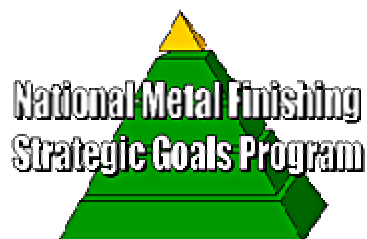


# Texas Metal Finishing Strategic Goals Program

## Program Description



Latest Revision: 8/11/00

## **Strategic Goals Program: Where did it come from?**

In 1994, the Administrator of the Environmental Protection Agency, Carol Browner, launched the Common Sense Initiative (CSI), describing it as a “fundamentally different system” to explore industry-specific strategies for environmental protection. This sector-based program was designed to promote “cleaner, cheaper, and smarter” environmental performance by using a non-adversarial, stakeholder process to test innovative ideas and approaches.

The Metal Finishing Sector Subcommittee was created, along with five other industry sectors, to address regulatory, reporting, technological, permitting, compliance and pollution prevention issues. In 1995, the Administrator challenged the Metal Finishing Subcommittee to explore a more strategic approach for taking this sector into the next generation of environmental management and regulation.

The National Metal Finishing Strategic Goals Program (SGP), designed by a multi-stakeholder group, establishes a set of voluntary national performance goals for the industry that challenge them to go beyond basic compliance with environmental regulations. The second part of the SGP sets forth a detailed action plan for all stakeholder groups, such as the Texas SGP Stakeholder Group. The goals listed below are taken directly from the Policy Package released in 1997.

- 1. Improved Resource Utilization (“Smarter”)**
  - 98% Metals Utilization (i.e. less than 2% going to landfills)\*
  - 50% Reduction in Water Use\*
  - 25% Reduction in Facility-Wide Energy Use\*
  
- 2. Reduction in Emissions and Exposures (“Cleaner”)**
  - 90% Reduction in Organic TRI emissions\*
  - 50% reduction in metals emissions to air and water\*
  - 50% reduction in land disposal of hazardous sludge and a reduction in sludge generation\*
  - Reduction in Human Exposure to toxic materials in the facility and surrounding community\*

\*Reductions are measured from 1992 (or more recent) “baseline” levels, unless significant reductions were made earlier, in which case the target level should be modified to make it meaningful yet achievable.

## **What is the Texas SGP?**

In 1998, US EPA Region 6 began working with Stakeholders to implement the SGP in Texas. The Stakeholder Group is made up of representatives of Publicly Owned Treatment Works (POTWs) or Control Authorities (CA), US EPA Region 6, Texas Natural Resource Conservation Commission, and the Texas metal finishing industry. The Texas SGP has also been actively pursuing non-governmental organization involvement.

As part of the SGP, facilities voluntarily agree to work toward achieving the seven national performance goals by 2002, the target year established by the National Metal Finishing Subcommittee. As goals are achieved by Texas facilities, they receive benefits from the regulatory community for their progress. The master copy of benefits offered by the SGP for participating industry are outlined in the Texas Performance Levels, which is Attachment 1 to this document. Due to differences in each POTW's/CA's program, each POTW/CA may offer a different set of benefits. Please inquire with your POTW/CA to get a list of specific benefits offered.

The Texas SGP Stakeholder group created a tiered system for measuring progress and awarding benefits:

- Red Level (Sign-Up),
- White Level (33% Cumulative Achievement of Goals),
- Blue Level (66% Cumulative Achievement of Goals),
- and finally Lone Star Level (100% Cumulative Achievement of Goals).

In return for moving up the Levels, benefits are received from the regulating community.

The uniqueness of the Texas SGP lies with the Texas Metal Finishing Master List and Possible Tier 4 Metal Finishing Lists. An effort to list all of the facilities in Texas has been made, resulting in a list of 1366 facilities currently operating. This list is verified and edited by participating POTWs/CAs and State and Regional regulating agencies.

Tier 4 facilities are those facilities which are chronic non-compliers, "rogue" facilities operating outside of the regulatory system, and owners of abandoned facilities. These facilities not only harm the reputation of the metal finishing industry but they avoid the costs of compliance that environmentally responsible facilities incur.

Texas SGP is committed to seeing a level playing field for metal finishers in Texas. Therefore, SGP has compiled a list of metal finishers within the state and from this list generated lists of Tier 4 facilities based on different factors that point to non-compliance. Developing this list was in direct response to concerns by metal finishing stakeholders that they are at an economic disadvantage competing with facilities operating outside the regulatory system. These lists are being used by inspectors on the State and Federal level to identify Tier 4 facilities.

