

Compliance Assistance

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County Environmental and Waste Enforcement

Special Investigations and Oversight Unit

I'm From The Government, And I'm Here to Help...



Compliance Assistance

- “Welcome Wagon”
 - Visit by DEP inspector within 6 months of receiving USEPA Identification Number.
- GreenStart
 - Request assistance from DEP for help with Solid & Hazardous Waste, Water, Air, Pesticides, RTK & TCPA.
- School Chemical Management Project
 - Visit by CEHA agency to examine laboratory storage & disposal practices.
- Generator Seminars
 - Held twice per year to provide training on hazardous waste, universal waste and used oil.
- Compliance Advisories & Warnings
 - Posted to web site & automatically e-mailed to subscribers.

“Welcome Wagon”

- USEPA provides monthly listing of newly issued identification numbers. These are researched by DEP to determine if actually new generators or simply a name change.
- Within 6 months of receiving notice an inspection is conducted by DEP.
- Violations are not cited with a Notice of Violation unless egregious or deliberate.
- Follow-up inspection is conducted within a year of initial inspection to confirm compliance.

GreenStart

*A Compliance Assistance
Program for Small Businesses,
Municipalities, and Schools*

What is *GreenStart*?

- A free multimedia compliance assistance program
- To help small businesses, municipalities, and schools understand compliance requirements for:
 - Air
 - Water
 - Pesticides
 - Right-to-Know
 - Hazardous and Solid Waste
 - Toxic Catastrophe Prevention Act



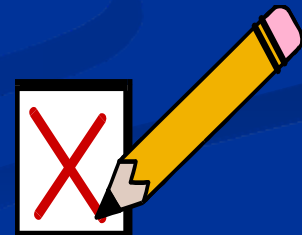
Who is eligible?



- Small business with <100 employees
- Municipalities
- Schools!
- No ongoing enforcement action with DEP

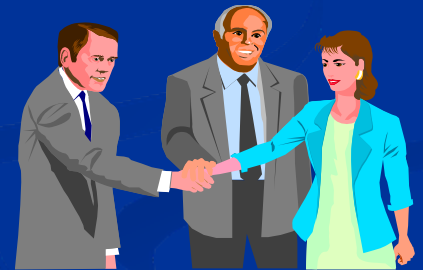
How does it work?

- Submit an application to DEP indicating type of assistance
- DEP will contact you to schedule a visit
- DEP conducts the on-site visit
- Compliance is discussed during consultation
- Final report with detailed findings given to facility
- Free follow-up visit if necessary



What can *GreenStart* do for your facility?

- Help you achieve compliance
- Prevent Environmental liability
- Establish contacts within DEP



More *GreenStart* advantages?

- Assist with Best Management Practices (BMP's) in other areas
- Understanding of regulatory obligations/self audit
- 90 day grace period for violations unless serious/egregious nature


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GreenStart

A Compliance Assistance Program for Small Businesses, Municipalities, and Schools

GreenStart is a **FREE** multi-media compliance assistance program to help small businesses, municipalities, and schools interpret environmental regulations and evaluate compliance requirements in the areas of air, water and pesticides pollution control, solid and hazardous waste management, Right-to-Know, and Toxic Catastrophe Prevention Act. Submit your application to the DEP, we will review your eligibility and needs, and an inspector will be in touch to schedule a site visit.

Benefits of **GreenStart**:

- FREE Site-visit
- Comprehensive follow-up report with compliance plan
- Free follow up visit
- 3 month grace period for most violations found during consultation
- Develop contacts with DEP
- Achieve compliance



GreenStart

[Application](#)
[Brochure](#)
[Frequently Asked Questions](#)

If you have questions about

For More Information on GreenStart contact:

NJ Department of Environmental Protection
Office of Local Environmental Management

Julie Townsend (609) 292-1305

E-mail: greenstart@dep.state.nj.us

Website:

www.nj.gov/dep/enforcement/greenstart.htm

School Chemical Management Project

- **Cost-free inspections & follow-ups by County Health Departments and/or NJDEP**
- **Addresses Best Management Practices for chemicals, pesticides use & universal waste**
- **Final report with detailed findings**
- **Assistance with waste disposal**

