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County of San Diego
Department of Environmental Health
Pollution Prevention Program
P.O. Box 85261 ♦ San Diego, CA ♦ 92186-5261
(619) 338-2215 ♦ fax (619) 338-2848

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Regulatory Reinvention Pilot Projects
XL Community Pilot Project, FRL-5322-9
Water Docket, Mail Code 4101
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

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Dear Team Leader;

This is a complete packet of the San Diego County Community XL Program proposal. As you may know, there have been revisions to the project, and new sections have been added at your request. This document contains all of the revised information as well as a complete set of appendices.

I recommend that as a means to minimize confusion, the previous proposals and separate amendments are properly recycled. This should be the only document that you need!

Thank you for your assistance. If you have further questions, you are welcome to call me at (619) 338-2215.

Sincerely,



LINDA GIANNELLI PRATT, Program Coordinator
Pollution Prevention Program

"We have not inherited the Earth from our parents, we are borrowing it from our children."

38 pp

San Diego Community XL Project Proposal

December 10, 1996

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Respectfully Submitted By:

County of San Diego
Department of Environmental Health
Community Services and Planning Division
Pollution Prevention Program
P.O. Box 85261, San Diego, CA 92186-5261

Project Coordinator: Linda Giannelli Pratt
Phone: (619) 338-2215 Fax: (619) 338-2848

December 10, 1996

San Diego XL Community Project Proposal

EXECUTIVE SUMMARY

Environmental regulation of San Diego Bay is subject to several well-characterized, but common problems; overlapping regulatory programs, cumbersome reporting requirements, underutilization of available resources and funding, and under involvement of residential communities. Finding answers to these problems is a challenging task that cannot alone be addressed by narrowly focused technical assistance and community outreach efforts. Instead, a broader view is necessary. The San Diego XL incorporates such an approach by integrating programs, services and issues of the public and private sector into a concerted strategy.

The project will be modeled in a prominent "industrial park" setting that includes a significant number of commercial and industrial facilities leasing land from the Port of San Diego, as well as the surrounding residential community. This project improves on existing efforts by moving upward on the environmental management hierarchy toward the use of pollution prevention as a primary front-line strategy. Unlike conventional approaches which focus on managing wastes after they are produced, *pollution prevention* avoids waste generation by stressing more efficient in-process use of materials and conservation of resources. Building on the strength of an established network of Port tenants, and the success of past programs, the San Diego XL will address the following five major goals for sectors targeted in the San Diego Bay watershed area.

- (1) To increase the efficiency of materials and resource use.
- (2) To reduce overall pollutant emissions and hazardous waste generation.
- (3) To increase agency use of, and public accessibility to, key environmental data and information.
- (4) To provide business and community outreach on pollution prevention issues.
- (5) To decrease regulatory burden and environmental management costs.

Project goals will be achieved using specific, targeted management strategies that assemble the best existing public and private sector programs. Examples of these activities include pollution prevention and resource conservation audits, business and community outreach, integration of pollution prevention principles into public policy and lease agreements, establishment of a centralized repository of key environmental data, and the establishment of a Pollution Prevention Index for the region and selected establishments.

A key component of the Community XL Program is the regulatory flexibility needed for participating facilities and businesses. Regulatory flexibility will be needed in three key areas, (1) pollution prevention reporting requirements, (2) air emissions reporting requirements, and (3) recycling of common waste streams.

Benefits to the economic and environmental quality of the businesses and adjacent communities surrounding San Diego Bay will initially be achieved through the utilization of these services and activities. Beyond these steps, the momentum to develop and support effective environmental solutions must be maintained through continued stakeholder commitment. It will be necessary to establish and maintain ongoing communication with well-recognized state and national organizations as a means of keeping a broad base of interested parties involved with the project.

I. INTRODUCTION

Background. As with other coastal and estuarine areas throughout the United States, environmental regulation of San Diego Bay is subject to several well-characterized, but common problems; overlapping regulatory programs, cumbersome reporting requirements, underutilization of available resources and funding, and under involvement of residential communities. In spite of how often these problems occur, most are infrequently addressed, resulting in shortsighted environmental management that maintains the status quo rather than developing innovative solutions. Finding answers to these problems is a challenging task that cannot alone be addressed by narrowly focused technical assistance and community outreach efforts. Instead, a broader view is necessary. The San Diego XL incorporates such an approach by integrating programs, services and issues of the public and private sector into a concerted strategy. The project will be modeled in a prominent "industrial park" setting that includes a significant number of commercial and industrial facilities leasing land from the Port of San Diego, as well as the surrounding residential community.

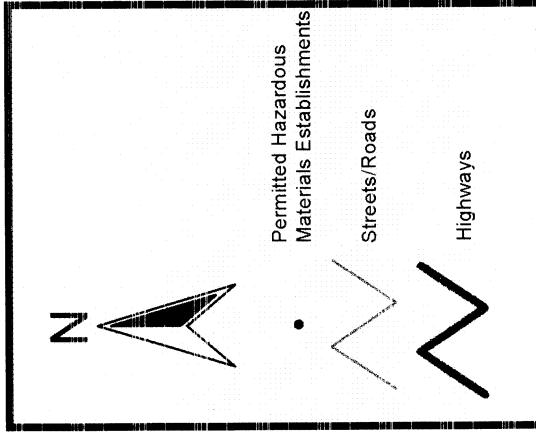
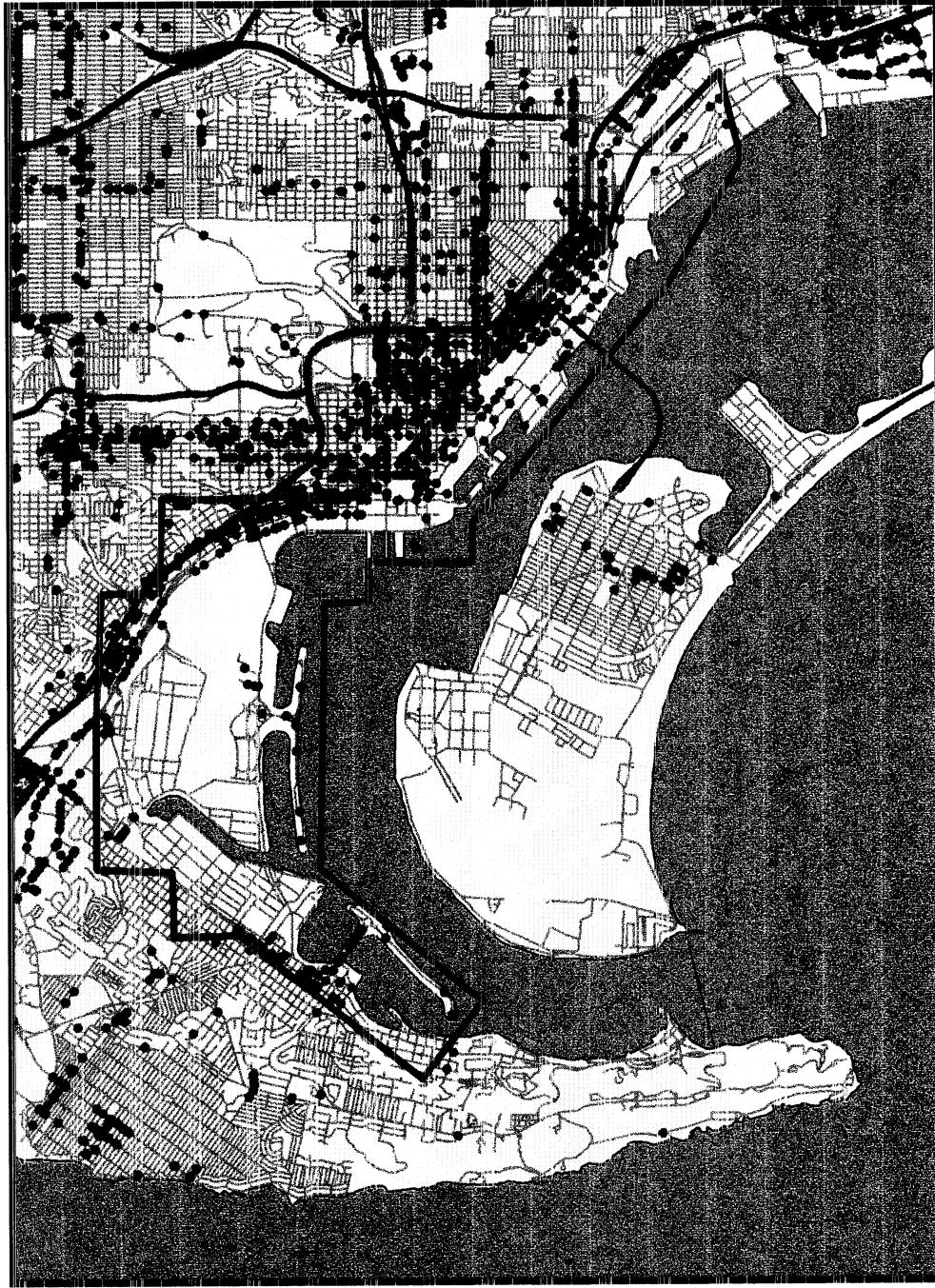
The San Diego Community XL Project affords an opportunity to shift environmental regulation of San Diego Bay businesses and industries away from end-of pipe strategies (e.g. discharge permit compliance, measurement of facility emissions and waste generation, etc.) toward a greater emphasis of pollution prevention as a primary means of achieving environmental gains. Although traditional management strategies have provided important benefits, the Community XL Project will improve on these efforts by moving upward on the environmental management hierarchy. Unlike conventional approaches which focus on managing wastes after they are produced, *pollution prevention* avoids waste generation by stressing more efficient in-process use of materials and conservation of resources. This includes both operational (material substitution, process modification, product substitution), and administrative improvements (true cost accounting of materials used and waste disposed, better coordination between procurement and operations). In elevating pollution to a first-line strategy, economic gains are also maximized, greatly increasing participation by bay businesses. To simultaneously achieve these goals, a course of action will be developed which is mutually agreeable to regulatory agencies and participating facilities.

