

NH Green Yard Program for Auto Salvage Yards *Successes & Challenges*



Pamela Hoyt-Denison, P.E.
Administrator, Waste Programs
N.H. Department of Environmental Services
www.des.nh.gov/sw/greenyards

NEWMOA Web Conference
May 2008

1999- 2002:



Auto Salvage Becomes Priority

- Became clear auto salvage industry needed attention...
 - Frequent complaints--*Air, Water, & Waste Violations*
 - Many contaminated sites due to spills / leaks—MtBE, etc.
 - Regulatory confusion--internal & external: “Who does what?”
 - Lack of environmental awareness within the industry
- NH’s unlined landfill closure program was winding down...
 - Seen as an opportunity to eventually shift resources to new sector
 - DES began designing program to improve environmental performance at auto salvage yards

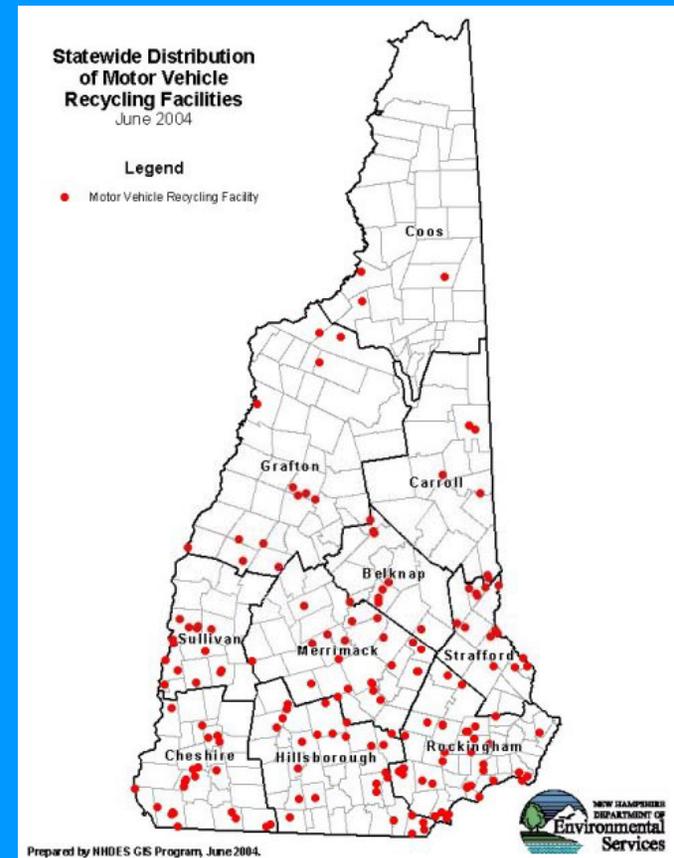
Step #1: Industry Fact Finding

- Established Stakeholder Work Group
- Random site visits throughout the state
- Baseline questionnaire in 2002
 - Gathered data re: scope of activities, size, typical work practices
- Other research—
 - Existing applicable regulations
 - Industry economics
 - Information from other States
 - Contaminated sites info

