

September 2021



QUALITY MANAGEMENT PLAN

2021 – 2025


Terri Goldberg, Executive Director, NEWMOA 9/16/2021
Date

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Quality Management Plan for the Northeast Waste Management Officials' Association (NEWMOA)

Background

The Northeast Waste Management Officials' Association (NEWMOA) is a 501 (c) (3) 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 environment agency programs that address pollution prevention, toxics use reduction, sustainability, materials management, hazardous waste, solid waste, emergency response, waste site cleanup, underground storage tanks, and related environmental challenges 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.

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 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 & Goals

NEWMOA provides a strategic forum for effectively solving environmental problems through collaborative regional initiatives that advance pollution prevention and sustainability, promote safer alternatives to toxic materials in products, identify and assess emerging contaminants, facilitate adaptation to climate change, mitigate greenhouse gas sources, promote reuse and recycling of wastes and diversion of organics; support proper management of hazardous and solid wastes, and facilitate clean-up of contaminant releases to the environment.

NEWMOA's long term goals are to:

- Support and strengthen state efforts to implement policies, regulations, and programs
- Promote interstate coordination and develop innovative strategies to solve critical and emerging environmental problems
- Develop and enhance the capabilities and knowledge of state officials so that they are well trained, able to adjust to rapid changes in technology, and respond effectively to emerging environmental challenges
- Articulate state program views on federal policy developments, programs, and rulemakings
- Cultivate and enhance relationships among member states, federal agencies, colleges and universities, and stakeholders
- Engage with and educate the regulated community and the public

NEWMOA's core programs focus on:

- Pollution Prevention (P2) and Sustainability
- Hazardous Waste
- Solid Waste and Sustainable Materials Management (SMM)
- Waste Site Cleanup
- Interstate Mercury Education and Reduction Clearinghouse (IMERC)
- Interstate Chemicals Clearinghouse (IC2)
- Cross Program Initiatives

The group achieves its goals by:

- Managing and sharing information and data
- Providing training and assistance
- Facilitating state and federal agency interaction
- Conducting research

NEWMOA develops and supports forums that enable its members to share resources and lessons learned so they can benefit from each other's successes and experiences, thereby enhancing their programs. It also provides a venue for sharing different approaches and solutions to new challenges facing states.

NEWMOA coordinates examination of common emerging environmental challenges; recommends unified regional positions to federal and state policy makers; and develops and helps implement coordinated regional approaches and programs. The organization identifies and

defines emerging issues, particularly those that are appropriate for regional cooperation and problem solving.

In many cases, state agencies are more effective at solving their environmental problems by cooperating regionally than by working individually. When NEWMOA's members determine that a waste management, P2, site cleanup, toxics reduction, and environmental assistance program would benefit from such regional cooperation, the Association can decide that it should undertake an initiative and seek funding to support the activity.

1.2 Services & Program Areas

In Fiscal Year 2018, the NEWMOA Board of Directors established the list of core services outlined below to help achieve the Association's goals. The Board unanimously approved a motion to adopt an updated Strategic Plan at their meeting on December 14, 2017, which covers FY 2018-2022. In the fall of 2021, NEWMOA's Board will initiate a strategic planning process to update and revise its prior Plan. This new Plan is scheduled for completion and adoption in calendar year 2022. It will cover the five-year period, 2023-2027.

NEWMOA develops program and project specific goals, strategies, and activities in its annual workplans. These annual workplans are developed through consultation with Workgroups and Steering 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 and relevant Workgroups/Committees make revisions based on their comments, and the Board votes on a revised workplan during their next meeting. These decisions are recorded in the minutes of the Board meetings.

NEWMOA provides a number of core services that support all of its program areas. The core services include:

- Information and data collection, sharing, and analysis
- Training and assistance
- Coordination
- Research

Over the past 35 years, NEWMOA's members have relied on the Association to support their efforts to develop and implement regulatory and non-regulatory programs. NEWMOA has focused its efforts on identifying and creating the support services that state programs need to successfully implement their regulatory mandates and achieve their goals. By providing the following functions, the Association helps its members be more efficient and effective.

Managing & Sharing Information

NEWMOA collects, analyzes, and shares information and data and helps states develop approaches and tools for program implementation, measurement, analysis, and evaluation. These services:

- Promote greater efficiency and avoid duplication of effort by individual states

- Help state programs identify opportunities for regional cooperation
- Promote consistency in data definitions and collection
- Assist with program evaluations
- Provide information and analysis for individual state program decision-making and planning
- Help demonstrate progress toward strategic goals of the Association and its members

Providing Training & Assisting Staff

Maintaining the expertise and knowledge of professional staff and management is important to the delivery of effective environmental services and programs. NEWMOA provides a variety of training opportunities for members to help them maintain their standards for Agency performance. Because many of the state waste management, waste site cleanup, toxics reduction, and pollution prevention programs 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 forum for its members to learn from each other and improve their management, technical, and other professional skills.

Facilitating State & Federal Agency Interaction

From its inception, the Association has facilitated its members' interactions with key federal agencies. NEWMOA's members recognize that their ability to effectively advise U.S. EPA and other federal agencies is enhanced when they can find areas of consensus on key regulatory and policy issues and present those views as a unified position. They rely on the Association to share their comments, viewpoints, and recommendations on national environmental issues and to help them learn from each other. When there is a uniquely regional perspective or concern regarding an environmental problem, the Association facilitates an effort to articulate that view and share it with appropriate national groups and agencies. NEWMOA often develops these consensus positions in collaboration with the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) and other organizations as appropriate and communicates those positions to U.S. EPA and other federal agencies.

Conducting Research

Conducting research on common issues and "best practice" options is essential to helping state programs maximize their efficiency and effectiveness. NEWMOA prepares reports, fact sheets, data analysis presentations, and other research-based materials for its members and others. Researching priority topics can be more efficient when conducted regionally than when undertaken by individual state programs.

Procuring Resources

Procuring the necessary resources to carry out NEWMOA's priorities is a critical function. NEWMOA seeks funding through grants from federal agencies, dues and contracts with member states, grants from private foundations, and other private sector sources. Individual member states have also used NEWMOA's resources to assist with particular projects. In most cases, the results of the Association's projects for individual states are shared with and benefit the other members.

All of these core services are designed to help states implement their waste management, P2, toxics reduction, and waste site clean-up programs. Such support helps programs develop and maintain staff competency, ensures that they are aware of the regulatory requirements and management approaches of neighboring states for similar activities, and reduces duplication of effort on research and other activities.

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 (QA) Policies are:

- a. All environmental data generated for or by the Association's projects/activities is of known and acceptable quality. This quality and the associated level of effort of the required QA activities is designed to meet the needs of each program's intended use of the data. The information developed for all secondary data is documented and available.
- b. An acceptable and cost-effective program of QA activities is developed and implemented at the onset of each NEWMOA project that includes secondary data to help ensure that the necessary level of data quality is achieved.
- c. All NEWMOA projects or activities that gather, compile, and report on data are 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. These data review SOPs are updated by NEWMOA staff in consultation with its Workgroups on an as needed basis, when the staff and Workgroup members make any changes to the covered process. NEWMOA has also developed and follows a number of SOPs that outline various administrative and finance functions, such as issuing invoices for dues and planning Board meetings. These SOPs are updated by NEWMOA staff on an as needed basis, when staff make any changes to the covered process.
- d. All projects that support externally generated environmental data through contracts, grants, or interagency agreements 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 NEWMOA Board of Directors consists of the Directors of the member state solid waste, hazardous waste, waste site cleanup, emergency response, pollution prevention, toxics reduction, and underground storage tank programs (www.newmoa.org/about/board.cfm). This group establishes the budget, policies, and programs of the Association.

Three members of NEWMOA's Board serve on its Executive Committee, including the Chair, Vice Chair, and Treasurer rotating on an annual basis, as dictated by the Association's By-laws.

Board oversight/governance is exercised primarily at seven regular Board meetings held each year. Generally, the annual budget, staffing, annual workplan, and individual projects are authorized, reviewed, and decided on 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 Project Managers and staff.

