

Appendix A

SGP Goals

50% Water Reduction

This goal is met when a facility has an annual water usage that is 50% or less of its baseline water usage, adjusted for any changes in the facility's level of production. Companies with zero discharge for the current year automatically achieve this goal.

Companies may select to base progress on either the volume of water purchased or volume of metal finishing process wastewater discharged. Water purchased is a more accurate measurement because it is easily tracked using water bills and/or totaling water meters. However, many companies have a significant disparity between volume purchased and volume of process wastewater discharged. This is due to evaporative losses plus non-metal finishing process uses of water such as lavatories, cooling, and the presence of non-metal finishing industrial processes. In these cases, companies may submit calculated values for discharges based on total water purchased and subtracting out non-process water uses. In any event, the same methodology should be used for completing the baseline and current year worksheets. The company should retain supporting records or calculations.

25% Energy Reduction

This goal is achieved when a facility's total annual energy consumption is 25% less than its baseline total energy consumption. Captive metal finishing facilities may choose to track progress on the 25% reduction in energy use goal on a facility-wide basis or just for the metal finishing portion of their plant.

Progress on the 25% energy reduction goal is based on all sources of energy purchased by the facility, including electricity, natural gas, fuel oil, and propane. A reduction of each energy source is not necessary to achieve this goal. To calculate progress, the value of each energy source is converted to BTUs and summed. The goal is met if the sum of BTUs for the current year are 25% or less than the baseline year.

50% Reduction in Land Disposal of Hazardous Sludges and an Overall Reduction in Sludge Generation

This goal is achieved when a facility reduces its baseline annual quantity of hazardous wastewater treatment sludge (F006, F019) that is disposed of in landfills by 50% or more and achieves an overall reduction in the quantity of wastewater treatment sludge generated. Companies with zero wastewater sludge generation for the current year automatically achieve this goal.

Companies may achieve the 50% reduction goal by decreasing the quantity of sludge shipped to landfills, recycling sludge off-site, and/or de-listing their

sludge. Sludge quantity is calculated on a dry weight basis.

50% Reduction in Metals Emissions to Water and Air

This goal is achieved when the sum of annual emissions of TRI metals and cyanide to air and water from a facility are reduced by 50% from the baseline year quantity. Companies with zero emissions for the current year automatically achieve this goal.

To achieve this goal it is not necessary to reduce emissions for each individual metal or cyanide. The comparison of baseline and current year data is based on the sum of all TRI metals plus cyanide.

98% Metals Utilization

This goal can be achieved in one of two ways: (1) a facility is land-disposing 2% or less of TRI metals used or (2) a facility reduces their overall wastewater treatment sludge generated by 50% or more from their baseline year quantity.

The optional sludge reduction measurement was recently implemented because many companies operate processes that do not lend themselves to the utilization calculation. For example, processes such as etching and electropolishing remove metal from the parts, which makes tracking utilization difficult or impossible. Companies are free to select either method of tracking progress toward the 98% utilization goal.

The “land-disposing of 2% or less” method does not require baseline data; the calculation is based on current year data only. The following rules help to define this goal:

- Land disposing includes discharging to a POTW and disposing of metals in landfills (includes disposal of hazardous or non-hazardous sludges, spent solutions, and other forms of wastes).
- Metals recycled off-site are considered as utilized.
- “Metals used” are defined as the quantity of TRI metal used for finishing purposes (i.e., added to a tank as anodes or chemical compounds). It does not include the base metal (i.e., part being plated).
- Cyanide is not considered in the utilization calculation; only TRI metals are considered.
- When chemical compounds are used, the quantity is expressed as “metal.” For example 100 lbs. of chromic acid flakes (CrO₃) contains 52 lbs. of chromium as metal.
- 98% utilization of each TRI metal is not necessary to achieve this

goal. The weights of all TRI metals are summed during the utilization calculation.

The overall 50% sludge reduction method is based on a comparison of baseline and current year data. Sludge quantity is determined on a dry weight basis. Companies with zero sludge generation for the current year automatically achieve this goal.

90% Reduction in Organic TRI Emissions

This goal is achieved when sum of the annual emissions of TRI organic compounds to air and water from a facility are reduced by 90% from the baseline year quantity. Companies with zero emissions for the current year automatically achieve this goal.

It is not necessary to achieve 90% reduction for each TRI organic compound used. The weights of all TRI organics are summed during the utilization calculation.

Reduction in Human Exposure to Toxic Materials in the Facility and the Surrounding Community

This goal is achieved when a company has performed or updated all actions identified in the "reduction in human exposure to toxic chemicals" section of the worksheet in the reporting year. Note that this goal does not compare the baseline and current year activities. If a particular action is not applicable (e.g., solvent tanks are covered when not in use") it is counted as achieved.

Appendix B

SGP Goal Calculation

CALCULATING FACILITY PERFORMANCE

Example 1:

Facility X used 10,000,000 Kilowatt Hours (kwh) in their baseline year. The National Goal implies that once normalized, energy usage must be 7,500,000. In 1999, Facility X reports normalized energy use of 8,000,000 kwh – a 20% reduction and 80% of the achievement of the goal.

Facility X gets credit for 80% along this criterion.

Example 2:

Placement on the ladder is based on an average achievement rate. Facilities “score” their progress as indicated above. They then add and average their performance across the seven goals.

