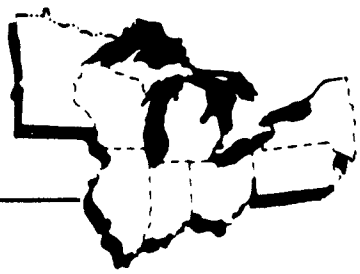
United States
Environmental Protection
Agency

Great Lakes National
Program Office

230 South Dearborn Street
Chicago, Illinois 60604



EPA

Environmental FACT SHEET

905N00001

HIGHLIGHTS

U.S. ENVIRONMENTAL PROTECTION AGENCY

GREAT LAKES POLLUTION PREVENTION ACTION PLAN

THE OBJECTIVE

EPA believes the time has come:

- for a highly-focused and action-oriented approach to seeking the goal established under the Great Lakes Water Quality Agreement of virtually eliminating persistent toxic substances in the Great Lakes; and
- to promote Basinwide pollution prevention efforts as the preferred way of achieving that goal.

THE GAME PLAN

EPA's Pollution Prevention Strategy includes the following principles:

- selecting specific pollutants, sources, and geographic Areas of Concern as the focus of their efforts, such as in Northwest Indiana and the Niagara River;
- setting benchmarks to measure progress toward the goal of virtual elimination;
- focusing institutions and programs throughout the Great Lakes Basin on this effort through the Great Lakes Pollution Prevention Challenge;
- integrating pollution prevention into existing environmental efforts, including permitting, regulatory development, and enforcement; and
- ensuring the involvement of all concerned parties in the public and private sectors through Lakewide Management Plan and Remedial Action Plan processes, the International Pollution Prevention Symposium, and other efforts.

THE GREAT LAKES POLLUTION PREVENTION CHALLENGE

The Governors of the Great Lakes States, in cooperation with EPA, will:

- challenge all sectors of society in the Great Lakes Basin including industry, agriculture, academia, communities, public interest groups and consumers to create and carry out innovative projects to reduce or eliminate releases of pollutants into the Great Lakes ecosystem;

- examine any technical and/or regulatory roadblocks to meeting the Challenge; and

- recognize those who excel in meeting the Challenge.

This Basinwide effort will provide the framework for the following four major initiatives that will be launched under this Action Plan. These initiatives were chosen because, taken together, they address the broad spectrum of pollution prevention opportunities available in the Basin.

AUTO INDUSTRY INITIATIVE

First, in a public/private initiative, EPA and the States will work in conjunction with Chrysler, Ford and General Motors to promote voluntary pollution prevention of persistent toxic substances that adversely affect the Great Lakes.

- These automobile companies will participate with EPA and the States in a basin-wide effort to determine which persistent toxic substances are of greatest concern to the Great Lakes ecosystem. Once priorities have been established, these companies will evaluate which materials are in use in their manufacturing.

- These automobile companies will document their past efforts to reduce the use and generation of these toxic substances; establish priorities for additional in-house pollution prevention efforts; and work with their suppliers to promote pollution prevention.

- Further, these companies will participate in technology transfer forums to share non-proprietary information on pollution prevention techniques and success stories, and participate in similar forums to share information about their efforts to establish pollution prevention as a way of doing business.

- In addition, these automobile companies commit to continue exploring new ways of reducing waste streams.

LAKE SUPERIOR INITIATIVE

As the second major initiative, EPA, in partnership with Minnesota, Wisconsin, and Michigan, will work cooperatively on pollution prevention efforts on Lake Superior. Lake Superior has not experienced the intensive development, urbanization and pollution that characterize of the lower Lakes. It has remained relatively pristine. Although it is the largest of the Great Lakes, Lake Superior is also the most vulnerable to pollution from toxic substances, since toxic substances tend to remain longer in Lake Superior. Once degradation does occur, it takes a longer time for Lake Superior to recover.

Public interest groups support the International Joint Commission's call for strong measures designed to protect the Lake. EPA and the Lake Superior States are committed to:

- Reducing the quantity of persistent toxic substances entering the Lake by building upon and accelerating existing environmental protection programs such as the Remedial Action Plans around Lake Superior.

- Preserving the high quality waters of the Lake by developing and reaching agreement on common procedures to stop degradation.

- Developing an inventory of Lake Superior's problems and reaching a consensus on "critical" pollutants.

- Establishing an improved international air toxic monitoring network in the Lake Superior Basin and conducting modeling to identify the major local and distant sources of pollution.

