Project Narrative Statement/Workplan
State Innovation Grant Program

A. Project Title: Nevada Environmental Results Program (NVERP) for the Dry Cleaning Sector

B. Applicant Information:

Nevada Division of Environmental Protection
901 S. Stewart St., Ste. 4001
Carson City, NV 89701-5249

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Geographic Area of NVERP: Clark and Washoe Counties, NV

C. Funding Requested: $203,000

D. Project Period

May 1, 2006 to April 30, 2009 (Based on March 1, 2006 date of approval).

E. Qualifications

Jim Trent, Grant Manager –RCRA grant manager for NDEP.

Evan Chambers, NDEP Project Manager –hazardous waste inspector for NDEP.

Sub-grant:
NDEP will establish a sub-grant (state inter-local contract) with the Business Environmental Program of the Nevada Small Business Development Center, University of Nevada Reno. This funding will provide support for the following personnel.

Kevin Dick, BEP Project Manager – Director of the Business Environmental Program (BEP). Nevada Certified Environmental Manager. Approximately 10% FTE of this position devoted to NVERP. Mr. Dick has been responsible for statewide delivery of environmental compliance assistance and pollution prevention services through NDEP contract funding and EPA grant funding since 1991. The program has provided assistance services and compliance seminars to dry cleaners. From 1997 through 1999 BEP was responsible for leading implementation of a national Association of Small Business Development Centers Garment Cleaning Initiative, "*Garment Cleaning and the Environment: Surviving Now and in the Future*." The project was funded by SBA with Design for Environment funds provided by USEPA. The project involved SBDC staffing at garment cleaning trade show booths, and development and delivery of eighteen seminars across the country addressing EH&S compliance and performance issues of existing and emerging garment cleaning technologies.

Two BEP Hazardous Waste Pollution Prevention Specialists at approximately 25% FTE will work on the NVERP. In addition, a BEP Contract and Project Management Specialist at approximately 5% FTE will work on the NVERP.

F. Total Project Cost.
The total project cost is projected to be $389, 248.

G. Detailed Itemized Budget.

AGENCY	EPA GRANT FUNDS	LEVERAGED FUNDS	TOTAL
NDEP	**$10,000**	**$40,000**	**$50,000**
Personnel	6,154	24,616	
Fringe	1,846	7,384	
Indirect	2,000	8,000	
NSBDC-BEP			
Contractual	**$193,000**	**$26,248**	**$219,248**
Washoe County District Health Department		**$45,000**	**$45,000**
City of Reno		**$20,000**	**$20,000**
City of Sparks		**$15,000**	**$15,000**
Clark County Health District		**$40,000**	**$40,000**
Total	**$203,000**	**$186,248**	**$389,248**

1) **Current Situation and Need**

The population of Nevada is predominantly urban and concentrated in the metropolitan areas of Reno/Sparks in Washoe Co. and Las Vegas/Henderson in Clark Co. Eighty-seven percent of Nevada's population resides in these two counties. These areas are selected for the ERP implementation because dry cleaners are concentrated in these communities, and they are subject to regulation from local POTW pretreatment programs, local air quality management programs, and hazardous waste management programs of the district health departments. Over the past several years dry cleaners have become a focus of NDEP and local agencies in Washoe County. The State legislature established a remediation district in Washoe County with a tax assessment that is used to investigate and remediate historic PCE contamination of groundwater in the Truckee Meadows. The remediation fund is for historic contamination and sewer sampling in the area has found elevated levels of PCE in sewers downstream of dry cleaners (similar concerns about PCE contamination near primary sewer lines in Clark County also exist). The attention to the dry cleaning sector that resulted from this has resulted in the local agencies working together in seeking to improve environmental performance of the dry cleaners in order to protect

groundwater from potential contamination. This provides a unique opportunity to build on the state ERP experiences of MA and MI, and undertake strategic innovation to develop a locally implemented ERP in Washoe County and to utilize the process and lessons learned from the Washoe Co. ERP to develop a similar multi-agency, multi-media program in Clark Co. It is anticipated the baseline compliance rate in Washoe County will be higher than Clark County based on the attention to dry cleaners that has occurred there to date. If this is correct, the compliance and environmental outcome of the ERP in Clark County is expected to be greater.

