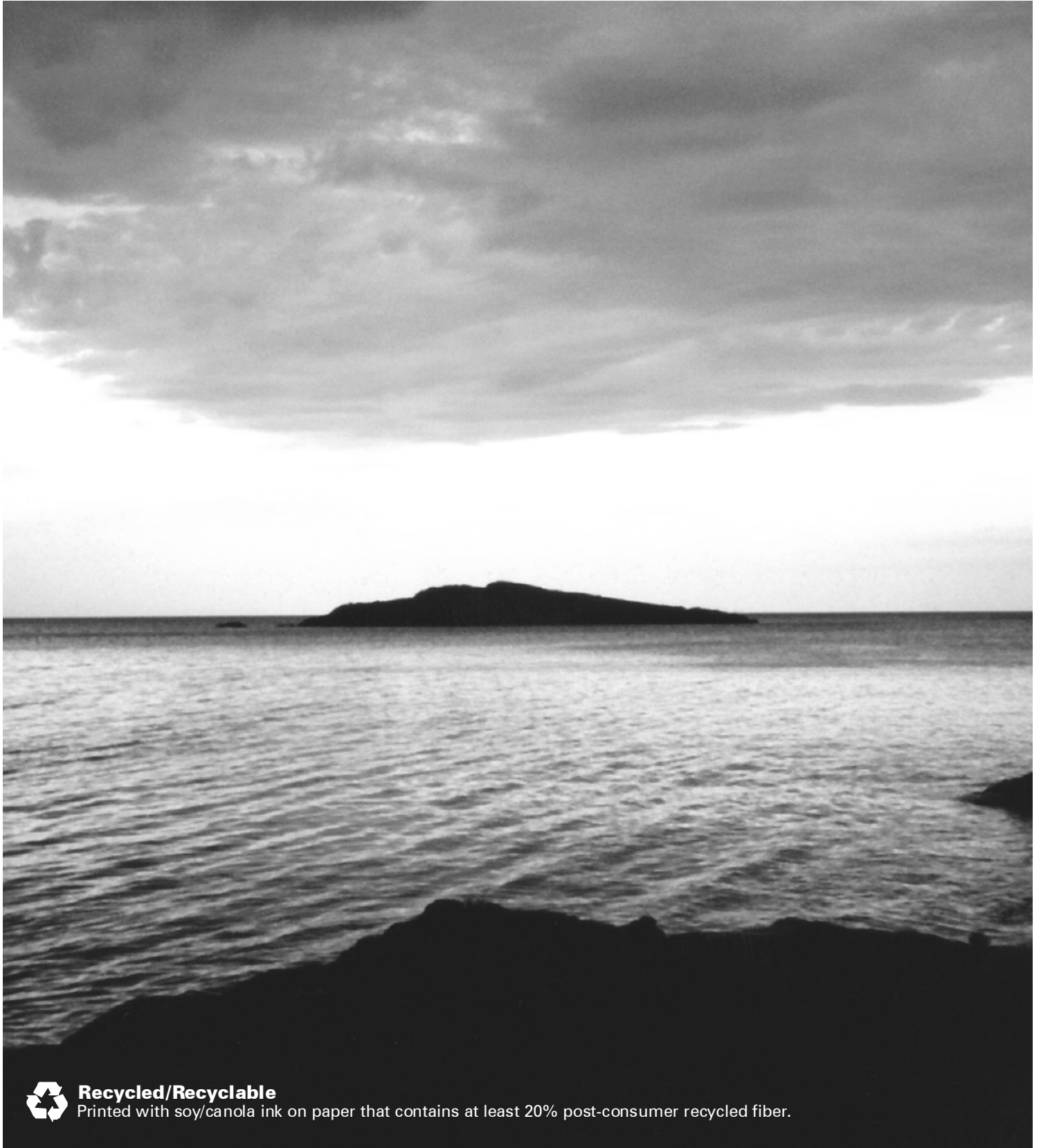




Customer Service in Region 5



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

December 23, 1996

REPLY TO THE ATTENTION OF:

On behalf of the Region's Senior Leadership Team, I am pleased to accept this report, Customer Service in Region 5, and wholeheartedly endorse its recommendations. Not only is it critical that we listen to our customers, but it is extremely important that we change the way we approach our business where necessary to be responsive to their concerns. By implementing these recommendations, I am confident we can improve our service to the citizens of Region 5, resulting in a better environment for all.

I would like to thank the following members of the Customer Service Task Force for their efforts in planning the stakeholder meetings discussed in this report and for developing the recommendations for us to implement:

Jennifer Beese
Jeffrey Kelley
John O'Grady
Phyllis Reed
Kenneth Westlake

Beatrice Daviston
Norman Niedergang
Daniel O'Riordan
Dianne Sipe

Limited copies of this report are available from the Office of Public Affairs. The report is also available electronically, both on the Internet (<http://www.epa.gov/region5>) and on the Region 5 Intranet.

Together, with our customers, we can solve environmental problems, with communities, in common sense ways.

A handwritten signature in black ink, appearing to read "Valdas V. Adamkus".

Valdas V. Adamkus
Regional Administrator

Customer Service in Region 5

A Report from the Customer Service Task Force to the Senior Leadership Team

December 1996

Background

As part of the Administration's efforts to reinvent Federal government and its interaction with its primary customer—the American taxpayer—President Bill Clinton, on September 11, 1993, issued **Executive Order 12862: Setting Customer Service Standards** to every Federal department and agency, requiring each to publish readily available customer service plans by September 1994. In response, the U.S. Environmental Protection Agency developed and published *Putting Customers First: EPA Rises to the Challenge of Executive Order 12862*¹ and, as follow up, *Putting Customers First: EPA's Customer Service Plan*². In these documents, EPA reaffirmed its commitment "... to providing the best customer service possible... (and) to achieve this through increased public participation, increased public access to information, and more effectively responding to customer needs." EPA identified eight "core processes" around which further customer service tasks were assigned: permitting and licensing; pesticide registration; research and demonstration grants; rulemaking; public access; State, Tribal, and local program grants; enforcement compliance assistance; and voluntary programs. EPA Headquarters has taken the lead in these ongoing efforts.

In Spring 1995, Region 5's Senior Leadership Team (SLT) established a Customer Service Task Force to focus on

Region 5 Vision, Mission, and Values

Environmental Vision

A sustainable environment where air, water, and land resources are restored and protected to benefit all life.

Operational Vision

Together, we can solve environmental problems with communities in common-sense ways.

Mission

Our mission is to:

- Protect human health and preserve natural resources;
- Prevent and abate pollution to improve the environment;
- Serve the public with education, innovation, action, and results; and
- Lead the way in restoring and protecting the Great Lakes and all Midwestern ecosystems.

Values

Region 5 aspires to be a Region which respects all people, personally and professionally, and which demonstrates integrity and honesty in all of our dealings. We strive to communicate effectively in our work and to listen to the people we serve, with a preference for action to solve problems and achieve results.

In doing so, we hope to provide effective leadership and build strong partnerships with State, Tribal, and local governments and other Agencies in protecting the environment, and ensuring a future where air, water, and land resources are restored and protected to benefit all life.

¹*Putting Customers First: EPA Rises to the Challenge of Executive Order 12862*. U.S. Environmental Protection Agency Office of Policy, Planning, and Evaluation. September 1994.

²*Putting Customers First: EPA's Customer Service Plan* (EPA 230-B-95-004). U.S. Environmental Protection Agency Office of Policy, Planning, and Evaluation. September 1995.

efforts to improve customer service at a regional level. The SLT also determined the Task Force's first projects: an all-employee memo from Regional Administrator Valdas V. Adamkus proclaiming the Region's emphasis on customer service (Appendix A), and the expanded use of an existing customer comment and feedback card (Appendix B).

Concurrently, Region 5 was in the midst of a fundamental reorganization, initiated October 1, 1995. The SLT wished to share the nature of the reorganization and its newly developed Mission, Vision, Value statement (see box on page 1) with key extramural groups, many of which were the same groups from whom the Task Force wished to hear. The two efforts were combined, and a series of stakeholder meetings were planned.

Methodology

Four key stakeholder groups were selected to take part in the pilot Region 5 Vision/Customer Service Rollout: environmental groups (May 13, 1996); business and industry (May 20, 1996); small business (May 31, 1996); and local government (June 21, 1996). The Task Force identified 20 or more appropriate invitees to each session (invitees needed to be within a day's travel of Chicago), with the goal of 15-25 attendees at each session. Invitations were extended over the telephone, with written follow-up materials (EPA's Customer Service Plan, Region 5 organization chart, Region 5's Community-Based Environmental Protection Action Plan, Region 5's Vision, Mission and Values) mailed to those who accepted. The SLT pledged that four of its members, including the Regional Administrator or one of his deputies, would participate at each session. Of the 16 environmental groups that accepted an invitation to the May 13 session, 11 attended. Of the 19 business and industry representatives that accepted the invitation to the May 20 session, 14 attended. Of the 25 small business representatives that accepted the invitation to the May 31 session, 11 attended. Finally, of the 19 local government entities who accepted the invitation to attend the June 21 session, 12 attended. Most of those in attendance were from the Chicago area, but a fair number of participants came from other parts of Illinois, as well as southern Wisconsin and northwest Indiana. A list of attendees is provided in Appendix C.

Since routine, senior level meetings are held with our State and Tribal partners, we did not plan separate stakeholder sessions with them.

Agenda for Action

Environmental Priorities

Reduction of toxics, especially mercury	Brownfields redevelopment
Ensure environmental justice	Sediment clean up
Attain air quality standards for ozone	Protect and restore critical ecosystems

Principal Places

Lake Superior	Lake Michigan	Lake Erie
Upper Mississippi River	Greater Chicago	Southeast Michigan
Gateway (East St. Louis, IL)	Northeast Ohio	Crandon Mine
Tribal lands	International	Northwest Indiana

Critical Approaches

Internal resource investments for change	Community based environmental protection
Using common sense	Preventing pollution
State/Local/Tribal Partnerships	Enhanced public communication
Enforcement and compliance assurance	Multimedia approaches
Risk and science-based decision making	Measuring and managing for environmental results

The agenda for the sessions (Appendix D) devoted the morning to an explanation of the Region's Vision and reorganization. The afternoon session focused on customer-service related issues (some of the meetings dispensed with lunch, running through the entire agenda by early afternoon). Notes from each of the meetings are provided in Appendix E. The tenor of the meetings was cordial, encouraging free and open discussion.

