



# 2024 National Pollution Prevention Training and Conference

## **P2 Tools for Success**

December 11, 2024

11:00AM – 12:00PM ET

**Moderated by Alizabeth Olhasso, EPA**

### **Speakers:**

- **Charlotte (Charlie) Snyder, EPA, Data Analysis and Right to Know Branch**
- **Jason Marshall, Toxics Use Reduction Institute**
- **Dr. Cris Brazil, Kansas State University**



# **POLLUTION PREVENTION AND THE TOXICS RELEASE INVENTORY**

**USING TRI TOOLS TO FIND P2 DATA**

Charlie Snyder, US EPA  
December 11, 2024

# PRESENTATION OVERVIEW

- Quick intro to TRI
- What facilities report
- Pollution prevention data
- Tools demonstration:
  - TRI Toxics Tracker
  - Solvent Substitutions
- Questions and discussion

# WHAT IS THE TRI?

TRI-listed chemicals may pose a threat to human health and the environment

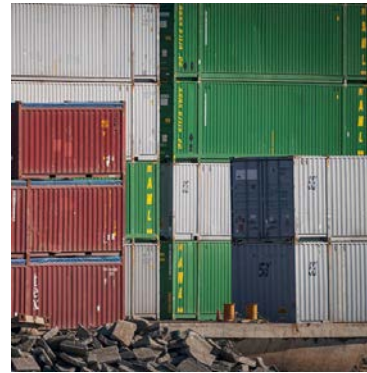
TRI tracks the management of these chemicals in waste



ENVIRONMENTAL  
RELEASES



WASTE  
MANAGEMENT



WASTE  
TRANSFERS



POLLUTION  
PREVENTION

# WHAT IS THE TRI?

**800+**

individual chemicals and  
chemical categories

**21,000+**

industrial and federal  
facilities

**SINCE 1987**

annual reporting  
directly from facilities

# WHICH FACILITIES REPORT TO TRI?

1. Facility must be in a **TRI-covered industry sector or category**, including:



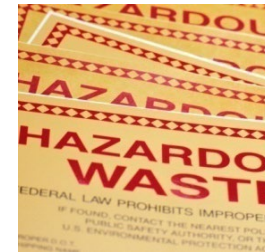
MANUFACTURING



COAL/OIL  
ELECTRICITY  
GENERATION



CERTAIN MINING  
FACILITIES



HAZARDOUS  
WASTE  
MANAGEMENT



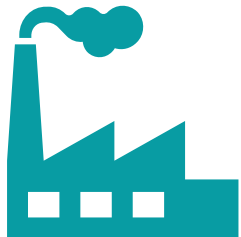
FEDERAL FACILITIES

2. Facility must have the equivalent of at least **10 full-time employees**
3. Facility must manufacture, process, or otherwise use more than a **certain threshold amount of a TRI-listed chemical within a calendar year**

# WHAT IS A RELEASE?

Releases are the different ways that chemicals from industrial facilities enter the

## AIR



Stack  
emissions



Fugitive  
emissions

## WATER



Surface water discharges

## LAND

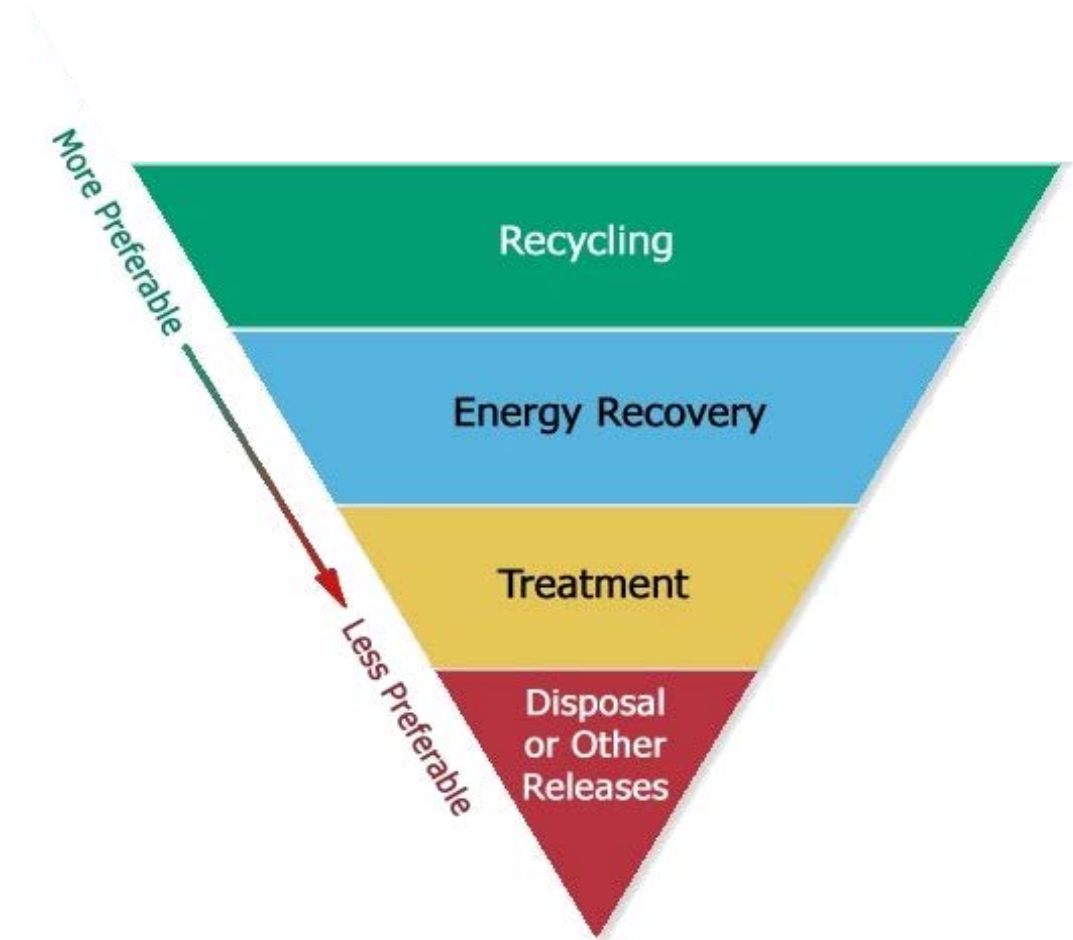


Disposal to land

# WHAT IS PRODUCTION RELATED WASTE?

Production related waste is the chemical waste that comes from normal operations at a facility.

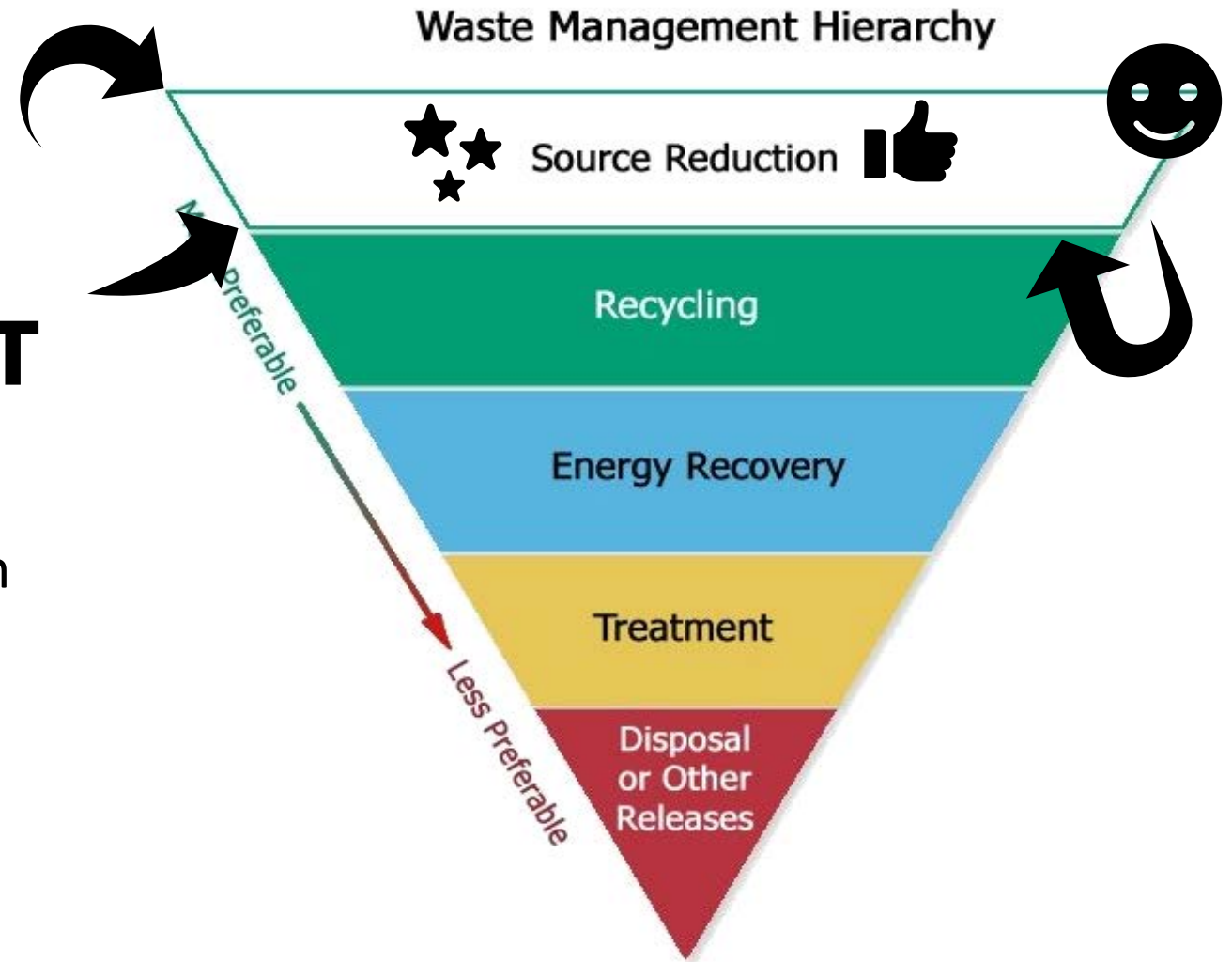
Waste Management Hierarchy





# FACILITIES MUST REPORT P2

Facilities are required by the Pollution Prevention Act to report newly implemented P2 activities.



