# *Best Practices*

AND PROGRAM IMPROVEMENTS EXPECTED TO RESULT FROM THE STATE REVIEW FRAMEWORK

**** FIRST EDITION****

THIS FIRST EDITION IS BASED ON SRF REPORTS FINALIZED AS OF MAY 2007

OFFICE OF COMPLIANCE, OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE
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# Best Practices and Program Improvements Expected to Result from SRF

**** First Edition****

## I. Introduction and Purpose of Report

### A. Background on SRF

EPA's Office of Enforcement and Compliance Assurance, the ten EPA Regions, the Environmental Council of the States (ECOS) Compliance Committee and state representatives from each of the ten regions worked together to develop a tool to assess state compliance and enforcement programs. The tool is known as the "State Review Framework" (SRF). Under the SRF, a team of EPA representatives visits each state and evaluates their compliance and enforcement program against 12 elements identified below; these elements take into account data in the national data systems of record and longstanding EPA policies and guidance. The reviewers host discussions with the states and examine a sub-set of the state's files, including any state data highlighted during the review. The focus is on three federally-delegated programs: the Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES), the Clean Air Act (CAA) Stationary Source program, and the Resource Conservation and Recovery Act (RCRA) Subtitle C program. EPA provides feedback to each state in the form of continuing discussions and a final SRF report, which outlines recommendations for improvement, as appropriate, based on a review of the 12 elements. As of May 2007, EPA had finalized SRF reports for 25 states. One of the goals and anticipated benefits of the SRF reviews is to identify and share potential best practices.

### B. Purpose of Report

This report highlights examples of potential best practices based primarily on information included in the final SRF reports and is a resource for regions and states. It is referred to as the "First Edition" because it will be expanded after remaining reviews are conducted and SRF reports are finalized for the other states. It's important for reviewers to identify potential best practices in future SRF reports.

For purposes of this report, best practices are defined as:

1) activities or approaches which significantly improve a state's ability to monitor and/or ensure compliance;
2) state implementation of national guidance which exceeds the national standards; and/or
3) concerted efforts on the part of an EPA Region to respond to a state need in such a way that it assists other states as well, or has the potential to do so, if replicated.

All best practices should, at a minimum, meet federal standards and be able to be adapted to meet the needs of other states and/or regions.

## C. SRF Review Elements

Under SRF, EPA and the states evaluate the states' compliance and enforcement programs against the following 12 elements:

1. The degree to which a state program has completed the universe of planned inspections (addressing core requirements and Federal, state and regional priorities);
2. The degree to which inspection reports and compliance reviews document inspection findings, including accurate descriptions of what was observed to sufficiently identify the violation(s);
3. The degree to which inspection reports are completed in a timely manner, including timely identification of violations;
4. The degree to which significant violations (e.g. significant noncompliance and high priority violations) and supporting information are accurately identified and reported to EPA's national databases in a timely manner;
5. The degree to which state enforcement actions include required corrective or complying actions (i.e. injunctive relief) that will return facilities to compliance in a specific time frame;
6. The degree to which a state takes timely and appropriate enforcement actions, in accordance with policy relating to specific media;
7. The degree to which a state includes both gravity and economic benefit calculations for all penalties, appropriately using the BEN model or similar state model (where in use and consistent with national policy);
8. The degree to which penalties in final enforcement actions collect appropriate economic benefit and gravity in accordance with applicable penalty procedures;
9. The degree to which enforcement commitments in the PPA/PPG/categorical grants (i.e. written agreements to deliver a product/project at a specified time), if they exist, are met and any products or projects are completed;
10. The degree to which the minimum data requirements are timely;
11. The degree to which the minimum data requirements are accurate; and
12. The degree to which the minimum data requirements are complete, unless otherwise negotiated by the region and state or prescribed by a national initiative.

States may also designate an optional thirteenth element (pending negotiation with their EPA region) to ensure that the review takes measure of the full range of program activities and results.

The 12 elements above give a sense of the information discussed during the reviews and analyzed for this summary.

## D. Organization of Report

The section on ***"Best Practices"*** is organized under headings which correspond to a sub-set of the SRF review elements cited above. Given that this report is based primarily on information drawn from the final SRF reports, a potential best practice was cited only if it

was discussed in an SRF report. There may be similar practices underway in other states or regions, but if they were not discussed in the SRF report, they could not be accessed for this summary. This is an additional reason to ensure that SRF reports contain sufficient detail to relay the complete picture of what is occurring within the state with regard to each review element. The states and regions are encouraged to submit additional information to EPA on potential best practices which may be underway in their states.

There is also a section on ***"Innovative Practices Cited under Element 13"*** based on information which states submitted during the SRF reviews under optional Element 13.

Finally, EPA has reviewed the recommendations for improvements from final SRF reports and summarized the ***"Program Improvements Expected to Result from SRF."*** These program improvements are dependent on implementation of the recommendations. EPA will expand this section after all of the SRF reviews have been completed.

The attachments provide an index to the best practices and innovative projects. The indices list the title of the best practice and a contact for more information.

## II. Best Practices

### A. State Inspection/Evaluation Coverage

1. Resident Inspector Program focusing on Commercial Hazardous Waste Facilities

In addition to traditional treatment, storage and disposal (TSD) inspections, for the past fifteen years, the North Carolina Department of Environment and Natural Resources has operated a Resident Inspector Program for monitoring compliance at the state's eleven permitted commercial hazardous waste facilities. These are facilities which accept hazardous waste generated from off-site locations. Most of the North Carolina commercial TSDs function as brokers who collect waste and ship bulk loads to out-of-state facilities.

The Resident Inspector Program is a multimedia program comprised of three inspectors who conduct between 2 to 6 unannounced inspections a month at each commercial TSD facility, depending upon the complexity of facility operations. State law mandates inspection fees and minimum inspection frequency for these facilities dependent on specific criteria outlined in state regulations. During these "focused compliance inspections," inspectors will concentrate on the day-to-day activities of the facility and monitor a sub-set of their activities during each visit. This level of inspection presence helps to ensure a high compliance rate. Collectively, more than 500 inspections are conducted each year by the Resident Inspector Program. This greatly exceeds the national guidance which calls for all operating TSDFs to be inspected every two years.

Since the inspectors visit these facilities at least semi-monthly, they have the opportunity to become very familiar with the operations of each facility and can offer compliance

assistance as appropriate. Inspectors increase scrutiny of past trouble areas during each visit to keep the facility's compliance awareness high. Inspectors communicate frequently with facility management and front-line workers to clarify the permit and regulatory requirements, the reasons for the requirements and the potential risks incurred for non-compliance, and hold roundtable training workshops customized for each specific facility.

