

NEWMOA

Northeast Waste Management Officials' Association

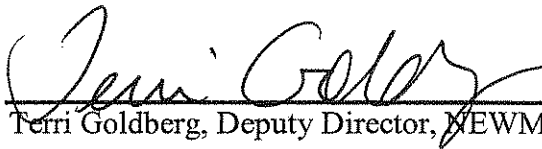
January 2009 through December 2013

QUALITY MANAGEMENT PLAN



William F. Cass, Executive Director, NEWMOA

3/20/09
DATE



Terri Goldberg, Deputy Director, NEWMOA

3/20/09
DATE



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4/6/09
DATE



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4/21/09
DATE

Northeast Waste Management Officials' Association (NEWMOA)

Generic Quality Assurance Project Plan

January 2009 through December 2013

Project Manager Contact Information:

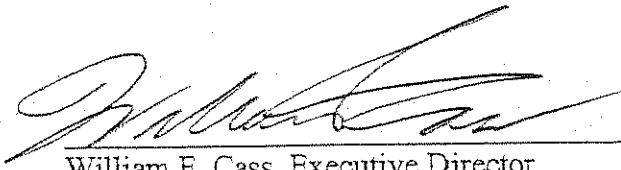
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**Abstract: Generic Quality Assurance Project Plan for NEWMOA Projects That Include
Secondary Data Provided by Participating State Agencies or by Third Parties Voluntarily,
or Pursuant to Participating State Authorities**

Northeast Waste Management Officials' Association

A PROJECT MANAGEMENT

A1. Approval Sheet



William F. Cass, Executive Director
Quality Assurance Officer

3/20/09
Date

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QUALITY MANAGEMENT PLAN FOR THE NORTHEAST WASTE MANAGEMENT OFFICIALS' ASSOCIATION (NEWMOA)

Background

The Northeast Waste Management Officials' Association (NEWMOA) is a non-profit, non-partisan interstate association that was established by the governors of the New England states as an official interstate regional organization, in accordance with Section 1005 of the federal Resource Conservation and Recovery Act (RCRA), to coordinate interstate hazardous and solid waste activities. The organization was formally recognized by the US EPA in 1986. NEWMOA's membership is composed of the state environmental agency directors of the hazardous waste, solid waste, waste site cleanup, emergency response, pollution prevention, and underground storage tank programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

The US Environmental Protection Agency has developed a mandatory Agency-wide Quality Assurance Program that requires all organizations performing work for EPA to develop and operate management processes for ensuring that data or information collected are of the appropriate quality for their intended use. These requirements apply to all organizations that conduct environmental data operations on behalf of EPA through contracts, financial assistance agreements, and interagency agreements.

Unlike the other state sponsored regional environmental associations (The New England Interstate Water Pollution Control Commission and the Northeast States for Coordinated Air Use Management) NEWMOA does not collect, or contract for the collection, process or report quantitative scientific data that is collected for the measurement and reporting of contaminant levels in environmental media, and currently has no plans to do so. Should NEWMOA engage in such activity it would utilize the procedures used by the other regional environmental interstates, in consultation with EPA, to ensure an appropriate level of scientific data-quality. NEWMOA's programs and projects deal primarily with narrative material of policy or programmatic significance. Where data/information are collected and/or presented by NEWMOA, as in the case of solid waste flow information, they are provided by others, in this case the states, along with whatever qualifications on data quality may be appropriate. Therefore, ensuring an appropriate level of data/quality in NEWMOA's programs is a relatively transparent process. For the most part, the adequacy of data quality can be determined and expressed by NEWMOA's clients/members as satisfaction or dissatisfaction with the product, report or activity.

This document presents the Quality Management Plan (QMP) for NEWMOA and commits the Association to providing procedures that will ensure the highest level of quality assurance that is appropriate to the intended use of the data.

Element 1 Management and Organization

1.1 NEWMOA's Mission

NEWMOA's mission is to develop and sustain an effective partnership of states to explore, develop, promote, and implement environmentally sound solutions for the reduction and management of materials and waste, and for the remediation of contaminated sites, in order to achieve a clean and healthy environment.

The group fulfills this mission by providing a variety of support services that:

- facilitate communication and cooperation among member states and between the states and the US EPA; and
- support the efficient sharing of state and federal program resources to help avoid duplication of effort and to facilitate development of regional approaches to solving critical environmental problems in the region.

1.2 Operating Strategies

The NEWMOA Board of Directors developed the following list of strategies for the Association to help achieve its mission in the next five or so years that will inform the Association's annual planning and budget process. NEWMOA develops program and project specific goals, strategies, and activities in its annual work plans. The Strategies below are a near-final draft that is scheduled for final review and adoption by NEWMOA Board of Directors at the March 2009 Directors' Meeting.

INSERT 2009 Strategic Plan here

1.3 Quality Assurance Goal NEWMOA's Quality Assurance Goal is that all environmental data or information gathered by or for the Association will be of an acceptable quality that is sufficient to meet the needs of each program's intended use of the data/information.

1.4 Policy NEWMOA's Quality Assurance Policy is:

- a. All environmental data generated for or by the Association's projects/activities will be of known and acceptable quality. This quality and the associated level of effort of the required QA activities will be designed to meet the needs of each program's intended use of the data. The information developed for all secondary data will be documented and available.
- b. An acceptable and cost-effective program of QA activities will be developed and implemented at the onset of each NEWMOA project that will include secondary data to help ensure that the necessary level of data quality will be achieved.
- c. All NEWMOA projects or activities that gather, compile and report on data will be part of an effective QA program conducted within the framework of the Generic QAPP and, in some cases, Standard Operating Procedures (SOPs) that specify the detailed

procedures required to assure an appropriate level of quality (Please see Appendices B, C, D, E and F).

1.5 Management The Association is governed by a board of directors consisting of the state waste-program directors from the member-states, three of whom serve as the Chair, Vice Chair and Treasurer on a schedule prescribed in the By-laws. For NEWMOA's purposes, the state waste programs include the solid waste, hazardous waste, waste site cleanup, emergency response, underground storage tanks, and pollution prevention programs. Member-state oversight/governance of NEWMOA is exercised primarily at four regular board meetings held each year. Generally, the annual budget, staffing, annual workplan, and individual projects are authorized, reviewed, and approved or disapproved at these meetings.

Responsibility for administering the day-to-day activities of the Association and attaining its goals and objectives is vested in an executive director. He/She is assisted in performing these duties by a staff including a deputy director, project managers, and project staff.

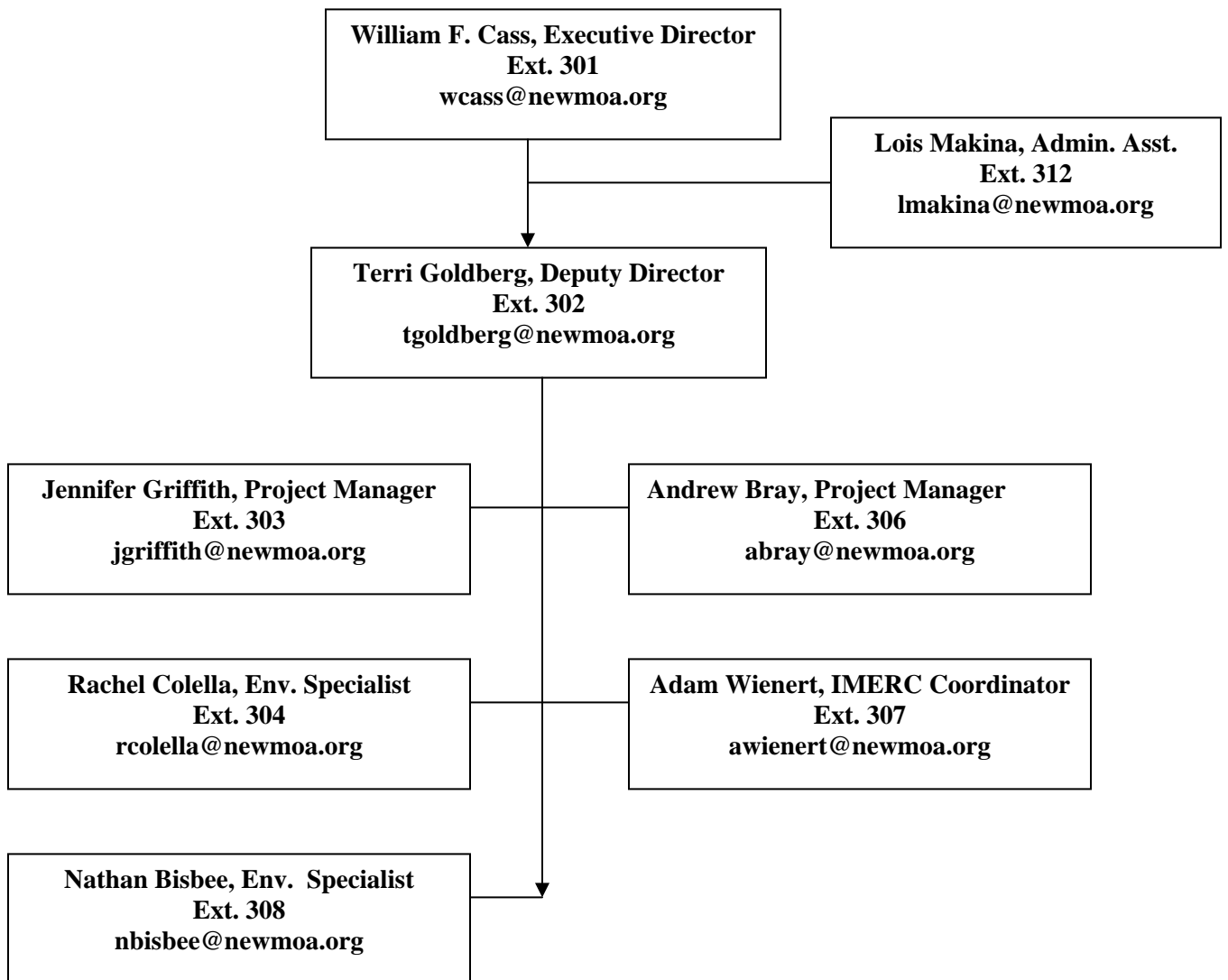
NEWMOA's activities and projects are accomplished by NEWMOA staff and committees/workgroups made-up of state and, in many cases, EPA staff. On occasion, contractors are hired to perform discrete tasks. Virtually all work performed by NEWMOA staff and/or contractors is reviewed by the committees/workgroups prior to final review and acceptance/approval by the directors. Observance of the QA MP and the Generic QAPP will be an integral part of this process.

1.6 Quality Assurance Manager and Quality Contact The Executive Director is the Quality Assurance Manager (QAM) and is responsible to the Board of Directors for ensuring that the Associations QA goals are achieved and that the QMP is followed by NEWMOA project managers and contractors. The Executive Director is responsible for the Association's overall performance. In addition he directly supervises the Solid Waste, Hazardous Waste and Waste Site Cleanup Programs. The Deputy Director assists the Executive Director in administering all of the Association's projects and activities and also directly supervises the Pollution Prevention Program, Toxics Program, and the Interstate Mercury Education Reduction Clearinghouse. Reporting to the Deputy Director is a Project Manager for Solid Waste and Waste Site Cleanup Projects and a Project Manager for Information Management and Pollution Prevention Programs. The Project Managers also assist with other NEWMOA projects as needed. Two additional professional staff-members/environmental specialists work on various projects as needed. An Administrative Assistant provides office management and support services. Finally, interns and personal service contractors are engaged for projects when they are needed.

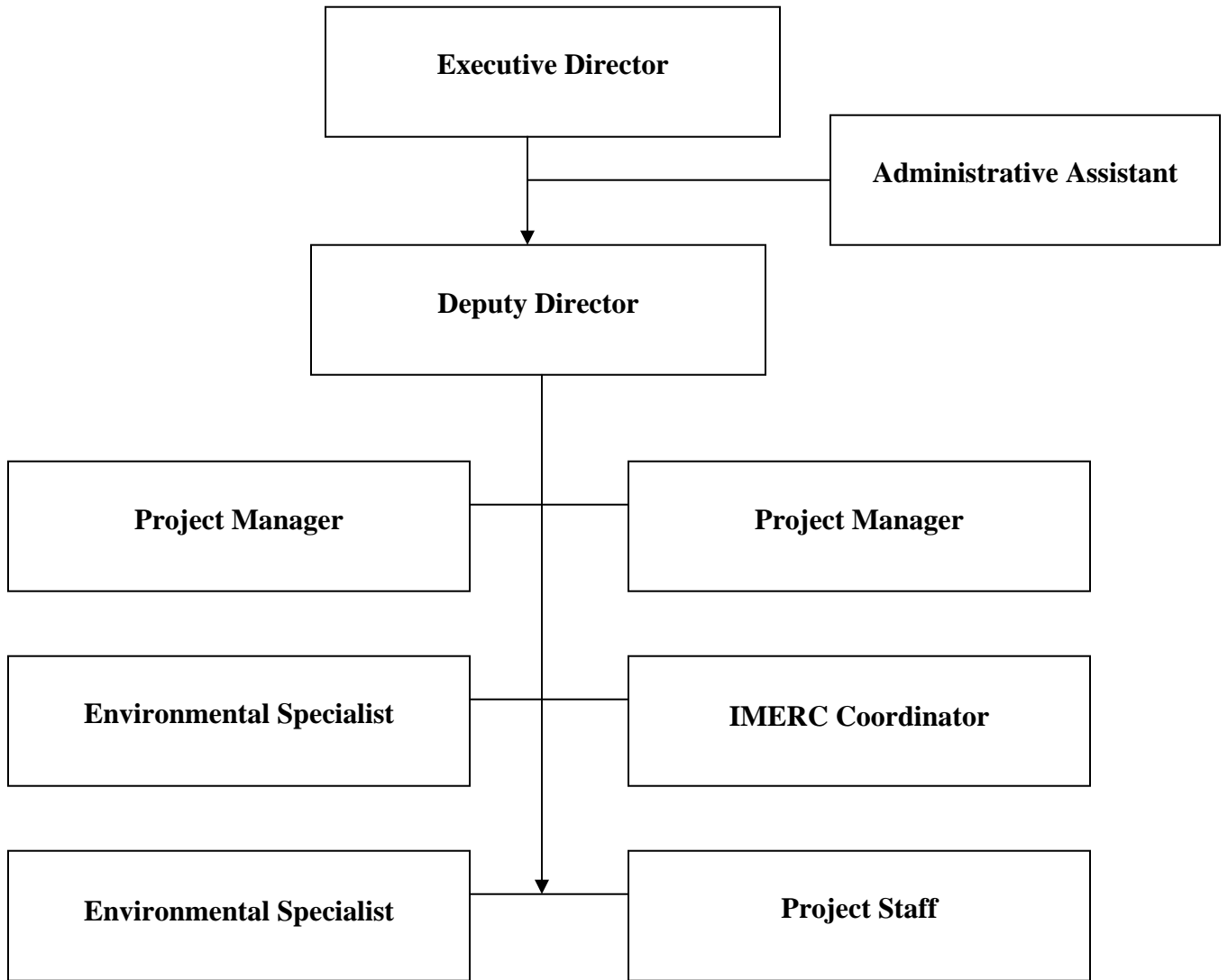
NEWMOA Organization and Staff
January 19, 2010

NEWMOA
129 Portland Street, 6th Floor
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NEWMOA Organization



Element 2 Quality System Components

2.1 QMP-QAPPs and SOPs NEWMOA's Quality System consists of developing and implementing a Quality Management Plan (QMP) a Generic Quality Assurance Project Plan (QAPP), and, for certain ongoing programs, Standard Operating Procedures (SOPs) that are used to ensure that quality programs and products are produced by NEWMOA. NEWMOA and the US EPA recognize that a system of accountability within each others' organization is essential to ensuring quality and the successful management of environmental program funds. Therefore, NEWMOA's member-state Directors, Officers, and the Executive Director follow and direct appropriate staff to follow the principles and guidelines of this System. The Executive Director is responsible for ensuring that NEWMOA projects utilizing secondary data are managed in accordance with the Generic QAPP and applicable SOPs..

2.2 Integration with NEWMOA's Planning and Management Processes

A system of committee/workgroup participation in the design and management of NEWMOA projects, followed by state-director approval, provides the framework for NEWMOA's QMP. Through this system, the state directors and staff are involved at every phase of a NEWMOA project, product or activity, beginning with conceptual approval of project design and ending with final acceptance of project products. The decisions about data quality required for the purpose of each project will be integrated with this process. In some cases, such as solid waste flow measurement, a main purpose of the project is to improve data quality. Where necessary and appropriate, the review of NEWMOA projects consists of line-by-line editorial review and approval of all material before acceptance and release by the state program directors.

The Executive Director, William F. Cass, has been designated as the quality contact. The Deputy Director, Terri Goldberg, will serve as the quality contact when the Executive Director is unavailable and will also assist the Executive Director in ensuring that the QMP, the Generic QAPP and , where applicable, SOPs are followed in the Association's projects involving secondary data. The Project Manager, William Cass will be responsible for ensuring that NEWMOA Project leads and staff assigned to Project Workgroups follow the Generic QAPP.

NEWMOA staff works with representatives of its member-states and with EPA representatives in identifying priority activities and projects, selecting projects, and approving the results/products before completion/approval. The components of this ongoing planning and oversight process include strategic planning, annual workplans, review of federal grant applications, review of project-specific workplans, and review of final products and deliverables. The components of NEWMOA's Planning Process and its Quality Management features are described as follows:

2.3 Strategic Plan NEWMOA's strategic plan (see 1.2 for strategies from the current PROPOSED plan) identifies broad areas of program emphasis that reflect the needs of state environmental programs. The Plan is developed by NEWMOA staff and the Board of Directors in consultation with EPA representatives and is reviewed and updated every

five to six years. For example, the need of states for information concerning the generation and interstate flow of wastes was first identified through the Association's strategic planning process. Obtaining more reliable solid waste data for state planning purposes through the corroboration of various data sources remains a main purpose of this continuing work. To accomplish the work, NEWMOA dedicated staff to the project; state solid waste program staffs were assigned to work with NEWMOA to design an approach; and the project was processed through the planning components described below.

2.4 Annual Workplan NEWMOA's annual workplan is developed over several months and submitted for board approval prior to October first each year. NEWMOA's fiscal year corresponds with the federal fiscal year and therefore goes from October 1 through September 30. Each NEWMOA project is briefly described in the workplan. The workplan is developed in parallel with the NEWMOA's annual budget process that authorizes staffing levels based on workload and federal grant and other funding expectations. The commitment of state program resources to work with NEWMOA on the projects in the workplan is implicit in the directors' approval.

2.5 Project/Grant Proposals NEWMOA's staff discusses new project/grant proposal ideas with state directors and EPA staff at every NEWMOA Board of Directors meeting. Ideas for proposals may come from any state, NEWMOA staff or workgroup, or EPA participant. Often the proposals are developed over the course of several meetings and reflect advice and input from a variety of sources. The NEWMOA board approves each project before work can be initiated.

2.6 Types of NEWMOA Programs and Activities that May Require Quality Management

Reports on State Laws, Regulations & Policies

NEWMOA gathers information from the states and prepares reports that describe state environmental laws, regulations, policies, program elements, or activities and may evaluate and comment on the effect of these. An example is a report summarizing each member-state's laws, regulations, and policies governing the use of innovative technology for the characterization of contaminated sites and evaluating whether or not they discourage the use of innovative technology. The Generic QAPP, based on NEWMOA's routine project management procedures, includes detailed state review to ensure that laws-regulations-policies and their effects are characterized correctly

Reports on Waste Generation & Interstate Movement

NEWMOA prepares reports that incorporate, and present solid waste and hazardous waste generation and movement information that is provided by the member states. An example is the report entitled "Interstate Flow of Municipal Solid Waste among the NEWMOA States." The procedures described in the Generic QAPP ensure corroboration of waste data from various interstate/intrastate sources and explaining or, where possible, correcting discrepancies. Other safeguards mentioned in the Generic QAPP include

appropriate disclaimers and explanations to accompany presentation of the data in the report.

Maintaining a Repository of Notification Forms Submitted by Regulated Entities on Mercury-Added Products & Managing an Online Database of the Information

Recent laws in several member-states require manufacturers and/or certain other organizations to notify them regarding the mercury content of mercury-added products. These states have formed NEWMOA's program, called the Interstate Mercury Education and Reduction Clearinghouse (IMERC)¹ to provide a repository and to create an online database for this information. IMERC is responsible for facilitating state review and approval of the Mercury-added Product Notification Forms, developing and managing a database from the information, and making certain information concerning mercury in products available to states, businesses, and the public on its website and by other means. These activities are covered by detailed SOP's that are attached in Appendix B.