Target Area and Populations. The geographic area included in this project includes residential, commercial, and industrial regions bordering and tributary to San Diego Bay. San Diego Bay is a crescent-shaped water body that extends approximately 15 miles from Point Loma to the mouth of the Otay River 5 miles north of the United States-Mexico international border. The bay and its watershed lie entirely within the County of San Diego, and includes portions of five cities; San Diego, Coronado, Chula Vista, National City and Imperial Beach. Approximately 20% of the bay's tidelands are occupied by military installations and housing. For this project, only areas within the City of San Diego (Figure 1) are included, but results will be applicable to other cities in the future. The business community within this region is very diverse, ranging from small businesses and marinas to large shipbuilding and manufacturing facilities. Those specifically targeted for this project will include the hotel industry and a number of other commercial and industrial facilities.

Residential communities around the bay and its watershed are also very diverse, and include a wide variety of ethnicities and socioeconomic classes. The community education component of this project will focus on the Barrio Logan, a residential district in the central bay. A large portion of this population is Hispanic, adding an important element of diversity to community education efforts, since English may not always be well understood.

Overall coordination of the San Diego Community XL Project will be provided by the County Department of Environmental Health's (DEH) Pollution Prevention Program. The project will incorporate a number of diverse elements to increase the emphasis of pollution prevention measures as a first line management strategy for San Diego Bay.

Figure 1: Approximate Boundaries of Project Area



1 0 1 2 3 4 Miles

QUANTIFIABLE OBJECTIVES

The San Diego XL is designed as a strategic environmental management system which can improve performance and utilization of resources at a lower transaction cost. The basic premise under which these activities will occur is the continuous cycle of *Plan* → *Do* → *Check* → *Act* → ... Qualitative measures of the Project's success are outlined in **Section V: MEASURES OF PROGRAM SUCCESS** (page 7). The quantitative targets of the resource conservation, environmental and economic gains are presented in the following matrix. The current status of water and energy conservation, as well as recycling, are not included in this matrix because the baseline measure is not readily available.

STATUS QUO vs. "BEYOND COMPLIANCE": Media- Specific Programs

Indicators	Status Quo	San Diego XL
HAZARDOUS WASTE ◆ Hazardous Waste Permits	approx. 250	approx. 200 <i>potential reduction due to small quantity generators switching to non-hazardous materials</i>
◆ Average cost per permit	avg. \$ 500; \$ 160 + \$ 60 per waste stream and \$55 per discloseable hazardous material	avg. \$ 250 <i>permit fees are based on the number of waste streams and the number of reportable hazardous materials stored on site.</i>
◆ Hazardous waste generated	16 million kg. per year	10 million kg. per year <i>anticipate a 35 % reduction in hazardous waste the first year of the project</i>
AIR EMISSIONS ◆ Air District Permit	approx. 70	approx. 70
◆ Average cost per permit	\$ 300 + \$60/ton for pollutants which have a national ambient air quality standard	\$ 300 <i>potential reduction in permit fees based on decreased air emissions</i>
◆ Air emissions generated		<i>parts cleaning and surface preparation constitute about 10-20 % of the waste from industrial surface coating operations, and potentially 50% of the air emissions created from these operations could be reduced</i>
INDUSTRIAL WASTE ◆ Industrial Waste Permits	approx. 73	approx. 60 <i>potential reduction due to small quantity generators switching to non-hazardous materials</i>
◆ Average cost per permit	avg. \$ 400, based on category of business and volume (gal/day) discharged	avg. \$ 300 <i>anticipate a 20% reduction in industrial waste the first year of the project</i>

**Table 1. San Diego Community XL Project
Program Elements Summarized by Target Sector**

TARGET SECTOR	PROGRAM AREA						REQUESTED REGULATORY FLEXIBILITY		
	Resource, Materials, & Waste Audits		P2 Facility Audits	Data Management	Education/Outreach	Streamline P2 Reporting	Reduce Air Emission Reporting Reqs	Consolidate Recyclable Waste Streams	
	Water Use	Energy Use	Solid Waste						
Hotel Industry	X	X	X	X	X			X	
Other Commercial & Industrial Port Tenants	X	X	X	X	X		X	X	
< 100 employees	X	X	X	X	X		X	X	
> 100 employees	X	X	X	X	X		X	X	
Barrio Logan Community									

II. PROJECT GOALS

Building on the strength of an established network of Port tenants, and the success of past programs, the San Diego XL will address the following five major goals for sectors targeted in the San Diego Bay watershed area.

- (1) To increase the efficiency of materials and resource use.
- (2) To reduce overall pollutant emissions and hazardous waste generation.
- (3) To increase agency use of, and public accessibility to, key environmental data and information.
- (4) To provide business and community outreach on pollution prevention issues.
- (5) To decrease regulatory burden and environmental management costs.

Each of these goals and the specific sectors to which each is targeted is described further below.

III. MANAGEMENT STRATEGIES

San Diego XL Project goals will be achieved using specific, targeted management strategies that assemble the best existing public and private sector programs. Benefits to the economic and environmental quality of the businesses and adjacent communities surrounding San Diego Bay will initially be achieved through the utilization of these services. Beyond these steps, the momentum to develop and support effective environmental solutions must be maintained through continued stakeholder commitment. It will be necessary to establish and maintain ongoing communication with well-recognized state and national organizations as a means of keeping a broad base of interested parties involved with the project. Specific management strategies are described below. Major program activities and the sectors to which each apply are also summarized in Table 1.

(1) **Materials and resource utilization (non-hazardous substances).**

Strategy: Conduct audits of water and energy use, and of solid waste and recyclable waste streams. All of the sectors targeted in the XL Project will be subject to a series of facility pollution prevention and resource conservation audits to include water use, energy use, and solid waste generation and recycling. Providing this combination of services to facilities will offer an opportunity to improve their overall ecoefficiency, while simultaneously yielding cost savings. Services will be provided by a variety of agencies and organizations. Each of these is described in Attachment A.

Strategy: Design a vendor certification program that is supported and utilized by the majority of Port tenants. Guidelines will be developed to help facilities increase their ecoefficiency by using only vendors and services which meet minimum criteria. By encouraging the use of outside contractors and other support services which are ecologically sound, impacts of the XL will be maximized and may also be extended beyond the limits of the immediate project area.

(2) **Pollutant emissions and hazardous waste generation.**

Strategy: Conduct hazardous materials pollution prevention audits at selected facilities. On-site pollution prevention audits will be conducted at selected larger facilities (e.g. commercial facilities with > 100 employees) to increase the use of in-process pollution prevention measures. These audits will be provided by the County Department of Environmental Health's (DEH) Pollution Prevention Program at a minimum of 20 businesses.

Strategy: Integrate pollution prevention principles into public policy and lease agreements. Reductions in overall pollutant and waste generation will also be pursued through administrative means. For example, the San Diego Unified Port District (Port), which serves as common landlord

for approximately 600 tenants, provides a unifying framework to evaluate the cumulative environmental impact of a community of companies, and more importantly to implement XL program components over a wide range of facilities. With the approval of the Board of Port Commissioners, there may be an opportunity to integrate XL components into new, amended or renewed leases. Similar strategies might also be pursued through other public policy amendments such as the addition of a pollution prevention policy to the Water Quality Control Plan for the San Diego Region. The use of administrative mechanisms has a distinct advantage over other approaches in that changes can easily be made to include all of the sectors targeted in this project.

(3) **Environmental data management and dissemination.**

Strategy: Establish an accessible, centralized repository of key environmental data. This project component will focus on the development of a model integrated database for the management and dissemination of key data and information. Environmental parameters and an appropriate forum for dissemination will be determined in consultation with service providers, other environmental agencies, and interested stakeholders. Ideally, this system will allow for a more meaningful synthesis of environmental data, as well as a convenient access point for interested parties.

Strategy: Establish a Pollution Prevention Index for the region and selected establishments. Although many waste minimization and pollution prevention efforts have been in place for several years, their success or failure has not been adequately measured because appropriate indices have not been established. By determining an index of pollution prevention, annual progress in pollutant reductions can be measured over a regional economy. In addition to providing a means of measuring XL Program success, these indices are important because they provide quantifiable evidence that pollution prevention and increased productivity are not mutually exclusive, and that a region can strive towards economic growth while decreasing pollutant discharges. For this project, a Pollution Prevention Index will be determined for commercial facilities with > 100 employees.

