

Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
Alabama DEM. Sources: Tad Moss, Office of Education and Outreach; Alabama survey instrument						
AL	# of permit application packages that included P2 fact sheets	Permitting	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of permits with P2 conditions	Permitting	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of permitting programs that discuss voluntary P2 measures during the application process	Permitting	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of permitting programs that include standard P2 language in routine permit calls, letters, renewal notices, etc.	Permitting	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of permitting programs that assist parties in identifying P2 opportunities before applications are submitted	Permitting	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of permitting programs encouraging facilities to implement P2 in order to avoid the need for permits	Permitting	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of permitting programs that offer permit incentives for adopting voluntary P2 measures	Permitting	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	

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AL	# of inspection programs that note observation or discussion of voluntary P2 activities on inspection reports	Inspections	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of enforcement programs that discuss P2 options in SEP negotiations	Enforcement	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of P2 SEPs issued	Enforcement	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of SEPs that include P2 as a percent of all SEPs	Enforcement	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of programs that promote P2 as the preferred method for bringing in operation back into compliance	Compliance/ Enforcement	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of programs that extend compliance schedules for facilities committing to implement P2 projects	Compliance/ Enforcement	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	Enforcement documents that include standard P2 language	Enforcement	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of programs in which P2 or a waste audit has been included as part of a compliance agreements	Compliance/ Enforcement	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	Results of Orders/Judgments that included P2	Compliance/ Enforcement	Outcome-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	

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AL	Amount of pollution reduced as results of Orders/Judgments that included P2	Compliance/ Enforcement	Outcome-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	No unit or calculation method specified in survey.
AL	# of employees in each program trained in P2	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of employees in each program that attended P2 workshops, seminars, or conferences last year	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of employees per program that participate in professional association P2 workgroups or have attended association meeting sessions on P2	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of employees per program that distributed P2 informational materials	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of programs that regularly participate in the DEM's P2Net	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	Meetings or seminars at which programs were represented, that included P2 as an agenda item or topic	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	P2 groups in which programs participate	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	

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AL	P2 activities or goals that have been set forth by programs	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	Programs that have funding for P2 activities accounted for in their grants	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	Programs for which employee tasks and responsibilities include P2	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey also asks for examples of tasks and activities.
AL	Programs that use other administrative mechanisms to encourage P2	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey also asks for examples of these mechanisms.
AL	Programs that consider P2 opportunities when writing, reviewing, and/or commenting on proposed regulations	Rulemaking	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey also asks for examples.
AL	Programs that documents P2 assistance provided to industry.	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	Frequency and method/type of P2 assistance given by programs	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	Programs that promote EPA, state, and other voluntary P2 programs	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	Programs that provide information on waste exchanges	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey also asks for examples of the waste exchanges.

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AL	Programs that developed and/or distributed P2 materials	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey asks programs to list the specific materials.
AL	Programs that promoted P2 in presentations	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey asks programs to list the presentations
AL	# of general displays in which programs included P2	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of employees that participated in training, workshops, or conferences regarding P2	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey also asks how employees are encouraged to attend training, workshops, or conferences.
AL	Programs that acknowledge P2 projects implemented in facilities	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey asks for explanation of such activity.
AL	Programs that encourage submittal of articles on successful implementation of P2 in journals or newsletters	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of P2 articles submitted by programs	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	# of P2 articles by programs printed	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	
AL	Programs that encouraged or participated in nominating or judging applications for P2 awards in the past year	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey asks for explanation of activities.

