



BUSINESS

THE
MENTORING
HANDBOOK

SOCIETY

ENVIRONMENT

A Guide to Environmental Mentoring for Companies, Nonprofits, and Regulators





THE MENTORING

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HANDBOOK

© 2000 The National Environmental Education & Training Foundation
1707 H Street NW, Suite 900
Washington, DC 20006

Phone (202) 833-2933
Fax (202) 261-6464
www.neetf.org
www.mentor-center.org

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There are a variety of activities that individuals and organizations can undertake to help the environment. For individuals and organizations with strong environmental management experience, sharing information and practices with other businesses can bring about significant environmental improvement. Because not everyone is able to help design an environmental management system or provide technical assistance leading to cleaner production, business-to-business environmental mentoring is an important step towards protecting our environment. That is why an increasing number of companies are encouraging their Environmental Health and Safety (EH&S) staff to become environmental mentors to businesses in their communities and supply-chain networks.

Managing environmental issues in a business setting is complex. It involves navigating the interplay between achieving company objectives, satisfying regulatory requirements, and meeting public expectations. Fortunately over the past 20 years, many companies have cultivated expertise in environmental management and have developed proactive environmental management programs. But many other companies are still struggling to develop effective programs to manage their environmental issues. This is particularly true of small and medium-sized companies that often lack the staff, know-how, and resources to address internal environmental issues in the most efficient and effective manner. Here, environmental mentoring can play an important role. Mentors, with environmental management experience, can provide timely, low-cost, and effective advice in a manner that builds upon the tradition of business learning embodied in mentoring.

Currently there is a great deal of interest in exploring new approaches to facilitating environmental excellence across the business community. This primer provides an introduction to environmental mentoring and practical information for starting a mentoring initiative. Through the development of this Handbook and other mentoring materials, the Institute for Corporate Environmental Mentoring (ICEM) at The National Environmental Education & Training Foundation seeks to provide resources that support and catalyze interest in environmental mentoring as a means for facilitating environmental excellence.

Braden Allenby, AT&T
Vice President
Environment, Health and Safety
ICEM Steering Committee Co-Chair

Arthur Gibson, R.R. Donnelley & Sons, Co.
Vice President
Environmental Health & Safety
ICEM Steering Committee Co-Chair

Mentoring is as old as business itself. For centuries, craftspeople, artisans, farmers, and trade workers have used mentoring relationships to grow their businesses or pass knowledge and skills from one individual to another. The practice of sharing the benefit of others' experience and insight — instead of each individual having to reinvent the proverbial wheel — can be equally rewarding to both mentors and mentees.

The growing practice of environmental mentoring for businesses is similarly rewarding. By sharing hands-on techniques for reducing environmental impacts, companies are finding that they can simultaneously improve their environmental performance and their business performance.

Environmental mentoring describes a wide range of programs and services offered by hundreds of companies, trade associations, nonprofit organizations, academic institutions, and government agencies. Some mentoring programs focus only on smaller companies, others on firms in a particular region or sector, still others on specific processes or techniques. Some companies mentor firms that are part of their supply chain, whether suppliers or customers. Some mentoring programs utilize full-time professional staff, while others rely solely on volunteers.

Despite their differences, these mentoring programs share the same basic vision: to help companies comply with environmental regulations, improve their knowledge of the environmental impacts of their operations, and harness best management practices to align environmental responsibility with business success.

HOW MENTORING FITS WITH RECENT TRENDS

The growing interest in business environmental mentoring dovetails with a variety of other trends. Among them:

- **Changing Expectations** — In recent years, the definition of environmental responsibility has

extended beyond ensuring compliance with government regulations, and even beyond a handful of proactive initiatives. Among leadership companies, environmental responsibility now includes a comprehensive view of one's operations, products, and facilities with an eye to eliminating waste and emissions; maximizing the efficiency and productivity of all assets and resources; enhancing reputation and relationships with stakeholders; and developing new products, services, and markets. Mentoring can help ensure compliance as well as identify opportunities to make other operational improvements that can dramatically reduce waste and emissions well beyond regulatory requirements.

- **Increased Disclosure** — Companies of all sizes and in all sectors are experiencing growing demands from government, citizens, and other stakeholders to disclose their environmental emissions and performance. In the U.S., a series of "right-to-know" laws and the resulting disclosure by companies have yielded a vast amount of information available to the

SUCCESS STORY

HANDY & HARMAN, an electroplating company in North Attleboro, Mass., implemented recommendations of a WasteCap of Massachusetts site visit to cut solid waste disposal costs by 45%; increase pallet reuse from 20% to 80%; improve cardboard and paper recycling; and reduce mixed scrap metal disposal by 25,000 pounds per year.

public about company operations. Increasingly, such information is being published in a user-friendly format on the Internet, enabling the average citizen to better understand the toxic emissions and environmental performance of thousands of companies on a facility-by-facility basis. By helping to minimize or even eliminate waste and emissions, mentoring can help ensure that company operations are seen in a good light by stakeholders.

- **Growing Focus on Small Business** — Small and mid-sized companies — typically defined as those with annual revenues under \$500 million — are coming under increased scrutiny. This is due in large part to the fact that most larger industrial facilities, which previously had been the biggest source of some pollutants, are in compliance or beyond. Many regulators now see small and mid-sized firms — which generate individually small, but cumulatively large amounts of air and water emissions — as the next tier of companies upon which to focus their efforts. This represents a large and daunting opportunity: In the U.S., 98% of all businesses have fewer than 100 employees, according to U.S. Census data. For regulators, mentoring represents a valuable opportunity to encourage companies to take voluntary measures, enabling government agencies to focus their resources on the most egregious violators.
- **New Regulatory Incentives** — In recent years, national and local government agencies, seeking to reduce the costs and burdens associated with keeping companies in regulatory compliance, have launched a variety of programs to encourage them to adopt voluntary, beyond-compliance measures. In many cases, regulators reward proactive organizations by reducing or eliminating some or all of their regulatory burdens, including inspections and reporting requirements, and offering fast-track permitting for facilities. Mentoring can play a key role in helping companies improve their performance well beyond compliance, enabling them to enjoy the reduced oversight and other benefits that accrue to leadership companies.

HOW MENTORING CAN HELP

Mentoring can yield significant benefits to companies by enhancing business value in a number of direct and indirect ways. These include:

SUCCESS STORY

BEST FEEDS, INC., a pet food manufacturer based near Pittsburgh, Pa., implemented energy-efficiency and manufacturing process improvements that cut electrical usage by 70% in the warehouse area, reduced solid waste by half, and saved at least \$400,000 per year. Best Feeds had been planning a major modernization of its operations; the Pittsburgh Business Efficiency Partnership provided mentoring on energy and environmental efficiency measures that could be part of that process.

- **Reduced Operating Costs** — Mentoring can assess the effectiveness of environmental programs, often identifying operating efficiencies and reducing costs by eliminating wasteful practices. It can help prioritize activities to ensure that proactive initiatives provide the greatest environmental and economic returns. In many cases, reducing waste or upgrading housekeeping can result in operational improvements, lower error rates, reduced cleanup or set-up time, and other business efficiencies.
- **Improved Compliance** — Mentoring can identify where company practices may be in violation of government regulations or the standards or expectations of key stakeholder groups. Many regulatory agencies look favorably at companies that identify problems themselves, especially if they publicly disclose the problems, demonstrate they are working to solve them, and develop management systems to reduce the likelihood of recurrence.
- **Early Identification of Liabilities and Risk** — Mentoring also can help identify practices or situations that could pose future liabilities to a company, such as environmental releases that could endanger the health of employees or the public, and can identify opportunities to solve problems before they result in costly legal actions.
- **Improved Customer Relations** — A growing number of customers — both individual consumers and business-to-business customers — are seeking relationships with companies that demonstrate concern for the environment and society. Mentoring

can help companies demonstrate their environmental stewardship and commitment to social responsibility, increasing the likelihood that they will be viewed by some customers as a supplier of choice.

- **Improved Employee Relations** — Studies show that employees increasingly are drawn to companies that demonstrate environmental stewardship in their communities. That enhances a leadership company's ability to attract and retain valued employees, especially during tight labor markets. Mentoring — and the resulting improvements in environmental performance — can help companies demonstrate their environmental concern to both current and future employees.
- **Enhanced Competencies** — The knowledge gained from mentoring relationships can increase skills and competencies — not just of key individuals but the company as a whole. A competent, confident staff will better understand their role as environmental stewards within the company and will be better able to identify future environmental problems and opportunities.
- **Improved Health and Safety** — Mentoring can identify instances where waste and inefficiencies may be endangering workers' health and safety, or where lower-risk materials may be substituted for toxic materials or used in a way that reduces employees' risk of exposure. Many of these improvement opportunities also may lead to cost reductions through reduced health and fire risks or by limiting an employer's liability.

SUCCESS STORY

BROMLEY PRINTING, INC., based in Minneapolis, Minn., cut its hazardous and solid waste generation by switching chemicals and increasing recycling of various wastes. As a result of mentoring by The John Roberts Company, a larger printer, Bromley also developed environmental management and compliance systems and conducted a voluntary environmental audit of its facility.

Benefits to Mentors. Of course, an investment in mentoring also can yield dividends to mentors. For example:

- **Enhanced Self-Knowledge** — A mentoring relationship can allow opportunities for companies to take a fresh look at themselves. Through the process of sharing information and knowledge with mentees, some companies identify potential areas for improvement in their own operations. Individuals involved with mentoring may similarly sharpen their own professional development through their interactions with other companies.
- **New Growth and Opportunities** — Some companies have reported that their participation in a mentoring program reinvigorated their own environmental efforts, encouraged the growth of new ideas, and provided opportunities for effective networking.
- **Supply Chain Efficiencies** — Companies that provide mentoring to companies in their supply chain often help themselves by improving the efficiency and environmental performance of their suppliers. In some cases, suppliers may find innovative ways to reduce the use of toxic substances, or significantly cut packaging use. Mentoring may reduce suppliers' costs, resulting in savings to their customers.
- **Increased Employee Commitment** — Mentoring programs can engage and energize employees in the mentoring company. In addition to developing employee skills, mentoring programs also can instill or improve employee satisfaction and commitment, both for employees directly involved with mentoring and for others who take pride in their company's environmental leadership.
- **Enhanced Reputation** — Being a mentor can help demonstrate to a variety of stakeholders — customers, regulators, community leaders, the media, and others — a company's commitment to being a responsible corporate citizen and a leader in its community in promoting environmentally responsible practices.

Benefits to Others. Environmental mentoring can benefit others as well. For example:

- **Government regulators** can encourage companies to seek their own means of gaining regulatory compliance. In doing so, regulators can leverage their resources by reducing their oversight of companies working to solve their own environmental challenges, and focus instead on the biggest and most serious polluters.
- **Trade and professional associations** can help spread best practices throughout their professions or sectors, enhancing their value to their members while improving their members' relationships with regulatory agencies.
- **Colleges and universities** can use mentoring as a research and training vehicle for students as well as professionals seeking continuing education. Through mentoring, both students and professionals can gain valuable hands-on job experience while providing tangible bottom-line benefits to companies.

Mentoring relationships vary widely, so it is difficult to describe a “typical” situation. In general, mentoring involves sharing one’s experience and expertise to help others enhance their knowledge and performance. In the environmental arena, mentors can be companies, trade associations, academic institutions, nonprofit organizations, government entities — or partnerships involving any or all of these.

Here are some other basics about mentoring in general, and environmental mentoring in particular:

TYPES OF MENTORING PROGRAMS

Environmental mentoring programs generally fall into one of three program formats, each with their own opportunities and challenges:

- **One-to-one mentoring** involves a single mentor and mentee. It provides the most targeted and tailored assistance, although it can be highly resource-intensive.
- **One-to-many mentoring** involves a single mentoring organization which offers help to numerous companies. It is useful for issues common to an industry or across industries and can reach more companies than one-to-one programs, though it provides less-targeted information.
- **Networking** brings companies and other experts together to share resources, experiences, and knowledge. It is relatively inexpensive and provides the benefits of one-to-one mentoring by facilitating individual mentoring relationships, but is less organized and more difficult to document results.

Mentoring programs also typically fall into one of four areas of focus:

- **Mentoring within an industry** presents an opportunity to tailor information and understand and anticipate issues of importance to mentees, though

competitive issues may arise. This is the model most natural for industry associations.

- **Mentoring across industries** can cross-fertilize innovations and address issues common to many sectors, but it is less able to address specific firms’ technical issues.
- **Mentoring within a supply chain** offers helpful incentives for participation because of interdependent business relationships among a company and its suppliers, though its focus may be limited to the mentor’s specific supplier needs.
- **Mentoring for an environmental issue** offers help related to a specific environmental issue or region — for example, a program focusing on a watershed or air-quality district, or one specifically related to a topic such as solid or hazardous waste reduction.

TYPES OF ASSISTANCE

Mentors can help mentees in a variety of ways. Many help companies comply with regulatory requirements, others provide tools and techniques to go well beyond compliance, and still others transfer or share technology or systems that can improve a company’s performance. In the environmental arena, mentoring programs can provide help with such things as:

- general environmental issues
- regulatory compliance
- pollution prevention
- toxics reduction

	WITHIN AN INDUSTRY	ACROSS SEVERAL INDUSTRIES	WITHIN A SUPPLY CHAIN	ON AN ENVIRONMENTAL ISSUE
ONE TO ONE	John Roberts Co. Large Minnesota printer mentoring other, smaller, local printers.	WasteCap of Massachusetts Nonprofit organization offering individualized help to area businesses.	GM Lean Implementation Large company mentoring its suppliers worldwide.	Sand River Project Phoenix, Ariz.-based utility providing mentoring to smaller companies to help reduce air emissions.
ONE TO MANY	Santa Clara County (Calif.) Pollution Prevention Program Local government program offering specialized workshops to businesses in select industries.	Pittsburgh (Pa.) Business Efficiency Partnership Nonprofit organization offering workshops to firms in its region.	Ford ISO 14001 Training Large company offering training to suppliers on environmental management systems.	Businesses for the Bay Regional partnership offering workshops to business within the Chesapeake Bay watershed.
NETWORKING	ChemAlliance Listserve Informal chemical industry e-mail discussion group that allows individuals to share information or seek answers.	Wisconsin Environmental Initiative Statewide nonprofit group organizes seminars, holds educational and training events, and offers networking opportunities.	General Motors Supplier Environmental Advisory Team Provides a way to address environmental issues cooperatively among GM suppliers worldwide.	Environmental Managers of Maryland Group of professionals interested in improving the performance of their businesses and the quality of life of their region.

- energy efficiency
- recycling and waste reduction
- environmental management systems
- ISO 14000 and other voluntary standards
- environmental design
- new product development
- distribution and marketing

Few programs offer assistance with the full range of environmental, health, and safety issues, with most focusing on just a handful of topics and services that fulfill the mentoring organizations' missions and needs. A mentoring program operated by a group or agency concerned with emissions into a bay, estuary, or watershed may center its mentoring efforts on minimizing water-based emissions. Another program, located in a region with high landfill costs or dwindling disposal space, may focus on ways to dramatically reduce solid waste from packaging and other parts of company operations.

Creating and Operating a Mentoring Program

While business environmental mentoring programs operate in a variety of ways, they typically go through the same basic steps to create and operate their programs:

- **Establish a mission.** The mission of most programs engaging in environmental mentoring flows naturally from the organization's core mission. Companies might wish to "green" their supply chains, or to "give back" to their community or sector. A community group might be interested in improving a watershed. Trade associations may want to provide additional, tangible services to their members. A government agency may seek to encourage the regulated community to go beyond compliance.
- **Define the market and assess the need.** The market for mentoring services is linked directly with the

mission. A company has a given number of suppliers, or resides in a community with a fixed number of companies. A trade association has a membership roster that defines its market. A regulator has a relatively fixed number of companies within its territory. Assessing the needs requires an understanding of such things as what information companies already know, what information they need to know, and their preferred style of learning or interaction.