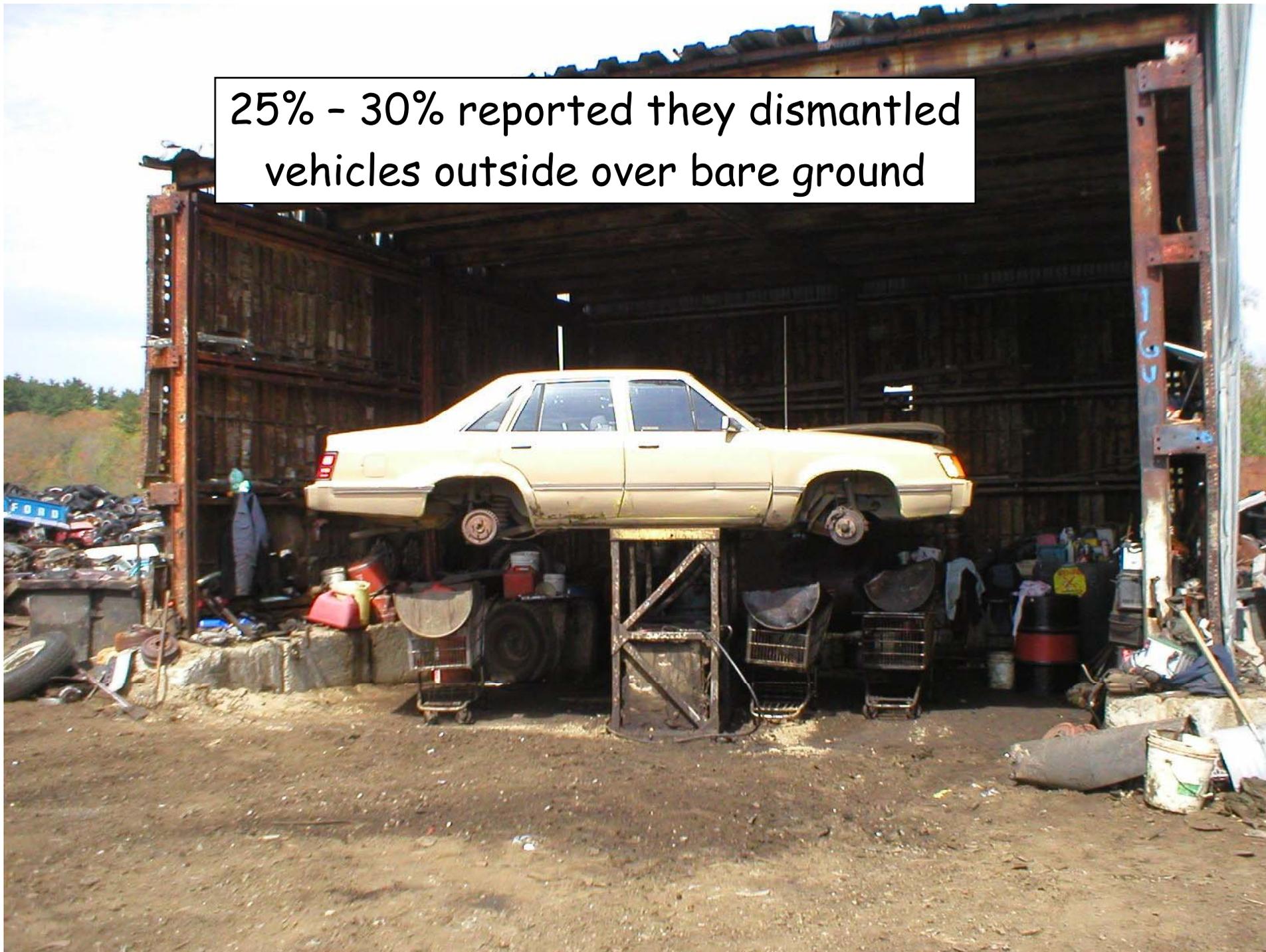


Profile of Auto Recyclers in N.H.

- Family owned / passed down to next generation
- Less than:
 - 5 employees
 - 5 acres of land
 - 500 vehicles stored / processed yearly
- Multi-function
 - auto body / repair / service
 - auto sales
 - towing yards
- Poor operating practices, for example...



25% - 30% reported they dismantled vehicles outside over bare ground





Less than 15% reported using leak containment systems for fluid storage.

Less than 10% reported protecting the ground when crushing.





Over 75% reported improperly stored tires



Many had no standard operating procedures, resulting in very poor housekeeping practices and inability to access, inspect and manage inventory.