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AL	Data sources that programs use to track pollution prevention activities	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey asks programs to list data sources, such as information gathered from standard applications or forms, references to P2 in communications, comparisons of data collected to national or state goals or target classifications/indices, etc.
AL	Programs that report on P2 activities in other fora	General	Activity-based	Current	Survey of all DEM programs and branches recently conducted by P2 staff.	Survey asks programs to indicate the fora in which they report P2 activities, such as grant reports, association meetings, staff meetings, etc. Survey also request the frequency of reporting.
Illinois EPA P2 Office. Source: Becky Lockart.						
IL	# and type of P2 suggestions made by inspectors	Inspections	Activity-based	Current	All bureau inspectors are required to submit a P2 Summary Feedback Form to the Office of Pollution Prevention, but the Office does not get 100 % returned.	The office uses this information to improve assistance/training programs, and to go on site visits with inspectors that give the same suggestions repeatedly and who may need new ideas.
IL	# of inspections with P2 suggestions made	Inspections	Activity-based	Current	All bureau inspectors are required to submit a P2 Summary Feedback Form to the Office of Pollution Prevention, but the Office does not get 100 % returned.	The office uses this information to improve assistance/training programs, and to go on site visits with inspectors that give the same suggestions repeatedly and who may need new ideas.
IL	# of inspections with referrals for P2 technical assistance from OPP or WMRC	Inspections	Activity-based	Current	All bureau inspectors are required to submit a P2 Summary Feedback Form to the Office of Pollution Prevention, but the Office does not get 100 % returned.	The office uses this information to improve assistance/training programs, and to go on site visits with inspectors that give the same suggestions repeatedly and who may need new ideas.
IL	# of suggestions per inspection	Inspections	Activity-based	Current	All bureau inspectors are required to submit a P2 Summary Feedback Form to the Office of Pollution Prevention, but the Office does not get 100 % returned.	The office uses this information to improve assistance/training programs, and to go on site visits with inspectors that give the same suggestions repeatedly and who may need new ideas.
IL	# and type of P2 suggestions implemented at facilities	Inspections	Activity-based	Current	OPP contacts facilities six months to a year after the visit. OPP now uses a survey form to collect that information, after finding that phone calls were inefficient/ineffective. Response for the survey form is approximately 25 percent.	
IL	Environmental and financial benefit of P2 assistance provided during inspections visits	Inspections	Outcome-based	Upcoming (pilot project is currently active; measurement to follow)	P2 staff will contact facilities 6 months after assistance is provided, to estimate environmental and financial benefit. OPP is currently developing a survey form to facilitate data collection, data from which will be put into a database. Currently, OPP envisions that data collection as <i>ad hoc</i> (i.e., not relying on data from existing reports).	P2 technical assistance staff are accompanying air (focused on ozone reduction) and waste inspectors (focused on large quantity generators of PBT waste) on their visits to facilities.
IL	# of projects OPP is undertaking with other bureaus (i.e., Air, Land, and Water)	General	Activity-based	Current	Internal	Categories of projects are not tracked.
IL	# of SEPs with P2 provisions	Enforcement	Activity-based	Upcoming	Attorneys will provide this information to OPP. The specific mechanism is yet to be determined.	OPP has just recently trained the attorneys in using SEPs to promote P2.
IL	% of permits with P2 provisions	Permitting	Activity-based	Upcoming	Not yet planned.	This is part of OPP Performance Partnership Agreement.

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Iowa DNR. Source: Jeff Fagle.						
IA	# of P2 checklists that inspectors return to the P2 Office	Inspections	Activity-based	Imminent	Inspectors helped design a P2 checklist that they will now carry on all of their visits, and are supposed to submit them to the P2 Office.	The metrics are being collected as part of a 1-year regulatory integration pilot project.
IA	# of referrals to P2 assistance made by inspectors	Inspections	Activity-based	Imminent	Inspectors helped design a P2 checklist that they will now carry on all of their visits, and are supposed to submit them to the P2 Office.	The metrics are being collected as part of a 1-year regulatory integration pilot project.
IA	Change in # of referrals from before training of inspectors	Inspections	Activity-based	Imminent	Inspectors helped design a P2 checklist that they will now carry on all of their visits, and are supposed to submit them to the P2 Office.	The metrics are being collected as part of a 1-year regulatory integration pilot project.
IA	# of facilities receiving referrals that request P2 assessments	Inspections	Activity-based / Outcome-based	Imminent	Inspectors helped design a P2 checklist that they will now carry on all of their visits, and are supposed to submit them to the P2 Office. Data is also received from technical assistance providers.	The metrics are being collected as part of a 1-year regulatory integration pilot project.
IA	# of facilities implementing suggestions because of referrals by inspectors	Inspections	Outcome-based	Imminent	Inspectors helped design a P2 checklist that they will now carry on all of their visits, and are supposed to submit them to the P2 Office. Data is also received from two technical assistance units, one of which is independent of the agency.	The metrics are being collected as part of a 1-year regulatory integration pilot project.
IA	Pollution reduced via P2 / agency resources used	Inspections	Outcome-based (normalized for activity level)	Imminent	Because of short time frame of pilot project, technical assistance providers will note probable savings for projects. In longer term, the P2 technical assistance providers will try to gauge pollution reduction through follow-up contact with facilities. For agency resources, inspectors will track the time they spend on inspections (also to help gauge whether more time is spent because of P2).	The metrics are being collected as part of a 1-year regulatory integration pilot project.
IA	# of trainings for staff	General	Activity-based	Current	Internal	
IA	# of staff trained	General	Activity-based	Current	Internal	
IA	# of NOVs with P2	Compliance	Activity-based	Imminent	Compliance staff for industrial sectors and POTWs (the areas where this pilot is focused) are responsible for sending carbon copies of the NOVs to P2 staff. P2 staff expect good response, because compliance staff don't really consider it new work.	As part of a 1-year regulatory integration pilot project, the P2 Office recently coordinated an effort to map the enforcement process. Field offices, legal, and technical assistance staff collaborated on where to fit technical assistance into the enforcement process. These measures are an outcome of their coordination.
IA	# of referrals and actual connections to technical assistance staff as a results of NOVs	Compliance	Activity-based	Imminent	Technical assistance providers (2 separate entities, one of which is independent from the DNR) provide this information to P2 staff on monthly or bi-monthly reports.	As part of a 1-year regulatory integration pilot project, the P2 Office recently coordinated an effort to map the enforcement process. Field offices, legal, and technical assistance staff collaborated on where to fit technical assistance into the enforcement process. These measures are an outcome of their coordination.