(4) **Business and community outreach.**

Strategy: Conduct business outreach. In addition to the education that will necessarily occur as part of facility audits, other more focused efforts will be conducted. This will include a workshop on environmentally preferable practices for the hotel service sector, and solid waste recycling workshops for all target sectors. Quarterly forums will also be conducted to facilitate information exchange forums between businesses, local agencies and other organizations.

Strategy: Conduct community outreach. Community education must be an integral part of this project for it to succeed beyond its initial implementation period. Community education will be provided to residents of Barrio Logan, a high-density, community located within the Chollas Creek watershed, which is tributary to the central bay. These efforts will also focus on local elementary schools.

(5) **Reduction of regulatory burden and environmental management costs.**

Strategy: Coordinate recycling centers for businesses with common waste streams. Because many facilities with similar processes generate common waste streams, there are significant opportunities for cost savings if these materials can be stored and collected from a centralized point. Regulations currently prohibit establishments which are not licensed as treatment, storage, and disposal facilities (TSDFs) from accepting hazardous wastes from other businesses. Examples of waste streams which might be consolidated if regulatory flexibility were allowed include cleaning solvents and fluorescent lights. Non-hazardous, recyclable materials could also be included.

Strategy: Eliminate redundant pollution prevention reporting requirements. Through the collaborative efforts of local, state and national environmental regulatory agencies, streamlining of pollution prevention reporting will be pursued for Port tenant businesses. By eliminating the need to manage and report the same or similar information on different agency forms, time and resources can be freed up which again could be used to bolster pollution prevention efforts.

Strategy: Increase knowledge and utilization of available financial and business resources by Port tenants. Many businesses and industries around the bay are often unaware of the resources currently available to them. By providing this information to businesses, links can be strengthened between these various groups. Examples include:

- ▶ Increased utilization of an environmental technology business incubator.
- ▶ Possible establishment of a "financial resource pool" for shared investments by Port tenants in equipment, and/or other services.
- ▶ Strengthening the business-to-business mentor program between Port tenants.
- ▶ Promotion of the Border Environmental Commerce Alliance, a Port tenant, which includes the Environmental Business Cluster- an environmental business incubator designed to serve start-up companies focusing on environmental technologies.
- ▶ Financial support for Port tenants through a resource pool that provides loans for equipment, retrofitting, and services that can be shared by two or more business.

IV. REGULATORY FLEXIBILITY

A key component of the Community XL Program is the regulatory flexibility afforded to participating facilities and businesses. Regulatory flexibility will be provided in three key areas, (1) pollution prevention reporting requirements, (2) air emissions reporting requirements, and (3) recycling of common waste streams. These are proposed as a means of encouraging facilities to increase pollution prevention activities. Table 2 summarizes the regulatory flexibility proposed for this project.

Table 2. Proposed Regulatory Flexibility and Increased Environmental Benefits

Decreased Requirements	Streamlining pollution prevention reporting requirements and contingency plans Reductions in frequency of air emissions reporting requirements Consolidating recycling of common waste streams
Increased Environmental Benefits	Cooperation in coordinated pollution prevention efforts

Streamlining pollution prevention reporting requirements. Pollution prevention reporting requirements mandated under federal and state regulations (RCRA, CERCLA, CAA, CWA, SB14) currently require businesses to report similar information in a number of different formats and reports. If flexibility were granted, similar requirements could be consolidated into a single report. By eliminating the need to manage and report this information on different agency forms, time and resources can be freed up which again could be used to

bolster pollution prevention efforts. As an incentive for agencies to provide this flexibility, site visits conducted by the County Department of Environmental Health as part of this XL project could be used as a verification of compliance with pollution prevention requirements.

Reduction in Air Emissions Reporting Frequency. Flexibility in reporting requirements for emissions of air constituents (e.g. monthly vs. daily record-keeping) will also be explored. Potential reductions in these requirements as specified in Air Pollution Control District (APCD) rules will be examined as an additional means of increasing participation in pollution prevention efforts. These rules are proposed for incorporation in the federal/state implementation plan (40 CFR Part 52) for the San Diego area.

Consolidated Recycling of Common Waste Streams. Many facilities with similar processes currently generate common waste streams. Because transportation costs are proportionally higher for small volumes, there are significant opportunities for cost savings if these materials can be stored and collected in larger volumes from a centralized point. This is not currently possible because hazardous waste regulations prohibit establishments not licensed as treatment, storage, and disposal facilities (TSDFs) from accepting hazardous wastes from other businesses. If regulatory flexibility were granted, some facilities could conceivably act as collection points for specified waste streams such as cleaning solvents and fluorescent lights. Non-hazardous, recyclable materials could also be included, although regulatory flexibility would not be needed.

V. MEASURES OF PROGRAM SUCCESS

XL program elements will be evaluated using several types of measures. Quantitative measures will center on documenting cost savings and waste reductions, as well as the establishment of a Pollution Prevention Index, a comparative analysis of key environmental and economic indicators. Qualitative program measures will focus on the benefits of continuous improvements which enable stakeholders to help each other meet their goals.

(1) Materials and resource use.

- ▶ The numbers and types of facility audits conducted will be documented.
- ▶ Reductions in the quantities of materials used and waste volumes generated, and the cost savings associated with these changes, will be tracked over the period of the project.

(2) Pollutant emissions and hazardous waste generation.

- ▶ A number of measurement options, such as third party verification of best management practices, and evaluation waste volumes, will be used to quantify impacts of XL program components on facility emissions and hazardous waste generation.
- ▶ The pollution prevention and energy efficiency consultations, as well as the mentor component of the San Diego XL foster an integrated environmental management system. The extent to which this is incorporated in the administrative and operational approach of companies will be considered.
- ▶ A Pollution Prevention Index will be established to compare key environmental and economic indicators for the entire San Diego region. An additional index will be formulated to evaluate the cumulative net environmental and economic gain of specific facilities within the project area.
- ▶ The inclusion of pollution prevention principals into public policy and lease agreement guidelines is a powerful tool for institutionalizing the objectives of the San Diego XL. The process by which this is accomplished will be documented as part of the final product.

(3) Environmental data management and dissemination.

- ▶ The completion of a functioning, consolidated database to collectively store and evaluate key environmental data (e.g. volumes and types of hazardous materials and wastes, industrial discharges and air emissions generated, and quantities of energy and water used) obtained from local entities will be used as a measure of the success of this project component. The extent to which the public is aware of, and able to access, this information will also be considered.

(4) Business and Community Outreach.

- ▶ The educational outreach to the residents in the neighborhood and the business mentor program can be evaluated through the level of participation, "customer surveys" and other methods typically used in educational studies to assess both the knowledge gained through the process as well as the comfort level with the information presented.

(5) Reduction of regulatory burden and environmental management costs.

- ▶ Savings in time and resources by business resulting from reductions in record-keeping and reporting requirements will be measured.
- ▶ Savings in time and resources resulting from reductions in costs associated with waste disposal and recycling will be used to evaluate the success of the waste stream consolidation component of the project.
- ▶ The involvement with financial lending institutions to establish a "resource pool" is a valuable component of the project. The degree to which the resources are available and to which businesses are applying for assistance will be taken into account.

Appendix A:

San Diego XL Project Environmental Service Providers and Cooperating Agencies

Service Providers. Several agencies will provide direct services to facilities participating in the Community XL project. These are briefly described below.

County of San Diego Department of Environmental Health (DEH) - The mission of DEH is to serve the citizens of San Diego County through programs designed to promote health and protect the environment. The DEH Pollution Prevention Program is a cornerstone for cooperative efforts between local, state and federal agencies, community groups, trade associations, and economic development organizations. The role of DEH is to facilitate the implementation of the XL components.

County of San Diego Air Pollution Control District (APCD)- The APCD has the objective of attaining and maintaining compliance with ambient air quality standards. The primary responsibility of the APCD is to determine ongoing compliance with District air quality requirements, and to educate and assist businesses in maintaining compliance.

City of San Diego Environmental Services Department - The City of San Diego Environmental Services Department is responsible for bringing the City's waste management system into compliance with State and Federal regulations, and to promote solid waste recycling efforts within City departments as well as providing technical assistance and referral services to the public.

City of San Diego, Water Utilities Department, Water Conservation Program- This is a nationally recognized program that provides water conservation information, rebate programs, and on-site consultations for businesses and residents. The goal is to achieve permanent long-term water savings through more efficient waste uses, thereby reducing our water needs, lessening wastewater treatment needs, and reducing the possibility of inappropriate discharges into storm drains.

San Diego Gas and Electric (SDG&E) - A variety of specialized services are provided by SDG&E designed to increase the energy efficiency of businesses and households. They have developed partnerships with local industries to introduce productivity-enhancing electrotechnologies, as well as providing comprehensive energy audits. SDG&E also can facilitate assistance from the Electric Power Research Institute (EPRI) to provide a broad-range of technological support.

