

**State Innovation Grant Program  
Project Narrative  
Submitted by the Wisconsin Department of Natural Resources  
April 2005**

**Project Title:**

Improved Environmental Results and Increased Regulatory Flexibility in Air Permitting for the Printing Sector Using Environmental Management Systems and an Environmental Results Program

**Applicant Information:**

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**Funding Requested:**

\$205,000

**Project Period:**

July 2005 through June 2008

## INTRODUCTION

Since June 2003 the Wisconsin Department of Natural Resources (WDNR) Air Management Program has been conducting an extensive evaluation of our air permit program. The focus of this evaluation, the Air Permit Improvement Initiative, (APII), is to develop and implement ways to improve efficiency in environmental regulation and program implementation while meeting the environmental protection needs of our citizens. The principal goals of this initiative are to streamline the process and find innovative air permitting alternatives. This initiative came about due to concerns over the amount of effort and time involved in air permitting as well as reservations about the value of this activity in achieving environmental improvement. Also, like many state and local environmental agencies, resources at WDNR are declining and this trend is likely to continue for the foreseeable future. There is also strong interest in adopting a more comprehensive approach to environmental regulation. All these circumstances provided a strong incentive for the development of innovative and efficient permit alternatives.

WDNR is interested in receiving a State Innovation Grant to support an innovative project that would apply both Environmental Management Systems (EMS) and an Environmental Results Program (ERP) within the printing sector in Wisconsin. The goals of the project are to improve the environmental stewardship of participants while providing regulatory flexibility and reducing the air permit burden. This is also part of a larger goal to accomplish vertical integration of permitting options for the printing sector as a significant step towards creation of a performance based approach to managing environmental risk. A secondary goal would be to develop this proposal in such a manner that it could be applied to other industrial sectors as well as include other environmental media.

The printing industry in Wisconsin is diverse in size and products, vital to the state's economy and responsible for managing numerous environmental risks including volatile organic compound and hazardous air pollutant emissions. By partnering with our Department of Commerce (WDCOMM) Small Business Assistance Program and the industry, we believe we can improve compliance with air, waste and water regulations through an ERP program for the small facilities. For larger printing facilities WDNR would seek to achieve environmental results beyond current regulatory requirements and reduce air permitting burden through an EMS based permit system.

WDNR is interested in establishing innovation in permitting across the printing sector in Wisconsin. The ERP and Title V EMS Permit projects proposed for grant funding are a critical part of our strategy. Additional tools, developed separate from this grant, are also being evaluated as part of an integrated multimedia sector-wide approach to the printing sector.

Statutory changes to Wisconsin's air permit program in Wisconsin Act 118 require WDNR to streamline through expanded permit exemptions, registration and general permits, and consolidation of construction and operation permits. In advance of statutory changes WDNR had already commenced its APII to streamline and re-engineer the air permit process. More information on this initiative can be found at <http://dnr.wi.gov/org/aw/air/apii/streamlining.html>. The first two phases of the APII, the assessment phase and the adoption of an air permits program framework with measurable targets, are complete. WDNR is currently in the redesign and implementation phase, which includes redesigning the air permit program to incorporate registration and general permits and development of alternative regulatory approaches.

Wisconsin Act 118 provides the legislative direction and statutory authority to implement a streamlined approach. The APII assessment provided a comprehensive analysis of the existing permitting system through focus groups with regulated facilities, environmental groups, economic development specialists and WDNR staff and evaluation of best practices in other states. From the assessment the following framework for permit streamlining was established:

- Expand permit exemptions.
- Develop standard permits, including registration and general permits.
- Develop permits with emission caps that allow for operational flexibility.

- Explore alternative regulatory approaches, including environmental results programs and environmental management system based permits.
- Streamline major source permits while meeting federal Clean Air Act requirements.
- Reduce the need to obtain construction permits.

This framework is designed to meet the following public, industry and WDNR needs that were identified in the assessment phase:

- Protect air quality.
- Provide facilities with permits in a timely manner with consistent requirements and incorporate opportunity for operational flexibility.
- Reduce administrative work for business and WDNR.
- Create incentives for facilities to voluntarily reduce emissions.