Regional Pollution Prevention (P2) Information Center

In one of its roles NEWMOA acts as a Regional Pollution Prevention (P2) Information Center. This Center is one of eight regional information centers that make up a national P2 information network known as the Pollution Prevention Resource Exchange (P2Rx). Within P2Rx, NEWMOA and the other regional centers have developed a number of database-driven web-based information resources. Most notable among these resources are the Topic Hubs and the Regional Programs Directories. In developing these resources, P2Rx developed collection policies, data standards, and quality assurance measures to ensure the quality of the qualitative data that is collected. These standards and policies are attached in the Appendices C and D.

Element 3 Personnel Qualifications and Training

3.1 Commitment NEWMOA is committed to hiring and retaining qualified staff and to providing all staff with appropriate training to ensure quality performance in fulfilling its mission.

3.2 Hiring Procedures

Job descriptions are required for all authorized positions. Each job description and its pay scale must be approved by the Board of Directors before that position can be filled. The Executive Director shall select and appoint persons for positions that are authorized

¹ In 2001 the Northeast Waste Management Officials' Association (NEWMOA) launched the Interstate Mercury Education and Reduction Clearinghouse (IMERC) to provide

- ongoing technical and programmatic assistance to states that have enacted provisions of the Mercury Education and Reduction Model Legislation
- a single point of contact for industry and the public for information on mercury-added products and member states' mercury education and reduction programs

by the Board of Directors and included in the budget. Appointments for employees shall be made after a job description for such position has been developed and the description, including a salary range, has been approved by the Board of Directors. Rates of pay for employees shall also be approved by the Board of Directors except that interns shall be compensated at rates approved by the Executive Director. The Executive Director shall report to the Board of Directors at the next regular business meeting on all appointments to fill positions authorized by the Board.

Present employees shall be advised of openings prior to or concurrent with the beginning of external recruitment. NEWMOA reserves the right to select the best candidate for a position, as determined by it in its sole discretion, whether from within or outside the organization. The external recruitment of candidates may be through the use of resumes on file, circulation of job opportunity announcements to state environmental programs, employment agencies, college placement offices, posting on websites, open advertising or other suitable methods, as determined by NEWMOA.

3.3 Staff Qualifications and Position Descriptions

NEWMOA currently has nine levels of staff as follows:

1. Executive Director
2. Deputy Director
3. Project Managers
4. Environmental Specialist
5. Project Staff
6. Special Consultant (Technical and Policy)
7. IMERC Coordinator
8. Administrative Assistant
9. Interns

The following describes the minimum qualifications and job requirements for each of these levels of NEWMOA staff and the associated starting salaries. All subsequent STEP increases are determined by the NEWMOA Board of Directors. The NEWMOA Board of Directors can create new positions and job descriptions to address the staffing requirements for new programs.

Title: Executive Director

Location: NEWMOA, 129 Portland Street, Suite 602, Boston, MA 02114

Salary: To be determined by the NEWMOA Board of Directors; benefits include: vacation, personal and sick leave, health and dental insurance, and retirement contribution.

Minimum Qualifications

Experience

Minimum of 15 years of full time or equivalent part time professional experience in the field of environmental science, at least 5 of which should be in a management capacity involving planning, budgeting, personnel management and technical oversight of a complex project/program. Applicants can also have an equivalent combination of the required experience and the following educational substitutions.

Education

An undergraduate degree from a recognized school with a major in Biology, Chemistry, Physics, Earth Science, Environmental Science, or Engineering may be substituted for a maximum of one year of the required experience. A graduate degree from a recognized school with a major in environmental science, public policy, planning or public health from a recognized school may be substituted for a maximum of one year of the required experience.

License

None required

Basic Knowledge and Skills

- Extensive knowledge of federal and state waste management and P2 policies and programs
- Excellent communications skills, both verbal and written
- Good organizational skills
- Excellent facilitation, teamwork and problem solving skills
- Ability to work effectively with scientists, engineers, and policy makers and to establish professional credibility
- Demonstrated ability to supervise staff
- Demonstrated ability to communicate and work closely with the Board of Directors
- Understanding of non-profit management
- Demonstrated ability to supervise the financial management of the Association
- Demonstrated ability to manage and prepare budgets, grant proposals and contracts
- Demonstrated ability to communicate effectively with EPA and other federal officials at all levels
- Excellent presentation skills

General Duties and Responsibilities (Specific Duties and Responsibilities May be Assigned for Specific NEWMOA Programs)

- Manages NEWMOA workgroup/s of state staff and managers on particular issues
- Supervises development of the annual program workplan and budgets
- Supervises development of strategic plans for NEWMOA
- Overseas EPA grants and ensures fulfillment of grant requirements
- Organizes Directors meetings and conference calls
- Organizes the Executive Committee meetings and conference calls
- Reviews and approves policy papers and comments to EPA and others
- Supervises preparation of the NEWMOA Annual Report
- Supervises Deputy Director and Staff
- Ensures preparation of progress reports to EPA
- Manages the organization and the training activities
- Supervises procurement of outside contractors
- Supervises annual audit and financial management activities
- Ensures implementation of NEWMOA's Quality Management Plan and acts as QM contact

Supervisory Controls

The NEWMOA Executive Director is under the supervision of the Board of Directors. Job performance is evaluated by the Board of Directors.

Title: Deputy Director

Location: NEWMOA, 129 Portland Street, Suite 602, Boston, MA 02114

Starting Salary: \$65,000 per year. Salary consideration will be given for higher levels of qualifications. Benefits include: vacation, personal and sick leave, health and dental insurance, and retirement contribution.

Minimum Qualifications

Experience

Minimum of ten years of full time or equivalent part time professional experience in the field of environmental science, a least five years of which should be in a supervisory/managerial capacity involving planning, budgeting, personnel management and technical oversight of a complex project/program, or equivalent combination of the required experience and the following educational substitutions:

Education

An undergraduate degree from a recognized school with a major in Biology, Chemistry, Physics, Earth Science, Environmental Science, or Engineering may be substituted for a maximum of two years of the required experience. A graduate degree from a recognized school with a major in one of the fields listed above may be substituted for a maximum of one year of the required experience.

License

None required

Basic Knowledge and Skills

Knowledge of federal and state waste management and P2 policies and programs
Extensive knowledge of federal, state and other funding sources
Excellent communications skills, both verbal and written
Good organizational skills
Excellent facilitation, teamwork and problem solving skills
Ability to work effectively with scientists, engineers, and policy makers and to establish professional credibility
Ability to work independently and as part of a team
Ability to manage and prepare budgets, work plans, grant proposals and contracts
Excellent presentation skills

General Duties and Responsibilities (Specific Duties and Responsibilities to be Assigned)

- Manages and prepares NEWMOA grants and contracts
- Manages special NEWMOA-wide projects (for example the Mercury Project)

- Researches and seeks new funding opportunities for the Association
- Ensures fulfillment of grant requirements
- Manages NEWMOA staff on particular projects
- Prepares policy papers and comments to EPA and others as needed
- Participates in NEWMOA Board of Directors meetings and prepares presentations
- Assists Executive Director with preparation of the NEWMOA Annual Report
- Assists with the organization of the NEWMOA Training Programs
- Supervises preparation of technical or policy reports and memos
- Manages procurement and activities of outside contractors
- Makes presentations on NEWMOA programs and projects

Supervisory Controls

Deputy Director is supervised by the NEWMOA Executive Director and the Board of Directors. Job performance is evaluated by the Executive Director.

Title: Project Manager

Location: NEWMOA, 129 Portland Street, Suite 602, Boston, MA 02114

Starting Salary: \$45,000 per year. Salary consideration will be given for higher levels of qualification. Subsequent STEP increases are determined by the NEWMOA Board of Directors. Benefits include: vacation, personal and sick leave, health and dental insurance, and retirement contribution. If the Project Manager works less than 30 hours per week, they are classified by NEWMOA as part time and are paid on an hourly basis. Part time staff are not entitled to benefits. Part time staff receive added compensation in lieu of these benefits.

Minimum Qualifications

Experience

Minimum of five years of full time or equivalent part time professional experience in the field of environmental science or equivalent combination of the required experience and the educational substitutions described below.

Education

An undergraduate degree from a recognized school with a major in Biology, Chemistry, Physics, Earth Science, Environmental Science, or Engineering may be substituted for a maximum of two years of the required experience. A graduate degree from a recognized school with a major in one of the fields listed above may be substituted for a maximum of one year of the required experience.

License

None required

Basic Knowledge and Skills

Knowledge of federal and state waste management and P2 policies and programs
Excellent communications skills, both verbal and written
Good organizational skills
Excellent facilitation, teamwork and problem solving skills
Ability to work effectively with scientists, engineers, and policy makers and to establish professional credibility
Ability to work independently and as part of a team
Ability to assist with managing and preparing budgets, grant proposals and contracts

General Duties and Responsibilities (Specific Duties and Responsibilities to be Assigned Depending on the NEWMOA Program)

- Manages NEWMOA workgroup/s of state staff and managers on particular issues
- Manages annual project workplan and budgets

- Assists with preparing EPA grants and fulfillment of grant requirements
- Provides information for state members on particular topics
- Organizes workgroup meetings and conference calls
- Assists with preparing policy papers and comments to EPA and others as needed
- Helps prepare progress reports to EPA
- Assists with the organization of NEWMOA Training Programs
- Organizes training workshops, conferences or seminars as necessary
- Prepares technical or policy documents, reports and memos

The satisfactory performance of the above duties and responsibilities requires the staffperson to have a thorough understanding of NEWMOA's programs, organization and policies to exercise initiative and resourcefulness in complicated situations and to be able to work effectively with state and federal contacts at both staff and management levels and with varied professional backgrounds. Required is the ability to organize the workload and perform tasks in an accurate, conclusive and timely manner.

Supervisory Controls

Project Managers are under the supervision of the NEWMOA Deputy Director and the Board of Directors. Job performance is evaluated by the Deputy Director in consultation with the Executive Director

Title: Project Staff (Technical and Policy)

Location: NEWMOA, 129 Portland Street, Suite 602, Boston, MA 02114

Starting Salary: \$32,000 per year. Salary consideration will be given for higher levels of qualifications. Subsequent STEP increases are determined by the NEWMOA Board of Directors. Benefits include: vacation, personal and sick leave, health and dental insurance, and retirement contribution. If the staff person works less than 30 hours per week, they are classified by NEWMOA as part time and are paid on an hourly basis. Part time staff are not entitled to benefits. Part time staff receive added compensation in lieu of these benefits.

Minimum Qualifications

Experience

Minimum of three years of full time or equivalent part time professional experience in the field of environmental science or equivalent combination of the required experience and the educational substitutions described below.

Education

An undergraduate degree from a recognized school with a major in Biology, Chemistry, Physics, Earth Science, Environmental Science, or Engineering may be substituted for a maximum of two years of the required experience. A graduate degree from a recognized school with a major in one of the fields listed above may be substituted for a maximum of one year of the required experience.

License

None required

Basic Knowledge and Skills

Knowledge of federal and state waste management and P2 policies and programs
Excellent communications skills, both verbal and written
Good organizational skills
Excellent facilitation, teamwork and problem solving skills
Ability to work effectively with scientists, engineers, and policy makers and to establish professional credibility
Ability to work independently and as part of a team

General Duties and Responsibilities (Specific Duties and Responsibilities to be Assigned Depending on the NEWMOA Program)

- Assists Project Manager and Deputy Director with overall implementation of the project and project planning and reporting
- Assist with NEWMOA workgroup/s of state staff and managers on particular issues

- Provides information for state members on particular topics
- Assists with organizing workgroup meetings and conference calls
- Assists with preparing policy papers and comments to EPA and others as needed
- Prepares technical or policy documents, reports and memos
- Prepares policy position papers, as needed
- Assists with research on particular topics and prepares presentation of the results of the research

The satisfactory performance of the above duties and responsibilities requires the staff person to have a thorough understanding of NEWMOA's programs, organization and policies to exercise initiative and resourcefulness in complicated situations and to be able to work effectively with state and federal contacts at both staff and management levels and with varied professional backgrounds. Required is the ability to organize the workload and perform tasks in an accurate, conclusive and timely manner.

Supervisory Controls

Project staff are under the supervision of the NEWMOA Project Managers and Deputy Director. Job performance is evaluated by the Project Manager (s) and Deputy Director.

Title: Interstate Mercury Education & Reduction Clearinghouse Coordinator

Location: NEWMOA, 129 Portland Street, Suite 602, Boston, MA 02114

Starting Salary: \$45,000 - \$50,000/year plus benefits. Salary consideration will be given for higher levels of qualifications. Subsequent STEP increases are determined by the NEWMOA Board of Directors. Benefits include: vacation, personal and sick leave, health, dental, and life insurance, and retirement contribution. If the Project Manager works less than 30 hours per week, they are classified by NEWMOA as part time and are paid on an hourly basis. Part time staff are not entitled to benefits. Part time staff receive added compensation in lieu of these benefits.

Minimum Qualifications

Experience

Qualified candidates should possess expertise in developing written materials, making presentations, maintaining databases and entering data, facilitating groups, and conducting outreach and assistance. Candidates should possess good writing and interpersonal skills.

Preference will be given to candidates that have a strong interest and background in environmental policy, science, or engineering.

Education

At a minimum, candidates should possess an undergraduate degree in environmental science, engineering, or policy and two years of full time or equivalent part time professional experience in the field of environmental science, planning, or public policy.

License

None required

Basic Knowledge and Skills

The candidate must be able to

- work effectively with scientists, engineers, and policy makers and to establish professional credibility
- well organized, dedicated, able to handle a high degree of detailed information and data, high energy, and a self-starter
- work independently and as part of a team is essential
- should be proficient with Microsoft Office Software Applications, including Word, Excel, PowerPoint, and Access

General Duties and Responsibilities (Specific Duties and Responsibilities to be Assigned Depending on the NEWMOA Program)

- coordinate a single point of contact for submission of mercury-added product notification information

- maintain and upgrade an online database that facilitates quick retrieval of data on mercury-added products, as reported by manufacturers
- maintain a Web page that presents available information on state implementation of mercury education and reduction legislation, and other relevant information on mercury-added products
- handle phone, Website, and e-mail inquiries and requests for assistance and information
- support member states with implementing their mercury-added product labeling requirements
- support member states with public education and outreach activities related to mercury education and reduction legislation
- facilitate states' reviews of phase-out exemption applications and collection system plans
- organize and facilitate IMERC meetings and conference calls
- develop compliance assistance materials to help the regulated community and the public understand state mercury-added product requirements
- ongoing technical and programmatic assistance to states that have enacted mercury education and reduction legislation;
- a single point of contact for industry and the public for information on mercury-added products and member states' mercury education and reduction programs. Overall IMERC facilitates deliberations that provide advice and assistance to the individual states for their decision-making;
- collects and manages data submitted by manufacturers of mercury-added products, as necessary to implement the notification provisions of state mercury reduction legislation;
- facilitates interstate collaboration on the development and implementation of public education and outreach programs on mercury-added products;
- makes information on mercury-added products available to industry and the public;
- responds to public information requests for information on mercury-added products, state requirements, and the status of state implementation of their laws; and
- provides technical assistance, facilitates reviews, and makes recommendations to the member states concerning (i) manufacturers' applications for exemptions to the phase-out of mercury-added products; (ii) manufacturers' applications for alternative labeling of mercury-added products; and (iii) manufacturers' plans for collection and proper waste management of mercury-containing materials.
- conduct data analysis and help to prepare reports and other documents
- research available information on certain mercury containing products, perform data entry in the mercury-added products database (<http://www.newmoa.org/prevention/mercury/imerc/notification/>), and assist in organizing electronic and hard-copy files related to this topic.

Supervisory Controls

The IMERC Coordinator will be supervised by NEWMOA's Deputy Director.

Title: **Special Consultant (Technical and Policy)**

Location: NEWMOA, 129 Portland Street, Suite 602, Boston, MA 02114

Starting Salary: From time to time NEWMOA may require the services of a person or persons having unique technical/professional qualifications that are not covered within the regular job descriptions. In these instances the Board of Directors shall establish the qualifications and salary range on a case-by-case basis.

Title: Interns

Location: NEWMOA, 129 Portland Street, Suite 602, Boston, MA 02114

Salary: \$10.00 – 15.00 per hour; salary consideration will be given for higher levels of qualification; benefits not provided.

Minimum Qualifications

License

None required

Education

Has earned 30 credits toward or is currently enrolled in a degree program in a subject matter related to the environmental field (e.g., engineering, public policy, law, public health or science)

Basic Knowledge and Skills

Knowledge of federal and state waste management and P2 policies and programs

Excellent communications skills, both verbal and written

Good organizational skills

Excellent problem solving skills

Ability to work effectively with scientists, engineers, and policy makers and to establish professional credibility

Ability to work independently and as part of a team

General Duties and Responsibilities (Specific Duties and Responsibilities to be Assigned Depending on the NEWMOA Program)

- Assists Project Manager with overall implementation of the project and project planning and reporting
- Assist with NEWMOA workgroup/s of state staff and managers on particular issues
- Provides information for state members on particular topics
- Assists with organizing workgroup meetings and conference calls
- Assists with preparing policy papers and comments to EPA and others as needed
- Prepares technical or policy documents, reports and memos
- Assists with research on particular topics and prepares presentation of the results of the research

Supervisory Controls

Interns are under the supervision of the NEWMOA Project Managers, and/or the Deputy Director, depending on who is designated as their supervisor in their job description. Job performance is evaluated by their supervisor.

Title: **Administrative Assistant**

Location: NEWMOA, 129 Portland Street, Suite 602, Boston, MA 02114

Starting Salary: Starting at \$27,000 per year; salary consideration will be given for higher levels of qualification. Subsequent STEP increases are determined by the NEWMOA Board of Directors. Benefits include: vacation, personal and sick leave, health and dental insurance, and retirement contribution.

Minimum Qualifications

Experience

Minimum of three years of full time or equivalent part time professional experience in office management and administration

Education

Undergraduate degree

Basic Knowledge and Skills

Excellent communications skills, both verbal and written

Good organizational skills

Ability to type quickly

Skill with word processing software

Ability to work effectively with a wide variety of people and juggle the competing demands of the NEWMOA staff

Ability to work independently and as part of a team

Ability to manage and organize the office

Ability to handle multiple tasks simultaneously

Ability to assist with organizing logistics for meetings and conferences

Ability to organize and manage the filing system

Ability to prepare limited financial reports

Ability to handle purchasing and procurement of office supplies

Ability to manage a mailing list database

Ability to track and record office activities

General Duties and Responsibilities

- Manages NEWMOA office
- Manages photocopying, printing and faxing
- Helps to organize conference calls, meetings and conferences
- Answers the phone and handles general inquiries
- Manages inventory of office supplies and materials
- Interacts with vendors and suppliers
- Prepares memos, directors' meetings minutes, reports and other documents
- Prepares quarterly MBE/WBE reports to EPA

- Reviews all invoices for correct signatures and codes
- Conducts mailings
- Prepares a NEWMOA Directory of Member Programs
- Ensures the smooth flow of work through the office
- Assists the NEWMOA staff and management with special projects if needed

Supervisory Controls

The Administrative Assistant is under the supervision of the NEWMOA Executive Director and the Deputy Director. Job performance is evaluated by the Executive Director and the Deputy Director, jointly.

3.4 Professional Development and Training

NEWMOA is committed to ensuring that its staff receives appropriate training to facilitate their performance and encourages their professional development. New employees are provided with an employee manual that provides detailed information regarding the Association's policies and procedures. The QMP and information about accessing QAPPs and SOPs will be included in the manual. Employees are encouraged and, where appropriate, receive financial support to participate in professional training provided by various organizations including NEWMOA's training programs. Professional/technical training as a part of each employee's development objectives is raised and addressed in NEWMOA's annual employee performance review.

3.5 Training for Quality

All NEWMOA employees will be required to read this QMP. Through integrating the QMP with NEWMOA's program and project development process, each project manager will participate in identifying the data/information quality that will be needed for each project and will address those needs as summarized in the Generic QAPP or an SOP when necessary. NEWMOA's staff will also impart information concerning the Association's commitment to quality and the requirements of this plan and the QAPP/SOPs to state directors and state staff participating on workgroups.

Element 4 Procurement of Items and Services

NEWMOA has not to date and does not at this time anticipate the purchase of goods and services for the collection of quantitative, scientific environmental or material data.

4.1 Procurements

The procurements of goods and services are managed in accordance with EPA grant requirements applicable to states and other government entities. A copy of the current guidance from the Grants Information and Management Section, US EPA Region 1-New England; and a copy of the 40 CFR, Part 31 are included in Appendix B of the NEWMOA Financial Management and Procedures Manual.

NEWMOA's policy is to identify and use minority and women-owned businesses where they offer comparable goods and services at competitive costs. To facilitate the implementation of this policy, NEWMOA uses the latest available federal and state publications to identify minority and women-owned (MBE/WBE) vendors of goods and services and utilizes these vendors directly or in the case of purchases made through its procurement process, invites these providers to submit proposals addressing NEWMOA's needs. NEWMOA follows these and the other requirements of the steps identified in 40 CFR, Part 31 Section 31.36(e) and documents its efforts to comply therewith. NEWMOA reports all MBE/WBE procurements to EPA's Small and Disadvantaged Business Utilization Officer, 26 W. Martin Luther King Drive, Cincinnati, OH 45268 for each grant, within 15 days of the end of the fiscal year (October 1 – September 30), in accordance with its grant agreements.

