

US EPA ARCHIVE DOCUMENT

## **FY 2007 State Innovation Grant Pre-Proposal - Idaho**

Primary Project Category: National Environmental Performance Track and State Performance-Based Environmental Leadership Programs.

### **1. Project Summary**

Project Title: Increase participation in environmental performance leadership programs in Idaho by enhancing and institutionalizing support tools for potential applicants.

State Agency Applicant: Idaho Department of Environmental Quality (IDEQ)

State Project Manager:

Helen Rigg, Director Idaho GEMStars

720 Park Blvd., Suite 255, Boise, ID 83712

Phone: (208) 364-9900 Fax: (208) 344-4972

E-Mail: [hriigg@idahogemstars.org](mailto:hriigg@idahogemstars.org).

Total Project Cost:

*[Budgetary Information Withheld by U.S. EPA]*

Project Period: October 2007 through September 2010 (or 3 years from the date of award)

Project Summary Statement: The project targets increasing participation in Idaho's existing environmental performance-based leadership program, Idaho GEMStars and also EPA's National Environmental Performance Track (NEPT). Key support tools are needed to support potential applicants in efficiently achieving membership requirements and maximizing their environmental results. The project addresses this need through three primary tasks: 1) Develop procedures and tools to increase efficient coordination and synergy between GEMStars and NEPT, 2) Provide applicant support tools and 3) Further institutionalize environmental management systems and other environmental performance tools into the culture and education programs at Idaho's universities.

Relationship to Other Federal Programs: The project is not being implemented in cooperation with nor funded by other federal or EPA programs. However, the project will be implemented in a spirit of collaboration with complementary programs at IDEQ (some of which receive federal funding), other state agencies and universities, and with U.S. EPA as well as other federal agencies with operations in Idaho.

Regulatory Flexibility: No specific regulatory flexibilities are presently identified as necessary in order to implement this project.

Management Support: The Director of the Idaho Department of Environmental Quality is aware of and supports this project. If this project is selected as a finalist, a letter of commitment from the appropriate IDEQ senior management representative will be submitted with the final application package.

## 2. Pre-Proposal Project Narrative

### a. **Project Description**

Idaho GEMStars is one of the early state environmental performance leadership programs. GEMStars was developed for the Governor by a broad based statewide committee and introduced in September 1999. The project focus is providing and institutionalizing support tools to increase program membership. GEMStars members must implement pollution prevention (P2) practices that go beyond regulatory requirements. Thus, increased participation will result in documented improvements to environmental quality. Increasing membership supports long term program sustainability and building a culture of environmental performance.

Interest in program membership is high. In order to convert that interest to membership, several challenges need to be addressed. Many medium and small entities struggle to complete their applications since they do not have dedicated (P2)/sustainability coordinators or environmental managers. GEMStars is not staffed to provide special assistance to these participants. Support tools are needed to empower and assist them in efficient implementation of their P2 initiatives. At the same time many large mainstream companies actively participate in, and support the GEMStars program without formally applying for membership. Many of these companies may also be potential NEPT members. Support tools, process efficiencies and increased synergy between the two leadership programs will help facilitate and encourage completion of the membership application. Support tools will be institutionalized at GEMStars and through the university partners. The reality is that dedicated innovators will complete their membership requirements without special assistance, but mainstream entities need support. This project addresses this barrier to building membership through three primary tasks.

#### 1) Develop procedures and tools to increase efficient coordination and synergy between GEMStars and NEPT.

GEMStars has partnered with NEPT since its inception and has a prototype refinement of its middle tier that includes a track option similar to NEPT to increase compatibility between the two programs and simplify member participation in both programs. A MOU and standard procedures are needed to solidify the partnership between Idaho GEMStars and NEPT, to achieve efficiencies for implementation of both programs in Idaho and help create efficiencies in the application process for those that are interested in both programs.

#### 2) Provide applicant support tools.

Discussions with potential applicants have indicated a need for tools to assist them in the efficient selection and implementation of pollution prevention initiatives and application preparation. This includes considering other certification programs as surrogates for selected GEMStars criteria where appropriate. Small and non-regulated businesses need simple checklists and “cookbooks” to help them identify appropriate P2/sustainability practices, maximize effectiveness and complete their applications efficiently. Some added staff assistance to this sector will be piloted to initially complement the tools and better assess the results.

