



# Frequently Asked Questions

## Why should my facility apply to National Environmental Performance Track?

Performance Track members receive a wide variety of benefits that include low priority status for routine inspections by EPA, public recognition, regulatory incentives, and opportunities to collaborate with EPA officials.

## Who can participate in Performance Track?

Public or private U.S. facilities of any type, size, complexity level, or economic sector can participate in Performance Track. Multi-facility corporations are encouraged to develop company-wide policies supporting membership across their facilities, such as corporate Environmental Management System (EMS) policies. However, facilities applying within a corporation must meet program requirements individually.

## What does it cost to participate in the program?

There is neither an application nor a membership fee for Performance Track. EPA designed this program to be an inclusive, voluntary, and flexible program. The amount of time and money a facility invests in improving its performance varies depending on the size of the facility and the types of environmental improvements sought. Many facilities find that investments in pollution prevention and other environmentally preferable practices produce real savings and improve their standing with their community and with regulatory agencies.

## How can my facility apply?

You can complete, save, revise, review, and submit an electronic application through Performance Track Online at [www.epa.gov/performance-track/apps/app.htm](http://www.epa.gov/performance-track/apps/app.htm). After submitting the form, you should also fax a copy of your completed and signed Application and Participation Statement to the Performance Track Information Center at (617) 354-0463. Ninety days after the close of the recruitment period, you will receive notification whether or not your application was approved. EPA will announce new members via the National Environmental Performance Track website [www.epa.gov/performance-track/](http://www.epa.gov/performance-track/). Those not accepted will receive a brief explanation for EPA's decision and are eligible to reapply at any point, once they are able to demonstrate that they meet the criteria for participation.

## Can I view the entire application before registering at Performance Track Online?

Yes. You can view a modified PDF version of the application prior to logging on to Performance Track Online at [www.epa.gov/performance-track/apps/app.htm](http://www.epa.gov/performance-track/apps/app.htm). Please note that the application must be submitted via Performance Track Online. If you need assistance, contact the Performance Track Information Center at 1-888-339-7875.



## **When is the Performance Track application deadline?**

EPA accepts applications twice a year, April 1 - May 31 and September 1 - October 31. Performance Track offers links to programs that support potential members complete an application at [www.epa.gov/performancecetrack/ptrackassist.htm](http://www.epa.gov/performancecetrack/ptrackassist.htm).

## **Can I talk to a current Performance Track member prior to applying?**

Yes. The Performance Track Mentoring Program allows prospective members interested in learning about and applying to Performance Track to speak with a current member. The mentor can provide you with a member's perspective on the program as well as guide you in setting performance goals and setting appropriate performance measurements that can be easily transferred to the Performance Track application. Please visit [www.epa.gov/performancecetrack/mentoring.htm](http://www.epa.gov/performancecetrack/mentoring.htm) for additional information.

## **What are my obligations to Performance Track once I become a member?**

Members are expected to submit an Annual Performance Report, which demonstrates compliance certification and progress on environmental goals. Other Performance Track obligations include good faith efforts towards continuous improvement, maintenance of your EMS, and dedication to community outreach.

## **How can I tell if my facility's EMS meets the Performance Track requirements?**

The Performance Track EMS elements are based on a Plan-Do-Check-Act model. Facilities applying to the program should have an EMS that has been in place for at least one full cycle, which is usually one full year. Additionally, Performance Track requires that an independent assessment of the EMS must have been completed within the past three years. The assessment itself must be performed according to a protocol, which is covered in the application instructions. If you are certified to ISO 14001 and have made a commitment to sharing information with your community about your environmental performance, you have met this requirement for an independent assessment of your EMS. Other non-ISO independent assessments may also meet Performance Track EMS requirements. Please note that EPA recognizes that the scope and complexity of an EMS varies depending on the nature, size, and operations of a facility. For additional information, visit [www.epa.gov/performancecetrack/program/ems.htm](http://www.epa.gov/performancecetrack/program/ems.htm).

## **Do I have to be ISO 14001 registered to be in the program?**

No. Members are not required to be ISO 14001 registered in order to participate in Performance Track. While many Performance Track members are ISO 14001 registered, or have self-declared that they meet ISO standards, other members have opted not to use ISO, instead following industry trade association EMS templates, or developing a totally independent facility EMS. In all cases, Performance Track members are now required to have an independent 2nd party or 3rd party review of their EMS and must meet the compliance criteria of Performance Track.

Visit the following website to learn more about the independent EMS review requirement:

[www.epa.gov/performancecetrack/ind\\_assessment.htm](http://www.epa.gov/performancecetrack/ind_assessment.htm).



