

US EPA ARCHIVE DOCUMENT

**Quarterly Report to USEPA  
October 1, 2006 – December 31, 2006**

**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**

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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 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. Changes to milestone dates are identified in the following table (*month year*).

	<b>Performance-based EMS permit Milestones</b>	<b>Environmental Results Program Milestones</b>
<b>September 2005</b>	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
<b>December 2005</b>	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
<b>March 2006</b>	For participating facilities establish environmental goals and measures	Conduct inspector training ( <i>December 2006 through January 2007</i> )
<b>June 2006</b>	Evaluate and revise QAPP and work plan ( <i>January 2007</i> ) Establish compliance methodology ( <i>January 2007</i> )	Evaluate and revise QAPP and work plan ( <i>February 2007</i> ) Perform baseline inspections ( <i>February 2007</i> )
<b>September 2006</b>	Obtain data on satisfaction with new public participation process ( <i>January 2007</i> ) Initiate development of draft permits Identify multimedia impacts	Analyze data and revise workbooks and inspection checklists ( <i>April 2007</i> )
<b>December 2006</b>	Issue performance-based permits ( <i>April 2007</i> ) Evaluate the permit review process	Prepare and provide technical assistance workshops ( <i>May 2007</i> )

***Performance-Based Environmental Management System Permit***

This quarter, work continued on drafting of the EMS permits. The two pilot facilities both provided ideas for performance goals and incentives that are to be incorporated into their permits. A method to calculate emission caps was agreed upon as well. Drafts of the permits are now being prepared. One pilot facility submitted its application to Tier I of Green Tier in December. The other pilot facility is preparing for an audit of its EMS which will show that it now qualifies for Tier II of the Green Tier Program.

Participants - Completed. Participants include four Wisconsin printers including Moore Wallace Response Marketing Services-an R.R. Donnelly Company, Serigraph Incorporated, Bemis Company Incorporated and Arandell Corporation. Serigraph has initiated EMS permit development and expects to obtain EMS initial certification by January 2007. Arandell Corporation is also looking at a January 2007 initial certification for their EMS.

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. DNR participated in conference calls with EPA to discuss finalizing evaluation methods. We agreed on basic questions to answer. Plans have been made to meet with Ross Assoc for assistance in developing methods to measure appropriate baselines.

Interested Parties Group - Ongoing. Questionnaire developed to obtain baseline data on satisfaction with public participation process. A January 2007 report is planned. WDNR was unable to attend CERES FRP discussion in Michigan.

Multimedia Team - Ongoing. Work has continued to establish relationships across programs in DNR. The Pilot facilities have identified permit requirements of other programs that they would like included in their Performance Based Permits. A cross media compliance contact person has been established for one facility. Upon acceptance into Green Tier, our other pilot facility will also have a designated cross media contact person.

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 would be available as part of FRP. This training will be delayed until a firm decision is made as to how to establish interested persons groups.

Establish Environmental Goals and Measures - Ongoing. Serigraph and Arandell are both nearing completion of their EMS's Both facilities are planning to have their systems audited next quarter.

Evaluate and Revise QAPP and Work Plan - Delayed. QAPP and work plan will be revised in the next quarter after discussions with Ross and Associates.

Establish Compliance Methodology - Ongoing. Compliance language is being drafted for the EMS permit. Some areas will reference the facility's EMS. The facilities do not want all compliance language to be contained in their EMS, however. Draft permit language has been developed to find a middle ground that works for regulator and regulated.

### ***Environmental Results Program***

This quarter a few barriers delayed aspects of the project. The air registration permit was not ready for public comment until late December 2006. As a result completion of the Air Chapter of the compliance assistance workbook cannot be completed until conditions from the final air registration permit are incorporated. WDNR decided on the sample size and statistical methodology so we could begin to write up the statistical methodology report. That will be completed next quarter, prior to starting the baseline inspections. Inspector training could not be scheduled during December, but dates were set for early January for visits to several printer facilities for trials of the inspection data collection process to be used for the baseline evaluations.

Performance Indicators - Completed. Environmental Business Practice Indicators (EBPI) developed by working group.

Identify Universe of Sources - Completed. Universe of printing facilities to target has been determined. 3,000 facilities have been identified. Ready to determine the target number of facilities to be surveyed to establish the baseline compliance level.

Gather Data on Permit and Compliance Administrative Effort - Incomplete. Important components have been identified however no data collection has been initiated. Will conduct concurrent with baseline inspections, as much as possible.

Develop Workbook and Checklist - Ongoing. Workbook completion delayed until air registration permit development is complete. Completion of the air registration permit for printers is expected following the public comment period that ends January 29, 2007. Other chapters are 99% complete and will be shared with EPA upon completion. Checklist has been completed for including in inspection software.

Develop Database and Statistical Methodology - Ongoing. We currently have a functioning data entry product for our baseline inspections. WDNR has decided on a statistical methodology and will sample 190 printers during baseline and follow-up inspections. The statistical methodology report is being drafted, and it will be completed prior to starting baseline inspections.

Conduct Inspector Training - Ongoing. Visits at printers scheduled for early January to test out the data collection process with the Access database loaded on Tablet PCs. Based on test runs at larger facilities, the inspectors will decide whether formal lecture style training is necessary and additional site visits would be helpful.

Evaluate and Revise QAPP and Work Plan - Delayed. QAPP and work plan will be revised in the next quarter, following completion of the statistical methodology.

Perform Baseline Inspections - Delayed. Baseline inspections are planned to begin in February 2007. Sample size has been selected and random list generated. Assignments for inspections will be established after inspector training has been completed.

Analyze Data and revise workbooks and inspection checklists - Delayed until April 2007, after completion of baseline inspections.

Prepare and provide technical assistance workshops - Delayed until May 2007, after compliance workbook has been completed. Discussions with the printers have led us to consider using the Mediasite Live technology to allow printers to view the training from their own office or home at a time that is most convenient to them. This will save time and money, and likely get a wider audience, compared to holding five or six workshops at different locations around the state.