

# P<sup>2</sup> Quarterly

The Newsletter of Lee  
County's Pollution  
Prevention Program

Summer 1999

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# Is Compliance with Permits Pollution Prevention?

At the recent Florida Pollution Prevention Conference in Jacksonville one of the guest speakers was Bernie Hayes from the Region 4 office of the United States Environmental Protection Agency (EPA) in Atlanta. His position with the agency allows him a unique opportunity to see compliance efforts of companies who are required to obtain operation permits for their facilities. His definition of "permits" was an allowance for industries to pollute the environment with permissible discharges from their facility. Permissible discharges are the same as "acceptable levels" of pollutants to the environment. Acceptable?! To whom? Hayes stated that, "If every facility complied with their required permits, we would still have pollution entering the environment." This is the same governmental agency responsible for protecting the citizens of the United States from facilities polluting the water we drink, the air we breath, and the soil we derive crops from. Acceptable to whom?

Where do we begin to fix a bureaucratic system that allows companies to discharge "acceptable levels" of pollutants to our environment? Requirements in permits are designed to control "end of pipe" waste. This theory is the legacy our children will inherit and struggle to live with! It has been proven in our history that we reap what we sow. In today's society we struggle with situations that are not clearly defined as right or wrong, but what is acceptable. Some of the tragedies in today's society are directly connected to the Sixty's anti-establishment movement. Before that period of time we had a clearer view of right or wrong for behavior patterns in our society. During the Sixties up until the present, the question has become-is it acceptable? Depending on what your beliefs are today determines if it is acceptable.

So should "acceptable levels" of pollution be tolerated? Or should we look to new pollution prevention technologies today to shape our acceptable levels of pollution tomorrow? Pollution Prevention is the elimination and/or reduction of pollution at its' source. Most of the time the resources currently in use just need to be redirected into pollution prevention systems that allow for a quality product without regulatory end of pipe requirements. Raw material purchases, waste disposal, permit requirements, employee training and negative environmental facility impacts can be reduced or eliminated. The benefits for the facility are better public relations and higher monetary returns on the investment.

How do you start a pollution prevention program at your facility? What really works and what should you do to verify the solution to the situation is the right thing to do? These are some of the questions that can be answered by calling your Pollution Prevention/ Small Quantity Generator (P<sup>2</sup>/SQG) Program. You pay our salaries and we are here to assist all businesses in their search for environmental compliance.

**HAVE YOU  
HEARD  
ABOUT  
THIS...**

Lee County's Fleet Maintenance Facility, with the help of the P<sup>2</sup>/SQG Program, has changed its' generator status from a Large Quantity Generator to a Potential Generator of hazardous waste. This success has been documented in the USEPA publication "Profile of Local Government Operations" and has been featured by the National Association of Counties in their "Environmental Purchasing Starter Kit". If you are ready to explore the possibilities of pollution prevention, call us at (941)479-8126.

## Confused By "Environmental" Terms???

When reading information in or about environmental regulations, the amount of abbreviations and acronyms can make understanding those regulations quite difficult. The following list of terms may help you interpret those regulations a bit more easily:

### Regulations

<b>CFR:</b>	Code of Federal Regulations
<b>RCRA:</b>	Resource Conservation and Recovery Act
<b>CAA:</b>	Clean Air Act
<b>CWA:</b>	Clean Water Act
<b>SDWA:</b>	Safe Drinking Water Act
<b>CERCLA:</b>	(Superfund) Comprehensive Environmental Response, Compensation and Liability Act
<b>SARA:</b>	Superfund Amendments and Reauthorization Act
<b>FIFRA:</b>	Federal Insecticide, Fungicide and Rodenticide Act
<b>TSCA:</b>	Toxic Substances Control Act

### Agencies

<b>OSHA:</b>	Occupational Safety and Health Administration
<b>NIOSH:</b>	National Institute of Occupational Safety and Health (cont. pg 4)

# It is Occupational License Renewal Time...

If you have not received your renewal for the 1999-2000 Lee County occupational license yet, you will be receiving it soon. Your renewal is due by September 30, 1999 and your new license will be effective October 1, 1999-September 30, 2000. The total due will be dependent on the number of employees plus the hazardous waste surcharge. The surcharge must be paid if *ANY* amount of hazardous waste is generated by the business, regardless of amount.

