

NEW YORK STATE
STRATEGIC GOALS PROGRAM
“METAL FINISHING”

Program Framework

June 19, 2000
Version 9.1F

PURPOSE OF THIS DOCUMENT

The purpose of this document is to establish the program framework for the New York State Strategic Goals Program. The New York State Metal Finishing Stakeholders are developing an “Operating Plan and Program Document,” which will provide the details necessary to implement the New York State Strategic Goals Program (NYS SGP).

PROGRAM OVERVIEW

A Voluntary Program Aimed at Improving Environmental Performance and Reducing Costs

The National Strategic Goals Program (SGP) is a voluntary program aimed at improving environmental performance and reducing costs for participating metal finishing facilities that are in compliance with Federal, State, and local environmental performance requirements or those that are striving to achieve and go beyond compliance. By participating in the Program, a firm is committing to work towards achieving the Goals. Within the Program, SGP stakeholders will "market" the Strategic Goals, sign-up facilities to participate in the Program, provide them with information and assistance, and track their progress. The Program will be kept as simple as possible to both to participate and administer.

The guiding focus of the SGP is environmental compliance and the achievement of the national performance goals, which will ultimately help to move the metal finishing industry toward cleaner, cheaper, and smarter practices.

The program also serves as a forum in which government, metal finishers, and other participants can collaboratively and constructively address environmental issues relating to the industry. The NYS SGP is designed to serve the interests of all its participants — metal finishers, government agencies, and non-governmental public-interest organizations. The SGP can serve as a model for interacting with other industry sectors and for improving relations with specific facilities.

- Industry - should expect a number of benefits when they sign on to the program and attain the goals.
- POTW's - should expect improved regulatory compliance from participating facilities, thereby allowing them to concentrate their future compliance efforts on other industrial users of concern.
- NY State and US EPA - should expect improved compliance, improved communications and sharing of information with industry groups, individual facilities, US EPA and non-governmental organizations (NGO's) /public interest groups.
- Public Interest Groups - can learn how metal finishing facilities will improve their environmental performance cost effectively and how they will collaboratively promote a positive change in the industry and in their communities. They can take the opportunity this program presents to work together with government agencies and metal finishers in

their neighborhoods to improve health, safety and environmental performance and sharing success stories with the broader public and improving public understanding.

PROGRAM HISTORY

The NYS SGP will implement the National Strategic Goals Program, which was established by participants in the Metal Finishing Sector of the US EPA's Common Sense Initiative. US EPA, States, POTW's, the metal finishing industry and its suppliers, the environmental and environmental justice communities, and labor spent three years developing the national program through a collaborative strategic planning process. The process culminated in December 1997 when the parties unanimously endorsed and agreed to implement the program as described in the document entitled *Metal Finishing Strategic Goals Program: National Performance Goals and Action Plan* (available at www.strategicgoals.org). See Attachment A for "The National Strategic Goals Program - Environmental Goals."

Implementation of the National SGP is taking place at various levels. Some of the enabling actions involve consideration of changes in federal regulatory programs. These activities, as well as administration of a system for measuring and tracking progress towards the goals, are being implemented at the national level.

Much of the work, however, is taking place at the regional level in areas of the country where stakeholders have indicated a strong interest in developing "regional" or "State-based" SGP's. The NYS SGP is one such regional effort. From November 1998 through May of 2000 New York stakeholders met regularly to design and begin implementing the NYS SGP. See Attachment B for a list of NYS stakeholders.

PROGRAM GUIDING PRINCIPLES

The New York SGP is founded on the guiding principles and assumptions of the national program. These include:

1. The NY Stakeholders recognize the evolutionary nature of this program. In developing the programmatic aspects of the SGP, the stakeholders are creating a program that is expected to change over time based upon the feedback and experiences of the participants.
2. An EMS is seen as an integral part of any SGP program. The stakeholders group encourages and endorses the use of NYSDEC's developing EMS program. Attendance at EMS training workshops and the development and implementation of an EMS is encouraged.

