

Appendix B: Template for Reporting Core ERP Descriptors

The tables below may be used as a template for states reporting on the core ERP descriptors, which provide critical context for understanding the results states report on the measures of performance of their ERP groups and their ERP policy approaches. The descriptors are organized into four categories: universe of facilities; policy approach; measurement approach; and miscellaneous. The States ERP Consortium recommends that all states strive to report on all of these descriptors. The Consortium expects that data for all of these descriptors should be generally available for most states implementing ERP. Please note the following:

- **Sensitive information:** The Consortium generally expects participating states to be open and transparent about their ERPs, and considers these core descriptors to be critical in communicating the context in which the ERP was implemented, an understanding of which is essential for interpretation of reported results. Nonetheless, the Consortium recognizes that some states may view certain, limited descriptor information as sensitive, for enforcement reasons or otherwise. In these cases, states may withhold that information, but are requested to identify the reason for withholding that information.
- **Data collection terminology:** The descriptors sometimes refer to "inspections" and "inspectors," as well as "site visits" and "data collectors," when describing the process of collecting data from randomly sampled facilities. These terms are used here interchangeably. The Consortium recognizes that states can effectively use different kinds of data collection approaches for their random samples, including regulatory inspections and site visits by non-regulatory personnel. States will identify their data collection approaches in the core descriptors template.
- **Suggestions on reporting:** Please be concise, but if the template does not allow enough space to provide the information requested, provide attachments as needed. To allow more room for entering information, states should delete the examples and notes columns in the template before submitting it. States should submit their own completed templates as attachments to an email to the following contacts for the States ERP Consortium's Information Sharing Workgroup:¹

Thomas Armstrong
thomas.armstrong75@cox.net

Suzi Peck
susan.peck@state.ma.us

¹ Contact information is current as of the publication date of this guide; states should check the Consortium website at: <http://erpstates.org/consortiumContacts.aspx> for up-to-date contact information.

Table 1: General Information about this Report

State Reporting			
Lead Agency Implementing ERP			
ERP Sector/Group			
Types of Data Included in this Report and Year Data Collected [Mark an "X" for all options that apply]	Baseline [Time period]	Self-Certification [Time period]	Post-Certification Inspection [Time period]
Date of This Report			
Status of Results (Draft or Final)			
Revision Number of this Document (first version of this document submitted should be indicated by #1; if there are subsequent revisions of the document submitted, they should be numbered sequentially)			
Individual Reporting Who Can be Contacted with Questions about Data Reported, including: Name, Organization, Phone Number, Email Address			

Table 2: Core Descriptors of the ERP

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
UNIVERSE (i.e., population of facilities eligible for ERP)			
<p>1. Universe definition (who's in, who's out?)</p> <p>What characteristics define the group of facilities that are eligible for and/or required to submit self-certification forms in your ERP?</p>		<p><i>A state with an auto body ERP might report: "The universe consists of all privately owned operations that paint passenger automobiles and trucks, exclusive of very large operations that would be required to have Title V air operating permits. Our universe does not include government-owned facilities or facilities that are dedicated to repairing freight trucks or other large vehicles (such as RVs)."</i></p>	<ul style="list-style-type: none"> • Provide sufficient detail for others to understand the group. As applicable, provide information about the type of business or other entity included; regulatory thresholds for emissions, waste, chemical usage, etc.; industrial processes; etc. • Avoid describing the sector using only state-specific jargon or thresholds. For example, simply indicating that all state-permitted facilities are in the group may be insufficient for those outside the state; instead, provide information about the characteristics that trigger permitting requirements. • Recognize that information about geographic targeting of your ERP, if any, is provided under a different descriptor line item.

