

US EPA ARCHIVE DOCUMENT

VEEP Integration Project

DEQ Program Follow-up Manager Survey Results

Richmond, Virginia
October 19, 2009

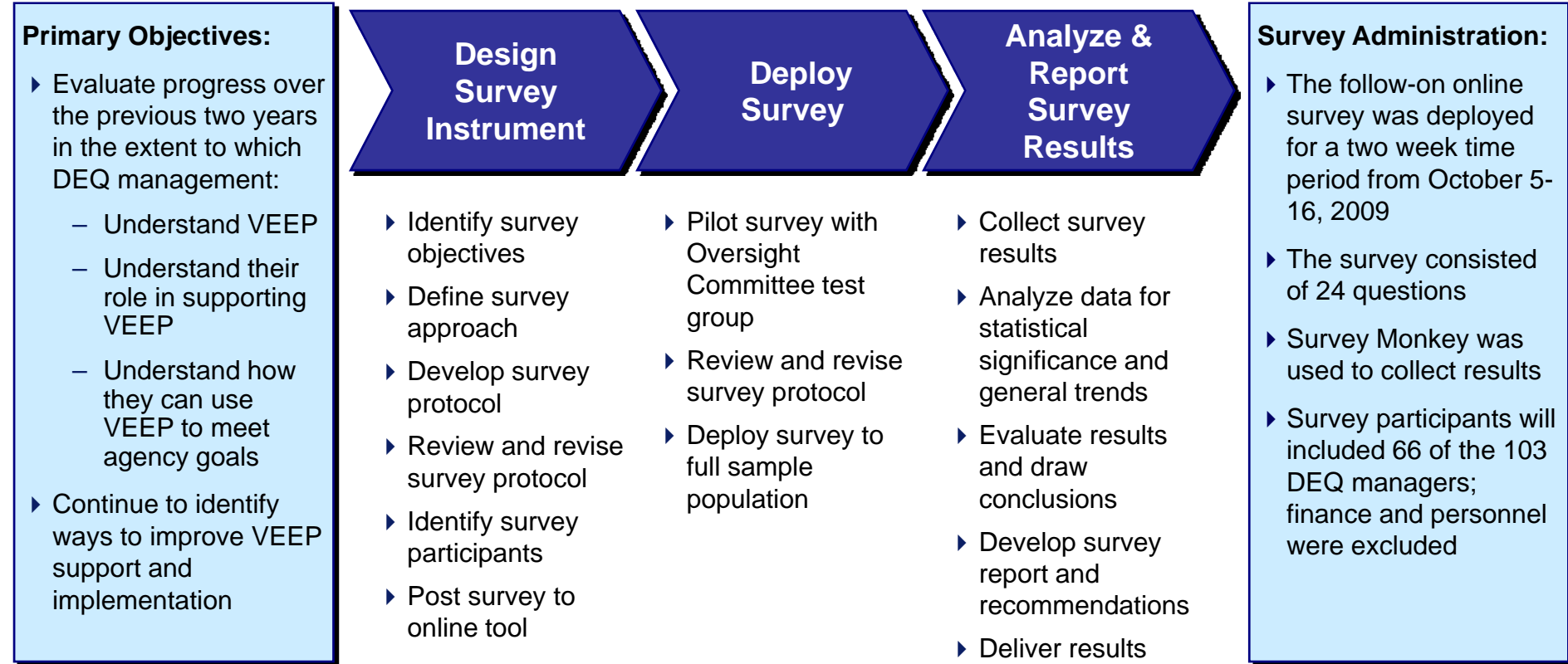
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- ▶ Executive Summary
- ▶ DEQ Program Manager Survey Analysis

In October 2009, Booz Allen conducted a follow-up survey of DEQ managers to measure improvements in understanding and support of VEEP over a two year time period

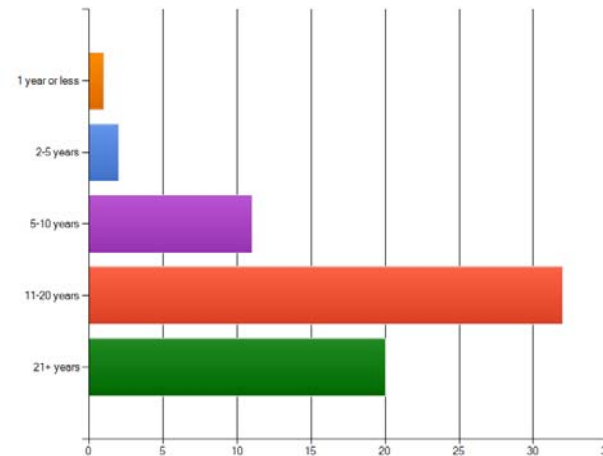
▶ Responsible: Booz Allen
 ▶ Consulted: Sharon Baxter, Oversight Committee



64% of eligible managers responded to the VEEP survey; respondents represent a wide array of roles, regions and experience at DEQ

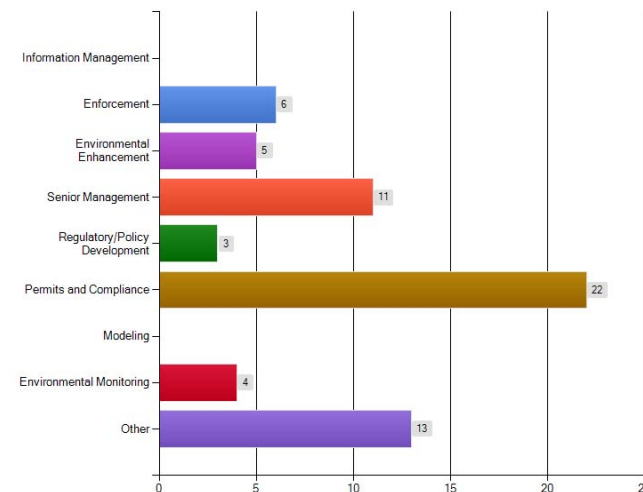
- ▶ 64% (66/103) of eligible managers responded to the VEEP survey.
- ▶ 79% (52/66) of respondents have been with DEQ for 11+ years.
- ▶ 85% (55/66) of respondents have worked in their current position for 24+ months.

Breakdown of Responses by Years w/ Organization



- ▶ 34% (22/66) of respondents work with Permits and Compliance.
- ▶ 47% (29/62*) of respondents are located in the central office; 53% (33/66*) of respondents are located in regional offices.
- ▶ Responses are comprehensive offering a cross section of DEQ roles and responsibilities.

Breakdown of Responses by Role in Organization



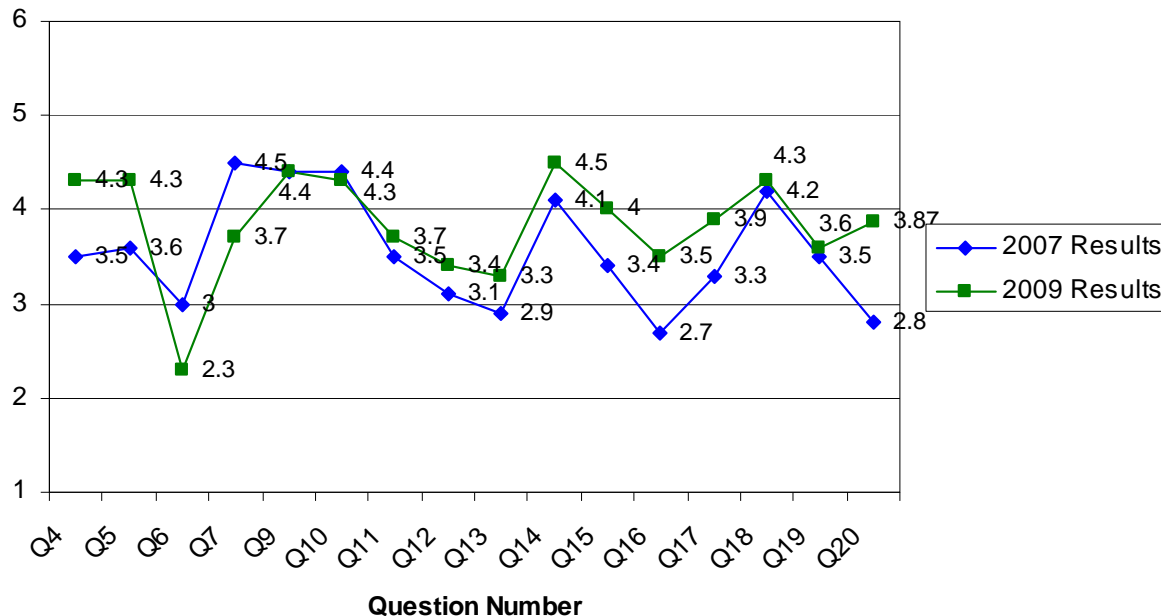
* Denominators used in survey results are the number of respondents to the question, not

Data shows that DEQ Managers' understanding, support and participation in VEEP has increased over the last two years in nearly every area

Key Observations

- ▶ Managers feel significantly more prepared with the materials and information they need to promote VEEP to potential participants than in 2007 [see question 20]
- ▶ Managers displayed more knowledge about VEEP through test questions in which a higher percentage correctly identified factors of an EMS and rejected the perception that VEEP participants are able to reduce their compliance requirements
- ▶ Many managers feel more comfortable explaining the incentives and rewards available for VEEP participants than in 2007

Comparison of 2007 to 2009 Mean Survey Results



Question Guide

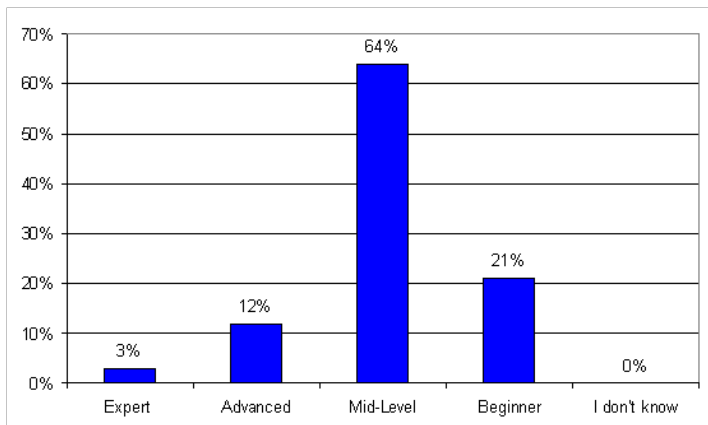
Q4	I have a good understanding of the criteria for participation in VEEP
Q5	I have a good understanding of the incentives and rewards available for VEEP participants
Q6	After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements
Q7	The compliance criteria for participation in VEEP is different at each level
Q9	I believe that VEEP is having a positive impact on the environment
Q10	Improving participation in VEEP is important to me
Q11	The current VEEP incentives are sufficient to motivate businesses to participate in the program
Q12	Increasing the number of VEEP participants will create more work for me and my staff
Q13	I have significant influence over whether or not a facility is admitted into the VEEP program
Q14	Promoting participation in VEEP is part of my job at DEQ
Q15	I actively encourage eligible facilities to participate in VEEP
Q16	I feel comfortable explaining the incentives and rewards available for VEEP participants
Q17	I feel comfortable promoting VEEP to potential participants
Q18	I feel there is more I could do to promote VEEP to potential participants
Q19	VEEP can help me meet my program goals
Q20	I have the information and materials I need to promote VEEP to potential participants

Most DEQ managers now have a fairly solid understanding of VEEP and associated rewards/incentives

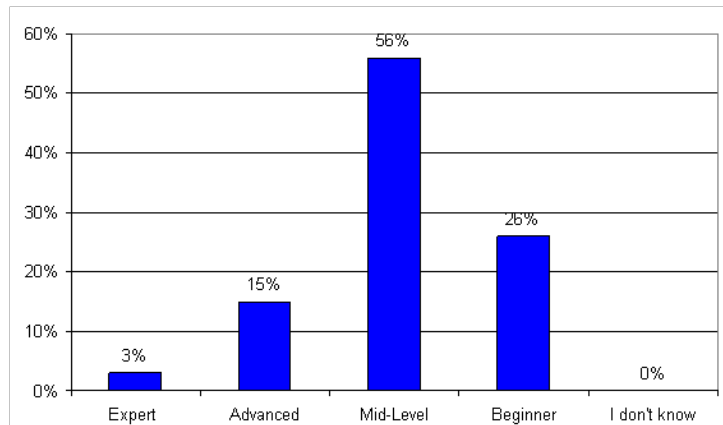
Key Observations

- Most managers feel that they have a mid-level understanding of Environmental Management Systems (EMS) and the Virginia Environmental Excellence Program. Just under 20% feel their understanding is advanced or expert.
- ~18% of respondents falsely believe that VEEP participants are able to reduce their compliance requirements, an improvement over 2007 survey results where 37% falsely believed the same.

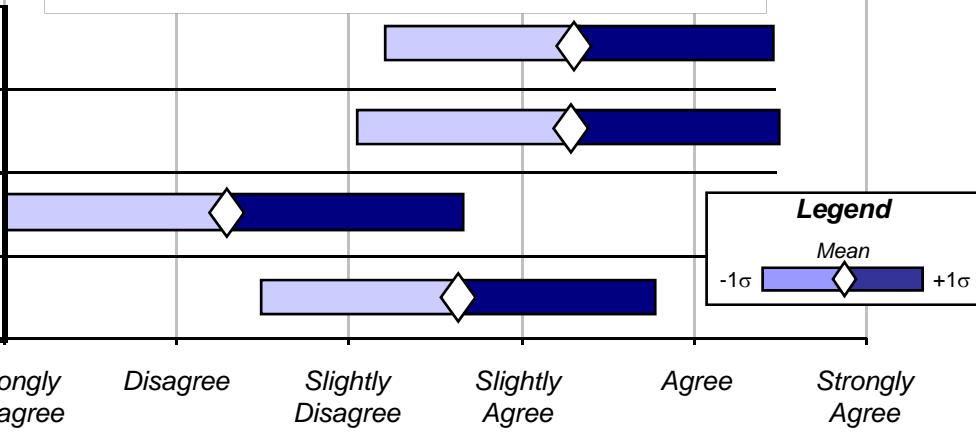
1 My understanding of the Environmental Management Systems (EMS) is: *(Rate from Beginner to Advanced)*



2 My understanding of the Virginia Environmental Excellence Program (VEEP): *(Rate from Beginner to Advanced)*



4	I have a good understanding of the criteria for participation in VEEP <i>(Rate from Strongly Disagree to Strongly Agree)</i>
5	I have a good understanding of the incentives and rewards available for VEEP participants <i>(Rate from Strongly Disagree to Strongly Agree)</i>
6	After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements <i>(Rate from Strongly Disagree to Strongly Agree)</i>
7	The compliance criteria for participation in VEEP is different at each level <i>(Rate from Strongly Disagree to Strongly Agree)</i>



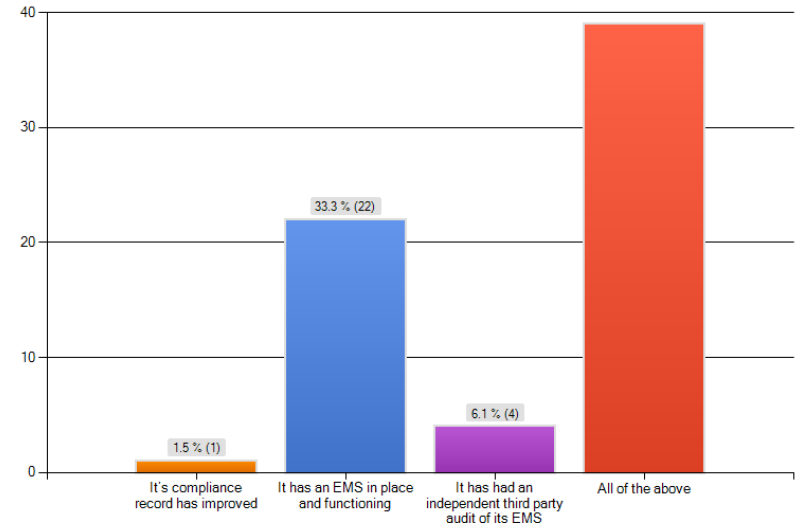
Strongly Disagree Disagree Slightly Disagree Slightly Agree Agree Strongly Agree