#### 3) Institutionalize environmental management system (EMS) and other environmental performance training into the culture and education programs at Idaho universities.

Idaho may be the only state to have a legislative directive in support of sustainability at its universities. As founding GEMStars partners they are ideally suited to institutionalize environmental performance throughout their culture and educational offerings. Offering web-based courses on environmental performance tools through the university system integral to the GEMStars strategy to institutionalize accessible training throughout Idaho and ensure new

graduates bring this knowledge to the workplace. A scalable course will allow key components to be integrated cross discipline further complementing sustainability and GEMStars goals.

### Project Milestones and Schedule

(Target date refers to month completed from project start-up unless otherwise indicated)

Project Tasks and Key Milestones	Target Date
<p><b>1. Develop procedures and tools to increase coordination and synergy between Idaho GEMStars and NEPT.</b></p> <ul style="list-style-type: none"> <li>○ Update draft MOU between Idaho and EPA regarding NEPT and GEMStars and identify appropriate signatories.</li> <li>○ Develop streamlined procedure and application for GEMStar Tier 2 membership for NEPT members.</li> <li>○ Prepare protocol for coordination on inspections and compliance assurance of NEPT facilities.</li> <li>○ Develop pilot internal IDEQ guidance for implementation of adopted RCRA incentives. Distribute information.</li> <li>○ Assist EPA Region 10 in planning Regional NEPT event(s).</li> <li>○ Participate in NEPT related conferences and events.</li> </ul> <p><i>Task 1 Outputs: Completion of MOU; completion of streamlined GEMStars application for NEPT members; completion of IDEQ internal guidance on RCRA incentive implementation; train RCRA program personnel on guidance (# attending), and participation in NEPT related events (# of events attended).</i></p> <p><b>2. Develop and provide tools to support increased participation in Environmental Performance Leadership Programs (i.e. Idaho GEMStars and NEPT).</b></p> <ul style="list-style-type: none"> <li>○ BSU hires GEMStars 2-year position to deliver focused assistance and outreach to potential program participants.</li> <li>○ Universities provide summer interns to assist small businesses in target geographic areas.</li> <li>○ Providing P2 performance assistance to small business applicants.</li> <li>○ Form GEMStars Advisory Team focused on increased participation and long-term support.</li> <li>○ Complete simple checklist and idea cookbook for small and non-regulated applicants and make available on website.</li> <li>○ Consider options and develop protocol for more efficient processing of increased applications.</li> <li>○ Host workshop/ recruitment event for Idaho entities on NEPT and GEMStars with EPA Reg 10 (invite adjacent state businesses).</li> <li>○ Identify areas where program resource limitations will limit continued participation/membership expansion following this project and identify long-term options to address.</li> <li>○ Identify and prioritize existing environmental certification and performance programs in Idaho that potentially may be surrogates for specific GEMStars criteria.</li> </ul>	<p>Month 4</p> <p>Month 20</p> <p>Month 14</p> <p>Month 10</p> <p>As Needed. Annually</p> <p>Month 12</p> <p>Each summer.</p> <p>Month 8</p> <p>Month 4</p> <p>Month 13</p> <p>Month 12</p> <p>As coordinated with EPA.</p> <p>Month 26 and Month 36</p> <p>Month 29</p>