2. RCRA Inspections of LQGs and Significant Reductions in Wastes

From FY 2000-2004, the Georgia Environmental Protection Division (GAEPD) inspected 93% of the large quantity generator (LQG) universe; the guidance calls for 100% to be inspected over a five year period. During FY 2004, GAEPD inspected 67% of their LQG universe, which is 47% more than that cited in the national guidance. GAEPD was able to inspect such a high percentage because of how its hazardous waste management programs are organized. The Generator Compliance Program, one of 4 hazardous waste programs at GAEPD, is responsible for compliance and enforcement activities at all large and small generators of hazardous waste, hazardous waste transporters, used oil and universal waste facilities that are non-government and do not have hazardous waste permits. This organization allows the Generator Compliance Program to focus efforts on inspecting all LQGs within 3 years, while the other hazardous waste programs focus on activities involving TSDs, corrective action facilities and state superfund sites. Georgia also invests more state funding in its hazardous waste program than the minimum federal match to enable a compliance presence that minimizes future releases of hazardous waste to the environment.

To achieve state-specific goals involving reduction of persistent, bio-accumulative or toxic (PBT) chemicals, the state focuses inspections at facilities that generate PBT waste. The state also requires facilities to have Hazardous Waste Reduction Plans. Waste was reduced 97.5% from 1995 to 2003 due to the state's focus on generators of PBT waste.

Each compliance officer reviews a facility's hazardous waste plan before he conducts an inspection of a specific large quantity generator. This information provides the most current wastes generated and updated schematics of the waste generating process so that the compliance officer knows what to expect on his inspection. In addition, it allows GAEPD to determine if the reduction plans are accurate.

Mandatory facility plans, combined with increased inspection coverage and a focus on certain types of facilities will likely result in increased compliance and achievement of the state's goals associated with those facilities.

3. Comprehensive NPDES Inspection Strategy

The Wisconsin Department of Natural Resources developed a comprehensive NPDES inspection strategy that outlines the Agency's expectations for the types and frequencies of inspections for various categories of permitees. It provides a level of detail that goes beyond the minimum expectations of EPA and was distributed to inspectors, which helps

to reinforce expectations and realize state goals. Such comprehensive inspection strategies can help set the stage for interested states to receive recognition or resource flexibility credit under Element 13 of the SRF.

4. Monthly Reminder Letters to Title V Facilities

The Arkansas Department of Environmental Quality generates monthly reminder letters to all Title V facilities reminding them of the date by which they are required to submit their Annual Compliance Certification and semi-annual monitoring reports. A state database lists all Arkansas Title V facilities and their respective due dates and tracks the receipt date for each required report. Reminder letters increase the likelihood of compliance and create a record that the regulated community was notified of the requirement.

**B. Documenting Inspection Findings and Accurately Identifying Violations**

5. CAA Field Inspection Report Template

The Indiana Department of Environmental Management uses a standard format for its compliance monitoring reports (CMRs) to assure that all seven of the required elements of an inspection are covered including: 1) general information; 2) facility information; 3) applicable requirements; 4) inventory and description of regulated emission units and processes; 5) enforcement history; 6) compliance monitoring activities (on-site observations and compliance assistance); and 7) findings observed and discussed with facility. The template facilitates the consistent completion of thorough inspections/evaluations and corresponding reports, which form the basis for sound follow-up, including enforcement actions, as appropriate. Documentation of activities and observations in the field is critical to ensuring that evidence is collected to support all violations so that a resulting enforcement action is not called into question.

6. CAA Full Compliance Evaluation (FCE) Report Form

The Idaho Department of Environmental Quality developed and utilizes a Full Compliance Evaluation (FCE) report form for documenting FCEs. Alaska similarly utilizes an Air Quality Compliance Evaluation report form. In both states, there are forms for evaluating annual compliance certifications, facility operating reports and source tests. The forms include all various sources of information reviewed for determining the compliance status of the facility. Inspection reports typically used the Title V permit conditions as a checklist, in addition to reviewing records and on-site observations. The reports accurately identified violations of all magnitudes, from high priority violations to deviations from permit conditions (e.g. late reports, incomplete reporting, missing monitoring, inaccuracies, exceeding parametric operating ranges, etc). Standard detailed forms facilitate the completion of thorough inspections/evaluations and corresponding reports, which form the basis for sound follow-up, including enforcement actions, as appropriate.

7. CAA Title V Checklist

The Rhode Island Department of Environmental Management (RIDEM) created a checklist for use during inspections of Title V sources which lists each condition of a Title V permit, the method used to determine compliance, and the compliance status of each condition and provides space for inspector comments per condition. The checklist helps to ensure that compliance determinations are made for each regulated emission unit at a Title V facility. RIDEM also created a checklist to make it easier for inspectors to determine when a full compliance evaluation is complete so that they can provide this data to RIDEM data entry personnel in a timely and complete manner for entry into the EPA data base.

8. RCRA Inspection Checklists Supported by Narrative

The New Jersey (NJ) Department of Environmental Protection utilizes separate RCRA inspection checklists for Large Quantity Generators, Small Quantity Generators (SQGs), conditionally exempt SQGs, and other types of facilities. Each checklist is segmented to denote specific regulatory requirements for manifest, pre-transport, record keeping and reporting, container management, preparedness and prevention, etc. The checklists also denote state-only generator requirements. Except for state-only requirements, each citation is made with reference to federal regulations; for each citation, the checklist allows the inspector to designate whether or not a facility is in compliance, out of compliance, of if there are potential violations. The checklist also allows the inspector to include comments or results for each citation.

In addition to checklists, inspection reports also include a narrative sufficient to give the reader a general description of facility operations, hazardous waste generation and management activities, and descriptions of any violations that may have been observed. Checklists and narratives are word-processing documents and are electronically stored in the State's compliance/enforcement database, NJEMS.

The checklist facilitates the completion of thorough inspections/evaluations and corresponding reports, which form the basis for sound follow-up, including enforcement actions, as appropriate.

## C. Completing Inspection Reports and Identifying Violations in a Timely Manner

9. Provision of Timely Reports and Management Approaches to Facilitate Timeliness

The eight states listed below: a) exceeded the national guidance on timely completion of inspection reports and completed reports in less than 30 days for particular media programs; and b) prepared inspection reports which, for the most part, ranged in quality from adequate to comprehensive, based on the reports read during the SRF review.

Rhode Island (CAA, RCRA, NPDES), New Hampshire (NPDES), New Jersey (NPDES),

Maryland (NPDES), New Mexico (RCRA), South Carolina (CAA), North Carolina (RCRA), Kansas (CAA), and the City of Albuquerque, New Mexico (CAA) were the entities that generally completed adequate reports in a very timely manner for the media programs highlighted above.

