

COMMONWEALTH OF VIRGINIA

Department of Environmental Quality

Subject: Virginia Environmental Excellence Program Operations Manual
Last Updated December 2019

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Date: December 4, 2019

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Summary:

The Virginia Environmental Excellence Program (VEEP) is a voluntary program that recognizes facilities that have demonstrated a commitment to enhance environmental performance. The program encourages innovations in environmental protection. VEEP consists of two separate tracks: A Sustainability Partners Track and a multi-level Environmental Management System (EMS) Track. This manual contains implementation guidance for both tracks. Procedures for the submission, review and approval or rejection of all applications are outlined in the manual. The manual includes guidelines for environmental reporting on environmental programs by members. Procedures for program support, maintenance and required documentation are also outlined in the manual.

Electronic Copy:

An electronic copy of this guidance is available on:

The Virginia Regulatory Town Hall under the Department of Environmental Quality

<http://townhall.virginia.gov/L/ViewGDoc.cfm?gdid=6378>

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Certification:

As required by Subsection B of [§ 2.2-4002.1](#) of the APA, the agency certifies that this guidance document conforms to the definition of a guidance document in [§ 2.2-4101](#) of the Code of Virginia.

Disclaimer:

This document is provided as guidance and, as such, sets forth standard operating procedures for the agency. However, it does not mandate or prohibit any particular action not otherwise required or prohibited by law or regulation. If alternative proposals are made, such proposals will be reviewed and accepted or denied based on their technical adequacy and compliance with appropriate laws and regulations.



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Table of Contents

- 1.0 Introduction to the Operations Manual 3**
- 2.0 Overview of VEEP..... 4**
 - 2.1 Program Objectives 4
 - 2.2 Program Structure 5
 - 2.3 VEEP Staff 5
 - 2.4 Regional Coordination 5
 - 2.5 Integration with Media Programs and Enforcement Staff 6
- 3.0 VEEP EMS Track 7**
 - 3.1 Overview 7
 - 3.2 Recruiting 7
 - 3.3 Application Process 7
 - 3.3.1 Application Submission & Acceptance8
 - 3.3.2 Application Review Process8
 - 3.3.3 EMS Track Compliance Review9
 - 3.3.4 Site Visits12
 - 3.3.5 CEDS12
- 4.0 VEEP Sustainability Partners Track14**
 - 4.1 Application Review Process14
 - 4.2 Compliance Review Process15
- 5.0 Member Services16**
 - 5.1 Member Communications16
 - 5.2 Recognition Ceremony Requests E2, E3, E416
 - 5.3 Recognition Letter Requests17
 - 5.4 Information Requests17
 - 5.5 Member Events17
- 6.0 Incentives for Member Facilities18**
 - 6.1 Permit Fee Discounts for Water and Waste Permittees18
 - 6.2 Alternative Compliance Methods19
 - 6.3 Single Point of Contact20
- 7.0 Annual Performance Reporting21**
 - 7.1 Annual Report Overview21
 - 7.2 Annual Performance Reporting Review Process21
 - 7.2.1 Reporting Website Preparation21
 - 7.2.2 Report Submission21
 - 7.2.3 Report Review22
 - 7.2.4 Report Acceptance Procedures22
 - 7.2.5 Facilities that Fail to Submit an Annual Report22
 - 7.2.6 Aggregate Report22

8.0	Membership Status	23
8.1	Membership Renewal.....	23
8.2	Membership Withdrawal.....	23
8.3	Membership Termination.....	23
8.4	Membership Suspension.....	24
9.0	Information/Data Management	25
9.1	Overview	25
9.2	Website	25
9.3	Database.....	25
9.4	Archives	25
9.5	ECM QA/QC Process & Tracking	26
Appendix A: Links to VEEP Documents & Templates.....		28

1.0 Introduction to the Operations Manual

This manual is designed to act as a reference for DEQ employees involved in the implementation of the Virginia Environmental Excellence Program (VEEP). It summarizes information on all current aspects of VEEP implementation, and includes references to detailed program materials. The manual is a “working document”; it will be maintained in electronic form so that it can be updated as necessary.

2.0 Overview of VEEP

The DEQ launched VEEP (E2 & E3) in 2000 as a voluntary recognition and incentive program for facilities of all types. In 2005 the E4 level was added when the Virginia General Assembly adopted legislation that provides the legal basis for VEEP. Program requirements for VEEP are outlined in Section §10.1-1187.3 of the Code of Virginia, including the 3-tiered design of the program, the requirements for participation, the annual reporting requirements and potential incentives. In 2012 VEEP was expanded and the Sustainability Partners (SP) track was added to the program. This portion of the program is not legislated. The most recent change to VEEP is the addition of projects being eligible for the VEEP Environmental Management System (EMS) Track (E2, E3 & E4). Because of VEEP, Virginia has come to be regarded as a leader on issues related to performance-based programs, particularly those related to the implementation of non-regulatory approaches that provide increased operational flexibility for the facility and better results for the environment.

The philosophy underlying VEEP is that economic and environmental performance are complementary. A cooperative approach to environmental performance from both the regulated community and the regulatory agency can augment the traditional command-and-control regulations. VEEP is designed to act as the platform for promoting environmental innovation and a unique collaborative relationship aimed at maximizing the potential for superior environmental performance. It is not meant to replace the regulatory and enforcement approach to environmental protection. Specifically, VEEP has set out to build relationships between member facilities and the DEQ that seek to:

- Reflect trust and accountability;
- Foster environmental innovation and better performance;
- Facilitate a more efficient allocation of DEQ's compliance and enforcement resources; and
- Facilitate a more efficient allocation of facility environmental resources.

The ultimate goal of VEEP is to continue to move toward a more comprehensive environmental protection system, based not only on regulatory requirements but also on environmental stewardship, incentives, innovation and collaboration.

2.1 Program Objectives

The mission of the Virginia Environmental Excellence Program (VEEP) is to improve environmental performance across the Commonwealth by establishing meaningful collaborative relationships and encouraging voluntary environmental stewardship and innovation in both the regulated and non-regulated community.

There are four objectives of VEEP, which are developed to support the mission and define program success. The framework, management and implementation of the program are designed to meet the objectives.

The objectives are:

- Protection of public health and the environment;
- Increase the business value to DEQ;
- Maximize program membership; and
- Expand broad stakeholder participation.

2.2 Program Structure

Facilities may apply for program admission at any of three levels of the EMS or to the SP track.

VEEP EMS Track levels are:

- Environmental Enterprise (E2): For facilities that are interested in beginning or are in the early stages of implementing an EMS.
- Exemplary Environmental Enterprise (E3): For facilities with a fully-implemented EMS, pollution prevention program and demonstrated performance.
- Extraordinary Environmental Enterprise (E4): For facilities with a fully-implemented and independently audited EMS and that are committed to aggressive measures for continuous and sustainable environmental progress and community involvement.

For more information on the distinction between levels, see the framework as laid out on the [VEEP website](#) or the VEEP Application Review Form, available in Appendix A.

VEEP SP is a separate but complementary track to the EMS Track. VEEP SP does not require an EMS. The VEEP EMS Track provides recognition at the facility level; VEEP SP provides recognition on an organization level (including all Virginia facilities).

2.3 VEEP Staff

VEEP is managed out of the DEQ's Office of Pollution Prevention (OPP). OPP staff is responsible for program coordination, oversight, implementation and communications. OPP is also the lead for recruitment.

2.4 Regional Coordination

The DEQ regions are the front line of VEEP. As the DEQ representatives closest to the facilities, regional staff are involved in communicating with VEEP members and recruiting prospective members in their region. Regional representatives also participate in the compliance review as outlined in Sections 3.3.3 and 4.2. There is a

point of contact (POC) located in each region that the VEEP staff coordinate with on compliance matters.

Region	Staff Contact
Blue Ridge	Dave Miles
Northern	Ben Holland
Piedmont	Kyle Winter
Southwest	Jeff Hurst
Tidewater	Russell Deppe
Valley	Tiffany Severs

2.5 Integration with Media Programs and Enforcement Staff

DEQ program staff are encouraged to be involved in VEEP. Program staff may be involved in the promotion of VEEP during their interactions with the regulated community as well as in identifying facilities or sectors that are appropriate for recruitment activities.

VEEP staff also works with the DEQ enforcement staff when it is decided that including the implementation of an EMS into a supplementary environmental project (SEP) is appropriate. At this point the facility is not a potential candidate for membership in VEEP due to the compliance criteria; however, the enforcement staff may encourage the facility to work towards VEEP membership to gain not only the benefits of the EMS but participation in VEEP as well.

