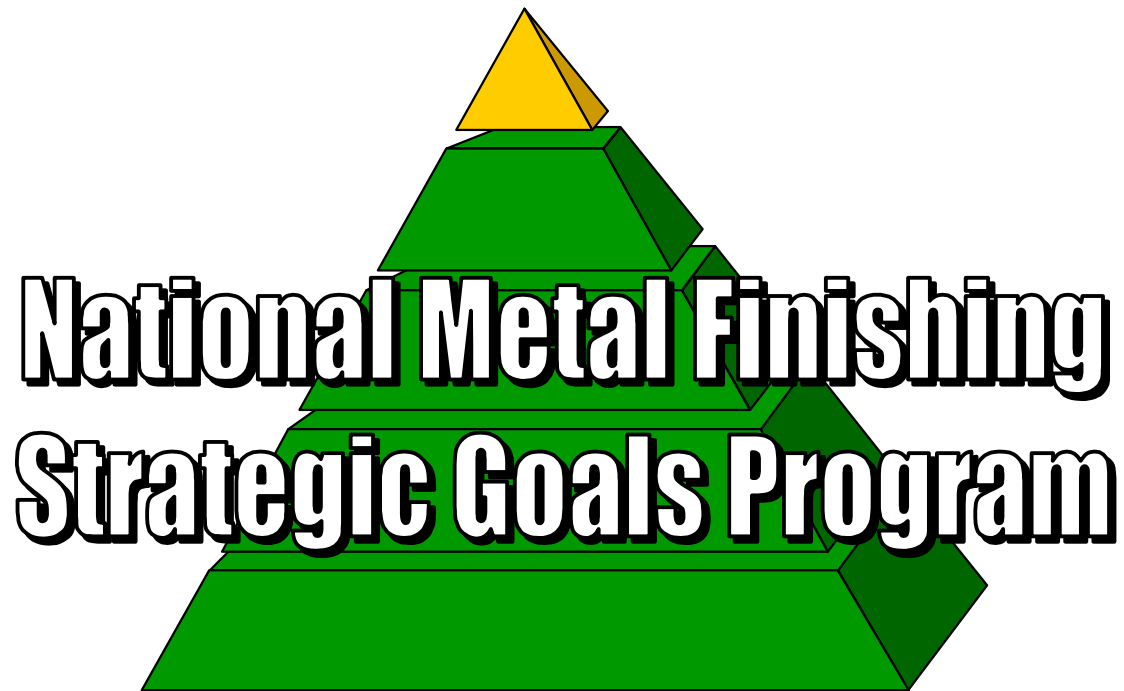


# ***Implementing the Program***



## ***"How To" Guide for Participants***

June 1999 Edition



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# I. Introduction

## Introductory Note

The end of the Strategic Goals Program's first year has offered the stakeholders an opportunity to assess progress and consider the direction of the Goals Program (SGP) for the coming years. Prior discussions on policy and program design issues were now taking a back seat to implementation as local stakeholder groups around the country were beginning to grapple with SGP start-up issues.

Inevitably, questions and issues on program implementation or interpretations of "core" SGP elements will arise as local SGP programs mature over the next few years. The national Metal Finishing Oversight SGP Workgroup will serve as the referral point, and ultimate arbiter, for questions concerning overall policy direction and adherence to the needed SGP elements. The national workgroup will also promote the exchange of information about successful local program experiences (i.e. performance ladder models, unique benefits), and help to identify and develop technical assistance resources (i.e. guidance and training).

One of the SGP's first technical assistance efforts comes from the initial feedback received from local stakeholders about the need for a guidance on how a stakeholder group could go about setting up and maintaining a successful Goals Program. This document is an attempt to fill that void. Beginning with a description of key themes within which the SGP was designed to operate, the Guide then moves to a series of "How To" chapters: setting up a local operating program, verifying facility results and credit for progress, and how to benchmark progress (including when to allow for facility variation in achieving a goal). The Guide closes with a description of enabling actions - most drawn from or tested through pilot projects undertaken by stakeholders - that will help participating metal finishers achieve the goals.

Above all, the various descriptions and examples in this guidance should indicate the tremendous amount of responsibility and flexibility given to a local stakeholder group under this program. Success really does depend upon meshing the "core" elements of the SGP with the specific environmental and economic needs of the local community. We hope the examples and guidance provided in the following pages stimulate your interest and commitment to building a program in your area that enables "cleaner, cheaper and smarter" environmental performance by the Metal Finishing industry.



## II. Key Themes

### Delivering the SGP Message

#### Opportunity for System Change

- A chance for ALL stakeholders to work together as partners to achieve “cleaner, cheaper, smarter” results
- A chance to pursue innovative approaches that meet the needs of *all* stakeholder groups
- A chance to lay groundwork for an alternative system of sector-based environmental protection

#### A Widely Endorsed Program

- Endorsed by the Common Sense Initiative Council and the Metal Finishing Subcommittee, representing national metal finishing trade groups, individual companies, States, POTWs, environmental NGOs, and organized labor.
- Endorsed by EPA Administrator Carol Browner and top Agency leaders.

#### A Partnership Approach

- The Strategic Goals Program is designed to be operated in partnership with all levels of government -- Federal, State, and Local (including POTWs).
- Get the local metal finishing trade association involved! As we work to phase in the various aspects of this program in each state, the local trade association should be consulted to determine local industry priorities.

#### Communication Is Vital

- The Program encourages a high level of communication between all levels of government, the regulated community, and other stakeholders. This program cannot succeed in a vacuum.
- Efforts among the regulatory partners should be coordinated to prevent redundant efforts while ensuring that all Goals Program elements are [eventually] included.

#### Flexibility, With Consistency

- Because of the very nature of this industry and the variations in the regulatory / political landscapes in each state, the Strategic Goals Program allows a certain amount of flexibility in how projects are operated.
- However, implementation actions must be consistent with core elements of the SGP.



# III. Core SGP Elements

## Introduction

**The National Metal Finishing Strategic Goals Program is a first-of-its-kind industry sector environmental stewardship program**, with voluntary “better than compliance” facility performance targets and a comprehensive, stakeholder-backed Action Plan to provide incentives, create tools, and remove barriers to the accomplishment of these goals. The SGP is a model for performance-based stewardship with industry that is an alternative to traditional command-and-control.

**The first part of the SGP establishes a set of voluntary National Performance Goals for metal finishers that represent "better than compliance" levels of environmental performance.** These ambitious targets will improve resource utilization, reduce hazardous emissions, improve economic paybacks, and reduce unnecessary compliance costs, all in keeping with an industry commitment to continuous environmental improvement. The SGP includes industry-wide goals for going beyond compliance, enforcement of chronic non-compliers, and “brownfields prevention.” Using 1992 as a baseline for measurement, participating facilities are working to achieve these goals by 2002.

**These voluntary industry goals are complemented by a broad Action Plan with commitments by all stakeholder groups to provide incentives, create tools, and remove barriers to the accomplishment of the goals.** Many parts of the Action Plan will test innovative approaches, more meaningful stakeholder involvement, customer-oriented compliance assistance and technology development, improved use of operational flexibility to achieve better environmental results, and regulatory and permit reforms that promote innovation.

