

2006 Air Innovation Conference

The Environmental Results Program (ERP)

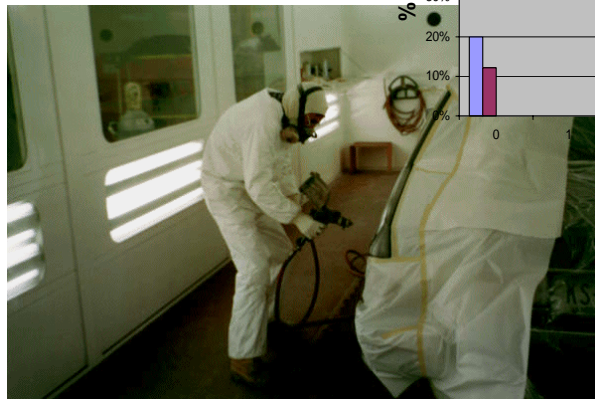
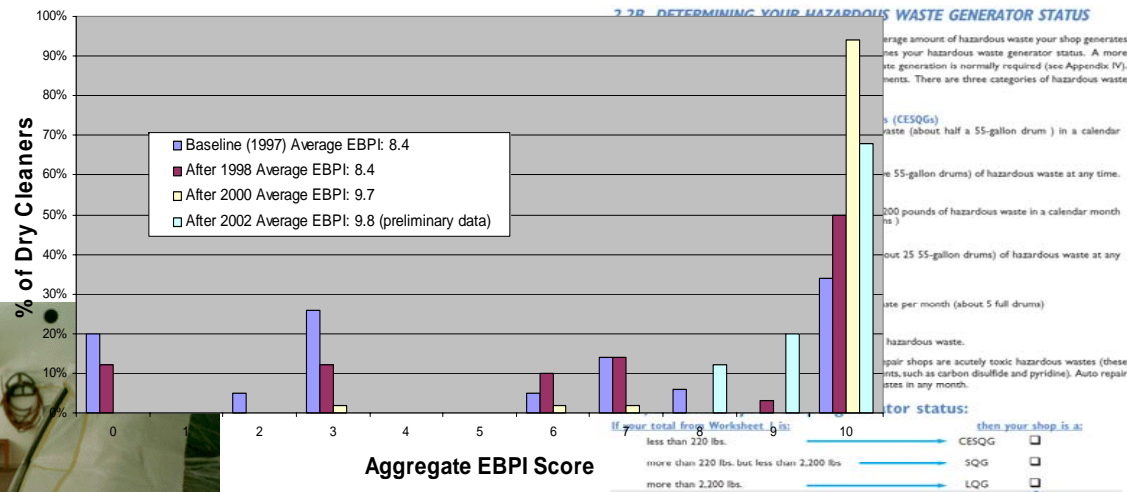
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Dry Cleaners EBPI Performance Trends 1997-2002



2.2b. DETERMINING YOUR HAZARDOUS WASTE GENERATOR STATUS

average amount of hazardous waste your shop generates determines your hazardous waste generator status. A more site generation is normally required (see Appendix VI). There are three categories of hazardous waste generators:

- Small Quantity Generator (SQG)
- Very Small Quantity Generator (VSQG)
- Large Quantity Generator (LQG)

Examples of hazardous waste thresholds:

- VSQG: 220 lbs. of hazardous waste (about half a 55-gallon drum) in a calendar month
- SQG: 2,200 lbs. of hazardous waste (about 5 55-gallon drums) at any time
- LQG: 22,000 lbs. of hazardous waste (about 50 55-gallon drums) at any time

Repair shops are acutely toxic hazardous wastes (these include carbon disulfide and pyridine). Auto repair shops are normally required to generate hazardous waste in any month.

Generator status:

If your total from Worksheet 6 is:	then your shop is a:
less than 220 lbs.	CESQG <input type="checkbox"/>
more than 220 lbs. but less than 2,200 lbs.	SQG <input type="checkbox"/>
more than 2,200 lbs.	LQG <input type="checkbox"/>

CAPP QUESTION 3a

This is your generator status. Record it in question #3a on the Compliance Certification Form.

