

Toxic Reduction Advisory Committee

Meeting Summary

August 5, 2008

The second meeting of the Toxics Reduction Advisory Committee (TRAC) was held on August 5, 2008 in Seattle, Washington at Seattle University. These notes are available on the Department of Ecology's website.¹

The following Committee members attended the meeting:

- **Ray Carveth**, King County Local Hazardous Waste Management Program
- **Wayne Clifford**, Washington State Department of Health (arrived late)
- **Joyce Cooper**, University of Washington Department of Mechanical Engineering
- **Alan Durning**, Sightline Institute
- **Kelly Flynn**, BP Cherry Point
- **Steve Gilbert**, Institute of Neurotoxicology and Neurological Disorders
- **Mel Oleson**, The Boeing Company
- **Darin Rice**, Washington State Department of Ecology
- **Ivy Sager-Rosenthal**, Washington Toxics Coalition
- **Gary Smith**, Independent Business Association
- **Dan Coyne**, Agricultural Industry (substituting for Jim Jesernig)

The following Committee members were unable to attend the meeting:

- **Jim Jesernig**, Agricultural Industry
- **Ray Lam**, Boise Cascade Paper Division
- **Alan Link**, Washington State Labor Council
- **Mo McBroom**, Washington Environmental Council
- **Claudia Rojas**, Crown Cork and Seal Co.
- **Daryl Robins**, GE Aviation LLC Yakima

The following individuals presented information:

- **Tom Boucher**, Washington State Department of Ecology
- **John Earl**, Canyon Creek Cabinet Company
- **Pam Eliason**, Massachusetts TURI Program
- **Rachel Massey**, Massachusetts TURI Program
- **Joel Tickner**, Lowell Center for Sustainable Production
- **Rob Reuter**, Washington State Department of Ecology

The following representatives from government agencies signed in:

- **Dennis Johnson**, Washington State Department of Ecology
- **Peggy Morgan**, Washington State Department of Ecology
- **Ken Zarker**, Washington State Department of Ecology

¹ <http://www.ecy.wa.gov/programs/hwtr/TRAC/index.html>

Additional stakeholders and members of the public who attended the meeting:

- **Gwen Vernon**, Cascadia Consulting Group

Laura Blackmore (Cascadia Consulting Group) facilitated the meeting, and Matt Schoellhamer (Cascadia Consulting Group) took notes.

Convening and Introductions

Laura Blackmore convened the meeting and Committee members introduced themselves.

Laura reviewed the original Committee charges from the Legislature, the key themes from the June 23rd meeting, today's agenda, and the Committee ground rules and the rules governing the modified consensus approach.

Desired outcomes from today's meetings are:

- Achieve a firm understanding of the current program.
- Give Ecology direction to develop a fee structure scenario to build on for the next meeting on September 10th.

Questions

- **Why are so many Committee members missing?**
 - Several people are not here for scheduling reasons, although not everyone has arrived who RSVPed to be here.
- **In the last meeting, did the Committee agree only to reduce chemicals purchasing and use, or are we interested in reducing waste too?**
 - The charge is to address use, but both topics are on the table, particularly with regard to the fee structure. Ecology would welcome any reductions.

Ecology's Current Pollution Planning (P2) Program

Tom Boucher provided an overview of Ecology's current program. The program uses the federal Toxics Release Inventory list (TRI), which includes approximately 600 chemicals, as well as the Montreal Protocol list of ozone depleters. Neither list has changed significantly in recent years.

Tom reviewed the universe of P2 Planner businesses, which includes approximately 600 businesses, and reiterated that the committee's focus is on reducing toxics use by businesses.

Ecology's strategies for reducing toxic waste are: encouraging Environmental Management Systems (EMSs) and planning outreach to business sectors, in addition to helping individual businesses.

Business outreach consists primarily of individual business site visits, including integrating Lean & Green management practices and outreach by the Technical Resources for Engineering Efficiency (TREE) team.

