



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

September 17, 2007

Name
Title
Company Name
Address

Re: Ohio EPA's New *Tox-Minus* Initiative

Dear (Name):

As an Ohio business leader, you have the difficult task of managing a complex business in an increasingly competitive global market in which maintaining profitability can be extremely challenging. Obviously, such profitability is necessary - not only to survive, but to help Ohio's overall economy and standard of living through the provision of needed products, the provision of jobs and benefits, the payment of taxes, *etc.*

At the same time, you are in a unique and privileged position to foster and maintain the necessary balance between a strong economy and a clean and protective natural environment. I think you will agree with me that the citizens of Ohio (including you and me, our families, and our respective employees and their families) desire both a healthy economy in which to prosper, and a healthy environment in which to live, work, and play.

As the Director of Ohio EPA, it is my business to consider this delicate balance every day. And, during my first seven months on the job, my staff and I have given considerable thought to developing new approaches which will not only make Ohio's environment cleaner, but which will also enhance Ohio's opportunity for economic growth and development. To that end, I have determined that one such approach is to try to reduce chemical releases into the environment so that Ohio is no longer at the top of the national rankings under the Toxic Release Inventory (TRI) program. In my view, reducing Ohio's TRI emissions will not only reflect and result in a cleaner environment, but will also help Ohio better position itself as a progressive state which desires to attract businesses and workers who value, and indeed may profit from, **everyone's** desire for a clean landscape, clean air, and clean water.

I cordially (but emphatically) invite you to help me achieve this goal of finally getting Ohio off of the "leader board" of chemical releases.

In launching Ohio EPA's *Tox-Minus* initiative, I am initially asking 100 of Ohio's top TRI reporters to voluntarily identify feasible and effective pollution reduction or prevention strategies (e.g., process changes, material substitutions, additional pollution controls, *etc.*) which they have implemented or

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

will implement and which will reduce their emission to air, water (excluding discharges to POTWs) and on-site or off-site waste disposal. Here are some key aspects of *Tox-Minus*:

- Participation is completely voluntary. There are no inspections, no penalties, nor any enforcement activity associated with the program.
- The program is intended to demonstrate how companies and Ohio EPA can work together in a cooperative fashion to improve Ohio's environment.
- It is a significant step toward a long-term goal of moving Ohio down in the TRI rankings, which will help enhance our image as an environmentally proactive, yet economically competitive state.

I realize that taking action to reduce chemical releases is not necessarily a quick or easy process, and that such action must coincide with strategic planning decisions made within an organization. Therefore, we are providing companies the opportunity to participate in the program for a five-year period, or longer if necessary, to achieve meaningful reductions in waste or chemical releases to the ambient environment.

To join this initiative, I ask that you do the following by October 15, 2007:

1. **Set reduction goals for your Ohio facility(ies).** You can specify reduction goals in your commitment letter (see below), or submit them later, as specified in the attached implementation strategy. Ohio EPA is not setting mandatory reduction goals for companies. We want each company to identify its own reduction goals for the TRI chemical releases it wishes to target. These goals can encompass reducing waste, air emissions, and/or water emissions. Also, we do not care if your release reduction goals derive, in whole or in part, from mandatory federal or state requirements unrelated to TRI reporting requirements (e.g., Clean Air Act requirements). All we are seeking is a commitment to achieve reduced TRI releases. However, we do ask that your reduction goals use 2007 as the base year and cover a five-year time frame, or longer.
2. **Submit a letter to Ohio EPA with your commitment to participate in the initiative.** You would complete an initial plan briefly outlining the steps you will take to reduce TRI releases. Participants also agree to provide a brief annual report on their accomplishments. You do not need to submit any business confidential or proprietary information as a part of your reporting. Rather, we want to highlight success stories from those Ohio companies working to reduce emissions by using information that can be shared publicly.
3. **Identify a facility-level contact who can work with Ohio EPA on this initiative.** You may identify a contact for each of your Ohio facilities or a single contact to represent all of your facilities.

Within the next few days, we will publicize the launch of *Tox-Minus*. We anticipate there will be media interest and your company may receive calls. After the October 15, 2007 deadline, we will publicize the names of the companies who have joined the program, as we believe those companies who choose to participate deserve public credit and recognition.

I will also be available, if desired, to meet personally with individual facilities and their management to discuss the program and encourage your support. Indeed, I will be following up this letter with a phone call to discuss the program with you and to get your initial reaction.

The attached list identifies the companies we have selected as potential participants, based on the most recent publicly available TRI reporting data (2005). A more detailed implementation plan is also enclosed for your review. If you would like to participate, please provide your letter of commitment, reduction goals (if known) and facility contact information by October 15, 2007, to:

Mike Kelley
Ohio EPA
Office of Compliance Assistance and Pollution Prevention
P.O. Box 1049
Columbus, Ohio 43216-1049.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is available to provide technical assistance and help your company identify pollution prevention and reduction opportunities. I'd like to emphasize the OCAPP is a non-regulatory office within Ohio EPA with a goal of helping businesses achieve compliance and identify pollution prevention strategies. The office does NOT share information it receives with agency inspection or enforcement programs.

If you have questions regarding OCAPP's services in general, or our new *Tox-Minus* initiative in particular, please contact Mike Kelley at (614) 644-2930 or visit our Web site at www.epa.state.oh.us/occap/tox-minus.html.

Thank you for considering joining us in this important initiative.

Sincerely,

Chris Korleski
Director

Attachments