Goal	Score
98% metals utilized on products	10.0%
50% reduction in water use	45.0%
25% reduction in energy use.	80.0%
90% reduction in organic Toxic Release Inventory emissions;	20.0%
50% reduction in metals emissions to air and water;	0.0%
50% reduction in land disposal of hazardous sludge and a reduction in sludge generation;	10.0%
Reduction in human exposure to toxic materials in the facility and the surrounding community	75.0%
Average and “Placement Score”	30.0%

Appendix C

Statement of Commitment Form



Statement of Commitment As a Participating Company National Metal Finishing Strategic Goals Program



The National Strategic Goals Program is the result of a unique cooperative effort between representatives of the U.S. Environmental Protection Agency, the National Association of Metal Finishers (NAMF), the American Electroplaters and Surface Finishers Society (AESF), the Metal Finishing Suppliers Association (MFSA), state and local governments, and environmental and other non-governmental organizations. The Program is designed to promote cleaner, cheaper, and smarter environmental protection by the metal finishing industry.



Company Name

is proud to be a participant in the Strategic Goals Program.



Our company is willing to make a good faith effort toward achieving the National Performance Goals. We understand that the Strategic Goals Program (SGP) is voluntary, and that we have the option to exit the Program at any time, with no penalties or unfavorable consequences.



Our designated company SGP contact is:



Please Print Name Title

Phone Fax

E-mail Address

Company Address

City State Zip



If applicable, please print name of POTW/Control Authority discharging to:

Please return this completed form to:
Pollution Prevention Services
Attn: Jeff Fiagle
Wallace State Office Building
502 E. 9th St.
Des Moines, IA 50319

Appendix D

ISGP Worksheet

Iowa Metal Finishing Strategic Goals Program Progress Worksheet



Welcome to the Iowa Strategic Goals Program (SGP)! By participating in this program, you have made a voluntary commitment to pursue a set of performance goals that will contribute to a cleaner environment.

Your prompt completion of this two-page worksheet will help the industry track your progress toward the seven SGP goals.

- 1. Use this form to submit your annual data and to make any corrections or additions to previously submitted data. COMPLETE THE FORM USING YOUR AVAILABLE DATA ON FILE. YOU DO NOT NEED TO GENERATE NEW DATA.**
- 2. If you are a new SGP participant, you have the option of using any year between five years ago to the present as your baseline year. Please use this form to submit your current data and baseline data (if you select an earlier year as your baseline). (Note: Complete baseline data column **ONLY** IF this is your first worksheet submission or you are correcting previously submitted baseline data)**
- 3. In order to preserve your confidentiality, each worksheet received by the NMFRC is stripped of its contact and company information. Your facility is given a unique ID number before data are publicly displayed. IF YOU STILL HAVE PROPRIETARY CONCERNS ABOUT THE ANONYMOUS DISPLAY OF YOUR FACILITY'S PROGRESS, MARK YOUR WORKSHEET "CONFIDENTIAL." If marked "confidential," your data will only be use to compile aggregate industry results.**
- 4. Progress reports are mailed to SGP participants each year. Use your company database number (DBN) to check your progress report anytime at www.strategicgoals.org.**
- 5. If you have any questions concerning this form, contact George Cushnie at 703-264-0039 or send email to geoc@nmfrc.org.**
- 6. Please return your completed worksheet to:**

**Attn: Jeff Fiagle
Pollution Prevention Services
Wallace State Office Building
502 E. 9th St.
Des Moines, IA 50319**

DBN: _____

I. Contact and Company Information

Your Name:		e-mail:	
Company Name:		Phone:	
Company Address:		Fax:	
City, State Zip:			
Type of Facility	<input type="checkbox"/> Job Shop <input type="checkbox"/> Captive Shop		

II. Accounting for Changes in Production

Please provide data for each relevant production factor that you would like to track. Be certain to provide both baseline and current year data, otherwise progress toward meeting the Goals cannot be calculated.

Normalizing Factor	Baseline Year: _____	Year:
Metal finishing sales:	\$	\$
Number of labor hours for people working in the metal finishing shop:	hrs.	hrs.
Other*:	Type: _____ Units: _____ Value: _____	Type: _____ Units: _____ Value: _____

*If you do not track any of the above factors, select an alternative factor (e.g., pounds of product processed, amp hours, 313 Production Index) and enter type, units, and value.

III. Water and Wastewater

	Baseline Year: _____	Year:
Does your facility discharge any metal finishing process wastewater? If no, go to Part IV.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Volume of raw water purchased:	gal.	gal.
Volume of metal finishing process wastewater discharged:	gal.	gal.
Average concentration of metals in wastewater for year indicated:		
Cadmium	mg/l	mg/l
Chromium	mg/l	mg/l
Copper	mg/l	mg/l
Cyanide	mg/l	mg/l
Lead	mg/l	mg/l
Nickel	mg/l	mg/l
Silver	mg/l	mg/l
Zinc	mg/l	mg/l

IV. Wastewater Treatment Sludge

	Baseline Year: _____	Year:
Total amount of wastewater treatment sludge generated:	lbs.	lbs.
Total amount of hazardous wastewater treatment sludge that is shipped off-site for land disposal:	lbs.	lbs.
Total amount of wastewater treatment sludge that is shipped off-site for recycle/recovery:	lbs.	lbs.
Average water content of wastewater treatment sludge:	%	%
Sludge dewatering technology used (filter press, sludge dryer, etc.):		

V. Inorganic Emissions to Air

If your facility does not monitor air emissions of metals or cyanide, or cannot accurately estimate air emissions then go to Part VI.

	Baseline Year:	Year:
Quantity of metals and cyanide in air emissions for year indicated:	lbs.	lbs.

VI. Organic Chemical Emissions to Air and Water

Examples: trichloroethylene (TCE), toluene, and methyl ethyl ketone (MEK).

	Baseline Year:	Year:
Quantity of organic air and water emissions for year indicated:	lbs.	lbs.

VII. Energy Use

Energy Source	Baseline Year:	Year:
Electricity use:	kWh	kWh
Natural gas use:	therms	therms
Fuel oil/propane use:	gals.	gals.

Above energy use data covers (check one): () metal finishing operations only or () entire facility.