The national SGP now is being phased in as facilities and government partners across the country sign-up to participate. In many areas, states and local governments are working with participating firms and other stakeholders to define the ground rules and component parts of their programs. **While local program variation is welcome and encouraged, this section of the “How To” Guide clarifies which aspects of the SGP are national in scope and not subject to change.**

*The complete content and rationale for the SGP is set forth in the program’s overview document, which was endorsed and signed by stakeholder representatives on December 16, 1997. This document is included in “Welcome Aboard” kits provided to all SGP participant companies and organizations.*

# What Local SGP's Must Have

## *Performance Goals*

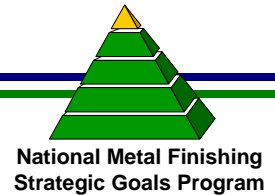
**All seven *Performance Goals* must be included.** The voluntary performance goals of the SGP provide a target for strategic planning and a yardstick against which progress can be measured. A local group cannot eliminate any of the performance goals from inclusion in its implementation of the SGP. Case-by-case determinations can be made to exempt a company from an individual goal or develop a more appropriate facility-specific target. The following seven voluntary performance targets were established in the SGP:

1. 98% metals utilized on product
2. 50% water reduction
3. 25% energy reduction
4. 90% reduction in organic TRI emissions
5. 50% reduction in metals emissions to air and water
6. 50% reduction in land disposal of hazardous sludge and a reduction in sludge generation
7. Reduction in human exposure to toxic materials in the facility and the surrounding community

### **Meaningful & Achievable Targets**

The numerical targets associated with the 7 performance-based goals were established using the collective best professional judgment of the Subcommittee and a workgroup it charged with developing them. Both the Subcommittee and the workgroup were comprised of balanced groups of stakeholders represented by professionals with expertise in metal finishing, environmental protection, and regulatory programs. These experts set out to establish "meaningful and achievable" numerical targets; targets set beyond baseline compliance levels -- beyond the level of improvement we would expect in the absence of this Goals effort -- yet not so ambitious as to discourage attempts to achieve them.

As a national program, these SGP "core" performance elements will ensure the public and metal finishers' consistency in reporting and evaluating environmental goals achievement. Furthermore, the numerical targets are designed to be generally applicable to a broad range of manufacturing processes, materials, and products; and to both job shops and captives. For the goals with percentage-reduction targets, the level of effort required to achieve them will vary markedly, depending on the level of performance a facility achieved prior to the baseline year of 1992. Determining when the Goals have been reached at a particular facility should be done in the spirit in which the numerical targets were originally developed; focusing on promoting and achieving significant continuous improvement without attempting to establish or dwell on measurements that are unnecessarily precise for these purposes.



# What Local SGP's Must Have

## ***SGP Compliance Goals***

The Strategic Goals Program established a sector wide performance goal of 100% regulatory compliance with Federal, State, and local environmental performance requirements by 2002.

*Given the sector-wide commitment to the regulatory compliance goal, individual facility reviews are necessarily a consideration -- along with achieving progress on performance goals -- for benefits awarded by the local SGP.* Local implementers should decide what elements of compliance they need to review (i.e. release and exposure data, timeliness of reporting). Individual compliance data, as well as SGP facility performance data should be used when determining appropriate benefits.

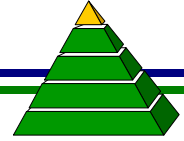
Local goals programs cannot exclude companies from joining the SGP on the basis of compliance history alone. At this sign-up point facilities can expect to receive both compliance (understanding regulations and reporting requirements) and technical assistance (audits--P2, energy, haz. waste). However, bronze level or higher performance level benefits can be withheld from facilities, even those that have achieved progress on the national performance goals, if their compliance history does not meet the expectations of the local SGP.

## ***SGP Cost-Saving Goals***

The Strategic Goals Program and Action Plan also established two additional cost-saving goals:

- (1) Long-term economic benefits for facilities achieving the environmental performance goals.
- (2) Fifty percent reduction in costs of unnecessary permitting, reporting, monitoring, and related activities, to be implemented through burden reduction programs to the extent that such efforts do not adversely impact environmental outcomes.

One of the inducements for participation by facilities in this program was the anticipation of long-term economic benefits. As local SPGs develop their programs they should remain receptive to promoting economic efficiencies for participating facilities -- as long as they don't compromise environmental quality and safety. Federal, state and local government participants also have a responsibility to continually examine ongoing operations of their regulatory programs to eliminate unnecessary burden (i.e. costs) to participating facilities.



# What Local SGP's Must Have

## *Other Mandatory SGP Components*

In addition to performance, compliance and cost-saving goals, the Subcommittee believes that there are four other “core” elements to the Program:

**2002 is the target year for facilities to meet the 7 performance goals.** While 2002 is the target year for facilities to meet the SGP goals, incentives and benefits will be available sooner as facilities make progress towards achieving the goals. Additionally, the program itself will continue beyond the 2002 target date.

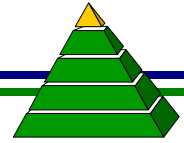
**1992 is the baseline year for measuring progress.** The Metal Finishing Subcommittee determined that 1992 should be used as the baseline against which progress shall be measured because quality data for individual facilities might not be available prior to 1992, and implementation of RCRA and effluent standards led to significant environmental improvements for this industry in the 1980s. The 1992 baseline date offer the strong potential that the goals will be both meaningful and achievable.

**A balanced stakeholder group must be established to oversee local programs.** The SGP is a multi-stakeholder effort aimed at improving the environmental performance of this industry. All stakeholders have added value to the process over the last several years of the program, and consensus was possible only by having all parties at the table. A balanced stakeholder group is therefore necessary to create a local program that meets the needs of all stakeholders involved.

**Any variation from core elements requires an assessment of the impact of the changes.** In order to be responsive to the needs of their community, local SGP stakeholders will understandably want to address unique local issues identified during the development of their local program. However, care must be taken to clearly separate efforts to deal with these unique local concerns from the core elements which are being promoted as the National Strategic Goals Program - and which are the basis for initial facility interest and willingness to participate.

Local stakeholder groups must carefully assess the impacts of any changes to the Program, both to ensure that its integrity is maintained, and to ensure that any add-on requirements will not discourage participation by the very facilities whose environmental performance needs to be encouraged. The key point is that, with an acceptably balanced stakeholder group, development of additional program components will have been adequately reviewed, debated and accepted by all participants before adoption by the local SGP.

**Variations in timing are okay; goal substitution is not.** A local SGP may also choose to emphasize the completion of some performance goals at earlier stages than others. The Statesville, N.C. program, for instance, requires an implemented program goal of 50% metals reduction in water before incentives kick in at levels 2 and 3. The substitution of local performance goals for any of the existing national performance goals is not permitted if the local stakeholders want to maintain their association with the national SGP.



# Different Program Models:

## *Program Variety Is Good*

The SGP was designed to enable local stakeholder groups to tailor the implementation of the Program to meet their needs.

