U.S. EPA STATE INNOVATION GRANT PROGRAM

South Carolina Department of Health and Environmental Control
Environmental Quality Control
PROJECT WORK PLAN

Project Title: Incorporating Environmental Management Systems in Permit Decisions

Applicant: South Carolina Department of Health and Environmental Control
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Environmental Quality Control Administration
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Funding Requested: $107,161

Project Period: From date of official award ~ January 1, 2005 through September 30, 2006

Project Narrative/Work Plan:

A. Project Background and Problem Statement.

The South Carolina Department of Health and Environmental Control (DHEC) is involved in two programs designed to recognize regulated facilities with environmental management systems (EMSs). The first is the South Carolina Environmental Excellence program, the state's voluntary environmental leadership program. Created over six years ago with active participation by DHEC, one of the membership criteria for acceptance into the program is that the facility has an EMS. The program currently has 23 members of which 15 have active EMSs. Three of the participants are also members of the EPA National Environmental Performance Track program. The second program is the South Carolina Environmental Innovations Pilot program. Modeled after the Wisconsin Environmental Cooperation Pilot program, it is designed to test innovative environmental approaches with up to 10 participating facilities through the use of enforceable cooperative agreements. A requirement for participation in the pilot is that the facility either has a current EMS or commits to develop one through the cooperative agreement.

While DHEC recognizes the value of an EMS in these voluntary programs, it has little experience with incorporating EMSs into the regulatory framework. DHEC recently required the development of an EMS as part of a settlement in an administrative appeal of a permit by a wastewater treatment facility. An EPA Consent Decree with an electric utility in South Carolina also required the development of an

EMS. To date, however, DHEC has not considered ways to incorporate EMSs into permit decisions. With shrinking state budgets and increased demands for environmental protection, more innovative approaches to ensure compliance and greater than compliance environmental performance by regulated facilities are needed. EMSs offer an opportunity to streamline, integrate, and potentially achieve better environmental results.

B. Project Goals and Expected Environmental Outcomes.

The project is designed to explore the relationship between facility EMSs and permitting. This will be accomplished by a study of selected facilities with EMSs and one or more permits issued by DHEC. Two of the selected facilities will have RCRA permits so that a more in-depth study of the relationship between RCRA permits and EMSs can be undertaken. The goals of the project are to:

- Improve the overall performance of a facility;
- Explore ways permit requirements can be integrated and streamlined based on an EMS;
- Determine how an EMS can help to ensure consistency in the development, issuance, inspection, interpretation, and potential enforcement of a permit both from a single media and cross-media perspective; and
- Evaluate the potential benefits of incorporating EMSs as an incentive for permitting options.

Ultimately, the project will provide recommendations on the integration of EMSs into permit decisions. Study results will be evaluated in the context of current permitting processes. If appropriate, actual permit modifications to allow the testing of study results will be available through the Environmental Innovations Pilot program

While the actual facilities have not yet been selected to participate in the project, it is expected that they will have one or more of the following permits issued by the agency: air (Title V, state operating, or conditional major) permit; NPDES or a pretreatment permit; stormwater (individual or general) permit; and a hazardous waste treatment, storage or disposal permit. Expected environmental outcomes will be linked to opportunities for improved environmental performance as identified in the review of a facility's EMS and permit requirements. Through the identification of opportunities like process changes, streamlined administrative requirements, materials substitution, pollution prevention activities, greater than compliance results may be identified. These in turn can translate into less air emissions or wastewater discharges, the generation of less waste for treatment or disposal, and the freeing up of manpower and/or administrative costs to apply to other environmental improvement projects such as energy conservation and habitat preservation. Through DHEC staff EMS training, permit writers may identify better or more efficient permit requirements that in turn allow the facility to do more environmental improvements beyond the regulatory requirements.

C. Links to EPA and DHEC Strategic Goals.

The project is consistent with EPA's *2003-2008 Strategic Plan*, *Goal 5*, "Compliance and Environmental Stewardship," specifically, *Objective 5.2* "Improve Environmental Performance through Pollution Prevention and Innovation," and *Sub-objective 5.2.4*, "Environmental Policy Innovation," wherein EPA will "through 2008, achieve measurably improved environmental and economic outcomes by testing, evaluating and applying alternative approaches in environmental

protection is states, companies, and communities" (Strategic Plan at 114-115). The strategic targets for this Sub-objective include state projects conducted under the State Innovation Grant program to collectively achieve an environmental improvement of 15 percent in water and energy use, waste generation or disposal, releases of contaminants, or an increase in 15 percent in cost effectiveness and efficiency while achieving equal or improved environmental results.