VIII. Reduction in Human Exposure to Toxic Materials

During your reporting year:

a written program was in place to train new workers on workplace exposures and hazards.	() Yes	
	() No	
your contingency/emergency response plans were reviewed, updated, and communicated to the Local Emergency Planning Committee (LEPC).	() Yes	
	() No	
you established a system where all employees can generate, propose, and implement pollution prevention ideas	() Yes	
	() No	
you investigated opportunities to substitute hazardous chemicals with non-hazardous or less hazardous chemicals	() Yes	() No

IX. Resource Utilization & Compliance-Related Unit Costs

The following information is used to calculate environmental-related costs for your facility. The SGP will send you an environmental and cost report.

<p>During your reporting year, how much did you pay for -</p> <ul style="list-style-type: none"> • one thousand gallons of water: _____ \$/1000 gal. (include water and sewer charges) • one unit of electricity: _____ \$/kWh. • one unit of natural gas: _____ \$/therms. • one unit of fuel oil/propane: _____ \$/gal. • one pound of sludge sent to a landfill or for recycle: _____ \$/lb. (include transportation, disposal/recycle)
<p>During your reporting year, how much did you pay for laboratory analysis of wastewater and sludge samples: _____ \$/year</p>

I certify this document was prepared under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

Signed _____ Date _____
 Title _____

Appendix E

ISGP Listserver

ISGP Listserver Information

The ISGP listserver is being provided to you as a discussion forum for all persons participating in the ISGP. Discussions on this listserver focus on issues of interest to the metal finishing community in Iowa. This listserver is also used to post announcements of breaking news and upcoming events, such as workshops, regulatory guidance, new publications, and awards.

You may automatically subscribe or unsubscribe by sending an email to any of the following addresses. Note that you can leave blank both the subject line and the body of the message:

Subscribing	Unsubscribing
<u>join-iowasgp@p2ric.org</u> <u>iowasgp-join@p2ric.org</u> <u>subscribe-iowasgp@p2ric.org</u>	<u>iowasgp-leave@p2ric.org</u> <u>leave-iowasgp@p2ric.org</u> <u>unsubscribe-iowasgp@p2ric.org</u>

You may post a message for all subscribers to read by sending the e-mail to iowasgp@p2ric.org.

Appendix F

EMS Definition

An Environmental Management System (EMS) is a framework that helps a company achieve its environmental goals through consistent management of its operations. The assumption is that consistent management will improve the environmental performance of the company. The EMS itself does not dictate a level of environmental performance that must be achieved; each company's EMS is tailored to the company's business and goals.

In the planning stage, an EMS encourages a company to continuously improve its environmental performance. The system follows a "plan-do-check-act" cycle. The company evaluates its activities to determine positive and negative environmental impacts, rank the most significant impacts, set objectives and targets, and establish programs. The company also establishes policy in line with the company's values and significant impacts. The next step is implementation. After that, the company evaluates its environmental performance to see whether the objectives and targets are being met. If targets are not being met, corrective action is taken. The results of this evaluation are then reviewed by top management to see if the EMS is working. Management revisits the environmental policy and sets new targets in a revised plan. The company then implements the revised plan. The cycle repeats, and continuous improvement occurs.

The most commonly used framework for an EMS is the one developed by the International Organization for Standardization (ISO) for the ISO 14001 standard. Established in 1996, this framework is the official international standard for an EMS.

The four main stages of an EMS, as defined by the ISO 14001 standard, are described below:

- 1. Planning - A company first identifies environmental aspects of its operations. Environmental aspects are those items, such as air pollutants or hazardous waste, that can have negative impacts on people and/or the environment. A company then determines which aspects are significant by choosing criteria considered most important by the company.**

For example, a company may choose severity, frequency, environmental compliance, and cost as its criteria to determine the most significant impacts. Once significant environmental impacts are determined, a company sets objectives and targets in order to remove or reduce those impacts. An objective is an overall environmental goal (e.g., minimize use of chemical X). A target is a detailed, quantified requirement that arises from the objectives (e.g., reduce use of chemical X by 25% by September 1998). Environmental programs are established which detail how the objectives and targets will be met. This includes designating

responsibilities, establishing a schedule, and outlining clearly defined steps to meet the targets.

- 2. Implementation (do) - A company follows through with the action plan using the necessary resources (human, financial, etc.). An important component is employee training and awareness for all employees. Other steps in the implementation stage include documentation, following operating procedures, and setting up internal and external communication lines.**

- 3. Evaluation (check) - A company monitors its operations to evaluate whether targets are being met. If not, the company takes corrective action.**

- 4. Review (act) - Top management reviews the results of the evaluation to see if the EMS is working. The plan is then revised to optimize the effectiveness of the EMS. The review stage creates a loop of continuous improvement for a company.**

Appendix G

ISGP Factsheet

Did You Know...

The National Strategic Goals Program for Metal Finishers (SGP) is an innovative, voluntary partnership between the metal finishing industry, government and communities? Efforts are currently underway to bring the SGP to Iowa.



A number of metal finishers around the U.S. have documented successful efforts to reduce waste, conserve resources and save money. The following are examples of real companies experiencing real results through the SGP.



Reduced Water Use

California Technical Plating installed longer workpiece drainage, spray rinses over the electroless nickel tanks and used flow restrictors to save water. Water usage dropped 50%, from 2.7 million gallons to 1.02 million gallons annually, with water treatment dollar savings of 20%.

In 1986, the Electro-Platers of York ran one shift on 10 production lines and used 12.88 million gallons of water. In 1999, they ran 24 hours a day on 14 production lines and used 8.6 million gallons of water.



They achieved this by using new spray rinsing technology, low-pressure air agitation in their tanks and flow restricters.