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IA	# of AOs with P2 language or that are a P2 SEP	Compliance/ Enforcement	Activity-based	Imminent	All AOs/SEPs go to a central, paper database where P2 staff can gather this information.	As part of a 1-year regulatory integration pilot project, the P2 Office recently coordinated an effort to map the enforcement process. Field offices, legal, and technical assistance staff collaborated on where to fit technical assistance into the enforcement process. These measures are an outcome of their coordination.
IA	# of staff hours spent on incorporating P2 into enforcement process	Compliance/ Enforcement	Activity-based	Imminent		As part of a 1-year regulatory integration pilot project, the P2 Office recently coordinated an effort to map the enforcement process. Field offices, legal, and technical assistance staff collaborated on where to fit technical assistance into the enforcement process. These measures are an outcome of their coordination.
IA	Speed of compliance by firms, with and without P2	Compliance/ Enforcement	Outcome-based	Imminent	Still undetermined.	As part of a 1-year regulatory integration pilot project, the P2 Office recently coordinated an effort to map the enforcement process. Field offices, legal, and technical assistance staff collaborated on where to fit technical assistance into the enforcement process. These measures are an outcome of their coordination.
Massachusetts DEP. Source: Paul Walsh, Toxics Use Reduction Act contact.						
MA	Reduction in chemical use/ byproduct creation/ release/ waste among Large Quantity Toxic Users	Planning	Outcome-based	Current	Facility annual report.	Under MA's Toxics Use Reduction Act (TURA), Large Quantity Toxics Users are required to measure toxic chemicals going into and leaving their facilities. They are also required to plan and have a policy for reduction of toxics use. The annually reported data helps establish correlation between planning/policy and outcome.
MA	# of multimedia inspections / year	Inspections	Activity-based	Current		
MA	# of P2 SEPs	Enforcement	Activity-based	Current		
MA	# of facilities receiving letters emphasizing source reduction vs. general letters	Compliance/ Enforcement	Activity-based	Current		
MA	# of technical assistance referrals resulting from letters emphasizing source reduction	Compliance/ Enforcement	Activity-based	Current	From Office of Technical Assistance	
MA	Reduction in perchlorethylene use by dry cleaning industry	Compliance	Outcome-based	Current	As part of its Environmental Results Program, a self-certification compliance program in selected sectors, MA collects information on chemical usage on the self-certification form.	

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MA	Reduction in mercury use among photofinishers	Compliance	Outcome-based	Current	As part of its Environmental Results Program, a self-certification compliance program in selected sectors, MA collects information on chemical usage on the self-certification form.	
Michigan DEQ. Environmental Assistance Division. Sources: Carrie Monosmith and Marcia Horan.						
MI	# of staff trained in P2	General	Activity-based	Current	Internal tracking	The P2 program keeps track of these numbers, but are not asked to report on it.
MI	% of P2 integration strategy completed	General	Activity-based	Current	The P2 section evaluates whether objectives and sub-objectives have been accomplished.	80-85% has been completed.
MI	# of Divisions meeting P2 targets	General	Activity-based	Current	Divisional quarterly reports are forwarded to pollution prevention staff.	Integrating P2 is one of the 9 key areas for which Divisions must set and meet goals. In their quarterly reports, Divisions must explain how they are moving forward toward their goals in each of the 9 areas.
MI	# of SEPs with P2 provisions	Enforcement	Activity-based	Current	Review of quarterly reports, or through contact with regulatory staff.	
MI	# of times P2 staff accompany inspectors to promote P2 alternatives	Inspections	Activity-based	Current	P2 field staff report quarterly on number of site visits made.	The P2 section is in the process of developing industry sector materials that will be distributed to businesses receiving assistance from P2 staff as part of a regulatory inspection. P2 section will also be proposing a five-question checklist for all inspectors to complete as part of inspection procedures.
New Jersey DEP. Sources: Ken Ratzman, Office of Pollution Prevention; P2 Opportunity Tool Questionnaire						
NJ	# of air permit writers that use the "P2 Opportunity Tool"	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	# of permit reviews for which the P2 Opportunity Tool was used	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	% of permit reviews for which the P2 Opportunity Tool was applicable	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	Type of facilities for which the P2 Opportunity Tool is used	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	Types of chemicals for which the P2 Opportunity Tool was used	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.

