Complete New Hampshire Package:

_x_ SF 424 – Application for federal assistance
_x_ SF 424A – Budget form
_x_ SF 424B – Assurances for non-construction programs
_x_ EPA Form 5700-49 – Debarment & Suspension Certification
_x_ Lobbying Disclosure form
_x_ EPA Form 4700-4 – Preaward Compliance Review
_x_ Quality Assurance Project Plan
N/A Copy of Negotiated Indirect Cost Rate Agreement
_o_ Biographical Sketch (excluded from copies)
_x_ Other supporting documents
_x_ Email & contact information
_x_ Narrative Statement / Workplan

Version 9/03

APPLICATION FOR FEDERAL ASSISTANCE

1. TYPE OF SUBMISSION: Application: __ Construction ✓ Non-Construction; Pre-application: __ Construction __ Non-Construction	**2. DATE SUBMITTED** 12-06-2001	Applicant Identifier
	3. DATE RECEIVED BY STATE	State Application Identifier
	4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier

5. APPLICANT INFORMATION

* Legal Name: State of New Hampshire - Dept. of Environmental Services	**Organizational Unit:**
	Department: Environmental Services
* Organizational DUNS: 042828025	Division: Office of the Commissioner
Address:	**Name and telephone number of person to be contacted on matters involving this application (give area code)**
* Street 1: P.O. Box 95 Street 2: 29 Hazen Drive	Prefix: Mr. | * First Name: Robert
* City: Concord	Middle Name: P.
County: Merrimack	* Last Name: Minicucci
* State: NH | * Zip Code: 03302-0095	Suffix:
* Country: USA	Email: rminicucci@des.state.nh.us
6. * EMPLOYER IDENTIFICATION NUMBER (*EIN*): 02-6000618	* Phone Number (give area code) (603) 271-2941 | Fax Number (give area code) (603) 271-2867
8. TYPE OF APPLICATION: ✓ New __Continuation __Revision If Revision, enter appropriate letter(s) in box(es) Other (specify)	**7. * TYPE OF APPLICANT:** State Government Other (specify)
	9. * NAME OF FEDERAL AGENCY: Environmental Protection Agency
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 66.940 TITLE: Environmental Policy and State Innovation Grants	**11. * DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:** "Encouraging Superior Environmental Performance Through Management Systems, Recognition, and Rewards"
12. * AREAS AFFECTED BY PROJECT (*Cities, Counties, States, etc.*): Statewide	
13. * PROPOSED PROJECT	**14. * CONGRESSIONAL DISTRICTS OF:**
Start Date: 02-01-2006 | * Ending Date: 09-30-2009	* a. Applicant 2 | * b. Project Statewide

15. * ESTIMATED FUNDING:		**16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?**
* a. Federal	$	a. Yes ✓ THIS PREAPPLICATION / APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE: 01-12-2006
* b. Applicant	$	
* c. State	$	b. No __ PROGRAM IS NOT COVERED BY E.O. 12372
* d. Local	$	__ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW
* e. Other	$	
* f. Program Income	$	**17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?**
g. TOTAL	$	__Yes If "Yes" attach an explanation. ✓ No

18. * TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES.

a. Authorized Representative		
Prefix: Mr.	* First Name: Vincent	Middle Name: R.
* Last Name: Perelli		Suffix:
* b. Title: Chief of Planning and Policy		* c. Telephone Number (give area code): (603) 271-8989
* Email: vperelli@des.state.nh.us		Fax Number (give area code): (603) 271-2867
d. Signature of Authorized Representative: Vincent Perelli		e. Date Signed: 01-12-2006

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Standard Form 424 (Rev. x-xx)
Prescribed by OMB Circular A-102

Tracking Number: GRANT00073559

BUDGET INFORMATION - Non-Construction Programs

OMB Approval No. 0348-0044

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Environmental Policy and State Innovation Grants	66.940					
2.						
3.						
4.						
5. Totals						

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1) Environmental Policy and State Innovation Grants	(2)	(3)	(4)	
a. Personnel					
b. Fringe Benefits					
c. Travel					
d. Equipment					
e. Supplies					
f. Contractual					
g. Construction					
h. Other					
i. Total Direct Charges (*sum of 6a-6h*)					
j. Indirect Charges					
k. TOTALS (*sum of 6i and 6j*)					
7. Program Income					$0.00

Standard Form 424A (Rev. 7-97)
Prescribed by OMB Circular A-102

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Tracking Number: GRANT00073559

SECTION C - NON-FEDERAL RESOURCES				
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8. Environmental Policy and State Innovation Grants - NH Environmental Leadership Program				
9.				$0.00
10.				$0.00
11.				$0.00
12. TOTAL (sum of lines 8-11)				

SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal					
14. Non-Federal	$0.00				
15. TOTAL (*sum of lines 13 and 14*)					

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
(a) Grant Program	FUTURE FUNDING PERIODS (Years)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16. Environmental Policy and State Innovation Grants				
17.				
18.				
19.				
20. TOTAL (*sum of lines 16-19*)				

SECTION F - OTHER BUDGET INFORMATION	
21. Direct Charges:	22. Indirect Charges:
23. Remarks:	

Authorized for roduction

ASSURANCES - NON-CONSTRUCTION PROGRAMS

OMB Approval No. 0348-0040

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis- Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327- 333), regarding labor standards for federally-assisted construction subagreements.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93- 205).

12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).

14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

* SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL Vincent Perelli	* TITLE Chief of Planning and Policy	
* APPLICANT ORGANIZATION State of New Hampshire - Dept. of Environmental Services		* DATE SUBMITTED 01-12-2006

EPA

EPA Project Control Number

United States Environmental Protection Agency
Washington, DC 20460

Certification Regarding Debarment, Suspension, and Other Responsibility Matters

The prospective participant certifies to the best of its knowledge and belief that it and the principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;

(b) Have not within a three year period preceding this proposal been convicted of or had a civil judgement rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a government entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State, or local) terminated for cause or default.

I understand that a false statement on this certification may be grounds for rejection of this proposal or termination of the award. In addition, under 18 USC Sec. 1001, a false statement may result in a fine of up to $10,000 or imprisonment for up to 5 years, or both.

Michael P. Nolin, Commissioner

ed Name & Title of Authorized Representative

ature of Authorized Representative

Michael P. Nolin

Date

01 12 06

☐ I am unable to certify to the above statements. My explanation is attached.

rm 5700-49 (11-88)

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

* APPLICANT'S ORGANIZATION State of New Hampshire - Dept. of Environmental Services
* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE Prefix: Mr. * First Name: Vincent Middle Name: R. * Last Name: Perelli Suffix: * Title: Chief of Planning and Policy
* SIGNATURE: Vincent Perelli * DATE: 01-12-2006

State Innovation Grant Program:
NHDES Project Narrative/Workplan

Project Title: Encouraging Superior Environmental Performance Through Management Systems, Recognition, and Rewards.

Applicant: New Hampshire Department of Environmental Services (NHDES)

Contact: Robert P. Minicucci II, PE, Special Projects Manager
NHDES
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
(p) 603-271-2941
(f) 603-271-2867
rminicucci@des.state.nh.us

Funding Request: $234,120

Project Period: From acceptance of grant (anticipated to be in early calendar year 2006) to September 30, 2009.

Abstract:

This document details a work plan for NHDES's project "Encouraging Superior Environmental Performance Through Management Systems, Recognition and Rewards". This project is intended to encourage systematic environmental management by organizations throughout New Hampshire for better environmental performance, within and outside of those areas traditionally regulated, and specifically addresses NHDES's intentions to establish a New Hampshire-based Environmental Leadership Program, to be similar to the United States Environmental Protection Agency's (EPA's) National Environmental Performance Track.

Project Background

A need to achieve environmental performance beyond, and outside of, areas traditionally regulated in the U.S. is merging with concerns about persistent and emerging environmental problems to spark debate about environmental policy tools. Today, many instruments are available – from the existing traditional performance- and technology-based regulatory approaches, to innovative government programs, to new private sector initiatives such as environmental performance reporting and environmental management systems. The subject project is for NHDES to conduct several tasks and projects to use these new instruments, leading up to the development and implementation of a performance-based reward and recognition program (current working title: NH Sagamore) mirroring US EPA's National Environmental Performance Track (Ptrack).

The PTrack program, which was established in 2000, offers recognition and some tangible incentives to organizations that demonstrate consistent compliance with environmental laws and regulations and which commit to achieving specific measurable environmental benefits above and beyond that required by laws and regulations. Organizations within the PTrack program have earned their way into different relationships with the EPA (and their) states. This new relationship, in which the public receives assurances of proper environmental performance by different means than the existing enforcement-based command and control approach, can not be realized in full if it only affects the federal government – organizations are required to deal with the federal and state governments at the same time, so having both governmental levels cooperating to the extent possible is especially important here. Many states (e.g., Wisconsin, Maine, North Carolina, South Carolina, Georgia, Texas, Utah, Idaho, etc.) have similar such programs, and EPA has established a Memorandum of Agreement process to document the extent of program overlap and/or cooperation between the state and federal government.

The work described in this proposal is not limited to establishing such a program for NH; it describes several tasks designed to improve environmental management in general around the state, hopefully culminating in the design and implementation of the NH Sagamore program.

While the program herein called NH Sagamore has not been designed yet, we anticipate a three-tier program: one for "beginners" who demonstrate compliance and a willingness to perform beyond the minimums described in laws; a second which would be roughly equivalent to PTrack; and a third which would establish contracts, or covenants, for organizations that demonstrate that they can meet the goals of environmental laws through pathways not described in the current laws and regulations. Conceptually, permits may be included within this contract, but this remains to be established. Obviously, this third, "contractual", tier involves the most thought and work and may never actually be established. Please note however, that NH Revised Statutes Annotated (RSA) Chapt. 125-c:6(a) gives NHDES's Commissioner authority to establish such agreements, within the realm of the state's air quality statutes.

We believe that the work to be carried out under this proposal would fully support EPA's *Strategy for Determining the Role of Environmental Management Systems in Regulatory Programs*, EPA's *Innovations Strategy*, and the January 2005 ECOS report *Survey of State Support for Performance-Based Environmental Programs and Recommendations for Improved*

Effectiveness to Administrator Leavitt on National Environmental Performance Track. The proposed work furthers EPA's Strategic Goals, especially Goal 5: Compliance and Environmental Stewardship.

Additionally, the work described in this proposal is contained within an identified "Area for Collaboration" in the approved *2005-2007 NHDES-USEPA Performance Partnership Agreement* (PPA), which can be found at: **http://www.des.nh.gov/ppa/pdf/FFY2005-2007PPAFinal 02.25.05.pdf**. The Area of Collaboration, titled "Encourage Systematic Management for Better Environmental Performance" is on page 26 of the PPA.

