

US EPA ARCHIVE DOCUMENT

Promoting Environmental Excellence through Environmental Leadership and Voluntary Performance Improvements

Assistance Agreement No. EI-96489208-0

**Quarterly Report
January 1, 2010 – March 31, 2010**

Project Synopsis

This project will expand environmental performance and leadership throughout Kentucky. The project will 1) implement a Technical Assistance Program (TAP) to improve performance at targeted facilities; 2) use the TAP as a recruitment tool that will expand the membership of Kentucky's environmental leadership program, KY EXCEL, to more than 500 entities; and 3) encourage these new KY EXCEL members to perform waste reduction or energy efficiency projects at their facilities.

This quarterly report is being submitted for January 1, 2010 – March 31, 2010 and is inclusive of activities conducted during this time period.

Narrative Discussion

Over the last quarter, the division focused on distribution of the first compliance assistance tool (Environmental Stewardship Calendar) for the TAP effort and implementation of the project's outreach strategy. The strategy ensures that sufficient contact is made with the sector to communicate compliance-related information on a routine basis that will remind the targeted audience of its regulatory responsibilities while serving as a vehicle to point out sustainable opportunities and invite participation in KY EXCEL, the department's environmental leadership program. Details of these activities are as follows:

As reported previously, two counties are being targeted (Franklin and Laurel) for the TAP outreach. This quarter, division staff verified that the targeted facilities were in operation. The verification was done by calling the respective gas stations for verification of operation status. After review, it was determined that the outreach universe for the two counties is 96 entities, split 36 for Franklin county and 60 for Laurel county. The program then completed a three year compliance history for the targeted entities in each county using the department's internal compliance database. The compliance history spans 2007-2009 for each county.

A temporary employee was hired this quarter with state funds to assist with the outreach strategy development and implementation. This person is primarily responsible for making personalized contact with the identified gas stations and documenting efforts and responses that will be later used to evaluate the outreach efforts holistically. Attached to this report is an example of the outreach letter and the script used to contact the identified gas stations for the project.

After the calendar was sent to the facilities, division staff began to implement the project's outreach strategy. The strategy defines a two-pronged communication approach that uses different follow-up and communication methods with each targeted county to help the agency

determine as part of the project the degree that personalized follow-up and communication influences behaviors as compared to non-personal communication methods. Franklin County facilities receive personalized, in-depth communication utilizing one-on-one phone calls, and on-site visits if requested. This personalized communication method will follow each tool distributed by the division. For example, following distribution of the calendar to Franklin County, a personalized phone call was conducted to each recipient following a prepared script. The details of each call were documented for future evaluation. To ensure all communication and feedback was accurately recorded for future evaluation, an Access Database was developed to help track and categorize interactions with the Franklin County facilities (see attached database screenshot). As a contrast to Franklin County, Laurel County will receive communication by mail with no in-depth personal communication by division staff following distribution of materials. Both counties will receive the same TAP materials. The only variant between the two counties will be the level of personalized communication.

This quarter, division staff also drafted the second assistance tool, the Gasoline Station Green Scorecard. The scorecard will be used as a self assessment tool by the targeted gas stations. The self assessment will assist the stations in evaluating their current green behavior and provide motivation and resources for future sustainable behavior changes. The scorecard will help establish a sustainability baseline for the gas stations and encourage them to make changes in order to "improve their score". The self assessment is designed for station use only and will not be submitted to division staff for review. To facilitate the scorecard development, staff researched existing scorecard tools and used the calendar as a guide to keep the scorecard focused on green activities that can be used as indicators of sustainability. It was decided that for the scorecard to be useful to the targeted stations, the scorecard must be no more than one page, front and back, and be in plain language to accommodate all educational levels. Distribution of the scorecard and facility follow-up will be a primary focus for the next quarterly report.

In addition to the scorecard, staff began to prepare for trainings that will be held for the facilities later this year. Staff attended meetings with Division for Air Quality regarding the federal area source standard (Subpart CCCCC) for Gasoline Distribution and began efforts to ensure coordinated outreach to the sector. Division staff also participated in the review of initial notification forms and outreach information in preparation for future compliance and sustainable training events.

As a result of these efforts, the division is well-prepared to continue implementation of the compliance assistance and sustainability interventions as outlined in the project workplan. The next quarter will focus on finalizing and distributing the Green Scorecard and developing and marketing the project's sustainability training. Staff will also focus on incorporating trade association participation in training events and compliance outreach. Future project updates will be discussing the successes and lessons learned during this phase of the project. In early 2011, the project will be analyzed to determine the changes in facility performance, the participation of facilities in sustainable activities and the elements that served as the most significant motivators of behavioral change.