3.0 VEEP EMS Track

3.1 Overview

Any facility or project in the Commonwealth that impacts the environment through its operations, activities, processes or location is eligible to participate in VEEP, including private, governmental and institutional operations. The EMS Track is a facility driven program, meaning that an organization's individual facility or location submits an application to the program. VEEP does not base an organization's eligibility requirements on their size or sector; however, facilities must have a record of sustained compliance. See Section 3.3.3 for a description of 'Sustained Compliance.'

3.2 Recruiting

VEEP's recruitment strategy is to focus on qualified facilities that would benefit from membership and contribute to significant environmental improvement. Recruitment includes outreach efforts as well as the day-to-day promotion of the program by members, DEQ staff and others. Activities include participating in conferences and meetings that attract the types of facilities likely to be interested in and qualified for the program.

The regions play an important role in recruitment because they have the closest ties to prospective member facilities. Their opportunities to build trusting relationships with facilities can help persuade qualified facilities to consider VEEP membership. Regional activities also help brand the program at the local level.

Each region should provide basic information on the program when interacting with potential members during their normal DEQ activities.

To support recruitment activities, regional office staff can:

- Identify facilities that may be appropriate for the program; and
- Provide advice to VEEP staff in targeting sectors for recruitment.

Current VEEP members are a resource for recruiting their peers. During site visits, current members are asked to recommend other facilities that might be interested in participating.

3.3 Application Process

The VEEP EMS Track accepts facility applications on a rolling basis. Facilities apply for membership by completing the appropriate application for the program level that is sought. The [application](#) is made available on the OPP external website.

Applications require standard information regarding facility name and location, entity type (e.g., local, state, or federal government, manufacturer, project, etc), environmental permit numbers, and a brief description of the facility's primary functions and activities. The application contains questions designed to document that the applicant meets the program criteria applicable to the program level sought.

Applicants can request a pre-application meeting with DEQ to discuss participation requirements. VEEP staff is also available to assist facilities in determining the program level appropriate to them.

The VEEP EMS Track is designed as a facility or project based program. It is common for corporations with multiple facilities to have a corporation-wide EMS structure that applies to multiple facilities. Multiple facilities applying from the same corporation or government agency must include information specific to each facility in the application. For example, the aspects and impacts review would cover potential environmental aspects and impacts at all locations included in the application. Compliance checks are run on each facility.

3.3.1 Application Submission

Once an application is submitted, a Lead Reviewer is assigned to see the application through the process. The Lead Reviewer will contact the facility notifying them that the application review process has begun within 2 weeks of receiving the application. For the purposes of notifying the public, DEQ will post the names of the [E2](#), [E3](#) and [E4](#) facilities that are under review on its website. Facilities are notified if additional information is needed.

3.3.2 Application Review Process

Application reviews focus on ensuring that:

- The application is complete and provides sufficient detail for evaluation;
- The applicant meets the program compliance criteria and is considered a suitable entity for program membership; and
- The application demonstrates satisfaction of all criteria for the level which is being sought.

EMS Track Application Process

1. Facility submits new or renewal application to OPP Manager or VEEP@DEQ.Virginia.gov.

2. OPP Manager assigns Lead Reviewer in CEDS and updates DEQ website if necessary.
3. The Lead Reviewer evaluates the application for completion to ensure that all major elements required have been included with the application.
4. Lead Reviewer contacts the facility POC to acknowledge receipt of application within 2 weeks.
5. Lead Reviewer prepares and submits compliance review request. See Section 3.3.3 for addition information on the compliance review procedure.
6. Lead Reviewer conducts application review using the VEEP Application Review Form. If appropriate, follow up with applicant on questions and issues.
 - a. Hold application until all issues are resolved or application is rejected.
7. If compliance review is not approved the application is held until compliance is resolved or application is rejected. The application will be considered on a compliance hold.
8. If compliance review is approved and application review is approved:
 - a. E2 New & Renewal: Submit to 2nd Reviewer (Skip to step 11).
 - b. E3 & E4 New: Lead Reviewer schedules a site visit (Continue to step 10).
 - c. E3 & E4 Renewal: Submit to 2nd Reviewer (Skip to step 11).
9. Lead Reviewer schedules a site visit with facility POC.
 - a. Two VEEP staff members attend site visit with facility
 - b. VEEP site visit protocol is completed. For more information on the site visit, see Section 3.3.4.
10. Lead Reviewer drafts facility acceptance letter.
11. Application goes to 2nd Reviewer.
12. 2nd Reviewer conducts application review. If appropriate, 2nd Reviewer identifies application issues.
13. Once 2nd review is approved:
 - a. E2 and E3 acceptance/renewal letter sent by OPP Manager.
 - b. E4 renewals with clean compliance reviews can be approved and letter sent by Division of Environmental Enhancement Director.
 - c. New E4 applications and E4 renewals with compliance issues (that pass the compliance check) go to the OPP Manager to coordinate LT review, see Section 3.3.3.
14. If the LT review group approves the new or renewal application, the E4 acceptance or renewal letter is sent by the Division of Environmental Enhancement Director.
 - a. If LT does not approve the E4 application, it is held until compliance is resolved or application is rejected.

Facilities may withdraw from the application or renewal process at any time.

3.3.3 EMS Track Compliance Review

The Lead Reviewer initiates a compliance review of the applicant to determine if the applicant has a “record of sustained compliance” with environmental requirements as defined in COV §10.1-1187.1, meaning it:

- Has no criminal judgment or conviction against it or any of its key personnel within the past 5 years;
- Has no more than two significant environmental violations in the past 3 years;
- Has no unresolved Notices of Violation (NOVs) or potential violations with DEQ or one of the Boards;
- Is in compliance with any orders or other enforcement order issued by DEQ, one of the Boards or EPA; and
- Has not demonstrated an unwillingness or inability to comply with environmental protection requirements.

For additional information on the Compliance Review, see the [Procedure for Determining Compliance Eligibility for VEEP Applicants and Renewing Facilities](#).

Note that VEEP applicants are required to disclose information on criminal judgements and convictions on the VEEP EMS Track application.

Detailed steps of the compliance review process are listed in the table below.

Office	Action	Results	Estimated Timeframe
OPP	Conduct record review for the applicant. Ensure all CEDS Core facilities associated with the application are linked to the VEEP membership in CEDS. Review information available from the following sources: CEDS, ECHO, as appropriate.	Compliance review initiated by email with link to VEEP membership in CEDS sent to appropriate contacts from the RO, CO, Enforcement, Air, Land Protection and Revitalization, and Water Divisions.	Within two weeks of receiving application.
RO and CO	RO and CO contacts use CEDS link to review facility compliance and add additional information, compliance history comments (including information regarding criminal convictions, if available), pending enforcement actions, etc. RO contacts are listed in Section 2.4.	RO and CO compliance review contacts will make a recommendation to approve, deny or request additional information by entering information into the Compliance tab in the VEEP module in CEDS.	Within three weeks of receiving compliance review form.

Office	Action	Results	Estimated Timeframe
	<p>CO contacts:</p> <p><i>Division of Enforcement</i> Water Enforcement Manager: Kristen Sadtler Wetlands Enforcement Manager: Lee Crowell Land Enforcement Manager: Justin Williams Enforcement Director: Jeff Steers Air Enforcement Manager: Kerri Nicholas Stormwater Enforcement Manager: Carla Pool</p> <p><i>Other</i> Accounts Receivable Manager: Nancy Perry Water Supply Planning Program Manager: Scott Kudlas, Joseph Grist</p>	<p>RO and CO contacts can recommend an application be held while compliance issues are addressed.</p>	
LT	<p>LT subgroup meets to review compliance summary of new E4 applications and E4 renewals with compliance issues (that pass the compliance check). OPP Manager coordinates the review with the group.</p> <p>The LT subgroup includes Valerie Thomson, Sharon Baxter, Jeff Steers, the appropriate regional director and any other pertinent LT members.</p>	<p>LT makes a final determination on E4 eligibility.</p>	<p>LT request is made after 2nd review of application. No established timeframe on LT review.</p>
OPP	<p>Compile information from RO and CO POCs into a final compliance review form. As necessary, the Lead Reviewer will verify and update compliance information in the VEEP database in conjunction with the Regional POC.</p>	<p>Badge on Compliance tab in VEEP module in CEDS will indicate that the compliance check has been completed by updating the Events tab in CEDS with</p>	<p>Within two weeks of receiving final compliance feedback.</p>

Office	Action	Results	Estimated Timeframe
		the date of completion for approved compliance checks.	