Universal Customer Service Standards

In carrying out our mission to protect public health and the environment,

1. We will be courteous, professional, flexible, honest, and helpful in all dealings with our customers. We will actively listen so we can better understand what motivates our customers and how we can best provide the environmental products, services and information they value, and be fully responsive to customer concerns and needs regarding our services.
2. We will answer all telephone calls promptly, and will respond to them by close of the next business day. If the person receiving the call cannot fully respond to the inquiry, the customer will be accurately referred to someone who can.
3. We will respond to all correspondence within 10 working days of receipt. If we cannot provide a complete reply within 10 working days, we will contact the customer as soon as possible within the 10 day period to acknowledge and clarify their request, discuss what is required to provide a full response, and determine when they will receive a full response.
4. We will provide our customers with clear, easy to understand, timely, and accurate information about products, services, policies and procedures. We will ensure that customers have easy access to information, available through convenient channels, and in various formats.
5. Relationships with our co-implementors of environmental programs, the State, Tribal and local governments, and other Federal agencies, will be characterized by partnership, flexibility, and assistance that empowers them to expand their ability to deliver environmental protection.
6. We will seek customer input to inform our decisions on policies, programs, and rules.

Feedback Received

The following section summarizes some of the common concerns raised at the meetings and provides Task Force responses and recommendations.

Flexibility

Comments

The need to provide various types of increased flexibility was raised by each of the stakeholder groups. Environmental groups felt EPA needed to be more flexible in how priorities are set. Business representatives stated we were at our best when our staff found ways to be flexible and at our worst when we rigidly applied policies and regulations. One participant remarked that our values should serve to bound how far we can be flexible. The need to be open to innovative approaches and emerging technologies was highlighted. Local government representatives felt that the "Region often fails to see flexibility intended by headquarters regulation writers."

Response

Through our operational vision we hope to redirect our efforts to solving environmental problems, rather than the simple application of media-specific regulations. Our decisions must always be consistent with our statutes and regulations, but the critical approaches the Region intends to use in

solving these problems, such as common sense, compliance assurance, and community-based environmental protection, all demand increased flexibility from regional employees. Agency initiatives such as Project XL (“Excellence and Leadership”) specifically allow for regulatory flexibility where superior environmental results can be achieved. We have found that local comparative risk and other environmental priorities projects, either funded or not funded by EPA, are excellent methods for working with local communities to identify priorities and plan action.

Recommendations

1. For each principal place where the Region focuses, stakeholder input will play a critical role in developing an agenda for identifying and prioritizing environmental problems to be solved.
2. The Region will actively participate in the Agency’s Project XL in order to provide maximum regulatory flexibility to accepted projects.
3. The Region will reinforce with its own staff its duty to “Serve the public with education, innovation, action and results,” with the understanding that increased flexibility is necessary for this innovation.

Individual Staff Responsiveness

Comments

Environmental groups expressed frustration with “flip” answers and the “unresponsiveness” of EPA employees. Large businesses suggested that EPA staff need to be more “civil and well-informed.”

Response

Improving staff responsiveness is a key component of the universal customer-service standards recently developed by Headquarters (see Box below). These standards call for all EPA employees to be courteous, professional, flexible, honest, and helpful. In addition, the standards commit each employee to responding to all telephone calls by the close of the next business day. If the person receiving the call cannot fully respond to the inquiry, the caller will be accurately referred to someone who can. With regard to written correspondence, the new customer-service standards will commit employees to responding to all correspondence within 10 working days. If this is not possible, the writer will be contacted as soon as possible to acknowledge their request, and determine when they will receive a full response. The universal customer service standards and the standards for each of the Agency’s core processes are included in Appendix F.

Recommendations

4. Aggressively roll-out the customer-service standards to staff and determine what follow-up training may be appropriate.
5. Develop systems to measure performance under the standards.

Lengthy Permit Process

Comments

One small business representative was particularly concerned about the seemingly inordinate amount of time needed to issue a permit for a simple activity. The permitting process was

characterized as “pure red tape.” Other business representatives referred to the Clean Air Act Title V permit program as the “most inflexible operating system ever.” Since business expansion often hinges on these permits, timeliness can be of critical importance.

Response

In July 1994, the Agency formed a Permit Improvement Team (PIT) to develop recommendations to improve the effectiveness and efficiency of the permitting process. The PIT, which includes representatives from EPA Headquarters and Regional Offices and state, tribal and local permitting agencies, held numerous stakeholder meetings to solicit input on the most critical issues. On May 10, 1996, the PIT’s recommendations were published in the *Federal Register*³. The recommendations include:

- Permitting agencies’ review of permits should be more performance-based. Up-front technical reviews would be reduced to those needed to provide reasonable assurance that the permittee will meet performance standards.
- Permitting agencies should reduce the number of times permits need to be formally modified. Modifications would only be required when process changes would increase pollution, or when they are needed to insure proper operation or monitoring of a facility.
- Permitting agencies should use the permitting process to encourage facilities to practice pollution prevention.

Some of the recommendations included in the *Federal Register* will need further public input and may require regulatory changes to implement.

The Region cannot change the procedures used by State and local governments to issue permits, but can encourage changes by serving as a model for more streamlined permitting processes.

Recommendations

6. Each Regional program should develop a model time line to be followed in reviewing and responding to permit applicants. Programs should share a model- or facility-specific time line with permit applicants.
7. When a facility has multiple environmental permit applications pending, the Region should appoint a single point of contact to resolve any cross-cutting issues among the involved programs and to ensure a coordinated approach to reaching the permit decisions.

Level Playing Field

Comments

The business community, large and small, seeks a level playing field, where businesses and their competitors receive fair and equitable treatment, regardless of the jurisdiction in which they operate. Businesses that operate in multiple States or Regions complained that they often encounter inconsistent requirements from one jurisdiction to another, creating confusion over permitting and compliance requirements, and generating additional transaction costs. Business expressed the concern that “across Regions, decisions need to be consistent.” Environmental groups expressed

³*Federal Register*, vol. 61, no. 92, pg. 21855. May 10, 1996

concerns that pollution havens could be created in States with less stringent regulations or enforcement.

Business cited yet another factor that contributes to an uneven playing field: parties who operate outside the regulatory structure. One business representative asked, “how can the agencies identify and bring into compliance those who don’t notify and remain underground?” Another business representative offered, “Make rules more usable and understandable to reduce incentives [by those ‘underground’] to avoid regulatory framework.”

Response

EPA reviews authorized State programs for consistency with minimum Federal requirements. Minimum Federal requirements need to be clearly written and well disseminated both within government and to the regulated community, so that State and EPA staff can deliver consistent information as to what the national baseline is and where areas of discretion and flexibility exist. Improved staff training will aid in delivery of consistent regulatory messages across jurisdictions. EPA maintains a compliance and enforcement presence in addition to the States, in instances of: 1) a compelling Federal interest (e.g., interstate issues); 2) cases referred by the States; and 3) cases where the States lack the interest or resources to tackle issues consistent with Federal enforcement policies. Federal enforcement penalties seek to recover the economic benefit of non-compliance, so that violators do not tilt the playing field by gaining an economic advantage over complying competitors.

Reduced Federal oversight and increased reliance on States for program implementation hold the potential for greater variability across States in their approaches to specific permitting and compliance/enforcement issues. EPA and the States must accelerate their shift to performance-based regulations and measures, so that the environmental results sought are consistent across jurisdictions but flexibility is enhanced on how those results are achieved.

With respect to the problem of noncomplying sources remaining “underground,” (i.e., beyond the knowledge of regulators), several States, including Illinois, have experimented with small-business amnesty programs. These programs, targeted at a given geographic area or business sector, use intensive publicity and cooperation with the business community to encourage non-notifiers and other unknown parties to identify themselves (often without penalty) and obtain technical assistance so as to achieve compliance. Ignorance of requirements and fear of enforcement are reasons often given by these parties as to why they did not notify. The Agency’s *Interim Policy on Compliance Incentives for Small Business*⁴ attempts to provide an incentive for these businesses to come forward to request compliance assistance.

State/Federal Relationship

Comments

Environmental groups called for more EPA oversight of States, expressing concerns that State government was more susceptible to economic and political influences from the regulated community. One commentator noted, “Better oversight is needed to ensure states are up to par.” Another noted, “Some States’ programs are more capable than others.” These commentators maintained that a strong Federal presence and increased Federal oversight would help ensure that

⁴Federal Register, vol 61, no. 107, pg. 27984, June 3, 1996

environmental issues of regional or national importance get proper attention, and that pollution havens aren't created by States seeking to improve their business climates.

Environmental groups, large businesses, and local governments all commented that EPA and the States needed to better align their priorities. Business complained, "EPA and the States need to solve the game of whose problem and decision it is" on a given issue. Big business continued by calling for better communication (including regular meetings) between EPA, the States, and industry. "On key projects, there needs to be more senior involvement of State and Federal management." Business regarded EPA regional office involvement in interstate issues as being "helpful."

Response

EPA and the States are pursuing better alignment through joint priority setting. *Strategic Directions for the Midwest Environment*⁵ is a jointly developed multi-year document that has established a number of over-arching themes for common emphasis. Building on this, the Region and States have identified a set of joint priorities. The Environmental Performance Partnership Agreements (EnPPA's) that EPA is establishing with the States pursuant to the National Environmental Performance Partnership System⁶ embody these common priorities and better define State and Federal roles in implementing both delegated base programs and special initiatives. The intent is to make State and Federal efforts more complementary rather than overlapping or duplicative. Development and implementation of EnPPA's will include stakeholder involvement, which should allow other governments, the regulated community, and the public a voice in setting priorities, solving place-based problems, and monitoring results.

