INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

May 26, 2006

Mr. Bharat Mathur
Acting Regional Administrator, Region 5
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

ATTN: ACQUISITION AND ASSISTANCE BRANCH (MCG-10J)

Re: Indiana Environmental Results Program-Auto Salvage
USEPA-AO-OPEI-05-01

Dear Mr. Mathur:

The Indiana Department of Environmental Management (IDEM) is pleased to submit our final application for the State Innovation Grant Program. IDEM is requesting $215,115 in new Federal funds to develop and implement an Environmental Results Program (ERP) for the Auto Salvage Sector. The state will provide an in-kind match of $18,657 for a total budget of $233,772 for this project. We are requesting a project and budget period of 10/1/2006 – 9/30/2009.

If you have any questions regarding this matter, please contact Michael P. Mendyk, Grants Director at (317) 233-8850 or Denise Shelby, Grants and Finance Manager at (317) 234-0302.

Sincerely,

Scott J. Nally
Assistant Commissioner
External Affairs

Enclosures
DS:SJN:ds
cc: Marilou Martin-U.S. EPA
George Stone-U.S. EPA
Sherri Walker-U.S. EPA HQ

APPLICATION FOR FEDERAL ASSISTANCE

Version 7/03

1. TYPE OF SUBMISSION: Application ☐ Construction ☑ Non-Construction	Pre-application ☐ Construction ☐ Non-Construction	**2. DATE SUBMITTED**	Applicant Identifier
		3. DATE RECEIVED BY STATE	State Application Identifier
		4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier USEPA-AO-OPEI-05-01

5. APPLICANT INFORMATION

Legal Name: Indiana Department of Environmental Management	**Organizational Unit:** Department: Office of External Affairs
Organizational DUNS: 82-479-9271	Division: Office of Planning and Assessment / Grants
Address: Street: 100 N. Senate Avenue	**Name and telephone number of person to be contacted on matters involving this application (give area code)** Prefix: Mr. / First Name: Michael
City: Indianapolis	Middle Name P.
County: Marion	Last Name Mendyk
State: Indiana / Zip Code 46204	Suffix:
Country: United States of America	Email: mmendyk@IDEM.in.gov
6. EMPLOYER IDENTIFICATION NUMBER *(EIN)*: 3 5 - 6 0 0 0 1 5 8	Phone Number (give area code) (317) 233-8850 / Fax Number (give area code) (317) 233-6647
8. TYPE OF APPLICATION: ☑ New ☐ Continuation ☐ Revision. If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) ☐ ☐ Other (specify)	**7. TYPE OF APPLICANT:** (See back of form for Application Types) A State Other (specify)
	9. NAME OF FEDERAL AGENCY: United States Environmental Protection Agency
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 6 6 - 9 4 0 TITLE (Name of Program): Environmental Policy and Innovation Grants	**11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:** Indiana Environmental Results Program - Auto Salvage Sector
12. AREAS AFFECTED BY PROJECT *(Cities, Counties, States, etc.)*: Statewide	
13. PROPOSED PROJECT Start Date: 10/1/2006 / Ending Date: 9/30/2009	**14. CONGRESSIONAL DISTRICTS OF:** a. Applicant Seventh / b. Project Statewide

15. ESTIMATED FUNDING:		**16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?**
a. Federal	$ 215,115 .00	a. Yes. ☐ THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE:
b. Applicant	$ .00	
c. State	$ .00	
d. Local	$ .00	b. No. ☑ PROGRAM IS NOT COVERED BY E. O. 12372
e. Other	$ 18,657 .00	☐ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW
f. Program Income	$ .00	**17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?**
g. TOTAL	$ 233,772 .00	☐ Yes If "Yes" attach an explanation. ☑ No

18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.

a. Authorized Representative		
Prefix Mr.	First Name Scott	Middle Name J.
Last Name Nally		Suffix
b. Title Assistant Commissioner External Affairs		c. Telephone Number (give area code) (317) 233-5965
d. Signature of Authorized Representative		e. Date Signed 5/26/06

INSTRUCTIONS FOR THE SF-424

Public reporting burden for this collection of information is estimated to average 45 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0043), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

This is a standard form used by applicants as a required face sheet for pre-applications and applications submitted for Federal assistance. It will be used by Federal agencies to obtain applicant certification that States which have established a review and comment procedure in response to Executive Order 12372 and have selected the program to be included in their process, have been given an opportunity to review the applicant's submission.

Item:	Entry:	Item:	Entry:
1.	Select Type of Submission.	11.	Enter a brief descriptive title of the project. If more than one program is involved, you should append an explanation on a separate sheet. If appropriate (e.g., construction or real property projects), attach a map showing project location. For preapplications, use a separate sheet to provide a summary description of this project.
2.	Date application submitted to Federal agency (or State if applicable) and applicant's control number (if applicable).	12.	List only the largest political entities affected (e.g., State, counties, cities).
3.	State use only (if applicable).	13	Enter the proposed start date and end date of the project.
4.	Enter Date Received by Federal Agency Federal identifier number: If this application is a continuation or revision to an existing award, enter the present Federal Identifier number. If for a new project, leave blank.	14.	List the applicant's Congressional District and any District(s) affected by the program or project
5.	Enter legal name of applicant, name of primary organizational unit (including division, if applicable), which will undertake the assistance activity, enter the organization's DUNS number (received from Dun and Bradstreet), enter the complete address of the applicant (including country), and name, telephone number, e-mail and fax of the person to contact on matters related to this application.	15	Amount requested or to be contributed during the first funding/budget period by each contributor. Value of in kind contributions should be included on appropriate lines as applicable. If the action will result in a dollar change to an existing award, indicate only the amount of the change. For decreases, enclose the amounts in parentheses. If both basic and supplemental amounts are included, show breakdown on an attached sheet. For multiple program funding, use totals and show breakdown using same categories as item 15.
6.	Enter Employer Identification Number (EIN) as assigned by the Internal Revenue Service.	16.	Applicants should contact the State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the State intergovernmental review process.
7.	Select the appropriate letter in the space provided. A. State B. County C. Municipal D. Township E. Interstate F. Intermunicipal G. Special District H. Independent School District I. State Controlled Institution of Higher Learning J. Private University K. Indian Tribe L. Individual M. Profit Organization N. Other (Specify) O. Not for Profit Organization	17.	This question applies to the applicant organization, not the person who signs as the authorized representative. Categories of debt include delinquent audit disallowances, loans and taxes.
8.	Select the type from the following list: • "New" means a new assistance award. • "Continuation" means an extension for an additional funding/budget period for a project with a projected completion date. • "Revision" means any change in the Federal Government's financial obligation or contingent liability from an existing obligation. If a revision enter the appropriate letter: A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration	18	To be signed by the authorized representative of the applicant. A copy of the governing body's authorization for you to sign this application as official representative must be on file in the applicant's office. (Certain Federal agencies may require that this authorization be submitted as part of the application.)
9.	Name of Federal agency from which assistance is being requested with this application.		
10.	Use the Catalog of Federal Domestic Assistance number and title of the program under which assistance is requested.		

