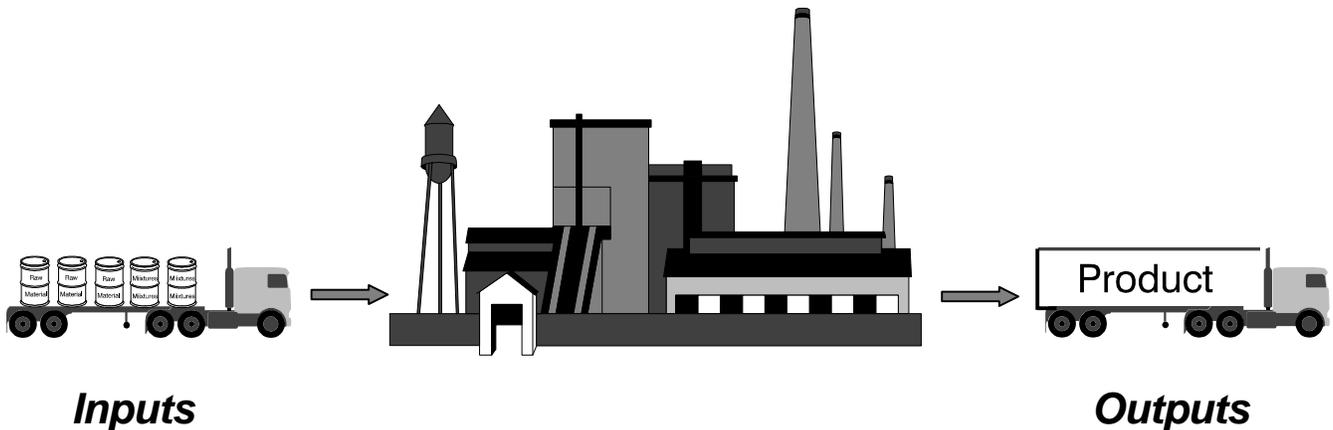




# NEW JERSEY RELEASE AND POLLUTION PREVENTION REPORT (RPPR or DEQ-114)

## REPORTING INSTRUCTIONS



**REMINDER**  
*Electronic Reporting is Mandatory  
and  
Submission is due by  
**JULY 1**  
of the Year  
following the Report Year*

Dear New Jersey Employer:

This is the New Jersey Release and Pollution Prevention Report (RPPR) Instructions. A Release and Pollution Prevention Report must be submitted by every "employer," as defined in the New Jersey Worker and Community Right to Know Regulations (N.J.A.C. 7:1G-1.2), that is subject to the reporting requirements of SARA Title III, Section 313 - the federal Toxic Chemical Release Inventory (TRI). (SARA Title III is also known as the Emergency Planning and Community Right-to-Know Act of 1986 [EPCRA]). All substances subject to reporting under the TRI, whether reported on Form R or Form A, must be reported on the Release and Pollution Prevention Report. A complete list of reportable substances may be found on the Office of Pollution Prevention and Right to Know website at <http://www.state.nj.us/dep/opppc/figdoc.htm>.

The New Jersey Department of Environmental Protection (NJDEP) uses the RPPR to collect data on chemical throughput, multi-media environmental releases, on-site waste management, off-site transfers, and pollution prevention information. The completed report is due to the NJDEP by July 1 of the year following the Report Year. It is important to note that submission of an electronic RPPR is mandatory since reporting year 2004. Also a standard (or maximum) of 5% has been established for the allowable difference between the chemical inputs and outputs. Rule changes were adopted that specify these requirements (see the New Jersey Register, Tuesday, January 18, 2005, page 280). RPPR preparation and submission is accomplished on the NJDEP's electronic reporting website found at <http://www.njdeponline.com>. Hardship exemptions from electronic reporting will be approved on a case-by-case basis.

The New Jersey threshold for reporting is 10,000 pounds for each reportable substance manufactured, processed, or otherwise used at the facility during the reporting year, unless the reportable substance is one of the regulated Persistent, Bioaccumulative and Toxic (PBT) substances, which have a lower threshold. The annual pollution prevention progress reporting requirements for all facilities that have prepared a Pollution Prevention (P2) Plan and have submitted a P2 Plan Summary (DEP-113) to the NJDEP are satisfied by using the Pollution Prevention Process-Level Data Worksheet (P2-115), or alternatively the RPPR Sections C and D, as incorporated into the RPPR.

Please note that paper instructions will no longer be mailed to regulated facilities. Beginning with reporting year 2006, only a reminder letter with appropriate links to our website will be mailed. Between the electronic reporting and the website access, regulated employers should be able to access all information needed to complete and submit the RPPR from any Internet connection.

If assistance is required with this report, please contact the Office of Pollution Prevention and Right to Know at 609- 777-0518.

Sincerely,



Michael DiGiore, Chief  
Office of Pollution Prevention and Right to Know

## **MANDATORY ELECTRONIC REPORTING SUBMIT YOUR RPPR ON-LINE**

New Jersey DEP requires the preparation and submission of the Release and Pollution Prevention Report (RPPR) using the DEP's online portal. You can access and update previous year information as well as create new reports, and you must submit your RPPR to the Department of Environmental Protection (DEP) on the Internet. Simply follow these steps:

### **STEP 1: REQUESTING ACCESS**

(New Users – Users who do not have a NJDEP Online account)

1. Go to <http://www.njdeponline.com> and follow the link labeled “here” within the following sentence: “New users should request access to NJDEP Online here (please see instructions).” This will open a new screen titled “Request Access to DEP-Online.”
2. Fill in all fields.
3. Click on the “Request” button.

### **STEP 2: ACCESS CONFIRMATION**

1. You will receive on-screen confirmation that your request is being processed.
2. Click on the “Continue” button.
3. You will receive an email from [PortalComments@dep.state.nj.us](mailto:PortalComments@dep.state.nj.us) containing a unique Authorization Code as well as instructions for accessing DEP Online through myNewJersey.

### **STEP 3: REGISTRATION**

(Users who have **NOT** registered with myNewJersey)

1. Go to <http://www.nj.gov> and click “Register.”
2. Fill in all fields.
3. Click on “Create myNewJersey Account.” You are now registered with myNewJersey.

### **STEP 4: LOGGING IN & USING AUTHORIZATION CODE**

(Users who have registered with myNewJersey)

1. Go to <http://www.nj.gov> and click the “Login” button.
2. Enter Log On ID and Password and click “Log On.”
3. Click on the “enter authorization code” link.
4. Enter your authorization code and click “Finished.” The system will automatically log you out after clicking “Finished.”

### **STEP 5: FINISHING UP**

1. Log in to your account.
2. Make sure you are on the myNewJersey screen tab.
3. Click on “DEPOnline Services” under DEP Apps.
4. Enter your existing NJDEP Online account ID (your original User ID from NJDEP Online, **NOT** your myNewJersey ID, if different).
5. Only select the checkbox if you did not have a previous NJDEP Online account OR you do not want to transfer your existing data and facilities, and click “Continue.”
6. Add required Contact Information and click “Continue.”
7. Request your Certification PIN using the “Request PIN” button – you will receive this via email from [PortalComments@dep.state.nj.us](mailto:PortalComments@dep.state.nj.us). This PIN is required for Certification and Submittal.

**Note:** After completing these steps, you will be able to access NJDEP Online at any time by visiting <http://www.njdeponline.com> and clicking “Continue” at the top right of the screen.

## **NJDEP Online Instructions for the RPPR after you have logged onto the myNewJersey Portal with your Authorization Code**

Under the five tabs you will see:

“Version x.x

Currently Logged in: Your Name (your User ID)”

You can find the instructions for the Release and Pollution Prevention Report (RPPR) under the Documents and Forms tab.

### **STEP 1: TO ADD YOUR FACILITY**

1. Under the “My Workspace” tab, scroll down to My Facilities/Program Interests section and click on the “Add Facilities” button on the right-hand side.
2. A Facility Search screen will appear; fill in information for CRTK Facility ID or Facility Name. Click “Search” button at bottom right of page.
3. Facility Search Results page will appear. Check the box for the facility(s) you would like to access and click the “Add Selected Facilities” button.
4. Add Facility(s) – you may have multiple facilities under your account.

### **STEP 2: TO ADD YOUR SERVICES**

1. Under the “My Workspace” tab, scroll down to Service Selection and click on the “Configure Services” button on the right-hand side.
2. Check boxes for desired services and click the “OK” button.

### **STEP 3: TO ACCESS YOUR FACILITY AND COMPLETE THE RPPR**

1. Under Right to Know and Pollution Prevention Program in the Service Selection section, click on “Release and Pollution Prevention Report and Pollution Prevention Plan Summary.”
2. The Facility Selection screen will appear; highlight the facility of interest and click on the “Access Facility” button under the selection list.
3. This will bring you to the RPPR and P2 Plan Summary Folder for the facility of interest.
4. Click on the “Create New Report” button, enter the reporting year, and select the radio button for the Release and Pollution Prevention Report.
5. In the RPPR and P2 Plan Summary Folder, click on the link for the new Release and Pollution Prevention Report and you are on your way to preparing the RPPR.

When you have completed the RPPR, the Status will be “Awaiting Certification.” You will need a certification PIN in order to certify and submit your RPPR. If you did not request one at registration, from the RPPR & P2 Plan Summary Folder go to the dropdown list (found in the upper left of the Folder screen) under “Identification” and select “Edit User Profile.” At the DEPOne Services screen, be sure you are at the User Profile tab and click on the “Request Cert Pin” link. In a matter of minutes you should receive a certification PIN by email from [PortalComments@dep.state.nj.us](mailto:PortalComments@dep.state.nj.us). Go back to your Folder by clicking on the “My Workspace” tab, click on “Release and Pollution Prevention Report and Pollution Prevention Plan Summary” and access your facility’s Folder. Click on the “Certification and Submittal” button and check the appropriate certification box(es) and certify with appropriate information. A complete submission will result in a screen with the following message: “The Report certification was successful.” Print two (2) copies of the RPPR; one for the facility and one to be sent to your County Right to Know Lead Agency. DO NOT mail a copy to the DEP.

Information or assistance is available by calling (609) 292-6714, (609) 777-0518 or (609) 984-3219 from 8:00 a.m. – 5:00 p.m.

## ATTENTION

### TRI Form R & Form A Reporters

Please be advised that the NJDEP is partnering with the USEPA on the Toxic Chemical Release Inventory (TRI) Central Data Exchange (CDX) program for the submission of TRI Forms R and A. CDX allows you to file a paperless report, significantly reduce data errors, and receive instant receipt confirmation of your submission. When you use the USEPA's Toxic Release Inventory - Made Easy (TRI-ME) software to prepare and submit your TRI forms via the Internet, your forms will be sent simultaneously to USEPA and NJDEP via the Environmental Information Exchange Network. Further, an Internet-based version of TRI-ME, known as TRI-MEweb, is available and eliminates the need to download software to your PC. TRI-MEweb also includes pre-population of data, an automated Section 8 calculator, and accessibility from any PC anywhere there is Internet access.

Once a TRI submission is certified it will be electronically forwarded to the state and your obligation to report TRI to NJDEP will be satisfied. If you choose to submit via the Internet (TRI-ME or TRI-MEweb), do not send duplicate paper or diskette copies of the TRI reports. If you have any questions about the CDX submission process, call toll free: 1-888-890-1995 between the hours of 8:00 A.M. – 6:00 P.M. Eastern Time.

*It is to your advantage to submit your federal TRI reports (Form R and/or Form A) via CDX, preferably using TRI-MEweb. If you choose to submit on CD or diskette using USEPA's TRI-ME software, the NJDEP will accept a copy of the same data on a CD or diskette, accompanied by a paper copy of the certification letter that you must also file with USEPA. This will fulfill the federal requirement to provide your TRI Form R and/or Form A report(s) to the State of New Jersey.*

**NOTE:** Only the federal TRI data may be submitted on CD or diskette, though USEPA prefers internet submissions. The NJ Release and Pollution Prevention Report must be submitted electronically using the eRPPR online submission module found at NJDEP Online (<http://www.njdeponline.com>).

## ***PLEASE NOTE!***

If you are required to complete and submit a federal Toxic Chemicals Release Inventory Form (TRI Form R or Form A), you must complete and submit an electronic RPPR (eRPPR) by July 1 of the year following the Report Year. See page 2, section I.E. "Who Must Submit the RPPR?" for more details on the reporting requirements.