2) Objectives and Public Benefits

The Nevada Division of Environmental Protection (NDEP) proposes to replicate and further evaluate the dry cleaning environmental results program (ERP) developed by Massachusetts, and being implemented in Michigan.   The State seeks to further innovate on the ERP and demonstrate a new application of the dry cleaner ERP by engaging local single media agency programs in an integrated multi-agency multi-media ERP. The project will provide the state and local agencies with experience in developing and implementing an ERP and in multi-agency collaboration to address improvement of environmental regulation and environmental performance of a particular sector. The ERP that NDEP proposes will involve the Nevada Small Business Development Center (NSBDC) Business Environmental Program (BEP) working with the state and local environmental programs to establish a baseline of drycleaner environmental compliance and performance, outreach and assistance to dry cleaners, a multi-media self-certification program for dry cleaners, and follow-up assessment that measures and reports improvements in dry cleaner compliance and environmental performance in the metropolitan areas of Reno/Sparks in Washoe County, and N. Las Vegas/Las Vegas/Henderson in Clark County, Nevada. The ERP will address regulatory requirements established under the Resource Conservation and Recovery Act (RCRA), the Clean Water Act (CWA), and the Clean Air Act Amendments (CAAA).

Timeline:
A project period of three years is proposed in order to establish baseline, self-certification, and post certification metrics and to recruit participation in the program to achieve measurable results. An overview of the project timeline and task responsibilities is provided below. A more detailed timeline excerpt from the Quality Assurance Project Plan (QAPP) is provided at the end of this section..

Year One:
Washoe Co.:
- Establish Washoe Co. state/local agency ERP workgroup
- Announce project, create ERP stakeholder focus group
- Develop multi-media inspection checklist and EBPIs
- Train inspectors on checklist/EBPIs
- Conduct baseline inspections (local agencies)
- Compile inspection results
- Develop compliance manual and compliance forms
- Deliver Dry Cleaning compliance/BMPs workshop with training on manuals and forms

Clark Co.:
- Establish Clark Co. state/local agency ERP workgroup

Year Two:

Washoe Co.:
- Coordinate Washoe Co. state/local agency ERP workgroup and activities
- Implement compliance self-certification/return to compliance form program
- Compile form results
- Targeted inspections of dry cleaners

Clark Co.:
- Expand project to Clark Co.
- Coordinate Clark Co. state/local agency ERP workgroup and activities
- Announce Clark Co. project, create ERP stakeholder focus group
- Customize multi-media inspection checklist and EBPIs for Clark Co.
- Conduct Clark Co. baseline inspections (local agencies)
- Customize compliance manual and compliance forms for Clark Co. jurisdictions
- Deliver Clark Co. Dry Cleaning compliance/BMPs workshop with training on manuals and forms.

Year Three:
Washoe Co.:
- Coordinate Washoe Co. state/local agency ERP workgroup and activities
- Implement compliance self-certification/return to compliance form program
- Compile form results
- Post-certification project outcome inspections of dry cleaners
- Compile project outcome results

Clark Co.:
- Coordinate Clark Co. state/local agency ERP workgroup and activities
- Implement compliance self-certification/return to compliance form program
- Compile form results
- Post-certification project outcome inspections of dry cleaners
- Compile project outcome results

Year Two or Three:
Host ERP information exchange national meeting.

Roles and Responsibilities:
NDEP will serve as the lead Agency, grant recipient, and administrator.

