

# **POLLUTION PREVENTION WASTE MANAGEMENT WORKSHOP**

**Save money – Reduce risk – Eliminate waste**

**Pollution Prevention Waste Management Workshop**  
September 20, 2023

## **Pollution Prevention Planning Law**

Shelby Williams  
P2 Coordinator  
TCEQ



# Pollution Prevention Planning Law



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# Topics

- Pollution Prevention (P2)
  - Program Background
  - P2 Requirements
  - Success Stories



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# P2 Background

- 1990 Federal Pollution Prevention Act
- 1991 Texas Senate Bill 1099 = Waste Reduction Policy Act (WRPA)
- Title 30 TAC Chapter 335, Subchapter Q (§335.471-480)



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# WRPA Created

- Government in cooperation with:
  - Industry representatives
  - Public Interest Groups
  - Educational Organizations



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

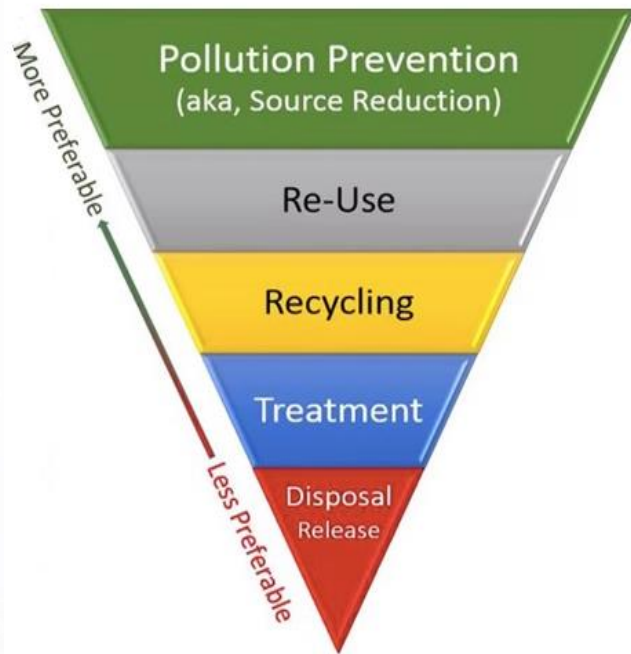
# WRPA Created

Together they created a pollution prevention program that has a positive impact on industry as well as the environment.



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# Waste Hierarchy



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# Source Reduction

30 TAC §335.471(13)

- Occurs **before** a waste has been “generated” or created
- Prior to reuse or recycling
- Examples
  - Equipment modifications
  - Product redesign or reformulations



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste



# Waste Minimization

30 TAC §335.471(16)

- Occurs **after** a waste has been “generated” or created
- Examples included
  - Reuse
  - Recycle
  - Detoxification
  - Neutralization



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# How P2 Works

- Sites go through the process to:
  - Identify wastes
  - Identify options
  - Evaluate economics
- Five-year P2 Plan and Executive Summary



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# Why It Works

- Reducing waste:

1. Saves money
2. Reduces regulatory burden
3. Improves worker safety
4. Increases productivity
5. Conserves resources
6. Protects environment
7. Enhances public image



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# Success Story

- Chemical Blending facility
  - Completed a waste evaluation and determined one product line created most of the hazardous waste.
  - Changed this product to an “On Demand” for the client
  - No longer storing MEK unless the demand is there.

***18K Tons Reduced in one year!***



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# Reduce Regulation

## Hazardous waste generation. . . .

- LQG ( $> 2,200$  lbs/month) = 88 requirements
- SQG (220 to 2,200 lbs/month) = 74
- **CESQG/VSQG ( $\leq 220$  lbs/month) = ONLY 4**



# WRPA Rules



Who does it  
apply to?



Who does it  
**NOT** apply to?



What is  
required?



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# WRPA Does Apply To

- All Toxic Release Inventory (TRI) Form R reporters
- Hazardous Waste Generators:
  - Large Quantity Generators
    - More than 2,200 lbs of HW/month; or
    - More than 2.2 lbs of acute HW/month
  - Small Quantity Generators
    - 220 lbs - 2,200 lbs of HW/month;
    - Up to 2.2 lbs of acute HW/month



... and does **NOT** apply to:

- TRI Form A reporters who are not LQG or SQG
- Conditionally Exempt Small Quantity Generators (CESQG) who **DO NOT** report TRI Form R
- Sites regulated only by the Railroad Commission



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste



# WRPA Exemptions

- Sites only reporting because of remediation
  - Granted on an annual case-by-case basis
  - Must renew annually
  - Generally, for 1-time remediation projects



# WRPA Requirements

## 1. Prepare 5-year Pollution Prevention (P2) Plan:

- Renew every 5 years
  - Always due on January 1st
- Keep available on site
  - Let more than one person know where to find it



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# WRPA Requirements

## 2. Submit **Executive Summary** of P2 Plan to TCEQ


- With Certificate of Completeness and Correctness (**C3**)
- **Signed** by site owner, plant manager, corporate officer
- Due when you create, renew, or update your P2 Plan
- Keep proof of submittal with your P2 Plan



