

Pollution Prevention (P2) Analysis and Plan for

(Company Name)

ADEQ P2 ID Number:

This document is an:

Original Plan

Amendment to the Original Plan

The Plan Time Frame (Section 5) is:

From: _____ **(beginning date)**

To: _____ **(the last goal completion date)**

Mail completed P2 Plan to:

Arizona Department of Environmental Quality
Sustainability Programs Unit
Pollution Prevention Program
1110 W. Washington St.
Phoenix, Arizona 85007

Section 1. General Information A.R.S. §49-963.J.1 and J.2)

Requirement: Provide the name and location of the principle business activities at the facility, and the name address and telephone number of the owner or operator of the facility and of the senior official with management responsibility at the facility.

Name of Company: _____

Owner or Operator Name and Telephone Number: _____

Mailing Address: _____

Description of what this business does (principal business activities): _____

P2 Technical Contact Information:

Contact Person: _____

Telephone Number: _____

Fax Number: _____

E-mail Address: _____

One P2 Plan may be submitted to cover more than one facility. Please ensure that Section 3 is completed for each facility covered by this Plan.

How many facilities will be covered by this Plan? _____

Section 2. Certification (A.R.S. §49-963.J.2 and 3)

I certify that I have personally read this Pollution Prevention Plan. I am familiar with its contents and attachments. Based on my inquiry of the persons immediately responsible for obtaining the information contained in the Plan, I believe, to the best of my knowledge, the information presented in the Plan is true, accurate and complete.

Certifying signature

Title

Date

For the person signing and certifying the plan: (This person must be a senior official with management responsibility at the facility.)

Print Name (Please print or type): _____

Print Title: _____

Telephone Number: _____

Fax Number: _____

E-mail address: _____

Section 3. Facility Information (A.R.S. §49-963-J.1; §49-963-I)
--

Facility Name: _____

Physical Address: _____

Primary NAICS Code (6 digits): _____ **Other NAICS Codes** (optional): _____

Permits

(Please list below any permits at this facility. Write "NONE" for any permits that do not apply.)

RCRA ID Number (also known as EPA ID Number): _____

(For example AZD123456789)

NPDES Permits: _____

Air Quality Permits: _____

Water Quality Permits: _____

List any other environmental permits: _____

Plan Requirement Threshold(s) Met

(Please check all P2 plan filing threshold(s) the facility met which requires the facility to file and maintain a P2 Plan.

- Generated or shipped offsite for purposes other than recycling an average of one thousand kilograms per month of hazardous waste in calendar year 20_____. *The cumulative amount and streams of hazardous waste generated at the facility includes all of the following waste streams:* _____
- Generated or shipped offsite for purposes other than recycling an average of one kilogram per month of acutely hazardous waste in calendar year 20_____. *The cumulative amount and streams of acutely hazardous waste generated at the facility includes all of the following waste streams:* _____
- Met the thresholds required to file a Toxic Release Inventory (TRI) form (form R or A) for the calendar year 20_____. The TRI identification number assigned to this facility is _____. *The TRI chemicals that met the thresholds are:* _____
- Used in excess of 10,000 pounds of a toxic substance in calendar year 20_____. *The toxic substances used above the 10,000-pound threshold are:*

- Facility wants to file a voluntary P2 plan although it does not meet the P2 plan filing thresholds.

Section 4. Management and Corporate Support (A.R.S. §49-963.J.5 and J.9)

Requirement: Provide a written policy setting forth management and corporate support for the P2 Plan and a commitment to implement the Plan to achieve the Plan goals. The Plan shall include employee awareness and training programs to involve employees in P2 planning and implementation to the maximum extent feasible.

P2 POLICY

Check box 1 or 2 below.

1. The senior official with management responsibility at the facility has signed, and we have posted in our facility, a copy of the P2 Policy contained in the ADEQ P2 guidance manual. A copy of the signed policy is provided on the next page of this plan.

OR

2. The senior official with management responsibility at the facility, has signed, and we have posted in our facility, a copy of our own P2 Policy setting forth management and corporate support for the P2 plan and a commitment to implement the Plan to achieve the Plan goals. A copy of the signed policy is provided on the next page of this Plan.

Check each box that applies and complete information below that applies.

3. The policy will be displayed in view of all employees and introduced to new employees
The policy is posted at the following location(s): _____
4. The policy will be available in languages other than English, as appropriate, and to the public and customers (as appropriate).

Pollution Prevention (P2) Policy

Name: _____

Our company is committed to protecting the health and safety of the public, our employees and protecting the environment.

To the best of our ability we will:

- Develop a P2 Plan and implement the Plan to achieve the Plan goals.
- Provide employee awareness and training programs to involve employees in P2 planning and implementation to the maximum extent feasible.
- Incorporate the P2 Plan into management practices and procedures.
- Use P2 to reduce or eliminate the toxicity and the amount of toxic substances and hazardous wastes and minimize their undesirable effects on air, water and land resources, and to conserve resources, including energy and water.
- Comply with the relevant laws and regulations and implement programs and procedures to assure environmental compliance.

Our management and employees are committed to continual improvement and will continuously seek opportunities to improve the effectiveness of our environmental program.

Signature

Title

Date

Section 5. Scope and Objectives (A.R.S. §49-963.K; A.R.S. §49-963.J.6)

Requirement: The time frame of the original Plan must span at least 2 years at a minimum. Provide a statement of the plan's scope and objectives.