- **Design the program.** A wide range of questions need to be answered. Among them: How will mentoring take place? In person or over the phone? In groups, or one-to-one? How will mentors and mentees find each other? What costs, requirements, or other qualifications for participation be placed on mentees? What will be the rules of engagement? What incentives will be offered for participation? Will there be follow-up or evaluation of the program's impact or effectiveness?
- **Solicit mentors.** Having an available pool of qualified mentors is the next crucial component. When seeking potential mentors, consider which companies are environmental leaders and which support employee participation in community service programs. It may be helpful to identify local associations of environmental managers that may serve as a ready pool of mentoring talent. Also keep in mind that developing a pool of mentors may require some degree of training — not necessarily on the topic to be mentored, but on how to be an effective mentor.

- **Solicit mentees.** Mentor programs solicit companies in a variety of ways. With company supply chains or trade associations, there are natural lists to use, making direct targeting efforts easier. In other cases, such as when targeting a larger, regulated community, programs typically use public service announcements, workshop presentations, direct mailings and other larger, more general outreach efforts.
- **Establish mentoring relationships.** A successful mentoring relationship requires establishing the rules of engagement and a solid understanding of the expectations and responsibilities of both mentors and mentees.
- **Provide mentoring services.** Mentoring relationships can take place in a variety of ways. Consider what the "story board" or timeline will look like for the mentoring relationship. How will introductions be made? How long will the process take? What will be required of mentors and mentees?
- **Conduct follow-up or assessment.** To be effective over the long term, environmental mentoring programs need to assess their effectiveness by following up with mentees and by trying to evaluate and quantify the tangible results of their efforts.

Each of these components are covered more in-depth in the next section.

This section provides an overview of mentoring program operations, from their early conception and formation through their operations and evaluation. While programs operate in a wide variety of ways — some highly structured, others less structured — mentoring programs share a number of common elements and processes. The information included here is designed to provide a big-picture overview of mentoring program operations, while also serving as a more detailed, hands-on guide for organizations seeking to establish or expand an environmental mentoring program.

The seven principal topics covered here include:

- Developing a Strategy
- Selling the Program
- Designing the Program
- Identifying and Training Mentors
- The Mentor—Mentee Relationship
- Being an Effective Mentor
- Following Up

DEVELOPING A STRATEGY

The first step in creating a mentoring program is to think through the overall program: what it is, how it will work, who the audience is, who will pay for it, and other such issues. This basic plan will become a road map for all of the subsequent steps.

Among the issues to consider are:

What is the program's mission?

The decision to engage in environmental mentoring typically stems from an organization's mission, vision, or values, although some arise from pure bottom-line objectives. In creating a mentoring program, a critical step is to understand and articulate the program's motivating forces in the form of a mission statement. This statement may be used both internally — to develop self-understanding about what the program intends to accomplish — and externally — to communicate the program's goals to others. The mission statement also will become the basis for evaluating

and assessing whether and how a mentoring program is meeting its goals. Several example statements appear on page 13.

A mission statement should reflect the overall goals of mentoring, including what the program hopes to accomplish and how it plans to accomplish it. Ideally, it should reflect both the factual goals as well as the spirit. A well-crafted statement can appear on Web sites, brochures, and other promotional materials to succinctly describe a mentoring program.

Who is the audience?

Often, the answer to this question is dictated by the nature of the sponsoring organization. For example, a mentoring program from a trade association is likely to target companies in its sector. A program from a government agency will probably cover companies in that agency's jurisdiction. A company-sponsored

SAMPLE MISSION STATEMENTS

“ To promote sustainable economic development, a cleaner environment, and a better quality of life for all citizens by providing waste reduction, pollution prevention, and technology transfer assistance and education to businesses, industries, communities, and governmental entities.”

Alabama Waste Reduction and Technology Transfer Foundation

“ Provides assistance to area businesses and recognition for their accomplishments. Resource experts from the City of Portland’s Energy, Water, and Environmental Services Bureaus help businesses learn the latest on pollution prevention, energy efficiency, waste reduction, and water efficiency.”

Businesses for an Environmentally Sustainable Tomorrow (BEST), Oregon

“ Delivers expert, hands-on technical, business, and training services to manufacturers and other partners. CAMP’s mission is to motivate and help regional manufacturers become more competitive. CAMP’s goal is to be No. 1 in our customers’ minds when seeking assistance to become more competitive.”

Cleveland Advanced Manufacturing Program (CAMP)

“ To provide the citizens and businesses of Southeastern Florida with a discrete and easily accessible location for obtaining information, guidance, and contacts for pollution prevention and waste reduction practices. This is accomplished through the use of this Internet page and the links provided within.”

Florida Center for Environmental Studies and the Pollution Prevention Coalition

“ A professional organization dedicated to promoting information exchange and networking to pollution prevention [P2] professionals in the Great Lakes regions of the U.S. and Canada. Our services include: summer and winter meeting opportunities, information exchange list servers, publications, and a guide to on line P2 information in the region. All services are free to members of the Great Lakes P2 community.”

Great Lakes Regional Pollution Prevention Roundtable

mentoring effort may target other companies in its region, or its suppliers, or other members of its industry. Some programs are highly focused — a government program for metal finishing and dye-casting companies with under 50 employees in a three-county region, for example.

But not all programs are so well defined. Some are national in scope, open to nearly any type of business. Others target small and midsized companies, broadly defined to exclude only a relative handful of firms.

The answer to this question also may be dictated by resources. Obviously, the larger the potential audience, the greater the resources — time, money, and people — required to reach them and provide mentoring services.

What does the audience know — and need to know?

It is helpful to assess the knowledge and needs of the potential audience. For example, what’s driving the need for mentoring? Is it a new regulation (or an existing regulation that remains largely unmet)? Is it a pressing local environmental issue, such as air pollution or water quality? Are citizens, consumers, activists, or the media pressing companies to take more proactive measures?

How knowledgeable is the audience already? Are companies generally aware of environmental issues affecting them and already taking some proactive measures, or is this largely new for them? What other resources already exist to help these companies?

Continued on page 15



	WITHIN AN INDUSTRY	ACROSS SEVERAL INDUSTRIES	WITHIN A SUPPLY CHAIN	ON AN ENVIRONMENTAL ISSUE
ONE TO ONE	<p>Advantages: Ability to deliver highly targeted and tailored information specific to an individual company.</p> <p>Disadvantages: Highly labor and time intensive.</p> <p>Resource Needs: High</p>	<p>Advantages: Ability to address highly targeted and tailored information specific to an individual company.</p> <p>Disadvantages: Highly labor and time intensive; requires detailed technical knowledge of a range of sectors.</p> <p>Resource Needs: Very high</p>	<p>Advantages: Ability to deliver highly targeted and tailored information specific to an individual company and of value to both supplier and customer.</p> <p>Disadvantages: Highly labor and time intensive.</p> <p>Resource Needs: Medium high</p>	<p>Advantages: Ability to deliver highly targeted and tailored information specific to a shared and highly visible challenge or issue.</p> <p>Disadvantages: Highly labor and time intensive; may require detailed technical knowledge of a range of sectors.</p> <p>Resource Needs: Very high</p>
ONE TO MANY	<p>Advantages: Ability to share information with multiple companies with similar interests and to showcase industry-specific technologies and best practices.</p> <p>Disadvantages: More difficult to tailor information to address individual company needs.</p> <p>Resource Needs: Medium</p>	<p>Advantages: Ability to share information with multiple companies across a variety of sectors, reaching a potentially large number of companies.</p> <p>Disadvantages: Information must be more general in nature, or sector-specific information must be prepared for several industries.</p> <p>Resource Needs: Medium high</p>	<p>Advantages: Ability to reach multiple companies with targeted and tailored information of value to both supplier and customer.</p> <p>Disadvantages: More difficult to tailor information to address individual company needs.</p> <p>Resource Needs: Medium</p>	<p>Advantages: Ability to reach several companies with targeted and tailored information on an issue affecting several companies in the same region.</p> <p>Disadvantages: Information must be more general in nature due to differences among industries.</p> <p>Resource Needs: Medium</p>
NETWORKING	<p>Advantages: Allows companies with similar interests and needs to self-organize mentoring; programs are most likely to self-perpetuate.</p> <p>Disadvantages: Outreach efforts are more hit-and-miss and requires more initiative on the part of companies to participate, and to find information they need.</p> <p>Resource Needs: Low</p>	<p>Advantages: Allows companies with similar interests and needs to self-organize mentoring; programs are most likely to self-perpetuate.</p> <p>Disadvantages: Outreach efforts are more hit-and-miss and require more initiative on the part of companies to participate; involvement of multiple sectors makes it even more challenging for firms to find information they need.</p> <p>Resource Needs: Medium</p>	<p>Advantages: Allows companies with similar interests and needs to self-organize. Direct involvement of principal customer will likely increase participation and involvement.</p> <p>Disadvantages: Outreach efforts are more hit-and-miss and requires more initiative on the part of companies to participate, and to find information they need.</p> <p>Resource Needs: Low</p>	<p>Advantages: Allows companies interested in addressing a regional or local problem to self-organize.</p> <p>Disadvantages: Outreach efforts may be more hit-and-miss and requires more initiative on the part of companies to participate.</p> <p>Resource Needs: Medium</p>

What do companies need or want to know? How will you assess mentees' knowledge and needs? For example, are they most interested in learning how to comply with existing regulations, or in techniques that can take them well beyond compliance by dramatically reducing their environmental impact through pollution prevention, waste reduction, energy efficiency, and the like? Do companies in the potential audience require the same types of information (most likely if all companies are within the same industry) or different types? What level of technical expertise does the audience have?

The answers to these and related questions will play a significant role in shaping the program. Among other things, it will determine the types of individuals to recruit as mentors as well as the types of educational materials and tools that should be used to assist mentors in working with companies.

How should mentoring take place?

As described earlier, there are four principal styles of mentoring — one-to-one, one-to-many, networking, and within an environmental issue — and three types of audiences — within an industry, across several industries, and within a supply chain. Each of these has its own advantages, disadvantages, and resource needs.

How will the audience be reached?

The success of the mentoring program will hinge in part on the ability to identify and communicate with the potential audience. In general, the more specific means that exist to target an audience, the more cost-effective the program will be. For example, it will be much easier and less expensive to reach targeted companies if the majority of them belong to a handful of trade associations or other organizations, attend the same annual conferences, or subscribe to the same publications. In contrast, using individual mailings or telemarketing, or promoting the program through such scatter-shot means as newspapers, radio advertisements, or other mass media outlets, typically is more expensive and less effective.

It may be helpful to identify specific organizations, publications, events, and other means through which to reach the potential audience. Each may offer opportu-

nities to place articles, public-service ads, or paid ads; make presentations; piggyback on existing mailings; set up informational booths or tables; or conduct other appropriate types of outreach.

How will the mentors be identified?

Another key consideration is how to identify and recruit qualified mentors. Because many mentors are unpaid volunteers, attracting and retaining individuals with the knowledge and skills to be effective mentors can be a significant challenge for mentoring programs. This is less of a problem in cases where mentors come from the ranks of paid staff at companies, associations, agencies, or other organizations. It may be helpful to identify early on specific organizations from which mentors will be recruited, assessed, trained, and evaluated. Also important is identifying ways to get recognition for mentors' efforts, whether within their companies or organizations, or within the community at large.

Don't overlook training. While individual mentors are likely experts in specific technical or operational areas, they may not be current with new developments, technologies, or resources that could be of use in their mentoring roles. It also is likely they will need training in how to be an effective mentor (discussed elsewhere in this handbook). In general, mentors should have a general roadmap of how things will progress.

It may be appropriate to hold training sessions for mentors, as well as networking meetings at which mentors can share experiences and expertise. Consider recruiting former mentees to become mentors.

What are the program costs?

Mentoring programs can be conducted inexpensively, but usually require some modest funding to cover staffing, marketing materials, and other direct costs. Often, these costs are minimal, especially when a mentoring program is created within an existing company, organization, or agency, utilizing existing facilities, staff, and other resources. Still, it is important to identify all of the program's potential costs and determine how they will be funded. This also may help determine whether mentoring services can be offered at no charge to mentees, or whether fees will be assessed

for mentoring services. (Logic would dictate that free mentoring services are much more widely utilized than those that charge a fee, even a modest one)

Among the costs to consider:

- Organizational start-up costs
- Office costs: rent, telephone, supplies, furnishings, computers, etc.
- Staff salaries and benefits
- Editorial, design, and printing of promotional and educational materials
- Advertising
- Public relations
- Booths, displays, or other on-site promotional materials
- World Wide Web site design, programming, and maintenance
- Mailing costs of promotional materials
- Events and meetings: facilities, refreshments, etc.
- Reimbursement for mentor travel expenses

How will the program measure success?

It is important to assess the effectiveness of mentoring programs for a variety of reasons: to be accountable to sponsors, to assess the effectiveness of various types of mentoring services, to gauge the environmental and economic impact of mentees' actions as a result of the program, and to assess the performance of individual mentors.

Program assessments are conducted in a wide range of ways — some formal, others informal — based on each individual program's needs. Specific evaluation examples and criteria may be found in the section on Following Up.

Checklist: Developing a Strategy

PROGRAM MISSION

Create a brief but succinct mission statement, including:

- ✓ Goals and objectives
- ✓ Target audience
- ✓ Sponsors and their motivation
- ✓ Spirit of the program

Audience: Who is the audience?

- ✓ Companies within a single industry
- ✓ Companies within several industries
- ✓ Companies that are our suppliers
- ✓ Companies that are in our region

Where are they located?

- ✓ In a single region
- ✓ Within 500 miles
- ✓ Within the United States
- ✓ Around the world

How does the audience currently receive information?

- ✓ Trade publications
- ✓ Web sites
- ✓ Nonprofit organizations
- ✓ Workshops and conferences
- ✓ Networking events
- ✓ Individual contacts
- ✓ Other (be specific)

How can they be reached?

- ✓ Trade associations (list specific organizations)
- ✓ Trade publications and professional journals
- ✓ General publications
- ✓ Vendors and sales reps
- ✓ TV and radio promotion
- ✓ Direct mailings
- ✓ World Wide Web site
- ✓ Key industry events
- ✓ Other business events (be specific)

KEY ISSUES

Specific Environmental Challenges

- ✓ Air emissions
- ✓ Water emissions
- ✓ Solid waste
- ✓ Hazardous waste
- ✓ Other (describe)

Specific Business Challenges

- ✓ Regulatory compliance
- ✓ Pollution prevention
- ✓ Energy efficiency
- ✓ Solid waste reduction
- ✓ Environmental management systems
- ✓ New product innovation
- ✓ Other (describe)

ORGANIZATIONAL ISSUES

How should mentoring take place?

- ✓ One-to-one
- ✓ One-to-many
- ✓ Networking
- ✓ Within an industry
- ✓ Across several industries
- ✓ Within a supply chain

From where will the mentors be recruited?

- ✓ Leadership companies (list specific companies)
- ✓ Government experts (list specific agencies)
- ✓ Local colleges (list specific colleges)
- ✓ Private consultancies (list specific firms)
- ✓ Nonprofit organizations (list specific organizations)

How will mentors be evaluated?

- ✓ Emissions or waste reductions
- ✓ Number of action items implemented
- ✓ Number of improvements made
- ✓ Cost savings
- ✓ Customer satisfaction
- ✓ Other (be specific)

What are the anticipated program costs?

- ✓ Start-up costs
- ✓ Office costs: rent, telephone, supplies, furnishings, computers, etc.
- ✓ Staff salaries and benefits
- ✓ Editorial, design, and printing of printed materials
- ✓ Advertising
- ✓ Public relations
- ✓ Booths, displays, other on-site promotional materials
- ✓ Web site design, programming, and maintenance
- ✓ Mailing costs of promotional materials
- ✓ Events and meetings: facilities, refreshments, etc.
- ✓ Reimbursement for mentor travel expenses
- ✓ Other (be specific)



As stated earlier, there is no one-size-fits-all environmental mentoring program. To be effective, a mentoring program should tailor its services and products to reflect the program's mission, the needs of the target audience, and the program's available resources. This section provides an overview of the key types of mentoring programs and services, as well as other considerations when designing a program.

