Most states don’t inspect minor air pollution sources, and aren’t taking delegation of the Area Source NESHAPs

EPA has few resources to inspect all of the Area Source NESHAPs

How do you increase the number of emissions sources you inspect without more staff?
Region 5 SBEAPs’ Solution to 6H Problem

Question: How to reach 12,000 autobody shops in Region 5 to ensure compliance w/area source NESHAP?
  o Relying on SBEAPs and compliance assistance tools to reach them all.
  o How do we also get Region 5 EPA involved since they have primary enforcement role?

Answer: Use EPA’s state innovation grant for “ERP” on autobody refinishing sector in Region 5.
  o Combined population of shops in six states
  o Enlisted EPA Region 5 air enforcement as partner
  o Focused on urban areas and the new surface coating area source NESHAP (40 CFR, Part 63, subpart HHHHHH = 6H)

What is ERP?

Environmental Results Program
  Use statistical approach to measure compliance within a sector
    o Select key regulatory and best practices to measure
  Report results on selected practices based on observed measurement
    o Inspect random sample of sources in industry sector
    o Before and after compliance assistance
  Facility self-audit and certification offers insight into their perception of performance
    o Not part of statistical measurement of compliance rates
  Targeted enforcement or assistance follow-up based on results
Motivation from Another Multistate ERP

- **Common Measures Project**
  - [http://www.newmoa.org/erp/projects/commeas.cfm](http://www.newmoa.org/erp/projects/commeas.cfm)
  - Massachusetts, Colorado, Connecticut, Maine, New Hampshire, New York, Rhode Island, and Vermont participated fully
  - Washington and California observed
  - focus on Small Quantity Generators (SQGs) of hazardous waste

- **Results of Interest to Region 5 SBEAPs:**
  - full service assistance programs appear to be associated with higher performance levels on both compliance and “beyond compliance” (BMP) indicators
  - frequency of inspections and enforcement actions (the traditional compliance approach) did not appear to affect performance levels.

Project Development
Region 5 SBEAPs and EPA staff met in May 2008 to discuss ideas for ERP and big area source rules coming.

Region 5 EPA sent letter to States encouraging participation, before grant solicitation.
- Cheryl Newton email to state Air Program Directors, September 24, 2008

Once awarded, WI created a MOA for all states to sign-on and agree to use SBEAP staff time.

Region 5 ERP Phases:
- SBEAPs conduct baseline site visits, random sample
- Used ERP self-certification to satisfy 6H notification
- Region 5 EPA staff conduct follow-up inspections, random sample
- WI/NEWMOA conduct statistical analysis and draft report

SBEAPs developed inspection checklist in small group:
- make sure thorough, yet easy to understand
- Project co-lead and QA officer ensured statistical validity of question format

Training before starting baseline visits:
- statistical principals to ensure proper sampling and data collection
- key regulatory issues and interpretation

Regular calls among SBEAPs and EPA staff to respond to issues and interpretation questions.

Similar effort on Self-certification checklist as inspection checklist.

Training repeated for EPA inspectors:
- discussed lessons-learned from baseline on approaching shops
- Project co-lead as single point of contact for questions on sampling, etc. during inspections

Data entry of baseline checklists, EPA checklists, and self-certification checklists all QA’d by WI staff and NEWMOA.
Sharing the information so field staff could review as needed:

- [http://dnr.wi.gov/topic/CompAssist/sb/Autobodyerptraining.html](http://dnr.wi.gov/topic/CompAssist/sb/Autobodyerptraining.html)

Page ‘orphaned’
- only partners given the web page in case search by shops brought it up
- still doesn’t come up in web search