## What happens when a metal finishing facility signs up?

### **Industry**

- Faxes in Statement of Commitment to SFIC (Surface Finishing Industry Council)
- Begins working on Baseline Worksheets
- If interested, signs up for TNRCC Small Business and Local Government Assistance (SB & LGA) Site Visit which is both confidential and voluntary
- Works toward meeting goals and implementation of Pollution Prevention (P2) practices
- On a yearly basis, turns in worksheets to measure progress toward goals
- Applies to Verification Committee to be moved to next Level as goals are reached
- Receives benefits as applicable based on Performance Level

### **Industry Representative**

- Contacts New SGP Participant and welcomes them to SGP
- Answers any questions the Participant may have

### **Global Environment and Technology Foundation**

- Receives notification of Sign Up and sends New SGP Participant information to EPA representatives, industry representative, AESF and NAMF (National Association of Metal Finishers) and TNRCC SB&LGA
- Upon receiving notification of New SGP Participant, begins paperwork and gets Participant entered into SGP database
- Sends out Welcome Aboard Kit to New SGP Participant upon receiving notification of facility Sign Up includes: Baseline Worksheets and Baseline Worksheet Instructions, TNRCC SB & LGA Voluntary Site Audit Information Card; Texas SGP Program Description
- Reminds members of missed Baseline/Annual Worksheets

### **NMFRC (National Metal Finishing Resource Center)**

- Upon receiving baseline worksheets, enters data for Participant into database and monitors percentage of goals achieved
- On a yearly basis, enters data from worksheets for Participant and sends out report card for participant so that they can notify Verification Committee when they have reached a new Level on the Performance Level

### **EPA**

- Notify State and POTWs/CAs when new industry signs up
- Offers benefits as listed on Performance Level worksheet as applicable for each participant and the Level they have reached

### **TNRCC**

- offers benefits as listed on Performance Level worksheet as applicable for each participant and the Level they have reached

### **POTW/Control Authority (CA)**

- Offers benefits as listed on Performance Level worksheet as applicable for each participant and the Level they have reached

### **Verification Committee**

- Reviews data for facility as necessary when notified by Participant of eligibility to move up to next Performance Level

### *What happens when a POTW/Control Authority (CA) signs up?*

#### **POTW/CA**

- Mails or faxes in Statement of Commitment sheets to National Program Manager at EPA HQ
- Reviews Welcome Aboard Kit Implementation Guidance Material for ideas of where to begin and solicit help from other participating POTWs/CAs if desired
- Look over Texas Performance Levels, select current benefits and/or add new benefits to offer SGP Industry Participants
- Hold Metal Finisher Recruitment meeting for facilities within area or contact individual metal finishers to acquaint them with SGP and encourage sign-up
- Contact participating metal finishers in area
- Review Metal Finishing Master List to edit, add, or delete metal finishers listed within their jurisdiction
- Offer benefits chosen to participating facilities as they move to new Performance Levels annually

#### **EPA HQ**

- Upon receiving Statement of Commitment, sign-up POTW/CA
- Notify EPA Region representatives of new participating POTW/CA
- Send POTW/CA Welcome Aboard Kit containing Program Description

#### **Region 6 EPA**

- Send welcome E-mail, phone or letter to new POTW/CA, offer any suggestions and give numbers of other participating POTWs/CAs who may be able to offer suggestions
- Add any additional benefits to Texas Performance Level that new participant offers

## Long Term Goals and Measures of Success

### Long Term Goals

After meeting and compiling various interests of the stakeholders in Texas, the SGP has been working to meet the needs of all interests. Some of the long term goals discussed have been:

#### EPA

1. Level Playing Field
2. Participation of All Enforcement Regulators within State
3. 100% Awareness of SGP within Texas
4. Baseline/Annual Worksheet Completion by Facilities
5. Compliance Assistance
6. Educational Outreach

#### TNRCC

1. Voluntary Compliance
2. Level Playing Field
3. Pollution Prevention
4. Compliance Assistance and Educational Outreach
5. Additional Networking Ability

#### POTWs/CAs

1. Reduce POTW/CA Workload
2. Increase Industry Compliance
3. Level Playing Field
4. Encourage Energy and Utility Conservation

#### Industry

1. 100% of Tier 4 List Inspected within 2 Years
2. 100% of SGP Participation by Industry
3. Increased SGP Awareness by EPA/TNRCC Inspectors
4. Total Regulatory Compliance of Industry
5. General Increase in Perception & Actual Environmental Stewardship
6. Regulatory Relief
7. Additional Networking Ability
8. Level Playing Field

A list of short term goals is included in this document as Attachment 2. These short term goals will be built upon as the program expands and the goals will be discussed by the Stakeholder Group and agreed upon.