County Health Departments Participating in School Chemical Program:

- Bergen
- Burlington
- Camden
- Cumberland
- Essex
- Gloucester
- Hudson
- Hunterdon
- Mercer
- Middlesex
- Monmouth
- Passaic
- Salem
- Sussex
- Union
- Warren

MAY 24 2008

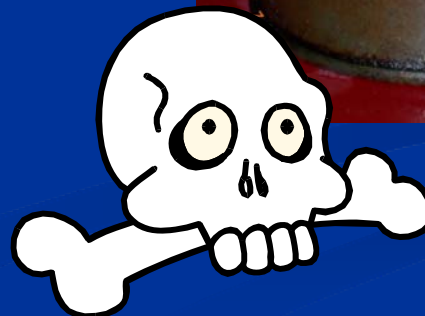
Benefits

- Improve the health & safety of the local school population
- Saves the schools money on the amount of chemicals purchased, on packaging and disposal.
- Prevents environmental liability



Dangerous Items Still Being Found In Unsecured Areas:

- CARBON DISULFIDE
- ETHYL ETHER
- LITHIUM METAL
- POTASSIUM METAL
- PICRIC ACID
- PERCHLORIC ACID
- MERCURY



One High School Inspection:

- Chemicals put in cardboard boxes by teachers & students and brought to school maintenance
- Rolled across the street to self-storage units
- Leaking/broken bottles - reacting with other chemicals inside metal self-storage units
- Storage problems throughout the school
- Spills, chemical reactions
- Immediate clean-up action - cost school over \$30,000 to remove the waste materials.

Examples of Storage Problems:



More Improper Storage:



*Corroded Vent Above
Metal Storage Cabinet:*



Still Finding Mystery Containers:



Potential Hazards:

- No anti-roll edges:



- Cluttered eyewash station:



Unsafe Conditions:

- Stacked chemical bottles:



- Food in chemical storage refrigerator:



Unsafe Conditions:

- Storage above eye-level:
- Opened ethyl ether-removed by DEP:



Careless Storage:

- Food in chemical storage refrigerator:



- Unidentified containers:



Danger to Students:

- Broken thermometers stored in open hood:



- Liquid mercury in unlocked cabinet:



Top 10 Violations:

1. Not marking materials with the date on which they were received.
2. Storing incompatible chemicals together.
3. Maintaining more than 2 years of chemical supply in storage.
4. Storing concentrated acids and bases together.
5. Not isolating, or properly storing concentrated oxidizers.
6. Storing chemicals above eye level.
7. Not properly labeling containers with chemical name, C.A.S. number, and concentration.
8. Not labeling storage cabinets with the hazards contained within.
9. Not posting emergency telephone numbers and emergency plans.
10. Using improper shelves, which do not prevent containers from sliding or rolling off.

*Fire in High School Chemistry Lab,
North Carolina, November 2006*



*The School Building Was
Completely Destroyed*





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Compliance Assistance - Compliance Assistance Pilot Project

Compliance Assistance Pilot Project



CEHA COUNTY AGENCIES

COMPLIANCE ASSISTANCE PILOT PROJECT CHEMICAL MANAGEMENT IN PUBLIC SCHOOLS



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In 2007, the following CEHA counties, with grant funds made available by NJDEP's County Environmental Health Act program, are participating in an ongoing pilot project to conduct compliance assistance visits at 10 to 20 schools within their county: Bergen, Burlington, Camden, Cumberland, Essex, Gloucester, Hudson, Hunterdon, Mercer, Middlesex, Monmouth, Sussex, Union and Warren.

The purpose of this project is to address chemical management practices and pesticides use throughout public school

For More Information on School Chemical Management Project contact:

NJ Department of Environmental Protection
Office of Local Environmental Management

Julie Townsend (609) 292-1305

E-mail: greenstart@dep.state.nj.us

Website:

<http://www.nj.gov/dep/enforcement/cehacountyinitiative.html>

Generator Seminars

■ Held Twice Per Year

- March 2006 – Lyndhurst, NJ
- November 2006 – Robbinsville, NJ
- May 2007 – Camden, NJ
- May 2008 – Robbinsville, NJ
- September 2008 – Robbinsville, NJ

■ Free

- Cover Basic & Advanced topics on hazardous waste, universal waste, Class D recyclables & used oil.

