

SOUTHERN CALIFORNIA
METAL FINISHING
STRATEGIC GOALS PROGRAM

Program Description

January 14, 2000

PROGRAM OVERVIEW

A Voluntary Program Aimed at Improving Environmental Performance and Reducing Costs of Doing Business

The Southern California Metal Finishing Strategic Goals Program (SCSGP) is a voluntary, multi-stakeholder program aimed at improving environmental performance (and exceeding compliance), and reducing business and environmental costs at metal finishing facilities. At its core are a set of environmental performance goals (SGP goals) for metal finishers and a set of “enabling actions” other stakeholders will undertake to help metal finishers achieve the SGP goals (See Table 1). A detailed explanation of the goals is available at www.strategicgoals.org.

TABLE 1: Voluntary Goals for Facilities <i>Meaningful & Achievable Performance Targets</i>	
Improved Resource Utilization (“Smarter” Goals)	98% metals utilization 50% reduction in water use 25% reduction in energy use
Reduced Hazardous Emissions (“Cleaner” Goals)	90% reduction in organic TRI emissions 50% reduction in metals emissions 50% reduction in haz sludge disposal Reduction in sludge generation Reduced worker & community exposure
Increased Economic Payback & Decreased Compliance Costs (“Cheaper” Goals)	Achieve long-term economic benefits 50% reduction in unnecessary costs thru burden reduction, but not impact environmental outcomes

Metal finishing companies that participate in the Program (there is no fee), work to achieve the SGP goals, and submit annual worksheets summarizing their progress. In return, government and other participants agree to work collaboratively (no fee) with these companies; to provide technical assistance, access to capital for companies otherwise unable to get it, expedited or simplified regulatory procedures, and public recognition.

A Forum for Collaboratively Addressing Environmental Issues Relating to this Industry

Importantly, the Program also serves as a forum in which government, metal finishers, and other participants can address environmental issues relating to the industry collaboratively and constructively. It provides an opportunity to jointly prioritize environmental objectives for the industry and to develop strategies for addressing priority issues, including regulatory and technological practices.

Key Stakeholders Are Getting Involved

To date, Southern California stakeholders that have participated in the process of developing this regional SGP include federal, state, and local government agencies; metal finishers and their suppliers; environmental and community groups; and academia (See Attachment A). Each has had the opportunity to contribute to the design of the Program and will play roles in its implementation.

Serving the Interests of All Participants

The SCSGP is designed to serve the interests of all its participants — metal finishers, government agencies, and non-governmental public-interest organizations. First and foremost, all participants can benefit significantly from communicating directly and developing good working relationships with one another in this non-adversarial forum. Moreover:

Metal finishers can improve their environmental performance *and* get a competitive edge through: the development and use of environmental management systems (EMSs) tailored to the needs of metal finishing shops; new material substitution and conservation technologies and management practices. Those who may otherwise have difficulty obtaining capital for environmental equipment can do so. Participating companies within the jurisdictions of participating local air and wastewater agencies may benefit from a proposed consolidated permit application form that may reduce compliance costs.

Government agencies can learn the value of working in partnership to achieve environmental protection, and gather data to quantify benefits. They can learn about the metal finishing industry and how it can best improve environmental performance in ways that also improve its competitiveness. Agencies can identify and implement changes in reporting and permitting that will save staff time and other resources. And, agencies can share results and lessons learned so this model can be replicated in other areas and for other small business industry sectors.

Public Interest Groups can learn how metal finishing facilities can improve environmental performance cost-effectively and participate in collaborative ways of promoting positive change in the industry. They can work with metal finishers in their communities to help improve environmental performance and share success stories with the broader public.

