

Tennessee Pollution Prevention Partnership

8th Floor, L&C Tower
401 Church Street
Nashville, Tennessee 37243
1-800-734-3619
pollution.prevention@tn.gov



TP3 Program Criteria Overview

Prospect Level: To become a TP3 **Prospect**, an applicant submits a *TP3 Sign-up* card from the *TP3 Brochure* or on-line at the TP3 website (www.tp3.org). Your information will be entered into the TP3 database as a **Prospect** member.

Pledge Level: To advance to TP3 **Pledge**, a member submits a *TP3 Pledge Card* listing pollution prevention (P2) activities in the five areas: clean air, energy conservation, hazardous materials management/reduction, land and water conservation, and solid waste reduction. You will receive a *Pledge Certificate*.

Partner Level: To advance to TP3 **Partner**, a member will:

- Maintain Commendable Environmental Compliance for the past 3 years.
- Submit an *Environmental Policy Statement*.
- Submit the completed *Partner Permit Table*.
- Submit a *TP3 Plan* describing at least one new project for each pollution prevention area:
 1. Clean Air
 2. Energy Efficiency/Conservation
 3. Hazardous Materials Management/Reduction
 4. Land and Water Conservation
 5. Solid Waste Reduction – Reduce, Reuse, Recycle
- Choose the first project to implement from the *TP3 Plan*. A project implemented within the past 2 years may be used to attain the Partner level.
- Submit a *Success Story* on the first completed project. All success stories will be evaluated to ensure quality and completeness.

Maintaining Partner: Members choosing to remain at **Partner** will review their *TP3 Plan*, submit a *Success Story* on a new project, and submit a list of community outreach activities by April 1, every third year after achieving **Partner**. The Partner's environmental compliance will also be reviewed every three years. The completed projects, success stories, and community outreach activities will apply toward **Performer** in the future when all other **Performer** criteria are met.

Performer Level: To advance to TP3 **Performer**, the member will:

- Maintain Commendable Environmental Compliance for the past 3 years.
- Complete the four remaining new projects described in the *TP3 Plan*
- Submit a *Success Story* for each of the four new projects
- Have an Environmental Management System (EMS) in place for at least one year *(see next page)
- Submit documentation demonstrating Community Outreach, which includes:
 - ❖ sharing the Environmental Policy with the public
 - ❖ sharing significant environmental issues, goals for improvement, and performance (non-proprietary)
 - ❖ conducting activities in the community to promote pollution prevention
- Submit documentation of Mentoring another TP3 member in pollution prevention
- Receive final approval from the Performer Level Review Panel for quality assurance and credibility

Maintaining Performer: The Performer's environmental compliance will be assessed each year. At least one new project *Success Story*, and updates on continued Community Outreach and Mentoring activities, will be submitted annually. Documentation of EMS certification will be confirmed every 3 years. ISO 14001 certification will be accepted without further review. UT-CIS will evaluate all other EMS every 3 years.

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*** TP3 Criteria for Environmental Management Systems (EMS)**

An EMS is an organization's systematic tool to meet its environmental requirements and improve its overall performance. For initial **Performer** level consideration, a TP3 **Partner** member must demonstrate an EMS successfully operating for at least one year. The EMS must contain the key elements detailed below. Industry and regulated businesses, using Best Management Practices (BMPs) to address non-point source pollution, must demonstrate successful implementation and maintenance of appropriate BMPs for the previous year. Because each facility is unique, the scope and formality of its EMS items will vary according to its size, sector, and complexity. A qualifying EMS* includes the following key elements:

Policy

- Write, communicate, implement and maintain an Environmental Policy committing to:
 - Compliance with legal requirements and voluntary commitments beyond compliance
 - Prevention of pollution (pollution prevention, recycling, BMPs, proper treatment and disposal)
 - Continual improvement in environmental performance, including areas not subject to regulations
- The policy statement describes top management support of the EMS, and proclaims their commitment to pollution prevention and environmental protection.

Planning

- Establish a process to identify and review significant environmental aspects, legal requirements and voluntary commitments beyond compliance, including procedures for integrating anticipated changes to the facility's requirements.
- Establish and maintain measurable objectives and targets to meet policy commitments, legal requirements, and voluntary commitments beyond compliance, to reduce the facility's significant environmental impacts, and to meet the performance commitments made as part of the facility's participation in the TP3 program. *In setting objectives and targets, the facility should consider preventing non-compliance, preventing pollution at its source, minimizing cross-media pollutant transfers, and improving environmental performance.*
- Include the means and time frames for the completion of EMS objectives, targets, and commitments.

