United States
Environmental Protection
Agency

Office Of Policy
(2131)

EPA 233-R-98-001
December 1998

Status Of The State Small Business Stationary Source Technical And Environmental Compliance Assistance Program (SBTCP)

Report To Congress For The Period January To December 1997

REPORT TO CONGRESS

STATUS OF THE STATE SMALL BUSINESS STATIONARY SOURCE TECHNICAL AND ENVIRONMENTAL COMPLIANCE ASSISTANCE PROGRAM (SBTCP)

FOR THE REPORTING PERIOD JANUARY - DECEMBER 1997

PRESENTED BY:

KAREN V. BROWN
SMALL BUSINESS OMBUDSMAN
OFFICE OF THE SMALL BUSINESS OMBUDSMAN
U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC

DECEMBER 1998

ACKNOWLEDGMENTS

The U.S. Environmental Protection Agency's (EPA's) Small Business Ombudsman is grateful for the support of the dedicated staff of the State Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCP), including the Small Business Ombudsmen (SBOs), Small Business Assistance Programs (SBAPs), and the Compliance Advisory Panels (CAPs) in the preparation of this third Annual Report to Congress. All states and territories submitted timely reports to make this report complete and comprehensive.

TABLE OF CONTENTS

Page

ACKNOWLEDGMENTS I

LIST OF COMMON ACRONYMS iv

EXECUTIVE SUMMARY v

1.0 INTRODUCTION AND REPORT OVERVIEW 1-1

1.1 Rationale and Objective of the Report to Congress 1-1
1.2 Data Collection Methodology 1-1
1.3 Organization of the Report 1-3

2.0 OVERVIEW OF THE SBTCP 2-1

2.1 Small Business Ombudsman 2-1
2.2 Small Business Assistance Program 2-2
2.3 Compliance Advisory Panel 2-2
2.4 EPA's Responsibilities Under Section 507 of the CAA 2-3
2.5 Federal Small Business Assistance Program 2-3

3.0 SBTCP STATUS, BUDGETS, STAFFING AND ORGANIZATION 3-1

3.1 Operating Status 3-1
3.2 Budgets 3-3
3.3 Staffing Levels 3-9
3.4 *Administrative Locations of SBO and SBAP Components* 3-12

4.0 SBTCP ACTIVITIES AND SERVICES 4-1

4.1 Industry Sectors Assisted by the SBTCPs 4-1
4.2 Principal SBO, SBAP, and CAP Activities and Services 4-3
4.3 SBTCP Financial Assistance Programs 4-8
4.4 Minimizing Duplication Through Cooperative Efforts 4-9
4.5 SBTCP Compliance with Section 507(d)(2) 4-12

5.0 PROGRAM EFFECTIVENESS 5-1

5.1 Comments Received on SBTCPs 5-1
5.2 Concerns/Inquiries Received and Resolution Strategies Employed . 5-1
5.3 Program Highlights and Accomplishments 5-3

6.0 COMPLIANCE ASSURANCE ISSUES 6-1

6.1 Common Compliance Problems 6-1
6.2 Improvements in Regulatory Understanding and Compliance 6-3
6.3 Recommended Changes to Facilitate Small Business Compliance with the CAA 6-5
6.4 Program Confidentiality and Conflict of Interest 6-7

TABLE OF CONTENTS
(Continued)

LIST OF TABLES

Table No.	Title	Page
3-1	Operating Status of the SBTCP Components	3-2
3-2	Start of Operations for SBTCP Functions	3-2
3-3	1997 SBTCP Operating Budget Ranges	3-4
3-4	1997 SBO Operating Budget Ranges	3-5
3-5	1997 SBAP Operating Budget Ranges	3-6
3-6	1997 CAP Operating Budget Ranges	3-7
3-7	SBTCP Reporting Period Budget Comparisons	3-8
3-8	Staffing Levels (as FTEs) Serving the SBO & SBAP Functions	3-11
3-9	CAP Appointments	3-12
3-10	Administrative Locations of SBO and SBAP	3-12
4-1	SBO/SBAP Outreach Activities	4-4
4-2	Information Available on SBAP WWW Pages and BBS	4-5
4-3	Major CAP Activities	4-6
4-4	Frequency of Meetings Among SBOs, SBAPs, and CAPs	4-7
4-5	Financial Assistance Programs	4-8
4-6	Programs That Report Cooperative Efforts for SBTCP Functions	4-10
4-7	SBTCP Mechanisms for Avoiding Duplication	4-11
4-8	SBTCP Activities to Follow the Intent of the Paperwork Reduction Act	4-13
4-9	SBTCP Activities to Follow the Intent of the Regulatory Flexibility Act	4-14
4-10	SBTCP Activities to Follow the Intent of the Equal Access to Justice Act	4-15
6-1	Common Compliance Problems	6-2
6-2	Improvements in Regulatory Understanding	6-3
6-3	SBTCP Recommendations for Improving Compliance	6-6

APPENDICES

A	1997 SBTCP Reporting Form
B	Federal Small Business Ombudsman
C	Federal Small Business Assistance Program
D	SBTCP Status, Budgets, Staffing, and Organization
E	SBTCP Activities and Services
F	Program Effectiveness
G	Compliance Assurance Issues

LIST OF COMMON ACRONYMS

Provided below is a list of the major abbreviations and acronyms which are commonly used in this report.

CAA	Clean Air Act as amended in 1990
CAP	Compliance Advisory Panel
COI	Conflict of Interest
EPA	Environmental Protection Agency
FTE	Full-time Equivalent
ICR	Information Collection Request
OECA	Office of Enforcement and Compliance Assurance
OMB	Office of Management and Budget
P2	Pollution Prevention
SBAP	Small Business Assistance Program
SBO	Small Business Ombudsman
SBTCP	Small Business Stationary Source Technical and Environmental Compliance Assistance Program
SIC	Standard Industrial Classification
SIP	State Implementation Plan

EXECUTIVE SUMMARY

The U.S. Environmental Protection Agency's (EPA's) Small Business Ombudsman (SBO) is pleased to submit this third Annual Report to Congress describing the activities and accomplishments of the state Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCPs) during the reporting period, January 1 - December 31, 1997.

This report is being submitted in accordance with Section 507(d), *Monitoring*, of the Clean Air Act, as amended in 1990 (CAA), which directs EPA to provide Congress with periodic reports on the status of the SBTCPs. This oversight responsibility has been delegated by the EPA Administrator to EPA's Small Business Ombudsman (SBO). The Report also includes a general report on the SBO's actions to monitor the SBTCPs.

This report addresses two of the EPA SBO's key oversight responsibilities:

- Render advisory opinions on the overall effectiveness of the SBTCPs, difficulties encountered, and degree and severity of enforcement [507(d)(1)].
- Make periodic reports to Congress on compliance of the SBTCPs with the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act [507(d)(2)].

The SBTCPs are designed to assist small businesses in complying with the requirements of the CAA through state-operated programs. Each SBTCP is required to include three components or functions: an SBO, a Small Business Assistance Program (SBAP), and a Compliance Advisory Panel (CAP).

During this third year of monitoring the SBTCPs, over 78,500 small businesses have been directly reached, and almost 6,000 on-site consultations have been conducted (as tallied by assistance efforts to specific industry sectors). SBTCP staff members continue to fill an important role as facilitator or mediator between small business owners/operators and regulatory agencies, enhancing communication to promote understanding and sensitivity on both sides. Based on the information reported, improvements in compliance occur because businesses have someone to turn to for assistance and advice, and to act as an effective liaison with regulatory agencies.

SBTCP yearly operational growth has stabilized over the past several years. As of the end of 1997, 50 SBOs (94 percent), 52 SBAPs (98 percent), and 39 CAPs (74 percent) were operational. The SBO function is staffed with 2 or fewer full time equivalents (FTEs) in 77% of the program, and the SBAP function has 4 or fewer FTEs in 70% of programs; these figures are the same as the last two years. Fifty-eight percent of programs (the same as last year) report that at least the required 7 members have been appointed to their CAPs.

Budgets for the SBTCPs have a wide range from $13,000 to over $2,000,000 for 1997. 98 percent of SBOs (42 of 43) with their own budgets operate their programs with less than $200,000. Similarly, of the 44 SBAPs with their own budgets, 93 percent are allotted less than $400,000. As programs mature and the cost of establishing programs stabilize, more programs are projecting fairly consistent budgets for the next reporting period (39 this year versus 26 last year). The number of programs projecting budget increases has declined from 12 last year to 6 this year.

Ninety-one percent of SBTCPs provided specific information on the types of industry sectors and number of facilities that their programs assisted. Seventy-one industry sectors received assistance in 1997 (the number of industry sectors has been consolidated from 1996). The top ten industry sectors receiving assistance (general and on-site) by SBTCPs in 1997 were:

1. Printing/Graphic Arts
2. Other (not classified)
3. Auto/Body Maintenance, Refinishing, Repair
4. Dry Cleaners/Laundry Services
5. Machine/Equipment Manufacturing & Repair
6. Metal Fabricating/Finishing
7. Government
8. Manufacturing, Miscellaneous
9. Gasoline Distribution (Wholesale/Retail)
10. Furniture Manufacturing/Repair/Wood Finishing.

On-site visits were characterized as being highly effective in providing the individualized attention often required to assist a facility in achieving compliance. The top ten industry sectors that received on-site assistance were:

1. Auto/Body Maintenance, Refinishing, Repair
2. Gasoline Distribution (Wholesale/Retail)
3. Dry Cleaning/Laundry Services
4. Other (not classified)
5. Metal Fabricating/Finishing
6. Paints & Painting/Coatings
7. Printing/Graphic Arts
8. Saw Mills/Logging/Wood Products
9. Manufacturing, Miscellaneous
10. Construction/Contractor.

The top ten industry sectors that received assistance from the most programs were:

1. Dry Cleaning/Laundry Services (39 programs)
2. Auto/Body Maintenance, Refinishing, Repair (37 programs)
3. Printing/Graphic Arts (36 programs)
4. Furniture Manufacturing/Repair/Wood Finishing (27 programs)
5. Other (not classified) (26 programs)
6. Electroplating/Chrome Plating (23 programs)
7. Metal Fabricating/Finishing (21 programs)
8. Manufacturing, Miscellaneous (20 programs)
9. Gasoline Distribution (Wholesale/Retail) (19 programs)
10. Sawmills/Logging/Wood Products (18 programs).

Toll-free hotlines, fact sheets, brochures, seminars, and meetings are among the wide range of outreach mechanisms used to serve the small business community. Other state-of-the-art outreach activities, such as Internet home pages, are seeing increased use. The number of programs with web pages more than doubled from 13 in 1995 to 28 in 1996, and rose again in 1997 to 41.

Seventy-nine percent of SBOs (down from 87 percent in 1996), 91 percent of SBAPs (up from 87 percent in 1996), and 49 percent of CAPs (up from 38 percent in 1996) report some sharing of resources within their state/territory. Generally, programs recognize the efficiency and value of coordinating their efforts with each other and also with environmental agency departments, state agencies, and other organizations.

Ninety-eight percent of programs (as compared to 92 percent last year) report actions have been taken to minimize duplication of efforts among SBTCPs. Sharing information is a

practical approach to maximizing program efficiency while enhancing the cost-effectiveness of funding spent on individual programs.

Section 507 directs EPA's SBO to monitor the SBTCPs' efforts to follow the intent of the provisions of the Paperwork Reduction, Regulatory Flexibility, and Equal Access to Justice Acts.

- Eighty-nine percent of programs (as compared to 58 percent last year) report taking specific actions associated with paperwork reduction, with the most common action being the production of concise, easy-to-read summary documents.
- Eighty-nine percent of programs (up from 51 percent) report taking specific actions consistent with the intent of the Regulatory Flexibility Act. The primary activity by programs was reviewing SBTCP documents for compliance.
- Seventy-five percent of SBTCPs (as compared to 34 percent last year) reported specific actions similar to those associated with the Equal Access to Justice Act. These include the establishment of pro bono legal services, the availability of funding for technical assistance services for citizen groups aggrieved by permit actions of a regulatory agency, and the review of SBTCP documents for compliance.

The number of programs reporting specific actions to follow the intent of the provisions of these Acts grew in 1996 and again in 1997. The steps being taken appear to be better targeted to the specific intent of each Act and in addressing the unique needs of small businesses.

Seventy-two percent of SBTCPs report that small businesses provided comments on the assistance programs and that feedback was overwhelmingly positive. Common themes were similar to those in 1995 and 1996. Small businesses appreciated the availability of non-regulatory assistance for certain problems and the personalized guidance through the many regulatory processes leading to compliance.

Forty-seven percent of programs provided examples of concerns/inquiries received and resolution strategies employed. Resolution of issues between the small business and regulatory communities comprises a significant portion of the SBTCPs' activities, which included:

- Developing plain language explanations of regulatory requirements.
- Providing one-on-one guidance through the paperwork process.

Facilitating communication about regulatory flexibility and compliance assistance issues between small business and regulatory agencies.

Ninety-six percent of the SBTCPs (the same as 1996) provided insight on the types of compliance issues addressed during the course of providing technical assistance to small businesses. The two most common compliance problems mentioned by small businesses were, "Not understanding the regulatory requirements," and "Uncertain how to determine emission inventories." Programs reported, "More open communication between sources and agencies," and "Greater understanding and awareness of regulations," as results of program outreach efforts.

Generally, programs report that small businesses want to comply with environmental regulations; however, they may be afraid to ask for help. When a non-threatening assistance program, such as the SBTCP, is available, small businesses are eager to take advantage of the services, as this help increases chances of survival and profitability.

Forty-two SBTCPs provided recommendations for changes to facilitate small business compliance with the CAA. As in 1995 and 1996, the most frequent recommendation was flexibility in applying regulations to small businesses (28 percent of programs).

In addition to inquiries regarding air issues, many programs have or are considering expanding their services to encompass multimedia issues. Twenty-six percent of programs recommended expanding assistance to cover multimedia programs (i.e., air, water, solid waste) for enhancing compliance.

Programs were asked to describe how their SBTCP avoids internal or external conflicts of interest or the perception that their program may not be confidential. Eighty-five percent of programs reported no problems concerning confidentiality or with conflict of interest issues during the course of providing services regardless of whether a confidentiality policy is in place. Program structures range from a guarantee of confidentiality (most common) to offering no confidentiality. Many programs have policies that protect small businesses from penalties if violations are discovered during the course of their receiving technical assistance.

The SBTCPs offer important one-on-one contacts, provide valuable information such as the need to have operating permits, maintaining records, compliance options, pollution

prevention technologies and techniques, and compliance requirements. This assistance enables small businesses to arrive at informed decisions and more effectively come into compliance.

CONCLUSIONS AND RECOMMENDATIONS

As has been noted since 1995, SBTCPs are being run by hardworking, dedicated staffs who operate successful programs with what they report to be often limited budgets and resources. Small businesses are grateful for the technical assistance and personalized attention from people they can trust. In this third year of gathering information from the programs, over 78,500 small businesses have been reached, and almost 6,000 on-site consultations have been performed (as tallied by industry sector).

SBTCPs facilitate dialog between the small business community and the regulatory community, fostering trust, and improving attitudes and awareness towards regulatory compliance.

SBTCPs have significant expertise and are increasingly becoming multimedia as states want to offer this type of assistance, and small businesses are requesting it. Programs are seeking ways to expand the scope and quality of the services they offer and the means to fund the enhanced services. To maximize their budgets and staffing capabilities and to minimize duplication of effort, programs are encouraged to use the resources of the federal SBO and SBAP.

Commonly identified compliance problems include not understanding regulatory requirements and uncertainties as to determining emission inventories. SBTCPs indicated that reasons for these problems included the overwhelming volume of regulations and the lack of small business' technical expertise needed to comply. Many current SBTCP activities have remedied such problems. The concerns regarding these problems underscore the critical role of the SBTCP in providing vital technical assistance and promoting compliance by establishing trust and greater understanding.

Programs are to be commended for their accomplishments in continuing to promote compliance. Highlights include more open communication between sources and agencies and greater understanding/awareness of regulations by small businesses. SBTCPs report that award programs and loan programs have proven to be effective in providing incentives, both for small businesses and the programs themselves. Programs should consider developing award and loan programs as incentives for their small business customers.

In conducting the Federal program, EPA has followed the requirements of the Paperwork Reduction, Regulatory Flexibility, and Equal Access to Justice Acts. EPA's SBO has monitored SBTCP's activities for following the intent of the provisions of these three Acts. The number of programs reporting specific activities associated with these Acts significantly increased in 1997. The careful review of SBTCP documents and the development of simplified forms and permits are among the positive actions implemented to fulfill the intent of the Acts.

Program activities primarily emphasize mechanisms to reach larger audiences (e.g., mailings, hotlines). However, one-on-one assistance has been reported as the most effective method in bringing small businesses into compliance, and programs are encouraged to increase their emphasis on personalized assistance. Allocation of adequate resources to permit on-site visits by program staff is important. On-site visits (as tallied by industry sector) increased to almost 6,000 in 1997 from over 3,800 in 1996.

With the strong small business technical assistance infrastructure in place through the SBTCPs, programs could explore their potential to expand into multimedia assistance. A number of programs already offer multimedia assistance and industry-specific permitting, which can ease the regulatory burden on small businesses and promote compliance, and several programs are investigating expansion into multimedia services.

Efficiency of information transfer (among SBTCPs and to small businesses) can be realized through the increased use of Internet home pages (and to a lesser extent electronic bulletin boards, which have become less common). Presently, 77 percent of programs operate some type of electronic information transfer, up from 53 percent last year. Such electronic services also would be promising mechanisms to avoid duplication of effort among programs. Programs again are encouraged to explore the potential of the Internet for sharing information with small businesses and with other SBTCPs.

Only 13 percent of SBTCPs reported the availability of financial assistance programs in 1997, up slightly from 11 percent last year. Small businesses have expressed their need for creative financing mechanisms, which was recommended by 21 percent of SBTCPs as a method for enhancing compliance. Programs are encouraged to explore the potential for sponsoring or facilitating financial assistance programs for pollution control or pollution prevention capital expenses.

SBTCPs report that they are often underfunded and understaffed as they provide their current level of services. Because of this, they may be challenged to expand their function both in air-related outreach and multimedia technical assistance. SBTCPs are encouraged to better utilize the expertise of their CAP members to enhance improvements in their technical assistance programs. As has been noted in the two previous Reports, several states still do not have operational CAPs. A number of CAPs also need to address vacancies of the CAP due to expired terms.

1.0 INTRODUCTION AND REPORT OVERVIEW

1.1 RATIONALE AND OBJECTIVE OF THE REPORT TO CONGRESS

The U.S. Environmental Protection Agency's (EPA's) Small Business Ombudsman is pleased to submit this Report to Congress describing the accomplishments and activities of the state/territory Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCP) during the January 1 - December 31, 1997 reporting period.

This report represents the third Annual Report to Congress on this important program designed to help the small business community understand and cost-effectively comply with the requirements of the Clean Air Act Amendments (CAA) as amended in 1990.

This report is being submitted in accordance with Section 507(d), *Monitoring*, of the CAA, which directs the EPA to provide Congress with periodic reports on the SBTCP. This oversight and reporting responsibility has been delegated by the EPA Administrator to the EPA Small Business Ombudsman (SBO).

This report is intended to address two of the EPA SBO's responsibilities with respect to the SBTCP.

1. Render advisory opinions on the overall effectiveness of the SBTCPs, difficulties encountered, and severity of enforcement [507(d)(1)].

2. Make periodic reports to Congress on compliance of the SBTCPs with the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act [507(d)(2)].

1.2 DATA COLLECTION METHODOLOGY

Information to assess the SBTCPs was collected through a relatively simple, standardized Annual Reporting Form, which is designed to streamline the reporting process.

During the fall of 1994, EPA's SBO, with assistance from SBTCP personnel, developed the criteria for a standardized Reporting Form. A draft Form was distributed to the state programs for review in November 1994, and the Form was further refined during the National SBO/SBAP Conference in January 1995. Programs also were asked to comment on EPA's Office of Enforcement and Compliance Assurance's (OECA's) sample questions regarding compliance assessment.

In March 1995, EPA's SBO submitted a "Request for Information Collection Request (ICR) Approval" to the Office of Management and Budget (OMB) for the Annual Reporting Form. The Form subsequently was approved and was assigned OMB Number 2060-0337, expiration date 7/31/98.

In December 1997, EPA's SBO distributed copies of the SBTCP Annual Reporting Form (for the reporting period January through December 1997) to state/territory SBTCP contacts (primarily SBOs). These contacts were requested to coordinate completion of this Form among their SBO, SBAP, and CAP. The Annual Reporting Form was provided in hard copy and on computer disk for ease of completion and to reduce the reporting burden. A copy of the 1997 SBTCP Reporting Form is enclosed as Appendix A.

Programs were not asked to create information that they did not have; therefore, some SBTCPs were not able to answer all questions posed. Based on the information requested in the Reporting Form from the first year of reporting, programs were encouraged to revise the types of statistics they track for subsequent years for simplicity in completing future reports.

Programs were asked to provide the information requested in the Annual Reporting Form and submit the Form to the EPA's SBO by February 15, 1998. The information provided in the Forms was compiled and analyzed to produce this report. The 50 states, plus the District of Columbia, Puerto Rico, and the U.S. Virgin Islands, submitted SBTCP Annual Reports (53 programs total) to EPA's SBO.

In addition, Arizona, California, and Kentucky have distinct air quality districts or counties with regulatory jurisdiction within their states, which also submitted full or partial reports. In Arizona, Maricopa County submitted a separate report. For

California, Kern County and the South Coast Air Quality Management District submitted full reports; partial reports or informational letters were submitted by the following Air Quality Management Districts: Bay Area, Mojave Desert, Monterey Bay, Northern Sonoma County, Sacramento, San Joaquin Valley, San Luis Obispo County, Santa Barbara County, Tuolumne, Ventura County, and Yolo-Solano. For Kentucky, Jefferson County submitted a report. For statistical purposes of this report, data from states that submitted multiple reports have not been combined except where noted. Raw data for the separate air quality districts are shown in the appendices. Percentages have been rounded.

According to the *Federal Register* of November 13, 1996, Volume 61, Number 220, Pages 58284-94, EPA promulgated a direct final rule conditionally exempting the Territory of American Samoa, the Commonwealth of the Northern Mariana Islands (CNMI), and the Territory of Guam from the requirements of Title V of the CAA. Therefore, reports were not received from American Samoa, CNMI, and Guam.

1.3 ORGANIZATION OF THE REPORT

As detailed below, this report is organized into six main sections, the Executive Summary, and Appendices.

Section 1.0 **Introduction and Report Overview**

Section 2.0 **Overview of the SBTCP** -- This section provides an overview of the three components of the SBTCP (i.e., the SBO, the SBAP, and the CAP) as well as EPA's responsibilities under Section 507.

Section 3.0 **SBTCP Status, Budgets, Staffing, and Organization** -- This section encompasses these four categories of information about the SBTCPs.

Section 4.0 **SBTCP Activities and Services** -- In this section, types and levels of services provided by the three components of the states' SBTCPs are discussed including efforts to comply with the Paperwork Reduction, Regulatory Flexibility, and Equal Access to Justice Acts. Financial assistance program information also is included.

Section 5.0 **Program Effectiveness** -- A discussion of program effectiveness based on comments received by the SBO or CAP, as well as resolution strategies for any negative comments are provided. General information on some of the accomplishments and highlights of the programs in 1997 also are outlined.

Section 6.0 **Compliance Assurance Issues** -- Information on the effectiveness of the three components of the SBTCPs in providing compliance assistance support to state small businesses is provided in this section.

Additional details on the information provided by the individual SBTCPs are included in the various appendices to this report.

2.0 OVERVIEW OF THE SBTCP

As part of Section 507 of the CAA, the U.S. Congress mandated that each state/territory establish a SBTCP to assist small businesses comply with the requirements of this Act through state-operated programs. Each SBTCP (also commonly referred to as a "Section 507 program") is required to include the following three components or functions:

- Small Business Ombudsman (SBO)
- Small Business Assistance Program (SBAP)
- Compliance Advisory Panel (CAP).

The CAA also required states/territories to develop a State Implementation Plan (SIP) for implementing an SBTCP by November 1992. As of December 31, 1997, 50 of 53 states/territories (94 percent) had received approval from EPA for their SIPs implementing Section 507 of the CAA. States/territories whose SIPs have not yet been officially submitted and/or approved are:

- Hawaii -- not yet submitted
- Rhode Island -- submitted, but not approved
- Vermont -- submitted draft.

2.1 SMALL BUSINESS OMBUDSMAN

The state/territory SBOs serve as the small business community's representative where small businesses are impacted by the CAA. The SBO's key responsibilities may include:

- Reviewing and provide recommendations to EPA and state/local air pollution control authorities regarding development and implementation of regulations impacting small businesses.
- Assisting in dissemination of information about upcoming air regulations, control requirements, and other matters relevant to small businesses.
- Refering small businesses to appropriate specialists for help with specific needs.
- Conducting studies to evaluate the effects of the CAA on state and local economies, and on small businesses generally.

2.2 SMALL BUSINESS ASSISTANCE PROGRAM

The SBAPs provide information and assistance to small businesses on matters of:

- Determining applicable requirements under the Act and permitting assistance
- The rights of small businesses under the Act
- Compliance methods and acceptable control technologies
- Pollution prevention and accidental release prevention and detection
- Audit programs.

2.3 COMPLIANCE ADVISORY PANEL

The CAPs are created at the state level and are comprised of at least seven members:

- 2 members who are not owners of small business stationary sources -- selected by the Governor to represent the public.
- 2 members who are owners of small business stationary sources -- selected by the lower house of the state legislature.
- 2 members who are owners of small business stationary sources -- selected by the upper house of the state legislature.
- 1 member from the state air pollution permit program -- selected by the head of that agency.

The responsibilities of the CAP are to:

- Render advisory opinions concerning the effectiveness of the SBTCP, difficulties encountered, and degree and severity of enforcement.
- Report on the compliance of the SBTCP with the intent of the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act.
- Submit periodic reports to EPA's SBO.
- Review information for small business stationary sources to ensure it is understandable to the layperson.

2.4 EPA's RESPONSIBILITIES UNDER SECTION 507 OF THE CAA

Section 507(d), *Monitoring*, directs the EPA to monitor the SBTCPs and to provide a report to Congress. This responsibility has been delegated to EPA's SBO, whose oversight duties are to:

- Render advisory opinions on the overall effectiveness of the SBTCP, difficulties encountered, and degree and severity of enforcement [507(d)(1)].
- Make periodic reports to Congress on the compliance of the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act [507(d)(2)].
- Review information issued by the SBTCPs to ensure that it is understandable to the layperson [507(d)(3)].
- Have the federal SBAP serve as the secretariat for the development and dissemination of reports and advisory opinions [507(d)(4)].

Further information on the activities and accomplishments of EPA's Office of the Small Business Ombudsman may be found in Appendix B.

2.5 FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM

EPA, through the Federal SBAP, provides technical guidance for the use of the SBTCPs in the implementation of their programs. Information on the activities of the Federal SBAP may be found in Appendix C.

3.0 SBTCP STATUS, BUDGETS, STAFFING, AND ORGANIZATION

Information on the operating status (Section 3.1), budgets (Section 3.2), staffing levels (Section 3.3), and the administrative location of the three components of the SBTCPs (SBOs, SBAPs, and CAPs) within their states/territories (Section 3.4) for the January - December 1997 reporting period may be found in this chapter.

A listing of state/territory Ombudsman, SBAP, and alternate SBAP contacts is included in Appendix D-1.

3.1 OPERATING STATUS

Importantly, by December 31, 1997, 50 SBOs (94 percent of the 53 states and U.S. territories) and 52 SBAPs (98 percent) had been established and were providing assistance to small businesses. Only 39 programs reported that their CAPs were operating; however, 45 programs reported that the CAPs had been established.

The number of established and operational SBOs remained at 50, the same as 1995 and 1996. The number of established and operational SBAPs remained unchanged at 52 for 1997. Four additional CAPs were established in 1997 (45, up from 41 in 1996), and 3 more CAPs became operational (39 in 1997 versus 36 in 1996).

Operating status for each of the three components of the SBTCPs is shown in Table 3-1 and also identifies those programs whose SBOs, SBAPs, and CAPs are not yet established or operational.

TABLE 3-1
OPERATING STATUS OF THE SBTCP COMPONENTS

	COMPONENTS ESTABLISHED[1]		COMPONENTS OPERATIONAL[1]	
	# Programs	% Programs	# Programs	% Programs
SBO[2]	50	94	50	94
SBAP[3]	52	98	52	98
CAP[4]	45	85	39	74

Note 1: Programs indicated if their SBO, SBAPs, or CAPs had been established (i.e., created by legislation), and if they were also providing services. Programs were considered operational if the SBOs had been appointed, SBAPs were providing services, and CAPs had conducted at least one meeting, even if not all CAP members had been appointed.

Note 2: As of 12/31/97, SBOs were reported not to be established or operating in Hawaii, Massachusetts or Vermont.

Note 3: As of 12/31/97, an SBAP was reported not to be established or operating in Hawaii.

Note 4: As of 12/31/97, CAPs were reported not to be established or operating in 8 programs: California, Hawaii, Illinois, Iowa, Maryland, Massachusetts, Rhode Island, or the Virgin Islands. In addition, 6 other states reported that their CAPs had been established, but not yet operating: Alabama, Arizona, Delaware, District of Columbia, Missouri, and Tennessee.

Details on actual dates (month/year) when the SBOs, SBAPs, and CAPs were reported to be established and operational may be found in Appendix D-2. A summary of the start of operations for the three SBTCP functions is shown in Table 3-2.

TABLE 3-2
START OF OPERATIONS FOR SBTCP FUNCTIONS

	SBO		SBAP		CAP	
	Number	Total	Number	Total	Number	Total
Pre-1990			1	1		
1991			1	2		
1992	12	12	11	13	1	1
1993	20	32	17	30	8	9
1994	10	42	16	46	12	21
1995	7	49	5	51	11	32
1996			1	52	4	36
1997	1	50			3	39
% operational by 12/31/97	94%		98%		74%	

3.2 BUDGETS

Information about the total SBTCP operating budgets may be found in Section 3.2.1, with details on the SBO, SBAP, and CAP budgets contained in Sections 3.2.2, 3.2.3, and 3.2.4, respectively. A comparison of the program budgets for 1996, 1997, and (projected) 1998 is shown in Section 3.2.5.

3.2.1 1997 Reporting Period

As detailed in the paragraphs and tables below, the total operating budgets for the SBTCPs varied from $13,000 to over $2,000,000 for the 1997 reporting year. These extremes include $13,000 for the District of Columbia, whose CAP has not yet begun operations, to New York, reporting a total operating budget of $2,174,000

1997 operating budget ranges for the SBTCPs are shown in Table 3-3; 1996 and 1995 ranges also are shown for comparison. Details on the operating budgets, by program, for the individual SBO, SBAP, and CAP components, including the source of these funds, may be found in Appendix D-3.

TABLE 3-3 1997, 1996, and 1995 SBTCP OPERATING BUDGET RANGES						
	1997		1996		1995	
BUDGET $	# Programs	% Programs[1]	# Programs	% Programs[1]	# Programs	% Programs[1]
0			1	2	2	4
1 - 100,000	10	19	9	17	9	17
100,001 - 200,000	15	28	19	36	14	26
200,001 - 300,000	7	13	5	9	9	17
300,001 - 400,000	12	23	9	17	7	13
400,001 - 500,000	3	6	2	4	2	4
500,001 - 600,000	1	2	2	4	3	6
600,001 - 700,000			1	2	1	2
700,001 - 800,000	1	2				
800,001 - 900,000	1	2	2	4	2	4
>1,000,000[2]	1	2	1	2	1	2
>2,000,000[3]	1	2	1	2	1	2
Report submitted, no data provided[4]	1	2	1	2	2	4
TOTAL	53		53			

Note 1: County budgets are not combined with state budgets, nor are they counted separately.
Note 2: Texas.
Note 3: New York.
Note 4: Hawaii (1997, 1996, and 1995), Florida (1995 only).

The balance of this section provides summary details on the operating budgets for the SBOs, SBAPs, and the CAPs.

3.2.2 SBO Operating Budgets

Forty-three SBOs have their own budgets (versus having their budgets combined with other SBTCP functions). Budgets for these SBOs are concentrated in a range below $200,000, with 42 of 43 SBOs (98 percent) reporting budgets between $0 and $200,000. (The one exception is New York's SBO, who reports a budget of $1,170,000.) The primary source of funding for all programs is Title V fees (49 percent), which are collected at the state/territory level. Other sources of funding

include EPA 105 Grant funds (provided for in Section 105 of the CAA, these funds flow to the states through EPA regional offices), non-Title V air fees, and state permit fees.

The range of 1997 operating budgets for the SBOs with their own budgets is shown in Table 3-4. A comparison of SBO budgets for the past three years is not practical, as a different number of SBOs have had their own budgets each year.

TABLE 3-4
1997 SBO OPERATING BUDGET RANGES
(43 non-combined budgets)

Budget ($)	# Programs	% Total Programs
0 - 25,000	12	23
25,001 - 50,000	10	19
50,001 - 75,000	7	13
75,001 - 100,000	6	11
100,001 - 200,000	7	13
>1,000,000	1	2
Combined budgets[1]	8	15
Report submitted, no data provided[2]	2	4
TOTAL	**53**	

Note 1: Eight SBOs have combined budgets. If a program combined the budget for two SBTCP functions (i.e., SBO/SBAP, SBO/CAP, or SBAP/CAP), they were counted as having a combined budget. However, the budget of the third component of the program also was tallied separately (e.g., a program reporting a combined SBO/CAP budget and a separate SBAP budget was tallied in the "combined budget category" for the SBO/CAP budget and with SBAPs for the SBAP budget).

Note 2: Hawaii and Massachusetts.

3.2.3 SBAP Operating Budgets

Forty-four SBAPs have their own budgets. SBAP budgets are spread across a wider dollar range as compared to the SBOs with 15 of 44 programs (34 percent) between $0 and $100,000, 13 of 44 programs (30 percent) between $100,001 and $200,000, and 7 of 44 programs (16 percent between $200,001 and $300,000. Title V fees again are the main funding source (43 percent of all programs); funds

from EPA 105 Grants, non-Title V fees, indirect funds, and permit fees are also used to support SBAPs.

The range of 1997 operating budgets for the SBAPs with their own budgets is shown in Table 3-5. A comparison of SBAP budgets for the past three years is not practical, as a different number of SBAPs have had their own budgets each year.

TABLE 3-5
1997 SBAP OPERATING BUDGET RANGES
(44 non-combined budgets)

Budget ($)	# Programs	% Total Programs
0 - 25,000	2	4
25,001 - 50,000	3	6
50,001 - 75,000	7	13
75,001 - 100,000	3	6
100,001 - 200,000	13	25
200,001 - 300,000	7	13
300,001 - 400,000	6	11
400,001 - 500,000	1	2
600,001 - 700,000	1	2
900,001 - 1,000,000	1	2
Combined budgets[1]	8	15
Report submitted, no data provided[2]	1	2
TOTAL	**53**	

Note 1: Eight SBAPs have combined budgets. If a program combined the budget for two SBTCP functions (i.e., SBO/SBAP, SBO/CAP, or SBAP/CAP), they were counted as having a combined budget. However, the budget of the third component of the program also was tallied separately (e.g., a program reporting a combined SBO/CAP budget and a separate SBAP budget was tallied in the "combined budget category" for the SBO/CAP budget and with SBAPs for the SBAP budget).

Note 2: Hawaii.

3.2.4 CAP Operating Budgets

Forty CAPs have their own budgets; even though only 39 CAPs are operational, administratively. CAP funding ranges from $0 to a high of $15,000 (one program, Vermont). Eighty-eight percent of CAPs with their own budget operate with a budget of $5,000 or less. Title V fees are the most commonly listed funding source for all CAPs (45 percent).

The range of 1997 CAP operating budgets is shown in Table 3-6. A comparison of CAP budgets for the past three years is not practical, as a different number of CAPs have had their own budgets each year.

TABLE 3-6
1997 CAP OPERATING BUDGET RANGES
(40 non-combined budgets)

Budget ($)	# Programs	% Total Programs
0[1]	13	25
1 - 1,000	3	6
1,001 - 2,000	6	11
2,001 - 3,000	5	9
3,001 - 4,000	1	2
4,001 - 5,000	7	13
9,001 - 10,000	4	8
14,001 - 15,000	1	2
Combined budgets[2]	10	19
Report submitted, no data provided[3]	3	6
TOTAL	53	100

Note 1: CAPs reporting "N/A" or "as needed" also were counted as "0" if they administratively were assigned their own budgets.

Note 2: 10 CAPs have combined budgets. If a program combined the budget for two SBTCP functions (i.e., SBO/SBAP, SBO/CAP, or SBAP/CAP), they were counted as having a combined budget. However, the budget of the third component of the program also was tallied separately (e.g., a program reporting a combined SBO/CAP budget and a separate SBAP budget was tallied in the "combined budget category" for the SBO/CAP budget and with SBAPs for the SBAP budget).

Note 3: Alabama, Hawaii, Virgin Islands.

3.2.5 Comparison of Previous and Projected Budgets

A comparison of budgets from 1996, 1997, and 1998 (projected) is valuable in tracking program growth and resource allocation. Programs were asked to indicate significant budget changes (greater than ten percent) from year to year and to provide insight into any major shifts (more than ten percent) in funding levels. SBTCP reporting period budget comparisons are shown in Table 3-7.

TABLE 3-7
SBTCP REPORTING PERIOD BUDGET COMPARISONS

	BUDGET DECREASE (> 10% change)		BUDGET CONSISTENT (< 10% change)		BUDGET INCREASE (> 10% change)		INSUFFICIENT DATA FOR COMPARISON[1]	
	# Programs	% Programs	# Programs	% Programs	# Programs	% Programs	# Programs	% Programs
1996 to 1997 Reporting Period	5	9	35	66	12	23	1[2]	2
1997 to 1998 Reporting Period	5	9	39	74	6	11	3[3]	6

Note 1: Not all programs provided budget amounts. In order to establish trends, combined budgets for the SBO, SBAP, and CAP were examined. This was necessary, as some programs indicate combined budgets for two or three facets of their programs, while other programs may have had one or two facets of their programs inactive during the previous reporting period.

Note 2: Hawaii.

Note 3: Hawaii, Montana, South Carolina.

In reviewing the combined budgets for the SBO, SBAP, and CAP functions of the SBTCPs, 12 programs (23 percent) indicated a budget increase (of at least ten percent) from the 1996 to 1997 reporting periods. Six programs (11 percent) showed an increase from the 1997 to 1998 reporting periods.

As programs mature and the cost of establishing programs stabilizes, more programs are projecting fairly consistent budgets for the next reporting period (39 this year as compared to 36 last year). The number of programs projecting a budget increase for the subsequent reporting period continues to decline from 11 last year to six this year.

According to responses received, projected budget increases primarily were related to the growth and expansion of SBTCP services and staff additions. Examples of reasons given for budget increases greater than ten percent are provided below:

- In the District of Columbia, a funding increase for 1998 is due to the establishment of the CAP. ($13,000/1997 to $15,000/1998)
- Missouri's funding increased in 1998, because a federal grant was obtained to inform the public of the 112(r) requirements. Also, additional general revenue funding was used to provide air assistance due to the number of assistance requests received. ($395,000/19997 to $505,000/1998)
- Utah's SBO spending increases will be derived from the EPA "Partnership in Compliance" grant. ($248,000/1997 to $332,000/1998)

Thirty five programs (66 percent) report steady budget levels (less than a ten percent change) for the 1996 to 1997 reporting periods, and 39 programs (74 percent) indicate consistent budget levels from the 1997 to 1998 (projected) reporting periods.

Seven programs (19 percent) showed a decrease (more than ten percent) from the 1996 to 1997 reporting periods, and five programs (nine percent) also projected a decrease from the 1997 to 1998 (projected) periods. Budget reductions are often attributed to program reorganizations and consolidations and lower projected costs to maintain a program (versus the higher resource requirements to develop a program).

Eighty-five percent of the programs reported either a consistent or increasing budget from the 1997 to 1998 (projected) reporting periods.

Budgets for the 1996, 1997, and 1998 (projected) reporting periods for the SBO function, SBAP function, and CAP function may be found in Appendix D-4.

3.3 STAFFING LEVELS

Forty-one programs (77 percent) report operating their SBOs with two or fewer full-time equivalents (FTEs) as shown in Table 3-8. This number remained unchanged from 1996.

In 1997, as in 1996, 37 programs (70 percent) operate their SBAPs with four or fewer FTEs, which include both paid and unpaid staff and may include retired engineers. There are some notable exceptions to these staffing levels, such as Louisiana, Indiana, and California, which report using 11, 12, and 20 FTEs, respectively, to support their SBAP function. Also, Texas reported the services of over 50 unpaid "EnviroMentors" who assist with SBAP duties.

Specific details on the number of FTEs, by program, for the SBO and SBAP functions may be found in Appendix D-5.

TABLE 3-8
STAFFING LEVELS (as FTEs[1]) SERVING THE SBO & SBAP FUNCTIONS

# FTEs	# Programs		
	SBO	SBAP	Combined Staffing
0 - 0.09	3		
0.1 - 1	28	13	1
1.1 - 2	10	10	
2.1 - 3	5	11	1
3.1 - 4		3	
4.1 - 5	1	4	
5.1 - 6		1	
6.1 - 7		3	
7.1 - 8	1	1	
10.1 - 11		1	
11.1 - 12		1	
12.1 - 13	1		
19.1 - 20		1	
20+			1
N/A	1	1	
TOTAL	**50**	**50**	**3**

Note 1: An FTE is considered to work 40 hours/week. For example, two people working 20 hours/week would be equivalent to one FTE.

Note 2: Three states (Delaware, Florida and Texas) combined their SBO and SBAP functions. TX reported 15.5 paid SBO/SBAP staff plus 50 volunteer "EnviroMentors" serving the SBAP.

Note 3: Not applicable: SBO-Massachusetts, SBAP-Tennessee.

