

Northeast Waste Management Officials' Association (NEWMOA) Self- Audit

Prepared for the New England & New York
Environmental Commissioners

February 2014



Connecticut Maine Massachusetts New Hampshire New Jersey New York Rhode Island Island Vermont

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Northeast Waste Management Officials' Association (NEWMOA)

www.newmoa.org

Self-Audit for the Northeast Committee on the Environment (NECOE)

February 2014

Overview

The [Northeast Waste Management Officials' Association](http://www.newmoa.org) (NEWMOA) is a non-profit, non-partisan, 501(c)(3), interstate association that was established by the governors of the New England states as an official interstate regional organization, in accordance with Section 1005 of the federal Resource Conservation and Recovery Act (RCRA), to coordinate interstate hazardous and solid waste activities. The organization was formally recognized by the U.S. EPA in 1986. NEWMOA's membership is composed of the state environmental agency directors of the hazardous waste, solid waste, waste site cleanup, emergency response, pollution prevention and toxics, and underground storage tank programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

NEWMOA's mission is to develop, lead, and sustain an effective partnership of states that helps achieve a clean, healthy, and sustainable environment by exploring, developing, promoting, and implementing environmentally sound solutions for:

- Reducing materials use and preventing pollution and waste;
- Properly reusing and recycling discarded materials that have value;
- Safely managing solid and hazardous wastes; and
- Remediating contaminated sites.

NEWMOA is committed to ensuring that the generation of waste is minimized, that discarded materials are managed to reduce their environmental impacts, and that oil and hazardous materials that have been released to the environment are appropriately managed. The overall organizational goals are to:

- Improve the management of waste in the region, including advancing greater waste reduction, reuse, and recycling;
- Improve the capacity of state staff to implement waste management, pollution prevention, toxics reduction, and waste site clean-up programs and regulations;
- Promote interstate coordination on understanding and addressing priority issues;
- Facilitate development and implementation of regional approaches to solving critical environmental problems;
- Articulate state program views on federal rulemakings and other policy developments; and
- Facilitate communication and cooperation among member states, between the states and the U.S. EPA, and between the states and other stakeholders.

NEWMOA develops and supports forums that enable its members to share resources and lessons learned so they can benefit from each other's successes and experiences, thereby enhancing their programs. It also provides a venue for sharing different approaches and solutions to new challenges facing states. NEWMOA coordinates examination of common emerging

environmental challenges; recommends unified regional positions to federal and state policy makers; and develops and helps implement coordinated regional approaches and programs. The organization identifies and defines emerging issues, particularly those that are appropriate for regional cooperation and problem solving. NEWMOA does not engage in paid advocacy or lobbying activities.

NEWMOA's self-audit seeks to address a February 2013 request by the New England and New York Environmental Commissioners/Directors. This evaluation describes NEWMOA's services, governance structure and Board of Directors, finances, priorities, and programs.

Member Benefits

NEWMOA provides cost effective services that benefit its members, including:

- Coordination and staff support for examining common emerging environmental challenges and facilitating development of recommendations for unified regional positions;
- Involvement in regional initiatives to solve critical environmental problems related to solid and hazardous waste, toxics in the environment, and waste site cleanup;
- Support for regulatory program development and implementation;
- Analysis that transforms data into value-added and strategic information;
- Coordination on and development of support tools for gathering and aggregating data and measuring environmental performance;
- Communications and coordination with the regional and national offices of EPA to discuss current policy issues and environmental programs and to present state agency views;
- A forum for waste program managers and staff to collaborate and share technical and programmatic information with colleagues across the region;
- Research on cutting-edge waste management, waste site cleanup, toxics, and pollution prevention topics; and
- Training on technical, policy, and programmatic priorities.

NEWMOA has a distinguished history of efficiency and effectiveness in implementing projects and achieving results.

Services

For more than [25 years](#), NEWMOA's members have relied on the [Association to support their efforts to develop and implement regulatory and non-regulatory programs and to achieve their goals](#). NEWMOA provides the following core services to support all of its program areas and to help members be more efficient and effective. NEWMOA publishes a periodic e-newsletter, called [News @ NEWMOA](#), to keep its members, EPA colleagues, supporters, and others informed about its services and programs.

NEWMOA's staff and membership has [extensive expertise](#) in a number of subject areas related to solid waste, hazardous waste, waste site cleanup, pollution prevention and toxics reduction, sustainability, and innovation. Appendix A provides a profile of the staff's expertise and skills.



news @ NEWMOA

Fall 2013

www.newmoa.org

Welcome to news@NEWMOA

The Northeast Waste Management Officials' Association (NEWMOA) recently developed this periodic newsletter to help our members and colleagues keep informed about the Association's projects and activities. You are receiving this because you are a member of a NEWMOA Workgroup, Committee, Program, or networking group; a colleague at EPA or a related organization; or connected to NEWMOA in some other way. We hope that you like the e-delivery format, and we encourage you to [send us](#) your comments and suggestions so that we can make improvements. If you have questions about the Newsletter, contact [Lois Makina](#), (617) 367-8558 x312. Please share this newsletter with others in your agency or organization that might be interested.

Board of Directors

NEWMOA's [Board](#) met in September 2013 in Maine to establish the Association's budget and workplans for the upcoming year. The Board also heard updates from EPA and held a roundtable for state updates. This newsletter highlights many of the Board's 2014 priority projects and initiatives.

Hazardous Waste Program

New Pharmaceutical Waste Workgroup

NEWMOA recently formed a Pharmaceutical Waste Workgroup that involves hazardous waste, solid waste, and pollution prevention program staff from the Northeast states and EPA. The



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[Goodbye, Adam!](#)

Managing & Sharing Information

NEWMOA collects, analyzes, and shares information and data and helps members develop approaches and tools for program implementation, measurement, analysis, and evaluation. These services:

- Promote greater efficiency and avoid duplication of effort by individual states;
- Help state programs identify opportunities for regional cooperation;
- Promote consistency in data definitions and collection;
- Assist with program evaluations;
- Provide information and analysis for individual state program decision making and planning; and
- Help demonstrate progress toward strategic goals of the Association and its members.

Facilitating State & Federal Agency Interaction

From its inception, the Association has facilitated its members' interactions with federal agencies, particularly EPA. NEWMOA's members recognize that their ability to effectively advise EPA and other federal agencies is enhanced when they can find areas of consensus on key

regulatory and policy issues and present those views as a unified position. They rely on the Association to share their comments, viewpoints, and recommendations on national environmental issues and to help them learn from each other. When there is a uniquely regional perspective or concern regarding an environmental problem, the Association facilitates an effort to articulate that view and share it with appropriate national groups and agencies. NEWMOA develops these consensus positions in collaboration with the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) and other organizations, as appropriate, and communicates those positions to EPA and other federal agencies.

To develop members' comments on important national and regional issues, NEWMOA's workgroups often prepare letters for the Board to review and approve. The letters to federal agencies are carefully crafted to accurately reflect the views of NEWMOA's members and are signed by NEWMOA's Chair or Vice Chair. The result is a clear, concise, regional message that can be more powerful than letters from individual states. In some cases, individual states submit separate letters and comments based on their specific concerns, and, in such instances, NEWMOA's letter complements and augments the state submissions by addressing issues of common concerns among members. NEWMOA's Workgroups will often organize a series of conference calls so that state staff can share their draft letters and coordinate their responses.

In 2012, NEWMOA's Board developed guidance (available in Appendix D) that covers preparation of comments and letters regarding federal policy and regulatory proposals, as well as how the Board handles any potential disagreements among the members. All of NEWMOA's [comment letters](#) are available.

Providing Training & Assisting Staff

Maintaining the expertise and knowledge of professional staff and management is important to the delivery of effective environmental services and programs. NEWMOA provides a variety of training opportunities for member states to help them maintain their standards for Agency performance. Because many of the state waste management, waste site cleanup, pollution prevention, and toxics reduction programs face similar technical and programmatic issues, developing and delivering training to address these challenges can promote efficiency and avoid duplication of effort. NEWMOA also provides a forum for its members to learn from each other and improve their management, technical, and other professional skills.

Conducting Research

Conducting research on common issues and "best practice" options is essential to helping programs maximize their efficiency and effectiveness. NEWMOA prepares reports, fact sheets, analyses, presentations, and other research-based materials for its members and others. Researching priority topics is often more efficient when conducted regionally than when undertaken by individual state programs. NEWMOA has an EPA-approved 2011-2016 [Quality Management Plan](#) that covers information and data collection and analysis conducted by the Association. All of the Association's reports, newsletters, fact sheets, brochures, and other documents are available on its [website](#).

Procuring Resources

Procuring the necessary resources to implement its strategies is a critical function for the Association. NEWMOA seeks funding through grants from federal agencies, contracts with member states, grants from private foundations, and other private-sector sources. Individual member states have used NEWMOA's resources to assist with particular projects. In most cases, the results of the Association's projects for individual states are shared with and benefit the other members.

All of NEWMOA's core services are designed to help states implement their waste management, P2, priority chemicals, and waste site clean-up programs. Such support helps programs develop and maintain staff competency, ensures that they are aware of the regulatory requirements and management approaches of neighboring states for similar activities, and reduces duplication of effort on research and other activities. By coordinating their efforts through NEWMOA, its members gain greater efficiency and effectiveness in implementing their programs.

Social Media

Social media offers associations like NEWMOA a new and evolving range of opportunities. This media includes a wide spectrum of user-engaged content technologies. NEWMOA is interested in engaging with and using social media to facilitate professional networking, information sharing, and relationship building among its members and associated stakeholders. Social media is playing an increasing role in helping the Association to advance its mission and communicate with its membership and stakeholders. NEWMOA's Board has prepared a Social Media Policy and a Social Media Strategy (available upon request) that outline the Association's goals for using social media, highlight how it currently engages in social media to achieve these goals, explore future strategies, and describe staff and member involvement in social media sites sponsored by NEWMOA. Like many organizations, NEWMOA is experimenting with social media and will continually evaluate its utility and make adjustments and improvements.

NEWMOA's goals for using social media include:

- Create focused communication channels and online communities of practice to advance the communication strategies and overall mission of the Association;
- Convene communities of practice that share a common interest or area of expertise;
- Facilitate professional networking among members and with targeted sectors;
- Engage NEWMOA members and interested stakeholders in sharing content;
- Ensure that NEWMOA members and others have ready access to information about NEWMOA-sponsored groups and resources through a variety of forums;
- Encourage members and interested stakeholders to provide feedback and input on NEWMOA's activities and resources;
- Provide dynamic content and quick updates to targeted groups of people; and
- Provide channels to promote NEWMOA and its programs and resources.

As of 2013, NEWMOA has developed or been involved with the following social media endeavors:

- Established a [LinkedIn page](#) to promote NEWMOA publications, tools, and other resources and create a presence for NEWMOA in this rapidly expanding professional networking space;

- Encouraged NEWMOA staff to create their own LinkedIn pages to connect with and expand their own professional networks;
- Developed the [National Sustainable Lodging Network](#), an online professional social network of sustainable hospitality practitioners and information clearinghouse to support the work of this community;
- Launched the [Green Chemistry Connection](#), a professional social network of green chemistry practitioners from business, education, government, health care, and the nonprofit sector;
- Developing a zero waste professional social network that will provide forums for zero waste professionals to share information on program development and implementation and foster innovation in zero waste programs through the exchange of ideas in real time;
- Post P2 News using an [RSS feed](#);
- Publish a P2 & sustainability video feed on the P2Rx.org homepage; and
- Created a [YouTube channel](#) to share recorded webinars.

NEWMOA seeks to ensure a professional decorum on all of these social media-sponsored outlets.

Future Potential Strategic Priorities of NEWMOA's Leadership

NEWMOA looks forward to continuing to provide cost-effective and high-quality services and promoting its mission with a focus on innovation; hazardous and solid waste reduction, reuse, and recycling; regulatory program support; pollution prevention; proper cleanup of contaminated sites; and toxics reduction as keys to the future of a healthier and cleaner region. NEWMOA's Board evaluates and updates the Association's Strategic Plan every five years. Appendix C describes NEWMOA's current strategic priorities, projects, and workgroups, which are also described in its 2013-2017 [Strategic Plan](#). During its regular quarterly meetings, the Board adjusts NEWMOA's operations in response to changes in funding, state priorities, EPA policies and rules, and other conditions. NEWMOA staff develops annual workplans and grant proposals based on NEWMOA's Strategic Plan and Board decisions, and program area chairs provide regular progress reports at every Board meeting. NEWMOA's steering committees and workgroups help the staff continually reevaluate the Association's priorities and make recommendations for Board consideration.

NEWMOA designs its annual programmatic priorities and activities to address key challenges and issues in its program areas. NEWMOA staff routinely investigates options for new areas of activities. NEWMOA's various groups diligently ensure that they focus on the directions established by the waste and pollution prevention directors, that their agendas are set to address priorities, that they consider emerging issues in developing workplans, and that there are opportunities for interaction among the members and with EPA in developing strategies and projects.

NEWMOA's Board is interested in building on the Association's successful initiatives establishing information clearinghouses and online data sharing systems to support state programs (see Appendices E and F, pages 61-67). In particular, in an era of e-enterprise transformation, NEWMOA has demonstrated a capacity to develop and manage systems for data collection, management, and analysis that enhance state programs' efficiencies and address information needs. This is a major strategic opportunity that the Association would like to

explore with the Committee on the Environment and is a theme throughout the following list of potential future strategic directions for NEWMOA's program areas.



Hazardous Waste

- Serve as a central repository or clearinghouse in the region for hazardous waste manifests;
- Support state efforts to address effective regulation of pharmaceutical waste and implement innovative programs; and
- Assist states with coordinating on the regulation of evaporators and zero-discharge units.



Sustainable Materials Management & Solid Waste

- Convene a regional meeting of environmental agencies to review results of states' transforming solid waste management efforts, discuss the status of efforts focused on capturing the value of waste materials, and identify common ground on next steps;
- Convene annual meetings of state solid waste program managers and staff to discuss priority issues and challenges;
- Support regional coordination on implementation of product stewardship laws;
- Develop approaches and promote best management practices for anaerobic digestion facilities to help inform states' regulatory approaches;
- Advance efforts to coordinate data sharing and analysis, move together toward more electronic data collection and management systems, and identify opportunities for regionalization of these functions;
- Promote increased recycling at commercial and institutional facilities, particularly for easy-to-recycle materials, such as paper; and
- Expand NEWMOA's Beneficial Use Determinations (BUD) database by adding information on states' BUD criteria and approaches and additional BUDs from participating states and create an easily searchable public version that covers some of the data in the database to encourage proper use of BUDs.



Waste Site Cleanup & Brownfields

- Expand NEWMOA's offering of training workshops to cover more topics and to serve a wider geographic area with more events;
- Assist states' efforts to address PCBs at waste sites, including the historic use of PCBs in building products;
- Support states in addressing climate resiliency in waste site cleanup programs;
- Leverage state and federal efforts to support a regional initiative to promote renewable energy on waste sites;

- Support state efforts to develop and implement policies and programs for management of mildly contaminated soils; and
- Conduct outreach and training to identify practical approaches to implementing greener remediation.



Pollution Prevention & Sustainability

- Identify priority industrial, business, and institutional sectors and create forums for regional information sharing and new outreach programs;
- Expand support for state efforts to recognize and reward sustainability initiatives in priority sectors;
- Develop coordinated strategies for developing tools to promote and inform the implementation of P2 and sustainable practices and technologies;
- Support improvements and upgrades in the systems for gathering, managing, and analyzing the results of initiatives to prevent pollution; and
- Develop and publish online calculator tools to assess the environmental and financial benefits of sustainability and pollution prevention efforts targeting specific sectors.



Priority Chemicals

- Develop a harmonized system for collecting and managing manufacturers' data on chemical use in products;
- Develop an online system for sharing data from product testing for high priority chemicals conducted by state agencies; and
- Develop an online system for sharing alternatives assessments.



Sustainable Compliance Strategies & Results

- Support state efforts to develop and implement sustainable compliance monitoring strategies and associated performance measurement; and
- Conduct regional pilot projects to test and learn about a variety of compliance monitoring strategies, including Environmental Results Programs (ERPs).

Lean & Program Efficiency

- Support forums for state programs to share information on their Lean and program efficiency initiatives.

NEWMOA's efforts to address many of these opportunities would require additional funding.

Organizational Challenges

The major challenge facing NEWMOA is the need for more diverse sources of funding. Traditionally, NEWMOA has relied on funding from EPA, particularly funding for innovative and prevention-oriented projects. However, the availability of this EPA funding has dramatically declined in recent years. Unlike NEWMOA's sister water and air interstate organizations, NEIWPC and NESCAUM, most of NEWMOA's program areas – solid waste, pollution prevention, waste site cleanup, and toxics reduction – are not based on federally-delegated programs and receive relatively little federal funding. In addition, EPA's RCRA hazardous waste funds that support state programs have been shrinking steadily for the past ten or so years. To address this challenge, NEWMOA has worked to diversify its funding sources, but this is a slow process, and the Association has had difficulty finding sources that are interested in supporting the kinds of interstate coordination and collaboration on waste issues that are at the heart of the organization's mission.

Governance

NEWMOA's [by-laws](#) prescribe the Association's membership, decision-making structure, and functions. The Association's Board reviewed, updated, and approved the current by-laws in 2011.

According to NEWMOA's by-laws, "State membership shall be composed of solid waste management program personnel with representatives from the member states, each of whom will be a director of NEWMOA. The directors of the solid waste management programs in the member state, where responsibility for administering solid waste management programs is not assigned to a single person, shall each serve as a member of the Board of Directors of NEWMOA. In states having a single director responsible for administering solid waste management programs, that individual shall serve as the member state's single member of NEWMOA's Board of Directors. Each of these member representatives shall be directors of the Corporation for all purposes set forth herein. In addition, a program director shall have the right to designate a representative to be a member of the NEWMOA Board of Directors in his or her place."

