Julie Churchill: Good morning, this is Richard Currie with the Maine DEP. Hi, everyone. I'm Julie Churchill with Maine DEP.

We are recording this, and it will be available on our Web site. You will get an alert to that through the Maine Marine Trades. I will ask that you don't speak through this talk, and most likely I'm going to follow up at the end with a brief talk on lowering your environmental footprint. What I will ask is that you don't ask any questions. If you have a question, please write it down and talk to us afterwards. What we're going to do -- I already have one from our previous session -- we are going to be putting those up on our Web site, too, so you will be able to review the question and answer. This session is going to be very tight. There's a lot of material to be covered, and we're going to be available this afternoon back at our booth in the main room. So, again, I would ask you to hold questions and talk to us later, and write down your questions so we can record them and provide answers to everyone that can't make it.

With that, I'm going to have Rick Currie from our Hazardous Waste Unit take over.

Rick Currie: Welcome to the Department of Environmental Protection Hazardous Waste Management Rules Webinar. Today we're going to cover the basics of hazardous waste management, including what really boils down to three elements:
Identification of the waste at your facilities and whether or not they're hazardous; the on-site management; and the transportation and disposal of the waste.

First thing you need to identify is whether you have a hazardous waste at your site. So anything that is leaving the facility -- paper, ink cartridges, lightbulbs, trash, anything you have to get rid of from your facility as a waste. Look at it in reference to hazardous waste determination rules, and you can very easily identify whether or not you have a hazardous waste or not.

Anything that is useless, unwanted or a discarded substance; whether or not you have a future use for it. So if you have waste gasoline that comes in on a vessel that you're working on, that's gasoline. That gasoline is no longer useful for that vessel, then that gasoline is a waste.

The gasoline is also ignitable. Therefore, it's a hazardous waste, so it must be managed according to the hazardous waste rule.

Any types of spills, leaks, discharges onto the ground have to be cleaned up. And if they originate from a hazardous material, that cleanup material would be hazardous waste as well.

Even if the material does not leave your site, sufficient as open containers of paint that you are allowing to dry, which is considered illegal and a form of treatment, would not be--
would also be considered a hazardous waste. You have to identify everything that is sitting in the corners, stuff that you think you might use some day, but it's sitting there five days and it hasn't been used.

If an inspector shows up they will look at what you use, and if you tell them something in the corner you will use eventually, he will generally give you the benefit of a doubt but if the container is broken or doesn't look like it's been opened in five years, at a minimum we will do an inventory and have you check to see if you are going to use this.

As far as hazardous waste, you with a point to look at the four questions: Is it excluded waste? Is it listed in the regulations? Does it have hazardous characteristics? Or is it a mixture of hazardous waste and non-hazardous waste?

Some of the exclusions are household waste, which you may actually encounter with the gasoline issue. If a vessel is privately owned, has no commercial entity involved with it, then the gasoline that is pulled off that vessel can be considered household hazardous waste and can actually be given to a customer to take care of. So it doesn't become your waste.

Unused, unexpired materials in their original container. So if you have an unopened container of paint that you can't use any longer, but the boatyard down the road can use it, there is an exemption for trading that stuff as long as you have a letter that says, we, XYZ boatyard, intend to use it for what it was
originally designed for.

There is a scrap metal exemption so anything that is an actual piece of metal, even if it is hazardous -- lead, chromium, different things like that, mercury -- it can go through recycling and would not be a hazardous waste. Mercury would fall under the universal waste rule if it's contained in a thermometer or boat hist or something like that -- boat lift or something like that.

"F" listed substances include solvents that you can find in your paint; you can find as a stand-alone product such as acetone, methylethyl ketone. You can find it in aerosol degreasers. And the problem with the "F" listing is that you need to look at the percentages to see if it is the same percentage as used in a particular product; which, automatically, regardless of how it's used or what it's used on, it will maintain that hazardous use designation. If it's on a rag, if it gets mixed with your waste oil, the entire batch of your waste oil becomes hazardous waste.

Some other examples of the "F" listings are benzene, ethyl acetate, toluene, xylene, and methanol.

Characteristic wastes. Means the product is ignitable, corrosive, reactive, or it's toxic, based on the list found in Chapter 850 of our regulations.