- Reviewing and strengthening existing environmental criteria for water and air programs and their implementation to ensure that they are adequate to protect the Lake.

- Supporting Minnesota's and Wisconsin's work with the St. Louis River Remedial Action Plan citizen committees and the private sector in developing an overall pollution prevention approach to eliminate or reduce major sources of discharge to the western end of Lake Superior.

- Supporting Minnesota's Lake Superior Project which will consist of an overall inspection/compliance initiative with an emphasis on pollution prevention. This project is geographically focused within the Lake Superior basin and includes the Western Lake Superior Sanitary District, home to most of the major industries in Minnesota's portion of the Lake Superior basin.

URBAN NON-POINT POLLUTION

As the third major initiative, EPA and New York will launch pilot programs in pollution prevention for urban non-point sources. In order to focus on the prevention of urban non-point source discharges in the small quantity generator and household hazardous waste areas, EPA will support New York's efforts to conduct three pollution prevention projects. Specifically:

- New York will conduct an intensive consumer education campaign on household hazardous waste use, disposal and reduction in conjunction with county and municipal governments (Monroe County/Rochester, Erie County/Buffalo, Niagara County/Niagara Falls and Jefferson County/Watertown).

- In addition, fact sheets will be developed to inform the public of the potential dangers of lawn chemicals and to assist them in making responsible lawn maintenance choices.

- New York will also work with smaller towns in these counties to help identify sources of non-point pollution. New York will develop guidance documents to help local officials discern the origin of non-point source discharges as well as to outline potential local courses of action which may be implemented in order to ensure the reduction of such discharges.

INTERNATIONAL SYMPOSIUM ON POLLUTION PREVENTION

EPA will co-sponsor with Canada an International Pollution Prevention Symposium to take stock of current pollution prevention efforts and chart future activities. This Symposium will be held in conjunction with a meeting of the International Joint Commission meeting in Fall 1991 in Traverse City, Michigan.

CONCLUSION

These are some, but by no means all, of EPA's and the State's efforts to prevent pollution and to protect the Great Lakes ecosystem. The efforts are envisioned as ways to enhance and buttress the aggressive regulatory and enforcement programs already in place. For instance, to fulfill their requirements under the Great Lakes Water Quality Agreement, EPA and the States are actively working to:

- Establish consistent water quality standards for the Great Lakes. It is anticipated

that pollution prevention technologies will help dischargers meet these new standards.

- Develop and carry out Remedial Action Plans for each of the 43 Areas of Concern identified by the International Joint Commission. EPA and the States will work diligently to ensure that cleaned up areas remain clean.

- Identify the critical pollutants that threaten each Lake and thus the ecosystem as a whole. This knowledge will enable Federal and State agencies to make informed decisions on the best ways to prevent critical pollutants from entering the Lakes in the first place.

The U.S. Great Lakes Pollution Prevention Action Plan is an important step in breaking the cycle of contamination and cleanup in the Great Lakes. Through EPA/State leadership and partnership, and by example, pollution prevention can become a way of life for all those who live and work in the Basin.

U.S. ENVIRONMENTAL PROTECTION AGENCY

GREAT LAKES POLLUTION PREVENTION ACTION PLAN

April 12, 1991

The United States is committed to ensuring a healthy Great Lakes ecosystem in which threatened species, such as the bald eagle, can successfully reproduce, and fish and wildlife are safe for consumption in unrestricted amounts. In order to achieve these environmental objectives, the levels of toxic substances found in the Lakes must be reduced significantly.

The United States Environmental Protection Agency (EPA) and the Great Lakes States will implement an ambitious effort to reduce the levels of toxic substances found in the Great Lakes Basin by promoting pollution prevention activities to significantly reduce or eliminate the use and/or release of toxic substances at the source, with a special focus on reducing or eliminating persistent bioaccumulative toxic substances. Pollution prevention activities will complement current Great Lakes efforts to reduce toxics, such as placing stringent permit limits on generators of toxics and remediating contaminated sediments.

In 1987, as part of the Great Lakes Water Quality Agreement, the United States and Canada committed to strengthening efforts to achieve the goal of virtually eliminating the release of persistent toxic substances into the Great Lakes Basin environment. This Pollution Prevention Action Plan for the Great Lakes marks a concerted effort to turn this goal into a reality.