SCSGP Benefits Aimed at Helping Participating Companies Achieve the Program Goals

The SCSGP provides benefits and numerous activities aimed at assisting participating companies to achieve the SGP goals:

TABLE 2: SGP Benefits			
Benefits	For Whom	Status	Contact
<i>Multi-stakeholder forum for addressing issues.</i> The SCSGP Steering Group — the multi-stakeholder group overseeing the program — holds open meetings quarterly at which environmental issues relating to the industry can be raised and addressed. Additional meetings may be held to address pressing issues on an <i>ad hoc</i> basis.	SCSGP participants	Ongoing	Laura Bloch, USEPA Region 9
<i>Workshops on improving a company's bottom line through achieving the Program's environmental performance goals.</i> A series of workshops for SCSGP participants focuses on how to achieve reductions in energy, water, waste, and other SGP goals in ways that will also reduce company costs.	SCSGP participants and others	Series in progress	Dan Cunningham, MFASC
<i>EMS Template and training.</i> An EMS Template designed for metal finishers is available to SCSGP participants, as are workshops on how to customize and implement an EMS.	SCSGP participants	Ongoing	Laura Bloch, USEPA Region 9
<i>On-site technical assistance.</i> REBRAC will provide environmental compliance, pollution prevention, safety and health technical assistance and training.	SCSGP participants and others	Ongoing	Bill Powers/ P.Fickenscher, REBRAC
<i>Interns.</i> Students (through an El Camino College internship program) who are familiar with the SGP goals and worksheets will be available to assist participating companies to plan and measure achievement of the SGP goals.	SCSGP participants	Avail. 1 st qtr 2000	Cynthia Holmes, REBRAC
<i>Pollution prevention technical assistance.</i> Cal /EPA will help provide P2 assistance through workshops and case studies. This will include workshops on cyanide reduction and elimination, and zero discharge case studies.	SCSGP participants and others	Avail. 2 nd qtr 2000	Pat Bennett, DTSC / Gordon Innes, SWRCB
<i>Access to Capital.</i> The SCSGP has a pilot "EnviroLoan" program. Loans of up to \$150,000 are available to participating metal finishers for purchasing pollution prevention equipment.	SCSGP participants	Ongoing	Sarah Diefendorf, EFC
<i>Consolidated permit forms.</i> An SCSGP workgroup has been developing a consolidated permit application form — which will be available to participating metal finishers — for obtaining permits from the local air quality agency and various wastewater agencies.	SCSGP participants	Forms expected 1 st qtr. 2000	Dan Cunningham, MFASC

TABLE 2 (continued): SGP Benefits

Benefits	For Whom	Status	Contact
<i>Brownfields prevention.</i> The SCSGP is developing a detailed pamphlet that explains the environmental requirements, procedures, and tools relating to selling or buying a metal finishing facility in the least expensive, most environmentally responsible manner.	SCSGP participants and others	Avail. 1 st qtr. 2000	Dion Jackson, USC CED
<i>Public recognition.</i> A company will be recognized for achieving the SGP goals. Ways to recognize companies are being explored including a letter/certificate from the Program signed by participating government agencies in recognition of superior performance.	SCSGP participants	Avail. 2 nd qtr. 2000	Jennifer Smith Grubb, Cal/EPA

PROGRAM HISTORY

The SCSGP is part of the National Metal Finishing Strategic Goals Program (SGP), which was established by participants in the Metal Finishing Sector of the USEPA Common Sense Initiative. These parties — USEPA, States, POTWs, the metal finishing industry and its suppliers, the environmental, labor, and environmental justice communities — spent three years developing the Program through a collaborative strategic planning process. The process culminated in December, 1997 when the parties unanimously endorsed and agreed to implement the Program as described in the document entitled *Metal Finishing Strategic Goals Program: National Performance Goals and Action Plan* (Available at www.strategicgoals.org).

Implementation of the National SGP is taking place at various levels. Some of the enabling actions involve consideration of changes in federal regulatory programs. These, as well as administration of a system for measuring and tracking progress towards the goals, are being implemented at the national level.

Much of the work, however, is taking place at the regional level in areas of the country where stakeholders have indicated a strong interest in developing “regional SGPs.” The SCSGP is one such regional effort. Since May, 1998, Southern California stakeholders have been meeting regularly to design and begin implementing the SCSGP.