The NEWMOA staff must obtain verbal approval from the Executive Director/Deputy Director prior to making purchases of \$1,000 or greater. For procurements/contracts under \$25,000, three price quotes are solicited, where three vendors are available. To

obtain these quotes, NEWMOA prepares a request for proposals that is sent to the eligible contractors. For procurements of \$25,000 and greater, a request for proposals is advertised and procurements are made using the lowest qualified bidder.

The procurement of goods and services from a sole source, without seeking or obtaining multiple price quotes must be justified in detail, in writing, and approved by the Executive Director.

4.2 Purchasing Guidelines

These guidelines are intended to describe procedures to follow to ensure that NEWMOA buys green goods and services at the best price for the level of quality needed.

In addition to price, issues to be considered are quality, service, reliability, history of satisfactory performance, responsiveness, and environmental sensitivity. Recycled and recyclable products should be used, whenever possible. NEWMOA's affirmative action policies call for preference to be given to purchasing goods and services from minority-and women-owned businesses.

The following is a list of some of the minority-and women-owned businesses that NEWMOA uses:

WBE/MBE Organizations

FineLine Communications P.O. Box P-66 South Dartmouth, MA 02748 Contact: Beverly Carter beverlycarter@comcast.net FIN: 04-3109902	(508) 992-6958	Graphics design, editing (WBE)
John Leonard (temp agency) 75 Federal Street Boston, MA 02114 FIN: 04-3388593	(617) 423-6800	Clerical (WBE)
New England Office Supply 135 Lundquist Drive Braintree, MA 02184 FIN: 04-2880476-00008	(800) 345-7080	Office supplies (WBE)
Norton Enterprises, Inc. 358 Chestnut Hill Ave # 305 Brighton, MA 02135 FIN: 04-3140836	(617) 566-6043	Laser printer toner (MBE)

should be selected unless there are reasons to pick another based on quality, service, reliability, performance, responsiveness, or environmental sensitivity. Again, NEWMOA's policies call for preference to be given to minority- and women-owned businesses.

One-time purchases of standard items over \$1,000--office equipment, for example, should be supported by price and terms quotes from at least three vendors. If the purchase involves a specified product (e.g., a computer of a specific type and configuration), three price quotes should be obtained. If the purchase involves a generic but branded product (e.g., a photocopier with a specified list of features, but without a brand preference) there should be comparisons among at least five brands and/or vendors.

Element 5 Documents and Records

The most comprehensive, chronological reference record of NEWMOA's decisions, activities, products, grants, contracts and financial status may be found in the briefing materials for that are produced for each Directors' Meeting. NEWMOA conducts green meeting, as a result, there are no hard copies printed. The NEWMOA Board of Directors' Meeting materials are posted in the password protected area of NEWMOA's website. EPA participants in NEWMOA Directors' Meetings are provided with all briefing materials, including detailed minutes of Directors' Meeting Minutes, Workplans and Project Descriptions. Complete copies of all computer files and activity are made automatically and stored off-site.

Central Files

NEWMOA maintains a main or central filing system. The files are located in the file cabinets next to the copy machine and are maintained by the Administrative Assistant. These files cover the following:

- NEWMOA founding
- By-Laws
- Grants and contracts
- Employee benefits
- Office insurance
- NEWMOA positions
- Travel Policy
- NEWMOA Directors' Meeting Packets
- Annual Training Conference
- Financial Reports

Materials that are 3 years or older are archived and stored in the storage room. All archived boxes should always be clearly labeled. The storage room is located on the 6th floor of 129 Portland Street, and is the first door to the left as you come out of the elevator. Older materials are archived in file boxes and kept in the storage room.

Financial Files

The financial files are maintained by the financial management contractor/book keeper in a file cabinet next to the financial contractor's desk. Copies of all electronic financial records are made weekly and are stored off site.

Grants/Contracts

The financial management contractor keeps separate copies of all NEWMOA's grants and contracts in order by the grant number. All information pertaining to a particular grants/contracts is kept in one folder. For example, information on grant "A109" including the application, A-95 review, and any other communication is kept in a folder labeled A109.

Element 6 Computer Hardware and Software

NEWMOA does not collect, process or report quantitative scientific data such as the measurement of contaminant levels in environmental media and currently has no plans to do so. NEWMOA's computer applications are used primarily for narrative material and typical non-scientific office applications. Ensuring an appropriate level of data/quality is therefore a transparent process the success of which can be determined and expressed by NEWMOA's clients/users as "general satisfaction" or the "absence of avoidable errors."

NEWMOA has eight computer work stations that are linked through a server and a separate station that is used for financial management purposes. Two lap-top computers are also available. NEWMOA Project Manager Andrew Bray functions as NEWMOA's Information Management Systems Lead. Andy is assisted in this role by a contracting firm that provides technical assistance concerning hardware and software requirements and direct services regarding software installation, hardware/software troubleshooting, configurations and repairs. Decisions about system needs and development priorities are made by the Executive Director and Deputy Director assisted by Andy and in consultation with the staff that will be using the various applications. The purchase of computer components is made through the competitive process described under Procurements in Element 5 of this document.

Andrew Bray is also responsible for the overall operation of NEWMOA's major electronic applications including its databases and its website. The website is operated under contract with an internet services provider that hosts the web-site and provided assistance with its design.

Element 7 Planning

NEWMOA's overall planning process and its individual project planning process are described in Element 2. In addition to NEWMOA's internal processes, most of its activities are conducted under EPA grants/Cooperative Agreements that require a definitive statement of project goals, outputs and/or products. Periodic interim reports and final reports concerning project accomplishments are required. Where outputs are late, missing or deficient an explanation is required. In addition, NEWMOA's directors and EPA participants at NEWMOA Directors' Meetings are provided with quarterly reports identifying all of NEWMOA's accomplishments during the period and an annual

report that details accomplishments for the year. A comprehensive Annual Report explaining the Association's major accomplishments is published each year.

Element 8 Implementation of Work Processes

The planning and management systems that NEWMOA employs are based on consensus between the clients/users of the products and services, those performing/producing the products and services and those funding the activities concerning the controls needed to ensure success. Areas of required agreement include: project goals, activities, schedules, budgets, definition of products/services and measures of success. The need for QA/SOP's to ensure conformance to particular expectations is a key determination in the planning of a project. For example, in the case of the product notification activities involved in IMERC's service to state mercury programs and product registrants, the IMERC Notification Committee, that included representatives of each NEWMOA state implementing the relevant mercury law, recognized that clearly defined policies, procedures and correspondence would be needed to ensure that states and registrants would know precisely how IMERC's registration efforts would be managed. Consequently, IMERC's Product Registration SOP is very detailed to ensure consistency and predictability in the conduct of its business.

Element 9 Assesment and Response

NEWMOA's planning and management cycle is conducted annually to coincide with NEWMOA's fiscal year, which is the same as the federal fiscal year. A detailed report of NEWMOA's accomplishments, for comparison to its approved work plan for the year, is provided to NEWMOA's Directors toward the end of the fiscal year. The Executive Director's Performance and the performance of NEWMOA staff are reviewed based on performance relative to the work plan. Corrective measures are detailed in the Executive Director's annual employment contract and in each employee's performance appraisal report. Corrective measures would also be included in the Association's work plan for the coming year. All of these activities are conducted in the context of a multi-year strategic plan.

Individual projects are subjected to regular review by state directors and state staff in the work- groups that are managing the projects. Regular updates and consensus on the next steps are characteristic of this project management process. Finally, projects that produce written products are subjected to final review and approval by state workgroups and program directors.

The goal of this process is to identify deficiencies and correct them before work is completed.

The NEWMOA project review and management process is integrated with EPA grant management procedures.

Element 10 Quality Improvement

Periodic review and revision/refreshment of NEWMOA's mission and strategic direction is conducted through direct consultations of member-states, EPA, and NEWMOA staff to ensure that NEWMOA understands and meets its member states' environmental program

support needs. The annual planning and review process described in this report ensures that the member states are in control of NEWMOA's priorities and are actively involved with NEWMOA staff in assuring the quality and utility of its work, and that areas of deficiency are detected and corrected expeditiously. Finally, NEWMOA's project management practices ensure that each project will be planned to meet the needs and requirements of the states and EPA and that products and expectations are clearly defined and documented. NEWMOA's goal is to anticipate potential problem areas in performing the work and to detect and correct any problems that may occur before completion of the project wherever possible. NEWMOA's planning, management and continuing efforts to update and improve its performance at all levels are well documented in the form of meeting notes, minutes and reports that are distributed broadly and maintained for easy access by interested parties.

Appendices

Appendix A

Draft

NEWMOA FY 2009 WORKPLAN, COVERING PROGRAM GOALS, & PROJECT STRATEGIES, ACTIVITIES & OUTCOMES

What is NEWMOA?

The Northeast Waste Management Officials' Association (NEWMOA) is a non-profit, non-partisan interstate association that was established by the governors of the New England states as an official interstate regional organization, in accordance with Section 1005 of the federal Resource Conservation and Recovery Act (RCRA), to coordinate interstate hazardous and solid waste activities. The organization was formally recognized by the US EPA in 1986. NEWMOA's membership is composed of the state environmental agency directors of the hazardous waste, solid waste, waste site cleanup, emergency response, pollution prevention, and underground storage tank programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

NEWMOA's Mission

NEWMOA's mission is to develop and sustain an effective partnership of states to explore, develop, promote, and implement environmentally sound solutions for the reduction and management of materials and waste, and for the remediation of contaminated sites, in order to achieve a clean and healthy environment.

The group fulfills this mission by providing a variety of support services that:

- facilitate communication and cooperation among member states and between the states and the US EPA; and
 - support the efficient sharing of state and federal program resources to help avoid duplication of effort and to facilitate development of regional approaches to solving critical environmental problems in the region.
-
- Manage NEWMOA resources efficiently and effectively to address state goals and priorities

NEWMOA FY 2009 Solid Waste Program Workplan

October 1, 2008 – September 30, 2009

Solid Waste Program

Overall Program Goals:

- Prioritize types of solid waste that are important to address regionally through policy and program coordination and information sharing
- Improve state understanding of the management and disposal of solid waste in the region
- Improve the management of high priority solid wastes, including construction and demolition debris
- Increase solid waste minimization, including recycling

Solid Waste Management & Reduction (funded by NEWMOA base grant)

Strategies:

- Keep the states informed about the flow of solid waste within and outside of the region to facilitate improved solid waste planning in the states
- Assist states with their solid waste planning activities
- Help the states improve the effectiveness of their solid waste programs by facilitating information sharing on program activities, successes, and challenges
- Develop consensus regarding regional priorities and strategies for regionally coordinated programs

FY 09 Activities:

- Manage Solid Waste Steering Committee – plan information sharing conference calls on three priority topics – increasing food waste diversion (residential?); producer responsibility policy leaders – what has been implemented and how is it working; and innovative MSW management technologies
- Manage Solid Waste Interstate Flow Workgroup and develop tables and graphs to illustrate 2007 calendar year data on interstate flow, if possible
- Manage Auto Recycling Networking Group and listserv
- Maintain solid waste section of the NEWMOA website

Anticipated FY 09 Outcomes:

- Identification of key solid waste management challenges facing state solid waste officials in the region
- Increased understanding by state solid waste staff of the solid waste management activities in neighboring states
- Improved knowledge about the flow of solid waste inside the region and to destinations outside of the region
- Improvements in data available to states for use in policy development
- Improvements in data reported to states from solid waste facilities

Beneficial Use Determinations (BUDs) (funded by a grant from EPA HQ)

Strategies:

- Keep the states informed about beneficial use determinations issued by individual states and BUDs technical and programmatic issues facing the states

FY 09 Activities:

- Assist the NEWMOA states with inputting their data to the NEWMOA BUDs database, particularly NY and NJ that have existing databases
- Assist the other 5 participating states with inputting their data into database, to the extent practical
- Perform national outreach on database – work with other states to input their data to make the NEWMOA BUD Database a national repository for BUD information
- Develop queries and reports to analyze data

Anticipated FY 09 Outcomes:

- Increased understanding by state solid waste staff of individual state BUDs, individual state criteria for issuing BUDs, programs activities, and challenges in the region through work to improve and update the NEWMOA online BUD database
- Improved technical and programmatic knowledge of BUDs so that states are better able to implement effective programs

Construction & Demolition Debris (funded by grant from EPA Regions 1 and 2)

Strategies:

- Develop effective multi-state strategies to improve C&D waste management and increase beneficial uses, particularly related to gypsum wallboard

FY 09 Activities:

- Manage C&D Workgroup to identify, review, and prioritize the possible regulatory and policy actions that states could implement to increase gypsum wallboard reuse and recycling
- Facilitate a series of interstate discussions, including holding at least one face-to-face meeting to identify a small subset of the possible strategies for which NEWMOA would develop implementation tool(s) such as model regulatory or policy language
- Solicit input from key stakeholders, including C&D processors and/or gypsum wallboard recyclers, on the potential actions on which states propose to focus
- Develop a common regional strategy to promote gypsum wallboard recycling that covers all three areas: encouraging an increase in the supply to recyclers; ensuring a consistent quality product in an environmentally responsible manner; and encouraging highest value end use(s).
- Support the involvement of the other NEWMOA-member states in C&D and Gypsum Wallboard Working Groups formed by the MassDEP

Anticipated FY 09 Outcomes:

- Increased understanding by state solid waste staff of the construction and demolition debris waste management programs, activities, and recycling market potential opportunities and challenges in the region
- Improved technical and programmatic knowledge of options for improving C & D waste management in the region so that states are better able to implement effective C & D programs
- Model regulatory and/or policy language to promote waste minimization, reuse and recycling of gypsum wallboard wastes

Agricultural Plastics Recycling (funded by US Department of Agriculture Grant)

The project's goals are to (1) raise awareness of recycling options, (2) promote best management practices in handling of agricultural plastics to maintain the quality needed for recycling, and (3) identify solutions to the agricultural plastics disposal problem in targeted rural areas.

Strategies:

- Conduct training and provide technical assistance to increase recycling of agricultural plastics in rural areas of four Northeastern states, Maine, New Hampshire, New York and Vermont.

FY 09 Activities:

- Collaborate with contractor (from Cornell University) on delivering training
- Hold approximately four workshops for rural communities on ag plastics and recycling
- Collaborate with contractor to provide direct assistance to key members of the agricultural community in local areas as a follow-up to the workshops
- Evaluate success of the workshops and technical assistance
- Expand project to the rest of the NEWMOA states

Anticipated FY 09 Outcomes:

- Increased understanding of opportunities and challenges associated with agricultural plastics recycling
- Efforts underway to increase ag plastics recycling in the region

NEWMOA FY 2009 Hazardous Waste Program & Common Measures Project
Workplan

October 1, 2008 – September 30, 2009

Hazardous Waste Program Coordination (funded by Base Grant from EPA Region 1-NE)

Strategies:

- Provide forums for discussion of EPA rulemaking issues and ensure that NEWMOA member state program views are communicated to the Agency
- Develop and implement training to meet state needs for staff skills and knowledge
- Help states to strategize and develop hazardous waste reduction activities
- Assist EPA in understanding state perspectives, needs, and issues with hazardous waste management
- Support continuing NEWMOA-EPA-DOT/RSPA dialogue on rulemaking
-

Activities:

- Complete HW component of FY 2009 NEWMOA Training Plan
- Implement plans to summarize highlights of web conferences/training calls and post on NEWMOA website
- Hold 8-10 monthly 1-2 hour HW Training web conferences/conference calls
- Hold annual one day live training conference at two locations.
- Hold conference calls and follow-up on one or more EPA rulemaking or policy issues that require NEWMOA response
- Survey states for training priorities for live training and web conferences/conference calls, hold conference calls to discuss priorities and build consensus, and develop HW component of Proposed FY 2010 NEWMOA Training Plan

Common Measures Project (funded by an EPA HQ Innovations Office Cooperative Agreement with MassDEP and implemented through a MassDEP -NEWMOA Contract for Support Services)

Strategies:

- Facilitate information sharing on Environmental Results Project and other innovative compliance activities of the states
- Coordinate efforts to develop and implement indicators of program success
- Coordinate efforts to communicate with EPA on the value and importance of these strategies
- Identify and explore opportunities for pollution prevention in permitting programs

Activities:

- Assist with completing presentation and evaluation of Common Measures Data
- Participate in/arrange meetings and calls determine next steps
- Develop and implement a plan to provide follow-up training and assistance to states
- Participate in completing project report and related presentations
- Provide administrative and staff support for states ERP Consortium
- Assist and support development of grant proposals for next steps

NEWMOA FY 2009 Waste Site Cleanup & Brownfields Workplan

October 1, 2008 – September 30, 2009

Voluntary Site Cleanup & Brownfields Redevelopment Program (funded by states through a contract from MA DEP)

Overall Program Goals:

- Improve the efficiency and effectiveness of waste site characterization at contaminated sites in the Northeast
- Improve the technical awareness of state waste site cleanup program staff on emerging issues
- Increase interstate coordination to improve state voluntary site cleanup and Brownfields programs

Strategy:

- Help states develop effective strategies for improving the effectiveness of voluntary site cleanups and redevelopment of Brownfields sites
- Develop training events that meet the technical priorities agreed by the states
- Increased understanding of EPA expectations of state programs in meeting the requirements of the Brownfields legislation, including measures of program success

FY 09 Activities:

- Work with states to develop training on priority waste site cleanup program issues needs and organize and hold at least three face-to-face workshops in FY 09 – tentatively: Hands-on Real Time Data Collection and Analysis in November 2008;

Contaminated Sediments in March 2009; and Vapor Intrusion Assessment in June 2009.

