



# NORTHEAST STATES POLLUTION PREVENTION NEWS

THE NORTHEAST WASTE MANAGEMENT OFFICIALS' ASSOCIATION  
(NEWMOA)

Vol. 2 No. 3      85 Merrimac Street, Boston, MA 02114, (617) 367-8558      Summer 1992

## INTRODUCTION

NEWMOA would like to thank Sally Mansur for the terrific job she did as Acting Pollution Prevention Program Manager during the past six months. Sally produced the last two issues of this newsletter, which provided lots of information on various state activities. We look forward to working with Sally in the future in her position as pollution prevention coordinator in the EPA Region 1 Waste Management Division.

Terri Goldberg recently returned to NEWMOA from a six month leave from her job as Pollution Prevention Program Manager. She is eager to energize the regional pollution prevention work group and continue to improve this newsletter. Please call her with ideas and suggestions for the next newsletter and Work Group meeting.

In this edition of the newsletter, we are introducing two new columns: "Training Briefs" and "New Pollution Prevention Publications." The training column will provide information on various PP training programs in the Region. The ideas to use this newsletter to communicate about PP training in the Region was suggested at the recent train-the-trainer sessions in Regions 1 and 2.

We would like to use the training column to provide agendas from recent PP training, updates on training that is available Region-wide, ideas and suggestions for future training, and reflections on the training experience in various states. We will continue to

announce workshops and conferences available in individual states in the column by each state. See page 14 for the first "Training Brief." Please write or call Terri at NEWMOA for suggestions on future columns.

## NEMPP UPDATE

NEMPP has completed a three year strategic plan, and copies are available from the NEWMOA office. The plan outlines PP programs in the following areas:

- continuing coordination of quarterly meetings of state PP staff;

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- providing a forum for resolving issues concerning the integration of PP into regulatory programs;
- developing training on PP for middle managers;
- conducting industry specific PP training;
- continuing to provide training to state officials and firms on financial analysis of pollution prevention projects,
- facilitating inter-state cooperation on TUR facility planning activities,
- helping states address hazardous waste capacity shortfalls through PP activities,
- maintaining a PP clearinghouse and establishing a network of PP Clearinghouses,
- coordinating policy development and strategies to help states assess the effectiveness of their PP programs,
- researching source reduction options for products containing hazardous constituents, such as fluorescent light bulbs and paints, that are disposed as solid waste, and
- assisting states to develop measurements of PP progress in industry and techniques for targeting PP efforts.

We look forward to working with states on these programs. Please call the NEWMOA office if you are interested in working with us on any of these projects.

#### **Training Packet Available**

NEMPP has finalized a training packet on "Costing and Financial Analysis for Pollution Prevention Projects." This packet was designed for use in a workshop sponsored by NEWMOA and the Massachusetts Office of Technical Assistance. The packet was written to introduce state pollution prevention staff to concepts and methods of conducting financial analysis for pollution prevention projects so that

they can more effectively discuss these methods with industry representatives. Copies are available at the NEWMOA office for \$40.00 (\$20.00 for government and non-profit).

#### **Battery Report Available**

Recoverable Resources/Boro Bronx 2000 (R2B2)'s report on battery recycling has been finalized. The report, "Feasibility Study for the Implementation of Consumer Dry Cell Battery Recycling as an Alternative to Disposal, Getting a Charge Out of the Waste Stream" was sponsored by NEWMOA, NERC, and a number of state agencies. To obtain the report, call NERC at (802) 254-3636.

**For more information contact:** Terri Goldberg, NEWMOA, (617) 367-8558.

## **CONNECTICUT**

### **CONNECTICUT DEP**

#### **In-Service Training for Pollution Prevention**

DEP is developing an in-house pollution prevention training program to be offered on an annual basis to DEP employees. The first session will be held this September. DEP is also developing a series of pollution prevention seminars for senior staff to be conducted on a regular basis throughout the year. These seminars will feature the Department's on-going initiatives, emerging pollution prevention issues, and pollution prevention activities being conducted by other agencies.

**For more information contact:** Liz Napier, CT DEP, (203) 566-5217.

### **CONNTAP**

#### **Site Visit Program**

Seven pollution prevention assessments have been conducted at Connecticut facilities by our newly hired retired industry professionals.

## Training

On May 14th, over 40 people attended ConnTAP's first CEO Breakfast. The meeting was cosponsored by United Technologies. The purpose was to convince upper management of industrial companies of the benefits of pollution prevention and to emphasize the importance of management commitment in a pollution prevention program. Vice Presidents from Pratt & Whitney and United Technologies discussed methods to implement pollution prevention at a large facility. Randall Klein, President of Action Circuits, Inc., discussed implementing pollution prevention at a small facility. Presentations were also made by the Connecticut Business and Industry Association (CBIA), the Connecticut Development Authority (CDA), and the Connecticut Association of Metal Finishers (CAMF).

ConnTAP prepared a draft proposal for assisting the Connecticut DEP meet the requirements of the Small Business Assistance Program (SBAP) under the Clean Air Act Amendments (CAAA). ConnTAP plans to provide technical assistance on pollution prevention to aid small business in meeting the emissions limits of the CAAA.

## Miscellaneous

On June 16 ConnTAP will be exhibiting at a business appreciation day in Cheshire, CT. The meeting will provide information to local businesses on financial and technical assistance in waste reduction and other business activities.

**For more information contact:** ConnTAP staff at (203) 241-0777.

## MAINE

### MAINE DEP

The State of Maine became the 10th state in the nation and the 1st in New England to sign on with EPA as a Green Lights Partner. An early estimate shows that the state should see a 25 percent IRR (internal rate of return) on the

lighting upgrade investment. Environmentally, this translates to emissions reductions for CO<sub>2</sub> (21,000 metric tons) SO<sub>2</sub> (177 metric tons) and NOx (76 metric tons) annually.