Plan Time Frame: The current time frame of this Plan or Amendment will be:

FROM: _____ **TO: THE LAST GOAL COMPLETION DATE** _____
(month/day/year) (month/day/year)

**Note: Plan time frame must be the same as the date defined on the cover page.*

PLAN SCOPE

The Plan scope should contain, at a minimum, a list of all process areas to be analyzed in the Section 6 process review, and include toxic substances and hazardous wastes for which the facility must file this Plan. This scope should be as specific as possible, as an example, you may use a facility wide process area such as "Spill and Leak Prevention" or a process area such as a "Spray Booth Operations." Note each process area listed here must have a corresponding "Analysis and Opportunity Development" completed for Section 6.

Staff will look at the following process areas for this Plan:

1. _____
2. _____
3. _____
4. _____
5. _____

ENVIRONMENTAL OBJECTIVES

The general objectives for this scope were developed and include the following:
(Check all that apply)

- Improved operating practices to improve housekeeping, or spill and leak prevention.
- Improved management practices, such as purchase and inventory control.
- Process or equipment modifications to minimize the use of toxic substances.
- Process or equipment modifications to minimize the generation of hazardous waste.
- Process or equipment modifications to minimize the generation of HAP or VOC or other particulate emission reductions.
- Raw material modifications or substitutions to minimize the "use" of toxic substances.
- Resource conservation (water, energy, etc).
- Reuse or recycling of materials or wastes.
- Reduction in use or emissions of greenhouse gasses or ozone producing chemicals
- Other: _____

Section 6. Analysis and Opportunity Identification (A.R.S. §49-963.J.7)

Requirement: Provide an analysis identifying pollution prevention opportunities to reduce or eliminate toxic substance releases and hazardous waste generation.

Answer the following questions that apply to your operation, activity or process. Only current processes should be discussed in Section 6. Completed or historic pollution prevention projects, activities or accomplishments should be discussed in Section 10. **Note: Even if you believe your facility has no feasible opportunities for reducing hazardous waste generation or toxic usage, you must discuss that here in Section 6.**

Process Review

1. Process Area (# _____):

2. Process Information

The analysis information should be a narrative. The information may come from your "input-output" diagram or "input-output" table, from your root cause analysis results summary, or from other process analysis tools or methods. Those tools are commonly used to help visualize and develop the root cause of emissions toxic substance use and waste.

To assure that you have provided complete P2 analysis process information, check the corresponding boxes below as you answer that question in your review. These boxes provide a confirmation that the information was included in the Plan. **Please use additional sheets if the process details cannot fit in the spaces provided below.**

- a. Describe the process steps. _____

- b. Discuss the toxic substances (inputs) used in the process and why they are used. _____

- c. Discuss the wastes and emissions (output) generated by the process. Include wastes and emissions due to spills, cleaning, maintenance, unused or expired raw materials, etc, and include waste codes. _____

- d. Describe what happens to each waste and emission. (Is it disposed, segregated recycled, treated, incinerated, released to air, etc?) _____

- e. Discuss whether raw material purchases produce packaging material that must be handled? (i.e. pallets, drums, bags, etc.) If so, describe what happens to this material? _____

- f. Discuss the root cause of each waste generation, emission or toxic substance use. _____

Section 6. (Continued)-

3. Are there pollution prevention opportunities? *Your P2 analysis involves re-thinking how this process or function may be accomplished in other ways that might prove to be environmentally preferable, while still meeting cost and performance requirements. The waste management hierarchy and the different levels and kinds of pollution prevention techniques (alternatives) should be considered, such as using substitute products, technology changes, improved work practices, etc. Refer to the pollution prevention techniques table in the ADEQ plan guidance document for examples.*

As a result of your P2 analyses, answer the questions below.

Can the process “inputs” or method, etc., be eliminated or modified to reduce waste, emission(s) or toxic substance use?

Yes

No

Can any of the toxic or non-toxic substances be:

Eliminated?

Replaced with a less toxic substitute?

Used less?

Recycled or reused?

Reformulated to reduce toxicity?

None of these

Other _____

4. Based on the results from item 3 above: Describe the pollution prevention opportunities to: eliminate at the source, reduce at the source, reduce toxicity, reduce the volume, reuse or recycle each waste, emission or use of the toxic substance.

Opportunity (A): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (B): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (C): (Describe): _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Write each feasible opportunity onto a goal form found in Section 7. Use one goal form for each feasible opportunity.

Section 6. Analysis and Opportunity Identification (A.R.S. §49-963.J.7)

Requirement: Provide an analysis identifying pollution prevention opportunities to reduce or eliminate toxic substance releases and hazardous waste generation.

Answer the following questions that apply to your operation, activity or process. Only current processes should be discussed in Section 6. Completed or historic pollution prevention projects, activities or accomplishments should be discussed in Section 10. **Note: Even if you believe your facility has no feasible opportunities for reducing hazardous waste generation or toxic usage, you must discuss that here in Section 6.**

Process Review

1. Process Area (# _____):

2. Process Information

The analysis information should be a narrative. The information may come from your "input-output" diagram or "input-output" table, from your root cause analysis results summary, or from other process analysis tools or methods. Those tools are commonly used to help visualize and develop the root cause of emissions toxic substance use and waste.