Questions 3 and 8, which tested manager knowledge of VEEP, showed improvement from 2007

Key Observations

- 33% of managers correctly identified having an EMS in place and functioning as the criteria to move to the next level in VEEP, up from 18% in 2007
- The number of respondents who got 5 or 6 of the factors correct in question 3 nearly tripled from 2007 to 2009, showing increased knowledge of what must be in place for an organization to have an EMS

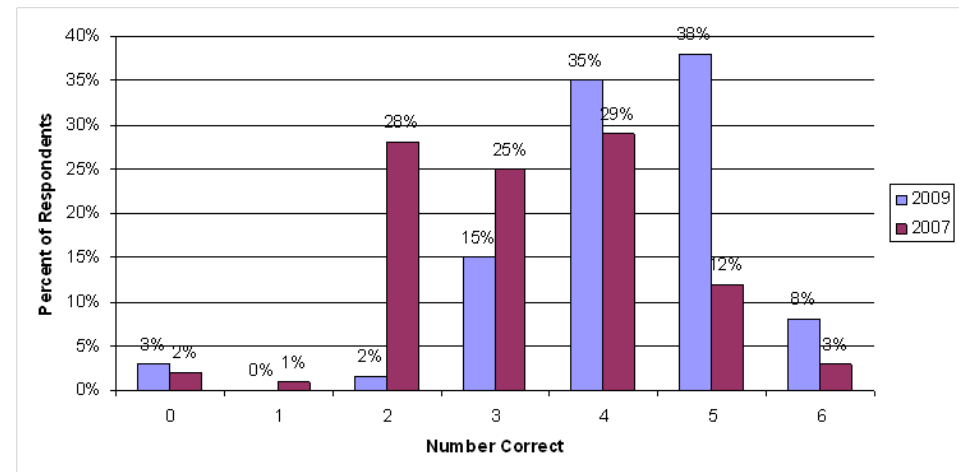
For a facility to move from the E2 to E3 level in VEEP, it must show which of the following:



Question 3: 2009 Response Break Down

Question 3: An Organization with an EMS:		Yes	No	Don't Know
3a	Must have an environmental policy	79	4	4
3b	Must have at least one permit	11	60	16
3c	Must be consistent with ISO 14001	36	26	25
3d	Must be in compliance with all applicable regulations	50	30	6
3e	Must have measurable objectives	80	0	3
3f	Must be consistently improving its performance	67	5	15

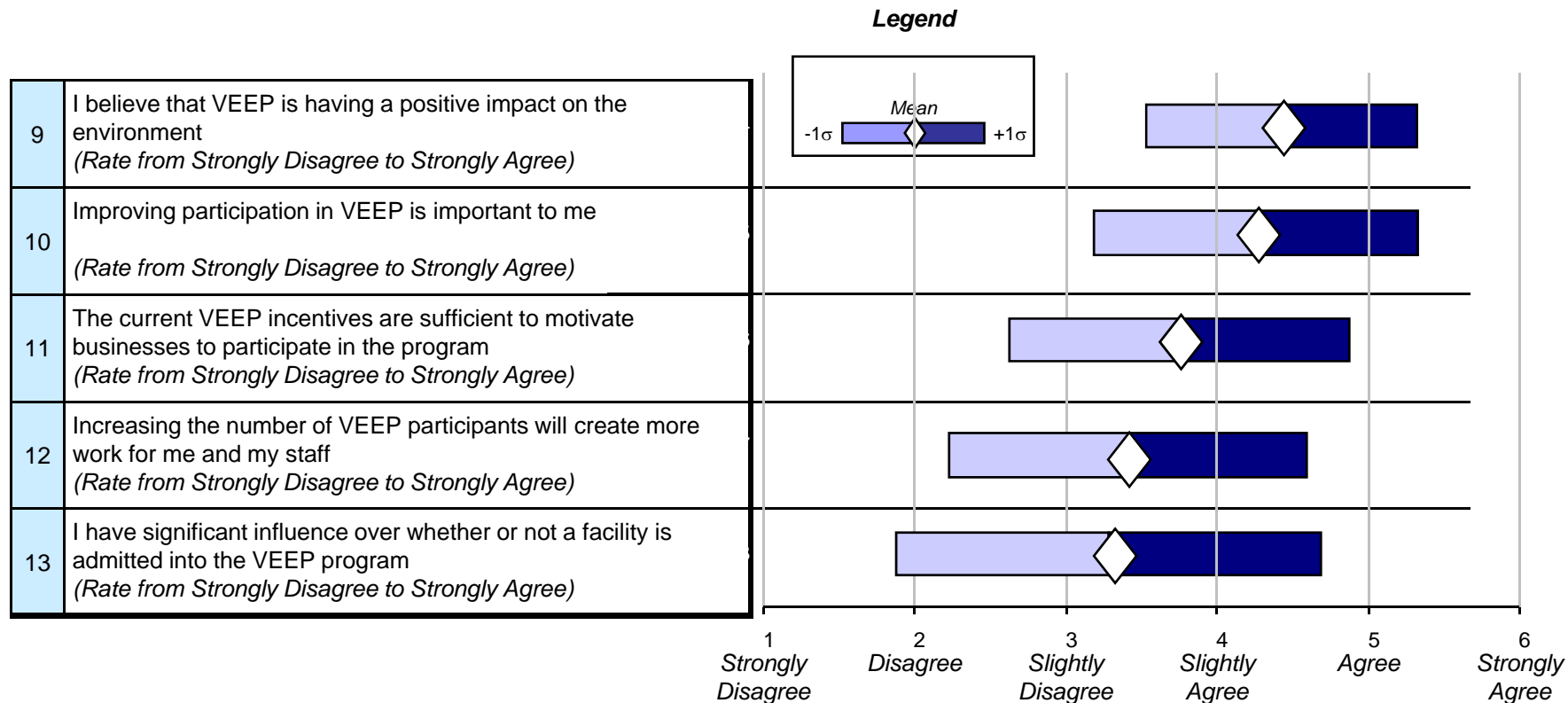
Question 3: 2007 vs. 2009 Correct Responses



Overall, respondents continue to believe VEEP participation is important and has a positive environmental impact, but that it increases their workload

Key Observations

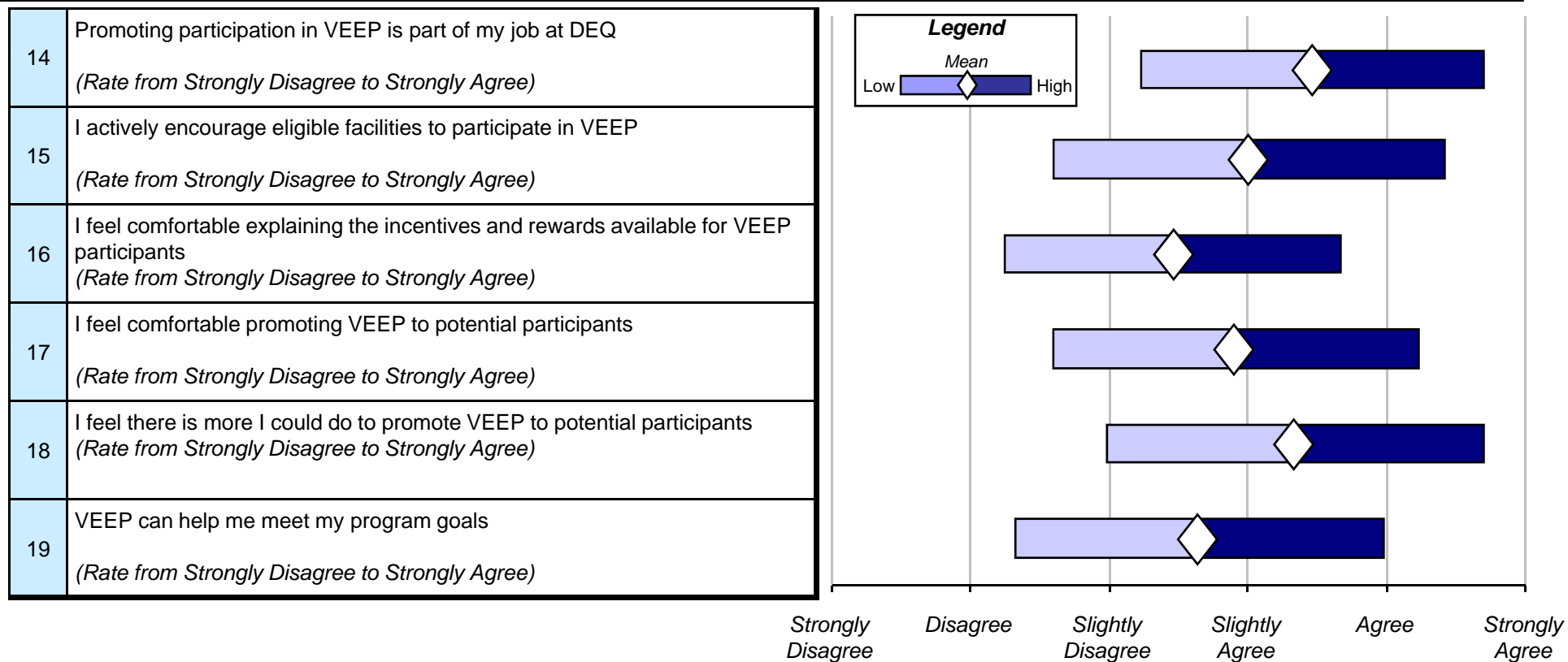
- ~80% of respondents believe VEEP has a positive impact on the environment, down from 86% in 2007
- ~78% of respondents identified VEEP participation as important to them, down from 88% in 2007
- ~72% of managers indicate incentives are sufficient to motivate businesses to participate, however, 17% are uncertain
- Nearly half of managers believe that increasing VEEP participation will also increase their workload and that they have significant influence over whether a facility is admitted to VEEP



Most managers see VEEP promotion as part of their job, but only 52% see how it helps meet program goals; most believe they could promote it more

Key Observations

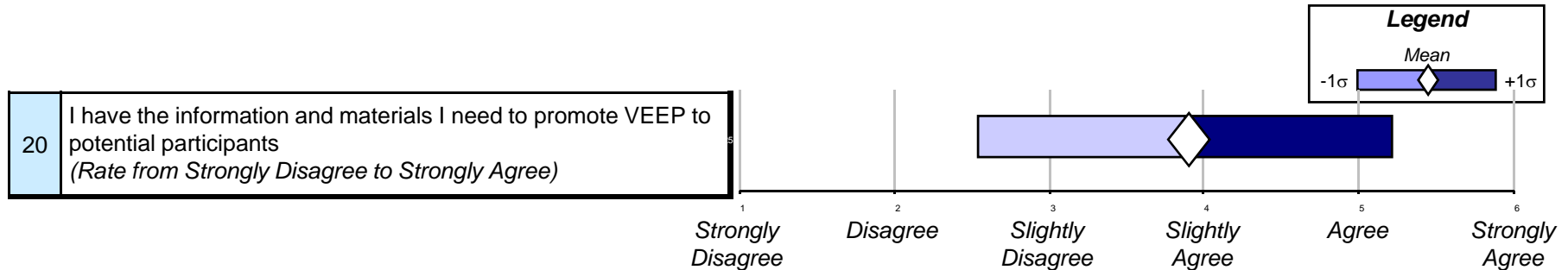
- 80% of respondents understand that promoting VEEP is a part of their job; however ~27 % admit that they do not actively encourage facilities to participate in VEEP
- 77% of respondents believe that there is more they could do to promote the program.
- More than half (~56%) of respondents are comfortable speaking about rewards and incentives associated with VEEP.
- Managers moderately understand customer rewards and incentives; however half of respondents do not believe that VEEP helps them meet program goals.



Managers are much better equipped with the information and materials needed to support and promote VEEP, but 42% still need help

Key Observations

- A majority of respondents (~58%) stated that they have the information and/or materials necessary to support and promote VEEP; 36% do not and 6% are not sure; this is an increase over 2007 when only 33% of managers believe they had the materials and information needed
- The most preferred method of communication is the DEQ intranet, followed by external websites, training sessions and a point of contact/subject matter expert. CEDS is the least preferred.



21 I would like to receive information about VEEP through the following:
(Rank top three from the following)

- ▶ DEQ Intranet
- ▶ External Website
- ▶ CEDS
- ▶ A Point of Contact within DEQ
- ▶ Training
- ▶ Paper/Poster Brochure

Channel	Times 1st	Times 2nd	Times 3rd
External Website	18	14	10
DEQ Intranet	27	4	15
CEDS	6	2	5
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Open-ended comments continue to reinforce a need for case studies, improved processes, yearly training and promotional materials to increase participation in VEEP

Q22: What training or information could you or your staff use to help better promote the VEEP?

- ▶ Information – basic information about the different levels of the program
- ▶ Training - primarily for staff now that managers are trained or on particular areas
- ▶ Printed marketing materials and web links to promote VEEP
- ▶ Case Studies -- examples of incentives offered, real life benefits and by area so that ideas can be applied to like situations

Q23: What reasons do you think businesses have for not participating in VEEP?

- ▶ Don't understand/aren't aware of the program
- ▶ The benefits are unclear/intangible. There is no clear return on investment
- ▶ It is a lot of work
- ▶ Fear that participation will put them on DEQ's radar

Q24: How would you improve the VEEP (include any specific ideas)?

