

**FINAL REPORT
ALACHUA COUNTY ENHANCED SMALL QUANTITY GENERATOR GRANT
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION AGREEMENT NO. S0359**

INTRODUCTION

On November 13, 2007 the Alachua County Environmental Protection Department (ACEPD) entered into an agreement with the Florida Department of Environmental Protection (FDEP) to perform hazardous waste generator compliance assistance visits (CAV) of businesses in Alachua County as part of the FDEP Enhanced Small Quantity Generator program (ESQG). This report presents a summary of the work performed by ACEPD, selected statistics on the CAV inspections and conclusions based on the results of the project.

SCOPE OF WORK

1. ACEPD conducted 122 hazardous waste generator compliance assistance visits (CAV) of businesses in Alachua County. The businesses were selected from a list provided by the FDEP Northeast District (NED). Priority was given to hazardous waste notifiers that had never been inspected by the NED, auto paint and body shops, auto repair facilities and drycleaners.

2. All CAV were documented using NED approved inspection forms and checklists in order to identify potential hazardous waste compliance violations. The following forms were used to document the CAV inspections: CESQG Checklist, SQG Checklist, Used Oil Checklist, Short Form Inspection (Notice of potential Hazardous Waste / Used Oil non-compliance), FDEP Multimedia Program, Dry cleaning sector inspection checklist and a business closure notification memorandum. Appendix A contains samples of all the forms used for the CAV inspections. Additionally all inspections were documented with digital pictures. All the checklists, documentation, pictures and data were managed electronically using a Microsoft Sharepoint Site. Figure 1 shows screen captures of the SharePoint site.

4. Compact Discs containing summary information and all the documents associated with the CAV inspections were mailed to FDEP NED on March 5, April 15 and June 6, 2008. Quarterly progress reports were submitted on January 22 and April 18, 2008.

5. As part of the CAV inspections, ACEPD also provided compliance assistance to the businesses. The materials provided included, but was not limited to: DEP SQG Handbook, stencils, labels, vendor information, hazardous waste regulations fact sheets, sample contingency plan diagrams and container inspections logs. The compliance assistance materials provided were recorded in the Short Form Inspection. Additionally, a copy of the "Notification of Regulated Activity Form 8700-12FL" was provided to all regulated non-notifiers that were identified as part of the CAV.

6. CAV information was also documented in the FDEP CHAZ_SQG data management system. In addition to the information regularly entered into CHAZ_SQG as part of the SQG Verification program, the following items were entered into CHAZ_SQG: EPA Identification Number if the business had been assigned one by the FDEP, EPA Waste Codes for each hazardous waste identified, name of the hazardous waste and/or used oil transporter(s) picking up the waste, and latitude and longitude coordinates for all facilities verified under the ESQG program. Additionally, select violations from the CESQG, SQG and Used Oil Checklist were also entered into CHAZ_SQG.

7. The FDEP NED provided inspector training for ACEPD staff. NED staff was available for technical assistance and extensive communication via phone and email was maintained throughout the project.

Figure 1. ESQG SharePoint Site

The image shows two screenshots from the E-SQG SharePoint site. The left screenshot displays a list of 'E-SQG Inspections' with columns for Name, Actions, Settings, Generator Class, Inspection Date, Inspection Status, Inspection Type, Inspection Location, Inspection Notes, and Inspection Results. The right screenshot shows a detailed view of an inspection for 'Rip's Cleaners # 12', including fields for Facility, ACEPD#, FDEP#, Generator Class, Inspection Date, Violations, SIC Code, Referral For Enforcement to FDEP, Completed, Submitted to FDEP, Attachments, and a list of violation details.

8. ACEPD staff responded to a total of 4 hazardous waste related complaints sent by the NED.

RESULTS

ACEPD completed a total of 122 hazardous waste generator compliance assistance visits (CAV) of businesses in Alachua County. Appendix B contains a complete listing and summary information of all the inspections completed as part of this project.

Table 1 list the number of inspections conducted by business type, as defined by the Standard Industrial Classification (SIC) Code. Automotive and dry cleaning facilities represented the largest number of inspections.