Fifty-eight percent of programs (the same as percent last year) report that at least the required seven members have been appointed to their CAPs. An overview of CAP appointments is shown in Table 3-9. In CAPs with fewer than seven members, several programs indicated that expired terms on their CAPs have not yet been filled or that their CAPs have not yet been established. Program statistics of the number of CAP members in each category (small business, state agency, general public, not yet appointed, other) may be found in Appendix D-6.

TABLE 3-9 CAP APPOINTMENTS		
	# Programs	% Programs
Minimum 7 members appointed	31	58
Less than 7 members appointed	21	40
Not established[1]	1	2

Note 1: Hawaii.

3.4 ADMINISTRATIVE LOCATION OF SBO AND SBAP COMPONENTS

As shown in Table 3-10, 52 programs indicated that their SBOs are located within a state/territory-related agency, typically the environmental agency (not necessarily a regulatory section). The majority of programs (50) report to have located their SBAPs within a state/territory-related agency, typically the environmental agency. Three programs (Kansas, Kentucky, and Pennsylvania) contract their SBAP function to an outside agency or organization.

As defined in Section 507, the CAPs are to be independent entities, operating outside of any agency.

TABLE 3-10 ADMINISTRATIVE LOCATIONS OF SBO AND SBAP				
Location	SBO		SBAP	
	# Programs[1]	% Programs	# Programs[1]	% Programs
State-related agency	52	98	50	94
University-related (contracted)			2	4
Private contractor			1	2
No response	1	2		
TOTAL	53	100	53	100

Note 1: Numbers are higher than those reported in Table 3-1. Programs without established SBOs or SBAPs indicated where those functions are intended to be located once established.

Complete information for the administrative location of each SBO, SBAP, and CAP may be found in Appendix D-7.

4.0 SBTCP ACTIVITIES AND SERVICES

Information regarding the services and activities of the three components of the SBTCPs is provided in this section. Industry sectors assisted by the SBTCPs are discussed in Section 4.1. An overview of SBO, SBAP, and CAP activities and services is provided in Section 4.2. SBTCP financial assistance services are outlined in Section 4.3. A discussion of how programs minimize duplication through cooperative efforts may be found in Section 4.4. SBTCP efforts to comply with the intent of the Paperwork Reduction Act, Regulatory Flexibility Act, and the Equal Access to Justice Act are summarized in Section 4.5.

4.1 INDUSTRY SECTORS ASSISTED BY THE SBTCPs

Forty-eight SBTCPs (91 percent) (data from county and air district programs were included with their state's activities) provided specific information on the types of industry sectors and number of facilities that their programs assisted in 1997. Small businesses in 71 industry sectors (the number of industry sectors has been consolidated from 1996) were identified as having been assisted by SBTCPs. Certain industry sectors, such as dry cleaning/laundry services and printing/graphic arts, received more assistance, as these sectors are strongly impacted by the CAA. Programs also may have targeted certain industry sectors for assistance based on their anticipated impact by the CAA and the number of small businesses in that industry sector.

The top ten industry sectors receiving assistance (general and on-site) by SBTCPs in 1997 were:

1. Printing/Graphic Arts
2. Other (not classified)
3. Auto/Body Maintenance, Refinishing, Repair
4. Dry Cleaners/Laundry Services
5. Machine/Equipment Manufacturing & Repair
6. Metal Fabricating/Finishing
7. Government
8. Manufacturing, Miscellaneous
9. Gasoline Distribution (Wholesale/Retail)
10. Furniture Manufacturing/Repair/Wood Finishing.

The top ten industry sectors that received on-site assistance were:

1. Auto/Body Maintenance, Refinishing, Repair
2. Gasoline Distribution (Wholesale/Retail)
3. Dry Cleaning/Laundry Services
4. Other (not classified)
5. Metal Fabricating/Finishing
6. Paints & Painting/Coatings
7. Printing/Graphic Arts
8. Saw Mills/Logging/Wood Products
9. Manufacturing, Miscellaneous
10. Construction/Contractor.

The top ten industry sectors that received assistance from the most programs were:

1. Dry Cleaning/Laundry Services (39 programs)
2. Auto/Body Maintenance, Refinishing, Repair (37 programs)
3. Printing/Graphic Arts (36 programs)
4. Furniture Manufacturing/Repair/Wood Finishing (27 programs)
5. Other (not classified) (26 programs)
6. Electroplating/Chrome Plating (23 programs)
7. Metal Fabricating/Finishing (21 programs)
8. Manufacturing, Miscellaneous (20 programs)
9. Gasoline Distribution (Wholesale/Retail) (19 programs)
10. Sawmills/Logging/Wood Products (18 programs).

As in previous years, industry sectors that received the most overall types of assistance generally received the greatest number of on-site visits. In comments provided by the SBTCPs, the majority indicated that the most notable improvements in compliance were the result of on-site visits.

A list of the industry sectors receiving assistance (by number of programs) may be found in Appendix E-1. This same list also has been reordered by total number of assistance efforts (Appendix E-2) and by on-site assistance efforts (Appendix E-3).

Individual program responses by number of general, on-site, and total assists are shown in Appendix E-4. The fifteen most active programs, with over 1,000 assistance efforts (as tallied by specific industry sectors) were:

1. Kansas
2. California
3. Illinois
4. Texas
5. Colorado
6. Connecticut
7. Tennessee
8. Wisconsin
9. Missouri
10. Georgia
11. New York
12. Iowa
13. Maine
14. Louisiana
15. Oklahoma.

4.2 PRINCIPAL SBO, SBAP, AND CAP ACTIVITIES AND SERVICES

An overview of activities and services provided by the three SBTCP functions is discussed in this section.

4.2.1 SBO/SBAP Activities and Services

An aggregate of the outreach services offered by the SBOs and SBAPs during the 1997 reporting period is presented in Table 4-1. These outreach activities and services are designed to introduce small business people to the available assistance services and to identify common problems and issues to be addressed on a more specific basis.

For 1997, programs could report their outreach statistics either for their SBO and SBAP separately or combined (depending on how they gathered their information). Twenty-six programs reported separate statistics for their SBO and SBAP, and 27 programs reported combined statistics.

TABLE 4-1 SBO/SBAP OUTREACH ACTIVITIES		
ACTIVITY	**# Programs[1]**	**% Programs**
Seminars, workshops, speaking events	51	96
On-site visits	48	91
Brochures, manuals, information packets	48	91
Mailings & correspondence	46	87
Permit & compliance assistance	45	85
Hotline calls	44	83
Meetings	44	83
Information booths	41	77
Pollution prevention assistance	32	60
Newsletters	31	58
Teleconferences	29	55
Regulatory overview	27	51
Media coverage	26	49
Other	16	30

Note 1: Does not include county or regional activities.

The most common outreach activities, offered by at least 85 percent of programs, were:

- Seminars, workshops, speaking events.
- On-site visits.
- Brochures, manuals, information packets.
- Mailings and correspondence.
- Permit and compliance assistance.

The first four activities remain as some of the most common services offered by the programs. Permit and compliance assistance, however, greatly increased from 1996, where 12 programs provided such assistance as compared to 45 programs in 1997.

Detailed information, by program, about the number of occurrences and the number of people reached by each reported SBO/SBAP activity is presented in Appendix E-5. Details of the SBO and SBAP hotlines are shown in Appendix E-6.

4.2.2 Web Pages and Electronic Bulletin Boards

Of particular note is the number of programs that are using World Wide Web (WWW) home pages and Bulletin Board Services (BBSs) to disseminate technical assistance information. Forty-one programs currently are using home pages or BBSs, up from 28 last year. (County/regional air district programs operating their own home pages are counted as one with the state.) One state indicated it plans on launching a home page in 1998. Home pages are far more common than BBSs, with only six programs operating a BBS (also in conjunction with a home page).

The types of information available via these home pages or BBSs are listed in Table 4-2; detailed information on the BBSs and home pages, by program, may be found in Appendix E-7.

TABLE 4-2
INFORMATION AVAILABLE ON SBAP WWW PAGES AND BBS

Type of Information	# Programs	% Programs
Program description	38	72
Contact listings	38	72
Links	34	64
Permitting information	33	62
Regulations	32	60
Guidance documents/fact sheets	32	60
Pollution prevention information	28	53
List of publications	27	51
Permit forms	26	49
Calendar of events	25	47
Policies	23	43
Emissions inventory	13	25
CAP information	12	23
Other	9	17

Internet home pages (and BBSs, which are becoming less common) are efficient mechanisms for SBTCPs to disseminate information to small businesses, as evidenced

by the increasing use of electronic media over the last two years. Because the Internet and BBSs also are practical for information transfer from the federal SBO and SBAP, between SBAPs, and to the small business community, increased access to the Internet and expanded web page content should continue to be pursued by the programs.

4.2.3 CAP Activities and Services

Thirty-nine CAPs indicated they were operational during the 1997 reporting period, 37 of which reported activities. The primary CAP activities, as reported by 28 CAPs, were review of SBTCP documents for compliance and review of SBO/SBAP outreach efforts. This was followed by defining CAP responsibilities (reported by 23 CAPs).

Major activities of the CAPs during the 1997 reporting period are summarized in Table 4-3. A program summary of CAP activities may be found in Appendix E-8.

TABLE 4-3
MAJOR CAP ACTIVITIES

Activity	# Programs	% Programs
Review of SBTCP documents	28	53
Review of SBO/SBAP outreach efforts	28	53
Define CAP responsibilities	23	43
Review/comment on new regulations, policies, etc.	21	40
Appoint staff/elect officers	19	36
Attend training seminars, conferences, etc.	16	30
Meet with small businesses/trade associations	14	26
Other	6	11

CAPs are pursuing many diverse avenues in becoming effective partners in the technical assistance programs. The unique roles and specialized skills of the members make them valuable resources in the development of the SBTCPs. Effective communication among the three components of the programs and among CAPs in all programs will continue to effectively and efficiently define the role of the CAP and

fully maximize the skills of CAP members in assisting small businesses. The value added activities of these CAPs underscore the need for states without operational CAPs to complete the appointment/reappointment process and initiate the CAP function.

4.2.4 SBO/SBAP/CAP Meetings

As shown in Table 4-4, SBTCPs have recognized the importance of meetings among the three functions to ensure effective coordination of efforts and use of resources. Two-thirds of SBOs and SBAPs have scheduled meetings at least quarterly, and almost one-half of programs report scheduled meetings among SBOs, SBAPs, and CAPs at least once a year.

TABLE 4-4
FREQUENCY OF MEETINGS AMONG SBOs, SBAPs, AND CAPs
(number of programs reporting such frequency)

Frequency	SBO & SBAP	SBO & CAP	SBO, SBAP, & CAP	SBAP & CAP
Daily	15			
Weekly	4			
Bi-monthly	6	2	1	1
Monthly	4			
Quarterly	7	8	14	9
Bi-annually	1	3	8	3
Annually	1	1	2	2
Occasionally	5	6	3	6
Other		2	3	2
TOTAL	**43**	**20**	**31**	**23**

Meetings between SBOs and SBAPs were the most common form of contact, occurring in 43 programs (81 percent). A majority of these meetings (38 of 43 programs or 88 percent) were regularly scheduled, with frequencies ranging from daily to annually. The most commonly scheduled frequency of meeting between SBOs and SBAPs, reported for 15 of the 43 programs (35 percent), was daily.

Meetings between SBOs and CAPs were reported for 38 percent of programs (20 of 53). The majority of these meetings, 14 of 20 (70 percent), were regularly scheduled. The most common frequency of meetings between SBOs and CAPs was quarterly, reported for 8 of 20 programs, or 40 percent.

Thirty-one programs (58 percent) reported meetings involving SBOs, SBAPs, and CAPs. Most of these meetings, 28 of 31 (90 percent), were regularly scheduled, and the common frequency was quarterly, reported for 14 of 31 programs (45 percent).

Meetings between SBAPs and CAPs were reported in 23 programs (43 percent). Of these, 17 of 23 (74 percent) were regularly scheduled, and the most common frequency was quarterly, reported for 9 of 23 programs (39 percent).

Detailed information, by program, about meetings between SBTCP functions, is presented in Appendix E-9.

4.3 SBTCP FINANCIAL ASSISTANCE PROGRAMS

Information about financial assistance programs offered to small businesses to address environmental compliance needs is provided in Table 4-5.

TABLE 4-5
FINANCIAL ASSISTANCE PROGRAMS

	#
Programs offering grants/loans	7
Grants/loans offered	10[1]
Programs planning grants/loans	9

Note 1: Some SBTCPs offer more than one financial assistance program.

Seven SBTCPs (13 percent) offered ten financial assistance programs during the 1997 reporting period. Nine SBTCPs have plans to offer financial assistance programs to small businesses in the near future. This is up from 8 financial assistance programs offered by 6 states in 1996. Detailed information about these financial assistance programs is provided in Appendix E-10.

Only 13 percent of SBTCP programs offer some type of financial assistance to help small business with capital expenses associated with pollution prevention or control equipment. Creative financing mechanisms fulfill a need conveyed to programs by small businesses; offering financial assistance was a common recommendation made for improving compliance by SBTCPs themselves. The addition of grant or loan programs planned by nine additional states will be of great benefit to small businesses in these states.

4.4 MINIMIZING DUPLICATION THROUGH COOPERATIVE EFFORTS

Programs reported on the extent to which they utilized existing state/territorial agencies and departments, organizations, and other resources to maximize efficiency and minimize redundancy, as discussed in Section 4.1.1. Programs also provided information on their strategies to exchange information and resources with other SBTCPs, which is summarized in Section 4.4.2.

4.4.1 Cooperative Efforts

Information provided in this section is vital to understanding how some programs with limited budgets and resources are functioning. Generally, programs report that all three components of their SBTCPs recognize the efficiency and value of coordinating their efforts with each other and with other environmental agency departments, state agencies, and organizations. A summary of the number of SBTCP functions that cooperatively manage resources is shown in Table 4-6. Descriptions of programs' cooperative efforts may be found in Appendix E-11.

TABLE 4-6 PROGRAMS THAT REPORT COOPERATIVE EFFORTS FOR SBTCP FUNCTIONS		
	# Programs	% Programs
SBO	42	79
SBAP	48	91
CAP	26	49

Forty-two programs (79 percent) report some level of cooperative effort to enhance the SBO function. The SBO often coordinates information development and dissemination, training, and workshops/seminars with such entities as other state agencies, Chambers of Commerce, trade associations, non-profits, public utilities, and Small Business Development Centers. The overall concerns of small businesses are being taken into account, as many SBOs provide multimedia information, coordinate outreach with non-air programs, or intervene on behalf of a small business with other agencies. Some SBOs also serve in other roles within the state environmental agency.

Forty-eight programs (91 percent) indicate some level of cooperative effort by the SBAP function in order to maximize their programs' effectiveness. Strategies and sources of assistance are quite similar to those used by the SBOs.

Twenty-six CAPs (49 percent) report leveraging resources within their state/territory. While the CAPs, by design, are independent entities, many receive administrative support and technical resources from the state/territory environmental agency, the SBO, or the SBAP.

4.4.2 Minimizing Duplication of Efforts Among SBTCPs

Fifty-two programs (98 percent) report some action to minimize duplication of efforts among SBTCPs. The sharing or exchanging of information among SBTCPs is a practical method for avoiding duplication of effort, thus increasing the overall cost-effectiveness of individual programs. As an example, industry-specific information developed by one program would have wide applicability to other programs involved

with similar industries. Mechanisms that programs employ to avoid duplication of effort are presented in Table 4-7; program details for this topic are found in Appendix E-12.

TABLE 4-7
SBTCP MECHANISMS FOR AVOIDING DUPLICATION

Mechanism	# Programs	% Programs
Communication with other SBTCPs & state agencies	52	98
Contact with other SBTCPs within EPA regions	50	94
Gathering information from electronic sources	46	87
Review of documents from other sources	45	85
Review of EPA documents and/or contact with EPA	45	85
Contacts with state/regional air groups	38	72
Subscribe to SBO or government ombudsman listserve	30	57
Other	15	28

The most common technique (in 98 percent of programs) to avoid duplication of effort was communication and networking with SBTCP and state agency personnel via phone, mailing lists, etc. The second most common method for avoiding duplication was contact with other programs within the same EPA region through conference calls and other means. This technique was utilized during the 1997 reporting period by 50 programs (94 percent).

Gathering information from electronic sources, including use of the Internet for information transfer, continues to be one of the most promising mechanisms for avoiding duplication of effort among programs. Use of this method greatly increased in 1997 and was reported by 46 programs, up from 18 in 1996. This parallels the rise in the number of web pages available, as previously noted. Posting of information from the federal SBO and SBAP, other private and university sources, and state programs facilitate efficient use of resources and would encompass all of the mechanisms to avoid duplication. Additionally, 30 programs reported subscribing to applicable listserves. (A listserve is a program that allows users to mass-distribute

electronic mail messages. 1997 was the first year this reporting category was solicited.)

4.5 SBTCP COMPLIANCE WITH SECTION 507(d)(2)

Section 507(d)(2) of the CAA requires EPA's SBO to periodically report to Congress on SBTCP actions to follow the intent of the provisions of the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act. EPA's SBO has conducted a number of significant outreach actions toward assisting the SBTCPs in this effort.

Key EPA SBO outreach activities under the CAA Section 507(b) pursuant to these statutes include:

- Conducted educational activities at the EPA SBO Regional Liaison Conference, Arlington, VA, August 1997.
- Provided information on statutes at the 1997 National/State SBO/SBAP Conference in Charleston, SC.
- Responded to telephone hotline inquiries in regard to the three statutes.
- Distributed copies of the three statutes by request to state contacts.
- Provided states with copies of the 1996 Small Business Regulatory Enforcement Fairness Act (SBREFA), which strengthens and amends the Regulatory Fairness Act.
- Offered information on the three statutes on the small business environmental home page.

4.5.1 SBTCP Activities Associated with the Paperwork Reduction Act

Forty-seven programs (89 percent) reported specific activities associated with the intent of the Paperwork Reduction Act, up from 32 programs in 1996. This Act was designed to minimize the burden and maximize the practical utility and public benefit associated with the collection of information by or for a federal agency.

The two most common action taken to follow the intent of the provisions of this act were development of concise, easy-to-read summary documents (77 percent of programs) and receiving/providing information electronically (72 percent of programs). Overall, these actions show an increasing number of SBTCPs have continued to take significant steps during the 1997 reporting period in following the intent of the provisions of the Paperwork Reduction Act.

Actions taken by SBTCPs in following the intent of the provisions of the Paperwork Reduction Act are listed in Table 4-8 and are detailed, by program, in Appendix E-13.

TABLE 4-8
SBTCP ACTIVITIES TO FOLLOW THE INTENT OF THE PAPERWORK REDUCTION ACT

Activity	# Programs	% Programs
Producing concise, easy-to-read summary documents	41	77
Receiving/providing documents electronically	38	72
Reviewing documents for compliance	37	70
Using general, industry-specific permits	30	57
Using simplified/consolidated permits/forms	30	57
Increasing exemptions for "insignificant" activities	20	38

4.5.2 SBTCP Activities Associated with the Regulatory Flexibility Act

Forty-seven programs (89 percent) reported activities to follow the intent of the provisions of the Regulatory Flexibility Act during 1997. This is an increase from 27 programs in 1996. The Regulatory Flexibility Act requires that when a number of regulations will have a significant economic impact on a substantial number of small entities, "a regulatory analysis must be performed to explore options for minimizing those impacts." Those actions most often implemented are prioritized in Table 4-9.

TABLE 4-9 SBTCP ACTIVITIES TO FOLLOW THE INTENT OF THE REGULATORY FLEXIBILITY ACT		
Activity	**# Programs**	**% Programs**
Reviewing documents for compliance	38	72
Reviewing/commenting on new air regulations	33	63
Using simplified/consolidated permits/forms	28	53
Implementing an amnesty program	23	43
Increasing exemptions for "insignificant" actions	22	42
Other	2	4

SBTCPs have played a major role in ensuring awareness of the effects of regulatory requirements on small businesses as well as promoting environmental compliance in the small business community. SBTCP personnel made significant strides in promoting the effects of legislation/regulations on small businesses to regulatory agencies through their role as mediators between these two groups. The primary activity reported by programs in following the intent of the Regulatory Flexibility Act (38 programs, or 72 percent) was the review of SBTCP documents for compliance. SBTCPs continue to be effective advocates of the small business perspective and have helped negotiate flexible application of regulatory requirements that provided great benefits to small businesses. Actions taken by SBTCPs in response to the Regulatory Flexibility Act, by program, may be found in Appendix E-14.

4.5.3 SBTCP Activities Associated with the Equal Access to Justice Act

Forty programs (75 percent) reported specific activities to follow the intent of the provisions of the Equal Access to Justice Act, up from 18 programs in 1996. The purpose of this Act is to provide certain parties who prevail over the Federal government with covered litigation in an award of attorneys' fees and other expenses under appropriate circumstances. Specific actions include the routine review of SBTCP documents for compliance (the most common activity, conducted by 34 programs), the provision of technical assistance to groups aggrieved by permit actions of a regulatory agency, and the establishment of pro bono legal services.

SBTCP actions to follow the intent of the provisions of the Equal Access to Justice Act are shown in Table 4-10 and detailed, by program, in Appendix E-15.

TABLE 4-10
SBTCP ACTIVITIES TO FOLLOW THE INTENT OF THE EQUAL ACCESS TO JUSTICE ACT

Activity	# Programs	% Programs
Reviewing of documents for compliance	34	64
Providing technical assistance for groups aggrieved by regulatory actions	17	32
Offering pro bono legal services	1	2
Other	3	6

5.0 PROGRAM EFFECTIVENESS

External assessments of the SBTCPs' program effectiveness are reviewed in this section. Comments regarding the SBTCP are discussed in Section 5.1. Concerns or other inquiries received by SBTCPs and resolution strategies are presented in Section 5.2. Finally, program highlights and accomplishments are found in Section 5.3.

5.1 COMMENTS RECEIVED ON SBTCPs

Thirty-eight programs (72 percent) reported that comments were received regarding their programs. Comments were overwhelmingly positive, generally expressing appreciation for the availability of services and the way in which these services were provided. A detailed synopsis of comments received by the programs is presented in Appendix F-1.

Common themes repeated by small business clients of numerous programs include:

- Pleasant surprise to get knowledgeable, responsive, and pleasant service from a government agency.
- Expressions that SBTCP services filled an existing need in the small business community for personalized guidance through the many regulatory processes involved in compliance. Many small businesses cited specific SBO/SBAP staff members for their dedicated and professional service.
- Relocating and start-up businesses found SBTCP services especially helpful.

5.2 CONCERNS/INQUIRIES RECEIVED AND RESOLUTION STRATEGIES EMPLOYED

SBTCP staff members fill an important role as facilitator or mediator between small business owners/operators and regulatory agencies, enhancing communication to promote understanding and sensitivity on both sides. Based on information reported, most problems seem to be resolved when businesses have someone to turn to for non-regulatory assistance, advice, and effective liaison with regulatory agencies. Information was requested about concerns or inquiries raised by small business representatives and how these issues were resolved. Lessons learned by one program can be shared with other programs, which thereby can benefit from these experiences.

Twenty-five programs (47 percent) provided examples of inquiries received and resolution strategies employed. Major themes of the issues reported have not changed significantly from the last reporting period.

- Lengthy amount of time for permit approval.
- A need for improved communication between businesses and regulatory agencies.
- Requests for simplified forms and procedures.
- Confusion by small business as to which regulations applied to them, how these regulations affected their specific operations, and how they can be met in a time- and cost-effective manner.
- The need for specialized one-on-one assistance for identifying and completing paperwork associated with regulatory requirements and submitting it on schedule.
- The need for flexibility in applying regulations to small businesses (e.g., the use of general permits, amnesty programs, exemptions).
- Overwhelming number of regulations.
- Desire for financing assistance programs.

Resolution strategies (for the above issues) similar to those noted last year were employed and typically involved SBTCP personnel:

- Providing "plain English" explanations of regulatory requirements.
- Giving one-on-one guidance through the paper work processes.
- Facilitating communication about flexibility and compliance assistance issues between businesses and regulatory agencies.
- Investigating, developing, or institutionalizing financial assistance programs.
- Working with regulatory personnel to ensure consistent answers to inquiries and consistent application of enforcement actions.

Specific issues addressed by the SBTCPs and resolution strategies taken to address small business concerns are presented in Appendix F-2.

5.3 PROGRAM HIGHLIGHTS AND ACCOMPLISHMENTS

Forty-one SBTCPs (77 percent) reported on important accomplishments, awards, and recognitions for their work with the small business community.

The SBTCPs continue to facilitate communication and improve trust between the regulatory agencies and small businesses. Many programs have forged strong partnerships with such groups as trade associations, small business development centers, and small business associations to broaden outreach efforts to the small business community. Many states also have developed industry-specific initiatives that include compliance manuals, workshops, and on-site visits.

In this section, key accomplishments are highlighted based on the frequency in which they were mentioned. An overview of program accomplishments and highlights for 1997 are provided in Appendix F-3.

1. Forging partnerships with other organizations and agencies was mentioned by 30 programs (57 percent) as being a significant accomplishment.

    - Florida's SBAP is actively developing partnerships with Small Business Development Centers to expand outreach efforts to as many small businesses, new or established, about all environmental regulatory requirements.

    - Kansas' SBO developed an interagency workgroup comprised of the Small Business Association, Small Business Development Centers, the Kansas Department of Commerce, the Kansas Department of Human Resources, the Kansas Department on Aging, the Secretary of State, and other agencies that work with businesses.

    - Maryland's SBAP cooperated in developing the Maryland Green Printers Initiative with the Printing Industries of Maryland , EPA Region III, the Environmental Project at Catonsville Community College, and Maryland Department of the Environment's P2 Program.

    - Over a two year period in Virginia, a committee composed of the Department of Environmental Quality central office staff from permit assistance and the small business/air toxics sections, DEQ regional permitting staff, and representatives from several major furniture manufacturers and the American Furniture Manufacturers' Association developed a model Title V permit.

2. Improved synergy between the regulatory agency and small business was noted by 26 programs (49 percent).

   - The Texas SBAP expanded its EnviroMentor program, a volunteer effort of environmental professionals coordinated through the SBAP. To date, the 50+ volunteers have saved businesses nearly 16K through 18 site visits.

   - The California ombudsman's office responded to over 300 help-line calls and over 900 e-mail inquiries. The office routinely investigated and resolved stakeholder concerns. Customer service is emphasized, tracking a particular individual's request to its conclusion and ensuring the individual is satisfied.

   - Connecticut's CAP and SBAP had great success in working with the metal finishing association on how to achieve compliance. Contacts between CAP members and industry were key in establishing a relationship for meaningful dialogue.

   - Georgia's SBAP mailed a dry cleaning brochure to 1,000 facilities requesting perc usage data, offering videos for training, and notifying them of upcoming compliance inspections. The SBAP received over 200 requests for videos and information of perc use. The SBAP also mailed letters to hard chromium users reminding them that the notification of compliance status form was due on 2/24/97. All hard chromium users responded and are in compliance.

3. Sponsorship of or making presentations at workshops and forums was highlighted by 20 programs (38 percent).

   - The Illinois SBAP coordinated degreaser workshops, dry cleaner town hall meetings, a Green and Profitable Printing teleconference, a dry cleaner survey of compliance assistance effectiveness, and the Southern Illinois Environmental Managers' Association annual conference.

   - Michigan's SBAP presented a series of New Source Review (Permit to Install) workshops focusing on applicability and how to fill out the Permit to Install application. The workshops were developed and delivered by SBAP staff.

   - Pennsylvania's CAP chairperson represented small business perspectives on air quality issues, including CAP activities, on these occasions: testified before the U.S. Senate in April 1997, interviewed by CBS Evening News in June 1997, and testified before the U.S. House of Representatives in October 1997.

4. Sixteen programs (30 percent) were pleased with the publication of various documents.

   - Colorado sent out 900 dry cleaner books and letters to further assist dry cleaners understand requirements. Helped create guidance documents for chrome plating with information for inspectors, permit writers, and sources.

   - Iowa's program published the "Air Emissions Guide for Chromium Electroplaters," "Resource Guide to Small Business Air Emissions Assistance," and "112(r) Applicability Guide."

   - Minnesota's SBAP coordinated the development of a comprehensive multimedia guide for automotive repair and body shops. The "Environmental Guide for Automotive Service Providers" contains fact sheets and self-audit checklists on regulatory requirements and P2 opportunities for the subject business sector.

   - Utah developed forms and documents for small source permitting, including the registration form, a brochure explaining the new rule, and emission estimate guides for criteria pollutants and hazardous air pollutants. These guidance documents have been developed for printers, wood furniture finishers and refinishers, and auto body.

5. Nine programs (17 percent) reported work on multimedia projects or moving their whole assistance program to multimedia leadership.

   - Kentucky's program initiated meetings with the Natural Resources and Environmental Protection Cabinet to evaluate the program and emphasize the need for a multimedia small business assistance program.

   - Maine helped to develop and implement the "Environmental Leader" program, a multimedia compliance assistance program for gasoline stations and associated automotive repair facilities.

   - Nebraska's Department of Environmental Quality is very proactive in developing a balanced approach to compliance assistance and enforcement. The agency has provided the Public Advocate with technical assistance in all areas. This assistance has made the SBAP a true multimedia program.

   - North Carolina's newly established Environmental Permit Information Center provides multimedia information on permit requirements, key contacts for specific permitting programs, and other advice to clients.

6.0 COMPLIANCE ASSURANCE ISSUES

EPA's Office of Enforcement and Compliance Assurance (OECA) requested information on the effectiveness of the SBTCPs in providing compliance assistance to small businesses. Common compliance problems are discussed in Section 6.1, improvements in regulatory understanding and compliance are detailed in Section 6.2, and recommendations to facilitate compliance are outlined in Section 6.3. Program confidentiality issues are outlined in Section 6.4.

6.1 COMMON COMPLIANCE PROBLEMS

Fifty-one SBTCPs (96 percent) provided insight on the types of compliance issues addressed during the course of providing technical assistance to small businesses. Common compliance problems, listed by decreasing occurrence for 1997, are shown in Table 6-1 and are compared with responses from 1996 and 1995; responses for 1997 are detailed, by program, in Appendix G-1. (Responses from the ten county/air board programs that also answered this question are included in the appendix.)

TABLE 6-1 COMMON COMPLIANCE PROBLEMS						
	1997		1996		1995	
Compliance Problem	# Programs	% Programs	# Programs	% Programs	# Programs	% Programs
Not understanding regulatory requirements	49	92	28	53	22	42
Uncertain how to determine emission inventories/lack of technical expertise	45	85	12	23	5	9
Uncertain how to complete forms/complicated paperwork	44	83	10	19	4	8
Incomplete recordkeeping	42	81	16	30	8	15
Fear of arbitrary regulatory enforcement/regulatory agency	42	81	6	11	3	6
Operating without a permit	39	74	26	49	19	36
Uncertain of permitting requirements	37	70	14	26	17	32
Financing for pollution control requirements	31	58	10	19	5	9
Improper storage/disposal of hazardous waste	29	55	7	13	4	8
Operating outside NSPS or MACT	23	43	10	19	4	8
Failure to use or finding proper equipment/technology to comply with applicable standards	12	23	6	11		
Other	5	9				

Examples of less frequently-cited compliance concerns as identified by small businesses and programs are shown below.

- Language barriers (non-English).
- Failure to understand how to comply when two regulations from the same or different agencies conflict.
- Failure to understand the universal waste regulations.
- Failure to accurately complete the Toxics Release Inventory Report.
- Lack of P2 knowledge.

Compliance issues have remained consistent from year to year. Identifying key problems and gaps in understanding by the small businesses have helped the SBTCPs to best target their assistance efforts.

6.2 IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE

Programs reported on improvements in understanding and awareness of regulatory requirements, behavioral changes, and environmental improvements (if tracked) that they feel have resulted from their compliance assistance activities.

Fifty programs (94 percent) provided insight as to improvements in regulatory understanding and compliance. The most common responses, listed by number and percentage of programs for 1997, 1996 , and 1995, are provided in Table 6-2 and are detailed, by program for 1997, in Appendix G-2. (The appendix also includes responses from the ten county/air board programs that also responded.)

TABLE 6-2
IMPROVEMENTS IN REGULATORY UNDERSTANDING

	1997		1996		1995	
Response	# Programs	% Programs	# Programs	% Programs	# Programs	% Programs
More open communication between sources and agencies	46	87	30	57	26	49
Greater understanding/awareness of regulations	46	87	18	34	20	38
Increased compliance	43	81	20	38	23	43
Reduced apprehension of regulatory agencies and environmental compliance	39	74	12	23	18	34
Better recordkeeping	37	70	4	8	5	9
Improvements in pollution prevention practices	36	68	10	19	5	9
Increased registration and permitting of existing sources	35	66	11	21	5	9
Other	3	6				

Generally, SBTCPs report that businesses want to comply with environmental regulations; however, they may be afraid to ask for assistance. When a non-threatening assistance program, such as the SBTCP, is available, small businesses are most anxious to take advantage of the services. The SBTCPs have offered important one-on-one contacts, which have provided valuable information to those who were previously unaware of their compliance requirements. Such information included: the need to have operating permits and how to obtain and complete them; the need to maintain records; and information on available compliance options such as reformulation, pollution prevention, or control equipment.

SBTCPs help small business understand how the regulations apply to their operations/facilities and offer information on the available alternatives to achieve voluntary compliance. Two of the most common compliance problems mentioned by small businesses, "not understanding regulatory requirements", and "uncertain how to determine emission inventories/lack of technical expertise", were represented positively by facilities as compliments to program effectiveness, with programs reporting "greater understanding and awareness of the regulations," and "improved communication between sources and agencies." This indicates that the SBTCPs are working to understand the small business community and provide quality service where it is most needed.

All areas attributed to improvements in regulatory understanding showed strong increases by doubling or tripling in the number of programs reporting improvements from 1996 to 1997.

Texas devised a system to measure improvements in compliance and reported specific improvements in compliance as a result of their outreach efforts to specific industry sectors and reported the following results:

- Foundries - 41 percent increase in air issues (to 87 percent) and 18 percent increase in waste issues (to 92 percent).
- Dry Cleaners - 18 percent increase in air issues (to 87 percent) and 18 percent increase in waste issues (to 92 percent).
- Auto Body - 13 percent increase in waste issues (to 96 percent).

Texas notes that the responses from callers and from questions at workshops indicate an improving level of environmental knowledge. Assistance is requested concerning application of various rules rather than, "rules, what rules?" questions.

In general, programs are reporting an increased level of trust and awareness by the small business community. Their knowledge of environmental issues and regulations is steadily improving, and the inquiries made to the programs are becoming more sophisticated.

6.3 RECOMMENDED CHANGES TO FACILITATE SMALL BUSINESS COMPLIANCE WITH THE CAA

Recommendations made by 42 SBTCPs for changes, at the state or federal level, to help small businesses comply with the CAA are summarized in Table 6-3. SBTCP staff members are uniquely qualified to make such recommendations, since they address current CAA compliance problems encountered by small business and attempt to provide effective solutions. Specific program responses may be found in Appendix G-3.

TABLE 6-3 1997 SBTCP RECOMMENDATIONS FOR IMPROVING COMPLIANCE		
Recommendation	**# Programs**	**% Programs**
Allow flexibility/simplification in applying regulations to small businesses	15	28
Multimedia pollution control and compliance assistance	14	26
Increased funding/continued adequate funding for SBTCPs	14	26
Mechanisms for financing pollution control equipment	11	21
Generic outreach and training materials	8	15
Expand/facilitate effective communication between state and federal agencies	7	13
Simplify paperwork/reporting requirements	7	13

Forty-two programs (79 percent) provided at least one recommendation for changes to improve small business compliance with the CAA. Priority of responses for 1997 parallel those of 1996.

Allowing flexibility and simplification in applying regulations to small businesses was mentioned by 15 programs (28 percent) as being the prime recommendation for improving compliance. Another common recommendation stressed by 14 programs (26 percent) involves the expansion of technical assistance into a multimedia effort, addressing small business concerns about groundwater, soil, and hazardous waste issues. Many states have already expanded their programs to encompass multimedia assistance or are planning to do so in response to small business requests.

The third most common recommendation, also mentioned by 14 programs, was for continued and increased funding for the state SBTCPs. As previously noted, a number of states operate with limited budgets and staffs. The personalized approach to technical and compliance assistance has been shown to be effective in reaching the small business community, and 26 percent of state programs believe that adequate financial resources are vital to continued and expanding high quality service.

6.4 PROGRAM CONFIDENTIALITY AND CONFLICT OF INTEREST

In early 1995, EPA's SBO worked with the SBTCPs and EPA's Office of Enforcement and Compliance Assurance to reach an agreement regarding the confidentiality of assistance provided to businesses via the SBTCP.

Programs were asked how they avoid conflicts of interest (COI) and maintain confidentiality, particularly in those cases where the SBAP is located within the regulatory agency.

Forty-five programs (85 percent) reported no problems with COI or confidentiality issues regardless of whether a confidentiality policy is in place. Seven programs did not respond to the question, and only one program indicated it is working to avoid the perception of COI.

Program structures range from guaranty of confidentiality (more common) to providing no confidentiality. For example, assistance programs may be housed in non-regulatory departments, or a program may refer a business in need of technical assistance to such a provider that will guaranty confidentiality. Most programs provide for confidentiality of trade secrets. Many programs have policies that protect small businesses from penalties if violations are discovered during the course of their receiving technical assistance. Program responses to the issue of COI and confidentiality may be found in Appendix G-4.

The following example responses reflect the range of COI issues and resolutions (from having an established confidentiality policy to having no such policy).

- In Idaho, this hasn't been a big problem (at least it hasn't been expressed). The agency, as a whole, is working on showing businesses that we are there to assist them in compliance. We are taking a more proactive approach to problem solving. Confidentiality isn't something we have tried to maintain. We are more concerned with trust, so we don't guarantee something we can't.

- Louisiana law prohibits the SBAP from operating in a confidential manner. We do not voluntarily give any information regarding small business activity. Over the last five years, the program has developed a reputation of trust among the small business community, so that the lack of professed confidentiality has not been a drawback to the program.

- New Hampshire's SBO/SBAP offers small businesses several options when dealing with confidentiality. State laws have been passed, which grant businesses audit privilege for self-audits and confidentiality when accessing assistance programs. In addition, businesses can take advantage of the EPA Small Business Compliance Incentives Policy for enforcement protection.

- Nevada's SBAP operates separately and independently from the enforcement group of the agency. The Department of Environmental Protection director has given strong assurances that the confidentiality of all assistance programs shall be respected.

APPENDIX A

1997 ANNUAL REPORTING FORM

STATE SMALL BUSINESS STATIONARY SOURCE TECHNICAL AND ENVIRONMENTAL COMPLIANCE ASSISTANCE PROGRAM (SBTCP)

ANNUAL REPORTING FORM FOR THE PERIOD 1/1/97 TO 12/31/97

OMB NO.: 2060-0337 EXPIRATION DATE: 7/31/98

INSTRUCTIONS FOR COMPLETING THIS FORM

Enclosed is a blank copy of the Annual Reporting Form for the State Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP). The questions are the same as those asked last year, but the format in which you can answer certain questions has been adjusted to mirror the current reporting format in the Report to Congress and to make reporting easier for you. To streamline the reporting, this Form is designed to collect standardized information on each of the three components of the SBTCP, listed below, in a single document.

- Small Business Ombudsman (SBO)
- Small Business Assistance Program (SBAP)
- Compliance Advisory Panel (CAP)

The period of time covered by this report is January through December 1997.

For your convenience, electronic copies of the form are provided on the enclosed disk in WordPerfect (SBTCP97.WP) and Microsoft Word (SBTCP97.DOC). Information previously requested in Table 3-1 is not being requested this year.

Please record your complete answers to each question on the Reporting Form. Please do not answer questions by referring to attached documents or previous SBTCP reports. **Then, please return the disk and a completed hardcopy of the Reporting Form using the enclosed, pre-addressed mailer.**

If this mailer is missing, please return the disk and a completed hardcopy to:

Ms. Karen V. Brown
Small Business Ombudsman
U.S. Environmental Protection Agency (2131)
401 M Street, SW
Waterside Mall, Room 3423
Washington, D.C. 20460

ATTN: SBTCP Annual Report

If you use your own mailer, please include on the mailer the words, "Electronic Media Enclosed."

Completed forms are due by February 15, 1998.

If you have any comments or questions regarding this form, please contact the U.S. EPA Small Business Ombudsman (EPA SBO) at the numbers listed below. **Please note that the telephone and facsimile numbers are new!** The SBO can be reached Monday through Friday from 8:30 a.m. to 5:00 p.m. (EST). After these hours, messages can be left on an answering machine, which is connected to the toll-free 800 number.

(202) 260-0490 (Telephone)
(800) 368-5888 (Toll-free Hotline)
(202) 401-2302 (Facsimile)

WHY ARE WE REQUESTING THIS FORM?

As part of the Clean Air Act CAA as amended in 1990, the U.S. Congress included, as Section 507, the requirement that each state establish a Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP) to assist small businesses in complying with this Act.

As part of its normal reporting requirements to Congress, EPA will also provide the Congress with a report on the SBTCP program, including overall effectiveness, difficulties encountered, and the degree and severity of enforcement. EPA has internally delegated responsibility for completion of this report to its Small Business Ombudsman (EPA SBO).

The EPA SBO intends to use the information contained in this Form, as reported by the states, to prepare the Report to Congress, including the need for such technical assistance programs and how they should be changed, if necessary. The goal of this Form is to standardize the information reported by the state SBTCPs.

Any suggestions or recommendations to improve this reporting format would be appreciated. Please feel free to contact EPA's SBO to discuss any recommendations using the address and telephone numbers listed on page 1. Please note that the Reporting Form is being revised for the 1998 reporting year and will go through the OMB review process.

SUGGESTIONS FOR COMPLETING THIS FORM

- Gathering information for this report is definitely a team effort! You may wish to provide hard copies of this form to key contacts from the SBO, the SBAP, and the CAP, and indicate who will be responsible for the various parts of the report. Once all information is collected, one person should take responsibility for completing and submitting this form (most likely the SBO).
- We are looking to collect objective information on each state SBTCP. This report is not meant to be an evaluation of any facet of your program.
- We are seeking information you should be already collecting for you own purposes. We are not asking you to create information you do not have. If a question asks for information you do not have, please provide a brief explanation as to why the information is not available.
- You may wish to refer to last year's Report to Congress and the information you provided on your Reporting Form last year when completing this year's Reporting Form.
- For future reports, you are encouraged to continually gather your statistics during the reporting period. Based on the information requested in this Form, you may need to revise the types of statistics you track for your SBTCP for subsequent years.