- ▶ More marketing/emphasis on incentives
- ▶ Technology and process improvements to reduce the amount of time it takes to identify/track participation
- ▶ Meet with participants in person and hold regular events to provide high-touch coaching, support and reinforcement
- ▶ Provide model EMS' for people to see and use in developing their own programs

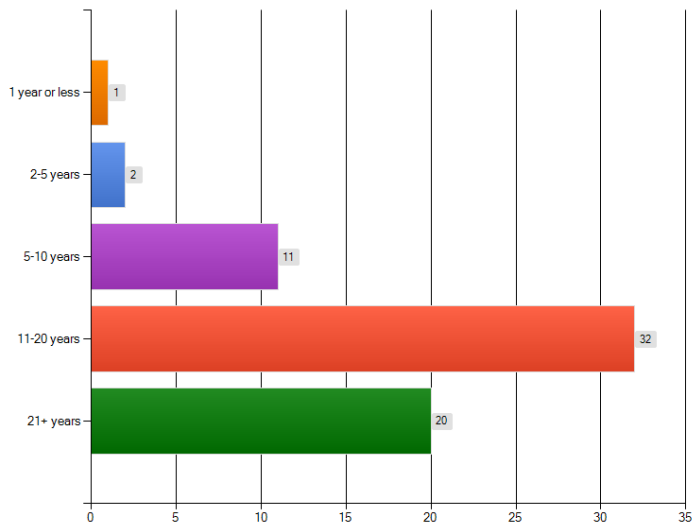
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- ▶ Executive Summary

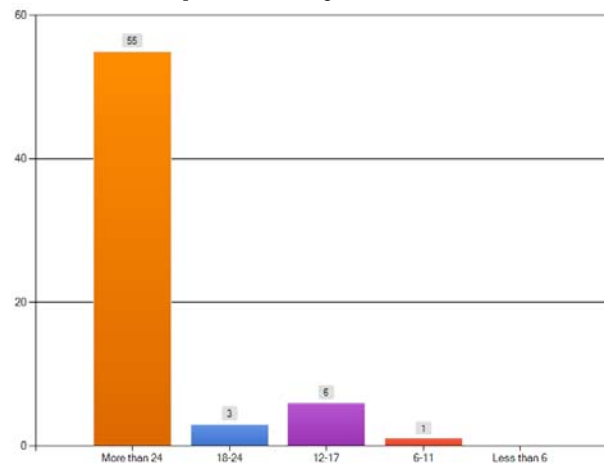
- ▶ DEQ Program Manager Survey Analysis

The survey received an 64% response rate, demographics indicate responses were received from a variety of roles, regions and experience

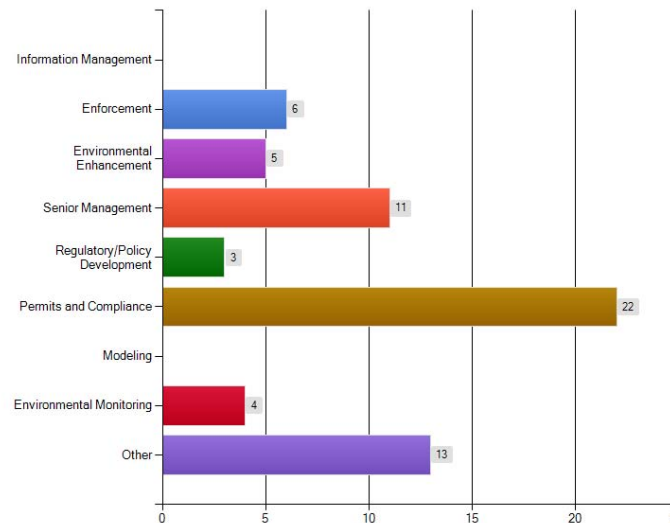
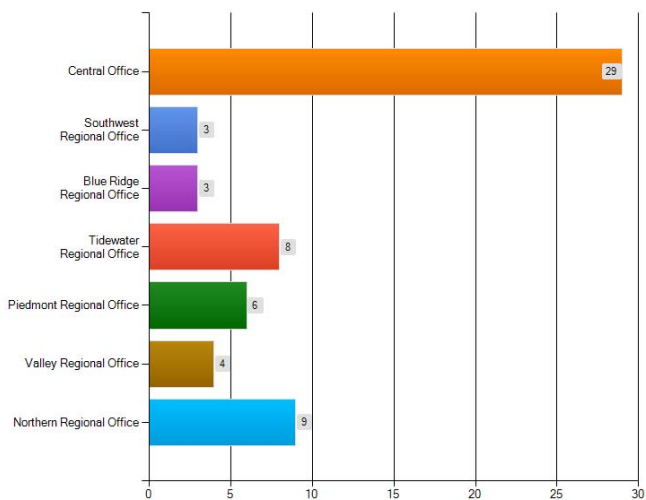
Breakdown of Responses by Years w/ Organization



Breakdown of Responses by Months in Current Position



Breakdown of Responses by Role

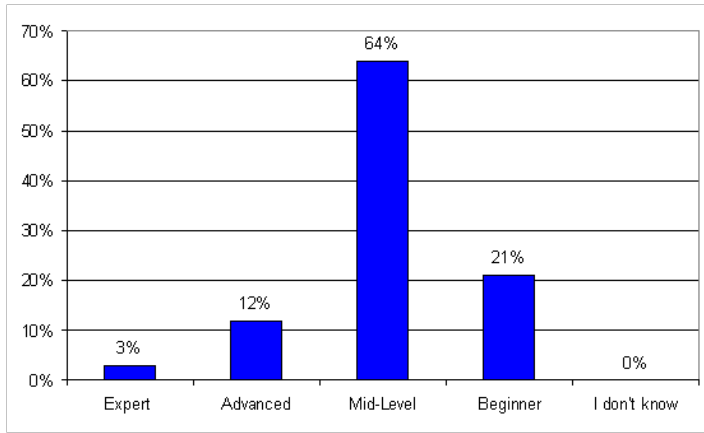


Most DEQ managers have a fairly solid understanding of VEEP and associated rewards/incentives

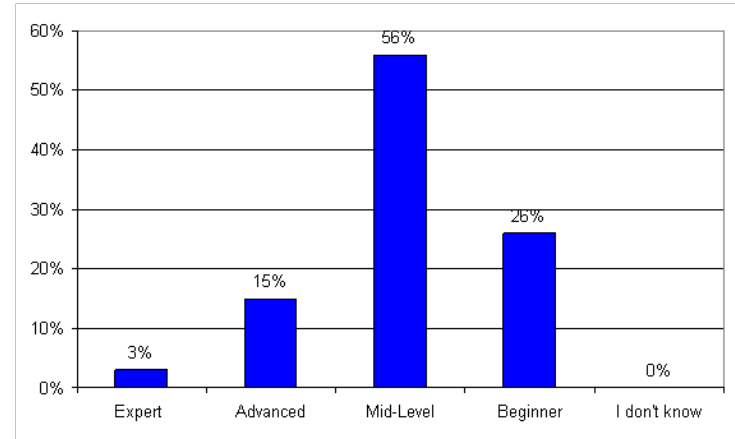
Key Observations

- Most managers feel that they have a mid-level understanding of Environmental Management Systems (EMS) and the Virginia Environmental Excellence Program. Just under 20% feel their understanding is advanced or expert.
- ~18% of respondents falsely believe that VEEP participants are able to reduce their compliance requirements, an improvement over 2007 survey results where 37% falsely believed the same.

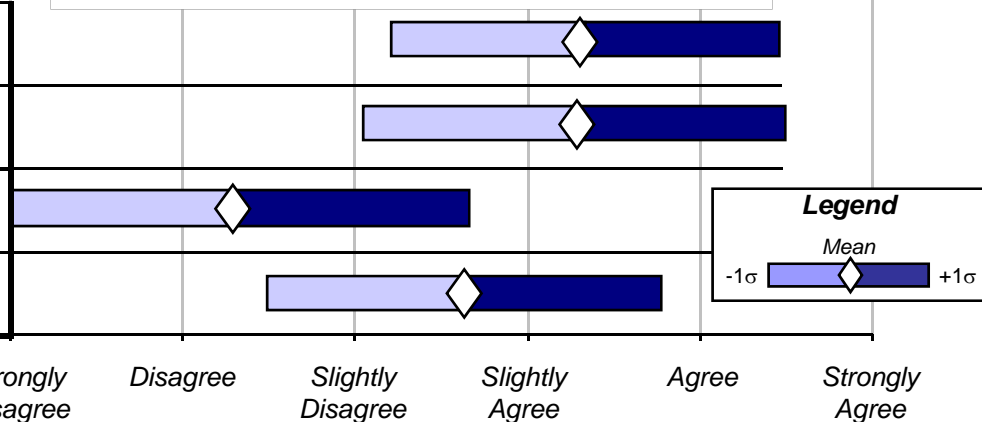
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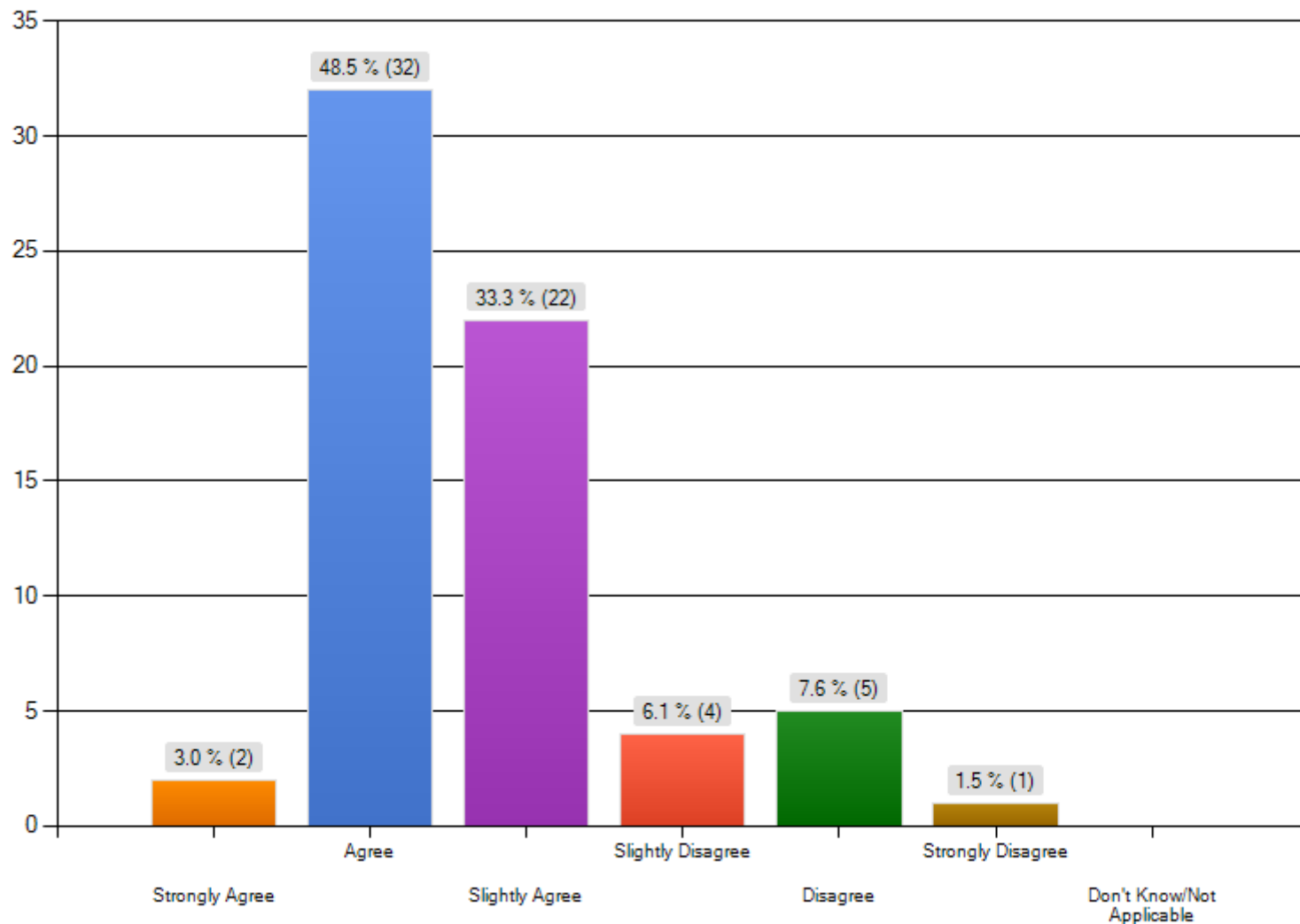


4	I have a good understanding of the criteria for participation in VEEP <i>(Rate from Strongly Disagree to Strongly Agree)</i>
5	I have a good understanding of the incentives and rewards available for VEEP participants <i>(Rate from Strongly Disagree to Strongly Agree)</i>
6	After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements <i>(Rate from Strongly Disagree to Strongly Agree)</i>
7	The compliance criteria for participation in VEEP is different at each level <i>(Rate from Strongly Disagree to Strongly Agree)</i>



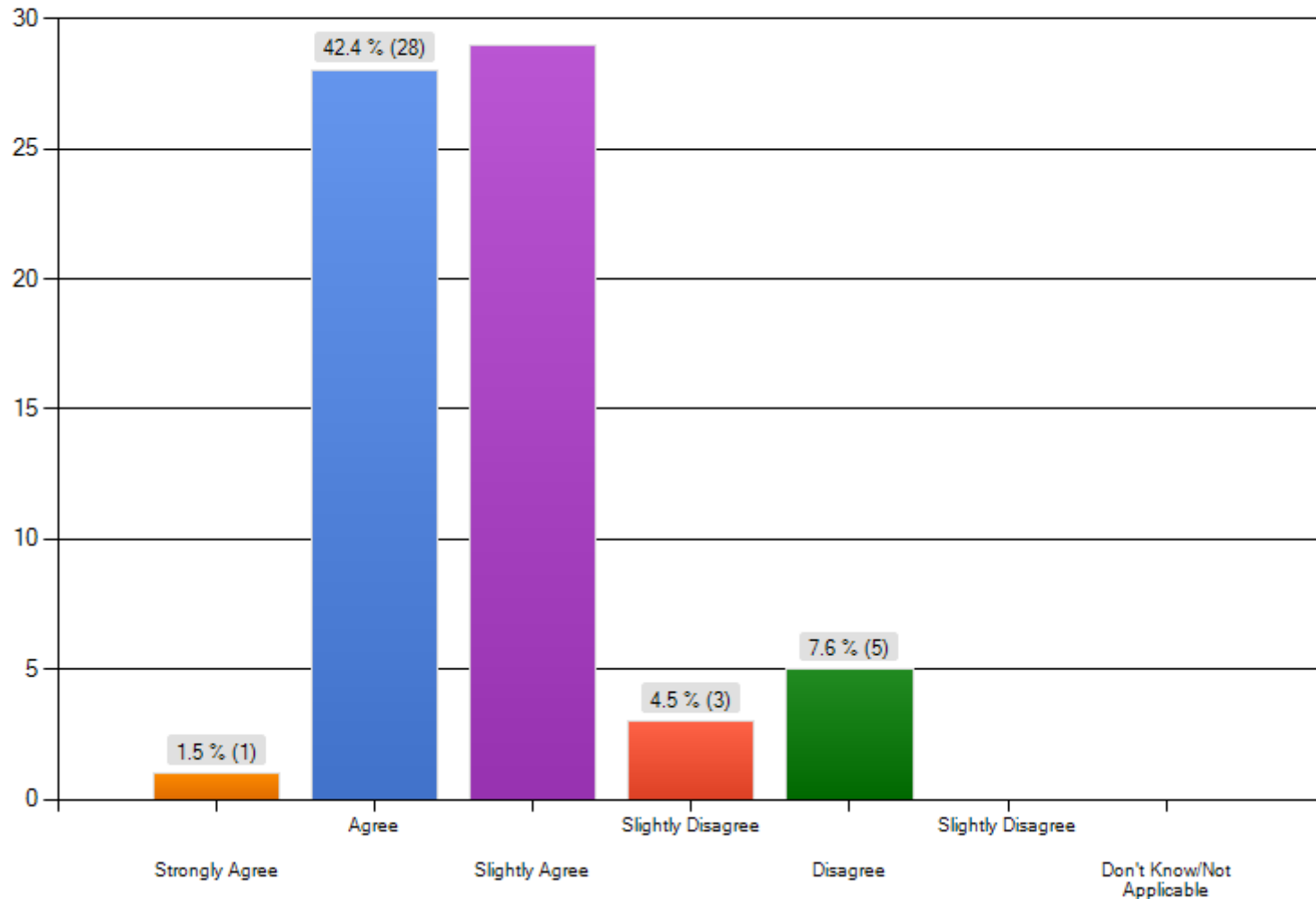
85% of managers indicate that they have a good understanding of the criteria for participation in VEEP

Question 4: I have a good understanding of the criteria for participation in VEEP