- Hold one states/EPA Brownfields meetings to discuss program implementation and grant requirements – work with states and EPA to determine when is most appropriate to hold the meeting, priority topics, and the meeting agenda
- Work with state waste site cleanup programs to identify additional priorities for coordination and assistance from NEWMOA on improving voluntary cleanup and Brownfields programs, and/or implementing the provisions of the Brownfields legislation
- Continue to coordinate training with Brown University’s program and organize participation in their events by states outside RI – and help them facilitate on-line registration
- Hold quarterly conference calls with the Waste Site Cleanup Program Directors prior to NEWMOA Director’s meetings to provide input to the NEWMOA Waste Site Cleanup Program Chair
- Maintain waste site cleanup section of the NEWMOA Website

Anticipated FY 09 Outcomes:

- Increased understanding of EPA expectations of state programs to meet the requirements of the Brownfields legislation
- Increased understanding of mechanisms to increase the long-term effectiveness of institutional controls at voluntary cleanup and Brownfields sites
- Increased understanding of priority technical issues through training workshops

MassDEP Oil Spill Act Program Support (funded by a contract with MA DEP)

FY 09 Activities:

- Re-negotiation of workplan occurring in September 2008
- Implement workplan

NEWMOA FY 2009 Assistance & Pollution Prevention Workplan

October 1, 2008 – September 30, 2009

Assistance & Pollution Prevention Program

Overall Program Goal:

- Enhance the capabilities of the state and local government environmental officials in the Northeast to implement effective multi-media source reduction and assistance programs to promote sustainability and improvement in public health and the environment

Strategies

- Increase adoption of pollution prevention (P2) approaches to addressing environmental problems
- Improving the collection and dissemination of pollution prevention information in the service provider community

- Increase the awareness, accessibility, and usability of P2 information
- Identify priority P2 technologies that state P2 program staff is interested in learning more about so that they can effectively promote these technologies to business
- Help states identify and prioritize industrial, business, and other sectors for regional coordination and information sharing
- Help states conduct more effective and efficient outreach and assistance to targeted priority sectors

Overall Regional Assistance & P2 Coordination (funded by grant from EPA Region 1)

FY 09 Activities:

- Manage NE Assistance & P2 Roundtable Steering Committee
- Implement 2008-2010 Strategic Plan for the A & P2 Roundtable
- Organize NE Assistance & P2 Roundtable web conferences (possible topics for web conferences include energy efficiency technologies, green chemistry, measurement, and nanotechnology)
- Publish two issues of the NE Assistance & P2 Newsletter
- Manage NE Assistance & P2 Roundtable Listserv, Hospitality Listserv, Green Building Listserv, Environmental Management Accounting Listserv, Marina Outreach Listserv; Integrated Chemicals Listserv,
- Conduct two surveys of the states to identify their A & P2 Priorities for FY 2009 and their training priorities to use to inform activities
- Manage Hospitality Workgroup and hold conference calls
- Manage Marina Outreach Workgroup and hold conference calls

Anticipated FY 09 Outcomes:

- Promote understanding of assistance and P2 programs priorities and activities among states in the region

NEWMOA FY 2009 PBT – Other Priority Chemicals Workplan

October 1, 2008 – September 30, 2009

Persistent, Bioaccumulative & Toxic (PBT) & Other Priority Chemicals Reduction Program

Overall Program Goals:

- Facilitate communication and information sharing about toxic substances in products and manufacturing and safer alternatives; in particular policy and legislative initiatives at the state and national level; health and environmental assessments of existing chemicals and alternatives; priority chemical identification and prioritization; and identification of state training needs
- Seek out areas of common interest and concern of the member states and identify potential projects, activities, and funding sources to assist states in program implementation
- As resources allow, develop and sponsor training for state programs, including web conferences and workshops

- Collaborate with other agencies and organizations outside of the NEWMOA membership that share an interest in reducing risk and exposure to toxic chemicals, including but not limited to academic institutions, non-governmental organizations, and public health agencies
- Help states identify effective strategies for promoting reductions in PBTs and other priority chemicals and work on prioritizing solid and hazardous wastes that have persistent, bioaccumulative, and toxic (PBT) constituents
- Help states reduce the waste streams in the region that contain key persistent, bioaccumulative and toxic (PBT) pollutants, particularly mercury and lead
- Help states improve the management of wastes that contain mercury

Safer Chemicals Workgroup

Strategies

- Facilitate communication and information sharing
- Seek out areas of common interest and concern and identify potential projects and funding sources
- Develop and sponsor training for state programs
- Collaborate with other agencies and organizations

FY 09 Activities

- Hold 3-4 Workgroup conference calls
- Monitor state legislative developments and develop a summary
- Identify training needs and opportunities and organize one workshop
- Identify projects for Board approval and funding

Mercury Reduction (funded by IMERC member states dues, EPA HQs grant to analyze IMERC data)

Strategies:

- Help states reduce mercury products in the waste stream; where that is not feasible establish a comprehensive collection system for mercury products
- Help states establish effective mercury reduction programs by sharing information on program activities, successes, and challenges
- Help states increase fluorescent lamp recycling

FY 09 Activities:

NEWMOA Mercury Workgroup

- Manage Mercury Policy, Legislation, and Regulations listserv
- Continue to expand the mercury reduction programs database with support from the Regional P2Rx Centers
- Plan and hold mercury science and policy conference
- Maintain and expand mercury section of the NEWMOA website
- Assist the Quick Silver Caucus with implementing recommendations on priorities for action on mercury product reductions and state actions
- Assist NE Governors' Mercury Task Force with implementing action plan

Overall IMERC Management

- Manage Interstate Mercury Education and Reduction Clearinghouse (IMERC)
- Organize two full IMERC conference calls and elect Chair and Vice Chair during the September call
- Prepare a grant proposal for EPA to support conversion to online filing of Notification Forms
- Prepare and track IMERC state dues invoices and other funding sources

IMERC Notification Committee

- Address compliance assistance requests from facilities regulated under state mercury reduction laws that include Notification requirements
- Facilitate review of IMERC Mercury-added Product Notification Forms and hold approximately 12 conference calls of the IMERC Notification Subcommittee
- Draft approval and comment letters for review by the states and, once finalized, send to reporting entities
- Send letters to companies suspected of being out-of-compliance with Notification requirements
- Manage and populate the Mercury-Added Products Database with the 2007 data
- Finish updating and improving Mercury-Added Products Database architecture
- Develop reporting features that will enable more rapid retrieval of information from the Mercury-Added Products Database
- Maintain and update guidance on IMERC-member state product notification requirements on the IMERC webpage

IMERC Labeling Committee

- Address compliance assistance requests from facilities regulated by state product labeling requirements
- Share Alternative Labeling Plan Applications with the IMERC Labeling Committee
- Maintain and update guidance on IMERC-member state product labeling requirements on the IMERC webpage

IMERC Product Bans, Phase-outs & Collection Plans

- Address compliance assistance requests from companies that are regulated by state mercury product bans, phase-outs, and collection plan requirements
- Send out Mercury-added Product Phase-out Exemption Applications to the appropriate states and maintain files of the Applications
- Facilitate review of IMERC Mercury-added Product Phase-out Exemption Applications and hold approximately 4-6 conference calls of the IMERC Phase-out Subcommittee
- Maintain and update guidance on IMERC-member state product bans on the IMERC webpage
- Maintain and update Phase-out Exemption Application Form and Instructions on the IMERC webpage

IMERC Enforcement Committee

- Provide support upon request from the states on their efforts to enforce their mercury

- reduction requirements
- Convene approximately 3 conference calls of the state IMERC Enforcement Committee
- Coordinate state enforcement efforts related to mercury product reduction requirements

IMERC Education and Outreach

- Maintain overall IMERC webpage
- Develop and publish one issue of IMERC Alert
- If necessary, update the IMERC brochure and post on the IMERC webpage

Promote Lamp Recycling

- Explore opportunities for collaboration with energy efficiency organizations on promoting lamp recycling
- Facilitate the Lamp Recycling Workgroup and hold approximately 4 conference calls
- Manage Lamp Recycling Outreach Listserv
- Maintain lamp recycling webpage on NEWMOA website
- Seek funding to support Lamp Recycling initiative

Anticipated FY 09 Outcomes:

- Increased understanding by state waste management officials of the trends in the mercury content of products sold in the region
- Improved technical and programmatic knowledge of options for improving mercury-containing waste management in the region
- Increased collection and recycling of mercury-added products in the region
- Coordinated approaches to passage and implementation of mercury product legislation

Lead Reduction (funded by P2Rx grant)

Strategies:

- Identify key sources of lead in waste
- Present available information on pollution prevention options for lead in products/waste

FY 09 Activities:

- Maintain the Lead Topic Hub on the NEWMOA website, focus on general information on lead and on reduction opportunities for lead in wire and cable

Anticipated FY 09 Outcomes:

- Increased knowledge by state solid waste staff of the opportunities for reducing regional sources of lead in waste
- Increased ability of the states to implement programs to promote alternatives to lead in products

Appendix B

Procedures & Policies of the IMERC Notification Committee

Updated July 2007

This document outlines those procedures and policies of the IMERC Notification Committee to help clarify for all participants how the Committee operates and to guide its decision-making process. The Committee will periodically update and amend this material to reflect its ongoing decisions about Mercury-added Product Notification. These procedures and policies cover the routine activities of the IMERC Notification Committee. Unique cases and situations may arise that would require that the Committee develop alternative procedures and policies. The Committee will document these cases and use those situations to amend this guidance.

OVERVIEW OF THE IMERC NOTIFICATION COMMITTEE PROCEDURES

Formation of the IMERC Notification Committee:

- States involved in the IMERC Notification Committee are those that have enacted Mercury Product Notification requirements for manufacturers and distributors of mercury-added products. These states currently include: Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont.
- IMERC Notification Committee consists of designated representatives from the participating state environmental agencies. Each state typically designates one representative and one back-up, although some states choose to have more than one active representative.
- Each year IMERC elects a chair and vice chair, one of whom signs letters to companies and organizations that submit the Mercury-added Product Notification Forms. The vice chair takes over as chair the following year.
- The state agencies inform IMERC staff of their designated IMERC Notification Committee representative through a letter, e-mail, or phone call from those delegated by the state environmental agency Commissioner as the official representative of IMERC.
- Upon designation of a representative from a state for the IMERC Notification Committee, the IMERC staff adds that person to the e-mail address list and other Committee lists and includes that state representative in all future correspondence regarding Mercury-Added Product Notification.

- IMERC shares a copy of this Mercury-Added Product Notification guidance material on the procedures and policies with all members of the IMERC Notification Committee as a reference document for future deliberations.

Management of the Mercury-Added Product Notification Forms in the IMERC Clearinghouse:

- The IMERC Notification Committee develops the Mercury-Added Product Notification Form, their associated instructions and sample forms. The Form and instructions are periodically reviewed and updated by the Committee.
- NEWMOA posts the Mercury-Added Product Notification Form and instructions on the IMERC webpage in a variety of electronic formats to facilitate compliance by the reporting organizations and manufacturers.
- IMERC has established hard copy master file of all of the hard copy Notification Forms received by the Clearinghouse or the participating states.
- When IMERC receives a Mercury-Added Product Notification Form from a manufacturer, reporting organization (i.e., importer, distributor, and wholesaler), or trade organization, the staff makes copies of the file for the members of the Notification Committee and files the original in the appropriate locations.

Mercury-Added Product Notification Form Review Steps:

NOTE: When IMERC receives Notification Forms requesting confidential business information (CBI) waivers, it forwards the Forms directly to the participating state agencies. It also informs the manufacturer/reporting organization that it cannot accept Notification Forms that contain confidential business information and that any information in IMERC's files is available to the public.

- When IMERC receives Mercury-Added Product Notification Forms from manufacturers, reporting organization (i.e., importers, distributors, wholesalers), or trade organizations, the staff makes a copy of them for each member of the IMERC Notification Committee and sends them as a batch to the Committee members two weeks prior to the group's next conference call.
- IMERC staff set the date/time of the Notification Committee conference calls at a time that is convenient for the members of the Committee; the staff confers with the Committee on setting these dates/times.
- A few working days prior to the conference calls, the IMERC staff sends out at least one reminder via e-mail to the Notification Committee about the conference call, which outlines the agenda for the call, lists the Notification Forms that will be discussed and the lead reviewer for the Form, and includes the call-in number and access code.
- In between IMERC Notification Committee conference calls, IMERC staff corresponds with the Committee on issues and questions that arise, primarily via e-mail.

- IMERC staff facilitate the Notification Committee conference calls by reviewing the agenda during the beginning of the call, ensuring that the agenda topics are covered during the call, keeping the discussion on track, and preparing notes on the results of the calls. IMERC staff also provides background information or reference to prior determinations, if appropriate during the calls. At the decisions points during the call, the IMERC staff ensures that all of the states are in agreement with the decision. The IMERC Notification Committee decisions are made by consensus—in this case “consensus” means that the state representatives agree with the decision or determined it is not contrary to their specific state laws and are able to accept as part of the IMERC one-stop process. While IMERC staff facilitates the calls, they are not involved in its decisions. If possible during the conference calls, the Committee sets a time/date for its next call.
- IMERC staff prepares the draft notes on the results of each conference call and sends those out for review and concurrence by the Notification Committee. These conference call notes focus on the decisions of the group and its next steps. IMERC staff updates call notes with subsequent email correspondence when relevant to the decisions made during the call.
- After the IMERC staff prepares the draft notes for the conference call and sends them to the Notification Committee for their review, they draft the follow-up letters and other correspondence.

Correspondence with Manufacturers and Reporting Organizations:

- After the IMERC Notification Committee has reviewed a Mercury-Added Product Notification Form and made a determination about its acceptability or the changes that are needed on the Form, IMERC prepares a draft letter to the company/organization that submitted the Form.
- For all newly submitted Forms, IMERC prepares either a formal “Completion” aka “Approval” letter or “Comment” letter in response.
- Attachment A contains sample “Completion” or “Approval” letters that IMERC sends to firms whose Notifications Form satisfies the requirements of the participating states. The IMERC staff drafts all completion letters and sends them out to the Notification Committee for their review and concurrence. These letters acknowledge the receipt of the Form, list the states that have participated in its review, describe the requirement to submit an updated Mercury-Added Product Notification Form if the manufacturer changes the mercury content of its products or some other information on the Form, and notes the requirement and deadline to re-submit the Triennial Update Form. These letters are signed by the Chairperson of the IMERC Notification Committee, and cc’d to the members of the IMERC Notification Committee. The Chairperson is removed from the cc list.
- The Notification Committee can find a Form deficient for any of the following reasons: missing information, inconsistent information, data appears to be incorrect, confusion on the Form about what is required, product labeling information that does not include the required Notification information, unclear or

- insufficient product categories, inability to determine from the Form what products contain mercury, and other problems as determined by the Committee.
- If the Committee finds that a Form is deficient, they outline what the company/organization must do to address the deficiency during the conference call. These issues are outlined in the summary notes of the group's conference call.
 - The IMERC staff prepares a letter outlining the Committee's comments on the Notification Form and requesting that the reporting organization or manufacturer make the changes and submit a revised Form or the missing information in a letter or e-mail. If the requested corrections are very minor, IMERC staff may call or e-mail the company/organization with the question. Attachment E contains examples of these "comment" letters. The comment letters include a statement acknowledging receipt of the Notification Form, a list of the states involved in reviewing it, a description detailing the deficiencies with the Form as it was submitted, and a contact person for more information. The letters provide a one month deadline for submission of the corrected or additional information. These letters are signed by the Chairperson of the IMERC Notification Committee. They are first sent via e-mail to the reporting company or hard copy mail if no email address is available for the company contact person. All of these letters are cc'd to the members of the IMERC Notification Committee. The Chairperson is removed from the cc list.
 - If after receiving a response to the IMERC Notification Committee's comment letter, the group still needs further clarification or additional information, in most cases the IMERC staff sends an e-mail or places a phone call to the company or organization's contact person to directly discuss the problem with the Form. The e-mail is cc'd to the IMERC Notification Committee, and the response is forwarded to the group as well. The IMERC staff takes notes on the results of any phone conversations and reports on their results to the Committee via e-mail or during its next conference call.
 - On some occasions, the IMERC Notification Committee may choose to send another formal letter to request further clarifications or additional information after the reporting organization has responded to the comment letter. The IMERC staff drafts these letters and sends them out for approval by the full Committee. The letters provide a one month deadline for submission of the corrected or additional information. These letters are signed by the Chairperson of the IMERC Notification Committee. They are cc'd to the members of the IMERC Notification Committee. The Chairperson is removed from the cc list.
 - If the reporting organization or manufacturer fails to respond to the first "comment" letter within the timeframe provided, the IMERC staff prepares a follow-up letter or "second comment" letter with stronger language that indicates that the Clearinghouse plans to refer the matter to the member states for possible enforcement action if the company/organization fails to respond within a one month timeframe. Attachment F contains examples of these "second comment" letters. These second comment letters include a copy of the original letter that was sent. They repeat the detailed request for clarification or additional information that was explained in the first comment letter. These letters are

- signed by the Chairperson of the IMERC Notification Committee. They are cc'd to the individual at the company/organization who certified the original Form and to the IMERC Notification Committee. The Chairperson is removed from the cc list. The letters are mailed via certified/return receipt mail to create a paper trail that demonstrates that the reporting firm received the letter.
- If a reporting organization/manufacture does not respond to this second comment letter, IMERC refers the matter to the member states for their consideration of what enforcement action to undertake. The Notification Committee discusses these cases during its conference calls and coordinates on the state responses. In general, the individual states follow-up with a strongly worded letter and cc IMERC and the other states on these letters. Sometimes these letters are drafted and sent by IMERC.
 - IMERC staff keeps copies of all of the correspondence—completion letters, comment letters, and e-mails—in the file for each reporting organization or manufacturer.

Mercury-Added Product Database:

- The IMERC Notification Committee has worked with the IMERC staff to design a web-based database that presents the information from the Mercury-Added Product Notification Forms. The purpose of this database is to provide public access to information on mercury-added products and their manufacturers. The primary audiences for this database are: policy makers in the states who are interested in identifying opportunities for mercury reduction, state and local solid waste managers who are interested in identifying products to collect and separate from the waste stream, solid waste management industry officials, manufacturers interested in the mercury content of products, advocacy groups, and interested members of the public who want to know more about what products contain mercury. The Mercury Products Database is available on the NEWMOA website on the IMERC Web page.
- The database is also designed to enable the IMERC Notification Committee to track the status of each Notification Form that is submitted. This tracking function is available to members of the Committee only and is not available in the public version of the database.
- When a reporting organization or manufacturer submits a Mercury-Added Product Notification Form, the IMERC staff adds the information on that company's name, address, phone number, fax number, contact person and their title, web site, and e-mail address to the Mercury-Added Product Database.
- As the IMERC Notification Committee reviews and processes the Forms, the IMERC staff uses the database to track those activities and to keep track of the status of each submission.
- After Mercury-Added Product Notification Form has been approved by the IMERC Notification Committee and a "completion" letter is sent, the IMERC staff adds the data on the mercury content of the products and the total mercury from the Form to the Mercury-Added Product database.

- Once all of the data from the Form is added to the database and the IMERC staff has completed a quality assurance check to make sure there are no mistakes, the staff sends an e-mail or a letter (if no e-mail address is available) to the contact at the reporting organization or manufacturer to ask them to review the data and submit any corrections or changes. The e-mail or letter allows them one month to review the information and submit corrections or updates.
- After the deadline for submitting corrections or updates to the database is past, the IMERC staff makes the corrections or updates to the database and posts the full data on the public version of the database.

MERCURY-ADDED PRODUCT NOTIFICATION POLICIES DEVELOPED BY THE IMERC NOTIFICATION COMMITTEE

This section of this guidance paper provides a section-by-section outline of the policies that the IMERC Notification Committee has developed to guide its review of the Mercury-Added Product Notification Forms.

General Policies:

- IMERC accepts only original copies of the Mercury-Added Product Notification Form and not electronic or fax versions. This is to ensure that the signature on the Certification statement is authentic. Corrections to the Forms and supplemental information may be submitted by fax or email.
- Some of the companies that complete and submit the Form are confused about the differences between the Notification requirement and the labeling requirement that is in effect in a number of states. In these cases, the companies have sent IMERC copies of their certified labeling plans or other related information. These materials are not substitutes for the Notification Form and the IMERC Notification Committee corresponds with these companies to clarify the differences between these requirements and what they need to do to comply with the Notification requirements.

Mercury-Added Product Notification Form

NOTE: Attachment G of this document also contains a checklist for reviewing a company's Mercury-Added Product Notification Form(s).

Section II & III: Reporting Organization & Product Manufacturer Information:

- Occasionally there is confusion about the difference between the Reporting Organization and the Product Manufacturer. They can be the same company, in which case they should indicate this by checking the appropriate designation. If the Reporting Organization is a distributor, importer, or wholesaler and therefore not the product manufacturer, they must complete the information requested in

Sections II and III and provide the required information on the Product Manufacturer.

- Some companies do not have websites or e-mail addresses. If the reporting organization or the manufacturer indicates that they do not have either of these electronic communications system available, then this information is left blank in the database.
- Occasionally there is confusion about the name of the manufacturer because some manufacturers have very similar names or there are multiple divisions within the same company that produce different products and submit separate Forms. In these cases, the Committee gets back to the contact at the company to ensure that they are clear about who the manufacturer is and their relation to other manufacturers with similar or the same names.

Section IV: Certification:

- The Certification must be signed by a senior management official at the reporting organization or manufacturer with a date of the signature. The name and title of the authorized senior management official must also be legibly type-written or hand-written so that the name and title is clear for the Committee.
- The IMERC Committee will not accept any Form that is not certified by a senior management official from the reporting company or the manufacturer.
- In the case of Forms submitted by trade organizations, the organization must submit a signed statement by each of the firms that it represents demonstrating that they have authorized and approved the information submitted by the trade group. This is included with the Mercury-added Product Notification Form that has been designed specifically for use by trade groups.

Section V: Product Information Table:

Part (1) – Product or Category of Products that YOU Manufacture, Distribute or Import:

- Some of the companies completing the Table are confused about how to define a Product or Product Category. The definitions for fabricated product and product category are included in the Instructions to the Forms, and the Committee frequently refers to those instructions when questions come up. The important aspect of defining a product or product category is whether it helps the Committee and ultimately the user of the Mercury Products Database to distinguish among products that are mercury-added and those that are not. For example, the product categories, toys and watches, are too broad because there are many toys and watches that do not contain mercury or mercury-added components. The product category designations must be specific enough to determine which toys or watches are the mercury-added ones. The Committee has been willing to work with manufacturers and their representatives to better define and clarify the appropriate product or product categories for them to use. In some cases the easiest and most clear way for companies to define their products and product categories is through the use of model numbers. In other cases, there are some simple adjectives or terms that can be used to adequately describe the products.

In the examples listed above, the toy manufacturers have used product categories that focus on the type of toy, such as a doll or action figure, and what the mercury-added component (i.e., button cell battery or lamp) does in the item, including making the toy move, light up, or make sound.

