



Waste Reduction Policy Act (WRPA)

Shelby Williams

P2 Coordinator

TCEQ Pollution Prevention & Education

Why bother with P2?

- **It's the law!**
- Reduced regulatory burden
- Economic benefits
- Protect the environment
- Public relations

WRPA Applicability

30 TAC Chapter 335 Subchapter Q **applies to:**

- All EPA Toxics Release Inventory (TRI) Form R reporters
- Hazardous waste generators
 - Large Quantity Generators (LQG)
 - Small Quantity Generators (SQG)

WRPA Applicability cont.

. . . and does **NOT** apply to:

- TRI Form A reporters who are **NOT** LQG or SQG
- Very Small Quantity Generators* (VSQG / CESQG) who **DO NOT** report TRI Form R
- Sites regulated **ONLY** by the Railroad Commission

*VSQG, previously CESQG. Although, CESQG is still what shows in CR.

WRPA Exemptions

- Sites only reporting because of remediation
- granted on a case-by-case basis
 - Must be renewed annually
 - generally done for 1-time remediation projects

WRPA Requirements - Step 1

1. Prepare 5-year Pollution Prevention (P2) Plan:

- Renew every 5 years

*Always due on January 1st

- Must be kept available on site
 - Let more than one person know where to find it

WRPA Requirements - Step 2

2. Submit Executive Summary of P2 Plan to TCEQ

- With Certificate of Completeness and Correctness
- Signed by site owner/plant manager/corporate officer
- Keep proof of submittal with your copy of the Plan.

WRPA Requirements - Step 2

- Submit the Executive Summary via email to: P2@tceq.texas.gov
-or
- ▶ Submit hard copy via mail to:
TCEQ Pollution Prevention
MC - 118
P.O. Box 13087
Austin, TX 78711-3087

WRPA Requirements - Step 3

3. Submit Annual Progress Report

***LQGs and TRI Form R reporters ONLY**

Annual Progress Report

- Due July 1, after your plan has been in place for a year
- Report year covers January 1 through December 31 of the previous calendar year
- Reports the amount of hazardous materials that were source reduced

► **Submit online through STEERS**

• **Instructions at www.P2plan.org**

STEERS

- State of TX Environmental Electronic Reporting System (STEERS)
 - Open for submission of the Annual Progress Report from **May 15 – July 1**
 - Only way to receive an electronic submission acknowledgment
 - Allows you to enter your numbers directly to the program database
 - No transcription by staff
 - Outside of the reporting period you can:
 - Access previous APR submissions
 - Edit WRPA contacts


STEERS Login

Browser address bar: <https://www3.tceq.texas.gov/steers/>

Browser tabs: Home - InOutBoard, TCEQ STEERS Login

Browser menu: File, Edit, View, Favorites, Tools, Help

Browser toolbar: Suggested Sites, WebMD - Better informati..., WebMD Infant and Child Health Tr..., Get more Add-ons, Convert, Select, Page, Safety, Tools

**THE STATE OF TEXAS ENVIRONMENTAL ELECTRONIC REPORTING SYSTEM**
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

[Questions or Comments](#)

[TCEQ Home](#)

Welcome to STEERS, the State of Texas Environmental Electronic Reporting System.

Here is what you can do online in STEERS:

e-Permits\Registration:

- >> Aggregate Production Operations Registration **NEW**
- >> Air New Source Review Registrations
- >> CAFO General Permit
- >> Municipal Solid Waste Notifications
- >> Pesticide General Permit
- >> Petroleum Storage Tank (PST) Self-Certifications
- >> Storm Water General Permits (Construction & Multi-Sector)

e-Reporting:

- >> Annual Emissions Inventory Report (AEIR)
- >> Air Emissions & Maintenance Events (AEME) Reporting
- >> Discharge Monitoring Reports (eDMR)
- >> Industrial & Hazardous Waste (IHW) NOR and Summaries
- >> Municipal Solid Waste (MSW) Quarterly Report
- >> Pollution Prevention Planning (P2PLAN) Reporting
- >> Training Roster Online Submittal (TROLS)

[See details of what you can do.](#)

This is STEERS version 5.8.

Enter STEERS:

ER Account Number: (ER + 6 digits)

Password:




I need:

- [my password](#)
- [to create a new account](#)
- [to authorize another user's account](#)

Find Out When STEERS Will Be Offline

We do our best to ensure that STEERS is online when you need it. But for upgrades, security measures, and other maintenance, we must bring STEERS or one of its modules offline. We cannot predict emergency outages, but for scheduled downtimes, see our [STEERS maintenance schedule](#).

