2006 Virginia Department of Environmental Quality
Report on Virginia Environmental Excellence Program Implementation
December 1, 2006

Executive Summary

The Virginia General Assembly adopted legislation in 2005 officially establishing the Virginia Environmental Excellence Program (VEEP). The program is intended to

> *recognize facilities and persons that have demonstrated a commitment to enhanced environmental performance and to encourage innovations in environmental protection.*

This report documents the program's current participation and environmental results and is submitted in accordance with § 10.1-1187.5 of the Code of Virginia. Facilities must apply to be part of the program and must demonstrate their commitment to environmental performance through the development of environmental management systems (EMS), implementation of pollution prevention programs and compliance with environmental regulations. There are three levels of participation (E2, E3 & E4); program requirements and potential incentives increase as facilities move from a lower to a higher level.

At the end of 2006, there were 345 facilities in the program. Two hundred fifty of the participating facilities were at the E2 level, seventy two were at the E3 level and sixteen were at the E4 level. In addition to these participants, there are an additional 30 facilities that have submitted applications to join the program.

Participating facilities achieved the following environmental results:

- $ 2.5 million in cost savings;
- 53,000 pounds hazardous materials use eliminated;
- 24,000 tons non-hazardous materials eliminated or recycled;
- 7,450 pounds hazardous waste eliminated or recycled;
- 1,205,296 kilowatt hours less purchased electricity;
- 55,980 square foot reduction in impervious surfaces;
- 38,300 mmBtu less fuel use for vehicles;
- 21.7 million gallons of water recycled;
- 46.3 million gallon reduction in water use;
- 64, 000 tons of waste material sold as a raw material; and,
- 23,000 pound equivalent elimination of an ozone-depleting substance.

Introduction

In 2005, the Virginia General Assembly adopted legislation officially establishing the Virginia Environmental Excellence Program (VEEP). The statute, which appears in Chapter 11.1 of Title 10.1, sections 10.1-1187.1 through 10.1-1187.7 of the Code of Virginia, is intended to

> *recognize facilities and persons that have demonstrated a commitment to enhanced environmental performance and to encourage innovations in environmental protection.*

Facilities must apply to be part of the program and must demonstrate their commitment to environmental performance through the development of environmental management systems (EMS), implementation of pollution prevention programs and compliance with environmental regulations. There are three levels of participation for interested facilities:

- E2 (Environmental Enterprise) for facilities that have made significant progress toward the development of an EMS, have made a commitment to pollution prevention and have a record of sustained compliance with environmental regulations.
- E3 (Exemplary Environmental Enterprise) for facilities that have exceeded the E2 requirements and have a fully-implemented EMS.
- E4 (Extraordinary Environmental Enterprise) for facilities that have exceeded the E3 requirements, have completed at least one full cycle of an EMS as verified by a third-party auditor and have demonstrated a commitment to continuous and sustainable environmental progress and community involvement. As outlined in the VEEP legislation, any facility that applies to and is accepted into the Environmental Protection Agency's Performance Track program is also considered to be an E4 facility.

Facilities are accepted for a three-year period and must renew their participation thereafter by submitting a renewal application. Participants are also required to submit a performance report each by April 1st for the previous calendar year.

VEEP participants receive two types of benefits from DEQ: positive publicity and regulatory flexibility. Regulatory flexibility can take the form of incentives applicable to all facilities of a certain type (i.e., E2, E3, E4) or innovations agreements specifically tailored for specific facilities called "alternate compliance requirements."

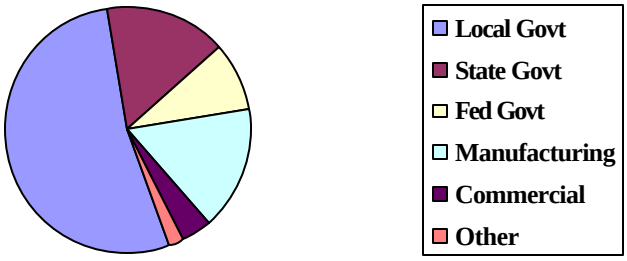
This report documents the program's current participation and environmental results from the annual reporting for calendar year 2005. In addition, the report details the incentives available under the program, including recognition ceremonies as well as regulatory incentives that have either been developed or are under development.

