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Pollution Prevention News

EPA

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SPECIAL ISSUE:
Pollution Prevention and the States

Partnering with the States

William H. Sanders, III
Director, EPA Office of Pollution Prevention and Toxics

Across the country, from corporate boardrooms to individual house holds, great strides have been made in pollution prevention over the past seven years since the nation's Pollution Prevention Act was signed. Pollution Prevention (P2) concepts now permeate all aspects of our society, and new ideas for source reduction are being explored and applied to deal with the expanding complexity of the environmental problems we face. State pollution prevention programs represent a great deal of this progress.

William H. Sanders, III

For almost a decade now, EPA has been providing grants to states to support their P2 efforts. The Pollution Prevention Incentives for States (PPIS) program provided early seed funding to help get state P2 programs off the ground. Innovative approaches and demonstration projects showing the

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Pollution Prevention and Beyond

Linda Rimer
Assistant Secretary for the Environment, North Carolina Department of Environment, Health, and Natural Resources

The subject of pollution prevention can be introduced this way: If we don't change our direction, we may end up where we are headed. For a long time we recognized we were headed in the wrong direction in our relationship with our environment. Over the last decade, however, we have risen to the occasion and learned how to emphasize pollution prevention over treatment and disposal.

North Carolina has a long and aggressive history of promoting pollution prevention. We opened the doors of the first state-run pollution prevention program in the nation in 1983. This office is still going strong today. We have helped thousands of public and private sector organizations rethink their pollution problems in terms of prevention.

Linda Rimer

However, we have only begun to meet our challenges in improving environmental quality. Addressing current waste management problems through P2 is only

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Guest Editorials

Dr. Linda Rimer is Assistant Secretary for Environmental Protection with the North Carolina Department of Environment and Natural Resources. She holds a Ph.D. from the University of Illinois, School of Public Health, and previously worked on the EPA Headquarters Pollution Prevention Policy Staff and as pollution prevention coordinator for EPA Region 5.

Dr. William H. Sanders III became the Director of EPA's Office of Pollution Prevention and Toxics in 1995, after serving as Director of EPA Region 5's Environmental Services Division. He holds a Ph.D. in Public Health from the University of Illinois at Chicago.

Pollution Prevention and Beyond

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the first step. Pollution prevention can be the building block upon which other bricks must be laid to build a sustainable structure. Or to use another metaphor, pollution prevention aims only at the fourth outer ring of our target. What are the three inner rings?

The third inner ring of the target is *life cycle analysis,* or product stewardship in a manufacturing operation. Not only should an organization look to prevent waste on site, but it must also consider the environmental implications of its choices from cradle to grave. This consideration could or should include everything from the environmental impacts of extracting raw materials from the earth to product use and final disposal.

The second inner ring on our target is *clean technology*. Pollution prevention tends to function within the parameters of existing operations. But even if we eliminate all pollution associated with a process, life cycle analysis tells us that there still may be environmental impacts both up- and downstream of the operations. If manufacturers and communities are going to truly minimize the environmental impacts of their activities, they must explore cleaner technologies.

The bull's eye for which we are aiming is *sustainability*. Sustainability involves a commitment to long-term economic development as it guides us to the best, holistic environmental solution. Sustainability helps organizations balance their needs with those of the community, environment, and even future generations. Like life-cycle analysis and clean technology, sustainability goes far beyond the impacts of the single organization. It guides an organization to make not just a zero impact on the environment, but to make a positive impact.

These four rings of the target are fundamental to our future as the world experiences continuing stresses from a wide range of environmental issues. In North Carolina, we are trying to move toward sustainability. A range of efforts is underway, from setting long-range environmental goals to exploring environmental management systems. The target is clear; now our aim must be true.

Partnering with the States

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advantages and opportunities of protecting the environment through source reduction began spreading across the nation largely through university-based and other technical assistance activities.

State P2 programs have increasingly become institutionalized within their state environmental protection departments. This represents a critical complement to the early P2 assistance programs. Today, Texas and Indiana are just two examples of P2 programs that have grown significantly in partnership with their state waste, air and water programs. I applaud this increasing effort by states to integrate P2 into their core media environmental programs. The continued success of state P2 programs is dependent on their ability to develop partnerships with their regulatory programs, and to help those programs adopt source reduction techniques to solve environmental problems.

