



## Indiana Environmental Stewardship Program Regulatory Incentives

IDEM - Office of Program Support

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The [Environmental Stewardship Program](#) (ESP) offers regulatory incentives to ESP members. The incentives are authorized by rules under Titles 326, 327, and 329 of the Indiana Administrative Code and are summarized below. To see the rules in their entirety, click on the links below. To apply for incentives, please complete the Indiana Environmental Stewardship Program Checklist for Potential Regulatory Incentives (State Form 53706, available on the [IDEM Forms](#) page). For assistance, please contact the Office of Program Support.

### Air Regulatory Incentives ([326 IAC 25](#)):

- Advanced notice (24 hours prior) of routine inspections. No notification will be given for emergency or complaint-based inspections.
- Alternative monitoring strategies or frequencies where sustained compliance is demonstrated and sampling results remain measurably below applicable limits or where other operational parameters are in place.
- Alternative stack test frequencies for facilities that are steady state operations, have adequate compliance monitoring, and are substantially below applicable standards. Alternate stack test frequencies would not be available to tests required by 40 CFR Parts 60, 61, and 63.
- Alternative due dates for certain quarterly or semi-annual reports.
- Assign the same Office of Air Quality (OAQ):
  - Inspector for all air inspections at this source, when feasible.
  - Permit writer for all new and modified air permits at this source, when feasible.
- Expedited air permits including:
  - On-site pre-permit application meetings with the permit writer and compliance inspector.
  - Post-application meetings with members if requested or necessary.
  - Direct telephone contact from OAQ permitting staff when additional information is needed.
  - Assistance from the Compliance and Technical Assistance Program (CTAP) in IDEM's Office of Program Support (OPS). CTAP will aid OAQ by answering permit related questions and will assist ESP members during the application process.
  - Expedited review of ESP member permits via an IDEM-U.S. EPA partnership.
- Extend federally enforceable state operating permit (FESOP) renewal term up to 10 years. (This incentive is now considered to be standard practice throughout the agency.)
- Extend minor source operating permit (MSOP) renewal term up to 10 years. (This incentive is now considered to be standard practice throughout the agency.)
- Flexible permit conditions to reduce the need for future permit modifications. Members may request a permit flexibility opportunity assessment to identify the potential for operational flexibility in their permit.
- Low priority for routine inspection.

- Reduce reporting frequency from quarterly to semi-annually. This benefit may not apply to sources that have federal standards requiring quarterly reports. Deviations must be reported quarterly if not required more frequently.
- Streamline permit renewal application process for FESOP or Title V permit renewals. (This incentive is now considered to be standard practice throughout the agency.)

#### **Water Regulatory Incentives ([327 IAC 18](#)):**

- Ability to submit discharge monitoring reports annually instead of monthly, provided data used to verify compliance is adequately maintained and available upon request. Instances of noncompliance or exceedance of discharge limits must be reported to the agency within 24 hours.
- Advanced announcement (24 hours prior) of routine inspection. No notification will be given for emergency or complaint-based inspections.
- Assign the same Office of Water Quality (OWQ) drinking water:
  - Inspector for all future drinking water inspections at this source, when feasible.
  - Permit reviewer for all future permits and modifications, when feasible.
- Assign the same OWQ national pollutant discharge elimination system (NPDES):
  - Inspector for all future NPDES inspections at this source, when feasible.
  - Permit writer for all future NPDES permits and modifications, when feasible.
- Exemption from submitting monthly monitoring reports (MMR) required under 327 IAC 5-2-15(a)
- Exemption from submitting monthly reports of operation (MRO) required under 327 IAC 2-4-1. Members will still be required by permit to report any instances of noncompliance with permit requirements or discharge limits. Members will still be required to submit the discharge monitoring reports (DMR) annually as required by 327 IAC 18-2-2.
- Expedite drinking water permitting and well site selection approval when requested.
- Flexible permit conditions. Members may request a permit flexibility opportunity assessment to identify the potential for operational flexibility in their permit. Flexible permit language is intended to reduce the need for future permit modifications.
- Low priority for routine NPDES inspections.
- Reduction in NPDES permit sampling frequency where sustained compliance is demonstrated and sampling results remain measurably below applicable limits.
- Accelerated renewal of existing land application permit. ESP members do not need to submit land application renewal permits 180 days prior to expiration of the existing permit. However, ESP members must submit land application permit renewals prior to expiration of the existing permit.
- Opportunity to submit reports for the land application program within 60 days of the last day of each calendar month for the term of the permit, as opposed to 30 days for non-members.
- Streamlined and expedited review of NPDES permit renewals when requested (327 IAC 18-2-5). Members will also be eligible for streamlined application submission for renewed permits including the existing permit and only those applicable forms needed to address modifications and additions in lieu of a complete permit renewal application.

**Solid Waste Regulatory Incentives ([329 IAC 18](#)):**

- Advanced announcement (24 hours prior) of routine large quantity generator; small quantity generator; and treatment, storage, and disposal inspections. No notification for emergency or complaint-based inspections will be given.
- Assign the same Office of Land Quality inspector for all inspections at this source, when feasible.
- Assign the same Office of Land Quality permit writer for all new and modified land permits at this source, when feasible.
- Low priority for routine inspections.