Status of Program Participation

At the end of 2006, there were 345 facilities in the program. Two hundred fifty of the participating facilities were at the E2 level, seventy two were at the E3 level and sixteen were at the E4 level. In addition to these participants, there are an additional 30 facilities

that have submitted applications to join the program. The chart below illustrates the breakdown of VEEP participation by economic sector.

VEEP Participation by Sector



VEEP Facility Networking

VEEP facilities in many areas of the Commonwealth have found that there are significant rewards from networking with their peers and focusing their EMSs on regional environmental priorities. DEQ strongly encourages these efforts because they may lead to facilities voluntarily committing to focus their EMS on regional issues such as air quality, Chesapeake Bay water quality and land conservation rather than strictly on facility operational priorities. This type of approach in Virginia has attracted national attention. Below are several examples.

Virginia Environmental Management System (EMS) Association

In 2006, representatives of several VEEP facilities formed the Virginia EMS Association, whose goal is to promote the implementation of EMSs to achieve environmental improvement and encourage new and continued participation in the program. Their first effort was the presentation of the "First Annual Virginia EMS Conference" in September, 2006, in Roanoke. DEQ, EPA and Virginia Tech were co-sponsors of the event, which drew over 140 people and included presentations on VEEP Basics, Advancing in VEEP, EMS 101, EMS Auditing and Sector Trends. Future plans include forming a support and education system to: promote and support EMS across the Commonwealth and across all sectors; provide a network of professionals to share information, ideas and strategies to help members advance or maintain their EMS programs; and provide a state-based liaison organization to communicate with DEQ and the EPA on EMS-based issues.

The **Virginia Regional Environmental Management System (VREMS)** is a partnership that includes over 40 federal, state, and local public and private organizations that collaborate to address community and environmental issues. VREMS was originally sponsored by the Department of Defense and the White House Council on Environmental Quality in 2003 as a pilot program to develop an EMS-based regional approach to environmental and community challenges. The VREMS partnership's success has led to continuing support by the Defense Supply Center Richmond (DSCR), a VEEP

E4/Performance Track facility. The DSCR finds value in VREMS because it enhances the facility's mission readiness, promotes sustainability and provides significant benefits to its local community. The partnership's mission is to: collaborate to address local and regional environmental priorities; improve communication and trust between partners and the community; leverage environmental experiences, best practices, lessons learned, and materials; and, help each partner cost-effectively manage their environmental impacts. Recent projects have focused on retrofitting diesel school buses in the Cities of Richmond and Hopewell to reduce air emissions, bringing fueling stations for the alternative fuel E-85 to eastern and northern Virginia, promoting energy efficiency at participants' locations and committing to reduce point and non-point sources of stormwater pollution.

The **Rivanna Environmental Management System Alliance** (REMSA) is a regional EMS partnership formed in the summer of 2005 in the Charlottesville-Albemarle County area by several VEEP facilities. REMSA partners include the City of Charlottesville, Albemarle County, University of Virginia, Rivanna Water and Sewer/Solid Waste Authority, and Albemarle County Public Schools. The original purpose was to network on issues related to EMS development and implementation; however, the group has evolved into a mutually beneficial partnership that works collaboratively to pursue environmental initiatives and realize environmental improvements on a regional level. REMSA partners have benefited from sharing information, ideas and best practices, pooling resources and experience and learning from each other's successes and mistakes. The environmental initiatives that REMSA has worked on in its first year include electronics recycling, school chemicals removal, B20 biodiesel use and hybrid-electric vehicles.

