

# Environmental Stewardship Program – Incentives

## **Recognition and Regulatory Flexibility Incentive Guidance**

IDEM encourages Indiana regulated entities to be proactive in managing their environmental responsibilities and commit to continuous environmental improvement. In exchange for "going beyond compliance," IDEM will recognize those entities and provide certain regulatory flexibility incentives in exchange for this commitment to continuous environmental improvement through the Indiana Environmental Stewardship Program (ESP). Regulatory flexibility, an integral part of performance based environmental leadership programs, enables members to allocate limited resources towards continuous environmental improvement beyond that required by law.

IDEM is committed to providing members with tangible regulatory incentives, but in order to effectively protect the environment, benefits may not be applicable in all situations. Examples of these occasions include:

- New state or federal regulations are being issued;
- Member is a new source;
- Member does not accept benefit;
- Member's emissions or releases are near their limits;
- Complaints are received about the member; or
- Federal regulations do not allow the member to take advantage of the benefit.

This document further explains the recognition and regulatory flexibility incentives available to participants in the Indiana Environmental Stewardship Program.

## **Recognition Incentives Provided to Members**

### **Recognition Plaque or Framed Certificate Suitable for Display**

IDEM will provide members with a plaque or certificate for display purposes, recognizing the member for its participation in The Environmental Stewardship Program (ESP) or the Comprehensive Local Environmental Action Network (CLEAN).

### **Presentation of Plaque or Certificate at the Source's Location**

IDEM will provide members with a public ceremony at the participant's location to present the recognition plaque or certificate upon being admitted to ESP or CLEAN.

### **Press Release Announcing Membership**

IDEM will distribute a public service announcement to local media upon acceptance into ESP or CLEAN and will promote the new recognition within the member's community.

### **Use of Logo**

IDEM will provide members with the ESP or CLEAN logo to use on letterhead, signs, documents, and so on.

### **Recognition Letter**

IDEM will provide members with a letter of recognition from the Office of the Governor or IDEM Commissioner.

### **Annual Members Meeting with the IDEM Commissioner**

IDEM will annually provide members with the opportunity to meet with the IDEM Commissioner to discuss environmental topics.

### **Recognition at Annual Conference**

IDEM will provide members with program-specific content at the Annual Pollution Prevention Conference & Trade Show and will recognize member's efforts during the conference.

### **Networking Events**

IDEM will provide members with the opportunity to network with other program members to discuss pollution prevention successes and future initiatives.

### **Single Point of Contact**

IDEM will designate one person within the Office of Pollution Prevention & Technical Assistance to serve as the single point of contact for all environmental and IDEM related inquiries.

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## **Improved Financial Opportunity**

### **Indiana Chamber of Commerce Membership Discount**

The Indiana Chamber of Commerce is offering a 20% discount on the first year of membership, a personal visit from a member of the Government Affairs team, and a seat on one of the five environmental committees: Energy Committee, Environment and Natural Resources, Air Quality Subcommittee, Land Quality Subcommittee, or Water Quality Subcommittee. Contact Tim Brewer, Membership Director, at (317) 264-7539 or [tbrewer@indianachamber.com](mailto:tbrewer@indianachamber.com) to join the Indiana Chamber of Commerce and take advantage of this opportunity.

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## **Incentives Affecting Title 326 Air Pollution Control Board**

### **Extended FESOP Term (326 IAC 25-2-2 (a))**

The term of Federally Enforceable State Operating Permits (FESOP) for members will be extended to up to ten (10) years.

### **Extended MSOP Term (326 IAC 25-2-2 (b))**

The term of Minor Source Operating Permits (MSOP) for members will be extended to up to ten (10) years.

### **Expedited Permits**

IDEM will provide several services intended to expedite the air permitting process. This includes on-site pre-permit application meetings with the permit writer and compliance inspector and post-application meetings with members if requested or necessary. OAQ permitting staff will also attempt to contact ESP members directly by telephone when additional information is needed during the permit process. The Compliance and Technical Assistance Program (CTAP) located in the Office of Pollution Prevention and Technical Assistance (OPPTA) will also assist OAQ in this process by answering permit related questions and assisting ESP members during the application process. In support of ESP, EPA will expedite review of member permits.

### **Flexible Permit Language**

IDEM will provide members with the opportunity to operate under flexible permit conditions. Members may request a permit flexibility opportunity assessment to identify the potential for operational flexibility in their permit intended to reduce the need for future permit modifications.

### **Streamlined Permit Renewal Application Process**

Members will be eligible for streamlined application submission for renewed permits including the existing permit and only those applicable forms needed to address modifications and additions in lieu of a complete permit renewal application.

### **Reduced Reporting Frequency**

IDEM will provide members with the opportunity to submit quarterly reports semi-annually. This benefit may not apply to sources that have federal standards requiring quarterly reports. Deviations must be reported quarterly if not required more frequently.

### **Alternative Due Date for Certain Quarterly or Semi-Annual Reports**

Members will be afforded the opportunity to request alternate report due dates to IDEM.

### **Assign the Same Permit Writer**

IDEM will assign the same permit writer to a member's permits and permit modifications when feasible.

### **Assign the Same Inspector**

IDEM will assign the same inspector for a member when feasible.