The innovation grant would support exploration of alternative regulatory approaches, a key component of the streamlining framework. Within the printing industry the Wisconsin Act 118 permit program would include a higher permit exemption level, registration permits for facilities that do not have emissions greater than 25% of the major source threshold, general permits for facilities with emissions above that level and traditional Title V permits for major sources. Under the innovation grant, WDNR would develop an ERP that would replace the need for registration permits and some general permits and cover the compliance responsibilities of those printing facilities as well as the smaller printing facilities exempted from permit requirements. The ERP would be developed to include waste and water regulatory requirements as well.

The state's Green Tier Law is the means for working with USEPA to gain acceptance of the Title V EMS Permit alternative envisioned as an alternative for major printing facilities. Green Tier establishes a voluntary system to recognize and reward superior environmental performance as defined by Wisconsin Act 276:

*"Superior environmental performance means environmental performance that results in measurable or discernible improvement in the quality of the air, water, land, or natural resources, or in the protection of the environment, beyond that which is achieved under environmental requirements..."*

Under Green Tier, companies, communities and government can negotiate contracts and charters that are flexible, innovative, efficient and enforceable. Contracts and charters are linked to an organization's environmental management system to assure predictable performance, due diligence and continual improvement. Self-auditing, public involvement and reporting make the processes transparent and verify the results. More information about Green Tier can be found at <http://dnr.wi.gov/org/caer/cea/environmental/>.

## **PERFORMANCE-BASED ENVIRONMENTAL MANAGEMENT SYSTEM PERMIT OVERVIEW**

### *SUMMARY*

Through this project the WDNR wants to assess whether a performance-based EMS can be combined with a Title V permit to produce the flexibility desired by industry and the environmental results and assurances desired by the WDNR. The Department hopes to show that this regulatory approach can reduce emissions beyond legal requirements and more effectively identify and manage environmental risk than a Title V permit alone. Careful attention will also be paid to the administrative requirements for WDNR and business, as well as seeking ways to improve the efficiency and effectiveness of public involvement in the permit development process and identification of priority environmental issues.

WDNR is exploring performance-based Title V EMS permits in order to achieve environmental performance across media that moves beyond minimum performance. Performance based means looking at the overall impact of practices in ways that can yield both environmental and economic results

and may include incentives. For example, a traditional permit for a printing facility may regulate emissions of volatile organic compounds (VOC) by setting permit conditions limiting the VOC content of the ink and the amount of ink that can be used. There may also be a requirement to use a control device with a minimum capture and control efficiency. Permit conditions like this do not provide an incentive for improved performance. Even if the facility were to use ink or a washing solution with a lower organic compound content or if they were to install a more efficient control device, they could not automatically use more ink. Instead, a permit modification would be required and even then, they would have to accept a limit at the lower organic compound content in order to increase ink use. This would prevent the facility from using higher VOC content inks for a short-term project even though total facility VOC emissions would meet permit requirements.

In contrast, a performance-based requirement may direct a facility to reduce total organic compound emissions from a facility by 50% over a certain time period. The facility is then free to reduce emissions by using inks with lower organic compound content, reducing the organic compound content of fountain solutions and blanket washes, experimenting with technology that applies less ink or wash, or installing more efficient control devices. It is the facility's performance that counts not the method. The result can be increased operational flexibility for the facility; experimentation with new technology not allowed under traditional permits, but encouraged under the performance based approach, and an overall increase in environmental performance.

WDNR expects that the performance-based EMS permit will meet all the requirements of Part 70 for a Title V permit including all applicable requirements and all methods for demonstrating and assuring continuous compliance, as well as the certification and reporting requirements. Along with this, WDNR seeks to combine the elements of environmental management systems, such as the performance goals, the setting of objectives and targets, and the establishing of environmental management programs, that can lead to and sustain superior environmental performance.