To assure that you have provided complete P2 analysis process information, check the corresponding boxes below as you answer that question in your review. These boxes provide a confirmation that the information was included in the Plan. **Please use additional sheets if the process details cannot fit in the spaces provided below.**

- a. Describe the process steps. _____

- b. Discuss the toxic substances (inputs) used in the process and why they are used. _____

- c. Discuss the wastes and emissions (output) generated by the process. Include wastes and emissions due to spills, cleaning, maintenance, unused or expired raw materials, etc, and include waste codes. _____

- d. Describe what happens to each waste and emission. (Is it disposed, segregated recycled, treated, incinerated, released to air, etc?) _____

- e. Discuss whether raw material purchases produce packaging material that must be handled (i.e. pallets, drums, bags, etc.) If so, describe what happens to this material. _____

- f. Discuss the root cause of each waste generation, emission or toxic substance use. _____

Section 6. (Continued)-

3. Are there pollution prevention opportunities? *Your P2 analysis involves re-thinking how this process or function may be accomplished in other ways that might prove to be environmentally preferable, while still meeting cost and performance requirements. The waste management hierarchy and the different levels and kinds of pollution prevention techniques (alternatives) should be considered, such as using substitute products, technology changes, improved work practices, etc. Refer to the pollution prevention techniques table elsewhere in this document for examples.*

As a result of your P2 analyses, answer the questions below.

Can the process “inputs” or method, etc., be eliminated or modified to reduce waste, emission(s) or toxic substance use?

Yes

No

Can any of the toxic or non-toxic substances be:

Eliminated?

Replaced with a less toxic substitute?

Used less?

Recycled or reused?

Reformulated to reduce toxicity?

None of these

Other _____

4. Based on the results from item 3 above: Describe the pollution prevention opportunities to: eliminate at the source, reduce at the source, reduce toxicity, reduce the volume, reuse or recycle each waste, emission or use of the toxic substance.

Opportunity (A): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (B): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (C): (Describe): _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Write each feasible opportunity onto a goal form found in Section 7. Use one goal form for each feasible opportunity.

Section 6. Analysis and Opportunity Identification (A.R.S. §49-963.J.7)

Requirement: Provide an analysis identifying pollution prevention opportunities to reduce or eliminate toxic substance releases and hazardous waste generation.

Answer the following questions that apply to your operation, activity or process. Only current processes should be discussed in Section 6. Completed or historic pollution prevention projects, activities or accomplishments should be discussed in Section 10. **Note: Even if you believe your facility has no feasible opportunities for reducing hazardous waste generation or toxic usage, you must discuss that here in Section 6.**

Process Review

1. Process Area (# _____):

2. Process Information

The analysis information should be a narrative. The information may come from your "input-output" diagram or "input-output" table, from your root cause analysis results summary, or from other process analysis tools or methods. Those tools are commonly used to help visualize and develop the root cause of emissions toxic substance use and waste.

To assure that you have provided complete P2 analysis process information, check the corresponding boxes below as you answer that question in your review. These boxes provide a confirmation that the information was included in the Plan. **Please use additional sheets if the process details cannot fit in the spaces provided below.**

- a. Describe the process steps. _____

- b. Discuss the toxic substances (inputs) used in the process and why they are used. _____

- c. Discuss the wastes and emissions (output) generated by the process. Include wastes and emissions due to spills, cleaning, maintenance, unused or expired raw materials, etc, and include waste codes. _____

- d. Describe what happens to each waste and emission. (Is it disposed, segregated recycled, treated, incinerated, released to air, etc?) _____

- e. Discuss whether raw material purchases produce packaging material that must be handled? (i.e. pallets, drums, bags, etc.) If so, describe what happens to this material? _____

- f. Discuss the root cause of each waste generation, emission or toxic substance use. _____

Section 6. (Continued)-

3. Are there pollution prevention opportunities? *Your P2 analysis involves re-thinking how this process or function may be accomplished in other ways that might prove to be environmentally preferable, while still meeting cost and performance requirements. The waste management hierarchy and the different levels and kinds of pollution prevention techniques (alternatives) should be considered, such as using substitute products, technology changes, improved work practices, etc. Refer to the pollution prevention techniques table elsewhere in this document for examples.*

As a result of your P2 analyses, answer the questions below.

Can the process "inputs" or method, etc., be eliminated or modified to reduce waste, emission(s) or toxic substance use?

Yes

No

Can any of the toxic or non-toxic substances be:

Eliminated?

Replaced with a less toxic substitute?

Used less?

Recycled or reused?

Reformulated to reduce toxicity?

None of these

Other _____

4. Based on the results from item 3 above: Describe the pollution prevention opportunities to: eliminate at the source, reduce at the source, reduce toxicity, reduce the volume, reuse or recycle each waste, emission or use of the toxic substance.

Opportunity (A): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (B): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (C): (Describe): _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Write each feasible opportunity onto a goal form found in Section 7. Use one goal form for each feasible opportunity.

Section 6. Analysis and Opportunity Identification (A.R.S. §49-963.J.7)

Requirement: Provide an analysis identifying pollution prevention opportunities to reduce or eliminate toxic substance releases and hazardous waste generation.

