



Ohio EPA *Tox-Minus* Initiative Implementation Strategy

September 17, 2007

INTRODUCTION

Ohio has consistently ranked as one of the top states in toxic chemical emissions since the Toxic Release Inventory (TRI) was created in 1987. *Tox-Minus* is a significant step toward a long-term goal of improving Ohio's environment by reducing TRI emissions. As a first step, Ohio EPA Director Chris Korleski is asking 100 of the top Toxic Release Inventory reporters for 2005 (see attached list) to identify, evaluate and implement feasible and effective pollution reduction or prevention strategies to reduce waste, air and water-related TRI emissions.

The initiative's name reflects a long-term goal of moving Ohio down in the TRI listings, which will help enhance our image as an environmentally proactive, yet economically competitive state.

Companies participating in *Tox-Minus* will establish their own goals for reducing TRI chemical releases. Reduction goals should cover a five-year time frame, beginning with 2007 as the base reporting year. However, companies can use a longer time frame, if necessary, to achieve meaningful chemical reductions. Participants will also outline how they plan to reduce emissions and submit this information to Ohio EPA. In addition, participants will provide annual updates on their accomplishments to Ohio EPA.

One important objective of this initiative is to publicize the exemplary emission reduction efforts being made by Ohio companies. Companies working to reduce their emissions deserve public credit. Sharing success stories, including the environmental and financial benefits of reducing emissions, can also help encourage other businesses throughout the state to explore pollution reduction or prevention opportunities.

ELIGIBLE PARTICIPANTS

Tox-Minus is initially focused on 100 of Ohio's top TRI reporters. However, any other businesses in Ohio wishing to reduce their TRI emissions are also invited to join the program.

CRITERIA AND PARTICIPATION

Tox-Minus participants are asked to provide the following information:

By October 15, 2007:

1. **Set voluntary reduction goals for Ohio facility(ies).** Ohio EPA is not setting mandatory reduction goals for companies. Each company will identify its own reduction goals for TRI chemical emissions it wishes to target. Reduction goals should begin with 2007 as the base year and cover up to a five-year time frame. Companies can use a longer time frame if necessary to achieve meaningful chemical reductions. Companies can specify reduction goals in the commitment letter (see item 2 below), or submit them within six months, along with the outline of actions that will be taken to reduce emissions.
2. **Provide Ohio EPA with a letter of commitment to participate in the program.** Participants agree to complete an initial plan outlining the steps they will take to reduce emissions. Participants also agree to provide a brief annual report on their accomplishments. Ohio EPA will not seek any business confidential or proprietary information as a part of the reporting. Success stories from Ohio companies working to reduce emissions will be based on information that can be shared publicly.
3. **Identify a facility-level contact who can serve as a point of contact for Ohio EPA to work with.** For companies with more than one facility in Ohio, there can be a contact for each Ohio facility or a single contact to represent all facilities.

By March 3, 2008:

1. **Provide Ohio EPA with a plan that outlines the steps the company will take to reduce emissions.** Please note that reduction goal(s) should be included in this information if they were not submitted as part of the original commitment letter.

Annually After March 3, 2008:

1. **Provide Ohio EPA with a written annual report on accomplishments in reducing emissions.** Ohio EPA will use this information to develop a statewide annual progress report on the success of the *Tox-Minus* initiative. You are not required to submit any confidential or proprietary information as part of your annual report. Any changes in reduction goals or new reduction goals should be included in the annual report.

A full implementation schedule with time frames for significant activities required by both Ohio EPA and *Tox-Minus* participants is included as Attachment A to this strategy.

RECOGNITION

An important aspect of *Tox-Minus* is recognizing participants for outstanding environmental projects and their contributions to reducing emissions. Ohio EPA will publicize participants' names and summarize success stories and accomplishments through an annual *Tox-Minus* progress report, media announcements and our Web site. Ohio EPA will primarily rely on data and information submitted by participants through their annual report to gauge the progress being made toward achieving reduction commitments. All *Tox-Minus* participants will receive a Certificate of Participation from Ohio EPA. Additional recognition programs may be developed during the course of the program.

ASSISTANCE AND CONTACT INFORMATION

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is available to assist companies interested in participating in *Tox-Minus*. OCAPP can provide guidance on how to set reduction goals and prepare annual progress reports. In addition, OCAPP can conduct site visits to help companies identify pollution reduction and prevention opportunities. OCAPP is a non-regulatory office of Ohio EPA with of goal of helping businesses achieve compliance and identify pollution prevention strategies. The office does NOT share information it receives with agency inspection or enforcement programs.

