

Environmental Stewardship

Moving Beyond Compliance For a Sustainable Future



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New Jersey Department of Environmental Protection

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Using the guide.

This document serves as guidance for the Department's Environmental Stewardship Program. It contains the list of questions that comprise the Environmental Stewardship Checklist, frequently asked questions about the program and basic guidance for individuals who want to learn more about the various environmental stewardship topics. Sites have the opportunity to voluntarily participate in the Stewardship Program by demonstrating activities that qualify for recognition as an environmental stewardship activity by the Department during routine inspections.

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Introduction

As of January 2008, the New Jersey Department of Environmental Protection (NJDEP) initiated a recognition program to highlight Environmental Stewardship as part of its compliance assurance efforts. This initiative will be available to members of the regulated community who have implemented improvements at their businesses that go beyond the minimum regulatory requirements and result in increased benefits to the environment. Often during compliance visits inspectors will observe improvements at a facility that exceed the regulatory requirements. However, in the past there has not been a way to recognize the efforts of these environmentally proactive businesses.

The Environmental Stewardship Initiative is a voluntary program that utilizes existing Department infrastructure and personnel to capture information during routine enforcement inspections. Recognition will be given to members of the regulated community who are engaging in positive activities that benefit the environment. Sites may achieve recognition in 21 different stewardship categories defined in a 23 question checklist making up the bulk of this guide.

Our goal is to encourage the regulated community to evaluate their current operations and consider incorporating stewardship initiatives, where possible. This program is initially limited to observations at those sites the NJDEP already plans to visit to ensure compliance. We hope that this information will be a valuable resource for all those who wish to practice environmental stewardship.

Environmental Stewardship Checklist Questions

1. ENVIRONMENTAL STEWARDSHIP ACTIVITIES - Do any site activities "go beyond" the minimum regulatory requirements and serve as examples of Environmental Stewardship or Sustainability?

This is the first question that the inspector will ask to determine if the facility has initiated any activities at their site that qualify for environmental stewardship recognition. Sites which are doing stewardship but are unprepared to discuss them may be asked to do some homework aligning information to our checklist to be presented at a subsequent inspection. If no activities have been implemented the inspector will end the questions and information will be provided to the facility operator about the Environmental Stewardship Initiative.



For more information on becoming a sustainable business:

SAGE—guidance for small businesses

<http://www.state.nj.us/dep/sage/repower.html#>

2. UPDATES - Are any updates required to reflect additions or subtractions of qualifying Environmental Stewardship activities based on previous survey results for the site? (Y/N)

This question will allow facilities that have already received environmental stewardship recognition to update their information posted on the NJDEP Environmental Stewardship web page.

3. ENVIRONMENTAL POLICY - Is the site operated under a comprehensive written environmental policy, signed by the current senior officer of the organization addressing more than just compliance?

An Environmental Policy is a specific, written comprehensive policy that establishes the environmental goals and principles of a company.



Keys To Qualifying

- Written document-Inspector must see it.
- Defined and executed by management
 - ideally signed but ok if obviously endorsed /promoted

The policy must be strongly supported by the organization's leadership, address more than just compliance and be incorporated in all levels of the organization's structure to qualify.

- Employees aware of policy
 - Posted or obviously shared at site
- Commitment to environmental performance beyond just regulatory/legal compliance



Information on how to write an Environmental Policy can be obtained at the following websites:

① **Developing an Environmental Policy Statement**

http://www.gov.ns.ca/nse/pollutionprevention/docs/ENV_POLICY_factsheet.pdf

① **Global Reporting Initiative**

<http://www.globalreporting.org/>

4. ENVIRONMENTAL MANAGEMENT SYSTEM - Is the site operated utilizing an Environmental Management System (EMS)? If yes, describe the system employed and list any certifications.

An Environmental Management System (EMS) is a set of processes and practices that enable an organization to reduce its environmental impacts and increase its operating efficiency. All businesses (large or small) will benefit from implementing an EMS since it improves environmental performance, results in reduced liability, improves compliance, reduces operating costs and provides a competitive advantage due to more effective and efficient operations. A site with a properly executed EMS must have an Environmental Policy (Question #3) and regularly evaluate environmental performance at least annually.



