

The Environmental Results Program (ERP)

An EPA/State Collaborative Opportunity

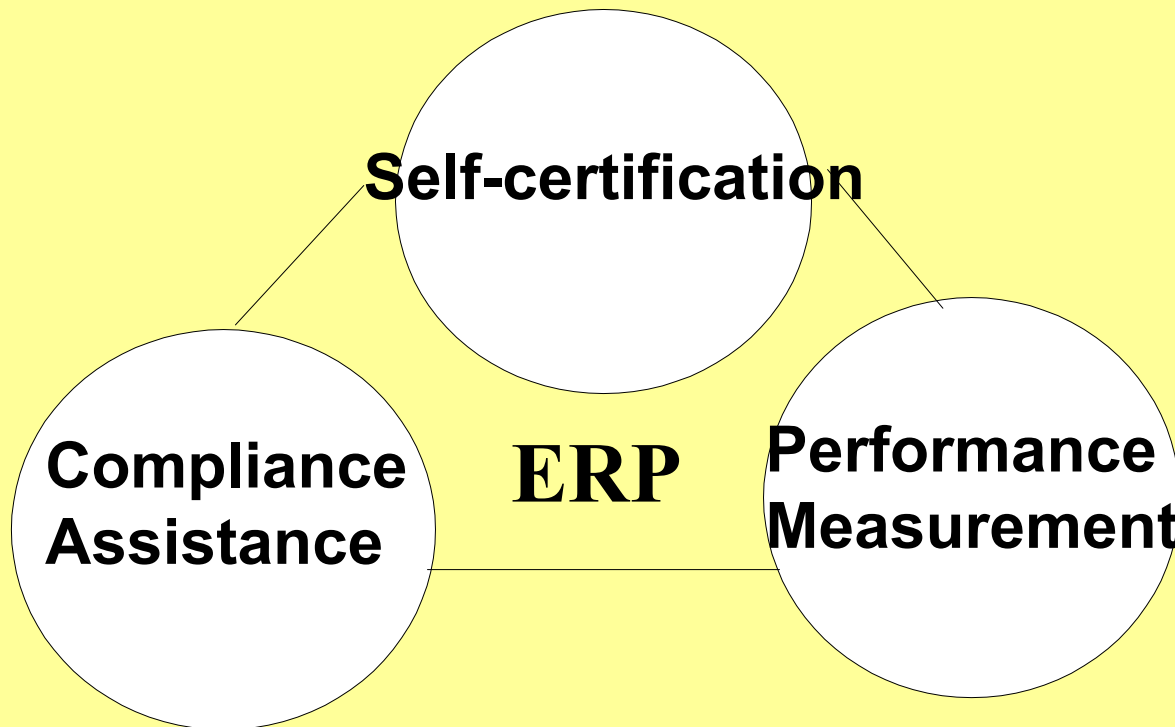
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Today's Presentation Will:

- Outline ERP approach and tools
- Highlight States' ERP experience
- Describe ERP benefits and results
- Explain EPA's role and assistance opportunities

What is ERP?

