

US EPA ARCHIVE DOCUMENT



# Virginia Environmental Excellence Program (VEEP) Integration Project

Northern Regional Office  
October 1, 2009

# Purpose of this Presentation

- ▶ Learn the specific program details of the Virginia Environmental Excellence Program (VEEP)
- ▶ Be able to promote VEEP as a way to advance the goals of DEQ
- ▶ Discuss the results of the stakeholder analysis
- ▶ Provide feedback on:
  - How to more fully integrate the program into other DEQ activities
  - How VEEP might be improved as “another tool in the toolbox”
  - How best to promote VEEP
  - What facilities should be targeted for recruitment
  - Improving the communication and coordination between VEEP and Regional offices

# New Developments



- ▶ EPA halts National Environmental Performance Track Program
- ▶ David Paylor announces that DEQ remains “strongly committed” to VEEP
- ▶ Governor Kaine’s *Renew Virginia* initiative includes Executive Order 82: Greening of State Government
- ▶ By July 1, 2010, every agency and institution must:
  - Notify DEQ of their intention to achieve VEEP E2 or
  - Develop environmental policies for energy use, water use, waste reduction and travel



# VEEP: The Program

## What is VEEP?

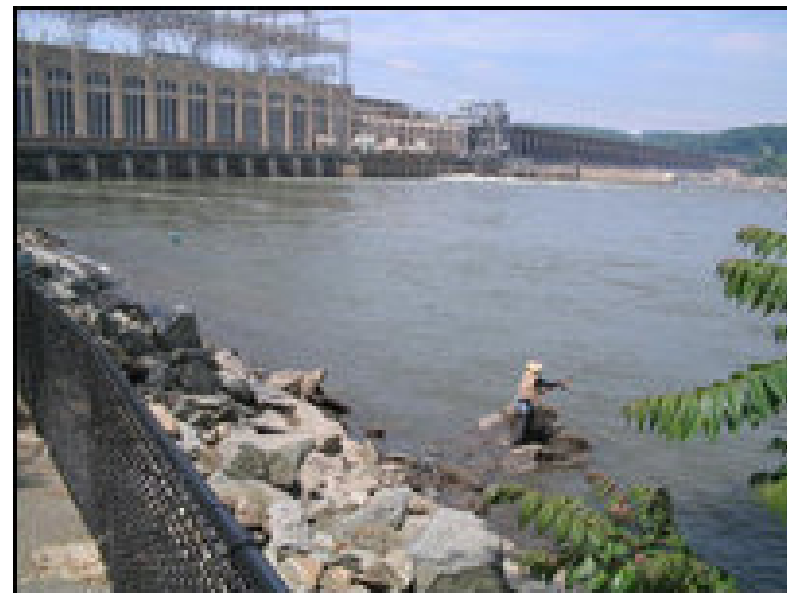
- ▶ One of DEQ's approaches to improve environmental performance
- ▶ Establishes meaningful collaborative relationships
- ▶ Encourages environmental innovation
- ▶ Focuses on environmental management systems (EMS), pollution prevention, and moving "beyond compliance"
- ▶ An innovative partnership program



