

New Hampshire's Hazardous Waste Generator Certification Program



Tim Prospert
NHDES

Hazardous Waste Certification Programs

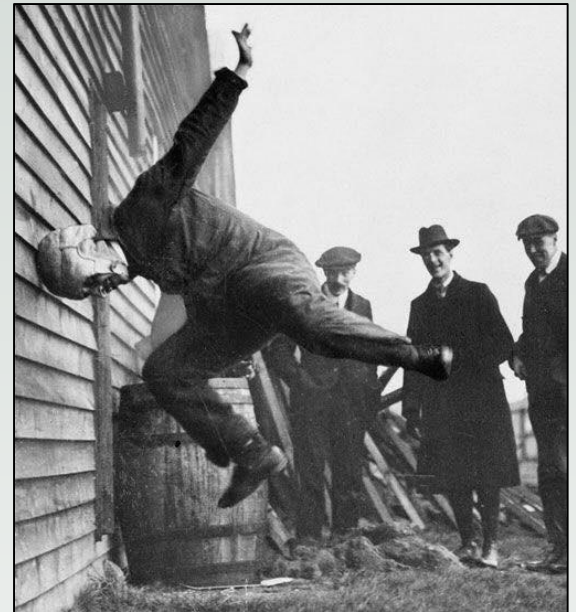
The Problem

- ▶ Inspect & Enforce
 - Low compliance rates
 - Same issues repeatedly
 - Major components missing
 - Generators don't know or don't understand the rules that apply to them



The Problem

- ▶ Educate generator through inspection, but staff departure results in loss of knowledge
- ▶ Private trainers and transporters flawed
- ▶ Inspection alone not working



Outreach and Education?



What is it?

- ▶ Require at least one staff member from each facility generating >220 pounds per month to get certified through NHDES
- ▶ NOT voluntary
 - Failure to participate increases inspection priority



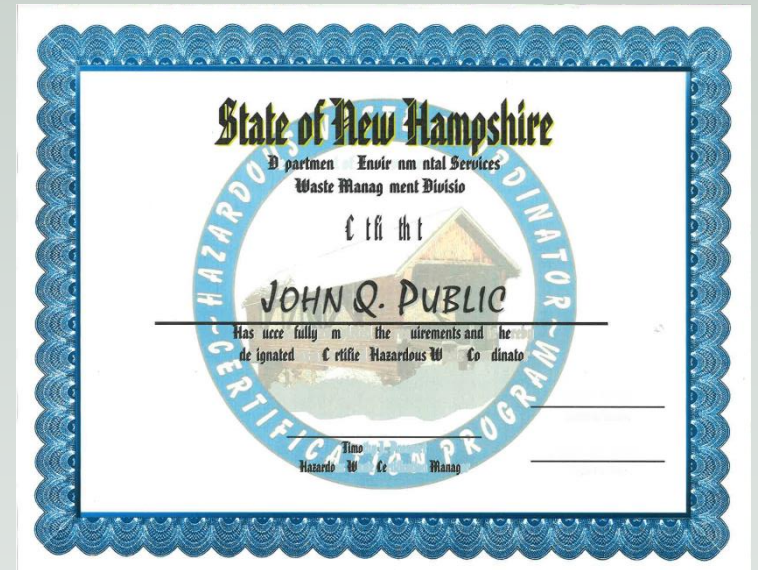
Hazardous Waste Coordinator Certification

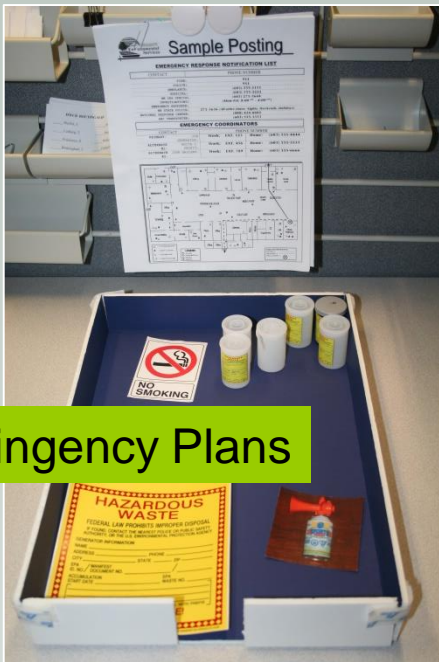
- ▶ Understandable concern and pushback
 - Generators – “Another example of government intervention”
 - “You want ME to be responsible for them?”
- Professional trainers – “You’re stealing our business!”



