

NEWMOA



# Northeast Waste Management Officials' Association

July 2011

## QUALITY MANAGEMENT PLAN

2011- 2016

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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 U.S. 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 U.S. Environmental Protection Agency has developed a mandatory Agency-wide Quality Assurance Program that requires all organizations performing work for U.S. 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 U.S. EPA through contracts, financial assistance agreements, and interagency agreements.

Unlike the other state-sponsored regional environmental interstate associations (i.e., the New England Interstate Water Pollution Control Commission), 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. If NEWMOA engages in such activity in the future, it would utilize the procedures used by the other regional environmental interstates, in consultation with U.S. EPA, to ensure an appropriate level of scientific data quality. NEWMOA's programs and projects focus on narrative material of policy or programmatic significance. When NEWMOA collects and presents quantitative data, they are originally gathered by others, and the Association presents the information along with appropriate qualifications on data quality. 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 utilizing procedures that ensure the highest level of quality assurance that is appropriate to the intended use of the data.

## **Element 1 - Management & Organization**

### **1.1 NEWMOA's Mission**

NEWMOA's mission is to develop and sustain an effective partnership of states that helps achieve a clean, healthy, and sustainable environment by exploring, developing, promoting, and implementing environmentally sound solutions for:

- Reducing materials use and preventing pollution and waste,
- Properly reusing and recycling discarded materials that have value,
- Safely managing solid and hazardous wastes, and
- Remediating contaminated sites.

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

- facilitate communication and cooperation among member states, between the states and the U.S. EPA, and between the states and other stakeholders;
- provide research on and evaluation of emerging issues, best practices, and data to help state programs maximize efficiency and effectiveness; and
- facilitate development of regional approaches to solving critical environmental problems.

### **1.2 Operating Strategies**

In Fiscal Year 2008-2009, the NEWMOA Board of Directors developed the following list of strategies for the Association to help achieve its mission over the next three years. This Strategic Plan is designed to inform the Association's annual planning and budget process. The Board unanimously approved a motion to adopt the Plan at their meeting in March 2009.

NEWMOA develops program and project specific goals, strategies, and activities in its annual workplans. These annual workplans are usually developed through consultation with NEWMOA's Workgroups and Committees, and they are reviewed and approved by the NEWMOA Board of Directors. Each fiscal year NEWMOA holds a Board meeting in September just before the beginning of the next fiscal year, which starts October 1 to make plans for the upcoming year. At that annual meeting, NEWMOA management and staff present proposed annual workplans for each program area, and the Board discusses these proposed plans and votes on them. If they approve the draft workplan, it is considered final. If they do not approve the draft workplan, the NEWMOA staff will make revisions based on their comments, and the Board will vote on a revised workplan during their next meeting. These decisions are recorded in the minutes of the Board meetings.

#### **Strategy #1: Collect, manage, analyze, interpret, present, and share information and data effectively and efficiently and help states develop approaches and tools for program measurement.**

NEWMOA assists the member states in information management and analysis to promote greater efficiency and avoid duplication of effort by individual states; to help states identify opportunities for regional cooperation; to promote consistency, where appropriate, in data definition and collection; and to provide useful information and analysis for individual state decision-making and program planning. NEWMOA prepares data to help demonstrate progress toward strategic goals of the Association and its member states. NEWMOA provides assistance to the states by contributing expertise and by facilitating the use, where appropriate, of consistent measures so that states can examine more effectively how their programs are working.

In the next three years, NEWMOA will provide support, assistance, information, and analysis on the following priority areas:

- performance measurement of state waste management and other programs

- climate change and waste initiatives to support greenhouse gas reduction
- interstate waste flow reports
- beneficial use determinations and solid and hazardous waste recycling
- mercury-added products through the Interstate Mercury Education & Reduction Clearinghouse (IMERC)
- hazard and toxicity of chemicals in commerce; assessments of alternatives; data on chemical use; and identification of new and emerging toxics in the environment
- pollution prevention information resources, including pollution prevention technologies, products, and best practices through the Pollution Prevention Resource Exchange (P2Rx),
- assistance and pollution prevention results through the P2 Results Data System and the Pollution Prevention and Compliance Assistance Metrics Database Software
- improvement and maintenance of the Energy and Materials Flow and Cost Tracker tool
- emerging waste site cleanup technologies and techniques

**Strategy # 2: Coordinate examination of common emerging environmental challenges; recommend unified regional positions and present to Federal and state policy makers; and develop and implement coordinated regional approaches and programs.**

NEWMOA assists member states in identifying and defining emerging issues, particularly those that may be appropriate for regional cooperation and problem solving. In some cases, states may be more efficient and effective at solving their environmental problems by cooperating regionally on program development and implementation than if they were to address those issues individually. Furthermore, the Association provides a forum for sharing different approaches and best practices and solutions for addressing emerging state challenges.

The NEWMOA state programs recognize that their ability to effectively advise U.S. EPA, other federal agencies, and individual states is enhanced when they can find areas of consensus on key regulatory and policy issues and present those views as a unified position. From its inception the Association has helped facilitate the member states' interactions with key federal agencies. Furthermore, the states have used the Association to share their comments and recommendations on national environmental issues to learn from each other and share viewpoints. When there is a uniquely regional perspective or concern regarding an environmental problem, the Association assists the states in articulating that view and sharing it with appropriate national groups and agencies.

In some cases, the NEWMOA member states may determine that their waste management, pollution prevention, site remediation and environmental assistance programs would be substantially enhanced through an initiative undertaken by the Association, such as a multi-stakeholder process to evaluate options for addressing particular problems associated with a waste, technology, or waste management practice. In these cases, the NEWMOA Directors may ask the Association for assistance and seek funding to support the organization in facilitating this kind of activity.

NEWMOA will provide support and assistance on the following near-term priority areas:

- Initiatives that provide key support for state climate change mitigation plans and strategies, including but not limited to waste prevention and recycling initiatives, promoting green remediation, and advancing development of renewable energy systems

on landfills and Brownfields sites.

- Pollution prevention initiatives and their implementation
- mercury reduction legislative initiatives, including management of the Interstate Mercury Education and Reduction Clearinghouse (IMERC)
- state product stewardship initiatives and programs, including implementation of new state electronic waste laws
- other key regulatory and policy positions, in collaboration with ASTSWMO and other national and regional organizations, as appropriate
- best practices in innovative and alternative approaches to compliance, enforcement, and permitting
- assistance with implementation of state Brownfields initiatives
- innovative technologies for prevention, environmental management, cleanup, and improvement
- disaster debris planning and management
- identification of and research on emerging toxic pollutants that are of concern on a multi-state basis and examination of information on safer and “greener” alternatives

**Strategy # 3: Develop and deliver training and provide opportunities for enhanced professional communications.**

Maintaining the expertise and knowledge of professional staff and management is important to the delivery of effective environmental services and programs in the states. NEWMOA has historically provided a variety of training opportunities for member states to help them maintain their standards for Agency performance. Because many of the waste management, waste site cleanup, and pollution prevention programs in the states face similar technical and programmatic issues, developing and delivering training to address these challenges can promote efficiency and avoid duplication of effort. NEWMOA also provides a formal and informal forum for member staff and management to learn from each other and improve their management, technical, and other professional skills.

NEWMOA will provide training on the following near-term priority areas:

- implementation of new and emerging programs and approaches for waste reduction zero waste programs
- hazardous waste regulations and program implementation for inspectors and compliance assistance staff
- multimedia compliance and inspection programs (i.e., best practices, lessons learned)
- pollution prevention, recycling, reuse, and composting
- tools and techniques for developing, implementing, and measuring environmental results programs
- improvements in waste site and Brownfields characterization and conducting waste site cleanups in more environmentally responsible ways
- peer-to-peer collaboration on joint problem solving related to measurement and other high priority topics and challenges
- new methods for delivering training, i.e., web-based and video conferencing

**Strategy # 4: Procure resources to assist states in implementing their programs.**

Procuring the necessary resources to carry out the priorities outlined in this strategy is a critical function for the Association. NEWMOA seeks funding through grants from Federal agencies, contracts with member states, grants from private foundations, and other private sector sources. Funding from federal agencies has included the Environmental Protection Agency Headquarters and Regional Offices, the U.S. Department of Agriculture, and the Department of Energy.

Individual member states sometimes have a need to procure resources to assist them with particular projects that can be most effectively provided by NEWMOA's staff and management. In most cases, the results of the projects that Association undertakes for specific states can be shared with and would benefit the other member states. This can include research, data collection and analysis, specific community-based projects, outreach and education activities, and others.

The following outlines NEWMOA's near-term priorities:

- Diversify the sources of NEWMOA grant funding from federal agencies
- Expand NEWMOA's role as grant funding clearinghouse
- Facilitate shared service contracts among states
- Seek funding from foundations and the private sector, as appropriate and consistent with NEWMOA's policies on private funding to support key strategic initiatives

### **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 Policies are:

- 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.
- d. All projects that support externally-generated environmental data through contracts, grants, or interagency agreements will ensure that acceptable QA requirements are included in the appropriate agreement documents, and that these external parties follow acceptable quality management practices.