The **Chesapeake Bay-Focused EMS** initiative is a project of the regional Chesapeake Bay Program. The Bay Program has recently developed a document called "Introduction to a Chesapeake Bay-Focused Environmental Management System." The guide includes general information about EMS development as well as possible approaches to customize the elements of an EMS to focus on Chesapeake Bay restoration and sustainment goals.

Environmental Results Reported by Program Participants

To remain in good standing with the program, participating facilities must submit a report each year by April 1st for the previous calendar year. The report has three primary purposes: (1) it allows facilities to demonstrate their pollution prevention and environmental management progress; (2) it allows DEQ to confirm that the facility is maintaining its qualifications under the program; and (3) it informs DEQ and the public on the effectiveness of the VEEP program.

For calendar year 2005, to facilitate both reporting and data analysis, DEQ introduced an on-line reporting system. Facilities are required to provide general background information, quantified results from their beyond-compliance EMS and pollution prevention activities and updates on the development of their EMS as well as any environmental compliance issues that have arisen over the past year.

Environmental performance is reported using a comprehensive list of standard categories and indicators:

- Air emissions (greenhouse gases, nitrous oxide, particulate matter, sulfur dioxide, toxics, volatile organic compounds, other air emissions);
- Energy use (purchased electricity, on-site energy combustion, total energy use, other energy use);
- Water discharges (biological oxygen demand, chemical oxygen demand, nutrients, sediments, suspended solids, toxics, other water discharges);
- Water use (virgin water use, reclaimed/recycled water use, total water use, other water use);
- Waste (hazardous waste disposed, hazardous waste recycled, non-hazardous waste disposed, non-hazardous waste recycled, other waste);
- Materials use (hazardous materials use, non-hazardous use, recycled material use, recycled material use, other materials use);
- Land use (land preserved, land restored, other land use); and,
- Product performance (projected product lifetime energy/water use, projected end-of-life waste, packaging waste, other).

Facilities are also requested to report cost savings if available.

An analysis of the VEEP annual performance reports for calendar year 2005 shows the following reported environmental results:

- 53,000 pounds hazardous materials use eliminated;
- 24,000 tons non-hazardous materials eliminated or recycled;
- 7,450 pounds hazardous waste eliminated or recycled;
- 1,205,296 kilowatt hours less purchased electricity;
- 55,980 square foot reduction in impervious surfaces;
- 38,300 mmBtu less fuel use for vehicles;
- 21.7 million gallons of water recycled;
- 46.3 million gallon reduction in water use;
- 64, 000 tons of waste material sold as a raw material; and,
- 23,000 pound equivalent elimination of an ozone-depleting substance.

In addition, facilities reported more than $2.5 million in cost savings as a result of their voluntary environmental reductions. Success stories included by participants in their annual reports included the following information:

- Manufacturers:
  - Decreased hazardous solid waste production by 33% over 3 years

- Reduced:
  - Amount of solid waste entering landfills by 1,000 tons,
  - Virgin water use by 35.8 million gallons of water through recycling and conservation,
  - Annual energy use by 3%, and
  - Toxic air emissions by 3,400 pounds.
- Local Government Agencies:
  - Reduced use of solvents by 65% over 3 years,
  - Decreased hazardous waste generation by 100% (455 pounds) through produce substitution, and
  - Decreased use of virgin water at a golf course by 6.5 million gallons through use of conservation
- Furniture Manufacturer:
  - Reduced air emissions by 108 tons,
  - Reduced solid waste by 53 tons, and
  - Reduced hazardous waste by 8 tons.

VEEP Recognition Ceremonies

Upon acceptance into the program, facilities are given the option of having a recognition ceremony. If a ceremony is requested, DEQ will coordinate the event, which may involve representatives of DEQ's Central and Regional Offices as well as employees and local officials. In 2006, fourteen such events were held, including a large-scale ceremony for six Army installations, thirteen Army Reserve bases and sixty-seven National Guard facilities.