- DO** Be advised that it is mandatory to complete and submit the RPPR by using the electronic NJDEP ONLINE submission process (New Jersey Administrative Code 7:1G-5.3).
- DO** Be sure to return the *original paper version* of the RPPR to the NJDEP only if you receive a hardship exemption from the electronic reporting requirements from the NJDEP (see page 2, section I.C. Electronic Reporting Hardship Exemption). You will have to call the Office at 609-777-0518 to be mailed an original copy of the reporting forms.
- DO** Be sure to complete all Sections (A, B, and P2-115 or C and D), as appropriate. If you have any questions about this RPPR, call the Office at 609-777-0518.
- DO** Round off estimated quantities to the nearest pound in Section B, questions 4 through 22, and the P2-115 process-level data worksheet. You may use decimal places **only** for the Persistent, Bioaccumulative and Toxic (PBT) substances.
- DO** Check RPPR Appendices B and C online at <http://www.state.nj.us/dep/opppc/figdoc.htm> for the updated list of all reportable substances.
- DO** Be sure to give diligent review of the "Self-Verification of Materials Accounting Data Worksheet" as it displays in the eRPPR reporting module. Check that your estimates are reasonable and comply with your expected level of data quality and accuracy. The W&CRTK rule adoption of January 18, 2005 requires no more than a 5% difference between chemical inputs and outputs.
- DO** Exercise due diligence in completing the entire RPPR and be sure that all data are correctly entered!
- DO NOT** Submit a paper copy of the RPPR that is submitted electronically. If you must submit an RPPR for an additional regulated facility that has not reported in a prior year and need assistance regarding that facility, contact the Office at 609-777-0518.
- DO NOT** Apply any unit of measurement other than pounds in Section B, questions 4 through 22. Note the exception that the unit of measurement for "Dioxin and Dioxin-like Compounds" is grams and not pounds.
- DO NOT** Attempt to use range codes "A," "B" or "C" as found on the USEPA Form R when estimating any quantity of a release, on-site waste management, or off-site transfer on the RPPR Section B, questions 12 through 21, or on the P2-115 of this RPPR; enter only whole numbers as determined by your best estimate (unless you are reporting a PBT; then you may report fractions of pounds using a decimal place).

# INSTRUCTIONS AND REFERENCE GUIDE FOR THE RELEASE AND POLLUTION PREVENTION REPORT

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# **INSTRUCTIONS FOR COMPLETING THE RELEASE AND POLLUTION PREVENTION REPORT (RPPR)**

**PLEASE READ THE FOLLOWING INSTRUCTIONS CAREFULLY!** If after reading the instructions you have any questions regarding the RPPR, please call the Office of Pollution Prevention and Right to Know (the Office) at 609-777-0518.

## **I. INTRODUCTION**

### **A. General Information**

Section 313 of the federal Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA - also known as Title III of the Superfund Amendments and Reauthorization Act of 1986 [SARA] [P.L. 99-499]) requires all manufacturing sector facilities and select non-manufacturing sector facilities to complete the Toxic Chemical Release Inventory (TRI) Reporting Form (Form R), if certain manufacturing, processing, or otherwise use activity thresholds are met. Chemical Activity Definitions are provided in the instructions on pages 10 through 12 and in the RPPR Appendix A found online at <http://www.state.nj.us/dep/opppc/figdoc.htm>. On June 6, 2006 (71 FR 32464) the USEPA published a final rule under EPCRA that amends the TRI to include the North American Industry Classification System (NAICS) codes. The USEPA included the NAICS codes that correspond to the Standard Industrial Classification (SIC) codes that are currently subject to the TRI reporting requirements in order to facilitate the transition from reporting of SIC codes on the TRI reporting forms to reporting of NAICS codes.

The New Jersey Release and Pollution Prevention Report (RPPR) is required by the NJDEP pursuant to the NJ Worker and Community Right to Know Act (P.L. 1983, c.315, N.J.S.A. 34:5A-1.1 et seq.), the NJ Pollution Prevention Act (P.L. 1991, c.235, N.J.S.A. 13:1D-35 et seq.), and the regulations adopted pursuant to these state laws for any "...employer who is subject to the reporting requirements of SARA Title III Section 313...". These are facilities that are required to submit a TRI Form R or Form A. The Form A is the "Certification Statement" that may be submitted for Form R substances that otherwise meet additional reporting criteria. (See Section I.F., The Toxic Chemical Release Inventory Burden Reduction and Alternate Threshold, found on page 3 of these instructions.) The RPPR consists of five parts: Sections A, B, C, and D and the Pollution Prevention Process-Level Data Worksheet (P2-115). Facilities are required to complete and submit Sections A and B, and have the option to submit either the P2-115 Process-Level Data Worksheet or Sections C and D for pollution prevention progress reporting.

### **B. The NJ Release and Pollution Prevention Report (RPPR)**

Pursuant to N.J.A.C. 7:1G & 1K et seq., submission of an electronic Release and Pollution Prevention Report (eRPPR) is mandatory. The portal to electronic reporting is found at <http://www.state.nj.us/dep/online/> or <http://www.njdeponline.com>.

In conjunction with the mandatory requirement to submit an electronic RPPR via the Internet, these instructions have been streamlined and much of the additional contents of the appendices will be found online at <http://www.state.nj.us/dep/opppc/figdoc.htm>. You will find a "sample" copy of the RPPR form and all former appendices that were integral to the instructions book, including substance lists, County Lead Agencies, and pollution prevention methods at this website. If you need assistance, do not hesitate to call the Office at 609-777-0518.

Information to be provided in Section A pertains to the facility site and its overall operations. Only one Section A is prepared and submitted for each reporting facility. Section B consists of questions concerning chemical throughput, environmental release and off-site transfer data, on-site waste

management activities, as well as some general pollution prevention activity data, about each specific reportable substance subject to the RPPR reporting requirements. One RPPR Section B form must be completed for each reportable substance that was manufactured, processed, or otherwise used in excess of 10,000 pounds or the lower PBT threshold. The Pollution Prevention Process-Level Data Worksheet (P2-115) is a spreadsheet that addresses the substance USE and NPO data elements for a five-year P2 planning cycle. Section C focuses on facility-level pollution prevention progress about each specific reportable substance subject to the pollution prevention reporting requirements. Section D focuses on pollution prevention progress for substances within targeted processes or targeted grouped processes identified in a facility's Pollution Prevention Plan. The NJDEP encourages submission of the P2-115 worksheet for each reportable substance in place of Sections C and D for that substance. Note: Even if Sections C and D are submitted and not the P2-115 worksheets as part of the annual RPPR, the P2-115s must still be updated annually and incorporated into the facility's P2 Plan.

### **C. Electronic Reporting Hardship Exemption**

If it is a hardship for an employer to submit an RPPR using the Internet, an employer may request approval from the Department to submit the RPPR in paper form (N.J.A.C. 7:1G-5.3(b)). The Department shall approve, on a case-by-case basis, such a request provided that:

1. The request is submitted no later than March 1 of the submittal year;
2. The employer explains:
  - i. The grounds for the hardship that electronic submittal would impose; and
  - ii. The effort(s) the employer will make to ensure the facility's ability to make electronic submittals in the future; and
3. The employer makes every effort to become able to submit the form electronically in future years.

### **D. Extensions**

The Department shall approve, on a case-by-case basis, an extension of a reporting deadline if a facility is unable to electronically file its RPPR due to a malfunction in the Department's electronic reporting system. The Department shall not approve any extension due to a malfunction in a facility's electronic information technology system, unless the facility verifies the malfunction in writing and promptly files the report by other means.

### **E. Who Must Submit the RPPR?**

"An employer who is subject to the reporting requirements of SARA Title III Section 313, or other criteria established by the Department in accordance with the Administrative Procedures Act, shall submit to the Department a Release and Pollution Prevention Report by July 1 of the year following the reporting year." (N.J.A.C. 7:1G-4.1(a)) If the federal TRI reporting thresholds were exceeded the previous year but were not exceeded in the current reporting year and, therefore, no TRI form submission is required of the employer, complete only questions 1 and 5 and certify and submit Section A of the eRPPR using the reporting module found at <http://www.njdeponline.com>.

Pursuant to the Pollution Prevention regulations (N.J.A.C. 7:1K-3.1(g) and 3.9(d)), if a facility or a substance in a process at a facility is no longer subject to the reporting requirements, the owner or operator shall notify the department in writing by July 1 of the year following the change in status. The notification shall include the reason for the change in status. Send the notification to the address listed on page 32.

Submission of a completed RPPR by July 1 is mandatory. Failure to submit the RPPR may result in compliance actions against the company. It is a requirement to complete and submit the electronic RPPR to the NJDEP and to send a paper copy to the County Lead Agency (see the P2&RTK website at <http://www.state.nj.us/dep/opppc/figdoc.htm>). In addition, a file of all Community Right to Know (CRTK) Surveys and RPPRs must be maintained and the employer must make the CRTK Surveys and RPPRs available to employees within five working days and to State inspectors, or their local designees, upon request (N.J.A.C. 7:1G-5.1(d) and (e)).

## F. Notes on Completing the RPPR

A listed reportable substance must be considered when making threshold determinations and chemical throughput, environmental release, off-site transfer and waste management calculations if it was present in a mixture at a concentration above a specified de minimis level. The de minimis level is 1.0% for non-carcinogens, or 0.1% if the substance meets the OSHA carcinogen standards. See RPPR Appendices B and C online for the de minimis value associated with each listed reportable substance. The de minimis exemption does not apply to the “*manufacture*” of a substance except if that substance is “*manufactured*” as an impurity and remains in the product distributed in commerce, or if the substance is “*imported*” below the applicable de minimis level. The de minimis exemption does not apply to a byproduct “*manufactured*” coincidentally as a result of “*manufacturing*,” “*processing*,” “*otherwise use*,” or any *waste management* activities. The de minimis exemption does not apply to the persistent, bioaccumulative and toxic (PBT) substances.

Complete all sections of the RPPR as they pertain to the facility or plant site. If a question does not apply to the operations, check the appropriate “N/A” box when available or enter “N/A” for “not applicable” on the form.

It is intended that existing or readily available data be used to complete the RPPR. Where quantities can be determined from existing records (e.g., inventory or production figures) or test results are available, actual figures are to be reported. Otherwise, best estimates may be given. Use engineering estimates and computations, process material balance studies, field tests or measurements made by the facility, or other technically sound practices.

While the USEPA requires no more than two significant integers when reporting releases and off-site transfers on the Form R, this practice is not encouraged on the RPPR. The NJDEP encourages the reporting of any estimated quantity to the nearest full pound as calculated or estimated. The mass balance approach of the RPPR provides for the analysis of materials accounting procedures, and the assessment of data quality and discrepancies in the materials accounting process. These analyses are conducted by NJDEP with the knowledge that some quantities are the best available estimates of the “true” value. Therefore, it is important that documentation of calculation methods be retained.

If the formulation of trade name chemicals used in the facility operations are not known, inquiries of the supplier or the manufacturer should be made to ascertain whether the mixture contains any reportable substances. Employers that report under EPCRA Section 313 and New Jersey Community Right to Know must know the chemical composition of the products used in order to accurately make threshold determinations and to calculate use, releases, off-site transfers, etc. Therefore, USEPA requires suppliers of mixtures or trade name products containing one or more of the Section 313 listed chemicals to notify their customers of the presence of those chemicals (supplier notification rule).

When information needed to complete a section is not readily available, make a reasonable effort to acquire the information. If it is still not possible to obtain the necessary information after a reasonable effort is conducted, submit a written explanation to the Office of Pollution Prevention and Right to Know at the address listed on page 32 describing the nature of the operations involved and the reasons for not

supplying the data. Be sure to identify the facility by including the CRTK facility ID number, the facility name and physical location, and the substance or substances to which the explanation applies.

### **G. The Toxic Chemical Release Inventory Burden Reduction and Alternate Threshold**

On December 22, 2006 (71 FR 76932) the USEPA published a final rule under Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) that expands the number of chemical reports that may qualify for the submission of a Form A Certification Statement rather than a Form R under the Toxic Chemicals Release Inventory (TRI). This rule expands non-Persistent, Bioaccumulative and Toxic (non-PBT) chemical eligibility for Form A by raising the eligibility threshold to 5,000 pounds of total annual waste management (i.e. releases, recycling, energy recovery, and treatment for destruction) provided total annual releases of the non-PBT chemical comprise no more than 2,000 pounds of the 5,000 pound total waste management limit. This rule also allows, for the first time, limited use of Form A for PBT chemicals when total annual releases of a PBT chemical are zero and the total annual amount of the PBT chemical recycled, combusted for energy, and treated for destruction does not exceed 500 pounds. Both cases apply as long as the chemical is manufactured, processed, or otherwise used in an amount not exceeding 1 million pounds during the reporting year. A facility that meets the federal TRI alternate threshold reporting criteria for any chemical may submit the *Toxic Chemical Release Inventory Form A* in lieu of a full Form R. For further information on the USEPA TRI alternate threshold, go to <http://www.epa.gov/tri/tridata/modrule/phase2/forma.htm> or contact the EPCRA Hotline at 1-800-424-9346. The TDD number is 1-800-553-7672.