### **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 project managers and staff.

NEWMOA's activities and projects are accomplished by NEWMOA staff and Committees and Workgroups made-up of state and, in many cases, U.S. 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 or Workgroups prior to final review and acceptance/approval by the Directors. Observance of the Quality Management Plan (QMP) and the Generic Quality Assurance Project Plan (QAPP) are an integral part of this process.

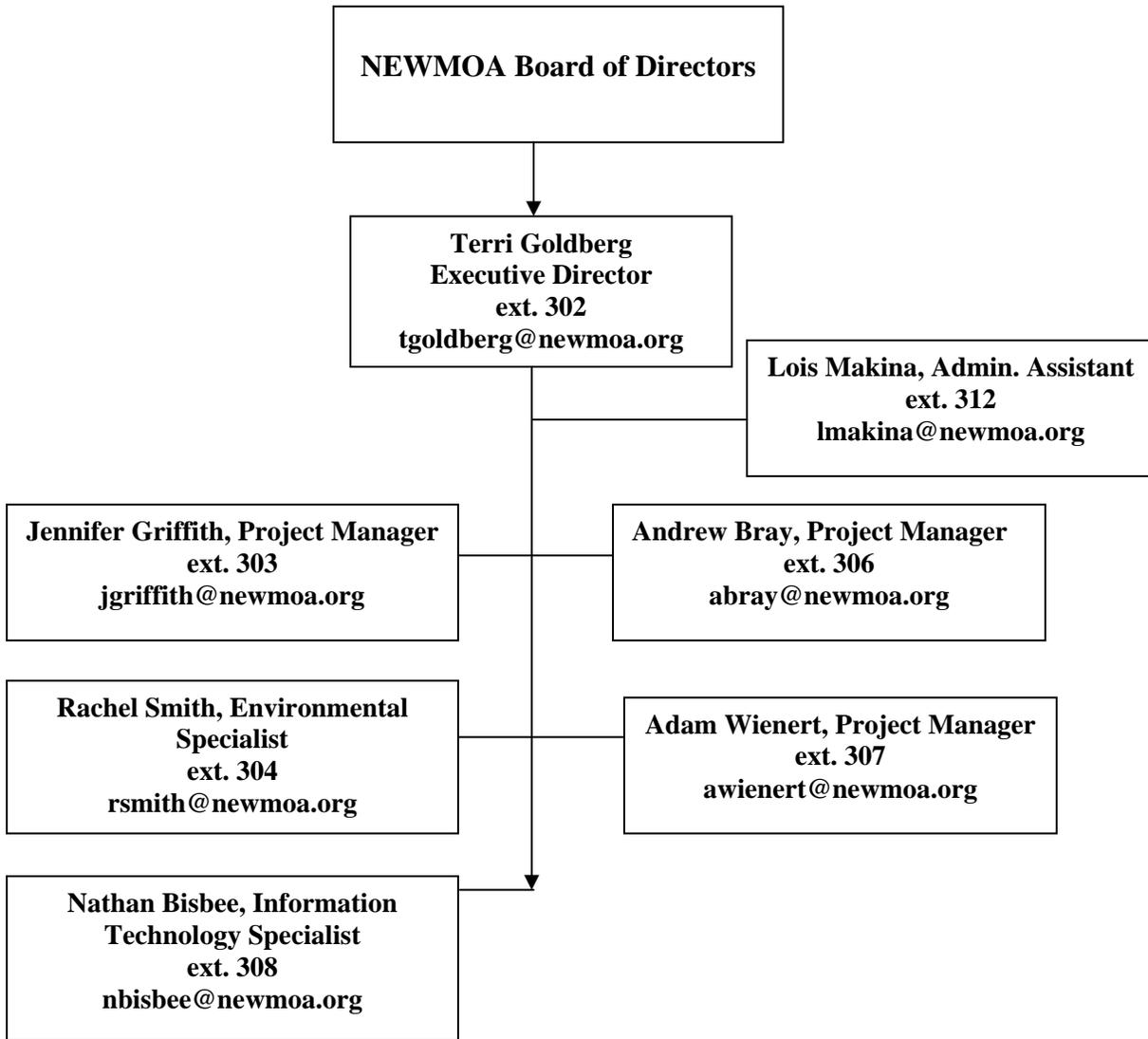
### **1.6 Quality Assurance Manager & Quality Contact**

The Executive Director is the Quality Assurance Manager (QAM) and is responsible to the Board of Directors for ensuring that the Association's QA goals are achieved and that the QMP is followed by NEWMOA project managers, staff, and contractors. The Executive Director is responsible for the Association's overall performance. In addition, he/she directly supervises the Solid Waste, Hazardous Waste, Assistance and Pollution Prevention, Priority Chemicals, and Waste Site Cleanup Programs. The Project Managers report to the Executive Director. 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.

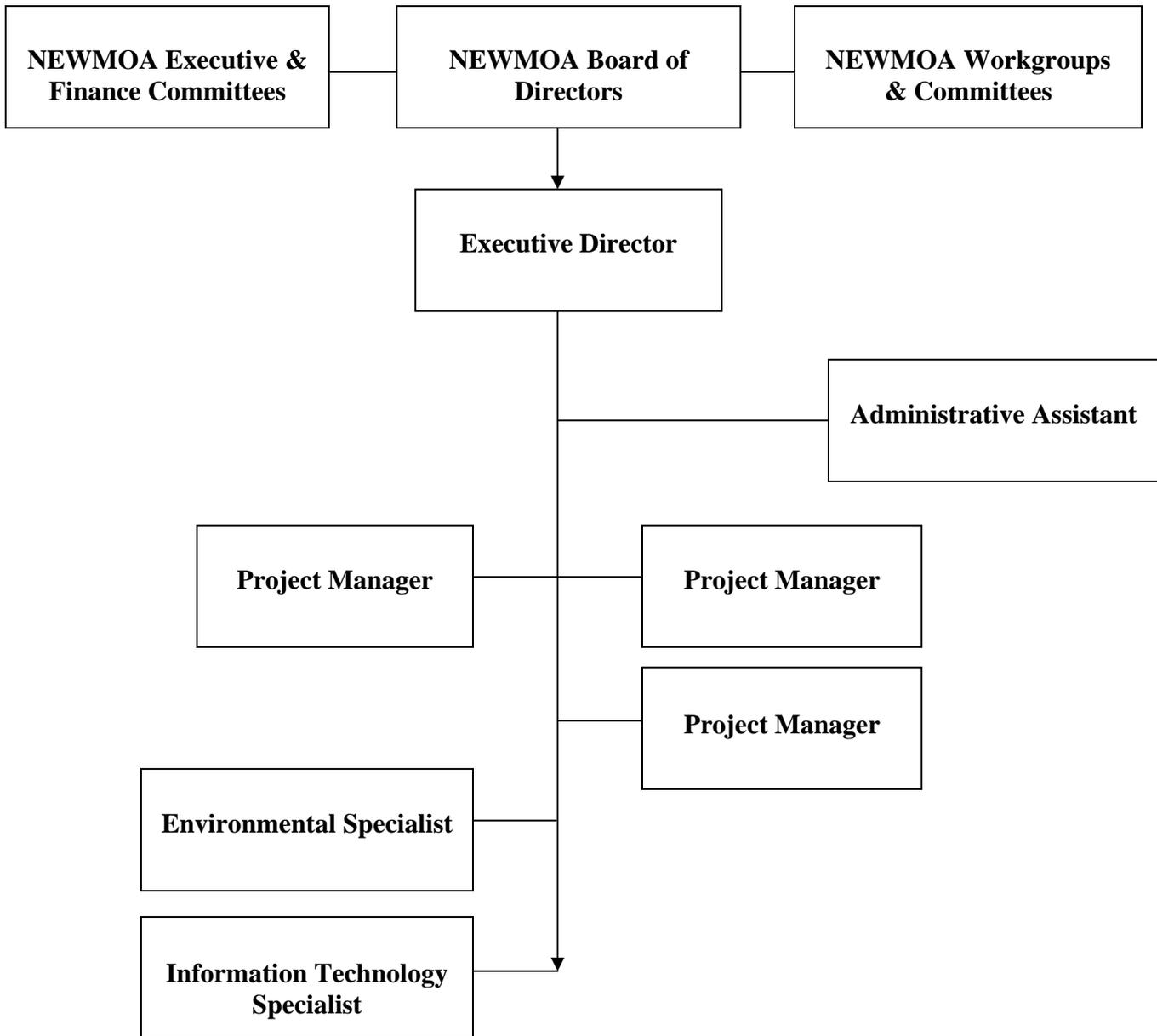
**NEWMOA Organizational Chart  
June 2011**

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## NEWMOA Organization



### Element 2 - Quality System Components

#### 2.1 QMP-QAPPs & SOPs

NEWMOA's Quality System consists of developing and implementing a Quality Management Plan (QMP), a Generic Quality Assurance Project Plan (QAPP), and Standard Operating Procedures (SOPs) for certain ongoing programs. NEWMOA and the U.S. 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 & Management Processes**

Committees or Workgroups participate in the design and management of NEWMOA projects, followed by Board of Directors approval. This oversight provides the framework for NEWMOA's QMP. All of NEWMOA's projects are outlined in the Association's annual workplans for each program area. The NEWMOA staff and management presents drafts of these workplans and the Board votes on them as part of its annual meeting in September. No workplan is considered final until the Board votes to approve it. At each of the other NEWMOA Board meetings, NEWMOA management and staff present reports on the status of the organization's projects. The Board provides comments and suggestions during these meetings and will make decisions to address various questions on issues that arise through voting on a motion, if necessary or taking actions that do not require a formal vote. All of these decisions and actions are documented in the meeting minutes.