The State of Maine has been requested to submit a full application for this year's EPA's Pollution Prevention Incentives for States grants program.

**For more information contact:** ME DEP, (207) 289-2811.

### UNIVERSITY OF MAINE

The Maine Waste and Toxics Reduction (WTR) Committee is assembling a list of knowledgeable speakers on pollution prevention topics. The list will be made available to trade associations and other professional groups who need speakers for meetings and conferences. WTR committee members were asked to circulate a form with their organizations. The form asks speakers to list their areas of expertise, geographic areas in which they are willing to give presentations and industry specific experience they bring to the subject.

The University of Maine is organizing a conference on pollution prevention in the auto maintenance industry for November 5, 1992 in Orono. Presentations will focus on the regulation and management of used motor oils, general waste reduction steps, municipal programs and public information strategies. Cooperators include the Maine Auto Dealers Association, the Maine Waste Management Agency, the Maine Department of Environmental Protection, Cooperative Extension, Total Waste Management, Inc. and League of Women Voters.

Student internship programs useful for pollution prevention efforts were compiled recently by the Maine Waste and Toxics Reduction Committee. The listings included programs at public and private universities as well as technical colleges. As of yet, no formal mechanism links Maine businesses in need of

pollution prevention assistance with student programs and faculty advisors.

For more information contact: Nick Houtman, University of Maine, (207) 581-1490.

## MASSACHUSETTS

### MASSACHUSETTS DEP

#### TURA Reporting

DEP has revised the reporting forms and regulations in an attempt to eliminate some common sources of error. The most glaring problem was a lack of understanding of what was meant by waste prior to treatment or "byproduct". In addition, DEP added several optional questions that allowed firms to explain why their "mass balance" for a particular chemical did not work out correctly and why they are no longer reporting on previously reported chemicals. DEP worked with OTA and TURI to provide six training sessions this spring, and are spending a great deal of time providing telephone technical assistance to filers.

This year firms in the service and transportation SIC codes must file and the chemical list has been expanded to include the first third (by CAS number) of the CERCLA chemical list.

The basic reporting data management system has been completed and data entry of the 1990 began on Monday, June 15. The system is presently being revised to reflect the new Form R reporting data, and to include data elements from the Toxics Use Reduction Plan summaries that must be submitted to DEP beginning on July 1, 1994.

#### TURA Planning

DEP promulgated the planning regulations in April. These require that firms complete a process flow diagram identifying points of loss of chemical. Firm must also calculate the costs of using the toxic chemical. Specific cost elements that MUST be

"considered" in the cost calculations are cited, including waste management costs, worker health and safety costs, and potential liability costs. Companies have to implement a process to identify the "universe" of potential TUR techniques applicable to the firm, and then determine which ones of those are appropriate because they are clearly NOT economically and technically infeasible. Firms then must do a comprehensive economic and technical analysis of the "appropriate" techniques. The required technical analysis is limited to an assessment of whether or not the technique is TUR, can be implemented without violating other laws and regulations, and the expected change in the total "byproduct" and use and byproduct per unit of product. The required economic analysis involves evaluating the costs and savings associated with each technique. Assumptions about discount rates, depreciation rates, and payback periods must be consistent with existing company practice.

Companies must choose which techniques to implement and develop an implementation schedule. If the analysis of a particular technique cannot be completed on time, firms must include an implementation schedule for the continuing analysis.

The plans must include a certification statement. The senior management official must certify that the information used to develop the plan and stated in the plan is accurate. The plan must also be certified by a Toxics Use Reduction Planner. She must certify that the plan was done in accordance with the planning regulations.

In addition the plans stay onsite. Only a summary detailing two- and five-year projections of facility-wide toxics use, and byproduct, and a projection of Byproduct Reduction Index for each chemical in each production unit five years from the date the plan is completed must be submitted to DEP.

DEP has begun to work on the Toxics Use Reduction Planner Certification regulations. We expect to have promulgated the regulations, held an exam, and certified planners by next winter.

Multi-Media/Pollution Prevention Biased Compliance (Waste Prevention F.I.R.S.T.): DEP is working to completely implement the "Blackstone" approach state-wide over the next year. We are already working to recategorize facilities so that they can be prioritized in accordance with their status in all media programs as opposed to developing priorities media by media.

### MASSACHUSETTS OTA

The addition of new staff has added a new depth of expertise and experience to OTA. For the past three months much time has been spent in orientation and training in environmental laws and regulations, procedures for doing technical assistance, financial assessment of alternatives, identification of technical and informational resources and the specifics of reporting under the Toxics Use Reduction Act. With a steady flow of requests for assistance, there have been many opportunities for on-the-job training as well.

OTA has sponsored or participated in a number of workshops this spring. The Toxics Use Reduction Institute (TURI), the Department of Environmental Protection (DEP) and OTA collaborated on a series of workshops for TURA filers which were held throughout the Commonwealth. OTA participated with DEP in workshops for auto service facilities. A workshop on Total Quality Environmental Management was presented in Worcester as part of the Central Massachusetts Pollution Prevention Project. As part of the Merrimack Project, funded by an EPA grant, workshops have addressed pollution prevention in electroplating, machine shops and printed circuit board manufacture and assembly. Two workshops addressed the problems of fats, oils and grease for restaurants. The local sewage treatment plants were co-sponsors. NH DES and TURI also participated in the full day seminar on printed circuit board assembly and manufacture. OTA is working with MWRA to hold a July workshop on silver recovery for those involved in photoprocessing.