As we move into the 21st century, the practices of the past will be insufficient to deal with the complex environmental issues of our future. State programs, like environmental programs at all levels of government and in all sectors of society, must endeavor to prevent more pollution at the source if we are to sustain our economic development and preserve precious natural resources. EPA is committed to helping our P2 partners in the states in this vital mission.

Integrating P2

Performance P2: A Look at NEPPS

by Ken Zarker, Office of Pollution Prevention and Recycling, Texas Natural Resources and Conservation Commission

Pollution prevention professionals across the country are actively working to incorporate pollution prevention into EPA's National Environmental Performance Partnerships System (NEPPS) to link core environmental performance measures and program outcomes with measurable environmental indicators. Many P2 practitioners are interested in the NEPPS process, since it gives state and local governments and tribes more flexibility to promote multimedia P2 integration based on their own environmental priorities.

What is NEPPS?

NEPPS was established as part of an effort to reform EPA policy and practices related to oversight of state programs. The two elements of the NEPPS are:

(1)Performance Partnership Agreements (PPAs), strategic documents that typically identify mutually established agency-wide priorities, core regulatory activities, and program-based performance measures.

(2)Performance Partnership Grants (PPGs), the delivery mechanism for this new approach. PPGs tie resources to activities, and allow states to target resources to their highest priorities by combining two or more grants into a single, more flexible grant.

As of June 1997, 40 states have signed PPGs for FY97. Currently EPA program managers are working with state environmental commissioners through the Environmental Council of States to develop core performance measures for FY98, including integrating pollution prevention measures. To promote integration, efforts are being focused on increasing the visibility and credibility of P2 programs. These include: establishing P2 as an agency-wide priority in the Pollution Prevention Act; funding pilot P2 projects to demonstrate environmental results; providing technical P2 training for agency staff; encouraging media program to invest in P2 staff; and establishing performance measures that focus on environmental results.

Pilot Projects

Several states have initiated pilot projects that could be funded through the PPA/PPG process.

- Oregon VOC Amnesty Project: If the state finds a facility operating illegally without a permit, it will waive the applicable fines. The facility must apply for a permit during the amnesty period and receive advice on how to avoid or decrease regulatory requirements through P2. Oregon estimates that it has reduced VOC emissions by 20-30 tons as a result of the project.
- Pollution Prevention in Permitting Project (P4): This pilot project in four states will demonstrate how operating flexibility and P2 can be integrated into air permits. [See page 9 below]
- Texas Emissions Inventory Data Project: Texas is using the air emissions inventory to identify facilities at or near regulatory thresholds. The state will approach these facilities with P2 technical assistance to help them drop emissions significantly below regulatory thresholds.

Future Activities

Many environmental programs are working on P2 outcome measures, (e.g., the number of permits issued, the number of P2 site visits, the number of inspections, etc.). While this traditional "bean counting" is useful for tracking program outcomes, there still exists a great need to develop measures that align program outcomes with environmental results. For example, a performance-based outcome measure could be counting the number of permits avoided as a result of P2 technical assistance activities.

Future activities for continuing P2 and NEPPS integration include expanding public involvement in developing and testing new core measures.

Resources:

A ten-state study, *Practical Steps for Advancing P2 through NEPPS,* sponsored by the Pacific Northwest states and EPA Region 10, in affiliation with the National Pollution Prevention Roundtable, offers P2 practitioners a guide to understanding the NEPPS process, strategies for integrating P2 into the NEPPS process, opportunities for furthering regulatory integration of P2 through NEPPS, and performance measures currently contained in several NEPPS agreements. To order, contact the National P2 Roundtable at 202-466-P2P2.

Ken Zarker is Manager of the Strategic Partnership Program at TNRCC's Office of Pollution Prevention and Recycling. He can be reached at 512-239-3145 or via e-mail at kzarker@tnrcc.state.tx.us.

Integrating P2 in Pennsylvania

Pennsylvania Strives For Zero Emissions

Pennsylvania's governor, Tom Ridge, has set the following ambitious mission for the state's Department of Environmental Protection (DEP): "We are now encouraging individuals, local governments and businesses to strive for a 'zero emissions' goal in their environmental programs." Pennsylvania citizens, companies, and local governments have already made significant progress in meeting this goal. Twenty-five companies which received Governor's Environmental Excellence Awards in 1996 have eliminated 2.8 billion pounds of pollution—hazardous and residual wastes, air pollution and wastewater. While DEP recognizes these results, it knows it must go further. In the words of James Seif, Secretary of DEP, "[A] goal of zero emissions requires businesses and communities to make an honest commitment to pollution prevention at its source through continuous improvement to their methods of doing business."