BUDGET INFORMATION - Non-Construction Programs

OMB Approval No. 0348-0044

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Auto Salvage Innov.	66-940	$	$	$ 215,115.00	$ 18,657.00	$ 233,772.00
2.						0.00
3.						0.00
4.						0.00
5. Totals		$ 0.00	$ 0.00	$ 215,115.00	$ 18,657.00	$ 233,772.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total
	(1) Auto Salvage-Fed $	(2) Auto Salvage-In-Kind	(3)	(4)	(5)
a. Personnel	$ 68,749.00	$ 13,619.00	$	$	$ 82,368.00
b. Fringe Benefits	23,292.00	5,038.00			28,330.00
c. Travel	5,004.00				5,004.00
d. Equipment	28,664.00				28,664.00
e. Supplies	2,280.00				2,280.00
f. Contractual	42,500.00				42,500.00
g. Construction	0.00				0.00
h. Other	31,400.00				31,400.00
i. Total Direct Charges *(sum of 6a-6h)*	201,889.00	18,657.00	0.00	0.00	220,546.00
j. Indirect Charges	13,226.00				13,226.00
k. TOTALS *(sum of 6i and 6j)*	$ 215,115.00	$ 18,657.00	$ 0.00	$ 0.00	$ 233,772.00
7. Program Income	$	$	$	$	$ 0.00

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Standard Form 424A (Rev. 7-97)
Prescribed by OMB Circular A-102

Previous Edition Usable

SECTION C - NON-FEDERAL RESOURCES				
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8.	$	$	$	$ 0.00
9.				0.00
10.				0.00
11.				0.00
12. TOTAL *(sum of lines 8-11)*	$ 0.00	$ 0.00	$ 0.00	$ 0.00

SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	$ 0.00	$	$	$	$
14. Non-Federal	0.00				
15. TOTAL *(sum of lines 13 and 14)*	$ 0.00	$ 0.00	$ 0.00	$ 0.00	$ 0.00

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
(a) Grant Program	FUTURE FUNDING PERIODS (Years)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16.	$	$	$	$
17.				
18.				
19.				
20. TOTAL *(sum of lines 16-19)*	$ 0.00	$ 0.00	$ 0.00	$ 0.00

SECTION F - OTHER BUDGET INFORMATION	
21. Direct Charges:	22. Indirect Charges: (Salary+Fringe) x 14.37%
23. Remarks:	

Project Narrative Statement

STATE INNOVATION GRANT PROGRAM (SIG)

A. PROJECT TITLE: INDIANA ENVIRONMENTAL RESULTS PROGRAM – AUTO SALVAGE SECTOR

B. APPLICANT INFORMATION:

Applicant Name:

Indiana Department of Environmental Management (IDEM)
Office of Land Quality (OLQ)
Office of Pollution Prevention and Technical Assistance (OPPTA)
100 North Senate Avenue
Indianapolis, IN 46204 – 2251

Project Lead Contact in IDEM OLQ:
Rosemary Cantwell, Chief, Industrial Waste Compliance
E-mail: rcantwel@idem.IN.gov
Telephone: (317) 308-3003
Fax: (317) 308-3063

Project Contact Supported by:
Sandra Elyusuf, Compliance and Technical Assistance Program
E-mail: selyusuf@idem.IN.gov
Telephone: (317) 232-8578
Fax: (317) 233-5627

Geographic Focus: Indiana – Statewide

C. FUNDING REQUESTED: The Indiana Department of Environmental Management (IDEM) is requesting $215,115 from the U.S. Environmental Protection Agency to develop and implement an Environmental Results Program (ERP) for the Auto Salvage Sector.

D. PROJECT PERIOD: The project period is effective immediately upon receiving the U.S. EPA Date of Approval through three years after that date. (Approximately September 2006 through September 2009). However, some developmental aspects of the (ERP) began May 2005.

E. PROJECT NARRATIVE/WORK PLAN:

Background:

The pilot project will use the EPA's Environmental Results Program (ERP) model to attempt to achieve a measurable improvement in compliance with the auto salvage sector thereby reducing or eliminating the amount of pollution and harmful contaminants released into the air, land and water from auto salvage facilities through improved compliance and the incorporation of best management practices.

Historically, the auto salvage sector as a whole had not been addressed by IDEM. The only investigations that were conducted at these sites were the result of a complaint. Even then, the agency's response to the complaint was as varied as the nature of each complaint. However, even our historically limited evaluations have shown significant violations and significant impacts to the air, land, and water and that these problems are not mutually exclusive.