Supervisors use one or more of the following approaches in order to ensure timely and adequate reports:

- Set specific expectations as to when the reports must be completed and address this topic in performance appraisals;
- Monitor inspection dates and staff inspection report output;
- Call inspectors if they are lagging behind or, in the case of an automated system, provide an automatic reminder to both the inspector and supervisor; New Jersey's Environmental Management System (EMS) automatically calculates deadlines;
- Ask inspectors to review facility files prior to conducting the inspection which potentially saves time during and in follow-up to the inspection;
- Provide comprehensive checklists and/or standard formats for inspection reports to facilitate the preparation of adequate inspection reports;
- Where resources allow, provide laptops and/or other electronic tools to inspectors;
- Provide time for inspectors to complete the report (e.g. in North Carolina, Fridays are set aside as in-office days for completing reports, amongst other activities.)

The timely completion of adequate inspection reports allows for quicker resolution of potential violations and facilitates the enforcement process as necessary.

**D. State Enforcement: Timely and Accurate Reporting of Significant Violations**

10. Zero Tolerance Strategy Enhances Compliance within NPDES/CWA

The Georgia Environmental Protection Division (GA EPD) Zero Tolerance Strategy has proven to be effective in ensuring compliance. The State has implemented a zero tolerance strategy for water in a 14 county area in and around metropolitan Atlanta for the Coosa and Tallapoosa river basins, and the upper Chattahoochee river basin from the headwaters to Troup County. Under this strategy, all numeric permit limit violations (except flow), SSOs, delinquent DMRs, and failure to meet compliance milestones in existing enforcement actions will be addressed with an expedited order that includes a monetary penalty.

The orders are considered non-negotiable with the caveat that if the violator chooses not to sign the expedited action, which includes penalties less than traditional actions, then GA EPD will pursue additional enforcement, i.e. a traditional consent order containing more comprehensive corrective actions, and higher penalties. The orders have allowed GA EPD the ability to quickly initiate enforcement with a limited amount of resource, maximize enforcement over a relatively broad geographic area, and send a consistent and uninterrupted message to the owners of wastewater treatment and conveyance systems that effluent limit violations and un-permitted discharges are not tolerated.

11. Enhanced Water Quality Notification Regulations

In 1990, GA EPD revised its water quality regulations to enhance notification requirements and procedures for system owners who experience SSOs to state waters, i.e. notifications by the violator to GA EPD, the media and the public. The rules have been revised since that time to include other requirements. As a result, GA EPD is made aware of all spills that enter state waters, and through use of the zero tolerance strategy, can continually address all violations in the sensitive area, thereby enhancing protection of the environment.

12. HPV Training in Response to Identified Need

EPA Region 6 coordinated CAA training for their states in January and early March 2007 focusing on the policy for High Priority Violators (HPVs). This is in response to an identified need from their SRF reviews. A national CAA expert from OECA led the training, which was WebEx'ed in addition to being conducted in a classroom setting. The training addressed an HPV policy overview, general criteria, matrix criteria, case studies, and timely and appropriate enforcement. The training should help inspectors and/or enforcement officers to better identify and resolve HPV violations. Region 6 is going to prepare a CD which will include the power point presentation of the national expert and a national HPV workbook which is undergoing revision. The CD will be made available to any interested state.

13. Regional Conference Calls Facilitate Discussion of HPV Violations

EPA Region 10 hosts regular conference calls with each of their states to facilitate the reporting, discussion and resolution of high priority violations. The focus and frequency of the call (e.g. bimonthly or other timeframe) depends on each state's needs.

**E. Requiring State Facilities to Comply within Specific Time Frame**

14. Innovative File and Tracking System for Inspection/Enforcement Process

New Mexico developed a very innovative file system and tracking system for different aspects of the inspection/enforcement process. By entering a date of day zero, the database automatically determines interim deadlines that must be met within 270 days required by the CAA HPV policy. The New Mexico Environment Department tracks the accomplishment of corrective action in the data base as well. Both systems are reviewed by program managers to ensure compliance with milestones and schedule. Such systems facilitate efficiency and timeliness within the compliance/enforcement process.

15. CAA Filing System Facilitates Follow-up

Throughout the SRF file review process, EPA was impressed by the NH Department of Environmental Services CAA filing system and the meticulous manner in which it was uniformly observed. All the information (inspection, enforcement, stack testing, periodic

reports, emissions inventory, etc.) for each facility is in its own color-coded folder within the same file. Facility files are complete and easily locatable. The color coded system is consistently applied to all case files and makes it easier to ensure proper follow-up.

## F. Timely and Appropriate State Enforcement Actions in accordance with National ERPs

16. Zero Tolerance Strategy Mandates Penalties for Certain CWA Violations

The Quarterly Non-compliance Report (QNCR) Guidance Manual calls for enforcement action before two quarters of QNCR effluent violation at the same pipe for the same parameter. The number of facilities without timely action should not exceed 2% of the active major universe throughout the fiscal year. The Georgia Environmental Protection Division (GA EPD) consistently demonstrates timely action to address SNC, reporting an impressive 0% with the national average reported as 3%. GA EPD has reported no facilities without timely action. The GA regional district offices have responsibility for the first time response to effluent violations that are self-reported and the district offices are very responsive. In addition, the State has implemented a zero tolerance strategy for water in a 14 county area. This strategy is discussed further under item #10 earlier in this report and has facilitated timely and appropriate state enforcement actions.

17. Goals Document and Monitoring Enforcement Performance Measures

The EPA region identified Wisconsin's recently developed "Goals Document" as a potential best practice. This document presents overall environmental goals and related information such as subordinant performance measures, status on meeting those measures, and related success stories. Updates are provided to the region on a quarterly basis. One performance measure which will also be reflected in performance agreements in 2007 is an expectation that 96% of permit exceedances will be responded to within 90 days. Developing and tracking performance measures helps to identify practices within the compliance and enforcement program which may need improvement.

## G. Enhancing Data Quality

18. Review of NPDES Data

In FY 2004, the New Hampshire Department of Environmental Services (DES) initiated a two year program to target 37 facilities, about which they had questions, for a more thorough NPDES compliance review. Under this program, NH DES conducted a careful review of six months of laboratory records and discharge data reports from each targeted facility. DES sent letters to each facility that detailed its findings and requested that the facility respond in writing as to how it was going to address the identified deficiencies. All of the facilities responded and adequately addressed the deficiencies noted in the letters. This was an effective approach taken by DES to review NPDES monitoring and reporting in an effort to improve and ensure data quality and recordkeeping.