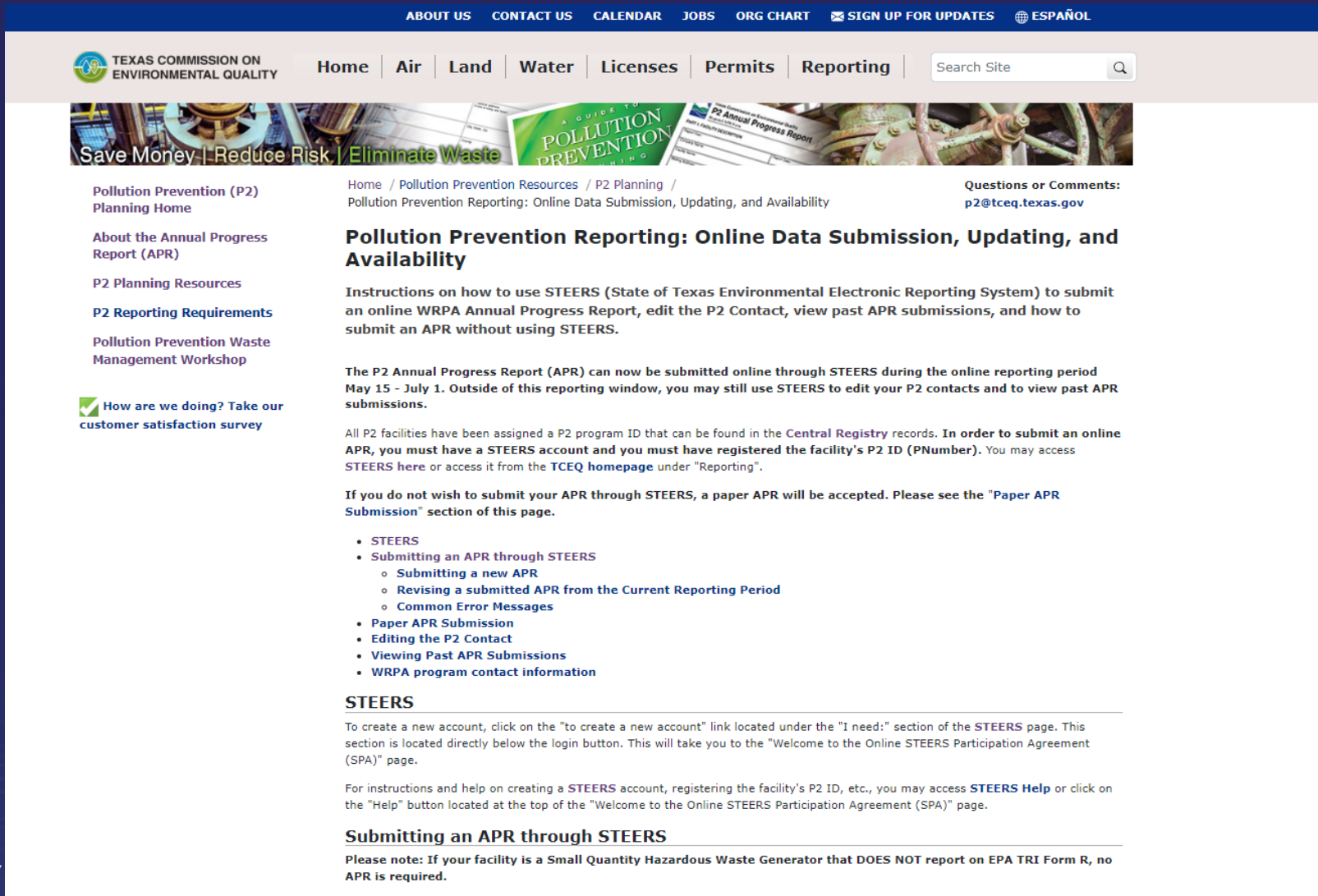
Site Help | Disclaimer | Web Policies | Accessibility | Helping Our Customers | TCEQ Homeland Security | Contact Us | Customer Survey



Last Modified 12/4/08
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STEERS Help

- Step By Step Instructions available on www.P2plan.org:



The screenshot shows the Texas Commission on Environmental Quality (TCEQ) website's STEERS Help page. The header includes navigation links: ABOUT US, CONTACT US, CALENDAR, JOBS, ORG CHART, SIGN UP FOR UPDATES, and ESPAÑOL. Below the header is a search bar and a navigation menu with links: Home, Air, Land, Water, Licenses, Permits, and Reporting. The main content area features a banner with the text "Save Money | Reduce Risk | Eliminate Waste" and a "POLLUTION PREVENTION" graphic. The left sidebar contains links: Pollution Prevention (P2) Planning Home, About the Annual Progress Report (APR), P2 Planning Resources, P2 Reporting Requirements, and Pollution Prevention Waste Management Workshop. The main content area is titled "Pollution Prevention Reporting: Online Data Submission, Updating, and Availability" and includes a "Questions or Comments: p2@tceq.texas.gov" link. The text explains that the P2 Annual Progress Report (APR) can now be submitted online through STEERS during the reporting period of May 15 to July 1. It also states that all P2 facilities have been assigned a P2 program ID that can be found in the Central Registry records. A list of links is provided for submitting an APR through STEERS, including Submitting a new APR, Revising a submitted APR from the Current Reporting Period, Common Error Messages, Paper APR Submission, Editing the P2 Contact, Viewing Past APR Submissions, and WRPA program contact information. The page also includes a section for creating a new account and a section for submitting an APR through STEERS.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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Save Money | Reduce Risk | Eliminate Waste

POLLUTION PREVENTION

P2 Annual Progress Report

Pollution Prevention (P2) Planning Home

About the Annual Progress Report (APR)

P2 Planning Resources

P2 Reporting Requirements

Pollution Prevention Waste Management Workshop

How are we doing? Take our customer satisfaction survey

Home / Pollution Prevention Resources / P2 Planning / Pollution Prevention Reporting: Online Data Submission, Updating, and Availability

Questions or Comments: p2@tceq.texas.gov

Pollution Prevention Reporting: Online Data Submission, Updating, and Availability

Instructions on how to use STEERS (State of Texas Environmental Electronic Reporting System) to submit an online WRPA Annual Progress Report, edit the P2 Contact, view past APR submissions, and how to submit an APR without using STEERS.

The P2 Annual Progress Report (APR) can now be submitted online through STEERS during the online reporting period May 15 - July 1. Outside of this reporting window, you may still use STEERS to edit your P2 contacts and to view past APR submissions.

All P2 facilities have been assigned a P2 program ID that can be found in the Central Registry records. In order to submit an online APR, you must have a STEERS account and you must have registered the facility's P2 ID (PNumber). You may access STEERS [here](#) or access it from the [TCEQ homepage](#) under "Reporting".