The Title V permit program is an important regulatory tool for the State of Wisconsin's Air Management Program. However, WDNR is also concerned about the administrative burden in revising Title V permits for small changes in facility operations that result in no environmental benefit for the effort. WDNR uses these permits to identify all air regulations that apply and what must be done to demonstrate compliance with those regulations at a specific facility. Some businesses contend that the approach WDNR takes in issuing Title V permits can be too rigid and does not allow for the flexibility intended in Part 70 requirements. The rigidity of the Title V program has led to concerns that it is stifling innovation and even preventing emission reductions. New Source Review requirements are cited as an example of this, where changes at a facility that reduce emissions may have to undergo construction permit review and revision of a Title V permit. WDNR believes that a performance-based EMS permit will be able to address these issues.

WDNR would issue performance-based Title V permits through Wisconsin's Green Tier law. Facilities interested in participating in this pilot program must meet the requirements of this law that include a record of meeting environmental compliance responsibilities. The entity must also have a functional environmental management system, commit to meet review and reporting requirements and most importantly commit to superior environmental performance as defined in the law. Green Tier allows the WDNR to provide incentives proportional to performance. Green Tier also establishes a more transparent process. In those instances that require flexibility under federal requirements there would be specific consultation with the United States Environmental Protection Agency (USEPA).

Green Tier is administered through WDNR's Cooperative Environmental Assistance Bureau (CEA). CEA was deliberately created outside the specific media programs in order to be able to work across all media in WDNR. CEA has committed to working with the Air Management Program to develop this innovative approach. They will also facilitate phasing in other media programs as the work progresses.

The performance-based Title V EMS permit project would commence in March 2005. We anticipate selecting two or three interested printing facilities to participate in the pilot project and receive EMS permits. The proposal includes establishing a control group of facilities that will be compared to pilot

facilities selected to establish a performance-based Title V EMS permit. Data on the environmental performance, compliance and administrative overhead will be used for the comparison. By July 2005 each participating facility will have established a stakeholder group. Because an EMS is multimedia in nature, there is an opportunity to address other media in addition to air quality in a performance-based permit. Based on the needs and goals of the pilot facilities, a multimedia team of WDNR personnel will be established to ensure that regulatory expertise in non-air areas is covered. The next 12 months would be spent in the development and issuance of Title V EMS permits for pilot facilities and initiating collection of performance data. In the third year of the project performance data would continue to be gathered and an independent program evaluation would be conducted.

#### *OUTCOME GOALS AND OBJECTIVES*

A performance-based Title V EMS permit would use the structure of an EMS as the holder of a facility's legal requirements including emission limitations, and compliance monitoring, reporting and recordkeeping requirements. In addition to these traditional permitting elements, it would also contain an analysis of significant environmental aspects; the development of environmental objectives and targets; and implementation of environmental management programs to produce results identified in the commitments. As a multimedia tool, the EMS will also address other media and is expected to provide cross media performance improvements. The overall goals of this element of the project are to:

1. Work with USEPA to establish a performance-based EMS Title V permit.
2. Provide comparative data on air, water, and solid and hazardous waste environmental performance that result from a performance-based approach.
3. Provide comparative data on the administrative costs to facilities and to WDNR.
4. Assess the efficiency and effectiveness of public involvement in performance based versus traditional permit approaches.

WDNR will ensure that all environmental data collection and analysis conducted as part of this grant will be done in accordance with a Quality Assurance Project Plan (QAPP) which has been approved by USEPA. An initial Quality Assurance Project Plan (QAPP) has been developed to guide the collection and evaluation of data used to assess Title V EMS permit outcomes and goals. After selection of the pilot facilities, identification of data elements is one of the initial objectives that will be accomplished. A revised QAPP will be prepared before data collection begins that will include all data elements.

An important consideration is the selection of a control group of reference facilities to provide comparative data to measure certain project goals and objectives. The revised QAPP will include selection criteria for the reference facilities and the selection criteria will be developed before data elements are finalized. In general, reference facilities will include similar Title V sources. To ensure a representative comparison, air pollutant emissions data for pilot facilities and reference facilities will be normalized to account for changes in production from year to year.

Outlined below are the objectives we are planning to achieve in each year of the three-year project.