*Not All local Programs will look the same.*

The SGP is being phased in throughout the U.S. at varying speeds and scope. There is significant variation among local implementation groups, depending on the number of participating companies and government agencies, resources available, and priorities. All programs will have one consistent aspect: ***Stakeholders have already determined that it is absolutely vital that a technical and compliance assistance component must be part of your initial program.***

Each participating government agency must determine how the SGP can best meet its needs, and identify how to effectively and efficiently work with the participating metal finishers within its jurisdiction -- whether through large multi-stakeholder workgroups, working one-on-one with individual companies, or some combination.

*There is no expectation that every aspect of the Goals Program can be implemented in the first year.* Develop an implementation plan that takes into account ongoing priorities, stakeholder needs, and existing programs.



# IV. Setting Up A Local Program

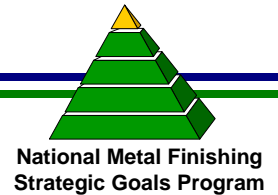
## Stakeholder Planning Groups

**The SGP is a national program implemented at the local level by a diverse group of stakeholders.** A local SGP is designed to forge a closer, more equal relationship among citizens, metal finishers, public-interest organizations, and the local, state and federal regulators responsible for environmental protection.

The National Subcommittee recommends that a successful local SGP must make an aggressive and continual effort to recruit the public, community groups, health and safety officials and the media in their efforts to identify and understand local environmental priorities. This collective understanding translates into the development of additional performance goals, incentives and rewards that are community-specific (right-to-know reporting, worker/public health and safety issues).

### **Points to Consider:**

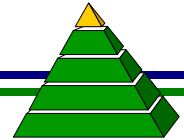
- State and regional government representatives can usually identify organizations or individuals that they have dealt with previously on related environmental or health and safety issues.
- Local POTWs and industry representatives can identify local community groups, trade associations, and members of Local Emergency Planning Committees (LEPCs).
- Regular press releases and/or community newsletters can speak to what the program does, the progress made by the program and individual facilities, and provide recognition for goals achievers.
- Local colleges and universities with environmental groups and programs that focus on environmental engineering, technical assistance, environmental justice, may be able to help.
- Communities that have established SGP stakeholder groups can also help to identify organizational and resource issues (groups to review/verify facility goals submissions, identify benefits associated with attainment of particular goals).



# Suggested First Steps

## U.S. EPA Regions:

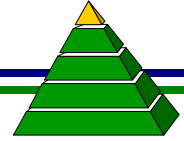
- **Step 1:** *Familiarize yourself with the Goals Program, particularly the Action Plan.*
  - ✓ Obtain copies of a Welcome Aboard Kit and related support materials.
  - ✓ Talk to the Metal Finishing Sector contacts listed throughout this document.
  
- **Step 2:** *Ensure that Regional Office managers and staff are familiar with aspects of the Goals Program that relate to their programs..*
  - ✓ Make sure that all relevant Managers (division directors and branch chiefs) are aware of the Goals Program and each of the enabling actions, and have all relevant materials.
  - ✓ Encourage them to connect with Goals Program contacts.
  
- **Step 3:** *Connect with target States and POTWs.*
  - ✓ Discuss the various roles and responsibilities for each of your regulatory partners, delivering the message set forth on the preceding page.
  - ✓ Work with State and local agencies to build understanding of the Program and its near-term and long-term opportunities, leading to their decision to participate.
  - ✓ Consider hosting a meeting with States/POTWs to discuss implementation strategies.
  
- **Step 4:** *Start to develop an implementation plan for the current year (a multi-stakeholder process).*
  - ✓ Begin by performing an inventory of existing EPA and other programs that are applicable or can be tied into the Strategic Goals Program.
  - ✓ Communicate with your regulatory partners to assess areas of greatest interest, opportunity, and relevancy.
  - ✓ Prioritize, with stakeholder input, project areas to be emphasized.
  - ✓ Create an implementation plan. Encourage incorporation of plans in EPA program MOAs and/or Performance Partnership Agreements.



# Suggested First Steps

## Participating States and POTWs:

- **Step 1:** *Sign-up! (If you haven't already)*
  - ✓ Fill out the commitment sheet, noting your primary POTW contact(s).
  - ✓ Submit the sheet to EPA with your agency director's signature.
  
- **Step 2:** *Familiarize yourself with the Goals Program, particularly the Action Plan.*
  - ✓ Obtain copies of a Welcome Aboard Kit and related support materials.
  - ✓ Talk to the EPA (HQ and Region) project contacts listed throughout this document, and the POTW representatives on the Metal Finishing Subcommittee (*see last page*).
  
- **Step 3:** *Perform an inventory of existing programs and priorities that are applicable or can be tied in to the Goals Program.*
  - ✓ Consider which project areas provide the greatest opportunity in the near future.
  - ✓ Discuss specific projects with appropriate EPA contacts.
  
- **Step 4:** *Connect with key stakeholders -- industry, your State, NGOs.*
  - ✓ Discuss the various priorities, roles, and responsibilities for each of your partners.
  - ✓ Consider hosting a planning meeting with local metal finishers and other stakeholders.
  
- **Step 5:** *Start to develop an implementation plan for the current year (a multi-stakeholder process).*
  - ✓ Begin by performing an inventory of existing EPA and other programs that are applicable or can be tied into the Strategic Goals Program.
  - ✓ Communicate with your regulatory partners to assess areas of greatest interest, opportunity, and relevancy.
  - ✓ Prioritize, with stakeholder input, project areas to be emphasized.
  - ✓ Begin to lay the groundwork for long-term Program implementation through the year 2000.



# Suggested First Steps

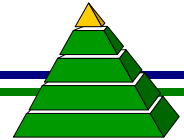
## Regional Industry Trade Groups:

- **Step 1:** *Familiarize yourself with the Goals Program, particularly the Action Plan.*
  - ✓ Obtain copies of all support materials from Goals Inc. - Welcome Aboard Kit.
  - ✓ Review the Strategic Goals website ([www.strategicgoals.org](http://www.strategicgoals.org)).
  - ✓ Talk to the Industry Project Manager about your commitment to participate.
  
- **Step 2:** *Coordinate with participating members of your group.*
  - ✓ Determine which of your members have signed up for SGP.
  - ✓ Discuss the SGP and regional concerns with them.
  - ✓ Stay informed of new industry experiences and viewpoints of SGP from National and local sources.
  
- **Step 3:** *Connect with key stakeholders- EPA, State, your local POTW, and NGOs.*
  - ✓ If your state and/or POTW have not signed up for the SGP, contact the Industry Project Manager to coordinate their sign up.
  - ✓ Get involved in the local implementation meetings when they are planned. Discuss the various priorities, roles, and responsibilities for each of your partners. Understand the next steps your company needs to take to receive rewards and benefits of the SGP in your area.
  
- **Step 4:** *Participate in Implementation Planning*
  - ✓ Serve as communication link for member firms as necessary.

# Suggested First Steps

## Facilities:

- **Step 1:** *Familiarize yourself with the Goals Program, particularly the Action Plan.*
  - ✓ Obtain copies of all support materials from Goals Inc. - Welcome Aboard Kit.
  - ✓ Review the Strategic Goals website ([www.strategicgoals.org](http://www.strategicgoals.org)).
  - ✓ Talk to the Industry Project Manager about your commitment to participate.
  
