## TABLE B-1.—LIST OF POLLUTION PREVENTION ALTERNATIVE PRACTICES

- 1. Must use spray nozzles on hoses used for rinsing (or other flow reduction devices).
- 2. Must practice good housekeeping:
  - (1) perform preventative maintenance on all valves and fittings and repair leaky valves and fittings in a timely manner;
  - (2) use drip pans under leaky valves/fittings, collect for reuse when possible; and
  - (3) perform quick cleanup of leaks and spills in outdoor bulk storage or process areas.
- 3. When performing drum rinsing (of liquid PAI or inert) for formulation of water-based products
  - Must reuse the drum/shipping container rinsate DIRECTLY into the formulation at the time of formulation, store for use in next formulation or use staged drum rinsing station (counter current rinsing).
- 4. If all interior rinsate cannot be reused for a reason listed in Table B-2, # 5, ▶

Must dedicate some equipment in at least one of the ways listed below.

Dedicate to:

- (a) frequently produced product (i.e., top production product);
- (b) hard to clean products (i.e., viscous, sticky, colored products)
- (c) product families
- (d) a portion of the formulating/packaging equipment (i.e., just the mix tank or just the agitator)
- 5. Must sweep or vacuum dry production areas prior to rinsing with water.
- 6. If operating air pollution control wet scrubbers must operate as recirculating scrubbers (periodic blowdown is allowed as needed).
- 7. If operating continuous overflow Department of Transportation (DOT) aerosol leak test baths must operate with some recirculation.

## Note

- (1) After following the practices above, some wastewaters may require treatment prior to discharge to POTWs. See definition of pollution prevention allowable discharge.
- (2) After following the practices above, all wastewaters require treatment prior to discharge directly to the nation's waters. See definition of pollution prevention allowable discharge.

## TABLE B-2.—LIST FOR POLLUTION PREVENTION ALTERNATIVE—OTHER PRACTICES

[May be modified with acceptable justification]

- A modification to the list of practices on this table that an individual facility must comply with to be eligible for the pollution prevention alternative is allowed with acceptable justification. A modification, for purposes of this table, means that a facility would no longer have to perform a listed practice or would need to comply with a modified practice. However, the modification only applies to the specific practice for which the modification has been justified and to no other listed practices. Facilities are required to thoroughly discuss all modifications in the "necessary" paperwork as described above in the limitations and standards.
- 1. When performing drum rinsing (of liquid PAI or inert) for formulation of solvent-based products
  - Must reuse the drum/shipping container rinsate (solvent) DIRECTLY into the formulation at the time of formulation or store for use in next formulation.
  - [Modification allowed when: drums are going to a drum refurbisher/recycler and they will only accept drums rinsed with water.]
- 2. Must use low volume/high pressure rinsing equipment for rinsing PFPR equipment interiors when rinsing with water.
  - [Modification allowed when: rinsing narrow transfer lines or piping where sufficient rinsing is better achieved by flushing with water.]
- 3. Must use a floor scrubbing machine to clean floors in liquid production areas.
  - [Modification allowed when: facility has uneven floor surfaces or crowded areas where floor scrubber cannot fit, BUT must then use a mop and bucket.]
- 4. Must dedicate PFPR production equipment by water-based versus solvent-based products.
  - [Modification allowed when: facility can provide evidence, such as production information, of infrequent/very intermittent formulation of one or the other or facility has installed and is using a solvent recovery system.]
- 5. Must store the rinsate from interior rinsing for future formulation of SAME or compatible product.

[Modification allowed when:

- (a) evidence of biological growth or other product deterioration over typical storage period;
- (b) space limitations, BUT must still store rinsates for most frequently produced products;
- (c) manufacturer (or formulator contracting for toll formulating) has directed otherwise (i.e., send back to them or send for off-site disposal); or
- (d) facility is dropping registration or production of formulation at the facility after present campaign;
- (e) facility only performs packaging of the pesticide product from which interior rinsate is generated.]

## Note:

- (1) After following the practices above, some wastewaters may require treatment prior to discharge to POTWs. See definition of pollution prevention allowable discharge.
- discharge.

  (2) After following the practices above, all wastewaters require treatment prior to discharge directly to the nation's waters. See definition of pollution prevention allowable discharge.