Keys to Qualifying

- Must also have an Environmental Policy
- Site should have a comprehensive EMS document or plan
 - More than just compliance
- Performance evaluation
 - Written reports
 - At least annually



For more information on Environmental Management Systems visit the following websites:

❶ **EPA—7 FAQs About Environmental Management Systems**

<https://www.epa.gov/ems/frequent-questions-about-environmental-management-systems>

❷ **ISO—Environmental Management Systems**

<http://www.iso.org/iso/home.htm>

5. ANNUAL ENVIRONMENTAL REPORT - Does the site publish an Annual Environmental Report?

To receive recognition for this question a company must prepare a report of both good and bad environmental results published to the web. Many annual reports are about money, profits, quality or customer satisfaction. Others may highlight environmental achievements or success. The report we seek is an honest assessment of the major areas of environmental harm by the site (emissions, discharges, waste, etc.) and will ideally show progress on goals related to these things. An annual environmental report is a necessary component of an Environmental Management System. Because these reports include both the good and bad environmental stories about a site, many companies will not make them public even if they do use them to implement an EMS. Sites are required to publish these reports in order to get recognition for reporting. Any required reporting will not qualify.



Keys to Qualifying

- Measures improvement or elements beyond just compliance
- Public document that must be available online
 - Online report must be within one year
- Very small organizations may qualify with less formal reporting



For more information on Annual Environmental Reports visit the following websites:

❶ **Global Reporting Initiative—G3 Sustainability Guidelines**

<http://www.globalreporting.org/services/Pages/default.aspx>

❷ **Ceres -Facility Reporting Project**

<http://www.ceres.org/NETCOMMUNITY/Page.aspx?pid+436&srcid=556>

6. CARBON FOOTPRINT ANALYSIS - Has the site accounted for all greenhouse gases? If yes, describe method used.

A carbon footprint analysis is a measure of the exclusive global amount of carbon dioxide (CO₂) and other greenhouse gases emitted by a human activity or accumulated over the full life cycle of a product or service. It is all encompassing and includes direct and indirect emissions such as, transportation of raw materials/product/waste; process emissions; fugitive emissions; consumption of electric, heat or steam; air conditioning/refrigeration; business travel; and employee commuting. Typically, a carbon footprint is expressed as a CO₂ equivalent, usually in kilograms or tons. To receive recognition for this category a facility must show the inspector a greenhouse gas emission value and the documentation that details the data and method used to calculate the carbon equivalent emission value for the site.



Keys to Qualifying

- Site should have documentation/report of all greenhouse gases including offsite contributions
- Must explain methodology/standard used
 - Greenhouse Gas Protocol; or others
- Disclosure to public is voluntary, but encouraged



For information on standards and methods for calculating your greenhouse gas emission value visit the following websites:

- ① **EPA—E3 Sustainability Tools**
<https://www.epa.gov/e3/e3-sustainability-tools>
- ① **Greenhouse Gas Protocol Initiative**
<http://www.ghgprotocol.org/>
- ① **Carbon Disclosure Project**
<https://www.cdp.net/en/info/about-us>

7. ENVIRONMENTAL PURCHASING POLICY- Has the site implemented an "Environmental Purchasing Policy" resulting in the purchase of products and office supplies that are recognized as environmentally responsible? If yes, describe.

Businesses can be credited for this category if they have a written Environmental Purchasing Policy that requires the purchase of environmentally responsible products utilized by their facility. If no written policy exists, a facility can also receive recognition if, during the NJDEP site visit, supplies that qualify as environmentally responsible are observed at the facility.



Keys to Qualifying

- Site **must provide one** of the following:
 - A written policy
 - Documentation of preferred products purchased and presence of *substantial* environmentally preferred products on-site
- In all cases environmental aspect should be obvious or easily explained by site rep.



To learn more about developing an Environmental Purchasing policy visit the following websites:

- ① **NASPO Green Purchasing Guide**
<http://www.naspo.org/green/index.html>
- ① **EPA Report—Integrating Green Purchasing into your Environmental Management System**
<https://www.epa.gov/greenerproducts/integrating-green-purchasing-your-environmental-management-system-ems>

① **NJ Green Purchasing**

<http://www.state.nj.us/treasury/purchase/green-purchasing.shtml>

8. VENDOR/SUPPLY CHAIN REQUIREMENTS - Does the site require that businesses in their supply chain subscribe to environmentally sound business practices? If yes, explain method i.e. contract with vendors.