EPA is shifting toward reduced oversight as experienced State agencies implement delegated programs. Performance Partnership Grants (PPG's) and block grants will give States greater flexibility, and shift the emphasis for accountability from administrative activity measures to actual environmental results. In the long term, less attention will be given to how a source complies or how a State runs a delegated program in favor of more emphasis on the environmental outcomes of performance. Intensive oversight is reserved for those State programs where capability is not demonstrated. Increased routine dialog between State and Federal agencies and stakeholders is needed to allow all parties, including skeptics, to see whether increased State empowerment actually produces better environmental results with lower transaction costs, and also to see that alignment on priorities actually occurs.

EnPPA's will also establish a clearer definition of State versus Federal roles, which should clarify for the agencies and the regulated community questions of jurisdiction over specific problems and decisions. By giving more authority to lower echelons of management, EPA hopes to reduce the need for senior management involvement to resolve issues. However, EPA commits to faster escalation of problems, and involvement of senior-level State counterparts, when issues with the regulated community or the public cannot be solved promptly at lower levels.

Recommendations

8. Finalize EnPPA's with four States during fiscal year 1997.
9. Finalize PPG's with two States during fiscal year 1997.

⁵*Strategic Directions for the Midwest Environment* (EPA 905-X-93-001), U.S. Environmental Protection Agency, Region 5, December 1993.

⁶*Joint Commitment to Reform Oversight and Create a National Environmental Performance Partnership System*, U.S. EPA and State/EPA Capacity Committee, May 17, 1995

Catalyst Role

Comments

Several of the groups identified a need for the Region to serve in a so-called “catalyst” role. This evidenced itself particularly in discussions about our new teams, especially the geographically oriented teams. Another catalyst role involved bringing other Federal and State agencies together around topics of mutual concern.

Response

For some program areas, such as ground-water protection, habitat protection, and endangered species, the Region has existing relationships with U.S. Geologic Survey, U.S. Fish and Wildlife Service, and State equivalent agencies. We also realize that we have not necessarily developed all the connections which would be desirable to deal with some newer topics, such as urban sprawl and land-use planning.

Recommendations

10. The SLT and regional managers should develop means for on-going dialogue among State, local and Federal agencies, Tribes and non-government organizations when addressing cross-agency topics or in response to identified community needs that are not within our responsibility. The Region should offer to be the convener of such dialogue, if appropriate.

Dissatisfaction with the Superfund Program

Comments

Business, small business, and local government officials complained that the Superfund process is unnecessarily laborious, inequitable, and inefficient, causing lengthy clean-up delays.

Response

EPA is already working to address the concerns expressed in the meetings. These concerns, and others, are why the Agency has issued three sets of administrative reforms. The Region is participating in these reforms and is supportive of the changes they will bring about. The Superfund issues, however, do appear to be of national concern, and not necessarily Region specific.

There are some concerns about Superfund that cannot be addressed except through statutory changes, such as retroactive liability, joint and several liability, etc. That is not to say, however, that these provisions could not be implemented more fairly.

While it is true that Superfund cleanups may have taken an inordinate amount of time in the past, current and future cleanups are following a much accelerated process. The Superfund Accelerated Cleanup Model uses emergency removal authorities to expedite site cleanups. Also, very few sites will be added to the National Priorities List (NPL) in the future; most will be handled by either voluntary cleanup or an accelerated Federal process.

Recommendations

11. Continue to work with States to build capacity to manage the Superfund program at State-lead sites, providing managerial and programmatic expertise as necessary to assist the State.
12. Ensure that our customers are aware of the administrative reforms we are taking as an Agency.

13. Solicit feedback and recommendations from small and big business/industry, environmental groups, and local politicians on the effectiveness of Superfund in their realm of experience, and address those concerns on an ongoing basis.

Multimedia Inspections

Comments

Multimedia inspections are a burden to facilities, overwhelming plant staff.

Response

The Region is committed to conducting multimedia inspections, which are a way to provide a comprehensive environmental assessment for a facility.

The on-site work for multimedia inspections generally is completed within 2 weeks. The Region feels that through careful scheduling, or the use of smaller inspection teams, the multimedia approach can be used effectively at smaller facilities than those the Region has already inspected, which are generally the larger facilities.

In fact, the regional multimedia inspection teams are already building upon what has been learned from previous multimedia inspections.

Recommendations

14. Continue to internally coordinate the results of inspections with other programs so that recommendations from one program contribute to the successful implementation of other programs.
15. Continue to develop the knowledge-base and glean more information from the multimedia inspectors and from industries where those inspections have been conducted. Each program that participates in multimedia inspections should be tapped for this information-gathering effort to determine what the inspectors and programs have learned from performing multimedia inspections that may assist in planning future multimedia inspections.
16. Trade associations, such as the American Petroleum Institute, Chemical Manufacturers Association, and National Association of Chemical Distributors, could be consulted regarding the value and benefits derived from multimedia inspections, and any possible improvements they may wish to suggest that would make multimedia inspections even more useful to the industry and the Region.
17. In an effort to promote partnership and cooperation between the regulated community and the Region, large corporations which have already undergone one or more multimedia inspection should be contacted to learn what has been useful, as well as what has not been useful, as a result of multimedia inspections at their facilities.

ISO 14000

Comments

Several large businesses encouraged EPA to take a leadership role in the ISO 14000 dialogue. ISO 14000 is a set of international voluntary environmental standards currently under development by

the International Organization for Standardization. ISO 14001, environmental management systems, will be the first standard to be completed under this effort.

Response

The Region will co-host, with the Global Environment and Technology Foundation and the American National Standards Institute, a conference on ISO 14001 on November 19 and 20, 1996, in Chicago. In addition, several of the pilot re-invention efforts underway in Region 5 and other Regional offices will evaluate the use of environmental management systems such as ISO 14001. Region 5 is participating on a national workgroup to explore the use of environmental management systems in the National Water Program.

Continued Dialogue with EPA; Increased EPA Visibility

Comments

All of the stakeholder groups appreciated the opportunity to meet with EPA, and encouraged the Agency to continue its dialogue with outside groups through future meetings and events. In addition, the stakeholders groups encouraged EPA to find ways to make staff more visible and accessible to external customers.

Response

The reorganization in Region 5 implemented on October 1, 1995, shifted the focus of the Region's resources to six key environmental priorities in ten principal places. The reorganization established Regional Teams to manage the Region's work in these areas. The result has been the creation of high-visibility initiatives in such places as Greater Chicago, Southeast Michigan, Northwest Indiana, and three of the Great Lakes.

The Region has had ongoing discussions about the idea of moving some employees into the "priority places" (see Agenda for Action box). In fact, there is an existing field office in the Northeast Ohio initiative area. The Region is in the process of detailing staff to the Upper Mississippi area as well and has placed three employees in the field to serve as Tribal liaisons. For some program areas, such as ground-water protection, habitat protection, and endangered species, the Region has existing relationships with U.S. Geologic Survey, U.S. Fish and Wildlife Service, and State equivalent agencies. We also realize that we have not necessarily developed all the connections which would be desirable to deal with some newer topics, such as urban sprawl and land-use planning.

Recommendations

18. To fulfill the Agency's commitment to community-based environmental protection, each of the regional place-based teams should consider assigning staff to the field to work more closely with our State and Tribal partners and be more accessible and effective in helping communities meet environmental challenges.
19. The Region's Senior Leadership Team and Customer Service Task Force should continue its dialogue with stakeholders in the coming year. The Region should take the series "on the road" to another metropolitan areas. The series should consist of four half-day meetings focused on stakeholder concerns and suggestions for improvement.

Measuring Success

Comments

Both environmental groups and businesses were interested in seeing the Agency move from the “bean-counting” mode of doing business to capturing the improvements made in environmental quality.

Response

The Agency as a whole and Region 5 in particular have been working diligently in the last several years to identify outcome-based measures of success and a standard set of environmental indicators. Several programs have developed environmental indicators and prepared annual reports for several years, but the Region has not yet achieved a consistent set of indicators or a Region-wide State of the Environment Report. We have recently developed a Region-wide indicator workgroup to this end.

Recommendations

20. Continue Region-wide move to outcome-based environmental planning, accountability, and reporting.
21. Prepare a pilot State of the Environment Report by the end of FY97 using environmental indicators; plan a full report in FY98; include a communication plan to share the State of the Environment Report with our customers.

Balance Compliance Assistance with Enforcement

Comments

Compliance assistance should be institutionalized as an Agency response to regulatory violations.

Response

Many of EPA’s programs have provided, and continue to provide, this type of assistance to regulated parties. Historically, however, the role and effect of the Agency’s compliance assistance may not have been as prominent as the role and deterrent effect of enforcement. In addition to preserving a level playing field and deterring violations through targeted enforcement actions, EPA will encourage compliance through incentives and, for small businesses seeking to comply with environmental requirements, more effective compliance assistance. This approach is consistent with the President’s and Vice President’s “reinventing environmental regulation” theme.

Enforcement is typically used after a violation has occurred. Compliance assistance, however, can be provided either “proactively” (e.g., where EPA takes the initiative to educate an industrial sector on regulations before a violation occurs) or “reactively” (e.g., after compliance monitoring of compliance incentives has detected or confirmed a violation, after a regulated party has requested assistance but before compliance monitoring or compliance incentives have detected or confirmed any noncompliance, etc.)

Several programs, EPCRA (Emergency Planning and Community Right-to-Know Act) Section 313, for example, host annual compliance assistance workshops just before the reporting deadline. Another example, the Toxic Release Inventory program holds at least one workshop per State.

Region 5’s Enforcement and Compliance Assurance Team has committed to develop a Regional Compliance Assistance Strategy which will put in place elements of infrastructure which will “routinize” assistance provided in conjunction with new regulations and actively market policies encouraging voluntary compliance. Additionally, the strategy will contain a specific plan for compliance-assistance projects which will be conducted during FY97. These projects will provide a clear near-term direction for the Region’s activities and include associated performance measures.

Based on the success of these initial projects, annual development of compliance-assistance projects will occur.

Recommendations

22. Complete the Compliance Assistance Strategy.
23. Provide training to affected regional staff on the role of compliance assistance in the Region's activities and on the Regional Compliance Assistance Strategy.

Regulatory Complexity and Technical Assistance

Comments

Enhanced technical assistance should be a goal of EPA, particularly as part of community-based environmental protection activities. The complexity and sophistication of environmental regulations necessitate formal and routine technical assistance availability for all EPA customers.