As DEP expands its multi-media inspection efforts to all areas of the state, OTA staff have met with the regional teams to assist with toxics use reduction training and presentations on industry specific source reduction opportunities. In addition, OTA staff meet regularly with the regional inspection teams to assist with identification of source reduction possibilities.

In addition to its work with DEP, OTA has expanded its regional activities by meeting with planning agencies, advisory committees, Chamber of Commerce and other local groups. The number of requests for on-site technical assistance continues to increase and covers a broad range of industries from plating and metal finishing to fiber optics, textiles, printed circuit boards, plastics and coatings. In an effort to provide more efficient and effective service, OTA has revised their pre-visit questionnaire and have begun to deliver reports directly to the facilities so that OTA can discuss the next steps with the people involved. Previously, reports were mailed to companies.

After intensive review by environmental and industry representatives, the toxics use reduction manual is ready to be printed. A limited number will be printed immediately with a larger printing scheduled for the next fiscal year. Copies will be made available to other state programs as soon as they are ready.

**For more information contact:** Paul Richard, MA OTA, (617) 727-3260.

### MA TURI

The Toxics Use Reduction Institute (TURI) has been actively engaged in establishing a Technology Transfer Center (TTC). The Center was conceived to provide access to the information on toxics use reduction that is proliferating across the United States as well as internationally. TTC is actively acquiring proceedings, technical papers, journals, reference materials, databases on CD-ROM, books and vendor material on industrial processes and chemicals. During the start up phase of the

Center, TURI staff has focused on issues and interests of the MA OTA as well as on TURI's research and education groups. These groups include specific industries such as printing, paper, printed circuit, surface finishing, metal fabrication, and dry cleaning. Other topics of initial focus are cleaning technologies, refrigeration, chemical restriction policies, specific chemicals and implementation strategies.

The TTC has also undertaken a pilot project to deliver information to front line professionals in a manufacturing industry. With the support of the Boston Chapter of the American Electroplaters' and Surface Finishers' Society, the Center has offered a membership and information service. The TTC will send selected technical papers and bibliographies to their shops over the course of a year, and will periodically ask for feedback. Readers from industry will be hired to screen materials to help ensure it is appropriate and unique to the particular industry. As responses confirm that this is a useful service, the TTC will expand the idea to serve other industries.

Over the course of the last six months, TURI presented its first three Toxics Use Reduction Planners (TURP) course to over one hundred individuals. Course attendees represented federal and state government, consulting companies, and area industries such as Altron, Inc., Raytheon and AT&T. The course is being taught at the University of Massachusetts Lowell and Worcester Polytechnic Institute. The course will repeat this fall.

On June 24, TURI hosted a conference on "Design for the Environment". Design for the Environment (DfE) is an engineering design initiative that promotes environmentally sound decisions at every step of the production process. Featured speakers included Walter Stahel, Product Life Institute, Switzerland; Braden Allenby, American Electronics Association Design for Environment Task Force; and Mark Greenwood, EPA Office of Pollution Prevention and Toxics. Over 150 people attended the conference.

TURI has also initiated a Matching Grants Program with Massachusetts businesses. The program is designed to facilitate the development and use of techniques that reduce the use of toxic chemicals or the generation of toxics by-products in Massachusetts businesses. TURI will fund one-half of the costs associated with the project. Funded businesses are required to contribute the second half of the costs. Feasibility studies will also receive \$5,000 for the project and technology studies will receive \$25,000. The application deadline is June 30.

TURI has published a Toxics Use Reduction Research Directory and an Annual Report for 1991.

For more information: TURI, (508) 934-3275.

## **NEW HAMPSHIRE**

### NEW HAMPSHIRE DES

The Hazardous Waste Capacity Assurance/Pollution Prevention staff attended a May 1 - 2, 1992 Capacity Assurance Meeting in Richmond, VA. A substantial amount of time was dedicated to discussions of potential regional waste reduction activities. Preliminary findings of the NEWMOA/EPA/NH/RI Waste Reduction for

CAP Shortfalls Project were presented by NH. A similar project at the regional level is planned.

A pollution prevention walkthrough was conducted at a small snack food manufacturer as a result of a referral by a local POTW official. Feedback from the MA OTA/NEWMOA/NEIETC "Pollution Prevention Pre-Treatment" Seminar in Franklin, NH has indicated a general willingness of NH pre-treatment personnel and the NH DES pre-treatment coordinator to participate in the NH Pollution Prevention Program through a referral system.

An in-house meeting was held in late April to discuss the formation of the NH DES Pollution Prevention Task Force. A memo was sent out in early May to each of the media

division directors to invite appropriate staff to the first Pollution Prevention Task Force meeting on June 9, 1992.

New Hampshire Pollution Prevention (NHPP) staff, in conjunction with Gary Gulka of Vermont's Office of Pollution Prevention, gave a luncheon presentation to NY and VT business representatives on pollution prevention concepts, the set-up of an in-house pollution prevention program and other pollution prevention resources. The businesses present were part of the Montshire Museum's Upper Valley Compliance Officers Network.

NHPP staff met with Joseph Paterno of the NH Industrial Research Center (IRC) to discuss where both of the NH programs may be of mutual benefit. The NH IRC was set up by the NH legislature to assist industry in becoming more competitive through promoting research and development services, developing technology transfer efforts, promoting public/private partnerships, and acting as an information clearinghouse. A distinct feature of the IRC is the availability of matching grant funds.

NHPP staff presented a number of Earthday information tables and lectures for area schools, hospitals, and towns.