If you do not wish to submit your APR through STEERS, a paper APR will be accepted. Please see the "Paper APR Submission" section of this page.

- STEERS
- Submitting an APR through STEERS
 - Submitting a new APR
 - Revising a submitted APR from the Current Reporting Period
 - Common Error Messages
- Paper APR Submission
- Editing the P2 Contact
- Viewing Past APR Submissions
- WRPA program contact information

STEERS

To create a new account, click on the "to create a new account" link located under the "I need:" section of the STEERS page. This section is located directly below the login button. This will take you to the "Welcome to the Online STEERS Participation Agreement (SPA)" page.

For instructions and help on creating a STEERS account, registering the facility's P2 ID, etc., you may access [STEERS Help](#) or click on the "Help" button located at the top of the "Welcome to the Online STEERS Participation Agreement (SPA)" page.

Submitting an APR through STEERS

Please note: If your facility is a Small Quantity Hazardous Waste Generator that DOES NOT report on EPA TRI Form R, no APR is required.

APR Form



Texas Commission on Environmental Quality P2 Annual Progress Report

Required APR
Form

PART 1. FACILITY DESCRIPTION

Report Year:	Report Date:
Company Name:	
Facility Name:	
Mailing Address:	Physical Address:
Mailing City, State, Zip:	Physical City, State, Zip:
Name of Pollution Prevention Contact:	TCEQ SW Reg. #
Telephone: - - Ext	TRI ID #
Fax: - -	EPA ID #
Email (optional):	P2 Program ID (PNumber):
Primary SIC Code:	Number of Employees:
Primary NAICS:	Regulated Entity Number (RN):
First year of your current plan:	Customer Number (CN):
Does this report revise a previously submitted APR? <input type="checkbox"/> Yes <input type="checkbox"/> No	

PART 2. PROJECTED AMOUNTS FOR GOAL YEAR (FROM YOUR PLAN)

Goal Year (the fifth year of your plan): _____	Estimate Quantity	
	HW (A)	TRI (B)
1. Projected amount of HW generation or TRI releases/transfers by Goal Year	Tons	Tons
2. Source reduction anticipated over five-year period	Tons	Tons
3. % Waste Minimization by the Goal Year	%	

TCEQ-00784 (7/11)

Facility Name:

Date: _____ Page 2 of 2

Part 3: Reduction Achievement for the Report Year

Source Reduction Activities

Estimate the amount of reduction for hazardous waste generation and TRI release/transfer that your facility experienced in each category below.

	Estimate Quantity	
	HW (A) [Tons]	TRI (B) [Tons]
1. Good Operating Practices		
2. Inventory Control		
3. Spill and Leak Prevention		
4. Raw Material Modifications		
5. Process Modifications		
6. Cleaning and Degreasing		
7. Surface Preparation and Finishing		
8. Product Modification		
9. Total Source Reduction (Sum 1-8) in Tons		

Briefly describe any modifications to your plan as well as your pollution prevention projects, especially the activity you undertook to reduce waste at its source for the report year:

[illegible]

Note: Submission of waste minimization information and information about HW generated and TRI released and transferred for the previous reporting year is required by the Waste Reduction Policy Act. SQ's that are non-TRI Form R reporters meet this requirement through submission of their annual waste summary. All hazardous waste generators are required to submit an annual waste summary. Submission of this form does not substitute for submission of the annual waste summary.

TCEQ-00784 (7/11)



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ENVIRONMENTAL QUALITY

SQG/Non-TRI R

- If Small Quantity Generator & not TRI Form R
 - No Annual Progress Report
 - Items not required in P2 Plan
 - Employee awareness training (but a good idea)
 - Address release of different pollutant, or media transfer

New-Comers

- Site that becomes subject to WRPA has 90 days to put a P2 Plan in place:
 - First time TRI reporters
 - First Annual Waste Summary showing SQG or LQG
- ❖ Keep a copy on site and send a signed Executive Summary to TCEQ

Enforcement

- **Violations** of 30 TAC Chapter 335 Subchapter Q:
 - Failure to have complete P2 Plan available on site
 - Failure to submit Executive Summary of P2 plan
 - Failure to keep the Executive Summary updated
 - Failure to submit Annual Progress Report

Why bother with P2?

- It's the law! ✓
- **Reduced regulatory burden**
- Economic benefits
- Protect the environment
- Public relations

Reduce Regulation

Hazardous waste generation. . . .

- LQG ($> 2,200$ lbs./month) = 88 requirements
- SQG (220 to 2,200 lbs./month) = 74 requirements
- **VSQG (≤ 220 lbs./month) = ONLY 4**

*TCEQ definitions for LQG, SQG, and VSQG now match the new IHW generator rule definitions in 30 TAC §335.1.

What is Pollution Prevention (P2)?

- A method of analyzing and modifying processes and inputs in an effort to minimize non-product outputs.
- Avoiding the disposal or release of substances into the environment by means of source reduction and waste minimization. (RG-409)

SOURCE REDUCTION

30 TAC §335.471(13)

Occurs before a waste has been “generated” or created
(prior to recycling)

Examples:

- Equipment and technology modifications
- Procedural changes
 - Batch scheduling
- Reformulation or redesign of products
 - Raw material substitutions

