

A scenic sunset over a body of water with mountains in the background. The sun is low on the horizon, casting a golden glow across the sky and reflecting on the water. The mountains are silhouetted against the bright sky.

Building ERP Support

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Main Topics

- Multistate Approach - Renee
- Industry Strategy - Kevin



Region 5 ERP Partnership

- Regional States/EPA Meeting May 7th
 - In Chicago: EPA regional, OPEI, WI, MN, MI, IN, RI
 - Videoconference: MI, MN, WI
 - Teleconference: OH, EPA HQ and RTP
- Proposed concept: use ERP to measure compliance with area source NESHAP across region
 - Compared sampling scenario of whole region (6 states) vs WI only to show ERP benefit of scale
 - Used population of autobody shops
 - implement portion of NESHAP affecting autobody

Sampling Scenario

- Using 90% confidence interval
- Region-wide sample
 - urban focus doesn't lose confidence/margin of error because of size
 - total about 9000, sample minimum 140 total
 - states take proportional sample, minimum 15 each (maximum ~35)
- Mike Crow created proportional sample planner

Implementation Concept

- State SBEAPs conduct training and baseline site visits (confidential, compliance assistance)
 - use existing resources that would be spent on similar activities for any new rules
 - programs already develop materials, notification forms, provide training, and some do site visits
- EPA staff conduct compliance inspections (post-certification)
- ALL collect same core data on NESHAP

Implementation Concept

- Set up Notification of Compliance Status (NOCS) as “Self-certification”
 - gives mandatory submittal date
 - NOCS often take shape of checklist-like form anyway
- Region 5 EPA designs post-2011 implementation plan based on ERP pilot

Roadblocks - Surmounted

- Will ERP relax requirements in NESHAP?
 - not intention because using ERP as outreach on new standard
 - showed regional counsel examples of ERP checklists including NESHAP requirements (autobody common measures)
- Use of grant funds if ERP does allow relaxation or flexibility from NESHAP?
 - could put EPA in an untenable position
 - not an issue since not planning to relax requirements (unless plain-language translation is a concern)

More Roadblocks - Surmounted

- Will inspectors have necessary training (certification) for enforcement follow-up?
 - EPA official inspectors only on post-cert visits
 - SBEAPs or state inspectors would do baselines as compliance assistance visits ONLY
- Will it be used for state delegation or implemented through MOU?
 - not intended for delegation, but will help with aspects of implementation
 - regional counsel was aware of other rules where agreements on implementation strategy used in place of delegation

Next Steps

- Refine workplan and agree on state and Regional roles (MOU?)
 - not all 6 states are willing to commit yet
 - 4-5 states have, some with caveats
 - Region 5 is urging uncommitted state air programs to participate
- Multi-state proposal for SIG
 - travel for training, costs of publications, and data management
 - possibly include other Regions, states?

Discussion

- Any clarifying questions on our project?
- Other questions – open discussion
- Continue discussion tonight in Sierra board room at hotel: 7-9pm
- Ongoing - contact Renee Bashel or Al Innes

Industry Strategy

- Use Business/Industry Champions to build ERP support with:
 - Biz/Industry Sectors
 - EPA
 - Other Regulatory Programs
 - Law and Policy Makers

Workgroup Activities

- 2007 ERP Consortium/2008 Innovations Symposium
- Draft Strategy Document
- Strategy applied to Auto Body Sector for Discussion
- Survey

Survey Results

- Survey Responses – 14
 - RI, WI, MI, NH, SC, NV, MA, MN, CO, IN, VT, VA, NY, KY
 - Email response from Maine

1. What Associations are strongest supporters of ERP in your state?

- Dry Cleaners – 40%
- Printers – 40%
- Auto Salvage – 30%
- UST/Gas Stations – 30%
- Autobody Collision Repair – 30%
- Ten States Responded

2. Strongest potential for providing national outreach or publicity?

- Printers – 50%
- Autobody/Collision Repair - 40%
- Dry Cleaners – 40%
- Auto Salvage – 30%
- UST/Gas Stations – 30%
- Ten States Responded

A background image of a sunset over a body of water. The sun is low on the horizon, casting a golden glow across the sky and reflecting on the water's surface. The sky transitions from a deep blue at the top to a bright orange near the horizon. The water in the foreground is dark blue with gentle ripples.

3. Would they be willing to participate on a subcommittee call?

- Yes – 57%
- No – 43%
- Fourteen States Responded

4. Prioritize for developing a Champion

- Autobody/Collision Repair – 1.85
- Dry Cleaners – 2.92
- UST/Gas Stations – 2.92
- Printers – 3.54
- Auto Salvage – 3.77
- Ranked 1-5, with 1 being highest
- Thirteen States Responded

Discussion of Survey Results

- What can we make of them?
- How do we build support within our individual states?
- Which states have this support?
- How can business or industry champions support ERPs?
- Should we try to engage Association representatives on a call?
- Next Steps