Environmental Health Coalition (EHC) - The EHC is the prominent environmental advocacy organization in San Diego County, and are recognized nationally for their success. For the past 15 years, they have worked within communities to provide assistance in environmental, social justice, and health and safety issues.

Naval Air Station North Island (NASNI)- NASNI is one of two bases chosen nationally to participate in the Navy Environmental Leadership Program. NASNI is a prototype to develop, test and refine initiatives for all aspects of shore station environmental programs. One of the goals is to foster resource conservation and pollution prevention, and the base commander is committed to sharing the successes with the civilian community. The Consolidated Hazardous Materials Reutilization and Inventory Management Program (CHRIMP) is an example of one of the programs which may be possible to share through a business mentor program.

Metropolitan Industrial Pretreatment Program - The Metropolitan Industrial Pretreatment Program enforces pretreatment regulations at industrial and commercial facilities to protect city workers, the sewer collection and treatment system, and the environment, and to improve opportunities for wastewater reclamation and reuse.

Cooperating Agencies. In addition to those entities described above, several stakeholders are either directly responsible for representing the interests of the bay and its tenants, or play a lead role in coordinating the components of the San Diego XL. These organizations provide added value to the program in a variety of ways, including assisting with community outreach, providing technical assistance, and working on behalf of their agencies or organizations to coordinate administration of the regulatory reinvention. Most of this collaboration is a continuation of existing coordination efforts at the local level.

Regional Water Quality Control Board (RWQCB) - The Regional Water Quality Control Board is responsible for developing and enforcing NPDES permits. Permits are typically for a duration of 5 years, and they include best management practices as well as monitoring requirements.

San Diego Unified Port District (Port) - The Port District is responsible for administering approximately 35% of the bay's tideland area. The Port District controls tideland use through the issuance of permits and lease agreements. The Port District also operates San Diego's international airport which is on the tidelands.

San Diego Port Tenants Association (PTA) - Representing the interests of the commercial and industrial tenants, the PTA has a significant role in matching the services offered by the XL to the tenants that would gain the greatest benefits. The Association will also be instrumental in evaluating policy and procedures that support sustainable economic growth within the Port's "industrial park".

San Diego Interagency Water Quality Panel (IAWQP) - The California legislature established the IAWQP to encourage communication and coordination between stakeholders who may, through their activities, directly affect San Diego Bay. The IAWQP is charged with developing a Comprehensive Monitoring Plan and Coordinated Monitoring Program. The legislation establishes the 31-member IAWQP, and is comprised of policy makers and technical advisors representing a broad range of Federal, State and local agencies, industry and commercial associations, public advocacy organizations, five cities bordering the Bay and the County of San Diego.

San Diego County Office of Trade and Business Development (OTBD) - This newly established County Office is dedicated to supporting the development of innovative business assistance programs, and is responsible for evaluating the quality of customer service provided by County Departments to businesses.

Appendix B:

Pollution Prevention Index

Background

Although waste minimization and pollution prevention efforts have been in place for several years, their success or failure has not been adequately measured, and indices of pollution prevention have not been established.

An index of pollution prevention is necessary to measure annual progress in reducing the amount of pollutants generated by a regional economy. These indices are important for those in industry and government who believe that pollution prevention and increased productivity are not mutually exclusive, and that a region can strive towards developing an economy that continues to grow while decreasing pollutant discharges.

Methodology

Hazardous waste and toxic chemical data are compared to indicators of San Diego County's manufacturing activity in order to gain an understanding of the relationship between pollutant generation and the economy. The economic indicators used included: Value of Manufactured Product (VMP), Gross Regional Product (GRP), and San Diego Gas & Electric (SDG&E) energy sales to commercial and industrial customers. To evaluate the relationship between the variables, a simple statistical analysis was conducted to determine the correlation of the selected variables.

The variables, expressed as a ratio of the quantity of pollutant discharged per unit of economic activity are presented as possible pollution prevention indices. These ratios are then evaluated to determine which variables should be selected as a pollution prevention index.

Pollutant Discharge Information

Hazardous Waste Information System. The Hazardous Waste Information System (HWIS) is a publicly available database that contains specific information regarding the type and quantity of hazardous waste generated throughout California. The HWIS database is created and maintained by the California Environmental Protection Agency (Cal-EPA) Department of Toxic Substances Control (DTSC) using the data provided by the hazardous waste generator on the uniform hazardous waste manifest. The manifest is a federal and state mandated document which is used as the shipping documents for hazardous waste. A copy of each manifest is sent to the DTSC, which enters the information into the HWIS.

A list of the total hazardous waste manifested from generators in San Diego County during the years 1987 through 1992 was obtained from DTSC personnel. This list was sorted by California Waste Code (CWC), which is a numbering system that corresponds to a particular waste stream. For example, waste oil and mixed oil are classified as CWC 221 while unspecified oil containing wastes are classified as CWC 223. There were a total of 82 CWC's and one category identified as unknown. The CWC's were then divided into waste groups in general accordance with the methodology used in the Southern California Waste Management Plan, Draft Regional Plan Update. For example, CWC 221 and 223 were combined to form the Waste Oil, waste group. With this method, a total of 19 waste groups were established.

Toxic Chemical Releases. Toxic chemical releases are reported on the Toxic Release Inventory (TRI). The TRI is a publicly available database that contains specific toxic chemical release and transfer information from manufacturing facilities throughout the United States. Each year, manufacturing facilities with 10 or more full-time employees that exceed the activity thresholds for chemical manufacturing, processing, or using must report their estimated releases and transfers of listed toxic chemicals on Form R. The activity thresholds are

currently established at 25,000 pounds for manufacturing and processing and 10,000 pounds for otherwise used. The TRI list for 1992 included more than 300 chemicals and 20 chemical categories.

Cal-EPA, Office of Environmental Health Hazard Assessment (OEHHA), Hazardous Materials Data Management Program, maintains the most current database of TRI releases from California manufacturers. Personnel from OEHHA provided a summary of these releases for the years 1987 through 1992.

Wastewater Discharges. Water discharges are regulated by the California Water Resources Control Board, San Diego Region (CWRCB) regulates water discharges through the National Pollutant Discharge Elimination System (NPDES) permit program. The NPDES permit is required for industrial wastewater discharges to a water body that is considered navigable by the U.S. Coast Guard, such as rivers, lakes, and oceans. An NPDES permit may be issued to an individual facility or a municipality. The largest municipality in the region that regulates wastewater discharges from manufacturing facilities is the City of San Diego Metropolitan Industrial Waste Program (IWP). The IWP operates the Point Loma Publicly Owned Treatment Works (POTW) in accordance with an NPDES permit issued by the CWRCB.

The IWP regulates approximately 1,500 industrial sources through an industrial wastewater pretreatment program. As part of the pretreatment program, IWP personnel conduct facility inspections, issue permits, and conduct wastewater discharge monitoring activities. During inspections, good housekeeping practices and waste minimization techniques are also discussed with facility personnel. These techniques, which include waste segregation, installation of drag-out tanks, spray rinses, flow restrictors/interrupters, spill prevention plans, and toxic organic chemicals and solvent management procedures, are implemented to reduce water usage and toxic chemical discharges. The total metal loadings in industrial effluent were evaluated. These metals included cadmium, chromium, copper, lead, nickel, and zinc.

Air Emissions. Air emissions from industrial and other non-mobile sources in San Diego County are regulated by the San Diego County Air Pollution Control District (APCD). The APCD is a county agency under the control of the Cal-EPA, Air Resources Board (ARB). The APCD conducts annual emission inventories to quantify the emissions from stationary and mobile sources throughout the county. The inventories are based on data reported by individual sources and regional estimates prepared by the APCD. Although the inventories are prepared annually by the APCD, the ARB does not publish state wide inventories every year. Therefore, the data obtained from the ARB do not include 1988 and 1992 emissions.

For this project, only the emission estimates from stationary, industrial-type sources were used to determine annual emissions from manufacturing activities because they are the primary sources targeted for pollution prevention and are heavily regulated by the APCD. The stationary source estimates included emissions from the following: fuel combustion, solvent use, industrial processes, and miscellaneous processes as defined by the ARB. The emissions were divided into releases of seven criteria air pollutants including: total organic gases (TOG), reactive organic gases (ROG), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), particulate matter (PM), and particulate matter with an aerodynamic diameter of 10 micrometers or smaller (PM₁₀).

Economic Indicators

Regional economic indicators of manufacturing activity were used to determine whether the observed pollutant discharge trends were a result of real pollution prevention efforts, or merely the result of a downturn in manufacturing. In order to normalize pollutant discharges to a level of economic activity, economic indicators that best represented the part of the economy responsible for generating pollution were selected. Three indicators of regional productivity were selected. These included the Value of Manufactured Product (VMP), Gross Regional Product (GRP), and energy sold to commercial and industrial customers of San Diego Gas

& Electric. VMP and GRP were presented in both constant and current dollars. Current dollar values allow for inflation while constant dollar values indicate the monetary value of the indicator in terms of static dollars. For example, in years of high inflation, the current dollar values may increase even though the constant dollar value remains constant. Therefore, only constant dollar values were used in the analysis conducted for this study because quantitative values of pollution are not affected by inflation. The current dollar value is included for reference of how inflation affects the dollar value of the economic indicators.