- **Step 2:** *Getting Started and Signing up for the Strategic Goals Program.*
  - ✓ Fill out the Statement of Commitment form to participate in the Goals Program.
  - ✓ Fax the signed form to the Industry Project Manager to get started.
  - ✓ Upon receipt of the “Welcome Aboard Kit”, read over the material and instructions with your key personnel to make sure they understand the voluntary commitment your company has made to meet the goals of the program.
  - ✓ Complete the 1992 Baseline Performance Worksheet within 60 days of receipt of your “Welcome Aboard Kit”. For “Captive” facilities only operations that fall under 40CFR433 should be reported.
  - ✓ Complete the Current Year Performance **Worksheet** 60 days after the Baseline worksheet has been submitted. Again, “Captive” facilities need only report operations that fall under 40CFR433.
  
- **Step 3:** *Connect with key stakeholders- EPA, State, your local POTW, and NGOs.*
  - ✓ If your state and/or POTW have not signed up for the SGP, contact the Industry Project Manager to coordinate their sign up.
  - ✓ Get involved in the local implementation meetings when they are planned. Discuss the various priorities, roles, and responsibilities for each of your partners. Understand the next steps your company needs to take to receive rewards and benefits of the SGP in your area.
  
- **Step 4:** *Develop Company Goals and Track Improved Environmental Performance.*
  - ✓ Determine the areas of improvement your Company needs to focus on to achieve the Goals of the program.
  - ✓ Create your own implementation plan on how you can improve the company’s environmental performance this year and meet the Goals in 2002.
  - ✓ Take advantage of the technical assistance offered to participants in the SGP.
  - ✓ Track the company’s current year performance against the 1992 baseline and other SGP participants on-line at the SGP website.
  - ✓ Stay informed of new SGP developments from National and local sources.
  - ✓ Achieve the Goals.



# Participation by Non-Governmental Organizations:

## *Points to Consider*

### **Why Should NGOs Participate In A Local SGP Effort?**

Through participation in the SGP, metal finishers are making a commitment to both improve their environmental performance and become better neighbors by reaching out to community residents and other stakeholders. In return, they are seeking incentives - including reduced regulatory oversight - that will assist them in achieving the goals of the SGP. NGOs need to be part of the process in order to ensure that these incentives are tied to continuous environmental improvement. do not weaken basic environmental protections. They will also want to validate goals a facility claims to have achieved in order to qualify for the benefits that have been developed. Finally, NGOs can make sure that the interests of community residents are taken into account in the design of the program.

### **What Kind Of Time Commitment Is Required?**

Most local SGP groups meet at least quarterly. Often, workgroups are established which meet in person or via conference call between meetings. An NGO's level of involvement is determined by the amount of time it chooses to devote to the SGP. Participants must be willing to work cooperatively to develop a local program that meets the needs of all the various stakeholders.

### **Is Funding Available to Support NGO Involvement?**

Unfortunately, funding is not available to compensate participants in the SGP process. While this can be a problem for NGOs, this commitment of time must be weighed against the need to be "at the table" in order to ensure that the program maintains a fair balance between relief or benefits and stakeholder commitments.

### **What Might NGOs Be Asked To Do To Help Make The SGP A Success?**

In addition to helping design the local program, NGO's may be asked to participate in other activities designed to help make the program a success. For instance, NGOs may be asked to:

- ✓ Help review the progress of participants in the SGP to determine if they have met their agreed upon goals.
- ✓ Co-host an "open house" for community residents to help them understand the metal finisher's operation and enable them to express any concerns they might have to the facility's owner/operator.
- ✓ Publicly recognize top performing metal finishers in a newsletter, on your webpage or in a press release.
- ✓ Provide metal finishers with community relations advice or technical assistance on pollution control/prevention techniques.
- ✓ Help identify facilities that have a demonstrated pattern of non-compliance.



# V. Measuring Progress

## Verification and Benefits for Meeting Goals

### Incremental Benefits/Incremental Progress

The National Metal Finishing Subcommittee developed a set of performance goals for this industry that would be both meaningful and achievable. These goals challenge participating companies to go beyond regulatory requirements to further improve their individual environmental performance.

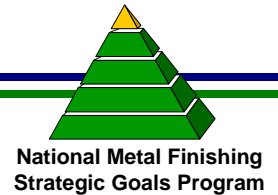
Meeting all seven performance goals may be difficult. Companies may need certain rewards for meeting initial Goals, as well as additional incentives to encourage continual progress towards achieving the remaining Goals. Therefore, the Subcommittee advocates providing incremental benefits for incremental progress to participating companies instead of holding out all benefits until a company has met all of the Goals.

### Measuring Progress

Companies submit annual performance worksheets in addition to their baseline data to demonstrate progress toward meeting the performance goals. The Subcommittee recognizes that there may be difficulties when companies do not have complete data sets, yet when local regulators need to interpret the data to determine progress made. While this document attempts to address some of the issues that have arisen to date, if you have further questions, please contact your EPA Regional or Headquarters contact or the Strategic Goals web site.

### Verification

Regulatory agencies will be offering benefits to participating companies in exchange for meeting part or all of Goals. Some form of verification may be necessary to meet the comfort level of the agencies. Verifying that a company has met some or all of the Goals can take a variety of forms. Some suggested options are described in the following pages.



# Tips for Measuring Company Progress

Progress made by companies toward meeting the performance goals rests on data submitted on the facility worksheets. A workgroup was chartered by the Metal Finishing Subcommittee to assist local stakeholders in dealing with some of the measurement issues that will arise when local groups begin to assess the data. Facility performance worksheet results are available through the Strategic Goals web site at [www.strategicgoals.org](http://www.strategicgoals.org).

## “What happens if...”:

If a company does worse from one year to the next, their progress should be considered 0 rather than as a negative.

If a goal does not apply to an individual company, such as use of organic chemicals, the goal should be considered as met.

If a company exceeds the target goal (i.e., greater than 100%), it should not receive additional credit that would offset another goal.

If a company submits more than one normalization factor, you should use the one that shows the greatest progress by the company. It has been found that using different normalizing factors (e.g., sales, labor hours, etc.) can produce different results.

## Missing Data Points:

**1992 is the preferred baseline year for comparison. If data are not available for 1992, a company should use the next closest year.** Sometimes a company may not have all the data for its baseline year. When this happens, a company should *use the next closest year of available data for that particular question on the worksheet.*

**Reminder:** The more recent the data used as a baseline, the more difficult it is to meet the goal.

# Verifying Company Progress

**What is required of a company and how progress is verified are subject to the comfort-level of the regulators and other stakeholders.** Each local stakeholder group has a varying level of comfort for what is required of companies in order to offer them benefits, as well as the degree of verification needed by the group to ensure that the companies are meeting any established criteria. When developing the MF2000 component of a local SGP program, the group should assess how much verification is reasonably needed to ensure the comfort of the group.

**The local stakeholder group should designate a verification workgroup.** This workgroup should develop a simple and efficient system to evaluate progress by those companies seeking benefits for meeting particular performance goals.