The project's focus on RCRA-permitted facilities also furthers EPA's Strategic Plan *Goal 3*, "Land Preservation and Restoration," and *Objective 3.1* to "Preserve Land" by reducing adverse impacts to land by reducing waste generation, increasing recycling, and ensuring proper management of waste…in ways that prevent releases." By identifying environmental improvement opportunities through EMSs at RCRA facilities, the project supports *Sub-objective 3.1.1* by helping to reduce materials use through product and process redesign, and increase materials and energy recovery from wastes otherwise requiring disposal (Strategic Plan at 58-59).

This project reflects the goals of the U.S. EPA *Strategy for Determining the Role of Environmental Management Systems in Regulatory Programs* issued April 12, 2004 by working with EPA to determine "whether there are potential benefits to be gained from incorporating EMS options into permitting and regulatory structures." It is consistent with the goals of the Strategy by exploring linkages between EMSs and permitting, and examining potential opportunities to, among others, improve environmental results, improve regulatory compliance, and promote pollution prevention (EMS Strategy at 2).

The project is consistent with DHEC's own *2000-2005 Strategic Plan*, specifically *Long Term Goal 5*, to "Protect, Continually Improve and Restore the Environment" (DHEC Plan at 20). Strategic goals within Goal 5 include improvement in the number of permitted facilities in compliance, reductions in the pollutants released to the air, surface waters and groundwater, and reductions in hazardous waste and solid waste generation and disposal (DHEC Plan at 22). Goal 5 also includes the restoration of impaired natural resources, including tracking and reporting the amount (acres) of contaminated land remediated.

D. Project Work Plan.

The project will be conducted over a two-year period beginning from the date of the official grant award (~ October 2004) through September 2006. A project team comprised of permitting, compliance and enforcement staff from the Bureaus of Air Quality, Water, and Land and Waste Management will be formed. The team will serve in an advisory capacity as the technical experts on permitting and related issues. The project director will supervise the project work, ensuring that project activities are completed, milestones are met, and other grant requirements are fulfilled. The project manager will be responsible for the day-to-day project activities. A RCRA staff person from the Bureau of Land and Waste Management will assist with the RCRA portion of the project. Services of an expert on EMSs will be contracted with to provide EMS training and to assist with project activities, including data analysis and reporting.

The project team will solicit the participation of up to four facilities that are members of either the South Carolina Environmental Excellence program or the EPA National Environmental Performance Track program. Members of the Environmental Excellence program will be meeting on September 29,

2004 at the South Carolina Environmental Symposium, and time has been allotted on the agenda to discuss the project. Once the project team has determined the best candidates to participate in the project, the facilities will be individually contacted. Two of the facilities will have RCRA permits to fulfill the RCRA component of the project. Every effort will be made to ensure that at least one facility has an ISO-certified EMS. If there are no facilities from either the Environmental Excellence or Performance Track programs that wish to participate, the project team will seek recommendations from the respective permit programs, and facilities will be contacted based on these recommendations.

Quarterly reports will be prepared for EPA detailing completion of project milestones, expenditures of funds, important outcomes, and unexpected problems or issues. A final project report will be provided both to EPA Region 4, EPA and to NCEI. The final report will include an assessment of the overall success of the project and address issues and lessons learned. Project reports and other information will be maintained on a project web page on the DHEC web site. Abstracts and papers, power point presentations and other materials will be prepared for presentation at appropriate forums. Below is the project schedule followed by a more detailed description of the activities listed in the schedule.