Value of Manufactured Product. The VMP is the dollar value of San Diego's manufacturing output. Manufacturing is San Diego's largest economic sector, accounting for about 25 percent of San Diego's GRP in 1992. The VMP is based on a survey of area manufacturers, conducted by the Economic Research Bureau of the Greater San Diego Chamber of Commerce. The survey is based in part on wage and salary employment figures provided by the California Employment Development Department.

Gross Regional Product. San Diego County's GRP is the market value of all goods and services produced by labor and property in the County. The GRP is estimated by the Economic Research Bureau of the Greater San Diego Chamber of Commerce using the U.S. Department of Commerce's Bureau of Economic Analysis estimates of California's Gross State Product and total personal income for the state and county.

Energy. Energy use was selected as an economic indicator based on the assumption that increased energy use is related to increased productivity, although these two may not be directly proportional because of increases in efficiency. The amount of energy sold by SDG & E to commercial and industrial customers, defined as kilowatt hours (Kwh), can be used to perform year-to-year comparisons of energy use.

Normalizing Pollutant Discharges to Economic Activity

The variables were compared by performing a statistical analysis. This analysis, the Spearman rank correlation coefficient was used to provide a measure of the correlation between the pollutant discharge and economic variable. The Spearman rank correlation coefficient (r_s) is an ordinary correlation coefficient computed from the ranks of the variable values, rather than from the actual values. In the absence of tied values, the equation which expresses the Spearman rank correlation coefficient is:

$$r_s = 1 - \frac{6 \sum d_i^2}{n(n^2 - 1)}$$

where d_i equals the rank of for the i th observation for the first variable minus the rank for the i th observation of the second variable. Should the variables be perfectly correlated, the ranks would be the same d_i would equal zero for each year and r_s would equal 1. However, a less perfect correlation would indicate a smaller value for r_s and either a negative value if the variables are inversely related or a positive value if the variables are directly related. A negative correlation between pollutant discharges and economic activity would indicate that the variables are changing simultaneously and in opposite directions.

Establishing a Pollution Prevention Index

To determine which set of variables should be used for the pollution prevention index the variables were presented as a ratio of quantity of pollutant discharge per unit of economic activity. In this way, six possible pollution prevention indices are created and presented as year-to-year trends. These trends, representing the normalized data, are then evaluated to determine which ratio should be used as a pollution prevention index. The evaluation is based upon an interpretation of the raw data used to create the ratio, and the possible uses of the individual ratios for measuring pollution prevention.

Appendix C:

Local Agency Information

Quantitative measurements for economic and environmental gains through the San Diego Community XL Program are based, in part, on the specific permit and business data provided by local regulatory agencies. The attached information presents some of the criteria that are used by the agencies responsible for enforcing regulatory compliance with air, industrial waste, and hazardous waste. In most cases, the permit fee is based on the volume and types of waste generated by each business.



COUNTY OF SAN DIEGO
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS MANAGEMENT DIVISION
(619) 338-2222

The Hazardous Materials Management Division (HMMD) fee structure is designed to cover the cost of the inspection program. The fees are based on the number and quantity of hazardous materials and waste handled and the number of underground tanks.

The following Hazardous Materials Management permit fees are effective as of July 1, 1996.

- | | | |
|-----|--|-------|
| (A) | Operating Permit Base Fee | \$160 |
| (B) | Limited Hazardous Waste/Materials Operating Permit for businesses handling only one (1) disclosable material <u>or</u> one (1) waste stream | \$ 20 |
| (C) | Biohazardous Waste:
Business establishments generating less than 220 pounds per month (No Base Fee required) | \$ 95 |
| | Limited Quantity Hauler Exemption Fee:
Up to four (4) persons transporting waste | \$ 25 |
| | Five (5) or more persons transporting waste additional fee per person
(Maximum additional fee of \$25) | \$ 5 |
| (D) | Hazardous Waste Generator Operating Permit:
Waste oil recycled by recycling company which uses State sanctioned modified manifesting procedures (flat rate) | \$ 60 |
| | Per Waste - Less than 5 tons | \$ 60 |
| | Per Waste - 5 to 50 tons | \$135 |
| | Per Waste - Greater than 50 tons | \$240 |
| (E) | Hazardous Materials Response Plans & Inventory Operating Permit (Maximum Fee is \$1,500): | |
| | Per material less than 550 gallons, 5,000 pounds or 2,000 cubic feet of compressed gas | \$ 55 |
| | Per material 550 to 5,500 gallons, 5,000 to 50,000 pounds or 2,000 to 20,000 cubic feet of compressed gas | \$ 90 |
| | Per material greater than 5,500 gallons, 50,000 pounds or 20,000 cubic feet of compressed gas | \$165 |
| (F) | Underground Hazardous Materials Storage Operating Permit Per Tank | \$120 |
| (G) | Reinspection Fee | \$100 |

(r) AIR CONTAMINANT EMISSIONS FEE

The Air Contaminant Emissions Fee is a single, source-specific fee collected simultaneously with, and considered a part of the per unit application fee(s) from Column (1) of the fee schedules, for the first permit(s) to operate at new permitted stationary sources, and the annual renewal per unit fee(s) from Column (2) for existing permitted stationary sources, as specified in Section (h). Except as otherwise provided in this section, no air contaminant emissions fee shall be collected simultaneously with or be considered a part of the application fee for the addition of units to an existing permitted stationary source that has paid an air contaminant emissions fee as part of the most recent renewal of the current permit(s) to operate.

For the purposes of this section, the definitions in Rule 20.1 apply. This section applies to both existing and new stationary sources. For new stationary sources, the District shall determine the applicability of Subsections (1) or (2) based upon actual expected air contaminant emissions from the stationary source as estimated by the District, for the calendar year in which the permit to operate for the source is issued. If the actual expected air contaminant emissions of carbon monoxide, oxides of nitrogen, oxides of sulfur, particulate matter (PM₁₀) or volatile organic compounds equal or exceed 10 tons for that calendar year, the air contaminant emissions fee shall be based on such expected emissions. This initial fee shall continue until revised to reflect District approved emissions inventory data when such data is available for the stationary source.

(1) The owner or operator of a stationary source from which the emissions of either carbon monoxide, oxides of nitrogen, oxides of sulfur, particulate matter (PM₁₀) or volatile organic compounds equal or exceed 10 tons in the calendar year for which the most recent District approved emissions inventory data exists shall pay a source-specific annual air contaminant emissions fee. The amount of the fee shall be based on the aggregate emissions of carbon monoxide, oxides of nitrogen, oxides of sulfur, particulate matter (PM₁₀) and volatile organic compounds from the stationary source in the calendar year for which the most recent District approved emissions inventory data exists, and an air contaminant emissions fee rate of \$60 per ton.

(2) The owner or operator of a stationary source that is not subject to the source-specific annual air contaminant emissions fee prescribed in Subsection (r)(1) of this rule shall pay an annual source category emissions fee. The amount of the fee shall be as follows, based on the fee schedule that is most representative of the nature of the activities at the stationary source:

Source Category Description	Fee Schedule	Annual Emissions Fee
VOC dispensing facility - Phase I and Phase II controls required	26(a)	\$9 per dispensing nozzle
Contract service remote reservoir cleaners with 100 or more units	28(k)	\$4 per cleaning unit
Halogenated solvent dry cleaner required to have emission controls	31(a)	\$120
Industrial surface coating/adhesives applications (5 or more tons/year)	27(e)	\$300
Metal parts and aerospace coating applications (5 or more tons/year)	27(k)	\$300

11-08-1996 15:22

Source Category Description - cont'd	Fee Schedule	Annual Emissions Fee
Wood product coating applications w/o controls (5 or more tons/year)	27(m)	\$300
Automotive painting operations (applying more than 5 gallons/day)	27(s)	\$180
All other stationary sources	various	\$ 30

Where more than one source category description or fee schedule applies, and it cannot be determined which is most representative of the nature of the activities at a stationary source, the single source category description or fee schedule that results in the maximum annual emissions fee shall apply for purposes of this section.

(s) TITLE V OPERATING PERMIT FEES

The owner or operator of a stationary source for which a federal operating permit is required pursuant to Regulation XIV (Title V Operating Permits) of these Rules and Regulations shall pay a fee sufficient to recover the actual costs incurred by the Air Pollution Control District to review, evaluate and act upon applications for initial permits, permit amendments, permit modifications, permit revisions, permit reopening and permit renewals. The costs shall be determined using the application related indirect cost multiplier and labor rates specified in Schedule 94, except that the costs associated with annual permit renewals shall be determined using the permit related indirect cost multiplier and labor rates specified in Schedule 94. When required to apply for an initial Title V permit pursuant to Regulation XIV, the owner or operator of a stationary source shall pay an additional base fee of \$2200 for each stationary source, plus the cost recovery fee specified above.

