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The P2 Tools Initiative: Pollution prevention tools complement traditional regulatory compliance tools

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P2 tools and MPCA priorities

Over the past 10 years, pollution-prevention (P2) tools have been used in Minnesota Pollution Control Agency (MPCA) projects without fully knowing their ultimate impact on the agency's environmental goals.

The P2 Tools Initiative will apply MPCA and external P2 resources to the design and implementation of two to five P2 pilot projects. The initiative is coordinated by the Agency-wide Planning and Assistance Unit and is funded as part of MPCA's annual P2 Grant from the U.S. Environmental Protection Agency (EPA).

Commissioner Corrigan and the division directors identified the following priority areas for the P2 pilot projects:

- Impaired waters
Structures: Total minimum daily loads (TMDLs) and storm water
Pollutants: Phosphorus and fecal coliform bacteria;
Focus: Maintain and improve environmental conditions
- Air toxics
- Ozone attainment

Other opportunities include:

- Permitting: reducing the backlog;
- Inspection models; and
- Supplemental Environmental Projects (SEPs).

What is pollution prevention?

Strictly speaking, "pollution prevention" (P2) means to reduce the quantity or toxicity of wastes or inputs at the source (source reduction). Reusing wastes and recycling are other preventive approaches. Treatment, control and disposal of wastes are not considered preventive practices. In addition to source reduction, the EPA considers eliminating pollution through increased efficiency in the use of raw materials, energy and water, and the protection of natural resources by conservation to be pollution prevention. The strict definition of P2 was developed with point sources in mind. The P2 community has used elements of sustainability to help address non-point sources of pollution as they have become increasingly important.

Sustainability refers to a problem-solving approach that acknowledges the interconnectivity of environmental, economic and social decisions, and is used to prevent foreseeable adverse impacts from affecting the ability of future generations to meet their needs. Pollution prevention, resource and energy conservation, environmental restoration and enhancement are cornerstones of sustainability.

The **Hierarchy of Environmental Protection Tools** is illustrated on page 2.

For more information about pollution prevention and sustainability, go to <http://www.pca.state.mn.us/programs/p2-s/index.html#p2>



Potential benefits to the service delivery programs

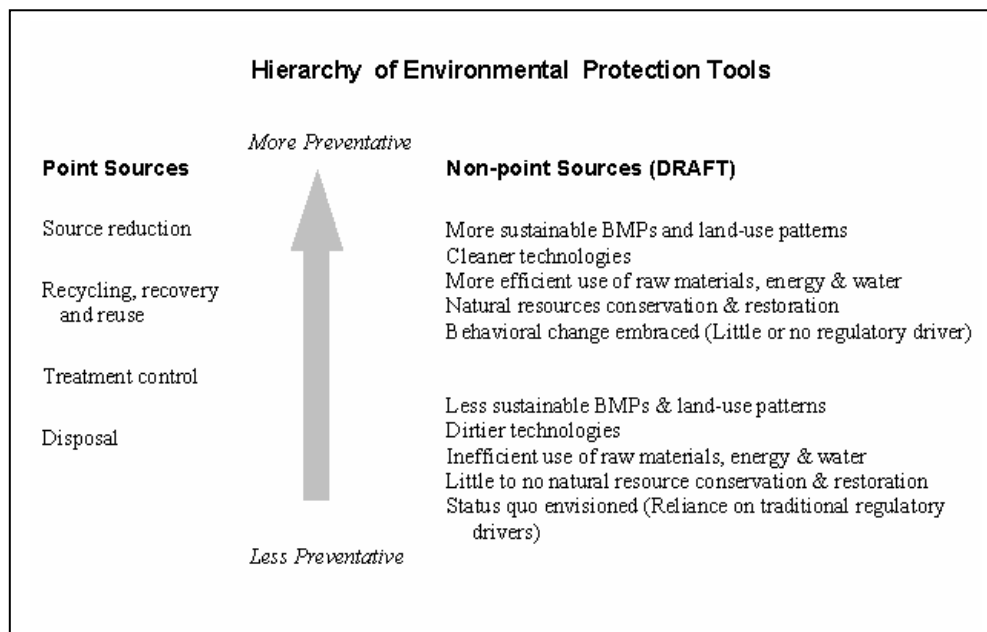
The MPCA is operating lean these days. The program staff's attention is focused on helping service delivery programs address permit backlogs and develop new programs while operating under intense public scrutiny and short timelines.

The P2 Tools Initiative is based on the notion that enhanced use of P2 tools has the potential to reduce the effort that program staff and MPCA customers devote to ensuring regulatory compliance and meeting environmental goals. P2 tools are unique in that they can protect the environment by eliminating pollution at the source, thereby reducing the level of regulatory oversight in the long term. In addition, prevention approaches have saved businesses and municipalities money.

Programs in the early stages of development or that have unfulfilled development or implementation needs present prime opportunities for MPCA planning staff to collaborate with service delivery staff and MPCA partners to combine prevention tools with more traditional environmental protection approaches. The "Phosphorus Management Plan Development Resources" sidebar on page 3 of this fact sheet describes one such P2 project.