TYPE OF SERVICES

An environmental mentoring program can include any or all of the following types of services:

Site visits. There's no substitute for being there in person, which is why a large number of mentoring programs send experts inside a company's facility to observe operations and provide feedback and assistance. This is also the best way to deliver information that is highly tailored to the mentee's needs and circumstances. More often than not, site visits reveal opportunities for improvements and changes to a company's operations that would have been hard to identify at a distance.

In many cases, site visits are only one part of a mentoring relationship. Visits may be followed up with telephone consultations and e-mail or letter exchanges, for example. In addition, the mentoring relationship may include workshops or networking events, or providing information, tools, publications, or other resources through a World Wide Web site.

Telephone consulting. Setting up a telephone "hotline" to answer questions is a cost-effective means of providing mentoring services to a large number of companies. Hotlines can operate in a number of ways. One is to have knowledgeable staff available to answer questions directly to callers. Such hotlines may operate only a few hours a day or a few days a week to make the most efficient use of experts' time. Another technique is telephone referral, in which callers talk to a generalist or administrative staffer, who refers the caller to an expert who has agreed to be "on call." The expert then calls back the mentee and provides consul-

tion. If appropriate, the telephone mentoring could lead to a site visit or other in-person consulting.

Telephone consulting services are a highly cost-effective means of providing person-to-person mentoring without having to visit facilities. Of course, the inability of mentors to see firsthand a mentee's facility and operations may limit the mentor's ability to have an impact. But telephone consulting may be sufficient for many companies that merely need some simple advice on getting started or finding additional sources of help.

Web-based resources. The 24-hour/seven-day-a-week nature of the World Wide Web makes it an ideal means for distributing information that may be useful to a wide number of companies. Many mentoring programs have utilized the Web as a cost-efficient publishing tool, allowing them to promote their programs, publish a variety of types of information, and offer additional sources of help. Much like a telephone consulting service, the Web is ideal for offering general advice and referrals to additional sources of help. The linking nature of the Web also provides the ability for mentoring organizations to connect users directly with local, state, and national government agencies, trade associations, nonprofit groups, and other mentoring programs which offer different services.

Other Internet resources. Other Internet-related tools include listserves (group mailing lists that enable participants to query and address one another via e-mail); e-mail-based question-and-answer forums; and e-mail notification of new developments, resources, best practices, and other useful information. Some of these may require special software (often available from a systems manager or through an Internet Service Provider), though the costs are minimal.

Resource library. In this increasingly "virtual" world of the Internet, it seems almost quaintly old-fashioned to have a reading room filled with good reference sources, but such "brick-and-mortar" resource libraries can provide a wealth of knowledge and resources. Unlike Web-based resource centers, a physical resource

library is more likely to contain endless reference books offering detailed technical information on a range of topics. Current and back issues of periodicals — newsletters, magazines, professional journals, and product catalogs — are other valuable resources that are more easily accessed offline.

A resource library need not be limited to printed materials. It also can contain product samples — such as those made from recycled materials or containing other environmentally preferable characteristics — allowing visitors to inspect them firsthand. And a physical library can contain one or more computer terminals along with instructions directing users to Web sites they may want to visit.

Workshops. In-person workshops are a highly effective means of mentoring groups of companies — or groups of people from the same company — on any of a wide range of environmental topics. Workshops may be held directly at company facilities or in a conference center or other venues. Such workshops often have specific topics and agendas — perhaps dealing with new developments or technologies in a specific sector. Others focus across sectors to deal with issues such as regulatory compliance, energy efficiency, pollution prevention, waste reduction, and green purchasing. Some mentoring workshops are even more general in nature, giving attendees basic information about such things as the bottom-line value of going beyond regulatory compliance.

Workshops need not be stand-alone events. It may be more cost-effective to piggyback a mentoring workshop with a conference or other event likely to draw members of the target audience. Organizers of such events may welcome a mentoring workshop as a value-added component of their own event.

Besides educating groups of people at the same time, workshops can have a secondary purpose: They can promote other types of mentoring, especially site visits, and serve as a recruiting opportunity for attracting companies needing more individualized assistance. Workshops also may be combined with networking (see below), encouraging attendees to meet one another and develop opportunities to share information and resources.

Networking events. Like workshops, networking events allow mentoring programs to address group audiences. But instead of mostly one-way communication in the form of a workshop presentation, a networking event helps participants to meet and engage one another to share resources and experiences.

This does not always happen naturally. Putting groups of people together in the same room — even those who live in the same community or work in the same industry — does not guarantee they will interact, let alone help one another. To be effective, a networking event requires that the hosts set the stage. Many networking events are combined with brief workshops, presentations, or group discussions, followed by more free-form networking. Networking can be facilitated through such means as dividing participants into smaller groups and placing them at tables or in breakout rooms along with a facilitator. But effective networking also can take place in less structured ways, requiring only modest refreshments and name tags.

Printed materials. Brochures, reports, fact sheets, booklets, and other printed materials are a cost-effective means to mentor large groups of people. Such materials can vary widely in topic, tone, and technical content. Examples include:

- tip sheets, offering simple briefings on general or specific topics
- detailed, sector-specific materials offering hands-on guidance
- workbooks, checklists, and self-assessment tools
- resource directories containing references to products, services, and organizations
- newsletters with updates, tips, and success stories
- reprints of articles of interest from other publications (with permission, of course)
- compilations of any or all of the above

These and other materials can be distributed in print or, to save paper and facilitate distribution, in electronic formats via e-mail and through a Web site. In addition, they may be used to supplement other mentoring activities — site visits, telephone consultations, resource library, workshops, etc. — and can serve as promotional materials for the mentoring program at conferences and other events.

In addition to original materials, there are many tools, software programs, brochures, and other publications available from the U.S. EPA or state environmental offices (as well as nonprofit organizations), which can be made available to mentoring programs in large quantities to distribute to companies. In fact, such organizations may welcome the opportunity to get assistance in distributing their materials.

TYPES OF ASSISTANCE

Just as there are many types of delivery mechanisms for mentoring, there also are a variety of types of assistance that programs can offer. Here are brief descriptions of some of the most common topics.

General assistance. This broadest type of mentoring helps companies understand the environmental impact of their operations and assess the opportunities to improve their financial performance while reducing their environmental impact. Such assistance can cover the full range of environmental topics, with an emphasis on broad, general areas that affect a large number of companies. Topics may include:

- achieving regulatory compliance
- going beyond compliance to improve both the environment and the bottom line
- general information about pollution prevention, waste reduction, and energy efficiency
- reducing the use of toxic substances and materials
- buying recycled and other “green procurement” issues

Regulatory compliance. Many mentoring programs, especially those hosted or sponsored by government entities, focus on helping companies meet or exceed regulatory requirements. Such assistance is most common to smaller firms whose resources are limited and who frequently lack full-time environmental professionals. Compliance-oriented mentoring can help assess where a company may not be in compliance, and can also identify opportunities for additional environmental improvements, cost savings or other efficiencies. It also can help smaller companies determine what they can and cannot do in-house and when they need to bring in outside consultants.

Application assistance. Many businesses, especially smaller ones, can benefit from assistance in filling out

applications for new facilities, as well as those required by the Clean Air Act and other federal and state regulations. Much of this type of mentoring can be done over the telephone (possibly supplemented with faxing documents), or in the offices of either the mentee or the mentoring organization.

Pre-permitting assistance. Both small and large companies can benefit from meetings to explain the permitting requirements and the application process for new or expanded facilities. Again, such mentoring can take place over the phone or in either party’s place of business.

Pollution prevention. P2, as it is often called, looks at the front-end of operations to identify opportunities to reduce emissions in the first place, rather than deal with it once they have been created. Many companies have yielded significant financial savings by identifying the “low-hanging fruit” — that is, aspects of their operations where a few simple changes can yield dramatic improvements. There is a wealth of existing research, resources, and experience related to pollution prevention, much of it sector-specific, which can be used in P2 mentoring.

Energy efficiency. Most companies use energy inefficiently, wasting money and contributing to the emission of global-warming gases and other pollutants created in generating most types of energy. Energy-efficiency mentoring identifies opportunities for equipment changes and operational improvements that can reduce costs by using energy more wisely. Such mentoring can help companies calculate the return on investment for energy-efficient machines, motors, controls, lighting, heating and cooling systems, and other products and processes, and can show how energy efficiency can yield additional dividends through productivity improvements, reduced error rates and defects, and other efficiencies.

Waste reduction. Mentoring on this topic can cover a wide range of topics, but usually focuses on solid waste, from packaging trash to sludges, residues, contaminated solvents, and the myriad outputs of manufacturing, repair services, and many other types of businesses. As with P2 and energy efficiency, mentoring on this topic typically has direct bottom-line benefits to companies through reducing disposal costs, raw material costs, and reporting requirements.

OVERVIEW OF MENTORING PROGRAM OPPORTUNITIES

Designing a mentoring program requires sorting through a variety of possibilities covering the various types of mentoring relationships, as well as the types of services and assistance to be offered.

Types of Mentoring

- One-to-One
- One-to-Many
- Networking

Types of Companies

- Within an Industry
- Across Several Industries
- Within a Supply Chain
- On an Environmental Issue

Types of Services

- Site Visits
- Telephone Consulting
- Web-based Resources
- Resource Library
- Workshops
- Networking Events
- Printed guides, checklists, handbooks, etc.

Type of Assistance

- General Assistance
- Regulatory Compliance
- Pollution Prevention
- Energy Efficiency
- Toxics Reduction
- Environmental Management Systems
- Design for Environment
- Marketing and Sales
- Distribution

Toxics reduction. This type of mentoring helps companies reduce emissions of toxic substances into the air, water, and soil through the use of alternative products and process improvements. Such mentoring also can help companies understand the additional benefits that can come from toxics reduction, including cost savings, reduced worker exposure and health problems, and lower regulatory burden.

Environmental management systems. These mentoring programs can help companies develop and improve their existing environmental management systems, or EMS. An EMS helps guide a company through environmental matters, including such things as creating an environmental policy, setting objectives and targets, implementing a program to achieve those objectives, monitoring and measuring environmental programs, correcting problems, and engendering continuous improvement. Many companies, especially midsized and larger ones, are developing EMS that are compliant with the ISO 14001 standard. A growing number of multinational companies are requiring that their suppliers are certified as meeting ISO 14001 requirements.

Design for the environment. A growing number of companies seeking to gain competitive advantage through environmental measures are using environmental design principles (often referred to as DfE, for “design for environment”) to guide them in creating new products or improving existing ones. DfE considers the full life-cycle of a product, including its raw materials, its manufacturing process, its use, and what

happens to it at the end of its useful life. DfE mentoring programs, while still relatively rare, can help companies interested in environmental design issues gain the experience of those that already have had success in these areas.

Marketing and sales. One key issue for companies is how to translate their improved environmental performance into increased sales in the marketplace, or at least recognition by their customers and potential customers that they are an environmental leader. Marketing mentoring can help reward proactive companies by linking them with consumers and businesses seeking products and services from environmentally responsible companies. Some mentoring programs, especially those connected with local government entities, include award and recognition components that honor proactive companies; some also help promote leadership companies to the public through brochures and advertisements.

Distribution. The environmental impacts of product transportation and distribution is a relatively new topic for most companies, but addressing it can have a significant environmental impact. Included here are the environmental impacts of packaging, and the energy involved with shipping goods.

OTHER PROGRAM DESIGN ISSUES

Among the other key issues to consider when designing a mentoring program:

- **Eligibility.** It is important to determine exactly what types of businesses will be eligible for a mentoring program. Sometimes this is easy: companies in a specific sector, members of an organization, companies in a particular region, or suppliers of a particular company. In other cases, it is necessary to establish guidelines for eligibility, such as company size (measured in revenue, number of employees, number of facilities, etc.) or geography (companies based in specific cities, counties, or states, or those with facilities within a fixed distance from the program headquarters, for example). Eligibility criteria should be made clear and explicit in all program communications.
- **Fees.** Most programs offer their services at no cost to mentees, though others require modest fees to help cover expenses. Still others offer basic services at no fee but charge for expanded or enhanced services.
- **Sponsorship.** A mentoring program's sponsorship can affect its image, public perception, and success. For example, some businesses may be reluctant to engage mentoring sponsored by government programs out of fear that information gained during site assessments may be used for enforcement purposes. On the other hand, programs sponsored by nonprofit organizations may be seen as being aligned with activists. While many programs do not have a choice in how they are sponsored, there may be options available — such as multisector partnerships — that may be worth considering during a program's development stage.
- **Confidentiality and liability.** These issues, described later in this handbook, also should be carefully considered at this point.

Checklist: Designing the Program

TYPES OF SERVICES

- ✓ Site visits
- ✓ Telephone consulting
- ✓ Web-based resources
- ✓ Resource library
- ✓ Workshops
- ✓ Networking events
- ✓ Printed materials
- ✓ Others (be specific)

TYPES OF ASSISTANCE

- ✓ General assistance
- ✓ Regulatory compliance
- ✓ Application assistance
- ✓ Pre-permitting assistance
- ✓ Pollution prevention
- ✓ Energy efficiency
- ✓ Waste reduction
- ✓ Toxics reduction

- ✓ Environmental Management Systems
- ✓ Design for the environment
- ✓ Marketing and sales
- ✓ Distribution

OTHER PROGRAM DESIGN ISSUES

Eligibility

- ✓ Types of businesses
- ✓ Sizes of businesses
- ✓ Revenue
- ✓ Number of employees
- ✓ Number of facilities
- ✓ Geographic region (be specific)
- ✓ Other factors (be specific)

Fees

- ✓ Will fees be charged for mentoring?
- ✓ If so, describe fee structure



Developing a mentoring program isn't a mere matter of "If you build it, they will come." Effectively reaching a program's intended audience — whether a highly targeted audience or a broad, general one — requires a great deal of planning and careful execution. To succeed, promotion and marketing must be an ongoing and highly valued part of a program's strategy.

Mentoring is a new concept for many companies, particularly in the area of environmental performance. The idea of having "outsiders" come into the company to offer advice — whether they come from the private sector, government, trade associations, or nonprofits — can be unsettling to companies, particularly small and mid-sized ones that are most comfortable doing things in their own, time-tested fashion and may be most resistant to change. (This is especially true of mentoring programs sponsored by regulatory agencies, even when it is made clear that government mentors are not there to find violations they observe during on-site visits.) Even though the advice may be free, with no obligation, and offered in a colleague-to-colleague, nonthreatening fashion, some professionals still may be leery of receiving such assistance, even when they know it could provide valuable help.

On the other hand, some potential mentees may have unreasonable expectations about what mentoring can do for their companies. They may expect mentors to come in and "fix" their problems for them so that they don't have to do it themselves. They may believe free mentoring assistance is a substitute for the consulting typically offered by for-profit consultants. While this may sometimes be the case, it isn't usually true.

To help overcome such issues and to effectively promote the program, it is critical that promotional materials be clear and comprehensive, explaining how a program works and what a mentee can expect.

Of course, not every type of communication can or should be comprehensive. Some promotional efforts may simply have a few words along with a phone number or Web site address.

In considering how to market a mentoring program's services, it may be helpful to consider some of the classic public relations and marketing strategies. Here are some things to consider:

Define and understand the audience. It isn't necessarily enough to know that the audience you are trying to reach are "business people." That's too general a term — business people, after all, are merely people at work, with all the diversity of interests that implies. Define the audience as specifically as possible: managers of industrial facilities; environmental managers in metal finishing plants; anyone in a manufacturing facility who handles chemicals; and so on.

Defining the audience is just the beginning. Even more important is to understand the audience: Where do they currently turn for technical and professional assistance? What organizations do they belong to? What publications do they read? What events or conferences do they attend? In what types of settings do they typically interact with their colleagues?