Obstacles to Changing Behaviors



- Lack of Effective Communication
 - Literacy issues
 - No Internet
 - Jargon: “Bureaucracy Speak” vs. “Industry Speak”
 - Lack of Trust (2-way)
- Generational Issues / “Always done it that way...”
- Lack of Environmental Awareness & Stewardship
- Lack of Resources / Funds
- “Unfair Competition” / “What’s in it for me?”
- Nature of work can be physically challenging
- Regulatory Confusion (State ↔ Local)

Step #2: Two Phase Strategy to Overcome Obstacles



- Phase I—Education & Compliance Assistance
 - Improve environmental awareness
 - Build a working relationship with the industry
 - Provide compliance information & tools
 - Instill pride and show benefits of being “green”
- Phase II— Compliance Assurance
 - Shift burden for compliance assurance from DES to the facility and other stakeholders
 - Build better system of accountability

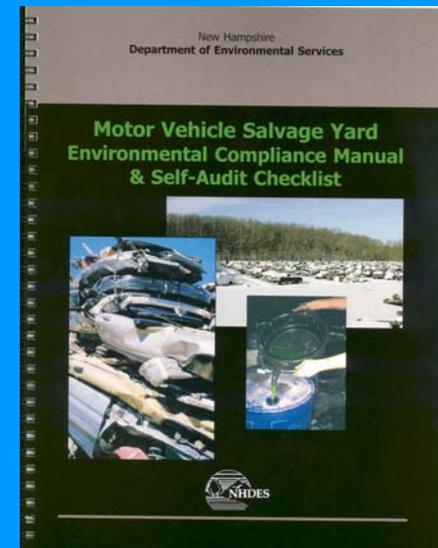


Phase I: Education & Compliance Assistance

- Develop and teach Best Management Practices (BMPs)
 - Guide sheets, videos, workbooks, postcards, other tools
 - Training workshops— *operators, town officials, consultants*
 - Compliance assistance tools: *labels, evacuators, drip pans, etc.*
- Confidential on-site technical assistance by P2
- Pilot program to recognize yards that go “beyond compliance” (*Certified NH Green Yard*)

Phase II: Compliance Assurance

- Owner self-inspects & certifies compliance, using workbook / checklist
- DES inspections: *random & target*
- Enforcement & penalties: *Highly visible*
- Institutionalize the “beyond compliance” recognition program (*Certified Green Yard Program*)



That WAS the plan, but it detoured...

- 2002—Massive staff reduction in SW Program
 - *Remember the unlined landfill staff?---Gone*
 - *Limped along slowly with Phase I*
 - *No staff to implement Phase II effectively*
- New Legislation—New Opportunities?
 - 2007---*Requires Town Officials to have operators certify compliance with BMPs when applying annually for a required local “License to Operate a Junkyard”*
 - 2008---*Requires DES to establish a General Permit for Auto Salvage Yards and Auto Crushers*
 - Permit conditions = BMPs
 - Process similar to federal Storm Water Permitting Process



Good news... now all players are off the bench & in the game

- BMPs are the center of new three way partnership
 1. State Government---DES
 2. Town Government
 3. Salvage Yard Operators



- Will it work?
 - Time will tell ---we're in a transition phase
 - Opportunity for players to communicate & work better...
 - DES lacks resources to inspect and enforce
 - Town officials can help monitor conditions & screen complaints
 - Facility Operators are now accountable to both DES & Town
 - Local Licenses & State General Permits are linked to maintaining BMP compliance
 - Environmental performance expectations are more clear
 - Everyone is starting to talk and compare notes...

Performance Measurements

What have we accomplished?



2005 -2006: Inspected 180+ facilities

- Evaluated compliance with BMPs in 9 major topic categories:
 - *Fluid Management*
 - *Greasy Oily Parts Storage*
 - *Battery Management*
 - *Scrap Tire Management*
 - *Freon / Refrigerant Recovery*
 - *Wastewater Discharge*
 - *Crushing Practices*
 - *Site Control /Housekeeping*
 - *Other Concerns*
- Issued BMP “Report Card” on spot
- Owner is expected to correct problems





2005-2006 BMP Inspection Results

- 30(+/-) facilities got a “passing grade” in each of the 9 BMP categories
- Typical problems at the other facilities:
 - *Fluid Management, e.g. draining & storage*
 - *Failure to clean up and report spills / leaks*
 - *Oily, greasy parts storage*
 - *Freon / refrigerant recovery*
 - *Excess accumulations, e.g. tires, vehicles, parts*
 - *Paper work, e.g. tank and burner registrations, record keeping*
- 12(+/-) facilities were directed to do remedial work due to spills and leaks

(Some) Measurable Improvements since 2002 baseline survey...