- Alternative regulation/inspection model

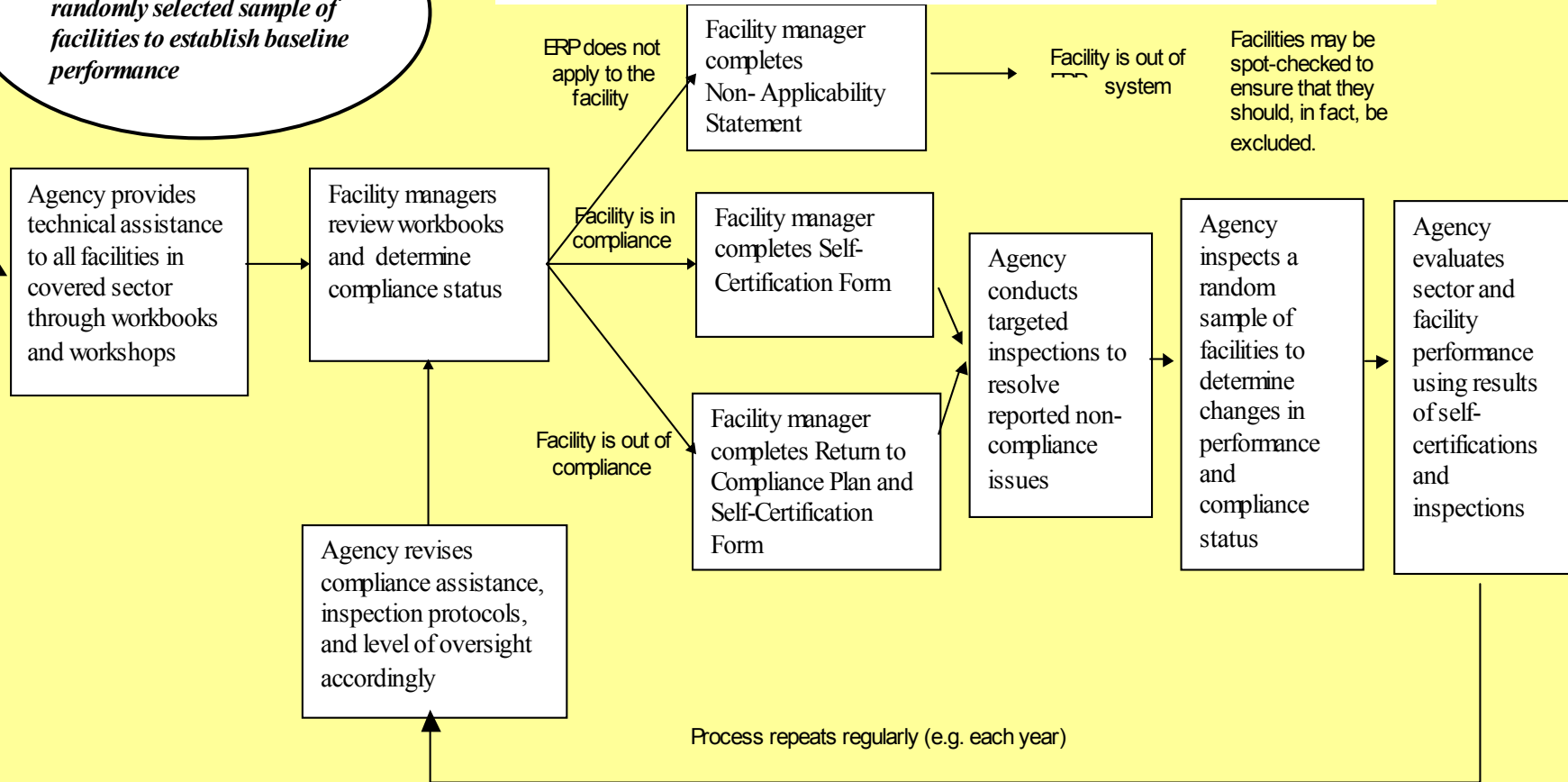


How ERP Works

- Identify the universe of facilities
- Establish Environmental Business Practice Indicators (EBPIs)
- Establish baseline measures via inspections
- Provide compliance assistance/training
- Require facility self-audits and self-certification of compliance
- Follow up with inspections to evaluate and target areas of concern

How ERP Works

Prior to ERP, Agency conducts inspections at randomly selected sample of facilities to establish baseline performance



ERP Performance Measures/Methodology

- Percent change in number of regulated facilities
- Percent change in compliance rates
- Outcome measures
- Statistically valid compliance inspections (baseline and annual); random and targeted
- Environmental Business Practice Indicators (EBPIs)
- Score/Performance Measure (e.g., facility, industry, indicators)

EBPI's for ERP Printers

Regulatory Indicators:

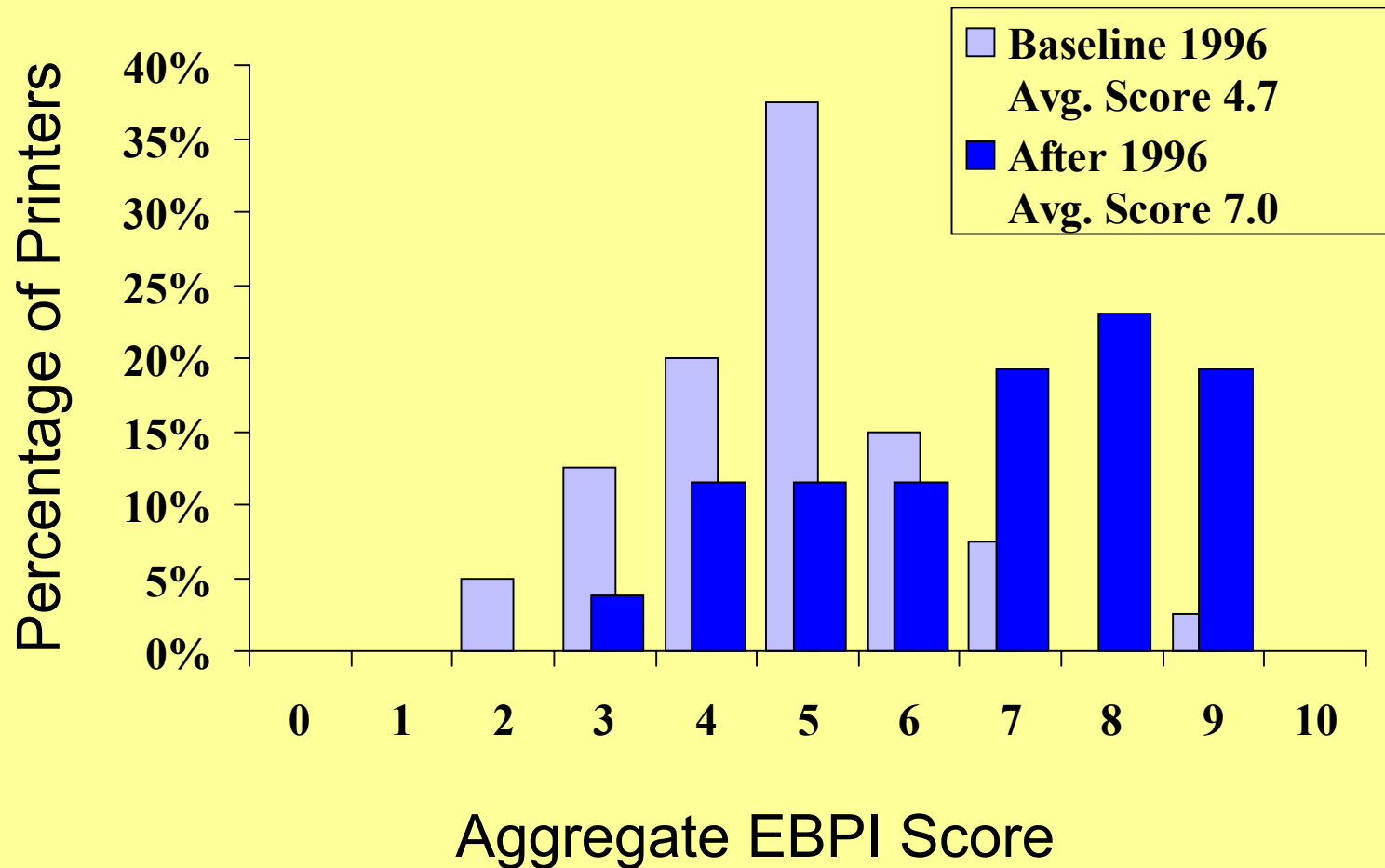
- * Are the fountain solutions used on offset web-fed lithographic presses alcohol-free? (air)
- * Printer meeting 2ppm or hauling? (water)
- * Is the facility in compliance with quantity and time limits for HW storage? (waste)

Beyond Compliance Indicators:

- * Does printer have a sign prohibiting discharge of process chemicals over sinks in work areas? (P2)
- * Does printer recycle aluminum printing plates? (P2)

