

**Pollution Prevention (P2) Plan “Quick Guide”  
for the Toxic Use category**

**NOTE: Owners or operators of a facility must develop and update a P2 plan for the “Toxic Use” category if the facility is required to report under EPCRA 312 for Extremely Hazardous Substances (EHS’s).**

**A complete P2 Plan must contain the following:**

**1. Management Policy**

A statement of facility-wide management policy regarding toxic use reduction.

**2. Production unit analysis.**

- A. Identification, characterization and accounting of the types and amounts of each EHS chemical(s) used by the facility.
- B. Identification, analysis and evaluation of any appropriate technologies, procedures, processes, equipment or production changes, that may be utilized by the facility to reduce the amount or toxicity of each EHS chemical(s) used by the facility, including a financial analysis of the costs and benefits of reducing the amount of each EHS chemical(s) used. This portion of the plan must employ the hierarchy of reduction techniques established under § 2302 of the Toxics and Hazardous Waste Reduction Law.
- C. A strategy and schedule for implementing practicable reduction options for each production process utilized to meet the facility’s reduction goals; and
- D. A program for maintaining records and management costs for each EHS chemical(s) used.

**Example: Extremely Hazardous Substance (EHS) chemical #1**

- Describe the chemical substitute, process change or modification, or equipment change or modification that will help reduce the use of this EHS chemical
- Discuss the financial costs (good and bad) associated with implementing the above solution by trying to include “seen” costs (substitute chemical costs, equipment purchase costs, etc) and also the “hidden” costs (process change downtime and training, insurance and liability, employee health benefits, regulatory relief including fines and reporting, economic growth from enhanced corporate image)
- If the above solution is practicable, include a possible timeframe for implementation.

## **Extremely Hazardous Substance chemical #2 (etc. for each EHS chemical)**

Repeat steps B, C, and D above

### **3. Facility Goals**

The facility's 2-year numeric goals for reducing the aggregate amount of EHS chemical(s) used by the facility. The goals must be established per unit of product to account for changes in the level of production activity from year to year. (Ex: What are the facility's reduction goals for 2008, 2010 & 2012).

### **4. Internal plan approval**

The signature of a senior official with management responsibility for the person or persons completing the plan.

Signed \_\_\_\_\_ Date \_\_\_\_\_

### **5. Employee involvement, awareness and training**

An employee awareness and training program consistent with the requirements of § 2306 of the Toxics Law, to involve employees in EHS use reduction planning and implementation to the maximum amount feasible.

#### **Example:**

- Monthly or annual meetings where employees are notified of the Extremely Hazardous Substance(s) used by the facility and the efforts the facility is making and will continue to make to reduce them
- Involvement of the employees in the P2 planning process by offering suggestions at meetings, training's or a suggestion box
- Incentive plan for employees to make suggestions, such as monetary awards based on suggestions that end up saving the company money

Not sure if your facility uses any EHS chemicals? Visit EPA's web site for a complete list of EHS chemicals at: [http://www.epa.gov/emergencies/docs/chem/title3\\_Oct\\_2006.pdf](http://www.epa.gov/emergencies/docs/chem/title3_Oct_2006.pdf)

More resource information available at: <http://www.maine.gov/dep/innovation/index.htm>

For assistance with process mapping to identify P2 opportunities call 1-800-789-9802 or visit: <http://www.maine.gov/dep/innovation/contacts.htm>