

Florida Department of Environmental Protection



“How To Comply Workshop” in a Can

April 17, 2013





Purpose of HTC Workshops

- A platform to provide information to facilities on how to comply with RCRA regulations
- Provides an open discussion platform
- Allows facility personnel to ask questions without fear of inciting an inspection
- Provide compliance assistance to several facilities at once





Partnerships

- Partner with County SQG program
- Partner with LEPC Program
 - They usually have Hazmat Awareness Week workshops that they schedule on the same day
- They can usually handle mail-outs or emails of flyers
- They also help with location and A/V aids
- Some may help with refreshments



Get The Word Out

- Determine the type of crowd you want to attract
 - Specific generators such as medical facilities, automotive industry, manufacturing, research labs, etc.
 - Or more general such as county small businesses
- Work with county inspectors to get the word out to the facilities
 - County inspectors often have a closer relationship with facility personnel
 - Able to procure a location for the workshop
 - Try not to pick a date that is close to a holiday
- Work with businesses or associations to get the word out
- DEP Press releases are also an option



Workshop Day Planning

- Try to pick a day in the middle of the week
- AM or PM times seem to work best
- Evening workshops do not usually have large attendance – but you can try one and see how it goes
- Have Workshops throughout your District – try to have attendees drive as little as possible
- We are trying to have them in February/March and then in Oct/Nov



Preparation

- Create canned generic ppt presentations that can be used over and over again for a variety of business types
- NED ppt presentations can be found here:
<http://www.dep.state.fl.us/northeast/waste/hw.htm>
- Create a flyer
- Create a sign in sheet
- Create an agenda – 1.5 or 2 hour workshops
- Create an evaluation form



Example Flyer



How To Comply with Hazardous Waste and Used Oil Regulations

FREE
Workshops

The North Central Florida Regional Planning Council is conducting a series of **FREE** workshops to help businesses and governmental agencies comply with hazardous waste and used oil storage and disposal regulations.

This workshop will cover topics that apply to most types of businesses that generate potentially hazardous waste. Learn useful information on how to manage your hazardous waste in a cost-effective and legal manner. Common regulated wastes include: used oil and filters, anti-freeze, solvents, rags, paint wastes, lead-acid batteries, Dentist amalgams, fluorescent tubes and other Mercury containing light bulbs.

This compliance assistance outreach project is being presented in partnership with the Florida Department of Environmental Protection and the Alachua County Environmental Protection Department.

To register for one of these workshops or for additional information, please contact Dwayne Mundy at mundy@ncfrc.org or (352) 955-2200 ext. 108. Additional information, maps and directions will be available at <http://ncfrc.org/comply>.

February 11, 2013
Monday, 1:30 – 4:00 p.m.
Florida Gateway College,
Wilson S. Rivers Library
149 SE College Place
Lake City, FL 32025

February 12, 2013
Tuesday, 1:30 – 4:00 p.m.
Gilchrist County Emergency
Operations Center, 3250 North
US Highway 129, Bell, FL 32619

February 13, 2013
Wednesday, 1:30 – 4:00 p.m.
Suwannee River Water
Management District, 9225 CR
49, Live Oak FL 32060

February 14, 2013
Thursday, 9:30 – 11:45 a.m.
Gainesville Regional Utilities
Eastside Operations Center,
4747 North Main Street,
Gainesville, 32609

Note: These are being held in conjunction with “**Improving Chemical Safety**” Seminars being held at the same locations.



8/13/2013



Example Agenda

How To Comply Workshop

Date

30 – 2:15	Hazardous Waste Identification	Inspector
15 – 3:00	CESQG/SQG Requirements	Inspector
00 – 3:15	Break	
15 – 3:45	Used Oil and Used Oil Filter Requirements	Inspector
45 – 4:00	Universal Waste Requirements	Inspector



Example Evaluation Form

NED Hazardous Waste How To Comply Workshop Evaluation Form

Date

Please rate the following:

