



May 12, 2014

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Dear Administrator Spalding:

I am writing to request your assistance in reviving and strengthening an important area of collaboration between EPA and the New England states. NEWMOA and EPA Region 1 have worked closely together on a number of important hazardous waste issues for many years. We greatly value our partnership with your Office and appreciate the Region's support for NEWMOA. In particular, we believe that this relationship is critical for effective implementation of federal and state laws governing hazardous waste management. We are writing to request that your Office reinforce this relationship through greater involvement in the planning and execution of annual training that NEWMOA provides for state hazardous waste inspectors.

We believe that NEWMOA's annual hazardous waste training is critical for our enforcement staff for a number of reasons. RCRA program requirements are constantly evolving to respond to new circumstances and technologies, and keeping up with these changes is challenging for state field staff. For many state hazardous waste inspectors, NEWMOA's annual workshops are their only face-to-face opportunity to keep informed about changes in federal RCRA regulations, policies, and current thinking on how to apply the rules to specific situations encountered in the field. Our RCRA field staff report that they highly value these annual workshops. Specifically, they report that they value most the opportunity to meet, learn from, and network with EPA Regional staff in person.

In recent years, state agencies have experienced significant cuts to their RCRA programs and are experiencing considerable turn-over in hazardous waste program staff due to retirements and other changes. The NEWMOA states know from long experience that the strength of these programs is vital, not only to ensuring high rates of compliance, but in preventing the creation of contaminated sites that pose public health, environmental, and economic risks in our communities. We are committed to maintaining and continually improving the capacity of regulatory, compliance, and enforcement staff to implement the federal and state hazardous waste programs. Training on existing and new hazardous waste regulations and program elements is critical to our efforts to maintain the strength of state programs.

We recognize that EPA Region 1 has experienced budget cuts and has an ambitious RCRA enforcement agenda. However, we believe that EPA Regional assistance with training state enforcement staff must be a priority if we are to ensure that state agencies continue to implement effective hazardous waste compliance programs. Moreover, we believe that the relatively modest investment of federal staff time needed to provide this assistance pays huge dividends in ensuring a competent, well-trained, and professional community of state hazardous waste

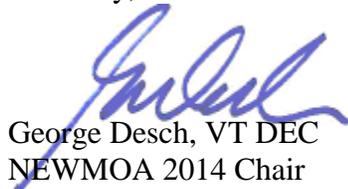
inspectors across the region. EPA assistance can also help ensure greater consistency in program implementation throughout the region. There are many intangible benefits to face-to-face interaction between EPA and state staff. It can be important for staff to have a sense for who the EPA experts are in various program topics and to put a face to a name. Simply stated, your staff's expert assistance helps our inspectors do their jobs more effectively, and is one of the most valuable services that they can provide.

The EPA Region 1 States/EPA RCRA meetings that have been organized by Lisa Papetti and held twice a year since January 2007 have been an excellent way for attendees to discuss and coordinate on topics of mutual interest. The working relationships between EPA and state program managers that have developed from these meetings is greatly beneficial. We would like to see these kinds of interactions expand to a broader group of state participants, particularly field staff, through NEWMOA's annual hazardous waste inspector workshops.

In recent years, NEWMOA has asked EPA Region 1 RCRA enforcement staff to make presentations at its annual workshop on the federal hazardous waste organic air emissions rules and other topics of interest to our members. The Region declined these invitations. Meanwhile, EPA continues to encourage our states to adopt the AA, BB, CC air emissions and Land Disposal Restrictions rules. Many of us have responded that our staff needs training on these complex rules to consider applying for authorization. State inspectors are also interested in hearing from EPA inspectors about important cases that illustrate key RCRA issues, such as the results of regional inspections of hazardous waste treatment, storage, and disposal (TSD) facilities. State programs have identified these topics as priorities for NEWMOA's workshop agenda in June 2014. We would like to explore ways in which we can work together to ensure that our hazardous waste inspectors benefit from the wealth of knowledge and experience of your staff. We would welcome the opportunity to discuss the hazardous waste training needs of our members with you and your program managers.

We appreciate your consideration of the concerns and suggestions outlined in this letter. NEWMOA is committed to continuing to support our relationship with the Region, and we look forward to working with you and your staff on this important topic. Terri Goldberg, NEWMOA's Executive Director, will be happy to discuss next steps. She can be reached by email (tgoldberg@newmoa.org) or by telephone (617-367-8558 x302).

Sincerely,



George Desch, VT DEC
NEWMOA 2014 Chair

Cc: Beth Deabay, EPA Region 1
Mary Jane O'Donnell, EPA Region 1
Lisa Papetti, EPA Region 1