With this grant, the Indiana Department of Environmental Management plans to incorporate air, water, and land requirements for the auto salvage sector into a multi-media self-certification, compliance assistance and inspection program in accordance with the ERP model.

Project Overview

An ERP is a common sense approach to achieving enhanced environmental protection. The IDEM proposes to use the ERP approach to assist the Auto Salvage Recyclers (ASR) in understanding and complying with program regulations and going beyond compliance to prevent pollution and provide for increased protection of public health and the environment.

IDEM will implement the following activities:

1. Multi-media compliance assistance including guidance manuals, a web site, workshops, confidential phone assistance, and on-site compliance assistance. A major component of compliance assistance will be to encourage use of best management practices to help achieve compliance;
2. Multi-media inspections/enforcement and self-certifications; and
3. Strategically-based environmental performance measurements. IDEM will conduct two separate evaluations to compare and statistically evaluate the effectiveness of compliance assistance, and self-certifications.
    a. IDEM will establish a random process for inspecting auto salvage facilities from a set data base provided by the Bureau of Motor Vehicles (BMV).
    b. In order to establish baseline performance, IDEM will evaluate the environmental performance of these randomly selected sites via a multi-media inspection process prior to opportunities for self-certifications.
    c. After facilities have an opportunity to participate in a self-certification program, IDEM will again establish a random inspection process from the same BMV data base used in a. above. Compliance results from baseline inspections will be compared to compliance results from this second round of random inspections. Improved performance will be determined through compliance rates, pollution prevented and the company's incorporation of BMPs in salvage-yard practices. *Any inherent biases will be recorded and evaluated as well. See workplan discussion.*

In addition the information developed and gathered during this project will be potentially transferable to other sectors.

Project Workplan

The project will begin immediately after a grant award and approval by IDEM's Grant Management. The project will begin with internal meetings with management staff, inspection staff, IT staff and compliance assistance staff to define, explain, coordinate, collaborate and plan for project implementation. An internal workgroup of 3-4 staff from the above group will work on developing and fine-tuning the metrics to be tracked by this project including Best Management Practices (BMPs) and environmental performance measures. IT staff will work with the project lead and a small workgroup of inspection and compliance assistance staff to fine tune, adjust and implement tracking ERP data within the already existing compliance tracking database called IRATS. The project lead will periodically throughout the life of the project review, discuss, and consult with EPA on project development and adjust plans and work product as appropriate.

In conjunction with establishing and tracking metrics, IDEM will identify and meet with external stakeholders to explain, coordinate, collaborate and plan for project implementation. Stakeholders already identified include the Indiana Auto Salvage Recyclers (ASR), the Bureau of Motor Vehicles (BMV), Department of Natural Resources (DNR), County Health Departments, local Sheriff's and Police departments, County Commissioners, EPA and the public. IDEM expects to complete internal and external meetings to establish plans for project implementation within the first 3 months. However, internal and external meetings will occur throughout the life of the grant on an as needed basis.

In addition to the above meetings, IDEM will work towards and conduct baseline inspections including:

- Randomly selecting sites to be inspected from the general population of ASRs. IDEM plans to utilize the most current BMV database. (At a 90% - 95% confidence interval we estimate approximately 60 – 80 random inspections).
  IDEM will utilize on-site qualified staff to help with random generation.
- Improving and revising an already existing multi-media auto salvage checklist.
- Improving and updating an already existing auto salvage inspection training manual.
- Training 8 industrial waste compliance staff to conduct multi-media inspections and enforcement utilizing the revised checklist.
- Conducting multi-media compliance inspections of the randomly picked sites.
- Preparing an appropriate multi-media enforcement response.
- Writing press releases for a number of significant sites for all stakeholders including the public.
- Tracking inspection data and evaluating that data to determine specific outreach needs to then be incorporated into workshops, web site, and other outreach efforts.

IDEM expects that baseline inspections will be completed within 15 months.

The next phase of the project includes outreach efforts, self-certifications and related activities, and compliance assistance.

- An information and education effort to notify and inform the sector of this pilot project will be conducted early in this phase and may include press releases, mail, e-mail, web page

information, and workshops. Self-certification forms and Return-to-Compliance Plans will also be distributed at this time and via this way.

- IDEM developed a compliance manual through a previous OECA grant ("Prototype Sector Model for Outcome-based Performance Measures" 2001-2005). The "Compliance Manual for Indiana Auto Salvage Facilities" includes all applicable State and Federal requirements, BMPs, and a compliance screening checklist. IDEM currently has a contract in place to update and improve this manual. We will continue to update and distribute the revised manual along with posters and a guidebook on how to remove mercury switches.
- The workshops will provide direct outreach and training. Among agenda items about, regulations, compliance and BMPs, the workshops will provide a forum to discuss the self-certification details and provide guidance for its completion. On-site technical and compliance assistance will be offered as resources allow.
- Follow-up and/or enforcement efforts (as applicable) for failure to submit the self-certification form, the return to compliance form, and /or instances of significant non-compliance will be conducted in this phase as well. Post certification inspections may be conducted in the certification phase. These inspections serve to verify self-certification data, return to compliance data, and provide further input into the statistical model to document changes from baseline conditions.

***Note regarding self-certifications**: The Indiana ASRs have developed and offer their membership a self-audit/self-certification program. To date approximately 10 – 15 facilities have participated. IDEM will work with the ASR group to ensure that the self-certification form that IDEM develops and distributes and the self-certification form that is offered by the ASR will contain the same metrics to be tracked by this project.

In addition the 10 – 15 facilities will be part of the randomly inspected sites to establish baseline and for post-certification inspections. Whether they get inspected will be based on the random generator. The IDEM multi-media compliance checklist will include a question regarding their participation in any self-audits and will be tracked for final evaluation.