Answer the following questions that apply to your operation, activity or process. Only current processes should be discussed in Section 6. Completed or historic pollution prevention projects, activities or accomplishments should be discussed in Section 10. **Note: Even if you believe your facility has no feasible opportunities for reducing hazardous waste generation or toxic usage, you must discuss that here in Section 6.**

Process Review**1. Process Area (# _____):****2. Process Information**

The analysis information should be a narrative. The information may come from your "input-output" diagram or "input-output" table, from your root cause analysis results summary, or from other process analysis tools or methods. Those tools are commonly used to help visualize and develop the root cause of emissions toxic substance use and waste.

To assure that you have provided complete P2 analysis process information, check the corresponding boxes below as you answer that question in your review. These boxes provide a confirmation that the information was included in the Plan. **Please use additional sheets if the process details cannot fit in the spaces provided below.**

- a. Describe the process steps. _____
- b. Discuss the toxic substances (inputs) used in the process and why they are used. _____
- c. Discuss the wastes and emissions (output) generated by the process. Include wastes and emissions due to spills, cleaning, maintenance, unused or expired raw materials, etc, and include waste codes. _____
- d. Describe what happens to each waste and emission. (Is it disposed, segregated recycled, treated, incinerated, released to air, etc?) _____
- e. Discuss whether raw material purchases produce packaging material that must be handled? (i.e. pallets, drums, bags, etc.) If so, describe what happens to this material? _____
- f. Discuss the root cause of each waste generation, emission or toxic substance use. _____

Section 6. (Continued)-

3. Are there pollution prevention opportunities? *Your P2 analysis involves re-thinking how this process or function may be accomplished in other ways that might prove to be environmentally preferable, while still meeting cost and performance requirements. The waste management hierarchy and the different levels and kinds of pollution prevention techniques (alternatives) should be considered, such as using substitute products, technology changes, improved work practices, etc. Refer to the pollution prevention techniques table elsewhere in this document for examples.*

As a result of your P2 analyses, answer the questions below.

Can the process "inputs" or method, etc., be eliminated or modified to reduce waste, emission(s) or toxic substance use?

Yes

No

Can any of the toxic or non-toxic substances be:

Eliminated?

Replaced with a less toxic substitute?

Used less?

Recycled or reused?

Reformulated to reduce toxicity?

None of these

Other _____

4. Based on the results from item 3 above: Describe the pollution prevention opportunities to: eliminate at the source, reduce at the source, reduce toxicity, reduce the volume, reuse or recycle each waste, emission or use of the toxic substance.

Opportunity (A): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (B): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (C): (Describe): _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Write each feasible opportunity onto a goal form found in Section 7. Use one goal form for each feasible opportunity.

Section 6. Analysis and Opportunity Identification (A.R.S. §49-963.J.7)

Requirement: Provide an analysis identifying pollution prevention opportunities to reduce or eliminate toxic substance releases and hazardous waste generation.

Answer the following questions that apply to your operation, activity or process. Only current processes should be discussed in Section 6. Completed or historic pollution prevention projects, activities or accomplishments should be discussed in Section 10. **Note: Even if you believe your facility has no feasible opportunities for reducing hazardous waste generation or toxic usage, you must discuss that here in Section 6.**

Process Review

1. Process Area (# _____):

2. Process Information

The analysis information should be a narrative. The information may come from your "input-output" diagram or "input-output" table, from your root cause analysis results summary, or from other process analysis tools or methods. Those tools are commonly used to help visualize and develop the root cause of emissions toxic substance use and waste.

To assure that you have provided complete P2 analysis process information, check the corresponding boxes below as you answer that question in your review. These boxes provide a confirmation that the information was included in the Plan. **Please use additional sheets if the process details cannot fit in the spaces provided below.**

- a. Describe the process steps. _____

- b. Discuss the toxic substances (inputs) used in the process and why they are used. _____

- c. Discuss the wastes and emissions (output) generated by the process. Include wastes and emissions due to spills, cleaning, maintenance, unused or expired raw materials, etc, and include waste codes. _____

- d. Describe what happens to each waste and emission. (Is it disposed, segregated recycled, treated, incinerated, released to air, etc?) _____

- e. Discuss whether raw material purchases produce packaging material that must be handled? (i.e. pallets, drums, bags, etc.) If so, describe what happens to this material? _____

- f. Discuss the root cause of each waste generation, emission or toxic substance use. _____

Section 6. (Continued)-

3. Are there pollution prevention opportunities? *Your P2 analysis involves re-thinking how this process or function may be accomplished in other ways that might prove to be environmentally preferable, while still meeting cost and performance requirements. The waste management hierarchy and the different levels and kinds of pollution prevention techniques (alternatives) should be considered, such as using substitute products, technology changes, improved work practices, etc. Refer to the pollution prevention techniques table elsewhere in this document for examples.*

As a result of your P2 analyses, answer the questions below.

Can the process “inputs” or method, etc., be eliminated or modified to reduce waste, emission(s) or toxic substance use?

Yes

No

Can any of the toxic or non-toxic substances be:

Eliminated?

Replaced with a less toxic substitute?

Used less?

Recycled or reused?

Reformulated to reduce toxicity?

None of these

Other _____

4. Based on the results from item 3 above: Describe the pollution prevention opportunities to: eliminate at the source, reduce at the source, reduce toxicity, reduce the volume, reuse or recycle each waste, emission or use of the toxic substance.

Opportunity (A): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (B): (Describe) _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Opportunity (C): (Describe): _____

Will this opportunity be developed into a goal?

