

# Hazardous Waste Management Bureau

Presented by Todd Piskovitz, P.G.

**HAZARDOUS  
WASTE** Profile No: 26144-001

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.  
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME [REDACTED] PHONE [REDACTED]

ADDRESS [REDACTED]

CITY Concord STATE NH ZIP 03301

MANIFEST TRACKING NO. [REDACTED] ACCUMULATION START DATE [REDACTED]

EPA ID NO. [REDACTED] EPA WASTE NO. D001

RQUN1993, WASTE Flammable liquids, n.o.s. (petroleum distillates,  
ink)

3, PGII (RC D001)

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX  
Waste Name: Press Wash Solution

**HANDLE WITH CARE!**

STYLE CFWM57

LABELMASTER® (800) 621-5806 www.labelmaster.com

ACEC-NH – November 18, 2022

## Previous Remediation-focused HW Presentations

Zach Lorch

*Is My Remediation Waste Hazardous?*

ACEC April 2019

*Ex-Situ Management of Remediation Waste*

ACEC April 2021

John Duclos

*Requirements for Remediation Waste*

NEWMOA Conference June 2019

*How NH HW Rules Apply to Remediation Waste*

NHDES/BIA “Consultants’ Day” September 2019



# Hazardous Waste compliance assurance achieved through a tiered approach:

*Education*

*Certification*

*Assistance*

*Monitoring*

*Enforcement*



# Waste Management Division

Director  
Michael Wimsatt

Assistant Director  
Sarah Yuhas Kirn

Remediation  
Programs

Hazardous Waste  
Remediation

Oil Remediation &  
Compliance

MtBE Remediation

Waste Management  
Programs

Hazardous Waste  
Management

Solid Waste  
Management



# Hazardous Waste Management Bureau

Administrator  
**Todd Piskovitz**



Authorization  
Section

**Wendy Bonner**



Certification  
Section

**Tim Prospert**



Reporting  
&  
Information  
Section

**Maria Michel**



Compliance  
Section

**Tod Leedberg**

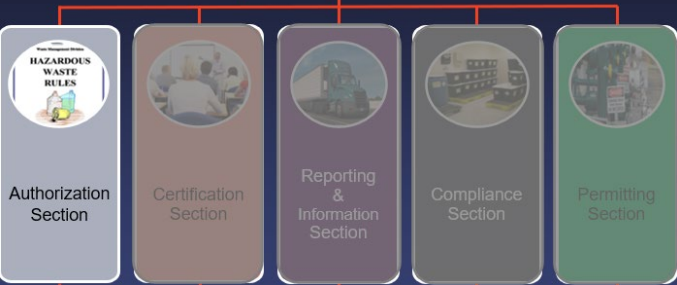


Permitting  
Section

**Julia  
Sunderlin**



**Administrator**  
**Todd Piskovitz**



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# Authorization Section

Section Supervisor: Wendy Bonner

## Authorization Section Responsibilities

- Rulemaking: federal regulations, state statutory requirements
- Maintain authorization to administer RCRA on EPA's behalf
- Once authorized, federal regulations cease to exist; EPA enforces New Hampshire's rules.

federal register

p. 242 -61632	Thursday December 17, 1
<b>Highlights</b>	
61442, 61485	Agriculture— on delinquen Credit System
61560	Air Transport Microwave L Federal navig
61486, 61489	DOT/FAA w noise and dig
61484	Nuclear Pow petition to ex
61531	Mass Transp availability o transportatio
61450	Air Safety 1 evacuation d
61612, 61613	Air Pollution proposes to a stationary so sources. [2 d
61460	Postal Serv or terminatio
61454	Securities brokers and
CONTINUED INSIDE	

