## 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**](mailto:michael.nucci@vermont.gov)**, Cindy Grimes at (802)-522-0307** [**cindy.grimes@vermont.gov**](mailto:cindy.grimes@vermont.gov)**, or Anna Bourakovsky at (802)-477-2981** [**anna.bourakovsky@vermont.gov**](mailto:anna.bourakovsky@vermont.gov)

If you have any questions about making payments, please contact:

**Wendy Edwards at (802)522-0261** [**wendy.edwards@vermont.gov**](mailto:wendy.edwards@vermont.gov)

**Due Date: March 31, 2021**

**Payments are encouraged to be made through ANR Online:** [**https://anronline.vermont.gov/**](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 ourforms 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), orIf you have questions about this Progress Report form, please contact: **Michael Nucci** at **(802) 522-0287** [michael.nucci@vermont.gov](mailto:michael.nucci@vermont.gov) **or Cindy Grimes** at **(802)-522-0307** [cindy.grimes@vermont.gov](mailto:cindy.grimes@vermont.gov).

The form is also available in PDF format on our [Forms page](https://dec.vermont.gov/environmental-assistance/pollution-prevention/forms).

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| **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: | | | |  | | | |
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| Facility Mailing Address: | | | |  | | | |
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| Contact Person: | | | |  | | | |
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| Current Year Planning Status: | | | | **Class A** |  | | |
| **Class B** |  | | |
| **Large User** |  | | |
| **Class A & Large User** |  | | |
| **Class B & Large User** |  | | |
| **Exempt\*** |  | | |
| **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.** | | | | | | | |
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| 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: | **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |
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| Title: |  | | | | |  | |
| ***This report must be signed by an officer of the company or the person responsible for the operation of the site.*** | | | | | | | |
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# 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.

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| **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** |
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| 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).

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| **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.** |
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| **Total Reduction Attributable to Hazardous Waste Reduction Measures** | | | **0** |  |

**Reduction Measure Codes:**

**PC** - Process Change **OM** - Improved Operations/Maintenance **OR** - Recycling Outside Process

**PM** - Product Modification **SP** - Spill/Leak Prevention **PE** - Process Elimination

**IS** - Input Substitution **IC** - Improved Inventory Control **EU** - Equipment Upgrade

**IR** - In-Process Recycling

# 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, 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 criteria below. Report on all products that were subject to planning in 2019 even if use of those products fell below planning thresholds in 2020.

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 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 2020 **OR** (b) more than 1,000 pounds were used in 2020 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 2019 even if use fell below planning thresholds in 2020.

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 used for the years shown, and to what media the chemical was released.

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| PRODUCT **or**  **CHEMICAL** | **PROCESS(ES) WHERE USED** | **ANNUAL TOXICS USE** | | **Where product/chemical is released to the environment, specify receiving media using codes listed below.\*** |
| **2020**  **(pounds)** | **2019**  **(pounds)** |
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| 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, orgeneration 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).

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| 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.** |
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| **Total Reduction Attributable to Toxic Use Reduction Measures** | | | **0** |  |

**Reduction Measure Codes:**

**PC** - Process Change **OM** - Improved Operations/Maintenance **IR** - In-Process Recycling

**PM** - Product Modification **SP** - Spill/Leak Prevention **PE** - Process Elimination

**IS** - Input Substitution **IC** - Improved Inventory Control **EU** - Equipment Upgrade

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| 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 = 120,000 120,000 =* ***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. | | |
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| 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](mailto:michael.nucci@vermont.gov), **or**  **Cindy Grimes** at (802)-522-0307[cindy.grimes@vermont.gov](mailto:cindy.grimes@vermont.gov). | | |