

GUIDANCE FOR DEVELOPING ARMY POLLUTION PREVENTION PLANS

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FOREWORD

The Purpose of this Guidance

This guidance identifies and outlines the elements necessary to develop an installation-level pollution prevention plan that addresses the requirements of P2-related laws, executive orders, and DoD measures of merit. Most Army installations have already independently developed pollution prevention plans using their own format. In recognition of these efforts, this guidance is not intended to serve as a required format but, rather, is intended to serve as a reference that MACOM and installation environmental personnel can use when reviewing and updating their plans. However, to ensure that the plan addresses all regulatory requirements, it is essential to incorporate all of the elements of this guidance regardless of the plan's format.

Sample Text Provided

A companion document to this guidance provides sample text to more clearly convey the type of information that a pollution prevention plan should contain. Note that this sample text is not intended to be used verbatim but, rather, is intended to serve as a guide that installation personnel can use to document their installation's individual policies, goals, and progress. This companion document is titled "Sample Text for Army Pollution Prevention Plans".

Updating the Plan – An On-Going Process

One purpose of the pollution prevention plan is to provide information about the installation's on-going pollution prevention efforts. Therefore, it is important that installation personnel continuously update the plan to identify newly identified P2 projects and to note any status changes of established projects. To facilitate continuous updating, personnel are encouraged to insert such data from already-existing sources when possible. For example, some installations may use ready-made worksheets to evaluate potential pollution prevention initiatives. Rather than transcribing the information from these sheets to the P2 plan, personnel could insert a copy of the worksheet into the proper place. If, for instance, environmental personnel completed a worksheet to evaluate antifreeze recycling, they could insert the worksheet as a potential initiative under section 5.5 of the plan. Likewise, as a project's implementation status changes, personnel may simply make handwritten notations to reflect the change.

The intent is to make it as easy as possible for installation personnel to use this plan as a tool to help document, track, and manage its pollution prevention efforts. However, to ensure that the plan remains organized and electronically portable, the installation should consider incorporating such inserts and handwritten notations into a master electronic copy on a periodic basis (perhaps annually or bi-annually).

Summary of Pollution Prevention Goals

Media	Goal	Source of Goal	Baseline Year	Target Year
Hazardous Waste	Continuous annual reduction in disposal	Proposed DoD MoM	NA	NA
Solid Waste	40% diversion	DoD MoM	NA	Dec 2005
Air Emissions	Continuous annual reduction in emissions	DoD MoM	NA	NA
Water Use	Continuous annual reduction in potable water use	---	NA	NA
Wastewater Generation	Continuous annual reduction in wastewater generation	---	NA	NA
TRI Releases	40% Reduction	EO 13148	2001	Dec 2006
EPA Priority Chemicals	50% Reduction in chemical use	EO 13148	2002	Dec 2006
ODSs	Eliminate Class I ODSs from inventory	Memorandum ASA IL&E	NA	Dec 2003
Vehicle Fuel	Increase fleet fuel efficiency by 3 miles per gallon	EO 13149	1999	Dec 2005
	Reduce vehicle petroleum consumption by 20%	EO 13149	1999	Dec 2005
	Ensure that alternative fuels account for 50% of fuels used in dual-fuel vehicles	EO 13149	NA	2005
	Ensure that 75% of vehicles procured in the target year and beyond are alternative fuel vehicles	EO 13149	NA	1999
Energy	Reduce facility energy consumption by 30%	EO 13123	1985	2005
	Reduce facility energy consumption by 35%	EO 13123	1985	2010
Affirmative Procurement	Train procurement officers and integrate AP into developing plans, work statements, and specifications	EO 13148	NA	NA

PROJECT SUMMARY TABLE

The summary data here ties directly to the more detailed information about the projects which the plan provides in subsequent chapters (i.e. chapters 5-14). This table is intended to serve as a quick reference that installation personnel can use to keep track of the status of its pollution prevention projects across all media area. As a result, it is important to update it as the status of existing projects changes and as new projects are identified.