NEWMOA has established Program Area Steering Committees – Solid Waste and SMM, Hazardous Waste, Waste Site Cleanup, P2 and Sustainability, IMERC, and IC2 – that report to the Board and perform the following tasks:

- Help shape NEWMOA’s multi-year strategic plans
- Develop annual workplans
- Oversee program area projects and activities
- Share information on state and U.S. EPA efforts
- Develop ideas and strategies to address emerging issues
- Form working groups
- Prepare comments on federal policies

Each Program Area Chair reports to the Board during the Board meetings. In each Program Area, NEWMOA supports Workgroups that implement projects and activities.

NEWMOA’s Steering Committees and Workgroups implement its Strategic Plan through their annual workplans, which are reviewed and decided on by the NEWMOA Board in September. For high priority projects, NEWMOA’s Workgroups develop detailed grant proposals and project plans that describe the problem the project is designed to address, project goals and objectives, tasks, a timeline, deliverables, and outputs. NEWMOA’s current (as of July 2021) Workgroups include (some of NEWMOA’s Workgroups are joint groups with the Northeast Recycling Council or NERC):

- Solid Waste & SMM:
 - Construction & Demolition Materials Workgroup
 - Disaster Debris Workgroup
 - Joint Food Recovery Workgroup
 - Joint Household Hazardous Waste Workgroup
 - Joint Recycled Content Standards Workgroup
 - Joint Climate & Materials Workgroup
 - Joint Regional EPR Network
 - Medical Waste Workgroup
 - SMM Measures Workgroup
 - Solid Waste Landfills Workgroup
 - Solid Waste Metrics Workgroup
- Hazardous Waste:
 - Hazardous Waste Permit Writers Workgroup
 - Hazardous Waste Training Workgroup
 - Hazardous Waste Regulation Adoption & Authorization Workgroup

- IC2:
 - IC2 AA Workgroup
 - IC2 Database Workgroup
 - IC2 Equity Workgroup
 - IC2 Governance, Outreach, & Recruitment Workgroup
 - IC2 PFAS Workgroup
 - IC2 Procurement Workgroup
 - IC2 Training Workgroup

- IMERC
 - IMERC Education & Outreach Workgroup
 - IMERC Labeling Workgroup
 - IMERC Notification Workgroup
 - IMERC Phase-out Workgroup

- Waste Site Cleanup (WSC):
 - Brownfields Workgroup
 - Soils Reuse Workgroup (cross program of WSC and solid waste program staff)

- Cross Programs:
 - Continuous Improvement Workgroup
 - EJ Workgroup

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 of the work performed by NEWMOA staff and/or contractors is reviewed by the Committees or Workgroups prior to final review and acceptance/approval by the Board of Directors. Observance of the Quality Management Plan (QMP) and the Generic Quality Assurance Project Plan (QAPP) are an integral part of this process.

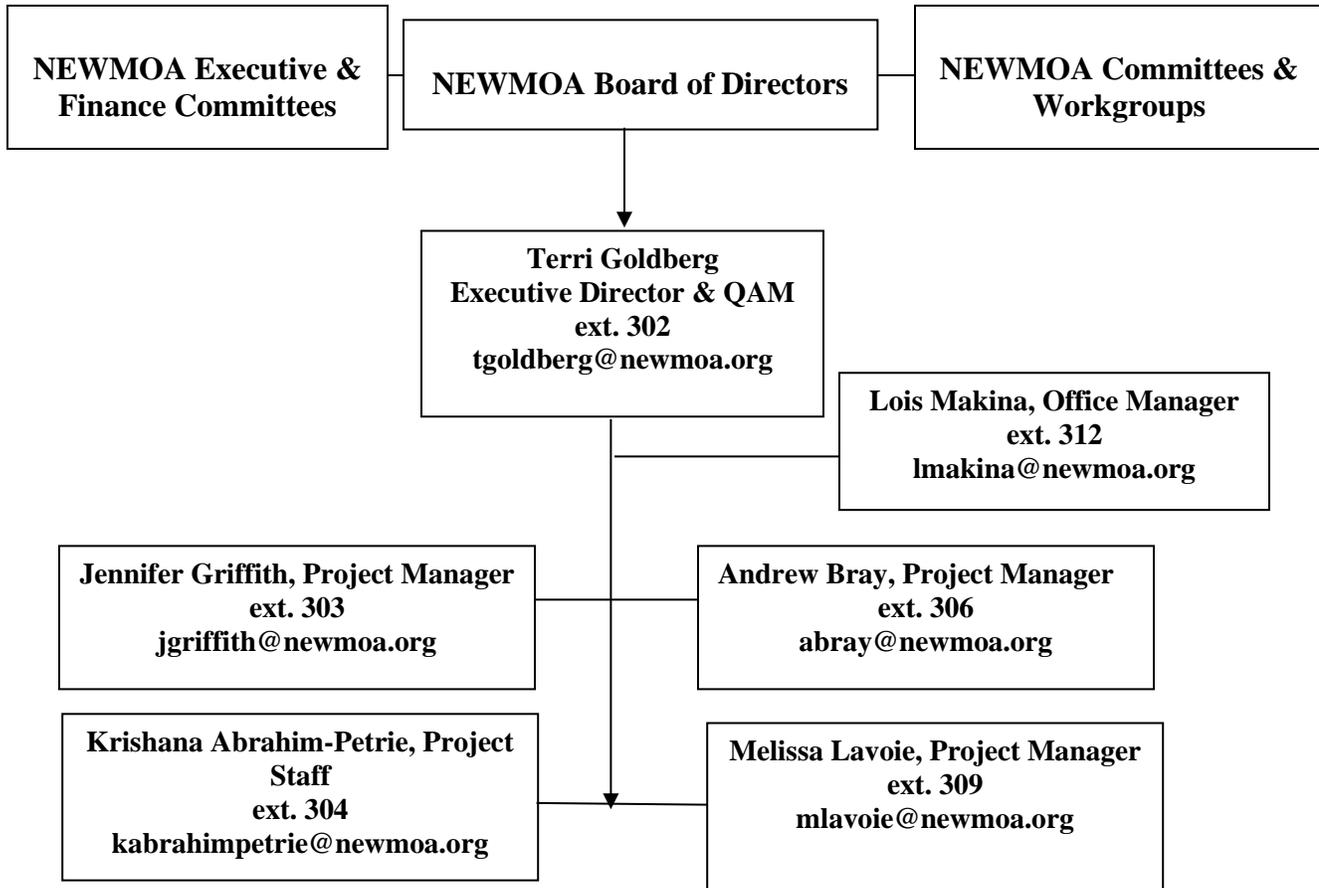
1.6 Quality Assurance Manager & Quality Contact