Hazardous Waste Coordinator Certification

- ▶ First-time “Basic” Class
 - Full day
 - Must pass exam





Contingency Plans



Waste Minimization/Pollution Prevention



Waste Determinations I & II



Inspection & Enforcement

Tailor to the individual generator

- ▶ Copy of their current notification form
- ▶ Copy of an annual summary of their waste shipments
- ▶ Delinquent paperwork, if any
- ▶ Reminders of any permit renewals
- ▶ Alert of any missing contingency plans

	RCRA C SITE IDENTIFICATION FORM Notification of Hazardous Waste Activity NHDES Waste Management Division-RIMS PO Box 95, Concord NH 03302-0095 (603) 271-2921 or hazwastereporting@des.nh.gov www.des.nh.gov	
Rule: Env-Hw 504.02(a)		
EPA ID No.	NHD987654321	Attendee: John Smith
1. Reason for Submittal and Effective Date	Enter effective date here <input type="text"/> then check the correct box. <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, including universal waste or used oil activities). To ensure that your notification is processed	

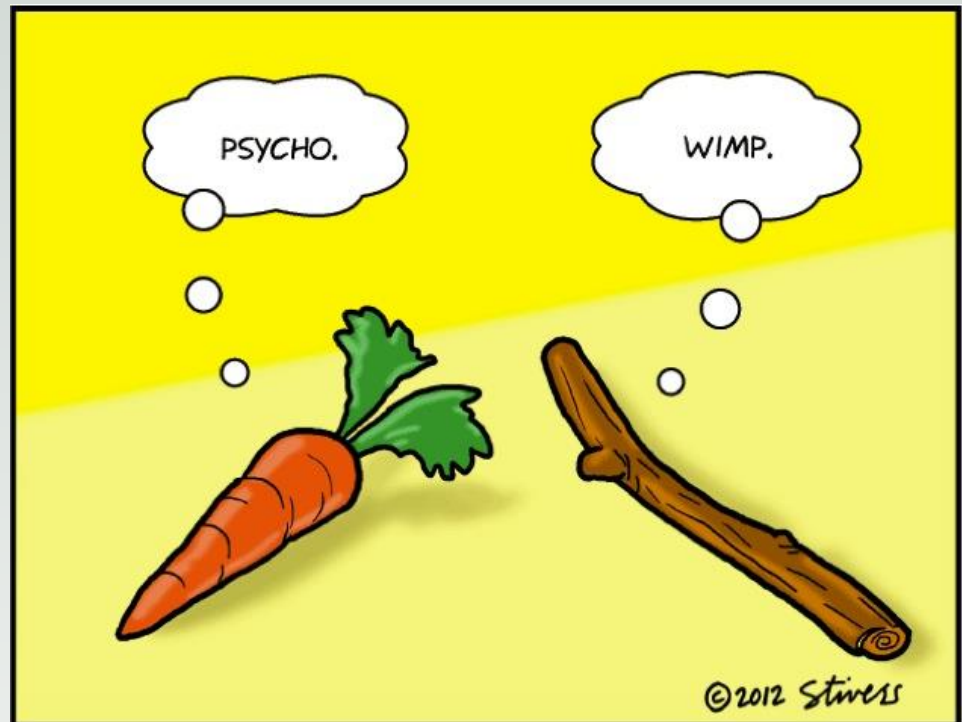
Wall of Fame

1. JMD, Hudson, 2017
2. NASHUA HHW COLLECTION, 2017
3. BAE, Hudson, 2016
4. EVERSOURCE, Hooksett, 2016
5. A-PLUS FINISHING, Hudson, 2016
6. TELEDYNE D.G. OBRIEN, Portsmouth, 2015
7. K.W. THOMPSON, Rochester, 2013
8. BURNDY, Lincoln, 2013
8. BOMAR, Charlestown, 2012
9. FREUDENBERG, Manchester, 2012
10. EVERSOURCE (PSNH), Bow, 2011
11. EVERSOURCE (PSNH), Portsmouth, 2007
12. LONZA BIOLOGICS, Portsmouth, 2006
13. NOVO NORDISK, Lebanon, 2005
14. GE AVIATION, Hooksett, 2003



