



# **Finding Better Ways to Provide Environmental Compliance Assistance in Indiana**

**March 25, 2010**

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Compliance & Technical Assistance**

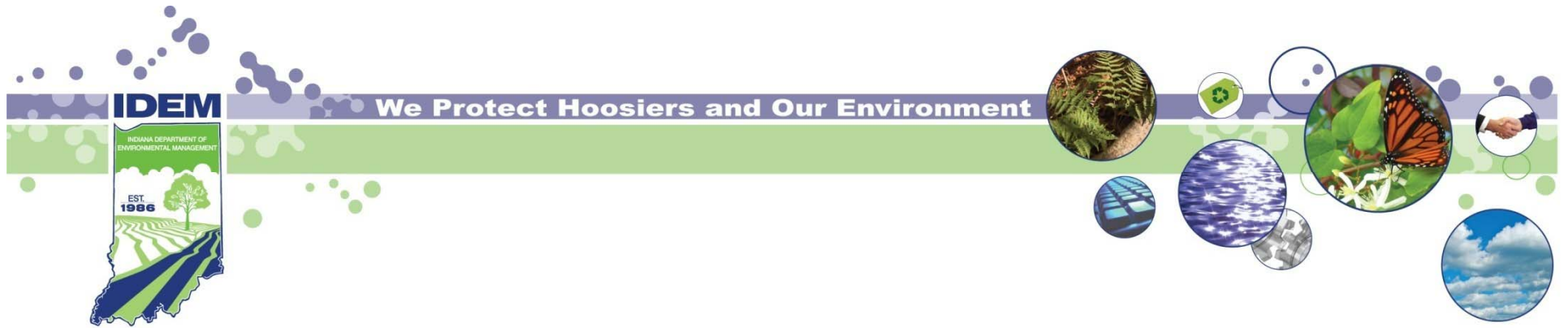
**IDEM**





## How does IDEM protect Hoosiers and our environment?

- Implement Federal and State regulations that restrict chemical discharges to the environment
- Monitor affected facilities to ensure compliance with regulations and permits
- Take appropriate action when non-compliance is found
- *Assist and encourage others to help protect Hoosiers and our Environment*



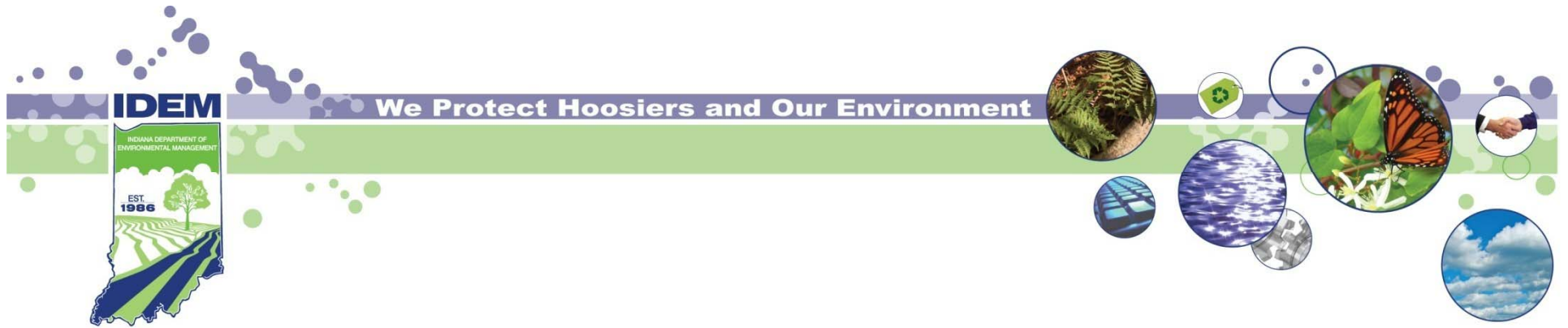
# Our Focus:

*Find better ways* to assist  
and encourage others to  
protect Hoosiers and our  
environment



# Our Goal:

Every regulated entity understands and complies with their environmental responsibilities, and to encourage and recognize those who choose to go above and beyond compliance.