Be advised that the changes to the TRI requirements DO NOT impact your reporting obligations on the RPPR. All substances subject to reporting under the TRI, whether reported on Form R or Form A, must be reported on the Release and Pollution Prevention Report. Further, the New Jersey threshold for reporting is 10,000 pounds for each reportable substance manufactured, processed, or otherwise used at the facility during the reporting year, unless the reportable substance is one of the regulated Persistent, Bioaccumulative and Toxic (PBT) substances, which have a lower threshold.

### **H. Reporting of Persistent, Bioaccumulative and Toxic (PBT) Chemicals**

On October 29, 1999, the USEPA published a final rule (64 Federal Register 58666) under Section 313 of EPCRA, which lowered the EPCRA Section 313 TRI thresholds for certain persistent, bioaccumulative and toxic (PBT) chemicals and added certain other PBT chemicals to the EPCRA Section 313 list of toxic chemicals effective reporting year 2000. The rule also included modifications to certain reporting exemptions and requirements for the chemicals now subject to the lower reporting thresholds. Further, on January 17, 2001, the USEPA published a final rule (66 FR 4500) that classified Lead and Lead Compounds as PBT chemicals and lowered the previously existing 25,000 pound and 10,000 pound reporting thresholds for Lead and Lead Compounds to 100 pounds. The PBT chemicals are of particular concern not only because they are toxic but also because they remain in the environment for long periods of time, are not readily destroyed, and build up or accumulate in body tissue. See RPPR Appendix B online for substance information, the entire list of PBT chemicals, and the lower reporting thresholds.

USEPA has eliminated the de minimis exemption for the PBT chemicals. Users of mixtures must use best readily available information to determine the PBT chemicals present and their concentrations. USEPA has also eliminated range reporting on the Form R for on-site releases and off-site transfers for further waste management for the PBT chemicals affected by these rules.

Pursuant to the NJ Worker and Community Right to Know Regulations (N.J.A.C. 7:1G-1.1 et seq.), the PBT chemicals are to be reported on Section B of the RPPR using the lower TRI thresholds as well. For the PBTs, *and only the PBTs*, you may report fractions of a pound using a decimal place and applying the USEPA guidance on data accuracy and precision. Report chemical throughput, releases and other waste management activities at a level of precision supported by the data and estimation techniques used. For

PBT chemicals, 0.1 pound is the smallest amount required to be reported (except for “Dioxin and Dioxin-like Compounds”). Throughput, environmental release and other waste management estimates  $\leq 0.05$  pounds can be rounded down to 0 pound. Note: for “Dioxin and Dioxin-like Compounds” the unit of measurement is grams or fractions of a gram (and not pounds even though the RPPR form may state “pounds” for the various quantitative fields). For “Dioxin and Dioxin-like Compounds,” 100 micrograms (equals 0.0001 gram) is the smallest amount required to be reported. It is also the smallest amount that can be reported on the eRPPR (the eRPPR allows up to four places to the right of the decimal for all PBTs). Throughput, release and other waste management estimates  $\leq 50$  micrograms (equals 0.00005 gram) may be rounded to 0 grams. While the above text indicates the smallest amount *required to be reported*, if estimation techniques allow for the reporting of smaller quantities, you may do so within the limitations of the reporting software. Data precision and the quantities reported are dependent upon the accuracy and quality of the data and the estimation techniques used.

## I. How to Prepare a Revision of a Previous RPPR Submission

Revisions (voluntary or otherwise) to the RPPR may impact data reported on the TRI Form R and vice versa. It is important to exercise due diligence in the preparation, revision and submission of both forms.

Should you find that a revision to the RPPR is necessary, the following procedure is to be followed for reports that were previously submitted as a *paper* version:

- make a copy of the original submission (only the page or pages that need to be revised);
- cross out the incorrect information in red ink;
- enter the corrected information in red ink (in a space to the right, left, above or below the original entry as space permits);
- indicate "Revision" at the top of each page submitted, making certain that the New Jersey CRTK facility identification number (11 digits), and the substance name and CAS number are clearly noted on each page; and
- submit to the NJDEP Office of Pollution Prevention and Right to Know at the address listed on page 32 and copies of the same to your County Lead Agency.

Should you find that an addendum to the RPPR is necessary (i.e., need to add a substance for a past reporting year that was not previously reported and the original submission for that year was on *paper*), the following procedure is to be followed:

- make a copy of a blank Section B – if you don't have one, you should contact the Office for one;
- enter the complete information for the substance;
- indicate "Addendum" at the top of each page, making certain that the reporting year, the New Jersey CRTK facility identification number (11 digits), and the substance name and CAS number are clearly noted on each page; and
- submit to the NJDEP Office of Pollution Prevention and Right to Know at the address listed on page 32 and copies of the same to your County Lead Agency.

Effective reporting year 2000, revisions and addenda to the RPPR may be completed in electronic format for any submission, current or prior (i.e., back to RY 2000), that was made electronically. Simply go to <http://www.njdeponline.com>, open up the RPPR for the appropriate report year and make the necessary revisions and/or addendum. Then re-certify and submit the revised document. If you have any questions regarding the above procedures, please call the Office of Pollution Prevention and Right to Know at 609-777-0518.

## **II. INSTRUCTIONS FOR COMPLETING SECTIONS A & B OF THE RPPR**

It is mandatory to complete and submit the Release and Pollution Prevention Report (RPPR) using the NJDEP Online Business Portal. This is accessed at <http://www.njdeponline.com> (see pages i and ii of these instructions). If you are approved for the hardship exemption and will submit a paper version of the RPPR; be sure to 1) contact the Office of Pollution Prevention and Right to Know for an original version of the form, 2) type or print legibly all responses on the RPPR, and 3) submit to the NJDEP the original, signed copy of the RPPR and copies of the same to your County Lead Agency.

### **A. Section A. General Facility Information**

The number designations of these instructions correspond to those on the RPPR form unless otherwise indicated.

#### Questions 1 through 10:

1. Person to contact regarding this report - Enter the full name of the person who may be contacted for clarification of the information submitted in this report.

Title - Enter the title of the contact person in this field.

Phone number - Enter the telephone number (including the area code) for the contact person identified here. Enter the 10 digits only; do not use punctuation (e.g. hyphens, parentheses, spaces, etc.).

Fax # - Enter the fax number (including the area code) for the contact person. Enter the 10 digits only; do not use punctuation (e.g. hyphens, parentheses, spaces, etc.).

Contact's address - Enter the full mailing address (including street and/or box number, city, state, and zip code) for the contact person, if different from the facility mailing address.

2. Nature of business - Briefly describe the nature of the business activity conducted at the reporting facility.
3. TRI Facility ID Number - If a federal Form R or Form A has been submitted for a previous reporting year, the U.S. Environmental Protection Agency (USEPA) has assigned a TRI Facility Identification Number to the facility. Enter "New Facility" in this space if this is your first submission. Otherwise, call this Office for the TRI Facility ID Number if the number is not known.
4. NJ RTK Research & Development Laboratory exemption approval number - If this facility has an approved NJ RTK Research & Development Laboratory exemption pursuant to N.J.A.C. 7:1G, it will be pre-populated here. If an exemption applies but the number does not show up here, call the Office at 609-777-0518.
5. USEPA TRI Forms - Indicate whether this facility is subject to filing with the USEPA one or more Toxic Chemical Release Inventory (TRI) Reporting Forms (Form R or Form A) for the current reporting year.

Indicate the number of TRI Form R submitted pursuant to the reporting requirements for the reporting year.

Indicate the number of TRI Form A (alternate threshold form) submitted pursuant to the reporting requirements for the reporting year.

6. Waste Generation and Management Form (Form GM) – This question is applicable for odd number reporting years, i.e. the year the data represents (e.g. 2005, 2007, etc.). Indicate whether this facility is subject to filing with the DEP a Waste Generation and Management Form (Form GM) for the report year. (This form is part of the Hazardous Waste Generator Biennial Report. The Biennial Report is due in an even year for the previous odd number report year.)

This question is "RESERVED" for even number reporting years, again the year the data represents (e.g. 2006, 2008, etc.) (This question refers to the applicability of the Hazardous Waste Generator Biennial Report to your facility.)

7. Wastewater Discharges - Employers are reminded that these questions pertain to overall processes at the facility, and not to the individual reportable substances.

If there is a discharge of a reported substance to a publicly owned treatment works (POTW), provide the name and physical address for the POTW plant to which the facility discharged wastewater containing reportable substances, if applicable. (This is the same information as entered on the Form R, Part II, Section 6.1.) Estimate the average daily volume of wastewater discharged in gallons per day. Briefly describe pretreatment methods, if any, prior to discharge.

If there is a discharge of a reported substance to a surface water, a navigable waterway, or to a tributary system, provide the name of the receiving stream(s) to which your facility discharged wastewater containing reportable substances, if applicable. (This is the same information as entered on the Form R, Part II, Section 5.3.) Estimate the average daily volume of wastewater discharged in gallons per day. Briefly describe pretreatment methods, if any, prior to discharge.

If there is a discharge of a reported substance to groundwater, estimate the average daily volume of wastewater containing reportable substances discharged to groundwater in gallons per day, if applicable. Briefly describe pretreatment methods, if any, prior to discharge.

8. Trade Secret Claims - If a facility owner or operator wishes to file a trade secret claim for information required on the RPPR, obtain the "Trade Secret Claim Instructions (DEQ-119)" from the Office's website at <http://www.state.nj.us/dep/opppc/figdoc.htm> or call the Office at 609-777-0518. All RPPR trade secret claims will require full documentation unless otherwise specified in the "Trade Secret Claim Instructions."

*By using the eRPPR electronic reporting module, only the "public files" (sanitized) version may be completed online. A "confidential" (unsanitized) version must be submitted on paper. All trade secret documentation must be attached to the paper RPPR and both must be submitted to the Department by July 1 of the year following the report year. If documentation for a trade secret claim was provided in a previous year, please specify this information with the submittal. The "confidential" version is to be completed by printing out a hardcopy from the online Internet program. While in the RPPR and P2 Plan Summary Folder, click on the printer icon found to the left of the document to be printed. Select the "Print All" button, which will format the document so that you can print it. Then fill in the confidential data on the printed version and follow the Trade Secret Claim instructions carefully. Under the New Jersey Worker and Community Right to Know Act and regulations, information concerning the generation, treatment, or destruction of nonproduct output including, but not limited to, environmental releases, on-site waste management and off-site transfers of reportable substances may not be claimed as a trade secret. A trade secret claim will be voided if the procedures are not observed.*

Indicate whether this RPPR contains trade secret claims for any information provided within any Section B of this report by selecting "Yes" or "No."

Indicate whether this RPPR contains trade secret claims for any information provided within any Section C or D of this report by selecting "Yes" or "No."

9. Waste Hauler Information - Provide the full name(s) and location(s) - including physical address number and street, city, state and zip code (not P.O. boxes) – and the USEPA ID#, if applicable, or Solid Waste Transporter Registration Identification Number, of the hauler services that transported wastes containing the reported substances to off-site locations. (The Solid Waste Transporter Registration ID# is a five digit number assigned by NJDEP. If you only have a four digit number, add a zero to the beginning of the number, e.g., "1234" is entered as "01234.")
10. Certification of Employer or Duly Authorized Representative – The certification statement will appear on the printed copy following electronic Certification and Submittal. The entire Report must be completed before certification and submittal can be accomplished. (See Section IV., Submitting This Report, page 32.)

## **B. Section B. Facility-Level Substance-Specific Information**

Complete one Section B for each reportable substance that was manufactured, processed, or otherwise used in excess of 10,000 pounds or the PBT threshold, whichever is lower.

### **B.1 Materials Accounting Discrepancy**

The intrinsic value of data is found in the data quality. There has been an increasing effort to improve the quality of the RPPR throughput data over the years. Effective reporting year 2004 and thereafter, a requirement (N.J.A.C. 7:1G-4.1(c)1) states "The difference between input and output quantities in throughput reporting on the Release and Pollution Prevention Report shall not exceed five percent." The electronic reporting system is programmed to allow up to 5% difference. Check that your estimates are reasonable and comply with your expected level of data quality and accuracy.