#### Year 1

- Select data that can establish that a performance-based Title V permit incorporating EMS elements can meet all the requirements of Part 70.
- Establish a set of required elements of an EMS that includes a systematic method for evaluation of the EMS.
- Establish reduction goals for volatile organic compound (VOC) emissions and hazardous air pollutant emissions (HAP) as well as reduction goals for discharges in other media for pilot facilities.
- Establish a cross-media plan and reduction goals
- Develop an efficient and effective process to establish a performance-based permit that uses the capacity of an EMS.
- Establish stakeholder roles in the performance-based Title V permit process.

- Develop a comprehensive compliance strategy for a performance-based permit.
- Begin drafting performance-based Title V permits for pilot facilities.

#### Year 2

- Issue performance-based Title V permits to pilot facilities.
- Begin collection of data to compare a performance-based Title V permit with a traditional Title V permit.
- Gain acceptance by the USEPA of a permit that uses the structure of an EMS to hold the requirements of a performance-based Title V permit.
- Measure a reduction in volatile organic compound (VOC) emissions.
- Measure a reduction in hazardous air pollutant emissions (HAP).
- Measure reductions in pollutants in other media in addition to air that were established as priorities during the cross media planning step.
- Measure a reduction in time WDNR needs to review construction permit applications and revisions from participating facilities.
- Survey the public to establish their satisfaction.
- Cultivate interest from other printing facilities and facilities in other business sectors in pursuing performance-based Title V EMS permits.

#### Year 3 and Beyond

- Air emission reductions reduce the public's exposure to HAP and help improve air quality in ozone nonattainment areas.
- Attain and maintain environmental standards for other media established as priorities during the multimedia-planning step.
- Reduce administrative time for WDNR staff.
- Reduce administrative time for facilities in meeting regulatory obligations.
- Increased use of innovative pollution reduction methods.
- Establishment of lasting and meaningful partnerships between interested public and participating facilities.
- Use of performance-based Title V permits by other sectors.
- Transfer knowledge gained and share pilot program experience with others.

### **ENVIRONMENTAL RESULTS PROGRAM OVERVIEW**

#### *SUMMARY*

An ERP is an alternative approach for clarifying, achieving and measuring compliance with environmental regulations. This approach is different from the methods used in a traditional program. Under the usual scenario each individual facility is issued a permit, reports are submitted regularly, the regulatory agency performs periodic inspections, and when violations are found enforcement action is taken. This activity is usually done separately by different arms of a regulatory agency, each in control of one specific environmental media - water, air, or solid/hazardous waste. The traditional approach can tell you a lot about the compliance status of individual sources. However, the traditional approach has lacked the precision and scope to provide a statistically valid picture of the compliance level for an industry sector and has not generally been able to guide the assignment of resources to those areas of performance most in need of attention.

The initial activities necessary to develop a printer sector ERP will occur from March through June 2005. During this period the universe of sources will be identified, the statistical methodology for the facility inspections will be developed and Environmental Business Practice Indicators (EBPI) are established. The workbook as well as self-certification forms and inspection checklists will be completed before October 2005. By January 2006 compliance inspectors will be trained. Baseline inspections will be conducted by April 2006.

The results of these baseline inspections will be used to develop focused training for owners and operators and to revise workbooks and inspection checklists as needed. Training for owners and operators will be completed by October 2006. The next step, to be completed by April 2007, is the performance of self-inspections by owners and operators, submittal of checklists and implementation of actions identified in their return to compliance plans (RTC). The post-certification inspections are conducted by WDNR between April and July 2007. The compliance status of the sector will then be determined by comparing results of both sets of inspections performed under the statistical methodology developed. An independent evaluation of the ERP pilot will commence after July 2007.

#### *OUTCOME GOALS AND OBJECTIVES*

The principal goal is to develop an ERP for smaller printers in Wisconsin. While the level for “smaller” printers has yet to be defined, the program will not include facilities that require a Title V operation permit. It is anticipated that the ERP pilot will consider inclusion of the entire range of printing operations found in the state e.g. screen, digital, letterpress, lithographic, flexographic, and rotogravure.