What to do next:

- If you are always a CESQG, use Chapter 3 to help fill out the Compliance Certification Form.
- If you are ever a SQG, use Chapter 4 to help fill out the Compliance Certification Form. You must have an EPA ID number—see Appendix VI.
- If you are ever a LQG, please contact your nearest FDEP district office listed on the back cover. This Workbook is not intended for LQGs. The FDEP district office will provide you with appropriate information and assistance.

ALL REPAIR SHOPS

2.2b Hazardous Waste

Why ERP?

Regulated Universe

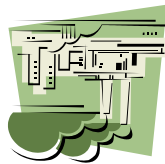
Massachusetts Bureau of Waste Prevention

Monitor Air Quality

Quantify chemical use, pollution, and waste

Regulate facilities and other sources

Promote reuse, recycle, and source reduction



- 30,000+ small, 1000 medium and 300 large sources
- 300 waste management facilities

- 4 million+ vehicles and associated transportation infrastructure

- Use and disposal of consumer products by 6.3 million people and thousands of businesses

Why ERP?

Issues for Regulators

- How do you effectively and efficiently regulate large groups of facilities or activities with limited resources?
- How do you know that your compliance assurance efforts (permits, inspections, compliance assistance, enforcement, etc.) are yielding environmental performance improvements?

Why ERP?