Every year, the MPCA receives the EPA P2 Grant to promote the use of P2 tools as complements to traditional control, treatment and disposal practices. Examples of project expenses eligible for coverage under the P2 Tools Initiative include:

- Limited assistance from MPCA Office of Strategic Resource Management staff;
- Technical and business assistance from MPCA partners, such as the Minnesota Technical Assistance Program and the Office of Environmental Assistance;



- P2 training for MPCA staff;
- Design and production of P2/compliance assistance resource materials (e.g., posters, tip sheets, pollution prevention planning and other report templates, brochures and Web pages); and
- Equipment and computer software that support P2 implementation.

The Players

The P2 Tools Initiative will involve staff and leadership from across the Agency. A Project Team will oversee and guide the effort, making the final decision on which P2 projects will be implemented. The Project Team members are Kristen Applegate, Jim Warner, Rod Massey, Mike Sandusky, Roger Bjork, Cathy Moeger, Tim Scherkenbach and Art Dunn.

Managers and staff will help develop P2 project ideas and be assigned to Implementing Teams.

A Coordinating Team will coordinate and actively collaborate with service delivery staff and others to



design and implement the P2 pilot projects. This Team also coordinates all aspects of the P2 Tools Initiative. Members include Paul Schmiechen, Cindy Hilmoe, Al Innes, Andy Ronchak, Ray Bissonnette and Emily Stern. Art Dunn is the liaison between the Coordinating Team and the Project Team.

Bob Kerr and Tim Greiner, from Kerr, Greiner, Anderson & April, Inc. (KGAA), will assist the Coordinating Team to implement the P2 Tools Initiative. KGAA is known nationally for its experience in helping state environmental agencies deploy prevention tools as complements to more traditional compliance tools (for example, control, treatment and disposal) and applying relevant metrics to track project outcomes.

The Coordinating Team and KGAA presented the P2 Tools Initiative to the Managers on May 8, 2003. The purpose of the presentation was to provide an overview of the initiative, outline the potential benefits to the programs, and to acknowledge the managers

The Phosphorus Management Plan Development Resources

The Phosphorus Management Plan (PMP) Development Resources is a good example of how P2 tools can help service delivery programs. Many wastewater NPDES permits now being issued include requirements for PMPs, but staff have been aware that the Phosphorus Strategy guidelines for developing PMPs include both information and procedural gaps. Swamped with the permit backlog, the staff in the service delivery program were concerned about adequately addressing an anticipated need for increased compliance assistance for PMP development.

MPCA planning and assistance staff and the Minnesota Technical Assistance Program (MnTAP, a nonregulatory technical assistance provider, partnered with service delivery staff to develop a packet of phosphorus reduction resources (including checklists, tip sheets and fact sheets) and a template with step-by-step procedures for preparing a PMP (including how to allocate treatment plant phosphorus reduction goals to multiple industrial users). The packet emphasizes the role of prevention in phosphorus reduction. When adequately completed, the template can be submitted to fulfill the PMP requirement in the NPDES permit, thereby streamlining regulatory oversight during the PMP preparation and review process.

Expenses covered by the annual EPA P2 Grant included development and design of the resource materials, packet production costs, creation of a Web page for the resource materials, purchase of portable phosphorus monitoring equipment and a pass-through grant to the Minnesota Technical Assistance Program (MnTAP) for development assistance and for ongoing technical outreach to wastewater treatment plants and their industrial users.

The PMP Development Resources project was a win-win for the planning and assistance staff working to address EPA's mandate for more sustained use of prevention tools and for the service delivery staff faced with increased customer assistance needs and limited resources to review incoming PMPs. The importance of phosphorus reduction planning is borne out by St. Cloud, where in-plant and pretreatment practices, including prevention, were combined to realize reductions to below the 1 part per million phosphorus threshold. This limit is under consideration for the statewide phosphorus limit for wastewater treatment facilities.

The PMP Development Resource project is an example of how MPCA planning and assistance staff collaborated with service delivery staff and an MPCA partner, MnTAP, to create a compliance assistance tool that fulfilled a customer service function, streamlined regulatory oversight, and promoted pollution prevention. In addition to developing and implementing similar compliance and assistance tools, future projects that emphasize prevention approaches might involve developing or refining guidance or policy, or supporting community- or site-specific field projects aimed at reducing pollution.



and their staff for their part in the ultimate success of the initiative.

P2 Tools Initiative Timeline

The following timeline is subject to change.

Kickoff	May 2003
Identify Pilot Project Opportunities	June 2003
Screen Projects (winnow & refine)	July 2003
Final Project Selection: Project Team	July/August
Implement Projects	Fall 2003
Interim or Final Project Reports	Fall 2004

Questions or comments?

Questions and comments can be directed to:

- Art Dunn, Assistant Director, Office of Strategic Resource Management (651/215-0283, art.dunn@pca.state.mn.us),
- Paul Schmiechen, Supervisor, Agency-wide Planning and Assistance Unit (651/296-7795; paul.schmiechen@pca.state.mn.us) or
- Cindy Hilmoe, Agency-wide Planning and Assistance Unit (651/296-7783, cynthia.hilmoe@pca.state.mn.us).