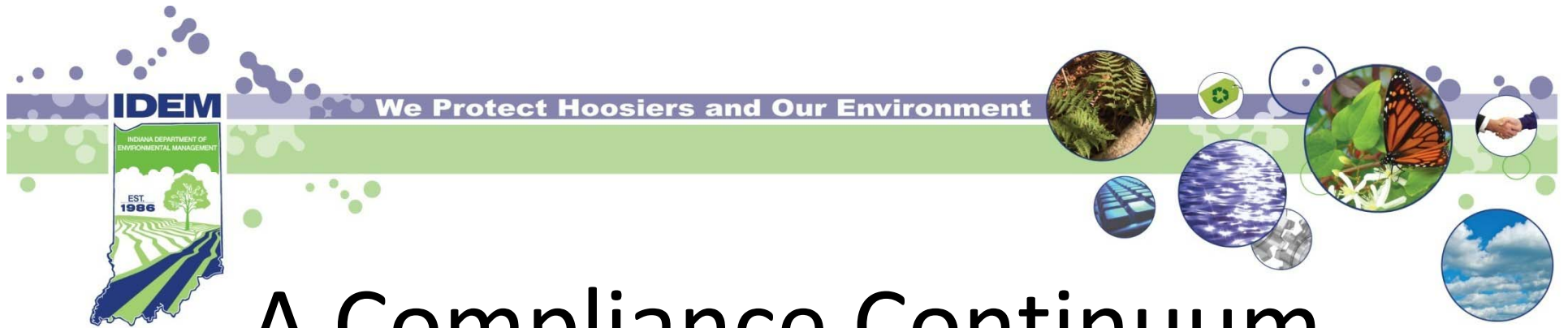
# Our Strategy:

# Assistance first!

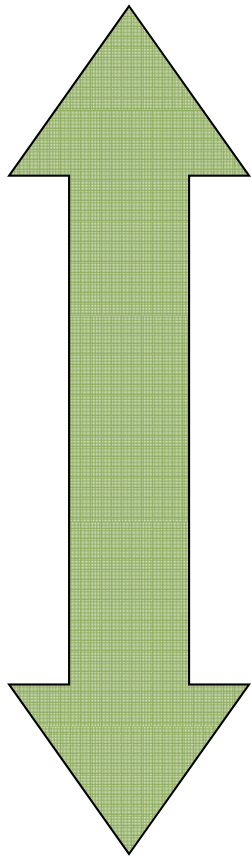


# Why?

The fundamental reason we promote voluntary compliance and beyond is that it frees resources to move the agency forward, helps our environment, and allows us to focus on entities that may not take steps toward compliance.



# A Compliance Continuum

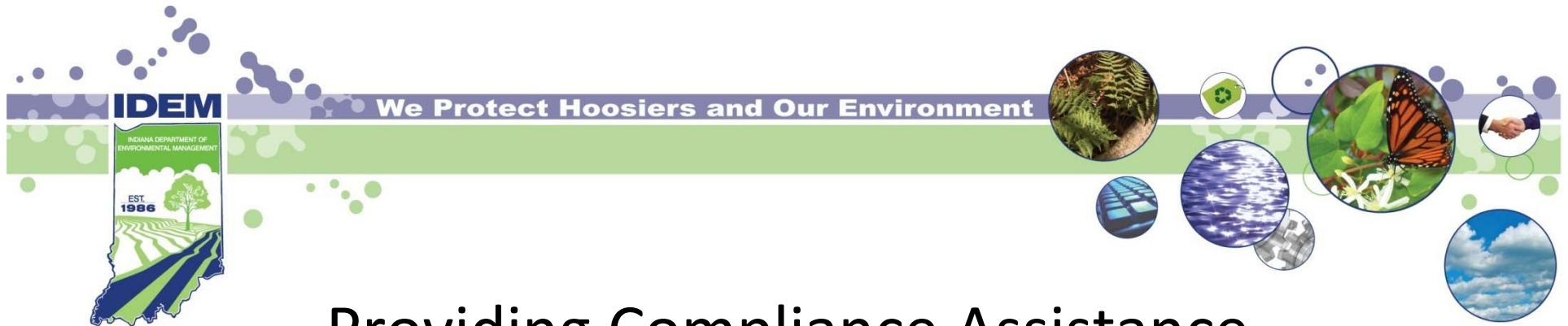


- Sustainability
- Stewardship
- Systems approach
- Beyond compliance
- Compliance
- Pre-compliance



