

US EPA ARCHIVE DOCUMENT

**Quarterly Report to USEPA
October 1, 2005 – December 31, 2005**

**State Innovation Grant – Improved Environmental Results and Increased Regulatory
Flexibility in Air Permitting for the Printing Sector Using EMS and ERP
Cooperative Agreement No. PI 965809-01**

**Submitted by:
Wisconsin Department of Natural Resources**

Through this cooperative agreement the Wisconsin Department of Natural Resources (WDNR) will be piloting two alternative approaches for Wisconsin's printing industry. For larger printing facilities, a performance-based Environmental Management System (EMS) combined with a Title V permit will be developed with several pilot facilities. For the small printers, an Environmental Results Program (ERP) modeled after the work done with the industry in Massachusetts is being developed in collaboration with the Wisconsin Department of Commerce (WDCOMM). Included in this quarterly report is a summary of the progress achieved to date on milestones identified in the June 30, 2005, final project narrative and work plan.

	Performance-based EMS permit Milestones	Environmental Results Program Milestones
September 2005	Select participating facilities Gather baseline data Establish interested parties group Establish multi-media team	Develop performance indicators Identify universe of sources Gather data on administrative effort for current compliance or permit activities
December 2005	Provide training on EMS to WDNR staff Provide training for interested parties group and facilities on roles and responsibilities	Develop workbook and inspection checklists Database development Develop statistical methodology

The major expenditures during this quarter were the establishment of a contract with the Department of Commerce Small Business Assistance Program of \$25, 000 to support their efforts in the development of an Environmental Results Program for printers.

Performance-Based Environmental Management System Permit

The working group engages in bi-weekly conference calls. Participants on these calls include representatives from each of the participating facilities as well as representatives from the WDNR, the Screen Graphics Imaging Association (SGIA) and the Printing Industry of Wisconsin (PIW). Discussions early in the process focused on regulatory flexibilities. More recently conversations have progressed to discussions about individual companies successes with the development of their EMS. A draft EMS permit outline has been provided to the working group.

Participants - Participants include four Wisconsin printers including Moore Wallace Response Marketing Services-an R.R. Donnelly Company, Serigraph Incorporated, Bemis Company Incorporated and Arandell Corporation. The participating members have convened three times since August of 2005. With the help of the WDNR the group has been presented with testimonials from various businesses in Wisconsin that have either participated in the Environmental Cooperative Pilot Program (ECPP,) the precursor to Green Tier, or is currently enrolled in the Green Tier program. The value of stakeholder involvement and environmental management system implementation experiences were some of the topics covered in these sessions. Those that have provided presentations include Skavronack Consulting, Cook Composites and Polymers, Wisconsin Energy Corporation, University of Wisconsin-Extension, MEGTEC, Northern Engraving and representatives from the WDNR.

At present two of the four companies have began work on their EMS and have made significant progress, with the two remaining companies idling. The causes for delayed progress with the later two companies can be attributed to several factors. In one case insufficient buy-in from upper management has delayed progress. However, the expectation of the WDNR is that buy-in will occur shortly after the first of the year.

For the second company the issue is not whether to implement an EMS, rather the delay is driven primarily because of lack comfort with what lies ahead and how best to implement a program that will be met with success. The hesitation is currently being addressed by providing the facility with additional contact with companies with a documented EMS. It is our expectation that the facility will have begun implementing their EMS shortly after the first of the year. The group, as a whole, has passed a significant milestone in that each is now actively pursuing the benefits of an EMS and its capacity to complement the requirements of Title V permits.

Baseline Data - Ongoing. This data has not been completely identified. Some of the data elements of interest include level of community involvement, discharges to the environment, compliance, and administrative costs associated with meeting environmental responsibilities.

Interested Parties Group - Delayed. The facilities reacted unexpectedly to the public involvement presentation by Skavronneck Consulting and Cook Composites and Polymers. Cook Composites had turned around a very adversarial relationship with the public through an interested parties group. The pilot facilities all said that they did not have an adversarial relationship to fix and were uncomfortable drawing attention to themselves. As a result, the working group is reevaluating the role of interested parties groups.

Multimedia Team - Delayed. After talking with facilities it was noted that air pollution regulations far and away dominate the regulatory challenges for facilities. Though they are interested in keeping the door open to bring in other media, it seems appropriate to wait until facilities enroll in Green Tier and use the multimedia communication plan built into that program. Facilities are expected to enroll in Green Tier by the first of the year and at that time multimedia teams will be established.

Staff EMS Training - Completed. Kristin Hart, EMS Permit Principal Investigator, successfully completed a 36-hour EMS Lead Auditor training course in August 2005.

Roles and Responsibilities Training - Delayed. This training is linked to the establishment of interested parties groups and will be delayed until they are established.

Environmental Results Program

Substantial progress was made in the past quarter completing a draft workbook and preparing an initial list of performance indicators.

Performance Indicators - Ongoing. Draft Environmental Business Practice Indicators (EBPI) developed by the ERP working group.

Identify Universe of Sources - Ongoing. The databases needed to develop a final tally have been acquired. Once combined, duplicates must be eliminated manually. We will seek assistance from the industry representatives to ensure that correct SIC and NAICS are used to select facilities most likely to fit the eligibility criteria.

Gather Data on Permit and Compliance Administrative Effort - Incomplete. Important components have been identified however no data collection has been initiated.

Develop Workbook and Checklist - Ongoing. Completion of a draft workbook expected in January.

Develop Database and Statistical Methodology - Ongoing. Obtaining a user interface for the baseline survey is the limiting factor in moving forward. We are soliciting software from other states to modify for use in Wisconsin that will allow us to collect and manage data electronically.