



Virginia Environmental Excellence Program Operations Manual

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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 | Mark Miller |
| Piedmont | Kyle Winter |
| Southwest | Jeff Hurst |
| Tidewater | Russell Deppe |
| Valley | Tamara Amblers |

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 & Acceptance

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.
2. OPP Manager assigns Lead Reviewer.
3. OPP Manager updates the DEQ website and CEDS.

4. The Lead Reviewer evaluates the application for completion to ensure that all major elements required have been included with the application.
5. Lead Reviewer contacts the facility POC to acknowledge receipt of application within 2 weeks.
6. Lead Reviewer prepares and submits compliance review request. See Section 3.3.3 for additional information on the compliance review procedure.
7. 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.
8. 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.
9. 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).
10. 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.
11. Lead Reviewer drafts facility acceptance letter.
12. Application goes to 2nd Reviewer.
13. 2nd Reviewer conducts application review. If appropriate, 2nd Reviewer identifies application issues.
14. 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.
15. 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, the Federal, facilities Restoration Program , local municipal government and other agencies, 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 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. |

| | | | |
|-----|---|---|--|
| | | RO and CO contacts can recommend an application be held while compliance issues are addressed. | |
| | <p>RO contacts are listed in Section 2.4.</p> <p>CO contacts:</p> <p><i>Division of Enforcement</i> Water Enforcement Manager: Wetlands Enforcement Manager: Lee Crowell Land Enforcement Manager: Kristen Sadtler Enforcement Director: Jefferson Reynolds 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 (Groundwater permits only) include Previn Smith and Patti Higgins</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> | LT makes a final determination on E4 eligibility. | LT request is made after 2 nd review of application. No established timeframe on LT review. |
| OPP | 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. | 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 the date of | Within two weeks of receiving final compliance feedback. |

| | | | |
|--|--|--|--|
| | | 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, and those 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 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 www.veeponline.org 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 www.veeponline.org updated and available for reporting is February 1. At this time the site should be available to accept reports for the previous calendar year. In order to meet this goal it is suggested that VEEP Staff contact the Office of Information Services (OIS) (Darryl Addison) with edits to the site by December 1. These edits might include adding or deleting reporting facilities, adding or deleting reporting questions and, if necessary, updating VEEP staff contact information. VEEP staff also needs to review documents supporting www.veeponline.org like the [VEEP Reporting](#) web page and related reporting instructions and tutorials.

When OIS has updated www.veeponline.org and enabled reporting for the new reporting cycle the website is reviewed on a test site by VEEP staff to make sure that the site is fully functional. Any identified issues must be resolved with OIS.

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.

VEEP applications and supporting materials for applications approved before June 15, 2016 are currently archived on a shared Agency drive called the U:drive. Old records will be purged per VEEP's ECM retention schedule, see Appendix B. This includes hard copies and records stored on the U: drive. Applications approved prior to June 15, 2016 or currently under review will be stored on the U:drive until these files are no longer relevant because they have exceeded the retention schedule or until all current/active application documents are 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.

For more detail on VEEP's integration into ECM please see the 'Request for Approval to Proceed with ECM Implementation for the Virginia Environmental Excellence Program (VEEP),' Appendix B.

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 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

Appendix B: Link to ECM Guidance & Approval

- Request for Approval to Proceed with ECM Implementation for the Virginia Environmental Excellence Program (VEEP)

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. VEEP 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 VEEP 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



VEEP Sustainability Partners Program - Application Review Form

Part One: General Information

The following information is complete:

- Organization name and type **Yes**___ **No**___
- Address/ Mailing **Yes**___ **No**___
- Contact **Yes**___ **No**___
- Organization information/description **Yes**___ **No**___
- Number of Virginia facilities **Yes**___ **No**___
- Number of employees **Yes**___ **No**___

The facilities applying for and not applying for the program is clear? Yes/ No

Comment:

Part Two: Documenting a Culture of Sustainability

Policy, Awards and Other sections support a culture of environmental sustainability? **Yes**___
No___

Comment:

Part Three: Recent Accomplishments

A minimum of two specific examples of ongoing activities, including one external, of collaborative partnerships and community/stakeholder involvement has been shown. **Yes**___
No___

Comment:

The organization lists current goals for reducing environmental impacts and advancing sustainability. **Yes**___ **No**___

The projects listed under 'Environmental Footprint Reporting' support at least one of the Part Three B sustainability goals. **Yes**___ **No**___

At least one of the projects listed includes measurable (numerical) reporting data. **Yes**___
No___

Part Four: Future Commitments

The organization has listed a minimum of two, possible future, environmental sustainability projects (quantified to the extent possible). **Yes**___ **No**___

Comment:

Review Summary

The applicant was contacted for updates to the application? **Date:**_____

The facility has met the requirements of the VEEP Sustainability Program? **Date:**_____

The facility has passed the compliance check? **Date:**_____

The facility has not met the requirements of the VEEP Sustainability Program?

Reason:



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

Fax: 804-698-4019 - TDD (804) 698-4021

www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4020
1-800-592-5482

Month Day, 20XX

Name
Title
Facility
Address Line 1
Address Line 2

Dear Mr. or Ms. Name:

Congratulations! The <<Facility Names>> has been approved as a Virginia Environmental Excellence Program Sustainability Partner (VEEP SP) for calendar year 20XX. This approval is in recognition of the numerous significant environmental achievements the <<facility type>> has made to date, <<your previous participation as a Sustainability Partner,>> and the ambitious sustainability goals you have set for the future. Employees throughout your organization should be proud of this accomplishment. 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.

If you are interested in planning an event of some type, please contact me at (804) 698-4021 or Meghann.Quinn@deq.virginia.gov.

Sincerely,

Meghann Quinn, Manager
Office of Pollution Prevention

Enclosure

cc: Regional Directors Name, DEQ <<Region>> Regional Office Director

MEMORANDUM
Department of Environmental Quality
Division of Environmental Enhancement
Office of Pollution Prevention

SUBJECT: Request for Approval to Proceed with ECM Implementation for the Virginia Environmental Excellence Program (VEEP)

TO: Keith Showman, Co-Chair, ECM Steering Committee
Todd Alonzo, Co-Chair, ECM Steering Committee

FROM: Meghann Quinn, Office of Pollution Prevention Manager

DATE: March 3, 2016

COPIES: Sharon Baxter, Director Division of Environmental Enhancement

Keith Boisvert, Office of Pollution Prevention, Environmental Specialist II

Morgan Goodman, Office of Pollution Prevention, Environmental Specialist II

The Office of Pollution Prevention (OPP) has determined that the Virginia Environmental Excellence Program (VEEP) Environmental Management System (EMS) track and Sustainability Partners (SP) track files are ready to be entered into FileNet as the official repository for documents of record. This memorandum and attachments document the Virginia Environmental Excellence Program's fulfillment of the requirements for using FileNet as the official repository for the files of record as prescribed in the FileNet Implementation Plan dated March 12, 2009. The Office of Pollution Prevention hereby requests approval of the ECM Steering Committee to proceed with ECM implementation for VEEP documents.

- **Project Scope:** The documents covered in this project are all records related to VEEP applications and reviews included under the specific Retention Schedule Number GS-10 VEEP EMS track Series Number 200498 and VEEP SP track Series Number 200499.
- **Retention Schedule:** The retention schedule and file series have been approved by the Library of Virginia and will be included in FileNet. The Retention Schedule Number GS-101: Virginia Environmental Excellence Program (VEEP) EMS track and VEEP SP track. Record Series Numbers 200498 and 200499, respectively. See attachment 5 for a copy of the retention schedule.
- **User Group:** A user group has been established that is comprised of the two VEEP application reviewers, Keith Boisvert and Morgan Goodman, OPP Manager, Meghann Quinn and Division Director Sharon Baxter. A list of the User Group members is included in Attachment 1. Keith Boisvert will serve as the VEEP representative to the ECM Steering Committee.