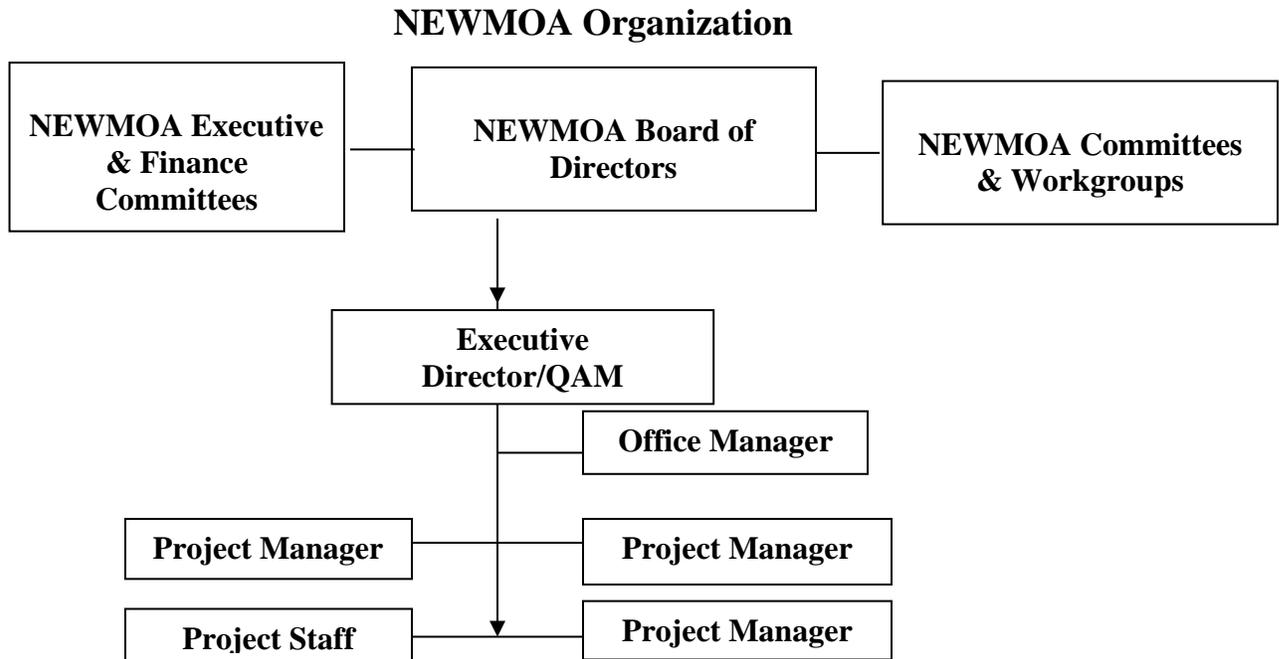
The Executive Director is the Quality Assurance Manager (QAM) and is responsible to the Board of Directors for ensuring that the Association's QA goals are achieved and that the QMP is followed by NEWMOA Project Managers, staff, and contractors. The Executive Director is responsible for the Association's overall performance. In addition, he/she directly supervises the solid waste and sustainable materials management, hazardous waste, pollution prevention and sustainability, IMERC, IC2, and waste site cleanup programs. Project Managers report to the Executive Director. Additional professional staff-members/environmental specialists work on various projects as needed. An Office Manager provides office support services. Finally, interns and personal service contractors are engaged for projects when they are needed.

**NEWMOA Organizational Chart
July 2021**

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Element 2 - Quality System Components

2.1 OMP-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 other's organization is essential to ensuring quality and the successful management of environmental program funds. Therefore, NEWMOA's Board of Directors, Officers, and the Executive Director follow and direct appropriate Project Managers and 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. NEWMOA's project data quality and review SOPs are updated by NEWMOA staff in consultation with its Workgroups on an as needed basis, when the staff and Workgroup members make any changes to the process that was in place at that time.

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. During a two-hour webinar prior to each of its three in person day and a half meetings per year, the NEWMOA management and staff present reports on the status of the organization's projects. The Board provides comments and suggestions during these meetings and makes 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 Board of 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 the quality of the states' data. 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 Board.

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 Project Managers and staff assigned to support the Workgroups follow the Generic QAPP.

NEWMOA staff works with representatives of its members and U.S. EPA 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 below.

2.3 Strategic Plan

NEWMOA's 2018-2022 Strategic Plan

(www.newmoa.org/publications/NEWMOAstrategicPlan.pdf) identifies areas of program emphasis that reflect the needs of state environmental programs. The Plan was developed by the NEWMOA staff and the Board of Directors in consultation with U.S. EPA representatives and is reviewed and updated every five years. For example, the need of states for information concerning the generation and interstate flow of wastes for disposal 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 (www.newmoa.org/solidwaste/flow.cfm). To accomplish the work, NEWMOA dedicates staff to the project; state solid waste program staffs are assigned to work on designing an approach; and the project is processed through the planning components described below.

2.4 Annual Workplans

NEWMOA's fiscal year corresponds with the federal fiscal year and goes from October 1 through September 30. NEWMOA's annual workplan is developed over several months and submitted for Board approval prior to October first each year. Each 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 through NEWMOA on the projects in the workplan is implicit in the Boards' 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 Board 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 projects 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 states 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 2020 report summarizing each member-state's laws, regulations, and policies governing waste tires (www.newmoa.org/publications/Northeast_States-Review_of_Tire_Regulations.pdf). 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 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" (www.newmoa.org/solidwaste/flow.cfm). 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 & Database of Data Submitted by Regulated Entities on Mercury-Added Products

Laws enacted by a subset of IMERC's members require manufacturers and/or certain other organizations to notify them regarding the mercury content of mercury-added products. The state agencies formed NEWMOA's program, called IMERC (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 that displays 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 available upon request.

Repository & Database of Data Submitted by Regulated Entities for the Interstate Chemicals Clearinghouse

Laws enacted by a subset of IC2's members require manufacturers and/or certain other organizations to report on the use of chemical of concern that are used in children's and other types of products. The state agencies formed NEWMOA's program, called IC2 (<https://www.theic2.org/hpcds#gsc.tab=0>) to provide an e-filing system, repository, and an online database for this information (all called the High Priority Chemical Data System or HPCDS). The IC2 is responsible for facilitating state oversight of the submissions by regulated entities, developing and sharing a database that displays the information, and making certain information concerning chemicals of concern in products available to states, businesses, and the public on its website and by other means. Documentation of the HPCDS activities are available upon request.

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 selects and appoints persons for positions that are authorized by the Board of Directors and included in the budget. Rates of pay for employees are approved by the Board of Directors except for interns who are compensated at rates approved by the Executive Director. The Executive Director reports 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 the following staffing levels:

- Executive Director
- Project Managers
- Project Staff, also sometimes referred to as Specialists
- Office Manager
- Interns

Appendix B provides job descriptions that provide an overview of the minimum qualifications and job requirements for each of these levels of NEWMOA staff. The NEWMOA Board can create new positions and job descriptions to address the staffing requirements for new programs.

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 Handbook* that provides detailed information regarding the Association's policies and procedures. Information about accessing the QMP, QAPPs, and SOPs are included in the *Handbook*. 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 review 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 the Board of 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

NEWMOA manages the procurement of goods and services 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; and a copy of the 40 CFR, Part 31 are included in Appendix A of NEWMOA's *Financial Management and Procedures Handbook*.

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 state publications to identify certified minority and women-owned (MBE/WBE) vendors of goods and services. 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.

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)

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

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 by the Office Manager. Orders for documents or reports may be charged to an 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 available in the briefing materials that are produced for each Board of Directors meeting. NEWMOA conducts green meetings, and as a result, does not produce hard copies of the documents. The Board of Directors' meeting materials are shared through data sticks during the meeting and posted in a password protected area of NEWMOA's website. U.S. EPA representatives participate in NEWMOA Board meetings and are provided with the briefing materials, including detailed minutes of Board meetings and Workplans, via the data sticks. All materials produced for Board meetings are stored in a cloud-based storage solution provided by Microsoft, known as SharePoint. SharePoint provides a suite of backup and restore solutions that allow NEWMOA to restore its entire

SharePoint site or just a single file. Details on the available backup and restore services are available on Microsoft's website at: <https://technet.microsoft.com/en-us/library/ee428303.aspx>.

Confidential Board materials are handled differently than other documents. Confidential Board materials can include draft comment letters to EPA, proposals on NEWMOA employee compensation and benefits, state enforcement-related documents, and any others that the Board designates as confidential. These materials are labeled as confidential and handed out as hard copies during meetings. NEWMOA restricts the sharing of electronic versions of confidential materials.

NEWMOA has a "Documents Retention/Destruction Policy" that is available upon request. If a contract or grant requires NEWMOA to retain documents and other records for a specified period of time, NEWMOA ensures that those provisions are implemented.

5.1 Central Files

NEWMOA maintains a main or central filing system in the file cabinets in the office. These files cover:

- NEWMOA founding
- By-Laws
- Grants and contracts
- Employee benefits
- Office insurance
- NEWMOA policies
- Financial Reports

Materials that are three years or older are archived and stored in the copy/storage room. All archived boxes are clearly labeled. The copy/storage room is located in 89 South Street, Suite 600.

5.2 Financial Records

NEWMOA's Office Manager maintains financial files in file cabinets in the office. Data files for NEWMOA's primary financial management software (QuickBooks) are maintained through a secure cloud storage service provider.

5.3 Grants/Contracts

NEWMOA's Office Manager maintains copies of all grants and contracts, and each has a number that NEWMOA staff use to track them. All grant/contract 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 several networked computer workstations as well as a file server. Staff use laptop computers as workstations and for out-of-office use. 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 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 websites. The websites are operated under contract with and are hosted by internet services providers.