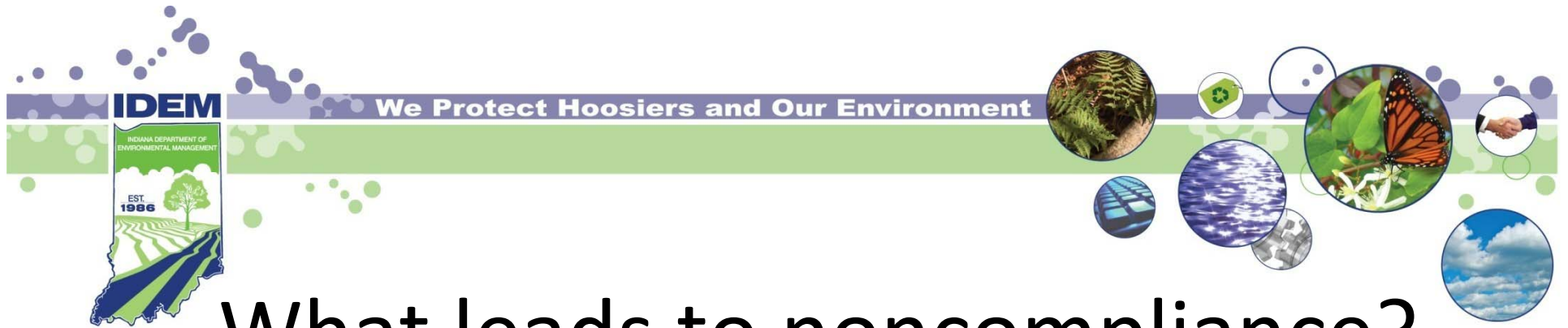
## The Key:

Matching the tools to the right application of where organizations fall on the continuum of compliance



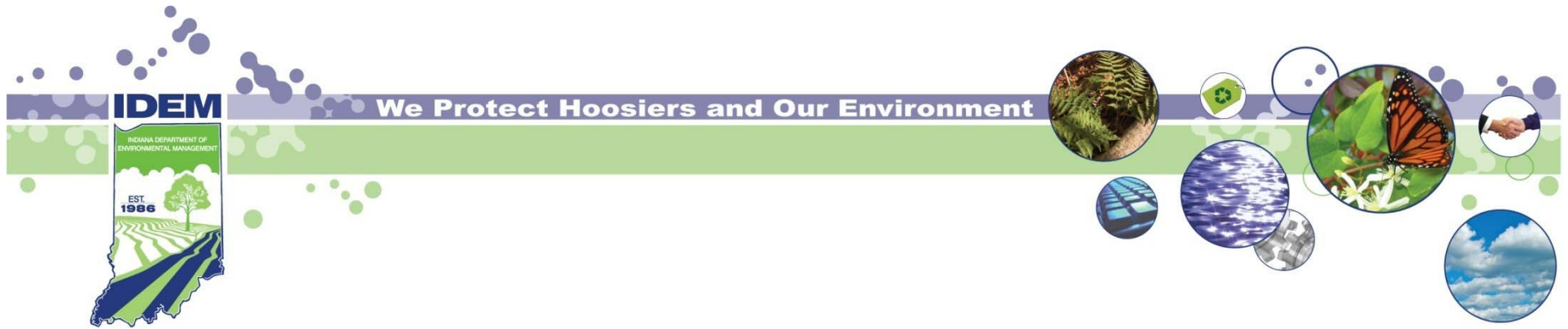
## Providing Compliance Assistance

- Compliance and Technical Assistance Program
- OWQ Wastewater Compliance Branch
- OAQ Compliance and Enforcement Branch
- OLQ Compliance and Response Branch