The by-laws define the term *solid waste management program* to mean "those programs that provide individuals employed by a state with responsibility for the regulation or management of "solid waste," "hazardous waste," "leaking underground storage tanks," "recovered materials," and "resource recovery" as those terms are defined by the Resource Conservation and Recovery Act, 42 USC, Section 6901 et. seq.; recycling and waste minimization activities under the Comprehensive Environmental Response, Compensation and Liability Act, 42 USC Section 9601 et. seq.; and state remediation acts intended to clean up non-designated CERCLA sites within the respective states. The term also applies to those programs created by member states for the purpose of promoting cross-media pollution prevention or toxics use reduction. The terms "solid waste" and "solid waste management" refer to the issues, problems, or activities that concern the above-described programs." (NEWMOA by-laws, page 2)

The NEWMOA [Board of Directors](#) establishes the budget, policies, and programs of the Association. The 2014 Board Members are:

- Yvonne Bolton, CT DEEP
- Robert Kaliszewski, CT DEEP
- Melanie Loyzim, ME DEP (2014 Treasurer)
- Sarah Weinstein, MassDEP
- Ben Erickson, MassDEP
- Jay Naparstek, Mass DEP
- Rich Bizzozero, MA OTA
- Michael Wimsatt, NH DES
- Stephanie D'Agostino, NH DES
- MaryJo Aiello, NJ DEP
- Michael DiGiore, NJ DEP
- Anthony Fontana, NJ DEP
- Thomas Cozzi, NJ DEP
- Peter Pettit, NYS DEC (2014 Vice Chair)
- John Vana, NYS DEC
- Ron Gagnon, RI DEM
- Leo Hellested, RI DEM
- George Desch, VT DEC
- Gary Gulka, VT DEC (2014 Chair)

NEWMOA operates on the federal fiscal year: October 1 through September 30. Its officers include a Chairman, Vice Chairman, and Treasurer. Unless otherwise agreed to during a meeting, the officers assume office on October 1st of each year. The order of rotation of the office of the Chairman is alphabetical, by state. For 2014, George Desch, VT DEC is the NEWMOA Chair; Peter Pettit, NYS DEC is the Vice Chair, and Melanie Loyzim, ME DEP is the Treasurer. NEWMOA's Executive Director is a non-voting member of the Board.

The Chairman's responsibilities include:

- Presiding at all meetings of the Board;
- Participating in the formulation and implementation of the policies set by the Board;
- Supervising the Executive Director;
- Regularly reporting to the Board; and
- Performing other duties the Board may assign.

The Vice-Chairman assumes the role of the Chair in his or her absence. The Treasurer ensures that NEWMOA keeps proper documentation of accounts, which are available at all times for inspection by any Board member. At each regular meeting of the Board, the Treasurer presents a written report of NEWMOA's financial condition.

The Chair, Vice Chair, and Treasurer make up the Board's Executive Committee. This Committee convenes at least once before every Board meeting to plan the meeting agenda and to discuss the organization's fiscal and policy matters.

NEWMOA's Finance Committee is chaired by the Treasurer and consists of two or three members selected by the Board of Directors from the Board. The Finance Committee assists the

Board in fulfilling its responsibility for oversight of the quality and integrity of the accounting and reporting practices of NEWMOA, and such other duties as directed by the Board. The Committee oversees NEWMOA's accounting and financial reporting processes, audits of the financial statements, the qualifications of the public accounting firm engaged as an independent auditor, and the performance of the independent auditor.

NEWMOA's Executive Director is also the Association's President (responsible for its day-to-day operations) and Clerk (responsible for being present at and keeping minutes for all Board meetings).

NEWMOA maintains an online [operational chart](#) that visually shows the organization's structure and relationship of the Board, committees, and working groups.

NEWMOA's Board and staff prepare an [Annual Report](#) that summarizes its activities for the prior year. The Report is distributed to the state environmental commissioners and directors, members of Congress who represent the northeast states, members of NEWMOA's workgroups and committees, EPA Headquarters and Regional managers and staff, present and past Board members, related organizations and agencies, and others.

Decision Making

NEWMOA's Board traditionally meets quarterly: in person three times per year in March, June, and September for one and a half days and via webinar for one day in December. The Board also meets by conference call or webinar on an as-needed basis. The September meeting is the Board's Annual Meeting where they make decisions about the upcoming fiscal year priorities, workplans, and budget. The notes and handouts from all of NEWMOA's Board meetings are posted on a members-only area of NEWMOA's website and available upon request.

A quorum of the Board for voting purposes consists of the waste program directors appointed by five of the eight member states. In order to carry out any motion presented for vote, a majority of those directors present and voting at a meeting must vote in the affirmative. Each member state has one vote. Section IV of NEWMOA's by-laws describes in detail the procedures for voting when a waste director is unable to participate in a meeting.

Financial Framework

For more than 25 years, NEWMOA has had an outstanding history of managing grants, contracts, and other funding sources. As a 501(c) (3) not-for-profit organization, NEWMOA has the authority to accept federal, state, and other funding. The Association consistently meets federal grant reporting requirements, submitting final reports on time and complying with all local, state, and federal laws. NEWMOA employs a part-time contract bookkeeper and undergoes an annual financial audit in accordance with OMB Circular A-133 by a certified public accountant, as required by the Board and grant regulations. The auditing firm is [Sandberg and Creeden, P.C.](#) NEWMOA's internal controls are rigorously tested during the course of their review. Since its inception, the Association has received excellent results with no adverse findings. The Board of Directors reviews and approves the annual audit, and copies are available upon request. NEWMOA prepares an [IRS 990 form](#) each year that provides a detailed public presentation of the Association's finances and income sources. In addition, EPA and the U.S.

Department of Agriculture (USDA) have conducted compliance audits over the past ten years with no major adverse findings.

NEWMOA is required to annually negotiate an indirect cost rate with the Department of the Interior. NEWMOA's rate calculation is conducted in accordance with OMB Circular A-87, which describes the cost principles that NEWMOA must follow. NEWMOA's 2013 indirect cost rate is 60.9 percent of salaries.

Dues

NEWMOA's members must contribute annual dues. Since 1991, the New England states have agreed to have their dues awarded directly to NEWMOA in the form of a grant from EPA Region 1. The source of these funds is the regional RCRA allocation. Currently, this funding is approximately \$138,000 per year, which is lower than in previous years. Annually, NEWMOA submits a proposal to EPA Region 1 that outlines support for priority hazardous and solid waste projects as well as support for Board of Directors meetings and other activities. Since they joined NEWMOA, New Jersey and New York have elected to directly pay their annual dues of \$15,000. For fiscal year (FY) 2013, these dues constitute approximately 18 percent of the Association's budget.

NEWMOA has also formed two clearinghouses that address issues related to chemicals of concern and include member states that are outside of the northeast: the [Interstate Mercury Education Reduction Clearinghouse](#) (IMERC) and the [Interstate Chemicals Clearinghouse](#) (IC2). IMERC and IC2 have established dues structures for their members.

NEWMOA formed IMERC in 2001 to support a regional initiative of the New England governors and Eastern Canadian Premiers, who formally adopted a [goal](#) of "virtual elimination of the discharge of anthropogenic mercury into the environment, which is required to ensure that serious or irreversible damage attributable to these sources is not inflicted upon human health and the environment." The Governors adopted a Mercury Action Plan to help achieve this goal, which included among many activities the formation of a clearinghouse that would support state mercury product and waste reduction activities. IMERC provides technical and programmatic assistance to states that have enacted provisions similar to the [Mercury Education and Reduction Model Act](#), which was developed by NEWMOA from 1998-2000. IMERC also provides a single point of contact for industry and the public for information on mercury-containing products and member states' programs. Currently, there are 15 members of IMERC: California, Connecticut, Illinois, Louisiana, Maine, Massachusetts, Michigan, Minnesota, New Hampshire, New Jersey, New York, North Carolina, Rhode Island, Vermont, and Washington State. IMERC's annual [dues](#) are differentiated based on whether the state is a member of NEWMOA or not. NEWMOA's members pay \$5,000 per year and non-members pay \$10,000 per year (see pages 47-49 for more information on IMERC).

NEWMOA's leadership of the toxics reduction programs in the northeast and effective management of IMERC led a group of states to approach the Association in 2009 to help them form an Interstate Chemicals Clearinghouse (IC2). They thought that NEWMOA's programmatic and technical expertise would be valuable in helping them to coordinate their efforts to address other priority chemicals in products and waste. After two years of planning,

NEWMOA launched the IC2 in 2011 as a “partnership of state, local, and tribal agencies that promotes a clean environment, healthy communities, and a vital economy through the development and use of safer chemicals and products.” The IC2’s dues structure for [members](#) is complex and based on population. IC2 also welcomes local government and tribal entities as members. IC2’s members are:

- California Environmental Protection Agency
- Connecticut Department of Environmental Protection
- Delaware Division of Public Health
- Maine Department of Environmental Protection
- Massachusetts Department of Environmental Protection
- Metro (Portland, OR)
- Michigan Department of Natural Resources and Environment
- Minnesota Pollution Control Agency
- New York Department of Environmental Conservation
- Oregon Department of Environmental Quality
- Vermont Department of Environmental Conservation
- Washington Department of Ecology

The Clearinghouse has a [Supporting Member](#) category to encourage participation by companies, non-governmental organizations, institutes, and others. The Supporting Membership dues structure is based on the type and size of the organization or business. IC2’s Supporting Members include:

- Californians for a Healthy & Green Economy (CHANGE)
- Citizens’ Environmental Coalition
- Clean and Healthy NY
- Clean Production Action
- Clean Water Fund
- Healthy Schools Network
- Institute for Agriculture and Trade Policy
- Lowell Center for Sustainable Production
- Maureen Gorsen
- Office Depot
- Oregon Environmental Council
- UCLA Sustainable Technology & Policy Program
- UConn Health Center, Chemical Innovations Institute
- Walmart

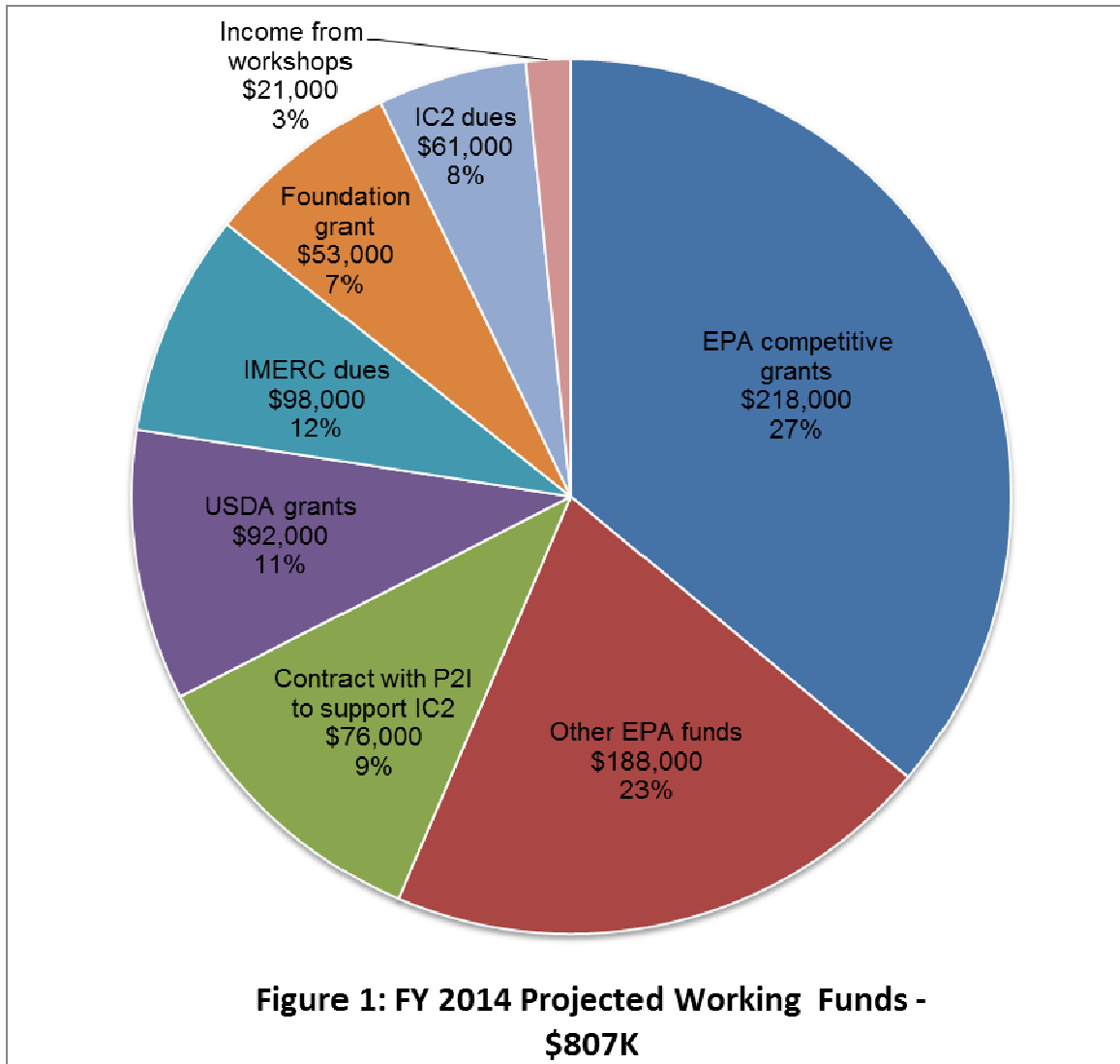
See pages 49-53 for more information on the IC2.

Budget

Each year at its Annual Meeting, NEWMOA’s Board reviews and decides on a proposed budget for the upcoming fiscal year. At every Board meeting, the group reviews and discusses NEWMOA’s year-to-date estimated spending and the status of spending against the budget.

For FY 2014, NEWMOA’s budget is \$770,000, which is funded by six grants and contracts plus dues. The following is a breakdown of NEWMOA’s basic budget categories for FY 2014:

- Personnel: \$520K (5.7 FTEs)



- Travel and Meeting: \$55K
- Contracts: \$15K
- Operating Expenses: \$180K

This budget funds an Executive Director, three Project Managers, a Project Coordinator, interns, and one Administrative Assistant. NEWMOA routinely funds the travel of state managers and staff that request support in order to participate in its meetings and other events.

Figure 1 presents NEWMOA’s projected working funding sources for FY 2014. NEWMOA has a “fund balance” or “rainy day fund” of approximately \$340,000 that is held in reserve to address emergencies and funding shortfalls. These funds come from discretionary sources of funding, and NEWMOA’s Board can decide on the use of these funds.

Table 1

Northeast Waste Management Officials' Association (NEWMOA)
Audited Statement of Financial Activity
Fiscal Year 2012

FY 2012 Revenues		\$ 969,927**
<u>Expenditures by Category</u>		<u>% of Expenditure</u>
Staffing (6.7 FTE)	\$ 547,344	59.22%
Contractual/Professional	203,894	22.05
Supplies & Equipment	16,398	1.77
Travel & Meetings	44,805	4.85
Computer Support & Communications	18,476	2.00
Occupancy	57,492	6.22
Program Support	6,723	0.73
In-Kind Services (States)	9,475	1.03
Indirect Expenses	<u>19,736</u>	<u>2.14</u>
Total Expenditures	\$ 924,298	100.00 %
Surplus of Revenues over Expenditures	\$ 45,629**	

** Inclusive of \$65,000 private grant received in FY 2012 that is restricted for FY 2013-2014 use.

Table 1 presents a summary of NEWMOA's FY 2012 audited expenses. NEWMOA's unaudited expenses in 2013 were approximately \$790,000. NEWMOA's annual total expenses since 2007 were:

- FY 2007: \$1.20 million
- FY 2008: \$1.055 million
- FY 2009: \$1.056 million
- FY 2010: \$1.06 million
- FY 2011: \$1.16 million
- FY 2012: \$970 thousand
- FY 2013: \$790 thousand (unaudited)

In 2007, NEWMOA supported ten staff people; from 2008 through 2009 there were nine staff; in 2010 there were eight staff, and from 2011 through 2012 there were seven. In 2009-2012, NEWMOA managed several large contracts that involved procurement of contractor support.

As a 501(c)(3) non-profit organization, NEWMOA has the authority to accept federal, state, and other funds. Currently, NEWMOA's sources of funding include EPA grants, other federal grants, state contracts, dues, private foundations, and workshop fees. EPA funding opportunities for the program areas that NEWMOA supports have declined in recent years. To respond to this trend, in 2012 the NEWMOA Board developed a policy that enables the Association to apply for grants from private foundations. This policy is available upon request. In 2012, NEWMOA received its first foundation grant. NEWMOA is currently exploring opportunities to leverage some of the

software and other tools it has developed and to offer support and training services to its members and other governmental entities for a fee to assist them with implementation and upgrades.

NEWMOA will have a final audited report on its expenses for 2013 completed in March 2014. It will be available upon request.

In 2013, NEWMOA negotiated a 3-year lease extension at a below-market rate of \$22-24/square foot for the office located at 129 Portland Street, Suite 602, Boston, MA. The Board has decided that in FY 2015 NEWMOA will investigate moving the office to a less expensive area of Boston. The Board would like any new office location to be accessible by public transportation.

NEWMOA Staff

NEWMOA currently has seven talented and capable [employees](#) including management, administrative, technical, and project staff covering the following job categories:

- Executive Director (1 person)
- Project Manager (3 people)
- Project Coordinator (1 person)
- Administrative Assistant (1 person)
- Intern (1 person)

Most of the current NEWMOA employees have been employed by the Association for five or more years. Staff resumes are available upon request. NEWMOA also has a contract bookkeeper who works approximately one day per week. NEWMOA's regular work week is Monday through Friday and totals 37.5 hours.

NEWMOA's job descriptions and "Employee Handbook" are available upon request. The Handbook describes employee benefits, policies, practices, and guidance. NEWMOA's Board and a qualified attorney, who specializes in employment law, review this Handbook periodically to ensure that it remains current with federal and Massachusetts law and employment practices in comparable organizations. The Executive Director conducts annual performance reviews of employees and reviews and discusses their job descriptions at that time.

All full-time employees are eligible to participate in a comprehensive group insurance program. This program consists of medical, dental, long-term disability, and life insurance. NEWMOA's benefits plan also allows employees to make pre-tax contributions for health care premiums and costs, dependent care, and commuting expenses.

Salaries and benefits for NEWMOA employees are established by the Board of Directors every year during their Annual Meeting. To prepare for the Meeting, NEWMOA's Executive Director reviews the budget and recent compensation adjustments for Massachusetts state employees, as well as those in other northeast states, and survey results for compensation of comparable job categories for other non-profits. She presents the results of this research and prepares a proposal for the Board to consider. The Board reviews this proposal and makes its decisions based on the organization's financial status and other considerations. The Board negotiates a contract with the Executive Director every two years.