- ▶ Started July 2000
- ▶ Codified July 2005

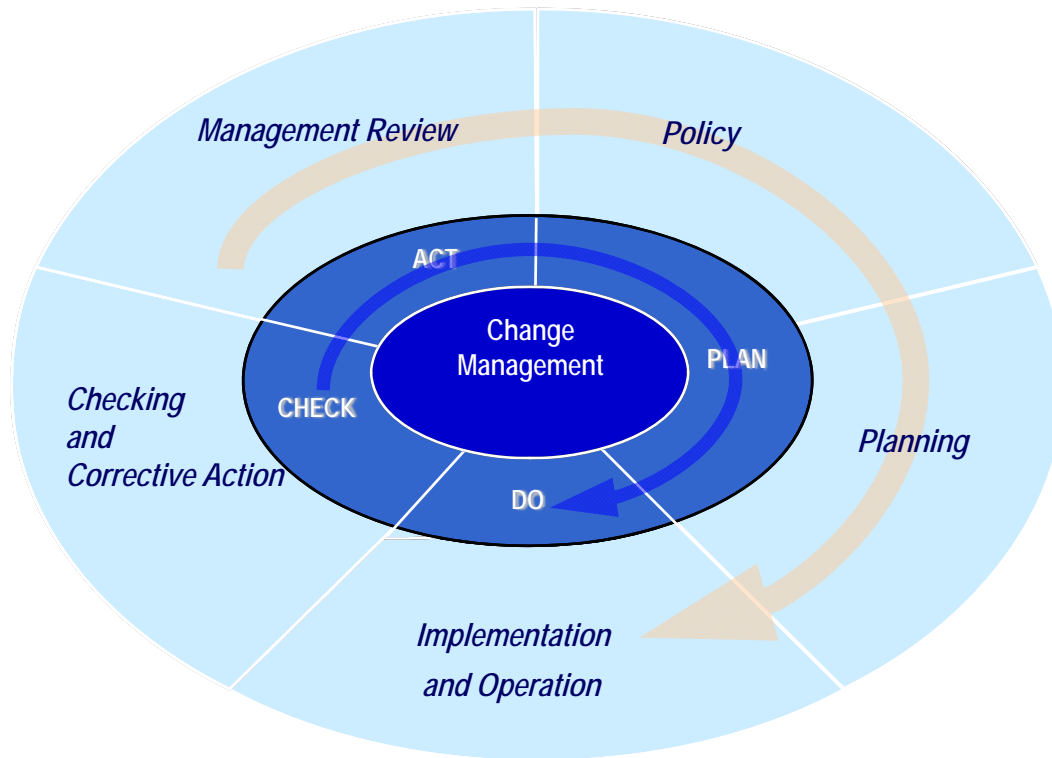
# Who is Eligible?

- ▶ Any Virginia facility that impacts the environment through its operations, activities, processes, location, etc.
  
- ▶ Environmental Enterprise (E2):
  - Environmental Policy Statement
  - Identification of Environmental Impacts
  - Establishment of Targets
  - Pollution Prevention Program
  
- ▶ Exemplary Environmental Enterprise (E3):
  - Fully implemented EMS
  - EMS self-assessment
  - Procedures for communicating environmental information to the public



- ▶ Extraordinary Environmental Enterprise (E4):
  - Fully implemented EMS
  - Third party EMS audit
  - One full EMS cycle completed

