

- Currently, over 1,200 facilities are monitored by the Washtenaw County Pollution Prevention Program.
- Washtenaw County was the first local government in the state - and one of the earliest in the nation - to provide oversight to local facilities that store, manufacture or use hazardous, toxic or polluting materials.

## Pollution Prevention Regulation Program (P2)

Recent events in our community, like the [Gelman 1,4-dioxane plume](#) and [Armen Cleaners vapor intrusion investigation](#), have increased the public's awareness of (and concern about) chemicals that companies use. While state and federal regulations exist that govern chemical storage and manufacturing, they generally do not involve an onsite inspection component. As a result, issues are discovered or enforced after the fact, on a complaint or incident basis. The Washtenaw County Pollution Prevention Regulation Program (P2 Program) operates under the notion of prevention, with annual reporting and regular inspections that can help to keep incidents from occurring.

Historically, environmental regulations for chemical storage and disposal were lax until the early 1980's, when awareness was raised nationally by major contamination incidents such as [Love Canal](#). Local incidences of illegal dumping and chemical leakage raised our awareness that problem sites existed in our own backyard, and that we may be in a better position to respond with a local regulation. To protect our community from hazards associated with toxic materials, the County adopted the Community Right-To-Know Regulation in 1986. This Regulation was amended and renamed the Pollution Prevention Regulation in 1992, and was last updated in 1994.

The P2 Program provides local oversight to facilities that store, manufacture or use materials that are hazardous, toxic or polluting. A wide array of businesses are part of the program, including oil change facilities, chemical manufacturers, lawn and landscaping companies, golf courses, auto repair facilities, dry cleaners and large industrial corporations. The program focuses on a combination of reporting, chemical storage, waste disposal and inspections to prevent environmental incidents.

**Reporting:** Every business in Washtenaw County that stores, uses or produces more than 5 gallons (or 40 pounds) of hazardous materials must submit a status report to the P2 Program each year. Approximately 1,200 businesses in Washtenaw County submit these reports annually. The report includes the types and quantities of hazardous materials at the facility, chemical storage locations, emergency contact information and plans for responding to emergency situations.

**Storage:** Underground storage is governed by the state. Above ground chemical storage falls under the P2 Program, which uses the best practice of secondary containment to prevent spills of liquid materials. With secondary containment, the chemical's container is stored in a spill control device, preventing any environmental contamination or human exposure when a primary container is damaged or spilled.

**Waste Disposal:** As part of the reporting requirements, the facility must indicate the intended plan for using, or ultimately removing, the hazardous substance from the facility. This ensures that chemicals are not being flushed down floor drains connected to a storm drain or creek, or being disposed of in another harmful method. In effect, the program follows the chain of custody for hazardous materials from cradle to grave.

**Inspections:** If a business stores 56 gallons or more of hazardous materials, Washtenaw County staff inspects the business to ensure the report submitted is accurate, and to determine if storage and waste disposal components are in compliance. Currently, over 825 businesses are routinely inspected. Frequency of inspection depends on the quantity of materials stored and the level of compliance achieved, and varies from once a year to once every four years.

### What is WCPH doing to address this issue?

We have worked with over 4,000 local facilities over the course of the 25+ years the regulation has been in effect. The frequency and severity of environmental incidents and complaints has reduced significantly. In addition, compliance with P2 Program requirements has increased substantially, indicating that chemicals are being handled properly.

WCPH is currently looking into updating the P2 Program policies to account for current technologies, hazards and best practices.

#### For more information:

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[www.ewashtenaw.org/p2](http://www.ewashtenaw.org/p2)