3. The development and implementation of the program is to be collaborative, involving all interested and participating stakeholders on a regular basis;
4. Participation in the program is voluntary. Working together cooperatively is the most effective way for industry, government agencies, and others to identify priority environmental issues, strategies for improving environmental performance, and efficiencies in environmental regulatory programs.
5. Companies can improve their environmental performance in ways that also will improve their economic performance. The New York Stakeholders all subscribe to the “Cleaner, Cheaper, Smarter” principles of the National SGP.
6. The NYS SGP is designed to provide incremental benefits for incremental progress. The full achievement of all the National SGP Goals will take even the best metal finishers some time. The performance ladder accommodates this by setting stages of partial achievement of the national goals with established benefits at an associated level. The benefits are structured to act as inducements to participating metal finishers to make continual goal progress.

PROGRAM ADMINISTRATION AND OVERSIGHT

Administration of the Program

The New York SGP is designed to require administration at both the national and regional/state level. Initially, the administrative workload for the sign-up process and worksheet submittal is managed by the National Metal Finishing Resource Center (NMFRC). As an industrial facility elects to be placed on the performance ladder, the administrative workload transfers to the regional/state level, with the “Technical Review Board” (TRB) assuming responsibility for review and placement on the ladder. New York State DEC is responsible for convening the Technical Review Board and will assist in establishing pollution prevention and technical assistance programs.

Oversight of the Program

The multi-stakeholder group that shared in the development of the program will continue to provide oversight and define the strategic direction of the program. This group will meet at least semi-annually, and it will continue to conduct open meetings and make decisions using an informal consensus-based approach. The group will develop more formal decision-making protocols if they become necessary.

The Technical Review Board

“Operational” responsibility for the program will fall to the TRB. To the extent possible, the TRB will be composed of balanced representation from each of the following: industry, NY State DEC, US EPA, POTW’s and the environmental community. The mission of the TRB will be to:

- Refine the NYS SGP as necessary, consistent with the letter and the spirit of the process to date;
- Place/move facilities up/down on the performance ladder;
- Perform annual reviews of a facility's status on the ladder; and
- Other duties as they arise.

PROGRAM "SCORECARD"

New York's SGP participants are committing to make progress along the following National Performance Goals:¹

- 98% metals utilized on products²,
- 50% water reduction;
- 25% energy reduction;
- 90% reduction in organic Toxic Release Inventory emissions;
- 50% reduction in metals emissions to air and water;
- 50% reduction in land disposal of hazardous sludge and a reduction in sludge generation; and
- Reduction in human exposure to toxic materials in the facility and the surrounding community.

Progress in achieving these goals will be measured against a 1992 baseline.³

PROGRAM "SYSTEM"

Placement on the ladder is a function of: 1) compliance with federal state and local environmental regulations and 2) progress along the goals.

Compliance

¹ Source: "'How To' Guide for Participants," June, 1999 p.6. The NYS SGP follows all the National Goals and will incorporate any changes to these goals as they occur.

² At the October 29, 1999 National SGP Steering Group meeting, agreement was reached to examine a second alternative measure for the 98% utilization goal and allow companies to select either method of tracking progress toward achieving this goal. At the recommendation of the Steering Group, a data subgroup recently reviewed and approved the alternative measure. The 98% utilization goal can now be reached in one of two ways:

a) The 98% utilization goal is met when a facility is land disposing less than 2% of the metals it purchases (existing measurement); or

b) The 98% utilization goal is met when a facility reduces OVERALL wastewater treatment sludge generation by 50% (dry weight basis) or more from their 1992 baseline year (a new additional measurement)

³ A facility can request that performance be marked against a baseline other than 1992 if significant investments in technology were made prior to that year. The TRB will consider all such appeals individually, based on their merit.

Reports of compliance with applicable federal, state and local regulations will be verified by the TRB.

At the Bronze level of the Performance Ladder, the TRB requires a review of existing compliance inspections and self certification through checklists to fill in the gaps for any missing inspections.

