"Acme Widgets"

A case study referral to FDEP

Pinellas County

NAHMMA Southeast Chapter Conference
Jacksonville, Florida
June 10, 2025

Don Stillwaugh
Environmental Specialist 2
Business Waste Assessments Section
Pinellas County Solid Waste

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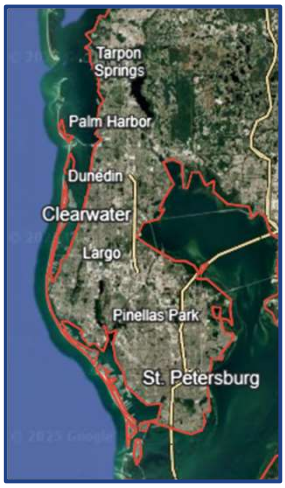
Introduction

Pinellas County



Data attribution

This map includes data from:
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Imagery from the dates:
2/14/2023

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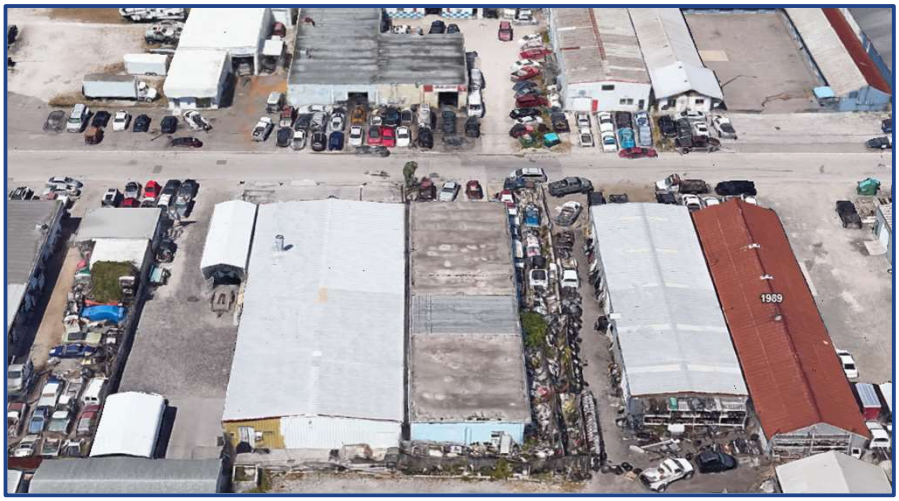
Introduction



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Imagery from the dates:
3/9/2014–2/23/2025

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Introduction

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3/9/2014–2/23/2025

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"Acme Widgets"

- Two buildings – one for manufacturing & one largely for storage
- Produce small parts (1/32" to 1") used to connect other parts together
- Largely from Stainless Steel, but brass and aluminum are also tooled

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Initial Visit – January 21, 2016

Photograph 1: Open shop area with many Swiss screw machines.

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Initial Visit – January 21, 2016

Photograph 2: Absorbent at base of one of the machines.

Photograph 4: Mineral spirits on left (red container in Photo 4) and rust preventive on right (blue).

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Initial Visit – January 21, 2016

Photograph 4: Sink, tumblers and dip washers.

Photograph 8: Finishing compound used in tumbler: pH of concentrate is 1.0 – 2.0 according to MSDS.

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Initial Visit – January 21, 2016

Photograph 6: Plumbing under sink leads to west wall.

Photograph 7: Plumbing from sink leads to this settling tank.

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Initial Visit – January 21, 2016

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Initial Visit – January 21, 2016

Photograph 9: Product dispensing area in adjacent building at .

Photograph 10: Empty drums and waste drums in adjacent building a Note open funnel behind white pail on one of two waste drums.

Photograph 11: Scrap metal storage in adjacent building at Note oily absorbent on floor.

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Initial Visit – January 21, 2016

Photograph 15: Spent lamp storage in adjacent building

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Initial Visit – January 21, 2016

Photograph 13: Washer and dryer in adjacent building at (on septic).

Photograph 14: Sand filter outside Southwest corner of building at

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Initial Visit – January 21, 2016

Hello Don,

I can confirm that is on the Sanitary Sewer as they are billed for both Water and Wastewater according to Customer Services records.

is only billed for Water service - NOT Sewer according to the same database.