PROGRAM GUIDING PRINCIPLES

The Southern California SGP is founded on the guiding principles and assumptions of the national Program. These include:

1. The development and implementation of the Program is to be collaborative, involving all interested stakeholders working cooperatively to identify priority environmental issues, strategies for improving environmental performance, and efficiencies in environmental regulatory programs.

2. Participation in the Program is voluntary.
3. The Program will address issues specific to each of four “tiers” of metal finishers; top-performers (Tier 1), companies that are in or near compliance (Tier 2), companies seeking to transition out of the business (Tier 3), and recalcitrant companies that do not comply with environmental laws (Tier 4).
4. Metal finishers are a critical source of information regarding what needs to be done to promote improved environmental performance within the industry.
5. Individual companies can improve their environmental performance in ways that also will improve their economic performance.

PROGRAM ADMINISTRATION AND OVERSIGHT

Administration of the Program

The Southern California SGP is designed to require minimal administration at the regional level, relying on the national infrastructure to manage sign up and worksheet submittal activities. This will free up resources in the region to promote the Program and assist participants in their efforts to achieve the SGP goals.

However, various participating organizations have taken on responsibility for aspects of regional Program implementation. The Metal Finishing Association of Southern California (MFASC) is taking a lead role promoting the Program and providing information to potential participants. To date, USEPA Region 9 has been taking the lead organizing meetings and working to assure balanced stakeholder representation.

Oversight of the Program

The multi-stakeholder group that has developed the Program will continue to provide oversight and have responsibility for defining the strategic direction of the Program. This group will meet at least quarterly for the foreseeable future. It will continue to conduct open meetings and make decisions using a consensus-based approach.

PROGRAM ELEMENTS

Southern California SGP participants are collectively designing and implementing a number of program elements; each an integral part of the overall effort to help metal finishers achieve the environmental performance and cost reduction goals of the Program. Most of these elements fall into four key areas: (1) promoting collaborative problem solving for environmental and regulatory issues relating to the industry; (2) encouraging the use of environmental management systems (EMS) and providing other technical information and assistance; (3) helping metal finishers get access to capital (loans) for pollution prevention equipment; and (4) identifying regulatory efficiencies that can save time and money for government agencies and/or metal finishers.

Each program element is described briefly below. They are organized under these four headings, along with a fifth entitled *Other Program Elements*.

Promoting Collaborative Problem Solving

Quarterly and Other Multi-Stakeholder Meetings. The multi-stakeholder group overseeing the SCSGP has charged itself with serving as a forum for raising and collaboratively addressing regionally significant environmental issues relating to this industry. This group meets quarterly and can meet at other times as needed to help resolve such issues. Sub- or work-groups are set up as needed for specific projects (e.g. the design of various program elements). *Status:* Ongoing. *Contact:* Laura Bloch, USEPA Region 9.

Phone and E-mail Lists of Government, Industry, and Other Participants. Participants have access to the phone numbers and email addresses for one another and are encouraged to raise issues with one another constructively, early and directly. *Status:* Presently available. *Contact:* Laura Bloch, USEPA Region 9.

Encouraging Environmental Management Systems (EMS), Pollution Prevention (P2), and Other Technical Assistance

EMS Template for Metal Finishers. USEPA Region 9's Merit Partnership for Pollution Prevention (Merit) developed an environmental management system (EMS) Template specifically for the metal finishing industry. Over the past year, EPA Region 9, Cal/EPA, and MFASC have been working in partnership to implement and test this Template at two metal finishing companies in southern California. Public input is provided through the SCSGP as well as Cal/EPA's Southern California Working Group. Key participants include representatives from local, state and federal government agencies, non-governmental organizations, business and academia. Data from these projects is being used to evaluate the relationship between EMS implementation and environmental performance (compliance and P2) at small and medium sized enterprises (SMEs). *Status:* The Template is available to metal finishers. *Contact:* Laura Bloch, USEPA Region 9.

