

FINAL REPORT

ALACHUA COUNTY ENHANCED SMALL QUANTITY GENERATOR GRANT – YEAR 2 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 during year 2 of the agreement by ACEPD, selected statistics on the CAV inspections and conclusions based on the results of the project.

SCOPE OF WORK

1. ACEPD conducted 83 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. Additionally, ACEPD staff conducted follow-up CAV inspection at the facilities that were found out of compliance during year one of the agreement.
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. Additionally all inspections were documented with digital pictures. All the checklists, documentation, pictures and data were managed electronically using a Microsoft Sharepoint Site.
3. Compact Discs containing summary information and all the documents associated with the CAV inspections were mailed to FDEP NED on January 5, March 17 and June 3, 2009. A progress report was submitted on January 5, 2009.
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 continued to provide inspector training for ACEPD staff. NED staff was available for technical assistance and extensive communication via phone and email was maintained throughout the project.

8. ACEPD staff responded to a total of 1 hazardous waste related complaints sent by the FDEP NED.

RESULTS

ACEPD completed a total of 83 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 auto dealers 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	12
7538 - GENERAL AUTOMOTIVE REPAIR SHOPS	11
5311 - RETAIL TRADE - DEPARTMENT STORES	8
7532 - SERVICES - TOP AND BODY REPAIR AND PAINT SHOPS	6
7533 - SERVICES - AUTO EXHAUST SYSTEM REPAIR SHOPS	5
5541 - GASOLINE SERVICE STATIONS	5
8734 - SERVICES - TESTING LABORATORIES	4
7216 - SERVICES - DRY CLEANING PLANTS	4
5399 - RETAIL TRADE - MISCELLANEOUS GENERAL MERCHANDISE STORES	3
4953 - TRANS. & UTILITIES - REFUSE SYSTEMS	2
4813 - TELEPHONE COMMUNICATIONS, EXCEPT RADIOTELEPHONE	2
1623 - CONSTRUCTION - WATER, SEWER, AND UTILITY LINES	2
9987 - AUTOMOTIVE PAINT AND BODY - FLORIDA CASV	1
8211- SERVICES - ELEMENTARY AND SECONDARY SCHOOLS	1
7699 - SERVICES - REPAIR SERVICES NEC	1
7513 - SERVICES - TRUCK RENTAL AND LEASING, NO DRIVERS	1
7336 - COMMERCIAL ART AND GRAPHIC DESIGN	1
6411 - FIN, INS & REAL EST - INSURANCE AGENTS, BROKERS, AND SERVICE	1

5211 - RETAIL TRADE - LUMBER AND OTHER BUILDING MATERIALS	1
5198 - WHOLESALE TRADE - PAINTS, VARNISHES, AND SUPPLIES	1
5169 - WHOLESALE TRADE - CHEMICALS AND ALLIED PRODUCTS, NEC	1
5063 - WHOLESALE TRADE - ELECTRICAL APPARATUS AND EQUIPMENT	1
4231 - TRANS. & UTILITIES - TRUCKING TERMINAL FACILITES	1
4215 - TRANS. & UTILITIES - COURIER SERVICES, EXCEPT BY AIR	1
3999 - MANUFACTURING - MANUFACTURING INDUSTRIES, NEC	1
3993 - MANUFACTURING - SIGNS AND ADVERTISING SPECIALTIES	1
3492 - MANUFACTURING - FLUID POWER VALVES AND HOSE FITTINGS	1
2911 - MANUFACTURING - PETROLEUM REFINING	1
2869 - INDUSTRIAL ORGANIC CHEMICALS	1
2434 - MANUFACTURING - WOOD KITCHEN CABINETS	1
1422 - MINING - CRUSHED AND BROKEN LIMESTONE	1
Total Inspections	83

Table 2 shows the compliance status of the business inspected. As shown in the Table, 50 businesses were in compliance with the hazardous waste regulations, 33 were out of compliance. Of the 33 out of compliance business, 6 returned to compliance by the end of the CAV inspection, 26 were back in compliance after a follow-up visit and 1 remains out of compliance. ACEPD will continue to provide follow-up inspection and compliance assistance in order to bring back the remaining facility in compliance with the hazardous waste regulations. NED staff will be notified once compliance has been obtained. Three facilities were referred to the FDEP NED for compliance issues.