Only companies aggressively pursuing zero emissions goals qualify for the Governor's Awards for Excellence. The St. Mary's Pressed Metals firm, for example, received an award for eliminating all industrial wastewater discharges from its Ridgeway facility. Armstrong World Industries received an award for reducing landfill waste by 91 percent, hazardous waste by 73 percent, volatile organic compound emissions by 70 percent, and NOx emissions by 95 percent.

Letting P2 Sell Itself

Pennsylvania DEP believes that with the proper information and cost accounting, pollution prevention will sell itself to corporate decision-makers without the need for "regulatory flexibility." DEP has developed tools to help companies understand environmental accounting and the savings to be gained through P2. It provides free computer software to simplify the tasks of organizing and analyzing cost data, calculating annual cash flow, and measuring short and long term profitability. DEP has reprinted and distributes EPA's manual, *An Introduction to Environmental Accounting as a Business Management Tool*.

DEP helps its manufacturers make money from their P2 successes. DEP staff led a delegation of 28 Pennsylvania firms to the world's largest international environmental conference and trade show to help sell successful environmental technologies, including P2 methods. The effort matched one company with numerous business opportunities in Latin American and the Pacific Rim. DEP also publishes *$success $tories* fact sheets which describe successful P2 methods, waste stream/chemical process reduction, P2 costs and savings, and other benefits obtained by companies that have reduced pollution or reached zero emissions. One fact sheet, for example, details how GE Transportation Systems, a manufacturer of diesel engines, installed an aqueous cleaning system that annually eliminates the emission of about 100 tons of volatile organic compounds and the off-site disposal of 92,000 pounds of waste. These reductions should save the company $500,000 per year.

DEP has integrated P2 into its overall environmental program through the Pollution Prevention and Site Visit Program. The program offers suggestions for prevention pollution after site visits by air, water, waste and energy experts. Suggestions vary from site to site and may include flow and process diagrams, outlines of environmental management systems, alternate disposal options, preventive maintenance schedules, and financial analysis methods. DEP staff, for example, helped the Sinter Metals firm of Emporium, Pennsylvania develop a closed loop wastewater system.

For more information contact Erica Clayton, Office of Pollution Prevention and Compliance Assistance, Pennsylvania DEP, 717-783-0540, or via e-mail at Clayton.Erica@a1.dep.state/pa.us.

Indiana Integrates Pollution Prevention From the Start

Indiana's Department of Environmental Management (IDEM) has set a high priority on integrating pollution prevention into its overall environmental program, including training its entire staff in P2 methods and benefits. IDEM's Office of Pollution Prevention and Technical Assistance (OPPTA) has trained over 324 IDEM employees to incorporate P2 in all agency-administered regulatory and enforcement programs. New employees receive P2 training before they receive training for their own jobs. The half-day training course includes a video presentation, problem solving, and discussion. OPPTA has developed an additional 14 technical seminars on industry-specific P2 methods.

OPPTA also has integrated P2 recognition and training into IDEM's enforcement program. The Department is considering using its inspectors to encourage P2 at individual sites. While conducting routine compliance inspections, inspectors may distribute on-the-spot awards for plants or companies which have voluntarily reduced pollution. Other companies will receive P2 training materials. IDEM recognizes that inspectors will require significant training in P2 methods for the facilities they visit, and must be provided with quantifiable P2 performance measures for determining progress.

OPPTA also integrates P2 into Indiana's environmental program through regulatory review. Over the past few years, staff have analyzed over 300 proposed rules and policies for opportunities to encourage P2. Through this analysis OPPTA attempts to work with rule writers from all IDEM programs to encourage P2. OPPTA is now beginning to review existing rules for P2 opportunities.

OPPTA has awarded eight P2 Challenge Grants totaling $196,790 to manufacturers, universities and consultants to encourage P2. For example, Altec Engineering received $25,000 to reduce styrene emissions at its fiberglass plant by 50 percent. Millennium Environmental received over $25,000 to teach P2 to municipal wastewater treatment operators. OPPTA views these grants as one of the most practical methods for encouraging P2 in the state.