An applicant will not be accepted into VEEP if it is determined that the facility did not meet program compliance criteria, or if the applicant is found to have a pattern of noncompliance inconsistent with the standards of the program.

If the application review process is held due to a compliance issue, confirm with contact requesting the hold before sharing information with applicant. There are situations when the reason for the compliance hold should not be shared with the applicant. If compliance hold will last a significant length of time, communicate with applicant that application is still pending, sharing reason if allowed.

3.3.4 Site Visits

Site visits are made to all new E3 and E4 applicants. Upon request VEEP staff will also make pre-application site visits or site visits to E2 facilities. Site visits provide an excellent opportunity for face-to-face interaction between program staff and facility contacts in a collaborative setting.

A typical site visit covers the major components of the program including: the facility's EMS, performance objectives and, if applicable, community activities. Time is also allotted for a tour of the facility, with a focus on viewing activities or projects associated with the facility's performance objectives or environmental successes. The visit is non-regulatory, however, any potential or suspected regulatory compliance issues would be brought to the facility's attention during the visit. Any potential pollution prevention opportunities would be discussed as well.

For multiple-facility applications, the site visit should include a representative sample of those locations.

3.3.5 CEDS

Facilities in the VEEP EMS Track are tracked in the Comprehensive Environmental Data System (CEDS). There is a VEEP box on the CEDS core page that indicates at what level of the program a facility is participating or if the facility is no longer in the program that links directly to the VEEP module. The application process is managed in CEDS and updates are made in real time during the application review process. As VEEP facilities withdraw or are dismissed from the program CEDS is updated at staff's earliest convenience.

VEEP SP Track data is also maintained in CEDS. As for the EMS Track, membership status information is included on the CEDS core page with links directly to CEDS.

Information on VEEP members can be queried from CEDS using the pre-designed reports in CEDS or Logi-Adhoc. Data from CEDS is available in real-time in from the CEDS reports. Logi-Adhoc reports use data from close of business the prior day.

4.0 VEEP Sustainability Partners Track

VEEP SP encourages continual, measurable, verifiable environmental improvements, and members receive positive recognition for their efforts. There are no regulatory incentives or annual permit fee discounts associated with VEEP SP.

The three basic values VEEP SP Members support are:

1. A culture of environmental sustainability;
2. Collaborative partnerships and community/stakeholder involvement; and
3. Reducing the organization's environmental footprint.

4.1 *Application Review Process*

Unlike with the EMS Track, the VEEP Sustainability Partners have a finite period for application each year. VEEP SP requires an annual application that must be submitted by the assigned program deadline. The SP Track does not require annual reporting as the membership period is only for one year.

During this time, facilities that are currently SP members are sent applications that are pre-populated with general information from the previous year. Both new and renewing applicants must complete and submit the application before the deadline. Generally, the application period runs from January through March.

Once submitted, a Lead Reviewer is assigned to each application. Section 4.2 provides details on the process for determining if an applicant has met the regulatory compliance requirement of the Sustainability Partners.

When reviewing an application the reviewer checks the application for completeness and confirms that minimum application requirements are met. The reviewer will also try to identify opportunities to clarify any portions of the application where the narrative or reporting numbers are unclear and try to make the application content best reflect program requirements. If there is an issue with the application, the reviewer will contact the applicant.

In order to stay current on Sustainability Partner application deadlines and application instructions, refer to the [VEEP Sustainability Partners Program](#) website.

Sustainability Partners Application Process

1. Organization submits application to OPP Manager by deadline.
2. Applications are split between reviewers.
3. Application is reviewed for completeness by Lead Reviewer.

4. Compliance review is conducted by Lead Reviewer. See section 4.2.
5. Application review is conducted by Lead Reviewer in CEDS, see Appendix A for a copy of the Sustainability Partners Review Form.
6. If appropriate, Lead Reviewer follows up with applicant on issues.
7. Application held until issues are resolved, or application is rejected.
8. Lead Reviewer drafts acceptance letter.
9. SP Acceptance letter is sent by the OPP Manager.

If program requirements are met the application is approved. There is no second review, site visit or LT review involved with the SP application process. The goal of the review is to have a determination of acceptance and send out the corresponding acceptance letters, (see Appendix A for the letter template), within two months of the close of the application submission deadline.

4.2 Compliance Review Process

Once the facilities that are covered under a Sustainability Partners application have been identified, that information is passed on to the appropriate Regional Office compliance contact(s), see Section 2.4 for the list of RO contacts. The Enforcement and other Central Office contacts are not included in this process.

The RO contacts are relied upon for their general awareness of ongoing noncompliance situations in their regions. RO contacts determine if any individual facility is ineligible to participate in the Sustainability Partners. Any facilities that are not eligible for participation in the program, and the related reason(s), will be documented as part of the review process.

5.0 Member Services

This section documents the approaches used by the VEEP staff to communicate with members.

5.1 Member Communications

Communications with members is through calls, emails, letters, the VEEP Newsletter and the VEEP website. VEEP staff should be available to members for information requests as well. Member events provide a more formal venue for communications between the VEEP staff and members.

Periodically, the VEEP Newsletter is distributed through email to provide members with brief updates on topics of interest, such as new and renewing members, updates on useful communication tools, spotlights on participating facilities' performance, program incentives and general pollution prevention information.

5.2 Recognition Ceremony Requests E2, E3, E4

One of the benefits offered to facilities participating in VEEP is recognition of their accomplishments and achievements. The acceptance or renewal letter communicates the option of a recognition ceremony to members. All facilities accepted into the program receive a plaque. Renewing members and members changing levels will get an electronic renewal letter and certificate listing their join and renewal dates, which can be used to update their existing plaque. Members at the E3 and E4 levels also receive a VEEP flag. Plaques are generally mailed with the acceptance letter. Flags are given only to new members during recognition ceremonies, unless requested. In addition, E4 facilities may choose to purchase a large outdoor VEEP flag. The flags are purchased directly from the vendor by the E4 member. Flags are approximately \$110 and can be purchased from:

National Capital Flag Company Inc.
100 South Quaker Lane
Alexandria, VA 22314
703-751-2411

Many facilities request a recognition ceremony to mark either their acceptance into the program, renewal or movement from one level to another. DEQ highlights recent ceremonies on the main VEEP homepage. VEEP members coordinate the ceremony with the OPP Manager, who coordinates with the regions. During the ceremony, the plaque is presented by a DEQ regional representative. When possible OPP staff also attend the ceremony. The OPP Manager will provide the regional contact attending the ceremony with VEEP Ceremony Talking Points which includes background VEEP

information, facility specific accomplishments and VEEP ceremony details. An example of a VEEP Ceremony Talking Point is included in Appendix A.

5.3 Recognition Letter Requests

VEEP members can request that DEQ send a letter announcing their membership to local officials and other interested parties (e.g., local and/or federal agencies, congressional representatives and local media).

To request a recognition letter, a member must contact a VEEP staff member and provide the contact information for the letter recipient(s). Once contacted, the VEEP staff member drafts the letter and obtains the appropriate signature and sends the letter to the specified local recipient(s) with copies to the member and the applicable Regional Office.

5.4 Information Requests

VEEP staff receives inquiries from members, applicants and various other parties. VEEP staff will respond to these inquiries in an expeditious manner. When requested, VEEP staff can assist with all steps in the application process as well as provide mentoring assistance and delivery of incentives.

5.5 Member Events

Member events are important for networking, sharing best practices, training and technical assistance. As appropriate, VEEP may sponsor or co-sponsor webinars on technical subjects, trainings or conferences. Member events are communicated on the website, through the VEEP Newsletter and via emails.

6.0 Incentives for Member Facilities

VEEP EMS Track and SP members all receive positive recognition from DEQ, but the following incentives are available only to facilities participating in the EMS Track of VEEP. Depending on a facility's level of participation (E2, E3 or E4), certain regulatory incentives may become available.

6.1 *Permit Fee Discounts for Water and Waste Permittees*

Facilities that have met the VEEP EMS Track program requirements are considered in good standing and eligible for permit fee discounts (solid waste, hazardous waste and water). The process involves coordination between the appropriate media, VEEP staff and the Office of Financial Management. In 2004, DEQ was directed by the Virginia General Assembly to revise its water and waste permit fee structures to fund the agency's permitting activities. The permit fee regulations, which include discounts on annual permit fees for facilities participating in VEEP, went into effect September 8, 2004. The discounts became effective in 2005 and are dependent on the facility's acceptance and continued participation in the program. For a member to be eligible for permit discounts, they must be in good standing at the end of the billing year and submit a VEEP report covering the billing year. This is true regardless of their status during the billing process.