EMS Workshops (Effective Use of Template). The SCSGP is putting on a series of EMS workshops. Using the Merit EMS Template, the series is designed to illustrate each phase of an EMS by reviewing concepts, tools and approaches. Through "homework" and workshop exercises, each participating facility will design and implement its own customized EMS. Through this series, Merit will help each company systematically identify, prioritize, manage, and minimize the environmental impacts of its metal finishing operations. *Status:* The training is currently ongoing. *Contact:* Laura Bloch, USEPA Region 9.

Workshops on Achieving Goals. The SCSGP is putting on a series of workshop for participating metal finishers to implement SGP. Each workshop focuses on achieving one of the SGP goals and illustrates ways of achieving it that will positively impact a company's bottom line. To date, workshops have covered the water and hazardous waste reduction goals. Other workshops will address energy use reduction and reduction of Toxic Release Inventory (TRI) emissions. *Status:* In process. *Contact:* Dan Cunningham, Metal Finishers Association of Southern California.

Pollution Prevention Technical Assistance. Cal/ EPA will sponsor workshops to address cyanide reduction and elimination, and compile zero discharge case studies. Additional pollution prevention topics for workshops are currently being reviewed. *Status:* In process.
Contact: Pat Bennett, DTSC or Gordon Innes, SWRCB.

Other Technical Assistance. Other technical assistance including consultative inspections and intern assistance is available through REBRAC. REBRAC is a non profit business outreach program and is dedicated to provide small and mid-size companies with professional and timely environmental compliance assistance; and to identify resources/referrals and up to date regulatory documents and information. *Status:* Ongoing. For technical assistance questions including consultative inspections; *Contact* Bill Powers or Perla Fickenscher, REBRAC, Yorba Linda. For questions relating to the internship program; *Contact* Cynthia Holmes, REBRAC, El Camino College.

Facilitating Access to Capital

EnviroLoan. USEPA in collaboration with the Small Business Administration (SBA), trade association representatives, POTWs and other public agencies, as well as, private for profit and non-profit organizations developed a pilot Environmental Loan Program for small metal finishers. The name of this program is EnviroLoan. The Los Angeles Area District Office of the Small Business Administration has agreed to set aside funds to guarantee loans up to \$150,000 for metal finishers who wish to obtain pollution prevention equipment in the Los Angeles area. *Status:* Operational. *Contact:* Sarah Diefendorf, EFC, Region 9.

Identifying Regulatory Efficiencies

Consolidated Local Permit Application Forms. A SCSGP workgroup is developing a consolidated local air and wastewater permit application form for participating metal finishers. It will help address the burden of filling out paperwork for various agencies which request redundant information. *Status:* Several drafts of the consolidated permit application form have been reviewed. A pilot form should be available in LA County during the first quarter of 2000. *Contact:* Dan Cunningham, MFASC, or Suzanne Wienke, LA County Sanitation Districts

Other Program Elements

Public Recognition for Industry and Companies. The SCSGP is developing a variety of means of recognizing participating companies that achieve some or all of the SGP goals. These may include: letters/certificates from the Program and signed by participating agencies to participating companies that achieve the SGP goals congratulating the company for its superior environmental performance; publication of the names of companies that are achieving the SGP goals and an annual award ceremony for companies making significant progress towards achieving all the SGP goals. *Status:* Available by 2nd quarter of 2000. *Contact:* Jennifer Smith Grubb, Cal/EPA.

“Tier 3” Guide to Selling or Buying a Metal Finishing Business This pamphlet is designed to give metal finishers the information they need to understand the environmental cost of selling or buying a metal finishing facility. It goes on to provide them with the tools to develop a roadmap to achieve their goals in the least expensive, most responsible manner. The benefits will be seen when the first metal finisher uses this pamphlet to sell his or her facility rather than leaving behind a brownfield that requires intervention by EPA and the Department of Toxic Substances Control. It will be made available to metal finishers free of charge. *Status:* Available first quarter of 2000. *Contact:* Dion Jackson, USC Center for Economic Development.