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 are integrated with this process. In some cases, such as NEWMOA's analysis of solid waste flow in the region, 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, Terri Goldberg, has been designated as the quality contact. The Project Manager, Andy Bray, serves as the quality contact when the Executive Director is unavailable and also assists 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. Terri Goldberg is responsible for ensuring that NEWMOA Project Managers and staff assigned to Project Workgroups follow the Generic QAPP.

NEWMOA staff works with representatives of its member-states and with U.S. 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 section 1.2 for strategies) identifies broad areas of program emphasis that reflect the needs of state environmental programs. The Plan was developed by NEWMOA staff and the Board of Directors in consultation with U.S. 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 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. The NEWMOA staff and management presents drafts of these workplans and the Board votes on them as part of its annual meeting in September. No workplan is considered final until the Board votes to approve it.

#### **2.5 Project/Grant Proposals**

The NEWMOA staff discuss new project and grant proposal ideas with state Directors and U.S. EPA staff at every NEWMOA Board of Directors meeting. Ideas for proposals may come from any state, NEWMOA staff or Workgroup, or U.S. 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 using the process outlined above.

#### **2.6 Types of NEWMOA Programs & Activities That May Require Quality Management**

##### **Reports on State Laws, Regulations & Policies**

NEWMOA gathers information from the states member programs 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.

Repository of Forms Submitted by Regulated Entities on Mercury-Added Products & Database  
Laws in member-states require manufacturers and/or certain other organizations to notify them regarding the mercury content of mercury-added products. The state agencies have formed NEWMOA's program, called the Interstate Mercury Education and Reduction Clearinghouse (IMERC - see [www.newmoa.org/prevention/mercury/imerc/about.cfm](http://www.newmoa.org/prevention/mercury/imerc/about.cfm)) 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 a detailed SOP that is attached in Appendix B.

#### Regional Pollution Prevention (P2) Information Center

NEWMOA supports 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 & 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 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 are 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 & Position Descriptions**

NEWMOA currently has six levels of staff as follows:

1. Executive Director
2. Project Managers
3. Project Staff, also referred to as Specialists
4. Special Consultant (Technical and Policy)
5. Administrative Assistant
6. Interns

The following describes the minimum qualifications and job requirements for each of these levels of NEWMOA staff and the associated starting salaries. Employee compensation is 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 10 years of full time or equivalent part time professional experience in the field of environmental science, engineering, or a related field, at least five of which should be in a management capacity involving planning, budgeting, personnel management, and technical oversight of a complex project/program.

##### *Education*

An undergraduate degree with a major in environmental science, environmental policy, engineering, or a related field is required. A graduate degree in a relevant field is strongly preferred (e.g., a major in environmental science, public policy, public administration, planning, or public health).

##### *Basic Knowledge & Skills*

- Extensive understanding of and experience with federal and state waste management and waste site cleanup laws, policies and programs, including an understanding of state government processes and decision-making
- Understanding of new and emerging directions in waste management and waste site cleanup, and how state waste programs can affect and be affected by them, such as chemical management policies, pollution prevention, product stewardship/extended producer responsibility, and zero waste

- Comprehensive understanding of the challenges facing state waste programs and the benefits, incentives and methods for developing successful partnerships with stakeholders that can help state waste management programs achieve their goals
- Excellent written and verbal communications skills
- Excellent organizational skills
- Excellent facilitation, teamwork and problem solving skills
- Ability to work effectively with scientists, engineers, and policy makers
- Ability to establish effective working relationships with U.S. EPA, officials of other government agencies at all levels, and other public and private organizations with interests in NEWMOA's work
- Demonstrated ability to supervise staff
- Demonstrated ability to communicate with and to work effectively with a Board of Directors
- Understanding of non-profit management
- Demonstrated ability to supervise the financial management of the Association, and to prepare and manage budgets, grant proposals and contracts

#### **General Duties & Responsibilities**

- Identifies needs and opportunities for interstate/regional cooperation and partnerships in the waste management and related programs, in concert with the NEWMOA Directors
- Develops and implements strategic plans for interstate efforts to support state waste programs, in concert with the NEWMOA Directors
- Identifies and pursues opportunities for funding NEWMOA projects
- Manages NEWMOA workgroups of state staff and managers on particular issues
- Establishes working relationships with member state agencies, U.S. EPA, and other stakeholders with interests in NEWMOA's work
- Manages the day-to-day operation of the Association:
  - Supervises development and implementation of the annual program workplan, strategic plans and budgets
  - Oversees grants from U.S. EPA and other funding sources; ensures fulfillment of grant requirements (including submittal of progress reports and other documents)
  - Organizes and facilitates meetings of NEWMOA's Board of Directors
  - Reviews and approves policy papers, comments, and other documents submitted to state environmental officials, U.S. EPA and others
  - Supervises NEWMOA staff and contractors employed by the Association
  - Supervises preparation of NEWMOA's Annual Report, fiscal audits, and financial management activities
  - Ensures implementation of NEWMOA's Quality Management Plan and acts as "QM" contact

#### *Supervisory Controls*

The NEWMOA Executive Director works under the supervision of the Association's Board of Directors. Contract is renewed annually by the Board of Directors.

**Title: Project Manager**

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. If a Project Manager works less than 30 hours per week, they are classified as part time and are paid on an hourly basis. Part time employees are not entitled to benefits; they 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.

*Basic Knowledge & 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 & 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 workplans and budgets
- Assists with preparing U.S. 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 U.S. EPA and others as needed
- Helps prepare progress reports to U.S. EPA
- Assists with the organization of NEWMOA training programs
- Organizes training workshops, conferences, or seminars

- Prepares technical or policy documents, reports, and memos

The satisfactory performance of the above duties and responsibilities requires the employee 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 Executive Director and the Board of Directors. Job performance is evaluated by the Executive Director

### **Title: Environmental Specialist**

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

Starting Salary: To be determined by the NEWMOA Board of Directors. Benefits include vacation, personal and sick leave, health and dental insurance, and retirement contribution. If staff works less than 30 hours per week, they are classified as part time and are paid on an hourly basis. Part time employees are not entitled to benefits; they 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.

#### *Basic Knowledge & 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 & Responsibilities** (Specific duties and responsibilities to be assigned depending on the NEWMOA program)

- Assists with overall implementation of projects and project planning and reporting
- Coordinates NEWMOA Workgroup/s on particular issues
- Gathers and presents information for state members on particular topics
- Organizes Workgroup meetings and conference calls
- Conducts research to prepare policy papers and comments to U.S. EPA and others
- Prepares technical or policy documents, reports, and memos
- Prepares policy position papers, as needed
- Conducts research and prepares presentations of the results

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

### **Title: Information Technology Specialist**

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

Starting 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 five years of full time or equivalent part time professional experience in the field of computer science or website application development 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 computer science is required and may be substituted for a maximum of two years of the required experience. A graduate degree from a recognized school with a major in computer science may be substituted for a maximum of one year of the required experience.

#### *Basic Knowledge & Skills*

- Expertise in the desktop applications used in the NEWMOA Office (e.g., Microsoft Office suite)
- Ability to provide programming support for the development and maintenance of NEWMOA's website
- Ability to act as lead application developer on complex database-driven applications
- Ability to communicate effectively both verbally and in writing
- Ability to efficiently organize tasks and manage workload
- 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 & Responsibilities** (Specific duties and responsibilities to be assigned depending on the NEWMOA program)

- Maintains and improves the design and content of NEWMOA website
- Develops and maintains various database-driven web applications
- Designs new features for the website, including database and application development
- Administers the local area network for the NEWMOA office, including help desk features, options analysis for procurement of new hardware and software, and redundancy systems

The satisfactory performance of the above duties and responsibilities requires the staff person to have a basic understanding of NEWMOA's programs, organization, and policies and to be able to work effectively with the other NEWMOA employees and state and federal contacts. The ability to organize projects and perform tasks in an accurate, conclusive, and timely manner is critical.