### **B.2 New Jersey Threshold of 10,000 Pounds**

Pursuant to the reporting requirements established by the New Jersey Pollution Prevention Act and subsequent regulations, any facility that is required to complete one or more federal Toxic Chemical Release Inventory (TRI) Reporting Form (Form R and/or Form A) must complete a New Jersey Release and Pollution Prevention Report for all substances listed in RPPR Appendices B and C that exceeded the 10,000 pound threshold or the lower PBT threshold for manufacture, process, or otherwise use. Therefore, additional substances may be required to be reported on the RPPR that were not subject to reporting under the TRI. Remember that the thresholds for the Persistent, Bioaccumulative and Toxic (PBT) chemicals are much lower than 10,000 pounds! Once an activity (manufacture, process, or otherwise use) threshold is exceeded, the chemical throughput, environmental release, on-site management, off-site transfer, and pollution prevention data must be provided for all activities involving the reportable substance. Again (as noted on page 2, Section I.E.), the Pollution Prevention regulations require a notification if a facility or a substance in a process is no longer subject to the reporting requirements. The owner or operator shall notify the department in writing by July 1 of the year following the change in status. The notification shall include the reason for the change. Send the notification to the address on page 32.

### **B.3 Threshold Determinations for and Reporting of Ammonia (anhydrous and aqueous)**

On June 30, 1995 (60 FR 34182), USEPA issued a final rule that 1) modified the "Ammonia" reporting requirements (60 FR 34172), and 2) deleted ammonium sulfate (solution) and ammonium nitrate (solution) because these and other aqueous ammonium salts are addressed under the ammonia listing. The listing for ammonia now presents the modifier "includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing." The qualifier for ammonia means that anhydrous forms of ammonia are 100

percent reportable and aqueous forms are limited to 10 percent of total aqueous ammonia. Therefore, when determining threshold quantities, 100 percent of anhydrous ammonia is included but only 10 percent of total aqueous ammonia is included. If any ammonia evaporates from aqueous ammonia solutions, 100 percent of the evaporated ammonia is included in threshold determinations and materials accounting calculations. (See the USEPA's TRI guidance on reporting anhydrous ammonia and aqueous ammonia at [http://www.epa.gov/tri/guide\\_docs/index.htm#chemical\\_sp](http://www.epa.gov/tri/guide_docs/index.htm#chemical_sp). You will need Adobe Acrobat Reader 5 or greater in order to view the USEPA's guidance documents.)

With respect to this federal rule, the NJDEP, using available data, recognized that the rule and its accompanying modifications of the ammonia listing potentially had serious implications concerning materials accounting for this substance. For those facilities that manufacture, process and/or otherwise use both anhydrous *and* aqueous forms of ammonia and, therefore, must report environmental releases and/or off-site transfers of ammonia, there is a good probability that a balance in the materials accounting process will not be achieved based upon the reporting of 100% of anhydrous ammonia and 10% of total aqueous ammonia. For any questions about this matter or assistance, call the Office at 609-777-0518.

#### **B.4 Threshold Determinations for and Reporting of Chemical Categories**

A number of chemical compound categories are subject to reporting (see RPPR Appendix C online). When reporting for one of these chemical categories, all individual members of the category that are manufactured, processed, or otherwise used must be totaled and figured into the threshold determination. However, threshold determinations are to be made separately for each of the three defined activities (i.e., manufacture, process, and otherwise use).

Threshold determinations for metal-containing compounds present a special case. For example, if several different "Nickel Compounds" are processed, base the threshold determination on the total weight of all nickel compounds processed. However, if both the "parent" metal "Nickel" (CAS# 7440-02-0) as well as one or more nickel compounds are processed, then make individual threshold determinations for elemental Nickel and Nickel Compounds because they are separately listed reportable substances. If the thresholds for both the parent metal and compounds of that same metal are exceeded, one combined report (e.g., one Section B for "Nickel Compounds" including nickel) may be filed because the inventory, throughput, environmental release, off-site transfer, and pollution prevention information reported in connection with metal compounds will be the total pounds of the parent metal only.

One other case involving metal compounds should be noted. Some metal compounds may contain more than one listed metal. For example, zinc chromate (CAS # 13530-65-9) is both a "Zinc Compound" and a "Chromium Compound." In such cases, if the activity threshold is exceeded, two separate Section B reports are required to be filed – in this case one for Zinc Compounds and one for Chromium Compounds. Apply the total weight of the zinc chromate to the threshold determination for both Zinc Compounds and Chromium Compounds. If the threshold is exceeded for these categories, the amount of each parent metal (i.e., zinc and chromium) would be reported for inventory, throughput, release, transfer, and pollution prevention activities (not the amount of the compound) on each separate Section B form.

#### **B.5 Reporting of Substance-Related Information**

The Facility-Level Substances Folder for the eRPPR lists the substances a facility had reported in the most recent year's RPPR. Electronic reporting from this point forward is set up to continually reference these substances, i.e., the substances in this folder become the default substances for completing the eRPPR. Add or delete substances as necessary from the list, or simply continue in the completion of the Section B for the default list of substances. Sort the list of chemicals by CAS # or Substance Name. Depending on the choice, other relevant data fields will populate automatically.

Verify that all of the reportable substances appear in the Facility-Level Substances Folder. If they do not appear properly, add or delete substances as necessary. When all reportable substances are entered into the folder, it is recommended to select one substance at a time and click on "Modify Selection" to fill out the Section B data.

1. CAS Number (Category Number) and Substance Name (Category Name) are pre-populated from the Facility-Level Substances Folder (when the substance was reported previously).

(Remember- when reporting a compound category in Section B, complete the information for the chemical category only, not each individual substance in the category. As clarified below in #2, metals are to be quantified as the amount of the parent metal only.)

Substance-Specific Trade Secret Claim – Indicate whether any throughput data, Section B questions #5 through #10, have been claimed trade secret on this RPPR by checking "Yes" or "No." Note that questions #5.1 and #10.1 can not be claimed trade secret, as they have to do with nonproduct output. To make a valid claim, obtain and submit the "*Trade Secret Claim Instructions (DEQ-119)*" package (refer to these instructions under Section A, question #8 – page 7 - and then follow the trade secret claims instructions precisely). A trade secret claim will be voided if the procedures are not observed.

2. Activities and Uses of the Substance at the Facility - Indicate whether the substance is manufactured (including imported), processed, or otherwise used at the facility and the general nature of such activities and uses at the facility during the calendar year. Report activities that take place only at the facility, not activities that take place at other facilities involving this facility's products. Check all the blocks in this section that apply! The response to this question should be the same as entered on USEPA Form R, Part II, Sections 3.1 through 3.3. Refer to the definitions of "manufacture," "process," and "otherwise use" which follow and are also found in RPPR Appendix A online.

With respect to the activities and uses of metals and metal compounds, there is a necessary clarification regarding the reporting requirements of the RPPR. Any specific metal or metal compound may be "processed" (as a formulation component) to formulate another metal compound. Some metals (with qualifying conditions) may be "manufactured," while others may be "otherwise used." The appropriate activities should be indicated (checked) in questions #2.1, #2.2, and/or #2.3, and then the estimated amount of the parent metal only is to be reported for inventory, throughput, environmental release, off-site transfer, and pollution prevention activities. While a metal compound may be formulated by processing the parent metal or another metal compound, or a parent metal may be extracted by processing a metal compound, the "quantity produced on site" (question #6) is zero because the facility is not actually manufacturing the parent metal.

There is an **exception** in the case of Aluminum or Zinc with the "fume or dust" qualifier. For these two metals ("fume or dust" form), if they are manufactured, processed, or otherwise used in the qualified form, the appropriate activity threshold must be exceeded to initiate reporting. If "fume or dust" is manufactured, the quantity manufactured would then be reported in question #6, "Quantity Produced on Site."

Similarly, if "fume or dust" is consumed (reacted) in process, the quantity consumed would then be reported in question #8, "Quantity Consumed on Site."

2.1 Manufacture the Substance - Persons who manufacture (including import) the reportable substance must check at least one:

Produce - The substance is produced at the facility.

Import - The substance is imported by the facility into the Customs Territory of the United States.

And check at least one:

For on-site use/processing - The substance is produced or imported and then further processed or otherwise used at the same facility. If you check this block, at least one item in #2.2 or #2.3 must also be checked.

For sale/distribution - The substance is produced or imported specifically for sale or distribution outside the manufacturing facility.

As a byproduct - The substance is produced coincidentally during the production, processing, otherwise use, or disposal of another substance or mixture and, following its production, is separated from that other chemical substance or mixture. Substances produced and released as a result of waste treatment or disposal are also considered byproducts.

As an impurity - The substance is produced coincidentally as a result of the manufacture, processing, or otherwise use of another substance, but is not separated and remains primarily in the mixture or product with that other substance.

2.2 Process the Substance (incorporative activities)

As a reactant - A natural or synthetic substance used in chemical reactions for the manufacture of another chemical substance or of a product. Examples include, but are not limited to, feedstocks, raw materials, intermediates, and initiators.

As a formulation component - A substance added to a product (or product mixture) prior to further distribution of the product that acts as a performance enhancer during use of the product. Examples of substances used in this capacity include, but are not limited to, additives, dyes, reaction diluents, initiators, solvents, inhibitors, emulsifiers, surfactants, lubricants, flame retardants, and rheological modifiers.

As an article component - A chemical substance that becomes an integral component of an article distributed for industrial, trade, or consumer use. One example is the pigment components of paint applied to a chair that is sold.

Repackaging - Processing or preparation of a substance (or product mixture) for distribution in commerce in a different form, state or quantity. This includes, but is not limited to, the transfer of material from a bulk container, such as a tank truck to smaller containers such as cans or bottles.

As an impurity - The substance is processed but is not separated and remains primarily in the mixture or other trade name product with that/those other chemical(s).

### 2.3 Otherwise Use the Substance (non-incorporative activities)

As a chemical processing aid - A substance that is added to a reaction mixture to aid in the manufacture or synthesis of another chemical substance but is not intended to remain in or become part of the product or product mixture. Examples of such substances include, but are not limited to, process solvents, catalysts, inhibitors, initiators, reaction terminators, and solution buffers.

As a manufacturing aid - A substance that aids the manufacturing process but does not become part of the resulting product and is not added to the reaction mixture during the manufacture or synthesis of another chemical substance. Examples include, but are not limited to, process lubricants, metalworking fluids, coolants, refrigerants, and hydraulic fluids.

Ancillary or other use - A substance in this category is used at a facility for purposes other than as a chemical processing aid or manufacturing aid as described above. Examples include, but are not limited to, cleaners, degreasers, lubricants, fuels, listed substances used for treating wastes, and listed substances used to treat water at the facility.

3. Principal Method of Storage – From the dropdown list select the predominant type of container in which the substance is stored on site at the facility. Refer to Table 1, following. Use code OT ("Other") when a container other than the ones listed is employed and describe the method.

BA – Bag	DS – Steel drum
BG – Bottle or jug (glass)	EE – Electrical equipment
BN – Tote bin	HV – HVAC equipment
BP – Bottle or jug (plastic)	OT – Other (describe)
BT – Battery	RC – Rail car
BX – Box	SI – Silo
CB – Carboy	TA – Above ground tank
CN – Can	TB – Below ground tank
CY – Cylinder	TI – Tank inside building
DF – Fiber drum	TW – Tank wagon
DP – Plastic drum	

Frequency of Transfer and Methods of Transfer - Enter the average frequency and the predominant method of transfer used at the facility for the reported substance.

- Example:
- A. "3" times per "week" - "Pneumatic conveying"
  - B. "2" times per "month"  
- "Pumping" (*specify "submerged" or "splash fill"*)
  - C. "8" times per "day" - "Manual bag dumping"

**Note:** If the transfer operation is continuous, skip the "Frequency of Transfer from Storage" field and enter "contin" in the "Times Per" field. Further, enter more detail, e.g. "continuous pumping" in the "Methods of Transfer" field. Restrict the designation of the frequency of transfer to four (4) characters; for example, if the frequency is 10,000 times per year, divide by 12 to report "833 times per month" or divide by 52 to report "192 times per week." In other words, do not report more than "9999" Times Per "time period."

## B.6 Inventory and Throughput Quantity Information

Report all quantities measured in pounds. The unit of measurement for these questions is “pounds” except for “Dioxin and Dioxin-like Compounds” where the unit of measurement is “grams.” **Do not** attempt to use the USEPA TRI Form R range quantity or range code – enter an actual (estimated) quantity. **Do** round quantities up or down to the nearest pound. Do not report fractions of a pound unless the substance is a PBT. **Do not** attempt to include the units of measurement or other notations with the quantity, e.g., "M," "pounds," "lbs.," "kg."

For questions #4 through #22, report the data in estimated quantities of pounds for the report year. If a question does not apply to the operations, check the "N/A" box for "not applicable." Rounding off to two significant integers (as per Form R) is not recommended because of the impact that rounding has on materials accounting calculations.