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NJ	# of permit writers that discuss new information (from the P2 Opportunity Tool) with the facility	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	# permit writers aware that facilities made or planned changes as a result of findings from the P2 Opportunity Tool	Permitting	Outcome- and Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs. The survey does not specify any particular method by which permit staff should gather information for this particular line item, and allows for a response of "Don't know."
NJ	Permit writers that wrote permits differently because of using the P2 Opportunity Tool	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs. This particular line item also asks permit writers to explain how they wrote permits differently.
NJ	Permit writers that learned something new about facilities by using the P2 Opportunity Tool	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	Occurrence of certain types of discoveries by using the P2 Opportunity Tool (i.e., cross-media shifts, fugitive emissions, unpermitted or incorrectly permitted emissions, P2 opportunities, or other)	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	Types of media affected by cross-media shifts	Permitting	Outcome -based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.

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NJ	# of permit staff that notify appropriate programs of cross-media shifts	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	Whether fugitive emissions discovered by permit staff using the tool are "significant compared to the permitted emissions" and whether they are truly fugitives	Permitting	Outcome-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs. This particular line item is important to P2 because fugitive emissions very frequently present easy P2 opportunities.
NJ	Whether incorrectly and/or unpermitted emissions are "significant compared to permitted emissions"	Permitting	Outcome-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	P2 options that are discussed by permit writers	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	Ease of use of the P2 Opportunity Tool (graded on a 4-point scale)	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.
NJ	Reasons that permit writers do not use the P2 Opportunity Tool	Permitting	Activity-based	Imminent	Monthly survey of air permitting staff. The intent of the survey is both to collect data and to remind permit writers to think about P2.	The P2 Opportunity Tool is a materials accounting-based software tool that uses existing New Jersey data to help air permit writers incorporate P2 and multimedia concerns into their everyday jobs.

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New York State DEC P2 Unit. Sources: Dan DeMicco; NYSDEC, "1997 Annual Report: Multi-Media Pollution Prevention in New York State," April 1999; and 1999 Summary Facility Reporting Form. For more						
NY	Performance of M2P2 facilities vs. non-M2P2 facilities	Inspections	Outcome-based	Proposed	BRS and TRI databases.	<p>New York's M2P2 (MultiMedia Pollution Prevention) Program is a comprehensive, integrated approach to environmental management. One feature of the program "has been the 'Integrated Facility Management' program that focuses on a manageable subset of New York State's industrial facilities - the 400 or so facilities that generate and release 95% of the State's hazardous substances."</p> <p>ANALYSIS 1: The plan is to use the entire 1990-1996/97 combined NYS Hazardous Waste Generation (RCRA Biennial Reporting System--BRS) and TRI set of databases. Identify each facility that is an M2P2 facility (from 1993 to 96/97) and retrieve generation and release data. Then, calculate total pollution reductions at all facilities subject to M2P2 and all non-M2P2 facilities for 1996, compared to their respective 1990 figures. Then calculate respective % reductions, differential reductions, and differential reduction % between the two sets of facilities.</p>
NY	Time-series performance of M2P2 facilities	Inspections	Outcome-based	Proposed	BRS and TRI databases.	<p>ANALYSIS 2: This focuses on the amount and % change in reduction relative to the year of the M2P2 inspection. Using BRS/TRI, determine the amount and % reduction from 1990 to the year of the inspection, and from the year of the inspection for each year afterwards up to 1996 or 1997. Calculate projected generation and releases from the year of the inspection, with 1990 as the baseline. Total all facility reductions and compare to overall actual and projected reductions, and compare % reductions.</p>
NY	Performance of facilities correlated to M2P2 vs. non-M2P2 government activities	Inspections	Outcome-based	Proposed	BRS and TRI databases, combined with data from non-M2P2 programs.	<p>ANALYSIS 3: A set of comparative analyses to help determine the effect of other governmental programs on facility pollution reductions, compared to M2P2. First, enter data from the Hazardous Waste Reduction Plan, Enforcement, and perhaps Clean Air Act (which has a significant P2 component) into the BRS/TRI database. Conduct a similar sequence of analyses for each of these programs, as were applied to the M2P2 facilities for each set of facilities that were/were not subject to each of these programs. Compare reductions for facilities in these programs with facilities that were not, and determine whether or not their reductions are comparable to those of M2P2 facilities, thus allowing some determination to be made as to these programs' comparative effectiveness. Time allowing, determine whether sets of facilities that are simultaneously subject to 2,3, or 4 of the above programs have more significant pollution reductions than those which are subject to fewer.</p>