YES, fill out a goal form in Section 7, **Goal number:** _____

NO, give the reason here: _____

Write each feasible opportunity onto a goal form found in Section 7. Use one goal form for each feasible opportunity.

Section 7. P2 Performance Goal (A.R.S. §49-963.J.4.)

Facility Name:

P2 ID #:

Complete one form for each goal

<p>1. Goal Statement: Enter a specific performance goal or individual production process goal that includes a statement of the expected result. The goal statement should address what can be accomplished by implementing one of the opportunities from Section 6. Goal statements should be in the form (Action Verb) + (Target chemical, emission, or waste stream) used for/in (Process X). Use action verbs such as Reduce or Eliminate. For example: Reduce methylene chloride used for parts degreasing by 80%. If a goal cannot be measured or will take a long period of time to complete, then include an action plan that outlines measurable milestones. See page 48 of the guidance manual for an example of an action plan. Submit these goal sheets with your new plan or amendment and the annual progress report.</p>	<p>2. Scheduled Completion Date (Month/Day/Year)</p>	<p>3. Completion Status: OS=On Schedule DR= Dropped D = Delayed C=Completed</p>	<p>4. Name of Toxic Substance and Waste stream Include CAS #; and RCRA Waste Code #</p>	<p>5. State Volatile Organic Chemical "VOC", Ozone Depleting Chemical "ODC", "Both" or "NA"</p>
<p>Goal (#): Process Area(s) (#) Goal Statement:</p>		<p><input type="checkbox"/> C <input type="checkbox"/> OS <input type="checkbox"/> D <input type="checkbox"/> DR</p>		<p><input type="checkbox"/> VOC <input type="checkbox"/> ODC <input type="checkbox"/> ODC & VOC <input type="checkbox"/> NA</p>

6. If this goal has been delayed or dropped (box 3), provide an explanation and include a new estimated completion date: _____

<p>7. Actions Needed to Implement the Goal:</p>	<p>8. Baseline Quantity (Starting amount)</p>	<p>9. Baseline Year</p>	<p>10. How much was reduced or eliminated?</p>	<p>11. Month & Year Box #10 Was Measured</p>	<p>12. How much money (US \$) was saved by this goal?</p>	<p>13. Reduction Quantity is Adjusted for Production?</p>	<p>14. Production Ratio (Optional Unless Box #13 is Marked Yes)</p>
<p>Actions we will take to implement this goal are:</p>	<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>		<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>			<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

Section 7. P2 Performance Goal (A.R.S. §49-963.J.4.)

Facility Name:

P2 ID #:

Complete one form for each goal

<p>1. Goal Statement: Enter a specific performance goal or individual production process goal that includes a statement of the expected result. The goal statement should address what can be accomplished by implementing one of the opportunities from Section 6. Goal statements should be in the form (Action Verb) + (Target chemical, emission, or waste stream) used for/in (Process X). Use action verbs such as Reduce or Eliminate. For example: Reduce methylene chloride used for parts degreasing by 80%. If a goal cannot be measured or will take a long period of time to complete, then include an action plan that outlines measurable milestones. See page 48 of the guidance manual for an example of an action plan. Submit these goal sheets with your new plan or amendment and the annual progress report.</p>	<p>2. Scheduled Completion Date (Month/Day/Year)</p>	<p>3. Completion Status: OS=On Schedule DR= Dropped D = Delayed C=Completed</p>	<p>4. Name of Toxic Substance and Waste stream Include CAS #; and RCRA Waste Code #</p>	<p>5. State Volatile Organic Chemical "VOC", Ozone Depleting Chemical "ODC", "Both" or "NA"</p>
<p>Goal (#): Process Area(s) (#) Goal Statement:</p>		<p><input type="checkbox"/> C <input type="checkbox"/> OS <input type="checkbox"/> D <input type="checkbox"/> DR</p>		<p><input type="checkbox"/> VOC <input type="checkbox"/> ODC <input type="checkbox"/> ODC & VOC <input type="checkbox"/> NA</p>

6. If this goal has been delayed or dropped (box 3), provide an explanation and include a new estimated completion date: _____

7. Actions Needed to Implement the Goal:	8. Baseline Quantity (Starting amount)	9. Baseline Year	10. How much was reduced or eliminated?	11. Month & Year Box #10 Was Measured	12. How much money (US \$) was saved by this goal?	13. Reduction Quantity is Adjusted for Production?	14. Production Ratio (Optional Unless Box #13 is Marked Yes)
<p>Actions we will take to implement this goal are:</p>	<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>		<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>			<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

Section 7. P2 Performance Goal (A.R.S. §49-963.J.4.)