Further, with the adoption of the national EPA Pollution Prevention Strategy and passage by Congress of the Pollution Prevention Act of 1990, EPA is firmly committed to promoting pollution prevention in every aspect of the Agency's operations. The Pollution Prevention Act of 1990 declares as national policy that pollution prevention is the preferred approach to environmental protection: reducing or eliminating pollution through, for instance, changes in production processes and/or by reducing reliance on environmentally harmful materials. When preventing pollution is not feasible, recycling in an environmentally safe manner is the next preferred option, followed by treatment.

Disposal or other release into the environment should be the management option of last resort, and should only be done in an environmentally protective manner.

EPA places a high priority on incorporating this hierarchy of options into all Agency activities and on encouraging all sectors of society - including government, industry, agriculture, transportation, educational institutions and individual consumers - to incorporate pollution prevention into their environmental decision-making as well. Industry, in particular, is increasingly aware that reevaluating products and processes for environmental reasons can lead to improvements that pay off competitively in lower costs and higher quality. A commitment to pollution prevention is a commitment to innovation - and innovation is the key to a competitive U.S. economy.

This Action Plan for the Great Lakes highlights how EPA will incorporate, in partnership with the States, pollution prevention into overall efforts to reduce the use and release of toxic substances in the Great Lakes Basin. These activities are designed to complement efforts already underway at the State and Federal levels. The Great Lakes States have laid much of the groundwork for promoting pollution prevention by pursuing a wide range of innovative programs. These include technical assistance efforts, demonstration projects, research programs, recognition of success through awards, education efforts, training initiatives, and facility planning requirements. Some States are also currently exploring ideas such as multi-media permitting, incorporating pollution prevention efforts into enforcement activities, linking permit fees to toxic generation rates, and addressing barriers to pollution prevention found in regulations. EPA will continue to coordinate closely with the States, provide funding for State pollution prevention activities, and target efforts under this Action Plan to complement and enhance State initiatives throughout the Great Lakes Basin.

This Action Plan has two distinct components. First it includes new initiatives designed to promote innovative pollution prevention practices throughout the Basin. Second, it involves reorienting and refocusing existing activities, such as enforcement actions, to ensure that pollution prevention is an integral part of government's environmental protection efforts. This Action Plan also builds upon the national EPA Pollution Prevention Strategy. The focus of the national strategy is reducing on-going generation of toxic pollution in any form (air emissions, wastewater discharges, hazardous waste, runoff, or fugitive releases) through reduction in the use of toxic substances, process changes, product changes, etc. In this Action Plan, EPA, in partnership with the States and municipalities, will:

- **Target, for pollution prevention efforts, particular pollutants, geographic areas and/or sources on the basis of their risk reduction potential, among other factors.** Targeted pollutants will include substances of concern as

identified in Lakewide Management Plans (LaMPs)[1] and in the Great Lakes Water Quality Initiative (GLWQI)[2] as well as many of the toxic substances identified in EPA's nationwide 33/50 Program (formerly called the Industrial Toxics Project).[3] Pollution prevention efforts will also be targeted in select geographic areas including Northwest Indiana, the Niagara River, and Milwaukee, Wisconsin in order to concentrate a critical mass of resources to achieve demonstrable environmental benefit.

- **Set interim goals, on the way to virtual elimination, for the reduction in releases of targeted toxic substances and measure progress.** Specific pollution prevention goals for persistent toxics will be developed as part of the LaMP processes. In addition, consistent with the goals of the 33/50 Program, this effort will focus on achieving 33 percent aggregate reduction of releases into all media of the 17 targeted 33/50 Program contaminants by the end of 1992, with 50 percent aggregate reduction by the end of 1995. These reductions will be measured using the Toxic Release Inventory (TRI), with 1988 as a baseline year.

- **Focus governmental institutions and programs, and private sector efforts, on meeting these goals.** This plan details several ways in which this focus will be achieved.