# WHAT DO FACILITIES REPORT TO TRI?

- **On-site releases**
  - Air emissions
  - Surface water discharges
  - Disposal to land
- **Other on-site waste management**
  - Recycling
  - Energy recovery
  - Treatment
- **Transfers to off-site locations**
- **Pollution prevention activities**
  - Pollution prevention activities
  - Barriers to pollution prevention
  - Optional comments

# WHAT P2 INFORMATION DO FACILITIES REPORT?

- P2 activities
- Barriers to P2 [*optional*]
- Free-text comments [*optional*]

# HOW DO FACILITIES REPORT P2 INFORMATION?

## P2 ACTIVITIES



Select from 24 codes organized into five categories to describe the source reduction activity.

# HOW DO FACILITIES REPORT P2 INFORMATION?

## BARRIERS TO P2

- B1** Insufficient capital
- B2** Require technical information on pollution prevention
- B3** Concern that product quality may decline
- B4** Source reduction unsuccessful
- B5** Specific regulatory/permit burdens
- B6** Maxed out
- B7** No known substitutes or alternatives
- B8** Reduction does not appear to be technically feasible
- B99** Other barriers

# HOW DO FACILITIES REPORT P2 INFORMATION?

## FREE-TEXT COMMENTS

**As facilities add source reduction activities and barriers, they have the option to report additional information in open-ended text fields.**

- Source Reduction
- Waste Management
- Other Information

Facilities can include information not captured by P2 codes alone, e.g:

- Processes affected by source reduction
- Other benefits such as lower water use
- Use of specific materials



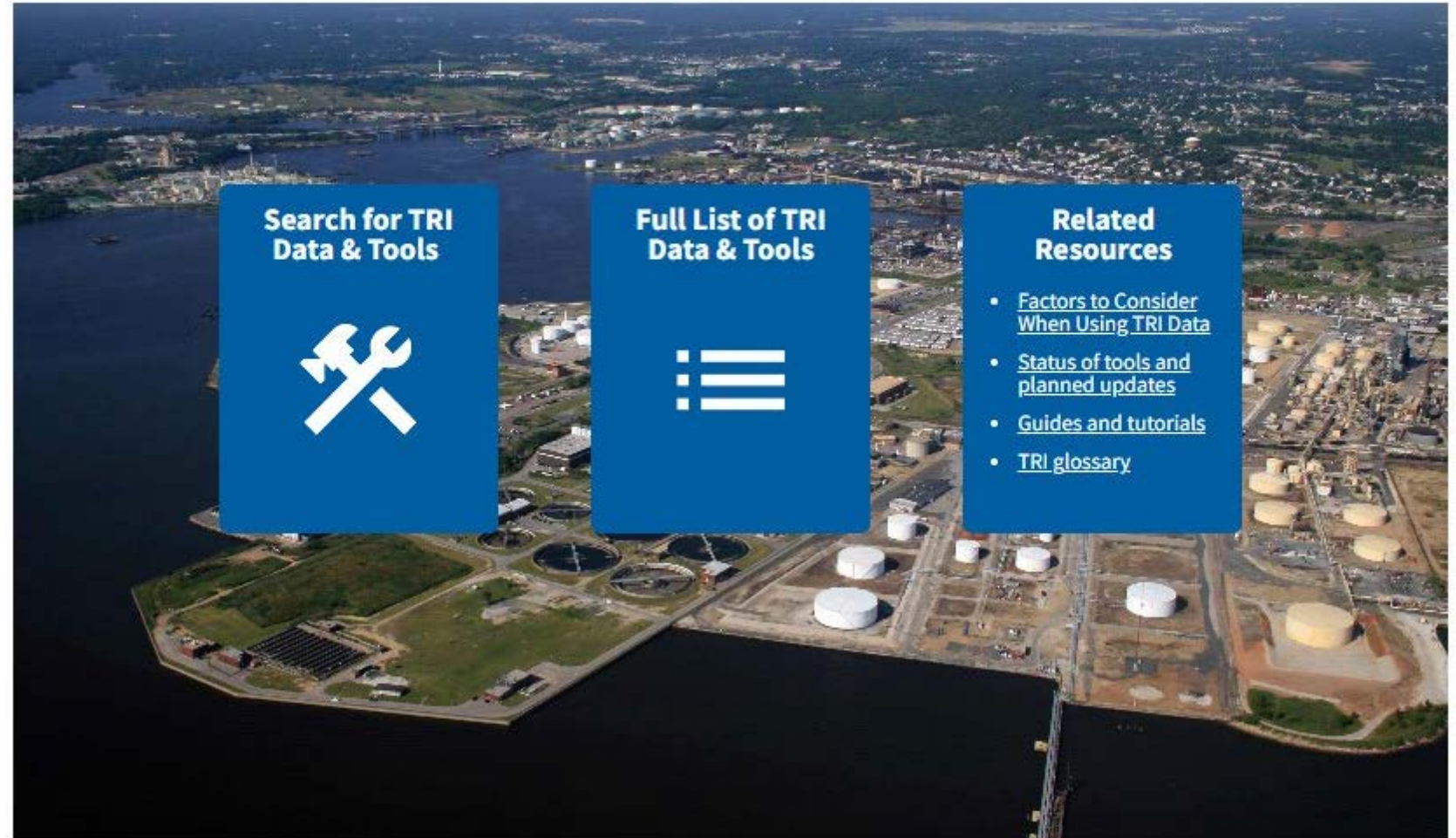
# ACCESSING TRI DATA



# NEW! TRI TOOLBOX

- Find tools based on topic or area of interest
- See full suite of TRI tools and data formats
- Find resources on how to use TRI data

The Toxics Release Inventory (TRI) Program tracks the industrial management of toxic chemicals. TRI data are reported annually by industrial and federal facilities that meet reporting requirements. EPA makes these data available through multiple online tools, many of which add context to help make the reported data more understandable.







# DEMO TRI TOXICS TRACKER

Reporting Year  
3 of 10

X CLEAR &lt; BACK FORWARD &gt;

Home Page

Map

Summary

Tribal Lands

Releases

Waste Managed

Waste Transfers

Pollution Prevention

Chemicals

Potential Harm

Customizable Tables

✓ You are currently viewing data for facilities based on your search parameters shown in the green bar above +

Filters and Options

# Facilities

23,868

# Reporting Years

3 (2021 - 2023)

# Chemicals Reported

568

# Reporting Forms

235,652

## Pollution Prevention

MORE INFO

Facilities with Source Reduction

3,008

Source Reduction Activities

10,879

Barriers to P2

11,624

Free-Text Comments

24,758

## About Pollution Prevention Data

Pollution prevention (P2), also known as "source reduction", is any practice that reduces, eliminates, or prevents the creation of pollution prior to recycling, treatment, disposal, or release into the environment. Facilities are required to report any new source reduction activities each year by selecting codes on the TRI reporting form that best correspond to the implemented activity. If facilities are unable to implement new source reduction activities, they may report barriers to source reduction using barrier codes. Facilities also have the option to provide additional details in comments.

## Quick Filters:

- ☐ Green Chemistry and Engineering Activities
- ☐ Source Reduction Reported
- ☐ Barriers to P2 Reported

Source Reduction Category

Source Reduction Activity

Barrier to Source Reducti...

Comment Type

Source Reduction

Barriers

By Chemical

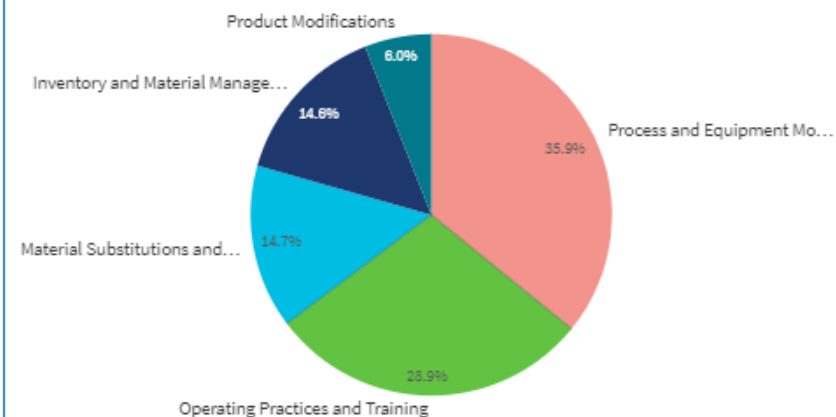
By Industry Sector

By Location

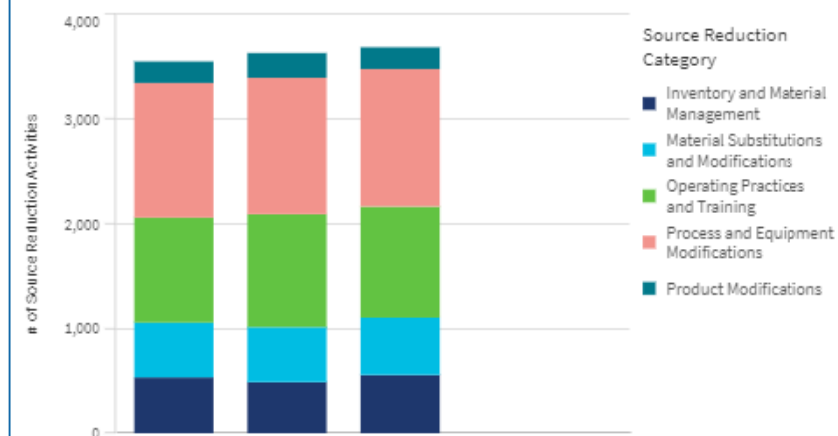
Activities and Comments

View All Pollution Prevention Charts

## Source Reduction Activity by Category



## Source Reduction Activity by Category and Year



# COMMENT ANALYSIS FOR SOLVENT SUBSTITUTIONS

TRI facilities submitted **46,035 source reduction comments** from 2005 to 2020

Created methodology to automate analysis of optional comments to find information about solvent substitutions: Identified 1,926 comments related to solvent substitutions during this 15-year timespan.