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
<p>2. Geographic location of your universe</p> <p>Is your ERP statewide? [Yes/No]</p> <p>If no, please describe how it is targeted.</p> <p>If it has changed from prior years, please explain.</p>		<p><i>A state with an ERP universe encompassing the entire state would report: "statewide."</i></p> <p>A state with an ERP that is limited to a smaller geographic area would indicate that it does not have a statewide ERP and explain how it is targeted. For instance, it might report: "Our ERP is focused on four counties that are part of a nonattainment area (meaning they are not meeting federal air quality standards), and the ERP is intended to help mitigate contributing emissions in that area."</p>	
<p>3. Universe size</p> <p># of facilities in universe at the point in time at which the state has determined that the most recent certification period has closed.</p>		<p><i>A state might report the following final universe of facilities after its initial certification phase is completed: "800."</i></p> <p>It arrived at the final universe of 800 facilities as follows: The state began its ERP with an initial list of 1,000 facilities. The state placed phone calls and sent follow-up letters to all facilities that missed the certification deadline, and conducted what it deemed to be an appropriate level of verification with regard to facilities that submitted non-applicability forms and facilities whose mailings were returned as undeliverable. It added 20 newly identified facilities to its database, based upon unexpected certification submissions. The state also removed 80 facilities that did not meet the universe definition criteria and removed 140 facilities no longer in existence. The reported final universe of 800 facilities is calculated as follows: 1,000 original facilities plus 20 new facilities minus 220 closed or ineligible facilities.</p>	<ul style="list-style-type: none"> • The universe size should not include facilities removed because they were determined as not eligible for ERP or determined as closed. • The figure should include any facilities that were added to the known population of facilities because of new information obtained during the certification and inspection process. • The universe size indicates the total number of facilities you believe were eligible for ERP self-certification at the time that the most recent certification period closed, not just the number of facilities that submitted self-certifications. • If you are doing a pilot with a limited universe, consider reporting the estimated statewide universe size in addition to the universe size for the pilot project.

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
<p>4. Confidence in universe size</p> <p>How confident are you that your reported universe is representative of all facilities? [Indicate one option: very confident, moderately confident, or not very confident]</p> <p>Why?</p>		<p><i>A state with an ERP focused on retail gas stations might report: "Very confident: retail gas stations must register with our agency in order to receive fuel shipments from suppliers."</i></p> <p><i>Another state might report: "Moderately confident: the industry is growing rapidly and we are not sure we have most of new facilities that started up since we established our original list in 2006."</i></p>	
<p>5. Key environmental concerns</p> <p>In approximately one paragraph, explain the key processes or aspects of facilities in this group that may impact environmental, occupational, and/or public health outcomes.</p>		<p><i>A state with a dry cleaners ERP might report: "Dry cleaners use a variety of chemical and non-chemical means to clean clothes. Perchloroethylene (perc) is the most common chemical used in normal dry cleaning operations. Perc irritates the eyes and respiratory tract, and is suspected of causing cancer in humans. It is also a Hazardous Air Pollutant regulated under the federal Clean Air Act. Because of perc's effects on human health and its widespread use by dry cleaners, it is the primary environmental concern associated with the dry cleaning industry. Perc may be released to the air, wastewater and even soil during storage, transfer to dry cleaning machines, and machine operation. People may come in contact with perc from dry cleaning companies by (1) breathing vapors in and around dry cleaning facilities and from clothing taken home; (2) drinking water contaminated with perc; and (3) coming into contact with perc-contaminated soil."</i></p>	<ul style="list-style-type: none"> • If your understanding of the key environmental concerns has changed since implementing ERP, consider noting that as part of your reporting. • You may wish to identify whether this group is historically under- or unregulated, and whether there are new regulations impacting this group. • You may wish to link key environmental concerns to other factors influencing your agency's choice of this group for ERP, such as nonattainment of air or water quality standards in a geographic area that would be impacted by these facilities. For instance, a state in nonattainment of federal ozone standards might undertake an auto body shop ERP in order to try to reduce the emissions of volatile organic compounds (VOCs). VOCs emissions are an important environmental aspect of auto body shops, and are a contributing factor to ground-level ozone.