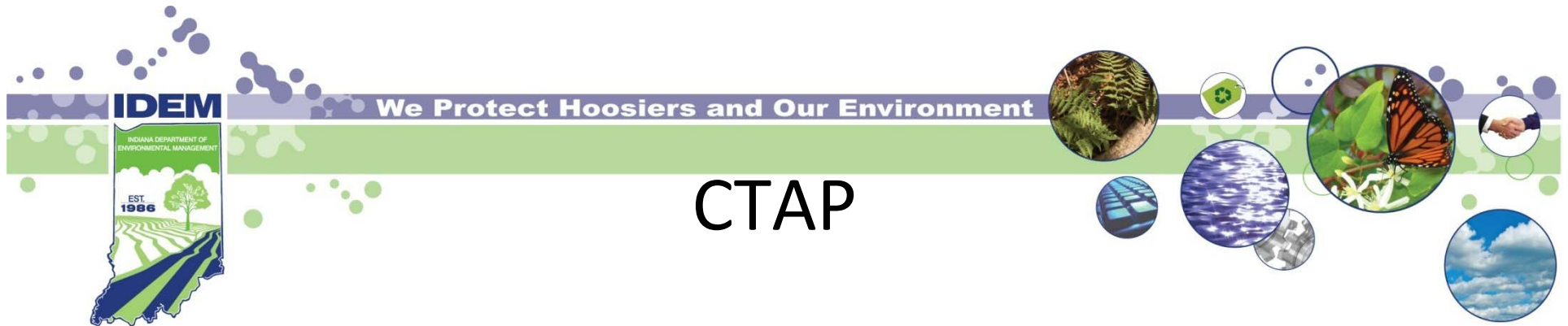
# What leads to noncompliance?

- Does a regulated entity know they have requirements?
- Does the regulated entity understand the requirements?
- Do they have financial means to comply with the requirements?
- Do they have the motivation to comply with the requirements?



## **Compliance and Technical Assistance Program (CTAP)**

- **Assist Hoosier businesses in understanding and achieving environmental compliance.**
- **All CTAP services are:**
  - **Free**
  - **Voluntary**
  - **Confidential**



## CTAP

### **During 2009, CTAP:**

- **Conducted 3572 assistance efforts.**
- **Performed 327 on-site compliance assistance visits.**
- **Presented information to 1790 workshop/conference attendees.**
- **Partnered with OAQ on the Surface Coating and Article 2 Initiatives; and assisted with outreach for Start-up/Shutdown/Malfunction and Secondary Aluminum NESHAP.**
- **Assisted OWQ with e-DMR outreach and Marina Stormwater Rule 6 Guidance.**
- **Partnered with OLQ on the County Highway Garage Initiative, Auto Salvage workshops and the Clean Yard program.**

