

US EPA ARCHIVE DOCUMENT

Quarterly Report to USEPA  
January 1, 2011 - March 31, 2011

State Innovation Grant - Region 5 States Environmental Results Program  
for Autobody Refinishing Shops  
Cooperative Agreement No. EI -00E93701-0

Submitted by:  
Renee Bashel  
Wisconsin Department of Commerce  
Small Business Clean Air Assistance Program  
PO Box 7970, Madison, WI 53707-7970  
Phone: 608.264.6153 Fax: 608.264.6151  
Email: [Renee.Bashel@wisconsin.gov](mailto:Renee.Bashel@wisconsin.gov)

The objective of the Region 5 States ERP for Autobody Refinishing Shops project is to use the ERP structure to implement a portion of subpart 6H affecting autobody refinishing shops and in doing so, determine the impact of direct compliance assistance, self-assessment and certification, and random-sample site visits or inspections in lieu of traditional permitting and enforcement inspections. The Wisconsin Department of Natural Resources (WDNR) and Department of Commerce Small Business Clean Air Assistance Program (SBCAAP) will partner with Region 5 state Small Business Environmental Assistance Programs (SBEAPs), other assistance staff and EPA Region 5 Air Program staff to develop an ERP for the autobody refinishing sector affected by the subpart 6H area source NESHAP, which will include compliance assistance, self-certification, and statistical analysis of baseline and post-certification measurement of performance.

Included in this quarterly report is a summary of the progress achieved to date on milestones identified in the July 31, 2009 final project narrative and work plan.

**Project/Program Assessment:**

The project is largely still on track to meet the key milestones in the project workplan after two quarters of work. Key outreach materials cannot be developed without an initial assessment of gaps in understanding. Once we complete the baseline visits, we can draw some initial conclusions about areas that need a greater focus in the outreach materials.

**Project Schedule:**

Changes to milestone dates are identified in the following table in **blue text**. Completed milestones are highlighted in **yellow**.

Quarter	Projected Milestones
1. Fall 2009 (Oct-Dec)	<ul style="list-style-type: none"> <li>1. Develop and submit QAPP</li> <li>2. Identify universe of facilities</li> <li>3. Select contractor for IL baseline visits</li> <li>4. Complete MOU between WI Dept of Commerce and other state SBEAPs and NEWMOA</li> <li>5. Develop site visit checklist, protocol and training, data management process</li> <li>6. Conduct site visit training</li> <li>7. Begin baseline site visits</li> </ul>
2. Winter 2010 (Jan-Mar)	<ul style="list-style-type: none"> <li>8. Quarterly Report</li> <li>9. Finish baseline site visits</li> <li>10. Data management and analysis for baseline (July 2010 - May 2011)</li> <li>11. In partnership with associations, develop outreach materials to publicize the project</li> </ul>
3. Spring 2010 (Apr-Jun)	<ul style="list-style-type: none"> <li>12. Quarterly Report</li> <li>13. Mail self-certification and workbook to urban universe</li> <li>14. Respond to requests for assistance on phone or site (Nov 2010-Mar 2011)</li> </ul>
4. Summer 2010 (Jul-Sep)	<ul style="list-style-type: none"> <li>15. Quarterly Report</li> <li>16. Conduct workshops and other education (Nov - Dec 2010)</li> </ul>
Federal fiscal year 2011	
5. Fall 2010 (Oct-Dec)	<ul style="list-style-type: none"> <li>17. Quarterly Report</li> <li>18. Help EPA develop post-certification inspection and data management protocol (Nov 2010 - Mar 2011)</li> </ul>
6. Winter 2011 (Jan-Mar)	<ul style="list-style-type: none"> <li>19. Quarterly Report</li> <li>20. Finish development of post-certification inspection protocol and data routines; Begin processing cert data (certs due: MAR. 11, 2011: Compliance notification/date) (Apr 2011 - Aug 2011)</li> </ul>
7. Spring 2011 (Apr-Jun)	<ul style="list-style-type: none"> <li>21. Quarterly Report</li> <li>22. Final cert data processing; Begin post-cert inspections; design transition to Region 5</li> </ul>
8. Summer 2011 (Jul-Sept)	<ul style="list-style-type: none"> <li>23. Quarterly Report</li> <li>24. Finish post-cert inspections</li> </ul>
Federal Fiscal Year 2012	
9. Fall 2011- Winter 2012 (Oct-Mar)	<ul style="list-style-type: none"> <li>25. Quarterly Report</li> <li>26. Finalize post-cert data and analysis</li> <li>27. Create vehicle for annual (or other periodic) submittals and data management between state/fed</li> </ul>
10. Spring - Summer 2012 (Apr - Sept)	<ul style="list-style-type: none"> <li>28. Finalize project report.</li> </ul>

