

NDEQ Pollution Prevention Plan

The Pollution Prevention plan is based on the premise that *“an ounce of prevention is worth a pound of cure.”*

Pollution Prevention offers promising solutions to avoid, eliminate, or reduce contamination of our air, land, and water and represents a proactive approach to environmental protection. The Nebraska Department of Environmental Quality (NDEQ) is committed to assist Nebraskans in attaining and maintaining the outstanding quality of our air, land, and water.

This plan serves as a blueprint for the NDEQ goals, strategies and processes promoting voluntary Pollution Prevention efforts. It is based on well established principles, shared experiences, and input from NDEQ staff. The Pollution Prevention plan is a dynamic document and will be modified as new lessons are learned and the needs of stakeholders are reassessed.

In order to fully implement this plan, a coordinated Department-wide effort will be needed. The implementation of the plan will not add to existing duties--it may result in a modification to those duties. Many of the activities mentioned in this plan are now being carried out by various programs within the Department. If the Department is to operate in as an effective and efficient manner as is needed, Pollution Prevention must be inherent to the conduct of all programs. This plan is intended to augment this desire.

General Elements

NDEQ's goal is to prevent pollution by eliminating or reducing, to the maximum extent possible, pollution at the source. While great efforts have been devoted to preventing pollution through reduction efforts, it is the intent of the Pollution Prevention team to eliminate waste. It is acknowledged that total elimination is not possible--nevertheless, it is important that the Department continue to make all efforts to eliminate waste. The Department will implement a threefold approach to Pollution Prevention consisting of the following general elements:

- **NDEQ Internal Pollution Prevention Programs**
- **Statewide Pollution Prevention Programs**
- **National Pollution Prevention Programs**

NDEQ Internal Pollution Prevention Programs

In order to be effective, Pollution Prevention must be inherent in all NDEQ programs. The relationship that reducing pollution in one area has on another, e.g. reducing air emissions from a process but increasing the amount of material that must be landfilled, must be realized. Therefore, a multidisciplinary multifunctional team approach is appropriate. Such an approach requires internal training, team building, and effective communication. Coordination of these activities is the responsibility of the Pollution Prevention coordinator.

The critical component of the NDEQ internal program is the Pollution Prevention team. The team will be made up of volunteers from the programs most involved with business and industry from a regulatory standpoint. The program representatives are expected to solicit ideas and thoughts from program staff and

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convey the Pollution Prevention team ideas and thoughts to the program. Additionally the Pollution Prevention coordinator will communicate with supervisors on a routine basis.

Statewide Pollution Prevention Programs

The Pollution Prevention effort will provide assistance to the regulated community with emphasis on providing: written material; on-site assistance; other technical assistance; and training. The Pollution Prevention program will seek the cooperation and contributions of as many stakeholders as possible in the preparation and review of guidance and outreach materials, the coordination of Pollution Prevention assistance, and in providing Pollution Prevention training.

National Pollution Prevention Programs

Pollution Prevention is a dynamic and evolving field. Developments with the potential to advance the cause of Pollution Prevention occur on a continuous basis at the national level. In order to track these developments and disseminate the related information in the most effective manner possible, the Pollution Prevention team and coordinator will track the development and evolution of Pollution Prevention on the national level.

Strategies and Strategic Elements

The following four strategies and their strategic elements are provided as a guideline to carry out NDEQ's approach to Pollution Prevention. Parts of each strategy will be found in all three of the general elements.

Strategy I Provide Pollution Prevention Assistance

1. Provide on-site technical assistance
2. Provide a system for accessing Pollution Prevention information
3. Publicize funding sources for pollution prevention
4. Provide stakeholder referrals to other service providers

Strategy II Coordinate and Facilitate Pollution Prevention Efforts Throughout Nebraska

1. Facilitate Pollution Prevention research and technology transfer
2. Promote the adoption of Pollution Prevention practices in all sectors of business and industry
3. Identify areas where Pollution Prevention efforts would be most beneficial
4. Facilitate the development of new partnerships and strengthen existing partnerships

Strategy III Increase Pollution Prevention Awareness Through Education and Outreach Activities

1. Promote business-to-business mentoring
2. Publicize successful Pollution Prevention case histories
3. Provide public outreach activities

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Strategy IV Integrate Pollution Prevention Into All NDEQ Activities

1. Maintain an ongoing NDEQ Pollution Prevention team to improve training and communication within the Department
2. Integrate Pollution Prevention principles into NDEQ environmental regulatory programs

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Strategy I

Provide Pollution Prevention Assistance

Strategic Elements

1. Provide on-site technical assistance
2. Provide a system for accessing Pollution Prevention information
3. Publicize funding sources for Pollution Prevention
4. Provide stakeholder referrals to other service providers

Provide On-Site Technical Assistance

Pollution Prevention assistance programs seek to achieve environmental goals by increasing the understanding of pollution problems and potential solutions to those problems. Technical assistance to businesses, communities, trade organizations, government entities, and the public can achieve changes that ensure and protect the quality of the environment.