An initial Quality Assurance Project Plan (QAPP) has been developed to guide the collection and evaluation of data used to assess ERP outcomes and goals. Identification of data elements to assess the ERP is one of the initial objectives that will be accomplished. A revised QAPP will be prepared before data collection begins that will include all data elements.

Outlined below are the objectives we are planning to achieve in each year of the three-year project.

#### Year 1

- Workbook and compliance checklist developed.
- Printing facility owners and operators attend ERP workshops.
- Owners and operators gain an understanding of their environmental responsibilities and request compliance assistance where understanding is incomplete.
- WDNR inspector training is conducted and performance baseline data is collected.

#### Year 2

- Printing facility owners and operators are trained on the use of the ERP workbook and submit timely self-inspection reports using the workbook and inspection checklist.
- Owners and operators improve their compliance with the requirements that apply to them. This results in:
  - Increased use of lower VOC and HAP coatings.
  - Improvement in the compliance rate with hazardous waste storage and disposal requirements is measured.
  - Improved management of clean-up solvents and waste.
- ERP program outreach is conducted and other businesses express interest in ERP development for their sectors.

#### Year 3 and Beyond

- Air emission reductions reduce the public's exposure to HAP and help improve air quality in ozone nonattainment areas.
- Printer facility owners and operators will make progress on additional EBPI's, such as pollution prevention and best management practices that are established as part of a continuous improvement cycle.
- Printing facility owners and operators will make informed decisions regarding their impact on environment.

- Overall environmental performance for the printing sector is documented to have improved through the implementation of an ERP.
- Printer facility owners and operators achieve equal or better environmental results, increase cost effectiveness and decrease in costs through ERP implementation.
- WDNR spends less time processing compliance data since all media managed through one program.

## **PROJECT SCHEDULE**

Outlined below is an initial list of activities for the project. It is anticipated that additional activities will be identified as project development moves forward.

### *PERFORMANCE-BASED ENVIRONMENTAL MANAGEMENT SYSTEM PERMIT ACTIVITIES*

#### 1. Baseline Information

- Collect VOC and HAP emissions baseline data for participating facilities (pilot and control) using Air Emissions Inventory Data.
- Collect data on construction permit application submittals and permit revision requests at participating facilities for the previous 5 years using Air Permit databases.
- Determine time lag between when a participating facility made the decision to make an operational change and the date the change actually occurred using facility records and DNR permit databases.
- Determine the administrative time WDNR has spent processing construction permits and revisions at participating facilities over the previous five years using Air Permit databases and employee time sheets.
- Participating facilities provide WDNR with information on the administrative time needed for them to meet regulatory commitments over the previous five years.
- WDNR gathers information from the public to ascertain awareness of public involvement requirements, past participation, and satisfaction with participation over the previous 5 years.

#### 1. Determine Regulatory Needs for Issuing Performance-based Title V EMS Permit

- Establish equivalency for federal New Source Review requirements.
- Work with the USEPA to obtain flexibility in some areas such as compliance demonstration.
- Work with the USEPA to craft a streamlined source specific SIP revision process.
- Define and set guidelines on what constitutes an acceptable EMS for this project.

#### 2. Set Multimedia Environmental Responsibilities

- Determine applicable requirements.
- Define compliance demonstration strategy.
- Identify and collect additional multimedia baseline data.
- Establish environmental goals and performance measures.
- Draft performance-based EMS permit with a phased approach for including other media.

#### 3. Provide Training to Pilot facilities, WDNR staff and Stakeholders

- For community groups identify expectations for the program and identify how environmental goals will be established.
- Conduct EMS training for staff and interested parties.

