

Date

Name

Company Name

Street Address

City, State Zip Code

RE: POLLUTION PREVENTION ASSESSMENT

Dear **Name**:

At your request, **Employee(s)** of the Kentucky Pollution Prevention Center (KPPC) will visit your facility on **Date** at **Time** to conduct a **Pollution Prevention Assessment**. The purpose of this assessment is to identify waste reduction opportunities at your facility to help you reduce or eliminate your waste disposal costs and reduce raw material costs.

After we complete the assessment, you will receive a pollution prevention report identifying waste reduction opportunities. We have enclosed a **Pollution Prevention Preassessment Checklist** for you to complete and return to us by mail or fax as soon as possible. The information on the checklist will assist KPPC in better understanding your facility's operations during the assessment. To assist KPPC during the assessment and in writing the report, we would like for you to have the following records available and possibly copied: site layout, process layouts, hazardous material inventory report (SARA 312 Tier Two Report), hazardous waste profiles for all wastestreams, hazardous waste annual report, utility bills, air emission permits, and water discharge permits.

KPPC will send you a customer survey form at six months and one year intervals after you receive a final written report. Please complete the form so that KPPC can receive feedback on the services provided to you.

We look forward to seeing you on **DATE** at **Time**. If there is any conflict with this date, please contact me at (502) 852-xxxx to reschedule the **Pollution Prevention Assessment**. Thank you very much for your time.

Sincerely yours,

Employee Name

Employee Title

Enclosure

The University of Louisville
Kentucky Pollution Prevention Center

POLLUTION PREVENTION ASSISTANCE PROGRAM

Room 208, Ernst Hall
University of Louisville
Louisville, KY 40292
(502) 852-0965
Fax: (502) 852-0964

WHAT TO EXPECT FROM A KPPC POLLUTION PREVENTION ASSESSMENT

The Kentucky Pollution Prevention Center (KPPC) provides businesses with direct on-site technical consultations on waste reduction. Assessments are conducted by full-time KPPC staff and by retiree assessors trained by KPPC. All the assessors have had many years of experience as engineers and/or managers in manufacturing industries, plus extensive training in pollution prevention techniques. **The service is free, nonregulatory, and totally confidential.**

To provide the assessor with a basic "feel" for the particular facility prior to his or her on-site work, we ask the business to **carefully complete the attached checklist and return a copy to the KPPC office.** Once it is received, we will call to establish a convenient time for the site visit.

Depending on plant size and complexity, a team or a person may assess a facility. A team approach is preferred since it provides a wider range of experience, knowledge, and perception of the problem. The business must at least ensure that knowledgeable personnel are made available and that they have been instructed that the KPPC assessor's questions are to be answered fully and frankly.

The pollution prevention assessment will give attention to the sources, quantities and cost to the business of **all wastes** -- hazardous and non-hazardous solid wastes, emissions to the atmosphere and wastewater discharges. The assessment will also consider business systems that may impact waste generation such as procurement procedures, inventory controls, and scheduling practices.

The specified objectives are:

- To identify the sources of all wastes generated by the facility,
- To determine, the true costs of all waste streams to economically justify P2 projects,
- To provide technical and economic information for evaluating and selecting **appropriate pollution prevention options,**
- To furnish current information on available **reuse and recycling options,** and
- To deliver a **confidential, written report** to serve as a guide for planning, establishing policies and priorities, and for implementation of pollution prevention efforts.

The assessor will want to discuss operating procedures with workers (not necessarily supervisory) in all areas -- shipping and receiving, maintenance, each manufacturing area, quality control, inventory management, purchasing, accounting, etc.

The assessor will identify products and processes used, types of hazardous materials at the facility, wastes generated, disposal/recycling methods, and regulated activities (i.e., air, sewer, underground tanks, etc.). The age of the facility and plans for upgrading may be noted. Assessors will identify raw materials storage and handling methods that may impact waste generation.

The assessor will determine the sources, types, quantities and compositions of waste streams - pollutants to the air, the water and the land - whether hazardous or not.

All manufacturing process will be observed to identify sources of waste generation. Assessors often discover overlooked waste reduction opportunities which require no investment -- such as eliminating bad batches, leaks and spills through diligent maintenance, and employee awareness programs. They will suggest possible pollution prevention measures such as improving operating procedures, avoiding cross-contamination of materials, replacing chemicals with less hazardous ones, (e.g., water-based cleaners for solvents). Some companies have reduced hazardous waste up to 98% by implementing options included in assessment reports.

Pollution Prevention Planning

The waste assessment provides the generator with information needed to develop and implement a pollution prevention plan which is now encouraged by the General Assembly for hazardous waste generators and users of Title III, Section 313 Chemicals. A KPPC assessment furnishes a nucleus around which to build a plan for a waste reduction program which identifies long-term goals and waste management needs. The assessor may also address areas of specific concern to the generator. For example, the assessment can help the generator resolve hazardous waste management problems.

The Generator's Responsibility - Commitment and Implementation

If a pollution prevention assessment is to have value to a business, the company must become committed "from the top down" to reducing wastes. The assessment report will identify the potential pollution prevention opportunities and the financial, environmental, and employee and public relations benefits. The final destination of the report should be management to encourage commitment to the opportunities identified.

To implement the plan, you must establish an in-house team to evaluate options, set priorities, and implement the selected options. The team should include management and plant personnel from manufacturing, engineering, safety and health, purchasing, inventory control, finance, and product quality control. A technically competent person with sufficient authority to do the job should select and lead the team.

POLLUTION PREVENTION PREASSESSMENT CHECKLIST

Please complete this form and make it available to KPPC prior to the formal assessment visit.