VEEP Regulatory Incentives

DEQ has found that regulatory and administrative flexibility are powerful incentives to drive improved environmental performance. With the EPA and other states, the Department is working to develop meaningful incentives tied to performance. At the same time, DEQ has taken independent steps on incentives that have put VEEP in the forefront of the national discourse. The categories of regulatory incentives identified as being of interest by participants include the following:

- Single agency point-of-contact;
- Reduced frequency of inspections;
- Permit duration increased;
- Expedited permit reviews and modifications;
- Reduced reporting and monitoring;
- Fee reductions; and,
- Customized variances.

There are several mechanisms used to develop and implement regulatory incentives that affect VEEP facilities located in Virginia: (1) revision of existing policies, procedures

and/or grant workplans; (2) modification of regulations; and, legislation adopted by the General Assembly that creates incentives for specific regulatory functions or requirements (including the customized variance provision included in the 2005 VEEP legislation). A status report on each of these mechanisms is included as Appendix A.

The 2005 VEEP statute authorized DEQ's three regulatory boards to grant innovative "alternate compliance methods" for facilities at the E3 and E4 levels. Examples of the types of requests anticipated under the provision include reduced monitoring and reporting frequency, streamlined permit application and renewal processes and the ability for a facility to make operational changes without prior approval from the Department. As outlined in the law, only alternate compliance methods (ACMs) that meet the purpose of the applicable regulatory standard, achieve the purpose through increased reliability, efficiency or cost effectiveness and provide equal or greater environmental protection will be approved. Proposals that alter existing standards, increase pollutants released to the environment, increase impacts to Virginia's waters or result in a loss of wetland acreage can not be approved. Depending on the method requested, the changes may require a permit amendment. A status report on the ACM requests that have been received by DEQ is included as Appendix B.

For Additional Information:

VEEP Website: www.deq.virginia.gov/veep

VEEP On-Line Reporting System: www.veeponline.org

Appendix A: Regulatory Incentives Adopted or Under Development

Incentive	Code, Regulation or Grant Agreement Citation	Effective Date	VEEP/ Performance Track Categories Affected	Explanation	Affected Facilities	Results
Annual Permit Fee Discount – Water	Water fee regulation (9 VAC 25-20-145)	9/8/2004; first discounts offered in 2005 for calendar year 2004	E2, E3 & E4/PT	In 2004, DEQ was directed by the General Assembly to revise its water permit fee structures to fund the agency's permitting activities. The new permit fee regulation includes discounts for facilities participating in VEEP covered by the water permitting programs: E2 – up to 2%; E3/E4 – up to 5%; total not to exceed $64,000 annually.	2005: 23 2006: 36	2005: $9,054 2006: $15,682
Annual Permit Fee Discount – Hazardous Waste	Hazardous waste fee regulation (9 VAC 20-60-1286)	9/8/2004; first discounts offered in 2005 for calendar year 2004	E2, E3 & E4/PT	In 2004, DEQ was directed by the General Assembly to revise its waste permit fee structures to fund the agency's permitting activities. The new permit fee regulation includes discounts for facilities participating in VEEP covered by the hazardous waste program: E2 – up to 5%; E3/E4 – up to 10%; total not to exceed $26,000 annually.	2005: 17 2006: 21	2005: $4.060 2006: $3,840
Annual Permit Fee Discount – Solid Waste	Solid waste fee regulation (9 VAC 20-90-117)	9/8/2004; first discounts offered in 2005 for calendar year 2004	E2, E3 & E4/PT	In 2004, DEQ was directed by the General Assembly to revise its waste permit fee structures to fund the agency's permitting activities. The new permit fee regulation includes discounts for facilities participating in VEEP covered by the hazardous waste program: E2 – up to 10%; E3/E4 – up to 20%; total not to exceed $140,000 annually.	2005: 22 2006: 28	2005: $58,962 2006: $45,293
Alternate Compliance Method (ACM)	VEEP Statute (Section 10.1-1187.6, Code of Virginia)	7/1/2005	E3 & E4	The three boards "may grant alternative compliance methods to the regulations adopted pursuant to their authorities" for VEEP E3 & E4 facilities considered to be in good standing with the program. Potential ACMs include "changes to monitoring and reporting requirements and schedules, streamlined submission requirements for permit renewals, the ability to make certain	See Attachment B	See Attachment B