1. Project Schedule

Time Frame*	Activity	Commitment
Nov.'04 – Jan.'05	1. Form project team and hold organizational meeting.	Cross-media staff from major program areas; RCRA staff person to assist project; Project manager & project director named
Nov.'04 – Jan.'05	2. Project goals and objectives validated; Refine project performance measures and performance measurement plan with project team, identify stakeholders and methods of public communication on project progress	Performance measures consistent with project goals; Major stakeholders contacted; Web page created
Nov.'04 – Apr.'05	3. Solicit and award contract for EMS project consultant	Contract awarded
Feb.– Apr.'05	4. Recruit facilities to participate in project Revise QAPP	Facility commitments of up to four to participate in project, two of which have RCRA permits; Agreements signed; QAPP revised
Aug.'05	5. Conduct EMS staff training with participating facilities	Pre and post-test evaluations to measure staff's Awareness/understanding of EMSs
Apr.'05 – Mar.'06	6. Conduct study of facility permits and EMSs	Baseline established; EMS/Permits analyzed List of potential streamline permit requirements identified; List of potential incentives in permits identified
Apr.'06 – Jul.'06	7. Prepare report documenting findings of EMS/permit study	Environmental performance improvements identified; Administrative/other cost savings identified
Aug.'06	8. Follow-up survey of EMS training staff participants to determine use/knowledge of EMSs	Increased awareness/understanding of EMSs; use of EMSs in regulatory decisions by staff
Sep. – Oct.'06	9. Finish final report documenting findings of EMS/permit study	Recommendations on integration of EMSs into permitting decisions; Recommendations for pilot testing recommendations through Environmental Innovations Pilot program

2. Project Activities

Activities 1 & 2. Assemble cross-media project team and refine project performance plans. (November 2004-January 2005)

Environmental Quality Control is comprised of three major media programs (Water, Air Quality and Land and Waste Management) with permitting, compliance and enforcement divisions within each. A cross-media team of permitting, compliance and enforcement staff will be assembled to serve as the project team. Staff on the project team will serve as an in-kind resource to the project. Staff representatives on the team may depend on the types of permits held by the participating facilities.

The project team will serve as advisors to the project director and project manager, and as the panel of experts on permitting and related issues. Activities that will involve the project team include:

- Review and validate project goals and objectives;
- Review and validate performance measures;
- Review and select facility participants for the project;
- Revise the Quality Assurance Project Plan (QAPP) as appropriate (e.g. after facilities are selected);
- Identify major stakeholders
- Participate in EMS training;
- Assist in the review of facility permits and EMSs;
- Develop recommendations on ways that permitting decisions can be impacted positively (or negatively) by a facility EMS.

Public involvement will be achieved in several ways. The South Carolina Environmental Excellence program has an advisory committee comprised of representatives from environmental organizations, the regulated community, academia, and the general public. The advisory committee will serve as an outlet for disseminating information to the major stakeholder groups represented on the Committee. (e.g. the SC Chapters of the Sierra Club and the Wildlife Federation as well as the League of Women Voters). The participating facilities will also work through their respective community advisory groups to provide information and updates on the project. Presentations will be made at regularly scheduled meetings of the South Carolina Chamber of Commerce's Environmental Technical Committee and the South Carolina Manufacturer's Alliance. Members of the Environmental Excellence program meet on a semi-annual basis, and they will also be updated on the project's progress. The project web page will be created and linked from DHEC's home page, and will include up-to-date information about the project.

Activity 3. Solicit and award contract for EMS project consultant. (November 2004-April 2005)

Because DHEC's in-house capabilities are limited in the area of EMSs, project funds (contractual services) will be used to contract with a project consultant. In accordance with agency procurement procedures, a Request for Proposals will be issued on a competitive award basis. Services of the consultant will include:

- Developing and providing EMS training for DHEC staff and participating facilities;
- Assisting with EMS, permitting and data analysis for the facility permits and EMS;
- Preparing reports, analysis, and other information as requested by the project team;

- Serving as an expert adviser to the project team on EMS questions.

Qualifications of the EMS consultant will include extensive experience in conducting EMS training, active certification as an ISO 14001 auditor, experience in conducting gap analyses and preparing facility EMSs, research credentials involving lectures, peer reviewed papers, and national presentations on EMSs, and experience working with DHEC, other state agencies, and federal facilities on EMSs.