Hope this was helpful. Have a good day. Be safe,

Industrial Pretreatment Coordinator
Public Utilities Department
Wastewater Environmental Technologies Division

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Initial Visit – January 21, 2016

	Waste Type	Storage Method	Disposal Method	Questionable Disposal
	UREH RAGS WITH OIL	OG OTHER GOOD	DT DISPOSAL TO SEPTIC TANK	Y
	UKEH ABSORBENTS CONTAMINATED W/OIL	OQ OTHER QUESTIONABLE	SF SOLID WASTE INCINERATOR (WTE)	Y
	LDEB FLUORESCENT LAMPS/DEVICES	OQ OTHER QUESTIONABLE	AN ACCUMULATION - NO MANAGEMENT PLAN	Y
	MBHR SLUDGES WITH HEAVY METALS	OG OTHER GOOD	SF SOLID WASTE INCINERATOR (WTE)	Y
	SMRA SPENT SOLVENTS (MIX/OTHER)	C5 40 OR MORE GALLON CONT...	NQ NON-HAZ MANAGEMENT (NOT TESTED-QUESTIONABLE	Y

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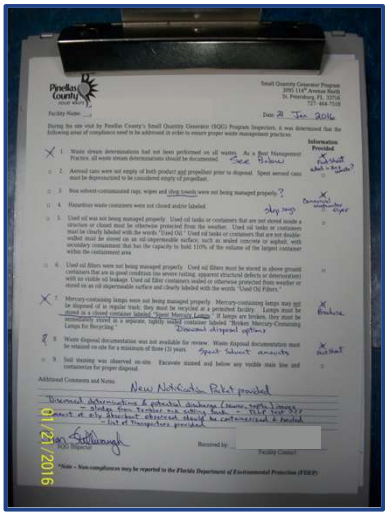
Initial Visit – January 21, 2016


Pinellas County

Small Quantity Generator Program
3095 114th Avenue North
St. Petersburg, FL 33716
727- 464-7158

Facility Name: ____ Date: 21 Jan 2016

During the site visit by Pinellas County's Small Quantity Generator (SQG) Program Inspectors, it was determined that the following areas of compliance need to be addressed in order to ensure proper waste management practices.

Information Provided

X 1. Waste stream determinations had not been performed on all wastes. As a Best Management Practice, all waste stream determinations should be documented. Oral Written X Both

2. Aerosol cans were not empty of both product and propellant prior to disposal. Spent aerosol cans must be depressurized to be considered empty of propellant.

3. Non-solvent-contaminated rags, wipes and shop towels were not being managed properly. ? X Commercial Laundry Service

4. Hazardous waste containers were not closed and/or labeled. Shop Supply

5. Used oil was not being managed properly. Used oil tanks or containers that are not stored inside a structure or closed must be adequately protected from the weather. Used oil tanks or containers must be clearly labeled with the words "Used Oil." Used oil tanks or containers that are not double-walled must be stored on an oil-impermeable surface, such as sealed concrete or asphalt, with secondary containment that has the capacity to hold 110% of the volume of the largest container within the containment area.

6. Used oil filters were not being managed properly. Used oil filters must be stored in above ground containers that are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. Used oil filter containers sealed or otherwise protected from weather or stored on an oil-impermeable surface and clearly labeled with the words "Used Oil Filters."

X 7. Mercury-containing lamps were not being managed properly. Mercury-containing lamps may not be disposed of in regular trash; they must be recycled at a permitted facility. Lamps must be stored in a closed container labeled "Spent Mercury Lamps." If lamps are broken, they must be immediately stored in a separate, tightly sealed container labeled "Broken Mercury-Containing Lamps for Recycling." Discussed disposal options X Brochure

? 8. Waste disposal documentation was not available for review. Waste disposal documentation must be retained on-site for a minimum of three (3) years. Spent Solvent manifests X Brochure

9. Soil staining was observed on-site. Excavate stained soil below any visible stain line and containerize for proper disposal.