- Active Files: Active files for this request have been established as all VEEP applications and accompanying documents approved on or after by June 15, 2016.
- Document Types: There are two file series for VEEP records. Several document types will be established in these series. Documents types and their definitions are listed in Attachment 2.
- Metadata Requirements: Metadata requirements are included in Attachment 3.
- Security Roles: A table with the security roles of all appropriate OPP central office staff is included as Attachment 4. An ECM access request form will be submitted to OIS Security with the list in the attachment.
- Scanning Process: see process in Attachment 6 for scanning VEEP documentation.

Document QA/QC: Documents placed into FileNet will adhere to the Agency's approved *QC/QA Manual for Electronic Documents*, June 30, 2009, before the destruction of the paper records and declaring the electronic record the file of record. Keith Boisvert will coordinate document recycling with Jay Gutshall on a semi-annual basis.

- Administration: At least one representative from the VEEP User Group will participate in the Content Acquisition Expert Panel if requested.

Approved: _____ Date: _____

Co-Chair ECM Steering Committee

Approved: _____ Date: _____

Co-Chair ECM Steering Committee

VEEP User Group
Attachment 1

| Name | Region | Role |
|------------------|--------|---------------------------|
| Baxter, Sharon | CO | Director DEE |
| Quinn, Meghann | CO | OPP Manager |
| Boisvert, Keith | CO | VEEP Application Reviewer |
| Goodman, Morgan. | CO | VEEP Application Reviewer |

Attachment 2

GS-101— VEEP EMS Track Document Types

All VEEP EMS Track documents fall under the following file series:

Record Series: VEEP EMS and VEEP SP tracks

Record Number: 200498 and 200499, respectively

Retention Schedules: Four years from date of approval for 200498 VEEP EMS track and two years from date of approval for 200499 VEEP Sustainability Partners

Document types are listed below:

| Document Type | Document Description |
|------------------------------------|--|
| Correspondence | <input type="checkbox"/> General correspondence related to the application process <input type="checkbox"/> Requests for more information from reviewers <input type="checkbox"/> Acceptance or rejections letters |
| VEEP Application | <input type="checkbox"/> Application denoting level of program applied to for EMS track t or the SP track application |
| VEEP Application Support Documents | <input type="checkbox"/> Environmental Management System (EMS) Manual <input type="checkbox"/> Other EMS or application related documents that clarify, support and demonstrate the merit of the application including a pollution prevention plan or other attachments |
| Compliance Review | <input type="checkbox"/> A compliance review form (s) and for EMS track applications documentation that a facility or facilities meets regulatory compliance, and, are, therefore, eligible for the program |
| VEEP Review | <input type="checkbox"/> The VEEP review form documents and application reviewers findings and comments when reviewing an application and is used when justifying an application acceptance to or rejection from VEEP EMS track or SP track |

Attachment 3

VEEP EMS Track Review Metadata Requirements

Office — Mandatory field

Central Office

Division/Media — Mandatory field

SelectAdmin

Program — Mandatory field

Select VEEP ('VEEP' needs to be added as an option to the Program drop-down list)

Document Date — Mandatory field

Date approval letter is sent

File Name — Mandatory field

When using the Add Document function, the *File Name* defaults to the file's path and name, e.g. \\folder\folder\filename_abc.pdf. For scanned documents, the *File Name* is assigned by the system.

Document Title — Mandatory field

The *Document Title* will default to the *File Name* unless changed. Use the title on the document.

Document Is — Mandatory field

The system will default to *Electronic* for all electronic records uploaded to FileNet. Select *Paper* only if a placeholder document is added and the file of record is not in FileNet but retained as a paper file.

Retention Schedule — Mandatory field

All VEEP EMS track and VEEP SP track records are stored under the *Retention Schedule* GS-101: Administrative Records

File Series — Mandatory field

VEEP EMS track has a single *File Series* and VEEP SP has a single *File Series*. Select the *File Series* 200498 or 200499 from the menu or type in the number.* (* Files series 200498 and 200499 need to be added as an option in ECM)

Document Type — Mandatory field

Select the appropriate *Document Type* from the menu.* (*VEEP EMS track and VEEP SP track document types need to be added into ECM. They currently do not exist)

Case ID — Mandatory field for all *VEEP EMS track* and *VEEP SP track* documents.