Project Tasks and Milestones

(Reflecting accomplishments for this quarter and projection of activities for next quarter)

<i>Implementation Activities</i>	<i>Start Date</i>	<i>Target Completion</i>	<i>Status/Notes</i>
Develop sustainability calendar	12/2008	12/15/2009	Completed
Develop and send February and March TAP postcard reminders	1/2010	2/2010 3/2010	Postcards were not utilized. Communication was limited to personalized phone calls to target county gas stations and letters to all stations.
Develop a Green Scorecard Tool	2/2010	4/2010	The program will create or obtain a green scorecard that can be sent to the targeted sector so they can gauge their environmental sustainability and identify opportunities that can be implemented at their facility.
Sustainability Workshop	4/2010	6/2010	The program will hold a training session for the targeted sector (50% compliance topics, 50% sustainability topics).
Compliance Workshop and Area Source Outreach	7/2010	9/2010	The program will hold a training session for the targeted sector regarding new area source requirements and highlight common areas of non-compliance.
Case Study with EXCEL Promotion	6/2010	8/2010 and 10/2010	A case study will be developed and distributed highlighting the environmental and economic benefits of sustainability and a push to join EXCEL.
Work with other department staff to integrate sustainable information resources into their existing compliance assistance and outreach efforts		Ongoing	Whenever possible, the program will incorporate sustainability tips and resources into mailings that are being sent to the targeted sector by regulatory programs.

Collaborate and solicit information from stakeholders		Ongoing	All materials developed by the program will be reviewed by department staff to ensure accuracy. Where appropriate, outside stakeholders will also be asked to review materials prior to their use.
<p>Future planned in-depth TAP activities are:</p> <ul style="list-style-type: none"> • Spring – In-depth follow up to Calendar for Franklin County • Summer – In depth follow up to Scorecard and training events for Franklin County. Conduct training events on sustainability • Fall - Send Area Source Rule (Subpart CCCCCC) materials to targeted sector and conduct compliance training. • Winter – send assessment to targeted sector to measure behavioral changes. 			

Financial Report

The division has not had any unanticipated issues related to project funding. It has become evident that this grant will be insufficient to cover all program expenses, but the division has always anticipated that it would be necessary to use some state funds to ensure completion of the overall project. As a result, this funding condition does not pose a threat to the project.

SIG 07 January 1, 2010 through March 31, 2010

Budget Category	Approved Budget	Spent this Quarter	Cumulative to date
Personnel	\$144,000	\$8,262.58	\$111,638.52
Supplies	\$3,000	\$0	\$0
Travel & Training	\$8,000	\$0	\$3,867.67
Contractual	\$2,000	\$0	\$0
Total Direct Costs	\$157,000	\$8,262.58	\$115,506.19
Total Indirect	\$32,000	\$2,153.58	\$30,849.86
TOTALS	\$189,000	\$10,416.16	\$146,356.05

EXAMPLE OUTREACH LETTER

Date

Address

Dear Station Management,

The Division of Compliance Assistance has assembled methods to cut down on operational costs and increase your ability to comply with state and federal environmental laws. A few weeks ago, an Environmental Stewardship Calendar was sent to your facility. We hope you found it helpful. If for some reason your station did not receive a calendar, please contact us and we will gladly send you another.

If your station does have the calendar, please take the time to peruse its many suggestions regarding business operations; it contains tips that will improve your station's performance. As the calendar describes, something as simple as purchasing LED light bulbs, which have four times the life span of fluorescent and metal bulbs, will cut light bulb costs by 75 percent. Other useful calendar suggestions range from starting a recycling program, which saved Lexington stations thousands of dollars on monthly waste fees, to appropriately handling hazardous waste to prevent violations that can result in fines and penalties.

If you have any questions regarding these tips or any environmental issues, please contact us. Our staff is available to assist your business with compliance and environmental concerns. All of our assistance services are free. We can be reached toll-free at 1-800-926-8111 or by e-mail at envhelp@ky.gov.

Sincerely,

EXAMPLE PHONE SCRIPT

Phone Call Script

Hello, is there a manager in the store today I could talk with? Hi, my name is (insert name). I am calling on behalf of the Division of Compliance Assistance. Our objective is to help businesses such as (insert business name) meet federal compliance standards as well as enjoy the market benefits of environmental projects. Last month, we sent (insert business name) a calendar to use as a helpful resource for environmental and economic improvements for your company.

