

The Small Business Resource

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Small Business Assistance Office (SBAO) Update

The Small Business Assistance Office (SBAO) has seen a steady increase in the number of incoming phone calls, helping about 130 small businesses to date. In addition, the office has completed several on-site compliance assessments and has held four environmental compliance seminars for small business owners. Types of businesses assisted have included:

- auto repair shops;
- construction contractors;
- dry cleaners;
- furniture refinishers;
- laundries;
- plastics manufacturers;
- printers;
- air conditioning service repair companies;
- a micro brewery;
- a die manufacturer; and
- powerwashing companies.

The SBAO has finalized written confidentiality procedures for its operation. In an accompanying letter of support, Ohio EPA Director Donald Schregardus, states, "We know that people may not feel comfortable about contacting us with questions about environmental regulations. To ease that concern, we have developed a confidentiality procedure". He also states, "The success of the program will depend upon a fundamental element of trust between the Agency and the small business community. Therefore, it is

my full expectation that the Small Business Assistance Office staff will work with its customers according to the procedure." If you would like to obtain a copy of the letter from Director Schregardus and the confidentiality procedure, please contact our office.

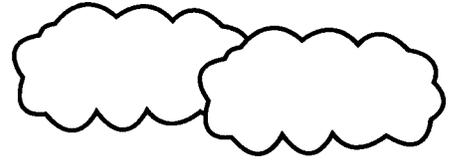
The office has formed an advisory committee of small business/industry representatives and small business association executives. The opinions of the advisory committee will help the SBAO identify and respond to the compliance assistance needs of small businesses. The next issue of this newsletter will highlight the advisory committee members and activities.

The office also continues to expand its technical resource library, making guidance documents, fact sheets and permit application forms available to small businesses.

This issue of The Small Business Resource is the second for the SBAO. We hope that small business owners find our newsletter to be an informative resource on environmental compliance issues. If you have any comments or suggestions, please feel free to share them with us at (614) 728-8573 or 1-800-329-7518. ☺

Air, Water, and Waste Issues

On-Site Environmental Compliance Assessments



Free and confidential on-site compliance assessments are one of the many services the SBAO offers to small business owners. To help small businesses know how to prepare for and what can be expected during a site visit, this article responds to some frequently asked questions.

Why should I have an on-site compliance assessment?

The purpose of an on-site compliance assessment is to help small businesses understand the operating requirements, permitting and other paperwork procedures that must be followed under our state's environmental rules. Recommendations provided by SBAO staff will give business owners a better understanding of how to continue operating their business to maintain compliance with the regulations.

Small business owners that have participated in the on-site visits often have had little or no experience with Ohio EPA. These businesses usually need help with environmental regulations, including completing permit application forms. Small businesses that have already participated in the program have said that they were glad they contacted the SBAO and received assistance.

The SBAO staff conducts the compliance assistance visits under the program's confidentiality procedures. This means that information gathered during the on-site visit will not be shared with agency inspection or enforcement staff. Additionally, there is no charge to the company for the on-site visit.

What happens during an assessment?

The on-site assessment is called a multimedia evaluation because it covers EPA's air, waste and water regulations. To provide a business with

a comprehensive evaluation, two technical specialists may work with the company during the compliance assistance visit.

The assessment process includes 1) an opening meeting 2) a facility walk-through, 3) a closing meeting, and 4) a written summary. Each part of the assessment is discussed in further detail below.

1) Opening Meeting

When arriving on site, the SBAO staff will meet with the business owner. To determine what regulations apply to the company, the SBAO staff will want information about the company's processes or services. Additionally, the SBAO staff will review company records that relate to environmental regulations (ex., Material Safety Data Sheets, manifests, inspection logs, reports and permit applications). Typical questions that might be asked during the opening meeting include:

- What raw materials are used in the process? What wastes are generated? How are wastes being handled on-site (tanks, containers, etc.)? How is the company disposing of wastes?
- Does the company have process units that might release air contaminants? (ex. spray booth, grinding areas)
- Is the company on city water and sewer? Does the company discharge any type of wastewater other than sanitary into the sewer?
- What kind of permits does the company have for air, waste, and water discharges?
- What environmental compliance records are being kept at the company (manifests, annual reports, inspection logs, etc.)?

2) Facility walk-through

After the opening meeting, SBAO staff will complete a facility walk-

through with the company representative(s). During the walk-through, SBAO staff will observe the process and environmental management practices.

3) Closing meeting

During the closing meeting SBAO staff will summarize the results of the visit and outline the measures needed by the company to maintain or achieve compliance.

4) Written Summary

A letter explaining the results of the compliance assistance visit and recommendations will be mailed to the company following the on-site visit. Technical guidance documents or permitting applications may be included along with the summary.

Although business owners will need to correct problems, the goal is to help businesses through technical assistance, not through penalties.