**Verification of progress should be commensurate with benefits received.** The SGP promotes a progressive framework for verifying that a company has met the performance goals in order to receive benefits. The National SGP Subcommittee recommends that as a company moves up the performance ladder and seeks to receive greater benefits at the local, state, or federal levels, the process for verifying that the goals have been met becomes more thorough. Burden on all parties should be kept to a minimum for each performance level.

**Many resource options are available for verifying company performance.** Local SGP groups should utilize non-profit technical assistance providers, local universities, and agency pollution prevention offices to assist in verifying company performance, ensuring data quality, and assisting companies in filling out the performance worksheets.

**New tools for verifying progress are under development and will be available for use by all stakeholder groups.**

# When a Company Wants Credit....

## Facility Initiates Claim for Credit

Based on the information returned in performance worksheets, the National Center for Manufacturing Sciences (NCMS--an EPA grantee) will issue annual “report cards” to each participating SGP facility. Besides a score for each of the seven performance goals, the report card will point out missing data and ask that the facility confirm the information on the card. Once the data has been verified, and if a facility believes it has achieved (or cannot achieve) one or more performance goals, **it should initiate a claim for credit by sending a letter and supporting documentation to its local stakeholder group.**

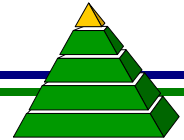
## Technical Review

**Local SGP groups should create technical review panels to allow for program variations.** Local groups may want to create technical review panels comprised of environmental agency, industry, and NGO representatives with technical knowledge of the industry. Their job would be to assess if a company should be exempt from a particular goal, based on the metal finishing process or date when major metal finishing process and waste treatment upgrades occurred. A different baseline may be applied if major upgrades occurred before 1992 and the facility is truly “best in class” as determined, for example, by the “Benchmarking Survey.” Also, a Strategic Goal may just not be applicable because of the type of metal finishing processes at the particular metal finishing facility.

**Local SGP groups have several tools for assessing company performance.** The upcoming benchmarking study for the metal finishing industry will help local technical review groups compare the performance of companies claiming that they cannot meet particular performance goals by identifying best practices and technology used throughout the industry. In the near-term, technical review groups should utilize industry experts, case studies on technology, and common sense to determine if a company should be exempt from a Strategic Goal or given full or partial credit for the goal’s achievement.

## Dealing With Pre-1992 Environmental Efforts

A number of SGP companies are seeking benefits from their local regulators based on environmental improvements made in the 1980s. While these improvements are noteworthy, they do not take the place of achievement of the Strategic Goals using a 1992 baseline. Many companies can make additional progress, but all should look for opportunities in the areas of energy and water reduction, metals utilization, sludge generation, and chemical usage. The Technical Review Panel must be convinced that either the facility is clearly a “best in class” relative to a particular goal or there is no feasible way to meet a particular goal for it to received credit. **SGP promotes continuous improvement.**



# Verification and Benefits:

## Additional Tools are Coming!

Additional resources that measure facility progress and provide guidance on evaluating credit are scheduled for completion this year by the NCMS:

An industry-sponsored **Benchmarking Survey** is under development that will establish a “best-in-class” performance level on a process-by-process basis, and indicate how these best performers got there. The primary product will be an internet/web accessible tool that includes a searchable database containing the benchmarking information. Users will be able to learn best practices, locate needed information, compare their environmental performance to other facilities, and have the ability to comment or add new information. *Expected Early 2000.*

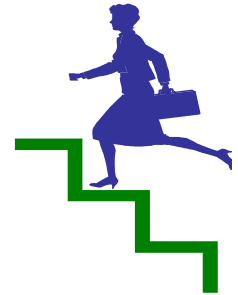
A **Technical Guidance Document** will describe the technical resources available for evaluating Goal achievement (SGP Performance Worksheet Database, Benchmarking Products, and a Best Practices Report), and will cover both standard achievement of numerical goals as well as methods for companies that demonstrate the presence of best practices, including companies that made pre-1992 environmental progress. *Expected Late 1999.*

A **Verification Guidance Document** will discuss auditing and other quality control measures that need to be implemented to ensure the credibility of the credit award process. It will include optional procedures for verifying different types of data, including wastewater discharge, sludge energy, etc. The document will also recommend sources for verification (I.e. TRI database, POTW, State RCRA database, etc.) and will provide guidance, when needed, for site visits. *Expected Late 1999.*



# VI. MF2000 Performance Ladder Framework

## Recommended Model for Rewarding Progress



The performance ladder is a concept that links incremental progress toward meeting the Strategic Goals with incremental benefits. This approach was endorsed by the National Metal Finishing Subcommittee as a way to distinguish and group the participating companies according to how much progress they have made toward meeting the Goals.

### 4 Key Elements of a Performance Ladder:

**Performance levels** – describes how many steps are on the ladder.

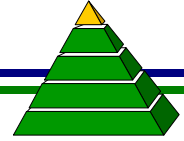
**Achievement marks** – describes the quantitative measurement of progress required at each level (e.g., number of goals achieved, percentage achieved, etc.)

**Verification** – describes the process for measuring and confirming progress for the purpose of providing benefits.

**Benefits** – describes the incentives that will be given for each level.

Local stakeholder groups have the option of using the performance ladder framework defined by the national workgroup, or developing their own system for awarding benefits associated with progress. The stakeholder group will determine what incentives are appropriate given the degree of progress, as well as determining what other criteria may be associated with the incentives.

A local group may also tie achievement of specific goals to individual benefits. For example, if metal loadings are a problem in a locality, achieving the 98% utilization goal could earn a company an extra incentive. *Benefits should be tied specifically to progress in meeting the seven performance goals as well as achieving and maintaining regulatory compliance to the satisfaction of the local SGP.*



# Two Possible Performance Ladder Models:

## *Percentage & Cumulative Approaches*

The table on the next page offers two suggested variations on a performance ladder drawn from local efforts around the country. Each one incorporates the four core elements of a ladder. Following the table, there is a more detailed comparison of the two models. The key difference between the two is the approach to determining where to set the achievement marks -- the percentage approach allows for incremental progress *within* a goal by using percent toward completion while cumulative approach uses discrete, completed goals. *These models are provided as reference tools only; local SGP programs may vary.*

**Performance Levels:** Ground level, Bronze, Silver, Gold

### **Achievement Marks for the Overall SGP:**

Cumulative approach - 2 goals = Bronze; 4 goals = Silver; 6 goals = Gold

Percentage approach - 33% goals met = Bronze; 66% = Silver; 100% = Gold

### **Verification:**

#### Bronze Level

- ✓ Self-certify
- ✓ Data screen by local regulators to check for realism
- ✓ Compliance screen by local regulators (locals determine what is “acceptable” compliance level)

#### Silver Level

- ✓ Bronze level
- ✓ Technical review panel assesses information

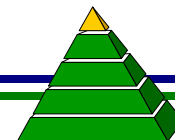
#### Gold Level

- ✓ Silver level
- ✓ 3<sup>rd</sup> party audit/on-site interview

A participating company would trigger the verification system by contacting his/her designated regulatory representative and identifying the level for which it is seeking credit verification and reward. The company would submit the appropriate worksheets to the regulator for review.

Levels are in effect for one year, unless a company requests a review. At the end of the year, the company must re-apply for the following year.

