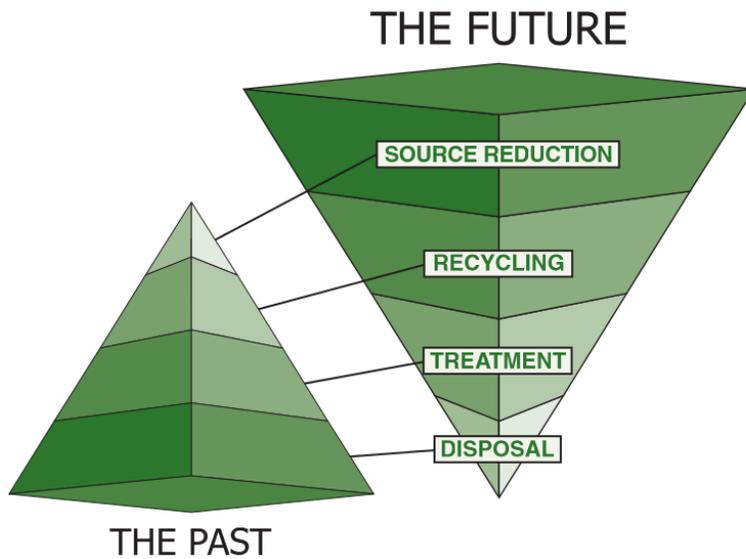


POLLUTION PREVENTION PLANNING

Guidance & Worksheets

Revised July, 2011



 VERMONT
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
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Introduction and Purpose

This is Vermont's Guidance for Pollution Prevention (P2) Planning (also referred to as Toxics Use and Hazardous Waste Reduction Planning) **for plans due July 1, 2011**. For most companies, this will be an update of your current P2 Plan. The requirement for companies that generate hazardous waste and/or use toxic substances in their operations to develop a pollution prevention plan is found in 10 V.S.A. Chapter 159 Sections 6623-6632, passed by the Vermont Legislature in 1991. The complete text of that law can be found on our Environmental Assistance Office web-site:

<http://www.eaovt.org/ppap/act100.htm>

This Guidance has been designed to walk you through the preparation of your plan, step by step, providing worksheets for your calculations and reporting. **Once you have completed Worksheets 1 - 10 you will have developed an approvable Plan for your facility.** The Worksheets are also available in Microsoft Word and may be accessed via our web site at:

<http://www.eaovt.org/ppap/p2forms.htm>

The Environmental Assistance Office is located in the Vermont Department of Environmental Conservation (DEC). EAO is the only non-regulatory office within the Department. In addition to administration of the plan requirement, staff provide planning assistance to companies, including information on toxics use and hazardous waste reduction strategies. Please call us with any questions at (802) 241-3629, or in Vermont, use our toll-free hotline, 1-800-974-9559.

The P2 planning process assigns priority to source reduction strategies - eliminating or minimizing waste generation or chemical use. Once waste has been generated, recycling strategies receive priority over treatment, since there is typically no re-use associated with waste treatment strategies. Successful implementation of P2 initiatives can have many benefits. Economic benefits may include more efficient use of raw materials, minimizing fees associated with the use of hazardous materials, avoiding costs associated with regulatory compliance by falling below regulatory thresholds, and lower costs associated with the management and disposal of hazardous waste.

Planning is intended to be an ongoing process and plans are meant to be dynamic documents. Periodic assessment of opportunities is expected and necessary in response to the ever-changing business landscape. Any Performance Goals established on Worksheet 10 of the plan can be readjusted as necessary during the three-year plan period.

IMPORTANT DEFINITIONS

Toxics Use Reduction is any change or modification that avoids, reduces, or eliminates the use of toxic substances that result in the generation of hazardous wastes, without transferring toxic pollutants to another medium, such as the air or water. Strategies might include: employee training to prevent waste of materials, equipment upgrades, chemical substitution and working with vendors to investigate new, less toxic products.