Responsible companies can influence the business practices of others by requiring that their vendors utilize environmentally sound and responsible practices when providing contracted goods and services. This can be accomplished through written agreements with the vendor companies and an established auditing process to ensure commitments are achieved.



Keys to Qualifying

- Written policy agreement with vendors
- Specify environmental criteria for vendors
- Establish a vendor auditing system
 - How do they know what suppliers are doing?

9. MENTORING TO OTHER BUSINESSES - Does the site offer mentoring of an environmental nature to other businesses? If yes, describe the mentoring program and any available contact information the site can provide.

An Environmental Mentoring program is a reciprocal and collaborative learning relationship that allows a more experienced organization to share its "best" environmental practices with another organization. Businesses that have an established environmental mentoring program that is offered to other businesses will receive recognition for their program.



Keys to Qualifying

- **Must** be environmentally based
- Be able to describe
 - Who you are mentoring or willing to mentor
 - How others can contact you to participate either directly or through association membership
- Must not be profiting
 - not a paid consultant
 - not sales/marketing



Visit the following websites to learn more about Environmental Mentoring:

- ① **Tips for Successful Environmental Mentoring**
<http://www.greenbiz.com/resources/resource/tips-for-successful-environmental-mentoring>
- ① **The Mentoring Handbook**
<http://infohouse.p2ric.org/ref/06/05816.pdf>
- ① **National Environmental Education Foundation**
<https://www.neefusa.org/>

10. OUTREACH PROGRAM - Does the site have an outreach program that offers assistance to community leaders, local schools, neighborhood groups, etc. to address, educate and collaborate on environmental issues within the community. If yes, explain program.

Recognition will be given to businesses that have established an outreach program to assist local organizations in addressing issues within the community and that results in a benefit to the environment either directly or indirectly.

Local community projects such as a stream cleanup or contributing resources and/or expertise to organize and present an environmental education program to the public are examples of projects that would qualify for stewardship recognition.



Keys to Qualifying

- Must be environmentally educational or beneficial
- Must have occurred within past 1 year
- Not sales/marketing



Visit the following website for Environmental Outreach Activity Ideas:

① **Environmental Activity Ideas**

http://www.michigan.gov/documents/deq/deq-ess-nep-envactivities_306107_7.pdf

11. GREEN BUILDING CERTIFICATION - Has the site registered or received certification for any new construction or major building renovation project from a recognized green building organization such as LEED or Green Globes? If yes, describe registered or certified green building construction projects at the site.

Green Building design criteria evaluates the complete life cycle of a building, which includes siting considerations, as well as, all activities and practices associated with building design, construction, operation, maintenance and removal. Recognized green building organizations, such as LEED, (Leadership in Energy and Environmental Design), Green Globes, Energy Star Qualified Home, have established rating systems and certification processes to evaluate newly constructed buildings or major renovations of existing buildings. Facilities that have been "certified" as green buildings or buildings "registered" for certification can be credited by the Department for this achievement.



Keys to Qualifying

- Must be listed as registered site working toward achieving certification **or**
- Actual certification document or award recipient
 - LEED rating from accredited 3rd party
 - Green Globes-from EC3 Global
- If the answer to this question is yes, the facility will automatically receive a "yes" for the next question on green building implementation.



To find out more about green building requirements look at the following websites:

- ① **U S Green Building Council**
<http://www.usgbc.org/>
- ① **Green Building Initiative – US Green Globes System**
<https://www.thegbi.org/>
- ① **Natural Resources Defense Council Greener by Design: NRDC's Santa Monica Office (Platinum LEED certification)**
<http://www.nrdc.org/cities/building/smoffice/intro.asp>
- ① **LEED**
<https://new.usgbc.org/leed>
- ① **Energy Star Buildings and Plants**
<https://www.energystar.gov/buildings>

12. GREEN BUILDING IMPLEMENTATION - Has the site undertaken any projects supportive of green design concepts or does the site incorporate green building design criteria for new construction/renovation projects? If yes, describe projects or provide written policy.

