# Designing Regulatory Programs To Yield Success

## The PrintSTEP Approach

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Purpose of Session

- Evaluate a successful regulatory approach, known as PrintSTEP
- Make recommendations and identify key elements for designing a successful program
What is PrintSTEP?

- **Printers Simplified Total Environmental Partnership**
- An Innovative Multimedia Regulatory Pilot Program
- Designed by National Committee
PrintSTEP Goals

- Enhance environmental protection
- Increase use of pollution prevention practices
- Improve efficiency of the regulatory process for printers
- Improve efficiency of the regulatory process for state governments
- Enhance public involvement
- Provide motivation for stakeholders to participate
PrintSTEP Pilots

Testing PrintSTEP Concept

- EPA’s Office of Compliance entered into cooperative agreements
  - NH Department of Environmental Services
  - MO Department of Natural Resources
  - MN Pollution Control Agency
PrintSTEP Structure

Pilots

- States convene local advisory group
- States tailor national PrintSTEP workbooks to include state/local requirements
- National Advisory Group
  - EPA/OECA, states, trade associations
  - Hold monthly calls to assist with implementation
Why the Printing Industry?

- Generally Non-Controversial
- Many Large and Small Facilities
  - Majority Are Small
- Compliance Obligations
  - Air, Water and Waste Requirements
PrintSTEP Overview

- Allows Printing Facilities to Volunteer
- Does Not Change Existing Environmental Regulations
  - Changes the process for implementing requirements
- Regulates multi-media
  - Air
  - Waste water (including storm water)
  - Hazardous Waste
- Consolidates requirements into a single enforceable agreement
PrintSTEP Foundation

- Regulatory Simplification
  - Consistency in regulatory conditions
  - Printers receive plain language workbook
  - Single POC
  - One enforceable agreement

- Pollution Prevention

- Operational Flexibility
  - Easily change between levels

- Meaningful Public Involvement
PrintSTEP Benefits

Better Environmental Results

- Includes Small Printers Not Covered Before
- Increased Availability of Technical Assistance
- Promotes Pollution Prevention (P2)
- Better Understanding Promotes Compliance
- Better Understanding On Cumulative Impacts
Why Printers Like PrintSTEP!

- Regulatory Simplicity
  - Air Determinations based on “Actual Emissions”
  - Easy to understand
  - Simplified method for compliance

- Operational Flexibility

- Tangible incentives to implement P2

- Technical Assistance
  - Telephone and On-site
NH’s PrintSTEP Experience in Designing a Successful Program

Tara E. Olson
NH PrintSTEP Coordinator
Key Elements of Designing a Successful Program (NH)

• Partner with Knowledgeable Representatives

• Tailor Reference Material and Implementation to Industry

• Devote Resources for Program Success
Partner with Knowledgeable Representatives

- Formation of National Advisory Group
  State
  EPA/OECA
  PIA/GATF
  SGIA
- Formation of Local Advisory Group
  State
  Environmental Justice Groups
  Trade Association
  Audubon Society
  Legislative Affiliations
Partner with Knowledgeable Representatives (cont’d)

Outreach and Implementation

• Small Business Technical Assistance Program – NH DES
• PINE – Printers Industry of New England
• SBDC – Small Business Development Center
• NH Pollution Prevention Program – NH DES

*Continued Support throughout Program
Tailor Reference Material and Implementation to Industry

• NH Developed Plain Language Workbook
  ➢ Trade Association(s), Regulatory, Community Stakeholders Input and Review
  ➢ Included multi-media regulatory requirements (comprehensive and complicated)
  ➢ Provided extensive examples specific to Printers
  ➢ Required application/commitment to the program
Tailor Reference Material and Implementation to Industry (cont’d)

• Upfront Industry Research
  - Business Industry Lists, Phone, Mailings
  - Know your audience

• Implementation of the Program
  - Workshops
    - 12 Workshops Around the State to Introduce Program
    - Detailed the Program
    - Provided Assistance (clear upfront additional assistance was going to be necessary to come into compliance)
    - Encouraged Participation (100 attendees)
NH Printers

• Almost 20% Industry Participation
• Primarily small businesses
• 44 “Notification” status printers; 3 “Agreement” status printers
• Size Range (#employees)
• Diligence/Lots of hand holding
Devote Resources for Program Success

