

NEWMOA Haz. Waste Training Call
October 9, 2007
Definition of Site for Regulatory Purposes

Participants:

NEWMOA - Bill Cass
EPA Region 1 - Ernie Waterman
CT - Ross Bunnell
ME - Ed
MA - Bill Surrull
NH - Bob Bishop
NJ - Mike Hastry
NY - Michelle Ching & Tom Killeen
RI - Bob Nero
VT - Not on the call

Maine

Looked at this for primarily bridge painting jobs.

Projects from the Maine Transportation Department and Maine Turnpike are the primary sites where they have dealt, and they are not aware of local bridge work of this type.

Judge each project individually by site for waste management and ID # purposes.

Smaller Projects: paint removal - usually a few weeks for the project- issue a provisional # - accumulate onsite and ship within approximately 30 days. Never gets recognized in RCRA Info.

Short term to Long Term projects: where it is hard to leave it onsite. They have them bring it back to the nearest facility in their own vehicle and the waste gets managed under the ID # of the facility where its handled. Under some circumstances it may be managed under the bridge's provisional number.

Long term projects: Assign a permanent Id #. Make them provide a secure area for storage, and have them do a generator closure at the end of the project.

They have no hard line between the three types. The availability of the security of the site has a lot to do with how they handle the project.

Connecticut

Issues surrounding bridges began as a water issue, where their water division pressed hard for containing the wastes from these sites. That led to the waste handling issues including the blast grit being tested and found to be hazardous

They work with DOT who oversees contractors who need to use containment.

They issue a temporary ID # to the bridge, and make them store onsite and do not allow them to move the waste back to other sites.

Manifests are required and logged into their manifest system.

For gas pipelines and utilities they have had issues.

Algonquin Gas - painting and clean-outs along the system generated waste at remote locations.

They historically brought the material back to their Cromwell CT facility, which was acting as a

TSD. Algonquin was required to get a transporter permit and move the materials to a licensed TSD on a daily basis.

Connecticut Natural Gas - Servicing in Manholes- were bringing it back to sites, which were acting like mini-TSDs. Required them to obtain a transporter permit and make arrangement to ship to TSD on a daily basis.

Connecticut is contemplating creating a state only universal waste for these types of utility wastes.

They inquired of NY the status of their utility waste requirement under project XL. - summarized under NY.

Massachusetts

Projects are conducted under the direction of the Mass Highway Dept.'s regional offices. District Engineer supervises the projects and signs the manifests from these projects. They allow the Highway Dept. to use their regional office's ID #s for the individual bridge projects and have them identify the specific location on the site portion of the manifest while listing the regional office under the mailing address of the manifest. They are not allowed to bring the waste materials back to the regional offices due to past problems with that practice.

Biannual reports are filed under the regional office's Id#s for those that are LQGs.

They handle pipeline issues similarly to that of the bridges.

New Hampshire

They had a historic issue with a large number of bridges having an ID#, and waste was transported to central accumulation and storage areas. This was in conflict with NH transportation requirements.

They determined that transportation had to be on contiguous pieces of property (on-site) or directly across roads to meet transportation regs. If they go on public roads they would have to control the right of way.

DOT wanted a universal Id#, but weren't allowed to do that.

There is now a 5 mile cap on transport for this waste within their definition of on-site.

Transport to other sites would require transporter permits, possibly emergency permits.

Storage has to be on-site.

They issue temporary ID#s for all but the largest sites.

New Jersey

Region 2 issues ID#s for NJ.

This is a double edged sword:

- Takes the issue off NJ's back

- However they are seeking authorization for the program

Bridges on the turnpikes all have ID#s

Had issues with PSEG consolidating waste a central facilities

Conform to EPA's definition of site.

They have ended up with many sites having multiple ID#s.

New York

Similar to NJ, EPA region 2 issues the ID#s, and use EPA's site definition.

Adopted the manifest exemption from the military munitions rule.

During the 1980's agreements with the Thruway Authority and the State DOT allowed them to move wastes along their right of ways. These agreements are honored but not extended to other entities.

NY transport requirements are similar to NH's in that our transporter rules may apply to shipments to contiguous properties, even though the military munitions rule wouldn't need the shipments to be manifested. This depends on if the entity can control the entire roadway.

Specific issues arise:

Metropolitan Transportation Authority (mainly NY subway system) generation of wastes along their elevated tracks has led to issues surrounding sites and the ability to move wastes.

Metro North (another part of the MTA) was issued 1 ID number for approximated 100 miles of contiguous track. This leaves them as a LQG and poses a lot of issues surrounding contingency planning, training, municipal notifications and storage.

Rhode Island

The don't have many rail issues, but deal with the others like Algonquin, bridges, manholes and National Grid.

National Grid was generating at remote locations and bringing the materials back to central storage sites which didn't have TSDF or transport permits. NG told this was no longer allowed. Could not consider their networks as fully contiguous - needed transporter permits to move the wastes and TSD permit for central location. They issue either provisional or permanent #s to the remote sites. Provisionals good for 90 days and can be extended another 90. The power line right of ways allow too much public access to have them considered contiguous right of ways for waste movement.