



Jeb Bush
Governor

Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Colleen Castille
Secretary

May 2, 2006

SENT VIA E-MAIL
bdick@aiscn.com

Mr. Brian Dick
Vice-President Southeast Region
Atlantic Industrial Services
11234 Adobe Trail
Frisco, Texas 75034

OCD-HW/E-06-0102

Marion County – HW
Atlantic Industrial Services
Warning Letter OWL-HW-06-009

Dear Mr. Dick:

During an informal meeting on April 14, 2006, you provided the Department with Atlantic Industrial Services' response to Warning Letter OWL-HW-06-009. Your documentation indicates waste streams have been tested and did not exhibit a characteristic of hazardous waste. Also, information was provided that indicates the contingency plan was updated in 2005, but it was not forwarded to the appropriate agencies as required.

Based on the information provided, the Department is eliminating the alleged violation for failure to properly test sludge removed from the used oil processing operation. It is suggested that you request a modification to the permit specific condition Part III item 4.c.4. This condition appears to require the facility to test sludge removed from the processing system each time it is removed. Based on past test results, yearly testing of waste streams may be more appropriate. The violation for failure to update the contingency plan has been changed to a minor potential for harm and a minor extent of deviation. The penalty for this violation is \$430.00.

In order to settle this case, a Short Form Consent Order has been drafted for your review and, if the document is acceptable, signature. If the settlement document is not acceptable, please provide your comments in writing within 20 days of receipt of this letter.

If you have any questions please contact Lu Burson at lu.burson@dep.state.fl.us or John White at john.white@dep.state.fl.us or at (407) 893-3323.

Sincerely,

Vivian F. Garfein
Director, Central District

Lb/jw



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SENT VIA E-MAIL
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SHORT FORM CONSENT ORDER

Mr. Brian Dick
Vice-President Southeast Region
Atlantic Industrial Services
11234 Adobe Trail
Frisco, Texas 75034

OCD-HW/E-06-0102

SUBJECT: Proposed Settlement of Atlantic Industrial Services, Marion County
OGC File No.: 06-0986

Dear Mr. Dick:

The purpose of this letter is to complete the resolution of the matter previously identified by the Department in the Warning Letter dated March 13, 2006, a copy of which is attached. The corrective actions required to bring your facility into compliance have been performed. The Department finds that you are in violation of used oil permit 161967-HO-003 specific condition 2(b) or Part V, Preparedness and Prevention / Contingency Plan Requirements. In order to resolve the matters identified in the attached Warning Letter, you are assessed civil penalties in the amount of \$330.00 along with \$100.00 to reimburse the Department costs, for a total of \$430.00.

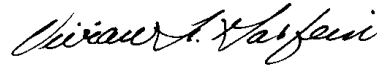
The civil penalties are apportioned as follows: \$330.00 for violation of used oil permit 161967-HO-003 specific condition 2(b) or Part V, Preparedness and Prevention / Contingency Plan Requirements and Title 40 CFR 279.52(b)(4).

The Department acknowledges that the payment of these civil penalties by you does not constitute an admission of liability. This payment must be made payable to the Department of Environmental Protection by cashier's check or money order and shall include the OGC File Number 06-0986 assigned above and the notation "Ecosystems Management and Restoration Trust Fund." Payment shall be sent to the Department of Environmental Protection, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803, within 30 days of your signing this letter.

Your signing this letter constitutes your acceptance of the Department's offer to resolve this matter on these terms. If you elect to sign this letter, please return it to the Department at the address indicated above. The Department will then countersign the letter and file it with the Clerk of the Department. When the signed letter is filed with the Clerk, the letter shall constitute final agency action of the Department which shall be enforceable pursuant to Sections 120.69 and 403.121, Florida Statutes.

If you do not sign and return this letter to the Department at the District address by May 16, 2006, the Department will assume that you are not interested in settling this matter on the above described terms, and will proceed accordingly. None of your rights or substantial interests are determined by this letter unless you sign it and it is filed with the Department Clerk.

