

EPA Grant EI-96988501-0: 10/01/2006 to 09/30/2009
Quarterly Innovation Grant Report for APRIL to JUNE 2008

State Innovation Grant Program:
Arizona Department of Environmental Quality
Grant ID: EI-96988501-0

Project Title: Arizona Environmental Performance Track: Increasing Membership by Lowering Membership Hurdles, Building a Broader Base, and Improving Key Incentives.

Applicant: Arizona Department of Environmental Quality (ADEQ)

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Project Period: September 29, 2006 to September 28, 2009 (3 years)

Project Overview

This project is intended to broaden the range of business sectors involved in Arizona's newly formed Performance Track Program through both existing and new initiatives designed specifically for small business, small communities and agricultural enterprises. Arizona proposes to develop guidance and templates for Small Community Environmental Protection Plans (very similar to EMS's) under a new ADEQ policy that is based on EPA's recently modified Small Community Policy. The project will also create an agricultural performance track. Arizona will partner with air quality departments of Maricopa, Pima, and Pinal Counties who have EPA delegation to implement Title V of the Clean Air Act. The project proposes to significantly reduce one of the burdens of applying for membership in Arizona's program and PT by developing comprehensive EMS guidance and templates (meeting standards set by Performance Track) with plans to make them generally available to the regulated community. The project also proposes to further develop incentives which streamline the permitting process and reduce reporting obligations.

Section 1 – Summary of Activities

(Narrative text, short summary of grant activities that have taken place during the quarter)

ADEQ developed the [2008 Arizona Environmental Performance Track Members Survey](#) and distributed it to the existing Arizona Performance Track members to solicit their opinions and suggestions on the Arizona program and has scheduled it first [Arizona Environmental Performance Track Annual Members Conference for Wednesday, September 10, 2008](#). In addition to our members, ADEQ Division Directors and our participating Air Quality county partners have been invited to attend. Steve Owens, ADEQ Director, will be the featured speaker. ADEQ is also working to schedule a representative from EPA Region IX to participate in the member conference.

The final draft of the *Small Community Environmental Protection Plan (SCEPP) template* is now under management review for approval. The SCEPP template should be released early in the third quarter. Several small communities are now participating in the program and have begun a self-assessment of their communities using the questionnaires in [A Guide for Developing and Implementing a Small Community Environmental Protection Plan \(SCEPP\)](#). Several more small communities have notified ADEQ of their interest in participating in the program. In anticipation of the release of the SCEPP template, a PowerPoint presentation was developed to train the Community Liaisons on the SCEPP template. The three-hour training was conducted on June 23, 2008 so the Liaisons can provide guidance to participating small communities in the [Arizona's Small Community Environmental Compliance Assistance Program](#). Upon ADEQ management approval, the SCEPP template will be posted to the web page.

ADEQ is developing a communications procedure for notifying members via email of webinars and training opportunities.

A Strategy Meeting had been scheduled for the second quarter to determine interest in developing a Ptrack Agricultural component to Arizona's program. Due to scheduling conflicts ADEQ has elected to table this discussion until after the September 10, 2008 Member Conference.

ADEQ continues to work with our Air Quality Permits Section Manager on a memorandum for division approval to grant flexibility in Air Permitting to Performance Track members to provide immediate incentives that will not require changing current state statutes.

ADEQ continues to work with our Pollution Prevention Unit (P2) manager to develop and schedule a series of workshops to introduce and train the regulated community on using the four-module EMS template developed by our P2 staff.

Section 2 – Accomplishments/Problems

(Narrative text, short summary of performance to date, major milestones, problems that have occurred or expected, and steps to resolve problems)

Accomplishments:

ADEQ developed the 2008 Arizona Environmental Performance Track Members Survey and distributed it to the existing Arizona Performance Track members to solicit their opinions and suggestions on the Arizona program. The results of this survey will help improve the benefits and services for our members and will assist in the identification and development of new benefits. The responses will be tabulated and presented at the upcoming 2008 Arizona Environmental Performance Track Annual Members Conference to be held Wednesday, September 10, 2008. A panel discussion on topics of interest will be included in the program agenda.

The final draft of the *Small Community Environmental Protection Plan* (SCEPP) template is now under management review for final approval and should be released in the third-quarter 2008. Three-hour training was conducted on June 23, 2008 for the Community Liaisons so they can provide guidance to participating small communities in the [Arizona's Small Community Environmental Compliance Assistance Program](#).