Technical Approach

Project Overview

NHDES has been working to extend the fulfillment of its mission "to help sustain a high quality of life for all citizens by protecting and restoring the environment and public health in New Hampshire" by using regulatory command-and-control methods, but also by using other tools. The work described herein is to continue this work into more sophisticated areas involving holistic and systematic environmental management. Policy-level goals of this work include:

- Increase internal and external awareness and acceptance of the value of a systematic approach to managing environmental responsibilities;
- Improve compliance with laws and regulations by helping people and organizations address those requirements in a systematic way;
- Promote and achieve better environmental performance in regulated areas (*e.g.,* air emissions, water quality, hazardous waste generation, etc);
- Promote and achieve better environmental performance in areas not traditionally regulated (*e.g.,* energy use, water consumption, habitat protection, etc); and
- Re-allocate limited agency resources based on need and risk by building a system of differentiating organizations on a performance basis.

The various tasks and projects proposed here to begin reaching those goals range on a continuum that extends from small and simple, to larger and more complex.

Proposed Project Work Plan

This project's major tasks and timetable are outlined in the table below. It should be understood that, due to New Hampshire-specific legal requirements, "Start date" = date of the formal acceptance of the grant by the NH Governor & Executive Council, and not the date of formal EPA grant award. Note that **bolded** dates indicate a project milestone for tracking purposes.

Table 1: Schedule of Major Project Tasks

	Task Name	Task Description	Outputs Expected (Excerpted from Fig. 2)	Start Date	End Date
1	Policy	Update and publicize NHDES' policy on encouraging systematic environmental management.	Updated policy	Start Date + 30 days	**Start date + 90 days**
2	Website	Establish enhanced NHDES website resources for EMS-related information.	Updated website	Start Date + 90 days	**Start Date + 120 days**
3.1	Advisory Group established	Establish and maintain an Advisory/ Stakeholder group. Re-establishes previous group that was active in 1997–2000.	Invitation letters List of group members	**Group established by Start Date + 120 days**	Ongoing throughout grant period.
3.2	Advisory Group maintained	Maintain Advisory/ Stakeholder group. May morph into a NH Sustainable Business Roundtable. Meetings anticipated to be quarterly or tri-annual through grant period.	Meeting minutes Group's recommendations	**First meeting anticipated by Start Date + 150 days.**	Ongoing throughout grant period.
4.1	Strategy & procurement for EMS Training	With advisory group, establish strategy and procure contractor(s) for EMS training.	Strategy document (possibly within meeting minutes) RFQ/RFP for contractor Successful procurement	**Strategy chosen by Start Date + 6 months.**	**Contractor procured by Start Date + 12 months**

Table 1: Schedule of Major Project Tasks

	Task Name	Task Description	Outputs Expected (Excerpted from Fig. 2)	Start Date	End Date
4.2	Deliver EMS Training	Offer training in EMS implementation, separately for public and private sectors.	Invitations to training sessions Records of sessions & attendance lists. Survey results on: • Organizations' understanding & use of EMSs • DES staff understanding of EMSs • Regulators' trust of EMS-using facilities • Changes to DES budget & staff priorities.	**First training delivered by Start Date + 14 months**	**Training seminars completed by Start Date + 24 months**
5	College Curricula	Increase consideration of environmental concerns at management schools	Record of meetings with colleges	**Initial meetings at Start Date + 12 months**	**Check for curriculum changes at Start Date + 30 months**
6.1	SME Management	With advisory group, develop strategy to improve management skills in the SME sector.	Strategy to be included with, or appended to, minutes of advisory group meetings & in 1/4ly reports to EPA.	**Strategy established by Start Date + 12 months**	See 6.2, below
6.2	SME Management	Take actions, per strategy established in 6.1, to improve management skills in the SME sector.	Per strategy established above. No. of registrations & Baldridge applications.	**Start Date + 13 months.**	Anticipated to be end of grant period
7.1	Mentoring strategy	With advisory group, establish strategy to encourage larger organizations to mentor smaller ones. May include "greening the supply chain" projects, but not necessarily limited to this area.	Strategy to be included with, or appended to, minutes of advisory group meetings & in 1/4ly reports to EPA.	**Strategy in place by Start Date + 12 months**	See 7.2, below

Table 1: Schedule of Major Project Tasks

	Task Name	Task Description	Outputs Expected (Excerpted from Fig. 2)	Start Date	End Date
7.2	Mentoring activities	Implement mentoring strategy established in 7.1	Per strategy established above. Survey to check for existence & success of me	**Start Date + 14 months.**	Ongoing throughout grant period
8.1	Sagamore Design	With advisory group, design a multi-tiered Reward and Recognition Program, one tier of which would be equivalent to the existing Ptrack. Current working title "NH Environmental Sagamore Program." (NH Sagamore). Design to include entry & exit criteria.	Progress to be included with, or appended to, minutes of advisory group meetings & in 1/4ly reports to EPA. Proposal for new program to DES.	Start by Start Date + 90 days.	**Start Date + 12 months**
8.2	Sagamore Support	a) Obtain final DES management approval to implement NH Sagamore. b) Write initial program "manual" c) Propose legislation	a) Record of approval, likely a memo to file b) Draft Manual c) Draft legislation	**d) Start Date + 13 months e) Start Date + 18 months f) Start Date + 18 months**	**Legislation, possibly modeled on NH RSA 125:C-6a in 2007 or (more likely) 2008 session.**

Table 1: Schedule of Major Project Tasks

	Task Name	Task Description	Outputs Expected (Excerpted from Fig. 2)	Start Date	End Date
8.3	Sagamore implementation	a) Publicize program b) Recruit members c) Admit members d) Obtain members' performance reports	a) Copies of press releases & other publicity materials. b) Invitation letters, record of meetings and other contacts. c) Record of admittance decisions, press material announcing same. d) Requests for reports and the reports themselves.	e) Start date + 14 months **f) Start date + 18 months** **g) Start Date + 22 months** h) **Start Date + 34 months**	No end date anticipated. Grant will expire while program hopefully goes on.
9	Project Reports	Quarterly and final Project Reports.	Quarterly and final Project Reports	**Start Date + 90 days**	**Close of the project period + 120 days**

The following expands on some of the above-listed tasks:

Task 3: All work in this project will be done not only under NHDES oversight, but also in full collaboration with a stakeholder group to be established under this Task. NHDES anticipates that this group will have participants from: business and trade groups; NH government, including elected officials; environmental organizations; and academics. Meetings, and in fact all work products in this work, will be public information and will be posted at the augmented web space anticipated in Task 2. The similar group assembled for the EPA Office of Water project titled "Voluntary EMS Program" (EPA Grant #X991076) in the late 1990s had such participation.

Public involvement processes must be robust for the proposed program to succeed. This is the custom in New Hampshire, and we expect this tradition to continue. As the proposed program in some ways represents basic changes to the more traditional/formal NHDES-regulated entity relationship, public buy-in will be essential to success. We anticipate the new stakeholder group meeting at least quarterly. Press releases will be issued. Outreach will be proactive.

It should be noted that a meeting of NH business and government leaders to discuss improved uptake of sustainability concepts is tentatively scheduled for March of 2006. NHDES anticipates using this meeting as a springboard to begin the work described here.

Task 4: In order to offer assistance in EMS implementation, we will:

- Seek opportunities to partner with academic institutions and business service providers in order to expand existing offerings and curricula to include the benefits of a systematic approach to environmental management. The college/university system of NH and business/management schools in the state would be targeted. This work would be supportive of a new "Virtual EMS" project currently being led by Dartmouth College and the University of NH. DES would also explore partnerships with internal and external service providers such as the New Hampshire Pollution Prevention Program, the Small Business Technical Assistance Program, Occupational Safety and Health Consultation, as well the WasteCap Resource Conservation Network, the Small Business Development Center, Manufacturing Extension Partnership, Granite State Quality Council, Sustainable Step New England, NH Businesses for Social Responsibility, etc.
- Offer several one-day, introductory seminars on Environmental Management Systems (EMSs) for several different audiences: 1) the State, including NHDES staff and other state agency representatives; 2) Regulated entities - this would likely be repeated a number of times on a sector-specific basis, and perhaps offered through trade organizations/service providers. A focus on the public sector may be desired, in which case, we should partner with the NH Municipal Association and the NH Public Works Academy; and 3) the public.

Task 6: NHDES's work in the 1997 EPA Office of Water EMS project (titled "Voluntary EMS Program", EPA Grant #X991076) was focused to some extent on small-and-medium-sized businesses ("SMEs"). In that work, we concluded that the biggest hurdle to SMEs managing their environmental affairs comprehensively was a lack of basic management skills. Essentially, if an SME does not understand "Plan-Do-Check-Act"/continuous improvement management

tools, application of those tools to environmental concerns is not possible for that SME. Therefore, NHDES will try to find ways to improve basic management skills in NH's SME sector. We anticipate that this will help this class of organizations gain access to programs like Sagamore and PTrack.

Task 7: "Greening the Supply Chain" projects are a current interest at EPA Region 1 and also at NHDES. While it is envisioned that the mentoring project described in Task 6 would be broader than just supply-chain relationships, we intend to use this vehicle to support supply-chain projects. It may turn out that establishing mentoring relationships outside of the supply chain is beyond our reach at this time. However, we hope that this work will leverage better performance and possible adoption of management tools by more and more organizations in New Hampshire.

Task 8: There are several key sub-steps in establishing the envisioned reward-and-recognition program that are described below:

- One is determining the appropriate level and mix of performance, rewards and recognition, and it is expected that the proposed stakeholder group will re-visit NHDES's conclusions from its work on this subject in the 1990s and experience from the national scene since then. Because past findings indicates that there was no "short list" of effective rewards upon which all parties could agree, NHDES's current focus is on a contract-based program at the highest tier. At the time, we found that effective rewards and recognition tends to be company-specific, but we do expect that this question will be re-examined through this grant project. We hope to fold in prioritization towards agreed-upon state or regional environmental goals into this discussion.
- A key sub-step is improving the acceptance of the base concepts within NHDES. This work not only supports NHDES's proposed work, but also facilitates delivery of the already-established incentives at the federal level by EPA for Performance Track.
- It is essential that NHDES staff work cooperatively with the program offices at the state and EPA-Regional level to change goals and targets to allow work related to Performance Track and New Hampshire's program to be credited for program-specific purposes. This is absolutely necessary if NHDES is going to be able to fully deliver such incentives as EPA's "low priority for routine inspections" for members of Performance Track.
- Another important sub-step is establishing a Memorandum of Understanding/Agreement with EPA to allow maximum cooperation between Performance Track and New Hampshire's Environmental Leadership Program. One reason NHDES is interested in establishing a state program is that neither the federal, nor the state program can independently deliver a system of government environmental oversight that allows for differentiation of better "customers" and rewards and recognition of these. In fact, experience has shown that state programs founder on federal requirements, while federal programs are dependent on the states to deliver the incentives and rewards. Both complementary programs need to be in place for maximum effectiveness.
- An issue that must be addressed here, and through the work of the stakeholder group (Task 3), is maintaining fairness for Small to medium-sized Enterprises (SMEs). While there is no theoretical reason why SMEs cannot implement EMSs, they very seldom do so for a variety of institutional reasons. There may be legal barriers to giving rewards and recognitions while functionally excluding the majority of New Hampshire's private sector: the SMEs. The

potential for an SME-specific tier in NH's recognition program will be explored as part of this project. Support to the SME community on management skills in general may be what is needed.