Under this category recognition will be given to sites that have incorporated green building design concepts in their building or site improvement projects whether they have or have not received third party certification from a green building organization such as LEED or Green Globes. Also, credit under this question will be given to sites that have not completed projects but have a written policy that confirms an organization's commitment to incorporate green



Keys to Qualifying

- Following green building principles
- No certification required
- Can be small and narrowly focused provided that:
 - Obvious or demonstrable environmental benefit
 - Took thought, effort or cost beyond standard practice

design concepts whenever planning and executing new construction or renovation projects at the site.

- Applies to facilities, buildings and grounds not manufacturing, operations, processes or transportation (see question numbers 18 & 19)
- Automatic if certified (#11 Green Building Certification)

13. LIFE CYCLE ASSESSMENTS - Has the site conducted a Life Cycle Assessment of any products or services, and based on findings implemented actions to reduce the environmental impact(s)? If yes, describe.

Life Cycle Assessment (LCA) considers the entire life of a product regardless of who oversees various stages or where those stages occur. LCA includes everything from raw material extraction and intermediate product synthesis (even if done by others), to final production to customer use during its entire period of service to ultimate disposal or reclamation. Across all stages an LCA must include all types of **environmental** discharges and degradation (air, water, waste, land use, etc.) and their potential impacts to health, the environment and ecosystems. The results of an assessment allow companies to determine where inefficiencies exist and evaluate where improvements can be made to lessen environmental impacts.



Keys to Qualifying

- An environmental assessment using specific standards
 - EPA LCA101
 - ISO 14040
- Must be able to elaborate on the product, environmental assessment findings and outcome
 - What changes took place?
 - What decisions were made?
- LCA is **not** a product quality assurance evaluation nor an economic evaluation.



The following website provides basic information regarding Life Cycle Assessments:

① **Life Cycle Initiative**

<https://www.lifecycleinitiative.org/>

① **Life Cycle Assessment: Principals & Practice**

<https://hero.epa.gov/>

① **Life Cycle & Resource Management**

<http://www.unep.fr/scp/lifecycle/>

14. HAZARDOUS MATERIALS REDUCTION - Has the site implemented a change in operations and/or product formulation resulting in reduction or elimination of hazardous materials used/disposed of at the site? If yes, describe.

Facilities that utilize hazardous materials in their operational activities at the site will receive recognition from the Department for implementing changes that results in the reduction of the amount of hazardous materials used. Facilities that qualify for this credit should be able to produce documents that show a reduction in the amount of hazardous material used at the facility within the last year.



Keys to Qualifying

- Applies to hazardous materials
- Site should be able to back up reductions with data or demonstrations
 - Manifests
 - Observable process change
 - Goal tracked in EMS and found in annual report
- Production adjusted reduction (not from slow business cycle)
- Reduced risk with same volume or amount can qualify (swap high hazard for low hazard)



For more information on hazardous waste reduction visit the following websites:

- ① **Guidance on Inherently Safer Technology**
http://www.state.nj.us/dep/enforcement/tpca/downloads/IST_guidance.pdf
- ① **Creating a Waste Reduction Program**
http://www.ewashtenaw.org/government/departments/environmental_health/recycling_home_toxics/waste_knot/wkassist_html

15. WATER USE REDUCTION - Has the site employed a program to substantially reduce or reuse water? If yes, describe

Recognition will be given for any changes implemented at a facility that results in reduced water use. A few examples of activities that would qualify for recognition include, installation of water saving fixtures, gray water recycling systems, rain water harvesting systems or reuse of production waste water.