The Title V operating permit fee shall be in addition to other applicable fees prescribed in this rule. The actual costs shall be the additional costs that the Air Pollution Control Officer determines are not otherwise recovered by other applicable fees prescribed in this rule. When required to submit an application for, or regarding, a Title V operating permit, the applicant shall deposit with the Air Pollution Control District the amount estimated to cover the cost of reviewing, evaluating and acting upon the application.

COMMUNITY XL PROJECT QUESTIONNAIRE
11-01-96

To assist us in providing requested information to the USEPA, please answer the following questions in as much detail as you are currently able to provide. Please fax your completed response to the Department of Environmental Health c/o Linda Pratt at 338-2848.

1. The Community XL Project includes a geographic area contained within the Zip Codes 92101, 92103, 92106, 92110, 92113, 92133, 92136, and 92140. For this area, please estimate the number of facilities that you currently have under permit, or to which your agency provides service? *see attached list*

2. Can you provide a list of these facilities on hard copy and disk (please specify the program or file format for computer disk)?
SAVED IN ASCII TEXT FILE - MIWP.LST
DISC enclosed

3. Specific to your agency's services (e.g. hazardous waste, wastewater, air, energy, water recycling, etc.), what do you feel is the best way to measure environmental gains for your targeted facilities (e.g. actual vs. target discharge goals, reduction in total or facility-specific waste volume, etc.)?
A Reduction in mass of pollutants discharged to sewer from each facility.

4. With these measurements in mind, as a general goal for the Community XL Project, what level of improvement for these facilities would you project over the period of this project (e.g. a 20% reduction in specified waste streams, etc.)?
No goal identified as part of this program.

5. To help us document potential financial benefits from participation in the Community XL Project, can you please attach an inspection fee schedule (or equivalent explanation of inspection-related fees) for your agency?
See attached for annual permit fees, no inspection fee charged.

Post-It [™] Fax Note	7671	Date	11/1	# of pages	1
To	SARA Gubbi	From	JAN VAN RYD		
Co./Dept		Co.			
Phone #	654-4129	Phone #	338-2203		
		Fax #	338-2848		

City of San Diego
 Industrial Waste Program
 Permit Fee Schedule

**Industrial Waste flows
 between:
 (Gallons per day)**

		<u>Class</u>	<u>Annual Permit Fee (\$)</u>
Up to	99	1	25
100 -	10000	1	500
10001 -	25000	1	650
25001 -	50000	1	1250
50001 -	100000	1	1500
100001	and up	1	2000
Up to	99	2	25
100 -	10000	2	275
10001 -	25000	2	500
25001 -	50000	2	600
50001 -	100000	2	1000
100001	and up	2	1200
Up to	99	3	25
100 -	10000	3	200
10001 -	25000	3	300
25001 -	50000	3	500
50001 -	100000	3	600
100001	And up	3	1000

COMMUNITY XL PROJECT QUESTIONNAIRE

11-01-96

To assist us in providing requested information to the USEPA, please answer the following questions in as much detail as you are currently able to provide. **Please fax your completed response to the Department of Environmental Health c/o Linda Pratt at 338-2848 no later than November 6, 1996.**

1. The Community XL Project includes a geographic area contained within the Zip Codes 92101, 92103, 92106, 92110, 92113, 92133, 92136, and 92140. For this area, please estimate the number of facilities that you currently have under permit, or to which your agency provides service?

Answer: 17

2. Can you provide a list of these facilities on hard copy and disk (please specify the program or file format for computer disk)?

Answer: Hard Copy

3. Specific to your agency's services (e.g. hazardous waste, wastewater, air, energy, water recycling, etc.), what do you feel is the best way to measure environmental gains for your targeted facilities (e.g. actual vs. target discharge goals, reduction in total or facility-specific waste volume, etc.)?

Answer: Reduce risk by using toxic pesticides, encouraging Intergrated Pest management and reducing the use of pesticides and of pesticide discharges in the case of methyl bromide.

4. With these measurements in mind, as a general goal for the Community XL Project, what level of improvement for these facilities would you project over the period of this project (e.g. a 20% reduction in specified waste streams, etc.) ?

Answer: 0-75%. If the San Diego Unified Port District is able to find a vender that can recycle methyl bromide instead of discharging it, 75% of the methyl bromide could be reused.

5. To help us document potential financial benefits from participation in the Community XL Project, can you please attach an inspection fee schedule (or equivalent explanation of inspection-related fees) for your agency?

Answer: Nof fees.

FAX TRANSMITTAL

of pages 1

To	Linda PRATT	From	Brooke LeBlanc
Dept./Agency	DHS/O2 Proj.	Phone #	532-2226
Fax #	338 2848	Fax #	-2288

at internet

NSN 7540-01-317-7388 5099-101 GENERAL SERVICES ADMINISTRATION

ntents -----

Subject: SAN DIEGO COMMUNITY XL PROJECT -Reply

LINDA,

MIKE MCGEE FROM NAS NORTH ISLAND SAID YOU WERE LOOKING FOR SPECIFIC GOALS TO PUT INTO YOUR PROGRAM. WE RECOMMEND THIS (FEEL FREE TO MODIFY IT):

THE NAVY, AS WHOLE, HAS SET A GOAL OF 50 PERCENT REDUCTION IN HAZARDOUS WASTE GENERATION WITH CONTINUAL IMPROVEMENT BY THE END OF CALENDAR YEAR 1999. NAS NORTH ISLAND IS DEDICATED TO DOING ITS PART TO HELP ACHIEVE THESE OVERALL GOALS

SPECIFICALLY, NAS NORTH ISLAND IS STRIVING TO ACHIEVE 50 PERCENT REDUCTION OF TOTAL RELEASES AND OFF-SITE TRANSFERS OF TOXIC RELEASE INVENTORY (TRI) REPORTED CHEMICALS BY THE END OF 1999.

NAS NORTH ISLAND AS ONE OF TWO NAVAL BASES WORLD-WIDE IS PLEASED TO INITIATE THE NAVY'S ENVIRONMENTAL LEADERSHIP PROGRAM AND AS SUCH DEVELOPS AND/OR IMPLEMENTS INNOVATIVE TREATMENT TECHNOLOGIES AND MANAGEMENT PROCEDURES THAT ADDRESS A VARIETY OF ENVIRONMENTAL CHALLENGES FACING THE NAVY. WHEN SUCCESSFUL, THE TECHNOLOGIES ARE EXPORTED DOD-WIDE. WE ARE PLEASED TO BE ASKED TO PARTICIPATE IN THE SAN DIEGO COMMUNITY XL PROJECT. IF SELECTED, WE WILL SHARE OUR SUCCESSES WITH OTHER ORGANIZATIONS IN THE COMMUNITY, TO HELP THEM ACHIEVE ENVIRONMENTAL AND COMMUNITY GOALS.

Hope this looks good to you! Regards,

BROOKE

Appendix D:

**LETTERS OF SUPPORT
for the San Diego Community XL**

CALIFORNIA STATE SENATE

STATE CAPITOL
SACRAMENTO, CA 95814
(916) 445-3952
FAX #327-2188

2550 FIFTH AVENUE, #152
SAN DIEGO, CA 92103-6691
(619) 696-6955
FAX #696-8930

INTERNET ADDRESS
senator.killea@sen.ca.gov



LUCY KILLEA
SENATOR, THIRTY-NINTH DISTRICT

January 8, 1996

Ms. Chris O'Donnell
Regulatory Reinvention Pilot Projects
XL Community Pilot Project, FRL-5322-9
Water Docket, Mail Code 4101
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Ms. O'Donnell:

I am writing in support of the San Diego Bay Community XL proposal. As the California State Senator whose district includes most of the area surrounding San Diego Bay, I have been intensely active in bay issues.

San Diego Bay stands as the single greatest resource in the County of San Diego. It concurrently serves as a wildlife estuary, major shipping and commerce center, watershed, tourist magnet, recreational resource, and cornerstone of our national defense. The community-based Excellence and Leadership initiative provides an opportunity for San Diego to design and implement a strategy for balancing environmental quality and economic concerns in the bay region. If approved, the San Diego XL would be useful for pulling together individually successful programs and services offered by local organizations and agencies.

I urge your acceptance of this proposal. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Lucy Killea".

LUCY KILLEA
Senator

LK:sjh

COMMITTEES
CHAIR, FINANCE, INVESTMENT AND
INTERNATIONAL TRADE
APPROPRIATIONS
BUSINESS AND PROFESSIONS
EDUCATION
INSURANCE
NATURAL RESOURCES AND
WILDLIFE

SUBCOMMITTEES
CHAIR, BONDED INDEBTEDNESS
AND METHODS OF FINANCING

SELECT COMMITTEES
CHAIR, SOURCE REDUCTION AND
RECYCLING MARKET DEVELOPMENT
VOTING PRACTICES AND
PROCEDURES
WOMEN IN THE WORKFORCE

COMMISSIONS
CHAIR, CORPORATE GOVERNANCE
CONSTITUTIONAL REVISION
STATE GOVERNMENT AND THE
ECONOMY
STATUS OF WOMEN

**GREG COX**SUPERVISOR, FIRST DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS

October 25, 1995

Ms. Chris O'Donnell
Team Leader - Community XL
US EPA-OPPE
MS 2111
401 M Street, SW
Washington DC, 20460

Dear Ms. O'Donnell:

As the member of the San Diego County Board of Supervisors whose district includes the entire San Diego Bay area, I would like to express my support for the community-based Excellence and Leadership (XL) initiative.