# WRPA Requirements

## 3. Submit Annual Progress Reports (APRs)

- LQGs and TRI Form R reporters ONLY


 Texas Commission on Environmental Quality  
**P2 Annual Progress Report**
Required APR Form

**PART 1. FACILITY DESCRIPTION**

Report Year: _____		Report Date: _____	
Company Name: _____			
Facility Name: _____			
Mailing Address: _____		Physical Address: _____	
Mailing City, State, Zip: _____		Physical City, State, Zip: _____	
Name of Pollution Prevention Contact: _____		TCEQ SW Reg. #: _____	
Telephone: _____ Ext: _____		TRI ID #: _____	
Fax: _____		EPA ID #: _____	
Email (optional): _____		P2 Program ID (if number): _____	
Primary SIC Code: _____		Number of Employees: _____	
Primary NAICS: _____		Registered Entity Number (REN): _____	
First year of your current plan: _____		Customer Number (CN): _____	

Does this report revise a previously submitted APR?  Yes  No

**PART 2. PROJECTED AMOUNTS FOR GOAL YEAR (FROM YOUR PLAN)**

Goal Year (the 8th year of your plan): \_\_\_\_\_

	Estimate Quantity	
	HW (A) (Tons)	TRI (B) (Tons)
1. Projected amount of HW generation or TRI releases/transfers by Goal Year	Tons	Tons
2. Source reduction anticipated over 8th-year period	Tons	Tons
3. % Waste Minimization by the Goal Year	%	%

TCEQ-00784 (711)

Facility Name: \_\_\_\_\_ Date: \_\_\_\_\_ Page 2 of 2

**Part 3. Reduction Achievement for the Report Year**

**Source Reduction Activities**  
 Estimate the amount of reduction for hazardous waste generation and TRI release/transfer that your facility experienced in each category below.

	Estimate Quantity	
	HW (A) (Tons)	TRI (B) (Tons)
1. Good Operating Practices		
2. Inventory Control		
3. Spill and Leak Prevention		
4. Raw Material Modifications		
5. Process Modifications		
6. Cleaning and Degreasing		
7. Surface Preparation and Finishing		
8. Product Modification		
<b>9. Total Source Reduction (Sum 1-8) in Tons</b>		

Briefly describe any modifications to your plan as well as your pollution prevention projects, especially the activity you undertook to reduce waste at its source for the report year:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Note: Submission of waste minimization information and information about HW generated and TRI released and transferred for the previous reporting year is required by the Waste Reduction Policy Act (WRPA) that amends Title Form R requires meet this requirement through submission of their annual waste summary. All hazardous waste generators are required to submit an annual waste summary. Submission of this form does not substitute for submission of the annual waste summary.

TCEQ-00784 (711)



# Annual Progress Report

- Due July 1 and covers previous calendar year
  - Submit online through STEERS
    - From May 15 - July 1
  - or-
  - Submit “hard” copy
    - Email: [p2@tceq.texas.gov](mailto:p2@tceq.texas.gov)
    - Mail: TCEQ Pollution Prevention  
MC - 118  
P.O. Box 13087  
Austin, TX 78711-3087



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# SQG/Non-TRI R

- If Small Quantity Generator & not TRI Form R:
  - No Annual Progress Report
  - Not required in P2 Plan
    - Employee awareness training (but a good idea)
    - Media transfer discussion



# New-Comers

- Site that becomes subject to WRPA has **90 days** to put a P2 Plan in place:
  - First time TRI reporters
- First Annual Waste Summary showing SQG or LQG
- ❖ Keep a copy on-site and send a signed Executive Summary to TCEQ



# Enforcement

- Violations of 30 TAC Chapter 335 Subchapter Q:
  - Failure to have complete P2 Plan available on site
  - Failure to submit Executive Summary of P2 plan
  - Failure to keep the Executive Summary updated
  - Failure to submit Annual Progress Report



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste



# Why Comply?



Economic benefits



Reduced regulatory burden



Protect the environment



Public relations



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# WRPA Results

Reductions since 1999\*:

- Over **22 million tons** of Hazardous Waste
- Over **6 million tons** of TRI Chemicals

\*Results taken from the Annual Progress Reports from 1999-2022



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# P2 Program Contacts

- **TCEQ Pollution Prevention & Education**
  - Phone: 512-239-0010
  - Email: [P2@tceq.texas.gov](mailto:P2@tceq.texas.gov)
  - Website: [www.P2plan.org](http://www.P2plan.org)
- **Shelby Williams, P2 Coordinator**
  - Phone: 512-239-4968
  - Email: [shelby.williams@tceq.texas.gov](mailto:shelby.williams@tceq.texas.gov)
- **Juliana Sampson, P2/RENEW**
  - Phone: 512-239-2619
  - Email: [juliana.sampson@tceq.texas.gov](mailto:juliana.sampson@tceq.texas.gov)



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste

# Questions



**POLLUTION PREVENTION  
WASTE MANAGEMENT WORKSHOP**  
Save money – Reduce risk – Eliminate waste