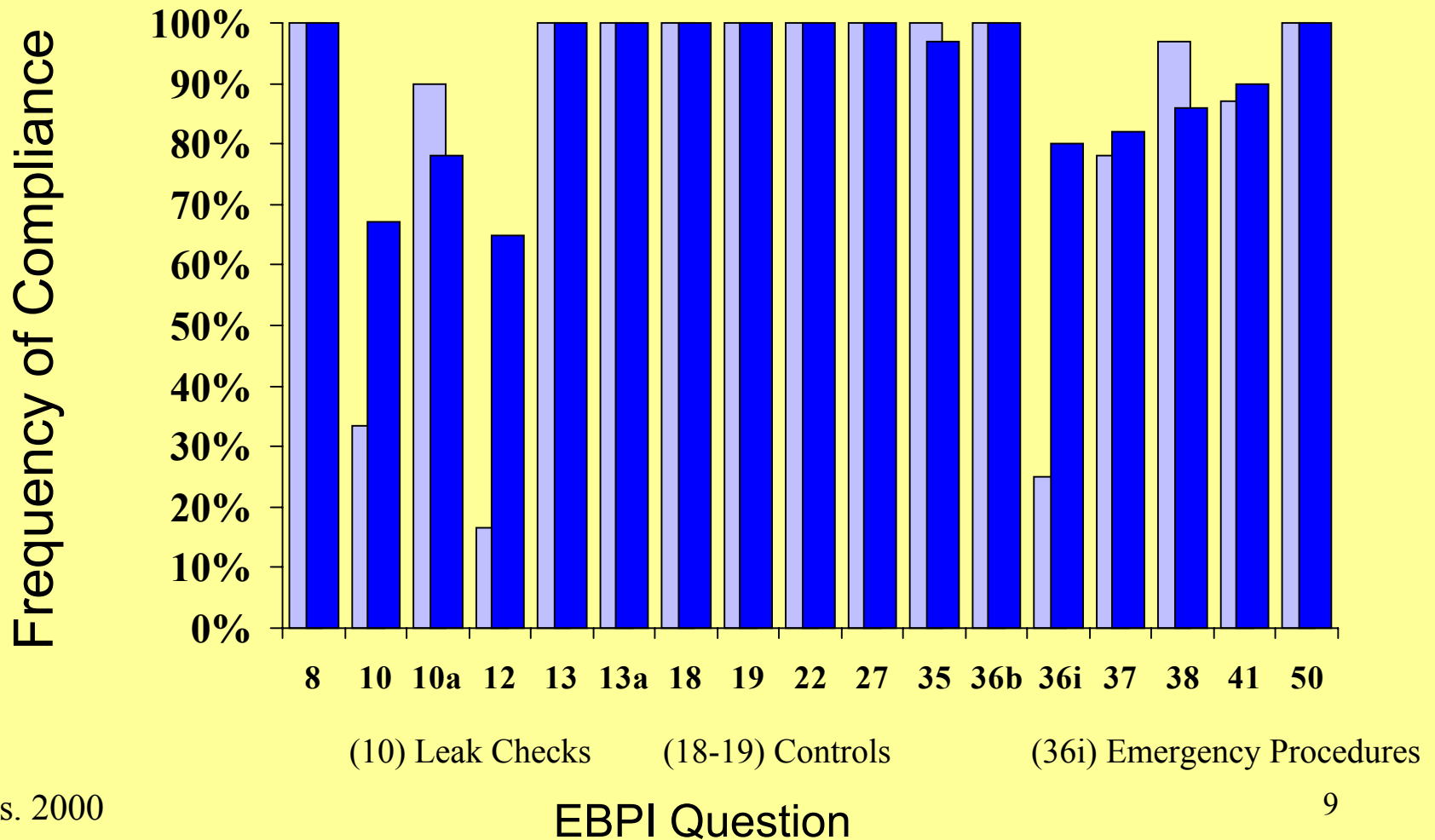
PRINTER'S PARTNERSHIP

Aggregate EBPI Analysis



Massachusetts Dry Cleaners

Individual EBPI Analysis



1997 vs. 2000

EBPI PERFORMANCE RESULTS

Dry Cleaner EBPI: Facility Has Emergency Procedures in Place

Performance increased **from 25%** at baseline **to 80%**.

Apply this change to the entire universe: **358** more facilities with emergency procedures in place.

Dry Cleaner EBPI: Containers in Good Cond. & Kept Closed

Performance decreased by **3%** from baseline (or roughly **20** more dry cleaners have inadequate container management).

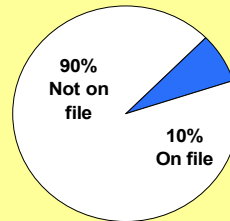
Photoprocess EBPI: Meeting 2ppm Silver Discharge

Performance increased **from 60%** at baseline **to 98%** in 1998. MA DEP can account for **98%** of all silver generated from photoprocessors in Massachusetts.

