



## **THE COLORADO POLLUTION PREVENTION PROGRAM**

The Pollution Prevention (P2) Program of the Colorado Department of Public Health and Environment **WORKS** with business and industry, its own internal staff, local government and the public to shift the focus of environmental-problem solving in Colorado to pollution prevention.

The P2 Program **PROVIDES** direct technical assistance to the regulated and non-regulated community, manages an incentive's-based Governor's Pollution Prevention Challenge program, directs and implements agency efforts in regulatory integration, facilitates coordination of P2 efforts in Colorado and helps to create and attract funding to new P2 initiatives in the state. The Program participates and provides leadership in local, regional and national P2 networks.

The P2 Program **OFFERS** pollution prevention information and technical assistance through free, confidential onsite assessments, industry-specific fact sheets and case studies, training programs and technical workshops, and grants for entities involved in

providing pollution prevention outreach activities and technical assistance, just to mention a few.

Excerpts from PPA for FY02 addressing P2:

Description of CDPHE and EPA Cross-cutting Themes

### 1.9.2.1 Pollution Prevention (P2)

Pollution prevention efforts are aimed at reducing the volume, toxicity and use of any hazardous substance, pollutant, or contaminant prior to recycling, treatment, or disposal. Ideally, pollution prevention activities result in a sustainable economic base which features minimal emissions and generation of wastes.

In May, 2001, CDPHE reorganized its P2 Program so as to accelerate integration of P2 expertise and P2 outreach into all of the environmental divisions. Program management has been shifted from a P2 Program Manager to existing division managers, though the P2 Program, with its staff, remains separate and distinct. The Environmental Leadership Program (ELP) will now also be organizationally part of the P2 Program. In addition, a Cross-Media Team has been created to guide P2 Program priorities, provide input into ELP activities, interface with the P2 Advisory Board, and address the increasing number of cross-media programmatic issues that arise. Each of the environmental divisions in the CDPHE have identified a senior staff person to serve on the Cross-Media Team which will meet monthly, or on an as-needed basis.

The EPA Region 8 offices have organized to better address pollution prevention by pulling together staff experts into a core program. This group will identify ways that prevention concepts and techniques can be integrated into the agency's regulatory and administrative activities.

The core P2 program provides direction for and facilitates this process of regulatory integration, but an increasing amount of the P2 work is being successfully practiced throughout the divisions. Chapter 5 includes a detailed work plan for the P2 Program and Chapters 2-4 include a description of the divisions' commitments to P2.

Since the inception of the P2 program, it has maintained a simultaneous focus on internal and external P2 activities. In addition to the intra-divisional and intra-agency planned priorities highlighted below, the P2 program will continue to emphasize the following activities focused on the greater Colorado regulated and non-regulated community:

- Quarterly networking luncheons for technical assistance and 1-2 workshops for 28 Governor's Challenge Companies
- Collaboration with Pollution Prevention Partnership on Fall and Spring Forums and P2 in Colorado Home Page
- Increasingly professional, systematic pollution prevention opportunity assessments to regulated facilities as invited by facilities or referred to by compliance staff
- Administration of \$100,000 Colorado P2 Grants Program
- Creation of Environmental Management Model for the Ski Industry
- Management of Colorado's SARA/TRI Program

## Pollution Prevention (P2)

The goal of the CDPHE is environmental protection and continuous improvement in environmental quality. Compliance achieved through a command and control regulatory infrastructure is only one component. The CDPHE is committed to making pollution prevention (P2) the state's environmental management tool of first choice as directed by the Colorado Pollution Prevention Act of 1992. Therefore, Pollution Prevention continues to be one of the overarching themes of the 2001 CEPPA. Prevention marks a significant evolution both in how the CDPHE relates to the regulated community and what services it delivers. P2 is voluntary in Colorado, and P2 solutions focus on avoiding pollution. Pollution Prevention is "any practice which reduces the volume, toxicity or use of any hazardous substance or amount of any pollutant or contaminant prior to recycling, treatment, or disposal, and reduces the hazards to the public health and the environment...", (C.R.S. 25-16.5-104). The CDPHE is committed to making these kinds of interactions occur as standard operating procedure.