Technical assistance in regulatory interpretation is needed by many EPA customers. Most small businesses lack the internal expertise to fully understand the complex regulations, but small business representatives expressed a resistance to asking EPA staff technical questions, because enforcement was a feared outcome. Some companies stated they would only approach EPA through third parties such as attorneys or consultants, which can create a financial burden. Small business and local government participants suggested that outreach on regulatory requirements be conducted with sufficient lead time to provide for compliance, and also be easily understood. It was also encouraged that EPA investigate ways to improve the responsiveness and accuracy of advice provided by technical agency staff: the concept of one stop shopping for questions was encouraged. Environmental organization representatives also expressed the need to receive technical assistance on regulatory requirements and interpretation of environmental data. It was noted that as EPA expands its community-based environmental protection activities, more citizens and community groups will be seeking technical assistance.

Response

EPA, both regionally and nationally, is enhancing its institutional technical assistance programs. More widespread distribution and publication of hotline numbers will provide greater utilization of that resource. The EPA Office of the Small Business Ombudsman acts as a conduit for small businesses to access EPA. The Superfund and hazardous waste programs have each established Ombudsman positions. Information about these resources could be more widely disseminated to our customer base. Finally, pursuant to the Clean Air Act, all States are required to develop Small Business Technical and Environmental Assistance Programs. These are already operational and most programs offer multimedia assistance to small businesses. In conjunction with our State partners, EPA may direct businesses to these resources as technical assistance providers.

Within the Region, certain staff are responsible for working with specific industries and could serve as a point of contact for specific businesses seeking assistance. Likewise, the geographic-based team managers are logical contacts for community members who seek technical assistance. Development and implementation of customer service standards for EPA staff will reinforce the expectation that all staff are responsible for provision of timely, accurate and courteous service to all customers.

The regional programs are looking for better ways to communicate with and provide regulatory information to various customer groups. For example, the Greater Chicago Pollution Prevention Partnership, which is funded by EPA and includes business, government, and citizen groups, is exploring options to improve regulatory and assistance delivery systems in Cook County. Examples

include the planned development of an environmental quick response team and hotline, designed to provide 24-hour turn-around time to general regulatory questions. Also, as part of the Regional Compliance Assistance Strategy, the Region will be developing a process which routinizes outreach to industry on new regulations. In addition, the Office of Enforcement and Compliance Assurance in EPA Headquarters, in response to the Small Business Regulatory Enforcement Fairness Act (SBREFA), will be developing Compliance Guides to assist small business in understanding and complying with new regulations.

Recommendations

24. Develop a “contacts” list for each program and each geographic-based team, denoting who the public can call for help with specific problems.
25. Develop a program to further publicize the availability of Compliance Assistance Centers, hotlines, and other technical assistance resources.

Appendices

- Appendix A: Regional Administrator's Memorandum dated November 5, 1995, subject, "Customer Service"
- Appendix B: Regional Administrator's Memorandum dated November 5, 1995, subject, "Customer Feedback"
- Appendix C: List of Stakeholder Attendees
- Appendix D: Agenda for Stakeholder Meetings
- Appendix E: Flip Chart Notes form Stakeholder Meetings
- Appendix F: EPA's Customer-Service Standards, dated September 24, 1996

Appendix A**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5****MEMORANDUM**

DATE: November 2, 1995

SUBJECT: Customer Service

FROM: Valdas V. Adamkus
Regional Administrator

TO: All Region 5 Employees

In response to recommendations within the National Performance Review, the President issued Executive Order 12862: Setting Customer Service Standards. There, the President commented, "Putting people first means ensuring that the Federal Government provides the highest quality service possible to the American people. Public officials must embark upon a revolution within the Federal Government to change the way it does business. This will require continual reform of the executive branch's management practices and operations to provide service to the public that matches or exceeds the best service available in the private sector."

We have much to be proud of in our dealings with all of our customers--those people involved with or served by Region 5. Senior management efforts to break down internal barriers in order to move toward a multi-media approach have already borne fruit in improving our service to all customers, internal and external. The Region's reorganization will advance, expand, and refine these efforts. Customer service, in short, has always been one of Region 5's values. In any process, however, there is a need for continuous monitoring and improvement.

I would like to emphasize the following customer service guidelines:

- (1) As a regulatory agency, we often need to promote actions, activities, and attitudes to businesses, government, and individuals that they would not opt to take on their own, even when they understand it to be in the best interest of the general public. Our goal, therefore, is to build a cooperative and supportive relationship with these customers, supplying them with the tools they need to be able to pursue their business and personal activities in a way that protects the environment, and ensures - for all of us, for our children, and for future generations - a prosperous, sustainable, and healthy world.
- (2) In all of our relationships, voluntary and nonvoluntary, cooperative or enforcement-related, our goal is to handle all interactions in a fair, courteous, and professional manner. Our goal is also to provide affected parties with a clear understanding of the reasons for our actions.

With that in mind, let me present some interim goals toward which each of us in Region 5 may aspire:

Public Access: We will seek opportunities to increase the participation of our customers in the policy and decision-making processes of the Agency.

Listening to our Customers: We will improve our understanding of our customers' circumstances and motivations so that we can provide them with the environmental information and services they value. Through the use of public roundtables, focus groups, and formal surveys, we will listen to what our customers tell us about the quality and

value of the products and services we provide, and adjust our activities and resource allocation decisions accordingly.

Communicating with our Customers: We will communicate with our customers so that those who need environmental information know where they can obtain the information they need in a form they can use.

Reaching out to our Customers: We will provide our customers with the information they need to make environmentally sound decisions and to involve them in our decision-making and priority-setting processes.

Setting Clear Performance Standards: We will set clear performance standards for our products and services, assess how well we are meeting those standards, as well as whether they are the right standards, and adjust our activities based on what we learn from those assessments.

These are difficult days. Prospects of a furlough and a Reduction in Force weigh on us and our families. But during these days we should not lose sight of either our mission or our pledge to the people of Region 5. Let us reaffirm to ourselves the importance of our work and dedicate ourselves to our mission and our customers. That is the finest way, I believe, to show Congress and the American public that we earn our pay, every penny of it. Together, we can solve environmental problems, with communities, in common sense ways.

Valdas V. Adamkus

Appendix B

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

MEMORANDUM

DATE: November 2, 1995
SUBJECT: Customer Feedback
FROM: Valdas V. Adamkus
 Regional Administrator
TO: SLT

As you all know, we have formed a Region 5 Customer Service Task Force which has representation from all Divisions and Offices. The Task Force has begun to look at things we can do short term to collect customer feedback both internally and externally.

In recent months, the Pesticides and Toxic Substances Branch(PTSB) received OMB approval to use the attached postcard to collect feedback from external customers. The approval allows any EPA organization to use this card as long as the questions remain the same. Our only requirement is that OPPE be kept informed as to who is using the survey. You will also want to change the mailing code and phone number on the card prior to sending it out.


I am recommending that all Divisions and Offices begin using this card to ask our customers how we are doing. I suggest we use it as PTSB has outlined in the attached analytical plan, and focus on the core process of information management. This means including a card with our FOIA responses, any other written or phone requests for information, and possibly with other types of information sharing, or in connection with public meetings. PTSB is also implementing an electronic means of tracking responses. If your Division is interested in their method of tracking, the Branch will be happy to demonstrate their system for you to consider using in your organization. In order that the Regional Task Force be able to inform OPPE, share our experiences with the HQ Customer Service Steering Committee and be in a better position to design a Regional customer service strategy, I am asking that each Division/Office submit a brief plan to the Task Force, Attn: Norm Niedergang, by November 17, of how you intend to use this card.

If you have any questions, please contact Norm Niedergang or Phyllis Reed. You can contact Mary Lauterbach at 886-6004 to obtain copies of the postcard.

Attachments

Valdas V. Adamkus

A version of the comment card being used by Region 5.

 HOW ARE WE DOING?	
<i>Please help us understand how well our service at U.S. EPA is meeting your needs by completing this comment card.</i>	
<p>1. Did the information we provide: meet your needs _____ not meet your needs _____ Why? _____</p> <p>2. Was the person who assisted you knowledgeable and polite? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Please explain: _____</p> <p>3. How long did it take to get the information you requested? _____ days <input type="checkbox"/> N/A Was this reasonable? <input type="checkbox"/> Yes <input type="checkbox"/> No What would have been reasonable? _____</p>	<p>Comments/Suggestions</p> <hr/> <hr/> <hr/> <hr/> <hr/> <p style="text-align: center;"> Please feel free to call our office to discuss your comments at: (312) 886-2395 (800) 421-8431 (from IL, IN, MI, MN, OH, WI) THANK YOU VERY MUCH! Code _____ </p> <p><small>Public meeting hotline is estimated to average 2 minutes per response, excluding the time for reviewing correspondence, gathering information, and recording and entering the collection of information. Based on comments regarding the hotline system on one other aspect of this collection of information, making suggestions for reducing the burden to Chief, Information Policy Branch (312), 401 M St. SW, Washington, DC 20460, and to Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503</small></p>

Appendix C**Meeting Participants****May 13, 1996**

Thomas Anderson, Save the Dunes Council
 Rosemary Ashworth, League of Women Voters
 Ron Burke, American Lung Association
 Marian Byrnes, Southeast Chicago Environmental Task Force
 Jack Darrin, Sierra Club
 Dr. Kathryn Converse, National Wildlife Federation
 Keith Harley, Chicago Legal Clinic
 Joanna Hoelscher, Citizens for a Better Environment
 Michele Nanni, Hoosier Environmental Council
 Stephen Packard, The Nature Conservancy
 John Kelley, Illinois Environmental Protection Agency

May 31, 1996

Jeffrey Belmonti, Precision Plating
 Gabor Bushy, Suburban Buick
 Gerald Huot, Baron-Huot Oil Co.
 Glenn Juvingo, Toyota USA
 William Kulikowski, Phillip & Martin
 John McShane, Phillip & Martin
 Cecil Ransom, Toyota USA
 Glen Rustman, Johnson Press
 John Schauer, Schauer & Associates
 Bob Wilson, Wilson Rental

May 20, 1996

Edith Ardiente, Navistar International
 Bill Blackburn, Baxter International
 Bill Compton, Caterpillar
 Bill Constantelos, Safety-Kleen
 Michael Duda, Caterpillar
 Randy Farmer, Amoco
 R. Rivetna, American Can Co.
 Dale Kalina, R.R. Donnelley & Sons
 Stephen Lake, Walsh Construction
 Bob Marshall, American Maize
 Mike McGuire, John Deere and Co.
 Ralph Gotenschen, John Deere and Co.
 Jacqueline Powell, Ft. Howard Corp.
 William Robertson, Abbott Laboratories
 Julie Rossi, U.S. Dismantlement Co.
 Glenn Topping, USX Corp.
 William Van Horne, Fel-Pro Corp.