ADEQ continues to participate in EPA monthly State Conference Calls and teleseminars, and continues to work with EPA to review new member applications, annual reports and renewal applications. Effective in the first quarter 2008, ADEQ is now inviting other staff to participate in Ptrack teleseminars of interest to their specific programs.

Problems:

Region IX has completed its review of the MOA, and the draft MOA is now under review by EPA Headquarters.

Section 3 – Schedules

(Compare completed milestones against agreed project schedule, explain discrepancies)

NOTE: ADEQ has added new dates in **Blue** font which reflects revised dates in the Workplan/Project Schedule to meet the three-year Grant dates beginning October 1, 2006 and ending September 30, 2009.

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Key Activities, Milestones and Outcomes

| Task - Description | Start | End | Current Status/Outcome |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| General | | | |
| Develop Quality Assurance Project Plan with performance measures (to be modified continuously as additional performance measures are identified) | 60 days after project approval | | ADEQ is awaiting management comments on the draft <u>Quality Assurance Project Plan (QAPP)</u> for this grant. Once approval is received, ADEQ intends to make use of Larry Woods' offer for EPA's contractor to review and comment on the draft QAPP. |
| Submit Revised Workplan for EPA Approval | 60 days after project approval | | Unknown |
| Finalize MOA between ADEQ, EPA, and the air quality departments of Maricopa, Pima, and Pinal Counties regarding Arizona Environmental Performance Track | 03/06 10/06 | 06/06 01/07 | Region IX has completed its review of the MOA, and the draft MOA is now under review by EPA Headquarters. As part of the negotiation process, ADEQ revised its Performance Track Program Description and updated its web page with the revised version. Once the MOA is finalized, ADEQ can enter into discussions on an MOA with the county air quality departments. |
| Adoption of federal performance track incentives for MACT. | 03/06 10/06 | 04/07 11/07 | <u>Air Quality Division MACT Rule:</u> In February, the Ptrack Administrator sent a memorandum to the Air Quality Section Manager requesting a review and comments on the MACT rule and proposed Ptrack incentives. |
| Quarterly review and report to EPA on the project status. | 06/06 01/07 | 04/09 09/09 | All Quarterly Reports including Financial are up-to-date and filed with EPA. |

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| Annual member, partnership and agency staff survey followed by an annual conference with Performance Track members and collaborative partnership agencies and trade associations to evaluate the effectiveness of the program and discuss future incentives designed to benefit existing and future members and to encourage mentoring programs | 09/06 10/06 | 09/08 04/09 | ADEQ developed the 2008 Arizona Environmental Performance Track Members Survey and distributed it to the existing Arizona Performance Track members to solicit their opinions and suggestions on the Arizona program. The results of this survey will help improve the benefits and services for our members and will assist in the identification and development of new benefits. The responses will be tabulated and presented at the upcoming 2008 <u>Arizona Environmental Performance Track Annual Members Conference</u> to be held Wednesday, September 10, 2008. |
| Develop and track quarterly performance measures for Performance Track. | 03/06 10/06 | 04/09 09/09 | ADEQ has developed performance measures within the context of the <u>Quality Assurance Project Plan</u> (QAPP) for this grant and is awaiting management review and comments. Upon ADEQ management approval, ADEQ intends to make use of Larry Woods' offer for EPA's contractor to review and comment on the draft QAPP. |
| Review with EPA all National and Arizona Environmental Performance Track applications and current members' annual reports. | 03/06 10/06 | 04/09 09/09 | Ongoing Commitment: We continue to participate in this process. |
| Participate in EPA Performance Track weekly (monthly) state conference calls and national and regional Performance Track conferences | 03/06 10/06 | 04/09 09/09 | Ongoing Commitment: We continue to participate in the State conference calls and special teleseminars. Effective in the first quarter 2008, ADEQ is now inviting other staff to participate in Ptrack teleseminars of interest to their specific programs. |

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| <p>Ongoing public outreach on performance track through speaking engagements at seminars</p> | <p>03/06 10/06</p> | <p>03/09 09/09</p> | <p>External Outreach Presentations <u>April 9, 2008</u> – RCRA Seminar at ASU <u>April 18, 2008</u> – American Public Works Association (APWA) EMS Training Workshop <u>June 25, 2008</u> – RCRA Seminar at ASU</p> <p>Internal Outreach Presentations June 23, 2008: Training for the ADEQ Community Liaisons on the SCEPP template.</p> <p>Ongoing Internal Outreach: Continued communication and program support for ADEQ’s Community Liaisons who have the lead on the ADEQ <i>Small Community Compliance Assistance Program</i>. The ADEQ Ptrack program has the lead on development of the SCEPP template. The final draft of the SCEPP template is under management review.</p> |