Ignitability characteristic means that the product has a flash point of less than 140 degrees Fahrenheit.
If it is an oxidizer, which your peroxide would be considered an oxidizer.

Other examples that you might find are your resin, solvents and degreasers, oil-based paint, and styrene.

Corrosivity characteristic is anything with a pH of less than 2 or greater than or equal to 12.5 on the pH scale.

Some corrosivity examples are chlorine bleach, paint strippers, broken or leaking batteries, and muriatic acid.

Reactivity characteristic. Reactivity characteristic is anything that is unstable, explosive, anything you are stockpiling that creates toxic waste; those would fall into the reactivity characteristics.

The MEKP are considered reactive material, so if you end up with waste on that, I know everybody is pretty observant of the fact that that stuff is highly explosive, if it gets too much light. Old ethers and peroxides, you want to be careful of those, if it is stored, it's in long-term storage, and you find it, be careful how you handle it after that.

The toxicity characteristics are contained in the D004 through D017 in the state regulations and the D042 in the federal regulations, some of which are not -- they will be identified in the federal rules but they are not actually state-regulated lists, because our list is older than the current federal list. Which just means that when we come for an inspection, we wouldn't write you up for benzene as a toxicity
waste; but if the EPA came, they could actually take your gas filters, if they were -- even if they were drained, and consider them contaminated with benzene and can still be a hazardous waste.

As far as mixtures go, anything that is non-hazardous, like waste oil, mixed with a hazardous waste, becomes hazardous waste.

What does this mean to you?

So you need to determine if the waste is hazardous waste, manage those wastes properly, and call us for help. I am sure you were at the previous training. I think you will find that for the most part, unless you were already on the list to be inspected, we haven't been to see you, because we are not -- that's not the way we want to operate. We give a lot of the benefit of the doubt as far as if you attended the training, that we expect to be able to give you some time to go back, put it into place, and if we show up now, I would expect that you would be at least somewhat complaint at this point.

Some important phone numbers. You can reach our Hazardous Waste Unit at 287-2651, and just ask for anybody in the hazardous waste enforcement unit.

And there are other numbers listed on the Web site. The two that are important to you on this list as well are the reporting of an oil spill and the reporting of a chemical spill.

All spills in the state of Maine are required to be
reported -- oil and chemicals, regardless of the amount -- unless you have an FTPC plan on file with us that would specifically list the chemicals that you want to have exempted under the report-everything rule.

We have three levels of management requirements in Maine. We have the Small Quantity Generator, the Small Quantity Generator Plus -- which you will never find in the rules because it is not a word that actually exists in the regulations -- and a Large Quantity Generator.

In order to establish which one you are, you need to know how much hazardous waste you generate in a month or how much you are keeping on site at a time. You cannot accumulate any more than 55 gallons of hazardous waste, that's cumulative of all the waste on site that are hazardous, at any time, if you are going to remain a Small Quantity Generator. You cannot generate more than 27 gallons a month at any level, or you are automatically a Large Quantity Generator.

The "Plus" allows for an additional two 55-gallon drums, so you can have a total of three 55-gallon drums on-site at any time.

And a Large Quantity Generator generates more than 100 kilograms of hazardous waste in a month, or if you accumulate more than three 55-gallon drums.

Management requirements for Small Quantity Generators (SQGs). There's only ten items. If you keep less than 55
gallons on site, and for the most part do not generate more than 27.5 gallons, you have ten items that you need to take care of.

You got to determine if your wastes are hazardous. So going back to everything that is leaving the facility, everything that is sitting in a corner that hasn't been used for six months or more, and determining whether or not it's hazardous.

It has to be stored in a 55-gallon or less size container. We have seen containers that are 100 gallon containers and they don't think they are a Large Quantity Generator. Doesn't matter. It has to be 55 gallon or less.

Each container has to be labeled with the words, specifically, "Hazardous Waste." Does not have to be a commercially generated label. You can write it on with a paint pen. You can stick a piece of masking tape on there. As long as it says, "Hazardous Waste," you are covered.

The other item that has to be on the label is the date you first put waste in the container which is the accumulation start date.