## SELECT COMMENTS FOR TRI-LISTED SOLVENTS

Pull free-text  
comments from forms  
for TRI-listed chemicals  
commonly used as  
solvents

## KEYWORD FILTERING

Narrowed group of  
comments by selecting  
those containing  
keywords

### **Substitution phrases**

- Substitute, alternative

### **Processes**

- Powder coating,  
mechanical cleaning

### **Known alternatives**

- Aqueous, water-based

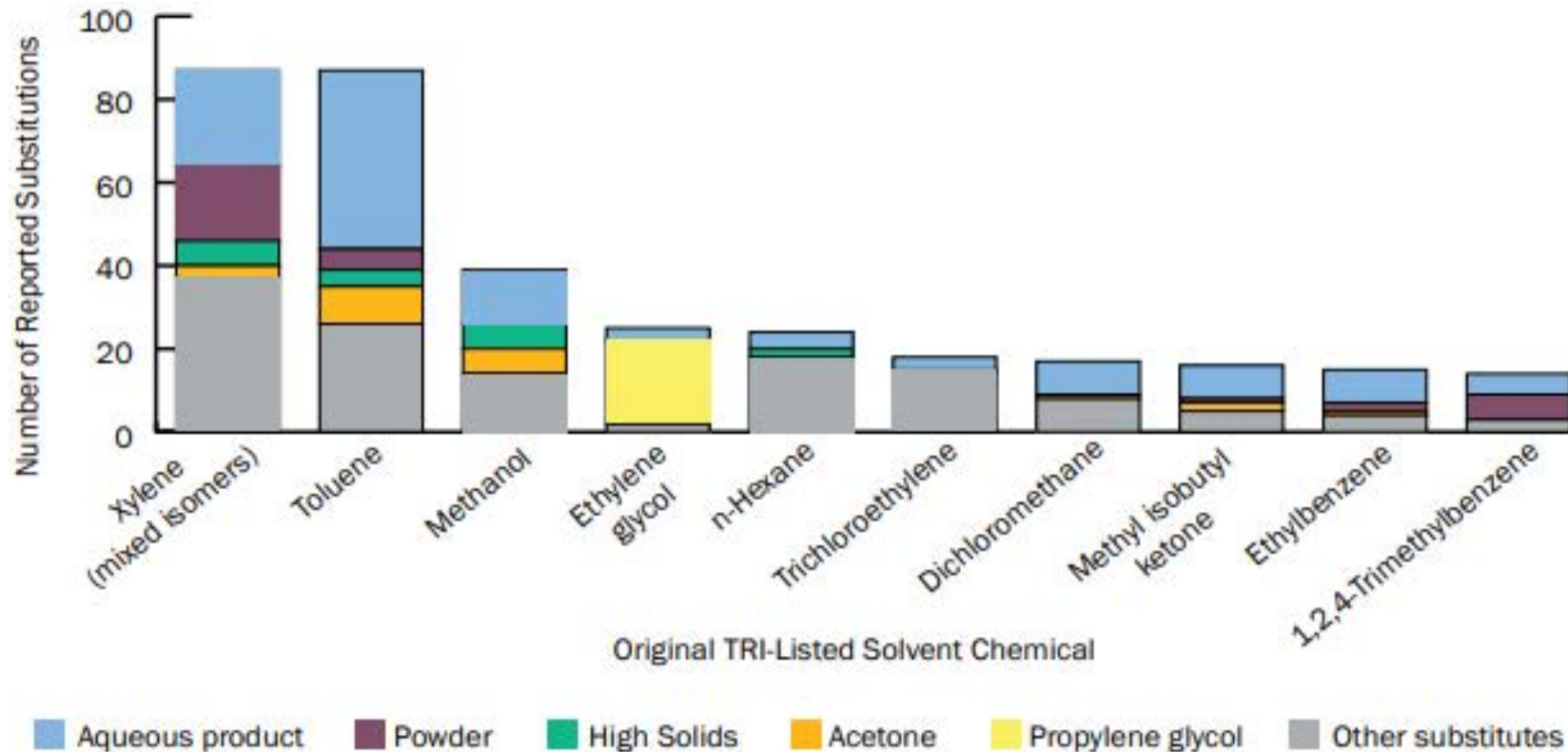
## MANUAL REVIEW

Review comments to  
identify original solvent  
and replacement  
chemical or process

## DATABASE OF SPECIFIC SOLVENT SUBSTITUTIONS

# WORKFLOW FOR COMMENT ANALYSIS

**391 comments** describe specific substitutions, reported by facilities in 16 industry sectors



**116 distinct combinations**

### Most replaced

- Xylene (mixed isomers)
- Toluene
- Methanol

### Most common substitutes

- Aqueous products
- Powder coatings
- High solids formulations

# ACCESSING SOLVENT SUBSTITUTION INFORMATION REPORTED TO TRI

Webpage | Handout | Interactive table | Downloadable spreadsheet

Solvent Substitution Comments Reported to TRI, 2005–2020

No selections applied

Selections

Industry Sectors with Substitutions

16

Specific Substitution Comments

391

Distinct Substitution Combinations

116

☐ Sub to TRI

☐ TSCA Flag

☐ SCIL Flag

Download current data

Download all data

Definitions

To narrow results, use the flags or the table headers to filter.

TRI Chemical ID	Original Chemical	Substitute Chemical	Substitute Chemical 2	Comment	Year	TRI Facility	TRI Industry Sector	NAICS
0000079005	1,1,2-Trichloroethane	Aqueous product		Installed and brought on line an aqueous washing system to replace the degreaser.	2019	K & G MANUFACTURING CO - 55021KGMNF226PA	332 Fabricated Metals	332710 Machine Shops
0000095636	1,2,4-Trimethylbenzene	Aqueous product		Aquaous parts cleaner replaced solvent based cleaner in early 2011 should see significant reductions for 2011 RY.	2010	RIKER PRODUCTS INC - 4361WRKRPR491ST	336 Transportation Equipment	336399 All Other Motor Vehicle Parts Manufacturing
0000095636	1,2,4-Trimethylbenzene	Aqueous product		Converted to waterbase finish	2013	FLEXSTEEL INDUSTRIES INC - 39759FLXST500IN	337 Furniture	337121 Upholstered Household Furniture Manufacturing
0000095636	1,2,4-Trimethylbenzene	Aqueous product		Internal practices to reduce solvent content of vehicle coatings. Switched from solvent to water based coatings for a significant portion of vehicle manufacturing process.	2012	HONDA DEVELOPMENT & MANUFACTURING OF AMERICA LLC - ALABAMA - 35096HNDMF1800H	336 Transportation Equipment	336112 Light Truck and Utility Vehicle Manufacturing
0000095636	1,2,4-Trimethylbenzene	Aqueous product		Reduction in total amount of chemicals used and going to a water based product for final	2011	SHAHER COMMERCIAL SEATING -	337 Furniture	337211 Wood Office Furniture





DEMO  
TRI SOLVENT  
SUBSTITUTIONS





## Solvent Substitution Comments Reported to TRI, 2005-2023

Original Chemical  
Trichloroethylene

4

Filters appear here, confirm correct filter applied

Industry Sectors with Substitutions

7

Specific Substitution Comments

22

5

☐ Sub to TRI  
☐ TSCA Flag

[Download current data](#)  
[Download all data](#)  
[Definitions](#)

To narrow results, use the flags or the table headers to filter.

TRI Chemical ID	Original Chemical	Substitute Chemical	Substitute Chemical 2	Comment	Year	TRI Facility	TRI Industry Sector	NAICS
0000079016	Trichloroethylene	1-Bromopropane		Trichloroethylene, vapor degreasing solvent, was replaced with n-propyl bromide effective January 1st, 2014. This was a pollution	2013	PROTECTIVE COATINGS INC - 98032PRTCT1215N	332 Fabricated Metals	332813 Electroplating, Plating, Polishing, Anodizing, and
0000079016	Trichloroethylene	1-Bromopropane		We discontinued usage of Trichloroethylene and switch to N-Propyl Bromide solvent	2013	UTICA CUTLERY CO - 13502TCCTL820NO	332 Fabricated Metals	332215 Metal Kitchen Cookware, Utensil, Cutlery, and Flatware
0000079016	Trichloroethylene	1-Bromopropane		We eliminated the use of Trichloroethylene as of Aug 1st 2010. We substituted with N-Propyl Bromide and added a still to the degreasing	2010	VISA LIGHTING AN OLDENBURG GROUP CO - 53209VSLGH1717W	335 Electrical Equipment	335122 Commercial, Industrial, and Institutional Electric
0000079016	Trichloroethylene	Alcohol		One TCE degreasing unit was decommissioned and replaced with modified alcohol degreasing equipment in December 2019.	2019	GREATBATCH LTD (D/B/A GREATBATCH MEDICAL) - 55414GLBTL73024	332 Fabricated Metals	332119 Metal Crown, Closure, and Other Metal Stamping
0000079016	Trichloroethylene	Aqueous product		Aqueous washing	2023	MJ CELCO INC. - 60176CLCND3900W	332 Fabricated Metals	332119 Metal Crown, Closure, and Other Metal Stamping
0000079016	Trichloroethylene	Aqueous product		Converting to aqueous degreasing and soak	2013	NICO PRODUCTS INC -	332 Fabricated	332813 Electroplating,

Industry Sectors with Substitutions

1

Specific Substitution Comments

97

Distinct Substitution Combinations

47

☐ Sub to TRI

☐ TSCA Flag

Download current data

Download all data

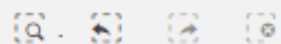
Definitions

Filters for sector and subsector

To narrow results, use the flags or the table headers to filter.