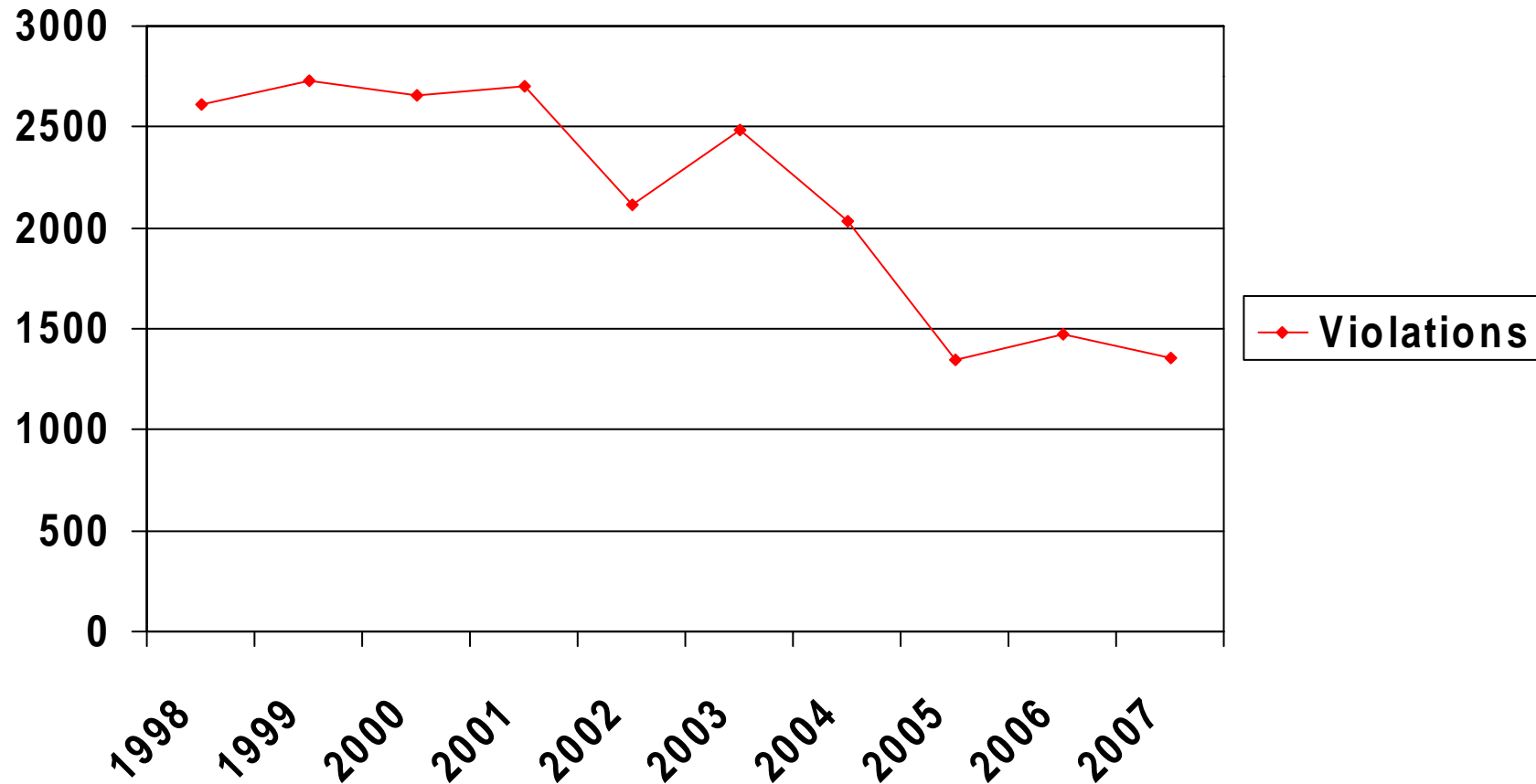


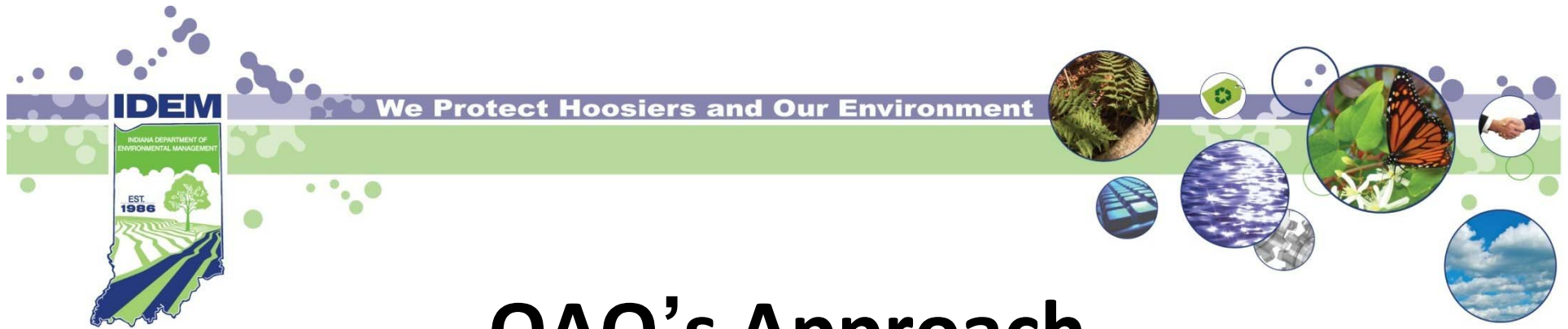
## OWQ/Drinking Water Approach

- Sampling assistance
- Phone call and letter reminders for each event
- Training – manuals, fact sheets, etc.
- Assistance visits
- Check Up Program for Small Systems - determines “root” cause(s) of noncompliance