For a Small Quantity Generator the start date is not important to you; it's more important to us. I guess in a way it is important to you, because it helps you determine how fast you are generating waste. So if you started on October 1st and then on October 30th you had 30 gallons of waste in there, you are over the large quantity standard.
It helps us to determine how long these drums have been on site, and how long it's taking you to generate waste.

Another big container is full waste.

That's where you start as Small Quantity Generator. And as "Plus" it takes 180 days to ship that off-site. You have an limited amount of time to collect waste as Small Quantity, Small Quantity Plus. After full date of each container you have 180 days to ship it off-site. And you have to report your hazardous waste and hazardous matter discharges to the DEP at 1-800-452-4664.

You document all your shipments on hazardous waste manifest. There shouldn't be anybody coming to your facilities to pick up waste. There shouldn't be anybody driving off your facility with waste in their pickup truck or giving it away. Anything that is a hazardous waste has to be documented on a hazardous waste manifest. Your transporter will have access to these documents. If you want them yourself, you can order them from us. They are free, we will just give them to you. Most of the time it is easier for your transporters to get them prefilled when they come to your site with your name and your ID number if you have one.

You have to use a license to have a hazardous waste transporter, and it has to go to a facility that is licensed to receive hazardous waste from a business. Some of the transfer stations that take hazardous waste from households but they
cannot take it from a business.

If you are a Small Quantity Generator, you will be using the generic ID number on the top of your manifest that is MEX02, followed by seven 0's.

You may find out that you have a number that is similar to this, with a four-digit code at the end which is an internal DEP number that helps us put your waste into its own ID number. If you get that number for some reason, if your transporter ends up handing it to you, just stick with the all zeros. Don't try to use your number, because if it comes through like that, it may end up getting put in the wrong spot.

Again, the waste must leave the site within 180 days of the full date of the container.

SQG+ has ten additional requirements. You have all the SQG requirements that we just went through. You have to obtain an EPA identification number, which is free. You fill out the form 8700-12, Notification of Regulated Activity, and you can send me an e-mail, I can send you an link to EPA site-hazard. Fill out the form completely. It has to be physically signed and mailed back to the DEP. It used to be that we had to send them to the EPA to get them assigned. We do it all in-house now so it is a pretty quick turnaround to get your number.

You begin to need -- this slide says daily, but it's actually weekly inspections, as of December 3rd. So if you are SQG+ or LQG, you are going to weekly inspection requirements.
You should have a written log of those inspections, including the person who conducted the inspection, the date, the time, and in the back of the generator handbook there is an inspection checklist that gives you all of the items that are required to be checked every day. You can take that, manipulate it however you want, come up with your own. You have oh maintain all the containers in good condition. So anything with a dent in the side of it, there shouldn't be any rust on the bottom. There should be no rust at all on the containers, obviously, they've got to be stored inside, and they need to be closed.

Also for storage of containers they should be stored on a firm, impervious working surface with secondary containment. So 4-inch slab of concrete or asphalt as the base, and then you have to have secondary containment that will collect the largest container of plus 10 percent.

As far as the containment goes, a lot of the plastic containment systems that are available through some of the online stores or the catalog stores are not big enough for the hazardous waste rules. You have to make sure that you have at a minimum 65 gallons for a single container.

Your ignitable and reactive wastes have to be 50 feet from the property line. So if your hazardous waste storage area is next to the neighbor's property line you can't have any ignitables in it. It has to be moved. And at that point you
need to go through closure per Chapter 851, Section 11, for cease operations of hazardous wastes at the site.

Okay. Now we are into the LQG requirements. Everything we've already talked about, add on the containers now have to be shipped within 90 days of the start day. It doesn't matter if there is 50 gallons or 100 gallons, if it hits 90 days, it has to leave.

You have a personnel training requirement. All people involved with hazardous waste have to be trained to the level that they are involved. A person who is responsible for taking drum A over to the drum storage area, and that's all they have to do, that's all they have to be trained on. If you have someone in charge of actually placing the drum, they have to be trained on proper labeling, site it, make sure the containment is there; and obviously your manager should have a full external training program for the complete hazardous waste rules specific to Maine.