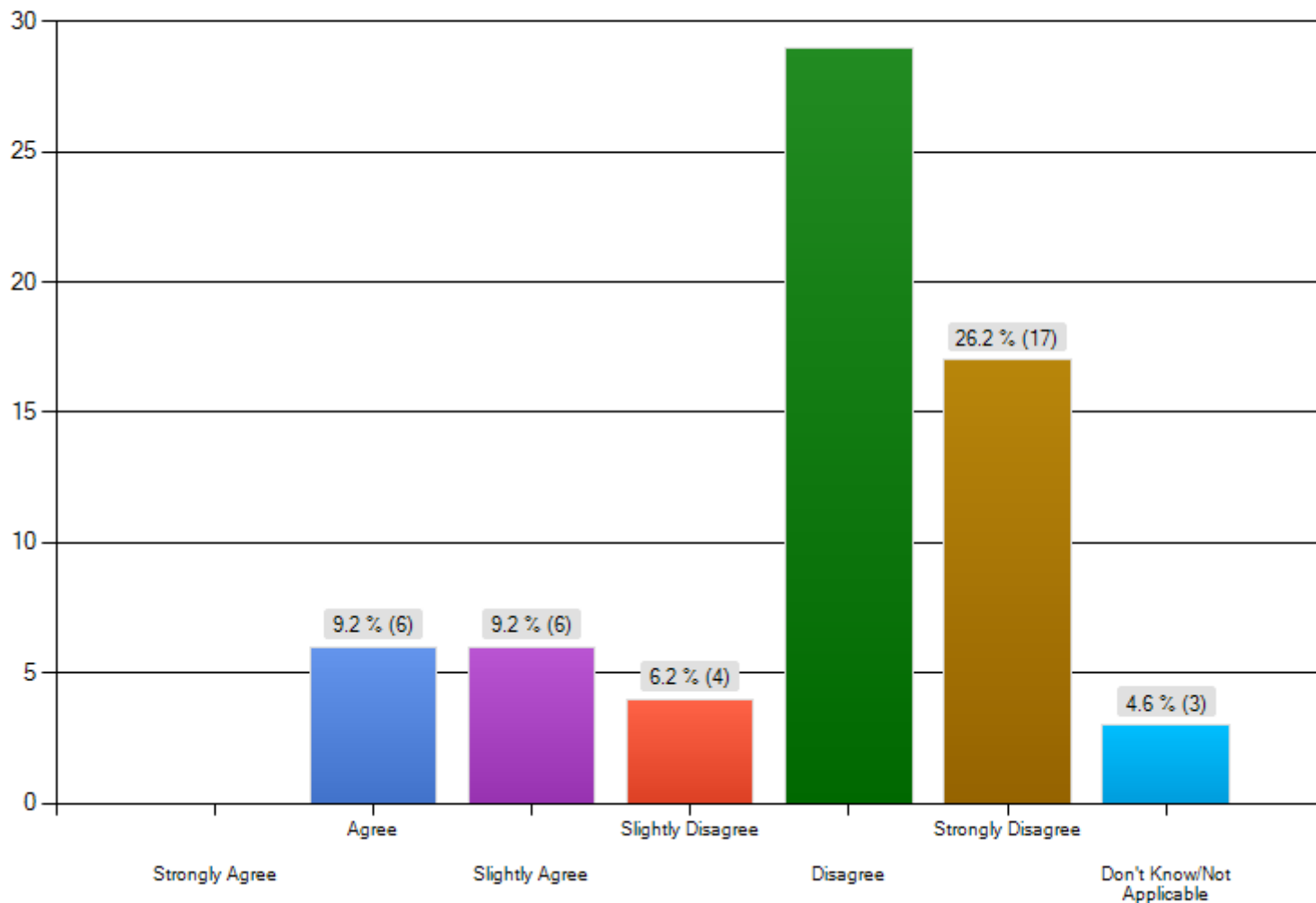
Most managers (88%) also have a good understanding of the incentives and rewards available for VEEP participants

Question 5: I have a good understanding of the incentives and rewards available for VEEP participants



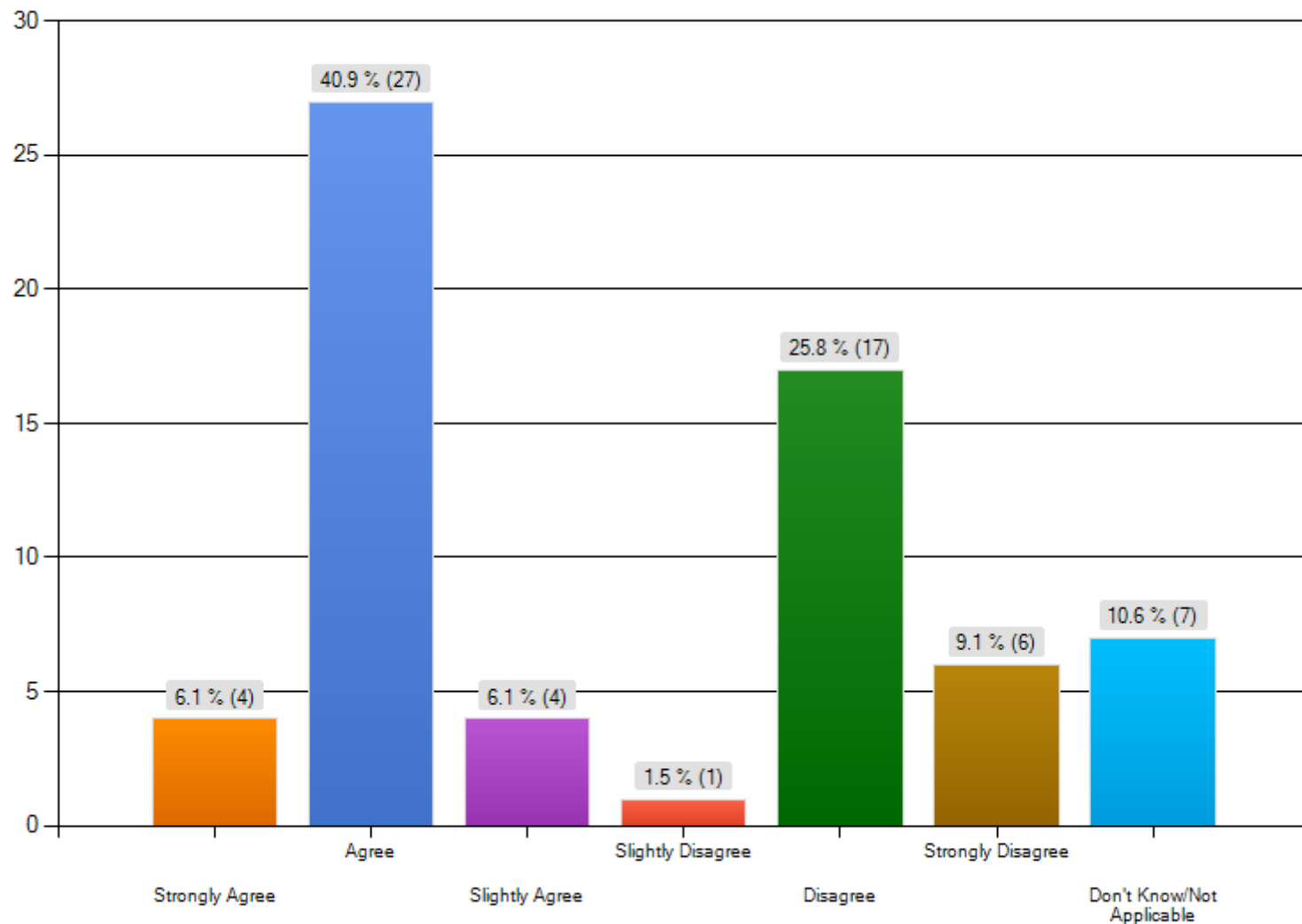
18% of managers falsely believe that after a participant is admitted to VEEP, their compliance requirements are reduced

Question 6: After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements



53% of managers agree that compliance criteria for VEEP is different at each level

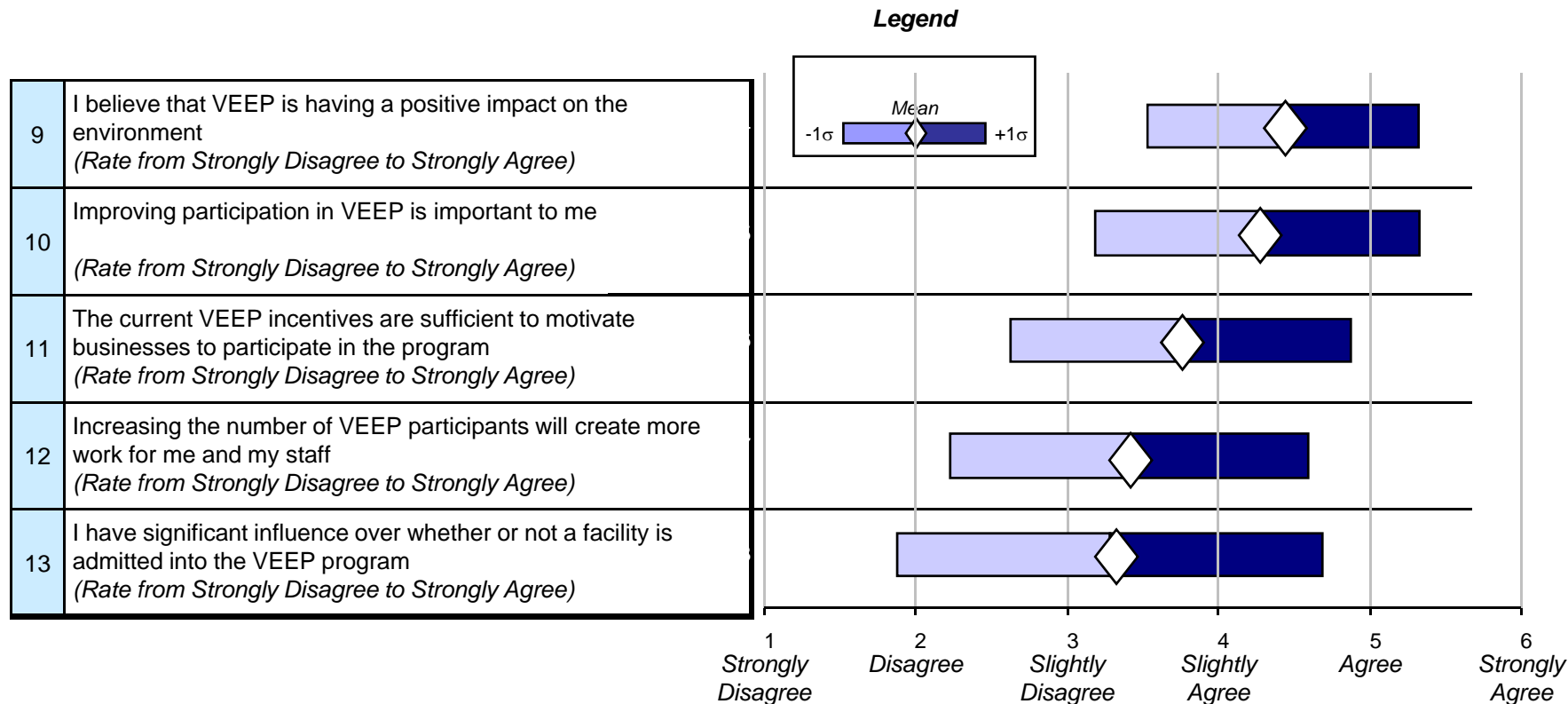
Question 7: The compliance criteria for participation in VEEP is different at each level



Overall, respondents believe VEEP participation is important and has a positive environmental impact, but that it increases their workload

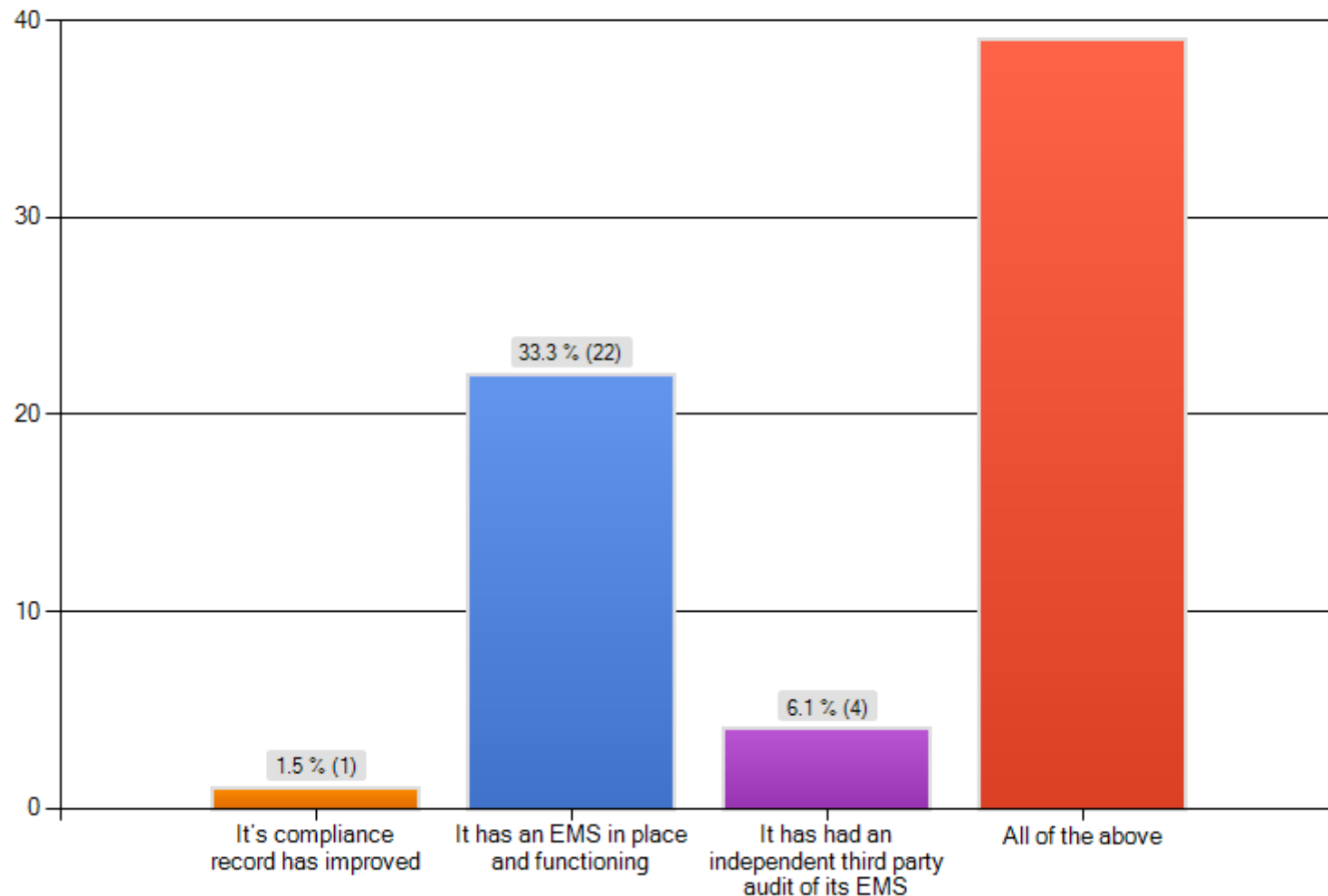
Key Observations

- ~80% of respondents believe VEEP has a positive impact on the environment.
- ~78% of respondents identified VEEP participation as important to them.
- ~72% of managers indicate incentives are sufficient to motivate businesses to participate, however, 17% are uncertain
- Nearly half of managers believe that increasing VEEP participation will also increase their workload and that they have significant influence over whether a facility is admitted to VEEP