The Department's Pollution Prevention program will provide technical assistance through:

- On-site consultations
- Facility evaluations

Provide A System For Accessing Pollution Prevention Information

The Pollution Prevention program provides information related to all phases of Pollution Prevention. Information is delivered by phone, mail, or during on-site visits.

The Department is attempting to use the internet to provide this information. Internet access, e-mail, and an agency home page will provide addresses for relevant websites around the country. The April, 1997, survey of 400 Nebraska businesses indicated approximately 40% had internet access. It is expected that access to the internet will increase dramatically in the near future. A list of Pollution Prevention websites is available at appendix 1.

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Publicize Funding Sources For Pollution Prevention

The Pollution Prevention program will develop a procedure for the dissemination of general information on the grant programs that may have Pollution Prevention components. The programs include, but are not limited to:

- State Grants
 - Waste Reduction and Recycling Grants
 - Litter Reduction and Recycling Grants
- Environmental Trust Grants
- Nebraska Department of Energy Grants
- Federal Grants
 - Waste Wise
 - Energy Star
 - Climate Wise

The Pollution Prevention program has access to a database of the federal grants available for Pollution Prevention. The database for each grant contains information indicating the proposal due date, funds available, eligibility requirements for applicants, and purpose or use of each grant. Grants are available to a variety of applicants including businesses, state agencies, universities, community colleges, non-profit organizations, small disadvantaged communities, tribes, extension programs, and farming operations. Copies of this information will be provided upon request.

The Pollution Prevention program will maintain a list of the Pollution Prevention grant projects that have been awarded throughout Nebraska. The Pollution Prevention program will update the information as the grantee provides relevant information. The Department will coordinate a semi-annual meeting of grantees for purposes of information sharing.

Provide Stakeholder Referrals To Other Service Providers

Many Nebraska organizations provide technical assistance related to Pollution Prevention. Much of this technical assistance is available at little or no cost. A list of those organizations has been compiled and is included in the Pollution Prevention-Environmental Service Providers Directory and the Directory of Environmental Consultants Engineers.¹

¹ Available from NDEQ or on-line at <http://p2ric.unomaha.edu>

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Strategy II

Coordinate and Facilitate Pollution Prevention Efforts Throughout Nebraska

Strategic Elements

1. Facilitate Pollution Prevention research and technology transfer
2. Promote the adoption of Pollution Prevention practices in all sectors of business and industry
3. Identify the Pollution Prevention potential of stakeholders
4. Facilitate the development of new partnerships and strengthen existing partnerships

Facilitate Pollution Prevention Research And Technology Transfer

The Pollution Prevention program will participate in developing research and demonstration projects in cooperation with various organizations and businesses throughout the state. These research projects may be funded through a combination of public and private sources. Examples of projects include: Pollution Prevention accounting methods, Pollution Prevention assessment procedures, and development of different types of technologies and demonstration projects.

Promote The Adoption Of Pollution Prevention Practices In All Sectors Of Business And Industry

The Pollution Prevention program will make every attempt to respond to all requests for assistance. Additionally, the Pollution Prevention team, after consulting with their respective sections, will propose initiating a specific Pollution Prevention effort at the sector of business and industry in the state where they believe efforts will be most beneficial. This effort will require research into the specific sector in order to determine available Pollution Prevention options. The Pollution Prevention team will develop a program that will assist businesses within the sector to eliminate or reduce waste at the source. The subject businesses will be asked for approval to share their case history in an attempt to build on success.

Identify Areas Where Pollution Prevention Efforts Would Be Most Beneficial

The Pollution Prevention coordinator and team will monitor existing sources of data to assist in determining where efforts may best be directed. The EPA Toxic Release Inventory, the RCRA Biennial Hazardous Waste Requests, and the Air Program Emission Inventory Data will be relied upon as primary sources of information. Additionally, programs will be consulted in an effort to identify sectors or areas where efforts will be directed. The Pollution Prevention team is seeking to identify opportunities that will result in the greatest benefit at the least cost. This will be a continuous process.

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Facilitate The Development Of New Partnerships And Strengthen Existing Partnerships

In order to deliver Pollution Prevention services in the most effective manner possible, the Department will participate in the continuation and creation of partnerships that will maximize available resources. The Department has participated in the creation of a Nebraska Pollution Prevention Roundtable whose membership consists of entities and organizations involved with the initiation and implementation of Pollution Prevention efforts. The members of the Roundtable are looking to improve and increase the activity levels of the Roundtable.

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Strategy III

Increase Pollution Prevention Awareness Through Education and Outreach Activities

Strategic Elements

1. Promote business-to-business mentoring
2. Publicize successful Pollution Prevention case histories
3. Provide public outreach activities for business and industry

Promote Business-To-Business Mentoring

A mentoring system involves businesses that are willing to share their Pollution Prevention successes with other companies. The successes may involve product elimination or substitution, process changes, or source reduction. Additionally, examples of businesses' methods for complying with regulations should be shared. The Pollution Prevention program will identify those businesses or organizations that are willing to share successes with others.