Table 1. ESQG Inspections by SIC Code

SIC Code	ESQG Inspections
5511 - RETAIL TRADE - NEW AND USED CAR DEALERS	24
7532 - SERVICES - TOP AND BODY REPAIR AND PAINT SHOPS	22
7538 - SERVICES - GENERAL AUTOMOTIVE REPAIR SHOPS	18
7216 - SERVICES - DRY CLEANING PLANTS	14
8734 - SERVICES - TESTING LABORATORIES	6
3732 - MANUFACTURING - BOAT BUILDING AND REPAIRING	3
4953 - TRANS. & UTILITIES - REFUSE SYSTEMS	3
7539 - AUTOMOTIVE REPAIR SHOPS, NEC	3
8731 - SERVICES - COMMERCIAL PHYSICAL RESEARCH	3
2951 - MANUFACTURING - ASPHALT PAVING MIXTURES AND BLOCKS	2
5399 - RETAIL TRADE - MISCELLANEOUS GENERAL MERCHANDISE STORES	2

SIC Code	ESQG Inspections
7334 - SERVICES - PHOTOCOPYING AND DUPLICATING SERVICES	2
7533 - SERVICES - AUTO EXHAUST SYSTEM REPAIR SHOPS	2
8732 - SERVICE NONMEDICAL RESEARCH LAB	2
1422 - MINING - CRUSHED AND BROKEN LIMESTONE	1
1542 - CONSTRUCTION - NONRESIDENTIAL CONSTRUCTION, NEC	1
2711 - MANUFACTURING - NEWSPAPERS	1
2741 - MANUFACTURING - MISCELLANEOUS PUBLISHING	1
2759 - MANUFACTURING - COMMERCIAL PRINTING, NEC	1
2796 - MANUFACTURING - PLATE MAKING SERVICES	1
3411 - MANUFACTURING - METAL CANS	1
3669 - MANUFACTURING - COMMUNICATIONS EQUIPMENT, NEC	1
3679 - MANUFACTURING - ELECTRONIC COMPONENTS, NEC	1
5013 - WHOLESALE TRADE - MOTOR VEHICLE SUPPLIES AND NEW PARTS	1
5099 - WHOLESALE TRADE - DURABLE GOODS, NEC	1
5169 - WHOLESALE TRADE - CHEMICALS AND ALLIED PRODUCTS, NEC	1
5211 - RETAIL TRADE - LUMBER AND OTHER BUILDING MATERIALS	1
5261 - RETAIL TRADE - RETAIL NURSERIES AND GARDENS	1
7641 - SERVICES - REUPHOLSTERY AND FURNITURE REPAIR	1
7699 - REPAIR SERVICES, NEC	1
Total Inspections	122

Table 2 shows the compliance status of the business inspected. As shown in the Table, 21 businesses were in compliance with the hazardous waste regulations, 41 were out of compliance and 60 were out of business at the time of the inspection. Four businesses were referred to the FDEP NED for compliance issues: two testing laboratories (8734), one communications equipment manufacturer (3669) and one automobile dealer (5511).

Thirteen of the 41 out of compliance business corrected all their violations by the end of the CAV inspection. ACEPD will continue to provide follow-up inspection and compliance assistance in order to bring back the remaining 28 facilities in compliance with the hazardous waste regulations. NED staff will be notified once compliance has been obtained.

Table 2. Compliance Status of Business during ESQG Inspections

SIC Code	In Compliance	Out of Compliance	Corrected During Inspection	Closed
1422 - MINING - CRUSHED AND BROKEN LIMESTONE				1
1542 - CONSTRUCTION - NONRESIDENTIAL CONSTRUCTION, NEC	1			
2711 - MANUFACTURING - NEWSPAPERS	1			
2741 - MANUFACTURING - MISCELLANEOUS PUBLISHING	1			
2759 - MANUFACTURING - COMMERCIAL PRINTING, NEC				1
2796 - MANUFACTURING - PLATE MAKING SERVICES		1		