Activity 4. Screen and select facilities to participate in project and revise QAPP. (February-April 2005)

DHEC has already obtained a list of permits held by Environmental Excellence and Performance Track program members as well as the type of EMSs under which these facilities operate. They will be reviewed by the project team along with a compliance screen to determine the best candidates for participation in the project. The facilities will then be contacted and up to four facilities will be asked to participate. Two of the four will have RCRA permits. Facility selection will take into consideration the following factors:

- Length of membership in either Environmental Excellence or Performance Track programs;
- Type of EMS (i.e. at least one ISO-certified and one non-ISO certified facility);
- Type of permit(s) held by the facility;
- Compliance status;
- Willingness to assist with EMS training for DHEC staff;

Once the facilities are selected, a meeting of facility representatives and the project team will be held. As part of the EMS training, it is anticipated that a walk-through of the facilities will be conducted. Written agreements with the facilities will be developed to outline the type of information, including provisions for confidentiality of proprietary information, that may be shared and the interaction that is anticipated by the facility's involvement in the project. In the event that no facilities from the environmental leadership programs agree to participate, recommendations will be solicited from permit program staff, and individual facilities will be contacted.

Once the facilities are identified and agreements are signed, the Project Team will review and revise the initial QAPP to reflect data quality control objectives and other details that are more specifically applicable to the participating facilities. The revised QAPP will be submitted to EPA.

Activity 5. Conduct EMS staff training with participating facilities. (August 2005)

Training for DHEC staff to improve their understanding of EMSs will be conducted in conjunction with the participating facilities. The training will be developed and provided by the EMS project consultant. It will include, but not be limited to, a general overview of EMSs and the elements of an effective EMS. The training will include case studies and information on the EMSs used by the facilities participating in the project. Facility personnel will work with the project consultant to develop this portion of the training. The training will be open to all permitting, compliance and enforcement staff.

Pre- and post-test evaluations will be utilized to measure increased understanding/awareness of EMS as a result of the training.

Activity 6. Conduct study of facility permits and EMSs. (April 2005- March 2006)
During this phase of the project, the project team will analyze existing permits, environmental impacts and facility EMSs to establish facility baselines and to determine areas where incorporation of EMS components may positively influence overall environmental performance. To do this, the facility will provide information that includes:

- Written environmental policies and corporate commitments to superior environmental performance
- The facility EMS, including, methods and procedures that take into account environmental aspects, legal requirements, objectives, targets, employee training, compliance monitoring and measurement, reporting and record keeping, corrective action plan and procedures, and other documentation related to assessing operations for purposes of preventing or controlling releases, ensuring environmental protection, and maintaining compliance with statutory and regulatory requirements;
- Information on public involvement and community outreach programs for informing the community of the facility's environmental aspects and performance;
- Reports of the most recently performed internal and external third-party audits of the facility.

DHEC will utilize existing data of the agency including monitoring, sampling, reporting, compliance certifications, inspection reports, and other information on the participating facilities as required by their permits. Facility data is maintained on Environmental Quality Control's "Environmental Facility Information System" (EFIS). Established in 1997, EFIS is an enterprise-wide, client-server information system that integrates information on facilities, permits, violations, enforcement actions, and compliance activities for all media programs. The system architecture is based on the Oracle 8.1.6 database and includes web components for electronic forms submittal and GIS interface.

If additional or new data is collected during the course of the project, procedures established in the 2001 Edition of Environmental Quality Control's *Environmental Investigations and Standard Operating Procedures and Quality Assurance Manual* will be followed. The agency also has a *Quality Assurance Management Plan* that describes how programs within DHEC will plan, implement, and assess the quality of environmental work to be performed within the agency. It is the "blueprint" that defines DHEC's Quality Assurance (QA) policies and procedures, the criteria and areas of application, and the various QA-related roles, responsibilities, and authorities for personnel.

Data collection and quality control procedures specific to this project are more fully outlined in the accompanying Quality Assurance Project Plan. The Plan will be refined once the facilities are selected to participate.

Activity 7. Prepare report documenting findings of EMS/permit study. (April 2006-July 2006)
Upon completion of the analysis of facility permits and EMSs, a report documenting the study's findings will be prepared. It is expected that the report will focus on the relationship between EMSs and permitting in the following particulars:

- Integrating EMS requirements into permits;
- Improving consistency in how permits are written, interpreted, and enforced;
- Streamlining administrative and permit requirements based on the EMS;

- Improving overall environmental performance of facility;
- Identifying "beyond compliance" opportunities through pollution prevention, energy and/or natural resource conservation;
- Identifying potential waste reductions;
- Demonstrating potential waste avoidance of unauthorized releases, spill prevention, risk management and pollution prevention;
- Demonstrating administrative efficiencies and/or cost savings.

