

Description

Promote the use of less harmful products and products that contain little or no TMDL pollutants. Alternatives exist for most product classes including chemical fertilizers, pesticides, cleaning solutions, janitorial chemicals, automotive and paint products, and consumables (batteries, fluorescent lamps).

Approach

Pattern a new program after the many established programs around the state and country. Integrate this best management practice as much as possible with existing programs at your facility.

Develop a comprehensive program based on:

- The "Precautionary Principle," which is an alternative to the "Risk Assessment" model that says it's acceptable to use a potentially harmful product until physical evidence of its harmful effects are established and deemed too costly from an environmental or public health perspective. For instance, a risk assessment approach might say it's acceptable to use a pesticide until there is direct proof of an environmental impact. The Precautionary Principle approach is used to evaluate whether a given product is safe, whether it is really necessary, and whether alternative products would perform just as well.
- Environmentally Preferable Purchasing Program to minimize the purchase of products containing hazardous ingredients used in the facility's custodial services, fleet maintenance, and facility maintenance in favor of using alternate products that pose less risk to employees and to the environment.
- Integrated Pest Management (IPM) or Less-Toxic Pesticide Program, which uses a pest management approach that minimizes the use of toxic chemicals and gets rid of pests by methods that pose a lower risk to employees, the public, and the environment.
- Energy Efficiency Program including no-cost and low-cost energy conservation and efficiency actions that can reduce both energy consumption and electricity bills, along with long-term energy efficiency investments.

Consider the following mechanisms for developing and implementing a comprehensive program:

- Policies

Objectives

- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	
Nutrients	✓
Trash	
Metals	✓
Bacteria	
Oil and Grease	✓
Organics	✓



- Procedures
 - Standard operating procedures (SOPs)
 - Purchasing guidelines and procedures
 - Bid packages (services and supplies)
- Materials
 - Preferred or approved product and supplier lists
 - Product and supplier evaluation criteria
 - Training sessions and manuals
 - Fact sheets for employees

Implement this BMP in conjunction with the Vehicle and Equipment Management fact sheets (SC20 – SC22) and SC41, Building and Grounds Maintenance.

Training

- Employees who handle potentially harmful materials in the use of safer alternatives.
- Purchasing departments should be encouraged to procure less hazardous materials and products that contain little or no harmful substances or TMDL pollutants.

Regulations

This BMP has no regulatory requirements. Existing regulations already encourage facilities to reduce the use of hazardous materials through incentives such as reduced:

- Specialized equipment storage and handling requirements,
- Storm water runoff sampling requirements,
- Training and licensing requirements, and
- Record keeping and reporting requirements.

Equipment

- There are no major equipment requirements to this BMP.

Limitations

- Alternative products may not be available, suitable, or effective in every case.

Requirements***Cost Considerations***

- The primary cost is for staff time to: 1) develop new policies and procedures and 2) educate purchasing departments and employees who handle potentially harmful materials about the availability, procurement, and use of safer alternatives.

- Some alternative products may be slightly more expensive than conventional products.

Supplemental Information

Employees and contractors / service providers can both be educated about safer alternatives by using information developed by a number of organizations including the references and resources listed below.

The following discussion provides some general information on safer alternatives. More specific information on particular hazardous materials and the available alternatives may be found in the references and resources listed below.

- Automotive products – Less toxic alternatives are not available for many automotive products, especially engine fluids. But there are alternatives to grease lubricants, car polishes, degreasers, and windshield washer solution. Refined motor oil is also available.
- Vehicle/Trailer lubrication – Fifth wheel bearings on trucks require routine lubrication. Adhesive lubricants are available to replace typical chassis grease.
- Cleaners – Vegetables-based or citrus-based soaps are available to replace petroleum-based soaps/detergents.
- Paint products – Water-based paints, wood preservatives, stains, and finishes are available.
- Pesticides – Specific alternative products or methods exist to control most insects, fungi, and weeds.
- Chemical Fertilizers – Compost and soil amendments are natural alternatives.
- Consumables – Manufacturers have either reduced or are in the process of reducing the amount of heavy metals in consumables such as batteries and fluorescent lamps. All fluorescent lamps contain mercury, however low-mercury containing lamps are now available from most hardware and lighting stores. Fluorescent lamps are also more energy efficient than the average incandescent lamp.
- Janitorial chemicals – Even biodegradable soap can harm fish and wildlife before it biodegrades. Biodegradable does not mean non-toxic. Safer products and procedures are available for floor stripping and cleaning, as well as carpet, glass, metal, and restroom cleaning and disinfecting.

Examples

There are a number of business and trade associations, and communities with effective programs. Some of the more prominent are listed below in the references and resources section.

References and Resources

Note: Many of these references provide alternative products for materials that typically are used inside and disposed to the sanitary sewer as well as alternatives to products that usually end up in the storm drain.

General Sustainable Practices and Pollution Prevention Including Pollutant-Specific Information

California Department of Toxic Substances Control (www.dtsc.ca.gov)

California Integrated Waste Management Board (www.ciwmb.ca.gov)

City of Santa Monica (www.santa-monica.org/environment)

City of Palo Alto (www.city.palo-alto.ca.us/cleanbay)

City and County of San Francisco, Department of the Environment
(www.ci.sf.ca.us/sfenvironment)

Earth 911 (www.earth911.org/master.asp)

Environmental Finance Center Region IX (www.greenstart.org/efc9)

Flex Your Power (www.flexyourpower.ca.gov)

GreenBiz.com (www.greenbiz.com)

Green Business Program (www.abag.org/bayarea/enviro/gbus/gb.html)

Pacific Industrial and Business Association (www.piba.org)

Sacramento Clean Water Business Partners (www.sacstormwater.org)

USEPA BMP fact sheet – Alternative products
(http://cfpub.epa.gov/npdes/stormwater/menuofbmps/poll_2.cfm)

USEPA Region IX Pollution Prevention Program (www.epa.gov/region09/p2)

Western Regional Pollution Prevention Network (www.westp2net.org)

Metals (mercury, copper)

National Electrical Manufacturers Association - Environment, Health and Safety
(www.nema.org)

Sustainable Conservation (www.suscon.org)

Auto Recycling Project

Brake Pad Partnership

Pesticides and Chemical Fertilizers

Bio-Integral Resource Center (www.birc.org)

California Department of Pesticide Regulation (www.cdpr.ca.gov)

University of California Statewide IPM Program (www.ipm.ucdavis.edu/default.html)

Dioxins

Bay Area Dioxins Project (<http://dioxin.abag.ca.gov/>)