P2 planning facilities submit plans in a variety of formats. Many use a voluntary reporting format made available by Ecology which allows the information to be easily added to a database. Information was

presented from the 330 out of 600 P2 businesses which submitted the voluntary format in 2006. This includes information about products containing hazardous substances used the previous year (e.g. how much paint, adhesives, solvents, etc), the percentage of each product represented by each chemical, and the total quantities of each chemical used annually. Ecology has not analyzed the relative toxicity of all the chemicals found on these forms, just particularly toxic ones. Much of the chemical information recorded on these forms can also be found on the Material Safety Data Sheets (MSDS).

Ecology has reduced the time businesses take to complete the plan and its staff is considered very helpful by businesses. The publications on Ecology's website are also helpful and often used.

Questions and Comments Regarding the Current P2 Program

- **Is toxic material information standardized to provide information on chemical use in Washington?**
 - All information submitted on Ecology's voluntary format is standardized, entered into a database, and available. Information submitted in other formats is available but not in a database.
- **How long does a P2 Plan last?**
 - Planning is on a five year cycle, with annual progress reports and major updates every fifth year. Planning continues until the facility goes under the thresholds that brought it into the program.
- **Isn't only a portion of a P2 plan public?**
 - Businesses have the option of restricting access to everything except an executive summary, but in practice virtually no businesses take this option.
- **Be careful using MSDS numbers; they are unreliable. The system is being replaced by the Global Harmonized System (GHS). Industry would prefer switching over to this model, but the US and EU are not ready for such a switch. The State and industry will need to follow the Federal lead on GHS.**
 - Small business doesn't have the staff to make such a change on its own.
- **How many waste reduction opportunities do you expect a participating P2 business to implement?**
 - Ecology surveyed planners: on average, they reported making "some" changes due to planning. Data on how many changes each business expected to implement is available, but not in a way that is tied to the survey.

Canyon Creek Cabinet Company Case Study

In 1991, the Canyon Creek Cabinet Company was required to implement a P2 plan for the first time. With technical assistance provided by the Department of Ecology, the company moved on to an Environmental Management System (EMS).

Canyon Creek is a medium to high-end cabinet manufacturer that makes 1,000 cabinets a day and employs 500 people. They received a "Lean and Green" grant from Ecology and the EPA, which helped them apply value stream mapping to their facility to identify where wastes were being generated and the

economic costs of those wastes. Ecology has also provided the latest training tools, which have been helpful, and is available to provide personal attention and useful assistance. Resulting upgrades, particularly to their coating processes and the types and uses of equipment, have dramatically reduced waste and costs. The company has not needed to file a TRI report in the last three years.

Despite their progress, the company is continually seeking out new ways to improve their practices and increase efficiency, including applying pressure to their suppliers. Opportunities still exist, as the company has yet to address chemical use as comprehensively as waste.

Questions and Comments

- **Does Canyon Creek have graphs of chemical use as well as waste?**
 - Yes, they use purchasing data, and have developed calculators that demonstrate the return on those investments. Right now they are investing in a solvent still that will reduce acetone use from 152 drums per year to 15, and they expect a 6-month payback period.
- **You have done amazing work, what brought you to the table?**
 - The process started with the development of our P2 plan. Canyon Creek wants to be a leader in its industry.
- **What did the Lean & Green grant consist of?**
 - Washington Manufacturing Services (WMS) and Ecology provided a training for 60 employees which integrated environmental waste reduction into traditional lean techniques. Then WMS and Ecology demonstrated potential waste and cost savings and implemented kaizen events to address these potential actions. They also provided a one-week training on value stream mapping and three one-week kaizen trainings.
- **Would you have gotten where you are without Lean & Green?**
 - Canyon Creek had addressed these issues before, but Lean & Green served as a tipping point and increased the pace of change. The value stream map really opened the company's eyes to the potential for reducing all wastes, including environmental ones.
- **Are you able to adjust production to minimize waste for a specific project?**
 - Yes.
- **Are your colors created by batch or in real time?**
 - It can be done either way. They typically make colors in real time, so there is no excess left after a job.
- **Ecology clarifies that the pilot programs were a joint offering of Ecology and WMS, with WMS providing lean training and Ecology the "green" training. The grant was \$30,000 total.**
- **Are your newer projects the result of a lean process? How confident are you in the new alternative chemicals?**

- Any change to formulation has to go through me as the environmental manager. The company is always looking to improve its products, but we also need to meet our environmental goals.
- **Was the grant the catalyst to make these changes happen?**
 - Yes, it played a role. This would be a good program for Ecology to continue to make available to businesses.

