

COMMONWEALTH OF VIRGINIA

Department of Environmental Quality

Subject: Virginia Environmental Excellence Program Operations Manual

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Summary:

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

Electronic Copy:

Once effective, an electronic copy of this guidance will be available on:

- The Virginia Regulatory Town Hall under the Department of Environmental Quality (<http://www.townhall.virginia.gov/L/gdocs.cfm?agencynumber=440>);
- The Department's website at <https://www.deq.virginia.gov/get-involved/pollution-prevention/virginia-environmental-excellence-program>.

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Certification:

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

Disclaimer:

This document is provided as guidance and, as such, sets forth standard operating procedures for the agency. However, it does not mandate or prohibit any particular action not otherwise required or prohibited by law or regulation. If alternative proposals are made, such proposals will be

reviewed and accepted or denied based on their technical adequacy and compliance with appropriate laws and regulations.

Initials: Shaw Baxd



Virginia Department of Environmental Quality Office of Pollution Prevention

Virginia Environmental Excellence Program Operations Manual



Revised December 2020

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1.0 Introduction to the Operations Manual

This manual summarizes the framework, workflow, goals and implementation of the Virginia Environmental Excellence Program (VEEP). It addresses the current aspects of VEEP implementation. 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). Previously only facilities were eligible for the EMS track of VEEP. Because of VEEP, Virginia is 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 surpass the result seen from meeting minimum compliance regulations. VEEP is designed to act as a platform for promoting environmental innovation and a unique collaborative relationship aimed at maximizing the potential of environmental performance. It is not meant to replace the regulatory and enforcement approach to environmental protection. VEEP builds off a base of regulatory compliance. Specifically, VEEP has set out to build relationships between members and the DEQ that seek to:

- Enhance trust and accountability;
- Foster environmental innovation and improved performance;
- Facilitate a more efficient allocation of DEQ's compliance and enforcement resources; and
- Promote 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 designed to support the mission and define program success.

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 SP tracks, or both.

VEEP EMS track levels are:

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

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 (limited to Virginia facilities).

For more information on the distinction between levels, see the framework as laid out on the [VEEP website](#).

2.3 VEEP Staff

VEEP is managed by 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 strongly support 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.

DEQ Regional Offices
Blue Ridge
Northern
Piedmont
Southwest
Tidewater
Valley

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 work with the DEQ enforcement staff when it is decided that including the implementation of an EMS into a supplementary environmental project (SEP) is appropriate. 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 those interested in becoming environmental leaders. 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 regional representative 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 are likely to be interested in and qualified for the program.

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 pollution prevention section of DEQ's 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 and identifying resources to advance an EMS.

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

3.3.1 Application Submission

Once an application is submitted, a Lead Reviewer is assigned to see the application through the process. The Lead Reviewer will contact the facility notifying them that the application review process has begun within 2 weeks of receiving the application. For the purposes of notifying the public, DEQ will post the names of the E2, E3 and E4 facilities that are under review on its website. Applicants 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 being sought.

EMS Track Application Process

1. Applicant submits new or renewal application to OPP Manager or VEEP@DEQ.Virginia.gov.
2. OPP Manager assigns Lead Reviewer in DEQ's Comprehensive Environmental Data System (CEDS) and the DEQ website is updated

- quarterly with renewal applications and as necessary when new applications are received.
3. The Lead Reviewer evaluates the application to ensure that all major elements required have been included with the application.
 4. Lead Reviewer contacts the facility POC to acknowledge receipt of application within 2 weeks.
 5. Lead Reviewer prepares and submits compliance review request. See Section 3.3.3 for additional information on the compliance review procedure.
 6. Lead Reviewer conducts application review using the VEEP Application Review Form found in CEDS. If appropriate, follow up with applicant on questions and issues.
 - a. The application is held until all issues are resolved or the application is rejected.
 7. If compliance review is not approved the application is held until compliance is resolved or the application is rejected. During this time the application will be considered to be on a 'compliance hold'.
 8. If compliance review is approved and application review is approved:
 - a. E2 New & Renewal: Submit to 2nd Reviewer (Skip to step 10).
 - b. E3 & E4 New: Lead Reviewer schedules a site visit (Continue to step 9).
 - c. E3 & E4 Renewal: Submit to 2nd Reviewer (Skip to step 10).
 9. Lead Reviewer schedules a site visit with facility POC.
 - a. Two VEEP staff members attend site visit with facility
 - b. VEEP site visit protocol is completed. For more information on the site visit, see Section 3.3.4.
 10. Lead Reviewer drafts facility acceptance letter.
 11. Application goes to 2nd Reviewer.
 12. 2nd Reviewer conducts application review. If appropriate, 2nd Reviewer identifies application issues and follows up on issues if necessary.
 13. Once 2nd review is approved:
 - a. E2 and E3 acceptance/renewal letter signed by OPP Manager and sent to applicant by Lead Reviewer.
 - b. E4 renewals with no compliance issues identified during the review can be approved, letter sent to the Division of Environmental Enhancement Director for signature and signed letter sent to applicant by Lead Reviewer.
 - c. New E4 applications and E4 renewals with compliance issues (that pass the compliance check) go to the OPP Manager to coordinate LT review, see Section 3.3.3.
 14. If the LT review group approves the new or renewal application, the E4 acceptance or renewal letter is signed by the Division of Environmental Enhancement Director and sent to the applicant by the Lead Reviewer.
 - a. If LT does not approve the E4 application, it is held until compliance is resolved or application is rejected.