IDEM expects this second phase of activity to be completed within the first 2 years of the grant.

IDEM will next conduct a second round of random multi-media inspections from the same list used to determine the first round of random inspections utilizing the same multi-media inspection form. We will prepare the appropriate multi-media enforcement response and track the data from these inspections. IDEM expects that the second random inspections will be completed within the third quarter of 2009.

The final phase of the project will involve the analysis of the data and the development of a report documenting results. IDEM will analyze and compare baseline, self-certification and post-certification data to understand change in facility performance and overall outcomes of interest. Indiana currently has eleven pre-qualified contractors that have the necessary resources to provide the statistical services required as part of this grant. At the appropriate time, IDEM will solicit bids and select the most qualified contractor/candidate with appropriates statistical qualifications and expertise. Results will be shared with EPA partners, stakeholders, the ASRs, and the public.

ERP Development and Implementation

The ERP will be developed in consultation with broad stakeholder input that includes the ASR trade organization and the direct involvement of the target facilities. The ERP will be developed to maximize the likelihood that measurable environmental results will accrue from the project. The ERP will also be developed in a manner that allows for the transfer of the project design to new sectors and programs in Indiana as well as to other state programs.

Implementation of the ERP will follow the EPA and other State guidance on developing and implementing an ERP, including but not limited to, the "Massachusetts Environmental Results Program," Model State Compliance Assurance Program Guide, "ERP Roadmap" and the "Generic Guide to Statistical Aspects of Developing an Environmental Results Program." The ERP will be governed by sound data collection and analysis procedures of the project QAPP. The QAPP will be developed and amended as necessary to ensure data quality objectives are met and measurable environmental results are documented.

The project lead along with internal staff including inspection staff (IWC), IDEM enforcement staff, IDEM management, engineering, IT staff, media and communications staff, and compliance assistance staff (CTAP) will be responsible for overall development, management, implementing and reporting. In addition, IDEM will utilize a contractor to provide the statistical evaluation required by the grant. *Note: Indiana currently has eleven pre-qualified contractors that have the necessary resources to provide the statistical services required as part of this grant. At the appropriate time, IDEM will solicit bids and select the most qualified contractor/candidate with appropriates statistical qualifications and expertise. IDEM will provide EPA a copy of the bio/ resume of the statistical services personnel when that person(s) is identified.* Specifically project lead, IDEM staff and contractor will be responsible for:

- Project design
- An outside contractor will assist with and provide the statistical methodology, review and analysis of project data and QA/QC, and presentation of results
- IT staff will develop necessary data systems and hardware infrastructure
- CTAP and IWC along with our Media and Communications office will further develop outreach materials including press releases
- IWC will conduct inspections
- CTAP will assist with on-site and phone compliance assistance, developing and implementing workshops, updating guidance materials
- Project Lead and Support will provide EPA reports

Stakeholder Involvement

The project will seek broad stakeholder involvement in the design and implementation of the project. Stakeholders will include at a minimum: The ASRs, State Board of Health, County Health Departments, County Commissioners, Sherriff and Police Departments, the Bureau of Motor Vehicles, EPA, other States who have implemented ERP at Auto Salvage sites, IDEM staff and the public.

Public Involvement

IDEM will actively work with the Indiana Auto Recycler's Association and their members and contractor to enhance and participate in their self-certification program.

We will utilize the press to spread the word regarding assistance and environmental results to all stakeholders including the public.

Additionally, many of Indiana's auto salvage sites are in rural, non-zoned areas that are economically depressed. By seeking out and improving environmental performance within these communities, a new level of oversight and dialogue between community residents, facility owners/operators, and IDEM may ensue. In turn, IDEM hopes that the auto salvage businesses will become better environmental stewards to the local community and state.

Performance Measurement

This project focuses on utilizing a compliance-assistance, self-certification process to achieve compliance at auto salvage facilities that present a potential for contaminant releases to air, surface water, groundwater, and the land. In addition, we will use the ERP evaluation mechanism to measure results.

The project establishes goals for innovation, and indicators to measure progress toward those goals by using the ERP model. The project is designed to demonstrate accountability for environmental results within the sector by measuring progress of key project indicators. The information concerning project design, tracking, measurement, and reporting of results will all be maintained for review. Results from the project would be generated quarterly and annually. Specific goals for the project would include both environmental result goals as well as compliance goals.

The environmental results goals would be derived from the key indicators of the project and will include measures for:

- improvements to surface water through annual water samples showing less contamination getting to stormwater
- improvements to groundwater and soil through an increase in the number of sites cleaning up historical contamination and a decrease in time of the number of sites requiring extensive soil remediation
- improvements to air through more refrigerants being captured, less open burning
- improvements to public health through the above and the number of tires removed reducing chances of fires and disease

The compliance goals for the project include:

- Improved facility knowledge of multi-media requirements and BMPs as a result of number of outreach materials provided, sites visited, workshop attendees
- Increase in the number of stormwater NOI's submitted
- Increase in the number of P3 plans developed
- Increase in the amount of contaminated soil removed
- Increase in the amount of tires removed
- Increase in the amount of solid waste debris removed

- Decrease in the amount of spills reported
- Decrease in the number of "used oil" violations
- Decrease in the number of "open burning" citations
- Decrease in the number of referrals to EPA for refrigerant violations
- Increase in the use of EPA approved refrigerant removal equipment (MVACs)
- Increase in the number of sites removing mercury switches
- Fewer complaints
- More requests for assistance
- Increase in the number of sites utilizing BMPs for mercury switch removal
- Increase in the number of sites using BMPs for battery storage
- Increase in the number of sites using BMPs for fluids management
- Increase in the number of sites registered with the BMV

Indicators of Compliance with Requirements

Indicators of compliance will be demonstrated through BMPs, contaminated soil and debris removed and properly disposed, water cleaned, less complaints, and overall compliance with all environmental regulations including air, land and water *(as above).*

Reflect Environmental Outcomes

The project's proposed environmental outcomes are outlined in Table 1: IERP Project Outcome Summary (Logic Model). Additionally, the IERP project proposed outcomes were compared to the 2003-2008 EPA Strategic Plan. The results of the comparison are summarized in Table 3: IERP Project Comparison to EPA Strategic Plan.