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| <p>Conduct training for all agency enforcement staff on requiring the development of an EMS as part of a Compliance Schedule when negotiating Consent Orders and Judgments when appropriate including sample text utilizing the four EMS templates as a guidance resource.</p> | <p>03/06 10/06</p> | <p>03/09 09/09</p> | <p>Ahead of schedule.</p> <p>New Guidance Posted to AZ Ptrack Website 1st Quarter 2008:</p> <p>PowerPoint presentation explaining the <i>Small Communities Environmental Compliance Assistance Program</i> is now posted to our website at http://www.azdeq.gov/function/compliance/download/Final_SCEPP_Presentation-02-20-08.pdf</p> <p>Completed in the 4th Quarter 2007 http://www.azdeq.gov/function/about/track.html Links to ADEQ developed EMS Templates and Ptrack staff developed A Guide for Developing and Implementing a Small Community Environmental Protection Plan (SCEPP) guidance now posted for easy access by staff and the regulated community.</p> |

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| <p>Enhance the ADEQ Performance Track Web Page by providing “one-stop” access to the National and Arizona Environmental Performance Track programs and incentives; recognize and profile members and their continuous improvement projects; provide direct links to current members; guidance documents and resources to encourage and promote Performance Track membership supplemented by ongoing public education and outreach.</p> | <p>06/06 01/07</p> | <p>10/06 5/08</p> | <p>ADEQ is working with our Communication’s Office on a complete redesign of our Ptrack website which should be unveiled in the 3rd quarter 2008, focusing on the incentives that are available to Performance Track members. The AZ Ptrack Brochure will also be revised to list all incentives approved to date.</p> <p>ADEQ continues to improve our webpage at http://www.azdeq.gov/function/about/track.html</p> <p>The draft SCEPP template is awaiting management approval.</p> <p>Completed in the 4th Quarter 2007 we added links to our new ADEQ <i>Four Module EMS Templates</i> at http://www.azdeq.gov/environ/waste/p2/index.html and the <i>new Small Community</i> guidance A Guide for Developing and Implementing a Small Community Environmental Protection Plan (SCEPP)</p> |
| <p>Conduct annual site visits of a minimum of 10% of Arizona Performance Track member facilities.</p> | <p>03/06 10/06</p> | <p>03/09 9/09</p> | <p>ADEQ has found an <u>EMS Lead Auditor Training</u> opportunity being conducted in Phoenix in November, 2008. ADEQ needs to verify with EPA that this training course will satisfy the Site Visit Training requirements.</p> |
| <p>EMS Guidance and Templates</p> | | | |

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|-----------------------------------------------------------------------------|-----------------------|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Review existing ADEQ developed EMS guidance and templates | 09/06 10/06 | 11/06 11/06 | Project Completed 4th Quarter 2007: ADEQ's <i>Four Module EMS template</i> is now posted on the ADEQ website at http://www.azdeq.gov/environ/waste/p2/index.html with a link from our AZ Ptrack web page. |
| Develop EMS survey to be distributed to small businesses during inspections | 9/06 4/07 | 11/06 6/07 | The P2 staff member with whom the Ptrack Administrator was working in developing an EMS Survey has retired and is no longer with ADEQ. State budget constraints and a hiring freeze will not permit filling the staff position at this time. The Ptrack Administrator and P2 Manager are exploring other options for accomplishing this task. ADEQ hopes to complete the survey during the third quarter as planned. |
| Conduct training of ADEQ inspectors on EMS's and use of the survey | 12/06 7/07 | 01/06 8/07 | The P2 staff member with whom the Ptrack Administrator was working in developing an EMS Survey has retired and is no longer with ADEQ. State budget constraints and a hiring freeze will not permit filling the staff position at this time. The Ptrack Administrator and P2 Manager are exploring other options for accomplishing this task. ADEQ hopes to complete the survey during the third quarter as planned and schedule staff training. |

