

MINUTES – NEWMOA CONFERENCE CALL 2/10/09

Subject: Non-Notifiers

States represented during this teleconference included Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island and Vermont. A representative from USEPA Region I was also on this call. The following summarizes the comments made during this teleconference.

EPA:

- Suggested using TRI data to identify potential Non-Notifiers. The numbers from these reports should make us wonder where the waste has gone.
- Facility risk management plans may also indicate that waste is being generated.
- If a company manufactures a product they most likely they generate some type of waste
- Violators of the Clean Air Act may be generators (they have had an accident)

Connecticut

- Had a manifest initiative to check quantities of waste shipped off-site
- Checks Provisional ID Numbers to ensure number is not being used longer than allowed
- Performed several inspection initiatives
 - Auto body shops
 - Junkyards
 - Auto repair facilities
- Has a “Clean Marina Program”
- Question posed to Connecticut: In RCRA-Info, why are some of CT’s Non-Notifier inspections “flagged” so the data is not available? The answer was not immediately available.

Maine:

- Checks Provisional ID Numbers, to ensure number is not being used longer than allowed
- Manifest database used to check quantities of waste shipped off-site
- Manufacture’s registries reviewed to find potential inspection targets
- Performed an industrial park inspection initiative

Massachusetts:

- Checks Provisional ID Numbers, to ensure number is not being used longer than allowed or if too much waste was shipped
- Manufacture’s registries reviewed to find potential inspection targets
- Performed an industrial park inspection initiative
- Uses “InfoUSA” website to find potential inspection targets
- Checks classified adds to see who is hiring
- Has fact sheets advising on notification requirements (e.g. Provisional ID Numbers)

New Hampshire:

- Non-Notifiers discovered via complaints investigated by the Special Investigations Unit
- Performed targeted inspections at dry cleaners and auto body shops
- Encourages waste reduction by offering P2 advice
- Checks telephone books and internet to find potential inspection targets
- Performed several outreach initiatives
 - Hospitals
 - Marinas
 - Salvage yards
- Suggested that nail salons and optical shops may be potential Non-Notifiers

New Jersey:

- Performed several inspection initiatives to find Non-Notifiers
 - Auto body shops
 - Chemical warehouses
 - Big box stores
 - Dry cleaners
 - Scrap yards
- Most Non-Notifiers found via complaints
- Receives cross-program referrals, from within the DEP, advising of potential violations
- Performs Compliance Assistance inspections at facilities that have obtained a new EPA ID Number
- Manifest database used to check quantities of waste shipped off-site
- Unmanifested Waste Reports submitted by facilities are reviewed and investigated
- Reviews ISRA's list of facilities that have closed or changed ownership

New York:

- Checking auto body shops
- Flagging manifests where "CESQG" is entered in the space provided for the Generator's ID Number

Rhode Island:

- Reviews Biennial Reports looking for LQG quantities

Vermont:

- Uses manifest database to check quantities of waste shipped off-site
- Checks Provisional ID Numbers, to ensure number is not being used longer than allowed or if too much waste was shipped
- Reviews Biennial Reports looking for LQG quantities
- Reviews monthly report from Safety Kleen that summarizes generator activity
- Performs compliance assistance in conjunction with other programs
- Performed inspection initiative at old factories that are now offices
- Checks classified ads to see who is hiring

General NEWMOA Notes:

- Bill Cass advised us that an EPA rule on Episodic Generators is in the works
- We discussed the need for a teleconference on the Universal Waste/Pharmaceutical rule
- Bill Cass advised us that the Sierra Club has challenged the new Definition of Solid Waste