Cherry Point Refinery Case Study

Kelly Flynn provided an overview of Cherry Point's participation in the P2 Planning process. The refinery holds an annual summit for 100 employees to address how the company can improve its practices. With its chemical suppliers onsite, the facility has considerable potential for future improvements.

Questions and Comments

- **Has Cherry Point installed new high-efficiency valves which reduce waste?**
 - Kelly was not sure.

Other Case Studies

Rob Reuter of the Department of Ecology helps make business' operations more efficient and environmentally sound based on the business's own cost data. There are other examples of businesses that have reduced their hazardous waste generation. A Richmond Beach asphalt storage facility was able to reduce its waste by 100,000 lbs of hazardous waste annually, saving \$800,000, by supplying some of its "waste" to be burned as fuel in a local cement kiln, which reduces the amount of high-mercury fuel the kiln would have bought otherwise. Boeing also realized considerable cost savings by implementing a range of water efficiency upgrades as part of Ecology's Cleaner Production Challenge program.

Questions and Comments

- **Is all of this outreach paid for under the current fee structure?**
 - Yes, and service is given to others who request it, whether they are a planner or not. A participating business is free from regulatory penalties unless there is an imminent danger to human health or the environment.

Examples of Effective Toxics Use Reduction Programs

Massachusetts Toxics Use Reduction Act (TURA) Program

Pam Eliason, Rachel Massey, and Joel Tickner provided an overview of Massachusetts's TURA and Toxics Use Reduction Institute (TURI) programs. Massachusetts concluded that reducing toxics use was the correct approach, and passed TURA in 1989. The program has three partners: TURI provides research and community-based outreach, the Office of Technical Assistance (OTA) provides confidential onsite technical assistance to businesses, and the Department of Environmental Protection (DEP) oversees compliance and enforcement. In addition to toxics use research and community outreach, the TURI branch of the program includes a lab that will test products and provide ideas for less toxic

alternatives to businesses for free, as well as a searchable database of these products and a library with the largest collection of materials on toxics in the state.

The act defines toxics use reduction as either direct (switching to an alternative or redesigning the product), indirect (process modification or operations and maintenance improvements), or in-process improvements. It was determined that focusing on use would maximize the benefits for both environmental and worker health.

Companies are required to report under TURA if they have more than ten fulltime employees, and meet minimum thresholds for material production or use of TRI chemicals. Currently approximately 600 facilities submit TURA reporting, which includes chemicals used, any byproducts generated, the quantities of hazardous chemicals in the product, and an economic activity index that provides information on total production. Reporting is on a production unit basis. All data provided by TURA businesses are available to the public via a searchable internet database.

From 1990-2005 the program reports a 40% reduction in total chemical use, adjusted for total production, as well as a 71% reduction in the generation of toxic byproducts and a 91% reduction in on-site releases.

A 1998 TURA program evaluation found that 70% of businesses identified toxics use reduction options in their submitted plans, 81% of businesses implemented one or more options as a result, and two thirds of these businesses reported realizing cost savings and health and safety benefits. Materials accounting was rated as the most valuable component of the TURA process. Overall, the program's benefits were found to exceed its costs by \$14 million, even without including human health, ecological, and other non-monetized benefits. Preliminary results from a 2008 evaluation have indicated that these benefits are continuing to be realized, even after almost 20 years.