Incentive	Code, Regulation or Grant Agreement Citation	Effective Date	VEEP/ Performance Track Categories Affected	Explanation	Affected Facilities	Results
				operational changes without prior approval, and other changes that would not increase a facility's impact on the environment."		
Solid Waste Permit Review Preference	Waste Guidance Memo No. 4-2006: Hierarchy of Solid Waste Permitting Review Priorities	Draft	E3 & E4	In some cases, participation at the E3 or E4 levels of VEEP may afford a facility with a higher level of permitting priority than would otherwise be the case.	None to date.	N/A
WWTP Nutrient Limits Incentive	The regulation is currently in draft form.	The regulation is currently in draft form.	E3 & E4	The new nutrient technology regulation requires WWTP owners to install & operate nutrient control technologies by an established nutrient limit. Under the conventional approach, the permit limits would always be in effect and violation of the limits could result in significant penalties. With the incentive, the plant owner has the option of qualifying for E3 or E4 status, and include as part of his EMS a commitment to operate his nutrient removal facilities at the efficiencies they are designed to achieve. Once approved under this ACM, the permit limits for nutrients are suspended, & the owner is not liable for any penalties for failure to meet the intended nutrient removal efficiencies. Once in the program, the consequence of poor performance is the loss of the privilege of operating with suspended limits (w/o liability of enforcement penalties), but plants can "earn" their way back in to the program.	N/A	N/A
Electronic Submission of Water Discharge Monitoring Reports (eDMRs)	N/A	Not in effect yet for all VEEP/Performance Track facilities.	E3 & E4	The due date for Discharge Monitoring Reports can be moved to the 24th of the month if the facility is also participating in the eDMR program.	One facility has been granted this waiver. Without additional programming, e-DMR cannot accommodate a	N/A

Incentive	Code, Regulation or Grant Agreement Citation	Effective Date	VEEP/ Performance Track Categories Affected	Explanation	Affected Facilities	Results
					date change from the 10th to the 24th of the month. International Paper (see Attachment B) was granted the waiver.	
Reduced Frequency of Air Maximum Available Control Technology (MACT) Reporting	4/22/04 EPA Regulation (69 FR 21737); adopted by Virginia 9 VAC 5-60-100, Subpart A	1/12/2005	Performance Track (most of these facilities are also E4)	This incentive reduces the frequency of reports required under the MACT provisions of the Clean Air Act such that semi-annual reports may be submitted annually, and in certain cases members may submit an annual certification for these requirements in lieu of an annual report.	None to date.	N/A
Low Priority for Routine Inspections – Waste Programs	10/29/03 EPA Office of Enforcement & Compliance Assurance Assistant Administrator Memorandum; a specific list of Virginia facilities entitled to the benefit is included in the DEQ/EPA Performance Partnership Grant each federal fiscal year for waste.	9/30/2005	Performance Track (most of these facilities are also E4)	EPA Performance Track facilities located in Virginia are considered a low priority for routine inspections by DEQ. Routine inspections comprise the majority of inspections and generally occur when there is no specific reason to believe that a violation exists at a specific facility. Inspections of PT facilities will be conducted if EPA or DEQ has information based on a citizen complaint, other DEQ or EPA program referral or observation, or other information that non-compliance issues may exist, including criminal activity, non-compliance in a priority area of concern to EPA or DEQ, or endangerment to human health and the environment. Otherwise, inspections will be conducted at less-than category specific intervals (i.e., semi-annually rather than annually, etc.) unless such action conflicts with the federally mandated requirements.	The policy affects the facilities considered to be in "good standing" with Performance Track as of September 30 for the following fiscal year's activities. As of September 30, 2006, there are ten PT facilities in Virginia.	N/A
Low Priority	10/29/03 EPA Office	10/1/2006	Performance	Inspection Schedule: The water division has	The policy affects	N/A

