

US EPA ARCHIVE DOCUMENT

Washington State Department of Ecology
Sustainable Washington Project

State Innovations Grant Progress Report

This progress report covers the period from July 1, 2008 through September 30, 2008.

Part 1 – Synopsis of Accomplishments During the Reporting Period

During the reporting period, Ken Zarker, Pollution Prevention and Regulatory Assistance Section Manager, and Alison Chamberlin, Grant Project Coordinator, forwarded final QAPP edits for consideration to Jack Boller, USEPA's Project Manager.

Overall, the project is on schedule with a few minor modifications that will not impact the deliverables or major project milestones. The project will engage 789 auto body shops with 189 baseline site visits beginning in November 2008.

Ecology is pleased to include a revised final statistical methodology that was developed in partnership with EPA, the states consortium and Michael Crow.

During this period, Ecology has conducted stakeholder outreach, held an ERP training workshop, completed the ERP Auto Body Checklist, final technical assistance manual, produced the auto body "universe" data base, and the site visit protocols. .

Ecology also conducted significant stakeholder outreach and coordination with to ensure a smooth launch of the initial site visits beginning in November 2008.

This collaborative effort included both internal and external stakeholder development with our Air, Water, Hazardous Waste, and Solid Waste Programs; the EnviroStars Coop members; WA Department of Labor and Industries; Local Source Control Partnership and key auto body association stakeholders in Washington.

Two industry stakeholder meetings were held with industry members to assist in the development of the checklist and technical manual. Ecology staff reviewed and drafted the return-to-compliance process in July and August as well.

A significant milestone was the ERP training workshop held on September 24, 2008 attracting over 50 attendees, including the local source control specialist and representatives from the auto body industry.

Another key aspect is the inclusion of the EPA Area Source rule requirements for surface coaters into the ERP checklist. Ecology is working with EPA Region 10 to make sure this satisfies the compliance requirements.

During the reporting period the draft Auto Body ERP Inspector's checklist was enhanced to:

- 1) Coordinate with the Local Source Control Program database and checklist.
- 2) Incorporate self-certification indicators to satisfy EPA's Area Source rule.
- 3) Include WA State Department of Labor and Industries regulations.
- 4) Ecology also re-evaluated the statistical methodology planned for random site visits and revised the methodology and corresponding lists of facilities.

Ecology is on track to complete technical assistance workshops, outreach, and self-certification by March, 2009. Additional follow-up technical and Return-to-Compliance assistance by June, 2009 and verification site visits by the end of September 2009.

The program evaluation will begin in October 2009, including the identification of future sectors and potential expansion of statewide EnviroStars program.

With regard to scheduled tasks, Ecology has accomplished the following during the three months covered by this report:

Task 1.1 – Environmental Results Program Pilot Team: Below is what we accomplished for this task during the reporting period.

Commitment	Accomplishment
Review and update ERP materials	ERP materials (primarily the checklist of indicators and technical assistance workbook) continued to be reviewed and updated by the ERP team. Drafts were completed by July 31, 2008. Vetting with stakeholders and Ecology managers was completed in August, 2008.
Establish data base needs and number/names of potential facilities	Database needs are still being identified and strategies developed, in consideration of the new ERP tool recently developed by Massachusetts. The new tool has not been available for our review, though is expected to be available in late November/early December 2008.
Conduct outreach with regional offices and Local Control Specialists	Grant Project Coordinator and ERP Team staff participate in weekly meetings with Local Control Specialists and Local Source Control Managers from regional offices to provide project updates and obtain feedback.

Identify sector incentives	Ecology continues to work toward incorporating a self-certification incentive for shops to satisfy EPA Area Source Rule NOC requirements in conjunction with completion of the self-certification process. Ecology is also exploring a possible reimbursement of its \$46 Hazardous Waste Education Fee for new self-certification EnviroStars applicants. Ecology is still exploring a voucher program with King and Kitsap Counties to allow a voucher option for EnviroStar applicants as well. Ecology was not able to complete an incentive agreement with I-CAR on a HAP training fee-reduction incentive for EnviroStar applicants.
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Task 1.2 – Trade Association Meetings: Completed. Additional stakeholder meetings were conducted to accommodate the ERP and EnviroStars merger concept, and the hiring of new local source control specialists. These accomplishments are:

Commitment	Accomplishment
Conduct meetings with trade associations	In addition to stakeholder meetings held early in the pilot process, had additional meetings with key trade association stakeholders. In August Ecology held stakeholder meetings in both North and South Puget Sound and obtained project and materials review and feedback. These meetings established a basis for partnership activities and technical assistance for the pilot. An additional pilot update meeting is being planned for stakeholders in Spokane County.

Task 1.3 – Facility Universe: Completed. In response to checklist enhancements and revisions to our statistical methodology, the pilot task outline and timeline for this task were slightly modified during this reporting period.