Sincerely,



Vivian F. Garfein
Director, Central District

May 1, 2006
Date

FOR THE RESPONDENTS:

I, _____ on behalf of _____, **HEREBY ACCEPT
THE TERMS OF THE SETTLEMENT OFFER IDENTIFIED ABOVE.**

By: _____

Date: _____

.....
FOR DEPARTMENT USE ONLY

DONE AND ENTERED this _____ day of _____, 2006.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Director of District Management

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby Acknowledged.

Clerk

Date

Copies furnished to: Office of General Counsel
Tallahassee RCRA Program

NOTICE OF RIGHTS

Persons who are not parties to this Consent Order but whose substantial interests are affected by this Consent Order have a right, pursuant to Sections 120.569 and 120.57, Florida Statutes, to petition for an administrative hearing on it. The Petition must contain the information set forth below and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS-35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this notice. A copy of the Petition must also be mailed at the time of filing to the District Office named above at the address indicated. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes.

The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner; the Department's Consent Order identification number and the county in which the subject matter or activity is located; (b) A statement of how and when each petitioner received notice of the Consent Order; (c) A statement of how each petitioner's substantial interests are affected by the Consent Order; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Consent Order; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Consent Order; (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Consent Order.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject Consent Order have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Sections 120.569 and 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-106.205, Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.



Department of Environmental Protection

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Orlando, Florida 32803-3767

Collen Castille
Secretary

Certified Mail

7005 1160 0000 9348 7438

Scott Eddings, Plant Manager
Atlantic Industrial Services, Inc.
359 Cypress Road
Ocala, Florida 34472

WARNING LETTER
OWL-HW-E-06-009

Marion County-HW
Atlantic Industrial Services, Inc.
FLR000060301

Dear Mr. Eddings:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste compliance inspection was conducted at your facility on November 15, 2005. The inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes in order to determine the compliance status of your facility with Title 40 Code of Federal Regulations (CFR) Parts 260-268, and Part 279 adopted in the Florida Administrative Code and other Florida laws relating to hazardous waste and used oil.

During the inspection, Department personnel observed possible violations of Florida Statutes and Rules regarding solid and hazardous waste and used oil. These violations are set forth in "Potential Noncompliance Items and Corrective Actions" of the attached inspection report.

The activities observed during the Department's field inspection and any activity at your facilities that may be contributing to violations of the above described statutes and rules should be ceased immediately.

The Department has calculated penalties for the violations addressed above. The penalty work sheet is enclosed. The penalty amount was calculated in accordance with the U.S. EPA RCRA Civil Penalty Policy, dated June 2003, and the Department's Guidelines for Characterizing RCRA Violations. A copy of the documents is available upon request.

Please contact John White, Hazardous Waste Section, by telephone at (407) 893-3323 or by e-mail at john.white@floridadep.net within 10 days of receipt of this letter to schedule an informal conference concerning resolution of this matter. The Department is interested in reviewing any

facts you may have that will assist in determining whether any violations have occurred and whether any penalties are appropriate. You may bring anyone with you to the meeting that you feel could help resolve this matter.

This Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The Department looks forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,



Vivian F. Garfein
Director, Central District

3/13/06
Date

VFG/jk

Enclosures:
Inspection Report
Penalty Calculation Worksheet

cc: Mike Redig, FDEP, Tallahassee, michael.redig@floridadep.net
Laurie DiGaetano, EPA Region 4, digaetano.laurie@epa.gov
Debby Valin, FDEP, Pollution Prevention, Debby.Valin@floridadep.net



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HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Routine ☐ Complaint ☐ Follow-Up ☐ Permitting ☐ Pre-Arranged

FACILITY NAME Atlantic Industrial Services EPA ID # FLR000060301
STREET ADDRESS 359 Cypress Road, Ocala, Florida 34472
MAILING ADDRESS 359 Cypress Road, Ocala, Florida 34472
COUNTY Marion PHONE 352-687-0688 DATE 11/15/05 TIME 1200

NOTIFIED AS: ☐ N/A

- ☐ Non Handler
☒ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)
☐ Generator (>1000 kg/mo.)
☒ Transporter
☐ Transfer Facility
☐ Interim Status TSD Facility
☐ TSD Facility
Unit Type(s):
☐ Exempt Treatment Facility
☒ Used Oil: Processor, UOF Transporter

