

# Michigan's Clean Corporate Citizen (C3) Program



*The Clean Corporate Citizen (C3) program is built on the concept that Michigan establishments that consistently demonstrate environmental stewardship and pollution prevention can be relied upon to carry out their environmental protection responsibilities without rigorous oversight. These establishments should enjoy greater regulatory flexibility than those that do not demonstrate that same level of environmental awareness.*

*The C3 program operates under Part 14, Clean Corporate Citizen, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.*

## WELCOME TO THE C3 PROGRAM



The Clean Corporate Citizen (C3) program allows regulated establishments that have demonstrated strong environmental performance

and a commitment to continual environmental improvement to be recognized as Clean Corporate Citizens. C3s who participate in this program receive public recognition for their efforts and are eligible for benefits including expedited permit reviews and fewer monitoring and reporting requirements.

Participation in the C3 program is voluntary and diverse. A wide range of Michigan establishments have achieved C3 status, ranging from automotive parts and assembly, chemical manufacturing, federal installations, furniture making, local units of government, metal finishing, natural gas transmission, paper production, power generation, printing, research and development, and universities.

The goal is to have a large number of diverse establishments participate in the C3 program, with resulting improvements to the environment and recognition to the participants. Recognizing and rewarding environmental performance greatly benefits our shared environment. By providing

participation incentives, the C3 program fosters increased compliance and a higher level of environmental performance.

## BENEFITS FOR YOUR ESTABLISHMENT

An establishment ready to apply for C3 designation has *already* realized benefits from developing and operating under an environmental management system and a strong pollution prevention program. Establishments that maintain compliance, commit to continual environmental improvement, and involve employees at all levels in efforts to minimize waste and other negative environmental impacts, will reap the benefits of sound stewardship now and through the years.



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Studies have shown that well-designed environmental management and pollution prevention programs can result in significant environmental and financial savings to a facility. The public benefits as well from the increase in environmental protection and the lessening of negative impacts on the environment. These benefits are a direct result of responsible environmental management and pollution prevention that C3's build into all levels of their operations.

Designated C3s also receive positive public recognition for their environmental efforts in their community and throughout the state. This increased visibility as an environmentally conscious establishment can also add value to a company's competitive position in today's global marketplace.

Achieving C3 status helps an establishment get well-deserved recognition and congratulations for environmental achievements from customers, "parent" corporations, suppliers, trade associations, local citizens, and government. When an establishment voluntarily makes a firm and lasting commitment to protect the environment, management, employees, and the surrounding community all benefit.

### **REGULATORY BENEFITS**

In addition to the positive public recognition and marketplace advantages, C3s also qualify for tangible benefits that allow permitting flexibility, shorten the waiting period to receive necessary permits, and reduce monitoring and reporting oversight. Currently, there are benefits available to C3s in the following areas:

- ❖ Air permitting
- ❖ Groundwater discharges
- ❖ Surface water discharges

Benefits are provided through the DEQ environmental program divisions by administrative rules under the authority of Public Act 451 of 1994, as amended, Public Act 399 of 1976, as amended, and Public Act 368 of 1978, as amended.

### **APPLICABILITY**

Participation in the C3 program is voluntary. The DEQ welcomes applications from responsible Michigan companies, institutions, and local units of government, both large and small. Establishments that want to apply for C3 designation must meet the specific applicability criteria.

For example, an establishment with serious unresolved violations and/or penalties would not be eligible to apply for C3 designation. Refer to the program guidance or contact the DEQ to discuss your particular establishment if you have concerns about applicability.

### **CRITERIA FOR PARTICIPATION**

The C3 program requires performance in three significant areas: environmental management, pollution prevention (P2), and environmental compliance.

#### **Environmental Management**

A Clean Corporate Citizen must have a strong and effective environmental management system (EMS) in place (see "EMS Close-Up"). An EMS that meets the criteria includes, among other components:

- ❖ Identification of environmental aspects and impacts
- ❖ Self-initiated compliance audits
- ❖ Public communication
- ❖ Environmental training for employees
- ❖ A clear statement of the establishment's commitment to environmental excellence and continual improvement

Establishments that are certified to ISO 14001:2004 standard, the international standard for environmental management systems, or have an EMS consistent with the requirements of the ISO 14001:2004 standard which is appropriate to the nature and scale of its operations, meet the EMS criteria for C3 designation.