Incentive	Code, Regulation or Grant Agreement Citation	Effective Date	VEEP/ Performance Track Categories Affected	Explanation	Affected Facilities	Results
for Routine Inspections – Water Programs	of Enforcement & Compliance Assurance Assistant Administrator Memorandum; the DEQ/EPA Performance Partnership Grant each federal fiscal year for water is in the process of being revised.		Track (most of these facilities are also E4)	negotiated a move to a risk-based inspection strategy with EPA Region III beginning in federal fiscal year 2007 (October 1), beginning with E4 facilities.	the facilities considered to be in "good standing" with Performance Track as of September 30 for the following fiscal year's activities. As of September 30, 2006, there are ten PT facilities in Virginia.	
Low Priority for Routine Inspections – Air Programs	10/29/03 EPA Office of Enforcement & Compliance Assurance Assistant Administrator Memorandum; the DEQ/EPA Performance Partnership Grant each federal fiscal year for water is in the process of being revised.	N/A	Performance Track (most of these facilities are also E4)	Inspection Schedule: The incentive has not yet been incorporated into its annual inspection strategy negotiated with EPA Region III.	The policy affects the facilities considered to be in "good standing" with Performance Track as of September 30 for the following fiscal year's activities. As of September 30, 2006, there are ten PT facilities in Virginia.	N/A
RCRA Extended Hazardous Waste Storage Time	EPA Regulation 4/22/04 (69 FR 21737); adopted by Virginia HQ IFR2004	9/8/2004	Performance Track (most of these facilities are also E4)	Extends on-site storage times for accumulated hazardous waste for large quantity generators to 180 days (270 days if the waste is transported more than 200 miles) without a RCRA permit or interim status	Qimonda (Sandston)	Disposal cost savings of approximately $2,500. Labor cost savings of approximately $1,850 for Technician and Coordinator's administrative time.

Appendix B: VEEP Alternate Compliance Methods (ACM) and Agreements

Name of Facility	Innovation Request	Affected Regulatory Requirement or Administrative Process	ACM Status	Benefits
International Paper (Franklin)	Air: Lime kiln scrubber refresh flow rate not be considered part of the Continuous Parameter Monitoring System with MACT II recordkeeping and reporting requirements	Permit: Recordkeeping and reporting requirements modified	Request will be granted by changing permit language to reflect that the refresh flow rate continue to be monitored, but not as part of the CPMS under MACT II. This will occur when the facility's FESOP (federally enforceable state operating permit) and Title V permit are reopened.	The CPMS recordkeeping and reporting requirements under the MACT are more burdensome than those already in effect at the facility. The facility will reduce staff costs by 16 hours/year. No environmental benefit will be gained from the extra requirement.
International Paper (Franklin)	Air: Waiver to opacity limits for one of the facility's boilers	Permit: Condition modified so that the visible emissions from the #4 Recovery Boiler will be consistent with only the MACT (opacity limits imposed by the minor New Source Review permit to be waived)	Request will be granted when the facility's FESOP (federally enforceable state operating permit) and Title V permit are reopened.	No additional environmental benefit will be gained by requiring two sets of opacity limits, since the Boiler is routinely in compliance with opacity limits. The facility will reduce staff costs by 120 hours/year.
International Paper (Franklin)	Air: Change in the frequency of the Cylinder Gas Audits and Relative Accuracy Test Audits on the Lime Kiln TRS Continuous Emissions Monitoring System	Permit: Reduction in frequency of audits and test audits	Request will be granted. Quarterly CGA thresholds will be established to trigger resumption of original RATA frequency to ensure adequate data accuracy. This will occur when the facility's FESOP (federally enforceable state operating permit) and Title V permit are reopened.	The facility will reduce their QA/QC costs by $13,000/year (40 hours). There will be no accompanying loss in data accuracy.
International Paper (Franklin)	Air: Change in notification requirements for scheduled G-Set Steam Stripper or RTO Outage	Permit: Permit modified (dependent on EPA concurrence) to waive this requirement for these two pieces of equipment because this reporting requirement is redundant with excess emissions reporting that the facility must do under 9 VAC 5-20-180 C and/or under	In order to grant relief from this requirement, the State Air Pollution Control Board will need to grant a variance in the form of a regulation.	More efficient use of staff resources for both the facility and DEQ. The facility will reduce staff costs by 25 hours/year.

