Pollution Prevention Plan
2016
Annual Progress Report

Due Date: March 31, 2017

THE FUTURE

SOURCE REDUCTION

RECYCLING

TREATMENT

DISPOSAL

THE PAST
Background

Any business that is a Class A or Class B generator of hazardous waste or that is a Large User of toxic substances (see definitions section) must develop a Pollution Prevention (P2) Plan. Plans must be updated every three years. The present 3-year planning cycle extends from July 1, 2014 through July 1, 2017.

This Annual Progress Report is intended to help your facility evaluate its own efforts in achieving reduction goals that have been established on Worksheet 10 of your Pollution Prevention Plan. It is used by the Environmental Assistance Office to assess overall change from year to year in waste generation or chemical use by Vermont companies. Unlike the Plan, the Progress Report is a public record.

In completing this 2016 Annual Progress Report it will be very helpful to have last year’s Report available.

**Definitions**

**Class A Generator** means a generator that generates 2,200 pounds or more of hazardous waste in one calendar month.*

**Class B Generator** means a generator that generates more than 220 pounds but less than 2200 pounds of hazardous waste in one calendar month and generates more than 2640 pounds of hazardous waste in one calendar year.*

* For purposes of determining if your facility is a Class A or Class B Pollution Prevention Planner, only include the weight of hazardous wastes that are routinely generated. Wastes generated due to site remediation or cleanup of a rare spill incident are considered non-routine and should not be included in monthly totals. If you are unsure as to whether a particular waste stream is subject to the plan requirement, please call us at 802-522-0469.

**Large User of a Toxic Substance(s)** means a manufacturing facility with ten or more full-time employees that is in Standard Industrial Classification (SIC) Code 20-39 and that:

(i) manufactures, processes or otherwise uses more than 10,000 lbs/yr of a toxic substance; or

(ii) more than 1,000 lbs/yr if that amount accounts for 10% or more of the total of toxic substances manufactured, processed or otherwise used at the facility during the year.
**Toxic Substance** means any substance in a gaseous, liquid or solid state listed pursuant to Title III, Section 313 of the Superfund Amendments and Reauthorization Act (SARA) of 1986. The SARA Title III, Section 313 list of toxic substances for the 2016 reporting year can be found by going to: [http://www2.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals](http://www2.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals) and selecting the “TRI Chemical List for RY 2016.” We have also placed a copy of the 2016 list on our forms page: [http://dec.vermont.gov/environmental-assistance/pollution-prevention/forms](http://dec.vermont.gov/environmental-assistance/pollution-prevention/forms).

**Fee Calculation**

**Class A Generators**, $400 per hazardous per waste stream up to a maximum of $2000.

If two (or more) hazardous waste streams share the *identical* waste code(s), they are assessed as a single waste stream for fee purposes. For example, assume a facility has two (or more) waste streams from separate processes that are coded VT02, D001. The applicable fee is $400 because the identical codes are used. However, if one of the waste streams carries the code VT02 only, and the other is VT02, D001, the applicable fee is $800 because the wastes are not coded identically.

**Class B Generators**, a flat fee of $400, regardless of the number of hazardous waste streams and how they are coded.

**Note:** For both Class A and Class B Generators, fees apply only to hazardous wastes that are routinely generated and that comprise at least 5% of the total weight of all hazardous waste generated at the facility during the year. Wastes generated due to cleanup of a rare spill incident are considered non-routine and are not subject to fees. If you are unsure whether a particular waste stream is subject to planning and fees, please call 802-522-0469.

**Large Users of Toxic Substances**, $400 per toxic substance up to a maximum $2000.

**Class A Generators that are also Large Users of Toxic Substances**, $400 per hazardous waste stream (see discussion under Class A Generators above) plus $400 per toxic substance up to a maximum of $4000.

**Class B Generators that are also Large Users of Toxic Substances**, $400 flat fee for hazardous waste plus $400 per toxic substance up to a maximum of $1200.