### **Low Routine Inspection Priority**

Membership in ESP and CLEAN will be a consideration when selecting which sources to inspect in a given year. Members will be given a lower priority for routine inspection.

### **Advanced Announcement of Routine Inspections**

To ensure proper representation, IDEM will notify members one day prior to performing a routine inspection.

### **Alternative Compliance or Monitoring Strategies**

Members may request alternative monitoring strategies or frequencies where sustained compliance is demonstrated and sampling results remain measurably below applicable limits or where other operational parameters are in place. Members may also request alternate stack test frequencies for facilities that are steady state operations, have adequate compliance monitoring, and are substantially below applicable standards. Alternate stack test frequencies would not be available to tests required by 40 CFR Parts 60, 61, and 63. Such modifications will require a modification of the member's air permit. Both EPA and IDEM will expedite the review for these permit modifications.

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## **Incentives Affecting Title 327 Water Pollution Control Board**

### **Ability to Submit Discharge Monitoring Reports (DMRs) Annually (327 IAC 18-2-2)**

IDEM will afford members the opportunity to submit discharge monitoring reports once per year instead of monthly, provided data used to verify compliance is adequately maintained and available upon request. Instances of noncompliance or exceedance of discharge limits must be reported to the agency within 24 hours.

**Exemption from Submitting Monthly Reports of Operation (MRO) Required under 327 IAC 2-4-1 (327 IAC 18-2-3)**

IDEM will waive the requirement for members to submit monthly monitoring reports of operation under 327 IAC 2-4-1. Members will still be required by permit to report any instances of non-compliance with permit requirements or discharge limits. Members will still be required to submit the discharge monitoring reports (DMR) annually as required by 327 IAC 18-2-2.

**Exemption from Submitting Monthly Monitoring Reports (MMR) Required under 327 IAC 5-2-15(a) (327 IAC 18-2-4)**

IDEM will waive the requirement for members to submit monthly reports of operation under 327 IAC 5-2-15(a). Members will still be required by permit to report any instances of non-compliance with permit requirements or discharge limits. Members will still be required to submit the discharge monitoring reports (DMR) annually as required by 327 IAC 18-2-2.

**Flexible Permit Language**

IDEM will provide members with the opportunity to operate under flexible permit conditions. Members may request a permit flexibility opportunity assessment to identify the potential for operational flexibility in their permit intended to reduce the need for future permit modifications.

**Reduction in NPDES Permit Sampling Frequency (327 IAC 18-2-1)**

IDEM will provide members with the opportunity to reduce NPDES permit sampling frequency where sustained compliance is demonstrated and sampling results remain measurably below applicable limits.

**Streamlined and Expedited NPDES Renewal Application Process (327 IAC 18-2-5)**

IDEM will provide members with accelerated review of NPDES permit renewals when requested. Members will also be eligible for streamlined application submission for renewed permits including the existing permit and only those applicable forms needed to address modifications and additions in lieu of a complete permit renewal application.

**Expedited Drinking Water Permitting and Well Site Selection Approval**

IDEM will provide members with accelerated review of drinking water permits and well site selections when requested.

**Renewal of Existing Land Application Permit (327 IAC 18-2-6)**

IDEM will provide members with accelerated review of land application permit renewal application. Members do not need to submit land renewal application permits 180 days prior to expiration of the existing permit; however, land application permit renewals for members shall be submitted prior to expiration of the existing permit.

**Reports for the Land Application Program (327 IAC 18-2-7)**

IDEM will provide members with the opportunity to submit reports for the land application program to the agency within sixty (60) days of the last day of each calendar month for the term of the permit, as opposed to thirty (30) days for non-members.

**Assign the Same Drinking Water Permit Reviewer**

IDEM will assign the same drinking water permit reviewer to a member's permit when feasible.

**Assign the Same Drinking Water Inspector**

IDEM will assign the same drinking water inspector to member's sites when feasible.

**Assign Same NPDES Permit Writer**

IDEM will assign the same NPDES permit writer to a member's permit when feasible.

**Assign Same NPDES Inspector**

IDEM will assign the same NPDES inspector to member's sites when feasible.

**Low Priority for Routine NPDES Inspections**

Membership in ESP and CLEAN will be a consideration when selecting which sources to inspect in a given year. Members will be lower priority for routine inspections.

**Advanced Announcement of Routine Inspections**

To ensure proper representation, IDEM will notify members one day prior to performing a routine inspection.

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**Incentives Associated with Title 329 Solid Waste Management Board****Assign Same Office of Land Permit Writer**

IDEM will assign the same Office of Land permit writer when feasible.

**Assign Same Office of Land Inspector**

IDEM will assign the same Office of Land inspector when feasible.

**Low Priority for Routine Large Quantity Generator Inspections**

Membership in ESP and CLEAN will be a consideration when selecting which sources to inspect in a given year. Members will be given a lower priority for routine inspection.

**Advanced Announcement of Routine Large Quantity Generator; Small Quantity Generator; and Treatment, Storage, and Disposal Inspections**

To ensure proper representation, IDEM will notify members one day prior to performing a routine Large Quantity Generator; Small Quantity Generator; and Treatment, Storage, and Disposal inspection.