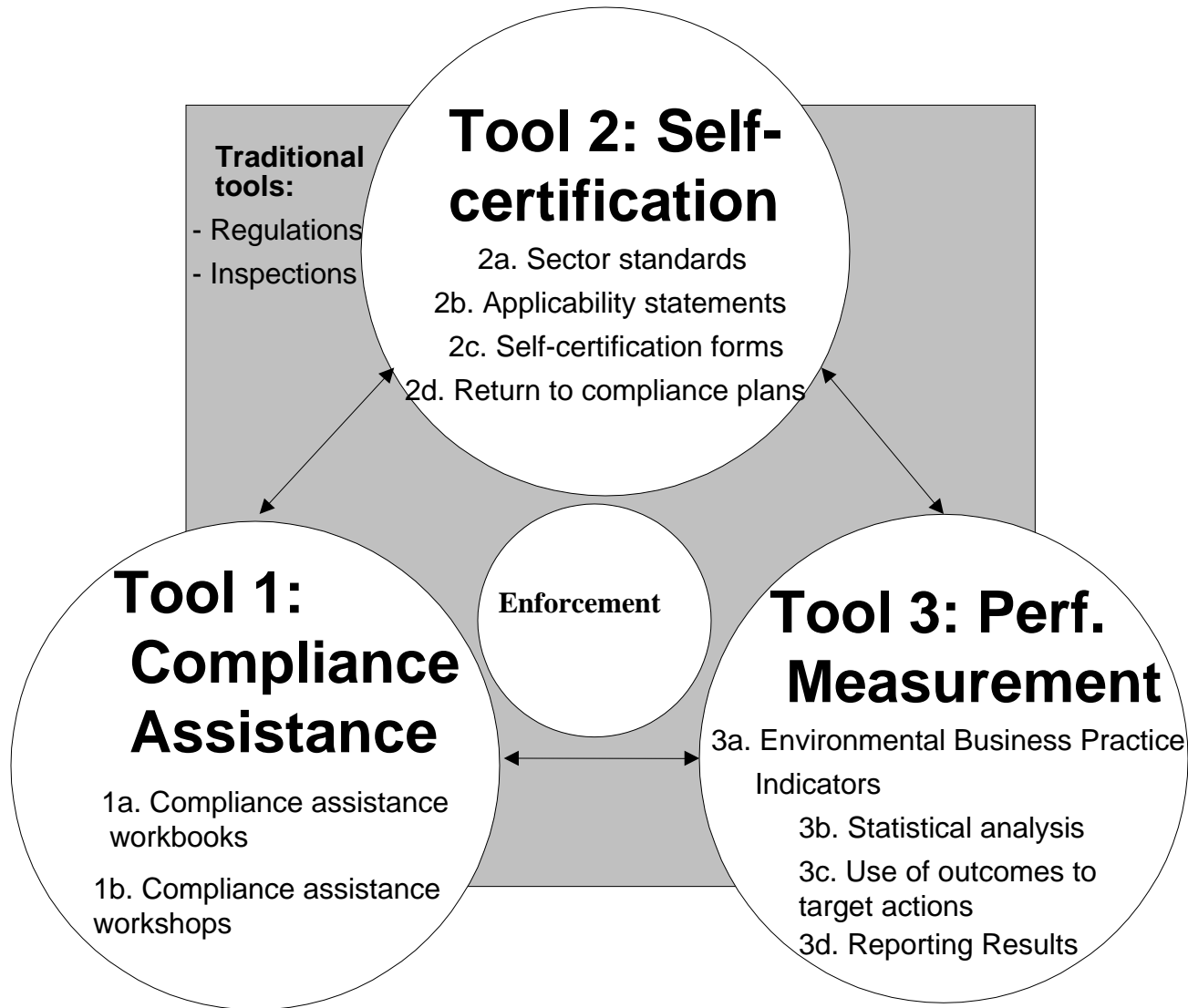
MA in 1996

- Recognition that numerous small sources cumulatively create significant environmental impacts
- Builds on MA's successful multi-media, pollution prevention based approaches
- Can include less prescriptive, performance-based approaches
- Offers better ways to measure regulated community and agency performance

What is ERP?

- Integrated system of compliance assistance that encourages P2 , self-certification, and statistically-based measurement.
- Performance standard/certification replace case by case permits
- Whole industry sector based: multimedia and P2
- Compliance Assistance (clear standards, workbooks, workshops)
- Inspections and enforcement (targeted and random)
- Measurement and evaluation

The ERP Approach



Environmental Results

Environmental Business Practice Indicators (EBPIs)

MA ERP Printers

- Regulatory Indicators
 - Are the fountain solutions used on offset web-fed lithographic presses alcohol-free? (air)
 - Printer meeting 2ppm or hauling? (water)
 - Is the facility in compliance with quantity and time limits for HW storage? (waste)

- Beyond Compliance
 - Does printer have a sign prohibiting discharge of process chemicals over sinks in work areas? (P2)
 - Does printer recycle aluminum printing plates? (P2)

Versatility of Data

Stage II Goals and Measures 1997-2005

- Compliance strategy based on ERP Approach
- Program goal: 9000 tons of VOCs controlled by 3000 fuel dispensing facilities (95% vapor capture efficiency)
- Baseline: 1997 only 54% of facilities had submitted required vapor system test results. Over 90% field non-compliance
- Program revisions: annual certification, weekly operator inspections, systematic reporting, enforcement and field inspections presence by MA DEP
- Under revised program, facilities submitting test results accounted for 2.65 of 2.7 billion gallons of motor fuel dispensed annually. 98% of facilities had certified to passing tests
- In 2005, 8825 tons of VOC demonstrated under control vs. 4860 tons in 1997