#### 4. Evaluate the performance-based Title V EMS Permit Pilot

- Measure emissions from participating facilities and compare with measured emissions from control group of facilities.
- Compare costs of performance-based permits with traditional permits including administrative and compliance obligations. Consider the following:
  - Number of construction permit application and permit revision requests at participating and control facilities.
  - Effort required by WDNR, pilot facilities and control facilities to process permit actions.
  - WDNR compliance effort expended for pilot and control facilities.
- Evaluate effectiveness of EMS to fulfill permit and compliance determination responsibilities.
- Evaluate public satisfaction with involvement in performance-based permit approach and compare it to the public's experience with involvement in the traditional permit process
- Complete project evaluation report.

#### *ENVIRONMENTAL RESULTS PROGRAM ACTIVITIES*

##### 1. Program Planning and Preparation

- Establish performance indicators for printing sector.
- Identify universe of affected sources.
- Develop statistical methodology and data management approach.
- Develop initial workbooks and inspection checklists.
- Conduct WDNR inspector training.

##### 2. Baseline Inspections and Follow-up

- Trained inspectors perform random baseline inspections of facilities.
- Performance indicators are reviewed and revised based upon inspection results.
- Data from baseline inspections is used to revise workbooks and inspection checklists.

##### 3. Compliance Certification

- Provide owners and operators with updated workbooks and checklists.
- Conduct technical assistance workshops.
- Owners and operators conduct inspections, submit self-certifications and implement return to compliance plans.

##### 4. Post Certification Inspections

- Self-certifications are reviewed and a targeted response developed.
- WDNR conducts appropriate follow-up on return to compliance plans.
- Statistical methodology is updated, retraining of inspectors is conducted and a new random selection of facilities to inspect is developed.
- Post certification inspections are conducted.

##### 5. Evaluate the Environmental Results Program Pilot

- Evaluate performance of printing sector through analysis of self-inspection checklists and follow up round of random inspections.
- Evaluate effectiveness of the ERP pilot.
- Conduct outreach to other sectors.

#### *QUARTERLY REPORTING MILESTONES AND SCHEDULE*

WDNR will prepare and submit regular quarterly and annual progress reports. Quarterly and annual reports will address the progress being made in meeting project milestones, expenditure of funds, and unexpected problems or issues that arise during project development. The table below outlines the anticipated quarterly milestones to be achieved during the three-year project.

	<b>PERFORMANCE-BASED EMS PERMIT MILESTONES</b>	<b>ENVIRONMENTAL RESULTS PROGRAM MILESTONES</b>
July 2005	Select participating facilities Gather baseline data Establish interested parties group Establish multi-media team	Develop performance indicators Identify universe of sources Gather data on administrative effort for current compliance or permit activities
October 2005	Provide training on EMS to WDNR staff Provide training for interested parties group and facilities on roles and responsibilities	Develop workbook and inspection checklists Database development Develop statistical methodology
January 2006	For participating facilities establish environmental goals and measures	Conduct inspector training
April 2006	Evaluate and revise QAPP and Workplan Establish compliance methodology	Evaluate and revise QAPP and Workplan Perform baseline inspections
July 2006	Obtain data on satisfaction with new public participation process Initiate development of draft permits Identify multimedia impacts	Analyze data and revise workbooks and inspection checklists
October 2006	Issue performance-based permits Evaluate the permit review process	Prepare and provide technical assistance workshops
January 2007		Facilities conduct inspections and submit self-certification Conduct State-to-state ERP Collaboration
April 2007	Collect first round of data for pilot and control facilities and complete an initial evaluation of the EMS permit approach	Evaluate self-certifications and implement targeted follow-up activities including response to RTC plans
July 2007		Perform post certification inspections
October 2007	Collect second round of data for participating and control facilities	Prepare evaluation that compares data from post-inspections to pre-inspections and self-certifications concerning performance goals – make revisions to targeted issues and other materials as needed
January 2008	Independent project evaluation is completed.	
March 2008	Complete and submit case study report including summary of project, reductions achieved, cost analysis, problems and lessons learned.	