Create the messages. Advertising and marketing pros call this the USP, or "unique selling proposition" — what, precisely, you are offering your audience. In the case of environmental mentoring, the USP is any or all of the benefits of mentoring listed earlier (see "How Mentoring Can Help," page 6). In short, they include such things as:

- reduced operating costs
- improved regulatory compliance
- early identification of potential liabilities
- improved customer relations
- improved ability to attract and retain employees
- enhanced organizational competencies
- improved worker health and safety

In effect, these are what a mentoring program is "selling" — not free technical assistance or consulting, even though that's what the service really is.

[Example of a mentoring workshop agenda and flyer.]

ISO 14001 Awareness Education Seminar

AGENDA

Indianapolis Marriott Hotel (I-465 & Shadeland) March 8, 1999

TIME	ACTIVITY
7:30-8:00	Registration and Continental Breakfast
8:00-9:15	Welcome & ISO 14001 Overview---Joe Phillips Manager, BMTs Quality Services
9:15-9:30	Break
9:30-10:00	Our ISO 14001 Journey---Tom Kolbus Environmental Control Specialist, Visteon Automotive Systems (Ford)
10:00-10:45	Question & Answer Session I
10:45-11:00	Break
11:00-12:00	Question & Answer Session II

During the ISO 14001 Overview and Our ISO 14001 Journey” portion of the program, **write your questions** on 3” x 5” cards.

Then, a moderated panel composed of panelists from registered companies, ISO 14001 consultants, ISO 14001 registrars, and a representative from Indiana Department of Environmental Management (IDEM) will answer your questions.

The point is that all marketing materials should revolve around a few key messages that focus on the direct and indirect value of mentoring services to the customer.

For example:

- “Everything you need to know to cut your environmental compliance costs.”
- “Free help to raise your environmental profile while cutting your costs.”

- “Need ISO 14001 help? Call us first.”
- “Is your company facing section 112(b) air permitting regulations?”

Be diverse. While key messages should be consistent, the use of media should be diverse. It usually is not effective to rely on a small handful of publications, web sites, and other promotional opportunities. Media professionals understand that while a single ad or

article can motivate some customers, it usually isn't that easy. Effective marketing results from getting a message out through a variety of means over a sustained period of time. Consider any or all of the following:

- Brochures
- Press releases
- Educational materials
- Web sites
- Links from other Web sites
- Promotional mailings
- Promotional e-mailings
- E-mail discussion groups (listserves)
- Telephone marketing
- Articles in professional journals
- Articles in business publications
- Articles in general interest publications
- Events hosted by the mentoring organization
- Presentations given at other events
- Exhibits at trade shows
- Radio, TV, and print public service advertisements
- Personal recommendations by satisfied customers

In general, it is most cost-effective to piggyback marketing efforts with other organizations that already reach the same target audience. For example, a trade association that has a publication, Web site, meetings, or regular mailings to members is a natural ally. So are events attended by significant numbers of the target audience. Still another option is to use existing client lists of vendors or salespeople, if they are available.

Also keep in mind that marketing needn't be principally in the form of selling. Educational events and materials are other effective ways to promote a mentoring program. Some mentoring programs, for example, hold workshops on a topic of interest to companies they are targeting — how to reduce wastewater emissions, for example, or how to create an effective environmental management system. Such events can simultaneously

utilize all three forms of mentoring: one-to-one (by inviting companies to engage in individualized mentoring relationships), one-to-many (by educating numerous companies simultaneously at the event itself), and networking (by bringing companies together for the event and allowing them to interact). Besides helping promote a mentoring program, such events help programs establish credibility within the business community.

Published materials are another effective way to generate publicity while furthering an organizational mission. Instructional fact sheets, self-assessment tools, and hands-on handbooks can simultaneously educate while promoting the program, and tend to have longer shelf-lives than conventional flyers, postcards, brochures, or other similar promotional materials.

Form alliances. Partnerships with other organizations is another way to cost-effectively get the word out to companies about an environmental mentoring program. For example, an alliance with a chamber of commerce, trade association, or other business group can provide valuable services to its members while providing the mentoring program with access to a targeted population. Government agencies, Rotary clubs, and individual businesses represent other appropriate alliance partners.

Enlist others. As most companies know well, the best, most credible marketer is a satisfied customer. That is especially true in environmental mentoring, where potential customers may be wary of engaging outsiders for help. Get letters from companies that have benefited from environmental mentoring and get permission to reprint or quote from the letters. Ask satisfied customers if they would be willing to serve as references. Better yet, enlist past customers as presenters at conferences or industry events. Ask them to talk about their mentoring experiences and the knowledge and business value they gained from the process.

Checklist: Selling the Program

DEFINE THE AUDIENCE

- ✓ Which are the companies worth targeting?
- ✓ Who are the people inside the targeted companies who are most likely to engage mentors?
- ✓ Where do they currently turn to for information?
- ✓ What organizations do they belong to?
- ✓ What publications do they read?
- ✓ What events or conferences do they attend?
- ✓ Where do they typically interact with their colleagues?
- ✓ Other key considerations (be specific)

CREATE THE MESSAGES

- ✓ What is the program's unique selling proposition
- ✓ Describe the program using business value terms:
 - ✓ Reduced costs
 - ✓ Improved compliance
 - ✓ Identification of liabilities
 - ✓ Improved customer relations
- ✓ What is the program's unique selling proposition
- ✓ Improved ability to attract and retain employees
- ✓ Enhanced organizational competencies
- ✓ Improved worker health and safety
- ✓ Others (be specific)

USE DIVERSE COMMUNICATIONS TOOLS

- ✓ Brochures
- ✓ Press releases
- ✓ Educational materials
- ✓ Web sites
- ✓ Links from others' Web sites
- ✓ Promotional mailings
- ✓ Promotional e-mailings
- ✓ E-mail discussion groups
- ✓ Telephone marketing
- ✓ Articles in professional journals
- ✓ Articles in business publications
- ✓ Articles in general interest publications
- ✓ Events hosted by the mentoring organization
- ✓ Presentations given at others' events
- ✓ Exhibits at trade shows
- ✓ Radio, TV, and print public service advertisements
- ✓ Personal recommendations by satisfied customers



Not everyone is a natural-born mentor. Although it would make sense that a smart, articulate, and outgoing individual is a logical choice to be an effective mentor — or that a more reserved individual is less likely to be as effective — that isn't always the case. The fact is, almost any type of personality has the potential to be an effective (or ineffective) mentor. Personality has relatively little to do with effective mentoring. Experience, as they say, is the best teacher, and it also makes for the best mentors.

Identifying and recruiting experienced professionals to serve as mentors is an ongoing challenge for many programs. Those with the most knowledge and experience to share typically are in great demand, whether within their own organizations or as paid consultants. Recruiting such individuals to volunteer to offer sage wisdom to others (possibly including their competitors) may be a tough sale.

Mentoring programs solicit mentors from the same pools that they solicit mentees. Programs that are part of company supply chains find mentors within the host company's environmental staff. Those originating within trade associations find mentors from within companies with more robust environmental, health, and safety programs. Government-based programs may solicit mentors from among agency staff, or from within the regulated community.

Other sources of potential mentors include:

- **Retirees.** Many environmental professionals end their careers with a vast storehouse of knowledge and experience. Many are enthusiastically willing to share this bounty with other, younger or less-experienced members of their profession. Retirees may be found from within the ranks of trade associations as well as through companies themselves.
- **Former mentees.** It is not uncommon for former mentees to become mentors. For many, it is a way to "give back" to the program that helped them. Consider asking mentees whether they would be willing to participate. This may best be done through

a post-mentoring follow-up assessment or other communication. (See "Following Up," page 43.)

- **Students.** Some community colleges give academic credit to students — either individually or in groups — that provide technical assistance to companies. Students may lack the experience of other mentors, but still can provide value to companies by offering a fresh look at an operation through the eyes of outsiders. (Moreover, students don't always lack experience — many community college students are current professionals seeking continuing education.) And because academic programs typically teach state-of-the-art technologies and practices, student mentors may bring a wealth of current knowledge that a company may be lacking.

ENCOURAGING VOLUNTEERS

In some cases, individuals need encouragement or incentive to participate as mentors. After all, they have jobs to do, and mentoring may mean they will have to do the same work in less time. Some individuals may view mentoring as an exciting diversion; others may view it as an annoying disruption.

Here are some suggestions for encouraging individuals to participate in mentoring programs.

- **Get top management support.** Individuals are more likely to participate if they know their efforts are being encouraged and supported by top management.
- **Engage middle managers.** Even where top management supports volunteer mentoring, it can be thwarted by direct supervisors and managers who view it as a disruption to their operations. Help managers understand how mentoring can build individuals' skills and capabilities. Consider including managers' encouragement of mentoring by their employees as part of their performance evaluations.
- **Provide support to volunteers.** Individuals may be more willing to volunteer if they know their jobs and responsibilities are being covered by others.

[Example of a simple recruitment flyer for volunteer mentors.]

WASTECAP VOLUNTEER NETWORK

What is the Volunteer Network?

WasteCap Volunteers participate in a host of peer-educational activities to help other companies and institutions recycle and reduce waste. Some companies will request assistance over the phone while others request a more comprehensive Site Visit. We ask that Volunteers help in all or some of these efforts.

Volunteer Commitments

Volunteers participate in no more than four site visits per year, each of which lasts three to six hours, depending on the host company's size and needs. WasteCap also relies on Volunteers to provide technical assistance over the phone when companies have specific questions about a process or material, and to occasionally make presentations at events, prepare articles for a newsletter, or provide feedback on WasteCap projects. It is hoped that Volunteers will share their experiences with other professionals and encourage them to join the Volunteer Network. Volunteers decide which site visits they can or cannot do.

Volunteer Benefits

Joining the Volunteer Network is an excellent way to show your company's and your leadership in reducing solid waste in Massachusetts.

Participating in our Volunteer Network allows you to meet and work with other professionals who are addressing similar waste-reduction issues. By visiting other facilities or speaking to facility managers, Volunteers will learn new techniques to recycle and reduce waste, which they can then incorporate at their own facilities.

How to Join

Periodically, WasteCap will arrange training sessions on how to conduct effective Site Visits and how to work cooperatively with companies and motivate them to implement new programs. However, training sessions are now always feasible or necessary.

It is imperative that a potential Volunteer fill out a Volunteer Team Member Biographical Form/Confidentiality Agreement. Please fill out and return the form (both sides) as it helps us match your skills and experience with companies in need of assistance.

Thank you for becoming a WasteCap Volunteer!

- **Offer incentives.** Consider offering comp time off equal to some or all of the number of hours employees spend mentoring or other similar incentives. Also, offer to pay for travel, meals, and other expenses incurred while mentoring.
- **Offer rewards.** Consider rewards or recognition to employees who volunteer for mentoring. These can include certificates and plaques, letters of commen-

tion that are placed in employees' files, parties or other events that are exclusive to mentors.

OTHER ISSUES

Finding mentors is just the beginning. Also consider:

- **Training.** Many mentors don't need additional training- they are ready, willing, and able to provide

[Sample liability release form by a mentor to a mentoring program.]

DISCLAIMER FOR VOLUNTEERS IN THE TEXAS ENVIROMENTOR PROGRAM.

I, _____, in consideration of advising applicants in the Texas EnviroMentor Program, sponsored by the Small Business Assistance Program (SBAP), an independent division of the Texas Natural Resource Conservation Commission (TNRCC), hereby release and indemnify the SBAP, the TNRCC, and their agents from and against all liability or claims which I may have against the SBAP, the TNRCC, or their agents for all personal injuries sustained by me (including death) and any known or unknown damage to property arising directly or indirectly out of activities in the Texas EnviroMentor Program.

I understand and agree to abide by all the laws and policies pertaining to confidentiality in place at the SBAP and the TNRCC. I will consider all information discussed in my presence and told to me in my capacity as a program volunteer to be subject to the confidentiality policies in place at the SBAP and the TNRCC and will not disclose the information to any unauthorized person(s). I understand that violation of these policies may result in my dismissal from the Texas EnviroMentor Program.

Consultant _____ Advocate _____

Date _____

assistance based on their knowledge and experience. Others may need some tips and suggestions on how to be an effective mentor. (See page 41 for mentoring tips.) Most mentors will feel more comfortable if they have a basic agenda from which to work. Consider creating a brief training or orientation meeting for new mentors to provide basic information and answer questions. Consider holding mentor events, where individuals can meet and discuss issues, techniques, and concerns. Make more experienced mentors available to newer ones to offer assistance — a mentoring program for mentors!

• **Liability.** Some mentors may be concerned about legal liability resulting from mentoring. For example:

- a mentee blames a mentor or mentoring program for advice that resulted in the mentee's company losing business or suffering losses;
- a mentee blames a mentor or mentoring program for errors of omission because something that the mentor didn't see that later caused the mentee to be cited for noncompliance by a regulatory authority;

- a mentee believes the mentor shared confidential information about the mentee's business or operations with others;
- if mentors see a violation, must they point it out to the mentee?

In real life, these legal disputes are extremely rare. Most mentors and mentees engage each other with ample amounts of good faith and good intentions. However, in our litigious society, mentors (and mentoring programs) may naturally be fearful of the legal consequences of being a good Samaritan, causing them to be reluctant to participate.

Such reluctance can be overcome through a simple disclaimer by the mentor to the mentee. Such a disclaimer may be a separate document, or may be incorporated into a letter of engagement. Examples of documents used by other mentoring programs can be found in the following pages, including "The Mentor-Mentee Relationship," page 32.

As always, seek professional legal advice when drafting or signing such documents.

[Example of mentor confidentiality statement.]

CONFIDENTIALITY AGREEMENT

I, the undersigned individual, have offered to volunteer my time and services to WASTECAP OF MASSACHUSETTS, INC., a Massachusetts nonprofit corporation located at 376 Boylston Street, Boston, Massachusetts ("WASTECAP"), and hereby enter into this Confidentiality Agreement.

Preliminary Statement

I understand and acknowledge that as a part of my activities with WASTECAP, I may assist one or more businesses or institutions (collectively, the "Participant") in assessing and minimizing nonhazardous solid waste generated by the Participant and, in providing those services, may visit the Participant's site of operations. I also understand and acknowledge that during such site visits, or otherwise in the course of my activities as a WASTECAP volunteer, I may become aware of past, present, or potential future violations of federal, state, or local law by the Participant or its officers, directors, employees, or agents, including without limitations violations of environmental statutes or regulations. I also understand and acknowledge that during such site visits, or otherwise in the course of my activities as a WASTECAP volunteer, I may acquire information regarding the Participant's business or operations which is confidential and/or proprietary to the Participant.

NOW, THEREFORE, in the consideration of the opportunity afforded to me to serve as a WASTECAP volunteer and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, I agree as follows:

- Unless compelled by federal, state, or local judicial or administrative process or otherwise required by law, I will not disclose any past, present, or potential future violations of federal, state, or local law by the Participant or its officers, directors, employees, or agents to anyone other than an officer, director, or employee of the Participant, who is responsible for compliance with the law which has been or may be violated.
- Unless compelled by federal, state, or local judicial or administrative process or otherwise required by law, I will not disclose or make personal use of any confidential and/or proprietary information relating to the Participant's business or operations, except in the course of my activities as a WASTECAP volunteer. Such confidential and/or proprietary information shall not include any knowledge or information which is received, developed, or acquired prior to my activities as a WASTECAP volunteer from a source other than the Participant or through my own work, skill, or expertise.

IN WITNESS WHEREOF, I signed this Agreement as an instrument under seal on the ____ day of _____, 20__.