TRI Chemical ID	Original Chemical	Substitute Chemical	Substitute Chemical 2	Comment	Year	TRI Facility	TRI Industry Sector	NAICS
0000107062	1,2-Dichloroethane	Toluene		Toluene will substitute the processes that used 1,2-DCE.	2021	BELL LABORATORIES INC. - 53704BLLLB3699K	325 Chemicals	325320 Pesticide and Other Agricultural Chemical
0000075058	Acetonitrile	Acetone		Facility has substituted acetone for this material in a number of product lines. Increased demand for products where acetonitrile is	2009	THERMO FISHER SCIENTIFIC MILWAUKEE LLC - 53202PHRMC2202N	325 Chemicals	325413 In-Vitro Diagnostic Substance Manufacturing
0000075058	Acetonitrile	Ethyl acetate	Pyridine	W42: Ethyl acetate and pyridine were substituted for acetonitrile	2012	INTEGRATED DNA TECHNOLOGIES - 9212WNTGRT6828N	325 Chemicals	325199 All Other Basic Organic Chemical Manufacturing
0000075058	Acetonitrile	Pyridine		Pyridine was substituted for acetonitrile	2011	BACHEM INC - 92121BCHMN6868N	325 Chemicals	325199 All Other Basic Organic Chemical Manufacturing
0001330207	Alkyd	Latex		Continuing process of replacing Alkyd products with less hazardous Latex alternatives	2023	BENJAMIN MOORE & CO-MILFORD - 01757BNJMN49SUM	325 Chemicals	325510 Paint and Coating Manufacturing
0000110827	Carbohexane	Aqueous product		Company business philosophy is to convert	2010	PPG ARCHITECTURAL	325 Chemicals	325520 Adhesive

# Solvent Substitution Comments Reported to TRI, 2005-2023



No selections applied



Selections

Industry Sectors with Substitutions

16

Specific Substitution Comments

450

Distinct Substitution

☐ Sub to TRI

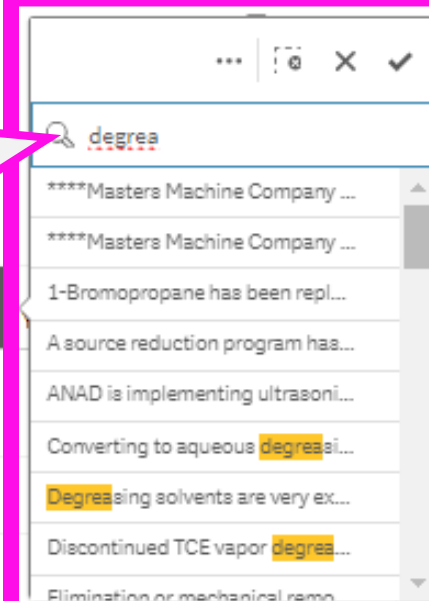
Download current data

Download all data

Definitions

To narrow results, use the flags or the table headers

Search comments for processes, equipment, etc. by typing keyword. Hit enter to see all comments with selected keyword



TRI Chemical ID	Original Chemical	Substitute Chemical	Substitute Chemical 2	Comment	Year	Company	NAICS	Industry
0000106945	1-Bromopropane	Next 5408		1-Bromopropane has been replaced with an alternative vapor degreasing solvent mixture called "Next 5408". The new proprietary				
0000079005	1,1,2-Trichloroethane	Aqueous product		Installed and brought on line an aqueous washing system to replace the degreaser.				
0000107062	1,2-Dichloroethane	Toluene		Toluene will substitute the processes that used 1,2-DCE.				
0000095636	1,2,4-Trimethylbenzene	Aqueous product		Aquaous parts cleaner replaced solvent based cleaner in early 2011 should see significant reductions for 2011 RY.	2010	RIKER PRODUCTS INC - 4361WRKRPR491ST	336 Transportation Equipment	336399 All Other Motor Vehicle Parts Manufacturing
0000095636	1,2,4-Trimethylbenzene	Aqueous product		Converted to waterbase finish	2013	FLEXSTEEL INDUSTRIES INC - 39759FLXST500IN	337 Furniture	337121 Upholstered Household Furniture Manufacturing
0000095636	1,2,4-Trimethylbenzene	Aqueous product		Internal practices to reduce solvent content of vehicle coatings. Switched from solvent to	2012	HONDA DEVELOPMENT & MANUFACTURING OF	336 Transportation Equipment	336112 Light Truck and Utility Vehicle



# QUESTIONS?

## Visit our booth!

TRI staff are on site to help with TRI tools and specific queries

## TRI Program Home

<https://www.epa.gov/tri>

## Additional questions and follow-up

"Contact Us" link

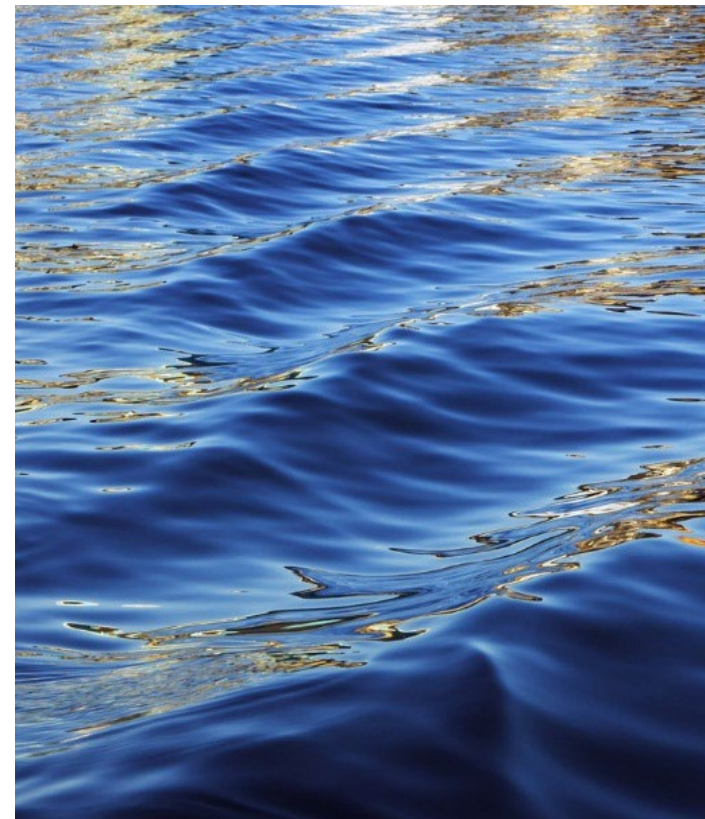
[TRI.Help@epa.gov](mailto:TRI.Help@epa.gov)

[snyder.charlotte@epa.gov](mailto:snyder.charlotte@epa.gov)



# P2 Technical Assistance Tools

Jason Marshall  
Laboratory Director  
Toxics Use Reduction Institute  
University of Massachusetts Lowell



# TURI Lab and Research Team

- Jason Marshall – lab director
- Alicia McCarthy – sanitizing performance testing and training
- Amelia Wagner – cleaning performance testing, on-site visit assistance
- Alex Symko – cleaning performance testing, on-site visit assistance
- Gabriel Salierno – green chemistry
- Greg Morose – research program manager



# Toxics Use Reduction Institute (TURI)

Specializes in assisting facilities in reducing their use of toxic chemicals through education and hands on assistance

- Safety
- Feasibility
- Cost savings of safer alternative

## Supports Businesses

- Successfully implement projects that protect their workers, communities and the environment
- Reducing use of toxic chemicals
- Offers grants to help businesses
  - Research
  - Evaluate
  - Adopt safer alternatives