Compliance Alerts, Warnings & Updates

Enforcement Alerts - *anticipated enforcement activities*

Enforcement Alerts highlight areas of concern within the DEP where some change will likely result in increased observation of non-compliance and/or more strict enforcement. The change might be a new or modified rule, a shift in DEP policy, or a targeted effort to address a specific environmental issue. By heeding a Enforcement Alert, you may be able to get ahead of the change and avoid non-compliance as well as an associated potentially strict enforcement approach.

Warnings - *emerging patterns of non-compliance*

Compliance Advisory Warnings highlight non-compliance issues experienced by others. These problems may be common or recurring or they may be newly emerging serious problems. By heeding Compliance Advisory Warnings you can benefit from the experiences of others and avoid common mistakes. Widespread response to Warnings may prevent an issue from rising to the level of an Enforcement Alert where DEP must initiate new steps to address a problem.

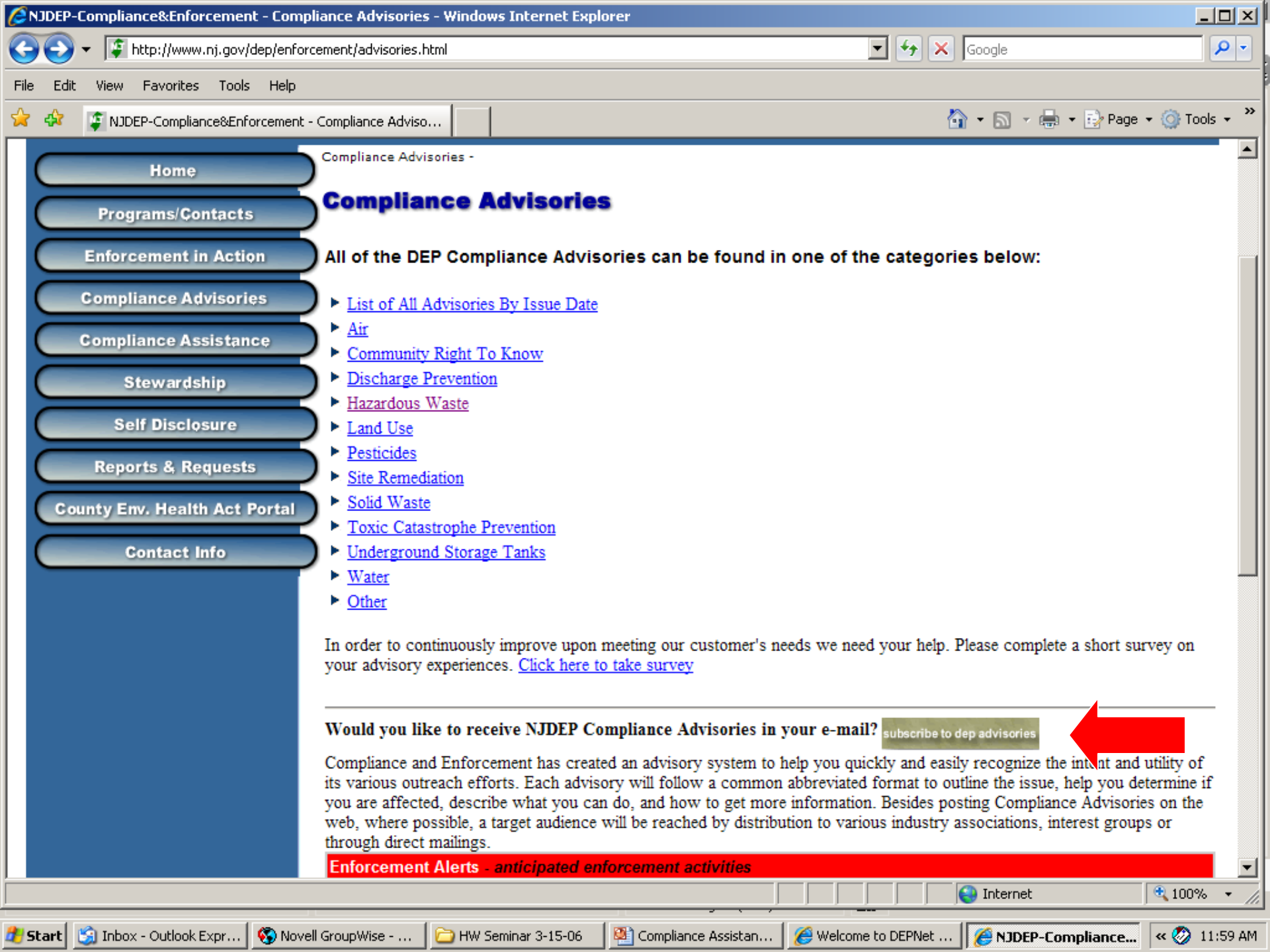
Updates - *incentives and compliance assistance opportunities*

