



Pollution Prevention News

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Your comments and
letters are welcome!

Please write:

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Editor's Corner

Summertime hasn't managed to slow things down in the pollution prevention world, as conferences, workshops, and program activity proceed full tilt through July and August! Here in Washington the pace quickens still further as of July 10th when proposals for EPA's 2% pollution prevention pool begin the review process. We fully expect that the proposals will represent a variety of new and creative initiatives in pollution prevention. Look for a detailed report on the awards in the September issue of *Pollution Prevention News*.

With all the discussion of pollution prevention, it is sometimes difficult to get a handle on what the term encompasses. As is clear from the article below on EPA's Pollution Prevention Policy Statement, there is room for debate on how pollution prevention should be defined, particularly with respect to the issue of recycling, and there are good points to be made on all sides of the issue.

We don't expect the definition of pollution prevention to be resolved once and for all overnight. Indeed, we believe our thinking on pollution prevention activities will evolve over time. Which is why, in the course of this evolution, we will all need to keep our eyes on the larger picture. The type of progress we are seeking requires a fundamental shift in attitudes and activities on the part of government, industry, and consumers. Switching over an entire society to a pollution prevention approach is an enormous undertaking. As we go forward, let's try to keep the focus on the common goals we share and not on the issues that divide us.

Once again, let me extend a personal invitation to organizations involved in pollution prevention to let the rest of us know about your activities, plans, and accomplishments. Send us a note at Pollution Prevention News, U.S. EPA, 401 M Street SW (PM-219), Washington, D.C. 20460.

EPA's Pollution Prevention Policy

EPA has received some 60 comments from companies, environmental groups, industry associations, states, local governments, federal agencies, and individuals on the Agency's Pollution Prevention Policy Statement, published on January 26th in the *Federal Register*. Many of the commenters commended EPA for moving forward in developing national policy in this area and encouraged the Agency to emphasize a cross-media perspective on pollution prevention and to expand prevention efforts to other federal agencies.

EPA's policy statement specifically requested comments on whether and to what extent recycling should be part of a pollution prevention strategy. In EPA's policy statement, first preference is accorded to source reduction (including

on-site, closed-loop recycling) in order to reduce risks to public health, safety, and the environment. The use of environmentally sound recycling (including out-of-loop recycling) is considered the next best approach in EPA's hierarchy for achieving environmental protection goals.

Comments on the recycling issue ranged across the board, from opposing the inclusion of any out-of-loop recycling in a prevention policy to insisting that recycling be accorded equal preference with source reduction. Arguing in favor of recycling's inclusion were most industry groups as well as the Departments of Energy and Interior. Some of the commenters noted that small facilities may be unable to support on-site recycling facilities, and that other companies may be

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Reports from EPA Offices

TRI Waste Min Data

by David Sarokin
Office of Toxic Substances

Analysis of data collected for the Toxic Release Inventory (TRI) sheds some light on waste reduction practices. Despite problems of incorrect responses and low participation, waste minimization information is available for 2,090 facilities (11 percent of the total reporting) for at least one chemical.

Just counting the number of forms submitted, firms in California and New Jersey reported waste minimization most frequently, with the chemical industry and fabricated metals manufacturers submitting more forms than any other industry. Trichloroethane and toluene were the two chemicals most often reported as having been reduced. Recycling (on or off-site) was the waste reduction method of choice for two-thirds of the reports.

Self-initiated review was the reason cited for the largest number of waste minimization activities, followed by reduced treatment/disposal costs. Recycling and improved "housekeeping", according to the data, were also popular, but had little impact on reduced volume of waste. Regulations reportedly had the smallest impact on decisions to practice waste reduction.

Of the 2,090 facilities that submitted information on waste minimization, 802 facilities completed forms for both 1986 and 1987. For these companies, waste was reduced by 52.4 million pounds between 1986 and 1987, a 43% reduction. The bulk of these reductions were achieved in facilities located in Michigan and Texas; some large volume reductions were reported for the chemicals sodium sulfate and sodium hydroxide.

An interesting correlation appeared in the relationship between production and waste minimization for this group of facilities. Companies that more than doubled their level of production reported the greatest overall reductions in waste, while those companies that halved production were not able, as a group, to halve their waste generation. As a second year of TRI data becomes available, the general data on releases and transfers of waste, as well as the answers to explicit waste minimization questions will provide additional information on pollution prevention practices and their impacts.

For more information, contact David Sarokin at (202) 382-3715.

Gulf of Mexico Program

With a coastline of over 1,600 miles, half the nation's wetlands, and 40% of the commercial fish yield, the Gulf of Mexico is one of the most remarkable marine resources of this country. The year-old Gulf of Mexico Program (GMPO), based at the John C. Stennis Space Center in Mississippi and supervised by EPA's Regions 4 and 6, is intended to keep the Gulf's resources thriving for generations to come.

