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Quarterly Report to USEPA January 1, 2006 – March 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.

	Performance-based EMS permit Milestones	Environmental Results Program Milestones
September 2005	Select participating facilities	Develop performance indicators
	Gather baseline data	Identify universe of sources
	Establish interested parties group	Gather data on administrative effort for
	Establish multi-media team	current compliance or permit activities
December 2005	Provide training on EMS to WDNR staff Provide training for interested parties	Develop workbook and inspection checklists
	group and facilities on roles and responsibilities	Database development Develop statistical methodology
March 2006	For participating facilities establish environmental goals and measures	Conduct inspector training

Grant funds supported the participation of the EMS Permit and ERP Principal Investigators at the January 2006 State-EPA Symposium on Environmental Innovation and Results in Denver, Colorado.

Performance-Based Environmental Management System Permit

A draft permit template is under development by the EMS Permit Working Group. Three of seven sections have been drafted and conceptual discussions have been initiated to determine a mutually agreeable approach in setting permit conditions.

<u>Participants</u> - 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.

<u>Baseline Data</u> - 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.

<u>Interested Parties Group</u> - Ongoing. Questionnaire developed to obtain baseline data on satisfaction with public participation process used in Wisconsin's traditional permit program.

<u>Multimedia Team</u> - Ongoing. Serigraph Inc. applied for Green Tier in February. This activated the cross-media communication procedures of Green Tier including preparing a scope statement for the project and providing it to appropriate WDNR managers.

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

Roles and Responsibilities Training - This training will be delayed until a decision is made as to how to establish interested persons groups.

<u>Establish Environmental Goals and Measures</u> - Ongoing. Serigraph and Arandell began work on establishing environmental aspects and impacts and setting objectives and targets as they develop their EMS's.

Environmental Results Program

<u>Performance Indicators</u> - Ongoing. Draft Environmental Business Practice Indicators (EBPI) have been developed by the ERP Working Group.

<u>Identify Universe of Sources</u> - 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.

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

<u>Develop Workbook and Checklist</u> - Ongoing. Much of the work on individual workbook chapters is complete. The workbook includes chapters on air emissions, hazardous waste, wastewater, stormwater, spills prevention and response, emergency planning, and pollution prevention see http://commerce.wi.gov/BD/BD-CA-ERP.html. Our professional editor simplified content with the assistance of technical experts from each environmental program involved to ensure intent of requirements was not lost. The air emissions chapter is linked to a registration operation permit that will be available to some of the participating printer facilities. Workbook completion has been delayed pending registration permit development. Based on the current content of the workbook a draft self-certification checklist has been developed.

<u>Develop Database and Statistical Methodology</u> - 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. We have received assistance from Mike Crow of Cadmus Group in developing our statistical methodology.

<u>Conduct Inspector Training</u> - Delayed.