WASTE MINIMIZATION

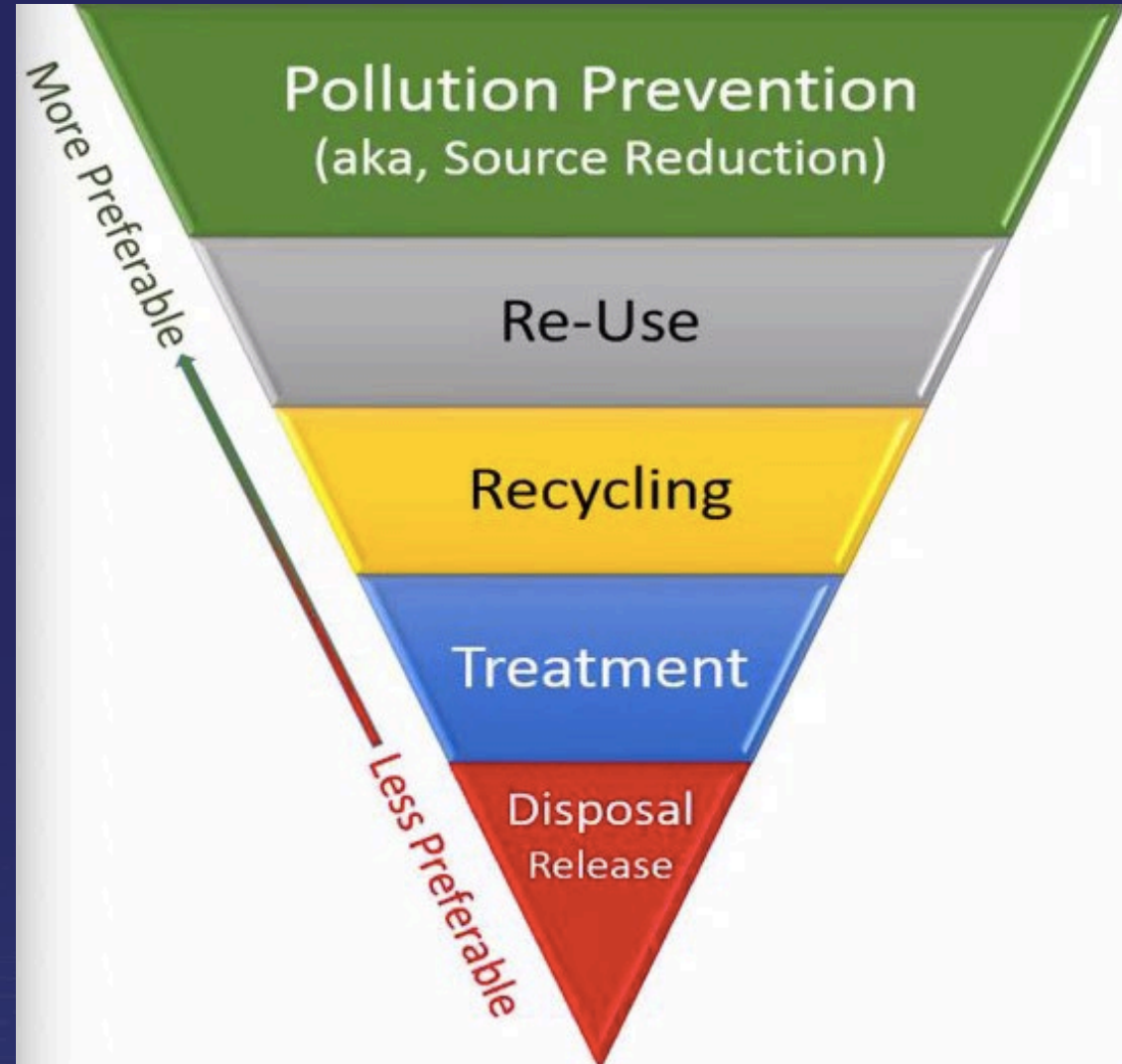
30 TAC §335.471(16)

Occurs after a waste has been “generated” or created

Examples include:

- Reuse
- Recycle
- Neutralization
- Reclassification

Waste Hierarchy



P2 Planning Process



Better Alternatives?

Schick Razor Blades

- Facility manufactures steel blades and tools for everything from razors to medical blades
- Used TCE (Trichloroethylene) to clean the blades before shipping
- Using approximately 1700 tons of TCE per year
- Examined the process to look for alternatives

Better Alternatives?

Schick Razor Blades

- Replaced TCE baths with alcohol-based cleaners:
 - Eliminated the use of TCE in the process
 - Removed all TCE from the property
 - Yearly cost reductions of \$250,000
 - Reduce energy (no more distillation)
 - Reduced material costs
 - Reduced hazardous waste disposal costs
 - Reduced the regulatory risk!

Why bother with P2?

- It's the law! ✓
- Reduced regulatory burden ✓
- **Economic benefits**
- Protect the environment
- Public relations

Always Measure Results

- The Tale of the Missing Reductions:
 - Large chemical manufacture that had been subject to P2 Planning since the beginning.
 - Had been implementing P2 projects slowly over the past 20 years: updated equipment, modified processes
 - Reported small reductions
 - Continued disposing of waste as hazardous based on original process knowledge

Always Measure Results

- The Tale of the Missing Reductions:
 - New environmental personnel reviewed the site history
 - New projects were started
 - Found markets for waste streams to be sold as secondary products
 - Resolved some long-standing issues with water treatment equipment
 - After all of the process modifications, no one thought to re-characterize the waste streams

Always Measure Results

- Reported in 2016:
 - Reclassified a waste stream as a product with a buyer
 - Repaired existing equipment
 - Re-characterized the remaining waste streams

Reported a 4.5 MILLION TON REDUCTION IN ONE YEAR!!

Repeated the work at a sister facility

Reported a 49 THOUSAND TON REDUCTION IN ONE YEAR!!

Why bother with P2?

- It's the law! ✓
- Reduced regulatory burden ✓
- Economic benefits ✓
- **Protect the environment**
- Public relations

WRPA Results

Reductions since 1999*:

- Over 22.6 million tons of Hazardous Waste
- Over 7 million tons of TRI Chemicals

*Results taken from the Annual Progress Reports from 1999-2023

Why bother with P2?