Acting as the lead facilitator, the Pollution Prevention team will attempt to bring together industry, universities and colleges, and public and private agencies to share their knowledge and effect a synergistic relationship. The Department will establish a framework for a mentoring program which will be used as a model for similar additional efforts.

Publicize Successful Pollution Prevention Case Histories

The Pollution Prevention coordinator will coordinate the dissemination of successful Pollution Prevention success stories through the Department newsletter, program publications, general news releases, and the Department website. The Pollution Prevention team will assist in this effort by providing information to the Pollution Prevention coordinator and by encouraging other Department staff to do the same.

Provide Public Outreach Activities For Business and Industry

To attain maximum exposure in the state, Pollution Prevention must be marketed to all who may benefit from the Pollution Prevention programs. Public outreach includes training, information dissemination, and education. The element has three objectives:

1. Develop stakeholder support for pollution prevention issues and policies
2. Promote the benefits of pollution prevention
3. Foster an awareness of the importance of pollution prevention

It is the intent of this element to convey the many benefits of Pollution Prevention to businesses and citizens in the state. The Pollution Prevention program will partner with cooperating local organizations, trade groups, and schools in the outreach efforts.

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Strategy IV

Integrate Pollution Prevention Efforts Into All NDEQ Activities

Pollution prevention integration within the Department increases the number of businesses that will be made aware of the benefits of Pollution Prevention. The integration will occur through Departmental outreach programs, inspections, on-site visits, and training.

Strategic Elements

1. Form an ongoing NDEQ Pollution Prevention team to develop and improve training and communication within NDEQ.
2. Integrate pollution prevention principles into NDEQ environmental regulatory programs.

Maintain An Ongoing NDEQ Pollution Prevention Team To Improve Training And Communication Within The Department

The Pollution Prevention team will serve a critical role in the finalization, implementation, and revision of the Pollution Prevention plan. The Pollution Prevention team will suggest revisions to the plan to ensure its effectiveness. The Pollution Prevention team will be comprised of volunteers from appropriate programs.

Basic Pollution Prevention training will be provided by the Pollution Prevention coordinator and team members as appropriate. This training will be taken by each new NDEQ employee. Additionally, Pollution Prevention training for specific program areas will be provided in coordination with program-specific staff as resources allow.

The basic training consists of one half-day session. The training addresses the following areas:

- What is Pollution Prevention
- Why is Pollution Prevention important
- Life cycle of products and the related Pollution Prevention implications
- How Pollution Prevention will be used in agency activities
- Case studies of Pollution Prevention programs

Customized Pollution Prevention training will be developed which fits the unique needs of individual sections or units. The training may address the following areas:

- How to incorporate Pollution Prevention into activities
- Practical application of activities pertaining to unit or section
- Develop a Pollution Prevention checklist to be used during inspections
- Additional training needs identified by the section

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Integrate Pollution Prevention Principles Into NDEQ Environmental Regulatory Programs

Permitting

The Pollution Prevention coordinator, and appropriate team members, will assess the feasibility of including Pollution Prevention requirements in the Department's various programs. Individual programs may request assistance from the Pollution Prevention coordinator/team with regard to drafting Pollution Prevention requirements to be included in facilities' permits.

Enforcement

At the request of the program or legal section, the Pollution Prevention coordinator or selected team members will review proposed enforcement settlements to determine if Pollution Prevention efforts could play a role in the settlement. There is particular potential for supplemental environmental projects to be included in enforcement case settlements.

The Pollution Prevention coordinator will provide information to appropriate staff on federal policies on Pollution Prevention in enforcement cases. This information will include updates on the EPA "Interim Policy on the Use of Pollution Prevention Conditions in Enforcement Settlements" and "Policy on the Use of Supplemental Environmental Projects in Enforcement Settlements".

Inspections

Routine inspections represent the greatest opportunity for the Department to promote Pollution Prevention. While the inspector's primary purpose in the field is to determine compliance with applicable regulations, the inspector is also in a position to convey to the owner or operator Pollution Prevention actions which could reduce the facility's impact on the environment and possibly save the facility money. The inspector often encounters situations where referrals to the Pollution Prevention coordinator are appropriate. When these referrals are made the Pollution Prevention coordinator, or a team member, will contact the source to provide assistance.

The Pollution Prevention team will work with programs in developing specific Pollution Prevention initiatives. These initiatives will allow the inspector to step out of the regulatory role into a role devoted to assistance. Such efforts could include an effort devoted to a specific sector such as auto body shops.

Assessments

At the request of facilities, Pollution Prevention assessments will be conducted to determine potential for Pollution Prevention efforts. The assessments will provide assistance on compliance issues as well as identifying Pollution Prevention opportunities. Assessments may also be conducted at the initiative of the Pollution Prevention coordinator or team. Any such assessment will be conducted only if the subject facility is in agreement with the effort. Assessments will be conducted only after communicating with programs and the legal section to determine if there are issues the assessor should be aware of.

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* May 21, 2001