**Benefits** – See table for suggested benefits at each level of performance.



# A National Performance Ladder Model

Performance Level	Requirements		Menu of Suggested Benefits*
<b>Sign-up</b>	Signed form		Technical Assistance for completing worksheets
<b>Participating</b>	Submitted 1992 baseline worksheet Submitted most recent year worksheet		EPA certificates recognizing participation Welcome Aboard Kit Reception at AESF Week Recognition on Goals Web site and in trade press Guidance Manual training Pollution Prevention Audit Hazardous Waste Audit Energy Audit Assistance in environmental cost accounting Access to Capital financing for participants
<b>MF2000 Bronze Level</b>	<u>Percentage Model</u> 33% achievement (cumulative goals); Local review panel recommends level	<u>Cumulative Model</u> 2 goals met	Bronze level recognition Reduced monitoring for pollutants not in system Reduced lab fees Reduced notifications for changes to system Reduced pretreatment monitoring ERP modification/clarification (e.g. to develop AO's for facility environmental improvements)
	<b>Passed local compliance review</b>		
<b>MF2000 Silver Level</b>	<u>Percentage Model</u> 66% achievement (cumulative goals); Local review panel recommends level	<u>Cumulative Model</u> 4 goals met	Silver level recognition Reduced permit fees Expedited new permits and/or permit modifications Waive fines for first minor NOV Reduced monitoring to semi-annually
	<b>Passed local compliance review</b>		
<b>MF2000 Gold Level</b>	<u>Percentage Model</u> 100% achievement or recommendation by local technical review panel	<u>Cumulative Model</u> 100% achievement	Gold level recognition Expedited delisting POTW conducts monitoring for SIU (semi-annually)
	<b>Passed local compliance review</b>		

Additional possible requirements:

- 100% compliance at silver and gold levels
- EMS at gold level
- Mentoring at gold level
- Local technical review panel determines Bronze, Silver, or Gold levels

**\*This list of suggested benefits is not meant to be exhaustive. Each local program may develop additional unique benefits/incentives.**

# A Comparison of Models: Percentage & Cumulative

## Definitions of Approaches

With the percentage system, companies receive credit at four levels of achievement:

- ✓ sign-up
- ✓ 33% achievement of goals
- ✓ 66% achievement of goals
- ✓ 100% achievement of goals

Achievement is calculated by determining the percentage of achievement for each individual goal, summing over all goals, and dividing by the total number of goals. Thus, each facility ends up with a single percentage score.

To implement the ladder approach, the National Strategic Goals Program (SGP) would prepare a scorecard for each company that submits baseline and current year data. Presumably, scorecards would be prepared each year for which current year data are submitted, starting with the 1998 data. The scorecard would be generated from the SGP database. The scorecard would show, for each goal, the percentage of achievement as well as the total percentage score.

With the cumulative system, companies receive credit at four levels of achievement:

- ✓ sign-up
- ✓ meet two goals
- ✓ meet 4 goals
- ✓ meet 6 goals

## Criteria for Comparison

The following were selected as criteria for comparing the two approaches:

- Encourage environmental improvement (The selected method should encourage all companies to reduce discharges and energy use and improve worker safety aspects of their shops.)
- Simplicity (The selected method should be easy to understand. Companies should be able to calculate progress/credit for themselves.)
- Cost to implement (The verification/credit process should not drain already limited program funds.)
- Fairness (The approach should reward only those companies that have made environmental progress.)
- Account for Pre-1992 and “best-in-class” (The selected approach should have provisions to award credit for pre-1992 progress or credit for companies that are best-in-class but for technical reasons cannot meet certain numerical goals.)

# A Comparison of Models (Continued)

## Evaluation of Approaches

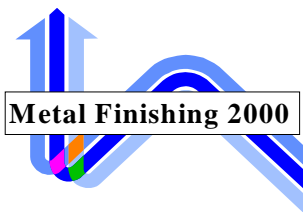
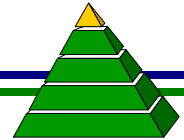
**Encourage environmental improvement.** Both systems encourage improvement by recognizing intermediate progress. The cumulative approach may discourage some companies from attempting progress on certain goals, which they feel they have no chance to fully achieve.

**Simplicity.** The cumulative approach appears to be simpler and easier to understand and calculate. Companies probably would not be able to calculate their own scores under the percentage approach; the calculations would be especially difficult if any data are missing, if there are negative values for certain goals, or if pre-1992 or best in class credits are given.

**Cost to implement.** The percentage approach is more expensive to implement because the SGP will need to look at every data point, every year, for each company which submits current year data. If a company provides more than one normalizing factor, this will multiply the required effort. Missing data will have to be addressed with the percentage approach. With both approaches, companies apply for award levels once they think that they have achieved goals. No action is necessary by the SGP until companies apply for credit. The percentage approach may result in more labor to implement than the cumulative approach.

**Fairness.** Fairness can be defined in multiple ways. Most people would probably like to see a system that minimizes subjectivity. Lots of “judgment calls” may result in negative feelings, especially if award decisions are transferred to the states and POTWs. In such a case, it may end up being easier to achieve awards in certain cities than in others. Both approaches seem fair if the rules can be fully delineated.

**Account for Pre-1992 and “Best-in-Class.”** Accounting for past progress was important enough to the Subcommittee for them to select 1992 as a baseline and to insist on future provisions for pre-1992 progress by undertaking the Benchmarking project to identify best-in-class. Therefore, it is likely that the system for awarding goals credit may take past progress into account. The cumulative approach will be at an advantage here. It is much easier to make a yes-no subjective decision than to make a percentage-type subjective decision.



Metal Finishing 2000

# Lessons Learned from Pilot Projects

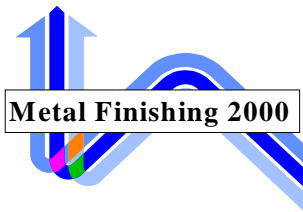
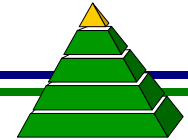
Metal Finishing 2000 (MF2000) is an important component of the SGP action plan that allows for operational flexibility and benefits for companies meeting some or all of the goals. The performance ladder models utilize the MF2000 approach, whereby benefits are given to companies as they make progress toward meeting the goals. Pilot projects in Detroit and Rhode Island developed processes for identifying meaningful incentives, criteria for receiving them, and how these benefits would be allocated. Lessons learned from the MF2000 experiences provide helpful tips for local implementation groups interested in offering incentives to participating companies.

While many of these lessons may appear intuitive/challenging. Lessons from the early stages of program development are presented under "Advance Planning and Getting Started," while later-stage lessons are captured under "Pilot Development, Implementation, and Evaluation."