If the facility requests Silver or Gold Status, it may be subject to additional inspections to verify compliance across media (and for assurance of proper placement on the ladder). For Silver and Gold levels, the TRB requires the verification of cross-media progress and performance by way of recent inspections. If a facility wants these higher level benefits and does NOT have recent enough inspections, the TRB would notify the participant that such inspections are required. SGP participants do not receive any special protection from inspections fines or penalties.

Performance

The TRB will calculate the percentage achievement relative to each and every goal listed above. The percentages will be summed and then an average will be taken. Each facility will be assigned a number between 0 and 100 percent. This percentage achievement number or “placement score” will be used to place a facility on the ladder.

The data and performance will be “normalized” against any one of a number of legitimate factors including (but not limited to) square footage of product processed, labor hours and/or revenues. All normalization data must be verifiable, supported and consistent from year to year.

THE NYS SGP PERFORMANCE LADDER

The NYS SGP is evolving and the program will include many of the benefits listed below. The New York Stakeholders have agreed to work toward making all of the listed benefits a reality – and to include other appropriate benefits as Federal, State and local laws allow.

In New York, the DEC does not have primacy for the US EPA Pretreatment regulations; therefore Region II of US EPA administers the program. POTW's that are required to comply with the Pretreatment regulations must have US EPA approved programs. Changes to a POTW's program may require approval by the US EPA. NYS DEC does, however, administer the State Pollutant Discharge Elimination System (SPDES) program for those industries that are direct dischargers to surface water or to groundwater.

It should be noted that the potential benefits in Table 1 are not guaranteed and can be tailored to any POTW's pretreatment program. Metal finishers in the program should be aware of which benefits will be available to them from their local POTW and at what levels.

**TABLE 1
BENEFITS WITHIN THE NEW YORK STATE SGP ¹**

Level	Requirements	Potential Menu of Benefits (defined in Attachment C)
Gold	<ul style="list-style-type: none"> · 100% Completion of SGP Goals or 90 % Completion of SGP Goals & the development and implementation of an acceptable EMS ²; and · No major violations or significant non-compliance in last 12 months 	<p align="center">Gold Level Recognition</p> <p align="center">Expedited permitting for new technologies (POTW only) NYS Certificate of SGP Gold Recognition NYS Governor’s Award Application Assistance (from EPA) Bronze and Silver Level Benefits and Recognition</p>
Silver	<ul style="list-style-type: none"> · 60% Completion of SGP Goals; and · No major violations or significant non-compliance In last 12 months 	<p align="center">Silver Level Recognition</p> <p align="center">M2P2 Coordination Facility-Specific EMS Training (if funding available) Reduced wastewater monitoring to Federal minimum (POTW only) Grant Application Support Bronze Level Benefits and Recognition</p>
Bronze	<ul style="list-style-type: none"> · 30% Completion of SGP Goals; and · No major violations or significant non-compliance In last 12 months 	<p align="center">Bronze Level Recognition</p> <p align="center">P2/EMS Training Workshop (if funding available) Reduced monitoring for pollutants not at the facility (POTW & Water only) Shared monitoring (POTW and metal finisher) Minimum enforcement responses for minor violations (POTW only) Local POTW Ombudsman New project startup agreement (POTW only) Priority processing of mass limits (POTW only) Sign up Level Benefits and Recognition</p>

¹ The NYS SGP is evolving and the benefits of the NY State program will continue to change as the program matures. Not all benefits will be available from each POTW in the program.

² In order for a facility to select and use this option, it must have attended state-sponsored P2/EMS training workshops & facility specific EMS Training (if established by NY-DEC) or equivalent EMS training courses deemed acceptable by the state. NYSDEC will convey to the TRB that a company has met the conditions of this EMS option. An EMS is seen as an integral part of any SGP program. The stakeholders group encourages and endorses the use of NYSDEC’s developing EMS program. Attendance at EMS training workshops and the development and implementation of an acceptable EMS is encouraged.