What are the benefits in participating in the program?

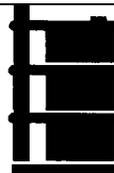
Benefits to receiving a compliance assistance visit and in working with the SBAO on environmental issues include:

- Help to protect worker health and safety
- Reduce future environmental liability and potential for non-compliance penalties
- Be better prepared for future Ohio EPA inspections that may occur at the company
- Identify ways to save money and increase efficiency through pollution prevention
- Preserve the environment for future generations

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Waste Management Issues

An Orphan Chemical Recycling Program



Remember the old phrase "what is trash to one person is a treasure to another?" This could be the motto of Bowling Green State University's (BGSU) Orphan Chemical Recycling Program. The program was set up in 1991 through the Department of Environmental Health and Safety to help the university reduce the generation of laboratory wastes. Recognizing that it was common for lab chemicals to remain on shelves, under hoods and in other storage areas, the program focused on identifying and transferring these unwanted but still usable ("orphan") chemicals between university departments. Within the first year, about 700 pounds of solid materials and 50 gallons of liquids were transferred between departments for reuse.

In the fall of 1992, BGSU expanded the program to address orphan chemicals at junior high, senior high and technical schools in Wood County. Since 1993, the orphan chemical recycling program has transferred approximately 3,000 pounds of solids and 900 gallons of Liquid. To date, 42 facilities have participated in the program and it is now available to academic and nonacademic facilities, including small businesses. The cost savings associated with reusing chemicals (versus disposal) have been estimated between \$265,000 and \$350,000.

The program's coordinator helps facilitate the transfer of usable chemicals from the party wanting to get rid of the material to a party interested in using the material. Information that may be requested as part of this process includes:

- chemical identification
- number of containers and/or total quantity of material
- the manufacturer and chemical grade
- status of the containers (i.e. have they been opened or repacked)

A list of available chemicals is compiled and distributed to program participants (with quarterly updates). This List also can be accessed on the internet at the following URL identification: gopher:/gopher.bgsu.edu/1/Departments/ehs. All orphan materials remain at the originating institution/facility until they are claimed or otherwise managed. The party wishing to obtain the orphan chemical is responsible for initiating the transfer and transportation must meet applicable Department of Transportation (DOT) requirements. A Material Safety Data Sheet (MSDS) is offered to the party receiving the orphan chemical shipment. Once the transaction has taken place, the program coordinator removes the item from the list.

Since opening in March 1996, Ohio EPA's Small Business Assistance Office has received a few calls from small business owners who have purchased property where chemicals have been left on-site. And, in these cases, the office has been successful in referring businesses to BGSU's Orphan Chemical Program, where usable materials have been transferred to other locations for reuse.

The Orphan Chemical Program is NOT a hazardous waste disposal program for small businesses. However, it can be a valuable resource for businesses trying to find alternatives to disposing of chemicals that can be used by another business. If you have an interest in participating in the program or would like more information, contact Dave Heinlen, safety and health coordinator, Bowling Green State University, at (419) 372-2173.

There is no fee to participate in the Orphan Chemical Program. The BGSU program is one of several waste exchange programs. There are programs available for larger quantities of materials. For additional information and contacts for these programs, contact the SBAO at 1-800-329-7518 or (614) 7288573.9

Ohio CESQG Rules

Conditionally Exempt Small Quantity Generators (CESQGs) are those facilities which generate less than 100 kilograms or 25 gallons of hazardous waste in any calendar month. In Ohio, the rules regulating CESQGs are found in the Ohio Administrative Code (OAC) Rule 3745-51-05. There are two main requirements CESQGs in Ohio must follow. CESQGs are required to evaluate any waste they generate to determine whether it is a hazardous waste and they must deliver their hazardous wastes to a permitted hazardous waste treatment, storage, and disposal facility for management. There is no time limit for how long a CESQG may accumulate hazardous waste; however, once a CESQG has accumulated more than 1000 kilograms of hazardous waste or one quart of acutely hazardous waste, the facility is considered a Small Quantity Generator (SQG) and must remove the waste off-site within 180 days. SQG regulations are found in OAC Chapter 374552.

While Ohio's environmental regulations are typically equivalent to U.S. EPA's environmental regulations, CESQG rules are one area where they differ. U.S. EPA's CESQG regulations are found in Title 40 of the Code of Federal Regulations (40 CFR) in Part 261.5. Part 261.5 (f)(3)(iv) and 261.5 (g)(3)(iv). They indicate that it is permissible for a CESQG to dispose of hazardous waste at a facility permitted, licensed, or registered by a State to manage municipal or industrial solid waste. The rules in place in Ohio regulating CESQGs differ, as they do not permit the disposal of hazardous waste in a municipal or industrial solid waste facility. While a CESQG may transport its hazardous waste if they desire, the waste must be disposed of in a permitted hazardous waste facility.