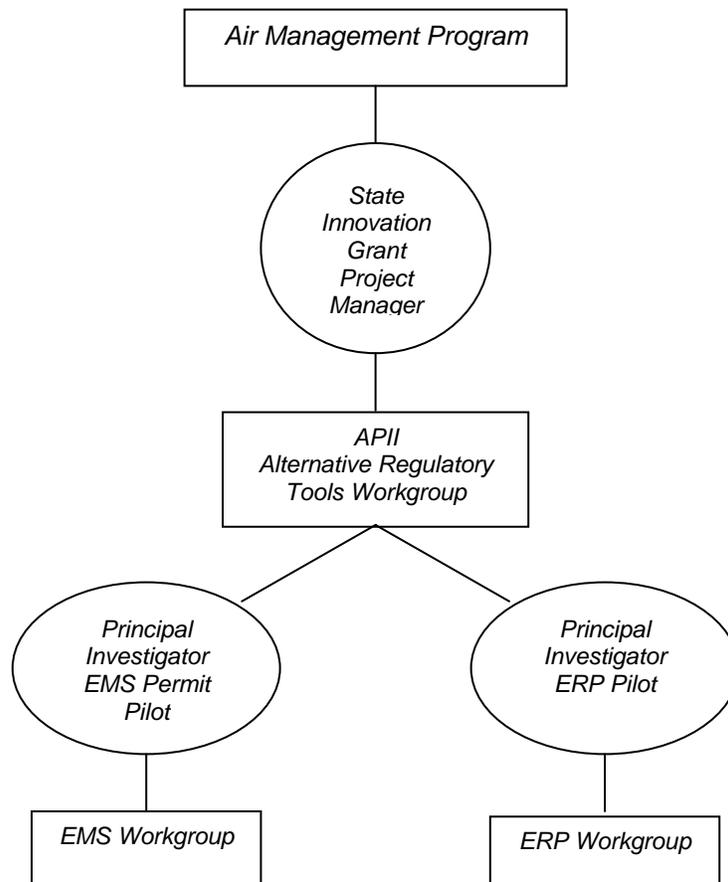
#### **PROJECT ORGANIZATION AND MANAGEMENT**

WDNR's Air Management Program is responsible for overall project management including administering grant funds, progress reporting, and ensuring quality assurance requirements are met. Below is an organizational chart that depicts the relationship between the Air Management Program, Project Manager, Principal Investigators and workgroups.

The Alternative Regulatory Tools Workgroup is one of several workgroups formed in the APII to investigate the efficiency and effectiveness of using regulatory tools other than a traditional permit. Their goal is to ascertain whether the regulatory needs of certain types of sources can be better met by different regulatory approaches. This workgroup has been specifically charged with developing three

alternatives to traditional permitting including, Performance-based Title V Environmental Management System permits, facility-wide emission rate permits, and an Environmental Results Program.

This workgroup, which includes WDNR, the WDCOMM Small Business Assistance Program, and industry, academic and environmental group representatives will guide the projects outlined in this proposal. Specific participant working groups, one for the ERP development and one to develop Title V EMS permit, will be formed to undertake the activities in the grant proposal to pilot these alternative approaches for the printing sector in Wisconsin. The working groups would include WDCOMM, WDNR, interested printing facilities and other printing organizations and associations for this project.



#### COMMUNICATION STRATEGY

WDNR has established an Internet page for its Air Permit Program Improvement project - <http://dnr.wi.gov/org/aw/air/apii/>. The ERP and Title V EMS permit projects will be included and important documents and compliance assistance tools that are developed would be featured there. A Communication Team has been established to coordinate and manage internal and external communication efforts for the Air Permit Improvement Initiative. This team is active and available to work on outreach for this proposal. WDNR plans on posting all significant documents associated with the project on the APII web pages.

WDNR is interested in the transferability of this project to other business sectors in Wisconsin and are willing to share our experience with others states to the extent resources allow and in the interest of helping others develop innovative regulatory approaches.

## *PUBLIC INVOLVEMENT*

In this proposal we are interested in improving the quality of the public's involvement in the air permit process. Particularly in the Title V EMS permit project where establishment of community groups are a feature of each pilot facilities responsibilities. In order to satisfy the Green Tier requirements, pilot facilities will establish an interested parties group. This group along with the facilities and WDNR will work to form a community-based process for permit development and environmental performance management at an appropriate level. The goal is to provide meaningful involvement and enhance communications in local communities by involving the public early on in the process of EMS permit development and on a regular basis as the EMS permit is implemented. This enhanced public involvement process is in addition to the formal notice and comment required under Title V.