Name of Facility	Innovation Request	Affected Regulatory Requirement or Administrative Process	ACM Status	Benefits
		the MACT.	The variance will also need approval by EPA. The EPA regional staff has been consulted as to the appropriateness of granting the variance; it has yet to respond.	
International Paper (Franklin)	Air: Change in reporting requirements for excess emissions that require the facility to report within four business hours for any permit deviations or control equipment failure/malfunction that may cause excess emissions for >1 hour.	Permit: Permit condition will change to allow the facility to report routine calls for excess emissions within 24 hours, instead of 4 hours as is currently required. The facility has stated that if the excess emission event has the potential to cause an immediate impact on the surrounding community or release of a hazardous material, reports will be submitted with the 4 business hour period.	In order to grant relief from this requirement, the State Air Pollution Control Board will need to grant a variance in the form of a regulation. The variance will also need approval by EPA. The EPA regional staff has been consulted as to the appropriateness of granting the variance; it has yet to respond.	The facility will no longer have to make several calls/day for different excess emissions events throughout the plant that have no adverse environmental impact and for which no DEQ response is needed, reducing staff costs by 100 hours/year. Instead, the facility can make one phone call each day listing all the events for the previous day. This will lead to a more efficient use of staff resources at the facility and DEQ.
International Paper (Franklin)	Air: Reduction in air compliance inspection frequency	DEQ Inspection Schedule (detailed in annual federal grant workplan negotiated with EPA): EPA Compliance Monitoring Strategy (CMS) is implemented through DEQ's grant and does not allow any reduction in inspection. EPA approval will be required.	Site specific Compliance Monitoring Strategy will be developed. DEQ will need EPA approval to allow for a different inspection frequency for VEEP sources.	This request will benefit both DEQ and the facility by reducing the time staff needs to dedicate to inspections of VEEP facilities. All reports will continue to be submitted and be reviewed by DEQ. The facility will reduce staff costs by 50 hours/year.
International Paper (Franklin)	Water: Change in submittal date for water Discharge Monitoring Report	Permit Waiver to Reporting Requirement: If IP participates in the eDMR program (see Appendix A), then the report due date can be moved from the 10th to the 24th of the month.	Request resolved	This will allow the facility to only have to submit one set of data each month instead of two or more. It will reduce the DEQ staff time needed to input updated