Imagineering Enterprises decreased water usage by 25%, even though production more than doubled since 1992. The reduction was accomplished by extending bath life through close monitoring of bath status; installation of flow meters on some rinses; using still rinses where possible; and recycling some processing baths.



Reduced Energy Use

All the lighting at Howard Plating Industries was replaced with new energy efficient products and a large number of 110 volt engines were eliminated, reducing lighting, costs 20%.

Lincoln Plating insulated hot plating tanks, and used floating polypropylene balls on top of tanks to retard heat loss and water evaporation. The use of insulation and just turning the tank off when not in use has resulted in savings of 45% in energy and gas bills.

SWD reduced energy usage 12.4%. These savings were accomplished by purchasing a new energy efficient, 125 HP water-cooled air compressors, which preheats process waters. By using this preheated process water and insulating steam lines and tanks, gas usage was reduced by 16.2%.



Reduced Sludge Generation

California Technical Plating reduced the production of metal hydroxide sludge by nearly 50%, from 60 tons to 34 tons annually, by using caustic soda instead of lime as a precipitator.

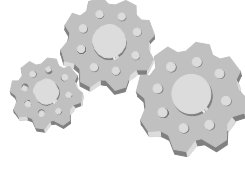
K&L installed a filter press to dewater sludge, resulting in a reduction of 40% in the water content of sludge. The cost to remove the sludge is now \$175 per ton instead of forty cents per gallon.

Lincoln Plating has reduced the sludge they previously sent to landfill by 90%, by using a sludge drier and by sending the sludge to a metal reclamation site.



Increased Metals Utilization

Best Access Systems implemented a Nickel Recovery System to reuse nickel-plating solutions lost to drag out and tank over filling, reducing the sludge's nickel content by 85% while their production usage of nickel doubled. Unique to the recovery system is a process where nickel rinse water is pumped to a separate holding container, heated and evaporated to become more concentrated, and then added to the plating bath to replace evaporative losses.





Reduced Organic TRI Emissions



Best Access Systems stopped the usage of Perchloroethylene, eliminating 83,819 pounds of air emissions and 38,000 pounds of waste. Switching from “perc” to an aqueous solution to clean parts was not easy, given the small size of some components. BAS invented new techniques using a centrifugation to overcome this.

Lincoln Plating has reduced emissions 50-75% largely through the use of wetting agents. Floating poly balls help to prevent misting from the tanks. All of the hard chrome tanks have three-stage mesh pad scrubbers to clean the air.

Quaker City Plating replaced perchloroethylene with an aqueous biodegradable alkaline cleaner in 1996. MEK was replaced with acetone in 1998. The hex-chrome plating line was completely eliminated and replaced with Envirochrome, a process, originating in England, which uses a sulfate bath and is safer for workers and the surrounding community. These changes resulted in a 90% reduction in organic emissions.

For More Information on the SGP,
please visit the Web Site
(<http://www.strategicgoals.org/>)

Or contact any of the following persons:

Ellen Myers
City of Muscatine
563-263-2752
emyers@ci.muscatine.ia.us

Somnath Dasgupta
Rockwell Collins
319-295-3494
sdasgupt@rockwellcollins.com

Sue Behrens
Iowa Waste Reduction Center
319-273-8905
behrens@uni.net

Gary Bertram
U.S. EPA
913-551-7533
bertram.gary@epa.gov

Jeff Fiagle
IDNR
515-281-5353
jeff.fiagle@dmr.state.ia.us

The Strategic Goals Program for Metal Finishers (SGP)



Appendix H

Resource Directory

Resources for Metal Finishers

Resource	Contact Information
<p>American Electroplaters and Surface Finishers Society</p> <p>The primary mission of the AESF is to advance the science of surface finishing, to benefit industry and society through education, information and social involvement.</p>	<p>www.aesf.org</p>
<p>Coatings Alternative Guide (CAGE)</p> <p>The Coatings Guide™ contains several tools to help users identify low-volatile organic compound/hazardous air pollutant coatings that may serve as drop-in replacements for existing coating operations.</p>	<p>cage.rti.org</p>
<p>Electrocoat Association</p> <p>The Association serves the needs of all members having a direct interest in marketing the benefits of this technology to manufacturers, consumers and the global marketplace.</p>	<p>www.electrocoat.org</p>
<p>EnviroSense</p> <p>EnviroSense, part of the U.S. EPA's web site, provides a single repository for pollution prevention, compliance assurance, and enforcement information and data bases.</p>	<p>es.epa.gov/index.html</p>
<p>EPA Partners for the Environment</p> <p>The Partners for the Environment Web site provides information about EPA's many voluntary programs, and the forward-looking organizations that participate.</p>	<p>www.epa.gov/partners/</p>
<p>Iowa Waste Reduction Center</p> <p>IWRC services include practical assistance with environmental regulations and cost-saving reduction recommendations.</p>	<p>www.iwrc.org/</p>

<p>National Association of Metal Finishers</p> <p>NAMF's purpose is to advance, protect and perpetuate the surface finishing industry, and to develop the highest standards of service, quality and conduct.</p>	<p>www.namf.org</p>
<p>National Metal Finishing Resource Center</p> <p>The NMFRC provides comprehensive environmental, technical, and pollution prevention metal finishing resources.</p>	<p>www.nmfrc.org/</p>
<p>The National Strategic Goals Program for Metal Finishers</p> <p>The National SGP is a voluntary program that encourages companies to go beyond environmental compliance. Contains tools and resources for metal finishers</p>	<p>www.strategicgoals.org</p>
<p>P2 Gems</p> <p>Pollution Prevention resources for metal finishers</p>	<p>www.p2gems.org/Sites.cfm?CatID=152</p>
<p>P2RIC</p> <p>Listing of Pollution Prevention service providers in Iowa, Kansas, Missouri and Nebraska</p>	<p>www.p2ric.org/Directories/index.cfm</p>
<p>P2Rx Topic Hubs</p> <p>Pollution Prevention information on a variety of industrial sectors, including metal finishing</p>	<p>www.p2rx.org/P2InfoNexpert/alphabetic.cfm</p>
<p>Pacific Northwest Pollution Prevention Resource Center</p> <p>Metal finishing industry resources</p>	<p>www.pprc.org/pprc/sbap/metalfin.html Phone: 206/223-1151</p>
<p>Pollution Prevention Services of the IDNR</p> <p>Non-regulatory, confidential assessments offered at no cost</p>	<p>www.iowap2services.com Phone: 515/281-5353</p>