### Measures of Success

#### **1. Level Playing Field for Industry**

- Increase Enforcement using Tier 4 Lists
- 50% of Facilities in Compliance at Time of or After Inspection
- Improved Profit Margin for Participants
- Encourage Tier 3 companies to Join SGP or Move to Voluntary Compliance

#### **2. Participation of All Enforcement Regulators within State**

- 100% of facilities on Tier 4 List Inspected within 2 years

**3. 100% Awareness of Program within Texas**

- Increased Sign-Up for Program (both POTW/CA and Industry sign-up)
- 90% of Participant POTW/CA Industry Recruitment Meetings Held
- TNRCC/EPA Inspectors Know Which Companies are SGP Participants Before Inspection

**4. Baseline/Annual Worksheet Completion**

- 50% Baseline/Annual Worksheets turned in by participating facilities
- 100% Completion of Baseline and Annual Worksheets

**5. Compliance Assistance and Educational Outreach**

- TNRCC Small Business and Government Assistance Initiative
- Continue assisting with Enforcement Alerts and Information Mailouts
- Workshops to Assist Shops with Compliance and Pollution Prevention

**6. Voluntary Compliance**

- Reduction in Non-Compliance and Enforcement
- Reduced Significant Non Compliance Rate, Monitoring Costs and Notice of Violations
- 50% of Facilities in Compliance at Time of or After Inspection

**7. Pollution Prevention**

- Continue Creating and Distributing Industry Specific Handouts
- Pollution Prevention Workshops

**8. Reduce POTW/CA Workload**

- Utilization of Best Management Practices by Facilities
- Reduced Enforcement Actions and Monitoring

**9. Improve Quality of Biosolids**

- Reduced Pollutant Concentrations

**10. Encourage Energy and Utility Conservation**

- Reduced Utility Bills
- Energy Audits

**11. General Increase in Perception of and Actual Environmental Stewardship**

- Good Press for Industry, No Cause for Bad Press

**12. Regulatory Relief for Industry**

- Reduced Reporting/Monitoring

**13. Additional Networking Ability**

- Quarterly Meetings of SGP
- Annual National Meeting
- Possible Technology Transfer Workshops