PROGRAM STEPS FOR PARTICIPATING COMPANIES

The Program is designed to be “user friendly” for participating companies. From the perspective of a company that signs up, the Program works as follows:

TABLE 3: Program Steps for Participating Companies	
Program Steps for Participating Companies	Contact (See Attachment A)
1. <i>Get General Information.</i> The first step for a company is to get and review information regarding the Program and how to participate. It is available to participating companies, companies considering participation, and anyone else interested in the Program, from the Metal Finishing Association of Southern California (MFASC) or on the web at “www.strategicgoals.org.” The MFASC can also answer any questions.	www.strategicgoals.org (Bob McDowell)
2. <i>Compile and Submit Baseline Performance Information.</i> Upon signing up, a company is asked to submit a baseline worksheet to the National Metal Finishing Resource Center (NMFRC) that identifies its “starting point” with respect to each SGP goal. Assistance in compiling this information is available through NMFRC, and the Program’s intern and technical assistance activities.	www.NMFRC.org (George Cushnie)
3. <i>Develop Plan for Achieving Goals.</i> Participating companies are encouraged to develop a plan for achieving each of the SGP goals. This plan can be incorporated in a facility EMS. Assistance in developing such a plan for a facility is available through the Program’s technical assistance and EMS Template / training activities.	Laura Bloch, USEPA Region 9

TABLE 3 (continued): Program Steps for Participating Companies

Program Steps for Participating Companies	Contact (See Attachment A)
<p>4. <i>Work to Achieve Goals.</i> Continual progress towards the SGP goals should be an objective of each participating company. The Program’s technical assistance and EnviroLoan activities may be helpful to some facilities.</p>	<p>Bill Powers / Perla Fickensscher, REBRAC</p> <p>Sarah Diefendorf, Region 9 EFC</p>
<p>5. <i>Compile and Submit Annual Performance Information.</i> The Program requires annual “progress reports” in the form of worksheets submitted to NMFRC showing where a facility stands on each SGP goal. This can then be compared to the baseline worksheet. Assistance with the worksheets is available through the NMFRC, SGP sponsored workshops, and the Program’s intern and technical assistance programs.</p>	<p>www.NMFRC.org (George Cushnie)</p>
<p>6. <i>Participate in/Benefit from Program Activities.</i> As a company participates in the Program and makes progress towards achieving the SGP goals, it can participate in the various Program activities such as the multi-stakeholder forum and any of its subgroups focusing on specific issues. It can benefit from other Program activities such as the consolidated local permit application form. For details, see Table 2: SGP Benefits.</p>	<p>Laura Bloch, USEPA Region 9</p>
<p>7. <i>Receive Recognition for Achieving SGP Goals.</i> As a participating company makes significant progress towards achieving the SGP goals, it can benefit from the Program’s public recognition mechanisms. Metal finishers that have participated in the development of the Program believe these mechanisms can be instrumental in helping to form positive perceptions of metal finishing facilities among the public and among regulators.</p>	<p>Jennifer Smith Grubb, Cal/EPA</p>

PROGRAM PLAN AND MILESTONES

The multi-stakeholder group that has designed and is overseeing the Southern California SGP will continually assess the extent to which the Program is achieving its objectives of growing the number of participating companies and helping them make substantial progress towards the SGP goals. Program elements will be evaluated on this basis, as will any proposed additional elements.

The group will pay particularly close attention to whether the current approach to incentives and rewards for progress towards the SGP goals by participating companies is effective. The SCSGP is currently collecting data to quantify the economic advantages of achieving the SGP goals. The oversight group is committed to evaluating this on an ongoing basis and making changes as needed to make the Program a success.

Specific milestones the oversight group has established include:

1. An increase of at least 50% in the number of participating companies in 2000.
2. All participating companies submitting their worksheets annually.
3. SCSGP participants submitting a brief description of their contributions to the Program.
4. An annual report from the Program showing progress on the part of participating stakeholders towards achieving the SGP goals.

At the same time, the group recognizes that both the Program as a whole and its various elements are dynamic and stakeholder driven (as is the oversight group itself); it will evolve in the direction deemed best by those involved at any given time. Furthermore, USEPA Region 9 and other stakeholders within the region are considering expanding the Program to other areas, including northern California and Arizona.