A site visit was conducted at a division of a large computer company that specializes in final product disposition. The impressive operation involves routing of usable equipment and supplies to be distributed to other branch facilities, as well as the disassembly of equipment for recycling, re-use, and proper disposal.

NHPP staff attended a MA OTA/Greater Lawrence Sanitary District-sponsored Pollution Prevention Workshop for Electroplaters. This workshop was conducted as part of the Merrimack River Pollution Prevention Project.

Additional coordination and work was accomplished on the NEWMOA Shortfalls Project. After the project reveals industry and process trends contributing to landfill and incineration shortfalls, workshops will be

developed to help the appropriate companies. A meeting was held with NEWMOA, EPA, and the consultant involved in the data analysis to discuss next steps.

A number of meetings were held between NH pollution prevention and NH Business and Industry Association WasteCap staff in order to keep both programs apprised of progress and to identify potential areas for cooperative projects. A number of interesting projects have been put forth, such as co-sponsored workshops to assist pollution prevention volunteers on successful brainstorming and problem solving techniques. Similar workshops may be offered to NH company personnel as well.

Interviews were conducted for a second pollution prevention intern position. The intern will assist in the cataloging of pollution prevention vendor and research information, as well as a number of other important tasks.

NHPP staff presented an overview of the services available through the NH Pollution Prevention Program to assist Federal facilities in New England. This was done as part of an EPA-sponsored workshop entitled "Pollution Prevention for Federal Institutions".

NHPPP staff, working under the auspices of the cooperative Merrimack River Pollution Project, have assisted MA OTA staff by locating two potential speakers for the upcoming June 10, 1992 pollution prevention conference for printed circuit board shops. A letter was sent to NH POTW contacts asking them to both attend and to invite the appropriate discharging companies to the MA OTA-sponsored conference.

**For more information contact:** Vince Perelli, NH DES, (603) 271-3503.

## **NEW JERSEY**

### NEW JERSEY DEPE

The Office of Pollution Prevention (OPP) filed a second pre-proposal with OAL for

publication in the June 1 New Jersey Register. The second pre-proposal serves two purposes: (1) to present comments and responses for issues raised in the March workshops and in written remarks; (2) to outline a direction for regulations under the Pollution Prevention Act. OPP mailed copies of the second pre-proposal to all participants in the workshops for OPP's first pre-proposal. A participatory workshop will be held on Monday, June 15 in the first floor hearing room for facility representatives, environmentalists and members of the general public to debate and offer input on topics raised in the pre-proposal.

On May 28, 1992, Commissioner Weiner signed a Memorandum of Understanding (MOU) with EPA Region II and EPA Headquarters which establishes coordination procedures between the agencies for implementing New Jersey's pilot program in facility-wide permitting. Regional Administrator Constantine Sidamon-Eristof and EPA Deputy Administrator F. Henry Habicht were the EPA signatories. The MOU spells out coordination procedures and the ways EPA will help advise, monitor and evaluate this pilot effort in implementing pollution prevention measures.

As part of the industrial profiles project, OPP staff visited two facilities in May: Garden State Paper, Inc., Elmwood Park, and Homasote, Inc., West Trenton. OPP staff toured both sites with facility personnel and discussed the possible barriers or incentives to pollution prevention. Work on the profiles project this month also included an investigation of economic data on New Jersey facilities available electronically through the State Library. The staff has also examined the availability of the Department's electronic data on wastewater effluents, including aggregated yearly discharges and acute and chronic toxicity.

On May 21, 1992, the facility-wide permit team and other OPP staff attended a pollution prevention training session conducted by Hampshire Research Associates (HRA) of Alexandria, Virginia. HRA consultants addressed the basic concepts in pollution prevention, including what is involved in preparing a

pollution prevention plan and how pollution prevention can be incorporated into the permitting process. Those EPA Region II staff who will be working with the Department on the facility-wide permit project also attended the session. HRA will be providing ongoing training for the facility-wide permit team throughout the program and will hold an additional training session this fall geared to a larger audience of permit writers, enforcement inspectors and other staff.

The Office of Pollution Prevention recently completed and had approved a contract with the Robert Wood Johnson/University of Medicine and Dentistry of New Jersey's Environmental and Occupational Health Institute to conduct an investigation of the existing barriers for employing integrated pest management practices in NJ agricultural lands. This project will involve a pilot survey of approximately 30 farmers in NJ on what factors limit their reduction of the use of toxic agrichemicals.

#### Policy Issues

OPP has completed its second pre-proposal for the pollution prevention program requirements. The sixty page pre-proposal includes summaries of comments received on the first pre-proposal, responses to the comments, and recommendations or positions to elicit further public comments. The three most contentious issues appear to be: Part I targeting; the definition of in-process recycling (which will count towards a facility's pollution prevention goal); and input-use exemptions (an exemption which allows a facility to set a use reduction goal of zero). The second pre-proposal will appear in the June 1st New Jersey Register, and DEPE will conduct one interactive public workshop on the pre-proposal issues on June 15 in the DEPE public hearing room. OPP is sending the pre-proposal directly to participants in the first pre-proposal workshops to promote public and industry interaction. A considerable portion of OPP's time was spent during the month of April preparing the pre-proposal, including researching technical issues, meeting with industry and



environmental representatives, conferring with the DAG's office, and writing rule language.

OPP met with the contractor, Waste Advantage Inc., who is providing technical assistance for preparing a pollution prevention plan (PPP) to the volunteer facilities in the facility-wide permit program. The department is paying for Waste Advantage's services through a contract with the New Jersey Technical Assistance Program (TAP). The TAP also attended the meeting and will be following the activities of Waste Advantage Inc. The department will not be directly involved in reviewing the recommendations Waste Advantage provides to the companies. This will help ensure the confidentiality of detailed process information needed to develop a PPP.