Commitment	Accomplishment		
Identify ERP facility universe	The auto body facility universe (number and names of facilities in target area) was again modified to correct proportionality issues with our small stratified random samples—issues identified by Mike Crow, EPA Environmental Consultant. Our new methodology addresses the issues and will be reflected in the final QAPP. New facilities lists will be generated and provided to inspectors in October.		
	County / Jurisdiction	# of Auto Body Shops	Total # of Site Visits
	City Of Bellevue	23	6
	King County	241	47
	Kitsap County	77	15
	San Juan County	4	4
	Skagit County	32	8
	Snohomish County	128	25
	Spokane County	99	20
	Pierce County	124	25
	City of Bellingham	13	13
	Issaquah	9	9
	Whatcom County	30	8
	Mason County (to be performed by Kitsap Co if they are going to do Mason Co)	9	9
	Totals = 12 Counties	Total = 789 Auto Body Shops	Total = 189 Site Visits

Task 1.4 – Staff Training: Completed.

Commitment	Accomplishment
Conduct ERP staff field training	Training to approximately 50 attendees was conducted on September 28, 2008.

Part 2 – Narrative Discussion

Task 1.1 – ERP Pilot Team: A new task and project timeline for these outputs was developed in response to coordination requirements between the ERP pilot and Ecology’s Local Source Control Program. In response to checklist enhancements and revisions to our statistical methodology, the pilot task outline and timeline for this task were slightly modified during this reporting period.

Output/Performance Measure	Accomplishment
Final work plan for team	Ongoing. Finalization of the Inspector’s Checklist and final document review/Plain Talking was moved to October. Printing of the technical assistance manual was moved to November. Baseline inspections remained on track to commence in October, as scheduled and planned for in the Progress Report for the 2 nd Quarter. Technical assistance, verification inspections, and analysis/evaluation/reporting are on track as noted in the Progress Report for the 2 nd Quarter.
Final guidance materials, including workbooks, checklists, certification forms	Mostly completed. Draft inspector’s checklist and workbook were completed by in August, 2008. The Inspector’s Checklist was completed in October and final edits and printing are scheduled for November, 2008. Other documents (final Self-Certification Checklist and Return-to-Compliance Plan, etc.) have been re-scheduled to be finished during the fourth quarter.
Incentives implemented for ERP phase of program	Ongoing. Ecology continues to work toward incorporating a self-certification incentive for shops to satisfy EPA Area Source Rule NOC requirements in conjunction with completion of the self-certification process. Ecology is also exploring a possible reimbursement of its \$46 Hazardous Waste Education Fee for new self-certification EnviroStars applicants. Ecology is still exploring a voucher program with King and Kitsap Counties to allow a voucher option for EnviroStar applicants as well. Ecology was not able to complete an incentive agreement with I-CAR on a HAP training fee-reduction incentive for EnviroStar applicants.

Task 1.2 – Trade Association Meetings: Additional focus group meetings were held with industry members. They also participated in the ERP workshop in September 2008.

Output/Performance Measure	Accomplishment
Conduct at least two ERP meetings with trade associations	Completed. In addition to stakeholder meetings held early in the pilot process, had additional meetings with key trade association stakeholders. In August Ecology held stakeholder meetings in both North and South Puget Sound and obtained project and materials review and feedback. These meetings established a basis for partnership activities and technical assistance for the pilot. An additional pilot update meeting is being planned for stakeholders in Spokane County.

Task 1.3 – Facility Universe: In response to checklist enhancements and revisions to our statistical methodology, the pilot task outline and timeline for this task were slightly modified during this reporting period.

Output/Performance Measure	Accomplishment
Identify ERP facility universe, including number of businesses in universe and number of initial inspections required for statistically valid sample	Completed. The auto body facility universe (number and names of facilities in target area) was again modified to correct proportionality issues with our small stratified random samples—issues identified by Mike Crow, EPA Environmental Consultant. Our new methodology addresses the issues and will be reflected in the final QAPP. New facilities lists were generated and provided to inspectors in October.

Task 1.4 – Staff Training: Ecology completed this task according to the new timeline established during the 2nd quarter.

Output/Performance Measure	Accomplishment
Conduct ERP staff field training for 10 new staff and 30 existing field staff	Completed. Training was completed as scheduled in September, 2008.

Part 3 – Projection of Activities, Accomplishments, and Major Expenditures for Next Quarter Report

Ecology expects to accomplish the following tasks by December 2008:

- Conduct baseline inspections, in accordance with established protocols.
- Finalize technical assistance materials and workbook
- Establish and test ERP database, continuing into 1st quarter of 2009

During the first quarter of 2009 (January-March 2009), Ecology expects to accomplish the following tasks:

- Distribute technical assistance materials and conduct technical assistance outreach
- Establish and test ERP database

Part 4 – Financial Report

Attached is our Innovative Grant budget status report for the reporting period.