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, some of its activities are conducted under federal 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. EPA, USDA, and other funders require an explanation when outputs are late, missing, or deficient. In addition, NEWMOA's Board and U.S. EPA participants at NEWMOA Board meetings are provided with reports identifying all of NEWMOA's accomplishments year-to-date 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/SOPs to ensure conformance to particular expectations is a key determination in the planning of a project.

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 Board 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 approved workplan. Corrective measures are detailed in the Executive Director's 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 the NEWMOA Board 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 Project Managers and the Board. 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.

NEWMOA formally reviews and updates the entire QMP in the year prior to the end of the five-year term of the Plan. The next full review and update will start in 2025. If a question or issue arises in the interim because of a new project or initiative, NEWMOA's Board will revisit the QMP and determine whether it needs to be revised.

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 2021 Workplans

As Approved by the NEWMOA Board of Directors September 17-18, 2020.

Hazardous Waste (HW) Program & Cross Program Workplans

October 1, 2020– September 30, 2021

Hazardous Waste Program (funded by RCRA Grant from EPA Region 1)

Provide a variety of training and support services to help state hazardous waste programs develop and maintain high quality services and professional staff so that they can achieve their public health and environmental objectives.

Goals

- Improve the capacity of state HW program staff to implement RCRA regulations
- Articulate state program views on EPA rulemakings and other policy and program developments
- Coordinate with EPA Regions 1 and 2

Strategies & Implementation Activities

- **Provide a forum for discussion of emerging hazardous waste issues and federal rulemakings and policy developments**
 - Facilitate three to four Hazardous Waste (HW) Steering Committee conference calls
 - Discuss priority topics and share information
 - Form temporary subgroups to develop and submit comments on proposed federal rules, when appropriate
 - Provide input to the NEWMOA Hazardous Waste Program Chair prior to the NEWMOA Board meetings
 - Coordinate and oversee NEWMOA's HW annual workplan and funding
 - Establish NEWMOA HW working groups to carry out projects
 - Prepare and distribute notes on the results of the Committee calls
 - Maintain hazardous waste section of NEWMOA's website
- **Develop and hold information-sharing and training events to address state RCRA programs' policy and technical needs**
 - Facilitate three to four Hazardous Waste Training Workgroup conference calls to plan calls/webinars and workshops
 - Prepare and distribute notes on the results of the Workgroup calls
 - If necessary, conduct a survey to identify 2021 training priorities
 - Hold 10-11 information-sharing webinars or conference calls; topics based on results of Training Workgroup discussions and a survey, if necessary; prepare, distribute, and post notes on the results of the calls or slides and recordings of the webinars
 - Organize RCRA inspector training in-person or virtual workshops for EPA Regions 1 and 2 states/territories; post presentations/notes from the workshops

- **Facilitate EPA and state understanding of each other’s perspectives, needs, and issues and work toward improving the relationships among the programs involved in hazardous waste management regulation and policy**
 - Invite RCRA Program managers from EPA Regions 1 and 2 to NEWMOA Board meetings for updates and information sharing
 - Participate in semi-annual EPA Region 1 meetings with state RCRA Program Managers
 - Participate in ASTSWMO’s annual meeting/s
- **Offer inspector and other training for staff that are new to the state hazardous waste programs**
 - Coordinate with EPA and others to share updates, opportunities, and information on training for new RCRA inspectors
 - Support online posting of RCRA training resources on NEWMOA’s hazardous waste members’ webpage
- **Facilitate NEWMOA’s RCRA Permit Writers Workgroup**
 - Organize and facilitate two conference calls of NEWMOA’s Permit Writers Workgroup
 - Prepare and distribute notes on the results of the Workgroup calls

Continuous Improvement Practices to Promote Efficiency & Effectiveness of State Programs (Cross Program Initiative) (funded by state dues)

Provide opportunities for state and EPA programs to share the results and lessons learned from their Lean events, tools, and other Lean information resources.

Goal

- Improve the capacity of state program staff to develop and implement Lean and other process improvement initiatives and coordinate with EPA

Strategies & Implementation Activities

- **Provide a forum for sharing information on and discussions of continuous improvement activities**
 - Organize and facilitate two to three conference calls of NEWMOA’s Continuous Improvement Workgroup
 - Prepare and distribute notes on the results of the Workgroup calls
 - Organize one or two webinars to share information on state and EPA process improvement activities, if requested and as resources allow
 - Support information sharing among state programs on continuous improvement activities and results through an EPA Region 1 SharePoint site
- **Provide general support for continuous improvement activities**
 - Maintain and update NEWMOA’s Continuous Improvement Webpage (www.newmoa.org/about/lean/index.cfm)

Environmental Justice (EJ) Workgroup (Cross Program Initiative) (funded by state dues)

Provide opportunities for state programs to share information and resources on environmental justice policies and approaches and lessons learned.

Goal

- Improve the capacity of state program staff to effectively integrate environmental justice considerations in the implementation of their waste, cleanup, and prevention programs and coordinate with EPA

Strategies & Implementation Activities

- **Provide a forum for sharing information on and discussions on EJ in waste, cleanup, and prevention programs**
 - Organize and facilitate ~three virtual meetings of NEWMOA's EJ Workgroup
 - Prepare and distribute notes on the results of the Workgroup meetings
 - Organize one or two webinars to share information on state and EJ activities, if requested and as resources allow

Sustainable Materials Management & Solid Waste Program Workplan

October 1, 2020 – September 30, 2021

Solid Waste & Sustainable Materials Management (SMM) Program (funded by RCRA grant and state dues)

Helps states develop and promote sustainable materials management strategies, including reduction, reuse, recycling, organics diversion, and proper waste management for a wide variety of solid wastes through training, information sharing, program coordination, and data sharing and analysis.

Goals

- Improve the management of solid wastes in the region, including improving solid waste reduction, recycling, reuse, and organics diversion
- Increase interstate coordination to understand and address priority solid waste and sustainable materials management issues
- Articulate state program views on EPA rulemakings and other policy developments

Strategies & Implementation Activities

- **Provide an Information-sharing Forum to Address State Solid Waste (SW) and Sustainable Materials Management (SMM) Programmatic and Technical Needs**
 - Hold three to four conference calls of the Solid Waste and SMM Steering Committee to:
 - Discuss priority topics and share information
 - Provide input to the NEWMOA Solid Waste and SMM Program Chair prior to the NEWMOA Board meetings
 - Prepare and oversee NEWMOA's SW and SMM workplan and funding
 - Track EPA's SMM activities and share with appropriate NEWMOA Workgroups
 - Prepare and submit comments to EPA on priority issues, if applicable
 - Establish SW and SMM working groups to carry out projects
 - Prepare and distribute notes on the results of the calls
 - Maintain solid waste section of NEWMOA's website

- Coordinate with NERC on implementation of the joint FY 2020-2022 Strategic Action Plan; FY 2021 workplan
 - Prepare and disseminate annual report on joint activities with NERC
- **Identify Opportunities for Reducing Wasted Food and Food Waste Diversion from Disposal**
- Implement the food recovery section of the NEWMOA-NERC Workplan
 - Organize four conference calls of the Food Recovery Workgroup in collaboration with NERC to:
 - Share information, strategies, and tools
 - Discuss opportunities for regional coordination on food waste programs
 - Identify areas for coordination and collaboration; discuss regional goal/s
 - Prepare and distribute notes on the results of the Workgroup calls
 - Plan and promote 2-3 food recovery webinars in collaboration with NERC; post the recordings and slides
- **Support State Extended Producer Responsibility (EPR) Programs**
- Implement the EPR section of the NEWMOA-NERC Workplan
 - Organize three to four conference calls of the Northeast EPR Network in collaboration with NERC to:
 - Share information, strategies, and tools
 - Assist and communicate with the Northeast Committee on the Environment (NECOE)
 - Discuss opportunities for regional coordination on EPR programs
 - Prepare and distribute notes on the results of the calls
- **Support the Climate and Materials Working Group**
- Implement the Climate and Materials Management section of the NEWMOA-NERC Workplan
 - Prepare and distribute notes on the results of the calls
 - Hold two to three four conference calls of the workgroup in collaboration with NERC to identify next steps and actions for states and NEWMOA
 - Prepare and distribute notes on the results of the calls
 - Participate in West Coast Climate and Materials Management Forum calls and webinars
 - Assist the NECOE on their climate action activities related to materials and waste
- **Recyclables Collection Strategies**
- Implement the recyclable section of the NEWMOA-NERC Workplan
 - Assist NYSDEC with convening a regional Bottle Bill Workgroup
- **Increasing the Use of Recycled Content in Products**
- Implement the recycled content section of the NEWMOA-NERC Workplan
 - Hold a virtual workshop on use of recycled content, including plastic, glass, asphalt shingles, and tires in roadway projects
 - Hold six virtual meetings of the Recycled Content Legislation Workgroup in collaboration with NERC
 - Prepare and distribute notes on the results of the Workgroup calls