**ATTACHMENT A*:
Southern California Strategic Goals Program (SCSGP) Stakeholder Groups**

Organization	Contact Information
Barrio Planners	Frank Villalobos 323-726-7734 bpidesign@aol.com
California Environmental Protection Agency (Cal/EPA)	Jennifer Smith Grubb 510-540-3315 smithjen@ix.netcom.com
City of Los Angeles	Lonni Ayers 213-847-0802 lwayers@groupwise.san.ci.la.ca.gov
Department of Toxic Substances Control (DTSC)	Pat Bennett 916-322-4233 pbennett@dtsc.ca.gov
El Camino College	Cynthia Holmes 310-548-9363 cwholm@gateway.net
Environmental Finance Center (EFC), Region 9	Sarah Diefendorf 415-664-4715 sdief@aol.com
Los Angeles County Sanitation Districts	Suzanne Wienke 562-699-7411 (ext. 2921) swienke@lacsdsd.org
Metal Finishing Association of Southern California (MFASC)	Daniel Cunningham 818-986-8393 mfaschq@ix.netcom.com
National Metal Finishing Resource Center (NMFRC)	George Cushnie 703-264-0039 geoc@nmfrc.org
Orange County Sanitation Districts	Adriana Renescu 714-593-7435 arenescu@ocsd.com
Regional Environmental Business Resource Assistance Center (REBRAC)	Perla Fickenscher 714-695-1501 (ext. 224) perlafi@yahoo.com

ATTACHMENT A (continued):
Southern California Strategic Goals Program (SCSGP) Stakeholder Groups

Organization	Contact Information
South Coast Air Quality Management District (SCAQMD)	Ed Muehlbacher 909-396-2703 emuehlbacher@aqmd.gov
State Water Resources Control Board (SWRCB)	Gordon Innes 916-657-1042 inneg@dwq.swrcb.ca.gov
Surface Finishing Industry Council (SFIC)	Bob McDowell 716-425-7500 mcdowel@rochester.infi.net
United States Environmental Protection Agency (USEPA), Region 9	Laura Bloch 415-744-2279 bloch.laura@epa.gov
USC Center for Economic Development	Dion Jackson 213-740-6868 djackso@bus.usc.edu

* See Attachment B for a complete list of SCSGP stakeholders.

ATTACHMENT B:
Southern California Strategic Goals Program (SCSGP) Stakeholders

Lonni Ayers	City of Los Angeles
Pat Bennett	Department of Toxic Substances Control (DTSC)
Laura Bloch	United States Environmental Protection Agency, Region 9 (USEPA)
Sherril Bond	City of Los Angeles, Industrial Waste Management
Larry Bowen	South Coast Air Quality Management District (SCAQMD)
Shiela Brice	City of Los Angeles
Dan Cunningham	Metal Finishing Association of Southern California (MFASC)
Sayuri Desai	American Electroplaters & Surface Finishers Society, LA Branch (AESF)
Sarah Diefendorf	Region 9 Environmental Finance Center (EFC)
Nellie Espiritu	Regional Environmental Business Resource Assistance Center (REBRAC)
Perla Fickenscher	REBRAC
Jennifer Smith Grubb	California Environmental Protection Agency (Cal/EPA)
Cynthia Holm	El Camino College
Gordon Innes	State Water Resources Control Board (SWRCB)
Dion Jackson	USC Center for Economic Development
John Lingelbach	Facilitator
Carol McCracken	MFASC
Bob McBride	MFASC
Ed Muehlbacher	SCAQMD
Bill Powers	REBRAC
Adrianna Renescu	Orange County Sanitation Districts
Carl Sjoberg	Los Angeles County Department of Public Works
Rindy Smith	MFASC
Randy Solganik	MFASC
Mary Lou Trevis	Mothers of East Los Angeles
Frank Villalobos	Barrio Planners, Inc.
Suzanne Wienke	Los Angeles County Sanitation Districts