

POLLUTION PREVENTION WASTE MANAGEMENT WORKSHOP

Save money – Reduce risk – Eliminate waste

Pollution Prevention Waste Management Workshop

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Pollution Prevention Planning Law

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TCEQ



Pollution Prevention Planning Law



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Topics

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



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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)



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WRPA Created

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



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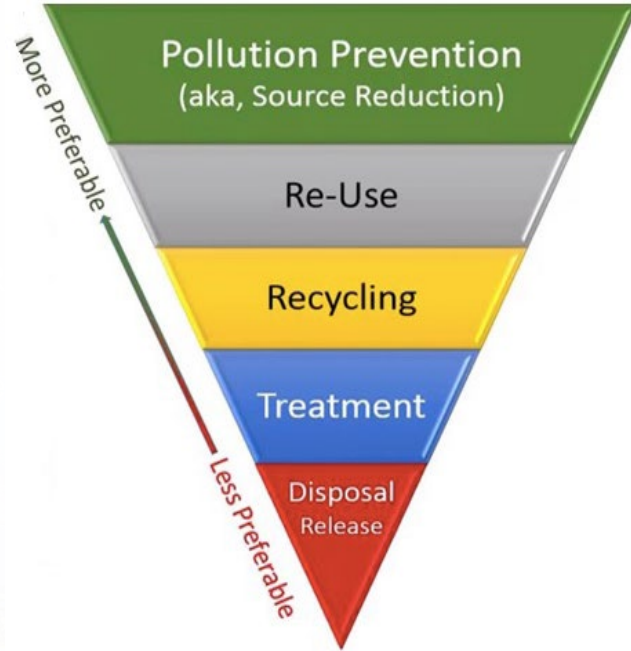
WRPA Created

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



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Waste Hierarchy



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Source Reduction

30 TAC §335.471(8)

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



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Waste Minimization

30 TAC §335.471(11)

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



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How P2 Works

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



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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



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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!



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Reduce Regulation

Hazardous waste generation. . . .

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



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WRPA Rules



Who does it
apply to?



Who does it
NOT apply to?



What is
required?



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WRPA Does Apply To

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



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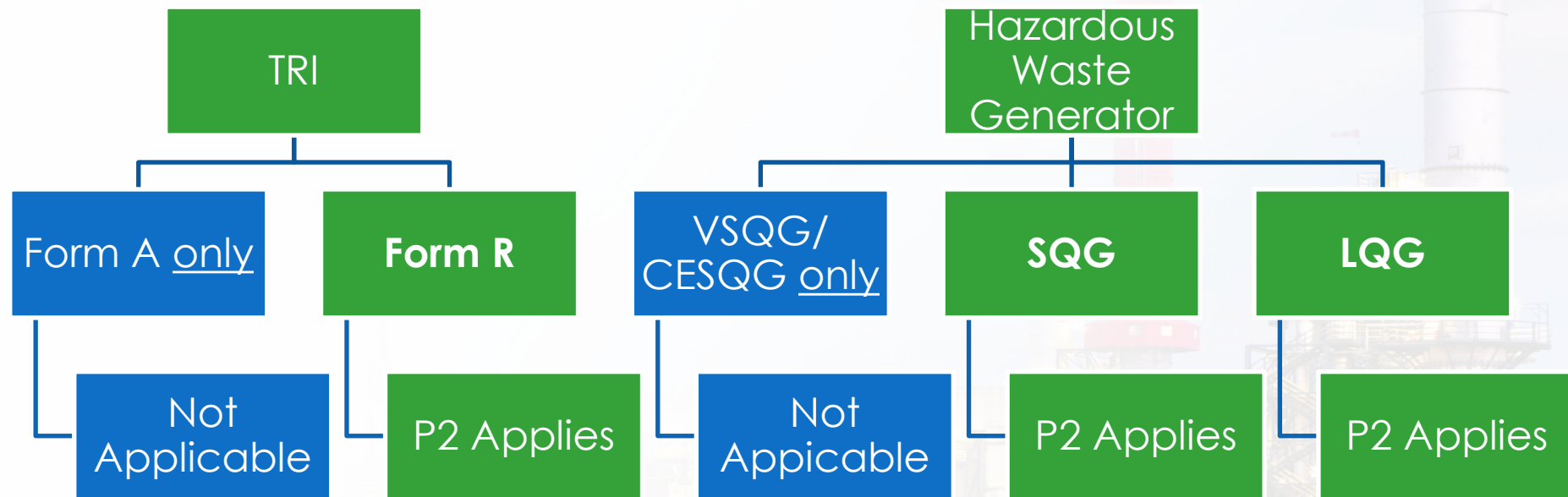
... and does **NOT** apply to:

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



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Applicability Chart



WRPA Exemptions

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



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WRPA Requirements

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

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



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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




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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. No.:
Telephone: Ext.:	TRI ID No.:
Fax: :	EPA ID No.:
Email (optional):	P2 Program ID No. (if blank):
Primary SIC Code:	Number of Employees:
Primary NAICS:	Regulated Entity No. (REN):
First year of your current plan:	Customer No. (CIN):
Does this report revise a previously submitted APR? <input type="checkbox"/> Yes <input type="checkbox"/> No	

PART 2. PROJECTED AMOUNTS FOR GOAL YEAR (FROM YOUR PLAN)
Goal Year (the 5th year of your plan): _____

	Estimate Quantity	
	HW (Column A)	TRR (Column B)
1. Projected amount of HW generation or TRI releases/transfers by Goal Year	Tons	Tons
2. Source reduction anticipated over five-year period	Tons	Tons
3. % Waste <u>reduction</u> by the Goal Year	%	%

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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)	TRR (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		
9. Total Source Reduction (Sum 1-8) in Tons		

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 Hazardous Waste Policy Act (RCRA) and non-TRI Form R reporters must also report 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.

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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
 - Mail: TCEQ Pollution Prevention
MC - 118
P.O. Box 13087
Austin, TX 78711-3087



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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



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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



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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



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Why Comply?



Economic benefits



Reduced regulatory burden



Protect the environment



Public relations



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WRPA Results

Reductions since 1999*:

- Over **22 million tons** of Hazardous Waste
- Over **7 million tons** of TRI Chemicals

*Results taken from the Annual Progress Reports from 1999-2024



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P2 Program Contacts

- **TCEQ Pollution Prevention & Education**
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 - Email: P2@tceq.texas.gov
 - Website: www.P2plan.org
- **Shelby Williams, P2 Coordinator**
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Questions



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