**Questions:** If you have questions about this Progress Report, please contact Lynn Metcalf at **1-802-522-0469**. The form is also available in Microsoft Word or PDF format; call or send an email request to **lynn.metcalf@vermont.gov** or visit our website: [http://dec.vermont.gov/environmental-assistance/pollution-prevention/forms](http://dec.vermont.gov/environmental-assistance/pollution-prevention/forms) .
I. Facility Information and Certification

Facility Name & Town: ____________________________________________________________

Facility Mailing Address: ________________________________________________________

Contact Person: ________________________________________________________________

Telephone: ________________________________

E-mail Address: ________________________________

Current Year Planning Status: (check one)

☐ Class A Generator  ☐ Class B Generator & Large User
☐ Class B Generator  ☐ Large User
☐ Class A Generator & Large User  ☐ Exempt *

* If your facility did not exceed planning thresholds for hazardous waste generation or toxic substance use in 2016 and you would like to request an exemption, complete this report but do not submit the annual fee.

Certification: I certify that the information provided in this report and all attached documents is true, accurate, and complete to the best of my knowledge and belief.

SIGNATURE: __________________________________________ DATE: ________________

TITLE: ________________________________________

(This report must be signed by an officer of the company or the person responsible for the operation of the site.)
II. Hazardous Waste Generation Information

This information only needs to be provided by Class A and Class B generators. Report all hazardous waste streams that were subject to planning in 2015 (even if a particular waste stream was eliminated or represented less than 5% of the annual total in 2016). Include any “new” waste streams generated in 2016 that are subject to planning. Please list the quantity in pounds and as a percentage of the total amount of hazardous waste generated at the facility for the year. Do not list non-hazardous waste streams such as those with a VT99 waste code.

<table>
<thead>
<tr>
<th>EPA OR VT WASTE CODE(S)</th>
<th>Name of Hazardous Waste Stream</th>
<th>Process Generating Waste Stream</th>
<th>ANNUAL QUANTITY GENERATED</th>
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<tbody>
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<td>2016</td>
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Total of Hazardous Waste Reported
III. Annual Hazardous Waste Reduction Progress

The purpose of this section is to report progress made by Class A and Class B generators in reducing hazardous waste generation during 2016 relative to 2015. Only report reductions attributable to implementation of a reduction measure as opposed to a downturn in business. It is possible to realize a reduction, on a per unit basis, even though yearly generation may have increased as a result of increased production (see Section VI, Production Index).

<table>
<thead>
<tr>
<th>Reduction Measure Code</th>
<th>Hazardous Waste Stream Affected</th>
<th>Briefly Describe the Reduction Measure Implemented</th>
<th>Amount Reduced in Pounds from 2015 to 2016</th>
<th>Was This Reduction Opportunity Identified on Worksheet 10 of your P2 Plan?</th>
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<tbody>
<tr>
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Total Reduction Attributable to Hazardous Waste Reduction Measures

Reduction Measure Codes:
PC - Process Change
PM - Product Modification
IS - Input Substitution
IR - In-Process Recycling
OM - Improved Operations/Maintenance
SP - Spill/Leak Prevention
IC - Improved Inventory Control
OR - Recycling Outside Process
PE - Process Elimination
EU - Equipment Upgrade
IV. Toxic Substance Use Information

This information is only required to be provided by manufacturers that are "Large Users" of toxic substances (see definitions). Facilities must report toxics use by the same method selected in their Plan on Worksheet 4, that is, either by the Product Approach or by the Chemical Approach.

**Product Approach** - If the product approach is used, list in the first column of the table below those products that were used in a manufacturing process that meet any of the following criteria. Report on all products that were subject to planning in 2015 even if use of those products fell below planning thresholds in 2016.

Products that:  
- a. contain 50% or more toxic substances and more than 2,000 pounds were used,  
- b. contain between 25 and 49% toxic substances and more than 4,000 pounds were used,  
- c. contain between 10 and 24% toxic substances and more than 10,000 pounds were used.