- In addition to ensuring that the Product Categories have some clear consistency, the IMERC Notification Committee requests that products with similar functions also be grouped by their mercury content in the same Product Category. The Committee requests that products included in a Product Category have similar amounts of mercury. Therefore, the Committee asks companies to differentiate products whose mercury content falls in different ranges provided on the Form (i.e., >0-5 mg, >5-10 mg, >10-50 mg, >50- 100 mg, >100-1000 mg, >1000 mg), whether reporting by a range or an exact amount. The Committee also sends letters to firms inquiring about cases where they report on products that appear to be the same or similar but have different mercury content. For example, watch manufacturers have reported that some of the button cell batteries that they use in their watches have >0-5 mg and others have >5-10 mg of mercury. The Committee asks the manufacturers to explain why they use button cell batteries with differing amounts of mercury in their products. Based on the results of the conversation with the manufacturers/reporting organization, the Committee may define similar products that contain components with different amounts of mercury to be in different product categories. In the example of the watch, the watches with button cell batteries that contain >0-5 mg of mercury would be considered as a different product category from those with >5-10 mg.
- Some of the manufacturers have chosen to report both Product Categories and Sub-Categories. For example, the Electronics Industry Alliance has reported for its members using the Product Category “Flat Panel (LCD) Display TV” and then breaks that Category down into five Product Subcategories based on the size and other characteristics of the products. The IMERC Notification Committee has found this to be an acceptable way to report the information.
- The IMERC Notification Committee has also negotiated with manufacturers and trade organizations to develop Product Categories that are acceptable and respond to the unique characteristics of different types of products.

Part (2) – Description and Location of Mercury-Added Components Contained in the Product (if applicable):

- The IMERC Notification Committee has accepted brief descriptions of the Mercury-added components and their location. However, they have required that these descriptions be clear enough so that they have a basic understanding of what the product and its components are and where they occur in the product.

Part (3) – Number of Each Component in One Unit of the Larger Product (if applicable):

- For some products, the mercury-added components (i.e., lamps) are an option. The IMERC Notification Committee has accepted Forms that indicate this.

- For some products, there can be a range in the number of mercury-added components (e.g., Explorer RVs can contain 1-3 lamps). The IMERC Notification Committee has accepted Forms that indicate what this covers.

Part (4) – Amount of Mercury (include unit of measure):

- In cases where there is a product that has more than one mercury-added component (i.e., multiple switches, batteries, lamps, or some combination of these) some reporting organizations and manufacturers are confused about whether to report on the amount of mercury in each component of the larger product or the combined amount of mercury in all of the components. The Form requests data on the amount of mercury in each component in the product.
- The Form specifically requests information to be reported in milligrams or parts per million. Some firms have reported the mercury content in ounces or pounds, as a percent concentration, or as a volume (i.e., milliliters or micro liters) or some other unit of measure. The IMERC Notification Committee accepts Forms that report on the mercury content in ounces or pounds because these quantities can be converted into grams. The Committee has not accepted Forms that report on the mercury content as a volume or percent concentration because it cannot convert this measurement into milligrams or parts per million.

Part (5) – How Amount of Mercury is Reported (R or E):

- The IMERC Notification Committee will only accept mercury amount reports as exact (E) amounts or as ranges (i.e., >0-5 mg, >5-10 mg, >10-50 mg, >50- 100 mg, >100-1000 mg, >1000 mg). The group will not accept a Form that reports on the average amount of mercury, because this is contrary to law in some states.

Part (6) – Purpose for Mercury in the Component (or Product):

- The IMERC Notification Committee has accepted very broad and short explanations for the “purpose of the mercury in the component (or product)” and has not insisted on a great deal of specificity or technical descriptions.

Part (7) – Total Amount of Mercury in all Units Sold by Product or Product Category (reported in grams):

- Some reporting organizations and manufacturers have been confused about whether to report on the mercury used in the products sold in the states that require the Notification Form, for all of their the products sold worldwide, or for those products they sold in the US. The requirement is for the products sold in the US; the first reporting year is 2001 (Forms were due in April 2002), the first triennial reporting year was 2004 (Forms were due in April 2005) and the next triennial reporting year will be 2007 (Forms will be due April 2008).
- Total amount of mercury should be reported for each product and/or product category listed in the Notification. Some reporting organizations or

manufacturers have reported totals for each component in each product or product category, but this is not required.

- Some firms have reported the total amount of mercury as a range and this is not acceptable. The IMERC Notification Committee will not accept a Form that reports on the total amount of mercury as a range.

Attachment A: Sample Completion Letter

Approval Letter

{Date}

{Contact Name}

{Company}

{Address}

Subject: Mercury-Added Product Notification Form

Dear Mr./Ms. { Contact Name }:

Environmental agency representatives from the states of Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont (the States) have reviewed the materials you submitted under the Mercury-Added Product Notification requirements. This review was facilitated by the Interstate Mercury Education and Reduction Clearinghouse (IMERC). The information provided in the Mercury-Added Product Notification Form, dated **{Date}**, for {Company} **satisfies** the States' Mercury-Added Product Notification requirements.

Please note that you are required to submit an updated Mercury-Added Product Notification Form if there is a change in the information provided, or by April 1, 2008, if no changes occur before then. Information on total mercury in products for 2007 will be due by April 1, 2008.

Thank you for complying with the States' Mercury-Added Product Notification requirements. Please contact Adam Wienert at (617) 367-8558 x307 or awienert@newmoa.org if you have any questions.

Sincerely,

{Insert Electronic Signature}

{Name and State of Chairperson}

IMERC Chairperson

cc: Tom Metzner, CT DEP
Lori Segall, MA DEP
Peter Pettit, NYS DEC
Karen Knaebel, VT DEC

Enid Mitnik, ME DEP
Stephanie D'Agostino, NH DES
Beverly Migliore, RI DEM

Attachment B: Component Manufacturer First Letter

“Need to Notify” Announcement Letter

{Date}

{Contact Name}

{Component Manufacturer}

{Address}

Dear Mr./Ms. {Contact Name}:

We understand that you are a manufacturer, importer, or distributor of a product that contains intentionally-added mercury or a mercury component. The Interstate Mercury Education and Reduction Clearinghouse (IMERC) has been authorized and directed by its member state environmental agencies to provide a single point of contact for the manufacturers, distributors, or importers of mercury-added products to facilitate compliance with the states’ laws concerning mercury-added products.

A major provision of the mercury reduction legislation enacted in Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont (the States) requires that a Mercury-Added Product Notification Form be filed before any mercury-added product is offered for sale or distribution in these jurisdictions. For the purpose of the notification requirements, a mercury-added product is any formulated or fabricated product that contains mercury, a mercury compound, or a component containing mercury, in which the mercury is intentionally added to the product (or component) for any reason.

The deadline for submission of this information has passed. Please complete and submit the required Notification Form by {1 month from letter date}. If the required information is not submitted by this date, IMERC will refer the matter to the participating states for continued follow-up and possible enforcement.

IMERC has posted Mercury-added Product Notification Forms and Instructions for manufacturers to use to comply with the notification requirement at the following website: www.newmoa.org/prevention/mercury/imerc.cfm. The use and submission of these Forms to IMERC can satisfy compliance with the Notification requirements in the States. The Instructions explain in detail exactly who must comply with these requirements and how to complete the Form. Notification Forms can be filed through IMERC or with each individual state.

IMERC is a program of the Northeast Waste Management Officials’ Association (NEWMOA). NEWMOA is a nonprofit, nonpartisan interstate association. Membership is composed of state environmental agency directors of the hazardous waste, solid waste, waste site cleanup, pollution prevention, and underground storage tank programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NEWMOA was established by the governors of the New England

states as an official interstate regional organization in accordance with Section 1005 of the Resource Conservation and Recovery Act (RCRA). The member states of the NEWMOA created IMERC to facilitate interstate implementation of the Notification and other provisions of the mercury education and reduction legislation, and to provide a single point of contact for the public and manufacturers.

If you do not have internet access, IMERC can fax or mail a copy of the Notification Form and Instructions to you. Call Adam Wienert at 617-367-8558 x307, and he will make sure you receive the appropriate information. Please do not hesitate to contact IMERC if you have any questions or need more information about the mercury-added product legislation in the Northeast.

Thank you.

Sincerely,

{Insert Electronic Signature }

{Name and State of Chairperson }
IMERC Chairperson

Please Note: *As part of the mercury reduction legislation, Connecticut, Maine, Massachusetts, Minnesota, New York, Rhode Island, Vermont, and Washington State have passed legislation requiring that certain mercury-added products have a label indicating that there is mercury in the product and that it must be managed properly. For labeling requirements in these states, see contact information below.*

More detailed information on state mercury reduction requirements is available at the following websites:

California – <http://www.dtsc.ca.gov/HazardousWaste/Mercury/index.cfm>

Connecticut – www.dep.state.ct.us/wst/mercury/mercury.htm

Maine – www.maine.gov/dep/mercury/products.htm

Massachusetts – www.mass.gov/dep/toxics/priorities/priorities.htm#hgresults

Minnesota – www.pca.state.mn.us/oea/

New Hampshire – www.des.state.nh.us/nhppp/mercury.htm

New York – www.dec.state.ny.us/website/dshh/redrecy/mercury.htm

Rhode Island – www.dem.ri.gov/topics/mercury.htm

Washington – www.ecy.wa.gov/mercury/index.html

Vermont – www.mercvt.org

cc: Tom Metzner, CT DEP
Enid Mitnik, ME DEP
Stephanie D'Agostino, NH DES
Beverly Migliore, RI DEM
Maria Victoria Peeler, WA DEC

Lori Segall, MA DEP
John Gilkeson, MN PCA
Peter Pettit, NYS DEC
Karen Knaebel, VT DEC
Jay Cross, CA DTSC

Attachment C: Component Manufacturer Second Letter
“Need to Notify” Second Announcement Letter

{Date}

{Contact Name}

{Component Manufacturer}

{Address}

Dear Mr./Ms. {Contact Name}:

We understand that you are a manufacturer, importer, or distributor of a product that contains intentionally-added mercury or a mercury component. **This is the second letter we have sent to you to inform you about requirements under state legislation in Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont (the States) that must be met before you can sell or distribute your products in the States.** The Interstate Mercury Education and Reduction Clearinghouse (IMERC) has been authorized and directed by its member state environmental agencies to provide a single point of contact for the manufacturers, distributors, or importers of mercury-added products to facilitate compliance with the states’ laws concerning mercury-added products.

A major provision of the mercury reduction legislation enacted in the States requires that a Mercury-Added Product Notification Form be filed before any mercury-added product is offered for sale or distribution in these jurisdictions. For the purpose of the notification requirements, a mercury-added product is any formulated or fabricated product that contains mercury, a mercury compound, or a component containing mercury, in which the mercury is intentionally added to the product (or component) for any reason.

The deadline for submission of this information has passed. Please complete and submit the required Notification Form by {1 month from letter date}. If the required information is not submitted by this date, IMERC will refer the matter to the participating states for continued follow-up and possible enforcement.

IMERC has posted Mercury-added Product Notification Forms and Instructions for manufacturers to use to comply with the notification requirement at the following website: www.newmoa.org/prevention/mercury/imerc.cfm. The use and submission of these Forms to IMERC can satisfy compliance with the Notification requirements in the States. The Instructions explain in detail exactly who must comply with these requirements and how to complete the Form. Notification Forms can be filed through IMERC or with each individual state.

IMERC is a program of the Northeast Waste Management Officials’ Association (NEWMOA). NEWMOA is a nonprofit, nonpartisan interstate association. Membership is composed of state environmental agency directors of the hazardous waste, solid waste,

waste site cleanup, pollution prevention, and underground storage tank programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NEWMOA was established by the governors of the New England states as an official interstate regional organization in accordance with Section 1005 of the Resource Conservation and Recovery Act (RCRA). The member states of the NEWMOA created IMERC to facilitate interstate implementation of the Notification and other provisions of the mercury education and reduction legislation, and to provide a single point of contact for the public and manufacturers.

If you do not have internet access, IMERC can fax or mail a copy of the Notification Form and Instructions to you. Call Adam Wienert at 617-367-8558 x307, and he will make sure you receive the appropriate information. Please do not hesitate to contact IMERC if you have any questions or need more information about the mercury-added product legislation in the Northeast.

Sincerely,

{Insert Electronic Signature }

{Name and State of Chairperson }
IMERC Chairperson

Please Note: *As part of the mercury reduction legislation, Connecticut, Maine, Massachusetts, Minnesota, New York, Rhode Island, Vermont, and Washington State have passed legislation requiring that certain mercury-added products have a label indicating that there is mercury in the product and that it must be managed properly. For labeling requirements in these states, see contact information below.*

More detailed information on state mercury reduction requirements is available at the following websites:

California – <http://www.dtsc.ca.gov/HazardousWaste/Mercury/index.cfm>

Connecticut – www.dep.state.ct.us/wst/mercury/mercury.htm

Maine – www.maine.gov/dep/mercury/products.htm

Massachusetts – www.mass.gov/dep/toxics/priorities/priorities.htm#hgresults

Minnesota – www.pca.state.mn.us/oea/

New Hampshire – www.des.state.nh.us/nhppp/mercury.htm

New York – www.dec.state.ny.us/website/dshh/redrecy/mercury.htm

Rhode Island – www.dem.ri.gov/topics/mercury.htm

Washington – www.ecy.wa.gov/mercury/index.html

Vermont – www.mercvt.org

cc: Tom Metzner, CT DEP
Enid Mitnik, ME DEP
Stephanie D’Agostino, NH DES
Beverly Migliore, RI DEM
Maria Victoria Peeler, WA DEC

Lori Segall, MA DEP
John Gilkeson, MN PCA
Peter Pettit, NYS DEC
Karen Knaebel, VT DEC
Jay Cross, CA DTSC

Attachment D: Suspected Component Manufacturer Letter

“Suspected Need to Notify” Announcement Letter

{Date}

{Contact Name}

{Component Manufacturer}

{Address}

Dear Mr./Ms. {Contact Name}:

If you are a manufacturer, importer, or distributor of any product that contains intentionally-added mercury, there are requirements in Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont (the States) that must be met before you can sell or distribute your products in these states. We are writing to inform you that we have been authorized and directed by the state environmental agencies to provide a single point of contact for the manufacturers, distributors, and importers of mercury-added products to facilitate compliance with these state requirements. This effort is being managed through the Interstate Mercury Education and Reduction Clearinghouse (IMERC), under the auspices of the Northeast Waste Management Officials’ Association (NEWMOA).

If you are not a manufacturer, importer, or distributor of a product that contains intentionally-added mercury, please complete the enclosed Certification Form and return it to IMERC immediately so that there is a written record and your name can be removed from the mailing list.

A major provision of the mercury reduction legislation enacted in the States requires that a Mercury-Added Product Notification Form be filed before any mercury-added product is offered for sale or distribution in these jurisdictions. For the purpose of the notification requirements, a mercury-added product is any formulated or fabricated product that contains mercury, a mercury compound, or a component containing mercury, in which the mercury is intentionally added to the product (or component) for any reason.

The deadline for submission of this information has passed. Please complete and submit the required Notification Form by {1 month from letter date}. If the required information is not submitted by this date, IMERC will refer the matter to the participating states for continued follow-up and possible enforcement.

IMERC has posted Mercury-added Product Notification Forms and Instructions for manufacturers to use to comply with the notification requirement at the following website: www.newmoa.org/prevention/mercury/imerc.cfm. The use and submission of these Forms to IMERC can satisfy compliance with the Notification requirements in the States. The Instructions explain in detail exactly who must comply with these

requirements and how to complete the Form. Notification Forms can be filed through IMERC or with each individual state.

IMERC is a program of the Northeast Waste Management Officials' Association (NEWMOA). NEWMOA is a nonprofit, nonpartisan interstate association. Membership is composed of state environmental agency directors of the hazardous waste, solid waste, waste site cleanup, pollution prevention, and underground storage tank programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NEWMOA was established by the governors of the New England states as an official interstate regional organization in accordance with Section 1005 of the Resource Conservation and Recovery Act (RCRA). The member states of the NEWMOA created IMERC to facilitate interstate implementation of the Notification and other provisions of the mercury education and reduction legislation, and to provide a single point of contact for the public and manufacturers.

If you do not have internet access, IMERC can fax or mail a copy of the Notification Form and Instructions to you. Call Adam Wienert at 617-367-8558 x307, and he will make sure you receive the appropriate information. Please do not hesitate to contact IMERC if you have any questions or need more information about the mercury-added product legislation in the Northeast.

Sincerely,

{Insert Electronic Signature}

{Name and State of Chairperson}
IMERC Chairperson

Please Note: *As part of the mercury reduction legislation, Connecticut, Maine, Massachusetts, Minnesota, New York, Rhode Island, Vermont, and Washington State have passed legislation requiring that certain mercury-added products have a label indicating that there is mercury in the product and that it must be managed properly. For labeling requirements in these states, see contact information below.*

More detailed information on state mercury reduction requirements is available at the following websites:

California – <http://www.dtsc.ca.gov/HazardousWaste/Mercury/index.cfm>

Connecticut – www.dep.state.ct.us/wst/mercury/mercury.htm

Maine – www.maine.gov/dep/mercury/products.htm

Massachusetts – www.mass.gov/dep/toxics/priorities/priorities.htm#hgresults

Minnesota – www.pca.state.mn.us/oea/

New Hampshire – www.des.state.nh.us/nhppp/mercury.htm

New York – www.dec.state.ny.us/website/dshh/redrecy/mercury.htm

Rhode Island – www.dem.ri.gov/topics/mercury.htm

Washington – www.ecy.wa.gov/mercury/index.html

Vermont – www.mercvt.org

cc: Tom Metzner, CT DEP
Enid Mitnik, ME DEP
Stephanie D'Agostino, NH DES
Beverly Migliore, RI DEM
Maria Victoria Peeler, WA DEC

Lori Segall, MA DEP
John Gilkeson, MN PCA
Peter Pettit, NYS DEC
Karen Knaebel, VT DEC
Jay Cross, CA DTSC

Attachment E: Sample Comment Letters

Sample Letter #1

{Date}

IMERC
c/o NEWMOA
129 Portland Street, 6th floor
Boston, MA 02114

{Contact Name}
{Company}
{Address}
{Email}

Subject: Mercury-Added Product Notification Form

Dear Mr./Ms. {Contact Name},

Thank you for submitting the Mercury-Added Product Notification Form, dated **{Date}** for {Company}. Environmental agency representatives from the states of Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont have reviewed the materials you submitted under their Mercury-added Product Notification requirements. This review was facilitated by the Interstate Mercury Education and Reduction Clearinghouse (IMERC), and this response outlines our joint decision.

The Notification Form that you submitted reported total mercury use for calendar year 2005 (Column 7, Section IV). Manufacturers or their distributors were required to submit complete First and Triennial Notification Forms, including all product information and data on total mercury use for US sales of their mercury-added products beginning in calendar year 2001 and with the first triennial reporting in 2004. If Stearns had sales in those reporting years, please provide the total mercury data for calendar years 2001 and 2004. The next Triennial Notification Form will be due in April 2008 to cover mercury-added product sales in calendar year 2007.

Please send IMERC a response to these requests by {1 month from letter date} so that we may complete your file. If you have any questions, please contact Adam Wienert, IMERC, at (617) 367-8558 x307 or awienert@newmoa.org. Once we have received the necessary information, we will send you a letter stating your file is complete. We look forward to working with you to resolve the issue{s} outlined above.

Sincerely,

{Name and State of IMERC Chairperson}

IMERC Chairperson

cc: Tom Metzner, CT DEP
Lori Segall, MA DEP
Peter Pettit, NYS DEC
Karen Knaebel, VT DEC

Enid Mitnik, ME DEP
Stephanie D'Agostino, NH DES
Beverly Migliore, RI DEM

Attachment E: Sample Comment Letters

Sample Letter #2

{Date}

IMERC
c/o NEWMOA
129 Portland Street, 6th floor
Boston, MA 02114

{Contact Name}
{Company}
{Address}
{Email}

Subject: Mercury-Added Product Notification Form

Dear Mr./Ms. {Contact Name},

Thank you for submitting the Mercury-Added Product Notification Form, dated **{Date}** for {Company}. Environmental agency representatives from the states of Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont have reviewed the materials you submitted under their Mercury-added Product Notification requirements. This review was facilitated by the Interstate Mercury Education and Reduction Clearinghouse (IMERC), and this response outlines our joint decision.

Please submit an updated Notification Form to report the mercury content in each product (Column 4, Section IV) in parts per million (ppm). Acceptable ranges are >0-10 ppm, >10-50 ppm, >50-250 ppm, and >250 ppm.

You can find the correct Notification Form and instructions on how to complete it at the following WebPages:

Form: <http://www.newmoa.org/prevention/mercury/imerc/FormSingle.pdf>

Instructions: <http://www.newmoa.org/prevention/mercury/imerc/InstructionsSingle.pdf>

Please send IMERC a response to these requests by {1 month from letter date} so that we may complete your file. If you have any questions, please contact Adam Wienert, IMERC, at (617) 367-8558 x307 or awienert@newmoa.org. Once we have received the necessary information, we will send you a letter stating your file is complete. We look forward to working with you to resolve the issue{s} outlined above.

