

STATE OF NEW JERSEY

METAL FINISHING

STRATEGIC GOALS PROGRAM

Program Description

DRAFT
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Version 4.2

PURPOSE OF THIS DOCUMENT

The purpose of this document is to establish the program framework for the Strategic Goals Program in the State of New Jersey. The New Jersey Metal Finishing Stakeholders may ultimately develop an “Operating Plan and Program Document,” which will provide the details necessary to implement the New Jersey Strategic Goals Program (NJ SGP).

This document and, in fact, the implementation of the NJ SGP are evolutionary in nature. The document has been crafted with the knowledge that it will change in the short, mid and long term. But it will change only through a collaborative process with all stakeholders agreeing on its evolution.

PROGRAM OVERVIEW

The NJ SGP is a voluntary, multi-stakeholder program aimed at improving environmental performance and reducing environmental compliance costs at metal finishing facilities. At its core are a set of environmental performance goals for metal finishers and a set of “enabling actions” other stakeholders will undertake to help metal finishers achieve the goals. (See Attachment A).

Metal finishing companies participate in the program by signing up (there is no fee), working to achieve the goals, and submitting annual worksheets to the National Center for Manufacturing Sciences (which operates the National Metal Finishing Resource Center (NMFRC)) summarizing their progress. In return, government and other participants sign up (again, no fee) and agree to work collaboratively with these companies; providing technical assistance, access to capital for companies otherwise unable to get it, expedited or simplified regulatory procedures (where possible), and public recognition.

The guiding focus of the National 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, 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 NJ 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. They can improve their environmental performance AND get a competitive edge through the development and use of environmental management systems tailored to the needs of metal finishing shops, new material substitution and conservation technologies. As time passes, those who may otherwise have difficulty obtaining capital for environmental equipment may be able to do so – or receive benefits

for installing such technologies. In time, participating companies will benefit from any proposed regulatory modifications that will reduce compliance costs.

- Government Agencies and Publicly Owned Treatment Works (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. They can learn about the metal finishing industry and how it can best improve environmental performance in ways that also improve their competitiveness. Agencies may identify and implement changes in reporting and permitting that will save staff time and other resources.¹ Agencies may also coordinate the inspection processes with other government entities so as to create regulatory efficiencies.
- Public Interest Groups - can learn how metal finishing facilities are striving to improve environmental performance in their communities. They can take the opportunity this presents to work with metal finishers on improving environmental performance and sharing success stories with the broader public.
- NJ Department of Environmental Protection (NJ DEP) – should see a crossover effect in their Silver and Gold Track Programs for Environmental Performance (“Track Programs”). As metal finishing facilities achieve gains in environmental performance, the numbers of facilities eligible for these programs will, naturally increase thus providing NJ with dual successes.
- Utilities - Water, electric and gas companies provide technical and administrative support and economic incentives towards participant's energy and water reduction goals. Utilities can share economic benefit and public recognition of improved environmental performance.

PROGRAM HISTORY

The NJ SGP will implement the National Metal Finishing Strategic Goals Program (National SGP), which was established by participants in the Metal Finishing Sector of the US EPA Common Sense Initiative. These parties — US EPA, States, POTWs, 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)

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, as well as

¹ Recent efforts by NJ DEP to develop a “General” Air Permit were supported by public/private collaboration and cooperation.

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” SGPs. The NJ SGP is one such regional effort. Over the past year, New Jersey stakeholders have been meeting regularly to design and begin implementing the NJ SGP.

A map illustrating where these programs are evolving nationally is presented as Attachment C.

PROGRAM GUIDING PRINCIPLES

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

1. The NJ Stakeholders recognize the evolutionary nature of this program. Aside from 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. That the points of convergence with the NJ Track Programs will bring these together with the SGP. All stakeholders will work collaboratively to overcome the points of divergence. Although the SGP is directed at the Electroplating and Metal Finishing industry, it is complementary to the New Jersey Track Programs. Interested companies can participate in and receive recognition from both programs;
3. The development and implementation of the SGP is to be collaborative, involving all interested stakeholders, including the environmental community, on a regular basis;
4. Participation in the SGP is voluntary. Working together cooperatively is the most effective way for the industry, government agencies, and others to identify priority environmental issues, strategies for improving environmental performance, and efficiencies in environmental regulatory programs;
5. The SGP will address issues specific to each of four “tiers” of metal finishers; top-performers (Tier 1), companies that are in or near compliance (Tier 2), companies transitioning out of the business (Tier 3), and companies that do not intend to comply with environmental laws (Tier 4);
6. Companies can improve their environmental performance in ways that also will improve their economic performance. The New Jersey Stakeholders all subscribe to the “Cleaner, Cheaper, Smarter” principles of the Common Sense Initiative as well as the goals of the Track Programs;
7. Incremental benefits for incremental progress. The full achievement of all the National SGP and the New Jersey Track Program Goals will take even the best metal finishers some time. The performance ladder process contained in the SGP is designed to accomplish this by setting stages of partial achievement of the national goals and regional compliance concerns with established benefits at an associated level. Since the SGP can lead directly to the Gold and Silver Tracks, the benefits are structured to continually act as inducements to make continual progress.