2022

Adopted HW Pharmaceuticals,  
UW Aerosol Cans Rules

2023

Authorization

2024

Adopt Used Oil, Generator  
Improvements Rules

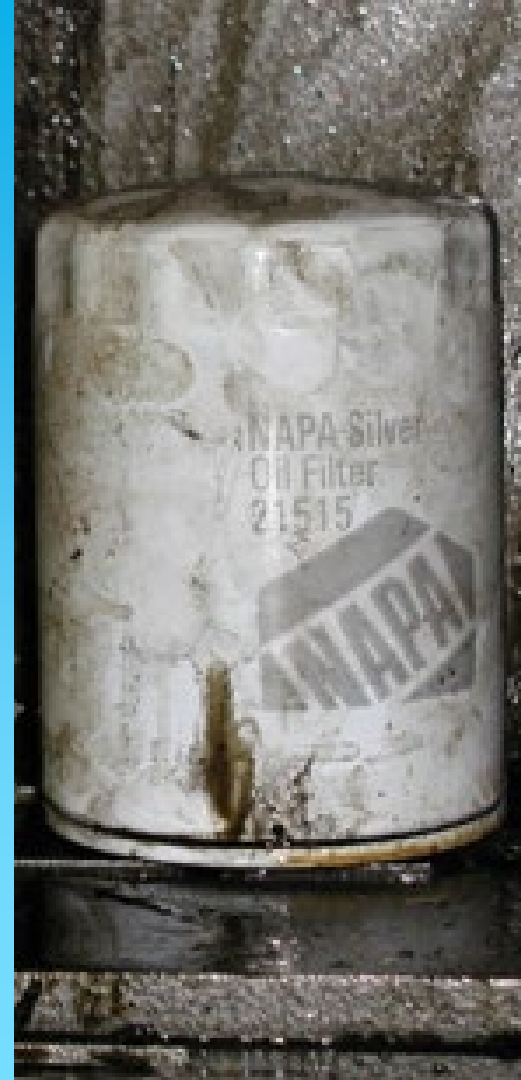




## Recycling of Used Oil (40 CFR 279)

Update NH's rules for Used Oil handlers:

- Generators
- Collection centers
- Transporters
- Marketers
- Processors and re-refiners
- Burners



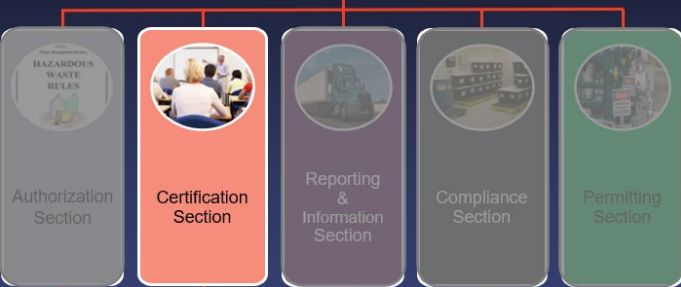
# Generator Improvements Rule

- Container/tank labels must indicate the hazards posed by the waste inside.
- Quick Reference Guide for easy access during an emergency event.
- Closure requirements
- Renotification requirements
- Episodic generation of hazardous waste (e.g., tank cleanout, short-term maintenance project).

Align NH's generator category names  
with federal names.



**Administrator**  
**Todd Piskovitz**



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# Certification Section

**Tim Prosper**  
**Administrator**

**Judy Small**  
Prog. Assistant

**Julie Ashton**  
HWCC Program  
Manager

**Christie Faro**  
SQG Certification  
Program Manager

# (NH)SQG Self-Certification Program – WHY?

- Many SQGs (~2,000)
  - Low chance of inspection
- Limited Resources
  - For the Business
  - For NHDES
- Environmental Impact of so many SQGs



# How it Works

- The SQG self-inspects their facility with a form we provide (every 3 yrs)
- The SQG identifies any problems and corrects
- The SQG completes the self-inspection form and sends it in with fee (\$270)
- DES provides additional free assistance and training
- DES does limited staff inspections and performs numerous audits with interns



# FQG Hazardous Waste Coordinator Certification - Why?

- Lots of waste, lots of risk
- More rules to know
- More prone to staff turnover





# How it Works

- At least one certified coordinator at facility
- Certified annually
- Training by DES
- Annual refresher
- No certified coordinator increases priority for inspection



# Goals for these Programs

- Increased face-to-face contact
  - Crucial component of programs
    - In-person coordinator training
    - On-site FQG audits
    - SQG Welcome Wagon
    - Increased SQG onsite assistance
    - Intern on-site assistance/surveys
- Increased multi-media presence
  - Continued online training
  - Posted compliance assistance videos



**Administrator**  
**Todd Piskovitz**



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# Reporting & Information Management Section

**Maria Michel**  
Section Supervisor

**Alyssa Moodie**  
Program Specialist

# Reporting & Information Management Section (RIMS)

## Responsibilities

- **Collects & manages data** pertaining to NH hazardous waste generators; translated to EPA's RCRAInfo
- **Provides guidance on reporting requirements** for NH generators, transporters, etc.
- **Issues EPA numbers** for shipments of hazardous and NH regulated wastes
- **Issues registrations** to hazardous waste transporters that transport waste in the state
- **Collects fees** through Hazardous Waste Quarterly Reports