CURRENT STATUS:

- ☐ Non Handler
☒ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)
☐ Generator (>1000 kg/mo.)
☒ Transporter
☐ Transfer Facility
☐ Interim Status TSD Facility
☐ TSD Facility
Unit Type(s):
☐ Exempt Treatment Facility
☒ Used Oil: Processor, UOF Transporter

2. **APPLICABLE REGULATIONS:**

- | | | | |
|--|---|--------------------------------------|---|
| ☒ 40 CFR 261.5 | ☐ 40 CFR 262 | ☐ 40 CFR 263 | ☐ 40 CFR 264 |
| ☐ 40 CFR 265 | ☐ 40 CFR 266 | ☐ 40 CFR 268 | ☐ 40 CFR 273 |
| ☒ 40 CFR 279 | ☒ 62-710, FAC | ☐ 62-737, FAC | ☒ 62-730, FAC |

3. **RESPONSIBLE OFFICIAL(s):**

Scott Eddings, Plant Manager

4. **INSPECTION PARTICIPANTS:**

John White – FDEP Scott Eddings, Plant Manager, Atlantic Industrial Services
Edmond Burks - USEPA

5. **SIC Code:** 5172 – Petroleum Products

6. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

7. **LATITUDE/LONGITUDE:** 29° 04' 51" N / 81° 59' 28" W

8. **PERMITS:** 161967-HO-003 **ISSUED:** June 29, 2004 **EXPIRES:** April 27, 2007

9. Introduction

On November 15, 2005, John White, Florida Department of Environmental Protection, and Edmond Burks, U.S. Environmental Protection Agency, inspected Atlantic Industrial Services, Inc. (AIS) for compliance with state and federal hazardous waste and used oil regulations. Scott Eddings, Plant Manager for AIS, accompanied the inspectors.

Atlantic Industrial Services, Inc. is a used oil and material processing facility authorized under a Florida Department of Environmental Protection permit, number 161967-HO-003, to process used oil, non-hazardous used antifreeze contaminated with used oil, and used oil filters. The facility is also authorized to process solid wastes, such as sludges, residues, tank bottoms and used oil filters, as well as by-products and other oily wastes generated on site during used oil processing. For this purpose, AIS has a solidification pit where solid wastes are mixed with clay, and then sent to a non-hazardous waste landfill in Valdosta, GA.

The materials processing facility is authorized to consolidate and process non-hazardous petroleum-contaminated solid wastes and other solid wastes not constituting "used oil" subject to the conditions of the permit.

AIS began operations in 2000 on two combined parcels, totaling approximately 12.3 acres in size, at 359 Cypress Road, Ocala, Marion County, Florida (see Figure 1). Permit information submitted by AIS indicates that the site is a 5.88 acre parcel of land. The AIS corporate office is in Fort Lauderdale, Florida. There are currently 13 plant employees.

10. Inspection History

AIS was last inspected on May 3, 2004 just before issuance of the permit. The purpose of this inspection was to verify information contained in the permit application, including the layout of equipment at the facility and current processes performed on site. No violations were noted at this time.

AIS was inspected on September 25, 2002 and was not in compliance at that time. Violations noted included: 40 CFR 279.52(a)(1) – releases of used oil near the rail car unloading area; 40 CFR 279.22(c) – labeling of containers with the words "used oil"; and 40 CFR 279.44(a) – rebuttable presumption for used oil that contains greater than 1,000 parts per million of total halogens. The violations were resolved through a short form consent order executed on July 29, 2003. Penalties were assessed in the amount of \$2,100.00.

AIS was inspected on July 13, 2001 and was not in compliance at that time. Violations of the rebuttable presumption for used oil [40 CFR 279.44(a)] that contain greater than 1,000 parts per million total halogens were cited. The violations were resolved through a short form consent order executed on February 18, 2001. Penalties were assessed in the amount of \$2,250.00.

11. Process description

AIS comprises a main office, containing offices and laboratories, a two part process building that contains the used oil processing area, control room, and used oil filter and drum storage area, and a tank farm.