- **Continue to integrate pollution prevention into existing regulatory and non-regulatory efforts.** Pollution prevention is being integrated into efforts such as

---

[1] *Lakewide Management Plans (LaMPs) are multi-media plans being designed to restore beneficial uses in the open waters of the Great Lakes by reducing loadings of critical pollutants, such as persistent toxic substances, into the Lakes. The development and implementation of a LaMP for each lake is required under the Great Lakes Water Quality Agreement, as amended. EPA is currently developing LaMPs for Lakes Michigan and Ontario. LaMP development for Lakes Erie, Huron, and Superior will follow.*

[2] *The Great Lakes Water Quality Initiative (GLWQI) is an effort by EPA, the Great Lakes States, and Indian tribes to establish uniform water quality criteria and related guidance for the Great Lakes Basin.*

[3] *The 33/50 Program (formerly called the Industrial Toxics Project) is an important element of the national EPA Pollution Prevention Strategy. Through this project, EPA has targeted specific chemicals that are reported and tracked in the Toxic Release Inventory and will seek voluntary reductions from the major industrial emitters.*

the GLWQI, LaMPs, Remedial Action Plans[4], enforcement actions, and the permitting process.

- **Ensure effective stakeholder involvement in all facets of this effort.** This will be done through technology transfer workshops, demonstration projects and public outreach efforts. Stakeholders for Great Lakes pollution prevention efforts include industry, agriculture, Federal, State, tribal, and local governments, public interest groups, and individual consumers.

Success with each of these elements is critical to achieve the objective of reducing and/or eliminating discharges of toxic substances into the Great Lakes.

TARGET POLLUTANTS, GEOGRAPHIC AREAS AND SOURCES

As noted earlier, EPA believes that pollution prevention must be central to the Agency's environmental mission. For this reason, one of the primary objectives of the national Pollution Prevention Strategy is to incorporate fundamental pollution prevention concepts into the broad array of Agency environmental activities. At the same time, EPA believes it is important to establish specific objectives and time frames to demonstrate success in critical areas. This plan details several targeted efforts for the Great Lakes Basin. Specific pollutants, sectors, geographic areas and sources have been targeted.

Nationally, EPA has selected, through its 33/50 Program, 17 high priority pollutants as the focus of EPA's efforts for this voluntary pollution prevention initiative. These chemicals were selected according to two basic criteria: risk to human health and the environment, taking into account health and environmental effects data, potential for total exposure over time as well as potential for exposures to multiple toxic substances, and opportunity for prevention. In 1991, EPA will focus initial toxic reduction efforts in the Great Lakes on the 17 chemicals identified under the 33/50 Program.

Regionally, specific pollutants and specific pollutant sources will be targeted for pollution prevention efforts in each Lake through the LaMP process. Unlike the 33/50 Program which focuses on industrial generators, all sources of preventable pollution

---

[4] *Remedial Action Plans (RAPs) specify how contamination in specific Areas of Concern will be remediated or cleaned up. Pollution prevention will protect current investment in cleanup activities by ensuring that future releases of pollutants will not recontaminate an area. Whereas EPA has lead responsibility for the development of LaMPs, states have the lead responsibility for the development and implementation of RAPs.*

will be examined. For each LaMP, the impact of agricultural and urban non-point sources, industrial sources and municipal sources will be evaluated. From the evaluations, the LaMPs will establish load reduction strategies for each Lake.

Both the Lake Michigan and Lake Ontario LaMPs have already targeted specific pollutants for priority attention and consider persistent toxic substances candidates for pollution prevention efforts.

In addition, EPA is using the Lake Michigan LaMP to target - for pollution prevention efforts - substances that are currently discharged, but are not yet documented as impairing beneficial uses. Specifically:

- By June 1991, EPA through the Lake Michigan LaMP process, will develop, for public review and comment, a draft list of candidate critical pollutants of concern specifically for Lake Michigan, containing information on their sources and making suggestions for pollution prevention activities (including recommendations for fast track actions). These activities will be closely coordinated with ongoing pollution prevention activities in the Great Lakes Basin.

- By September 1991, EPA will develop the final list of these pollutants and suggestions for appropriate pollution prevention activities (including recommended fast track actions) to address these pollutants.

In addition to targeting by pollutants and source, several geographically focussed initiatives are underway for pollution prevention such as the Agency's efforts in Northwest Indiana and in the Niagara area. EPA will also support the local initiative underway in Milwaukee. These are described in more detail elsewhere in this Plan.

SET REDUCTION GOALS AND MEASURE PROGRESS

EPA believes that it is important to set performance goals in order to focus effort and measure progress. Since it is important to have specific goals, the Great Lakes pollution prevention effort will be guided by lake-specific, multi-media reduction goals set through the LaMPs and the national 33/50 Program goals.

The LaMPs will establish goals for reducing generation of specifically targeted pollutants. Pollution prevention goals in the LaMPs will target loadings from all sources of pollution, including non-point, non-industrial sources that represent an important part of the overall pollution problem for each of the Lakes.