---

**Practices Associated with subpart 6H**

<table>
<thead>
<tr>
<th>EBPIs</th>
<th>Question(s) in Checklist</th>
</tr>
</thead>
<tbody>
<tr>
<td>% using HVLP or equivalent high transfer efficiency technology</td>
<td>I6</td>
</tr>
<tr>
<td>% with high transfer efficiency painting training in place</td>
<td>B2a</td>
</tr>
<tr>
<td>% with different components of training</td>
<td>B2b</td>
</tr>
<tr>
<td>% using hands-on or classroom-only training</td>
<td>B2b</td>
</tr>
<tr>
<td>% with documentation of training</td>
<td>B2c</td>
</tr>
<tr>
<td>% at which all spray-applied coatings used in enclosed booth or prep station</td>
<td>C3, I1, I3</td>
</tr>
<tr>
<td>% of booths/stations fitted with particle filters</td>
<td>C4b, I2, I4</td>
</tr>
<tr>
<td>% of booths/stations fitted with filter/system achieving 98% capture</td>
<td>C4cEd</td>
</tr>
<tr>
<td>% where spray gun cleaning is done with enclosed or non-atomizing washers</td>
<td>C5, I7</td>
</tr>
<tr>
<td>% maintaining MSDS or formulation records for all solvents/coatings used</td>
<td>C9</td>
</tr>
<tr>
<td>% maintaining records of the amount/content of coatings containing HAPs</td>
<td>C10</td>
</tr>
<tr>
<td>% NOT using paint strippers containing Methylene Chloride</td>
<td>C6, I8</td>
</tr>
<tr>
<td>% keeping records to document annual MeCl usage</td>
<td>C7</td>
</tr>
<tr>
<td>Average and range of MeCl used</td>
<td>C7b</td>
</tr>
<tr>
<td>% of MeCl users with written MeCl minimization plan</td>
<td>C8</td>
</tr>
<tr>
<td>% maintaining records of the amount of coatings containing VOC and HAP</td>
<td>A6</td>
</tr>
</tbody>
</table>
### Key Indicators continued...

<table>
<thead>
<tr>
<th>EBPIs</th>
<th>Question(s) in Checklist</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AIR PRACTICES</strong></td>
<td></td>
</tr>
<tr>
<td>• Paint hours per year</td>
<td>A7</td>
</tr>
<tr>
<td>• Average quantity and range of coatings used</td>
<td>A6</td>
</tr>
<tr>
<td>• % using dustless vacuum or overhead capture equipment</td>
<td>F1</td>
</tr>
<tr>
<td>• % meeting applicable state requirements</td>
<td>Varied</td>
</tr>
<tr>
<td><strong>AIR RECORD KEEPING:</strong></td>
<td></td>
</tr>
<tr>
<td>• Average use of high VOC and low VOC coatings and solvents per year</td>
<td>A6</td>
</tr>
<tr>
<td><strong>HAZARDOUS WASTE</strong></td>
<td></td>
</tr>
<tr>
<td>• Average and range of maximum amount of RCRA waste the facility generates in a month</td>
<td>D3</td>
</tr>
<tr>
<td>• Numbers of facilities in generator classes (CESQG or VSQG, SQG, LQG or not)</td>
<td>D3</td>
</tr>
<tr>
<td><strong>INDUSTRIAL WASTERWATER INDICATORS</strong></td>
<td></td>
</tr>
<tr>
<td>• % of facilities not discharging IWW to surface water</td>
<td>E2</td>
</tr>
<tr>
<td>• % of facilities not discharging IWW to a storm, sanitary or combined sewer system</td>
<td>E2</td>
</tr>
<tr>
<td><strong>POLLUTION PREVENTION-ENERGY EFFICIENCY INDICATORS</strong></td>
<td></td>
</tr>
<tr>
<td>• % of facilities taking one or more actions to conserve energy over the past three years (distribution across menu of possible actions)</td>
<td>G1</td>
</tr>
<tr>
<td>• % of facilities taking one or more actions to reduce pollution (VOC, PM and toxics) the past three years (distribution across menu of possible actions)</td>
<td>F1</td>
</tr>
</tbody>
</table>

### State Regulatory Overlap

- **State VOC RACT Rules in Some Urban Areas**
  - IL, MI, OH, WI had rules for autobody shops in many urban counties
  - IN autobody rules applied state-wide
  - for IL we removed Chicago/Cook County b/c VOC RACT and County Ordinances more stringent

- **State Rules Included Similar Requirements:**
  - HVLP guns
  - VOC content limits
  - enclosed gun cleaning
  - some also include use of paint booth
### Urban Population and Sampling

#### Region 5 Urban Universe of Autobody Refinishing Shops (Counties with highest population in each state)

<table>
<thead>
<tr>
<th>States</th>
<th>IL</th>
<th>IN</th>
<th>WI</th>
<th>MN</th>
<th>OH</th>
<th>WI</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline</td>
<td>1225</td>
<td>489</td>
<td>877</td>
<td>675</td>
<td>1347</td>
<td>456</td>
<td>5069</td>
</tr>
<tr>
<td>Follow-up</td>
<td>1233</td>
<td>380</td>
<td>858</td>
<td>520</td>
<td>1422</td>
<td>394</td>
<td>4797</td>
</tr>
</tbody>
</table>

