

US EPA ARCHIVE DOCUMENT

**Project Summary Information Page
Applicant Information**

Project Title: Auto Body Certification Project in the State of Delaware

Agency: State of Delaware Department of Natural Resources and Environmental Control

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Project Summary

The Delaware Department of Natural Resources and Environmental Control's Air Quality Management (AQM) section has adopted new requirements for auto body shops. These facilities are required to obtain permits. AQM is in the process of developing a source category permit. We are going to approach the development of the source category permit in a customer friendly way changing the culture of the permitting process for the body shop from an overly burdensome, disruptive or punitive regulatory process to one that is less burdensome and user friendly. The self-certification project will help develop tools we can use to ensure compliance with the permits and provide follow-up assistance and easy access to updates and information for the auto body sector. The self-certification would be a more customer friendly tool for the auto body sector which mainly consists of small businesses that do not have the resources to devote to understanding environmental regulations. We would also use a multi-media approach when educating the auto body sector to ensure compliance with all applicable environmental requirements.

This project is not being executed in cooperation with or funded by another federal program.

Initial assessments of auto body shops will be conducted to determine a baseline compliance rate in the auto body sector. During the compliance assessments and site visits to provide compliance assistance, violations discovered will be considered under the DNREC Penalty Mitigation Policy (as revised, June 7, 2000).

This project has the full support of the Cabinet Secretary of the Delaware Department of Natural Resources and Environmental Control.

Summary of Budget Information

Dollar amount requested from EPA: \$116,500

Dollar amount of voluntary leverage funding offered by the State: \$10,376

Total Project Budget: \$126,876

Project Narrative

The auto body industry in Delaware is subject to federal and state environmental regulations pertaining to air, water pollution, solid and hazardous waste generation. The Delaware Department of Natural Resources and Environmental Control (DNREC) recognizes this sector as a sector that is traditionally not aware of their environmental obligations. The Air Quality Management (AQM) section recognizes that there is a need to work with the auto body industry because so many of the shops may be operating illegally and/or without a permit. The AQM section is developing a source category permit for the auto body sector at this time. A self-certification program with a strong outreach and education component will enhance the regulatory programs within DNREC and move the auto body industry closer to our goal of one hundred percent compliance. The self-certification program will include a multi-media approach addressing all of the environmental regulations pertaining to the auto body sector, and will encourage a beyond compliance type approach including pollution prevention and community involvement. The auto body industry consists of mainly small and medium size shops that operate with minimal resources. The self-certification tools that will be made available to the auto body industry will address the full range of requirements that these shops are responsible for and will allow the shops to understand applicable requirements more easily. The project will educate the auto body sector helping to bring them into compliance. This could in turn reduce air and water pollution and in turn reduce the potential for enforcement actions and fines. This may also help to reduce expenses to the business.

The auto body self-certification project will use Department resources and outside partner leverage to assist with the project. DNREC will take a multi-media approach i.e. water, waste, and air within the organization and we plan to partner with local trade associations, community organizations, Chambers of Commerce, Delaware Economic Development Office, Division of Revenue and would like to pursue contracting with the PennStar program developed in the Commonwealth of Pennsylvania. We will also explore working with local vocational schools to demonstrate techniques and train students who in the future are potential auto body shop employees/owners.

We intend to hire a contractor to prepare fact sheets, self-assessment check lists, a work book for guidance on how to complete the self-assessment check lists, and compliance assistance tools for the auto body shops on pollution prevention, solid and hazardous waste generation, air pollution, and water pollution. We will also provide training through site assessments, workshops, and other training programs such as the PennStar program. The PennStar Program is a mobile van with auto body equipment that would demonstrate techniques that are most efficient in applying paints with spray guns.

This project will use concepts from the Massachusetts Environmental Results Project and the Rhode Island Auto body Certification Program. We will also gather information from other states who have similar projects underway such as Maryland's Park Heights Project and Washington D.C.'s EE-Cars project. We will continue to network with states that have similar projects in place so that we can learn from their projects.

A self-assessment checklist and workbook will be provided to the auto body shops which they in turn will complete and submit to DNREC. This will ease the transition from an unregulated and predominately uneducated sector to a sector which is educated and regulated making the transition as easy as possible for all parties involved. The goals are to gain one hundred percent compliance in an industry that is traditionally not aware of the environmental regulations and to increase regulatory awareness.

The Delaware program intends to expand on the other states' programs to include a community involvement component. Many of the auto body shops are located in communities which face multiple stresses including economical, environmental and social issues. We may need to address shops that are operating as illegal chop shops as well as shops that do not have their community's support. By improving the shops environmental performance we may be able to improve it's relationship with the community as well as the shops relationship with DNREC and other regulatory agencies.

We will also explore incentives to offer auto body shops to encourage participation in this program. Incentives will include the Penalty Mitigation Policy. It has been our agency's experience that some businesses are

afraid to ask for compliance assistance or turn down the opportunity for compliance assistance because they fear the penalties that may be assessed when violations are discovered. The Penalty Mitigation Policy should help to alleviate some of those fears. We will also consider the possibility of inspections incentives and some type of endorsement of the program (i.e. a certificate, sticker) by the Department, and possibly with EPA.