Applicants 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.

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

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

Office	Action	Results	Estimated Timeframe
OPP	Conduct record review for the applicant. Ensure all CEDS Core facilities associated with the application are linked to the VEEP membership in CEDS. Review information available from the following sources: CEDS, ECHO, as appropriate.	Compliance review initiated by email with link to VEEP membership in CEDS sent to appropriate contacts from the RO, CO and Enforcement.	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. CO Division of Enforcement contacts: Water Enforcement: Wetlands Enforcement: Land Enforcement:	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. RO and CO contacts can recommend an	Within three weeks of receiving compliance review request.

Office	Action	Results	Estimated Timeframe
	Air Enforcement: Stormwater Enforcement: <i>Other</i> Accounts Receivable: Water Supply Planning Program:	application be held while compliance issues are addressed.	
LT	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. The LT subgroup includes the appropriate regional director and any other pertinent LT members.	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 in CEDS. 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 completion for approved compliance checks.	Within two weeks of receiving final compliance feedback.

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 put on a compliance hold 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 other 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 EMS track 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 noticed 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 recorded in CEDS. There is a VEEP box on the member's main page that indicates at what level of the program a facility is participating. 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.

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 the application period, 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 delegated to Lead Reviewers.
3. Application is reviewed for completeness by Lead Reviewer.

4. Compliance review is conducted by Lead Reviewer and appropriate regional contact(s).
5. Application review is conducted by Lead Reviewer and recorded in CEDS.
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 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, and added or confirmed to be linked to that membership in CEDS, that information is passed on to the appropriate Regional Office compliance contact(s). 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, webinars, 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 certificate. Renewing members and members changing levels will get an electronic renewal letter and certificate listing their join and renewal dates, which can be used to update their existing plaque. Members at the E3 and E4 levels also receive a VEEP flag. Plaques are generally mailed with the acceptance letter. Flags are given only to new members during recognition ceremonies, unless requested. In addition, E4 facilities may choose to purchase a large outdoor VEEP flag. The flags are purchased directly from the vendor by the E4 member. Flags are approximately \$110.

Many facilities request a recognition ceremony to mark either their acceptance into the program, renewal or movement from one level to another in the program. 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.

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 member'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.

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.

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.

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 member 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 member’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 member to demonstrate that the intent and equivalency of their proposal is consistent with currently established compliance methods. Members requesting the use of an ACM must submit the Alternative Compliance Method Request Form.

6.3 *Single Point of Contact*

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

7.0 Annual Performance Reporting

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

7.1 Annual Report Overview

VEEP EMS track members are required to submit annual reports by April 1 for the previous calendar year. Annual Reports include data on the environmental indicators selected by the applicant in its application. Required data begins with a baseline, developed from the year the member was accepted into VEEP or renewed its membership. Reports are prepared using standardized units and DEQ provides a list of common conversions. VEEP's online reporting system using the [myDEQ](#) portal allows for online registration and submittal of Annual Reports. It also allows facilities that have missed the reporting deadline to submit a report.

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

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

7.2 Annual Performance Reporting Review Process

7.2.1 Reporting Website Preparation

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

7.2.2 Report Submission

Once the report is begun a member's report status is 'Draft'. Once an external reporter completes the report it can be 'Submitted'. 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

VEEP staff review submitted reports 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. This follow-up is indicated by the status of the report being changed to 'Information Requested'. This change is accompanied by an automated email to the external reporter that is customized by DEQ staff requesting the information. As changes and updates are made to reports the status of the report is changed to 'Under Revision'. Once revisions are complete the report can again be 'Submitted' for review.

7.2.4 Report Acceptance Procedures

Once any issues are resolved the VEEP report status is changed to 'Approved'. All changes of report status are conveyed to DEQ staff and the external reporter by automated email.

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 is considered to be 'not in good standing' and will lose eligibility for VEEP benefits and possibly have membership terminated. Members are not eligible for permit discounts if a report is not received.

7.2.6 Aggregate Report

VEEP staff have the ability 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'.

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 are contacted electronically 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 reminders along with an updated application. VEEP SP applications are generally due by March 1st each year. However, VEEP staff may grant renewal deadline extensions, when applicable.

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 and they will be removed from the VEEP website and their membership status in CEDS changes to 'Withdrawn'.

8.3 Membership Dismissal

Dismissal 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 dismiss a member will be made by the Office of Pollution Prevention to the Director of the Division of Environmental Enhancement. Members will have an opportunity to request a reconsideration of a termination decision by the Director of the Division of Environmental Enhancement. Once a facility has been dismissed from the program the membership status in CEDS is changes to 'Dismissed' and must reapply to be considered for future participation in VEEP.

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’. Those facilities not in good standing on December 31 will be ineligible for permit fee discounts the following year.

9.0 Information/Data Management

9.1 Overview

VEEP uses CEDS, the Enterprise Content Management (ECM) system, and various spreadsheets and documents to track membership and performance data. Records are maintained in accordance with the VEEP 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, changes in member status and level are tracked in this database. CEDS enables the tracking of renewal schedules and identifying program members that are eligible for incentives.

9.4 Archives

Applications approved on or after June 15, 2016 are stored electronically in ECM. Applications that cannot be stored in ECM will be stored by the OPP.

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