

LCRA Pollution Solution Program Consideration
Date: 8/16/94

P2 Project # 01.0008.94

LCRA/TNRCC JOINT POLLUTION PREVENTION INITIATIVES.

Overview

TNRCC and LCRA share common goals regarding assistance/outreach for small businesses and industries throughout central Texas. An LCRA and TNRCC partnership focused on implementing permanent pollution prevention programs within LCRA's service area could have many benefits. LCRA would assist TNRCC by providing meeting facilities and inviting businesses, organizations and industries from the local community. TNRCC will provide education, technical assistance and training on how to implement a Permanent Pollution Prevention Program (P4) for these organizations. P4 is a voluntary, non-regulatory approach to pollution prevention on a community scale. As a result, P4 builds industry and governmental cooperation, promotes economic competitiveness for the businesses in the community and assists organizations, like LCRA, in developing environmental partnerships and fostering environmental leadership.

The rewards of these partnerships would be two-fold. First, LCRA would develop long lasting partnerships with local industries and potential vendors. Second, this partnership outreach would also benefit the local economies in rural areas such as La Grange and Bastrop.

The regulatory and enforcement functions of TNRCC often discourages industries with possible non-compliance questions and/or issues from seeking assistance from the agency. However, TNRCC has established the Office of Pollution Prevention and Recycling Division that provides engineering and technical assistance in pollution prevention options of businesses and organizations in Texas. This assistance is voluntary and non-regulatory and is free to the organizations. The goal of this program is to provide solutions to environmental issues rather than traditional enforcement actions involving costly penalties. LCRA's past involvement in this assistance program will help remove the traditional barrier with regulatory agencies that businesses have had. It will encourage local businesses and vendors, in need of assistance, to participate and to become an environmental partner with LCRA.

The types of industries located within LCRA's service area are diverse and include auto paint and body shops, dry cleaning, light manufacturing, chemical production, agricultural production and steel fabrication. These are the types of industries that have participated in the TNRCC program in the past.

The joint initiative would initially involve either the La Grange or Bastrop area and involve completing four general tasks: Task one would involve presenting the Permanent

Pollution Prevention Program (P4) to local business organizations and industry leaders. Task two would involve the education of business/industry representatives. Task three would involve on-site assistance at selected facilities, evaluation, implementation and final training. Task four would be to continue the process and promote the program to other communities.

TASK 1:

LCRA would work with the local chamber of commerce to set up a half day workshop at a LCRA "host" facility for the local business/industry leaders. LCRA would also invite it's own facility managers to attend this meeting. TNRCC would give the attendees an overview of the Permanent Pollution Prevention Program and the on-site assistance that is used as a teaching tool. LCRA would reinforce the program by presenting several case studies from it's own facilities. The business/industry leaders would then be trained how to organize a pollution prevention team and the team will be asked to attend the next meeting. The next meeting would be held approximately one month from the initial meeting and this meeting will train the team members.

TASK 2:

The team members selected by managers of the industries from Task 1 will be invited back to the LCRA host facility. TNRCC and LCRA would provide a full day workshop that would prepare team members to implement Permanent Pollution Prevention Programs (P4) at their own facilities. At the meeting several of the teams would be selected to receive on-site assistance from TNRCC. The other teams would be encouraged to visit the selected sites with TNRCC/LCRA. The LCRA host facility would also be used as a training area to "spotlight" examples of successful pollution prevention projects implemented through LCRA's on going pollution prevention efforts. The teams would also select leaders who would act as the primary point of contact between other team members, TNRCC/LCRA and the team's own facility management.

TASK 3:

The LCRA and TNRCC would assist the teams with their facility on-site evaluations and help identify areas for pollution prevention. Team members would be taught how to evaluate ideas and develop selection and screening criteria. Following evaluation, team members would then be able to prioritize identified projects for implementation. LCRA and TNRCC would also show teams how to implement the projects and also how to measure the results.

TASK 4:

The LCRA and TNRCC would assist the teams and teach them how to continue the pollution prevention process. TNRCC would publish case studies, giving business/industry state-wide recognition for their efforts. LCRA would help with organizing future workshops, technology transfer and encourage other industries to become involved with similar community outreach programs. LCRA/TNRCC would continue to develop environmental partnerships with participating businesses and industries, some of which will be suppliers to both LCRA and TNRCC.

Practical Implementation Considerations.

Implementing a joint LCRA/TNRCC pollution prevention initiative will involve considerable coordination and effort. Successful implementation will require:

1. High-level management support from both agencies. Taking the joint LCRA/TNRCC pollution prevention outreach initiative will involve coordination between both agencies and may effect the way some decisions are made and communicated at LCRA. The initiative will be non-enforcement and non-regulatory. For such changes to succeed, it will be essential to have explicit, thorough management support for the approach and its implementation.
2. Education of all participating individuals at LCRA. A pollution prevention outreach initiative will only succeed if LCRA's own program gains support and participation from a wide range of people in numerous departments of functional areas. It will be important to provide appropriate training and education of all people at LCRA who will be involved.
3. Available resources to facilitate implementation. Currently, LCRA is committing resources for the development of an internal pollution prevention program which will serve as a model for other utilities. Additional resources will be required to expand the scope to include the comprehensive outreach initiative. In-kind services from TNRCC will be available and may help reduce the additional resources required. LCRA could use this initiative to possibly receive additional federal PPIS funds in 1995 or 1996.

Summary.

In addition to minimizing environmental impacts within LCRA's service area, a joint LCRA/TNRCC pollution prevention initiative has the potential to:

- Facilitate more efficient, consistent decision making by local industries within LCRA's service area.
- Provide a clear framework for communication and coordination of environmental issues between local business/industry and the community.
- Stimulate environmental relationships between LCRA/TNRCC and industry.
- Improve local economies and "Green Marketing" of products within LCRA's service area.
- Provide education, leadership and encouragement to local Industries.
- Improve operations and efficiency at all participating facilities.
- Assist TNRCC with removal of regulatory barriers to pollution prevention.

Challenges to be met in achieving the potential benefits from a joint LCRA/TNRCC pollution prevention outreach program in LCRA's service area includes identifying additional resources and coordinating decisions through LCRA and TNRCC. The efforts will also cut across multiple people and functional areas from a diverse group of industries ranging from power production to dry cleaning.