## Attachment 1: Texas SGP Performance Levels

Performance Level	Requirements	POTW/CA MENU OF BENEFITS **	TNRCC MENU OF BENEFITS	EPA MENU OF BENEFITS
<b>Red Level</b>	Sign Up for SGP Submit Worksheets	<ul style="list-style-type: none"> <li>● POTW Recognition (Certificate, etc.)</li> <li>● POTW Phone Reminders for Reports Due</li> <li>● Flexible Enforcement for Violations During Compliance Schedule</li> <li>● Mitigation instead of fines during compliance</li> <li>● POTW/CA involvement with multi-media inspections</li> <li>● Invitation to Annual Environmental Workshop</li> </ul>	<ul style="list-style-type: none"> <li>● P<sup>2</sup> Audit</li> <li>● SB &amp; LGA Audit Assistance &amp; Compliance Commitment Partner.</li> <li>● Call prior to scheduled inspection</li> <li>● If Category B &amp; C violations are corrected w/in 2 weeks of inspection, then no NOV issued</li> <li>● Auditors aware of SGP participation</li> </ul>	<ul style="list-style-type: none"> <li>● EPA Certificate recognizing participation</li> <li>● Welcome Aboard Kit</li> <li>● Provide Tech Assistance for completing forms</li> <li>● Reduction in frequency of reporting ongoing compliance status reports for chrome mact</li> <li>● Invitation to Annual Pretreatment Workshop</li> </ul>
<b>White Level</b>	33% Achievement Cumulative Goals (see goals below)  <i>NOTE: % Compliance Based on 1992 Baseline currently under development</i>	<ul style="list-style-type: none"> <li>● Red Level Plus</li> <li>● POTW/CA Recognition of Level by Permit</li> <li>● Reduced Monitoring for pollutants not present</li> <li>● Assistance with Technical Reports</li> <li>● Reduced Pretreatment Monitoring (surcharge, etc.)</li> <li>● Enforcement through formalized ERP Grid</li> </ul>	<ul style="list-style-type: none"> <li>● Compliance Commitment Partnership (1 year reprieve from audits)</li> <li>● SB &amp; LGA Audit Assistance</li> </ul>	<ul style="list-style-type: none"> <li>● Technical Assistance</li> <li>● Work with State &amp; POTW's to prioritize review of Pretreatment Program mods for SGP implementation</li> </ul>
<b>Blue Level</b>	66% Achievement Cumulative Goals (see goals below)  <i>NOTE: % Compliance Based on 1992 Baseline currently under development</i>	<ul style="list-style-type: none"> <li>● Red &amp; White Level Plus</li> <li>● POTW/CA Recognition of Level by Permit</li> <li>● Reduced Permit Fees</li> <li>● Notification prior to multi-media inspection</li> <li>● Optional use of POTW/CA lab services for self-monitoring</li> <li>● Tracking assistance for multi-media env. reporting</li> </ul>	<ul style="list-style-type: none"> <li>● Special consideration for Environmental Excellence Award nominations</li> <li>● P<sup>2</sup> Technical Workshop (6 month or yearly dependent upon demand)</li> <li>● SB &amp; LGA Audit Assist</li> </ul>	<ul style="list-style-type: none"> <li>● Technical Assistance</li> </ul>
<b>Lone Star Level</b> 	100% Achievement Cumulative Goals (see goals below)  <i>NOTE: % Compliance Based on 1992 Baseline currently under development</i>	<ul style="list-style-type: none"> <li>● Red, White, &amp; Blue Level Plus</li> <li>● Highest POTW/CA Authority recognizes SIU</li> <li>● Media Recognition</li> <li>● Special Lone Star Environmental Permit that covers all areas (air, water, solid waste)</li> <li>● Expedited Delisting from SIU list</li> <li>● POTW/CA conducts all compliance monitoring for SIU which includes 30 day resample for violations</li> </ul>	<ul style="list-style-type: none"> <li>● SB &amp; LGA Audit Assistance</li> </ul>	<ul style="list-style-type: none"> <li>● Technical Assistance</li> <li>● Expedited RCRA Delisting</li> <li>● Regional &amp; National EPA recognition of level</li> </ul>

**GOALS:**

- |                                   |   |   |
|-----------------------------------|---|---|
| 1. 98% metals utilized on product | 4. 90% reduction in organic TRI emissions   | 7. Reduction in human exposure to toxic materials in the facility and the surrounding community |
| 2. 50% water reduction            | 5. 50% reduction in metals emissions to air and water                                   |   |
| 3. 25% energy reduction           | 6. 50% reduction land disposal of hazardous sludge and a reduction in sludge generation |   |

\*\*Please note: Due to differences in POTW/CA programs, every POTW/CA offers different benefits. Some of the benefits listed here may not be available at your POTW/CA. Please inquire with your POTW/CA for specific benefits offered.

## Attachment 2

### Short Term Goals

In the course of Stakeholder meetings, goals for the program that are more short term are determined. Below we have attempted to capture some of the recent short term goals. For updated information, please contact Mike Tillman whose contact information is listed in Attachment 2.

<i>Goal</i>	<i>Responsible Partners</i>	<i>Completion Date</i>	<i>Measure of Success</i>
1. Dallas/Ft. Worth hold recruitment meeting	POTWs/CAs	September, 2000	
2. Compiling and Updating of Metal Finisher Database	EPA & SGP Workgroup	Continually updated as new information is added or editing of current information is conducted	Currently 1343 open facilities listed
3. Determination of Tier 4 Facilities and List Distribution to Enforcement Divisions of TNRCC & EPA	All stakeholders determined factors pointing to Tier 4 Facilities, EPA distributed lists	Completed 2/14/00, lists are continually updated and may change with new information	Completed 2/14/00
4. 10% of Tier 4 facilities inspected and/or brought into compliance	Enforcement divisions of EPA, TNRCC	December 31, 2000	Number inspected:

Attachment 3  
*Strategic Goals Program Contacts*

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