

**South Suburban Chicago Brownfield Coalition**

**Brownfield Prevention Program:  
Model Ordinance, Resources,  
and Data**



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## **Overview of Brownfield Prevention Program**

### **Introduction**

The South Suburban Chicago Brownfields Coalition (Brownfields Coalition) is interested in mechanisms for preventing future brownfields in their communities. The coalition recognizes that to prevent future brownfields, more attention must be paid to the way in which businesses and industry handle pollution in their communities. Thus, the coalition

**Table 1-2 – Registered Companies Handling Small Quantities of Toxic Substances**

Chicago Heights/South Chicago Heights <sup>2</sup>	186
Lansing	71
Posen	22
Riverdale	47
Total	326

## Model Brownfield Prevention Ordinance Summary

The Brownfields Coalition developed a model brownfield prevention ordinance with the objective of creating an incentive for pollution prevention planning, and to establish an assurance that larger companies have the capacity to address contamination problems should they occur. The ordinance would make pollution prevention a requirement for doing business in each community. The text of the ordinance is presented in Tab 2 and is summarized as follows:

- A. Applicability. The ordinance applies to both large and small owners and operators of facilities that handle hazardous substances, materials, and wastes as defined by the U.S. Superfund Amendments and Reauthorization Act of 1986, the Resource Conservation and Recovery Act (RCRA), and the Illinois Environmental Protection Act, as well as facilities that reprocess construction and demolition materials.
- B. Purpose. The purpose of the ordinance is to require any relevant owner or operator to prepare and submit an annual pollution prevention plan as a condition of receiving a new or renewed business license.
- C. Fees. For larger companies that are required to report their handling of toxic substances to the federal government, a \$1,000 fee is required in addition to submitting a pollution prevention plan. If large reporting companies do not submit a pollution prevention plan, they must pay larger fees: \$5,000 for companies that use, handle, store, or release less than 50,000 pounds per year, plus \$.01 per additional pound used, handled, stored, or released above 50,000 pounds per year. The idea behind the fees is to create an incentive for companies to submit pollution prevention plans. Companies that handle small quantities of hazardous substances are not required to pay any fees, but they must submit a pollution prevention plan. Lastly, companies that manage and recycle construction and demolition debris are required to pay a flat fee and submit a pollution prevention plan.
- D. Pollution Prevention Requirements. The model ordinance requires that pollution prevention plans include a written policy demonstrating management commitment for the plan and its implementation; information on the substances uses; objectives and pollution prevention targets; updates on prior pollution prevention activities; upcoming activities; and an implementation schedule.
- E. Proof of Insurance. The model ordinance calls for owners and operators that report releases to the Toxic Release Inventory or are RCRA large quantity generators to provide the municipality with a proof of adequate pollution insurance as a condition of obtaining a new or renewed business license. The ordinance requires that the insurance policy have the equivalent effect of a general liability policy that “buys back” the standard pollution insurance

coverage as outlined in the 1992 Insurance Service Office commercial general liability insurance form that would normally be excluded.

The ordinance would begin to instill a culture of pollution prevention within south suburban communities. Based on recent data, the approximate number of pollution prevention plans that would be submitted by community is as follows:

Chicago Heights/South Chicago Heights	204
Lansing	75
Posen	22
Riverdale	53
<b>TOTAL</b>	<b>354</b>

Larger companies will typically already have pollution prevention plans in place and would likely have no difficulty complying with the ordinance. The ordinance would have an impact on smaller companies that that may not have ever considered pollution prevention. Technical assistance, guidance, and training from the municipalities and/or the South Suburban Mayors and Managers Association would have to be provided. Costs for this technical assistance would partially be defrayed through the fees collected as outlined in the ordinance.