According to permit number 161967-HO-003, issued on June 29, 2004, AIS maintains forty-eight above-ground storage tanks ranging in size from 500 gallons to 30,000 gallons [Figure 9]. The tanks all sit within secondary containment. Twenty-nine of the tanks are used oil tanks and have a combined capacity of 709,460 gallons.

The used oil processing area and wastewater treatment system are situated within an enclosed building, constructed on a 6" reinforced, sealed concrete slab. The processing area is approximately 12,000 square feet.

The warehouse, which contains the used filter processing area and drum storage, is located within a 13,000 square foot building, constructed on an 8" reinforced, sealed concrete slab.

Drivers pick up loads of used oil, used oil filters, and oily wastewater from generator locations. Used oil is screened with a halogen sniffer prior to acceptance to ensure it is below 1,000 parts per million (ppm) total halogens. When the used oil tanker arrives at the facility, the used oil is screened again using a halogen testing kit. Oil containing a high percentage of water is separated from other used oil and wastewater. The used oil is processed by heating to drive off water and shaking to settle out solids. The oil is then tested to determine if it is on-specification, as identified in 40 CFR 279.11.

12. Narrative

Inspection

The south side of the used oil filter building is used for storage of empty containers and used oil filter drums that arrive from generator locations. There were 52 empty containers in the warehouse [Figure 2]. Empty containers and overpack containers are supplied to customers. There were 162 55-gallon drums of used oil filters and 34 200-gallon containers of used oil filters in the warehouse at the time of the inspection [Figure 3]. Used oil filter drums are emptied, uncrushed, into a 30-yd³ roll-off container, and shipped to US Foundry in Miami, Florida, for recycling. According to Mr. Eddings, more filters than normal were in the warehouse because US Foundry was still recovering from a recent hurricane and was not accepting large volumes of oil filters.

In the used oil processing area, water and light ends of petroleum are removed from the oil. The water evaporates and the light ends are recovered and used as fuel in the evaporator system [Figure 5]. There are three processing units in operation at this time [Figure 4].

After the removal of water and light petroleum products, the oil then passes through one of two shakers [Figure 8]. Each shaker is equipped with a 200-micron filter to remove particulates. The oil is then stored in tanks for off-site shipment. The sludge that collects in the shaker is pumped by a vacuum truck every couple of weeks and taken to the solidification pit [Figure 11] where it is solidified and shipped for disposal in a landfill in Valdosta, Georgia. Use of the shaker may be concentrating contaminants found in the used oil. A waste determination needs to be performed on the sludge removed from the shaker to determine if it exhibits any characteristics of hazardous waste identified in 40 CFR Part 261 Subpart C [40 CFR 262.11]. Specific condition 4(c)(4) of Part III – Solid Waste Processing requires that oil extracted sludge generated by processing used oil be sampled at the point it is removed from either process unit and before it is mixed with soil or any other material for the purpose of liquid absorption.

Piping throughout the facility is color-coded for easy identification [Figure 8]. Yellow is for burner fuel, lime green is for vapor recovery/off gases, blue is for feed oil, orange is for recovered product, and red is for processed oil.

AIS receives a rail car of used oil every couple of weeks. Used oil is transferred from the rail car to the storage tanks. A rail car transfer area was constructed along the railroad tracks located on the north side of the property; however, the wall between the tracks and the facility is failing [Figure 10]. This area will not be used until the wall can be repaired and the site is safe for employees.

Antifreeze and industrial wastewater are stored in tanks located on the north end of the tank farm [Figures 6, 7].

The solidification area described earlier consists of a covered concrete pad that slopes towards the rear. Waste from sumps, car washes, the on-site shakers, and other sources is mixed with light clay dust in the solidification area and shipped to a non-hazardous waste landfill in Valdosta, Georgia.

The laboratory generates approximately 3 gallons of used oil mixed with xylene each month. The waste is stored in a 5-gallon container and then mixed in with used oil to be processed. During the inspection it was requested AIS lower the glass rack on the top of the 5-gallon container so that the lid would close. Following the inspection, Mr. Eddings had the rack lowered and the lid was able to close properly.