The project's performance measures will focus on improved environmental performance based upon the opportunities identified by integrating EMSs into permitting decisions. To that end, the project will contribute data in the following categories:

- Environmental performance in terms of waste reduced or waste avoidance,
  --Solid waste in tons per year;
  --Hazardous waste in pounds per year;
  --Water use in gallons per year;
  --Energy use in kWh per year; and
  --Air pollutants in tons per year .
- Environmental condition indicators (improvements in environmental quality in relation to the facility and its discharges);
- Environmental compliance indicators (presence or absence of warning letters, notices of violation, enforcement referrals, enforcement conferences, and formal enforcement actions resulting in issuance of an order);
- Pollution prevention and waste minimization opportunities;
- Enhanced community involvement (extent and types of activities undertaken to involve the community);
- Quality and quantity of environmental information produced; and
- Administrative cost savings and resource efficiencies realized (both on the part of the facility and by DHEC),
  --staff time devoted to inspection, monitoring, file reviews, and compliance-related activity
  --costs as measured by man hours and reallocation of staff time.

Activity 8. Follow-up survey of staff trained to determine use/knowledge of EMSs. (August 2006)
Approximately a year after the staff training is conducted, a follow-up survey will be administered to determine overall improvement in staff's understanding and knowledge of EMSs, and to what extent EMSs have been implemented (or considered in decisions) within the regulatory programs. The follow-up survey will specifically focus on the level of improved awareness/understanding of the permitting staff on how EMSs can impact permit requirements.

Activity 9. Finish final report with recommendations based on EMS/permit study. (September-October 2006)
The study results will help DHEC to evaluate how EMSs relate to permits and the requirements contained therein. Recommendations on the integration of EMSs into permitting decisions will include types of incentives that may encourage more facilities to adopt EMSs. Regulatory incentives have been identified conceptually through ongoing discussions with facilities that are members of the South Carolina Environmental Excellence program. Member representatives meet on a semi-annual basis with

Environmental Quality Control management and staff to discuss issues of concern to the regulated community. Through the Environmental Excellence Council meetings, regulatory incentives that have been identified include:

- Allowing minor modifications to permits through a streamlined administrative process;
- Reduced inspection schedules;
- Streamlined reporting and monitoring requirements or changes in the frequency of reporting;
- Alternative enforcement approaches for self-disclosed violations.

Incentives that are identified through the project may require statutory or regulatory changes in order to incorporate them into the permitting process. However, a mechanism that is available for the express purpose of demonstrating "alternative environmental approaches" exists through the South Carolina Environmental Innovations Pilot program. Authorized by the South Carolina General Assembly in 2002, DHEC may enter into up to 10 cooperative agreements with participating facilities. Variances from existing statutory or regulatory requirements or existing permit conditions may be granted for the facility the alternative approaches meet at least one of three criteria: (1) achieves emissions reductions or reductions in discharges of waste that exceed applicable statutory or regulatory requirements; (2) provides for alternative monitoring, testing, record keeping, notification, or reporting requirements that reduce the administrative burden to the department or the facility and provides information needed to ensure compliance with the cooperative agreements; or (3) achieves natural resource conservation or reductions in the use of natural resources or energy consumption. DHEC is authorized to enter into agreements until May of 2007. Agreements entered into are effective for up to five years with a possibility of renewal for one additional five-year period. This pilot program will allow DHEC to incorporate incentives or other changes that are identified through the project but may not otherwise be allowed under existing law or regulation. This would provide a mechanism to demonstrate the efficacy of the changes for the participating facility and to implement project recommendations beyond the life of the project. If successful, it would then allow DHEC to seek permanent statutory or regulatory changes to incorporate recommendations into permitting or other activities for a broader universe of regulated facilities with EMSs.