Initial/Sign-up	<ul style="list-style-type: none"> · Signed form; and · SGP Baseline established; and · SGP most recent year worksheet submitted 	<p style="text-align: center;">Recognition and Welcome Aboard</p> <ul style="list-style-type: none"> Technical assistance for completing w Voluntary Multi-Media Compliance Assistan Technical and Regulatory Train Small Business Self Disclosure P Elimination of duplicative sampling req Access to clearing house on grant
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PROGRAM PLAN

The multi-stakeholder group that has designed and is overseeing the New York State SGP will continually assess the extent to which the program is achieving its objectives of growing the number of participating companies and helping them make substantial progress towards the National SGP and NYS SGP goals. Program elements will be evaluated on this basis, as will any proposed additional elements.

The group will pay particularly close attention to whether the current approach to incentives and rewards for progress towards the goals by participating companies is effective. The NYS SGP currently relies heavily on the inherent — and often hidden — economic advantages to be obtained by a metal finisher achieving the environmental performance goals. The extent to which this will provide sufficient incentives for companies to participate and work to achieve the goals is unknown. The oversight group is committed to evaluating the NYS SGP Program on an ongoing basis and making changes as needed to make the program a success.

At the same time, the group recognizes that both the program as a whole and its various elements are dynamic and stakeholder driven (as is the oversight group itself). Program elements will be improved or modified over time, if experience indicates that this is necessary or desirable.

OPERATING PLAN AND PROGRAM DOCUMENT (OPPD) FOR THE NEW YORK STATE SGP

A detailed OPPD for the New York State SGP is currently under development. This document will guide metal finishers, NYS DEC, US EPA and POTW’s through the necessary steps to participate actively in the NYS SGP. The document will define in detail the necessary compliance elements, goal requirements and the necessary documentation requirements for demonstrating goal attainment. The OPPD will also provide the TRB with the tools for evaluating a participant’s movement up and down the NYS SGP Performance Ladder. The OPPD will be consistent with the national SGP principles and goals and with the NYS SGP Framework Document.

Attachment A

The National Strategic Goals Program Environmental Goals

Facility-Based Performance Goals (By Year 2002)	Sector-Wide Performance Goals (By 2002)
<p>(1) Improved Resource Utilization ("Smarter") (a) 98% of metals ultimately utilized on product.¹ (b) 50% reduction in water purchased / used (from 1992 levels). (c) 25% reduction in facility-wide energy use (from 1992 levels).</p> <p>(2) Reduction in Hazardous Emissions and Exposures ("Cleaner") (a) 90% reduction in organic TRI emissions and 50% reduction in metals emissions to air and water (from 1992 levels). (b) 50% reduction in land disposal of hazardous sludges and a reduction in sludge generation (from 1992 levels). (c) Reduction in human exposure to toxic materials in the facility and the surrounding community, clearly demonstrated by actions selected and taken by the facility. Such actions may include, for example, pollution prevention, use of state-of-the-art emission controls and protective equipment, use of best recognized industrial hygiene practices, worker training in environmental hazards, and participation in a Local Emergency Planning Committee.</p> <p>(3) Increased Economic Payback and Decreased Costs ("Cheaper") (a) Long-term economic benefit to facilities achieving Goals 1 and 2. (b) 50% reduction in costs of unnecessary permitting, reporting, monitoring, and related activities (from 1992 levels), to be implemented through burden reduction programs</p>	<p>(4) Industry-Wide Achievement of Facility Goals. (a) 80% of facilities nationwide achieve Goals 1 - 3.</p> <p>(5) Industry-Wide Compliance with Environmental Performance Requirements. (a) All operating facilities achieve compliance with Federal, State, and local environmental performance requirements. (b) All metal finishers wishing to cease operations have access to a government sponsored "exit strategy" for environmentally responsible site transition. (c) All enforcement activities involving metal finishing facilities are conducted in a consistent manner to achieve a level playing field, with a primary focus on those facilities that knowingly disregard environmental requirements.</p> <p><i>Note: At facilities where outstanding performance levels were reached prior to 1992, the percentage-reduction targets for Goals 1(b) and (c) and 2(a) and (b) may not be fully achievable, or the effort to achieve them may not be the best use of available resources. In these instances, a target should be adjusted as necessary to make it both meaningful and achievable. See the discussion of these Goals in the National SGP implementation document at www.strategicgoals.org)</i></p>

