

Innovative Regional Partnership for Rule Implementation and Measuring Compliance

The Region 5 Autobody Environmental Results Program

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ERP Consortium Webinar
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Do your state's small sources comply with environmental rules?

- SBA tells us small businesses make up 90+% of number of businesses
 - Most states don't inspect minor air pollution sources or conditionally exempt SQG
- **How do you increase the number of emissions sources you inspect without more staff?**

SBEAPs asked similar question

- **Question: How to reach 12,000 autobody shops in Region 5 to ensure compliance w/area source NESHAP?**
 - Only had Small Business Environmental Assistance Programs (SBEAPs; avg 2-3 staff per state) 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)

Another multi-state ERP

- **Common Measures Project**
 - <http://www.newmoa.org/erp/projects/commeas.cfm>
 - Massachusetts, Colorado, Connecticut, Maine, New Hampshire, New York, Rhode Island, and Vermont as "participating" states
 - Washington and California as "observer" states
 - selected Small Quantity Generators (SQGs) of hazardous waste
- **Results of interest to Region 5 SBEAPs:**
 - onsite compliance and "beyond compliance" assistance programs appear to be associated with higher performance levels on both types of indicators
 - frequency of inspections and enforcement actions (the traditional compliance approach) did not appear to affect performance levels

Partnership Among Six States & EPA

- Phases:
 - SBEAPs conduct baseline site visits, random sample
 - Used ERP self-certification to satisfy 6H notification requirements
 - did ask HW and WW questions in baseline
 - Region 5 EPA staff conduct follow-up inspections, random sample
 - WI conducted statistical analysis and complete report

Distributing the Work

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	33	15	25	19	38	15	145
Difference from target	-1	0	0	0	0	0	-1

WI hosts multistate web page: dnr.wi.gov/topic/CompAssist/sb/Autobody.html



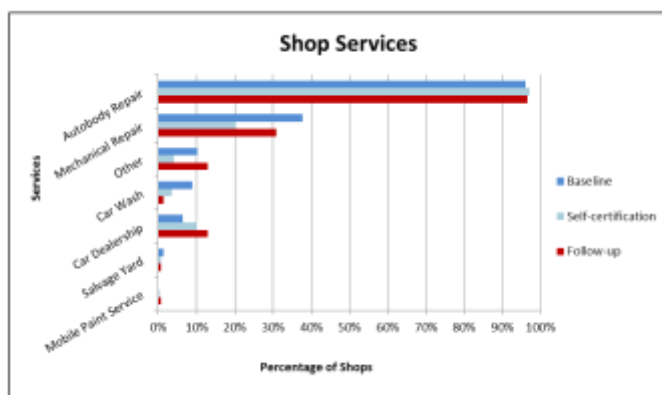
Compliance Assistance Effort

State	Events	Articles - Publication	Online Training Materials	Factsheets/ Postcards
Illinois	17 (825)	Clean Air Clips: Feb and Oct, 2011	Region 5 ERP Webpage	3 Factsheets
Indiana	9 (334)		Region 5 ERP Webpage	
Michigan	32 local, 1 webinar (70)	DNRE Web Article	<ul style="list-style-type: none"> Checklist Tutorial & Rule Overview Video Webpage & Region 5 ERP Webpage 	4 Factsheets
Minnesota	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	4 Factsheets Initial & Reminder Postcards
Ohio	31 (1030)	OCAPP Newsletter: Winter 08, Summer 09, Fall10	Webpage & Region 5 ERP Webpage	2 Email Reminders 1 Reminder Postcard
Wisconsin	13 (465)	<ul style="list-style-type: none"> The Autobody Journal, June/July 2008 WACTAL Newsletter, 2010 	Region 5 ERP Webpage	3 Factsheets 1 Reminder Postcard

State Differences

- State VOC RACT Rules Present for Some
 - IN, MI, OH, WI all had VOC RACT Rules in many urban counties
 - For IL we removed Chicago/Cook County b/c VOC RACT and County Ordinances more stringent than rest
 - Mainly HVLP guns, VOC content limits, some also include use of “enclosure”