Table 2. Compliance Status of Business during ESQG Inspections

SIC Code	In Compliance	Out of Compliance	Corrected by end of Inspection	Corrected after Follow-up Inspection	Not Corrected
1422 - MINING - CRUSHED AND BROKEN LIMESTONE		1	1		
1623 - CONSTRUCTION - WATER, SEWER, AND UTILITY LINES	2				
2434 - MANUFACTURING - WOOD KITCHEN CABINETS		1		1	
2869 - INDUSTRIAL ORGANIC CHEMICALS	1				
2911 - MANUFACTURING - PETROLEUM REFINING	1				
3492 - MANUFACTURING - FLUID POWER VALVES AND HOSE FITTINGS	1				
3993 - MANUFACTURING - SIGNS AND ADVERTISING SPECIALTIES		1	1		
3999 - MANUFACTURING - MANUFACTURING INDUSTRIES, NEC	1				
4215 - TRANS. & UTILITIES - COURIER		1			1

SERVICES, EXCEPT BY AIR					
4231 - TRANS. & UTILITIES - TRUCKING TERMINAL FACILITIES	1				
4813 - TELEPHONE COMMUNICATIONS, EXCEPT RADIOTELEPHONE	2				
4953 - TRANS. & UTILITIES - REFUSE SYSTEMS	2				
5063 - WHOLESALE TRADE - ELECTRICAL APPARATUS AND EQUIPMENT	1				
5169 - WHOLESALE TRADE - CHEMICALS AND ALLIED PRODUCTS, NEC		1		1	
5198 - WHOLESALE TRADE - PAINTS, VARNISHES, AND SUPPLIES		1	1		
5211 - RETAIL TRADE - LUMBER AND OTHER BUILDING MATERIALS	1				
5311 - RETAIL TRADE - DEPARTMENT STORES		1	1		
5311 - RETAIL TRADE - DEPARTMENT STORES	4	3		3	
5399 - RETAIL TRADE - MISCELLANEOUS GENERAL MERCHANDISE STORES	3				
5511 - RETAIL TRADE - NEW AND USED CAR DEALERS	6	6		6	
5541 - GASOLINE SERVICE STATIONS	5				
6411 - FIN, INS & REAL EST - INSURANCE AGENTS, BROKERS, AND SERVICE	1				
7216 - SERVICES - DRY CLEANING PLANTS		4		4	
7336 - COMMERCIAL ART AND GRAPHIC DESIGN	1				
7513 - SERVICES - TRUCK RENTAL AND LEASING, NO DRIVERS		1		1	
7532 - SERVICES - TOP AND BODY REPAIR AND PAINT SHOPS	1	5		5	
7533 - SERVICES - AUTO EXHAUST SYSTEM REPAIR SHOPS	3	2		2	
7538 - GENERAL AUTOMOTIVE REPAIR SHOPS		1	1		
7538 - GENERAL AUTOMOTIVE REPAIR SHOPS	7	3	1	2	
7699 - SERVICES - REPAIR SERVICES NEC	1				
8211- SERVICES - ELEMENTARY AND SECONDARY SCHOOLS	1				
8734 - SERVICES - TESTING LABORATORIES	3	1		1	
9987 - AUTOMOTIVE PAINT AND BODY - FLORIDA CASV	1				
TOTALS	50	33	6	26	1

Table 3 has a detailed breakdown of the violations identified during the CAV inspections. Labeling violations and open containers 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	14
Failure to label containers § 279.22	7
Open containers § 265.173	7
Weekly container inspection records § 265.174	5
Drycleaners (Floor Sealing)	4
Failure to label used oil filter container § 62-710.850(5)(a)	4
Improper storage of used oil filters § 62-710.850(5)(a)	4
Manifests § 262.40, § 262.44	4
Failure to provide secondary containment § 62-710.401(6)	3
Failure to notify as hazardous waste generator § 262.12	2
Failure to respond to releases § 279.22	2
Modified contingency plan § 262.34	2
Test results, waste analyses, and determinations § 262.40(c)	2
Undated containers § 262.34	2
Authorities not notified § 265.37	1
Facility exceeds 90/180 day time limit § 262.34	1
Failure to ensure delivery of HW to proper HW facility § 261.5	1
Failure to perform hazardous waste determination § 262.11	1
Leaking or rusting containers § 265.171	1
Total Violations	67

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
July 2008	10.5	3.0	13.5
August 2008	76.5	25.5	102.0
September 2008	55.0	13.0	68.0
October 2008	5.0	2.0	7.0
November 2008	18.0	7.0	25.0
December 2008	23.5	18.5	42.0
January 2009	34.0	25.5	59.5

February 2009	66.0	39.0	105.0
March 2009	177.0	27.0	204.0
April 2009	142.0	2.0	144.0
May 2009	97.50	37.0	134.5
Total	705.0	199.5	904.5

