

## National Partnership for Environmental Priorities: Rewarding Waste Minimization

Pollution Engineering, June 2006

by Lynn L. Bergeson

EPA seeks to reward efforts to reduce waste generation and emissions of chemicals that the agency believes are harmful. Their general strategy is to bestow public recognition and other rewards upon companies and other entities that choose to partner with the agency in a varied and growing number of partnership opportunities. This column describes one such partnership program, the National Partnership for Environmental Priorities (NPEP). This program is intended to recognize and publicly honor companies that choose to retool their operations to diminish the use or release of 31 priority chemicals.

### NPEP at a glance

The NPEP – formerly the National Waste Minimization Partnership Program – was designed to encourage “public and private organizations to form voluntary partnerships with EPA that reduce the use or release of any of 31 priority chemicals.” (See [www.epa.gov/epaoswer/hazwaste/minimize/partnership.htm](http://www.epa.gov/epaoswer/hazwaste/minimize/partnership.htm)). The program is one of many that reflect EPA’s commitment to encourage voluntary activities that benefit the environment. The name of the program was changed about two years ago to reflect the expansion in scope to address priority chemicals, whether they are used in products and processes or found in water, air or waste emissions.



### Program benefits

There are several significant benefits to joining the NPEP. To name a few, they are: public recognition for achieving voluntary reductions in the use of priority chemicals; information on each participating entity is posted on EPA’s website (noted above); each participant is invited to display an NPEP membership plaque for customers, employees, suppliers and stockholders to view; access to Web-based information, such as information on other EPA voluntary initiatives and the opportunity to see what other partners are up to; links to technical training assistance services in state and local government agencies; receive the NPEP Bulletin, issued quarterly; and be invited to submit articles.

Perhaps one of the biggest benefits, according to EPA, is the opportunity to realize significant cost savings. The agency is quick to point out that diminishing the need to purchase, process and dispose of priority chemicals often translates into cost savings. For example, listed on EPA’s website under “Success Stories” is a recent posting of Old Bridge Chemicals, a small chemical company with approximately 40 employees (visit [www.epa.gov/epaoswer/-/hazwaste/minimize/oldbridge.htm](http://www.epa.gov/epaoswer/-/hazwaste/minimize/oldbridge.htm)). As a result of certain process changes, “the annual cost of handling ... lead wastes went from \$770,896 to an estimated net income of \$836,133 in the year 2005. These changes represent an annual net gain of \$1,607,029.”

Net gains such as this do not fully reflect other cost avoidance/savings opportunities. For example, EPA noted that companies can change their status from Resource Conservation and Recovery Act (RCRA) large quantity generators to small quantity generators, or to conditionally exempt small quantity RCRA generators. This change in RCRA generator status

saves time and recordkeeping resources at the management level, as well as waste disposal costs. The agency also noted that by reducing the quantity of the priority chemicals, partners can reduce the number of workplace accidents, worker exposure, environmental liability, recordkeeping and paperwork obligations, raw material costs, and related expenses.

EPA encourages entities to partner with the agency to achieve these benefits. Public recognition in reducing the use of, and releases from, chemicals that EPA has identified as priority chemicals is reward in itself for many entities, but that recognition is difficult to garner. As noted above, however, there are also compelling business and financial rewards that should not be overlooked.

*Lynn L. Bergeson*

*Lynn L. Bergeson is a founding shareholder of Bergeson & Campbell, P.C., a Washington D.C. law firm concentrating on chemical, medical device, and diagnostic product approval and regulation, and associated business issues.*