October 31, 2011

To Private Equipment Owners:

Subject: Maintenance of Private Equipment at State Facilities

New Hampshire Department of Transportation Bureau of Highway Maintenance (BHM) is implementing improvements to operations to reduce costs associated with handling and disposal of hazardous waste. One of the areas of improvements is associated with maintenance of painted equipment.

We have revised our technical specifications for bulk purchases of coating materials (i.e., primer, paints) and for equipment that is coated by manufacturers. These revisions include limitations on coating ingredients to allow debris we generate during maintenance of our coated equipment to be disposed of as solid waste.

In addition, the BHM is implementing a “carry in carry out” policy pertaining to maintenance of privately owned equipment at state owned facilities. Emergency repair of privately owned equipment may be allowed at state owned facilities on a case-by-case basis. However, based on potential hazardous waste characteristics of waste from privately owned equipment, private equipment owners must immediately remove all waste generated during these emergency repairs from the state facility.

If waste generated during emergency maintenance of privately owned equipment is suspected to be a hazardous waste, the generator (i.e., private equipment owner) is required to notify New Hampshire Department of Environmental Services Reporting and Information Management Section (NHDES RIMS) to establish a temporary EPA Identification Number as the generator at our facility. In order to generate and properly dispose of hazardous waste, NHDES’ RIMS must be contacted at 603-271-2921 to establish the temporary EPA Identification Number when needed. Private equipment owners will be required to provide the following information:

Generator Name: (Private Equipment Company Name)
Site Address: (NHDOT facility address)
Contact Name: (Private Equipment Company Contact)
Mailing Address and Phone Number: (Private Equipment Company Address)
Approximate Weight and Type of Waste: (Generated or Anticipated)

Private equipment operators that generate hazardous waste are required to properly dispose of hazardous waste in accordance with all applicable local, state, and federal regulations. Additional information pertaining to responsibilities of hazardous waste generators may be obtained by calling NHDES’ Hazardous Waste...
Management Bureau at 271-2942. Private equipment owners shall notify the appropriate BHM District office if a temporary EPA Identification Number is established for BHM related work. Private equipment owners shall be responsible for all costs associated with disposal of waste materials.

Thank you again for your dedicated assistance in maintaining New Hampshire’s roadways. Your efforts are appreciated by us and the traveling public.

Sincerely,

Caleb B. Dobbins, P.E.
State Maintenance Engineer

CBD/mrk

cc: Districts 1-6