For each product listed in the first column, indicate the process(es) in which the product was used, the total weight of all toxic substance(s) used in each of the years shown, and to what media the product/chemical was released.

**Chemical Approach** - If the chemical approach is used, list in the first column of the table below any toxic substances where (a) more than 10,000 pounds were used during 2016 OR (b) more than 1,000 pounds were used in 2016 and that amount exceeded 10% of all the toxic substances used at the facility for the year. Report on all chemicals that were subject to planning in 2015 even if use of those chemicals fell below planning thresholds in 2016.

For each of the chemicals listed in the first column, indicate the process(es) in which the chemical was used, the total weight of that chemical for the years shown, and to what media the product/chemical was released.

<table>
<thead>
<tr>
<th>PRODUCT OR CHEMICAL</th>
<th>PROCESS(ES) WHERE USED</th>
<th>ANNUAL TOXICS USE</th>
<th>Where product or chemical is released to the environment, specify receiving media using codes listed below.*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>2016 (pounds)</td>
<td>2015 (pounds)</td>
</tr>
<tr>
<td>Sum of Toxic Substances Used</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* If the use of the product/chemical results in a release to the environment, such as an air emission, wastewater discharge, or generation of a hazardous or solid waste, please identify the media to which the material is released as either: AE, an air emission; WW, a wastewater discharge; HW, for generation of a hazardous waste or SW, for a solid waste.
V. Annual Toxics Use Reduction Progress

The purpose of this section is to report progress made by Large Users in reducing the use of toxic substances during 2016 relative to 2015. Only report reductions attributable to implementation of a reduction measure, as opposed to a downturn in business. It is possible to realize a reduction, on a per unit basis, even though yearly toxic substance use may have increased as a result of increased production (see Section VI, Production Index).

<table>
<thead>
<tr>
<th>Reduction Measure Code</th>
<th>Toxic Substance Affected</th>
<th>Briefly Describe the Reduction Measure Implemented</th>
<th>Amount Reduced in Pounds from 2015 to 2016</th>
<th>Was This Reduction Opportunity Identified on Worksheet 10 of your P2 Plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Y or N</td>
</tr>
</tbody>
</table>

Total Reduction Attributable to Toxic Use Reduction Measures

Reduction Measure Codes:

- **PC** - Process Change
- **PM** - Product Modification
- **IS** - Input Substitution
- **OM** - Improved Operations/Maintenance
- **SP** - Spill/Leak Prevention
- **IC** - Improved Inventory Control
- **IR** - In-Process Recycling
- **PE** - Process Elimination
- **EU** - Equipment Upgrade
VI. Production/Service Index

Pollution prevention progress should be measured relative to changing production/service levels. This is done by comparing units of production/service during 2016 with units of production/service for 2015. The ratio is referred to as the production index. This index will be greater than 1.0 if production has increased and less than 1.0 if it has decreased. If you manufacture multiple products or provide significantly different services, it may be useful to develop a production index for each product or service that uses toxic substances or generates hazardous waste. Please provide a production index for 2016 in the space provided below.

**Example:**

<table>
<thead>
<tr>
<th>Production/Service Level</th>
<th>2016</th>
<th>120,000 units</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015 Product/Service Level</td>
<td>100,000 units</td>
<td></td>
</tr>
</tbody>
</table>

\[ \text{Production Index} = \frac{120,000}{100,000} = 1.2 \]

**2016 Production Index:** __________

Please provide a brief description of any applicable factors present during the current year that may have affected hazardous waste or toxics use reduction including: change in business activity, change in waste classification, natural phenomena or other factors affecting the quantity of waste generated or waste management practices used at the facility.

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

Staff of the Environmental Assistance Office are available to assist companies with preparation of pollution prevention plans, annual progress reports and identification and assessment of potential toxics use or hazardous waste reduction opportunities. Please call us at **802-522-0469** if we can help.