<p>Powder Coating Institute The Powder Coating Institute promotes powder coating technology and communicates the benefits of powder coating to manufacturers, consumers, and government.</p>	<p>www.powdercoating.org</p>
<p>Printed Wiring Board Resource Center Plain Language Guide to Regulations</p>	<p>www.pwbrc.org/peg/pegnew.cfm</p>
<p>Products Finishing Online component of Products Finishing magazine</p>	<p>www.pfonline.com</p>
<p>Sector Star A resource center dedicated to cleaner metal finishing. Contains tools and resources.</p>	<p>www.sectorstar.org/sector/MetalFinishing/index.cfm</p>
<p>Small Business Environmental Home Page Links to metal finishing resources</p>	<p>www.smallbiz-enviroweb.org/industry/indlinks.html#Metal Finishing2</p>
<p>Waste Reduction for Metal Finishers Waste reduction/pollution prevention hints and tips</p>	<p>es.epa.gov/techinfo/facts/vdwm/va-fs18.html</p>

Appendix I

EPA Region 7, IDNR, POTW and Service Provider Letters of Commitment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
728 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

SEP 12 1997

OFFICE OF
THE REGIONAL ADMINISTRATOR

MEMORANDUM

SUBJECT: Common Sense Initiative (CSI) Metal Finishing Sector Strategic Goals Program

FROM: Dennis Grams, P. *Dennis Grams Rec. for*
Regional Administrator

TO: David Gardiner
Assistant Administrator for Policy, Planning and Evaluation

We have reviewed the Common Sense Initiative (CSI) Metal Finishing Sector Strategic Goals Program dated August 11, 1997. Region 7 concurs with the proposed program. We look forward to the opportunity to actively participate in this new and exciting opportunity. Copies of the proposed will be shared with our state counterparts in an effort to provide them current information and encourage their participation.

Please contact our CSI liaison, Jim Callier, at (913) 551-7646, if you have any questions regarding Region 7's participation.



STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

August 21, 2003

The Iowa Strategic Goals Program (ISGP) is a voluntary program that encourages metal finishing companies to go beyond environmental compliance. ISGP member companies are offered incentives, resources and a means for removing regulatory and policy barriers as they work to achieve seven specific environmental goals. These goals include:

- 50% water reduction;
- 25% energy reduction;
- 50% reduction in land disposal of hazardous sludges and an overall reduction in sludge generation;
- 50% reduction in metals emissions to water and air;
- 98% metals utilization;
- 90% reduction in organic toxics release inventory emissions; and
- Reduction in human exposure to toxic materials in the facility and the surrounding community.

In addition, the ISGP provides a unique opportunity for state, city, and federal governments as well as industry. Within the framework of this program, all of these entities are committed to working together to achieve a common objective, to improve environmental performance and the bottom line. As a result:

- Companies receive resources and incentives to help them to go beyond compliance;
- Industry as a whole benefits from the positive action of ISGP member companies; and
- As the metal finishing industry continues to improve its environmental performance, regulators from state, city and federal governments are potentially able to re-allocate resources to work with facilities that need more assistance.

The Department encourages and endorses the effort of all the stakeholders involved in establishing this program. Not only is the environment improved but also industry benefits economically from realizing efficiencies and reductions or avoidance of waste. Truly a win-win situation.

Sincerely,



Jeffrey R. Vonk, Director



January 22, 2004

City of Cedar Rapids Water Pollution Control Facility (CRWPCF) is in full support of the Iowa Strategic Goals Program (ISGP). CRWPCF is a stakeholder in the ISGP and has been involved in the development of the Iowa program.

Benefits of participation in the ISGP could include: energy use reduction, less hazardous waste generation, less metals emissions to air and water, more efficient use of metals, reductions in organic toxics emissions, water use reduction and overall reduction of human exposure to toxic materials in the environment. Perhaps, the *most desirable benefit* is the opportunity through ISGP to interact with local, state, and federal governments to reach a common goal of saving resources and improving environmental performance.

CRWPCF would like to encourage Metal Finishing and Plating Industries as well as Pretreatment Programs across the state to consider membership in the ISGP.

Sincerely,

A handwritten signature in black ink that reads "Stephen L. Hershner".

Stephen L. Hershner
Environmental Manager, CRWPCF



January 28, 2004

ISGP Oversight Committee:

I recently reviewed development materials of the Iowa Strategic Goals Program for Metal Finishers (ISGP). Iowa's program is based on the National Strategic Goals Program for Metal Finishers but was modified to meet the specific needs of Iowa metal finishing companies. I think the program looks promising and should positively benefit Iowa's business, economic and environmental communities.

The ISGP is a voluntary program that encourages metal finishing companies to go beyond environmental compliance. ISGP member companies are offered incentives, resources and a means for removing regulatory and policy barriers as they work to achieve the specific goals of the program.

Additionally, the ISGP provides a unique opportunity for state, city, and federal governments as well as industry. As members and participants in the ISGP program all entities are committed to working together to achieve a common objective, to improve environmental performance and the bottom line.