June 21, 1996

Robert Biedel, Southeastern Wisconsin Regional Planning Commission, Waukesha, WI
 Charles Lagges, Cook County Department of Environmental Control
 Bill Franek, Cook County Department of Environmental Control
 David Bennett, West Central Municipal Conference, Westchester, IL
 John Novinson, Village of Northbrook, IL
 Josh Goode, Indiana Association of Cities & Towns
 Dr. David Zenz, Metropolitan Water Reclamation District Of Greater Chicago
 Richard Sustech, Metropolitan Water Reclamation District Of Greater Chicago
 Allen Panek, Naperville, IL, Public Utilities Department
 Arnie Eggleston, City of Aurora, IL
 Phillip D. Peters, Northeastern Illinois Planning Commission
 Ginger Buchmiller, Cook County State's Attorney Office
 Bill Durkin, Mayor of Waukegan, IL

Appendix D

AGENDA
U.S. EPA/STAKEHOLDER MEETING
MAY __, 1996
LAKE MICHIGAN ROOM, 12 TH FLOOR
77 W. JACKSON, CHICAGO, ILLINOIS

9:30-9:35	WELCOME/PURPOSE
9:35-9:45	INTRODUCTION OF EPA ATTENDEES/GROUND RULES
9:45-10:30	INTRODUCTIONS OF INVITED GUESTS - HOW DO YOU INTERACT WITH US?
10:30-10:50	ROLL OUT VISION/GOALS
10:50-11:00	BREAK
11:00-12:00	DISCUSSION
12:00-1:30	LUNCH - ON YOUR OWN
1:30-1:40	CUSTOMER SERVICE PLAN
1:40-2:40	BEST/WORST EXPERIENCE WITH EPA REGION 5
2:40-3:00	BREAK
3:00-3:15	FOLLOW UP/RECAP
3:15-3:30	CLOSING

Appendix E

Stakeholder Meeting
Environmental Groups
May 13, 1996

FEEDBACK ON VISION/MISSION/VALUES

- Appreciate involvement in this discussion and vision.
- EPA training citizens in areas of concern, i.e. opacity violation.
- States in better position to do community based environmental protection (CBEP).
- How do these priorities and methods fit with EPA traditional mission/roles.
- What is CBEP really? Is it community driven really?
- Conflict between CBEP & risk based v. resource intensive
- Base of resources on rule making enforcement
- To be successful in CBEP:
 - Need clear simple list of guidelines of what EPA can & can't do.
 - Need a shopping list.
 - Be firm about where EPA responsibility lies. Tell people where resources going.
- How do we do information exchange between Federal Agencies across multiple programs. (Specialist list). [Lead shot in wetlands]
- Collaboration on research & diagnostic support.
- Environmental catalyst--not well defined
 - Staff already doing -- have time on their hands.
- Results may be hit or miss -- not well quantified.
 - May not have enough structure to get results.
- Common sense -- define it!
- Concept -- do we not want to do what seems "nutty" to public?
- EPA staff -- can they keep up?
 - This is broader issue than EPA -- applies in business, interest groups, etc.
- Do EPA and others feel too constrained by law?
- Community not defined.
- Community needs technical assistance.
- How do we ensure technical assistance for communities if we want them to be full partners?
- Beware conflict of interest?
- Partnership -- have specific goal in mind.
- National priorities:
 - Research, rulemaking, enforcement --not our priorities--concern too much emphasis on community-based--needs to have local support -- staff in communities
 - Need to have hammer in back pocket to be effective--need to use hammer to maintain credibility in community.
- Division of labor State/Federal?
 - Like what priorities and where. Concerned about how .
 - Trying to do things better suited for the States
- States not as politically insulated
- Think about satellite offices and geographically-based staffing
- Conflict between regulation and partner
- Better communication--
- Agree with priorities
- Environmental Justice (EJ) -- Representation not EJ at this meeting (lack of diversity)
- Different perspectives important to include
- Whole heartedly enthusiastic about community-based
- Does EPA mean it?
- Business needs to be a partner
- "The policeman is your friend" campaign

- Think up great examples; big examples; collaborative approach; advertise this approach. Get the word out that this is different. Need an example where it will work to prove.
 - Clear guidance to “consumers”
 - Understand limitations of groups which want to do collaborative work. No one can come to lots of meetings.
 - Need to get things done quickly with a small amount of staff time. But, we would like to help prove that this can work within resource limitations.
 - Partner vs. Enforcer -- business may not want to be at table with EPA. Don't sacrifice enforcement role for partner.
 - Opportunity for groups to come to EPA with ideas for community-based projects/support.
 - Do communities approach us for assistance or does EPA decide what to do?
 - Put out guidelines--rats/houses example -- not in priorities listed.
 - What happens when go into a community where problems are not in the “what” category.
 - 90-95% of transactions would work
 - What happens if one doesn't work? When is US EPA going to step out of partnership to protect the environment. Those 5% will be community based -- when communities come to EPA saying partnership not working.
 - EPA believed to be above local politics -- Community-based will draw back into local politics.
 - When deal with EPA people issue is if they can be problem solvers -- nurture staff who can “keep up”.
- Community is already thinking this way.
- How are you going know when you're manipulated by your partner--non-good faith by State or industry. Any partner could act in bad faith.
 - Common Sense -- double edged sword. This will not always well with community. Common sense changes -- PCB's over time. What does common sense mean?
 - EPA needs better response to active opposition. No response to EPA criticism -- falls on environmental groups to respond.
 - Better understanding of opposition -- clear up misconceptions earlier about environmental issues.
 - Get as smart as the opposition. Reality is that there are well-funded entities trying to undermine EPA programs and the Agency itself.
 - Department of Interior/Department of Agriculture have historic service component. EPA doesn't have this as role was more regulatory. Need to partner with other federal agencies -- some work already being done by other agencies. Some issues may be better dealt with by a different agency.

AFTERNOON SESSION

BEST

- Dealing with Great Lakes Initiative & Water programs in the Region.
- EPA stand on Homestead case in Michigan
 - Where the Region has had the flexibility to adapt.
- Every time EPA has issued a post-sanction order to move Illinois along
- Provided support for good use of non-congestion funds.
- Region should scale things down and focus on research, rulemaking & enforcement and work with States on other activities--States are better equipped for some things than Feds.
- Lawsuits and settlements with Northwest Indiana Steel industry.
- Open and frank discussions with Environmental groups about how we can work together.
- Great waters report.
- Attending environmental group meetings.
- Using sanctions to get Northwest Indiana Inspection & Maintenance
- Need better oversight of State programs.
- Need to keep triennial reviews on schedule.
- Willingness of Region to sign unilateral order for Waste, Inc. Site.
- Dredge of sediments in minority community.
- Willingness of senior management to meet with public.
- Need to build public and grass roots support into programs -- fear of increased State capacity because of politics.

- Need to develop benchmarks for measuring progress.
- Miracle of Ken Westlake
- Oak Savannah Conference/initiative
 - People moving beyond job descriptions
- Initiation of Chicago wilderness
- Would like to see State and Federal both work on community-level work.
- Need to find outstanding individuals and empower them to innovate.
- EPA providing more resources for community organizations to do their work -- EJ summit.
- Work with Office of Regional Counsel on reflecting community concerns in Supplemental Environmental Projects (SEP's).
- Greater Chicago Pollution Prevention Alliance.
- U.S. EPA support on Balefill issue.
- Needs to be better oversight of State agencies
- Need to see the Agency not just talking, but taking action.

WORST/SUGGESTIONS FOR IMPROVEMENT

- Moratorium bill in IL on Hazardous Waste Incineration. Superfund capacity assurance process by EPA undercut Environmental Group efforts.
- Too many decisions are made at Headquarters or State level.
- IL non-ctg RACT regulations: U.S. EPA could not define who was/was not complying. [Note: "non-ctg RACT" under the Clean Air Act refers to Reasonable Available Control Technologies for facility categories lacking Control Technology Guidelines.]
- Meetings with stakeholders haven't yielded as much as hoped, because Congress, others restrict EPA's ability to act.
- Lost Grant application.
- Inconsistent answers/responses from different levels of government.
- Outreach must go beyond groups that traditionally deal with environmental issues (e.g., housing groups concerned about lead, asbestos, indoor air, energy efficiency).
- Frustration with Great Lakes National Program Office (GLNPO) on LA Gear (mercury battery problem). Company's response was bogus, "used" EPA. EPA was asked to press company to make their program legitimate, and wasn't responsive.
- Disappointed at initial years of Southeast Chicago initiative.
 - Frequent turnover, no concrete plans or results.
- Because difficult to do community-based work from Regional offices, have other players take a greater role. Get more community buy-in, less "top-down".
- Keep EPA focused primarily on research, rulemaking, enforcement
- Don't have community-based activities draw off substantial resources from core processes.
- Need community input/understanding to make regulatory programs more palatable, build support.
- EPA needs to be more cognizant of the rest of City, work with more non-governmental organizations. Don't just pick a few communities at the expense of other areas.
- Indiana potential EPA program takeback, then deferred to State.
- Better oversight of State programs to ensure they are up to par.
- EPA can do mapping/monitoring/Info sharing/analysis to allow for better targeting and results.
- 1987 Contaminated sediments not acted on because water quality approvals had been poorly documented.
- Failure to apply best available control technology to a power plant scrubber at Northwest Indiana power plant.
- Failure to adequately assess health impacts at Superfund sites. Need more site access controls.
- Inability of EPA to cluster sites for Superfund action.
- Flip answers, unresponsiveness from EPA employees.
- Once opening up to community, don't limit the numbers who can participate.
- Having to finesse who/how to talk to EPA (politics, protocol, lack of coordination/real response).
- Interoffice politics, backstabbing, more concern about who gets credit than with results.
- EPA Staff to grass-roots groups to provide expertise, resources.

