

US EPA ARCHIVE DOCUMENT

**Quarterly Report to USEPA
April 1, 2007 – June 30, 2007**

**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 in **blue text**. Recent milestone changes are reflected in **green text**.

	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 (December 2006 through March 2007)
June 2006	Evaluate and revise QAPP and work plan (January 2007) Establish compliance methodology (January 2007)	Evaluate and revise QAPP and work plan (February 2007) Perform baseline inspections (April through June 2007)
September 2006	Obtain data on satisfaction with new public participation process (January 2007) (New date: Spring 2008) Initiate development of draft permits Identify multimedia impacts	Workbook and checklist to printer (May 2007) Analyze data and revise workbooks and inspection checklists develop targeted materials for training based on inspections (Late June 2007)
December 2006	Complete draft performance Based Permit (April 2007) Issue performance-based permits (April 2007) (New date: November 2007)	Prepare and provide technical assistance workshops (July 2007)
January 2007	Evaluate the permit review process (December 2007)	Facilities conduct inspections and submit self-certification (July through August 2007) Conduct State-to-state ERP Collaboration (Fall 2007 or Winter/Spring 2008)

April 2007	Collect first round of data for pilot and control facilities and complete an initial evaluation of the EMS permit approach	Evaluate self-certifications and implement targeted follow-up activities including response to RTC plans <i>(October/November 2007)</i>
July 2007		Perform post certification inspections <i>(November/December 2007)</i>

Performance-Based Environmental Management System Permit

This quarter, draft permits were presented to internal staff and comments are being incorporated. Arandell Corporation has been accepted into Tier I of Green Tier and continues to prepare for an audit of their EMS. Serigraph submitted their annual report and is preparing a letter of Intent to enter Tier II. Acceptance into Tier II is necessary in order to receive the flexibilities in the performance-based permit.

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. Conference calls were held in April 2007 and June 2007 with Ross and Associates, Colorado, and EPA to help develop and refine common measures to evaluate the project.

Interested Parties Group - Ongoing. No new progress. Discussions with CERES concerning their Facility Reporting Project have been put on hold for the time being. Facilities prefer to publish the availability of their EMS for public view in local media outlets.

Multimedia Team - Ongoing. A Single Point of Contact for multimedia regulatory responsibilities has been designated for Arandell and Serigraph. Serigraph requested multimedia requirements in its performance-based 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 Facility Reporting Project. This training will be delayed until a firm decision is made as to how to establish interested persons groups. If facilities do not use the Facility Reporting Project protocol, training for interested public participants will not need to be performed.

Establish Environmental Goals and Measures - Completed. Serigraph and Arandell included environmental goals and measures in their applications for Green Tier. Draft performance-based permits contain performance goals and proposed measures.

Evaluate and Revise QAPP and Work Plan - Delayed. QAPP and work plan will be revised after common measures activity is completed.

Establish Compliance Methodology - Ongoing. Draft permit compliance language completed and discussed within the Air Management Program.

Environmental Results Program

Training extended much longer than a simple half day walk through of all the baseline evaluation questions. Issues came up during a walk through of the questions, which required significant reprogramming of the Access database, used by the inspectors on their Tablet PCs. As trial inspections

were conducted over two to three weeks, other issues developed that required further refinement. Inspection schedules could not be completed until the Access database template was ready. As pre-inspection contacts were made to refine the sample list, a steady stream of drop-outs was encountered. This also delayed completion of 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 - In progress. Some data was collected during the recent quarter, but it has not been analyzed yet.

Develop Workbook and Checklist - Complete. Workbook materials were completed once the Printers' registration permit was finalized. Some early inspections indicated certain changes were necessary prior to a final printing. Printing bids would begin in April 2007.

Develop Database and Statistical Methodology - Ongoing. The database has been refined sufficiently to allow inspectors to conduct the baseline evaluations. A proposed statistical methodology was submitted to EPA Region 5 in March 2007.

Conduct Inspector Training - Completed. No formal lecture style training was conducted. Multiple sessions were held with WDNR program experts to walk through the baseline evaluation questions and discuss likely scenarios of what violations might be uncovered. The inspectors decided it would be important to include WDNR program experts on some of the trial inspections to improve their understanding program requirements.

Evaluate and Revise QAPP and Work Plan - Delayed. Statistical Methodology was under review early in this quarter. No one was available to conduct QAPP update as other elements of program took up all the time.

Perform Baseline Inspections – Completed on June 29, 2007. Baseline evaluations started slowly during March 2007 following the training sessions with program experts. It was determined at the end of May 2007 that inspectors would be unable to reach more than the initial 250 contacted in the hopes of completing 190 inspections. Because many of the facilities turned out to be something other than a printing operation, in the end less than 100 valid inspections were completed. There were a few facilities that declined to have an inspection conducted. We have 28 facilities from our list that remain unknowns and are waiting for a final data submittal from one of the inspectors. We have a drop out rate of 75%, With just 55 baseline evaluations completed out of 222 attempted.

Analyze Data and Revise Workbook and Checklist – Omitted. We did not have time to wait for baseline evaluations to be completed. It was necessary to have the printing of the workbook move forward in order to have workshops in July 2007, have facilities perform self-certifications and conduct the second round of facility evaluations before the end of the year.

Prepare and provide technical assistance workshops – Ongoing. Workshops will be conducted in July 2007.

Facilities conduct inspections and submit self-certification – Ongoing. Will take place between July 5, 2007 and September 21, 2007.

Conduct State-to-state ERP Collaboration – Delayed. There is already an ERP Consortium meeting planned for August 2007 and another Innovations Symposium in December 2007. Not sure when a state-to-state ERP meeting in Region 5 would be most beneficial considering those opportunities. We will

consider combining a State-to-State Regional meeting with another ERP Consortium meeting in spring 2008.