Facility Name:

P2 ID #:

Complete one form for each goal

<p>1. Goal Statement: Enter a specific performance goal or individual production process goal that includes a statement of the expected result. The goal statement should address what can be accomplished by implementing one of the opportunities from Section 6. Goal statements should be in the form (Action Verb) + (Target chemical, emission, or waste stream) used for/in (Process X). Use action verbs such as Reduce or Eliminate. For example: Reduce methylene chloride used for parts degreasing by 80%. If a goal cannot be measured or will take a long period of time to complete, then include an action plan that outlines measurable milestones. See page 48 of the guidance manual for an example of an action plan. Submit these goal sheets with your new plan or amendment and the annual progress report.</p>	<p>2. Scheduled Completion Date (Month/Day/Year)</p>	<p>3. Completion Status: OS=On Schedule DR= Dropped D = Delayed C=Completed</p>	<p>4. Name of Toxic Substance and Waste stream Include CAS #; and RCRA Waste Code #</p>	<p>5. State Volatile Organic Chemical "VOC", Ozone Depleting Chemical "ODC", "Both" or "NA"</p>
<p>Goal (#): Process Area(s) (#) Goal Statement:</p>		<p><input type="checkbox"/> C <input type="checkbox"/> OS <input type="checkbox"/> D <input type="checkbox"/> DR</p>		<p><input type="checkbox"/> VOC <input type="checkbox"/> ODC <input type="checkbox"/> ODC & VOC <input type="checkbox"/> NA</p>

6. If this goal has been delayed or dropped (box 3), provide an explanation and include a new estimated completion date: _____

7. Actions Needed to Implement the Goal:	8. Baseline Quantity (Starting amount)	9. Baseline Year	10. How much was reduced or eliminated?	11. Month & Year Box #10 Was Measured	12. How much money (US \$) was saved by this goal?	13. Reduction Quantity is Adjusted for Production?	14. Production Ratio (Optional Unless Box #13 is Marked Yes)
<p>Actions we will take to implement this goal are:</p>	<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>		<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>			<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

Section 7. P2 Performance Goal (A.R.S. §49-963.J.4.)

Facility Name:

P2 ID #:

Complete one form for each goal

<p>1. Goal Statement: Enter a specific performance goal or individual production process goal that includes a statement of the expected result. The goal statement should address what can be accomplished by implementing one of the opportunities from Section 6. Goal statements should be in the form (Action Verb) + (Target chemical, emission, or waste stream) used for/in (Process X). Use action verbs such as Reduce or Eliminate. For example: Reduce methylene chloride used for parts degreasing by 80%. If a goal cannot be measured or will take a long period of time to complete, then include an action plan that outlines measurable milestones. See page 48 of the guidance manual for an example of an action plan. Submit these goal sheets with your new plan or amendment and the annual progress report.</p>	<p>2. Scheduled Completion Date (Month/Day/Year)</p>	<p>3. Completion Status: OS=On Schedule DR= Dropped D = Delayed C=Completed</p>	<p>4. Name of Toxic Substance and Waste stream Include CAS #; and RCRA Waste Code #</p>	<p>5. State Volatile Organic Chemical "VOC", Ozone Depleting Chemical "ODC", "Both" or "NA"</p>
<p>Goal (#): Process Area(s) (#) Goal Statement:</p>		<p><input type="checkbox"/> C <input type="checkbox"/> OS <input type="checkbox"/> D <input type="checkbox"/> DR</p>		<p><input type="checkbox"/> VOC <input type="checkbox"/> ODC <input type="checkbox"/> ODC & VOC <input type="checkbox"/> NA</p>

6. If this goal has been delayed or dropped (box 3), provide an explanation and include a new estimated completion date: _____

7. Actions Needed to Implement the Goal:	8. Baseline Quantity (Starting amount)	9. Baseline Year	10. How much was reduced or eliminated?	11. Month & Year Box #10 Was Measured	12. How much money (US \$) was saved by this goal?	13. Reduction Quantity is Adjusted for Production?	14. Production Ratio (Optional Unless Box #13 is Marked Yes)
<p>Actions we will take to implement this goal are:</p>	<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>		<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>			<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

Section 7. P2 Performance Goal (A.R.S. §49-963.J.4.)

Facility Name:

P2 ID #:

Complete one form for each goal

<p>1. Goal Statement: Enter a specific performance goal or individual production process goal that includes a statement of the expected result. The goal statement should address what can be accomplished by implementing one of the opportunities from Section 6. Goal statements should be in the form (Action Verb) + (Target chemical, emission, or waste stream) used for/in (Process X). Use action verbs such as Reduce or Eliminate. For example: Reduce methylene chloride used for parts degreasing by 80%. If a goal cannot be measured or will take a long period of time to complete, then include an action plan that outlines measurable milestones. See page 48 of the guidance manual for an example of an action plan. Submit these goal sheets with your new plan or amendment and the annual progress report.</p>	<p>2. Scheduled Completion Date (Month/Day/Year)</p>	<p>3. Completion Status: OS=On Schedule DR= Dropped D = Delayed C=Completed</p>	<p>4. Name of Toxic Substance and Waste stream Include CAS #; and RCRA Waste Code #</p>	<p>5. State Volatile Organic Chemical "VOC", Ozone Depleting Chemical "ODC", "Both" or "NA"</p>
<p>Goal (#): Process Area(s) (#) Goal Statement:</p>		<p><input type="checkbox"/> C <input type="checkbox"/> OS <input type="checkbox"/> D <input type="checkbox"/> DR</p>		<p><input type="checkbox"/> VOC <input type="checkbox"/> ODC <input type="checkbox"/> ODC & VOC <input type="checkbox"/> NA</p>

6. If this goal has been delayed or dropped (box 3), provide an explanation and include a new estimated completion date: _____

<p>7. Actions Needed to Implement the Goal:</p>	<p>8. Baseline Quantity (Starting amount)</p>	<p>9. Baseline Year</p>	<p>10. How much was reduced or eliminated?</p>	<p>11. Month & Year Box #10 Was Measured</p>	<p>12. How much money (US \$) was saved by this goal?</p>	<p>13. Reduction Quantity is Adjusted for Production?</p>	<p>14. Production Ratio (Optional Unless Box #13 is Marked Yes)</p>
<p>Actions we will take to implement this goal are:</p>	<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>		<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>			<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

Section 7. P2 Performance Goal (A.R.S. §49-963.J.4.)