## Four Reports

- RCRA C Site Identification Form a.k.a. “Notification Form”
- Hazardous Waste Manifest
- Quarterly Activity Reports
- Biennial Reports



### RCRA C SITE ID Notification of Hazardous Waste Manifest

NHDES Waste Management Division

PO Box 95, Concord, NH 03301

(603) 271-2921 or <http://www.nhdes.state.nh.us>

Rule: Env-Hw 504.02(a), 505.01

<b>EPA ID No.</b> [REDACTED]	
1. Reason for Submittal and Effective Date	Enter effective date here [REDACTED] the [REDACTED] of [REDACTED] 20[REDACTED]. <input type="checkbox"/> To provide initial notification (for universal waste or used oil accumulation only). <i>please include the \$150 fee for initial notification information.</i> Reason: [REDACTED] <input type="checkbox"/> To provide subsequent notification (for universal waste or used oil accumulation only). Reason: [REDACTED]
2. Site Name	Company Name: [REDACTED]
3. Site Location Information	Street Address: [REDACTED] [REDACTED] City or Town: [REDACTED] County Name: [REDACTED]
4. Site Land Type	<input type="checkbox"/> Private <input type="checkbox"/> Federal
5. NAICS Code(s) (available at <a href="http://www.naics.com">www.naics.com</a> )	A. [REDACTED] C. [REDACTED]
6. Site Contact Person	First and Last Name: [REDACTED] Phone Number and Extension: [REDACTED]
7. Site Mailing Address	Street or P. O. Box: [REDACTED] City or Town: [REDACTED] State: [REDACTED]
8a. Legal Owner of the Site	Name of Site's Legal Owner: [REDACTED] Street or P. O. Box: [REDACTED] City or Town: [REDACTED]
(List additional owners in the [REDACTED])	

## Future plans: RIMS

- Translate manifest data from ~~Manifest~~ to the RIMS database instead of data entry
- Online payment system for generator fees





**Administrator**  
**Todd Piskovitz**



# Compliance Section

**Tod Leedberg**  
**Administrator**

**Tammy Calligandes**  
Inspection Program

**Tyler Croteau**  
Enforcement Program

**Andrew Gould**  
Used Oil Program

**Dawn Brule**  
Inspection Program

**Adam Tirrell**  
Inspection Program

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## Compliance Section

### → Inspection Program

- Prevents future hazardous waste sites and threats to human health and the environment.

### → Enforcement Program

- Ensures fair and consistent application of HW Rules through Administrative Fines and penalties.

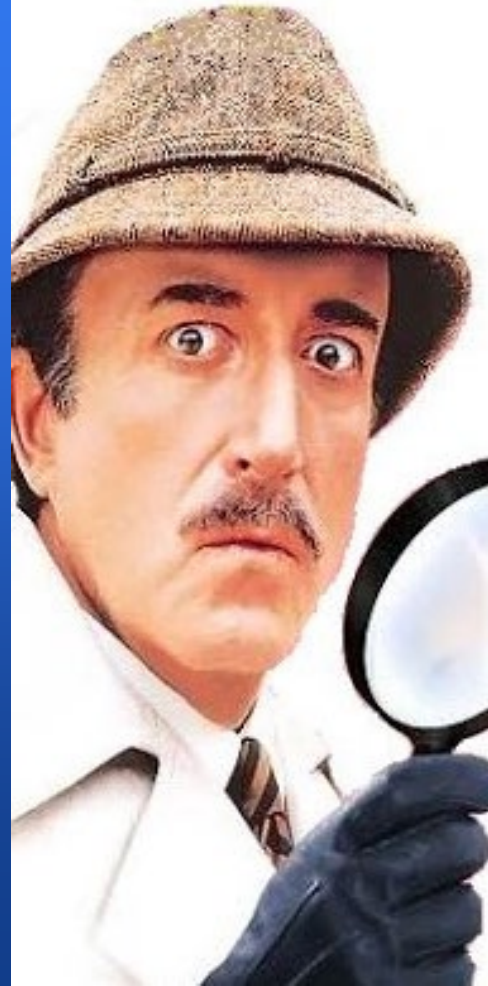
### → Used Oil Program

- Inspection, technical assistance, outreach to used oil facilities.