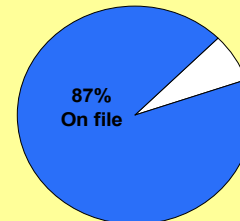
Examples of Early ERP Results

Percentage of MA dry cleaners "in the system"

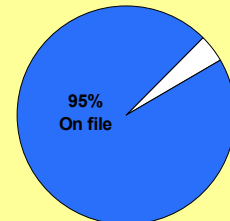
- Percent change in number of regulated facilities



BEFORE 1996



AFTER 1997



2000

- Percent change in compliance rates

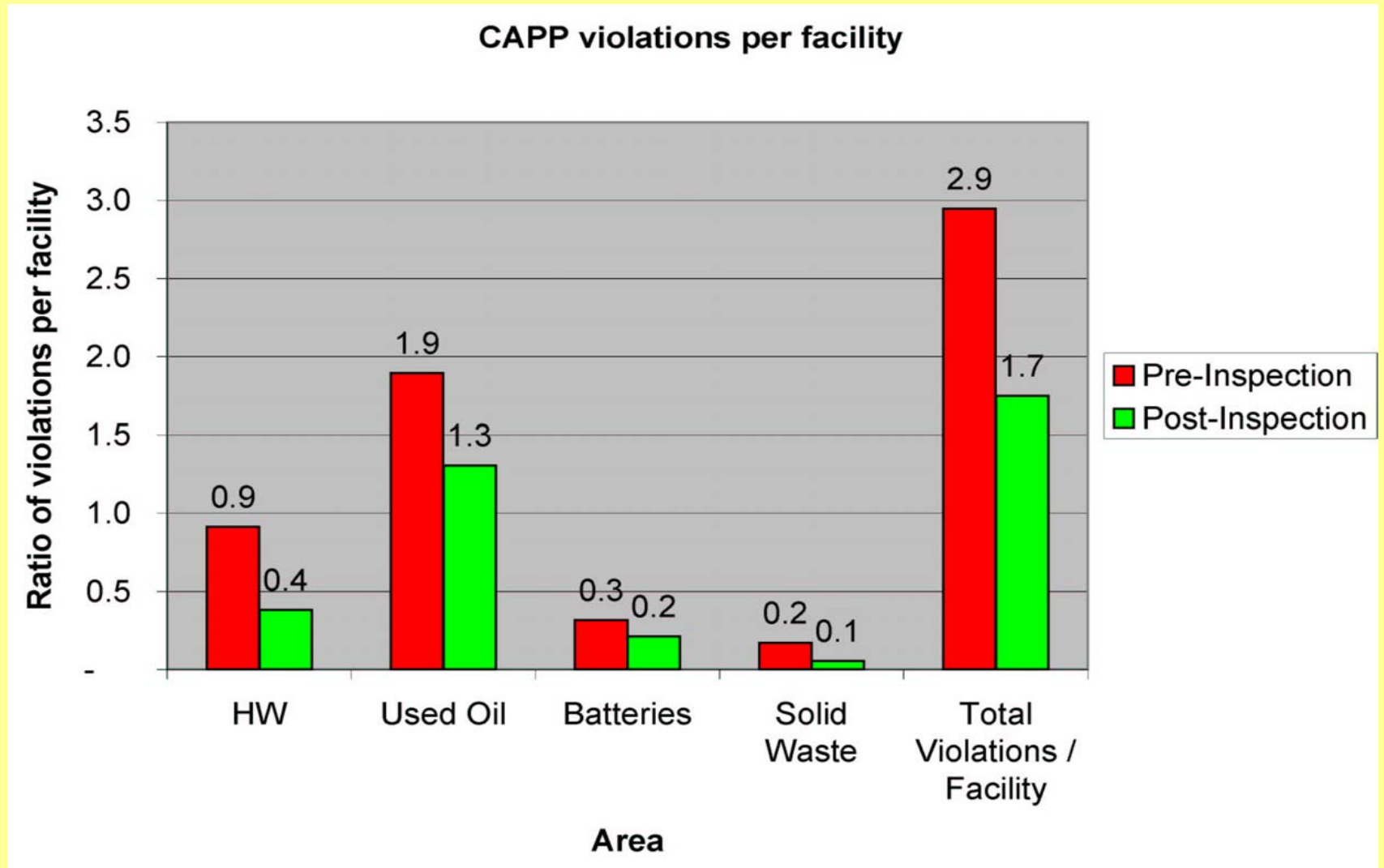
MA Return to Compliance submissions post-implementation
(decrease submission=increase in compliance)

