

US EPA ARCHIVE DOCUMENT

**Quarterly Report to USEPA
July 1, 2005 – September 30, 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**

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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 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). For larger printing facilities, a performance-based EMS combined with a Title V permit will be developed with several pilot facilities. Included in this quarterly report is a summary of the progress achieved on the 1st quarter milestones identified in the June 30, 2005, final project narrative and work plan (Attachment 1):

Performance-based EMS Permit Milestones - select participating facilities, gather baseline data, establish interested parties group and establish multimedia team.

Environmental Results Program Milestones - develop performance indicators, identify universe of sources, gather data on administrative effort for compliance and permit activities.

The Quality Assurance Project Plan (QAPP) will be revised and submitted for review in advance of any data collection. Our current plan is to develop a separate QAPP for each approach beginning with the ERP. The ERP revision would commence in January 2006. The revised QAPP for the performance-based EMS permit would likely begin in May 2006.

Performance-Based Environmental Management System Permit

The EMS Permit Pilot Project has been moving steadily forward since July. Two working groups have been formed; an advisory group made up of representatives from the printer trade associations and WDNR staff which holds monthly conference calls and a working group that includes the EMS Permit pilot facilities and WDNR staff. The working group generally meets bimonthly via conference call with face to face meetings approximately every other month. Regular communication with Region 5 occurs and WDNR participates in the state EPA EMS and ERP conference call lead by Beth Termini, OPEI, which brings together other states working on similar projects.

Pilot participants - Four printing facilities are participating in the EMS permit pilot project. None of the facilities has a functioning EMS yet but two are close. One facility has applied for Tier I of Wisconsin's Green Tier Program.

Gather baseline data - Baseline data has not been completely identified and no data collection has been initiated. The working groups have made a preliminary identification of the baseline information of interest. With funding provided by OPEI, Ross and Associates reviewed and made recommendations on the current evaluation approach evaluated in August that discussed what baseline data to gather in several conference calls with both the pilot facilities and the advisory group. We have also received a report from Ross Associates which is very helpful on deciding how to move forward with measurement

and data gathering. We will be partnering with Colorado which is farther along in their EMS Permit process to ensure that we build upon the lessons they have learned.

Establish interested parties group - Each pilot facility will develop a public involvement plan. At this time, we feel that facilities need to get farther along in the process before they will be comfortable establishing interested parties groups. We have had a public involvement consultant come and speak with facilities on the basics of a plan, what might be involved in such a plan, and what the benefits are. The pilot facilities also heard from one of Wisconsin's ECPP facilities on the great benefits they have enjoyed by establishing public involvement group early in the process. We are continuing to work in this area.

Establish a multimedia team - WDNR's Waste Management Director and with staff from Wastewater program were involved in our SIG grant project kick off meeting, however, at this time, the EMS Permit side of the project is focusing on air issues. As the pilot facilities get further along in their EMS's we can identify the cross media impacts that the facilities want to include in their permits. One pilot facility has mentioned working with the municipalities to get similar waste water discharge requirements. Another facility has identified waste water discharges as a significant impact.

Environmental Results Program

A working group of printing sector representatives and WDNR and WDCOMM staff has been formed to begin identifying indicators, developing compliance assistance workbook content, and establishing the universe of sources to be included in the project.

Identify universe of sources – Data from two state agencies is needed to compile an accurate list of printing facilities in the state. A signed agreement with the Wisconsin Department of Revenue will be needed to access the North American Classification System (NAICS) reported by business on tax forms. A Limited-Term Employee (LTE) funded under the grant has been assigned this task which is scheduled to be completed by December 2005. The universe of sources we are seeking includes all printers that have annual actual emissions of any criteria pollutant less than 25 tons. The data bases we are using will not have air emissions so surrogate data e.g. number of employees, sales will be used to prepare an initial list. The intent is to use surrogates to develop an initial list that is broader that will be refined in future contacts.

Develop workbook and checklist - This milestone is on schedule given the current status of individual chapters and the assistance of a publications editor hired as a subcontractor with grant funds. It is expected that a draft compliance assistance workbook will be completed and ready for testing with a few printing facilities by January 2006.

Develop performance indicators – In the course of workbook development potential business practice indicators have been discussed however no formal effort has begun. A draft set of performance indicators for program participants should be available by December 2005 when the draft compliance assistance workbook is complete.

Gather data on administrative effort – Preliminary discussions within the WDNR have occurred on the data that would be helpful to characterize the state government compliance effort. Now that we have agreed upon a set size of facilities to be included there may be difficulties gathering data. Printers with emissions less than 25 tons per year are not usually permitted or inspected, except in the nonattainment area where that has been the major source level. A plan is needed to gather data for all regulatory programs involved as well as to identify the effort expended by the printing facilities involved in the program. Now that we have agreed upon a set size of facilities to be included, I believe that we may run into difficulties gathering data.

ATTACHMENT 1

QUARTERLY REPORTING MILESTONES AND SCHEDULE

Final Project Narrative – June 29, 2005

	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 Workplan Establish compliance methodology	Evaluate and revise QAPP and Workplan Perform baseline inspections
September 2006	Obtain data on satisfaction with new public participation process Initiate development of draft permits Identify multimedia impacts	Analyze data and revise workbooks and inspection checklists
December 2006	Issue performance-based permits Evaluate the permit review process	Prepare and provide technical assistance workshops
March 2007		Facilities conduct inspections and submit self-certification Conduct State-to-state ERP Collaboration
June 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
September 2007		Perform post certification inspections
December 2007	Collect second round of data for participating and control facilities	Prepare evaluation that compares data from post-inspections to pre-inspections and self-certifications concerning performance goals – make revisions to targeted issues and other materials as needed
March 2008	Independent project evaluation is completed.	
June 2008	Complete and submit case study report including summary of project, reductions achieved, cost analysis, problems and lessons learned.	