Facility Name:

P2 ID #:

Complete one form for each goal

<p>1. Goal Statement: Enter a specific performance goal or individual production process goal that includes a statement of the expected result. The goal statement should address what can be accomplished by implementing one of the opportunities from Section 6. Goal statements should be in the form (Action Verb) + (Target chemical, emission, or waste stream) used for/in (Process X). Use action verbs such as Reduce or Eliminate. For example: Reduce methylene chloride used for parts degreasing by 80%. If a goal cannot be measured or will take a long period of time to complete, then include an action plan that outlines measurable milestones. See page 48 of the guidance manual for an example of an action plan. Submit these goal sheets with your new plan or amendment and the annual progress report.</p>	<p>2. Scheduled Completion Date (Month/Day/Year)</p>	<p>3. Completion Status: OS=On Schedule DR= Dropped D = Delayed C=Completed</p>	<p>4. Name of Toxic Substance and Waste stream Include CAS #; and RCRA Waste Code #</p>	<p>5. State Volatile Organic Chemical "VOC", Ozone Depleting Chemical "ODC", "Both" or "NA"</p>
<p>Goal (#): Process Area(s) (#) Goal Statement:</p>		<p><input type="checkbox"/> C <input type="checkbox"/> OS <input type="checkbox"/> D <input type="checkbox"/> DR</p>		<p><input type="checkbox"/> VOC <input type="checkbox"/> ODC <input type="checkbox"/> ODC & VOC <input type="checkbox"/> NA</p>

6. If this goal has been delayed or dropped (box 3), provide an explanation and include a new estimated completion date: _____

7. Actions Needed to Implement the Goal:	8. Baseline Quantity (Starting amount)	9. Baseline Year	10. How much was reduced or eliminated?	11. Month & Year Box #10 Was Measured	12. How much money (US \$) was saved by this goal?	13. Reduction Quantity is Adjusted for Production?	14. Production Ratio (Optional Unless Box #13 is Marked Yes)
<p>Actions we will take to implement this goal are:</p>	<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>		<p>_____QTY. (Check units) <input type="checkbox"/> Pounds <input type="checkbox"/> Gallons <input type="checkbox"/> KWH <input type="checkbox"/> No measure</p>			<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

Section 8. Management Practices and Procedures (A.R.S. §49-963.J.10)

Requirement: Describe provisions to incorporate pollution prevention into management practices and procedures in order to ensure its institutionalization.

Management has developed the following provisions to incorporate pollution prevention into established programs, policies and procedures in order to ensure its institutionalization:

(Check all that apply)

- The Management P2 Policy (Section 4) has been posted.
- Programs, procedures or policies were revised to incorporate Plan goals.

Management informs employees of procedural changes resulting from the Pollution Prevention Plan Goals through various methods including:

- At mandatory monthly operation and safety meetings.
 - Internal memos, directives and information circulars
 - Amendments to the operations manual.
 - Impromptu meetings held to discuss any immediate procedural, operational or equipment changes having to do with pollution prevention.
 - Other: _____
- All production managers will be responsible for assuring Plan activities are incorporated in procedures (where applicable).
 - Pollution prevention is included in employee and manager performance evaluations.
 - Employees are recognized or rewarded for suggesting successful pollution prevention opportunities.
 - Accounting practices allocate the costs of waste management and regulatory compliance practices to the operations that use toxic chemicals or produce wastes or emissions.
 - Pollution prevention considerations are included in procurement and inventory procedures to minimize the unnecessary purchase and accumulation of toxic substances.
 - Other: _____

Section 9: Employee Awareness and Training Programs (A.R.S. §49-963.J.9)

Requirement: The Plan shall include employee awareness training programs to involve employees in P2 planning and implementation to the maximum extent feasible.

Check either box 1 or 2. If you check box 2, you can check box 3 if a sample is needed.

Training is completed and training documents are enclosed:

1. Our facility's P2 training documents are enclosed. We have also included evidence (such as sign in sheet) of how many employees were trained.

Training is not yet completed but a goal is established:

2. We will fill out the training goal sheet found on the following page, place it in the Plan, and implement that goal to develop P2 training. We will send our P2 training documents to ADEQ after conducting training or in the next annual Toxic Data Report. We will also include evidence (such as sign in sheet) of how many employees were trained.
3. ADEQ please send a copy of the example P2 training documents to assist in developing my training program.

(Check all that apply)

PURPOSE (check at least the first box)

- The purpose of the P2 employee training and awareness program is to teach employees about P2 so that they can participate in identifying opportunities and also assist in achieving the Plan goals.
- Additional Purpose: _____

OBJECTIVES (check at least the first box)

- The objectives of this program are to:
- Raise employee awareness of environmental related activities within the facility.
 - Train employees in their P2 responsibilities.
 - Recognize employees for their P2 efforts.
 - Encourage employee participation.
- Additional Objectives: _____

SCOPE (complete all questions)

How frequently will training be held? _____

What types of employees will attend? _____

How will attendance be documented? _____

METHODS (check at least one)

The training methods will include:

- Classroom training session(s) Video presentations
- Newsletters Posters Other: _____

TOPICS (check at least the first box)

- The P2 training topics include the following subjects:
- Definitions related to P2
 - Benefits of P2
 - Waste management hierarchy – Refer to the introduction of the guidance manual
 - Company P2 Plan
 - How to submit P2 ideas
- Additional Topics: _____

Pollution Prevention Training Goal (A.R.S. 49-963.J.9.)