Keys to Qualifying

- Site should be able to back up reductions with data or demonstrations
 - Water bill or other monitoring
 - Obvious process change observed
 - Goal tracked in EMS and found in annual report
- Production adjusted reduction (not from slow business cycle)
- No credit for drought restriction steps



More information can be found at the following websites:

- ① **EPA WaterSense Program**
<https://www.epa.gov/watersense>
- ① **Water Footprint**
<http://www.waterfootprint.org/>
- ① **LEED—Water Use Reduction for Businesses**
<https://www.usgbc.org/credits/retail-nc/v2009/wec3>

16. MATERIAL CONSERVATION - Has the site taken actions to reduce total material usage or disposal?.

Conservation of materials applies to any production, consumption or disposal practices. This may include raw materials, consumables, packaging and wastes. In order to qualify, reductions must be production-adjusted and not due to a slow business cycle. All qualifying actions should be measurable and easily supported, such as with bills, or production records. Some common ways of conserving materials include:

- Process, product or formulation changes
- Participation in waste exchanges
- Re-use of operational wastes
- Non-mandatory recycling*

*Most recycling is mandatory and will not qualify. For recycling to qualify, a site must be able to explain how the recycling practices exceed current requirements (County plan and local ordinances).



Keys to Qualifying

- Site should be able to document type and quantity of materials exchanged/reused/recycled
- Exchanges or one-time events must have occurred within one year
- Process, product or formulation changes from anytime in the past must exceed current common practice for recognition
- Recycling must exceed mandatory requirements
 - Beyond County Plan
 - Beyond Municipal Ordinance
- Durable goods and capital investment “life cycles” will not be considered
- Combustion of waste or recycling into a fuel will not be recognized



For more information on waste exchange/reuse/recycling programs visit the following websites:

① **EHSO Waste Exchange Information**

<http://www.ehso.com/wastexchg.php>

① **EPA WasteWise Program**

<https://www.epa.gov/smm/wastewise>

① **Recycling in New Jersey**
<http://www.nj.gov/dep/dshw/recycling/>

① **Association of New Jersey Recyclers**
<http://www.anjr.com/>

17. EMPLOYEE TRIP REDUCTION - Has the site implemented a successful employee trip reduction program? If yes, describe program and results or participation.

Recognition will be given to companies that encourage their employees to reduce or eliminate commuting trips to work by offering a telework program, flexible work schedules, or company incentives to carpool or use public transportation.



Keys to Qualifying

- Site should be able to show:
 - Policy or program summary/rules
 - Records of participation or trip reduction



Visit the following websites to learn more about trip reduction programs:

① **General information - Trip Reduction Programs**
<http://www.vtppi.org/tdm/tdm9.htm>

① **New Jersey Energy Master Plan – Trip Reduction Strategies**
<http://nj.gov/emp/home/docs/pdf/121806commute.pdf>

① **NJDEP—Green Commuting in NJ**
<http://www.nj.gov/dep/baqp/green.html>

① **Employee Trip Reduction Resources**
<http://www.wsdot.wa.gov/TDM/CTR>

18. PROCESS/OPERATIONS ENERGY USE REDUCTION

- Has the site substantially improved its energy efficiency by implementing changes in production/manufacturing operations? If yes, describe what was done, date initiated and impact on energy use.

Sites that reduce their energy use associated with process and production operations will be given recognition under this question. Recognition would be given for changes such as, more efficient manufacturing equipment that resulting in less energy use during the manufacturing process. However, because efficiency is expected to steadily increase and carries automatic economic savings, improvements should be within last 5 years despite their ongoing contribution.



Keys to Qualifying

- Changes should be observable or documented
- These should be changes with potential to noticeably reduce a site's carbon footprint
- Reduction within last 5 years



For more information visit the following websites:

- ① **Energy Star Website**
http://www.energystar.gov/index.cfm?c=about.ab_index
- ① **American Council for an Energy-Efficient Economy—Commercial Sector**
<http://aceee.org/sector/commercial>
- ① **American Council for an Energy-Efficient Economy—Industrial Sector**
<http://aceee.org/sector/industrial>

19. TRANSPORTATION ENERGY USE REDUCTION - Excluding employee trip reduction, has the site substantially improved its energy efficiency by implementing changes in transportation utilized? If yes, describe what was done, date initiated and impact on energy use.

Facilities will receive recognition for practices such as upgrading their fleets with hybrid or other low emission vehicles or by switching to cleaner burning fuels. However, because efficiency is expected to steadily increase and carries automatic economic savings, improvements should be within last 5 years despite their ongoing contribution.