The benefits of the ISGS program will be numerous including:

- Companies receive resources and incentives to help them go beyond compliance;
- Industry as a whole benefits from the positive action of ISGP member companies;
- As the metal finishing industry continues to improve its environmental performance, regulators from state, city and federal government are potentially able to re-allocate resources to work with facilities that need more assistance.
- Industry may benefit economically from realizing efficiencies and reduction or avoidance of wastes.

The IWRC will encourage its metal finishing clients to become ISGP members so they may reap the benefits of economic and environmental health, waste reduction, conservation of natural resources, energy conservation and pollution prevention.

Sincerely,

A handwritten signature in blue ink that reads "John Konefes".

John Konefes, Director
Iowa Waste Reduction Center

Appendix J

Summary of Pollution Control and Recycling Tax Exemption

Summary of Pollution Control and Recycling Tax Exemption

Associated rules:Iowa Administrative Code 567 Chapter 11
Code of Iowa 427.1 Exemptions

Chapter 11 Tax Certification of Pollution Control or Recycling Property

567—11.6(427) Criteria for determining eligibility.

11.6(1) *General.* Property which has been installed and is used primarily to meet an effluent standard, a water quality standard, an emission standard or to control hydrocarbons, fugitive dust, odors or other air contaminants in a reasonably adequate manner shall be considered to be used primarily to control or abate pollution of water or air of the state. Property which has been installed to meet a standard more stringent than an emission or water quality standard shall be considered to be used primarily to enhance the quality of the water or air of this state. Personal property or improvements to real property or any portion of the property, used primarily in the manufacturing process and resulting directly in the conversion of waste plastic, wastepaper products, or waste paperboard, into new raw materials or products composed primarily of recycled material shall be considered recycling property. Each request will be considered in the context of its particular circumstances.

Water - normally considered eligible.

- (1) Pretreatment facilities such as those which neutralize or stabilize sewage, industrial waste or other waste from a point immediately preceding the point of such treatment, including necessary pumping and transmitting facilities.**
- (2) Treatment facilities such as those which neutralize or stabilize sewage, industrial waste or other waste from a point immediately preceding the point of such treatment to a point of disposal, including the necessary pumping and transmitting facilities.**
- (3) Improvements to real property, e.g., ancillary devices and facilities such as lagoons, ponds and structures for the storage or treatment of sewage, industrial waste or other waste from a plant or other property.**
- (4) Standby systems or spare parts which are required for the continuous operation of other pollution control property.**
- (5) Property which exclusively conveys or transports accumulated sewage, industrial waste or other recovered materials as an integral part of the control operation.**

- (6) A building which performs no function other than housing or sheltering other pollution control property.
- (7) Sampling or monitoring equipment for water pollutants for which there are standards where such equipment is owned and operated by the owner of the source of water pollutants, and the results from the use of such equipment are submitted to the department.
- (8) Property which dissipates heat (e.g., cooling towers).

d. Water - normally considered ineligible.

- (1) Land purchased or held as a site for pollution control property or for land disposal of waste material.
- (2) Property which merely dilutes sewage, industrial waste, or other waste (including heat) unless required by the department.
- (3) Consumable or process materials (e.g., chemicals used in treatment).
- (4) Licensed motor vehicles used to transport accumulated sewage, industrial waste, other waste or recovered materials.

Code of Iowa 427.1 Exemptions

19. *Pollution control and recycling.* Pollution-control or recycling property as defined in this subsection shall be exempt from taxation to the extent provided in this subsection, upon compliance with the provisions of this subsection.

This exemption shall apply to new installations of pollution-control or recycling property beginning on January 1 after the construction or installation of the property is completed. This exemption shall apply beginning on January 1, 1975, to existing pollution-control property if its construction or installation was completed after September 23, 1970, and this exemption shall apply beginning January 1, 1994, to recycling property.

This exemption shall be limited to the market value, as defined in section 441.21, of the pollution-control or recycling property. If the pollution-control or recycling property is assessed with other property as a unit, this exemption shall be limited to the net market value added by the pollution-control or recycling property, determined as of the assessment date.

Application for this exemption shall be filed with the assessing authority not later than the first of February of the first year for which the exemption is requested, on forms provided by the department of revenue and finance. The application shall describe and locate the specific pollution-control or recycling property to be exempted.

The application for a specific pollution-control or recycling property shall be accompanied by a certificate of the administrator of the environmental protection division of the department of natural resources certifying that the primary use of

the pollution-control property is to control or abate pollution of any air or water of this state or to enhance the quality of any air or water of this state or, if the property is recycling property, that the primary use of the property is for recycling.

A taxpayer may seek judicial review of a determination of the administrator of the environmental protection division or, on appeal, of the environmental protection commission in accordance with the provisions of chapter 17A. The environmental protection commission of the department of natural resources shall adopt rules relating to certification under this subsection and information to be submitted for evaluating pollution-control or recycling property for which a certificate is requested. The department of revenue and finance shall adopt any rules necessary to implement this subsection, including rules on identification and valuation of pollution-control or recycling property. All rules adopted shall be subject to the provisions of chapter 17A.

For the purposes of this subsection "*pollution-control property*" means personal property or improvements to real property, or any portion thereof, used primarily to control or abate pollution of any air or water of this state or used primarily to enhance the quality of any air or water of this state and "*recycling property*" means personal property or improvements to real property or any portion of the property, used primarily in the manufacturing process and resulting directly in the conversion of waste plastic, wastepaper products, or waste paperboard, into new raw materials or products composed primarily of recycled material. In the event such property shall also serve other purposes or uses of productive benefit to the owner of the property, only such portion of the assessed valuation thereof as may reasonably be calculated to be necessary for and devoted to the control or abatement of pollution, to the enhancement of the quality of the air or water of this state, or for recycling shall be exempt from taxation under this subsection.