You have to develop a contingency plan. There's a list of deficiencies in the back of the handbook, which you can turn around and use as your actual checklist to make a contingency plan. I never recommend that you use an outside source to develop a contingency plan unless you are big enough to have to incorporate it into an integrated contingency plan, because it's really simple to just go through the steps, put the information we're asking for, and have it in some kind of a logbook or
You have to attempt to make arrangements with local police, fire, hospital, the state response division, and any other response contractors you may use in your area. All that requires you to do is send them a letter with your contingency plan initially and say, look, we're here, this is what we're doing, we'd like to make sure that your services were available if we need them.

The only thing you need to show proof that you attempted is the certified copy of the mail that you sent it to them. They don't have to respond yes, we will be there or no we won't be there, or come out and do a physical inspection of the facility, which is all good things, if you can get them to come out, because I'm sure they would love to what they are getting into if they are looking into a hazardous waste, when it's on fire, just to know what's going on.

And you have to submit an annual hazardous waste report. Generally what happens is we send you the list of manifests that we've received; what we have on record as far as the amount. You go through your record, you say yes, yes, yes, to each item. If it's all there, you're good. If you find some that weren't sent in, just send them in. If you find some that you don't have that we have, send them in.

At the LQG level, Large Quantity Generator level, you have to establish a hazardous waste storage area. This area needs to
be locked, it needs to have communication, it needs to have specifically a sign that says, "Danger, Unauthorized Personnel Keep Out."

If you stored valuable waste in the hazardous waste storage area, you need to have a "No Smoking" sign as well. That's in all instances. So if you have a building that has an overhead garage door that leads into the site, the signs have to be on that overhead door. They have to be on all side doors that directly enter into the hazardous waste storage area.

No level of generator is allowed to treat hazardous waste in the state of Maine without a license. In the past, what we've seen some industries doing was taking what is expired product that can no longer be used, mix with another product, putting them together to form a non-hazardous waste. If the intention of putting those products together is to dispose of the product, that's treatment, cannot be done.

If it is through gluing processes that you end up with a little bit of leftover that is going to harden, that's fine. Just make sure it is completely hardened. As far as the polymers, if you can, spread them out so that they are thin enough so you won't end up with a gelled thinner on anything that you are trying to -- on anything that is leftovers.

No open burning, no evaporation. So leaving the canopy, trying to reduce your waste by just allowing it to evaporate -- not allowed.
And, of course, no dilution. So doesn't matter how much water you put into it, and you put it into the sink. If it started out as a hazardous waste, that's not okay.

So as far as exemptions from treatment licensing, it's pretty much only for corrosive waste in small quantities. So you can take a 500 milliliter batch of an acid or a base, properly mix it so that it becomes a pH that is non-hazardous, which is above 2, and less than 12.5, and you can discharge per POPW and put it in the drain, if they allow that.

Totally enclosed treatment units, which would essentially be, if you had a process that took the waste automatically to a wastewater treatment plant, and the plant was designed to treat the hazardous waste before anything was discharged, that would be exempted. We found a lot of these in silver recovery units for photo processing which doesn't apply to you, but that is one of the areas where totally enclosed means you cannot physically add anything to the system. So you may see it in a paint-washing station, or a gun-washing station, where you put it inside the machine, you close the cover, it washes everything, and it's got a recycler within it that processes the thinner and makes it clean again, all by itself. That would not need a license.

If you take thinner from a job and pour it into the machine to have it work on it, that does need a license.

Common problems, we see across the board with generators.
Failure to determine. We show up, we see a drum in the corner, what is it? Well, it's gasoline we have been collecting all year. Why is it here? What are you planning on doing with it? Well, we don't know, we didn't know what to do with it. That's a failure to determine.

Throwing stuff in the trash. Again, we go back to a failure to determine. Because if it was determined up front it was a hazardous waste, you would have known not to throw it in the trash.

Leaving stuff open to evaporate.

Too much stock, old stock, essentially squirreling stuff away, with initially the intention of using it at some point. Sometimes we will see it with boat colors: We have to keep this boat color because it is under warranty. Well, 25 years later, the boat color is still sitting in the back room, and the boat is not even on the water anymore, but now you have a hazardous waste. And it's something that can be overlooked for so long, that you end up with a whole back room full of it, and that's when start getting in trouble with us.

