

US EPA ARCHIVE DOCUMENT

2006 State Innovations Grant Program PROJECT NARRATIVE

- A. Program Title:** Indiana Environmental Stewardship Program
- B. Applicant Information:** Office of Pollution Prevention & Technical Assistance
Indiana Department of Environmental Management
402 West Washington Street, Rm. W041
Indianapolis, IN 46207

Karen Teliha, Pollution Prevention Branch Chief
317-233-5555
317-233-5627 (fax)
kteliha@idem.IN.gov

- C. Funding Requested:** The Indiana Department of Environmental Management (IDEM) is requesting \$225,000 from the U.S. Environmental Protection Agency to develop and implement a voluntary environmental leadership program designed to encourage positive environmental actions from businesses and industry. This program will be called the Indiana Environmental Stewardship Program.

D. Project Period:

The project period is effective immediately upon receiving the U.S. EPA Date of Approval (approximately August 14, 2006) through three years after that date (approximately August 14, 2009); however, developmental aspects of the Indiana Environmental Stewardship Program began in June 2005.

E. Project Workplan:

Current Situation and Need

In the past, the Indiana Department of Environmental Management's Office of Pollution Prevention & Technical Assistance (OPPTA) has offered environmental recognition programs to Indiana businesses and industry to encourage beyond compliance activities to protect the environment. There has not been a program in place for more than two years now and Indiana entities have been requesting IDEM to develop a program to challenge them to improve and to offer incentives beyond simple recognition.

The development and implementation of the Indiana Environmental Stewardship Program is being designed to meet these needs and offer regulatory incentives to those entities that have proven themselves on the cutting edge of continually improving their processes to decrease their negative impacts on the environment.

In addition, Indiana has had very few participants in the National Environmental Performance Track (NEPT) Program. IDEM is developing its new state program as a stepping stone to becoming a member in NEPT. This should lead to increased membership of Indiana entities in this successful national program.

Technical Approach

Significant improvements in environmental quality are being achieved at the state and federal level as a result of performance-based programs. Performance-based programs provide opportunities and incentives for companies to allocate resources towards continuous improvement of their environmental management system and pollution prevention program. Through these focused efforts, EPA and state

agencies are reporting increased compliance levels and reductions in material usage, energy consumption, and emission levels by program members.

The goal of the Indiana Environmental Stewardship Program is to achieve better environmental results, focusing more on outcomes (reduced emissions and higher compliance rates) than traditional measures (number of inspections and permits issued). By providing regulatory flexibility, companies create opportunities to go beyond the compliance measures established by regulations. Opportunities are also created for state and federal government, as well as the regulated community, to focus resources more strategically, producing better overall environmental results.

Eligibility criteria for the Indiana Environmental Stewardship Program consist of three areas:

- Establishment and continued performance of an Environmental Management System (EMS)
- Satisfactory compliance record
- Establishment of a Pollution Prevention Program

Some of the incentives provided to companies to encourage them to participate are:

- Recognition and promotion of program members by state agencies
- Permitting flexibility and decreased permit issuance timeframes
- Decreased recordkeeping, reporting, and monitoring frequency
- Decreased routine inspection frequency

In order to provide permitting flexibility; decreased recordkeeping, reporting, and monitoring frequency; and decreased routine inspection frequency, the Indiana Department of Environmental Management (IDEM) is writing three new rules for inclusion in the Indiana Administrative Code, respective to the Indiana Air Pollution Control Board, Indiana Water Pollution Control Board, and the Indiana Solid Waste Management Board. These three rules will afford IDEM the authority to grant regulatory benefits to Indiana Environmental Stewardship Program participants.

Objectives, Benefits, Timeline, and Deliverables

The **goals** of the Indiana Environmental Stewardship Program (ESP) include:

1. Promoting environmental management systems and continuous environmental improvement;
2. Providing opportunity through regulatory flexibility incentives for members to shift resources to continuous improvement activities; and
3. Focusing limited state resources on those facilities not proactively managing their environmental responsibilities.