## Advance Planning and Getting Started:

### *Lessons For EPA Headquarters and Regions, and State and Local Regulators*

- Lesson #1: Establish an Equal Partnership.** Ensure that participating regulators value the project as an important component of their agency's mission and are engaged in the project as equal partners *from the beginning* of the planning process.
- Lesson #2: Address Inter-Regulatory Issues.** Undertake advance planning steps to build a framework, establish rough timelines, resolve any inter-agency issues before engaging other stakeholders in a project, and consider professional facilitation at stakeholder meetings.
- Lesson #3: Link with Existing Programs and Priorities.** Integrate and leverage projects being conducted at the state and local level that either focus on metal finishers or are similar in concept to MF2000. Consider the state's ability to provide flexibility under its existing authority.
- Lesson #4: Consult with Enforcement Staff.** Discuss the project with federal, regional, and state enforcement staff early in the project's planning and development. This will help ensure that enforcement staff understand the type of flexibility the project plans to offer and that no outstanding enforcement issues will conflict with project development and implementation.
- Lesson #5: Identify Project Leaders and Key Point People.** Ensure that the project has a "champion" and leader to push the process, broker consensus, maintain communication among stakeholders, and ensure progress.



# MF2000 Lessons Learned (con't)

## Project Development, Implementation, And Evaluation: *Lessons For All Stakeholders*

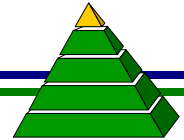
- Lesson #6: Ensure Public Participation.** Establish mechanisms for identifying and working with community stakeholders.
- Lesson #7: Identify Appropriate Qualification Criteria.** Develop application criteria for top-tier performers based on environmental performance, compliance history, worker health and safety records, and community relations.
- Lesson #8: Develop Standard Agreements.** Establish standard agreements to reduce resource costs and improve the potential for replicating the project in the future.
- Lesson #9: Monitor Progress.** Establish a process for regularly monitoring the project's progress toward "cleaner and cheaper" objectives. Evaluate the benefits and costs in a formal, standardized way.
- Lesson #10: Communicate Regularly and Remain Open to New Stakeholder Ideas.** Maintain frequent and effective communication among stakeholders in order to address differing views and ideas. Be flexible and willing to deviate from the initial plans to incorporate new ideas presented by the stakeholder group.



# VII. SGP Enabling Actions

The National Metal Finishing Subcommittee identified a series of enabling actions to address key issue areas for this industry. These enabling actions are discussed in the Strategic Goals Action Plan, which also includes specific commitments by all stakeholder groups to act in support of the Strategic Goals Program. By implementing the Action Plan, stakeholders will provide incentives, create tools, and remove barriers for metal finishers to achieve the National Performance Goals.

The following pages provide suggestions for local implementation groups about the activities that they can undertake to help participating metal finishers in their efforts to meet the Goals.



# Compliance Assistance and Research & Development

**A coordinated compliance assistance program is critical to the success of the Goals Program. This compliance assistance strategy will also bring to metal finishers quality research on environmental technologies, which is needed to achieve the National Performance Goals.**

- **National Metal Finishing Resource Center (NMFRC)** provides "one-stop" access to up-to-date information about technical and compliance-related issues that affect their operations. The Internet address of the NMFRC is <http://www.nmfrc.org>.
- **Metal Finishing Guidance Manual** serves as a plain language tool for use by shop floor managers to ensure continuing compliance with regulatory requirements.
- **National Metal Finishing Environmental R&D Plan** focuses the current research program on pollution prevention and remediation technologies that are of greatest benefit to small job shops. Current technology demonstrations focus on chrome emission reduction and zero-discharge technologies.
- **The Strategic Goals Web Site** provides tools for metal finishers and regulators participating in the SGP, including a tracking system of industry progress and progress by all participants toward assisting the industry in meeting the performance goals.

## Implementation Factors:

- Compliance and/or Technical Assistance should be the FIRST project area for development by all levels of government with metal finishing facilities and organizations (using existing assistance mechanisms wherever possible).
- Small Business Assistance offices and other assistance providers should be familiar with the Guidance Manual and NMFRC in order to encourage their use by metal finishers.
- Government assistance providers should encourage the use of low-cost technologies identified through demonstration projects developed under the R&D plan.

## Project Contacts:

**Bob Tolpa (202) 564-2337 -- NMFRC & Guidance Manual** 29  
**David Ferguson (513) 569-7518 -- R&D Plan and Technology Demonstrations**

## Access to Capital

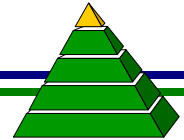


**Government and industry working together with lending and insurance institutions to establish mechanisms for metal finishers to obtain capital for environmental investments.**

The Metal Finishing Sector has led an effort to conduct an analysis of innovative ideas, such as environmental insurance and technology verification, to support loan decisions that can be of benefit across CSI's (and other) small business sectors which encounter barriers in obtaining capital for environmental improvements and site remediation.

### Implementation Factors:

- EPA and the Small Business Administration are in the final stages of developing an environmental loan (or loan guarantee) pilot program for SGP metal finishers in Southern California. Interested EPA Regions and States should contact Scott Dosick for project status updates.
- EPA sponsored an evaluation of various state P2 loan programs and policies. This report analyzes various approaches and evaluates their efficacy in reaching the target audience while achieving desired results. Contact Scott Dosick for a copy of this report or download a copy from [www.strategicgoals.org](http://www.strategicgoals.org) under *State/POTW Resources*.
- Interested EPA Regions and States should:
  - ✓ Identify appropriate “access to capital” contact persons to work with EPA and the Small Business Administration.
  - ✓ Evaluate existing financial assistance programs, and provide information to Small Business assistance offices and Brownfields coordinators.
  - ✓ Contact local metal finishing trade associations to assess their financial capital needs.
  - ✓ Contact lending and insurance institutions to determine their interest in participating in an “access to capital” program.



# Industrial Pretreatment

**Providing tools, programs, and incentives to help industrial dischargers achieve compliance more easily, to promote pollution prevention, and to help POTWs develop more effective pretreatment programs.**

In response to recommendations from the Metal Finishing Subcommittee, EPA's Office of Water is taking action to implement the following non-regulatory pretreatment and program tools:

- Move PIPES on-line information system from EPA bulletin board to an internet accessible web site
- Increase sharing of pretreatment program information
- Develop training videos for use by small POTWs
- Provide "roadmap" of available POTW guidance
- Develop cost accounting and budgeting tools for POTWs
- Provide guidance for choosing contract labs

## Implementation Factors:

- Through the Goals Program, Regions and States can develop a more cooperative working relationship with POTWs to promote proactive industrial pretreatment.
- Regions, States and POTWs can develop more systematic methods for sharing pretreatment program information in order to reduce management costs.
- Pretreatment coordinators and inspectors can develop training videos for use by small POTWs.
- Pretreatment coordinators can identify and develop cost accounting and budgeting tools for POTWs.
- Regions and States can provide guidance to delegated authorities for choosing contract labs.
- Regions and POTWs can work with delegated States to change statutes and/or regulations to allow for flexibility consistent with CWA streamlining changes.
- EPA Regions and States can actively market pretreatment program reforms and tools.

# Tier 3 Environmentally Responsible Site Transition

## Developing a government sponsored exit strategy for potential Brownfield sites through preventive measures and targeted assistance.

Tier 3 metal finishers are old and outdated shops who desire to transition their facilities -- out of business, to a new owner, or to a new location. The “Brownfields Prevention” component of the Goals Program calls on all levels of government to create a “National Exit Strategy” which will enable owners of Tier 3 facilities to work with their regulatory agencies to clean and transition their sites in an environmentally responsible manner.