For each estimate, indicate the principal method used to determine the amount of substance reported. From the dropdown list, select the basis of estimate that identifies the method that applies to the largest portion of the total estimated quantity.

For example, if 40 percent of stack air emissions of the reported substance was derived using monitoring data, 30 percent by mass balance, and 30 percent by emission factors, select “Monitoring” for the Basis of Estimate.

The basis of estimate codes are as follows:

- M - Estimate is based on Monitoring data or Measurements for the substance; e.g., using invoice data or forms; weighing substances in inventory; or as released to the environment and/or transferred to an off-site facility.
- C - Estimate is based on mass balance Calculations, such as a calculation of the amount of the substance in streams entering and leaving process equipment; or calculating the unknown fugitive emissions using the Materials Accounting Worksheet (on page 21) knowing all other variables in the mass balance equation.
- E - Estimate is based on published Emission factors, such as those relating release quantity to throughput or equipment type (e.g., air emission factors).
- O - Estimate is based on Other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgement. This would include applying an estimated removal efficiency to a waste stream, even if the composition of the stream before treatment was fully identified through monitoring data.
- T - The quantity is claimed as a “Trade Secret” under the provisions of the NJ Worker and Community Right to Know Act. Refer to Section B, #1, “Substance-Specific Trade Secret Claim” (page 10) for further details regarding a valid Trade Secret Claim. On the unsanitized (“confidential”) version, which will be a paper copy, indicate both the actual basis of estimate (M, C, E or O) as well as “T” for trade secret.

If the monitoring data, mass balance or emission factor used to estimate the release is not specific to the substance being reported, the form should identify the estimate as based on engineering calculations or best engineering judgement (i.e., "Other" and not "Monitoring," "Calculations" or "Emissions").

If a mass balance calculation yields the flow rate of a waste stream, but the quantity of reported substance in the waste stream is based on solubility data, report "Other" because "engineering calculations" were used as the basis of estimate of the quantity of the substance in the waste stream.

If the concentration of the substance in the waste stream was measured by monitoring equipment and the flow rate of the waste stream was determined by mass balance, then the primary basis of estimate is "Monitoring." Even though a mass balance calculation also contributed to the estimate, "Monitoring" should be indicated because monitoring data were used to estimate the concentration of the waste stream.

Mass balance ("Calculations") should only be indicated if it is directly used to calculate the mass (weight) of the reported substance. Monitoring data ("Monitoring") should be indicated as the basis of estimate only if the chemical concentration is measured in the waste stream being released into the environment. Monitoring data should not be indicated, for example, if the monitoring data relates to a concentration of the substance in other process streams within the facility.

4. Maximum Daily Inventory of Substance - For the reported substance, estimate in pounds the greatest amount that was present at the facility on any single day during the report year. If the substance is part of a mixture, include the quantity of the substance contained in the mixture, not the total quantity of the mixture itself. For chemical categories (e.g., nickel compounds), include all chemical compounds in the category when calculating the maximum amount, using the entire weight of each compound. *This is the only case where the entire quantity of a compound is reported on the form.* (The reported quantity for any substance or category should be covered by the two-digit inventory range code entered on TRI Form R, Part II, Section 4.1.)

Example #1: At one time during the report year, the facility stored a maximum of 10,000 pounds of a mixture containing 10% by weight of toluene. Therefore, 1,000 pounds of toluene were on site. The answer to question 4 would be 1,000 pounds, not 10,000 pounds.

Example #2: At one time during the report year, the facility stored a maximum of 10,000 pounds of a nickel compound containing 40% by weight of nickel. Therefore, 4,000 pounds of nickel were on site. The answer to question 4 would be 10,000 pounds (the entire amount of the compound).

5. Starting Inventory of Substance - Enter the total quantity of the substance already on site as of January 1 (or as close as possible to that date). The total quantity is to include, but not be limited to, the amount of the substance on site as raw material, as a mixture, as (or in) product, as (or in) intermediates, etc., and as (or in) waste that was generated in the prior year and was still on site at the beginning of the year. Note: The Starting Inventory for the report year must be the same as the Ending Inventory for the prior year.
- 5.1 Quantity of Starting Inventory that is Nonproduct Output (NPO) - Report the total quantity of the substance on site at the beginning of the report year (#5 above) that is nonproduct output. Note: The Starting Inventory as NPO for the report year must be the same as the Ending Inventory as NPO for the prior year. (See question #11 for the detailed definition of NPO.)
6. Quantity Produced on Site - Enter the total quantity of the substance produced on site during the report year. The total quantity should include, but not be limited to, both intentional and unintentional syntheses in a production process, isolated intermediates, and quantities generated as NPO (waste), by-products, or impurities. The quantity produced as a transient intermediate, intentional or unintentional, is to be included.

In the case of metals and metal compounds, there is a distinction to be made between the activity definition for “manufacture” and the materials accounting data element of “produced” (see Section B, questions #2.1 vs. #6). Only "Aluminum (fume or dust)" and "Zinc (fume or dust)" may be reported as produced on site. These two forms of the two metals may be produced from metal ingots, chips, solutions, etc. and, therefore, be reported under this question. Otherwise, in a process, a metal compound may be “manufactured” from either the parent metal or another metal compound. If a metal undergoes a change of valence, a metal compound is considered to be “manufactured.” For example, during the combustion process copper in valence state zero changes to copper in valence state +2 in a compound such as copper (II) oxide (CuO). Furthermore, a metallic compound could be transformed to another metallic compound without a change in valence state (e.g., copper (II) chloride (CuCl<sub>2</sub>) is transformed to copper (II) oxide). The transformation to a new compound without a change in valence state is also considered to be “manufactured” for purposes of this reporting requirement. Any metal or metal compound used to “manufacture” another metal compound is reported as "quantity brought on site" (question #7) and the parent metal only is quantified. In the case of a metal or metal compound used to “manufacture” another metal compound, under 2.1, you would check produce and at least one of the boxes to the right (for on-site use/processing, for sale/distribution, as a byproduct, or as an impurity), and then any of 2.2 and/or 2.3, as appropriate, for the purposes of question #2.

7. Quantity Brought on Site - Enter the total quantity of the substance brought into the facility from all off-site suppliers, including other facility locations and divisions of the company, during the report year. The total quantity should include, but not be limited to, substances used as a raw material, a chemical processing aid, a manufacturing aid, or an ancillary material; quantities brought on site and repackaged; quantities brought on site as mixtures; quantities brought on site as recycled substance; and quantities brought on site as (or in) waste.
- 7.1 Quantity of #7 that is Brought on Site as Recycled Substance - Enter the total quantity of the substance brought into the facility (#7 above) as recycled substance from all off-site suppliers, including other facility locations and divisions of the company, during the report year.
8. Quantity Consumed on Site - Enter the total quantity of the substance consumed in production processes during the reporting year. A substance is consumed if its molecular structure is altered, i.e., the substance is reacted and no longer exists in its original chemical form. Quantities of the substance used in a production process that are not chemically reacted are not to be included here.

When reporting a metal, whether as the element or as a component of a metal compound (category), the metal should not be reported as "Consumed on Site" (unless it is aluminum or zinc in a fume or dust form, e.g., metal powder is processed and transformed). The mass of the parent metal can not be chemically altered. Metals usually occur in the form of compounds that must be physically or chemically processed to yield the pure metal. The metal may change valence states, the compound in which the metal is contained may be consumed, a new metal compound may be formulated, but the metal itself is not consumed. Remember, when reporting metals as a component of a compound, only the amount of the parent metal is quantified in each appropriate reporting field.

Example #1: A facility manufactured nitrobenzene by nitrating benzene with a nitric acid-sulfuric acid mixture. Benzene was "consumed" in the production process because it experienced a chemical change and ceased to exist as benzene.

On the other hand, quantities of selected substances that are incorporated in a process but not chemically transformed should not be listed as "consumed."

Example #2: A facility used trichloroethylene (TCE) as a degreasing agent for cleaning metal. Some of the substance evaporated from the process, and the rest became too contaminated for reuse. The quantities are entered as "Air Emissions" (#15 and/or #16) and "Transfers to Other Off-Site Locations" (#21), respectively, not under "Quantity Consumed" (#8).

Example #3: An electroplating facility used metal cyanide compounds in their electroplating operations. More than 25,000 pounds of the metal cyanide compound were processed. The parent metal from the metal cyanide compound was electrochemically plated onto a substrate, leaving the cyanide as a waste product. The parent metal was "processed" while the cyanide compound was "otherwise used." The quantities of the parent metal, reported as "metal compound," are reported as "shipped off site as (or in) product" (#9), "ending inventory" (#10), if appropriate, and any applicable environmental releases, on-site management practices, or off-site transfers. The quantities of the "cyanide compound" are reported as "ending inventory" (#10), if appropriate, "Transfers to Other Off-Site Locations" (#21), and any other appropriate activities.

9. Quantity Shipped off Site as (or in) Product - Enter the total quantity of the substance shipped off the facility site during the report year in a form suitable for final use, as intermediates subject to further processing leading to final use, or even shipped in its "raw" form as found in inventory. Include quantities shipped to other facility locations and divisions of your own company. Also include quantities shipped to locations such as off-site warehouses, vendors, etc. Again, enter the quantity of the substance only, not the total quantity of the mixture within which it is a component. Do not include quantities being shipped off site for recycling, energy recovery, waste treatment, or disposal under this question. These should be reported under question #21. Quantities of the substance that were chemically altered or reacted during processing should be reported under question #8 and not here.
10. Ending Inventory - Enter the total quantity of the substance remaining on site at the end of the report year. The total quantity is to include, but not be limited to, the amount of the substance on site as raw material, as a mixture, as (or in) product, as (or in) intermediates, etc., and as (or in) waste that was generated and was still on site at the end of the year.
- 10.1 Quantity of Ending Inventory that is Nonproduct Output (NPO) - Enter the total quantity of the substance remaining on site at the end of the report year (#10 above) that is nonproduct output. (See next question, #11, for definition of NPO.)
11. Total Nonproduct Output (NPO) – This quantity is calculated by the eRPPR reporting software, equal to the total nonproduct output for the substance for all waste streams generated in the reporting year. NPO will be calculated using the following equation:  
$$\text{NPO} = (12) \text{ Quantity Recycled Out-of-Process on Site and Used on Site} + (13) \text{ Quantity Destroyed through On-Site Treatment} + (14) \text{ Quantity Destroyed through On-Site Energy Recovery} + (15) \text{ Stack Air Emissions} + (16) \text{ Fugitive Air Emissions} + (17) \text{ Total Discharge to POTW} + (18) \text{ Total Discharge to Surface Waters} + (19) \text{ Total Discharge to Groundwater} + (20) \text{ On-Site Land Disposal} + (21) \text{ Transfers to Other Off-Site Locations} + (10.1) \text{ Quantity of Ending Inventory that is NPO} - (5.1) \text{ Quantity of Beginning Inventory that is NPO}$$
12. Quantity Recycled Out-of-Process on Site and Used on Site - Enter the quantity of the substance that was recycled out-of-process on site and then processed or otherwise used again at the facility during the report year. (DO NOT include recycling that occurs in-process!) This question refers

to the method of minimizing the amount of waste to be otherwise managed or disposed by reclaiming reusable materials by the removal of contaminants from the substance to allow it to be used again. Quantities recycled but not used again on site should be reported as one, or more, of the following: 1) an environmental release; 2) an off-site transfer; 3) a product (as co-product) shipped off site; 4) other on-site waste management activity, or 5) part of the year-end inventory.

13. Quantity Destroyed through On-Site Treatment - Enter the total quantity of the substance that was destroyed or neutralized through on-site treatment processes. The total quantity is to include, but not be limited to, that which was destroyed in all waste streams at the facility, i.e., gaseous, wastewater (aqueous), liquid (non-aqueous), and solid waste streams. For the purposes of this question, destroyed includes any method, technique or process, designed to change the physical, chemical, or biological character or composition of the substance so as to neutralize such wastes, or to chemically decompose the waste. (The quantity should be the same as entered on Form R, Part II, Section 8.6, Column B.)
14. Quantity Destroyed through On-Site Energy Recovery - Enter the total quantity of the substance that was destroyed through an on-site energy recovery process. For the purposes of reporting on the RPPR, reportable on-site energy recovery is the combustion of a residual material containing a reported substance as nonproduct output when: a) the combustion unit is integrated into an energy recovery system (i.e., boilers, industrial furnaces, and industrial kilns); and b) the substance is combustible and has a heating value high enough to sustain combustion. Note: metals and metal compounds are not combustible and, therefore, are not to be reported as destroyed through on-site (or off-site) energy recovery. (The quantity should be the same as entered on Form R, Part II, Section 8.2, Column B.)