**For more information contact:** Steve Anderson, NJDEPE (609) 777-0082.

## **NEW YORK**

### **NEW YORK DEC**

#### **Hazardous Waste Reduction Plans (HWRP)**

DEC's first year of HWRP review is coming to a close. On July 1, 1992 annual status reports are due from generators and TSDs who reported by July 1, 1991. In addition, generators of greater than or equal to 500 tons of hazardous waste are required to submit HWRP by July 1, 1992.

Many facilities (in particular large generators) are finding it hard to prepare waste indices. Progress continues in this area, and DEC will keep you informed if any major progress is made.

#### **Multi-Media Checklist**

The checklist is now being trialed in New York State's Region 4 and unofficially in Region 9. Region 4 plans to use the checklist at 40 facilities ranging in size from small service stations to large generators.

## **Pollution Prevention Regulations - Part 378**

Comments from industry, associated business groups and environmental groups have been incorporated. Department staff are reviewing changes before sending them to legal for a final review.

### **Pollution Prevention Conference**

The Fifth Annual Pollution Prevention Conference began on the evening of June 1 with a welcoming reception and the opening of registration and the exhibit area. On Tuesday, June 2, over 250 attendees listened to opening remarks and a panel discussion on the role government should play in business decision-making, and vice versa. The panel was made up of top executives from government and industry. The afternoon broke up into concurrent sessions with NYSDEC presenting their perspectives on multi-media pollution prevention in one session and Environmental Enforcement in the other. The conference closed on Wednesday, June 3, 1992 after case studies presentations were made demonstrating that pollution prevention pays.

**For more information contact:** Dennis Lucia, NY DEC, (518) 457-6072.

### **ERIE COUNTY PP PROGRAM**

Activities conducted during this reporting period primarily focused upon providing pollution prevention assistance to companies which have requested help and investigating new avenues for program expansion.

ECOPP staff has met with Public Economic Development officials, State University of New York at Buffalo officials, and Commercial Lending Institution representatives to discuss mechanisms for expanding program services through special projects with these parties. Public officials and Commercial Lending officers interface with industry on a routine basis and provide an excellent opportunity for the transfer of pollution prevention information.

A meeting of the entire advisory board was held in May to update members about current program activities and discuss new program initiatives. A letter and survey soliciting companies with new waste reduction technologies for evaluation through the Erie County WRITE Program was distributed to approximately 5,000 facilities in January. As a result of this survey, 60 companies requested on-site technical assistance.

19 of the 39 site reviews conducted November 1991 - April 1992 involved vehicle maintenance facilities. A standard package of recommendations, pollution prevention equipment, and alternative raw materials has been compiled for these facilities. The major barrier to pollution prevention implementation seems to be a lack of capital to invest in recycling and pollution prevention equipment. Most of the facilities generate quantities of waste too small to justify equipment purchases. We have been working through the trade associations to organize equipment sharing.

One of the facilities requesting assistance was an automotive plant. The plant is not a small business, however, the development of a working relationship with a business of this nature could open a door to the several small auto industry suppliers. A preliminary site review was conducted. Effort has been made to obtain information concerning the National Automobile Pollution Prevention Initiative from Marcia Horan of the State of Michigan Office of Waste Reduction Services. According to the representative at the plant, a major barrier to pollution prevention which he faces is corporate policy. Erie County hopes to catalyze a change in prohibitive policies.

ECOPP staff represents the state of New York on the advisory board for a pollution prevention teleconference series being developed through a Great Lakes protection fund grand awarded to the Cleveland Advanced Manufacturing Program.

An environmental notice bulletin has been compiled to inform companies of the new requirements restricting the concentrations of heavy metals in packaging materials.

A majority of the policies under consideration are based upon incentives for industry to implement pollution prevention techniques. Our advisory board has steered us away from imposing new requirements which force implementation. The imposition of new rules and regulations would remove the flexibility companies have in investigating options and the financial resources available for implementation.

As we enter the third year of this effort our primary focus is establishing resources to continue and expand our assistance to industry. The number of companies we have introduced to pollution prevention opportunities reflects industry's interest and support for our program. Small businesses play a major role in the Erie County economy. Erie County has a responsibility to assist small businesses through educational and technical assistance programs to help them prevent the generation of pollutants and find more efficient ways of doing business. ECOPP's mission is to investigate new effective ways to help industry and to identify resources to provide this service.

**For more information contact:** Thomas Hersey, Erie County OPP, (716) 858-7674.

#### SUFFOLK COUNTY WATER AUTHORITY

Over the past few months, the Suffolk County Water Authority's Source Reduction Program has:

- Performed compliance assessments and waste minimization audits at automobile dealerships within the county.
- Published and distributed waste minimization fact sheets for the vehicle maintenance and dry cleaning industries. These fact sheets will be distributed to all Suffolk County establishments within the selected commercial sectors.
- Instituted a student internship program to address pollution prevention and resource planning issues.
- Met with several of the environmental commissioners for the various towns in Suffolk County. The purpose of these meetings is to foster cooperative partnerships and to increase interagency communication.

- Submitted a proposal for an EPA Environmental Education Grant. The proposed project, entitled "Community-Wide Groundwater Education: a Two-Tiered Approach", will develop and administer training to the public and commercial sectors.
- Assisted automobile dealerships in Suffolk County in developing clean-up programs at their facilities.
- Responded to requests from junior high school students from a local school district for information and literature on water conservation and pollution prevention.
- Conducted waste minimization audits at service stations and auto repair shops within the county.
- Assisted a New York City agency and a municipality from a neighboring county in developing antifreeze recycling programs for their fleet vehicles.