Based on the most recent data, the effect of the fees provision of the ordinance would be as follows:

**Scenarios**

- A. Companies submit pollution prevention plans and pay \$1,000 fee.
- B. Companies do not submit pollution prevention plans and use, handle, store, or release less than 50,000 pounds per year
- C. Companies do not submit pollution prevention plans and use, handle, store, or release more than 50,000 pounds per year

Scenario	Chicago Heights		Lansing		Posen		Riverdale		So. Chicago Heights	
	#	\$	#	\$	#	\$	#	\$	#	\$
<b>A</b>	17	17,000	4	4,000	-	-	6	6,000	2	2,000
<b>B</b>	8	40,000	1	5,000	-	-	2	10,000	2	10,000
<b>C</b>	8	118,213	3	114,327	-	-	3	18,882	-	-

These numbers were derived by using the data in Tabs A through E to determine the companies that would be required to pay the \$1,000 fee, and the number of companies that use, handle, store, or release more and less than 50,000 of hazardous substances per year.<sup>3</sup> Because of the impact of the fees in the ordinance, it is unlikely that Scenario C

<sup>3</sup> In addition, construction and demolition material handlers have been included based on the *Chicagoland Construction and Demolition Site Recycling Directory* (1997). This directory lists only two companies, one in Chicago Heights, and one in Riverdale.

would ever occur. Rather, some funds would be generated through the fee structure, but more importantly, companies would be preparing, submitting, and updating pollution prevention plans that would demonstrate company efforts for managing and preventing pollution in each community. Based on these plans, the municipalities can identify pollution prevention technical assistance needs.

## **Data and Information**

There is a wealth of publicly available data and information available from the U.S. Environmental Protection Agency and the Illinois Environmental Protection Agency on pollution issues by company in each municipality. This information can be used to gain a thorough understanding of the volumes of pollutants handled, types of pollutants, and reporting trends from year to year. The data and information can help a municipality target pollution prevention outreach activities. Tab 3 includes a description of the environmental databases and resources that are readily available and how to access the data. Tabs A through F includes actual data from these databases for each municipality.

## **Government and Technical Resources**

There are several government agencies and technical resource providers that have a regulatory obligation with respect to chemical use and pollution, or are available to assist in pollution and brownfield prevention activities. Tab 4 identifies these agencies and provides contact information.

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## **Model Brownfield Prevention Ordinance**



commission, political subdivision, any interstate body, or any other legal entity, or their legal representatives, agents, or assigns and includes public or private utilities, governmental bodies or agencies, and common carriers.

6. Pollution Prevention. "Pollution prevention" means eliminating or reducing at the source the use, generation, or release of toxic pollutants, hazardous substances, hazardous materials, and hazardous wastes.
7. Release. Release means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles) of any hazardous material, substance, and/or waste.
8. Reprocessable Construction/Demolition Material. "Reprocessible construction/demolition material" shall mean broken concrete, bricks, rock, stone or paving asphalt generated from construction or demolition activities.

### **Section III. Brownfield Prevention Fees**

A. Any owner or operator who applies for a new or renewed business license in [municipality] and *is* subject to the reporting requirements of the Toxic Chemical Release Reporting: Community Right to Know program (also know as Title III of the Superfund Amendments and Reauthorization Act of 1986 and the Emergency Planning and Community Right to Know Act of 1986) or *is* considered to be a large quantity generator under the Resource Conservation and Recovery Act shall submit a pollution prevention plan as set forth in Section IV plus an annual \$1,000 brownfield prevention fee. In lieu of submitting a pollution prevention plan, the owner operator may choose to pay fees as set forth below.

1. \$5,000 if less than 50,000 pounds of hazardous material(s), substance(s), and/or waste(s) are used, handled, stored, or released at a facility on a yearly basis.
2. \$5,000 plus \$.01 per each additional pound of hazardous material, substance, and/or waste above 50,000 pounds that is used, handled, stored, or released at a facility on a yearly basis.

B. Any owner or operator who applies for a new or renewed business license in [municipality] and uses, handles, stores, or releases hazardous materials, substances and/or wastes and is *not* subject to reporting requirements of the Toxic Chemical Release Reporting: Community Right to Know program and is *not* a large quantity generator under the Resource Conservation and Recovery Act shall submit a pollution prevention plan as set forth in Section IV, but is not required to pay a fee.

C. Any owner or operator who applies for anew or renewed business license and handles reprocessible construction/demolition material shall submit a pollution prevention plan as set forth in Section IV plus and annual \$1,000 brownfield prevention fee.

D. Fees required under this section must be paid to the [municipality] by [date]. The fees shall be credited to the [municipal] brownfield prevention fund.