Financial Management

As a small, adaptable, and flexible organization, NEWMOA manages its annual budget based on funds received and works within those limitations. NEWMOA's staff resources are based on available funding. The Association is committed to continually improving its budget process with an emphasis on both efficiency and high-quality deliverables and products.

NEWMOA's annual dues have remained at the current levels for more than 20 years, even though basic Association operational expenses have increased over this period of time. In recognition of the fiscal situation of members, NEWMOA has also not raised its meeting fees for members. In December 2013, the NEWMOA Board decided to raise the fees for its waste site cleanup workshops.

NEWMOA's management routinely reviews costs associated with the organization's operations to find savings. For example, in FY 2012, the organization examined its insurance providers for dental, life, and disability and its office and other insurance and was able to save over \$10,000 per year by switching to new plans and consolidating plans under a single provider. Every year the Association evaluates options for health insurance and makes adjustments to keep the increases in these costs as low as possible.

In FY 2014, NEWMOA transitioned to using a no-cost service for conference calls, which should result in a savings of several thousands of dollars per year. The Association is currently examining various information technology options for potential cost savings, to address problems with aging equipment, and to improve these services. NEWMOA takes advantage of low-cost software packages that are available to non-profit tax-exempt organizations through various providers.

In FY 2008, NEWMOA's Board transitioned from four to three in-person day-and-a-half meetings per year (in September, March, and June) and a one-day webinar (in December). They did this to reduce travel costs for their agencies and NEWMOA's meeting costs.

NEWMOA has implemented green meeting practices to reduce its environmental footprint and costs. The Association has made significant progress toward being a paperless operation. In particular, NEWMOA transitioned most of its meetings and workshops to paperless events in 2007, which resulted in significant cost and paper savings. NEWMOA staff has a small green team that periodically evaluates the office operations for additional savings and environmental footprint improvements.

Operational & Programmatic Alternatives

NEWMOA regularly meets with NEIWPC and NESCAUM to coordinate on cross-media topics, such as climate change, mercury, underground storage tanks, enforcement, pharmaceutical waste, and emergency response. On the issues where these organizations have overlapping interests, NEWMOA has collaborated with them to plan meetings, conferences, and other events. For example, in 2012 NEWMOA held its annual Brownfields Program meeting in collaboration with NEIWPC's Underground Storage Tank (UST) Program to facilitate a discussion about how states can better coordinate the resources available to USTs and brownfields programs to redevelop contaminated properties. Another example was the close

coordination of the three interstates on planning conferences on mercury issues from 1996-2009. The three groups also prepared a [Report](#) on the results of the northeast states' mercury reduction efforts in 2007. The Report captured the results of the implementation of the Governors' Mercury Action Plan and Mercury Task Force initiatives.

NEWMOA is collaborating with NEIWPC, NESCAUM, the New England Environmental Commissioners, and the U.S. EPA Region 1 on the development and implementation of the [Ira Leighton "In Service to States"](#) Environmental Merit Award. The new Award will recognize an individual or organization that has made significant strides in facilitating state and federal partnerships through innovative sustainable solutions addressing critical environmental challenges in New England.

NEWMOA also collaborates with the [Northeast Recycling Council](#) (NERC) and the [Product Stewardship Institute](#) (PSI). These groups are based in the northeast, involve the staff of NEWMOA's members, and focus on solid waste management issues. Their memberships comprise a variety of stakeholders, such as recyclers, manufacturers, trade organizations, local government, and non-governmental organizations, in addition to state programs. They were founded to advocate for recycling and product stewardship, respectively. NEWMOA's staff communicates with NERC and PSI on topics of mutual interest and attends their conferences and meetings, when appropriate. In 2013, NEWMOA's Board endorsed a reciprocity agreement with PSI that focuses on reinforcing and expanding opportunities for the groups to share information and collaborate. NEWMOA recently partnered with PSI on a proposal to support CT DEEP's product stewardship initiatives.

In the spring of 2013, NEWMOA investigated moving its offices to share NESCAUM's office space. However, at that time NESCAUM did not have adequate space available to accommodate NEWMOA's needs. NEWMOA investigated moving into the building where NESCAUM is located because the management has dedicated the building to supporting non-profit organizations. However, the building was fully occupied, and there was no office space available that met NEWMOA's needs. NEWMOA has explored sharing IT and other services with NEIWPC and NESCAUM, but those organizations do not have any unused capacity that could help NEWMOA with its IT needs.

NEWMOA is open to new ideas for coordinating with related organizations to make operational improvements and address priority regional environmental issues.

Programs

NEWMOA's original focus in the mid-1980s was on supporting state implementation of the relatively new Resource Conservation and Recovery Act (RCRA) hazardous waste and solid waste law and programs. To address the waste management hierarchy and the growing complexity of waste issues since that time, NEWMOA has adapted and evolved. While hazardous and solid waste management remain a core focus, substantial attention and resources are now targeted toward pollution prevention, toxics reduction, brownfields redevelopment, sustainable materials management, cleanup of contaminated sites, and disaster debris management, among other concerns.

NEWMOA's Board of Directors developed an updated [Strategic Plan](#) in 2012 to inform its annual planning, fundraising, and budget process over the subsequent five years. NEWMOA's committees and workgroups implement this Plan through their annual workplans, which are reviewed and approved by the NEWMOA Board by October 1 of each year. For high-priority projects, NEWMOA's workgroups develop grant proposals and project plans that describe the problem the project is designed to address, project goals and objectives, tasks, a timeline, deliverables, and outputs. Some of the information for this audit was based on NEWMOA's 2013-2017 Strategic Plan.

NEWMOA's members recognize that many pollutants and wastes do not respect jurisdictional boundaries, and solving the problems associated with them requires cooperation among neighboring states. Furthermore, solutions to environmental issues often rely on the participation of business, environmental organizations, and other stakeholders that operate regionally. Markets for recycled materials and for recycling and other waste management services are regional, and states depend on each other for them. For example, NEWMOA has analyzed the amounts and interstate flow of various waste streams that are destined for disposal to better understand where and how these materials are managed. These studies have found a high degree of interdependence, making the region a "waste-shed." This information has fortified the Association's commitment to coordinating state waste management and pollution prevention efforts so that states can address their mutual interests and capacity needs and gain greater efficiency and effectiveness in addressing environmental challenges.

NEWMOA has organized its activities into the following Program Areas:

- Hazardous waste (see pages 26-28 for a description of priorities and activities);
- Sustainable materials management and solid waste (see pages 28-35);
- Waste site cleanup and brownfields (see pages 35-37);
- Pollution prevention and sustainability (see pages 38-45);
- Priority chemicals (see pages 45-53); and
- Cross program initiatives (see pages 53-57).

For each of these program areas there are critical issues that can be addressed through regional coordination. However, there are also a number of challenges facing NEWMOA's members across all of their programs, including:

- Reductions in federal and state budgets;
- Rapid changes in waste streams and increasing public concern about hazardous chemicals in products that can affect waste streams;
- An aging workforce in state environmental agencies and associated loss of institutional capacity as long-time staff retire;
- Increasing complexity of regulations and programs; and
- Emerging environmental issues that affect multiple environmental media and which may not be effectively addressed by traditional approaches to environmental regulation.

State environmental programs have experienced significant budget reductions over the last decade. These cuts have substantially affected their ability to implement programs. With deeper cuts expected in the future, state agencies will rely even more on NEWMOA to help to maintain their proficiency and effectiveness.

Much of the environmental agencies' workforce is rapidly approaching retirement. Hiring freezes and budget cuts have resulted in few new staff being hired and trained. Waste programs address complex technical issues and implement complicated regulations, which requires that the staff that manage and implement these programs have specialized competencies. All of the Northeast states face a significant challenge in the next ten years to ensure that program staff has the necessary skills and training.

The hazardous and solid waste and waste site cleanup programs started in the 1970s and 1980s have largely matured. Their wealth of regulatory interpretation and histories are critical to successful program implementation but can also make it difficult to adapt to new circumstances and environmental challenges. In some cases, the current rules and program structures were not designed to address the kinds of problems facing environmental agencies today. For example, federal and state hazardous waste regulations, which were developed to control wastes from larger manufacturing operations, present obstacles to establishing local programs for collecting unneeded pharmaceuticals from residences, even though the public safety benefits of removing these medications from homes are undisputed. Similarly, small businesses, commercial and institutional facilities, households, and the service sector all face new and more diffuse environmental challenges that were not anticipated when the major programs were developed. These types of pollution sources require a more robust and flexible array of approaches that use a combination of regulatory tools and education, incentives, and assistance to encourage environmental stewardship.

Now more than ever, NEWMOA's members need its services to address these challenges.

Program Area Steering Committees

NEWMOA has established Program Area Steering Committees that are chaired by a Board member, called the Program Area Chair and perform the following tasks under each Program Area:

- Help shape NEWMOA's multi-year strategic plans;
- Develop annual workplans;
- Oversee program area projects and activities;
- Share information on state and EPA policies and program;
- Develop ideas and strategies to address emerging issues;
- Form working groups; and
- Prepare comments on federal policies.

Each Program Area Chair regularly reports to the full Board. NEWMOA staff regularly coordinates with the Board and Steering Committees to discuss program priorities and direction, changes to existing program objectives, and potential improvements to NEWMOA's organizational structure and individual positions.

Under each program area, NEWMOA supports workgroups that implement projects and activities. NEWMOA's [operational chart](#) illustrates the relationship among NEWMOA's governance structure, Steering Committees, and workgroups. Appendix C (see pages 26-57) provides a detailed description of NEWMOA's priorities and work under each of its program areas.

Appendix A Core Competencies of NEWMOA Staff

NEWMOA's staff has [extensive expertise](#) in a number of subject areas related to solid waste, hazardous waste, waste site cleanup, pollution prevention and toxics reduction, sustainability, and innovation. The following provides a profile of the staff's knowledge and skills.



Hazardous Waste

- Policy and regulations;
- Training;
- Oversight and enforcement;
- Innovative and alternative compliance strategies; and
- Use of performance-based statistical methods to improve environmental compliance.



Sustainable Materials Management & Solid Waste

- Sustainable materials management;
- Solid waste polices and planning, including solid waste reuse and recycling;
- Zero waste policies and programs;
- Trends in management of solid waste and movement of solid waste for disposal;
- Construction and demolition waste generation, management, reduction, recycling, and regulations;
- Product stewardship and extended producer responsibility policies and programs;
- Pay-as-you-throw or unit-based pricing approaches for municipal solid waste;
- Food waste management, including composting and anaerobic digestion;
- Waste paint reduction, reuse, and recycling;
- Beneficial reuse of waste policies, regulatory oversight, and programs;
- Paper recycling from commercial sources;
- Recycling of agricultural plastics;
- Proper management of debris from natural disasters and catastrophic events;
- Policies and programs to stop open burning of waste;
- Proper management of waste tires; and
- Regulation and oversight of auto salvage yard operations.



Waste Site Cleanup & Brownfields

- Training in site assessment and remediation;
- Policies and regulations;
- Site investigation techniques for waste site cleanup;

- Remediation techniques for contaminated sites;
- Long-term stewardship of contaminated sites, including institutional controls;
- Brownfields redevelopment policies and programs;
- Renewable energy development on landfills and contaminated sites;
- Green remediation; and
- Vapor intrusion.



Priority Chemicals

- Mercury use in products and reduction of mercury use;
- Proper recycling and management of fluorescent lamps, mercury thermostats, and other mercury-added wastes;
- Mercury cleanout of schools;
- Chemical prioritization, policies, and programs;
- State chemical policies and programs;
- Priority chemicals databases and information;
- Chemical use reporting and data;
- Chemical hazardous characterization tools; and
- Alternatives assessment.



Pollution Prevention & Sustainability

- Pollution prevention policies, programs, technologies, methods, and approaches;
- Pollution prevention measurement, analysis, and databases;
- Results calculators;
- Green chemistry;
- Materials and environmental management accounting; and
- Waste and pollution prevention for targeted sectors, including hospitality facilities, groceries, marinas, garment cleaning, wood furniture manufacturing, printing, metal finishing, metal cleaning, metal coating, and others.

NEWMOA staff is skillful in:

- Facilitating groups and building consensus;
- Organizing meetings, conferences, workshops, and webinars;
- Developing and conducting training and delivering presentations;
- Identifying emerging issues;
- Developing and implementing action plans and strategies;
- Conducting policy research and analysis;
- Supporting implementation of state programs;
- Conducting outreach and education;

- Conducting research and developing materials;
- Solving problems and addressing challenges;
- Designing and managing online databases;
- Developing and maintaining social media and web-based information resources;
- Designing and developing software systems and tools and procuring and managing contractor support for software development;
- Developing documentation and training support for software systems and tools;
- Disseminating and supporting software tools;
- Conducting research, writing, editing, and publishing reports, newsletters, fact sheets, brochures, and guidance; and
- Conducting data analysis and preparing data presentations and summarizing results.

Appendix B

Northeast Waste Management Officials' Association (NEWMOA) Revenue Sources Fiscal Year 2013

Federal Funds

EPA Grants

EPA Region 1 RCRA Support	\$ 138,000
EPA Region 1 Northeast Assistance & P2 Roundtable	43,000
EPA Region 2 Support for EMFACT	<u>20,121</u>
Subtotal	\$ 201,121

USDA Grant

Re-use & Recycle Waste Paint Program	\$ 91,048
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EPA Funding Awarded Through States

Brownfields (thru Mass DEP)	\$ 50,000
Northeast Regional P2Rx FY13 (thru NH DES)	72,966
Northeast Regional P2Rx FY14 (thru NH DES)	114,885
Environmental Results Program (thru WI DNR)	<u>58,492</u>
Subtotal	\$ 296,343

Other Federal Funding

National P2Rx Web Support (thru NPPR)	<u>\$ 21,948</u>
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Total Federal Revenue **\$ 610,460**

State & Other Revenue Sources

IC2 Support (thru Rochester Institute of Technology)	\$ 100,826
IC2 Dues	50,000
IMERC Dues	92,500
State Dues	30,000
Private Foundation Grant	65,000
Meetings & Attendance Fees	20,000
Interest & Other Income	<u>1,000</u>

Total Other Revenue **\$ 359,326**

Total Revenue Sources – FY 2013 **\$ 969,786**

Appendix C NEWMOA's Current Program Area Priorities & Projects



Hazardous Waste Program

NEWMOA provides a variety of training and support services to help state hazardous waste programs develop and maintain high quality services and professional staff so that they can achieve their public health and environmental objectives.

Problem Statement

The universe of hazardous waste generators and manufacturing processes, waste management facilities, and wastes is diverse and constantly changing. Keeping up with the associated issues is a significant challenge for state environmental officials. Federal and state hazardous waste regulations and policies are also complex and constantly evolving. The state staff and management involved with their implementation find it challenging to learn about and keep up with them. Without adequate training and information sharing for program staff and management, the programs cannot provide the environmental and health protections they are designed to ensure.

There is an increasingly complex set of regulatory and policy issues that state hazardous waste programs are called upon to address. The NEWMOA states need a forum for developing and articulating their views on proposed and developing federal RCRA policy so that their expertise and experience help inform the ultimate outcome.

Many of the staff people in the state hazardous waste programs have reached or are nearing the age of retirement. This can represent a significant loss in knowledge necessary to the functioning of an effective hazardous waste compliance and enforcement program. State agencies are struggling with how to ensure proper succession and program capability. Both training and information sharing are needed to address this challenge.

NEWMOA's Hazardous Waste Program strategies:

- Provide a forum for discussion of emerging hazardous waste issues and federal rulemakings and policy developments;
- Develop and hold information-sharing and training events to address state hazardous waste program policy and technical needs;
- Assist EPA in understanding state perspectives, needs, and issues with hazardous waste management;
- Offer training for inspectors and other staff who are new to the hazardous waste programs; and
- Provide support for state program implementation.

To implement these strategies, NEWMOA currently supports the following activities:

- Providing training through conference calls, webinars, and workshops for state hazardous waste inspectors and other enforcement and enforcement-related staff;
- Developing comments on federal rules and policies related to hazardous waste management;
- Identifying emerging hazardous waste issues and challenges and sharing ideas for policies and programs to address them;
- Facilitating coordination with EPA, helping state programs implement their RCRA rules and policies, and developing regional comments on proposed federal regulations; and
- Providing a forum for sharing information on how state programs manage their Hazardous Waste Manifests and discussing opportunities for interstate collaboration to share manifests.

To conduct these activities, NEWMOA has formed the following Hazardous Waste Workgroups:

- Hazardous Waste Steering Committee (10 members, chaired by Michael Wimsatt, NH DES)
- Hazardous Waste Training Committee (21 members)
- Hazardous Waste Manifest Committee (19 members)
- Pharmaceutical Waste Workgroup (cross program with Solid Waste and P2- see description below under Cross Program Initiatives section)
- Sustainable Compliance Results (across all NEWMOA programs – see description below under Cross-Program Initiatives section)

Training Hazardous Waste Inspectors & Other Staff

Hazardous waste inspectors and other staff across the Northeast need ongoing training on new requirements, regulations, policies, and procedures that EPA develops. They are also interested in sharing information on state regulatory interpretations that may be important to their field activities. NEWMOA coordinates a [Hazardous Waste Training Workgroup](#) of state program managers and staff that develops an annual training program for state inspectors that includes workshops and monthly conference calls/webinars. The Workgroup conducts an annual survey to help identify the topics for the workshops and conference calls. NEWMOA staff organizes these events and prepares notes on the results. These training programs are for NEWMOA members only.

Coordinating Hazardous Waste Manifests

The [Hazardous Waste Manifest System](#) is a set of forms, reports, and procedures designed to seamlessly track hazardous waste from the time it leaves the generator facility, until it reaches the off-site waste management facility that will store, treat, or dispose of it. The System allows the waste generator to verify that its waste has been properly delivered and that no waste has been lost or unaccounted for in the process. State and federal RCRA programs consider this cradle-to-grave tracking an essential component of effective hazardous waste management.

State agencies receive copies of the manifests from haulers and have developed various approaches to managing, storing, and retrieving the information. In 2012, Congress passed legislation to authorize funding to create an electronic system for completing, submitting, and sharing the manifests.