¹See Footnote 2, page 5

to the extent that such efforts do not adversely impact environmental outcomes.	
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Attachment B

The New York State Strategic Goals Program Stakeholder Participants

NAME	ORGANIZATION	CITY
Adam R. Saslow	Consensus Solutions, Inc.	400 Perimeter Center Terrace NE Suite 900 Atlanta, GA 30346-1260
Abdelsadek, Fawzy Dr.	NYSDEC R2	47-40 21 st Street Long Island City, NY 11101
Benson, Robert	US EPA Headquarters	401 M Street SW Mail Code Washington DC 20460
Brancato, Paul	MAMF – President	
Buchanan, Wyatt	C.H. Thompson	89 Eldredge St. Binghamton, NY
Cassoni, John	Precious Plate, Inc.	2124 Liberty Drive Niagara Falls, NY 14304
Chamalian, John	MAMF-NY	48-09 25 th Avenue Long Island City, NY 11103
Colbert, David	Onondaga County	650 Hiawatha Blvd West Syracuse, NY 13204
Craner, Fran	NYSDEC – Division of Air	50 Wolf Road Albany, NY 12233-3254
Cukrovany, Dick	NYSDEC – Division of Water	50 Wolf Road Albany, NY 12233-3506
Florczyowski, Michael	Anoplate Corporation	459 Pulaski St Syracuse, NY 13204
Gomes, Diane	USEPA – R2	290 Broadway, 21 st Floor New York, NY 10007
Green, Michael		
Harvey, Pat	US EPA R2	290 Broadway, 21 st Floor New York, NY 10007
Heckler, Phil	NYC DEP	96-05 Horace Harding Expressway – 2 nd Fl Corona, NY 11368
Higdon, Jeff	Victoria Plating	650 Tiffany St Bronx, NY 10474
Jodoin, John	General Superplating	5762 Celi Drive East Syracuse, NY 13057
Karet, Jack	Keystone Corporation	2929 Main St.

		Buffalo, NY 14213
Knapp, Bruce	NYSDEC – Division of Solid and Hazardous Materials	50 Wolf Road Albany, NY 12233-7252
La Grotta, Robert	NYCDEP	96-05 Horace Harding Expressway – 2 nd Fl Corona, NY 11368
Looby, Joe	NYSDEC – Division of Environmental Enforcement	50 Wolf Road Albany, NY 12233-5500
Lucia, Dennis	NYSDEC – Pollution Prevention Unit	50 Wolf Road Albany, NY 12233-8010
McDowell, Bob	Goals Achievement	54 West Ave. Fairport, NY 14450
Menczel, Jehuda	US EPA R2	290 Broadway, 21 st Floor New York, NY 10007
Morgan, GP	TCMF	
Nadler, Larry	NYSDEC – Division of Solid and Hazardous Materials	50 Wolf Road Albany, NY 12233-7251
Reagan, Jim	NYSDEC – Pollution Prevention Unit	50 Wolf Road Albany, NY 12233-8010
Reiter, Harry	Monroe County DES	444 East Henrietta Road, Bldg 15 Rochester, NY 14620
Rios, Jacqueline	USEPA – R2	290 Broadway, 21 st Floor New York, NY 10007
Southwell, Woody	General Superplating	5762 Celi Drive East Syracuse, NY 13057
Wells, Michael		
Werner, Mary	NYSDEC – Pollution Prevention Unit	50 Wolf Road Albany, NY 12233-8010
Wong, Virginia	USEPA - P2	290 Broadway, 21 st Floor New York, NY 10007

Attachment C

Definition of Terms used in Table 1

Note: these definitions are not 100% finalized, but for the purpose of the framework document, they will provide a conceptual idea of what the benefit deals with.