- Many yards have voluntarily made capital improvements... *buildings, pads, new equipment*
- 50% improvement in # of yards storing gasoline under a roof
- 62% improvement in # of yards storing gasoline inside secondary containment
- 23% improvement in # of yards properly storing tires
- 20 yards became *Certified NH Green Yards*

2005-2006 Inspection Results

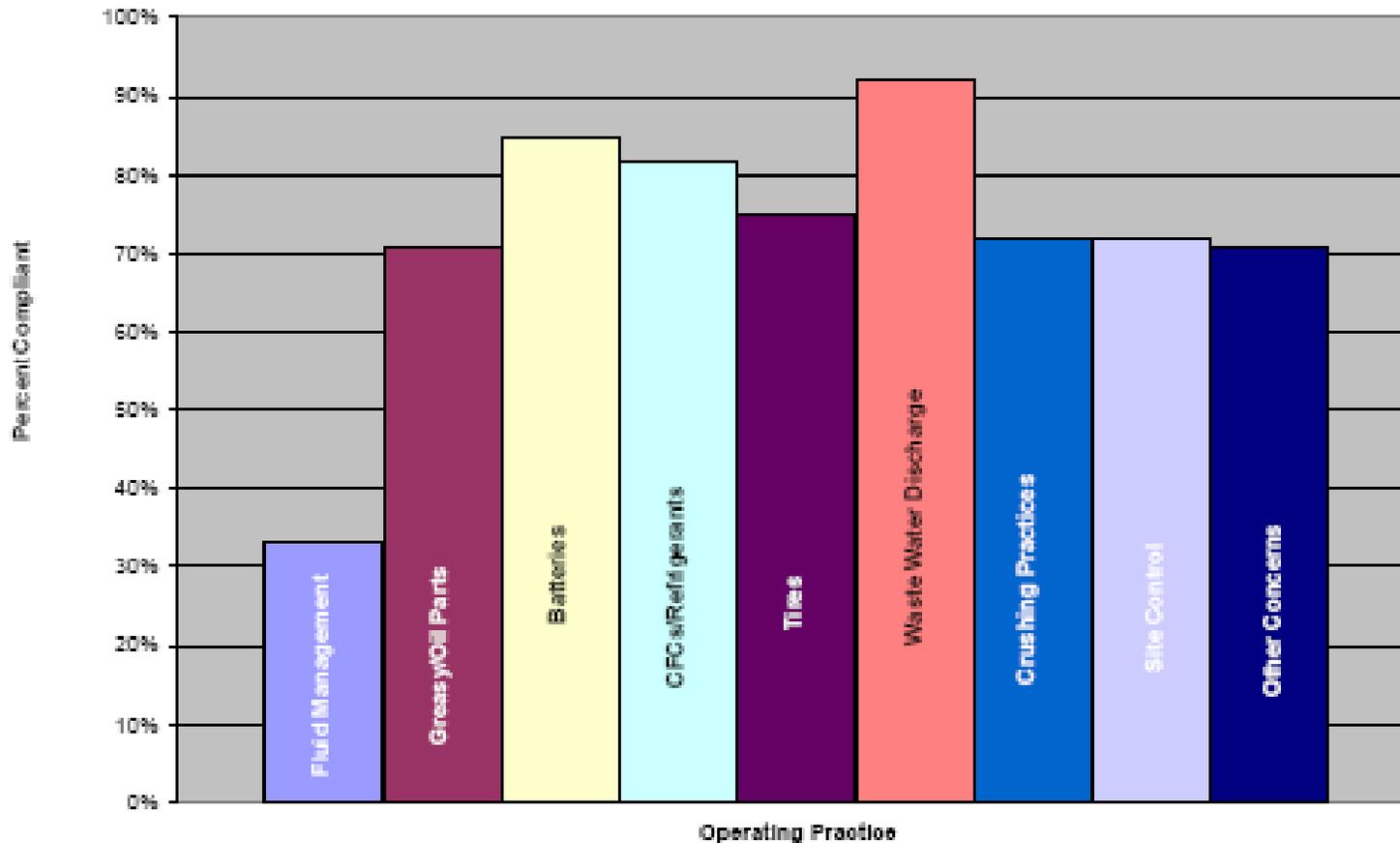


- Despite some measurable improvements since 2002 baseline survey:
 - Less than 15% of the facilities are compliant in all 9 BMP categories, i.e., 85+% of the yards are not in full compliance
 - Less than 35% of the facilities are fully compliant with fluid management BMPs
 - In remaining 8 BMP categories viewed separately, there is 70+% compliance



Compliance Rates at Auto Salvage Yards

(based on most current data available from inspections completed in 2005-2007 database)



The data show some facilities are doing a good job with some BMPs, but very few facilities are doing a good job with all BMPs



Other Performance Measurements

- 20 yards became *Certified NH Green Yards* in 2006 during pilot program
- Re-visited yards in 2007
 - Results were disappointing
 - Backsliding: non-compliance with BMPs