In 2012, NEWMOA initiated a [Hazardous Waste Manifest Workgroup](#) to help state programs share information on their collection, storage, and retrieval of manifests and to facilitate member involvement in the development of the new national electronic manifest system that the EPA is developing. The Workgroup interacts through periodic conference calls and emails.



[Sustainable Materials Management \(SMM\) & Solid Waste Program](#)

NEWMOA helps states develop and promote sustainable materials management strategies, including reduction, reuse, recycling, and proper waste management for a wide variety of solid wastes through training, information sharing, program coordination, and analyzing data.

Problem Statement

Solid waste covers a large universe of non-hazardous materials, including residential waste, construction and demolition waste, non-hazardous industrial by-products, and institutional and commercial waste. Until the 2008 recession, the per capita generation of this solid waste rose steadily so that an ever increasing amount required management. As economic conditions improve after the recession, the per capita solid waste generation rate is likely to grow again. Waste disposal capacity in the region is constrained, as existing landfills reach their design capacity; space that is suitable for construction of new facilities is limited; and public concern grows about facilities' potential releases, emissions, impacts on property values, and nuisances. While municipal solid waste recycling grew from 1980-2000, the recycling rate has remained fairly constant at around 30 percent over the last 10 years. There is a growing need for more effective waste reduction, reuse, and recycling strategies to address these challenges.

State solid waste policy and industry activities are transitioning from a view of discarded material as a "waste" to understanding that the remaining value in these materials can in many cases be captured and conserved. State programs want to encourage and incentivize this change, but must overcome a number of policy and regulatory challenges. Many states are now implementing relatively new approaches, such as extended producer responsibility (EPR), zero waste, pay-as-you-throw, and single stream recycling, and need to learn from each other about their challenges and opportunities and what arrangements will make these approaches likely to succeed.

A waste stream that presents unique challenges for state officials in the Northeast is the material that is generated by building construction and demolition (C&D) projects. This is a very large and diverse waste stream that can contain toxic contaminants, such as lead and asbestos, and that requires special management. Helping states build capacity for the proper processing, reuse, and recycling of C&D materials has been and continues to be a priority for NEWMOA.

State waste programs receive many plans to turn previously discarded non-hazardous commercial and industrial by-products into commodities, with requests for state determinations that the proposed uses are acceptable. NEWMOA's members support this kind of reuse as a way of reducing the amount of material sent to disposal facilities, but they must also safeguard

against the potential for environmental harm. To address this challenge, many states have established Beneficial Use Determination (BUD) programs, which benefit greatly from sharing information through NEWMOA about approved BUDs and how to make their programs more effective.

Most of the states in the Northeast have included strategies to promote waste reduction and increase reuse and recycling in their state-wide solid waste plans, at least in part to address greenhouse gas (GHG) emissions. These efforts have profited from regional information sharing, networking, and development of new metrics and analyses that support implementation.

To address these challenges, NEWMOA's SMM and Solid Waste Program strategies:

- Provide an information-sharing forum focused on state solid waste programmatic and technical needs, including studies of materials and waste characterization;
- Assist EPA in understanding state perspectives, needs, and issues in solid waste management;
- Identify models that state and local programs can use to provide financial incentives for increased recycling;
- Support state programs in their efforts to advance “zero waste” and “beyond waste” by training state and local officials about these approaches and sharing experiences of successful programs within and outside of the region;
- Identify opportunities and means for state agencies to advance organics recycling through the use of methods such as food waste composting and anaerobic digestion;
- Support state implementation of EPR programs to address priority solid wastes;
- Analyze available data to help programs understand the interstate flow and disposal of solid waste within and outside of the region for use in state policy development and programs;
- Help programs improve reporting, data transparency, usefulness, and accuracy on C & D materials management facility performance to help stimulate improved processing and reuse/recycling;
- Develop and maintain a database of state-approved beneficial uses of industrial and commercial non-hazardous waste to help promote proper reuse and recycling of these materials;
- Develop an understanding of the common needs of commercial waste generators in the region and their potential to increase recycling; and
- Create a professional social network and clearinghouse for officials interested in sustainable materials management and zero waste.

To implement these strategies, NEWMOA currently supports the following activities:

- Providing training through conference calls and webinars for state solid waste managers and staff ;
- Developing comments on federal rules and policies related to solid waste management;
- Identifying emerging solid waste issues and challenges and sharing ideas for policies and programs to address them;
- Facilitating coordination with EPA, assisting states with implementation of their solid waste rules and policies, and developing regional comments on proposed federal regulations; and

- Providing a forum for sharing information and coordination on priority solid waste streams, including C&D materials, municipal solid waste that is destined for disposal, food waste, industrial non-hazardous waste, paint waste, and paper waste.

To conduct these activities, NEWMOA has formed the following Workgroups:

- Solid Waste Steering Committee (9 members, chaired by Sarah Weinstein, Mass DEP)
- C&D Materials Workgroup (20 members)
- Solid Waste Metrics Workgroup (14 members)
- Extended Producer Responsibility (EPR) Workgroup (22 members)
- Food Waste Workgroup (17 members)
- Waste Paint Project Committee (5 members)
- Commercial Paper Recycling Workgroup (32 members)
- Beneficial Use Determinations Networking Group (15 members)
- Disaster Debris Management Networking Group (9 members)

NEWMOA's SMM and Solid Waste Steering Committee identifies topics for four or five training webinars/conference calls per year to keep state solid waste program staff informed about emerging issues and challenges. The Committee selects topics for these calls based on the results of an annual survey and discussions during regular Steering Committee conference calls.

Recent calls have focused on:

- Carpet: Developing Recycling Markets and Infrastructure
- MSW Reporting
- Compost Contamination
- Landfill Post-Closure Care and Performance Evaluation
- Waste-to-Energy Facility Closures
- Mattress Recycling

The Solid Waste Steering Committee shares information and resources between their calls via email.

In the past year, NEWMOA has started organizing meetings of the EPA Region 2 SMM and solid waste staff with NJ DEP and NYS DEC staff to share information and discuss opportunities for coordination every six months. At least one of these meetings takes place in person at the EPA Region 2 Office and the other via conference call/webinar. NEWMOA staff prepares notes on the results of these meetings. NEWMOA staff participates in periodic conference calls of the EPA Region 1 SMM network to share ideas, information, and updates on activities.

Coordinating Construction & Demolition (C&D) Materials Management

Historically, C&D materials were disposed in landfills. However, available landfill space is increasingly limited in most NEWMOA states, and public opposition has severely limited the siting of new landfills. Therefore, there is an increased emphasis on the processing and reuse of C&D materials. NEWMOA's [C&D Materials Workgroup](#) provides a forum for state program staff to discuss C&D materials of concern, such as gypsum wallboard waste management, use of C&D wood for fuel, and reuse of asphalt shingles. Gypsum wallboard waste presents a unique problem when disposed, and NEWMOA conducted a project focused on increasing the [recycling of gypsum wallboard waste](#) from 2008-2010.

Over the past ten years, NEWMOA has prepared [two Reports](#) that quantify the amount of C&D materials that are generated and disposed of in each NEWMOA state and characterize the interstate flow of the materials. These Reports highlight inconsistencies in state data definitions and reporting requirements for C&D processors. To address this challenge, during 2012 NEWMOA's Workgroup developed an agreement on a harmonized set of data on C&D debris generation and management. Currently, the Workgroup is focused on implementing the necessary changes to their reporting forms and systems to address the regionally agreed-upon data fields. In 2014, the Workgroup will begin to gather and analyze a new set of data and prepare a presentation. The Workgroup also continues to examine opportunities to expand recycling of gypsum wallboard waste. The group meets approximately four times per year via conference call/webinar.

Assessing Municipal Solid Waste Disposal

NEWMOA undertakes a periodic analysis of the interstate flow of municipal solid waste (MSW) among the Northeast states. The purpose of this effort is to improve the quality of the data and ensure that state agencies have the requisite information to monitor trends in waste diversion, disposal, and interstate flow in the region. NEWMOA established a [Solid Waste Metrics Workgroup](#) that conducts this analysis every other year. The Workgroup has prepared [many reports or presentations](#) since 2000 and plans to begin collecting and analyzing data on MSW disposal in 2014 that will cover 2011 and 2012. They meet a few times per year via conference call.

Coordinating to Improve the Management of Food Waste

Organic wastes are a significant portion of the municipal solid waste (MSW) stream. [EPA has estimated that in 2011](#) the organics components of MSW were:

- Paper and paperboard (28 percent of total MSW)
- Food scraps (14.5 percent of total MSW)
- Yard trimmings (13.5 percent of total MSW)

There are significant opportunities to promote waste reduction and increase diversion of these and other organic materials from disposal in landfills and incinerators. Some components of this material (e.g., food waste) present unique collection and management challenges. The technologies for converting these wastes to energy through anaerobic digestion (AD) are rapidly improving, and there is growing interest in expanding composting and AD capacity in the northeast. State environmental agencies in the region have begun to receive applications for new AD and composting operations. The agencies are also working with local governments and waste haulers to address challenges with food waste and other organic waste collection and storage.

To support their efforts, NEWMOA has created a forum to facilitate collaboration and information sharing regarding policies, efforts to promote food waste reduction, use of food waste to help feed people and animals, siting and permitting of composting and AD facilities, and other regulatory issues and challenges as the capacity for managing diverted organics in the region grows. The Workgroup:

- Facilitates interstate discussions on emerging food waste issues and state regulatory and policy developments;

- Develops and holds information-sharing calls and webinars to address policy, regulatory, and technical needs;
- Conducts research and analysis;
- Assists state programs with specific projects as needed (and if resources are available); and
- Provides support for state program implementation.

Promoting Waste Paint Reduction & Recycling

According to a December 2011 *Washington Post* article, “the number of paint cans stashed away in garages and basements and apartment storage lockers across the U.S. probably runs to hundreds of millions.” Many communities lack convenient locations for collecting and properly managing this leftover paint. Homeowners and small businesses end up keeping the waste paint in storage, taking it to a local household hazardous waste (HHW) event, or illegally throwing it into the trash. Many HHW collection programs accept oil-based paints and reject latex paint waste because it is non-hazardous, generated in significant volumes, and expensive to manage as HHW. To address this challenge, local governments are seeking solutions that reduce the generation and increase the reuse and recycling of waste latex paint.

In 2013, NEWMOA collaborated with waste management authorities in five rural areas in Maine, Vermont, and New York to help them develop effective waste paint strategies. The project established stakeholder groups in each of these areas and:

- Developed best management practices (BMPs) recommendations;
- Held trainings on the BMPs;
- Identified waste paint solutions for the participating communities;
- Conducted assessments to determine the resources needed to implement changes; and
- Identified next steps.

This project was funded through a one-year grant from the U.S. Department of Agriculture (USDA). NEWMOA staff has shared the results and findings of the project with other communities and state programs and maintains project materials on its website.

Sharing Information on State Extended Producer Responsibility (EPR) Programs

There is a growing body of product stewardship legislation that states in the northeast have enacted in recent years. These bills cover such products as electronics, mercury-added devices, latex paint waste, mattresses, and batteries. In 2013, NEWMOA’s Board passed a [resolution](#) on the definition for product stewardship and extended producer responsibility and formed an [EPR Programs Implementation Workgroup](#) to support the state programs with addressing regulatory and other challenges. This group holds three or four conference calls per year to share updates and discuss challenges that the programs face while implementing their EPR laws.

Coordinating Recycling of Paper Generated by Commercial Sources

Research conducted by NEWMOA, its member states, and others indicates that increasing paper recycling could significantly reduce greenhouse gas (GHG) emissions. Paper is an organic material that breaks down and releases GHGs when it is burned or buried, and fewer GHGs are emitted from manufacturing paper from recycled pulp than from virgin pulp. Recycling greater quantities of this material within the Northeast could also help avoid the GHGs associated with shipping recovered paper out of the region (and often off-shore) for re-manufacturing.

NEWMOA has estimated that about six million tons of recyclable paper ends up in landfills or incinerators each year in the northeast, presenting a significant opportunity for improved recycling and reduced GHGs.

In the Northeast, there are significant untapped opportunities to divert commercially generated waste paper from disposal. NEWMOA's members have identified the following business sectors that are not yet recycling paper to their fullest potential:

- Shopping centers and malls;
- Multi-tenant commercial buildings; and
- Small businesses.

While several Northeast states have laws requiring that businesses recycle waste paper, enforcement has been problematic. State and municipal governments do not have adequate resources for enforcement, and penalties, where they exist, can be insignificant.

NEWMOA formed a [Commercial Paper Recycling Workgroup](#) that includes representatives from the Northeast states' recycling, solid waste, and economic development programs, EPA Regions 1 and 2, and the Northeast Recycling Council (NERC) to oversee its [Northeast Commercial Paper Recycling Project](#).

In the first phase of the Project, NEWMOA held a [Commercial Paper Recycling Stakeholder Summit](#) to gather ideas for significantly increasing commercial paper recycling by generators. The Commercial Waste Paper Recycling Workgroup has not been active in the past year or so due to lack of funds. However, NEWMOA's members remain interested in finding opportunities to address the issues.

Coordinating Beneficial Use Determinations

A variety of companies and individuals periodically approach state waste programs with plans to turn a previously discarded material into a commodity and ask for a determination that the proposed use is acceptable. These approvals are commonly called Beneficial Use Determinations (BUDs). NEWMOA's members support the reuse of non-hazardous waste materials as a way to reduce the amount of material sent to disposal facilities and increase sustainability. At the same time, states are also concerned about the potential environmental impacts of these alternative uses. In response, many states have established programs to accept and review proposed projects.

In 2000, NEWMOA initiated a [BUD working group](#) to help states share information about their BUD programs and the waste and use proposals they receive and approve. The Workgroup developed an on-line, members-only BUD Database so states could exchange information and improve the efficiency of their BUD approval processes. Since 2000, NEWMOA has improved the usability of the Database and expanded the information in it to over 1,500 BUDs issued by more than 25 states. The [NEWMOA BUD Database](#) is accessible to state and federal governments only. The BUD Workgroup has also produced [fact sheets](#) for the public on selected waste/use combinations.

Coordinating on Disaster Debris Management

The Intergovernmental Panel on Climate Change (IPCC) has noted that an increase in the average global temperature is likely to lead to changes in precipitation and moisture because of changes in atmospheric circulation and increases in evaporation and atmospheric water vapor. In the Northeast, storms and hurricanes are predicted to become more intense, produce stronger peak winds, and produce increased rainfall over some areas due to warming sea surface temperatures that can energize them. Recent storms, including Super-storm Sandy and Hurricane Irene, created widespread damage throughout the northeast and resulted in huge economic losses to affected communities.

Storm debris can consist of large quantities of typical building materials and MSW as well as appliances, electronic products (e.g., televisions and computers), furniture, bedding, bulky waste, and carpet. In the aftermath of a storm, large quantities of all types of debris need to be quickly and efficiently collected and properly disposed of. Some of this material can be reused and recycled (e.g., metal and wood), but specific arrangements and plans need to be made ahead of time. In the rush to manage the rapid influx of storm and other disaster debris, opportunities for reuse or recycling are frequently overlooked.

If the Northeast is likely to experience more intense storms in the future, the states need to adapt and continue to improve their capabilities to handle the associated waste debris. Individual municipalities and states often do not have adequate capacity to manage large quantities of debris, or to haul the material to central locations for pick up and management, in a compressed period of time. In addition, promoting greater reuse and recycling requires identification of locations for debris separation, collection, handling, and storage and coordination with recyclers.

In 2007, NEWMOA initiated a networking group to support state planning to manage disaster debris and create an improved infrastructure for recycling of this material. An initial meeting of the various agencies and programs in the Northeast helped promote cooperation within and among states and federal programs in the disaster planning. Currently, NEWMOA supports a [Disaster Debris Networking Group](#) that meets occasionally through conference calls to share information and lessons learned.

Assisting Communities with Save Money & Reduce Trash or Pay-as-You Throw

Starting in 2014, NEWMOA is managing a project called “Promoting Save Money and Reduce Trash (SMART) Programs in Rural Communities in New England” that focuses on rural low-population regions in Vermont and New Hampshire. The basic concept of SMART strategies is straightforward; however, the decision to adopt such a program is far from simple. Communities considering them as a solution to their mounting solid waste management challenges need help and training with deciding whether SMART is a viable option, and, if so, which factors to consider when planning and implementing it.

NEWMOA’s initiative targets the solid waste management authorities that serve the targeted areas, as well as residents, solid waste haulers, facility operators, and municipal and regional recycling coordinators. The long-term goals are to reduce the generation of solid waste and increase recycling in the targeted areas. The short-term project objectives are to:

- Help the local rural communities understand the benefits of SMART programs;

- Help the targeted areas develop SMART programs that address their unique solid waste management challenges; and
- Create a model and tools for SMART program rural outreach and assistance (particularly in low-income regions) that can be replicated in other rural areas of the Northeast.

NEWMOA is developing SMART guides and fact sheets and offering workshops and assistance.



Waste Site Cleanup & Brownfields Program

NEWMOA provides training and program support services to help its members' waste site cleanup programs successfully advance the cleanup and maintenance of contaminated property and thereby improve economic development, public health, and the environment.

Problem Statement

Throughout the Northeast thousands of sites have been contaminated by past practices and spills and require cleanup in order to protect human health and the environment. Proper cleanup and redevelopment of these sites is essential to revitalizing blighted areas, creating employment opportunities in affected communities, and achieving successful economic development in the region. An array of federal and state programs address these sites, including the federal Superfund and Brownfields programs and state waste site cleanup programs.

The contamination issues at the waste sites in the region are complex. Understanding the contaminants and how they behave in the environment presents a significant challenge for state officials responsible for overseeing cleanup. Furthermore, federal waste site cleanup policy has evolved and changed over the past 30 years. State program staff and managers need to keep up with these ever-changing policies, technologies, and approaches to assessing and remediating sites. Without adequate training for state program staff, consultants, and others who conduct site-specific work, the programs will not be able to provide the environmental and health protections they are designed to ensure.

Activities at contaminated sites to remove and treat oil and other hazardous materials, transport waste materials to offsite disposal facilities, and monitor environmental conditions use a considerable amount of energy and emit GHGs. Cleanup programs have begun to develop and implement "green remediation" approaches that maintain the ultimate cleanup goal and encourage selection of remediation techniques with low GHG emissions impacts.

