

Compliance with regulatory requirements, worker exposure, permitting, installing capital intensive control equipment, waste disposal, and many other factors may pose a threat to your profitability and ability to compete in the marketplace.

Pollution prevention, which reduces or eliminates waste at the source, will help you cut those costs and improve your ability to stay competitive and profitable.

Is Your Business Using Regulated Chemicals?

WATCH YOUR PROFITS EVAPORATE

Ecology Fact Sheet

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n Nov. 15, 1990, the Clean Air Act Amendments (CAAA) were signed into law. Thousands of small businesses are affected by the amendments' controls on small air pollution sources. The requirements affecting small business owners and operators depends on how badly the local air is polluted, and the kinds and quantities of pollutants their businesses emit. Auto body shops, bakeries, distilleries, dry cleaners, fiberglass fabricators, foundries, furniture manufacturers, gasoline service stations, general contractors, metal finishers and fabricators, photo finishing laboratories, printing shops, and other small businesses may be affected by the air pollution control programs the law may require. Complying with the law's requirements, however, is not the only cost that influences your bottom line.

| (| Worker Exposure | Monitori | Maintenance | |
|---|------------------|--------------------------|-----------------------|--|
| | Hazardo | Hazardous Waste Disposal | | |
| | Emergency Planni | ing | Control Equipment | |
| | Insurance | Material Sto | rage | |
| | Sampling | Operat | ing Expenses | |
| 6 | | | MACT | |
| | 5117 | | | |
| | f | | Dwindling ⁄Profits | |



Bottom Line Busters

Operating a business using raw materials that contain regulated chemicals costs money. Estimated costs of using hazardous substances and generating wastes often are inaccurate because many of the "hidden" costs are unaccounted for. On Page 2 are typical costs and activities that often are overlooked when estimating the total costs of processes that use hazardous substances and generate wastes. Also detailed is a step-by-step approach you can take to reduce or eliminate those costs through pollution prevention.

Ecology is an equal opportunity agency. If you have special accommodation needs or require this document in an alternative format, please contact Tami Dahlgren at (360) 407-6830 (voice) or (360) 407-6006 (TDD only).

HIDDEN COSTS OF USING REGULATED CHEMICALS

Receiving Area

Spill response equipment Emergency response plan

Raw Materials Storage

Storage facilities Secondary containment Right-to-know training Reporting and records Safety training Container labels

Process Area

Safety equipment

Right-to-know training Worker exposure Waste collection equipment Emission control equipment Sampling and testing Reporting and records

Solid and Hazardous Waste

Sampling and testing Containers Labels and labeling Storage areas Transportation fees Disposal fees

Air, Water Emissions Control

Permit preparation Permit fees Capital costs Operating expenses Recovered materials Inspection and monitoring Recording and reporting Sampling and testing Emergency planning Discharge fees

AN ALTERNATIVE: POLLUTION PREVENTION

The most effective way to reduce the costs of complying with requirements in the Clean Air Act Amendments and other environmental regulations is to stop using the materials that are regulated in the first place. Reducing or eliminating waste and the use of hazardous substances is called "pollution prevention." The following pollution prevention approach can help your company:

- Comply with regulations and cut your paperwork burden;
- Reduce costs by using fewer raw materials;
- Cut waste transportation and disposal costs; and
- Reduce long-term liability and insurance costs.

The Pollution Prevention Approach

Step 1: Establish a small group of people in the facility to sit down and have a waste minimization brainstorming session. To help gain the most from this session:

- Gather information on the amount of money being spent to purchase, use and dispose of the higher-volume/more-toxic raw materials used. Be sure to account for all the costs:
- **Labor** material handling, recordkeeping, labeling, manifesting, training, permitting and reporting
- **Materials** raw materials, training materials, safety materials

Equipment – cleaning/degreasing, waste treatment, air pollution control, protective equipment storage area/equipment.

Other – waste disposal, regulatory fees and fines, testing fees

- Identify problem areas. Paints, primers, thinners, cleaning solvents, adhesives, inks, stains, varnish, and reducers typically have high percentages of regulated chemicals in their makeup.
- Represent a cross-section of responsibilities in the meeting group.

Step 2: Determine from the group's input the top three air emission sources, in terms of cost and quantity emitted. For example, write down the three air emission sources that are the most expensive to manage:

- 1 . Degreasing/surface preparation
- 2 . Solvent-based painting operations

3 . Parts washing in maintenance department Then, for example, write down the three air emission sources that have the highest level of raw material use:

- 1 . Solvent-based painting operations
- 2 . Degreasing/surface preparation
- 3 . Parts washing solvent

Step 3: Focus on one of your listed items for your first pollution prevention effort. Talk to your suppliers and explain to them your interest in finding a way to eliminate the use of regulated chemicals. Ask if they supply other products that can get the job done without the added hazardous chemicals. Also, talk to your customers about changing specifications to allow the use of alternative process materials.

Step 4: As time permits, evaluate opportunities to eliminate or reduce the second- and third- ranked waste streams. Continually look at all processes at your facility, and evaluate pollution prevention opportunities to reduce and eliminate hazardous substance use.

Who to Call for Help

Through the Washington Department of Ecology's Compliance Assistance Office, non-enforcement assistance is available for small businesses with questions about air quality regulations, ways to comply, free technical assistance, and potential financing.

For more information, contact:

Bernard Brady 360-407-6803 bbra461@ecy.wa.gov http://www.wa.gov/ecology



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