TURA was amended in 2006 to lower the per-business threshold for higher-hazard chemicals and raise the fees on those chemicals, lower the fees for low-hazard chemicals, encourage EMS and Resource Conservation plans by TURA businesses, and charge a science advisory board to identify high-hazard substances. As a part of the amendment process, the TURA fee structure is also being revised. These revisions will consider accounting for the quantity of chemical produced, weighing the per-chemical fee more heavily than the base fee, lowering fees for smaller companies, and tying the fees to chemical hazard.

The lessons of the TURA program have been to focus on use, have clear and ambitious goals, focus on facility and chemical management, develop good metrics to measure progress, balance mandatory and voluntary elements, include a science advisory board, work with industry advocates, and focus on free or low-cost technical assistance in the case of small businesses.

Moving forward, the program could be improved by including larger sectors, such as health care, that produce sizable quantities of toxics, as well as by examining lowering the ten employee threshold, adding additional chemicals, addressing toxics in finished products, promoting safer alternatives, and reviewing the fee structure. The Massachusetts Legislature is, in fact, already considering a Safer Alternatives bill.

Despite the apparent success of the TURA program, there has not been demand to develop similar programs in other parts of the US. However, many states have moved or are moving to reduce toxic waste through legislation that falls into one of several categories:

- Multi-chemical bills, such as Washington's PBT strategy.
- Single-chemical initiatives, most of which have targeted Mercury.
- Adoption of the precautionary principle, as in San Francisco.
- Biomonitoring and environmental health tracking.

- Data collection and Right to Know, such as California Proposition 65.
- Alternatives assessment.
- Green chemistry, such as the Michigan Executive Directive 2006-6.
- Product stewardship, especially as related to electronics waste recycling.
- Environmentally preferable purchasing and procurement.

Questions and Comments Regarding the TURA/TURI Program

- **What are you doing in the context of REACH?**
 - TURA has focused on bringing companies up to speed on REACH requirements before regulations come into play. The Restriction of Hazardous Substances (RoHS) directive is also a big factor for Massachusetts companies, and TURI has helped many companies develop lead free electronics to comply with Europe.
- **What is the definition of manufacturing, and who falls under that definition?**
 - TURA defines manufacturing by Standard Industrial Classification (SIC) code. The list of codes will be provided to the Committee.
- **What does it cost to run TURI?**
 - \$1.67 million annually over the last two years. The overall program budget (including OTA and DEP) is about three times greater. The program is designed so that the fees equal the agency budget.
- **Are the fees fixed in the statute or do they adjust over time?**
 - The fees have not changed since the second year of the program, even though they are supposed to rise with the cost of living. Fee adjustment will be addressed as part of the act amendment.
- **Has TURI identified the share of overall toxics use in Massachusetts produced by TURA businesses?**
 - TURI does not have that data, although a survey found that small drycleaners actually use more perchloroethylene than large generators do.
- **How efficient and effective has the three-legged stool model been?**
 - It is a powerful model because each partner agency has a distinct role to play. In particular, technical assistance (OTA) and education (TURI) are completely distinct from oversight (DEP). The downside is increased coordination, including holding a 1-2 hour agency head meeting every two weeks. Joel thinks the benefits far outweigh the costs.
- **How much do you spend on alternatives assessments and R&D?**
 - The staff is housed at UMASS-Lowell. This access to UMASS faculty allows them to coordinate research needs between industry and academics very efficiently.

- **Has TURA addressed agricultural pesticide use at all?**
 - Agriculture is not one of the SIC codes covered in TURA. The act would only apply if there were pesticide manufacturers in the state. The program does conduct some outreach on green lawns and other pesticide topics under the community program.

Programs in Other States

Tom Boucher introduced a list of pollution prevention programs in other states, and noted their remarkable similarity to each other.

Questions and Comments Regarding Programs in Other States

- **Which States are Massachusetts's competitors for the most comprehensive program?**
 - Massachusetts is considered to be the gold standard program for toxics use reduction, although Minnesota's (MNTAP) and Kentucky's program are also well thought of. New York's program is improving, and New Jersey's has a robust material accounting program. Washington is in a unique position because of the duration of its program, and the availability of consistent funding.