There are many **benefits** to a voluntary performance based program such as ESP, including:

1. Creating a formal state mechanism that encourages entities to allocate limited resources towards programs and projects that produce positive environmental results;
2. Providing “carrots” through regulatory flexibility incentives which make the business case for joining voluntary programs like ESP and creates the time needed for in-house environmental professionals to maintain an EMS and identify, research, and implement continuous environmental improvement initiatives; and
3. Decreasing a source’s impact on the environment while increasing operational efficiency, creating more stable businesses through effective EMS implementation and commitment to continuous environmental improvement.

The following timeline provides the major tasks and milestones for creation of the Indiana Environmental Stewardship Program. The logic model provided indicates how the technical components of the work plan will achieve the goals identified for the Indiana Environmental Stewardship Program.

Data Quality Assessment, Validation and Usability

The quality of data required to demonstrate compliance with the Environmental Stewardship Program requirements will be consistent with what is currently required for an environmental management system. Both data and secondary data will be validated using protocols to be developed in accordance with the project QAPP. IDEM will provide a QAPP within 90 days of approval of the grant workplan. Because data will be dealt with on a continuum, IDEM will continually review, improve and modify the QAPP throughout the grant project as appropriate.

Data will be analyzed to ensure that unusable data is identified and removed from consideration under the project. Potential biases or influences on performance will be tracked and factored into the final results.

ESP Project Comparison to EPA Strategic Plan

EPA Strategic Plan and Goals	Objective/Sub objective identified within the 2006-2011 EPA Strategic Plan
Goal 1: Clean Air and Global Climate Change	Objective 1.1: Healthier outdoor air Strategic target: <ul style="list-style-type: none"> - Reduce toxic emissions to the air from industrial sources - Increase the use of pollution prevention to reduce toxic releases
Goal 2: Clean and Safe Water	Objective 2.2: Protect water quality Strategic target: <ul style="list-style-type: none"> - Encourage the use of pollution prevention in new water quality standards adopted in Indiana - Reduce water use by industrial sources - Reduce toxic releases to Indiana streams, rivers, etc.
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. Strategic target: <ul style="list-style-type: none"> - Reduce solid waste generation - Increase pollution prevention and recycling Objective 3.2: Cleanup and Revitalize Contaminated Land Strategic target: <ul style="list-style-type: none"> - Increase revitalization efforts by industry of brownfields

<p>Goal 4: Healthy Communities and Ecosystems</p>	<p>Objective 4.1: Reduce chemical risks at facilities Strategy target: - Encourage facilities to work closely with LEPC and community to increase risk reduction knowledge and emergency response timeliness.</p>
<p>Goal 5: Compliance and Environmental Stewardship</p>	<p>Objective 5.1: Improve compliance. Strategic target: - Provide compliance assistance to 100% of small businesses requesting assistance through the ESP program - Provide compliance incentives Objective 5.2: Improve environmental performance through pollution prevention and innovations. Strategic target: - Develop and implement a recognition program based on the National Environmental Performance Track. - Measure results of new state recognition program - Increase Indiana membership in the National Environmental Performance Track - Offer incentives that require pollution prevention integration at IDEM - Reduce releases of toxic chemicals from members of the state program.</p>