Versatility of Data

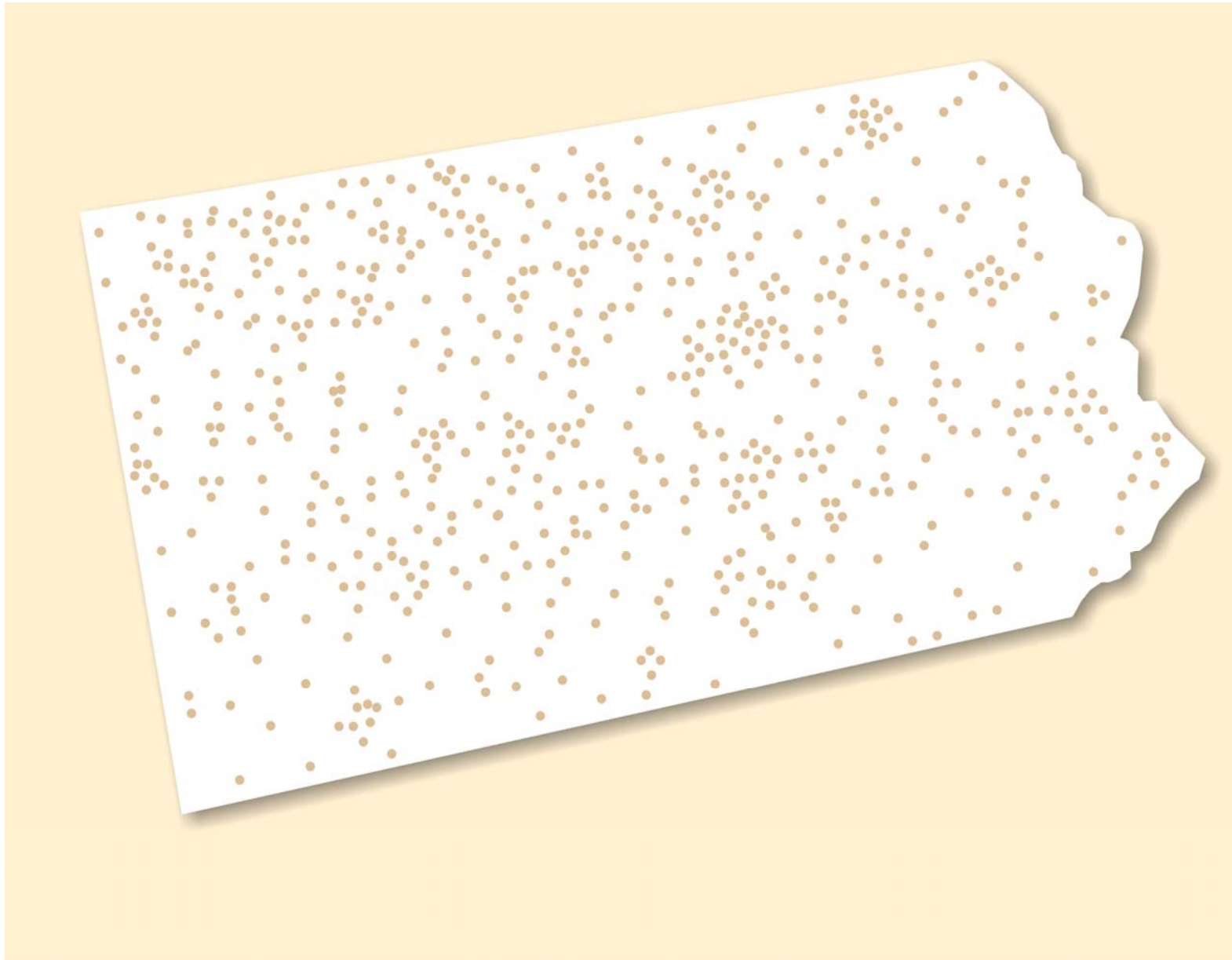
Select Environmental Outcomes

- *Question:* “Are you in compliance with the press cleanup solution requirement?”
- *Results:* Performance increased **from 77%** at baseline in 1998 to **85%** in 1999. Apply this to entire universe, this is equivalent to **4.0 tons VOC reduction**
- *Question:* “Is leak detection performed weekly, following workbook protocol and using proper leak detection equipment?”
- *Result:* Performance increased **from 33%** at baseline in 1997 to **66%** in 2000. Based on avg. perc use per facility, applied to entire universe, this is equivalent to **22.5 ton reduction** of perc emissions.