# Drinking Water Compliance Individual Monitoring & Reporting Violations





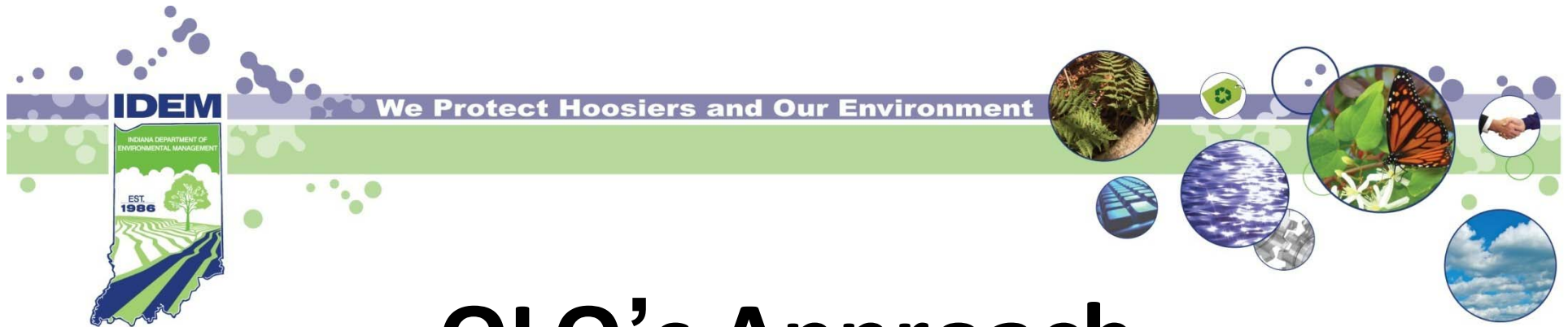
## OAQ's Approach

- Improve compliance at permitted sources by providing technical assistance immediately after permits are issued and prior to inspections and enforcement.
- Do sources have a sufficient understanding of the permit requirements?
- Assist air-permitted facilities in navigating through their Title V, FESOP, or MSOP initial permit, renewed permit, or Significant Source Modification after issuance and prior to an inspection.
- Focus on significant non compliance at permitted sources.



## OAQ Results

- 495 Offers made to companies/letters sent (9/2008 – 1/2010)
- 95 Requests for assistance made by permitted sources
- 95 Visits made by IDEM/OAQ Compliance and Enforcement Managers/Inspectors
  
- No significant noncompliance has been identified at sources taking advantage of compliance assistance visits.
  
- Seven (7) of the sources still had minor type of violations such as a few missing records, late submittals, or missing a compliance monitoring requirement after assistance was provided.
  
- Challenge is to get sources with significant noncompliance or repeated noncompliance to take advantage of assistance and improve compliance.



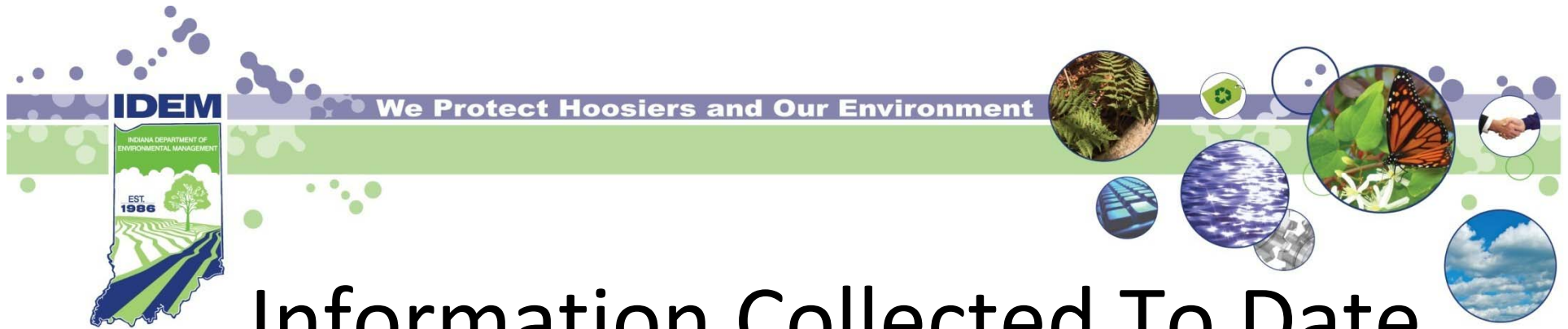
# OLQ's Approach

- **W.A.R.N. Assistance Initiative**

Worker Adjustment and Retraining Act – Dept of Labor 29 CFR Part 639 **Provide compliance assistance to companies experiencing plant closing or mass layoff of employees.**