## **B.7 Environmental Releases and Off-Site Transfers**

Both routine releases, such as stack air emissions, and accidental or non-routine releases, such as chemical spills or wastes generated from clean-up operations on site, must be included in the following questions (#15 through #21).

### Air Emissions

15. Stack Emissions – Enter the total quantity of stack emissions. These are emissions that were released into the atmosphere from a readily-identifiable point source. This definition is intended to include emissions from stacks, exhaust vents, ducts, pipes, or other confined air streams, and storage tanks. (The quantity should be the same as entered on Form R, Part II, Section 5.2.)
16. Fugitive Emissions - Enter the total quantity of fugitive emissions. These are emissions that were not released through stacks, vents, ducts, pipes or any other confined air stream. Included are emissions, evaporation, leakage, or releases from the following sources: blending operations; transfer operations; charging and discharging reaction vessels; storage piles; leaking seals, pumps, flanges, valves, etc.; furnaces or kilns; open vats or pits; crushing, pelletizing or grinding operations; and, loading and unloading operations. (The quantity should be the same as entered on Form R, Part II, Section 5.1.)

### Wastewater Discharges

Questions #17 through #19 address wastewater discharges to publicly owned treatment works (POTWs), to surface waters, and to groundwaters. These questions are only concerned with the quantity of the reported substance that was discharged, not with the volume of the effluent that contained the substance. Thus, if in the report year a discharge of a million gallons of effluent contained 500 pounds of the reported substance, enter "500."

17. Total Discharge to Publicly Owned Treatment Works (POTW) - Enter the total quantity of the substance discharged into a municipal sewer system or one owned by a municipal utilities authority, sewerage authority, or regional utilities authority. (The quantity should be the same as entered on Form R, Part II, Section 6.1.)
18. Total Discharge to Surface Waters - Enter the total quantity of the substance discharged directly into surface waters, other than quantities which went to surface waters via a POTW (#17). (The quantity should be the same as the sum of quantities entered on Form R, Part II, Section 5.3.)
19. Total Discharge to Groundwater - Enter the total quantity of the substance discharged into groundwater from the facility. Discharges onto land, such as spray irrigation, discharges to infiltration basins, and discharges to subsurface systems should be reported under this question as groundwater discharges.

#### On-Site Land Disposal

20. On-Site Land Disposal - On-site land disposal includes, but is not limited to: 1) surface impoundments; 2) on-site landfills; and 3) land treatment (land spreading), including other activities, such as incorporating wastes into soil for treatment within the boundaries of the reporting facility. While item "3 – land treatment" is considered a release to land, any volatilization of a reported substance into the air occurring during the disposal operation must be included in the total fugitive air emissions reported in question #16. Question #20 is organized in tabular form. This question provides for any number of separate entries if different management or disposal methods were applicable to quantities of the reported substance. (See Table 3 on page 19 for a complete listing of applicable management method codes.)

In the first column, select the appropriate code or codes from the dropdown list for the on-site storage method prior to land disposal within the boundaries of the reporting facility.

In the second column, enter the total quantity (in pounds) of NPO (or waste material) disposed on site that contained the reported substance.

In the third column, enter the quantity (in pounds) of the reported substance contained in the disposed NPO. (The sum of the quantities entered here should be the same as the sum of the quantities as entered on Form R, Part II, Section 5.5.1 through 5.5.4.)

In the fourth column, select the appropriate basis of estimate for the quantity of the reported substance that was disposed (or managed) on site.

In the fifth column, select the appropriate management or disposal method from the dropdown list to indicate the method or methods by which the reported substance was managed or disposed on site.

#### Other Off-Site Transfers

21. Transfers to Other Off-Site Locations - In this section provide information as to how NPO containing the reported substance was managed or disposed at other off-site locations. *Do not report POTW discharges here!!* Off-site transfers include transfers to other locations for recycling, energy recovery, treatment, or disposal. Question #21 is organized in tabular form. This question provides space for multiple entries to separate off-site locations. Each off-site location provides space for three (3) entries if different management or disposal methods were applicable to quantities of the reported substance transferred to the identified location.

In the first column, enter the name and physical location, including the street, city, state and zip code and the USEPA ID#, if appropriate, of each final disposal site or off-site management facility to which NPO containing the reported substance was sent, directly or through a hauler. Do not list a transfer facility or brokerage facility as the final treatment or disposal facility, unless the final disposal site is not known.

In the second column, select the appropriate code or codes from the dropdown list for the on-site storage method. (This entry should represent the method by which the selected substance was stored on site as NPO prior to the off-site transfer.)

In the third column, enter the total quantity (in pounds) of transferred NPO (or waste material) that contained the reported substance.

In the fourth column, enter the quantity (in pounds) of the reported substance contained in the transferred NPO. (The quantities entered here should be the same as entered on Form R, Part II, Section 6.2.)

In the fifth column, select the appropriate basis of estimate for the quantity of the reported substance that was transferred off site.

In the sixth column, select the appropriate management or disposal method from the dropdown list to indicate the method or methods by which the reported substance was managed or disposed off site.

Table 2: Nonproduct Output (NPO) Storage Method		
SM-01 Drums	SM-04 Drying Bed	SM-07 Carboy
SM-02 Bulk Tanks	SM-05 Lagoon (lined)	SM-08 Rail car
SM-03 Dumpster	SM-06 Lagoon (unlined)	SM-09 Other

Table 3: Nonproduct Output (NPO) Management Method	
<u>Recycling</u> D20 Solvents/Organics Recovery D24 Metals Recovery D26 Other Reuse or Recovery D28 Acid Regeneration D93 Transfer to Waste Broker - Recycling  <u>Waste Treatment</u> D40 Solidification/Stabilization D50 Incineration/Thermal Treatment D54 Incineration/Insignificant Fuel Value D61 Wastewater Treatment (excluding POTW) D69 Other Waste Treatment D95 Transfer to Waste Broker - Waste Treatment	<u>Disposal</u> D10 Storage Only D41 Solidification/Stabilization - metals & metal category compounds only D62 Wastewater Treatment (excluding POTW) - metals & metal category compounds only D64 Other Landfills D65 RCRA Subtitle C Landfills D66 RCRA Subtitle C Surface Impoundment D67 Other Surface Impoundments D73 Land Treatment D79 Other Land Disposal D81 Underground Injection to Class I Wells D82 Underground Injection to Class II-V Wells D90 Other Off-Site Management D94 Transfer to Waste Broker - Disposal D99 Unknown  <u>Energy Recovery</u> D56 Energy Recovery D92 Transfer to Waste Broker - Energy Recovery

## B.8 Self Verification of Materials Accounting Data Statement

The sum of the reported starting inventory, quantity produced on site, quantity brought on site and quantity recycled out of process & re-used on site should approximately equal the sum of the reported quantity consumed (i.e., chemically reacted), quantity shipped off site as (or in) product, quantity shipped off site as (or in) NPO, quantity destroyed through on-site treatment, quantity destroyed through on-site energy recovery, quantity recycled out of process & re-used on site, total air emissions, total wastewater discharges, on-site land disposals, and ending inventory. (See the Self Verification of Materials Accounting Data Worksheet on page 21 of these instructions.) The eRPPR will present the Self Verification of Materials Accounting Data Worksheet when “Continue” is selected at the end of Section B when the Sum of Inputs does not exactly equal the Sum of Outputs. The Worksheet can also be accessed at any time by clicking on the “View Materials Accounting Worksheet” button at the end of Section B. Remember that the system will allow a difference of up to  $\pm 5\%$ . You should determine if your estimates are reasonable and comply with your expected level of data quality and accuracy.

22. Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes - In this section, enter the total quantity (in pounds) of the reported substance released directly into the environment or sent off site for recycling, energy recovery, treatment, or disposal during the reporting year due to any of the following events:

- (1) remedial actions;
- (2) catastrophic events such as earthquakes, fires, or floods; or
- (3) one-time events not associated with normal or routine production processes.

(The quantity entered here should be the same as entered on Form R, Part II, Section 8.8, and the quantity should be included in the appropriate media field(s) as well. For example, there was a spill of 100 pounds of toluene onto soil. It was estimated that 90% evaporated and 10% remained in the soil. Include 90 pounds in the fugitive air emissions category, #16, and 10 pounds in the on-site land release category, #20, along with all other estimated quantities for these two categories.)

23. Quantity and Units of Production Associated with the Substance - Enter the total quantity of the product(s) manufactured at the facility in which the reported substance was involved in the production process in the “Quantity” field. Combine the units and the product description under the “Units of Measurement and Product Description” field. The units should be the same units of production already identified in the facility’s Pollution Prevention Plan. Do not use values of sales to measure the quantity of production. Space is provided to report up to four (4) products for the current reporting year.

24. Has any reduction or elimination of either the use of the reported substance or the generation of the reported substance as nonproduct output (NPO) occurred during the report year due to discontinuance of operations? - Answer this question “Yes” or “No.” If any reductions in the use of the substance or the generation of the substance as NPO occurred during the reporting year, relative to the quantities for the previous year, due to the discontinuance of operations, including operations transferred to or undertaken by another facility, report the quantity reduced and the basis of estimate.

# Release and Pollution Prevention Report

## Self Verification of Materials Accounting Data Worksheet

(All Quantities Must Be Reported in Pounds except for Dioxin and Dioxin-Like Compounds Reported in Grams)

**FAC ID:** \_\_\_\_\_ **CAS#:** \_\_\_\_\_ **Substance:** \_\_\_\_\_  
(CRTK Facility ID Number)

### Inputs

- 5. Starting Inventory \_\_\_\_\_
- 6. Quantity Produced On Site \_\_\_\_\_
- 7. Quantity Brought On Site \_\_\_\_\_
- 12. Quantity Recycled Out-of-Process & Re-Used On Site \_\_\_\_\_

### Outputs

- 8. Quantity Consumed (chemically reacted) \_\_\_\_\_
- 9. Quantity Shipped Off Site as (or in) Product \_\_\_\_\_
- 10. Ending Inventory \_\_\_\_\_
- 12. Quantity Recycled Out-of-Process & Re-Used On Site \_\_\_\_\_
- 13. Quantity Destroyed through On-Site Treatment \_\_\_\_\_
- 14. Quantity Destroyed through On-Site Energy Recovery \_\_\_\_\_
- 15. Stack Air Emissions \_\_\_\_\_
- 16. Fugitive Air Emissions \_\_\_\_\_
- 17. Discharge to POTWs \_\_\_\_\_
- 18. Discharge to Surface Waters \_\_\_\_\_
- 19. Discharge to Groundwaters \_\_\_\_\_
- 20. On-Site Land Disposal \_\_\_\_\_
- 21. Other Off-Site Transfers \_\_\_\_\_

**Sum of Inputs:** \_\_\_\_\_

≈

**Sum of Outputs:** \_\_\_\_\_

## B.9 Pollution Prevention Activities

25. Has any material-related change (change in the amount of the reported substance used due to substitution of a non-listed substance) been employed to reduce the quantity of this reported substance during the report year relative to the prior year's levels? - Answer this question "Yes" or "No." If the answer is "Yes," enter the quantity of the reported substance that has been reduced in use at the facility in the current year relative to the previous year levels due to substitution of another substance that is not on the list of reportable substances. Select the basis of estimate for the quantity reported. Enter the CAS number, the name, and the quantity of the substance that was used as a substitute. Note: Question #25 focuses only on reduction in the use of the reported substance. Be advised that if a facility reports a reduction as a result of substituting a non-listed substance, the Progress Report must also list the Pollution Prevention Technique applied (the 3-digit codes per Appendix E is "W42").

Example: The facility reduced the processing of benzene by substituting tetrahydrofuran, a non-hazardous substance. Only 30,000 pounds of benzene were processed in the report year as compared to 40,000 pounds of benzene processed in the previous year. This material substitution required that 8,000 pounds of tetrahydrofuran be processed in the report year. Therefore, under "Quantity of Substance Reduced (pounds) (previous to current year)," report 10,000 pounds (40,000 pounds - 30,000 pounds). Indicate the basis of estimate for the quantity reported (M, C, E or O). In addition, provide the CAS number, the name and the quantity of the substituted substance (e.g., tetrahydrofuran). Enter the following information for benzene substitution:

	<u>CAS NUMBER</u>	<u>SUBSTANCE</u>	<u>QUANTITY (pounds)</u>
a)	<u>109-99-9</u>	<u>Tetrahydrofuran</u>	<u>8,000</u>

### P2-115 / Sections C & D Selection

The following questions and information will be presented once you have completed all Section B substance reports and click on the "Continue" button. Carefully read the "P2-115 / Sections C & D Selection" window.

\* 1) Is the answer 'Yes' to any of the following questions?  Yes  No

(If so, the facility may need to modify the Pollution Prevention Plan Summary.)