Keys to Qualifying

- Changes should be observable or documented
- These should be changes with potential to noticeably reduce a site's carbon footprint
- Reduction within last 5 years



For more information visit the following websites:

- ① **EERE: Vehicle Technologies Program**
<https://energy.gov/eere/vehicles/vehicle-technologies-office>
- ① **US DOE Alternative Fuels& Advanced Vehicles Data Center**
<http://www.afdc.energy.gov/afdc/>

20. RENEWABLE ENERGY USE - Does the site use renewable energy sources? If yes, identify the direct source (solar, wind, bio, etc.) or name the CleanPower supplier and characterize the amount.

Sites can receive recognition from the NJDEP by installing equipment to generate renewable energy power for onsite operations. Installation of solar panels, wind mills, or utilizing geothermal technology to heat and cool a facility are examples of projects that would qualify for recognition. In ad-



Keys to Qualifying

- Any installations should be functional
- CleanPower purchases should be clearly shown in energy bills
- No time limit on renewable installations

dition, facilities that purchase power from a New Jersey CleanPower supplier (currently, Community Energy, Green Mountain Energy, Jersey Atlantic Wind or Sterling Planet) can also receive recognition from the NJDEP. Power companies themselves can qualify if they are exceeding renewable energy standards.



For more information visit the following websites:

- ① **New Jersey's Clean Energy Program**
<http://www.njcleanenergy.com/>
- ① **New Jersey Renewable Energy Requirement**
<http://www.state.nj.us/dep/aqes/oepa-renewable-portfolio.html>
- ① **New Jersey Board of Public Utilities**
<http://www.bpu.state.nj.us/>

21. ENVIRONMENTAL ENHANCEMENT PROJECTS - Has the site undertaken an Environmental Enhancement Project that has resulted in the reclamation or improvement of land at the site or within the community? If yes, identify the project and the resulting improvement to the environment.

Facilities can receive recognition for addressing environmental issues associated with their site or in their community. Projects must have an environmental benefit to receive recognition such as, wildlife habitat restoration, invasive species weed control, tree planting, or reducing runoff by converting impervious areas to pervious land.



Keys to Qualifying

- Site should be able to demonstrate project is current/maintained
- Project must be completed or underway
- Enhancements or mitigation required by permit or settlement action do not qualify



For more information visit the following websites:

- ① **Wildlife Habitat Council (WHC)**
<http://www.wildlifehc.org/>
- ① **NJ Environmental Commissions**
<http://www.anjec.org/>
- ① **Watershed Rehabilitation Program in NJ**
<http://www.nj.nrcs.usda.gov/programs/watersheds/rehabilitation.html>

22. INNOVATIVE PROGRAM - Has the site adopted/ developed any innovative programs not captured in other checklist questions that improve/reduce the site's environmental impact and promotes environmental excellence within its organization? If yes, describe initiative.

This question will allow recognition for innovative approaches that have been implemented voluntarily at a site to address environmental issues that do not easily qualify under other checklist questions.



Keys to Qualifying

- Any voluntary activity or program that results in a benefit to the environment but does not easily qualify for recognition under the previous categories

23. EPA VOLUNTARY PROGRAMS - Is the site participating in an EPA sponsored voluntary program? If yes, identify the EPA program.

Facilities participating in an EPA sponsored voluntary program will receive recognition from the Department for their participation. Documentation that confirms registration and participation in at least one EPA Environmental Stewardship or EPA Partnership Program is required to receive credit.



Keys to Qualifying

- Site should be able to clearly identify any formal EPA program and describe their participation



To find out more about the EPA's voluntary programs visit the following websites:

① **Summary of EPA Voluntary Programs**

<http://www.nj.gov/dep/enforcement/stewardship/EPAVoluntaryPrograms.pdf>

① **EPA Environmental Stewardship Programs**

<http://www.epa.gov/stewardship/index.htm>

Please note: In March 2009, EPA decided to halt the Performance Track Program. As a result, beginning in March 2010, the NJDEP will cease giving stewardship recognition to EPA Performance Track participants.

Frequently Asked Questions

What is environmental stewardship?

For the purposes of NJDEP's initiative, environmental stewardship is when a regulated entity voluntarily engages in activities that go beyond the minimum requirements, rules and regulations, resulting in a positive benefit to the environment.