# Training, Testing, Technical Assistance, Transfer Success

## Provide TUR Background

- History of the program
- Success of the program

## Showcase lab resources

- Testing
- CleanerSolutions
- P2OASys
- HSPiP

## Providing On-site Technical Assistance

- Beginning of project
- During project
- During implementation on-site

## Outreach Materials

- Case studies reports
- Videos
- Guidance documents

# EPA proposed ban on TCE

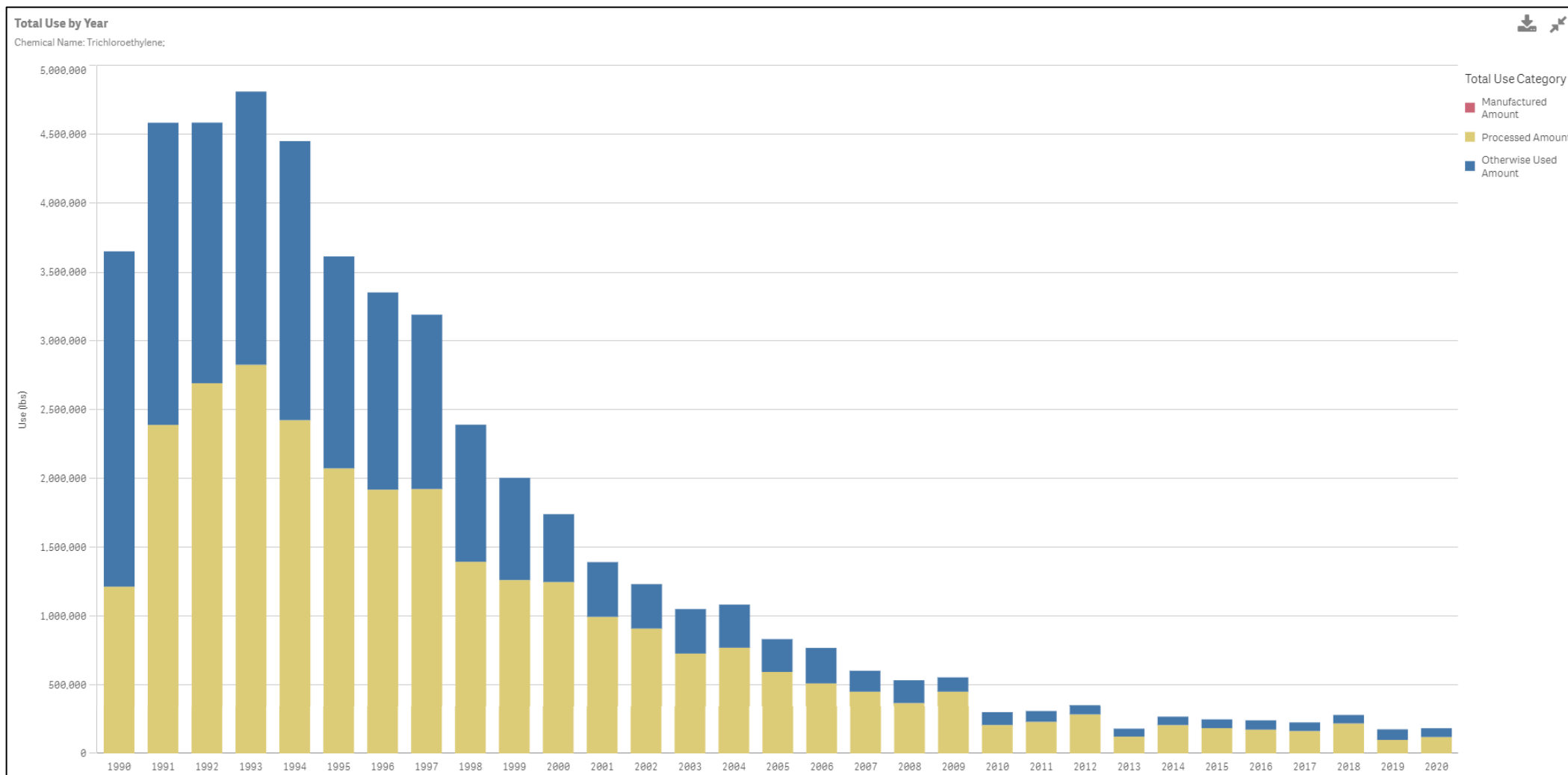


Work closely with TCE end users to identify operating conditions that will best fit the desired cleaning needs



Focus on companies within Environmental Justice locations

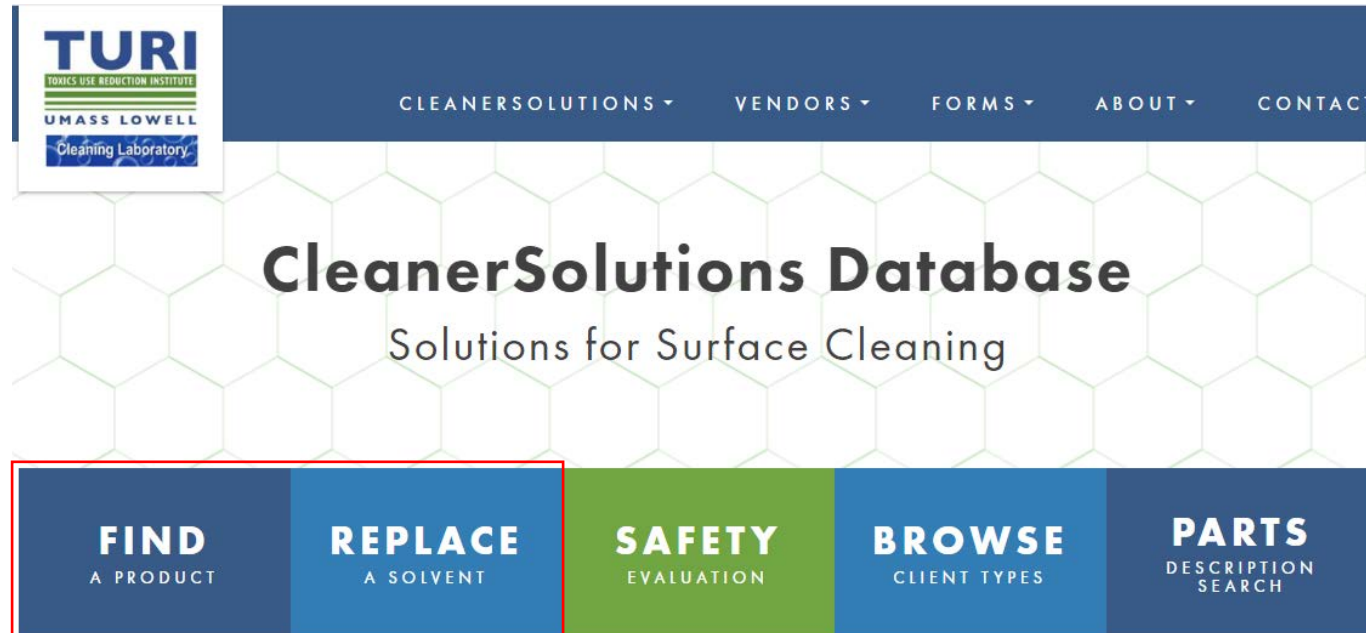
# TCE Usage in Massachusetts



# TCE Lab Testing: Massachusetts Companies Assisted

Sector	MA Companies Reporting Use of TCE Since 1993	
	Number (total = 47)	Percentage
Capacitor Manufacturing	2	4
Plating and Metalworking	22	47
Aircraft	1	2
Semiconductor/Electronics	2	4
General Manufacturing	14	30
Jewelry	4	9
Tools	1	2
Wire and Cable	1	2

# CleanerSolutions.org



The image shows the top section of the CleanerSolutions.org website. On the left is the TURI logo, which includes the text 'TURI', 'TOXICS USE REDUCTION INSTITUTE', 'UMASS LOWELL', and 'Cleaning Laboratory'. To the right of the logo is a dark blue navigation bar with white text links: 'CLEANERSOLUTIONS', 'VENDORS', 'FORMS', 'ABOUT', and 'CONTACT'. Below the navigation bar is a large section with a light green hexagonal pattern background. The title 'CleanerSolutions Database' is centered in a large, bold, black font, with the subtitle 'Solutions for Surface Cleaning' below it in a smaller, regular black font. At the bottom of this section is a horizontal row of five colored buttons: 'FIND A PRODUCT' (dark blue), 'REPLACE A SOLVENT' (medium blue), 'SAFETY EVALUATION' (green), 'BROWSE CLIENT TYPES' (blue), and 'PARTS DESCRIPTION SEARCH' (dark blue). The 'FIND' and 'REPLACE' buttons are highlighted with a red border.

**TURI**  
TOXICS USE REDUCTION INSTITUTE  
UMASS LOWELL  
Cleaning Laboratory

CLEANERSOLUTIONS ▾ VENDORS ▾ FORMS ▾ ABOUT ▾ CONTACT

## CleanerSolutions Database

Solutions for Surface Cleaning

**FIND**  
A PRODUCT

**REPLACE**  
A SOLVENT

**SAFETY**  
EVALUATION

**BROWSE**  
CLIENT TYPES

**PARTS**  
DESCRIPTION  
SEARCH

## FORMS



Two rounded rectangular buttons are displayed under the 'FORMS' header. The first button is dark blue with white text 'CLIENT TEST REQUEST FORM'. The second button is green with white text 'VENDOR FORMS'.

CLIENT TEST REQUEST FORM

VENDOR FORMS

## VENDOR INFORMATION



Two rounded rectangular buttons are displayed under the 'VENDOR INFORMATION' header. The first button is dark grey with white text 'SEARCH VENDOR SUPPLIED INFO'. The second button is blue with white text 'BROWSE VENDORS & PRODUCTS'.

SEARCH VENDOR SUPPLIED INFO

BROWSE VENDORS & PRODUCTS

**TAKE A TOUR OF THE TURI LAB**

# Find an Alternative for Current Solvent

## Replace a Solvent

Based on testing conducted by lab to replace listed solvent.  
Displayed results are for alternative chemistries evaluated for solvent selected.

### Required Field

You must select one or more solvents.

#### SOLVENT

Trichloroethylene X

320 Cleaner

A.) Pathosans Cleaner B.) Zep High

A.) Pinsol B.) Pathosans

ADF Powdered Concentrate

AGAE Technologies Body Wash

Abrasive Disc

Abrasive Slurry

Acetates

Acetic Acid

Acetone

### Optional Fields

Filter your search by substrate or equipment type, or leave these fields set to Any to include all results for a given contaminant.

#### CONTAMINANT

Oil X

Abrasive

Adhesive

Alcohol

Algae

Asphalt

Bacteria

Bacteria - Gram Negati

Bacteria - Gram Positive

Blood

Bovine Serum Albumin F

#### SUBSTRATE

Stainless Steel X

Alloys

Alumina

Aluminum

Brass

Cadmium plated steel

Carbon Fiber

Carbon Steel

Carpet

Cat Litter

Ceramics

#### EQUIPMENT

Immersion/Soak X

Brillo pad

Cold Solvent

Electrolytic bath

High Pressure Spray

Low Pressure Spray

Manual Paint Stripping

Manual Wipe

Manual spreading

Mechanical Agitation

Media Blasting

### Optional Search Filters

PRODUCT CLEANING TYPE:

Any



RETURN ONLY EFFECTIVE RESULTS

# Searching for a Cleaner

SEARCH CRITERIA

Solvent: Trichloroethylene  
Contaminant: Oil  
Substrate: Stainless Steel  
Equipment: Immersion/Soak  
Effective: Yes