FOLLOW UP

- Commitment for meeting notes within three weeks.
- Summary report once four customer sessions are complete.
- Provide notes from other stakeholder meetings to today's participants.

Stakeholder Meeting
Business/Industry
May 20, 1996

MORNING SESSION

- Mission still feels like Command and Control -- Maybe style problem
"We exist to FACILITATE. . . "
- Absence of process -- have core competencies, but not for EPA Regulations.
- What do you feel so strongly about you fund.
- Never say we will become a Total Quality Agency.
- What kind of management organization will ?
- Satisfy customers
 - What do customers want?
 - What do we offer?
- What -- Not stated but assumed
- Assure regulatory compliance
- Past role -- Cop (more PUSH than PULL)
- Want to see more PULL.
- Audit privilege developing in States urges EPA to support State audit laws.
- EPA should recognize industry efforts
- EPA should not demand notice if reporting not required and prompt correction occurs
- EPA should recognize companies doing well
- Incorporate in Enforcement Policy
- Help industry plan 5-10-20 years
- Flexibility (i.e. Permits) needs resource support e.g. external contractors
- Holding meetings between Industry, State(s), and EPA
- Eliminate State and EPA duplication
- Region help with Headquarters issues
 - One of recipients of TSCA subpoena on New River Section 21 Petition; RCRA allegation of maquiladoras-- non-compliance without evidence
- HOW -- Efficiency -- i.e. Superfund settlements --EPA contribute orphan share -- Settle with good faith cost Enforcement vs. Recalcitrant non-settlers
- Curious about how Federal Government chooses community -- why would Federal Government work with community rather than facilitate State involvement.
- Operational Vision -- Felt left out
- Regulated industry not a customer
- Businesses are often at odds with community
- Suggest "solve environmental problems with all affected persons"
- We found helpful Cliff Notes on what words mean
- We see values as boundaries of how we make decisions
- Accountability absent -- people need to be held accountable
- Experience is that there is a difference between what managers and "middle layer" say. Accountability for middle layer.
- Agree with needing more pull, less push
- Feel definition of community including business needs to be strengthened. Some people will miss it.
- How will success be measured?
- Cost-effective solutions -- people don't look at \$\$ as a recourse.
- Streamlining process -- people want a lot of information. People need to define what will be done with information. Creates efficiency/accountability.

- Role of Regional Office -- integrate other agencies. People need to look at how things can be done in a timely fashion.
- Mechanism for community feedback (measurement)
- Commit to continue improvement
- What -- Where is business in defining the priorities
- Part of the problem and part of solution
- Business priorities have to do with sustainability of business
- Should engage others in priority setting.
- See EPA Regional Offices involvement in Interstate issues as good
- Need measurement on how well we're doing at doing business differently
- Measure also defines roles of people in the community
- Agency problem -- Industry will never "love" EPA --EPA has job of identifying Stakeholders and when to include them and when not to.
- Measurement is a struggle, not just what EPA needs but wants
- Priorities International Organization for Standardization (ISO) 14000 priority for business, but don't see it in priorities...open forum to better align public and private organizations.
- Commendable that Agency is going through process of vision and planning.
- Will really help organization point itself in the direction it wants to go, and get there.
- Inability to have regulatory structure to fulfill some of the vision innovations. "How do I enable this to happen?" Will need to create flexibility.
- Identify a mechanism for EPA to "slip out" of enforcement mode to work differently with business and community.
 - Example -- Class V injection wells under Safe Drinking Water Act-- letters went out (?????) 1-2 responses -- Bad data and unwillingness to be identified
- Work at local level to get positive results to programs (especially when large number of small businesses).
- We appear to be saying we facilitate from enforcement position not corrective action position.
- Clean Air Act -- Is system too complex to work with?
- In own company measure is number Notices of Violation/Fines logging time to correct environmental problems as a measure
- Environmental Vision -- sustainable environment. Who is the owner? Ideally, provide powerful tools/infrastructure provided to owners of risk to reduce environmental problems?
- Title 5 of Clean Air Act is worst of all possible scenarios
- Too long a cycle to make competitive changes. Cannot compete with long lag periods before change allowed.
- EPA must follow dictate of Congress. What choice do you have?
- clarify community
- Values -- Region really needs to work on what's said here
- Region/State (game) of whose problem/decision it is. Need to solve!
- Across Regions decisions need to be consistent (level playing field)
- Sees Title 5 (of CAA) permitting as a continuous process for business success -- new Maximum Achievable Control Technology standard jointly developed. It worked.
- Good things from Title 5 (of CAA) forced people to talk to each other within a plant (managers and assembly line).
- Forced to talk to regulators more.
- Will be most inflexible operating situation ever.
- Complexity is an issue. There all the time.
- Example where to site a new facility. Meld OSHA (Occupational Safety and Health Administration) and Clean Air Act section 112 (R). Focus on what ultimate outcome is and we can get there cheaper/faster/easier.
- Complexity very real. Yorktown study would get same results for \$10M instead of \$40M.
- Expansion is based on permits --CAA Title 5 cannot get permits out fast enough.
- Are groups within Agency which find out how to slip when involved in collaborative activities. Message is that should not have been involved in collaborative efforts.
- Accountability needed within Agency.
- Asking Agency to invent process to get past complexity. Need to find way to circumvent complexity.
- Region + Process (Headquarters/Regions/States) adds to complexity (model CAA Title 5 meeting in Puerto Rico)

- Process -- simplify forms
- Forms/Databases should be so simple. It is easy to report and match to community values.
- Private sector role to complete reports and put in Agency databases.

AFTERNOON SESSION

BEST

- Steve Rothblatt & Clean Air Partners Asthmatics
- Superfund remedial investigation of landfill -- timely response
- Effective treating Tribes as States
- Good relationship with Agency -- Asking Region 5 for priorities
- Asking EPA to speak to company
- Ambassador Program -- Superfund, Brownfields Program in Illinois
- Listened well (Superfund section 106 order)
- Negotiating Clean Water Act and Resource Conservation and Recovery Act Consent Order -- NEIC
- Industrial Technical Assistance was good--Very professional conduct by EPA.
- Good give and take on both sides.
- EPA doing outreach on Regulations
- This meeting good experience
- Delegate programs to States so we don't have to deal with US EPA.
- Rulemaking
- Process input
- Dialogue to define solution
- Toxic Substances Control Act (TSCA) problem solved on permit
- Communication and Flexibility
- Good work with Illinois EPA
- Good inspectors -- Technically competent; train others as needed.
- Is compliance assistance helping to improve compliance rate?
- Asbestos Project on track in timely (14 day) fashion.
- At our best when not around -- let States do job.
- Always available when industry wants to talk.
- New Source Performance Standards (NSPS) and other Prevention of Significant Deterioration (PSD) air programs.
- How will we incorporate our 5-year Midwest Strategy Plan with output of this process -- Share with participants.

WORST/SUGGESTIONS FOR IMPROVEMENT

- Do more meetings like today.
- Tech. People should be more open to new technology.
- SF clearing-house on technology.
- More Total Quality Management training for Superfund remedial program managers.
- Lower turnover of staff
- Be open re: Priorities
- On key projects, have more senior involvement of Federal/State management.
- Convey message to EPA Headquarters regarding RCRA (Resource Conservation and Recovery Act) Maximum Achievable Control Technology
- Follow-up meeting one year from now
- Regional/State/Industry meeting on specific topics i.e. IEPA chamber meetings
- Be more user friendly
- Total Quality concept -- develop stronger program with industry -- make them accountable
- Make States accountable
- Simplify process.
- Have informational meeting (non-confrontational)

- Work through Trade Association to present information.
 - International Organization for Standardization (ISO) 14000 should be #1 approach for EPA
 - EPA should be guide, educator, philosopher.
 - Flexibility
 - Action should match idea
 - Communication important.
 - One stop shopping on phone calls.
 - Be responsible for making initial success
 - Full voluntary progress
 - If outreach/compliance assistance achieves results without enforcement, take credit.
 - More EPA training of own staff.
 - Focus on environmental improvement, not punitive actions.
 - Give innovative programs support.
 - Urged EPA to embrace International Organization for Standardization (ISO) 14000.
 - Be open to participate & dialogue (Don't snub request to participate).
 - Timely resolution of problems/violations.
 - Informal process for dispute, resolution(State Agency) & EPA together with industry.
 - Communicate results to States
 - Get EPA & State in alignment.
 - EPA should be open to new information, new approaches.
 - Don't kill innovation by making process so difficult that almost no one can qualify.
 - Lack of trust
 - Need ability to make things simpler rather than planning for every contingency.
 - Single point of contact to get answers.
 - Commit to make innovations work. Give volunteers a reason to do so. Learn from experiences.
 - Flexibility
 - Figure out how to bring process together
 - Develop strategy
 - Share 5-year strategy with business
 - Continue these types of meetings
 - Ensure follow-up
 - Need working level interaction.
 - Better advice to States.

 - Communicate State/Region/Industry
 - EPA Staff -- Be civil & well informed.
 - Keep communication simple & consistent
 - EPA develops internal policies (without benefit of statute/rulemaking.) Need to make policy-development process more open to stakeholder input.
 - Look for ways that innovation can occur, not reasons not to.
 - Don't hesitate to call to clarify.
 - Do more meetings like today
 - Technical people should be more open to new technology.
 - Be more flexible -- Be truly open to innovation
 - Remind Staff of ultimate goal; Goal - How things can be done.
 - Communication
 - Look for ways that innovation can occur, not reasons not to. - Don't hesitate to call to clarify.
 - Memorandum of Understanding on Brownfields with each State on voluntary cleanup.
 - Enforcement case on RCRA (Recourse Conservation and Recovery Act) Boilers & Industrial Furnaces; saw no environmental harm, extensive case concluded with satisfactory outcome, but shouldn't have occurred.
 - Air; Ft. Howard boiler has been reviewed for 20 years.
- Ft. Howard area-wide Clean Air Act State Implementation Plan establishment. Once attitudes hardened, communication stopped.