## III. Innovative Practices Cited under Element 13

This section provides highlights of innovative practices that were identified under element 13 of the State Review Framework. Provision of information under element 13 was not mandatory for the states and the information provided under element 13 was not scrutinized or analyzed by the SRF review team. We have included this separate section in order to share some examples of the innovative practices identified by the states during the SRF reviews.

### A. Innovations in Achieving and Promoting Compliance

1. ERP for Sectors with Health/Environmental Needs: The Rhode Island Department of Environmental Management (DEM) is developing and implementing both voluntary and mandatory Environmental Results Programs (ERPs) for industrial sectors where there is an identified human health and environmental need. These sectors include: auto-body, underground storage tanks (including retail gasoline, heating oil and hazardous chemical storage), auto salvage yards, and exterior lead pain removal contractors.

Components of the ERP programs include self-certification checklists, return to compliance forms, performance measurement (statistically based inspections and analysis of self-certification checklists), and technical and compliance assistance including workshops, workbooks, and on-site assistance.

The ERP program provides RIDEM with a great deal of performance measurement data. The program generates a complete assessment of compliance data from the self-certification checklists for the entire sector. Baseline and follow-up inspections provide compliance information from a statistically significant subset of the sector and help to assure the accuracy of the self-certification checklists. For the auto-body and UST sectors, RIDEM is working with stakeholders to develop Environmental Business Practice Indicators to separate and more easily track the most important sector specific environmental performance indicators.

A state should exercise some caution when pursuing numerous ERPs. It's important that traditional pollution prevention and compliance assistance still be provided to other sectors as needed.

2. ERP for Dry Cleaners, Printers, Photo processors: Since 1996, the Massachusetts Department of Environmental Protection (MA DEP) has implemented an innovative program called the Environmental Results Program (ERP). ERP addresses emissions and discharges from sectors comprised of many small facilities (e.g. dry cleaners, printers, photo processors) that would otherwise not receive much attention, but that cumulatively have significant environmental impacts. The basic components of the MA ERP are:

- A valid measurement system regarding compliance and environmental performance of the sector;
- Self-certification of compliance status by a responsible company official;

- Compliance assistance to enable facilities to understand their environmental responsibilities, how to fulfill them, and how to complete self-certification of compliance; and

- A state compliance and inspection program in the sector, including verification of the self-certified compliance status of facilities as a means to validate the program.

In the eight years that MA has implemented its dry cleaner ERP, it has seen significant improvement in the sector's performance and compliance. To evaluate performance, MA DEP tracks several Environmental Business Practice Indicators (EBPIs), which are the key regulatory requirements the dry cleaners are subject to and key "good environmental practices" that the dry cleaners should implement. An average EPBI score was developed as a result of inspection reports generated by MA DEP inspectors. The EPBI score for a facility is the number of EBPI's on the inspector's checklist that the facility is in compliance with or implementing, compared to the total number of EBPI questions, on a scale of 1 to 10.

For example, an EPBI score of 9.8 out of 10 means that, on average, the dry cleaners inspected by MA DEP were observed to be in compliance with 98% of the EBPIs. The dry cleaner sector's average EBPI score went from 8.4 in 1997 to 9.8 in 2002.

3. Sweeps: The New Jersey Department of Environmental Protection has developed a mode of operation, termed a "Sweep" that lends itself to addressing specific environmental problems or geographic areas. The defining characteristics of a Sweep typically include: a) targeted to a problem and supported by data; b) carefully planned with stakeholder input: c) multi-program and/or multi-agency involvement with cross training or exposure; d) outreach to inform and educate those impacted/targeted as well as the press and the public; and e) results tracked and reported.

Some examples of the Sweeps conducted previously include: Marina Compliance Assistance Project; Agriculture Worker Safety Initiative, Hazardous Waste Generator Initiative, TrashNET – A Solid and Hazardous Waste Enforcement Initiative, Camden City Sweep, Asbury Park Hazardous Waste Sweep, Paterson City Sweep and Diesel Truck Idling Initiative.

4. Advisories: The NJ Department of Environmental Protection's (NJ DEP) advisories represent a projection of concerns out in front of actions. Where classic enforcement philosophy would seek to capture the maximum number of violators in addressing a suspected cause of environmental harm, the advisory system represents the opposite. The advisories express compliance and enforcement thinking and concerns ahead of our actions in the hopes of effecting changes without the need to take action. This saves on DEP resources, affects changes sooner and is a welcomed opportunity by regulated business to be proactive in addressing concerns. NJ DEP has issued more than 20 advisories, which are distributed in targeted mailings as well as through their advisory listserv. These advisories are similar in concept to EPA's Enforcement Alerts. A list of NJ's advisories is available at http://www.state.nj.us/dep/enforcement/advisories.html

NJ utilizes three different types of advisories:

Enforcement Alerts – *Anticipated enforcement activities*
Enforcement Alerts highlight areas of concern within the DEP where some change will likely result in increased observation of non-compliance and/or more strict enforcement. The change might be a new or modified rule, a shift in DEP policy, or a targeted effort to address a specific environmental issue.

Warnings – *Emerging patterns of non-compliance*
Compliance Advisory Warnings highlight non-compliance issues experienced by others. These problems may be common or recurring or they may be newly emerging serious problems.

Updates – *Incentives and compliance assistance opportunities*
Compliance Advisory Updates highlight an opportunity to improve compliance on your own, reduce your liability or potentially avoid regulation altogether.

5. Portable Analyzer Testing – The Oklahoma Department of Environmental Quality (ODEQ) has developed a standard protocol for testing portable engine analyzers. All facilities must comply with the developed standard protocol, or other alternative protocol which must be approved prior to use. ODEQ worked with industry to develop the standardized protocol. As a result, there is significant increased compliance by affected facilities. The number of facilities affected by this compliance assistance project is estimated to be between 400 and 500.

6. NC Forsyth County Air Quality Awards - While NC's Forsyth County Environmental Affairs Department fully understands its role to enforce air quality and permitting requirements, and act as a technical resource to assist regulated facilities achieve and maintain compliance, staff from the NC Department of Environment and Natural Resources assist the Forsyth County Environmental Affairs advisory board (EAB) in recognizing the efforts of permitted facilities in their compliance efforts. The EAB confers Air Quality Awards to permitted facilities each year that operate without receiving a Notice of Violation. During FY 2003, the EAB issued 130 Air Quality Awards to permitted facilities in Forsyth County. In addition to these awards, the EAB also solicits applications from permitted facilities for Special Air Quality and Special Environmental Awards. The Special Air Quality Award is presented to those companies/agencies that have reduced their air pollution beyond regulatory requirements and the Special Environmental Award reflects efforts made by companies/agencies to control pollution in any environmental media.