PROGRAM ADMINISTRATION AND OVERSIGHT

Administration of the Program

The New Jersey SGP is designed to require some administration at BOTH the national level AND the regional/state level. In the early stages, the administrative “burden” is national. The sign-up process is centralized and worksheet submittal activities are managed by the NMFRC. Later, there is a transition to state-based administration with a multi-constituency, stakeholder panel responsible for review and placement of facilities on the ladder.

Further, various participating organizations have taken on responsibility for aspects of regional program implementation. US EPA Region 2 has been taking the lead organizing meetings and working to assure balanced stakeholder representation. New Jersey DEP will develop a NJ SGP website which provides information for and recognition of participating entities. New Jersey DEP and the local POTW (if it has a State delegated pretreatment program) will share responsibility for verifying the compliance history of participating facilities. NJ Technical Assistance Program (NJTAP – part of the NJ Institute of Technology) will take the lead in establishing pollution prevention and technical assistance programs. Of course, industry will take responsibility for achieving the goals and reporting their progress. The principles that will promote success for the SGP apply equally to the New Jersey Track Programs.

Oversight of the Program

The multi-stakeholder group that has developed the NJ SGP will continue to provide oversight and have responsibility for defining the strategic direction of the program. This group will meet at least quarterly for the foreseeable future. It can also coordinate its activities with New Jersey Track Programs. It will continue to conduct open meetings and make decisions using an informal consensus-based approach.

The Stakeholder Review Panel

“Operational” responsibility for the NJ SGP will fall to the Stakeholder Review Panel (SRP). In the ideal scenario, a balanced SRP will be comprised of representatives from each of the following: Industry, NJ State DEP, US EPA, the POTW’s and the environmental community. The mission of the SRP will be to:

- Refine the NJ SGP as necessary, consistent with the letter and the spirit of the process;
- Place facilities on the performance ladder and move them up or down over time;
- Perform annual reviews of a facility’s status on the ladder;
- Coordinate appropriately with the New Jersey Track Programs;
- Other duties as they arise.

PROGRAM “SCORECARD”

SGP participants are committing to make progress toward the following National Strategic Goals:²

- 98% metals utilized on products;³
- 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 baseline⁴.

PROGRAM “SYSTEM”

Placement on the ladder is a function of progress along the goals and compliance.

Performance

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

Facilities will report their progress to the SRP when they elect to be placed on the performance ladder and annually thereafter. The SRP will evaluate performance across each of the seven goals based upon the percent of the goal achieved. Feedback between the SGP and New Jersey Track Programs oversight panels will serve to improve both programs. See Example 1 in Attachment D.

The SRP will calculate the percentage achievement relative to each and every goal listed above. A facility will be assigned a percentage number BETWEEN negative infinity and positive

² Source: “‘How To’ Guide for Participants,” June, 1999 p.6.

³ 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 achieved 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).

⁴ A facility can “appeal” to mark performance against a baseline other than 1992 if significant investments in technology were made prior to that year. The SRP will consider all such appeals on their merit.

infinity.⁵ A facility can be penalized for backsliding, though it can receive extra credit for overachieving. The percentages will be summed and then an average will be taken. This will yield a percentage achievement number or “placement score” which will be used (in concert with compliance data) to place a facility on the ladder. Please see Example 2 in Attachment D.

Compliance

Compliance with applicable federal, state and local regulations will be verified by the SRP (and also by the New Jersey Track Programs). To minimize confusion, both programs should be reviewed to coordinate the various levels of success.

At the Bronze Level of the Performance Ladder, the SRP requires self-certification (through checklists) to fill in the gaps for any missing inspections. A compliance self-audit should not reveal any serious compliance violations.

If the facility requests Silver or Gold Status, it is with the realization that it may be subject to additional inspections to verify compliance across media (and only for assurance of proper placement on the ladder). For Silver and Gold levels, DEP requires the verification of cross-media progress and performance by way of recent inspections or audits by third parties (as defined by the SRP). If a facility wants these higher level benefits and does NOT have recent inspections, the SRP would notify the facility that it would have to request an inspection(s) first from whatever program(s) had not inspected the facility recently. The facility could then decide if it wanted to get an inspection, prepare for the inspection and take advantage of any possible enforcement discretion since they were requesting the assistance. Currently, there is no enforcement discretion for any actual inspection conducted by NJ DEP or US EPA.