- The VEEP application number will be used as the Case ID. The Case ID will be validated against the VEEP CEDS module.

Attachment 3 cont.

File Number — Optional field

- Leave blank

Restriction Reason — Mandatory field

- The default *Restriction Reason* is *None*, allowing the document to be accessed by everyone. Select the appropriate *Restriction Reason* to restrict access.

Action Type — Optional field

- No entry

Received Date — Optional Field

- The date the document was stamped at the Agency or the date the e-document was received

Key Words — Optional field

- Key Words* is a program defined field. *Key Words* may be used to facilitate retrieving some records.

Paperclip — Optional field

- No entry

Closed Date — Optional field

- No entry

Audit Date — Optional field

- No entry

Added By — Optional field

- No Entry

Agency Contact — Optional field

- The application reviewer responsible for application

Responsible Person/Party — Optional field

- No entry

Document Owner — Optional field

- No entry

Contributor — Optional field

No entry

Attachment 4

Security Roles

Key:

1. Read Only
2. View and add digital documents
3. View, add and edit all Metadata for VEEP — EMS and SP Track
4. View, add, edit and delete documents for VEEP — EMS and SP Track

Region: Central Office

| Name | Role | New Account | Existing Account | Security Role |
|-----------------|----------------------|--------------------|-------------------------|----------------------|
| Baxter, Sharon | Director DEE | | x | 1 |
| Quinn, Meghann | OPP Manager | x | | 4 |
| Boisvert, Keith | Application Reviewer | x | | 3 |
| Goodman, Morgan | Application Reviewer | x | | 3 |

Attachment 5
Retention Schedules

LIBRARY OF VIRGINIA
Archives, Records, and Collections Services
800 E. Broad St., Richmond VA 23219 (804)
692-3600

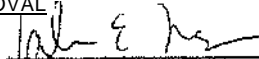
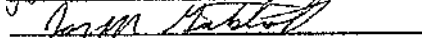
RECORDS RETENTION AND DISPOSITION SCHEDULE
SPECIFIC SCHEDULE NO. 440-008

Environmental Quality, Dept. of
Environmental Enhancements, Division of

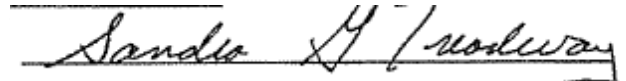
The schedule on the attached page(s) is approved with agreement to follow the records retention and disposition policies listed below:

AGENCY APPROVAL

AGENCY HEAD OR DEPUTY
AGENCY RECORDS OFFICER

STATE APPROVAL



COMPTROLLER OR DEPUTY

EFFECTIVE SCHEDULE DATE: DEC 21 2015

POLICIES FOR RECORDS RETENTION AND DISPOSITION

1. This schedule is continuing authority under the provisions of the Virginia Public Records Act, § 42.1-76, et seq. of the Code of Virginia for the retention and disposition of the records as stated on the attached page(s).
2. This schedule supersedes previously approved applicable schedules.
3. This schedule is used in conjunction with the Certificate of Records Destruction (RM-3 Form). A signed RM-3 Form must be approved by the designated records officer and on file in the agency or locality before records can be destroyed. After the records are destroyed, the original signed RM-3 Form must be sent to Library of Virginia (LVA).
4. Any records created prior to 1913 must be offered, in writing, to LVA before applying these disposition instructions. Offered records can be destroyed 60 days after date of the offer if no response is received from LVA. A copy of the offer must be attached to the RM-3 Form when it is submitted to LVA.
5. All known audits and audit discrepancies regarding the listed records must be settled before the records can be destroyed.
6. All known investigations or court cases involving the listed records must be resolved before the records can be destroyed. Knowledge of subpoenas, investigations, or litigation that reasonably may involve the listed records suspends any disposal or reformatting processes until all issues are resolved.