- Currently, the anticipated program tiers are as follows: 1) a tier which is functionally equivalent to the existing Performance Track program that would have more members, and which could potentially be implemented more quickly; 2) a contract-based ("higher") tier which would have fewer members, and would take longer to implement; and 3) an "on-ramp" ("lower") tier which would help companies, particularly the SMEs, slowly gear up for the more rigorous program tiers. This approach will allow the SMEs and those larger companies that may just be starting out to slowly move up to the more rigorous tiers, while at the same time supporting a continuous improvement ethic.

Logic Model:

As an aid to understanding shows the relationships among project activities and major outcomes and decisions, EPA has requested a logic model diagram for the project, which is shown below:

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

Table 2: Logic Model

Resources & Partners	Activities	Outputs *(All activities in this column reported as a project metric)*	Customer Reached	Short Term Outcomes	Intermediate Term Outcomes	Long-Term Outcomes
NHDES Staff State of NH Funds	**Task 1:** Update & publicize NHDES policy on EMSs	New Policy	NHDES Staff Regulated Community Public at large	Increased awareness of EMS's usefulness & the government's approach toward them.	Changes in behavior related to improved environmental performance	Better environmental performance – more likely to be addressed in other activities further down the chart
	Task 2: Update & improve NHDES web space on EMSs	New web materials	NHDES Staff Regulated Community Public at large	Increased awareness of EMS's usefulness & the government's approach toward them.	Contacts to NHDES for information & training (***measure***)	
SIG Grant State of NH Funds Stakeholder group NHDES Staff	**Task 3:** Establish & maintain advisory group	a) Group created b) Meetings held, minutes promulgated c) Recommendations made that affect future activities.	Stakeholder group, NHDES Staff, NH legislature, NH public	Group understands its purpose & mission NHDES understands group's interests, ideas, perspectives	Members can clearly express the understanding (& acceptance) of the utility & need for a 2nd generation environmental program in NH (***report***)	The establishment of a 2nd generation environmental program in NH
SIG Grant State of NH Funds Stakeholder group NHDES Staff Organizations participating in NH's program (possible) contractor	**Task 4:** Provide EMS implementation training for public & private sectors, NHDES staff	Several ½ to one-day training seminars	NHDES & other state NHDES staff Regulated community in the private & public sectors	Increase in organizations' willingness & ability to understand EMS & its benefits and to use this tool. (***measure via survey***) Increase in NHDES staff understanding. (***measure via survey***)	Organizations use EMS tools more often & incorporate them into their culture. (***measure via survey***) Regulators more willing to trust facilities using EMSs. (***measure via survey***	Possible re-prioritization of NHDES resources– ***(attempt to measure by tracking changes in budget and staffing)*** Reduction to threats and damage to environment & public health.

Resources & Partners	Activities	Outputs *(All activities in this column reported as a project metric)*	Customer Reached	Short Term Outcomes	Intermediate Term Outcomes	Long-Term Outcomes
SIG Grant State of NH Funds Stakeholder group NHDES Staff Organizations participating in NH's program (possible) contractor	**Task 5:** Increase consideration of environmental concerns at management schools	Meetings with NH colleges	College faculty Management students	Changes to curriculums. (*measure via survey*)	New graduates entering business fields show greater understanding of how environmental issues can be used to create value for their organizations. *(Measures: beyond time horizon of grant)*	Better economic & environmental performance – more likely to be addressed in other activities further down the chart.
SIG Grant State of NH Funds Stakeholder group NHDES Staff NH SBDC Organizations participating in NH's program (possible) contractor	**Task 6:** Improve management skills in the small business (SME) sector	A detailed strategy describing how to improve management skills in the SME sector. The nature of this strategy is TBD through stakeholder group.	SME community	Increased awareness of the utility of "PDCA" management	More SMEs use "PDCA" methods, up to & incl. ISO 9000 & 14001 registration & Baldridge *(Measures: (beyond time horizon of grant) - **track registrations & Baldridge awards)***	See below
SIG Grant State of NH Funds Stakeholder group NHDES Staff NH SBDC Organizations participating in NH's program	**Task 7:** Encourage mentoring activities, "Greening the Supply Chain"	Possibilities: Support for EPA Greening the Supply Chain project, strategy to encourage mentoring, "how to mentor" book	Small business community as recipients of mentoring. Large businesses incorporating Supply Chain Greening, perhaps in procurement.	Increased awareness of the interdependency of businesses and the need to pay attention to one's supply chain's performance.	More large businesses provide advice & assistance to smaller businesses, leading to better environmental management by the smaller businesses. ***(measure via survey)***	See below

Resources & Partners	Activities	Outputs *(All activities in this column reported as a project metric)*	Customer Reached	Short Term Outcomes	Intermediate Term Outcomes	Long-Term Outcomes
SIG Grant State of NH Funds Stakeholder group NHDES Staff Organizations participating in NH's program NH Public	**Task 8:** Establish multi-tiered reward and recognition program. One tier equiv. To Ptrack	Legislation enacted. Program in place.	NHDES Staff Regulated Community Public at large Other States, EPA regions (use as a model)	Understanding (& acceptance) of the utility & need for a 2nd generation environmental program in NH	Establish program outline, esp'y definition of tiers, entrance & exit criteria and nature of rewards/ Recognition *(report)* Legislation *(report)* ***(Beyond grant timeframe: Members recruited; members advancing into Ptrack from lower tiers TBD)***	Better economic & environmental performance ***(measure via members' performance reports, to be equiv. to exist. Ptrack reports.)***
SIG Grant State of NH Funds Stakeholder group NHDES Staff	**Task 9:** Project Reports	Quarterly and final project reports	EPA staff NH legislature Public at large	Earlier reports influence conduct of project going forward.	Earlier reports influence conduct of project going forward.	Information available to influence others to do similar work.

External Influences:

State and Federal budget constraints may make project impossible.
Leadership changes at appointed level may lead to changes in DES or EPA priorities.
Staff 'inertia' may be impossible to overcome.
Public opinion may make addition of reward-and-recognition programs to DES strategies impossible

Program Benefits & Outcomes

As noted, NHDES proposes to address the actions outlined above on a continuum that extends from small and simple, to larger and more complex. All of these actions are focused on the following goals for NHDES:

- Increasing internal (NHDES) and external (other state agencies, businesses, municipalities, the public) awareness and acceptance of the value of a systematic approach to managing environmental responsibilities;
- Getting improved multi-media management of environmental concerns, whether within traditionally regulated or unregulated areas, throughout the state.
- Broadening the acceptance in the business community, especially for SMEs, of the concept that good environmental performance leads to better economic performance.
- Testing new systems where the recognition and reward of "good" performance produces comparable (and measurable) results to those accomplished through punitive actions for "bad" performance, while at the same time enhancing public involvement, and giving NHDES flexibility in how it allocates limited staff resources for the essential tasks of targeting, inspecting, and enforcing within the regulated community.

Detailed performance measures

The list of outcomes, below, above was extracted from the logic model included above as Table 2. For each of the anticipated outcomes listed below, we anticipate measuring results using the means shown in *underlined italic.* It should be understood that NHDES has explicitly chosen not to measure every outcome; rather, a choice has been made as to the most important outcomes to track and measure.

Anticipated short-term outcomes:

- Increased awareness of the usefulness of systematic management tools, their usefulness in achieving improved environmental and economic importance, and of the government's attitude toward these methods. *Measure via survey of 'regulated parties'* **(Task 4)**
- Increase in NHDES staff understanding of these tools. *Measure via staff survey.* **(Task 4)**
- Changes in college curriculums. *Measure via survey of NH colleges.* **(Task 5)**
- Understanding of the utility and need for "second generation" environmental tools that go beyond the current regulatory system as practiced in the United States. *Information to be extracted out of advisory group meeting minutes and included in project reporting.* **(Task 3)**

Anticipated intermediate-term outcomes:

- Changes in behavior related to improved environmental performance.
- Contacts to NHDES for information and/or training. *Measured/reported from mail/email records and telephone logs.* **(Task 2)**
- Organizations throughout the state use systematic environmental management tools more often, and incorporate them into their culture. *Measure via survey* **(Task 3)**
- Organizations show greater understanding of how environmental issues can be used to create value for their organizations.
- More SMEs use the tools of management science in their operations. *Measure/report via tracking ISO registrations and Baldridge Award participation.* **(Task 6)**
- Regulators and the public begin to develop relationships with organizations that include more trust. *Measure regulators' attitude via survey.* **(Task 4)**
- A "second generation" environmental program (current working title: "NH Sagamore"), based on environmental performance, recognition and rewards, is designed for New Hampshire. *Measure by reporting of decision to proceed with program.* **(Task 8)**

Anticipated longer-term outcomes:

- Better environmental performance by organizations throughout the state. *Measure via the performance reporting of organizations participating in NH Sagamore.* **(Task 8)** It should be understood that the actual performance measures will be chosen by facilities consistent with NH Sagamore guidelines (to be established) and that the measures chosen, in addition to the actual performance reported, will be included in reports to EPA. These reports will be as similar as feasible to reporting required under PTrack.
- The implementation of a "second generation" environmental program, based on environmental performance, recognition and rewards. *Measure by reporting of program implementation.* **(Task 8)**
- Possible re-prioritization of NHDES resources. *Measure via tracking of staff/budget allocations.* **(Task 4)**

NHDES does not anticipate using statistical analysis on this data, beyond simple reporting of totals and averages (means and medians, as appropriate, medians would be used where large 'scatter' of a data set would make means misleading.)