**Supervisory Controls**

The Information Technology Specialist is under the supervision of the NEWMOA Project Managers and Executive Director. Job performance is evaluated by the Project Manager (s) and Executive Director.

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

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

Description: 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**

#### *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 & Skills*

- Good communications skills, both verbal and written
- Good organizational skills
- Good 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 & Responsibilities** (Specific duties and responsibilities to be assigned depending on the NEWMOA Program)

- Assists Project Manager and staff 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
- 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 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:** To be determined by the NEWMOA Board of Directors. Benefits include vacation, personal and sick leave, health and dental insurance, and retirement contribution. If an Administrative Assistant works less than 30 hours per week, they are classified as part time and are paid on an hourly basis. Part time employees are not entitled to benefits; they 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 office management and administration

#### *Education*

Undergraduate degree

#### *Basic Knowledge & Skills*

- Excellent communications skills, both verbal and written
- Good organizational skills
- Ability to type quickly
- Skill with word processing, spreadsheet, and other Microsoft Office software
- Ability to work effectively with a wide variety of people and juggle competing demands
- 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 handle purchasing and procurement of office supplies
- Ability to manage mailing and email lists
- Ability to track and record office activities

#### **General Duties & Responsibilities**

- Manages NEWMOA office
- Manages photocopying, printing, and faxing
- Manages accounts receivables and payables
- Helps to organize conference calls, meetings, workshops, and conferences
- Answers the phone and handles general inquiries
- Manages inventory of office supplies and materials
- Interacts with vendors and suppliers
- Prepares memos and letters
- Prepares quarterly MBE/WBE reports to U.S. EPA
- Reviews all invoices for correct signatures and codes
- Conducts mailings
- Ensures the smooth flow of work through the office
- Assists the NEWMOA staff and management with special projects

#### **Supervisory Controls**

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

#### **3.4 Professional Development & 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. Information about accessing the QMP, QAPPs, and SOPs are 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 are required to read this QMP. By integrating the QMP with NEWMOA's program and project development process, each Project Manager participates in identifying the data/information quality that are needed for each project and addresses those needs as summarized in the Generic QAPP or a SOP when necessary. NEWMOA's staff also imparts 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 & Services**

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

### **4.1 Procurement**

The procurement of goods and services is managed in accordance with U.S. EPA grant requirements applicable to states and other government entities. A copy of the current guidance from the Grants Information and Management Section, U.S. 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. In the case of purchases made through its procurement process, NEWMOA invites these providers to submit proposals to address the Association's needs. NEWMOA follows these and the other requirements identified in 40 CFR, Part 31 Section 31.36(e), and it documents its efforts to comply therewith. NEWMOA reports all MBE/WBE procurements to U.S. 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 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 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 policies call for preference to be given to purchasing goods and services from minority- and women-owned (MBE/WBE) businesses. The following are some of the MBE/WBE businesses that NEWMOA uses:

FineLine Communications  
P.O. Box P-66  
South Dartmouth, MA 02748  
Graphics design (WBE)

SoyPrint  
90 Northeast Road  
Standish, ME 04084  
Green printer toner (M/WBE)

John Leonard (temp agency)  
75 Federal Street  
Boston, MA 02114  
Clerical (WBE)

Quality Print  
108 Milk Street, Suite 3  
Westborough, MA. 01581  
Printing, copying (M/WBE)

New England Office Supply  
135 Lundquist Drive  
Braintree, MA 02184  
Office supplies (WBE)

Sandberg & Creeden  
331 Page Street, 2<sup>nd</sup> Floor  
Stoughton, MA 02072  
Auditor (WBE)

Norton Enterprises, Inc.  
358 Chestnut Hill Ave # 305  
Brighton, MA 02135  
Laser printer toner (MBE)

Sterling Printing  
214c Main Street  
Stoneham, MA 02180  
Printing, copying (MBE)

To select a vendor for good and services under \$1,000, NEWMOA solicits prices from available vendors. Single time purchases of standard items over \$1,000, such as office equipment must be supported by price and terms quotes from at least three vendors. 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.

#### **Office Supplies**

Office supplies, such as pens, pencils, copier paper, among others, are ordered through the Administrative Assistant. NEWMOA's vendor is New England Office Supplies (NEOS) in Braintree, MA. Orders for documents or reports may be charged to the employee's American Express card. Staff sometimes makes purchases with personal cash or credit cards, and they must document these for reimbursement on NEWMOA's Expense Report.

## **Element 5 - Documents & Records**

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

### **5.1 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
- Financial Reports

Materials that are three years or older are archived and stored in a storage room. All archived boxes are clearly labeled. The storage room is located near the elevator on the 6<sup>th</sup> floor of 129 Portland Street.

### **5.2 Financial Records**

Financial files are maintained by the bookkeeper and administrative assistant in a file cabinet next to the bookkeeper's desk. Copies of all electronic financial records are made weekly and are stored off site.

### **5.3 Grants/Contracts**

NEWMOA's bookkeeper maintains a file of copies of all grants and contracts in order by the number. All information pertaining to a particular grant or contract is kept in one folder.

## **Element 6 - Computer Hardware & Software**

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. Lap-top computers are also available.

NEWMOA Project Manager, Andrew Bray functions as NEWMOA's Information Management Systems Lead. Decisions about system needs and development priorities are made by the Executive Director assisted by Mr. Bray and in consultation with the staff that will be using the various applications. The purchase of computers is through the competitive process described under Procurements in Element 5 above.

Andrew Bray is also responsible for the overall operation of NEWMOA's major software applications, including its databases and its website. Nathan Bisbee, NEWMOA's Web Master assists Mr. Bray in carrying out this responsibility. The website is operated under contract with and is hosted by an internet services provider.

### **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, much of its activities are conducted under U.S. EPA grants/Cooperative Agreements or contracts 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 U.S. 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.

### **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 includes representatives of each NEWMOA state implementing the relevant mercury law, recognized that clearly defined policies, procedures, and correspondence are needed to ensure that states and registrants know precisely how IMERC's registration efforts are managed. Consequently, IMERC's Product Registration SOP is detailed to ensure consistency and predictability in the conduct of its business.

### **Element 9 - Assessment & Response**

NEWMOA's planning and management cycle is conducted annually to coincide with NEWMOA's fiscal year as outlined in Element 1. A detailed report of NEWMOA's accomplishments, for comparison to its approved workplan 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

workplan. Corrective measures are detailed in the Executive Director's annual employment contract and in each employee's performance appraisal report. Corrective measures are included in the Association's workplan for the coming year. All of these activities are conducted in the context of NEWMOA's multi-year strategic plan.

Individual projects are subjected to regular review by state Directors and state staff in the Workgroups 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 U.S. 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, U.S. 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 above 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 is planned to meet the needs and requirements of the member states and U.S. 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 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

## NEWMOA's FY 2011 Workplans

### NEWMOA FY 2011 Hazardous Waste Program & Common Measures Project Workplan

October 1, 2010 – September 30, 2011

#### **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
- Advise EPA about the need for improved training and technical assistance resources for state HW programs
- Help states to strategize and develop hazardous waste reduction activities
- Assist EPA in understanding state perspectives, needs, and issues with hazardous waste management

##### Activities:

- Complete HW component of FY 2011 NEWMOA Training Plan
- Develop SEPS project descriptions for HW Program (Project Ideas)
- Implement plans to summarize highlights of web conferences/training calls and post on NEWMOA website
- Hold 11 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 (Address HW training and technical assistance deficit with EPA HQ?)
- 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 2012 NEWMOA Training Plan

#### **EPA Region 5 States & EPA Auto body ERP Project** (funded by an EPA HQ Innovations Office Cooperative Agreement with Wisconsin DNR to be implemented through a WIDNR-NEWMOA Contract for Support Services and include funding for ERP Consortium activities)

##### 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 management and evaluation of data from baseline inspections

- Assist with development of training and outreach materials for shops
- Provide ongoing follow-up training and technical assistance to participating states and EPA Region 5, as necessary
- Assist with data collection, management, and evaluation of data from the Self-certification checklist submittals and EPA follow-up inspections
- Participate in completing quarterly reports, project report and related presentations

#### **States-EPA ERP Consortium**

- Provide administrative and staff support for states ERP Consortium
- Assist and support development of grant proposals for next steps

### **NEWMOA FY 2011 Assistance & Pollution Prevention Workplan**

October 1, 2010 – September 30, 2011

#### **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
- Provide forums for assistance & P2 programs to exchange information and leverage each other's work

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

FY 11 Activities:

- Manage NE Assistance & P2 Roundtable Steering Committee and organize 3-4 conference calls
- Organize NE Assistance & P2 Roundtable web conferences
- Organize open web conferences targeting the hospitality industry
- Organize a face-to-face meeting for EPA Region 2 programs and possibly Region 1 programs (if state travel is permitted)
- Publish two issues of *NE Assistance & P2 News*
- Manage Hospitality Workgroup and hold 4-5 conference calls
- Manage Marina Outreach Workgroup and hold 1-2 conference calls

