

P² Quarterly

The Newsletter of Lee
County's Pollution
Prevention Program

Spring 2000

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
Fax: 941/479-8108

Education and Assistance

The Pollution Prevention (P²) Program is fulfilling the requirements of a State mandate to perform on-site verifications of hazardous waste management. The mandate requires each County in the State to notify, assess and verify the on-site hazardous waste amounts generated at facilities that have the potential to generate hazardous waste. Lee County has been performing this requirement since 1989. During the years of field verifications, it became apparent to the P² Program that these facilities that generated hazardous waste had compliance problems and were subject to expensive fines from the State Department of Environmental Protection (DEP). DEP is responsible for enforcing the Resource Conservation and Recovery Act (RCRA), which is the Federal Law dictating hazardous waste management requirements. In this scenario a business was without a governmental resource to contact for education and/or assistance. In an effort to fill that void, the P² Program began the educational & assistance portion of our service to the business community.

The first action that the P² Program began on the educational front was to produce quarterly newsletters to update businesses on regulatory requirements (RCRA) and policy changes. Most businesses that were visited did not know the basic requirements for storage, handling, labeling, record keeping, employee training, and disposal options. Before we could implement recommended changes for a facility we needed to educate them on the basics in order to supply them with the knowledge of the cost associated with these minimum requirements. Once the base of education was established and the facility's management realized the full impact of RCRA's minimum requirements, further assistance was usually requested. The educational base is the first step and most important part of compliance assistance.

Now that the businesses had the educational base, the next step was establishing the assistance segment of the P² Program. The P² Program began research on specific industries to write and provide Best Management Practices (BMPs) to those types of businesses. BMPs are the core for assisting a facility with an operational compliance plan. The P² Program wrote BMPs with pollution prevention technologies built in to assist the facility with lowering their facility hazardous waste generator status. By lowering the status, the requirements for compliance were reduced as well. This approach has saved businesses thousands of dollars in operating cost and reduced the potential for monetary penalties for non-compliance. So far, the impacts of the P² Program has been positive to both the businesses and the

(continued on page 4)

It Couldn't Happen to Me..

Even small companies can be penalized by the USEPA. Tropical Cars of St. Croix, Inc. of New York was recently fined \$30,800 by the Federal Agency. Tropical, an automotive sales and service company, failed to detect used oil leaks. These leaks created a 600-sq.-ft. "pond" of used oil, two inches thick. Not only must the company pay the above fine, but they must also test the layer of soil below the visibly contaminated soil. If this soil is also contaminated, they must excavate further and repeat the process until clean soil is found.

Are you managing your waste storage area properly? If you are not sure, call us for an assessment at 479-8126. The Lee County P² Program is here to assist you with your compliance needs.

Does Your Transporter Have the Proper Certifications?

Recently, as reported by *Environmental Compliance Alert*, two independent hazardous waste transporters were penalized a combined amount of \$1.25 million for dumping paint and solvent wastes at sites without RCRA permits. As a result, the two owners also face 10 to 15 years in prison, respectively. As a business owner, you may not think that this situation relates to you, but it could. According to the Resource Conservation and Recovery Act (RCRA), hazardous waste generators are responsible for their waste from the "Cradle to Grave". If your hazardous waste transporter dumps your waste illegally, under the law, USEPA can charge you, the generator, for a portion of the site clean up. This is true even if the transporter has an approved state transporter's permit. While there is no foolproof method for insuring that such an incident does not happen to your business, there are ways of protecting yourself. First, before you contract with a transporter, check with the Department of Environmental Protection to make sure that the transporter has the proper state permit. You may also inquire if that transporter has had any enforcement action taken against them. Second, make sure that your transporter is using the correct paperwork and includes its DEP/EPA ID number in the transporter blank of the manifest. Also, check with the transporter regarding the amount of liability insurance that they carry. This will not release you from liability, but it can help in the long run.

Most reputable hazardous waste transporters will have no problem with a business "checking them out". If a potential transporter seems offended by questions, then you should question whether or not they are the right transporter for you.



Why waste your money

on unnecessary disposal costs?

There are better, more cost effective alternatives! Call

479-8126 for an on site assessment today...

What Resources Does the P² Program Have for You?

The P² Program has many State of Florida publications available for our businesses. They include:

- ♦ Florida's Handbook for Small Quantity Generator's of Hazardous Waste
- ♦ Florida Automotive Recycler's Handbook
- ♦ A Guide on Hazardous Waste Management for Florida's **Printers**
- ♦ A Guide on Hazardous Waste Management for Florida's **Fiber-Reinforced Plastic Manufacturers**
- ♦ A Guide on Hazardous Waste Management for Florida's **Pharmacies**
- ♦ A Guide on Hazardous Waste Management for Florida's **Laboratories**

Best Management Practices (BMPs) are available for:

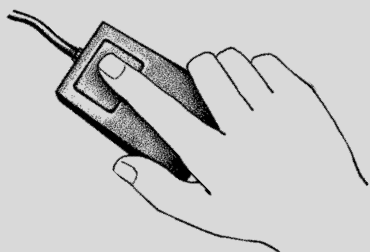
- ♦ **Automotive Repair**
- ♦ **Autobody Repair**
- ♦ **Marine Repair**
- ♦ **Photographic/X-ray Facilities**

We also have many other publications available to you, such as:

- ♦ A Pocket Guide to Material Safety Data Sheets and Labels
- ♦ List of Used Oil Collection Points
- ♦ Requirement Guidance for Conditionally Exempt Small Quantity Generators and Small Quantity Generators

- ♦ Hazardous Waste Hauler's List
- ♦ Small Quantity Generator Emergency Planning and Prevention Packet
- ♦ Small Quantity Generator Emergency Response and Contingency Plan Guidance
- ♦ Guidance Document on the Management of Spent Mercury Containing Lamps and Devices
- ♦ Used Oil Filter Disposal Guidance
- ♦ The Oil Mixing Rule

This is not a complete listing, so if there is a specific publication that you would like that is not listed, please contact us at (941)479-8126, and we will be happy to assist you.



Visit our website at:

<http://www.lee-county.com/pollution>

Education and Assistance (from page 1)

environment we all share.

The keys to a cleaner environment and a facility's compliance are regulatory education and pollution prevention assistance. Additional assistance provided by the P² Program is hazardous waste transporters list, MSDS handbooks, regulatory "cheat sheets", recycling information, updated pollution prevention technology, on-site safety presentations, trade association presentations, regulatory compliance research, and instant phone contact assistance.

Now that the differences between education and assistance are established, how can the P² Program assist your business in the new millennium?



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)

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

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