Additional Comments and Notes: New Notification Packet provided
Discussed determinations & potential discharge (sewer, septic) issues - sludge from tumbler sink settling tank - TCLP Test ???
Amount of oily absorbent observed should be containerized & hauled - list of transporters provided

Inspector: [signature] Received by: Facility Contact

01/21/2016

*Note – Non-compliances may be reported to the Florida Department of Environmental Protection (FDEP)

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Additional Comments and Notes: New Notification Packet provided
Discussed determinations & potential discharge (sewer, septic) issues
- sludge from tumbler sink settling tank - TCLP Test ???
Amount of oily absorbent observed should be containerized & hauled
- list of transporters provided

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Post Visit – January 25, 2016

Stillwaugh, Donald M

From: Stillwaugh, Donald M
Sent: Monday, January 25, 2016 3:06 PM
To: @verizon.net'
Subject: SQG Follow-up
Attachments: Commercial Transporters 2015.pdf

Good Afternoon Mr. ,

It was a pleasure to meet you last Thursday and to get to learn a little about your business. I've done some research in order to tie up some loose ends and make a few recommendations.

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Initial Visit – January 21, 2016

3) Concerning the sludge which is periodically cleaned from the settling tank, as we discussed a waste determination should be performed prior to next disposal.
   a. You will want to choose a NELAC certified lab.
   b. You might consider first doing a "totals" screening and then if you get a "hit" for any of the RCRA metals, you would follow-up with a TCLP for that (those) specific metal(s) to determine if the amount is above or below regulatory limits.

4) The disposal of the waste solvent mixture which Heritage Crystal-Clean is hauling should be properly documented with dates and quantities hauled off the site. As we discussed, it is currently being handled as non-hazardous (according to your contract) and it is your responsibility to be certain of this fact. It is not the flash point (ignitability) which might make this waste hazardous so much as metal contamination.

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Initial Visit – January 21, 2016

If you have any further questions or need for further assistance, please don't hesitate to ask.

Best Regards,

Don

Donald Stillwaugh
Environmental Specialist 2
Small Quantity Generator Program
Pinellas County Department of Solid Waste
3095 114th Ave. N. St. Petersburg, FL 33716
Phone 464-7570
Fax (727) 464-7713
dstillwa@pinellascounty.org

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Interim…….2016 to 2024

Pinellas County SQG:

- Still building assessment roll
- Transforming into BWAS
- Expanding – new inspectors to train
- Rotating zipcodes for inspectors

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Recent Visit – February 16, 2024

"Operations much the same as observed on previous inspection"

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Recent Visit – February 16, 2024

"Operations much the same as observed on previous inspection"

22

Recent Visit – February 16, 2024

Non-Compliance		Information Provided
X	**Accurate Waste Stream Determinations** had not been performed on all wastes: Sludges - settling tank & other processes * *All waste stream determinations must be documented.*	X Lab Handout

X	**Mercury-Containing Lamp Management:** ☐ Mercury-containing lamps may not be disposed of in regular trash; they must be recycled at a permitted facility. ☒ Lamps must be stored in a closed container labeled "Universal Waste—Lamp(s)." ☐ Broken lamps must be immediately stored in a separate, tightly sealed container labeled "Broken Universal Waste – Lamp(s)." Large Accumulation - See WD16	X

Additional Comments and Notes:

* 8 RCRA metals Chromium is regulated at 5 MG/L or ppm
- Provided copy of 01/25/2016 E-mail discussing TCLP / Totals screening

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Re-Inspection – March 26, 2024

Date: 03/26/24 Initial Site Visit Date: 02/16/2024

	Corrected
Prior Compliance Issue: Storage & Accumulation of spent mercury-lamps **Comments:** on "to do list"	☐ Yes ☒ No
Prior Compliance Issue: HW Determinations on settling tank & machine sludge **Comments:** not yet	☐ Yes ☒ No

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Referral – April 12, 2024

Good morning

Acme Widgets is located at . They occupy two buildings with the one at on septic. I initially visited the facility in 2016 and found issues with universal waste storage & accumulation as well as issues with waste determinations. The steel they work with has a high chromium content. Upon a recent inspection in February of this year, I found the same issues existing (see attached Documents – please disregard Business Origin Date – glitch in our db). I gave them some more time, but upon reinspection nothing had been accomplished to mitigate these issues. I believe it will take your department to stimulate any response.

If you have any questions, please don't hesitate to reach out.

Regards,

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