



## **Pollution Prevention Progress Report (P2PR) Instructions**

### **Minnesota Emergency Planning and Community Right-To-Know Act (EPCRA)**

#### **What will the state of Minnesota do with the P2PR information?**

The Minnesota EPCRA Program will review the report for compliance with Minnesota Statutes, section [115D.08](#). The Minnesota Pollution Control Agency will use the data to understand statewide trends, target technical assistance and identify opportunities for pollution prevention assistance.

#### **Whom do I contact for help?**

For help developing and implementing a Pollution Prevention Plan, contact the Minnesota Technical Assistance Program (MnTAP), a non-regulatory agency, at 1-800-247-0015.

For help completing the P2PR, contact Steve Tomlyanovich of the Minnesota EPCRA Program at 651-201-7417 or [steve.tomlyanovich@state.mn.us](mailto:steve.tomlyanovich@state.mn.us).

#### **Where can I find the P2PR form?**

Use the [Minnesota Pollution Prevention Progress Report](https://app.dps.mn.gov/HSEM_P2PRweb/) web form ([https://app.dps.mn.gov/HSEM\\_P2PRweb/](https://app.dps.mn.gov/HSEM_P2PRweb/)) to complete and submit your P2PR. Complete all sections of the form.

The EPCRA Program assigns each facility a username and a temporary password. Change the password the first time you use the system. The username does not change.

#### **How do I complete the form?**

##### ***Facility Information***

The EPCRA Program database automatically fills in your facility information. If the information is not correct, contact the Minnesota EPCRA Program.

##### ***Chemical Information***

- Click *Add New Chemical*.
- Choose a chemical name or category from the chemical list.
- Enter the baseline year set in your facility Pollution Prevention Plan. You will use the baseline year to measure pollution prevention achievements.

- Enter the quantity of this chemical generated or released during the baseline year.
- Pollution prevention achievements (Minn. Stat., section [115D.07](#), subd. 2)

Your facility's Pollution Prevention Plan has objectives for reducing or eliminating the generation or release of each toxic chemical, and a schedule for achieving the objectives.

Objectives are in numeric terms whenever technically and economically practicable, and assume a constant level of production or activity from one year to the next. Otherwise, a clearly stated list of actions that lead to the establishment of numeric objectives is required.

Select only one of the following types of objective:

- Numeric objective

Note: Chemical *generation* is the sum of EPA Form R, Sections 8.1 through 8.7 (8.1 + 8.2 + 8.3 + 8.4 + 8.5 + 8.6 + 8.7). Chemical *release* is EPA Form R section 8.1 only.

- If you want the EPCRA Program to use the EPA Form R, Section 8, sum of Column C and sum of Column D, you may leave the boxes blank.
- If you want the EPCRA Program to use the numeric objective in your Pollution Prevention Plan, fill in the boxes with the estimated amounts of the chemical generated or released for each reporting (calendar) year.

- Non-numeric objective:

- Enter a brief description of the objective. The objective can be something you are working on or plan to work on in the future. If you achieved the objective in the past you can use this section to give yourself credit.
- Describe the progress you made during the reporting (calendar) year to reach the non-numeric objective.

### ***Process/Activity Information***

Enter the [Process Code](#) or Codes that generate or release this chemical. If the "P" Code does not adequately represent your process, select Code P39 and describe your process in the space provided.

Enter the ["W" Code](#) or Codes that best describe source reduction activities you intend (or intended) to use to meet your numeric objective or expand pollution

prevention activities, and the schedule for implementation. If the “W” Code does not adequately describe your intended activities, use the “other” code.

Enter the “W” Code or Codes that best describe the source reduction activities you used only during the calendar (reporting) year to try to meet your objective. These may or may not match the “W” Codes and dates of implementation you entered under “Intended.” If the “W” Code does not adequately describe the activities you used during the calendar (reporting) year, use the “other” code.

### ***Pollution Prevention Objective***

This is one method you may use to determine whether your facility met its pollution prevention objective for this chemical:

- 1) Add EPA Form R sections 8.1 through 8.7 for the prior reporting year.
- 2) Add sections 8.1 through 8.7 for the current reporting year.
- 3) Multiply the sum calculated in step 1 by the production ratio or activity index (reported in EPA Form R section 8.9). This yields a quantity expected to be generated in the reporting year.
- 4) Take the sum calculated in step 2 and subtract the result of step 3 (the expected quantity).

If the result of step 4 is a negative number, the total quantity of the toxic chemical in waste for the reporting year was less than expected, given the reported level of production or activity. This could show that there is a reduction of the toxic chemical in waste.

If the result of step 4 is a positive number, the amount of toxic chemical in waste for the reporting year was greater than expected, given the reported level of production or activity. This could show that reduction of the toxic chemical in waste is *not* occurring.

If you met your pollution prevention objective, you have completed the P2PR for this chemical.

If you have *not* met your pollution prevention objective, enter the [“F” Code](#) or Codes that best describe the reasons.

### ***Certification***

When you have completed the entire form, print the Certification Page and enter the following information:

- Name, title and phone number of the Facility Manager. Obtain the signature of the Facility Manager and enter the date certified. A Facility

Manager is the highest-ranking manager responsible for operations/production at the facility.

- Name, title and phone number of the Responsible Officer. Obtain the signature of the Responsible Officer and enter the date certified. The Responsible Officer is generally the President, Vice President, Chief Executive Officer, Chief Financial Officer or similar rank with responsibility for facility management and authorized to certify, on behalf of the company, that all statements are believed to be true, accurate and complete (Minn. Stat., section [115D.03](#), subd. 6a).
- Date the facility last updated its Pollution Prevention Plan (required by January 1 of every even-numbered year).
- Consultant's name and phone number, if someone not normally employed by the reporting facility or its parent company prepared the P2PR.
- Name and phone number of the facility Technical Contact (only if different from EPA Form R) the EPCRA Program should contact with questions about this form.