<ul style="list-style-type: none"> <li>○ Deliver web-course identified in Task 3 for accessible and widespread EMS/environmental performance training.</li> </ul> <p><i>Task 2 Outputs: Advisory committee meetings conducted; assistance tools developed; workshop(s) and recruitment events hosted; number of certification/performance programs considered for potential GEMStars criteria surrogates; webcourse(s) offered; number of individuals attending course(s) (# registered).</i></p>	<p>---</p>
<p><b>3. Institutionalize EMS training and other environmental performance tools into the culture and education programs at Idaho’s universities.</b></p>	
<ul style="list-style-type: none"> <li>○ Establish U of I focus group to provide input on web-based EMS/environmental leadership course utilizing existing campus sustainability committee structure.</li> </ul>	<p>Month 5</p>
<ul style="list-style-type: none"> <li>○ Assign faculty lead for web-course development.</li> </ul>	<p>Month 6</p>
<ul style="list-style-type: none"> <li>○ Develop web-course on EMS/environmental performance leadership.</li> </ul>	<p>By Month 21</p>
<ul style="list-style-type: none"> <li>○ First offering of EMS/environmental performance web course.</li> </ul>	<p>By Fall Semester 2009</p>
<ul style="list-style-type: none"> <li>○ Assist Idaho university representatives in participating in AASHE sponsored sustainability training opportunities.</li> </ul>	<p>Annually.</p>
<ul style="list-style-type: none"> <li>○ Conduct Idaho University Summit to share information and environmental/sustainability results and conduct next steps planning. Invite partner institutions.</li> </ul>	<p>Summer 2009 (tentative).</p>
<p><i>Task 3 Outputs: # of times course offered and enrollment; university sustainability networking and training events attended; # of courses scalable components integrated into, % of target universities participating in training; % of Idaho Universities and colleges participating in Summit.</i></p>	
<p><b>4. General Project Administration</b></p>	
<ul style="list-style-type: none"> <li>○ Idaho DEQ receives funding award</li> </ul>	<p>10/07</p>
<ul style="list-style-type: none"> <li>○ Idaho DEQ issues Boise State University GEMStars support contract</li> </ul>	<p>Month 1</p>
<ul style="list-style-type: none"> <li>○ Idaho DEQ issues University of Idaho EMS Web-course contract</li> </ul>	<p>Month 4</p>
<ul style="list-style-type: none"> <li>○ Prepare RFP and select sub-contractor to assist with development of select participation tools, protocols and guidance.</li> </ul>	<p>Month 8</p>
<ul style="list-style-type: none"> <li>○ Quarterly Reports</li> </ul>	<p>Quarterly as negotiated.</p>
<ul style="list-style-type: none"> <li>○ Detailed Final Project Report</li> </ul>	<p>90 days from completion</p>
<p><i>Task 4 Outputs: Contracts issued; RFP(s) issued; Quarterly Reports submitted and Final Report completed on schedule.</i></p>	

The GEMStars program has evolved to meet changing state needs while remaining true to the core principles that help differentiate it from other similar programs including the following:

- GEMStars is housed and operates outside of, but in cooperation with, the traditional state environmental regulatory agency.

- Operations, equipment and support are provided by a diverse partnership of state agencies and academic institutions resulting in both efficiencies and investment.
- The philosophy is that any entity can initiate actions to prevent pollution and participation of both regulated and non-regulated entities is encouraged. This includes small businesses, farmers and ranchers, government agencies, schools and non-profits.
- Membership is not an event, but a commitment to a culture of continuous improvement.
- Membership criteria support integrated, multi-media actions and also address non-regulated environmental concerns (e.g. resource conservation, P2, sustainability, and ecosystem and community health).

GEMStars and DEQ have the experience and resources to deliver this project successfully. Program participants have demonstrated success in achieving voluntary environmental improvements in conjunction with economic savings and community benefits. Many founding advisory committee members continue to be active and contribute perspective and institutional knowledge to the program. The GEMStars Director is an experienced DEQ manager on an extended assignment to the program per the requested of advisory committee leadership. She has extensive experience in working with regulated and non-regulated entities, communities, volunteer initiatives and the resource industries of Idaho to achieve environmental results.

#### **b. Program Guidelines, Eligibility Requirements, and Selective Criteria**

The proposed project meets all guidelines and threshold criteria and addresses the evaluation criteria and qualitative selections factors. The project advances both the Idaho GEMStars and NEPT programs by building membership and developing mechanisms to better integrate and achieve efficiencies and synergy between Idaho GEMStars and NEPT. This will also enhance capacity and understanding in the state media program. The project is innovative in developing tools in support of increasing program participation by “mainstream” entities and institutionalizing the tools within GEMStars and the University system. The tools and efficiencies may also be considered as an “incentive” for program participation. In addition, more efficient delivery and coordination of the RCRA incentive is piloted under this project.

