

Pollution Prevention Integration Quarterly Report

Fourth Quarter (FY 01) - April through June 2001

Introduction

The Pollution Prevention Integration Quarterly Report is completed by the Office of Pollution Prevention (OPP) in order to document pollution prevention regulatory integration activities performed by Ohio EPA's divisions and district offices. Ohio EPA continues to investigate and focus on more pollution prevention regulatory integration for its functions. The Agency's Strategic Management Plan, grant commitments and other documents all contain commitments and provisions for pollution prevention regulatory integration.

Office of Pollution Prevention

(Please refer to the Office of Pollution Prevention's quarterly reports for more detailed information.)

Environmental Management Systems Training

OPP, in conjunction with their contractor, Amethyst Group, Inc., provided in-house training for Ohio EPA staff on ISO 14000 on June 13 and 14 at the Lazarus Government Center. Staff attending this training learned about environmental management systems (EMS), the ISO 14000 standard and the ISO 14000 certification process. The training also included information on preparing and auditing an EMS. Staff response for this training was overwhelming and OPP was able to easily fill all 40 openings. A second session for 40 staff was held at NEDO on June 26 and 27.

Mercury Discussion Group/Ohio Mercury Reduction Workgroup

OPP helped coordinate meetings of the mercury discussion group which included representatives from Bowling Green State University, the Department of Education, Public Utilities Commission, Ohio Department of Health, Ohio Environmental Education Fund and Division of Air Pollution Control. The discussion group has received approval to formalize into the Ohio Mercury Reduction Workgroup. The meetings also focused on organization, accountability and reporting activities. In addition, the group has discussed ways to enhance mercury information on Ohio EPA's Web site. Subgroups were formed to help coordinate ongoing education initiatives and to review statewide mercury data. The education subgroup discussed the appropriate response to a U.S. EPA Region 5's letter to school superintendents encouraging mercury awareness and reduction activities. The data evaluation subgroup began to identify sources of mercury data relevant to Ohio.

P2 Supplemental environmental projects (SEPs)

OPP reviewed and commented on the City of Upper Arlington P2 SEP report for DHWM in May.

P2 in permits, rules and compliance assistance

OPP reviewed and commented on Cooper Tire & Rubber Company's Zinc Pollution Prevention Plan submitted to comply with Cooper's Indirect Discharge Permit requirement for DSW on April 5.

OPP reviewed and provided comments to DHWM for Bayer Corporation's waste minimization report update on April 19.

OPP reviewed and provided comments to DHWM on Hukill Chemical's biennial waste minimization report.

Division of Air Pollution Control

DAPC P2 Team***MACT/OPP Rule Package***

The MACT Team in conjunction with the OPP sent out a rule notification package to facilities that may potentially be subject to the Metal Coil Surface Coating MACT standard. This rule has been proposed and is scheduled to be promulgated in July 2001. The purpose for this mailing was to promote pollution prevention as a means of reducing emissions.

Sustainable Industries-Metal Casting Sector Agreement

U.S. EPA has organized several groups to address industry and agency concerns related to this and other industries. DAPC staff has participated in an advisory capacity. U.S. EPA has prepared a draft agreement, Metal Casting Sector Partnership Agreement, to be signed by a number of parties, including the Ohio EPA Director. The purpose is to set goals, and says that Ohio EPA will cooperate in providing assistance to the industry, and support the development of an NSR Permitting Guide, Guidance on Beneficial Uses of Spent Foundry Sand, Environmental Assistance and a pilot program for Environmental Management Systems.

P2 Supplemental environmental projects (SEPs)

Duracote Corporation, Ravenna (Portage County) has agreed to a penalty of \$10,750 to settle violations of Ohio EPA's air pollution control regulations. In lieu of paying that amount directly to Ohio EPA, the settlement agreement allows Duracote to direct the penalty to an environmentally beneficial project to replace one of the automotive top coatings with a new coating containing less solvent. The project would lower the amount of solvent emissions from the facility by at least 9.2 tons per year beginning this year.

Division of Drinking and Ground Waters

DDAGW had no activities to report this quarter.