- Increase compliance
- Improve awareness
- Reduce mismanaged or abandoned waste





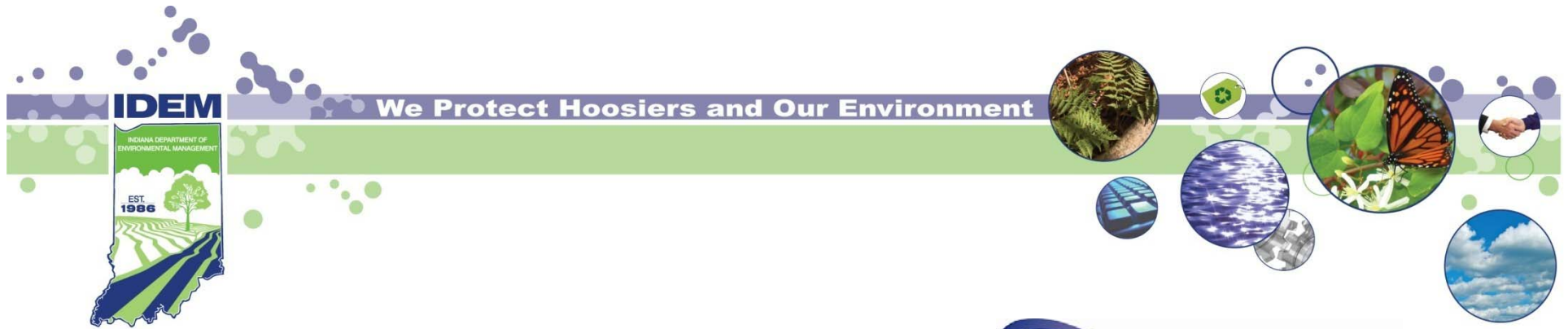
# Information Collected To Date

- Company considered visit beneficial:  
74% Yes 4% No 22% Neutral
- Compliance issues were identified at approximately 28% of the inspected facilities
- Approximately **100 tons** of waste were identified as waste generated due to closing activities



## Encouraging and Recognizing Businesses that go Above and Beyond

- Partners for Pollution Prevention
- Environmental Stewardship Program



## Partners for Pollution Prevention



- Indiana industries and businesses that are interested in pollution prevention as well as the financial and environmental benefits P2 projects can bring.
- The Partners provide a forum where Indiana businesses can network and exchange ideas about P2 experiences and discuss how P2 fits into current and future IDEM programs.
- There are currently 60 members of the Partners for Pollution Prevention

**IDEM**

**We Protect Hoosiers and Our Environment**



# Environmental Stewardship Program (ESP)



**Indiana  
Environmental  
Stewardship  
Program**

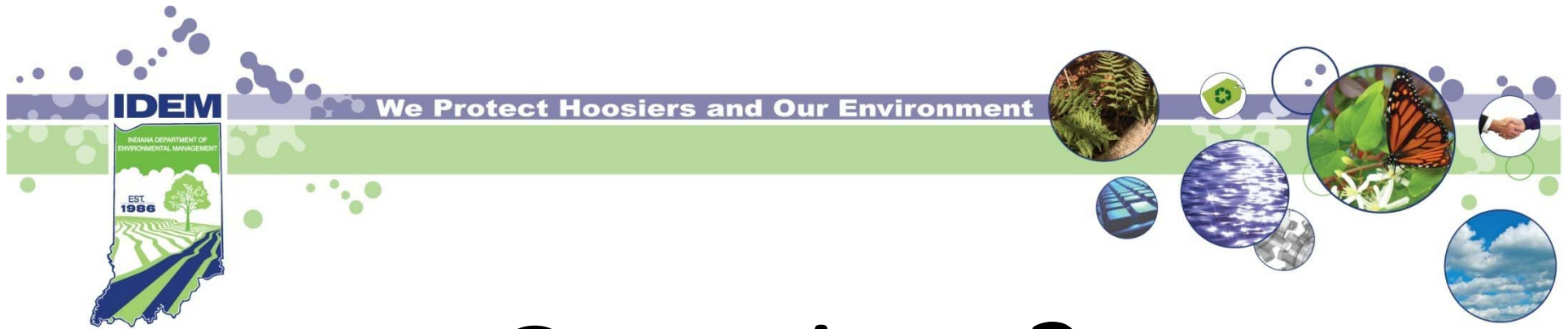
*Better Environment, Better Business*

Indiana Department of Environmental Management



## ESP

- Promote Environmental Management Systems and continuous environmental improvement
- Provide regulatory flexibility incentives for members
- Focus resources on priority facilities
- There are currently 46 ESP members.



# Questions?

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