

**Virginia Department of Environmental Quality Alternative Compliance Methods  
Request Form for VEEP E3 & E4 Facilities**

Facility Name:

Facility Contact:

Contact Phone and Email Address:

Type of VEEP Facility:     E3 \_\_\_            E4 \_\_\_

What is the current regulatory requirement that you are seeking to change and what process are you currently going through to meet that requirement?

What is the alternative approach you are proposing? (Include timeframe implications for other environmental media or the community, etc.)

Which permits (if any) at the facility will be affected by the proposed approach?

What are the expected benefits of the proposed approach to the facility?

What are the expected benefits of the proposed approach to the environment? Explain how the proposed change would reduce one or more of the major environmental impacts described in your facility's EMS.

## Instructions for Completing DEQ Alternative Compliance Methods Form

As outlined in Section 10.1-1187.6 of the Code of Virginia, the Air Pollution Control Board, the State Water Control Board and the Waste Management Board “may grant alternative compliance methods to the regulations adopted pursuant to their authorities” for Virginia Environmental Excellence Program E3 and E4 facilities considered to be in good standing with the program. Potential alternative compliance methods (ACM) outlined by the law include “changes to monitoring and reporting requirements and schedules, streamlined submission requirements for permit renewals, the ability to make certain operational changes without prior approval, and other changes that would not increase a facility’s impact on the environment”.

The facility proposing the ACM must demonstrate that the proposed method will meet the purpose of the applicable regulatory standard through increased reliability, efficiency or cost effectiveness and provide environmental protection equal to or greater than that provided by the applicable regulatory standard. ACMs that would alter ambient air quality standards, ground water protection standards or water quality standards will not be approved. Additionally, ACMs that increase pollutants released to the environment, increase impacts to state waters, or otherwise result in a loss of wetland acreage will not be approved.

In order for DEQ to review requests from facilities for ACMs, it is critical that all information necessary for the agency to evaluate the appropriateness and feasibility of the proposed alternative approach be submitted. A facility’s submittal should address each section of the request form and explain in detail the proposed ACM, including a demonstration showing how the ACM will meet the intent and be equivalent to or exceed the established standard from which relief is sought. This may require submittal of both documentation and references to demonstrate that the intent is met and to support their claim of equivalence.

DEQ does not intend to develop or make available a list of potential ACMs; proposals must come from facilities. Therefore, it is the responsibility of the requesting facility to demonstrate the intent and equivalency of their proposal is consistent with currently established compliance method.

Completed forms should be sent to the appropriate DEQ Regional Office with a copy sent Meghann Quinn, VEEP Program, PO Box 1105, Richmond, VA 23218. For more information on completing this form, contact: Meghann Quinn at 804-698-4021 or [meghann.quinn@deq.virginia.gov](mailto:meghann.quinn@deq.virginia.gov).