Project Name	Targeted Pollution Source	Implementation Status and Date	Funding Source	Compliance Thru P2?	P2 Plan Section

Project Name. Identify the name of the project. Use the same project names as in the current and potential P2 initiative sections of chapters 5-14.

Targeted Pollution Source. Identify the source of pollution that this initiative is intended to reduce. This may be as specific (e.g. used antifreeze, Chlorine TRI releases, PM10, etc.) or as general (e.g. solid waste generation, expired hazardous materials, boiler emissions) as required.

Implementation Status. Provide the status of the project. Use the same categories as described in section 5.5.1 of this guidance (requires further investigation, delayed indefinitely, pursuing funding, implementation in-progress, or fully implemented). For the date, use the date that the project was fully implemented or is expected to be fully implemented. Note that projects that have been rejected for implementation do not need to be included here

Funding Source. Provide the source (or expected source) for funding this initiative (e.g. EPR, base operations fund, etc.) If the funding source is through EPR, include the EPR project number as well.

Compliance Through P2. Use a “Y” to indicate if implementing this project will help reduce the installation’s compliance burden. Refer to Chapter 4 for more information.

P2 Plan Section. Indicate the page or section number where a full description of this project can be found in the plan (e.g. Section 5.5.1).

CHAPTER 1

INTRODUCTION

This chapter provides a brief introduction to the P2 plan, the installation, and the concept of pollution prevention.

1.1 STATEMENT OF PURPOSE

Briefly describe the scope and purpose of the P2 plan. If the installation is currently implementing (or pursuing implementation of) an Environmental Management System (EMS), then use this section to also indicate how the plan ties into the EMS by identifying aspects and impacts and by identifying and prioritizing areas for improvement (i.e. pollution reduction).

1.2 INSTALLATION LOCATION AND MISSION

Describe where the installation is located and its main mission(s)

1.3 DEFINITION OF POLLUTION PREVENTION

Provide a definition of pollution prevention to include its multimedia approach. A suggested definition is that which is included in the Environmental Program Requirements (EPR) guidance.

This guidance suggests using the EPR definition in order to maintain a consistent Army-wide definition of pollution prevention. Note however, that a key goal of this plan is to address all pollution prevention initiatives at the installation. As a result, it is also important to include prevention-based efforts that would be implemented and funded by any proponent on the installation, not just the environmental program. It is equally important to include efforts which are not limited strictly to the prevention pillar. Such efforts would include Compliance through P2 initiatives which are funded under the Compliance MDEP VENC.

1.4 BENEFITS OF POLLUTION PREVENTION

Discuss the general benefits of implementing pollution prevention initiatives.

CHAPTER 2

POLLUTION PREVENTION REGULATORY BACKGROUND

This section serves as a quick reference to the major laws, executive orders, and DOD policy statements pertaining to pollution prevention. Due to the wide-reaching, multi-media nature of pollution prevention and frequent changes to laws and regulations, the list is not intended to be all-inclusive. Rather, it is meant to touch upon the key regulations that affect how an installation manages its pollution prevention program. For each law or regulation below, the P2 plan should provide a brief description and identify its major requirements. The sample text document provides descriptions for all regulations below except for those that are state-specific.