If you feel that you should not be paying the hazardous waste surcharge, you must contact the Pollution Prevention Program at 479-8126 to determine if you qualify for an exemption. Once it is determined that you do not generate hazardous waste, you may acquire the exemption one of two ways. You can come to 1500 Monroe Street, First Floor and our staff will help you fill out the Activity Certification Affidavit (the exemption form), or we can send you the form, which needs to be notarized and returned. Should you decide to visit us in person, you will need to have a picture ID for verification. If you visit us in person, you will leave with a white original, along with a yellow copy for your business records. If you receive the exemption via mail, you will receive an original from us. The original needs to be submitted to the Tax Collector's office with your renewal fee, minus the \$20.00 surcharge. **DO NOT SUBMIT YOUR RENEWAL TO THE TAX COLLECTOR'S OFFICE WITHOUT THE EXEMPTION DOCUMENTATION. IF YOU PAY THE SURCHARGE AND LATER RECEIVE AN EXEMPTION, NO REFUNDS WILL BE GIVEN. IF YOU SUBMIT THE RENEWAL MINUS THE FEE, WITHOUT THE EXEMPTION, THE TAX COLLECTOR'S OFFICE WILL RETURN YOUR CHECK AND ASK FOR THE EXEMPTION OR PAYMENT OF THE SURCHARGE. IF THIS OCCURS AFTER OCTOBER 1, 1999, THE TAX COLLECTOR'S OFFICE WILL CHARGE A LATE FEE.** If you have received an exemption since the last renewal period and still see the surcharge on the renewal notice, you may submit the white original that you received at the time you were exempted and submit payment minus the surcharge.

Please try to address these issues early in the renewal period. Our goal is to assist in making this process as quick and painless as possible. By addressing the possibility of exemption early in the renewal period, much frustration for you, the businessperson, can be avoided.

# Pollution Prevention Week 1999

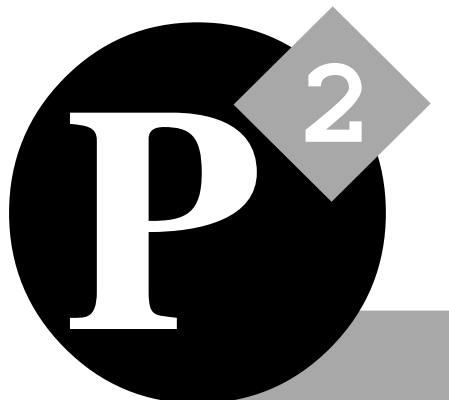
National Pollution Prevention (P2) Week will be here September 20<sup>th</sup>. You are probably wondering how Pollution Prevention can have an effect on your business or industry. Pollution Prevention can save you money, lower your liability, and give you more time to run your business instead of dealing with compliance issues. Pollution Prevention affects every aspect of our lives, and small changes in the way we look at our business operations can mean huge changes in our environment.

Every business and household can reduce pollution in some way. Whether it's lowering your thermostat at home to reduce fuel consumption at the power plant, or replacing a product that is hazardous with one that is not. Proven studies and common sense reveal that it's cheaper to reduce at the source than to dispose of hazardous waste. In many cases *product substitution* can totally eliminate a waste stream, reduce employee exposure, and in some cases the new product is cheaper. *Source reduction* also saves you time in regard to compliance with hazardous waste regulations, and the liability of having hazardous waste stored and transported. If you can reduce your generator status from Small Quantity Generator (more than 220lbs per month) to Conditionally Exempt Small Quantity Generator (less 220lbs monthly) you will have saved yourself the aggravation and labor cost of complying with all the regulations associated with the SQG status. This in it's self is a huge incentive considering the labor cost, and the reduced liability of enforcement actions for noncompliance.