As noted earlier, the 33/50 Program establishes two goals: first, 33 percent reduction of TRI releases of targeted contaminants by the end of 1992; with 50 percent reduction by the end of 1995. These goals are aggregate goals and are not intended to apply to individual facilities, which may achieve reductions either above or below the aggregate goals.

EPA will take the lead in working to improve the ability to measure pollution prevention success. Unlike the overall environmental protection strategy for the Great Lakes Basin which measures success in terms of concentrations of pollutants in fish and wildlife, reductions in overall pollutant loadings into the Lakes, and protection/restoration of critical habitats, this Pollution Prevention Action Plan is tightly focused on reducing the on-going releases of pollutants. Thus its primary and most direct measure of success is tied to reductions in the amount of pollutants released into any media. EPA will track progress toward the pollution prevention goals using the TRI data base as the initial benchmark against which to measure reductions, while also working to establish environmental indicators to measure progress in restoring the overall health and well-being of the Great Lakes ecosystem. Specifically, EPA will:

Measure Reductions

- Use TRI, with 1988 data as a baseline year, as a benchmark against which to measure reductions in releases. Under the Pollution Prevention Act of 1990 generators are required, as part of the TRI report, to provide information regarding toxic chemical source reduction and recycling.

- Explore using other information sources as interim indicators of progress.

Establish Environmental Indicators

- Develop ecosystem objectives for Lake Michigan by September 1991. Ecosystem objectives for Lake Ontario were proposed in May 1990 and are pending approval by Environment Canada, EPA, New York, and Ontario. Draft Lake Ontario ecosystem indicators will be ready for public comment by September 1991.

- Continue annual collection and analysis of persistent toxic substances in fish from each of the Great Lakes. Sampling will be completed by September 1991.

- Conduct exploratory toxicant monitoring by September 1991 in Lakes Michigan and Ontario to obtain preliminary estimates of toxic substances in the water column.

- Identify what data will be needed to assess ecosystem responses to reductions in pollution levels; these data will be collected as part of a revised and integrated Great Lakes long-term monitoring program by September 1991.

FOCUS INSTITUTIONS: *THE GREAT LAKES POLLUTION PREVENTION CHALLENGE*

This Action Plan will focus governmental institutions and programs and private sector efforts on achieving these reduction goals. In addition to a cleaner environment, cleaner production is being recognized as the key to international competitive advantage. It is important that industries in the Great Lakes Basin are seen as leaders in the field of clean production, for the benefit of both the Great Lakes environment and the region's economic base. Participating in the Great Lakes Pollution Prevention Challenge is one way of establishing that leadership.

The Great Lakes States, in cooperation with EPA, will issue the Great Lakes Pollution Prevention Challenge to all sectors of society through outreach activities, such as mailings, newsletters, and briefings. The States and EPA will challenge these sectors to use prevention techniques to achieve reductions in generation of toxics; to develop new technologies, tools and techniques to prevent pollution; and to begin to establish information and supplier networks necessary to make pollution prevention widespread.

Specifically to launch this effort, the States and EPA will challenge:

- industrial generators in the Great Lakes Basin to incorporate pollution prevention as the preferred strategy for meeting environmental goals;

- agricultural generators to incorporate pollution prevention into farming practices (e.g., organizing collection programs for unwanted/canceled pesticides);

- colleges and universities in the region to incorporate pollution prevention into their engineering, business, and related curricula;

- Federal and State governments to promote incorporation of pollution prevention concepts into environmental decision-making;

- cities, counties and towns to develop programs that facilitate pollution prevention choices for the community (e.g. prevent toxic contamination of urban stormwater, and/or promote energy conservation);

- environmental groups to promote pollution prevention to their memberships and through their activities; and,

- individual consumers to incorporate pollution prevention into their day-to-day decisions, including, but certainly not limited to, minimizing use of household toxic substances and generation of household hazardous waste.

In July 1991, EPA and the States will conduct outreach to encourage participation in the Challenge. The States will develop a regional award program for the Great Lakes Pollution Prevention Challenge, modeled after the Baldridge award for quality. Like the Baldridge award, this award program will have tightly-defined criteria and will be designed in conjunction with industry and research organizations. The most innovative and/or successful projects will be selected for Great Lakes Pollution Prevention Challenge Awards. At the time that the Challenge Awards are announced, there will also be public recognition of all businesses, farms, communities, universities, environmental groups and individuals that have come forward and agreed to meet the Great Lakes Pollution Prevention Challenge.

