

Region 5 Area Source Effort And Now for Something Completely Different...

Renee Lesjak Bashel
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Reaching Area Sources With Limited Resources

- Use ERP on Autobody Refinishing sector
 - Combine population of shops in six states
 - Focus on urban areas and the NESHAP
 - enlisted EPA Region 5 enforcement to join partnership
 - Start with Autobody Common Measures indicators
 - developed by 10 states under separate SIG project
 - address requirements in NESHAP
 - discussing other media and/or BMPs



What is ERP again?

- Use statistical approach to measure performance in a sector
- Create EBPIs – sub-set of regulatory and best management practices that apply, single or multi-media
- Report results with selected confidence level and confidence interval
- Facility self-certification offers insight into their perception of performance – not statistically analyzed



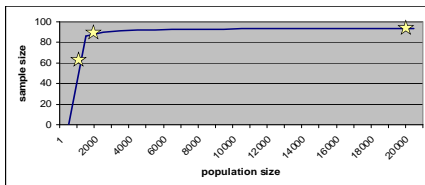
One Size Fits All

- Use urban areas in all six states combined as universe and pull sample
 - total about 6000, sample minimum 140 total
 - if one state did ERP, would need 140 sample size
 - using 90% confidence level
- States each take proportional sample
 - minimum 15, maximum ~35
 - using at least 15 allows possible measure of individual state data, with larger margin of error
 - states can do more if desired – EPA won't match



Economy of Scale

- A population of 200 requires a sample size of 65
- A population of 2000 requires a sample size of 90
- A population of 20,000 requires a sample size of 94



* margin of error +/-10% and confidence level 95%



You Are A Winner!! Of A Free Site Assessment

- Baseline visits to measure initial compliance
 - randomly selected
 - collect data on key performance indicators (EBPIs)
- ERP 101 ↑
Region 5 ↓
- SBEAPs conduct baseline site visits
 - use "urban" population for random list
 - just site-assessments, not compliance visits
 - new concept to "cold call" to initiate site visits
 - use common checklist to measure EBPIs
 - manage data so that facility identification is confidential




Doing What We Do Best Together

- Conduct outreach and training
 - provide compliance assistance materials
 - training on materials and use of self-assessment

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- Region 5 plan
 - more consistent materials and plan for training across states
 - look for efficiencies with collaboration
 - web training?
 - bulk printing of materials




Do They Really Understand The Rules?

- Collect self-assessments w/certification

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- Use ERP "self-certification" to integrate *Notification of Compliance Status* for EPA
 - tie to NOCS mandatory submittal date
 - EPA can follow up on non-filers
 - need strategy for confidential collection of data on performance indicators outside of NESHAP




Check To See If Performance Improved

- Follow-up visits to measure changes in compliance
 - randomly selected, collect data on EBPIs again
 - potential for targeted visits based on self-certifications

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- Region 5 EPA staff conduct follow up compliance inspections
 - collect same core data on NESHAP (EBPIs) as SBEAPs – maybe other media, or maybe not
 - use same "urban" universe for random list of shops




Measure What We Did

- Statistical analysis of baseline and post-certification data collection
 - Did activities between visits have an impact on the performance of the industry?

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- Project will specifically measure the outcome of techniques used by Region 5 SBEAPs
 - Won't be state specific unless they have sufficient sample size on own
- Common Measures comparisons with other states



Questions?

- Renee Lesjak Bashel
- WI Department of Commerce
- Small Business Clean Air Assistance Program
- 608.264.6153
- Renee.Bashel@Wisconsin.gov