For example: If you generate 30 gallons of antifreeze monthly, which is hauled as a hazardous waste, you are a Small Quantity Generator. However, If you recycle the antifreeze on site and use it as a product it will not count toward your monthly hazardous waste to-

als. As a result of recycling on site you will be a Conditionally Exempt Small Quantity Generator. That is of course if you have no other waste streams that generate hazardous waste. Even with one 15 gallon parts washer you will still be a CESQG. The main benefits of on site recycling are:

- (1) **Reduction of monthly hazardous waste from 250lbs to 0 for that waste stream.**
- (2) **Reduction in compliance issues associated with Small Quantity Generator Status.**



- (3) **Reduced liability of having hazardous waste transported.**
- (4) **Money saved in transportation and disposal costs, as well as buying new antifreeze.**

The point here is to show how any business can reduce the hazardous waste they generate if they are committed to pollution prevention. This technology offers a whole new way of assessing your business and can save you money at the same time. Don't be misled by small monetary gains at first. Over time your savings can be quite substantial. Even if waste reduction costs you some money up front it can save you money in a relatively short time. Don't be afraid to crunch the numbers or spend the money!

Three important things to keep in

mind when examining pollution prevention at your business: **reduce, reuse, recycle**.

**Reduction** or elimination of hazardous materials at the source is the most substantial way to reduce or eliminate hazardous wastes. *Product substitution* can eliminate hazardous waste from many processes. The question is "Will the new material cost more and will it do the job as well as the original material?". The internet can be a valuable tool for this purpose. Also, check Lee County's new P2 website for information <http://lee-county.com/pollution>. **Reuse** all waste materials that can be reused. Can you put any waste back into the process? Does the waste need to be treated first? What is the cost of treatment? Do we need a permit to do this? (Generally, waste that is treated and put back into the process does not require a permit from the Florida Dept. of Environmental Protection). One of the main problems discovered at **Auto Body Shops** is open containers. Three quick tips: (1) keep containers closed, (2) buy a distillation system if you are a SQG, and (3) mix only enough paint to do the job. Sounds simple right? It is! Doing these things can save you hundreds of dollars annually in hazardous waste disposal fees.

Lastly, **recycle** all waste materials that you can. In recent time many more products are being recycled that previously were not. Again, the internet can help you discover ways to do this. This can also save you money with the purchase of new materials for the process.

With the cost of new materials, the cost of transportation and disposal, and the cost of enforcement action, Pollution Prevention makes good sense. If you would like to obtain more information on your specific business and Pollution Prevention Technologies that can help you call our office at 479-8126 for an appointment.

# Regulatory Terms (continued from page 2)

**DOT:** Department of Transportation

**USEPA:** United States Environmental Protection Agency

**FDEP:** Florida Department of Environmental Protection

## Plans/Pollution Prevention Terminology

**P<sup>2</sup>:** Pollution Prevention

**R<sup>3</sup>:** Reduce, Reuse, Recycle

**SWP<sup>3</sup>:** Stormwater Pollution Prevention Plan

**SPCC:** Spill Prevention Control and Countermeasures

## Chemical Exposure Limits

**TLV:** Threshold Limit Value

**LC:** Lethal Concentration

**REL:** Recommended Exposure Limit

**PEL:** Permissible Exposure Limit

**ERP:** Emergency Response Plan

These are, by no means, all of the acronyms used in environmental regulations or articles. However, they are a good beginning for becoming familiar with the terms used. If you have questions about the terms, call us at (941)479-8126.

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

**October 21, 1999**  
**January 20, 2000**

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  
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 Permit No. 756

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