



Performance Track Regulatory and Administrative Benefits

Membership in Performance Track provides you with regulatory and administrative benefits. EPA has established the policy to recognize facilities with strong environmental performance and commitments to go beyond regulatory requirements. In addition to the recognition, marketing the regulatory and administrative benefits that Performance Track offers to key decision-makers within your facility and company should help you build the consensus you need to apply for Performance Track. Currently, there are several federal benefits in place, and others in various stages of development. Cooperation with state agencies is often required in order to successfully deliver these benefits to program members. In addition, some states may offer benefits to Performance Track members beyond what is offered at the federal level. To view additional information on regulatory and administrative benefits, you can visit www.epa.gov/performancetrack/benefits/regadmin.htm . If you have any questions about specific benefits, please call the Performance Track hotline at 1-888-339-PTRK (1-888-339 7875).

The following is a summary of benefits already implemented by EPA:

The benefits available now are reduced reporting frequency for minor air sources, flexible air permits, an expedited NPDES permit renewal process, more favorable terms for Clean Water State Revolving Fund loans, facilitating existing NPDES permitting flexibilities, reduced self-inspections for certain hazardous waste facilities, an extended accumulation time for large quantity generators of hazardous waste, a low priority for routine federal EPA inspections, and Green Suppliers review discounts.

Air Benefits

- Reduced Reporting Frequency for Minor Air Sources—This provision reduces the frequency of reports required under the Maximum Achievable Control Technology (MACT) provisions of the Clean Air Act such that semi-annual reports may be submitted annually. The rule also allows for submitting an annual certification in lieu of an annual report in certain circumstances. More information is available in the EPA fact sheet (see www.epa.gov/performancetrack/downloads/MACT_IncentiveFS.pdf).
- Flexible Permits— EPA has promulgated revisions to the Title V and New Source Review programs under the Clean Air Act. The revisions make more broadly available a new approach to air permitting known as a "flexible air permit (FAP)." [NOTE: EPA is in the process of reviewing several agency decisions made prior to January 20, 2009, including the Flexible Air Permit rule. As of February 4, 2009, this rule is still under review and not yet effective.] The flexible permits typically include provisions that approve certain types of changes that would otherwise require a major permit modification. Facilities with flexible permits have the ability to make pre-approved changes without amending their Title V air permit. As a component of the implementation plan for the final FAP rule, EPA will provide technical assistance to Performance Track members seeking FAPs. A copy of the final rule and a fact sheet on flexible permitting can be found at EPA's [New Source Review Regulations and Standards](#) page.

Water Benefits

- Expedited NPDES Permit Reviews—Performance Track staff work with EPA's Office of Water to expedite the review of National Pollutant Discharge Elimination System (NPDES) permit renewal applications held by Performance Track members. Performance Track contacts members whose NPDES permits are expiring in the near future to discuss opportunities for an expedited permit renewal application review.
- Clean Water State Revolving Fund Program—EPA encourages states to provide more favorable terms to Performance Track facilities in their Clean Water State Revolving Fund (CWSRF) programs. CWSRF programs use a combination of federal and state contributions to make low interest loans to interested parties for a variety of water quality projects dealing with municipal wastewater treatment projects, non-point sources, watershed protection or restoration, and estuary management. The incoming loan repayments are “recycled” into new loan disbursements for other water-related projects. The CWSRF loans can help Performance Track facilities meet their environmental goals and, at the same time, help state and local governments address their environmental priorities. The support also could encourage facilities to increase their community involvement, perhaps helping to link facilities with watershed groups. Working with Performance Track facilities also allows states to support activities that are beyond regulatory requirements. More information is available in the EPA fact sheet (see <http://www.epa.gov/owm/cwfinance/cwsrf/performancetrack.pdf>).

Facilitating Existing Flexibilities—The Performance Track program has been working with several Performance Track members and their states to facilitate the use of existing NPDES permitting flexibilities. These flexibilities include one or some combination of the following -- coordinated or balanced effluent and ambient monitoring, reduced effluent monitoring frequencies, reduced reporting frequencies, expedited review of a facility's NPDES permit, and single point of contact in state and Region.

Waste Benefits

- Less Frequent Self-inspections for Performance Track Facilities—This regulation provides Performance Track Resource Conservation and Recovery Act (RCRA) facilities the opportunity to reduce self-inspections of certain types of hazardous waste units from daily or weekly to monthly. A facility must receive advance approval from the authorized state to reduce self-inspection frequency requirements. More information is available in the EPA Fact Sheet (see http://www.epa.gov/performancetrack/downloads/RCRA_IncentiveRedSelfInspFS.pdf).
- Extended Hazardous Waste Accumulation Time—This regulation allows large quantity generators of hazardous waste who are Performance Track members up to 180 days, and in some cases 270 days, to accumulate their hazardous waste without a RCRA permit or interim status. Facilities must gain prior approval of the EPA Region and authorized State as well as comply with additional reporting requirements in order to take advantage of this incentive. More information is available in the EPA Fact Sheet (see http://www.epa.gov/performancetrack/downloads/RCRA_IncentiveExtendedStorageFS.pdf).

Other Federal Benefits

- Low Priority for Routine Compliance Inspections—Generally, the priority for routine EPA compliance inspections at Performance Track facilities is lower relative to non-member facilities; however, this policy is optional for state and local enforcement authorities.
- Green Suppliers Review Discounts— Regardless of the manufacturing sector in which it operates, a Performance Track facility and its suppliers are now eligible for a Green Suppliers Network (GSN) Review. The Green Suppliers Review is conducted at the facility and is tailored to fit the facility’s manufacturing process. These reviews normally cost \$7,000 and entitle the facility to five non-consecutive days of on-site technical assistance using lean and clean manufacturing techniques to enhance the performance of one process line, and a final report outlining the opportunities for improvement. Through a Performance Track partnership with GSN, a limited number of Performance Track facilities can obtain a GSN review at the reduced rate of \$4,500 for facilities with 500 or more employees and \$2,500 per facility if it has less than 500 employees.

To date, Green Suppliers Reviews have identified almost \$10 million in annual cost savings for 20 suppliers. By reviewing one facility process line and training employees to apply the same techniques throughout the facility, the Green Suppliers Review Team has helped suppliers to identify numerous opportunities to improve their environmental and economic performance, often achieving at least a 3-to-1 return on their investment. For further information about GSN, see

<http://www.epa.gov/performance-track/benefits/PTGSNservice.htm> .

- DOE Assistance Available for Facility Energy Assessment—Through its "Save Energy Now" initiative, the U.S. Department of Energy's Industrial Technologies Program helps industrial plants operate more efficiently and profitably by identifying ways to reduce energy use in key industrial process systems. As a key element of Save Energy Now, DOE conducts no-cost plant energy assessments to help manufacturing facilities identify immediate opportunities to save energy and money, primarily by focusing on energy-intensive systems, including process heating, steam, pumps, fans, and compressed air. If you're interested in learning more, please visit the Save Energy Now website at <http://www1.eere.energy.gov/industry/saveenergynow/assessments.html> .

Other State-related Benefits

EPA's Performance Track program is working with state partners to streamline state program application and reporting processes, alleviate regulatory and administrative burdens placed on members (without compromising environmental protection), and develop and deliver meaningful facility-specific benefits that encourage higher levels of performance.