Data Quality Assessment, Validation and Usability

The quality of data required to demonstrate compliance with applicable auto salvage regulations will be consistent with what is currently required at auto salvage sites. Both data and secondary data will be validated using protocols to be developed in accordance with the project QAPP. IDEM will provide a QAPP within 60days of approval of the grant workplan. Because data will be dealt with on a continuum, IDEM will continually review, improve and modify the QAPP throughout the grant project as appropriate.

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

Data Analysis

All data analysis will be governed by the project-specific QAPP. As mentioned above, IDEM will provide a QAPP within 60days of approval of the grant workplan.

Measurable Environmental Improvement

This project is designed to improve environmental results by the intended outcomes of:

- Protection of nearby water sources and waterways as a result of cleanup, remediation, and compliance with cleanup standards, proper fluids management and by meeting stormwater requirements.
- Protection of our air and ozone from refrigerant releases and open burning
- Improved aesthetics as a result of compliance and utilizing best management practices resulting in happier neighbors and less complaints.
- Saving resources to the facility, community and the state as a result of increased compliance and improved operations. Improved operations will negate the need for remediation/cleanup that results from poor management.

The ERP model will allow the measurement of annual compliance progress. This ERP model consists of an initial round of multi-media inspections of a statistically valid number of facilities, multimedia outreach and education, a voluntary self-certification, follow-up inspections, and data analysis that will result in statistically valid compliance reports to document project performance. Current environmental programs tend to measure outputs rather than outcomes, whereas this approach could measure environmental results on a total impact basis.

Transferability

The program may serve as a model to other states and can be easily adapted to meet respective state's programs and needs.

The auto salvage self-certification project will use IDEM resources, the Indiana Auto Recycler's Association, EPA and other agency resources.

Any and all resources prepared and developed for use within the self-certification program, multi-media inspections and enforcement, workshops, workbooks, fact sheets, guidebooks, etc., will be available as models for other states via the agency's auto salvage web site, or through hard copy.

IDEM intends to make many of its compliance assistance tools available on the web site for review by both industry sector participants, community partners and organizations, and other states interested in replicating the project.

Lessons learned and results and data obtained will be compiled, documented and made available for anyone's use.

IDEM will provide staff to travel as needed to discuss the auto salvage ERP with other regulatory entities.

The ERP approach may also be applicable to other IDEM sector-based initiatives including scrap processors, fiberglass, confined feeding, dry cleaning and auto repair.

Reporting

The IDEM will prepare quarterly reports on the progress of the IERP State Innovation Grant project. These reports will track completion of project milestones, expenditures of funds, important outcomes, and unexpected problems or issues.

The IDEM will provide a final project report to both the USEPA Region V and National Center for Environmental Innovation. The final report will assess the overall success of the project and address issues related to transferability identified within the proposal. The IDEM will submit the quarterly and final reports to the USEPA Region V Project Officer and a copy to the Office of Policy, Economics, and Innovation's State Innovation Grants Coordinator.

Project Budget (estimated)

See attached budget sheet.

Project Organization, Roles and Responsibilities

The IDEM has been providing compliance and technical assistance since IDEM was formed in 1985 and then more structured pollution prevention information and outreach since 1987 when the Office of Pollution Prevention and Technical Assistance (OPPTA) was established. The Compliance and Technical Assistance Program within OPPTA provides confidential regulatory and non-regulatory assistance through voluntary incentive programs, published informational materials, workshops, internet sites, phone and on-site visits.

IDEM's Industrial Waste Compliance section has been conducting hazardous and industrial waste inspections since IDEM was formed 1985 and prior to that through the State Board of Health. An industrial waste focus was added to the hazardous waste inspections in 1999. And multi-media screening via a screening checklist has been conducted at all industrial waste inspections since 2000.

Ms. Rosemary Cantwell, Section Chief, Industrial Waste Compliance Section, has over 20 years experience at IDEM in inspections, enforcement, special projects, solid waste, and pollution prevention.

Ms. Sandra Elyusuf, Senior Environmental Manager 1, CTAP, OPPTA has 5 years experience at IDEM as a confidential multi-media compliance consultant.

This project will be managed from the Office of Land Quality, Industrial Waste Compliance Section of the IDEM. Bios or resumes of the key personnel are attached.

Logic Model (see attached Table 1)

As the logic model outlines, IDEM will initially identify and involve key personnel and stakeholders in the development of specific project activities. Second, staff will conduct baseline inspections of the general population of auto salvage recyclers. Third, compliance assistance, outreach opportunities, self-certifications will be offered to the auto salvage recyclers. Fourth, a random number of inspections will be conducted of the general population. And finally, all the data will be analyzed to evaluate facility performance, and the effectiveness of self-certifications and compliance assistance on achieving compliance and improved environmental conditions.