- Conduct survey of the states to identify their training priorities to use to inform Roundtable activities
- Manage NE Assistance & P2 Roundtable, Hospitality Workgroup, Environmental Management Accounting, and Marina Workgroup listservs

Anticipated FY 11 Outcomes:

- Promote understanding of assistance and P2 programs priorities and activities among states in the region
- Improved understanding by state environmental assistance staff of the pollution prevention opportunities at targeted sectors
- Improved understanding by state environmental staff of some of the challenges and opportunities for success in their outreach and assistance activities with targeted sectors

**Pollution Prevention Resource Exchange (P2Rx)** (funded by grants from EPA Region 1-NE that are awarded to NH DES and provided to NEWMOA as contracts as well as a contract from PPRC for national website support)

Strategies:

- Work to prevent the duplication of effort on the part of states in creating P2 information resources
- Help states identify their P2 information needs and challenges and work to fill those needs
- Collect, organize, and post P2 information resources on the NEWMOA website
- Raise awareness of P2 opportunities in various sectors, institutions, and practices by improving the reach of P2 information resources
- Collaborate with other P2Rx regional information centers to exchange information on the various efforts underway throughout the regions
- Identify opportunities nationally to eliminate duplication of efforts and to leverage assistance resources and expertise
- Improve the understanding of the state assistance program staff regarding the benefits and limitations of priority P2 technologies
- Explore how and to what extent innovations and increased adoption of Web 2.0 technologies globally can be applied to NEWMOA's P2Rx efforts

FY 11 Activities:

- Administer the P2Rx Center at NEWMOA
  - Work with the NE A & P2 Roundtable Steering Committee in setting future directions for NEWMOA's P2Rx Center
  - Meet periodically with EPA Regions 1 and 2 staffs to coordinate NEWMOA's P2Rx activities with regional priorities
  - Coordinate information sharing projects and information standards with other P2Rx Centers by participating in P2Rx meetings and conference calls
  - Promote P2Rx information resources and service throughout EPA and the states
- Sustainable Hospitality
  - In coordination with the other P2Rx Centers and EPA, help to network state and local programs focused on sustainable lodging by chairing a series of conference calls and establishing online forums to enable program staff to interact with each other and their clients in real-time

- Implement a measurement data system for use by programs working with the hospitality sector, including built in calculators for turning behavior change measures into estimates of environmental outcomes
- Develop an online environmental benefits calculator for the hospitality sector
- Work with other P2Rx Centers to create a single point of access for P2Rx resources related to sustainable hospitality
- Climate Change
  - Implement webinars for assistance providers on how to work with companies on measuring their carbon footprint and setting goals for reducing it
  - Establish a clearinghouse of data and measurement tools focused on the climate impacts of materials
- Expand online virtual tradeshow for garment care technologies
- Update other NEWMOA P2Rx-funded online resources
  - Host and expand the National Mercury Reduction Programs Database; promote use of the Database by distributing marketing materials
  - Collect and republish P2-related News on the NEWMOA website as well as through the P2Rx National P2 News Service
  - Update and maintain online Calendar of events
- Respond to information requests from NEWMOA members, other P2Rx Centers, and others
- Provide web support to the National P2Rx Coordinator from PPRC through February 2011, including updates to the website and development and deployment of new applications and "widgets"

Anticipated FY 11 Outcomes:

- Increased understanding by state program staff of effective assistance and P2 strategies for targeted priority sectors and environmental issues in the region
- Improved efficiency in obtaining critical information and contacts for state assistance and P2 program staff
- Decreased duplication of effort on the part of regional, state, and local assistance and pollution prevention programs
- Improved information sharing on program challenges related to the identification, promotion, and adoption of innovative technologies

**P2 & Compliance Assistance Measurement** (funded through contract from WA DoE)

Strategy:

- Improve the ability of state P2 programs to measure their effectiveness and communicate their results

FY 11 Activities:

- Co-chair the National P2 Results Task Force
  - Lead an effort to evaluate other existing data standards and consider additional sustainability metrics for inclusion in the system
  - Chair national calls every other month, setting the agenda and leading the conversation
  - Oversee implementation of the Task Force workplan
  - Evaluate opportunities to create greater transparency within the P2 Results Data System
  - Monitor and participate in EPA development of metrics reporting requirements

- Manage the ongoing development of the National P2 Results Data System
  - Update the National P2 Results Data System to include additional sustainability metrics identified by the Task Force
  - Provide support to states for establishing direct electronic data exchanges with the National P2 Results Data System
  - Implement additional measures to create greater transparency within the P2 Results Data System
- Host the Region 1&2 module of the National P2 Results Data System and provide technical assistance to states using the System
- Distribute updated version and support state implementation of the Compliance and P2 Assistance Metrics software application
- Manage P2 and Compliance Assistance Metrics and P2 Results listservs
- Develop and populate a searchable online P2 Data Collection and Methods Calculators tool (funded by EPA Region 1 grant)

Anticipated FY 11 Outcomes:

- Increased understanding by state assistance and P2 program staff of effective measures
- Increased understanding by EPA of state assistance and P2 program perspectives
- Improved use of assistance and P2 measures, including improved communication of programs' effectiveness

**Sustainable Manufacturing – EMFACT Project** (funded by a grant from the EPA Region 2)

Strategy:

- Disseminate, promote, and provide training on the Energy and Materials Flow and Cost Tracker (EMFACT)

FY 11 Activities:

- Conduct 4-5 EMFACT training workshops
- Implement an online training module for EMFACT
- Develop two EMFACT case studies in EPA Region 2
- Seek funding to support version 2.0 of EMFACT

Anticipated FY 11 Outcomes

- EMFACT users trained
- Funding available for future upgrades to EMFACT

**NEWMOA FY 2011 Priority Chemicals Workplan**

October 1, 2010 – September 30, 2011

**Priority Chemicals 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

### **Interstate Chemicals Clearinghouse (funded by IC2 state members)**

#### Strategies:

- Support the development of alternatives assessment methods and identification of safer alternatives by state agencies
- Facilitate the sharing of data and information on use, hazard, exposure, and alternatives
- Facilitate the sharing of strategies and outcomes on chemicals prioritization initiatives
- Support state chemical policy program development and implementation
- Help build state capacity by sharing materials, strategies, and trainings
- Assist the states in meeting the relevant information needs of businesses, consumers, and the public

#### FY 11 Activities

- Hold monthly conference calls of the IC2 Planning Committee until the Board of Directors is formalized
- Implement IC2 governance proposal and develop by-laws
- Develop outreach materials & media marketing strategy for public launch of IC2
- Convene IC2 Board of Directors and IC2 Council
- Hold 2-3 conference calls of the IC2 Board
- Conduct outreach to additional states, local governments, & tribal groups, and supporting member organizations
- Launch IC2 website to public
- Organize 6 IC2 Database Subcommittee calls on state lists of priority chemicals
- Implement and post an online searchable system for accessing IC2 member state lists of chemicals and products of concern and the bases for these lists, including information on the process that the states followed to prepare their lists and the products that include the chemicals
- Organize 6 IC2 Database Subcommittee calls on chemical use reporting
- Develop white paper to explore issues and make recommendations regarding state chemical use reporting requirements
- Initiate system for coordinating manufacturer reporting on chemical use & data management system
- Organize 4 IC2 Safer Alternatives Workgroup calls

- Coordinate with Mass TURI to finalize States Alternatives Assessment Wiki and train IC2 members on Wiki use
- Present the Wiki at the 2011 National Pollution Prevention Roundtable Environmental Summit
- Organize 6 IC2 Training Committee conference calls
- Hold 4-5 training Webinars on chemical policies, programs, systems, databases, & chemical prioritization
- Organize additional IC2 Workgroups as deemed necessary by the Clearinghouse
- Hold 3 conference calls to share updates on state & EPA activities
- Develop a formal and ongoing relationship with EPA
- Maintain IC2 website
- Manage IC2 and National Chemical Policy listservs to share information on state and federal chemical policy initiatives and activities
- Publish 3 E-bulletins focusing on updates on state and local efforts to implement their chemical policy programs, including development of lists of chemicals and products of concern, green chemistry, environmentally preferable purchasing, and other policy initiatives

#### Anticipated FY 11 Outcomes:

- IC2 governance structure implemented and Clearinghouse formally launched
- Deliver training webinars
- Alternatives assessment Wiki finalized
- IC2 list of state priority chemicals database posted
- Addition state, local, & tribal members and supporting members recruited
- Initial development of a chemical use reporting system
- Improved information sharing on state and federal chemical policy initiatives and activities

#### **Mercury Reduction** (funded by IMERC-member states dues)

##### 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 recycling of mercury-containing lamps and other products determined by member interest

#### FY 11 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
- Maintain and expand mercury section of the NEWMOA website
- 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 October call