Through establishment of a sub-grant inter-local agreement between NDEP and the NSBDC-BEP, University of Nevada, Reno (UNR), BEP will:
- coordinate state/local government/stakeholder participation and project implementation,
- implement quality assurance project plan and data collection methodology for project measurement
- develop program compliance/best management practices manuals,
- develop compliance self-certification/return-to-compliance forms/checklists,
- propose key environmental business performance indicators (EBPIs),
- deliver training workshops to dry cleaners and inspectors,
- track, compile, and report program results
- host national ERP information meeting.

Local agencies will participate in the project through:
- Involvement in local implementing agencies workgroup
- Input to and review of manuals, compliance forms, EBPIs, multi-media inspection checklists
- Conducting baseline inspections and reporting results to NDEP
- Conducting post-certification final outcome measure inspections and reporting results to NDEP

NDEP will:
- Participate in stakeholder meeting/implementing agency workgroups
- Provide input to and review of manuals, compliance forms, EBPIs, multi-media inspection checklists
- Assist in recruiting local agency participation for Clark Co. project implementation.
- Provide reported dry cleaner inspection data to BEP
- Evaluate project results/experiences to assess advantages/opportunities of ERP approach to other sectors or to support innovative problem solving in NDEP approaches to environmental protection.

The ERP will be implemented by leveraging the extensive environmental compliance and pollution prevention experience that has been developed through the partnership program that BEP has implemented with NDEP since 1988. Through this NDEP funded partnership, and with additional pollution prevention grant funding provided by EPA, BEP has developed experience, expertise, and an environmental assistance delivery infrastructure for the State of Nevada. NDEP will provide sub-grant funding to BEP to coordinate implementation of the program and undertake development of quality assurance, compliance assistance, self-certification, multi-media inspection materials and outreach and training associated with the ERP. BEP will also propose draft Environmental Business Performance Indicators (EBPIs), for review and approval by NDEP and participating local agencies, and for use as additional performance indicators for the ERP.

BEP will engage NDEP, local participating agencies, and representatives of the dry cleaning community in a review and finalization process for the ERP materials developed. BEP will deliver training on environmental compliance/pollution prevention/best management practices (based on the content developed in the compliance manual), compliance self-certification, multi-media inspections, EBPIs, and the overall ERP objectives to the dry cleaners, and participating agency representatives in the Washoe and Clark County metropolitan areas.

Table 2: Schedule of Major Project Tasks

Task Name	Task Description	Start Date	End Date
Outreach	Outreach to internal and external stakeholders (including targeted facilities) about the project.	5-1-2006	4-30-2009
Facility Identification	Compile a list of PCE dry cleaning facilities from reliable sources.	5-1-2006	7-1-2006
Statistical Methodology	Finalize the methodology to drive performance measurement and analytical tasks.	6-1-2006	8-1-2006

Data Input and Management	Development of database and data input process to cost-effectively input and manage the NVERP data, including primary and secondary data. Primary data consists of data from inspection reports and facility forms (including self-certification forms). Secondary data sources include lists of facilities from regulatory or other databases.	5-1-2006	10-1-2006
Develop Inspection Forms	Multi-media inspection forms and Environmental Business Performance Indicators (EBPIs) developed and training provided to Inspectors. Washoe County Clark County	 6-1-2006 3/1/2007	 11-1-2006 7/1/2007
Baseline Inspections (establishing a performance measures baseline)	Inspections at facilities to establish a baseline for performance measures. All facilities will be inspected providing a census data collection. Washoe County Clark County	 11-1-2006 7/1/2007	 2/28/2007 12/1/2007
Baseline Analysis	Analysis of inspection data to establish a baseline for the project's performance measures. Washoe County Clark County	 3-1-2007 12-1-2007	 6-1-2007 4-1-2008
Assistance Materials	Develop workbooks, informational/assistance materials, and workshop curriculum. Washoe County Clark County	 9-1-2006 6/1/2007	 2-13-2007 12/1/2007
Facility Assistance	Delivery of compliance/technical assistance to facilities, which is expected to take the form of workbooks, fact sheets, workshops, and on-site assistance. Washoe County Clark County	 3-1-2007 12/1/2007	 2-28-2009 2/28/2009
Self-certification	Implementation of a voluntary facility self-certification approach. Self-certification refers to the submission of a record of a facility's compliance and beyond-compliance practices. Washoe County Clark County	 6-1-2007 3/1/2008	 10-1-2008 6/1/2008
Analysis of Self-certification Results	Analysis of self-certification data, with primary purpose of identifying opportunities for selective follow-up (next step). Washoe County Clark County	 10-1-2007	 11-1-2008
Selective Follow-up	BEP will follow-up with self-certifying facilities, based upon analysis of self-certification data and return to compliance forms to provide assistance as appropriate.	11-1-2007	2-28-2009