#### **Section IV. Pollution Prevention Requirements**

Owners or operators submitting pollution plans must include the following specific elements.

1. Written policy demonstrating management and corporate support for the pollution prevention plan and a commitment to implement the planned activities and achieve the established goals.
2. A list of hazardous materials, substances, and/or wastes used, handled, stored, or released at each facility, and/or reprocessible construction/demolition material handled at each facility; and a map, floor plan, or site plan identifying

3. The policy must provide that the insurer may not cancel, terminate or fail to renew the policy except for failure to pay the premium.
4. In lieu of an insurance policy, the owner and operator may submit evidence of self-insurance.

#### **Section VI. Effective Date**

This ordinance being deemed of immediate importance shall become effective upon passage and publication.

#### **Section VII. Inspection**

Municipality shall have the right to inspect the site to insure compliance with the provisions of this ordinance.

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## **Data and Information**

### **Accessing Environmental Information**

data in a raw format with little or no interpretation while other websites, such as Environmental Defense Chemical Scorecard ([www.scorecard.org](http://www.scorecard.org)) provide a high level of user interface and data interpretation. The user interface, or data format, one chooses depends on the purpose for collecting the data, level of detail needed, and the ability of the user to manage and interpret the information.

Data available in a raw format (e.g. all the data is downloadable to a spreadsheet) allows the user more freedom to interpret, compare, and customize the data for a specific purpose. Generally, raw data is presented in a greater level of detail allowing the user to customize the information and draw specific conclusions. Raw data, however, requires the user to be knowledgeable about the data set and to be familiar with spreadsheet programs, such as Excel. For instance, the tables showing TRI, BRS, and ERNS information, presented in Tabs A through F, were developed using raw data downloaded from the OMB Watch website ([www.rtk.net](http://www.rtk.net))

## Database Quick Reference Chart

TRI	BRS	RCRAInfo	ERNS	RMP	LUST	SRP
Releases and transfers of <b>toxic chemicals</b> .	Tracks generation, shipment, and receipt of <b>hazardous waste</b> .	Provides information about regulated <b>RCRA hazardous waste handlers</b> -including small quantity generators.	Record of reported <b>toxic spills/releases</b> .	<b>Risk management plan</b> for facilities using certain chemicals over specific threshold quantities.	Record of reported <b>underground storage leaks</b> .	Status of all voluntary <b>site remediation projects</b> .
www.rtk.net	www.rtk.net	<a href="http://www.epa.gov/enviro/">www.epa.gov/enviro/</a>	www.rtk.net	//epa.gov/ceppo	www.epadata.epa.state.il.us/land	<a href="http://www.epadata.epa.state.il.us/land">www.epadata.epa.state.il.us/land</a>

## **Environmental Database Resources**

### **Toxic Release Inventory (TRI)**

Description: TRI is a database of information about releases and transfers of toxic chemicals from manufacturing facilities. The TRI chemical list consists of

## Biennial Reporting System (BRS)

**Description:** The BRS tracks the generation, shipment, and receipt of hazardous waste as defined by the Resource Conservation Recovery Act (RCRA). BRS is a national system that collects data on the generation, management, and minimization of hazardous waste. This system captures detailed data on the generation of hazardous waste from large quantity generators and data on waste management practices from treatment, storage, and disposal facilities. The biennial data provide a basis for trend analyses. Data about the previous year's hazardous waste activities is reported on even years by the facilities to EPA. 1999 total waste generated data is currently available but not 1999 EPA waste codes.

A large quantity generator is defined as:

- Generates in any single month more than 1,000 kg (2,200 lbs) or more of a RCRA hazardous waste.
- Generates in any single month, or accumulates at any time, 1 kg (2.2 lb) or a RCRA acute hazardous waste.
- Generates or accumulated at any time more than 100 kg (220 lbs) of spill cleanup material contaminated with RCRA acute hazardous waste.

### Reporting

**Criteria:** Facilities meeting the following criteria are required to report under BRS:

- Facility is a large quantity generator of RCRA hazardous wastes; or
- Facility treats, stores, disposes (TSD) RCRA hazardous waste on site in units subject to RCRA permitting requirements.