- Participate in the monthly Recycling Markets Committee conference calls that are led by NERC
- **Improve Tire Recycling in the Region**
 - Implement the tires section of the NEWMOA-NERC Workplan
 - Finalize and publish a summary of state tire management fees and use of those funds
- **Support State Construction & Demolition Materials Programs**
 - Hold two to three C & D Materials Workgroup calls
 - Prepare and distribute notes on the results of the Workgroup calls
 - Attend annual Environmental Business Council (EBC) C&D Materials Summit
- **Support State Medical Waste Management Programs**
 - Hold two to three Medical Waste Workgroup calls
 - Prepare and distribute notes on the results of the Workgroup calls
- **Support State Programs and EPA with Planning for Disaster Debris Management**
 - Convene two Disaster Debris Workgroup conference calls to discuss the status of state and local disaster debris management planning and identify next steps
 - Prepare and distribute notes on the results of the Workgroup calls
 - Organize one or two disaster debris topical webinars, if there is sufficient interest
- **Help State Programs Share and Discuss Sustainable Materials Management Measures and their Uses**
 - Hold three to four conference calls of the SMM Measures Workgroup to identify key metrics for measuring progress toward SMM and identify opportunities for regional coordination
 - Prepare and distribute notes on the results of the Workgroup calls
 - Prepare a memo with recommendations for next steps
- **Support State Closed Landfill Programs**
 - Hold two Closed Landfill Workgroup conference calls to share updates, tools, and resources and identify challenges
 - Prepare and distribute notes on the results of the Workgroup calls
- **Support State Understanding of MSW Disposal Interstate Flow and Capacity**
 - Finalize regional disposal capacity report and publish
 - Finalize and publish draft MSW disposal report for 2016 and 2018 data
 - Hold 2-3 calls of the MSW Metrics Workgroup to discuss comments on the draft reports
- **Facilitate Coordination Between EPA and State Programs in Understanding Perspectives, Needs, and Issues in Solid Waste Management**
 - Share EPA announcements, event notices, updates, and resources via email
 - Organize and hold two to three virtual meetings of EPA Region 2, NJ DEP, NYS DEC, PR, VI, and NEWMOA SMM staff to share information, identify priorities, and plan an annual meeting
 - Prepare and distribute notes on the results of the calls

- Hold annual meeting of EPA Region 2, NJ DEP, NYS DEC, and NEWMOA SMM staff
- Prepare and distribute notes on the results of the meeting

➤ **Support State Household Hazardous Waste (HHW) Programs**

- Explore formation of a regional workgroup to share information and tools to support state HHW programs
- Decide on next steps and convening of calls

Special Solid Waste Projects (Funded by grants/contracts)

➤ **Implement Wasted Food Reduction Projects in New York State (funded through contracts with Onondaga County Resource Recovery Association or OCCRA and Erie County based on grants from NYSDEC)**

- Assist OCCRA with implementing a public outreach and education campaign in Onondaga County targeting low income and non-English speaking communities regarding opportunities for food scrap reduction and diversion to composting
- Assist Erie County with implementing a technical assistance project targeting restaurants and other commercial facilities to reduce wasted food and divert what can't be reduced
- Documents the results of the projects and share them regionally via webinar and a NY conference

➤ **Implement Project to Provide Training and Technical Assistance to Support State Efforts to Establish Prescription Drug Disposal and Battery Collection in Targeted Rural Areas of NH and VT (funded by USDA grant)**

- Prepare fact sheets and guidance on proper collection of unused pharmaceuticals in NH and VT targeting long term care facilities and their residents
- Establish a prescription drug disposal program and a battery collection program at a long-term care facility in NH and in VT
- Hold workshops about the programs at the long-term care facility in NH and in VT
- Establish a prescription drug disposal program in a community (i.e., police station or pharmacy) in NH and in VT
- Hold workshops for the community in NH and in VT
- Partner with a home health and/or hospice care provider in NH and in VT to establish prescription drug disposal programs for recipients of their care
- Hold workshops for the care providers in the partner program in NH and in VT
- Develop next steps recommendations and an action plan for NH and VT
- Share the project materials and results with a broad audience through a national webinar

Waste Site Cleanup (WSC), Brownfields, & Soil Reuse Workplan

October 1, 2020 – September 30, 2021

Waste Site Cleanup & Brownfields Program (funded by New England States & event fees)

Provide training and program support services to help members' waste site cleanup programs successfully advance the cleanup and maintenance of contaminated property, and thereby improve economic development, public health, and the environment.

Goals

- Improve the efficiency and effectiveness of characterization and remediation at contaminated sites in the Northeast
- Promote interstate coordination to improve state waste site cleanup and Brownfields programs
- Improve the technical capacity of state waste site cleanup program staff and the consulting community to address emerging issues

Strategies & Implementation Activities

- **Help state programs develop strategies to improve the effectiveness of site cleanup and Brownfields programs**
 - Facilitate four conference calls of the Waste Site Cleanup (WSC) Steering Committee
 - Discuss priority topics and share information
 - Develop and submit comments on federal rulemakings, if appropriate
 - Provide input to the NEWMOA WSC Program Chair prior to the NEWMOA Board meetings
 - Coordinate and oversee NEWMOA's annual workplan and funding
 - Develop and oversee plans for conferences, workshops, and webinars
 - Establish working groups to carry out projects
 - Prepare and distribute notes on the results of the calls
 - Maintain and update WSC section of NEWMOA's website
- **Help coordinate the state and federal Brownfields programs and share information on program challenges and successes**
 - Hold an annual States/EPA Brownfields Programs virtual meeting on October 7, 2020
 - Prepare and distribute notes on the results of the meeting
 - Organize a two-day Brownfields Summit for October 6 and 7, 2021 in Devens, MA
 - Hold monthly planning calls of the NEWMOA Brownfields Workgroup, EPA Region 1, NJIT, and Summit sponsors beginning in January 2021
 - Recruit additional financial sponsors and exhibitors for event
 - Review the Summit agenda and evaluate if a new Call for Presentation Proposals is needed, and manage the process, if applicable
 - Develop the final Summit agenda
 - Obtain continuing education credits for MA LSPs
 - Manage registration and payments
 - Manage all event planning logistics
- **Develop training events and opportunities designed to improve the capacity of state officials, consultants, and others to effectively implement and oversee the characterization and remediation of contaminated sites**
 - Hold public training webinars
 - PCBs in Building Products: Implications for Brownfields on October 14, 2020
 - Understanding TSCA for Sites with PCBs on November 3, 2020
 - At least 3 additional webinars on topics selected by the Steering Committee
 - Evaluate the feasibility of holding in-person workshops in 2021, and organize and hold, as appropriate