2.1 FEDERAL LEGISLATION

- 2.1.1 Resource Conservation and Recovery Act (RCRA) of 1976.**
- 2.1.2 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980.**
- 2.1.3 Hazardous and Solid Waste Amendments (HSWA) of 1984.**
- 2.1.4 Pollution Prevention Act of 1990.**

2.2 STATE P2 LEGISLATION

2.3 PRESIDENTIAL EXECUTIVE ORDERS

- 2.3.1 Executive Order 13101, "Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition," September 1998.**
- 2.3.2 Executive Order 13123, "Greening the Government Through Efficient Energy Management", June 1999.**
- 2.3.3 Executive Order 13148, "Greening the Government Through Leadership in Environmental Management," April 2000.**
- 2.3.4 Executive Order 13149, "Greening the Government Through Federal Fleet and Transportation Efficiency," April 2000.**

2.4 DEPARTMENT OF DEFENSE (DOD) DIRECTIVES AND INSTRUCTIONS

- 2.4.1 DOD Instruction 4715.4, "Pollution Prevention," June 1996.**
- 2.4.2 DOD Memorandum, "New DOD P2 Measure of Merit," May 1998.**
- 2.4.3 DA Office of the Assistant Secretary for Installations, Logistics, and Environment Memorandum, "Ozone-Depleting Chemicals (ODC) at Army Installations," 13 Feb 1996.**

CHAPTER 3

INSTALLATION POLLUTION PREVENTION PROGRAM

This section describes the key elements of the installation's pollution prevention program. Is not meant to provide many details about these elements. Instead, the purpose of this section is to provide descriptions of the approach that the installation takes toward addressing them. For example, under heading 3.6, the plan should address the criteria used to establish its P2 goals rather than to identify the goals themselves. Note that more detailed, technical information about the installation's P2 program will appear in subsequent chapters of the plan.

3.1 POLICY

Provide a statement describing the installation's policy on pollution prevention.

3.2 POLLUTION PREVENTION MANAGEMENT STRUCTURE

Identify offices and/or personnel positions that have pollution prevention management responsibilities and describe what those responsibilities are.

3.3 BASELINE DEVELOPMENT

Describe how the installation developed it's various pollution prevention baselines.

3.4 OPPORTUNITY ASSESSMENTS

Explain how opportunity assessments are used to identify possible p2 initiatives and to make decisions regarding their implementation.

3.5 POLLUTION PREVENTION GOALS

Describe how the installation established its pollution prevention goals.

3.6 IMPLEMENTATION AND EVALUATION

Describe the methods and tools that the installation uses to initiate, track and document its pollution prevention projects. If applicable, use this section to highlight how the P2 program is integrated into an environmental management system (EMS).

3.7 REPORTING REQUIREMENTS

Identify the various P2-related environmental reports that the installation develops and submits (e.g. hazardous waste biennial report, solid waste annual report, etc.).

3.8 P2 PROGRAM FUNDING

Identify any sources of funding for implementing P2 projects at the installation

CHAPTER 4 COMPLIANCE THROUGH POLLUTION PREVENTION

4.1 DESCRIPTION OF COMPLIANCE THROUGH P2

Briefly describe the concept and benefits of compliance through P2. Describe how compliance benefits can be derived through two approaches: the reduction of compliance sites and the reduction of compliance thresholds. Note that the sample text companion document (mentioned in the forward) provides an example that illustrates these approaches.

Compliance Sites A compliance site is a facility or process that falls under environmental regulation. A single area may have multiple compliance sites associated with it. For example, an industrial process may have a wastewater discharge point, permitted air emission sources, and a hazardous waste storage area. Some examples of compliance sites include permitted air emission sources, hazardous waste storage areas, regulated storage tanks, landfills, OB/OD areas, etc.

Compliance Thresholds Compliance thresholds are quantitative limits that trigger environmental compliance requirements once they are exceeded. An examples of a compliance threshold includes the waste generation limits for determining hazardous waste generator status (greater than 1,000 Kg/mo is large quantity, less than 1,000 but greater than 100 kg/mo is small quantity, and less than 100 Kg/mo is conditionally exempt small quantity). Another example is the limit for TRI reporting. Facilities that use more than 10,000 lbs of a TRI chemical in a year must include that chemical in its TRI Form R report.

4.2 COMPLIANCE SITES

4.2.1 Hazardous Waste Storage and/or Treatment Areas

Description of Installation Hazardous Waste Storage Areas

Identify the types and quantity of hazardous waste storage areas on post. Include Part B permitted facilities, 90-day storage sites, and satellite accumulation sites.