Massachusetts	1997	1998	1999	2000
Dry Cleaners (660)	62	16	4	3
Photo Processors (550)	57	35	22	20
Printers (1300)	X	66	16	9

- Outcome measures

- MA Dry Cleaners:* Workbook weekly leak detection protocol
 - Result:** Performance increased from 33% at baseline in 1997 to 66% in 2000. Based on avg. perc use per facility, applied to entire universe, equivalent to **22.5 ton reduction** of perc emissions.
 - MA Printers:* Press cleanup solution compliance
 - Results:** Performance increased from 77% at baseline in 1998 to 85% in 1999. Apply this to entire universe, equivalent to **4.0 tons VOC reduction.**
 - FL Autobody Repair:* Reduced average number of violations 42 %, overall compliance rate increased by 42% between pre-and post-certification implementation.
 - RI Autobody Repair:* 50% compliance with voluntary program.

FL CAPP Violations per Facility



Why Implement ERP?

States Agencies

- Enhances and measures performance of facilities/whole business sectors
- Uses limited resources more efficiently
- Addresses cumulative impact of a large number of small sources
- More sustainable regulatory system

FL Inspector's Observations

“They thanked us for the workshops . . .”

“They were happy to have a workbook that really defines their role in environmental compliance.”

“If I only knew what to do, I would do it was answered. We found shops that were happy to have received regulations in plain English.”

“The shops talked a lot among themselves once the Workbooks were mailed.”

“Even though they may not have been in full compliance during post-inspections, they were much more aware of the requirements and the DEP, and were eager to demonstrate their compliance.”

Why Implement ERP?

Small Business

- Straightforward, plain language compliance assistance
- Certainty of responsibility/accountability
- Potential consolidated compliance reporting
- Level playing field
- Improved environmental awareness

FL Certifiers Comments

“We feel the CAPP program is a good idea. Many people in violation of procedures are doing so due to the lack of knowledge. This program provides detailed procedures which should answer any questions concerning the issues.”

“Some of my practices were below standard prior to this workbook. I have since implemented several things to improve my status. The workbook is very informative and easy to understand. Thanks.”

“I did the forms the best I could. Even with the workshop I did not completely understand a lot of the terms. I am a one man operation and keep a clean shop and dispose of waste properly.”

ERP Sectors/States

- **Autobody/Auto Repair**
 - Delaware
 - District of Columbia
 - Florida
 - Maryland
 - Rhode Island
 - Maine*
- **Auto salvage yards**
 - Florida
 - Maine
 - Rhode Island*
- **Dry Cleaners**
 - Massachusetts
 - Michigan*
- **Printers**
 - Massachusetts
 - Wisconsin*
- **Underground Storage Tanks**
 - Georgia
 - Rhode Island
 - Tennessee
- **Stage II Vapor Recovery**
 - Massachusetts
 - Rhode Island
- **Retail Gasoline Sales Sector**
 - Vermont
- **Implementing**
 - Massachusetts
 - Florida
 - Rhode Island
- **In Progress**
 - Maryland
 - District of Columbia
 - Tennessee
 - Delaware
- **Planning/Expansions**
 - Maine*
 - Rhode Island*
 - Massachusetts
 - Michigan*
 - Wisconsin*
 - Georgia
 - Vermont*

Why is the U.S. EPA Involved?

- ERP represents a great potential to improve environmental performance and benefit small businesses
- ERP presents partnership opportunities among co-regulators and businesses
- ERP offers state-to-state and state-to-local collaboration options

What ERP Assistance Can EPA Provide?

- State Innovation Grant Program
(www.epa.gov/innovation/stategrants)
- Project planning through contractor assistance
- Invitational travel support
- Technical document preparation
- Coordination among EPA Headquarters and Regional Offices

Where is ERP information?

- U.S. EPA Website: <http://epa.gov/permits>
- MA DEP Website: <http://www.mass.gov/dep/erp/>
- FL DEP Website:
<http://www.dep.state.fl.us/waste/categories/hazardous/pages/autocert.htm>
- RI DEM Website:
<http://www.state.ri.us/dem/programs/index.htm>

The Environmental Results Program (ERP)

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