The XL initiative provides an opportunity for San Diego to design and implement a strategy for balancing environmental quality and economic growth. The San Diego XL is the catalyst that pulls together individually successful programs and services offered by local organizations and agencies. I am very pleased to support this proposal, and applaud the stakeholders. This is truly an investment in the economic and environmental health of our diverse San Diego Bay communities.

The San Diego Bay is a valuable resource to San Diego County and to the nation. It is the largest protected marine embayment on the 900-mile stretch of the Pacific Ocean coast from San Francisco to central Baja California. I share the enthusiasm of the XL stakeholders, and look forward to providing a framework which may leverage scarce resources and build upon the vast expertise of our community.

Sincerely,

A handwritten signature in cursive script that reads "Greg Cox".

GREG COX
Supervisor, First District



San Diego Port Tenants Association

1511 Marine Way
Coronado, CA 92118
Ph: (619) 435-4469 Fx: (619) 435-4916

Advancing Trade, Commerce and Tourism while Protecting the Environment

September 26, 1996

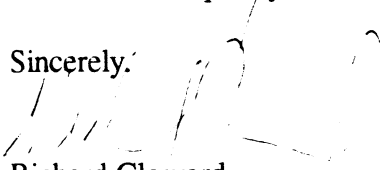
Ms. Chris O'Donnell
XL Community Pilot Project, FRL-5322-9
Water Docket, Mail Code 4101
U.S. Environmental Protection Agency
410 M Street SW
Washington, DC 20460

Dear Ms. O'Donnell:

The San Diego Port Tenants Association represents over 200 companies that lease land from the Port of San Diego. Our tenants are in all five Port cities and provide over \$48,000,000 in annual rent to the Port. Many of our tenants are directly-related marine manufacturing or repair industries and are always seeking ways to comply with regulatory requirements in an efficient and low-cost manner without compromising quality. We work hand-in-hand with the San Diego Unified Port District issue on many environmental issues and share their goal of reducing the amount of waste generated as well as stopping any inappropriate storm drain discharge. Additionally, many of our smaller companies could use assistance in just navigating the regulatory maze.

We think the community based Excellence and Leadership (XL) initiative provides an excellent opportunity for our Association members to improve their contribution to improving the region's environmental quality and are pleased to support this proposal.

Sincerely,


Richard Cloward
Executive Director
San Diego Port Tenants Association



ENVIRONMENTAL HEALTH COALITION

1717 Kettner Boulevard, Suite 100 • San Diego, CA 92101 • (619) 235-0281 • Fax (619) 232-3670
e-mail: ehcoalition@igc.apc.org • Web address: <http://www.moosenet.com/~ehc/>

March 14, 1996

Board of Directors

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Lyn Lacye
Lacye & Associates
Dan McKirnan, Ph.D.
UCSD School of Medicine
Mark Mandel
Kashi Company
Reynaldo PISAÑO
Jay Powell
Michael Shames
Utility Consumers Action Network
Norma Sullivan
San Diego Audubon Society

*Affiliations noted for identification
purposes only.*

Executive Director
Diane Takvorian

Mission Statement

Environmental Health Coalition is dedicated to the prevention and cleanup of toxic pollution threatening our health, our communities, and the environment. We promote environmental justice, monitor government and industry actions that cause pollution, educate communities about toxic hazards and toxics use reduction, and empower the public to join our cause.

Mr. William Wilson
Pollution Prevention Program (H-1-B)
EPA Region 9
75 Hawthorn Street
San Francisco, CA 94105

re: San Diego Community XL

Dear Mr. Wilson:

Environmental Health Coalition is a nonprofit environmental justice community organization working in the San Diego/Tijuana region. Since the inception of EHC in 1980, we have focused primarily on the older, lower income, people of color neighborhoods of San Diego which suffer disproportionately from toxic industrial pollution. In particular, the communities of Barrio Logan, Southeast San Diego, and west National City bear the burdens of toxic air emissions, freeway pollution, potentially dangerous concentrations of hazardous materials, and sites contaminated from past industrial uses. Residents have only limited access to San Diego Bay, which borders their communities, and use the Bay for subsistence fishing in spite of health warnings posted near the water. The small lot sizes and prevalence of building and zoning code violations exacerbate the situation.

Throughout our years of organizing work in these communities, we have heard over and over again that residents need better understanding of environmental regulations and agencies that enforce them, and better access to the agencies to ensure that adequate enforcement occurs. In several instances EHC has facilitated the communication process by bringing together residents and agency representatives at meetings; however, a more ongoing process is needed to maintain the access.

The San Diego Community XL offers an opportunity for increased attention to the environmental problems of the Bay and bayside communities. EHC is hopeful that the project will benefit both the Port tenants and the residents of these neighborhoods.

Sincerely,


Joy Williams
Community Assistance Director

cc: Linda Giannelli Pratt ✓



Port of San Diego

and Lindbergh Field Air Terminal

(619) 686-6200 • P.O. Box 488, San Diego, California 92112-0488

March 14, 1996

VIA FAX

Mr. William Wilson
Pollution Prevention Program (H-1-B)
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

RECEIVED
MAR 16 2 37 PM '96

Dear Mr. Wilson:

The San Diego Unified Port District administers granted tidelands and submerged lands around San Diego Bay. The District's goals are to promote the development of commerce, navigation, fisheries, and recreation for the Bay. Our agency strongly advocates pollution prevention resource conservation and recycling. For that reason, we are one of the significant partners in the San Diego Community XL Project.

As one of the service providers for the Port tenants, we hope to reduce the amount of waste generated by our tenants as well as reduce the possibility of inappropriate discharges into the storm drain which flows directly into San Diego Bay. We look forward to coordinating our services with the other partners, and demonstrate the many benefits of leveraging our resources through successful collaboration.

The community-based Excellence and Leadership (XL) initiative provides an opportunity for San Diego to design and implement a strategy for balancing environmental quality and economic growth. The San Diego XL is the catalyst that pulls together individually successful programs and services offered by local organizations and agencies. We are very pleased to support this proposal, and applaud the dedication of the stakeholders. This is truly an investment in the economic and environmental health of our diverse San Diego Bay communities.

If you have further questions, please call me at 619/686-6254.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Mailander".

MELISSA A. MAILANDER
Associate Environmental Management Analyst

MAM/dm

A:WAM4/W-WILSON.LTR
cc:Ralph T. Hicks, EMC

**DEPARTMENT OF THE NAVY**

COMMANDER NAVAL BASE
937 NO. HARBOR DR.
SAN DIEGO, CALIFORNIA 92132-5100

IN REPLY REFER TO:

October 4, 1996

Ms. Chris O' Donnell
Regulatory Reinvention Pilot Projects
XL Community Pilot Project, FRL-5322-9
Water Docket, Mall Code 4101
U. S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Ms. O' Donnell:

As the Environmental Programs Manager of the Office of Regional Environmental Coordination for the Navy in California, I would like to express my support of the San Diego XL Community Project proposal. A representative from my office, Ms. Brooke LeBlanc, has been meeting with Ms. Linda G. Pratt, County of San Diego, Pollution Prevention Program Coordinator, and other members of the community over the past year concerning this proposal. The Navy is very committed to Environmental Stewardship and Leadership. As such, we are currently looking to have the Naval Air Station North Island San Diego (one of two Navy Bases worldwide, to have been selected to represent the Navy in its Environmental Leadership Program (NELP)), join other community members in this environmental endeavor.

The NELP Management Team will be meeting on October 23 to discuss and vote on membership and involvement in the XL Community Project proposal, and how NAS North Island could best serve the community towards its environmental goals.

The NELP/NAS North Island vision is to serve as a test bed for new and innovative technologies and focused management, to address the full spectrum of environmental issues and export their successes throughout the Navy, and Department of Defense. Members of the Navy and NELP Management Team have met on several occasions with local, State and Federal Environmental Agency representatives to discuss sharing and exporting successful Pollution Prevention technology that will also serve to help private businesses.

I support this XL Community Program Project proposal that will pull together businesses, local organizations and agencies in a positive manner, that can only result in a win, win undertaking for the entire community. If I can be of further assistance, feel free to contact me at (619) 532-2210.

Sincerely,

A handwritten signature in cursive script that reads "Joe Ruzicska".

JOE RUZICKA

Navy Regional Environmental
Program Manager
By direction of the Commander



County of San Diego

CHIEF ADMINISTRATIVE OFFICER
(619) 531-5250
FAX: (619) 557-4060

CHIEF ADMINISTRATIVE OFFICE
1600 PACIFIC HIGHWAY, SAN DIEGO, CALIFORNIA 92101-2472

March 15, 1996

Mr. William Wilson
Pollution Prevention Program (H-1-B)
EPA Region 1X
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Wilson:

The Chief Administrative Officer's Office of Trade and Business Development is charged with assisting businesses through the regulatory process. For that reason we support the San Diego Community Excellence and Leadership XL Project.