Transferability and Reporting

Quarterly program reports, and a full project report, including environmental outcomes to date, will be prepared and submitted to EPA, as required. We also anticipate that this work will be disseminated through the stakeholder group, through the New England-regional environmental media organizations and the New England Governors' Conference, and through MSWG's and Performance Track's networks. There will also be a press release at the final report stage, and possibly at other project milestones (e.g., filing or the passage of NH legislation). We hope that this will help build the momentum experienced around the country for adding reward-and-recognition programs to the mix of government environmental programs.

Quarterly (and the final) project report will include the following:

- A short summary of the work completed in the reporting period.
- Deliverables, outputs, outcomes, etc. completed in the reporting period.
- Description of progress on completing individual tasks and milestones reached.
- Any changes to the planned project schedule based on events.
- A look forward to the work to be done in the next reporting period.
- A summary of any revisions needed or made to the project work plan and/or QA Plan
- QA reporting as required in the project QA Plan
- Summary information of grant fund expenditures, by budget category.

Public Involvement

Please see the description of Task 3, above. Beyond that NHDES would like to note the following:

Environmental justice concerns are difficult to assess for a project of this nature. Where there are such concerns in the area of a given facility or in the design of programs in general, NHDES will assure full compliance with the letter and the spirit of EPA and NHDES Environmental Justice policies. This would probably take the form of specific ad-hoc stakeholder outreach to address specific issues.

This project will help build lasting change within NHDES, and elsewhere, and will create renewed energy and focus around a cutting edge topic. The attention garnered by this project will hopefully create additional benefits not directly addressed by this proposal. For instance, this project may prove helpful in developing a proposed "Green State Initiative" for state agencies and for advancing sustainability concepts at NHDES. Refer to the DES/EPA PPA, page 26. We hope it will provide evidence that looking beyond media-specific programs can yield better results, and we are prepared to carry the message forward by consulting and/or mentoring with other states.

An additional public involvement aspect to this work is that NHDES expects that organizations participating in NH Sagamore will develop, and/or have, outreach and involvement with their public at least to the extent PTrack participants are required to.

In the mere course of building NH's first Environmental Leadership Program, new, lasting relationships will be forged with the business community and the public, real environmental improvements will be gained in regulated and non-regulated areas, effective partnerships will be created with a diverse set of stakeholders, and a new level of two-way communications and problem-solving will be achieved, both within NHDES, and between NHDES and EPA.

Personnel Qualifications:

The Project Manager, Bob Minicucci, has been involved in "second generation" environmental policy matters on behalf of NHDES since 1995. Specific experience related to the proposed

work includes: 1997 completion of a "Regulatory Barriers to the Implementation of Innovative Environmental Technologies" project; managing NH's contribution to the Office of Water's 1997 EMS pilot project; Environmental Management System (EMS) implementation training at several companies in NH; a leadership role (elected Secretary) in the Multi-State Working Group on Environmental Performance (MSWG - www.mswg.org); an active role as stakeholder-advocate for National Environmental Performance Track, and recent training as a Baldridge examiner (2006, NH). Bob is also the NHDES Assistant Quality Assurance (QA) Manager, and was heavily involved in the design and implementation of NHDES's (EPA-compliant) QA system in 2000. Bob is a graduate of the Worcester (MA) Polytechnic Institute and a licensed professional engineer (NH) with more than 25 years of professional experience.

Immediate project oversight and QA duties rest with Vincent Perelli, who serves as NHDES's QA Manager, as well as the Chief of Planning and Policy in the newly-established Planning and Innovations Section of the Office of the Commissioner. Vince has completed a 40-hour ISO 14001 Lead Auditor Course, as well as Baldridge Examiner training. He is the Secretary of NH Businesses for Social Responsibility (www.nhsbr.org) and holds a Masters in Resource Management and Administration from Antioch New England Graduate School in Keene, NH.

Summary Budget Information:

(For Three-year project period)

Category	Total Project Costs	Proposed State Leverage Funds	Proposed EPA Funds
Staff Salaries			
Benefits			
Travel			
Equipment			
Supplies			
Services Contract			
Other			
Indirect			
TOTAL:			

The proposed State leverage funds listed represent non-federal, in-kind, staff salaries and benefits which will be used to help carry out this project. Various forms attached to this narrative show the proposed budget in greater detail.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OMB CIRCULAR A-87 COGNIZANT AGENCY
NEGOTIATION AGREEMENT

Date: February 17, 2005

State of New Hampshire
Department of Environmental Services
Concord, New Hampshire

Filing Ref: July 8, 2004

The indirect cost rates contained herein are for use on grants and contracts with the Federal Government to which Office of Management and Budget Circular A-87 applies, subject to the limitations contained in the Circular and in Section II, A below.

SECTION I: RATES

Type	Effective Period From	Effective Period To	Rate	Base
Fixed	7/1/2004	6/30/2005	2.98%	(a)

Basis for Application
(a) Direct Salaries and Wages including Fringe Benefits.

Treatment of Fringe Benefits: Fringe Benefits applicable to direct salaries and wages are treated as direct costs.

SECTION II: GENERAL

A. LIMITATIONS: The rates in this Agreement are subject to any statutory and administrative limitations and apply to a given grant, contract or other agreement only to the extent that funds are available. Acceptance of the rates is subject to the following conditions: (1) Only costs incurred by the department/agency or allocated the department/agency by an approved cost allocation plan were included in the indirect cost pool as finally accepted; such costs are legal obligations of the department/agency and are allowable under governing cost principles; (2) The same costs that have been treated as indirect costs have not been claimed as direct costs; (3) Similar types of costs have been accorded consistent accounting treatment; and (4) The information provided by the department/agency which was used to establish the rates is not later found to be materially incomplete or inaccurate by the Federal Government. In such situations the rate(s) would be subject to renegotiation at the discretion of the Federal Government.

State of New Hampshire
Department of Environmental Services
Concord, New Hampshire

B. CHANGES. The fixed rate contained in this agreement is based on the organizational structure and the accounting system in effect at the time the proposal was submitted. Changes in the organizational structure and the accounting system in effect at the time the proposal was submitted. Changes in the organizational structure or changes in the method of accounting for costs which affect the amount of reimbursement resulting from use of the rate in this agreement, require the prior approval of the authorized representative of the responsible negotiation agency. Failure to obtain such approval may result in subsequent audit disallowance.

C. THE FIXED RATE contained in this agreement is based on an estimate of the cost which will be incurred during the period for which the rate applies. When the actual costs for such a period have been determined, an adjustment will be made in the negotiation following such determination to compensate for the difference between the cost used to establish the fixed rate and that which would have been used were the actual costs known at the time.

D. NOTIFICATION TO FEDERAL AGENCIES: Copies of this document may be provided to other Federal agencies as a means of notifying them of the agreement contained herein.

E. SPECIAL REMARKS: None

ACCEPTANCE

By the State Agency:

Michael P. Polin
(Signature)

Michael P. Polin
(Name)

Commissioner
(Title)

NH Dept of Environmental Service
(Agency)

2/28/05
(Date)

By the Federal Agency:

Linear C. Cherry
(Signature)

Linear C. Cherry, Cost Negotiator
Financial Analysis and Rate
Negotiation Service Center
U.S. Environmental
Protection Agency
February 17, 2005

Negotiated by: Linear C. Cherry
Telephone: (202) 564-4403

Form Approved OMB N0:2030-0020 Approval Expires 12/31/05

EPA KEY CONTACTS FORM

thorized Representative: *Original awards and amendments will be sent to this individual for review and acceptance, unless otherwise ated.*

*** Name:**	Mr. Vincent R. Perelli
Title:	Chief of Planning and Policy
*** Complete Address:**	P.O. Box 95 29 Hazen Drive Concord NH 03302-0095 USA
*** Phone Number:**	(603) 271-8989
Fax Number:	(603) 271-2867
Email:	vperelli@des.state.nh.us

Payee: *Individual authorized to accept payments.*

*** Name:**	Mrs. Pamela Matott
Title:	Grants Management Superviser -- Accountant IV
*** Complete Address:**	P.O. Box 95 29 Hazen Drive Concord NH 03302-0095 USA
*** Phone Number:**	(603) 271-2413
Fax Number:	(603) 271-2867
Email:	pmatott@des.state.nh.us

ministrative Contact: *Individual from Sponsored Programs Office to contact concerning administrative matters (i.e., indirect cost rate utation, rebudgeting requests etc).*

*** Name:**	Mrs. Pamela Matott
Title:	Grants Management Superviser -- Accountant IV
*** Complete Address:**	P.O. Box 95 29 Hazen Drive Concord NH 03302-0095 USA
*** Phone Number:**	(603) 271-2413
Fax Number:	(603) 271-2867
Email:	pmatott@des.state.nh.us

Project Manager: *Individual responsible for the technical completion of the proposed work.*

*** Name:**	Mr. Robert P. Minicucci
Title:	Special Projects Mgr./Civil Engineer V
*** Complete Address:**	P.O. Box 95 29 Hazen Drive Concord NH 03302-0095 USA
*** Phone Number:**	(603) 271-2941
Fax Number:	(603) 271-2867
Email:	rminicucci@des.state.nh.us

orm 5700-54 (Rev 4-02)

The State of New Hampshire
Department of Environmental Services

Michael P. Nolin
Commissioner

January 6, 2006

Gerald J. Filbin, Ph.D., Director
Innovative Pilots Division (1807T)
Office of Policy, Economics, and Innovation
US Environmental Protection Agency
1200 Pennsylvania, Ave., NW
Washington, DC 20460

Re: NH Department of Environmental Services (DES) Letter of Support for State Innovations Grant: "Encouraging Superior Environmental Performance Through Management Systems, Recognition, and Rewards"

Dear Mr. Filbin:

Thank you for the opportunity to apply for, and win, a competitive 2005 State Innovations Grant. I am writing in support of DES's final proposal titled, "Encouraging Superior Environmental Performance Through Management Systems, Recognition, and Rewards." This proposal, which was selected by senior leadership through a competitive internal review process, is well aligned with key goals and objectives in both EPA's and DES's strategic plans. Specifically, building a NH-based Environmental Leadership Program directly supports EPA sub-objective 5.2.3 - Business and Community Innovation: "Through 2008, achieve measurably improved environmental performance through sector-based approaches, performance-based programs, and assistance to small business," as well as several objectives in DES's strategic plan, particularly 8.3.3, "..... develop and implement a program to encourage all organizations to move toward sustainability and fully institutionalize an environmental ethic through the use of formal environmental management systems."

In addition to meeting EPA and DES goals and objectives, this grant opportunity is timely in that the *2005-2007 NHDES/USEPA Performance Partnership Agreement* (PPA), signed in March 2005, includes an "Area for Collaboration" dedicated to a broad array of environmental management system-based initiatives, one of which is the development of an Environmental Leadership Program. Currently, there is management and staff enthusiasm and interest in this area at DES, and an extensive network of state and federal environmental management system and environmental leadership program experts to tap. Other expected benefits include new, lasting relationships with the business community, real environmental improvements in regulated and non-regulated areas, and effective partnerships with a diverse set of stakeholders, especially as a spin-off to a planned Sustainable Business and Government Roundtable in March 2006.

