



Pollution Prevention (P2) Program Overview

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2026

Topics



P2 Program Overview

Definition, P2 Plans, and Reporting Applicability



Reporting Requirements & Expectations

Timelines, review process, and overlaps



Resources

Guidance docs, reporting tools, reference materials



myDEQ Walkthrough

Annual Progress Report



Questions & Feedback

Closing discussion and contact information

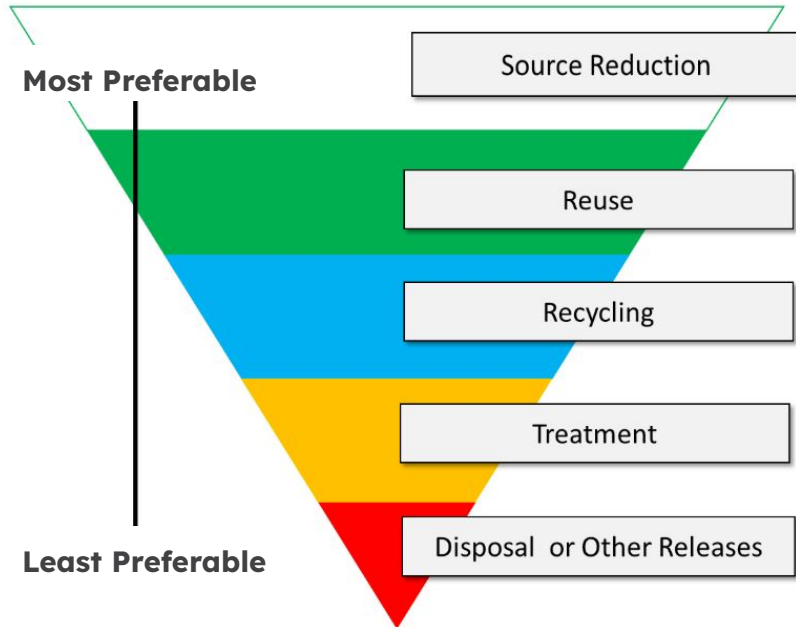


Program Overview

Definitions & Reporting Applicability



What is Pollution Prevention (P2)?



Source reduction

- Practices that reduce or prevent pollution before recycling, treatment or disposal
- Defined under the Pollution Prevention Act of 1990
- Arizona includes recycling as a form of source reduction

What is a P2 Plan?

- A facility management strategy for reducing waste and toxic substance use
- Required under Arizona Revised Statutes (A.R.S.) § 49-961 through A.R.S. § 49-964
- Identifies opportunities for:
 - Waste reduction
 - Resource conservation
 - Operational efficiency
- Can address:
 - Hazardous waste
 - Toxic substances
 - Solid waste
 - Energy and water use



P2 Reporting Applicability

A.R.S. §§ 49-962 & 49-963



1. TRI Reporting

Filed **EPA** TRI Form R or Form A in the previous year.



2. Hazardous Waste Generation

≥ **26.4 lbs/year** of acute hazardous waste

≥ **26,400 lbs/year** of non-acute hazardous waste



3. Toxic Substance Use

Uses ≥ **10,000 lbs/year** of a TRI-listed substance.

A facility only needs to meet one of the above thresholds to be subject to P2 Program requirements.

P2 Filing Exemptions

Facilities that meet P2 applicability thresholds may still qualify for a filing exemption under certain conditions:



Tribal Land

Located on tribal land.



HHW Facility

Household Hazardous Waste collection facility.



Waste Management

Primarily permitted for waste treatment, storage, or disposal.



Agricultural Pesticides

Qualifying pesticide activities or general permits.



One-time Event

Qualifying one-time hazardous waste generation event.



Mining & Metallurgy

Qualifying toxic substance use under A.R.S. §49-963.

Facilities may voluntarily submit a P2 Plan even if exempt

P2 Substantive Policy - A.R.S. §49-963

Mining & Metallurgical Operations Guidance

What the Policy Clarifies

- Mining operations and related activities
- Metallurgical operations and related activities
- Interpretation of “used”
- Applicability of the 10,000 lb toxic substance use threshold under A.R.S. §49-963

Important Considerations

- Some mining/metallurgical use may not count toward the filing threshold
- Facilities may still be subject to P2 requirements through:
 - TRI reporting thresholds
 - Hazardous waste generation thresholds
- Refer to ADEQ’s Substantive policy for detailed guidance

Arizona P2 Program Industry Snapshot



**Semiconductor &
Electronics**



Defense & Government



Chemical Manufacturing



**Metal Finishing &
Fabrication**



Mining & Metallurgy



Energy & Utilities



Retail & Distribution



Warehousing & Logistics



Higher Ed & Research

P2 applicability is based on statutory reporting thresholds, not industry type alone