SECTION 1
SOURCE OF THE INFORMATION

This section is designed to collect standardized information about the state SBTCPs completing this Form, and whom to contact if we should have any questions.

1.1 Name of state or territory for which this report is being submitted.

1.2 Period of time (calendar year) covered by this report.

1997

1.3 Who should be contacted (primary and alternate contacts) if there are any questions regarding the information contained in this Form?

The most typical answer for this question will be the CAP Chairperson or the state Small Business Ombudsman. For the question "Relationship to SBTCP", we would like to know the relationship of that person to the SBTCP program (i.e., CAP Chairperson, SBO, etc.). Be sure to include the area code for the telephone and facsimile numbers. Also include a telephone extension if appropriate.

	PRIMARY CONTACT	ALTERNATE CONTACT
Name		
Title		
Relationship to SBTCP		
Organization		
Address		
Address		
City, State, Zip		
Telephone Number		
Facsimile Number		
E-mail		

SECTION 2
STATUS, BUDGETS, STAFFING, ORGANIZATION

This section is designed to collect four types of standardized information about your state's SBTCP: Status, Budgets, Staffing Levels, and Organization. The information you provided in last year's report will be helpful in answering the questions in this section.

STATUS

2.1 When was your SBTCP established?

Please note that in Question 2.2, we are asking when each component of your SBTCP actually began to operate (provide services), which may be different.

SBTCP Component	Month and Year of Establishment
SBO	
SBAP	
CAP	

2.2 When did the SBTCP begin to provide operations (month and year)?

To be consistent, for the SBO, indicate the effective date (month/year) of appointment; for the SBAP, indicate the date (month/year) it began providing assistance to small businesses; and for the CAP, indicate the date (month/year) of the first meeting -- even if not all members of the CAP were appointed by the time of the first meeting.

SBTCP Component	Month and Year Operations Began
SBO	
SBAP	
CAP	

BUDGETS

2.3 Please provide summary information on the funding for each component of your state's SBTCP (for the period January through December 1997). Please indicate the source of funding.

For example, sources of funding might include: Title V fees, specific appropriation of state funds, the operating budgets of existing programs, or some combination.

These budgets should include direct salaries, fringe benefits, materials & supplies, etc. To keep it simple, please round your budgets to the nearest $5,000.

	1997 BUDGET ($)	SOURCE OF FUNDING (please describe)
SBO		
SBAP		
CAP		
TOTAL		

2.4 What was the SBTCP's budget in 1996? What is the expected SBTCP budget during the next reporting period (January through December 1998)?

As with the previous question, please round all numbers to the nearest $5,000. If these programs did not exist (or were not active) in 1996, please complete this question with such words as, "inactive" or "did not exist."

	1996 BUDGET ($)	1998 PROJECTED BUDGET ($)
SBO		
SBAP		
CAP		
TOTAL		

2.5 Briefly describe any significant changes (more than 10%) in the level of funding between the 1996, 1997, and 1998 annual budget periods.

For example, a previous period may have seen a high level of fines that were credited to the SBTCP program; perhaps Title V revenues were lower than projected; or state appropriations may have been reduced or eliminated.

STAFFING

With these questions, we are interested in knowing how many people are supporting each component of your state's SBTCP.

2.6 How many people, measured as full-time equivalents (FTEs), support the SBO function?

Please complete this question for the staffing levels that are current as of December 1997. An FTE is considered to work 40 hours/week. For example, 2 people working 20 hours/week would be equivalent to 1 FTE. It is possible that the SBO has other responsibilities and does not perform this function on a full time basis. For example, if they perform this function approximately 20 hours/week (or 50% of their time), this would be equivalent to an 0.5 FTE.

SBO Function	Number of FTEs
SBO	
Other staff	
TOTAL STAFF	

2.7 How many people, measured as full-time equivalents (FTEs), support the SBAP function? How many of these people are paid or serve as (unpaid) volunteers? How many of these people would be considered retired engineers?

Please complete this question for the staffing levels that are current as of December 1997. Use the same definition for an FTE as discussed in Question 2.6. We are interested in knowing if the states are utilizing unpaid volunteers as well as "retired engineer" programs (or their equivalent) to support the SBAPs.

SBAP Staff	Number of FTEs
Paid	
Unpaid Volunteers	
Retired Engineers	
TOTAL STAFF	

2.8 How many people are currently serving on your CAP?

Please answer this question by indicating how many people have been appointed to your CAP as of December 1997. Please indicate the affiliation of each CAP member (i.e., small business, state regulatory agency, general public, etc.)

If appropriate, please indicate the number of people who have not been appointed to your CAP as of December 1997.

When complete, this table should list a total of at least 7 people (including appointed and not yet appointed).

AFFILIATION	NUMBER OF PEOPLE ON CAP
Owner (or representative) of small business	
State regulatory agency	
General public	
Not yet appointed	
Other (please specify)	

ORGANIZATION

2.9 Please briefly describe where each component of your SBTCP is located/organized.

Please indicate if the component is located in a state regulatory agency, another state agency, a university, etc. For example, in some states, the SBAP is located within the state regulatory agency. If so, please list the name of the agency and the appropriate department, division, etc. (for example: Department of Environmental Protection, Bureau of Waste Management). If your state has subcontracted your SBAP to an outside company, please complete Question 2.11. Generally, the CAP is independent and is located outside of all agencies, with each individual appointed as defined in Section 507.

SBTCP COMPONENT	BRIEF DESCRIPTION OF ADMINISTRATIVE LOCATION
SBO	
SBAP	
CAP	

2.10 Has management of the SBAP been contracted to an outside company?

If YES, please complete Question 2.11.

YES	
NO	

2.11 Who is the outside company that is operating your SBAP?

For the section, "Budget During the Current Reporting Period", please complete for the time period January through December 1997. Please indicate (or estimate) the budget to the nearest $5,000.

Company	
Address	
Address	
City, State, Zip	
Telephone Number	
Facsimile Number	
Project Manager (or principal point of contact)	
1997 Budget	
Term of Contract	

SECTION 3
SERVICES PROVIDED/ACTIVITIES CONDUCTED

This section is designed to collect standardized information about the type and level of services provided by the three components of the state's SBTCP program: SBO, SBAP, and CAP. As you complete this section, please seek assistance from the SBAP (primarily) and CAP.

3.1 Does your SBTCP have one or more information hotlines? Please enter the appropriate telephone numbers into the chart below to indicate your response to the following questions.

- **Does your SBO/SBAP have an information hotline number? (If not, write none.)**
- **Is the number toll-free?**
- **If toll-free, is the number accessible nationally or in-state only?**

SBTCP Component	Toll-free Hotline		Not Toll-free
	National Access	In-state Only Access	
SBO			
SBAP			

3.2 Briefly describe the assistance services of your SBO and SBAP.

This year, we are asking for this information in a different format from previous years to simplify and streamline the reporting process. (This question combines the old questions 3.2 and 3.3.) We are interested in compiling statistics on the types of assistances and number of people/businesses reached through a variety of assistance services by the SBO and SBAP.

A list of activities is sufficient, however, the number of occurrences of these activities when available, is preferred (e.g., 12 speaking engagements reaching 160 people; 3 training seminars reaching 72 participants; preparation and distribution of 8 industry-specific brochures, 500 copies of each).

To help you in completing this question, the following table is provided in which you can list the number of occurrences and the number of people reached, if those statistics are available. If you only track whether these activities occurred (and not the specific number of occurrences), please simply indicate "YES" in the "NUMBER OF SERVICES PROVIDED" column.
If you tally statistics separately for your SBO and SBAP, please complete Table A, which follows.
If you combine your statistics for your SBO and SBAP, please complete Table B.

For help in filling out the table, please refer to the following partial sample of Table A.

NOTE: If available, please include a list of documents, that were prepared and distributed by your SBTCP during the 1997 reporting period.

Sample Table A (partial) to be used when SBO and SBAP statistics are tallied separately.

TABLE A (SAMPLE)	Number of Services Provided / Number of Persons or Businesses Reached													
	Hotline Calls		On-site Visits		Seminars, Workshops, Speaking Events		Meetings		Brochures, Manuals, Information Packets		Newsletters		Mailings and Correspondence	
SBO	111	111			26	423	20	75	6	2,000			100	100
SBAP	236	236	47	47	17	938	12	60	8	40,000	4	60,000	250	250
Total	347	347	47	47	43	1361	32	135	14	42,000	4	60,000	350	350

TABLE A -- USE THIS TABLE IF SBO AND SBAP ACTIVITIES ARE TALLIED SEPARATELY

TABLE A	Number of Services Provided / Number of Persons or Businesses Reached													
	Hotline Calls		On-site Visits		Seminars, Workshops, Speaking Events		Meetings		Brochures, Manuals, Information Packets		Newsletters		Mailings and Correspondence	
SBO														
SBAP														
Total														

TABLE A	Number of Services Provided / Number of Persons or Businesses Reached													
	P2 Assistance		Information Booths		Teleconferences		Press Releases and Media Coverage		Regulatory Overview		Permit and Compliance Assistance		Other*	
SBO														
SBAP														
Total														

TABLE A	*Other - Please list.
SBO	
SBAP	

TABLE B -- USE THIS TABLE IF SBO AND SBAP ACTIVITIES ARE COMBINED

TABLE B	Number of Services Provided / Number of Persons or Businesses Reached													
	Hotline Calls		On-site Visits		Seminars, Workshops, Speaking Events		Meetings		Brochures, Manuals, Information Packets		Newsletters		Mailings and Correspondence	
Combined Program														

TABLE B	Number of Services Provided / Number of Persons or Businesses Reached													
	P2 Assistance		Information Booths		Teleconferences		Press Releases and Media Coverage		Regulatory Overview		Permit and Compliance Assistance		Other*	
Combined Program														

TABLE B	*Other - Please list.
Combined Program	

3.5 Do SBTCP services include an electronic bulletin board or Internet home page?

YES	
NO	

If YES, what is the address of the bulletin board or home page?

If your SBAP has an electronic bulletin board or home page, please indicate, if available, its level of usage (i.e., how many times was it accessed during the 1997 reporting period)?

Please list the information that is accessible through this bulletin board or home page.

To make it easy to complete this question, the table below lists some possibilities. Please add additional items as appropriate.

Information Available Through the Bulletin Board or Home Page	Please check all appropriate boxes
Program description	
Contact listings	
Copies of regulations	
Permitting information	
Permit forms	
Emission inventory	
Policies	
Guidance documents, fact sheets, etc.	
Information on P2 options	
List of available publications	
CAP information	
Calendar of events	
Links to related sites	
Other (please list)	

Was it helpful to its users?

With this question, we are asking if you have received ANY comments from the bulletin board or homepage users. Please indicate if any component of the SBTCP is soliciting feedback from users as to information/topics they would like to see on the bulletin board or homepage.

COMPLIANCE ADVISORY PANEL

3.6 What were the major activities of the CAP during this reporting period?

To make it easy to complete this question, the table below lists some possibilities. Please add additional items as appropriate.

Major CAP Activities	Please check all appropriate boxes
Review of documents for readability and/or content	
Appointment/hiring of staff and/or election of officers	
Review/advisement on SBO/SBAP outreach activities	
Review/comment on new/proposed regulations	
Defining CAP responsibilities	
Attendance by CAP members at training sessions	
Meeting with small businesses/associations	
Other (please list)	

3.7 Please indicate the number of meetings that occurred between the SBO, SBAP, and CAP during the 1997 reporting period.

We are interested in comparing how much communication occurred between the different components of each state SBTCP during the 1997 reporting period, and if these were regularly scheduled or occasional meetings.

To make it easy to complete this question, the table below lists all possible combinations of meetings between these groups. For the question of "Frequency", please indicate if the meetings between these groups are regularly scheduled (i.e., monthly, quarterly, or biannually), or occasional.

MEETINGS BETWEEN WHOM	NUMBER OF MEETINGS DURING THE REPORTING PERIOD	FREQUENCY (Please indicate if monthly, quarterly, biannually, etc.)
SBO and SBAP		
SBO and CAP		
SBO and CAP and SBAP		
SBAP and CAP		

OTHER SERVICES/CONDUCT OF ACTIVITIES

3.8 Does your state have or is your state planning a grant or loan program?

Please indicate if your state has or is planning a financial assistance program to help small businesses comply with the requirements of the CAA.

YES	
NO	

If YES, please indicate the date (month/year) such a grant or loan program became/will become available and the funding levels for each.

DATE AVAILABLE	NAME OF GRANT OR LOAN PROGRAM	FUNDING LEVEL

3.9 Briefly describe how each component of the SBTCP (i.e., SBO, SBAP, and CAP) leverages existing personnel resources (within the state).

This question is critical to understanding how some states, with limited budgets and resources (typically with the SBAP and SBO components) are functioning. For example, have personnel from any other departments been assigned to assist with the program?

SBTCP COMPONENT	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED
SBO	
SBAP	
CAP	

3.10 How does your state SBAP avoid duplication of efforts with SBTCPs in other states?

With this question, we are hoping to find out to what extent states are sharing/exchanging information with SBTCPs in other states. For example, what factsheets or information packets were developed by another state and used (with minimal editing) in your state? To make it easy, please check all appropriate strategies listed below.

Strategy to Avoid Duplication of Efforts	Please check all appropriate boxes
Communication/networking within own SBTCP and state agency personnel via phone, e-mail, mailing lists, etc.	
Meetings, conference calls, and other contacts with SBO/SBAP personnel within EPA region	
Networking through state or regional air group meetings (such as WESTAR-Western States Air Resources)	
Review of EPA documents/contacts with EPA	
Review of documents from other public, private, and/or university sources	
Information gathering from electronic sources	
Subscribe to SBO listserve or government ombudsman listserve	
Other (please list)	

3.11 Please indicate what actions were initiated by your SBTCP/CAP to follow the intent of the provisions of the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act.

One of the responsibilities of the CAP is to critique the SBTCP in following the intent of the provisions of these three federal acts. To make it easy to complete this question, various possibilities for each Act are listed in the tables below. Please add additional items as appropriate.

PAPERWORK REDUCTION ACT	Please check all appropriate boxes
Routine review of SBTCP documents for compliance	
Receiving/providing information electronically	
Simplified/consolidated permits or forms	
Eliminating unnecessary permits by increasing exemptions for insignificant actions	
General permits for certain types of industries	
Concise, easy-to-read summary documents	
Other (please list)	

REGULATORY FLEXIBILITY ACT	Please check all appropriate boxes
Routine review of SBTCP documents for compliance	
Simplified/consolidated permits or forms	
Eliminating unnecessary permits by increasing exemptions for insignificant actions	
Amnesty program	
Review/comment of new air regulations	
Other (please list)	

EQUAL ACCESS TO JUSTICE ACT	Please check all appropriate boxes
Routine review of SBTCP documents for compliance	
Pro bono legal services	
Funding/technical assistance for groups aggrieved by regulatory actions	
Other (please list)	

SECTION 4
PROGRAM EFFECTIVENESS

The questions in this section are designed to collect some external assessments of the SBTCP's program effectiveness and how it is providing a useful service.

We suggest that the questions in this section be completed by either the SBO or the CAP.

4.1 What were some comments (positive or negative) received by the SBO or the CAP on the SBTCP?

To answer this question, we are looking for comments that the SBO or CAP may have received. Additionally, you might wish to attach copies of relevant letters, memos, etc. that your office received.

4.2 What was the nature of the complaints received/initiated by the SBO or the CAP, and how were they resolved?

By collecting some representative information on the type of complaints received and how they were addressed, we believe that there may be some lessons learned that could be shared with other state SBTCPs.

COMPLAINTS	RESOLUTION OF COMPLAINTS

4.3 Please feel free to include any information about your program that you would like to highlight (i.e., significant accomplishments, awards, recognitions, etc.)

To answer this question, please invite the SBO, SBAP, and the CAP to include any information they believe is appropriate. Use as much space as necessary.

SECTION 5
COMPLIANCE ASSURANCE

The first three questions in this section have been included at the request of EPA's Office of Enforcement and Compliance Assurance (OECA).

5.1 What is the total number of eligible facilities identified by your program, by industry sector, that have received assistance by your program from January through December 1996?

NOTE: An eligible facility is defined as a stationary source that: (1) is owned and operated by a person that employs 100 or fewer individuals; (2) is a small business concern as defined by the Small Business Act; (3) is not a major stationary source; (4) does not emit 50 tons or more per year of any regulated pollutant; and (5) emits less that 75 tons per year of all regulated pollutants.)

Please distinguish between general assistance and on-site assistance. What percentage is this of the total eligible pool of facilities? Please photocopy the table on the next page if additional space is needed.

	A	B	C	D	E
INDUSTRY SECTOR	**# OF GENERAL ASSISTANCE**	**# OF ON-SITE ASSISTANCE**	**TOTAL # OF FACILITIES ASSISTED (A+B)**	**# OF ELIGIBLE FACILITIES IN YOUR STATE**	**% OF TOTAL ELIGIBLE POOL OF FACILITIES (C/D)*100**
Example: Dry Cleaners	*71*	*14*	*85*	*400*	*21%*

	A	B	C	D	E
INDUSTRY SECTOR	# OF GENERAL ASSISTANCE	# OF ON-SITE ASSISTANCE	TOTAL # OF FACILITIES ASSISTED (A + B)	# OF ELIGIBLE FACILITIES IN YOUR STATE	% OF TOTAL ELIGIBLE POOL OF FACILITIES (C/D)*100

5.2 What are the most common compliance problems identified by the facilities?

In the course of providing technical assistance, what have been the most common compliance issues addressed? Examples of compliance problems may include incomplete reports, lack of permits for new equipment or changes in processes, operating outside of MACT standard, or unpermitted emissions. Please indicate if certain problems are prevalent in any particular industry sector. A number of possible answers are listed below. Please check all those appropriate.

Common Compliance Problems	Please check all appropriate boxes
Not understanding regulatory requirements	
Operating without a permit	
Incomplete recordkeeping	
Uncertain of permitting requirements/need for multiple permits	
Uncertain how to determine emission inventories/general lack of technical experience	
Uncertain how to complete forms/complicated paperwork	
Lack of financing for pollution control equipment/technologies	
Operating outside NSPS or MACT	
Improper storage/disposal of hazardous waste	
Fear of regulatory agency/arbitrary regulatory enforcement	
Failure to use or find the right equipment to comply with applicable standards	
Other (please list)	

Please add any additional comments you have regarding common compliance problems.

5.3 What have been the improvements in understanding and awareness of regulatory requirements, behavioral changes, and environmental improvements (if tracked) that have resulted from your compliance assistance activities?

From the perspective of the SBAP and SBO, what changes have you seen in businesses as a result of your technical assistance activities? Do you see a relationship between your activities (on-site consultations, hotline, seminars, publications, etc.) and improvements in compliance? Please use as much space as necessary.

Improvements in Compliance as a Result of Compliance Assistance Activities	Please check all appropriate boxes
More open communication between sources and regulatory agencies	
Increased compliance	
Greater understanding of the regulations	
Reduced apprehension/improved attitudes regarding environmental compliance	
Increased registration/permitting of existing sources	
Improvements in pollution prevention practices	
Better recordkeeping	
Other (please list)	

Please add any additional comments you have regarding improvements in compliance.

5.4 What changes would you recommend, at either the state or federal level, to assist small businesses to comply with the CAA?

Please list any suggestions you have. We intend to compile the list of recommendations and highlight these in the report to Congress.

5.5 Briefly describe how the SBTCP avoids internal or external conflicts of interest (COI) or perception that this program may not be confidential. Briefly describe any issues that may have developed and how they were resolved.

In early 1995, EPA's SBO worked with the SBTCPs and EPA's Office of Enforcement and Compliance Assurance to reach an agreement regarding the confidentiality of assistance provided to businesses via the SBTCP.

With this question we are interested in knowing how the states are avoiding COI and maintaining confidentiality – particularly in those cases where the SBAP is located within the regulatory agency.

This is the end of the 1997 SBTCP Annual Reporting Form. Thank you, and all contributors, for the completeness and accuracy of your state's Report. A copy of the EPA 1997 Report to Congress will be provided upon its submittal.

APPENDIX B

FEDERAL SMALL BUSINESS OMBUDSMAN

APPENDIX B
OFFICE OF THE EPA SMALL BUSINESS OMBUDSMAN

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF THE SMALL BUSINESS OMBUDSMAN
401 M STREET, SW (2131)
WATERSIDE MALL, ROOM 3424
WASHINGTON, DC 20460

800-368-5888
202-260-0490 (in DC area)
202-401-2302 (fax)

The Office of the Small Business Ombudsman serves as an effective conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency. The Office reviews and resolves disputes with EPA and works with EPA personnel to increase their understanding of small businesses in the development and enforcement of environmental regulations.

The SBO's primary customer group is the nation's small business community. Significant secondary customer groups include state and EPA regional small business ombudsmen and national trade associations serving small businesses.

In response to the identified needs of the Office's target customer groups, the SBO has undertaken a variety of major outreach efforts including:

- Serving as liaison between small businesses and the EPA to promote understanding of Agency policy and small business needs and concerns.
- Staffing a small business hotline that provides regulatory and technical assistance information.
- Maintaining and distributing an extensive collection of informational and technical literature developed by the various EPA program offices.
- Making personal appearances as a speaker or panelist at small business-related meetings.
- Interfacing on an on-going basis with over 60 key national trade associations representing several million small businesses and with state and regional ombudsmen who serve businesses on the local level. Also in contact with over 400 additional national organizations that represent millions of small businesses.
- Providing guidance on the development of national policies and regulations that impact small businesses.

The SBO actively seeks feedback on its responsiveness to small business' inquiries and ever-evolving needs, primarily in the areas of technical assistance and advocacy. The SBO can

"package" relevant information for the most effective and efficient delivery -- be it through training seminars, fact sheets, or position papers -- to its target audience.

Individual outreach activities are tracked and reported by the SBO on a monthly basis. Key statistics include numbers and types of hotline calls and written inquiries; nature and results of small business advocacy efforts; and personal appearances at conferences, seminars, and training sessions. Random, informal quality checks of customer satisfaction ensures that program performance meets or exceeds customer expectations.

The SBO also serves as the Agency's Asbestos Ombudsman. Information concerning asbestos management may be obtained through the same toll-free hotline service as that which serves small business needs.

SBO STAFF

EPA's Small Business Ombudsman is Karen V. Brown, who was appointed to this position by Administrator Lee Thomas in 1985. In 1988, she was named the Agency's Asbestos Ombudsman in addition to her small business duties. Ms. Brown has served the Agency since 1981 holding a series of management positions. She is a graduate biologist and chemist.

Robert C. Rose, an Industrial Engineer, joined the Office of Asbestos and Small Business Ombudsman as Deputy Ombudsman in 1991. He has over 28 years of management service with EPA.

Staff Assistants to the Ombudsman are James Malcolm, Chemical Engineer; Arnold B. Medbury, P.E., Mechanical Engineer; Larry O. Tessier, P.E., Civil Engineer; and Thomas J. Nakley, Civil Engineer.

TOLL-FREE HOTLINE SERVICE

The Ombudsman operates a toll-free hotline for the convenience of small businesses, trade associations, and others seeking access to the Ombudsman. A member of the Ombudsman's staff will answer between 8:30 AM and 4:30 PM EST. Message-recording devices for calls during non-business hours and overload periods are provided. All calls are personally handled on a fast turn-around basis.

The toll-free hotline number is:

- 800-368-5888
- 202-260-0490 (in DC area)

Callers request information on a variety of topics including:

- Clean Air Act regulations
- Underground storage tank notification
- Small quantity generator requirements
- Effluent standard guidelines
- Used oil
- Asbestos compliance
- Waste minimization/pollution prevention
- Pesticide registration fees

Increases in the number of direct-dial calls and hotline calls (from 4,000 calls per year in the early 1980s to the current level of 1,000 - 1,500 calls per month) and the associated distribution of technical and informational literature, growth in requests for personal appearances at conferences and workshops, and an expansion in participation in policy-making activities are evidence of the customer groups' confidence in the integrity and proactive stance of the SBO.

REGULATORY TRACKING AND ANALYSIS

The SBO performs a careful review of all proposed regulatory actions published in the biannual regulatory agenda to make a prima facia determination of small business impact. From the agenda, certain proposed regulations are selected that appear to have the potential for adverse impact on small businesses. In 1997, the SBO reviewed and/or monitored over 100 regulatory actions with some significant degree of intensity. In all instances, the SBO endeavored to minimize the requirements (especially reporting and record keeping) on small businesses. Equally significant is the level of voluntary compliance with EPA regulations by the small business community as a result of the rapport established between the Ombudsman and trade associations during the developmental phase of the regulations.

MAJOR INITIATIVES IN 1997

The SBO's efforts to assist the small business community continue at a high level. Key accomplishments and activities for 1997 (some of which are on-going) include:

- Hosted fourth National Small Business Ombudsman and Technical Assistance Program Conference in Charleston, SC, which was attended by 43 states and 2 territories (167 participants). Set plans for a fifth conference in March 1998 in Scottsdale, AZ.

- Developed external stakeholder guidance and acted as a principal participant in the Agency's Eighth Regulatory Tiering (prioritizing) Process.
- Served as principal role player in the development of a new EPA policy offering compliance initiatives to small businesses in all media (e.g., waste, water, toxics).
- Coordinated individual meetings and follow-up meetings among major small business trade associations and the EPA Deputy Administrator and Assistant Administrators to discuss small business issues.
- Developed small business regulatory impact studies for several small business trade associations. Preparing "look-back" regulatory impact study justification.
- Participated as key player in the joint Small Business Administration and Office of Management and Budget SBREFA Panel Process.
- Finalized EPA's 1996 Small Business Ombudsman Report to Congress under Section 507 of the 1990 Clean Air Act Amendments.
- Cooperatively managing the Small Business Regulatory Enforcement Fairness Act of 1996 Small Business Entity Outreach Sub-group to implement Act requirements.
- Conducted Small Business Liaison Conference for EPA Regional Small Business Representatives in August 1997.
- Developing an EPA Small Business Ombudsman Internet home page.
- Conducted a Compliance Advisory Panel Training and Networking Meeting in Scottsdale, AZ on September 21, 1997.

APPENDIX C

FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM

APPENDIX C
EPA'S FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM

The EPA provides technical guidance for the use of the states/territories in the implementation of their programs. The Federal Small Business Technical Assistance Program (Federal SBAP) is coordinated by the Information Transfer Group (ITG) of the Office of Air Quality Planning and Standards (OAQPS). Other EPA programs participating in activities to assist the states include the Office of Compliance, the Chemical Emergency Preparedness and Prevention Office, and the Pollution Prevention Division.

ELECTRONIC ACCESS

The Federal SBAP is actively involved in expanding the use of electronic media as a tool for access to EPA information by small businesses, state SBAPs, and the general public.

- The SBAP home page on the World Wide Web, part of the Technology Transfer Network, provides access to EPA small business assistance information and materials. Links to other small business-related sites also are provided. The SBAP home page address is **www.epa.gov/ttn/sbap.** In 1997, users retrieved over 1,000,000 files from the TTN.
- The SBAP home page serves as a communication link for state SBAPs and includes a list of state and EPA small business program contacts. The home page also provides a forum to share information and outreach materials developed specifically for small businesses.
- The Office of Air and Radiation, Policy and Guidance home page, also part of the Technology Transfer Network, contains proposed and final rules; background, guidance, and plain-English fact sheets; and implementation strategy updates and schedules.

PLAIN ENGLISH GUIDANCE MATERIALS

The Federal SBAP prepares materials for use by the states to explain new EPA CAA rules in plain English. These include detailed guidebooks with options for compliance, including pollution prevention; sample reporting and recordkeeping forms; and example calculations. These are distributed to state SBAPs as well as directly to small businesses; both hard copy and electronic formats are provided to allow for state-specific customization and reproduction as needed.

- Halogenated Solvent Cleaning (completed May 1995).
- Chromium Electroplating and Anodizing (completed May 1995).
- *Wood Furniture (completed September 1997 - over 300 copies of this document were* downloaded from the SBAP home page in a three week period).

Work has started on guidance for Potential-To-Emit (PTE) to assist businesses with PTE calculations. This document will be available in late 1998.

SATELLITE SEMINARS

The Federal SBAP is working with EPA's Small Business Ombudsman (SBO) and OAQPS's Education and Outreach Group to present a series of satellite downlink seminars to educate small businesses on new EPA air regulations. These seminars include:

- Perc Drycleaners (May 1994) had 3,000 participants at 197 sites in 48 states, one Canadian site, and two in Mexico.
- Halogenated Solvent Cleaning/Degreasing (May 1995) had 1,300 participants at 101 sites in 45 states, one site in Canada, and two in Mexico.
- Chromium Electroplating (November 1995) had 2,000 participants at 140 sites in 43 states.
- Green and Profitable Printing (May 1996) was presented in cooperation with EPA's Office of Compliance through the Printer's National Environmental Assistance Center.
- Wood Furniture Manufacturing (September 1996) had approximately 1,900 participants at 140 sites in 34 states.
- Consumer Products expected to be broadcast in late 1998.

ANNUAL CONFERENCE

EPA holds an annual SBO/SBAP Conference, which is co-sponsored by OAQPS's Federal SBAP and the EPA SBO with participation by the Office of Compliance, the Pollution Prevention Division, and the Chemical Emergency Planning and Prevention Office. The majority of the conference planning and presentations was carried out by the states. The 1997 meeting was held in Charleston, SC with 167 attendees from 45 states and territories, and six local agencies. The purpose of this meeting was to:

- Facilitate communication among the state programs.
- Facilitate implementation and operation of small business assistance programs.
- Interpret regulatory and policy developments affecting small businesses.
- Share EPA activities and programs to assist state SBAPs.

OTHER PARTNERSHIP ACTIVITIES

The Federal SBAP is working with staff from EPA's Office of Policy, Office of Compliance, and Pollution Prevention Division to determine a strategy to encourage all of the various small business assistance providers (i.e., SBAPs, Small Business Development Centers, pollution prevention programs, Manufacturing Extension Programs, etc.) to coordinate efforts within their state. This would provide small businesses with easier access to comprehensive business and environmental assistance.

APPENDIX D

SBTCP STATUS, BUDGETS, STAFFING AND ORGANIZATION

TABLE D-1
STATE SMALL BUSINESS ASSISTANCE PROGRAMS
KEY CONTACT LISTING
MARCH 1999

STATE	OMBUDSMAN	SBAP	OTHER SBAP
ALABAMA	Blake Roper, Ombudsman Administrative Division Department of Environmental Management P.O. Box 301463 Montgomery, AL 36130-1463 334-213-4308 334-213-4399 (F) 800-533-2336 (national) rbr@adem.state.al.us	James Moore Air Division Department of Environmental Management P.O. Box 301463 Montgomery, AL 36130-1463 334-271-7861 334-271-7950 (F) 800-533-2336 (national)	Mike Sherman Air Division Department of Environmental Management P.O. Box 301463 Montgomery, AL 36130-1463 334-271-7861 334-271-7950 (F) 800-533-2336 (national)
ALASKA	David Wigglesworth Small Business Advocate AK DEC 555 Cordova Street Anchorage, AK 99501 907-269-7582 907-269-7600 (F) 800-510-2332 (state) dwiggles@envircon.state.ak.us	Scott Lytle Small Business Assistance AK DEC 555 Cordova Street Anchorage, AK 99501 907-269-7571 907-269-7600 (F) 800-510-2332 (state) slytle@envircon.state.ak.us	
ARIZONA	Dual role SBO and SBAP	Gregory Workman AZ DEQ - Compliance Assistance 3033 N. Central Avenue Phoenix, AZ 85012 602-207-4337 602-207-4872 (F) 800-234-5677 (state) workman.gregory@ev.state.az.us	
ARIZONA - Maricopa County		Richard Polito Maricopa County SBEAP 1001 N. Central, Suite 200 Phoenix, AZ 85004 602-506-5102 602-506-6669 (F) rpolito@estrp.maricopa.gov	

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
ARKANSAS	Robert Graham Department of Pollution Control & Ecology P.O. Box 8913 Little Rock, AR 72219-8913 501-682-0708 501-682-0707 (F) 888-233-0326 (national) grahamr@adeq.state.ar.us		
CALIFORNIA	James Schoning Small Business Ombudsman California EPA Air Resources Board 2020 L Street P.O. Box 2815 Sacramento, CA 95814 916-323-6791 916-323-2393 (F) 800-272-4572 (state) jschonin@arb.ca.gov	Peter Venturini California EPA Air Resources Board Stationary Source 2020 L Street P.O. Box 2815 Sacramento, CA 95814 916-445-0650 916-327-7212 (F) 800-272-4572 (state)	Jon Pederson California EPA CARB-Office of Sm. Business Ombudsman 2020 L Street P.O. Box 2815 Sacramento, CA 95814 916-322-2825 916-323-2393 (F) jpederso@arb.ca.gov
CALIFORNIA - South Coast	La Ronda Bowen Public Advisor South Coast Air Management District Small Business Assistance Office 21865 E. Copley Drive Diamond Bar, CA 91765 909-396-3235 909-396-3335 (F) lbowen@aqmd.gov	Lee Lockie Director South Coast Air Management District Small Business Assistance Office 21865 E. Copley Drive Diamond Bar, CA 91765 909-396-2390 909-396-3811 (F)	
COLORADO	Cathy Heald CDPHE OCS-INF-A1 4300 Cherry Creek Drive, South Denver, CO 80246-1530 303-692-2034 303-691-1979 (F) 800-886-7689 (state) cathy.heald@state.co.us	Nick Melliadis CDPHE APCD/55/B-1 4300 Cherry Creek Drive, South Denver, CO 80246-1530 303-692-3175 303-782-5493 (F) nick.melliadis@state.co.us	

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
CONNECTICUT	Tracy Babbidge, Ombudsman Small Business Assistance Program Department of Environmental Protection 79 Elm Street Hartford, CT 06106-5127 860-424-3382 860-424-4063 (F) 800-760-7036 (state) tracy.babbidge@po.state.ct.us	Glen Daraskevich Small Business Assistance Department of Environmental Protection Environmental Quality Division 79 Elm Street Hartford, CT 06106-5127 860-424-3545 860-424-4063 (F) 800-760-7036 (state) glen.daraskevich@po.state.ct.us	Kirsten Cohen Small Business Assistance Department of Environmental Protection 79 Elm Street Hartford, CT 06106-5127 860-424-3548 860-424-4063 (F) 800-760-7036 (state)
DELAWARE	George Petitgout DE Small Business Ombudsman DNREC P.O. Box 1401 Dover, DE 19903 302-739-6400 302-739-6242 (F) gpetitgout@dnrec.state.de.us	George Petitgout Dual Role as SBAP Director	Bob Barrish DNREC 715 Grantham Lane New Castle, DE 19720 302-323-4542 302-323-4561 (F)
DISTRICT OF COLUMBIA	Donald Wambsgans, II Acting Small Business Ombudsman EHA (Department of Health) 2100 Martin Luther King Avenue, SE Washington, DC 20020 202-645-6093 x3067 202-645-6102 (F) dwambsgan@mail.environ.state.dc.us	Olivia Achuko Air Quality Division EHA/Department of Health 2100 Martin Luther King Avenue, SE Washington, DC 20020 202-645-6093 x3071 202-645-6102 (F) noa@mail.environ.state.dc.us	
FLORIDA	Elsa Bishop Small Business Ombudsman Department of Environmental Protection 2600 Blair Stone Road, MS-5500 Tallahassee, FL 32399-2400 850-414-8399 850-922-6979 (F) 800-722-7457 (state) bishop_e@dep.state.fl.us	Tom LeDew FL SBAP - MS-5500 Department of Environmental Protection 2600 Blair Stone Road, MS-5510 Tallahassee, FL 32399-2400 850-922-8978 850-922-6979 (F) 800-722-7457 (state) LeDew_T@dep.state.fl.us	Charles Logan FL SBAP - MS-5500 Department of Environmental Protection 2600 Blair Stone Road, MS-5500 Tallahassee, FL 32399-2400 850-922-9589 850-922-6979 (F) 800-722-7457 (state) logan_c@dep.state.fl.us
GEORGIA	Marvin Lowry GA SBAP 4244 International Parkway, Suite 120 Atlanta, GA 30354 404-362-2656 404-363-7100 (F) marvin_lowery@mail.dnr.state.ga.us	Anita Dorsey-Word GA SBAP 4244 International Parkway, Suite 136 Atlanta, GA 30354 404-362-4842 404-363-7100 (F) adword@mail.dnr.state.ga.us	

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
HAWAII	Anthony Ching HI Department of Health Compliance Assistance Office 919 Ala Moana Boulevard Honolulu, HI 96814 808-586-4527 808-586-7236 (F) Tjching@mail-health.state.hi.us	Robert Tam HI Department of Health Clean Air Branch 919 Ala Moana Boulevard Honolulu, HI 96814 808-586-4200 808-586-4359 (F)	Willie Nagamine HI Department of Health Clean Air Branch P.O. Box 3378 Honolulu, HI 96801 808-586-4200 808-586-4359 (F)
IDAHO	Doug McRoberts ID DEQ/PL&E Statehouse Mail 1410 North Hilton Boise, ID 83706 208-373-0497 208-373-0169 (F) dmcrober@deq.state.id.us		
ILLINOIS	Donald Squires Illinois EPA/DAPC Small Business Ombudsman 2200 Churchill Road P.O. Box 19276 Springfield, IL 62794-9276 217-785-1625 217-782-9039 (F) 888-372-1996 (state) epa813@epa.state.il.us	Mark Enstrom Illinois Department of Commerce and Community Affairs 520 East Adams Springfield, IL 62701 217-524-0169 217-785-6328 (F) 800-252-3998 (state) menstrom@commerce.state.il.us	John Kelley Illinois EPA J.R. Thompson Center 100 West Randolph, Suite 11-300 Chicago, IL 60601 312-814-6026 312-814-1825 (F)
INDIANA	Maggie McShane IDEM/OBR 100 N. Senate P.O. Box 6015 Indianapolis, IN 46206-6015 317-232-8598 317-232-6647 (F) 800-451-6027 (state)	Cheri Storms IDEM/OPP & TA/VOC 100 N. Senate, Room 1320 P.O. Box 6015 Indianapolis, IN 46206-6015 317-233-1041 317-233-5627 (F) 800-451-6027 (press 0, request x3-1041) cstor@opn.dem.state.in.us	

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
IOWA	Linda King IA Department of Development Small Business Liaison 200 E. Grand Street Des Moines, IA 50309 515-242-4761 515-242-4749 (F) 800-358-5510 (state) linda.king@ided.state.ia.us	John Konefes IA Waste Reduction Center University of Northern Iowa 1005 Technology Parkway Cedar Falls, IA 50614-0185 319-273-8905 319-268-3733 (F) 800-422-3109 (state) konefes@uni.edu	Chris Klemesrud Iowa Department of Natural Resources Air Quality Bureau 7900 Hickman Avenue, Suite 1 Urbandale, IA 50322 515-281-6318 515-242-5094 (F)
KANSAS	Janet Neff Environmental Ombudsman Office of Pollution Prevention KS DH&E Forbes Field, Building 283 Topeka, KS 66620 785-296-0669 785-291-3266 (F) 800-357-6087 (national)	Frank Orzulak, Director Continuing Education Building University of Kansas Lawrence, KS 66045 785-864-3978 785-864-5827 (F) 800-578-8898 (national) forzulak@falcon.cc.ukans.edu	Theresa Hodges Pollution Prevention Director KS DH&E Forbes Field, Building 283 Topeka, KS 66620 785-296-6603 785-291-3266 (F) USKANG4N@IBMmail.com
KENTUCKY	Rose Marie Wilmoth Air Quality Representative Office of Commissioner Department for Environmental Protection 14 Reilly Road Frankfort, KY 40601 502-564-2150, x128 502-564-4245 (F) 800-926-8111 (national) wilmoth@nrdep.nr.state.ky.us	Gregory C. Copley, Director Kentucky Business Environmental Assistance Program Gatton College of Business and Economics University of Kentucky Lexington, KY 40506-0034 606-257-1131 606-323-1907 (F) 800-562-2327 (national) gccopl1@pop.uky.edu	Monica Hale-Kehrt Division of Air Quality KY DNR&EP 803 Schenkel Lane Frankfort, KY 40601 502-573-3382 502-573-3787 (F)
LOUISIANA	Jim Friloux, Small Business Ombudsman LA DEQ P.O. Box 82263 Baton Rouge, LA 70804 504-765-0735 504-765-0746 (F) 800-259-2890 (state) jim_f@deq.state.la.us	Dick Lehr LA Department of Environmental Quality (Air) P.O. Box 82135 Baton Rouge, LA 70884-2135 504-765-2453 504-765-0921 (F) 800-259-2890 (state) richard_l@deq.state.la.us	

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
MAINE	Ron Dyer Department of Environmental Protection Office of Innovation and Assistance Station 17 State House Augusta, ME 04333 207-287-4152 207-287-2814 (F) 800-789-9802 (state) ron.e.dyer@state.me.us	Brian Kavanah Department of Environmental Protection Office of Innovation and Assistance Station 17 State House Augusta, ME 04333 207-287-6188 207-287-2814 (F) 800-789-9802 (state) brian.w.kavanah@state.me.us	Jim Brooks Department of Environmental Protection Bureau of Air Quality Station 17 State House Augusta, ME 04333 207-287-2437 207-287-7641 (F)
MARYLAND	John Mitchell MD Department of the Environment Office of Community Assistance 2500 Broening Highway Baltimore, MD 21224 410-631-3003 410-631-4108 (F) 800-633-6101, x3003 (state) jmitchell@mde.state.md.us	Andrew Gosden MD Department of the Environment Environmental Permits Service Center 2500 Broening Highway Baltimore, MD 21224 410-631-4158 410-631-3896 (F) 800-433-1247 (N)	Susan Battle Environmental Permits Service Center MD Department of the Environment 2500 Broening Highway Baltimore, MD 21224 410-631-3165 410-631-3896 (F) 800-433-1247 (national) sbattle@mde.state.md.us
MASSACHUSETTS			Rick Reibstein Executive Office of Env. Affairs Room 2109 100 Cambridge Street Boston, MA 02202 617-727-3260 x688 617-727-3827 (F) rick.reibstein@state.ma.us
MICHIGAN	Dana Cole MI Jobs Commission Victor Center, 4th Floor 201 N. Washington Lansing, MI 48913 517-335-1847 517-335-0198 (F)	Dave Fiedler MDEQ Environmental Assistance Division 333 South Capitol Avenue, Suite 200 P.O. Box 30457 Lansing, MI 48909 517-373-0607 517-335-4729 (F) 800-662-9278 (national) fiedlerd@state.mi.us	