Record Review

AIS drivers calibrate the halogen sniffers on a regular basis. New employees received training in operation of the halogen sniffers and the facility's used oil management plan soon after they are hired. Training is conducted on October 14th and 15th of each year for Florida and Georgia employees.

Incoming load test sheets are attached to the shipping paper for each generator. Each incoming load was marked with a pass/fail for total halogens.

Once a tank of processed oil is full it does not receive any additional oil. The tank is then sampled to ensure it is on-specification. Daily logs note which tanks are being tested.

13. Areas of Concern

Contents of above ground storage tanks in a tank farm diagram provided during the inspection on November 15, 2005, do not match permit Attachment C – Tanks and Contents. Based on information provided during the inspection, tank 1 contained burner fuel and tank 2 contained diesel fuel. Each of these tanks is supposed to contain used oil. Tank 4 contained mineral oil/burner fuel and is supposed to contain raw water. Tank 5 contains wet oil and is supposed to contain treated water. Tanks 20, 21, 22, and 23 each contained water/slop. Each of these tanks is supposed to contain used oil.

There are three used oil processing/treatment units in operation on site, the original re-refining unit and 2 smaller dehydration units. Drawings submitted with the permit application only document the original re-refining unit and 1 of the smaller dehydration units.

General Condition 2 of permit number 161967-HO-003 reads “This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.” Specifically, AIS is managing wastes in tanks that differ from those identified in permit Attachment C – Tanks and Contents.

AIS must review the application, including all drawings and tables, used to support Permit Number 161967-HO-003 and provide the Department with a permit modification request.

14. Summary of Potential Noncompliance Items and Corrective Actions

- a.) **Regulation: Specific Permit Condition 2(b) of Part V. Preparedness and Prevention / Contingency Plan Requirements** – Within 7 days of meeting any criteria listed in 40 CFR 279.52(b)(4), the Permittee shall amend the plan and submit the amended plan for Department approval. This includes 40 CFR 279.52(b)(4)(iv) the list of emergency coordinators changes.

The "*Spill Contingency Plan*" contained in the permit application, which is dated January 23, 2004, identifies John Feagle, VP Operations, as the designated facility contact in case of an emergency. Mr. Feagle no longer works for AIS. An updated Contingency Plan has not been received by the Department.

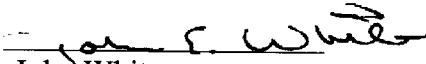
Corrective Action: Within 30 days of receipt of this Warning Letter, AIS must provide the Department with an updated contingency plan.

- b.) **Regulation: Specific Permit Condition 4(c)(4) of Part III – Solid Waste Processing / 40 CFR 262.11** - requires that oil-extracted sludge generated by processing used oil be sampled at the point it is removed from either process unit and before it is mixed with soil or any other material for the purpose of liquid absorption. Specifically, sludge generated by the shakers is not tested prior to solidification to determine if it exhibits any characteristics of hazardous waste identified in 40 CFR Part 261 Subpart C.

Corrective Action: Within 30 days of receipt of this Warning Letter, AIS must provide the Department with all available sample results for shaker sludge obtained during 2005 and 2006 and written assurances that the facility will comply with the permit.

15. **Conclusion**

Atlantic Industrial Services, Inc. was inspected as a used oil processor, used oil and used oil filter transporter and transfer facility, conditionally exempt small quantity hazardous waste generator, and a solid waste management facility and was not in compliance at the time of this inspection.

Report Prepared By: 
John White
Environmental Specialist

March 10, 2006
Date

Report Reviewed By: 
Lu Burson
Environmental Manager

March 10, 2006
Date

cc: Mike Redig, FDEP, Tallahassee, mike.redig@floridadep.net
Laurie DiGaetano, EPA Region 4, digaetano.laurie@epa.gov
Debby Valin, Tallahassee, debby.valin@floridadep.net