Table 1: IERP Project Outcome Summary (Logic Model)

Inputs/Activities	Outputs	Short-Term Outcomes	Intermediate Outcomes	Environmental/ Economic Outcomes
- Identify personnel engaged in the IERP project – IDEM, EPA, ASR association members, BMV, DNR, County Health Departments, other interested parties - Identify the universe of auto salvage sites	-Number of personnel and stakeholders - Extent of personnel and stakeholder involvement - Number of registered auto salvage sites			
-Establish BMPs - Establish performance measures - Develop multi-media checklist for inspections incorporating BMPs - Develop a self-certification checklist and return to compliance plan - Establish training needs for inspection personnel. Develop training material - Determine outreach needs	- checklist for multi-media inspections incorporating BMPs - guidance manual for the inspector - power point presentations and other training materials for the inspector - training workshop for the inspectors - number of press releases – number of other outreach materials - self-certification checklist and return to compliance plans	- Improved inspector knowledge of multi-media issues and BMPs at auto-salvage sites as a result of # trained and # of improved inspector materials		
- Inspect a random number of auto salvage sites to establish baseline performance - Evaluate results to determine outreach needs	- Number of facilities out of compliance - Number of violations for each measurable outcome - Number of BMPs in place		- Increase in the number of stormwater NOI's submitted - Increase in the number of P3 plans developed - Increase in the amount of contaminated soil removed - Increase in the amount of tires removed - Increase in the amount of solid waste debris removed - Decrease in the amount of spills reported - Decrease in the number of "used oil" violations - Decrease in the number of "open burning" citations - Decrease in the number of referrals to EPA for refrigerant violations - Increase in the use of EPA approved refrigerant removal equipment (MVACs) - Increase in the number of sites removing mercury switches - Fewer complaints - More requests for assistance - Increase in the number of sites utilizing BMPs for mercury switch removal	
- Update outreach materials. - Develop a workshop agenda - Provide regulatory and technical assistance to all auto salvage sites through compliance manuals and workshops - Mass mail self-certification guides and return to compliance plans - Review returned self-certifications and compliance plans - Evaluate accuracy of data through GIS and targeted inspections - Conduct compliance assistance site visits as requested at sites to assist with and evaluate BMPs to achieve compliance. - Conduct inspections at all auto salvage sites for those that IDEM receives complaints about	- Number of compliance assistance materials distributed - Number of workshops conducted - Number of self-cert guides mailed and return to compliance plans mailed and received - Number of complaint inspections conducted - Number of follow-up compliance assistance site visits conducted - Number of self-certified facilities in compliance - Number and type of self-reported violations	- Improved facility knowledge of multi-media requirements and BMPs as a result of number of outreach materials provided, sites visited, workshop attendees		- Measured improvements in environmental performance measures - An increase in cost effectiveness will be measured by a decrease in hours required by the state to respond to complaints - Measured improvements to surface water through annual water samples showing less contamination getting to stormwater - Measured improvements to groundwater and soil through a decrease in the number of sites requiring extensive soil remediation - Measured improvements to air through more refrigerants being captured, less open burning - Measured improvements to public health through number

			- Increase in the number of sites using BMPs for battery storage - Increase in the number of sites using BMPs for fluids management - Increase in the number of sites registered with the BMV	of tires removed reducing chances of fires and disease caused from mosquitoes. - Overall benefits to the community through better air, cleaner water, less likelihood for vector breeding, less potential for fires, improved aesthetics, and an improved economy
- Inspect a second round of a random number of auto salvage sites to compare results to the baseline performance of the first round of random inspections - Evaluate facility performance of "self-certified" sites by comparing results of first random inspections to the results of the second round of random inspections using the the ERP Results Analyzer spreadsheet at http://www.epa.gov/permits/erp/roadmap/matlist.htm#statmethod - Evaluate the number of complaints received over 4 years to determine an increase or decrease in amount and severity.	- Number and type of violations noted during random inspections related to outcome measures - Number and type of violations noted during "complaint" inspections related to outcome measures			
- Develop spreadsheet and input data - Analyze data - Report to EPA	- Spreadsheet with data from inspections, self-certifications, enforcement and compliance assistance. - Quarterly reports to EPA - Report on the IERP process for other state's use and future sectors			

Target Dates and Milestones

Table 2: Schedule of Major Project Tasks

Task Name	Task Description	Start Date	End Date	Milestone
QAPP	Develop final QAPP		August 1, 2006	Submit QAPP to EPA
Criteria for Measuring Environmental Results	Develop metrics to be tracked by this project	Q4/2006	Q4/2006	Revise QAPP to include final metrics Provide list
	Develop and implement an approach to cost-effectively input and manage the ERP data, including data from inspection reports, enforcement actions and facility self-certification forms.	Q4/2006	Q4/2006	Have data base capable of tracking report information
Partnerships	Further enhance partnerships with the Bureau of Motor Vehicles, Indiana Auto Recycler's Association, and other affected agencies and programs	Q4/2006	Q4/2006	Report on the number of partners and their involvement in the project
Baseline Inspections	Improve and revise the multi-media auto salvage checklist	Q4/2006	Q4/2006	Provide a copy of the checklist
	Improve and update the inspection training manual	Q4/2006	Q4/2006	Provide a copy of the manual
	Train 8 industrial waste compliance staff to conduct multi-media inspections and to manage informal enforcement	Q4/2006	Q4/2006	Report on progress of training and the number trained
	Conduct multi-media compliance inspections at a random number of sites generated from the most current Bureau of Motor Vehicles list of registered auto salvage sites (approximately 650 registered sites)	Q1/2007	Q4/2007	Report on the number of sites inspected