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
MINNESOTA	Charlie Kennedy MPCA/PP/RF 520 Lafayette Road St. Paul, MN 55155-4194 651-297-8615 651-297-8324 (F) 800-985-4247 (state) charlie.kennedy@pca.state.mn.us	Troy Johnson MPCA/MDRF/SBAP 520 Lafayette Road St. Paul, MN 55155 651-296-7767 651-282-6247 (F) 651-282-6143 or 800-657-3939 troy.johnson@pca.state.mn.us	
MISSISSIPPI	Jesse Thompson Small Business Ombudsman MS DEQ P.O. Box 10385 Jackson, MS 39289-0385 601-961-5171 601-961-5742 (F) 800-725-6112 (national) Jesse_Thompson@deq.state.ms.us		
MISSOURI	Greg Johnston State of Missouri Office of the Governor State Capitol Jefferson City, MO 65102 573-751-3222 573-526-5808 (F) 800-361-4827 (national) johnsg@mail.gov.state.mo.us	Byron Shaw, Jr. DNR Technical Assistance Program Jefferson State Office Building P.O. Box 176 Jefferson City, MO 65102 573-526-6627 573-526-5808 (F) 800-361-4827 (national) bshaw01@mail.state.mo.us	
MONTANA	Karen Ekstrom Department of Environmental Quality Business & Community Assistance 1520 E. 6th Avenue Helena, MT 59620-0901 406-444-2960 406-444-6836 (F) 800-433-8773 (national) kekstrom@mt.gov	Warren Norton Department of Environmental Quality Air Quality Division 1520 E. 6th Avenue Helena, MT 59620-0901 406-444-5281 406-444-1499 (F) 800-433-8773 (national) wnorton@mt.gov	Mark Lambrecht Department of Environmental Quality Mgr. Bus. and Community Assistance 1520 E. 6th Avenue Helena, MT 59620-0901 406-444-2960 406-444-6836 (F) 800-433-8773 (national) malambracht@mt.gov
NEBRASKA	Dan Eddinger Public Advocate Department of Environmental Quality P.O. Box 98922 Lincoln, NE 68509-8922 402-471-3413 402-471-2909 (F) edh@nccibm.rtpnc.epa.gov	Dan Eddinger Dual Role as Ombudsman and SBAP Principal	

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
NEVADA	Marcia Manley Small Business Ombudsman NV Department of Environmental Protection 333 West Nyle Lane Carson City, NV 89706-0851 702-687-4670, x3162 702-687-5856 (F) 800-992-0900, x4670 (state) mmanley@ndep.carson-city.nv.us	Janet Goodman Small Business Program Manager NV Department of Environmental Protection 333 West Nyle Lane Carson City, NV 897060851 702-687-4670, x3164 702-687-5856 (F) 800-992-0900, x4670 (state)	Kevin Dick UNR/NV SBDC Business Environmental Program College of Business Administration-032 Reno, NV 89505-9975 702-784-1717 702-784-4237 (F)
NEW HAMPSHIRE	Rudolph Cartier Dual Role as Ombudsman and SBAP Principal	Rudolph Cartier Air Resources Division Department of Environmental Services 64 North Main Street, 2nd Floor Concord, NH 03301-2033 603-271-1379 603-271-1381 (F) 800-837-0656 (state) r_cartier@des.state.nh.us	
NEW JERSEY	Lauren Moore Office of Business Advocacy NJ Department of Commerce 20 West State Street P.O. Box 839 Trenton, NJ 08625-0839 609-292-3863 609-777-4097 (F) 800-643-6090 (national) ceamoor@commerce.state.nj.us	Chuck McCarty SBAP NJ DEPE P.O. Box 423 Trenton, NJ 08625-0423 609-292-3600 609-777-1330 (F) cmccarty@dep.state.nj.us	Jeanne Mroczko Pollution Prevention-Permit Coordinator SBAP NJ DEPE P.O. Box 423 Trenton, NJ 08625-0423 609-292-3600 609-777-1330 (F)
NEW MEXICO	Robert Horwitz NM ED/AQB Harold Runnels Building P.O. Box 26110 Santa Fe, NM 87502 505-827-9685 505-827-0045 (F) 800-810-7227 (national)	Cecilia Williams NM ED/AQB Harold Runnels Building P.O. Box 26110 Santa Fe, NM 87502 505-827-0042 505-827-0045 (F) 800-810-7227 (national)	John Liberature City of Albuquerque EHD/APCD P.O. Box 1293 Albuquerque, NM 87103 505-768-1964 505-768-2617 (F)

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
NEW YORK	Tria Case Supervisor, Division of Small Business Environmental Ombudsman Unit Empire State Development, 32nd Floor 633 3rd Avenue New York, NY 10017 212-803-2282 212-803-2309 (F) 800-782-8369 (national) tcase@empire.state.ny.us	Marian J. Mudar, Ph.D. Environmental Program Manager Small Business Assistance Program NYS Environmental Faciliites Corporation Albany, NY 12205 518-457-9135 518-457-8681 (F) 800-780-7227 (state only) mudar@nysefc.org	Patrick Lentile Bureau of Technical Support NYS Dept. of Environmental Conservation Division of Air Resources 50 Wolf Road, Room 110 Albany, NY 12233 518-457-7450 518-457-0794 (F) pxlentli@gw.dec.state.ny.us
NORTH CAROLINA	Edythe McKinney Office of the Small Business Ombudsman Department of Environment, Health, and Natural Resources P.O. Box 29583 Raleigh, NC 27626 919-733-0823 919-715-6794 (F) 800-829-4841 (national) edythe_mckinney@p2pays.org	Karen Davis Office of the Small Business Ombudsman Department of Environment, Health, and Natural Resources P.O. Box 29583 Raleigh, NC 27604 919-733-1267 919-715-6794 (F) 800-829-4841 (national)	
NORTH DAKOTA	Jeff Burgess ND SDH&CL P.O. Box 5520 Bismark, ND 58506 701-328-5153 701-328-5200 (F) 800-755-1625 (state) ccmail.jburgess@ranch.state.nd.us	Tom Bachman ND SDH&CL Division of Environmental Engineering P.O. Box 5520 Bismark, ND 58506 701-328-5188 701-328-5200 (F) 800-755-1625 (state)	Dana Mount ND SDH&CL Division of Environmental Engineering P.O. Box 5520 Bismark, ND 58506 701-328-5188 701-328-5200 (F) 800-755-1625 (state)
OHIO	Mark Shanahan Clean Air Resource Center 50 West Broad Street, Suite 1901 Columbus, OH 43215-5985 614-728-3540 614-752-9188 (F) 800-225-5051 (state) mark.shanahan@agda.state.oh.us	Rick Carleski Ohio EPA Division of Air Pollution 1600 Watermark Drive Columbus, OH 43215 614-728-1742 614-644-3681 (F) rcarlesk@epa.state.oh.us	Bob Hodanbosi OEPA/DAPC P.O. Box 1049 1600 Watermark Drive Columbus, OH 43215 614-644-2270 614-644-3681 (F)

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
OKLAHOMA	Steve Thompson Deputy Executive Director OK Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677 405-702-7163 405-702-8425 (F) Steve.Thompson@deqmail.state.ok.us	Alwin Ning Small Business Program Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677 405-702-6100 405-702-1317 (F) 800-869-1400 (national) alwin.ning@deqmail.state.ok.us	Kyle Arthur OK Department of Environmental Quality 1000 NE 10th Street Oklahoma City, OK 73117-1212 405-702-6100 405-702-1317 (F) 800-869-1400 (national) kyle.arthur@deqmail.state.ok.us
OREGON	Paul Burnet OR DEQ 811 SW 6th Avenue Portland, OR 97204-1390 503-229-5776 503-229-6945 (F) 800-452-4011 (state) burnet.paul@deq.state.or.us	Jill Inahara OR DEQ Air Quality Division 811 SW 6th Avenue Portland, OR 97204 503-229-6147 503-229-5675 (F) 800-452-4011 (state)	
PENNSYLVANIA	Greg Czarnecki Office of P2 & Compliance Assistance PA DEP RCSOB, 13th Floor P.O. Box 8772 Harrisburg, PA 17105-8468 717-772-8951 717-783-2703 (F) Czarnecki.Gregory@a1.dep.state.pa.us	Scott Kepner Bureau of Air Quality Control PA DEP P.O. Box 8468 Harrisburg, PA 17105-8468 717-787-1663 717-772-2303 (F) Kepner.Scott@a1.dep.state.pa.us	Cecily Beall PRC Environmental Management, Inc. 1800 JFK Boulevard, 6th Floor Philadelphia, PA 19103 215-656-8709 215-972-0484 (F) 800-722-4343 (national) beallc@prcemi.com
PUERTO RICO	Tomas DeLeon Administrator, Commercial Development Administration Office P.O. Box 4275 San Juan, PR 00902 787-724-1451 787-722-8477 (F)	Maria Rivera PREQB -SBAP IIC - 91, Box 9197 Vega Alta, PR 00692-9607 787-767-8025, x296 787-756-5906 (F) jcaaire@prtc.net	
RHODE ISLAND	Roger Greene RI Department of Environmental Management 235 Promenade Street Providence, RI 02908 401-222-2771 x2402 401-277-4546 (F) 800-932-1000 (state)	Pam Annarummo RI Department of Environmental Management 235 Promenade Street Providence, RI 02908 401-222-6822, x7204 401-277-3810 (F) 800-253-2674 (state)	Joe Antonio RI Department of Environmental Management Technical/Customer Assistance 235 Promenade Street Providence, RI 02908 401-222-6822, x4410 401-277-3810 (F) 800-253-2674 (state)

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
SOUTH CAROLINA	Phyllis T. Copeland, SBO SC Department of Health & Environmental Control 2600 Bull Street Columbia, SC 29201 803-898-3997 803-898-3939 (F) 800-819-9001 (national) copelapt@columb30.dhec.state.sc.us	Rose Stancil SBAP Technical Engineer Assistant SC Department of Health & Environmental Control 2600 Bull Street Columbia, SC 29201 803-898-3981 803-898-3939 (F) 800-819-9001 (national) stancirr@columb30.dhec.state.sc.us	Willie Morgan Bureau of Air Quality Control SC Department of Health & Environmental Control 2600 Bull Street Columbia, SC 29201 803-898-3957 803-898-3939 (F) 800-819-9001 (national) morganwj@columb30.dhec.state.sc.us
SOUTH DAKOTA	Joe D. Nadenicek Small Business Ombudsman SD Department of Environment & Natural Resources Joe Foss Building 523 East Capitol Pierre, SD 57501 605-773-3151 605-773-6035 (F) 800-438-3367 (state) joen@denr.state.sd.us	Bryan Gustafson SD Department of Environment & Natural Resources Joe Foss Building 523 East Capitol Pierre, SD 57501 605-773-3351 605-773-6035 (F) 800-438-3367 (state) briang@denr.state.sd.us	
TENNESSEE	Ernest Blankenship TN Department of Environment & Conservation L&C Tower, 8th Floor 401 Church Street Nashville, TN 37243-1551 615-741-5262 615-532-8007 (F) 800-734-3619 (national) eblankenship@mail.state.tn.us	Linda Sadler Small Business Assistance Program L&C Annex, 8th Floor 401 Church Street Nashville, TN 37243-1551 615-532-0779 615-532-0614 (F) 800-734-3619 (national) lsadler@mail.state.tn.us	
TEXAS	Tamra Shae-Oatman Small Business Advocate TNRCC (Mail Code 106) P.O. Box 13087 Austin, TX 78711-3087 512-239-1062 512-239-1065 (F) 800-447-2827 (national) toatman@tnrcc.state.tx.us	Bridget Bohac TNRCC (Mail Code 106) P.O. Box 13087 Austin, TX 78711-3087 512-239-1056 512-239-1065 (F) 800-447-2827 (national) bbohac@tnrcc.state.tx.us	

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
UTAH	Stephanie Bernkopf UT Department of Environmental Quality Office of the Small Business Ombudsman 168 North 1950 West Salt Lake City, UT 84114-4810 801-536-4479 801-536-4099 (F) sbernkop@deq.state.ut.us	Ron Reece, Environmental Engineer UT Department of Environmental Quality Division of Air Quality P.O. Box 144820 Salt Lake City, UT 84114-4820 801-536-4091 801-536-4099 (F) 800-447-2827 (national) rreece@deq.state.ut.us	
VERMONT		Judy Mirro VT Environmental Assistance Division Laundry Building 103 South Main Street Waterbury, VT 05671 802-241-3745 802-241-3273 (F) 800-974-9559 (state) judym@dec.anr.state.vt.us	Kevin Bracey VT APCD Building 3 South 103 South Main Street Waterbury, VT 05671 802-241-3841 802-241-2590 (F) kevinb@qtm.anr.state.vt.us
VIRGINIA	John Daniel, Air Division Director VA Department of Environmental Quality P.O. Box 10009 Richmond, VA 23240 804-698-4311 804-698-4510 (F) 800-592-5482 (state) jmdaniel@deq.state.va.us	Richard Rasmussen Manager, Small Business Assistance Program VA Department of Environmental Quality P.O. Box 10009 Richmond, VA 23240 804-698-4394 804-698-4510 (F) 800-592-5482 (state) rgrasmusse@deq.state.va.us	
VIRGIN ISLANDS	Dual role SBO/SBAP Principal.	Marylyn A. Stapleton VI Department of Planning & Natural Resources Division of Environmental Protection 8000 Nisky Center, Suite 231 Charlotte Amalie, St. Thomas, VI 00802 340-777-4577 340-774-5416 (F)	Jasmine A. Blyden VI Department of Planning & Natural Resources Division of Environmental Protection 8000 Nisky Center, Suite 231 Charlotte Amalie, St. Thomas, VI 00802 340-777-4577 340-774-5416 (F)

TABLE D-1
(Continued)

STATE	OMBUDSMAN	SBAP	OTHER SBAP
WASHINGTON	Leighton Pratt WA Department of Ecology Air Quality Program P.O. Box 47600 Olympia, WA 98504-7600 360-407-7018 360-407-6802 (F) lpra461@ecy.wa.gov	Bernard Brady WA Department of Ecology Air Quality Program P.O. Box 47600 Olympia, WA 98504-7600 360-407-6803 360-407-6802 (F) bbra461@ecy.wa.gov	
WEST VIRGINIA	Kenneth Shaw WV Division of Environmental Protection Office of Air Quality 1558 Washington Street, SE Charleston, WV 25311 304-558-1218 304-558-1222 (F) 800-982-2474 (state)	Fred Durham WV Division of Environmental Protection Office of Air Quality 1558 Washington Street, SE Charleston, WV 25311 304-558-1217 304-558-1222 (F) 800-982-2474 (state) fred_durham@hotmail.com	
WISCONSIN	Hampton Rothwell, Director Business Development Assistance Center WI Department of Commerce P.O. Box 7970 201 West Washington Avenue Madison, WI 53707 608-267-0313 608-267-0436 (F) 800-435-7287 (national) hrothwell@commerce.state.wi.us	Pam Christenson Technical Assistance Director Department of Commerce WI SBAP, 6th Floor 201 West Washington Avenue Madison, WI 53703 608-267-9214 608-267-0436 (F) 800-435-7287 (national) pchristenson@commerce.state.wi.us	Cliff Fleener WI Department of Commerce 201 West Washington Avenue P.O. Box 7970 Madison, WI 53707 608-264-6153 608-267-0436 (F) 800-435-7274 (national) cfleener@commerce.state.wi.us
WYOMING	Dan Clark WY Department of Environmental Quality OA/Small Business Ombudsman 122 W. 25th Street Cheyenne, WY 82002 307-777-7388 307-777-3773 (F) dclark@missc.state.wy.us	Charles Raffelson WY Department of Environmental Quality Division of Air Quality 122 W. 25th Street Cheyenne, WY 82002 307-777-7347 307-777-5616 (F) craffe@missc.state.wy.us	Dan Olson Department of Environmental Quality Division of Air Quality 122 W. 25th Street Cheyenne, WY 82002 307-777-7391 307-777-3616 (F)

TABLE D-1
(Continued)

E-mail addresses for the California Air Pollution Control Districts are shown in the following table.

CALIFORNIA AIR POLLUTION CONTROL DISTRICT	E-MAIL ADDRESS
Amador County	amaair@cdepot.net
Antelope Valley	fwohosky@mdaqmd.ca.gov
Bay Area	webmaster@baaqmd.gov
Butte County	
Calaveras County	
Colusa County	ccagair@colusanet.com
El Dorado County	
Feather River	
Glenn County	gcairag@maxinet.com
Great Basin	
Imperial County	ICAPCD@quix.net
Kern County	kcapcd@kerncounty.com
Lake County	bobr@pacific.net
Lassen County	
Mariposa County	
Mendocino County	
Modoc County	
Mojave Desert	fwohosky@mdaqmd.ca.gov
Monterey Bay	dquetin@mbuapcd.org
North Coast	
Northern Sierra	nsaqmd@nccn.net
Northern Sonoma County	nsc@sonic.net
Placer County	
Sacramento Metro	
San Diego County	
San Joaquin Valley	
San Luis Obispo County	cleanair@sloaqcd.dst.ca.us
Santa Barbara County	apcd@apcd.santa-barbara.ca.us

TABLE D-1
(Continued)

E-mail addresses for the California Air Pollution Control Districts are shown in the following table.

CALIFORNIA AIR POLLUTION CONTROL DISTRICT	E-MAIL ADDRESS
Amador County	amaair@cdepot.net
Antelope Valley	fwohosky@mdaqmd.ca.gov
Bay Area	webmaster@baaqmd.gov
Butte County	
Calaveras County	
Colusa County	ccagair@colusanet.com
El Dorado County	
Feather River	
Glenn County	gcairag@maxinet.com
Great Basin	
Imperial County	ICAPCD@quix.net
Kern County	kcapcd@kerncounty.com
Lake County	bobr@pacific.net
Lassen County	
Mariposa County	
Mendocino County	
Modoc County	
Mojave Desert	fwohosky@mdaqmd.ca.gov
Monterey Bay	dquetin@mbuapcd.org
North Coast	
Northern Sierra	nsaqmd@nccn.net
Northern Sonoma County	nsc@sonic.net
Placer County	
Sacramento Metro	
San Diego County	
San Joaquin Valley	
San Luis Obispo County	cleanair@sloaqcd.dst.ca.us
Santa Barbara County	apcd@apcd.santa-barbara.ca.us

TABLE D-1
(Continued)

CALIFORNIA AIR POLLUTION CONTROL DISTRICT	E-MAIL ADDRESS
Shasta County	scaqmd@snowcrest.net
Siskiyou County	
South Coast	sbao@aqmd.gov
Tehama County	tehapcd@snowcrest.net
Tuolumne County	
Ventura County	info@vcapcd.org
Yolo-Solano	ysaqmd@dcn.davis.ca.us

TABLE D-2
DATES OF ESTABLISHMENT AND COMMENCEMENT OF SBTCP OPERATIONS

STATE OR TERRITORY	MONTH & YEAR OF ESTABLISHMENT			MONTH & YEAR OPERATIONS BEGAN		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Alabama	5/93	7/94	7/97	5/93	7/94	N/R
Alaska	6/95	6/95	6/95	6/95	6/95	11/95
Arizona	1/93	1/93	1/93	1/93	3/94	N/O
Maricopa Cty	N/R	1/95	N/R	N/R	2/95	N/R
Arkansas	11/93	11/93	6/95	11/93	11/93	6/95
California	10/92	before 1990	N/E	4/95	before 1990	N/O
Kerns Cty	5/92	5/92	N/A	5/92	5/92	N/A
South Coast	6/89*	6/89*	N/A	6/89*	6/89*	N/A
Colorado	7/92	7/92	7/92	9/92	9/92	4/94
Connecticut	4/93	4/93	12/94	4/93	4/93	12/94
Delaware	12/95	12/95	12/97	12/95	12/95	N/O
District of Columbia	12/93	1/94	2/96	9/95	1/94	N/O
Florida	11/92	11/92	1/95	11/92	11/92	1/95
Georgia	2/92	11/92	5/93	7/92	7/93	11/94
Hawaii	N/E	N/E	N/E	N/O	N/O	N/O
Idaho	10/93	4/94	5/94	10/93	4/94	5/94
Illinois	5/92	9/92	N/E	5/92	11/94	N/O
Indiana	3/93	1/95	7/95	3/93	3/94	7/95
Iowa	10/94	10/92	N/E	10/94	10/92	N/O
Kansas	11/93	3/94	12/93	11/93	3/94	12/93

N/A Not applicable N/E Not established
N/O Not operational N/R No response

TABLE D-2
(Continued)

STATE OR TERRITORY	MONTH & YEAR OF ESTABLISHMENT			MONTH & YEAR OPERATIONS BEGAN		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Kentucky	6/92 (part time) 2/95 (full time)	7/94	10/94	6/92 (part time) 2/95 (full time)	10/94	3/95
Jefferson Cty	8/95	11/95	See state resp.	8/95	Always provided tech. asst. for sm. bus.	See state resp.
Louisiana	11/92	11/92	10/93	11/92	11/92	10/93
Maine	10/93	10/93	10/93	11/93	4/94	4/94
Maryland	4/94	4/94	N/E	4/94	4/94	N/O
Massachusetts	N/E	11/93*	N/E	N/O	1989*	N/O
Michigan	10/95	9/94	9/94	10/95	9/94	9/94
Minnesota	4/92	4/92	4/92	6/93	8/93	9/93
Mississippi	7/93	7/93	7/93	7/93	7/93	7/93
Missouri	8/92	8/92	8/92	5/94	5/94	N/O*
Montana	12/93	12/93	1/94	12/93	12/93	2/94
Nebraska	11/92	11/92	7/93	11/92	11/92	7/93
Nevada	1/95	1/95	12/95	3/95	1/95	1/95
New Hampshire	11/94	1/93	11/95	11/94	1/93	3/96
New Jersey	3/93	11/92	12/95	3/93	11/92	1/97
New Mexico	10/92	10/92	10/94	9/94	1/93	11/95
New York	4/92	4/92	7/94	1/93	4/92	8/97
North Carolina	1/93	8/93	11/94	1/93	8/93	11/94

N/A Not applicable N/E Not established
N/O Not operational N/R No response

TABLE E-8
(Continued)

State	Review of documents for readability and/or content	Appointment/ hiring of staff/ election of officers	Review of SBO/SBAP outreach efforts	Review/ comment on proposed/ new regulations	Definition of CAP responsibilities	Attendance by CAP members at training sessions, etc.	Meeting with small business/ trade [illegible]	Other*
PA	X	X	X	X				X
PR						X		
RI	N/A							
SC		X						
SD							X	
TN	N/A							
TX	X	X	X	X	X	X	X	
UT	X		X					X
VT	X		X					
VA	X	X	X		X	X		
VI	None							
WA	X							
WV	X		X	X	X		X	
WI	X	X	X	X		X	X	
WY			X	X	X		X	X
TOTAL	28	19	28	21	23	16	14	6

N/A Not applicable N/O Not operational N/R No response

TABLE E-8
(Continued)

State	Review of documents for readability and/or content	Appointment/ hiring of staff/ election of officers	Review of SBO/SBAP outreach efforts	Review/ comment on proposed/ new regulations	Definition of CAP responsibilities	Attendance by CAP members at training sessions, etc.	Meeting with small businesses/ trade associations	Other*
Jeff. Cty	N/A							
LA	X	X	X	X	X	X	X	
ME	X		X	X	X			
MD	N/R							
MA	N/A**							
MI	X		X	X				
MN	N/A**							
MS			X	X			X	
MO		X						
MT	X		X	X	X	X	X	X
NE	X		X	X	X	X		
NV	X		X	X	X	X	X	
NH	X		X					
NJ			X	X	X	X	X	
NM	X	X						
NY	X	X**			X	X**		
NC	N/A**							
ND	X	X	X	X	X			
OH	X	X	X		X	X**	X**	
OK	X	X	X	X	X	X**		
OR	X	X	X	X	X	X	X	X

N/A Not applicable N/O Not operational N/R No response

TABLE E-8
MAJOR CAP ACTIVITIES

State	Review of documents for readability and/or content	Appointment/ hiring of staff/ election of officers	Review of SBO/SBAP outreach efforts	Review/ comment on proposed/ new regulations	Definition of CAP responsibilities	Attendance by CAP members at training sessions, etc.	Meeting with small businesses/ trade associations	Other*
AL	N/R							
AK	X	X		X	X			
AZ	N/R							
Maricopa Cty	N/R							
AR	X		X		X			
CA	N/R							
Kerns Cty	N/A							
South Coast	N/A**							
CO	X	X	X	X	X		X	X
CT	X	X	X		X	X	X	
DE	N/O**							
DC	N/O**							
FL			X		X			
GA	X	X	X	X	X	X		
HI	N/R							
ID	None							
IL	N/A							
IN				X		X		
IA	N/R							
KS	X	X	X	X	X			
KY	X	X	X		X			

N/A Not applicable N/O Not operational N/R No response

TABLE E-7
(Continued)

NJ	Permit forms and emissions inventory under development.
NC	Information available through links.
ND	Training courses, newsletters.
SD	Training courses.
VA	Access to EPA AIRS.
WY	Outreach information and contacts.

N/A Not applicable N/R No response

TABLE E-7
(Continued)

PROGRAM	INFORMATION AVAILABLE													
	Program Description	Contact Listings	Regulations	Permitting Info	Permit Forms	Emissions Inventory	Policies	Guidance Documents/ Fact Sheets	P2 Info	List of Publications	CAP Info	Calendar of Events	Links	Other*
Rhode Island		X	X	X			X					X		
South Carolina	X	X	X						X	X			X	
South Dakota	X	X	X	X	X									X
Tennessee	X	X	X	X	X		X	X				X	X	
Texas	X	X	X	X	X	X	X	X	X	X	X	X	X	
Utah	X	X	X	X	X				X				X	
Vermont	N/A													
Virginia	X	X	X	X	X	X*	X	X	X	X	X	X	X	
Virgin Islands	N/A													
Washington	X	X	X	X	X		X	X	X	X		X	X	
West Virginia	X	X		X	X							X	X	
Wisconsin	X	X										X	X	
Wyoming	X	X	X	X	X		X	X	X	X	X	X	X	X

*Notes & Other

Maricopa Cty, AZ Newsletters, pollution advisories, trip reduction program, MSDS guides.

South Coast, CA Business assistance, compliance education classes, clean air technologies.

CO Emissions inventory for Title V sources. P2 info available by reference to the P2 Program's page. CAP info will be added to SBO page in 1998.

IL List of IL consultants.

IN IN 5-Star Environmental Recognition Program for drycleaners - application and searchable database.

IA "What's New."

KS All printed documents may be downloaded including quarterly newsletter.

MA List of current and upcoming project areas, so that industry and environmental groups will have ability to plan to participate in projects that interest them.

MN Small Business Environmental Improvement Loan application forms.

MO Permit forms available on the regulatory program's home page.

NV Program description, contact listings, calendar of events, and links are specific to BEP-UNR activities and do not include information regarding the state SBAP, Ombudsman services, or the Washoe County or Clark County Air Programs. NV statutes and regulations can be accessed via the State of Nevada Legislative home page: www.leg.state.nv.us.

N/A Not applicable N/R No response

TABLE E-7
(Continued)

PROGRAM	INFORMATION AVAILABLE													
	Program Description	Contact Listings	Regulations	Permitting Info	Permit Forms	Emissions Inventory	Policies	Guidance Documents/ Fact Sheets	P2 Info	List of Publications	CAP Info	Calendar of Events	Links	Other*
Jefferson Cty			X											
Louisiana	X	X	X	X	X	X	X	X	X		X		X	
Maine	X	X	X				X	X	X				X	
Maryland	X	X		X	X		X	X	X	X			X	
Massachusetts	X	X	X link to MA/DEP	X link to MA/DEP	X link to MA/DEP	X link to MA/DEP	X	X	X	X		X	X	X
Michigan	X	X						X		X	X			
Minnesota	X	X	X	X	X	X	X	X	X	X		X	X	X
Mississippi	N/A													
Missouri	X			X	X*			X	X	X		X		
Montana	N/A													
Nebraska	N/A													
Nevada	X*	X*	X*					X*		X*		X*	X*	
New Hampshire	N/A													
New Jersey	X	X	X	X	*	*	X	X		X		X	X	
New Mexico	X		X	X	X		X	X		X				
New York	N/A													
North Carolina	X	X	X*	X	X*			X	X*	X*	X*	X	X	
North Dakota	X	X	X	X	X			X	X	X			X	X
Ohio	X	X	X	X	X		X	X	X				X	
Oklahoma	X	X	X	X				X	X		X	X	X	
Oregon		X	X					X	X	X			X	
Pennsylvania	X	X	X	X	X	X	X	X	X	X	X	X	X	
Puerto Rico	N/A													

N/A Not applicable N/R No response

TABLE E-7
(Continued)

TABLE E-9
INFORMATION ON SBTCP ELECTRONIC BULLETIN BOARDS OR WEB PAGES

PROGRAM	INFORMATION AVAILABLE													
	Program Description	Contact Listings	Regulations	Permitting Info	Permit Forms	Emissions Inventory	Policies	Guidance Documents/ Fact Sheets	P2 Info	List of Publications	CAP Info	Calendar of Events	Links	Other[a]
Alabama			X	X	X									
Alaska	X	X		X				X	X			X (ADEC page)	X	
Arizona	X	X		X		X		X	X	X			X	
Maricopa Cty	X	X	X	X	X	X		X	X	X		X	X	X
Arkansas	N/A													
California	X	X	X	X	X	X	X	X	X	X		X	X	
Kerns Cty	N/A													
South Coast	X		X	X	X	X	X	X		X	X	X	X	X
Colorado	X	X	X	X	X	X	X	X	X	X		X	X	
Connecticut	X	X	X	X			X	X	X	X			X	
Delaware	X	X	X	X			X	X	X	X		X	X	
District of Columbia	N/A													
Florida	X	X	X	X	X	X	X	X	X	X	X	X	X	
Georgia	X	X										X		
Hawaii	N/A													
Idaho	N/A													
Illinois	X	X	X	X	X			X	X				X	X
Indiana	X	X	X (IDEM & OAM)	X (IDEM & OAM)	X (OAM)	X (OAM)	X (IDEM & OAM)	X		X (IDEM & OAM)	X	X (IDEM & OAM)	X	X
Iowa	X	X								X		X	X	X
Kansas	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Kentucky	X	X	X	X	X	X	X	X	X	X	X		X	

N/A Not applicable N/R No response

TABLE E-7
(Continued)

Program	Bulletin Board or Web Page Address	Usage During Report Period	Comments Received
Washington	www.wa.gov/ecology www.wlm.com/~oapca/sba.html www.psapca.org/business.htm www.pacificrim.net/~nwapa/smbus.htm www.cascadiaweb.com/~cci/baqap.htm	N/R	N/R
West Virginia	wvnvm.wvnet.edu/~jmorgan/index.htm	N/A	Web site is an outgrowth of the OAQ electronic bulletin board and was not a public site until year's end. Therefore, we haven't received specific feedback on the site, but have received a lot of positive feedback on the overall SBAP program.
Wisconsin	badger.state.wi.us.agencies/commerce	N/R	N/A
Wyoming	deq.state.wy.us	N/A	The web page is fairly new, but has already started to generate interest and responses. Most often, it serves as a channel for questions about specific programs, which are referred to technical experts within the Department. There is also an increasing number of queries about statutes and regulations that are not available on other web pages within the state system. We are considering placing a hot link to those sites with the concurrence of the web masters for those products.

*Notes

CA During 1997, total bytes transferred from ARB by web users rose from 870,000 to over 3 billion.

IN Compliance and Technical Assistance Program (CTAP) additional sites:
5-Star Environmental Recognition Program for Drycleaners: www.ai.org/idem/oppta/cleaners/in5star.html
Mercury Fact Sheet: www.ai.org/idem/oppta/mercury/merfact.html
Business & Legislation: www.ai.org/idem/busleg/index.html
Community Relations: www.ai.org/idem/commrel/index.html
Agriculture Liaison: www.ai.org/idem/ag/index.html

IDEM continues to make documents available through the Small Business Development Center's Fax-On-Demand system. This system has a toll free number throughout IN and enables customers to quickly and easily order and receive documents via their fax machine.

NV Services are provided per contract by the BEP-UNR program. Clark County District Health also has a home page, which provides information regarding environmental permits and regulations, etc.

OR While the SBTCP does not have a home page, OR SBAP P2 and compliance sector guidance documents, fact sheets, and miscellaneous information sheets are available through the Seattle Pacific Northwest Pollution Prevention Resource Center at www.pprc.org/pprc. General information may be found at the Department of Environmental Quality site at www.deq.state.or.us.

RI Web page is department wide; SBAP is cited within the web page.

N/A Not applicable N/R No response

TABLE E-7
(Continued)

Program	Bulletin Board or Web Page Address	Usage During Report Period	Comments Received
South Dakota	www.state.sd.us/state/executive/denr/denr.html	N/A	A consultant sent the following message: "Thanks again for your help regarding the permitting process for the proposed soy bean processing facility that we are evaluating for our client. I also wanted to reiterate my comments regarding your web site and how useful it has been in providing permit guidance. I have yet to see another web page from another state that does such a thorough job in this regard. Our client is quite impressed also, which hopefully will lead to a significant project in South Dakota. We will keep you appraised of our progress. Thanks again for your assistance." An attorney told department personnel that our web page was great and was "one of the best sites" he had seen. He liked the ability to download important information from the page.
Tennessee	www.state.tn.us/environ	Unknown	Unknown. Some hotline calls have been received because persons have reviewed the web page and wanted additional information.
Texas	www.tnrcc.state.tx.us/exec/small_business/index.html	1,830	Comments indicate individuals became aware of program through the Internet -- specifically on the volunteer program (potential EnviroMentors).
Utah	www.eq.state.ut.us/eqair/sbap/sbap3.htm	Unknown	Comments received have been from consultants complaining about how long forms take to download. Positive comments have been received regarding the information included on the web site.
Vermont	N/A (planned for 1998)		
Virginia	www.deq.state.va.us/osba/smallbiz.html	2,300*	Received very positive comments from some users. For example: "Definitely a useful tool." "The information included on you web site is very useful to manufacturers of all sizes, not just small businesses. When I do Internet Resources training for environmental managers, I always go to your site as an example of a great resource." Site provides e-mail interface, which has not been utilized as much as would have been hoped. A portion of the comments, such as those above, have been provided as a result of other types of forums. It is important to note that the site is being developed under an EPA Leadership Grant, and one of the questions we hope to answer is concerning the usefulness of the resource.
Virgin Islands	N/A		

N/A Not applicable N/R No response

TABLE E-7
(Continued)

Program	Bulletin Board or Web Page Address	Usage During Report Period	Comments Received
Ohio	www.epa.ohio.gov/dapc/sba/sbaintro.html	N/A	Limited numbers of customers are using the home page. Just as last year, very few small businesses are using the Internet to access environmental information. However, the response of users has been very positive. Although the SBAP received no specific suggestions for the home page, in 1998, plan to install a counter to track hits, provide additional information, and advertise the home page as a confidential source of information. Hopefully, the home page will increase information transfer to small businesses while meeting their desire for confidentiality.
Oklahoma	www.deq.state.ok.us	1,300	Received general comments on the home page indicating that customers have found it quite helpful. Currently updating and expanding the page to include more information and make it more useful to customers. Adding more related links, forms, fact sheets, etc.
Oregon*	www.pprc.org/pprc www.deq.state.or.us (gen. info. only)	Unknown	Other SBAPs have downloaded some of the listed documents. The level of usage is unknown.
Pennsylvania	BBS: 800-864-7594 Web: www.dep.pa.state.us www.dep.state.pa.us/dep/deputate/pollprev/ombudsman/default.htm	N/R	No comments received. No feedback solicited.
Puerto Rico	N/A		
Rhode Island*	www.state.ri.us/dem	N/A	No responses specific to SBAP information on web site were received during 1997.
South Carolina	BBS: 803-734-4535 or 734-3752 Web: www.state.sc.us//dhec/sbap.htm	725	Several people have commented positively on information and links available on home page. Feedback usually is received through e-mail.

N/A Not applicable N/R No response

TABLE E-7
(Continued)

Program	Bulletin Board or Web Page Address	Usage During Report Period	Comments Received
Minnesota	www.pca.state.mn.us (SBTCP access via MPCA page)	1,000	Received positive comments from people who have used home page to learn about SBTCP services and the Small Business Environmental Improvement Loan Program. MPCA's home page provides an opportunity for users to provide comments directly back to SBTCP staff. Also solicit comments for customer's information needs (all media) via mailed surveys.
Mississippi	N/A		
Missouri	www.state.mo.us/dnr/deq/tap/hometap.htm	N/R	A few comments have been received indicating that the home page is liked and appreciated.
Montana	N/A		
Nebraska	N/A		
Nevada*	www.scs.unr.edu/nsbdc/bep.htm	N/A	No comments received regarding the BEP-UNR home page. Many NV SBAP contacts have expressed interest in accessing information through a State Division of Environmental Protection home page, including permit application forms, copies of regulations or policy documents, and staff contacts for various programs.
New Hampshire	N/A		
New Jersey	NJDEP BIS: 609-292-2006 Web: www.state.nj.us/commerce/caasbo.htm	BIS: 99 Web: 398	N/R
New Mexico	BBS: 505-827-152 Web: www.nmenv.state.nm.us	1,500	Received positive verbal comments on the availability of the BBS.
New York	N/A		
North Carolina	www.p2pays.org/osbo www.p2pays.org/epic	Unknown	Most often, clients sought information on financial assistance, how to start a business, or what kinds of permits would be needed for a planned operation rather than the environmental assistance offered by the SBAP. Changing web page to make environmental assistance more apparent.
North Dakota	www.ehs.health.state.nd.us	N/R	No comments received. No solicitation has been made.

N/A Not applicable N/R No response

TABLE E-7
(Continued)

Program	Bulletin Board or Web Page Address	Usage During Report Period	Comments Received
Indiana*	CTAP: www.ai.org/idem/ctap/ IDEM: www.ai.org/idem/ OAM: www.ai.org/idem/oam/	CTAP: 600 IDEM:21,082 OAM: 4,006	N/R
Iowa	www.state.ia.us/sbro/smbair.htm www.iwrc.org/IAEAP.htm	IWRC: 548/month	None received by SBO. IWRC web site recorded 548 user sessions per month. Average time spent at web site per user is over 11 minutes. On average, 12 different counties access IWRC site per month. Following are comments received from users: "Your site is very informative! Thanks very much!" "Great site and information !!!" "I appreciate your organization and enjoy the web site. Thanks."
Kansas	sbeap.niar.twsu.edu	2,179	No comments received.
Kentucky	gatton.gws.uky.edu/KentuckyBusiness/kbeap/kbeap.htm	809	KY Business Environmental Assistance Program (KBEAP) has received positive comments regarding the availability of information on the web site. There is a section for comments or suggestions from information users.
Jefferson Cty	www.apcd.org	Still under construction	So far, only Regulations appear on the web page. They were added first due to strong feedback from the community. There has been very positive feedback concerning the site. Other areas will be added as quickly as possible, as most requested by the community.
Louisiana	www.deq.state.la.us/oarp/sbap/sbap.htm	N/A	In a survey of small businesses, 3 out of 5 said that the Internet was a viable tool. They also wanted more plain English language regulations.
Maine	www.state.me.us/dep	N/A	No comments received. Not soliciting feedback at this time on the home page.
Maryland	www.mde.state.md.us	N/A	N/A
Massachusetts	BBS: 617-727-5621 Web: www.magnet@state.ma.us/ota/ota.htm	N/A	Yes.
Michigan	www.deq.state.mi.us/ead/eosect/caap	791	N/A

N/A Not applicable N/R No response

TABLE E-7
(Continued)

Program	Bulletin Board or Web Page Address	Usage During Report Period	Comments Received
Shasta Cty	www.dcn.davis.ca.us/~bluesky		
Siskiyou Cty			
SouthCoast	www.aqmd.gov	86	All comments on the home page are routed through the District's media office. Feedback specific to the Small Business portion of the home page is not readily available at this time. Overall, comments on the web page have been positive.
Tehama Cty	www.dcn.davis.ca.us/~bluesky		
Tuolumne Cty			
Ventura Cty			
Yolo-Solano	www.dcn.davis.ca.us/~ysaqmd		
Colorado	www.state.co.us/gov_dir/ap/aphom.html	Set up '97, active '98.	About 1,200 users on bulletin board in 1997. Phased out in 1998 and replaced by home page.
Connecticut	BBS: 860-424-4127 COM. Settings N81 Web: dep.state.ct.us	Web: 55,000	Users have requested additional information to be added. In general, the Department has received positive feedback.
Delaware	www.dnrec.state.de.us	Unknown	N/R
District of Columbia	N/A		
Florida	www.dep.state.fl.us/air	1,180	CAP suggested that the SBAP web page have the capability of recording the number of users who accessed the page. Also, they believe it would be easier for the viewer to read a document on the computer monitor instead of downloading the file and making a hard copy. Web now has the capability of counting hits. The user can adjust their Adobe Acrobat software to read the document instead of downloading.
Georgia	ganet.ganet.org/dnr/environ/branches/airprot/smallbiz.html	Unknown	No comments received.
Hawaii	N/A		
Idaho	N/A		
Illinois	www.commerce.state.il.us/dcca/menus/business/env-home.htm	1,000	Comments from users indicate their appreciation in being able to download permits from the web site.

N/A Not applicable N/R No response

TABLE E-7
SBTCP ELECTRONIC BULLETIN BOARDS OR WEB PAGES

In the first table, bulletin board/web page addresses, usage statistics, and comments/feedback from users are listed. In the second table, types of information accessible through the site are shown.