GMPO was created as a comprehensive integrated response to environmental problems in the Gulf that cross state, federal, and international lines. Supporting GMPO's staff are three committees made up of officials from 12 federal agencies, the 5 Gulf states (AL, FL, LA, MS, TX), the research community, and citizen representatives. The intent is to provide an appropriately broad institutional structure that will foster Gulf-wide coordination and communication.

Threats to the Gulf of Mexico come from a variety of sources, including both industrial and agricultural pollution and growing population demands for housing, urban development, and recreational access. Dredge and fill operations for canal construction, sea level rise, diversion of freshwater inflows, increased salinity, and losses of wetlands, seagrass beds, and other important habitats, have combined to threaten the health and ecological integrity of the Gulf.

Among the projects being planned by GMPO are baseline inventories of some of the Gulf's resources; identification of areas and species that require special protective measures; determination of pollutant loadings from river inputs to the Gulf and remedies to prevent further pollution and/or clean up con-

taminated sediments in certain areas.

Work is now beginning on a computerized catalogue of databases relevant to the Gulf—for example, databases with information on Gulf resources, monitoring data, salinity profiles, etc. Anyone knowing of relevant databases is requested to contact GMPO. Accompanying the catalogue will be a listing of scientists and current research projects related to the Gulf. The catalogues are expected to be available and on-line in mid-1990.

For further information, contact William R. Whitson, (601) 688-3726.

PPO: State Applications Deadline Extended

EPA is extending the August 15th deadline for submitting applications for the Pollution Prevention Incentives for States program until September 30, 1989. EPA believes that the extension will give potential applicants more time to coordinate within their states and regions and to develop comprehensive multimedia applications. To date, the Pollution Prevention Office has received well over 100 letters of intent to apply for grants and cooperative agreements.

Among the activities eligible for funding are direct technical assistance in source reduction and recycling, institutionalizing multimedia pollution prevention as an environmental management priority, education and outreach, and identifying barriers and incentives to pollution prevention. EPA plans to distribute \$3.2 million in FY 1989 funds as well as any additional FY 1989 grant funds appropriated by Congress. This is expected to be the only round of awards in FY 1990. For further information, contact Jackie Krieger or Brian Symmes at (202) 245-4167.



Wetlands and industry on the Gulf coast.

People and Places in the News: L.A. Awards of Excellence

On May 1, Los Angeles Mayor Tom Bradley presented the first ever Mayor's Award of Excellence for Outstanding Achievement in Pollution Prevention to Major Paint Company of Torrance, California for "significant reduction of solid and hazardous wastes, air emissions and wastewater discharges." The award was one of four presented at the third Los Angeles Hazardous Waste Seminar to honor industries and businesses in the City of Los Angeles that have exhibited outstanding commitment to protecting the environment through innovative hazardous waste management practices.

Major Paint Company reduced its annual generation of hazardous waste from 1,000 tons to zero through source reduction and recycling methods. Major achieved a 50% reduction in disposal of dirty cleaning solution by using a longer-lived substitute solution; reduced wastewater volume by 25% by switching to a high pressure spray system to wash stationary tanks; and saved 10% of wastewater by dedicating paint tanks to a single color, so as to avoid cleaning tanks completely between batches.

Awards of Excellence for Significant

Achievement in Pollution Prevention went to three other companies. Litton Guidance and Control Systems, an R&D firm, increased its waste recycling efforts from 59% in 1986 to 85% in 1988.

A second award went to Valley Plating Works, Inc., for reducing its volume of waste through the innovative use of a modified cement mixer to dry out hazardous sludge at low temperatures, saving \$6,000 per month in disposal costs and \$4,000 a year in heating costs. The third company honored was Younger Optics, for the design and installation of a plating system which eliminates the need to replace plating solution or to dispose of filters.

In a telegram to Deborah Hanlon, head of the Los Angeles Hazardous and Toxic Materials (HTM) Project which sponsored the event, EPA Administrator William K. Reilly praised the awards and their recipients as "further proof that pollution prevention isn't just a concept people are talking about but an effort people are doing something about."

The Los Angeles HTM Project was established by the City of Los Angeles in



Kim Hubert and Robert Abrams of Major Paint Co. receiving award from Mayor Tom Bradley.