Finally, Indiana is one of approximately 40 states that have entered into National Environmental Performance Partnerships with EPA. (See related article on page 3.) P2 is the first priority embodied in the Performance Partnership Agreement between IDEM and EPA Region 5. The P2 goals and specific objectives embodied in the Agreement, stated in measurable performance indicators, indicate where IDEM will be directing its P2 efforts. (See box below for a partial listing of P2 goals and objectives.)

For more information contact Rosemary Cantwell, Pollution Prevention Branch Chief, IDEM, at 317-238-6661, e-mail: rwc@opn.dem.state.in.us.

Sample of Goals & Objectives in Indiana's Performance Partnership Agreement

Goal A-1: Use pollution prevention to reduce toxic chemicals in environmental waste from manufacturers.

Objectives:

A.1.1: Ninety percent of companies required to meet maximum achievable control technology standards under the Clean Air Act will comply through P2.

A.1.2: Fifty percent of treatment works that have a potential or real impact on Publicly Owned Treatment Works (POTW's) will conduct P2 opportunity assessments for 25 percent of their significant industrial users before 1999.

A.1.3: Reduce the amount of hazardous waste shipped from operations other than environmental cleanup sites by 10 percent before 2000. (May be modified to include cleanup wastes.)

A.1.4: Use P2 to reduce the quantity of toxic chemicals in manufacturers' environmental waste by 20 percent before 2001.

A.1.5: Develop and implement a comprehensive quality assurance program for the annual reporting of toxic chemicals through the federal Toxic Release Inventory.

A.1.6: By 2000, 75 manufacturing facilities will implement P2 recommendations of the Clean Manufacturing Technology and Safe Materials Institute.

Environmental Accounting

Carrying the Environmental Accounting Torch in New Jersey

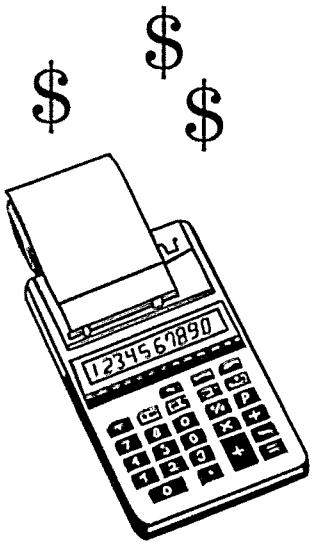
Melinda Dower, New Jersey Department of Environmental Protection

New Jersey's Pollution Prevention Act of 1991 mandated pollution prevention planning for the approximately 700 manufacturing firms in New Jersey required to perform Toxics Release Inventory (TRI) reporting. The Act requires firms to list facility and process-level materials, provide accounting data, and develop goals for reducing nonproduct output and chemical use. In addition, firms must examine a variety of environmental costs associated with their manufacturing processes.

> Planning appears to be successful in leading some facilities to identify new P2 opportunities and in continuing to provide an impetus to facilities already experienced in finding P2 opportunities.

The New Jersey Department of Environmental Protection views calculation of environmental costs as critical to the widespread adoption of P2 principles. Therefore, it has asked New Jersey manufacturers to estimate their costs in the following categories:

- Storage and handling, including safety and health compliance
- Monitoring, tracking and reporting
- Treatment
- Transportation and disposal
- Manifesting and labeling
- Permit fees
- Liability insurance, if applicable



Rather than prescribing a detailed reporting format, NJDEP tries to get production managers to think about how much time and money they spend on the above items. NJDEP also points out to firms how quantifying these costs can lead to better business decisions. Specifically, NJDEP describes how better cost data lead to better pricing decisions, raw material savings, decreased production times, and better product mix decisions.

Evaluation Conducted

NJDEP recently completed an in-depth evaluation of the P2 planning program. The evaluation covered 115 firms and included on-site plan reviews, a questionnaire on the firm's operations and motivations, an analysis of P2 goals and TRI data, and statistical analyses to determine which planning elements led to greater pollution reduction.