Strongly Disagree -----> Strongly Agree

- | | | | | | |
|--|---|---|---|---|---|
| 1. I will use course skills/information on the job | 1 | 2 | 3 | 4 | 5 |
| 2. The workshop was relevant to your business/needs | 1 | 2 | 3 | 4 | 5 |
| 3. The number of topics discussed was adequate | 1 | 2 | 3 | 4 | 5 |
| 4. Overall length of workshop was acceptable | 1 | 2 | 3 | 4 | 5 |
| 5. I would recommend the workshop to others | 1 | 2 | 3 | 4 | 5 |
| 6. The instructors responded well to questions | 1 | 2 | 3 | 4 | 5 |
| 7. Discussion was kept on track | 1 | 2 | 3 | 4 | 5 |
| 8. Instructors maintained group interest | 1 | 2 | 3 | 4 | 5 |
| 9. Instructors invited participants questions and opinions | 1 | 2 | 3 | 4 | 5 |
| 10. Instructors clearly communicated skills taught | 1 | 2 | 3 | 4 | 5 |

Please give your opinions on the following questions:

11. Top three most useful and informative topics:
-
-
-
12. What did not meet your expectations about the workshop?
-
-
-
13. Additional comments/suggestions/constructive feedback:

Preparation

- Facilities appreciate handouts and packets
 - Stuffed SQG books
 - Stencils and labels (free stuff is always fun!)
 - Industry-specific books - drycleaner pamphlets, pharmacy pamphlets, automotive pamphlets, etc.
 - Lots of business cards





Stuffed SQG Books

- HW Determination Fact Sheet
- NED Handout with quick summary and contact info for all NED inspectors
- SQG sample documents
 - HW container inspection log
 - Arrangements with local authorities letter
 - Modified Contingency Plan sample
- Summary of CESQG/SQG regs.



Hazardous Waste Determination Cheat Sheet

HAZARDOUS WASTE DETERMINATIONS

What is a solid waste? A solid waste is any solid, semisolid, liquid, or contained gaseous material that is discarded. Obviously something that is thrown into a dumpster is a solid waste. However, material that is dumped onto the ground, abandoned, stored, recycled or treated in lieu of being disposed of may also be a solid waste. Once something has been determined to be a solid waste, it must then be checked to see if it is a hazardous waste. Tools that can be used include product labels, Material Safety Data Sheets (MSDSs) and lab test results. A proper hazardous waste determination is a two step process. Both steps must be performed, and all appropriate waste codes must be applied to the waste stream.

STEP 1: IS THE WASTE A LISTED WASTE?

A solid waste is a hazardous waste if it is **listed** as such on any of the EPA hazardous waste lists located in 40 CFR 261 Subpart D (F, K, U, and P listed wastes)

1. **Nonspecific sources – F001 to F039 [40 CFR 261.31]** These are hazardous wastes produced by general industry, manufacturing, and maintenance operations

F001: Spent halogenated solvents used in degreasing: Tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a **total of ten percent or more (by volume)** of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. Examples: solvent degreasers, vapor degreasers

F002: Spent halogenated solvents: Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane; all spent solvent mixtures/blends containing, before use, a **total of ten percent or more (by volume)** of one or more of the above halogenated solvents or those listed in F001, F004, or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. Examples: dry cleaning solvents, brake cleaners, paint removers

F003: Spent non-halogenated solvents: Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/blends containing, before use, **only the above spent non-halogenated solvents; and all spent solvent mixtures/blends** containing, before use, one or more of the above non-halogenated solvents, and, a **total of ten percent or more (by volume)** of one or more of those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. Examples: paint thinners, lacquer thinners, alcohol cleaners

F004: Spent non-halogenated solvents: Cresols and cresylic acid, and nitrobenzene; all spent solvent mixtures/blends containing, before use, a **total of ten percent or more (by volume)** of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. Examples: Carburetor dip cleaner (cresylic acid)

F005: Spent non-halogenated solvents: Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a **total of ten percent or more (by volume)** of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. Examples: Lacquer thinners