Task Name	Task Description	Start Date	End Date	Milestone
	Prepare the appropriate multi-media enforcement response. Enforcement response may include but not be limited to compliance schedules, diverse cleanup options, and stipulated penalties only.	Q1/2007	Q4/2007	Report on the number and types of enforcement actions necessary
	Analyze inspection and enforcement data of the first random inspections to establish a baseline for performance measurement. Prepare a report on baseline data.	Q1/2007	Q4/2007	Report on the number of sites out-of-compliance, the number and types of violations for each measurable outcome
Compliance Assistance	Improve/Update/Print/Distribute guidance manuals, mercury switch books, Web site. (See comment under project workplan)	Q4/2007	Q1/2008	Provide web link to all out reach materials or provide hard copy
	Develop an agenda for 3 - 5 workshops to be conducted throughout the State. Include as an agenda item information on how to safely remove and manage mercury switches at the site. Conduct workshops.	Q4/2007	Q1/2008	Provide copy of agenda and list of attendees
Self-certifications	Conduct a mass mailing giving every auto salvage site (on the BMV list) an opportunity to participate in a self-certification program and submit "return to compliance plans."	Q2/2008	Q2/2008	Provide a copy of information mailed
	Review self-certification data and "return to compliance plans" after receipt of forms. Evaluate accuracy through GIS and targeted inspections. Identify and target facilities that need enforcement or assistance.	Q2/2008	Q4/2008	Report on facilities participating, accuracy of reports, and the number and type of compliance assistance

Task Name	Task Description	Start Date	End Date	Milestone
	Develop an appropriate multi-media enforcement response to environmental issues not addressed through return to compliance plans. Enforcement response will include but not be limited to compliance schedules, diverse cleanup options, and stipulated penalties only.	Q2/2008	Q4/2008	Report on the number and type of enforcement actions
Follow-up inspections	Conduct multi-media compliance follow-up inspections at a random number of sites generated from the same Bureau of Motor Vehicles list of registered auto salvage sites. (approximately 650 registered sites)	Q1/2009	Q3/2009	Report on the number of inspections conducted
	Prepare the appropriate multi-media enforcement response. Enforcement response will include but not be limited to compliance schedules, diverse cleanup options, and stipulated penalties only.	Q1/2009	Q3/2009	Report on the number and type of enforcement actions
Data Analysis	Analyze and compare baseline, self-certification and post-certification data to understand change in facility performance and overall outcomes of interest.	Q1/2009	Q4/2009	Include in final report to EPA
	If time permits, analyze inspection and enforcement data from a previous OECA grant that "targeted 50" sites based on established significant criteria to determine environmental results and overall outcomes of interest. Compare results of targeted inspections vs. second of random inspections.	Q4/2009	Q4/2009	
	Determine the number of complaints received yearly from 2006 through 2009 to evaluate an increase or decrease in numbers.	Q4/2009	Q4/2009	Report in final report to EPA
EPA Reporting	Reporting shall include quarterly, annual and final reports.	Q4/2006	Q4/2009	

Table 3: IERP Project Comparison to EPA Strategic Plan

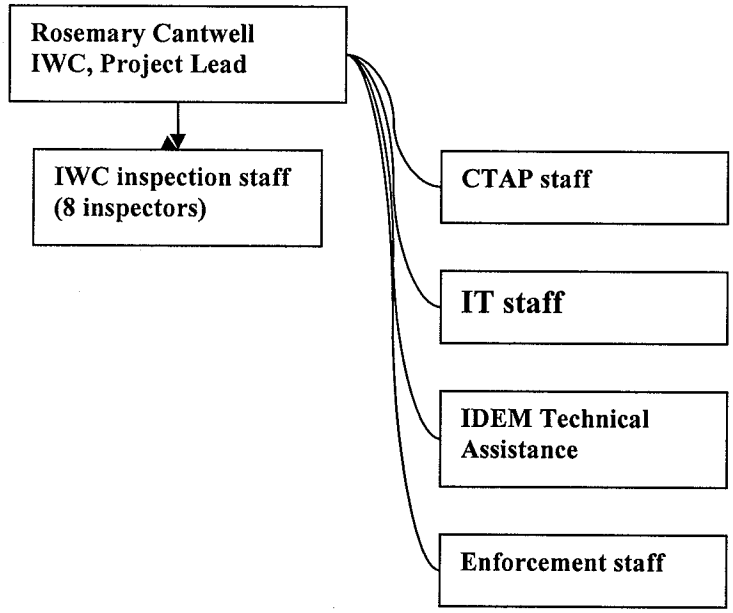
EPA Strategic Plan and Goals	Objective/Sub objective identified within the 2003-2008 EPA Strategic Plan
Goal 2: Clean and Safe Water	Objective 2.1: Prevent contamination of drinking water sources, and Objective 2.2 Protect water quality Strategic target: - Reduce vehicle fluids releases to the ground, surface water and groundwater - Assure compliance with stormwater and fluids management requirements
Goal 3: Land Preservation and Restoration	Objective 3.1: Reduce adverse effects to land by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products. Strategic target: - Manage solid and hazardous waste and fluids properly - Increase BMPs by 20%
Goal 4: Healthy Communities and Ecosystems	Objective 4.0: Create strong partnerships with federal, state, and local government agencies; and enlist support of many stakeholders: Sub objective 4.1.4: Protect human health, communities, and ecosystems from chemical risks and releases through facility risk reduction efforts. Strategic target: - Establish stakeholders - Increase facilities knowledge of environmental requirements and BMPs - Work with sites to clean up polluted ground and ground water - Develop and implement procedures for safe use and management of vehicle fluids
Goal 5: Compliance and Environmental Stewardship	Objective 5.1: Improve compliance. Strategic target: - Provide compliance assistance to 20% of auto salvage sites - Provide compliance incentives Objective 5.2: Improve environmental performance through pollution prevention and innovations. Strategic target: - Improve use of BMPs by 20%

Key Personnel Biographies:

Rosemary Cantwell, CHMM - Rosemary Cantwell, is a graduate of Indiana University, with a BS degree in Health and Safety. She is employed with the Department of Environmental Management as a Senior Environmental Manager Supervisor, in the Office of Land Quality, Industrial Waste Compliance Section. An Indiana State employee for 21 years, she has worked for Special Waste, Hazardous Waste Enforcement, and Pollution Prevention, all located at IDEM. She is certified as a Hazardous Materials Manager, and is a part-time instructor with Indiana University, teaching classes in Solid and Hazardous Waste Management.