Per Threshold Criterion #1, the project activities are multi-media in nature and fall within the activities authorized under the six specified grant authorities. Activities focus on sharing and gathering information and advancing the knowledge of the regulated and non-regulated community to achieve environmental results. Key products developed under this project and knowledge gained will be shared with others through existing channels that GEMStars and/or DEQ already actively participate in including: the Multi-State Working Group (MSWG), Region 10 P2 Coordinators Committee, regional and national P2 roundtables, Association for the Advancement of Sustainability in Higher Education (AASHE), Idaho Environmental Summit, Sustainable Idaho, Idaho Small Business Development Center, Idaho Environmental Education Association, ECOS and state leadership program participants in NEPT. Key tools will be available on the GEMStars website and the web course will be open to enrollment. Interested parties will be invited to training opportunities and the Idaho University Summit.

The project is based on an integrated, multi-media approach to pollution prevention. The focus is the prevention, reduction and elimination of air, water and solid waste pollution in conformance with Threshold Criterion #2. The application complies with all submission requirements per Threshold Criterion #3.

The project is consistent with EPA’s Innovation Strategy and Strategic Plan and utilizes experience from more than 7 years implementing the GEMStars program as well as the experience of similar programs implemented by other states and EPA. The project supports all 5

of EPA’s strategic goals with particular emphasis on Goal 5, Objective 5.2 regarding preventing pollution and promoting environmental stewardship. It also supports the Cross-Goal Strategies.

The project targets the strategic area of NEPT and state performance based leadership programs. It also supports EMS implementation through the web based training component. It advances both GEMStars and NEPT as described earlier in this section. Creating efficiencies and synergies in the membership criteria with other certification or performance programs can actually provide an “incentive” for participation. The schedule, outputs and outcomes for the project are addressed in the appropriate sections of this proposal. Current GEMStars members have demonstrated direct cost savings as a result of their membership actions. New members should show similar success. Idaho will also realize efficiencies by institutionalizing assistance tools and streamlining processes. The methods for innovation transfer are described under the discussion of threshold criteria earlier in this section.

The proposal addresses EPA Region 10’s interest in formalizing NEPT/State MOUs and in increased state involvement in building NEPT membership in Idaho. These priorities and options to address them have been discussed in conference calls and meetings over the past year. Idaho was one of the first states to adopt and offer NEPT incentives and has previously hosted NEPT workshops. No regulatory flexibility or litigation is foreseen in the implementation of this project. The project will be implemented in a spirit of collaboration with EPA Region 10’s NEPT efforts. Region 10 states and businesses will be invited to participate in workshops of interest. For example, the University of Anchorage is already collaborating with Idaho’s Universities and has asked to participate in any University Summit.

GEMStars represents a rural, fast growing western state’s initiative in next generation environmental protection and P2 empowerment. GEMStars has unique characteristics, including being outside of the state environmental regulatory agency and utilizing partnerships with other agencies and the universities rather than a large stand alone staff. It is an alternative, low cost model for a performance program. The tools in this project provide models for streamlined, institutionalized support to encourage mainstream applicants and efficiencies. Products are readily transferable to other programs. GEMStars is an active participant in diverse partnerships, including the planning committee for the Statewide Idaho Environmental Summit hosted by the five tribal nations of Idaho. GEMStars routinely works with “at risk” rural communities and tribal communities in the interest of furthering P2 environmental justice considerations.

**c. Environmental Outputs**

Outputs are identified by task in the project milestone and schedule table in section 1a.

**d. Environmental Outcomes**

Environmental outcomes are identified in the following table. The list is intended to be illustrative and may be expanded and enhanced during project implementation.

