainwater contact with materials and/or 100% retention with no point source or emergency outfalls. These combine well with Pollution Prevention (P2) methods to recycle, reduce and reuse.

Lee County is beginning to assemble some informational materials to begin a BMP (Best Management Practices) Library. If you have BMPs for your industry, let us know. Industrial BMPs are specific to each industry, thus we need your help to have the best information available.

If you have questions related to this subject, call Tony Pellicer or Robert Tewis at 479-8181.

**The CESQG Collection Day Schedule**  
 Sponsored by the Department of Solid Waste  
 (Disposal Fee Involved)

July 9, 1998  
 October 10, 1998

Collection times for the scheduled days are 8:00 a.m. to 3:00 p.m. Location of the CESQG collection days is on North Airport Road at Page Field. Schedule collection days and times are subject to change and/or cancel, depending on inclement weather. **There is a fee involved for disposal.** If you have any questions regarding the associated fees, please contact City Environmental Services of Florida, Inc. directly at 1-800-624-5302.

Chris Bishop at ext. 237  
 Sue Salerno at ext. 228  
 Heather Seals at ext. 229

Bulk Rate  
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 Permit No. 756

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