- Partner with other organizations, as appropriate to enable state staff to attend workshops and conferences, including the October 2020 virtual AEHS 36th Annual International Conference on Soils, Sediments, Water, and Energy
- **Help state programs learn about emerging cleanup issues and identify strategies to address them**
 - Hold monthly states/EPA conference calls to share information on poly- and perfluoroalkyl substances (PFAS) topics and lessons learned
 - Hold two or more conference calls of the “Soil Leaching” ad hoc group
 - Evaluate the agenda developed for the March 31/April 1, 2020 PFAS Science Conference and develop a series of webinars open to the public; add additional suggested topics as feasible
 - NH DES work on understanding PFAS air deposition at the Saint Gobain site
 - University of New Hampshire study on fate and transport of PFAS at wastewater treatment plants
 - Michigan MPART developments
 - North Carolina experience with GenX
 - EPA Office of Research and Development PFAS Research and status
 - Organize a two-day Science of PFAS Conference at the Sheraton in Framingham, MA in late calendar year 2021
 - Hold planning calls beginning about eight months prior to the event date
 - Recruit additional financial sponsors and exhibitors for event
 - Review the Conference agenda and evaluate if a new Call for Presentation Proposals is needed, and manage the process, if applicable
 - Develop the final Conference agenda
 - Obtain continuing education credits for MA LSPs
 - Manage registration and payments
 - Manage all event planning logistics
 - Organize a one-day meeting of government officials the day immediately following the Science of PFAS Conference
 - Hold planning calls beginning about eight months prior to the meeting
 - Review the meeting agenda and evaluate if revisions or updates are needed
 - Develop the final meeting agenda
 - Continue participation in AEHS Advisory Board, including moderating a PFAS session at the October 2020 conference and organizing PFAS sessions for the October 2021 conference

Soil Reuse - Cross Program with the Solid Waste Program (Funded by New England States)

Goals

- Facilitate a regional dialogue to assist states as each develops a framework that:
 - Protects human health and the environment
 - Provides clarity for utility; construction; other private developers; and municipal, county, and state government agencies
 - Develops requirements that are not onerous for the state or stakeholders to implement
 - Preserves landfill capacity by allowing non-landfill uses, as appropriate

- Promotes cost effective alternatives
- Advances consistency within the states' programs
- Advances consistency among states in the region, to the extent feasible

Strategies & Implementation Activities

- **Maintain and improve the online *Soil Reuse: State Information Resource* that contains information provided by states, including rules, guidance documents, and fact sheets related to managing mildly contaminated soils**
 - Solicit updates and post information supplied by state programs to keep the information and links up-to-date
- **Provide a forum for state programs to discuss approaches and policies they are considering for soil reuse**
 - Hold two Soil Reuse Workgroup conference calls to share tools, resources, and information on program and policy changes under consideration or in development
 - Prepare and distribute notes on the results of the Workgroup calls

Pollution Prevention & Sustainability Workplan

October 1, 2020 – September 30, 2021

Pollution Prevention (P2) & Sustainability Program (Funded by contributions from CT DEEP, NH DES, and RI DEM)

Help advance pollution prevention, sustainability, and assistance through regional strategies, outreach, information sharing, training, data sharing and analysis, and a wide variety of targeted sector and topical projects to promote economic prosperity, public health, and environmental improvement.

Goals

- Exchange information among programs regionally and explore opportunities for leveraging resources and solving problems collaboratively
- Identify priority industrial, business, and institutional sectors and create forums for information sharing on them
- Develop coordinated strategies to address sectors, including the development and deployment of tools to promote and inform the implementation of P2 and sustainable practices and technologies
- Facilitate communication among state assistance and P2 programs and the U.S. EPA to foster collaboration and to accelerate the adoption of more sustainable practices
- Improve the ability of state programs to measure and communicate their effectiveness and the environmental benefits achieved through their efforts and those of their clients through the development of measurement methodologies and information sharing tools

Strategies & Implementation Activities

- **Identify priority industrial, business, and institutional sectors and create forums for information sharing on them**
 - Hold 2 conference calls of the P2 and Sustainability Steering Committee; document results

- Discuss priority topics and share information; possible topics:
 - Breweries
 - PFAS in biosolids, industrial wastewater discharges, car washes, etc.
 - Chemical preparedness and climate resiliency
 - Provide input to the NEWMOA P2 and Sustainability Program Chair prior to the NEWMOA Board meetings
 - Coordinate and oversee NEWMOA's P2 and Sustainability workplan and funding
 - Maintain and update the P2 and Sustainability section of NEWMOA website
- **Multistate support for outreach and assistance to the food and beverage sector (Funded by contracts with CT DEEP, NH DES, and RI DEM)**
- Convene states through quarterly calls to share information on outreach and assistance strategies with the sector
 - Advise states on measurement strategies with the sector
 - Support RI DEM's efforts to advance sustainability in the brewery sector by helping to develop and deliver training to industry and share out success stories
 - Develop a checklist of best management practices in the sector for CT DEEP
- **Develop coordinated strategies to address sectors, including the development and deployment of tools to promote and inform the implementation of P2 and sustainable practices and technologies (Funded by RI DEM's P2 grant carry-over)**
- Support RI DEM's efforts to advance P2 in the janitorial service sector by helping to develop and deliver training to industry
 - Assist in development of an e-learning module on the use safer cleaning and sanitizing for school facilities staff
 - Assist in development of an e-learning module on the procurement of safer cleaners for use in schools
- **Facilitate communication among state assistance and P2 programs and the U.S. EPA to foster collaboration and to accelerate the adoption of more sustainable practices**
- Prepare written updates about the activities of the P2 and Sustainability Program for the quarterly NEWMOA newsletter, when appropriate
- **Support EPA's P2 Hub (Funded by a sub-contract with ERG based on EPA HQs contract)**
- Upon request by ERG, provide support to EPA HQs on the development of a national P2 Hub

IMERC Workplan

October 1, 2020 – September 30, 2021

Interstate Mercury Education & Reduction Clearinghouse (IMERC) - (funded by annual IMERC membership, contract with CT DEEP for e-filing system upgrades, and supporting membership dues)

Help states implement laws and programs aimed at getting mercury out of products, the waste stream, and the environment

Goals

- Provide ongoing technical and programmatic assistance to states that have enacted mercury education and reduction legislation
- Act as a single point of contact for industry and the public for information on mercury-added products and member states' mercury education and reduction programs

Strategies & Implementation Activities

- **Manage the Clearinghouse and implement the IMERC Strategic Plan to support state laws and programs that address key sources of mercury pollution and thereby protect and enhance public and environmental health**
 - Coordinate three to four conference calls of the IMERC Steering Committee, including developing call notes to document decisions to:
 - Discuss priority topics and share information
 - Coordinate and oversee IMERC's annual workplan and funding
 - Report on the status of IMERC state dues and other funding sources
 - Coordinate state enforcement efforts related to mercury product requirements
 - Facilitate IMERC Workgroups that carry out projects
 - Continue to recruit companies, trade associations, and NGOs as IMERC Supporting Members and foster these relationships through conference calls and other outreach/educational activities
 - Develop proposals for projects that these groups may want to fund or partner with IMERC on
- **Help state programs implement mercury-added product notification, labeling, phase-out, and ban programs**
 - Implement mercury-added product notification requirements by coordinating activities of the Notification Workgroup
 - Oversee the work of the IT contractor to finalize the upgrades to the e-filing system; launch system and announce filing deadline for reporting on CY 2018 data
 - Oversee the work of the IT contractor to upgrade the Mercury-Added Products Public Database; launch the new system and promote it; update the notification guidance on the IMERC webpages
 - Implement mercury-added product notification requirements by coordinating activities of the Notification Workgroup
 - Conduct administrative reviews of submitted IMERC Mercury-added Product Notification Forms and assign further technical reviews to appropriate states
 - Convene approximately eight to ten conference calls of the Notification Workgroup to review incoming submissions
 - Develop notes from each Workgroup call to document discussion and decisions; request follow-up information from companies, as appropriate
 - Send approval and comment letters to reporting entities through the e-filing system
 - Address compliance assistance requests from regulated facilities on the notification requirements
 - Maintain an active listing of mercury-added product manufacturers and their notification submission status
 - Send inquiry letters to companies suspected of being out-of-compliance with Notification requirements; assign state follow-up as needed