Program	Bulletin Board or Web Page Address	Usage During Report Period	Comments Received
Alabama	www.adem.state.al.us	N/R	N/R
Alaska	www.state.ak.us/local/akpages/ENV.CONSERV /dsps/compasst/cao_home.htm	No counter for page	No comments received.
Arizona	www.adeq.state.az.us	N/R	Feedback very positive to this point.
Maricopa Cty	www.maricopa.gov/envsvc/sbeap.htm	2,600	Survey or evaluation - both client evaluations and the home page ask for input on the page. These forms have just been changed or added, so do not have any feedback yet. Sample permit will be added very soon (auto, printers, dry cleaners, & dust control).
Arkansas	N/A		
California	www.arb.ca.gov	1,066,530*	Comments: "Many thanks for your offer of the particulates brochure. I would very much like to review this material. Please send a copy to:...P.S. With all this great service you [ARB] are providing, I am starting to feel good about paying my taxes." "Thank you for your prompt response. I have contacted that number and my questions have already been answered. If we could only bottle that quality of customer service and your courtesy and apply it world-wide, what a wonderful way of life. Thanks again."
Amador Cty			
Antelope Valley	www.mdaqmd.ca.gov		
Bay Area	www.baaqmd.gov		
Butte Cty	www.dcn.davis.ca.us/~bluesky		
Calaveras Cty			
Colusa Cty	www.dcn.davis.ca.us/~bluesky		
El Dorado Cty			

N/A Not applicable N/R No response

TABLE E-6
(Continued)

PROGRAM	SBO	SBAP
Oregon	800-452-4011 (S) 503-229-5778	800-452-4011 (S) 503-229-6147
Pennsylvania	717-772-8951	800-772-4743 (S)
Puerto Rico	N/R	787-767-7025
Rhode Island	800-932-1000 (S)	None
South Carolina	800-819-9001 (N) 803-734-5909	800-819-9001 (N) 803-734-2765
South Dakota	800-GET-DENR*	605-773-3351
Tennessee	800-734-3619 (N) 615-532-8012	800-734-3619 (N) 615-532-8012
Texas	800-447-2827 (N)	800-447-2827 (N)
Utah	N/R	800-270-4440 (N)
Vermont	None	800-974-9559 (S) 802-241-3745
Virginia	800-592-5482 (S) 804-698-4311	800-592-5482 (S) 804-698-4394
Virgin Islands	340-777-4577	340-777-4577
Washington	360-407-7018	800-622-4627 (S) 800-422-5623 x111 (S) 509-456-4727 360-438-8768 x111 360-407-6803
West Virginia	800-982-2474 (S) 304-558-1218	800-982-2474 (S) 304-558-1213
Wisconsin	800-435-7287 (N)	800-435-7287 (N)
Wyoming	307-777-7388	307-777-7347

*Notes:

SD 7 state access in area.

TABLE E-6
(Continued)

PROGRAM	SBO	SBAP
Iowa	800-351-4668 (N) 515-242-4761	800-422-3109 (N) 319-273-8905
Kansas	800-357-6087 (N)	800-578-8898 (S)
Kentucky	800-926-8111 (N)	800-562-2327 (N)
Jefferson Cty	None	
Louisiana	800-259-2890 (S)	800-259-2890 (S)
Maine	800-789-9802 (S)	800-789-9802 (S)
Maryland	800-633-6101 x4108 (S)	800-633-6101 xEPSC (S)
Massachusetts	617-727-3260	800-462-0444 (S) 617-727-3260
Michigan	None	800-662-9278 (N)
Minnesota	800-985-4247 (S) 612-297-8615	800-657-3938 (S) 612-282-6143
Mississippi	800-725-6112 (N)	800-725-6112 (N)
Missouri	573-751-3222	800-361-4827 (N) 573-526-6627
Montana	800-433-8773 (N)	800-433-8773 (N)
Nebraska	None	None
Nevada	800-992-0900 x4670 (S) 702-687-4670 x3162	800-992-0900 x4670 (S) 702-687-4670 x3164
New Hampshire	800-837-0656 (S)	800-837-0656 (S)
New Jersey	800-643-6090 (N)	609-292-3600
New Mexico	800-810-7227 (N) 505-827-9685	800-810-7227 (N) 505-827-9739
New York	800-STATE-NY (N) 212-803-2282/2283 (800-782-8369)	800-780-7227 (S) 518-457-9135
North Carolina	800-829-4841 (N)	800-829-4841 (N) EPIC: 888-268-2640 (N)
North Dakota	800-755-1625 (N)	800-755-1625 (N)
Ohio	800-225-5051 (S) 614-728-3540	614-644-4830
Oklahoma	405-271-8425	800-869-1400 (N)

TABLE E-6
(Continued)

PROGRAM	SBO	SBAP
North Coast		707-443-3093
Northern Sierra		530-274-9360
Northern Sonoma		707-433-5911
Placer Cty		530-889-7130
Sacramento Metro		916-386-6650
San Diego Cty		619-694-5106
San Joaquin Valley		209-497-1000
San Luis Obispo Cty		805-781-4AIR
Santa Barbara Cty		805-961-8868
Shasta Cty		530-225-5674
Siskiyou Cty		530-841-4029
South Coast	800-CUT-SMOG (S)	800-CUT-SMOG (S)
Tehama Cty		530-527-3717
Tuolumne Cty		209-533-5693
Ventura Cty		805-645-1412
Yolo-Solano		530-757-3650
Colorado	800-886-7689 (S) 303-692-2034	303-692-3175
Connecticut	800-760-7036 (S)	
Delaware	302-739-6400	302-739-6400
District of Columbia	202-645-6093	202-645-6093
Florida	850-414-8399	800-722-7457 (N)
Georgia	N/R	
Hawaii	N/R	
Idaho	208-373-0497	
Illinois	888-EPA-1996 (S)	800-252-3998 (S)
Indiana	800-451-6027 x2-8598 (S) 317-232-8598	800-451-6027 x2-8172 (S) 317-232-8172

TABLE E-6
HOTLINE INFORMATION

Accessibility of toll-free numbers are designated (N) for national or (S) for in-state only. This table also includes numbers for all of the Air Pollution Control Districts in California.

PROGRAM	SBO	SBAP
Alabama	800-533-2336 (N)	800-533-2336 (N)
Alaska	800-510-2332 (S) 907-269-7591	800-510-2332 (S) 907-269-7591
Arizona	800-234-5677 x4337 (S) 602-207-4333	800-234-5677 x4337 (S) 602-207-4333
Maricopa Cty		602-506-5150
Arkansas		
California	800-ARB-HLP2 (S)	
Amador Cty		209-223-6406
Antelope Valley		805-723-8070
Bay Area		415-749-4764
Butte Cty		530-891-2882
Calaveras Cty		209-754-6504
Colusa Cty		530-458-0590
El Dorado Cty		530-621-6662
Feather River		530-634-7659
Glenn Cty		530-934-6500
Great Basin		760-872-8211
Imperial Cty		760-339-4314
Kern Cty		805-862-5250
Lake Cty		707-263-7000
Lassen Cty		530-251-8110
Mariposa Cty		209-966-5151
Mendocino Cty		707-463-4354
Modoc Cty		530-233-6419
Mojave Desert		760-245-1661
Monterey Bay		408-647-9411

TABLE E-5
(Continued)

	One column written for KY Ready-Mixed Concrete Association Newsletter with circulation of 100. 10/97 - Division for Air Quality Requests Assistance from Kentucky Ready-Mixed Concrete Association
	Article published in Land, Air & Water with circulation of 13,000. "Clean Air Act Assistance is 'Good Service'"
Jefferson Cty, KY	As members of District Web Page panel, offered advice and submitted material designed to be understandable by the small business owner. Members of P2 Partnership of county environmental services and regulators. SBO designed RFP for SBTAP outside contractor and reviewed submissions.
LA	3 articles published in trade association newsletters. Other activities included: SBAP assisted permits with permitting reviews. SBAP participated in planning the SBO/SBAP annual conference. SBAP represents 5 states in Region 6 EPA in national SBAP matters. SBAP attended professional training courses -- permits, accident prevention, hazwoper refresher, hazardous waste, and solvent alternatives. Assisted in the development of the Best Management Practices Plan for shipbuilders. Assisted EPA in evaluating an organization to develop and operate a Chemical Industry Compliance Assistance Center.
MI	Data for FY October 1996-September 1997.
MN	1000 SBAP web page "hits" (exists as a sub-page of MPCA's home page).
MO	P2 assistance data included with Permit and Compliance Assistance data.
BEP-UNR	Totals include assistance from Small Quantity Generator Hazardous Waste Grant, which accounts for the majority of their program activities but are not ancillary to the CAP.
NJ	1 survey of trade associations for CAP. For P2 Assistance, Regulatory Overview, and Permit and Compliance Assistance categories, the number of services and persons reached are already included under the other categories.
NM	5 environmental assessments.
NY	SBO Brochures/Manuals/Info Packets: 5 industry-specific and an undetermined number of general info packages. SBAP Brochures/Manuals/Info Packets: 3 manuals and 19 fact sheets.
NC	675 general assistance by telephone, 22 referrals to other media for assistance = 697.
ND	A = Air; O = Water, RCRA, & Underground Storage Tanks combined; R = RCRA (hazardous waste); U = Underground Storage Tanks; W = Water (stormwater &NPDES discharge permits).
OH	SBO participated in OEPA Permit Advisory Group, 112R group, Ohio Chemical Council CARE awards review panel, Cuyahoga Community College Small Business Environmental Assistance Program. SBAP participates in the following OEPA workgroups: MACT Implementation, Permit and Enforcement Policy, 112R Implementation, Non-Title V Fee Program.
OR	Other: 1 article about aqueous cleaning as an alternative to perchloroethylene solvent, which was published in *Pollution Prevention Review magazine*, Autumn 1997 edition. General note: Incoming calls are not tracked as hotline (toll free), long distance, or local calls. During this reporting period, all small business services were performed by the SBAP.
RI	Data marked "*" represent total number of employees directly or indirectly affected. Other: 2 businesses received sales tax relief through the SBAP for using air pollution control equipment. Total number of employees affected equals 1090.
TX	Data for Meetings are included with Seminars, etc. Data for P2 Assistance included with On-site Visits. Data for Regulatory Overview and Permit and Compliance Assistance included with Hotline and On-site Visits.
VT	P2 is integrated into all Compliance Assistance Program activities.
VA	Produced and generated a closed-loop teleconference compliance workshop for Wood Furniture Manufacturers dealing with the Wood Furniture MACT. Partnering with the Manufacturing Technology Center located at Wytheville Community College, this was likely the first use of the Virginia Distance Learning Network for delivery of regulatory information to regulated facilities at selected Community College reception sites that geographically corresponded to the location of impacted facilities. The Network is a real-time, two-way interactive telecommunication system and provides the ability to use various types of presentation formats (overheads, computer-generated slides, 35mm slides, video tape, Internet, and remote broadcast). This was an excellent tool and an excellent workshop and was very well received. On 12/5/97, provided "Internet Web Site Development Training" to sister states and EPA in Region III. This activity was a deliverable of Leadership Grant. Representatives from EPA Region III, DC, and WV were present as well as the Compliance Advisory Board.
WV	36 conflict resolution meetings and calls, 38 financial inquiry calls, and 12 legislative meetings, all of which are for all media combined.
WI	Pam Christenson testified before the House subcommittee on HR96. ISO 14000 survey of Wisconsin businesses.
WY	SBO Other: Peer match and cross talks with Western State SBO/SBAP offices in CA, CO, NV, UT, and MT. SBAP Other: WESTAR SBAP.

TABLE E-5
(Continued)

Program	Number of Services Provided / Number of Businesses or Individuals Reached														
	Hotline Calls	On-site Visits	Seminars, Workshops, Speaking Events	Meetings	Brochures, Manuals, Information Packets	Newsletters	Mailings & Correspondence	P2 Assistance	Information Booths	Teleconferences	Press Releases & Media Coverage	Regulatory Overview	Permit & Compliance Assistance	Other*
Virgin Islands		50/50	5/5		50/50		3587/3587	75/75			10/10		5/5	
Washington	--/15940	--/3666	17/519	73/--	25/2058	8/2900	4/200	--/1962	15/500	4/--			--/2737	
West VirginiaSBO	10/10	12/12	15/370	30/160	8/45		25/85	15/15	3/210			24/24	60/60	86/--
SBAP	170/148	44/30	4/150	33/33			121/90		1/50		2/150			
Wisconsin	1108/1108	32/32	62/3710	115/1158	--/27185	4/4800	--/2005	12/12	4/1850	3/320	15/--		--/811	2/800
Wyoming SBO	157/157	22/87	12/233	7/85	42/12000	1/5000	17/357	55/200	2/250	6/75	42/1000s	11/250	17/17	6/40
SBAP	60/60	1/75	4/750	20/175	5/3355	1/5000	5/300	4/4	1/200	5/40	2/--	2/2	25/41	3/20
TOTAL*														

Totals do not reflect answers such as, "yes." Figures such as 500+ are tallied as 500.

*Notes:

Maricopa County, AZ — Internet home page - approximately 50 hits per week (rules, newsletters, guides, survey, etc.).

South Coast, CA — *Other - Variances, language translations, financial.*

CO — The Ombudsman was moved by CO Statute from the Office of Regulatory Reform to the CO Department of Public Health and Environment as of July 1, 1997. Records from the previous office are not available, because the entire office was dissolved. The new Ombudsman did not begin office until December 1, 1997.

GA — *200 drycleaning videos distributed.*

IA — SBO and SBAP: radio interviews.

KS — SBO: assisted businesses in determining if they already had a permit; status of permits (application received, on file, etc.).
SBAP: 2749 web site visits.

KY — SBO Other: technical assistance by phone.
SBO and SBAP Media Coverage: circulation estimate for statewide distribution.

Publications prepared by KY Business Environmental Assistance Program:

Brochure - Air Quality Check-Up
Newsletter - "BEAP BEAP" Vol. 2, No. 1, Spring 1997

Publications prepared by Air Quality Representative for Small Business:

Five columns written and distributed to 12 state newsletters with circulation of 415,000 per mailing.
2/97 - Interview with Air Quality Division Director
3/97 - What's Ahead for Small Businesses?
6/97 - Description of Permitting by Minerals Section, Division for Air Quality
9/97 - Information on Web Sites
11/97 - Title V Information

TABLE E-5
(Continued)

Program	Number of Services Provided / Number of Businesses or Individuals Reached													
	Hotline Calls	On-site Visits	Seminars, Workshops, Speaking Events	Meetings	Brochures, Manuals, Information Packets	Newsletters	Mailings & Correspondence	P2 Assistance	Information Booths	Teleconferences	Press Releases & Media Coverage	Regulatory Overview	Permit & Compliance Assistance	Other*
Ohio SBO	312/250	3/18	5/125	185/280	5/2000	1/4000	175/4775	15/20	3/300		25/ 643603	yes		
SBAP	1280/1000	208/198	22/330	20/20	12/4000	4/16000	270/500	yes	2/--			yes	260/198	
Oklahoma	1040/1040	25/25	11/160	12/23	3/--		1300/1300		3/52	2/20			650/650	
Oregon SBO														
* SBAP		12/12	7/326	47/437	102/346	2/452	578/578	38/38	1/100	1/9	2/111	3/3	135/135	1/1
PennsylvaniaSBO		yes	yes	yes	yes		yes	yes	yes		yes	yes	yes	
SBAP	1043/550	11/11	7/150	4/400	4/7400	4/4800	1/830							
Puerto RicoSBO														
SBAP	yes	yes	yes	yes	yes		yes						yes	
Rhode IslandSBO			1/25	95/250										350/350
SBAP		22/278*	7/331	2/8	4/300	4/14000		119/4638*		1/25			49/2711*	23/23 2/1090*
South Carolina	992/992	25/35	22/1357	50/100		5/3350	78/78	65/65	5/1172		500/ 500+	567/600	133/150	
South Dakota		12/12	1/30	1/30			1/15						6/313	
Tennessee	420/420	110/110	105/2300	86/611	7/800	6/16000	1900/1900	110/110	5/530	1/50	4/270	2300/ 2300		
Texas*	3175/3175	118/118	77/2293		19/--	5/17760	18/21741		2/1500					
Utah SBO	25/25		1/15	26/65			20/20		1/100					
SBAP	20/20	50/50	7/130	20/30	240/240	2200/1800	2400/2000	5/10		2/20		10/10	220/220	
Vermont SBO														
SBAP	74/74	9/9	8/135		2000/2000	1/1200	10/10	*	2/1700		2/3000	9/9	9/9	
Virginia SBO	yes		3/450	6/63			yes	yes				yes	yes	
SBAP	320/320	1/1	15/357	53/--	yes		yes	yes	2/600	2/75*	2/20000	yes	yes	2/47

TABLE E-5
(Continued)

Program	Number of Services Provided / Number of Businesses or Individuals Reached													
	Hotline Calls	On-site Visits	Seminars, Workshops, Speaking Events	Meetings	Brochures, Manuals, Information Packets	Newsletters	Mailings & Correspondence	P2 Assistance	Information Booths	Teleconferences	Press Releases & Media Coverage	Regulatory Overview	Permit & Compliance Assistance	Other*
Mississippi	1800/1800	7/7	33/633	9/5500	10000/ 10000	58000/ 58000	24000/24000	49/6000	10/10000	1/45	414/ 50000	49/6000	49/6000	
Missouri SBO														
SBAP	1671/1671	73/73	30/742	38/38	2/--	4/--	251/--	•	10/--				1744/1744	
Montana	216/216	98/98	7/350	30/240	5/1000		10/2000	75/300		2/50	2/--	3/50	150/300	
Nebraska		70/70	23/1301	33/724	4/4146				2/3000+	1/25			70/70	
Nevada	285/285	67/67	12/200	29/56	4/404		740/740	15/25		8/89		4/10	70/107	
Washoe Cty	80/80	60/60	5/125	10/100	2/400		30/30	5/5	2/300		10/--	10/10	800/800	
Clark Cty			20/600		300/300		1500/1500		3/250					
BEP-UNR*	1222/1222	46/46	20/1200	30/600	9/3000	3/3500	500/4000		2/1200		12/ 500000	14/20	870/907	
New Hampshire	733/586	129/129	9/450	yes	500+/ 500+	2/6000	yes	yes	yes	4/45		yes	yes	
New JerseySBO	107/107		2/80	1/35										
SBAP	384/384		8/600	8/180	1000/1000	2/260	250/250	•	4/800	1/20	1/2000	•	•	1/30
New MexicoSBO														
SBAP		25/25	14/280	32/--	15/450		30/1247	5/--	2/--	4/--		3/--	33/--	5/--
New York SBO	391/391		43/3204	51/--	5/10167* --/391*	2/5000	2/5000		10/6000+	1/--	6/--		52/52	
SBAP	1226/1226	33/33	21/1640	18/--	22/--*				2/3000+	1/--			217/217	
North Carolina	959/959	45/45	12/1120	25/240	30/50		110/1101	•	2/500	2/50		41/--	80/80	697/697
North Dakota*	A60/60 O180/180	A1/1 R50/50 W12/12 U90/90	A1/75 R8/200 W15/2500 U5/125	W3/300	A6/215 R2500/ 2500 W3/100 U950/950	A1/50 R4/900 W2/400 U1/900	A1000/1000 U500/500	R200/200	W6/5000	A3/10	W2/-- U2/--		A6/6 R250/250 W4/4 U250/250	

TABLE E-5
(Continued)

Program		Number of Services Provided / Number of Businesses or Individuals Reached													
		Hotline Calls	On-site Visits	Seminars, Workshops, Speaking Events	Meetings	Brochures, Manuals, Information Packets	Newsletters	Mailings & Correspondence	P2 Assistance	Information Booths	Teleconferences	Press Releases & Media Coverage	Regulatory Overview	Permit & Compliance Assistance	Other*
Illinois	SBO	185/185			50/200					3/300				40/40	
	SBAP	586/586		51/1361	49/343	603/20630	34/--	23/20000	12/12	11/7300	1/70		10/500	102/102	790/790
Indiana	SBO														
	SBAP	3471/3200	147/138	24/565	42/119	9/3379	5/20000	225/225	220/200	2/150		2/state of IN		4/4	
Iowa	SBO	256/256	3/6	11/2000	20/100	2/5000	6/12000	2/5000		3/300	3/--		3/--	256/256	2/10000
	SBAP		126/126	21/1179	43/--	3/--	4/6500			2/--	10+/--			1317/1317	1/5000
Kansas	SBO	175/165		4/225	32/--	8/8000	4/2500	150/150		3/225	1/--	3/--			5/5
	SBAP	227/227	42/42	10/498	10/100	--/24156	4/25000			4/--	3/76	2/--			2179/ 2179
Kentucky	SBO	16/16	21/40	10/630	46/367			24/24		2/200	1/10	7/ 2090850*	7/92	1/40	8/--
	SBAP	yes	52/52	13/202	19/1323	9/2000	1/4000	18/8000		6/1100	1/1	5/ 2090850*	24/155	76/76	
Jefferson County			26/26	4/225	15/--	1/200	2/1200	2/30	122/122		9/6		24/--	25/25	*
Louisiana		yes	419/--	30/546	9/--	1/--	4/2200			4/400				419/419	3/--
Maine	SBO	12/--		3/--											
	SBAP	115/115	22/22	5/120		2/1200		128/128	45/45	7/2020		1/1		81/81	
Maryland	SBO														
	SBAP	105/105	1/1	14/65	10/45	500/650	500/750	500/600	25/50	3/250				35/35	
Massachusetts			302/--												
Michigan	SBO	275/275	15/15	12/12	100/100	20/20		50/50							
*	SBAP	959/959	49/49	14/1230	Inc. in on-site	237/237		119/119				2/2		896/896	
Minnesota	SBO	480/480	20/20	1/--	24/--	2/250	1/350	yes		6/--	1/--				
	SBAP	1967/1967	45/45	49/--	48/--	6/2050	4/4000	yes	yes	12/--	6/--	22/87500			1/1000

TABLE E-5
OUTREACH ACTIVITIES

Programs may tally their statistics separately for their SBO and SBAP, or they may combine their statistics for both functions. Programs that tally their statistics separately are indicated. "Other" activities are described in the Notes section below.

Program	Number of Services Provided / Number of Businesses or Individuals Reached													
	Hotline Calls	On-site Visits	Seminars, Workshops, Speaking Events	Meetings	Brochures, Manuals, Information Packets	Newsletters	Mailings & Correspondence	P2 Assistance	Information Booths	Teleconferences	Press Releases & Media Coverage	Regulatory Overview	Permit & Compliance Assistance	Other*
Alabama SBO	1180/1180		16/1080		2/500		25/25							
SBAP			4/150	6/35		2/200	4/800		2/150			5/30	39/39	
Alaska	562/562	16/16	18/914	61/161	8/267	4/13000	41/--	247/247	1/10		2/--	3/298	208/208	
Arizona	780/780	12/12	48/1800		10/7000	3/12000		24/24	5/1000	2/160	5/--		63/63	
Maricopa Cty	700/700	95/95	6/90	15/75	2/--	2/7000	65/312	115/130			2/--	2/--	115/115	2600/--
Arkansas		50/50	1/74	5/80	1/100		8/700	8/8	1/300			3/60	8/8	
California	5277/5277	2780/3200+	200+/--		10000+/ 16000+		150+/--		50/25000+			500+/ 500+	1500+/ 1500+	
Kerns Cty		93/--			--/69					--/56				
South Coast	1924/1927	179/179	10/10000	44/160	5000/--		25/25	47/23000	23/15300			415/415	537/537	430/430
Colorado SBO*														
SBAP	1900/1900	80/80	8/350	40/400	1/900		150/150	60/60	1/30	5/40			1300/1300	
Connecticut	350/350	15/15	31/980	20/1200	1500/1500	1/1000	30/13724	yes/50	yes/300		3/--	yes/1200	yes/50	
Delaware	180/--	30/--	10/--	yes	100/--								30/--	
District of Columbia*	20/20	40/40	1/200+		--/40									
Florida	208/208	2/2	6/120	20/200	831/831		46/46	3/3	1/--	3/--		1/1	50/50	
Georgia	450/450	6/7	20/300	70/200	12/10000	2/7000	20/20	11/11		2/30	1/1000	2/300	13/13	200/400
Hawaii	N/R													
Idaho SBO	yes		yes	yes			yes	yes	yes	yes				
SBAP	yes			yes			yes	yes					yes	

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL
WV	Asphalt	1		1
WV	Attorney/Consultant/Engineer	17		17
WV	Auto/Motor Vehicle Dealers & Equipment	8		8
WV	Concrete/Aggregate	16	1	17
WV	Crushed Stone Products/Sand & Gravel	2		2
WV	Dry Cleaners/Laundry Services	64	37	101
WV	Electroplating/Chrome Plating	18		18
WV	Manufacturing, Misc.	19	2	21
WV	Other	44	10	54
WV	Plumbing/HVAC	1		1
WV	Printing/Graphic Arts	1		1
WV	Sawmills/Logging/Wood Products	15	3	18
WY	Agriculture/Farming/Crop Services	3	1	4
WY	Asbestos/Remediation	1		1
WY	Asphalt	1		1
WY	Auto/Body Maintenance, Repair, Refinishing	31	7	38
WY	Concrete/Aggregate	1	1	2
WY	Construction/Contractor	3	4	7
WY	Dry Cleaners/Laundry Services		1	1
WY	Electroplating/Chrome Plating	1		1
WY	Food/Beverage Products & Processing		3	3
WY	Foundry/Smelter, Forging, Casting	1	1	3
WY	Government	3	2	5
WY	Hospitals/Medical Health Services	12	4	16
WY	Leather/Fur		1	1
WY	Mining (Metal & Coal)	6	3	9
WY	Paints & Painting/Coatings	2	1	3
WY	Petroleum/Gas Products/Storage/Pipelines	3	4	7
WY	Plumbing/HVAC	6		6
WY	Printing/Graphic Arts	1	3	4
WY	Recycling		2	2
WY	Repair, Misc.		2	2
WY	Sawmills/Logging/Wood Products	4	5	9
WY	Utilities	1	1	2
Yolo Solano, CA	Auto/Body Maintenance/Repair/Refinishing	10	10	20
Yolo Solano, CA	Dry Cleaners/Laundry Services		19	19
Yolo Solano, CA	Gasoline Distribution (wholesale/retail)	20	35	55
Yolo Solano, CA	Other	60	40	100

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL
VA	Utilities	3		3
Ventura Cty, CA	Other	60	20	80
VI	Auto/Body Maintenance, Repair, Refinishing	10	10	20
VI	Construction/Contractor	6	6	12
VI	Dry Cleaners/Laundry Services	16		16
VI	Gasoline Distribution (wholesale/retail)	20	20	40
VI	Paints & Painting/Coatings	10	10	20
VI	Plastics Manufacturing/Products	2	2	4
VI	Plumbing/HVAC	5	5	10
VI	Printing/Graphic Arts	15	8	23
VT	Auto/Motor Vehicle Dealers & Equipment	2	1	3
VT	Boat Manufacturing		1	1
VT	Construction/Contractor	1		1
VT	Food/Beverage Products & Processing	3		3
VT	Foundry/Smelter, Forging, Casting	3	1	4
VT	Furniture Manufacturing/Repair/Wood Finishing		1	1
VT	Printing/Graphic Arts		1	1
VT	Recreation Products & Services	1		1
VT	Textiles & Apparel		1	1
VT	Transport Services		1	1
WA	Auto/Body Maintenance, Repair, Refinishing	6		6
WA	Boat Manufacturing	3		3
WA	Dry Cleaners/Laundry Services	2		2
WA	Electroplating/Chrome Plating	2		2
WA	Gasoline Distribution (wholesale/retail)	27		27
WA	Landfill/Landfill Gas	1		1
WA	Mining (Metal & Coal)	1		1
WA	Other	2		2
WA	Paper Manufacturing & Products	1		1
WA	Plastics Manufacturing/Products	2		2
WI	Attorney/Consultant/Engineer	156		156
WI	Auto/Body Maintenance, Repair, Refinishing	110		110
WI	Chemicals/Products	6		6
WI	Dry Cleaners/Laundry Services	31	3	34
WI	Electroplating/Chrome Plating	16	1	17
WI	Food/Beverage Products & Processing	9	1	10
WI	Foundry/Smelter, Forging, Casting	4	1	5
WI	Furniture Manufacturing/Repair/Wood Finishing	45	3	48
WI	Government	121		121
WI	Hospitals/Medical Health Services	3	1	4
WI	Manufacturing, Misc.	165	3	168
WI	Metal Fabricating/Finishing	28	2	30
WI	Mining (Metal & Coal)	22		22
WI	Organizations/Associations	62		62
WI	Other	1,105	1	1,106
WI	Printing/Graphic Arts	79	3	82
WI	Transport Services	5	4	9
WI	Utilities	3	1	4

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS GENERAL	ON-SITE	TOTAL
TN	Electroplating/Chrome Plating	31	3	34
TN	Furniture Manufacturing/Repair/Wood Finishing	1,200	21	1,221
TN	Government	79		79
TN	Metal Fabricating/Finishing	52	4	56
TN	Other	166	46	212
TN	Plumbing/HVAC	21	7	28
TN	Printing/Graphic Arts	400	15	415
TN	Recycling	113		113
TN	Schools	25		25
Tuolumne, CA	N/R			
TX	Auto/BodyMaintenance, Repair, Refinishing	368	24	392
TX	Chemicals/Products	39	1	40
TX	Dry Cleaners/Laundry Services	167	40	207
TX	Foundry/Smelter, Forging, Casting	96	3	99
TX	Metal Fabricating/Finishing	180	2	182
TX	Other	2,091	29	2,120
TX	Printing/Graphic Arts	31		31
TX	Sawmills/Logging/Wood Products	203	19	222
UT	Auto/BodyMaintenance, Repair, Refinishing	17		17
UT	Concrete/Aggregate	18	1	19
UT	Dry Cleaners/Laundry Services	4		4
UT	Electroplating/Chrome Plating	24	4	28
UT	Furniture Manufacturing/Repair/Wood Finishing	60	6	66
UT	Manufacturing, Misc.	295		295
UT	Printing/Graphic Arts	30		30
VA	Agriculture/Farming/Crop Service	4		4
VA	Attorney/Consultant/Engineer	10		10
VA	Auto/Body Maintenance, Repair, Refinishing	5		5
VA	Auto/BodyMaintenance, Repair, Refinishing	4		4
VA	Chemicals/Products	27		27
VA	Construction/Contractor	1		1
VA	Degreasers	3		3
VA	Dry Cleaners/Laundry Services	73		73
VA	Electroplating/Chrome Plating	4		4
VA	Food/Beverage Products & Processing	2		2
VA	Foundry/Smelter, Forging, Casting	6		6
VA	Furniture Manufacturing/Repair/Wood Finishing	41		41
VA	Grains/Grain Elevator	1		1
VA	Hospitals/Medical Health Services	5		5
VA	Incinerators	5		5
VA	Machine Shops	1	1	2
VA	Manufacturing, Misc.	1		1
VA	Other	105		105
VA	Plastics Manufacturing/Products	1		1
VA	Printing/Graphic Arts	10		10
VA	Research & Testing Facilities/Laboratories	1		1
VA	Sawmills/Logging/Wood Products	4		4
VA	Textiles & Apparel	3		3

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL
San Joaquin, CA	Other	244	4	248
San Joaquin, CA	Paints & Painting/Coatings	129	1	130
San Joaquin, CA	Paper Manufacturing & Products	80	5	85
San Joaquin, CA	Petroleum/Gas Products/Storage/Pipelines	119		119
San Joaquin, CA	Plastics Manufacturing/Products	16		16
San Joaquin, CA	Printing/Graphic Arts	37	5	42
San Joaquin, CA	Sawmills/Logging/Wood Products	60	1	61
San Luis Obispo, CA	Auto/Body Maintenance/Repair/Refinishing	10	14	24
San Luis Obispo, CA	Boilers	3	9	12
San Luis Obispo, CA	Dry Cleaners/Laundry Services	2	5	7
San Luis Obispo, CA	Gasoline Distribution (wholesale/retail)	65	50	115
San Luis Obispo, CA	Metal Fabricating/Finishing	1	4	5
San Luis Obispo, CA	Other	42	36	78
San Luis Obispo, CA	Printing/Graphic Arts	1	2	3
Santa Barbara, CA	Asbestos/Remediation	3		3
Santa Barbara, CA	Attorney/Consultant/Engineer	15		15
Santa Barbara, CA	Auto/Body Maintenance/Repair/Refinishing	2		2
Santa Barbara, CA	Chemicals/Products	15		15
Santa Barbara, CA	Communications	1		1
Santa Barbara, CA	Dry Cleaners/Laundry Services	2		2
Santa Barbara, CA	Engines & Turbines	1		1
Santa Barbara, CA	Gasoline Distribution (wholesale/retail)	9		9
Santa Barbara, CA	Government	23		23
Santa Barbara, CA	Other	28		28
Santa Barbara, CA	Petroleum/Gas Products/Storage/Pipelines	5		5
Santa Barbara, CA	Private Citizens	127		127
SC	Chemicals/Products	1		1
SC	Concrete/Aggregate	4		4
SC	Cotton Gins	3	1	4
SC	Dry Cleaners/Laundry Services	28		28
SC	Manufacturing, Misc.	11		11
SC	Other	121	15	136
SC	Saw Mills/Logging/Wood Products	3	2	5
SC	Textiles & Apparel	2		2
SD	Aerospace	132		132
SD	Chemicals/Products	10		10
SD	Dry Cleaners/Laundry Services		10	10
SD	Electroplating/Chrome Plating		2	2
SD	Furniture Manufacturing/Repair/Wood Finishing	1		1
SD	Landfills/Landfill Gas	160	1	161
South Coast, CA	Auto/Body Maintenance/Repair/Refinishing	300	100	400
South Coast, CA	Dry Cleaners/Laundry Services	50	10	60
South Coast, CA	Electroplating/Chrome Plating	15	10	25
South Coast, CA	Gasoline Distribution (wholesale/retail)	10	2	12
South Coast, CA	Printing/Graphic Arts	100	20	120
South Coast, CA	Sawmills/Logging/Wood Products	30	30	60
TN	Auto/BodyMaintenance, Repair, Refinishing	13	9	22
TN	Dry Cleaners/Laundry Services	200	5	205

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL
PA	Manufacturing, Misc.	13	1	14
PA	Metal Fabricating/Finishing	70	2	72
PA	Mining (Metal & Coal)	1		1
PA	Organizations/Associations	31		31
PA	Other	87		87
PA	Paper Manufacturing & Products	10		10
PA	Personal Services	24		24
PA	Petroleum/Gas Products/Storage/Pipelines	23		23
PA	Printing/Graphic Arts	6		6
PA	Repair, Misc.	9		9
PA	Restaurants	2		2
PA	Retail/Wholesale Trade	23		23
PA	Rubber Manufacturing/Products	11	1	12
PA	Sawmills/Logging/Wood Products	16	1	17
PA	Schools	14		14
PA	Stone/Clay/Glass	12		12
PA	Textiles & Apparel	7		7
PA	Transport Services	9		9
PA	Transportation Equipment	6	1	7
PA	Utilities	10		10
PR	Auto/Body Maintenance, Repair, Refinishing	50	30	80
PR	Dry Cleaners/Laundry Services	50	20	70
PR	Other	30	15	45
PR	Printing/Graphic Arts	10	5	15
RI	Auto/BodyMaintenance, Repair, Refinishing	35	18	53
RI	Boat Manufacturing	2		2
RI	Electroplating/Chrome Plating	3	3	6
RI	Foundry/Smelter, Forging, Casting	1	2	3
RI	Furniture Manufacturing/ Repair/Wood Finishing		1	1
RI	Hotels/Motels	45		45
RI	Manufacturing, Misc.		4	4
RI	Other	31	11	42
RI	Plastics Manufacturing/Products	2		2
RI	Printing/Graphic Arts	59	2	61
Sacramento, CA	Other			385
San Joaquin, CA	Attorney/Consultant/Engineer	150		150
San Joaquin, CA	Auto/Body Maintenance/Repair/Refinishing	130	5	135
San Joaquin, CA	Boat Manufacturing	4		4
San Joaquin, CA	Concrete/Aggregate	35		35
San Joaquin, CA	Construction/Contractor	79	2	81
San Joaquin, CA	Crushed Stone Products/Sand & Gravel	21		21
San Joaquin, CA	Dry CleanersLaundry Services	37		37
San Joaquin, CA	Electronics/Electric Equipment & Repair	9		9
San Joaquin, CA	Food/Beverage Products & Processing	228	3	231
San Joaquin, CA	Gasoline Distribution (wholesale/retail)	219	6	225
San Joaquin, CA	Government	101	4	105
San Joaquin, CA	Grains/Grain Elevators	135	5	140
San Joaquin, CA	Metal Fabricating/Finishing	15	1	16

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS GENERAL	ON-SITE	TOTAL
OH	Foundry/Smelter, Forging, Casting	4	4	8
OH	Gasoline Distribution (wholesale/retail)	7	2	9
OH	Grains/Grain Elevators	2	2	4
OH	Machine/Equipment Manufacturing/Repair	34	12	46
OH	Metal Fabricating/Finishing	32	20	52
OH	Organizations/Associations	18		18
OH	Other		17	17
OH	Printing/Graphic Arts	10	4	14
OH	Rubber Manufacturing/Products	5	5	10
OH	Sawmills/Logging/Wood Products	18	15	33
OH	Schools	1		1
OH	Stone/Clay/Glass	9	12	21
OK	Auto/Body Maintenance, Repair, Refinishing		5	5
OK	Electronics/Electric Equipment/Repair		1	1
OK	Electroplating/Chrome Plating	10	1	11
OK	Foundry/Smelter, Forging, Casting	9		9
OK	Metal Fabricating/Finishing	52	9	61
OK	Other	1,040		1,040
OK	Paints & Painting/Coatings	1	1	2
OK	Petroleum/Gas Products/Storage/Pipelines	11		11
OK	Plastics Manufacturing/Products		2	2
OK	Printing/Graphic Arts	22	2	24
OK	Sawmills/Logging/Wood Products	10	4	14
OK	Stone/Clay/Glass	7		7
OK	Utilities	3		3
OR	Auto/Body Maintenance, Repair, Refinishing	6		6
OR	Degreasers	8	1	9
OR	Dry Cleaners/Laundry Services	9		9
OR	Electroplating/Chrome Plating	4		4
OR	Furniture Manufacturing/Repair/Wood Finishing	22	2	24
OR	Recycling	24		24
PA	Agriculture/Farming/Crop Service	2		2
PA	Analytical/Medical Instruments	3		3
PA	Auto/Body Maintenance, Repair, Refinishing	35	1	36
PA	Business Services	17		17
PA	Chemicals/Products	38		38
PA	Communications	1		1
PA	Construction/Contractor	20		20
PA	Electronics/Electric Equipment/Repair	10	1	11
PA	Food/Beverage Products& Processing	39	1	40
PA	Foundry/Smelter, Forging, Casting	10		10
PA	Furniture Manufacturing/Repair/Wood Finishing	24	2	26
PA	Gasoline Distribution (wholesale/retail)	7		7
PA	Government	1		1
PA	Hospitals/Medical Health Services	6		6
PA	Hotels/Motels	1		1
PA	Leather/Fur	1		1
PA	Machine/Equipment Manufacturing & Repair	51		51

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS GENERAL	ON-SITE	TOTAL
NV	Real Estate	10		10
NV	Recreation Products/Services	10	1	11
NV	Recycling	7	2	9
NV	Repair, Misc.	2		2
NV	Retail/Wholesale Trade	4		4
NV	Stone/Clay/Glass	2		2
NV	Transit (passenger)	1		1
NV	Transport Services	2		2
NV	Utilities	5		5
NY	Asphalt	10		10
NY	Attorney/Consultant/Engineer	269		269
NY	Auto/Body Maintenance, Repair, Refinishing	188	1	189
NY	Business Services	3		3
NY	Construction/Contractor	8		8
NY	Dairy/Feedlots/Livestock	3		3
NY	Degreaser	19		19
NY	Dry Cleaners/Laundry Services	211	16	227
NY	Electronics/Electric Equipment/Repair	20		20
NY	Electroplating/Chrome Plating	39	2	41
NY	Food/Beverage Products & Processing	11	1	12
NY	Foundry/Smelter, Forging, Casting	2		2
NY	Gasoline Distribution (wholesale/retail)	47		47
NY	Government	66		66
NY	Hospitals/Medical Health Services	1		1
NY	Incinerators	50		50
NY	Leather/Fur	1		1
NY	Machine Shop	6		6
NY	Manufacturing, Misc.	85	5	90
NY	Metal Fabricating/Finishing	9	1	10
NY	Organizations/Associations	78		78
NY	Other	150		150
NY	Paints & Painting/Coatings	167	6	173
NY	Personal Services	2		2
NY	Petroleum/Gas Products/Storage/Pipelines	10	1	11
NY	Pharmaceutical	5		5
NY	Plastics Manufacturing/Products	19		19
NY	Printing/Graphic Arts	89		89
NY	Private Citizens	30		30
NY	Repair, Misc.	4		4
NY	Research & Testing Facilities/Laboratories	6		6
NY	Retail/Wholesale Trade	2		2
NY	Textiles & Apparel	1		1
NY	Transport Services	2		2
NY	Utilities	4		4
OH	Attorney/Consultant/Engineer	2		2
OH	Auto/Body Maintenance, Repair, Refinishing	17	14	31
OH	Chemicals/Products	3	2	5
OH	Dry Cleaners/Laundry Services	85	85	170