Division of Hazardous Waste Management

DHWM P2 Teams***DHWM P2 Training***

The Division of Hazardous Waste Management (DHWM) continues to lead the way in integrating P2 into its overall program. The DHWM P2 team is incorporating P2 in inspections, building more P2 into technical assistance, and working on training and information resources for further implementation.

The Office of Pollution Prevention (OPP) has participated in DHWM's Compliance, Enforcement and Inspection (CEI) training and provided presentations on integrating pollution prevention into inspections and pollution prevention supplemental environmental projects. DHWM is also working with OPP to provide baseline pollution prevention training to DHWM staff in July 2001. This training will be geared toward newer staff providing a foundation in pollution prevention that can be built upon in subsequent training sessions. The training will cover the basics of pollution prevention and focus on integration of DHWM's Pollution Prevention Strategy. DHWM also plans to conduct P2 Refresher Training to current inspectors and include P2 sector training in Painting and Coatings and Parts Cleaning during their annual fall conference.

Metrics

DHWM has developed specific metrics to measure P2 activities. The following are examples of P2 metrics that will be measured monthly:

B. COMPLIANCE

I. Compliance Inspections Performed (TSD's, LQG's, Other)

Type: TSD	Total
Annual Goal	
Performed this Month	
Amount of pollution prevented	
Amount of cost savings	
Performed this Quarter	
Performed YTD	

Type: LQG	Total
Annual Goal	
Performed this Month	
# of written P2 Suggestions this Month	
Performed this Quarter	
Performed YTD	

Type: Other	Total
Annual Goal	
Performed this Month	
# of written P2 Suggestions this Month	
Performed this Quarter	
Performed YTD	

F. P2 ACTIVITIES

Activity	Comments/Narrative
Miscellaneous P2 Activities	

P2 Assessments	Total	Comments
# Requested		
Number of requests resulting from the following:		
-Inspection		
-Notifier article		
-Presentation		
# Provided		
Follow up Call Results		
% of recommendations that the handler implemented resulting from P2 assessment services		
Actual amount of pollution prevented resulting from P2 assessment services		
Actual cost savings resulting from P2 assessment services		
% (and #) of generators changing status resulting from P2 assessment services (for example, going from LQG to SQG)		

P2 Supplemental environmental projects (SEPs)

Ohio EPA has reached a settlement with Grant Medical Center, Columbus, for past hazardous waste violations. The settlement includes a \$14,000 penalty; \$4,000 will go to the Ohio hazardous waste cleanup fund, and Grant will implement a pollution prevention project at the hospital worth at least \$10,000. Grant Medical Center has corrected the violations and appears to be in compliance with applicable hazardous waste regulations. The pollution prevention project consists of replacing Grant's mercury-containing sphygmomanometers (an instrument for measuring arterial blood pressure) with ones that do not contain mercury.

Division of Solid and Infectious Waste Management***Ohio Materials Exchange***

Because of state budget cuts, the Division of Solid & Infectious Waste Management (DSIWM) can no longer fund the Ohio Materials Exchange bimonthly publication. OMEx is still operational. Listings for available and wanted materials are updated bimonthly on OPP's web site www.epa.state.oh.us/opp/recyc/omex.html. OMEx is exploring other funding sources.

P2 in Rules

DSIWM has proposed P2 language in draft rules for residual (captive) landfills to address the pollution prevention efforts of the generator in order to obtain a permit.

DSIWM has also drafted proposed language in C&DD rules that encourages recycling, reduction and reuse. Hearings on landfill and C&DD rules are scheduled in August and propose to file with the Joint Committee on Agency Rule Review (JCARR) in September.

Division of Surface Water***Compliance Assistance and P2 Assessment***

A portion of a DSW pretreatment compliance assistance effort, OPP recently completed a site assessment at Ringle Plating Corporation in Celina. Ringle Plating is a job shop electroplater providing nickel-chrome and zinc electroplating services for a wide variety of industries. Pollution prevention opportunities identified during the assessment include water conservation and reducing the amount of wastewater from the nickel-chrome and the zinc plating lines. Estimated environmental benefits include annual reductions of over 2.3 million gallons of wastewater and 15,600 pounds of hazardous waste. These opportunities represent an estimated annual savings of more than \$41,000.