How does environmental stewardship compare to “Sustainability”?

Environmental stewardship is generally the careful and responsible management of the environment for the present and the future. This can be seen as one of the three components of sustainability which integrates the environmental, social, and economic considerations relevant to current and future generations.

Who can be an environmental steward?

Anyone can act as an environmental steward and this initiative will provide information and resources to encourage stewardship. Currently, only those who are inspected by the NJDEP for compliance with the regulations will be asked to respond to our environmental stewardship survey during the normal inspection process. Results of these surveys will both acknowledge and promote sharing of best practices.

Why should I be an environmental steward?

While everyone has a responsibility to pass on a healthy and safe environment to future generations, NJDEP believes that stewardship practices can save costs, add value, and potentially

reduce a site's regulatory responsibilities. Practicing stewardship can be a significant investment, but one that can also pay for itself. Actual costs may involve up-front investments in time, effort and money. The biggest hurdle is often simply gathering the information and knowledge about what is possible. With the proper information and the full accounting of typically hidden costs, choices in favor of stewardship become easier and more obvious. In addition, this program offers an opportunity to be "caught" doing something good and to be acknowledged for it.

Can the NJDEP help me become an Environmental Steward?

The NJDEP's primary responsibility is ensuring compliance with environmental rules and regulations. NJDEP inspectors will provide some general guidance and information during planned site visits, but will not be able to respond to open requests for assistance. Inspectors will not be directly involved in helping a site develop its environmental stewardship project or activity. The NJDEP Environmental Stewardship web site at <http://www.stewardship.nj.gov/> provides external website links that will be helpful to businesses interested in becoming an Environmental Steward. Also, as the program develops, the NJDEP hopes to establish a network of Environmental Stewardship mentors who will offer assistance to other businesses.

Do I have to take part in this new environmental stewardship initiative?

No, the evaluation of Environmental Stewardship activities at a facility are not mandated or required by law. This is a voluntary initiative designed to give recognition to sites engaged in innovative environmental activities and/or who exhibit performance within their organization that goes beyond the minimum requirements of any existing environmental regulations.

How often will the NJDEP inquire about stewardship?

Stewardship surveys will be conducted during most NJDEP compliance inspections. The frequency of these inspections varies significantly by the type and size of site operations. Any NJDEP inspection will provide the opportunity for identification of changes or additional activities.

How long will verification take?

The NJDEP effort to capture stewardship information will depend on the level of environmental stewardship being practiced at the site. It will also depend on how well prepared and knowledgeable a site representative is when surveyed by NJDEP staff.

Do I have to prepare anything?

Yes. Understanding stewardship and being prepared to answer the checklist questions will help ensure both the accuracy and efficiency of the process. It will not be necessary to inundate the inspector with voluminous information. You need only to demonstrate the stewardship activity is occurring.

What if I have compliance issues?

Most non-compliance will not prevent the NJDEP from recognizing stewardship efforts. It is understood that environmental regulation can be complex and extensive. Often well meaning and responsible parties can make mistakes. The NJDEP intends to share both positives and negatives with the public and reserves the right to exclude habitually or egregiously non-complying sites.

How will the NJDEP verify stewardship?

Establishing that a site is in compliance will continue to be the primary focus of an inspection. Resources are not available to conclusively verify all stewardship activities at the same level that the NJDEP verifies environmental compliance. However, participants will have to demonstrate to the satisfaction of the inspector that the stewardship activities are in fact occurring. The inspector will not just take your word for it; the inspector must clearly understand the activity and how it is environmentally beneficial. This will be done primarily through an interview but, at the inspector's discretion, may also include a review of certain documents, structures or processes. Also, the publication of this information provides opportunity for many to help NJDEP verify accurate responses. Customers, peers and the public have an interest in sites pursuing stewardship and living up to their claims. Misrepresenting stewardship activities leaves site operators subject to serious questions. NJDEP will reserve the right to exclude sites in the future for misrepresenting themselves.

Do site web links need to be included?

If a website exists for the site then the link needs to be provided by the facility and included in the comments.

What will the inspector document or publish?