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
<p>6. Similarity to federal requirements</p> <p>Briefly explain whether the requirements addressed by your ERP are the same as or more stringent than federal environmental requirements that apply to the same universe of facilities.</p>		<p><i>A state with a dry cleaners ERP might report: "Our state's air regulations for this sector are more stringent than the federal MACT standard. Our hazardous waste requirements are the same as federal requirements, with the exception that our threshold for SQGs is lower -- i.e., SQGs are those facilities that generate 100-2200 pounds of hazardous waste monthly, rather than the federal standard of 220-2200 pounds. Wastewater requirements are handled by the local POTW in this pilot, but are generally more stringent than federal standards."</i></p>	<ul style="list-style-type: none"> It is not necessary to repeat information provided under the "Key environmental concerns" descriptor.
POLICY APPROACH			
<p>7. Substantive scope of ERP</p> <p>Briefly list the environmental media and any other policy issues (such as safety and health) that your ERP intends to address. Note if your ERP is not addressing one of the media with "key environmental concerns" described in the descriptor above, or is not addressing certain media in a comprehensive way.</p>		<p><i>The state with the dry cleaners ERP in the example for the descriptor above (Relationship to federal requirements) might report: "Air and hazardous waste. Our agency is not authorized to handle wastewater issues for the facilities in our ERP pilot, because those are handled by the local POTW. We alert the POTW if we notice any major concerns."</i></p>	<ul style="list-style-type: none"> In many cases this will be a very quick summary of information provided under "Key environmental concerns." E.g., "Air, industrial wastewater, UIC, hazardous waste." Identifying which media are included and whether certain media are not dealt with comprehensively will help with interpreting many of the core measures. In some cases, site visits may be able to address a broader scope than self-certification (e.g., if an agency only has authority to collect self-certification information with regard to one environmental medium). If so, explain this situation.
<p>8. ERP tools/ components used</p>	<p><u>Which tools are you using in your ERP? [Mark an "X" for all that apply]</u></p> <p>Statistical measurement Compliance assistance Self-certification by a responsible company official Compliance assurance and enforcement program</p>	<p><i>A state with a typical "full" ERP would indicate all options: statistical measurement, compliance assistance, self-certification, and compliance assurance and enforcement program.</i></p>	

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
<p>9. Certification type (i.e., voluntary or mandatory)</p> <p>Is submission of the certification form mandatory for all facilities, or voluntary?</p> <p>If certification type has changed or is expected to change in the future, explain.</p> <p>If certification is mandatory, but responses to some questions on the certification form are voluntary, explain.</p>		<p><i>Most states will simply need to answer: "mandatory" or "voluntary."</i></p> <p>If a state is transitioning from voluntary certification to mandatory certification, it might add a statement such as: "Due to the success of our pilot, we were able to convince the legislature to make certification mandatory when we rolled program out statewide."</p> <p>For some states, answering some questions on a mandatory certification form has been voluntary. For instance, a state might report that "Facilities must submit a certification form and answer all relevant questions on hazardous waste requirements. However, facilities are encouraged but not required to provide answers for questions related to other environmental media or related to voluntary best management practices."</p>	
<p>10. Certification motivators</p> <p>If certification is voluntary, identify motivators used to increase certification rate (both incentives for certifying and disincentives against not certifying).</p>		<p><i>For instance, a state might report: "We waived the permit fee for all certifiers and offered free technical assistance."</i></p> <p><i>Another state might report: "Our certification mailing informed all facilities that non-certifiers would be prioritized for regulatory inspections. We also offered a 90-day period during which certifiers could come into compliance without penalty."</i></p>	