- It's the law! ✓
- Reduced regulatory burden ✓
- Economic benefits ✓
- Protect the environment ✓
- **Public relations**

It's Not Just Advertising Anymore

- The Modern World – Increased Awareness
 - 24-hour news coverage
 - International Competition
 - Consumer Awareness and Opinion
 - Data Mining/Research Companies
 - Social media

The Power of Social Media

- *In One Tweet, Kylie Jenner Wiped Out \$1.3 Billion of Snap's Market Value* – Bloomberg Report, February 2018
- “If they can be the first to react to a news event, then maybe they can get an edge over their competition.” – *How investors are using social media to make money*, CNBC, June 2016
- “The importance of social media can't be overstated.” – *How the youngest generation is redefining work*, BBC, February 2018

Resources



P2Plan.org

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p2@tceq.texas.gov

Pollution Prevention (P2) Planning

A portal to resources available for the Waste Reduction Policy Act and pollution prevention planning.



The State of Texas Pollution Prevention Program

[Annual Progress Report](#) | [Online P2 Annual Progress Reporting \(STEERS\)](#)

[Example P2 Plans](#) | [Pollution Prevention Planning Guide \(RG-409\)](#)

Documents on this page are in various file formats (Help [downloading files.](#))



Watch on  YouTube

[WRPA](#) [Hot Topics](#) [Resources](#)

P2Plan.org



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[Pollution Prevention \(P2\) Planning Home](#)

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[Pollution Prevention Waste Management Workshop](#)

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P2 Planning Resources

Links to available resources for P2 Planning efforts.

The links below will take you off the TCEQ Web site. This collection is provided solely as a courtesy to agency customers and comprises resources that agency staff or customers have found to contain useful information. Because the TCEQ has no control over the posting of material to Web sites on this list, the agency cannot take responsibility for the validity of their contents.

>> Questions or Comments:
p2@tceq.texas.gov



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>> Questions or Comments:
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Example Pollution Prevention Plans

Links to sector-specific examples of pollution prevention plans.

Under the Waste Reduction Policy Act (WRPA), facilities are required to submit a five-year pollution prevention plan. However, WRPA does not require that these plans be in any specific format. Therefore, this page was created to provide facilities with examples of various types of formats that can be used when developing a pollution prevention plan. These plans were submitted by actual facilities and were selected by the Texas Commission on Environmental Quality (TCEQ) because they:

- are well organized,
- are easy to read,
- identified good source reduction and waste minimization options, and
- completely and sufficiently include all required elements.

The TCEQ appreciates the careful thought and hard work by the companies which produced these plans. We especially thank them for their willingness to allow the plans to be posted here.



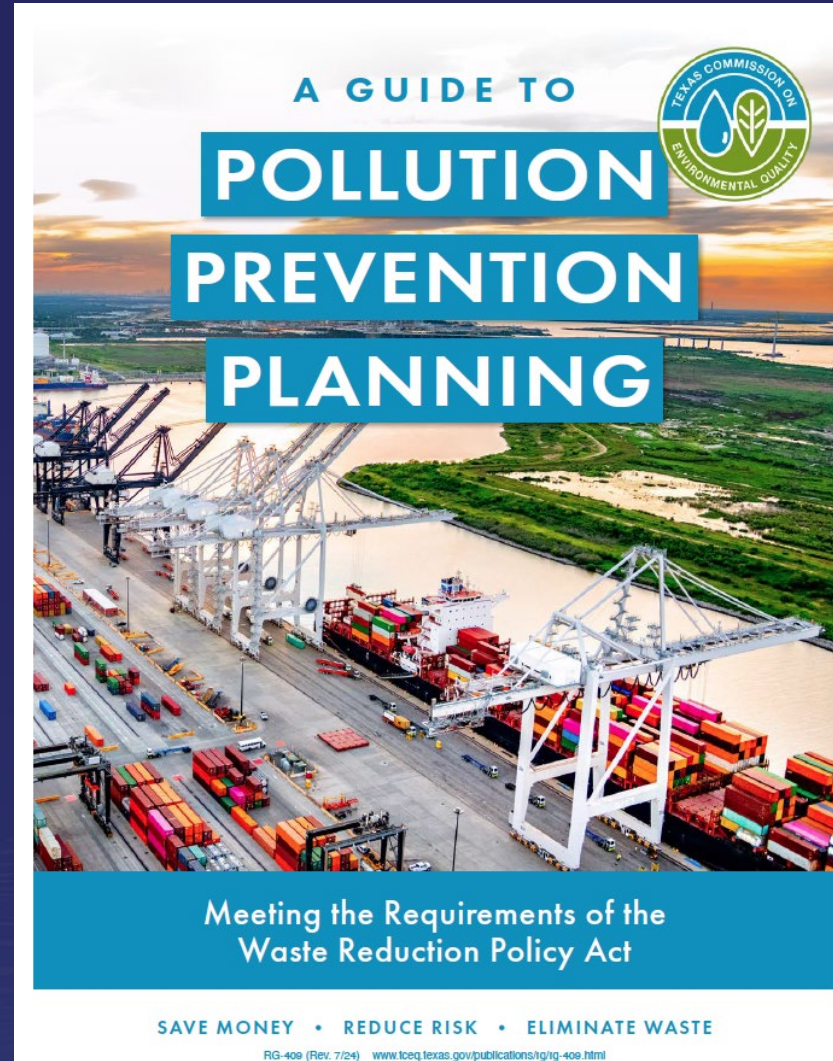
How are we doing? Take
our customer satisfaction
survey



TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

P2 Planning Guide (RG-409)

New and Improved!