RESULTS

Found 70 records  
Showing records 1 - 50

COMPARE	COMPANY NAME PRODUCT NAME	SAFETY EVALUATION ▼	CLASSIFICATION▼	CONTAMINANT▼	SUBSTRATE▼	EQUIPMENT▼	CLIENT # PROJECT # TRIAL #
<input type="checkbox"/>	Alconox Inc Citranox	4.1	Acidic Aqueous	Oil	Stainless Steel	Immersion/Soak	48111
<input type="checkbox"/>	Fisher Scientific Dimethyl glutarate (CAS:1119-40-0)	3.6	Ester Organic	Oil	Stainless Steel	Immersion/Soak	48111
<input type="checkbox"/>	Keteca USA Water Works Heavy Duty Degreaser	3.6	Alkaline Aqueous	Oil	Stainless Steel	Immersion/Soak	48111
<input type="checkbox"/>	Kyzen Corporation Metalnox M6386	4.6	Alcohol	Oil	Stainless Steel	Immersion/Soak	48111
<input type="checkbox"/>	Mirachem Corporation Mirachem 500	4.6	Alkaline Aqueous	Oil	Stainless Steel	Immersion/Soak	48111
<input type="checkbox"/>	Fisher Scientific Dimethyl glutarate (CAS:1119-40-0)	3.6	Ester Organic	Oil	Stainless Steel	Immersion/Soak	47119
<input type="checkbox"/>	Gemtek Products SC Aircraft & Metal Cleaner Super Concentrate	4.1	Alkaline Aqueous	Oil	Stainless Steel	Immersion/Soak	47119
<input type="checkbox"/>	Kyzen Corporation Metalnox M6386	4.6	Alcohol	Oil	Stainless Steel	Immersion/Soak	47119
<input type="checkbox"/>	Fisher Scientific Dimethyl glutarate (CAS:1119-40-0)	3.6	Ester Organic	Oil	Stainless Steel	Immersion/Soak	47116
<input type="checkbox"/>	Gemtek Products SC Aircraft & Metal Cleaner Super Concentrate	4.1	Alkaline Aqueous	Oil	Stainless Steel	Immersion/Soak	47116
<input type="checkbox"/>	Fisher Scientific Dimethyl glutarate (CAS:1119-40-0)	3.6	Ester Organic	Oil	Stainless Steel	Immersion/Soak	47116

**Trial Purpose:**

**The purpose of this experiment was to determine the effectiveness of cleaners on fresh parts provided by the company.**

**Date Run:**

03/22/2021

**Experiment Procedure:**

Cleaners were prepared to the following concentrations: Metalnox 6386 100%, Dimethyl Glutarate 100%, SC Aircraft & Metal Cleaner 20%. Dimethyl Glutarate and SC Aircraft & Metal were heated to 120°F while Metalnox was kept at room temperature. One stainless steel part provided by the company was obtained for each of the cleaners being tested. Parts were pre-soiled with grind oil by the company. Photos and a white glove test were utilized to show the presence of the soil on the substrates before cleaning. Once solutions reached the proper temperature, parts were submerged into their respective cleaners. Unheated immersion in Metalnox 6386 was conducted for 15 minutes. After 15 minutes had passed, the part was removed from solution and dried with a heat gun. Heated immersion with a stir bar added for agitation was conducted for 30 minutes for both Dimethyl Glutarate and SC Aircraft & Metal Cleaner. After 30 minutes had passed, the part cleaned with SC Aircraft was rinsed in a deionized water bath also at 120°F for 30 seconds. Both parts were then dried with a heat gun. Following the drying step, more photos and an additional white glove test were utilized to show the removal of soil after the cleaning process. Effectiveness of the cleaners was determined.

**Trial Results:**

Cleaner	Observations
Metalnox 6386	Can see a clear distinction between cleaned and uncleaned area.
Dimethyl Glutarate	Solution has developed a slight yellow tint indicating the removal of the oil. Clear distinction between cleaned and uncleaned area.
SC Aircraft & Metal	Oil visibly pooling at the surface of solution indicating removal.

All parts dried very quickly using the heat gun (approximately 2 minutes).

All cleaners were visibly effective at removing the oil from stainless steel parts. Photos will be provided that clearly show the removal of the oil following the cleaning process. Parts did not sustain any visible damage or changes from the cleaners. Next steps would be to discuss the results with the company.

**Success Rating:**

Results successful using TACT (time, agitation, concentration, and temperature, as well as rinsing and drying) and/or other cleaning chemistries examined.

**Conclusion:**

Upon completion of testing, it was verified that all cleaners were effective at removing the oil from stainless steel parts. Next steps would be to discuss the results with the company.



# Metalnox M6386

## VENDOR PROVIDED INFORMATION

Product information cited in this section is supplied directly by the vendors. The Institute has not verified the accuracy of any of this information and is not liable for any claims made by the vendors. TURI is likewise not responsible for any typographical errors.

Vendor Name: Kyzen Corporation

Product Classification: Alcohol

Recommended Contaminants: Cutting/Tapping Fluids, Oil

Recommended Equipment: Immersion/Soak, Mechanical Agitation

Recommended Substrates: Aluminum, Brass, Copper, Glass/Quartz, Gold, Nickel, Stainless Steel, Steel, Sterling/Silver, Tin, Titanium

## Safety Evaluation Detail

+ About the evaluation

CATEGORY	SCORE
Acute Human Effect	8
Chronic Human Effects	2
Ecological Hazards	4
Environmental Fate & Transport	5
Atmospheric Hazard	2
Physical Properties	8
Process Factors	4
Life Cycle Factors	4
Overall Score	4.6

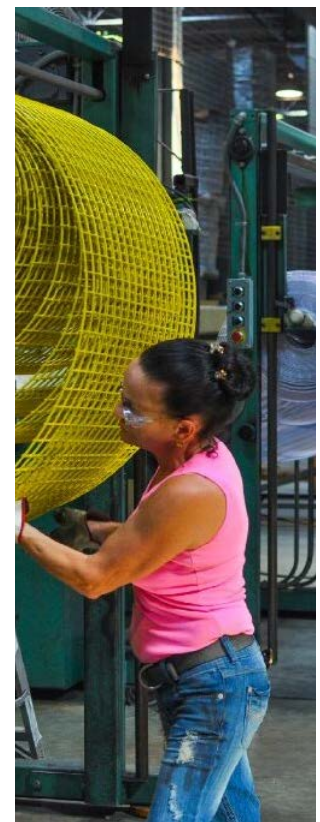
## Laboratory Evaluation of Metalnox M6386 | Field Definitions

CLIENT #	PROJECT #	TRIAL #	CONTAMINANT	SUBSTRATE	EQUIPMENT	EFFECTIVE
457	1	0	Lubricating/Lapping Oils, Oil	Titanium	Immersion/Soak	✗
457	1	1	Oil	Titanium	Immersion/Soak	✓
457	1	2	Oil	Titanium	Ultrasonics	✓
457	1	3	Oil	Titanium	Ultrasonics	✓
332	1	1	Buffing/Polishing Compounds	Aluminum	Immersion/Soak	✓
332	1	2	Buffing/Polishing Compounds	Aluminum	Immersion/Soak	✗
458	1	8	Oil	Steel	Immersion/Soak	✓
458	1	9	Oil	Steel	Immersion/Soak	✓
458	1	10	Oil	Steel	Immersion/Soak	✓
458	1	13	Oil	Cold Rolled Steel	Immersion/Soak	✗
332	1	8	Buffing/Polishing Compounds	Aluminum	Immersion/Soak	✗



# Pollution Prevention Options Analysis System Hazard Discussion Tool (P<sub>2</sub>OASys)

[p2oasys.turi.org](http://p2oasys.turi.org)  
Toxics Use Reduction Institute  
University of Massachusetts Lowell



# P2OASys Hazard Assessment Tool

Allows user to assess potential impacts of alternative chemistries/technologies

- Environmental
- Worker
- Public health

Help users use a more comprehensive and systematic way of thinking about

- Current and alternative processes
- Based on quantitative and qualitative factors

# P2OASys is



## P2OASYS

TURI developed the Pollution Prevention Options Analysis System tool to help companies and others organize information to compare the environmental, health and safety attributes of chemicals, formulated products and production process changes

See full description [here](#)



**START**  
ASSESSMENT

**LOAD**  
FROM DATABASE

**IMPORT**  
FROM FILE

**COMPARE**  
SUMMARY

**VIEW**  
RAW DATA

Name	Data Points / Safety Evaluation	Actions
Trichloroethylene	80 / 8.4	 

**UPLOAD**  
TO DATABASE

**EXPORT**  
TO FILE



## P2OASys Categories

SAVE CHANGES

EXPAND ALL

COLLAPSE ALL

Acute Human Effects	8	▼
Chronic Human Effects	9	▼
Ecological Hazards	8	▼
Environmental Fate & Transport	9	▼
Atmospheric Hazard	6	▼
Physical Properties	10	▼
Process Factors	7	▼
Life Cycle Factors	10	▼

Inhalation Toxicity	4	▼
Oral Toxicity	4	▼
Dermal Toxicity	4	▼
Respiratory Irritation	4	▼
Dermal Irritation	8	▼
Eye Irritation	8	▼
Exposure Limits	8	▼
IDLH	2	▼
Health	6	▼

Units

Value

Score

Memo

Key Phrases

Reversible : ▼

8

GHS Category Level

1B ▼

8

GHS H Phrases

H315 ▼

8



# What Makes P2OASys Different

Process Factors			7	^
Heat				✓
Noise Generation				✓
Vibration				✓
Ergonomic Hazard			6	✓
Psychosocial Hazard			8	✓
High Pressure System			2	✓
High Temperature System			4	✓
Water Use				✓
Energy Use				✓
Exposure Potential			6	✓

## Life Cycle Factors

10



Upstream Effects

8



Consumer Hazard

10



Disposal Hazard (landfill, incineration)