Storm Water Pollution Prevention

In preparing for the Storm Water Phase II Final Rule, DSW distributed the brochure “Storm Water Pollution Prevention for the Home” as part of a technical assistance and outreach effort to the districts and local municipalities affected by this rule.

Division of Environmental & Financial Assistance

DEFA had no activities to report this quarter.

Ohio Environmental Education Fund***Environmental Education Grant***

The Ohio Environmental Education Fund (OEEF) has awarded \$43,948 to the Metropolitan Ohio Hospital Associations (OHA) to produce a hospital best practice guide. The proposal provides a program structure and resources to advance pollution prevention (P2) in hospitals throughout the state, including reduction and proper management of solid, hazardous, infectious, radioactive, liquid and confidential wastes. An OHA working group will initiate a peer-to-peer training network, and working groups to reduce or eliminate mercury and persistent bio-accumulative toxins (PBTs), so that by 2002, more than 50 percent of hospitals will be participating in the Mercury Challenge Program. A set of score keeping tools will help at least 50 percent of Ohio hospitals conduct a baseline waste assessment and measure results as they implement comprehensive pollution prevention plans. The program provides two rounds of train-the-trainer workshops on mercury reduction and pollution prevention auditing for hospital administrators. It includes recognition programs; a directory of key resource personnel; a list-serve and a statewide conference-call seminar series for ongoing discussion; and a case study book on best practices in Ohio hospitals.

Operations & Facilities

Recycling office materials

During this reporting period, O&F recycled approximately 45,600 lbs. of paper or an average of 3,800 lbs. per week. They also recycled 260 lbs. of aluminum cans.

Northwest District Office

Northwest Ohio Pollution Prevention Team (NWOP2) activity

NWOP2 co-hosted the City of Toledo Annual Environmental Conference on May 21 with the City of Toledo's Division of Environmental Services and the Ohio Spill Planning, Prevention and Emergency Response Association. OPP provided presentations on P2 and the Proposed Metal Products and Machinery Wastewater Rules, Mercury and PBT P2 Activities, and the Ohio Healthy Hospital P2 Initiative.

Northeast District Office

NEDO had no activities to report this quarter.

Central District Office

CDO had no activities to report this quarter.

Southeast District Office

P2 in DHWM Inspections and Technical Assistance Activities

Facility Activity	Comments/Narrative
Globe Furniture	provided fact sheets on used oil management and recycling fluorescent bulbs
Federal Mogul	Discussed parts washing
Pollack's Auto Body	Discussed parts washing
Oberling Ford	Discussed parts washing
Linden Lighting & Supply	letter/fact sheet information sent in. re. Disposal of fluorescent bulbs and purchase of non-hazardous bulbs
Mayflower Vehicle Systems	Discussed P2 with the facility rep. They will pursue a reduction in the amount of oil generated each month (approx. 5000 gallons per month currently)
Kraton Polymers	Discussed P2 with the facility during the CEI
Wheeling Pitt - Yorkville	Discussed the use on commercially laundered shop rags
Verizon	Fluorescent light fact sheet
Kraton Polymers	Provided list of solvent alternatives
Hanson Midwest	Fluorescent light fact sheet
Knauff's Auto Repair	Fluorescent light fact sheet

Facility Activity	Comments/Narrative
Sparkel Cleaners	Provided information on fluorescent lamp recycling and encouraged them to consider a P2 Assessment
Miller Sales and Service	Provided information on used oil and fluorescent lamp recycling
The Furniture Pod	Encouraged them to find another user for product that is still useable that they no longer want, provided information on the OMEx system
Howden Buffalo	Had several conference calls with OPP and continued writing up P2 assessment.
A.E. Ruston Electric (Jackson OH)	Sent P2 information with NOC on 6/08/01
Classic Cleaners (Jackson OH)	Sent dry-cleaning and P2 information per technical assistance request

Technical Assistance	Month	QTR	YTD
# of P2 Assessments Requested	0	0	1
# of P2 Assessments Provided	0	0	1

Southwest District Office

SWDO has no activities to report this quarter.