

P² Quarterly

The Newsletter of Lee
County's Pollution
Prevention Program

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The Loss of a Friend

A few years ago our office was contacted by an out of town property owner who was cited for dumping roofing material on her Lehigh Acres lot. Since the owner had never been to Lee County, she did not know whom to contact to have the material removed from her property. She called our office for some help getting the material removed. We contacted Christo Enterprises, a local underground utility contractor who had the equipment to remove the material and dispose of it at the landfill. Bob Keiling, owner of Christo, said he would supply the equipment and labor to clean up the property as long as the landowner would pay for the disposal at the landfill. Bob sent Tim Eastman to meet us at the property and help with the required cleanup. Everything went very well in the cleanup process and the landowner was extremely happy she had got someone who she could afford on her fixed income to help.

That is how Tim Eastman was. A man of all men who would always help anyone who needed it. Tim died from injuries he received from a freak electrical accident at work. Tim is survived by his wife Donna, a daughter Stephanie, and his son Dustin. He was not only a great family man, but also a friend to many in our community. This newsletter is written in the memory of Tim, a true friend of the P²/SQG Program.

The Economics of Compliance

Every day in meeting rooms all across the country there are discussions on the costs associated with doing business. Talks on facility operations include: purchases of raw product, manufacturing and distribution, labor to perform specific task, and maintenance required at the facility. These meetings are designed to address impacts on bottom line profit and to plan future goals to be competitive. In the not too distant past, decisions associated with regulatory compliance centered on the cost of complying versus the fine amount of a violation if the facility was cited. Since a change in liability for who is held responsible for the violation, a lot more "decision makers" have found they are the ones who would face the fines and potential jail time for violations that occur under their watch.

A lot of management has turned to unique concepts to cover all the bases associated with regulatory compliance issues. Some of the concepts range from product substitutions in a process, to total elimination of the process and outsourcing that particular process to a facility better suited to handle the requirements. Another concept that is finally catching on is pollution prevention. This requires an in-depth assessment on what, when, and how to enact changes that only affect the regulatory requirements and not the quality of the product. Thankfully there are proven pollution prevention technologies that have been shown to do three major things for a business when incorporated into the planning of goals. One is that regulatory requirements have been reduced and/or eliminated which frees up the labor associated with filing reports, training employees, complying with permits and also reduces liability. The second is the cost associated with the purchase of raw hazardous materials and the disposal cost associated with the waste that results. And the third is the use of the accomplishments in attracting conscientious consumers through advertising. Pollution prevention utilized throughout the State has saved Florida businesses throughout the State hundreds of thousands of dollars in annual operational cost. Call the Pollution Prevention Program at 479-8126 to determine if we can help your business do the same.

How Do I Know If I Generate Hazardous Waste?

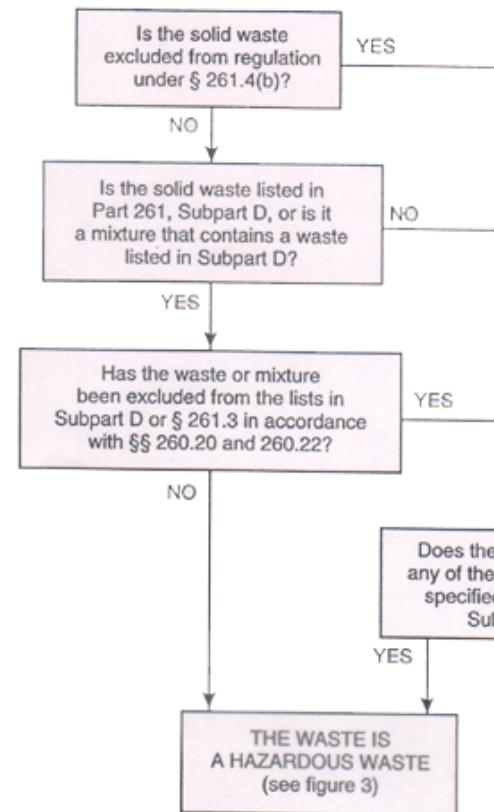
All businesses that generate wastes must make a waste determination. What is a waste determination? A waste determination can take many forms. A business may simply call a waste that they know to be hazardous "hazardous waste" in order to save themselves the time and money involved in having a sample tested. A business may simply call a waste non-hazardous waste based on limited knowledge. For instance, no business would even think of having a cardboard box tested as a hazardous waste. However, with a questionable waste that a business owner does not know how to dispose of, a series of steps can lead to the proper conclusion of how to determine whether or not the waste is hazardous. These steps include:

- (1) Can a determination be made by information obtained from a Material Safety Data Sheet(s), or knowledge of the process from which the waste was generated?
- (2) Is the waste listed in 40 CFR (RCRA)?
- (3) Does the waste display a characteristic listed under RCRA: Ignitability, Corrosivity, Reactivity, and Toxicity. (The definitions for each of these can be found on the following page.)