The specific discounts for VEEP participants included in the regulations are as follows:

Solid Waste Management: Participating E2 facilities, for the first three years of membership, will receive potentially up to a 10% discount on annual fees; E3 & E4 facilities will receive potentially up to a 20% discount. The total of all discounts cannot exceed \$140,000 annually for all solid waste facilities.

Hazardous Waste Management: Participating E2 facilities, for the first three years of membership, will receive potentially up to a 5% discount; E3 & E4 facilities will receive potentially up to a 10% discount. The total of all discounts will not exceed a total of \$26,000 annually.

Water: Participating E2 facilities, for the first three years of membership, will receive potentially up to a 2% discount; E3 & E4 facilities will receive potentially up to a 5% discount. The total of all discounts will not exceed a total of \$64,000 annually.

The Accounts Receivable Manager generates a timeline for permit billing and distributes it to all parties. Media specialist for solid waste, hazardous waste and water compile lists of all permits that will be billed, which are entered onto staging tables in CEDS. VEEP Staff will receive a notification when the tables are finalized and ready for review in CEDS. The VEEP Discounts tab in the Annual Billing Utilities module in CEDS populates a list of permits being billed that are eligible for VEEP discounts. VEEP Staff

review the draft list, comparing it to permits that received discounts the prior year, removing members that did not submit annual reports and ensuring that changes in membership status are correctly reflected.

Discounted permits should indicate the level of the program at which the discount should be calculated. This is automatically done in CEDS and reflects membership level as of December 31 of the prior year. Once VEEP Staff review and finalize the list of permits eligible for discounts, the list is submitted to finance via CEDS. The Accounts Receivable Manager reviews the list and if there are no issues, the finalized discount lists are sent to the Director of Financial Management. The Office of Financial Management calculates the discounts and mails permit bills.

Media contacts are listed below:

Solid waste:	Director of Office of Waste Programs Sanjay Thirunagari
Hazardous waste:	Director of Office of Waste Programs Sanjay Thirunagari
Water:	Office of VPDES Permits and Compliance Curtis Linderman

6.2 Alternative Compliance Methods

As outlined in Section 10.1-1187.6 of the Code of Virginia, the Air Pollution Control Board, the State Water Control Board and the Waste Management Board “may grant alternative compliance methods to the regulations adopted pursuant to their authorities” for VEEP E3 and E4 facilities considered to be in good standing with the program. Potential alternative compliance methods (ACM) outlined by the law include “changes to monitoring and reporting requirements and schedules, streamlined submission requirements for permit renewals, the ability to make certain operational changes without prior approval, and other changes that would not increase a facility’s impact on the environment.”

The facility proposing the ACM must demonstrate that the proposed method will meet the purpose of the applicable regulatory standard through increased reliability, efficiency or cost effectiveness and provide environmental protection equal to or greater than that provided by the applicable regulatory standard. ACMs that would alter ambient air quality standards, ground water protection standards or water quality standards will not be approved. Additionally, ACMs that increase pollutants released to the environment, increase impacts to state waters or otherwise result in a loss of wetland acreage will not be approved.

In order for DEQ to review requests from facilities for ACMs, it is critical that all information necessary for the agency to evaluate the appropriateness and feasibility of the proposed alternative approach be submitted. A facility’s submittal should address each section of the request form and explain in detail the proposed ACM, including a

demonstration showing how the ACM will meet the intent and be equivalent to or exceed the established standard from which relief is sought. This may require submittal of both documentation and references to demonstrate that the intent is met and to support their claim of equivalence.

DEQ does not provide a list of potential ACMs. It is the responsibility of the requesting facility to demonstrate that the intent and equivalency of their proposal is consistent with currently established compliance methods. Members requesting the use of an ACM must submit the Alternative Compliance Method Request Form.

6.3 *Single Point of Contact*

VEEP EMS Track members can receive, upon request, a single point of contact at DEQ to facilitate communications with the Agency. If requested, VEEP staff will work with the applicable regional office to establish a point of contact.

7.0 Annual Performance Reporting

Annual performance reporting is a vital aspect of the EMS Track membership. The annual report documents the performance and progress of its members as well as verifying that the members continue to meet program criteria.

7.1 Annual Report Overview

VEEP EMS Track members are required to submit annual reports by April 1 for the previous calendar year. Annual Reports include data on the environmental indicators selected by the applicant in its application. Required data begins with a baseline, developed from the year the facility was accepted into VEEP or renewed its membership. Reports are prepared using standardized units and DEQ provides a list of common conversions. VEEP's online reporting system using the External Portal allows for online submittal of Annual Reports and provides a tutorial. It also allows facilities that have missed the reporting deadline to submit a report. Facilities that miss the reporting deadline but still submit a report before VEEP permit discounts are calculated can be eligible to receive discounts.

The primary purpose of the Annual Report is for members to demonstrate that they continue to meet program criteria and are making good faith efforts toward meeting performance commitments. Additionally, report data allows DEQ to analyze and communicate the environmental improvements that members are making. The information that members provide in their reports should be complete, transparent and accurate.

Members that do not submit an annual report risk loss of program benefits and having their membership revoked.

7.2 Annual Performance Reporting Review Process

7.2.1 Reporting Website Preparation

The target date for having VEEP EMS Track reporting enabled is February 1. At this time VEEP EMS Track members should be able to submit their report(s) for the previous calendar year.

7.2.2 Report Submission

Once the report is begun a facility's report status is 'Draft'. Once a report is completed and submitted for review the status is 'Certified'. Lastly, when the report is reviewed and determined to have met the reporting requirements the report status is changed to 'Approved'.

7.2.3 Report Review

When a report is submitted, VEEP staff conducts a review to determine whether the report is complete or if there are outstanding issues to be resolved. Reviewers evaluate the report's clarity, completeness and/or accuracy. Reporting issues may include missing or insufficient data, non-standard reporting or major changes in performance commitments as documented in the member's application. Qualitative issues to note in the review include assessment and audit results, progress toward achieving commitments and extent of public outreach activities, if required. VEEP staff follow-up with the facility to resolve issues if necessary.

7.2.4 Report Acceptance Procedures

Once any issues are resolved VEEP staff will inform the facility contact that the report has been approved and change the report's status to 'Approved'.

7.2.5 Facilities that Fail to Submit an Annual Report

If DEQ does not receive an annual report from a member, the member will be contacted by a VEEP staff via email or phone. If a report is not received the facility will lose eligibility for VEEP benefits and possibly have membership terminated. Members are not eligible for permit discounts if an acceptable report is not received.

7.2.6 Aggregate Report

Once it is believed that all facilities that are going to submit a report have reported, VEEP staff can begin to calculate the cumulative reporting numbers for each reporting commitment. This report is assembled and completed in time to use in the Office of Pollution Prevention Annual Report. The process for assembling the VEEP Aggregate Report requires assistance from OIS and final validation of reporting numbers by VEEP Staff.

8.0 Membership Status

8.1 Membership Renewal

VEEP EMS Track facilities are required to renew their participation in the program every three years. Due dates are quarterly, based on time of the last acceptance or renewal: January 1, April 1, July 1 and October 1. All members will be invited to renew their membership.

Procedures for membership renewal are the same as for original applications with the exception of the site visit. Members will be informed if they are accepted for renewal. Members not accepted for renewal will receive a letter informing them of the termination of their membership.

VEEP SP Track members are required to renew annually. Renewing members are sent the updated application when it becomes available.

To be in good standing, a member must continue to meet the program criteria and demonstrate good faith improvement toward meeting commitments or offer explanations for why progress has not been made. E4 facilities are expected to make continuous and sustainable environmental progress and maintain community involvement.

8.2 Membership Withdrawal

Members may choose to withdraw from the program at any time. The member should contact VEEP staff by letter or email to inform them of their desire to withdraw from the program. This request will be saved and they will be removed from the website and CEDS as appropriate.

8.3 Membership Termination

Termination or removal from VEEP may occur in the following situations:

- Failure to submit the annual report;
- Change in compliance status such that the facility no longer is considered to have a record of sustained compliance;
- Failure of the facility to meet its commitments to the program; or
- Failure to submit renewal applications in a timely manner.

A recommendation to terminate membership will be made by the Office of Pollution Prevention to the Director of the Division of Environmental Enhancement. Applicants will have an opportunity to request a reconsideration of a termination decision by the

Director of the Division of Environmental Enhancement. If a facility is terminated from the program, it must reapply to be considered for participation in the future.