Short Term	Interm. Term	Long Term	Outcome and Measurement Method	Type
✓			# of workshop participants gaining new knowledge regarding GEMStars or NEPT programs (post survey)	#
✓			% of RCRA media program staff with increased understanding of GEMStars/NEPT programs and RCRA incentives (follow-up survey).	QL
	✓		Number of new applicants referred by workshop participants or RCRA program staff.	#
	✓	✓	Increase in numbers of GEMStars and NEPT members in	#

			Idaho (new members approved)	
✓			# of students completing web-based course and businesses attending workshops (registration)	#
		✓	Pollutant reductions, energy savings, resources conserved, cost savings and other measurements documented in GEMStars and NEPT applications.	#
✓			# of new entities registering as GEMStars participants (forms submitted)	#
	✓		% of small business applicants that found P2 checklist/idea cookbook/assistance helpful in targeting environmental improvements and application completion (survey of new applicants once tools are available).	QL
✓			Universities that gained new knowledge and expect to implement new P2 or sustainability related projects or practices as a result of information gained at workshops or trainings (post event surveys)	QL
✓			# of entities seeking/ receiving application assistance	#
✓	✓		Increased program interest from geographic target regions (potential applicants contacted, applications received)	QL

Note: # indicates quantitative measurements and QL indicates qualitative measurements.

**e. Public Involvement**

Adopted NEPT regulatory incentives have previously went through a state public comment process. GEMStars and IDEQ are committed to provide public involvement opportunities should any unanticipated regulatory changes be required as part of this project. Public awareness is integral to the success of the GEMStars program and case studies on the environmental results and business success of members are routinely shared with the public and provided to the media. In addition, one of the mandatory requirements for GEMStars members is to notify their community, customers and clients about their environmental efforts. No controversial issues or potential litigation is anticipated under the proposed project.

**f. Collaborations or Partnerships**

The Idaho GEMStars program was developed in the spirit of collaboration by diverse interests including tribes, non-profits, agencies, universities, citizen groups as well as diverse business and industry. Implementation has depended on this same spirit. In addition, a number of state agencies voluntarily contribute services and/or equipment to GEMStars. Examples include the Idaho Tax Commission (phone system and services), Department of Administration (computer and website support) and Boise State University Small Business Development Center (financial management). Key partners with IDEQ and GEMStars in the implementation of the GEMStars program, and most specifically this project, include the state’s universities (University of Idaho, Boise State University and Idaho State University). They will participate in the implementation of tasks 2 and 3 as described. The GEMStars/EPA collaboration and partnership on NEPT implementation in Idaho will be strengthened through the work outlined under task 1 and also task 2 of this project. Additional partners with direct involvement in this project include the Association for the Advancement of Sustainability in Higher Education (AASHE) who will provide technical advice and support for task 3, existing GEMStars members (responsible for mentoring new members) and the GEMStars review committee (assist in membership application reviews).



### **3. Pre-proposal Budget Summary**

State: Idaho  
Agency: Department of Environmental Quality  
Project Title: Increase participation in environmental performance leadership programs in Idaho by enhancing and institutionalizing support tools for potential applicants.

*[Budgetary Information Withheld by U.S. EPA]*

The estimated level of state leverage funding is offered to demonstrate the state's commitment to moving this initiative forward and is not intended as a project match. Leverage funding includes state and university personnel, travel, supplies, support contracts and operating.

The Grants Administrator and state budget contact for this project is:

Kirby L. Farner  
Environmental Policy Analyst  
Idaho Department of Environmental Quality  
1410 North Hilton  
Boise, ID 83706  
Phone: (208) 373-0100  
Fax: (208) 373-0315  
Website: [www.deq.idaho.gov](http://www.deq.idaho.gov)

**4. Environmental Results Past Performance**

The Idaho Department of Environmental Quality (DEQ) has successfully implemented several projects/programs/assistance agreements within the last three years, including:

<u>Project/Program/Agreement</u>	<u>Awarding Agency</u>	<u>Federal Amount</u>
<i>[Budgetary Information Withheld by U.S. EPA]</i>		
1. Clean Water Act 106, Groundwater	EPA	\$
2. Underground Storage Tank Program	EPA	\$
3. Superfund Multi-Sites	EPA	\$
4. Nutrient Monitoring –Investigations Grant	EPA	\$
5. Clean Water Act Sec 104(b) 3 (2005)	EPA	\$
6. BLM/DEQ Cooperative Agreement	DOI	\$
7. Defense Environmental Restoration	DOD	\$
8. Environmental Permitting and Regulatory	DOE	\$

