

Toxics Use Reduction and Hazardous Waste Reduction Plan

From [Specify year] to [Specify year]
for
[Facility name here]

Policy [This policy statement can be a separate document attached to the Plan.]

I commit [Facility name] to fully engage in continual toxics use and hazardous waste reduction planning and implementation. By signing below, I fully support this plan and the employees who implement it. Furthermore, I commit [Facility name] to implement the goals set forth in this plan.

[Senior manager's or owner's signature]

[Signer's signature block]

Scope, Goal and Objectives

The scope of this plan covers employees and activities related to hazardous materials and waste at [facility name] from [Specify year] to [Specify year]. The overall goal of this Toxics Use and Hazardous Waste Reduction (TUHWR) Plan and associated reduction activities is to eliminate or minimize the toxic substances used and hazardous waste generated. The facility will implement this goal by annually:

- Evaluating current and new technologies that can achieve further reductions of toxic chemicals and hazardous waste;
- Reviewing and updating process and personnel procedures involving hazardous materials use and hazardous waste generation; and
- Training employees about how they can help the facility reduce its toxics use and hazardous waste generated.

Reduction Evaluations

[Facility name] has conducted and will continue to annually conduct internal analyses of its toxic material use and hazardous waste generation. Past toxics use and hazardous waste reduction (TUHWR) activities completed so far include:

- [List those activities here and attach any supporting documents]

While examining our past reduction options, [Facility name] has identified impediments to implementing toxics use and hazardous waste, including:

- [List those impediments here and attach any supporting documents]

Current toxics use and hazardous waste reduction (TUHWR) activities include:

- [List those activities here and attach any supporting documents]

From [Facility's name] [Current year] internal analysis, the following individual chemicals, processes, and facilities were reviewed:

Toxics Used [Minimally, the list below must include any toxic chemical reported under the federal Toxics Release Inventory (TRI) program. You must update the plan annually to reflect

[Toxics Use Reduction and Hazardous Waste Reduction Plan Template]

the most current toxics. Also, we suggest identifying all toxic chemicals, and focus on two or three using the suggested format below.]

[Example 1

Toxics Used: Paint Thinner

Amount: 11 gallons per month (may want to include in the *Implementation Summary*)

Estimated Cost Savings: (11 gallons/mo. x 12 mo.) x \$4.50/gal. = \$594 + \$300 (regulatory, admin., management, insurance, training, health & safety, supplies, etc.) = \$894/year (may want to include in the *Implementation Summary*)

Hazardous Constituents: 30% Toluene, 20% acetone, 10% methyl ethyl ketone

Location: Paint Room

Reason for Use: Thinning paint and cleaning brushes and paint sprayer

Reduction Options: [List options and the evaluation for each including any available options that are technically and economically practicable]

Reduction(s) Implemented: [List option(s) selected especially those that are technically and economically feasible]

Rationale for Options Not Selected: [Reasons for not selecting an option include...]

Reduction Impediment(s):

Hazardous Waste Generated [The list below must include any hazardous waste representing 10% or more by weight of the cumulative hazardous waste generated per year; you must update the Plan annually to reflect the current percentages. Also, we suggest including other wastes that are the highest volume or with the great expense.]]

[Example 2

Waste Generated: Paint Waste

Amount: 20 gallons per year (may want to include in the *Implementation Summary*)

Estimated Cost Savings: [20 gallons x 12 months/year) x 10 pounds/gallon] x \$3.00/pound for disposal = \$720 + \$500 other costs (regulatory, admin., training, management, insurance, health & safety, etc.) = \$1,220/year (may want to include in the *Implementation Summary*)

Hazardous Constituents: Toluene, acetone, methyl ethyl ketone, cadmium

Location: Paint Room

Reason for Generation: Excess paint leftover

Reduction Options: [List options and the evaluation for each including any available options that are technically and economically practicable]

Reduction(s) Implemented: [List option(s) selected, especially those that are technically and economically feasible, that you will later include in the *Implementation Summary* in the *Successes* section.]

Rationale for Options Not Selected: [Reasons for not selecting an option include...]

Reduction Impediment(s): [List the challenges that you may later include in the *Implementation Summary* in the *Challenges* sections.]]

Besides the current and newly-identified toxics use and hazardous waste reduction activities, [Facility name] foresees other reduction opportunities, such as:

[Toxics Use Reduction and Hazardous Waste Reduction Plan Template]

- [List possible future opportunities here, and give the reason why they are the most likely reduction options. You may want to include these or others you identify later in the *Future Opportunities* section of the *Implementation Summary*.]

Training and Education

As part of this plan, the facility is training and educating its employees about TUHWR by:

- [List training and education activities]

Institutionalization

[Facility name] demonstrates its commitment to incorporate TUHWR planning and related activities into management practices and procedures by:

- [List how the company will do this, such as annually update this plan, coordinate these updates with the review and updating of management practices and procedures, etc.]

Implementation

[Facility name] has identified several TUHWR opportunities that are technically and economically feasible. These reduction opportunities, employee tasks and dates are:

[List reduction opportunity, task(s) to implement the reduction(s), implementation dates, and other important factors in implementing this plan. You will want to include these in the *Successes* section of the *Implementation Summary*.]

[Important: After completing a Plan for the first time, you must submit an electronic Notice of Plan/EMS Completion form to DEQ. Also, you must keep the Notice and an updated Plan on site. The only other requirements are to complete an *Implementation Summary* 12 months after submitting a Notice, and a final *Summary* is due 12 months after submitting the first one.]