Figure 1. Atlantic Industrial Services, Inc. facility layout

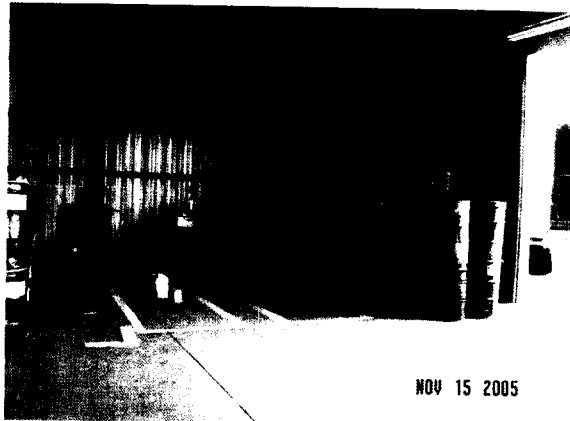


Figure 2. Empty containers

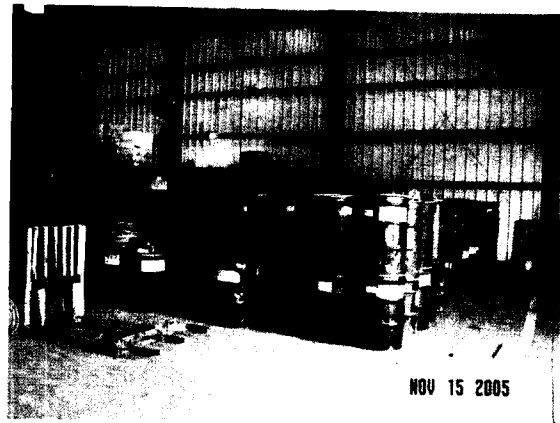


Figure 3. Used oil filter drums



Figure 4. Oil dehydration unit

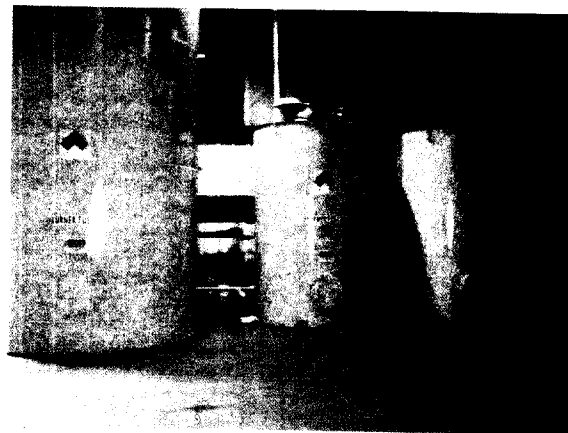


Figure 5. Burner fuel tanks

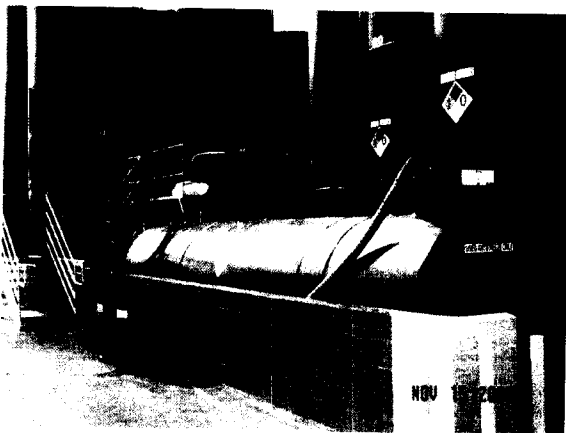


Figure 6. Antifreeze tank

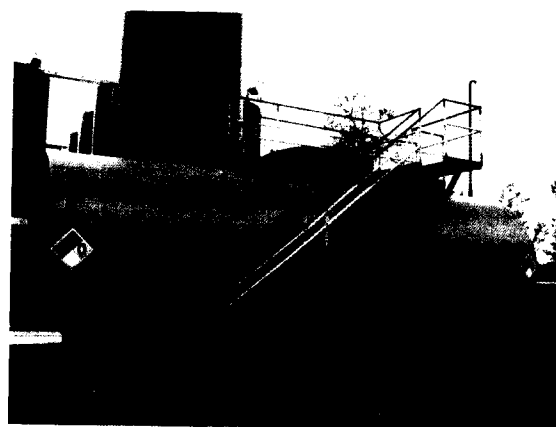


Figure 7. Wastewater tank

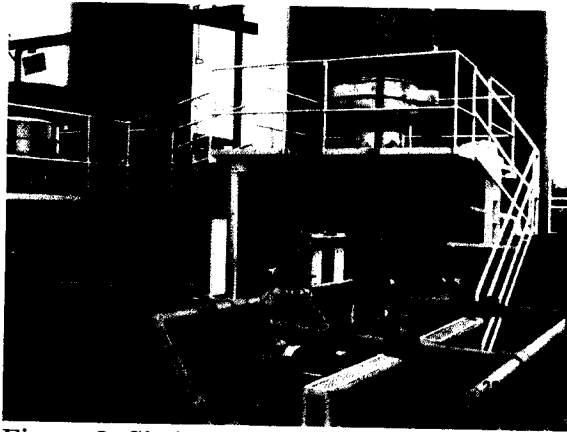


Figure 8. Shaker unit



Figure 9. Tank farm view looking south



Figure 10. Rail car unloading area

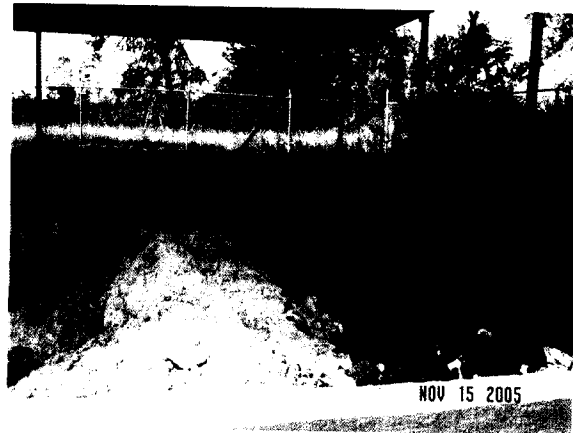


Figure 11. Solidification area

PENALTY COMPUTATION WORKSHEET

Violator's Name: Atlantic Industrial Services

Identify Violator's Facility: AIS Ocala

Name of Department Staff Responsible for the Penalty Computations: John White

ComHaz Case #: 293382

Date: March 8, 2006

	Violation Type	Manual Guide	Potential for Harm	Extent of Deviation	Matrix Range	Multi Day	Other Adjustments	Total
1.	SC 2(b) of Part V	11.2	Minor	Moderate	\$1,649 -- \$550			\$1,100
2.	SC 4(c)(4) of Part III	3.1	Moderate	Major	\$12,099-- \$8,800			\$10,450
TOTAL								\$11,550