8.4 Membership Suspension

Membership Suspension identifies current and renewing VEEP members that are “not in good standing” with VEEP requirements. Current and renewing members can move to suspension if they fail to maintain a record of sustained compliance, fail to resolve an alleged environmental violation within 180 days or fail to meet the requirements or criteria for participation (§10.1-1187.4.B.). This relates to members that have not maintained sustained compliance as defined by Section §10.1-1187.1. This can include renewing members that are on a compliance hold due to compliance issues. Facilities whose membership is suspended are not eligible for program incentives such as annual permit fee discounts or ACM.

Membership Suspension identifies members as “not in good standing” and not eligible for permit fee discounts or other program benefits. There is a distinction between members on a compliance hold awaiting the results of an inspection and those that have a confirmed regulatory issue and are working to return to compliance. Members on compliance hold while awaiting inspection results or possible regulatory actions are eligible for discounts and other program benefits. A facility on compliance hold or suspended VEEP membership will have its renewal application to VEEP delayed until, at a minimum, all requirements and criteria for membership have been met.

Applicants (new or renewing) that are currently on a compliance hold may transition to suspension. At that time, any facility applying or renewing to participate in VEEP and on a compliance hold will have a new Compliance Hold Event entered in the Events Tab of the VEEP Module in CEDS and the description of that Compliance Hold Event will be ‘Membership Suspension’. Also any facilities corresponding to an applicant or renewing member that is suspended will have their facility (good standing) status changed to ‘no’. Lastly, on December 31 of every year a report will be run identifying the membership status of all active VEEP members and applicants. Those facilities not in good standing will be ineligible for permit fee discounts.

9.0 Information/Data Management

9.1 Overview

VEEP uses CEDS, ECM, a performance data tracking system, and various spreadsheets and documents located the shared U:drive to track membership and performance data. Records are maintained in accordance with the Records Retention Schedule.

9.2 Website

Both internal and external stakeholders rely heavily on the VEEP website as a source for information, resources and tools for understanding VEEP. The website contains general information and background on the program, including current information on program criteria; member benefits; program members and applicants; and resources for applicants and members.

9.3 Database

All VEEP applications are tracked using the VEEP Module in CEDS, established in 2016. Additions, deletions and changes in member status are tracked in this database. This resource is essential in supporting processes like tracking renewal schedules and identifying program members that are eligible for incentives.

9.4 Archives

The U:drive also houses materials that supply historical records of the larger program and related supporting materials, including information on outreach and incentives.

Applications approved on or after June 15, 2016 are stored in Enterprise Content Manager (ECM). Ideally, hard copies of these applications will be scanned and the electronic copy entered into ECM. If application documents cannot be scanned, the documents will be stored by the OPP.

Old records will be purged per VEEP's ECM retention schedule. This includes hard copies and records stored on the U: drive. Applications currently under review will be stored on the U:drive until these files are no longer relevant because the active application documents have transitioned to ECM.

The titles of VEEP application documents are standardized to make retrieval and identification In ECM more efficient. Each title will consist of 'Facility Name – Document Description-Approval Letter Date'. Below is a list of Document Descriptions:

- App
- App Review
- Approval Letter
- Comp Approved
- Comp Hold
- Correspondence
- Dismissal
- EMS
- EMS Supporting Documents
- P2
- Site Visit
- Withdrawal

Some examples of document titles would be: ABB Inc App 9-23-16.docx or ABB Inc Comp Approved 9-23-16.pdf

Keywords will be added into ECM metadata. This will aid in searching documents.
Keywords List (use all that apply):

- E2
- E3
- E4
- EMS
- New
- Renewal
- SP
- VEEP
- Year

The ECM QA/QC process will occur as needed. Typically when there are 25 – 40 documents available for transfer into ECM they will be entered and then a QA/QC review will be completed according to the established sampling rate. See Section 9.5 for more details.

9.5 ECM QA/QC Process & Tracking

Both VEEP EMS Track and Sustainability Partners (SP) documents related to new applications, renewals and changes of membership status must be transferred to ECM.

Outlined below is the system for tracking VEEP document transfers to ECM and the QA/QC of those documents.

1. As VEEP application reviews are completed the reviewer will title and date documents to be entered into ECM per guidance in the VEEP Operations Manual, Section 9.4 Archives.
2. Once all pertinent documents related to a VEEP EMS or SP application have been properly titled they should be moved to the ECM Uploads Pending folder and be stored in a subfolder titled with the VEEP member's name.
3. As each subfolder is added to ECM Uploads Pending folder the 'Tracking' tab in VEEP ECM Tracking and QAQC.xlsx should also be updated by the Application Reviewer.
4. As soon as ten VEEP member applications or renewals are ready for upload into ECM the acting Administrative Assistant should be notified so that the documents can be added to ECM.
5. The Administrative Assistant will update the VEEP ECM Tracking and QAQC.xlsx 'Tracking' tab. This tab will be the resource for determining if a VEEP Member's application documents have been transferred to ECM.
6. The Administrative Assistant will then find the next tab titled 'Add Date' in VEEP ECM Tracking and QAQC.xlsx and add the date the files are being added to ECM to that tab (Example: 'Add Date 3-6-17').
7. The First four columns of the newly updated 'Add Date' spreadsheet will then be updated by the Administrative Assistant. These columns are; **Case ID/ VEEP#, Title, Added By** and **Add Date**.
8. Once the spreadsheet has been updated, the person responsible for QA/QC should be contacted that files have been added to ECM and are ready for QA/QC.
9. The files and related subfolders that have just been added to ECM should be deleted from ECM Uploads Pending by the person responsible for QA/QC.
10. QA/QC will be conducted in accordance with QAQC_Manual_Final_6-30-09.docx
11. The person responsible for QA/QC will follow up on any issues that negatively impacted scanning or metadata error rates during QA/QC process.

Appendix A: Links to VEEP Documents & Templates

VEEP EMS Track

- EMS Track Electronic Approval Notification
- EMS Track Acceptance & Renewal Letter Template
- EMS Track Application Review Form
- E3/E4 VEEP Site Visit Protocol
- Third Party Audit Guidance for Mentors
- Alternative Compliance Method Request Form & Instructions
- EMS Track Ceremony Talking Points
- Template for Press Releases

VEEP SP Track

- VEEP SP Review Form
- SP Acceptance & Renewal Letter Template

EMS Track Electronic Approval Notification

Dear *Mr. or Ms. Name*:

Congratulations! The *Facility Name* has renewed participation as a *VEEP Level (EX)* participant in the Virginia Environmental Excellence Program (VEEP). Your updated certificate and renewal materials are attached.

If possible, please add a [link to VEEP](#) or the VEEP logo to your website to promote the program to your peers.

If you would like to request a plaque or a recognition ceremony, please contact Meghann Quinn at (804) 698-4021 or meghann.quinn@deq.virginia.gov.

Example Acceptance & Renewal Letters

E2 Acceptance Letter

Current DEQ letterhead

[Date]

Name

Title

Facility

Address Line 1

Address Line 2

RE: Virginia Environmental Excellence Program
E2-XX Facility Name

Dear *Mr. or Ms. Name*:

Congratulations! The *Facility Name* has been accepted as an Environmental Enterprise (E2) participant in the Virginia Environmental Excellence Program (VEEP). As an E2 participant, the facility is entitled to the following benefits: public recognition, permit fee discounts and a single point-of-contact within the Department of Environmental Quality (DEQ).

The facility will be required to report annually to DEQ on progress towards implementation of the environmental management system and pollution prevention program. Your next annual report will be due by April 1, 20XX, for calendar year 20XX-1. Also, as a VEEP member we ask that you help promote the program. If possible, please add a link to VEEP or the VEEP logo to your website to promote the program to your peers.

Your membership materials are enclosed. If you would like a recognition ceremony, please contact me at (804) 698-4021 or meghann.quinn@deq.virginia.gov.

Sincerely,

Meghann Quinn, Manager
Office of Pollution Prevention

Enclosure

cc: *Name*, Regional Director, *Name* Regional Office
Regional Office abbreviation Permit Files: *Permits*

E2 Renewal Letter

Current DEQ letterhead

[Date]

Name

Title

Facility

Address Line 1

Address Line 2

RE: Virginia Environmental Excellence Program
E2-XX Facility Name

Dear *Mr. or Ms. Name*:

Congratulations! The *Facility Name* has renewed participation as an Environmental Enterprise (E2) participant in the Virginia Environmental Excellence Program (VEEP). As an E2 participant, the facility is entitled to the following benefits: public recognition and a single point-of-contact within the Department of Environmental Quality (DEQ).