INITIAL/SIGNUP

Recognition on Goals Web site and Welcome Aboard Kit

The website for the Strategic Goals Program is www.strategicgoals.org.

Technical assistance for completing worksheets

From the National Metal Finishing Resource Center at www.nmfrc.org

Voluntary Multi-Media Compliance Assistance (Audits Only)

The metal finisher may conduct an voluntary multi-media compliance assistance audit to identify strengths and weaknesses in the facility's environmental controls. This will allow a facility to identify and correct any problems, qualifying them for higher-level recognition within the NYS SGP. The NYS Pollution Prevention Unit can assist the facilities in arranging these audits. If applicable the Small Business Self-Disclosure Policy may be available to the metal finisher.

Technical & Regulatory Training

Seminars and workshops can be offered exclusively or at a reduced cost (or for free) to metal finishers in the SGP Metal finishers. SGP participants can be provided information on known affordable technology and systems that work to reduce waste volumes or waste concentrations. NYS DEC has developed a multi-media audit/checklist to assist facility managers in self-determining compliance. NYSDEC has also conducted a series of workshops to help metal finishers improve the efficiency of their operations. These workshops are designed to help industry reduce wastes generation and learn about the environmental regulations that apply to them.

Small Business Self Disclosure Policy

NYS DEC has developed a small business Self-Disclosure Policy (dated 8/12/99) (for qualified small businesses), that establishes a process for adjusting civil penalties where small businesses detect, voluntarily disclosure and expeditiously correct certain violations discovered through environmental audits or compliance assistance. The DEC will eliminate the gravity component of any payable penalty where small businesses satisfy criteria (i.e., use of qualifying audit program or compliance assistance; good faith effort to promptly disclose and expeditiously correct all violations; and have an acceptable compliance history.) The economic benefit portion of the penalty will not be waived if significant. The policy shall not apply to intentional wrongdoing or significant threats to health, safety or the environment. Small business means any business independently owned and employ 100 or fewer

individuals. The policy also discusses factors that may be relevant when assessing penalties for violations self-disclosed by entities of all sizes.

Elimination of Duplicative Sampling Requirements

Many POTW's have local limits for metals and other pollutants. These local limits often are enforceable at the point where a facility's sewage enters the public sewer. (Often denoted as end of pipe or main house trap). Metal finishers have categorical discharge limits for metals and other pollutants that are enforceable at end of the plater's process, which is denoted as the end of the process. This can result in multiple sampling points and duplicative sampling requirements for both the POTW and metal finisher. The POTW should determine if it can translate the main house trap/end of pipe limits to the end of process sampling point, thereby eliminating the duplicative sampling requirement.

BRONZE LEVEL

Recognition for Bronze Level

Recognition locally, statewide and by EPA will be initiated as metal finishers achieve the Bronze Level. Recognition can be in the form of certificates, media focus, etc. Acknowledgment for achievement can come from the local POTW, NYSDEC, US EPA and trade groups.

P2/EMS Training Workshops (if funding available)

Training workshops will be held statewide to teach metal finishers about pollution prevention and Environmental Management Systems (EMS). Workshops will identify pollution prevention opportunities for metal finishers and the elements of an EMS, the benefits of implementing an EMS and provide materials to assist attendees in the development and implementation of an EMS at their facility. This benefit may be dependent on funding being obtained by NYS.

Reduced Monitoring for Pollutants not at the Facility (POTW and metal finisher)

As a metal finisher meets the Bronze Level of achievement, self-monitoring analyses can be limited to only those parameters actually used on the premises, except for those parameters that are still required by federal regulations to be sampled. NOTE: EPA has a proposed rule dated July 22, 1999 40 CFR Part 403, Streamlining the General Pretreatment Regulations for Existing and New Source of Pollution. Upon adoption of this "Streamlining" initiative, all pollutants not actually used on premises can be deleted from sampling requirements.