8



Reportable Quantity

4



Recycling



Renewable to Nonrenewable Resource

10

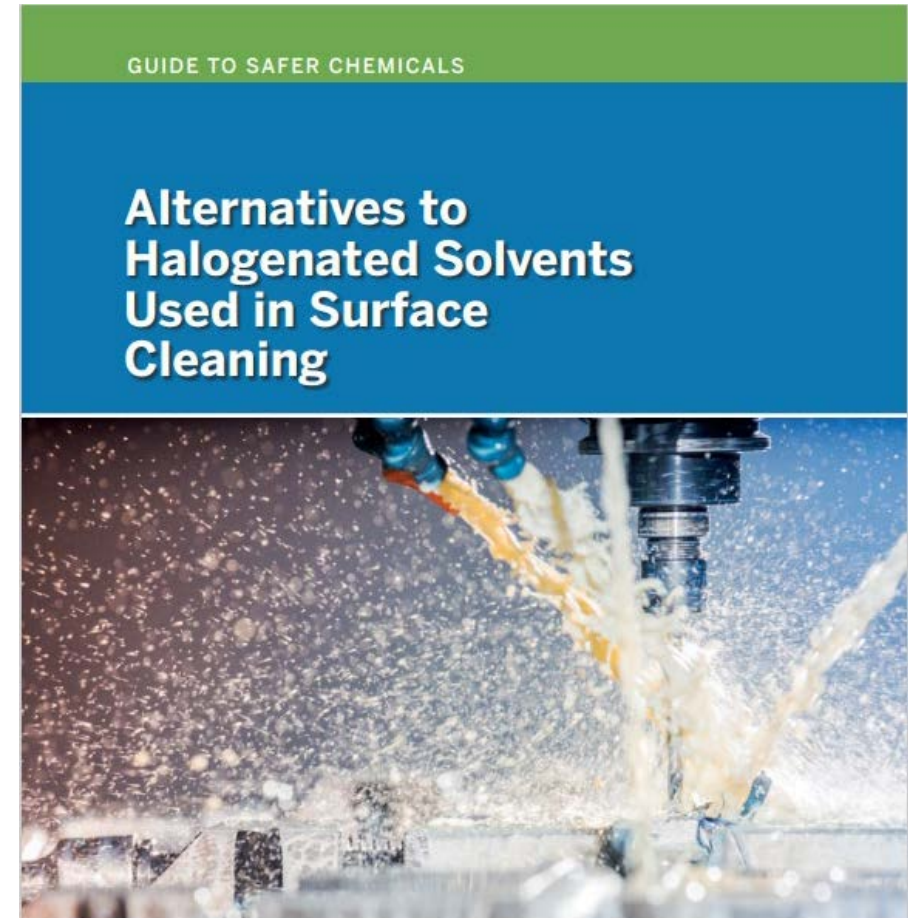


Categories	Trichloroethylene	Aquavantage 1400 GD	Emerald HD 2	Buckeye Immersion Cleaner	Alconox	Dimethyl Glutarate
Acute Human Effects	8	7	5	9	8	2
Chronic Human Effects	9	8	2	4	2	2
Ecological Hazards	8	7	4	5	7	3
Environmental Fate & Transport	9	8	4	7	8	8
Atmospheric Hazard	6	2	2	2	2	2
Physical Properties	10	8	7	7	6	5
Process Factors	7	4	6	5	6	4
Life Cycle Factors	10	4	4	4	6	3
Product Score	8.4	6	4.3	5.4	5.6	3.6

<b>Hazards of Concern <math>\geq 8</math></b>	<b>Trichloroethylene</b>	<b>Aquavantage 1400 GD</b>	<b>Emerald HD 2</b>	<b>Buckeye Immersion Cleaner</b>	<b>Alconox</b>	<b>Dimethyl Glutarate</b>
<b>Acute Human Effects</b>						
Inhalation				10		
Dermal Irritation	8				8	
Eye Irritation	8	8		8	8	
PEL/TLV	8					
<b>Chronic Human Effects</b>						
Carcinogen	10					
Mutagen/ Teratogen	8					
Reproductive/Developmental	8					
Neurotoxicity	8					
Endocrine System Effects	8	10				
Other Chronic Organ Effects	8					

# Review

- Cleanersolutions.org can be a great starting point
  - Request testing for chemicals not in database
- P2OASys is a great tool to organize your options and review the pros and cons of each alternative you are considering
- Resources available through TURI
  - [http://guides.turi.org/beyond\\_sds](http://guides.turi.org/beyond_sds)
  - Alternatives Testing Laboratory
  - Assessment of Alternatives to Halogenated Solvents Used in Surface Cleaning



[turi.org/publications/alternatives-to-halogenated-solvents-used-in-surface-cleaning/](http://turi.org/publications/alternatives-to-halogenated-solvents-used-in-surface-cleaning/)





# Toxics Use Reduction Institute

[www.turi.org](http://www.turi.org)

978-934-3275

The Offices at Boott Mills West

126 John Street, Suite 14

Lowell, MA 01852



**Jason Marshall**

**TURI Lab Director**

Jason\_Marshall@uml.edu

978-934-3133



# P2 Tools in Action

Pathways to Safer Solutions

Cris Brazil, PhD – Pollution Prevention Specialist

[cristianekbrazil@ksu.edu](mailto:cristianekbrazil@ksu.edu)



Pollution Prevention Institute

# Pollution Prevention Institute (PPI)

- Since 1989
- K-State College of Engineering - Engineering Extension
- 100% grant-funded
- Non-regulatory
- P2 Program
- Small Business Environmental Assistance Program (SBEAP)



Pollution Prevention Institute

# Supporting Kansas through Pollution Prevention (P2)

We work with industries, communities, and institutions to:

- Preserve Kansas resources
- Promote sustainable practices
- Protect public health
- Support the economy
- Highlight Environmental Justice (EJ)
- Amplify P2 efforts

Workshops,  
seminars, and  
educational materials

Internship  
program

Technical assistance  
to any size industry



2024 Summer Interns



Pollution Prevention Institute



# The Benefits of Reducing Toxic Chemicals

## Community

Cleaner air for nearby residents

## Industry

Lower regulatory burden, reduced waste generation, increased operational efficiency

People  
Planet  
Profit

## Water

Protection of local waterways and aquatic systems

## Workers

Healthier workplaces for employees

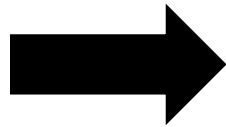


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# In an Ideal World...

- We could reach **all companies** in Kansas
- Identify **every** potential project
- Have access to **all solutions and technologies**
- Companies would **implement every opportunity**

Resistance to change  
Technical constraints  
Limited resources



Which companies should we prioritize?  
How do we engage companies?  
Which P2 projects are most feasible?



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# How P2 Tools Address Challenges

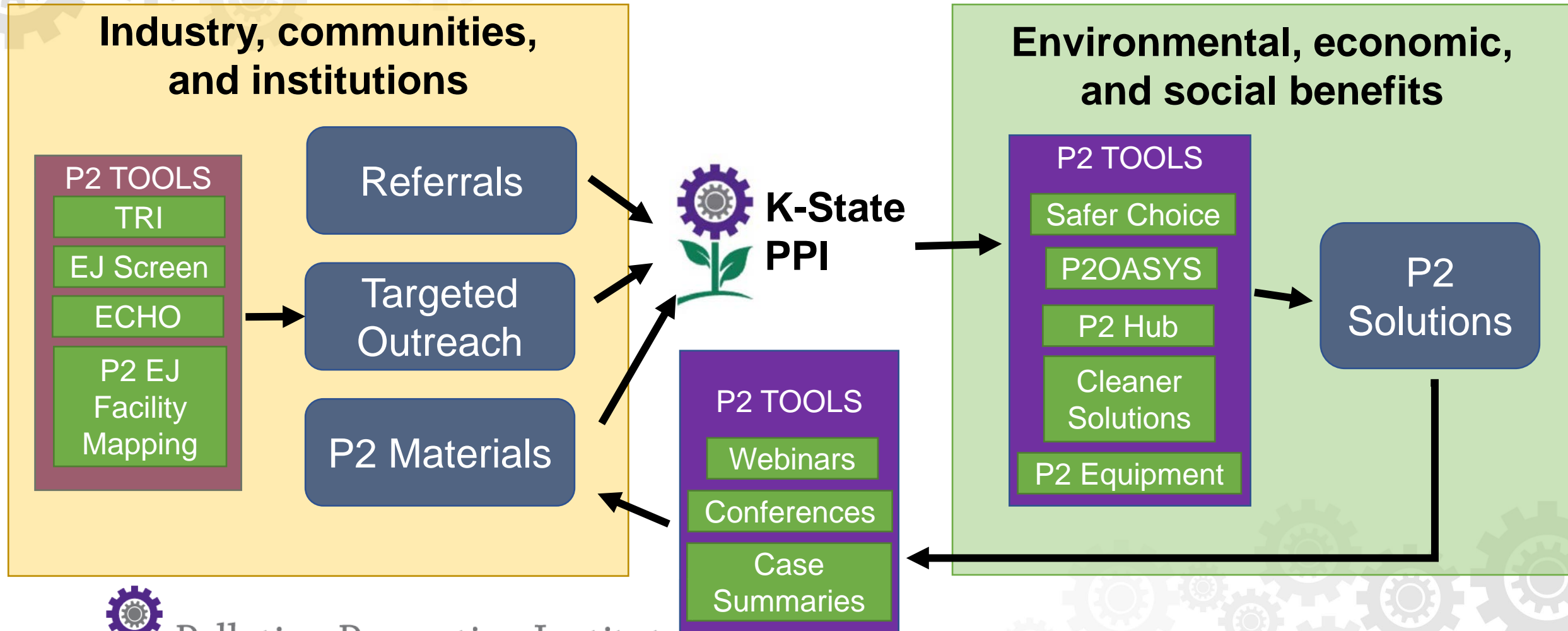
- Enhancing decision-making
- Bridging technical gaps
- Amplifying education and support
- Identifying high-impact, inclusive opportunities



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# How P2 Happens



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# Targeted Outreach - Examples

- Toxics Release Inventory (TRI)
  - Identify industries with significant environmental impact and commonly used chemicals
- P2 EJ Facility Mapping Tool
  - Identify facilities in overburdened EJ communities
- Enforcement and Compliance History Online (ECHO)
  - Prioritize outreach to facilities needing compliance assistance
- EJ Screen
  - Identify areas with high pollution burden and socio-economic challenges



# Finding P2 Solutions - Examples

- Case Summaries, P2 Hub, Webinars
  - Successful examples, new ideas, technical solutions
- Cleaner Solutions, Safer Choice, P2OASYS
  - Identify less hazardous chemicals and materials