Volunteer Name: _____ Witness: _____

Address: _____

Checklist: Identifying and Training Mentors

SOURCES OF POTENTIAL MENTORS

- ✓ Current employees
- ✓ Trade associations
- ✓ Retirees
- ✓ Former mentors
- ✓ Students

ENCOURAGING VOLUNTEERS

- ✓ Get top management support
- ✓ Engage middle managers
- ✓ Provide support to volunteers
- ✓ Offer incentives
- ✓ Offer rewards

OTHER ISSUES

- ✓ Training of mentors
- ✓ Liability of mentors in providing assistance
- ✓ Confidentiality of information gained by mentor about mentee



Even though a mentoring program may offer services at no cost to its customers, the relationship still involves a business relationship between mentor and mentee. Much like a conventional business relationship, the one-to-one mentoring relationship requires a clear understanding between both parties of the nature of the engagement: what each party expects of the other, over what period of time, and each party's roles, rights, and responsibilities. The most effective way to do this is through a letter of engagement from the mentor to the mentee.

This need not be a formal document filled with legalese. It can be simple and straightforward, outlining in plain language several key points. Among them:

- **Overview** — how the mentoring works, how long it will take place, where it will take place, how many sessions, and other big-picture issues.
- **Objectives** — specific project goals to be addressed during the mentoring program in a way that the outcome may be measured and assessed.
- **Mentor's commitment** — what specific services the mentor will deliver, over what time frame, using what techniques (site visits, telephone calls, e-mail), etc.
- **Mentee's commitment** — what the mentee is expected to do before, during, and after the direct mentoring relationship.
- **Costs** — any costs that may be incurred by the mentee, such as for materials, or to reimburse the mentor for travel or other expenses.
- **Liability** — any security, legal, and liability issues that might affect the relationship between mentor and mentee. (A release of liability may be executed separately. See sample statement on page 33.)
- **Confidentiality**— a statement outlining how the mentor will address any information learned about the company through mentoring with government agencies, other companies, or anyone else. Such a statement should address intellectual property and

compliance issues, including regulatory violations. (See example in John Roberts letter, page 34.)

- **Disclaimers** — for example, a statement that it is up to the mentee to put the mentor's advice to work, and that the mentor is not responsible for any outcomes resulting from the mentee's implementation of that advice.

An example of such a letter may be found on page 34. As always, consult legal counsel before drafting or executing any such document.

It is important that both companies in a mentoring relationship — particularly the mentee — have a strong commitment to seeing the process through. Uncertainty on the part of either party may yield disappointing results for one or both participants. The letter of engagement can help both parties avoid such disappointment by ensuring each fully understands what they are entering into.

PRE-MENTORING ASSESSMENT

Before the mentoring process starts, it may be helpful for the mentor to contact the mentee to assess his or her knowledge of the environmental issues that are the focus of the mentoring project. Again, this need not be a formal process, and should not be seen as a test or inspection. Rather, a pre-mentoring assessment provides the mentor with some background regarding the company, facility, staff, etc. This enables the mentor to match "skill sets" with the mentee's staff and to help the mentor plan for the level of knowledge and type of problems he or she will be encountering. This also may serve as a baseline assessment that can help the mentor develop realistic expectations about the first visit.

Some mentoring programs ask mentees to fill out a questionnaire, while other programs merely conduct a casual phone interview. Sample questionnaires can be found beginning on page 36.

The specific questions will differ based on a program's focus. Among the information to consider requesting:

[Example of a release of legal liability by a mentee to a mentoring program.]

Disclaimer for SMALL BUSINESS OWNERS in the Texas EnviroMentor Program

As a recipient of free consultation services from a person participating in the Texas EnviroMentor Program, I, _____, agree to release and indemnify the Texas EnviroMentor Volunteer and his or her employer from and against all liability or claims for all personal injuries sustained by me (including death) and any known or unknown damage to property caused by or arising out of activities in the Texas EnviroMentor Program. I understand that the Texas EnviroMentor Volunteer is not an agent of the Small Business Assistance Program (SBAP) or the Texas Natural Resource Conservation Commission (TNRCC), and makes no warranty or other assurance that his or her recommendations will meet TNRCC permit requirements or the requirements of other applicable laws, and I agree to release and indemnify the Texas EnviroMentor Volunteer and his or her employer from and against all liability or claims for any damages arising directly or indirectly from the Texas EnviroMentor's Volunteer's recommendation.

Furthermore, I release and indemnify the SBAP, the TNRCC, and their agents from and against all liability or claims for all personal injuries sustained by me (including death) and any known or unknown damage to property arising directly or indirectly out of activities in the Texas EnviroMentor Program. I understand that the SBAP and the TNRCC make no warranty or other assurance that the Texas EnviroMentor Volunteer's recommendations will meet TNRCC permit requirements or the requirements of other applicable laws, and I agree to release and indemnify the SBAP, the TNRCC, and their agents from and against all liability or claims for any damages arising directly or indirectly from the Texas EnviroMentor Volunteer's recommendations.

By my signature, I indicate that I have read and understood the above conditions for participation in the Texas EnviroMentor Program.

(Signature) _____

General Information

- ✓ Company name and contact information
- ✓ Type of company
- ✓ Size (number of employees, number and sizes of facilities)
- ✓ General description of products and services

General Environmental Issues

- ✓ Key environmental issues
- ✓ Key drivers and motivating factors (regulators, customers, stockholders, community, etc.)
- ✓ Compliance-related issues
- ✓ Greatest environmental successes
- ✓ Greatest environmental challenges
- ✓ Workplace health and safety concerns or problems

Specific Company Information

Energy Consumption

- ✓ Amounts and types of energy used (oil, natural gas, electricity, coal, etc.)
- ✓ Number and types of steam systems, compressed air systems, boilers, and motors
- ✓ Lighting and heating used for both office and nonoffice areas

Water Consumption

- ✓ Amount of potable and nonpotable water used per month, and cost of each
- ✓ Description of on-site treatment of incoming freshwater (source, treatment, use)
- ✓ Description of wastewater treatment (volume, method, cost, where discharged)
- ✓ POTW sewer discharges and costs

Continued on page 35

[Example of letter of commitment used by The John Roberts Company.]

Dear

I am pleased to formally inform you that your company has been selected to participate in the John Roberts Company Environmental Management Mentoring Program.

As you know, the idea behind this mentoring program is that a company with experience in environmental management share its expertise and knowledge with smaller companies having somewhat more limited resources. In so doing, there is a great opportunity to help more companies effectively deal with the complexities of environmental responsibility.

Over the next six months, I will be providing you with direct help in establishing your company's own environmental management system (EMS). You will benefit from my sharing practical experience as we work together to design an EMS that is sized to your company. Now, some of the details you need to know.

Security and Confidentiality: At no time will any proprietary information be shared with any other party, or with the EPA or the State of Minnesota. All matters of business will be held strictly confidential.

Regulatory Compliance: I will, to the best of my ability, and as an aid to your company, advise you of any questionable areas of potential noncompliance with regulations. You, however, remain solely responsible for being in compliance, and any omission on my part does not relieve you of your responsibility to comply with all regulations. Should a noncompliance issue arise, you need to know that under the EPA's "Compliance Incentives for Small Business Policy," your company has the opportunity to make timely correction of any noncompliance issue without penalty.

JR Mentoring Commitment: I will visit your facility at least four times. The first time to assess your current environmental management, discuss areas of concern, and familiarize myself with your site and operations. The following facility visits will be for the purpose of providing hands-on assistance and practical information you can use in either setting up or improving your EMS. During the facility visits, I will work with you or your designated staff for up to eight hours to initiate your program. After the facility visits are completed, I will remain available by phone for consultation as your program progresses. Additional site visits are possible (when mutually agreed upon) on an as-needed basis.

Mentee's Commitment: You have agreed to complete a brief baseline analysis of your current environmental knowledge, to complete the Printing Industries of America Environmental Management Self-Study Program and final test between the first and second facility site visit, and to allow me the opportunity to conduct with you an outcome analysis of the mentoring experience some six to eight months after the conclusion of the site visits. Additionally, you have agreed to work hard and make the most of my time while at your facility.

Well, that about takes care of the formalities. I hope that you are as excited as I am about this opportunity to work together to the betterment of your company. I'll be contacting you soon to arrange for the second site visit.

Kindest regards,

Jeffrey R. Adrian, Environmental Director

Solid Waste

- ✓ Amounts and types of waste created
- ✓ Monthly disposal costs, by type of waste
- ✓ How waste is stored and transported

Hazardous Waste

- ✓ Amounts and types of waste created
- ✓ Monthly disposal costs, by type of waste
- ✓ How waste is stored and transported
- ✓ Operational and management costs
- ✓ Risk and hazards assessments

Recycling

- ✓ Types and amounts of materials recycled
- ✓ Costs and revenues from recycling, by material

Materials Sourcing

- ✓ Quantity and source of recycled or environmentally preferable products being sourced
- ✓ Recycled or environmentally preferable products unable to source due to issues of quality, price, availability, incompatibility, etc.

Management

- ✓ Does the company have an environmental policy?
- ✓ Who is responsible for overall environmental management?
- ✓ Which job positions most affect the company's environmental performance?
- ✓ How many permits does the facility have?
- ✓ Is training conducted?
- ✓ Have there been past violations? If so, for what?
- ✓ Do environmental people play any role in product design, purchasing, facility acquisition, etc.
- ✓ Are their established safety procedures?
- ✓ What are the process control procedures?

Other Issues

- ✓ Overall relations with regulators
- ✓ Compliance costs and burdens
- ✓ Overall customer pressures or concerns
- ✓ Community pressures or concerns
- ✓ Profitability of operations
- ✓ Ability to attract and retain employees
- ✓ Company history, previous owners, future plans

Materials to Provide

- ✓ Names and titles of company staff to be involved
- ✓ Site plans, including building dimensions
- ✓ Schematic process flow, equipment layout, and work-flow diagrams
- ✓ Product and raw material inventory and costs
- ✓ Materials Safety Data Sheets and other paperwork
- ✓ Contracts with commercial waste-management firms
- ✓ Copies of utility bills

[Example of Pre-mentoring assessment questionnaire.]

WASTECAP SITE VISIT QUESTIONNAIRE

WasteCap of Massachusetts will use this questionnaire to prepare for your Site Visit and to select volunteers with the expertise that will meet your firm's needs. Please provide the information that is available (leave other questions blank) and feel free to include additional information that would assist WasteCap to better understand your waste management program and goals. WasteCap will keep the information that you provide confidential. Please contact WasteCap at 617-236-7715 if you have any questions about this questionnaire.

I. Background Information

Company Name _____

Contact Name _____ Title _____

Address _____

City, State, Zip _____

Telephone _____ Fax _____ Email _____

Briefly describe your business:

Total # of employees _____ Occupied square footage _____

II. Solid Waste Information

1. How much solid waste does your company generate each month (pounds or cubic yards). Please indicate if information is actual or an estimate.

_____ / month

2. Current trash hauler _____

3. Describe how solid waste is stored & transported, types of collection containers used & frequency of collection.

4. What is your monthly solid waste disposal cost? \$ _____ /month

5. If possible, please break your monthly disposal costs into the following:

Container rental/month

Handling cost

Disposal cost

\$ _____ /month

\$ _____ /month

\$ _____ /ton or yd³

6. Please describe any seasonal fluctuations in your waste generation.

III. Waste Reduction/Recycling Activity

1. To the best of your knowledge, please provide specific information about your waste stream.

(Please circle one)	Do You Generate?	Do You Recycle?	Amount recycled/ discarded each month
PAPER			
1. Office paper	Yes/No	Yes/No	
2. Cardboard	Yes/No	Yes/No	
3. Newsprint/ mags.	Yes/No	Yes/No	
4. Other	Yes/No	Yes/No	
WOOD			
1. Pallets	Yes/No	Yes/No	
2. Boxes	Yes/No	Yes/No	
3. Stumps	Yes/No	Yes/No	
4. Other	Yes/No	Yes/No	
METAL			
1. Ferrous (steel, tin)	Yes/No	Yes/No	
2. Nonferrous (alum)	Yes/No	Yes/No	
3. Other	Yes/No	Yes/No	
GLASS			
1. Bottles	Yes/No	Yes/No	
2. Plate	Yes/No	Yes/No	
3. Other	Yes/No	Yes/No	
PLASTIC			
1. PETE (#1)	Yes/No	Yes/No	
2. HDPE (#2)	Yes/No	Yes/No	
3. PVC (#3)	Yes/No	Yes/No	
4. LDPE (#4)	Yes/No	Yes/No	
5. PP (#5)	Yes/No	Yes/No	
6. Polystyrene (#6)	Yes/No	Yes/No	
7. Other	Yes/No	Yes/No	
OTHER			
1. Food Waste	Yes/No	Yes/No	
2. Yard Waste	Yes/No	Yes/No	
3. Textile	Yes/No	Yes/No	
4. Toner cartridges	Yes/No	Yes/No	
5. Bulbs/ballasts	Yes/No	Yes/No	
6. Batteries	Yes/No	Yes/No	
7. Computers	Yes/No	Yes/No	
8. Other	Yes/No	Yes/No	

2. If your company was recycling, but discontinued the effort, please explain why.
3. Describe your recycling system (e.g., "We collect office paper in 90 gallon totes." "We currently bale cardboard for recycling.")
4. How much does recycling cost your company each month? \$_____ /month. Please explain.

IV. Waste Reduction/Recycling Policies and Goals

1. Has your company established an internal team to review waste reduction and recycling issues? Yes No
2. Does your company have waste reduction and recycling goals or policies? If so, please explain.
3. Does your company have a policy regarding the recyclability or the recycled content of products that are purchased? If so, please explain.
4. Identify and prioritize your firm's greatest waste reduction needs and issues.
5. Please check off the following areas that you would like the WasteCap Site Visit to address:

- | | |
|--|--|
| <input type="checkbox"/> Identifying source reduction opportunities | <input type="checkbox"/> Marketing recyclables |
| <input type="checkbox"/> Reducing packaging | <input type="checkbox"/> Purchasing recyclable materials |
| <input type="checkbox"/> Setting up/working with an internal Green Team | <input type="checkbox"/> Purchasing materials with recycled content |
| <input type="checkbox"/> Developing corporate waste reduction goals and policies | <input type="checkbox"/> Managing organic materials |
| <input type="checkbox"/> Obtaining internal resources (e.g., financial, staff, etc.) | <input type="checkbox"/> Educating and training employees about waste reduction programs |
| <input type="checkbox"/> Establishing an inventory/purchase control system. | <input type="checkbox"/> Motivating employees to participate in waste reduction efforts |
| <input type="checkbox"/> Working with vendors/suppliers | <input type="checkbox"/> Other. Please explain. |
| <input type="checkbox"/> Collecting and processing recyclable materials | |

V. Additional Information

1. WasteCap strongly encourages companies to invite personnel from different departments to participate in the WasteCap visit (i.e., management, purchasing, human resources, facility management, engineering, and maintenance). Please indicate who might participate.

Name _____ Job title _____

Name _____ Job title _____

Name _____ Job title _____

2. Is it appropriate for WasteCap to mail a summary of this questionnaire to your Volunteer Team members in advance or should WasteCap wait and share the information with them on the day of the Visit?

It is not a problem to distribute copies in advance.

Wait and share the information on the day of the Visit.

3. How did you learn about WasteCap?

[Example of a pre-assessment checklist.]

DETAILED WASTE REDUCTION ASSESSMENT CHECKLIST

Company _____ Date _____

Energy Consumption

Enter the energy source(s) in the tabulation below.

Form (Units)	Units/Month	Cost	
		\$/Unit	\$/Month ¹
Oil (gallons)			
Natural gas (1000 cf) ²			
Coal (tons) ⁴			
Wood (tons) ⁴			
Electricity (kWh) ³			
Gas. Liquified (gallons) ⁴			

¹Average of at least 4-6 months; winter and summer months should be considered for comfort heating

²May be given in therms = 0.1 Mbtu = 100 cf natural gas = Ccf

³Give plant power factor _____

⁴Give kind/type of fuel: e.g., bituminous coals, hardwood, propane liquified gas

Steam System

Boilers Number _____ Rating _____ 1 lb/hr @ _____ psig. fuel _____

Estimated cost to produce steam \$ _____ per 1,000 lbs.