⁵ A facility will be assigned a percentage number BETWEEN negative infinity and positive infinity. This policy differs from the National Program guidance (“How To” Guide for Participants, June 1999 Edition), which states that percentages should be between zero and one hundred. The NJS GP stakeholder group has taken the national guidance into consideration, but determined that only allowing for percentages of zero to one hundred would hinder greater industry participation.

THE NJ SGP PERFORMANCE LADDER

Participants in the development of this program have recognized that the benefits that might be given to exemplary facilities under today's laws may be different than those that may be provided under tomorrow's laws.

Thus, the list of benefits includes items that can be given to industry today as well as benefits that might be provided as time goes on. These latter benefits are listed in *italics*.

The NJ SGP program as of the date of this document is captured in Table 1 below:

**TABLE 1
 NEW JERSEY STRATEGIC GOALS PROGRAM**

Level	Requirements	Menu of Possible Benefits
Initial/Sign-up	<p>Signed form</p> <p>SGP Baseline established</p> <p>SGP most recent year worksheet submitted</p>	<p>Public recognition from EPA, NJ DEP and POTW</p> <p>Welcome aboard kit</p> <p>Technical assistance for completing worksheets provided by NJ TAP</p> <p>Free (for credit) graduate student interns from NJ TAP who are familiar with the SGP goals and worksheets will be available to assist participating companies to plan and measure achievement of the goals</p> <p><i>Discounted access to workshops and technical training coordinated by NJ TAP with support and involvement from EPA's Pollution Prevention staff as well as NJ DEP. These workshops will focus on pollution prevention, regulatory compliance and process improvements (related to environmental gains).</i></p> <p>Hazardous Waste/P2/Energy Evaluations by NJ TAP</p> <p>Access to capital: Loans of up to \$150,000 are available to participating metal finishers for purchasing Pollution Prevention (P2) equipment. Available at all levels as well as startup. The higher the level, the higher the loan maximum or lower the interest rate.</p> <p>Environmental Management System (EMS) template and training An EMS template designed for small and medium sized metal finishers is available to SGP participants, as are workshops on how to customize and implement an EMS (if funded by EPA or the State).</p> <p>DEP/EPA Certificate for appropriate levels achieved</p>

Level	Requirements	Menu of Possible Benefits
Bronze	<p>30% Completion of SGP Goals</p> <p>No serious violations or significant non-compliance for preceding six months</p>	<p>Bronze level recognition</p> <p><i>Tax credits for Pollution Prevention Investments</i></p> <p><i>Utility (water, wastewater and energy) rate reductions for environmental improvements</i></p> <p>Reduced wastewater monitoring requirements for pollutants NOT at the facility for parameters regulated at the local limit</p> <p><i>A system for a DEP Relationship Manager (at a specified phone number) who becomes the single point of contact and coordinator for the facility.</i></p> <p><i>Reduced wastewater monitoring to quarterly.</i></p> <p><i>Slight reductions in fees where appropriate</i></p> <p>Initial/Sign Up Level Benefits and Recognition</p>

Level	Requirements	Menu of Possible Benefits
Silver	<p>60% Completion of SGP Goals</p> <p>No serious violations or significant non-compliance in preceding year</p>	<p>Silver level recognition</p> <p><i>Expedited review of permit applications by the permitting authority</i></p> <p>Reductions in NJ Hazardous Waste reporting requirements to the extent that regulations allow</p> <p><i>With federal, state and local approval, application of discretionary authority (via dialogue with senior regulators) for fines, penalties and remedial actions</i></p> <p><i>Greater reduction in fees where appropriate</i></p> <p><i>Pollution Prevention Technology Program: Limit modifications through pre-emptive ACO for air, water and waste.</i></p> <p>Bronze and Initial/Sign Up Levels of Recognition and Benefits</p>

Level	Requirements	Menu of Possible Benefits
Gold	<p>100% Completion of SGP Goals</p> <p>No serious violations or significant non-compliance for preceding two years</p>	<p>Gold level recognition</p> <p>Expedited permit renewals</p> <p><i>Reduction in NJ Hazardous Waste Manifest Fee</i></p> <p>Reduced inspection frequency to mandatory federal minimums</p> <p><i>Reduced wastewater monitoring to semi-annual</i></p> <p><i>Greatest reduction in fees where appropriate</i></p> <p>Silver, Bronze and Sign Up Levels of Recognition and Benefits</p>

PROGRAM PLAN AND MILESTONES

The multi-stakeholder group that has designed and is overseeing the New Jersey SGP will continually assess the success of the program in achieving its objectives; increasing the number of participating companies and helping them make substantial progress towards the 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 NJ SGP currently relies heavily on the inherent — and often hidden — economic advantages of 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 this 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); it will evolve in the direction deemed best by those involved at any given time.