## Implementation Factors:

- Federal, State, and local Brownfield coordinators and RCRA enforcement partners should work with owners of Tier 3 facilities who wish to exit the business to identify chemicals and potential problems on-site.
- Region and State Goals Program contacts should review materials that have been prepared by the CSI Metal Finishing Subcommittee on the Tier 3 issue, as well as site-transition manual developed for Rhode Island metal finishers by EPA Region 1.
- Federal, State, and local Brownfield coordinators and RCRA enforcement partners should identify other available tools that can be provided for small industrial facilities.
- Work with POTWs and local fire departments to identify facilities/sites which appear likely to be (or already have been) abandoned.
- If Tier 3 facilities are unwilling to act responsibly, conduct a RCRA inspection and make the owners aware of the criminal and financial penalties for abandonment.

# Tier 4 Targeted Enforcement

**Developing a partnership-based targeted enforcement program that identifies Tier 4 firms and takes appropriate action against them.**

Tier 4 firms are the “rogue” facilities who operate without the knowledge of any level of government. Tier 4 also applies to the “chronic non-compliers” who demonstrate an unwillingness to bring their facilities into consistent compliance.

## Implementation Steps:

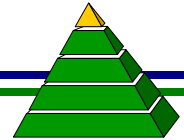
- The EPA Region conducts an internal meeting among the various media enforcement divisions to evaluate existing enforcement tools, and review data on compliance history.
- The EPA Region sponsors a meeting with Regional and participating State enforcement staff to select a target municipality or area based on environmental performance of the industry or locality.
- This combined enforcement team contacts and meets with the local government representatives of the municipal area(s) to determine project responsibilities.
- The government team holds a meeting with representatives of the local and/or national metal finishing trade associations *before beginning the project* in order to gain support and explain the project.
- A sample work assignment that details an approach being tested in Detroit, MI is available from the EPA/OECA project contact listed below.

## The SGP Approach -- Industry As a Partner

- This project is not an “enforcement sweep” of the metal finishing industry.
- How can industry be a supportive partner in an enforcement project? By providing:
  - ✓ names and addresses of Tier 4 facilities and/or customers of Tier 4 facilities
  - ✓ insights on tools that Tier 4 firms use to escape enforcement attention
  - ✓ the mechanisms by which Tier 4 firms obtain customers and plating chemicals
  - ✓ feedback on the industry’s perception of current enforcement strategies

**EPA Project Contact: Kurt Lamber (202) 564-4009**

**OECA Policy Contact: Bob Tolpa (202) 564-2337**



# Facility Audits

## CLEAN-P2

**Combining pollution prevention assistance and enforcement relief policies to create incentives for improved environmental performance by metal finishers.**

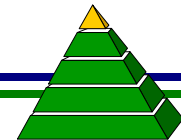
CLEAN-P2 is currently being piloted in EPA Region 1 -- New England. The project has two main elements:

- Promote the use of facility pollution prevention audits as a means of encouraging AND achieving superior environmental performance.
- Use the existing EPA Audit and Small Business Assistance policies as incentives for participation by metal finishers.

### Implementation Factors:

- Contact the individuals listed below for information on the New England CLEAN-P2 pilots and EPA's Audit and Small Business policies.
- Regional and State P2 coordinators and (if appropriate) small business assistance offices should catalog existing state facility assessment, audit programs, and audit statutes.
- Regional and State P2 coordinators and (if appropriate) small business assistance offices should look for links to these existing programs.
- Regional and State agencies should identify environmental and community groups for participation in State-based CLEAN-P2 pilots.

**CLEAN-P2 Contact: Mark Mahoney (617) 918-1842**  
**OECA Policy Contact: Bob Tolpa (202) 564-2337**



# Reporting Reform

## The Regulatory Information Inventory & Team Evaluation Program (RIITE)

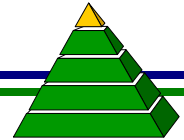
**Using Business Process Reengineering (BPR) to identify consensus-based reporting reforms that reduce regulatory burden while improving access to information.**

The RIITE Program approach applies BPR to federal, state, and local reporting requirements for metal finishers across all environmental media. RIITE has prompted proposed changes in pretreatment and waste reporting regulations. The RIITE Program also developed the following items:

- **The RIITE Toolbox** is an information management tool containing BPR methodologies and software, EPA and federal policies, forms design, and many other tools for State agency use to streamline environmental reporting. **Arizona & Texas projects** are underway to implement streamlining recommendations.
- **Electronic Reporting** pilots are testing the submission of pretreatment, Manifest, and facility profile data via the Internet to feed into rulemakings and EPA's electronic policy.
- **Implementation Studies** in Arizona and Texas that demonstrate cost savings from RIITE improvements.

### Implementation Factors:

- Interested States and POTWs should review materials on RIITE processes and lessons, and evaluate how they might further ongoing initiatives for streamlining and electronic reporting.
- States receiving EPA "One Stop" grants are particularly promising candidates for use of the RIITE Toolbox.
- States and POTWs should look at RIITE recommendations for ideas on offering reporting flexibility incentives in their local Strategic Goals Programs.



# RCRA Waste Minimization and Recovery Projects

## Promoting environmentally responsible reduction and disposal of metal finishing wastes.

The goals of these projects are to: (1) characterize F006 sludges generated today through information collection and analysis and (2) promote pollution prevention and environmentally sound recycling through cleaner, cheaper, and smarter regulatory approaches. As an enabling action to help industry achieve the Strategic Goals, EPA's Office of Solid Waste published a proposed rule in the February 1, 1999, *Federal Register* to extend the current 90-day hazardous waste accumulation requirements as a means to reduce barriers to metals recovery. The national benchmarking study of F006 waste will also lead to stakeholder consideration of possible changes in the RCRA F006 regulations.

## Implementation Factors:

- Extending the 90-day accumulation time is deregulatory; therefore, many states may need to change their statutes in order for it to become effective.
- EPA and State RCRA inspectors should be told of the upcoming change and notify metal finishers who generate hazardous waste.
- Small business assistance offices should be notified of the changes to the rule in order to provide information to their customers.
- Regional and State waste officials should monitor the progress of the F006 benchmarking study and subsequent regulatory dialogue.

**EPA Project Contact for RCRA Benchmarking: Kristina Meson (703) 308-8488**



# VIII. General SGP Contacts

## EPA HQ

Bob Benson  
Metal Finishing Program Manager  
(202) 260-8668

Scott Dosick  
National Implementation Coordinator  
(202) 260-9211

Mindy Gampel  
National Policy Coordinator  
(202) 260-2748

Janet Murray  
Editor, Goals-at-a-Glance  
(202) 260-7570

Carl Koch  
Guidance Tools Project Manager  
(202) 260-2739

## Industry

Bob McDowell  
Surface Finishing Industry Council  
Industry Program Contact  
(716) 425-7500

Christian Richter & Al Collins  
Surface Finishing Industry Council  
Government Affairs Committee  
(202) 965-5190

George Cushnie  
Strategic Goals Web Site  
(703) 264-0039

## Web Sites

<http://www.strategicgoals.org>

<http://www.epa.gov/sustainableindustry>