## Inspection Program

- Hazardous waste generators2,16 1 state-wide
  - Focus on FQGs
- Inspection Format
  - File Review
  - Facility Tour
  - Records Review
  - Exit Debrief
- Common violations – HW Training, HW determinations, manifests/reports, Contin. Plans
- Inspection Report – compliance status
- Educate generators





## FFY 2023 Inspection Plan

### 16 Large Quantity Generators

- ✓ 4 LQG Hospitals
- ✓ 4 new LQGs or those never inspected
- ✓ 8 not inspected in last 5 years

### 16 Others (non-LQGs)

- ✓ Facilities with 90-day storage extensions
- ✓ FQGs not previously inspected
- ✓ Referrals from SQG Program



## Enforcement Program

- Goals— Environmental Protection, Correction of Violations, Deterrence, level playing field.
- Class 1 or Class 2 violations
- Secondary Violator or Significant Non-Complier
- RoHWI, LOD, NOPV, Admin. Fine, RFE
- Administrative Fines – up to \$2,000/day
- Civil Actions – NH DOJ – up to \$50,000/day



## Used Oil Management Program

- Ensures proper management of and encourages recycling of Used Oil
- Used Oil is a HW yet regulated less stringently when recycled.
- Do-It-Yourselfers (DIY) and Businesses
- Generators, Transporters, Marketers, and Burners
- 1-888-TAKEOIL or [usedoil@des.nh.gov](mailto:usedoil@des.nh.gov)





**Administrator**  
**Todd Piskovitz**



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# Permitting Section

Section Supervisor: Julia Sunderlin

# Permitting Section

## Standard Permits (TSDFs)

- None in NH

## Transfer Facility Permits

- Currently one in NH
- May be more in development



# Permitting Section

## Limited Permits

- Treatment of HW by generators
- Wastewater treatment units (WWTU), evaporators or elementary neutralization units (ENU)

## Emergency Permits

- Treatment of HW when there is substantial or imminent endangerment to human health or environment
- Temporary – not to exceed 90 days



# Emergency Permits













## Limited Permits allow for treatment of waste streams to render them:

- Non-hazardous
- Safer for transporting
- Amenable to recovery
- Easier to store
- Reduced in volume