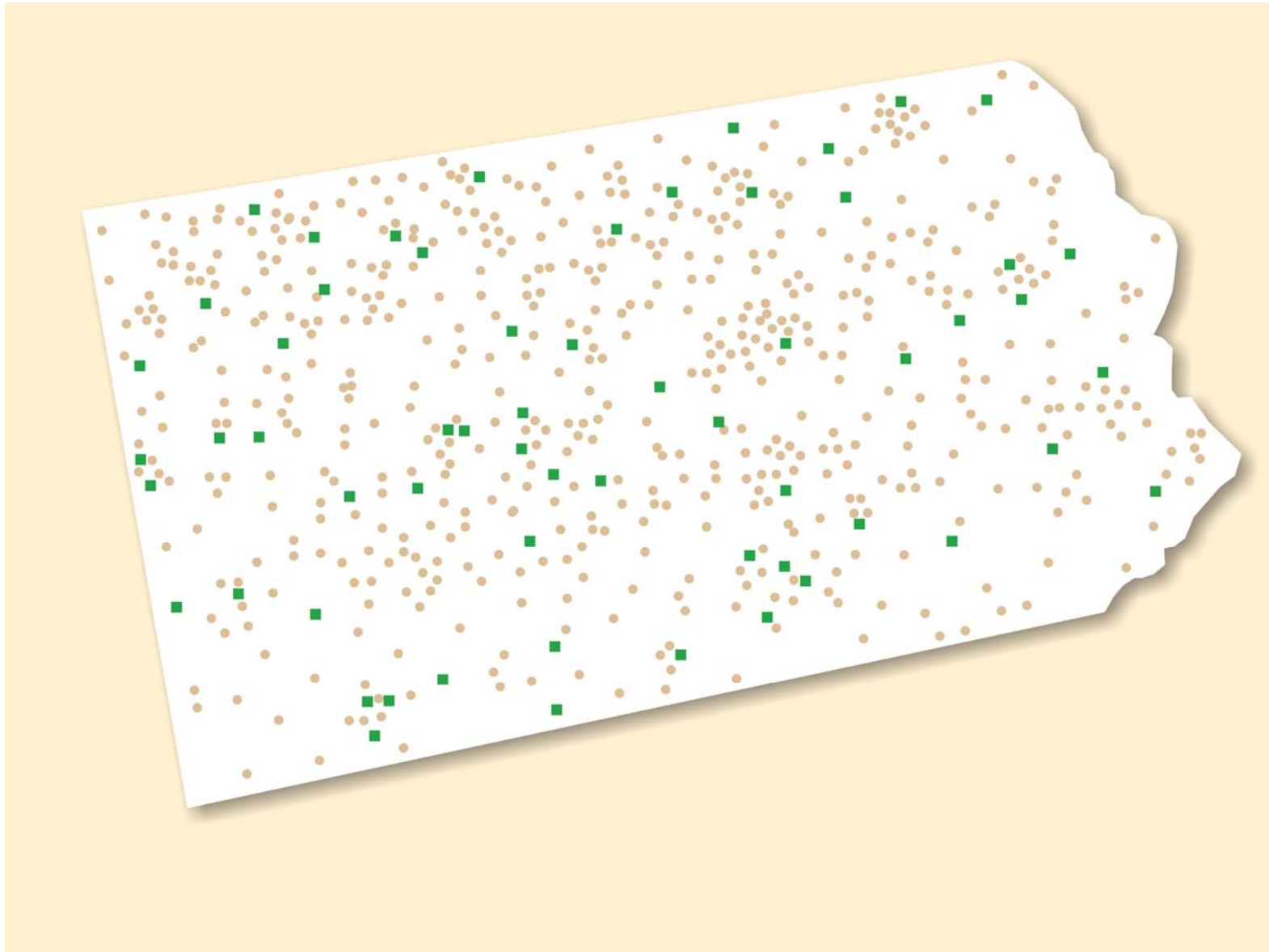
Facility Count Before ERP Inventory



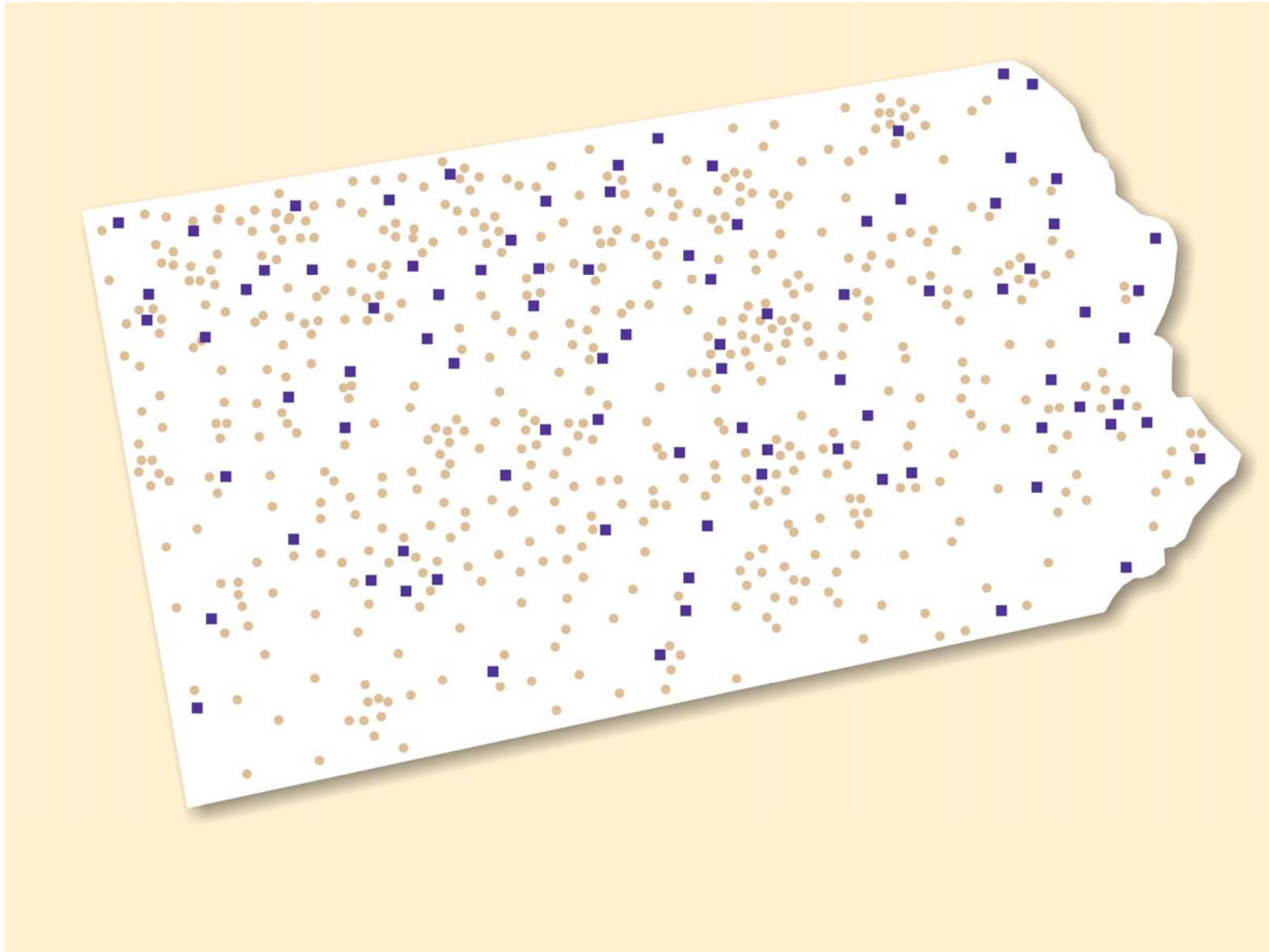
Facility Count After ERP Inventory



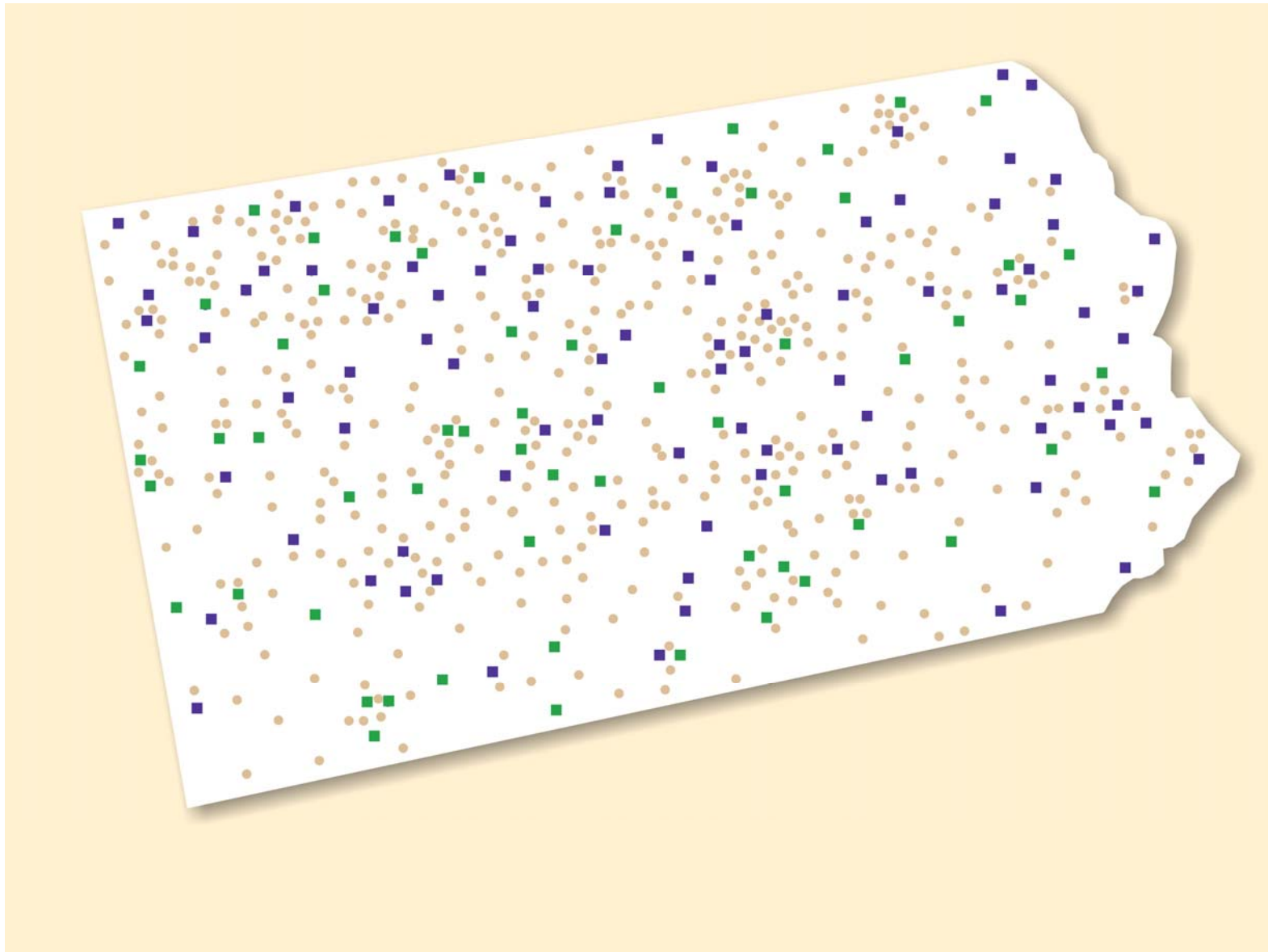
Return-to-Compliance (RTCs) Plans Submitted



Targeted Compliance and Enforcement Activity



RTC Plans and Targeted Compliance/Enforcement



Benefits of ERP

Regulators

- Increase effectiveness of compliance assistance and enforcement
- Enhance and measure environmental performance
- Target limited resources
- Address individual facility and cumulative impact of larger number of small sources
- Foster partnership among co-regulators and business
- Build and support a sustainable system of regulatory oversight

ERP Information

- U.S. EPA Website: epa.gov/permits
- MA DEP Website: mass.gov/dep/erp
- FL DEP Website:
[dep.st.fl.us/waste/categories/hazardous/
pages/autocert.htm](http://dep.st.fl.us/waste/categories/hazardous/pages/autocert.htm)
- RI DEM Website: state.ri.us/dem/programs

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