Facility Name:

P2 ID #:

Complete this form and include in Section 7 if no training documents are being sent to ADEQ-P2 at the current time.

<p>1. Goal Statement: (For the training goal, fill in dates and goal number in Box 1. Submit this goal sheet with your plan, or amendment or your annual progress report (until goal is closed). Also, submit the training documents to ADEQ-P2 when completed with your annual progress report.</p>	<p>2. Scheduled Completion Date (Month/Day/Year)</p>	<p>3. Completion Status: OS=On Schedule DR= Dropped D = Delayed C=Completed</p>	<p>4. Name of Toxic Substance and Waste stream Include CAS #; and RCRA Waste Code #</p>	<p>5. State Volatile Organic Chemical "VOC", Ozone Depleting Chemical "ODC", "Both" or "NA"</p>
<p>Goal (#): Process Area(s) (# N/A) Develop a pollution prevention specific employee training program by _____ (date). Send training documents that include evidence (such as sign in sheet) of how many employees were trained to ADEQ-P2 by _____ (date).</p>		<p><input type="checkbox"/> C <input type="checkbox"/> OS <input type="checkbox"/> D <input type="checkbox"/> DR</p>	<p align="center">N/A</p>	<p><input type="checkbox"/> VOC <input type="checkbox"/> ODC <input type="checkbox"/> ODC & VOC <input type="checkbox"/> NA</p>

6. If this goal has been delayed or dropped (box 3), provide an explanation and include a new estimated completion date: _____

<p>7. Actions Needed to Implement the Goal:</p>	<p>8. Baseline Quantity (Starting amount)</p>	<p>9. Baseline Year</p>	<p>10. How much was reduced or eliminated?</p>	<p>11. Month & Year Box #10 Was Measured</p>	<p>12. How much money (US \$) was saved by this goal?</p>	<p>13. Reduction Quantity is Adjusted for Production?</p>	<p>14. Production Ratio (Optional Unless Box #13 is Marked Yes)</p>
<p>The reduction method is to: Training Program as discussed in Section 9 to include employee awareness and training programs to involve employees in pollution prevention planning and implementation to the maximum extent feasible.</p> <p>The number of people trained this year was:</p>	<p align="center">N/A</p>	<p align="center">N/A</p>	<p align="center">N/A</p>	<p align="center">N/A</p>	<p align="center">N/A</p>	<p align="center">N/A</p>	<p align="center">N/A</p>

Section 10. Existing Pollution Prevention Activities (A.R.S. §49-963.J.8)

Requirement: Provide an analysis of pollution prevention activities that are already in place that are consistent with the pollution prevention plan requirements.

This section provides an opportunity for your facility to highlight any pollution prevention activities that have taken place prior to submittal of the pollution prevention plan. **Please only include those activities completed prior to the starting date of this Plan.**

Check ONE of the boxes below.

We have not documented any previous P2 activities at our company.

OR

We have documented P2 activities at our company and have described them below or attached addition pages with information about these projects with this Plan. (Include as much specific information as possible and any available quantitative reduction data without disclosing any confidential business information.)

Describe or list the P2 activities that are already in place including amounts reduced (if available):

Plan Checklist

Instructions: Please include the completed checklist below with the Plan forms.

- Completed and submitted Section 1 for the primary facility.
- Completed and submitted Section 2 with official signature.
- Completed and submitted Section 3 for each facility included in this Plan.
- Completed and submitted Section 4, Pollution Prevention (P2) Policy, provided in the guidance manual, or developed your own policy with the required items: management and corporate support for the P2 Plan, and a commitment to implement the Plan to achieve the Plan goals.
- Completed and submitted Section 5 identifying the scope and objectives, with a Plan time frame of at least two years.
- Completed and submitted a Section 6 analysis for all process areas, each Toxic Release Inventory (TRI) toxic substance that met the Plan filing thresholds and all hazardous or acutely hazardous wastes generated if the facility met the cumulative hazardous waste thresholds.
- Reviewed all process areas and waste streams described in Section 6 for possible pollution prevention opportunities.
- Completed and submitted Section 7 (Plan goals) for each feasible opportunity identified in Section 6.
- Completed and submitted Section 8 (Management Practices) describing how management will incorporate pollution prevention into activities and ensure its institutionalization.
- Completed and submitted Section 9 (Employee Training) outlining the pollution prevention employee awareness training program to occur at your facility, and either completed a training goal or submitted a copy of the facility's pollution prevention training program documents. *Note: Pollution prevention training documents must, as a minimum, include a definition of pollution prevention, a description of the waste management hierarchy, the benefits of pollution prevention and information on how the employees can become involved in pollution prevention planning and implementation. Please also include evidence (such as sign in sheet) of how many employees were trained in P2.*
- Completed and submitted Section 10 (Existing Pollution Prevention Activities) documenting past pollution prevention activities (Not required for an amendment).