- Sediments; EPA not flexible..Unrealistic risk scenarios
- Superfund Record of Decision management wasteful
- Quality Assurance/Quality Control
- Superfund Enforcement
- Sediment remediation requires too many permits, too many participants.
- Leadership need to be more involved to establish goals
- Superfund case dragged on 12 years
- Urged carve out for settlers, get tough on non-settlers.
- Mass mailing on maquiladores (Mexican border factories) non-compliance without getting evidence first.
- Having to pay attorneys to contact EPA, in desire to ask questions anonymously.
- How to get Superfund scoring data. Very unresponsive timing.
- Lake Michigan water study, potential to translate to other basins.
- Ozone Transport Assessment Group is pushing consistency in different areas, despite different risks?
- Snubbed by EPA to participate in training/informational seminars, despite EPA promises to attend.
- Being told "You can't do it that way", without viable options offered
- Many information requests over 5-year period without issuance of complaint or negotiations.
- State Inspector holding Huge abandoned industrial site to same practices as an occupied specified approach.
- Suggest forum for resolving State dispute without legions of attorneys.
- Concern over State/Federal inconsistency.
- 3 months shutdown because contamination wasn't documented/acted upon quickly (too much time-consuming paperwork)
- Too much reporting (costs time/\$ to generate, is it really needed?) e.g., Clean Air Act Title 5 Data
- Multi-media inspection is nightmare. Plant staff overwhelmed
- 2-year dialog ensues.
- Too much paperwork without adequate basis.
- Agree with/1 Division & couldn't solve problems with other Division.
- Import violation that based on confusion of where compliance reported Headquarters vs. Region.
- New Source Performance Standards (NSPS) industrial boiler Enforcement case in early 80's
- Flexibility. Make it real!
- How to take this input, turn it into strategy that EPA/States/others implement.
- Industry need to understand EPA's direction so they can be pro-active.
- Need these meetings to be at least yearly and have interactive dialogue, and implementation.
- States hesitant to innovate, worried about EPA reaction.
- State/Region couldn't make Best Available Control Technology Determination under Clean Air Act---Delay.
- Compliance demonstration led to very unpleasant, rude litigation. Attorney unable to articulate rationale. Never resolved, pending for years.
- Wants courtesy call/heads-up before inquiry turns into order with press release.
- Rude, ill-informed, abrasive attorney at EPA.
- Notifiers can become TARGETS.
- How to identify/bring into compliance those who don't notify, remain underground?
- Make rules more usable, understandable to reduce incentives to avoid regulatory framework.
- Difficult consistent messages throughout organizations.
- EPA failing to act consistently. Don't let staff be a roadblock. Escalate issues to reflect management vision.

Stakeholder Meeting
Small Business
May 31, 1996

Observations

- EPA should realize culture and importance of small business
- EPA perceived with fear
- EPA perceived putting them out of business
- Not here to put out of business, but to help
- EPA doesn't directly communicate until trouble
- Need pro-active communication with small business
- Offer technical assistance on alternatives, not just enforcement
- Most small business wants to do right things; wants help, not reprisals
- Improve EPA/small business communication
- Leaking Underground Storage Tank (LUST) program major issue for petroleum marketers
- Fear that EPA will put people out of business; local governments have same concerns, "big hammer"
- Most business people concerned about environment, but fear cleanups that would otherwise occur
- Public review of community based plans
- Issues develop when residences follow business
- International Organization for Standardization (ISO) 14000 -- will we have our own standards or use ISO 14000?
- EPA supports environmental management/information systems for business
- Supports technical assistance especially on pollution prevention
- Business relates more directly with states. Why should states have to get federal approval (e.g., IL amnesty program). Note: EPA was asked, but declined to endorse, but Federal approval not needed
- Urge good public education without heavy threat of fines
- Concern that 80% of cleanup costs go to lawyers
- Had to bring suit to get de minimis settlement at superfund site. Had to make financial disclosure. Process was very intimidating
- Address the superfund ratio = \$ to lawyers: \$ to cleanup, Now:80 : 20; Ideal:20 : 80
- Change culture; Start in schools, focus on improvements over time, define rules more precisely; work more closely with folks doing clean-up
- There are issues with bureaucracies
- Figure out priorities
- Stop/prevent pollution
- Look for better, cheaper ways
- How are EPA standards set?
- Understand natural processes relations with pollutants
- Be reasonable in standard setting
- U.S. EPA dictates to Illinois EPA, Metropolitan Water Reclamation District to business
- Irritation that big government doesn't understand how small business works
- Especially critical time impacts on business
- Laws are so difficult to understand, have to hire people to understand, Why can't government help figure it out?
- Huge time delays in permits for simple things. Pure red tape. Silly things: need all day seminar, 2 or 3 times a year to explain what needs to be done
- Common-sense outreach needed to educate business on how to do right thing quickly without time-consuming red tape
- Competitive pressures drive business timing
- Need more emphasis on training/education, so that small business doesn't have to rely so heavily on consultants, attorneys
- Make EPA staff more accessible to answer questions, provide timely service
- Businesses want to comply, but in practical, reasonable, timely ways

- EPA perceived as “rule quoter”
- International Organization for Standardization (ISO) 14000 policy - goes to suppliers
- Are policies based on current technologies or future technologies?
- Clean Air Act Title 5 issues rely on futuristic technologies
- Concerns over paperwork, proofs needed for reclamation
- EPA used to specify technology, shifting to environmental results, with flexibility on how these standards are achieved
- New plants should drive/use up-to-date approaches
- Difficult for industry, especially small firms, to react to costly shifts in requirements
- Better EPA outreach will give business more lead time to react.
- Superfund liability has driven many small firms out of business.
- Small firms can't afford outside experts.
- Government representatives don't know about their industry. Need more industry specific information.
- Communicate! Go to their town---grassroots; there are 1000's of companies who want to work with you, but don't know how; make things understandable.
- Fear of EPA. Call for meeting surprised by “yes” reply. This company is involved; most fear...
- Why does it take so long to get rid of bad players? Even after conviction, they often stay in business.
- Concerned with getting bounced around EPA to have questions answered.
- Asbestos flooring removal generates more chemical hazardousness than mechanical methods.
- Got the run-around and mis-information. That cost the firm money and generated safety problems. Regulatory barriers to use of new technology.
- EPA: example of needing performance based (such a system of distrust)
- EPA: cultural problems with change.
- We are here as friends, but even here all have problems.
- EPA: this is very positive for us to hear; Superfund potentially responsible parties (PRP) big problem
- Q: on standards for underground storage tanks. EPA will check.
- Renovation of tank farm -- expensive planning & \$\$.
- Education is key to business handling chemicals safely.
- Extensive state/local oversight of tank installation & remediation.
- Firm benefitted from attending seminars, keeping current on technical/regulatory developments.
- How to get information to large number of firms in timely fashion?
- EPA will provide list of free software for variety of environmental issues.
- Software to Small Business Administration & state association
- Idea-anonymous hotline for problems. Example: problem--Illinois EPA came, kept the project going.
- National Association of Chemical Distributors; problem solves: has fact sheets, etc.

EPA/Stakeholder Meeting
Local Governments
June 21, 1996

- Inability to communicate EPA priorities to local community level
- Too much top- down identification of problems with solutions being directed to locals
- Customer service message being lost in translation through IEPA
- IEPA/EPA/Local = needs to be better partnership
- IEPA rapid response on Brownfields sites working well
- Approach everything with team concept, with shorter response times, more genuine listening/engagement
- EPA discussed performance partnership agreement to redefine roles/expectations
- How has EPA built partnerships, especially with smaller municipalities
- Local governments fear seeking compliance assistance out of fear of enforcement
- IEPA clean break small business amnesty seen as mechanism for compliance assistance
- Provide small business self audit policies
- Local air agencies concerned about impacts of performance partnerships
- Concern that when agreements made with one level of government, others don't/won't honor (Illinois tanks program is example)
- Funds come as a "Demonstration" and not transferable
- Environmental software available from EPA (including via Internet)
- Provide lists of software to attendees
- Need to share more national work products with locals
- Increasingly local government contacts are with States, little with Feds
- EPA trying to share workload, less hierarchical, less duplication
- EPA publications high quality
- Planning - Focus on having local government involved in planning process (EPA involved in local government planning)
- S.E. Wisconsin - Urban Sprawl/Land use in largest problem
- EPA should find ways to support solid land use planning
- Urban sprawl -- explain connections to Environmental issues; "Inform the debate".
- EPA information often so technical that it doesn't reach, inform, or impact local decision-makers or general public
- Tailor information in understandable/accessible ways
- Talk via existing organizations (e.g. Northwest Municipal Conference, Illinois Municipal League)
- Local governments want to have quality of life, but need understanding & practical tools. Why are certain programs/practices needed?
- Present alternatives and explain why it is important to achieve results
- EPA's goals/local government goals need to be understood by each other
- EPA should be wary of being "used" by factions of local government--be cautious
- West Central Municipal Conference Brownfields Grant has worked to improve trust
- EPA outreach facilitates all parties involvement in problem identification and solution
- Provide environment for problem identification and solution and avoid a adversarial environment of court
- Best: Interaction with EPA personnel (e.g., Klevs, Sipe)
- Best: Involvement in Chicago biodiversity project (catalyst, expertise, networking)
- Best: Staff who are risk-takers/innovators. Those who aren't (e.g. by-the-book staff) are detriment
- Best: EPA plan involvement with local/State on Chiwaukee Prairie preservation resolved problems, had environmental benefit
- Best: Brownfield Team. Mind set of assistance-providers
- Brownfields -- supports creativity (start may have internal struggle among EPA staff)
- Timely and appropriate response by Agency Staff has changed from '87->'95. Improved greatly in '95
- Pretreatment technical assistance and information dissemination has improved greatly
- Internal Agency issues get in the way of working well together: Headquarters vs. Region, etc.
- Will EPA stay committed to community-based? Will EPA's culture change with administrations or will new approaches survive/permeate organization?