Sincerely,

{Name and State of IMERC Chairperson}
IMERC Chairperson

cc: Tom Metzner, CT DEP
Lori Segall, MA DEP
Peter Pettit, NYS DEC
Karen Knaebel, VT DEC

Enid Mitnik, ME DEP
Stephanie D'Agostino, NH DES
Beverly Migliore, RI DEM

Attachment E: Sample Comment Letters

Sample Letter #3 – Examples for Lamp Manufacturers

{Date}

IMERC
c/o NEWMOA
129 Portland Street, 6th floor
Boston, MA 02114

{Contact Name}
{Company}
{Address}
{Email}

Subject: Mercury-Added Product Notification Form

Dear Mr./Ms. {Contact Name},

Thank you for submitting the Mercury-Added Product Notification Form, dated **{Date}** for {Company}. Environmental agency representatives from the states of Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont have reviewed the materials you submitted under their Mercury-added Product Notification requirements. This review was facilitated by the Interstate Mercury Education and Reduction Clearinghouse (IMERC), and this response outlines our joint decision.

Lamp manufacturers are required to submit lamp product data using the Lamp Manufacturers' and Distributors' Mercury-added Product Notification Form. To find the correct version of the Form and instructions on how to complete it use the following WebPages:

Form: <http://www.newmoa.org/prevention/mercury/imerc/LampFormSingle.pdf>

Instructions: <http://www.newmoa.org/prevention/mercury/imerc/LampInstructions.pdf>

Please resubmit the Notification Form and report the mercury content of your {Product Name} (Column 2, Section IV) using the ranges provided on the IMERC Form. Acceptable ranges are 0 – <5mg, >5 – 10mg, >10 – 50mg, >50 – 100mg, >100 – 1000mg, and >1000mg.

Please note that you are required to report on all mercury-added products, in addition to the mercury-containing lamps. You must submit a separate form for the other mercury-added products containing these lamps. You can find that form and instructions on how to complete it at the following links:

Form: <http://www.newmoa.org/prevention/mercury/imerc/FormSingle.pdf>

Instructions: <http://www.newmoa.org/prevention/mercury/imerc/InstructionsSingle.pdf>

Please send IMERC a response to these requests by {1 month from letter date} so that we may complete your file. If you have any questions, please contact Adam Wienert, IMERC, at (617) 367-8558 x307 or awienert@newmoa.org. Once we have received the necessary information, we will send you a letter stating your file is complete. We look forward to working with you to resolve the issue{s} outlined above.

Sincerely,

{Name and State of IMERC Chairperson}
IMERC Chairperson

cc: Tom Metzner, CT DEP
Lori Segall, MA DEP
Peter Pettit, NYS DEC
Karen Knaebel, VT DEC

Enid Mitnik, ME DEP
Stephanie D'Agostino, NH DES
Beverly Migliore, RI DEM

Attachment E: Sample Comment Letters

Sample Letter #4 – Examples for Auto Manufactures

{Date}

IMERC
c/o NEWMOA
129 Portland Street, 6th floor
Boston, MA 02114

{Contact Name}
{Company}
{Address}
{Email}

Subject: Mercury-Added Product Notification Form

Dear Mr./Ms. {Contact Name},

Thank you for submitting the Mercury-Added Product Notification Form, dated **{Date}** for {Company}. Environmental agency representatives from the states of Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont have reviewed the materials you submitted under their Mercury-added Product Notification requirements. This review was facilitated by the Interstate Mercury Education and Reduction Clearinghouse (IMERC), and this response outlines our joint decision.

For the {Name of Product}, columns 9 and 13 on the Table in Section III are inconsistent --- column 9 listed “yes” for the entertainment display, but column 13 did not list a range. Please verify that columns 9 and 13 are consistent for all models.

Please confirm that the models missing from these Notification forms are in fact discontinued (e.g. {Name of Models}) and please identify any other discontinued models that have previously been reported via email to Terri Goldberg at tgoldberg@newmoa.org.

A navigational system was previously reported for models {Name of Models}, yet there is no navigational system listed in this most recent notification. Please confirm that this is correct.

Please send IMERC a response to these requests by {1 month from letter date} so that we may complete your file. If you have any questions, please contact Adam Wienert, IMERC, at (617) 367-8558 x307 or awienert@newmoa.org. Once we have received the necessary information, we will send you a letter stating your file is complete. We look forward to working with you to resolve the issue{s} outlined above.

Sincerely,

{Name and State of IMERC Chairperson}
IMERC Chairperson

cc: Tom Metzner, CT DEP
Lori Segall, MA DEP
Peter Pettit, NYS DEC
Karen Knaebel, VT DEC

Enid Mitnik, ME DEP
Stephanie D'Agostino, NH DES
Beverly Migliore, RI DEM

Attachment F: Sample Second Comment Letter

*Send Certified Mail and Attach First Comment Letter

{Date}

{Contact Name}
(Reporting Company/Organization)
{Address}

Subject: Mercury-Added Product Notification Form

Dear Mr./Ms. {Contact Name}:

On {Date}, IMERC sent you the attached email requesting modifications to the Mercury-added Product Notification Form submitted by {Company}. To date we have not received a response. Until we receive a satisfactory response to the previous email letter, you have not fulfilled the states' Mercury-added Product Notification requirements.

The {Date} email asked you to clarify the following issues from the Mercury-Added Product Notification Forms dated {Date} from {Company}:

{Restate the questions from the first comment letter}

Please send us a response to this request by {1 month from letter date} so that we can complete your file. If the requested information is not submitted by this date, IMERC will refer this matter to the participating states for continued follow-up and possible enforcement.

If you have any questions about this, please contact Adam Wienert, IMERC at (617) 367-8558 x307, or awienert@newmoa.org. Once your file is completed, we will send you a letter stating that it is complete.

Sincerely,

{Insert Electronic Signature}

{Name and State of IMERC Chairperson}
IMERC Chairperson

cc: Tom Metzner, CT DEP
Lori Segall, MA DEP
Peter Pettit, NYS DEC
Karen Knaebel, VT DEC

Enid Mitnik, ME DEP
Stephanie D'Agostino, NH DES
Beverly Migliore, RI DEM

Attachment G: Checklist for IMERC Review of Notification Form

___ Section I – Type of Notification:

- Make sure the company has indicated the proper type of Notification
 - First Notification = 2001
 - Triennial Notification = 2004, 2007, etc.
 - Updated Notification = interim filing years (does not require totals data)

___ Section II – Reporting Company Information:

- Note if the company is a Manufacturer, Distributor/Wholesaler, or Importer.
- Review the reporting company information to determine if it is complete and consistent with past filings.
 - Address
 - Contact person

___ Section III – Manufacturer Information:

- Review the manufacturer information to determine if it is complete and consistent with past filings (sometimes this is the same as the reporting company).
 - Address
 - NAICS code
 - Contact person

___ Section IV – Product Information Table:

- Column 1:
 - Compare product categories used in this filing with previously approved filings. Note any products that may be added or missing.
 - Did they report all the products they manufacture that have intentionally added mercury? It is helpful to check the company's website.
- Column 2:
 - Is the product description or location adequate to define the product?
 - Is the product information available on the company's website?
- Columns 4 and 5:
 - Is the amount of mercury reported correctly?
 - Did they report an exact amount or a range?
 - Does the amount look consistent with other filings for similar products?
- Column 7:
 - If the total is being reported, what year are they reporting for and do we have totals for past reporting cycles if they sold products in those cycles?
 - Do the totals look consistent with previous filings? If they are exactly the same, it may be suspect.
- If they are reporting that they phased-out a particular product, did they provide a date for when they ceased production of this mercury-added product?

___ Section V – Certification:

- Make sure there is an original signature on the form.

Appendix C

P2Rx Topic Hub Development Guide

Proposed as standard, January 15, 2003

Revised and proposed, March 26, 2003

Adopted April 25, 2003

The intent of the topic and sector hubs is to provide relevant resources containing the best of the best documents, thus avoiding duplication where possible and providing sector-specific information focused on pollution prevention.

Define the topic or sector.

As a rule of thumb, the more narrowly defined, discreet topics will be easier to manage than will be broad topics. In the case of broad topics, it is left up to the developer as to how to address breaking down the information. For example, in the case of mercury, multiple Centers developed and maintained different sub-hubs.

What or whom is the audience this topic hub is written for?

This decision is paramount to the development of the topic hub and should be established before any additional work is done.

The topic hub project primarily serves assistance providers as they assist their customers (businesses, manufacturers, public agencies, citizens, etc.) These assistance providers include, but are not limited to, P2 Specialists, Technical Assistance Programs, Small Business Development Centers (SBDCs), Small Business Assistance Programs (SBAPs), National Institute for Science and Technology (NIST) Manufacturing Extension Partnerships (MEPs), Cooperative Extension Programs, trade organizations, professional organizations, tribes, educational organizations, local governments, private consultants, and vendors. Consequently, hub navigation, link descriptions, search functions and resource reviews are directed to the service provider community. The text, vocabulary, and flow of the hub should reflect that the information is presented with the target audience in mind.

Identify peer reviewers and topic hub collaborators.

A topic hub collaborator should be identified before the topic hub is proposed to the P2Rx group in general. A collaborator is a person or organization that develops all or part of the hub in conjunction with the Center leading the development of the hub. In some cases a collaborator will be identified later in the process of development as the Center realizes the need for assistance and expertise and a relationship can be forged.

A list of individuals fluent in the topic or subject should also be identified in the beginning. These people can be contacted early in the process to secure commitments for reviewing the topic hub once the hub is complete. The individuals may be industry representatives, a technical assistance provider who has worked with the topic or sector, trade association representatives, etc. These relationships also help to begin marketing the hub.

Core Subsections

Every core subsection should be included in an “industrial sector” topic hub. Topic hubs that have “environmental topics” as their subject (e.g. Mercury) should include all core subsections except “operations.” Additionally, inclusion of other subsections is necessary for topic hubs. Decisions regarding the naming and inclusion of additional subsections are left up to the discretion of the developer. An example of a topic hub where traditional subsection titles do not fit is the Residential Construction Industry topic hub.

Ideally, each subsection should only be one to two pages in length. In a few cases, extra space may be required to adequately describe the topic. Information on these pages should be directed to the technical assistance provider or end user, and should provide the bottom line, usable information.

Use the following guidelines when developing the content for the introductory page and also when selecting content for the subsections. Some links may be appropriate for more than one subsection.

Each subsection has a narrative and may have a list of core links. The following is information and description for each subsection.

The use of acronyms, abbreviations and technical terms should be avoided if possible. If they are used, developers should make a special effort to provide an explanation or reference. See below for references to an optional dictionary section and an acronym and abbreviation section.

Required subsections for the topic hubs

1. Welcome and Table of Contents

This subsection provides an overview of the other subsections. It should also contain a brief "how to use" statement describing the topic hub. The core links for the subsection are the three to five best links that thoroughly describe the topic or provide the most valuable references.

2. Topic Hub Overview and Background

The background explains the problem and/or industrial sector addressed by the hub. The overview is what the hub is about. This overall subsection provides demographic industry information useful to policymakers, grant writers, trade groups, researchers, journalist and others. This demographic information should help describe where the topic can be found, its scope and breadth, and why it matters. This narrative should have enough information so that the user knows they are at the right place for the information they need. Type of information to include in this section includes:

- Definition of the topic
- Demographic information such as revenues associated with the topic and geographical area of significance
- SIC and NAICS codes when available

Fast facts that can be bullets used to illustrate size, distribution, and economic importance of topic-related interests.

- Synonyms, keywords and associated terms
- Common products
- Common processes

- Key environmental and/or health impacts of the topic or sector
- Development questions for this section include:
- Does this section provide a description of the problem that would be of use to the intended audience?
 - Have you considered other audiences and written the overview section to accommodate their needs?

3. Operations (for “industrial sector” topic hubs only)

The intent of this subsection is to move the reader from awareness to knowledge. The operations section should describe how a particular sector works, how to recognize the sector. This description is written for a novice learning what makes the sector work. This subsection provides a generic description for a typical operation:

- Material inputs
- Processes used
- Waste Streams (outputs)
- Process Flow Charts and Diagrams

Outputs should tie in with environmental concerns identified in the “Background and Overview” section. These are essential for describing operations of the sector; providing a list of processes; and likely inputs and outputs. These links should correlate introductory information in a document or website to operations information (inputs, processes, and waste streams) for each process used in an industry. This may also be displayed as the “Top 10 Documents” or “Top 10 Documents and Links”. “Links” means a link to another key website.

Also see “Complete List of Links” section for discussion of specific information to be included with documents and links.

4. Reasons for Change

This section should help the reader better understand the need to change. Consider key incentives for change. The biggest reason for change for many will be to come into compliance with regulations. There are also non-regulatory drivers for change like cost savings and good public image. The content portion of the narrative should include information like:

- Listing of the most important compliance issues
- Top things that an inspector looks for
- Most common violations
- Cost saving measures
- Non-regulatory drivers
- A link to the National Metal Finishers Resource Center (NMFRC) State Regulations Locator or other resources for state regulations.
- EPA enforcement action and briefs as written to a particular industry or sector. These can be used to illustrate what not to do.
- Liability
- Health and safety impacts.

5. P2 Opportunities or P2 Options

This subsection contains the information about alternatives to reduce waste in the input and process portions of the operations. The P2 Opportunities subsection should help a reader identify change options, alternatives, and best management practices. This subsection includes:

- Case studies
- Success stories
- Waste reduction guides
- Best Management Practices
- Ideally, an overall checklist for the sector
- Process options that reduce waste streams or improve process performance

The text should include a list of ways to change, and a list of the most important ways to improve environmental compliance and waste reduction activities. Provide practical, actual projects and technologies in this section. Avoid references to “old” technologies and practices. For example, in printing pre-press, a formerly common P2 recommendation was that of adding squeegees onto plate processors to minimize chemical and water use. Normally, except for the occasional small printer still using older equipment, this recommendation no longer applies because of overall upgraded equipment available to the industry. Resources referenced within the hub should typically be directed toward the end user, or customer, and contain information such as “Top 10” or “Things to Do” lists.

Write these P2 recommendations in terms the intended audience understands.

6. Where to go for Help

This subsection may contain links to other websites as well as individuals who are experts and/or programs directory contacts. Examples of links include:

- Link to the Thomas Register
- Link to appropriate OECA Center
- National trade associations
- Links to assistance programs like MEPs, SBAPs, and P2Rx partners
- Access to Info USA yellow pages
- Link to regional consultants directory.
- Names and contact information of specific individuals who are technical, compliance and/or p2 experts in the sector or topic.

In some cases a link to the programs database may not meet the needs or expectations of the topic hub developer. For example, the developer of a topic hub wants the names of specific organizations and individuals having specialized experience in the sector to appear as the first contacts the user sees. The current programs database structure displays in alphabetical order all individuals and organizations with expertise in this sector or topic. Consequently, the list is not prioritized. In this case, the author may opt to add another field to the contacts section to include the prioritized contacts and programs.

7. Complete List of Links/Resources

There is no required specific number of links to documents and resources. However, in a case where very few documents are linked, either due to the limited availability or quality and age of documents currently available, it may be worthwhile to include a comment in the topic hub development form.

In order to determine the validity and quality of a document that will potentially be linked on the topic hub, some questions to consider:

- Does the information seem well researched?

- Does the information seem current and commonly used or cutting edge?
- Are there any references or bibliographies associated with the document?
- Is there a statement about the source of the document?
- Is there a date the document was first published and revised?
- Is there a reference to an organization associated with the document (EPA, etc.)
- If available, is this document endorsed and/or reviewed by an industry association or a known technical expert?
- Is the resource available in full text rather than bibliographic or descriptive information only?
- Are there gaps or is there any obvious missing information?
- Are there dead links or empty files within the electronic document?
- Does the information go into sufficient depth?
- Does the resource cover the subject matter adequately?

Each link should contain the following items:

Hub Topic – This is the subject of the specific hub or the hub for which the URL is pertinent. This can be a multi-valued field if the document is used in more than one topic.

Title – Include the full title of the document, including any subtitle. When a title is not obvious, extrapolate the best title you can by basing it on the content. Titles should be input in title case. As an example: “Worksheet to Help You Choose a Better Blanket Wash.” If the document is in a non-HTML format, place the format type in parentheses at the end of the title. As an example: “Worksheet to Help You Choose a Better Blanket Wash” (PDF).

URL - If only one URL describes a resource, then the web address should take the user directly to the first page of the document. This is usually a title page or table of contents page. Do not simply put the address for the website home page from which this document resides; drill down to the actual document to select the URLs. Some websites do not allow external linking to internal pages within their site so be sure to test all internal links.

The objective of the topic hub is to provide quality, useful information that will help reduce the user’s research time. Wherever possible, duplicate information should be avoided. Current, quality information that has been peer reviewed should be prioritized for all links to documents in the hub.

Consider having a link to a form or an e-mail address for users to recommend a document or link. Likewise, consider providing a request for assistance and a link to a form or an e-mail address so users can notify the webmaster when a broken link is found.

Is the document a core link? For items found in a framed @ web page, make sure the URL is the address of the document and not the frame in which it resides. To determine the actual URL of a document found within a frame, view the Info@ on the publication, or right click and go to the frame in a new window.

For documents available in several formats, include all in a separate record for each format type. In the case of sections of a notebook, the section summary page is preferred over the direct link to the PDF file or WordPerfect File for each section on to the topic hub.

Avoid URLs from clearinghouses and collections in favor of URLs from the original source.

Description of document – Briefly describe the document. It is suggested that ten or fewer words be used, but additional description may be necessary in some cases.

Source – This is the name of the organization responsible for the development and content of the document. It is not the name of the organization that indexed it, unless the developer and the indexer are the same. Occasionally, the source information is unavailable. In which case, the source field can be left blank or a best educated guess can be listed.

Use the full name of the organization, not just abbreviations. Follow the full name of the organization with the initials for the organization. Example: Iowa Waste Reduction Center (IWRC) or Printers' National Environmental Assistance Center (PNEAC). When possible, use the original source URL for a document, not a URL from a collection such as Envirosense. An example of the first instance is that of a document found from a link at the Pollution Prevention Regional Information Center (P2RIC) website that was published by the Kansas State University Pollution Prevention Institute; the designated source would be the Kansas State University Pollution Prevention Institute. An example of the second instance would be that of a document, found at Envirosense, created by the Waste Management & Research Center (WMRC); the designated source would be WMRC.

Resource type – Choose from video, fact sheet, case study, etc. Do not capitalize the resource type for data entry purposes

Date – This is the date the document was originally developed or, if available, last modified. In the case of documents having no date (common on web based documents), include, “not available”. Do not include the date that the source website last modified their site. Add date in the format of either mm/dd/yy or four-digit year, i.e. 1999.

Date Record Added – This is the date that the topic hub developer added the document with the specific mm/dd/yy or four-digit year format, i.e. 1999. This date is essential for database maintenance.

Geographic Scope – This refers to geographic encompassment such as nationwide, statewide, region, etc. Specify applicable state, region, county, city, etc.

Link Q/A Questions

1. Do the provided links complement, instead of duplicate, documents developed by various agencies and organizations with those documents containing the same information?
2. Are the links comprehensive? Are there enough links to cover the entire industry, process, or subject?
3. If there are not comprehensive collections of links, explain why in the development summary document. For instance, documents do not exist; or, there may be limited availability of specific documents versus broad and general documents.
4. Are most of the documents from one state or region? The topic hub developer should at least attempt to identify documents from all over the U.S. instead of only documents available from the developer's region. If the latter is the case, the author should provide an explanation about the availability of quality documents.

5. During the search for documents and links, did you perform any searches on specific websites?
6. During the search for documents and links, did you send any inquiries to various listserves? There are several industry-specific environmental listserves such as Printers' National Environmental Assistance Center, and CCAR Greenlink, among others. Examples of good sources of documents and site links are trade organizations, magazines, Environmental Protection Agency (EPA), state regulatory agencies, local government agencies, regional government organizations, and consortiums, universities, etc.
7. For a PDF document, use the actual PDF URL so the user will be able to click on the link to go directly to the document.

Copyright

Many valuable resources, including magazine articles, etc., are copyrighted. Full text document links are preferred over document summaries. If the full text of a copyrighted document is linked, the topic hub developer should first obtain permission from the source to link the full text document.

Hard Copy Documents and Resources

Although documents available in electronic format are preferred, there are some hardcopy documents, especially lengthy manuals, etc., which may be appropriately referenced on the topic hub. Information on how to order the publication should be provided in addition to the document reference information.

If a hardcopy resource is being considered for inclusion in a hub, the following criteria may be used to evaluate whether or not to proceed with the reference:

1. Does the resource meet the same criteria for quality, reliability, usability, and pertinence to the topic as those established for on-line resources?
2. Can the resource become web-based? Is its length convenient for scanning? Is its copyright restricted? Would the author agree to conversion to a web format? Could it reside at the author's site or on a P2Rx Center's site? Documents eligible for web publishing should be published and included in the hub as online documents. The hub developer may opt to link to a lengthy electronic version in addition to explaining how someone can obtain hardcopies.
3. Does the resource duplicate or complement existing web-based documents and resources already referenced in the topic hub? If available online resources provide the same information contained in a hardcopy or electronic resource, there is no need to include the hardcopy reference in the collection.
4. Can the hardcopy resource be easily obtained through the national library loan system; a government document clearinghouse; or by a direct request to the producer? If a valuable hardcopy resource is not in the interlibrary loan system and is not readily available from the publisher, the topic hub author should take responsibility for adding the resource to the interlibrary loan system before including it in the hub.