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| Distribute EMS surveys during inspections | 1/06 8/07 | 12/06 7/08 | <p>The P2 staff member with whom the Ptrack Administrator was working in developing an EMS Survey has retired and is no longer with ADEQ. State budget constraints and a hiring freeze will not permit filling the staff position at this time.</p> <p>The Ptrack Administrator and P2 Manager are exploring other options for accomplishing this task.</p> <p>ADEQ hopes to complete the survey during the third quarter as planned and schedule staff training so inspectors can begin distributing the surveys no later than the beginning of the third quarter of 2008.</p> |

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| <p>Hold two meetings with small businesses regarding EMS's to gauge interest in EMS's and discuss ADEQ's EMS guidance development</p> | <p>1/06 9/06</p> | <p>06/06 1/07</p> | <p>Ongoing Commitment:</p> <p>External Outreach Presentations <u>April 9, 2008</u> – RCRA Seminar at ASU <u>April 18, 2008</u> – American Public Works Association (APWA) EMS Training Workshop <u>June 25, 2008</u> – RCRA Seminar at ASU</p> <p>Internal Outreach Presentations June 23, 2008: Training for the ADEQ Community Liaisons on the draft SCEPP template.</p> <p>Ongoing Internal Outreach: Continued communication and program support for ADEQ's Community Liaisons who have the lead on the ADEQ <i>Small Community Compliance Assistance Program</i>. The ADEQ Ptrack program has the lead on development of the SCEPP template. The final draft of the SCEPP template is under management review.</p> |
| <p>Modify EMS guidance to meet standards set by EPA's National Performance Track program</p> | <p>12/06 7/07</p> | <p>04/07 11/07</p> | <p>ADEQ staff is providing one-on-one assistance to the regulated community in developing an EMS using ADEQ's Four Module EMS Template which is now posted on the ADEQ Ptrack website at http://www.azdeq.gov/environ/waste/p2/index.html with a link from our AZ Ptrack web page.</p> |

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|--------------------------------------------------------|-----------------------|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Modify EMS templates to meet EPA's standards as needed | 04/07 07/07 | 06/07 1/08 | <p>Projects Completed in 2nd Quarter 2008: 1) Final draft of SCEPP template is completed (less "robust" EMS) and is under management review for final approval.</p> <p>Projects Completed in 1st Quarter 2008: 1) The PowerPoint for Arizona's Small Community Environmental Compliance Assistance Program has been completed and posted to our website. Posted to our website at http://www.azdeq.gov/function/compliance/download/Final_SCEPP_Presentation-02-20-08.pdf.</p> 2) First draft revisions of the <i>Small Community Environmental Protection Plan</i> (SCEPP) template are nearing completion and should be ready for management review in the 2nd quarter of 2008. <p>Two Projects Completed in 4th Quarter 2007: Both have been posted to our ADEQ Ptrack website with links on our AZ Ptrack web page. 1) ADEQ Four Module EMS Templates 2) A Guide for Developing and Implementing a Small Community Environmental Protection Plan (SCEPP).</p> |

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| <p>Post revised guidance and templates on ADEQ Performance Track web page</p> | <p>06/07 1/08</p> | <p>09/07 4/08</p> | <p>Projects Completed in 2nd Quarter 2008: 1) Awaiting management approval on the final draft of SCEPP template (less "robust" EMS). Should be posted to web page early 3rd quarter 2008.</p> <p>Projects Completed in 1st Quarter 2008: 1) The PowerPoint for Arizona's Small Community Environmental Compliance Assistance Program has been completed and posted to our website. Posted to our website at http://www.azdeq.gov/function/compliance/download/Final_SCEPP_Presentation-02-20-08.pdf.</p> <p>2) First draft revisions of the <i>Small Community Environmental Protection Plan</i> (SCEPP) template are nearing completion and should be ready for management review in the 2nd quarter of 2008. Upon approval, this too will be posted to our webpage.</p> <p>Two Projects Completed in 4th Quarter 2007: Both have been posted to our ADEQ Ptrack website with links on our AZ Ptrack web page. 1) ADEQ Four Module EMS Templates 2) A Guide for Developing and Implementing a Small Community Environmental Protection Plan (SCEPP).</p> |
| <p>Revise Performance Track application and written literature to reflect web availability</p> | <p>09/07 04/08</p> | <p>12/07 07/08</p> | <p>ADEQ is working with our database staff and has converted our Ptrack application to MS Word format. Draft revisions to the Ptrack application and to the redesigned Ptrack web page will add more details on program incentives. Once completed, we will coordinate with EPA to link our revised application to the National EPA application process.</p> |