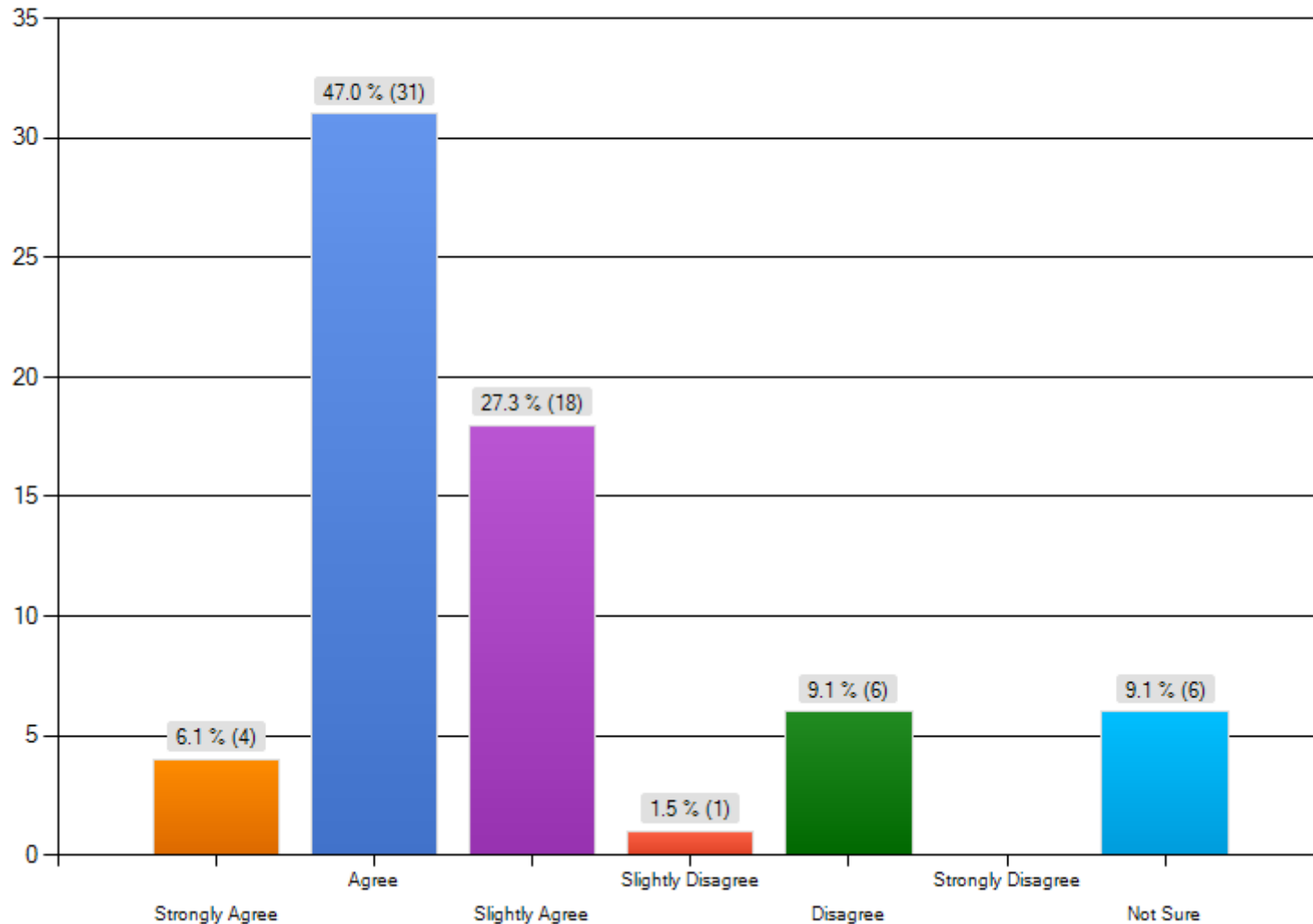
Only 33% of managers correctly identified criteria to move to the next level in VEEP

For a facility to move from the E2 to E3 level in VEEP, it must show which of the following:



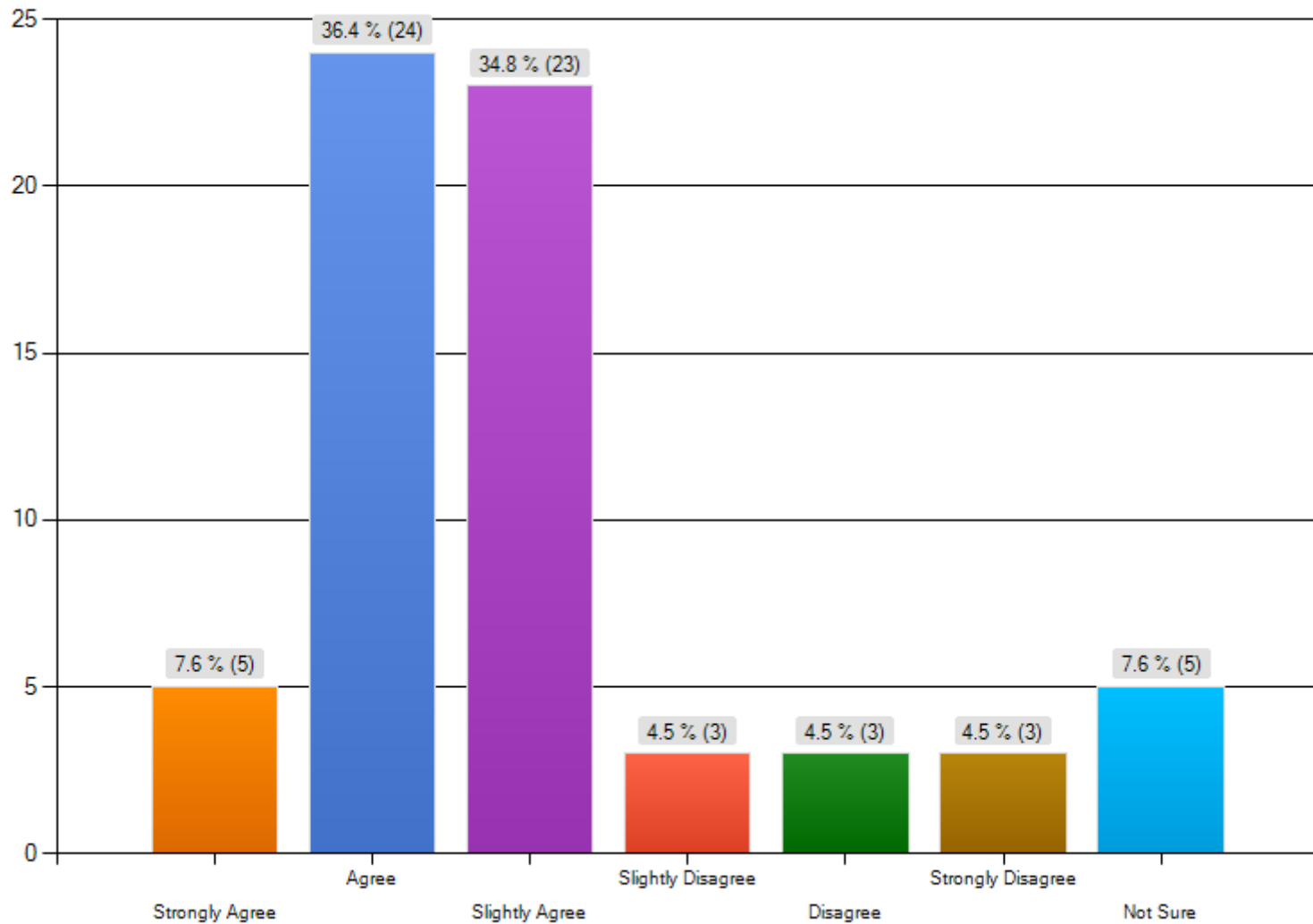
80% of managers believe VEEP is having a positive impact on the environment

Question 9: I believe that VEEP is having a positive impact on the environment



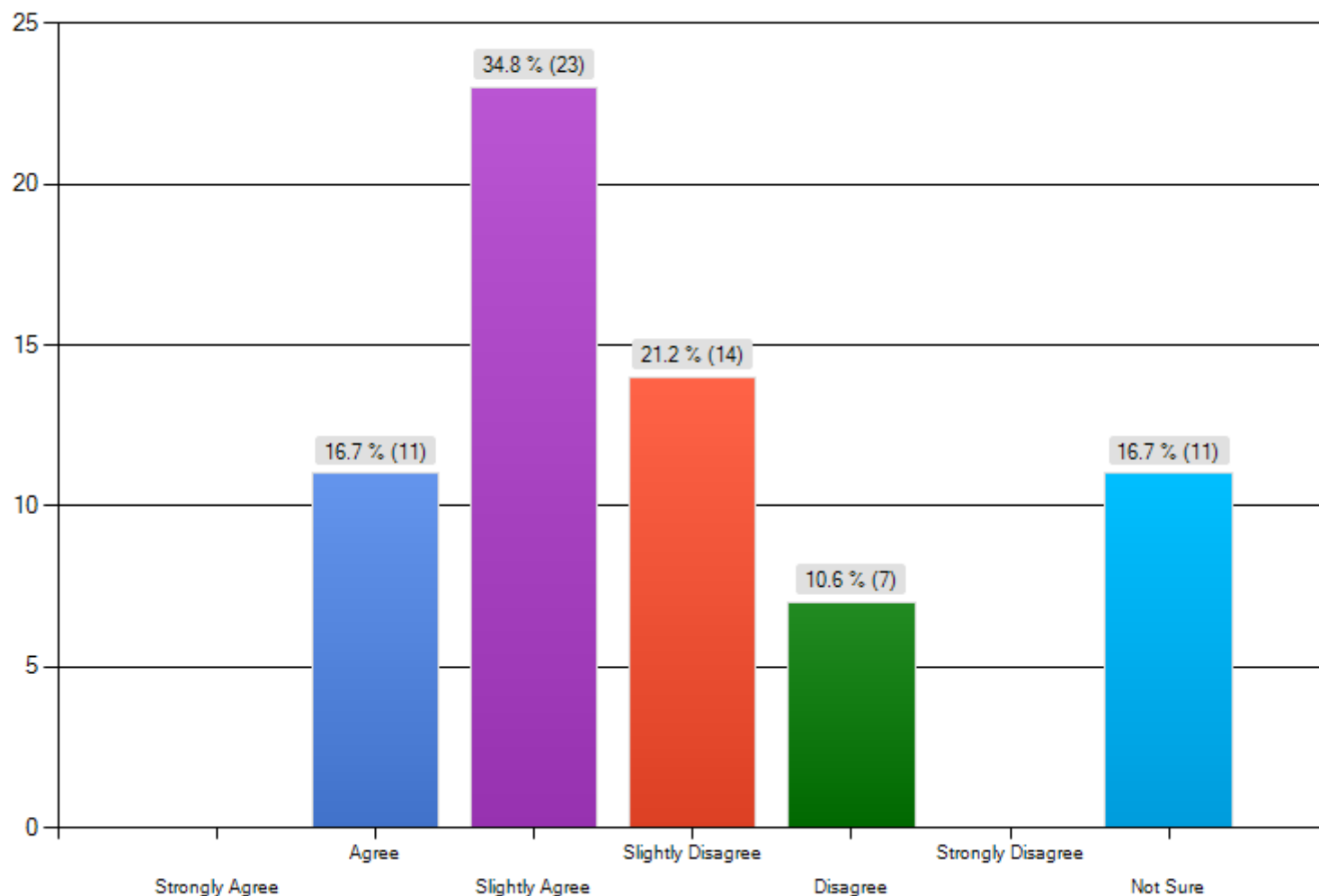
Improving participation in VEEP is important to ~78% of managers

Question 10: Improving participation in VEEP is important to me



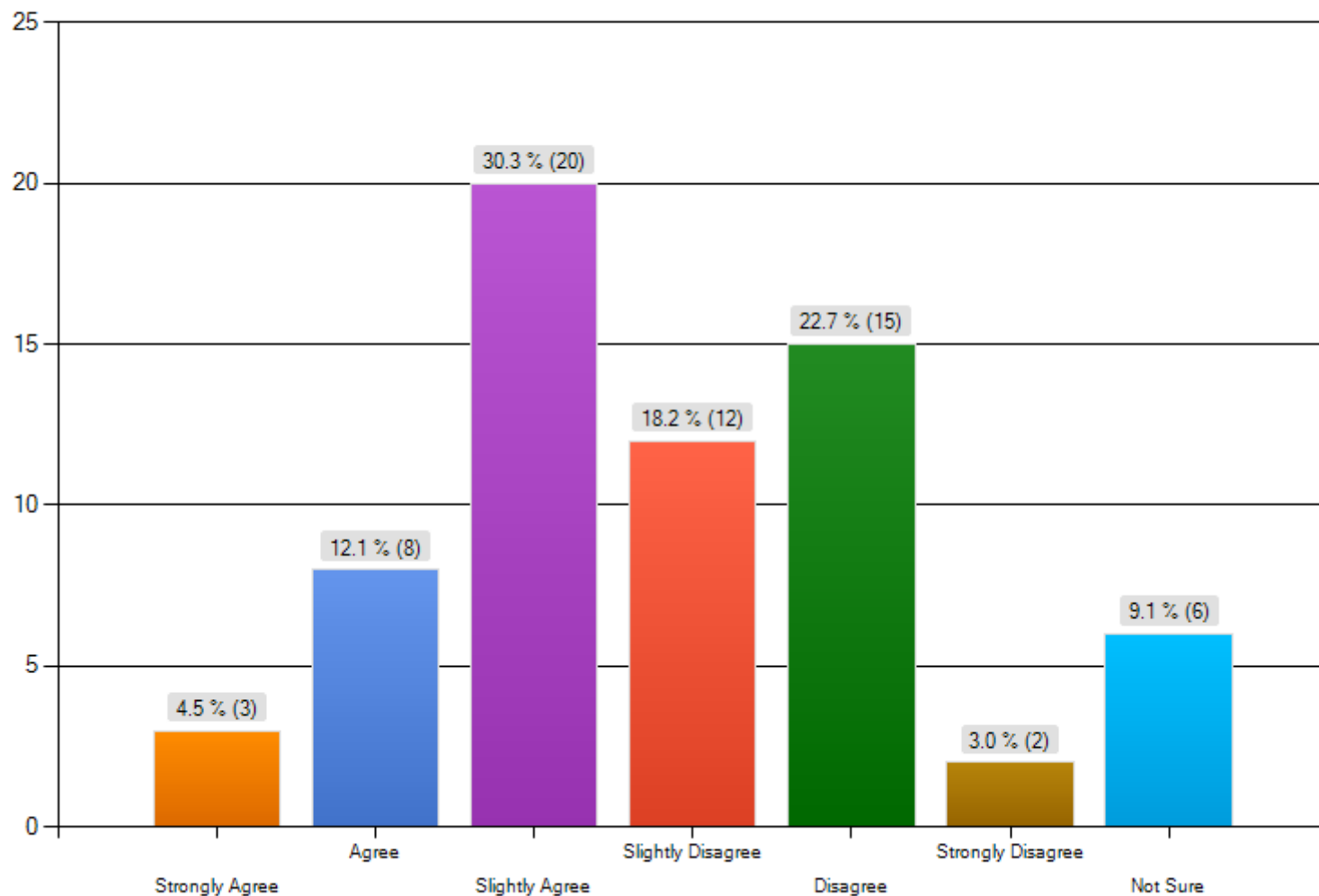
52% of managers feel current VEEP incentives are sufficient motivation to join; 32% disagree and 17% are uncertain

Question 11: The current VEEP incentives are sufficient to motivate businesses to participate in the program