Kicking off the old material for disposal purposes.

And waste gasoline. I'm sure it's been a problem forever, but recently with the ethanol, I'm not sure if the increases were just an initial thing where all the tanks had to be replaced but we see a lot of waste gasoline coming out of boat yards, junk yards, and it's just not being properly managed. A
lot of people are just throwing it away, it's a fire hazard waiting to happen.

So that concludes the Webinar for Hazardous Waste Management.

Welcome to the Maine Department of Environmental Protection Universal Waste Management Webinar.

Universal wastes in Maine have been regulated since December of 2000, with an effective date of January of 2001 where everyone should have been capturing their wastes -- universal lamps, CRTs, recyclable batteries.

Universal wastes are hazardous wastes. They are within the hazardous waste rules. The reason why they were brought into regulation is because just about everyone is generating them as a business. Everybody has lamps, mercury vapor lamps, CRTs, and they are using rechargeable batteries -- and all manufactured products. So most anything you will find as a universal waste is going to contain the waste, the hazardous portion of it. It is going to be within the lamp, within the motherboards on the computer processors, it's going to be within the batteries.

Universal waste in Maine includes rechargeable batteries, button cell batteries, and small, ketone web acid tubes. Large automotive batteries are not considered universal waste. They can be sent directly to the site without any management standards. The only time they come in is if they are broken; then they are hazardous waste.
CRTs, cathode ray tubes, which are the old computer monitors, they have the large plug of lead on the end of them, where the tail comes -- where the monitor comes down into a tail, there's a large amount of lead on the end of that, and there's also a lot of chemicals within the glass itself, in the duct work within the CRT.

Lamps, including fluorescent lamps, mercury vapor, fluorene vapor, anything that is not an incandescent or fluorene bulb is hazardous waste. Mercury thermostats, switches, that you find in the switch, pumps, and totally enclosed PCB ballasts. If you take out a ballast and it has "No PCBs" on it, then it is not a universal waste; but anything that contains PCB is.

Mercury. Motor vehicle switches, which are generally in hood latches, trunk latches, could be in doors; light switches in the older models; and anything else that contains mercury. If it contains mercury, it needs to be managed. You need to get rid of that actual product that it's in.

The reason why Maine was so eager to put Universal Waste in was because of the massive amounts of mercury that we find in our waterways. The Department of Inland Fisheries and Wildlife does not recommend that children under 8 or women of childbearing age eat any fish from the waters of Maine, unless it's Landmark or Booksville (phonetic). Those two escaped the closings for mercury poisoning.

And everyone else is, just eat fish once a month, what
they're supposed to be eating.

If you break any type of mercury-containing device, or a lamp, you have worker safety issues, because it will put you over the threshold for exposure to your workers. If it's broken on the floor similar to a concrete floor or something that is a hard surface, it's fairly easy to clean up. We've done an extensive study with the breakage of the small CFLs, and we find that floors that are coated, like wooden floors that are coated with poly, the mercury goes into the poly and you can't clean it up. It needs to evaporate. You need to let it sit there but the longer it sits there the more it goes into the plastic.

As far as cleanup, anything that you use for the cleanup, expect that it will going to be exposure. Don't vacuum -- don't use your vacuum on it, because another thing we had happen, broken lamp, they used the vacuum cleaner on it, well that goes in and sticks to the motor and every time you turn it on, this mercury is blowing out the other end.

Collection methods for universal wastes. You have quite a few options that you do for the have with hazardous waste. You can self-transport universal waste to a local -- the local transportation, there we go.

If they will accept it from commercial entities. They may charge you by the foot. It's generally less expensive than going through a commercial transporter, which is your other option. And you can also use the state-approved manufacturer
takeback program, including the RBRP battery boxes that are found at local hardware stores, the green and white boxes. If you have rechargeable battery, go in and return them right there, it's free, and it's available to you.

There's also some programs for the CFL takeback at Lowe's, Home Depot, I think Wal-Mart takes them back as well, where you can take the small CFLs in and they will take care of those for you as well.