For more information on regulations for CESQGs, contact the Technical Support Unit in the Division of Hazardous Waste Management at (614) 644 2956.

A special thank you to the Division of Hazardous Waste Management for submitting this article.

Water Issues

Protecting Your Community's Water Supply



Where does water come from before it gets to the tap?

Most people don't think about where the water they use comes from. They just turn on the tap and take it for granted that it will always be there when they need it. What many people don't realize is that their actions as businesses and home owners can affect the quality and cost of their community's water supply.

Where does your community get its water?

Communities obtain their water from either a surface water supply (lake, river or reservoir) or a ground water supply (aquifer). Ground water is the cleanest, most reliable and often the cheapest source of water for a community because it requires less treatment than surface water. If you don't know whether your community is getting its water from a surface or ground water source, you can contact your local public water supplier or Ohio EPA.

How many people depend on ground water in Ohio?

In Ohio about 40 percent of the population depends on ground water for drinking and household use. Almost 75 percent of the 1,600 community water systems rely on ground water for all or part of their water supply. Approximately 700,000 people who live in rural areas depend on private wells for their water supply.

One large community that relies on ground water is the City of Dayton, which serves 400,000 customers from wells that produce an average of 85 million gallons of water per day. The importance of protecting their water supply was highlighted in 1987 when a fire destroyed a paint warehouse located in their wellfield. The event served as a catalyst for the community

to educate citizens and businesses about the importance of protecting their ground water resource. Dayton now has one of the most advanced ground water protection programs in the country.

Is contamination of ground water and surface water really a problem in Ohio?

Several communities in Ohio have experienced serious ground water contamination, forcing some to spend over \$1 million for installing treatment systems to clean up contaminants.

Surface water supplies can also face potential contamination. In 1977, a chemical spill resulted in tetrachloride being released to the Ohio River. In January 1988, a ruptured storage tank resulted in the release of one million gallons of fuel oil into the Monongahela River, which flows into the Ohio River. A large industrial fire in 1994 resulted in the detection of ethylene dibromide in the Ohio River. Because of such releases, extensive monitoring and communication stations have been set up along the Ohio River to provide communities with advance notice of spills that might contaminate their water supplies.

What Ohio EPA programs exist to protect our water supplies?

Ohio EPA has programs to assist communities in protecting their water supply sources from contamination. These include the Wellhead Protection Program (for ground water sources) and the Watershed Management Program (for surface water sources). Both programs use similar approaches to protect water sources. The basic steps include helping communities to:

- 1) identify the area where their water supply originates;
- 2) identify activities in that area that

may potentially contaminate the water supply; and

- 3) develop management plans to prevent contamination of the water source.

What are some activities that may have an impact on water quality?

Businesses, including small operations, have the potential to contaminate a water source if wastes or chemicals are improperly managed on-site. Examples of activities that can contribute to ground water or surface water contamination include:

- dumping wastes (like solvent, oils, cleaning agents) on the ground
- putting waste in an unlined pond or pit or in a waste pile
- failure to clean up spills and leaks of chemicals (transfer, unloading storage areas)
- putting solvent contaminated rags or filters outside on the ground to dry out
- putting wastes down drainage pipes or into on-site sewer systems (septic tanks, leach beds)

What can a small business do to help protect its community's source of water?

- 1) Find out where your community obtains its water supply.
- 2) Find out if your community has initiated a "source water" protection program. Get involved in one of their committees. If your community has not initiated a program, contact Ohio EPA to get ideas on how to start one.
- 3) Conduct an assessment of the activities at your company that may

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New Rules Update

Cessation of Regulated Operations (CRO)

These new rules were effective July 1, 1996. A company that has handled certain chemicals must notify emergency authorities (Ohio EPA, fire department, local emergency response commission) if it is shutting down operations. Additionally, the company must provide a certification that hazardous chemicals have been removed from the property. A fact sheet, complete copy of the rules and forms can be obtained by contacting: David Jancuk, CRO state coordinator at (614)728-5257 in the Division of Emergency and Remedial Response.

Interested Parties List Development

If you want to be updated on new or revised hazardous waste rules, you can ask to be placed on the Division of Hazardous Waste Management's "interested parties list." Those on the list can receive specific updates (e.g., used oil rules, new waste code listings) or can receive notification of all the hazardous waste rulemaking activity. For more information, contact Kit Arthur, Division of Hazardous Management, at (614) 644-3174.

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How do I request an on-site compliance assessment?

A small business owner can call the SBAO at 1-800-329-7518 or 614-728-8573 to get more information about the process or to request a compliance assessment.