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
<p>11. ERP's interface with regulatory structure</p> <p>Explain the extent to which your ERP integrates with or replaces key aspects of the regulatory structure in your state. For example:</p> <ul style="list-style-type: none"> • Does certification replace permits or a notification requirement? Does it help facilities meet a training requirement? • Do your inspections count toward inspection obligations your state has with regard to EPA-delegated programs? • Does your ERP address no regulatory issues at all? 		<p><i>A state might report:</i> "Our state plans to use ERP certification as a replacement for a one-time notification form to be required as part of the new EPA rule-making for this sector. Because certification replaces a one-time notification requirement, we are not currently certain whether we will have additional rounds of certification after the notification deadline. Also, our certification form addresses only compliance requirements, but our workbook and inspection checklists address voluntary practices.</p> <p>"Because of the linkage to the rule, we have been able to agree with the EPA Region that ERP inspections will partially count toward our inspection goals under our Performance Partnership Agreement."</p>	<ul style="list-style-type: none"> • Provide enough detail so that readers not familiar with regulatory issues for this universe can understand the issue. Background information provided elsewhere does not need to be repeated. • If your ERP involves no connection to regulatory requirements, please provide that information here. For instance, a state might explain that it asks facilities to voluntarily certify to optional best management practices, in an attempt to improve environmental performance in the absence of or prior to rulemaking.
<p>12. Permanence of ERP</p> <p>Is your ERP a pilot or a permanent program?</p> <p>If pilot, please describe your future plans.</p>		<p><i>A state with a geographically limited pilot would indicate that, and might report:</i> "If the results show ERP has promise for improving facility performance statewide, we intend to roll the ERP out statewide."</p>	

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
<p>13. External stakeholder involvement approach</p> <p>Please describe the external stakeholders that have been involved in developing and/or implementing the ERP approach, and identify the activities they've been involved in.</p>		<p><i>A state might report: "We held three external stakeholder meetings prior to the first certification. The meetings were attended by representatives of the two key trade associations in the state (with about 50% of the state's universe as members), along with owners/operators from three "good actor" shops. These industry representatives provided feedback on the workbook and checklist, and the incentives. A community environmental group from the pilot area was invited and has been kept informed, but did not attend any meetings."</i></p>	<p>Note if any key stakeholders have been conspicuously absent, despite efforts to engage them.</p>
MEASUREMENT APPROACH			
<p>14. List of EBPIs</p> <p>Provide list of EBPIs, identifying voluntary versus compliance-related EBPIs and identifying the corresponding media category [Indicate all that apply: air, water, solid waste, hazardous waste, USTs, health, safety, other].</p> <p>Also please note any changes to EBPIs from prior years.</p>		<p><i>Massachusetts might provide the following information for its photo processors ERP, which had 8 EBPIs:</i></p> <ol style="list-style-type: none"> 1. Is there no discharge to the septic system? (Compliance-related, Water) 2. Are all containers in good condition? (Compliance-related, Hazardous Waste) 3. Are container on floors in good condition and on a crack free surface? (Compliance-related, Hazardous Waste) 4. Are containers closed except when wastes are added? (Compliance-related, Hazardous Waste) 5. Are containers labeled "hazardous waste?" (Compliance-related, Hazardous Waste) 6. Is the facility meeting the 2 ppm silver discharge limit? (Compliance-related, Water) 7. Is the facility sampling? (Compliance-related, Water) 8. If yes, is the facility sampling the correct frequency? (Compliance-related, Water) 	<ul style="list-style-type: none"> • Submit a description that is sufficiently detailed so that others can understand the issue; typically this would be more than just a couple of words. • Note changes in EBPIs over time. You should establish a new baseline for new EBPIs and use existing baselines for EBPIs that remain the same. Note that changes to EBPIs will limit the comparability of EBPI-based measures (such as the aggregate achievement rate for all EBPIs) over time. Such changes may also inhibit your ability to use automated tools for some analysis and reporting tasks. • As their name suggests, Environmental Business Practice Indicators (EBPIs) are generally understood to be measures of facility performance with regard to certain practices. Please discuss measures or estimates of environmental/health outcomes (such as changes in emissions or water quality impacts) in the "Environmental/Health Outcomes" section of the core measures. • Typically, EBPIs indicate whether or not each individual facility is achieving a particular beneficial practice or set of practices (in other