All information submitted for the *Tox-Minus* initiative should be sent to the address below:

Ohio EPA
Office of Compliance Assistance and Pollution Prevention
Attn: Mike Kelley
P.O. Box 1049
Columbus, OH 43216-1049
tel: (614) 644-3469, or (800) 329-7518
fax: (614) 644-2807

or e-mail it to: michael.kelley@epa.state.state.oh

Tox-Minus Web site: www.epa.state.oh.us/ocapp/tox-minus.html.

ATTACHMENT A

SUBMITTAL DEADLINES AND TIME FRAMES FOR *TOX-MINUS* PARTICIPANTS

Date	Ohio EPA Commitment	Company Commitment
September 17, 2007	<ul style="list-style-type: none"> • Send letters from Director Korleski to CEOs of top 100 Toxic Release Inventory reporters for 2004 • Announce Tox-Minus initiative via news release • Create Tox-Minus Web site 	
October 15, 2007	<ul style="list-style-type: none"> • Receive letters of commitment • Establish tracking database • Establish e-mail distribution list 	<ul style="list-style-type: none"> • Send Ohio EPA letter of commitment • Establish reduction goals (<i>Please note that reduction goals can be submitted on March 3, 2008 if not included in commitment letter</i>) • Establish facility contact
November – December, 2007	<ul style="list-style-type: none"> • Send follow-up letters to companies not responding to initial invitation • Send letters of acknowledgment to companies joining the initiative • Announce list of participants via news release • Send certificates of recognition to participating facilities • Continue to update tracking database and e-mail distribution list • Provide assistance to facilities working on description of reduction activities or establishing reduction goals 	
March 3, 2008	Continue to update tracking database and e-mail distribution list	<ul style="list-style-type: none"> • Submit outline of the steps taken to reduce emissions • Include emission reduction goal(s) in this outline if they were not submitted as part of the original commitment letter.

Date	Ohio EPA Commitment	Company Commitment
April 1, 2008	<ul style="list-style-type: none"> • Add participating facilities to Prevention Quarterly newsletter distribution list. • Begin development of case studies and success stories from Ohio facilities implementing successful pollution prevention strategies. 	
April - May, 2008	Conduct meetings and/or additional outreach to "top 100" facilities not participating in initiative	
July 1, 2008	Complete first progress report	
March 2, 2009		First annual report due
July 1, 2009	Complete annual statewide progress report	
March 1, 2010		Second annual report due
July 1, 2010	Complete annual statewide progress report	
March 1, 2011		Third annual report due
July 1, 2011	Complete annual statewide progress report	
March 1, 2012		Fourth annual report due
July 1, 2012	Complete annual statewide progress report	
March 1, 2013		Final annual report due
July 1, 2013	Complete annual statewide progress report	



Alphabetical Listing of 100 of the Top Toxic Release Inventory Reporters for 2005

This list was derived by analyzing total releases to air, land and water minus releases to Publicly Owned Treatment Works, on- and off-site energy recovery, recycling and treatment to destruction. One time releases were not included. Waste management facilities are not included due to their limited potential to reduce the waste they receive from other companies. Closed facilities have also been removed. Additional information on how this list can be obtained from the Ohio EPA Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 or (800) 329-7518.

