



P2
Quarterly

The Newsletter of Lee
County's Pollution
Prevention Program

Winter 2007

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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) 652-6126

Good Housekeeping, Can it Benefit You?

Business owners do not realize the positive benefits from keeping a clean facility when it comes time to expand their business. A clean facility will not only save visits from regulatory agencies, but can help with the process of selling your business, or applying for a commercial loan for the purpose of expanding, refinancing, or buying additional equipment for a business. Many purchasers, banks, and lenders request the business/property owner hire an environmental consulting company to perform a Phase I Environmental Site Assessment (ESA) on the subject property.

Phase I ESA's are a risk management tool for potential purchasers or lenders of commercial, industrial, and agricultural properties. The purpose of a Phase I ESA is to identify Recognized Environmental Conditions (REC's) connected with the subject property that a lender will be loaning money for. There are multiple steps to the research involved in the Phase I ESA process. This process involves researching aerials and historical uses of the property dating back to the early 1940's, researching local, state, and federal regulatory files and databases, and researching the subject property and adjacent properties by environmentally auditing the facility and interviewing property owners. This phase does not require soil or groundwater testing. A report is supplied to the potential purchaser or lender. A Phase I ESA ranges in price from \$1,500 to \$2,300 and provides the lender or potential purchaser of the facility/subject property a security blanket protecting them from environmental liability and assisting them in final decision making if a loan will be approved. A Phase I ESA is the first step in receiving a loan depending on how clean the facility is.

If improper housekeeping such as improper storage, or improper use and/or disposal of hazardous materials/waste that cause soil staining, stressed vegetation, and storage tanks (above and below ground) is identified in the report, the lender may request the site undergo a Phase II ESA. A Phase II ESA requires more detail and expense. A typical Phase II ESA usually requires soil, groundwater testing, or both, and usually has samples sent off to a lab for further analysis. The lab analysis can tell if a site is contaminated with metals, petroleum based products, and any chemicals used in the current or former uses of the subject property. A Phase II ESA can range in price depending on the identified REC's on the subject property. Remember these prices are additional to the Phase I ESA, and range from \$1,000 to \$15,000. The results from a Phase II ESA determine if a lender will provide the applicant with a loan, which is why it is important to keep a clean house. Results of bad housekeeping also can require a business to invest in expensive clean ups and less profits from the sale of land. It also could result in a law suit from neighboring businesses that have been impacted from storm water run off that polluted their land from your operations.

A clean house can reduce expenses in the loan process, reduce liability, protect workers and help your business succeed. It is also a key factor when regulatory agencies inspect the facility for compliance verifications. Clean first impressions generally have positive results on regulators as to how far they go with their inspections. They may want to use you as an example to show other industry competitors how things should be done and boost your public relations within your trade association members. Keep this in mind when you think of the goals and possibilities for growing your business and as an investment that brings positive results. Good housekeeping at your facility means a cleaner Southwest Florida environment.

Proper Waste Handling: The Positive Effect It Can Have On Your Wallet

When the P2 program performs a hazardous waste assessment for a business, we are often told that Lee County needs to do more to facilitate their business needs. Many business owners comment about the costs associated with handling hazardous waste properly. The P2 program addresses this concern by pointing out ways in which proper management can actually lower some of these costs. Educating owner/operators on correct procedures for handling their hazardous waste provides compliance options too. It is also always mentioned that any business expenses are tax deductible, but fines for not properly storing and disposing of hazardous waste are NOT tax deductible and often times the fines themselves are very expensive.

When the P2 Program does an assessment, for example, for an auto service & repair shop, a best management practice (BMP) handout is given to the business owner. The industry will typically have many different processes that generate waste. The BMP provides compliance minimums for these waste generating processes and makes recommendations for proper storage and disposal of these wastes. The BMP will always identify ways to reduce overall wastes, which results in lower costs for disposal. They also identify proper storage of each waste so that cross contamination of wastes does not occur, which could lead to more expensive or additional costs of disposal, or fines for not complying with the laws for hazardous waste management. The P2 program demonstrates the ways in which proper management is truly a cost effective strategy. An inspector can help the business owner make a waste determination for each procedure they use. Then educate them so they know how they are required to store and dispose of the final wastes. They can review the costs associated with these requirements.

Many times, business owners are unaware that improper management of their waste is costing more money than necessary. The P2 program is able to educate on compliance with state and federal laws, while demonstrating how to also save money. For example, at a typical inspection, a Material Safety Data Sheet (MSDS) is a good indicator to determine if a waste stream is a hazardous waste. The MSDS may indicate that a virgin product is non hazardous by a characteristic determination. However, once the product is used in a process, the waste that is generated can become a hazardous waste because it has been contaminated by exposure to other hazardous materials that were used in the same process. If the business also uses oil at the facility, and these wastes were being mixed and improperly stored together, the used oil, which could be hauled away for free, now becomes cross contaminated. These cross contaminated waste must now be treated as hazardous waste. It can cost several dollars a gallon to properly dispose of hazardous waste! However, when both wastes are kept separate and handled properly, the used oil can be picked up by a hauler for free (a hauler's list is given to each business during an assessment) and the hazardous waste from the first process could be stored in a separate drum or appropriate container to be disposed of as a hazardous waste. Since the volume of hazardous waste is reduced through proper management and storage, it will cost much less to dispose of and keep the facility in a less regulated classification.

There are many helpful strategies that are available to the business owner that are summarized in our BMP's, and the P2 program is dedicated to helping business owners comply with the law with these cost effective practices and strategies. Inspectors are always available to educate business owners and address site specific needs and concerns. Please contact the P2 Program at 239-652-6126 for help with your interest to properly manage all regulated waste streams you may generate.