3. Performance Measurements

DHEC will use this project as an effort to determine if and how incorporating EMSs into permitting decisions (a) increases overall environmental performance leading to improved environmental results, (b) results in administrative cost savings or greater efficiencies in the allocation of resources for regulatory oversight; (c) achieves greater consistency in the development, issuance, inspection, compliance, and enforcement of the permit, and/or (d) provides greater public benefit resulting through better quality and of information and reporting of facility performance. The following Logic Model better identifies and describes the performance measures in the context of the project's activities and resources.

INPUTS:
* DHEC staff
*EPA grant funds
*EPA OPEI, OSW, Region 4 staff
*MSWG
*ECOS
*Other states

ACTIVITIES:
1.Training
*Conduct EMS training for DHEC staff & facilities
*Conduct pre/post-test evaluations
*Conduct 1-yr follow-up staff survey
2. Program Development
*Form project team
*Hire consultant
*Recruit facilities to participate & obtain agreements
*Conduct study of facility permits and EMSs
3. Reporting
*Prepare EPA quarterly reports and final report
4. Outreach & Marketing
*Create Web Page
*Prepare papers & presentations documenting project results
*Attend state and federal conferences

OUTPUTS:
1. Training
*# of DHEC staff trained in EMSs
*Test results documenting DHEC staff understanding of EMSs
2. Program Development
*# facilities participating in project
*Report documenting study findings
*List of incentives in permits
*List of potential streamline permit requirements
*Administrative or cost savings I.D.
*Recommendations on integration of EMSs into permit decisions
3. Reporting
*Quarterly progress reports and final report
4. Outreach & Marketing
*Project web page
*PPT presentations of EMS/permit study results
*Abstracts and papers prepared

CUSTOMERS REACHED:
*Major stakeholders (environmental, general public, regulated community)
*SCEEP Advisory Committee
*Facility CAGs
*EPA – OPEI,. OSW, R.4
*ECOS/States

SHORT-TERM OUTCOMES:
*****DHEC staff knowledge of EMS improved
*Staff understanding of how EMS can impact permit requirements improved
*Test results documenting staff understanding of EMS
*Knowledge of relationship between EMSS and permitting programs is increased.

INTERMEDIATE OUTCOMES:
*Participating facilities with increased compliance, P2, and beyond compliance opportunities identified
*Facilities demonstrate waste reductions or waste avoidance of unauthorized releases, spill prevention, risk management and P2
*Incentives in permits identified
*Streamlined administrative & permit requirements identified
*Consistency in how permits are written, interpreted, enforced improved
*Administrative savings and efficiencies identified
*Feasibility of permit changes based on study evaluated

LONG-TERMS OUTCOMES:
*Improvements in overall environmental performance
*Facilities show waste reduction or avoidance of unauthorized releases etc. based on EMS
*Cost savings - administrative or resource savings to facility and DHEC
*Facilities obtain beyond compliance measures identified in their EMSs
*Integration of EMS into permit demonstrated
*Streamlined administrative & permit conditions provided in permits demonstrated
*Facility make use of incentives provided in permits
*Body of knowledge regarding relationship between EMSs and permitting program is increased
*Project advances Innovation Strategy recommendation to "support environmental policy as a way to ensure compliance & promote beyond compliance performance

LINKS TO EPA STRATEGIC PLAN 2003-2008:

GOAL 5. Compliance and Environmental Stewardship

Objective 5.1. Improve Compliance
Sub-objective 5.1.1.
*Prevent noncompliance or reduce environmental risks through compliance assistance by achieving an increase in regulated entities that improve their understanding of environmental requirements; improve their environmental management practices; reduce, treat, or eliminate pollution

Objective 5.2 Improve Environmental Performance through Pollution Prevention and Innovation
Sub-objective
5.2.4. Environmental Policy Innovation
*Demonstrate alternative regulatory approaches that will achieve environmental improvements in water use, energy use, waste generation or disposal, air releases, water discharges, or habitat quality
*Demonstrate improved cost effectiveness or administrative efficiency while achieving equal or greater environmental results

GOAL 3. Land Preservation and Restoration

Objective 3.1 to "Preserve Land"
*Reducing adverse impacts to land by reducing waste generation, increasing recycling, and ensuring proper management of waste…in ways that prevent releases."
Sub-objective 3.1.1
*Help to reduce materials use through product and process redesign, and increase materials and energy recovery from wastes otherwise requiring disposal

D. Project Organization and DHEC Staff Qualifications.

Environmental Quality Control (EQC) within DHEC is responsible for administering and enforcing the state's environmental statutes and regulations. EQC is comprised of four bureaus: District and Laboratory Services; Air Quality; Land and Waste Management; and Water. EQC Administration provides core support services to the bureaus and to the 12 district offices around the state (see attached organizational chart).