- Prepare and track IMERC state dues invoices and other funding sources
- Analyze trends in mercury use in products from 2001 – 2010.
- Welcome Michigan DEQ to IMERC

#### 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 ~8 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 new products data
- Maintain and update guidance on IMERC-member state product notification requirements on the IMERC webpage
- Develop new Notification Committee business rules and transition states to new notification e-filing system

#### IMERC Mercury-added Products Database (funded by EPA NEIEN grant awarded through Mass DEP)

- Draft updated standard operating procedures document for data entry into new Products Database
- Enter remaining 2007 mercury-added products information for approximately 50 manufacturers
- Develop new public-side website to display 2001, 2004, and 2007 products information
- Improve members-only search and reporting functionality to enable more rapid retrieval of product and product category information from the Database
- Initiate work under EPA NEIEN grant to convert to online filing of Notification Forms
- Form advisory committee of IMERC-member states and regulated community to advise the EPA-funded development of an e-filing notification system
- Hold ~4 conference calls of the NEIEN Advisory Committee
- Manage and advise contractor in e-filing and Exchange Network Node development
- Launch new e-filing system for 2010 Triennial reporting cycle
- Train states and companies on new e-filing system

#### IMERC Labeling Committee

- Address compliance assistance requests from facilities regulated by state product labeling requirements
- Send compliance letters to companies with expired alternative labeling plans
- Share alternative labeling plan applications with the IMERC Labeling Committee and hold ~4 conference calls to review applications
- 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 ~4 conference calls of the IMERC Phase-out Subcommittee
- Maintain and update guidance on IMERC-member state product bans on the IMERC webpage
- Maintain updated 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 ~2 conference calls of the state IMERC Enforcement Committee
- Coordinate state enforcement efforts related to mercury product reduction requirements

#### IMERC Education & Outreach

- Maintain overall IMERC webpage
- Develop and publish two issues of IMERC Alert with information about new e-filing system
- If necessary, update the IMERC brochure and post on the IMERC webpage

#### Anticipated FY 11 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
- Increased knowledge of overall trends in mercury use in products since 2001
- Improved mercury-added product data collection through e-filing system
- Coordinated approaches to passage and implementation of mercury product legislation

### **NEWMOA FY 2011 Solid Waste Program Workplan**

October 1, 2010 – September 30, 2011

#### **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's 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 11 Activities:

- Manage Solid Waste Steering Committee – plan information sharing conference calls on five priority topics (\$2,400-\$6,000: \$400 for each information-sharing conference call, and \$1,000 for each webinar with invited speakers) – priority topics for FY11 include: pharmaceuticals waste management; e-waste management; state solid waste plan updates and implementation; extended producer responsibility; organics recycling facility regulation; MSW incinerator ash management; regulation of waste haulers; asbestos waste management; gasification and other innovative MSW management technologies.
- Manage Auto Recycling Networking Group and listserv
- Prepare for and attend NEWMOA Directors meetings
- Maintain solid waste section of the NEWMOA website
- Address priority issues that emerge during the year, such as developing comments to EPA on proposed rules

Anticipated FY 11 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

**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 11 Activities:

- Continue to refine user interface and existing data in database
- Enter data from Pennsylvania
- Continue national outreach on database – work with remaining states to input their data to make the NEWMOA BUD Database a national repository for BUD information
- Finalize table that summarizes for each of the 50 states, the appropriate state contact for BUDs and the status each state’s BUD data

Anticipated FY 11 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 Base Grant)

#### Strategies:

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

#### FY 11 Activities:

- Manage C&D Workgroup
- Finalize and submit letter to Commissioners briefing them on NEWMOA C&D work and future priorities
- Work with EPA and others to obtain funding for follow-on work, as possible

#### Anticipated FY 11 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

### **NEWMOA FY 2009 Waste Site Cleanup & Brownfields Workplan**

October 1, 2010 – September 30, 2011

### **Voluntary Site Cleanup & Brownfields Redevelopment Program** (funded by states through a contract from MassDEP)

#### Overall Program Goals:

- Improve the efficiency and effectiveness of characterization and remediation 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 strategies for improving the effectiveness of voluntary site cleanups and redevelopment of Brownfields sites
- Develop training events that meet the technical priorities identified by the states
- Increase understanding of EPA expectations of state programs in meeting the requirements of the Brownfields legislation, including measures of program success

#### FY 11 Activities:

- Work with states to develop training on priority waste site cleanup program issues needs and organize and hold three face-to-face workshops in FY 11 – tentative topics: ecological risk assessment; an in-situ remediation technology; and characterizing and remediation dry cleaner sites
- Hold at least one webinar on an emerging issue to pilot the format – potential issues include:

- new dioxin standard and implications; 1,4 dioxane, and nanotechnology
- Hold a states/EPA Brownfields meeting 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 interface with Congress on raising the cap on 128(a) funding for state Brownfields programs
- Work with states, EPA and NJIT on increasing transparency on TSCA requirements and the regulatory process for sites with PCB contamination
- 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
- Hold 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 11 Outcomes:

- Increased understanding of EPA expectations of state programs to meet the requirements of the Brownfields legislation
- Increased understanding of TSCA requirements when PCBs are encountered, increased understanding of problems TSCA requirements present, particularly for Brownfields redevelopment projects, and identification of opportunities for greater efficiency
- Increased understanding of priority technical issues through training workshops

**MassDEP Oil Spill Act (OSA) Program Support** (funded by a contract with MassDEP)

FY 11 Activities:

- Assist with organizing Oil Spill Advisory Committee meetings
- Assist with planning and implementing response training as needed
- Assist Mass DEP with drafting Report to the OSA Advisory Committee and Legislature on Accomplishments under OSA
- Assist with implementing a single year budget and workplan format

Anticipated FY 11 Outcomes:

- Mass DEP ability to meet OSA legislative mandates with limited staff will be augmented

# Appendix B

## Procedures & Policies of the IMERC Notification Committee

Updated July 2010

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, Louisiana, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont.
- The 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 NEWMOA 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, NEWMOA 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 in the IMERC area of NEWMOA's website in a variety of electronic formats to facilitate compliance by the reporting organizations and manufacturers.
- IMERC has established hard copy master files 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 NEWMOA staff makes copies of the file for the some members of the Notification Committee, scans a copy for those states that wish to receive the Forms electronically as a PDF file, 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 organizations, or trade organizations, the staff makes both electronic and hard copies of them for each member of the IMERC Notification Committee and sends them as a batch to the Committee members approximately two weeks prior to the group's next conference call. As of July 2010, Louisiana, Maine, and Massachusetts receive the Forms as PDF files. Connecticut, New Hampshire, New York, Rhode Island, and Vermont receive hard copy Forms.
- NEWMOA staff set the date/time of the Notification Committee conference calls at a time that is convenient for as many members of the Committee as possible. The staff sends possible meeting dates to the members using "Meeting Wizard." Based on responses, staff select the date when the most members will be available.
- A few working days prior to the conference call, the NEWMOA 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, NEWMOA staff corresponds with the Committee on issues and questions that arise, primarily via e-mail.
- NEWMOA 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. The staff also provides background information or reference to prior determinations, if appropriate. At the decisions points during the call, the 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 NEWMOA staff facilitates the calls, they are not involved in its decisions.

- NEWMOA 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. NEWMOA staff updates call notes with subsequent email correspondence when relevant to the decisions made during the call.
- After the 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 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 NEWMOA 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. If the products are subject to phase-out or product ban in any IMERC states, those states and the effective dates of the phase-out/ban are also listed. 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 NEWMOA 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 email. If the requested corrections are very minor, NEWMOA staff may call or email 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 email 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 NEWMOA staff sends an email or places a phone call to the company or organization's contact person to directly discuss the problem with the Form. The email is cc'd to the IMERC Notification Committee, and the response is forwarded to the group as well. The staff takes notes on the results of any phone conversations and reports on their results to the Committee via email 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 NEWMOA 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/manufacturer 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.
- NEWMOA staff keeps copies of all of the correspondence—completion letters, comment letters, and emails—in a file for each reporting organization or manufacturer.