As part of this Challenge, the States and EPA will convene a working group to examine incentives and disincentives to pollution prevention, especially in the legal and regulatory systems. This working group will include participation from industry, communities, and environmental groups, at a minimum. The working group will evaluate the extent to which increased regulatory flexibility can help to promote prevention. Such an evaluation would include, but not be limited to, incentives for experimental processes and technologies, and incentives to go beyond environmental regulatory requirements.

In addition, this Challenge will provide the framework for the four major new EPA/State initiatives (Automobile Industry, Lake Superior, Urban Non-Point Source Pollution, and the International Pollution Prevention Symposium), as well as other initiatives that will be developed in the future.

WEAVE PREVENTION INTO THE FABRIC OF ENVIRONMENTAL PROGRAMS

It is important to fully integrate pollution prevention into all environmental programs so that reductions in one media are not offset by increases in others. Pollution prevention activities have been included in environmental programs for many years. Now, however, the increasing emphasis on pollution prevention as the cornerstone of

environmental protection efforts is driving environmental program managers to reassess their programs to ensure that pollution prevention is an integral part of all efforts. A key component of this Action Plan is ensuring that the countless opportunities to promote pollution prevention are being fully utilized throughout EPA and State programs. Specifically, in 1991:

- The States and EPA will continue to place a high priority on the Great Lakes Water Quality Initiative in order to establish consistent Great Lakes States Water Quality standards and implementation procedures. Compliance with such standards will provide an opportunity to adopt prevention technologies.

  The timeline for the GLWQI, as established in the Great Lakes Critical Programs Act of 1990, is as follows:

  . by June 30, 1992, EPA will publish final water quality guidance for the Great Lakes system in the Federal Register; and

  . within two years after the final guidance is published, the Great Lakes States will adopt water quality standards, anti-degradation policies, and implementation procedures within the Great Lakes system which are consistent with that guidance.

- EPA recognizes that training is needed to help institutionalize prevention as the strategy of choice in all environmental decision-making and protection activities. EPA is developing specialized courses designed for government employees and industry. In addition, EPA will develop pollution prevention training for its permit writers, using a cross-media, ecosystem focus. This training will consider cross-media impacts and options for promoting pollution prevention in the EPA permitting process.

- EPA will incorporate pollution prevention into stepped-up enforcement efforts for the Northwest Indiana area, the Niagara River, and other areas throughout the Great Lakes Basin, as appropriate. In Northwest Indiana, for example, EPA is actively negotiating to incorporate pollution prevention commitments into consent agreements. In the Niagara River, all industrial sources of toxic substances will be closely examined to ensure that pollution prevention is considered for implementation and incorporation into enforcement actions.

- EPA and the States will incorporate pollution prevention, as appropriate, into the Remedial Action Plans (RAPs) for Areas of Concern in the Great Lakes. Pollution prevention activities will ensure that a remediated area will not become

recontaminated by on-going pollution generation. EPA and the States will provide pollution prevention training for Regional RAP coordinators and RAP stakeholders.

- EPA, in cooperation with other Federal agencies, will promote pollution prevention in the agricultural sector in order to reduce non-point source loadings into the Great Lakes. Programs to promote conservation tillage and to assess overall farm practices are already in operation and will be enhanced. In addition, EPA is producing technical assistance materials for farmers to help them reduce surface and groundwater contamination from agricultural practices. These materials will stress that good environmental practices also make good economic sense. Some of these materials are currently available, while others will be released during the year. This project will be completed by September 1992.

- EPA will work with local governments to incorporate pollution prevention into their programs and responsibilities in two different ways.

  First, EPA will work with Rochester, Minnesota to pilot a household battery recycling project. Batteries are a source of air toxic emissions if incinerated with the general municipal solid waste stream. Community outreach and education material will be prepared. EPA and the community will prepare a "lessons learned" report to summarize program implementation and results, particularly the procedures to establish the recycling program, and the environmental and economic benefits that are realized.

  Second, EPA and Wisconsin will support the Greater Milwaukee Area Toxic Minimization Task force in its effort to develop and implement an overall strategy to promote pollution prevention in the region, including programs for education and outreach. This task force is composed of members of city government, industry, universities, business, environmental groups, and the local sewerage district.