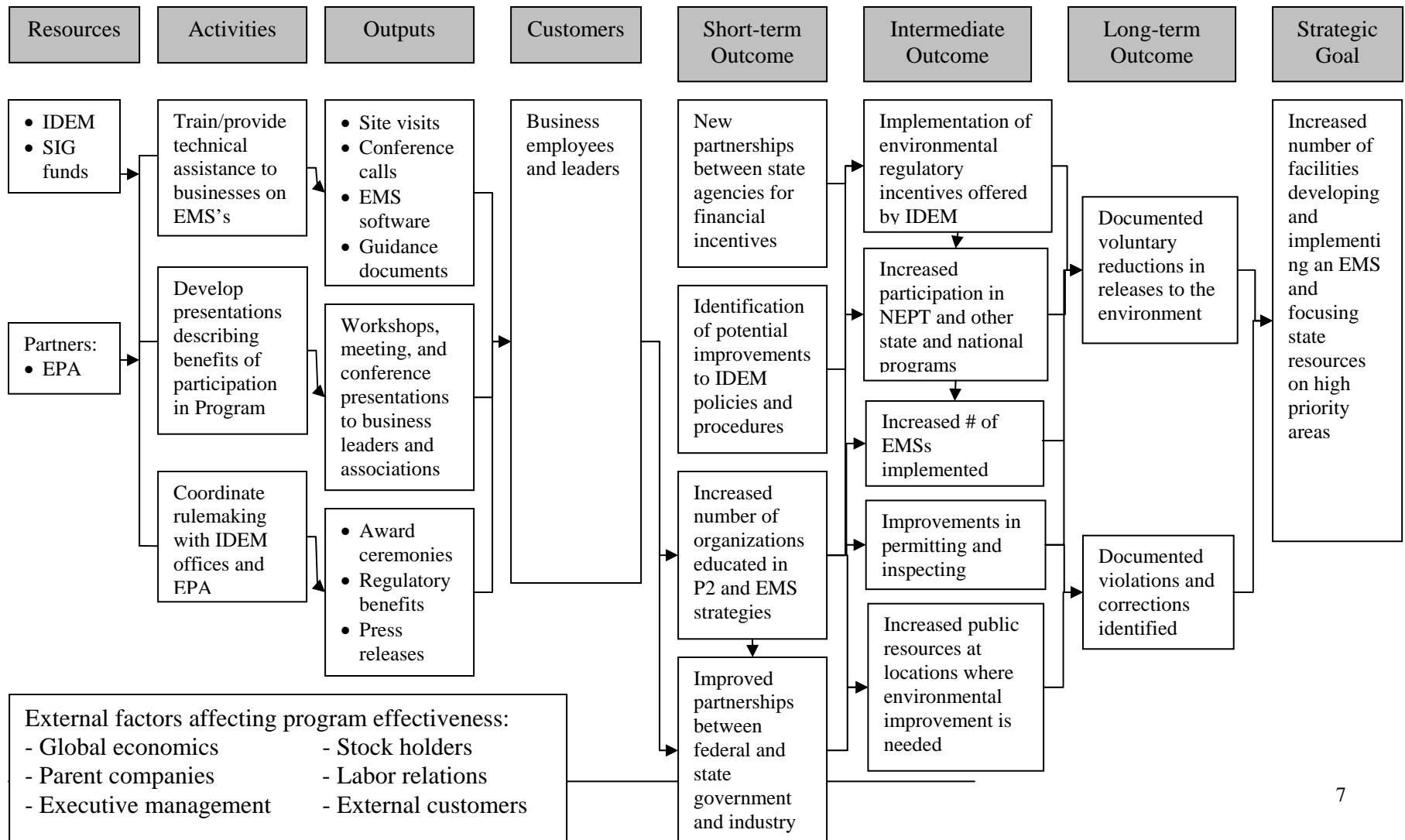
Timeline of Major Tasks and Milestones

Timeline	Major Tasks	Milestones
On-going	Coordinate with Region V EPA and Headquarters on Performance Track including application submission and review; compliance screening; dual membership, reporting and measurement; and site visits.	<u>Finalize development:</u> 2 nd Notice of Public Comment for Rulemaking to establish the program and several regulatory incentives; summary of public meeting comments and draft rule; finalize language for all incentives offered; determine application process; complete any necessary training for staff promoting the program; and finalize partnerships and responsibilities.
Spring 2006	Develop program and regulatory incentives through state rule. Train additional staff to ISO 14001 Lead Auditor level.	
Summer 2006	Develop policy to describe program procedures in detail.	
Summer 2006	Develop promotional materials. Develop web site	<u>Promotion:</u> Web site complete; application developed; brochures and booth drafted; press event held to announce program; contractor RFP issued; requests for quote issued and contract drafts begun for EMS website/software; Innovations grant received.
Summer 2006 / on-going	Establish baselines of various measures and outcomes.	
Summer / Fall 2006	Receive Innovations Grant.	<u>Implementation:</u> Responding to requests for assistance; amount and type of assistance provided; providing on-site assistance to facilities, offering EMS training programs to facilities; accepting applications to join the program; brochures printed and distributed; booth available for use; advertising the program at various conferences and workshops; EMS/P2OA Assistance contractor selected; EMS website/software contract selected and contract signed. Conduct site visits at applicants with approved EMS's and conduct site visit and EMS assessment at other applicants. <u>Implementation and Modifications:</u> Reviewing applications and announcing facilities meeting the program requirements; continue assisting potential applicants and promoting the program; speaking at meetings, workshops, and conferences to promote the program; begin offering incentives to successful applicants and tracking outcomes; modify the program as necessary; continue identifying potential incentives; quantify success stories through monetary and environmental benefits; EMS website and software approved and distributed. Continue working with EPA NCEI to identify and implement additional incentives to state and federal environmental leadership programs.
Summer / Fall 2006	Submit Quality Assurance Project Plan to EPA.	
Fall 2006 / on-going	Accept applications to the program.	
On-going	Hire a contractor to provide technical EMS expertise to assist potential applicants in EMS development and training.	
Fall 2006 / on-going	Hire contractor to develop an EMS development and tracking software for applicants. Develop or utilize EPA's EMS Implementation Manual. Develop additional EMS Sector Implementation guides with a focus on common small businesses.	
Fall 2006	Submit quarterly report to EPA on various measures including reductions achieved by measures, and successes and roadblocks of regulatory incentives offered to members.	
Winter 2007 / on-going	Determine eligibility of each applicant using their application, compliance check, review of their EMS materials, and site visit. Coordinate with NEPT.	
Winter 2007 / on-going	Notify applicants on results and issue press releases.	
Winter 2007 / on-going	Assist members of program with incentives including modifications to permits to allow them to benefit from incentives.	
Winter 2007	Submit quarterly report to EPA on various measures.	
Spring 2007	Submit quarterly report to EPA on various measures.	