The facility will be required to report annually to DEQ on progress towards implementation of the environmental management system and pollution prevention program. Your next annual report will be due by April 1, 20XX, for calendar year 20XX-1. Also, as a VEEP member we ask that you help promote the program. If possible, please add a link to VEEP or the VEEP logo to your website to promote the program to your peers.

Your renewal materials are enclosed. If you would like a recognition ceremony, please contact me at (804) 698-4021 or meghann.quinn@deq.virginia.gov.

Sincerely,

Meghann Quinn, Manager
Office of Pollution Prevention

Enclosure

cc: *Name*, Regional Director, *Name* Regional Office
Regional Office abbreviation Permit Files: *Permits*

E3 Acceptance Letter

Current DEQ letterhead

[Date]

Name

Title

Facility

Address Line 1

Address Line 2

RE: Virginia Environmental Excellence Program
E2-XX Facility Name

Dear *Mr. or Ms. Name*:

Congratulations! The *Facility Name* has been accepted as an Exemplary Environmental Enterprise (E3) participant in the Virginia Environmental Excellence Program (VEEP). As an E3 participant, the facility is entitled to the following benefits: public recognition, permit fee discounts, and a single point-of-contact within the Department of Environmental Quality (DEQ). In addition, participation in the VEEP at the E3 level may provide the facility with certain types of administrative flexibility with environmental regulations.

The facility will be required to report annually to DEQ on progress towards implementation of the environmental management system and pollution prevention program. Your next annual report will be due by April 1, 20XX, for calendar year 20XX-1. Also, as a VEEP member we ask that you help promote the program. If possible, please add a link to VEEP or the VEEP logo to your website to promote the program to your peers.

Your membership materials are enclosed. If you would like a recognition ceremony, please contact me at (804) 698-4021 or meghann.quinn@deq.virginia.gov.

Sincerely,

Meghann Quinn, Manager
Office of Pollution Prevention

Enclosure

cc: *Name*, Regional Director, *Name* Regional Office
Regional Office abbreviation Permit Files: *Permits*

E3 Renewal Letter

Current DEQ letterhead

[Date]

Name

Title

Facility

Address Line 1

Address Line 2

RE: Virginia Environmental Excellence Program
E2-XX Facility Name

Dear *Mr. or Ms. Name*:

Congratulations! The *Facility Name* has renewed participation as an Exemplary Environmental Enterprise (E3) participant in the Virginia Environmental Excellence Program (VEEP). As an E3 participant, the facility is entitled to the following benefits: public recognition, permit fee discounts, and a single point-of-contact within the Department of Environmental Quality (DEQ). In addition, participation in the VEEP at the E3 level may provide the facility with certain types of administrative flexibility with environmental regulations.

The facility will be required to report annually to DEQ on progress towards implementation of the environmental management system and pollution prevention program. Your next annual report will be due by April 1, 20XX, for calendar year 20XX-1. Also, as a VEEP member we ask that you help promote the program. If possible, please add a link to VEEP or the VEEP logo to your website to promote the program to your peers.

Your renewal materials are enclosed. If you would like a recognition ceremony, please contact me at (804) 698-4021 or meghann.quinn@deq.virginia.gov.

Sincerely,

Meghann Quinn, Manager
Office of Pollution Prevention

Enclosure

cc: *Name*, Regional Director, *Name* Regional Office
Regional Office abbreviation Permit Files: *Permits*

E4 Acceptance Letter

Current DEQ letterhead

[Date]

Name

Title

Facility

Address Line 1

Address Line 2

RE: Virginia Environmental Excellence Program
E2-XX Facility Name

Dear *Mr. or Ms. Name*:

Congratulations! The *Facility Name* has been accepted as an Extraordinary Environmental Enterprise (E4) participant in the Virginia Environmental Excellence Program (VEEP). As an E4 participant, the facility is entitled to the following benefits: public recognition, permit fee discounts, and a single point-of-contact within the Department of Environmental Quality (DEQ). In addition, participation in the VEEP at the E4 level may provide the facility with certain types of administrative flexibility with environmental regulations.

The facility will be required to report annually to DEQ on progress towards implementation of the environmental management system and pollution prevention program. Your next annual report will be due by April 1, 20XX, for calendar year 20XX-1. Also, as a VEEP member we ask that you help promote the program. If possible, please add a link to VEEP or the VEEP logo to your website to promote the program to your peers.

Your membership materials are enclosed. If you would like a recognition ceremony, please contact me at (804) 698-4021 or meghann.quinn@deq.virginia.gov.

Sincerely,

Meghann Quinn, Manager
Office of Pollution Prevention

Enclosure

cc: *Name*, Regional Director, *Name* Regional Office
Regional Office abbreviation Permit Files: *Permits*
Facility Contact and E-mail address

E4 Renewal Letter

Current DEQ letterhead

[Date]

Name

Title

Facility

Address Line 1

Address Line 2

RE: Virginia Environmental Excellence Program
E2-XX Facility Name

Dear *Mr. or Ms. Name*:

Congratulations! The *Facility Name* has renewed participation as an Extraordinary Environmental Enterprise (E4) participant in the Virginia Environmental Excellence Program (VEEP). As an E4 participant, the facility is entitled to the following benefits: public recognition, permit fee discounts, and a single point-of-contact within the Department of Environmental Quality (DEQ). In addition, participation in the VEEP at the E4 level may provide the facility with certain types of administrative flexibility with environmental regulations.

The facility will be required to report annually to DEQ on progress towards implementation of the environmental management system and pollution prevention program. Your next annual report will be due by April 1, 20XX, for calendar year 20XX-1. Also, as a VEEP member we ask that you help promote the program. If possible, please add a link to VEEP or the VEEP logo to your website to promote the program to your peers.

Your renewal materials are enclosed. If you would like a recognition ceremony, please contact me at (804) 698-4021 or meghann.quinn@deq.virginia.gov.

Sincerely,

Meghann Quinn, Manager
Office of Pollution Prevention

Enclosure

cc: *Name*, Regional Director, *Name* Regional Office
Regional Office abbreviation Permit Files: *Permits*
Facility Contact and E-mail address

VEEP Application Review Comments



Facility Name:	Date:
Reviewer:	APPLICATION:
Environmental Policy Statement	<input type="checkbox"/> Includes/stresses compliance, pollution prevention, training, communication & continuous improvement <input type="checkbox"/> Elements in policy statement evident in EMS
	<u>Comments:</u>
Environmental Impacts	<input type="checkbox"/> Comprehensive list of impacts/aspects <input type="checkbox"/> Method for determining <i>significant</i> impacts/aspects <input type="checkbox"/> Impact/aspect review process outlined <input type="checkbox"/> Process defined for reevaluation
	<u>Comments:</u>
EMS Objectives and Targets	<input type="checkbox"/> Goals (or objectives) address significant impacts/aspects <input type="checkbox"/> Tasks or projects planned for addressing each goal/objective with a targeted schedule for implementation <input type="checkbox"/> Ideally, objectives and targets should address VEEP commitments for tracking "Environmental Results"
	<u>Comments:</u>
Pollution Prevention Activities	<input type="checkbox"/> Dedicated p2 section listing projects & accomplishments <input type="checkbox"/> Reduction numbers and cost savings <input type="checkbox"/> Address P2 activities outside of significant impacts/aspects
	<u>Comments:</u>
For E3 & E4 Facilities Only:	
Environmental Legal Requirements	<input type="checkbox"/> System for learning about legal requirements & changes in regulations
	<u>Comments:</u>
Roles, Responsibilities, & Authorities	<input type="checkbox"/> Assignments for projects, tasks or reporting responsibilities <input type="checkbox"/> Upper management involvement or review
	<u>Comments:</u>
Reporting & Record-Keeping	<input type="checkbox"/> System for effective tracking of the EMS
	<u>Comments:</u>
Training	<input type="checkbox"/> Systematic approach ensuring all employees have role in EMS
	<u>Comments:</u>

Emergency Response Procedures	<input type="checkbox"/> Emergency management program coordinated with local EMS efforts
	<u>Comments:</u>
Voluntary Self-Assessments	<input type="checkbox"/> Regular self-assessments
	<input type="checkbox"/> Corrective action plans
Communication	<input type="checkbox"/> Internal communication
	<input type="checkbox"/> External communication
For E4 Facilities Only:	
3rd Party Verification	<input type="checkbox"/> Implemented and completed at least one full cycle of an EMS as verified by an independent third party
	<u>Comments:</u>
Commitment to Continuous and Sustainable Environmental Progress & Community Involvement	<u>Comments:</u>
For all VEEP Applicants:	
Comments Related to Compliance Issues	<input type="checkbox"/> DEQ Compliance Check Completed <input type="checkbox"/> EPA Compliance Check Completed
	<u>OPP Comment:</u>
	<u>Region:</u> <u>Enforcement:</u> <u>Waste:</u>
Other Noteworthy/ Significant Activities	<u>Comments:</u>