1. The retentions and dispositions listed on the attached page(s) apply regardless of physical format, i.e., paper, microfilm, electronic storage, optical imaging, etc. Unless prohibited by law, records may be reformatted at agency or locality discretion. Microfilming must be done in accordance with 17VAC15-20-10, et seq. of the Virginia Administrative Code, "Standards for the Microfilming of Public Records for Archival Retention." All records must be accessible throughout their retention period in analog or digital format. Whether the required preservation is through prolongation of appropriate hardware and/or software, reformatting, or migration, it is the obligation of the agency or locality to do so.
2. Custodians of records must ensure that information in confidential or privacy-protected records is protected from unauthorized disclosure through the ultimate destruction of the information. Ultimate destruction is accomplished through shredding, pulping, burning, and overwriting or physically destroying media. Deletion of confidential or privacy-protected information in computer files or other electronic storage media is not acceptable. Records containing Social Security numbers must be destroyed in compliance with 17VAC15-120-30.
3. Under the Virginia Public Records Act, § 42.1-79, LVA is the official custodian and trustee of all state agency records transferred to the Archives, Library of Virginia. LVA may purge select records in accordance with professional archival practices in order to ensure efficient access.
0. Unless otherwise directed, files are closed out at the end of each calendar or fiscal year as appropriate. Retention periods start at that time.

LIBRARY OF VIRGINIA
 Archives, Records, and Collections Services
 800 E. Broad St., Richmond VA 23219
 (804) 692-3600

RECORDS RETENTION AND DISPOSITION SCHEDULE
 SPECIFIC SCHEDULE NO. 440-008
 Environmental Quality, Dept. of
 Environmental Enhancements, Division of

EFFECTIVE SCHEDULE DATE: 12/21/2015

| RECORD SERIES AND DESCRIPTION | SERIES NUMBER | SCHEDULED RETENTION PERIOD | DISPOSITION METHOD |
|---|---------------|---|------------------------------|
| <u>Competitive Educational Grant Applications: Non Qualifying</u> This series documents applications not selected for funding. Includes request for grant, grant guidelines, grant application, correspondence, description of organization, budget, and marketing materials. | 006137 | 0 Years after decision | Non-confidential Destruction |
| <u>Competitive Educational Grant Applications: Qualifying</u> This series documents grants awarded by DEQ for litter prevention and/or recycling educational projects. This series may include, but is not limited to: request for grant, grant guidelines, grant application, description of organization, budget, correspondence, and marketing materials. | 006136 | 3 Years after end of state fiscal year | Non-confidential Destruction |
| <u>Competitive Educational Grant Applications: Summary Data</u> This series documents the summary of the competitive educational grants awarded each year. This series may include, but is not limited to: project description and final report. | 006138 | 0 Years after no longer administratively useful | Non-confidential Destruction |
| <u>Virginia Environmental Excellence Program (VEEP): Environmental Management System (EMS) Track</u> This series documents applications to the Virginia Environmental Excellence Program (VEEP) Environmental Management System (EMS) Track. This series may include, but is not limited to: applications, correspondence, EMS manuals, and review forms. | 200498 | 4 Years after approval | Non-confidential Destruction |
| <u>Virginia Environmental Excellence Program: Sustainability Partners (VEEP SP)</u> This series documents applications to the Virginia Environmental Excellence Program (VEEP) Sustainability Partners (SP). This series may include, but is not limited to: applications, correspondence, review forms. | 200499 | 2 Years after approval | Non-confidential Destruction |

Attachment 6

Scanning Process VEEP Electronic Files

1. VEEP (EMS or SP) application received
2. Application is dated and reviewer assigned
3. Reviewer determines completeness of application and eligibility for acceptance into VEEP
4. Necessary correspondence and site visit, if required are conducted
5. Determination on acceptance into program is made
6. Acceptance letter or rejection is sent to applicant
7. Reviewer scans hard copy documents
8. Reviewer prepares electronic documents for upload into ECM under the associated Case ID
9. An alternate reviewer or the OPP Manager will QAQC electronic documents as they are entered into ECM

Post — QAQC Process and Document Destruction

1. QAQC of scanned document is completed
2. Document destruction form is filled out and sent to Jay Gutshall
3. Upon approval from Jay Gutshall hard copy documents may be recycled