#### Round 1 (Baseline) Target and Actual Sample Sizes

<table>
<thead>
<tr>
<th>States</th>
<th>Illinois</th>
<th>Indiana</th>
<th>Michigan</th>
<th>Minnesota</th>
<th>Ohio</th>
<th>Wisconsin</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Sample Size</td>
<td>34</td>
<td>15</td>
<td>25</td>
<td>19</td>
<td>38</td>
<td>15</td>
<td>146</td>
</tr>
<tr>
<td>Actual Visits Completed</td>
<td>35</td>
<td>19</td>
<td>27</td>
<td>20</td>
<td>38</td>
<td>17</td>
<td>156</td>
</tr>
<tr>
<td>Difference from target</td>
<td>1</td>
<td>4</td>
<td>2</td>
<td>1</td>
<td>0</td>
<td>2</td>
<td>10</td>
</tr>
</tbody>
</table>

#### Round 2 (Post) Target and Actual Sample Sizes

<table>
<thead>
<tr>
<th>States</th>
<th>Illinois</th>
<th>Indiana</th>
<th>Michigan</th>
<th>Minnesota</th>
<th>Ohio</th>
<th>Wisconsin</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Sample Size</td>
<td>34</td>
<td>15</td>
<td>25</td>
<td>19</td>
<td>38</td>
<td>15</td>
<td>146</td>
</tr>
<tr>
<td>Actual Inspections Completed</td>
<td>34</td>
<td>15</td>
<td>25</td>
<td>19</td>
<td>38</td>
<td>15</td>
<td>146</td>
</tr>
<tr>
<td>Difference from target</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

### Compliance Assistance Effort

<table>
<thead>
<tr>
<th>State</th>
<th>Events</th>
<th>Articles - Publication</th>
<th>Online Training Materials</th>
<th>Factsheets/ Postcards</th>
</tr>
</thead>
<tbody>
<tr>
<td>IL</td>
<td>17 (825)</td>
<td>Clean Air Clips: Feb and Oct, 2011</td>
<td>Region 5 ERP Webpage (8223)</td>
<td>3 Factsheets</td>
</tr>
<tr>
<td>IN</td>
<td>9 (334)</td>
<td>CTAP Hot Topic: Jan 2010</td>
<td>• Collision Repair Assistance website • Region 5 ERP Webpage (8223)</td>
<td>1 Factsheet and Compliance Manual</td>
</tr>
<tr>
<td>MI</td>
<td>32 local, 1 webinar (70)</td>
<td>DNRE Web Article</td>
<td>• Checklist Tutorial (328) &amp; Rule Overview Video (381) • Webpage &amp; Region 5 ERP Webpage (8223)</td>
<td>4 Factsheets</td>
</tr>
<tr>
<td>MN</td>
<td>5 (88)</td>
<td>• AASP-MN: 10/09, 1/10, 3/10, 7/10, 11/10 (2) • MN SBEAP Enterprise, Fall 2010</td>
<td>Webpage &amp; Region 5 ERP Webpage (8223)</td>
<td>4 Factsheets Initial &amp; Reminder Postcards</td>
</tr>
<tr>
<td>OH</td>
<td>31 (1030)</td>
<td>OCAPP Newsletter: Winter 08, Summer 09, Fall10</td>
<td>Webpage &amp; Region 5 ERP Webpage (8223)</td>
<td>2 Email Reminders 1 Reminder Postcard</td>
</tr>
<tr>
<td>WI</td>
<td>13 (465)</td>
<td>• The Autobody Journal, June/July 2008 • WACTAL Newsletter, 2010</td>
<td>Region 5 ERP Webpage (8223) total Pageviews; 1972 files 3 mo in 2010 – limited document data</td>
<td>3 Factsheets 1 Reminder Postcard</td>
</tr>
</tbody>
</table>
WI Hosts Multistate Web Page:
http://dnr.wi.gov/topic/CompAssist/sb/Autobody.html

Region 5 Webpage Use

Region 5 ERP Webpage Activity

Counts:

- Page Hits
- Documents

Region 5 Autobody ERP Results
Project Results

Region 5 Shop Characteristics

![Bar Chart]

- Services
  - Autobody Repair
  - Mechanical Repair
  - Other
  - Car Wash
  - Car Dealership
  - Salvage Yard
  - Mobile Paint Service

- Percentage of Shops

- Baseline
- Self-certification
- Follow-up
**Key Indicator — All Spraying in Booths**

<table>
<thead>
<tr>
<th></th>
<th>No Evidence of Spraying Outside Booth</th>
<th>Total Response</th>
<th>% All Spraying in Booth</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Baseline</strong></td>
<td>114</td>
<td>148</td>
<td>77%</td>
</tr>
<tr>
<td><strong>EPA Followup</strong></td>
<td>134</td>
<td>143</td>
<td>93.7%</td>
</tr>
</tbody>
</table>

*Statistically significant difference, if simple random sample.*

---

**Key Indicator — Use Enclosure and Filters 98%**

<table>
<thead>
<tr>
<th></th>
<th>Primary Booth Comply</th>
<th>Total Response</th>
<th>% Primary Booth Comply</th>
<th>Prep Area Comply</th>
<th>Total Response</th>
<th>% Prep Area Comply</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Baseline</strong></td>
<td>80</td>
<td>148</td>
<td>60.6%</td>
<td>18</td>
<td>69</td>
<td>26.1%</td>
</tr>
<tr>
<td><strong>EPA Followup</strong></td>
<td>91</td>
<td>138</td>
<td>65.9%</td>
<td>27</td>
<td>39</td>
<td>69.2%</td>
</tr>
</tbody>
</table>

*BOTH are statistically significant difference, if simple random sample.*
### Key Indicator — Paint Guns HVLP

<table>
<thead>
<tr>
<th></th>
<th>Yes, Have ONLY Compliant Guns</th>
<th>Total Response</th>
<th>% ONLY Compliant Guns</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline</td>
<td>90</td>
<td>155</td>
<td>64.3%</td>
</tr>
<tr>
<td>EPA Followup</td>
<td>83</td>
<td>123</td>
<td>67.5%</td>
</tr>
</tbody>
</table>

- **NOTE:** We counted ANY non-compliant gun against them. Most states already had HVLP regs in urban counties.

- Not statistically significant difference

### Key Indicator — Gun Cleaning

<table>
<thead>
<tr>
<th></th>
<th>Fully Enclosed Gun Cleaning</th>
<th>Total Response</th>
<th>% Fully Enclosed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline</td>
<td>133</td>
<td>155</td>
<td>85.8%</td>
</tr>
<tr>
<td>EPA Followup</td>
<td>127</td>
<td>144</td>
<td>88.2%</td>
</tr>
</tbody>
</table>

- Not statistically significant difference
### Key Indicator – Painter Training

<table>
<thead>
<tr>
<th></th>
<th>Painters Trained</th>
<th>Total Response</th>
<th>% Painters Trained</th>
<th>Training Records</th>
<th>Total Response</th>
<th>% Have Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline</td>
<td>77</td>
<td>155</td>
<td>49.7%</td>
<td>63</td>
<td>142</td>
<td>44.4%</td>
</tr>
<tr>
<td>EPA Followup</td>
<td>118</td>
<td>146</td>
<td>80.8%</td>
<td>120</td>
<td>144</td>
<td>83.3%</td>
</tr>
</tbody>
</table>

*BOTH statistically significant difference, if simple random sample.*

### Shop Staffing

![Chart showing Painter on Staff and Trained](chart.png)
### Key Indicator — No MeCl in Paint Strippers

<table>
<thead>
<tr>
<th></th>
<th>Use No MeCl in Paint Strippers</th>
<th>Total Response</th>
<th>% Without MeCl</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline</td>
<td>4</td>
<td>26</td>
<td>15.4%</td>
</tr>
<tr>
<td>EPA Followup</td>
<td>2</td>
<td>20</td>
<td>10.0%</td>
</tr>
</tbody>
</table>

- Not statistically significant difference

### Key Indicator - Received Information on Rule

<table>
<thead>
<tr>
<th></th>
<th>Yes, Received Info</th>
<th>Total Response</th>
<th>% Received Info</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline</td>
<td>107</td>
<td>142</td>
<td>75.4%</td>
</tr>
<tr>
<td>EPA Followup</td>
<td>128</td>
<td>142</td>
<td>90.1%</td>
</tr>
</tbody>
</table>

