

Tackling a New NESHAP – Steps to Assist in Outreach/Compliance Assistance Efforts

Task Completed?	Task	Results
<input type="checkbox"/>	1.) Read the NESHAP	
	<ul style="list-style-type: none"> • Usually found on EPA's Air Toxics webpage: <ul style="list-style-type: none"> ○ www.epa.gov/ttn/atw/ ○ www.epa.gov/ttn/atw/urban/arearules.html • Subscription services available to receive Federal Register Notices <ul style="list-style-type: none"> ○ www.epa.gov/fedrgstr/subscribe.htm 	
	What are the details of the regulation?	
	<ul style="list-style-type: none"> • Does the regulation affect major sources only or does it include area sources? 	<input type="checkbox"/> Major Only <input type="checkbox"/> Both <input type="checkbox"/> Area Only
	<ul style="list-style-type: none"> • Does it affect small businesses? 	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<ul style="list-style-type: none"> • Date of proposed NESHAP? 	/ /
	<ul style="list-style-type: none"> • Date of Final Rule? 	/ /
	<ul style="list-style-type: none"> • Is there a distinction between new and existing units? <ul style="list-style-type: none"> ○ If so, what is the date to distinguish this? 	<input type="checkbox"/> Yes <input type="checkbox"/> No / /
	<ul style="list-style-type: none"> • Initial notification required? <ul style="list-style-type: none"> ○ If so, what is the Initial Notification date? 	<input type="checkbox"/> Yes <input type="checkbox"/> No / /
	<ul style="list-style-type: none"> • First compliance date? 	/ /
	<ul style="list-style-type: none"> • Are there other reporting/compliance requirements? (For example, Notification of Compliance; Performance tests; etc.) If so, what? 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	2.) Find potentially affected sources. (Numbers, Addresses, business types)	
	<ul style="list-style-type: none"> • What are the potentially affected SIC Codes? 	
	<ul style="list-style-type: none"> • Check with SBDCs to find sources; or • Business Library Searches of SIC Codes and small business criteria to find potentially affected. <ul style="list-style-type: none"> ○ For example, MN uses: www.jjhill.org/Research/index.html 	<input type="checkbox"/>
	<ul style="list-style-type: none"> • Trade association websites - obtain list of members, if provided. 	<input type="checkbox"/> website:
	<ul style="list-style-type: none"> • Number of potentially affected facilities? 	
	<ul style="list-style-type: none"> • Has mailing list been generated? 	<input type="checkbox"/> Yes <input type="checkbox"/> No

<input type="checkbox"/>	<p>3.) Who else may be involved with this regulation? (names, address, phone numbers)</p>	
	<ul style="list-style-type: none"> • Industry Representatives? 	
	<ul style="list-style-type: none"> • Trade Associations? <ul style="list-style-type: none"> ○ Federal contact: ○ State Contact: 	
	<ul style="list-style-type: none"> • Regulatory Agency? <ul style="list-style-type: none"> ○ Federal contact: ○ State contact: 	
	<ul style="list-style-type: none"> • Pollution Prevention Assistance? 	
<input type="checkbox"/>	<p>4.) Establish a network of partners.</p>	
	Nationally:	
	<ul style="list-style-type: none"> • Have other state or federal programs developed information already? <ul style="list-style-type: none"> ○ If so, who? • Are there other state or federal programs <u>currently</u> working with this NESHAP? <ul style="list-style-type: none"> ○ If so, who? • Are there other programs that I could work with to develop the materials on this rule, so we don't work on the same stuff at the same time? 	<p>who? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>who? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>who? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	Locally:	
	<ul style="list-style-type: none"> • Are there other programs in our state that are working on this effort or something similar? • Are there other partners within our state that I could work with to develop materials? (P2 colleagues, SBDCs, regulatory agency, etc...) 	<p>who? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>who? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<input type="checkbox"/>	<p>5.) Assess the needs of the potentially affected facilities. "What do they need to know about the NESHAP?"</p>	
	<ul style="list-style-type: none"> • Perform a pre-project survey (site visits, surveys, etc.): <ul style="list-style-type: none"> ○ What other items do businesses need to know? (i.e. what are <u>their</u> needs – hazardous waste, water, etc...?) ○ When are the business cycles for the industry? (i.e. busy times to avoid) ○ What time of day is the best to reach facilities? (day or night?) ○ Are there other hot topics that should be addressed? 	

<input type="checkbox"/>	<p>6.) What are the best methods for reaching the businesses? (Approach may depend on the numbers of potentially affected facilities)</p>													
	<ul style="list-style-type: none"> • Is it a small enough number to have direct contact? • Is a mailing appropriate? • Newsletter articles • Training/Workshops • Association newsletters or mailings • Demonstrations of equipment 	<table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> </table>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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<input type="checkbox"/>	<p>7.) Develop compliance assistance tools.</p>													
	<ul style="list-style-type: none"> • Have tools already been developed or are in the process ? For example, EPA TTN implementation efforts: www.epa.gov/ttn/atw/eparules.html • Notification form • Applicability flow charts For example, Texas' efforts on Part 63 NESHAPs: http://www.tnrc.state.tx.us/permitting/airperm/opd/63/63hmpg.htm • Fact sheets • "Self-audit" checklists for air and other media • Demonstrations of equipment • Quantify the before/after effect of the assistance <ul style="list-style-type: none"> ○ Resources for measuring performance: http://www.smallbiz-enviroweb.org/perfmeas/perf.html 	<table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> </tr> </table>	<input type="checkbox"/> Yes	<input type="checkbox"/> No		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
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<input type="checkbox"/>	<p>8.) Can pollution prevention measures be utilized to help in reductions of waste/emissions?</p>													
	<ul style="list-style-type: none"> • Develop tools tailored to the industry to assist in P2 efforts (Examples: www.p2pays.org or www.p2rx.org) • Quantify the before/after effect of the assistance • Can measures be taken to reduce regulatory burden? (Can they get out of the regulation or permit by switching to a less toxic but viable alternative?) 	<table style="width: 100%; border: none;"> <tr> <td></td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> </table>		<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/> Yes	<input type="checkbox"/> No						
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<input type="checkbox"/>	<p>9.) Document efforts. Once outreach efforts have been completed, make sure information is documented to assist new companies or other states that are interested in implementing their compliance needs.</p> <ul style="list-style-type: none"> • Using the Fiberglass Reinforced Plastics NESHAP as an example, MN has provided a CD to other programs with information about their FRP outreach efforts. KY has organized a webpage with links to other state's efforts. 													