Project funds will be used to support the project manager, a staff person from the RCRA program, and a project consultant (see "Activity 3" for a description of the project consultant's role). Staff qualifications, project responsibilities, and funding support, are more fully described below.

1. Project Director.

Claire H. Prince will serve as project director. Ms. Prince is the Director of Enforcement and Compliance Assistance within EQC Administration. An attorney with a Master of Studies in Environmental Law, Ms. Prince has been with the agency for almost four years. Her responsibilities include coordinating enforcement activities for all the media programs, and strengthening EQC's compliance assistance activities. She also supervises EQC's pollution prevention unit, the Center for Waste Minimization, and EQC's Enforcement Liaison. Prior to joining the agency, Ms. Prince directed the Center for Environmental Policy at the University of South Carolina where she spearheaded the creation of the South Carolina Environmental Excellence program. She also managed state and federal grant-funded environmental research projects the included a statewide pollution prevention technical assistance program and a pollution prevention partnership for the state's military installations. Prior to her work with the University, Ms. Prince served as the director of research for two South Carolina Senate committees. Ms. Prince will devote 10 percent of her time as an in-kind contribution to the project. Her responsibilities will include overall project coordination, supervision of the project manager and project consultant, and coordination with the project team. She will ensure that all activities, milestones, and project deliverables are met.

2. Project Manager.

Ms. Christine Steagall will serve as project manager. Ms. Steagall will begin work with DHEC on October 1, 2004 as an Environmental Health Manager within the Center for Waste Minimization. While new to the agency, she has extensive experience working with DHEC. She has worked for the past five years as the program coordinator for the South Carolina Environmental Excellence program at the University of South Carolina. Additionally, she has coordinated an EPA Region 4 Pollution Prevention Partnership for the military bases within the region. As part of this effort, she administered over one million dollars in congressional appropriations for grant-funded university partnerships for the region's installations. A major research effort funded through this partnership was an EMS project that involved training of base staff on EMSs and developing EMSs at several installations. Ms. Steagall also has extensive work experience in the RCRA program. For nine years, she served as the hazardous waste manager for Shaw Air Force Base, and the base's pollution prevention coordinator. In that capacity, she was responsible for all of the base's RCRA-permitted activities. She will devote 40 percent of her time as project manager with major responsibilities to include:

- Coordinating day-to-day project activities;
- Assisting in the collection and analysis of data;
- Coordinating DHEC staff EMS training in partnership with participating facilities;

- Working with participating facilities to review and analyze permits and EMSs;
- Providing public information and stakeholder involvement;
- Communicating with EPA and other partners on project progress and findings;
- Administering project budget, staff resources, and other related activities.

3. RCRA staff support.

To support the RCRA component of the study, 10-15 percent of a staff person from the RCRA permit program within the Bureau of Land and Waste Management will be funded. The staff person will be responsible for providing assistance with specific issues involving RCRA-permitted facilities with EMSs. The staff person will be supported by the project manager as well as by the services of the project consultant.

Please see attached resumes for the project director and project manager.

Project Director and Primary Contact:

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Environmental Quality Control
SC Department of Health and Environmental Control
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E. Project Budget.

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2-YEAR BUDGET
SCDHEC SIG Project
EMS in Permitting

BUDGET CATEGORY	FEDERAL-OPEI	FEDERAL-OSW	TOTAL-FEDERAL
PERSONNEL			
Project Manager (40% FTE)	22,000	10,000	32,000
Project Director (10% FTE)			
RCRA Program Manager (10% FTE)		11,156	11,156
FRINGE (32%)	7,040	6,770	13,810
TRAVEL	1,000	700	1,700
SUPPLIES	500		500
CONTRACTUAL SERVICES	20,000	15,000	35,000
AGENCY INDIRECT (13.8%)	3,036	2,920	5,956
EQC DIVISIONAL RATE (16.31%)	3,588	3,451	7,039
TOTALS	57,164	49,997	107,161