Small Business Resources

Office of Pollution Prevention

The Office of Pollution Prevention (OPP) at Ohio EPA offers non-regulatory and free technical services to small businesses. A simple definition of pollution prevention is an effort to reduce the use of hazardous chemicals or reduce the amount of waste generated from a process. There are many pollution prevention steps that even a small company can take. Some examples include:

- finding less hazardous substitutes for raw materials;
- making process or equipment changes to increase efficiency;
- developing regular maintenance programs; and
- capturing materials for reuse or reprocessing.

These activities can save a company money and help make environmental compliance easier. Ohio EPA's Office of Pollution Prevention (OPP) offers free, technical services to small businesses to help them identify ways to minimize wastes. OPP also has a low interest program available to help companies finance pollution prevention projects. For more information about the Office of Pollution Prevention, call Anthony Sasson, OPP, (614) 644-3469.

Remember that your contact with the SBAO will be confidential. If you call the SBAO with additional questions and decide that you are not interested in receiving on-site help, your inquiry will not be turned over to inspection or enforcement staff. ♻️

Finance Corner

Bureau of Workers' Compensation Offers Cash to Improve Workplace Safety

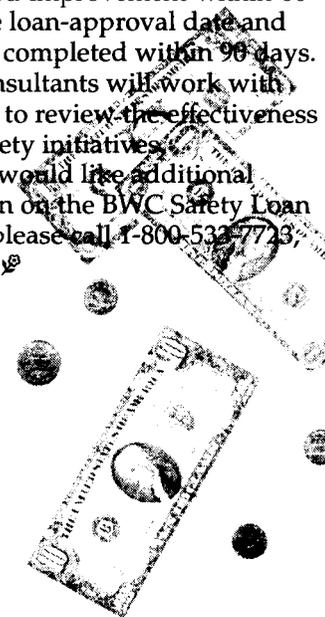
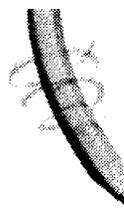
The Ohio Bureau of Workers' Compensation (BWC) is giving Ohio businesses the opportunity to apply for a loan as long as they use the money to make their work place safer. The Occupational Safety Loan Program by BWC provides low-interest loans to any Ohio employer to improve, install or erect safety equipment that reduces hazards in the workplace.

The Safety Loan Program is available to any Ohio employer who pays into the workers' compensation system. Employers can borrow \$5,000 to \$50,000 at an interest rate of two percentage points below the prime. Businesses must demonstrate that the investment will reduce hazards and promote workplace safety, while showing the ability to repay the loan.

Examples of purchases businesses may make using the Safety Loan Program include protective eye-wear, material-handling equipment, machine guards and ergonomically designed tools and fixtures.

Companies receiving an occupational safety loan must begin making the specified improvement within 30 days of the loan-approval date and have them completed within 90 days. Bureau consultants will work with businesses to review the effectiveness of their safety initiatives.

If you would like additional information on the BWC Safety Loan Program, please call 1-800-532-7723; ext. 60386. ♻️



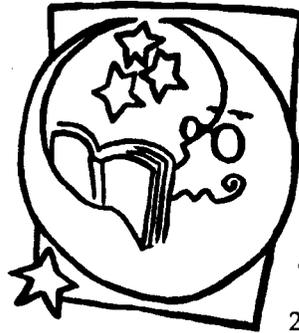
New Publications

☞ U.S. EPA recently released "Understanding the Hazardous Waste Rules: A Handbook for Small Businesses -1996 Update," EPA530-K-95-001, June 1996. This publication provides an overview of the hazardous waste generator regulations for small businesses.

☞ Ohio EPA's "Environmental Guide for Ohio Dry Cleaners," Division of Hazardous Waste Management, April 1996, is now available. This document provides an overview of the environmental regulations that apply to dry cleaners. It also outlines some recycling and waste minimization options for dry cleaners.

☞ Ohio EPA's Office of Pollution Prevention has two new fact sheets available:

1) "Acetone Regulations and Pollution Prevention: What You Should Know."



This fact sheet outlines the regulations and guidelines affecting acetone.

2) "Automotive Repair Facilities" outlines hazardous waste management requirements and pollution prevention options for automotive repair facilities.

☞ Ohio EPA's "Agenda '96" briefly summarizes the major program, policy and legislative initiatives underway at Ohio EPA, along with a contact name to call for additional information.

Contact Helen Sedoris, SBAO at (614) 728-8573 or 1-800-329-7518, to obtain a free copy of these publications. ✉

Water Issues continued from page 4

have the potential to contaminate the water supply and make necessary corrections to prevent contamination. Assessing your activities and taking measures to prevent contamination before it occurs is more cost effective than treating contamination. For additional information about source water protection programs, contact:

Wellhead Protection, Division of Drinking and Ground Waters, Mike Baker (614) 644-2752.

Watersheds Program Manager, Division of Surface Water, Gail Hesse (614) 644-2856.9

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