Scan and email the signed Certification Page to the Minnesota EPCRA Program ([steve.tomlyanovich@state.mn.us](mailto:steve.tomlyanovich@state.mn.us)) or mail to 445 Minnesota Street, Suite 223, St. Paul, MN 55101-5223. Only one Certification Page is required per facility.

***Process Descriptions (P Codes)***

- P01 Casting any material
- P02 Chemical mixing (denaturing, formulating, blending, etc.)
- P03 Chemical transferring (packaging, metering, etc.)
- P04 Chemical milling (etching)
- P05 Cleaning any material (degreasing, washing, etc.)
- P06 Combustion
- P07 De-icing
- P08 Developing (non-photographic)
- P09 Drying
- P10 Electroless/Immersion coating
- P11 Electroplating
- P12 Extruding any material
- P13 Fiberglass product manufacturing

- P14 Foam blowing
- P15 Food processing (human and animal)
- P16 Heat treating
- P17 Laminating/Pressing any material
- P18 Lens grinding
- P19 Machining any material (polishing, routing, drilling, etc.)
- P20 Metal melting
- P21 Metal shredding
- P22 Metal treating (anodizing, phosphating, pickling, etc.)
- P23 Molding any material (bending, forming, shaping, etc.)
- P24 Organic coating (painting, varnishing, adhesive, etc.)
- P25 Paper manufacturing
- P26 Photographic processing
- P27 Printing
- P28 Refining
- P29 Refrigerating/Freezing
- P30 Regenerating resin
- P31 Smelting
- P32 Sterilizing (fumigating, disinfecting, etc.)
- P33 Stripping any coating
- P34 Tanning
- P35 Vacuum depositing (vapor, ion, epitaxy, etc.)
- P36 Water treating (neutralizing, evaporating, etc.)
- P37 Weatherizing (wood treating, corrosion inhibiting, etc.)
- P38 Welding any material (soldering, brazing, joining, etc.)
- P39 Other (explain)

**Source Reduction Activities (W Codes)**

*Cleaning and Degreasing*

- W59 Modified stripping / cleaning equipment
- W60 Changed to mechanical stripping / cleaning devices (from solvents or other materials)
- W61 Changed to aqueous cleaners (from solvents or other materials)
- W63 Modified containment procedures for cleaning units
- W64 Improved draining procedures
- W65 Redesigned parts racks to reduce dragout
- W66 Modified or installed rinse systems
- W67 Improved rinse equipment design
- W68 Improved rinse equipment operation
- W71 Other cleaning and degreasing modifications (explain)

*Good Operating Practices*

- W13 Improved maintenance scheduling, recordkeeping, or procedures
- W14 Changed production schedule to minimize equipment and feedstock changeovers
- W15 Introduced in-line product quality monitoring or other process analysis system
- W19 Other changes in operating practices (explain)

*Inventory Control*

- W21 Instituted procedures to ensure that materials do not stay in inventory beyond shelf-life
- W22 Began to test outdated material - continue to use if still effective
- W23 Eliminated shelf-life requirements for stable materials
- W24 Instituted better labeling procedures
- W25 Instituted clearinghouse to exchange materials that would otherwise be discarded
- W29 Other changes in inventory control (explain)

*Process Modifications*

- W50 Optimized reaction conditions or otherwise increased efficiency of synthesis
- W51 Instituted recirculation within a process
- W52 Modified equipment, layout, or piping
- W53 Use of a different process catalyst
- W54 Instituted better controls on operating bulk containers to minimize discarding of empty containers
- W55 Changed from small volume containers to bulk containers to minimize discarding of empty containers
- W56 Reduced or eliminated use of an organic solvent
- W57 Used biotechnology in manufacturing process
- W58 Other process modifications (explain)

*Product Modifications*

- W81 Changed product specifications
- W82 Modified design or composition of products
- W83 Modified packaging
- W84 Developed a new chemical product to replace a previous chemical product
- W89 Other product modifications (explain)

*Raw Material Modifications*

- W41 Increased purity of raw materials
- W42 Substituted raw materials
- W43 Substituted a feedstock or reagent chemical with a different chemical
- W49 Other raw material modifications made (explain)

*Spill and Leak Prevention*

- W31 Improved storage or stacking procedures
- W32 Improved procedures for loading, unloading, and transfer operations
- W33 Installed overflow alarms or automatic shut-off valves
- W35 Installed vapor recovery systems

W36 Implemented inspection or monitoring program of potential spill or leak sources

W39 Other spill and leak prevention (explain)

*Surface Preparation and Finishing*

W72 Modified spray systems or equipment

W73 Substituted coating materials used

W74 Improved application techniques

W75 Changed from spray to other system

W78 Other surface preparation and finishing modifications (explain)

***Barriers to Pollution Prevention (F Codes)***

F01 Insufficient capital to install new source reduction equipment or implement new source reduction activities/initiatives

F02 Lack of technical information on pollution prevention techniques applicable to the specific production process

F03 Pollution prevention / source reduction is not economically feasible

F04 Concern that product quality may decline as a result of source reduction

F05 Technical limitations of the production process

F06 Specific regulatory / permit burdens

F07 Pollution prevention previously implemented - additional reduction does not appear to be technically feasible

F08 Pollution prevention previously implemented - additional reduction does not appear to be economically feasible

F09 Pollution prevention previously implemented - additional reduction does not appear to be feasible due to permitting requirements

F10 Other (explain)