Mercury-Added Product Database:

- The IMERC Notification Committee has worked with the NEWMOA 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 in the IMERC area of the NEWMOA website.
- 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 NEWMOA staff checks to see that the information on that company's name, address, phone number, fax number, contact person and their title, web site, and email address are the same as the information stored in the Mercury-Added Product Database. If the Form is from a new company, staff add the company and contact information to the database.
- After a Mercury-Added Product Notification Form has been approved by the IMERC Notification Committee and a "completion" letter sent, the NEWMOA 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 email or a letter (if no email 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 email 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 email 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. Ultimately, the NEWMOA staff decides how a product is ultimately categorized, based on both historic knowledge of all of the products that have been reported and the data analysis of the information in the database that relies on categorization in general product categories.
- 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 next was 2004 (Forms were due in April 2005) and then 2007 (Forms will be due April 2008). For the 2010 reporting cycle, NEWMOA will be developing an e-filing system through a grant provided by EPA’s NEIEN program. As of July 2010, the NEWMOA staff was preparing a RFP to select a vendor to help with this effort. The e-filing goes along with the database redesign that was completed in 2010, allowing IMERC to enter 2007 Triennial year data.
- 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  
Segall, MA DEP  
Pettit, NYS DEC  
DEC

Enid Mitnik, ME DEP  
Stephanie D'Agostino, NH DES  
Beverly Migliore, RI DEM  
Lori  
Peter  
Karen Knaebel, VT

## 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](http://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](http://www.dep.state.ct.us/wst/mercury/mercury.htm)

Maine – [www.maine.gov/dep/mercury/products.htm](http://www.maine.gov/dep/mercury/products.htm)

Massachusetts – [www.mass.gov/dep/toxics/priorities/priorities.htm#hgresults](http://www.mass.gov/dep/toxics/priorities/priorities.htm#hgresults)

Minnesota – [www.pca.state.mn.us/oea/](http://www.pca.state.mn.us/oea/)

New Hampshire – [www.des.state.nh.us/nhppp/mercury.htm](http://www.des.state.nh.us/nhppp/mercury.htm)

New York – [www.dec.state.ny.us/website/dshmr/redrecy/mercury.htm](http://www.dec.state.ny.us/website/dshmr/redrecy/mercury.htm)

Rhode Island – [www.dem.ri.gov/topics/mercury.htm](http://www.dem.ri.gov/topics/mercury.htm)

Washington – [www.ecy.wa.gov/mercury/index.html](http://www.ecy.wa.gov/mercury/index.html)

Vermont – [www.mercvt.org](http://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](http://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](http://www.dep.state.ct.us/wst/mercury/mercury.htm)

Maine – [www.maine.gov/dep/mercury/products.htm](http://www.maine.gov/dep/mercury/products.htm)

Massachusetts – [www.mass.gov/dep/toxics/priorities/priorities.htm#hgresults](http://www.mass.gov/dep/toxics/priorities/priorities.htm#hgresults)

Minnesota – [www.pca.state.mn.us/oea/](http://www.pca.state.mn.us/oea/)

New Hampshire – [www.des.state.nh.us/nhppp/mercury.htm](http://www.des.state.nh.us/nhppp/mercury.htm)

New York – [www.dec.state.ny.us/website/dshm/redrecy/mercury.htm](http://www.dec.state.ny.us/website/dshm/redrecy/mercury.htm)

Rhode Island – [www.dem.ri.gov/topics/mercury.htm](http://www.dem.ri.gov/topics/mercury.htm)

Washington – [www.ecy.wa.gov/mercury/index.html](http://www.ecy.wa.gov/mercury/index.html)

Vermont – [www.mercvt.org](http://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](http://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](http://www.dep.state.ct.us/wst/mercury/mercury.htm)  
Maine – [www.maine.gov/dep/mercury/products.htm](http://www.maine.gov/dep/mercury/products.htm)  
Massachusetts – [www.mass.gov/dep/toxics/priorities/priorities.htm#hgresults](http://www.mass.gov/dep/toxics/priorities/priorities.htm#hgresults)  
Minnesota – [www.pca.state.mn.us/oea/](http://www.pca.state.mn.us/oea/)  
New Hampshire – [www.des.state.nh.us/nhppp/mercury.htm](http://www.des.state.nh.us/nhppp/mercury.htm)  
New York – [www.dec.state.ny.us/website/dshm/redrecy/mercury.htm](http://www.dec.state.ny.us/website/dshm/redrecy/mercury.htm)  
Rhode Island – [www.dem.ri.gov/topics/mercury.htm](http://www.dem.ri.gov/topics/mercury.htm)  
Washington – [www.ecy.wa.gov/mercury/index.html](http://www.ecy.wa.gov/mercury/index.html)  
Vermont – [www.mercvt.org](http://www.mercvt.org)

cc: Tom Metzner, CT DEP  
Enid Mitnik, ME DEP

Lori Segall, MA DEP  
John Gilkeson, MN PCA

Stephanie D'Agostino, NH DES  
Beverly Migliore, RI DEM  
Maria Victoria Peeler, WA DEC

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, 6<sup>th</sup> 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  
Segall, MA DEP  
Pettit, NYS DEC  
Knaebel, VT DEC

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

Lori  
Peter  
Karen

## Attachment E: Sample Comment Letters

### Sample Letter #2

{Date}

IMERC  
c/o NEWMOA  
129 Portland Street, 6<sup>th</sup> 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](mailto: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  
Segall, MA DEP  
Pettit, NYS DEC  
DEC

Enid Mitnik, ME DEP  
Stephanie D'Agostino, NH DES  
Beverly Migliore, RI DEM  
Lori  
Peter  
Karen Knaebel, VT

## Attachment E: Sample Comment Letters

### Sample Letter #3 – Examples for Lamp Manufacturers

{Date}

IMERC  
c/o NEWMOA  
129 Portland Street, 6<sup>th</sup> 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  
Segall, MA DEP  
Pettit, NYS DEC  
DEC

Enid Mitnik, ME DEP  
Stephanie D'Agostino, NH DES  
Beverly Migliore, RI DEM  
Lori  
Peter  
Karen Knaebel, VT

## Attachment E: Sample Comment Letters

### Sample Letter #4 – Examples for Auto Manufactures

{Date}

IMERC  
c/o NEWMOA  
129 Portland Street, 6<sup>th</sup> 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 Adam Wienert at awienert@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  
Segall, MA DEP  
Pettit, NYS DEC  
DEC

Enid Mitnik, ME DEP  
Stephanie D'Agostino, NH DES  
Beverly Migliore, RI DEM  
Lori  
Peter  
Karen Knaebel, VT

**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	Enid Mitnik, ME DEP	Lori
Segall, MA DEP	Stephanie D'Agostino, NH DES	Peter
Pettit, NYS DEC	Beverly Migliore, RI DEM	Karen Knaebel, VT
DEC		

## **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 are easier to manage than 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 & 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 is 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 & 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 & 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 is 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 documented 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 is 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 & 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 it 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 owns

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 reviews the hub for clerical and grammatical accuracy, literary flow, etc. Web technical specialists 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, & Features of Links/Resources**

### **Core Links & 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 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:

- Listservs
- 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 may 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 & 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 prints 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 & 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 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 intra-hub 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 do not check as to whether or not these items are here. However, if they are present, we check that any references to them are consistent with the narrative and that the links work. Additionally, all links – list of links – are 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 can 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 practices 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 & 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 is combined 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 is commonly 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) limits the types of data collected. Therefore, in the case of program information, P2Rx provides 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.)
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- Hotline#
- FAX#
- Email#
- \*URL#
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- FAX#
- Email
- Primary (Y/N - is this person the primary contact for the org)
- \*OrgID (relates contact to an organization)

- |   |  |
|---|--|
| <ul style="list-style-type: none"><li>• *Services (<i>see vocabulary</i>)</li><li>• *Clients Served (<i>see vocabulary</i>)</li></ul> |  |
|---|--|

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

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 also allow self-described expertise (sector, process, materials) using their own vocabulary. Terms submitted by programs that are not currently in the Thesaurus are 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 & 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 offers the user both simple and advanced search options. The simplest level of searching includes the following options:

- Search by state (drop-down list)
- Search by area of expertise (drop-down list; areas offered are 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 inputs data as they know or can find on the organization's web site. The program is then asked to verify the information for accuracy and completeness. At least annually, P2Rx Centers contact each program they have cataloged to check accuracy and update information as needed. Organizations are also 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 submit updates in a format prescribed by the managing P2Rx Center. A data entry form allows the national directory to be updated whenever a correction or addition is made to regional data.

# Appendix E

Northeast Waste Management Officials' Association (NEWMOA)

## Generic Quality Assurance Project Plan

2011 - 2016

### Project Manager Contact Information:

Terri Goldberg  
Phone: 617. 367. 8558 ext. 302  
tgoldberg@newmoa.org

**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**

### PROJECT MANAGEMENT

#### A1. Approval Sheet



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Terri Goldberg, Executive Director  
Quality Assurance Officer

July 7, 2011

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Date



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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).

### **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 is centralized so the QA Officer can ensure that all personnel are using the most recent revision (see Section A9).

### **A4. Project/Task Organization**

State agency Program Directors responsible for initiating and approving NEWMOA projects are listed in the table below and are shown in the organization chart on page 97. The 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 Board of Directors. At each of the NEWMOA Board meetings, NEWMOA management and staff present reports on the status of the organization’s projects. As part of these project updates, the staff shares copies of NEWMOA’s near final draft reports or data presentations with the Board. If necessary, sometimes the Board will take a formal vote to approve a document or presentation. However, usually, the Board agrees to take action and provide comments and suggestions on the draft materials within a specified period of time. If they do not send the NEWMOA staff any comments or suggestions, the report, presentation, or document is considered to be approved and final. If they do send comments and corrections, the NEWMOA staff makes the appropriate corrections if they do not alter substantially the results. If the corrections or changes do alter the results significantly, the staff will consult with the project Workgroup to help resolve any questions and will send the material back to the Directors via email for final concurrence. All of these decisions and actions are documented in Board meeting minutes. If a document needs to be reviewed and approved between Board meetings, NEWMOA staff will conduct the Board review process via email. The email exchange provides the documentation of these interactions and approvals.