Current Initiatives to Reduce the number of Areas

List all of the P2 initiatives identified in Sections 5.4 and 5.5 that have lead or could lead to a reduction of the number of hazardous waste storage areas on the installation.

Provide a brief description of how the initiative has lowered or could lower this number.

4.2.2 Through 4.2.X Address Other Compliance Sites

Follow guidance for section 4.2.1 above to address any other applicable compliance sites such as:

Air Emission Sources (boilers, painting operations, etc)
Solid Waste Facilities (landfills, sludge land application sites, etc.)
Under Ground Storage Tanks
Waste Water Sites (NPDES outfalls, treatment and pre-treatment plants, sludge application sites, oil/water separators, wash racks, etc.)
Storm Water Outfalls
Drinking Water Sites (wells, surface reservoirs, treatment systems, etc.)
Pesticide Application Sites
Processes that use TRI and EPA Priority Chemicals

4.3 COMPLIANCE THRESHOLDS

4.3.1 Hazardous Waste Generation

Threshold Status. Describe the installation's current hazardous waste generator status and indicate the reduction required to go below that threshold.

Initiatives to Reduce Generation to Below These Thresholds. List all of the P2 initiatives identified in Section 5.4 and 5.5 that have lead or could lead to a reduction in the overall amount of hazardous waste that the installation generates.

4.3.2 Through 4.3.X Address Other Compliance Thresholds

Follow guidance for section 4.3.1 above to address any other applicable compliance thresholds associated with requirements such as:

TRI Form R Reporting
EPA Priority Chemical Use
Risk Management Plan Development
Title V Permitting

CHAPTER 5 HAZARDOUS AND INDUSTRIAL WASTE

This chapter discusses the various aspects of the installation's hazardous/industrial waste reduction goals and efforts. It is expected to be a fluid section that personnel constantly update as they identify, evaluate, and implement new P2 initiatives.

Note that for the purposes of this plan, hazardous wastes include all wastes that fall under an EPA hazardous waste code and that require a hazardous waste manifest for disposal. Industrial wastes represent wastes that are not always considered hazardous under RCRA but must be managed separately from municipal solid wastes. Examples might include used antifreeze, used batteries, used oil, etc. This guidance address hazardous and industrial wastes under a single chapter since many installations manage these two waste streams together. In addition, many non-hazardous industrial wastes have the potential to become hazardous under certain regulatory or physical conditions.

5.1 GOALS

Identify the installation's goals that target hazardous/industrial waste reduction. At a minimum, these goals should be based on any Executive Order requirements and DoD Measures of Merit.

5.2 BASELINES AND PROGRESS

Provide the quantity of hazardous and industrial waste generated during the baseline year and for each subsequent year. Also, identify the target reduction amount based on the above goals. Note that because hazardous waste is regulated differently, it is important to separate the disposal totals for hazardous waste and for industrial waste.

5.3 MAJOR WASTE GENERATING ACTIVITIES

Identify each of the major units/activities at the installation that generate hazardous and/or industrial waste. Provide a brief description of the activity, identify its location, and list the types of wastes that it generates.

5.4 CURRENT P2 INITIATIVES

Document any pollution prevention initiative that the installation is currently implementing (or has implemented in the past). In addition to identifying when the initiative was first implemented, provide a brief description of the initiative and identify any environmental and economic benefits. Continuously update this section to include new initiatives as they become implemented.

5.5 POTENTIAL P2 INITIATIVES

Continuously update this section to include potential P2 opportunities as the installation identifies them. This section should describe each P2 opportunity; evaluate it with regards to technical, environmental, and economic feasibility; and identify its implementation status. For **EACH** potential initiative, include the following:

5.5.1 Potential Initiative A

Description. Convey how the opportunity could reduce pollution and where it would be applied.