**Work accomplished this quarter:**

Develop site visit checklist, protocol and training, data management process - Complete. All data entry was completed this quarter.

Finish baseline site visits - Complete. All site visits were completed.

Data management and analysis for baseline - In progress. We continue to work out bugs in the ERP Performance Analyzer as well as have begun conducting the data quality checks required by the QAPP.

In partnership with associations, develop outreach materials to publicize the project - Complete. All materials were developed and posted on line. Each state program has been working with associations, suppliers or other contacts to provide training and materials to shops. States sent emails or letters to contacts to notify them prior to or around the time we mailed the self-certification materials.

Mail self-certification and workbook to urban universe - Complete. In early November all self-certification checklists were mailed to shops - in fact they were sent to all shops in all states, not just urban areas. The "workbook" refers to compliance assistance materials, which in many ERPs are provided through a detailed document. To save costs and simplify the materials, they were all provided online through a common web page ([bit.ly/autobodyproject](http://bit.ly/autobodyproject)) maintained by WI Department of Commerce.

Respond to requests for assistance on phone or site - Complete. Calls tapered off about one week after the March 11 deadline. A few additional checklists and forms were trickling in at the end of the month.

Conduct workshops and other education - Complete. Each state managed workshops in different ways, as best served their shops needs. An online tutorial is provided via the website to help shops complete their forms. This makes training available 24/7 to shops that may be busy during the day.

Of the two webinars created for training shops, the counts are:

- 6H overview: 244 views from 8/4/10 through 3/17/11
- 6H Self Certification Checklist training: 247 views from 10/27/10 through 3/17/11

Help EPA develop post-certification inspection - In progress. The state innovation grant ICR was out for public comment on its renewal, and comments were provided to clarify the process of EPA follow up inspections to complete the project.

In January, EPA inspectors were provided with their randomized inspection lists so that they could prepare for travel in late spring, early summer. A discussion between project co-lead Bashel and the EPA inspectors occurred in February to establish the final inspection checklist questions. EPA Region 5 determined they would be unable to ask questions beyond the area source NESHAP, so the post-certification inspections will not be multimedia. A project change request from the EPA grant manager was indicated by the inspectors during that discussion, but nothing has been received by Bashel yet.

#### Work projected for next quarter:

The bugs in the Performance Analyzer are still under review. Other issues have come up for the Dept of Commerce SBCAAP staff that has delayed our part of that work effort.

Self-certification form submittals came in quantities that were better than expected. Over 2000 hard copies were received and nearly 500 were completed online. Data entry for these is on hold until temporary staff can be hired to do the work.

Project Funding Expenditures:

Line Item Category	Grant Budget	Expenditures (10/01/09-03/31/11)	Match* (10/01/09-03/31/11)	Total (10/01/09-03/31/11)
Personnel	\$1,613.00	\$621.50	\$	\$621.50
Fringe Benefits	\$782.00	\$284.09	\$	\$284.09
Travel	\$0.00	\$0.00	\$	\$0.00
Equipment	\$0.00	\$0.00	\$	\$0.00
Supplies	\$0.00	\$0.00	\$	\$0.00
Contractual	\$398,125.00	\$119,120.50	\$53,834.42	\$172,954.92
Construction	\$0.00	\$0.00	\$	\$0.00
Other	\$0.00	\$0.00	\$	\$0.00
Total Direct Charges	\$400,520.00	\$120,026.09	\$	\$173,860.51
Indirect Charges	\$327.00	\$126.73	\$	\$126.73
Total	\$400,847.00	\$120,152.82	\$	\$173,987.24

\* Expected match amount was surpassed as of Jan, 2011.

Changes to object class categories: None

Changes in principal project manager or other staff assignments: None

Change in project period: None