7. Environmental Innovations Pilot Program – The South Carolina General Assembly enacted legislation creating a pilot program designed to allow participating facilities to test and demonstrate alternative environmental approaches. Up to 10 facilities may participate in the program, and eligibility to participate is based on a facility either being a member, or meeting the criteria to be a member, of the SC Environmental Excellence program. The participating facility and the South Carolina Department of Health and

Environmental Control (SCDHEC) enter into an enforceable cooperative agreement that allows the facility to undertake environmental improvements that may not be authorized under existing laws or regulations. In return, the facility must show greater pollutant reductions, administrative cost savings or reduction for both the agency and the facility, or energy and/or resource conservation results. The first cooperative agreement was finalized in 2004 and the second is in negotiations. Two other facilities have expressed interest.

8. Full Quantity Generator (FQG) Hazardous Waste Coordinator Certification Program - The NH Department of Environmental Services (DES) FQG Hazardous Waste Coordinator Certification (HWCC) program is designed to provide a sustainable forum for educating and certifying generators of hazardous waste in the complex regulatory area of hazardous waste management. The program requires all hazardous waste generators producing 220 pounds of hazardous waste or more in a month to have on staff, at the facility where the hazardous waste is generated, a Hazardous Waste Coordinator (HWC) certified annually by the DES.

To implement this new program, DES designed a comprehensive one-day HWCC course. First time applicants attending the basic course must take a written exam which they must pass to become state certified. Once certified, the HWC may renew their certification on an annual basis. The HWC has the option to retake the basic course or select from a list of advanced courses. The program is funded by an annual certification fee of $125 and a $75 fee per course. Recent EPA inspections have shown improved compliance at facilities that successfully completed the FQG certification program.

9. Small Quantity Generator (SQG) Self-Certification Program – This New Hampshire DES program requires SQGs to complete and submit a Self-certification and Declaration of Compliance Form (Self-certification form) to DES once every three years. To complete the form, the generator is required to review its hazardous waste activity and conduct a compliance evaluation inspection of its facility for compliance with the applicable SQG rules. SQGs determined to be in compliance mark the self-certification form accordingly and sign a declaration of compliance certification statement. SQGs determined not to be in compliance must submit a corrective action plan which describes the actions the facility will take to come into compliance. The corrective actions are required to be made as soon as possible, but in no event later than 90 days from the date the self-certification form is due. Facilities out of compliance are required to sign a certification statement that the information provided is true and accurate.

Recalcitrant SQGs that failed to submit their forms by January 1 received a phased enforcement response that included: a phone call to provide direct assistance, a first notice of non-compliance letter, a follow-up site visit, a final notice of non-compliance sent by certified mail which threatens administrative fines, and finally a Notice of Proposed Administrative Fine.

**B. Efficiencies in Reporting, Tracking and Access to Compliance Tools**

1. Tablet PC Pilot – In a pilot study on the use and deployment of Tablet PC's to support inspections, the Rhode Island Department of Environmental Management (RIDEM) has partnered with a computer consultant/contractor to evaluate their business processes and build a prototype application to support and automate several aspects of the inspection of underground storage tanks (UST) systems. The system prototype will allow the inspector to fill out an electronic checklist in the field, automatically upload that information to a compliance information database on return to the office, and forward the completed checklist and recommendation for follow-up to the program supervisor.

In addition, RIDEM developed a self-certification checklist process for UST owners/operators so that they can meet a mandatory Environmental Results Program requirement for all USTs. This includes a self certification checklist and return to compliance report if corrections are needed. This checklist is the same inspection checklist that RIDEM's inspectors use and is compatible with the Tablet PC. The inspector can use the same checklist to go on site to check compliance. The Agency's hardware (server) is being upgraded to run the program. The results of the pilot study will be included in the updated version of this best practices report as appropriate.

2. Tracking Work Flow – In this second pilot, the RIDEM retained a contractor to create a web based application to allow tracking of tasks and timelines in the leaking underground storage tank (UST) program. The business processes were defined and incorporated into the system, target timelines were defined, and a regular, automatic reporting function was set up. The system is operational.

RIDEM then hired a computer consultant to expand the tracking and work flow effort into the overall enforcement arena. For the first time in over ten years, RIDEM's enforcement office has a single tracking system for complaints, compliance monitoring targets, informal enforcement actions, formal enforcement actions, tracking of cases in litigation, tracking of cases that have settled but must be monitored for continuing performance and closure of cases. Performance results can be obtained from this system. The system went on line in March 2007 and updates will be provided in the expanded version of the best practices report.

For both RI pilots, reporting is real time through a web interface to RIDEM managers. The effort freed by eliminating collection and compilation of this information can be redirected to increased compliance and enforcement efforts and greater efficiencies in analysis of information.

3. Web-based Standard Forms – The Oklahoma Department of Environmental Quality has developed several web-based forms and documents to assist in compliance assurance efforts. They include Annual Compliance Certification (ACC) forms, excess emissions reports, demonstration of cause forms, and a document entitled, "Calculation of Flashing Losses/VOC Emissions form Hydrocarbon Storage Tanks." Since the development and implementation of the ACC forms, certification of compliance with the standard conditions of the permit has increased from less than 50% to 100%. Excess emissions reports are now consistent in format and contain each element required by the applicable

rule. The standardization of calculation of flashing losses from hydrocarbon storage tanks was a collaborative development effort with industry and has increased the number of identifications of Title V major sources, minor sources and emissions violations of permits.

4. Enforcement Desk Reference - The Connecticut Department of Environmental Protection has developed an electronic enforcement resource library for all enforcement related documents that assists in the implementation of a consistent and predictable enforcement program across all air, water and materials management programs. The Enforcement Desk Reference (EDR) is a valuable enforcement tool that is located on the Department's intranet site to give all staff immediate access to the most current enforcement policies, formats, forms and instructions needed to complete enforcement actions.

The EDR includes an enforcement process diagram that depicts the steps of the enforcement process and provides links to the available enforcement tools. As a result, employees are guided to the right documents associated with a particular type of action. Staff is able to select the appropriate form and save it to their case file and immediately begin entering information with the confidence that it is the correct form.