Shared Monitoring

POTW's may coordinate with metal finishers to meet semi-annual sampling requirements. One form of coordination that will be considered is to require metal finishers to install and operate automatic samplers. POTW's will collect samples from the automatic samples at a frequency necessary to ensure compliance. The POTW will analyze a minimum of samples necessary to meet semi-annual requirements. The cost of analysis will be borne by the POTW. The cost and maintenance of the sampler will be borne by the metal finisher.

Minimum Enforcement Responses for Minor Violations (POTW only)

Metal finishers that have achieved the Bronze Level requirements can have minimum enforcement responses for minor violations. This remains true as long as the metal finisher promptly fixes the violation to the satisfaction of the regulatory agency.

Local POTW Ombudsman

In an attempt to improve communication and reduce misunderstandings the POTW may appoint an Ombudsman to consider appeals from metal finishers related to NOV's or other directives of the POTW.

New Project Startups (POTW only)

In an attempt to encourage new processes, lines or other methods of manufacturing that will help attain national goals, POTW's and DEC will use enforcement discretion if exceedance occurs during start-up. The start up period will be pre-approved by appropriate regulatory agencies. It will include any and all conditions required to ensure no impact on the POTW or the environment.

Priority Processing of Mass Limits (POTW only)

The US EPA Streamlining Proposal includes the flexibilities of a POTW to amend a metal finishers categorical discharge limits from a concentration based limit to a mass limit. Such an amendment will be a valuable tool for enabling a metal finisher to implement water conservation measures while still maintaining compliance with applicable categorical discharge limitations. Upon finalization of the US EPA regulatory change, the POTW will give priority to review requests for amendments of discharge permits to allow for mass based discharge limits in lieu of concentration based limits for Strategic Goals Program Bronze Level participants.

SILVER LEVEL

Silver Level Recognition

Recognition locally and statewide will be initiated as metal finishers achieve the Silver Level. Recognition can be in the form of certificates, media focus, etc. Acknowledgment for achievement can come from the local POTW, NYSDEC, US EPA and trade groups.

M2P2 Coordination

A Silver Level metal finisher can request the option of a yearly multimedia inspection, saving staff time and resources. At no time will this preclude additional inspections by individual programs, as the program deems necessary to carry out program requirements (e.g., responses to complaints).

Facility-Specific EMS Training (if funding available)

Facility-specific EMS training will be conducted to help Silver Level facilities develop and implement an EMS. It is envisioned that training will be conducted at the facility one-on-one. Training will: 1) train

facility management; 2) assist in the development of the EMS; 3) assist in the implementation of an EMS. This benefit may be dependent on funding being obtained by NYSDEC.

Reduced Wastewater Monitoring to Federal Minimum (POTW only)

When the metal finisher meets the requirements of the Silver Level, self-monitoring for metals plated at the facility can be reduced to the federal minimum. The metal finisher would have the option of using the shared monitoring (see Bronze Level) or provide for self-monitoring, combined with annual POTW monitoring.

Grant Application Support

NYSDEC and USEPA will review Silver Level metal finishers grant applications and will provide a letter of support for those projects they support.

GOLD LEVEL

Gold Level Recognition

Recognition locally and statewide will be initiated as metal finishers achieve the Gold Level. Recognition can be in the form of certificates, media focus, etc. Acknowledgment for achievement can come from the local POTW, NYS DEC, US EPA and trade groups.

Expedited Permitting for New Technologies (POTW only)

For major modifications that a metal finisher may make to the facility, such as adding another sampling location or process line, the discharge permit would need to be modified. For metal finishers at the Gold Level, permits could be issued within 30 or 60 days from submission of an application. Minor modifications could be made by the facility at any time. The POTW should be notified on a timely basis.

NYS Certificate of SGP Gold Recognition

New York State will recognize Gold Level recipients by issuing a certificate of recognition.

NYS Governor's Pollution Prevention Award Application Assistance (from EPA)

Assistance will be provided to metal finishers who wish to apply for the NYS Governor's Pollution Prevention Award. Assistance in completing the NYS application will be provided by EPA.