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| <p>Hold three meetings/training sessions with small businesses to explain EMS guidance and templates</p> | <p>09/07 04/08</p> | <p>12/07 07/08</p> | <p><u>Ongoing Commitment:</u></p> <p>External Outreach Presentations <u>April 9, 2008</u> – RCRA Seminar at ASU <u>April 18, 2008</u> – American Public Works Association (APWA) EMS Training Workshop <u>June 25, 2008</u> – RCRA Seminar at ASU</p> <p>External Outreach ADEQ is actively participating in the Arizona Environmental Strategic Alliance's (AESAs) efforts to develop and offer EMS related training and mentorship opportunities.</p> <p>ADEQ staff is providing one-on-one assistance to the regulated community in developing an EMS using ADEQ's Four Module EMS Template which is now posted on the ADEQ Ptrack website at http://www.azdeq.gov/viron/waste/p2/index.html with a link from our AZ Ptrack web page.</p> <p>Internal Outreach Presentations June 23, 2008: Training for the ADEQ Community Liaisons on the draft SCEPP template.</p> <p>Ongoing Internal Outreach:</p> <p>Continued communication and program support for ADEQ's Community Liaisons who have the lead on the ADEQ <i>Small Community Compliance Assistance Program</i>. The ADEQ Ptrack program has the lead on development of the SCEPP template. The final draft of the SCEPP template is under management review.</p> |

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| Agriculture Performance Track | | | |
| <p>Hold three meetings with members of the agricultural community and other state and federal agencies to discuss applicability of the existing Performance Track program to agricultural operations</p> | <p>01/07 8/07</p> | <p>04/07 11/07</p> | <p>Early conversations between the Agricultural community and ADEQ Director Steve Owens showed minimal interest by the Agricultural community in pursuing an Arizona Performance Track program. ADEQ will attempt to reestablish communication with the Agricultural community to see if new found interest exists.</p> <p>Due to scheduling conflicts our 2nd quarter Strategy Meeting had to be rescheduled. ADEQ has elected to table this discussion on after the September 10, 2008 Member Conference.</p> <p>In addition, ADEQ continues to work with our P2 staff on other incentive programs to promote environmental stewardship.</p> |
| <p>Modify existing program or explore options for new comparable program based on input received in open meeting</p> | <p>02/07 09/07</p> | <p>09/07 04/08</p> | <p>Although early conversations between the Agricultural community and ADEQ Director Steve Owens showed minimal interest by the Agricultural community in pursuing an Arizona Performance Track program.</p> <p>ADEQ will schedule a Strategy Meeting after the September 10, 2008 Member Conference to determine interest in developing a Ptrack Agricultural component to Arizona's program.</p> <p>ADEQ is working with our P2 staff on other incentive programs to promote environmental stewardship.</p> |
| <p>Develop guidance documents for agricultural program</p> | <p>09/07 4/08</p> | <p>11/07 6/08</p> | <p>If support for a program is received from the Agricultural community and/or P2, ADEQ will compile the information gathered into guidance documents in support of an Agricultural component to our Arizona Ptrack program.</p> |

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| Post program description/guidance on ADEQ Performance Track web page | 12/07 7/08 | 02/07 9/08 | If support for a program is received from the Agricultural community and/or P2, ADEQ will compile the information gathered into guidance documents in support of an Agricultural component to our Arizona Ptrack program. ADEQ will post all guidance on our Ptrack website. |
| Improvements to Flexibility in Permits and Reduced Reporting Incentives | | | |
| Develop list of contacts of other state agencies that regulate facilities eligible for Performance Track | 07/06 2/07 | 08/07 3/07 | ADEQ has identified seven Arizona agencies that regulate facilities eligible for Performance Track. ADEQ will meet with each agency to discuss the Ptrack program and attempt to gain a commitment for developing incentives and on partnering with ADEQ and the participating Counties. |
| Review <i>EPA White Paper #3 on the Design of Flexible Air Permits</i> to further develop Arizona's flexibility in permits as an incentive | 08/07 03/08 | 09/07 04/08 | ADEQ's Air Quality Permits Section Manager is drafting a memorandum for division approval to grant Performance Track member's flexibility in Air Permitting which upon approval should provide immediate incentives that will not require changing current state statutes. These new incentives will be added to our program webpage. |
| Meet with state agency representatives to discuss Performance Track, permit flexibility, and reduced reporting incentives | 09/07 4/08 | 10/07 5/08 | ADEQ has identified seven Arizona agencies that regulate facilities eligible for Performance Track. ADEQ will meet with each agency to discuss the PT Program and attempt to gain a commitment for developing incentives and on partnering with ADEQ and the participating Counties. |

