

## **POLLUTION PREVENTION PROVISIONS (P2)**

**Imation, Weatherford Oklahoma** (Printing and Publishing products for graphics arts and printing industry and Data Storage Products) - program, reporting requirements.

[Process Description](#)

Emissions Monitoring Technique

- [Monitoring](#)

- [Performance Testing](#)

- [Recordkeeping and Reporting](#)

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### **Process Description**

The Imation permit includes Pollution Prevention (P2) provisions. The language shown below is from the permit memorandum that introduces the P2 concept rather than from specific permit conditions.

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### **Memorandum, Section V**

Pollution prevention (P2) is defined as the use of materials, processes, or practices that reduce or eliminate the creation of pollutants or wastes at the source. P2 includes practices that reduce the use of energy, water, or other resources, and practices that protect natural resources through conservation or more efficient use.

To be a useful tool, P2 must be a method of operation that incorporates elements of change, measurement, flexibility, and linkage with permit conditions. Therefore, the document that outlines the facility P2 program, including but not limited to corporate commitment, performance goals, and performance measurement, will be separate from the Air Quality Permit, will be maintained on the facility site, and will be made available to regulatory personnel upon request.

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### **Emissions Monitoring Technique - Monitoring**

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#### **Section G**

1. In order to qualify for the alternative operating scenarios as described in Section H of the Specific Conditions, not more than 180 days after the date of this permit, the permittee shall commence implementation of a Pollution Prevention (P2) program. The P2 program required under this condition shall include, at a minimum, the following program elements which shall be detailed in a plan outside this permit according to the most recently dated and approved Memorandum of Understanding (MOU) between AQD and Imation Enterprises Corp. Specific results of the plan shall be made available to regulatory personnel upon request and as stated in the MOU. Since

proprietary information may be contained within the document, every eighteen (18) months from the date of the permit, an Executive Summary of the program shall be prepared by the permittee, which is sufficient to show the progress of the P-2 program at the site. [OAC 252:100-41]

- A. A statement of Corporate and Site commitment to pollution prevention.
  - B. An employee P2 awareness, education, and training program.
  - C. A P2 performance measurement calculation that will quantify the effectiveness of the program
  - D. A description of P2 performance goals for the site.
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### **Emissions Monitoring Technique – Performance Testing**

Not Applicable

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### **Emissions Monitoring Technique – Recordkeeping and Reporting**

The Imation permit includes recordkeeping procedures related to P2 provisions. The permit does not specifically include reporting procedures for the P2 program. The language shown below is from the permit memorandum.

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#### **Memorandum, Section V**

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An Executive Summary of the P2 Program will be prepared by the permittee and maintained on site and at the Air Quality headquarters office in Oklahoma City for review by the public. The Executive Summary will outline the program parameters and reflect the results of the semi-annual leadership reviews that are required by Section G, Specific Condition No. 1 of the permit.

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### **Emissions Calculation**

Not Applicable

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### **Pollutant Control Technique**

Not Applicable

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