For more information contact: Pierre Delice, SCWA Source Reduction Program, (516) 563-0308.

## **RHODE ISLAND**

### **RHODE ISLAND DEM**

Rhode Island DEM, NEWMOA, EPA and other Rhode Island state agencies and organizations are sponsoring a two day state-wide pollution prevention conference in Warwick, RI, September 30-October 1, 1992.

For more information contact: Richard Enander, RI DEM, (401) 277-3434.

## **VERMONT**

### **VERMONT DEC**

The Vermont Pollution Prevention Division has completed development of its Toxics Use Reduction and Hazardous Waste Reduction guidance document and guide to planning requirements for large quantity generators of hazardous waste. A series of five workshops

were held around the state during the week of May 18 to introduce environmental engineers and facility managers to the new Pollution Prevention Division, its function, and the new plan requirements. Additional workshops are planned for the coming months to provide more planning and technical assistance. Plans are required of large quantity hazardous waste generators (Class A generators) by October 1, 1992, and for small quantity generators (Class B generators) by July 1, 1993. Users of toxic substances will be required to submit plans in 1995.

During the summer the Pollution Prevention Division will be conducting a series of industry focus groups in which facilities with similar processes will be brought together to discuss opportunities that exist to reduce the use of toxic substances and the generation of hazardous wastes.

The Division hopes to have its retired engineers and professionals (REAP) program under way to provide on-site waste reduction technical assistance to Vermont businesses. The division has also developed an internal workgroup, the Pollution Prevention Task Force, that is composed of representatives from each of the departments, divisions, and media programs. The workgroup will explore ways that state government can encourage multi-media pollution prevention through its regulatory, technical assistance, and educational programs.

The Pollution Prevention Division has scheduled a series of five workshops for the vehicle service industry. The workshops will focus on pollution prevention opportunities and practical strategies as well as compliance issues. The dates and locations for these workshops are as follows:

- Wednesday, August 26 - Burke Mountain Ski area, Route 114, Burke
- Wednesday, September 2, Sheraton Inn, I-89 Exit 14W, Burlington
- Wednesday, September 9, Lake Morey Inn, I-91 Exit 15, Fairlee
- Wednesday, September 16, Mt. Snow Ski Area, Route 100, Dover
- Wednesday, September 23, Holiday Inn, Route 7, Rutland

For more information contact: Gary Gulka,  
Pollution Prevention Division, (802) 244-8702.

## **EPA REGION 1**

### **WASTE MANAGEMENT DIVISION (WMD)**

Representatives of the WMD have participated in a number of meetings of the "Pitstops Project" this spring. Recently, a group of EPA staff from each media program has met to discuss and finalize the draft work plan for this project. The project's focus is on P2 for Automotive Maintenance Facilities, and will involve putting together a multimedia pollution prevention brochure, industry workshops, and conducting on-site technical assistance. "Core members" of the Implementation Team for the project (one EPA staff person from the Air, Waste, and Water Divisions) will summarize this project and get state input at the next NEMPP Workgroup meeting.

The WMD is again sponsoring a research project for a group of Tufts University Masters Degree candidates. The Hazardous Materials Management Program students will be preparing a guide to pollution prevention in wood furniture finishing with the guidance of their advisor, Dr. Robert Pojasek. The report will present information on current operating practices in this industry, pollution prevention methodologies, cost analysis, and the decision-making process. The report will be presented at a forum at Tufts on July 22, and the final report will be completed in early August.

The WMD is participating in a regional project to bring Supplemental Environmental Projects (SEPs) into the mainstream of the Region's enforcement activities. The WMD is particularly interested in this project because it has had difficulties finding candidate RCRA facilities that will agree to conduct SEPs as part of their enforcement negotiations with EPA. The WMD and representatives of the Air and Planning and Management Divisions are discussing specifications of a data management system to track SEPs in the Region.

A number of WMD representatives presented information at a regional conference of the Air and Waste Management Association. During a session on integrating P2 into RCRA, details on the development and status of EPA Headquarter's Waste Minimization Action Plan and on Region I's Strategic Plan and P2 Work Plans were offered to the conference participants. Another WMD representative offered information on EPA's multimedia inspection experiences during the same session.

A WMD representative presented information at a Federal Facilities Conference on state P2 activities and the Northeast Waste Management Official's Association (NEWMOA) Pollution Prevention Program in May.

The WMD is working with the Massachusetts Office of Technical Assistance (OTA) for Toxics Use Reduction on its EPA grant project to prevent and reduce contributions of toxics to POTWs in Western Massachusetts. The project is focusing on homeowner and small business wastes that, when discharged to sewers, causes the POTWS to exceed their critical effluent parameters. OTA and a project implementation group of local environmentalists, EPA, and POTW representatives will be sponsoring a series of workshops on household toxics as well as a household toxics collection program. The WMD will put together a workshop on automotive maintenance and waste reduction.

The WMD is participating in a grant project with the Tufts University Center for Environmental Management and NEWMOA to train middle managers in the Massachusetts Department of Environmental Protection on pollution prevention and toxics use reduction. The course will offer information on the P2 hierarchy, how to utilize in-house P2 resources, and recognizing P2 opportunities. A representative of the WMD will facilitate small group discussions at this training course.

For more information contact: Sally Mansur,  
EPA Region 1, (617) 223-5529.

## PP PROGRAM

### **Heavy Metals Conference**

EPA Region I and EPA Headquarters will co-sponsor a Solid Waste Heavy Metals Source Reduction Conference in Providence, Rhode Island in December. The focus will be on challenging industry, government, academia and environmental groups to devise ways to voluntarily reduce or eliminate lead, mercury and cadmium in consumer products. People interested in attending should contact Region I to express their interest and propose how they can contribute to the conference.