# What is the EMS Cycle?

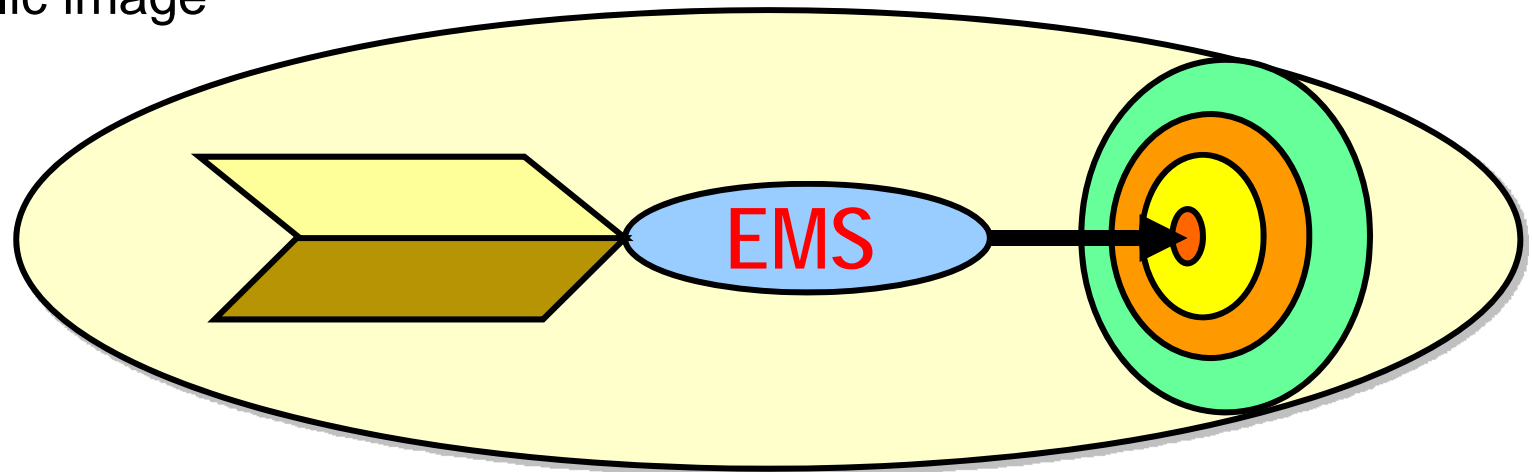


- ▶ A systematic method to identify and reduce impacts on the environment by integrating environmental and health considerations into the decision-making processes
- ▶ A process of continual improvement
- ▶ Plan, Do, Check, Act Cycle
- ▶ *EMS is only the tool*



## What are the benefits of an EMS?

- ▶ Improve efficiency and consistency in operations and activities
- ▶ Achieve environmental awareness and behavior change
- ▶ Improve communications
- ▶ Facilitate compliance
- ▶ Improve public image



# What is a record of sustained compliance?

– “the person or facility

(i) has no judgment or conviction entered against it, or against any key personnel of the person or facility or any person with an ownership interest in the facility for a criminal violation of the environmental protection laws of the United States, the Commonwealth, or any state in the previous five years;

(ii) has been neither the cause of, nor liable for, more than two significant environmental violations in the previous three years;

(iii) has no unresolved notices of violations or potential violations of environmental requirements with the Department or one of the Boards;

(iv) is in compliance with the terms of any order or decree, executive compliance agreement, or related enforcement measure issued by the Department, one of the Boards, or the U.S. Environmental Protection Agency; and

(v) has not demonstrated in any other way an unwillingness or inability to comply with environmental protection requirements.”

(Section 10.1-1187.1 of the Code of Virginia)



# What is the Reporting Requirement?



- ▶ Annual reports are required at all levels of the program
- ▶ Facilities must show progress with and continued implementation of their EMS and pollution prevention program
- ▶ Reports for the previous calendar year must be submitted by April 1 of the following year
- ▶ VEEP 2008 Annual Report Summary Data
  - Reduced total water use by more than 38.5 million gallons
  - Recycled over 2.7 million tons of non-hazardous waste
  - Increased use of reclaimed/recycled water by more than 240,000,000 gallons
  - Increased recycled materials use by 7 tons
  - Over \$300,000 in cost savings

# What are the Benefits of VEEP to Members?

## ▶ Recognition

- Program plaques,
- VEEP flag (E3 and E4),
- Recognition ceremonies

## ▶ Relationship

- Single point of contact at DEQ
- Collaboration

## ▶ Incentives

- Annual Permit Fee Discounts
- Alternative compliance methods (regulatory flexibility)

*Is it realistic to expect program and Regional staff to give VEEP members “special attention?”*

# What is Regulatory Flexibility?

- ▶ The Air Pollution Control Board, the State Water Control Board and the Waste Management Board “may grant alternative compliance methods to the regulations adopted pursuant to their authorities” for VEEP E3 and E4 facilities considered to be in good standing with the program. (Section 10.1-1187.6 of the *Code of Virginia*)
  
- ▶ Potential alternative compliance methods (ACM) outlined by the law include:
  - Changes to monitoring and reporting requirements and schedules,
  - Streamlined submission requirements for permit renewals,
  - The ability to make certain operational changes without prior approval, and
  - Other changes that would not increase a facility’s impact on the environment.

# What are the Benefits of VEEP to DEQ?

- ▶ Increase efficient use of DEQ resources
- ▶ Improve collaboration with regulated community
- ▶ Improve environmental performance beyond compliance
- ▶ Increase likelihood that facilities will maintain compliance
- ▶ More efficient delivery of tools, technical support, and knowledge sharing

# Aligning Goals with Regional Priorities

- ▶ Watershed issues
  - Chesapeake Bay
  - Wetland protection
  
- ▶ Airshed Issues
  - Roanoke, Winchester, Northern VA,
  - Richmond,
  - Hampton Roads, Fredericksburg
  