 - Need to find ways to assure sustainability



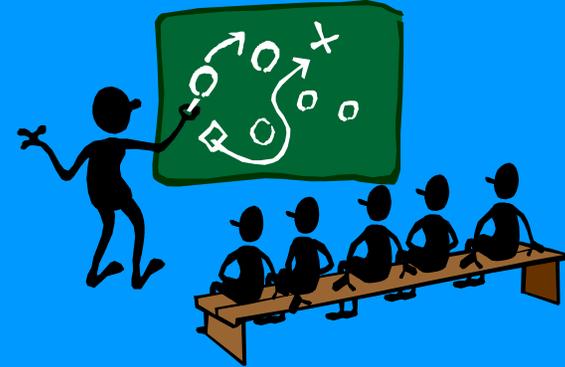
Success or Failure?

- Education alone was never expected to be enough
- Phase II is just starting
 - Inspections
 - Enforcement / Penalties
- Challenges in Phase II
 - Lack of resources to conduct inspections & pursue enforcement actions
 - Internal resistance to cross-program enforcement actions
 - Reluctance to “cease & desist” operations
 - Database weaknesses
 - Seasonal constraints



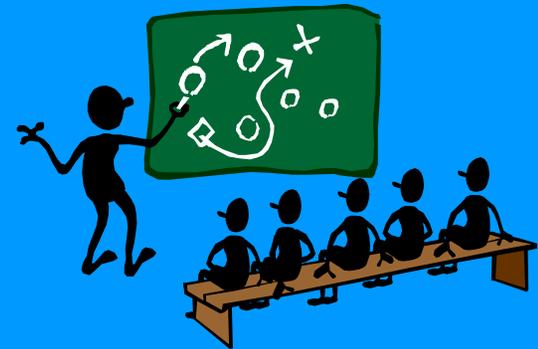
Need to Continue Educating All Stakeholders

- Local Licensing & Code Enforcement Officials
- Salvage Yard Operators
- Consumers
 - ✓ Citizens
 - ✓ Vehicle Owners
 - ✓ Insurance Companies
 - ✓ Dealers
 - ✓ Fleet Managers, etc.
- Environmental Consultants
- DES staff



Future Education Efforts

- Additional regional BMP workshops
 - Fluid Management
 - Cleaning Up & Getting Organized
 - Establishing Standard Operating Procedures (Benefits)
 - Material Handling & Inventory Control
- (Possible) Mandatory operator training & certification as a condition of the General Permit
- Annual training for municipal officials
- On-line interactive training
- Consumer education
 - Posters
 - Vehicle registration flyers



Thank you.

