

# Flexibility Suggestions for Cooperative Agreement Program

*(WDNR had gathered these suggestions but has not edited or made any judgments on the merits of any proposals.)*

## Testing, Reporting and Record Keeping

- Reduce reporting, testing and/or monitoring requirements.
- Reduce testing for certain parameters that are related to other parameters.
- Less frequent pretreatment monitoring for pollutants not in system.
- Get rid of sampling for parameters not in feedstock (electroplating).
- Reduced pretreatment monitoring and reporting for low discharge facilities.
- Lessen sampling frequency.
- Lessen record keeping.
- Relief from daily records.
- Consolidated data reports.
- Streamline Title V reporting (fewer things to report on).

## Permitting

- One or two permit writers who can make decisions (too much back and forth with other people)
- Primary contact for all permits -- someone familiar with the facility
- Extended permits (up to ten years)
- No plan review for permit modifications
- If wastewater treatment or pretreatment modifications were prepared by a professional engineer, waive DNR plan review and approval requirement
- Permit flexibility for process modifications
- Streamlined/fast tracked reviews/permits for innovative technologies/pollution prevention activities
- Expedited permit reviews for firms that can demonstrate a reduction in releases (to change production cap based on releases)
- Expedited permitting
- Company-wide permit for portable sources
- Special landfill disposal permit
- Waive preconstruction notice period
- Like replacement exemption
- Multi-media review for expanded operations
- Combine Federal and State reinvention programs into a single agreement

## Standards/Regulations

- Expedited government assistance and decision making.
- Air emission caps for a facility.
- Greenhouse Gases.
- New source performance standards could be written to apply to all equipment and firms after a number of years (encourage creative replacement or upgrade of older polluting equipment with cleaner approaches to production).
- Flexibility in what you must submit if you want to try a new technology.
- remove barriers for establishments of a waste materials exchange.
- Develop regulatory summaries and measurement techniques.

- Look at soluble rather than total BOD's.

## **Compliance/Inspection/Enforcement**

- Extended compliance schedules for installation of innovative technologies/meeting more stringent standard; however, no penalty should be incurred for not meeting more stringent standards since they were "voluntarily" agreed to.
- Reduced inspection based on third party inspections/existence of EMS.
- No enforcement for violations discovered during 3rd party inspections based on correction of problem.
- Audit privilege.

## **Resources**

- Information sharing through the industry.
- Public sector endorsements of projects.
- Mentoring of small businesses.
- Pull POTW into negotiations.
- Credit for what was done with pollution prevention, waste minimization in the past.
- Financial assistance for ISO 14000