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
			<p>words, each EBPI has a yes or no response). The core measures presented in Appendix C assume this is the case. However, at least one state has developed EBPIs that represent a continuum of achievement: e.g., indicating the percentage of beneficial painting practices being undertaken by each auto body shop, which is not a "yes or no" answer. This latter approach can be valuable, but can be inconsistent with at least some of the EBPI-based core measures (such as aggregate achievement rates and average facility scores for EBPIs), which assume that all EBPIs have "yes or no" answers. If any of your state's EBPIs are not "yes or no" questions, you may not be able to report on all the core measures. Consider treating such continuous measures as "Other Key Measures" under the core measures, rather than as EBPIs.</p> <ul style="list-style-type: none"> • Sometimes, EBPIs represent compliance issues for certain facilities but voluntary best practices for other facilities. In such cases, clarify whether your state's results for that EBPI reflect only compliance-related responses, or all responses. In the latter case, this measure would be a broad measure of performance that indicates the extent to which facilities are achieving a certain desirable practice, whether or not that practice is required of them.

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
<p>15. EBPI selection approach</p> <p>Were your EBPIs selected because you feel they are the most important issues in the sector? [Yes/No]</p> <p>If no, please explain your process of selecting EBPIs.</p>		<p><i>Almost all ERP states to date would report: "Yes."</i></p> <p><i>A state with an alternative approach to EBPI selection might report: "No. Our state treats as an EBPI any performance measure for which we've collected sufficient data to make inferences about sector performance. We feel that every performance measure we use is important, especially ones related to compliance."</i></p>	
<p>16. Random sample approach</p> <p>Did you take a simple random sample of the entire universe of facilities for all rounds of random inspections being reported? [Yes/No]</p> <p>If no, or if there are any other unusual issues associated with your random samples or with your analysis of them, please explain.</p>		<p><i>Most ERP states would report: "Yes."</i></p> <p>Doing so indicates the state drew its random sample from a randomized list of all the facilities in the universe. Therefore, no other information would necessarily need to be reported unless problems were encountered in implementation, such as being refused entry at randomly sampled facilities.</p> <p><i>A state using a different approach might report: "No. We conducted a stratified sample for the post-certification random inspections, inspecting 25 certifiers and 25 non-certifiers, to ensure we could draw inferences about both the subgroups of volunteer certifiers and the non-certifiers. Also, our inspectors were denied entry at three of the non-certifiers we attempted to visit. Three replacement facilities from the random list were visited instead."</i></p>	<ul style="list-style-type: none"> • Explain any stratification or other unusual sample design pursued. • Explain any important deviations from the sample design that occurred in executing the sample (e.g., being denied entry at randomly sampled facilities).
<p>17. Random sample size</p> <p>What was the total sample size for each round of random inspections?</p>		<p><i>A state might report: "Baseline, 50. No other rounds of random inspections yet completed." In this example, the state had planned on a sample size of 55 facilities, but only conducted 50 valid site visits, so it reports 50 as the total sample size.</i></p>	<p>Be sure to provide the actual number of valid site visits accomplished, even if it is different than the planned sample size.</p>

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
<p>18. Data collector skills/training</p> <p>Describe skill level and training of the individuals who collected data during the random facility visits.</p>		<p><i>One state might report:</i> "Our data were collected by experienced hazardous-waste inspectors, who were provided cross-training in the other media covered by this ERP, and who also received training on proper data collection techniques. Checklists were field-tested to help ensure a common understanding."</p> <p><i>Another state might report:</i> "Our data were collected by pollution prevention auditors with experience at these kinds of facilities. We trained all of them in how to use the new electronic checklists and follow the random sampling protocol."</p>	
<p>19. Data entry approach</p> <p>If using web-based certification and another option, please provide the percentage of certifications that were submitted online.</p>	<p><u>Form of data submission/data entry for inspection data:</u> (Mark an "X" for all that apply)</p> <p>Electronic field collection Scanning of paper forms Manual data entry of paper forms Other (specify)_____</p> <p><u>Form of data submission/data entry for certification data?</u> (Mark an "X" for all that apply)</p> <p>Web-based Scanning of paper forms Manual data entry of paper forms Other (specify)_____</p>	<p><i>A state might indicate the following practices:</i></p> <ul style="list-style-type: none"> • "electronic field collection for inspection data" • "web-based certification submissions" • "manual data entry of paper forms" • "80% of certifications submitted online" <p><i>It would report this because:</i> (1) It has its inspectors entering data in the field through handheld PCs.(2) It encourages facilities to submit certifications through an online system, but also accepts paper versions that are manually data-entered. (3) 800 out of 1000 certifications were submitted online, so the state reported 80% for the rate of web-based certification.</p>	