*Note: Environmental Management Systems, such as ISO 14001 and Responsible Care, are examples of good systems that will meet the TP3 criteria for an EMS.

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***TP3 Criteria for Environmental Management Systems (EMS) -- continued**

Implementation and Operation

- Establish roles and responsibilities for meeting EMS objectives and targets. Include top management representatives with authority and responsibility for the EMS.
- Define procedures to:
 - Achieve and maintain compliance, meet performance objectives and voluntary commitments beyond compliance.
 - Communicate relevant information regarding the EMS, including the facility's environmental performance, throughout the organization.
 - Provide appropriate incentives for personnel to meet the EMS requirements.
 - Provide for document control, including where EMS documents will be located, who will maintain them, and the process for review and revision.
- Provide general environmental training programs for all employees. Continue with specific training for those employees whose jobs and responsibilities involve activities directly related to achieving objectives and targets, compliance with legal requirements and commitments beyond compliance.
- Establish documentation of the key EMS elements.
- Manage records in an identifiable, traceable, protected system. Include equipment calibration, training records and results of audits and reviews.
- Document operation and maintenance programs for equipment and for procedures related to legal compliance and significant environmental aspects.
- Establish and maintain procedures to identify accident potential. Regularly communicate an emergency preparedness program; periodically test emergency preparedness where practicable.

Assessment and Corrective Action

- Establish and maintain documented procedures for assessing performance, preventing and detecting legal non-conformance, and other requirements of the EMS, including an established compliance audit program and an EMS audit program.
- Establish an active program for prompt, corrective action of any non-conformance with legal requirements and other EMS requirements.

Management Review

- Provide for regular, documented management review based on established objectives and targets, significant environmental aspects, legal requirements, continual improvement in environmental performance and voluntary commitments beyond compliance.

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TP3 Definitions

Commendable Environmental Compliance – A determination, following a coordinated review by the TDEC Enforcement Coordinator, TP3 Program Coordinator, and Staff TP3 Contact, that shows no significant non-compliance with federal, state, and local laws and no reportable releases to the environment. Proper notice of name change, merger, acquisition, etc., relevant to compliance reporting, will be up-to-date.

Community Outreach – Action of building a relationship based on performing projects and sharing environmental information with a member's local community to provide clarification, education, and interaction.

Environmental Aspect - Element of an organization's activities, products, or services that can interact with the environment.

Environmental Management System (EMS) – A systematic tool to meet environmental requirements and improve performance through policy, planning, operation, corrective action, and management review.

Environmental Policy Statement (EPS) – A formal, written statement that describes the member's strategy to maintain a safe workplace, prevent pollution, promote environmental education, and communicate environmental issues to the public.

Level – Status attained within the Tennessee Pollution Prevention Partnership by meeting specific criteria. Each level achieved has cumulative rewards and recognition.

Mentoring – The action of building a relationship with current or prospective TP3 members based on sharing pollution prevention information from a knowledgeable member to a learning member; especially signing new Prospects, helping them understand TP3, and assisting them and current members to advance through the levels.

New Project – A future project or a project that has been implemented but has not produced measurable results.

Performer Level Review Panel (PLRP) – A committee composed of representatives from environmental groups, industry, higher education institutions, and government agencies, whose task is to review TP3 Performer Applicants. The PLRP is a group of environmental professionals, selected from the Tennessee Pollution Prevention Roundtable, ensuring credibility and quality assurance for TP3's highest level of recognition.

Pledge Card – The tear-off, mail-in card only available in the Pledge level printed information. By submitting a *Pledge Card*, a member commits to continue positive environmental activities already in place or to begin new ones.

Pollution Prevention (P2) – Minimizing environmental impacts through source reduction and sustainable practices.

Success Story – Written documentation of a completed pollution prevention project. Acceptable *Success Stories* will include a description of the TP3 member, environmental issue being addressed, methods of implementation, cost savings, and the measured amount of pollution prevented.

Tennessee Pollution Prevention Partnership (TP3) – Tennessee's statewide network of households, schools, government agencies, organizations, businesses, and industries, working together to protect our shared environment through pollution prevention.

TP3 Plan – A document describing how a TP3 member will implement pollution prevention projects in five areas: clean air, energy conservation, hazardous materials management/reduction, land and water conservation, and solid waste reduction. The *TP3 Plan* should focus on reducing and eliminating significant environmental aspects that negatively impact the environment.