Technical Evaluation. Describe how the process would change by implementing the initiative. Also identify any logistical implementation requirements (e.g. will the initiative require worker training, a new electrical hook-up, modified plumbing, etc.)

Environmental Evaluation. Identify the environmental benefits associated with the initiative to include pollution reduction, raw material reduction, decreased personnel exposure and/or decreased compliance requirements. If these benefits are quantifiable, provide an estimate as to the annual amount of pollution reduction that implementing the initiative would provide.

Economic Evaluation. Estimate each of the following:

Implementation Costs. The costs associated with getting the initiative put into place (equipment purchase and installation, worker training, etc.).

Recurring Costs. The annual costs required to sustain the initiative (maintenance, labor, operation, etc.)

Recurring Cost Savings. The annual costs savings that the initiative will yield (reduced material purchases, reduced disposal fees, reduced labor, etc.).

Payback Period. Calculate the payback period as follows. Note that for an economic benefit, the cost savings must be greater than the costs.

$$\frac{\text{Implementation Costs (\$)}}{\text{Recurring Cost Savings (\$/yr) - Recurring Costs (\$/yr)}} = \text{Payback Period in years}$$

Implementation Status. Describe where the installation stands with regards to implementing this initiative. Consider the following categories:

Not Selected for Implementation. Provide a reason for not pursuing the initiative (not economical, not technically feasible, etc.)

Requires Further Investigation. Describe the aspects of the initiative that require additional research before deciding whether it can be implemented.

Delayed Indefinitely. Use this category for an initiative that seems promising but that cannot be easily implemented at the present time. As an example, a possible reason for this could be waiting for a new technology to become commercially available.

Pursuing Funding. Use this category for an initiative that the installation plans to implement once it can secure funding. Describe how the installation is pursuing funding (e.g. EPR); identify when and if funding is expected; and provide an estimated implementation schedule.

Implementation In Progress. If the initiative is in the process of being implemented, describe its current status and identify when it is expected to be fully implemented

Fully Implemented. When and if the initiative becomes fully implemented, move the project's information to the Current Initiatives Section above (5.4)

5.5.2 Potential Initiative B

Description

Technical Evaluation

Environmental Evaluation

Economic Evaluation

Implementation Costs

Recurring Costs

Recurring Cost Savings

Payback Period

Implementation Status

PLEASE NOTE: The content of Chapters 6-14 closely mirrors that of Chapter 5. Therefore, to avoid redundancy, the sub-headings of each of the following chapters have not been further described except where necessary to provide further clarification.

CHAPTER 6 SOLID WASTE

- 6.1 GOALS**
- 6.2 BASELINES AND PROGRESS**
- 6.3 MAJOR SOLID WASTE STREAMS**
 - 6.3.1 Municipal Solid Waste**
 - 6.3.2 Recyclable Wastes**
 - 6.3.3 Bulk Metals**
 - 6.3.4 Yard Wastes**
 - 6.3.5 Construction and Demolition Debris**
- 6.4 CURRENT P2 INITIATIVES**
- 6.5 POTENTIAL P2 INITIATIVES**

CHAPTER 7 AIR EMISSIONS

- 7.1 GOALS**
- 7.2 BASELINE AND PROGRESS**
- 7.3 MAJOR AIR EMISSION SOURCES**

Discuss each of the installation's major air emissions sources. Examples include boilers, generators, surface coating operations, degreasing operations, painting, welding operations, fuel handling operations, etc. For each source, provide a brief description and list the types of air pollutants that it generates. This section should not provide very detailed descriptions since in-depth information can be found in the installation's air emissions inventory.
- 7.4 CURRENT P2 INITIATIVES**
- 7.5 POTENTIAL P2 INITIATIVES**