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
MISCELLANEOUS DESCRIPTORS			
<p>20. Timeframe of key ERP activities</p> <ul style="list-style-type: none"> • Year for each round of random inspections to date in your ERP • Year of each round of certification to date • Are there any timing issues that have come up in your ERP that would impact how your data should be interpreted? 		<p><i>For instance, a state that has completed only one cycle of ERP might report:</i></p> <ul style="list-style-type: none"> • "2004, baseline inspections; • "2005, round 1 facility certification; and • "2005, post-round 1 random inspections." • "No unusual timing issues have occurred with our data collection." 	<ul style="list-style-type: none"> • A “cycle” of ERP includes random inspections, followed by self-certification, and then random inspections. If an ERP continues over time, each new self-certification period initiates a new “round” of ERP. Therefore, major milestones in an ERP over time would include “Baseline Random Inspections,” “Round 1 Facility Certification,” “Post-Round 1 Random Inspections,” “Round 2 Facility Certification,” “Post-Round 2 Random Inspections,” etc. For an illustration of these terms, refer to Figure 1 in the introduction to Appendix C. • Be sure to indicate if baseline inspections did not occur prior to Round 1 of certification • Indicate if rounds of random inspections overlap with rounds of certification (e.g., post-round 1 random inspections beginning before round 1 certification deadline).

Descriptor Name and Description	Info Reported by State	Example <i>[Delete this column before submitting template]</i>	Notes <i>[Delete this column before submitting template]</i>
<p>21. External factors influencing ERP</p> <p>Are there any factors outside the ERP that may affect the universe of facilities and/or impact how data should be interpreted, how the ERP was implemented, or the potential environmental impact of ERP?</p>		<p><i>A state with a gas station ERP might report:</i> "After we conducted our baseline random sample, but before random post-certification inspections, we inspected over 60% of all the facilities in the universe, in order to meet federal requirements under the 2005 Energy Policy Act. We believe this large number of inspections complemented the standard ERP approach in terms of improving facility performance."</p> <p><i>A state with a photo processor ERP might report:</i> "Since we began ERP, digital photography has taken off and the cost of silver has risen substantially. We believe that both of these factors are leading to a natural decrease in the use and discharges of silver among photo processors. This complicates any inferences about the impact of ERP on photo processing sector performance."</p>	<ul style="list-style-type: none"> • These external factors would include any important regulatory, policy, economic, or technological changes that have affected ERP facilities during ERP implementation. • These factors would also include other initiatives affecting the sector conducted by federal, state, or local governments.
<p>22. Changes to ERP since the last ERP cycle</p> <p>If not discussed already, briefly describe any important changes in your ERP since the last ERP cycle. For instance, describe important changes to regulatory requirements, certification type, universe, EBPIs, etc.</p>		<p><i>A state might report:</i> "After our initial voluntary-certification pilot, we expanded ERP to include all dry cleaners in the state and made certification mandatory."</p>	<ul style="list-style-type: none"> • If this is your first time reporting on ERP, or if all important changes to the ERP are described elsewhere in the core descriptors, mark "not applicable." • A "cycle" of ERP includes random inspections, followed by self-certification, and then random inspections. For an illustration of the steps included in an ERP cycle, refer to Figure 1 in the introduction to Appendix C.