Table 5. Hours by business type

SIC Code	Field	Office	Total
5311 - RETAIL TRADE - DEPARTMENT STORES	68.0	19.2	87.2
5511 - RETAIL TRADE - NEW AND USED CAR DEALERS	68.0	19.2	87.2
7532 - SERVICES - TOP AND BODY REPAIR AND PAINT SHOPS	51.0	14.4	65.4
7538 - SERVICES - GENERAL AUTOMOTIVE REPAIR SHOPS	51.0	14.4	65.4
5541 - GASOLINE SERVICE STATIONS	42.5	12.0	54.5
7533 - SERVICES - AUTO EXHAUST SYSTEM REPAIR SHOPS	42.5	12.0	54.5
7538 - GENERAL AUTOMOTIVE REPAIR SHOPS	42.5	12.0	54.5
5511 - MOTOR VEHICLE DEALERS (NEW AND USED)	34.0	9.6	43.6
7216 - SERVICES - DRY CLEANING PLANTS	34.0	9.6	43.6
5399 - RETAIL TRADE - MISCELLANEOUS GENERAL MERCHANDISE STORES	25.5	7.2	32.7
8734 - SERVICES - TESTING LABORATORIES	25.5	7.2	32.7
1623 - CONSTRUCTION - WATER, SEWER, AND UTILITY LINES	17.0	4.8	21.8
4813 - TELEPHONE COMMUNICATIONS, EXCEPT RADIOTELEPHONE	17.0	4.8	21.8
4953 - TRANS. & UTILITIES - REFUSE SYSTEMS	17.0	4.8	21.8
5063 - WHOLESALE TRADE - ELECTRICAL APPARATUS AND EQUIPMENT	8.5	2.4	10.9
1422 - MINING - CRUSHED AND BROKEN LIMESTONE	8.5	2.4	10.9
2434 - MANUFACTURING - WOOD KITCHEN CABINETS	8.5	2.4	10.9
2869 - INDUSTRIAL ORGANIC CHEMICALS	8.5	2.4	10.9
2911 - MANUFACTURING - PETROLEUM REFINING	8.5	2.4	10.9
3492 - MANUFACTURING - FLUID POWER VALVES AND HOSE FITTINGS	8.5	2.4	10.9
3993 - MANUFACTURING - SIGNS AND ADVERTISING SPECIALTIES	8.5	2.4	10.9
3999 - MANUFACTURING - MANUFACTURING INDUSTRIES, NEC	8.5	2.4	10.9
4215 - TRANS. & UTILITIES - COURIER SERVICES, EXCEPT BY AIR	8.5	2.4	10.9
4231 - TRANS. & UTILITIES - TRUCKING TERMINAL FACILITIES	8.5	2.4	10.9
5169 - WHOLESALE TRADE - CHEMICALS AND ALLIED PRODUCTS, NEC	8.5	2.4	10.9
5198 - WHOLESALE TRADE - PAINTS, VARNISHES, AND SUPPLIES	8.5	2.4	10.9
5211 - RETAIL TRADE - LUMBER AND OTHER BUILDING MATERIALS	8.5	2.4	10.9
6411 - FIN, INS & REAL EST - INSURANCE AGENTS, BROKERS, AND SERVICE	8.5	2.4	10.9

7336 - COMMERCIAL ART AND GRAPHIC DESIGN	8.5	2.4	10.9
7513 - SERVICES - TRUCK RENTAL AND LEASING, NO DRIVERS	8.5	2.4	10.9
7699 - SERVICES - REPAIR SERVICES NEC	8.5	2.4	10.9
8211- SERVICES - ELEMENTARY AND SECONDARY SCHOOLS	8.5	2.4	10.9
8734 - RESEARCH, DEVELOPMENT, AND TESTING SERVICES	8.5	2.4	10.9
9987 - AUTOMOTIVE PAINT AND BODY - FLORIDA CASV	8.5	2.4	10.9

CONCLUSIONS

1. Participation in the ESQG program provided very 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. 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.
5. Microsoft Sharepoint is a flexible and easy to use platform to store inspection data, electronic documents and digital pictures.
6. During year one of the contract ACEPD staff spent an average of 8.3 hours per inspection; during year two the average was 10.1 hours per inspection. During year one the split between field time and office time was 49/51; during year two the split was 78/22. This significant difference is probably due to the following factors:
 - Considerable office time was spent during year one evaluating and becoming familiar with the FDEP inspection forms and setting up the program
 - Year two inclusion of CAV follow-up inspections, which require additional field time but considerable less office time.