- EPA will support Wisconsin's effort to develop a statewide pollution prevention strategy and integrate pollution prevention into all environmental quality programs. The strategy will focus on specific actions that individuals and industries across the state can take to improve waste management. It will foster technology transfer, innovative approaches and financial assistance for waste reduction particularly among small and medium-sized businesses. Primary emphasis will be directed at facilities that generate toxic pollutants, use toxic/hazardous substances and/or generate hazardous waste. The program will

promote pollution prevention as the best way of complying with new toxic air and water quality regulations.

- In order to involve labor and management fully in cooperative pollution prevention activities within industry's environmental programs, EPA will support the work of the Great Lakes Strategy Board (convened by the Council of Great Lakes Governors) which is charged with identifying and reporting on the "best labor/management practices" that foster pollution prevention.

- To promote adoption of pollution prevention practices by industry, agriculture, and the public, EPA and the Great Lakes States will sponsor over 25 technology transfer conferences or workshops this year. In addition, EPA and the States will disseminate pollution prevention information through activities such as EPA's Pollution Prevention Information Clearinghouse, an electronic database.

- EPA has initiated the Pulp and Paper Regulatory Cluster. The purpose of this cluster is to develop an integrated regulatory framework in which all relevant regulations affecting the pulp and paper industry, such as revised effluent guidelines and Clean Air Act regulations, are considered together to ensure maximum policy consistency and optimal environmental results. In addition to examining regulations in an integrated fashion, the purpose of the cluster is to raise cross-media issues and to consider pollution prevention and other non-traditional approaches to environmental management.

- EPA is launching four major new initiatives with the Great Lakes States. These initiatives were chosen because, together, they address the broad spectrum of pollution prevention opportunities available in the Basin.

  First, in a public/private initiative, EPA and the States will work in conjunction with Chrysler, Ford and General Motors to promote voluntary pollution prevention of persistent toxics that negatively impact the Great Lakes in a significant way. These automobile companies recognize the importance of protecting the Great Lakes ecosystem and acknowledge the goal of reducing discharges of persistent toxics that significantly impact the Great Lakes.

  - These automobile companies will participate with EPA, the States, and other appropriate parties in a basin-wide effort to determine which persistent toxics are of greatest concern to the Great Lakes ecosystem. Once priority persistent toxics have been identified, these companies will evaluate which of those materials are in use in their operations.

- These automobile companies will identify their past efforts to reduce the use and generation of these toxics; establish priorities among the materials of concern for additional in-house pollution prevention efforts; and work with their suppliers to promote pollution prevention efforts for persistent toxics.

- Further, these companies will participate in technology transfer forums to share non-proprietary information on pollution prevention techniques and success stories; and participate in similar forums to share information about their efforts to establish pollution prevention thinking and actions within their companies.

- In addition, these automobile companies commit to continue exploring new pollution prevention opportunities within their facilities for waste streams of concern to their companies.

- As the second major initiative, EPA, in partnership with Minnesota, Wisconsin, and Michigan, will work cooperatively on pollution prevention efforts on Lake Superior. Lake Superior has not experienced the intensive development, urbanization and pollution characteristic of the lower Lakes and has remained relatively pristine. It is the head of the Great Lakes System and does not receive pollution from the other Lakes.

  Although it is the largest of the Great Lakes, Lake Superior is also the most vulnerable to pollution from toxic substances, since toxics tend to remain longer in Lake Superior and once degradation does occur, it takes a longer time for the Lake to recover.

  The U.S. believes that focusing attention on the Lake Superior Basin will build upon the considerable interest within the Great Lakes community for cleaning up Areas of Concern and protecting the rest of this valuable resource from degradation. Public interest also supports the International Joint Commission's call for strong measures designed to protect the Lake. In support of the initiatives, EPA and the Lake Superior States are committed to:

  - Reducing the quantity of persistent toxic substances entering the Lake by building upon and accelerating existing environmental protection programs such as RAPs within the Lake Superior Basin; and preserving the high quality waters of the Lake by developing and reaching agreement on common anti-degradation procedures and programs with the Great Lakes jurisdictions.

- Developing an inventory of basin wide impairments and a consensus on Lake Superior "critical" pollutants using a consultative process involving stakeholders.

- Establishing an improved international air toxic monitoring network in the Lake Superior Basin and conducting modeling to identify major local and distant source areas impacting the Lake. This is needed because Lake Superior is particularly vulnerable to atmospheric deposition of toxic substances due to its large surface area and slow rate of sedimentation. The monitoring network and modeling will enable the U.S. and the Great Lakes jurisdictions to identify the pathways and sources of persistent toxic substances entering Lake Superior and to design pollution prevention techniques for their elimination. In addition, this information will support development of the Lakewide Management Plan.

