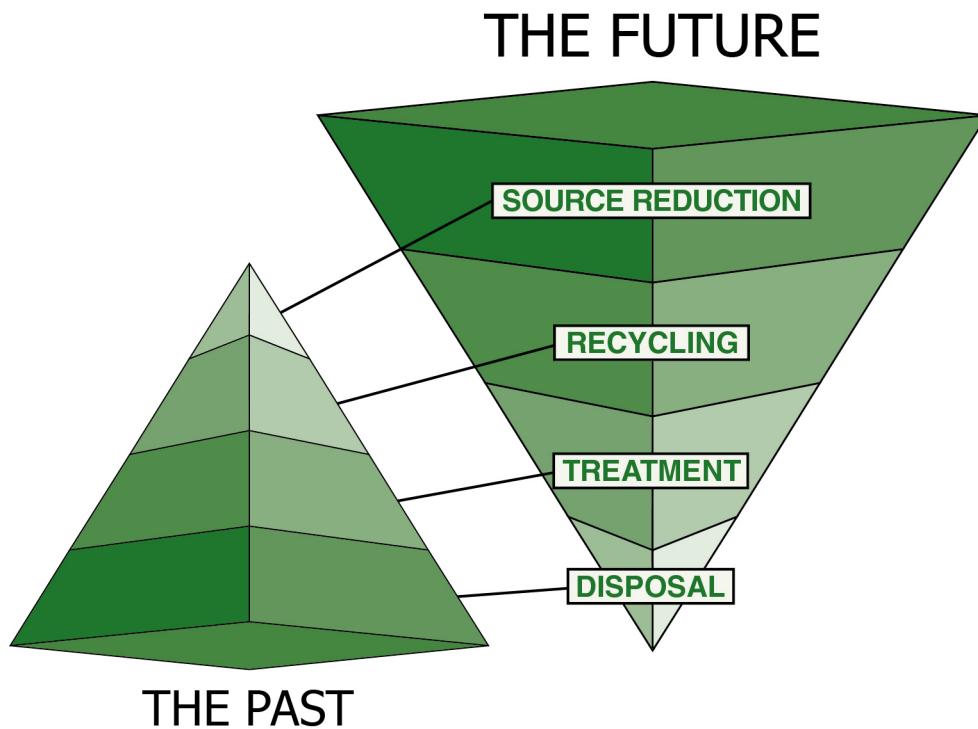


# Pollution Prevention Plan 2019 Annual Progress Report

Due Date: March 31, 2020





**Vermont Department of Environmental Conservation**

Environmental Assistance Office  
One National Life Drive, Davis 3  
Montpelier, VT 05620-3803  
[phone] 802-522-0469

*Agency of Natural Resources*

**2019 Pollution Prevention Annual Progress Report and Fee Due March 31, 2020**

**Dear Pollution Prevention Planner:**

Please find the enclosed form for the 2019 Annual Progress Report on Pollution Prevention (P2). Progress reports are required for all pollution prevention planners to evaluate progress made in 2019 implementing pollution prevention initiatives. Ideally, those initiatives were identified in your 2017 P2 Plan.

The Progress Report form is also available in either Microsoft Word or Adobe Acrobat PDF format on our Pollution Prevention Forms webpage:

<http://dec.vermont.gov/environmental-assistance/pollution-prevention/forms> .

The electronic versions still need to be printed, signed and returned to our office with the appropriate fee.

Please read the Fee Calculation directions on the attached form as calculating the correct fee amount can be confusing AND please do not hesitate to call me at **802-522-0469** if you have questions or send me an e-mail ([lynn.metcalf@vermont.gov](mailto:lynn.metcalf@vermont.gov)) and I will get back to you.

In addition, we have an Excel spreadsheet (P2FeeCalc) that calculates the fee based on your inputs of hazardous waste streams and/or toxic substances. If you have multiple waste streams and toxic substances, this tool may help. If you'd like to try it, the P2FeeCalc spreadsheet is available on our Pollution Prevention Forms webpage listed above.

Finally, if you believe that your facility fell below the thresholds in 2019 for a Class B Generator of hazardous waste and/or a Large User of toxic substances, please indicate this by checking "exempt" under "current year planning status" on the first page of the form. You still must complete and submit the form in its entirety, but no fee is required.