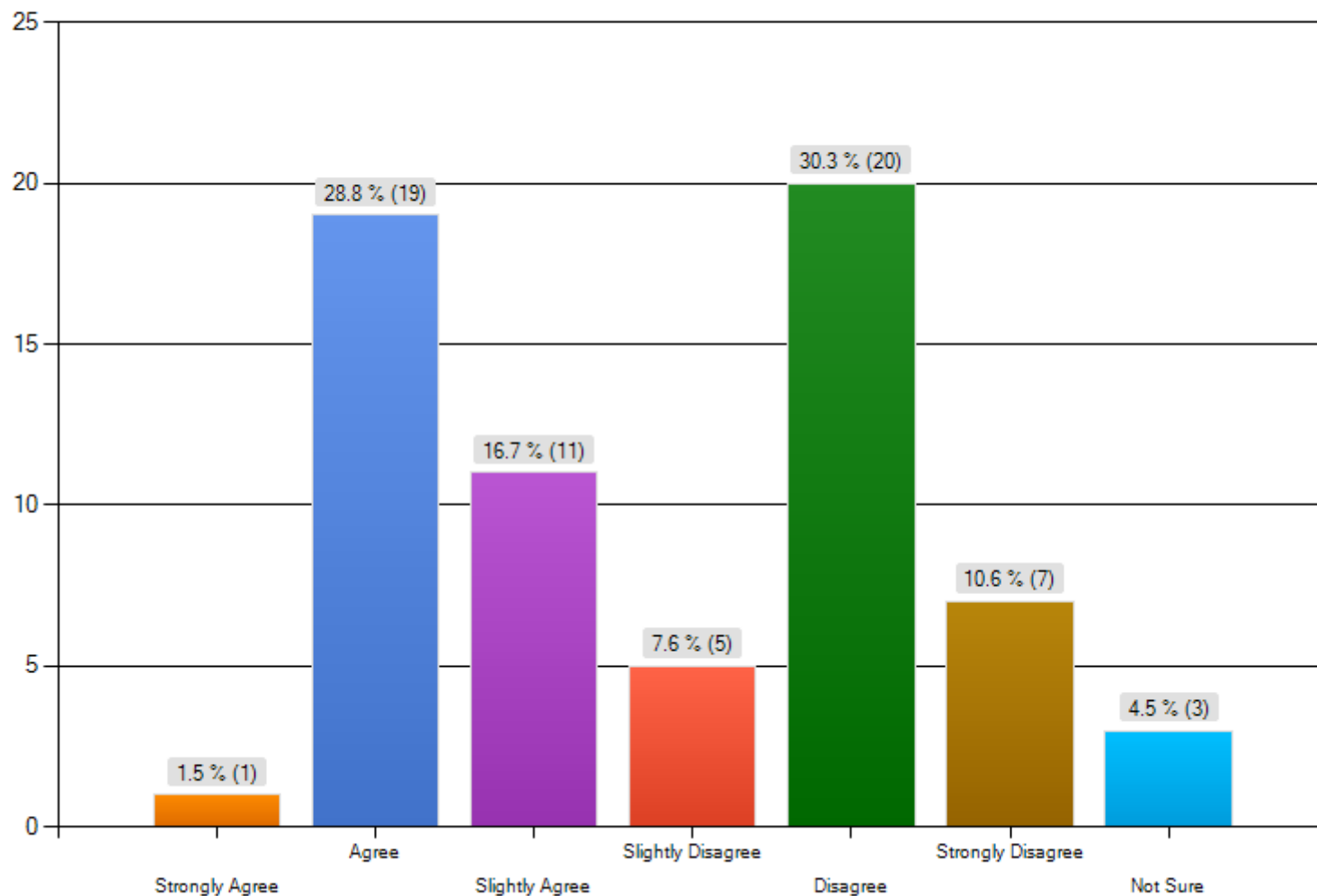
Nearly half of managers (47%) feel increasing VEEP participation will also create more work for them

Question 12: Increasing the number of VEEP participants will create more work for me and my staff



47% of managers believe they have significant influence over whether or not a facility is admitted into the VEEP program

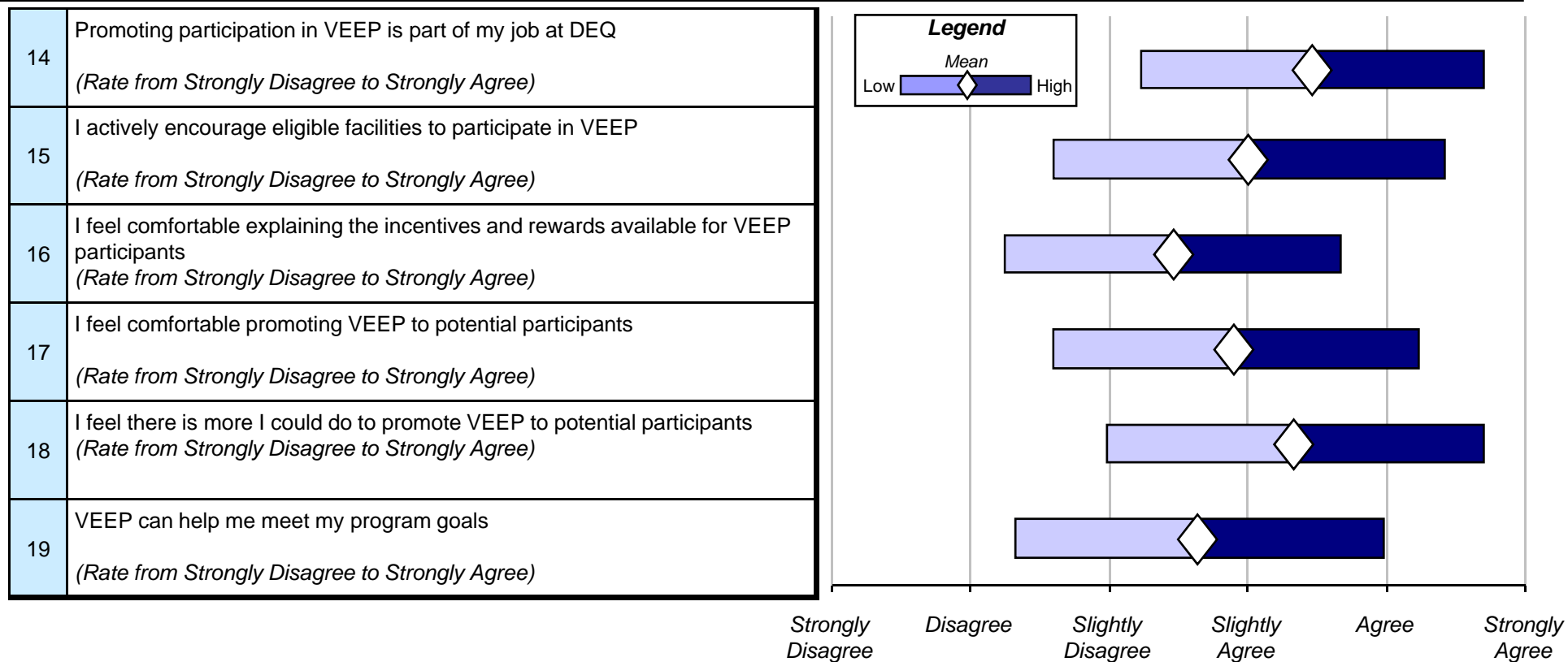
Question 13: I have significant influence over whether or not a facility is admitted into the VEEP program



Most managers see VEEP promotion as part of their job, but only 52% see how it helps meet program goals; most believe they could promote it more

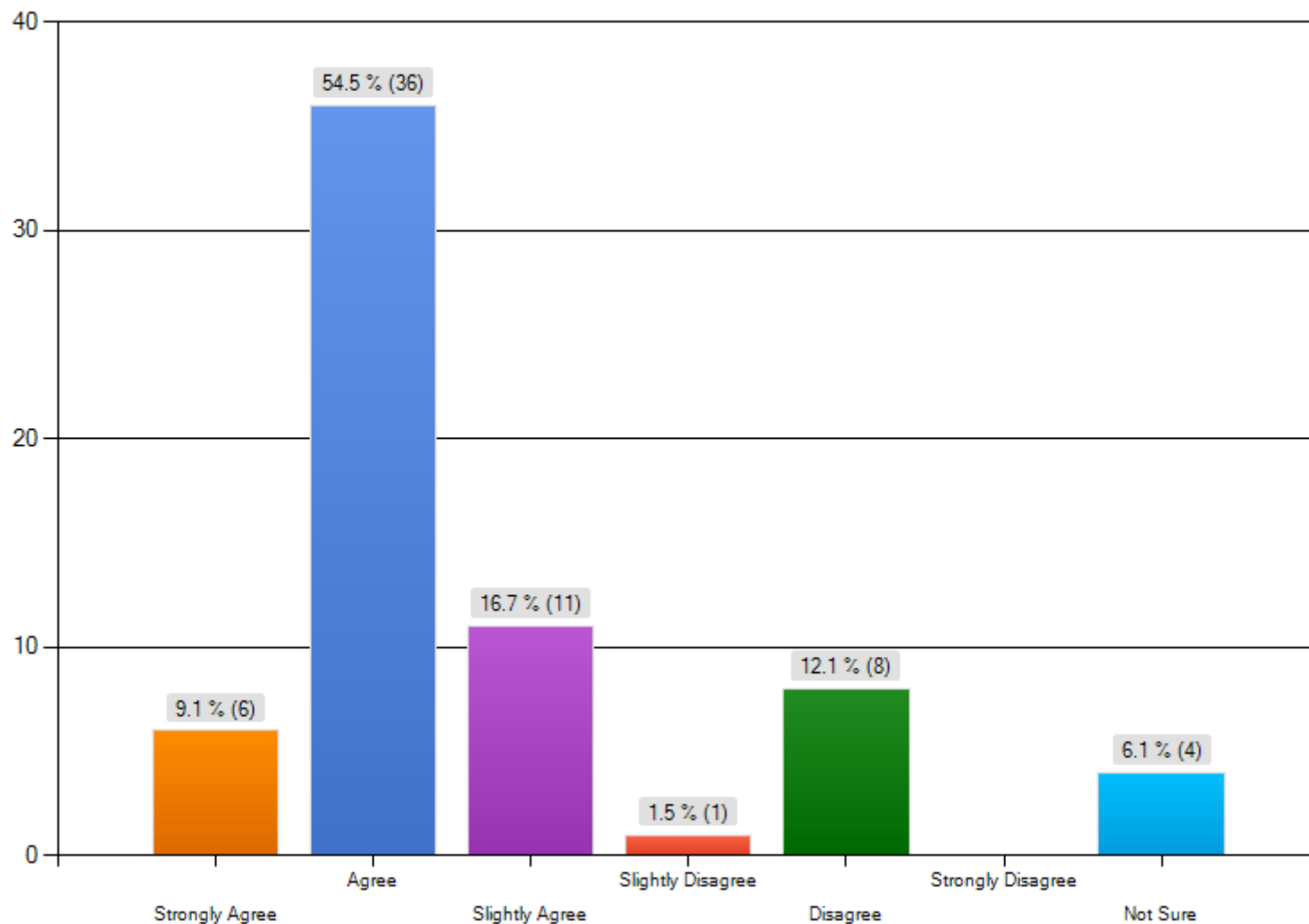
Key Observations

- 80% of respondents understand that promoting VEEP is a part of their job; however ~27 % admit that they do not actively encourage facilities to participate in VEEP
- 77% of respondents believe that there is more they could do to promote the program.
- More than half (~56%) of respondents are comfortable speaking about rewards and incentives associated with VEEP.
- Managers moderately understand customer rewards and incentives; however half of respondents do not believe that VEEP helps them meet program goals.



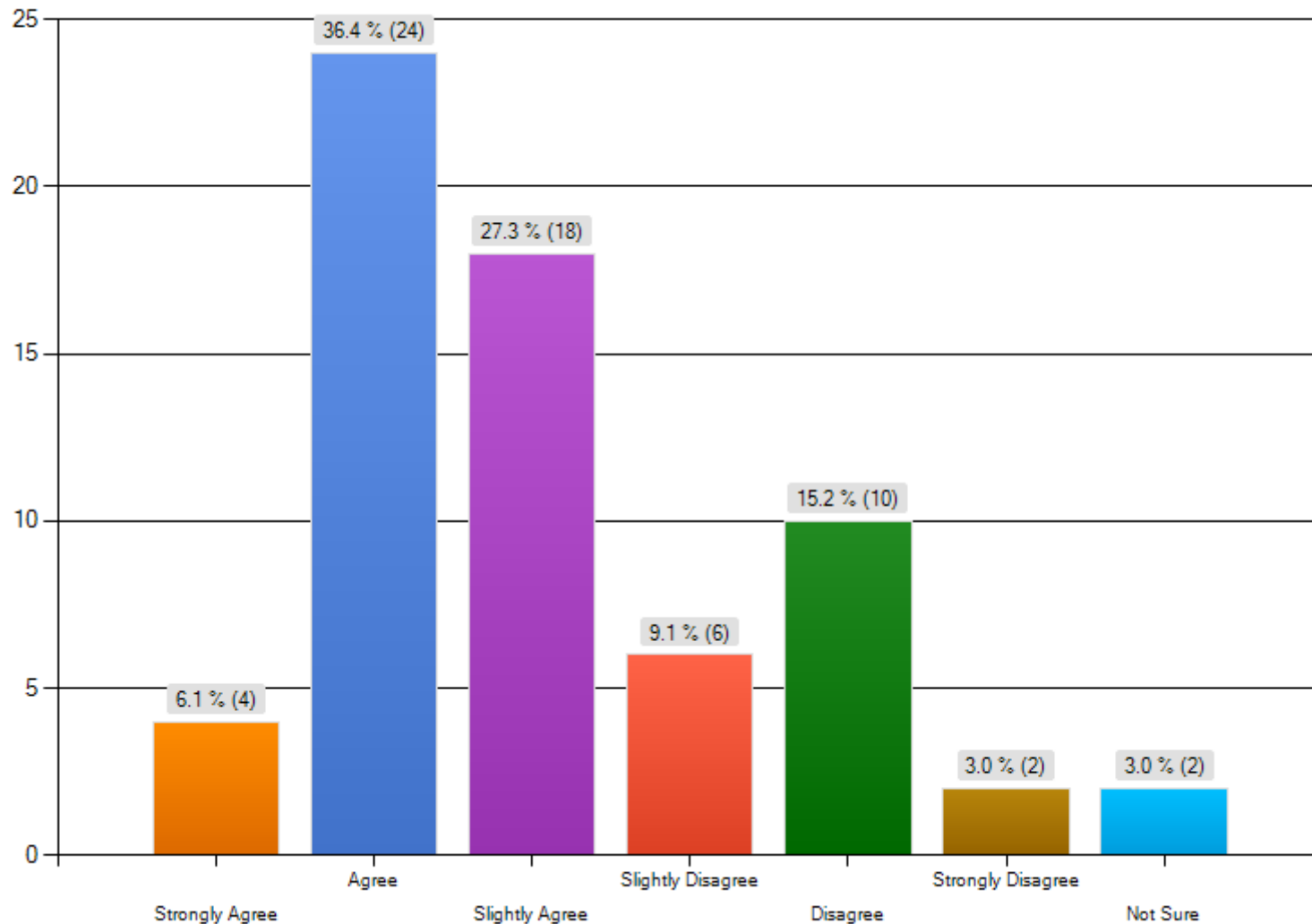
Nearly all managers understand that promoting participation in VEEP is part of their job at DEQ