Sandra El-Yusuf , B.S.-Sandra El-Yusuf is a graduate of Western States University, with a B.S. degree in Environmental Health and Safety. She has been employed with the State of Indiana and the Department of Environmental Management for 8 years, and has a total of 26 years experience in the environmental field. Sandra works in the Compliance and Technical Assistance Program (CTAP) as a confidential consultant, for air, water and land regulations.

Project Organizational Chart



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM)
INNOVATIONS AUTO SALVAGE GRANT
OCTOBER 1, 2006 - SEPTEMBER 30, 2009

COOPERATIVE AGREEMENT BUDGET SUMMARY

Personnel	$68,749
Fringe Benefits	$23,292
Travel	$5,004
Supplies	$2,280
Other Costs	$31,400
Equipment	$28,664
Contractual	$42,500
Indirect Costs	$13,226
FEDERAL SHARE	$215,115
STATE SHARE (See In-Kind Match Budget for Details)	$18,657
TOTAL	**$233,772**

FEDERAL SHARE BUDGET DETAIL

A. PERSONNEL

Position	Annual Salary	Hourly Rate	Project Hours	FTE	Subtotal	Total
Sr Env Mgr S3 (OE)	$56,527	$28.99	292.5	0.050	$8,480	Nancy Johnston
Senior Env. Manager 1	$43,460	$22.29	292.5	0.050	$6,520	Sandra El-Yusuf
Sr Env Mgr S3	$58,934	$30.22	1170	0.200	$35,357	Rosemary Cantwell
Env Engr 1	$58,286	$29.89	146.25	0.025	$4,371	Jeff Moody
Senior Env. Manager 1	$53,664	$27.52	146.25	0.025	$4,025	Jenny Dooley
Office of Enforcement Staff	$42,500	$21.79	146.25	0.025	$3,187	Various Staff
Land Quality Compliance Assistance Staff	$45,392	$23.28	292.5	0.050	$6,809	Various Staff
Subtotal Personnel			2,486.25	0.43	$68,749	
Total Personnel						$68,749

B. FRINGE BENEFITS Personnel X 17.29 + $8,945 per FTE per year (Calculated for three years) $23,292

C. TRAVEL

In-State Travel

Travel to conduct inspections	Per Diem:	0 Person	X	0 Trips	X	$32	=	$0
	Lodging:	0 Person	X	0 Trips	X	100	=	$0
	Gasoline						=	$800
								$800
Total In-State Travel								$0

Out-of-State Travel

1. Travel to U.S. EPA, Region V, Chicago, Illinois

	Per Diem:	1 Person	X	2 Trips	X	$32 =	$64
	Lodging:	1 Person	X	2 Trips	X	150 =	$300
	Parking:	2 Trips	X	2 Days	X	35 =	$140
	Mileage	0 Trips	X	360 Miles	X	0.28 =	$0
Subtotal Out-of-State U.S. EPA , Chicago, IL							$504

These trips will allow IDEM staff to meet with U.S. EPA staff to discuss issues involving the Auto Salvage Innovations Cooperative Agreement.

2. Training / Conferences- Out of State

Subtotal Out-of-State Travel	$1,000 per trip	X	3 =	$3,000		
3. State to State Technical Assistance				$1,500		
Total Out-of-State Travel					$5,004	
Total Travel						$5,004
D. SUPPLIES						
General Office Supplies/Computer Supplies/Software						
Mobile Printer accessories				$280		
Voice Recognition Software				$1,000		
General Office supplies - Binders, Paper, etc				$1,000		
Total Supplies						$2,280
E. OTHER COSTS						
Printing / Binding				$2,500		
ImageConnect Premium Access (6-15 user)				$18,200		
Verizon Data Access Charges				$9,000		
Postage				$1,200		
Rule Books				$500		
Total Other Cost						$31,400
F. EQUIPMENT						
5 Tablet Computers				$19,620		
Computer Accessories				$6,220		
Mobile Printer and adapter				$1,740		
Digital Camera with accessories				$420		
8 Tripp Lite Inverters				$664		
Total Equipment						$28,664
G. CONTRACTUAL						
Programming				$20,000		
Statistician Contract	$150 x	150 Hours	=	$22,500		
Total Contractual						$42,500
H. INDIRECT COSTS	(Salary +	Fringe Benefits)	X	14.37%		$13,226
Total Budget						$215,115

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM)
INNOVATIONS AUTO SALVAGE GRANT
FEBRUARY 1, 2006 - JANUARY 31, 2009

BUDGET SUMMARY - IN-KIND MATCH

Personnel	$13,619
Fringe Benefits	$5,038
Travel	$0
Supplies	$0
Other Costs	$0
Equipment	$0
Contractual	$0
Indirect Costs	$0
STATE SHARE	$18,657
TOTAL	**$18,657**

STATE SHARE BUDGET DETAIL

A. PERSONNEL

Position	Annual Salary	Hourly Rate	Project Hours	FTE	Subtotal	Total
Auto Salvage Inspection Staff	$45,392	$23.28	585	0.100	$13,619	Various Staff
Subtotal Personnel			585.00	0.10	$13,619	
Total Personnel						$13,619

B. FRINGE BENEFITS Personnel X 17.29 + $8,945 per FTE per year (Calculated for three years) $5,038

C. TRAVEL

Total Travel $0

D. SUPPLIES

Total Supplies $0

E. OTHER COSTS

Total Other Cost $0

F. EQUIPMENT

Total Equipment $0

G. CONTRACTUAL

Total Contractual $0

H. INDIRECT COSTS (None required for in-kind match) (Salary + Fringe Benefits) X 14.37% $0

Total Budget $18,657