

US EPA ARCHIVE DOCUMENT

**Quarterly Report to USEPA
April 1, 2006 – June 30, 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.

	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
March 2006	For participating facilities establish environmental goals and measures	Conduct inspector training
June 2006	Evaluate and revise QAPP and work plan Establish compliance methodology	Evaluate and revise QAPP and work plan Perform baseline inspections

To support automated data collection for the ERP inspections four tablet personal computers and supporting software were obtained.

USEPA representatives are now participating in workgroup meetings for both the EMS Permit and ERP.

Performance-Based Environmental Management System Permit

The Ceres Facility Reporting Project (FRP) is being actively investigated by the working group as the means of engaging interested parties by each participant. Ceres is a national network of investment funds, environmental organizations and other public interest groups working to advance environmental stewardship on the part of businesses. In 2003, Ceres and the Tellus Institute launched the Facility Reporting Project (FRP) as a multi-stakeholder effort to develop consistent, comparable, and credible economic, environmental and social reporting guidance. The FRP has developed Sustainability Reporting Guidance in order to strengthen facility accountability to the public and other facility stakeholders by enabling them to report their economic, environmental and social performance to the public.

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.

Interested Parties Group - Ongoing. Questionnaire developed to obtain baseline data on satisfaction with public participation process. Contact was made with Ceres to investigate the use of the Facility Reporting Project (FRP) as a model for public involvement. Pilot group discussion about use of FRP has been cautiously positive. We have discussed with Ceres the possibility of a FRP presentation in Wisconsin for our participants.

Multimedia Team - Ongoing. Regional waste water and air program staff met with Serigraph for a presentation on their EMS and EMS permit.

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 and have completed objectives and targets. Both facilities have submitted flexibilities that they are interested in establishing in their EMS permit. Serigraph is implementing an energy reduction program and a bucket recycling program. Both facilities are thinking about goals that could be included in their EMS Permits.

Evaluate and Revise QAPP and Work Plan - Delayed. QAPP and work plan will be revised in the next quarter.

Establish Compliance Methodology - Ongoing. We have confirmed with EPA Region 5 the ability to reference sections of an EMS in an air pollution control permit. The operational control section of the facility's EMS will be used in as compliance demonstration in EMS permits. The next step is the preparation of draft language for the operational control section for review and approval.

Environmental Results Program

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

Identify Universe of Sources - Ongoing. 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. Baseline facility inspections will occur this fall.

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. Workbook completion delayed until registration permit development is complete. This is expected to be accomplished in August 2006.

Develop Database and Statistical Methodology - Ongoing. Obtaining a user interface for the baseline inspections is the limiting factor in moving forward. We are soliciting software from other states to modify for use in Wisconsin. Massachusetts inspection data system appears suitable for Wisconsin's use with

some programming revisions and is under evaluation. We continue to gather information about how to develop the statistical methodology, especially given the large universe of sources.

Conduct Inspector Training - Delayed.

Evaluate and Revise QAPP and Work Plan - Delayed. QAPP and work plan will be revised in the next quarter.

Perform Baseline Inspections – Delayed pending establishment of inspection software, database development and establishing statistical methodology. Baseline facility inspections will occur this fall.