A Public Involvement Workgroup is part of the APII effort and they have the responsibility for ensuring that all parties have meaningful involvement in the redesigned air permit program. Their work would also include the ERP and Title V EMS permit projects of this proposal. Their focus is on the development of improved communication and education tools including an improved web design to promote involvement and understanding of the redesigned permit program and alternative regulatory tools that are being developed in the APII.

## *PROJECT EVALUATION*

Throughout the period of the project quarterly and annual reports will be provided on the progress that is being achieved. In the third year of the project an independent organization will be retained to evaluate the project and prepare an evaluation. Their findings will be part of the final project report that will also address project performance measures and satisfaction results of all parties. The final report will be available on our web site.

## *QUALIFICATIONS*

WDNR and the Small Business Assistance Program at WDCOMM are the appropriate state agencies to develop and implement the projects in this proposal. Below are the key individuals from the participating agencies responsible for this proposal and summary of their qualifications.

### Project Manager

Jon Heinrich  
Natural Resources Program Manager  
Wisconsin Department of Natural Resources

Mr. Heinrich has thirty years experience working in the WDNR Air Management Program. This experience includes air management policy development at state, regional, national and international levels. He also has eighteen years of supervisory experience in a number of program areas including permits, enforcement, regulation and policy development, budget development and implementation, and program administration.

### Principal Investigator - Environmental Results Program

Renee Lesjak Bashel  
Small Business Clean Air Assistance Program  
Wisconsin Department of Commerce

Ms. Bashel has worked in the Small Business Clean Air Assistance Program for the past five years helping small businesses gain an understanding of the state's air regulations through outreach and communication. This includes preparation of fact sheets and direct assistance to business. She has extensive experience in organizing training seminars as well as preparing and presenting technical information in plain English. Ms. Bashel understands the Air Management Program well having been an

Air Management Engineer for eight years prior to going to the Small Business Clean Air Assistance Program. For three years at WDNR she was statewide coordinator of the operation permit program. Ms. Bashel is currently the Region 5 representative to the National Steering Committee for the Small Business Ombudsman/Small Business Assistance Programs as well as a member of their Technical Subcommittee.

Principal Investigator - Title V EMS Permit

Kristin Hart  
 Air Management Engineer - South Central Region  
 Wisconsin Department of Natural Resources

Ms. Hart has worked in the WDNR Air Management Program for the past thirteen years as an air pollution engineer writing permits and performing compliance activities. She was involved in the development and implementation of the Title V operation permit program in Wisconsin including work on a comprehensive instruction booklet for facilities and creation of permit application forms. Ms. Hart has been involved in investigating the use of principals of Environmental Management Systems to reduce benzene emissions from the foundry industry statewide. She is the lead of the Alternative Regulatory Tools Workgroup in the APII.

Green Tier

Mark McDermid  
 Director - Bureau for Cooperative Environmental Assistance  
 Wisconsin Department of Natural Resources

Mr. McDermid administers a statewide program for the development and implementation of programs for corporations to move beyond environmental compliance through pollution prevention, compliance assistance and environmental management systems. This program also develops and implements systems based tools to balance economic and environmental interests in business sectors including implementation of the state's Green Tier law that provides a legal framework for regulatory flexibility.

**PROJECT BUDGET**

The proposed budget includes funds for personnel, state-to-state collaboration training involving outside experts and staff from state programs involved in ERP development, contractual assistance for an independent project evaluation and necessary supplies.

Categories			
	Federal	State	Total
Personnel	76,560		76,560
Fringe Benefits	21,092		21,092
Travel	15,584		15,584
Equipment	0		0
Supplies	30,000		30,000
Contractual	45,427		45,427
Construction	0		0
Other	0		0
Total Direct	188,663		188,663
Total Indirect	16,337		16,337
Project Total	\$205,000		\$205,000