Many of the hundreds of closed solid waste landfills, brownfields, and other contaminated properties across the Northeast that have limited reuse potential may provide opportunities for siting renewable energy projects, such as solar, wind, and methane gas recovery and use. However, ensuring that the intended use at these sites is compatible with their closure and cleanup is critical.

To address these challenges, NEWMOA's Waste Site Cleanup and Brownfields Program strategies are:

- Develop training events designed to improve the capacity of state officials, consultants, and others to effectively implement and oversee the characterization and remediation of contaminated sites, including green remediation principles and methods;
- Help states learn about emerging cleanup issues and identify strategies to address them;
- Help coordinate the state and federal brownfields programs and share information on program challenges and successes;
- Help state programs develop strategies to improve the effectiveness of voluntary site cleanup and Brownfields programs; and
- Help states maintain funding support for their waste site cleanup programs.

To implement these strategies, NEWMOA supports the following activities:

- Identifying emerging waste site cleanup and brownfields issues and challenges and sharing ideas for policies and programs to address them;
- Facilitating coordination among state Brownfields programs and with the EPA Regional offices;
- Providing training through webinars and workshops on waste site cleanup and brownfields programmatic and technical issues; and
- Developing comments on federal rules, policies, and programs related to waste site cleanup and Brownfields.

To conduct these activities, NEWMOA has formed the following workgroups:

- Waste Site Cleanup Steering Committee (12 members, chaired by Jay Naparstek, Mass DEP)
- Brownfields Workgroup (13 members)
- Waste Site Cleanup Training Committee (8 members)
- Mildly Contaminated Soils Workgroup (24 people) (cross program Workgroup with Solid Waste – see section on below on Cross Program Initiatives)

Coordinating Brownfields Programs

NEWMOA's [Brownfields Workgroup](#) facilitates various information sharing and technical efforts related to Brownfields and other state waste site cleanup programs. NEWMOA hosts an annual meeting of state and EPA program staff to support discussions of important brownfields and voluntary site cleanup program implementation issues.

State staffs provide essential services that lead directly to the success of Brownfields and other waste site cleanup efforts. A primary source of funding for waste site cleanup programs is Brownfields 128(a) grants from EPA. Since 2009, 128(a) funding for the New England states has been reduced by approximately 25 percent, which has affected their ability to adequately support projects. Currently, NEWMOA is supporting these state programs by developing brochures to help educate the public and policy makers about the value of the state brownfields programs.

128(a) Funding

Congress passed the Small Business Liability Relief and Brownfields Revitalization Act (the Act) in 2002 to "promote the cleanup and reuse of brownfields, to provide financial assistance for brownfields revitalization, to enhance State response programs, and for other purposes." The Act established a competitive grant program for municipalities and economic development authorities (i.e., local community grantees) known as Section 104(k). Congress also recognized that states need support in order to develop and improve their brownfields and other site cleanup programs and established a grant program known as Section 128(a).

The New England states have a legacy of former industrial sites and therefore have a large number of brownfields. To address this challenge, DEEP was among the first agencies to receive 128(a) funding and has been using it to implement their program since 2003.

The nationwide success of the EPA Brownfields Program, particularly in New England, has resulted in a growing demand among states and tribes for 128(a) funding. However, Congress set a cap on the maximum annual funding for

DEEP Program Highlights

Since 1994, grantees in Connecticut's Brownfields Program have reported:

- 3,187 jobs leveraged
- \$406 million dollars invested

128(a) grants at \$50 million. EPA is now unable to meet the demand of all of the states and tribes that need support; and therefore has had to reduce funding for long-standing programs like the one in Connecticut. As a result, 128(a) funding to DEEP has been cut by approximately 27 percent between 2008 and 2012. The ability for DEEP to provide the services that brownfields projects require to be successful has been severely compromised.

Unless Congress amends the Act and allocates more resources, additional cuts to DEEP are likely in the future. A potential solution is for Congress to increase or remove the cap on 128(a) funding and allow EPA to provide states with the resources needed to ensure that the federal funds provided to communities for brownfields projects result in success.

Getting Properties Back to Work

Waste Site Cleanup Programs Key for Connecticut Communities



Brownfields are properties, such as former gas stations and factories where redevelopment and reuse are complicated by the potential for contamination. Many of these sites are abandoned, lack financially viable owners, and are a blight on their communities. The EPA established the Brownfields Program in 1995 to support the assessment and cleanup of these abandoned properties and leverage public and private redevelopment investment that would otherwise not occur. Cleaning up and reinvesting in brownfields facilitates job growth, increases local tax bases, utilizes existing infrastructure, reduces development pressures on open land, and improves the environment. EPA supports brownfields assessment and cleanup through a variety of grants to eligible applicants.

The success of the Brownfields Program in Connecticut depends on a partnership between the Connecticut Department of Energy and Environmental Protection (DEEP), the Individual Grantees, and EPA Region 1. All three entities bring something different to the table. Each is important and key to the success of a brownfields project.

"Connecticut DEEP was instrumental in ensuring that the project was responsive to unforeseen environmental findings. Same day service, cost sensitivity, and appreciation for contractual timelines, combined with expertise in protecting the public and the environment are the underpinnings of the value-added DEEP approach."

—James Ryan,
Sheilton Economic Development Corporation

For more information contact:
Connecticut Department of Energy & Environmental Protection
Bureau of Water Protection and Land Reuse –



EPA Region 1 provides grant funding to local communities, regional economic development agencies, and other eligible parties that enables them to characterize and cleanup brownfields in accordance with State cleanup program requirements. EPA manages the grant, providing oversight and guidance. EPA also provides limited technical assistance and outreach to the public.

The **Grantee** is usually a municipality, regional planning commission, or other local non-profit entity. Grantees typically own the site chosen for remediation and redevelopment, and therefore, have important relationships with the community, particularly local residents and developers. Grantees generally hire licensed environmental professionals (LEPs) to characterize the property and lead the cleanup effort. However, they often seek input from DEEP to ensure that the site characterization

Training for Waste Site Cleanup

Generally, NEWMOA holds two or three technical workshops and two to three webinars each year. [Workshops](#) are usually open to local, state, tribal, and federal regulators, as well as consultants and others. Past workshops have covered vapor intrusion, chlorinated solvent sites, in-situ remediation, greener cleanups, and other topics. NEWMOA's [Waste Site Cleanup Steering Committee](#) selects technical and programmatic topics for the workshops and webinars, and the [Waste Site Cleanup Training Workgroup](#) plans them.







Technical Training for Waste Site Cleanup Professionals



Pollution Prevention & Sustainability

NEWMOA helps advance pollution prevention (P2) and sustainability through information sharing, training, data sharing and analysis, and a wide variety of targeted sector and topical projects to promote economic prosperity and public health and environmental improvement.

Problem Statement

All of the state environmental agencies in the Northeast have developed assistance and pollution prevention programs to help companies, communities, and institutions reduce their environmental footprints, advance sustainability, and save money. There are numerous technical and programmatic challenges facing these programs, including diminishing state and federal resources. The state program staff and management find it challenging to learn about and keep up with constantly changing P2 technologies and innovative approaches. Without adequate information sharing and training for program staff and management, the programs cannot provide adequate environmental and health protections. State programs are also increasingly challenged to capture and communicate the environmental benefits of their activities and initiatives and to demonstrate that limited resources are being used on the most effective strategies.

The economy of the Northeast has expanded beyond its traditional manufacturing base to include other types of businesses over the past 20 years. The newer economic engines in the region include high technology, hospitality and tourism, biotechnology and health care, small businesses, institutional and commercial facilities, and other service industries. These sectors face numerous environmental challenges, including solid and hazardous waste generation, the high cost and impacts of energy use and air pollution control, greenhouse gases, water use and pollution, worker health protection, and toxics in products that they purchase and use. State assistance and pollution prevention programs are developing and coordinating regionally on several approaches to help businesses, institutions, and communities implement more environmentally sustainable practices, comply with environmental regulations, and recognize leaders. The decrease in state and federal resources for these programs necessitates more integration of these approaches to leverage resources across compliance assistance, pollution prevention, and regulatory programs as well as across states.

To address these challenges, NEWMOA's P2 and Sustainability Program strategies include:

- Identify priority industrial, business, and institutional sectors and create forums for information sharing on work with these sectors;
- Develop coordinated strategies for working on priority issues, including the development of tools to promote and inform the implementation of P2 and sustainable practices and technologies;
- Facilitate communication among state assistance and P2 programs and EPA to help improve the understanding of each other's perspectives;

- Foster the exchange of information and the adoption of more sustainable practices in targeted areas;
- Improve the abilities of state P2 programs to measure their effectiveness and the environmental benefits achieved through their efforts and those of their clients;
- Support state programs efforts to collect and share a consistent set of data on the results of their P2, energy efficiency, assistance, and greenhouse gas (GHG) reduction activities;
- Exchange information with other programs nationally through the Pollution Prevention Resource Exchange (P2Rx™) and explore opportunities for leveraging resources and solving problems collaboratively; and
- Help state assistance and P2 programs promote materials tracking, energy efficiency, and GHG reductions through use of software tools.

To implement these strategies, NEWMOA supports the following activities:

- Identifying emerging issues and challenges and sharing ideas for policies and programs to address them;
- Providing training through webinars for P2 and sustainability staff on programmatic and technical issues;
- Holding annual meetings to facilitate information sharing and strategic planning;
- Developing comments on federal rules, policies, and programs related to P2 and sustainability;
- Developing and supporting sector initiatives;
- Developing online systems and resources for collecting and analyzing P2 and sustainability data; and
- Developing and supporting professional networking websites.

To conduct these activities, NEWMOA has formed the following Workgroups:

- P2 and Sustainability Steering Committee (10 members, chaired by Gary Gulka, VT DEC)
- P2 and Sustainability Roundtable
- Hospitality Workgroup (23 members)
- Sustainable Grocers Workgroup (16 members)
- Marina Workgroup (30 members)
- Garment Cleaning Networking Group (21 members)

NEWMOA also co-chairs the EPA Region 1 Green Chemistry Government Workgroup, which is focused on identifying and supporting government efforts to advance green chemistry in New England.

Facilitating the Pollution Prevention & Sustainability Roundtable

NEWMOA formed the [Northeast Pollution Prevention and Sustainability Roundtable](#) in 1989 to enhance the capabilities of the state and local government environmental officials in the Northeast to implement effective multi-media source reduction and assistance programs to promote sustainability and improvement in public health and the environment. The Roundtable serves state and local environmental assistance programs by:

- Managing a regional roundtable of state and local environmental programs;

- Managing a resource center for information;
- Conducting training sessions for state officials;
- Researching innovative and source reduction strategies and techniques; and
- Coordinating joint policy and program development.

Currently, the Roundtable holds annual meetings, supports the workgroups described below, conducts webinars and conference calls, facilitates information sharing through a [listserv](#), prepares a newsletter, and coordinates projects and initiatives. The listserv involves more than 100 members.

Coordinating Outreach to the Hospitality Sector

The state environmental agencies in the Northeast are working with EPA and each other on the development of compliance and pollution prevention assistance strategies and tools for lodging facilities and restaurants. These facilities can have a number of environmental impacts, including energy consumption, water consumption, wastewater discharges, stormwater runoff, and solid waste generation.

In 2008, NEWMOA formed a regional [Hospitality Workgroup](#) to enhance the ability of the state and local agencies to implement effective environmental assistance programs for the hospitality industry. The Workgroup holds periodic conference calls focusing on sharing information on plans underway in each state and how these can be coordinated with EPA's efforts and each other. NEWMOA also supports an email [listserv](#) to facilitate electronic information sharing by the Workgroup members. The listserv involves approximately 44 members from the region.

Coordinating Outreach to Grocery Stores

There are a significant number of opportunities at grocery stores to promote reductions in energy and water use; advance reduction, reuse, and recycling of various materials and wastes; improve management of storm water; and promote the sale and use of greener products. These measures can help mitigate greenhouse gases, conserve natural resources, create a healthier environment for employees and customers, and save money. According to a 2012 Food Marketing Institute study, stores' sustainability practices are an important factor for more than 50 percent of customers when they consider where to shop. Even as the economy recovers from the recent recession, 67 percent of consumers report that they are willing to pay more for organic products and look for locally-sourced products when shopping.

A number of NEWMOA's members have established or are in the process of creating sustainable or "green" business programs focused on grocery stores. To support their efforts, in 2012, NEWMOA launched a [Regional Sustainable Grocers Initiative](#) to promote more sustainable practices at grocery stores and recognize the efforts already underway at many stores and chains. A number of the large chains in the region, like Hannaford, Shaw's, and Price Chopper operate in multiple states, making an interstate approach to the sector sensible and efficient for state programs and grocers. The goals of the Regional Initiative are to:

- Increase adoption of sustainable practices to address environmental problems in grocery stores;
- Recognize the achievements of those within the sector; and
- Measure the environmental benefits of the initiative.

NEWMOA's [Sustainable Grocers Workgroup](#) is:

- Developing a model approach that can be implemented on a multi-state basis;
- Creating flexibility for a phased approach across states;
- Developing tools to help state programs that are working with the sector; and
- Developing tools to help estimate environmental improvements achieved through the initiative.

NEWMOA plans to formally launch the initiative in 2014.

Coordinating Outreach to Marinas

Marinas can have a large number of environmental impacts, including point source and non-point source wastewater discharges, storm water runoff, hazardous and solid waste generation, air emissions, fuel spills, spills of other hazardous materials, discharges from boat washing and maintenance operations, and other impacts on the marine environment. The state environmental agencies in the Northeast have been working with EPA and each other on the development and implementation of compliance and P2 assistance strategies and tools for marinas for the past ten years.

NEWMOA's [Marina Workgroup](#) is designed to enhance the ability of the state agencies to implement effective environmental assistance and regulatory programs for marinas and boat yards in the region. The group focuses on sharing information on plans underway and how these can be coordinated. The periodic conference calls of the Group focus on sharing information on activities in each state and how these can be coordinated with EPA's marina strategy and each other. NEWMOA also sponsors an email [listserv](#) of approximately 30 members to facilitate electronic information sharing.

Managing the Pollution Prevention Resource Exchange (P2Rx) Regional Center

NEWMOA is one of the eight regional P2 information centers that make up the [Pollution Prevention Resource Exchange](#) (P2Rx™). P2Rx is a national network of regional centers that advance pollution prevention as a cornerstone of sustainability. The goals of P2Rx are to:

- Build and facilitate dynamic regional and national P2 topic driven networks;
- Serve as the trusted source for P2 information;
- Increase the awareness, accessibility, and usability of P2 information; and
- Evaluate and measure the impact of various tools to achieve our goals.

As the Northeast P2Rx Regional Center, NEWMOA provides [P2 information and other services](#) to state and local governments and other environmental assistance providers in the region.

Currently, NEWMOA's P2Rx Center supports the:

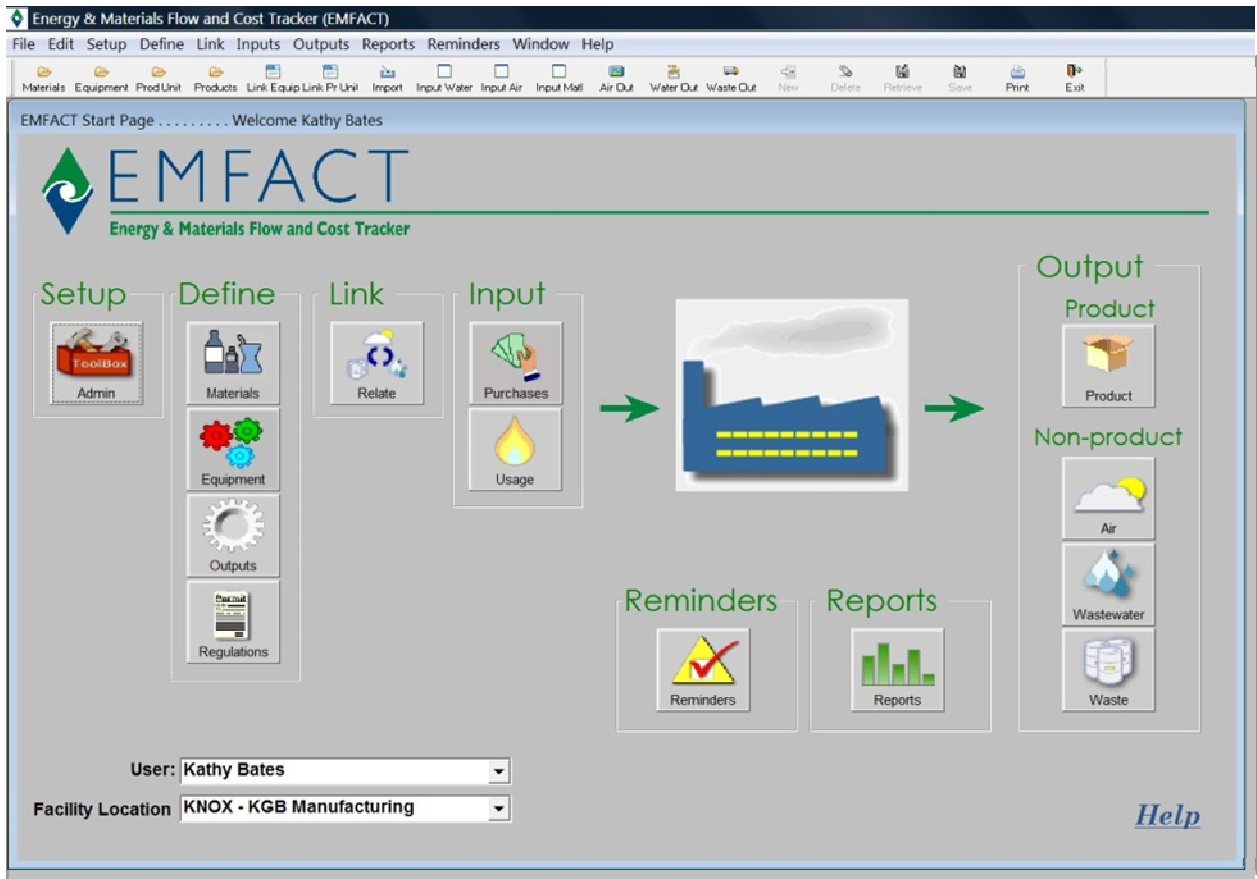
- [National Sustainable Lodging Network \(>600 members\)](#): a professional social network of sustainable hospitality practitioners and an information clearinghouse to support the work of this community;
- [Green Chemistry Connection \(61 members\)](#): a professional social network of green chemistry practitioners from business, education, government, health care, and the nonprofit sector (that plans to expand into a national network late in 2014);
- [Green Lodging Calculator](#): website designed to help hospitality facilities and assistance providers estimate the financial and environmental benefits of sustainable lodging practices;

- [Wet Cleaning Virtual Trade Show](#): online tool to enable garment cleaners and government and other technical assistance providers to conduct effective comparisons of available wet cleaning systems;
- [Northeast Pollution Prevention and Sustainability News](#): a free newsletter covering P2, sustainability, and compliance assistance government activities in the Northeast;
- [Programs Directory](#): online searchable database of governmental environmental assistance and P2 programs in the Northeast.
- [Pollution Prevention News](#): online source of news related to P2 topics.
- [Rapid Response](#): research service that aids programs in locating P2 information and answering technical P2 questions;
- [Calendar](#): online calendar that covers P2 and sustainability events;
- [Topic Hubs](#): guides to online P2 resources specific to particular subjects; and
- [Listservs](#): email lists to help participants find pollution prevention and other information.