E3/E4 VEEP SITE VISIT PROTOCOL FOR EVALUATING PERFORMANCE

GENERAL INFORMATION

Date of Visit: _____

Site Visit Conducted By: _____

Facility Name: _____

Facility Location: _____

Facility Personnel Participating:

Facility description (e.g., size, number of employees, principal activities)

Notes:

EMS information

EMS implementation date? _____

EMS Assessment done? ___ YES ___ NO Date of assessment: _____

Type of EMS Assessment (check one or both)

_____ Third/Independent Party Assessment - Who conducted it and what standards were used? (E.g., ISO 14001, RC 14001, CEMP, PT Independent Assessment Protocol, etc.) _____

_____ Self-Assessment - Who conducted it and what standards were used? (E.g., ISO 14001, RC 14001, CEMP, PT Independent Assessment Protocol, etc.) _____

Are there any sections of the application or EMS which need to be discussed regarding applicability to the Virginia Environmental Excellence Program?

Notes:

Noteworthy pollution prevention efforts and environmental management projects?

Notes:

Environmental Performance

Environmental Performance Indicator Worksheet: Indicate which of these environmental performance indicators are being measured (check all that apply).

Air Emissions

- GHGs
- VOCs
- NOx
- SOx
- PM
- Toxics
- Other

Energy Use

- Energy generated
- On-site (natural gas, fuel oil, etc)
- Purchased electricity
- Renewable energy Use
- Total energy
- Other energy use

Water Discharges

- BOD
- COD
- Nutrients
- Sediment
- Suspended Solids
- Toxics
- Other

Water Use

- Reclaimed/recycled water use
- Total water use
- Virgin water use
- Other

Waste

- Hazardous waste disposed
- Hazardous waste recycled
- Non-hazardous waste disposed
- Non-hazardous waste recycled
- Waste to energy
- Other waste

Material Use

- Hazardous Material Use
- Non-Hazardous Material Use
- Recycled material use
- Other material use

Land Use

- Land preserved
- Land restored
- Other land use

Product Environmental Performance

- Packaging waste
- Projected product end of life waste
- Projected product energy use
- Projected product water use

Reporting commitment information

1. Facility has appropriate baseline information and a logical framework for reporting commitments.

Yes No Didn't evaluate Not enough information
(if you answer anything but "yes," explain in explanation field below)

2. Reporting commitments are appropriate given its overall environmental footprint, history of performance, any local or regional concerns, etc.

Yes No Didn't evaluate Not enough information
(if you answer anything but "yes," explain in explanation field below)

3. The facility has developed action plans to achieve commitments.

Yes No Didn't evaluate Not enough information
(if you answer anything but "yes," explain in explanation field below)

Notes:

Scope of the EMS and Facility "Fence line"

EMS scope is consistent with the facility description in the application and the layout of the facility as observed during the site visit.

Yes No Didn't evaluate Not enough information
(if you answer anything but "yes," explain in explanation field below)

Notes

Sustainability and public outreach

1. The facility acknowledges and supports the concept of environmental sustainability.

Yes No Didn't evaluate Not enough information

(if you answer is other than "yes," explain in field below)

2. The facility actively goes beyond its fence line to assist the community and peers with efforts to improve environmental quality.

Yes No Didn't evaluate Not enough information

(explain efforts in field below)

3. The facility participates in programs that recognize environmental efforts.

Yes No Didn't evaluate

(list environmental programs applied to and recognition achieved in field below)

Approach: Discuss the facility's public (community) outreach program.

Determine if:

- Communication is proactive and appropriate.
- Member informs the public about their EMS and environmental goals.
- Participation in: Adopt-A-Stream, Adopt-A-Highway, other
- Participation in or support of an environmental conference.
- Mentor local businesses on EMS
- Assist peers with environmental issues
- Host or support an event that raises environmental awareness (Example: Earth Day)
- Partner with a local group (Example: Cub Scouts) for a one day river or park, etc. clean up.
- Participate in and promote environmental awareness at town/business meetings
- Participate in regional environmental groups like V-REMS

Notes:

Facility feedback

Approach: Discuss VEEP and solicit feedback on the program; establish communications channels.

Solicit Feedback On:

- Additional benefits and incentives the facility would like.
- Benefits the member thinks would help attract new members.
- Specific environmental issues for which the facility would like assistance from EPA or the State.
- Parts of the program that work well; things the member would change.
- Parts of the site visit process that work well; things the member would change.

Establish Communication Channels:

- Identify useful contacts at state and federal level
- Encourage outreach to community group(s) and participation.

Determine if there any businesses or facilities that would be a good candidate for VEEP:

- Identify companies that the facility POC has contact with that would be good for the program.

Notes:

SITE VISIT SUMMARY

Does the facility meet the requirements of VEEP?

E3 Yes No

E4 Yes No

Comments:

VEEP THIRD PARTY AUDIT GUIDANCE FOR MENTORS



PURPOSE

The purpose of this document is to provide guidance for Virginia facilities that are seeking a third party audit of their EMS for VEEP membership from a mentor or other volunteer auditor. The guidance also addresses the minimum of what an auditor should address in the course of a third party audit. When a third party audit is conducted outside of the ISO 14001 certification process, the audit should focus on conformity to that individual facility's procedures and requirements. Third party EMS audits are conducted to determine conformance of the system and are not compliance audits.

DEFINITIONS

Audit: A systematic, independent, and documented process to: obtain audit evidence; evaluate it objectively; and determine the extent to which audit criteria are fulfilled.

Audit Conclusion/Recommendation: Outcome of an audit provided by the auditor/audit team after consideration of the audit objectives and all audit findings.

Findings: Results of the evaluation of the collected audit evidence against audit criteria. Can indicate conformity or non-compliance with audit criteria or opportunity for improvement.

Major Nonconformity: Absence or total breakdown of a system to meet a requirement.

Minor Nonconformity: Single observed lapse or isolated incident. Failure to comply with a requirement which is not likely to result in management system failure.

Opportunity for Improvement: A conforming practice that is weak and could result in future nonconformities.

VEEP REQUIREMENTS

E4 facilities are required to submit documentation showing that they have completed at least one full cycle of an EMS which has been verified to be effective and meet or exceed E4 requirements by an unrelated third party. DEQ defines the term "unrelated third party" in the context of VEEP to mean that the EMS auditor(s) is not directly employed by the applying facility nor have they played a substantive role in developing the facility's EMS.

In addition, DEQ requires that third party auditors be qualified for their role in assessing the EMS by meeting the requirements below:

🌱 Qualifications for Lead Auditor:

- Training: 32 to 40-hour RABQSA Accredited ISO 14001 EMS Lead Auditor Course or IPC (formerly IATCA) EMS Lead Auditor Courses (must receive passing grade on course examination)
- Work Experience: Five years of work experience in environmental management, environmental science and technology, environmental regulation or related field.

🌱 Qualifications for Audit Team Members:

- Training: Same as qualifications for Lead Auditor
- Work Experience: Three years of work experience in environmental management, environmental science and technology, environmental regulation or a related field.

GUIDANCE FOR AUDITORS & AUDITEE

Principles of Auditing:

- Principles relating to auditors:
 - Ethical Conduct: This includes reliability, honesty, confidentiality, and discretion.
 - Fair Presentation: The obligation to report truthfully and accurately.
 - Due Professional Care: Applying diligence and judgment in auditing.
- Principles relating to the audit:
 - Independence: Impartiality of the audit and objectivity of the audit conclusions.
 - Evidence-Based Approach: Rational method for reaching reliable audit conclusions.

Audit Activities and Process:

- Audit is initiated: Auditor and auditee determine audit objectives, scope, and criteria.
- Auditor conducts document review: Note that this can be done off-site.
- Auditor prepares for and conducts on-site audit:
 - Including: opening meeting, collecting and verifying information, interviewing staff, generating findings, preparing audit conclusions, and conducting a closing meeting.
- Auditor prepares and distributes the audit report:
 - Auditor indicates if findings are conformities, nonconformities, or opportunities for improvement. Nonconformities may be graded as “minor” or “major”.
 - Auditor should specify nonconformities by location, functions, or processes. The audit report should include all nonconformities and opportunities for improvement.