Project XL balances environmental concerns, while fostering economic growth. It offers businesses an opportunity to combine resources and work together to address pollution concerns. It also will allow regulatory agencies to pull together successful programs and services offered by local organizations and agencies. This will allow for a coordinated effort in assisting businesses, while addressing pollution concerns.

If you have further questions, please do not hesitate to contact me at (730) 531-5171.

Sincerely,

CINDY GOMPPER-GRAVES, Ombudsperson
Office of Trade & Business Development

CGG:br



County of San Diego

DANIEL J. AVERA
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

P.O. BOX 85261, SAN DIEGO, CA 92186-5261
(619) 338-2222 FAX (619) 338-2377

March 12, 1996

Mr. William Wilson
Pollution Prevention Program (H-1-B)
EPA Region IX
75 Hawthorne St.
San Francisco, CA 94105

LETTER OF SUPPORT FOR SAN DIEGO COMMUNITY XL

Dear Mr. Wilson;

The County of San Diego Department of Environmental Health (DEH) is responsible for ensuring the protection of public health and the environment through a comprehensive enforcement program of State and federal laws and regulations. This is augmented by our commitment to community education and technical outreach programs. The DEH strongly advocates pollution prevention, resource conservation and recycling. For that reason, we have taken a leadership role in coordinating the San Diego Community XL.

The San Diego Community XL brings the programs, services and issues of the public and private sector together for the first time in a concerted approach, and will:

- improve the efficiency of material and resource use by the Port tenants;
- utilize regulatory flexibility to reduce reporting requirements in exchange for verified implementation of pollution prevention practices;
- utilize regulatory flexibility to enhance the financial benefits of recycling hazardous materials;
- maximize and promote the collective economic benefits of energy and water conservation, pesticide use reduction, and reductions in industrial waste, air emissions, storm water discharges, and hazardous waste generation;
- increase communication between environmental agencies and the residents of Barrio Logan, the most impacted "neighbor" of the Port tenants.

Mr. William Wilson - page 2

March 12, 1996

The Community Excellence and Leadership initiative provides an opportunity for San Diego to design and implement a strategy for balancing environmental quality and economic growth. I am very pleased to support this proposal and applaud the dedication of all the participants.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Avera", with a long horizontal flourish extending to the right.

DANIEL J. AVERA, Director
Department of Environmental Health

DJA/lgp



Air Pollution Control Board

Greg Cox	District 1
Dianne Jacob	District 2
Pam Slater	District 3
Ron Roberts	District 4
Bill Horn	District 5

Air Pollution Control Officer

R. J. Sommerville

September 27, 1996

Chris O'Donnell
XL Community Pilot Project, FRL-5322-9
Water Docket, Mail Code 4101
U.S. EPA
401 M Street, SW
Washington, DC 20460

SAN DIEGO COMMUNITY XL APPLICATION

The San Diego County Air Pollution Control District is the agency responsible for implementing state and federal air quality requirements in the geographic area of San Diego County.

The District participated in developing the San Diego Community XL Project application and is supportive of it because it is consistent with our efforts to partner with community stakeholders to achieve air quality goals. The District believes there is opportunity to ease certain administrative requirements (e.g. daily recordkeeping) in exchange for the pollution prevention and other air quality benefits an XL project would bring to this region. We are also supportive of the community education aspects of the project.

The District encourages EPA's approval of this application.

If you have any questions, please call me at (619) 694-3303.

RICHARD J. SMITH
Deputy Director

RJSm:nt



County of San Diego

KATHLEEN A. THUNER

AGRICULTURAL COMMISSIONER
SEALER OF WEIGHTS
AND MEASURES

DEPARTMENT OF AGRICULTURE, WEIGHTS & MEASURES
5555 Overland Ave., Bldg 3, San Diego, CA 92123-1292

AGRICULTURE
(619) 694-2739
WEIGHTS & MEASURES
(619) 694-2778
FAX
(619) 696-7046

March 15, 1996

Mr. William Wilson
Pollution Prevention Program (H-1-B)
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Wilson:

San Diego County Department of Agriculture enforces California pesticide laws and regulation in San Diego County. We are responsible for assuring that pesticides are used safely, that pesticide applicators and fieldworkers are provided protection from pesticide exposure, and that pesticides are used in a manner that does not contaminate the environment. We also promote Integrated Pest Management solutions to controlling pests. For that reason, we are one of the significant partners in the San Diego Community XL Project.

As one of the service providers for the Port tenants, we hope to reduce the use of pesticides by promoting Integrated Pest Management techniques for controlling pests in buildings and the landscape.

The community-based Excellence and Leadership (XL) initiative provides an opportunity for San Diego to design and implement a strategy for balancing environmental quality and economic growth. The San Diego (XL) is the catalyst that pulls together individually successful programs and services offered by local organizations and agencies. I am very pleased to support this proposal, and applaud the dedication of the stakeholders. This is truly an investment in economic and environmental health of our diverse San Diego Bay communities.

Sincerely,

DAWN E. NIELSEN
Deputy Agricultural Commissioner/
Sealer of Weights and Measures

DEN:mm



THE CITY OF

SAN DIEGO

ENVIRONMENTAL SERVICES DEPARTMENT • ENVIRONMENTAL PROGRAMS DIVISION
4950 MURPHY CANYON ROAD • SUITE 201 • SAN DIEGO, CA 92123 - 4325

Telephone (619) 492-5010

FAX (619) 492-5021

Richard L. Hays
Director

March 18, 1996

Mr. William Wilson
Pollution Prevention Program (H-1-B)
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Wilson,

The City of San Diego Environmental Services Department is a partner in, and strongly supports the San Diego Community XL Project application. The XL Project is closely tied to the goals and responsibilities of our Department, which are to ensure the public health and safety, the conservation of resources, and to properly manage the solid waste disposal needs of the City.

Our Department is also responsible for meeting the California State mandate (AB 939) requiring all jurisdictions to reduce the amount of waste landfilled by 50% by the year 2000. In order to meet this mandate, the City will need the assistance of the businesses and residents of San Diego. A partnership between the environmental service agencies and the communities of San Diego, as proposed by the XL Project application, will provide a unique opportunity for these groups to work together toward the common goals of waste reduction, pollution prevention, environmental quality, and economic growth.

We hope to use the XL Project as a way to educate the San Diego Bay communities about the need to reduce waste, and show them the economic benefits associated with solid waste reduction and recycling. We also look forward to working with the other service agencies, coordinating our individual programs and resources into an effective cooperative effort to improve the environmental and economic health of San Diego.

If you have any questions regarding our Department's participation in the XL Project, please contact Kip Sturdevan, Recycling Program Manager, at (619) 573-1214.

Sincerely,

Richard L. Hays
Director



DIVERSITY
BRINGS US ALL TOGETHER

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**9771 CLAIREMONT MESA BOULEVARD, SUITE B
SAN DIEGO, CA 92124-1331
TELEPHONE: (619) 467-2952
FAX: (619) 571-6972

June 6, 1996

Ms. Chris O'Donnell, Team Leader
Regulatory Reinvention Pilot Projects
XL Community Pilot Project, FRL-5322-9
Water Docket, Mail Code 4101
U.S. Environmental Protection Agency
401 M Street, SW\Washington, DC 20460

Dear Ms. O'Donnell:

The California Regional Water Quality Control Board, San Diego Region, is the state agency charged with protection of the beneficial uses of all the waters of the state within its regional boundaries. San Diego Bay is one of the most significant water bodies in our region. The Bay is used extensively for recreational, commercial and military purposes. As a result, the Board puts a major effort into programs for protection of San Diego Bay.

In conducting our regulatory programs we have recognized the advantages of pollution prevention, resource conservation and recycling. For that reason we support the San Diego Community XL Project. We have been working with representatives of the San Diego Community XL Project to determine the feasibility of working with them in regulating San Diego Bay shipyards.

The issues our regulatory programs address are common to many coastal communities. With the support of EPA, through the XL Project, I believe we can provide better protection of the beneficial uses of San Diego Bay as well as provide a framework and experience from which many other communities can evaluate their planning and coordination efforts. We can develop and enforce NPDES Permits that focus on the prevention of wastes, rather than the traditional "end-of-pipe" focus.

The community-based Excellence and Leadership (XL) initiative provides an opportunity for San Diego to design and implement a strategy for balancing environmental quality and economic growth. The San Diego XL is the catalyst that pulls together individually successful programs and services offered by local organizations and agencies. We look forward to coordinating our environmental expertise with the other XL partners and demonstrating the many benefits of leveraging our resources through successful collaboration.

If you have further questions, please call me at the number on the letterhead.

Respectively,

John H. Robertus
EXECUTIVE OFFICER

Post-It™ Fax Note	7671	Date	6/6	# of pages	1
To	Linda Pratt	From	Art Coe		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #	378-2848	Fax #			



County of San Diego

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DEPARTMENT OF AGRICULTURE, WEIGHTS & MEASURES
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(619) 694-2730
WEIGHTS & MEASURES
(619) 694-2778
FAX
(619) 688-7046

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