- Statistically significant difference, if simple random sample.
### Key Indicator - Initial Notification

<table>
<thead>
<tr>
<th></th>
<th>Yes, Submitted Form</th>
<th>Total Response</th>
<th>% Submit</th>
<th>Differed on EPA List</th>
<th>Actual # Submit</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline</td>
<td>92</td>
<td>156</td>
<td>59%</td>
<td>30</td>
<td>100</td>
<td></td>
</tr>
<tr>
<td>EPA Followup</td>
<td>99</td>
<td>138</td>
<td>71.5%</td>
<td>31</td>
<td>91</td>
<td>7 w/o initial submitted NOCS</td>
</tr>
</tbody>
</table>

- Statistically significant difference, if simple random sample.

### Self-Certification Response

- Total Self-Certifications Mailed: 11549
- Total Self-Certification Responses: 2597 or 22.5%

![Graph showing State Self-Certification Response Rates: Numbers and Percentage]
**Other Notification Submittals**

- EPA R5 had 15,000 notifications received on 6H, compared with 10,500 on 6C
  - Gas stations have much larger number of sources than autobody, possibly double, so notifications submitted should be higher
  - Exemption from notification for gas stations under 10,000 gal/mo shouldn’t have reduced the number of notifications by that much
- 6H rates in other states/regions...?

**Facility Scores on Indicators**

- Calculated as:
  - \[
    \left( \frac{\text{# observations match preferred response}}{\text{total # observations}} \right) \times 10
  \]
  - so...
    - all match = 10
    - half match = 5
- Graphs show # facilities with each score
- Out of long list of indicators
  - made sure to use only yes/no responses
  - those that were confirmed by observations
  - measured in both baseline and follow-up
Facility Score Indicators

**Compliance**

- B2a.: All painters have had full training required by 6H
- B2c.: Have 6H training records
- C4d(i): Have booth filter efficiency documentation
- C4d(v): Have prep filter efficiency documentation
- C5a.: All spray gun cleaning complies
- C7a.: Have paint stripping records for MeCl paint stripping
- C8a.: Have MeCl minimization plan
- C13.: Initial notification submitted
- I1b.: No spraying outside booths
- I1c.: All booth enclosures comply
- I2d.: All booth exhaust/filter systems comply
- I3b.: All prep enclosures comply
- I4d.: All prep exhaust/filter systems comply
- I6b.: All spray guns comply

**EBPIs**

- B2a.: All painters have had full training required by 6H
- B2c.: Have 6H training records
- C1a.: Have at least one spray booth
- C4d(i): Have booth filter efficiency documentation
- C4d(v): Have prep filter efficiency documentation
- C5a.: All spray gun cleaning complies
- C7a.: Have paint stripping records for MeCl paint stripping
- C8a.: Have MeCl minimization plan
- C9.: Have MSDS available
- C13.: Initial notification submitted
- I1c.: All booth enclosures comply
- I2d.: All booth exhaust/filter systems comply
- I3b.: All prep enclosures comply
- I4d.: All prep exhaust/filter systems comply
- I6b.: All spray guns comply
- I8b.: No paint stripping products with MeCl

**Results Tell the Story — Region Wide**

**Compliance**

<table>
<thead>
<tr>
<th>Difference Between Rounds</th>
<th>Compliance Score</th>
<th>Confidence Intervals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average Facility Score*</td>
<td>YES</td>
<td>20.0</td>
</tr>
<tr>
<td>Median Facility Score</td>
<td>nc</td>
<td>nc</td>
</tr>
<tr>
<td>Aggregate Achievement Rate*</td>
<td>nc</td>
<td>nc</td>
</tr>
<tr>
<td>&quot;Full Achievement&quot; Rate (Achievement Rate across All Measures*)</td>
<td>YES</td>
<td>9.2</td>
</tr>
<tr>
<td>Percent of Facilities Achieving At Least One Measure</td>
<td>no</td>
<td>-0.8</td>
</tr>
</tbody>
</table>
## Results Tell the Story — Region Wide