For example, the Department has developed new case documentation forms to assure consistent application of enforcement policies. The EDR provides forms for the Enforcement Action Summary (EAS), Consent Order Data Sheet (CODS) and the Case Milestone Summary (CMS). The EAS is used to present the facts of the case and to recommend a course of action. It assures that all violations associated with a case are properly identified and classified and coordinated with other applicable programs and that the compliance history of the violator is evaluated. The CODS is used for consent orders to document any changes in the Department's position as a result of negotiations such as changes in the final penalty amount or the injunctive relief required, inclusion of supplemental environmental projects, and explanation of any exceedance in the enforcement action issuance timeframe as specified in the Department's Enforcement Response Policy. The CMS is used for documenting important information and dates associated with case development, issuance and closure. The CMS is intended to allow anyone who reviews the file to quickly determine the current status of the case.

Also included in the EDR are the most current enforcement action formats used by the Department, such as consent and unilateral orders and referrals to the Attorney General or Chief State's Attorney. Boiler plate language is included to assure that all enforcement actions issued by the Department are consistent. There is formatted language regarding, for instance, dates of issuance, approval processes, compliance audits, supplemental environmental projects and corporate resolutions.

The EDR also provides links to EPA's Online Tracking Information System and the BEN and ABEL computer models as well as the Secretary of the State's website to obtain corporation information. This project was identified as a potential best practice by the regional office and is discussed in their draft SRF report.

**C. Moving Beyond Compliance**

1. SEP EMS Compliance Option – The Alabama Department of Environmental Management (ADEM) has created the Supplemental Environmental Projects (SEP) EMS Compliance Option. Offending facilities in Alabama are provided the option to design and implement an EMS which not only addresses the concerns in question, but serves to achieve environmental benefits beyond those which would be realized through traditional enforcement requirements. The agreement with the facility requires additional monetary resources to be applied towards the facilities' EMS than that required for a non-compliance penalty.

The facility electing to participate is provided assistance in EMS development and implementation by ADEM personnel who are trained in the selection of appropriate pollution prevention opportunities. The implemented EMS serves not only to eliminate problems in the area(s) cited, but in all aspects of the facility's environmental responsibilities. The program provides for additional penalties for non-completion of the EMS while still maintaining the requirement for full compliance.

2. Green Zia Environmental Excellence Program – This New Mexico program is a performance-based pollution prevention program that includes core values and criteria that serve as a valuable self-assessment tool for any organization, regardless of size and sector. The program supplies businesses with a set of tools that can be easily adopted into core business principles. It has three progressive levels of participation that encourage continuous improvement and learning: a) Commitment Recognition – for organizations that are beginning to put an EMS in place; b) Achievement Recognition – for organizations that have a system in place and are demonstrating progress and good results; and c) the Excellence Award – for organizations with a mature, well deployed EMS. Excellence Level recipients have sometimes gone beyond compliance.

The program does not focus on a particular environmental media, but includes water, waste and air. Over 100 organizations have participated in the Green Zia program from 1999 to 2005. Minimum cost savings reported from 1999 – 2004 has been approximately $ 46.6 million as a result of environmental improvements and pollution prevention. In the year 2004, participants saved approximately $ 213,500, reduced over 200,000 lbs of hazardous waste and diverted and recycled approximately 31,772 tons of materials from the landfill.

3. North Carolina Environmental Stewardship Initiative: Regulatory approaches do not address all environmental impacts and are media specific, frequently causing pollution to be moved from one media to another. The Environmental Stewardship Initiative (ESI) of the NC Department of Environment and Natural Resources (NCDENR) is a voluntary program designed to promote superior multi-media environmental performance by the regulated community. The program provides benefits to stimulate the implementation of programs that use pollution prevention and innovative approaches to meet and go beyond regulatory requirements.

The ESI program has three levels of membership: Environmental Partner, Rising Environmental Steward and Environmental Steward. The level of membership depends, in part, on whether or not an EMS is already in place and how mature it is, along with other criteria. One common criterion for acceptance into each of the three levels of the program is a commitment to compliance.

Assigned coaches provide assistance with compliance issues, EMS development, achieving goals and coordinate with the appropriate DENR agency on regulatory issues. Access to a coach, the development of an EMS, workshops and networking meetings are the primary tools used in the ESI to help participants achieve, maintain, and eventually exceed compliance. Participants report annually on progress toward environmental performance goals, reductions in environmental emissions or discharges of releases, solid and hazardous waste disposal, use of energy and water, and any reportable non-compliance events.

**D. Compliance Assistance/Technical Assistance**

1. Delivery of hazardous waste reporting forms – In the South Carolina Department of Health and Environmental Control, when an EPA identification number is assigned to a handler, the district RCRA inspector personally delivers the hazardous waste reporting form to the handler. The visit allows the handler to meet the inspector and ask questions regarding hazardous waste management activities, while the district inspector offers compliance assistance.

2. Multi-media Environmental Circuit Rider Program for Small Municipalities – Small municipalities in South Carolina do not have the resources or expertise to understand a myriad of environmental requirements and many find themselves subject to enforcement for noncompliance, particularly in the drinking and waste water programs. In the past, the SC Department of Health and Environmental Control implemented the Environmental Circuit Rider Program in two districts with 48 municipalities participating. A circuit rider for each district conducted on-site technical assistance visits with municipalities using a multi-media checklist developed for the project.

3. Chemical Industry Sector Compliance Assistance Initiative – In South Carolina, 43 small specialty chemical facilities participated in Phase 1 Compliance Assistance Workshops covering issues in land, air and water. Phase II consisted of on-site compliance assistance visits with follow-up visits/contact as needed. At the site visit, specially prepared compliance assistance packets were distributed. Site visit evaluation forms were completed by the team, and follow-up letters indicating compliance issues and providing a period of time to correct them were sent.

4. Greenstart – The New Jersey Department of Environmental Protection (NJDEP) has developed a compliance assistance program known as Greenstart to proactively help small businesses and municipalities comply with their environmental obligations. Greenstart is a multimedia environmental compliance assistance program providing free

on-site consultations by qualified NJDEP employees. The program assists facility owners and operators in interpreting environmental regulations and evaluating compliance in the areas of air, water and pesticides, pollution control, solid and hazardous waste management, Right-to-know, Toxic Catastrophe Prevention Act, and spill containment plans. If violations are discovered during the process, a grace period of up to six months is provided, except for egregious violations. At the closing of the on-site consultation, preliminary findings and compliance requirements are reviewed. A comprehensive report of findings and recommendations is issued to the facility after the on-site visit. If necessary, follow-up visits ensure that identified problems are corrected within an agreed-upon time period.