Summer 2007	Submit quarterly report to EPA on various measures.	
Fall 2007	Submit quarterly report to EPA on various measures.	

Winter 2008 / on-going	Collect annual surveys and compare to baselines. Coordinate with NEPT.	
Winter 2008	Submit quarterly report to EPA on various measures.	
On-going	Continue working with IDEM program offices to limit barriers to pollution prevention opportunities to members of the program and identify or expand regulatory flexibility incentives.	
Review at least annually	In cooperation with NEPT, modify state program where needed.	
Spring 2008	Submit quarterly report to EPA on various measures.	
Summer 2008	Submit quarterly report to EPA on various measures.	
Fall 2008	Submit quarterly report to EPA on various measures.	
Winter 2009	Submit quarterly report to EPA on various measures.	
Spring 2009	Submit quarterly report to EPA on various measures.	
Summer 2009	Submit quarterly report to EPA on various measures.	
Summer / Fall 2009	Provide final report to EPA on the effectiveness of focusing on high priority entities and on what was found and accomplished related to promoting the use of EMSs and removing barriers to pollution prevention.	
		<u>Final Report:</u> Complete and submit Final Report to EPA; Innovations grant completed; determine future of program including funding and office responsible for management.

Logic Model: Indiana Environmental Performance-Based Program

Mission: To develop and implement a voluntary program to encourage Indiana businesses to implement environmental management systems that potentially will achieve environmental quality improvements and direct public resources to areas where the most environmental improvement can be made.
Evaluation question to assess: Does participation in a voluntary performance-based program increase business' environmental management and permit IDEM to focus on areas deemed as high priority?



Outcome Measures

The Indiana ESP outcomes will be linked to program funding over the course of the three-year Innovations Grant. IDEM anticipates the first year will be comprised of initial program development with some participating entities reporting environmental results. By the second year, additional results will be available as some applicants will have had time to implement an EMS and participate in the program. By the third year, IDEM will be able to predict the success of the program and will be able to make needed program improvements. A three-year final project report should accurately reflect the lessons learned and costs to implement a similar program.

Potential outcome measures include both internal and external outcomes:

External Outcomes

- Behavioral changes: Development and implementation of environmental management systems in Indiana businesses (Before and after program implementation: number of businesses participating in environmental performance-based program; number of businesses with fully implemented EMSs; number of businesses with third-party EMS certification)
- Knowledge changes: Environmental management system training and pollution prevention training to Indiana businesses (number of training attendees and outreach efforts; conduct surveys before and after trainings to assess change in knowledge)
- Environmental changes: Measured reductions on impacts to the environment – see Attachment 1 for defined measurement parameters as provided by the U.S. EPA National Environmental Performance Track program (measured reductions in pollution as a result of environmental performance-based program initiatives)
- Increased operational efficiency and profitability at organizations proactively managing their environmental responsibilities and adopting a continuous improvement philosophy for doing business