Common Audit Components:

- Review the EMS Manual and other EMS documentation.
 - Not all procedures have to be documented.
 - If a certain process isn’t documented, the auditor may need to interview more people to ensure that the issue is handled consistently.
- Review the Aspects & Impacts.
 - Significant aspects may help an auditor determine where to focus.
- Interview Staff.
 - Interviewing staff will help determine the effectiveness of the current procedures.

By the end of the audit, auditors should have a clear sense of the answers to these questions:

- Do they do what they say?
- Do they say what they do?
- Do they meet all requirements?
- Is the EMS effective at handling their risks?
- Is there continual improvement?

Audit Report:

- The audit report should clearly identify if the EMS is considered effective. The audit report should address audit conclusions on the extent of conformity and the effective implementation of the management system. Examples of conclusions include:
 - Effective without conditions (no nonconformities);
 - Effective with minor nonconformities addressed in a corrective action plan; or
 - Not effective at this time due to major nonconformity.

**Virginia Department of Environmental Quality Alternative Compliance Methods
Request Form for VEEP E3 & E4 Facilities**

Facility Name:

Facility Contact:

Contact Phone and Email Address:

Type of VEEP Facility: E3 ____ E4 ____

What is the current regulatory requirement that you are seeking to change and what process are you currently going through to meet that requirement?

What is the alternative approach you are proposing? (Include timeframe implications for other environmental media or the community, etc.)

Which permits (if any) at the facility will be affected by the proposed approach?

What are the expected benefits of the proposed approach to the facility?

What are the expected benefits of the proposed approach to the environment? Explain how the proposed change would reduce one or more of the major environmental impacts described in your facility's EMS.

Instructions for Completing DEQ Alternative Compliance Methods Form

As outlined in Section 10.1-1187.6 of the Code of Virginia, the Air Pollution Control Board, the State Water Control Board and the Waste Management Board “may grant alternative compliance methods to the regulations adopted pursuant to their authorities” for Virginia Environmental Excellence Program E3 and E4 facilities considered to be in good standing with the program. Potential alternative compliance methods (ACM) outlined by the law include “changes to monitoring and reporting requirements and schedules, streamlined submission requirements for permit renewals, the ability to make certain operational changes without prior approval, and other changes that would not increase a facility’s impact on the environment”.

The facility proposing the ACM must demonstrate that the proposed method will meet the purpose of the applicable regulatory standard through increased reliability, efficiency or cost effectiveness and provide environmental protection equal to or greater than that provided by the applicable regulatory standard. ACMs that would alter ambient air quality standards, ground water protection standards or water quality standards will not be approved. Additionally, ACMs that increase pollutants released to the environment, increase impacts to state waters, or otherwise result in a loss of wetland acreage will not be approved.

In order for DEQ to review requests from facilities for ACMs, it is critical that all information necessary for the agency to evaluate the appropriateness and feasibility of the proposed alternative approach be submitted. A facility’s submittal should address each section of the request form and explain in detail the proposed ACM, including a demonstration showing how the ACM will meet the intent and be equivalent to or exceed the established standard from which relief is sought. This may require submittal of both documentation and references to demonstrate that the intent is met and to support their claim of equivalence.

DEQ does not intend to develop or make available a list of potential ACMs; proposals must come from facilities. Therefore, it is the responsibility of the requesting facility to demonstrate the intent and equivalency of their proposal is consistent with currently established compliance method.

Completed forms should be sent to the appropriate DEQ Regional Office with a copy sent Meghann Quinn, VEEP Program, PO Box 1105, Richmond, VA 23218. For more information on completing this form, contact: Meghann Quinn at 804-698-4021 or meghann.quinn@deq.virginia.gov.



Details for **E2/E3/E4** Designation Ceremony for **Member Name**

- Date & Time:** Date & Time
- Location:** Address
- Facility Contact:** Contact & Phone Number
- DEQ Presenter:** Usually Regional Rep
- Ceremony Info:**
Ceremony notes.
- Facility Background:**
Description of facility.

Background Information:

The Virginia Environmental Excellence Program is DEQ's program to promote the use of environmental management systems (EMS) and pollution prevention as a means to achieve greater environmental quality and improved organizational performance. The program is based on the principles of ISO14001, the international standard for EMSs, which originated in Europe in the early 1990s. VEPP was started in 2000, and currently has more than 500 facilities that have been either accepted into the program or have applications pending.

The facility-based track of VEPP has three types of participation:

- E2 for those facilities who are interested in beginning or are in the early stages of implementing an EMS and pollution prevention program and have a record of sustained compliance with environmental regulations.
- E3 for those facilities with a fully-implemented EMS and a pollution prevention program with documented results and a record of sustained compliance with environmental regulations.
- E4 for those facilities with a fully-implemented EMS (that has been verified by an independent third party) that have committed to measures for continuous and sustainable environmental progress and community involvement.

Talking Points:

- VEEP is DEQ's voluntary recognition and incentive program. Facilities in the program have committed not only to be in compliance with environmental regulations but also to strive for continuous environmental improvement, which requires innovative thinking, leadership and partnerships.
- VEEP in and of itself is an example of a successful partnership. In the late 90s, DEQ worked with representatives of leading companies, citizen groups and government agencies from throughout the Commonwealth to develop the program. Part of DEQ's mission is to improve environmental results through a better engaged community. We want to help your facility be recognized by the local community and Virginia industry as an environmental leader. Your facility is now a resource for DEQ and an environmental asset to the local community.
- In addition, VEEP is now recognized nationally as a leading example of how a state can successfully provide incentives and recognition to high performing facilities to achieve real environmental progress.
- Today <<**VEEP member name**>> is being recognized for joining VEEP as an:
 - Environmental Enterprise or “**E2**” designation. “**E2**” facilities must have a good compliance history, and they must have implemented the framework of a working environmental management system or EMS. What that means is that this organization has created a structure that should result in meaningful improvements in their environmental performance.
 - Exemplary Environmental Enterprise or “**E3**” member. Becoming “**E3**” means that a facility has a good compliance history and has implemented a comprehensive environmental management system or EMS, which can typically take a year or more to put together.
 - Extraordinary Environmental Enterprise or “**E4**” member. Becoming “**E4**” means that a facility has a good compliance history, a fully implemented, comprehensive environmental management system verified by an independent third party auditor, and a documented commitment to continuous and sustainable environmental progress and community involvement – truly, no small feat to accomplish.
- I am also aware of some of your environmental achievements, and, in light of the occasion, I wanted to mention a few:
 - **Insert facility specific accomplishments.**

Thank you, and congratulations to all of you.

[Presentation of plaque & flag and photos.]

Driving directions:

From Regional Office and CO

Template for Press Release (E4)

ABC COMPANY ACHIEVES HIGHEST 'ENVIRONMENTAL EXCELLENCE' DESIGNATION

Cleanville, VA. □ ABC Company has received designation as an “Extraordinary Environmental Enterprise” by the Virginia Department of Environmental Quality’s (DEQ) Virginia Environmental Excellence Program. The recognition is awarded only to Virginia facilities that have a fully-implemented environmental management system with proven results and commitments to community involvement and long-term environmental performance.

The Virginia Environmental Excellence Program is the Virginia DEQ’s effort to promote the use of environmental management systems and pollution prevention to achieve superior environmental and improved organizational performance. Legislation passed during the 2005 Virginia General Assembly session established the program’s new Extraordinary Environmental Enterprise, or “E4” designation. As an E4 participant, facilities receive various benefits and may be eligible for alternative compliance methods, as a means to encourage innovation and enhance environmental protection.

“We are very pleased to receive this designation from the Commonwealth of Virginia,” said James Smith, Chief Executive Officer for ABC Company in Cleanville, Virginia. “Environmental quality is a core component of what we do, and our environmental management system has furthered our own efforts to ‘make the environment our business’.”

ABC Company has had a fully-implemented environmental management system in place for several years, helping it reduce the use of chemicals for wastewater treatment by ## tons, recycling ## tons of waste papers, reducing energy use by ## KwH and developing employee-aimed projects for travel and mass-transit commuting which reduce automobile emissions.

DEQ’s *Title and Name* presented designation plaques to ABC Company’s CEO *Name and Date* in a ceremony at the Cleanville facility. Also in attendance were (*DEQ staff*) and (*local dignitaries*).

For more information on ABC Company’s environmental management system, contact John Q. Public at (703) 367-4440. Information on the Virginia Environmental Excellence Program is available on the DEQ web site at www.deq.virginia.gov/Programs/PollutionPrevention/VirginiaEnvironmentalExcellenceProgram.aspx