***Please send the completed form and fee, payable to "Treasurer, State of Vermont" by March 31, 2020 to:***

**VTDEC - Environmental Assistance Office  
Attn: Lynn Metcalf  
1 National Life Drive, Davis 3  
Montpelier, VT 05620-3803**

Sincerely,

A handwritten signature in cursive script that reads "Lynn Metcalf".

Lynn Metcalf  
Pollution Prevention Specialist

## **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, 2017 through July 1, 2020.

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 the 2019 Annual Progress Report it will be helpful to have last year's Report available.*

**Due Date: March 31, 2020**

Checks should be made payable to **"Treasurer, State of Vermont"**.

**Please send the completed report and fee payment to:**

VT DEC/ Environmental Assistance Office  
Attn: Lynn Metcalf  
1 National Life Drive, Davis 3  
Montpelier, VT 05620-3803

## **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 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, also known as the Toxics Release Inventory (TRI). The SARA Title III, Section 313 list of toxic substances for the latest TRI reporting cycle can be found by going to: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals> and selecting the “TRI Chemical List for RY 2018.” We have also placed an Excel spreadsheet of the 2018 TRI Chemical List on our forms page: <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 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 fee for each hazardous waste stream 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 **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](mailto:lynn.metcalf@vermont.gov) or visit our website: <http://dec.vermont.gov/environmental-assistance/pollution-prevention/forms>.

**2019**  
**Pollution Prevention Plan**  
**Annual Progress Report**

**I. Facility Information and Certification**

**Facility Name & Town:** \_\_\_\_\_

**Facility Mailing Address:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Contact Person:** \_\_\_\_\_

**Telephone:** \_\_\_\_\_

**E-mail Address:** \_\_\_\_\_

**Current Year Planning Status: (check one)**

- |   |   |
|---|---|
| <input type="checkbox"/> Class A Generator              | <input type="checkbox"/> Class B Generator & Large User |
| <input type="checkbox"/> Class B Generator              | <input type="checkbox"/> Large User                     |
| <input type="checkbox"/> Class A Generator & Large User | <input type="checkbox"/> Exempt*                        |

*\* If your facility did not exceed planning thresholds for hazardous waste generation or toxic substance use in 2019 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 2018 (even if a waste stream was eliminated or represented less than 5% of the annual total in 2018). Include any “new” waste streams generated in 2019 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.

WASTE STREAM			ANNUAL QUANTITY GENERATED			
EPA OR VT WASTE CODE(S)	Name of Hazardous Waste Stream	Process Generating Waste Stream	2019		2018	
			pounds	percent	pounds	percent
<b>Total of Hazardous Waste Reported</b>						

### 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 2019 relative to 2018. 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).

Reduction Measure Code	Hazardous Waste Stream Affected	Briefly Describe the Reduction Measure Implemented	Amount Reduced in Pounds from 2018 to 2019	Was This Reduction Opportunity Identified on Worksheet 10 of your P2 Plan? Y or N
<b>Total Reduction Attributable to Hazardous Waste Reduction Measures</b>				

**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 2018 even if use of those products fell below planning thresholds in 2019.

- 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 2019 **OR** (b) more than 1,000 pounds were used in 2019 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 2018 even if use of those chemicals fell below planning thresholds in 2019.

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.

PRODUCT OR CHEMICAL	PROCESS(ES) WHERE USED	ANNUAL TOXICS USE		Where product or chemical is released to the environment, specify receiving media using codes listed below.*
		2019 (pounds)	2018 (pounds)	
<b>Sum of Toxic Substances Used</b>				

\* 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 2019 relative to 2018. 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).

Reduction Measure Code	Toxic Substance Affected	Briefly Describe the Reduction Measure Implemented	Amount Reduced in Pounds from 2018 to 2019	Was This Reduction Opportunity Identified on Worksheet 10 of your P2 Plan?  Y or N
<b>Total Reduction Attributable to Toxic Use Reduction Measures</b>				

**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 2019 with units of production/service for 2018. 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 2019 in the space provided below.

**Example:**    *2019 Production/Service Level*     $\frac{120,000 \text{ units}}{100,000 \text{ units}}$     = **Index of 1.2**  
                  *2018 Production/Service Level*

**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.

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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.