Draft Scenarios

The Committee analyzed the draft program scenarios developed by Ecology. The three draft scenarios were 1) the current program, 2) the minimum changes to the current program that would meet the Committee's charges, and 3) an additional step beyond scenario 2. Each scenario was divided into eight themes. Darin Rice introduced each theme, followed by Committee discussion of that theme. Ecology will incorporate any recommendations and expand on these proposals for the next meeting. Ecology requested that the Committee also point out any aspects of the Massachusetts program that Washington should consider incorporating.

Initial Comments

- The ultimate goal is to engage businesses. This approach is too programmatic in orientation to achieve that. I would start in a totally different place.
- Today's Canyon Creek Case Study showed leadership and demonstrated a program that has become part of the business's self worth. We need to implement changes to Ecology's program that help achieve those results.
- The program needs better cost accounting. This accounting needs to account not only for what is good for business, but also for what is good for society.
- If businesses promote the importance of green practices, employees will listen. That phenomenon needs to be factored into the new program. An emphasis on this aspect of the program could be included in addition to any recommendations regarding the fee structure.

Questions and Comments Regarding Initial Comments

- **If this is the incorrect overall approach, what approach would the Committee recommend?**

- This approach starts with chemicals, but there are over 600 chemicals. This approach is too abstract for businesses; they won't understand it and they will balk as a result. The program should be based on industry sectors instead.

Chemicals of Concern

Washington's program needs a mechanism for capturing chemicals of high concern, and then modifying the resulting list over time as the science changes. There are a number of lists emerging in addition to Washington's current list.

- It will generate a lot of negative attention if Ecology is given a blank slate to add chemicals. There needs to be a process.
- The Committee is split on whether to include pesticides in the program. Several members argued that pesticides are an important aspect of toxics use and should be included. Others argued that pesticides do not mesh well with the Committee's charges and should not be included.
- Massachusetts's concept of setting out half a dozen chemicals to target; that concept deserves thought.
 - There are benefits to having a larger list, even if the Committee doesn't take action on all of the chemicals, because it puts companies on notice that those chemicals may be addressed in the future.
- The Committee needs a way to set priorities and put a system in place to address questions they will not be able to answer. The TURA science advisory board model would provide these benefits.
- Any list should address toxicity; pounds are a poor metric to use to achieve the Committee's goals. The original charge should be interpreted to mean a desired 50% reduction in toxicity, not in quantity.
 - Toxicity may be a more important policy consideration, but businesses understand pounds and any chemical information should be in pounds when discussed with businesses or used in reporting. In addition, exposure can be just as important as toxicity.
- Several Committee members supported adopting a TURA-style science board that would determine the chemical list. Such a science board might include industry experts as well.
 - Appointing another board would mean more bureaucracy.
- Washington's lead process involved forming a committee of experts for a set time and giving them specific goals. That model might work for this process, too.
- Regardless of the mechanism for modifying a list, using existing lists as a basis for development of priorities would be more efficient than developing a new list from scratch.
- The Committee should not focus too much energy on the list, which is only an advisory list for Ecology. We should focus on how to engage the affected businesses.
- The Committee should not exclude certain chemicals from the list.

Recommendations Regarding Chemicals of Concern

- **Several Committee members support a risk based approach that would prioritize chemicals based on their toxicity.**
- **Chemicals should be added to the programs list through a formal process.**
- **Several Committee members support appointing a science advisory board that would determine the program's chemical list.**
 - Several Committee members disagreed, and recommended that the process be public.
- **The Committee agreed to use existing chemical lists, such as the TRI, the Montreal Protocol, Washington's Persistent Bioaccumulative Toxin (PBT) list, and Washington's Children's Safe Products Act list as the basis for developing Washington's list of priority chemicals, but identifying the most relevant lists will require additional discussion.**

Universe of Facilities and Chemical Thresholds

- If the focus of the program changes, the pool of businesses will change dramatically. This will require different communication approaches, a concern that should be included.
- Effectively addressing the threshold issue may not be feasible.
 - The use of thresholds would address that concern: if a chemical is on the list, it will have a quantity that would trigger participation in the program. This approach may still require a different approach for small businesses.