Total Penalties for all Violations:

\$ 11,550.00

A Major Extent of Deviation was selected for Item 2 because the requirement to test sludge generated by the operation is included in the facility's permit and no effort was made to meet this requirement.

Multiday penalties were not selected for these violations.

Economic Benefit was not considered for these violations

Penalties Drafted by: John White
Environmental Specialist
March 8, 2006

**WORKSHEET
RANKING SYSTEM FOR POTENTIAL FOR HARM**

FACILITY NAME: Atlantic Industrial Services Ocala Date: March 8, 2006

EPA ID No.: FLR000060301 ComHaz Case #: 293382

	Violation	Description	Nature of Waste	Amount of Waste	Release	People	Total Points
2.	40 CFR 262.11/Permit Condition 4(c)(4) of Part III	No waste determination	4	5	4	2	15

SCORING SYSTEM

NATURE OF WASTE	AMOUNT OF WASTE	RECEPTORS	
		Releases	Affected Population
8 - High hazard wastes	8 - > 5,000 kg (25 drums)	4 - Release	4 - > 1,000
	5 - 1,000 to 5,000 kg	4 - High potential for release	3 - 100 - 1,000
4 - typical hazardous waste	2 - < 1,000 kg (5 drums)		2 - 10 - 100
		1 - No release	1 - <10

MAJOR POTENTIAL FOR HARM: 19-24
 MODERATE POTENTIAL FOR HARM: 13-18
 MINOR POTENTIAL FOR HARM: 8-12