- Implement mercury-added product labeling requirements by coordinating activities of the Labeling Workgroup
 - Maintain an active listing of approved alternative labeling plans, including their expiration dates (note – most plans expired in 2020) through the e-filing system
 - Send compliance letters to companies with expired alternative labeling plans
 - Conduct completeness reviews and share alternative labeling plan applications with the IMERC Labeling Workgroup
 - Hold three to four conference calls to review applications
 - Develop notes from each Workgroup call to document discussion and decisions; request additional information from companies, as appropriate
 - Send approval and/or comment letters to companies regarding their plans
 - Address compliance assistance requests from facilities regulated by state product labeling requirements
 - Update the labeling guidance on the IMERC webpages to implement the changes determined in FY20 and to reflect changes in the e-filing system
 - Update the Alternative Labeling Plan Application Forms and Instructions to implement the changes determined in FY20 and to reflect the changes in the e-filing system
 - Maintain table of state labeling law requirement and update, as applicable
 - Research online retailers regarding compliance with IMERC and FTC labeling requirements; document results to discuss with the Workgroup; and coordinate communications regarding compliance as needed
- Facilitate compliance with mercury-added products bans and phase-outs by coordinating activities of the Phase-Out Workgroup
 - Maintain an active listing of all exemption applications, including whether they were denied or approved and their expirations dates through the e-filing system
 - Send compliance letters to companies with expired exemption applications
 - Conduct completeness reviews and share Mercury-added Product Phase-out Exemption Applications to the appropriate state programs
 - Coordinate with the Workgroup Chair to hold approximately two to three conference calls of the IMERC Phase-out Workgroup to coordinate state efforts
 - Develop call notes to document discussion and decisions; and perform follow-up activities, as requested
 - Address compliance assistance requests from companies that are regulated by state mercury product bans, phase-outs, and collection plan requirements
 - Update the product ban/phase out guidance on the IMERC webpages based on changes to the e-filing system
 - Update the Phase-out Exemption Application Form and Instructions to reflect the changes to the e-filing system
 - Conduct online research on possible manufacturers and distributors of mercury-added products, particularly switch and relay products and pressure transducers, to ensure that they are in compliance with state product bans and sales restrictions
 - Provide outreach and/or support state enforcement efforts, as needed
- Coordinate education and outreach activities to promote IMERC and state mercury reduction programs by coordinating the Education and Outreach Workgroup
 - Organize materials for and hold at least one webinar to train users on the upgraded e-filing system

- Coordinate with the Workgroup Chair to hold approximately two conference calls of the IMERC Education and Outreach Workgroup to coordinate state efforts; develop call notes to document discussion and decisions
 - Develop and publish two or three issues of *IMERC Alert*
 - Maintain overall IMERC webpages
- **Help state programs continue to manage effective mercury reduction programs by sharing information on program activities, successes, and challenges**
- Manage Mercury Policy, Legislation, and Regulations listserv
 - Maintain and update mercury and IMERC sections of the NEWMOA website

IC2 Workplan

October 1, 2020 – September 30, 2021

Interstate Chemicals Clearinghouse (IC2) (funded by IC2 membership dues, a contract with the New York State Department of Environmental Conservation, contracts with Washington Ecology and Oregon Health Authority for operations and maintenance of the HPCDS, and a contract with the University of Massachusetts Lowell Center for Sustainable Production)

Mission: Promote a clean environment, healthy communities, and a vital economy through the development and use of safer chemicals and products

Goals

- Avoid duplication and enhance efficiency and effectiveness of state agency initiatives on chemicals through collaboration and coordination
- Build governmental capacity to identify and promote safer chemicals and products
- Ensure that agencies, businesses, and the public have ready access to high-quality and authoritative chemicals data, information, and assessment methods

Strategies & Implementation Activities

- **Manage the Clearinghouse**
 - Facilitate four IC2 Council calls and one IC2 Board call and participate in biweekly Executive Committee (EC) calls to engage the IC2 Board, Council, and Workgroups in strategic planning; prepare meeting summaries
 - Respond to member requests
 - Publish and disseminate two to three IC2 *e-Bulletins*
 - Maintain the IC2 website and evaluate, prioritize, and implement requested or needed enhancements
 - Prepare and subsequently track progress against the IC2 workplan and budget and NYSDEC statement of work and budget
- **Support the IC2 Alternatives Assessment (AA) Workgroup**
 - Facilitate four AA Workgroup conference calls to discuss efforts and coordinate Workgroup activities
 - Prepare and distribute notes on the results of the Workgroup calls

- Populate the Chemical Hazard Assessment Database (CHAD) with additional GreenScreen and QCAT assessments, as available
 - Assist with developing resources on AA for disinfectants and cleaning products
 - Maintain the AA Library section of the IC2 website and post new AAs, as available
 - Participate in BizNGO and A4 conference calls focused on AA methods and results
- **Support the IC2 Database Workgroup**
- Facilitate four Database Workgroup conference calls to discuss efforts and coordinate Workgroup activities; prepare meeting summaries
 - Evaluate the future of IC2's Chemical Hazard Assessment Database, the Policy Database, and the Chemicals of High Concern Database and set priorities for upgrades and improvements
 - Manage and support development of the IC2 High Priority Chemicals Data System (HPCDS)
 - Update the IC2 Chemicals of Concern Database, as appropriate, to reflect changes to existing state lists or add new state lists
- **Support the IC2 Governance, Outreach, and Recruitment Workgroup**
- Facilitate four Workgroup conference calls to provide a forum for communications on GOR topics
 - Prepare and distribute notes on the results of the Workgroup calls
 - Set recruitment goals and identify and prioritize organizations for recruitment
 - Help the IC2 GOR refine and update value statements about the IC2 and recruitment materials
 - Help the IC2 GOR develop/refine a strategy for retaining current members and implement
 - Address governance issues as they arise
- **Support the IC2 PFAS Workgroup**
- Facilitate monthly IC2 PFAS Workgroup virtual meetings
 - Share follow-up information & organize additional events, as appropriate
 - Coordinate with other IC2 and NEWMOA workgroups, as appropriate
- **Support the IC2 Procurement Workgroup**
- Facilitate two or more IC2 Procurement Workgroup conference calls
 - Prepare and distribute notes on the results of the Workgroup calls
- **Support the IC2 Training Workgroup**
- Facilitate four Training Workgroup conference calls to provide a forum for communication on training issues, to make decisions about the activities, and to monitor participation and feedback
 - Prepare and distribute notes on the results of the Workgroup calls
 - Organize and hold four to six training webinars to educate the IC2 membership about the current state of chemical hazard assessment and AA best practices and related state and NGO efforts

- Explore opportunities and, if appropriate, work with supporting members, including GC3 and Clean Production Action to organize one or two co-sponsored webinars for larger audiences, including industry, as part of the list of webinars in the prior bullet
 - Coordinate and hold one to two IC2 roundtable virtual meetings where members have an opportunity to share updates on their priorities, programs, and legislation
 - Evaluate training event content and participation levels
- **Support NYSDEC's Product Ingredient Information Disclosure Programs**
- Participate in conference calls with NYSDEC staff to assist them with development and implementation of their Cleansing Product Information Disclosure Program, as requested
 - Upon request by NYSDEC, support stakeholder engagement related to NYSDEC's proposed and final Household Cleansing Product Information Disclosure Form and instructions
 - Upon request, help NYSDEC refine its Form and instructions to ensure that cleansing product ingredient data posted on manufacturers' websites can be easily harvested by computer systems, in addition to being human-readable
 - Upon request by NYSDEC, refine NEWMOA's description and level-of-effort/cost estimate for creation of an online system to collect, store, and display to the public the information from the certification forms submitted by manufacturers
 - Gather and document requirements for an online system to collect, store, and display to the public the information from the Household Cleansing Product Information Disclosure Forms submitted by manufacturers
 - Create a functional specifications document describing how the online system will obtain, organize, format, and present cleansing product manufacturer disclosure links and compliance information to the public
 - Work with an IT contractor to develop, test, and deploy an online system to collect, store, and display to the public the information from the certification forms submitted by manufacturers
 - Assist with implementation of & rulemaking for NY's Toxic Chemicals in Children's Products law
 - If requested by NYSDEC, support implementation of new laws associated with PFAS in firefighting foams & 1,4-dioxane in cleaning products, cosmetics, & personal care products
- **Support Development of Chemical Ingredient Transparency Principles**
- Finalize a public set of transparency principles – final version near completion
 - Seek signatories on the principles (ongoing)
 - Publicize
- **Support AA for PFAS in Firefighting Foams Project**
- Planning for project kick-off in the fall of 2020
 - Coordinate subgroup of the AA and PFAS Workgroups to participate in the project

Appendix B

NEWMOA Job Descriptions

July 2021

Title: Executive Director

Location: NEWMOA, 89 South Street, Suite 600, Boston, MA 02111

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, 89 South Street, Suite 600, Boston, MA 02111

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: Project Staff or Environmental Specialist

Location: NEWMOA, 89 South Street, Suite 600, Boston, MA 02111

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 two years of full time or equivalent part time professional experience in the field of environmental science, policy, or planning.