-
- EPA reply: Feels customer focus culture will endure. Size isn't as critical as effectiveness
 - Important to simplify/clarify our publications and communications tools (e.g. Small-Quantity Generator, Leaking Underground Storage Tanks brochures excellent)
 - Explain what is needed and why. Be more pro-active disseminating these
 - EPA needs to address local groups and associations in clear fashion. Use these forums routinely
 - Region 5/State communication needs to filter down to local government -- clarify regulation interpretations
 - Need to plan for new rules sooner/better
 - Local customer service with Dave Kee (Region 5 Air and Radiation Division) great!
 - We no longer confuse announcement with discussion
 - Agency not always informed about existing environmental situation
 - How well does EPA understand a specific environmental problem? Need more sharing of relevant information across levels of government
 - Region often fails to see flexibility intended by Headquarters regulation writers
 - Failure to examine issues holistically/cross-media. One EPA program undercutting credibility of another program (example: Water standards not understood by Air program)
 - State filtering of Federal Policy. Understanding/options lost in transition
 - Direct implementation of Wetland Advanced Identification filled gaps of State role with locals
 - Do Better: Visit the customers once in awhile
 - Waukegan Harbor cleanup better off on balance since this occurred; landfill answers need to come soon
 - Waukegan Mayors Fishing Derby -- You can now eat the salmon

Appendix F

September 24 Draft
CUSTOMER SERVICE STANDARDS
of
THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

EPA's Universal Standards represent the overarching *goals* of the Agency for its customer service performance. The Universal Standards are for all employees use in serving all external and internal customers. An EPA organization may set its own customized standards which may be more rigorous.

UNIVERSAL CUSTOMER SERVICE STANDARDS

In carrying out our mission to protect public health and the environment,

1. We will be courteous, professional, flexible, honest, and helpful in all dealings with our customers. We will actively listen so we can better understand what motivates our customers and how we can best provide the environmental products, services and information they value, and be fully responsive to customer concerns and needs regarding our services.
2. We will answer all telephone calls promptly, and will respond to them by close of the next business day. If the person receiving the call cannot fully respond to the inquiry, the customer will be accurately referred to someone who can.
3. We will respond to all correspondence within 10 working days of receipt. If we cannot provide a complete reply within 10 working days, we will contact the customer as soon as possible within the 10 day period to acknowledge and clarify their request, discuss what is required to provide a full response, and determine when they will receive a full response.
4. We will provide our customers with clear, easy to understand, timely, and accurate information about products, services, policies and procedures. We will ensure that customers have easy access to information, available through convenient channels, and in various formats.
5. Relationships with our co-implementors of environmental programs, the State, Tribal and local governments, and other Federal agencies, will be characterized by partnership, flexibility, and assistance that empowers them to expand their ability to deliver environmental protection.
6. We will seek customer input to inform our decisions on policies, programs, and rules.

The groups of standards below apply specifically to each of the eight Core Processes which provide products and services to Agency customers.

PUBLIC ACCESS STANDARDS

These standards apply to requests for general information from the public. They do not apply where legal requirements take precedence, such as Freedom of Information Act inquiries. They are in addition to the universal standards and amplify them as they apply to working with the general public.

1. We will strive to make information available through a variety of channels, including electronic media and intermediaries, such as, community organizations and local libraries.

2. We will hold ourselves accountable for a satisfactory response by providing mechanisms (contact names and telephone numbers or e-mail addresses) for reporting back on the quality of our responses and referrals.
3. If you write to us (via mail, fax or computer):
 - We will mail a response within ten business days of receipt. If we need more time to research the answer, we will contact you within those ten days to tell you when to expect our response and who the contact person is.
4. If you telephone us:
 - We will provide an Agency-wide public information telephone line, which will help route inquiries.
 - We will answer the call promptly and courteously.
 - We will make every effort to answer questions immediately. Where that is not possible, we will provide a timetable for responding during the initial conversation.
5. If you contact us via computer:
 - We will provide a single address for connection to all EPA resources on the Internet [<http://www.epa.gov>].
 - We will provide descriptions, including source and known quality, of data made available electronically.

RESEARCH GRANTS STANDARDS

The following standards amplify and expand the universal standards, applying them to the research grants process:

1. When issuing requests for proposals to all interested parties, we will include a tentative timetable for activities in the selection process, so that applicants will know when they may learn if their proposal is selected for funding.
2. We will acknowledge receipt of proposals and applications within 15 working days from the cut-off date for receipt. The acknowledgment will include a unique identification number for each proposal and application so that applicants and agency personnel can more efficiently track their status.
3. The grants management office will conduct the administrative and legal reviews required for a proper award and issue the award of assistance agreements within 60 days from having received a complete request for funding from the research organization.
4. For active grants, the grants management office will process requests for administrative amendments to grants and issue the amendments within four weeks of the receipt of complete requests forwarded by the research organization.

PESTICIDE REGISTRATION STANDARDS

The standards following apply specifically to the pesticide registration process and should be used in conjunction with the universal standards. They are still undergoing review by customers and staff, and will be revised in the near future.

1. We will answer telephone calls within 24 hours of receipt, when possible. If the person receiving the call cannot fully respond to the inquiry, the customer will be forwarded to someone who can.
2. We will work to answer all correspondence within 10 working days of receipt. However, if our customers have raised questions which require extensive research to answer, it may take us longer. If we cannot provide a complete reply promptly, we will contact the customer within the 10-day period to explain why and when they may expect a full response.
3. We will seek opportunities to involve all affected stakeholders prior to our major regulatory or policy decisions.
4. We will provide clear and accurate information about the policies and procedures for pesticide registrations and reregistrations.
5. We will process applications and complete evaluations as promptly and as efficiently as possible without compromising either scientific quality or health and safety considerations.
6. We will ensure that we meet our statutory responsibilities to provide customers with easy access to all available information on pesticides.
7. We will proactively involve States, Tribes, and EPA Regions prior to establishing major policies or making major regulatory decisions affecting them.
8. We will undertake periodic surveys to find out what our customers think of our services and how we could make further improvements.

PERMITTING STANDARDS

In addition to the universal standards, the following four standards apply to this process:

For our three major customer groups (the general public, the regulated community and delegated State, Tribal, and local programs):

1. We will prepare permits that are clear, fair, appropriate, and effective.
2. Our staff will be knowledgeable, responsive, cooperative, and available.
3. We will work with representatives of delegated programs to continually improve our delegation processes, so that they are as efficient, effective, and nonburdensome as possible.
4. For the regulated community, we will make our permit decision within the time frame that is established for the type of permit being requested.

PARTNERSHIP PROGRAMS STANDARDS

The following standards amplify the universal standards and provide additional goals for this process:

1. We will always treat our customers with professional courtesy and respect.
2. We will proactively provide our customers accurate, up-to-date, and reliable information, products, and services, including high quality documents and publications.
3. We will actively listen to our customers' concerns and needs regarding our services and will develop technical assistance services, where possible, designed to address those needs and concerns.
4. We will ensure that inquiries will be referred to the right office and individual in EPA, or beyond EPA, if appropriate. We will encourage customers to report back on unsuccessful referrals.
5. We will respond as expeditiously as possible to inquiries for information.
6. We will strive to make information available through various channels, including electronic media, faxes, and intermediaries such as state assistance organizations, trade associations, and state agencies.
7. We will recognize and publicly acknowledge the accomplishments of our customers who achieve success in voluntary programs.
8. We will make every effort to streamline and make customer reporting requirements as practical and least burdensome as possible.

STATE, TRIBAL, AND LOCAL PROGRAM GRANTS STANDARDS

The Program Grants Core Process standards were distributed to customers in July 1996 with a questionnaire recently approved by OMB. Changes to the standards will be based on customer feedback as well as comments from EPA staff.

1. We will reduce the amount of grant paperwork by 25% through such activities as consolidation of application and reporting requirements, electronic transfer, and multi-year grant work programs.
2. We will acknowledge receipt of all grant applications within 10 working days.
3. For established grant programs, we will award grants funds within 90 days after receipt of a complete grant application (provided that the responsible EPA office has received funding authorization).
4. We will consult, in a timely manner, with states, tribes, and localities throughout the development of all major grants guidance and policy documents.

ENFORCEMENT INSPECTIONS AND COMPLIANCE ASSISTANCE STANDARDS

The following standards apply in addition to the universal standards:

Compliance Assistance Field Representatives:

1. Requests for field assistance will be provided in a timely manner, taking resource constraints and expertise into consideration. Where assistance cannot be provided by the Agency, accurate referrals to other Federal, State or local agencies; private organizations; or educational institutions will be provided as appropriate.
2. Field representatives will be technically knowledgeable, understand the Federal regulatory requirements and Agency compliance and enforcement policies that apply to the facility, and be courteous and professional.

Compliance Inspectors:

3. Inspectors will make clear who he or she represents and the purpose of the visit.
4. Inspectors will be technically knowledgeable; understand the Federal regulatory requirements and Agency compliance and enforcement policies that apply to the facility, and be courteous and professional.

Compliance Assistance Tools:

5. In developing compliance assistance tools, the Office of Enforcement and Compliance Assurance will:
 - o Develop tools responsive to the needs and concerns raised by all interested stakeholders.
 - o Seek opportunities to involve all interested stakeholders in the development of compliance assistance tools.
 - o Strive to make information available through a variety of channels, including electronic media and intermediaries (e.g., trade associations, state assistance organizations, state agencies, and community organizations)

Compliance Assistance Centers

6. All Compliance Assistance Centers will be operated consistent with the universal and public access standards, and any additional standards established for individual centers.

Enforcement

7. In all enforcement actions, the Office of Enforcement and Compliance Assurance will be legally and technically knowledgeable, courteous and professional, and will work to resolve issues as expeditiously as possible.

RULEMAKING STANDARDS

In addition to the universal standards, the following standards apply to rulemaking:

1. We will ensure that customers have input into the rule development process by conducting public forums, or using electronic media or other forms of communication.
2. We will write rules so they can be understood by the people who use and implement them. Rules will be tailored to the legal and technical knowledge and resources available to those affected.
3. We will include, in the preamble of all Federal Register notices accompanying a proposed or final rule, a plain English explanation summarizing the problem the rule is trying to solve, a summary of what the rule requires, and a short explanation of how the rule solves the problem.
4. We will work to ensure that all members of the regulated community know what is expected of them. To the extent possible, we will work with trade association, the press and others to notify all known parties who must comply with the rule through written or electronic media.