<table>
<thead>
<tr>
<th>EBPIs</th>
<th>Difference Between Rounds</th>
<th>Confidence Intervals</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Statistically Significant?</td>
</tr>
<tr>
<td></td>
<td>Average Facility Score*</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Median Facility Score</td>
<td>nc</td>
</tr>
<tr>
<td></td>
<td>Aggregate Achievement Rate*</td>
<td>nc</td>
</tr>
<tr>
<td></td>
<td>&quot;Full Achievement&quot; Rate (Achievement Rate across All Measures*)</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Percent of Facilities Achieving At Least One Measure</td>
<td>no</td>
</tr>
</tbody>
</table>

## Results — State by State

### Illinois
- low 6's
- mid 7's
- Δ 1.2

### Indiana
- low 6's
- low 7's
- Δ 1.0
Results — State by State

Ohio
- high 5’s
- low-mid 7’s
- Δ 1.5

Minnesota
- low 6’s
- mid 7’s
- Δ 1.5

Michigan
- low 5’s
- mid 7’s
- Δ 2-2.5

Wisconsin
- mid 5’s
- mid 7’s - 8
- Δ 2-3
Observations on Results

- Many Key Indicators Show High Rates of Improvement
  - MeCl use very low anyway, so small improvement has little impact on emissions
  - State RACT overlap may influence other results

- Similar Trends in Baseline and Follow up
  - baseline all fairly flat, spread across all scores
  - follow up have nice curve upward, with majority in higher scores
  - state to state differ slightly in averages

- Stronger Trends With More Compliance Assistance
  Relative to Population?

Compliance Assistance Effort

<table>
<thead>
<tr>
<th>State</th>
<th>Events (#)</th>
<th>Articles - Publication</th>
<th>Online Training Materials</th>
<th>Factsheets/Postcards</th>
</tr>
</thead>
<tbody>
<tr>
<td>IL</td>
<td>17 (825)</td>
<td>Clean Air Clips: Feb and Oct, 2011</td>
<td>Region 5 ERP Webpage (8223)</td>
<td>3 Factsheets</td>
</tr>
</tbody>
</table>
| IN    | 9 (334)    | CTAP Hot Topic: Jan 2010 | • Collision Repair Assistance website  
• Region 5 ERP Webpage (8223) | 1 Factsheet and Compliance Manual |
| MI    | 32 local, 1 webinar (70) | DNRE Web Article | • Checklist Tutorial (328) & Rule Overview Video (381)  
• Webpage & Region 5 ERP Webpage (8223) | 4 Factsheets |
| MN    | 5 (88)     | • AASP-MN: 10/09, 1/10, 3/10, 7/10, 11/10 (2)  
• MN SBEAP Enterprise, Fall 2010 | Webpage & Region 5 ERP Webpage (8223) | 4 Factsheets Initial & Reminder Postcards |
| OH    | 31 (1030)  | OCAPP Newsletter; Winter 08, Summer 09, Fall10 | Webpage & Region 5 ERP Webpage (8223) | 2 Email Reminders  
1 Reminder Postcard |
| WI    | 13 (465)   | • The Autobody Journal, June/July 2008  
• WACTAL Newsletter, 2010 | Region 5 ERP Webpage (8223) total Pageviews: 1972 files 3 mo in 2010 – limited document data | 3 Factsheets  
1 Reminder Postcard |
**IL Observations**

- We put a lot of effort into workshops throughout the state, and partnered with the SBDCs for most of them.
  - Generally well attended, but the best responses came when we worked with the SBDCs that were in a community college – especially with the two locations that had autobody programs in their community colleges.
  - One of those colleges expressed interest in offering the 6H training as an ongoing effort so I shared my materials to use for their program.
- I also did some workshops that were organized by paint suppliers and they went very well.
  - The vendors were able to offer dinner with the presentations and I think that helped draw more people in.
- Sent emails to the suppliers I worked with and those that I met while holding workshops to give them updates on autobody related issues in Illinois, but I have not gotten much of a response from those emails.
  - One let the suppliers know that Illinois had changed its rules to allow shops in our nonattainment areas the flexibility to use the USEPA approved alternative paint guns authorized in the 6H rule
  - Previously only allowed HVLP and electrostatic guns in the nonattainment areas.