Reporting Requirements and Expectations



Reporting Requirements

Annual Progress Report (APR)



- Due **July 1** each year
- Includes updates on goal progress
- Focuses on **past** performance and completed outcomes

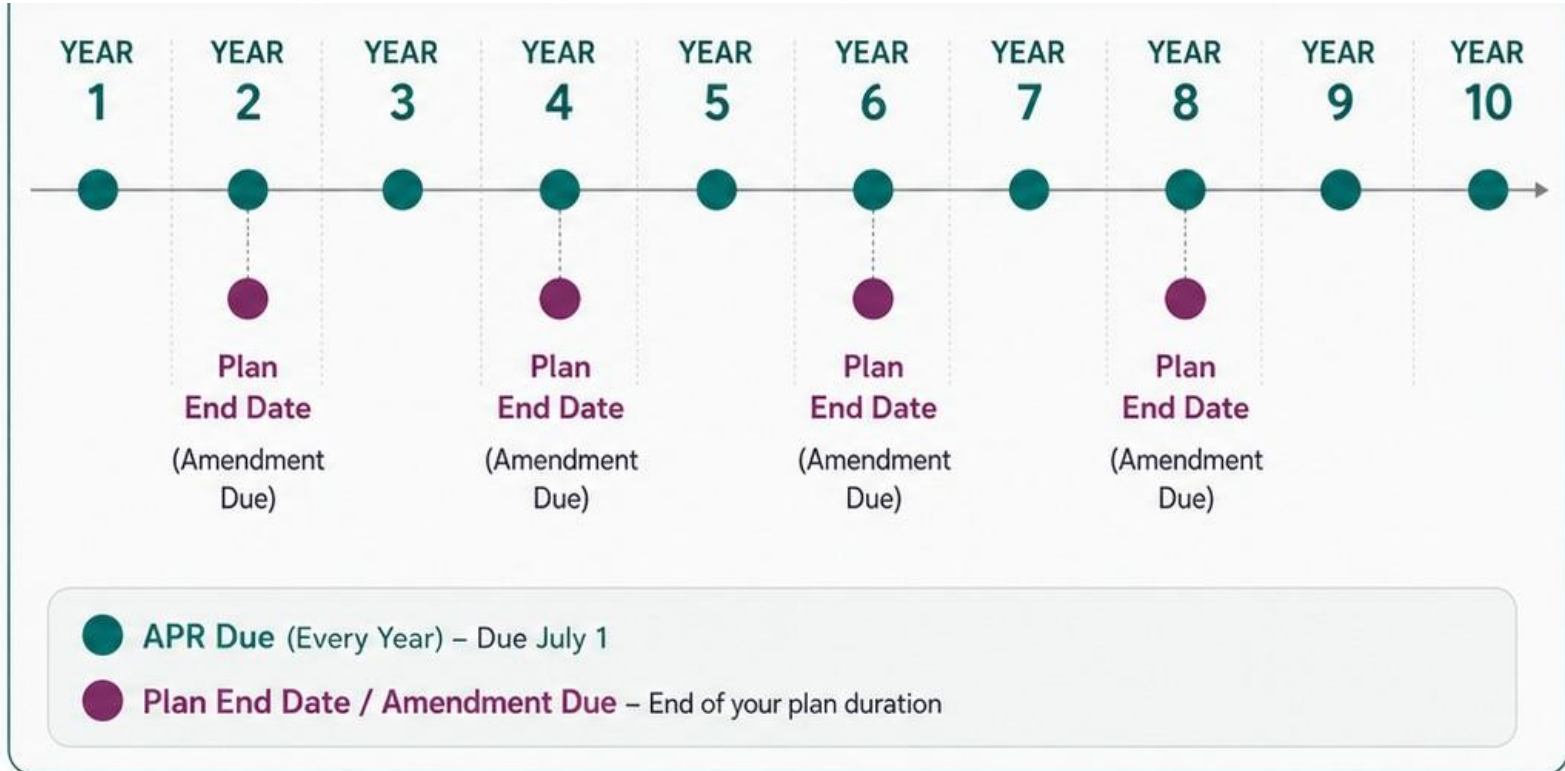
Amendment (AM)



- Due when your plan ends
- Plan durations may range **2-6** years
- Establishes **future** planning and upcoming goals

Example Timeline

P2 Plan Duration = 2 years



Submission Review Timeline



ADEQ Review Process

- ADEQ reviews submitted APRs & AMs for completeness and adequacy
- Facilities may receive requests for clarification or revisions
- ADEQ generally issues deficiency notification within **90** days of submission review