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NY	Linking M2P2 activities to client outcomes, in turn linking to environmental and financial outcome.	Inspections	Outcome-based	Proposed	Using readily available recorded data from BRS/TRI, Facility Summary Forms (selected metrics from the forms are included below), M2P2 inspection reports, Governor's Awards applications., etc. Some new data collection from facilities and DEC staff may be necessary.	ANALYSIS 4: This analysis takes a subset of ANALYSES 1 and 2 above. First, use random or stratified sampling to select this subset. Identify specific government program activities (and perhaps some client activities) and client behavior outcomes at each facility. Link these activities to client behavior outcomes, which then will be linked to specific environmental outcomes (pollution reductions) and facility financial outcomes (\$ saved). Compare these pollutant reductions to the BRS and TRI (and other) data to determine amount of reductions which may be attributable to specific P2 activities. Total all of these facilities (and constituent activities and outcomes) to produce aggregate statistics to document the extent and effects of various types of P2 efforts for the facilities as a group.
NY	# of environmental management recommendations issued by M2P2 team (includes P2 suggestions)	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	The survey also requests qualitative lists of the "most significant" accomplishments and problems associated with M2P2 Initiative Implementation at this facility.
NY	# of facilities at which environmental management recommendations were issued by M2P2 team	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# of environmental management recommendations implemented by facilities (includes P2 recommendations)	Inspections	Outcome-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# of facilities at which environmental management recommendations were implemented	Inspections	Outcome-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	Financial gain associated with recommendations implemented at facilities	Inspections	Outcome-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
NY	Environmental gain associated with recommendations implemented at facilities	Inspections	Outcome-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# of completed M2P2 inspections	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# of M2P2 Draft Evaluation Reports	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# of M2P2 finalized evaluation reports	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# switched to M2P2 maintenance mode	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# of M2P2 consent orders completed	Inspections/ Compliance	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# of M2P2 consent orders in draft	Inspections/ Compliance	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# of M2P2 consent orders anticipated	Inspections/ Compliance	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	
NY	# of M2P2 orders with provisions for pollution prevention plans	Inspections/ Compliance	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with planned, draft, or finalized orders
NY	# of M2P2 orders with provisions for BMP plans	Inspections/ Compliance	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with planned, draft, or finalized orders

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
NY	# of M2P2 orders with provisions for environmental management systems (EMSs)	Inspections/ Compliance	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with planned, draft, or finalized orders. EMSs may or may not include P2 components.
NY	# of M2P2 orders with provisions for environmental audits	Inspections/ Compliance	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with planned, draft, or finalized orders
NY	# of M2P2 orders with provisions for accidents/risk reduction plans	Inspections/ Compliance	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with planned, draft, or finalized orders
NY	# of M2P2 facilities with voluntary BMP plans	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with voluntary initiatives
NY	# of M2P2 facilities with voluntary environmental management systems (EMSs)	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with voluntary initiatives. EMSs may or may not include P2 components.
NY	# of M2P2 facilities with voluntary environmental audits	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with voluntary initiatives
NY	# of M2P2 facilities with voluntary pollution prevention plans	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with voluntary initiatives
NY	# of M2P2 facilities with voluntary accident/risk reduction plans	Inspections	Activity-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with voluntary initiatives
NY	Expenditures by facilities as a result of voluntary or required M2P2 actions	Inspections/ Compliance	Outcome-based	Current	The P2 unit requests that M2P2 teams submit this data annually by filling out a "Summary Facility Reporting Form" for each facility for all that year's new or carried-over M2P2 facilities. The data is compiled into an annual report.	For facilities with voluntary initiatives or with planned/draft/finalized orders.

