

2020 POLLUTION PREVENTION PLAN ANNUAL PROGRESS REPORT (Electronic Version)

Electronic Reporting

Due to COVID-19, the requirement to submit a paper copy of the Pollution Prevention Plan Annual Progress Report has been waived provided that a signed, electronic copy can be submitted. Please note that Annual fee payments are encouraged to be made through ANR Online. If you have questions about this form, please contact:

Michael Nucci at (802) 522-0287 michael.nucci@vermont.gov, **Cindy Grimes** at (802)-522-0307 cindy.grimes@vermont.gov, or **Anna Bourakovsky** at (802)-477-2981 anna.bourakovsky@vermont.gov

If you have any questions about making payments, please contact:
Wendy Edwards at (802)522-0261 wendy.edwards@vermont.gov

Due Date: March 31, 2021

Payments are encouraged to be made through ANR Online: <https://anronline.vermont.gov/>

If you do not have access to ANR Online, checks can be submitted. Checks should be made payable to "Treasurer, State of Vermont"

Fee payments (and paper copies) of the report can be mailed to:

VT DEC/Environmental Assistance Office
1 National Life Drive, Davis 1
Montpelier, VT 05620-3704
Attn: Wendy Edwards

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, 2020 through July 1, 2023.

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.

Note: In completing the 2020 Annual Progress Report it will be 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 Pollution Prevention Planning, only include the weight of hazardous wastes that are routinely generated. Hazardous waste generated due to site remediation or cleanup of a rare spill incident is considered non-routine and therefore not subject to planning (or fees).

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 2020.**” We have also placed an Excel spreadsheet and PDF version of the 2020 TRI Chemical List on our forms page: <http://dec.vermont.gov/environmental-assistance/pollution-prevention/forms>.

Fee Calculation

Class A Generators, \$400 per hazardous 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 and both are coded VT02, D001. The applicable fee is \$400 total for the two waste streams because the identical codes are used. However, if one of the waste streams is coded VT02 only and the other waste stream is coded VT02 D001, the applicable fee is \$800 because the codes are not identical.

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 only apply 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. Hazardous wastes generated due to site remediation or cleanup of a rare spill incident are considered non-routine and are not subject to fees.

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 hazardous waste plus \$400 per toxic substance up to a *maximum of \$1200*.

Questions:

If you are unsure whether a waste stream is subject to planning (and fees), or if you have questions about this Progress Report form, please contact: **Michael Nucci** at (802) 522-0287 michael.nucci@vermont.gov or **Cindy Grimes** at (802)-522-0307 cindy.grimes@vermont.gov. The form is also available in PDF format on our [Forms page](#).

2020

POLLUTION PREVENTION PLAN ANNUAL PROGRESS REPORT

I. Facility Information & Certification

Note: If you need more than one line to enter your information (e.g. facility address) use the "ENTER" key to move down a line in the shaded box.

Facility Name & Town:

Facility Mailing Address:

Contact Person:

Telephone Number:

E-mail Address:

Current Year Planning Status:

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

If your facility did not exceed planning thresholds for hazardous waste generation or toxic substance use in 2018 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 waste streams that were subject to planning in 2019 (even if a waste stream was eliminated or represented less than 5% of the annual total in 2020). Also include any “new” waste streams generated in 2020 that are subject to planning. Please give 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	2020		2019	
			pounds	percent	pounds	percent
Total of Hazardous Waste Generated			0		0	

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 2020 relative to 2019. Only report reductions attributable to implementation of some 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	Reduction Amount in Pounds from 2019 to 2020	Check the box below if this reduction opportunity was identified on Worksheet 10 of your Plan.
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
Total Reduction Attributable to Hazardous Waste Reduction Measures			0	

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

Sum of Toxic Substances Used		0	0	

* 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 2020 relative to 2019. Only report reductions attributable to implementation of some 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(s)	Toxic Substance Affected	Briefly Describe the Reduction Measure Implemented	Amount Reduced in Pounds from 2019 to 2020	Check the box below if this reduction opportunity was identified on Worksheet 10 of your Plan.
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
Total Reduction Attributable to Toxic Use Reduction Measures			0	

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 Level

Pollution prevention progress should be measured relative to changing production/service levels. This is done by comparing units of production/service during 2020 with units of production/service for 2019. 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 2020 in the space provided below.

Example: *2020 Production/Service Level = 120,000* $\frac{120,000}{100,000} = \text{Index of 1.2}$
 2019 Production/Service Level = 100,000 *100,000*

2020 Production/Service Factor:

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 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 contact:

Michael Nucci at (802) 522-0287 michael.nucci@vermont.gov, or
Cindy Grimes at (802)-522-0307 cindy.grimes@vermont.gov.