

Innovative Regional Partnership for Rule Implementation and Measuring Compliance

The Region 5 Autobody Environmental Results Program



Renée Lesjak Bashel

National Meeting on Environmental Compliance Assurance and Performance
Measurement Strategies, June 19, 2013

Do Businesses Comply with the Area Source NESHAPs?

- ⌘ 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?**
 - Relying on SBEAPs and compliance assistance tools to reach them all.
 - 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.**
 - Combined population of shops in six states
 - Enlisted EPA Region 5 air enforcement as partner
 - 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
 - Select key regulatory and best practices to measure
- ⌘ Report results on selected practices based on observed measurement
 - Inspect random sample of sources in industry sector
 - Before and after compliance assistance
- ⌘ Facility self-audit and certification offers insight into their perception of performance
 - 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>
- 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



Partnership Among Six States & EPA

- ⌘ 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

QA Steps to Ensure Success

- ⌘ 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

Training Materials Web Page

∞ Sharing the information so field staff could review as needed:

- <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

Key Indicators to Measure

EBPIs	Question(s) in Checklist
Practices Associated with subpart 6H	
• % using HVLP or equivalent high transfer efficiency technology	I6
• % with high transfer efficiency painting training in place	B2a
• % with different components of training	B2b
• % using hands-on or classroom-only training	B2b
• % with documentation of training	B2c
• % at which all spray-applied coatings used in enclosed booth or prep station	C3, I1, I3
• % of booths/stations fitted with particle filters	C4b, I2, I4
• % of booths/stations fitted with filter/system achieving 98% capture	C4c&d
• % where spray gun cleaning is done with enclosed or non-atomizing washers	C5, I7
• % maintaining MSDS or formulation records for all solvents/coatings use	C9
• % maintaining records of the amount/content of coatings containing HAPs	C10
• % NOT using paint strippers containing Methylene Chloride	C6, I8
• % keeping records to document annual MeCl usage	C7
• Average and range of MeCl used	C7b
• % of MeCl users with written MeCl minimization plan	C8
• % maintaining records of the amount of coatings containing VOC and HAP	A6

Key Indicators continued...

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

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)							
States	IL	IN	MI	MN	OH	WI	Totals
Baseline	1225	489	877	675	1347	456	5069
Follow-up	1223	380	858	520	1422	394	4797
Difference	-2	-109	-19	-155	75	-62	-272

Round 1 (Baseline) Target and Actual Sample Sizes

States	Illinois	Indiana	Michigan	Minnesota	Ohio	Wisconsin	Totals
Target Sample Size	34	15	25	19	38	15	146
Actual Visits Completed	35	19	27	20	38	17	156
Difference from target	1	4	2	1	0	2	10

Round 2 (Post) Target and Actual Sample Sizes

States	Illinois	Indiana	Michigan	Minnesota	Ohio	Wisconsin	Totals
Target Sample Size	34	15	25	19	38	15	146
Actual Inspections Completed	34	15	25	19	38	15	146
Difference from target	0	0	0	0	0	0	0

Compliance Assistance Effort

State	Events	Articles - Publication	Online Training Materials	Factsheets/ Postcards
IL	17 (825)	Clean Air Clips: Feb and Oct, 2011	Region 5 ERP Webpage (8223)	3 Factsheets
IN	9 (334)	CTAP Hot Topic: Jan 2010	<ul style="list-style-type: none"> Collision Repair Assistance website Region 5 ERP Webpage (8223) 	1 Factsheet and Compliance Manual
MI	32 local, 1 webinar (70)	DNRE Web Article	<ul style="list-style-type: none"> Checklist Tutorial (328) & Rule Overview Video (381) Webpage & Region 5 ERP Webpage (8223) 	4 Factsheets
MN	5 (88)	<ul style="list-style-type: none"> 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)	<ul style="list-style-type: none"> 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

WI Hosts Multistate Web Page:

<http://dnr.wi.gov/topic/CompAssist/sb/Autobody.html>

Autobody shop environmental compliance assistance

The DNR and the Small Business Clean Air Assistant Program (SBCAAP) collaborated with the Small Business Environmental Assistance program in Illinois, Indiana, Michigan, Minnesota and Ohio to develop an Environmental Assistance Program (EAP) for the autobody refinishing shops in these U.S. Environmental Protection Agency (EPA) Region 5 states. The EAP project involved conducting feasibility study at about 18 shops where shops needed additional assistance in understanding how to comply with state and federal rules. A particular focus was on a new rule from the EPA affecting autobody shops nationwide. Based on what the states learned at the feasibility work, the following materials were developed to assist in the areas of greatest need.