Overall, the study found that planning appears to be successful in leading some facilities to identify new P2 opportunities and in continuing to provide an impetus to facilities already experienced in finding P2 opportunities. However, not all aspects of planning were equally successful and not all facilities benefited equally. Significant findings of the evaluation include:

- Savings realized by facilities outweigh the costs of P2 planning. Depending on the figures used to calculate average savings and costs, the savings to cost ratios range from 3:1 to 8:1.
- Facilities conducting detailed P2 planning realized greater savings, and cost-effective P2 opportunities continue to be plentiful.
- Most of the 115 participating facilities did not complete the required cost accounting, leaving NJDEP unable to conclude that cost accounting prevented more pollution. Currently, many firms, particularly smaller ones, simply do not have the time or inclination to estimate environmental costs.

We conclude that we must continue developing educational materials, case studies, and outreach efforts to convince firms of the benefits of environmental accounting.

For further information or for a copy of the evaluation study, contact Melinda Dower at 609-292-1122 or via e-mail at mdower@DEP.STATE.NJ.US.

Commentary

Setting Out a Roadmap for Future P2 Efforts

Andrea Kreiner Farrell, Chair, National Pollution Prevention Roundtable

First formed in 1985, the National Pollution Prevention Roundtable is the largest membership organization in the United States dedicated solely to avoiding, eliminating and reducing pollution at the source.

Over the past decade, members of the National Pollution Prevention Roundtable have achieved substantial results in reducing pollution entering the nation's air, land and water resources. The Roundtable's core constituencies of state, local and tribal government officials, have long been the vanguard of innovative environmental protection efforts and at the forefront in developing comprehensive pollution prevention programs.

After years of "working in the trenches," public and private sector pollution prevention programs can now document dramatic reductions in waste and toxic substances as a result of their efforts. Quantitative evaluations across the country now attest to the effectiveness of promoting pollution prevention measures as the first line of attack in achieving superior environmental results. These striking results have been achieved by making efficient use of minimal resources.

Funding is a major problem.

While significant progress has been achieved, several issues impede the country's ability to truly achieve a prevention-based national environmental protection framework:

- Multi-media, prevention-based environmental protection approaches are not routinely considered and used by environmental media programs in federal, state or local government.
- The current federal environmental framework is not designed to adequately foster pollution prevention, provide flexibility for innovation within industry and within state and local governments. The current laws also do not send appropriate environmental cost signals to consumers and industry, resulting in an inefficient use of resources and pollution.
- Even with conventional and costly end-of-pipe control and treatment technologies, the nation's air, land and water resources are still being impacted—often by small difficult to manage pollution from dispersed and persistent sources.
- Funding is a major problem. Prevention-based programs are competing for resources with traditional well-funded end-of-pipe environmental programs.

Roadmap for the Future

National, state, and local environmental policies and programs must incorporate a prevention-first approach to environmental management and support innovation during regulatory and non-regulatory interactions with business, government and local communities. A strong network of state, local, NGO and other pollution prevention service providers must be expanded and strengthened to support national efforts to reduce pollution. In addition the price of goods and services must reflect true environmental costs.

Two key efforts on the part of Congress and the Administration would help define P2 as the cornerstone of our nation's environmental policy:

1. Assess and strengthen the Pollution Prevention Act (PPA) of 1990. PPA needs to be amended to reflect the dramatic changes that have occurred in the field of pollution prevention since 1990. It is no surprise the PPA has been considered to be fairly ineffective. The Act has a limited mandate and competes with much better funded, end-of-pipe environmental statutes such as the Clean Air Act, the Clean Water Act, and RCRA. This year a mere $5 million is being made available

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Associations

State Officials' Associations Keep P2 Fires Burning

Despite good intentions and general acceptance of the benefits of pollution prevention, the major associations representing state air and waste officials are finding that getting their members' attention for pollution prevention is an uphill battle. EPA's Media Association Pollution Prevention Forum brings together state environmental officials from air, water, and solid waste programs, and has been a major driver in helping state associations integrate pollution prevention into their mandates. Two associations' efforts follow.

For more information contact: Marsha Wilhite, STAPPA, at 402-441-8188, and John Ianoffi at ASTSWMO, 202-624-5828.