DATE: _____

Company Name: _____ SIC Code: _____
 Street Address: _____ City: _____ County: _____
 No. of Employees: _____ Days Operated/ Week: _____ No. of Shifts/Days: _____ Sq. Ft. Under Roof: _____
 Products: _____

Information provided by: _____ Title: _____

| INDICATE WHICH OF THE FOLLOWING ARE AVAILABLE AS BACKGROUND INFORMATION FOR THE POLLUTION PREVENTION ASSESSMENT | YES | NO | ?? |
|--|-----|----|----|
| Process or work flow diagrams? | | | |
| Facility/equipment layout drawings? | | | |
| An inventory of all hazardous materials used or processed in the facility? | | | |
| Material Safety Data Sheets (MSDSs) on hazardous chemicals used or processed? | | | |
| Environmental audit report? | | | |
| Hazardous waste analyses or profiles? | | | |
| Hazardous waste annual reports and shipping manifests? | | | |
| Copies of environmental permits (air emissions, wastewater discharges, etc.)? | | | |
| Raw material inventory and cost data? | | | |
| Waste treatment and disposal cost data? | | | |
| Utility cost and sewer charges records? | | | |
| GENERAL QUESTIONS FOR HAZARDOUS WASTE GENERATORS | | | |
| Indicate your EPA/KY Hazardous Waste Generator ID No: _____ | | | |
| Are you a Large Quantity Generator? (Over 2,200 lbs. (1,000 kg) hazardous waste generated in any one calendar month) | YES | NO | ?? |
| Are you a Small Quantity Generator? (From 220 to 2,200 lbs. (100 to 1,000 kg) hazardous waste generated in any one calendar month) | | | |
| Have you generated 2.2 pounds (1 kg) or more of an Acutely Hazardous Waste (one on the RCRA "P" list) in any one calendar month? | | | |
| Are you aware that by signing the Uniform Hazardous Waste Manifest, you've implied a "good faith effort" to minimize generation of hazardous wastes? | | | |
| Does the company have on file the Pollution Prevention Plan which is described in KRS 224.46-305? | | | |
| If the above plan is on file, is there an active effort to implement it and meet its goals? | | | |
| Has the company ever had a pollution prevention assessment? (This is sometimes called a "waste minimization audit".) | | | |
| Do the Transportation, Storage and Disposal Facilities (TSDFs) you use meet all RCRA requirements? | | | |
| HAZARDOUS WASTES | | | |
| Do you store hazardous waste in lagoons, ponds or surface impoundments? | YES | NO | ?? |
| Do you store chemicals or petroleum products in underground storage tanks? How many tanks? Contents? | | | |

| WASTEWATER DISCHARGES | YES | NO | ?? |
|--|------------|-----------|-----------|
| Does the facility release wastewater into surface waters under a National Pollutant Discharge Elimination System (NPDES) permit? | | | |
| Does the facility discharge process wastewater into a sewer system served by a Publicly Owned Treatment Works (POTW _s)? | | | |
| AIR EMISSIONS – STACK AND FUGITIVE DISCHARGES | YES | NO | ?? |
| Does the facility have exhaust stacks which require air pollution control permits under the National Emission Standard for Hazardous Air Pollutants (NESHAPs)? | | | |
| Does the facility use or process volatile materials such as solvents which evaporate and become so-called fugitive emissions? | | | |
| SARA TITLE III REPORTABLE DISCHARGES | YES | NO | ?? |
| Does the facility produce, use or store any substance on the Title III Extremely Hazardous Substances list? | | | |
| If yes, has the company submitted copies of MSDS or chemicals list to State and local authorities as required under Section 311? | | | |
| If there was 10,000 pounds of a reportable chemical on-site during the year, were Tier II permits submitted as required under Section 312? | | | |
| If required to do so under Section 313, has the company submitted Toxic Chemical Release Form (Form R) to the Kentucky Department of Environmental Protection? | | | |

| QUESTIONS ABOUT RECYCLING AND REUSE PRACTICES | YES | NO | ??? |
|--|------------|-----------|------------|
| Are any wastes being recycled on-site? If yes, what are they? _____ | | | |
| Are any wastes being recycled off-site? If yes, what are they? _____ | | | |
| Does the facility generate non-hazardous used oil? Sources? _____ | | | |
| Is used oil being placed into a fuel-blending program? | | | |
| Do you bale recyclable materials such as corrugated, paper, and shrink wrap? | | | |
| Does the facility practice segregation of solid wastes to enhance recycling potential? | | | |
| Are any wastes (solid or liquid) being converted on-site to energy for process or space heating? Explain _____ | | | |

NON-HAZARDOUS WASTE STREAMS

| WASTE | SOURCE | | | DISPOSITION | | | % of Total |
|--------------------|---------|-----------|-------|-------------|----------|-------|------------|
| | Process | Packaging | Other | Landfill | Recycler | Other | |
| Corrugated | | | | | | | |
| Paper | | | | | | | |
| Pallets | | | | | | | |
| Stretch Wrap | | | | | | | |
| Glass | | | | | | | |
| Metal Drums | | | | | | | |
| Fiber Drums | | | | | | | |
| Plastic Containers | | | | | | | |
| Used Oils | | | | | | | |
| Others: | | | | | | | |
| | | | | | | | |
| | | | | | | | |

WASTE CONTAINERS ON PREMISES

| LOCATION | CU. YARDS | OPEN-TOP or COMPACTOR? | PULLS PER WEEK | MONTHLY RENTAL | HAULING FEE | TIPPING FEE |
|----------|-----------|---------------------------|-------------------|-------------------|----------------|----------------|
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| | | | | | | |

YOUR QUESTIONS ABOUT THIS ASSESSMENT OR COMMENTS ON YOUR AREA(S) OF PARTICULAR INTEREST AND CONCERN: (Please use the back of this sheet if you need more space.)