Region 5 Shop Characteristics



Shop Staffing



Key Indicator - All Spraying in Booths

	No Evidence of Spraying Outside Booth	Total Response	% All Spraying in Booth
Baseline	114	148	77%
EPA Followup	133	142	93.7%

- Statistically significant difference, if simple random sample

Key Indicator - Paint 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	90	137	65.7%	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	82	122	67.2%

- NOTE: We counted ANY non-compliant gun against them. Most states already had HVLP regs in urban counties.
- Not statistically significant difference

Key Indicator - Painter Training

	Yes, All Painters Trained	Total Response	% Have All Painters Trained
Baseline	77	155	49.7%
EPA Followup	118	145	81.4%

- Statistically significant difference, if simple random sample

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

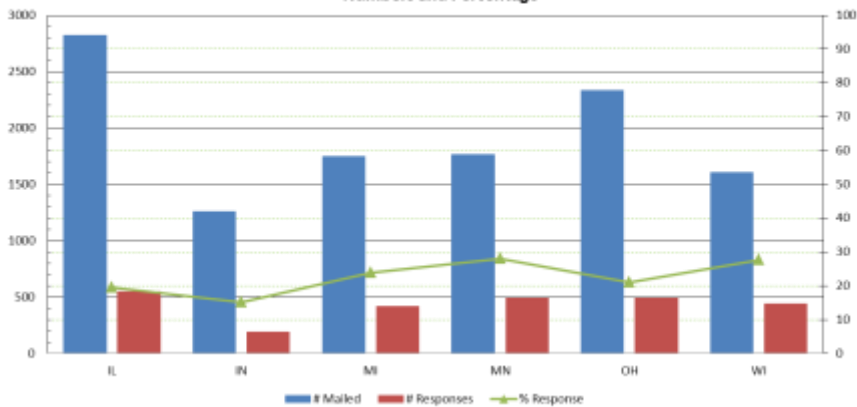
	Yes, Received Info	Total Response	% Received Info
Baseline	107	142	75.4%
EPA Followup	127	143	88.8%

- 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



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	98	137	71.5%		31	91	7 w/o initial submitted NOCS

- Statistically significant difference, if simple random sample.

Results Tell the Story - Region Wide

■ Compliance

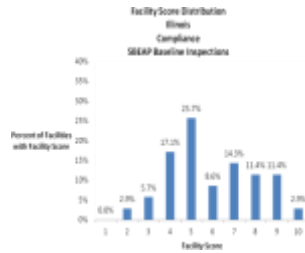


■ EBPIs



Results - State by State

- Illinois



- Indiana



Results - State by State

- Ohio



- Minnesota

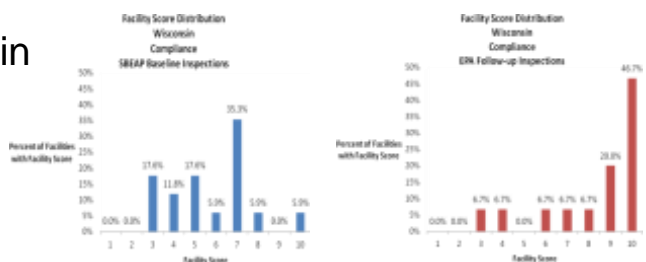


Results - State by State

■ Michigan



■ Wisconsin



Observations on Results

- Key Indicators ALL Show High Rates of Improvement
 - MeCl use very low anyway, so small improvement has little impact on emissions
- 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
- Stronger Trends With More Compliance Assistance Relative to Population?

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

ERP States-EPA Meeting

- June 19-20 in Wash D.C.
 - <http://www.newmoa.org/events/event.cfm?m=73>
 - Travel Support available
 - **Apply by April 26!**
 - Hotel Room
 - Reservations by May 17



Questions?

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