The State Innovation Grant provides critical financial resources which will afford DES staff the time necessary to build the program as envisioned in strategic priorities, the current PPA, and in the detailed project work plan. DES appreciates the opportunity to work with EPA, its stakeholders, and others in the development of NH's first formal Environmental Leadership Program. If you have any questions or concerns regarding DES's proposal, please contact me at (603) 271-4974 or mwalls@des.state.nh.us.

Sincerely,

Michael J. Walls, Esq.
Assistant Commissioner

cc: Ira Leighton, EPA New England
Jean Holbrook, EPA New England
Robert Minicucci, DES
Vincent Perelli, DES

P.O. Box 95, 29 Hazen Drive, Concord, New Hampshire 03302-0095
Telephone: (603) 271-3503 • Fax: (603) 271-2867 • TDD Access: Relay NH 1-800-735-2964
DES Web site: **www.des.nh.gov**

Washington, DC 20460

Preaward Compliance Review Report for All Applicants Requesting Federal Financial Assistance

FORM Approved
OMB Number: 2090-0014
Expiration Date: 04/30/2006

te: Read Instructions before completing form.

I. A. Applicant (Name, City, State)

* Name: State of New Hampshire - Dept. of Environmental Services

* City: Concord

* State: NH

B. Recipient (Name, City, State)

Prefix: Mr.

* First Name: Robert

Middle Name: P.

* Last Name: Minicucci

Suffix Name:

* City: Concord

* State: NH

C. EPA Project No.

*** II. Brief description of proposed project, program or activity.**

The title of this project is "Encouraging Superior Environmental Performance Through Management Systems, Recognition, and Rewards." The purpose of the project is to address concerns raised regarding the efficacy of traditional environmental policy tools in solving persistent and emerging environmental issues. Today, many innovative tools are available, in addition to the traditional regulatory approaches. This project provides the New Hampshire Department of Environmental Services with the resources necessary to develop several programs that use these new tools, especially a performance-based reward and recognition approach mirroring US EPA's National Environmental Performance Track Program.

*** III. Are any civil rights lawsuits or complaints pending against applicant and/or recipient?** ○ Yes ● No

If yes, list those complaints and the disposition of each complaint.

*** IV. Have any civil rights compliance reviews of the applicant and/or recipient been conducted by any Federal agency during the two years prior to this application for activities which would receive EPA assistance?** ○ Yes ● No

If yes, list those compliance reviews and status of each review.

*** V. Is any other Federal financial assistance being applied for or is any other Federal financial assistance being applied to any portion of this project program or activity?** ○ Yes ● No

If yes, list the other Federal Agency(s), describe the associated work and the dollar amount of assistance.

VI. If entire community under the applicant's jurisdiction is not served under the existing facilities/services, or will not be served under the proposed plan, give reasons why.

*** VII. Population Characteristics**	**Number of People**
1. A. Population of Entire Service Area	1,162,000
B. Minority Population of Entire Service Area	35,000
2. A. Population Currently Being Served	0
B. Minority Population Currently Being Served.	0
3. A. Population to be Served by Project, Program or Activity	0
B. Minority Population to be Served by Project, Program or Activity	0
4. A. Population to Remain Without Service	0
B. Minority Population to Remain Without Service	0

FORM Approved
OMB Number: 2090-0014
Expiration Date: 04/30/2006

*** VIII. Will all new facilities or alterations to existing facilities financed by these funds be designed and constructed to be readily accessible to and usable by handicapped persons?** ● Yes ○ No

no, explain how a regulatory exception (40 CFR 7.70) applies.

*** IX. Give the schedule for future projects, programs or activities (or of future plans), by which services will be provided to all beneficiaries within applicant's jurisdiction. If there is no schedule, explain why.**

X. I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

A. Signature of Authorized Official

Vincent Perelli

B. Title of Authorized Official

Chief of Planning and Policy

C. Date

01/12/2006

For the U.S. Environmental Protection Agency

○ Approved ○ Disapproved

Authorized EPA Official

Date

orm 4700-4 (Rev. 1/90) Previous editions are obsolete.

g Number: GRANT00073559

New Hampshire Department of Environmental Services

Encouraging Superior Environmental Performance Though Management Systems, Recognition and Rewards

Quality Assurance Project Plan

New Hampshire Department of Environmental Services
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

Project Manager:
Robert P. Minicucci II, PE
NHDES
PO Box 95
Concord, NH 03302-0095
603-271-2941
RMINICUCCI@DES.STATE.NH.US

PLEASE DO NOT PHOTOCOPY THIS DOCUMENT
Distribution of this document is controlled in order to avoid having multiple versions of the document in circulation. Please contact Vincent Perelli (Quality Assurance Manager) to obtain additional copies or add individuals to the distribution list.

Abstract: This document details a quality assurance plan to guide the successful implementation of NHDES's project "Encouraging Superior Environmental Performance Though Management Systems, Recognition and Rewards" which is intended to encourage systematic environmental management for better environmental performance, within and outside of those areas traditionally regulated, and specifically addresses NHDES's intentions to establish a New Hampshire-based Environmental Leadership Program.

A PROJECT MANAGEMENT

A1. Approval Sheet

Robert P. Minicucci II, PE NH Department of Environmental Services Project Manager	Date
Vincent R. Perelli NH Department of Environmental Services Quality Assurance Manager/Chief of Planning & Policy	Date
Nora J. Conlon PhD US EPA Region 1 Quality Assurance Officer	Date
Jean Holbrook US EPA Region 1 Project Officer	Date

A2. Table of Contents

A PROJECT MANAGEMENT 2
A1. Approval Sheet 2
A2. Table of Contents 3
A3. Distribution List 4
A4. Project/Task Organization 4
A5. Problem Definition/Background 6
A6. Project/Task Description 8
A7. Quality Objectives and Criteria 11
A8. Special Training/Certification 13
A9. Documents and Records 13
B DATA GENERATION AND ACQUISITION 15
B1. Experimental Design 15
B2. Sampling/Experimental Methods 17
B3. Sample Handling and Custody 17
B4. Analytical Methods 17
B5. Quality Control (QC) 17
B6. Instrument/Equipment Testing, Inspection, and Maintenance 18
B7. Instrument/Equipment Calibration and Frequency 18
B8. Inspection/Acceptance for Supplies and Consumables 18
B9. Non-Direct Measurements (i.e., Secondary Data) 18
B10. Data Management 20
C ASSESSMENT/OVERSIGHT 21
C1. Assessment and Response Actions 21
C2. Reports to Management 21
D DATA REVIEW AND EVALUATION 22
D1. Data Review, Verification and Validation Criteria 22
D2. Verification and Validation Methods 22
D3. Evaluating Data in Terms of User Needs 22

List of Tables

Table 1: Distribution List ..... **Error! Bookmark not defined.**
Table 2: Project Implementation Personnel 5
Table 3: Schedule of Major Project Tasks 9
Table 4: Secondary Data 19
Table 5: Project Status Reports 22

List of Figures

Figure 1: Project Organizational Chart 6

A3. Distribution List

The following individuals will receive a copy of this Quality Assurance Project Plan (QAPP) and any subsequent revisions:

Name	Project Title or Position	Organizational Affiliation	PT/O	Contact Information
Robert Minicucci	Project Manager	NHDES[1]	PT	rminicucci@des.state.nh.us
Vincent Perelli	NHDES QA Manager	NHDES	PT	vperelli@des.state.nh.us
Jean Holbrook	EPA Project Officer	US EPA Reg 1[2]	PT	Holbrook.Jean@epa.gov
Nora Conlon	EPA Reg 1 QA Officer	US EPA Reg 1	O	Conlon.Nora@epa.gov
Gerald Philbin	EPA/NCEI QA Officer	US EPA HQ	O	Philbin.Gerald@epa.gov
Sherri Walker	EPA/NCEI/State Innovations Grant Director	US EPA HQ	O	Walker.Sherri@epa.gov

PT = Project team member, O = Observer

Additional copies of the QAPP may be requested from the NHDES QA Manager. As additional parties, such as the stakeholder group described below, become involved with the project, they will be added to Table 1 and given copies of the QAPP. It is anticipated that a read-only version of this QAPP will be posted at www.des.nh.gov.

A4. Project/Task Organization

Personnel involved in project implementation are listed in Table 2. Following the table, the responsibilities of key personnel are enumerated. Lines of authority and communication are shown in the organization chart in Figure 1.

[1] New Hampshire Department of Environmental Services
[2] United States Environmental Protection, Region 1 (located in Boston, Massachusetts)

Table 1: Project Implementation Personnel

Name	Role in Project, Title, Organizational Affiliation	Contact Information
Robert Minicucci	NHDES Project Manager,	603-271-2941; RMINICUCCI@DES.STATE.NH.US
Vincent Perelli	NHDES QA Manager (Chief of Planning & Policy)	603-271-8989; VPERELLI@DES.STATE.NH.US
Michael Walls	Project Oversight (NHDES Assistant Commissioner)	603-271-4979; MWALLS@DES.STATE.NH.US
Jean Holbrook	EPA Project Officer	617-918-1816 HOLBROOK.JEAN@EPA.GOV

The Project Manager will be responsible for the following activities:

- Assure completion of all tasks in the work plan
- Conduct outreach with potential participants and stakeholders
- Oversee participant enrollment, data collection, and data analysis tasks
- Issue quarterly and annual reports to the United States Environmental Protection (EPA)

The QA Manager will be responsible for the following activities:

- Maintain QAPP and amend as needed
- Distribute QAPP and maintain distribution list
- Conduct readiness reviews

A contractor, to be determined, will be responsible for the following planned activities:

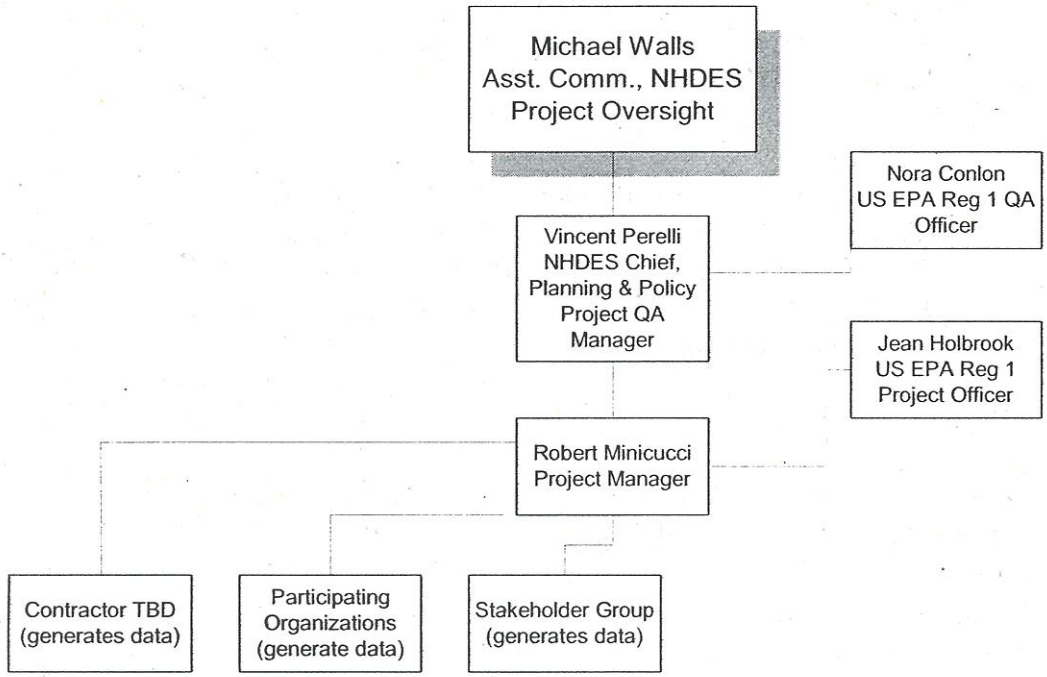
- Provide training to several different audience sets
- Assist in developing a strategy, or possibly carry out this strategy, to improve management skills in the SME sector.
- Possible meeting facilitation and./or coordination services.

Project partners are to be determined, but are considered herein to be members of the stakeholder group to be established and participants in the NH-based environmental leadership program (working title: NH Sagamore). These partners are presumed to be responsible for the following activities:

- Stakeholder Group: Provide expertise and advice to NHDES related to establishment of a NH-based environmental leadership program.
- Participants: Provide information about their environmental performance and other organizational matters over time.

At the time of program initiation, NHDES anticipates that all data used in this project will be considered "secondary" as defined in EPA's Quality Assurance System.

Figure 1: Project Organizational Chart



A5. Problem Definition/Background

Rationale for initiating the project

Concerns about persistent and emerging environmental problems have sparked debate about the efficacy of traditional environmental policy tools. Today, many instruments are available – from traditional performance- and technology-based regulatory approaches, to innovative government programs, to new private sector initiatives such as environmental performance reporting and environmental management systems. The subject project is for NHDES to develop several programs that use these new instruments, especially including a performance-based reward and recognition approach mirroring US EPA's National Environmental Performance Track (Ptrack).

Objectives of the project

The project is designed to deliver the measurable short-term, intermediate, and long-term outcomes shown below, and enables NHDES to make the decisions listed below the anticipated outcomes. It should be noted that NHDES, in coordination with the EPA Project Officer, has explicitly chosen not to measure every outcome associated with the work; rather, a choice has been made as to the most important outcomes to track and measure (See Sec. B1).

Anticipated shorter-term outcomes:

- Increased awareness of the usefulness of systematic management tools, their effectiveness in achieving improved environmental and economic performance, and of the government's attitude toward these methods.
- Increase in NHDES staff understanding of these tools.
- Changes in college curriculums.
- Understanding of the utility and need for "second generation" environmental tools that go beyond the current regulatory system as practiced in the United States.

Anticipated intermediate-term outcomes:

- Changes in behavior related to improved environmental performance.
- Outside requests to NHDES for information and/or training.
- Organizations throughout the state use systematic environmental management tools more often, and incorporate them into their culture.
- Organizations show greater understanding of how environmental issues can be used to create value for their organizations.
- Colleges and universities in the state begin to add environmental issues to their business/management curricula.
- More SMEs use the tools of management science in their operations.
- Regulators and the public begin to develop relationships with organizations that include more trust.
- A "second generation" environmental program (current working title: "NH Sagamore"), based on environmental performance, recognition and rewards, is designed for New Hampshire.

Anticipated longer-term outcomes:

- Better environmental performance by organizations throughout the state.
- The implementation of a "second generation" environmental program, based on environmental performance, recognition and rewards.
- Possible re-prioritization of NHDES resources.

Anticipated decisions, to be based on data collected

- Will NH Sagamore be implemented?
- What rewards and recognition can and/or should be implemented and/or expanded to help organizations achieve the highest possible environmental performance?
- Based on the experience of this project, how should NHDES plan to modify NH Sagamore? (e.g., what incentives are most effective?)
- Should NHDES further modify its traditional regulatory approach? How far should NHDES modify regulatory oversight of facilities that achieve similar benchmarks?

Project activities, the relationships between them, and the outcomes and decisions anticipated are described in the project work plan dated January 30, 2006.

Regulatory information, applicable criteria and action limits

Only facilities with a satisfactory history of regulatory compliance will be allowed to participate in the NH Sagamore program. At this time, NHDES anticipates that "satisfactory regulatory compliance" will be defined in the same way EPA's Ptrack does, as will criteria for exiting the program. See http://www.epa.gov/performancetrack/program/sustain.htm.

A6. Project/Task Description

Project overview

NHDES proposes to do the following tasks to achieve the goals below:

- Update NHDES's policies
- Upgrade NHDES's website services by increasing presence of EMS and environmental leadership information.
- Establish and maintain a stakeholder advisory group
- Offer training to various target audiences in systematic environmental management
- Increase consideration of environmental concerns in college/university business/management curricula.
- Take actions to improve management skills in the SME sector
- Encourage larger organizations to mentor smaller ones
- Design and establish a multi-tier reward & recognition program to encourage better environmental performance.

NHDES believes that achieving these tasks will help it to reach the following goals:

- Increase internal and external awareness and acceptance of the value of a systematic approach to managing environmental responsibilities;
- Promote and achieve better environmental performance in regulated areas (*e.g.,* air emissions, water quality, hazardous waste generation, etc);
- Promote and achieve better environmental performance in areas not traditionally regulated (*e.g.,* energy use, water consumption, habitat protection, etc); and
- Re-allocate limited NHDES resources based on need and risk by building a system of differentiating organizations on a performance basis.

Two classes of data will be used to measure how well these goals are achieved: surveys and facility reports.

Project summary and work schedule

This project's major tasks and timetable are outlined in the table below.

Note that **bolded** dates indicate a project milestone.

Table 2: Schedule of Major Project Tasks

	Task Name	Task Description	Start Date	End Date
0	QAPP	Complete project planning by submission (and approval) of QAPP.	July 1, 2006	**Aug. 15, 2006**
1	Policy	Update and publicize NHDES' policy on encouraging systematic environmental management.	Aug. 1, 2006	**Sept. 30, 2006**
2	Website	Establish enhanced NHDES website resources for EMS-related information.	Oct. 1, 2006	**Nov. 1, 2006**
3.1	Stakeholder Group established	Establish and maintain an Advisory/ Stakeholder group. Re-establishes previous group that was active in 1997–2000.	**Group established by Nov. 1, 2006**	Ongoing throughout grant period.
3.2	Stakeholder Group maintained	Maintain Advisory/ Stakeholder group. May morph into a NH Sustainable Business Roundtable. Meetings anticipated to be quarterly or tri-annual through grant period.	**First meeting anticipated by Dec. 1, 2006**	Ongoing throughout grant period.
4.1	Strategy & procurement for EMS Training	With advisory group, establish strategy and procure contractor(s) for EMS training.	**Strategy chosen by Jan. 1, 2007**	**Contractor procured by July 1, 2007**
4.2	Deliver EMS Training	Offer training in EMS implementation, separately for public and private sectors.	**First training delivered by Sept. 1, 2007**	**Training seminars completed by July 1, 2008**
5	Increase Environmental Content of NH College/University Management School Curricula	Meet with NH colleges and universities, with an aim of achieving curriculum changes.	Initial meetings by August 1, 2007	Check for curriculum changes by January 1, 2009
6.1	SME Management	With advisory group, develop strategy to improve management skills in the SME sector.	**Strategy established by July 1, 2007**	See 6.2, below
6.2	SME Management	Take actions, per strategy established in 5.1, to improve management skills in the SME sector.	**Aug. 1, 2007.**	Anticipated to be end of grant period

Table 2: Schedule of Major Project Tasks

	Task Name	Task Description	Start Date	End Date
7.1	Mentoring strategy	With advisory group, establish strategy to encourage larger organizations to mentor smaller ones. May include "greening the supply chain" projects, but not necessarily limited to this area.	**Strategy in place by July 1, 2007**	See 7.2, below
7.2	Mentoring activities	Implement mentoring strategy established in 6.1	**Sept. 1, 2007**	Ongoing throughout grant period
8.1	NH Environmental Sagamore Design	With advisory group input/feedback, design a multi-tiered Reward and Recognition Program, one tier of which would be equivalent to the existing Ptrack. Current working title "NH Environmental Sagamore Program." (NH Sagamore). Design to include entry & exit criteria.	Start Oct. 1, 2006	**July 1, 2007**
8.2	Sagamore Support	a) Obtain final NHDES management approval to implement NH Sagamore. b) Write initial program "manual" c) Propose legislation	**a) Aug. 1, 2007** **b) Sept. 1, 2007** **c) Jan. 1, 2008**	**Legislation, possibly modeled on NH RSA 125:C-6a in 2008 session**
83	Sagamore implementation	a) Publicize program b) Recruit members c) Admit members d) Obtain members' performance reports on environmental performance in regulated and un-regulated areas.	a) Sept. 1, 2007 **b) April 1, 2008** **c) October 1, 2008** d) **May 1, 2009**	No end date anticipated. Grant will expire while program goes on.
9	Project Reports	Quarterly and final Project Reports.	**Sept. 30, 2006**	**Sept. 30, 2009**

Notes to Table 3:
a) This Table was intended to be consistent with Table 1 in the January 30, 2006 grant workplan, but the actual start date was not known when the workplan was prepared. This Table uses July 1, 2006 as a starting date, which complies with the date of formal acceptance of the grant by the NH Executive Council, which occurred June 21, 2006.
b) Some dates for tasks 8.2 & 8.3 were changed from those in the work plan to better reflect legislative timetables.

Geographic focus

Facilities from every part of the state are hoped to participate. The actual distribution of facilities will be described in reports that NHDES prepares on program results.

Resource and time constraints

Unknown at this time.

