

US EPA ARCHIVE DOCUMENT

Quarterly Report to USEPA
October 1, 2010 - December 31, 2010

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

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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)	1. Develop and submit QAPP 2. Identify universe of facilities 3. Select contractor for IL baseline visits 4. Complete MOU between WI Dept of Commerce and other state SBEAPs and NEWMOA 5. Develop site visit checklist, protocol and training, data management process 6. Conduct site visit training 7. Begin baseline site visits
2. Winter 2010 (Jan-Mar)	8. Quarterly Report 9. Finish baseline site visits 10. Data management and analysis for baseline (July 2010 - Mar 2011) 11. In partnership with associations, develop outreach materials to publicize the project
3. Spring 2010 (Apr-Jun)	12. Quarterly Report 13. Mail self-certification and workbook to urban universe 14. Respond to requests for assistance on phone or site (Nov 2010-Mar 2011)
4. Summer 2010 (Jul-Sep)	15. Quarterly Report 16. Conduct workshops and other education (Nov - Dec 2010)
Federal fiscal year 2011	
5. Fall 2010 (Oct-Dec)	17. Quarterly Report 18. Help EPA develop post-certification inspection and data management protocol (Nov 2010 - Mar 2011)
6. Winter 2011 (Jan-Mar)	19. Quarterly Report 20. Finish development of post-certification inspection protocol and data routines; Begin processing cert data (certs due: MAR. 11, 2011: Compliance notification/date)
7. Spring 2011 (Apr-Jun)	21. Quarterly Report 22. Final cert data processing; Begin post-cert inspections; design transition to Region 5
8. Summer 2011 (Jul-Sept)	23. Quarterly Report 24. Finish post-cert inspections
Federal Fiscal Year 2012	
9. Fall 2011- Winter 2012 (Oct-Mar)	25. Quarterly Report 26. Finalize post-cert data and analysis 27. Create vehicle for annual (or other periodic) submittals and data management between state/fed
10. Spring - Summer 2012 (Apr - Sept)	28. Finalize project report.

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) maintained by WI Department of Commerce.

Respond to requests for assistance on phone or site - On going. All states are getting calls. Since the final deadline for the compliance notification is not until March, this is expected to continue through the next one or two quarters.

Conduct workshops and other education - Complete, but may continue as requested. 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. Most expect training needs to taper off by early January, but most will likely respond to any requests in the future as well.

Help EPA develop post-certification inspection - Begun. We held training in November to go through an inspection checklist for EPA's use. Discussion of the type and number of questions the EPA staff can ask has yet to be completed. There may be ICR issues with asking so many questions, and going beyond air when they are air staff doing the inspections.

Work projected for next quarter:

The bugs in the Performance Analyzer should be worked out in the next quarter so that it can be ready for self-certification analysis phase.

Self-certification forms have been coming in, so data entry may begin in the next quarter, although some has begun with shops entering responses online. Nearly 200 were submitted online by the end of Dec 2010. Hard copies were coming in slow and steady through the last couple weeks of December as well.

SBCAAP and EPA will coordinate a final inspection checklist and SBCAAP will provide EPA with their randomized urban lists in this quarter.

Project Funding Expenditures:

Line Item Category	Grant Budget	Expenditures* (10/01/09-12/31/10)	Match (10/01/09-12/31/10)	Total* (10/01/09-09/30/12)
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	\$106,284.48	\$48,098.58	\$154,383.06
Construction	\$0.00	\$0.00	\$	\$0.00
Other	\$0.00	\$0.00	\$	\$0.00
Total Direct Charges	\$400,520.00	\$107,190.07	\$	\$155,288.65
Indirect Charges	\$327.00	\$126.73	\$	\$126.73
Total	\$400,847.00	\$107,316.80	\$	\$155,415.38

Changes to object class categories: None

Changes in principal project manager or other staff assignments: None

Change in project period: None