### **TRI Outreach**

Now that EPA Headquarters and OMB have issued the 1991 TRI Reporting Package, which incorporates the new pollution prevention data elements, Region I will hold six workshops throughout New England this summer to train facilities in the use of the form.

### **Auto Shop Brochure**

Region I's Preventing Pollution in the AUTO REPAIR BUSINESS will be available in June. The booklet focuses on ground water protection issues and is designed to assist auto repair operations with the minimization and management of their materials and wastes. The booklet presents incentives for pollution prevention, case studies of New England operations, a self-audit checklist, and a list of Region I state regulatory and technical assistance program contacts.

### **Energy**

The Region I ENERGI (the EPA NorthEast Region Green Initiative) conference -- covering the Green Lights, Golden Carrot and Green Computer programs -- held on May 11 in Boston was a great success. The States of Massachusetts and Maine signed onto the Green Lights program in a ceremony involving William Reilly and Region I Administrator Julie Belaga. Other signatories included MIT, Tufts, LL Bean and Bath Iron Works.

## **Clean Air Act RACT**

The Clean Air Act Amendments (CAAA) of 1990 require that volatile organic compound (VOC) reasonably available control technology (RACT) be adopted in ozone nonattainment areas rated moderate or worse and in the Ozone Transport Region for all control technique guideline (CTG) categories by November 15, 1992. Region I states are currently in the process of drafting rules to meet these requirements. EPA Region I has provided several states with suggestions for incorporating pollution prevention requirements into rules for solvent metal cleaning, surface coating of metal parts, and non-metal coating operations.

### **Strategic Planning**

Pollution Prevention Workplan Writing Teams in each Region I Division and Office are completing the final versions of their Pollution Prevention Workplans for FY93. Although the level of resources devoted to pollution prevention will not reach the targeted 15% in the first year of applying this planning process (FY93) due to tight budgets and difficulty disinvesting in other programs, the Region has greatly expanded the number of staff and amount of resources devoted to pollution prevention.

Pollution prevention will be featured as a top priority again in the next cycle of Strategic Planning, to be implemented in FY94. This summer we will renew the struggle to devote 15% of our resources to pollution prevention!

### **New England Pollution Prevention Council**

EPA Region I and the New England Pollution Prevention Council (co-chaired by Regional Administrator Julie Belaga) are participating in a diverse, region-wide group called New England Transportation Coalition (NETCoal) to promote regional transportation planning that will fully incorporate environmental and economic concerns. The NEPP Council is also planning a second Pollution Prevention Transportation Forum for this winter, and a number of other projects related to ground-level ozone pollution and transportation.

## **Training**

The Region I Pollution Prevention Training Committee will hold a series of monthly lunchtime learning seminars for EPA staff over the summer and early fall, to follow up on a request from participants in our Pollution Prevention Awareness Seminars for more information about ways to practice pollution prevention at home and in the office. Expert speakers will present on the following topics: sustainable gardening, composting, water conservation, energy conservation, transportation and the environment, and green consumerism.

As soon as our Pollution Prevention Workplans are in final form and our senior staff has had a chance to ponder the training implications of these plans, the Training Committee will begin to develop pollution prevention training for specific categories of EPA Region I personnel. This will probably include inspectors, permit writers, and other enforcement staff. State staff will be invited to these trainings.

### **33/50 Program**

Region I has drafted the agenda for the 33/50 Program Workshop on Pollution Prevention, sponsored by ORD, to be held on September 14, 1992 in Framingham, MA. Speakers from industry and consulting firms will present their reasons for joining the program, and afternoon seminars will train participants on such topics as "Cost Reductions Through Toxics Use Reduction (TUR)," "Pollution Prevention in the Fabricated Metals Industry," "How to do a Waste Audit in Your Facility," and "Metals and Acids Recovery."

Region I 33/50 staff continue to take every opportunity to advertise the 33/50 program to potential participants in Region I. Please contact Dwight Peavey (617) 565-3230 if you see an opportunity to include a 33/50 speaker in an event you are planning.

### **Enforcement**

Region I continues to emphasize Supplemental Environmental Projects (SEPs) in

enforcement settlements as a way to help violators achieve and go beyond compliance through pollution prevention. Recently, Madico, Inc., a window film and fabric-coating firm in Woburn, Massachusetts, agreed to pay a \$30,000 penalty and to undertake an innovative environmental project to settle an EPA complaint for violations of chemical emissions reporting requirements. The company will develop a new formula for its scratch-resistant coating and redesign its coating process, enabling the company to reduce its usage of toluene by 90% and methyl ethyl ketone by 50%. The project will cost the company approximately \$54,000.

### **Grants**

In the current competition for Pollution Prevention Incentives for States grants, five Region I states (plus one Indian Tribe and two Region II states) passed the preproposal stage and were among the top 21 organizations nationwide asked to submit full proposals. Congratulations again to the Northeast states for your excellent ideas and grant-writing skills! Five other worthy proposals from Region I states did not make the first cut; this was largely due to the small amount of funds available for states that have received PPIS funds in the past, and to the stiff competition (117 proposals were received!).

Incorporating pollution prevention into EPA base grants to the states will be one of four main topics of discussion at EPA Region I's meeting with the New England state environmental commissioners June 18-19 in Nashua, NH. This is in response to both state interest and EPA Region I priorities, and coincides with a push at EPA Headquarters to plan a substantial role for pollution prevention in base grants for the FY94 grants cycle.

