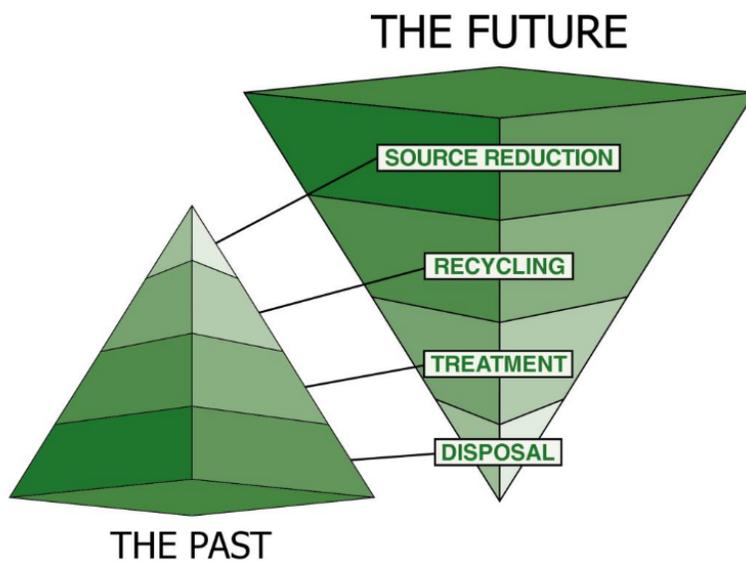


Pollution Prevention Plan 2012 Annual Progress Report

Due Date: March 31, 2013



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, 2011 through July 1, 2014.

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 2012 Annual Progress Report it will be very helpful to have last year's Report available.*

Due Date: The 2012 Annual Progress Report and Fee are **due March 31, 2013**. Checks should be made payable to "Treasurer, State of Vermont".

Please note our new mailing address, and send the report along with the annual fee payment to:

Vermont Department of Environmental Conservation
Waste Management and Prevention Division
1 National Life Dr., Davis 1
Montpelier, Vt, 05620-3704
Attn: Paul Van Hollebeke

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 (i) routinely generated and (ii) comprise at least 5% of the total weight of all hazardous waste generated at the facility during the year. For example, 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 802-522-0219.

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 can be found in Appendix A of the Pollution Prevention Planning Guidance or by going to: <http://www.epa.gov/tri/trichemicals/index.htm>

Fee Calculation– Please note fees have increased for this 2012 Progress Report

Class A Generators, \$350 per hazardous waste code up to a *maximum of \$1,750*.

For example, if two (or more) hazardous waste streams share the *identical* waste code(s), they are assessed as a single waste stream for fee purposes. To elaborate, assume a facility has two (or more) waste streams from separate processes that are coded VT02, D001. The applicable fee is \$350 because the identical codes are used. However, if one of the waste streams is coded VT02 and the other is VT02, D001, the applicable fee is \$700 because the codes are not identical.

Class B Generators, a flat fee of \$350, 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. For example, wastes generated due to cleanup of a rare spill incident are considered non-routine and are not subject to fees. If you are unsure as to whether a particular waste stream is subject to planning and fees, please call 802-522-0219.

Large Users of Toxic Substances, \$350 per toxic substance up to a *maximum \$1,750*.

Class A Generators that are also Large Users of Toxic Substances, \$350 per hazardous waste code (see discussion under *Class A Generators* above) plus \$350 per toxic substance up to a *maximum of \$3,500*.

Class B Generators that are also Large Users of Toxic Substances, \$350 per hazardous waste code (see discussion under *Class A Generators* above) plus \$350 per toxic substance up to a *maximum of \$1050*.

Questions: If you have questions about this Progress Report, please contact Paul Van Hollebeke at **1-802-522-0219**. The form is also available in Microsoft Word or PDF format. The files can be downloaded from EAO's web site at: <http://www.eaovt.org/ppap/p2forms.htm> or you can receive the files via e-mail by sending a request to: paul.vanhollebeke@state.vt.us.

**2012
Pollution Prevention Plan
Annual Progress Report**

I Facility Information and Certification

Facility Name: _____

Facility Mailing Address: _____

Contact Person: _____

Telephone: _____

E-mail Address (if available): _____

Current Year Planning Status: Class A Class A & Large User

** If your facility did not exceed
planning thresholds for hazardous
waste generation or toxic substance
use in 2012 and you would like to
request an exemption, complete this
report but do not submit the annual
fee.*

Class B Class B & Large User

Large User Exempt *

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 2011 (even if a particular waste stream was eliminated or represented less than 5% of the annual total in 2012). Include any "new" waste streams generated in 2012 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.

WASTE STREAM			ANNUAL QUANTITY GENERATED			
EPA OR VT WASTE CODE(S)	Name of Hazardous Waste Stream	Process Generating Waste Stream	2012		2011	
			pounds	percent	pounds	percent
Sum 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 2012 relative to 2011. 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 2011 to 2012	Was This Reduction Opportunity Identified on Worksheet 10 of your P2 Plan? Y or N
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 2011 even if use of those products fell below planning thresholds in 2012.

- 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 2012 OR (b) more than 1,000 pounds were used in 2012 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 2011 even if use of those chemicals fell below planning thresholds in 2012.

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.*
		2012 (pounds)	2011 (pounds)	
Sum of Toxic Substances Used				

* 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 2012 relative to 2011. 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 2011 to 2012	Was This Reduction Opportunity Identified on Worksheet 10 of your P2 Plan? Y or N
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 2012 with units of production/service for 2011. 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 2012 in the space provided below.

Example: 2012 Production/Service level 120,000 units
 2011 Production/Service Level 100,000 units = **Index of 1.2**

2012 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 802-522-0219 if we can help.