The Delaware program will also expand to include web based reporting of the self-certification. Delaware has an Environmental Navigator system that is a database and tracking system managed by DNREC employees and accessible to the public for review. Information includes the facility's address, compliance history, permits, inspection information, ambient monitoring data, and required reporting information. We plan to explore the possibility of tying the self-certification reports into the Delaware Environmental Navigator system. To help expand the number of business that will submit their reports on line, we will educate businesses where they can go and have free access to a computer so that they can submit their reports on line and have access to compliance assistance materials that are available on the web. The web-based self-certification reporting would also make reviewing the reports easier for DNREC. We would also make as many of our compliance assistance tools as possible available on the web for review.

The project will take a two year period to complete, followed by a three month period for completion and submittal of a final report on the project. The workplans for the project are outline below:

Phase I

Phase I will last approximately 9 months and will begin with the development of a database for tracking the information gathered during this project. Phase I will also include an identification period of the auto body industry, our targeted audience. This will be done in conjunction with the Department of Revenue, Economic Development Office, Chambers of Commerce, Department Databases, local community groups and trade associations as well as checking listings in the yellow pages. Concurrently, our contractor will be developing the inspector check list. The contractor will also begin development of the self-certification forms and workbook, fact sheets, and other compliance tools while we are developing training workshops to address the environmental regulations and beyond compliance components which would continue on in the initial part of Phase II.

Phase II

Phase II would follow phase I and would last about one year. Phase II will include determining the number of body shops that are representative of the entire universe of auto body shops in the State of Delaware and visiting these shops for an initial compliance assessment. The results of the initial compliance assessments will be used as a baseline for compliance data at the start of the project. During this phase, DNREC will clarify that the initial compliance assessment visits are not official enforcement inspections and that penalties for any violations discovered will be considered under the Delaware Penalty Mitigation Policy (as revised June 7, 2000. Illegal chop shops would be reported to the local police department. The self-certification work book and forms that were started in phase I will be completed during the early part of this period as well as other fact sheets and workshops to provide compliance assistance. Once the compliance assistance tools are completed, distribution of the materials and compliance assistance activities will be conducted. Compliance assistance activities and responses will be tracked. Follow up inspections will be completed near the end of Phase II. During phase two we will develop statistical methods for measuring or calculating the environmental impact of compliance assistance solutions.

During phase I and phase II, the Navigator web based system will be set up to accept the self-certification report.

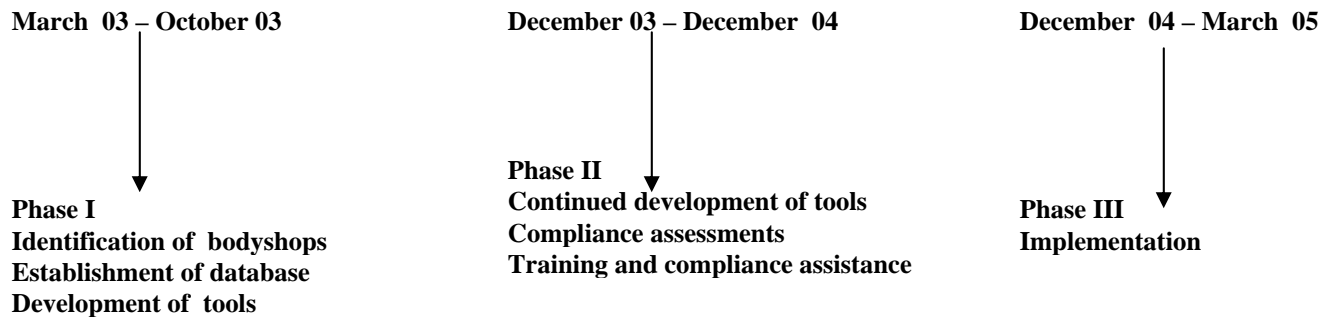
Phase III

Phase III would last approximately 3 months. Phase III will be the final implementation phase. This is when auto body shops should begin submitting their self-certification forms and the program is implemented in full. Once the project is implemented it should be able to support itself with minimal resources from the Agency. The largest component of phase III will be the staff review of submittals of the compliance self-certification report. The regulatory staff within DNREC will be responsible for review of the self-certification report and follow-up on violations reported by the auto body shop.

Analysis and Reporting

Following the conclusion of Phase III, there will be a three month period when analysis of the project is completed and a final report on the project will be submitted.

We anticipate beginning this project in March of 2003 but would be flexible based on when the grant funding was awarded.



Project Budget

<i>State Match</i>	\$10,376
<i>Contractual</i>	
Assist with development of training tools and self-certification	\$61,000
Check list to make Delaware specific	
Assist with Compliance Assessments	
Contract with Pennstar or similar program to provide training in Delaware (workshops)	\$15,000
Facilities to hold workshops	\$ 2,883
Web based reporting system and remote reporting locations	
In each county	\$20,000
Supplies	

Copying/Printing Costs .	\$ 5,000
State Car Rentals	\$1,000
Postage	\$ 500
<i>Supplies</i>	
General office supplies	\$5,000
Computers	
2 Computers and 1 laptop	\$6,000
<i>Audit Fee</i> (.1% of total federal dollars)	\$ 117
Federal Funds Requested	\$116,500
Total Project Budget	\$126,876