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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
THE ADMINISTRATOR

MEMORANDUM

SUBJECT: EPA Definition of "Pollution Prevention"

FROM: F. Henry Habicht II
Deputy Administrator

TO: All EPA Personnel

EPA is seeking to integrate pollution prevention as an ethic throughout its activities, in accordance with the national policy expressed in the Pollution Prevention Act of 1990. Your individual efforts to push development of new opportunities, approaches, and processes to prevent pollution are impressive and exciting.

While the concept of pollution prevention is broadly applicable--a tool to accomplish many environmental tasks--this memo attempts to guide more consistent use of the term in our activities and written materials. Pollution prevention requires a cultural change--one which encourages more anticipation and internalizing of real environmental costs by those who may generate pollution, and which requires EPA to build a new relationship with all of our constituents to find the most cost-effective means to achieve those goals.

The following EPA "Statement of Definition" is a formal embodiment of what has been the Agency's working definition of pollution prevention, and is consistent with the Pollution Prevention Act of 1990 and the Agency's 1991 Pollution Prevention Strategy. It makes clear that prevention is our first priority within an environmental management hierarchy that includes: 1) prevention, 2) recycling, 3) treatment, and 4) disposal or release.

While it is subject to further refinement, this definition should provide a common reference point for all of us. As you review and apply the definition in your work, please keep the following points in mind:

* As always, whether the pollution prevention option is selected in any given situation will depend on the

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requirements of applicable law, the level of risk reduction that can be achieved, and the cost-effectiveness of that option.

* Accordingly, the hierarchy should be viewed as establishing a set of preferences, rather than an absolute judgement that prevention is always the most desirable option. The hierarchy is applied to many different kinds of circumstances that will require judgement calls.

* Drawing an absolute line between prevention and recycling can be difficult. "Prevention" includes what is commonly called "in-process recycling," but not "out-of-process recycling." Recycling conducted in an environmentally sound manner shares many of the advantages of prevention, e.g. energy and resource conservation, and reducing the need for end-of-pipe treatment or waste containment.

As EPA looks at the "big picture" in setting strategic directions for the decade ahead, it is clear that prevention is key to solving the problems that all our media programs face, including the increasing cost of treatment and cleanup. In the common-sense words of Benjamin Franklin, "an ounce of prevention is worth a pound of cure."

Please use the Statement of Definition of Pollution Prevention in all

of your EPA activities.

POLLUTION PREVENTION: EPA STATEMENT OF DEFINITION
(pursuant to the Pollution Prevention Act of 1990
and the Pollution Prevention Strategy)

Under Section 6602(b) of the Pollution Prevention Act of 1990, Congress established a national policy that:

- * pollution should be prevented or reduced at the source whenever feasible;
- * pollution that cannot be prevented should be recycled in an environmentally safe manner whenever feasible;
- * pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and
- * disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.

Pollution prevention means "source reduction," as defined under the Pollution Prevention Act, and other practices that reduce or eliminate the creation of pollutants through:

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- increased efficiency in the use of raw materials, energy, water, or other resources, or
- protection of natural resources by conservation.

The Pollution Prevention Act defines "source reduction" to mean any practice which:

- reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, or disposal; and
- reduces the hazards to public health and the environment associated with the release of such substances, pollutants, or contaminants.

The term includes: equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control.

Under the Pollution Prevention Act, recycling, energy recovery, treatment, and disposal are not included within the definition of pollution prevention. Some practices commonly described as "in-process recycling" may qualify as pollution prevention. Recycling that is conducted in an environmentally sound manner shares many of the advantages of prevention--it can reduce the need for treatment or disposal, and conserve energy and resources.

Pollution prevention approaches can be applied to all pollution-generating activity, including those found in the energy, agriculture, Federal, consumer, as well as industrial sectors. The impairment of wetlands, ground water sources, and other critical resources constitutes pollution, and prevention practices may be essential for preserving these resources. These practices may include conservation techniques and changes in management practices to prevent harm to sensitive ecosystems. Pollution prevention does not include practices that create new risks of concern.

In the agricultural sector, pollution prevention approaches include:

- reducing the use of water and chemical inputs;
- adoption of less environmentally harmful pesticides or cultivation of crop strains with natural resistance to pests; and
- protection of sensitive areas.

In the energy sector, pollution prevention can reduce environmental damages from extraction, processing, transport, and

combustion of fuels. Pollution prevention approaches include:

- increasing efficiency in energy use;
- substituting environmentally benign fuel sources; and
- design changes that reduce the demand for energy.

For more information contact:

- the Pollution Prevention Policy Staff (260-8621), or
- the Pollution Prevention Division, Office of Pollution Prevention and
Toxics (260-3557)