OUR PROBLEM:

Low-population, but high-priority, sectors (LQGs, TSDs)

- measurably improved compliance rates through a traditional inspection program
- high inspection frequency (~1.5 FTE = 100%/3 years/LQGs; 75%/yr/TSDs)

High-population SQG universe, also high priority

- NO improvement in compliance rates
  - Despite more (~2 FTE) resource investment of staff
  - But low inspection frequency (~2 FTE = 100%/8 years)
  - Additional resources? Forget it.

Needed another method

- Increase the inspection rate
- Increase the regulatory sophistication
- Compensate for high staff turnover at these small facilities
- Without increasing our staff
WHY ARE SQGs HIGH PRIORITY?

LQGs
- ~115 Total
- Subtracting off the top 5, bottom 110 = 10,000 tons/year of hw
- Generally larger companies; value compliance
- Generally stable, well-trained environmental staff

SQGs
- ~600 Total
- 8,000 tons/year hw
- Smaller companies; compliance is lower priority
- High staff turnover
- 6x more locations; significant amount of waste; more variety of wastes; limited training for staff; unsophisticated facilities = **HIGH RISK!!!**

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**LQGs:**
~115 facilities  
~40 inspection/yr  
~35% coverage/yr  
~100%/3 yrs

**SQGs:**
~600 facilities  
~80 inspection/yr  
~13% coverage/yr  
~100%/8 yrs
OUR OPTIONS:

Mass-mailings  
We tried this and measured this; it failed miserably

Trainings  
We have been doing this; popular w/ business, but no measured compliance rate improvement

Self-Certification  
Worked wonderfully!!

SELF-CERTIFICATION

Compliance checklist sent to every sector member each year
  • w/ instruction booklet/guidance document

Each facility required to complete checklist and submit it back to our department
  • 2007 – regulatory requirement added
  • Electronically or hard-copy

HW inspectors choose statistically significant # of random facilities to inspect using the same checklist
  • 90% confidence sample set represents total population
  • With no more than a 10% margin of error

Results compared and evaluated
CHECKLIST

Yes = Compliance
No = Non-compliance
N/A = Not applicable

HISTORY OF SELF-CERTIFICATION
### EVALUATING COMPLIANCE RATES

Even though we make all SQGs self-certify – we do not use their data to calculate compliance rates

**We use only the inspector data!**
- Can facilities be trusted to honestly assess and report their compliance?
- Inspectors are better at finding non-compliance
- Self-certification becomes **only** a training vehicle

**Compliance rate across SQG Sector**
**Compliance rates by checklist question (reg. reqmt.)**
EVALUATING COMPLIANCE RATES

Compliance rate across SQG Sector

Compliance rate = # of facilities with 100% “Yes” and “NA” answers divided by total # of inspected facilities

Compliance rates by Checklist question (reg reqmt)

Non-compliance rate = # of “No” answers to a given question divided by total # of “Yes” and “No” answers (“NA” answers not included)
COMPLIANCE RATE ACROSS SQG SECTOR

SQG Self-Certification Program
Percent of SQG facilities 100% compliant with all hazardous waste regulatory requirements

SQG COMPLIANCE RATE BY REGULATORY REQUIREMENT
EFFECTS ON SQG ENFORCEMENT

Temporary Increase in Warning Letters

Significant Decrease in Compliance Orders
DRY CLEANERS

• Includes **ALL** dry cleaners – SQGs and CESQGs

• All SQG dry cleaners have been subtracted from the SQG self-certification pool

DRY CLEANER COMPLIANCE RATE BY REGULATORY REQUIREMENT
COMPLIANCE RATE BY REQUIREMENT (DRY CLEANERS)

2009  2010  2011

DC compliance rate = 95%  DC compliance rate = 93%  DC compliance rate = 90%

COMPLIANCE RATE BY GROUP (DRY CLEANERS: HW REQUIREMENTS)

2009  2010  2011

DC compliance rate = 95%  DC compliance rate = 93%  DC compliance rate = 90%
COMPLIANCE RATE BY GROUP (DRI CLEANERS: AIR REQUIREMENTS)

2009  2010  2011

DC compliance rate = 63%  DC compliance rate = 63%  DC compliance rate = 47%

KEYS TO SUCCESS

A regulation making this a requirement

Careful project set-up
- Prior sector outreach
- Question wording/instruction wording
- Inspector Training

Constant project monitoring
- Getting high % checklist return rate (Using enforcement if needed)
- Adequate number of follow-up inspections
- Evaluating results
WHERE ELSE COULD THIS WORK?

Large universes with low inspection rates
- Where you care about improving compliance

Where compliance “looks the same” everywhere
  i.e., few site-specific requirements (like permits)

Single or Multi-media regulatory obligations
  - School chemicals/school safety/school radon
  - Hospitals/Nursing homes
  - Etc.

SQG SELF-CERTIFICATION REPORT

QUESTIONS?

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