- ▶ Land protection
  - Brownfields



# How does DEQ Communicate with VEEP Members?

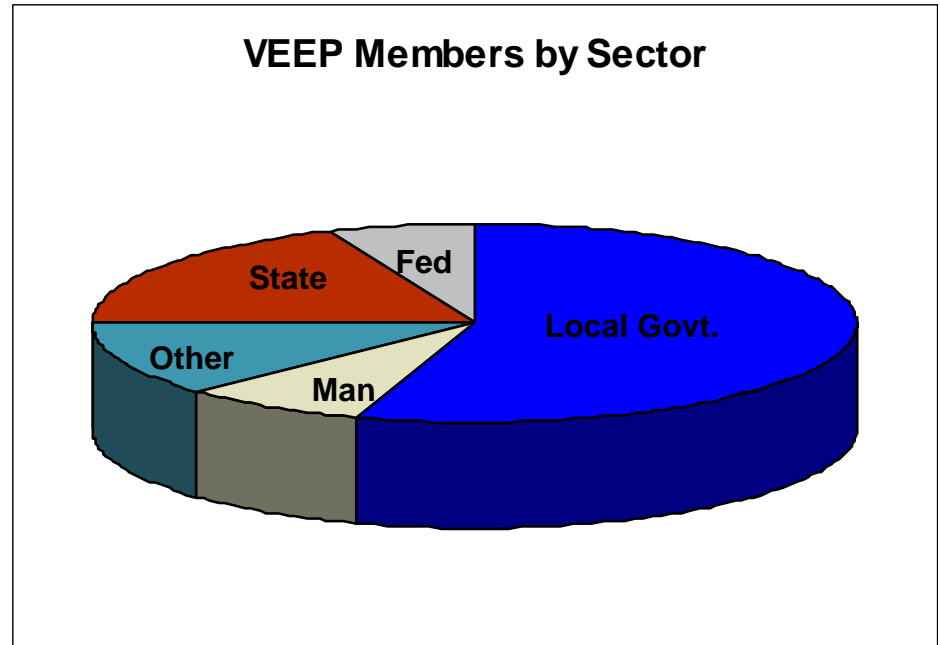
- ▶ Electronic VEEP newsletter
- ▶ Webinars on EMS and energy topics
- ▶ VEEP meetings around the state
- ▶ Emails
- ▶ Site visits
- ▶ Conferences





# Who are the VEEP Members?

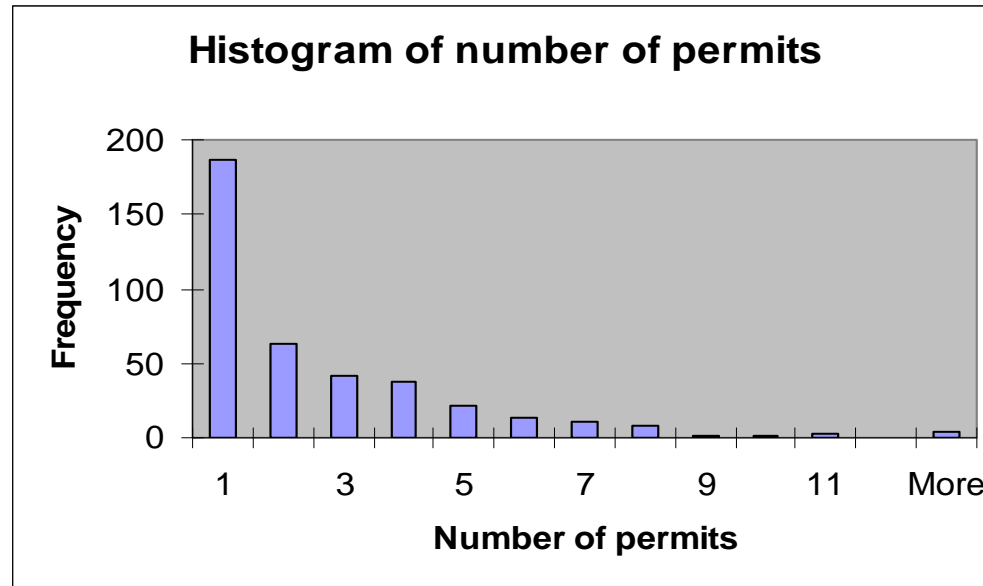
- ▶ 440 Members by Level
  - 258 E2 (58%)
  - 156 E3 (35%)
  - 26 E4 (6%)
- ▶ 440 Members by Sector
  - local governments (55%)
  - manufacturers (8%)
  - other (12%)
  - state agencies (19%)
  - and federal agencies (6%)