Epinephrine, An Acute Hazardous Waste and How To Handle It to Save Money...

Epinephrine is essential to most medical practices, from ophthalmologists to veterinarians. If you have ever had an allergic reaction, or gone into cardiac arrest, epinephrine can help save your life. It is used for many non-life threatening situations as well. There is no argument that epinephrine is an essential and wonderful drug when used properly. However, all drugs are chemicals first and foremost and this is where the concern from regulators begins. Many chemicals can be harmful when used incorrectly or for the wrong reason; epinephrine is no exception. (Continued next page)

Most medical facilities need to follow regulations from various different government and medical agencies. One set of regulations that medical facilities may not be aware of is the Resource Conservation and Recovery Act (RCRA) and how it effects their operations. RCRA was established by the EPA to protect people and the environment from hazardous waste. Most medical facilities don't think they have any hazardous waste at their offices, but nothing can be further from the facts. Waste items from fluorescent bulbs (which contain mercury), to spent x-ray fixer (which contains silver) have to be disposed of in a certain manner according to RCRA regulations. But a drug as helpful as epinephrine, how can that be considered hazardous? Epinephrine used incorrectly can cause serious or life threatening conditions. To avoid this situation, the EPA has classified it as an acute hazardous waste. It is listed on the P-list as one of many chemicals that need to be disposed of in a precise manner. In order to be in compliance with the RCRA regulations and protected from possible fines, the rest of this article will address how to properly dispose of epinephrine.

The first thing to remember is epinephrine is not only considered a hazardous waste but an **acute hazardous waste**. The regulations surrounding disposal of these types of chemicals are more stringent.

To comply with RCRA regulations, start by setting up a storage container exclusively for waste epinephrine. Properly label the container and make sure no other waste is placed into this container. Anything that is mixed with epinephrine is now considered an acute hazardous waste, leaving you with a greater volume of waste to dispose of. The items that need to be placed in the container are as follows: empty epinephrine bottles and expired epinephrine that can no longer be used, any medications that epinephrine is added to, including any I.V. solutions that have not been completely used. Only empty syringes used to administer epinephrine can be placed in the biohazards red box.

An important thing to remember when dealing with waste epinephrine is that it needs to be picked up and disposed of by a licensed hazardous waste hauler; this is not the same as a biohazard waste hauler. These haulers will require a hazardous waste manifest when they transport the epinephrine for disposal. This document must be kept on site for 3 years. The amount of epinephrine waste allowed on site and still remain a Conditionally Exempt Small Quantity Generator (CESQG) is a very important detail. According to RCRA if a facility exceeds 1kg (2.2lbs) of an acute hazardous waste in any calendar month they are considered a Large Quantity Generator (LQG). LQG's have to follow many time consuming and expensive procedures. Avoiding this situation is very beneficial especially to medical facilities that have so many other regulations to comply with. 1kg is approximately 35 fluid ounces, so staying under this amount of epinephrine waste makes compliance with the regulations easier. A facility can have as much epinephrine product on site as needed; it is just the waste that cannot exceed 1kg. Keep in mind expired product is considered a waste, so keeping track of expiration dates and sending the product back to the manufacturer, prior to expiration if possible, will help keep cost down as well. More information about epinephrine, acute hazardous waste, and RCRA regulations can be found at: www.lee-county.com/naturalresources/pollution/ or call the P2 Program for assistance.

Growth Dictates Changes In Compliance Approach

With the tremendous growth Lee County has experienced over the past several months, it has become apparent that not all is good for the environment. For the majority of businesses that choose to comply with the minimum regulations, there are some that choose to violate the very laws designed to protect the environment that we all share. This places an unfair advantage for these law breaking businesses that compete against law abiding businesses. Many times during the P2 Program's educational outreach assessments, we discover business violations of the regulations that directly impact our environment. For those that make the compliance changes, we salute and stand with you! The ones that choose to ignore the minimums to achieve compliance will experience a new approach. Lee County is in the process of adopting Federal and State regulations that will empower Lee County to enforce these regulations and even the playing field for the business community. The first approach will always be educational assistance for those willing to listen and abide. For the others that choose to ignore the regulations, they will be subjected to the new enforcement approach. This approach will be backed by the Lee County Sheriffs Office and the Department of Environmental Protection.

Pollution Prevention Program To Partner With Keep Lee County Beautiful

The P2 Program is partnering with Keep Lee County Beautiful on several projects, one designed to educate students of Lee County's School District. This particular project will incorporate fun interactive sessions on topics such as what can be done around the house and yard to help prevent pollution, to what happens in the environment when pollution occurs.

There will be contests and fun prizes awarded to participating students. Also for certain age groups we will have an educational coloring book with a story about how pollution causes problems for people and animals who rely on a clean environment to live.

We feel this partnership will bring a valuable lesson to all students and brighten our environment's future.

Environmental Crimes Hotline

If you see an environmental crime and would like to report it, please contact the Pollution Prevention Program at 239-652-6126. You can remain anonymous and feel good about doing the right thing and protecting your environment.

Environmental crime effects all of us and the quality of life here in Lee County. We all can do our part by watching our neighborhoods and reporting suspicious activity as soon as possible. Illegal discharges of used oil is the most common complaint received by the P2 Program. One gallon of used oil dumped on the ground can contaminate as much as one million gallons of storm water making it unsuitable to sustain a healthy ecosystem. Polluted stormwater runoff causes more problems than what some people realize. Let's all work together in protecting our environment from crime today and for future generations yet to come.

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

**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 cancelations, 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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