

NATIONAL COMPLIANCE ADVISORY PANEL

RECENT ACTIVITIES



The National Compliance Advisory Panel (NCAP) is committed to supporting the state SBAPs and CAPs, and develops and implements strategies and activities structured to achieve that goal, in coordination with the SBO/SBAP National Steering Committee (NSC).

NCAP Statement on Multi-Media Services - As small business owners/representatives, the NCAP strongly supports the concept of “one-stop-shopping” for small businesses, appreciates and recognizes those programs that have expanded their scope, and encourages the conversion of other state SBAPs to multi-media services. This White Paper, which was finalized in 2004, is intended to express the NCAP’s support for conversion to multi-media services. The NCAP intends to use this document in its outreach efforts on behalf of the state programs, and hopes that states will use it as a tool to try to convince state environmental managers and legislators in their pursuit of providing multi-media services.

Multi-Media Initiative - Due to a changing environment at EPA, the NSC requested that the NCAP take the lead in pursuing multi-media authority and associated funding for the state SBAPs. After much careful deliberation, the NCAP requested that the NSC poll the states to assess the level of interest. The NSC developed several key questions which they posed to all states in November, 2005. Twenty-three states responded. The results indicate that: 1) there seems to be general support to take action; 2) four states – Florida, Michigan, Wyoming, and Wisconsin – meet the criteria of supporting the effort, having an active state CAP, and currently providing only air-related compliance, and could serve as a kick-off or pilot for the initiative; 3) many states support lending the weight of the NCAP to improve existing multi-media programs. Based on these results, the NCAP, in collaboration with the leadership of the NSC, has outlined an Action Plan which includes a Grassroots Support Campaign, and has established a “Multi-Media Outreach Committee.” Full details of the Action Plan appear under the heading “Multi-Media Initiative Update” in this newsletter.

NCAP Guidelines – The NCAP was established in 2001. Its original guidelines were fashioned after the NSC guidelines. Through the past three years, various situations have arisen which indicated that the guidelines did not adequately address the needs of the NCAP. Thus, revised guidelines were developed and thoroughly reviewed by all members. Final revised NCAP Guidelines were approved during the NCAP meeting held in conjunction with the National Conference in Sacramento in 2004. Subsequently, on March 15, 2005, based on feedback from the NSC, members voted to revise the guidelines to clarify member release language.

State CAP Continuity - Recent data indicates that an increasing number of states have dysfunctional or no CAPs. The NCAP is very concerned about this fact and is exploring ways to revitalize the state CAPs. To that effect, an analysis was made of the current status of all state CAPs, several discussions and brainstorming sessions have taken place, and a “CAP Continuity Committee” has been established to propose a strategy and action plan. More information will be shared as it is developed.

2005 Inaugural SBO/SBAP/CAP Training – Honoring the request both from previous CAP Training participants and from the 2005 Conference Planning Committee for a joint SBO/SBAP/CAP training program to facilitate interaction and communication among the three Program components, EPA’s Small Business Division (SBD) held the inaugural SBO/SBAP/CAP Program Training Workshop in conjunction with the National Conference in Biloxi, Mississippi. The training was developed as a joint effort of the SBD; the leadership of the National Steering Committee and of the NCAP; and the 2005 conference host state. The training was hailed a success. NCAP representatives on the Training Development Team were Ken Legler and Frances Hartwell.

Regional Call Participation – During the 2003 National Conference in Baltimore, the NCAP requested that the National Steering Committee poll regional representatives on potential participation by NCAP regional representatives in regional calls. The poll indicated that, while not all regions have regular conference calls, those that do would welcome participation by NCAP members. Although a couple of NCAP members are regularly informed of call schedules and participate, most are not and thus cannot participate. Please be sure to invite your NCAP regional representative to participate in your calls so he/she can stay aware and involved. This is another effort by the NCAP to establish more direct communication with state CAPs and SBAPs in their regions.

SBO/SBAP National Steering Committee Subcommittees – Two years ago, the National Steering Committee expressed an interest in having the NCAP represented in its various subcommittees to directly provide the small business perspective. NCAP members are willing to participate. To date, Reimar von Kalben, Region 8, and Glenn Heilman, Region 3, serve on the Awards Subcommittee; Bob Nicholson, Region 5, served on the Multi-Media Subcommittee; Gary Dawson, Region 4, served on the Promotional Subcommittee; NCAP Vice Chair Frances Hartwell, Region 10, represents the NCAP on the SBO/SBAP NSC, served on the 2005 National Conference Planning Committee, currently serves on the 2006 National Conference Planning Committee, and serves on the Auto Body Refinishing Workgroup of the Technical Subcommittee.

Rule Development – In support of the efforts of the NSC Technical Subcommittee regarding the proposed 50 area source rules, the NCAP sent a letter to all state CAP members urging their response to the Subcommittee’s request for information regarding current state rules and potentially affected sources. Additionally, NCAP Vice Chair Frances Hartwell, Region 10, serves on the Auto Body Refinishing Workgroup of the Technical Subcommittee and has actively participated in workgroup activities, providing valuable small business perspective, comments, and input on proposed language. Gary Dawson, Region 4, reviewed and provided valuable input on both the CAA Title V Deferral and Exemption for drycleaners and on the Perchloroethylene NESHAP Residual Risk Rule.