Shop compliance checklist packets and training

The shops have developed a number of checklists with state specific tips on how to know whether you are in compliance with EPA's rule as well as state air, water and other requirements. Completing the first part of the checklist (a "20A - Shop" section) will help you make sure you have met all the requirements in EPA's rule.

Based on compliance responses collected from this checklist, the program can develop additional tools to help shops ensure they comply.

Material referenced in the checklist that provide additional information about particular requirements are listed in the specific check table on the page. Additional materials helpful to shops in any state are provided in the [ER 20A-Shop](#) section on this page, including resources for permit training.

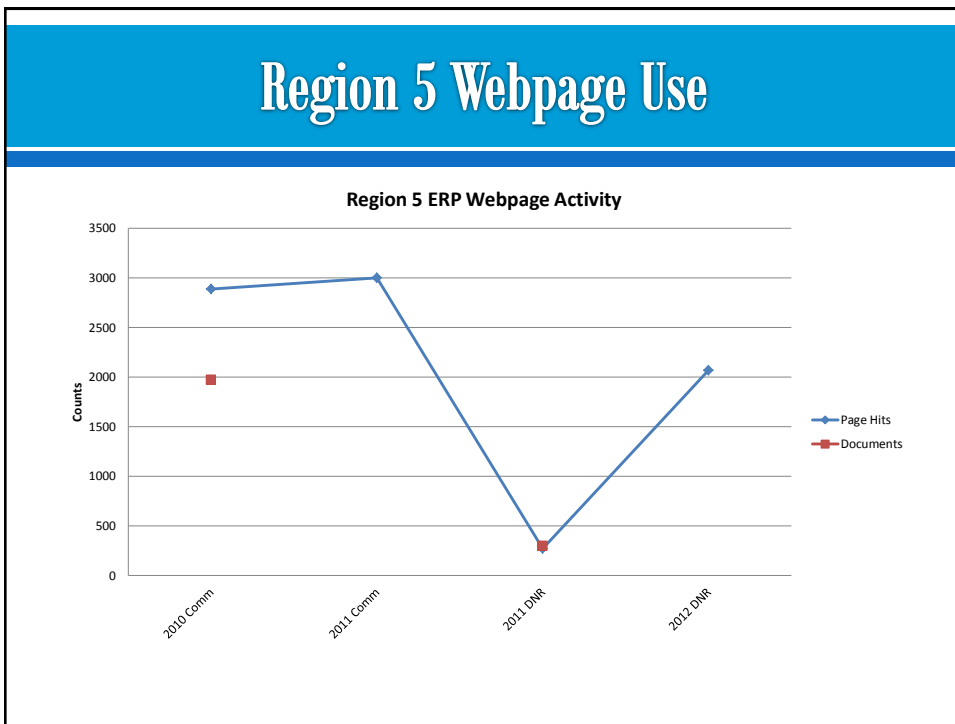
Certification on use of 20-A-Shop cases Small amounts of any type of paint may be sprayed on the shop floor if it does not last 2 months or less and is used. However, be aware that there are still health requirements that would apply to the handling of flammable liquids. Also, excessive amounts being sprayed using 20-A-Shop Case 2-A, a vehicle vehicle may be used by EPA as circumvention of the rule and a violation.

Step 1 - Complete the self-certification checklist

- Printable copies of the self-certification checklist are available in the table below, in both Microsoft Word and Adobe PDF versions.
- You have the option to extend the checklist online. [Click here](#).
- Complete the checklist for each shop. The online program will save if you pause for

Verified Information:

- The shop certification checklist
- Permit development and enforcement checklist for shops
- EPA 20A-Shop
- Small business environmental help 20A-Shop
- EPA 20A-Shop
- EPA 20A-Shop



Project Results

∞ ∞



Key Indicator – All Spraying in Booths

	No Evidence of Spraying Outside Booth	Total Response	% All Spraying In Booth
Baseline	114	148	77%
EPA Followup	134	143	93.7%

⚡ Statistically significant difference, if simple random sample.

Key Indicator – Use Enclosure and Filters 98%

	Primary Booth Comply	Total Response	% Primary Booth Comply	Prep Area Comply	Total Response	% Prep Area Comply
Baseline	80	148	60.6%	18	69	26.1%
EPA Followup	91	138	65.9%	27	39	69.2%

⚡ BOTH are statistically significant difference, if simple random sample.