Hazardous Waste Reduction is any recycling or other activity applied after hazardous waste is generated to reduce the volume, quantity, toxicity or all three. It does not include activities that transfer hazardous constituents from one medium to another (ie. solid waste to air or wastewater). It also does not include incineration or using dilution as a means of reducing toxicity. It may include on-site or off-site treatment where it can be shown that such treatment confers a higher level of protection to public health, safety and the environment than other technically and economically practicable waste reduction alternatives.

Who is Required to Plan?

All companies that are either Class A or Class B generators of hazardous waste, or that are Large Users of toxic substances, must prepare a Pollution Prevention Plan.

A Class A Generator is a company that generates 2,200 lbs. or more of hazardous waste in any one month of the calendar year.

A Class B Generator is a company that generates 2,640 lbs. or more of hazardous waste per year (220 lbs./month).

A Large User is a facility with ten or more full-time employees that is in Standard Industrial Classification (SIC) Code 20-39 and that manufactures, processes or otherwise uses:

- (i) more than 10,000 lbs./yr of a toxic substance; **or**
- (ii) more than 1,000 lbs./yr of a toxic substance 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.

A toxic substance is any chemical or chemical compound found on the list in Appendix A of this guidance. This is the same list of chemicals listed pursuant to Title III, Section 313 of SARA (Superfund Amendments and Reauthorization Act of 1986).

Planning Requirements

The Plan. A pollution prevention plan must be developed every three years. The current planning cycle extends from July 1, 2011 through July 1, 2014. Plans are **not** a public record and therefore not available to the public upon request. **Completed plans do not have to be submitted but all plans must be reviewed by EAO staff.** Companies are encouraged to submit the completed plan for review.

Companies may choose to use their own format in lieu of the Worksheets contained in this guidance to prepare a Plan, so long as all of the required information is included. Also, in lieu of a Plan, a company may opt to use the **Environmental Management System (EMS) Alternative.** Several Vermont companies have met their pollution prevention planning requirement by adopting a comprehensive Environmental Management System as part of their overall business strategy. The EMS must address pollution prevention as well as environmental compliance. Refer to **Appendix B** for details about using the EMS alternative.

Plan Summary. Where a company chooses not to submit the complete plan, the Plan Summary must be submitted to EAO. The Plan Summary is comprised of **Worksheets 1, 2 and 10 and the signed Certification of Plan Completion.** The Certification of Plan Completion form must be signed by a company official and is found on the next page of this guidance. EAO staff will call to schedule a time to review the complete Plan at the facility at a later date.

Plan Review. The Environmental Assistance Office will review all P2 plans. If a plan is determined to be deficient, the company will be given between 90 and 180 days to correct the deficiencies. Staff will be available to assist the company in such situations. The goal of the review process is to produce an approved plan, not to penalize non-compliance.

Annual Progress Reports. Facilities must also prepare and submit an Annual Report on progress made in achieving reduction goals established in the Plan. Progress report forms are due March 31 of each year for the previous year's toxics use and hazardous waste reduction information. Reporting forms are mailed to planners around March 1st. Information contained in annual reports is a public record and may be assembled to provide information for the Vermont Legislature and others on pollution prevention.

Fees. There is no fee requirement associated with developing the P2 Plan. Fees are payable, however, every March 31 with submission of Annual Progress Reports.

NEED PLANNING ASSISTANCE? GIVE US A CALL AND PUT OUR RESOURCES AND EXPERIENCE TO WORK FOR YOUR BUSINESS.

1-800-974-9559

POLLUTION PREVENTION PLAN

CERTIFICATION OF COMPLETION

(To be submitted with Worksheets 1, 2, and 10, as the Plan Summary, where decision is made not to submit the complete Plan.)

This document certifies that a complete Pollution Prevention Plan has been developed in accordance with this Planning Guidance (July, 2011) and that the information provided herein is true, correct and complete. I understand that this facility's Pollution Prevention Plan must be available for on-site review by staff of the Environmental Assistance Office.

Signature: _____

Print Name: _____

Title: _____

Date: _____