- Is this the first or second year the facility must submit an RPPR?
- Is this the first time the facility must submit a P2 Plan Summary?
- Are there any hazardous substances being reported for the first time for any of the following reasons?
  - Went above threshold
  - USEPA changed reported threshold
  - USEPA added substance to list
- Did the facility add a process in years two through five of the reporting cycle that is not included in the Plan Summary?

---

As required by N.J.A.C. 7:1K-4.9, the Pollution Prevention Process-Level Data Worksheet (P2-115) must first be prepared and included in the Pollution Prevention Plan that remains on site. One worksheet must be completed for each hazardous substance in each process. Multiple worksheets are therefore required to be in the Plan, except for the simplest case of only one substance in one process at the facility.

The Pollution Prevention Process-Level Data Worksheet(s) (P2-115) may be submitted in lieu of Sections C and D of the RPPR to fulfill the Pollution Prevention Plan Progress Report requirements.

*For data quality reasons, a user may submit only P2-115s or only Cs and Ds for a given year. A combination of both is not acceptable.*

### **III. REQUIREMENTS TO SUBMIT A POLLUTION PREVENTION PROGRESS REPORT**

The owner or operator of a priority industrial facility (one that submits federal TRI forms) is required to prepare and submit a Pollution Prevention (P2) Progress Report by July 1 of each report year after completion of the facility's initial Pollution Prevention Plan. The P2 Process-Level Data Worksheet (P2-115) is the NJDEP-recommended approach to satisfy the P2 Progress Report requirement. Alternatively, Sections C and D of the RPPR may be submitted to satisfy this requirement. The P2 Progress Report (either P2-115 Worksheets or Sections C and D) shall be updated by the date of the next annual submittal as a result of any of the modifications identified in the rule (see N.J.A.C. 7:1K-3.9 and 3.10).

Pursuant to N.J.A.C. 7:1K-3.9(d) regarding a targeted or untargeted source or production process, if the quantity of a hazardous substance used or manufactured annually at your facility decreases below the reportable threshold quantity, the owner or operator shall notify the Department in writing of such change and the reason for the change. You must submit the notification in writing to the address listed on page 32 of these instructions.

**NOTE TO ALL FACILITIES THAT MUST SUBMIT A  
POLLUTION PREVENTION PROGRESS REPORT  
\* THERE ARE TWO REPORTING OPTIONS \***

The Pollution Prevention Program rules, effective March 2000, include two P2 Progress Report options. Both options are intended to provide information about progress that your facility has made toward the pollution prevention goals that were established in your P2 Plan and reported to the Department in your P2 Plan Summary.

OPTION 1 Instructions for Submission of P2-115 – pages 23 - 26

OPTION 2 Instructions for Submission of Sections C & D – pages 27 - 31

#### **A. Progress Reporting Option 1 - Submission of the Pollution Prevention Process-Level Data Worksheet (P2-115)**

The Pollution Prevention Process-Level Data Worksheet (P2-115) may be submitted instead of Sections C and D of the RPPR to fulfill the P2 Plan Progress Report requirement.

Note: As required in N.J.A.C. 7:1K-4.9, the Pollution Prevention Process-Level Data Worksheet (P2-115) must first be prepared and included in the facility's Pollution Prevention Plan that remains on site. One worksheet must be completed for each hazardous substance in each process. Multiple worksheets are therefore required to be in the Plan, except for the simplest case of only one substance in one process at the facility.

##### **A.1 Basic Requirements**

- Only basic data needs to be provided on each worksheet. The eRPPR system will perform the calculations and prepare Sections C and D following completion of the P2-115. A copy of Sections C and D can be printed for the facility files and to send to the County Lead Agency. Note: The data required on the P2-115 worksheet are not new and have always been required to be in the P2 Plan in order to complete Sections C and D of the RPPR.
- The data for the base year are entered in the Base Year column. The base year data should be submitted along with, at a minimum, the data for Year 1. Base Year data are never submitted alone. Base Year data may be newly reported along with the current year of data.

- The data for each of the subsequent years of the five-year planning cycle shall be entered in the appropriate columns on the P2-115 Worksheet. When the eRPPR is certified and submitted, each P2-115 worksheet should be printed and included in the P2 Plan on site.
- The P2-115 Worksheet shall be completed and submitted for each process and substance regardless of whether the process is targeted or not. The P2-115 data should sum up to the facility-level data reported on Section B for each substance.
- Once this option is chosen, it is required that this approach be used for all substances and processes in a given year. Also, for consistency and continuity of tracking, it is recommended that a facility that selects the P2-115 option continue to use this option in subsequent years of the five-year planning cycle, and not revert to Option 2.

## A.2 How to Complete a P2-115 Worksheet

(See the “P2-115 Example” on page 26. Please note that specific Base Years and Report Years are used for representative purposes only, as these instructions may be applied to any Report Year.)

In the P2-115 Folder enter the Process ID, Hazardous Substance, and Base Year for *each* substance in *each* process. This information will pre-populate in subsequent years.

**Process ID** Enter the process identification code identified in the P2 Plan and in the P2 Plan Summary. This ID must be the same as the one found in Section C question #1 of your P2 Plan Summary. The description is limited to 12 characters and no spaces are to be entered. In this Example, “WIDGETLINE” is the Process ID.

**CAS# and Substance Name** Select the hazardous substance used in this process from the substance selection list. In the example, we have selected Toluene, CAS# 108-88-3

**Base Year** Enter the Base Year for this substance as identified in the facility’s P2 Plan and in the P2 Plan Summary. This is usually the year upon which the P2 Plan is based. However, it may be a more recent year if the substance was not in use in the Base Year. In the P2-115 Example on page 26, the Base Year is 2001.

Select a P2-115 Worksheet and click on “Modify Selection” to enter worksheet data.

**Units of Production** Enter the unit of production identified in the P2 Plan and in the P2 Plan Summary; e.g., type of widget, lbs. of substance, ft<sup>2</sup> of product. For this example, unit of production is “widgets manufactured.” The units of production must be consistent over the planning cycle.

**Is process targeted?** Indicate whether or not the process is targeted according to the P2 Plan Summary.

**Is this a grouped process?** Indicate whether or not the process is grouped according to the P2 Plan Summary.

**Production quantity** Enter quantity produced in the unit of “widget,” “lbs.,” “ft<sup>2</sup>,” etc. The units must be consistent with “Units of Production” identified above. In this example, 4,682,005 is entered under “Base Year” to refer to the number of widgets produced in Base Year 2001. Under “Year 5,” this quantity is 4,978,000 for reporting year 2006.

Fill in the components of USE and NPO identified on the worksheet for the current report year (2006 in this example). If the Base Year data has not been entered yet, it must be done now. This means if Sections C and D were prepared and submitted in each of 2002 through 2005 but the decision was made to submit the P2-115 for 2006, then only data for 2001, the Base Year, and 2006 needs to be submitted as part of the 2006 RPPR. Interim years do not have to be filled out.

**USE** The sum of USE (the quantity of hazardous substance consumed, plus shipped off-site as (or in) a product, plus generated as nonproduct output [NPO]) will be calculated by the reporting system. In this example, under "Base Year" the quantity 50,100 pounds of toluene is calculated for USE. Under "Year 5," the quantity is 52,380 for reporting year 2006.

**NPO** The sum of all the components listed below the "NPO" will be calculated by the reporting system and provided in this field. Different types of NPO occur at a facility, all of which are listed on the P2-115. The 11 rows below the "NPO" row are the components of NPO. Refer to Section B for their definitions and only enter the quantity for the substance associated with the process in each question. The NPO under "Base Year" is also 50,100 since all of the use falls into the "otherwise use" activity category. The various components of Base Year NPO applicable to this example are 49,100 pounds (destroyed: on-site treatment), 505 pounds (stack air emissions) and 495 pounds (fugitive emissions). Under "Year 5" 52,380 is calculated for NPO: 49,600 pounds (destroyed: on-site treatment), 1,260 pounds (stack air emissions) and 1,520 pounds (fugitive emissions).

Four (4) specific questions on the P2-115 (also found in Sections C and D of the RPPR) pertain to years 1 through 5, if applicable. Entries are not made for the Base Year. These questions are as follows:

P2 techniques used (implemented) in a given year: In this case, for example, "W59" - Modified stripping/cleaning equipment, and "W61" - Changed to aqueous cleaners (from solvents or other materials) were selected. Use the check list to choose appropriate P2 techniques by clicking on the "Select Techniques" button. (Or see the codes in Appendix E found online at <http://www.state.nj.us/dep/opppc/crtk/andyrppr/rpprapdxe.pdf>.)

Was this process discontinued or sent off site in given year? Select "Y" or "N" as appropriate.

Did facility make a process change (or changes) that triggered a Plan modification? Select "Y" or "N" as appropriate.

Was facility's P2 progress (targeted process only) less than anticipated? Select "Y" or "N" as appropriate.

When all P2-115s are completed, click on the "Continue" button. At this point the program will perform calculations and generate Sections C and D. Review all Sections C and D for your approval. Then click the "OK" button at the bottom left of the page. The RPPR and P2 Plan Summary Folder will display, showing the RPPR status as "Awaiting Certification." The RPPR is now ready for "Certification and Submittal."

**CERTIFICATION OF OWNER AND OPERATOR:** The certification statement with "signature" will appear on the printed copy upon electronic submission, after the completion of the entire Report. (See Section IV., Submitting This Report, page 32.)

**P2-115 Example**

**POLLUTION PREVENTION PROCESS-LEVEL DATA WORKSHEET (P2-115)**

**Note:** This worksheet is required as part of the Pollution Prevention Plan, and is optional as a submittal in lieu of Sections C and D of the Release and Pollution Prevention Report. All Optional submittals are not confidential.

Base Year **2001**

FACID: 1234560000  ACME MANUFACTURING PO BOX 12345 ANYWHERE, NJ 90210
---

Facility Location

Process ID (from P2 Plan Summary)

WIDGETLINE

Units of Production (e.g. type of "widget," lbs. of chemical, square feet of product)

widgets  
manufactured

Is process targeted? (Y/N)

Y

Is this a grouped process? (Y/N)

Y

CAS No.: 108-88-3	Hazardous Substance: Toluene					
	Base Year	Year 1	Year 2	Year 3	Year 4	Year 5
Production quantity (widget, lbs., ft <sup>2</sup> , etc.)	4,682,005	4,820,320	4,923,000	3,843,000	4,708,000	4,978,000
<b>USE</b> (pounds)	50,100	50,410	51,240	46,530	48,380	52,380
Consumed	0	0	1,000	0	0	0
Shipped off-site as (or in) product	0	0	0	0	0	0
<b>NPO</b> (pounds)	50,100	50,410	50,240	46,530	45,380	52,380
Recycled out of process	0	0	0	0	0	0
Destroyed: On-site treatment	49,100	49,400	49,500	43,500	46,600	49,600
Destroyed: On-site energy recovery	0	0	0	0	0	0
Stack air emissions	505	555	560	1,550	960	1,260
Fugitive air emissions	495	455	180	1,480	960	1,520
Discharge to POTWs	0	0	0	0	0	0
Discharge to surface waters	0	0	0	0	0	0
Discharge to groundwater	0	0	0	0	0	0
On-site land disposal	0	0	0	0	0	0
Transferred off site	0	0	0	0	0	0
End. Inv. as NPO minus Starting Inv. as NPO	0	0	0	0	0	0
P2 techniques used in given year (see codes in RPPR Appendix E)		W59, W61				
Was this process discontinued or sent off site in the given year? (Y/N)		N	N	N	N	N
Did facility make process change(s) that triggered a Plan modification? (Y/N)		N	N	N	N	N
Was facility's P2 progress (targeted process only) less than anticipated? (Y/N)		N	N	N	N	N

**CERTIFICATION OF OWNER OR OPERATOR** - I certify under penalty of law that the information submitted on this Pollution Prevention Plan Progress Report is true, accurate and complete to the best of my knowledge.

**Signature:** Submitted and certified electronically by John Doe

**Original Date:** 6/30/2007

**Phone No:** (609) 123 - 4567

**Title:** President

**B. Progress Reporting Option 2**  
- Submission of Sections C and D of the RPPR

**Note: Even if the P2-115 Worksheet(s) is(are) not submitted as part of the RPPR, the P2-115 Worksheet(s) must still be prepared annually and be in the Pollution Prevention Plan.**

Sections C and D include information about progress that has been made toward the pollution prevention goals established in your Pollution Prevention Plan and reported to the NJDEP in the P2 Plan Summary (DEP-113). The instructions on the following pages pertain only to Reporting Option 2 – Sections C and D of the Release and Pollution Prevention Report (RPPR). To simplify the progress report calculations, the information on the P2-115s contained in the P2 Plan will be used to calculate Sections C and D.