During the past year, major management changes occurred that promise to give CDPHE a major boost in its efforts to implement prevention as its preferred approach to protecting the environment and interacting with the regulated community. In the summer of 1999, under the leadership of a new administration and a new Executive Director, CDPHE embarked on a strategic planning process. Participating senior management identified *prevention* as one of four critical areas of investment in the future of the agency. This direction will be linked to a new performance-based human resource management system. This is a tremendous opportunity to create a solid foundation capable of supporting prevention practices by including specific and measurable P2 references in the unit plans and individual performance goals of members of the "P2 Link" and other appropriate staff.

The CDPHE Pollution Prevention Program is responsible for designing the P2 strategy for the state as well as coordinating the P2 activities of the regulatory programs. The outreach and communications strategy to ensure that regulatory programs are aware and in alignment with this strategy will rest on P2 Program management and on the Cross-Media Team.

Regulatory Integration through full implementation of the SPRINT Project: The Cross-Media Team will complete evaluation, and coordinate any implementation, of the SPRINT regulatory integration work plan - a work plan designed with major participation of the media staff and bearing the signatures of the media division directors and the environmental director. The first half of FY2001 will see the completion of the intense work with the Boston-based Tellus Institute in setting up the seven activities of the SPRINT action plan. The seven activities include coordinated work with the ELP, coordination of the Compass Project (more on that under measurement), the creation of a facility profiling capacity, the development of a standardized P2-oriented SEP policy, and tailor made P2 projects by and for each of the media divisions. To date, the SEP Policy has been finalized and is being implemented; the Compass Project continues to move forward as explained below; and the ELP program manager position is being staffed.

Measurement through the Compass Project: Measurement of environmental outcomes as a result of pollution prevention activities is difficult but absolutely critical if prevention is ever to compete on the same playing field as the traditional command and control programs. Better measurement of our work is important not only for our own management purposes but for our external customers such as Congress and multi-national corporations as they decide between investments in the environment and all the other pressing social and economic needs for resources. Recognizing that, the P2 program stepped forward to get involved with and take a leadership role in Colorado's Compass Project -- an ambitious two-year project that will create and pilot technical and behavioral systems by which we will measure and compare the actual environmental results of all of our activities: traditional enforcement based activities to pollution prevention technical assistance and proactive compliance assistance. The Compass Project which will proceed in close step with national efforts to create meaningful environmental indicators, is just getting started as of the writing of this proposal but will be in full swing and all P2 program activities will be a part of this system during FY2001. At the end of FY2001, the status of the Compass Project pilots is as follows:

1. Asphalt Plants Compliance Pilot - All baseline site visits will have been accomplished; P2 and Compliance Assistance materials will have been completed.
2. Expanded Data Collection for certain Air Inspections – one

year of data will have been collected.

3. Chrome MACT Compliance Pilot – All baseline inspections will have been accomplished; all P2 and Compliance Assistance materials have been completed.

4. Hazardous Waste Data Collection Pilot – one year of data will have been collected.

5. Hazardous Waste Small Quantity Generator Compliance Pilot – All baseline inspections will have been accomplished; all P2 and compliance assistance materials will have been completed.

6. Public Surface Water Systems Compliance Pilot – The RFP will have been awarded and some site visits will have been accomplished.

7. Database Development – The RFP will have been awarded; project scoping will have begun.

#### Harmonizing the Regulatory Culture: A Pilot Initiative in Northeast Metro Denver:

A high priority focus for the P2 program in FY2001 will be to work to harmonize the traditional command and control enforcement-based culture with the newer P2/Compliance assistance based approach to environmental protection. The goal is to maximize environmental benefits by combining, coordinating and carefully targeting the full range compliance and beyond compliance assurance tools as appropriate.

The co-incidence of the successful completion of the FY2000 Northeast Metro Pollution Prevention Alliance P2 project and plans by the EPA to implement an enforcement initiative in a community within the NEMPPA area present us with a unique and promising opportunity. We are committed to working with the EPA and to facilitating coordination within our own agency to most effectively target our respective activities in that community. At this time, the form of the initiative must still be co-designed with the EPA. The P2 Program supports and will work towards a pilot initiative that will go well beyond co-ordination and will be designed to actually use P2 as the environmental management tool of first choice in this community for a majority of the businesses.