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL
NJ	Pharmaceuticals	3		3
NJ	Plastics Manufacturing/Products	26		26
NJ	Plumbing/HVAC	14		14
NJ	Printing/Graphic Arts	26		26
NJ	Real Estate	2		2
NJ	Repair, Misc.	1		1
NJ	Research & Testing Facilities/Laboratories	2		2
NJ	Restaurants	5		5
NJ	Sawmills/Logging/Wood Products	1		1
NJ	Schools	12		12
NJ	Stone/Clay/Glass	2		2
NJ	Transport Services	1		1
NM	Concrete/Aggregate	1		1
NM	Construction/Contractor	2	1	3
NM	Crushed Stone Products/Sand & Gravel	6	2	8
NM	Dry Cleaners/Laundry Services	11	3	14
NM	Electronics/Electric Equipment/Repair	1	1	2
NM	Foundry/Smelter, Forging, Casting	1	1	2
NM	Manufacturing, Misc.	6	1	7
NM	Petroleum/Gas Products/Storage/Pipelines	3	1	4
NM	Sawmills/Logging/Wood Products	354		354
NV	Agriculture/Farming/Crop Service	2	1	3
NV	Asbestos/Remediation	2		2
NV	Attorney/Consultant/Engineer	61		61
NV	Auto/Body Maintenance, Repair, Refinishing	8		8
NV	Auto/Motor Vehicle Dealers & Equipment	21	10	31
NV	Business Services	4		4
NV	Construction/Contractor	24	8	32
NV	Crushed Stone Products/Sand & Gravel	11	7	18
NV	Dry Cleaners/Laundry Services	19	12	31
NV	Electronics/Electric Equipment/Repair	1		1
NV	Electroplating/Chrome Plating	3		3
NV	Foundry/Smelter, Forging, Casting	1		1
NV	Furniture Manufacturing/Repair/Wood Finishing	1		1
NV	Gasoline Distribution (wholesale/retail)	40	20	60
NV	Government	51	4	55
NV	Landfills/Landfill Gas	6	2	8
NV	Machine/Equipment Manufacturing & Repair	4		4
NV	Manufacturing, Misc.	7		7
NV	Mining (Metal & Coal)	30	11	41
NV	Paints & Painting/Coatings	2		2
NV	Personal Services	5		5
NV	Petroleum/Gas Products/Storage/Pipelines	11	2	13
NV	Pharmaceuticals	1		1
NV	Plastics Manufacturing/Products	7	4	11
NV	Plumbing/HVAC	1		1
NV	Printing/Graphic Arts	6		6
NV	Private Citizens	282	10	292

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL
NC	Private Citizens	162		162
NC	Rubber Manufacturing/Products	3	1	4
NC	Sawmill/Logging/Wood Products	12	4	16
ND	Aerospace	1	1	2
ND	Auto/Body Maintenance, Repair, Refinishing	175	25	200
ND	Concrete/Aggregate	3	1	4
ND	Degreasers	2		2
ND	Dry Cleaners/Laundry Services	27	10	37
ND	Electroplating/Chrome Plating	3		3
ND	Furniture Manufacturing, Repair, Refinishing	30		30
ND	Gasoline Distribution (wholesale/retail)	225	90	315
ND	Incinerators	70		70
ND	Landfills/Landfill Gas	4		4
ND	Manufacturing, Misc.	45	5	50
ND	Printing/Graphic Arts	1		1
ND	Recycling	10		10
ND	Waste/Waste Hauling	2	2	4
NE	Auto/Body Maintenance, Repair, Refinishing	20	16	35
NE	Concrete/Aggregate	12	5	17
NE	Dairy/Feedlots/Livestock	33	8	41
NE	Dry Cleaners/Laundry Services	5	2	7
NE	Furniture Manufacturing/Repair/Wood Finishing	4	3	7
NE	Government	35	12	47
NE	Grains/Grain Elevators	27	10	37
NE	Metal Fabricating/Finishing	6	8	14
NE	Mining/Quarrying	4	2	6
NE	Printing/Graphic Arts	25	4	29
NH	Auto/Body Maintenance, Repair, Refinishing	500	105	605
NJ	Agriculture/Farming/Crop Service	8		8
NJ	Asphalt	2		2
NJ	Attorney/Consultant/Engineer	83		83
NJ	Auto/Body Maintenance, Repair, Refinishing	27		27
NJ	Auto/Motor Vehicle Dealers & Equipment	3		3
NJ	Boat Manufacturing	5		5
NJ	Chemical/Products	19		19
NJ	Construction/Contractor	10		10
NJ	Dry Cleaners/Laundry Services	53		53
NJ	Food/Beverage Products & Processing	3		3
NJ	Foundry/Smelter, Forging, Casting	3		3
NJ	Furniture Manufacturing/Repair/Wood Finishing	2		2
NJ	Gasoline Distribution (wholesale/retail)	4		4
NJ	Machine/Equipment Manufacturing & Repair	13		13
NJ	Manufacturing, Misc.	1		1
NJ	Metal Fabricating/Finishing	31		31
NJ	Mining (Metal & Coal)	9		9
NJ	Other	4		4
NJ	Personal Services	2		2
NJ	Petroleum/Gas Products/Storage/Pipelines	7		7

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL
MO	Stone/Clay/Glass	30	1	31
MO	Textiles & Apparel	3		3
MO	Transport Services	21	1	22
MO	Transportation Equipment	13	1	14
MO	Utilities	100	4	104
MO	Veterinarians	1		1
Mojave Desert, CA	Agriculture/Farming/Crop Service	14	1	15
Mojave Desert, CA	Asbestos/Remediation	25	20	45
Mojave Desert, CA	Asphalt	3	5	8
Mojave Desert, CA	Concrete/Aggregate	4	3	7
Mojave Desert, CA	Dry Cleaners/Laundry Services	46	46	92
Mojave Desert, CA	Gasoline Distribution (wholesale/retail)	20	35	55
Mojave Desert, CA	Metal Fabricating/Finishing	18	32	50
Mojave Desert, CA	Mining (Metal & Coal)	11	3	14
Mojave Desert, CA	Sawmills/Logging/Wood Products	4	3	7
Monterey Bay, CA	Concrete/Aggregate		17	17
Monterey Bay, CA	Construction/Contractor		60	60
Monterey Bay, CA	Dry Cleaners/Laundry Services		56	56
Monterey Bay, CA	Food/Beverage Products & Processing		9	9
Monterey Bay, CA	Gasoline Distribution (wholesale/retail)		509	509
Monterey Bay, CA	Paints & Painting/Coatings		277	277
Monterey Bay, CA	Plastics Manufacturing/Products		13	13
MS	Auto/Body Maintenance/Repair/Refinishing	49	1	50
MS	Dry Cleaners/Laundry Services	49	3	52
MS	Furniture Manufacturing/Repair/Wood Finishing	49	1	50
MS	Printing/Graphic Arts	49	2	51
MT	Auto/Body Maintenance, Repair, Refinishing	232	61	293
MT	Dry Cleaners/Laundry Services	34	15	49
MT	Electroplating/Chrome Plating	6	2	8
MT	Gasoline Distribution (wholesale/retail)		6	6
MT	Manufacturing, Misc.	35	10	45
MT	Printing/Graphic Arts	58	2	60
MT	Recycling		2	2
N. Sonoma, CA	N/R			
NC	Asphalt	2	1	3
NC	Attorney/Consultant/Engineer	298		298
NC	Boat Manufacturing	12	5	17
NC	Chemicals/Products	5	1	6
NC	Concrete/Aggregate	3	3	6
NC	Cotton Gins	3	1	4
NC	Dry Cleaners/Laundry Services	6	2	8
NC	Electroplating/Chrome Plating	8	3	11
NC	Furniture Manufacturing/Repair/Wood Finishing	20	10	30
NC	Grains/Grain Elevators	4	2	6
NC	Metal Fabricating/Finishing	22	5	27
NC	Other	221	3	224
NC	Plastics Manufacturing/Products	2	2	4
NC	Printing/Graphic Arts	3	2	5

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS GENERAL	ON-SITE	TOTAL
MI	Personal Services	101		101
MN	Does not track this information			
MO	Agriculture/Farming/Crop Services	20		20
MO	Airports/Air Transportation	2		2
MO	Analytical/Medical Instruments	1		1
MO	Asphalt	13		13
MO	Attorney/Consultant/Engineer	511	3	514
MO	Auto/Body Maintenance, Repair, Refinishing	3		3
MO	Auto/Motor Vehicle Dealers & Equipment	27		27
MO	Boat Manufacturing	4		4
MO	Business Services	5	2	7
MO	Chemicals/Products	45		45
MO	Communications	1		1
MO	Concrete/Aggregate	40	3	43
MO	Construction/Contractor	26		26
MO	Crushed Stone Products/Sand & Gravel	50	2	52
MO	Dairy/Feedlots/Livestock	3		3
MO	Dry Cleaners/Laundry Services	78	3	81
MO	Electronics/Electric Equipment/Repair	34		34
MO	Engines & Turbines	4		4
MO	Food/Beverage Products & Processing	20	3	23
MO	Foundry/Smelter, Forging, Casting	44	3	47
MO	Furniture Manufacturing/Repair/Wood Finishing	29	7	36
MO	Gasoline Distribution (wholesale/retail)	10		10
MO	Grains/Grain Elevators	21		21
MO	Hospitals/Medical Health Services	14	1	15
MO	Leather/Fur	4		4
MO	Machine/Equipment Manufacturing & Repair	59	3	62
MO	Manufacturing, Misc.	29		29
MO	Metal Fabricating/Finishing	33	1	34
MO	Mining (Metal & Coal)	2		2
MO	Organizations/Associations	17		17
MO	Other	4		4
MO	Paints & Painting/Coatings	22	1	23
MO	Paper Manufacturing & Products	26	6	32
MO	Personal Services	5	1	6
MO	Petroleum/Gas Products/Storage/Pipelines	44		44
MO	Pharmaceuticals	5		5
MO	Plastics Manufacturing/Products	44	1	45
MO	Plumbing/HVAC	4		4
MO	Printing/Graphic Arts	56	6	62
MO	Private Citizens	2		2
MO	Recreation Products/Services	2		2
MO	Repair, Misc.	2		2
MO	Retail/Wholesale Trade	4	1	5
MO	Rubber Manufacturing/Products	17		17
MO	Sawmills/Logging/Wood Products	99	18	117
MO	Schools	16	1	17

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS GENERAL	ON-SITE	TOTAL
LA	Veterinarians	2		2
MA	Analytical/Medical Instruments		23	23
MA	Electronics/Electric Equipment/Repair		45	45
MA	Food/Beverage Products & Processing		16	16
MA	Foundry/Smelter, Forging, Casting		22	22
MA	Furniture Manufacturing/Repair/Wood Finishing		20	20
MA	Manufacturing, Misc.		52	52
MA	Metal Fabricating/Finishing		121	121
MA	Other		62	62
MA	Paper Manufacturing & Products		32	32
MA	Printing/Graphic Arts		39	39
MA	Rubber Manufacturing/Products		34	34
MA	Textiles & Apparel		26	26
MA	Transportation Equipment		9	9
Maricopa Cty, AZ	Auto/Body Maintenance/Repair/Refinishing	30	15	45
Maricopa Cty, AZ	Dry Cleaners/Laundry Services.	15	5	20
Maricopa Cty, AZ	Gasoline Distribution (wholesale/retail)	10	2	12
Maricopa Cty, AZ	Metal Fabricating/Finishing	10	5	15
Maricopa Cty, AZ	Other	30	10	40
Maricopa Cty, AZ	Printing/Graphic Arts	30	15	45
MD	Agriculture/Farming/Crop Service	1		1
MD	Asbestos/Remediation	1		1
MD	Attorney/Consultant/Engineer	2		2
MD	Auto/Body Maintenance, Refinishing, Repair	7		7
MD	Degreasers	2		2
MD	Dry Cleaners/Laundry Services	14		14
MD	Electroplating/Chrome Plating	3		3
MD	Furniture Manufacturing/Repair/Wood Finishing	2		2
MD	Gasoline Distribution (wholesale/retail)	2		2
MD	Government	2		2
MD	Landfills/Landfill Gas	1		1
MD	Organizations/Associations	1		1
MD	Paints & Painting/Coatings	3		3
MD	Petroleum/Gas Products/Storage/Pipelines	1		1
MD	Printing/Graphic Arts	3	1	4
MD	Private Citizen	6		6
MD	Restaurants	1		1
MD	Retail/Wholesale Trade	44		44
MD	Textiles & Apparel	2		2
MD	Transport Services	3		3
MD	Waste/Waste Hauling	3		3
MD	Wholesale	1		1
ME	Gasoline Distribution (wholesale/retail)	1,200	30	1,230
MI	Attorney/Consultant/Engineer	280		280
MI	Government	95		95
MI	Manufacturing, Misc.	349		349
MI	Organizations/Associations	25		25
MI	Other	109		109

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS GENERAL	ON-SITE	TOTAL
LA	Chemicals/Products	16	7	23
LA	Communications	12	4	16
LA	Concrete/Aggregate	8	7	15
LA	Construction/Contractor	29	13	42
LA	Crushed Stone Products/Sand & Gravel		2	2
LA	Dairy/Feedlots/Livestock	4		4
LA	Dry Cleaners/Laundry Services	67	21	88
LA	Electronics/Electric Equipment/Repair	68	1	69
LA	Food/Beverage Products & Processing	3	3	6
LA	Foundry/Smelter, Forging, Casting	8	7	15
LA	Furniture Manufacturing/Repair/Wood Finishing	1	1	2
LA	Furniture Manufacturing/Repair/Wood Finishing	1	3	4
LA	Gasoline Distribution (wholesale/retail)	3		3
LA	Government	18	3	21
LA	Grains/Grain Elevators		2	2
LA	Hospitals/Medical Health Services	62	86	148
LA	Hotels/Motels	1		1
LA	Leather/Fur	3	1	4
LA	Machine/Equipment Manufacturing & Repair	4		4
LA	Manufacturing, Misc.	4		4
LA	Metal Fabricating/Finishing	108	79	187
LA	Mining (Metal & Coal)	6		6
LA	Organizations/Associations	38	1	39
LA	Other	14	4	18
LA	Paints & Painting/Coatings	2		2
LA	Paper Manufacturing & Products		1	1
LA	Personal Services	3		3
LA	Petroleum/Gas Products/Storage/Pipelines	49	32	81
LA	Pharmaceuticals	1		1
LA	Plastics Manufacturing/Products	11	13	24
LA	Plumbing/HVAC	9		9
LA	Printing/Graphic Arts	2	1	3
LA	Private Citizens	7		7
LA	Real Estate		1	1
LA	Recreation Products & Services	1		1
LA	Repair, Misc.	5	5	10
LA	Research & Testing Facilities/Laboratories	2	2	4
LA	Restaurants	2	1	3
LA	Retail/Wholesale Trade	6	2	8
LA	Rubber Manufacturing/Products	2		2
LA	Sawmills/Logging/Wood Products	5	3	8
LA	Schools	5		5
LA	Stone/Clay/Glass	3	1	4
LA	Textiles & Apparel	1	1	2
LA	Transit (passenger)	3	1	4
LA	Transport Services	3	3	6
LA	Transportation Equipment	3	3	6
LA	Utilities	4		4

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS GENERAL	ON-SITE	TOTAL
KS	Hospitals/Medical Health Services	143		143
KS	Machine/Equipment Manufacturing & Repair	3,847	7	3,854
KS	Manufacturing, Misc.	1,325		1,325
KS	Metal Fabricating/Finishing	2,352	3	2,355
KS	Mining (Metal & Coal)	5	2	7
KS	Organizations/Associations	7		7
KS	Personal Services	828	1	829
KS	Petroleum/Gas Products/Storage/Pipelines	524		524
KS	Printing/Graphic Arts	6,928	3	6,931
KS	Retail/Wholesale Trade	1,332		1,332
KS	Rubber Manufacturing/Products	451		451
KS	Sawmills/Logging/Wood Products	1,119		1,119
KS	Schools	32		32
KS	Stone/Clay/Glass	826	2	828
KS	Textiles & Apparel	575		575
KS	Transport Services	800	1	801
KS	Transportation Equipment	482	1	483
KS	Utilities	332		332
KY	Agriculture/Farming/Crop Service		1	1
KY	Asphalt		2	2
KY	Auto/Body Maintenance/Repair/Refinishing		5	5
KY	Auto/Motor Vehicle Dealers & Equipment		2	2
KY	Boat Manufacturing		1	1
KY	Concrete/Aggregate		5	5
KY	Dry Cleaners/Laundry Services		3	3
KY	Electroplating/Chrome Plating		1	1
KY	Furniture Manufacturing/Repair/Wood Finishing		4	4
KY	Machine/Equipment Manufacturing & Repair		1	1
KY	Manufacturing, Misc.		1	1
KY	Metal Fabricating/Finishing		2	2
KY	Personal Services		1	1
KY	Petroleum/Gas Products/Storage/Pipelines		1	1
KY	Plastics Manufacturing/Products		2	2
KY	Printing/Graphic Arts		3	3
KY	Retail/Wholesale Trade		1	1
KY	Rubber Manufacturing/Products		2	2
KY	Sawmills/Logging/Wood Products		3	3
KY	Stone/Clay/Glass		1	1
KY	Transportation Equipment		1	1
LA	Aerospace	1		1
LA	Agriculture/Farming/Crop Services	4	7	11
LA	Analytical/Medical Instruments	2	2	4
LA	Asphalt	2	4	6
LA	Attorney/Consultant/Engineer	39	5	44
LA	Auto/Body Maintenance/Repair/Refinishing	22	9	31
LA	Auto/Motor Vehicle Dealers & Equipment	5	4	9
LA	Boat Manufacturing	93	71	164
LA	Business Services	1	3	4

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS GENERAL	ON-SITE	TOTAL
ID	N/R			
IL	Dry Cleaners/Laundry Services	1,066		1,066
IL	Printing/Graphic Arts	3,284		3,284
IN	Auto/Body Maintenance/Repair/Refinishing	190	118	308
IN	Degreasers	17		17
IN	Dry Cleaners/Laundry Services	125	23	148
IN	Furniture Manufacturing/Repair/Wood Finishing	9	1	10
IN	Other	419		419
IN	Plastics Manufacturing/Products	2	1	3
IN	Plumbing/HVAC	105		105
Jefferson Cty, KY	Auto/Body Maintenance/Repair/Refinishing	20	5	25
Jefferson Cty, KY	Dry Cleaners/Laundry Services	30	15	45
Jefferson Cty, KY	Gasoline Distribution (wholesale/retail)	40	10	50
Jefferson Cty, KY	Printing/Graphic Arts	20	5	25
Kerns, CA	Aerospace	15	5	20
Kerns, CA	Airports/Air Transportation	3	2	5
Kerns, CA	Asbestos/Remediation	20	10	30
Kerns, CA	Asphalt	2	2	4
Kerns, CA	Attorney/Consultant/Engineer	5	5	10
Kerns, CA	Auto Body Maintenance/Repair/Refinishing	15	10	25
Kerns, CA	Boilers	2	2	4
Kerns, CA	Chemicals/Products	2	2	4
Kerns, CA	Concrete/Aggregate	2	2	4
Kerns, CA	Crushed Stone Products/Sand & Gravel	6	4	10
Kerns, CA	Degreasers	3	3	6
Kerns, CA	Dry Cleaners/Laundry Services	5	5	10
Kerns, CA	Engines & Turbines	10	5	15
Kerns, CA	Gasoline Distribution (wholesale/retail)	6	3	9
Kerns, CA	Landfills/Landfill Gas		2	2
Kerns, CA	Metal Fabricating/Finishing	5	5	10
Kerns, CA	Mining (Metal & Coal)	2	2	4
Kerns, CA	Paints & Painting/Coatings	15	10	25
Kerns, CA	Petroleum/Gas Products/Storage/Pipelines	5	10	15
Kerns, CA	Research & Testing Facilities/Laboratories	2	2	4
Kerns, CA	Wastewater Treatment		2	2
KS	Agriculture/Farming/Crop Service	1,123		1,123
KS	Airports/Air Transportation	260		260
KS	Attorney/Consultant/Engineer	50		50
KS	Auto/Body Maintenance/Repair/Refinishing	727	2	729
KS	Auto/Motor Vehicle Dealers & Equipment	191		191
KS	Chemicals/Products	680		680
KS	Construction/Contractor	6		6
KS	Dairy/Feedlots/Livestock	291		291
KS	Electronics/Electric Equipment & Repair	740	1	741
KS	Food/Beverage Products & Processing	1,400		1,400
KS	Foundry/Smelter, Forging, Casting	792		792
KS	Furniture Manufacturing/Repair/Wood Finishing	679	1	680
KS	Government	2,142	18	2,160

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL
DE	Agriculture/Farming/Crop Service	200	10	210
DE	Dry Cleaners/Laundry Services	30	6	36
DE	Furniture Manufacturing/Repair/Wood Finishing	5	2	7
DE	Gasoline Distribution (wholesale/retail)	10	3	13
DE	Retail/Wholesale Trade	6	6	12
FL	Agriculture/Farming/Crop Service	2		2
FL	Attorney/Consultant/Engineer	39		39
FL	Auto/Body Maintenance/Repair/Refinishing	23		23
FL	Boat Manufacturing	4		4
FL	Chemicals/Products	1		1
FL	Concrete/Aggregate	4		4
FL	Construction/Contractor	1		1
FL	Degreasers	1		1
FL	Dry Cleaners/Laundry Services	157		157
FL	Electronics/Electric Equipment & Repair	2		2
FL	Electroplating/Chrome Plating	6		6
FL	Furniture Manufacturing/Repair/Wood Finishing	3		3
FL	Gasoline Distribution (wholesale/retail)	3		3
FL	Government	31		31
FL	Hospitals/Medical Health Services	2		2
FL	Machine/Equipment Manufacturing & Repair	1		1
FL	Organizations/Associations	1		1
FL	Other	6		6
FL	Personal Services	2		2
FL	Plastics Manufacturing/Products	7		7
FL	Printing/Graphic Arts	4		4
FL	Private Citizens	11		11
FL	Recreation Products/Services	1		1
FL	Research & Testing Facilities/Laboratory	1		1
FL	Restaurants	1		1
FL	Retail/Wholesale Trade	1		1
FL	Sawmill/Logging/Wood Products	1		1
FL	Transportation Equipment	1		1
GA	Auto/Body Maintenance/Repair/Refinishing	7	1	8
GA	Bakeries	70		70
GA	Dry Cleaners/Laundry Services	209	2	211
GA	Electroplating/Chrome Plating	12		12
GA	Furniture Manufacturing/Repair/Wood Finishing	3		3
GA	Incinerators	238		238
GA	Other	1,081		1,081
GA	Printing/Graphic Arts	69	1	70
HI	N/R			
IA	Auto/Body Maintenance/Repair/Refinishing	360	35	395
IA	Dry Cleaners/Laundry Services	60	6	66
IA	Grains/Grain Elevators	84	8	92
IA	Manufacturing, Misc.	420	41	461
IA	Other	264	25	289
IA	Printing/Graphic Arts	12	2	14

APPENDIX E-4
INDUSTRY SECTORS RECEIVING ASSISTANCE (PROGRAM RESPONSES)
(DATA FROM 1997 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTS		
		GENERAL	ON-SITE	TOTAL
AK	N/R			
AL	Dry Cleaners/Laundry Services	12		12
AR	Metal Fabricating/Finishing	225		225
AR	Other	254	1	255
AR	Waste/Waste Hauling	140		140
AZ	Aerospace	7		7
AZ	Agriculture/Farming/Crop Service	3		3
AZ	Attorney/Consultant/Engineer	88		88
AZ	Auto/Body Maintenance/Repair/Refinishing	56	2	58
AZ	Chemicals/Products	19	1	20
AZ	Construction/Contractor	22	2	24
AZ	Dry Cleaners/Laundry Services	35	3	38
AZ	Electronics/Electric Equipment & Repair	5		5
AZ	Electroplating/Chrome Plating	12		12
AZ	Furniture Manufacturing/Repair/Wood Finishing	7		7
AZ	Government	141		141
AZ	Hospitals/Medical Health Services	6		6
AZ	Machine/Equipment Manufacturing & Repair	4		4
AZ	Mining (Metal & Coal)	17		17
AZ	Other	2		2
AZ	Paints & Painting/Coatings	3		3
AZ	Plastics Manufacturing/Products	5		5
AZ	Printing/Graphic Arts	14	4	18
AZ	Private Citizen	213		213
AZ	Recycling	4		4
AZ	Sawmills/Logging/Wood Products	2		2
AZ	Schools	13		13
AZ	Stone/Clay/Glass	11		11
AZ	Utilities	2		2
Bay Area, CA	Auto/Body Maintenance/Repair/Refinishing	38	438	476
Bay Area, CA	Dry CleanersLaundry Services	48	197	245
Bay Area, CA	Printing/Graphic Arts	10	143	153
Bay Area, CA	Sawmills/Logging/Wood Products	30	108	138
CA	N/R			620
CO	Auto/Body Maintenance/Repair/Refinishing	200	15	215
CO	Crushed Stone Products/Sand & Gravel	35		35
CO	Dry Cleaners/Laundry Services	500	40	540
CO	Electroplating/Chrome Plating	20	10	30
CO	Furniture Manufacturing/Repair/Wood Finishing	5		5
CO	Printing/Graphic Arts	2,500		2,500
CT	Auto/Body Maintenance/Repair/Refinishing	1,500	50	1,550
CT	Dry Cleaners/Laundry Services	200	26	226
CT	Gasoline Distribution (wholesale/retail)	75		75
CT	Metal Fabricating/Finishing	300	48	348
CT	Other	800	65	865
CT	Printing/Graphic Arts	100		100
DC	Dry Cleaners/Laundry Services	200	40	240

APPENDIX E-3
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, ORDERED BY ON-SITE ASSISTS
(DATA FROM 1997 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER GENERAL	OF ON-SITE	ASSISTS TOTAL
Repair, Misc.	7	23	7	30
Aerospace	5	156	6	162
Recycling	7	158	6	164
Utilities	11	467	6	473
Business Services	5	30	5	35
Engines & Turbines	2	15	5	20
Landfills/Landfill Gas	6	172	5	177
Communications	4	15	4	19
Degreasers	8	55	4	59
Research & Testing Facilities/Laboratories	6	14	4	18
Personal Services	10	972	3	975
Airports/Air Transportation	3	265	2	267
Cotton Gins	2	6	2	8
Leather/Fur	5	9	2	11
Waste/Waste Hauling	3	145	2	147
Wastewater Treatment	1	-	2	2
Machine Shops	2	7	1	8
Organizations/Associations	10	278	1	279
Real Estate	3	12	1	13
Recreation Products/Services	5	15	1	16
Restaurants	5	11	1	12
Schools	8	118	1	119
Transit (passenger)	2	4	1	5
Bakeries	1	70	-	70
Hotels/Motels	3	47	-	47
Incinerators	4	363	-	363
Pharmaceuticals	5	15	-	15
Veterinarians	2	3	-	3
TOTALS	734	72845	5720	78565

APPENDIX E-3
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, ORDERED BY ON-SITE ASSISTS
(DATA FROM 1997 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER GENERAL	OF ON-SITE	ASSISTS TOTAL
Auto/Body Maintenance, Refinishing, Repair	37	5,556	1,161	6,717
Gasoline Distribution (wholesale/retail)	19	2,079	823	2,902
Dry Cleaners/Laundry Services	39	4,132	795	4,927
Other	26	8,614	414	9,028
Metal Fabricating/Finishing	21	3,549	354	3,903
Paints & Painting/Coatings	10	356	307	663
Printing/Graphic Arts	36	14,101	300	14,401
Saw Mills/Logging/Wood Products	18	1,990	219	2,209
Manufacturing, Misc.	20	2,810	125	2,935
Construction/Contractor	14	238	96	334
Hospitals/Medical Health Services	10	254	92	346
Furniture Manufacturing/ Repair/Wood Finishing	27	2,243	89	2,332
Boat Manufacturing	10	127	78	205
Petroleum/Gas Products/Storage/Pipelines	13	815	51	866
Electronics/Electric Equipment & Repair	12	890	50	940
Concrete/Aggregate	13	151	49	200
Foundry/Smelter, Forging, Casting	17	985	45	1,030
Paper Manufacturing & Products	6	117	44	161
Government	14	2,909	43	2,952
Rubber Manufacturing/Products	8	489	43	532
Electroplating/Chrome Plating	23	240	42	282
Food/Beverage Products & Processing	12	1,718	40	1,758
Plastics Manufacturing/Products	16	146	40	186
Asbestos/Remediation	4	52	30	82
Grains/Grain Elevators	8	274	29	303
Textiles & Apparel	10	594	28	622
Analytical/Medical Instruments	4	6	25	31
Machine/Equipment Manufacturing & Repair	10	4,017	23	4,040
Mining (Metal & Coal)	12	116	23	139
Agriculture/Farming/Crop Service	14	1,386	21	1,407
Auto/Motor Vehicle Dealers & Equipment	8	257	17	274
Crushed Stone Products/Sand & Gravel	7	131	17	148
Stone/Clay/Glass	10	902	17	919
Transportation Equipment	7	505	16	521
Asphalt	9	36	14	50
Chemicals/Products	15	926	14	940
Attorney/Consultant/Engineer	16	2,075	13	2,088
Plumbing/HVAC	9	166	12	178
Boilers	1	5	11	16
Private Citizens	9	840	10	850
Retail/Wholesale Trade	10	1,423	10	1,433
Transport Services	10	846	10	856
Dairy/Feedlots/Livestock	5	334	8	342

APPENDIX E-2
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, ORDERED BY TOTAL ASSISTS
(DATA FROM 1997 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTS GENERAL	NUMBER OF ASSISTS ON-SITE	ASSISTS TOTAL
Aerospace	5	156	6	162
Paper Manufacturing & Products	6	117	44	161
Crushed Stone Products/Sand & Gravel	7	131	17	148
Waste/Waste Hauling	3	145	2	147
Mining (Metal & Coal)	12	116	23	139
Schools	8	118	1	119
Asbestos/Remediation	4	52	30	82
Bakeries	1	70	-	70
Degreasers	8	55	4	59
Asphalt	9	36	14	50
Hotels/Motels	3	47	-	47
Business Services	5	30	5	35
Analytical/Medical Instruments	4	6	25	31
Repair, Misc.	7	23	7	30
Engines & Turbines	2	15	5	20
Communications	4	15	4	19
Research & Testing Facilities/Laboratories	6	14	4	18
Boilers	1	5	11	16
Recreation Products/Services	5	15	1	16
Pharmaceuticals	5	15	-	15
Real Estate	3	12	1	13
Restaurants	5	11	1	12
Leather/Fur	5	9	2	11
Cotton Gins	2	6	2	8
Machine Shops	2	7	1	8
Transit (passenger)	2	4	1	5
Veterinarians	2	3	-	3
Wastewater Treatment	1	-	2	2
TOTALS	734	72,845	5,720	78,565

APPENDIX E-2
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, ORDERED BY TOTAL ASSISTS
(DATA FROM 1997 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTS GENERAL	ON-SITE	TOTAL
Printing/Graphic Arts	36	14,101	300	14,401
Other	26	8,614	414	9,028
Auto/Body Maintenance, Refinishing, Repair	37	5,556	1,161	6,717
Dry Cleaners/Laundry Services	39	4,132	795	4,927
Machine/Equipment Manufacturing & Repair	10	4,017	23	4,040
Metal Fabricating/Finishing	21	3,549	354	3,903
Government	14	2,909	43	2,952
Manufacturing, Misc.	20	2,810	125	2,935
Gasoline Distribution (wholesale/retail)	19	2,079	823	2,902
Furniture Manufacturing/ Repair/Wood Finishing	27	2,243	89	2,332
Saw Mills/Logging/Wood Products	18	1,990	219	2,209
Attorney/Consultant/Engineer	16	2,075	13	2,088
Food/Beverage Products & Processing	12	1,718	40	1,758
Retail/Wholesale Trade	10	1,423	10	1,433
Agriculture/Farming/Crop Service	14	1,386	21	1,407
Foundry/Smelter, Forging, Casting	17	985	45	1,030
Personal Services	10	972	3	975
Chemicals/Products	15	926	14	940
Electronics/Electric Equipment & Repair	12	890	50	940
Stone/Clay/Glass	10	902	17	919
Petroleum/Gas Products/Storage/Pipelines	13	815	51	866
Transport Services	10	846	10	856
Private Citizens	9	840	10	850
Paints & Painting/Coatings	10	356	307	663
Textiles & Apparel	10	594	28	622
Rubber Manufacturing/Products	8	489	43	532
Transportation Equipment	7	505	16	521
Utilities	11	467	6	473
Incinerators	4	363	-	363
Hospitals/Medical Health Services	10	254	92	346
Dairy/Feedlots/Livestock	5	334	8	342
Construction/Contractor	14	238	96	334
Grains/Grain Elevators	8	274	29	303
Electroplating/Chrome Plating	23	240	42	282
Organizations/Associations	10	278	1	279
Auto/Motor Vehicle Dealers & Equipment	8	257	17	274
Airports/Air Transportation	3	265	2	267
Boat Manufacturing	10	127	78	205
Concrete/Aggregate	13	151	49	200
Plastics Manufacturing/Products	16	146	40	186
Plumbing/HVAC	9	166	12	178
Landfills/Landfill Gas	6	172	5	177
Recycling	7	158	6	164

APPENDIX E-1
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, ORDERED BY NUMBER OF STATES
(DATA FROM 1997 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER GENERAL	OF ON-SITE	ASSISTS TOTAL
Repair, Misc.	7	23	7	30
Transportation Equipment	7	505	16	521
Landfills/Landfill Gas	6	172	5	177
Paper Manufacturing & Products	6	117	44	161
Research & Testing Facilities/Laboratories	6	14	4	18
Aerospace	5	156	6	162
Business Services	5	30	5	35
Dairy/Feedlots/Livestock	5	334	8	342
Leather/Fur	5	9	2	11
Pharmaceuticals	5	15	-	15
Recreation Products/Services	5	15	1	16
Restaurants	5	11	1	12
Analytical/Medical Instruments	4	6	25	31
Asbestos/Remediation	4	52	30	82
Communications	4	15	4	19
Incinerators	4	363	-	363
Airports/Air Transportation	3	265	2	267
Hotels/Motels	3	47	-	47
Real Estate	3	12	1	13
Waste/Waste Hauling	3	145	2	147
Cotton Gins	2	6	2	8
Engines & Turbines	2	15	5	20
Machine Shops	2	7	1	8
Transit (passenger)	2	4	1	5
Veterinarians	2	3	-	3
Bakeries	1	70	-	70
Boilers	1	5	11	16
Wastewater Treatment	1	-	2	2
TOTALS	734	72,845	5,720	78,565

APPENDIX E-1
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, ORDERED BY NUMBER OF STATES
(DATA FROM 1997 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF GENERAL	OF ON-SITE	ASSISTS TOTAL
Dry Cleaners/Laundry Services	39	4,132	795	4,927
Auto/Body Maintenance, Refinishing, Repair	37	5,556	1,161	6,717
Printing/Graphic Arts	36	14,101	300	14,401
Furniture Manufacturing/ Repair/Wood Finishing	27	2,243	89	2,332
Other	26	8,614	414	9,028
Electroplating/Chrome Plating	23	240	42	282
Metal Fabricating/Finishing	21	3,549	354	3,903
Manufacturing, Misc.	20	2,810	125	2,935
Gasoline Distribution (wholesale/retail)	19	2,079	823	2,902
Saw Mills/Logging/Wood Products	18	1,990	219	2,209
Foundry/Smelter, Forging, Casting	17	985	45	1,030
Attorney/Consultant/Engineer	16	2,075	13	2,088
Plastics Manufacturing/Products	16	146	40	186
Chemicals/Products	15	926	14	940
Agriculture/Farming/Crop Service	14	1,386	21	1,407
Construction/Contractor	14	238	96	334
Government	14	2,909	43	2,952
Concrete/Aggregate	13	151	49	200
Petroleum/Gas Products/Storage/Pipelines	13	815	51	866
Electronics/Electric Equipment & Repair	12	890	50	940
Food/Beverage Products & Processing	12	1,718	40	1,758
Mining (Metal & Coal)	12	116	23	139
Utilities	11	467	6	473
Boat Manufacturing	10	127	78	205
Hospitals/Medical Health Services	10	254	92	346
Machine/Equipment Manufacturing & Repair	10	4,017	23	4,040
Organizations/Associations	10	278	1	279
Paints & Painting/Coatings	10	356	307	663
Personal Services	10	972	3	975
Retail/Wholesale Trade	10	1,423	10	1,433
Stone/Clay/Glass	10	902	17	919
Textiles & Apparel	10	594	28	622
Transport Services	10	846	10	856
Asphalt	9	36	14	50
Plumbing/HVAC	9	166	12	178
Private Citizens	9	840	10	850
Auto/Motor Vehicle Dealers & Equipment	8	257	17	274
Degreasers	8	55	4	59
Grains/Grain Elevators	8	274	29	303
Rubber Manufacturing/Products	8	489	43	532
Schools	8	118	1	119
Crushed Stone Products/Sand & Gravel	7	131	17	148
Recycling	7	158	6	164

APPENDIX E

SBTCP ACTIVITIES AND SERVICES

Three states have contracted the management of the SBAP to an outside entity. Information on SBAP contractors is provided below.

STATE	CONTRACTED COMPANY
Kansas	Mr. Francis M. Orzulak University of Kansas Center for Environmental Education and Training Center for Environmental Education and Training University of Kansas, Continuing Education Building Lawrence, KS 66045-2607 785-864-3968 785-864-5827 fax 1997 budget: $335,000 Term of contract: July 1-July 1 annual renewal
Kentucky	Mr. Gregory C. Copley, Director Kentucky Business Environmental Assistance Program Center for Entrepreneurship Gatton College of Business & Economics University of Kentucky Lexington, KY 40506-0034 606-257-1131 606-323-1907 fax 1997 budget: $250,000 Term of contract: July 1, 1997 through June 30, 1998
Pennsylvania	Ms. Cecily Beall Tetra Tech EM, Inc. 1800 JFK Boulevard, 6th Floor Philadelphia, PA 19103 215-656-8709 215-972-0484 fax 1997 budget: $340,000 Term of contract: 5 years

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Wisconsin	Department of Commerce, Business Development Assistance Center, Division of Marketing Advocacy and Technology Development	Department of Commerce, Business Development Assistance Center, Division of Marketing Advocacy and Technology Development	Outside of state agencies, including small business owners and other state agencies
Wyoming	WY Department of Environmental Quality, Administrative Division	WY Department of Environmental Quality, Administrative Division	Independent citizens panel appointed by legislature, Governor, and Department located outside any state agency

*Notes

MA SBO: Secretary of Environmental Affairs, Trudy Coxe, Executive Office of Environmental Affairs, routinely meets with business and environmental leaders to solicit input on problems and programs.

SBAP: OTA routinely collaborates with DEP on compliance assistance programs, including Printers Partnership (MP2), all Environmental Results program (ERP) sectors, and Collision Repair Auto Shop Help (CRASH) Course for Compliance and Pollution Prevention targeted for the autobody refinishing industry. All such programs impacting small business in MA receive the benefits of SBAP-oriented planning incorporated into DEP programs, which are implemented by DEP staff within the state's five regions. For example, in the MP2 program, several DEP personnel accounted for more than 2,000 person/hours, OTA/SBAP staff for 1,750. In 1997, DEP, OTA, and EPA New England staff devoted considerable time and resources to developing and implementing the CRASH Course program, which will affect more than 2,000 small businesses.

NV Some SBAP outreach activities have been contracted to the Business Environmental Program (BEP) of UNR. CAP is independent panel with individual members located outside the agency. SBO & SBAP serve as staff members to CAP with SBO taking primary lead.

VI SBTAP coordinator serving dual role as SBO/SBTAP without additional compensation. All SBAP support staff may be compensated in the future through Title V.

WA SBO is agency representative to the Governor's Small Business Improvement Council composed of small business owners and various state agencies, which are responsible for regulating the state's businesses. SBO is agency representative to the Unified Business Identifier Board composed of state and federal regulatory agencies impacting small businesses. SBAP supports technical assistance staff for business-related pollution control/prevention in other Ecology programs, outreach and assistance staff in the state's 7 local air quality control agencies, and moderate risk waste staff in the state's 39 counties. One CAP member is the legislative liaison for the Air Quality Program. All other CAP members are unpaid volunteers (per diem travel, lodging, and meals are reimbursed). Staff support is provided by SBAP.