Key Indicator — Paint Guns HVLP

	Yes, Have ONLY Compliant Guns	Total Response	% ONLY Compliant Guns
Baseline	90	155	64.3%
EPA Followup	83	123	67.5%

⌘ 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

	Fully Enclosed Gun Cleaning	Total Response	% Fully Enclosed
Baseline	133	155	85.8%
EPA Followup	127	144	88.2%

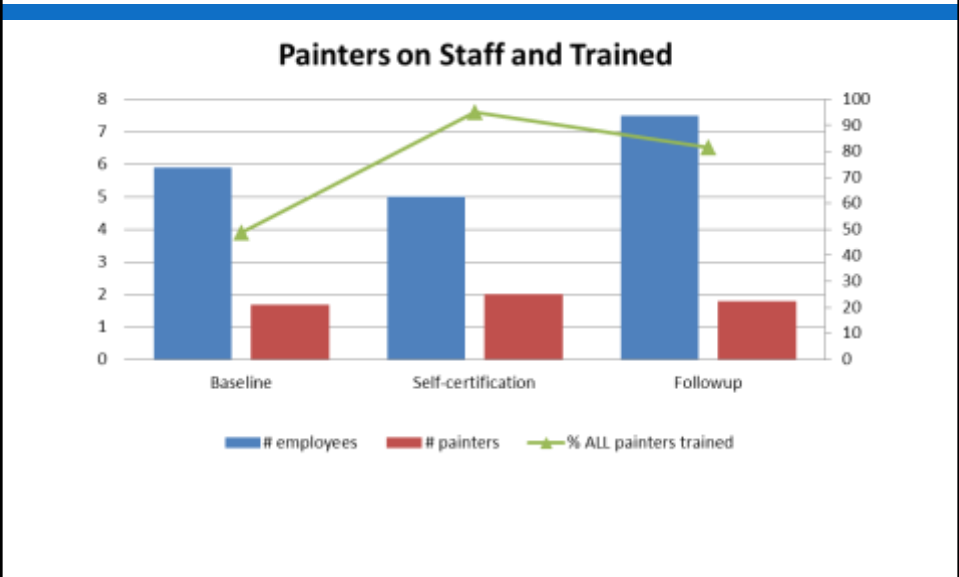
⌘ Not statistically significant difference

Key Indicator – Painter Training

	Painters Trained	Total Response	% Painters Trained		Training Records	Total Response	% Have Records
Baseline	77	155	49.7%		63	142	44.4%
EPA Followup	118	146	80.8%		120	144	83.3%

⚡ BOTH statistically significant difference, if simple random sample.

Shop Staffing



Key Indicator – No MeCl in Paint Strippers

	Use No MeCl in Paint Strippers	Total Response	% Without MeCl
Baseline	4	26	15.4%
EPA Followup	2	20	10.0%

∞ Not statistically significant difference

Key Indicator - Received Information on Rule

	Yes, Received Info	Total Response	% Received Info
Baseline	107	142	75.4%
EPA Followup	128	142	90.1%

∞ Statistically significant difference, if simple random sample.

Key Indicator - Initial Notification

	Yes, Submitted Form	Total Response	% Submit	C o n f i r m	Differed on EPA List	Actual # Submit	Other
Baseline	92	156	59%			30	100
EPA Followup	99	138	71.5%		31	91	7 w/o initial submitted NOCS

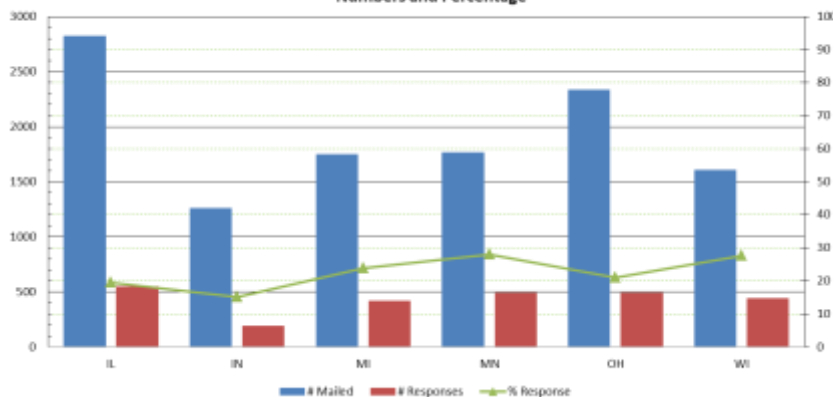
⌘ Statistically significant difference, if simple random sample.

Self-Certification Response

⌘ Total Self-Certifications Mailed: 11549

⌘ Total Self-Certification Responses: 2597 or 22.5%

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:
 - $[\# \text{ observations match preferred response} / \text{total} \# \text{ observations}] * 10$
 - 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	EBPIs
<ul style="list-style-type: none"> ☞ 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 	<ul style="list-style-type: none"> ☞ 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

Facility Score Distribution
Verified Compliance Questions
SB6AP Baseline Inspections

Facility Score	Percent of Facilities
1	1.8%
2	7.2%
3	8.8%
4	18.7%
5	18.7%
6	15.4%
7	11.2%
8	6.8%
9	7.2%
10	7.2%