*How might we attract more manufacturers into the program?*

# VEEP Members that hold Permits

Number of facilities (applicants and accepted)	593
Facilities that have at least 1 permit	393
Facilities with no permits	200
Facilities without "major" permits	318
Air Permits	146
Water Discharge (VPDES)	147
GW Withdrawal	14
Wetlands	3
Solid Waste	46
Hazardous Waste	116



*Should we be targeting more permitted facilities for recruitment?*



# VEEP Integration Project: Stakeholder Analysis

# External Stakeholder Engagements

## ▶ External Stakeholder Interviews

- Conducted between November 2007 and February 2008
- Included members, potential members, and key supporters (e.g., EPA, Sierra Club)
- Identified perceptions of VEEP, strengths, weaknesses, barriers, and value

## ▶ Stakeholder Dialogs

- Focused on fostering innovation and partnerships
- Focused on integrating DEQ regional priorities into EMSs
- Identified significant support for partnerships among VEEP members and external stakeholders

# External Stakeholder Perceptions

## ▶ Incentives/Benefits

- Commercial entities emphasized financial benefits
- Government entities emphasized recognition

## ▶ Strategic Communications

- Incentives are not clear and there is a lack of lessons learned, success stories, and quantifiable benefits.

## ▶ Innovation

- DEQ's middle management described as averse to environmental innovation. Notably, stakeholders recognize DEQ's executive team as a strong proponent of innovation.

# External Stakeholder Perceptions of DEQ

## ▶ DEQ Knowledge and Consistency

- Stakeholders see DEQ's institutional knowledge about VEEP as low, causing an inconsistent application of VEEP across the Commonwealth. Evidence demonstrates that in many cases customers know significantly more about the program than DEQ employees.

## ▶ Implementation

- There is a lack of support from program staff, mentoring, and collaborative technical support.

*How might program and Regional staff become better educated on the program?*

# DEQ Program Manager Survey

- ▶ Surveyed 108 program managers across DEQ
- ▶ Response Rate of 81% (87/108)
- ▶ 47% of respondents reside in Permits & Compliance
- ▶ 39% of respondents are central office program managers; 61% of respondents are Regional program managers
- ▶ Key improvements identified through the survey
  - Publish clear, quantifiable benefits of VEEP participation
  - Communicate more about VEEP and include information in DEQ trainings
  - Develop more reference materials and support

# Managers' Survey: The Results

- ▶ 58% of respondents believe they have a moderate level of understanding of VEEP
- ▶ 88% believe VEEP is important
- ▶ 86% believe the program has a positive impact on the environment
- ▶ 61% of respondents said they do not have enough information
- ▶ 40% of respondents do not actively promote VEEP
- ▶ 73% of respondents believe they can do more to promote the program

*Can program and Regional staff be expected to promote VEEP?*

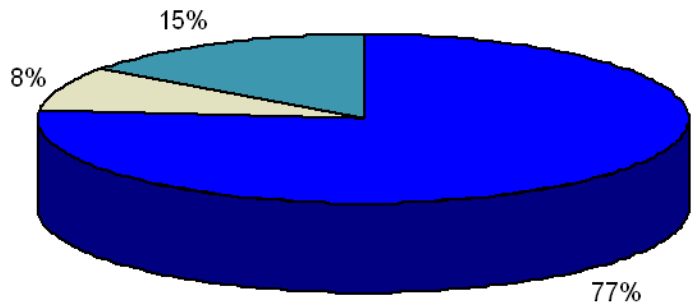


# Results: VEEP Makes a Difference

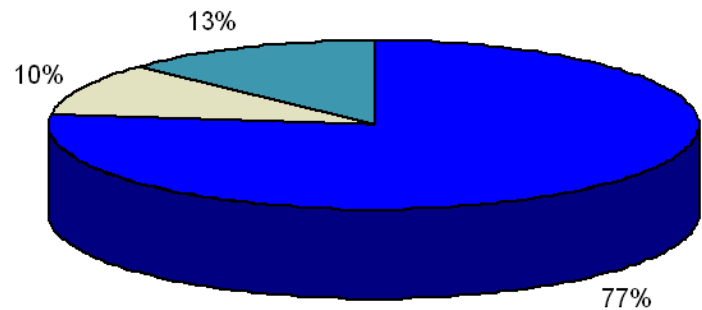
▶ Levels of VEEP Support:

- 77% believe VEEP positively impacts the environment
- 77% believe VEEP is important to them

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



**Question 10: Improving participation in VEEP is important to me**



■ Responded with Agreement ■ Responded with Disagreement ■ Did not know

# Open-ended Comments

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

- ▶ Information – at many levels, including basic, detailed, and more targeted to apply to specific customers/situations
- ▶ Training
- ▶ Printed materials to promote VEEP
- ▶ Regular communication/updates on VEEP
- ▶ Case Studies
- ▶ Technology

### Sample Comments

- “Updated information on the effectiveness of the program would be helpful”
- “Real examples of VEEP benefits”
- “What it is, who it applies to, how it works, and benefits for the regulated community and environment”
- “Brochures we can send out on request”
- “Program overview with emphasis on the media that individuals are associated with”
- “Brown bag lunches on this and other programs, e.g. “Program of the Quarter”
- “Searchable database with existing site information including addresses”

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

- ▶ Resources/Cost too high
- ▶ Lack of awareness
- ▶ Unclear benefits
- ▶ Fear of increasing DEQ scrutiny/attention
- ▶ Non compliance issues

### Sample Comments

- “Perceived cost v. benefit”
- “Fear of additional paperwork/work in general”
- “Too much work for too few incentives”
- “Unclear what is in it for them”
- “Reduced reporting requirements and limited liability may not be strong enough incentives”
- “Afraid it is another way for regulators to know more about their business”
- “It puts them on our radar screen”

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

- ▶ Provide better/clearer incentives
- ▶ Increase marketing/promotion of VEEP
- ▶ Provide more staff support and training
- ▶ Produce printed materials
- ▶ Better customer support and training
- ▶ Improve program requirements
- ▶ Support with technology

### Sample Comments

- “Staff and business community training”
- “Easy to read and understand literature for internal and external use”
- “Come up with tangible incentives for companies to participate”
- “Make it more meaningful with bigger fanfare”
- “Promote incentives”
- “Target materials by sector or program to help explain and sell the program better”
- “There is the impression that facilities who are not good to the environment get into VEEP regularly”
- “Provide web-based permitting”

# Recommendations for Program Integration

- ▶ Encourage DEQ culture to focus on environmental results, regulatory and VEEP as complementary approaches
- ▶ Increase program and Regional staff involvement in VEEP process
- ▶ Encourage DEQ staff to promote VEEP to the regulated community as appropriate
- ▶ Include Regional staff in developing an annual recruitment strategy

# Recommendations of Program Redesign

- ▶ Need clear performance-based objectives of the program tied to DEQ Strategic Plan
- ▶ Reconsider the program tiers to allow for separate branding of the on-ramp program (incentive) and excellence program (recognition)
- ▶ On-ramp program should focus on technical assistance and look to increase membership
- ▶ Excellence program should focus on recognition and increase innovation

# Recommendations for Regional Staff Participation

- ▶ Promote VEEP to the “high performers” as a form of recognition and to encourage beyond compliance initiatives and innovation
- ▶ Promote VEEP to “low performers” as an incentive to improve performance and management
- ▶ Participate in the development of a recruitment plan including identifying facilities that are appropriate for the program
- ▶ Participate in the application process and provide the on-the-ground intelligence on the facility
- ▶ Communicate with the VEEP staff on changes of facility status (developing compliance issues, resolving compliance issues, changes in facility management that may be receptive to VEEP)

## Follow Up



- ▶ The manager's survey will be conducted within 2 weeks of the training.
- ▶ The delivery of additional tools and guidance documents
  - Tool kit
  - Brochure for prospective members