Topic Hub Resource Type

These are examples of types of topic hub resources. Revised 6/26/00. This is a filtered list of resources keyed by logical resource grouping.

- Article/report
- Audio/video

- Case study/success story
- Fact sheet/checklist
- Manual/handbook/curriculum
- List – A directory, index/hub, links page, contacts, catalogue, bibliography, or simple database
- Periodical
- Calendar
- Software/electronic tool – This is to include highly interactive databases and online tools, an example of which is Life Cycle Analysis for Building Materials
- Website – In the event that you reference an entire site or homepage for, perhaps, an organization, contact, or vendor. Should not be overused for difficult-to-identify resources.
- Chapter
- Proceedings
- Other Resources

Subsection Bibliography

This is the complete list of links that collected for this subsection. It contains all links to background information on operations, processes and waste streams. The List of links for additional information on the topic goes here.

Links to other Web Sites

When evaluating websites for a potential link on the topic hub, the goal is to provide only sites with high-quality content. To evaluate the quality of content consider:

1. What is the scope of the website's content?
2. Does the content scope match that of the well-defined hub?
3. Who is the intended audience of the website?
4. What is the primary purpose of the website?
5. What is the purpose of adding this link? What will this link contribute to the topic hub?
6. Is the website current?
7. Is the information accurate (as far as you can determine)?
8. Is the objective of the site clear?
9. Are the links in the website properly working (mainly)?
10. Are there references to individuals in charge of content and/or website maintenance?
11. Does the site depend on graphics? If so, does the provider maintain a separate, text-only version?
12. Will the pages take an inordinately long time to load on machines having slow connections?
13. Is content presented in a well-organized format?
14. Is the site pleasant to look at, stylistically and graphically?

8. Acknowledgments

Logos with Links - The network of centers supporting development (intellectually and financially) of the topic hub should receive appropriate recognition by means of links on the main hub pages. Logos should hyperlink to the home page of the organization. Key logos include: P2Rx, Editor/Publisher Center, Author (if different from the Editor/Publisher).

Editor/Publisher Center - A P2Rx Center oversees the development of specific hubs and will own the data it publishes. Additionally, a hub will be housed on the center's site unless they choose otherwise. The editing/publishing center should be appropriately recognized whenever

one of their particular hubs is republished or when any pieces of their hubs are used. (Note: Topic hub content sharing should automatically credit P2Rx and the Publishing Center when a hub is shared.)

Acknowledgement Page - Every topic hub should have an acknowledgement page. This can be an internal link “Acknowledgements” from the table of contents page. The Acknowledgements page should include the following:

1. Reviewers: Clerical, Web, Technical, and Subject Specialist -- There are a number of types of reviewers contributing to the quality of a hub. A subject specialist or technical reviewer suggests resources for inclusion; provides input into product development; and provides technical content review. An editorial reviewer will review the hub for clerical and grammatical accuracy, literary flow, etc. Web technical specialists will provide feedback regarding the website’s technical and programming functions of the hub. This could include, but is not limited to reviewing links, etc.
2. Content Sharing Organizations-- List of organizations sharing content about a particular topic hub. Such a list may also add credibility to the topic hub.
3. Development Form and QA/QC Review Records-- Each topic hub should be developed, reviewed for clerical/grammatical mistakes, web and internet function, and technical content. Each person reviewing the topic hub builds the credibility of the topic hub. In order to convey that credibility, a list of reviewers and records/dates of reviews should be provided. Details of review should not be necessary. An explanation of how or why this topic or sector was selected to be a topic hub may be worthwhile here. A discussion of factors that lead to the choice of this subject, such as new regulations being developed for a large industry; a nationwide enforcement initiative taking place; general size and scope of an industry affected by multiple sets of environmental regulations, regional priorities, or other factors is appropriate for this section.
4. Dates Links Checked-- This should be done once per month. The Center webmaster should complete this.
5. Dates Content Checked-- This should be done once per year. The topic hub primary authors should complete this. Solicitation for new documents may be necessary, but is not a requirement. Reference the programs database for names of individuals/organizations aware of new materials, emerging trends, etc.

Optional Fields, Categories, and Features of Links/Resources

Core Links and Documents

A core document is a document providing detailed, substantial information about the topic of the subsection. These are the most important essential links on the topic. These links will appear on the introductory page of the corresponding subsection as well as in the subsection bibliography. These essential links of the sector overview provide demographic context. They also provide a global overview of the topic.

The subsection bibliography is a complete list of links for this subsection. It contains all links having background and demographic information for the sector.

Staying Current (optional section)

This hub area provides users with current information on what the hot items are in reference to the given topic. It also bolsters the hubs and gives users a reason to regularly return to the hubs. Collecting news related to a specific topic or sector hub could provide Centers, that are not

already collecting and publishing news on a regular basis, with an opportunity to do so under a narrowly defined scope. This subsection contains information about and links to:

- Listserves
- News
- Newsletters
- Periodicals
- Calendars of events, including training opportunities (if they are specific to the topic; for example, trade association calendars.)

The intent here is to provide the user with a place to go for current information about their topic. The core documents should include the best trade publications.

Add a Link

This feature will not be a separate link, however it is appropriate to include an e-mail link on the topic hub so users can suggest additional resources.

Full Text Search of the Documents

This pertains to full text searches of the references in the information resource database(s). Refinements include search by all of the references associated with a hub, or search by references associated with a subsection. Does this mean a full text search of every document linked?

Contact Us Feature

Is there a link to an e-mail address so users can provide feedback and ask questions about the hub? A name, address, phone number, and a link to an e-mail address contribute to the hub's credibility and reliability.

Topic Hub Navigation and Use Guide

This could include a topic hub site map as well as a discussion of the audience(s) for whom the topic hub was written. A statement that the hub is ultimately available for the entire public may be considered.

Database of Resources

This is a link to the contacts database. At a minimum, the contact information listed in the database should include an organization name, address, telephone number, fax number, e-mail address, URL (if applicable), services, geographic service area (national, state, region, county, city, etc.), topic hub subject and program type.

Print Friendly Page

This optional feature applies to each resource document linked on the topic hub. It allows for a narrative format that will print better than versions printed off a web browser. An alternative is that of providing a PDF-formatted version of the document or a Word Processor Document download option.

Dictionary

Developers should consider adding topic/sector-specific definitions to key terms and words. Special attention should be given to terms used within the hub. Developers may want to consider adding a link to a technical expert's e-mail address, thus inviting users to submit inquiries

requesting the definition of a technical term not listed in the dictionary. This would be especially useful if a dictionary is not provided in the beginning.

Topic/sector-specific definitions can be included. Additionally, definitions related to the topic hub could be included.

Directory of Acronyms and Abbreviation

This section would contain explanations of common acronyms and the abbreviations associated with the hub.

ADA Compliant

Have you considered designing your website to comply with American with Disabilities Act website guidelines? Additional information as to how to make your site ADA compliant can be found at <http://castor.tsl.state.tx.us/ld/pubs/ada/>

Process of Making a Topic Hub

1. Choose topic hub. Base the choice on regional priorities, national need or priorities, and Center expertise.
2. Convene focus group. Include direct and ultimate information recipients.
3. Use guidance document (this document) to write hub.
4. For “industrial sector” hubs, use Sector Hub Checklist to assure requirements are met. For “topic” hubs, use Topic Hub Checklist to assure requirements are met.
5. Submit topic hub to P2Rx editor for Editorial Review and Web Review.
6. Get Final Technical Content Review completed by technical expert.
7. Make suggested changes and publish topic hub. Note: Centers ultimately have discretion on changes and should not accept any changes that change the intent of the information. Changes that improve consistency, clarity, and technical merit, should be incorporated.

Annual review

Review documents and links been each year to evaluate priority and potential replacements. Is there adequate maintenance of the information content? Look at:

1. Creation dates.
2. Last updated dates
3. Archived information

Update hub’s acknowledgement section to reflect review and update.

QA/QC Topic Hub Checklist

(Requirements for “topic” hubs)

Proposed as standard, January 15, 2003

Proposed as standard March 26, 2003

Adopted April 25, 2003

Major Categories

1. Welcome and Table of Contents
 - a. Do you identify the intended audience for this hub?
 - b. Is the table of contents complete, that is, consistent with the sections in the hub?
2. Do you have a “Background and Overview” section? (Background explains the problem; overview is what the hub is about.)
 - a. In this section, do you adequately and clearly address the environmental or health impacts of this topic?
 - b. Does the hub provide a clear definition of your topic?
 - c. Does your hub have national or regional significance? (Include information, if possible, as to where this issue is significant)
3. Do you have sections specific to your topic in lieu of an “Operations” section? (Organize your material in a way that is logical to your topic, trying to keep number of sections to a minimum.)
4. Do you have a “Reasons for Change” section? (Note: If the topic hub does not have a “reasons for change” section, the reasons for change should be clearly identified in the sections used in lieu of “Operations” section.)
 - a. In this section, do you list the incentives as to why someone would want to use alternative materials or methods in their operations/processes?
 - b. Did you consider regulations, monetary incentives, training incentives, health and safety concerns, etc.?
5. Do you have a “P2 Opportunities” section? (Note: If the topic hub does not have a “P2 Opportunities” section, the opportunities for pollution prevention should be clearly identified in the sections used in lieu of “Operations” section.)
 - a. In this section, do you provide true P2 alternatives for this topic? (Remember, we’re trying to move people up the waste management hierarchy.)
 - b. Are you sure that the alternatives you provide do not cause other problems that did not previously exist? If other problems may result from the alternatives provided, do you adequately address and describe what they can be? (Do you look at the whole picture, not just material substitution?)
6. Do you have a “Where to go for Help?” section?
 - a. In this section, do you provide contact information on a regional and national basis?
 - b. Does your contact information include name of person, name of organization, address, phone number, fax, and e-mail?
7. Do you have a “links” section?
 - a. Do your links specify format if it is not html (e.g., pdf)?
 - b. Are your links properly catalogued?
 - c. Does each link have a description of fewer than 100 words?
8. Do you have an “acknowledgements” page?
 - a. Are clerical, web, and technical or subject specialist reviewers listed?
 - b. Are the dates the reviews were completed listed?
 - c. Are content sharing organizations listed?

d. Are dates listed for when the links (should be monthly) and the content (should be annually) were checked listed?

QA/QC Sector Hub Checklist

(Requirements for “industrial sector” hubs)

Proposed as standard, January 15, 2003

Proposed as standard March 26, 2003

Adopted April 25, 2003

Major Categories

1. Welcome and Table of Contents
 - a. Do you identify the intended audience for this hub?
 - b. Is the table of contents complete, that is, consistent with the sections in the hub?
2. Do you have a “Background and Overview” section? (background explains the problem, overview is what the hub is about)
 - a. In this section, do you adequately and clearly address the environmental or health impacts of this topic?
 - b. Does it contain the appropriate North American Industrial Classification System (NAICS) or Standard Industrial Classification (SIC) codes (if applicable).
 - c. Have you given demographic information regarding the applicability of your hub? (Example, where are the manufacturers of this product?)
3. Do you have an “Operations” section?
 - a. In this section, do you describe the major inputs and outputs (associated wastes) of the process? (A process map would be useful here.)
 - b. Do your outputs (wastes) tie in with the environmental concerns you describe in the “Background and Overview” section?
4. Do you have a “Reasons for Change” section?
 - a. In this section, do you list the incentives as to why someone would want to use alternative materials or methods in their operations?
 - b. Did you consider regulations, liabilities, monetary incentives, training incentives, health and safety issues, etc.?
5. Do you have a “P2 Opportunities” section?
 - a. In this section, do you provide true P2 alternatives to the common practices and uses of materials discussed in the “operations” section? (Remember, we’re trying to move people up the waste management hierarchy.)
 - b. Are you sure that the alternatives you provide do not cause other problems that did not previously exist? If other problems may result from the alternatives provided, do you adequately address and describe what they can be? (Do you look at the whole picture, not just material substitution?)
 - c. Is the information in this section specific enough such that the user could take or recommend P2 solutions or actions?
6. Do you have a “Where to go for Help?” section?
 - a. In this section, do you provide contact information on a regional and national basis?
 - b. Does your contact information include an individual’s name and/or name of organization, address, phone number, fax, and e-mail?
 - c. Do you have a link to your rapid response service here?
7. Do you have a “Links” section?
 - a. Do your links specify format, that is, pdf or html?
 - b. Are your links properly catalogued?
 - c. Do your links each have a description of less than 100 words?

8. Do you have an “acknowledgements” page?
 - a. Are clerical, web, and technical or subject specialist reviewers listed?
 - b. Are the dates the reviews were completed listed?
 - c. Are content sharing organizations listed?
 - d. Are dates listed for when the links (should be monthly) and the content (should be annually) were checked listed?

Hub QA Review Questions

Editorial Review

Version 1.0

Proposed October 18, 2002

Revised November 8, 2002

Proposed as standard, January 15, 2003

Proposed as standard March 26, 2003

Adopted April 25, 2003

1. Are all narrative pages written in consistent voice and style within the entire hub?
2. Are spelling and grammar correct throughout the entire hub?
3. Are all tables formatted consistently within a subsection? Within the entire hub? (Note: All tables within a subsection need to be numbered sequentially and headings in the same location within the hub. For example, all headings should be at top or bottom, middle or left side, etc. Color or size is not the issue but consistency is desired. We are looking for intrahub consistency. We want to avoid the “cut and paste” look.)
4. Are all figures formatted consistently within a subsection? Within the entire hub? (Note: Same note as for tables.)
5. Are acronyms spelled out the first time they’re used in every subsection?
6. Are all links or items referred to in the narrative in place as advertised? Does the table of contents accurately and thoroughly reflect the content of the hub? (Note: If a hub says, “see case study below,” then there needs to be a case study at the bottom. If a link or diagram is specifically referred to in the narrative or table of contents, it needs to be present and named the same thing.)
7. Are common synonyms, key words and associated terms explained/mentioned? If no, is there a reference to a dictionary?
8. Do subsections contain links to fact sheets, checklists, service providers and other resources to help answer questions? (Note: We will not check as to whether or not these items are here. However, if they are present, we will check that any references to them are consistent with the narrative and that the links work. Additionally, all links – list of links – will be checked by the web reviewer.)

Topic Hub QA Review Questions

Web Review

Version 1.0

Proposed as standard, January 15, 2003

Proposed as standard March 26, 2003

Adopted April 25, 2003

Name of Hub:

Have keywords for this hub been identified? (Hub author should provide a list)

Do they coincide with controlled vocabulary? (P2Rx librarian should reconcile differences)

Has the individual topic hub search been added? If so, is it working properly? (Conduct a practice search using common key words to test the search feature.)

Links:

Are links working properly? Manual review should be done. Hub author should report frequency with which they check links.

If links to documents contain multiple formats, that is, PDF, or document download to file, is there a reference to these formats in addition to the document citation, or does the link go to a page where the user can choose which format to access?

Is the user properly notified when some sort of registration is required to download a document?

Are documents displayed with a tag or some sort of warning when specific software may be needed, for example, Flash.?

For a PDF document, is the actual PDF URL used, so users will click on the link and go directly to the document?

QA/QC Technical Content Checklist

(This checklist is used for the technical expert who reviews the topic hub)

Proposed as standard, January 15, 2003

Proposed as standard, March 26, 2003

Adopted April 25, 2003

Major Categories

1. “Background and Overview” section (background explains the problem; overview is what the hub is about)
 - a. Is the topic or sector defined correctly with respect to the content of the hub? Please provide specific corrections or additional information.
 - b. Is the topic or sector written in terms the intended audience is expected to understand? Note that the intended audience should be defined in this section. As a general rule the topic hubs are written for technical assistance providers, pollution prevention (P2) specialists, small business development centers, small business assistance programs (SBAPs), National Institute for Science and Technology (NIST) manufacturing extension partnerships (MEPs), cooperative extension programs, trade organizations, professional organizations, tribes, educational organizations, local governments, private consultants, and vendors.
 - c. Does this section provide an accurate overview of environmental concerns related to the sector/topic? Please provide specific citations and corrections.
 - d. If provided, are the North American Industrial Classification System (NAICS) or Standard Industrial Classification (SIC) codes correct? Are the lists complete? If not, please provide specific additions or corrections.
 - e. Is the demographic information current and correct? If not, please provide resources to reference and update.
2. “Operations” section (applicable for industrial sector hubs only)

Is the operations description correct? Please provide specific corrections.
Are the material inputs correct? Please provide additions or corrections.
Are the processes presented correct? Please provide specific corrections.
Are the waste streams listed correct and complete? Please provide additions or corrections.
If process flow charts and diagrams are absent, can you supply any of these?
3. “Reasons for Change” section (Note: If other sections are used in lieu of the operations sections, reasons for change and P2 opportunities should be clearly identified within the sections, and should meet the following requirements.)
 - a. Are the compliance issues identified here correct and complete?
 - b. Are you aware of other key items an inspector looks for? If so, please list.
 - c. Are you aware of other common environmental compliance violations? Please list.
 - d. Are the cost saving measures correct and current? Are you aware of additional pollution prevention or waste minimization strategies associated with cost saving measures?
 - e. Are the non-regulatory drivers for P2 accurate and current?
4. “P2 Opportunities” section (Note: If other sections are used in lieu of the operations sections, reasons for change and P2 opportunities should be clearly identified within the sections, and should meet the following requirements.)
 - a. Are the methods current (not outdated)? Are the methods common practice within the sector or topic?

- b. Are specific ways to change presented? Could someone take action as a result of reading these suggestions? Are they correct and complete?
- c. Do you have other suggestions or additions to this section?
- 5. “Where to go for Help?” section
Do you have additional resources or contacts to add to this section? Please supply complete information.
- 6. “Links” section
Are the links relevant and current? You are not expected to read each link, but a scan of the documents and review of a select few may be worthwhile.

Optional Features, Fields, and Categories section

- 7. “Core Links and Documents” section
Are you aware of additional core documents that should be added within any subsection(s)?
- 8. “Staying Current” section
Are you aware of other resources to help users stay current? Please supply details.
- 9. “Dictionary” section
Are there other key vocabulary words or terms that should be added? Please supply word and definition.
- 10. “Acronyms and Abbreviations” section
Are there other key acronyms and abbreviations associated with this sector or topic hub that should be added? Please supply acronym and definition.

Appendix D
P2Rx Programs Data Collection Development Policy
Draft - September, 2002
Updated - 1/03, 6/03

Introduction

This policy is intended to help P2Rx Centers consistently collect information about environmental and business assistance programs so that the data:

- can be integrated into a national programs directory
- can be integrated into other P2Rx products

This policy is not intended to limit regional applications outside of national products nor to standardize appearance of data on regional sites.

The policy includes definitions for:

1. Collection Structure
2. Scope of Collection
3. Collection Maintenance

Why Develop and Publish a Collection Development Policy?

The value of this policy is to:

- Assure consistency in collections that are developed by a distributed team
- Assure that data will combine in predictable ways
- Allow more flexible use of data between applications
- Maintain the quality of the national collection

Audience

There are many potential audiences for programs data since it can be used in a variety of contexts. Program information will commonly be used to refer to expert sources. EPA, topic hub users and other partner organizations (like NPPR) and businesses are potential users in this context. P2Rx Centers themselves are a primary audience in terms of keeping current and knowledgeable about the agencies in our regions. Programs data is also a core marketing tool for P2Rx by virtue of being a record of the audiences we intend to serve.

While users of this type of information are many, the scope of collection (described below) will limit the types of data collected. Therefore, in the case of program information, P2Rx will provide a relatively narrow collection to a broad audience.

Collection Structure

For data to be shared easily and used as a uniform P2Rx product, all databases must contain fields with these content elements. To facilitate sharing and searching of the programs data on the national level, controlled vocabularies for particular fields must be exactly the same (see [Descriptive Information](#) below). * Indicates that this field is required during data entry.

