

Regulatory Overview of MCP Remediation Waste Management: Regulations and Practical Applications

Workshop Description and Outline:

The purpose of this workshop, to be held jointly with the LSP Association, is to discuss regulatory requirements and common problems encountered when preparing and shipping remediation waste from MCP sites. The workshop will focus on the new electronic Bill of Lading (BOL) Process, interpretation of the anti-degradation requirements of the MCP, and priorities and pitfalls of pre-characterization, transportation and disposal. A single case study will be developed and presented to illustrate specific practical applications of the regulatory requirements.

The primary agenda will be presented by Mr. Paul Locke, Director of Response and Remediation in the Bureau of Waste Site Cleanup and Mr. J. Andrew Irwin, PE, LSP, CPEA, President of IRWIN Engineers, Inc. and former LSP Association President. LSP Association Regulations Committee Co-Chairs Dot McGlinchy and Marilyn Wade will also contribute to the presentation and moderate the session.

Workshop Schedule and Outline:

Introduction (Marilyn Wade/Dot McGlinchy) 3:00 – 3:10 PM

The introduction will provide a 10 minute overview of the course, the bios of the presenters, and a brief outline of the case study that will be used throughout the presentation.

Remediation Waste Regulations Overview (Paul Locke) 3:10 – 3:50 PM

This presentation will provide an overview of the MCP remediation waste regulations, with a focus on solid wastes, soil above RCs, soil below RCs, soils exempt from MCP reporting. Presentation topics may include a regulations-driven decision tree for solid waste and soil disposal options, a primer on the new electronic BOL process, regulatory and practical implications of the anti-degradation principles, and an updated look at DEP policies (including WSC 00-425 and COMM 97-001) with an eye towards streamlining soil management when the bulldozers are ready to roll. The case study introduced in the opening session will be used as needed to illustrate the regulatory implications in specific examples or situations.

Solid and Hazardous Waste Regulations Overview (Paul Locke and Andy Irwin) 3:50 – 4:10 PM

This presentation will provide an overview of the definitions and regulations governing federally regulated hazardous waste under the Resource Conservation and Recovery Act (RCRA) as well as waste management of common materials encountered at MCP construction sites (Asphalt, Brick, Concrete waste; asbestos containing materials, PCBs). The case study introduced in the opening session will be used to illustrate specific examples or situations where MCP remediation waste can be drawn into the regulatory requirements of these related waste disposal programs.

Case Study: Soil Management at MCP Sites (Andy Irwin)

4:10 -4:30 PM

Building on the previous two regulatory framework presentations, this presentation will track the previously introduced specific case study from pre-characterization through ultimate disposal, posing “what-if” questions at each decision point. This presentation will give the audience a real life example of how to implement MCP remediation waste management in accordance with state and federal regulations. The presentation will also cover the topics of managing listed RCRA wastes vs. RCRA characteristic wastes, and the pros and cons of pre-characterization vs. soil stockpile characterization.

Top 10 List –How to Improve Soil Management under the MCP

4:30 – 4:40

PM

(Marilyn Wade/Dot McGlinchy)

The presenters will wrap up the topic by providing in “top 10 list” format, practical tips from waste disposal vendors, waste transporters, MassDEP and LSPs on how to improve the BOL and soil management process at MCP sites.

Questions & Answers

4:40 – 5:00 PM

MassDEP Trainer:

Paul Locke, Director of Response and Remediation, Bureau of Waste Site Cleanup
Please see biography below.

LSP Association Trainers:

Andy Irwin, Past President and Board Member, LSP Association

Dot McGlincy, Regulations Committee Co-Chair

Marilyn Wade, Regulations Committee Co-Chair

Please see biographies below.

Presenter Biographies:

Paul W. Locke

Mr. Locke has been with the Massachusetts Department of Environmental Protection (MassDEP) since 1987 and is currently the Director of Response and Remediation in the Bureau of Waste Site Cleanup. In this role Mr. Locke oversees the development and implementation of regulations governing the state's privatized cleanup program, including the proposed soil and groundwater standards for perchlorate. As past head of the Department's Risk Analysis Group, he developed rules on characterizing human and environmental risks at waste sites and was co-author of the Department's Guidance for Disposal Site Risk Characterization.

Currently Mr. Locke is overseeing a comprehensive re-evaluation of the state cleanup standards and changes to the way MassDEP regulates asbestos in soil. Mr. Locke holds a Bachelor's degree in Chemistry from Harvard College and a Master's degree in Civil Engineering from the Tufts University program in Public Health.

J. Andrew Irwin, PE, LSP, CPEA

Mr. Irwin is President of IRWIN Engineers, Inc. and has 29 years of experience in environmental engineering consulting. In this consulting role he has been responsible for managing hazardous waste site assessments and cleanup and regulatory compliance for industry including RCRA TSDF Permitting and Facility Closures, management of building PCB decontaminations and PCB spill cleanups, closure of petroleum and CERLA hazardous substance underground tanks, waste water treatment and discharge permitting, and air pollution control and emissions permitting. He also is past president of the LSP Association.

Mr. Irwin holds a Bachelor of Science degree in Chemical Engineering and a Master of Engineering in Chemical Engineering both from Cornell University. He is a practicing LSP and a licensed Professional Engineer in MA, NY, CT and RI. He is also a Certified

Professional Environmental Auditor (CPEA) recognized by BEAC for regulatory compliance and ISO14000 environmental management systems.

Dorothy McGlincy, LSP

Ms. McGlincy, a past President of the LSPA, has worked in the environmental field for over 20 years in the corporate environmental compliance department of a New England utility, in state government, and most recently, as a consultant serving utilities and industrial clients. Her expertise lies in environmental permitting and compliance, coal ash and oil ash management, hazardous waste management, environmental auditing, environmental management systems program development, and risk management services. Ms. McGlincy's diverse experience has given her a unique perspective and background to solve complex environmental problems. She is experienced with state and federal environmental regulations, including CERCLA, CWA, DOT, EPCRA, RCRA, and TSCA. Ms. McGlincy, a geologist, has been an LSP since 1994.

Marilyn M. Wade, PE, LSP

Ms. Wade is a Senior Project Manager and department head for URS Corporation. She has over 30 years of environmental remediation experience, including 6 years as an EPA Remedial Project Manager and more than 20 years in consulting. She has consulted for a myriad of fortune 500 companies and federal agencies, providing waste site remediation investigation, design and construction services. She has lead multidisciplinary teams in remediation at some of the largest and most significant Superfund and state lead waste sites in New England, at portfolios of storage tank and real estate transfer sites and at large scale redevelopments. Ms. Wade's consulting encompasses numerous federal and state programs including solid and hazardous waste, CERCLA, RCRA and TSCA. While at EPA, she received a medal of commendation for significant service and was recognized as a Master RPM. She is currently co-chair of the LSPA Regulations Committee. Ms. Wade has a Bachelor's degree in Civil and Environmental Engineering from Clarkson University and is a registered Professional Engineer in the state of Maine.