Post-Certification Inspections	Inspections at facilities to establish whether sector performance measures (and other measures) have changed since the baseline. Inspection data also used to cross-check self-certification data at inspected facilities. All facilities will be inspected providing a census data collection.		
	Washoe County	11-1-2008	2/28/2009
	Clark County	9-1-2008	1/31/2009
Data Analysis	Analysis of baseline, self-certification, and post-certification data to understand change in facility performance and overall outcomes of interest.	3-1-2009	5-31-2009
Reporting to the USEPA	Reporting shall include quarterly, annual, and final reports.	6-1-2006	7-31-2009

Note: The schedule provided is ambitious in order to achieve the full scope of the project including post-certification inspections during the three year duration of the grant. Schedule timelines for specific tasks may be adjusted as the project is implemented. The overall project schedule will be adjusted as necessary based on the date of the grant award.

3) Indicates Compliance with Requirements

The project budget is justified based on the scope of work that will be implemented. The project will assist the dry cleaners with compliance with environmental regulations. The NDEP and BEP will comply with applicable OMB regulations in conducting the project. Quality Assurance requirements will be addressed through the Quality Assurance Project Plan (an initial draft of which is attached to the grant proposal.)

4) Reflect Environmental Outcomes

The Nevada ERP will measure improvement in compliance and in EBPI scores from baseline to post-certification inspections, and establish a framework in which dry cleaner performance can be tracked in future years after the grant funding ends. In addition, the program will utilize the approach developed in Massachusetts in which quantifiable environmental outcomes are estimated based on quantities of emissions prevented through improvement of compliance or best management practices. For instance, in dry cleaning, improved compliance in leak detection requirements can be used to estimate a reduction in quantity of PCE emitted to the air. Increased adoption of best management practices for waste waters can prevent soil and groundwater contamination. The baseline and post-certification inspections will collect the data necessary to measure the compliance improvement, and estimate quantitatively the environmental outcome of the ERP. A goal of a 25% increase in environmental compliance and 20% increase in best management practices as determined by EBPI scores is established. The level of improvement that is measured in Washoe County may be lower due to outreach work that has already been done with the dry cleaning community. This is uncertain, and the Washoe Co. and Clark Co. results will be compared.

The project will measure improvements in compliance and best management practices, and provide quantifiable estimates of emissions that were prevented. Baseline measures will be developed in the first year of the project in Washoe County and in year two in

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Clark County. Self Certification will follow, and post-certification inspections of drycleaners will occur during year three. Baseline and post certification measures of compliance rate and environmental performance will be achieved during the project implementation. A framework for continuing to assess and measure dry cleaner performance after the grant project will be established.

Reports will include activities conducted, participation in focus/workgroups/workshops, and materials developed, as interim surrogate measures of performance. Data collected from the base-line and post-certification inspections, and self-certifications will be reported as it is collected and compiled, and quantitative estimates of environmental outcomes are calculated.