Consumption _____ 1,000 lb/month Waste heat boilers: number _____

Rating _____ lb/hr; Boiler feed water: source _____

Condensate return: full _____ partial _____ none _____

Preventive maintenance program? Yes _____ No _____

Compressed Air System

Compressors: Number _____ Rating _____ kW/hp/cfm

Leak detection and preventive maintenance? Yes _____ No _____

Note: Consumption and cost data are generally invoiced by the off-site server, giving time period, units consumed, total charge; copies of such invoices generally provide the information requested in these checklists.

Continued

Company _____ Date _____

Water Consumption (Usage)

Form	Units (1000 gal/month ¹)	\$/Unit Cost	(\$/month ¹)
Potable (total)			
Well (number ____)			
Industrial (city) 2			
Treated Process			
Potable Process			

¹ Average of at least 4-6 hours

² Cooling of process, as is

On-site treatment of incoming fresh water: Source _____; used for _____ potable? process _____? Cooling _____? Treated by: precipitation _____? filtration _____? neutralization _____? softening _____? deionization _____? chlorination _____? Other _____? Sludge generated _____ ton/mo. Dried _____? H2O content _____% Hazardous? _____; Other _____
 Disposal costs: See form under "Wastewater Treatment"

Wastewater Treatment (WWT)

Volume treated _____ 1,000 gal/month
 Cost of treatment _____ \$/month (total)
 Cost of chemicals _____ \$/month
 Effluent discharged to _____
 Sludge generated _____ tons/month. Dried _____ H2O content _____%

Disposal cost:

	WWT	Fresh Water Treatment
Average number pulls (hauls)/month		
Charge by contractor _____ \$/haul		
Tipping fee at landfill _____ \$/ton		
Total disposal cost/month \$		

POTW Sewer Charges

Volume discharged _____ 1,000 gal/month
 Measured _____ Estimated _____ Assumed _____, or
 Same as purchased _____
 POTW's charge _____ \$/1,000 gal.



There is no “right” way to mentor. The best technique is the one that is right for the individuals involved — that helps the mentor understand the mentee’s issues and concerns and allows the mentor to effectively share his or her knowledge and expertise. Effective mentoring can take place in a wide variety of ways — in person, on the phone, via e-mail and fax, at the mentor’s or mentee’s facility or somewhere entirely different.

Whatever the style and means of mentoring, here are suggestions to help ensure the mentoring process is as effective as possible for both parties:

- **Set practical goals.** At every stage of the relationship, make sure the goals of the project are clear and realistic and include timelines for meeting established benchmarks.
- **Identify potential obstacles.** Identify in advance any obstacles that would prevent the implementation of any proposed recommendations. Such obstacles might include limited financial resources, contractual relationships, etc.
- **Seek similar business interests.** Companies that are either in the same industry sector or use similar processes are more likely to have a successful mentoring relationship. Matching “skill sets” between individuals from the mentor company to those in the mentee’s staff is also an effective strategy — such as manager to manager, or foreman to foreman.
- **Plan a self-directed project.** Self-directed projects provide an opportunity for the mentee to put what has been learned into place.
- **Be flexible.** Mentors should be flexible in their approach and adjust to the needs of the mentee.
- **Plan for change.** Design into the mentoring program the assumption that the person being mentored will leave the company or change jobs — possibly while the mentoring is in progress. Documenting processes and other information and involving several people within a company can help ensure that any changes won’t adversely affect the mentoring relationship.
- **Keep it simple.** Mentors cannot assume that the mentee has the same level of experience, education, and understanding of environmental issues. Therefore, mentors should be able to translate complex concepts into plain language and avoid using technical jargon.
- **Focus on the practical.** Practical information about how to set a system or think about doing a specific task is more useful than abstract discussions about materials flows and industrial ecology.
- **Understand time constraints.** Both mentor and mentee must have realistic expectations regarding the time spent in the mentoring process.
- **Don’t assume what the mentee needs.** Mentors will be more successful if they listen to the needs of the mentee versus telling them what they think they need.
- **Use business language.** Frame advantages in terms of cost savings, efficiency, and profits. This makes it easier for the mentee to justify potential changes while removing stereotypes of “feel-good” environmental programs.
- **Above all, be positive.** Mentees may find unsettling some of the things they learn through mentoring — that they’ve been wasting money or violating the law, for example. Help them keep things in a positive light to reduce anxiety or fear. Also help the mentee understand that the advice or suggestions being given don’t necessarily have to be done all at once.

ORGANIZING A SITE ASSESSMENT

Following is a checklist of general considerations in conducting a site assessment.

Pre-Visit

- ✓ Set assessment date and time
- ✓ Determine type of manufacturing process and final product
- ✓ Ask client to send:
 - ✓ Photocopies of past two years of utility billing data
 - ✓ Plant layout
 - ✓ Map to facility
 - ✓ List of type, quantity and disposal cost of each waste stream

Day of Visit

- ✓ Initial briefing with management and guide
- ✓ Explain audit ground rules and deliverables
- ✓ Discuss utility analysis
- ✓ Ask for overview of production process
- ✓ Facility walk-through
- ✓ Generate list of possible savings opportunities
- ✓ On-site data collection
- ✓ Make measurements and observations to quantify opportunities
- ✓ Talk to as many levels of personnel as possible
- ✓ Debriefing with management and guide
- ✓ Describe savings opportunities and deliverables

Post-Visit

- ✓ Analysis of results
- ✓ Estimate savings and simple payback of each opportunity
- ✓ Recommend and prioritize opportunities
- ✓ Compile results into a written report
- ✓ Deliver final report

Follow-up

- ✓ Phone call after 6 to 12 months
- ✓ Discuss implementation results and satisfaction with service

Assessment Equipment

- ✓ Hardhat
- ✓ Safety glasses
- ✓ Ear plugs
- ✓ Leather shoes
- ✓ Shop rag
- ✓ Flashlight
- ✓ Light meter
- ✓ Amp meter
- ✓ Multi-meter
- ✓ Contact and immersion temperature sensors
- ✓ Air flow sensors
- ✓ Combustion analyzer
- ✓ Air pressure gauge with quick release
- ✓ One-gallon bucket
- ✓ Watch/stop watch
- ✓ Calculator
- ✓ Reference material
- ✓ Watt meter with data logger

Safety Tips

- ✓ Discuss plant safety with all assessment personnel before entering plant.
- ✓ Follow all plant rules.
- ✓ Remove jewelry and loose clothing.
- ✓ Don't reach into equipment.
- ✓ Don't touch equipment or liquid spill



The mentoring relationship shouldn't end when a mentoring program has stopped providing direct assistance. Learning, as they say, is a lifelong activity, and that holds true for companies as well as people.

There are several principal reasons to follow up after direct mentoring activities have ceased: to gauge the effect of mentoring on individual companies; to provide continued support beyond the initial relationship; and to assess the quality of the mentoring program and of individual mentors.

Many mentoring programs use formal evaluation systems. Often, they are in the form of a questionnaire sent to the mentee, seeking answers to specific questions. Examples can be found beginning on page 44.

These questionnaire can be effective, but they don't always get the whole story. Therefore, it also may be useful to follow up with mentees on the phone, or even in person, to gauge their progress, answer their questions, and get feedback about the program. Among the things to find out:

About the Company

- ✓ What direct changes resulted from the mentoring?
- ✓ What indirect changes?
- ✓ What were the measurable environmental savings?
- ✓ What were the measurable financial savings?
- ✓ What were the process improvements that resulted?
- ✓ What were the quality improvements that resulted?
- ✓ How was regulatory compliance improved?
- ✓ Other improvements worth noting?
- ✓ What recommendations weren't implemented? Why?
- ✓ What questions and concerns remain?

About the Mentor Program

- ✓ Was the mentoring program effective?
- ✓ Was the mentor knowledgeable and helpful?
- ✓ Was the quantity and quality of information adequate for your needs?
- ✓ Were you able to get all of your questions and concerns satisfactorily answered or addressed?

- ✓ Would you use the program again?
- ✓ Would you work with the individual mentor again?
- ✓ How would you have done things differently?
- ✓ What would you like differently from a mentor?
- ✓ Would you recommend program to other companies?
- ✓ Would you write a letter of recommendation?
- ✓ Would you be willing to serve as mentor to another company?

MEASURING PROGRESS

It may be helpful to the mentoring program to track general and specific aspects of the program. This can help measure and assess the program's growth as well as its impact. These measurements also may be useful when reporting on the program to other internal and external stakeholders.

There are a wide range of potential program evaluation criteria to consider. Among them:

- ✓ Number of mentoring relationships conducted over a give time period
- ✓ Number of mentoring hours or days
- ✓ Number of companies reached
- ✓ Number of action items produced for mentees and dollar savings for each
- ✓ Quantity of pollutants reduced (expressed in tons, pounds, gallons, or other meaningful measurements)
- ✓ Dollars saved by mentees as a result of the mentoring program
- ✓ Employee leave hours reduced as a result of the mentoring program
- ✓ Number of phone inquiries handled
- ✓ Number of visits to Web site
- ✓ Number of presentations made to companies and business groups
- ✓ Dollar value of mentoring assistance, based on mentors' time contributed
- ✓ Number of media impressions from ads and articles
- ✓ Dollar value of media impressions

[Example of an evaluation form used by The John Roberts Company.]

MENTORING EVALUATION QUESTIONNAIRE PROGRAM FEEDBACK

Satisfaction With Mentoring:

Was the purpose of mentoring clear?	Yes	No
Was the information presented in a useful way?	Yes	No
Was the self-study manual easy to understand?	Yes	No

What aspects of mentoring were most useful to you?

What aspects were not useful for you?

Where did you typically get your environmental information? How does that source compare to the environmental information you received from the mentoring?

Did the mentoring sessions and self study manual provide you with additional environmental information that you previously did not have?

Would you recommend mentoring to other printers as a way to get environmental information? Can you identify any other ways you would like to receive environmental information?

How could the mentoring program be improved to further satisfy your needs?

Participation Experience:

Why did you decide to participate?

How did you feel about the time commitment required to participate in mentoring?

What benefits if any, do you believe you and your company obtained from participation in mentoring?

What incentives, if any, do you think are needed for small businesses to participate in a mentoring program?

What would be most persuasive for other printers to join a mentoring program?

What role or incentives, if any, could state or federal government have to ensure that small printers get the greatest possible value from a mentoring situation?

Do you feel you are more knowledgeable about environmental issues as a result of the mentoring experience? If yes, does your company or supervisor recognize this change?

Would you participate in mentoring again in the future? Yes No

Why? _____

Do you feel your suppliers or customers could benefit from mentoring?

Why? _____

[Example of a simple, one-page evaluation form.]

SBEAP Customer Survey



1001 North Central Ave #500
Phoenix, Arizona 85004-1942
Attn: Richard Polito
Program Manager

Please take a few minutes of your valuable time and evaluate our services. Your input will provide important information on how we may offer even better service when assisting small & medium size businesses and their need to comply with environmental regulations. Please fax to (602) 506-6669 or mail to the address above.

Did we respond to your request for assistance within 2 working days? Yes No
If no, please explain. _____

Were we courteous, professional, helpful and easy to understand? Yes No
If no, please explain. _____

Would you recommend our services to other businesses in Maricopa County? Yes No
If no, please explain. _____

Would you be interested in having an on-site assessment with a focus on Pollution Prevention activities? Yes No

Have you ever made written comment on permit fees or draft rules that affect your industry? Yes No

Do you have an innovative pollution prevention practice(s) that you'd share in our next *Visibility* newsletter? **If YES, please call 506-5102 or fax to 506-6669** Yes No

Maricopa County's "Visibility" newsletter:

Have you ever read this publication? Yes No
If no, would you like to be added to our mailing list? Yes No

Do you access SBEAP's web site (<http://www.maricopa.gov/sbeap>)

for any of the following?

- Rules & Regulations Links to other sites News & Events Pollution Prevention
- Environmental Education Getting Permits Workshops & Hearings
- Other _____

How can we market SBEAP services to businesses that need to comply with environmental regulations?

PLEASE RATE THE SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAM (SBEAP) OVERALL:

- EXCELLENT GOOD FAIR POOR

PLEASE RATE OUR COUNTY ENVIRONMENTAL SERVICES DEPARTMENT (PERMITTING PROCESS, etc) OVERALL:

- EXCELLENT GOOD FAIR POOR

COMMENTS _____

Company Name _____ Phone Number _____

Contact Person _____ FAX Number _____

THANK YOU!

The five case studies that follow were researched and compiled for the Institute for Corporate Environmental Mentoring by Leah Haygood. Longer versions of these case studies appear in “Environmental Mentoring: Benefits, Challenges, and Opportunities,” published by ICEM. (See “About ICEM,” page 56.)

The five case studies comprise a diversity of program formats, program focuses, and sponsoring organizations. They include:

- General Motors Corp. — a large manufacturing company mentoring its suppliers worldwide;
- The John Roberts Co. — a midsized printer mentoring smaller printers in its region;
- Pittsburgh Business Efficiency Partnership — a partnership of nonprofit organizations offering mentoring to regional companies;
- Santa Clara County Pollution Prevention Project — a program by county authorities to help companies in select industries reduce wastewater emissions; and
- WasteCap — a statewide public-private partnership aimed at helping companies reduce generation of solid waste.

GENERAL MOTORS SUPPLIER DEVELOPMENT and SUPPLIER ENVIRONMENTAL ADVISORY TEAM: Driving the Supply Chain for Mutual Gain

Like many manufacturing companies, General Motors Corp. (GM) relies on a large network of suppliers — more than 5,000 — to provide the parts and services it needs to build its products. GM sees considerable benefit in working closely with its suppliers on issues of mutual interest such as quality, service, technology and cost. Its Supplier Development Department leads the company's initiatives in working with suppliers.

In 1992, GM began a program — now called “Lean Implementation” — through which GM supplier development engineers work on-site with suppliers to identify opportunities to cut costs, improve delivery times, and address quality issues. After joining the U.S. Environmental Protection Agency's Climate Wise Program in 1995, GM committed to working with its suppliers to address environmental and energy issues. In 1996, GM developed and provided additional training and resources to its supplier development engineers to further address those issues.

While its lean implementation program provides a focus on specific supplier issues, GM was also interested in how it could work with its suppliers most effectively to encourage environmental improvement. GM asked the Business for Social Responsibility Education Fund (BSREF) to conduct a benchmarking study of how other companies approach supply chain environmental issues. BSREF identified nine characteristics of firms with leading supply-chain environmental efforts, including:

- a strong, high-level commitment to environmental stewardship;
- a desire to lead industry efforts;
- integration of the environment into core business functions;
- clear, consistent, frequent internal communication;
- clear, consistent, frequent, and two-way communication with suppliers;
- a targeted supplier effort;
- supplier solicitation, selection and monitoring that includes environmental performance;
- supplier education; and
- feedback mechanisms for continuous improvement.

Based in part on the study, GM brought together a team of key suppliers to jointly seek answers to the overarching questions. The Supplier Environmental Advisory Team (SEA Team) was formed in 1997 to provide supplier input on environmental issues.

GM launched the environmental component of the lean implementation workshops in 1996 by developing a training course and materials for its supplier development engineers. It held a training for its 150 North American Supplier Development Engineers (SDEs) and followed up with a training in Shanghai for international supplier development directors and managers (who would then train the engineers who have direct contact with suppliers). The role of the SDE is to facilitate a problem-solving process and offer resources, but not to prescribe actions or approaches. SDEs come from a variety of backgrounds. Many have expertise in the industries that supply GM, rather than in automobile manufacturing. The objectives of the Lean Implementation workshops are to identify specific actions for savings and other improvements and to train the supplier in problem-solving methods that can be used elsewhere in the facility, in the company's other facilities, and hopefully, with the supplier's suppliers.

The environmental/energy focus is one module of a supplier development workshop. GM offers the workshops to suppliers, often on the recommendation of the Purchasing or Quality departments. Participation in the workshop is voluntary — or at least as voluntary as an invitation from GM to a supplier can be. A number of issues could trigger a recommendation for a workshop — a proposed price increase, a commitment to reduce price, an issue with delivery times or the quality of the part supplied.