SIC Code	In Compliance	Out of Compliance	Corrected During Inspection	Closed
2851 - MANUFACTURING - PAINTS AND ALLIED PRODUCTS				1
2951 - MANUFACTURING - ASPHALT PAVING MIXTURES AND BLOCKS	1			
3411 - MANUFACTURING - METAL CANS	1			
3669 - MANUFACTURING - COMMUNICATIONS EQUIPMENT, NEC		1		
3679 - MANUFACTURING - ELECTRONIC COMPONENTS, NEC			1	
3732 - MANUFACTURING - BOAT BUILDING AND REPAIRING				3
4953 - TRANS. & UTILITIES - REFUSE SYSTEMS				3
5013 - WHOLESALE TRADE - MOTOR VEHICLE SUPPLIES AND NEW PARTS				1
5099 - WHOLESALE TRADE - DURABLE GOODS, NEC				1
5169 - WHOLESALE TRADE - CHEMICALS AND ALLIED PRODUCTS, NEC		1		
5211 - RETAIL TRADE - LUMBER AND OTHER BUILDING MATERIALS			1	
5261 - RETAIL TRADE - RETAIL NURSERIES AND GARDENS				1
5399 - RETAIL TRADE - MISCELLANEOUS GENERAL MERCHANDISE STORES	2			
5511 - RETAIL TRADE - NEW AND USED CAR DEALERS	3	9		12
7216 - SERVICES - DRY CLEANING PLANTS	3	8	1	2
7334 - SERVICES - PHOTOCOPYING AND DUPLICATING SERVICES	1			1
7532 - SERVICES - TOP AND BODY REPAIR AND PAINT SHOPS		4	5	13
7533 - SERVICES - AUTO EXHAUST SYSTEM REPAIR SHOPS		1		1
7538 - SERVICES - GENERAL AUTOMOTIVE REPAIR SHOPS	3	1	5	9
7539 - AUTOMOTIVE REPAIR SHOPS, NEC		1		2
7641 - SERVICES - REUPHOLSTERY AND FURNITURE REPAIR				1
7699 - REPAIR SERVICES, NEC	1			
8731 - SERVICES - COMMERCIAL PHYSICAL RESEARCH	1			2
8732 - SERVICE NONMEDICAL RESEARCH LAB		1		1
8734 - SERVICES - TESTING LABORATORIES	2			4
Total	21	28	13	60

Table 3 has a detailed breakdown of the violations identified during the CAV inspections. Labeling violations in hazardous waste and used oil containers were by far the most common violations. In addition to being the most common type of violations, they are also the easiest to correct, especially if the inspectors have a supply of labels, stickers and stencils. A large number of the labeling violations identified were corrected by the end of the CAV inspection.

Table 3. Common Violations

Violation	Count
Unlabeled containers § 262.34	21
Failure to label containers § 279.22	14
Drycleaners (Floor Sealing)	8
Open containers § 265.173	8
Weekly container inspection records § 265.174	6
Authorities not notified § 265.37	5
Undated containers § 262.34	5
Failure to perform hazardous waste determination § 262.11	4
Failure to respond to releases § 279.22	4
Manifests § 262.40, § 262.44	4
Facility exceeds 90/180 day time limit § 262.34	3
Failure to ensure delivery of HW to proper HW facility § 261.5	3
Failure to notify as hazardous waste generator § 262.12	3
Modified contingency plan § 262.34	3
Test results, waste analyses, and determinations § 262.40(c)	3
Failure to label used oil filter container § 62-710.850(5)(a), FAC	2
Improper storage of used oil filters § 62-710.850(5)(a), FAC	2
Inadequate aisle space § 265.35	2
Failure to provide personnel training § 262.34, 265.16	1
Failure to provide secondary containment § 62-710.401(6), FAC	1
Improper disposal of used oil filters § 62-710.850(1), FAC	1
Leaking or rusting containers § 265.171	1
Non-Hazmat Labeling	1

Table 4 shows a breakdown by month of the amount of time spent by ACEPD staff conducting and documenting the ESQG CAV inspections. As shown in table 4, the amount required to complete the inspections was almost equally divided between field and office time. Table 5 shows an estimated breakdown by business type.

Table 4. Hours by month

Date	Field Time	Office Time	Total Time
November 2007	2.0	3.0	5.0
December 2007	5.0	6.0	11.0
January 2008	28.5	5.0	33.5

Date	Field Time	Office Time	Total Time
February 2008	105.0	122.0	227.0
March 2008	105.0	66.5	171.5
April 2008	133.0	80.0	213.0
May 2008	110.0	190.0	300.0
June 2008	4.0	43.5	47.5
Total	492.5	516.0	1008.5