Some of the major differences between universal waste and hazardous waste, you have longer storage time, can you self-transport, you can use a universal bill of lading instead of a manifest, which, again, is provided by your transporter.

There should be some type of paperwork that is issued to you when you are getting rid of your universal waste. If you self-transport through the municipal area, make sure you get a receipt, because they're going to ask you for a receipt. They are going to ask you where you are sending them. If you sell them to the transfer station, great, just show us that's where they're going.

A lot of trouble with the transport stations sometimes, he had don't have time to write you a receipt, they don't have time to log the waste in. You can stay there until they give you one, or just make a note on your own records that you keep in a file.

Almost all universal waste is going to recycling. The only
exception is PCB ballasts and debris can even be recycled to an extent.

And the standards were tailored specifically for the wastes. So all of these, like I said, are contained within a physical product. There's no liquids that you can pour into something else. It's all within something. And that's the way it has to statement of you can't break it, you can't take it apart -- has to stay. You can't break it, you can't take it apart, to a smaller CRP, you can't take a piece of plastic off the CRP and bring the glass. Anything that is part of the treatment or manufacture.

There is only two types of commercial universal waste generator. Large quantity and small quantity. The key number is 200 items on site at any one time. So you can go in and out of it. You can be 150 quantity. And you are a small days as soon as you hit that 200, the only additional requirement is that you do a weekly inspection on the containers.

Your option as generator, you can send them only downstream towards the recycler. You can't go from you generator to a generator. Which may or may not be facility owned. So if you have several boat yards you can consolidate your universal waste at one of them. You just let us know that's what it likes to do. You can have pickups at one location, but it always has to be moving forward as was shown in this flowchart.

All generators are prohibited from disposing, diluting, or
treats universal wastes.

Universal wastes are prohibited from being sent to other than a central accumulation facility, consolidation facility, or recycling facility. And the only exception to that is residues from the mercury spill kits and ballasts may go for disposal or treatment. That's fine as well, just make sure it's following the hazardous waste rule. If it is easier for you to say, look, everything is a hazardous waste, that's fine.

Storage requirements. There is a handbook for universal waste available as well as a short piece that takes the handbook and breaks it down into a single page of requirements.

They got to be in closed container with good condition, there can be holes in it, ripped, and it should be compatible with the weight.

Mark these containers with accumulation start and full dates. And the weight.

I can see what is going on on inspection. I can see the labels, I can see how long things have been on site. This is the same as the hazardous waste side. Make sure things are stored where you can actually inspect them.

So locked storage is a requirement. However, it doesn't have to be a locked space within your facility. If your facility is closed at night and is locked down, that's locked. If you have it outside in a shed, there should be a lock on it.

And the weekly inspections are for 200 items or more at the
large generator waste level.

You have to maintain inspection logs for a year. They should have all the inspector's name, date of inspection, condition of containers, actions taken if any, if there was a problem.

And the number and type of universal wastes. You should have a running tally of how many universal wastes are on-site. That keeps you from going over to 200, if you don't intend to.

Ship within one year of the accumulation start date, unless you haven't filled a container, and the specific amount that can be collected prior to the one year -- and you can extend over one year as long as you are not above the letter. So first year, if no more than a 4x4x4 Gaylord. For lamps, no more than 190 lamp. Thermostats, 30 gallon or less. Mercury thermometers, 1 gallon or less size container. If it takes you 25 years to fill up a container, that's fine. But when it's full, get rid of it.

Each container needs to be marked specifically with the waste type. So if it's a box of lamps, that says waste lamps on it. You have to have a sign which we have available that says universal hazardous waste storage area. Or if it is specifically a lamp storage area, you can put up something that says waste lamp storage. That's all you need for that. Again, it can be printed out from a computer, written on a piece of paper, as long as there's a sign there.
Packing materials to be used in all containers prior to shipment so that they don't break. Adequate packing materials, as indicated by the fact that it made it to the zone without breaking. If it breaks on the way, it wasn't adequate.

Seal the container when it's full with tape. Don't store the universal waste over five feet tall, as far as -- you could put it on a shelf that's five feet up, but don't stack boxes or materials five feet high. And what we're trying to avoid there is the compression problem with the weight on top of the box.

It should be an inside dry storage area.