STAPPA/ALAPCO

The Pollution Prevention/Sustainability Committee of the State and Territorial Air Pollution Program Administrators and the Association of Local Air Pollution Control Officials (STAPPA/ALAPCO) estimates that approximately one-third of state and local air programs nationwide are actively involved in P2 activities. For the past several years, however, state and local air program staff time and effort have largely been consumed by implementation of the 1990 Amendments to the Clean Air Act. Still, members of the P2/Sustainability Committee are determined to keep pollution prevention issues on the radar screens of their peers through regular monthly conference calls, panels at the semi-annual membership meetings and the compilation of regulatory integration success stories. The Committee believes that if air program staff can access P2 information at the locations they usually consult for permitting and enforcement activities, they will be more likely to recommend P2 options to the sources they work with.

ASTSWMO

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) also recognizes the need to promote P2, and facilitates information sharing through its Waste Programs Pollution Prevention Subcommittee. The Subcommittee's three task forces concentrate on P2 implementation, technology transfer and training, and resources.

The Subcommittee's mission is to integrate P2 into all waste management programs. Like STAPPA/ALAPCO, ASTSWMO's Subcommittee is compiling a summary of P2 success stories. In addition, the Subcommittee is establishing a network of state waste program P2 contacts, providing P2 information at annual meetings, and preparing a concept paper on whole facility management.

Future P2

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under Pollution Prevention Incentives for States (PPIS), the only dedicated federal funding set aside for state prevention activities. This amounts to less than one percent of federal grant funds to states for environmental programs. P2 deserves a larger percentage of funding.

2. Incorporate a prevention-first approach in EPA's ambitious National Environmental Performance Partnership System (NEPPS), EPA's innovative version of block grants to the states. The NEPPS program has tremendous potential to leverage more resources and commitment to P2 nationwide. It is important for EPA to include strong prevention activities and incentives into the agreements signed by the state environmental agencies. While we work on cross cutting strategies, such as amending the PPA of 1990, we must help make P2 a key component of the existing system.

The Roundtable will continue to be an aggressive advocate for pollution prevention and its practitioners and will continue to raise the profile of prevention in the national discussion of environmental management.

P2 Permitting

P4 Pilot Project Injects Pollution Prevention into Air Permits

Dave Dellarco, EPA Region 10

EPA developed the Pollution Prevention in Permitting Pilot (P4) Project in an effort to find an effective way to promote pollution prevention within the Clean Air Act. Another goal of the project is to advance the Clinton Administration's "reinvention" initiative for flexible, facility-wide air permits.

The P4 permits developed to date have pioneered the introduction of pollution prevention as an important tool in preparing flexible, streamlined, and environmentally beneficial air permits. These permits enhance operational flexibility through tools such as advanced minor New Source Review (NSR) and streamlined compliance demonstration. They also show that measurable pollution prevention progress can generate unique opportunities for providing sources with operational flexibility. For example, several P4 permits include a mechanism for offsetting emissions increases with emissions reductions through P2.

Because changes in existing control technology can trigger minor NSR and Title V permit modifications, it can be less costly for a source, and less burdensome for a source and permitting authority, to use P2 offsets rather than control technology offsets. For example, EPA estimates that Searle Pharmaceutical can earn up to $1 million for every day that it does not need to wait for a permit to produce a new drug.

In addition to creating greater flexibility, P4 permits also realize pollution prevention gains through the use of emissions caps. Annual facility-wide caps, plant-wide applicability limits, and daily stationary source caps all serve as incentives for sources to engage in pollution prevention. At a minimum, these caps ensure environmental "neutrality" over the course of the permit term. However, if these caps remain fixed over time, the permits will actually reduce pollution if the source experiences economic growth.

States Reap Multiple Benefits

State permitting authorities that have participated in P4 projects have already realized numerous benefits. First, providing greater regulatory flexibility for a source often results in less time and paperwork for the permitting authorities. Further, sources can become more satisfied with the permitting process and more willing to comply with permit terms.

Some state permitting authorities credit P4 with an enhanced working relationship with air pollution sources. For example, Ray Bishop of the Oklahoma Department of Environmental Quality believes that his agency's reputation among the regulated community has improved substantially. Mr. Bishop and other "P4 alumni" are looking forward to applying lessons learned from their pilot projects to additional sources in the future.

Communicating such "lessons learned" to all levels of government and making pollution prevention a routine component of Clean Air Act permitting are important future goals of the P4 Project. To help ensure a broad distribution of P4 experience and benefits, new P4 projects are being developed in different EPA regions across the country. In addition, several sources which have already participated in a P4 project have expressed interest in transferring their knowledge to facilities under different permitting authorities. Educational materials and P4 training workshops are being developed for both permit writers and state and local air program managers. These workshops, in combination with continued pilot projects, will help guarantee that an increasing number of state and local permitting authorities will experience the many benefits of P4.