A7. Quality Objectives and Criteria

NHDES recognizes the importance of ensuring that data are of sufficient quality to meet the needs of the project. NHDES is committed to collecting and obtaining data of the highest quality possible within the constraints of project resources. Data quality can be characterized in terms of precision, bias, representativeness, completeness, comparability, and sensitivity. These characteristics are termed data quality indicators (DQIs). All data gathered in this project will be considered 'secondary' data in that the data will be gathered by parties other than DES, but the data will be gathered and otherwise processed, to the maximum extent possible, in accordance with this QAPP.

Two types of data are involved: the results of surveys to be prepared by NHDES and facility performance reports that would be submitted to NHDES by organizations participating in the proposed NH Sagamore program.

For the facility-reporting portion of the proposed NH Sagamore program, as a general rule, NHDES will gather and review the data in the same manner as EPA's Ptrack program. See http://www.epa.gov/performancetrack/program/report.htm.

Precision/Accuracy

As data used will be secondary data, there are few concerns with precision or accuracy, per se. For secondary data, NHDES will review for reasonableness and consistency, as is done by EPA's Ptrack program.

Participant facilities or other data providers will be required to document their anticipated, and actual, data collection methods. NHDES will reserve the right to review this documentation to ensure high-quality data, and to judge the quality of data already collected.

Bias

For survey-based data, the wording of data collection instruments like surveys and reporting forms will be reviewed by at least two NHDES staff (the minimum being the Project Manager & the NHDES QA Manager), and possibly members of the stakeholder advisory group and/or an NHDES contractor, as appropriate, to remove ambiguity and maximize usability.

For facility-reporting data, to reduce concerns about facility self-reporting bias, the NHDES will require facility-specific environmental performance goals, data collection procedures, and the choice of normalization factors to be agreed upon before the facility begins to collect data. In its initial review of the facility's performance goals, the NHDES will check for signs of potential cross-media transfers or double counting of environmental improvements. Although facility results will be self-reported, NHDES anticipates that a pre-entry interview and site visit or inspection will be conducted for facilities who want to participate in NH Sagamore, in part to minimize the impact of potential self-reporting bias.

To address possible concerns about bias in the NHDES's own reporting of project results, progress reports and the final project report will describe potential biases in the data and justify all conclusions reached on the basis of project data, and project data will be open to public EPA inspection for ten (10) years.

Representativeness

To ensure that facility data are representative of overall facility performance, facilities will be required to commit to and measure against facility-wide goals rather than process-specific goals.

The information collected under this project will not be considered to be representative of the overall universe of which any given facility is a member. NHDES is aware that facilities that participate in such programs are to a large extent self-selected members of one end of a range of performance characteristics. NHDES will characterize the information collected and reported during this project with this in mind.

Completeness

For survey-based data, completion or return rates will be reported and considered during analysis and presentation of any conclusions. When other types of data used for analysis are incomplete, the potential impact of their incompleteness on the analysis will be described in all relevant reports.

For facility-reporting data, NHDES intends to work with participating facilities to move toward a goal that information reported by the facilities represents a fair and complete picture of the facility's environmental impact and performance. For example, if a facility chooses to report on its water discharges, NHDES will work with the facility to ensure that the information reported for water discharges reflects a complete picture of the facility's discharges.

Comparability

The most important comparisons to be made in this project are between baseline data and follow-up data from individual facilities.

For survey-based data, NHDES anticipates using surveys in pairs – baseline and follow-up – to a large extent.

For facility-reporting data, NHDES anticipates that both absolute and normalized data will be used, as appropriate. NHDES will assist facilities to choose appropriate normalization factors. The normalization guidance set by EPA's Ptrack, which is available at http://www.epa.gov/performancetrack/PTNormalization_3_7_041.pdf, will be used to guide the choice and use of normalization factors.

Data from different sources will not be combined unless they were collected in a comparable manner.

Sensitivity

For environmental measurements in facility-reporting data (and not for survey responses), the NHDES will encourage or require (depending on existing legal authorities) facilities to meet the sensitivity standards achievable by the use of EPA-approved analytical methods with proper sample collection and handling protocol.

A8. Special Training/Certification

To the extent needed or requested, NHDES and, applicable contractors and other partners will develop and deliver training sessions regarding data-related issues to key parties if requested or if the QA Manager determines a need.

NHDES, contractors, mentor facilities, or non-profit partners will provide training as necessary or appropriate.

The Project Manager and the NHDES QA Manager are responsible for ensuring that all personnel involved with data generation (including NHDES personnel, contractors, and partners) have the necessary QA training to successfully complete their tasks and functions. The Project Manager and NHDES QA Manager will document attendance at all training sessions.

A9. Documents and Records

Project data reporting--format and content

Reports and forms include:

- Questionnaires and surveys
- Application form for facilities that apply to NH Sagamore
- Facility performance report
- Reports analyzing member characteristics, performance commitments, and results

Other documents/records

Other documents and records to be produced by the project include:

- Program web site
- Amended QAPP

- Readiness reviews
- Data handling reports
- Quarterly progress reports to EPA
- Project final report

Storage of project information

While the project is underway, project information will be stored in a filing cabinet at NHDES headquarters, and on NHDES's secure computer network, according to the State of New Hampshire data management plan and the NHDES QMP. Upon completion of the project, paper records, photographs, and audio-visual material will be retained for ten (10) years at NHDES headquarters. Electronic records will be stored indefinitely on the NHDES's main computer network.

Backup of electronic files

Existing State of New Hampshire and NHDES electronic back-up procedures will be followed.

QAPP (and other document) preparation and distribution

This QAPP has been written to conform to the format described in the United States Environmental Protection NHDES publication *EPA Requirements for Quality Assurance Project Plans* dated March 2001 (QA/R-5). The QAPP, with the work plan for the project, shall govern the operation of the project at all times. Each responsible party listed in Section A4 shall adhere to the procedural requirements of the QAPP and ensure that subordinate personnel do likewise.

This QAPP shall be reviewed at least annually to ensure that the project will achieve all intended purposes. All the responsible persons listed in Section A4 shall participate in the review of the QAPP. In addition, it is expected that from time to time ongoing and perhaps unexpected changes will need to be made to the project. The Project Manager shall authorize all changes or deviations in the operation of the project. Any significant changes will be noted in the next progress report to EPA (see Element C2), and shall be incorporated into an amended QAPP. Changes will be made only if permitted in the approved workplan and award documents. If it appears necessary to go beyond those limits the Project Manager will initiate discussions with EPA on how, or if, the changes desired can be achieved.

The Project Manager, under the direction of the NHDES Quality Assurance Manager, is responsible for updating the QAPP, documenting the effective date of all changes made in the QAPP, and distributing new revisions to all individuals listed in Table 1, Section A3, whenever a substantial change is made. The Project Manager will distribute the QAPP by email, or by other means if that is not possible, and attempt to retrieve outdated versions while distributing revised versions. Copies of each revision will be numbered, to make retrieval of outdated versions easier. The Quality Assurance Manager and the Project Manager, for NHDES; and the Project Officer and Region 1 QA Officer, for EPA, will review and approve all updates.

B DATA GENERATION AND ACQUISITION

B1. Experimental Design

Detailed performance measures

For each of the anticipated outcome listed below, we anticipate measuring results using the means shown in *underlined italic.* It should be noted that NHDES, in coordination with the EPA Project officer, has explicitly chosen not to measure every outcome associated with the work and/or listed on the workplan; rather, a choice has been made as to the most important outcomes to track and measure.

- Increased awareness of the usefulness of systematic management tools, their effectiveness in achieving improved environmental and economic performance, and of the government's attitude toward these methods. *Measure via survey of 'regulated parties' and NHDES staff.*
- Increase in NHDES staff understanding of these tools. *Measure via staff survey.*
- Changes in college curriculums. *Measure via survey of NH colleges.*
- Understanding of the utility and need for "second generation" environmental tools that go beyond the current regulatory system as practiced in the United States. *Information to be extracted out of advisory group meeting minutes and included in project reporting.*

Anticipated intermediate-term outcomes:

- Changes in behavior related to improved environmental performance.
- Outside requests to NHDES for information and/or training. *Measured/reported from mail/email records and telephone logs.*
- Organizations throughout the state use systematic environmental management tools more often, and incorporate them into their culture. *Measure via survey*
- Organizations show greater understanding of how environmental issues can be used to create value for their organizations.
- More SMEs use the tools of management science in their operations. *Measure/report via tracking ISO registrations and Baldridge Award participation.*
- Regulators and the public begin to develop relationships with organizations that include more trust. *Measure NHDES staff attitude via survey.*
- A "second generation" environmental program (current working title: "NH Sagamore"), based on environmental performance, recognition and rewards, is designed for New Hampshire. *Measure by reporting of decision to proceed with program.*

Anticipated longer-term outcomes:

- Better environmental performance by organizations throughout the state. *Measure via the performance reporting of organizations participating in NH Sagamore.*
- The implementation of a "second generation" environmental program, based on environmental performance, recognition and rewards. *Measure by reporting of program implementation.*
- Possible re-prioritization of NHDES resources. *Measure via tracking of staff/budget allocations.*

The list above was extracted from the logic model included in the January 30, 2006 project work plan. NHDES does not anticipate using statistical analysis on this data, beyond simple reporting of totals and averages (means and medians, as appropriate, medians would be used where large 'scatter' or the existence of outliers in a data set would make means misleading. When in doubt, both medians and means will be reported.)

NHDES is not anticipating specfic outcomes, but intends to try various ideas and observe what happens. "Success" would be determined by acceptance by various audiences (again, Table 2, 1/30/06 project work plan), and by environmental performance. In the latter category, any quantity of (for example) waste eliminated or energy use reduced is a success. This QAPP will be revised as needed to reflect the implementation of NH Sagamore & membership/performance commitments of various organizations therein.

Regarding performance reporting from participants in the NH Sagamore, normalized baseline and follow-up results will be compared to determine performance improvements at each participating facility. In each medium, results from multiple facilities may be combined to provide annual program-wide results, if three or more facilities within a relevant geographical region or business sector participate. Some results, such as energy use, may be aggregated on a state-wide basis, depending on participation.

Implementation

NHDES has not projected an estimated of number of participants related to any of the work tasks. However, participation is expected to increase from year to year. For the NH Sagamore program, if implemented, NHDES will use the same recruitment/enrollment criteria as EPA's Ptrack program. NHDES will not limit participation to a single industry or sector, rather, wide representation is envisioned, especially beyond the manufacturing sector. In some cases, particularly for the EMS training, the product will be tailored to different customer groups, e.g., EMS training for the public sector will be different from that for the private sector. The number of participants will not be capped. NHDES does not anticipate that participants will be representative of the larger community of facilities NHDES seeks to influence, but rather representative of those who are already, or who already want to be, high environmental achievers. Provisions for facilities to withdraw or be dismissed from the program will be the same as EPA's Ptrack program.