There are some variances for full facility relamps. So if you are going to generate a thousand lamps, you can do that without -- if you go through the Green Lights program, they have you indicate whether or not you are saving energy, and you can get some allowances for not complying with the universal waste rules.

Batteries are actually covered under the federal universal waste rules. You won't find them specifically listed in our rules except for a small blurb has says make sure you are complying with the federal side of it.

As a small universal waste generator, you can avoid the paperwork that you have to do by sending your stuff to a central accumulation facility or consolidation facility where they will fill out a log for you that will have your name, how many lamps, how many CRT's, and they will give you a copy of it. And they
are actually required to send out quarterly reports on who they received lamps from. They will also be able to store your training and recycling certificates at their site for -- if we can ask you for them and you say you use such and such consolidation facility, we can go there and say, okay, we want to know if this boatyard has been bringing their stuff to you, and they should be able to bring all that.

All universal waste generators are supposed to train their employees on proper management. Not just Large Quantity. All of your employees who have responsibilities for universal waste management should be trained to the levels they are required to manage universal waste.

If you are a Large Quantity Generator, you are going to let us know that. In the back of the handbook there is a notification form that tells us that you are going to be a Large Quantity Generator. If you are going to establish a central accumulation facility, there are guidelines in the handbook as well. Handbooks are available online, or just give us a call and we can send you some in the mail.

Maintain your inspection log for at least a year, your training records for three years, all of your paperwork for shipment involved in manifests for at least three years, and your certificates of recycling for three years.

So the small universal waste generator, these are your alternatives. You can log at the central accumulation
facilities. There is a recommendation for weekly inspection, trying to keep on top of things, keeping your account up to date, and having your training and recycling certificates stored off-site. That is small universal waste only. Large universal waste generally have to maintain their own paperwork.

Cleanup spills and discharges. Notify the state. We have an exemption for breakage of lamps of 10 items in an occurrence. So if you knock a box over, it gets run over, there's only 10 lamps in there, you can sweep it up, clean it up, manage that debris as universal waste. Anything above 10 in a single incident has to be managed as hazardous waste.

Shipping requirements. Everything has to be sent off whole, intact, unbroken, unless they are at the 10-incidental breakage level.

Proper packaging, use bill of lading, manifest or log. Licensed hazardous waste transporter, a solid waste transporter or common carrier, or self transport. And universal import and export, just follow specific requirements of universal waste management.

You must send us copies of the UBOL or manifest within seven days of shipment or quarterly report from your central accumulation or consolidation facility.

These are reference slides which shows you where the rules are contained.

And that concludes the universal waste Webinar.
Julie Churchill: I will follow up with just a brief talk on managing the environmental footprint. It is a very brief presentation summary of how -- (off mic) -- that I have learned from working with both facilities, builders and repairers over the years.

First of all, I want to let you know that if you come in the office, Beth and I in our office help businesses, municipalities comply with regulation. If you want to talk about hazardous waste, you can also call our office. We have a partner in the Department of Economic and Community Development. We can work with them on economic packages and business plans and that kind of thing.

We can basically do a review of what regulations may and may not apply and provide step by step permitting guidance as well as future prevention guidance.

I just want to go over a few of the best management practices, mostly pertaining to boat building re, repairers, marinas. You oops very quickly these chemicals can be forgotten about and they end up becoming past their expiration date and are hazardous waste. They are expensive to buy, so you are doubling your cost.

You will look at the objectives and align your purchasing with that.

So one thing I've found is there's often a disconnect between the environmental management at a boat facility and the
purchasing department. It is very important that you guys communicate what your needs are and make sure you are getting adequate production, but not too much, because there's a good deal of vendors saying we can give you a good deal on this if you buy this amount. Be careful about those kinds of issues.

And training your line staff on mixing up your resins and so forth. Really work with them and have them take leadership on only mixing up what they need so you don't end up with evaporation issues, waste materials that are very costly to you.

So it's very important, that communication.

And again, utilizing the compliance tool that we talked about earlier this morning, the Air Compliance tool. Either use it electronically or develop your own manual tool.

Remember to always enclose, cover and contain where you are doing any kind of abrasive, where you can get into some kind of air exposure issues.