For the purposes of this subsection "*pollution*" means air pollution as defined in section 455B.131 or water pollution as defined in section 455B.171. "*Water of the state*" means the water of the state as defined in section 455B.171. "*Enhance the quality*" means to diminish the level of pollutants below the air or water quality standards established by the environmental protection commission of the department of natural resources.

Appendix K

Service Provider Descriptions

Iowa Department of Natural Resources Pollution Prevention Services

Pollution Prevention Services is a non-regulatory, confidential technical assistance service offered by the Iowa Department of Natural Resources, at no cost. Our primary customers are business and industry, institutions, and government with over 100 employees. Our flexible services strategy is designed to address the needs of the organization being assisted; and move an organization towards the adoption of sustainable business practices.

The intent of Pollution Prevention Services' comprehensive technical assistance strategy is to guide an organization through a systematic process to identify, prioritize, and implement multimedia pollution prevention opportunities. These opportunities may address water use, wastewater, solid and hazardous wastes, energy efficiency, air emissions, as well as resource conservation and others.

The scope of our technical assistance is determined by considering the needs and expectations of our customers, as well as, critical emissions/wastes, environmental regulatory requirements/status, environmental management system robustness. As such, our assistance is comprehensive, flexible, and tailored to our customers.

Our services include:

- **Initial consultation**
- **Targeted and media specific pollution prevention assessments**
- **Environmental Policy Development**
- **Aspect and Impact Identification and Significance Analysis**
- **Objective and Target Development**
- **Pollution Prevention Alternatives identification: Cost Benefit Analysis and Prioritizing**
- **Environmental Management Program Development**
- **Educational Workshops and Training**
- **Pollution Prevention Intern Program**

For more information about Pollution Prevention Services or to schedule an appointment with our team of experts call (515) 281-5353 or (515) 281-8499 or visit www.iowap2services.com.

Iowa Waste Reduction Center – University of Northern Iowa

Free Answers to Small Business Questions

Environmental regulations are a concern to many Iowa small businesses that have neither the time nor the resources to hire environmental consultants. The Iowa Waste Reduction Center (IWRC) has the answer for small businesses with environmental compliance and regulatory questions.

The IWRC, at the University of Northern Iowa, was established by the Groundwater Protection Act of 1987. It provides free, confidential and non-regulatory technical assistance to small businesses in Iowa regarding compliance with environmental requirements and pollution prevention. The IWRC helps to facilitate business retention and formation by offering environmentally responsible operating advice.

The center has provided nearly 2,300 On-site reviews to Iowa small businesses, making it a national leader in small business environmental assistance programs. Ninety percent of the IWRC educational efforts are aimed toward the primary target: Iowa businesses with 200 employees or less.

Although On-site reviews are the main service of the IWRC, a substantial amount of assistance is provided over the phone, at workshops, presentations, educational programs, and through literature.

The IWRC also serves as an “umbrella” to applied research and educational projects. These include the Iowa Air Emissions Assistance Program (IAEAP), the Iowa Waste Exchange (IWE) and the Small Business Pollution Prevention Center (SBPPC). Examples of applied research include Environmental Management System (EMS) service center, pollution prevention in drycleaning and laundry and the Mobile Outreach for Pollution Prevention (MOPP).

Another applied research program is Spray Technique Analysis and Research (STAR), dedicated to improving spray-painting techniques, which can reduce air emissions and hazardous wastes generated. STAR has helped IWRC specialists to devise Laser Touch®, a device that helps maintain proper gun-to-part distance during the paint coating process.

Like STAR, Painting and Coating Compliance Enhancement (PAC2E), another program, was developed to help small businesses with pollution prevention by educating on current painting and coating regulations for air emissions, hazardous wastes, solid wastes and waste water.

With assistance and expertise, the IWRC has become a driving force for sharing regulatory compliance and pollution prevention information with Iowa's small businesses. For technical assistance or to request an on-site review, call 1-800-422-3109 or visit www.iwrc.org.

Appendix L

Description of Select SGP Benefits

**Iowa Strategic Goals Program
Gold Level Benefit Description
Low Inspection Priority**

Applicability

Iowa SGP participants receiving this benefit will be considered low priority for routine inspections. This benefit is only available to Iowa SGP participants achieving Gold level status. To be eligible, the participating facility must; 1) submit data documenting the required SGP goals have been reached (annual Iowa SGP Worksheet), 2) submit the Iowa SGP Request for Low Inspection Priority form, and 3) meet the compliance criteria as specified in the Iowa Strategic Goals Program Description. Recommendations to award or deny any Iowa SGP benefits to the participant will be made by the Iowa Strategic Goals Program Oversight Committee. (Information on the responsibilities and composition of the Oversight Committee may be found in the Iowa SGP Program Description)

The low inspection priority benefit may be received by participants in multiple years with sustained environmental performance and compliance. Participants requesting low inspection priority for multiple years must annually document retained Gold level status and submit the Iowa SGP Request for Low Inspection Priority Form. This benefit shall not extend beyond three consecutive years unless approved by the local POTW, IDNR and EPA Region 7.

Low Inspection Priority Covers:

- Environmental programs agreed to by EPA, IDNR and participating local government. This benefit may include routine air, hazardous waste, storm water and, NPDES inspections.
- Only metal finishing operations and processes located at the Iowa SGP participant site. If participant is responsible for multiple sites, then only the site identified on the original Iowa SGP Commitment Form will be covered by this benefit.