Recommendations Regarding the Universe of Facilities and Chemical Thresholds

- **The program should include the health care sector, and should address toxics use by consumers by targeting retailers.**
 - Several Committee members argued that including retailers is outside the scope of the Committee's charge unless the retailers are themselves generators of toxic materials.
- **Any threshold should be based on a chemical's toxicity to living organisms, not on employee numbers.**
- **The Committee needs additional information on which businesses pay the generation fee and how it is calculated.**
- **Several Committee members recommended that any new program should offer a package of incentives to promote toxics reduction by businesses.**

Strategies for Toxics Reduction

Ecology is looking to maximize businesses' flexibility in selecting the tools they use to plan for reducing toxics use while ensuring results are able to be rolled-up. .

- The concept is sound, but most businesses won't use any of these specific tools. Small businesses will require a dramatically different approach.

- Don't throw out the whole approach because it doesn't work for small businesses. The proposed concept is to maintain the existing business population, but to add a system in case small businesses are identified as using significant amounts of toxic material.
- It might make sense to collect some basic data on Washington's business population before we move to the next step.
- The problem for small businesses is mismanagement that leads to a catastrophic failure e.g. I accidentally misused a chemical.
- Some chemicals are so hazardous that Ecology may need to work with small businesses, therefore small businesses should be required to report on purchasing.
 - Any such reporting should be simple.
- Air quality reporting uses simple metrics that might serve as a model approach.
- Several members of the Committee are divided as to whether or not the Committee should address the precautionary principle.

Questions Regarding Strategies for Toxics Reduction

- **Is data available on how toxics use is divided across the state?**
 - There is not good information on toxics use by small businesses. We do know that there is a large number of small businesses in the State.

Recommendations Regarding Strategies for Toxics Reduction

- **The Committee supports the concept of offering businesses flexibility in choosing planning tools.**
- **Small business will require an alternate, streamlined approach.**
- **Reporting should be standardized.**
- **A resource center for small businesses would be a valuable addition to the program.**
- **If the precautionary principle is discussed during a TRAC meeting, the discussion scope and duration should be limited.**
- **While there was agreement that training is important, it should not be required.**

Technical Assistance

How should Ecology's technical assistance services be packaged? Should it be based in a University, or in Ecology? Should Washington adopt the TURI three-legged stool model instead? The selected approach needs to meet businesses' needs.

- Larger facilities want flexibility, but smaller facilities want targeted guidance. These small businesses want to be told what to do. This divide calls for two different programs.

- The program needs a clearinghouse on chemicals and related research, similar but not necessarily identical to the TURI library.
- There probably isn't any technical experience that Ecology can provide to Boeing. They already have the resources and technical expertise in house. However, LEAN facilitators would be an exception to this.
- These scenarios are missing local government partnerships. Building more local government capacity would be an option.
- The Committee has heard many positive reviews of the technical assistance program during the committee meetings. It seems that Ecology has convened this panel to increase the budget for this element of the program, but no market test has been produced that indicates whether or not technical assistance is providing good returns on the State's investment, or if this is an area that would benefit others with additional investment.
 - This program will require multiple approaches; some technical assistance will be necessary. Business surveys have indicated that one-on-one outreach is desired and effective.
- If technical assistance is so beneficial to businesses, why don't they invest in it themselves?
 - It usually takes a lot of pushing to get a business over the initial barriers to implementing change. Businesses also don't invest in these areas because they don't trust the consultant.
- Outreach should be multi-media. Combine topics, rather than having one staff person for each.
- TURI would be a good model to use because it provides technical assistance and is separate from the regulatory arm.
- Members disagreed as to whether a TURI-style program should be separate from Ecology or not.