For each of these project/program assistance agreements, progress has been documented by means of written performance reports as conditioned by the assistance agreement. For example, the programmatic condition listed under Clean Water Act Sec 104(b) 3 (2005) states:

The recipient shall submit performance reports every six (6) months during the life of the project. Reports are due 30 calendar days after the end of each reporting period. Reports shall be submitted to the EPA Project Officer and may be provided electronically.

In accordance with 40 CFR Part 30.51(d) and 40 CFR Part 31.40, as appropriate, the recipient agrees to submit performance reports that include brief information on each of the following areas:

- (a) a comparison of actual accomplishments to the outputs/outcomes established in the assistance agreement work plan for the period;
- (b) the reasons for slippages if established outputs/outcomes were not met;
- (c) additional pertinent information, including when appropriate, analysis and information of cost overruns or high unit costs.

In addition, to the periodic reports, the recipient shall immediately notify the EPA Project Officer of developments that have a significant impact on the award-supported activities. In accordance with 40 CFR Part 30.51(f) and 40 CFR Part 31.40(d), as appropriate, the recipient agrees to inform the EPA Project Officer as soon as problems, delays or adverse conditions become known which will materially impair the ability to meet the outputs/outcomes specified in the assistance agreement work plan. This notification shall include a statement of the action taken or contemplated, and any assistance needed to resolve the situation.

Similar provisions exist for each of the listed agreements. DEQ has an exemplary record of successfully meeting/exceeding performance requirements for all assistance agreements in all agency-wide projects/programs.

**5. Programmatic Capability**

The Idaho Department of Environmental Quality has the capacity and experience to technically manage/report on the proposed project as evidenced by a list of federally funded agreements similar in size, scope and relevance to the proposed project that DEQ has performed within the last three years. DEQ demonstrated its’ ability to meet all reporting requirements for these projects including the submission of acceptable final reports on the completed projects.

	<u>Project/Program/Agreement</u>	<u>Awarding Agency</u>	<u>Federal Amount</u>
	<i>[Budgetary Information Withheld by U.S. EPA]</i>		
1.	Clean Water Act 106, Groundwater	EPA	\$
2.	Underground Storage Tank Program	EPA	\$
3.	Superfund Multi-Sites	EPA	\$
4.	Nutrient Monitoring –Investigations Grant	EPA	\$
5.	Clean Water Act Sec 104(b) 3 (2005)	EPA	\$
6.	BLM/DEQ Cooperative Agreement	DOI	\$
7.	Defense Environmental Restoration	DOD	\$
8.	Environmental Permitting and Regulatory	DOE	\$

DEQ has an experienced management position on loan as the Director of the Idaho GEMStars program. That position will serve as project manager. DEQ has also assigned an experienced grants administrator from the fiscal division to this project to provide agency support on grants and fiscal issues.

The Department of Environmental Quality is a state department created by the Idaho Environmental Protection and Health Act (Idaho Code §39-101 et seq) to ensure clean air, water and land in the state and protect Idaho citizens from the adverse health impacts of pollution.

As a regulatory agency, DEQ enforces various state environmental regulations and administers a number of federal environmental protection laws including the Clean Air Act, the Clean Water Act, and the Resource Conservation and Recovery Act. DEQ manages a broad range of activities including:

- assessment of environmental problems;
- oversight of facilities that generate air, water, and hazardous waste pollution;
- monitoring of air and water quality;
- cleanup of contaminated sites; and
- education, outreach, and technical assistance to business, local government agencies, and interested citizens.

Within the department are seven divisions responsible for developing; administering, and enforcing environmental policies and for providing technical and administrative support. Division staff are housed in the department’s state office. On-the-ground implementation of environmental programs is conducted by six regional offices throughout the state.

DEQ carries out its responsibilities as authorized by various legislative mandates, many of which empower the state to implement and enforce federally mandated environmental programs.