

Frequently Asked Questions for the Operation Clean Sweep[®] (OCS) Data Reporting Program

February 2024

What does a company report to the OCS program?

A company reports the OCS Core Metrics:

1. The total number of unrecovered releases greater than 0.5 liters or 0.5 kilograms (kg) per incident.
2. Total volume or weight of unrecovered plastic pellets, flakes, powders, or granules within the physical custody of a member company greater than 0.5 liters or 0.5 kilograms (kg) per incident.

Who reports data?

Only OCS Blue and OCS Logistics members are required to submit quarterly data for Q1-3 2024. By Q4 2024, all OCS members must report quarterly data. OCS Rail members are currently exempt from quarterly reporting. Companies are required to submit one report per quarter; this report must include data from all the member's OCS registered facilities in the United States.

Why is reporting mandatory?

Data reporting establishes industry accountability and transparency. By reporting data, OCS members can track their own progress towards zero plastic resin loss, identify potential areas for enhancement, and implement corrective measures where necessary. Data reporting also enables the OCS program to identify trends and provide the necessary resources to support the decrease in unrecovered releases.

What is in scope for OCS data reporting?

The OCS program addresses plastic resin in the form of pellets, flakes, powders, and granules.

What does “unrecovered” mean?

Unrecovered means plastic resin that is no longer in a company’s physical possession and is lost to the environment. Unrecovered material meeting the thresholds described above must be reported to the OCS Program, therefore, unrecovered = reportable.

Is a spill, release, and incident the same thing?

No, the OCS program differentiates the terms.

- a. **Incident** – an occurrence arising out of the handling of plastic resin that has an impact on the environment.
- b. **Spill** – plastic resin that may be contained or recoverable, such as spilling plastic pellets on a production floor that can be swept up.
- c. **Release** – plastic resin that is lost to the environment and is unrecoverable.

Does an OCS member report releases from each individual facility separately?

No, a company submits one data reporting form each quarter for all its registered facilities in the United States.

If an OCS member cleans up spilled material does the member still have to report it?

No, plastic resin that has been cleaned up and recovered is not reported to the OCS Program. However, it’s beneficial to keep track of recovered spills and conduct a root cause analysis and identify potential areas for continual improvement.

What is an example of an unrecovered, reportable release?

A truck carrying plastic flakes is in an accident and the material is released on the highway. Under this scenario, 20 kilograms of the material has dispersed and cannot be recovered, therefore it must be reported to the OCS program. If some of the material is vacuumed up and recovered, the member only reports to OCS that an incident occurred and include the weight or volume of plastic resin that was released to the environment.

In another scenario, pellets are being transferred from a truck to a silo, but there is an equipment failure, and some of the pellets are spilled in the grass and gravel driveway. More than 10 kilograms of the pellets fall into the stormwater drain and cannot be recovered as the drain cover has been removed for cleaning or repair. OCS requires that an estimation be made as to the total weight or volume of pellets lost to the storm drain and be reported to the OCS Program.

Could you provide an example of a contained versus not contained incident?

A company has mesh lining for their drains within the warehouse; an incident occurs where pellets are spilled within the warehouse next to the drain. Pellets that are collected in the drain lining are contained to the extent they are recovered by an employee. Without the drain lining, some of the pellets would have been lost to the environment through the stormwater drain and would need to be reported if the volume was greater than 0.5 kg.

Contained = Recoverable; Uncontained = Unrecovered

An OCS member had more than .5 kg of material that was contained, but due to inclement weather that material is now lost. How should the member report this?

That material is now considered unrecovered and must be reported to the OCS Program with an estimate of how much plastic resin was released.

How does an OCS member estimate a release if they're not sure how much material was lost?

Members are required to estimate the volume or weight of a release to the best of their ability. Members may calculate the approximate weight that has been lost from a shipment; other members may use visual tools for comparing the size of a release to a familiar object like a shoe, coffee cup, or how much material fits into a 1-Liter plastic bottle.

Does an OCS member report data from their transportation partners?

While not mandatory, members are encouraged to track and report any unrecovered releases experienced by their transportation partners. This optional data reporting is provided to OCS through a separate section of the member's quarterly report form to keep member data separate from transportation partner data. Members must confirm their transportation partners are not reporting this data directly to OCS to eliminate the possibility of double-counting. By tracking incidents that occur in transit, members and their transportation partners may identify areas for improvement and implement corrective action. For example, corrective actions might include storing plastic pellets in a different type of packaging to reduce incidents in transit.

Should an OCS member separately report data from a release that occurred during transportation if they own the fleet?

No, releases that occur in transit by a fleet owned by the OCS member must be included in the member's quarterly report and not in the optional transportation partner section, as this material is still in the possession of the OCS member.

What's the purpose of reporting optional metrics?

While some of the metrics included on the data reporting form are optional, they help OCS members to track their supply chain and work with their partners to improve the handling and transfer of material to reduce product-related incidents.

How is data reported to the OCS Program handled and used?

Data is collected through a protected platform. Aggregated data is then shared externally in an Annual OCS Impact Report as part of the ongoing efforts to increase the rigor and credibility of the OCS Program. Aggregated data shared externally shall be reviewed by OCS workgroups and committee members to identify potential trends and areas for program and operational improvement.

What are the OCS Program's data handling and privacy policies?

Companies' individual data points will be handled as confidential business information and retained for a five-year period and industry's aggregated data points will be retained for a ten-year period, consistent with retention practices already being followed by several companies and programs, including Responsible Care®.