Internal Outcomes

- Behavioral changes: IDEM regulators allow approved environmental management systems to reap regulated benefits (IDEM inspectors and permit writers become more supportive of performance-based programs)
- Knowledge changes: Increase knowledge of environmental management systems and their benefits to IDEM employees (number of training attendees and internal education efforts; conduct surveys before and after trainings to assess change in knowledge)
- Environmental changes: Increase voluntary reductions as a result of regulatory incentives (number of businesses reducing emissions beyond compliance and amount reduced in order to receive regulatory incentives)

IDEM will provide EPA with various **deliverables** including:

- Quarterly reports;
- Quality Assurance Project Plan;
- Final case study report; and
- Copies of outreach materials created through this grant.

IDEM will present quarterly reports to EPA containing annual report information previously submitted to IDEM from Indiana Environmental Stewardship participants. Depending on the timeframe of the project, IDEM's quarterly reports may include:

- Regulatory incentives offered by IDEM;
- Progress on provided timeline and milestones;
- Number of entities participating in ESP; and

- Measurable outcome results over time showing environmental improvement at entities participating in ESP.

This information will be compared to baseline figures gathered by the project manager. The outcomes and deliverables will be based on the measurable objectives and will be identified in quarterly reports and a final case study report to EPA. In addition, the final report will contain a compilation of measurable objectives, successes and lessons learned, and costs to implement the project. See Section I for additional information.

Indication of Compliance with Requirements

All proposed financial and resource needs are justifiable as the Indiana Environmental Stewardship Program will assist entities with compliance requirements.

Transferability

Many states have already begun performance-based programs. In developing the Indiana program, we have researched these various programs and utilized components that fit our state program. We anticipate that once developed, the Indiana program will be a source of guidance for other states wishing to create something similar.

New ideas we hope will transfer to other states include how to encourage “compliance driven” organizations to go beyond compliance, committing to become eligible and join environmental leadership programs, and innovative regulatory incentives we plan to offer. Outreach materials created under this grant will be available to other states. IDEM will share copies of quarterly reports, the final case study report, and all outreach materials created.

Public Involvement

Public involvement has already begun. In September 2005, a first notice was issued in the Indiana Register notifying interested parties of IDEM’s intent to create a performance-based program; four public meetings were held throughout the fall of 2005; and meetings continue to be held as requested by the public. During the 2006 Indiana legislative session, legislation passed affording IDEM authority to create an environmental performance-based program that offers regulatory flexibility incentives. Currently, rule language is in the 2nd Notice of Rulemaking stage, which will provide additional opportunity for public comment and involvement.

F. Qualifications:

Stacey Martindale – Ms. Martindale is a Senior Environmental Manager in IDEM’s Office of Pollution Prevention & Technical Assistance. She is the project manager for the Indiana CLEAN Community Challenge and has participated in several environmental management training courses, including successful completion of the RAB ISO 14001 Lead Auditor Training Course. In addition, she has been instrumental in the development and successful implementation of the Indiana CLEAN Community Challenge program and is familiar with its goals and objectives. She has also been lead project manager of the 2003 State Innovations Grant awarded to IDEM for the CLEAN Community Challenge.

Karen Teliha – Ms. Teliha is the Pollution Prevention Branch Chief for IDEM’s Office of Pollution Prevention & Technical Assistance (OPPTA). As Stacey’s manager, she will be assisting in the management of this grant as well as the Pollution Prevention Demonstration Grant. Karen has also been involved in the development of the Indiana CLEAN Community Challenge program and is familiar with its goals and objectives. Karen has worked for IDEM for nine years in OPPTA under the Small Business Assistance Program and in the P2 Program.

Karen has experience managing environmental recognition programs, leading workgroups for grants and other projects, managing grants, and assisting regulated entities with compliance issues. Karen has also received environmental management system training and has been involved in the development of the Indiana Environmental Stewardship Program during the past year.

Daniel Murray – Mr. Murray is the Assistant Commissioner for IDEM’s Office of Pollution Prevention & Technical Assistant. He has been the driving force behind the creation of the Indiana Environmental Stewardship Program even prior to joining IDEM.