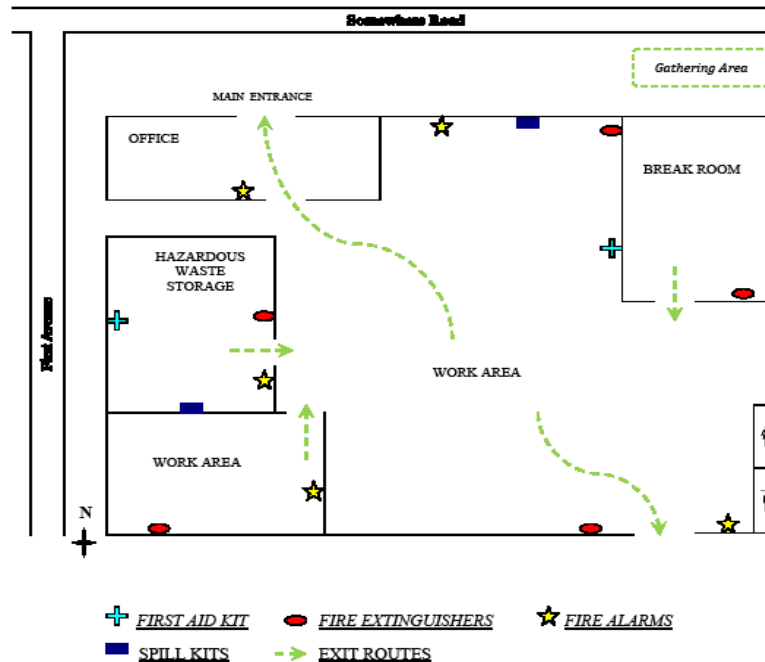
F006 to F039: Other non-specific wastes. Examples: F006 electroplating sludge, F007 spent cyanide plating baths



Mod. Cont. Plan Example

My Company Inc.
191 Somewhere Road
Otherville, Florida 32111

Emergency Coordinator: _____ (904) 999-9999
Fire Department: (904) 999-9999
CHEMTREC: (800) 424-9300
Police Department: (904) 999-9999
Emergency Response: (904) 999-9999
Hospital: _____ (904) 999-9999





Certificates

- Generate Certificates of Attendance in advance
- Sign and date the certificates in advance
- Have an assistant add attendees names during the workshop so that they can take them the same day
- Attendees should stay for the entire presentation to get a certificate



Certificate Example

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northeast District Hazardous Waste Section



This certifies that

attended the “How to Comply Workshop for Conditionally Exempt and
Small Quantity Generators of Hazardous Waste”

Location _____

Date _____

Pamela Fellabaum

Pamela Fellabaum, CHMM
Instructor



Workshop Day

- Arrive early to set up equipment and display of pamphlets, labels, etc.
- Wear a DEP shirt



Workshop Day

- Place agenda and a stuffed SQG book at each seat – especially near the front
- Place labels, stencils and industry-specific books in a table in the back
- Have each attendee sign in



Workshop Day

- Allow attendees to break at least once if it is a 2-hr session
 - You can't pay attention if you are uncomfortable or restless
- Don't read from the screen
 - Be comfortable with the presentation and speak directly to the crowd
 - Use the screen to keep you on track
 - Remember, they are there to hear what you have to say, so try not to be nervous





Workshop Day

- Introduce all of the DEP staff that are present
- Thank the audience for coming and let them know about DEP's Compliance Assistance Initiatives
- Take photos of the back of attendee's head so you don't need a release to use photos in Press Releases or Inside DEP articles
- Have newer inspectors attend for training purposes and try to encourage other inspectors to "teach" a session. Our newer inspectors teach the Used Oil and Universal Waste Section while the more senior inspectors teach the HW ID Section



Workshop Day

- Schedule a Q&A session
 - This is also a good time to see what other types of training facilities may want
 - Also, facilities like to ask the “regulator” directly
- Request that attendees fill out an evaluation form
 - Ask them to leave comments or questions
- Allow time after Workshop to mingle with attendees
 - Great time for attendees to ask questions they may not want to ask in front of a crowd
 - This helps to build a positive working relationship with facilities



Follow Up

- Review evaluation forms
 - Look for ways to improve future workshops
 - Check for questions
- Follow up with facilities
 - If attendees requested information, email or snail mail information as soon as possible
- Don't forget to write up EOG items, Inside DEP articles, or Press Releases – we use the figure of \$115 per person in cost savings for the business



Questions?