I. Did you receive the calendar?

“No” – I would like to personally drop off a calendar to you. When is a good time for me to stop by? (Make an appointment to visit the business. In this visit, the DCA personnel will draw management’s attention to various calendar items to gauge interest levels and offer encouragement for participating in green endeavors.)

“Yes” – Great!

A. Have you found any of the environmental tips interesting/helpful?

1) “yes”

- a. Gather information
- b. What green items are you looking into?
- c. Do you have a projected deadline for this initiative?

Keep in mind, the whole purpose of the project is to motivate behavioral changes. During the conversation, try to encourage management to follow through with the tip/initiatives of interest.

- 2) “no” (verbal or in the attitude) - Use this time to highlight a few of the more accessible projects. I would draw your attention to the **Growing Green section on the January page. Most stations are unaware that 39% of their energy bill is spent on refrigeration units. At no charge, (insert business name) can become a GreenChill Partner with the Federal EPA. Once a partner, the EPA will provide you with the resources to reduce emissions and save money. Please check this program out; its quick, easy, and as discussed in the calendar would be a perfect marketing tool for gathering additional customers.**

OR

As the Growing Green tip shares, using LED light bulbs is a quick, cheap way to see big savings on energy output as well as money spent on light bulbs.

OR

Use other topics of discussion pertinent to the conversation and highlighted in the calendar on January-April pages. Examples include but are not limited to: preventing spill tips, recycling universal waste and locally captured materials, and marketing environmental initiatives.

Are there any questions I can try to help you answer?

“Yes”: Take down information and make them aware of the other assistance programs available. If you don’t know the answer, don’t be afraid to let them know you will get back to them.

II. Closing dialog

- A. If there was a discussion on project implementation: **We love to hear about your interest in (insert environmental interest). (Insert business name), is on the right track. (Insert discussion points such as, the LED implementation you mentioned is a great project to have done by June. Please contact me when this is finished so that we can get you connected with the KY EXCEL Program.) Congratulations on your efforts. If you have any questions, concerns, or need anything along the lines of environmental management, please do not hesitate to get a hold of me at the Division of Compliance Assistance. (Insert contact information).**

- B. Closing if the conversation did not include project implementation: **Thank-you for your time today. (Summarize discussion points.) We look forward to staying in touch with you. If you have any questions, concerns, or need anything along the lines of environmental management, please do not hesitate to get a hold of me at the Division of Compliance Assistance. (Insert contact information).**

Reference the following strategies and dialogs for assistance.

- I. If necessary, provide additional information management may need to expedite a project; for example, **LED lights can be purchased at your local Wal-Mart or to reduce refrigeration emissions and costs check out the EPA’s Green Chill Program online.**

- II. Another way to encourage action is to introduce KY EXCEL: **“these projects will qualify (insert business name) for the KY EXCEL program. At no charge to (insert business name), the State of Kentucky will recognize your environmental efforts through KY EXCEL. It’s a great way to advertise your hard work**

and let the public know you not only care about them but the world they live in.

Depending on the conversation, another avenue to provide genuine customer service is to offer additional tips; for example, **“Most businesses have found it lucrative to assemble a “green team” where environmental projects can be discussed and tasks to accomplish goals assigned. Employees have found this to be an easy and fun way to “go green”. From what I know of (insert business name), this approach would aide you in these projects.”**

EXAMPLE COMMUNICATION TRACKING DATABASE SCREENSHOT

The screenshot shows a Microsoft Access database window titled "Microsoft Access - (Contact Log)". The main window title is "Green Gas Station Project". The form is titled "Contact Log" and contains the following fields and controls:

- Station Contact Name:** Text field
- Station Contact Name Type:** Dropdown menu
- Contact Phone:** Text field
- Date:** Text field
- Type of Contact:** Dropdown menu with options: Contact Business, Contact Email #1, Contact Email #2
- Project Product:** Dropdown menu with options: Received Product, Using Product, Primary Barrier
- Primary Interest:** Dropdown menu
- Primary Level of Interest:** Dropdown menu
- Secondary Interest:** Dropdown menu
- Secondary Level of Interest:** Dropdown menu
- Primary Compliance Interest:** Referred to ECAP, Referred to EXCEL
- Employee:** Request Site Visit
- Comments:** Text area

Record navigation: Record 14 of 52. Form View.