Hazardous Waste Coordinator Certification

- ▶ Integrated with inspection team
 - Not an isolated group
 - On the same page
 - They teach!
 - Latest interpretations
 - Hear what problems need fixing
- ▶ Carrot AND stick
 - Same goal



Funding / Budget

▶ Self-funded

- Statute requires \$125 base fee
 - Includes a provision for additional reasonable fee to cover classroom expenses
 - Currently \$175
- Pays for two FTEs + other operating expenses
- Best bargain around!



Is This Program Perfect?

- ▶ Training isn't tailored for some sectors
 - Healthcare
 - Retail
- ▶ Not applicable to federal VSQGs
- ▶ Developing new classes can be time-consuming
- ▶ Don't (consistently) reach upper management

Perceived Positives

- ▶ Increased generator knowledge!

*KNOWLEDGE IS
POWER.*

FRANCIS BACON

INSPIRATIONEVERLASTING.COM

Perceived Positives

- ▶ Face-to-face contact



Perceived Positives

- ▶ Inspectors have a better sense of issues at generator facilities
- ▶ Generators and inspectors speak the same language
 - Quicker resolution of issues/less ill will



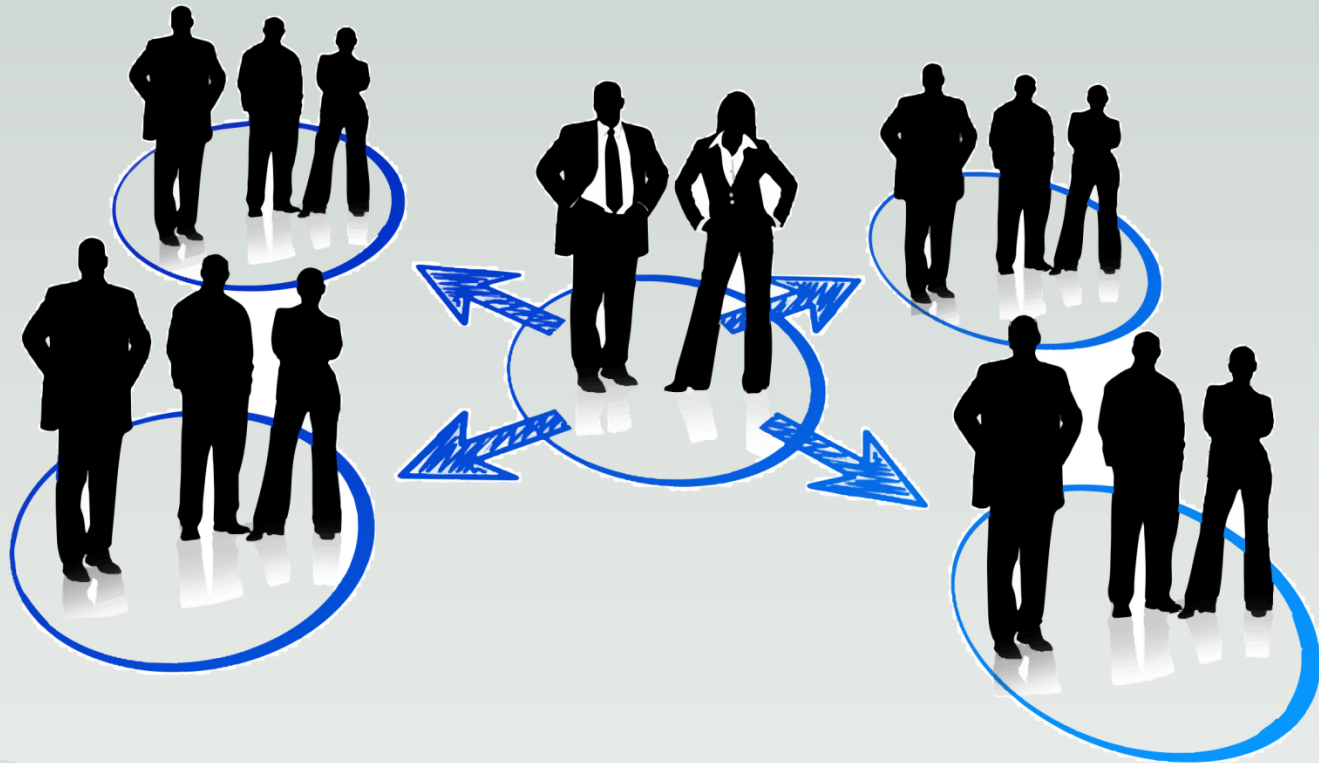
Perceived Positives

- ▶ The attendance of transporters and consultants



Perceived Positives

- ▶ Gateway to Other Regulators
 - Point of contact



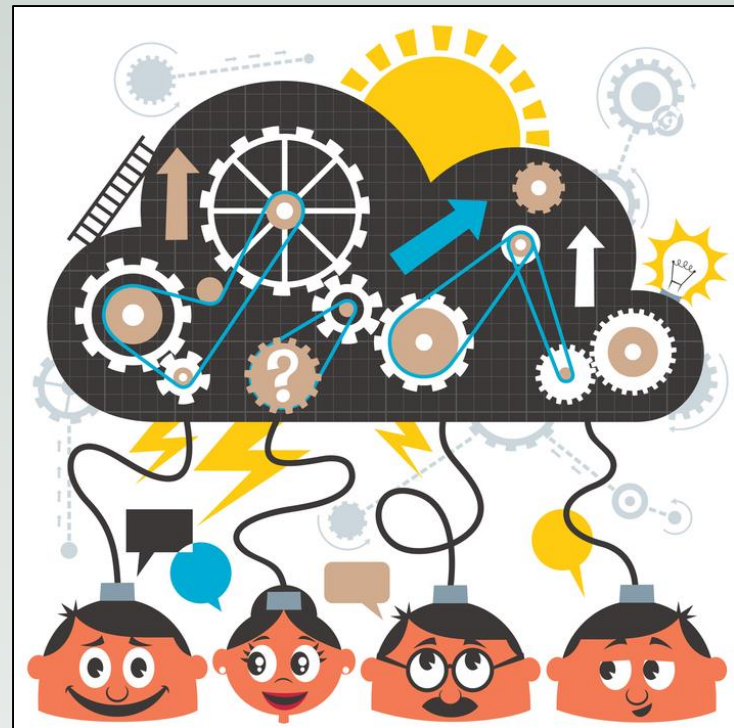
Perceived Positives