Name of Facility	Innovation Request	Affected Regulatory Requirement or Administrative Process	ACM Status	Benefits
				information. The facility will reduce staff costs by 50 hours/year.
International Paper (Franklin)	Water: Virginia Pollution Discharge Elimination System (VPDES) permit length	Permit: The length of water discharge permits is established by the federal Clean Water Act; DEQ, as an agency delegated by EPA to carry out the requirements of the Clean Water Act, is subject to its requirements, which establish the permit length at five years.	DEQ's permit efficiency study will address the issue of altering the requirements for the reapplication process that may afford VEEP/Performance Track facilities a reduced processing time.	Reduction in staff time required for permit preparation and actual costs associated with sampling and application fees (~$35,000 every 5 years).
International Paper (Franklin)	Water: Reduction in inspection frequency for Effluent Treatment System/Laboratory	DEQ Inspection Schedule (detailed in annual federal grant workplan negotiated with EPA): The water division has negotiated a move to a risk-based inspection strategy with EPA Region III beginning in federal fiscal year 2007 (October 1). E4/Performance Track facilities such as IP are the priorities for this strategy.	Request pending.	Reduction in both facility and DEQ staff resources dedicated to the inspection. The facility will reduce staff costs by 40 hours/year.
International Paper (Franklin)	Waste: Changing inspection frequency for hazardous waste compliance from every 2 years to every 5 years.	DEQ Inspection Schedule (detailed in annual federal grant workplan negotiated with EPA): DEQ has adopted EPA's policy for low priority for routine inspections of E4/Performance Track facilities in the hazardous waste program.	Request denied due to federal statutory inspection frequency requirements. In the fall of 2006, DEQ was informed by EPA Region III that neither EPA nor Virginia can violate federal statutes regarding inspections at permitted TSD facilities, even when those facilities are in programs such as VEEP or Performance Track. Federal law establishes the requirements for annual inspections of federal, state or local government treatment, storage or disposal (TSDs) facilities. (40 U.S.C. § 6927 (c)-(d)). Privately owned TSDs must be	Reduction in both facility and DEQ staff resources dedicated to the inspection. The facility will reduce staff costs by 40 hours/year.

Name of Facility	Innovation Request	Affected Regulatory Requirement or Administrative Process	ACM Status	Benefits
			inspected every other year. (40 U.S.C. § 6927 (e) (1)). Therefore, IP will be inspected as scheduled every two years.	
International Paper (Franklin)	Waste: Changing inspection frequency for solid waste compliance from quarterly to semi-annually	Inspection Schedule: DEQ is developing risk-based inspection procedures. This request is in-line with its general concepts.	Request resolved. IP is now scheduled to be visited once every six months for routine inspections.	Reduction in both facility and DEQ staff resources dedicated to the inspection. The facility will reduce staff costs by 10 hours/year.
International Paper (Franklin)	Waste: Remove Annual Appendix IX monitoring due to the high cost associated with it	Permit: Reduction in the number of parameters in the facility's RCRA Corrective Action monitoring	Request withdrawn until EPA authorizes DEQ's regulatory changes that will allow DEQ to change the permit.	The facility will save $10,000/year in costs associated with monitoring compounds not in the corrective action program.
International Paper (Franklin)	Waste: Waiver from the requirement that an on-site certified solid waste management facility operator be available at all times due to the fact that the facility is only used part of the day and is otherwise secured.	DEQ Policy	Request resolved. DEQ will allow the operator to be nearby at the main facility.	The facility will save $180,000 per year.
DuPont Spruance (Richmond)	Multimedia: DEQ single point-of-contact for facility to be used by the facility as needed	Agency Communications with Facility	Request resolved. DEQ's Piedmont Regional Director will serve as the facility's single point-of-contact This is relevant only when the facility is initiating the communication (e.g., all DEQ programs are not required to communicate to the facility via the POC).	The facility estimates that it will save $5,000 per year (8 person days per year). The single point-of-contact is of particular importance to the facility when dealing with large multimedia issues.
DuPont Spruance (Richmond)	Multimedia Enforcement Assistance	Agency Communications with Facility	Request resolved. DEQ will contact the facility via the telephone prior to issuing a warning letter or Notice of Violation in cases where a document/report submission	The facility estimates that it will save $1,500 per year (3 person days/year) at a minimum, but could double or triple those savings depending on the nature of

Name of Facility	Innovation Request	Affected Regulatory Requirement or Administrative Process	ACM Status	Benefits
			appears to be late or missing.	the issue.
Hopewell Regional Wastewater Treatment Facility	Water: Reduce water discharge sampling frequency from 7 days/week to 5 days/week for Biological Oxygen Demand, fecal coliform, E. coli and chorine residual.	Water Discharge Permit	Request pending	The plant would be able to reduce lab staff necessary for weekend analyses.