

Pollution Prevention Integration Quarterly Report

Second Quarter (FY 02) - October through December 2001

Introduction

The Pollution Prevention Integration Quarterly Report is completed by the Office of Pollution Prevention 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 (OPP)

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

Ohio Mercury Reduction Workgroup

The Ohio Mercury Reduction Group met on October 31 and December 12 at the Lazarus Government Center. Agenda items included: a round robin discussion of mercury reduction activities occurring throughout the State; a presentation and discussion with Mark Durno, U.S. EPA emergency responder; a review of poster ideas to promote mercury awareness; a discussion of thermometer collection and outreach activities and a review of the group's progress over the past year. The group also reviewed new mercury issues, progress made by the mercury in schools and data evaluation subgroups, mercury Web page information, and a mercury awareness poster for outreach purposes.

Mass Mailing to PBT Generators

OPP completed a mass mailing to more than 800 generators of persistent, bioaccumulative and toxic (PBT) chemicals in the Lake Erie Basin of the State in October. The mailing explained U.S. EPA's focus on PBT reductions and asked generators if they were interested in taking advantage of OPP's technical assistance services to help them reduce PBT and other types of wastes. This effort was part of the RCRA Great Lakes Initiatives funded by the Division of Hazardous Waste Management.

P2 supplemental environmental projects (SEPs) reviewed

OPP reviewed and commented on the Mid Bus P2 SEP proposal for the Division of Hazardous Waste Management on October 17.

OPP reviewed and commented on the Hearn Plating P2 SEP proposal for the Division of Hazardous Waste Management on October 18.

OPP reviewed and commented on the AK Steel P2 SEP for the Division of Hazardous Waste Management on October 30.

P2 in permits, rules and compliance assistance

OPP presented and discussed possible joint P2 efforts with the Division of Drinking and Ground Water's Source Water Assessment and Protection Program staff on November 5.

Division of Air Pollution Control (DAPC)

DAPC had no activities to report this quarter.

Division of Drinking and Ground Waters (DDAGW)

Source Water Protection Program (SWAP)

OPP participated in a meeting with DDAGW staff on November 5 to review how P2 may be incorporated into the SWAP program. OPP will review some linkages between P2 and source water protection activities and review case studies of P2 efforts at some of the facilities involved in future SWAP site visits. It is anticipated that OPP staff will accompany DDAGW on SWAP site visits to help identify P2 related source water protection strategies.

Division of Hazardous Waste Management (DHWM)

DHWM P2 Training

On November 13, DHWM, in conjunction with OPP, provided sector-based pollution prevention training for approximately 37 DHWM and 3 Division of Surface Water staff. This training focused on industrial parts cleaners and alternative cleaning solvents. The purpose of the workshop was to provide field staff with a better understanding and knowledge of industrial parts cleaners and alternative cleaning solvents to improved P2/Waste Minimization assistance to Ohio companies. Two industrial parts cleaning related companies provided information and answered questions as part of the training.

P2 Assessments

Pollution prevention (P2) assessments are being conducted by DHWM staff to help Ohio facilities identify and implement P2 practices and reduce waste generation. This DHWM service is a key component of the Division's P2 strategy.

DHWM staff, with assistance from OPP, has completed five P2 assessments during 2000 and 2001. Three other P2 assessments are currently in progress for 2002. Several other potential P2 assessments are currently being discussed with interested facilities.

Conducting P2 assessments enables staff to work directly with a facility to identify specific waste minimization/P2 opportunities. Benefits from DHWM P2 assessment have included reduced waste generation and increased cost savings for participating facilities. Besides important environmental benefits for DHWM, staffs are obtaining new skills and increasing knowledge related to process-specific waste minimization/P2 activities.

Summary of Completed DHWM P2 Assessments

Company Location Number of Employees	Facility Description SIC	P2 assessment focus areas Potential opportunities
Mill's Pride Waverly 1,500	Kitchen cabinet manufacturer 2432 - Wood Kitchen Cabinets	Increase transfer efficiency on flat line finishing systems; extend cleaning solvent life; investigate reusable booth filters
Howden Buffalo New Philadelphia 200	Industrial fans, blowers manufacturer Fabrication 3564 - Blowers & Fans	Extend metalworking coolant life; optimize painting transfer efficiency; foundry sand reduction and recycling; solid waste (wood, paper, metal) reduction and recycling; non-contact cooling water reuse
MetalTek Inc. Springfield 20	Paint removal, cleaning services 3471- Electroplating, Plating, Polishing, Anodizing & Coloring	Reduce water use and wastewater generation; reduce/recycle spent phosphoric acid
Wood Graphics Cincinnati 30	Rotogravure cylinder reconditioning 2796 - Platemaking and Related Services	Evaluate solvent alternatives for toluene/methylene chloride; investigate solvent distillation to recover ethanol
Pandora Manufacturing Pandora 70	Automotive fluids, additives packaging 2899 - Chemical Preparations	Investigate off-spec product reuse; Investigate solvent distillation for purge products; Optimize practices to reduce cleaning solvent use

