

New Hampshire Department of Environmental Services (DES)
NEWMOA HW Training Call – December 11, 2007
State HW Inspector P2 Role

P2 part of all DES's goals and incorporated into our strategic plan. DES policy that all employees be trained in P2.

DES has a separate P2 Program – who do on-site P2/assistance work (informal and cooperative relationship). Inspectors do not do on-site P2/assistance work (formal and potentially adversarial relationship).

HW Inspectors role in P2:

1. Education/outreach – fact sheets, guidance documents, training. NH has a Certified Hazardous Waste Coordinator Program where generators come to get trained/certified. Basic class has a P2 component where P2 is defined, benefits explained, and sources of help provided. Coordinator Program also has an Advanced Module for P2 provided by DES P2 staff. NH Small Quantity Generator
2. Technical Assistance – HW inspectors maintain a telephone hotline. Technical assistance also provided through the Small Quantity Generator Self-Certification Program – particularly companies wanting to get out of the requirement (fee and self-inspection every 3 years) by eliminating hazardous waste generating processes. Prepare regulatory interpretation letters on specific issues on how rules apply (e.g., Epi letter).
3. Inspections – some assistance on-site but main purpose is to gather info for compliance determination purposes which may result in enforcement/fines. All informal enforcement actions following up an inspection have a referral to the Department P2 Coordinator using below language.

“It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental quality goals. We strive to ensure that pollution prevention options are considered first, followed by recycling, treatment, and disposal. I am requesting that the DES's Pollution Prevention Coordinator, Stephanie D'Agostino, contact you to discuss possibilities for waste minimization or source reduction at your facility. In the meantime, if you have immediate questions about pollution prevention, please feel free to contact her at (603) 271-6398.”

4. Formal Enforcements – in both administrative and civil enforcement cases, DES sometimes uses Supplemental Environmental Projects to settle cases. SEPs are often P2 or pollution reduction related (e.g., process/material change). Company still needs to have a minimum cash payment (25%) but can reduce amount of cash paid if settle with an SEP.