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
North Carolina. Source: Gary Hunt, Director of the Division of Pollution Prevention.						
NC	No notable P2 regulatory integration measurements.					
Northeast Waste Management Officials' Association (NEWMOA) P2 Metrics Menu. Sources: Terri Goldberg, NEWMOA; NEWMOA Memorandum of Agreement on P2 metrics, 1999; NEWMOA "Pollution Prevention						
NE States	# of program clients that received on-site assistance as a result of referral or notice by the state/ local enforcement/ compliance program in a year	Compliance/ Enforcement	Activity-based	Proposed	Not specified.	
NE States	# of environmental violations at state agencies/facilities that are remedied by pollution prevention	Enforcement	Outcome-based	Proposed	Not specified.	
NE States	# of environmental agency staff receiving P2 training	Agency-wide	Activity-based	Proposed	Not specified.	
NE States	# of inspections including P2 information dissemination	Inspections	Activity-based	Proposed	Not specified.	
NE States	# of notices of violation or non-compliance that the state issued with P2 suggestions	Compliance/ Enforcement	Activity-based	Proposed	Not specified.	
NE States	# of enforcement actions that included provisions related to P2 that were issued	Enforcement	Activity-based	Proposed	Not specified.	

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
NE States	# of entities that came into compliance, at least partially, via P2	Compliance	Outcome-based	Proposed	Not specified.	
NE States	# of entities that went beyond compliance and conducted P2 activities in their response to a SEP as part of an enforcement action	Enforcement	Outcome-based	Proposed	Not specified.	
NE States	# of business, institutional or community clients that maintained purchasing and use records for their chemical input inventories	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Purchasing and use records for chemical inventories are required as part of environmental management system under ISO 14000 requirements. These records provide a systematic way of analyzing how much an entity purchased of specific compounds in a year.	
NE States	# of business, institutional or community clients with environmental or P2 policy statements	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	
NE States	# of business, institutional or community clients with P2 teams	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	
NE States	# of business, institutional or community clients that have mapped their process	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	
NE States	# of employees of business, institutional or community clients trained in pollution prevention	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
NE States	Total amount of hazardous waste reduced through P2 by program clients	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	Hazardous waste reductions should be reported as pounds generated before and after implementing P2 project
NE States	Change in # of hazardous waste generators (LQGs) and small quantity generators (SQGs)	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	LQGs are defined as "facilities that generate more than 1,000 kilograms (2,200 pounds) of hazardous waste per month or that generate or accumulate more than 1 kilogram (2.2 pounds) of acute hazardous waste at one time." SQGs are defined as "facilities that generate between 100 kilograms (220 pounds) and 1,000 kilograms (2,200 pounds) of hazardous waste in any calendar month."
NE States	Total amount of solid waste reduced through P2 by program clients	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	Solid waste reductions should be reported as pounds generated before and after implementing P2 project.
NE States	Total amount of water pollution reduced through P2 by program clients	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	Water pollution reductions should be reported as pounds of pollutants, such as heavy metals and other inorganic and organic materials discharged before and after P2 implementation
NE States	Total amount of air pollutants reduced through P2 by program clients	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	Air pollution reductions should be reported as pounds generated before and after P2 implementation. Break into the following categories: hazardous air pollutants, volatile organic compounds, criteria pollutants.
NE States	Total amount of toxic/hazardous chemical use reduced through pollution prevention	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	Reductions in toxic/hazardous chemical use should be reported in pounds or tons per year as compared to previous year
NE States	Total amount of water conserved by program clients	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	Water use reductions should be reported as gallons discharged before and after P2 implementation
NE States	Total amount of energy conserved by program clients	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	Energy conservation should be reported as either BTUs, gallons of fuel, or pounds of fuel saved before and after P2 implementation. The units will depend on the type of energy that was conserved.