EPA Resources

- Case Studies
- Articles
- Fact Sheets
- Videos
- Webinars

P2 Resources Search

This resource contains a collection of case studies, webinars, tools and articles about P2 solutions, practices, and technologies. Some of the resources listed are grantee work products and may not have been formally reviewed by EPA, and may not reflect the views and policies of EPA. The EPA does not endorse trade names or recommend the use of commercial products mentioned in these documents.

Search for P2 resources by keywords, sector, or processes. To search by P2 National Emphasis Area (NEA), select the "Sector" search and the NEA.



Keywords



Sector



Processes

Enter Keywords

☐

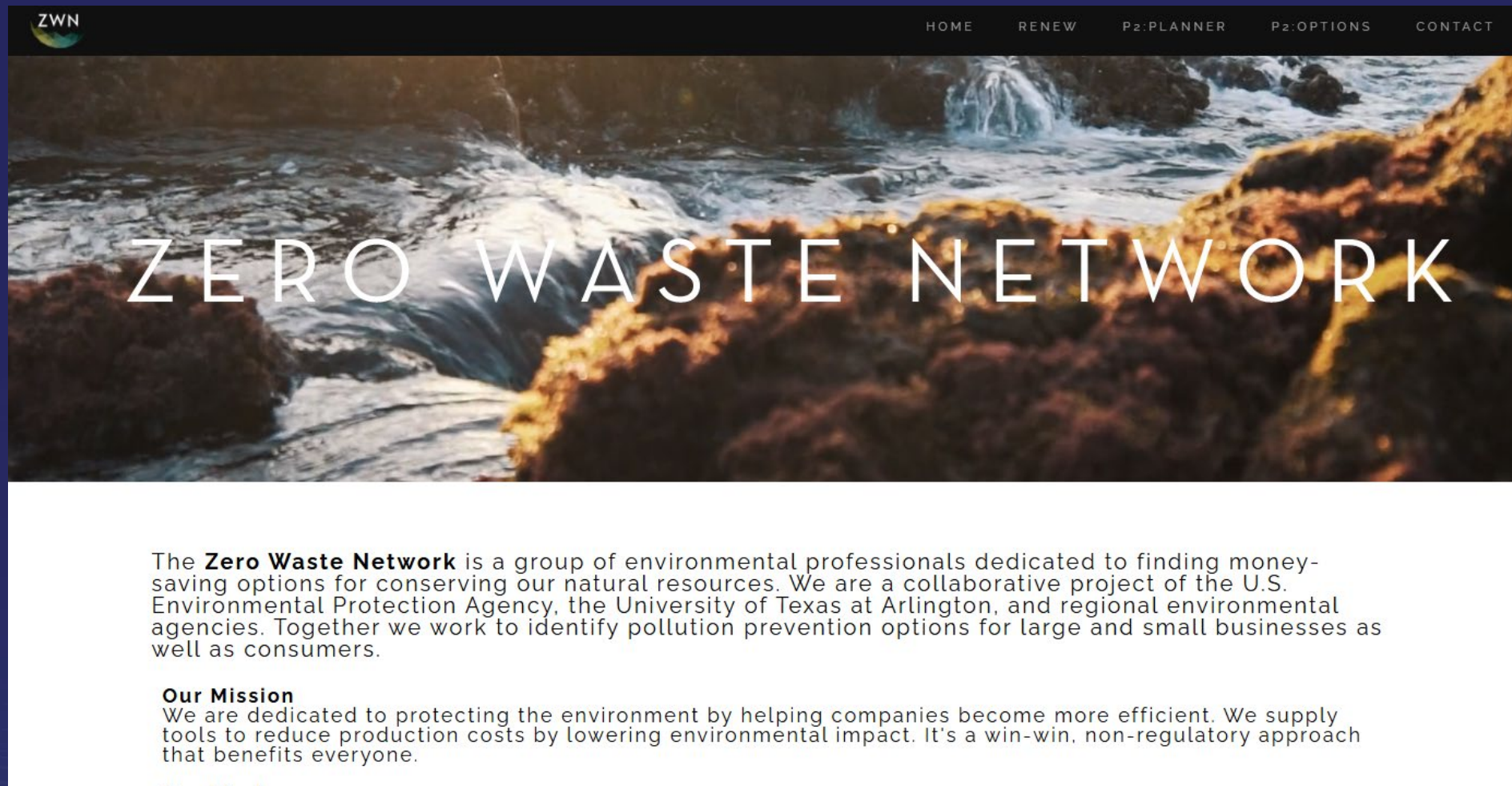
Show Case Studies Only

Reset All

Search



UT Arlington: Zero Waste Network



Zero Waste Network

- Automotive
- Cleaning
- Degreasing
- Fleets
- Hospitals
- Inventory
- Offices
- Oil and Gas
- Tank Washing

POLLUTION PREVENTION OPTIONS

Following are a set of pollution prevention options (Best Management Practices) that can be used to save money by reducing waste. Many of the options you will find are submitted by people in the private sector who have found solutions to a variety of problems.

REVIEWED OPTIONS FOR ACTIVITIES

The following activities have options that have been reviewed by specialists in the pollution prevention field. Options may include unreviewed options submitted as part of the P2 Planner project.