5. NPDES Compliance Assistance Program – The Alabama Department of Environmental Management has introduced an innovative, proactive program to help wastewater treatment systems throughout Alabama address potential compliance issues associated with NPDES permits. The Compliance Assistance Program of the Department's Permits and Services Division is lending technical and compliance assistance annually to more than 100 municipal, semi-public and private wastewater treatment facilities in Alabama that hold NPDES permits; these facilities include many schools, nursing homes, the Department of Corrections, and the Department of Transportation, that have older, individual wastewater treatment systems. In many instances, these systems do not connect to larger municipal systems and are further inhibited by lack of sufficient funding for infrastructure construction and maintenance.

The Compliance Assistance Program, which is offered at no cost to wastewater treatment systems, has also partnered with the Alabama Rural Water Association and the Rural Community Assistance Program to lend assistance to small rural wastewater treatment facilities that experience compliance problems.

## IV. Program Improvements Expected to Result from SRF

Based on discussions between EPA and the states, the State Review Framework is expected to result in numerous program improvements across the country. EPA reviewed the recommendations which the EPA regions had finalized as of May 2007 and summarized on the SRF Tracker, an internal tracking tool for EPA. Based on these recommendations, EPA expects that the following program improvements, which impact more than one state, will be implemented:

Inspection Coverage and Reports

1. More comprehensive and timely inspection reports;

With regard to the inspection reports reviewed to date, the following statements are examples of the necessary improvements/recommendations included in final SRF reports:

- Reports should be complete and timely.

- Narrative should be included and consistent with the inspection checklist.
- There should be sufficient detail to allow supervisors and others to be able to ascertain how reviews and other activities were conducted on site.
- CAA reports should provide an accurate inventory of all regulated emissions units and provide a compliance determination for each one. Enforcement history and excess emissions should be discussed. The necessary elements are discussed in the Compliance Monitoring Strategy.
- Documentation of transportation, storage and disposal (TSD) violations should be improved.
- RCRA inspection reports should include the following three elements consistent with EPA's Revised RCRA Inspection Manual (1998): a narrative discussion (including a description of facility operations and inspection findings); an inspection checklist; and supporting documentation.
- Inspection forms should be more inclusive of facility specific requirements for sources.
- All applicable air program requirements should be evaluated and documented during inspections (even if these requirements are not contained in the permit). Supervisors should check reports for this.
- A consistent protocol for documenting facility hazardous waste management activities should be established and used during inspections.
- CAA reports should indicate if the review was a Full Compliance Evaluation (FCE) or partial FCE.
- CAA reports need adequate detail regarding enforcement history consistent with the Compliance Monitoring Strategy (CMS). If there was no past enforcement at the source, this should be stated.
- Inspectors should use a consistent Compliance Monitoring Report (CMR) template for reports to ensure their timeliness and completeness.
- States need to develop standardized inspection reporting protocol or standard operating procedures that specify the level of detail to be included in reports.
- Inspection reports should include the date on which they were completed.
- The state should ensure that the necessary elements for conducting a full inspection, including evidentiary elements to support any potential violations observed at the time of the inspection, are documented for every inspection.
- Reports should include photographs.
- EPA needs to perform oversight inspections.
- Refresher training should be provided to inspectors on the required elements of inspection reports.

2. Improvement of RCRA inspection coverage for Large Quantity Generators (LQG) in accordance with national guidance within a few states;

<u>HPVs/SNCs</u>

3. More timely and better identification, reporting and resolution of High Priority Violations (HPVs) and Significant Non-Compliers (SNCs);

For example, SRF reports finalized to date have identified the need to:

- Determine why HPVs and SNC identification is low within specific states and prepare a plan to improve identification;
- Ensure that all violations that warrant identification as an HPV are identified as such;
- Document HPV determinations for all majors and synthetic minors found to be in violation;
- Ensure that HPVs are reported to EPA within timeframes specified by the HPV policy;
- Prioritize enforcement actions within states so that HPVs are addressed in a timely manner;
- Provide training on, and reinforce the importance of, properly identifying, reporting and taking action on HPVs and SNCs within the RCRA program;
- Increase timely communication between the state and EPA when questions arise concerning HPV determinations;
- Report HPV activities to AFS consistent with policy timeframes;
- Report CWA single event violations arising from major facility compliance monitoring consistent with national guidance.

Penalty Calculations and Documentation

4. Factoring economic benefit into penalty calculations, using penalty calculation worksheets to document both the gravity and economic benefit components of a penalty and including them in the files, recovering economic benefit, and including appropriate documentation of penalty collection in the files;

Records Management

5. Enhancing record management practices to ensure proper maintenance and centralization of compliance and enforcement files;

Data Quality and Reporting

6. Improvements in the timely and accurate entry of data into RCRAInfo, the Air Facility Subsystem (AFS) and the Permit Compliance System (PCS) data base.

   Examples of specific issues which must be addressed, per data system, are highlighted below.

   a. RCRAInfo
      - Enter accurate SNC data in timely manner;
      - Correct data discrepancies;
      - Reconcile TSD lists.

b. Air Facility Subsystem (AFS)
   - Reflect in AFS data regarding sources' compliance status, enforcement actions and penalties;
   - Upload and reconcile inspection data;
   - Update AFS to reflect true population of sources;
   - Correct status codes and data discrepancies;
   - Conduct quality assurance checks more frequently within AFS;
   - Enter Notice of Violation data in timely manner;
   - Provide greater oversight of data entry in AFS; and
   - In general, enter required data in timely and comprehensive manner.

c. Permit Compliance System
   - Increase data entry;
   - Report single event information in PCS; and
   - Enter violations, enforcement actions and penalty data directly into PCS.

Timely Enforcement

7. Timely determination of violations and appropriate actions in accordance with enforcement response policy guidelines; and

8. Preparation of penalty policies within a couple of states.

The above list does not encompass recommendations/program improvements which impact only one state or which were not posted on the SRF tracker. This list will be expanded after the remaining SRF reviews are completed, the reports are finalized and the remaining recommendations are posted on the SRF tracker.