July 1989 to ensure that the City conforms to and promotes the national hazardous waste minimization policy. The Project provides nonregulatory technical assistance to city departments and city businesses that use hazardous materials and generate hazardous waste. Activities to date have included inspections of city-owned properties, training of over 300 city employees, three Hazardous Waste Management and Minimization Seminars for industry, and establishment of an information clearinghouse. The Project will be undertaking a study of metal waste reduction, to include on-site waste minimization assessments at 10 local plating shops. For further information, contact Deborah Hanlon, (213) 237-1209.

Comments (cont'd) from page 1

dissuaded from pursuing closed-loop systems because of the need for Part B RCRA permits. Commenters from the mining and petroleum industries stated that extraction and re-refining do not lend themselves as well as other industrial processes to source reduction and recycling. Moreover, recycling in these industries reduces the need for new supplies of nonrenewable resources. In some cases where no substitute materials are technologically or economically feasible, recycling is the preferred choice.

Arguing against the inclusion of recycling in national prevention policy were a number of environmental groups who pointed out that out-of-loop recycling occur after wastes have been generated and should thus be considered as a waste management option. The groups questioned whether such recycling can be pursued in an environmentally sound manner; for example, off-site recycling involves transporting wastes to a recycling facility which increases the risk of transportation accidents. Moreover, as of 1986, ten per-

cent of Superfund sites were former recycling facilities. One commenter noted that including off-site recycling in the definition of pollution prevention "gives industry the signal that it is justifiable to avoid... production changes that reduce, avoid, or eliminate the generation of hazardous waste and environmental pollutants."

Somewhere in the middle on this issue were various commenters who agreed that recycling should receive secondary focus, but is nevertheless important, given that it will take a long time to shift existing manufacturing and processing practices to the point where true prevention takes hold. Also, recycling provides a greater role for individual citizen involvement. One environmental group favored the inclusion of recycling in a pollution prevention program, as long as the burning of waste materials for their energy content was excluded from the definition of recycling. This group noted that recycling has positive "multiplier effects" on all upstream industrial operations. It reduces the need for facilities to purchase virgin material, reducing the amount of raw materials needed to make

the virgin material, etc.

Several commenters suggested that EPA clarify the term "source reduction" and distinguish between the concepts of "source reduction" and "use reduction." Use reduction aims at decreasing the amount of hazardous substances used by industry and our society. Input substitution, product reformulation, and redesign of certain processes and products would constitute use reduction. By contrast, the goal of source reduction is to increase the efficiency with which materials are used, through process modification, improved housekeeping, and closed-loop recycling.

Other areas touched on by numerous respondents included the need for wider public and international involvement, the importance of technical and financial assistance to the states, the need for a national data base on pollution prevention, and the issue of regulation versus voluntary action. After a careful review of all comments received, EPA will prepare a formal summary of the comments and finalize the policy statement. The public docket of comments is available for viewing at the RCRA Docket, 401 M Street SW, Washington, D.C. 20460.

Upcoming Events in August and September

<u>Title</u>	<u>Sponsor</u>	<u>Date/Location</u>	<u>Contact</u>
Minimization Audit Training Workshop (Chemicals, Electronics, Metal Finishing)	U.S. EPA	August 2-3, 1989 Newark, NJ	Don Duvall (513) 252-1222
Waste Minimization Workshop	Alabama Dept. of Environ. Management, others	August 8-9, 1989 Birmingham, AL	Debi Carroll (205) 942-7900
Waste Minimization in the Tri-State Area (for Ohio, Kentucky, Indiana generators)	EPA, Ohio Tech Transfer Org., Kentucky Partners, Indiana Dept. of Env. Management	August 17, 1989 Cincinnati, OH	Jan Zieleniewski (513) 782-4796
Prevention, Management, and Compliance for Hazardous Wastes	American Institute of Chemical Engineers (AIChE) (Short course)	August 23-24, 1989 Philadelphia, PA	Registrar (212) 705-7526
Haztech International '89 Conferences & Exhibitions	Haztech International	Sept. 12-14 Cincinnati, OH Sept. 27-29 San Francisco	Ursula Barril (800) 468-7644
Metal Waste Management Alternative Symposia	EPA, California Dept. of Health Services	Sept. 12-13 Pasadena, CA Sept. 18-19 San Jose, CA	Deborah Hanlon (818) 449-2171
Recycling/Composting Solid Waste and Sludge	Biocycle, Maine Dept. of Env. Protection, others	September 13-15, 1989 Portland, ME	Celeste Madtes (215) 967-4135
North American Waste Exchange Conference	Renew (Texas Water Commission)	September 17-20, 1989 San Antonio, TX	Sheri Estes (512) 463-7754

Correction:

The correct number for the RCRA/Superfund toll-free hotline is 1-800-424-9346.
In Washington, DC, the hotline can be reached at (202) 382-3000.

United States Environmental
Protection Agency
Washington, DC 20460

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