- Automotive - Dealership Maintenance
- Automotive Services
- C-22 Column
- Chemical - Agriculture
- Chemical - Blending
- Chemical - Distribution
- Chemical Manufacturing - Heat Exchangers
- Chemical Manufacturing - Storage Tanks
- Chemical Manufacturing reboiler
- Cleaning and Degreasing Operations
- Coating - Aerosol Can Management
- Coating - Employee Training
- Coating-Clean Up
- Coating-General
- Coating-Surface Preparation
- Degreaser
- Dentistry

P2 Contacts

Shelby Williams, P2 Program Coordinator

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Shelby.williams@tceq.texas.gov

Juliana Sampson, P2/RENEW

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Juliana.sampson@tceq.texas.gov



Resource Exchange Network For Eliminating Waste (RENEW)

Juliana Sampson

Pollution Prevention and Recycling Specialist

Outline

- What is RENEW?
- Background
- Outcomes
- Data analysis
- How to use RENEW
- Email updates

What is RENEW?

- FREE materials-exchange network
- Used to sell surplus waste materials
- Option to reduce waste



Background

- Established in 1987 by the Texas Legislature
- Physical catalog of material listings
- Partnership between TCEQ and Zero Waste Network in 2007
- RENEW website launched

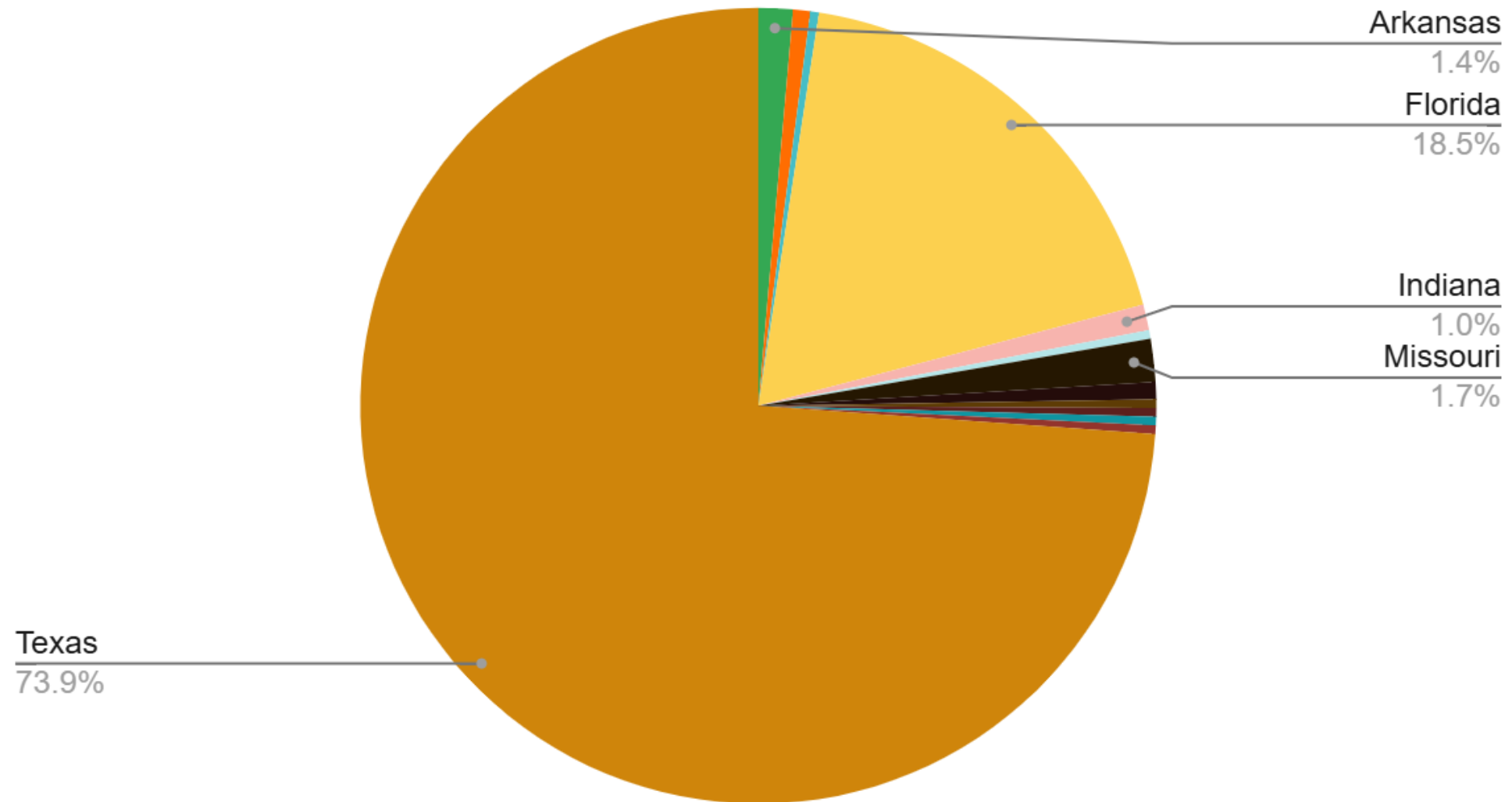


Outcomes

Since 1987, more than 500 exchanges have

1. Diverted more than **1 billion pounds** of material
2. Saved users more than **\$27 million** in disposal costs
3. Helped users earn over **\$15 million** from sales