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
South Dakota	Supervised by Secretary of the Department	Air Program	Independent
Tennessee	TN Department of Environment & Conservation, Assistant Commissioner's Office	TN Department of Environment & Conservation, Division of Pollution Prevention/Environmental Awareness	Not operating (appointments in progress)
Texas	TX Natural Resource Conservation Commission, Small Business Assistance Program	TX Natural Resource Conservation Commission, Small Business Assistance Program	TX Natural Resource Conservation Commission, Small Business Assistance Program
Utah	UT Department of Environmental Quality, Office of Planning and Public Affairs	UT Department of Environmental Quality, Division of Air Quality, Operating Permits Section	UT Department of Environmental Quality, Division of Air Quality
Vermont	N/R	Department of Environmental Conservation, Environmental Assistance Division	Department of Environmental Conservation, Environmental Assistance Division
Virginia	Department of Environmental Quality, Technical Support Division	Department of Environmental Quality, Customer Service Division	Appointed as per Section 507 with all outside appointments except the DEQ appointment
US Virgin Islands	Department of Planning and Natural Resources	Department of Planning and Natural Resources	Not yet named
Washington	Department of Ecology, Air Quality Program*	Department of Ecology, Air Quality Program*	Independent*
West Virginia	WV Division of Environmental Protection (DEP)	WV DEP, Office of Air Quality	Located outside all agencies, appointed pursuant to Section 507

N/A Not applicable N/R No response

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
North Carolina	NC Department of Environment and Natural Resources, Division of Pollution Prevention and Environmental Assistance	NC Department of Environment and Natural Resources, Division of Pollution Prevention and Environmental Assistance	Independent
North Dakota	Department of Health, Environmental Health Section Chief's Office	Department of Health, Environmental Health Section (air, water, waste management programs)	Independent and located outside all agencies
Ohio	Clean Air Resources Center, OH Air Quality Development Authority (independent, nonregulatory, financing agency)	Division of Air Pollution Control, OH Environmental Protection Agency	Appointed as defined in Section 507
Oklahoma	ODEQ, Executive Director's Office	ODEQ, Customer Services Division	ODEQ, Customer Services Division
Oregon	Department of Environmental Quality, Director's Office	Department of Environmental Quality, Air Quality Division	Outside agency and liaison to SBAP, SBO, small businesses
Pennsylvania	Department of Environmental Protection, Office of Pollution Prevention and Compliance Assistance	Contracted (see below)	Independent
Puerto Rico	Commerce Development Administration	Environmental Quality Board, Air Quality Area (regulatory)	Not in full operation
Rhode Island	RI DEM, Office of the Director	RI DEM, Office of Technical and Customer Assistance (2 FTE); University of RI, Center for Pollution Prevention (0.5 FTE)	Will be located outside state agencies with individuals appointed as per Section 507
South Carolina	Department of Health and Environmental Control, Environmental Quality Control Administration	Department of Health and Environmental Control, Environmental Quality Control Administration	Department of Health and Environmental Control, Environmental Quality Control Administration

N/A Not applicable N/R No response

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Nebraska	Public Advocate serves as SBO	Public Advocate serves as SBAP Director	Public Advocate administers CAP activities
Nevada	NV Division of Environmental Protection, Office of the Administrator	NV Division of Environmental Protection, Office of the Administrator*	Independent*
NV BAQ	NV Division of Environmental Protection, Bureau of Air Quality (BAQ). The NDEP is the primary state regulatory agency for environmental issues and the BAQ has oversight of air issues statewide with the exception of stationary sources located in Washoe and Clark Counties.		
Washoe Cty Air Quality Program	Washoe County District Health Department, Air Quality Management Divisions; 401 Ryland Street, Suite #331; Reno, NV 89502-0027. This is the county regulatory agency for air quality issues.		
Clark Cty Air Quality Program	Clark County Health District, Air Pollution Control Division; 625 Shadow Lane; Las Vegas, NV 89106. This is the county regulatory agency for air quality issues.		
BEP-UNR	NV Small Business Development Center, Business Environmental Program (BEP), University of Nevada Reno (UNR), c/o UNR College of Business Administration, 1664 N. Virginia Street, Reno, NV 89503. BEP is under contract with NDEP to provide outreach materials, workshops, and assistance regarding air quality issues (contract expires 8/98).		
New Hampshire	NH Department of Environmental Services, Office of the Commissioner	NH Department of Environmental Services, Air Resources Division	Independent with administrative support from SBAP and DES Air Resources Division
New Jersey	NJ Department of Commerce and Economic Development	NJ Department of Environmental Protection	NJ Department of Environmental Protection
New Mexico	NM Environment Department	NM Environment Department, Air Quality Bureau	Independent and located outside the agency
New York	New York State Empire State Development, Division for Small Business (nonregulatory state agency)	New York State Environmental Facilities Corporation, Technical Advisory Services Division (nonregulatory public benefit corporation)	New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Technical Services (administrative location and CAP point of contact)

N/A Not applicable N/R No response

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Maryland	Maryland Department of the Environment (MDE), Office of the Assistant Secretary (regulatory)	MDE Environmental Permit Service Center (regulatory)	N/A
Massachusetts	SBAP manager at OTA functions as SBO and receives all communications routinely directed to the SBO.*	Program functions are divided between DEP and OTA. DEP recently reorganized and has established a "business compliance unit," which deals with permits, compliance, and enforcement activities related to industrial and commercial entities.*	Not established
Michigan	MI Jobs Commission, Business Ombudsman's Office (economic development agency)	MI Department of Environmental Quality, Environmental Assistance Division (regulatory agency)	N/A
Minnesota	MN Pollution Control Agency (MPCA), Environmental Planning and Review Office	MPCA, Air Quality Division, Manager's Office	Independent
Mississippi	Department of Environmental Quality, Environmental Resource Center	Department of Environmental Quality, Environmental Resource Center	Department of Environmental Quality, Environmental Resource Center
Missouri	Governor's Office	MO Department of Natural Resources, Division of Environmental Quality, Technical Assistance Program	Administratively associated with MDNR, supported by the Technical Assistance Program.
Montana	MT Department of Environmental Quality, Pollution Prevention Bureau (nonregulatory)	MT Department of Environmental Quality, Air and Waste Management Bureau and Pollution Prevention Bureau (duties shared)	MT Department of Environmental Quality, Pollution Prevention Bureau

N/A Not applicable N/R No response

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Illinois	IEPA (regulatory)	IL Department of Commerce and Community Affairs, Small Business Development Center network	N/A
Indiana	IN Department of Environmental Management, Office of Business Relations and Legislative Affairs	IN Department of Environmental Management, Office of Pollution Prevention and Technical Assistance	Independent
Iowa	Small Business Liaison, IA Department of Economic Development	IA Air Emissions Assistance Program (IAEAP), IA Waste Reduction Center (IWRC), University of Northern Iowa	Pending legislators' appointment
Kansas	KS Department of Health and Environment, Bureau of Environmental Field Services, Office of Pollution Prevention	Contracted* to University of KS, Center for Environmental Education and Training with subcontracts to KS State University and Wichita State University	Independent
Kentucky	Office of the Commissioner, Department for Environmental Protection, Natural Resources and Environmental Protection Cabinet	University of Kentucky*	Panel members appointed by Executive Order of the Governor
Jefferson County	Department of Planning and Environmental Management of Jefferson County	Air Pollution Control District	See KY
Louisiana	DEQ Department Secretary	DEQ Air Quality Division	Independent
Maine	Department of Environmental Protection	Department of Environmental Protection	Outside Department as defined by Section 507

N/A Not applicable N/R No response

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Colorado	CO Department of Public Health and Environment (CDPHE), Office of Customer Service	CDPHE, Air Pollution Control Division, Stationary Sources Program	Independent; located outside regulatory agencies. Members appointed as defined in Section 507
Connecticut	CT Department of Environmental Protection (regulatory agency)	CT Department of Environmental Protection (regulatory agency)	CT Department of Environmental Protection (regulatory agency)
Delaware	DNREC Secretary's Office	DNREC Secretary's Office, DNREC Air and Waste Management Engineering and Compliance Sections	Outside of all agencies
District of Columbia	State regulatory agency	State regulatory agency	Not operational
Florida	Department of Environmental Protection, Division of Air Resources and Management, Office of Air Programs Communications and Outreach	Department of Environmental Protection, Division of Air Resources and Management, Office of Air Programs Communications and Outreach	Independent
Georgia	EPD/Air Protection Branch	EPD/Air Protection Branch	One CAP member is the program manager of the Compliance Permitting Program within the Air Protection Branch. The rest of the CAP is located outside of all agencies with each individual appointed as defined in Section 507
Hawaii	State Department of Health, Deputy Director of Environmental Health	State Department of Health, Environmental Management Division, Clean Air Branch	Independent
Idaho	Division of Environmental Quality; Planning and Support Services; Prevention, Planning, and Outreach Bureau	Division of Environmental Quality, Air and Hazardous Waste Division	Outside of all agencies, appointed as defined in Section 507

N/A Not applicable N/R No response

TABLE D-7
ADMINISTRATIVE LOCATION OF SBTCP COMPONENTS

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Alabama	AL Department of Environmental Management, Office of Education & Outreach	AL Department of Environmental Management, Air Division	Independent
Alaska	AK Department of Environmental Conservation, Compliance Assistance Office (non-enforcement)	AK Department of Environmental Conservation, Compliance Assistance Office (non-enforcement)	Private, uncompensated individuals from small business and the general public appointed by the legislature and the Governor. One member is an employee of the Department.
Arizona	AZ Department of Environmental Quality, Compliance Assistance Section	AZ Department of Environmental Quality, Compliance Assistance Section	Located outside the Agency, but managed by AZ Department of Environmental Quality, Compliance Assistance Section
Maricopa County	N/R	Community Service Division of Department (nonregulatory)	N/R
Arkansas	Director's Office (regulatory agency)	Customer Service Division	Customer Service Division
California	Air Resources Board (ARB), Office of the Ombudsman (part of ARB, Office of the Chairman)	Throughout ARB, including the Office of the Ombudsman, Office of the Chairman, and local Air Pollution Control Districts	ARB, Office of the Chairman
Kerns Cty	Bakersfield (regulatory)	Bakersfield and Mojave (regulatory)	N/A
South Coast	The South Coast Air Quality Management District is a regional (Los Angeles, Orange, and portions of Riverside and San Bernardino Counties) single media (air only) regulatory agency. The ombudsman function and outreach function are co-located in the Public Advisor's Office of the agency.		

N/A Not applicable N/R No response

TABLE D-6
(Continued)

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
Wisconsin	5	2	2	0	0
Wyoming	3*	1	1*	2*	2*

*Notes:

AZ Awaiting reappointment after term expiration.

South Coast This body will be a new Local Government and Small Business Committee. To be elected are 4 local government elected officials and 3 AQMD Board Members.

IN Environmental organization.

KS One member resigned and position has not been filled to date.

KY 1 economic development representative and 1 local air pollution control district representative.

ME 2 business, 1 labor, 1 municipal government, 2 environmental.

MA While CAP has not been formally established, Secretary of Environmental Affaire meets monthly with leaders of large and small businesses, environmental groups, and the general public to discuss environmental progress and problems. In addition, each of OTA's five regional technical assistance teams has advisory committees that provide feedback concerning regulatory issues and business needs.

MI 2 attorneys.

MN The CAP currently is dormant due to a pending reorganization of the MPCA.

NE The SBO as a non-voting member.

OH 1 current. Member's 2-year term expired August 1997; replacement not yet appointed.

OR CAP was expanded to 8 members in 7/95. Eighth member represents Lane Regional Air Pollution Authority (Eugene, OR) small business interests.

PR Officially not appointed.

UT Honorary member of UT Pollution Prevention Association (small business, nonprofit group working to prevent and reduce industry pollution).

VT Legislative.

WY 1 small business owner up for reappointment. 1 replacement member of the general public being recruited. Other: 2 major source representatives.

N/A Not applicable N/E Not established N/R No response

TABLE D-6
(Continued)

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
North Carolina	4 (of 8)	1 (of 8)	3 (of 8)	0	0
North Dakota	4	1	2	0	0
Ohio	4	1	2*	0	0
Oklahoma	3	1	2	1	0
Oregon	4	1	2	N/A	1*
Pennsylvania	5	3	1	2	0
Puerto Rico	3	1*	2	1	0
Rhode Island	0	0	0	7	0
South Carolina	4	1	1	1	0
South Dakota	4	1	2	0	0
Tennessee	0	0	0	7	0
Texas	3	1	1	0	2
Utah	4	1	2	0	1*
Vermont	5	0	1	0	1*
Virginia	4	1	2	0	0
Virgin Islands	0	0	0	0	0
Washington	2	1	1	3	0
West Virginia	4	1	2	0	0

N/A Not applicable N/E Not established N/R No response

TABLE D-6
(Continued)

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
Kansas	3	1	2	1*	0
Kentucky	4	1	2	0	2*
Jefferson County	See KY				
Louisiana	4	2	2	0	0
Maine	4	2	2	2	6*
Maryland	0	0	0	0	0
Massachusetts	0	0	0	7*	0
Michigan	1	1	2	1	2*
Minnesota	0*				
Mississippi	4	1	2	0	0
Missouri	2	1	2	2	0
Montana	6	1	N/A	N/A	0
Nebraska	4	1	2	0	1*
Nevada	4	1	2	0	0
New Hampshire	4	1	2	0	0
New Jersey	4	1	2	0	0
New Mexico	4	1	2	0	0
New York	6	1	2	0	0

N/A Not applicable N/E Not established N/R No response

TABLE D-6
CAP COMPOSITION

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
Alabama	4	1	2	0	0
Alaska	4	1	1	1	0
Arizona	0	1	2	0	4*
Maricopa County	N/R				
Arkansas	2	1	1	3	0
California	0	0	0	6	0
Kerns Cty	N/A				
South Coast	4		4		7*
Colorado	3	1	3	0	0
Connecticut	4	2	4	0	0
Delaware	5	1	1	0	0
District of Columbia	4	1	2	0	0
Florida	3	1	3	0	0
Georgia	3	1	0	3	0
Hawaii	N/E				
Idaho	0	1	0	6	0
Illinois	1	0	0	6	0
Indiana	4	1	0	1	1*
Iowa	1	1	0	4	1

N/A Not applicable N/E Not established N/R No response

TABLE D-5
(Continued)

STATE OR TERRITORY	SBO FUNCTION (# FTEs)			SBAP FUNCTION (# FTEs)			
	SBO	OTHER STAFF	TOTAL SBO STAFF	PAID	UNPAID	RETIRED ENGINEERS	TOTAL SBAP STAFF
West Virginia	1.00	0.20	1.20	1.40	0	0	1.40
Wisconsin	0.50	2.00	2.50	2.50	0	0	2.50
Wyoming	0.50	0	0.50	1.00	0	0	1.00

*Notes:

AL 10% of a staff of 20.

Maricopa Cty, AZ 2 FTE, 1 @ 75%, 1@ 25%.

CT 1 vacant SBO position. SBAP position durational.

MA SBO function not established. Function met as described in Appendix D-2.

ND SBAP 0.5 air, 1.5 other media.

TX SBO and SBAP staff combined.

VA SBO other staff is 0.90 SBAP director. SBAP staff includes SBAP director, 1 FTE for Leadership Grant, 0.3 FTE fro Office of Small Business Assistance Air Toxics Section's 2 engineers providing SBAP outreach and compliance assistance for MACT, and 0.2 FTE considered as SBAP from SBAP Permit Engineer Liaisons who function in an ad-hoc/on-request manner in the 6 DEQ regional offices.

N/A Not applicable N/R No response

TABLE D-5
(Continued)

STATE OR TERRITORY	SBO FUNCTION (# FTEs)			SBAP FUNCTION (# FTEs)			
	SBO	OTHER STAFF	TOTAL SBO STAFF	PAID	UNPAID	RETIRED ENGINEERS	TOTAL SBAP STAFF
New York	5.00	Occasional contractors	5.00	7.00	0	0	7.00
North Carolina	1.50	0	1.50	2.50	0	0	2.50
North Dakota	0.50	0	0.50	2.00*	0	0	2.00
Ohio	0.50	1.20	1.70	4.00	0	0	4.00
Oklahoma	0.10	0	0.10	4.00	0	0	4.00
Oregon	0.15	0.20	0.35	1.00	0	0	1.00
Pennsylvania	1.00	0	1.00	3.50	0	0	3.50
Puerto Rico	0	0	0	3.00	0	0	3.00
Rhode Island	1.00	0	1.00	2.50	0	0	2.50
South Carolina	1.00	0.80	1.80	1.80	0	0	1.80
South Dakota	0.50	0	0.50	0.14	0	0	0.14
Tennessee	1.30	11.00	12.30	N/A	N/A	N/A	N/A
Texas	15.50*	0	15.50	SBO/SBAP combined.	50.00+ Enviromentors	0	50.00+
Utah	0.50	0	0.50	2.50	0	0	2.50
Vermont	0	0	0	1.10	0	0	1.10
Virginia	0.10	0.90	1.00	2.50*	0	0	2.50
Virgin Islands	1.00	0	1.00	1.00	0	0	1.00
Washington	0.50	0	0.50	2.50	0	0	2.50

N/A Not applicable N/R No response

TABLE D-5
(Continued)

STATE OR TERRITORY	SBO FUNCTION (# FTEs)			SBAP FUNCTION (# FTEs)			
	SBO	OTHER STAFF	TOTAL SBO STAFF	PAID	UNPAID	RETIRED ENGINEERS	TOTAL SBAP STAFF
Indiana	2.00	0.25	2.25	12.00	0	0	12.00
Iowa	1.00	0	1.00	5.00	0	0	5.00
Kansas	1.00	1.00	2.00	5.10	0	0	5.10
Kentucky	1.50	0	1.50	3.00	0	0	3.00
Jefferson County	1.00	0	1.00	2.00	0	0	2.00
Louisiana	0.25	0	0.25	11.00	0	0	11.00
Maine	1.00	0	1.00	1.00	0	0	1.00
Maryland	0.05	0	0.05	1.00	0	0	1.00
Massachusetts	0*	N/A	N/A	1.20	N/A	N/A	1.20
Michigan	1.00	0.50	1.50	5.00	0	0	5.00
Minnesota	1.00	0	1.00	3.00	0	0	3.00
Mississippi	3.00	0	3.00	6.50	0	0	6.50
Missouri	1.00	0	1.00	7.65	0	0	7.65
Montana	1.00	0	1.00	1.00	0	0	1.00
Nebraska	1.00	0	1.00	1.00	0	0	1.00
Nevada	1.00	0	1.00	1.00	0	0	1.00
New Hampshire	0.25	0	0.25	1.25	0	0	1.25
New Jersey	1.00	0	1.00	1.00	0	0	1.00
New Mexico	0.50	0	0.50	4.50	0	0	4.50

N/A Not applicable N/R No response

TABLE D-5
STAFFING INFORMATION

A summary of the number of full time equivalents (FTEs) that support the SBO function and SBAP function are shown in Table D-5. With respect to the SBAP, the number of paid and unpaid staff are shown separately. The utilization of retired engineers to serve the SBAP also is indicated.

STATE OR TERRITORY	SBO FUNCTION (# FTEs)			SBAP FUNCTION (# FTEs)			
	SBO	OTHER STAFF	TOTAL SBO STAFF	PAID	UNPAID	RETIRED ENGINEERS	TOTAL SBAP STAFF
Alabama	3.00	0	3.00	2.00*	0	0	2.00
Alaska	1.00	0.25	1.25	1.50	0	0	1.50
Arizona	0.25	0	0.25	2.25	0	0	2.25
Maricopa County	0	0	0	3.00*	0	0	3.00
Arkansas	1.00	1.00	2.00	6.50	0	0	6.50
California	5.00+	3.00+	8.00+	20.00	0	0	20.00
Kerns Cty	0.10	0.20	0.30	0	0	0	0
South Coast	7.00	1.00	8.00	2.00	0	0	2.00
Colorado	1.00	0	1.00	2.00	0	0	2.00
Connecticut	3.00*	0	3.00	1.00	0	0	1.00
Delaware	1.00	0	1.00	Ombudsman has dual role.			
District of Columbia	0.10	N/A	0.10	0.30	N/A	N/A	0.30
Florida	SBO & SBAP combined as one program.			2.50	0	0	2.50
Georgia	0.50	0.50	1.00	2.00	0	0.50	2.50
Hawaii	1.00	1.00	2.00	2.00	0	0	2.00
Idaho	1.00	0	1.00	1.00	0	0	1.00
Illinois	1.00	0	1.00	5.00	0	0	5.00

N/A Not applicable N/R No response

TABLE D-4
(Continued)

OR During 1997, the SBAP continued operating at a 1.35 FTE staffing level, or 1.0 FTE less than 1995. The program is expected to continue with 1.35 FTE in 1998. The lost position was reassigned in the Air Quality Division in 1995 and is involved with special education projects. The 1996 $96,430 annual budget reduction was partially offset by an EPA grant awarded to Region X (AK, ID, OR, WA) SBAPs. OR's share of the $200,000 ($150,000 Leadership + $50,000 105 Grant) is $25,000 each for 1996 and 1997, for a total of $50,000. A small surplus of grant money existed at the end of 1997 and was carried over into 1998. The leftover grant money will be spent by March or April 1998. The grant money is funding special projects through the Pacific Northwest Pollution Prevention Resource Center in Seattle, WA. The SBAP also spent $35,000 of EPA 105 Grant money on a NESHAP area source outreach project. $33,000 was carried over and will be spent in 1998 to complete this project. No other staff additions or reductions or revenues are anticipated in 1998.

PA The reduction in the 1997 budget resulted from the SBO being in office only 5 months and the SBAP participating in fewer activities than expected.

PR Title V revenues were lower than projected. Title V staff were used in assisting small business.

RI 1996 SBAP budget includes P2 personnel assigned to small business assistance. Increase due to hiring a full time Principal Environmental Planner.

TN TN experienced a reduction in force during the fiscal year. Two unfilled positions assigned to the program were eliminated. An account clerk position, which was unfilled and determined not to be needed by the program, was abolished. An administrative services assistant 3 position was transferred to another division within the department. The department has provided an administrative services assistant 5 position to the Pollution Prevention/Environmental Awareness Division where the technical assistance program is housed. This position, although not funded through the SBTCAP, provides program support.

TX State appropriations reduced.

UT Significant changes in SBO spending are a result of changes in the Department. These changes include a FTE change in the SBO from 1.0 FTE to 0.5 FTE and a pending contract for consultant services. SBO spending increases will to be coming from the EPA "Partnership for Compliance" Grant.

VT In December 1996, a full time employee was hired as the Small Business Compliance Advisory Program Engineer. This marks the first time a full time employee was hired specifically to assist small businesses. The money to fund this position was allocated by the State of VT. In October 1997, the CAP met for the first time. Prior to and since the meeting, DEC staff have allocated a portion of their time to CAP-associated work efforts.

WV SBAP budget has fluctuated due to personnel changes.

WI Greater time allocation.

TABLE D-4
(Continued)

FL The change from 1996 to 1998 was due to the reorganization of the SBAP. The program previously consisted of 3 FTEs, and now it consists of 2.5 FTE at a difference pay grade from 1996 figures. Projected increase is due to salary increases and raises of SBAP staff.

IL SBAP difference in amounts results from the difference of approved budget and actual expenditures.

IA In FY96, $10,000 was allotted for a special project. In FY97, the SBO position was retained by a different state agency (IA Department of Economic Development) as part of the Regulatory Assistance Team, increasing the budget allocation for FY97 and FY98. SBAP funding increase is for web site development and maintenance, special projects, computer upgrades, and moving expenses.

MA In last year's SBAP Annual Report, we listed 0.8 FTEs for the SBTCP activity. This year, we have changed the mix, estimating 1.2 FTEs (40% SBAP manager, 80% program assistant). This year, the program manager has had to spend more time on industry-specific projects (both interagency and OTA-specific), leaving more day-to-day operations of the SBAP function to the program assistant. MA/DEP continues to report fewer than expected Title V permits, due in part to many companies filing for Restricted Emission Status (FESOP program). However, with the establishment of the Business Compliance Unit at DEP, we expect a program to formalize working agreements between DEP and OTA will be developed.

MI SBTCP funding is based on collected air permitting fees. Since the fee structure was put in place in 1995, the level of fees collected for each aspect of the SBTCP has continued to decrease. Between FY 96 and FY 97, the amount of fees collected and allocated toward the SBTCP has decreased 17.5%. It is anticipated that program funding will continue to decline based on a reduction in the amount of fees collected.

MN Change in staffing levels and grant funds.

MO The funding increased for 1998, because a federal grant was obtained to inform the public of the 112(r) requirements. Also, additional General Revenue funding was used to provide air assistance due to the amount of assistance requests received.

NV Budget changes from 1996 to 1997 were due to appropriation of the EPA Pollution Prevention Leadership grant, which was passed through to the UNR-BEP Program. The 1996 and 1997 budget information reflects actual expenditures, which include position vacancies; the SBAP technical assistance position was not filled until 1997, and the SBO position was vacant for 6 months in 1997 due to transfer of staff.

NJ Reduction in force bumped SBAP staff member to lower title and salary in 1996. Less than anticipated fees collected from Operating Permits in 1997.

NC During 1996, the Environmental Permit Information Center (EPIC) was started under the SBO, and funds were spent for office space, furniture, and equipment for opening this office. During 1997, some additional expense for equipment was spent for EPIC. This will not reoccur in 1998.

OH SBAP: No new employees were hired in 1997; 1998 budget reflects allowance for one additional staff member. SBO: Variations in available revenue, new staff added at end of 1997.

OK There was a significant increase in the 1997 budget, because the majority of the SBAP Leadership Grant was spent during this calendar year. Very little will be spent in 1998.

TABLE D-4
(Continued)

STATE OR TERRITORY	BUDGET FOR 1996 REPORTING PERIOD (1)				BUDGET FOR 1997 REPORTING PERIOD (1)				BUDGET FOR 1998 REPORTING PERIOD (1)			
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL
South Dakota	25,000	10,000	5,000	40,000	25,000	10,000	5,000	40,000	25,000	10,000	5,000	40,000
Tennessee°	800,000			800,000	800,000			800,000	800,000			800,000
Texas°	1,260,000 (FY)			1,260,000	1,296,849 (FY)			1,296,849	951,753 (FY)			951,753
Utah°	85,000	210,000	5,000	300,000	43,000	203,000	2,000	248,000	120,000	210,000	2,000	332,000
Vermont°	0	0	0	0	0	60,000	15,000	75,000	N/R	65,000	15,000	75,000
Virginia	10,000	180,000	5,000	195,000	10,000	175,000	5,000	190,000	10,000	140,000	5,000	155,000
Virgin Islands	0 (Inactive)	65,000	0 (Inactive)	65,000	55,000	55,000	N/R	110,000	55,000	65,000	5,000	125,000
Washington	40,000	200,000	5,000	245,000	40,000	200,000	5,000	245,000	40,000	200,000	5,000	245,000
West Virginia°	55,000	100,000	5,000	160,000	60,000	140,000	5,000	205,000	55,000	140,000	5,000	200,000
Wisconsin°	15,000	117,000	3,000	135,000	30,000	117,000	3,000	150,000	40,000	117,000	3,000	160,000
Wyoming	25,000	75,000	10,000	110,000	25,000	75,000	10,000	110,000	25,000	75,000	10,000	110,000

°Notes, including explanations of significant changes (more than 10%) in funding levels among the 1996, 1997, and 1998 budget periods:

AR The Ombudsman is being separated from the Small Business Assistance Function. The SBAP is being consolidated with the Customer Service Division and likely expanded.

Maricopa Cty, AZ The difference in budget includes changes in salaries, equipment, and training.

South Coast The Small Business Assistance Officeincreased its staffing from 9 to 10 with the transfer of an Office Assistant in July 1997. Also, $50,000 was added to the 1997-98 budget to increase business outreach.

CO The Ombudsman's office was moved from the Office of Regulatory Reform to the CO Department of Public Health and Environment (CDPHE) in July 1997. The legislature did not designate a 1998 budget for the new Ombudsman at CDPHE.

CT Program funding has remained constant at $325,000. Resources have been reallocated to provide program support and expansion on specific program initiatives such as the grant project for metal finishing or outreach on Title V. While the level of funding has remained constant, existing available resources have been shifted within the Bureau of Air Management to provide additional program support as necessary.

DC Funding increase for 1998 due to establishment of CAP. Source is Title V fees.

N/A Not applicable N/R No response

TABLE D-4
(Continued)

STATE OR TERRITORY	BUDGET FOR 1998 REPORTING PERIOD ($)				BUDGET FOR 1997 REPORTING PERIOD ($)				BUDGET FOR 1996 REPORTING PERIOD ($)			
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL
Louisiana	0 (Funded by other programs.)	400,000	0	400,000	0	400,000	0	400,000	0	400,000	0	400,000
Maine	40,000	75,000	As needed (neg.).	115,000	40,000	75,000	As needed (neg.).	115,000	40,000	75,000	As needed (neg.).	115,000
Maryland	3,500	61,000	0	64,500	3,500	61,000	N/A	64,500	3,500	61,000	0	64,500
Massachusetts*	N/A	50,000	N/A	50,000	N/A	50,000	N/A	50,000	N/A	50,000	N/A	50,000
Michigan*	100,000	470,000	0	570,000 (FY 98)	65,000	420,000	0	485,000 (FY 97)	70,000	415,000	0	485,000 (FY 98)
Minnesota*	70,000	315,000	1,000	386,000 (FY 97)	70,000	250,000	1,000	321,000 (FY 98)	70,000	250,000	1,000	321,000 (FY 99)
Mississippi	150,000	150,000	5,000	305,000	150,000	150,000	5,000	305,000	150,000	150,000	5,000	305,000
Missouri*	50,000	330,000	10,000	380,000	50,000	345,000	10,000	395,000	55,000	440,000	10,000	505,000
Montana	80,000	99,000	2,000	181,000	80,000	99,000	2,000	181,000	N/R	N/R	N/R	N/R
Nebraska	N/R	105,000	N/R	105,000	0	105,000	0	105,000	N/R	105,000	N/R	105,000
Nevada*	52,500	52,500	3,000	107,000	77,103	164,812	2,423	244,338	92,272	168,812	2,800	263,884
New Hampshire	25,000	75,000		100,000	25,000	75,000		100,000	25,000	75,000		100,000
New Jersey*	80,000	60,000	1,500	141,500	80,000	50,320	1,500	131,820	80,000	62,000	1,500	143,500
New Mexico	10,000	205,000	<1,000	216,000	10,000	205,000	<1,000	216,000	10,000	205,000	<1,000	216,000
New York	1,170,000	1,000,000	N/A	2,170,000	1,170,000	1,000,000	4,000	2,174,000	1,170,000	1,000,000	4,000	2,174,000
North Carolina*	324,000		5,000	329,000	307,000		3,000	310,000	297,000		3,000	300,000
North Dakota	30,000	30,000	1,000	61,000	30,000	30,000	1,000	61,000	30,000	30,000	1,000	61,000
Ohio*	175,000	225,000	N/R	400,000	152,000	235,000	N/R	387,000	210,000	345,000	N/R	555,000
Oklahoma*	10,000	120,000		130,000	10,000	142,314		152,314	10,000	132,000		142,000
Oregon*	31,756	86,430	2,120	120,306	33,344	80,752	2,226	126,322	35,011	97,750	2,337	135,098
Pennsylvania*	185,000 (40,000 actual)	460,000	10,000	511,000	35,000	300,000	5,000	340,000	105,000	400,000	7,500	515,000
Puerto Rico*	Inactive.	20,000	Inactive.	20,000	15,000	188,000	10,000	223,000	15,000	75,000	10,000	100,000
Rhode Island*	49,000	90,000	N/R	139,000	49,000	110,000	0	159,000	49,000	115,000	0	164,000
South Carolina	35,000	85,000	1,500	121,500	35,000	85,000	1,500	121,500	N/R	N/R	N/R	N/R

N/A Not applicable N/R No response

TABLE D-4
COMPARISON OF 1996, 1997, AND 1998 BUDGETS
and
DESCRIPTIONS OF SIGNIFICANT FUNDING CHANGES

STATE OR TERRITORY	BUDGET FOR 1996 REPORTING PERIOD ($)				BUDGET FOR 1997 REPORTING PERIOD ($)				BUDGET FOR 1998 REPORTING PERIOD ($)			
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL
Alabama	165,000	50,000	N/R	215,000	165,000	165,000	N/R	330,000	175,000	165,000	N/R	340,000
Alaska	Budgets combined.			112,700	Budgets combined.			112,700	Budgets combined.			112,700
Arizona	Budgets combined.			165,000	Budgets combined.			165,000	Budgets combined.			165,000
Maricopa County*	N/R	135,000	N/R	135,000	N/R	140,000	N/R	140,000	N/R	145,000	N/R	145,000
Arkansas*	73,132	89,843	2,100	164,875	78,210	233,068	1,564	312,842	80,000	200,000	2,000	282,000
California	200,000	340,000	0	540,000	200,000	340,000	5,000	545,000	200,000	340,000	5,000	545,000
Kerno Cty	10,000	10,000	N/A	20,000	10,000	10,000	N/A	20,000	10,000	10,000	N/A	20,000
South Coast*	Budgets combined.		N/A	1,200,000	Budgets combined.		N/A	1,210,000	Budgets combined.			1,210,000
Colorado*	90,000	120,000	0	210,000	90,000	120,000	0	210,000	90,000	120,000	0	210,000
Connecticut*	Budgets combined.			325,000	Budgets combined.			325,000	Budgets combined.			325,000
Delaware	Budgets combined.			80,000	Budgets combined.			80,000	Budgets combined.			80,000
District of Columbia*	5,000	8,000	Did not exist.	13,000	5,000	8,000	Did not exist.	13,000	5,000	8,000	2,000	15,000
Florida*	Budgets combined.			150,000	Budgets combined.			140,000	Budgets combined.			115,000
Georgia	65,000	115,000	10,000	190,000	65,000	115,000	10,000	190,000	65,000	125,000	10,000	200,000
Hawaii	Did not exist.			0	N/R			0	N/R			0
Idaho	65,000	30,000	5,000	100,000	65,000	30,000	0	95,000	65,000	30,000	0	95,000
Illinois*	70,000	255,000	0	325,000	70,000	325,000	0	395,000	75,000	350,000	5,000	430,000
Indiana	150,000	700,000	3,000	853,000	150,000	700,000	3,000	853,000	150,000	700,000	3,000	853,000
Iowa*	84,500	310,000	0	394,500 (FY96)	81,000	362,000	N/A	443,000 (FY97)	81,000	378,000	0	459,000 (FY98)
Kansas	125,000	335,000	No budget, travel only.	460,000	125,000	335,000	No budget, travel only.	460,000	125,000	335,000	No budget, travel only.	460,000
Kentucky	107,000	250,000	2,000	359,000	112,757	250,000	2,000	364,757	118,781	262,500	2,000	383,281
Jefferson Cty	50,000	80,000	See KY	130,000	40,000	85,000	See KY	125,000	40,000	85,000	See KY	125,000

N/A Not applicable N/R No response

TABLE D-3
(Continued)

STATE OR TERRITORY	BUDGET ($)				SOURCE OF FUNDING		
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP
Virginia	10,000	175,000	5,000	190,000	General funds.	Permit fees, general fund, federal trust, EPA Leadership grant.	Permit fees, general fund, and federal trust.
Virgin Islands	55,000	55,000	N/R	110,000	Title V fees.		N/R
Washington	40,000	200,000	5,000	245,000	Title V fees.		
West Virginia	60,000	140,000	5,000	205,000	Title V fees and agency penalties.		Agency penalties (reimbursements only - actual expenses <1,000)
Wisconsin	30,000	117,000	3,000	150,000	General purpose revenue	Program revenue (permit fees).	
Wyoming	25,000	75,000	10,000	110,000	Title V fees.		

*Notes:

NV State program only. The Clark County Health District, Air Quality Program, and the Washoe County District Health Department Air Quality Program have staff in their compliance and permitting branches that provide assistance to small businesses. However, these programs are not formal small business assistance programs. Budget information is not available for these programs.

Air Quality Management Funds are through the air quality permit fees.

PA SBO in office for only 5 months.

RI SBO budget includes salary, fringe benefits, and travel. 75% of SBO time is spent on small business; budget reflects this. SBAP budget includes 2 FTEs (Environmental Planner and Principal Environmental Planner, who started employment 4/97) and ½ FTE (Research Associate).

N/A Not applicable N/R No response

TABLE D-3
(Continued)

STATE OR TERRITORY	BUDGET ($)				SOURCE OF FUNDING		
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP
New Mexico	10,000	205,000	<1,000	216,000	Title V fees, other state funds.	Title V fees, grants, other state funds.	Title V fees, other state funds.
New York	1,170,000	1,000,000	4,000	2,174,000	New York State Clean Air Fund supported by Title V fees.		
North Carolina		307,000	3,000	310,000	Title V fees.		
North Dakota	30,000	30,000	1,000	61,000	Title V fees.		
Ohio	152,000	235,000	Included in SBAP budget.	387,000	Title V fees, OAQDA funds.	Title V fees.	
Oklahoma	10,000	142,314	Included in SBAP budget.	152,314	Agency indirect costs.	Title V fees, EPA Leadership Grant.	
Oregon	33,344	90,752	2,226	126,322	Title V fees.		
Pennsylvania	35,000*	300,000	5,000	340,000	Title V fees.		
Puerto Rico	15,000	198,000	10,000	223,000	Title V fees.		
Rhode Island	49,000*	110,000*	0	159,000	State general fund.	Title V fees.	N/A
South Carolina	35,000	85,000	1,500	121,500	Title V fees.		
South Dakota	25,000	10,000	5,000	40,000	Title V fees.		
Tennessee	Budgets combined.			800,000	Title V fees.		
Texas	Budgets combined.			1,296,849 (FY)	151 funds.		
Utah	43,000	203,000	2,000	248,000	Title V fees, EPA "Partnership for Compliance" grant	Title V fees, DEQ P2 Program grant.	Title V fees.
Vermont	0	60,000	15,000	75,000	N/R	State of VT	

N/A Not applicable N/R No response

TABLE D-3
(Continued)

STATE OR TERRITORY	BUDGET ($)				SOURCE OF FUNDING		
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP
Massachusetts	N/A	50,000	N/A	50,000	N/A	MA Toxics Use Reduction Act (TURA), which was created by OTA, provides for fees to be paid by large quantity toxics users. TURA mandates OTA to provide assistance to small quantity toxics users.	N/A
Michigan	65,000	420,000	0	485,000 (10/96-9/97)	State & county fees, restricted funds.		Unfunded.
Minnesota	70,000	250,000	1,000	321,000 (FY 98)	Air fees, Act 105 grant.	Air fees, Act 105 grant, P2 demonstration grant, SBREFA 215 grant.	Air fees, Act 105 grant.
Mississippi	150,000	150,000	5,000	305,000	Title V fees.		
Missouri	50,000	345,000	10,000	395,000	Title V fees & other fees.	Title V fees, general revenue, federal grant.	Title V fees.
Montana	80,000	99,000	2,000	181,000	Air quality permit fees.		
Nebraska	0	105,000	0	105,000	Same as SBAP person.	Title V fees.	N/R
Nevada*	77,103	164,812	2,423	244,338	Indirect cost pool.	Indirect cost pool & federal grant (PPL).	Air Quality Management Fund.*
New Hampshire	25,000	75,000	Combined.	100,000	Emission fees.		N/A
New Jersey	80,000	50,320	1,500	131,820	Operating permit fees.		

N/A Not applicable N/R No response

TABLE D-3
(Continued)

STATE OR TERRITORY	BUDGET ($)				SOURCE OF FUNDING		
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP
Hawaii	N/R	N/R	N/R	N/R	Title V fees.		
Idaho	65,000	30,000	0	95,000	Title V fees.	Title V fees, air base grant.	N/A
Illinois	70,000	325,000	0	395,000	GRF	Title V fees.	Title V fees.
Indiana	150,000	700,000	3,000	853,000	Special fund, permit fees, general revenues.		Legislature.
Iowa	81,000	362,000 (7/97-6/98)	N/A	443,000	Title V fees.		N/A
Kansas	125,000	335,000	Travel only.	460,000	Air fee funds.		N/R
Kentucky	112,757	250,000	2,000	364,757	Title V fees.		
Jefferson County	40,000	85,000	See KY.	125,000	EPA 105 grant & general funds.		N/R
Louisiana	0	400,000	0	400,000	Funded by other programs.	EPA 105 grant ($240K), self-generated ($160K)	N/A
Maine	40,000	75,000	As needed (negligible).	115,000	Fees from Toxic Use Reduction program.	Title V fees.	Fees from Toxic Use Reduction program.
Maryland	3,500	61,000	N/A	64,500	MDE indirect funds.		N/A

N/A Not applicable N/R No response

TABLE D-3
1997 SBTCP BUDGET INFORMATION AND FUNDING SOURCES

STATE OR TERRITORY	BUDGET ($)				SOURCE OF FUNDING		
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP
Alabama	165,000	165,000	N/R	330,000	Title V fees; air, water, & RCRA grant funds	Title V fees, permit fees	
Alaska	Budgets combined.			112,700	All funds come from the AK Clean Air Protection fund that was established to fund Title V programs.		
Arizona	Budgets combined.			165,000	Air quality permit fees.		
Maricopa County	N/R	140,000	N/R	140,000	N/R	Permit fees	N/R
Arkansas	78,210	233,068	1,564	312,842	State appropriations, educational fund, and federal grants.		
California	200,000	340,000	5,000	545,000	State Budget Act.		
Kerns Cty	10,000	10,000	N/A	20,000	KCAPCD permit fee revenues.		
South Coast	Budgets combined.		N/A	1,210,000	Emissions fees, permit fees, annual operating fees, subvention funds.		N/A
Colorado	90,000	120,000	0	210,000	CO Dept. of Public Health & Env. permitting & annual fees.		N/A
Connecticut	Budgets combined.			325,000	Funds for the program are appropriated from a state fund that supports a number of programs related to implementing the Clean Air Act in CT. Vehicle registration fees provide the funding source for CT's clean air program. Title V fees are used for costs incurred as a result of Title V permitting activities.		
Delaware	Budgets combined.			80,000	Title V fees.		
District of Columbia	5,000	8,000	Does not exist.	13,000	Air grant.	Air grant/Title V fees.	N/R
Florida	Budgets combined.			140,000	Title V fees.		
Georgia	65,000	115,000	10,000	190,000	Title V fees.		

N/A Not applicable N/R No response

TABLE D-2
(Continued)

*Notes:

SCAQMD SBO and SBAP are combined.

MA SBAP established 11/93 pursuant to the 11/92 SIP revision.

Multimedia technical assistance to small business had been occurring in the Commonwealth since 1989 through OTA and the DEP. While the structure of the MA SBAP is not identical to the Section 507 program design, services have been provided on a free and confidential basis as part of the Commonwealth's Toxics Use Reduction program. In addition, a reorganization at DEP has established a "Business Compliance Unit," which does outreach, permitting, inspections, and enforcement on a multimedia basis. Business leaders, large and small, are invited to meet every month with Trudy Coxe, Secretary of Environmental Affairs, and their concerns are communicated to OTA and DEP staff for appropriate response.

MO First meeting planned for late April 1998.

TABLE D-2
(Continued)

STATE OR TERRITORY	MONTH & YEAR OF ESTABLISHMENT			MONTH & YEAR OPERATIONS BEGAN		
	SBO	SBAP	CAP	SBO	SBAP	CAP
North Dakota	4/92	4/92	5/92	4/92	4/92	6/93
Ohio	10/94	10/94	10/94	12/94	4/95	1/96
Oklahoma	6/94	6/94	6/96	10/94	10/94	6/96
Oregon	8/91	8/91	1/94	1/92	11/91	11/94
Pennsylvania	11/92	11/92	11/92	5/93	1/94	4/93
Puerto Rico	10/97	11/94	1/96	10/97	11/94	3/96
Rhode Island	5/95	11/96	N/E	5/95	11/95	N/O
South Carolina	8/93	8/93	8/94	8/93	8/93	8/94
South Dakota	11/93	11/92	4/94	11/93	11/92	4/94
Tennessee	1/93	1/93	1/93	3/93	11/93	N/O
Texas	2/92	1/92	11/92	2/92	1/92	11/92
Utah	1/94	1/94	1/94	5/94	1/93	6/95
Vermont	N/E	12/96	8/97	N/O	12/96	10/97
Virginia	8/92	3/93	11/95	4/93	7/93	11/95
US Virgin Islands	1/93	1/93	N/E	1/93	1/93	N/O
Washington	Fall 92	Summer 93	Summer 93	Fall 92	Summer 93	Summer 93
West Virginia	4/94	11/93	1/95	12/94	5/94	3/95
Wisconsin	4/92	4/92	4/92	11/92	12/92	8/94
Wyoming	3/92	3/92	3/92	5/94	11/93	5/95

N/A Not applicable N/E Not established
N/O Not operational N/R No response

TABLE E-8
(Continued)

*Other:

CO	Attended presentation of annual report to CO Air Quality Control Commission.
MT	Advised on creation of small business loan program.
OR	Sponsored educational workshops for small businesses, vendors, and other shareholders. Helped SBAP initiate inclusion of regulatory information in community college curricula.
PA	Ombudsman position was filled in 1997.
UT	Lt. Governor Small Business Advisory Council.
WY	New CAP appointee nominations.