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
NE States	Amount of money saved by program clients that implemented pollution prevention	Could Vary (not specifically designed for P2 integration)	Outcome-based	Proposed	Not specified.	These savings can be expressed as gross annual savings to the company or community resulting from the investments that are made because of the P2 suggestions offered by the P2 program. In addition to estimates of the gross annual savings, the program should request an estimate of the number of years that the investment is expected to provide value to the company. An alternative definition could focus on "return on investment" (ROI), which is often called net present value (NPV), as a more accurate reflection of the true project savings. ROI calculations are more complicated to derive than gross savings, and require more data collection by the programs and clients. In order to figure out the ROI, the program or client would have to know all of the significant costs and savings of the project over its projected lifetime. The net savings is the difference between them. In order to accurately estimate the ROI, the estimated net savings for future years should be adjusted to account for the time value of money, which will result in the NPV of the investment.
Oregon DEQ. Sources: Dave Kunz; Marianne Fitzgerald (for Green Permits and Strategic Planning)						
OR	# of staff trained in P2 during training	General	Activity-based	Current	Internal to P2 office.	
OR	# of NONs with P2 language	Compliance/ Enforcement	Activity-based	Current	Inspectors check off a box in the enforcement data tracking system.	
OR	# of SEPs with P2 provisions	Enforcement	Activity-based	Current	Via enforcement data tracking system	
OR	Results of P2 projects under SEPS	Enforcement	Outcome-based	Current	Facilities must submit proof of SEP completion to enforcement staff, who transmit this information to P2 staff.	When possible, this includes the amount of pollution reduced. One example is the following: when a local high school inventoried and removed a large quantity of substances from its chemistry lab, the # of pounds of source chemicals removed was reported to DEQ.
OR	% of program strategic plans including P2	General/ Strategic	Activity-based	Current	Examination of strategic workplans.	Oregon is in Round 2 of their strategic planning effort. Round 1 saw 25% of plans with P2 components.

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
OR	# of "Gray Hat" visits generated by the cross-media checklist	Inspections	Activity-based	Potential	Data collection via central database.	The P2 program is considering tracking various data associated with its cross-media checklist, a tool that inspectors carry with them and input into a central database. When an inspector finds an other-media potential violation, that inspector routes a copy of the checklist to the applicable programs. Then, inspectors from other programs can go out on technical assistance (rather than enforcement) visits. Whatever they do, they must make notes of their actions on the checklist copy, and send a copy back to the originator, who enters the data into a central database. The listed measure is one that the P2 unit envisions capturing. Note that the cross-media checklist doesn't explicitly include P2 on it (e.g., in a check-box), but provides a format for reporting on technical assistance, which may be P2-oriented.
OR	BMPs adopted by a facility, vs. a baseline of BMPs	Permitting, but could be applied to inspections	Outcome-based	Current--experim in two pilot projects	Inspectors/permit writers establish baseline during walkthrough by seeing which BMPs are being practiced. After assistance or other action, another walkthrough is conducted to assess whether new BMPs have been implemented.	In the Coos Bay pilot project, the P2 unit assisted a multimedia team in setting up a baseline for ship-maintenance BMPs. After establishing the baseline, the team provided technical assistance, and came back six months later to gauge progress based on a BMP scoring sheet. Note: Oregon has also measured P2 progress via BMP baseline in another, non-integration project: its EcoLogical Recognition Program aimed at the automotive repair sector in Portland.
OR	Pollution reduced via Green Permits	Permitting	Outcome-based	Upcoming (pending approval of pilot permits)	Companies in the Green Permits program must have performance standards in their EMSs, and submit reports indicating achievement of those standards. Those reports will enable tracking of P2 outcomes, such as pollution reduced.	4 or 5 companies are participating in this pilot stage, and are nearing completion of their permits.
Texas NRCC. Sources: Ken Zarker in Small Business/Environmental Assistance; Draft "TNRCC Pollution Prevention Integration Project: Projects Summary Report," June 14, 1999.						
TX	% of orders/judgments that included P2	Enforcement	Activity-based	Current, annual	P2 line item in Enforcement database. "Enforcement staff are determining 'Case Conclusion Data after TNRCC orders are issued or cases are administratively resolved. "	
TX	% of AO that included SEPs	Enforcement	Activity-based	Current, annual	P2 line item in Enforcement database. "Enforcement staff are determining 'Case Conclusion Data after TNRCC orders are issued or cases are administratively resolved. "	
TX	% of SEPs that included P2	Enforcement	Activity-based	Current, annual	SEP database	
TX	# of P2 actions included in orders/judgments	Enforcement	Activity-based	Current, annual	P2 line item in Enforcement database. "Enforcement staff are determining 'Case Conclusion Data after TNRCC orders are issued or cases are administratively resolved. "	Multiple P2 actions could be included in one order. E.g., 176 Orders/Judgments in FY98 that included 238 P2 actions.