Compliance Advisory Updates highlight an opportunity to improve compliance on your own, reduce your liability or potentially avoid regulation altogether. Compliance Advisory Updates will list the benefits of specific incentives, initiatives, programs and tools as they become available.

- Posted to web site

<http://www.nj.gov/dep/enforcement/advisories.html>

- Automatically e-mailed to subscribers



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Compliance Advisories -

Compliance Advisories

All of the DEP Compliance Advisories can be found in one of the categories below:

- ▶ [List of All Advisories By Issue Date](#)
- ▶ [Air](#)
- ▶ [Community Right To Know](#)
- ▶ [Discharge Prevention](#)
- ▶ [Hazardous Waste](#)
- ▶ [Land Use](#)
- ▶ [Pesticides](#)
- ▶ [Site Remediation](#)
- ▶ [Solid Waste](#)
- ▶ [Toxic Catastrophe Prevention](#)
- ▶ [Underground Storage Tanks](#)
- ▶ [Water](#)
- ▶ [Other](#)

In order to continuously improve upon meeting our customer's needs we need your help. Please complete a short survey on your advisory experiences. [Click here to take survey](#)

Would you like to receive NJDEP Compliance Advisories in your e-mail? [subscribe to dep advisories](#)

Compliance and Enforcement has created an advisory system to help you quickly and easily recognize the intent and utility of its various outreach efforts. Each advisory will follow a common abbreviated format to outline the issue, help you determine if you are affected, describe what you can do, and how to get more information. Besides posting Compliance Advisories on the web, where possible, a target audience will be reached by distribution to various industry associations, interest groups or through direct mailings.

Enforcement Alerts - anticipated enforcement activities

Internet

100%

Navigation and toolbar area of the browser showing address bar, search bar, and various icons.



New Jersey Department of Environmental Protection

COMPLIANCE ADVISORY

Enforcement **Alert**

Making You Aware of Anticipated Enforcement Activities

Compliance and Enforcement	Issued: August 2006	#2006-10
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Hazardous Waste Generators Required To Use New Federal Manifest

Who is affected by this initiative?

Any company/business that generates hazardous waste (based on either the exhibition of characteristics such as ignitability, corrosivity, reactivity or because the waste is listed in the Code of Federal Regulations as a hazardous waste) and is required or chooses to use a hazardous waste manifest for shipment of waste offsite for treatment or disposal.

What has changed?

On March 4, 2005, the United States Environmental Protection Agency (USEPA) adopted significant changes to its Uniform Hazardous Waste Manifest regulations, the manifest form, and continuation sheet forms used to

Important Phone Numbers

- DEP Hotline: 1-877-WARNDEP
- Southern Field Office: 856-614-3648
 - Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester & Salem
- Central Field Office: 609-584-4180
 - Mercer, Middlesex, Monmouth, Ocean & Union Counties
- Northern Field Office: 973-656-4470
 - Bergen, Essex, Hudson, Morris, Passaic, Somerset, Sussex & Warren Counties