Recommendations Regarding Technical Assistance

- **Ecology's suggestion to add MBAs should be changed to emphasize staff whose specialty is operations.**
- **Several Committee members agreed to pursue building additional local government partnerships.**
- **Ecology should not hire additional staff for the services proposed in the mock scenarios, but rather should contract for those services.**
- **Technical assistance is a valuable part of the program, especially for small businesses.**
- **Ecology should invest more money into business education and research.**
 - A TURI lab that could provide testing for alternative products or processes would be extremely beneficial to businesses.
- **Ecology could include a certification program for business consultants.**

- **Ecology should target industry association representatives and have them pitch the services to their members.**

Business Incentives

Ecology has envisioned a tiered approach to incentives. A baseline would be set for P2 planners, with businesses receiving additional incentives for greater reductions.

- The Canyon Creek example demonstrated that a small amount of seed money is a major benefit to a small business. The Committee should consider a revolving loan fund wherein Ecology identifies potential based on the chemical list, provides seed money to identified companies, and receives payment back into the fund as a return on the initial investment.
 - The framework for such a revolving loan fund already exists in Washington. All it requires is a funding source.
- The greatest power of an incentive is as a demonstration of an issue's importance to the government. The King County voucher program, while it provided a \$500 incentive to businesses, was primarily a success because it demonstrated government priorities.
- If there are studies on how to engage people, the Committee should consult them.
 - Face-to-face outreach and personal commitments are the best tools for getting businesses to implement changes, but incentive programs, such as Sweden's Nordic Swan, can also drive behavior change.
- Many businesses will not be able to respond to a tiered incentive system. They will need to something to get them going.
- The Committee was split on whether or not to include tax-based incentives. Some members argued that it created additional bureaucracy and would feature too many loopholes. Several members argued that tax incentives would be helpful to businesses and must be considered as a possible option.
 - Don't add any tax changes to proposed legislation without informing the Department of Revenue (DOR).

Recommendations Regarding Business Incentives

- **Several members recommended the use of a shared liability notification incentive.**
 - There was some concern that such a system would be ineffective, and would violate the barrier between technical assistance and enforcement.
- **The Committee agreed to remove the idea of a self-directed fee from any proposed plan.**
- **The item on the scenarios table – “Incorporate incentives into fee structure”—should be addressed as part of the fee discussion.**
- **The proposal of higher fees for certain chemicals should be discussed along with fees.**
- **The Committee agreed to consider tax changes as a component of a business incentive package.**

Plan Next Meeting

Ecology representatives will review the conclusions from this meeting and determine whether or not they have enough information to make revisions to the mock scenarios. If necessary, Ecology will contact Committee members to obtain additional comments.

The Committee agreed to discuss the remaining mock scenario themes during the first hour of the next meeting.

In preparation for a discussion of the program fees, Ecology will provide:

- Basic financial data on the current P2 program.
- Predictions for how shifting the focus from waste to use will affect the program's cost.
- Cost numbers on the four fee scenarios developed by Alan Durning.

In future discussions, the Committee should consider the program from a business perspective. If this program were to be implemented, what would we put on a brochure? How would we sell the product?

The next meeting of the TRAC is currently scheduled for Wednesday, September 10, 2008 at Seattle University in Seattle, Washington. The last meeting will be in October; the date is still be determined.

Summary of Decisions and Actions

Decisions

The Committee decided to:

- Explore including incentives in the final fee structure.
- Remove a self-directed business fee from consideration.
- Add chemicals to the hazardous materials list based on a science-based process.
- Not need to review the draft meeting notes before they are distributed.

Actions and Next Steps

- The Committee will discuss the remaining mock scenario themes during the first hour of the next meeting.
- The Committee will explore the use of incentives in the fee structure.
- The Committee will continue its discussion of chemical thresholds.
- Ecology will provide:
 - More detail on what tax incentives for businesses might look like.
 - Basic financial data on the current P2 program.

- Predictions for how shifting the focus from waste to use will affect the program's cost.
- Cost numbers on the four fee scenarios developed by Alan Durning.
- A model of a potential TURI-style program for the next meeting.
- Information on who pays the generation fee and how it is calculated.