SMALL BUSINESS ASSISTANCE

Alaska Department of Environmental Conservation

Helping the Small Business Owner

Special Interest Articles:

- Changes to the Small Business Assistance Program.
- Commercial and Industrial Waste Incineration

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Changes to the Small Business Assistance Program

Alaska's Department of Environmental Conservation has undergone some important changes. The statewide public service division has been integrated into DEC program activities. This consolidation has moved staff positions from pollution prevention and compliance assistance into program work. The work that these two programs did to assist businesses is now found in the Small Business Assistance Program (SBA). The SBA can assist you in obtaining a permit or with permitting issues. The SBA can also provide information about how to reduce pollution and save money in the process. These changes will soon be seen in the department's web pages. Keep a watch on www.state.ak.us/dec for updated information. The SBA will be revising its web presence to provide information about the program and selected pollution prevention topics. There will also be links to EPA and industry support groups. With limited man power the internet will become more important in exchanging information about regulations and permit assistance. *Continued on Page 5*

Commercial and Industrial Waste Incineration

The Environmental Protection Agency (EPA) has issued a Federal plan for existing commercial and industrial solid waste incinerators (CISWI) that were built on or before November 30, 1999. The Federal plan is a set of requirements that implements EPA's CISWI emission guidelines (EG), which were promulgated on December 1, 2000.

The Federal plan will implement the emission guidelines for CISWI units located in States or Tribal areas that have not submitted an acceptable implementation plan to the EPA. The Federal plan will apply until individual States or Tribes have approved plans of their own in effect. For the majority of incinerators located in Indian Country and in U.S. territories, the Federal plan will be the sole authority compelling those sources to meet the final compliance deadline for required emission reductions.

The CISWI Federal plan applies to incinerators burning non-hazardous solid waste, such as rejected products that fail to meet production quality constraints, industrial sludges, packaging and shipping materials, wood wastes, construction and demolition materials, and other types of commercial and industrial waste service.

FEDERAL PLAN FOR EXISTING COMMERCIAL AND INDUSTRIAL SOLID WASTE INCINERATORS

"The Federal plan contains requirements for source and emission inventories, emission limits, testing, monitoring, and reporting requirements, as well as compliance schedules that include milestones for progress."

EPA promulgated guidelines to reduce air emissions from CISWI units on December 1, 2000. One of the requirements is for States to create an Implement plan or adopt the federal plan. The State of Alaska has adopted the federal plan as it's preferred action.

The Federal plan enforces emission limits and other requirements for CISWI units in Alaska.

The Federal plan contains requirements for source and emission inventories, emission limits, testing, monitoring, and reporting requirements, as well as compliance schedules that include milestones for progress.

Implementation of this plan will significantly reduce air emissions from incinerators. Key emissions reductions will include dioxin/furans by 65 percent, mercury by 34 percent, and hydrogen chloride by 89 percent.

For further information about the CISWI Federal plan, contact Mr. David Painter of EPA's Office of Air Quality Planning and Standards at (919) 541-5515. For technical information, contact Fred Porter at EPA's Office of Air Quality Planning and Standards at (919) 541-5251.

EPA's Office of Air and Radiation's home page on the Internet contains a wide range of information on the air pollution programs including air toxics issues. The Office of Air and Radiation's home page address is: http://www.epa.gov/oar/.

Interested parties can download the CISWI Federal plan from EPA's web site under "recent actions" at the following address: *http://www.epa.gov/ttn/oarpg*. For other information regarding commercial and industrial solid waste incineration, visit EPA's web site at: *http://www.epa.gov/ttn/atw/129/ciwi/ciwipg.html*.

Reducing the Hospital Waste Incineration*

Medical waste incinerators have been at the top of the list of contributors of dioxin to the environment. Much of what is burned in incinerators are wastes from health care services.

Dioxin is the name given to a group of persistent, very toxic chemicals. The most toxic form of dioxin is 2,3,7,8-tetrachlorodibenzo-p-dioxin or TCDD. A number of chemicals have toxicity similar to TCDD - but are less potent - and are called "dioxin-like." Of the 75 possible chlorinated dibenzo-dioxins, seven have TCDD-like toxicity.

The health effects of dioxin are known from studying laboratory animals. Some effects have also been observed in accidentally exposed people. Dioxin is a potent cancer-causing agent. Dioxin causes reproductive and developmental effects in animals at very low doses. Dioxin exposure damages the immune systems, leading to the increased susceptibility to infectious disease. It can also disrupt the proper function of hormones which are chemical messengers that the body uses for growth and regulation.

Reducing the Hospital Waste Incineration Continued

Garbage and medical waste incinerators are the largest sources of dioxin identified by the EPA. PVC (polyvinyl chloride) plastic is a major source of chlorine in these wastes. Besides being emitted into the air, dioxins end up in the bottom ash and the fly ash captured by pollution control equipment in incinerators. Other combustion sources of dioxin include cement kilns, hazardous waste incinerators, metal smelters, wood burning and vehicles running on leaded gasoline.

Mercury Reduction

Practicing pollution prevention for mercury would include phasing out the use of mercury based technologies in the workplace. Start first with mercury items in carpeted areas, or mobile mercury products (more likely to tip over and break). Replace with non-mercury products such as digital thermometers, aneroid blood pressure monitoring devices or digital monitoring devices

Battery Waste Management

Initiate battery recovery programs in the workplace, to ensure that batteries are not discarded in the trash, down the drain, or in needle boxes or sharps containers. Batteries are used everywhere in health care. Every beeper, pump, flashlight, and many of our diagnostic devices are battery powered or have battery back-up. There are many types of batteries with different geometries and chemical composition, some more toxic than others. Some types of batteries include: alkaline, lead acid, nickel cadmium, mercury, lithium, dry cell and zinc air. Some types of batteries can be recycled. Others need to be disposed of as a hazardous waste. Collect batteries separately from other wastes. Contact your local solid waste authority and see if they can provide assistance with the proper disposal of batteries.

