

P² Quarterly

The Newsletter of Lee
County's Pollution
Prevention Program

Spring 1999

Program Staff

L.A.(Tony) Pellicer DNRM Manager
Dale L. Nottingham Program Supervisor
James Ward ES I
Renee Kwiat ES I

Published By:

P² Program
1500 Monroe Street
P.O. Box 398
Fort Myers, FL 33902
Phone: 941/479-8126

NEWSFLASH!!

The SQG Quarterly Has a New Face!

The Lee County Small Quantity Generator (SQG) Program is shifting gears to broaden its' scope of services. As mandated in Sections 403.7234 and 403.7225, Florida Statutes, each county is required to notify at least 20% of all potential hazardous waste generators and verify their hazardous waste management practices annually. The Statutes require the county to become a bean counter of sorts and funnel all data to Tallahassee by June 30 of every year. The information provided to the State of Florida's Department of Environmental Protection (DEP) is to be used for reports to the legislation. The Statute mandates data collection for the types, amounts, and management standards of all hazardous waste generated at the facility. Most facilities do not know the questions asked during an assessment shadow responsibilities found in the Resource Conservation and Recovery Act (RCRA) as they pertain to facility operations.



The assessments performed in the past by the SQG Program were designed to collect data as required in Florida Statute, Chapter 403. Also, the Program staff would look over the storage and record keeping requirements for managing the hazardous waste generated by the facility. Summarized information on RCRA compliance requirements were provided to address any deficiencies that the facility may have. This type of assessment has limited ability to assist a business with their total compliance questions and reduced the opportunity to provide insight on available technology such as Pollution Prevention, which will assist in further meeting compliance requirements.

The new direction the SQG Program will take for assisting a business with compliance requirements will be towards Pollution Prevention education. Our experience performing assessments coupled with the requirements for the National Pollution Discharge Elimination System (NPDES) permit requirements, an amendment to the Clean Water Act (CWA), will require zero discharge from facilities that have hazardous materials/waste. The NPDES permit will require a facility to properly store, handle, and control any potential for discharge from the storage and/or use of hazardous materials/waste. The requirements are designed to require a facility to control their operations and eliminate contaminated storm water from entering the waters of the United States. This includes all out-falls of contaminated storm water on the facility's property with a potential to drain to ditches, canals, creeks, etc. that may eventually enter waters of the United States.

Utilizing Pollution Prevention as the main tool for educational assistance, we can save the facility money on; storage, disposal, employee training, new product purchases, cleanup of spills, and the compliance cost of reporting requirements. Bottom line savings for operations for the facility could be realized within the first four to six months from the time of implementing P² technologies. There are already case studies from around the United States which prove that there are new ways to perform the same tasks which yield the same quality results, but reduce or eliminate the generation of hazardous waste. One case study being printed now is about Lee County's Fleet Maintenance Facility. The facility was fined over four years ago for the improper management of hazardous waste. Although there were no environmental impacts, the fines were significant enough for the Board of County Commissioners to direct management to make sure

Do you need a NPDES Permit?

The following are types of businesses that may be required to obtain an Industrial Multi-Sector NPDES General Permit (these are examples, please contact the USEPA as listed in the feature to the right for a determination):

- **Timber Product Facilities**
- **Asphalt Paving and Roofing Materials**
- **Glass, Clay, Cement, Concrete and Gypsum Product Manufacturers**
- **Landfill & Land Application Sites**
- **Scrap & Waste Recycling Facilities**
- **Automobile Salvage Yards**
- **Ship & Boat Building or Repair Yards**
- **Treatment Works**
- **Vehicle Maintenance Facilities**
- **Printing and Publishing Facilities**

Industrial Wastewater Permit Information

Since November, 1990, the USEPA has required stormwater (NPDES) permits for some industrial facilities. As of October 1, 1995, some industries were to apply for the Multi-Sector General Permit. By August 1, 2001, all commercial, retail, light industrial and institutional facilities, which have the potential to pollute United States waters either directly or via storm sewers, must apply for an NPDES Multi Sector Permit. The following information provides some basic requirement and exemption information.

General Permit Requirements

Most permits issued under the stormwater program require development and use of a stormwater pollution prevention plan. Such plans describe how the facility will prevent stormwater from becoming polluted by making sure that:

- Potential pollutants are not left outside uncovered.
- Spills are prevented.
- If spills occur, they are cleaned up right away.
- There is no dumping of polluting substances into the storm drains.
- Grass and other vegetation are planted as quickly as possible after soils are disturbed.