Previous to joining IDEM, Mr. Murray worked for six years as a Corporate Director of Environment, Health, and Safety at an Indiana manufacturing facility, and nine years as an environmental, health, and safety management consultant to a wide array of industries in the Midwest. He served for five years on the Indiana Governor’s Clean Manufacturing Technology Board and was the Vice Chair of that board prior to joining IDEM.

US EPA ARCHIVE DOCUMENT

Salary and Fringe Benefits:

Position	Office	Annual Salary	Hourly Rate	Project Hours over 3 Years	FTE for 3 Years	Total Salary	Total Fringe Benefits
Admin. Assist.	P2	\$34,807	\$17.85	292	0.05	\$5,212	\$2,240.63
Env. Sci.	P2	\$33,384	\$17.12	2925	0.50	\$50,076	\$22,075.64
Env. Mgr.	P2	\$37,544	\$19.25	2925	0.50	\$56,316	\$23,154.54
Sr. Env. Mgr.	P2	\$42,361	\$21.72	2925	0.50	\$63,542	\$24,403.83
Branch Chief	P2	\$52,516	\$26.93	585	0.10	\$15,755	\$5,407.50
Assistant Commis.	OPPTA	\$85,176	\$43.68	585	0.10	\$25,553	\$7,101.58
Media	MACS	\$45,474	\$23.32	175	0.03	\$4,081	\$1,508.36
Total						\$220,534	\$85,892

G. Total Project Cost:

The total anticipated project cost is \$531,426. The Indiana Department of Environmental Management is requesting \$225,000, or 42%, from EPA's State Innovation Grant Program and will provide \$306,426, or 58%, in matching funds via in-kind match.

H. Detailed Itemized Budget:

Budget Categories and Funding Allocations

Object Categories	EPA	IDEM
Personnel	\$0	\$220,534
Fringe Benefits	\$0	\$ 85,892
Contractual Cost	\$190,000	\$ 0
Travel	\$ 3,252	\$ 0
Equipment	\$ 0	\$ 0
Supplies	\$25,000	\$ 0
Other	\$ 6,748	\$ 0
Total Direct Costs	\$225,000	\$306,426
Total Indirect Costs	\$0	\$ 0
Total Cost	\$225,000	\$306,426

1. TRAVEL

IDEM staff may travel for training or document development purposes such as site visits or promotion of EMS documents and wizards at workshops and conferences. This may include in and out of state travel.

Per Diem:	12 days x \$26 =	\$312
Lodging:	9 nights x \$150=	\$1350
Transportation:	3 flights x \$400 =	\$1200
	3 taxis x \$30 =	\$90
	12 days parking x \$25=	\$300
	Total	\$3,252
		Total: \$3,252

2. SUPPLIES

Application Package:	\$0.50 per material x approx. 3 materials x 1000 copies each =	\$3,750
Total		\$3,750

(Including ESP application, annual report forms, application assistance materials)

ESP implementation assistance and advertising materials:	\$0.50 per material x approx. 4 materials x 10,000 copies each =	\$20,000
Total		\$20,000

(Brochures, posters, copying EMS manuals)

Office Supplies:		\$1,250	
Total		\$1,250	Total: \$25,000

(Binders, plaques, folders, CD-ROMs, paper, tabs)

3. CONTRACTUAL

Contractual agreements will be used to create an EMS development software tool, provide on-site EMS development and implementation assistance to program applicants, and provide on-site pollution prevention opportunity assessments for program members. Contractors will likely provide phone and on-site assistance to facilities that desire to join ESP, conduct workshops and training sessions, assist with web site development, and assist IDEM in creating EMS development materials or manuals. In addition, a contract may include development of a web-based EMS tracking mechanism for use by entities participating in ESP.

