Welcome to the Hazardous Waste Certification Programs

A Different Kind of Dining Experience

With your Hostess

Susan Francesco
What’s Cookin’?

Appetizer
How did YOU do?

All Correct 100% Compliance
2 Correct 66% Compliance
1 Correct 33% Compliance
0 Correct – 0 Compliance
What?!
Non-compliance is UNACCEPTABLE!!!

BUT...

- Too many priorities!
- I know how to be safe!
- Too complicated!
- Somebody else told me I was OK!
- Information used infrequently!
There HAS to be a better way...
There Is!
A Different Kind of Arm Twisting…

Better Living Through Forced Assistance

The NH Hazardous Waste Certification Programs
Let’s Talk Turkey

The Entrée
What is the HWCC Program?

**Required** Training of all NH “Full Quantity Generators”

- At least one person on staff at each facility
- Full day of DES-hosted RCRA training
- Win-Win for Training & Inspection!
How Does it Work?

- Basic introductory class
- All first-timers take the basic class, and exam
  - Not a gimme!
  - Certification good for one year
Follow-up Modules Offered

- Contingency Plans
- Waste Minimization/Pollution Prevention
- Waste Determinations I & II
- Inspection & Enforcement
“Have it your way!”

Tailor to the individual generator

- Copy of their current RCRA C Site ID
- Copy of their Annual Summary of Waste Shipment
- Notification of any missing Contingency Plans

(Examples in back of room)
Recognize Attendees as Valuable
Data Management

- Oracle database
  - Developed in-house
- Records of registrations, attendance, test scores, etc…
- The ability to print reports and statistics
- Send mass emails to attendees/registrants
How is it Received?

- Initial apprehension
  - Private trainers
    - Threat to livelihood
  - Generators
    - Another useless rule!
    - Worried about personal liability

- Paradigm shift in generator attitude
Attendance

- **320 facilities** required to attend
  - 407 facilities, 937 attendees in 2012
  - 200 first-timers

First three years/last 8 years

### Total Attendees

<table>
<thead>
<tr>
<th>Year</th>
<th>Attendees</th>
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<tr>
<td>2003</td>
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<tr>
<td>2011</td>
<td>876</td>
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<tr>
<td>2012</td>
<td>937</td>
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</tbody>
</table>
Funding/Budget

- Self-funded
  - Best bargain around @ $250 per person
Happy Endings

Dessert
Benefits

**Expected**

- Generator knowledge
- More Compliant
# of Violations per Inspection

![Graph showing the number of violations per inspection from 2005 to 2012. The number of violations decreases over time.]
Unexpected Benefits
Break Down Barriers

Communicate Clear Expectations
Face-to-face contact and communication

The attendance of transporters and consultants

Data Clean up
Lighter Fare

Soup and Salad
Small Quantity Generator Program
State divided in thirds/population

**Certification Due**

1/1/2012

1/1/2013

1/1/2014
The Self-Certification form

- Mail form to them once every 3 years
- Offer training
- Track in a database
- SQG manager reviews – culls out incomplete, incorrect, inaccurate forms and follows up
  - Compare to manifest data
  - Compare notification data
The fee

Once every three years

- Pay a fee of $270 ($90/year)

Delinquents go to enforcement

- 3-5 per year
Added twist – summer interns

- Compliance assistance intern
  - Visit an Average of 90 SQGs/summer
  - Brought 82% into compliance
  - Bonus: Brings in $ to pay salary

- Compliance evaluation intern
  - Visit an average of 135 SQGs/summer
  - 81% in compliance
NH’s Certification programs
NH’s Certification programs
Now... Who's Hungry?!?!