



## Toxic Use and Hazardous Waste Reduction (TUHWR) Annual Progress Report and Fee Payment

### Submitting Annual Progress Reports

TUHWR Planners are required to submit reports electronically by March 31 of the year *following* the reporting year. For example, reports for year 2024 are due March 31, 2025. To submit a completed report (this fillable PDF or scanned hard copy) via email, or if you have questions about reporting, please contact:

**Drew Youngs**

(802) 461-5929

[andrew.youngs@vermont.gov](mailto:andrew.youngs@vermont.gov)

### Paying Annual Fees

TUHWR Planners are required to pay fees through ANR Online by March 31 of each year. Planners that cannot comply with the online payment requirement may request a waiver in order to mail a paper check. Waivers will only be issued to payers that meet at least one of the following circumstances: issues related to equipment or software, connectivity, limited digital or technological proficiency, lack of credit card or bank account. Paper checks submitted without an approved DEC waiver will be returned. If you have questions about making online payments, or if you need to request a waiver, please contact:

**Wendy Edwards**

(802) 522-0261

[wendy.edwards@vermont.gov](mailto:wendy.edwards@vermont.gov)

#### **Due March 31, annually**

- **Submit reports:** [andrew.youngs@vermont.gov](mailto:andrew.youngs@vermont.gov)
- **Make payments:** <https://anronline.vermont.gov/app/#/formversion/55295f7e-bed1-48ab-96b0-bdb3bb09c1e2>

### Background

Any business that is a Class A or Class B generator of hazardous waste and/or a Large User of toxic substances (see "Definitions" section, below) must develop a TUHWR Plan. Plans must be submitted every three years. Annual Progress Reports and Fees must also be submitted. The next three-year cycle begins when the next TUHWR Plan is due on July 1, 2026.

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 current TUHWR Plan. It is used to assess overall change from year to year in waste generation or chemical use by Vermont businesses. Note that in completing the Annual Progress Report, it will be helpful to have last year's Report on hand.

### 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 2,200 pounds of hazardous waste in one calendar month and generates more than 2,640 pounds of hazardous waste in one calendar year.\*

*\* For purposes of TUHWR 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 Standard Industrial Classification (SIC) Code 20-39, *and* that:

- (a) manufactures, processes, or otherwise uses more than 10,000 lbs./year of a toxic substance; or
- (b) more than 1,000 lbs./year 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://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals> and selecting the “**TRI Chemical List**” for the current reporting year.

### **Fee Calculation**

**Class A Generators** pay \$400 per hazardous waste stream, up to a *maximum* of \$2,000.\*

If two (or more) hazardous waste streams share *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 both coded VT02, D001. The applicable fee is \$400 total for the two waste streams, because the waste codes are identical. 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.

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

*\*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** pay \$400 per toxic substance up to a *maximum* \$2,000.

**Class A Generators that are also Large Users of Toxic Substances** pay \$400 per hazardous waste stream (see “*Class A Generators*” above) plus \$400 per toxic substance, up to a *maximum* of \$4,000.

**Class B Generators that are also Large Users of Toxic Substances** pay a \$400 flat fee for hazardous waste plus \$400 per toxic substance, up to a *maximum* of \$1,200.

### **Contact**

If you are unsure whether your business is subject to TUHWR requirements, or if you have questions about this form, please contact:

**Drew Youngs**

**(802) 461-5929**

[andrew.youngs@vermont.gov](mailto:andrew.youngs@vermont.gov)



# Toxic Use and Hazardous Waste Reduction (TUHWR) Annual Progress Report

## I. Facility Information & Certification

*Note: If you need more than one line to enter your information (e.g., facility mailing address should include street, municipality, and zip code) use the "ENTER" key to add a line to the shaded box.*

Facility Name:

Facility Mailing Address:

Facility EPA ID:

Contact Person:

Telephone Number:

E-mail Address:

Planning Status for Report Year:

- 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 the previous reporting year and you would like to request an exemption, complete this report (indicate "exempt" above) but do not submit the annual fee. You will be contacted to provide additional information supporting your request.*

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 during the reporting year (even if a waste stream was eliminated or represented less than 5% of the annual total). Also include any “new” waste streams generated during the reporting year 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	REPORTING YEAR (2024)		PREVIOUS YEAR (2023)	
			pounds	percent	pounds	percent
<b>Total of Hazardous Waste Generated</b>						

### III. Annual Hazardous Waste Reduction Progress

*This information only needs to be provided by Class A and Class B generators.*

The purpose of this section is to report progress made by Class A and Class B generators in reducing hazardous waste generation during the reporting year relative to the previous year. Generators should only report reductions that are attributable to the implementation of some reduction measure(s), 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 due to 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 2023 to 2024	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"/>
<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, either by the Product Approach or by the Chemical Approach.

**Product Approach** - If the product approach is used, use the table below to list the products that were used in a manufacturing process that meet any of the following criteria:

- 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; or
  - (c) contain between 10 and 24% toxic substances and more than 10,000 pounds were used.

Report on all products that were subject to planning in the previous reporting year, even if use of those products fell below planning thresholds for the reporting year. 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 both of the years shown, and to what media the product was released.

**Chemical Approach** - If the chemical approach is used, use the table below to list any toxic substances where:

- (a) more than 10,000 pounds were used during the current year; or
- (b) more than 1,000 pounds were used in the current year and that amount exceeded 10% of all the toxic substances used at the facility for the year.

Users should report on all chemicals that were subject to planning in the previous reporting year, even if use fell below planning thresholds for the reporting year. 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.

**TABLE BEGINS ON NEXT PAGE**

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.*
		REPORTING YEAR (2024) (pounds)	PREVIOUS YEAR (2023) (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

*This information is only required to be provided by manufacturers that are "Large Users" of toxic substances (see definitions).*

The purpose of this section is to report progress made by Large Users in reducing the use of toxic substances during the reporting year relative to the previous year. Large users should only report reductions that are attributable to the implementation of some reduction measure(s), 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 due to 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 2023 to 2024	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"/>
<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 Level

Toxic Use and Hazardous Waste Reduction progress should be measured relative to changing production/service levels. This is done by comparing units of production/service during the reporting year with units of production/service from the previous year. 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 the current year in the space provided below.

**Example:**     *Current Year (2024) Production/Service Level = 120,000*     **120,000**  
                  *Previous Year (2023) Production/Service Level = 100,000*     **100,000** = **Index of 1.2**

### **Production/Service Factor:**

Current Year Production/Service Level =

Previous Year Production/Service Level =

Index =

Please provide a brief description of any applicable factors present during the reporting 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:

Personnel are available to assist businesses with the preparation of TUHWR Plans, Annual Progress Reports, and identification and assessment of potential toxic use and/or hazardous waste reduction opportunities.

Please contact:

**Drew Youngs**

(802) 461-5929

[andrew.youngs@vermont.gov](mailto:andrew.youngs@vermont.gov)