Question 14: Promoting participation in VEEP is part of my job at DEQ



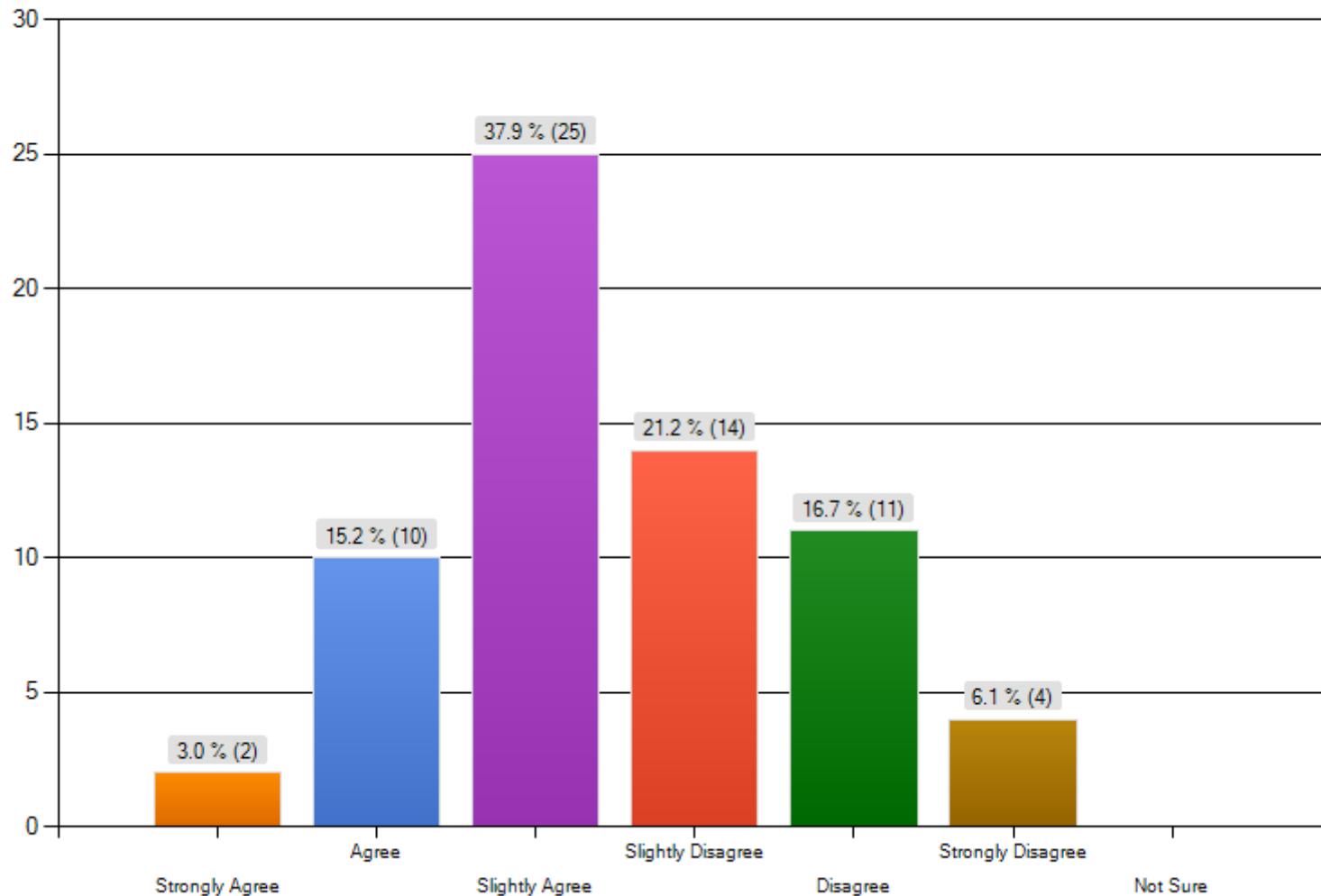
70% of managers actively encourage facilities to participate in VEEP; 27% do not

Question 15: I actively encourage eligible facilities to participate in VEEP



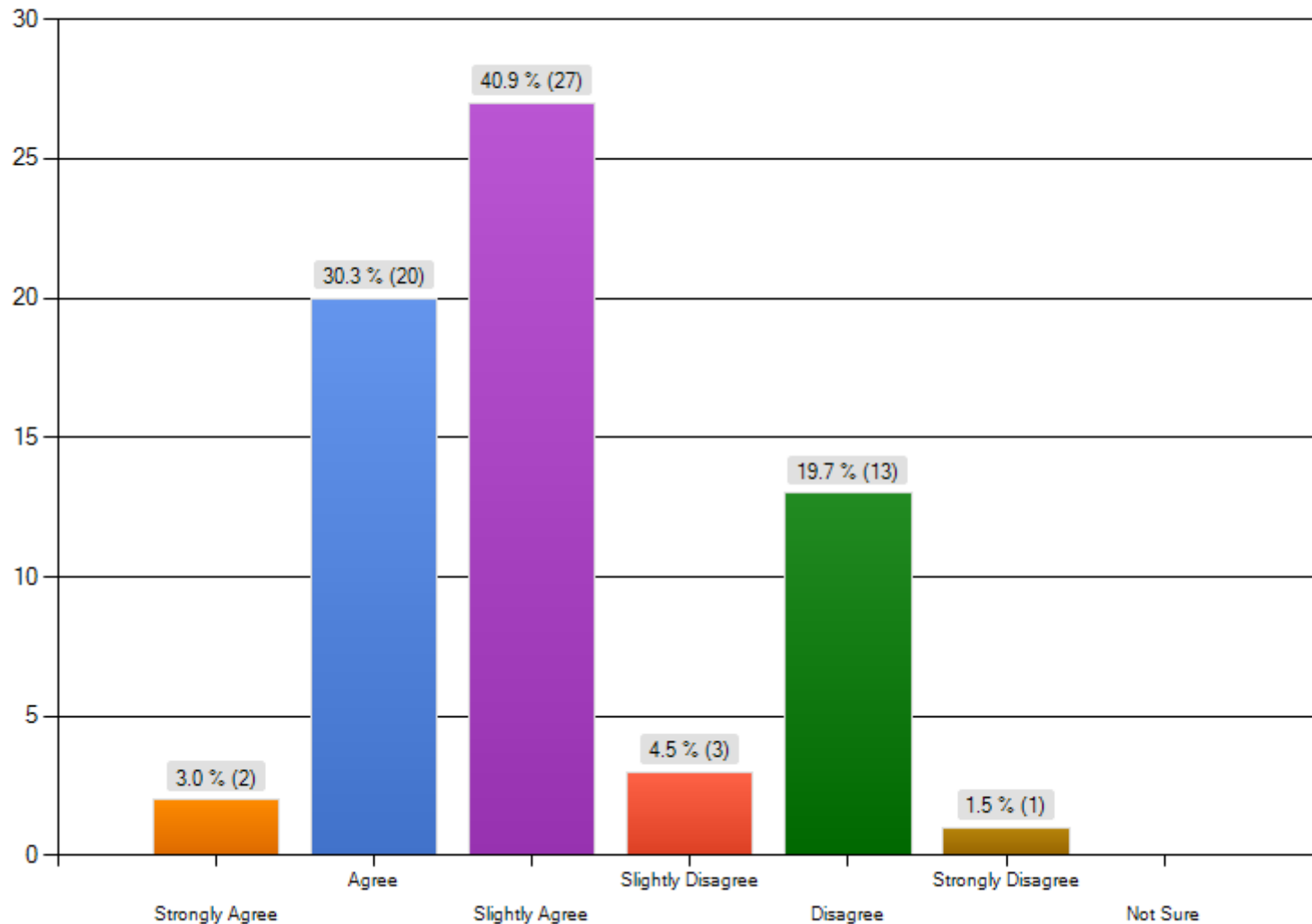
57% of managers feel comfortable explaining incentives and rewards; 43% do not

Question 16: I feel comfortable explaining the incentives and rewards available for VEEP participants



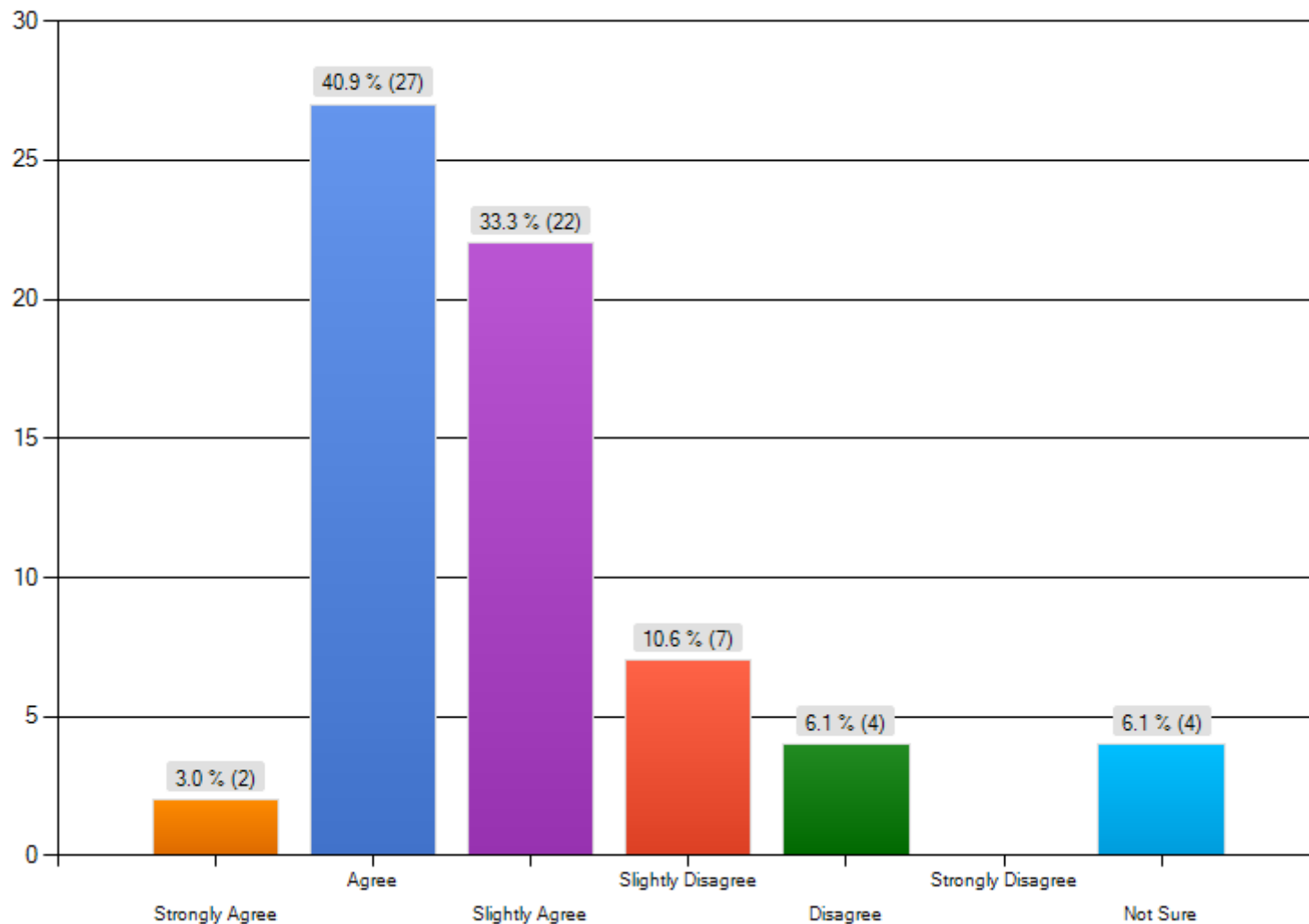
74% of managers feel comfortable promoting VEEP to potential participants

Question 17: I feel comfortable promoting VEEP to potential participants



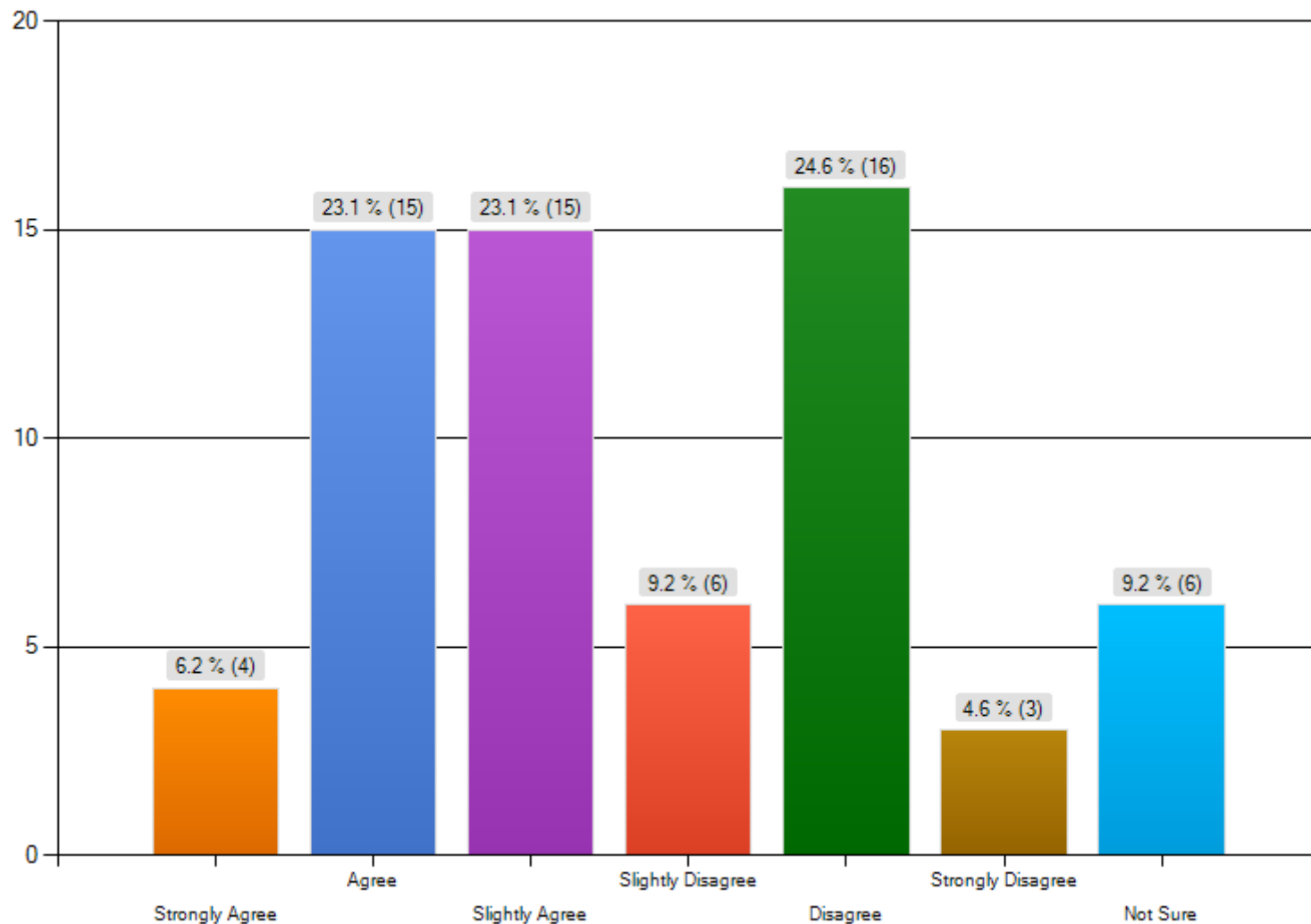
77% of managers feel there is more they could do to promote VEEP to potential participants

Question 18: I feel there is more I could do to promote VEEP to potential participants