Calculations must be included in the P2 Plan and the results of the calculations must be submitted on the eRPPR. Even if no P2 options have been implemented or if zero goals were set, the calculations for all substances must be performed annually to determine progress on USE and NPO, and must be included in the P2 Plan.

The most accurate way to report this progress for pollution prevention planning is by using process-level, substance-specific data (substance use per unit of product and nonproduct output per unit of product). Choosing an appropriate unit of product in the P2 Plan is critical to developing a useful production ratio. This information should have already been collected for all of the production processes and incorporated it into the Pollution Prevention Plan (see N.J.A.C. 7:1K-4.3(b)3ii and 4.3(b)4).

**B.1 Section C. Facility-Level Substance-Specific Pollution Prevention Progress**

The Section C Folder will present the CAS# and Substance Name for each substance for which a Section B was entered. If this list is correct, select a substance (by its “radio button”) and click “Modify Selection” to update the Section C data.

1. CAS # and Substance Name will be pre-populated.
2. Production Ratio - The production ratio normalizes the variation in units produced from one year to the next.

The example below (2.A-1) illustrates the use of process-level data to develop facility-level progress from the P2-115s. Refer to the abbreviated P2-115s on page 29 to identify the variables (by letter) in the example formulae.

2.A. The formula for calculating the Production Ratio relative to the Base Year ( $PR_{BY}$ ) is as follows:

- A - 1. For the simplest scenario, when one substance is used in only one process, the formula for calculating the Production Ratio to the Base Year ( $PR_{BY}$ ) is as follows:

$$PR_{BY} = \frac{H}{A}$$

- A - 2. For those facilities that use one substance in multiple processes, the following formula applies:

$$PR_{BY} = \frac{[(H/A * C) + (T/M * O)]}{(C + O)}$$

- 2.B. The formula for calculating the Production Ratio relative to the Previous Year (PR<sub>PY</sub>) is as follows:

- B - 1. The formula for calculating the Production Ratio, current year to the previous year, for a single substance in a single process is:

$$PR_{PY} = \frac{H}{G}$$

- B - 2. For calculating the Production Ratio using one substance in multiple processes, the formula is:

$$PR_{PY} = \frac{[(H/G * I) + (T/S * U)]}{(I + U)}$$

If the same substance is used in more than two (2) processes, treat the additional processes identical to the way the second process was added to the example of the single process (i.e., add all process-level information to obtain facility-level information).

3. Percent Change for Use and NPO - Calculate the percent change (reduction, increase or no change) in total facility-wide use and total facility-wide NPO generated for each substance from the Base Year to this Reporting Year (current year).

- A - 1. Percent Change for USE for a substance for a single process:

$$\text{Percent Change for USE} = \frac{[(C * PR_{BY}) - J]}{C * PR_{BY}} * 100$$

- A - 2. Percent Change for USE for a substance in multiple processes:

$$\text{Percent Change for USE} = \frac{[(C + O) * PR_{BY} - (J + V)]}{(C + O) * PR_{BY}} * 100$$

- B - 1. Percent Change for NPO for a substance in a single process:

$$\text{Percent Change for NPO} = \frac{[(E * PR_{BY}) - L]}{E * PR_{BY}} * 100$$

B -.2. Percent Change for NPO for a substance in multiple processes:

$$\text{Percent Change for NPO} = \frac{[(E + Q) * PR_{BY} - (L + X)]}{(E + Q) * PR_{BY}} * 100$$

Note: A positive result means a reduction, a negative result means an increase. If P2 progress is negative, the electronic system will require a check box to be checked and an explanation given.

The following two P2-115s are abbreviated to illustrate the variables needed to calculate the Production Ratio (PR) and the Percent Change for USE and NPO, as presented on pages 27 – 29, using process-level information.

<b>POLLUTION PREVENTION PROCESS-LEVEL DATA WORKSHEET (P2-115) FOR 2006</b>						
<b>Base Year <u>2002</u></b>						
FACID: 12345600000  ACME MANUFACTURING PO BOX 12345 ANYWHERE, NJ 90210	Process ID (from P2 Plan Summary) <u>WIDGETLINE</u>					
	Units of Production (e.g. type of "widget," lbs. of chemical, square feet of product) <u>Widgets</u>					
	Is process targeted? (Y/N) <u>Y</u>					
	Is this a grouped process? (Y/N) <u>Y</u>					
<b>CAS No.:</b> 108-88-3		<b>Hazardous Substance:</b> Toluene				
	Base Year	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
<b>Production quantity (widget, lbs., ft<sup>2</sup>, etc.)</b>	<b>A</b>	<b>B</b>	<b>G</b>	<b>H</b>		
<b>USE (pounds)</b>	<b>C</b>	<b>D</b>	<b>I</b>	<b>J</b>		
Consumed						
Shipped off-site as (or in) product						
<b>NPO (pounds)</b>	<b>E</b>	<b>F</b>	<b>K</b>	<b>L</b>		

<b>POLLUTION PREVENTION PROCESS-LEVEL DATA WORKSHEET (P2-115) FOR 2006</b>						
<b>Base Year <u>2002</u></b>						
FACID: 12345600000  ACME MANUFACTURING PO BOX 12345 ANYWHERE, NJ 90210	Process ID (from P2 Plan Summary) <u>THINGAMABOBS</u>					
	Units of Production (e.g. type of "widget," lbs. of chemical, square feet of product) <u>Thingamabobs</u>					
	Is process targeted? (Y/N) <u>Y</u>					
	Is this a grouped process? (Y/N) <u>Y</u>					
<b>CAS No.:</b> 108-88-3		<b>Substance Name:</b> Toluene				
	Base Year	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
<b>Production quantity (widget, lbs., ft<sup>2</sup>, etc.)</b>	<b>M</b>	<b>N</b>	<b>S</b>	<b>T</b>		
<b>USE (pounds)</b>	<b>O</b>	<b>P</b>	<b>U</b>	<b>V</b>		
Consumed						
Shipped off-site as (or in) product						
<b>NPO (pounds)</b>	<b>Q</b>	<b>R</b>	<b>W</b>	<b>X</b>		

## B.2 Section D. Process-Level Pollution Prevention Information for Targeted Processes

Complete one Section D for each targeted process or targeted grouped process identified in the facility's Pollution Prevention (P2) Plan and P2 Plan Summary. This RPPR must have the same number of Sections D as there are Sections D in the Base Year P2 Plan Summary.

1. In the Section D Targeted Process Folder, enter the process identification code identified in the P2 Plan and in the P2 Plan Summary for each targeted process. Select a process and then click "Modify Selection" to add Section D data.
  - Following the "Process ID," check the first box if the facility made a production process change last year that changes information contained in the P2 Plan and P2 Plan Summary. Any changes made by a facility last year as specified in N.J.A.C. 7:1K-3 would require modifications to the P2 Plan and P2 Plan Summary. If the facility made at least one of these changes as identified in the cited rule, the P2 Plan must be modified and a revision of the P2 Plan Summary must be submitted to the NJDEP. (See applicable requirements in N.J.A.C. 7:1K-3.) If this applies to the facility, contact the Office of Pollution Prevention and Right to Know at 609-777-0518.
  - Use the next check box if the facility's reporting year P2 progress for any substance involved with this process was less than anticipated. If this box is checked, an explanation is required in the text box below the check box stating why progress was less than anticipated.
2. CAS# and Substance Name(s) may be pre-populated. If not, click "Add Substance" to select the substance(s).
  - To complete this Section D, refer to the units of product, which were identified in the P2 Plan. Once the appropriate units of product have been determined from the P2 Plan, the units cannot be changed in subsequent years, unless the P2 Plan, P2 Plan Summary and previous P2 Progress Reports have been modified.
  - Percent Change for USE - State the total progress made toward achieving each substance-specific process-level pollution prevention goal for USE identified in the P2 Plan and in the P2 Plan Summary submitted to the NJDEP. (Refer to the P2-115 for Toluene in process "THINGAMABOBS" for the variables in the following formula – page 29.)

$$\text{Percent Change for Use} = \frac{[(O / M) - (V / T)]}{(O / M)} * 100$$

- Percent Change for NPO - State the progress made toward achieving each substance-specific process-level pollution prevention goal for NPO identified in the P2 Plan and in the P2 Plan Summary submitted to the NJDEP. (Refer to the P2-115 for Toluene in process "THINGAMABOBS" for the variables in the following formula – page 29.)

$$\text{Percent Change for NPO} = \frac{[(Q / M) - (X / T)]}{(Q / M)} * 100$$

Calculations must be included in the P2 Plan and the results of the calculations must be entered on the electronic reporting form. Even if the facility has implemented no options or has set zero goals, calculations for all substances must be performed annually to determine progress on USE and NPO, and must be included in the P2 Plan.

- Pollution Prevention Techniques Used in Current Year - For each substance used within the targeted production process, select the method(s) used to achieve the USE and/or NPO reductions in the current year (e.g., 2005), by clicking on the “Select Techniques” button. If no USE or NPO reductions occurred in the current year, leave the Techniques box blank.
- Pollution Prevention Techniques Planned for Next Year - For each substance used within the targeted production process, select the method(s) that are *planned to be implemented next year* (e.g., 2006) to achieve the USE or NPO reductions stated in Section D of the facility's P2 Plan Summary, by clicking on the “Select Techniques” button. If a reduction goal of zero was stated for any substance, leave this box blank.

When Section D data entry is completed, click on the “Continue” button. This will return the Section D Targeted Process Folder. When all targeted processes are completed, click on the “Continue” button. The RPPR and P2 Plan Summary Folder will display, showing the RPPR status as “Awaiting Certification.” See the following page for the submission procedure for the RPPR.

#### **IV. SUBMITTING THIS REPORT**

*NJDEP regulations require electronic preparation and Internet submission of the RPPR. See pages i & ii at the front of these instructions for guidance on e-reporting of the RPPR!*

For electronic certification and submittal the person who is the responsible party must have his/her own myNewJersey Portal account set up (see page i), with his/her **own name** under User Name, that is, not the facility name or some other user code name. This will be the name that prints as the certification "Signature" on the RPPR. The certifying authority will need a Certification PIN which is separate and distinct from the Log On Password.

When the RPPR has been completed and is ready for certification and submittal, the certifying official must access the completed report. Once the facility Release and Pollution Prevention Report and P2 Plan Summary Folder has been accessed, the certifying official will see that the report Status is "Awaiting Certification." (If the Status is NOT "Awaiting Certification," contact the Office at the phone number listed below for assistance.) Click the "Certification and Submittal" button to get to the certification folder, select the report(s) to be certified and click "Continue."

Check the appropriate boxes for the certifying statements. Enter the Certification PIN and the Title of the certifying authority. (Note: under "Name of Certifying Party" this screen will display the User ID, but the User Name will show up on the certification "Signature" line of the report.) Click on the "Certify" button and a screen will appear stating that "The Report certification was successful." Click "Continue" to get to the RPPR and P2 Plan Summary Folder. The Status will now be "Submitted."

Use the printer icon to the left of the Report hyperlink to format the report for printing.

When the eRPPR (or in the rare case a paper version of the RPPR) is submitted, at least two (2) copies of the completed RPPR must be made (one copy for the local county lead agency and one copy for the facility file). For a paper submission, only in the case of a Trade Secret Claim or Hardship Exemption, be sure to include any pages and attachments on which additional information is reported. Any attachments necessary to the eRPPR must be forwarded to the NJDEP at the address below.

In the case of a paper submission, it is required to return the completed original RPPR to the NJDEP at the address below. Be sure to include documentation for any trade secret claims on the Trade Secret Claim Form (DEQ-119). You may obtain the DEQ-119 package from the Office of Pollution Prevention and Right to Know website at <http://www.state.nj.us/dep/opppc/figdoc.htm> or call the Office at 609-777-0518. An incomplete trade secret claim submission will invalidate the claim. The mailing address for paper submissions, and other communications, is:

State of New Jersey  
Department of Environmental Protection  
Office of Pollution Prevention and Right to Know  
Station Plaza 4, 22 S. Clinton Avenue - 3<sup>RD</sup> Floor  
P.O. Box 443  
Trenton, New Jersey 08625-0443

Send one copy of the RPPR to the County Lead Agency for the county where the facility is located (see CLA Appendix online - <http://www.state.nj.us/dep/opppc/crtk/cla2008.pdf> ).

Keep one copy of the RPPR for the facility records. The law requires that the report be made available to employees and inspectors upon request.

For additional assistance or any questions about completing the RPPR, contact the NJDEP's Office of Pollution Prevention and Right to Know at 609-777-0518.