Typically, a workshop takes place at a supplier's facility and lasts three to five days. Two or three SDEs facilitate the workshop. Before the workshop, an SDE does an on-site pre-assessment to identify issues to tailor a workshop around. The workshop proceeds with a combination of training and facilitated problem-solving exercises. Participants tour the site and look for ideas for improvements. As problems are identified, participants analyze the root causes. Generally, the participants agree to focus on one issue or production process and do a detailed assessment of that area. The participants develop a plan to address the issue(s) and

identify action items for follow-up. In many cases, action begins during the course of the workshop.

GM contacts the supplier at intervals of three, six, and twelve months to track implementation of action items. There are no specific sanctions for failing to implement the plan. GM does provide an incentive to find and implement savings. It offers to share savings with the supplier, using several models. For example, if an action would save \$200,000 per year and the supplier provides 200,000 parts per year to GM, the supplier might reduce the cost of the part by 50 cents and retain the other 50-cent savings.

Measures of Success

GM has collected case studies and tracked the number of action items identified and associated savings. However, quantifying environmental benefits of the program can be challenging. Action items are not designated as “environmental,” nor are typical environmental performance indicators such as emissions reductions or energy savings tracked. Many implemented improvements have had multiple benefits, only some of which are environmental. For example, one workshop identified improved practices that could eliminate the use of a warehouse, saving the energy

used to run the building and transport goods to it as well as emissions from the transportation equipment.

Successes and Challenges

GM has found its initiatives to be valuable in different ways. The supplier development workshops have been an effective way to identify opportunities for improvement at suppliers’ facilities and in the products supplied to GM. In addition, the action items implemented have resulted in measurable environmental improvements and savings to GM and its suppliers. The addition of a specific focus on energy and environmental issues has been helpful because there are often “low-hanging fruit” that can be picked to create savings. For example, GM often finds equipment left turned on all the time, even if it is only needed part of the time. Suppliers have also been found to paint “unseen” parts. Eliminating the paint saves materials and reduces emissions.

The SEA Team complements the supplier development workshops by providing a way to address environmental supply chain issues cooperatively with suppliers at a policy level. GM found the SEA Team’s input to be very valuable when producing the letter on environmental expectations that was sent to its major suppliers.

THE JOHN ROBERTS COMPANY: Duplicating a Printer’s Environmental Success

The John Roberts Company developed a printing industry mentoring program as part of its participation in the U.S. EPA’s Environmental Leadership (ELP) Program. John Roberts was selected as a pilot project for the program in 1995. The company pledged to carry out a number of voluntary activities, including demonstrating an environmental management system (EMS) and mentoring smaller printers. John Roberts, based in the Minneapolis, Minn. area, is considered medium-sized within the printing industry, with 392 employees at one facility.

During the ELP pilot phase, Jeff Adrian, John Roberts’ EHS Director, conducted one-to-one mentoring with four smaller printers in Minnesota and Wisconsin. The

objectives of the mentoring were to help raise the level of environmental performance by smaller printers in the Great Lakes Region and to demonstrate John Roberts’ leadership in doing so. Although they are in the same industry, the mentee printers were not considered competitors of John Roberts. At a time when the environmental impact of the printing industry was under scrutiny in the region, John Roberts saw value in demonstrating that the printing industry could help its members achieve compliance and environmental excellence.

Adrian visited the facilities of the Minnesota-based printers several times each. For the Wisconsin printer, he made one two-day site visit, supplemented by telephone, fax, and e-mail consultation. Adrian’s assistance to the mentees consisted of several resources:

- one-to-one on-site help in assessing the company's EHS issues, gaps, and resource needs;
- use of model materials adapted from John Roberts' EMS, including a template for organizing compliance documents, training materials and documentation, and compliance schedules and checklists; and
- review and feedback on the mentee's efforts to address environmental management issues and specific compliance challenges.

Measures of Success

Each mentee took an environmental awareness test prepared by the Printing Industries of Minnesota at the beginning of the mentoring program. The mentees averaged about 34% on the initial test and 56% after completing a Printing Industries of America self-study course but before the mentoring. In addition, Adrian devised and asked the mentees to fill out a qualitative evaluation of the mentoring experience. Generally, the mentees were very satisfied with the mentoring and would do it again. They found the one-to-one approach to be very helpful and had continued to implement environmental initiatives, including some pollution prevention measures.

During the ELP pilot, Adrian tracked the time he spent on all program activities. The mentoring took 248 hours, nearly half of all his time spent on the pilot. No cost-benefit analysis was done by John Roberts for its mentoring or its overall participation in the ELP program, but clearly there were significant opportunity costs involved.

Successes and Challenges

In addition to raising their environmental awareness, each of the mentees made progress on specific compliance issues and on developing an environmental management system.

John Roberts benefited as well. Adrian found that "through the process of mentoring, [John Roberts'] own safety and environmental programs have been reinvigorated." Adrian does not report having encountered specific environmental innovations that his company could adopt, but the process of presenting his program as a model and discussing it with mentees led to reexamining and improving it.

However, some issues did arise during the mentoring. There was turnover in personnel at three of the four mentored companies, leading to some lost time in bringing the new people up to speed. This led Adrian to increase the emphasis on institutionalizing plans and procedures so that the next incumbent could adopt them.

He also found that working with a single person at a company often was not sufficient. While an operations person — usually his first contact — was helpful in leading an operations review and implementing changes on the ground, that individual usually was not the right person to develop and maintain documentation of the management system. Usually an administrative person was required to join the team to help with those functions.

PITTSBURGH BUSINESS EFFICIENCY PARTNERSHIP: Networking For a Cleaner Region

The Pittsburgh Business Efficiency Partnership (PBEP) was launched in 1996 through a series of meetings between PBEP staff and businesses in the Pittsburgh area. In these meetings, PBEP staff sought to understand the environmental challenges facing Pittsburgh companies and gaps in the resources then available to them. Through these meetings, they obtained commitments from about 20 companies to participate in and help lead the PBEP. These compa-

nies formed a Steering Committee that provided guidance throughout the project.

The first meeting — focusing on "Identifying and Implementing Industrial Energy Efficiency Opportunities" — was held in 1997. Since then, PBEP has held additional workshops and plant tours.

The PBEP is administered through a partnership between the Business for Social Responsibility Education Fund (BSREF) and World-Class Industrial Network (WIN), a project development and management consulting firm active in facilitating business

networks in the Pittsburgh area. A core of three people from BSREF and WIN primarily staffed the program. Others from both organizations have participated as needed. Objectives of the program have included:

- creating a business leadership core in Southwestern Pennsylvania to advance socially responsible business practices;
- providing companies with useful tools to make energy and environmental improvements;
- leveraging the tools and resources of BSREF and other organizations;
- measuring performance and reporting results;
- documenting and disseminating the experience to benefit businesses regionally and nationally; and
- developing an ongoing network.

The PBEP operates primarily by using networking and one-to-many mentoring models. Its focus has been on encouraging exchange of information among companies. Although the issues addressed are environmental, PBEP has approached them from the viewpoint of their potential to cut costs and increase a business' competitiveness. The PBEP staff act as facilitators of the partnership, not as technical experts, though they provide advice to individual companies if asked and have been comfortable promoting participation in voluntary government programs such as Green Lights and Climate Wise.

The partnership has sponsored workshops using presenters from companies and outside experts. Workshop topics have included optimizing compressed air systems, environmental accounting, minimizing metalworking fluid and wastewater, optimizing lighting and green building design. The topics have been chosen to appeal to a broad manufacturing audience — that is, they tend not to be process-specific, but to deal with issues such as energy management, packaging and waste management that are common across many kinds of companies. The workshop format has usually been from 8 a.m. to 3 p.m. with a one-hour networking lunch. Workshops have typically included one or more presentations and a roundtable discussion or action-planning exercise. Each workshop includes a brief needs assessment and concludes with an evaluation. In some cases, PBEP has co-sponsored workshops with the Pollution Prevention Roundtable, funded by the Pennsylvania Department of Environmental Resources. The two networks complement each other because the P2 Roundtable provides compliance-related informa-

tion, while PBEP is focused strictly on non-regulatory issues. Attendance at the workshops has ranged from 15 to 50 individuals.

In several instances, PBEP has worked one-on-one with a company participating in the partnership to provide some direct technical assistance or to facilitate the use of services, such as on-site audits, available through other organizations.

Measures of Success

PBEP has tracked measures of program activity, such as the number of companies and individuals involved and the number of participants in workshops. It documented case studies of improvements made by several of the companies participating for use in program activities and reports to the program sponsor. In 1999, PBEP staff interviewed five of the most actively involved companies to document environmental improvements and further needs for information. However, the companies in some cases lacked documentation or used inconsistent measures, so the information has been difficult to accumulate.

Successes and Challenges

The PBEP has involved about 140 individuals from 80 to 90 companies in its activities. Individuals from a core group of about 15 companies regularly attend the workshops and participate in working group and Steering Committee meetings. PBEP staff cite several practices as helpful in building the network and holding successful events:

- initiating the program with a series of one-on-one meetings with leading companies and those active in other networks to build interest in PBEP, and understanding the needs of the companies, and gathering ideas for productive issue areas for the partnership to address;
- structured brainstorming with small and midsize companies about their needs for environmental and business efficiency information;
- supplementing the one-on-one approach with research into local industries that might benefit from the partnership;
- using core participants to help identify other companies and individuals to invite;

- producing attractive, concise meeting announcements and fax-back forms to encourage participation in the workshops;
- following up on mailings with phone calls to encourage attendance;
- calling registrants prior to the event to further tailor the agenda to their needs;
- producing meeting summaries in the form of a newsletter to make them more likely to be read;
- following up with new participants after the event through a phone call or meeting;
- including participant input into shaping the meetings and workshops and written evaluations of each event.

PBEP staff have generally found that their less-successful events have addressed topics generated by PBEP staff or their organizations, rather than through consultation with the participants.

An ongoing challenge has been identifying the most productive use of time supporting the Partnership. For example, consultation with participants and follow-up to ensure good attendance at events are important to ensure the success of the events but are time-consuming and reduce the opportunity to carry out other program activities such as documenting results consistently.

SANTA CLARA COUNTY POLLUTION PREVENTION PROJECT: Silicon Valley Takes a Byte Out of Pollution

The Santa Clara County Pollution Prevention Program (SCCPPP) was created to address issues identified through a hazardous waste management planning process mandated by the State of California in the late 1980s. Santa Clara County encompasses most of “Silicon Valley,” including hundreds of facilities that manufacture components for electronic products. Counties were required to develop for state approval hazardous waste management plans that characterized the types, source, and volumes of hazardous waste generated; how the wastes were treated or disposed; and what additional hazardous waste management capacity was needed. A key element of the county’s plan was to reduce the hazardous wastes requiring management, rather than expand management capacity.

County authorities identified priority waste streams and environmental issues. The Santa Clara/San Jose area was identified as the biggest discharger of hazardous materials to the shallow southern part of San Francisco Bay. Companies with large discharges were the first to be required to audit their wastewater discharges and implement technological changes to reduce their discharges. Santa Clara County saw an opportunity to build on the experience of the larger dischargers and help further reduce waste by transferring information about pollution-prevention technologies to small and medium-size businesses.

SCCPPP is a separate program housed within the County Environmental Resource Agency. It has no regulatory role; participation in all of its programs is strictly voluntary. The program encompasses several initiatives aimed at helping a variety of small to midsized firms cut hazardous waste generation, including a mentoring project, newsletters, and technical workshops. SCCPPP also sponsors a “green business” project that awards various levels of recognition to companies achieving compliance and those implementing beyond-compliance programs.

The mentoring project focuses on two industries associated with discharge of hazardous materials — printed circuit board manufacturing and metal finishing. There are about 200 metal finishing and 70 to 80 printed circuit board companies in Santa Clara County. The objectives of the project include transferring experience with successful pollution prevention (P2) approaches to smaller companies in these two industries and reducing hazardous discharges. The program focuses on P2 rather than compliance; however, the program considers compliance to be a baseline for further environmental achievements and provides some assistance to companies, for example, by including compliance information in its newsletters.

The SCCPPP’s primary program activities have included organizing and sponsoring technology-oriented workshops (one-to-many mentoring). It has also acted as a “matchmaker” for one-to-one business-to-business mentoring.

The basic format of SCCPPP workshops is an extended lunch from 11:30 a.m. to 2:30 or 3:00 p.m., including panel presentations and discussion. SCCPPP charges a nominal fee for the workshops to cover the cost of lunch and reinforce the value of the service. Initially, in the first series of workshops begun in 1993, the presenters were industry consultants and equipment vendors with direct experience in the applicability of the technology to the PCB and/or MF industries. SCCPPP found these kinds of people effective at explaining the technology and its applications and answering questions. As the local industry became familiar with the value of the workshops and a network of companies interested in using P2 technologies developed, it became possible to recruit business leaders as particularly effective and credible presenters. Over time, some “mentees” — participants in earlier workshops who implemented techniques discussed — became “mentors” (presenters) in later workshops.

In 1995, the program received a grant to support expansion of the workshops and a venture into promoting one-to-one mentoring. SCCPPP sponsored eight workshops and offered to match companies interested in exploring a particular P2 technique or technology with a company experienced in using it. Often, this took the form of arranging a site visit with the experienced company. SCCPPP staff sometimes participated in the site visit and sometimes simply set it up. Most such relationships tended to be of short duration, consisting of a single meeting or site visit. SCCPPP staff found the one-to-one mentoring to be generally less fruitful than the workshop format, for three reasons:

- arranging one-to-one mentoring opportunities can be very time-consuming;
- although some potential mentor companies were open to the idea of sharing their experience with others, some balked at the prospect of helping competitors or allowing them access to the mentor company facility; and
- many one-to-one contacts occurred at, or were facilitated by the workshops, where someone with a question and someone with an answer would talk over coffee, exchange cards, etc.

Measures of Success

The SCCPPP has tracked various measures of program activity such as the number of participants. In

addition, it uses written evaluations of workshops. These evaluations are used to fine-tune the workshop format and to solicit questions and ideas for future topics to ensure that the workshops remain on target. The staff maintains contact with participants in the programs and is familiar with changes the companies are implementing. However, there has not been sustained, systematic documentation of program results.

Successes and Challenges

The SCCPPP has found the workshop format to be very effective for several reasons:

- the workshop format is a good fit for the time constraints of smaller firms — occurring over a long lunch, the workshop requires a relatively modest investment of time and money to receive targeted, practical information;
- the workshop format promotes informal networking among companies with varying levels of knowledge and experience;
- because SCCPPP staff expressed their role as conveners and not technical experts or regulators, participants “on the ragged edge of compliance” felt able to ask questions and get their problems solved;
- participants can learn from one another’s questions as well as ask their own;
- presenting at a workshop can provide a form of recognition within their industry for “early adopters” of pollution-prevention technology.

Among the challenges faced by the program has been its location within a government regulatory agency. Particularly in the early years of the program, some companies were skeptical that the program was strictly voluntary and that there was no hidden enforcement agenda. The keys to overcoming the skepticism were up-front networking and, eventually, experience with the individuals and the SCCPPP.

Another issue was the resistance of the smaller firms to changing their manufacturing processes. Given the huge risks in altering a manufacturing process, many firms need a high level of confidence that a technology is available, tested, and will work in their exact setting. Other companies, however — the “early adopters” — are less risk-averse and more willing to try something new. Identifying and cultivating these early adopters was key to developing a set of mentors who had credibility within their industry to promote change.

WASTECAP OF MASSACHUSETTS: A Waste-Wise Public-Private Partnership

WasteCap of Massachusetts was established in 1994 as a public-private partnership between Massachusetts businesses and the state's Department of Environmental Protection (DEP). The coalition of businesses supporting WasteCap came together to oppose a ballot initiative that would have set mandatory packaging standards for Massachusetts companies. The companies and associations argued that increasing waste reduction and recycled-material-use goals would be better accomplished by sponsoring a business-led program aimed at providing practical resources to Massachusetts businesses. Following the defeat of the ballot initiative, the business coalition teamed with the DEP to create WasteCap.