Contractual:		\$190,000
Total		\$190,000

Two contracts are planned for this grant as described below:

Contract 1: Provide technical EMS expertise to assist potential applicants in EMS development and training. (approximately \$140,000) IDEM's Office of Pollution Prevention & Technical Assistance has a limited number of staff with its current state funding. Current staff will focus on analyzing applications, assisting applicants with questions about the program, implementing incentives to members, conducting compliance checks, visiting applications prior to award, etc. OPPTA does not have staff time available to spend multiple days at a facility to walk them through the process of developing an EMS. Although we are creating a software and other tools to help with this process, we simply do not have the manhours to spend on site with facilities. We do believe however that there are potential contractors who can provide this service. Therefore, for small businesses with no EMS experience, our contract would visit the site and spend extensive time on site and on the phone, assisting the business as they work toward becoming a member of this program. We also anticipate including a workshop component to this contract, where businesses could attend EMS development workshops, using the EMS software developed under contract #2. This workshop approach will not work for some businesses, likely those without in-house environmental expertise. However, we believe we can provide two avenues of EMS development assistance; the workshop method assisting more entities for less overall dollars. We anticipate a contractor to charge approximately \$5000 per company for the on-site EMS development assistance. Therefore, we estimate approximately 20 -25 businesses will benefit from this contractor. During the request for proposal process, we hope to gain a better understanding of the EMS development methods and process to determine whether interested businesses should be providing matching dollars or not,

payable to the chosen contractor, leveraging this limited funding to increase the number of businesses obtaining assistance to develop their EMS and ideally, joining ESP.

Contract 2: Develop an EMS development software for applicants. (approximately \$50,000) IDEM is planning to develop a software similar to TurboTax that would walk a company through the development of an EMS document by asking questions and transferring answering into an EMS format. Video clips and factsheets may also be included as part of the software, making it user friendly and a familiar format to most any user.

4. OTHER

Other fees include booth and registration fees at conferences to advertise the Indiana Environmental Stewardship Program.

Conference Booths	20 Booths x \$250	\$4948	
Registration:	3 conferences x \$600 =	\$1800	
	Total	\$6,748	Total: \$6,748

I. Reporting Requirements:

IDEM will provide quarterly reports to the U.S. EPA and will submit a detailed follow-up case study report at the conclusion of the grant period.

Quarterly reports will contain items such as the number of Indiana entities participating in the program, reduction achievements, environmental improvements, and numerous other items that participating entities must report to IDEM.

Attachment 1: Measurement Parameters

Category	Indicator	Units
Material Procurement	Recycled Content (Total or specific)	Pounds, tons
	Hazardous/toxic components (Total or specific)	Pounds, tons
Material Use	Materials used (Total or specific)	Pounds, tons
	Hazardous materials used (Total or specific)	Pounds, tons
	Ozone depleting substances used (Total or specific)	CFC-11 equivalent tons, CFC-11 equivalent pounds
	Total packaging materials used	Pounds, tons
Water Use	Total water used	Gallons
Energy Use	Total (non-transportation) energy use by fuel type	kWh/MWh or Btu/MMBtu
Land and Habitat	Land and habitat conservation	Square feet, acres
Air Emissions	Total greenhouse gasses (GHG)	MTCO ₂ E
	VOCs (Total or specific)	Pounds, tons
	NO _x	Pounds, tons
	SO _x	Pounds, tons
	PM _{2.5}	Pounds, tons
	PM ₁₀	Pounds, tons

	CO	Pounds, tons
	Air toxics (Total or specific)	Pounds, tons
	Odor	European Odor Units
	Radiation	Curies, Becquerels
	Dust	Pounds, tons
Discharges to Water	COD	Pounds, tons
	BOD	Pounds, tons
	Toxics (Total or specific)	Pounds, tons
	Total suspended solids	Pounds, tons
	Nutrients (Total or specific)	Pounds, tons of Total N or P
	Sediment from runoff	Pounds, tons
	Pathogens (Total or specific)	MPN/ml, CFU/ml
Waste	Non-hazardous waste generation, broken down by management method (Total or specific)	Pounds, tons
	Hazardous waste generation, broken down by management method (Total or specific)	Pounds, tons
Noise	Noise	dBA
Vibration	Vibration	Inches per second
Products	Expected lifetime energy use (Total or specific)	kWh/MWh or Btu/MMBtu
	Expected lifetime water use (Total or specific)	Gallons
	Expected lifetime waste (to air, water, land) from product use (Total or specific)	Pounds, tons
	Waste to air, water, land from disposal or recovery (Total or specific)	Pounds, tons