The estimated environmental benefits from completed P2 assessments include potential reductions of more than 253,000 pounds of hazardous waste, more than 2,025,000 gallons of wastewater and more than 180,000 pounds in volatile organic compound (VOC) emissions. Companies could save an estimated \$418,491 annually in potential cost savings.

Ohio EPA enforcement settlements finalized with P2 SEPs

Hearn Plating Co., Ltd.

Ohio EPA reached a settlement with Hearn Plating Co., Ltd. for past hazardous waste violations and issued an administrative consent order on December 14, 2001. The violations occurred at its electroplating facility located in Toledo (Lucas County). The settlement included a \$18,100 penalty of which \$5,000 will be deposited into the state's hazardous waste clean-up fund. Ohio EPA agreed to let Hearn Plating use the remaining \$13,100 for pollution prevention projects at the facility. In lieu of paying the additional \$13,100, the company will install liquid cleaners, an automatic feeding system and conductivity controllers at its facility.

J & M Manufacturing

Ohio EPA reached a settlement with J & M Manufacturing for past hazardous waste violations and issued an administrative consent order on December 20, 2001. The violations occurred at its facility located in Fort Recovery (Mercer County). The settlement includes a \$22,000 penalty of which \$15,000 will be deposited into the state's hazardous waste clean-up fund. Ohio EPA agreed to let J& M Manufacturing use the remaining \$7,000 for pollution prevention projects at the facility. In lieu of paying the additional \$7,000, the company is installing a powder coating paint system which costs at least \$132,400.

Division of Solid and Infectious Waste Management (DSIWM)

Ohio EPA Adopts Revised Solid Waste Management Plan

Governor Bob Taft declared November 15, 2001 "Ohio Recycles Day" and Ohio EPA Director Christopher Jones recognized the occasion by adopting an updated State Solid Waste Management Plan, which includes goals to increase recycling in Ohio. The plan was approved by the State Solid Waste Management Advisory Council (SWAC) and established goals for Ohio's 52 solid waste management districts. It also identified statewide strategies to increase recycling and address solid waste issues in Ohio.

Major changes in the plan include:

- increasing the recycling goal for industrial waste from 50 to 66 percent;
- adding a requirement that solid waste management districts examine the possibilities available for electronics recycling in their communities;
- requiring solid waste management districts to examine the economic incentives to participate in available recycling programs; and
- establishing a state goal of recycling 50 percent of all solid waste generated in Ohio by 2005.

SWAC consists of representatives of the public, solid waste industry, local governments and other affected parties. They reviewed the plan and made recommendations concerning needs in their areas of expertise. A public comment period was held, including five public hearings throughout the state, allowing interested people to submit comments. The purpose of the State Solid Waste Management Plan is to:

- reduce reliance on landfills for the management of solid waste;
- establish objectives for solid waste reduction and recycling;
- develop restrictions on the types of solid waste that can be landfilled;
- establish requirements for locating landfills;
- examine methods of disposal for municipal solid waste incinerator ash;
- organize a statewide strategy for managing scrap tires;
- create a strategy to promote markets for products containing recycled material; and
- design a program for the proper management of household hazardous waste.

Division of Surface Water (DSW)

Ohio EPA enforcement settlements finalized with P2 SEPs

Ohio EPA reached a \$33,000 settlement on December 13, 2001 with a Kaldor Dairy Farm (Belmont County) for past water quality violations impacting Wegee Creek and tributaries of the creek. The owner of the farm has agreed to pay a civil penalty of \$5,000 to Ohio EPA and, in lieu of additional civil penalties of \$28,000, to implement a composting operation for proper management of animal wastes at the farm.

Division of Environmental & Financial Assistance (DEFA)

DEFA had no activities to report this quarter.

Ohio Environmental Education Fund (OEEF)

OEEF had no activities to report this quarter.

Operations & Facilities (O&F)

Recycling office materials

During this reporting period (October, November and December), O&F recycled approximately 41,500 pounds of paper or an average of 3,458 pounds per week. They also collected and recycled 135 pounds of aluminum cans.