Facility Score Distribution - Corrected
Verified Compliance Questions
EPA Follow-up Inspections

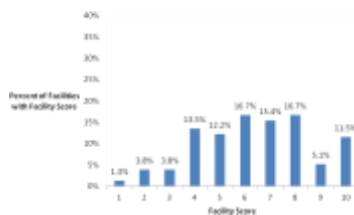
Facility Score	Percent of Facilities
1	0.0%
2	0.0%
3	2.2%
4	2.2%
5	6.0%
6	9.8%
7	11.6%
8	18.3%
9	21.7%
10	27.6%

Difference Between Rounds	Statistically Significant?	Confidence Intervals		
		Lower Bound	Observed	Upper Bound
Average Facility Score*	YES	20.0	24.1	28.2
Median Facility Score	nc	nc	31.8	nc
Aggregate Achievement Rate*	nc	nc	23.4	nc
"Full Achievement" Rate (Achievement Rate across All Measures*)	YES	9.2	15.6	21.9
Percent of Facilities Achieving At Least One Measure	no	-0.8	1.9	4.7

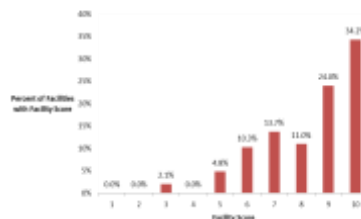
Results Tell the Story — Region Wide

EBPIs

Facility Score Distribution
Verified EBPI Questions
SREAP Baseline Inspections



Facility Score Distribution Corrected
Verified EBPI Questions
ENR Follow-up Inspections



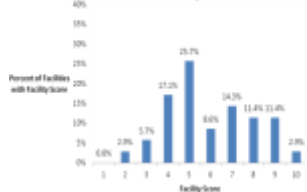
Difference Between Rounds	Statistically Significant?	Confidence Intervals		
		Lower Bound	Observed	Upper Bound
Average Facility Score*	YES	17.1	21.1	25.0
Median Facility Score	nc	nc	24.9	nc
Aggregate Achievement Rate*	nc	nc	20.6	nc
"Full Achievement" Rate (Achievement Rate across All Measures*)	YES	8.5	14.7	20.8
Percent of Facilities Achieving At Least One Measure	no	-1.3	1.3	3.8

Results — State by State

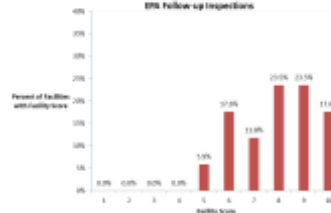
Illinois

- low 6's
- mid 7's
- Δ 1.2

Facility Score Distribution
Illinois
Compliance
SREAP Baseline Inspections



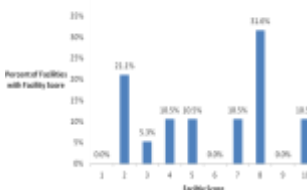
Facility Score Distribution Corrected
Illinois
Compliance
ENR Follow-up Inspections



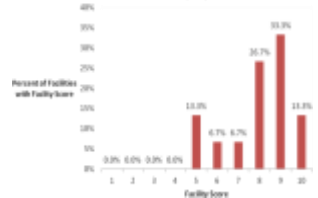
Indiana

- low 6's
- low 7's
- Δ 1.0

Facility Score Distribution
Indiana
Compliance
SREAP Baseline Inspections



Facility Score Distribution
Indiana
Compliance
ENR Follow-up Inspections



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



Results — State by State

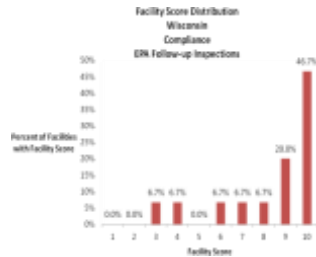
Michigan

- 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
 - MeCI 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

State	Events (#)	Articles - Publication	Online Training Materials	Factsheets/ Postcards
IL	17 (825)	Clean Air Clips: Feb and Oct, 2011	Region 5 ERP Webpage (8223)	3 Factsheets
IN	9 (334)	CTAP Hot Topic: Jan 2010	<ul style="list-style-type: none"> • Collision Repair Assistance website • Region 5 ERP Webpage (8223) 	1 Factsheet and Compliance Manual
MI	32 local, 1 webinar (70)	DNRE Web Article	<ul style="list-style-type: none"> • Checklist Tutorial (328) & Rule Overview Video (381) • Webpage & Region 5 ERP Webpage (8223) 	4 Factsheets
MN	5 (88)	<ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • 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 e-mail 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?

- ✉ Renee Lesjak Bashel
- ✉ WI DNR
- ✉ ERP Grant Specialist
- ✉ ReneeL.Bashel@wisconsin.gov