**IN Observations**

- IN also worked with numerous vocational schools, auto body associations and suppliers; and partnered with EPA on presentations
  - One of the largest was in partnership with EPA titled the "Best Practices for Auto Body/Collision Repair Shops in Fort Wayne and Surrounding Counties in Northeast Indiana."
    - Jacqueline Nwia and Rae Trine, both with EPA Region 5 helped to organize and presented at this event.
    - The Indiana Auto Body Association (IABA) was involved to some extent. Ivy-Tech hosted this event.
- IN participated in the IABA biannual convention in 2011, hosted by Lincoln College of Technology.
- IN created a Collision Repair assistance website www.in.gov/idem/ctap/2360 with a compliance manual and links to the Region V ERP page.
- With the exception of PPG, we found most paint manufacturers and jobbers were hesitant to work with IDEM, and preferred educating their customers with their own training.
MI Observations

- The partnership created between the Automotive Service Association of MI and numerous vendors really helped to make this work.
  - The vendors set up several meetings here and the attendance was always very high.
- Another important aspect was the enforcement angle.
  - The threat of possible inspections made these shops take note and institute many changes they might not have otherwise done (i.e. shops took it seriously).
  - Having EPA inspectors actually follow up by doing some targeted inspections helped to legitimize this message. Although there were limited inspections word traveled quickly.
- This was an excellent example of compliance assistance and enforcement working together to accomplish some positive results.

MN Observations

- Partnered with the Association of Automotive Service Providers – Minnesota (AASP-MN)
  - publish articles in their newsletter,
  - got the word out to lots of shops through a trusted source
- Combined messaging: mailings from the state, information from the association, and word of mouth efforts through vendors
  - helped strengthen the message
  - reminder postcard helped keep the regulation on the minds of the shops; as a result, shops would call with questions
- Shops took the regulation more seriously because they knew EPA would be inspecting
  - validating to shops, too, that EPA took them seriously enough to inspect them
  - liked that EPA inspections would level the playing field because the ‘bad actors’ in the industry would be less likely to get away with not following regulations
  - Shops being aware of the regulation also helped with the reception EPA received at follow-up inspections. For the most part, shops were more comfortable with an inspector because they knew why they were being inspected.
- Sector-based outreach makes it easy to tailor the info
  - using a statistical approach was different from how we’ve done it in the past
  - ERP set up allowed us to go beyond ‘beans’ and measure outcomes
OH Observations

- We did a lot of 6H workshops through the paint suppliers.
  - They set up the venue and invited their customers, and we just showed up and presented. No organizing logistics or invitees on our part — very easy. All 20+ workshops were very well attended.
  - It seemed to snowball from one supplier, then two, three, etc. Some suppliers had repeat events around the state, and some had “refresher” events around the final 6H compliance date.
  - We didn’t have to beg suppliers to host these workshops. They came to us proactively and that was very different.
- Seemed that either the Jeff Gordon video (which they liked) or corporate info from PPG, Sherwin-Williams, DuPont helped to “legitimize” the EPA 6H rule as industry best practices and the right way to operate.
- The workshops led to us amassing a 50+ “6H supplier contact” email list to push out any news about 6H.
  - We sent several email updates assuming the suppliers would then forward to their customers. We have no proof, however, that actually occurred.
- The Region 5 inspections created a buzz in the industry that 6H was real, and people were checking on it. (Until then, there had been no real 6H inspections done as Ohio does not have delegation for the rule).

WI Observations

- Echo many of the same comments as other states in that we had more direct involvement and interest from trade association groups.
  - many local associations invited me to their dinner meetings
  - most run by a local jobber, but some by larger shop owners
  - also attended annual/biannual meetings with table or presentation or booth to share information
- Using the baseline visits as a way to learn more about the industry was new, since this was an industry I wasn’t familiar with.
  - needed to adjust understanding as we went
  - also helped me to clarify presentations later on, and provide clear examples of how I saw the rule working for different scenarios
  - suggesting EPA had more interest and would be inspecting made an impact on the level of interest from shops owners.
Early EPA Inspector Observations...

- **Interesting take-away’s from visits:**
  - calling ahead (which is not SOP for EPA)
    - seems to improve attitude during inspection
    - ensures efficient trips, visit multiple in same area
    - know shop is actively operating and is affected source
  - shops support regulation and want to comply
  - many shops not interested in exemption even if eligible
  - shops felt validated by actually getting visited by federal inspector

Questions?

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