Organization Data Fields

- *OrgID (*auto fill*)
- *Organization
- Division
- *Address1
- Address2
- *City
- *State (*includes territory, province, etc.*)
- *Zip (*includes postal code, etc.*)
- *Country
- *TimeZone (*see vocabulary*)
- *Telephone#
- Hotline#
- FAX#
- Email#
- *URL#
- Graphic URL#
- *Profile
- *GeoServiceArea (*i.e. Service Scope - see vocabulary*)
- *ProgramType (*see vocabulary*)
- Authority and Free Keywords (*See notes on vocabulary.*)
- *Services (*see vocabulary*)
- *Clients Served (*see vocabulary*)

Individual Contact Data Fields

(*More than one contact may be related to each organization; at least one contact must be related to each organization.*)

- *ContactID (autofill)
- *LastName
- *FirstName
- MiddleName
- Prefix Name (*choose from: Mr. Ms. Mrs. Miss Dr.*)
- Suffix
- Title
- Telephone#
- FAX#
- Email
- Primary (Y/N - *is this person the primary contact for the org*)
- *OrgID (relates contact to an organization)

Organization Data Fields

- *OrgID (*auto fill*)
- *Organization
- Division
- *Address1
- Address2
- *City
- *State (*includes territory, province, etc.*)
- *Zip (*includes postal code, etc.*)
- *Country
- *TimeZone (*see vocabulary*)
- *Telephone#
- Hotline#
- FAX#
- Email#
- *URL#
- Graphic URL#
- *Profile
- *GeoServiceArea (*i.e. Service Scope - see vocabulary*)
- *ProgramType (*see vocabulary*)
- Authority and Free Keywords (*See notes on vocabulary.*)
- *Services (*see vocabulary*)
- *Clients Served (*see vocabulary*)

Individual Contact Data Fields

(*More than one contact may be related to each organization; at least one contact must be related to each organization.*)

- *ContactID (autofill)
- *LastName
- *FirstName
- MiddleName
- Prefix Name (*choose from: Mr. Ms. Mrs. Miss Dr.*)
- Suffix
- Title
- Telephone#
- FAX#
- Email
- Primary (Y/N - *is this person the primary contact for the org*)
- *OrgID (relates contact to an organization)

An Access-generated [data definition](#) is included as an appendix for those who need to investigate more technical details of the way the database is structured. A visual interpretation of the data that must be collected and how this can be offered to site visitors as a search is shown in the [sample display document](#).

Scope of Collection

This section defines minimum standards for Centers to follow. If data from regional Centers does not conform to these criteria, it cannot be included in national products. Centers are free to go beyond these minimums to enhance regional use of data so long as it does not interfere with P2Rx participation.

1. Types of Programs

Centers will identify and describe active programs in their region that provide pollution prevention and energy efficiency assistance. Such programs may include PPIS grantees, local P2 programs, university-based P2 programs and non-profit pollution prevention organizations. At least one program in each state must be identified. If pollution prevention or energy efficiency is a focus for SBDCs, MEPS, SBAPs and other organization types, they should be cataloged, as well as NPPR National Roundtable attendees.

Additional programs associated with P2Rx topic hubs will also be included in the regional database. Since many of these programs may be national-scale programs located in other regions or organizations with very specific expertise related to a topic hub, they will only appear in the national directory when specified to do so. In addition, some programs included in a regional database may object to publishing their information in a national database. P2Rx will provide an option for data to be included in a database but not published in certain cases. Centers may also choose whether or not to include them in regional publication of their directory.

2. Descriptive Information -

Beyond basic contact information, organizations in the directory are required to have the following descriptive data:

- time zone where the organization is located (common vocabulary required)
- profile or narrative description including the organization's mission, goals, etc.
- geographic scope of service area (common vocabulary required)
- type of program (common vocabulary required)
- expertise related to P2Rx topic hubs (programs are directly related to hubs if applicable)
- services offered by the organization (common vocabulary required)
- clients served by the organization (common vocabulary required)
- affiliations (common vocabulary required)

<p>TimeZone Vocabulary</p> <ul style="list-style-type: none"> • Eastern • Central • Mountain • Pacific • Atlantic • Other <p>GeoServiceArea Vocabulary</p> <ul style="list-style-type: none"> • National • State • Regional • Local • International 	<p>ProgramType Vocabulary</p> <ul style="list-style-type: none"> • Federal Government • State Government • Local Government • Educational Institution • Non-Profit • Vendor • Consultant • Small Business Assistance Program • NIST - Manufacturing Extension Program • Recycling Program • Material Exchange Program • Small Business Development Center • Energy Efficiency Program
<p>Services Vocabulary <i>(some suggested changes)</i></p> <ul style="list-style-type: none"> • Assessment • Awards • Bank Loans • Compliance (assistance) • Computer modeling • Curricula • Energy Auditing • Facility Design • Inspection (delete?) • Intern Programs • Internet (delete?) • Grants in Aid • Information Services • Library • Materials Exchange • Permits • Site Assessments • Research • Hotlines • Workshops 	<p>Clients Vocabulary <i>(of the organization being described)</i></p> <ul style="list-style-type: none"> • Educational Institutions • Industrial Organizations • Non-profit Organizations • Small Business • Administrative Agencies • Consumers <p>Affiliations</p> <ul style="list-style-type: none"> • NPPR • P2WIN • P2Rx Center • OECA Center

Centers may include additional descriptive terms for sector, process and/or material expertise, using terms in the P2 Thesaurus or proposed for addition to the Thesaurus. Programs will also be allowed to self-describe expertise (sector, process, materials) using their own vocabulary. Terms submitted by programs that are not currently in the Thesaurus will be added to the thesaurus by the P2Rx librarian with appropriate relationships. Some Centers may choose to offer users a drop down list of suggestions for sector, process and material expertise.

A sample data input form that visually shows the descriptive information requested for each program is shown in the [sample display document](#) (on pages 1 and 2).

3. Searching and Filtering - Filtering - Things that make the national Programs Directory and other uses of the data (like in the topic hub) easier to produce. For instance, submitting center ID for each record, avoiding duplication of program ID numbers, filtering out multiple copies of the same organization, or organizations that only make sense in terms of a topic hub, insuring that all "keywords" are numbered consistently among center.

The National Programs Directory will offer the user both simple and advanced search options. The simplest level of searching will include the following options:

- Search by state (drop-down list)
- Search by area of expertise (drop-down list; areas offered will be topic hubs)
- Search by keyword (user types in a word or phrase - searches all fields)

A visual of the search is shown in the [sample display document](#) (on page 4).

4. Data Description - Should each data element have a corresponding meta tag? How should it be incorporated? How can the programs directory be searched by the EPA search engine?

Collection Maintenance

Information about programs is maintained regionally to insure accuracy not possible at the national level.

1. **Regional Maintenance** - When a new program is included in the database, the regional P2Rx Center will input data as they know or can find on the organization's web site. The program will then be asked to verify the information for accuracy and completeness. At least annually, P2Rx Centers will contact each program they have cataloged to check accuracy and update information as needed. Organizations will also be asked to rate their satisfaction with and use of the national and/or regional Programs Directory by means of several short answer questions.
2. **National Maintenance** - If Centers are requesting changes, they will submit updates in a format prescribed by the managing P2Rx Center. A data entry form is being created that will allow the national directory to be updated whenever a correction or addition is made to regional data.

Appendix E
Northeast Waste Management Officials' Association (NEWMOA)

DRAFT

Generic Quality Assurance Project Plan

January 30, 2009

Project Manager Contact Information:

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**Abstract: Generic Quality Assurance Project Plan for NEWMOA Projects That Include
Secondary Data Provided by Participating State Agencies or by Third Parties Voluntarily,
or Pursuant to Participating State Authorities**

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William F. Cass, Executive Director
Quality Assurance Officer

Date

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A3. Distribution List

Each person listed on the approval sheet and each person listed under Project/Task Organization and their subordinates assigned to the project will receive a copy of this Quality Assurance Project Plan (QAPP). For the purposes of this QAPP, the term project means any NEWMOA project that includes secondary data provided by participating state agencies or by third parties voluntarily, or pursuant to participating state authorities. Individuals taking part in such projects and other interested parties may request additional copies of the QAPP from the QA Officer. QAPP distribution will be centralized so the QA Officer can ensure that all personnel are using the most recent revision (see Section A9).

This document has been prepared according to the United States Environmental Protection Agency publication EPA Requirements for Quality Assurance Project Plans dated March 2001 (QA/R-5).

A4. Project/Task Organization

State agency program directors responsible for initiating and approving NEWMOA projects are listed in Table 1, and are shown in the organization chart in Figure 1. The state directors may designate state leads and other staff to work on NEWMOA projects. However, state approval for initiating NEWMOA projects, and for releasing/approving projects upon completion remains the responsibility of the state program directors.

Table 1: Project Implementation Personnel

Individual	Role in Project	Organizational Affiliation
William F. Cass	Project Manager & QA Officer	NEWMOA
Yvonne Bolton	State Project Co-Lead	CT DEP
Robert Kaliszewski	State Project Co-Lead:	CT DEP
Mark Hyland	State Project Lead	ME DEP
Sarah Weinstein	State Project Lead	MA DEP
Michael Wimsatt	State Project Lead	NH DES
Sharon Yergeau	State Project Lead	NH DES
Michael DiGiore	State Project Lead	NJ DEP
David O'Toole	State Project Lead	NYS DEC
Ron Gagnon	State Project Lead	RI DEM
Gary Gulka	State Project Lead	VT DEC

The NEWMOA Project Manager will be responsible for the following activities:

- Overall management and contracting for support services
- Managing communications with participating state agencies and other stakeholders
- Developing consensus concerning
 - The nature/ type of secondary data to be used in the project
 - data quality objectives of the secondary data

- disclosure of limitations and qualifications associated with secondary data
- appropriateness of uses intended for secondary data
- reasonableness of any conclusions based on secondary data
- Ensuring adequate review of project reports by State Project Directors and their designated project participants
- Securing state approval prior to the release of project reports
- Amending the Generic QAPP, as necessary
- Issuing required reports to EPA when project is funded by EPA

The NEWMOA Project Manager may designate NEWMOA program managers and staff to lead or work on NEWMOA projects. However, he/she will remain responsible to the state program directors for the overall project and conformance with the policies and procedures described in the QAPP.

EPA staff will be active participants in projects through review of annual NEWMOA Workplans that describe all planned projects, and through participation in quarterly NEWMOA Board Meetings where project status is reviewed and oversight is exercised by state directors. This support and participation may include:

- Assistance in coordination with the participating states
- Review of drafts

A5. Background and Project Goals and Objectives

As discussed in elements 2-5 of NEWMOA's Quality Management Plan, NEWMOA does not gather primary data such as quantitative scientific data describing contaminant levels in environmental media, and has no plans to begin this kind of research. However, NEWMOA does gather secondary data for various multi-state projects/activities. This data is, for the most part, provided by member state environmental agencies that have obtained it from regulated entities in accordance with state regulatory authorities, is submitted voluntarily to state agencies, or, is obtained through third party submissions to states or NEWMOA as required by participating state statutes or regulations. These secondary data are used, along with other information, for purposes such as: aiding multi-state environmental policy analysis, the review/comparison of conditions/program performance among and between states, informing estimates of changing conditions, or to identify data discrepancies between states that can lead to improved data quality. The limitations of the data are well understood by the participating states and are considered as an integral part of the process that NEWMOA follows when planning and managing projects.

Definition of "project": For the purposes of this Generic QAPP, the term project means any NEWMOA project that includes secondary data provided by participating state agencies or by third parties voluntarily, or pursuant to participating state authorities.

Project goals:

- Improve the ability of NEWMOA member state environmental agencies to develop effective, coordinated, cooperative waste and materials management policies

Examples of Project objectives:

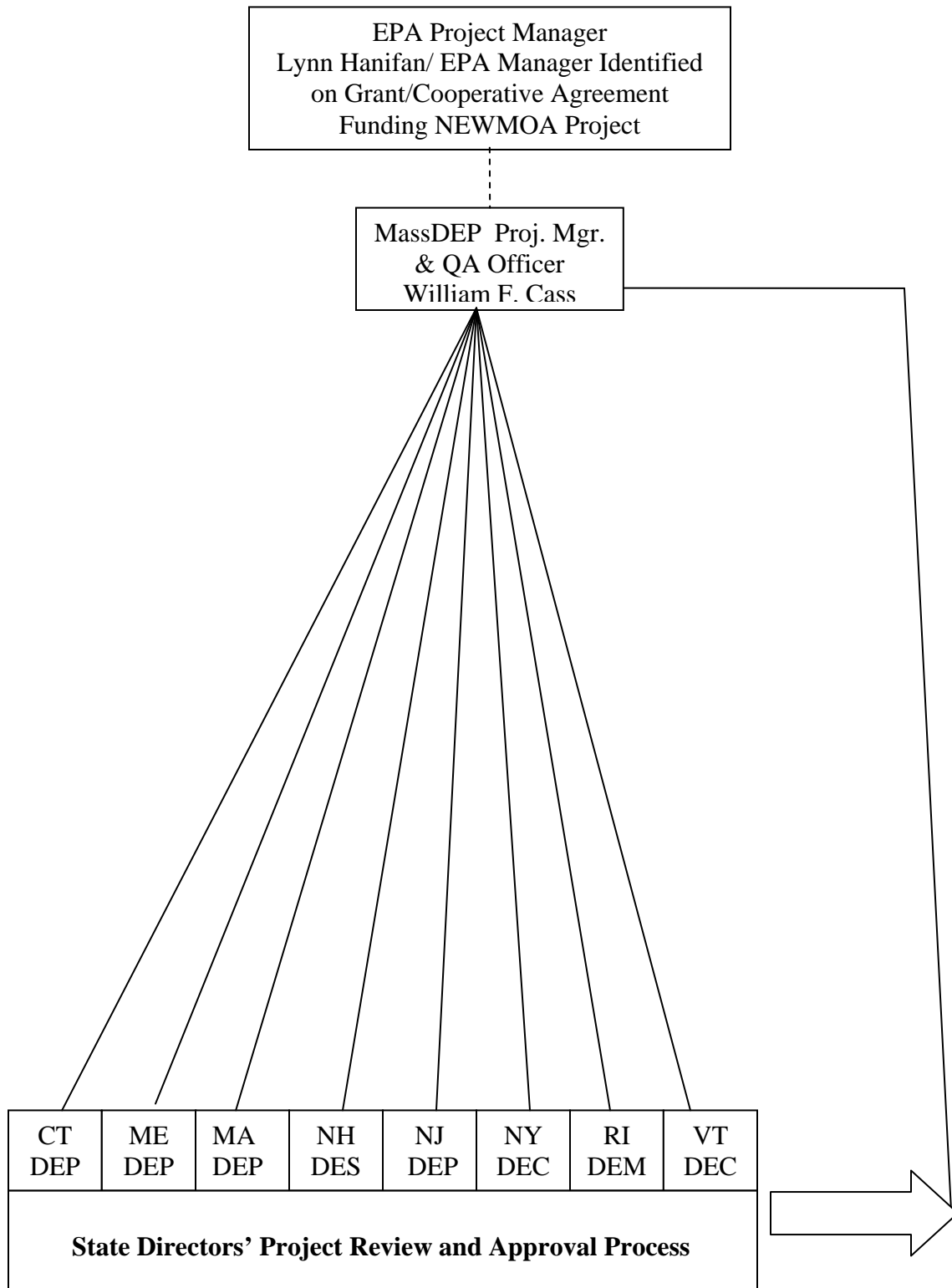
- Assist states in detecting trends concerning waste and materials management

- Assist states in detecting and investigating the reasons for differences among and between states
- Assist states in setting individual and joint state priorities

Examples of Anticipated project results:

- Improved ability of state managers to understand differences between states and within states
- Facilitate general comparisons of the effectiveness and efficiency of different state strategies
- Improved ability to detect and correct data inconsistencies, and improve data gathering procedures

Figure 1: Generic Project Organizational Chart



A6. Project /Task Description-Summary Work Plan and Quality Assurance Provisions

Overview of QA Approach

The Project Manager and each of the participating state project directors will be generally familiar with the quality issues related to the secondary data that will be used in a given project. State project directors usually assign staff that is directly involved with the gathering and management of such data to work on NEWMOA project workgroups. To ensure that there is consensus among the participating state leads concerning the central importance of quality to the success of any project, quality assurance concerns will be examined at the outset of the project during the kickoff workgroup meeting. The state participants will review and concur with the use of, and conclusions drawn from, secondary data in a NEWMOA project at several points in its development.

The quality issues anticipated at each step of the project will be identified and discussed by state and NEWMOA staff to identify appropriate data quality assurance and analysis procedures/criteria at key stages of the project. Participants will agree upon criteria that will govern the extent to which data submitted by states under this project will be accepted for use in a NEWMOA project.

Summary Generic Work Plan

Key elements:

1. NEWMOA Directors and staff identify need for NEWMOA project, secondary data needs and concerns are identified
2. state and NEWMOA staff with the expertise required to perform the project are assigned
3. workgroup participants Identify and agree on details of secondary data that may be needed to perform the project
4. quality issues are identified and a consensus position is reached concerning the suitability of data for the intended purpose and/or the need for and nature of qualifying statements concerning the data
5. state staff review initial project report to ensure that secondary data is correctly used and interpreted
6. near final draft is circulated to non-NEWMOA stakeholders if appropriate
7. final draft is reviewed for approval by NEWMOA state directors
8. project report is released, if appropriate, and is included in reports to EPA where required

For ease of presentation, the elements are presented in sequential fashion. However, all project participants recognize that a number of these activities could operate in parallel.

A7. Quality Objectives and Criteria

The NEWMOA project Workgroup reviews the methodology used for obtaining the secondary data to ensure that the data is suitable for the intended purpose and/or that its limitations are properly described.

A8. Special Training

Decisions concerning the need for special training of state or NEWMOA staff relative to projects covered by this QAPP will be documented in the official minutes of quarterly NEWMOA Directors' meetings that are submitted to EPA Region 1.

A9. Documents and Records

Decisions concerning the initiation and management of projects covered by this QAPP will be documented in the official minutes of quarterly NEWMOA Directors' meetings that are submitted to EPA Region 1 as a condition of the RCRA grant. Accomplishments/milestones concerning the projects covered by this QAPP will be reported in the briefing materials provided to state and EPA participants for each NEWMOA Directors' Meeting, and also in grant reports to EPA Region 1.

Report format/information

The project Workgroup will determine an appropriate reporting format(s) for written information and data as part of the project development elements described in this plan, subject to approval by the state directors.

Document/record control

The recording media for NEWMOA projects will be both paper and electronic. NEWMOA's electronic files are recorded daily and copies are stored off site.

QAPP preparation and distribution

This QAPP conforms to the format described in the United States Environmental Protection Agency publication *EPA Requirements for Quality Assurance Project Plans* dated March 2001 (QA/R-5). The QAPP shall govern the development of NEWMOA projects at all times. Each responsible party listed in Section A4 shall adhere to the procedural requirements of the QAPP and ensure that subordinate personnel do likewise.

This QAPP shall be reviewed at each major milestone of NEWMOA projects utilizing secondary data to ensure that the project will achieve its intended purposes. All the responsible persons listed in Section A4 shall participate in the project review.

The Quality Assurance Officer is responsible for updating the QAPP, documenting the effective date of all changes made in the QAPP, and distributing new revisions to all individuals listed in A3 whenever a substantial change is made. Distribution of the QAAP may be performed by posting the document on an appropriate website available to all individuals listed in A3.

B DATA GENERATION AND ACQUISITION

Sections B1 through B8 pertain to primary data (new data generated for the purpose of a project). Since NEWMOA projects do not involve the generation of primary data, Sections B1 through B8 do not apply. The only data being used by projects under this generic QAPP are secondary data:

B1. Sampling Process Design (Experimental Design)

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

B2. Sampling Methods

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

B3. Sample Handling and Custody

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

B4. Analytical Methods

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

B5. Quality Control

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

B6. Instrument/Equipment Testing, Inspection and Maintenance

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

B7. Instrument/Equipment Calibration and Frequency

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

B8. Inspection/Acceptance for Supplies and Consumables

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

B9. Non-Direct Measurements (I.e., Secondary Data)

The data to be used in NEWMOA projects are exclusively secondary data; these data will be provided by participating states, or obtained from third parties either voluntarily or as directed by state laws/regulations. Data will be accepted upon assurance by states that it has been collected and managed as agreed in the project design.

B10. Data Management

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

C ASSESSMENT/OVERSIGHT

C1. Assessment and Response Actions

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

C2. Reports to Management

This section is not relevant to projects under this generic QAPP. The projects do not involve the generation of primary data.

D DATA REVIEW AND EVALUATION

D1. Data Review, Verification and Validation Criteria

States will assure that data are collected in accordance with the criteria agreed to by the Workgroups and that limitations in the data, if any, are properly described; . The NEWMOA Board of Directors, in approving any NEWMOA project covered by this QAPP, will ensure that the data used adequately support the project results/conclusions.

D2. Verification and Validation Methods

If at any point during a NEWMOA project covered by this QAPP the QA Officer identifies a problem (e.g., the use of substandard data that could compromise the quality of the project), the Project Manager, QA Officer, and any other relevant staff will discuss corrective action. If necessary, the Project Manager will issue a stop-work order until a solution is agreed upon. The Project Manager will implement corrective action in consultation with the state Directors and Workgroup participants. If the solution involves changes in the approach described in this QAPP, the QA Officer will amend the generic QAPP as necessary and distribute the new revision.

D3. Evaluating Data in Terms of User Needs

Final project reports will contain a description of the secondary data used in the project that is prepared by the project Workgroup and approved by the QA Officer. This description will provide sufficient information about the secondary data used to allow an informed decision about its adequacy and appropriateness for use in the project.