### **Pollution Prevention**

Applicants meet these criteria by adopting a P2 policy and program to reduce waste at the source and by taking actions to:

- ❖ Identify P2 opportunities
- ❖ Establish goals to address these opportunities
- ❖ Report on accomplishments
- ❖ Participate in information and technical exchange programs

An establishment can also satisfy the P2 criteria by joining and being a member in good standing in one of the DEQ's recognized pollution prevention partnerships including:

- ❖ Michigan Business Pollution Prevention Partnership (MBP3)

### **Environmental Compliance**

To apply for C3 designation, an applicant must demonstrate consistent compliance with all applicable state and federal environmental requirements and have no outstanding unresolved violations. A complete list of establishment-related permits, licenses, and binding agreements is required as part of the application. Specific compliance criteria (R324.1507) must be met to apply for and receive C3 designation as well as renewal.

### **APPLICATION PROCESS**

A pre-meeting with DEQ staff is recommended as a first step. These voluntary pre-meetings give applicants an opportunity to discuss their establishments, review the applicability requirements, and ask detailed questions about the C3 process and available benefits.

The actual application process begins when the applicant provides public notice and the opportunity for public review of its completed application and supporting materials. At this time the applicant also provides a list of permits, licenses, and binding agreements to the DEQ; and a compliance review is conducted by the department. After this 30-day public review and if no compliance issues are raised,

the candidate submits the application and materials to the DEQ for review and subsequent approval or denial of C3 designation. The designation must be renewed once every two or three years depending on whether or not their EMS is certified under the ISO 14001:2004 standard. All C3's are required to submit an annual report, certifying compliance with applicable state and federal environmental requirements and reporting on goals and targets for their EMS and P2 programs.



***Application pre-meetings are available upon request.  
For assistance during any phase of the C3 application  
process, contact the Office of Environmental  
Assistance at 800-662-9278.  
Applications can be mailed to:***

**Pollution Prevention & Compliance Assistance Section  
Office of Environmental Assistance  
Michigan Department of Environmental Quality  
PO Box 30457  
Lansing, MI 48909-7957**

## EMS Close-Up

### What is an Environmental Management System (EMS)?

An EMS is a voluntary system for identifying, controlling, and monitoring the regulated and nonregulated activities at a facility that could impact the environment. The EMS concept was developed by industry as a proactive way to:

- ✓ Improve environmental performance beyond that required by regulation.
- ✓ Create a more “level playing field” in environmental control in the world market.
- ✓ Provide a competitive advantage.
- ✓ Give credibility to environmental programs.

### What does an EMS look like?

There is not one single type of EMS, but there are standards or formats to follow in developing a system. The most well-known and widely used EMS standard in the United States and the world is the International Organization for Standardization (ISO) standard, ISO 14001. The C3 EMS criteria reference the ISO 14001:2004 standard. Some of the elements of an EMS are:

- ✓ Operational control through work instructions and procedures.
- ✓ Employee environmental training.
- ✓ Emergency response planning.
- ✓ Environmental recordkeeping and reporting.

Most likely, a facility already has programs and documents that satisfy most of the common elements. One might only need to formalize facility procedures and documents so the programs can be managed in a logical and accessible manner.

### What are the benefits of an EMS?

A facility can reap numerous business benefits from EMS development in addition to those provided by C3 designation. These benefits include:

- Reduced costs – Facilities that have implemented EMS report improved operating efficiency through the focus on important issues, the development of standard procedures, and through increased employee training.
- Competitive advantage – Consumers and manufacturers are giving preference to products from environmentally responsible suppliers.
- Improved image – The local community, environmental regulators, and environmental groups see EMS development as an indication of a facility's willingness to be a responsible citizen and to go beyond compliance. They will be willing to recognize and reward those efforts.
- Enhanced regulatory compliance – The adoption of procedures and work instructions and the additional training will add consistency and stability to the environmental programs and reduce a facility's liability.
- Improved environmental performance – The systematic identification of potential environmental impacts and the on-going setting and achievement of goals to control those impacts will ultimately lead to improved performance and a cleaner environment.

*For further information on how to develop an EMS specific to your facility, the Office of Environmental Assistance has an “Environmental Management System Guidance Manual” available. The manual is designed in workbook format to take you step-by-step through the process of developing an EMS. Medium and large establishments can use it as a resource to learn more about the necessary elements of an EMS and its value. Contact the Environmental Assistance Center at 800-662-9278 to learn more.*