Education

An undergraduate degree from a recognized school with a major in biology, chemistry, physics, earth science, environmental science or health, environmental planning or policy, or engineering is required. 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 toxic chemicals, and pollution prevention policies and programs
- Good communications skills, both verbal and written
- Excellent organizational skills; a keen attention to detail
- Good teamwork and problem-solving skills
- Ability to work effectively with scientists, engineers, and policy makers and to establish professional credibility
- Ability to work independently
- Facility with spreadsheets

General Duties & Responsibilities (Specific duties and responsibilities to be assigned depending on the NEWMOA project)

- Assists with implementing projects and with project planning, execution, and reporting
- Assists with coordinating and documenting NEWMOA Workgroup/s
- Gathers and presents information and helps to draft technical or policy documents, fact sheets, handouts, presentations, reports, and memos
- Helps to organize Workgroup meetings, webinars, workshops, and conferences
- Analyzes and presents data
- Assists with updating and maintaining NEWMOA's websites and social networking sites

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

Supervisory Controls

Project Staff are under the supervision of the NEWMOA Executive Director and Project Managers, depending on the project. Job performance is evaluated by the Project Manager (s) and Executive Director.

Title: Office Manager

Location: NEWMOA, 89 South Street, Suite 600, Boston, MA 02111

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 Office 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 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, update mailing lists, and email lists
- Ensures the smooth flow of work through the office
- Assists the NEWMOA staff and management with special projects

Supervisory Controls

The Office Manager is under the supervision of the NEWMOA Executive Director. Job performance is evaluated by the Executive Director.

Appendix C

Northeast Waste Management Officials' Association (NEWMOA)

Generic Quality Assurance Project Plan

2021 – 2025

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



9/15/2021

Terri Goldberg, Executive Director
Quality Assurance Officer

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

NEWMOA’s Board of Directors is responsible for initiating and approving NEWMOA projects. Members as of July 2021 are listed in the table below and are shown in the organization chart on page 47. The Board 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 Board 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.

Project Implementation Personnel - 2021		
Individual	Role in Project	Organizational Affiliation
Terri Goldberg	Executive Director/Project Manager & Quality Assurance Manager (QAM)	NEWMOA
Nicole Lugli	State Project Lead	CT DEEP
Susanne Miller	State Project Lead	ME DEP
Greg Cooper	State Project Lead	Mass DEP
Michael Wimsatt	State Project Lead	NH DES
Mike Hastry	State Project Lead	NJ DEP

John Vana	State Project Lead	NYSDEC
Ron Gagnon	State Project Lead	RI DEM
TBD	State Project Lead	VT DEC

The NEWMOA Executive Director/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 the NEWMOA Board 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 Board 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 the Board. This support and participation may include:

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

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
- Facilitated comparisons of the effectiveness and efficiency of different state strategies
- Improved ability to detect and correct data inconsistencies and improve data gathering procedures

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 members is generally familiar with the quality issues related to the secondary data that are used in a given project. The Board of 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.

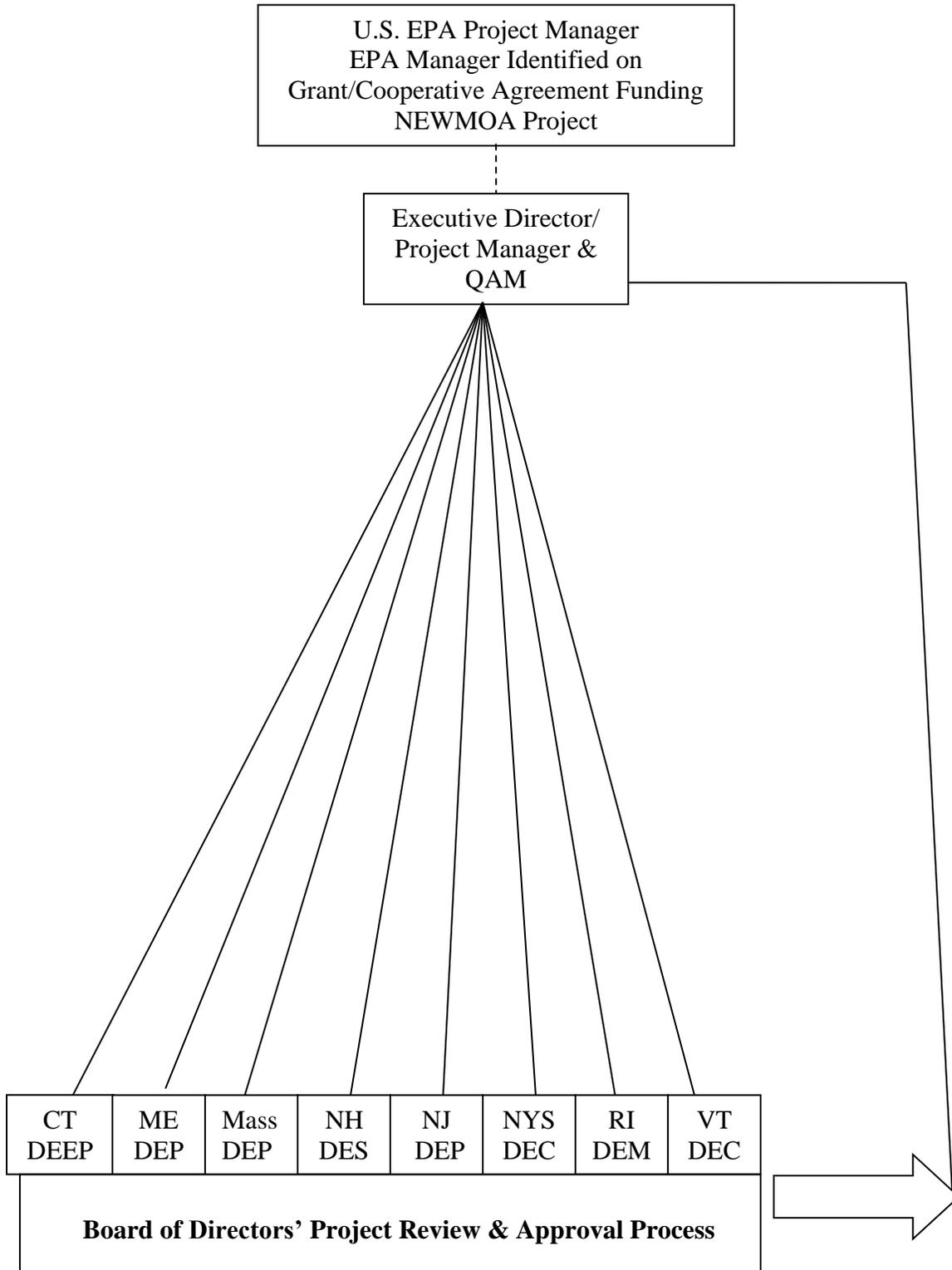
The quality issues anticipated at each step of the project are identified and discussed by state and NEWMOA staff to identify appropriate data quality assurance and analysis procedures/criteria at key stages of the project. Participants agree upon criteria that govern the extent to which data submitted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

Summary Generic Workplan

Key elements:

1. NEWMOA's Board 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.

Generic Project Organizational Chart



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 the NEWMOA Board.
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 Board meetings that are shared with 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 Board meetings that are shared with 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 of NEWMOA's Board meetings, and also in grant reports to U.S. EPA.

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 Board.

Document/record control

The recording media for NEWMOA projects will be both paper and electronic. All electronic records are stored offsite in a cloud-based storage solution provided by Microsoft, known as SharePoint.

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

NEWMOA's Board of 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, 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 will discuss corrective action. If necessary, the Project Manager will issue a stop-work order until a solution is agreed upon. The Project Manager will implement corrective action in consultation with the Board 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.