



The State of New Hampshire  
**Department of Environmental Services**  
 Robert R. Scott, Commissioner

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June 27, 2022

His Excellency, Governor Christopher T. Sununu  
 And the Honorable Council  
 State House  
 Concord, NH 03301

**REQUESTED ACTION**

*Retroactive*

Authorize the Department of Environmental Services (NHDES) to pay the fiscal year 2023 membership dues to the Northeast Environmental Enforcement Project (NEEP), Delaware, OH (VC# 270787-B001) in the amount of \$4,000 for the period July 1, 2022, through June 30, 2023, effective upon Governor and Council approval. 37.5% Federal funds and 62.5% Hazardous Waste funds.

Funding is available in the accounts as follows.

	<u>FY 2023</u>
03-44-44-444010-7603-026-500251	\$1,500.00
Dept of Environmental Services, RCRA HW Program PPG, Organizational Dues	
03-44-44-444010-5392-026-500251	\$2,500.00
Dept of Environmental Services, HW Cleanup Fund, Organizational Dues	
_____	Total: \$4,000.00

**EXPLANATION**

NHDES and the Attorney General's Office (AGO) benefit greatly from membership in NEEP, and the value of training benefits derived from membership far exceed the modest dues. NEEP was formed in 1980 to address the need for interstate cooperation among environmental enforcement officials in the northeast to investigate and prosecute environmental crimes. New Hampshire's membership entity is NHDES, responsible for environmental regulatory activities. The AGO is also represented under this membership, responsible for civil and criminal investigation and prosecution. NEEP provides its members with high-quality training programs and responsive information services that NHDES relies upon to successfully train regulatory and enforcement staff.

Listed below are answers to standard questions required for Governor and Council organization dues and membership approval submissions:

- **How long has this organization been in existence and how long has this agency been a member of this organization?** The organization has been in existence since 1980 and New Hampshire has been a member since its inception.
- **Is there any other organization which provides the same or similar benefits which your agency belongs to?** No.
- **How many other states belong to this organization and is your agency the sole New Hampshire state agency that is a member?** 13 entities representing 8 states and the District of Columbia are NEEP members. NHDES holds the entity membership and under this membership the AGO is also represented and able to take advantage of NEEP's services. NEEP is one of the three Regional Environmental Enforcement Associations,.
- **How is the dues structure established? (Standard fee for all states, based on population, based on other criteria, etc.)** The dues are a structured fee of \$4,000 per state with a population less than 5 million people, \$7,000 for a population between 5 to 10 million and \$10,000 for a population of 10 million or more.
- **What benefit does the state receive from participating in this membership?** The state receives enormous benefits from membership in several ways. The state takes full advantage of the high-quality training programs provided to our regulators, investigators, and attorneys. In 2023, NEEP and NHDES are hosting an in-state training event that provided compliance and enforcement training to New Hampshire and neighboring state employees. In fiscal year 2022, NHDES sent 51 people to NEEP sponsored trainings, equating to \$11,000 worth of training fees for non-NEEP members. NEEP's Board of Directors and Representatives have conference meetings, two per year, which provide up-to-date information on national environmental enforcement issues, information exchange and NEEP business. The networking with NEEP and the other Regional Environmental Enforcement Association members has been an important resource in the success of New Hampshire's environmental enforcement programs.
- **Are training or educational/research materials included in the membership? If so, is the cost included? Explain in detail.** Yes, NEEP provides training materials to its members at its courses and meetings. The courses are free for New Hampshire as a member, and training course attendees are reimbursed for their travel, hotel, and meal expenses when trainings are held in-person.
- **Is the membership required to receive any federal grants or required in order to receive or participate in licensing or certification exams? Explain.** No.
- **Is there any travel included with this membership fee? Explain in detail any travel to include the number of employees involved, the number of trips, destination if known and purposes of membership supported trips.** Yes, NEEP has one to two conference

meetings each year for representatives hosted by a member state. One representative is reimbursed by NEEP for their expenses. For trainings that are held in-person, NEEP reimburses attendees for their travel, hotel, and meal expenses.

- **Which state agency employees are directly involved with this organization? (Indicate if they are members, voting members, committee members, and/or officers of the organization.)**

NHDES Representative

Tyler Croteau, Waste Management Specialist IV, Hazardous Waste Management Bureau – NEEP State Membership Representative/Voting Member/Administrative Committee


AGO Representative

K. Allen Brooks, Senior Assistant AG, Chief, Environmental Protection Bureau

- **Explain in detail any negative impact to the State if the Agency did not belong to this organization.** The state would not have up-to-date information on important state environmental enforcement cases or the ability to network with members of the Regional Environmental Enforcement Associations on multi-state environmental investigations. Most importantly, New Hampshire would lose the opportunity to train its staff through NEEP's training courses and representative conference meetings. The NHDES and AGO have been members of NEEP since its inception and its environmental enforcement programs have benefited and will continue to benefit greatly from the training, networking and other services provided by NEEP. If New Hampshire ceased its membership in NEEP, there is no other organization that could provide a comparable service, and the effectiveness of our environmental enforcement programs would be diminished.

NEEP membership provides New Hampshire with an outstanding service to remain current on new environmental enforcement developments in the regulatory, investigative, and legal specialties. Membership in the past has been of great benefit to New Hampshire as we have been able to learn from other NEEP states' experiences and share such up-to-date information on a national basis with the other Regional Environmental Enforcement Associations. These dues are a very small investment for the value received from this organization in terms of sustaining our knowledge and ability to investigate and prosecute environmental crimes through administrative, civil, and criminal processes.

We respectfully request your approval.



Robert R. Scott  
Commissioner

**Northeast Environmental**

4517 Hyatts Rd.  
Delaware, OH 43015  
(740) 417-9058  
EIN# 22-3787619



**Enforcement Project**

**Bill To:**  
**Tyler Croteau, Used Oil Program Manager**  
**Hazardous Waste Compliance Section**  
**New Hampshire Department of Environmental Services**  
**29 Hazen Drive, PO Box 95**  
**Concord, NH 03302**

Date	Invoice #
05/27/2022	NH HWCS FY23

Quantity	Description	Unit Price	Total
1	<b>FY23 Dues Allocation for Participation in the Northeast Environmental Enforcement Project –</b>  <b>New Hampshire State Contribution (Haz. Waste Compliance Section)</b>  <b>July 1, 2022 - June 30, 2023</b>	<b>\$4,000.00</b>	<b>\$4,000.00</b>
		<b>Total</b>	<b>\$4,000.00</b>