



NHDES

NH Small Quantity Hazardous Waste Generators

SQG News

August 2020

Compliance Assistance and Pollution Prevention

WASTE REDUCTION HIGHLIGHT



Lori Nadeau-Birch Street Collision

Birch Street Collision, located in Derry, NH, is a family-owned business and has been in operation since 1994. The shop has eight bays, a paint room, a downdraft spray booth and eight long-term employees. Birch Street is a long-time member of the New Hampshire Automobile Dealers Association (NHADA) and their Collision Repair Advisory Group (NHCRAAG). One of the many services that NHADA offers to its members is training and suggestions to improve environmental compliance.

In 2010, the NHDES Small Business Technical Assistance Program partnered with the NHADA to provide training to auto body and collision repair shops to be up-to-date on environmental regulations on the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating. These workshops also provided sector-specific training on hazardous waste requirements for auto body shops. Lori Nadeau, Birch Street Collision Office Manager, stated "I believe NHDES, in conjunction with NHADA, does an incredible job at balancing what is right for the environment and working directly with New Hampshire businesses to ensure compliance."

Birch Street Collision wanted to minimize their generation of hazardous waste. Their first approach was to make a significant investment to switch to water-based paint. Unfortunately, due to the size of the shop, the curing time of the water-based paint, the number paint jobs needed to be successful, and the lack of proper reimbursement of paint and materials from the auto insurance companies, water based paint was not a feasible option. Birch Street Collision then invested in a new, strict measurement system of solvent-based coatings which minimized the amount of product used and hazardous waste generated. Although this new paint mixing system came at a cost, its efficiency and hazardous waste minimization was worth it. By implementing accurate mixing, Birch Street Collision has increased the number of paint jobs, but has not seen an increase in the generation of paint

COMPLIANCE CORNER

What is one of the most common violations found during inspections?

OPEN & UNMARKED Hazardous Waste Storage Containers!

Why do we keep them closed?

- Reduce spills
- Keep vapors in
- Keep sparks/sources of ignition out
- Give operators time to read the label of what is in the container before adding the wrong stuff
- Keep rainwater out that could displace the waste out of the container

One business left its hazardous waste storage containers open and a fire occurred. The water being sprayed hit the open container and made the fire worse causing significant damage.

Keep Hazardous Waste Storage Containers CLOSED at ALL Times!

QUICK LINKS

- Past issues [Small Quantity Generator News](#)
- Hazardous Waste Determination [videos](#) - [factsheet](#) - [checklist](#)
- NHDES Hazardous Waste Management Bureau at (603) 271-2942 or email hwcomp@des.nh.gov
- Hazardous Waste Hotline: (866) HAZWAST

waste. Shops have no control over the cost of paint or the cost of hazardous waste disposal, but they do have control over the amount of paint used and waste generated.

“It is extremely important to future generations that we not only take care of our hazardous waste properly, but that we all try to use more environment-friendly products, and with the rising costs of materials and the reimbursement rate of paint and materials having been stagnant for years, we had to look at other ways to save money. We can’t control the EPA regulations; we can’t control the disposal costs so we had to control the amount of waste. I think we have done that very well,” says Nadeau.

In addition, Birch Street Collision contacted their local utility vendor for an energy audit. Through the audit, Birch Street switched from oil heat to natural gas, upgraded to 3-phase power, and replaced lighting ballasts to reduce energy costs. As noted by Dan Bennett, NHADA, “By not having an energy audit and not implementing efficiency suggestions and upgrades, businesses are leaving money not just on the table, more like leaving money on the floor.” More information on energy audits can be found on [NHsaves.org](https://www.nhsaves.org).

E-MANIFEST UPDATE

As we head into the third year of the 3-5 year eManifest phase in, NHDES wants to help you to register (if have not done so yet) and become familiar with the system before the EPA requires that everyone must be signed up and use the electronic manifest system. We do not have any guidance on when this will occur so we are recommending that hazardous waste generators sign up for eManifest sooner than later.

NHDES Hazardous Waste Certification Program Manager, Julie Ashton is currently creating videos that walk you through the eManifest process. We will let you know when they are available. Until then, there is a pre-production or practice site. This site allows you to practice registering as a generator, create an eManifest and see every step the eManifest goes through, such as who can sign it, who can change it at each step, what a printed eManifest looks like, and how to view a finished eManifest after it has been signed by the Treatment, Storage and Disposal Facility (TSDF).

The Nuts and Bolts: We highly recommend having multiple people registered as the Site Manager (if appropriate for the size of the facility). There have been a number of incidents where the person registered as the Site Manager has left the company, and the new Site Manager doesn’t have the log-in information or permission to remove them from the company’s eManifest webpage. The Site Manager is the person who has the greatest control of the eManifest system for their company. They can create and sign manifests, and if they have other personnel in-site that they want to view, create or sign manifests, they can give some control to those individuals. These individuals can be assigned a “view only” role, where all they can do is review already created manifests. The Site Manager can also give permission to an employee to prepare a manifest, but not sign it, or permission to review and sign only. There are many options to explore.

When you are done exploring the pre-production site, you may register as Site Manager for your company on the actual eManifest site. Once your registration is approved by the NHDES Reporting and Information Section, you will be able to perform all the duties of a Site Manager, and manage “real” eManifests for your company.

Until the video guidance has been published, you can contact Julie Ashton directly at julie.ashton@des.nh.gov if you would like help with registration and she will set up an online meeting to walk you through the process and answer any questions you may have.

ENVIRONMENTAL COMPLIANCE TRAINING FOR SMALL BUSINESSES



The [EPA Small Business Branch](#) is partnering with the [National Small Business Environmental Assistance Program](#) to host virtual training sessions September 8 - 11, 2020 daily from 1 to 4 pm. The agenda will include a variety of EPA experts and technical topics including the following:

- EPA Deputy Administrator, Doug Benevento — welcome
- EPA's Office of Small and Disadvantaged Business Utilization — updates
- EPA's Office of Enforcement and Compliance Assurance — new compliance initiatives
- EPA's new Learning Management System — introduced
- EPA's Office of Air Quality and Planning Standards — updates on new initiatives
- State Small Business Environmental Assistance Program representatives — variety of topics including assistance during COVID, annual report review and virtual resources for 2021 and beyond

Representatives from small businesses, environmental compliance and pollution prevention technical experts, as well as regulators, are expected to join the event. EPA is providing registration at no cost, but participants will be required to pre-register. Registration will open in late July and updates will be posted on the [Annual Training webpage](#).

REMINDER

October 1st will be here before you know it and NHDES will be sending SQG self-certification forms and explanatory information to each SQG whose certification is due January 1, 2021 - SQGs in Belknap, Carroll, Coos, Grafton, Merrimack, and Sullivan Counties. If you need help completing the self-certification form, NHPPP staff are happy to help. Please email us at NHPPP@des.nh.gov or call 603-271-6460.

CONTACT US

If there is something you would like to read more about such as: developing a regulatory checklist, reporting on episodic events, used oil recycling, pharmaceutical waste, or other topics of interest, please feel free to provide feedback to NHPPP@des.nh.gov.