**Significance:** BRS reporting is an indication of the size of a company since only the largest quantity generators are required to report under BRS. Also, BRS can be used an indicator of the environmental intensiveness of on-site operations since RCRA listed or characteristic wastes are typically the more hazardous compounds.

**Limitations:** BRS data does have certain limitations.

- BRS data is only reported every other year.
- BRS does not include small quantity generators that are generally more commonly found in communities.
- BRS data is self-reported by the facility.

**Website:** BRS data can be accessed from the following websites:

- [www.rtk.net](http://www.rtk.net)
- [www.epa.gov/enviro/index\\_java.html](http://www.epa.gov/enviro/index_java.html)



## Biennial Reporting System (BRS)- continued

Hazardous waste information can be accessed via the U.S. EPA Envirofacts database via links to Biennial Reporting System and Hazardous Waste. The Biennial Reporting System provides information on large quantity generators while the Hazardous Waste link provides general large and small quantity RCRA generator data; however, this information is not typically chemical specific. Data can be viewed on a state, county, or facility basis.

Guidance: Guidance for using the downloadable data from the OMB Watch website ([www.rtk.net](http://www.rtk.net)) can be accessed via the Support tab on the website homepage. Information is provided about each database accessible via rtk.net and importing data into spreadsheets.

Guidance for using U.S. EPA Envirofacts data can be obtained via the First Time User link at the Envirofacts homepage ([www.epa.gov/enviro/index\\_java.html](http://www.epa.gov/enviro/index_java.html)).

## **Envirofacts Database (RCRAInfo)**

Description: Envirofacts is a single point of access to select U.S. EPA environmental data. This website provides access to several EPA databases containing information about environmental activities that may affect air, water, and land anywhere in the United States. Information can be retrieved by entering a specific ZIP Code, City and State, or County and State.

The information presented herein is from the U.S. EPA RCRAInfo database, accessible through Envirofacts. The RCRAInfo system allows tracking of many types of information about the regulated universe of

Limitations: RCRAInfo data does have certain limitations.

- Limited information about the quantity and type of RCRA hazardous waste handled.
- Limited information about the current status of the facility.
- Data is not readily downloadable into a spreadsheet format.

Website: RCRAInfo data can be accessed from the following website:

- <http://www.epa.gov/enviro/>

Guidance: Guidance for using U.S. EPA Envirofacts data can be obtained via the First Time User link at the Envirofacts homepage ([www.epa.gov/enviro/index\\_java.html](http://www.epa.gov/enviro/index_java.html)).

## Emergency Response Notification System (ERNS)

**Description:** The ERNS database is a record of phone calls made to the National Response Center (NRC) concerning spills or releases of toxic substances, including oil spills. The ERNS database has information for reporting years 1989 to 1997 for certain communities.

### Reporting

**Criteria:** The ERNS database includes any spill reported to the NRC.

**Significance:** ERNS information is a general indicator of the quality of operations at a facility. For instance, operational issues may exist at a facility that reports a large number of spills in a short timeframe. Also, the quantity of chemical, type of chemical, and response action are indicators of potential on-site contaminations.

**Limitations:** Limitations associated with ERNS data include:

- Facilities are often unsure of the threshold reporting quantities so every spill, no matter how small, is reported.
- Database is not updated in a timely manner.
- ERNS information is self-reported by the facility.

**Website:** ERNS data can be accessed from the following websites:

- [www.rtk.net](http://www.rtk.net)

**Guidance:** Guidance for using the downloadable data from the OMB Watch website ([www.rtk.net](http://www.rtk.net)) can be accessed via the Support tab on the website homepage. Information is provided about each database accessible via rtk.net and importing data into spreadsheets.

Information about the ERNS data can also be found at the U.S. EPA website- <http://www.epa.gov/ceppo/ap-chan.htm>. The data, however, is not accessible from this website.

## U.S. EPA Risk Management Planning

Description: Owners or operators of a stationary source with more than a threshold quantity of a regulation toxic and/or flammable substance are required to submit a risk management plan. The plan contains three elements: a hazard assessment, a prevention program, and an emergency response program.

**RMP data is currently not available due to the events of September 11, 2001.**

### Reporting

Criteria: Facilities subject to Clean Air Act Section 112 (r) are required to submit an RMP. Owners or operators of a stationary source with more than a threshold quantity of a regulated substance (one of the 140 listed toxic substances in 40 CFR 60.130) in a process as determined in 40 CRF 60.115 must submit a Risk Management Plan and comply with RMP requirements.