The stakeholder group referenced in task 3 (ref: Table 3 in Sec. A6) will be recruited from as wide a range of parties as possible; for credibility NHDES believes that government, NGO, business, and academic interest will all have to be represented.

The demands made of, and the incentives offered to, facilities that may participate in NH Sagamore will be guided by principles, but these principles are yet to be determined, by the stakeholder group and NHDES. NHDES does anticipate however, meeting some base principals such as, "incentives are only given for *exceeding* legal requirements, not for meeting them."

Project data collection is described elsewhere in this QAPP. The Ptrack program performance reporting form, which NHDES intends to mimic to the extent possible, is available at http://www.epa.gov/performancetrack/program/2003APRrevised_0104.pdf.

Like all parts of this QAPP, this section will be amended as the project progresses, more specific information becomes available, and objectives and methods are refined.

B2. Sampling/Experimental Methods

No use of primary data is anticipated. Data used, apart from simple listing and reporting of administrative issues such as number of phone calls, numbers of applicants, etc. will be considered secondary.

Surveys will be heavily used in this project. Survey forms will be prepared in accordance with general professional standards. NHDES may procure contractor services as mentioned previously and/or work with the University of New Hampshire's Survey Center (http://www.unh.edu/survey-center/) for assistance, or will use the expertise of NHDES staff to produce surveys that will meet the desired goals. Criteria for survey questions and forms include such characteristics as: user-friendly; understandable; easy to complete; allow verification of information where possible; and neutral, in that leading questions will be avoided. Surveys will be tailored to the appropriate users.

B3. Sample Handling and Custody

N/A

B4. Analytical Methods

N/A

B5. Quality Control (QC)

Incoming secondary data will be self-certified by the party generating it, and checked by NHDES or its contractor for reasonableness and consistency. NHDES's Quality Management Plan (QMP), and procedures established by EPA's Ptrack program will be followed as applicable. Although this may not occur during the grant period, NHDES anticipates staff doing

follow-up site visits at a rate at least equaling that of EPA's Ptrack program (10%, as a goal), in part to verify the self-reported information.

Crosschecking data

Application forms and other incoming data will be examined by NHDES staff to identify potential problems or inadequacies in the facility's commitments or its monitoring strategies, such as potential cross-media transfers, intra-facility transfers (if a performance commitment is for a subset of operations, not the entire facility), and double-counting of environmental improvements. If possible, primary data collection forms (see Section A9) will be designed in such a way as to allow internal crosschecking of data by comparing answers of different questions to each other, and such crosschecking will be automated during electronic entry of data, if possible. Errors caught during crosschecking will be flagged and corrected, to the extent possible, in consultation with data collection staff and facility managers.

Data anomalies

NHDES staff or contractor, as appropriate, will check for data anomalies (e.g., missing data, data that fall outside the range of the expected or plausible based on industry averages or physical reality, non-standard environmental aspects/indicators, incorrect/non-standard units, incorrect reporting years, incorrect normalizing factors or bases of normalization, incorrect calculations or conversions, etc.). When possible, checking for data anomalies will be automated as part of electronic data entry processes. Data anomalies will be flagged and corrected, to the extent possible, in consultation with data collection staff and facility managers.

Quality control statistics

The Project Manager will prepare summary statistics of data quality problems at the close of the project (i.e., unresolved data anomalies as a percentage of the number of data points) and a narrative description of problems encountered and any potential bias in the data caused by data anomalies. The NHDES QA Manager will review this documentation, and the Project Manager will include this information in the data evaluation section of the final project report (see Section D3).

B6. Instrument/Equipment Testing, Inspection, and Maintenance

N/A

B7. Instrument/Equipment Calibration and Frequency

N/A

B8. Inspection/Acceptance for Supplies and Consumables

Apart from ordinary office supplies, no "supplies and consumables" are anticipated to be used.

B9. Non-Direct Measurements (i.e., Secondary Data)

Secondary data to be collected for this project, their intended uses, and their limitations are described in the table below.

Table 3: Secondary Data

Data	Source	Intended Use	Limitations / Acceptance Criteria
Information supplied in surveys and questionnaires.	The parties that fill out the surveys	Tracking of various behavior or knowledge changes – see Table 2, Logic model, in 1/30/06 project work plan.	Self-reporting bias, review by NHDES staff for consistency & reasonableness to be done.
State and federal environmental compliance records from the past three years	Various program-specific EPA, NHDES, & NH Department of Justice staff and databases	Compliance records will be used to determine the eligibility of facilities to participate in the project.	None, apart from a "straight-face" check.
Internal EMS documentation and third-party audits	Participating facilities, auditors	Verification that the facility has a properly functioning EMS	The reports will only be used to establish that the EMS is functioning as designed, not to make determinations about environmental compliance or performance
Results of EMS-regulatory initiatives in other jurisdictions	EPA, Other States	A basis for evaluating the success of project components (e.g., how did the results of our initiative, in which facility assistance was provided by non-profit partners, compare--in terms of environmental improvement, cost-effectiveness, and participant retention--with the results of initiatives in which facility assistance was provided by NHDES staff at seminars, or provided by "mentor" facilities?)	Only initiatives with similar approaches will be considered. The comparisons must be made with caution, since each initiative has its own idiosyncrasies and it is hard to isolate a single variable.

Table 3: Secondary Data

Data	Source	Intended Use	Limitations / Acceptance Criteria
Reports of environmental performance submitted by facilities participating in NH Sagamore	Participating facilities, using forms previously produced by EPA's Ptrack program.	Tracking of environmental performance by participating facilities.	Self-reporting bias to be addressed by NHDES staff review for consistency & reasonableness and by follow-up site visits, as per Ptrack.

Key resources/support facilities needed

The Project Manager has access to the data sources mentioned above. NHDES does not anticipate any obstacles to this approach.

Determining limits to validity and operating conditions

Data will be reviewed for reasonableness and consistency as has been described above. Where data for a facility from times prior to the grant is available, it will be accessed and used as a source to help determine what is reasonable and/or consistent.

B10. Data Management

At this time, a formal data management strategy has not been developed. NHDES anticipates keeping information in a file cabinet, clearly labeled and in directories on the NHDES networks, also clearly labeled. The Project Manager is responsible for ensuring that that these data management methods work, and for developing a strategy if it becomes necessary, and, in that case, that the QAPP is amended to reflect that strategy. This plan is consistent with the existing NHDES Quality Management Plan. If amended, it is anticipated that this QAPP section on data management will provide information, as appropriate, on the following:

- Data management scheme, from field to final use and storage (including flowcharts, if available)
- Standard recordkeeping and tracking practices, and document control system. Relevant NHDES documentation of standard practices will be cited in lieu of listing all practices in an amended QAPP whenever possible.
- Data handling equipment/procedures that will be used to process, compile, analyze, and transmit data reliably and accurately
- Individuals responsible for elements of the data management scheme
- Process for data archival and retrieval
- Procedures to demonstrate acceptability of hardware and software configurations

No checklists and forms have been developed yet, apart from the existing Ptrack forms referenced in this QAPP.

C ASSESSMENT/OVERSIGHT

C1. Assessment and Response Actions

The NHDES Quality Assurance Manager will conduct a Readiness Review prior to each major primary data collection step, anticipated to be limited to promulgation of surveys and questionnaires. (Other information will be gathered using pre-existing forms, such as existing Ptrack forms, although minor modifications may be made to reflect NH-specific conditions. However, the goal is to use Ptrack forms whenever possible.). The QA Manager will report findings to the Project Manager, who will take corrective action if any is necessary. The QA Manager will review and approve the results of such corrective action. Collection of data will not begin until the QA Manager certifies readiness. The Project Manager and QA Manager will meet regularly with any relevant parties within and outside of NHDES to identify emerging/unanticipated problems and take corrective action, if necessary.

C2. Reports to Management and EPA

QA reporting will be included in all regular project reports. Three kinds of reports will be prepared: readiness reviews (described above, to be kept internal to NHDES), regular quarterly progress reports, and project final report. Progress reports will note the status of project activities, including, but not limited, to identification of any QA problems encountered with an explanation of how they were handled. The project final report will include analysis and interpretation of data, observations and conclusions. The final report will include identification of data gaps and relevant limitations in the way the results should be interpreted.

All reporting requirements in the April 11, 2006 Grant Agreement transmitted by EPA will be complied with.

Table 4: Project Status Reports

Type of Report	Frequency	Date(s)	Preparer	Recipients
Readiness Review	Before each major data collection task	TBD	Vincent Perelli, NHDES QA Manager	Robert Minicucci, Project Manager
Progress Report	Quarterly	TBD	Robert Minicucci, Project Manager	Jean Holbrook, EPA Reg 1 Project Officer (Copying US EPA OPEI)
Final Project Report	Once	TBD	Robert Minicucci, Project Manager	Jean Holbrook, EPA Reg 1 Project Officer (Copying US EPA OPEI), stakeholders

D DATA REVIEW AND EVALUATION

D1. Data Review, Verification and Validation Criteria

During data review, verification, and validation, staff will be guided by the data quality criteria listed in Section A7, as well as any additional criteria discussed in Section B.

D2. Verification and Validation Methods

To confirm that QA/QC steps have been handled in accordance with the QAPP, the NHDES QA Manager will prepare a readiness review before key data collection steps (as described in Section C1). Also, the Project Manager will prepare data handling reports, to be emailed to and reviewed by the QA Manager, after each data collection step and each data analysis step. These reviews and reports will be guided by the quality criteria described in Section D1, above, and performed in accordance with NHDES's Quality Management Plan.

If at any point during verification and validation the Project Manager or the NHDES QA Manager identifies a problem (e.g., the use of substandard data when higher-quality data are available, a faulty algorithm, a mismatch between a data set and the question it is meant to answer), the Project Manager, QA Manager, and any other relevant staff will discuss corrective action. If necessary, the Project Manager will issue a stop-work order until a solution is agreed upon. The Project Manager will implement corrective action. If the solution involves changes in project design, the Project Manager will amend the QAPP as necessary and distribute the new revision.

D3. Evaluating Data in Terms of User Needs

The final project report will contain an evaluation of the uncertainty of project results, as well as an evaluation of the effectiveness of the surveys as a means of collecting data on behavior changes. The Project Manager will prepare this evaluation in consultation with the QA Manager. For each conclusion reached by the project, this evaluation will explain, in narrative form: the quality of data and the methodologies used to inform the conclusion, the subsequent confidence in the conclusion, and the validity of generalizing results beyond the project.