There are alternative paint removal techniques that some of the boat builders may be using, wet abrasive blasting, dustless sanders. And I think all of you are moving towards lower VOC gel coats and where you can consider lowering them more.

And we talked about the methylene chlorides, there are alternatives for that, so consider less toxic and less volatile chemicals.

And again this is all about pressure washing. We want to try to capture and recycle as much as you can. We didn't talk
about storm water today. We probably have future Webinars on that. We want to make sure that material is not leaving your site versus storm water, or getting into the public water system.

And segregate your conditionally-exempt wastes for recycling. Ensure that you are not combining hazardous waste with non-hazardous because then it becomes a hazardous waste. I highly recommend if you are a marina or a boat repair facility, where you have do-it-yourselfers on-site, I know they are really hard to manage, like the doctors in the laboratories -- they like to order a bunch of chemicals and maybe not use it, and then it becomes real waste.

So you may want to consider, and I will be happy to even put one together, but something you could hand out to do-it-yourself'ers on managing their materials and wastes.

We talked about waste gasoline. One thing you need, I would really encourage all of our boat builders in Maine, in the invoice on repairing, have a line item for all your materials, waste materials, whether it is recyclables or what have you, whatever is a cost to you, include it in your invoice, such as the waste gasoline. I put up some example language. You may want to put, "Waste gasoline is a hazardous waste and must be managed in accordance with state and federal regulations. The following fee ensures your waste gasoline will be properly managed and disposed of."
I put -- obviously, $4 is probably a low number here, but
sometimes a drum of waste gasoline is approximately $400. It
just depends. Make sure you are using a collection fee to cover
your costs.

And some other opportunities. Make sure you have
spill-containment materials close to your fueling docks and
launch sites, whether you have an SCP plan or not. It's a great
practice and will save you a lot of heartburn and money in the
long run.

Prevent Bilge contamination by.

Keeping oil-absorbent pads in the bilge.

Do not store oil or chemicals near doors, openings, what
have you. Those can be spilled, and get run over by a truck,
and could very quickly end up outside and you end up with a real
major spill to have to deal with.

So make sure you have spill kits by those, if you have any
near doorways.

I have a couple more. This one is really key. Some of the
best boat builders that I have seen in Maine as far as being
able to manage their whole facility, they include a couple --
everyone from management, the line staff, the production staff,
and you really want to revisit this list, and look for
efficiencies that save you on chemicals and resources, even
including energy. A lot of times, the line staff have the best
ideas, to come up with innovative things. So you can generate a
list of ideas, document it for your team, maybe post it somewhere, and look for value-added processes, you know? Is there something that is going to make your product even a better product, worth more money, and maybe there's a lowering of -- there's a step that they don't have to take to add value into the product.

Document improvements and results and post those somewhere so employees really feel like they are a part of your business and your success.

And one thing that some of those businesses have done in Maine, they have had incentives and reward for employees to contribute to success. Whether it is even a parking spot, a recognition -- it doesn't have to be high-dollar, but they are recognized and rewarded.

And then, one thing that has been very successful in different areas on the coast of Maine is, we've had formations of what we've called co-op where not only environmental regulatory information is shared but other HR and other things. It's a really great way for boat builders to share ideas, share compliance. You might have one that has just finished lessons learned, what to do, what not to do. Set up a regular meeting time. Maybe fall and spring and summer are really busy, maybe you will have a couple in the winter, maybe one later fall, one mid winter, one before you start launching boats.

And then consider, within this co-op, having an audit. It
would be free for all of you. You could audit each other for environmental compliance or what have you. Pick a topic -- for OSHA, for environmental. It's a great way to share resources.

So, I think we're just about at 12 or right after. This is my information. I'd loving to hear from you. We do have a table out in the main area, and we are going to be moving the laptops there, we will have the air compliance tool up. If you have any questions for Rick or Eric or Ed, or Beth or me, we'd love to have you talk to us.

I want to document really good questions, and we will provide answers. We will also put them up on our Web site, once we load the Webinars up onto the Web site. You can go back and visit the Webinars and look at the questions and answers. So thank you all for coming.

[APPLAUSE]

(Concluded at 12:05 p.m.)