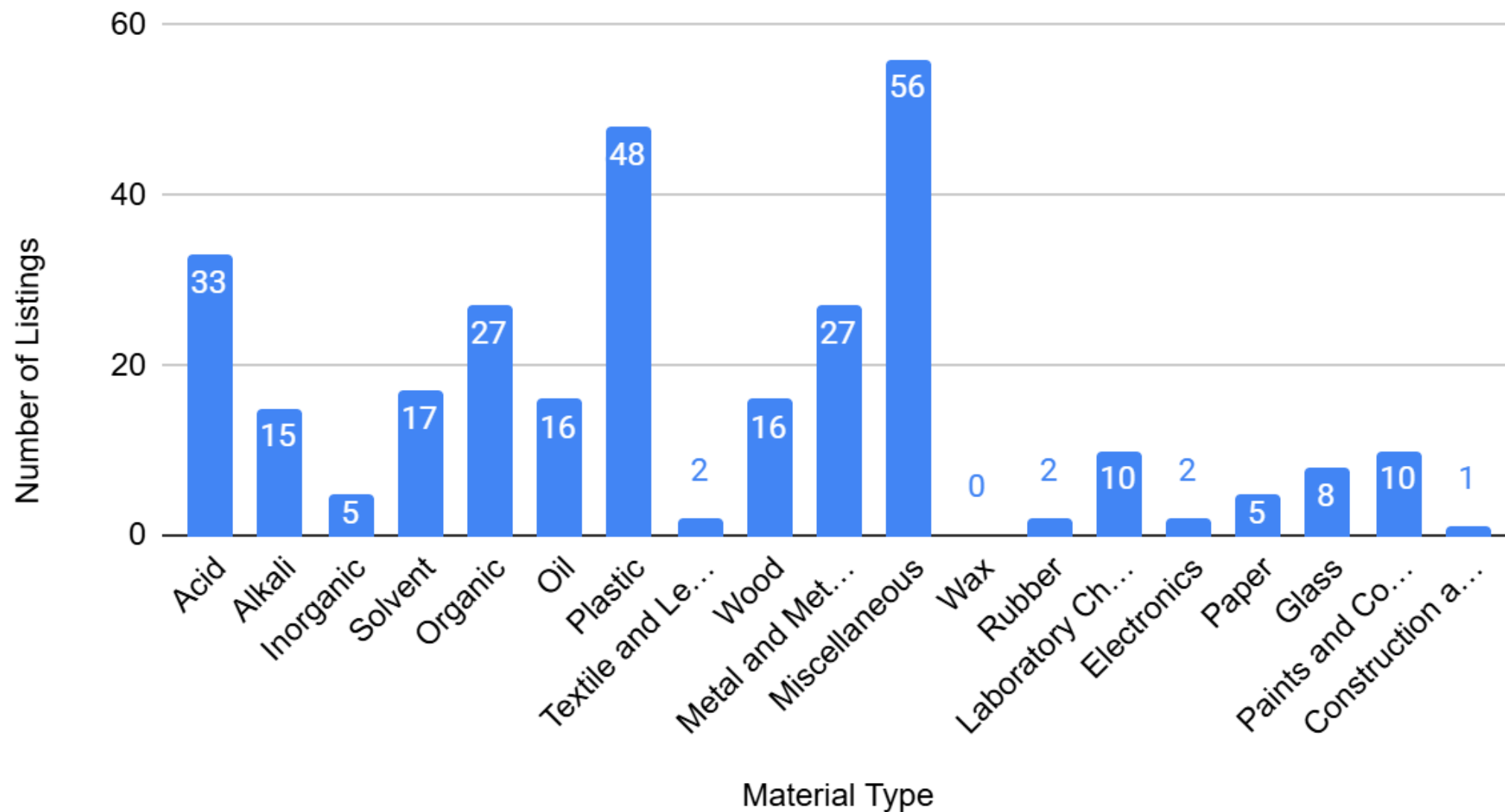
Listings by State (April 2025)



Texas Subscribers

City	Number of Subscribers
Houston	193
Austin	81
Dallas	49
Fort Worth	45
Pasadena	43
San Antonio	32

Number of Listings per Category (April 2025)

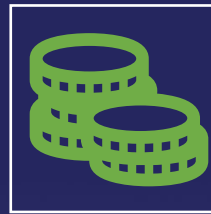


Benefits of RENEW



Environmental

- Conserve natural resources
- Reduce waste handled, processed and disposed



Economic

- Reduce disposal cost
- Potential profit



Social

- Show environmental consciousness

How to Use RENEW – create a listing

1. Go to renewtx.net
2. Create an account
3. Add wanted or available listing, edit listings, add successful exchange
4. Option for confidentiality

How to Use RENEW – material listings

- **Materials Available** – find materials offered
- **Materials Wanted** – search for materials others want



MATERIALS
AVAILABLE

MATERIALS
WANTED

ABOUT

LOG IN

SUCCESS
STORIES

A large, messy pile of discarded books, papers, and documents, illustrating the need for a resource exchange.

RENEW
RESOURCE EXCHANGE

How to Use RENEW - Subcategories






Acid	Alkali	Inorganic	Solvent	Organic	Oil
Plastic	Textile and leather	Wood	Metal and metal sludge	Miscellaneous	Wax
Rubber	Laboratory chemicals	Electronics	Glass	Paints and coatings	Construction and demolition



Subcategories



MATERIAL CATEGORIES

MATERIAL TYPE	DEFINITION	EXAMPLE
 Acid	Chemical substance having pH less than 7. Neutralizes alkalis and dissolves some metals.	Ferric Chloride, Sulfuric Acid
 Alkali	Chemical substance having pH greater than 7. Reacts with acids to produce salt and water.	Potassium Hydroxide, Sodium Hydroxide Solution
 Construction and Demolition	Materials used in construction and demolition.	Sand Blasting Grit, Drywall
 Electronics	Discarded electrical or electronic devices.	Computers and monitors
 Glass	Hard, brittle substance, typically transparent or translucent, use to make windows, drinking containers and other articles.	Crushed Glass, Glass Jars



Email Updates

Go to the RENEW page on TCEQ to [subscribe](#) for updates on material listings

Sign Up for Email Updates

Get updates on new material listings. Visit our subscription page and select "Resource Exchange Network for Eliminating Waste (RENEW)" under the "Waste Management, Reduction, & Recycling" category.

Contact Information

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QUESTIONS?