NEWMOA is in the process of developing a zero waste professional network that should be launched in 2014.

In addition to the regional P2Rx Center, NEWMOA has provided website maintenance support for the P2Rx.org national website.

The image shows a screenshot of the 'Green Lodging Calculator' website. At the top, there is a header with a green bell icon on the left and the text 'GREEN LODGING CALCULATOR' in white on a blue background, flanked by two green leaves. Below the header is a grey navigation bar with the links 'CALCULATOR', 'ABOUT', and 'HOW TO USE'. Underneath the navigation bar, there is a blue box with the text '1. Select areas.' and a red button labeled 'Reset Calculator'. Below these elements is a row of seven icons representing different areas of a hotel: a front desk, a hallway with an elevator, a hotel room with a bed, a bathroom, a kitchen, a laundry room with washers, and a linen closet.



Supporting Collection, Management, & Analysis of P2 & Sustainability Results

NEWMOA has been facilitating regional and national initiatives to develop and implement results measures for states to use in tracking their P2 and compliance assistance (CA) activities for over 20 years. The participating state programs believe that it is particularly important to work together to develop a consistent way to measure the impacts of these efforts to:

- Communicate the activities and accomplishments of the state and local agencies to policy makers;
- Improve program management;
- Measure progress toward goals;
- Provide program funders with relevant activity and outcome information; and
- Influence policy development.

To effectively share data, programs need to use a common set of measures and compatible software tools. To support this need, NEWMOA has:

- Developed and helped the state programs to implement the [P2 & Assistance Tracker](#) software tool for managing data on activities and their outcomes (see Appendix E for a description of this and the following tools and resources);

NEWMOA **WET CLEANING PROJECT** Search NEWMOA Go!
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[Pollution Prevention & Sustainability](#) ▶ [Projects](#) ▶ [Wet Cleaning Technology Virtual Tradeshow](#)

About Wet Cleaning ▶ [Vendor Log In](#)

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Browse Vendors

Browse Washing Machines

Sign Up

WET CLEANING TECHNOLOGY Virtual Tradeshow

The purpose of the "Wet Cleaning Technology Virtual Tradeshow" is to enable garment cleaners and government and other technical assistance providers to conduct effective comparisons of available wet cleaning systems. It includes information on laundry capacity and the height, weight, and depth of the machines, as well as water, waste, and energy impacts. Users can search by [washer](#) or [dryer](#) to learn more about the specific features of the different machines.



NEWMOA staff populated the Tradeshow with information gathered from the [University of California Los Angeles' \(UCLA\) Sustainable Technology & Policy Program \(STPP\)](#) environmental garment care demonstration project report, "Equipment Report: Professional Wet Cleaning," dated June 2011, as well as other sources. In some cases, vendors of wet cleaning equipment supplied information about machine attributes, including environmental considerations.

NEWMOA has confirmed that the technologies covered in the Tradeshow meet the general accepted definition of "[wet garment cleaning](#)." To learn more, visit [About Wet Cleaning](#).

Note: tensioning equipment is an essential component of wet cleaning. However, [tensioners](#) and [cleaning agents](#) are not yet included in the Tradeshow.

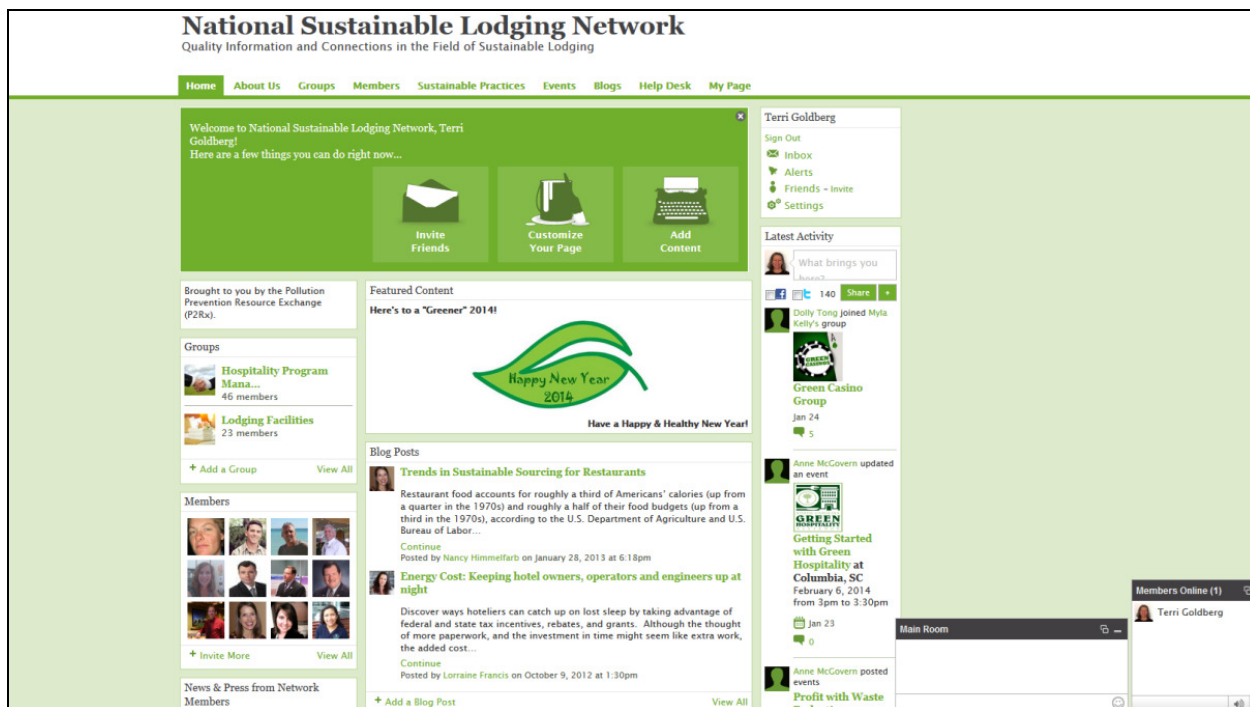
If you are a vendor of wet cleaning equipment and would like to have your product(s) presented in the Tradeshow, or you would like to add and/or edit product information, please [login](#) or [sign-up](#).

Browse By:

- [Vendors](#)
- [Washers](#)
- [Dryers](#)

- Supported the ongoing development of the [National Pollution Prevention Results System](#) as well as assisted programs in the region with sharing their results through the System;
- Developed the [Green Lodging Calculator](#);
- Developed and implemented the [P2 Data Collection Tools Database](#) to provide a way for programs to share tools and learn from each other; and
- Developed and supported the [Energy and Materials Flow and Cost Tracker](#) (EMFACT), a software tool designed to be used by companies to systematically track materials and energy use; releases, discharges, and wastes; and associated costs in ways that can create value for businesses.

NEWMOA staff co-chairs the [National P2 Results Task Force](#), which comprises representatives from state P2 programs, EPA Headquarters and Regions, P2Rx Centers, and the National Pollution Prevention Roundtable (NPPR). Since 2003, the Task Force has provided an interactive and cooperative forum for members to exchange information on P2 measurement and demonstrate the value of P2. The Task Force oversaw the creation of the [National P2 Results Data System](#) as an efficient and effective way to aggregate, analyze, and present the results of P2 efforts for different regions and the entire country. The System also provides a way for an



individual program to store and manage its own data. The System includes metrics on cost and energy savings; greenhouse gas (GHG) and waste reductions; air emissions; water use; and wastewater discharge, all of which help demonstrate the value of P2 efforts. NEWMOA provides software support for this online database to help maintain its functionality and to add new features and measures. Appendix E provides a description of this unique multi-state data system as well as the other P2 results tools that NEWMOA has developed.

As part of its support for the Task Force, NEWMOA maintains a [listserv](#) of 38 members to share information on the group's activities as well as a related [listserv](#) of about 400 P2 and assistance program managers and staff from all over the U.S. who are interested in P2 and sustainability results. The Task Force holds six to eight conference calls per year and oversees the preparation of a national report on P2 results every three years.



Priority Chemicals

NEWMOA addresses the need for increased access to comprehensive hazard, exposure, and use data on individual and categories of toxic chemicals, including mercury, and provides program coordination, training, and project support to help reduce toxics in the environment.

Problem Statement

Consumers, businesses, and policy makers express increasing concern about the safety of chemicals in consumer products. The ability of state, local, and tribal agencies to assess the hazards and risks posed by the use of toxic chemicals in products and to develop policies to protect the environment and public health from these risks is obstructed by a lack of accessible and transparent information on the chemical content of consumer products and their hazard and toxicity characteristics.

In order to reduce exposure to highly toxic substances, the Northeast states are examining how chemicals are incorporated into product design, manufacturing, and use. Green chemistry and engineering provides opportunities for safer chemistry through development and assessment of alternatives. This emerging area of research and development can spur a transformation by fostering a greener economy, new and safer jobs, and a greater confidence in consumer products.

A particular chemical of high concern in the Northeast is mercury because it is a persistent and toxic pollutant that bioaccumulates in the environment. According to various studies, mercury deposition is a significant problem in the Northeast. Consumption of mercury-contaminated freshwater fish poses a public health threat, and all of the Northeast states have issued freshwater fish advisories, warning certain individuals, particularly pregnant women, against consuming fish from affected water bodies. Combustion of municipal and other solid waste is a significant source of mercury in the region. Removal of mercury-containing products from the waste stream prior to combustion is an effective way to reduce mercury releases from these and other waste facilities. The Northeast states have set a long-term goal of the virtual elimination of anthropogenic mercury in the environment.

To address these challenges, NEWMOA's Priority Chemicals Program strategies include:

- Facilitate the sharing of data and information on chemical use, hazard, exposure, and alternatives;
- Facilitate the sharing of strategies and outcomes on chemicals prioritization initiatives
- Support the development of alternatives assessment methods and identification of safer alternatives by state agencies;
- Support state chemical policy program development and implementation;
- Help build state capacity by sharing materials, strategies, and trainings;
- Assist state programs in meeting the information needs of businesses, consumers, and the public;
- Help state programs implement mercury product notification, labeling, phase-out, and ban programs;
- Help states continue to manage effective mercury reduction programs by sharing information on program activities, successes, and challenges; and
- Help states increase collection and recycling of mercury-containing lamps and other products.

NEWMOA's Priority Chemicals Program focuses on supporting the Interstate Mercury Education and Reduction Clearinghouse (IMERC) and the Interstate Chemicals Clearinghouse (IC2). In addition, NEWMOA supports a [national mercury reduction](#) listserv involving more

than 175 members and a national listserv on [chemical policy issues](#) involving more than 210 members.

Supporting the Interstate Mercury Education & Reduction Clearinghouse (IMERC)

Starting in 1999 the states in the Northeast and other parts of the country actively began to enact legislation focused on reducing mercury in products and waste. In the Northeast, these efforts focused on provisions of the [Mercury Education and Reduction Model Legislation](#). In 2001, NEWMOA launched the [Interstate Mercury Education and Reduction Clearinghouse](#) (IMERC) to provide:

- Ongoing technical and programmatic assistance to states that have enacted mercury education and reduction legislation; and
- A single point of contact for industry and the public for information on mercury-added products and member states' mercury education and reduction programs

Overall, IMERC facilitates deliberations that provide advice and assistance to the individual states for their decision making. Specifically, IMERC:

- Collects and manages data submitted by manufacturers of mercury-added products necessary for the notification provisions of state mercury reduction legislation;
- Facilitates interstate collaboration on the development and implementation of public education and outreach programs on mercury-added products;
- Endeavors to make information on mercury-added products available to industry and the public;
- Responds to public information requests for information on mercury-added products, the requirements of the member states, and the implementation status of state laws; and
- Provides technical assistance, facilitates reviews, and makes recommendations to the member states concerning:
 - Manufacturers' applications for exemptions to the phase-out of mercury-added products,
 - Manufacturers' applications for alternative labeling of mercury-added products, and
 - Manufacturers' plans for collection of mercury-containing materials and proper waste management.

Currently, the IMERC state members include California, Connecticut, Illinois, Louisiana, Maine, Massachusetts, Michigan, Minnesota, New Hampshire, New Jersey, New York, North Carolina, Rhode Island, Vermont, and Washington.

IMERC's [Workgroups](#) include:

- IMERC Steering Committee (15 members, 2014 chair is Enid Mitnik. ME DEP)
- IMERC Notification Committee (7 members)
- IMERC Labeling Committee (8 members)
- IMERC Phase-out Committee (10 members)
- IMERC Enforcement Committee (11 members)

These Workgroups meet on an as-needed basis throughout the year.

2001 – 2010 Mercury Product Reductions


- Overall (all products) – **56% reduction**
 - 2001 – 2010: 129.53 tons to 56.71 tons
- Switches & relays – **67% reduction**
- Measuring devices – **85% reduction**
- Thermostats – **99% reduction**
- Dental amalgam – **44% reduction**
- Batteries – **155% increase**
 - 5 NEMA companies reported 6 ton increase in 2010
- Lamps – still gathering data

IMERC periodically publishes an electronic newsletter, [*IMERC Alert*](#) to inform the regulated community about deadlines and new state requirements.

Mercury reduction legislation enacted by a subset of IMERC members (Connecticut, Louisiana, Maine, Massachusetts, New Hampshire, New York, North Carolina, Rhode Island, and Vermont) requires manufacturers and importers that sell or distribute mercury-added products in the states to file a Product Notification Form. The mercury product notification requirements are intended to inform consumers, recyclers, policy makers, and others about:

- Products that contain intentionally-added mercury;
- The amount of mercury in a specific product; and
- The total amount of mercury in the products that were sold in the U.S. in a given year.

The states with notification requirements have implemented this provision by instructing the reporters to file their forms either through IMERC or directly with each of them. IMERC collects and manages the data submitted by the manufacturers and importers to help implement the state product notification requirements. The submission and approval of the Mercury-added Product Notification Forms through IMERC enables manufacturers, distributors, and their trade representatives to comply with the requirement of all of the states listed above that have the notification requirement. Nearly all of the reporters have chosen to file their forms through IMERC.



imerc alert
INTERSTATE MERCURY EDUCATION & REDUCTION CLEARINGHOUSE

January 2014

e-Filing Training Demos Scheduled

The [IMERC e-filing system](#) is up and running and companies can now begin to file their 2013 Triennial notification forms. To help coordinate this process, IMERC has scheduled the following online training webinars for system users that will cover the basic functionality and features of the product reporting system. To participate in one of these sessions, please click on the links below and complete the registration process.

- [Monday, January 27th 11:00am - 12:00pm EST](#)
- [Monday, January 27th 3:00 - 4:00pm EST](#)
- [Thursday, January 30th 11:00am - 12:00pm EST](#)
- [Thursday, January 30th 3:00 - 4:00pm EST](#)

From 2001 through 2011 IMERC received notification forms in hard copy. The blank forms were posted on the IMERC website, and reporters downloaded them and filed them through the mail. The IMERC website included instructions for completing the forms and other compliance assistance information. The staff supporting IMERC conducted compliance assistance and outreach on the requirements through the phone and by email.

Once a filing was submitted to IMERC, a multi-state review group appointed by the Commissioners or Directors of the states' environmental agencies reviewed it as group. Following approval of the submission, NEWMOA/IMERC staff drafted and sent a hard-copy approval letter and manually entered the information into an online IMERC Mercury-added Products Database. Staff also sent hard-copy letters to reporters noting errors or mistakes in their forms and requesting corrections. Some cases required multiple letters and phone calls to address problems with reporters' submissions, occurring over a period of many months and consuming a considerable amount of time. From 2009 - 2011, IMERC transformed the notification process to an electronic platform called the Mercury-Added Products Data Exchange. IMERC now manages this [e-filing system](#) and has educated the regulated community on its use. Electronic reporting began with the 2010 triennial reporting period.

The result is streamlined reporting, review, quality assurance/quality control (QA/QC), and data management processes. Electronic filing has created efficiencies in data collection and entry and greatly reduced the need for follow-up on incomplete or inaccurate data submissions. Business rules enforced through the e-filing system now largely manage the implementation of the reporting requirements. As a result, the review process by the IMERC members is more efficient, enhancing the timeliness and accuracy of the mercury-added products data. IMERC also developed an enhanced online [data browse and search system](#) and a version 2.0 Exchange

Network Node to facilitate the exchange of mercury-added products data among Exchange Network partners, including the IMERC members and EPA. Appendix F provides a write-up on this unique multi-state data system.

Supporting the Interstate Chemicals Clearinghouse (IC2)

The [IC2](#) is an association of state, local, and tribal governments that promotes a clean environment, healthy communities, and a vital economy through the development and use of safer chemicals and products. The goals of the IC2 are to:

- Avoid duplication and enhance efficiency and effectiveness of agency initiatives on chemicals through collaboration and coordination;
- Build governmental capacity to identify and promote safer chemicals and products; and
- Ensure that agencies, businesses, and the public have ready access to high quality and authoritative chemicals data, information, and assessment methods.