### **Awards**

Two Region I organizations were among the 17 winners of the 1992 EPA Administrator's Awards for PP, announced May 13. Statler Tissue of Maine was one of six business winners, and the Buttermilk Bay Project (the planning boards of Bourne, Plymouth and Wareham) was

one of seven government winners.  
Congratulations!

**For more information contact:** Abby Swaine,  
EPA Region 1, (617) 565-4523.

## TRAINING BRIEFS

Pollution prevention training activities are exploding in the Northeastern states. The descriptions of state activities in this newsletter mention a number of training programs that states and EPA are conducting for their environmental agency staff and for industry. I hope we can use this column to share information on the content and format of these training activities. I plan to invite various PP trainers to share their ideas in future "Training Brief" columns.

NEWMOA and EPA recently sponsored train-the-trainer workshops in EPA Regions 1 and 2. The workshop participants made the following suggestions for next steps:

- Convene a meeting of PP trainers within the next year;
- Circulate agendas of training programs offered by the states;
- Film trainings and share videos;
- Communicate through this newsletter;
- Invite each other to train and co-facilitate training;
- Use NEWMOA staff to co-facilitate training; and
- Make good case studies available.

As indicated, the groups asked for more information on case studies and materials to present during training. There are a number of good sources of case studies to use during pollution prevention training. I cannot cover all of them in this column, but the following is a list of a few that readers may not be aware of:

- The following state agencies publish case studies: Connecticut Technical Assistance Project (ConnTAP); California Department of Health, Toxic Substances

Control Division, Alternative Technology Section; Massachusetts Office of Technical Assistance (MA OTA); Minnesota Technical Assistance Project (MnTAP); and New York Department of Environmental Conservation (NY DEC) Pollution Prevention Program.

- Case Studies in Waste Minimization, Government Institutes, October 1991.
- Pollution Prevention Review, published by Executive Enterprises Publications, Co. is a quarterly journal that publishes case studies on a regular basis.

You can contact the listed agencies or publishers directly or the NEWMOA office for copies of these case studies. In future columns, I will try to include other sources of case studies that readers can use in training.

I plan to follow-up on the other suggestions from the train-the-trainer group in the next few months and welcome additional training suggestions from readers of this newsletter.

**For more information contact:** Terri Goldberg,  
NEWMOA (617) 367-8558.

## NEW POLLUTION PREVENTION PUBLICATIONS

The following is a list of new publications on PP: "Pollution Prevention in Publicly Owned Treatment Works, Proceedings from State/POTW Grant Recipients Workshop", U.S. EPA Pollution Prevention Division, Office of Pollution Prevention and Toxics, February 1992.

"Total Cost Assessment: Accelerating Industrial Pollution Prevention Through Innovative Project Financial Analysis With Applications to the Pulp and Paper Industry", U.S. EPA Office of Pollution Prevention, December 1991.

"Alternative Approaches to the Financial Evaluation of Industrial Pollution Prevention Investments", U.S. EPA Office of Pollution Prevention, November 1991.

"Improving Performance in the Chemical Industry, 14 Steps Toward Pollution Prevention", Chemical Manufacturers Association, March 1992.

"The RCRA Waste Minimization Action Plan", U.S. EPA Waste Minimization Task Group, May 1992.

"Aqueous and Semi-Aqueous Alternatives for CFC 113 and Methyl Chloroform Cleaning of Printed Circuit Board Assemblies", U.S. EPA Air and Radiation, June 1991.

"Toxics Use Reduction Research Directory", The Massachusetts Toxics Use Reduction Institute, University of Massachusetts, 1992.

All of these materials are available from NEWMOA's Pollution Prevention Clearinghouse or the listed publishers.

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## ADDITIONAL UPCOMING EVENTS

● International CFC and Halon Alternatives Conference, September 29-October 1, 1992 in Washington, DC. Call (301) 695-3765 for more information.

● Minimization and Recycling of Industrial and Hazardous Waste '92, September 22-24, 1992 in Arlington, VA. Call (301) 982-9500 for more information.

● MWRA and the Printing Industries of New England are sponsoring a conference, "Focus on Silver: Pollution in Photoprocessing", Wednesday, July 22, 8:00 A.M. - 2:30 P.M., Ramada Inn, 15 Middlesex Canal Park Road, Woburn, MA. Call Ray Crystal or Mary Robinson (617) 242-6000 x4900 for more information.

● EPA Region 1, NESCAUM, the Frabricare Institute and others are sponsoring a conference, "PP in the Dry Cleaning Industry", September 17 at the Best Western Hotel in Waltham. Call Janet Beloin (617) 565-2734 for more information.

● The Fall meeting of the National Roundtable of State Pollution Prevention Program will meet October 21-23 at the Sheraton Hotel in Lowell, MA. Call TURI (508) 934-3275 for more information.

● "International Symposium on Pollution Prevention in the Manufacture of Pulp and Paper, Opportunities and Barriers", August 18-20, 1992, Washington DC. Call (800) 726-4853 for more information.

● "Promote Landfill Alternatives Now! (PLAN): Solutions for Industrial Solid Wastes", National Teleconference, September 15, 11:30 AM. Call (615) 242-2456 for more information.

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NEWMOA would like to thank the following people for helping to write and produce this newsletter: Liz Napier, Rita Lomasney, Mickey Kuhns, Nick Houtman, Suzi Peck, Paul Richard, Vince Perelli, Steve Anderson, Dennis Lucia, Tom Hersey, Pierre Delice, Gary Gulka, Sally Mansur, Abby Swaine, Beverly Johnson and Terri Goldberg. Special thanks to Lois Makina at NEWMOA for typing the newsletter. Terri Goldberg managed production of the newsletter.

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