The project is intended to provide data which supports determination of the level of compliance with environmental management regulations and practices. If the level of compliance demonstrated for management of PCE wastes and wastewaters is found to be high, then it is reasonable to conclude that dry cleaners as a group are not contributing potential ongoing soil or groundwater contamination from releases to the sewer line or other illegal dumping. In Washoe County, local agencies have embarked on a sewer sampling program addressing dry cleaning locations. Ideally this data will confirm that sewer discharge is not occurring. However, due to the extent of soil and groundwater contamination (and shallow depth to groundwater) there is some uncertainty surrounding PCE detection in the sewer lines, whether the PCE was discharged to the sewer, or entered the sewer from surrounding contaminated groundwater or soils. A goal of the project is to demonstrate the level of compliance of drycleaners to help ensure they are not contributing to legacy contamination. However, the project is not designed or intended to result in remediation of soil or groundwater contamination that has occurred, or is occurring, as a result of legacy releases of PCE. This remediation is being addressed separately through the Washoe County Water Resources Central Truckee Meadows Remediation District.

The proposed ERP is aligned with EPA's Innovation Strategy addressing the priority areas of maintaining water quality by preventing the contamination of drinking water, addressing concerns of PCE contamination from sewer lines, and the development and demonstration of an environmental results program that is designed to use outreach, education, assistance, and self-certification to improve multi–media environmental performance across the dry cleaning sector, as an alternative to permitting, to produce superior results to conventional approaches to environmental control. The ERP objective of improved multi-media compliance and environmental performance is aligned with EPA's Strategic Plan in the following areas:

Goal 1: Clean Air and Climate Change
> Sub Objective 1.1.2: Reduced risk from Toxic Air Pollutants.
- Specifically the project will reduce air emissions of PCE through improved compliance with the CAAA NESHAP for PCE Dry Cleaning.

Goal 2: Clean and Safe Water
> Objective 2.1: Prevent Contamination of Sources of Drinking Water, and
> Objective 2.2: Protect Water Quality.

- Specifically, the project will improve compliance with RCRA and CWA pretreatment programs to reduce potential for groundwater contamination with PCE.

Goal 3: Land Preservation and Restoration

Objective 3.1: Reduce adverse effects to land by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.

- Specifically, the project will promote best management practices and RCRA and CWA compliance for listed wastes and wastewaters to reduce the potential for soil contamination, and to minimize waste generation.

Goal 4: Healthy Communities and Ecosystems

Sub Objective 4.1.4: Protect human health, communities, and ecosystems from chemical risks and releases through facility risk reduction efforts.

- Specifically, the project will protect human health from chemical risks associated with PCE by improving compliance and management practices at facilities that are the primary business users of PCE in Nevada.

Goal 5: Compliance and Environmental Stewardship

Objective 5.1: Improve compliance.

Objective 5.2: Improve environmental performance through pollution prevention and innovation.

- Specifically, the project will provide outreach, education, and a self-certification process to improve multi-media compliance and environmental performance in the dry cleaning sector. This will be an innovative multi-agency project that includes base-line and post-certification inspections to measure improvement of compliance and management practices.

5) Transferability

BEP will take the lead role in coordinating and sharing information with other states implementing ERPs and engaged in EPA's Innovation Strategy efforts. In addition, BEP is responsible for the Western Regional Pollution Prevention Network (WRPPN), a strategic alliance of Region 9 pollution prevention programs, and one of eight national EPA funded Pollution Prevention Resource Exchange (P2Rx) Centers, that facilitates communication among, and convenes pollution prevention programs in Arizona, California, Hawaii, and Nevada. BEP is uniquely positioned to leverage the EPA and matching funds invested in WRPPN to disseminate ERP information to Network participants in Region 9 and to other P2Rx centers. Many local agencies are delegated responsibilities for implementing environmental regulatory programs in the Region 9 states, and the local agency ERP model developed through this project is anticipated to be particularly applicable to them.

In addition, to share information among state programs implementing ERPs and to allow programs in the western U.S. to learn more about ERP implementation, Nevada proposes to host a meeting of state ERP programs and those interested in ERPs during year two or three of the project (timing to be determined based on discussions with the National Center for Environmental Innovation (NCEI)). Participant support funding is included in the proposal to provide travel support funding for some of the meeting attendees.