Facility	Address	City	Zip Code
AEP - CARDINAL PLANT	306 COUNTY RD. 7 E.	BRILLIANT	43913
AEP - CONESVILLE PLANT	47201 COUNTY RD. 273	CONESVILLE	43811
AEP - GAVIN PLANT	7397 N. STATE RTE. 7	CHESHIRE	45620
AEP - MUSKINGUM RIVER PLANT	COUNTY LANE RD. 32	BEVERLY	45715
AK STEEL CORP.	1801 CRAWFORD ST.	MIDDLETOWN	45043
AK STEEL CORP. - ZANESVILLE WORKS	1724 LINDEN AVE.	ZANESVILLE	43701
AK STEEL CORP. COSHOCTON WORKS	17400 STATE RTE. 16	COSHOCTON	43812
AK STEEL CORP. MANSFIELD WORKS	913 BOWMAN ST.	MANSFIELD	44901
ALUMITECH OF CLEVELAND	4181 BRADLEY RD.	CLEVELAND	44109
AMP OHIO - RICHARD H. GORSUCH STATION	STATE RTE. 7 S.	MARIETTA	45750
APPLETON PAPERS INC.	1030 W. ALEX-BELL RD.	WEST CARROLLTON	45449
ARCHER DANIELS MIDLAND	608 FINDLAY RD.	FOSTORIA	44830
BALL METAL BEVERAGE CONTAINER CORP.	12340 TOWNSHIP RD. 99 E.	FINDLAY	45840
BP PRODS. NORTH AMERICA INC. - TOLEDO REFINERY	4001 CEDAR POINT RD.	OREGON	43616
BRUSH WELLMAN INC.	14710 W. PORTAGE RIVER S. RD.	ELMORE	43416
CARMEUSE LIME INC. MAPLE GROVE OPERATIONS	1967 W. COUNTY RD. 42	BETTSVILLE	44815
CHILLICOTHE PAPER INC.	401 S. PAINT ST.	CHILLICOTHE	45601
CINERGY - BECKJORD GENERATING STATION	757 U.S. RTE. 52	NEW RICHMOND	45157
CINERGY - MIAMI FORT GENERATING STATION	11021 BROWER RD.	NORTH BEND	45052
CINERGY - ZIMMER GENERATING STATION	1781 U.S. RTE. 52	MOSCOW	45153
CITY OF HAMILTON MUNC ELEC PLANT	960 N. THIRD ST.	HAMILTON	45011
CITY OF ORRVILLE DEPT. OF PUBLIC UTILITIES ELECTRIC DEPT.	1100 PERRY ST.	ORRVILLE	44667
CITY OF PAINESVILLE POWER PLANT	325 RICHMOND ST.	PAINESVILLE	44077
CLOW WATER SYSTEMS CO.	2266 S. 6TH ST.	COSHOCTON	43812
DAYTON POWER & LIGHT CO. O.H. HUTCHINGS STATION	9200 CHAUTAUQUA	MIAMISBURG	45342
DOW CHEMICAL USA HANGING ROCK PLANT	925 COUNTY RD. 1A	IRONTON	45638
DP&L - J.M. STUART STATION	745 U.S. 52	MANCHESTER	45144
DP&L - KILLEN STATION	14869 U.S.52	MANCHESTER	45144
DTR INDUSTRIES INC.	320 SNIDER RD.	BLUFFTON	45817
ENERGIZER BATTERY MFG. INC.	2036 BLUE KNOB RD.	MARIETTA	45750
ERAMET MARIETTA INC.	STATE RTE. 7 S.	MARIETTA	45750
FIRSTENERGY - ASHTABULA PLANT	2133 LAKE RD. E.	ASHTABULA	44004
FIRSTENERGY - BAYSHORE PLANT	4701 BAYSHORE RD.	OREGON	43616
FIRSTENERGY - EASTLAKE PLANT	10 ERIE RD.	EASTLAKE	44095
FIRSTENERGY - LAKESHORE PLANT	6800 S. MARGINAL RD.	CLEVELAND	44103
FIRSTENERGY - R. E. BURGER PLANT	57246 FERRY LANDING RD.	SHADYSIDE	43947
FIRSTENERGY - W. H. SAMMIS PLANT	STATE RTE. 7	STRATTON	43961
FORD MOTOR CO. - CLEVELAND CASTING	5600 HENRY FORD BLVD.	BROOK PARK	44142
FORD MOTOR CO. - OHIO ASSEMBLY PLANT	650 MILLER RD.	AVON LAKE	44012
FORT AMANDA SPECIALTIES LLC	1747 FORT AMANDA RD.	LIMA	45804
GFS CHEMICALS INC.	851 MCKINLEY AVE.	COLUMBUS	43222
GM LORDSTOWN COMPLEX EAST	2300 HALLOCK-YOUNG RD.	LORDSTOWN	44481
GM POWERTRAIN DEFIANCE	26427 STATE RTE. 281 E.	DEFIANCE	43512
GOODYEAR TIRE & RUBBER CO. - POWERHOUSE	200 S. MARTHA AVE.	AKRON	44309
GOODYEAR TIRE & RUBBER CO. AKRON TECHNICAL CENTER	200 S. MARTHA AVE.	AKRON	44309
GOODYEAR TIRE AND RUBBER CO.	1115 S. WAYNE ST.	SAINT MARYS	45885
GRIFFIN WHEEL CO.	3900 BIXBY RD.	GROVEPORT	43125
HONDA OF AMERICA MFG INC.	24000 HONDA PARKWAY	MARYSVILLE	43040
IMCO RECYCLING OF OHIO INC.	7335 NEWPORT RD. S.E.	UHRICHSVILLE	44683
INEOS USA LLC	1900 FORT AMANDA RD.	LIMA	45805
ISG CLEVELAND INC.	3060 EGGERS AVE.	CLEVELAND	44105
JEFFERSON INDUSTRIES CORP.	6670 STATE RTE. 29 N.E.	WEST JEFFERSON	43162