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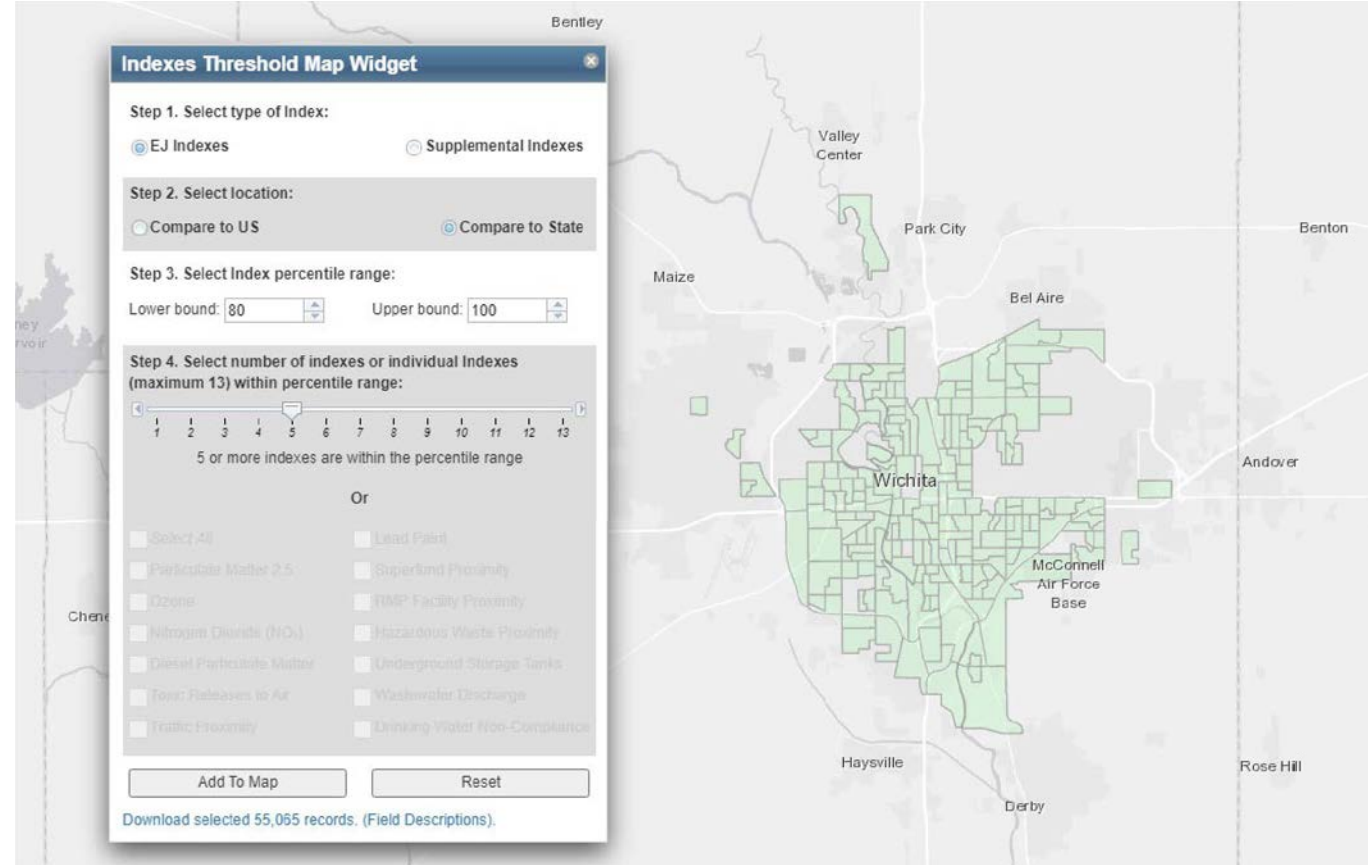
[www.sbeap.org](http://www.sbeap.org)

# Targeting TCE Reduction

TRI Trichloroethylene (TCE) releases in KS



## EJ Screen



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# CleanerSolutions Database

Solutions for Surface Cleaning

**FIND**

A PRODUCT

**REPLACE**

A SOLVENT

**SAFETY**

EVALUATION

**BROWSE**

CLIENT TYPES

**PARTS**

DESCRIPTION  
SEARCH

## 3P PROCESSING

Intern: Sarah Baden

Major: Biosystems and  
Environmental Engineering

School: Kansas State University



## Current Search Information

### SEARCH CRITERIA

Solvent: Trichloroethylene

Substrate: Aluminum

Effective: Yes

Currently Available Results Only: Yes

### RESULTS

Found 106 records

Showing records 1 - 50

### REFINE YOUR SEARCH BY SAFETY EVALUATION

- 2 < 4 Lower concern (13)
- 4 < 6 Medium concern (63)
- 6 < 8 High concern (29)
- 8 - 10 Very high concern (1)



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## SUMMARY OF 2024 P2 INTERN RECOMMENDATIONS

Project	Annual estimated environmental impact	Estimated cost savings (\$/year)	Status
TCE vapor degreaser replacement	7,825 lbs. solvent 90,100 kWh electricity -29,615 gallons of water 87.16 MTCO <sub>2</sub> e	\$31,320	Recommended
Paint gun cleaning, solvent use reduction	14,990 lbs. solvent -2,000 kWh electricity 10.54 MTCO <sub>2</sub> e	\$24,025	Recommended
Tank covers, water use reduction	128,300 kWh electricity 96,760 gallons of water 124.93 MTCO <sub>2</sub> e	\$4,915	Recommended
Hazardous waste reduction	More research needed	\$290	More research needed
<b>Total<sup>1</sup></b>	<b>22,815 lbs. solvent 216,400 kWh 67,145 gallons of water</b>	<b>\$60,260</b>	
<b>GHG reductions<sup>1,2</sup></b>	<b>222.63 MTCO<sub>2</sub>e</b>		

# SPiRiT AEROSYSTEMS CASE STUDY

Wichita, Kansas • EPA Region 7  
 NAICS: 336411 Aircraft Manufacturing  
 NAICS: 423860: Transportation Equipment and Supplies  
 (except Motor vehicle) Merchant Wholesalers




**REDGUARD**

**Intern:** Franseira Maldonado Mundo  
**Major:** Industrial systems and manufacturing engineering  
**School:** Wichita State University



**TABLE 1 – SUMMARY OF ALL PROJECTS**

Reductions	Annual Estimated Environmental Impact	Estimated cost savings (\$/year)	Status
Overflow solvent reduction-machine replacement	11.5 tons VOCs 2.71 tons HAPs 3,300-gal hazardous material and hazardous waste reduced	\$48,000	Recommended
Returned solvent waste reduction	3.9 tons VOCs 1.9 tons HAPs 1,100 gal of hazardous material and hazardous waste reduced	\$14,000	Implemented
Fuselage integration solvent reduction	12.5 tons VOCs 3.3 tons HAPs 3600-gal of hazardous material and hazardous waste reduced	\$42,500	Implemented
Strut Nacelle East distillation unit	4 tons VOCs 0.4 tons HAPs 970 gallons of hazardous material 1,200 gallons hazardous waste	\$14,000	Implemented
Facility-wide distillation units	160 tons VOCs 16 tons HAPs 38,000 gallons hazardous material 47,000 gallons hazardous waste reduced	\$620,000	Recommended
 <b>Total</b> <b>190 tons VOCs</b> <b>24 tons HAPs</b> <b>46,000 hazardous material reduced</b> <b>55,000 gallons hazardous waste reduced</b>			

Project status updated 5/2024

**SUMMARY OF 2024 INTERN RECOMMENDATIONS**

Project	Annual estimated environmental impact	Estimated cost savings (\$/year)	Status
Powder coat	2,956 lbs. of MEK 12,715 lbs. of VOC 1,026 lbs. of HAP	\$98,451	Recommended
Lighting exchange	236,782 kWh 253 MTCO <sub>2</sub> e	\$24,554	In progress – 33 %
Water consumption reduction	526,100 gallons of water 77,920 kWh, 78 MTCO <sub>2</sub> e	\$10,823	Recommended
Solar panels	5,733 kWh 5 MTCO <sub>2</sub> e	\$32,722	Recommended
Solar panel water pump	5,733 kWh 5 MTCO <sub>2</sub> e	\$596	Not recommended
<b>Total<sup>2</sup></b>	<b>2,956 lbs. of MEK</b> <b>12,689 lbs. of VOC</b> <b>1,026 lbs. of HAP</b> <b>629,333 kWh</b> <b>526,100 gallons of water</b>	<b>\$167,146</b>	
<b>GHG reductions<sup>1,2</sup></b>	<b>527 metric tons CO<sub>2</sub>e</b>		



# P2 Virtual Reality Training Tool



- Simulate real-world P2 scenarios
- Users step into the role of a pollution prevention specialist
- Interactive learning and broader reach
- Explore virtual facilities and identify opportunities for improvement
  - Air leaks, water leaks, lighting, chemical replacements
- Launch expected for **Spring 2025**



Pollution Prevention Institute



Project in partnership with  
the K-State Salina XR lab

# Thank you!

- [www.sbeap.org](http://www.sbeap.org)
- [ksu-ppi@ksu.edu](mailto:ksu-ppi@ksu.edu)
- Cris Brazil
- [cristianekbrazil@ksu.edu](mailto:cristianekbrazil@ksu.edu)



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KANSAS STATE UNIVERSITY

Pollution Prevention Institute

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**ASK A QUESTION**

Air Quality Tools Dry Cleaners Food Recovery Hazardous Waste Harmful Algal Blooms

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The K-State Pollution Prevention Institute (PPI) is housed within the College of Engineering...more

[sbeap.org](http://sbeap.org)

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# 2024 National Pollution Prevention Training and Conference

## **P2 Tools for Success**

December 11, 2024

11:00AM – 12:00PM ET

**Moderated by Alizabeth Olhasso, EPA**

### **Speakers:**

- **Charlotte (Charlie) Snyder, EPA, Data Analysis and Right to Know Branch**
- **Jason Marshall, Toxics Use Reduction Institute**
- **Dr. Cris Brazil, Kansas State University**