WasteCap is funded equally by government agencies (mainly Massachusetts DEP) and private, often corporate, donations. All of its services are provided at no charge, though some firms that receive services make a donation to WasteCap. In addition to its small staff, WasteCap has recruited and trained an active group of about 50 volunteers from Massachusetts companies. Their mission is to educate and advise businesses and institutions on the benefits and processes of minimizing and recycling nonhazardous solid waste through its business-to-business network.

WasteCap has a number of programs, including:

- site visits — a waste assessment service staffed by WasteCap and volunteers from companies and other organizations;
- launching small-business recycling cooperatives;
- open house tours of companies that recycle or utilize recycled materials;
- surplus inventory donation program;
- pilot project with municipal governments providing information on reusing and recycling construction and demolition wastes to building permit applicants;
- “Race to Recycle” — a competition among large office buildings to see which can recycle the most;
- telephone technical assistance;
- resource guides — for example, a business guide to materials reuse, a directory of recycled product suppliers, and another on recycling services; and
- a Web site and newsletters.

WasteCap reached more than 4,500 companies with these programs in 1999, up from about 1,600 in its first year.

WasteCap offers site visits to any company requesting one, usually about 20 to 25 companies per year. About half are team visits that include one or more volunteer technical experts from companies, consultants, or public agencies. Before the site visit, program staff send a questionnaire to identify the company's major concerns. WasteCap reviews the form to prepare for the visit and identify the best volunteer(s). Generally, it tries to assign a volunteer from a same or related industry. Volunteers sign a confidentiality agreement covering their work with companies receiving WasteCap services.

The site visit consists of a several-hour tour of the facility at which the company discusses its waste reduction challenges and the team looks for areas of possible improvement. The team discusses technical options and also organizational issues, such as how to get support of top management, or how to encourage workers to segregate wastes. Following the visit, WasteCap staff prepare a report to the company that was visited, recommending improvements and requesting follow-up information on which recommendations are adopted and their impact on the facility's waste generation and management. To minimize demands on volunteers and protect the visited company's confidentiality, volunteers are not involved in the report-writing process. WasteCap also sends a follow-up evaluation form for the company to complete.

Another service is the open house tour program. WasteCap organizes five or six of these tours a year. The tours are two- to four-hour demonstrations of exemplary waste reduction, recycling, or processing and manufacturing recycled materials programs. A representative of the host company makes a presentation on programs and leads a facility tour. The open house format encourages informal networking.

Measures of Success

WasteCap gathers information on various measures of program activity, such as the number of site visits, open houses, etc. It also collects data on the amounts of waste recycled through the recycling cooperatives and the office recycling challenge. Information provided by

companies that were the subject of a site visit is compiled and included in WasteCap's annual report, although the companies don't always report comprehensive, comparable data.

Successes and Challenges

WasteCap has successfully used its network of business supporters to publicize its programs, identify potential participants and recruit volunteers. For example, the local retail and restaurant associations have sent mailings to their memberships, letting them know of the services available through WasteCap.

WasteCap has found the site visits to be a very effective, if resource-intensive, way to help companies accomplish waste reduction. The unique value of site

visits is that seeing the facility and its waste streams helps the WasteCap team understand the particular challenges faced by the company. The teams also find that they sometimes recognize issues that the company did not identify. WasteCap finds that the business sector volunteers add considerable value to the program, not only through their technical knowledge, but also through their credibility with their counterparts at the company visited and their understanding of the internal organizational issues that may be a key to the success of a waste reduction program.

Many of the firms receiving site visits are medium- to large-size. WasteCap finds site visits to be particularly appropriate for larger companies because their waste streams and waste reduction challenges tend to be unique and solutions need to be custom-designed.

The Institute for Corporate Environmental Mentoring (ICEM) was established in 1998 to explore ways to improve the environmental performance of small and medium-size businesses through the use of low cost, non-regulatory business education programs. Specifically the goal of the institute is to:

Enable education and mentoring that supports business efforts to achieve integrated economic, environmental, and social excellence.

To achieve its mission, ICEM seeks to:

- **advance industrial ecology** as a strategic framework for improving business and environmental performance;
- **provide unique national forums** to engage and empower industry, public stakeholders, educational and government leaders seeking to integrate environmental considerations into business decision making and planning;
- **develop mentoring initiatives** to link companies of all sizes and sectors with environmental leaders; and
- **utilize educational networks and institutions** to develop and deliver innovative curriculum, training, and informational programs.

The Institute is engaged in a number of different types of projects, all geared towards bringing environmental management expertise to small businesses. These include:

Developing Mentoring Resources

- **The Mentor Center:** An Internet resource center for mentoring (www.mentor-center.org); see additional information on page 58.
- **Environmental Mentoring: Benefits, Challenges, and Opportunities for the Business Community:** An

examination of different types of successful environmental mentoring programs.

Strategic Environmental Management Training

- **Industrial Ecology Training & Mentoring Project:** An initiative to develop industrial ecology training workshops for small businesses and establish mentoring networks through the national community college system.
- **Strategic Environmental Management Systems Principles:** An intensive workshop for environmental professionals focusing on industrial ecology and cultivation of management skills.

Forums

- **White House Conference on Corporate Environmental Mentoring:** A one-day forum examining business-to-business mentoring, held in January 1998.
- **Industrial Ecology Workshop For EH&S Professionals:** A one-day workshop on industrial ecology and business strategy for senior environmental professionals, held in January 1999.
- **Defining Environmental Excellence — The Emerging Role of Trade Associations as Mentors:** A forum examining industry sector voluntary initiative and environmental codes of conduct, held in March 2000.

Research

- **Mentoring for New Regulations:** A research initiative to examine the feasibility of designing mentoring initiatives for ensuring compliance with new federal environmental regulations.
- **Greening Corporate Supply Chains:** A research initiative to examine corporate supply chain environmental initiatives and the potential opportunities for mentoring.

- **Incentives and Barriers to Industrial Ecology:** A research initiative with the Interagency Task Force on Material Flows and Industrial Ecology at the President's Council on Environmental Quality, exploring incentives and barriers to industrial ecology initiatives created through federal environmental regulations, reporting policies, and other federal programs.

ICEM is a project of The National Environmental Education & Training Foundation (NEETF), a private, nonprofit organization established by Congress in 1990 as part of the National Environmental Education Act. The foundation's mission is to help America make economic and societal progress through environmental

Institute for Corporate Environmental Mentoring Board of Advisors – Steering Committee

- Jeffrey Adrian, Environmental Director, The John Roberts Company
- Brad Allenby (Co-Chair), Vice President, Environment, Health & Safety, AT&T
- Richard Anderson, Executive Director, Maryland Environmental Business Alliance
- John Atcheson, Acting Director, Office of Planning, Budget and Customer Service, U.S. Dept. of Energy
- Jay Benforado, Deputy Associate Administrator, Office of Policy and Innovation, U.S. Environmental Protection Agency
- Joan Bready, Program Manager, Small Business Development Centers Office, U.S. Small Business Administration
- Karen Brown, EPA Small Business Ombudsman, U.S. Environmental Protection Agency
- Rick Bunch, Director, Management Institute for Environment and Business
- Thomas S. Davis, President, Tom Davis Associates
- Dan Eddinger, Public Advocate, Nebraska Department of Environmental Quality
- Stan Eller, Vice President, Center for Technology Transfer
- Lee Anne Elliott, Executive Director, Voluntary Protection Programs Participants' Association
- Barbara Ennis, Director, Global Environment Affairs, Global Environmental, Health and Safety, Lucent Technologies
- Robert Erhardt, Program Manager, Corpo
- Stephen Evanoff, Manager, Central ESH Services, Lockheed Martin
- Chris Fox, Director, The Environment Project, Catonsville Community College
- Sandy Germann, Program Analyst, Office of Innovation and Policy, U.S. Environmental Protection Agency

learning by using public-private partnerships to connect the environment to issues of national concern such as: health care, education excellence, America's competitive position in the world economy, and effective community participation in managing our natural resources. In addition to awarding grants requiring private matching dollars for outstanding environmental education projects across the country, NEETF runs its own programs including Wellness & the Environment, the Institute for Corporate Environmental Mentoring, National Public Lands Day, and projects in safe drinking water and conservation education. The Foundation also commissions the annual *NEETF/Roper Starch National Report Card on Environmental Knowledge, Attitudes, and Behavior*.

- Arthur Gibson (Co-Chair), Vice President, Environment, Health & Safety, R.R. Donnelley & Sons Co.
- Stuart Hart, Associate Professor of Management, Kenan-Flager Business School, Univ. of North Carolina
- Suellen Keiner, Senior Attorney, Environmental Law Institute
- Byron Kennard, Executive Director, Center for Small Business and the Environment
- Tom Koch, Manager External Relations, BP-Amoco
- Clair Krizov, Stakeholder contact and Needs Analysis Leader, Environment, Health & Safety, AT&T
- Richard Lemaire, Environmental Security Education Program Director, U.S. Department of Defense
- James Martin, Vice President and General Manager, EHS Global Professional Services, Exxon-Mobil
- Woodrow McCutchen, Executive Director, Association of Small Business Development Centers
- Carol Singer Neuvelt, Executive Director, National Association for Environmental Management
- David Rejeski, Executive Director, Environmental Technology Task Force, Council on Environmental Quality
- Jackie Prince Roberts, Senior Scientist, Environmental Defense Fund
- Walt Rosenberg, Director, Corporate Environmental, Health, Safety & Security, Compaq Computer Corp.
- William Shapiro, Director, Regulatory Compliance and Environmental Affairs, Volvo Cars of North America
- Joseph Shimsky, Executive Director, Corporate Safety and Environmental Affairs, Pitney Bowes, Inc.
- Kenneth A. Strassner, Vice President, Environment and Energy, Kimberly-Clark Corporation
- Deborah Thomas, Deputy Director, Environmental Leadership Program, U.S. EPA
- Gregory Waldrip, Environmental Services Manager, Manufacturing Extension Partnership, NIST



The Mentor Center is an online database of more than 300 business-to-business environmental mentoring programs, technical assistance programs, and other programs to help companies address environmental issues. The database is designed to allow users to search for specific mentoring programs based on industry sector, geographical regional, and areas of interest, such as pollution prevention or environmental management systems. The site also provides informa-

tion and other resources that support environmental mentoring. (You may download copies of this Handbook in PDF format from the site.) The Mentor Center was developed in part with support from the U.S. EPA's Office of Innovation and Policy. There is no fee or registration required to use the site.

The Mentor Center is located on the Internet at www.mentor-center.org.

The U.S. EPA has established a number of policies designed to encourage small business to address their environmental performance. The following policies pertain to compliance and enforcement issues. They are designed to create incentives for conducting self evaluations and audits which might lead to a discovery of being out of compliance with federal regulations.

The following provides an introduction to these policies. Users are strongly encouraged to review all primary sources for specific details and accuracy. Also, be aware that many state governments have their own versions of these policies.

Compliance Incentives For Small Businesses Policy*

The basic purpose of this policy is to promote environmental compliance by small businesses by removing barriers to participation with on-site compliance assistance programs, and environmental audits.

Small businesses are defined in the policy as having fewer than 100 employees.

The policy indicates that EPA will remove potential civil penalties for being out of compliance provided the business satisfies the following four criteria:

- The company has made a good-faith effort to comply with applicable regulations (through on-site assistance programs, or voluntary audits and disclosures).
 - The company was not subject to any enforcement actions pursuant to the current violation and has not been subject to two or more enforcement actions for environmental violations in the past five years.
 - The company corrects the violation and remedies any associated harm within six months of discovery; an additional six months may be granted if pollution prevention technologies are used.
- The violation has not caused and does not have the potential to cause serious harm to public health, safety, or the environment; it does not have the potential to present imminent and substantial endangerment to public health or the environment; and it does not involve criminal conduct.

For more information, contact Ginger Gotliffe, U.S. EPA, Office of Regulatory Enforcement, at (202) 564-7072, or go to <http://www.epa.gov/oeca/polguid>.

Policy on Environmental Self-Auditing and Self-Disclosure

The purpose of this policy is to encourage business to voluntarily discover, disclose and correct violations of environmental requirements. The policy seeks to promote a higher standard of self-policing by waiving gravity-based penalties for violations that are:

- promptly disclosed and corrected,
- were discovered through voluntary audits, or
- compliance management systems that demonstrate due diligence.

Additionally, the policy indicates that:

- EPA will reduce gravity-based penalties by 75% when violations are discovered by means other than environmental audits or due diligence efforts, and are promptly disclosed and expeditiously corrected (also assuming certain conditions of the policy are met).
- EPA will not recommend criminal charges to the Department of Justice or other prosecuting authority if EPA determines that certain conditions are met (see Section D of policy).

*This policy is being modified and should be issued by EPA in Spring 2000. The new policy will include expanding the options for discovery to include any method such as training classes and mentoring.

State Audit Privilege, Immunity, and Self Disclosure Laws and Policies (As of February 2000)

States having environmental audit privilege and/or penalty immunity laws.

Privilege and Immunity

Alaska
Colorado
Iowa
Kansas
Kentucky
Michigan¹
Minnesota¹
Montana³
Nebraska
Nevada
New Hampshire¹
Ohio¹
South Carolina²
South Dakota¹
Texas¹
Utah¹

Virginia¹
Wyoming¹

Privilege Only

Arkansas¹
Illinois
Indiana¹
Mississippi
Oregon

Immunity Only

Rhode Island

Note: Oklahoma has adopted a regulation allowing penalty immunity under certain conditions.

States with self-disclosure policies:

California
Connecticut
Delaware
Florida
Maryland
Massachusetts
Minnesota
New Mexico
New York (small businesses only)
North Carolina
Pennsylvania
Tennessee
Vermont
Washington

¹State has enacted statutory revisions and/or issued a clarifying Attorney General's statement to satisfy requirements for federally authorized, delegated or approved environmental programs. ²South Carolina and EPA have reached an understanding as to necessary statutory revisions and the state has issued a clarifying Attorney General's Statement. When amendments are enacted as agreed, the state will satisfy requirements for federally authorized, delegated or approved environmental programs. ³Montana and EPA have entered into a Memorandum of Agreement, based on the audit law's primacy savings clause, that satisfies requirements for federally authorized, delegated or approved environmental programs.

Under both scenarios, however, EPA may still consider recovering fines for economic benefits gained as a result of noncompliance.

For more information, contact Ginger Gotliffe at (202) 564-7072, U.S. EPA, Office Of Enforcement. To visit the EPA Web site on this policy, go to <http://es.epa.gov/oeca/auditpol.html>. To read EPA's interpretive guidance documents, go to <http://www.epa.gov/oeca/polguid>.

Clean Air Act Enforcement Response Policy

This policy was established to encourage small businesses to seek compliance help for the 1990 Clean Air Act Amendments from the state Small Business Assistance Programs (SBAPs). The policy provides firms that work with SBAPs the following options:

- **90-Day Correction Period:** Small businesses have up to 90 days to receive compliance assistance from the SBAPs, with the possibility of an additional 90 days to correct any violations discovered under the

program. After that time, violations would be subject to existing enforcement response policies. State programs offering this correction-period option may not give guarantees that they will keep violations information confidential.

- **Confidentiality Option:** SBAPs may keep information regarding violations detected through SBAP compliance assistance, including the names and locations of the small businesses, confidential. However, the state does retain the ability to investigate or take enforcement actions at any time for violations discovered independently from the Section 507 program. Further, only programs that operate independently from the state's regulatory enforcement program may offer this type of compliance assistance.

To visit EPA's Web site on "Enforcement Response Policy for Treatment of Information Obtained Through Clean Air Act Section 507 Small Business Assistance Programs," go to <http://es.epa.gov/oeca/ccsmd/file11.html>.