- ▶ Increased inspector (and trainer!) knowledge of rules



Perceived Positives

- ▶ Generator is focused on RCRA for at least one day/year
 - Look at my nose!
 - No distractions
 - Brainstorming



Perceived Positives

- ▶ Data Cleanup
 - RCRA C Site Identification update annually
 - 600+ SQGs/LQGs → ~325
 - Late “quarterlies” and missing manifests

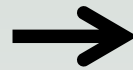


That's what we "KNOW"
But what can we SHOW?



Measuring Program Value

- ▶ Compliance before program v. after program
 - Violations/inspection
 - Fines/inspection



Measuring Program Value

- ▶ Small sample size
 - Small number of inspections
 - Not many years of data



Confounding Variables

- ▶ Enforcement standards evolved
- ▶ Inspection standards evolved
 - Inspectors developed increasing skill
 - Teaching, resolving grey areas
 - Years of Service
 - Facilities held to higher standard as big issues diminished



How else can we evaluate this program?

- ▶ David Hindin
- ▶ Dr. Sarah L. Stafford

NH Objective(s) of the study

- ▶ Assess the value of the program
 - Try to verify it's worth



\$0.97/pound

or



\$20,203/pound

W & M Objective(s) of the study

- ▶ First step in answering a key question:

What is the right balance between enforcement and assistance?



<http://des.nh.gov/organization/divisions/waste/hwcb/hwcs/hwccp/index.htm>