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
TX	Estimated pollutants eliminated or reduced (pounds per year), or routes of exposure reduced, in orders/judgments.	Enforcement	Outcome-based	Current	P2 line item in Enforcement database. "Enforcement staff are determining 'Case Conclusion Data after TNRCC orders are issued or cases are administratively resolved. "	The data includes the estimated environmental results from the enforcement action, expressed in pounds per year of pollutant saved. In addition, the data includes a series of questions regarding whether the actions to correct the violations involved pollution reduction and prevention." The estimates are based on the judgment of each individual enforcement coordinator. They are based on some guidance, but the determinations are essentially <i>ad hoc</i> , not using existing data sources.
TX	% of compliance through P2	Inspections	Outcome-based	Still to be defined	Still to be defined	
TX	# of P2 referrals submitted to P2 office by Field Operations Division	Inspections	Activity-based	Current	Internal	
TX	# of Investigators receiving P2 certification	Inspections	Activity-based	Current	Transmitted by field operations to P2 office.	
TX	# of Investigators receiving P2 training	Inspections	Activity-based	Current	Transmitted by field operations to P2 office.	
TX	# of P2 Fact Sheets Distributed to Regulated Entities	Inspections	Activity-based	Current	Transmitted by field operations to P2 office. P2 office has tried to collect other data via a short checklist, but inspectors have resisted an additional checklist.	
TX	% of air emissions reductions attributable to source reduction through NSR permitting	Permitting	Outcome-based	Current	To be collected this year from a permitting database. Each permit writer includes reductions information in their standard permit application review form. Database has been altered to allow easier access to relevant P2 data.	NSR permitting staff have incorporated P2 into their permit PI-1 Application Form, application instructions, and technical review document template. Each permit applicant will be required to address the potential for source reduction as part of the BACT consideration. The form is available on the internet.
TX	# of documents (for NSR permits) changed to highlight P2	Permitting	Activity-based	Current	NSR staff provided this information to P2 staff.	These were industry-specific guidance documents developed to include P2 as part of the BACT determination.
TX	# of NSR staff receiving training on coatings P2	Permitting	Activity-based	Current	Internal	
TX	% of Industrial and Haz.. Waste (I&HW) pre-permit meeting incorporating P2 information	Permitting	Activity-based	Current	P2 staff contact I&HW to gather this data.	

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
TX	# of technical assistance projects and P2 projects that result from pre-permit meetings	Permitting	Outcome-based	Current	Internal	
TX	% of Industrial and Haz.. Waste (I&HW) permit renewals incorporating P2 requirements	Permitting	Activity-based	Current	P2 staff contact I&HW to gather this data.	
TX	% of Industrial and Haz.. Waste (I&HW) staff receiving P2 training	Permitting	Activity-based	Current	Internal	
TX	# of voluntary P2 assessments conducted via TPDES	Permitting	Activity-based	Delayed, pending NPDES delegation.		Revised TPDES program will incorporate P2 language.
TX	# of facilities originally above thresholds which reduce discharges to become eligible for wastewater general permits	Permitting	Outcome-based	Delayed		TNRCC is now able to issue wastewater general permits incorporating BMPs, including P2 opportunities
TX	# of air rules that incorporate P2 (arising out of de minimis rulemaking)	Rulemaking	Activity-based	Current	P2 staff are on the multimedia rulemaking team, so they are aware of the results.	
TX	# or % of agency staff attending training regarding incorporating P2 into rules	Rulemaking	Activity-based	Current	Internal	
TX	# of rules with P2 components completed	Rulemaking	Activity-based	Current	Rule Log database now has a line item for P2 components.	The Rules and Policy Review Committee reviews each rule proposal to identify rules with P2 opportunities.
TX	# of multi-media rulemaking teams	Rulemaking	Activity-based	Current	P2 staff compile this number annually by looking at the makeup of rulemaking teams, which are generally but not always multimedia.	This practice is encouraged by the Rules and Policy Review Committee.

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

State	Metric	Reg. Category	Metric Type	Collection Status	Data Collection Method	Additional Comments
TX	# of facilities implementing P2 strategies within a targeted TMDL watershed	Other Reg. Int.	Outcome-based	Current	Internal. Information collected by P2/Environmental Assistance staff contacting the facilities.	P2 evaluations for certain constituents are being incorporated into TMDLs

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Examples of P2 Regulatory Integration Metrics Being Collected by State P2 Programs*

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Washington Dept of Ecology. Source: Hugh O-Neill.						
WA	# of inspections at which P2 has been addressed	Inspections	Activity-based	Current	Inspectors are supposed to submit a copy of their inspection report to the P2 Office anytime P2 is involved in an inspection.	
WA	Frequently suggested P2 opportunities	Inspections	Activity-based	Current	Inspectors are supposed to submit a copy of the report to the P2 Office anytime P2 is involved in an inspection.	
WA	# of joint visits by P2 staff with any other inspections staff	Inspections	Activity-based	Current	Internal to P2 Office	
WA	# of tons of pollution reduced because of P2 in air permits.	Permitting	Outcome-based	Current	The P2 Office tries to follow-up one year after the permit is issued.	

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