- Reviewing and strengthen existing environmental criteria for water and air programs and their implementation to ensure that they are adequate to protect the Lake.

- Supporting Minnesota's and Wisconsin's efforts in working with the St. Louis River RAP citizen committees and private sector in developing a multi-media pollution prevention approach to eliminate or reduce major sources of discharge to the western end of Lake Superior.

- Supporting Minnesota's Lake Superior Project which will consist of a multi-media inspection/compliance initiative with an emphasis on pollution prevention. This project is geographically focused within the Lake Superior basin and includes the service area of the Western Lake Superior Sanitary District, home to most of the major industries in Minnesota's portion of the Lake Superior basin.

As the third major initiative, EPA and New York will launch pilot programs in pollution prevention for urban non-point sources. In order to focus on the prevention of urban non-point source discharges in the small quantity generator and household hazardous waste areas, EPA will support New York's efforts to conduct three pollution prevention projects. Specifically:

- New York will conduct an intensive consumer education campaign on household hazardous waste use, disposal and reduction in conjunction with county and municipal governments (Monroe County/Rochester, Erie

County/Buffalo, Niagara County/Niagara Falls and Jefferson County/Watertown).

- In addition, within these communities fact sheets will be developed to inform the public of the potential dangers of lawn chemicals and to assist them in making responsible lawn maintenance choices.

- New York will also work with smaller towns in these counties to help identify non-point pollution sources. New York will develop guidance documents to help local officials discern the origin of non-point source discharges as well as to outline potential local courses of action which may be implemented in order to ensure the reduction of such discharges.

As the fourth major initiative, EPA and Environment Canada will co-sponsor an International Pollution Prevention Symposium in conjunction with the International Joint Commission meeting in the fall of 1991 to highlight the advances made in pollution prevention under this Action Plan and through Canadian activities, and to establish the agenda for future pollution prevention efforts.

ENSURE STAKEHOLDER INVOLVEMENT

EPA believes that a broad-based public commitment to pollution prevention is essential to ensuring the long-term health of the Great Lakes ecosystem. To this end, EPA will look to the Great Lakes stakeholders: States, tribes, regional organizations, industry, trade associations, academia, environmental groups and interested citizens to 'spread the word' and to enlist support for its initiatives. Specifically:

- EPA will compile TRI information regarding releases of targeted toxic chemicals by key industries into the Great Lakes Basin. This information will be available to the public in September 1991.

- EPA will work to enlist stakeholder support as part of on-going LaMP efforts. By September 1991, EPA will convene the Lake Michigan Lakewide Advisory Council, which will include government and public representatives; to provide input into the development of the Lake Michigan LaMP. For Lake Ontario, the existing planning process under the Lake Ontario Toxics Management Plan actively solicits input from all stakeholders and keeps them informed of its progress.

- EPA will support the Council of Great Lakes Governors in its efforts to enhance the involvement in pollution prevention by all stakeholders, including State agencies, environmental groups and the private sector. The Council will coordinate with existing pollution prevention networks throughout the region to disseminate information about the full range of pollution prevention initiatives, from local public education campaigns to industry-specific technology transfer efforts.

- The International Pollution Prevention Symposium, discussed above, will present an opportunity to share information regarding pollution prevention activities with stakeholders in the Great Lakes Basin and to solicit input into ongoing and future activities.

- Finally, EPA, working with the States, will recognize the contributions of participants of the Great Lakes Pollution Prevention Challenge at the September 1991 International Pollution Prevention Symposium.

CONCLUSION

Achieving environmental quality in an industrial society is an immense challenge and the improvements in the quality of the Great Lakes over the last 20 years are a credit to all citizens of the Basin. The time has come now to expand our focus to include preventing pollution at the source. This Great Lakes Pollution Prevention Action Plan outlines the "next steps" that EPA will be taking, in full cooperation and partnership with the Great Lakes States, with industry and agriculture, and with all citizens of the Basin, to create a better environment and to ensure the viability of long-term economic development in the region. EPA is proud to launch this initiative and looks forward to making these cooperative efforts of the Great Lakes Basin a model for the world on how to achieve both the highest level of environmental protection and a prospering economy.