The functions of the IC2 include:

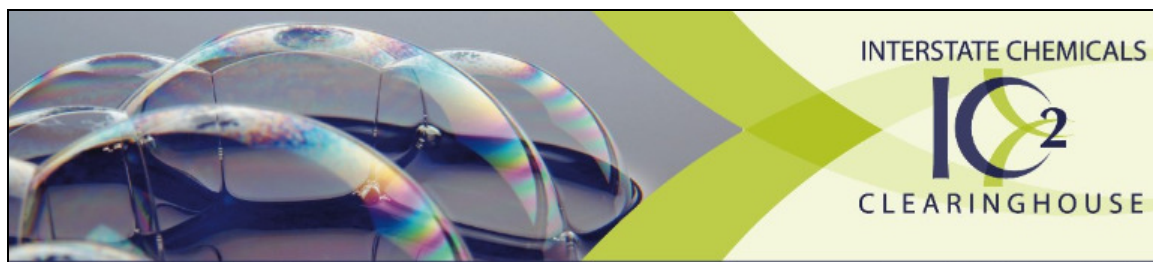
- Supporting health and environmental agencies with development and implementation of programs to promote use of safer chemicals and products;
- Supporting the development of alternatives assessment methods and identification of safer alternatives;
- Sharing data and information on use, hazard, exposure, and alternatives;
- Sharing strategies and outcomes on chemicals prioritization initiatives;
- Building the capacity of agencies by sharing materials, strategies, and trainings; and
- Assisting agencies in meeting the information needs of businesses, consumers, and the public.

NEWMOA provides management and staff support for IC2 and serves as its fiscal agent. NEWMOA maintains an IC2 listserv that includes 85 Members and Supporting Members to facilitate information sharing and collaboration.

The IC2's Board of Directors oversees the Clearinghouse's programs and activities, conducts strategic planning, sets priorities, proposes the annual workplan, develops the budget and spending priorities, and manages other critical matters affecting the IC2.

The IC2 Board of Directors comprises up to 15 representatives of IC2 Member agencies. The Director or Commissioner of the lead agency for each IC2 Member selects the Board nominee for that jurisdiction. The designee is a senior official or manager of an environmental protection/quality, environmental health, pollution prevention or other appropriate program or agency, or a member of the Commissioner's/Director's Executive Staff. The Board meets a minimum of two times per year with the IC2 Council (see below) and may meet additional times with or without the Council. The IC2's Executive Committee includes the Chair, Vice Chair, Secretary, and Treasurer, which rotate annually. The IC2 Board of Directors is currently chaired by Beth Meer, NYS DEC.

The IC2 Council supports the mission and goals of the IC2 and provides a forum for collaboration and sharing professional advice and expertise among representatives of the IC2 Members, Supporting Members, and the Board of Directors. The IC2 Council includes the Board



INTERSTATE CHEMICALS
IC₂
CLEARINGHOUSE

• B U L L E T I N

Issue 6 / Spring 2013

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IC2 News

Chemical Hazard Assessment Database
The IC2 announces the launch of a new online resource, called the [Chemical Hazard Assessment Database](#) that enables users to search for [GreenScreen™](#) and [Quick Chemical Assessment Tool \(QCAT\)](#) assessments. The purpose of this database is to promote awareness of assessments con-

developed a simplified version, called the Quick Chemical Assessment Tool (QCAT). The primary goal of the QCAT is to assign an appropriate grade for a chemical using a subset of high priority hazard endpoints identified in the GS that requires fewer data sources. This tool can be used to screen chemicals to ascertain whether a more in-depth GS assessment is necessary and to provide an approximation of the potential concerns associated with a chemical based upon limited data. To help users understand the differences between GS and QCAT, the Database provides a profile of the end points that each of them covers.

The IC2 is making GS and QCAT assessments available as a service to its membership and user community. The IC2 and its members review the submitters of the assessments and determine whether they are qualified to conduct this kind of analy-

of Directors and representatives of IC2 Member and Supporting Member organizations. The functions of the IC2 Council include:

- Provide a venue for discussions and exchange among IC2 Members, Supporting Members, and the Board;
- Recommend priorities and focus areas for IC2 Workgroups, programs, and activities;
- Assist with recruiting members for IC2 Workgroups and participate in Workgroup activities
- Assist with planning IC2 events and promoting IC2 initiatives;
- Share information on international, federal, state, tribal, and local chemical policies and proposals;
- Share technical information resources and databases related to chemicals in commerce and identify technical expertise related to focus areas; and
- Assist with funding IC2 activities.

Representatives on the IC2 Council serve for two years, with the opportunity to continue for an additional term.

The IC2 supports regular educational webinars and conference calls and publishes the [IC2 E-Bulletin](#) a few times per year to keep IC2 Members and Supporting Members and others informed about the activities of the Clearinghouse, its members, and related national and international programs.

The IC2's [Workgroups](#) include:

- IC2 Database Workgroup (25 members)
- IC2 Alternatives Assessment Workgroup (23 members)
- IC2 Training Workgroup (5 members)
- IC2 Governance, Outreach, and Recruitment Workgroup (5 members)

In the past two years, the IC2's Workgroups have focused on developing several online databases that are outlined below.

Various IC2 members have published lists of priority chemicals as part of their efforts to implement new state legislation. To support and assist these efforts, the IC2 has developed an online, searchable database that combines these state lists, called the [State Priority Chemicals Resource](#). Users of the Resource can:

- Search for chemicals on one or more state lists;
- Identify source lists for the chemicals;
- Identify hazard and toxicity characteristics associated with the chemicals; and
- Link to additional information on the chemicals.

The [Chemical Hazard Assessment Database](#) (CHAD) enables users to search for [GreenScreen™](#) and [Quick Chemical Assessment Tool](#) (QCAT) assessments. The purpose of this database is to promote awareness of hazard assessments conducted on chemicals of concern and their potential substitutes, facilitate transparency and discussion, and reduce duplication of effort.

The [State Chemicals Policy Database](#) is a searchable database of passed and pending state-level chemicals legislation. Users can search the database by state, region, status (e.g., enacted, proposed, and failed), policy category (e.g., pollution prevention, single chemical restriction), chemical, and product type (e.g., children's products, cleaning products).

There are a vast number of products in commerce containing chemicals of concern. Some IC2 members have passed legislation requiring the submission of information on the uses of these chemicals in products. To support and assist implementation of these reporting requirements, the IC2 has examined [various chemical use reporting programs](#) to help work toward a coordinated system and prepared a [Report](#) that presents its findings.

Alternatives assessment (AA) is a set of tools that manufacturers, product designers, businesses, governments, and other interested parties can use to make better, more informed decisions about the use of toxic chemicals in their products or processes. The IC2's [Alternatives Assessment Guide](#) is designed to enable member states to standardize the AA process. The goals for the Guide are that it:

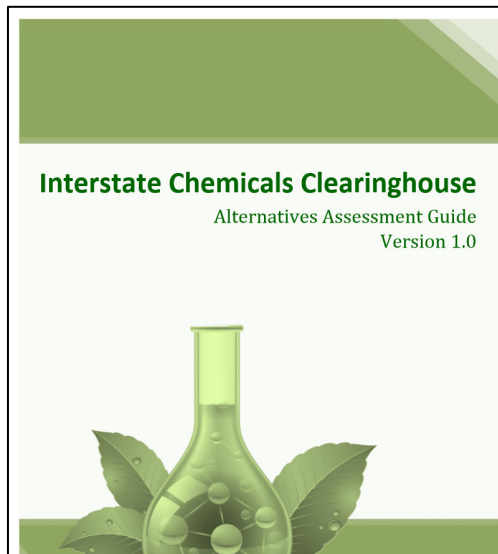
- Is flexible enough to meet a wide range of user needs, including small, medium and large businesses, local, state and federal governments and other interested parties;
- Helps to reduce risk by replacing toxic chemicals in products with safer alternatives;
- Includes all reasonable criteria to be addressed in an alternatives assessment including hazard, exposure, process engineering, price and availability;
- Defines the minimum amount of information needed to conduct a robust alternatives assessment; and

- Includes sufficient flexibility that potential users can define what comprises an alternatives assessment.

The AA Guide helps states with similar interests to share AA results conducted by one member state among the larger IC2 membership. Previous experience has shown that resources are not optimized when multiple states work on the same issue without sharing expertise and results.

In 2014, IC2's priorities will focus on:

- Planning for a multi-state data collection and management system for information on the use of priority chemicals in products;
- Planning for a multi-state data collection and management system for data generated through state product testing efforts;
- Supporting implementation of the Guide;
- Maintenance and updates to existing IC2 databases and information systems;
- Providing training on alternatives assessments and priority chemicals;
- Coordinating with EPA Headquarters on their efforts and those of IC2; and
- Conducting training, education, and outreach activities.



Cross-Program Initiatives

NEWMOA helps pilot and deploy a variety of innovative strategies that improve the efficiency and effectiveness of state programs and that address environmental problems that cross traditional program boundaries. The Association's cross-program initiatives and workgroups are described below.

Improving the Management of Mildly Contaminated Soils

Construction, utility, brownfields, and waste site cleanup projects can generate quantities of excess soil that cannot be reused at the project site and can contain contaminants at levels that are detectable but below those that would qualify them as hazardous waste. The management of these mildly contaminated soils can significantly impact the cost of a construction or remediation project and therefore hinder economic development. The goal of NEWMOA's [Mildly Contaminated Soils Management Project](#) is to share information that helps each state develop a framework that:

- Protects human health and the environment;
- Provides clarity for utility, construction, and other private developers;
- Provides clarity for municipal, county, and state government agencies;
- Develops requirements that are not onerous for states or stakeholders to implement;

- Preserves landfill capacity by allowing non-landfill uses, as appropriate;
- Promotes cost-effective alternatives;
- Advances consistency within the state; and
- Advances consistency among states in the region, where feasible.

NEWMOA's [Contaminated Soils Management Workgroup](#) facilitates information sharing and identifies programmatic and policy options for the members. The group comprises 24 members from state and EPA waste site cleanup and solid waste staff and managers.

NEWMOA's Mildly Contaminated Soils strategies are:

- Characterize current practices allowed by state programs for managing various categories of mildly contaminated soil, including urban fill, catch basin sediments, street sweepings, and remediation sites;
- Identify approaches and policies, such as non-degradation and beneficial use determinations (BUDs), that state programs have used or could use for managing the various categories of mildly contaminated soils;
- Prepare fact sheets that describe state programs that address mildly contaminated soils to clarify and assist the regulated community; and
- Develop and share a summary of available resources, including rules, guidance documents, and fact sheets regarding approaches for managing mildly contaminated soils, including information on BUDs for specific categories of soil, certification, notification, documentation of site history, and sampling protocols.

Currently, NEWMOA's Mildly Contaminated Soils Workgroup is compiling and sharing information on changes to state programs via NEWMOA's website and determining and mapping the locations of sites in the region that accept soils, as feasible.

[Promoting Improved Pharmaceutical Waste Management](#)

The environmental concern about pharmaceuticals in the environment continues to grow as more and more are discovered in surface water, ground water, landfill leachate, and aquatic life. An aging population and new drugs brought to market exacerbate the problem. EPA is developing new regulations under RCRA Subtitle C to address pharmaceutical wastes that qualify as hazardous waste. While EPA is likely to allow more regulatory flexibility for health care facilities managing pharmaceutical wastes, it will only apply to the small percentage of pharmaceuticals regulated as hazardous waste under RCRA. The vast majority of pharmaceuticals are drain disposed or discarded in the trash, allowing for a direct means of environmental release. More appropriate treatment technologies, such as high temperature incineration are being advocated as a part of new regulatory approaches.

NEWMOA is interested in improving pharmaceutical waste management. The Association has advocated for new regulatory approaches and coordination with other regulatory agencies (such as FDA and DEA) that could yield a more holistic, flexible, and environmentally-sound approach to pharmaceutical waste management. This might also include a new regulatory framework outside of RCRA that includes education, producer responsibility, and convenient collection for households and other small generators.

In 2013, NEWMOA formed a cross-program Pharmaceutical Waste Workgroup to facilitate:

- Sharing monitoring data related to pharmaceuticals in the environment;
- Continuing to coordinate with EPA on federal regulatory approaches to pharmaceutical waste management;
- Sharing information on enforcement of existing laws and regulations in the region;
- Keeping informed about regulatory approaches being tested in other states and jurisdictions; and
- Working collaboratively to develop the elements of possible new regulatory approach and model legislation.

The Workgroup includes 17 representatives of state hazardous and solid waste and pollution prevention programs.

Supporting Sustainable Compliance Strategies & Results

Traditional facility-by-facility approaches to environmental protection involve establishing standards, issuing permits, conducting inspections, and undertaking follow-up enforcement actions. Historically, environmental agencies have focused on deploying this strategy to address concerns at relatively large facilities. However, in an era of declining government resources, expanding pollution concerns, and greater interest in addressing environmental issues at smaller facilities, government agencies have developed innovative strategies that help them advance compliance, document results, reach a larger number of facilities, and gain efficiencies. There are a growing number of these compliance strategies that states and EPA are utilizing, including one called the Environmental Results Program (ERP).

For the past ten years, NEWMOA has supported state efforts to develop and implement new compliance strategies that build on and leverage traditional approaches. NEWMOA's compliance strategies efforts focus on:

- Facilitating information sharing on innovative compliance strategies;
- Providing technical support to develop the tools for implementing sustainable compliance strategies (SCS);
- Assist state programs with conducting data collection and analysis on environmental performance measures; and
- Assisting state programs in communicating to U.S. EPA and others the value and importance of SCS.

From 2006 to 2010, NEWMOA coordinated the [Common Measures Project](#), which targeted facilities that generate small quantities of hazardous waste (called small quantity generators or SQGs). The Project involved ten states performing a statistically valid number of facility inspections using a common inspection format. The performance data obtained from each state was compared to the other states to highlight statistically valid differences. States also provided descriptions of the amount and nature of compliance and beyond compliance assistance provided, compliance inspection triggers and frequency, and enforcement tools and reporting requirements in place during the three years prior to the project. The project then compared this program design information to the performance results to identify the oversight practices associated with higher performance rates.

From 2009-2013 NEWMOA supported the implementation of a multi-state [ERP for auto body refinishing shops](#). Auto body shops can be a significant source of volatile organic compounds and other air pollutants in neighborhoods and areas where they operate. State programs have focused on the auto body sector because there is a relatively new EPA area source rule that applies to certain shops and requires them to reduce their emissions.

NEWMOA has been facilitating the national [States ERP Consortium](#), which provides states, EPA, and other interested groups with a forum for sharing experiences, expertise, and resources in developing and implementing ERP approaches to effectively address priority environmental issues. The Consortium, which was organized in 2006, includes 19 member states that are using, or learning how to use, ERP to address priority environmental problems. NEWMOA supports a [Consortium listserv](#) of more than 80 members.

The States ERP Consortium held a [National Meeting on Environmental Compliance Assurance & Performance Measurement Strategies](#), June 19 and 20, 2013 in Arlington, Virginia, and NEWMOA is collaborating with the Environmental Council of the States (ECOS) on the next steps for the Consortium.

As a follow-up to the National Meeting, NEWMOA has recently formed a regional [Sustainable Compliance Results Workgroup](#) to facilitate collaboration among the northeast states and with U.S. EPA Regions 1 and 2 on promoting the use of a variety of approaches to advancing, monitoring, and enforcing compliance with regulatory requirements and measuring performance as critical to effective, efficient, and sustainable environmental protection. The group is focusing on:

- Sharing lessons learned and tools;
- Communicating success stories to build stakeholder support; and
- Expanding support for various performance measurement and compliance monitoring approaches and strategies to promote their wider use and institutional acceptance.

Promoting Continuous Improvement Practices & Efficiency of State Programs

Public sector agencies are experiencing increasing pressure to identify opportunities for improving their efficiency, in part in response to reductions in their budgets. They are using continuous improvement practices to help them examine opportunities for making such changes.

Continuous process improvement methods, such as Lean, help organizations identify and eliminate unnecessary and non-value added process steps and activities. Lean is a business model and set of methods that help eliminate waste while delivering quality products on time and at least cost. These process improvement approaches were developed originally for private-sector manufacturing processes, but there has been steady progress towards adapting them for service and administrative processes.

A number of NEWMOA's members are implementing lean and significantly improving permitting, administrative reviews, enforcement, and other processes. By enabling these routine activities to function more smoothly and consistently, staff time can be freed up to focus on higher-value activities.

The state staff and management involved with implementing lean find it difficult to learn about and keep up with the innovations in the methods and how they can be applied. Without adequate information sharing and training for program staff and management, the states' lean efforts will not maximize their effectiveness.

NEWMOA's continuous improvement practices strategies:

- Provide a [forum for sharing information](#) on and discussions of continuous improvement initiatives and applications by NEWMOA's members;
- Develop and hold training events on lean and other methods; and
- Provide general support for state continuous improvement activities.

NEWMOA's [Lean Practitioners Workgroup](#) meets periodically by conference call to address these strategies. NEWMOA supports a [listserv](#) of 60 Workgroup members to promote information sharing and collaboration between the calls. The Workgroup is planning a regional lean summit to take place in 2014.

Appendix D
Guidance on Developing NEWMOA Documents on Federal Policy & Regulatory Proposals
Approved by the NEWMOA Board of Directors
March 9, 2012

EPA and other federal agencies regularly request comments from state agencies and other stakeholders on issues that concern the NEWMOA member states, including rulemaking initiatives and policy development. NEWMOA is often interested in coordinating the development and compilation of comments to the federal agencies on behalf of member states for a variety of reasons. State management and staff working on these efforts appreciate the opportunity to understand and learn about the views of other state agencies, and the discussions and debates among state officials on federal policy and regulatory issues help the individual state agencies clarify and refine their own positions or views. In addition, state members sometimes want to submit comments through NEWMOA because it is more efficient than sending state comments individually (or for other reasons). The federal agencies are interested in receiving comments that reflect consensus or agreement among states because it gives that position or argument more weight and helps to clarify areas of agreement and disagreement.

NEWMOA efforts to support state comments to EPA and other federal agencies can take the form of:

- Sharing information on an issue or proposed rule through email, conference calls, webinars, or meetings;
- Convening a conference call or webinar to share individual state draft or final comments or sharing them via email; and
- Facilitating efforts to draft agreed-upon comments in the form of letters on behalf of the Association that reflect the views of NEWMOA's members.

NEWMOA regularly undertakes one or all of these methods to support members' efforts to review and comment on federal policy issues.

NEWMOA's Board developed this Guidance to assist the Board's, steering committees, and workgroups understanding of the options for developing comments to federal agencies and how to address situations where state members disagree on an issue or policy. The NEWMOA Board of Directors has the authority and discretion to modify the steps and framework outlined below to address particular circumstances and policy issues.

