

Region 5 States Environmental Results Program for Autobody Refinishing Shops



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PROJECT SUMMARY

Applicant: Wisconsin DNR, SBCAAP

Project Cost: \$350,000

Project Period: 10/1/09 – 9/30/12

State Agency Support: SBEAPs in
Michigan, Minnesota, Illinois, Indiana,
and Ohio

Partner: NEWMOA



Small Business Environmental Assistance Programs (SBEAPS)

- Section 507 of Clean Air Act
- 16 years of compliance assistance experience.
- Many SBEAPs provide outreach on all environmental regulations.
- Michigan, Wisconsin, Minnesota, and Indiana have ERP experience.



Region 5 Autobody ERP

- Focus on NESHAP Subpart 6H
- Hit on other Environmental Regulations
- Energy Efficiency
- Pollution Prevention



Overview of Subpart 6H

- Spray paint in enclosure
- 98% filter efficiency
- HVLP spray guns
- Gun cleaning without atomizing
- Painter certification
- Notifications: Initial and Compliance Status



Spray Painting in Enclosure



Painter Certification



ERP Steps and Deadlines

Step 1: Inventory (Completed)

Step 2: Baseline visits (Jan-May 2010)

Step 3: Compliance Assistance (Summer 2010)

Step 4: Self Certification (Fall 2010)

Step 5: Targeted Follow-up (Winter 2011)

Step 6: Post-Certification Inspections (Summer 2011)

Step 7: Informed decision making (Fall - Winter 2012)



Step 1: Inventory

- Urban Counties Areas of Focus
 - Population > 200,000
 - Best use of time and travel
 - Biggest gains on public health
 - Improve air quality in environmental justice areas

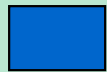


Step 1: Inventory

Economies of Scale With Statistics



Sampled Facilities



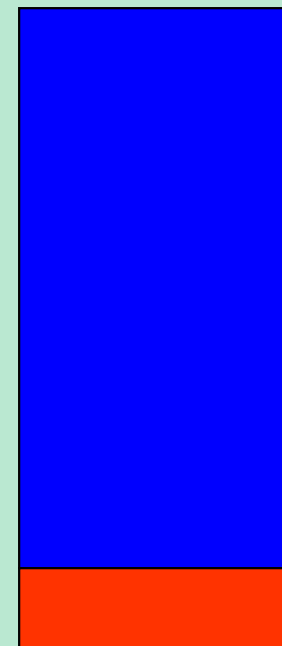
All other Facilities in Sector



200 Facilities
50 Inspections



2,000 Facilities
64 Inspections



20,000 Facilities
66 Inspections



Note: Figures based upon 95% confidence level

Step 1: Inventory

	WI	MN	MI	IN	IL	OH	Region
Total Urban Population	456	675	877	489	1,225	1,347	5,069
Sample (Individual States)	62	78	102	62	140	156	600
Sample (Region)	15	19	25	15	34	38	146



Step 2: Baseline Visits

- Training at Region 5 in Fall 2009 for the project field staff for common understanding of measures.
- Onsite survey questions.
- Call before visiting.



Step 2: Baseline Visits

Early Findings -

- Large disparity in housekeeping, number of employees, sales, interest in the regulations, and resources to comply.
- Don't like keeping records.
- Licensed shops located in residential neighborhoods.



Step 2: Baseline Visits

Early Findings -

- Shops need one place to go for correct answers.
- Very few get inspected by state.
- Regulate the sale of paint.
- Level the playing field.
- Industry's perception: EPA will be going after shops with the money (large dealerships).



Step 2: Baseline Visits

Uncovering the sticky compliance issues. Examples:

- Downdraft preparation stations
- Painting on a frame rack
- Loop holes: 3 ounce cup
- OSHA and Local Codes



Step 3: Compliance Assistance

- Regional Collaboration
 - Providing same interpretations among states and EPA enforcement.
 - Don't reinvent the wheel.
 - Monthly Tool Development Conference Calls.
 - Post on Wisconsin Dept of Commerce Web site.
 - http://commerce.wi.gov/bd/BD-CA-AutobodyERP_training.html



Step 3: Compliance Assistance

- Frequently Asked Question Document
- Shared nation-wide via Small Business Environmental Home Page (www.smallbiz-enviroweb.org)
- OECA review



Step 3: Compliance Assistance

- Compliance assistance starting before completion of baseline inspection
- DNRE has attended 12 painter certification trainings
- Over 1,000 Michigan painters certified



Step 3: Compliance Assistance

- Threat of enforcement = Standing Room Only



Step 3: Compliance Assistance

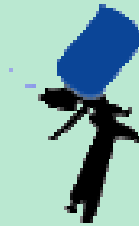
- Early Findings:
 - Keep it simple
 - Right tool for different audiences:
 - Videos and FAQs for the shops
 - Detailed fact sheets for jobbers
 - Associations
 - Distributors’/Manufacturers’ Reps
 - Local building inspectors and MIOSHA



Trade Association



Distributors/Jobbers



Manufacturer Reps



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