Low Inspection Priority Does Not Cover:

- "For Cause" inspections (i.e. Citizen complaints, Worker complaints, Referrals from another agency/organization);
- Mandatory inspections required by State or Federal law;
- Federal, state or local environmental programs that are not specifically listed in the Iowa SGP Performance Ladder for such benefit;
- Facilities currently operating under a court approved action, a unilateral enforcement order and consent agreement;
- Facilities that have significant unresolved environmental violations identified from recent inspections;

- **Facilities that in any way represent an immediate threat to human health or the environment;**
- **Situation where there is a showing of evidence of a violation of permit or law;**
- **Situation where there is an emergency release or spill;**
- **Inspections conducted as part of a major enforcement initiative.**

Appendix M

Benefit Request Forms

IOWA SGP REQUEST FOR LOW INSPECTION PRIORITY

Part 1 - Facility Information

Facility Name: _____

Facility Location (street address, city): _____

	Responsible Official
Name	
Title	
Phone Number	

Part 2 – Low Inspection Priority Summary

By submittal of this form, participant requests that their metal finishing processes and activities are considered a low inspection priority by the U.S. EPA and the IDNR for a period not to exceed one year. Receipt of this benefit classifies participant facility as a low inspection priority for routine inspections and does not prohibit any environmental enforcement agency from conducting an inspection of facility if there is reason to believe a violation may have occurred or if routine inspections are required by existing rules or regulations.

This benefit may be withdrawn by the Iowa SGP Oversight Committee, the U.S. EPA or the IDNR at any time if there is reason to believe a violation may have occurred or if participant fails to meet the Iowa SGP Gold level requirements.

A full description of the low inspection priority benefit is provided in the Iowa SGP Program Description.

Part 3 – Signature and Certification

I hereby request my metal finishing processes and activities receive consideration as a low inspection priority for routine inspections conducted by the U.S. EPA and IDNR. I understand that receipt of this benefit is contingent upon review of my compliance status.

I certify that, to the best of my knowledge and based on reasonable inquiry, the facility is currently in compliance with applicable Federal, State and local environmental requirements.

Signature of Responsible Official

Title of Responsible Official

Print Name of Responsible Official

Date Signed

Note to Iowa SGP participant: Benefit becomes effective upon the signing of Part 4 by the IDNR Field Office Supervisor and will only be honored on the dates listed. Mail completed form to the following address:

Attn: Jeff Fiagle
Pollution Prevention Services
Wallace State Office Building
502 E. 9th St.
Des Moines, IA 50319

Part 4 – Acknowledgement and Recommendation

I hereby acknowledge the above facility has met the qualification requirements for the Iowa SGP gold level benefit of low inspection priority. By signing below, I recommend offering the benefit to the facility for the one year time period of _____ to _____.

Signature of Iowa SGP OC Chair

Printed Name

Date

Signature of IDNR Field Office Supervisor

Printed Name

Date

Note to INDR Field Office Supervisor: Please return the signed form to the following address:

Attn: Jeff Fiagle
Pollution Prevention Services
Wallace State Office Building
502 E. 9th St.
Des Moines, IA 50319

IOWA SGP REQUEST FOR REDUCED POTW MONITORING

Part 1 - Facility Information

Facility Name: _____

Facility Location (street address, city): _____

Responsible Official	
Name	
Title	
Phone Number	

Part 2 – Reduced Monitoring By POTW To Federal Minimum Levels

By submittal of this form, participant requests reduced monitoring by its POTW for Federal categorical end of process metal finishing wastewater indirect discharges to the POTW collection system for a period not to exceed one year.

This benefit may be withdrawn by the POTW Pretreatment representative, Iowa Department of Natural Resources, Iowa SGP Oversight Committee, or the U.S. EPA at any time there is a change in the local, State, or Federal regulations affecting this agreement, any time the local, State or Federal regulatory agencies have reason to believe a potential or actual violation by the participant of applicable local, State, or Federal codes or regulations may have occurred, if participant fails to meet the Iowa SGP Silver level requirements, or if requested by the participant.

This agreement may not affect and apply to local, State or Federal monitoring requirements pertaining to conventional pollutants used for billing purposes, non categorical pollutants use for permit compliance, combined waste streams covered under permit limits and local limits outlined in the POTW ordinances.

Part 3 – Signature and Certification

I hereby request my categorical metal finishing end of process wastewater receive consideration for reduced monitoring by the POTW Pretreatment program under the guidance outlined in Part 2 above. I understand that receipt of this benefit is contingent upon review of my compliance status by both the Iowa SGP Oversight Committee and the POTW Pretreatment office and completion of a satisfactory site inspection by the POTW Pretreatment office.

Signature of Responsible Official

Title of Responsible Official

Print Name of Responsible Official

Date Signed

Note to Iowa SGP participant: Benefit becomes effective upon the signing of Part 5 by the POTW Pretreatment Representative and will only be honored on the dates listed.

Mail completed form to the following address:

Attn: Jeff Fiagle
Pollution Prevention Services
Wallace State Office Building
502 E. 9th St.
Des Moines, IA 50319

Part 4 – SGP Facility Record Review Acknowledgement and Recommendation

I hereby acknowledge the above facility's application and supporting documentation has been reviewed and the facility has met the qualification requirements for the Iowa SGP Silver level benefit levels listed in Part 2 above. By signing below, I recommend offering the benefit to the facility for the one year time period of _____ to _____.

Signature of Iowa SGP OC Chair

Printed Name

Date

Part 5 - POTW Pretreatment Facility Record Review and Site Inspection

I hereby acknowledge the above facility's application and supporting documentation has been reviewed and the facility has been inspected by my office. My office has found that the facility:

1. Has met the requirements for a SGP Silver Level	Yes	No
2. Will be given the SGP Silver Level Benefits	Yes	No

Successful SGP applicants will receive an amendment to their permit outlining the benefits from Part 2 above within thirty (30) calendar days of approval by the POTW Pretreatment office.

Signature of POTW Representative

Printed Name

Date

Note to POTW Representative: Please return the signed form to the following address:

Attn: Jeff Fiagle
Pollution Prevention Services
Wallace State Office Building
502 E. 9th St.
Des Moines, IA 50319