Significance: RMP requirements are an indication of the hazard and flammability level of the chemicals used on-site. RMP information is especially important to first-responders and Local Emergency Planning Councils (LEPC).

Limitations: The primary limitation with RMP is the ability to access the data due to the events of September 11, 2001.

Website: When available RMP data can found at the following website:

- [www.epa.gov/ceppo/](http://www.epa.gov/ceppo/)

Guidance: Information about access and using the RMP data can be found at the U.S. EPA website [www.epa.gov/ceppo/acc-pre.html](http://www.epa.gov/ceppo/acc-pre.html). The data, however, is not accessible from this website.

## Illinois EPA Leaking Underground Storage Tanks

**Description:** The Illinois Environmental Protection Agency LUST database identifies the status of all Illinois LUST incidents reported to the Illinois Emergency Management Agency (IEMA) and to the Illinois EPA. The LUST database is updated periodically as incidents are reported. Data provided herein is as of July 2002.

At this time the data is not available from the Illinois EPA website in a downloadable format. A Freedom of Information Act Request must be submitted to the Illinois EPA to receive electronic data files.

### Reporting

**Criteria:** After a facility reports an incidents the Illinois EPA and IEMA the facility has to follow-up with a 20 day report showing human health affects were mitigated, a 40 day report containing information on the nature of site and spill and beginning abatement efforts, a site classification report and finally a corrective action report.

**Significance:** LUST data can provide trend information on whether a company has multiple leaks over the years. Leaking storage tanks can be an indicator that the company is not properly caring for its facility, it may be a sign of company dumping, or that the company is leaving the area.

**Limitations:** One of the limitations with the LUST database is that is only accounts for those facilities that actually reported their leaks to the appropriate agency. The database does not account for residential leaks or some cases of heating oil leaks.

**Website:** LUST data can be accessed from the following websites  
[www.epadata.epa.state.il.us/land/ust/index.html](http://www.epadata.epa.state.il.us/land/ust/index.html)

**Guidance:** Information about the data presented on the Illinois EPA LUST website is provided on the LUST homepage-  
[www.epadata.epa.state.il.us/land/ust/index.html](http://www.epadata.epa.state.il.us/land/ust/index.html). Additional information can be obtained by contacting the Illinois EPA Bureau of Land.

## **Illinois EPA Site Remediation Program (SRP)**

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## Government and Technical Resources

### Role of Government

This section lays out the relationship between the U.S. Environmental Protection Agency (EPA) Region V, the Illinois Environmental Protection Agency, Cook County governmental agencies, and local government agencies with respect to permitting, compliance, and pollution prevention.

Below is an excerpted section from “Customer Service in Permitting: a toolkit for regions, state, tribes, and local permitting authorities” U.S EPA 1999 (<http://www.epa.gov/customerservice/permits/>). This summarizes, generally, the different responsibilities at each level of government and is graphically represented in the attached figure. The organizational structure of both the U.S. EPA and the Illinois EPA have also been included at the end of this section.

#### Headquarters

- promulgate permit regulations that are understandable, written in plain English, and workable.
- write guidance materials that clarify the intent behind the permitting requirements, and the rationale leading to final regulatory decisions.
- make interpretations on a case-by-case basis whenever questions arise.
- stress consistency in application to take the guess work out of implementation.

#### Regions

- write guidance in plain English.
- tailor training programs to meet the needs of delegated permitting authorities.
- make permit oversight reviews productive and to the point, taking into account circumstances specific to the permit.

#### State/Tribal/Local Government

- write permits that reflect the unique nature of the permit applicant’s situation.
- seek input from the permit applicant and other interested and impacted parties.
- make permit decisions after carefully weighing all of the input from the permit applicant and the interested and impacted parties...”

Table 4-1, the Role of Government Agencies, explores in greater detail the responsibilities of each bureau or division.

### Technical Assistance Providers

Table 4-2 provides information both locally and in some cases nationally for where to find resources and services related to pollution prevention. Contact information is given and at the bottom of the chart is a listing of extra websites that may be of use.



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