Table 5. Hours by business type

SIC Code	Field	Office	Total
5511 - RETAIL TRADE - NEW AND USED CAR DEALERS	87.4	133.6	221.0
7538 - SERVICES - GENERAL AUTOMOTIVE REPAIR SHOPS	77.6	76.3	153.9
7532 - SERVICES - TOP AND BODY REPAIR AND PAINT SHOPS	83.0	70.4	153.4
7216 - SERVICES - DRY CLEANING PLANTS	78.0	75.4	153.4
8734 - SERVICES - TESTING LABORATORIES	22.9	13.4	36.3
7334 - SERVICES - PHOTOCOPYING AND DUPLICATING SERVICES	13.2	15.2	28.4
4953 - TRANS. & UTILITIES - REFUSE SYSTEMS	11.5	16.8	28.3
7539 - AUTOMOTIVE REPAIR SHOPS, NEC	15.0	9.3	24.3
8731 - SERVICES - COMMERCIAL PHYSICAL RESEARCH	14.8	9.0	23.8
3679 - MANUFACTURING - ELECTRONIC COMPONENTS, NEC	6.6	8.0	14.6
5211 - RETAIL TRADE - LUMBER AND OTHER BUILDING MATERIALS	6.0	7.6	13.6
7533 - SERVICES - AUTO EXHAUST SYSTEM REPAIR SHOPS	4.8	7.5	12.3
3732 - MANUFACTURING - BOAT BUILDING AND REPAIRING	8.0	3.2	11.2
2741 - MANUFACTURING - MISCELLANEOUS PUBLISHING	3.4	6.9	10.3
2796 - MANUFACTURING - PLATE MAKING SERVICES	3.4	6.9	10.3
2951 - MANUFACTURING - ASPHALT PAVING MIXTURES AND BLOCKS	3.4	6.9	10.3
5013 - WHOLESALE TRADE - MOTOR VEHICLE SUPPLIES AND NEW PARTS	3.4	6.9	10.3
5261 - RETAIL TRADE - RETAIL NURSERIES AND GARDENS	3.4	6.9	10.3
5399 - RETAIL TRADE - MISCELLANEOUS GENERAL MERCHANDISE STORES	6.5	3.7	10.2
2759 - MANUFACTURING - COMMERCIAL PRINTING, NEC	3.4	6.7	10.1
3411 - MANUFACTURING - METAL CANS	3.4	6.7	10.1
8732 - SERVICE NONMEDICAL RESEARCH LAB	6.3	3.6	9.9
7699 - REPAIR SERVICES, NEC	5.0	3.1	8.1
2711 - MANUFACTURING - NEWSPAPERS	4.9	3.0	7.9
5099 - WHOLESALE TRADE - DURABLE GOODS, NEC	4.9	3.0	7.9
7641 - SERVICES - REUPHOLSTERY AND FURNITURE REPAIR	4.9	3.0	7.9
1542 - CONSTRUCTION - NONRESIDENTIAL CONSTRUCTION, NEC	1.5	0.6	2.1
2851 - MANUFACTURING - PAINTS AND ALLIED PRODUCTS	1.5	0.6	2.1
3669 - MANUFACTURING - COMMUNICATIONS EQUIPMENT, NEC	1.5	0.6	2.1
5169 - WHOLESALE TRADE - CHEMICALS AND ALLIED PRODUCTS, NEC	1.5	0.6	2.1
1422 - MINING - CRUSHED AND BROKEN LIMESTONE	1.4	0.6	2.0

CONCLUSIONS

1. Participation in the ESQG program provided useful training for ACEPD inspectors and strengthened the working relationship between ACEPD and FDEP NED.
2. ESQG inspections are significantly more time consuming than the routine inspections performed by County staff. Specifically, the amount of paperwork required to document an ESQG inspections is almost double the amount required to document a regular SQG inspection.
3. Some of the forms used were duplicative and time consuming, however they provided a much better picture of the compliance status of the business inspected. Especially useful was the Short Form Inspection (Notice of potential Hazardous Waste / Used Oil non-compliance) which provided a great summary of the CAV inspection.
4. The violations tracked in CHAZ_SQG were selected from the CESQG and SQG checklists; for future projects we recommend using the violations highlighted in the Short Form Inspection (Notice of potential Hazardous Waste / Used Oil non-compliance).
5. Improper labeling was the most common violation. These violations are typically very easy to correct especially if the inspectors have available compliance assistance materials such as stencils, labels and stickers. 32% of the out of compliance facilities were brought back into compliance by the end of the CAV inspection due to the field availability of compliance assistance materials.
6. Microsoft Sharepoint is a flexible and easy to use platform to store inspection data, electronic documents and digital pictures. Alachua County currently has an external connector to the server so partners outside the County network can access the files in real time. This added capability can result in increased efficiency and collaboration between the agencies and can reduce or eliminate the need to transmit documents via email or regular mail.