For more information contact: Dave Dellarco, P4 Program Director, EPA Region 10, 206-553-4978, e-mail: Dellarco.Dave@epamail.epa.gov

Counties

U.S. Counties Make Pollution Prevention Work

The National Association of Counties (NACo), which represents the country's 3,000 county governments, is playing a role in advancing local P2 efforts. As a national organization, NACo provides a link across counties and between counties and national P2 organizations.

Thurston County, WA staff helps a local print shop outline pollution prevention opportunities.

Counties are well positioned to lead P2 efforts. In providing such services as garbage collection and disposal, drinking water purification, and sewage treatment, they are often the first point of contact between citizens and public health and environmental officials. This same proximity to residents and businesses means that counties are well positioned to distribute P2 information and assistance. County workers such as fire inspectors, permitting and licensing officers, health officials, and zoning and planning board members have numerous opportunities to promote P2. Moreover, in their capacity as building owners and managers, fleet operators, and procurement agents, county governments can incorporate P2 into internal operations and provide the benefit of their experience to the community.

With increased devolution of responsibility from the federal to the state and local levels and greater regulatory flexibility, counties have more opportunities to serve as leaders in the pollution prevention field. However, county officials need information and assistance — on how to staff and finance programs, and how to set priorities and measure progress.

Closing the Info Gap

NACo wants to help close this information gap. One of the best sources of information for counties is other counties. County officials benefit greatly from learning how their peers have resolved similar problems. NACo has a variety of mechanisms for helping counties link with each other. These include two major and two minor conferences per year, regional seminars and trainings, vidoeconferences, state-level meetings, a bi-weekly newspaper with a circulation of 35,000, a quarterly environmental newsletter, a host of publications, and telephone referrals.

To provide counties concrete examples of how pollution prevention can be put into practice, NACo published ***Preventing Pollution in our Cities and Counties: A Compendium of Case Studies***, that has been disseminated to over 5,000 local governments and individuals. In conjunction with the National Recycling Coalition, NACo co-wrote ***Making Source Reduction and Reuse Work in Your Community: A Manual for Local Governments.*** We will soon be publishing ***County Case Studies: Flushing our Problems with Septic Tanks***.

NACo also has numerous forums for county leaders to meet with each other in small groups. For example, for our new Environmentally Preferable Purchasing Project, we have formed an advisory committee of local elected officials, environmental staff, and procurement officials, and established a series of county-based pilot projects. Through these pilots, participating counties can connect with other counties researching and testing environmentally preferred purchasing in eight areas: automobile and heavy equipment; cleaners; pesticides and lawn chemicals; office supplies; paints; construction and demolition; buildings design and energy efficiency, and printing. By "buddying" pilot communities with other local governments, pioneers are given the support and information they frequently lack when beginning a new program. NACo is developing a "starter kit" to help counties nationwide embark on similar efforts.

For further information contact: NACo, (202) 942-4262, or E-mail nfriedma@naco.org or thayes@naco.org

States

Requiem for a State TAP

The decade-old ConnTAP — Connecticut Technical Assistance Program — closed its doors on July 1, 1997, a victim of legislative budget cuts. Over the years, ConnTAP answered thousands of telephone hotline requests, issued matching grants and loans, and published reports, case studies, and fact sheets. Perhaps its most visible effort was a Site Visit Program that helped 150 Connecticut companies identify ways of operating more efficiently while reducing the amount of hazardous emissions they generate.

Operating with only five retired engineers, the free Site Visit Program targeted small and medium-sized businesses. ConnTAP estimated that its recommendations to businesses with which it worked would result, if fully implemented, in annual reductions of 115 million gallons of wastewater, 3 million pounds of air emissions (volatile organic compounds), and 11 million pounds of hazardous waste. In follow-up surveys, ConnTAP's clients have indicated that they have implemented about half of ConnTAP's recommendations.

Among ConnTAP's other efforts was a Materials Exchange to provide businesses with an alternative to the disposal of unwanted materials. The exchange focused on materials that would otherwise require disposal as hazardous waste. Listings of materials offered and materials needed were published in ConnTAP's quarterly newsletter.