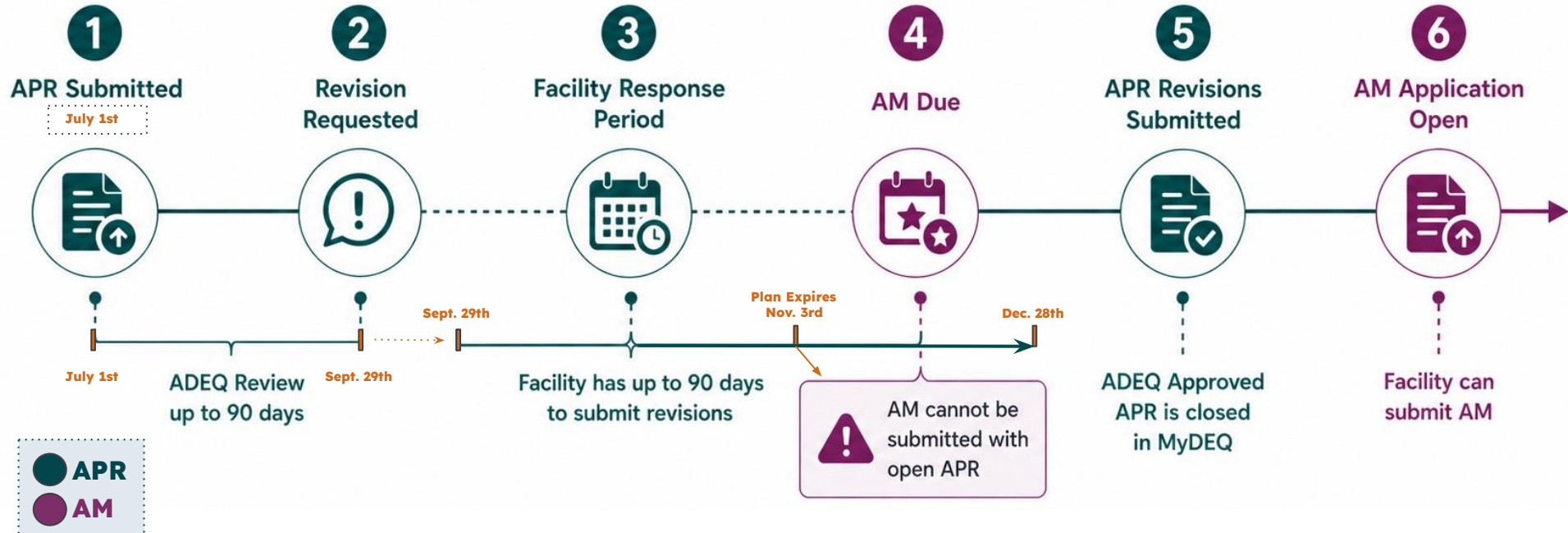


Facility Response Expectations

- Facilities are provided additional **90** days to address identified deficiencies
- Failure to submit required reports or respond to deficiencies may result in additional compliance actions under [A.R.S. § 49-964](#)

Application Overlaps & Submission Timing

myDEQ allows *one* open P2 application at a time. Open submissions must be complete before new submissions can be accepted.



KEY TAKEAWAY: Timely responses help facilities maintain compliance and avoid delays in future submissions.

Resources

Tools, Guidance, and Reference Materials



P2 Program Resources



Program Eligibility

Determine business's eligibility

- [Threshold Screening Tool](#)
- [Exemptions](#)
- [P2 Substantive Policy](#)



Guides & Reporting

Reporting Guides & User Resources

- [P2 Reporting Flow Diagram](#)
- [P2 Planning Toolkit](#)
- [P2 Resource Summaries](#)

myDEQ Walkthrough

Video: [Annual Progress Report Process in myDEQ](#)





DEQ

Arizona Department of Environmental Quality



Access myDEQ

[myDEQ Login](#)

[myDEQ Help Center](#)



Help Desk Support

Contact Information:

myDEQ.support@azdeq.gov

(844) 827-4768

Action Item for All P2 Plan Holders

Please add these important dates to your professional calendar:



Annual Progress Report

July 1st

Annual Progress Report (APR) due date for the previous calendar year.



Amendment

Facility Specific

Your facility's current P2 Plan expiration date

Questions & Feedback



Contact Details

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[P2 Reporting Guide](#)



Schedule a Meeting

Ready to discuss? Use the link below to book a consultation.

[P2 Plan Virtual Assistance Booking](#)