Update: EPA Solvent-Contaminated Wipes Rule



- EPA Final Rule issued July 31, 2013.
- Provides reduced requirements for:
 - Wipes that are sent for laundering & reuse.
 - Wipes that are sent for disposal.
- As a less-stringent rule, it is not yet in effect in Connecticut.

EPA Solvent-Contaminated Wipes Rule

- DEEP needs to evaluate the rule.
- Provisions in DEEP's Industrial Rag Handling fact sheet remain in place for now (copy on DEEP website).



Update: iCOMPASS

- Survey Monkey survey launched October 2012:
 - HWAC member email.
 - LQG email.
 - SQG email.
- Responses received from 10/25/12 until 12/4/13.
- Total responses: 181.

Do you think you would use iCOMPASS if	it became available?	♦ Download
	Response	Response
	Percent	Count
Yes	75.1%	136
No	5.5%	10
Not sure	19.3%	35
	answered question	181
	skipped question	0

the Associated Secretarial												
On a scale of 1 to 10 (1 being willing to spend using iCOMPASS		e time ar	nd 10 bei	ng a lot o	f time), h	ow much	time wou	uld you b	oe .	& Cre	ate Chart	Download
	1-	2	3	4	5	6	7	8	9	10 -		
	very									a lot	Rating	Rating
	little									of	Average	Count
	time									time		
	5.0% (9)	8.3% (15)	12.7% (23)	13.3% (24)	26.5% (48)	12.2% (22)	9.4% (17)	8.3% (15)	1.7% (3)	2.8% (5)	4.93	181
									í	answered	l question	181
										skipped	d question	0

What format would you prefer for iCOMF	ASS? Create Chart	♦ Download
	Response Percent	Response Count
An on-line tool that could be used on the Internet.	59.8%	107
Software that could be downloaded or sent via mail.	5.0%	9
Either format is OK.	33.0%	59
Another format (please specify): Show Responses	2.2%	4
	answered question	179
	skipped question	2



4. On a scale of 1 to 10 (1 being be able to go back to iCOMPASS							portant	would it b	e for you	to 🕓 Cre	ate Chart	Download
	1 - very unimportant	2	3	4	5	6	7	8	9	10 - very important	Rating Average	Rating Count
	2.3% (4)	1.1% (2)	1.7%	0.0%	2.8% (5)	1.7%	7.9% (14)	18.1% (32)	11.3% (20)	53.1% (94)	8.67	177
										answered	d question	177
										skipped	d question	4

Do you have data security concerns about using iCOMPASS? apply.)	' (Select all that Select Chart '	♦ Download
	Response Percent	Response Count
I am concerned about people getting access to confidential business information.	63.8%	104
I am concerned about people getting access to information about chemical storage and usage (terrorism/national security issues).	59.5%	97
I am concerned about DEEP deciding to conduct an inspection based on my using iCOMPASS.	55.2%	90
Other concerns (please specify) Show Responses	11.7%	19
	answered question	163
	skipped question	18

	6. Do you know what your hazardous waste	generator status is?	Create Chart	Download
MINIMA MINIMA			Response Percent	Response
	Yes - Large Quantity Generator		51.4%	93
	Yes - Small Quantity Generator		34.8%	63
	Yes - Conditionally Exempt Small Quantity Generator		4.4%	8
	No, I don't know what my hazardous waste generator status is.	ı	1.7%	3
	Not applicable - I am not a generator of hazardous waste.		7.7%	14
		answe	red question	181
		skipp	oed question	0

7. How does your company or organization manage environmental compliance Create Chart Download issues, including hazardous waste? Response Response Percent Count We have staff whose jobs are dedicated to 46.4% 84 environmental compliance issues. Environmental issues are handled by staff who have other duties as their primary job 21.0% 38 task. We use outside contractors (e.g., consultants) to manage our environmental 15.5% 28 compliance issues. Not Applicable - we do not generate 5.5% 10 hazardous waste. Other (please specify) 11.6% 21 Show Responses answered question 181 skipped question 0



8. On a scale of 1 to 10 (with 1 be (or your clients) have properly pe						ident) ho	ow confid	lent are y	ou that y	ou 🕓 Cre	ate Chart	♦ Download
	1 - very unconfident	2	3	4	5	6	7	8	9	10 - very confident	Rating Average	Rating Count
	0.6% (1)	1.1% (2)	0.6%	0.0%	3.4% (6)	2.3% (4)	5.1% (9)	13.0% (23)	31.1% (55)	42.9% (76)	8.84	177
										answered	d question	177
										skipped	d question	4



9. On a scale of 1 to 10 (with 1 being very unconfident and 10 being very confident), how confident are you that you (or your clients) are in compliance with hazardous waste requirements in general?											Download	
	1 - very unconfident	2	3	4	5	6	7	8	9	10 - very	Rating Average	Rating Count
	0.0% (0)	0.0%	1.7%	0.0%	3.4% (6)	1.1%	4.5% (8)	15.2% (27)	28.7% (51)	45.5% (81)	8.94	178
										answered	d question	178
										skipped	dauestion	3

10. Are there particular topics that you think iCOMPASS should address all that apply)?	(check Create Chart	♦ Download
	Response	Response
	Percent	Count
Hazardous waste testing/determinations.	80.3%	139
Container management.	64.2%	111
Tank management.	35.8%	62
Hazardous waste inspections.	72.3%	125
Personnel training.	74.0%	128
Emergency planning/contingency plan.	61.8%	107
Hazardous waste recycling.	65.3%	113
Universal Waste.	69.9%	121
Used oil.	60.7%	105
Non-RCRA-hazardous waste (Connecticut-regulated waste).	77.5%	134
Special Waste.	40.5%	70
Asbestos.	22.5%	39
Other (please specify) Show Responses	8.1%	14
	answered question	173
	skipped question	8

Create Chart 🔻 Download 11. Do you think there would be a benefit to having iCOMPASS available in languages other than English? Response Response Percent Count Yes. 18.8% 33 81.3% 143 No. If you answered "yes" please specify which language(s) 22 Show Responses 176 answered question skipped question 5

Question #12 Additional Comments

- Upload manifests?
- Bulletins <u>re</u> HW reg changes, etc.
- Help with Tier 2 reporting?
- Put in a comments section for users.
- Change facility info with DEEP.
- List of HW treatment/disposal facilities.
- Make available as a mobile ap?
- Links to DEEP interpretive letters, guidance documents.
- Sample forms, plans, checklists, etc.

Question #12 Additional Comments (Cont.)

- Work with multiple locations (possibly with different generator status).
- FAQs.
- Option to get a call back from an inspector.
- List training opportunities.
- Manage waste streams in real time.
- Report of applicable requirements with links for further info.
- Ability to run "what if scenarios."

Question #12 Additional Comments (Cont.)

- Access to past data.
- A way to ask questions confidentially.
- Make sure it's clear and concise.
- Security concerns.