CHAPTER 8 WATER AND WASTEWATER

- 8.1 CONSERVATION/REDUCTION GOALS**
- 8.2 BASELINES AND PROGRESS**
- 8.3 CURRENT POLLUTION PREVENTION INITIATIVES**
- 8.4 POTENTIAL POLLUTION PREVENTION INITIATIVES**

CHAPTER 9 TRI FORM R CHEMICAL RELEASES

- 9.1 REDUCTION GOALS**
- 9.2 BASELINE AND PROGRESS**
- 9.3 DESCRIPTION OF TRI FORM R RELEASES**
For each release reported on the TRI Form R, provide a description of the installation activity(s) that caused the release
- 9.4 CURRENT P2 INITIATIVES**
- 9.5 POTENTIAL P2 INITIATIVES**

CHAPTER 10 EPA PRIORITY CHEMICALS

10.1 GOALS

10.2 BASELINES AND PROGRESS

10.3 DESCRIPTION OF CHEMICAL USE

For each EPA priority chemical used at the installation, provide a description of how and where it is used.

10.4 CURRENT P2 INITIATIVES

10.5 POTENTIAL P2 INITIATIVES

CHAPTER 11 OZONE DEPLETING SUBSTANCES

11.1 GOALS

11.2 BASELINE AND PROGRESS

11.3 ODS-CONTAINING EQUIPMENT

Provide a brief description of the types of equipment on post that use Ozone Depleting Substances. Examples may include air conditioners, refrigeration systems, ice machines, fire suppression systems, etc.

11.4 CURRENT P2 INITIATIVES

11.5 POTENTIAL P2 INITIATIVES

CHAPTER 12 VEHICLE FUEL

- 12.1 GOALS**
- 12.2 BASELINE AND PROGRESS**
- 12.3 CURRENT P2 INITIATIVES**
- 12.4 POTENTIAL P2 INITIATIVES**

CHAPTER 13 ENERGY

- 13.1 GOALS**
- 13.2 BASELINE AND PROGRESS**
- 13.3 CURRENT P2 INITIATIVES**
- 13.4 POTENTIAL P2 INITIATIVES**

CHAPTER 14 AFFIRMATIVE PROCUREMENT

14.1 AFFIRMATIVE PROCUREMENT BACKGROUND

14.2 CURRENT AFFIRMATIVE PROCUREMENT INITIATIVES

14.3 POTENTIAL AFFIRMATIVE PROCUREMENT INITIATIVES

APPENDICES

Appendices B-M are intended to provide detailed pollution generation information that is pertinent to evaluating many of the p2 opportunities identified in the body of the P2 plan. Note, however, that none of these appendices are meant to incur additional data reporting on the part of the installation. Rather, they are meant to be a central place to store data that already exists from other sources. For example, the air emissions data in appendix E may simply be a photocopy of the summary table from the installation's last emissions inventory report; the solid waste data in appendix D could be lifted straight from the most recent copy of the Installation's Integrated Solid Waste Management Plan; the hazardous waste data in appendix C might be a printout from the DRMO's disposal records or from the installation's HSMS pharmacy; and the vehicle fuel use data in appendix K could be a copy of the DOL's vehicle inventory and usage records.

REFERENCES	APPENDIX A
EPR SUBMISSIONS.....	APPENDIX B
LIST OF COMPLIANCE SITES AND PERMITS	APPENDIX C
HAZARDOUS AND INDUSTRIAL WASTE GENERATION.....	APPENDIX D
SOLID WASTE GENERATION AND DIVERSION.....	APPENDIX E
AIR EMISSIONS.....	APPENDIX F
WATER CONSUMPTION.....	APPENDIX G
WASTEWATER GENERATION	APPENDIX H
TRI RELEASES	APPENDIX I
EPA PRIORITY CHEMICAL INVENTORY.....	APPENDIX J
OZONE DEPLETING SUBSTANCE INVENTORY	APPENDIX K
VEHICLE FUEL USE.....	APPENDIX L
ENERGY USE.....	APPENDIX M