The dry cleaning ERP will provide NDEP with an opportunity to pilot this innovation in Nevada, gain experience, and assess opportunities to apply the approach to other sectors. Opportunities exist to apply ERP in Nevada to additional sectors in which the benefits of the statistical sampling approach and self certification protocol could provide substantial administrative efficiency and

cost benefits to both NDEP and the regulated community. Additional opportunities for duplication and innovation upon this approach in the western U.S. are substantial.

6) Public Involvement

Dry cleaners will be involved in the process as primary stakeholders. Several have already indicated their intention of participating if funding is awarded. Dry cleaners expect to benefit from greater certainty of their compliance requirements and knowledge of best management practices. They expect to also benefit from the ability to inform their customers of the ERP, and their participation in it. The results of the ERP will allow information about the sector's compliance and environmental management practices to be communicated to the public which is expected to benefit the public, dry cleaners, and the regulatory agencies. Community representatives from the Truckee Meadows and Southern Nevada Water Authorities and local chambers of commerce will also be invited to participate in the stakeholder focus groups. The project will seek to promote the dry cleaner ERP in the community and encourage consumer consideration of participation in the ERP when obtaining dry cleaning services. BEP will issue press releases and pursue media coverage to engage and inform the communities with information about the project. Press releases will be issued and media coverage of the ERP events, such as the training workshops, will be sought.

Program/Project Description Worksheet I

Program/Project Mission or Goal: Improve, Maintain, and Measure dry cleaner compliance and performance**.**

Resources & Partners	Activities	Outputs	Customer Reached	Outcomes		
				Short Term (attitudes)	Intermediate Term (behavior)	Long-Term (condition)
NDEP – 1 staff (grant and contract oversight, and inspection staff), $10,000	Grant Administration Participation in multi-agency meetings and project promotion. Assistance with inspection/measurement data management and quality assurance.	Inter-local agreement with NSBDC. Inspection/performance indicator data to NSBDC. Engagement of Clark County local agencies.	NSBDC Local Agencies Dry Cleaners	Improved knowledge of ERP's and potential benefits within the agency.	Consideration of application of ERP to other sectors. Local agency relationships and collaborations are enhanced.	ERP becomes a standard tool for maintaining a high level of compliance among diffuse, small sources.
NSBDC – 4 staff $190,000	Coordinate participating agencies. Develop compliance manuals. Establish dry cleaner performance measures. Develop inspection protocols. Develop Self certification forms. Provide training and technical assistance to cleaners and inspectors. Measure compliance and performance. Establish Focus groups.	Compliance Assistance Materials and self certification forms. Inspection protocols and performance indicators. Trainings seminars. Local agency project team meetings. Report on dry cleaner compliance and performance rates and trends. Focus group meetings of stakeholders.	Dry Cleaners State and Local Agencies	Dry cleaners identified and stakeholders engaged in discussion groups. Dry cleaners aware of compliance obligations, and best management practices, and assistance resources available.	Dry cleaners comply with record keeping and reporting requirements. Dry cleaners adopt and maintain best management practices. Performance based on self-certification program is assessed.	Dry cleaner environmental compliance and enforcement is improved, or maintained at a high level. Sewer discharge of Perc contaminated wastewaters is reduced/prevented. If elevated perc levels are found in sewers, they are not from dry cleaners.
Local Agencies – Inspectors, Inspection Operating Budgets	Participate in project meetings and provide input on project and documents. Conduct inspections. Report inspection results.	Meetings attended. Comments provided on materials developed. Inspectors trained on inspection protocol and performance indicators. Inspections conducted. Inspection data and performance indicators provided for measurement.	Dry Cleaners Other inspectors	Improved compliance inspections. Inspection data for initial benchmarking of compliance/performance.	Interagency referrals from inspections is improved. Areas of performance problems are recognized.	Improved interagency collaboration/working relationships. Follow-up inspections provide data to measure environmental improvement. Inspection efforts are better focused on problem areas.