<b>Project Implementation Personnel</b>		
<b>Individual</b>	<b>Role in Project</b>	<b>Organizational Affiliation</b>
Terri Goldberg	Project Manager & QA Officer	NEWMOA
Yvonne Bolton	State Project Co-Lead	CT DEP
Robert Kaliszewski	State Project Co-Lead	CT DEP
Julie Churchill	State Project Lead	ME DEP
Sarah Weinstein	State Project Lead	Mass DEP

Michael Wimsatt	State Project Lead	NH DES
Michael DiGiore	State Project Lead	NJ DEP
Peter Pettit	State Project Lead	NYS DEC
Ron Gagnon	State Project Lead	RI DEM
George Desch	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 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 U.S. EPA when a project is funded by U.S. EPA

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

U.S. EPA staffs are active participants in projects through review of annual NEWMOA Workplans that describe all planned projects and participation in quarterly NEWMOA Board meetings, where the project status is reviewed and oversight is exercised by state Program Directors. This support and participation may include:

- Assistance in coordination with the participating states
- Review of drafts
- Participation on Workgroup conference calls

#### **A5. Background & Project Goals & Objectives**

As discussed in elements 2-5 of NEWMOA’s Quality Management Plan, NEWMOA does not collect, contract for the collection, process, or report quantitative scientific data that is gathered for the measurement and reporting of contaminant levels in environmental media, and currently has no plans to do so. NEWMOA’s programs and projects focus on narrative material of policy or programmatic significance. When NEWMOA collects and presents quantitative data, they are originally gathered by others, and the Association presents the information along with appropriate qualifications on data quality. Ensuring an appropriate level of data quality in NEWMOA’s programs is relatively transparent. The adequacy of data quality is determined and expressed by NEWMOA’s clients/members as satisfaction or dissatisfaction with the product, report, or activity.

To ensure that its projects have clear goals, objectives, and anticipated results, NEWMOA's Workgroups develop these at the beginning of each project. The following provides examples of goals, objectives, and anticipated results statements that NEWMOA utilizes for its projects:

Example of Project goals:

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

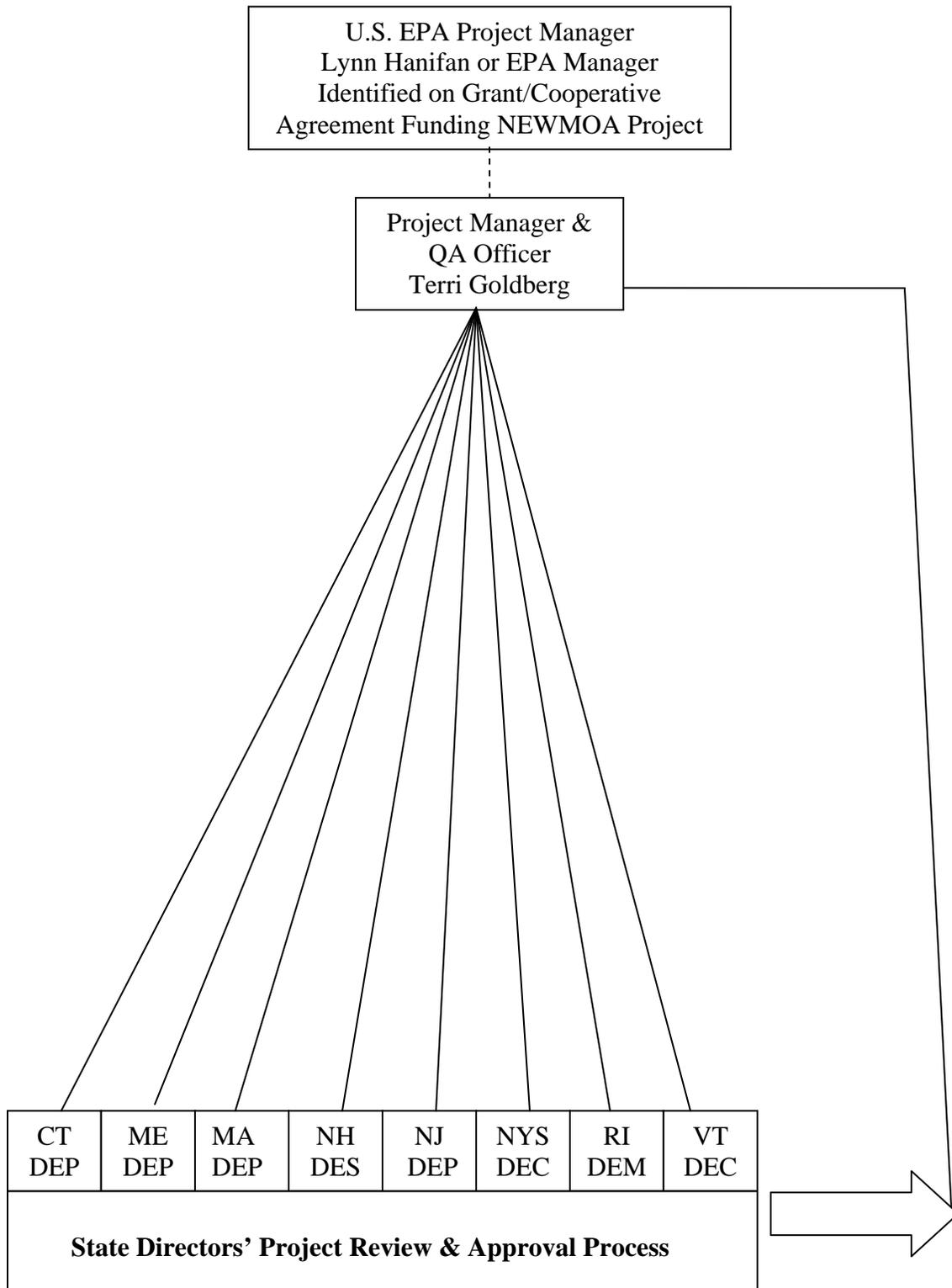
Examples of Project objectives:

- Assist states in detecting trends concerning waste and materials management
- Assist states in detecting and investigating the reasons for differences among states
- Assist states in setting individual and joint state priorities

Examples of anticipated Project results:

- Improved ability of state managers to understand programmatic and waste management differences among states
- Facilitate comparisons of the effectiveness and efficiency of different state strategies
- Improved ability to detect and correct data inconsistencies and improve data gathering procedures

### Generic Project Organizational Chart



## **A6. Project & Task Description: Summary Workplan & Quality Assurance Provisions**

### **Overview of QA Approach**

The Project Manager and each of the participating state Workgroup or Committee member is generally familiar with the quality issues related to the secondary data that are used in a given project. State Program 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 are examined at the outset of the project during the kickoff Workgroup meeting. The state participants 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 are 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 agree upon criteria that govern the extent to which data submitted by states under the project is acceptable for use in a NEWMOA project.

### **Summary Generic Workplan**

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, for some projects a number of these activities could occur in parallel.

## **A7. Quality Objectives & Criteria**

NEWMOA's project Workgroups review the methodology used for obtaining 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 are documented in the official minutes of quarterly NEWMOA Directors' meetings that are submitted to U.S. EPA Regions 1 and 2.

## **A9. Documents & Records**

Decisions concerning the initiation and management of projects covered by this QAPP are documented in the official minutes of quarterly NEWMOA Directors' meetings that are submitted to U.S. EPA Regions 1 and 2 as a condition of grants.

Accomplishments/milestones concerning the projects covered by this QAPP will be reported in the briefing materials provided to state and U.S. EPA participants for each NEWMOA Directors' meeting, and also in grant reports to U.S. EPA Regions 1 and 2.

### Report format/information

The project Workgroup will determine an appropriate reporting format(s) for written material and data as part of the project development elements described in this plan, subject to approval by the NEWMOA 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 & distribution

The QAPP shall govern the development of all NEWMOA projects. 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 & Acquisition**

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). Sections B1 – B8 and C1- C2 of this guidance document are not relevant to NEWMOA projects, since only secondary data are being collected and analyzed under this generic QAPP.

### **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 & 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 & 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 & 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 & 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 are provided by participating states, or obtained from third parties either voluntarily or as directed by state laws/regulations. Data are accepted upon assurance by participating state agencies 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 & 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 & Evaluation**

### **D1. Data Review, Verification, & Validation Criteria**

State Program Directors will assure that data are collected in accordance with the criteria agreed to by the Workgroups and that the 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 & 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 discusses 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.