According to Rita Lomasney, Hazardous Waste Program Director, when ConnTAP started out in 1987, "not many people were convinced that pollution prevention could deliver on its promise to simultaneously reduce waste generation and costs." Thousands of cases later, Lomasney believes that "pollution prevention *has* delivered on its promises, despite the fact that it is has gotten harder, not easier, to find ways to reduce waste. Early on, better housekeeping and simple operating modifications yielded remarkable results. Now, however, companies are finding that capital and technology are needed to produce additional waste reductions."

Lomasney noted that Connecticut's manufacturing sector has been in decline and that small and medium-sized companies are doubly burdened by limited resources that make it difficult to comply with regulations and stay current with regulatory and technology changes. "What's sad is that Connecticut's manufacturing companies need more, not less, assistance. The fact that ConnTAP was a nonregulatory program enabled us to gain the trust of the businesses we served and increased our effectiveness. As of July 1, 1997, there is no nonregulatory state agency able to provide Connecticut companies with environmental assistance."

"What's sad is that Connecticut's manufacturing companies need more, not less, assistance."

Dozens of Connecticut companies rose to the defense of ConnTAP in the recent legislative session, although to no avail. Carol Violette of the Delta Rubber Company in Danielson, CT wrote, "Because of ConnTAP's assistance, our company was able to identify a number of practical and economical ways of reducing and, in some cases eliminating, waste generation at the plant." Lomasney laments the fact that funding was cut off despite ConnTAP's record of achievements, and advises other TAPs to investigate fee for service possibilities to avoid a similar fate.

ConnTAP's demise has elicited both surprise and regret from counterparts in state and federal programs. Lena Ferris, who manages state pollution prevention grants for EPA's Pollution Prevention Division, commented, "We and the people of Connecticut will certainly miss ConnTAP's hard work and commitment to pollution prevention in the coming years. The unexpected precariousness of the program's financing brings home to all of us how important it is for technical pollution prevention assistance programs to be part of the mission of state environmental agencies in order to ensure the sustainability of these programs."

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Calendar

DATE/SITE	EVENT	SPONSOR	CONTACT	E-MAIL/WWW
November 12-14 CA	NPPR Fall Workgroup Conference	National Pollution Prevention Roundtable	Tel: 202-466-3908	es.inel.gov/nppr Northern
November 17-19 Atlanta, GA	GA Pollution Prevention/ Green Manufacturing Conference for Industry and Business	EPA Region 4	EPA Region 4 404-562-8649	
December 8-10 Providence, RI	NEPPS Performance Partnership Workshop	EPA Region 1, ECOS	Katrina Kipp 617-565-3520	kipp.katrina@epamail.epa.gov
December 8-12 Williamsburg, VA	The Environment 2000 Institute: Proactive Environmental Strategies for Forward-Thinking Organizations	Government Institutes	Jesus Ferro Tel: 301-921-2345 Fax: 301-921-0373	giinfo@govinst.com www.govinst.com

NATIONAL P2 NETWORK MOVING FORWARD

EPA's Office of Pollution Prevention and Toxics has awarded over $1 million in grants to maintain four existing regional pollution prevention information centers and create five new centers. These regional centers will be coordinated as part of a national Pollution Prevention Information Network. The network will improve the quality, standardization, and accessibility of pollution prevention information, while avoiding duplication of effort.

The regional centers will supply and update information for training and operation manuals, case studies, and technical aids. Users are expected to include states, as well as businesses and other interested parties. Each regional center will establish an advisory committee of state representatives to ensure the relevance and accuracy of the information it provides. For further information, contact Beth Anderson, EPA, at tel: 202-260-2602; fax: 202-260-0178, or e-mail: Anderson.Beth@epamail.epa.gov.

P2 Information Center Web Sites

Waste Reduction Resource Center (EPA Regions 3&4) www.owr.ehnr.state.nc.us/wrrc1.htm

Great Lakes Regional Pollution Prevention Center (EPA Region 5) www.inhs.uiuc.edu/hwric/ hmlhome.html

University of Texas at El Paso (EPA Region 6) www.utep.edu/im3/p2/

Pacific Northwest Pollution Prevention Resource Center (EPA Region 10) pprc.pnl.gov/pprc/

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