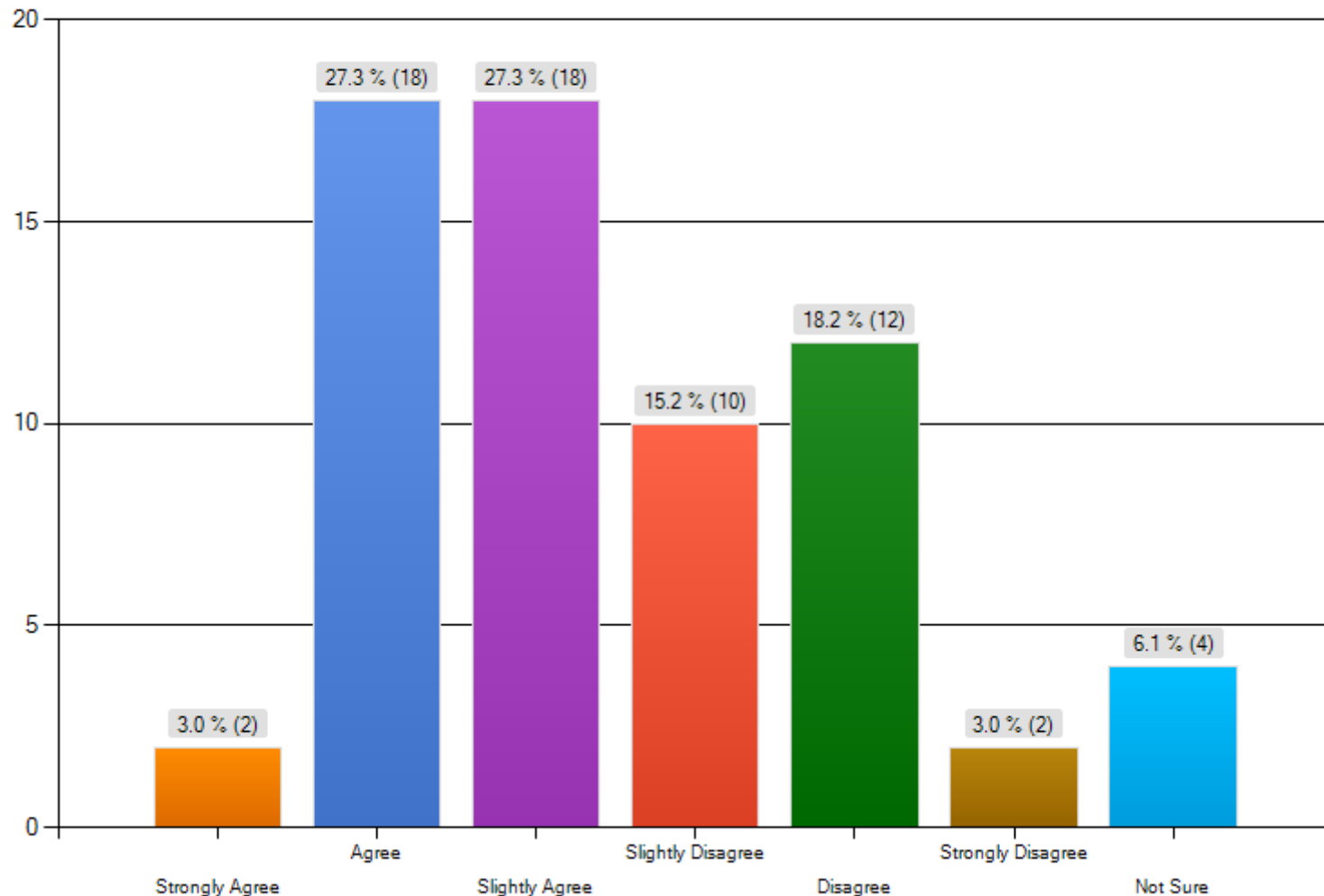
49% of managers either do not believe or are not sure about how VEEP can help them meet program goals

Question 19: VEEP can help me meet my program goals



57% of managers believe they have the information and materials they need to promote VEEP; 43% do not

Question 20: I have the information and materials I need to promote VEEP to potential participants



Managers most prefer to get information from the DEQ intranet, followed by external websites and a subject matter expert; CEDS is least preferred

Question 21: I would like to receive information about VEEP through the following:
(Rank top three from the following)

- ▶ DEQ Intranet
- ▶ External Website
- ▶ CEDS
- ▶ A Point of Contact within DEQ
- ▶ Training
- ▶ Paper/Poster Brochure

Channel	Times 1st	Times 2nd	Times 3rd
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A Point of Contact within DEQ	9	22	11
Training	5	14	17
Paper/Poster/Brochure	9	14	11

Open-ended comments reinforce a need for case studies, improved processes, continued training and promotional materials to increase participation in VEEP

Q22: What training or information could you or your staff use to help better promote the VEEP?

- ▶ Information – basic information about the different levels of the program
- ▶ Training - primarily for staff now that managers are trained or on particular areas
- ▶ Printed marketing materials and web links to promote VEEP
- ▶ Case Studies -- examples of incentives offered, real life benefits and by area so that ideas can be applied to like situations

Q23: What reasons do you think businesses have for not participating in VEEP?

- ▶ Don't understand/aren't aware of the program
- ▶ The benefits are unclear/intangible. There is no clear return on investment
- ▶ It is a lot of work
- ▶ Fear that participation will put them on DEQ's radar

Q24: How would you improve the VEEP (include any specific ideas)?

- ▶ More marketing/emphasis on incentives
- ▶ Technology and process improvements to reduce the amount of time it takes to identify/track participation
- ▶ Meet with participants in person and hold regular events to provide high-touch coaching, support and reinforcement
- ▶ Provide model EMS' for people to see and use in developing their own programs

Question 22: Managers requested print and marketing materials, training, and case studies to better understand and promote VEEP -- they noted recent materials were very helpful

Question 22: What training or information could you or your staff use to help better promote the VEEP?

Printed Materials

- ▶ The one pager that Sharon sent out on 10/5 is perfect.
- ▶ The information provided with the email from Sharon Baxter is a good start.
- ▶ We could use a very short handout that gives us the basics we need to know to understand the benefits of the program and the prerequisites for qualification.
- ▶ Handout brochures specific to the media and industry.
- ▶ need a brochure with eligibility info, benefits and process to hand to potential VEEP participants (possibly differentiate between recognition program and incentive program)
- ▶ attached 1 page summary is helpful
- ▶ Need to better explain the criteria to become and remain a VEEP member.
- ▶ How to apply this to VWP
- ▶ What are the consequences to our permitting, compliance and enforcement programs once a facility is in VEEP? HOW DOES THIS CHANGE HOW WE DO OUR JOBS?
- ▶ VEEP incentives and info about facilities participating in the region
- ▶ Current flyer is nice.

Training

- ▶ Trained on the workflow of VEEP process and reviews
- ▶ Training regarding EMS which is frequent component of participation in VEEP
- ▶ annual training/program updates.
- ▶ "VEEP 101" should be required for all staff.
- ▶ EMS training and training on the program framework
- ▶ Staff should also have training.
- ▶ An actual training session and real life examples.
- ▶ webinars on LMS would be helpful.
- ▶ Part of my staff needs a basic introduction.
- ▶ Presentations to specific programs; i.e. when program managers have meetings (ACMs, WPMs, etc.)

Basic Information

- ▶ VEEP members are improving the environment. Need to better explain the difference between the levels of VEEP.
- ▶ A clearer understanding of the benefits and the legalities of the program.
- ▶ clear training on differences in levels and required documentation

Marketing Materials

- ▶ web links to provide to prospective participants
- ▶ Material to hand out to prospective water withdrawal permittees
- ▶ Summary of requirements and rewards for VEEP participation.
- ▶ I think it would be beneficial to have brochures or other documentation to provide to facilities that has case studies or stories of actual facilities that have implemented EMS's or gone through VEEP or similar programs in other states and have seen benefits. (Forgive me if this already exists).
- ▶ Marketing material using quotes from existing participants about cost savings.
- ▶ Simple brochures with Q&A to help show the benefits.
- ▶ **Case Studies**
- ▶ If there are existing VEEP participants within the petroleum storage and transport areas, then I would like to learn more about those programs.
- ▶ Case examples of when flexibility was and wasn't used
- ▶ case studies
- ▶ examples of incentives provided to VEEP participants
- ▶ For staff to actively promote VEEP, I think they need to see how it really affects a facility. If the benefits are intangible, many (most?) will not actively promote the program. However, direct regulatory benefits (i.e. the regulatory flexibility benefit) are much more tangible.
- ▶ methods to help them promote the program.

Other

- ▶ I would also think it would be beneficial for those facilities that have made E3 or E4 to create a relationship with them in which we could use their facilities as training grounds for new inspectors or other staff members or even other facilities that would like to see a "good" facility. I would hope that this would allow the facility to have pride in what they are doing and know that we are aware of the work they have put in.

Negative Feedback

- ▶ None, the time we are spending in VEEP training is disproportional to the other training we receive.

Questions 23: Managers requested more marketing/promotion, better emphasis on incentives, in person meetings and process changes to improve the program

Question 23: How would you improve the VEEP (include any specific ideas)?

Case Studies

- ▶ case studies; model EMSs to look at

More Marketing/Promotion

- ▶ Make the promotional material and criteria more specific to the industry and media.
- ▶ Approach business & trade associations, county government & any associations that represent multiple facilities.
- ▶ Since the program is not presently underway federally, it might benefit us if Virginia worked out a State specific marketing scheme that was an ideal fit for Virginia. It might necessitate a name change
- ▶ Do a better job of getting the word out to the regulated community and the DEQ staff.
- ▶ Encourage staff to promote it because its a good program, not because the LT said so.
- ▶ I would think it would be helpful to have information more easily accessible to the public regarding VEEP. Maybe a link directly off of our external home page that the public could look up VEEP "certified" businesses or maybe have a VEEP facility of the month on the home page.
- ▶ Add rewards of VEEP participation to all discussions with responsible parties.

Better Emphasize Benefits/Incentives

- ▶ Tie VEEP participation to something they need
- ▶ Companies need immediate economic incentives. Maybe a reduction in permit fees or application fees would help
- ▶ It needs to be a more visible program. Participants, especially E4s need to be celebrated more and held up for all to see.
- ▶ somewhat separate the recognition program from the incentive program (see above) to be able to target facilities based on their level of EMS sophistication
- ▶ Develop a program applicable to VWP
- ▶ better incentives
- ▶ Increase emphasis on \$\$ savings from P2 as incentive.

Make Process Changes

- ▶ Less Frequent Inspection
- ▶ streamline paperwork for participants - go electronic 100% and keep it simple; Need to show \$ cost savings examples for industry.
- ▶ integration of the VEEP process and reviews within DEQ daily functions
- ▶ Make it more clear what companies are participating. Provide companies with a letter that could be given to DEQ inspectors at the time of the inspection. Provide colored folders to the regions for the files for the VEEP members so that it is clear that the facility has a VEEP designation.
- ▶ Conditions for admittance in state law too lax. Should be targeted at best facilities. Maybe change to 1 NOV in last 5 years? Not sure how best to strengthen admittance criteria.

Regular Meetings/In Person

- ▶ Hold regular regional meetings of VEEP members and DEQ regional office technical staff - similar to the Performance Track member meetings that EPA RI11 formerly conducted. This would help build/strengthen the relationship with DEQ staff that most VEEP members say is a main reason they join. Would also help DEQ staff become more familiar with the program and what the members are interested in.
- ▶ Hold regionally based VEEP meet and greet lunches between DEQ Inspectors and VEEP participants in that region. Include guest speaker, free food, and opportunities for DEQ staff to interact and "know" who the VEEP orgs are in their Region. Dramatically increase the Agency-Wide communication about VEEP via email, via opt-in listserv, via Managers including discussion of it at regular staff meetings, via posters, flyers. Basically operate VEEP as a full blown internal marketing/PR campaign.

Better Customer Support/Training

- ▶ Develop and provide the training above. A critical component of this would be some scenarios in which the agency division directors say what they'd allow (or prefer not to happen) regarding regional permitting, compliance and enforcement activity.

Technology

- ▶ Create a searchable database including a summary of each site and successes they have achieved
- ▶ Improved agency wide participation and promotion

Negative Feedback/Comments

- ▶ I believe businesses will not protect water quality as much if they are inspected less frequently as in VEEP.
- ▶ We have found some applicants do not have a good compliance history and frankly have given us a hard time in getting returns to compliance at their facilities. So, it's difficult for us to feel strong support for the program when some of the successful applicants have been unpleasant to work with and lack sincerity in their environmental enhancement undertakings.

Questions 24: Managers speculate that customers shy away from VEEP due to unclear benefits, increased work, lack of awareness and a fear of increased attention/scrutiny

Question 24: What reasons do you think businesses have for not participating in VEEP?

Unclear Benefit/Return on Investment

- ▶ Businesses need to begin to focus on growth through efficiency. Energy costs are going to escalate with or without cap and trade legislation. Peak Oil and climate change mean that companies will need reduce energy consumption dramatically to be survive. Those that start sooner and work the hardest toward waste minimization will have a clear edge. If a company is not participating in VEEP they probably don't see VEEP as the tool which can drive necessary efficiencies.
- ▶ The don't believe there is anything tangible in it for them
- ▶ Uncertainty of benefits vs. work involved.
- ▶ No clear benefit to them other than recognition. Simply feeling good about the program doesn't necessarily make it a worthwhile program.
- ▶ Not sure that it promotes their business
- ▶ Not benefit to the profit and loss. The less contact with DEQ in any form is always better.
- ▶ Only the bottom line, money. If it costs for them to participate, then they may not.
- ▶ Current economic climate does not allow businesses a lot of extra staff. Development and management of an EMS or a VEEP type program takes time, thought, and resources. Many businesses may not have the additional staff/resources right now to participate. Also, for air, most, if not all, of the air permitting and enforcement/compliance requirements are mandates by the federal government. As such, very hard/nearly impossible to reduce these requirements to benefit a VEEP facility. For some types of facilities, like small businesses, a self certification process may be a better approach/easier sell than a VEEP program. Allows the business the opportunity to get free training on how to comply with regulations, allows the DEQ to get credit for applying/enforcing the requirements without typical inspection approaches.

Unclear Return on Investment (continued)

- ▶ Little monetary incentive. Federal government no longer recognizes so little enforcement protection
- ▶ Don't know about it or if they do, some think there will be added costs to join and report annually. Also, not every facility has a good enough compliance record to be accepted into the program.
- ▶ Since most VWP permits are issued to LLC' that are dissolved after the development is complete, the VEEP time frame is to long and there is no financial benefit to the developer.
- ▶ A number of them would like a "get out of jail free" card and aren't willing to put out the extra effort for anything less.
- ▶ Perception that there are very limited regulatory-relief benefits under the program. Good PR seems to be the biggest incentive currently.
- ▶ Don't know about it. Unsure how it will impact their bottom line.
- ▶ The benefits are unclear or are known and do not provide strong enough incentives for them.
- ▶ Environmental compliance is not a priority unless there are economic advantages. I believe it is difficult for businesses to see the cost saving features of having a good EMS in place especially when many do not have a dedicated environmental staff person in place who would know what an EMS is or how to implement. There seems to be a large upfront cost to creating an EMS that may scare businesses off. One of the items that came up at our training was the idea of E4s mentoring E3s or lower and I think this would be a wonderful idea for those businesses where the interest is there but not necessarily the resources.
- ▶ Unaware, increased paperwork, incentive awards not enough, not enough awareness by the public as to what VEEP means to the public and the environment.

Too Much Work

- ▶ Don't know enough, too much work, anticipated negatives (scrutiny, more paperwork,...), no resource for developing/maintaining EMS
- ▶ Too much paper work
- ▶ The rewards are not worth the effort.
- ▶ Requires more work from non-profit side of business. e.g. the environmental/safety/hygiene departments are expenses
- ▶ Form is not as easy as it could be. For facilities that DEQ deals with and has the info on file, we could list all the facilities on the web, and they choose their facility from a drop-down menu, and the level that they are applying for.

Lack of Awareness

- ▶ lack of knowledge on applicability to their operations and compliance to Virginia regulations
- ▶ Lack of knowledge of existence, lack of understanding of benefits, and requirements.
- ▶ They don't know enough about it, or the incentives are not significant enough to be worth the effort.
- ▶ Smaller businesses such as tank owners have never heard of VEEP.
- ▶ Lack of knowledge, concern about commitment, time, and benefits.
- ▶ They don't know about it. There has not been enough promotion of the program and the positive attributes of it. There has not been enough promotion of the benefits to the facilities.
- ▶ Don't fully understand the program

Don't Want to Draw Attention

- ▶ Suspicious of government.
- ▶ Afraid it will expose them to regulatory liability, not worth the time for the return they'll gain.
- ▶ Fear of being on DEQ's radar

generation, recycle, etc

Priority recommendations fall into 3 main categories:

- ▶ Continue to communicate about VEEP and include information in DEQ training sessions
 - The increase in DEQ Managers' knowledge base indicates the success of the VEEP trainings
 - Integrate future trainings as possible to minimize the impact on staff time
- ▶ Periodically distribute informational materials and support program managers via existing tools (e.g., intranet)
- ▶ Continue to build support among program managers and regional staff through frequent communications and interactions on program developments including recruitment
- ▶ As possible, build a “library” of success stories to include in informational materials and on the website. Leverage members to assist.