Northwest District Office (NWDO)

P2 Training

NWDO-DHWM staff attended a November 15 workshop at Wright Patterson Air Force Base (WPAFB) sponsored by the Cleveland Advanced Manufacturing Program and Aeronautical Systems Center at WPAFB called “Innovative Pollution Prevention Technologies.”

Northeast District Office (NEDO)

P2 Training

NEDO-DHWM participated in the “Advanced P2 Workshop for Metal Finishing Technical Assistance Providers” on November 28 and 29. The workshop focused on a review of field tested P2 techniques and technologies and how to identify and communicate P2 and environmental management systems opportunities to metal finishers. This U.S. EPA-sponsored training was provided to help support the National Metal Finishing Strategic Goals Program and included information on using P2 to meet regulatory requirements, conducting P2 assessments at metal finishers and reducing chrome emissions.

P2 Assessments

NEDO-DHWM conducted a P2 Assessment with OPP at Premium Service on November 15. Premium Service provides industrial laundering services in the Cleveland area. The assessment focused on wastewater and hazardous waste resulting from their cleaning operations.

NEDO-DHWM conducted a P2 Assessment with OPP at the Alcoa Cleveland Facility on December 11. The Alcoa Cleveland Facility is an aluminum products manufacturer for the aerospace, automotive and truck industries. The assessment focused on water conservation, acid etching waste reduction and wastewater pollution prevention opportunities.

Central District Office (CDO)

CDO had no activities to report this quarter.

Southwest District Office (SWDO)

Southwest Ohio Local Government P2 Collaborative

The Southwest Ohio Local Government P2 Collaborative held its quarterly training session on December 5 at TechSolve in Cincinnati. Training sessions included: “*Energy Efficiency Programs and Resources for Local Development*” led by Dr. Manny Anunike, Program Manager, Ohio Department of Development Office of Energy Efficiency; “*Energy Efficiency Improvements at the U.S. EPA Laboratories, Cincinnati*” led by Rhonda Hampton, Mechanical Engineer, Facilities Management and Services Division, U.S. EPA, Cincinnati; “*E2 = P2: Real World Experiences*,” led by Sarah Lynn Cunningham, Environmental Projects Engineer, Louisville & Jefferson County Metropolitan Sewer District and “*Increasing Energy Efficiency: Hands-on Tips*,” led by Sister Paula Gonzalez, a former Biology Professor at Mount St. Joseph College.

Southeast District Office (SEDO)

P2 in DHWM Inspections and Technical Assistance Activities

Facility Activity	Comments/Narrative
Whiteside Chevrolet	Discussed looking at other options for their parts washers
Western Branch Diesel	Discussed waste minimization
Lang Truck and Trailer	CEI/ discussed used oil heaters and recycling of spent lamps
Conley Body Shop	CEI/ discussed p2 of spent solvents
Organic Technologies	provided comments and written info
Ricart Automotive	discussed proper management of spent fluorescent bulbs
Chevron Phillips	Discussed logistics for 11/5 P2 Assessment
Airolite	Facility requested a P2 Assessment
Merillat Industries	P2 information given to company during inspection and sent with letter
Anchor Glass Container	P2 information given to company during inspection and sent with letter
AluChem	P2 information given to company during inspection/complaint investigation
AP Green Industries, Inc.	P2 information given to company during inspection and sent with letter
Centria	Web page access to P2 ideas
BP Bulk Plant Cambridge	Web page access to P2 ideas
Chevron Phillips Chemical Corp.	Conducted P2 assessment, Nov. 5, 2001
Gould Electronics	CEI, made P2 suggestions in NOV regarding alternative parts washers, reusable packaging materials, and decontamination of construction debris. Provided written info on parts washers.
Liebert Corp.	Discussed waste minimization during inspection

Facility Activity	Comments/Narrative
Kenworth	Suggested better waste segregation and P2 assessment, gave used oil fact sheet
RJF	Conference call to discuss M2P2 inspection
Brown Bros. Landfill (DSIWM facility)	Used oil, battery recycling information via letter. Company responded 11/29/01 with receipts of having their used oil, batteries recycled
Three C Body Shop	Suggested solvent recycling
Honeywell	Discussed the recycling of still bottoms in tanks at the facility
Pepsi Cola Bottling Company	Discussed solvent alternatives during CEI; recycling of used oil filters
Rushtown Auto Sales	Discussed recycling of used oil filters
Chevron Phillips Chemical Corp	Still awaiting response to questions sent to company as followup to P2 Assessment
Ohio Central Railroad	Requested P2 Assessment

Technical Assistance	2 nd Quarter	YTD
# of P2 Assessments Requested	2	4
# of P2 Assessments Provided	1	1