• Develop, Foster, Relationship Building
  ➢ One point of contact

• Continued Assistance
  ➢ Application Assistance (technically required compliance)
  ➢ One on One Technical Assistance
  ➢ Site Visits
  ➢ Annual Reports/Certification

• Compliance Challenges for NH Printers
  ➢ NH’s Air Toxics Program
  ➢ Changes in Hazardous Waste Rules LQG and SQG
Devote Resources for Program Success (cont’d)

- Recognize/react when something isn’t working
- Development of a computer based model to aid in Air Toxics Compliance
The Future of PrintSTEP in NH

- Pilot extended to 2008
- Since Inception 3 new printers, 2 larger printers being evaluated
- Mandatory vs. Voluntary Program
- Will likely require a fee
- Model Used for Automotive and Dry Cleaner Programs
- Consistent with other Programs (ERP)
MO’s PrintSTEP Experience in Designing a Successful Program
St. Louis, Missouri

Todd Crawford,
Missouri DNR
PrintSTEP Manager
Interagency Cooperation leads to operational flexibility

- Permit variance from the Missouri Air Conservation Commission
- Simple notification to agency for air emissions increase
- Operational flexibility was incentive to participate.
Interagency Cooperation leads to streamlining

- MO DNR developed MOUs with:
  - St. Louis Division of Air Pollution Control
  - St. Louis County Health Dept.
  - Metropolitan St. Louis Sewer District
- Permit modifications took 2-3 days.
- Streamlining was another incentive to participate.
On-site Visits Provide Technical Assistance

- MO PrintSTEP coordinator visited each participating facility at least twice.

- Provided multi-media technical assistance and suggested changes to improve environmental performance.

- Technical assistance was incentive for participation.
Public Outreach

- MO DNR formed local stakeholder advisory group.
- Conducted extensive outreach activities to inform public and elected officials.
- Did not receive any comments from public on PrintSTEP pilot.
- Public needs to perceive problem in order to participate.
- Public participation was not perceived as an incentive for printers.
The Future of PrintSTEP in MO

Many Factors Pro and Con:
- New Agency Leadership
- Department Reorganization
- Size of project
- Low Key Project
- Not integrated into programs
- Strong industry & small business rapport
Key Elements of a Successful Program

Recommendations

Cheryl Keenan
Abt Associates Inc.
Plan ahead

- Identify your specific goals and your evaluation strategy up-front

- Ensure that sufficient incentives exist to attract participants to new programs
  - Vet the idea with a sub-set of target audience
Plan ahead (cont’d)

- Know your audience
  - Tailor reference materials
  - Meet with target audience to explain new program

- Assess interest in a public participation component when designing the program
  - Do this locally where appropriate
Implement it right

- Devote resources for program success

- Partner with knowledgeable stakeholders to enhance outreach and implementation
  - Industry partners increase credibility and technical validity of the program
  - Community partners help assess the public’s role
Implement it right (cont’d)

- Define a process for maintaining regular communication with stakeholders
  - Especially important for multiyear programs

- Provide technical and compliance assistance to program participants
  - One-on-one, onsite assistance is most effective
Keep it going

- Implement improvements even after the program begins
  - e.g., developing online tools requested by participants

- Apply effective elements of program elsewhere
PrintSTEP Evaluation

- Report will be final in summer 2006.

- Prepared by Abt Associates Inc. under contract with EPA’s Office of Compliance.

- Available from EPA and state pilots at:
  - [www.epa.gov/compliance/assistance/sectors/printstep.html](http://www.epa.gov/compliance/assistance/sectors/printstep.html)
  - [http://www.dnr.mo.gov/printstep/index.html](http://www.dnr.mo.gov/printstep/index.html)
Next Steps for PrintSTEP

- PrintSTEP was a successful pilot experience because it identified what worked well and what areas need improvement.

- EPA’s Office of Compliance will:
  - share information on results and lessons learned with other states, as well as within EPA
  - meet with states interested in setting up similar programs.
Designing a Successful Program

- Questions on PrintSTEP experience as it relates to key elements of a successful program?

- Questions on recommendations for designing a regulatory program to yield success?