Facility	Address	City	Zip Code
JOHNS MANVILLE - DUTCH RD	7500 DUTCH RD.	WATERVILLE	43566
JOHNS MANVILLE PLANT 2	408 PERRY ST.	DEFIANCE	43512
JOHNS MANVILLE PLANT 8	925 CARPENTER RD.	DEFIANCE	43512
KRATON POLYMERS U.S. LLC	2419 STATE RTE. 618	BELPRE	45714
KYGER CREEK STATION	5758 STATE RTE. 7 N.	CHESHIRE	45620
LANXESS CORP.	356 THREE RIVERS PARKWAY	ADDYSTON	45001
LINCOLN ELECTRIC CO.	22801 ST. CLAIR AVE.	EUCLID	44117
LINCOLN ELECTRIC CO.	6500 HEISLEY RD.	MENTOR	44060
METAL CONTAINER CORP.	350 MCCORMICK BLVD.	COLUMBUS	43213
MIDWEST ELASTOMERS INC.	700 INDUSTRIAL DR.	WAPAKONETA	45895
MILLENNIUM INORGANIC CHEMICALS- A LYONDELL CO.	2426 MIDDLE RD.	ASHTABULA	44004
MILLENNIUM INORGANIC CHEMICALS- A LYONDELL CO.	2900 MIDDLE RD.	ASHTABULA	44004
MILLER BREWERIES EAST INC.	2525 WAYNE MADISON RD.	TRENTON	45067
MSC WALBRIDGE COATINGS INC.	30610 E. BROADWAY	WALBRIDGE	43465
NORCOLD INC.	600 S. KUTHER RD.	SIDNEY	45365
OHIO BRASS CO.	8711 WADSWORTH RD.	WADSWORTH	44281
OHIO FRESH EGGS - LAYER SITE 1	11995 CROTON RD.	CROTON	43013
OHIO FRESH EGGS - LS5	20449 COUNTY RD. 245	MT. VICTORY	43340
OHIO FRESH EGGS - LS6	20613 TOWNSHIP HIGHWAY 103	HARPSTER	43323
OHIO GALVANIZING CORP.	467 W. FAIRGROUND ST.	MARION	43302
OWENS CORNING	400 CASE AVE.	NEWARK	43058
OWENS CORNING TALLMADGE PLANT	170 SOUTH AVE.	TALLMADGE	44278
PCS NITROGEN OF OHIO LP	1900 FORT AMANDA RD.	LIMA	45802
PREMCO REFINING INC. - LIMA REFINERY	1150 S. METCALF ST.	LIMA	45804
PREMIX	RT. 20 & HARMON RD.	NORTH KINGSVILLE	44068
RELIANT ENERGY - AVON LAKE POWER PLANT	33570 LAKE RD.	AVON LAKE	44012
RELIANT ENERGY - NILES POWER PLANT	1047 BELMONT AVE.	NILES	44446
REPUBLIC ENGINEERED PRODS. INC. - CANTON FACILITY	2633 EIGHTH ST. N.E.	CANTON	44704
REPUBLIC ENGINEERED PRODS. INC. LORAIN	1807 E. 28TH ST.	LORAIN	44055
REXAM BEVERAGE CAN CO.	2145 CEDAR	FREMONT	43420
REXAM BEVERAGE CAN CO.	10444 WATERVILLE	WHITEHOUSE	43571
SCOTTS CO.	14512 SCOTTSLAWN RD.	MARYSVILLE	43041
SMART PAPERS LLC	601 N. B ST.	HAMILTON	45013
SMURFIT-STONE CONTAINER ENTERPRISES INC.	500 N. 4TH ST.	COSHOCTON	43812
SOLAE LLC	605 GOODRICH RD.	BELLEVUE	44811
SOLVAY ADVANCED POLYMERS LLC	17005 STATE RTE. 7	MARIETTA	45750
SPECTRUM METAL FINISHING INC.	535 BEV RD.	YOUNGSTOWN	44512
SUNOCO INC. (R&M) HAVERHILL PL ANT	1019 HAVERHILL-OHIO FURNACE RD.	HAVERHILL	45636
THYSSENKRUPP BUDD CO. - VAN WERT	1276 INDUSTRIAL AVE.	VAN WERT	45891
TIMKEN CO. - FAIRCREST STEEL PLANT	4511 FAIRCREST ST. S.W.	CANTON	44706
TIMKEN CO. HARRISON STEEL	HARRISON AVE. S.W.	CANTON	44706
TRW AUTOMOTIVE FAYETTE PLANT	705 N. FAYETTE ST.	FAYETTE	43521
UNITED STATES CERAMIC TILE CO.	10233 SANDYVILLE RD. S.E.	EAST SPARTA	44626
V&M STAR	2669 MARTIN LUTHER KING JR. BLVD.	YOUNGSTOWN	44510
WCI STEEL INC.	1040 PINE AVE. S.E.	WARREN	44483
WHEELING-PITTSBURGH STEEL CORP. - MARTINS FERRY PLANT	1001 MAIN ST.	MARTINS FERRY	43935
WHEELING-PITTSBURGH STEEL CORP. MINGO JUNCTION	MCLISTER AVE.	MINGO JUNCTION	43938
WHIRLPOOL CORP.	1300 MARION-AGOSTA RD.	MARION	43302