The DEP wishes to publish a succinct statement about every qualifying activity to make clear what stewardship activity has occurred and why it qualifies for recognition under the program. The published statement should address the “Keys to Qualifying” that are listed for each category. An inspector may modify comments that are provided by a site in order to meet our objectives of brevity and clarity. Sites should endeavor to provide a short clear statement of each qualifying activity that the inspector can work with.

What kinds of things will the inspector look at?

The inspector may ask to see policies, records, processes or projects that confirm the stewardship activities being conducted at a site. For the most part, the inspector will rely on the information obtained during the interview conducted with the site representative. An inspector will expect clear, concise responses that demonstrate a thorough knowledge of stewardship activities being conducted at the site and the ways those activities meet the program's environmental qualifications.

Can I receive credit for past environmental stewardship activities/projects?

In order to be recognized, a stewardship activity (or its benefit) must be ongoing or have occurred within a year. Recognition can be given for a one-time change that yields on-going benefits as long as the change is not reversed and thus the benefit erased. A formulation change 6 years ago that eliminated all hazardous components from a product can be recognized as still yielding benefit, provided the same product is still being made and would still be allowed to change back (the hazards haven't since been outlawed). Similar ongoing benefits may come from water conserving changes.

In three categories that relate to energy there is a five-year limit on recognition of ongoing benefit (questions #12 Green Building Implementation, #18 Process Energy, and #19 Transportation Energy). The five-year energy limit adjusts for the fact that costs associated with energy will always drive decisions in favor of greater efficiency. Without this time limit almost everyone could point to past improvement. If everyone got this credit it would become meaningless.

What doesn't count as stewardship?

Primary business activity - Because it creates the situation of making statements about the value of one business vs. another, recognition will not be given for activities which are part of any businesses primary activities. While these are technically voluntary they are considered to be taken with a strong profit motive and not truly out of a sense of stewardship. Some examples:

- Commercial composter not credited for composting
- Solvent recycler not credited for recycling or fuel blending solvent
- Auto recycler not credited for recycling various parts or materials
- A solar cell manufacturer is not credited with renewable energy unless they have it installed on their own site.

Burning/Waste Combustion - Many sites have suggested that burning wastes is stewardship when it displaces other fuels that would otherwise be burned. The Department's position is that burning wastes is a last resort and is not to be encouraged. In particular several have suggested that burning waste oil or blending solvents into fuel is stewardship. This is not currently being recognized.

One exception to this rule is burning of landfill gas to generate useful energy. This is recognized because capture and burning of the gas is currently required anyway. If this burning is harnessed to create energy, it can receive recognition as long as the project was not initiated as part of an enforcement settlement.

Standard Practices—A business will not be given stewardship recognition for an activity that is deemed to be a common practice or industry standard. As more environmentally friendly and energy efficient products and equipment become available in the marketplace and, in fact, become the only available option for purchase, the Department will deem acquisition of such items an industry standard and not eligible for stewardship recognition. This may also apply to any process changes if most or all industry members are utilizing the same process (standard practice) or the change was required because a particular material is no longer available to an industry i.e. phasing out of a hazardous material.

Example of Stewardship Certificate



Environmental Stewardship

The New Jersey Department of Environmental Protection's
Environmental Stewardship Initiative recognizes

COMPANY NAME

for its voluntary and proactive measures taken to go beyond compliance in an
effort to improve the environment and ensure a sustainable future.

* Participation Category

Environmental Policy
Environmental Management System
Annual Environmental Report
Carbon Footprint Analysis
Environmental Purchasing Policy
Environmental Purchasing Policy
Vendor Supply Chain Requirements
Mentoring To Other Businesses
Outreach Program
Green Building Certification
Green Building Implementation
Life Cycle Assessment

Hazardous Materials Reduction
Water Use Reduction
Materials Conservation
Employee Trip Reduction
Process Operations Energy Use Reduction
Transportation Energy Use Reduction
Renewable Energy Use
Environmental Enhancement Project
Innovative Program
EPA Voluntary Programs

Date of Inspection: October 26, 2017


Ray Bukowski
Assistant Commissioner
Compliance & Enforcement

Contact Information

Comments, Questions or Concerns?

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