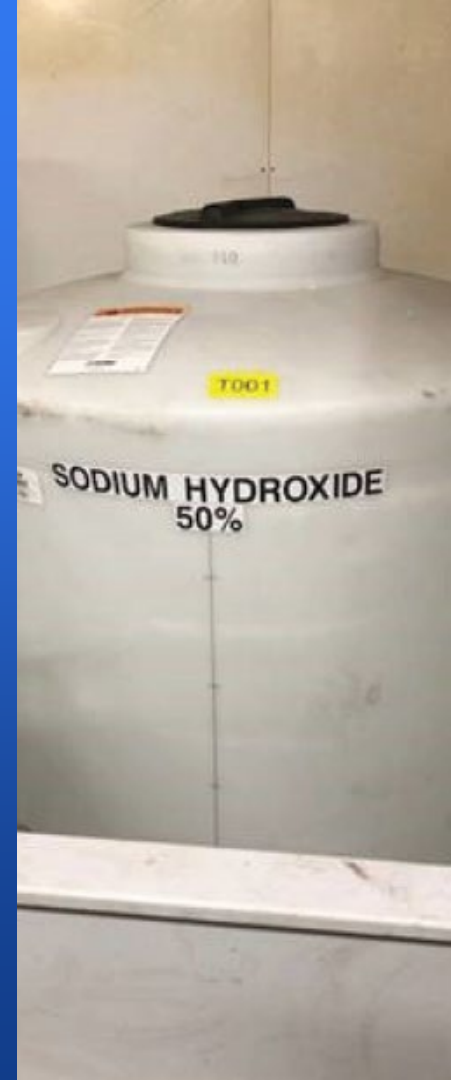


## LPs required for FQGs that have:

- Wastewater treatment unit;
- Evaporator; or
- Elementary neutralization unit

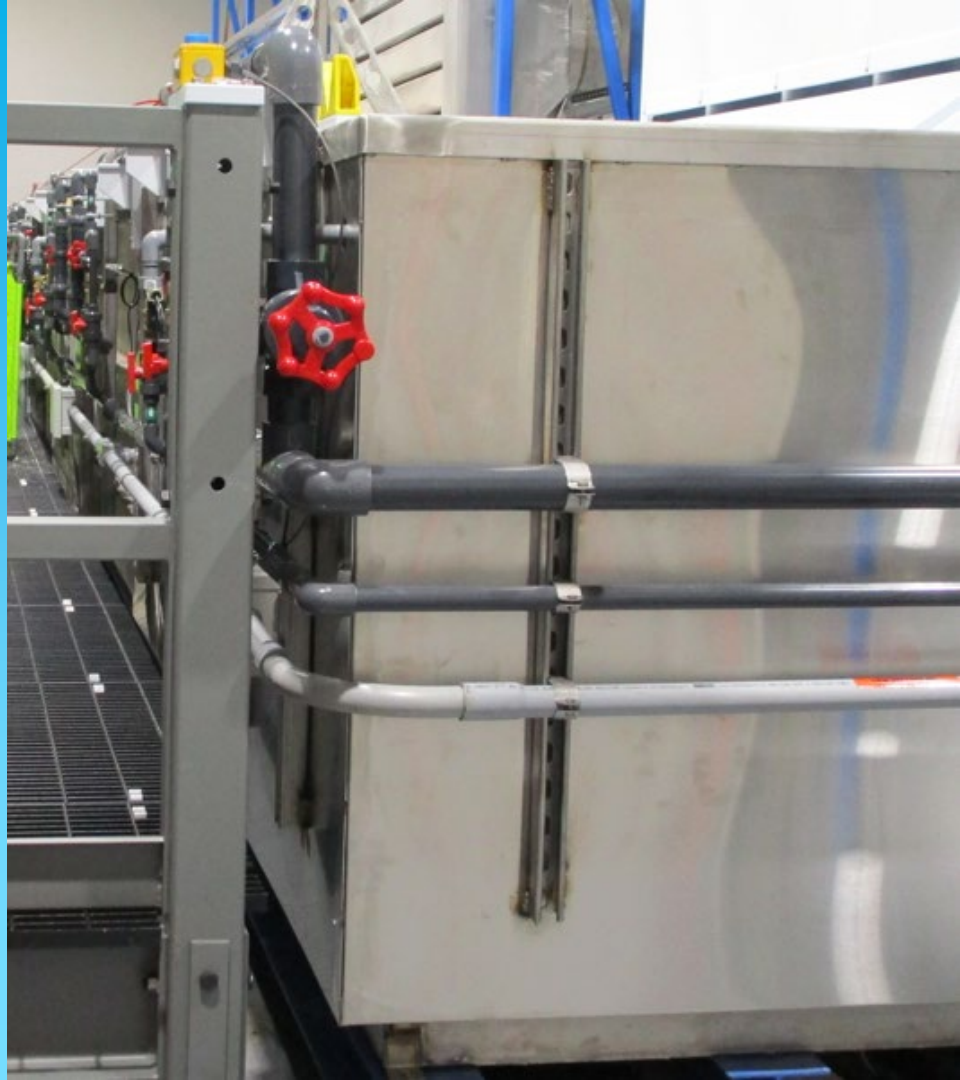
## That:

- Receives a hazardous waste stream; or
- Generates a hazardous waste



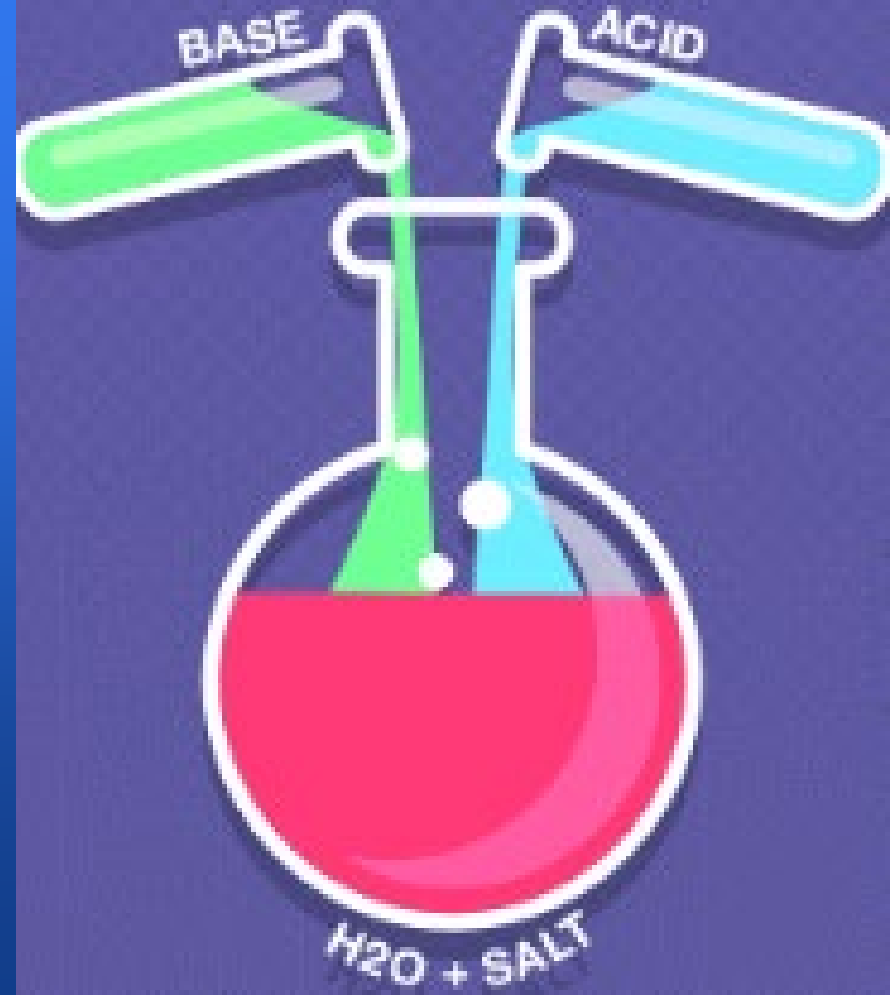
# Wastewater Treatment Units

- Remove hazardous constituents from process wastewaters
- May generate a hazardous sludge



## Elementary Neutralization Units

- Used to neutralize hazardous wastes that are hazardous ONLY because they exhibit the characteristic of corrosivity ( $\text{pH} \leq 2$  or  $\geq 12.5$ )



## Evaporators

- Reduce the volume of wastewaters, consolidate hazardous constituents by an evaporation/heat process, and may generate a hazardous sludge
- Require documentation of compliance with Air Resources Division standards



## Limited Permits:

### Term:

- Effective for 5 years

### Application Fee:

- \$750 for new
- \$400 for Renewal or Modification

### Modifications Required:

- For changes to the treatment unit; or
- Changes in the waste stream being treated





## Permitting Section – Remediation Waste

### In-situ Treatment

- Within AOC
- May avoid generation of HW
- Can save on disposal costs

### Ex-situ Treatment

- HW is generated
- May not be cheaper than managing as HW
- **Notify as a generator**

### Contained&Out

- Listed HW mixed with env.media to be managed as non hazardous
- Requires NHDES approval
- May have to notify as a generator



## Management of Remediation Hazardous Waste

- Env-Hw 507.02 Requirements of Containers & Tanks, Storage
- Env-Hw 509.02 Full Quantity Generator Requirements
  - (b) Emergency posting
  - (c) Security measures for outdoor accumulation
  - (d) Label requirements
  - (g) thru (i) Training
  - (j) Aisle space
- Env-Hw 512.01 Record Keeping
- Env-Hw 512.02 Quarterly Reporting
- Env-Hw 512.04 Biennial Reporting





# Improper Storage

Inadequate security measures for outdoor storage areas  
Env-Hw 509.02(c)

Unlabeled containers  
Env-Hw 509.02(d)

Does not meet container requirements  
Env-Hw 507.02

12/16/20



# Improved Storage

## 509.02(c) Requirements:

- Barrier
- Signage

## 509.02(d) Label Requirements:

- Accumulation start date
- Words "Hazardous Waste"
- Words identifying the contents
- EPA waste numbers

## 507.02 Requirements:

- Aisle space
- Covered
- Impervious surface



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## Consultants and the HWMB A Summary

The background of the slide is a photograph of the New Hampshire State Capitol building. It is a large, classical-style building with a prominent central dome topped with a golden orb. The facade features a portico with tall columns and a pediment. In front of the building, there is a statue of a man on a pedestal, surrounded by greenery and pink flowers. The sky is clear and blue.

## Authorization Section

- ✓ NH Rules vs. Federal Regulations

## Certification Section

- ✓ Training

## Reporting & Information Section

- ✓ Manifest, EPA Identification numbers

## Compliance Section

- ✓ Compliance Assistance

## Permitting Section

- ✓ Permits, Remediation projects



## HWMB Contacts



### Compliance

[Tod.G.Leedberg@des.nh.gov](mailto:Tod.G.Leedberg@des.nh.gov)

603.271.2946



### Certification

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603.271.2967



### Permitting

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603.271.5328



### RIMS

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### Authorization

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### Administrator

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603.271.1998