To the right, you can see the flow chart that represents how to determine whether or not a waste is hazardous. The definitions and regulations can be confusing, however, our program was created to assist you in making the decision about your waste and offering alternative solutions.

The Lee County Pollution Prevention Program can assist your business in making a waste determination. Please call us at 479-8126.

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DEFINITION OF A



NEW NPDES Construction Rule

The USEPA has amended the requirements for the Notice of Intent (NOI) for **Construction Activities**. It now requires an assessment of endangered species to be included in the Storm Water Pollution Prevention Plan (SWP3) and on the NOI. In 2000 the EPA is probably going to require a NOI and SWP3 for all commercial **construction** sites as part of the Phase 2 implementation.

Remember, the SWP3 is a living document including:

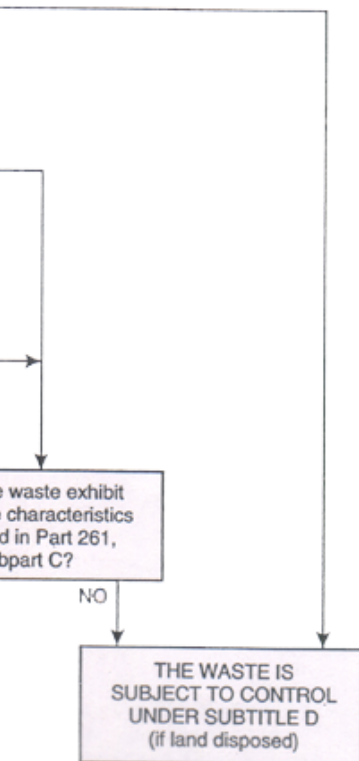
- (1) a description of project activity (with pollution prevention team),

- (2) site map,
- (3) an inventory with description of pollution sources on-site,
- (4) sediment and erosion controls to be used,
- (5) inspection/maintenance procedures and
- (6) a certification page signed by the property owner/operator and contractors must be included.

Keeping silts and sediments on-site is a very important part of construction activity. The installation and maintenance of silt fences is simple and substantially reduces the off-site impacts of construction.

Characteristic Hazardous Waste Defined

FIGURE 2
HAZARDOUS WASTE



Ignitability is

- When a liquid is greater than 24% alcohol by volume
- Has a Flash Point of less than 140° F
- Can ignite through friction, moisture absorption, or spontaneous chemical changes
- Is an ignitable compressed gas (defined by 40 CFR 173.300)
- Is an oxidizer (defined by 40 CFR 173.151)

Corrosivity is

- A liquid having a pH less than or equal to 2
- A liquid having a pH greater than equal to 12.5
- A liquid that corrodes steel at a rate greater than 6.35 mm per year

Reactivity is

- Unstable and readily undergoes violent change without detonation
- Reacts violently with water
- Forms potentially explosive mixtures with water
- Generates toxic gases when mixed with water
- Cyanide or sulfide bearing waste, when between 2 and 12.5 pH generates toxic gases
- Is capable of detonation or explosive reaction when subjected to a strong initiating source
- Is capable of detonation or explosive decomposition at standard temperature and pressure
- Is a forbidden explosive (defined by 49 CFR 173.51, 173.53 and 173.88)

Toxicity is

- A waste which exceeds the maximum concentration of any of the 39 contaminants in 40 CFR 261.24, Table 1, using the Toxicity Characteristic Leaching Procedure (TCLP).

DID YOU KNOW?

If you generate hazardous waste you are liable for the waste from cradle to grave. This means that if your hauler hauls your hazardous wastes to a TSD facility, has an accident enroute, and a spill occurs, you may be responsible for cleanup costs. Another example is, if you have an electrician replace your fluorescent tubes and they end up in a dumpster somewhere you are responsible for them! This can lead to expensive legal proceedings. These regulations are written to empower the generator to be careful about how the hazardous waste is handled. And make sure that you keep all disposal/recycling

records for a three year minimum.


CATHODE RAY TUBES

Cathode Ray Tubes, which are your standard TV and computer monitor tubes, have approximately three pounds of lead, which usually ends up in landfills or incinerators causing high lead emissions. These wastes are hazardous wastes as defined by RCRA. If you are a TV repairman, or computer repairman, and you generate circuit boards, cathode ray tubes or other wastes that contain heavy metals such as lead you now have an option to recycle. The state of Florida has given grants to recycling businesses

Did you know? (Continued from page 3)

in an effort to lower lead emissions at incinerators as well as at landfills. With this new recycling option comes stepped up enforcement for improper disposal.

If you are currently sending these tubes and circuit boards to the incinerator or landfill you are not in compliance with RCRA. Recycling these wastes may increase the cost of your services, but this is simply the cost of being in the electronics business. Recycling records need to be kept for a minimum of three years. If you have any questions, or need information on companies which provide this service, please call the Pollution Prevention Program at 479-8126.



Have a story idea? Need a speaker for your trade association meeting? Call us at 479-8126!!

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

January 20, 2000
April 27, 2000
July 27, 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
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