

NEWMOA HW Training Committee

11.December.2007

19 callers

Agenda

State HW program managers/designees are asked to briefly outline their state's policy regarding the participation of HW inspectors in P2, compliance assistance, and other environmental performance improvement issues. Discussion, Q&A and determination of any follow-up activities by NEWMOA/other participants will follow. Please forward any background materials that would be of interest to participants to me or directly to addressees.

CT - Mark Jepson

CT doesn't have a written/formal policy concerning the participation of HW inspectors in P2/Compliance assistance during inspection visits. However, HW inspectors routinely discuss compliance and waste minimization options, and common sense solutions to compliance problems in the course of their inspections. In addition CTDEP operates a dedicated hotline and provides HW training to various business sectors including:

Pit Stops training

Auto recycling forum

Marina training

Also, inspectors have spoken at various other forums and at DEP sponsored events,

Korean fact sheet for Dry Cleaners

Previously offered non-regulatory compliance audits for S & LQGs – with no responses.

In 2007 again – sent out letters and got responses.

Compass Hotline

ConnStep – retired engineers program can be called upon if needed for P2 work

Withhold the assistance option for serious violations or criminal activity.

MA – not on call

ME - Mike Hudson

Don't have any specific formal written policy – to differentiate the roles of outreach and inspector staff. The RCRA staff and Enforcement are located in a different office than the Assistance Office – which is housed in the Commissioners Office.

Priorities: Grants / working with EPA on roles

Provide for complaint investigations and education and regulatory assistance.

Often considered the “Resident Experts” and are called upon to provide speakers at the Assistance Workshops.

Outreach has been provided to:

- Dry Cleaners

- Marinas

- Wastewater treatment facility operators

- Schools

- Utility Commission staff

- And various others

The assistance staff (multi-media) – provides outreach but coordinate with appropriate media to get the information out. Sm Biz Technical Assistance Program.

P2 has a step-up program (like Star Track). Beyond compliance.

To qualify a company into their program they may request RCRA Staff to provide on-site assessment.

But note sent out to

Try to keep P2 Staff (4) and (7) Inspectors/Enforcement program – working with them with ERP initiatives.

Still trying to maintain a Black Hat vs White Hat separation - Where P2 does provide the assistance.

Facilitating the outreach through the Assistance Office – although able to offer
HW Priority is meeting EPA's annual goals/grants.

Product substitution – accessing the UMASS option

NH - Tod Leedberg

P2 is part of all agency goals

Trying to incorporate P2 in everything they do, Inspections, outreach, etc. for the last 10 yrs.

Separate P2 Program – multi-media, operated out of the Commissioners Office. On-site, assessments, informal and cooperative.

Formal inspections operated from their RCRA Office –

Education & outreach

The inspectors try to do it all

Guidance documents, fact sheets, coordinated training program. P2 is incorporated in all of these.

½ day training with P2 staff

trainings with solid waste
colleges, hospitals

Hz Waste Assistance Hotline maintained

To speak with an Inspector (Can be anonymous – but better answers are possible with disclosure)

CEG self-certification program.. every 3-years

In order to change their status/generator status or elimination

Regulatory interpretations written – Epi for instance

Inspections are the priority and P2 is not really brought into the day..

Generic P2 referral language is included in all NOVs, letters.

AO Brochures used to be handed out at every inspection – then stopped. Looking at doing that again.

SEPs are now including P2 work

Assistance Staff:

All DES staff (including Sr leadership and Admin Staff) get a P2 Orientation Training -

Once a sector is completed – on Marina's etc...

A meeting with inspector staff afterward

Used to have an ICE Team – not now.

Regularly attend calls & training

Maintaining regulatory connections on a daily basis

Sarah: Tracking workshop attendance and determining if there are changes made some time later with phone calls.

Success stories are documented. Generally 20-30 attend workshops and usually 15 facilities. And only 2x a year.

Using interns.

5yrs into the program – CEGs

50% reduction in generator classification.

David Russo is the contact for the CEG Self-Certification Program 603-271-6425

NJ – Brett Reburn

Office of P2 and Right-to-Know separate from compliance & enforcement

HW seeking additional training from this group

Long list of materials on the web site

Multi Media

At Hazardous Waste

An extensive Compliance Assistance Program

A Compliance Assistance Visit (CAVs) -- for those with brand new ID Numbers. Provide full inspection – and may overlook smaller issues that are corrected.

Compliance Assist Packages – offered

Extensive web site

C Hot Program (county programs)

Offers outreach and is reaching the smaller facilities like: dry cleaners, body shops, etc. in their areas. They offer training and outreach.

RCRA staff provides an annual / day long Hazardous Waste Workshop.

Community has access to data base to see if a facility is compliant.

(Terry Goldberg noted) Rutgers University is providing technical assistance – onsite, etc.

NY – Tom Killeen

NY RCRA runs an outreach effort - like CT's program

State law currently precludes Inspectors from providing P2 in field. Inspectors must report “all” violations (by statute)
Looking to change that.

Outreach provided by a private firm (Environmental Facilities Corporation) through 507 monies (Air). On-site, workshops, etc. Web site: www.nysefc.org/home/index.asp?page=20

Hotline provided by RCRA Office with calls coming in from all sorts of generators (anonymous or not). They answer most questions without needing a facility name/location.

Regional Offices –

A great number of calls coming into the regions. They provide a great deal of assistance for waste issues.

As part of the Inspections – some waste stream outreach is provided -- like mercury containing lamps and electronics.

P2 Unit does work with Inspection Staff

They provide handbooks, fact sheets, etc. (reviewing hazardous waste information before publishing).

Many manuals out – educational videos (marinas and ski industry)

“Green Cleaning” - the schools initiative (ongoing)

Audits are being done through outside source (not RCRA Inspectors).

ERP program for Auto Body - just kicking off – Inspector staff in charge. P2 added a section / Energy Reduction section... and other Agency's have added information into program.

RI - not on call

VT - Judy (Environmental Assistance Office - EAO) for our RCRA Section

1. Providing relevant outreach documents at all inspections (no matter the size)
2. Discuss the standards / criteria for compliance and offer possible suggestions in order to comply
3. Quarterly meeting with EAO staff to keep everyone informed of problems in the field – possible fact sheets to be written, workshops, etc.
4. Workshops (7-8 annually) for CEGs done jointly with EAO staff.
5. Referencing EAO in all Notice of Alleged Violation letters – may request that a minor violator to follow-up with outreach staff.
6. Provided the technical information for the CEG online course -- www.vtceg.org (can get certification) The site now also boasts a Virtual Room
7. School clean-out program wrapped up – but occasional school to attend to work with
8. www.eaovt.org/sbcap/index.htm to find the outreach material for Vermont DEC
9. EAO staff was cross trained by RCRA staff (an ongoing process).

Follow-up: NEWMOA to provide links to all states on-line resource information

January 8th next call

Substituting non-hazardous materials