To initiate the development of a comment letter or position statement (document) to federal agencies, any NEWMOA Board member, program area chair, steering committee, or workgroup can make a proposal that a document be developed. They should bring the subject, issue, policy, or rulemaking to the attention of the Board and propose that the organization undertake a coordinated effort to comment on it. If the Board agrees that NEWMOA should develop such a document, NEWMOA staff and the relevant program area chair should initiate a discussion with the appropriate steering committee, ad hoc group of Board members, or workgroup to draft the initial document. Once the committee or workgroup has finalized a version of the draft letter, the

members of the group should ask the NEWMOA Board members from their state and any other management of their agency that needs to be informed to comment on and approve the final draft document. Individual members of the committee or workgroup may want to touch base with other key managers or directors of their agencies as the comments are being formulated to make sure that there is agreement on the positions and messages before the final draft version is distributed for final approval. When state agency managers give final approval through the Board members and any other relevant senior managers, this should be communicated with the NEWMOA staff through a phone call or email. If a majority (i.e., five of the eight member states) of the Board reaches agreement on the final document, NEWMOA staff can send the letter.

NEWMOA strives to reach consensus among all its members on comment letters to EPA and other federal agencies. However, there are times when this is not possible. In those cases, the Board has the following options:

- Revise the document to indicate where there is consensus among the NEWMOA members and where there is disagreement;
- prepare the document only discussing areas of consensus and remaining silent on the areas of disagreement (state programs can comment on these issues/topics in the individual documents they send);
- prepare a document that reflects the views of a majority of the members (i.e., five or more of the eight member states) and notes which states agree on the positions and which ones disagree or have alternative points of view; or
- decide not to prepare a NEWMOA response or document if there is not a majority position (members would prepare and send in their own responses, and NEWMOA staff would request that they share these individual documents with NEWMOA in order to share them among the state members so that state members' positions are better understood).

Under any of the scenarios outlined above, NEWMOA's activities should not be viewed as preventing or substituting for efforts by states to prepare and send individual documents.

The discussions and debates among the state management and staff should be conducted in a professional manner with everyone respectfully listening to each other's points of view. The role of the NEWMOA staff is to help facilitate the interactions among the state members and to help keep the process moving forward toward a conclusion.

Key Steps to Implement Guidance

- NEWMOA's Board, steering committees, and workgroups should share information on a federal policy or regulatory development via email, conference call, webinar, or meeting (sometimes this information comes directly from the federal agency/ies, ASTSWMO, or other sources).
- The NEWMOA Board, steering committee, or workgroup decides whether they want to prepare a document to send to the appropriate federal agency/ies or to share state draft comment letters.

- If the idea for developing a NEWMOA document originates in a steering committee or workgroup, the program area chair or NEWMOA staff should notify the Board by email or during a conference call or meeting and ask for their views.
- A group of NEWMOA state members, other appropriate state managers, or NEWMOA staff should prepare an initial draft document that becomes the basis for NEWMOA's response.
- The appropriate or delegated NEWMOA group reviews the draft via email and/or conference call and makes suggested edits and changes; this process may require multiple drafts and discussions to reach agreement among at least a majority of the members.
- The NEWMOA Board members review the draft document and may make changes. The NEWMOA Board members may solicit review and comment by higher-level agency managers.
- If the document is based largely on a letter or document prepared by one state, the Board may want to note this and urge the federal agency to be sure to read that state's document to understand how their position is the same or different from NEWMOA's.
- The NEWMOA Board approves the document.
- The approved document shall be signed by the current NEWMOA Chair; if that is not possible, the Vice Chair shall sign the document. In unusual circumstances, where neither of these individuals is able to sign the document, the NEWMOA Executive Director shall sign it.
- The document is sent to the appropriate agency (email or hard copy as appropriate) and emailed to all NEWMOA Board members and appropriate committees and workgroups.
- An electronic copy shall be kept by NEWMOA staff for the record and posted on its website.

Appendix E

Success Story: Transforming P2 Results Data into Actionable Information



POLLUTION PREVENTION P2Rx RESOURCE EXCHANGE

Advancing pollution prevention as a cornerstone of sustainability.

P2 Information ▾ P2 Services ▾ Networking ▾ Regional Centers ▾ About P2Rx ▾

Search P2Rx Go!

National P2 Results Data System

[Login](#)

Home	Admin Area	Highlights	Reports	About	Tools & Guidance
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P2 Results

The P2 Results System is designed to collect readily available data on waste reduction and resource efficiency efforts ("pollution prevention," or P2) from public agencies across the country.

The data helps quantify P2 progress related to air, water, waste, and energy resources. The System also translates P2 progress into bigger-picture contexts such as climate change, habitat, and sustainability.

Question mark icons  display useful definitions and examples to help the user understand the System's input and reporting features. After entering input data, the user is given a chance to review, approve, and print it before submitting it to the database.

NEWMOA has been facilitating projects to develop and implement a set of metrics for state programs to use in tracking their pollution prevention (P2) and compliance assistance (CA) activities and results for over 15 years. The Association believes that working together to develop a consistent way to measure the impacts of P2 and CA enables state programs to:

- Effectively communicate their activities and accomplishments to policy makers;
- Improve program management;
- Measure progress toward goals;
- Provide program funders with relevant activity and outcome information; and
- Influence policy development.

To effectively share data, programs need to use a common set of measures and compatible software tools.

The results of NEWMOA's efforts are a number of tools that are available online:

- [National Pollution Prevention Results System](#) for aggregating P2 results nationally.
- [P2 and Assistance Tracker](#) for activities and their outcomes;
- [P2 Data Collection Tool](#) to provide a way for programs to share these tools and learn from each other;
- [Green Lodging Calculator](#) to help lodging facilities and sustainable hospitality programs estimate the financial and environmental benefits from sustainable practices; and
- [Energy and Materials Flow and Cost Tracker](#), to help small and medium-sized manufacturers track and evaluate materials use and profitability.

P2 Results Data System

The P2 Results Data System is designed to collect readily available data on waste reduction and resource efficiency efforts from public agencies across the U.S. The information from the System helps quantify progress related to reducing air and water pollution and waste and improving energy and water use efficiency. The System is designed to translate P2 progress into the wider context of climate change, habitat, and sustainability. It includes:

- Activity measures (e.g., trainings conducted, technical assistance site visits conducted);
- Behavioral results (e.g., clients reporting development of P2 policies and compliance improvements); and
- Outcome measures (e.g., hazardous waste reduced, water conserved).

Registered users have a user name and password that allows them to input data and view a report that summarizes the data from their agency or program.

System development started in 2004 and has been funded through a series of grants from the EPA National Environmental Information Exchange Network (NEIEN) awarded to NEWMOA and its partners as contracts with the Colorado Department of Public Health and Environment from 2005 to 2006, the Michigan Department of Environmental Quality from 2007 to 2009, and the Washington Department of Ecology from 2010 to 2013. NEWMOA, as a Pollution Prevention Resource Exchange Center (P2Rx), other P2Rx Centers, and the National Pollution Prevention Roundtable (NPPR) developed and implemented the System under the framework of the [National P2 Results Task Force](#), which comprises representatives from state P2 programs and EPA Headquarters and Regions. The Task Force has developed an evolving set of P2 measures that is described in the [Data Dictionary](#). The Task Force prepares reports every three years that aggregate and present [national results for P2](#). Prior to 2006, these reports were compiled from hard copy surveys, and since then they have been based on the results from the System.

Today the P2 Results Data System includes a user interface that facilitates data sharing and aggregation and a reporting feature that enables users to generate reports based on location and time period. Currently, approximately 90 programs from all over the U.S. provide data to the System.

The P2 Results Data System evolved out of work conducted by P2Rx Centers in EPA Regions 1, 2, and 10. In 2001- 2002, the [Pacific Northwest Pollution Prevention Resource Center \(PPRC\)](#), the P2Rx Center for EPA Region 10, created a P2 Results Measurement Tool with funding from the Region and Oregon's Dept. of Environmental Quality. Development of the tool was facilitated by the contributions from local and state P2 program managers in the Northwest. At the same time, NEWMOA was developing a core set of P2 measures and creating a desktop tool for P2 Programs to use to track their work. This effort led to the creation of the Pollution Prevention and Compliance Assistance (CA) Tracker with initial funding provided by EPA Region 1. In 2003 – 2004, PPRC and NEWMOA, along with the other P2Rx Centers and NPPR, started working collaboratively on the development of a National P2 Results Data System through the P2 Results Task Force. In 2005, this collaboration launched the first version of the P2 Results Data System, and until 2012 the System was managed as a distributed platform with individual regional modules residing and collecting data on the websites of each P2Rx Center. However, over time, supporting such a decentralized system became increasingly unwieldy, hard to analyze at a national level, and difficult to maintain and upgrade.

In 2012, NEWMOA consolidated and improved the System so it is now a single platform with access provided through each P2Rx Center's site. These upgrades, along with others, facilitate improved data sharing and analysis on a national scale, the ability to search data by state, the ability to distinguish between EPA-funded and other funded projects and results, and the addition of greenhouse gas and sustainability measures.

NEWMOA also finalized the development of a node for P2 data sharing among participating state programs and EPA. The node conforms to all of the standards for EPA's Environmental Network and was launched in November 2012.

P2 & Compliance Assistance Tracker

With funding and support from EPA Region 1 and oversight by an Assistance and Pollution Prevention Metrics Workgroup, NEWMOA developed a Microsoft Access-based database software application, "Pollution Prevention and Compliance Assistance Tracker" (called Tracker). This software application contains sections for tracking program activities, including:

- Working one-on-one with clients (such as on-site visits and research);
- Producing educational and outreach materials;
- Sponsoring workshop/training events;
- Responding to information requests; and
- Multi-faceted initiatives.

The Database can also help programs track the outcomes associated with their activities, including environmental, behavioral, and economic outcomes. Because each state's P2 and compliance assistance program is somewhat different in the scope of its activities and its structure, the software can be customized so the programs can use only those components and the level of detail that suit their needs. From 2010 - 2012, NEWMOA made a number of enhancements to the database software. A key enhancement allows users to develop reports that use the same metrics as those in the National P2 Results Data System, making it easy for programs to transfer their data to that System.

Tracker is available for use by state, local, county, university, and tribal government entities. Programs can request a copy on the [Tracker](#) webpage.

P2 Data Collection Tools Database

NEWMOA developed an online resource, called the [P2 Data Collection Tool](#), to enable P2 and environmental assistance programs to share their data collection tools. The overall purpose of this effort is to provide a way for programs to learn from each other and avoid reinventing available tools. EPA Region 1 provided funding to support this project.

The Tool includes surveys, worksheets, self-certification forms, protocols and standard operating practices (SOPs) for follow-up to technical assistance visits, quality management plans (QMPs), and checklists that programs use to collect information from their clients. These data can be used to understand the behavioral, environmental, and financial results from site visits, workshops or training events, and in response to an email, phone inquiry, or other social media technology.

Users of the Database can customize their [search](#) based on the relevant sector or topic, type of P2 activity, or type of P2 data collection tool used. They can also [add](#) their own data collection tools to the system.

Green Lodging Calculator

NEWMOA developed the Green Lodging Calculator to help lodging facilities and hospitality programs estimate the financial and environmental benefits from sustainable practices. The Calculator is the culmination of a multi-year effort aimed at improving the methodologies used to estimate and communicate the positive environmental and financial [benefits of sustainable lodging practices](#).

The calculator contains over 40 waste-, water-, and energy-related measures covering 18 common practices that lodging facilities can implement. These are only some of the sustainable activities that can result in environmental and financial savings. Many third-party certification programs, as well as state and local certification/recognition programs, promote additional sustainable practices that are yet to be built into the Calculator. To discuss additional measures and otherwise connect with professionals in the field of sustainable lodging, state programs, lodging operators, and others can join the [National Sustainable Lodging Network](#), an online social network and information clearinghouse to support individuals working on greening lodging.


Energy and Materials Flow and Cost Tracker (EMFACT)

[EMFACT](#)TM is a software tool designed to be used within companies for systematically tracking materials and energy use; releases, discharges, and wastes; and associated costs in ways that can create value for businesses. The tool can provide a comprehensive picture of resource use and its relation to production and planning that can help improve both business and environmental performance.

NEWMOA and the Massachusetts Office of Technical Assistance (MA OTA) partnered to create EMFACT in response to the need and opportunity for manufacturers to more effectively implement environmental management accounting as a key tool in setting pollution prevention priorities, identifying value-added opportunities for sustainable production, and implementing materials and energy efficiency improvements. EMFACT can be a useful adjunct for compliance assurance, quality management, lean manufacturing, environmental management systems, productivity and resource efficiency improvements, and preventing accidents and losses. As a tool for better understanding and optimizing resource use, EMFACT merges the aims of environmental performance and lean manufacturing to reduce unnecessary wastes and costs.

Appendix F

Success Story: Transforming Paper Forms to E-Forms & Enhancing Data Availability Mercury-Added Products Data Exchange



IMERC Mercury-Added Products Reporting System

Overview

Welcome to the Interstate Mercury Education and Reduction Clearinghouse (IMERC) Mercury-Added Product Reporting System. This e-filing System replaces the paper Mercury-added Product Notification Form submission process and enables companies to comply with the Mercury-added Product Notification requirements of Connecticut, Louisiana, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. The System also helps reporting entities comply with IMERC-member states' labeling requirements by enabling them to indicate if their mercury-added products are properly labeled in accordance with local, state, or federal regulations.

All aspects of the Notification process, including Form submission, attachment submission, and post submission communications, are handled through the e-filing System. Users can get help through the "Need more help?" link located under the login fields, which provides a PDF document to assist users with navigating the online Notification process. If you need assistance during your submission, please review the help documentation before contacting the IMERC Coordinator.

For more information about IMERC and its activities, visit www.newmoa.org/prevention/mercury/imerc or contact Rachel Smith, IMERC Coordinator, 617-367-8558, or imerc@newmoa.org. IMERC is a program of the Northeast Waste Management Officials' Association (NEWMOA). NEWMOA's staff provides logistical, facilitation, and technical support for the activities of IMERC.

NEWMOA contracted with enfoTech & Consulting, Inc. to develop the IMERC Mercury-Added Product Reporting System using their GovOnline software platform. GovOnline is a web-based "Permits/Licenses" and "Online Services" management system, which allows public users to electronically report and agency officials to review and approve submissions online. More information about enfoTech and GovOnline are available by following the link in the footer below.

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Release Date: December 20, 2013
Version: 1.1013.1220.17367

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The [Interstate Mercury Education and Reduction Clearinghouse](#) (IMERC) (see pages 47-50) collects and manages the data submitted by manufacturers and importers to help implement states' mercury-added product notification requirements. The submission and approval of the Mercury-added Product Notification Forms through IMERC enables manufacturers, distributors, and their trade representatives to comply with the requirements of all of the states listed above that have the notification requirement. Nearly all of the reporters have chosen to file their forms through IMERC.

From 2001 through 2011, IMERC received notification forms in hard copy. The blank forms were posted on the IMERC website, and reporters downloaded them and filed them through the mail. The IMERC website included instructions for completing the forms and other compliance assistance information. The staff supporting IMERC conducted compliance assistance and outreach on the requirements through the phone and by email.

Once a filing was submitted to IMERC, a multi-state review group appointed by the Commissioners or Directors of the states' environmental agencies reviewed it as group. Following approval of the submission, NEWMOA/IMERC staff drafted and sent a hard-copy approval letter and manually entered the information into an online IMERC Mercury-added Products Database. Staff also sent hard-copy letters to reporters noting errors or mistakes in their forms and requesting corrections. Some cases required multiple letters and phone calls to address problems with reporters' forms, occurring over a period of many months and consuming a considerable amount of time.

Starting in 2010, NEWMOA/IMERC transformed the notification process to an electronic platform called the Mercury-Added Products Data Exchange. This work was funded through a contract with the Massachusetts Department of Environmental Protection (MassDEP) using funds from an EPA National Environmental Information Exchange Network (NEIEN) grant.

e-Filing System

In 2010, NEWMOA/IMERC procured subcontractor support from [enfoTech](#) to establish the e-filing system for mercury-added product reporting and administration. In the late fall of 2011, NEWMOA/IMERC launched this [e-filing system](#) and began to educate the regulated community on its use. This e-reporting began with the 2010 triennial reporting period.

The result is streamlined reporting, review, quality assurance/quality control (QA/QC), and data management processes. Electronic filing has created efficiencies in data collection and entry and greatly reduced the need for follow-up on incomplete or inaccurate data submissions. Business rules enforced through the e-filing system now largely manage the implementation of the reporting requirements. As a result, the review process by the IMERC members is more efficient, enhancing the timeliness and accuracy of the mercury-added products data.

NEWMOA selected a commercial off-the-shelf electronic reporting application, [GovOnline](#), as the base to support the e-filing and administration system. NEWMOA and its subcontractor documented and refined the business rules governing the submission and review of data. The project team developed a system-design document as a blueprint for its overall design, and NEWMOA/IMERC made subsequent modifications to the base data system.

Data Sharing Systems

NEWMOA/IMERC and its contractor developed a utility to enable states, EPA, and other interested parties to download the mercury-added product data in XML format. This provides IMERC members and EPA with the flexibility to analyze the data to suit their individual needs. The Association submitted a data configuration schema packet to the Network Technology Group (NTG) of the Exchange Network (EN), which is managed by EPA, for review prior to implementation on the Toxic Containing Products Data Exchange on the EN website.

NEWMOA/IMERC and its contractor also developed an enhanced online [data browse and search system](#). The Association updated and modernized its online database so that it connects with the e-filing system and is an improvement over the previously published version of the database. The general public can now browse the mercury-added product data by product category or company, as well as perform more discrete queries through a custom search feature that allows users to narrow their search to subcategories of products or mercury content limits. In addition, the

system can generate automated analyses (reports) so that the IMERC members can more easily identify trends in the use of mercury in certain types of products.

Exchange Network Node

Finally, NEWMOA/IMERC and its contractor established a version 2.0 Exchange Network Node to facilitate the exchange of mercury-added products data among Exchange Network partners, including IMERC members and EPA. To inform this work, NEWMOA performed an assessment of the infrastructure needs for the node and node hosting. The Association selected a managed hosting service as the preferred option over self-hosting or co-location and established a version 2.0-compliant node in accordance with all EN specifications, requirements, and procedures.