Attachment 1

# Index of Best Practices Included in Draft Report

| Titles (Page of report which discusses project) | Contact Information (Name, number and email) |
|---|---|
| 1. NC Resident inspector program (p.3) | Mike Brailsford, 919-508-8532<br>Michael.brailsford@ncmail.net |
| 2. GA RCRA Inspections of LQGs and Significant Reduction in Wastes (p.4) | Doralyn Kirkland, 404-651-7968<br>doralyn.kirkland@dnr.state.ga.us |
| 3. WI Comprehensive NPDES inspection strategy (p.4) | Duane Schuettpelz,608-266-0156<br>Duane.schuettpelz@dnr.state.wi.us |
| 4. Arkansas Monthly reminder letters to Title V Facilities (p.5) | Ann Blake, 501-682-0578<br>blake@adeq.state.ar.us |
| 5. IN CAA field inspection report template (p.5) | Phil Perry, 317-232-8457<br>pperry@idem.in.gov |
| 6. CAA full compliance evaluation report form | |
| Idaho (p.5) | Mike Simon, 208-373-0212<br>Michael.simon@deq.id.gov |
| Alaska (p.5) | Jim Baumgartner, 907-465-5108<br>Jim.baumgartner@dec.state.ak.us |
| 7. RI CAA Title V checklist (p.6) | Ted Burns, 401-222-2808, ext7013<br>Ted.burns@DEM.RI.GOV |
| 8. NJ RCRA inspection checklists supported by Narrative (p.6) | Knute Jensen, 609-292-6549<br>Knute.jensen@dep.state.nj.us |
| 9. Provision of timely inspection reports (p.6) | |
| Rhode Island (RCRA, NPDES, CAA) | Dean Albro,<br>401-222-4700, ext. 7431<br>Dean.albro@DEM.RI.GOV |
| New Hampshire (NPDES) | Stergio Spanos, 603-271-6637<br>sspanos@des.state.nh.us |
| New Jersey (NPDES) | Knute Jensen, 609-292-6549<br>Knute.jensen@dep.state.nj.us |
| Maryland (NPDES) | Thomas C. Boone, 410-537-3510<br>tboone@mde.state.md.us |
| New Mexico (RCRA) | James Bearzi, 505-428-2512<br>James.bearzi@state.nm.us |
| South Carolina (CAA) | Robin S. Stephens,<br>803-896-8973<br>stephers@dhec.sc.gov |
| North Carolina (RCRA) | Jill Pafford, 919-715-4193<br>Jill.pafford@ncmail.net |
| Kansas (CAA) | Vick Cooper,785-296-1561 or<br>Russ Brichacek,785-296-1544<br>RBrichac@kdhe.state.ks.us |

| | |
|---|---|
| Albuquerque, New Mexico (CAA) | Billy Gallegos, 505-768-1972<br>bagallegos@cabq.gov |
| 10. GA Zero Tolerance Strategy (p.7) | Doralyn Kirkland, 404-651-7968<br>doralyn.kirkland@dnr.state.ga.us |
| 11. GA Enhanced Water Quality Notification Regs (p.8) | Doralyn.Kirkland,404-651-7968<br>Doralyn.kirkland@dnr.state.ga.us |
| 12. Region 6 HPV training (p.8) | Toni Allen, 214-665-7271<br>Allen.toni@epa.gov |
| 13. Region 10 Calls facilitate discussion of HPV Violations (p.8) | John Keenan, 206-553-1817<br>Keenan.john@epa.gov |
| 14. NM Innovative file/tracking system (p.8) | Larry Hewitt, 505-827-1494<br>Larry.hewitt@state.nm.us |
| 15. NH CAA filing system facilitates follow-up (p.8) | Barbara Hoffman, 603-271-7874<br>bhoffman@des.state.nh.us |
| 16. GA Zero tolerance strategy mandates penalties (p.9) | Doralyn.Kirkland,404-651-7968<br>Doralyn.kirkland@dnr.state.ga.us |
| 17. WI Goals document and monitoring Enforcement performance measures (p.9) | Duane Schuettpelz,608-266-0156<br>Duane.schuettpelz@dnr.state.wi.us |
| 18. NH Review of NPDES data (p.9) | Stergio Spanos, 603-271-6637<br>sspanos@des.state.nh.us |

Attachment 2

# Index of Innovative Practices under Element 13 Included in Draft Report

| Titles (and Page of report which discusses each project) | Contact Information (Name, number and email) |
|---|---|
| 1. RI ERP for Sectors with Health/Environmental Needs (p.10) | Dean Albro, 401-222-4700, ext. 7431 Dean.albro@DEM.RI.GOV |
| 2. MA ERP for Drycleaners, printers, photo processors (p.10) | Steven Degabriele, 617-556-1120, steven.degabriele@state.ma.us |
| 3. NJ Sweeps (p.11) | Knute Jensen, 609-292-6549 Knute.jensen@dep.state.nj.us |
| 4. NJ Advisories (p.11) | Knute Jensen, 609-292-6549 Knute.jensen@dep.state.nj.us |
| 5. OK Portable Analyzer Testing (p.12) | Brad Flaming, 405-702-4151, Brad.Flaming@deq.state.ok.us |
| 6. NC Forsyth County Air Quality Awards (p.12) | Jill Pafford, 919-715-4193 Jill.pafford@ncmail.net |
| 7. Environmental Innovations Pilot in SC (p.12) | Robin S. Stephens, 803-896-8973, stephers@dhec.sc.gov |
| 8. NH FQG Hazardous Waste Coordinator Certification (p.13) | John Duclos, 603-271-1998 jduclos@des.state.nh.us |
| 9. NH SQG Self-Certification Program (p.13) | John Duclos, 603-271-1998 jduclos@des.state.nh.us |
| 10.RI Tablet PC Pilot (p.14) | Dean Albro, 401-222-4700, ext. 7431 Dean.albro@DEM.RI.GOV |
| 11. RI Tracking Work Flow pilot (p.14) | Dean Albro, 401-222-4700, ext. 7431 Dean.albro@DEM.RI.GOV |
| 12. OK Web-based standard forms (p.14) | Roy Walker, 405-702-7188, Roy.walker@deq.state.ok.us |
| 13. CT Enforcement Desk Reference (p.15) | Nicole Morganthaler 860-424-3611 Nicole.lugli@po.state.ct.us |
| 14. AL SEP EMS Compliance Option (p.16) | Mariyln Elliot, 334-271-7710 mge@adem.state.al.us |
| 15. NM Green Zia Environmental Excellence Program (p.16) | Michelle Vattano 505-827-0677 Michelle.vattano@state.mn.us |
| 16. NC Environmental Stewardship Initiative (p.16) | Jill Pafford, 919-715-4193 Jill.pafford@ncmail.net |

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|---|---|
| 17. SC Delivery of hazardous waste reporting form (p.17) | Robin S. Stephens, 803-896-8973 stephers@dhec.sc.gov |
| 18. M2 Environmental Circuit Riders in SC (p.17) | Robin S. Stephens, 803-896-8973, stephers@dhec.sc.gov |
| 19. SC Chemical Industry Sector CA Initiative (p.17) | Robin S. Stephens, 803-896-8973, stephers@dhec.sc.gov |
| 20. NJ Greenstart (p.17) | Knute Jensen, 609-292-6549 Knute.jensen@dep.state.nj.us |
| 21. AL NPDES Compliance Assistance Program (p.18) | Mariyln Elliot, 334-271-7710 mge@adem.state.al.us |