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| Develop additional requirements needed to receive multi-agency incentives | 11/07 6/08 | 03/08 10/08 | ADEQ has identified seven Arizona agencies that regulate facilities eligible for Performance Track. ADEQ will meet with each agency to discuss the PT Program and attempt to gain a commitment for developing incentives and on partnering with ADEQ and the participating Counties. |
| Post additional agencies offering incentives on ADEQ Performance Track web page | 04/08 11/08 | 06/08 1/09 | ADEQ will include all approved incentives in the new redesigned Ptrack website. |
| Draft external guidance on permit flexibility and reduced reporting incentives | 04/08 11/08 | 08/08 3/09 | Awaiting ADEQ Air Quality Division approval of proposed incentives for Ptrack members. Once approved, EPA and AZ Ptrack members will be notified and guidance developed. |
| Post external guidance on ADEQ Performance Track web page | 09/08 4/09 | 12/08 7/09 | Awaiting ADEQ Air Quality Division approval of proposed incentives for Ptrack member. Once approved, the incentives will be added to our redesigned webpage and guidance developed and posted. |
| Revise application and other written literature to reflect web availability of guidance on permit flexibility and reduced reporting incentives | 01/09 8/09 | 03/09 9/09 | Draft revisions to the Ptrack application, the redesigned Ptrack web page and program brochure will add details on all program incentives. Once completed, we will coordinate with EPA to link our revised application to the National EPA application process. |

Section 4 - Financial Report

Confidential business information removed by EPA.

Section 5 - Estimates

(Narrative, estimate of time and funds necessary to complete the project compared to time and funds remaining)

ADEQ continues to work within the approved annual funding plan for this grant.

Attachment

Reporting Requirements

1. ADEQ will submit Quarterly Progress Reports. (The Quarterly Progress Reports will include: a comparison of accomplishments with workplan objectives, identification of cost overruns, reasons for slippage in project schedule (if applicable), and itemized costs for travel and supplies.)
2. Detailed follow-up Case-Study Report that will be prepared and submitted at the end of the grant period. (The case study report will include: a summary of the project, reductions achieved (if applicable), a cost analysis, any problems encountered, successes achieved, and lessons learned.)

Environmental Outcomes and Performance Measures

Environmental Management System Development Guidance and Templates

- ADEQ will survey small businesses and small communities during routine inspections to determine their knowledge of, and interest in, EMS's.
- ADEQ will meet with those small businesses and small communities having an interest in EMS's to identify how guidance and templates might increase the likelihood of developing an EMS.
- Further develop the existing EMS guidance and templates.
- ADEQ will make guidance and templates available on ADEQ's web page devoted to Performance Track.
- Increase membership in Arizona Performance
- Measure quantified pollution reductions of members.

Agriculture Performance Track

- Invite appropriate members of the agricultural community, along with other state and federal agencies (e.g., Arizona Department of Agriculture and EPA), to participate in an open dialogue about the existing Performance Track program and whether it is applicable to agricultural operations in Arizona.
- Discuss with the group what modifications to the program might increase the likelihood of participation
- Explore a new program better suited to agricultural operations while still meeting the spirit and intent of Performance Track.

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- Program description will be available on ADEQ's web page.
- ADEQ will track the number of participants along with the quantifiable environmental improvement projects of its members.

Improvements to Permitting Flexibility and Reduced Reporting Incentives

- ADEQ will contact other state agencies which regulate facilities eligible for performance track (e.g., Arizona Department of Water Resources).
- ADEQ will meet with these agencies to discuss the benefits and goals of Environmental Performance Track and explore permit flexibility or reporting incentives that might be offered by the other State agencies.
- Develop additional requirements needed to receive the benefits.
- Incentives will be posted on ADEQ's web page and included in Arizona's Performance Track application and associated literature.
- Development of external guidance on the permit flexibility and reduced reporting incentives
- Engage the assistance of the group which helped ADEQ in the development of the Arizona program.
- Improve the permitting flexibility and reporting reduced reporting incentives
- Asking applicants why they applied, and whether the new guidance on these incentives played a role in their decision.
- Measure results of the quantified environmental improvement project as a success of the incentive improvements.