Specific milestones the oversight group has established include:

1. An annual increase of 25% in the number of participating companies for the first five years, then an annual increase of 10% of the remaining eligible companies, until 75% of eligible companies are participating;
2. All participating companies submitting their worksheets annually to the NMFRC;
3. All government agency and other (non-metal finisher) participants submitting a brief description of their contributions to the SRP annually; and,
4. A jointly prepared annual report from the New Jersey SRP showing progress on the part of participating companies towards achieving the goals and progress on the part of participating government agencies in reducing costs relating to the regulatory process. This report might also include affected legislative changes that would improve participation and produce further success toward meeting the SGP or New Jersey Track Program goals.

These tasks will ensure that the program remains viable, progressive and responsive as time goes on. If the program fails in any or all of these areas, it will become readily apparent.

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")</p> <ul style="list-style-type: none"> (a) 98% of metals ultimately utilized on product. (b) 50% reduction in water purchased / used <i>(from 1992 levels)</i>. (c) 25% reduction in facility-wide energy use <i>(from 1992 levels)</i>. <p>(2) Reduction in Hazardous Emissions and Exposures ("Cleaner")</p> <ul style="list-style-type: none"> (a) 90% reduction in organic TRI emissions and 50% reduction in metals emissions to air and water <i>(from 1992 levels)</i>. (b) 50% reduction in land disposal of hazardous sludges and a reduction in sludge generation <i>(from 1992 levels)</i>. (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>(3) Increased Economic Payback and Decreased Costs ("Cheaper")</p> <ul style="list-style-type: none"> (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 <i>(from 1992 levels)</i>, to be implemented through burden reduction programs to the extent that such efforts do not adversely impact environmental outcomes. 	<p>(4) Industry-Wide Achievement of Facility Goals.</p> <ul style="list-style-type: none"> (a) 80% of facilities nationwide achieve Goals 1 - 3. <p>(5) Industry-Wide Compliance with Environmental Performance Requirements.</p> <ul style="list-style-type: none"> (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><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 at www.strategicgoals.org</i></p>

Attachment B

The New Jersey Strategic Goals Program Stakeholder Participants

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Attachment C
The Strategic Goals Program
What's What Across the Nation

Attachment D

Calculating Facility Performance and Placement on the Ladder Examples of Each

Example 1:

Facility X used 10,000,000 Kilowatt Hours (kwh) in 1992. The National Goal implies that once normalized, energy usage must be 7,500,000. In 1999, Facility X reports normalized energy use of 8,000,000 kwh – a 20% reduction and 80% of the achievement of the goal.

Facility X gets credit for 80% along this criterion.

Example 2:

Placement on the ladder is based on an average achievement rate. Facilities “score” their progress as indicated above. They then add and average their performance across the seven goals.

Goal	Score
98% metals utilized on products	15.0%
50% reduction in water use	150.0%
25% reduction in energy use.	80.0%
90% reduction in organic Toxic Release Inventory emissions;	25.0%
50% reduction in metals emissions to air and water;	0.0%
50% reduction in land disposal of hazardous sludge and a reduction in sludge generation;	-25.0%
Reduction in human exposure to toxic materials in the facility and the surrounding community	90.0%
Average and “Placement Score”	47.9%

Attachment E

A Sampling of Permit Fees and Other Charges Imposed on the Metal Finishing Industry

AGENCY	DEFINITION OF PERMIT FEE	FREQUENCY
STATE	Air pre-construction permit stack test	once
“	RCRA, Hazardous waste handling	annual
“	Permit evaluation fee, air	once
“	Fee to bring NOV action	every time
“	Waste manifest fee	every time
“	Solid waste report fee	annual
“	NJPDES NODI	annual
“	Lab Fee to permit reading pH meter	annual
“	Initial Air Permit Application	5- year
“	Hazardous waste audit	annual
“	Air permit application	once
“	Air permit renewal	5 year
“	Air permit modification	once
“	NJ hazardous waste generator's report	annual
“	NJDOT haz mat fee	annual
“	Application for renewal, water	annual
“	Closure inspection	once
“	Com'l haz waste handler, not TSD	annual
“	Delisting inspection	as needed
“	compliance review	annual
“	Stormwater permit	annual
Local	Fire Dept. for gas cylinders	annual
“	POTW supplemental, water	annual
“	POTW sewer connection	once
“	POTW Sewer permit	5 year
“	County Health, (boiler)	annual
“	Municipal Fire Dept Hazardous facility permit	annual
“	POTW for BOD, TSS, etc.	annual
“	Annual life Haz Waste registration	annual
“	Building use registration	annual