## **What types of environmental performance improvements are eligible for credit under Performance Track?**

EPA recognizes many categories of potential environmental improvements, including energy use, water use, discharges to water, air emissions, waste generation, conservation or preservation, and product performance. Improvements within these categories are further defined according to specific aspects, such as elements of an organization's activities, products, or services that can interact with or impact the environment. A facility must have made previous improvements in at least two aspects (one aspect for small businesses) and commit to future improvements in at least four aspects (two aspects for small businesses). Performance improvements made as part of a federal or state partnership program are also eligible for Performance Track credit.

## **How do I choose measures for reporting past environmental performance?**

The Environmental Performance Table (found in Section C of the Performance Track Application) lists a broad range of environmental measures and impacts for environmental reporting. Not all of these environmental impacts will be relevant to your facility. In the Table, the categorical types of environmental impacts are organized by quantifiable "indicators."

## **Can a company official sign the Application and Participation Statement even if they are not the facility or plant manager?**

Yes. The Application and Participation Statement (Section E of the Application) requires a signature by someone who is fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to the program. A corporate official could meet this test. The person signing the certification should have enough knowledge of the facility to truthfully and accurately attest to its compliance status, EMS implementation, and overall eligibility for the program. The person should be authorized on behalf of the facility to sign the statement and should have a significant level of management responsibility for the facility in question.

## **Can multiple facilities apply with one application?**

No. Performance Track will not accept a multiple-facility application. However, on a case-by-case basis EPA may accept an application from a single facility with multiple locations. The applicant should coordinate with EPA prior to submitting an application for a multiple-location facility. In order for multiple locations to be considered part of one facility, activities at the separate locations should be governed by a common EMS and all of the operations across the various locations should be interrelated. The regulatory profiles for the separate locations must also meet the compliance criterion, such as passing the compliance screen. Additionally, the separate locations should generally be in close geographical proximity and should not have unique environmental and/or community concerns. To ensure that an application is consistent with the program's facility approach, please direct questions to the Performance Track Information Center at 1-888-339-7875.



## **My facility already participates in another partnership program or a similar state program. Should I still join Performance Track?**

Yes. Performance Track builds on EPA's existing voluntary programs and many state performance-based environmental programs. EPA encourages facilities to maintain existing participation in other EPA partnership and state programs while joining Performance Track. Participation in other EPA voluntary programs can count as an environmental goal in Performance Track. Performance Track has created various tools that will help facilities participating in state programs identify any additional steps needed to satisfy Performance Track requirements.

## **How do states fulfill the incentives offered by the program?**

Performance Track works closely with states to identify ways to implement Performance Track incentives at the state level, harmonize reporting requirements for members of Performance Track and state performance-based environmental programs, and provide joint recognition of members. EPA already has signed a Memoranda of Agreement (MOA) with 12 states, and currently is developing such Agreements with several others. MOAs serve to recognize the collaborative relationship between Performance Track and these states, and acknowledge commitments to jointly pursue activities, including incentives implementation, that benefit member facilities. Also, the Environmental Council of States (ECOS), representing state environmental commissioners, is working closely with EPA to integrate Performance Track into the activities of each media program office and to encourage states to adopt a more active state role in implementing incentives. For more information on how individual states are implementing Performance Track incentives, please see [www.epa.gov/performancetrack/partners/index.htm](http://www.epa.gov/performancetrack/partners/index.htm).

## **I have a small facility. Are there any special considerations for small facilities that want to participate in Performance Track?**

Yes. Your facility qualifies as a small business if the company as a whole is a small business as defined by the Small Business Administration (SBA) (see FR 30386, Vol. 65, No 94, May 15, 2000) and the facility itself employs fewer than 50 full-time equivalent employees. Small facilities are asked to demonstrate past achievements in one environmental aspect rather than the two required by other facilities, and two future goals rather than the four required by other facilities.

## **What is the Performance Track Corporate Leader designation?**

The Performance Track Corporate Leader designation within Performance Track recognizes corporate leadership that encourages environmental performance beyond regulatory requirements both within the company and throughout its supply and customer chains. EPA will designate up to three Performance Track Corporate Leaders per year for a five-year membership. Applicants for the corporate designation must meet specific criteria and demonstrate strong corporate management of environmental issues, public outreach, and reporting. For more information on achieving a Corporate Leader designation, please contact Dan Fiorino at [Fiorino.Dan@epa.gov](mailto:Fiorino.Dan@epa.gov).

For additional Frequently Asked Questions, visit  
**[www.epa.gov/performancetrack/faq.htm](http://www.epa.gov/performancetrack/faq.htm)**