Some permits may require extensive pollution control measures or monitoring. All permits require some form of reporting.

There may be conditions which qualify an industry for exemption from a permit:

- Retain all stormwater on-site.
- Have all process, storage loading and unloading activities under cover (no contact with stormwater).

If you think you may require a Federal stormwater permit or verify whether or not your site qualifies for a permit exemption call either: Mike Mitchell (404)562-9303 or Floyd Welborn (404)562-9296 or Fax (404)562-8692. Or you can write them @ USEPA, Region IV

614 Forsyth St.
Atlanta, GA 30303



Don't waste your money on unnecessary disposal costs, there may be a better, more cost-effective way! Call 479-8126 for an on site assessment today...

Attention Automotive Repair Facilities

Over the last two years a large number of automotive repair facilities have reduced their generator status from *Small Quantity Generator (SQG)* to *Conditionally Exempt Small Quantity Generator (CESQG)* through the introduction of antifreeze recycling on site. The significance of a change in generator status is the reduction in regulatory requirements.

Antifreeze: The Largest Contributor to Generator Status

Antifreeze is the main contributor to monthly generator status at most automotive facilities. If your facility generates half of a 55gallon drum of antifreeze monthly you are generating 229.3lbs of hazardous waste. This would make you a **SQG** (220lbs-2200lbs/month) if you do not recycle on site. By recycling your used antifreeze on site, your antifreeze is not counted towards monthly hazardous waste totals, and thus you are lowered to **CESQG** status (less than 220lbs/month).

Further Benefits of Antifreeze Recycling

Another benefit of recycling antifreeze on site is that it lowers your liability for possible hazardous waste spills by your hazardous waste transporter. Many generators do not realize that they have "cradle to grave responsibility" for hazardous waste. This responsibility does not end until the antifreeze is recycled at the transporter's facility. If your transporter hauls your antifreeze off site be sure that it is being recycled. A letter from your hauler stating that the anti-

freeze is being recycled should be on file at your facility. If your hauler transports the used antifreeze as a waste it must be manifested. If the waste is manifested your responsibility does not end until you receive the second copy from the TSD (treatment, storage, and disposal) facility stating that the waste



has been accepted. Make sure this copy is signed and dated at the bottom. This copy should be stapled to the copy that the transporter originally gave you when he hauled the waste. Keep the record on file for at least three years. If your transporter does have a spill you can be held liable for cleanup cost. Although this may not be fair, it is the law. Recycle on site to avoid the liability of transporters getting you involved with a hazardous waste clean up. The cost of recycling on site is less than having a licensed hazardous waste hauler transport the waste. Recycling

on site not only saves you money on transportation and liability, but also returns new antifreeze so you do not have to buy new product. So, money is saved in transportation costs and in buying new antifreeze.

The three main reasons for recycling antifreeze on site:

- Can lower generator status in most cases, which allows for less regulations to follow.
- Eliminates liability of clean up costs for spills by the Hazardous Waste transporter.
- Saves money on transportation and buying new antifreeze.

Here are some of the requirements for **Small Quantity Generators**:

- You must apply for and obtain a FDEP I.D.#.
 - Containers must be marked with an accumulation start date-this goes on the moment waste is placed in the container-you have 180 days to have the container shipped off site by a licensed hazardous waste transporter.
 - You must file an Exception report for lost manifests or shipments.
 - You may not exceed 13,200lbs of waste in storage.
 - Your facility must have a current Emergency Response and Contin-gency Plan.
- These are just a few of the requirements for SQG's. Enough to cause you more headaches? It won't, if you recycle antifreeze on site!!

NEWSFLASH!! (continued from page 1)...

that this did not occur again. The SQG Program was delegated the responsibility to assess and write a management plan that would meet the BOCC's requirements. After much research and planning, a decision was made to implement a phased plan that included phased purchasing of equipment, new product introduction, and employee training. The facility is now designated as a non-handling facility of hazardous waste. We were the first in the State of Florida to achieve this distinction for a fleet maintenance facility.

If you are a facility that utilizes hazardous materials in your operations and/or services, and would like the opportunity to learn more about saving money through Pollution Prevention, please give us a call at (941) 479-8126.



Is there a topic that
you would like to see
covered next issue?
Call us at (941)479-8126

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

**July 22,1999
October 21, 1999**

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.

Bulk Rate
U.S. Postage
PAID
Ft. Myers, FL
Permit No. 756

P² Program
 1500 Monroe Street
 P.O. Box 398
 Ft. Myers, FL 33902