Fluorescent Tubes

Health care facilities frequently have fluorescent lighting fixtures. Each fluorescent tube has as much mercury as 400 or more batteries. Fluorescent tubes should be recovered for recycling or disposed of as a hazardous waste.

Biohazardous Waste: Toxicity Reduction

Red bags and needle disposal boxes used to collect infectious or biohazardous waste can be a source of cadmium, a heavy metal, when incinerated. Check to be sure that red bags and sharps containers used in the workplace are cadmium-free. Some companies use cadmium as a colorant/pigment enhancer in the manufacture of these products.

Reduce the amount of biohazardous waste in the workplace by carefully segregating wastes. Check biohazardous waste container placement. Be sure containers are not located in places where they are likely to be filled with non-infectious, non-biohazardous wastes. Items such as paper towels, product supply packaging, and other solid wastes should be discarded as trash, and not as biohazardous waste.

Find out where the biohazardous waste (red bags and needle boxes) are being disposed. Are they being incinerated or autoclaved? Are they placed in the dumpster in the parking lot?

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Small Business Help
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Reducing the Hospital Waste Incineration Continued

"Get involved in the process of acquiring products used in health care. Develop an environmental criteria for products being purchased."

There are many treatment technologies available for this type of waste, such as incineration, autoclaves, microwaving, and electro-thermal deactivation to name a few. Avoid incineration except for wastes which can only be treated by that technology

Disposal of Pharmaceutical Waste

Minimize pharmaceutical waste by only accepting quantities of medication samples from drug representatives that will be consumed. Encourage drug reps to "take back" expired or unused samples. If that strategy is not successful, discard the actual pharmaceutical product in a needle box or sharps container. Do not flush medications down the toilet, especially hormonal medications such as replacement therapy and birth control pills, or narcotics.

Purchasing for Pollution Prevention

Get involved in the process of acquiring products used in health care. Develop an environmental criterion for products being purchased. Evaluate the type of packaging that products come in: is it excessive, are the components recyclable? For example, seek out rechargeable batteries where appropriate. Specify cadmium-free red bags and needle boxes. Purchase battery operated thermometers and digital or aneroid blood pressure monitoring devices instead of mercury based products. Choose reusable cloth gowns and drapes when possible. Minimize the use of chlorinated plastics (They have been associated with creating dioxin when incinerated).

When purchasing waste disposal services seek companies that offer alternatives to incineration whenever possible and appropriate. Specify autoclaving or an alternate technology. This is especially important for disposal of wastes containing PVC (polyvinyl chloride), items such as IV bags, IV tubing, and blood bags.

* Excerpts from an article published at www.cghenvironmental.com/nursesrole.html

For more information see:
http://www.sustainablehospitals.org
http://www.noharm.org

What is a "qualified small business"?

Businesses that:

- are owned or operated by a person who employs 100 or fewer individuals
- does not emit 100 tons or more per year of carbon monoxide, nitrogen oxides, sulfur dioxide, or particulate matter and hazardous air pollutants (HAPs) and
- are a small business concern under the Federal Small Business Act

Small Business Assistance Links

EPA's Small Business Division serves as the small entities' port of entry to the Agency. This Division is EPA's focal point for small-business-related activities and programs. The Division is headed up by Ombudsman, Karen V. Brown. Information and business assistance links are available at www.epa.gov/sbo.

Congress enacted the Regulatory Flexibility Act (RFA) in September of 1980 to ensure EPA and other federal agencies considered a rule's impact on small businesses before promulgation. It also gives small entities a voice when EPA makes policy determinations in shaping its rules. In March of 1996, the Small Business Regulatory Enforcement Fairness Act (SBREFA) became law, amending and strengthening the RFA. SBREFA serves to foster a government environment that is more responsive to small business and other small entities. For additional information call SBA's the toll free line (888-REG-FAIR or 888-734-3247) or visit www.sba.gov/regfair.

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We're on the Web!
See us at:
www.state.ak.us/dec

Small Business Assistance Links

EPA's **Small Business Compliance Policy**, revised in the spring of 2000, and is intended to promote environmental compliance among small businesses by providing incentives for voluntary discovery, prompt disclosure and correction of violations. Under this policy, EPA will eliminate or reduce civil penalties provided the small business satisfies certain criteria. Additional information about the revised Policy is available from Ginger Gotliffe at 202-564-7072 or at www.es.epa.gov/oeca/smbusi.html.

The **Small Business Environmental Home Page** (www.smallbiz-enviroweb.org/compliance.html) provides access to additional compliance assistance tools including regulatory updates focused on small business, a general regulatory calendar, and links to state environmental agencies, SBAPs, and funding information, as well as to regulatory search sites. The Home Page contact is Audrey Zelanko (412-577-2649).

Stakeholder Involvement is highlighted through mechanisms and tools designed to increase the public's role in environmental decision-making and to make their involvement more meaningful. More information is available at www.epa.gov/stakeholders

Design for Environment (DFE) helps business incorporate environmental considerations in the design of products, processes, and technical management systems and examine cross-media impacts, energy and resource use, and the risks from unregulated hazardous chemicals. To learn more, call John Sparks at 202-260-1682 or access www.epa.gov/dfe.

Changes to the Small Business Program continued

The State of Alaska has developed a specialized program to help small businesses comply with environmental requirements. The primary purpose of this program is to assist qualified small businesses which are or will be subject to the requirements of the Federal 1990 Clean Air Act Amendments and Alaska Air Quality regulations. Our aim is to help businesses comply through education and technical assistance, not enforcement.