**Additional comments:

South Coast, CA	SCAQMD is a regional regulatory agency permitting approximately 30,000 sources. We are the largest of the 34 air districts in CA. We have historically used industry, community, and environmental group input into our programs. A CAP-like committee, known as the Local Government and Small Business Assistance Advisory Group recently has been formed. The Group will have its first meeting in January 1998 and will deal with the issues listed in the table above.
DE	CAP was not operational in 1997. First scheduled meeting is 2/98.
DC	CAP was appointed but did not meet during 1997.
MA	In addition to the monthly meetings held by Secretary of Environmental Affairs, each of five regional technical assistance teams has an advisory committee, which is made up of area business and civic leaders. Each of these groups communicate interests and concerns to OTA.
MN	The CAP currently is dormant due to a pending reorganization of the MPCA.
NY	Elected CAP chair at first meeting, 8/97. 2 CAP members attended 9/97 CAP training session.
NC	Inactive. Waiting appointment of 4 new members. Changes in leadership delayed the appointment process.
OH	Training sessions: 1 member. Met with small businesses/associations on an individual basis.
OK	Chair attended EPA training.

TABLE E-9
MEETINGS AMONG SBO, SBAP, AND CAP

FREQUENCY	SBO & SBAP	SBO & CAP	SBO, SBAP, & CAP	SBAP & CAP
Daily	AK, CT, GA, KS, ME, MT, NV, NH, NC, SC, VA, VI, WA, WI, WY			
Weekly	CA, IL, ND, WV			
Bimonthly	AZ, SCAQMD, CO, DC, MN, TN, UT	MT, WI	WI	WI
Monthly	ID*, Jefferson, LA, NJ, NM			
Quarterly	AL, IN, IA, KY, NY, OH, RI	CT, GA, IN*, KS, KY, Jefferson, ME, NV, PA	CO, CT, GA, IN*, KY, LA, ME, MS, NV, NJ, PA, UT, VA, WY	CT, GA, IN*, KY, LA, ME, NV, OR, PA
Biannually	MS,	LA, ND, WV	FL, MT, NE, NY, ND, SD, TX, WV	ND, VT, WV
Annually	Maricopa, OK	NM,	KS, NM	MT, NM
Occasionally	MD, MI, OR, PA, SD	MI, NH, NC, OR, SD, VA	MI, NC, OR	MI, NC, OK, PR, SD, VA
Other**		AK, AR	AK, AR, OH	AK, AR

*Notes:

County programs not counted separately.

DE No response.
HI Not applicable.
ID Established monthly meetings, but only met 3 times during reporting period.
IN Met once during the year due to scheduling conflicts. Typically meets quarterly.
MA Not applicable.
MO Did not meet in 1997, but SBO/CAP/SBAP and SBAP/CAP will meet quarterly in 1998.
NV 7 meetings with SBO/SBAP and contractors - 3 with BEP-UNR and 2 each with Washoe and Clark Counties.

**Other:

AK Every 4 months (3 per year).
AR Every 4 months (3 per year).
OH Every 2 months.

TABLE E-10
FINANCIAL ASSISTANCE PROGRAMS TO HELP SMALL BUSINESSES COMPLY WITH CAA REQUIREMENTS

PROGRAM	DATE AVAILABLE	NAME OF GRANT/LOAN	FUNDING LEVEL
Alabama	None		
Alaska	None		
Arizona	None		
Maricopa Cty	None		
Arkansas	10/97	Revolving Loan Program	$1 million
California	1972	CA Pollution Control Financing Authority	$6.8 billion in bond sales with projects ranging from $10,000-$500,000
	1991	Air Quality Assistance (funded by South Coast Air Quality Management District)	$1 million remaining (sunsets 1999)
	1995	Innovative Clean Air Technologies	$1 million/year
Kerns Cty	None		
South Coast*	1991	AQAF Loan Guarenty	$1,750,000
	1992	CLEAN (state's portion)	$3,000,000 ($750,000 from AQAF)
Colorado	None		
Connecticut*	1994	Financial Assistance for Vapor Recovery (revolving loan fund)	$1 million
Delaware	None		
District of Columbia	None		
Florida	None in 1997*		
Georgia	None		
Hawaii	None		
Idaho	None		

TABLE E-10
(Continued)

PROGRAM	DATE AVAILABLE	NAME OF GRANT/LOAN	FUNDING LEVEL
Illinois	None in 1997*		
Indiana	None		
Iowa	None in 1997*		
Kansas	None		
Kentucky	None		
Jefferson Cty	None		
Louisiana	None in 1997*		
Maine	None		
Maryland	None		
Massachusetts	None		
Michigan	None		
Minnesota	7/97	Small Business Environmental Improvement Loan Program	$750,000
Mississippi	None		
Missouri	None		
Montana	None in 1997*		
Nebraska	None		
Nevada	None		
New Hampshire	None		
New Jersey	None		
New Mexico	None		

TABLE E-10
(Continued)

PROGRAM	DATE AVAILABLE	NAME OF GRANT/LOAN	FUNDING LEVEL
	9/97	Empire State Development Linked Deposit Program (interest rate buy-down)	
New York	11/96	Environmental Bond Act	$30 million
North Carolina	None		
North Dakota	None		
Ohio	Current	Small Business Assistance Fund	Based on Title V fees@$0.50/ton
Oklahoma	None		
Oregon*	None		
Pennsylvania	1/94, 7/96	Small Business First Fund*	$3 million
Puerto Rico	None		
Rhode Island	None		
South Carolina	None in 1997*		
South Dakota	None		
Tennessee	None		
Texas	None		
Utah	None		
Vermont	None		
Virginia	None in 1997*		
Virgin Islands	None		
Washington	None		
West Virginia	None in 1997*		
Wisconsin	None in 1997*		

TABLE E-10
(Continued)

PROGRAM	DATE AVAILABLE	NAME OF GRANT/LOAN	FUNDING LEVEL
Wyoming	None		

*Notes:

South Coast A loan guaranty program, which is supported by the Air Quality Assistance Fund (AQAF), is avaiable to small businesses located in Los Angeles, Orange, and portions of Riverside and San Bernardino Counties. These are not loans, but guaranties of repayment to lenders. This program was established to offer a comprehensive technical and financial assistance program to small businesses to satisfy clean air requirements.

CT Loan guarantee program established in 1994. Preliminary work is underway to expand the program to make financial assistance generally available for small business environmental compliance.

FL Proposed legislative amendment will be considered during the 1998 session. This legislation would create the "Florida Air Pollution Prevention Grant Program." It is intended to grant funds to offset the cost of implementing pollution prevention measures. Funding level is expected to be $275,000.

IL Two grant programs are expected to be operational 11/98: a Pollution Prevention Grant Program with a funding level of $150,000, and a Pollution Prevention Loan Program with a funding level of $2 million.

IA In late 1998, a loan program is expected to be established; funding level is undetermined.

LA Grant or loan program planned.

MT Small Business Energy and Environmental Loan Program (funding level $660,000) planned for 1/98.

OR Perchloroethylene dry cleaners, chrome platers, and businesses using NESHAP halogenated solvents qualify for pollution prevention tax credits. SBAP also assists businesses in securing federal SBA and State Economic Department loans.

PA The Air Quality Improvement Fund became available in January 1994 and subsequently was rolled into the Small Business First Fund on July 1, 1996.

SC Grant or loan planned.

VA Authority to create a Small Business Environmental Compliance Assistance Loan Fund was created by the legislature. Framework and parameters of the loan program being established with implementation projected for late 1998.

WV Small Business Environmental Loan (funding level $2 million revolving) planned for mid-1998.

WI WI Housing and Economic Development Agency Linked Deposit Loan Subsidy (funding level $10,000 to $99,000) planned for 1/98.

TABLE E-11
COOPERATIVE EFFORTS

Descriptions of how each component of the SBTCP has developed cooperative efforts among existing personnel resources (within the state) are provided in Table E-11.

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Alabama	N/R	Funded through Title V program.	N/R
Alaska	Works with Department of Commerce to reach more small businesses. Participates in regional and national P2 roundtables. Participating in Governors Council on Small Business Assistance Programs to eliminate possible duplication of efforts and to have better coordination and referrals between agencies. Also works with AK SBDC and MEPs.	Works with Air Program to ensure that efforts are not duplicated. Work with local businesses to review information that affects them.	SBO/SBAP uses the CAP to review fact sheets and other Departmental information. CAP members are from all parts of the state. Their names, addresses, and phone numbers have been put in different forms to allow businesses and concerned citizens to contact individual CAP members regarding Department activities.
Arizona	Agency ombudsman assists with complaints from small businesses.	Agency permitting engineers and compliance inspectors frequently refer businesses to SBAP and assist with workshops, training sessions, publication development, etc.	Agency representative to the CAP is the Deputy Director of the Agency.
Maricopa Cty	N/R	Partner with a local Community College and use student interns for various projects. These interns are in the Environmental program. For example, a MACT guide (for understanding) was produced by college interns, and they will assist with the SBO/SBAP meeting in 1998.	N/R
Arkansas	Salaries come from grant programs and state appropriations.	Salaries come from grant programs and state appropriations.	N/R
California	Outreach efforts are coordinated with other public agencies, trade associations, chambers of commerce, local government representatives, etc. Outreach ideas and materials are shared with other SBAPs, AWMA, and statewide CA Air Pollution Control Officers Association.	A number of local districts assist one day per week at Cal/EPA permit assistance centers. District staff provide countertop displays in city and local government, business assistance, and permit services areas to refer customers to the Districts. Districts larger than 250,000 people assign a single point of contact to assist businesses.	To be operational in 1998.
Kerns Cty	Work with planning and economic development departments.	Work with planning and economic development departments.	N/A

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
South Coast	SCAQMD staff is assigned to assist one day per week at Cal/EPA permit assistance centers. Outreach efforts are coordinated with other public agencies, trade associations, chambers of commerce, local government representatives, and agency staff. Outreach ideas and materials are shared with other SBAPs, AWMA, and statewide CA Air Pollution Control Officer's Association. Public Advisor participates with other states in activities coordinated through U.S. EPA's SBO.	SCAQMD staff is assigned to assist one day per week at Cal/EPA permit assistance centers. AQMD provides counter-top displays in city and local government, business assistance, and permit service areas to refer customers to the AQMD's toll free line.	SCAQMD is working with other state and local programs to obtain ideas on how to make a CAPO-type program work at a regional level. Our governing board recently appointed a Local Government and Small Business Assistance Advisory Group.
Colorado	1 FTE funded by Title V funds from CO Department of Public Health & Environment, Air Pollution Control Division.	2 FTE funded by Title V funds from CO Department of Public Health & Environment, Air Pollution Control Division. Staff educates small business owners, internal staff (permit engineers, enforcement personnel) and outside agencies about air pollution issues.	7 members. CO CAP members are not compensated for their service. Meetings are held at various members' places of business and state offices on a rotating basis.
Connecticut	CT's SBO and SBAP are merged, and collectively the program leverages technical staff from within the Air Bureau to provide compliance assistance on air quality issues. The program has used staff from other Bureaus within the Department to provide multimedia assistance when requested. The program can access technical staff within the Air Bureau on a regular basis to provide permitting assistance, to help with the development of informational materials and fact sheets, and to participate in outreach events around the state. The SBO position is designated out of the Office of the Assistant Commissioner to enhance the multimedia capabilities of the SBAP. Additional resources are leveraged through partnerships with trade associations, quasi-public agencies, other state agencies, public utilities, local chambers of commerce, and programs established at CT universities. SBAP has established effective partnerships with trade associations and vendors representing the autobody, metal finishing, and gasoline industries.		CT's CAP consists of 10 members. Other interested individuals attend meetings regularly and serve as non-voting members. The CAP has helped to establish relationships with the small business community and to publicize the availability of the SBAP.
Delaware	Ombudsman has access to technical personnel in engineering and compliance for answering technical questions, assisting in completing permit applications, and interpreting regulations.	Ombudsman serves dual role.	N/R
District of Columbia	N/R	Formed partnership with compliance inspectors to distribute brochures to small businesses.	N/R
Florida	N/R	SBAP relies upon the department's district air inspectors in providing compliance assistance with air regulations. SBAP continues its partnership with the Small Business Development Centers and the FL Manufacturing Technology Centers.	Encouraged the members to help promote and provide feedback to and from respective industries and affiliations.

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Georgia	SBO is now a part-time position. SBO retired in October from the Division and was reappointed to work part-time. A secretary supports the SBAP part-time.	2 Environmental Protection Division full time associates. 1 retired engineer works part-time.	N/A
Hawaii	N/A (Plan to maintain activity within Department of Health.)	N/A (Plan to maintain activity within Department of Health.)	N/A (Support of activity by Department of Health.)
Idaho	SBO has worked extensively with the Department of Commerce, Small Business Development Centers, TechHelp, and the Division of Environmental Quality's Pollution Prevention Coordinator. In the past, vendors, INEL representatives, local POTW managers, ID's universities, banking representatives, and DEQ regional office personnel have been utilized. Also, the SBO has worked closely with the other Region X states (WA, OR, AK) to discuss common problems and entered into an agreement with the Pollution Prevention Research Center to provide assistance with P2 issues under a leadership grant, which is managed by WA.	SBAP works with all sections of the DEQ to get correct and complete information to businesses. They also work with professionals in other media to make sure that cross media concerns are addressed.	N/A
Illinois	SBO has access to 1,200 employees of the IEPA for their expertise.	Being a part of the IL Small Business Development Center Network, we have access to small businesses through 53 centers across the state. In addition, we have established working relationships with many business groups including NFIB, Printing Industry of IL, State Fabricare Association, State Chamber of Commerce, Manufacturers Association, Automotive Wholesalers, and local economic development organizations.	N/A
Indiana	SBO has extensive support from the Office of Air Management.	CTAP has extensive support from the Office of Air Management.	N/A
Iowa	SBO is an integral part of the IA Department of Economic Development's Regulatory Assistance program. SBO has access to all IDED databases and information including boards, meetings, and memberships.	IAEAP uses part time and full time student assistants and interns from the University of Northern Iowa to help with client assistance and program management.	N/R

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Kansas	SBO assists with P2 issues, edits division newsletter, organizes annual environmental conference, coordinates dissemination of division compliance publications, works with assistance providers in other states/federal agencies.	Technical assistance program is closely aligned with the P2 assistance program. In the future, these two programs will be even further integrated to facilitate a comprehensive P2/assistance program.	N/R
Kentucky	Air Quality Representative for Small Business (AQRSB) is a member of the KY Environmental Partnership, a group of agencies that want to improve assistance to small businesses on environmental issues. Division for Air Quality (DAQ) has designated several people to assist AQRSB im completing requests and drafting column for state newsletters. AQRSB is participating in Department for Environmental Protection Strategic Planning process that provides an opportunity to exchange ideas on public information and education with others in the Department.	KBEAP uses training and seminar facilities of the UK Center for Entrepreneurship network. SBEAP pursues opportunities to speak and provide training at trade shows and other conferences utilizing a "captive audience" approach. KBEAP works closely with DAQ on permitting and compliance issues to provide timely and accurate information, thereby avoiding repeating work. Finally, KBEAP communicates with other assistance providers for referrals and partnering on training and assessment activities.	Small Business Stationary Source Advisory Panel (SBSSAP) members have facilitated AQRSB and KBEAP work with other organizations. Chairman and vice-chairman also met with agency management to discuss expansion of the program to multimedia.
Jefferson County	Jefferson County's SBAP makes its resources of engineers, a library, and a meeting room and equipment available to the Ombudsman as needed.		
Louisiana	Office of the Secretary provides additional secretarial, outreach, and contact resources.	SBAP utilized the personnel of the Accident Prevention Section to assist in the preparation of presentations of the 112R program.	Utilizes the secretarial resources of the SBAP staff.
Maine	SBO works closely with SBAP and other business service providers such as the Department of Economic and Community Development and the ME Chamber of Business Alliance to maximize effectiveness.	SBAP is able to work with staff from the Department's Office of Innovation and Assistance and other bureaus to assist in some functions. SBAP also works with other business service providers such as the ME Small Business Development Centers to maximize effectiveness.	CAP is a joint panel comprised of 16 members. Functions of SBAP oversight were merged with an existing panel charged with overseeing the Toxics Use Reduction Program.

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Maryland	N/A	SBAP leverages extensive resource inside and outside MDE. 100% or air permit engineer's time is spent on small business air quality permits. There is a designated SBAP contact in each media administration to coordinate regulatory and permitting activities. All outreach projects are conducted jointly with MDE's Pollution Prevention Program. The 3 permitting engineers of MDE's Environmental Permit Service Center are designated resources for regulatory and permitting information. MDE's Office of Communications coordinated logistics for all outreach activities. Trade associations partner with the SBAP to host and advertise outreach seminars.	N/A
Massachusetts	SBO function is addressed by OTA's SBAP manager and by the 31 existing staff members, a team dedicated to multimedia P2 and toxics use reduction.	SBTCP currently operates primarily through the OTA structure. There are 5 regional technical assistance teams with 4 staff per team. Each of these teams deals with small business issues as they arise from their requests for technical assistance. All multimedia P2 (M2P2) activities are provided free and confidentially for all MA companies, regardless of size. Compliance assistance is an important (and increasing) part of our activities. However, because of legislative mandate (and funding priorities), companies needing assistance with programs or plans under the TURA program must receive first priority.	The Secretary and 5-10 of her top staff members meet monthly with business leaders. Other staff, including the Commissioner and Assistant Commissioner of DEP, attend as needed (several times per year).
Michigan	One FTE funded through state and county restricted fees. When fees fall short, the difference between expected and realized funding is pulled from the state's general fund.	Five FTEs funded through state and county restricted fees. When fees fall short, the difference between expected and realized funding is pulled from the state's general fund. Additionally, a number of project costs (e.g., marketing, bulk printing, etc.) Are offset through partnerships with regulatory agencies and private sector trade groups or recouped through fees (e.g., workshops, guidance publications, etc.).	Unfunded.
Minnesota	Coordinated with SBDCs and trade associations to have them help promote the MPCA's small business loan program. Staff from other internal and external media divisions serve on the screening/steering committee for the loan program.	Partnering and participation on internal and external multimedia workgroups. Coordinated industry and government partnering through Wood Finishers Leadership Grant and outreach to automotive repair and body shops.	CAP currently is dormant due to a pending reorganization of the MPCA.
Mississippi	N/R	N/R	N/R

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Missouri	Inquiries are sent to the Technical Assistance Program's Business Assistance Unit.	Some of the funding used to provide technical assistance to businesses comes from Grant Revenue. Additionally, the Department's regulatory programs answer questions from TAP, assist in writing Technical Bulletins, and cooperate with mailings.	The Business Assistance Unit of TAP provides support to the CAP.
Montana	Personnel from MT Department of Commerce help with outreach. Partnerships were made with MT State University Pollution Prevention Program and the U.S. Small Business Administration.	Personnel from MT Department of Environmental Quality, Air, and Waste Management Bureau help with technical assistance as needed. A partnership was made with the MT Manufacturing Technical Assistance Center.	N/R
Nebraska	There is only one person who provides activities for SBAP/SBO and CAP administration.	N/R	N/R
Nevada	SBO utilizes BAQ and other agency files to obtain information regarding issues that the ombudsman is investigating. SBO interviews staff with knowledge of a facility as well as facility personnel to establish a complete picture of an issue to determine solutions.	SBAP utilizes the expertise of NDEP staff in various environmental programs for technical information. SBAP works closely with UNR's Business Environmental Program to provide information and technical assistance to the business community and to coordinate dissemination of outreach materials and workshops. SBAP works closely with the county air pollution control programs for hands-on education of the various sources, identification of industry needs, and outreach activities. SBAP networks with other agencies having business assistance programs to coordinate outreach and technical assistance. NDEP Bureau of Air Quality provides direct assistance to businesses regarding permitting and compliance. Semi-annually, the BAQ conducts compliance workshops. BAQ staff members are given the task of presenting these workshops (typically 1 permitting and 1 compliance staff). Other workshops are presented as changes in federal and state regulations warrant.	CAP utilizes the information SBO and SBAP collect to determine needs within the business community and identify methods to support and assist small businesses. CAP members network with representatives from their individual areas of business and bring concerns before the SBO and SBAP. Issues are identified, and recommendations are made to the agency.
Clark Cty	Air Quality Program staff utilize direct mailings to affected businesses, Internet postings, workshops, public speaking, and various outreach materials (brochures and information packets). Permitting and enforcement personnel assist small businesses to comply with permitting, monitoring, and operation. Assistance is also given for P2 when appropriate.		
Washoe Cty	Air Quality permitting and enforcement staff provide assistance for small business im completing permits, monitoring, and compliance. Staff works closely with local business development centers and often meet with prospective NV businesses to identify environmental permits for the business should it locate within the county.		

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
BEP/UNR	BEP has operated the SQG Hazardous Waste Technical Assistance Program since 1987 and the Air Regulatory Assistance Program since 1995, both via contract with the NV Division of Environmental Protection. BEP has developed an extensive referral network with various trade associations, agency personnel, university personnel, and local development authority personnel.		
New Hampshire	Administrative support from Air Resources Division. Developed working relationships with other advocates for energy, environmental, legislative, and business issues.	Developed working relationships with DES Pollution Prevention Program and other internal assistance resources. Developed cooperative ventures with trade associations, the university system, and other technical assistance providers.	Administrative support from the Air Resources Division.
New Jersey	N/R	Coordinates with Air Permit, Air Enforcement, Air Planning, and P2 within DEP. Coordinates with NJ Institute of Technology Technical Assistance Program for P2. Works with trade associations.	N/R
New Mexico	SBO provides advocacy and referral services upon request by the SBAP, the CAP, or clients. These services have included small and large group meeting facilitation (regulated entities, environmental groups, citizen groups, etc.), public input and informational meetings and interventions on an individual level. Technical assistance, once determined, then is provided by various programs within the Environmental Department, including the SBAP.	Other agencies, such as Economic Development, Small Business Development Centers, and local environmental field offices, help with SBAP outreach. SBAP also networks with other bureaus to develop multimedia environmental management tools, workshops, and presentations for the printing, automotive, and manufacturing industries.	Legal assistance to CAP is provided by Mr. Bill Brancard, NM Assistant Attorney General.
New York	SBO works with NIST MEP program, equipment manufacturers, and trade associations to be sure that we are coordinated in our activities. In addition, SBO works with DEC P2 Unit to co-sponsor events to avoid duplicate outreach programs. Where policy issues arise, the Empire State Development Division of Policy and Research has assisted the SBO.	SBAP co-sponsors technical workshops with other providers of technical assistance, including local agencies, trade groups and associations, and DEC's P2 Unit to leverage outreach to industry sectors and to avoid duplication of effort. In addition, the SBAP utilizes DEC's technical staff to review technical fact sheets and articles for the SBAP's technical newsletter. SBAP regularly invites equipment vendors and representatives from companies that develop technologies to provide in-house technical workshops for staff. The SBAP always invites DEC's technical staff and other representatives of state agencies to these workshops so they might share the learning experience.	N/R

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
North Carolina	NC Air Quality Division and the Division of Pollution Prevention and Environmental Assistance have provided technical support and helped jointly to develop and hold workshops for specific business and industry. The Air, Water, and Hazardous regulatory programs and DPPEA have lent a senior permit writer to the SBO to staff EPIC, a multimedia permit information center.	Same as SBO.	Same as SBO.
North Dakota	No personnel from other departments have been assigned to assist the SBTCP. However, the SBDCs and the Governor's office have been asked to assist in providing small businesses with certain information provided by the SBTCP. Within the Department, the SBO makes direct requests for assistance of the Division Directors and their staff.	SBAP is organizationally inseparable from the air pollution control, water quality, and waste management programs.	CAP relies on information from SBO and SBAP to provide important feedback to the SBO and SBAP. Outside agency resources have not been leveraged by the CAP to date.

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Ohio	SBO is located within the OH Air Quality Development Authority, an independent state agency established to provide financing assistance to businesses investing in air quality facilities. In addition to the budget provided through Title V fees, SBO has received financial support from Authority resources. SBO cooperates closely with OEPA Division of Air Pollution Control in general and the SBAP in particular. This ensures provision of accurate technical information to businesses. SBO works with other state agencies, like the OH Department of Development, to coordinate programmatic delivery. SBO has assumed that the best access to small businesses, in many instances, is the various trade associations. SBO worked to expand its solid relationships with: Printing Industry of OH, OH Small Business Council/OH Chamber of Commerce, OH Bakers Association, OH Cleaners Association, OH Cast Metals Association, OH Chemical Council, National Federation of Independent Business (OH), Automobile Service Association of OH, OH Petroleum Marketers Association, OH Council of Retail Merchants. SBO recognizes that many small businesses do not belong to trade associations. At the end of 1997, SBO actively pursued cooperative relationships with: OH Bankers Association, OH Bar Association, and OH Society of Certified Public Accountants. SBO began an intensive education and outreach strategy to OH legislature. Individual meetings were held with staff members of each of OH's 132 state legislators. Each office received a Constituent Services Manual, which included general information about the Clean Air Act Amendments of 1990; specific information about the Clean Air Resources Center (OH's ombudsman program); and sample letters, press releases, and newspaper articles for the use of the elected representatives.	SBAP is located within the OEPA Division of Air Pollution Control headquarters, allowing direct access to permitting, inspection, enforcement, and policy development questions. This has helped to resolve many permitting issues. SBAP also joined several committees with the Air Pollution Division, which develop Agency permitting policies and coordinate MACT outreach and enforcement. SBAP has used OEPA's Public Interest Center to promote the SBAP through Agency newsletters and to develop fact sheet layout and graphics. SBAP uses 5 district offices and 10 local air agencies to help distribute SBAP literature and to refer companies to the SBAP. SBAP also has direct e-mail access to district office staff through a LAN network. SBAP visited these field offices in early 1997 and noticed an immediate increase in referrals to the SBAP as they became more familiar with our role and function. SBAP established mutual referrals with OSHA on-site consultation programs offered through the OH Bureau of Employment Services and OH Bureau of Workers Compensation to help businesses bridge the gap between OHSA and EPA concerns. OEPA established a pilot program for multimedia small business assistance, which covers a 10-county central OH district and is funded through a special appropriations bill. SBAP has coordinated several multimedia site visits with this program and regularly refers non-air questions to them. They, in turn, refer air questions to us. We have also partnered to create a multimedia brochure entitled, "A Simple Guide to Help You Prepare Your Company for an Ohio EPA Compliance Inspection." This program has also developed a newsletter, which the SBAP is a regular contributor for air articles. They have formed an advisory group modeled after the CAP and regularly attend CAP meetings. This initial two-year program received additional funding to operate in 1998, but future funding is uncertain at this time.	SBAP has supplied fact sheets and other compliance information to CAP members to distribute at their respective trade association meetings.

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Oklahoma	SBO and SBAP functions are a part of the Customer Assistance Program (CAP), which is a nonregulatory part of the Agency providing multimedia assistance and advocacy.		SBAP and SBO interact with the Panel on a regular basis. SBAP staff are very involved in identifying issues to bring before the Panel for their discussion and action.
Oregon	SBO is located in the director's office. As a member of the upper management team, the SBO has direct access to the director, department heads, and other regulatory agencies. He is the lead member of the agency's P2 Advisory Committee assigned the task of integrating and overseeing inter-program P2 activities. He also serves as a liaison to the CAP, SBAP, small business community, and general public on regulatory and P2 matters. SBO and P2 Advisory Committee have given the SBAP tentative approval to fund cross-media P2 workshops through the Small Business Development Centers.	SBAP staff serve on several agency committees. During this reporting period, SBAP headed up a special joint outreach project funded with EPA 105 grant money, which offered compliance assistance to small businesses engaged in chromium electroplating and anodizing, halogenated solvent cleaning, and ethylene oxide sterilization. SBAP and staff from 4 regional offices put together a strategy offering courtesy visits to any businesses subject to any of these NESHAPs. Invitational letters were sent to 583 businesses. Site visits were conducted out of the regional offices. SBAP is a member of a rulemaking committee assigned the task of drafting NESHAP area source regulations. This effort includes working with Waste Management and Cleanup staff to integrate hazardous waste and Title 3 regulatory requirements for dry cleaners. Effective January 1999, more than 400 OR dry cleaners will be required to submit comprehensive annual compliance reports. Air Quality and Hazardous Waste jointly will review submitted reports. SBAP, Lane Community College Small Business Development Center, and Lane Regional Air Pollution Authority jointly sponsored a 3-hour P2 workshop for small business owners. A variety of small businesses attended the workshop along with hazardous waste staff and representatives from local solid waste and sewage treatment agencies. SBAP published a 4-page guidance document about using P2, recycling, and reusing waste products for the SBDCs. SBDCs are using this document in some of its educational workshops. SBAP periodically performs joint compliance visits with hazardous waste technical assistance staff.	Special workshops are held as part of regularly scheduled meetings. Regulated businesses, vendors, trade groups, and service providers are invited. During this reporting period, CAP and Lane Community College Small Business Development Center worked together with SBAP and Lane Regional Air Pollution Authority in designing a 3-hour workshop. The CAO chair attended one of the workshop sessions. The CAP is a strong advocate of expanding outreach services and is working with the SBAP to utilize trade groups in the education process. Interest exists to initiate a small business Responsible Care program patterned after the Chemical Manufacturers Association national program. CAP and SBDCs are exploring the feasibility of financing environmental training in the community college system, eventually including such training in requisite core curricula.
Pennsylvania	SBO is funded by the Department of Environmental Protection (DEP) and housed within the Office of Pollution Prevention and Compliance Assistance (OPPCA). SBO is able to draw upon the expertise and staff of both DEP's and OPPCA's central office staff and the staff in the 6 regional offices across the state.	DEP has contracted many of the SBAP services to a private contractor. SBAP received cooperation from trade associations, utilities, and district libraries in delivering services.	DEP provides administrative and technical support to the committee. CAP meetings are held in the Department's building.

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Puerto Rico	N/R	Used Planning Division technical staff and Air Toxics staff for assistance.	EQB Special Projects Coordinator.
Rhode Island	SBO funded entirely from state revenues not associated with CAA program.	SBAP (2 FTEs) integrated into Department's existing P2 Program housed in the Office of Technical and Customer Assistance. 0.5 FTE (University of RI Research Associate) providing technical support to FTEs.	N/A
South Carolina	SBO provides multimedia assistance using resources in other program areas. Program is also involved in Environmental Network Partnership, which includes representatives from other providers, such as SBDC, Center for Waste Minimization, Center for Environmental Policy at University, MEP-sponsored programs, etc. Also involved in a new Environmental, Health & Safety Association, which includes OSHA representatives.	Program has regular access to technical staff in Bureau of Air Quality to assist on permitting issues. Air Quality also provides computer air dispersion modeling at no charge to eligible small businesses.	SBO serves as secretariat to CAP.
South Dakota	Ombudsman is supervised by the Secretary of the Department and has direct contact with the SBAP.	The individuals who work in the air program all contribute to the success of the SBAP.	CAP is made up of individuals from across SD. There is a good mixture of private individuals and small business owners.
Tennessee	SBO facilitates co-sponsorship for SBAP activities.	The program invites co-sponsors for regulatory compliance workshops. The co-sponsors include industry associations, local and state regulatory agencies, and other agencies that work with small businesses.	CAP is not operating. Appointments are in process. During the interim, trade associations are contacted for each industry group in which the program initiates activity.
Texas	*Small Business Advisory Committees (5 committees, 104 members) serve as a link between the* SBAP and the small businesses in their area. EnviroMentors (50+ volunteers statewide) provide free on-site environmental compliance assistance to small businesses. Work with trade associations to sponsor workshops and distribute literature to small businesses. Work with TX Manufacturing Assistance Centers (TMAC) to deliver on-site assistance to small businesses and to ensure that whatever service provider a small business contacts, they get the appropriate help. Work with Small Business Development Centers to develop videos, sponsor workshops, and conduct on-site visits for small businesses.		*Diverse membership from around the state* including contacts with several primary trade associations.

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Utah	SBO is facilitating the development of a Department-wide small business policy. As part of this, each Division has one designated small business contact. The group meets regularly as the Small Business Work Group (SBWG) to identify and begin to implement a good DEQ small business customer service policy and process that uses resources from all Divisions. The SBO also coordinates with the Department P2 work group to develop multimedia fact sheets and to review materials developed by the SBWG or the SBAP.	SBAP collaborates with the Department's P2 Program on P2 outreach projects and the development of a P2 training workshop for Division of Air Quality permit writers. SBAP has referred small businesses with waste disposal issues to the Division of Solid & Hazardous Waste (DSHW) Small Quantity Generator Program for assistance. If a small business expresses concern about contacting other Divisions for assistance, the SBAP has consulted with the appropriate Division and then relayed information to the business.	The Small Business Advisory Committee has received support from existing Division and Department resources. For example, the Department's consulting organizational facilitator has spent many hours working the Committee to establish working priorities and action plans. Additionally, the Executive Director's Office has provided clerical support to prepare agendas, minutes, and work plans.
Vermont	N/A	State funded 100% with assistance from VT Small Business Development Center and VT Manufacturers Extension Center	State funded 100%.
Virginia	Utilizes the experience and expertise of the SBAP Director, other DEQ staff, contacts within the SBDC Network, Manufacturing Technology Centers, our Office of P2, EPA, and trade/business organizations to maintain the pulse of the small business community vis-a-vis air regulatory issues and impacts. Routinely utilizes resources from regional and central offices when necessary.	SBAP Director also is responsible for the Agency's Air Toxics Program. Leveraging of 2 staff senior air toxics engineers for implementation of MACT provides approximately 0.3 FTE for utilization by the SBAP. Coordination and utilization of DEQ's P2 and Compliance & Enforcement Programs resources also compliment the SBAP activities. There also are assigned SBAP Liaisons (permit engineers in each of DEQ's regional offices, who function on an ad-hoc, as needed basis for outreach, compliance assistance, etc. Their activity is calculated at 0.2 FTE for this reporting period. Full day-to-day Regional Office activity with small businesses is still not being tracked on a consistent basis, but we are continuing to address the need to credit existing activity. Additional resources are often sought from EPA regional and national offices. Coordination and utilization of resources (people & material) from trade associations, the SBDC Network, manufacturing technology centers, manufacturing extension partnership, and business groups provide a base of outreach support.	The CAB (Compliance Advisory Board) has a wealth of expertise, ability and contacts from both public and private sectors, which can help to expand the reach and resources of the SBAP.
Virgin Islands	SBTAP Coordinator has been appointed to serve in a dual role as the SBS/SBTAP Coordinator without additional compensation.		Not yet named.

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Washington	SBO is agency representative to the Governor's Small Business Improvement Council composed of small business owners and various state agencies responsible for regulating the state's business. SBO is agency representative to Unified Business Identifier Board composed of state and federal regulatory agencies impacting small businesses.	SBAP supports: technical assistance staff for business-related pollution control/prevention on other Ecology program, outreach and assistance staff in the state's seven local air quality control agencies, and moderate risk waste staff in the state's 39 counties.	One CAP member is the legislative liaison for the Air Quality Program. All other CAP members are unpaid volunteers (per diem travel, lodging, and meals are reimbursed). Staff support is provided by SBAP.
West Virginia	SBO works closely with SBAP personnel to evaluate technical aspects of small business issues. DEP personnel outside the air office are available for consultation. Resources outside the agency are consulted on specialty projects, generally at no cost or exchanged for in-kind services.	SBAP works with other air quality staff, when necessary, to evaluate permit and Title V applicability for small businesses. A significant number of clients are referred to the SBAP through agency enforcement activities. Other DEP staff, especially P2 Services, are available to help coordinate assistance to small businesses. SBAP also is coordinating its efforts with other outside assistance groups, including university and Small Business Development Center efforts. Trade organizations and state OHSA contacts provide additional assistance.	All members serve on a volunteer basis.
Wisconsin	Numerous public and private sector experts are called upon on an as-needed basis to provide assistance to the SBO. Experts from the areas of development, finance, permit assistance, law, and environmental compliance/safety have provided suggestions and guidance.	Periodically, DNR personnel provide technical review of publications and partner in the development of seminars and workshops. These individuals review documents for completeness and accuracy, help formulate outreach strategy, and suggest work plans. SBAP members also provide guidance to and receive guidance from P2 and Solid & Hazardous Waste Education Center personnel on outreach and publications. SBAP staff consult with trade associations and other private and public sector professionals as appropriate.	Personnel from SBAP coordinate meeting locations, develop agenda topics, and organize the bi-monthly meetings of the CAP. Other individuals from the WI Department of Natural Resources, EPA Region 5, WI Department of Commerce, and University of WI Solid & Hazardous Waste Education Center advise the CAP on an as-needed basis.

N/A Not applicable N/R No response

TABLE E-11
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF COOPERATIVE EFFORTS		
	SBO	SBAP	CAP
Wyoming	On July 1, 1997, the Department established a new Office of Outreach and Environmental Assistance, which combined the SBO, SBAP, P2, and Emergency Response functions into one office. Together, we provide a coordinated information dissemination program on all Department activities spanning all environmental media. The office published a brochure this year and has distributed over 10,000 copies to small businesses throughout the state explaining how they can access information on environmental issues and get assistance if required in understanding and complying with those requirements.	Working in the new Office of Outreach and Environmental Assistance provides improved cross pollination of ideas between the various regulatory programs within the Department and among the various regulatory and compliance assistance functions. About 95% of the SBAP's time was on air quality issues and consequently charged to Title V fees. The Department maintains an excellent accounting system for the Title V expenditures. The SBAP and CAP functions and activities are published in the Department's newsletter and includes multimedia information from each Division in the Department. The newsletter is mailed to a broad cross section of businesses throughout the state.	The CAP has struggled this year with membership following the death of the former Chair, the extended absence of one member, and the resignation of another due to personal business schedule conflicts. In spite of these problems, one of the Panel's primary objectives was achieved, which was the formal approval of the state's Small Business Compliance Incentive Rule (multimedia) by the Environmental Quality Council. This new rule is a key feature of our new Outreach Office, because it provides an inventive for small businesses to contact us with questions about their environmental compliance status. In addition, the CAP believes that it can provide a forum to receive comments regarding proposed air quality regulations and policies that may affect small business. These comments can be furnished to EPA or the Environmental Quality Council (the state's environmental rulemaking body) as appropriate.

N/A Not applicable N/R No response

TABLE E-12
SUMMARY: SBAP MECHANISMS FOR AVOIDING DUPLICATION AMONG SBTCPs

Program	Communication/ networking with SBTCP & state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBAP/SBO personnel within EPA region	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of EPA documents/ contact with EPA	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources	Subscribe to SBO or govt. Ombudsman listserve	Other*
AL	X			X	X	X		
AK	X	X	X	X	X	X	X	X
AZ	X	X	X*			X	X	
Maricopa Cty	X	X	X	X	X	X		
AR	X			X	X			
CA	X	X	X	X	X	X		
Kerns Cty	N/A							
South Coast	X	X	X	X	X	X		X
CO	X	X	X			X	X	
CT	X	X	X	X	X	X	X	X
DE	X	X	X	X	X	X	X	
DC	X	X	X	X	X			
FL	X	X	X	X	X	X		
GA	X	X	X		X	X	X	
HI	N/R							
ID	X	X	X	X	X	X	X	X
IL	X	X		X	X	X		
IN	X	X		X	X	X		X

N/A Not applicable N/R No response

TABLE E-12
(Continued)

Program	Communication/ networking with SBTCP & state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBAP/SBO personnel within EPA region	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of EPA documents/ contact with EPA	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources	Subscribe to SBO or govt. Ombudsman listserve	Other*
IA	X	X	X	X	X	X	X	X
KS	X	X			X	X		
KY	X	X		X		X	X	X
Jeff. Cty	X							
LA	X	X		X	X	X	X	
ME	X	X	X	X	X	X	X	
MD	X	X		X	X	X		
MA	X	X	X	X	X	X	X	X
MI	X	X		X	X	X	X	
MN	X	X	X	X	X	X	X	X
MS	X	X	X		X	X		
MO	X	X	X	X	X	X		
MT	X	X	X	X	X	X	X	
NE	X	X	X	X	X		X	X
NV	X	X	X	X	X	X	X	X
NH	X	X	X	X	X	X	X	
NJ	X	X		X	X	X	X	
NM	X	X	X		X	X		
NY	X	X		X		X		

N/A Not applicable N/R No response

TABLE E-12
(Continued)

Program	Communication/ networking with SBTCP & state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBAP/SBO personnel within EPA region	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of EPA documents/ contact with EPA	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources	Subscribe to SBO or govt. Ombudsman listserve	Other*
NC	X	X	X	X	X	X	X	X
ND	X	X	X	X	X	X	X	X
OH	X	X	X	X	X	X		
OK	X	X	X	X	X	X		
OR	X	X	X	X	X	X	X	X
PA	X	X		X			X	
PR	X	X		X	X		X	
RI	X	X	X	X	X	X		
SC	X	X	X	X				
SD	X	X	X	X		X		
TN	X	X	X	X	X	X		
TX	X	X	X	X	X	X	X	
UT	X	X	X	X	X	X	X	
VT	X	X			X	X		X
VA	X	X	X	X	X	X	X	
VI	X	X	X	X	X	X	X	X
WA	X	X	X	X	X	X		
WV	X	X	X	X	X	X		
WI	X	X	X	X	X	X	X	

N/A Not applicable N/R No response

TABLE E-12
(Continued)

Program	Communication/ networking with SBTCP & state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBAP/SBO personnel within EPA region	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of EPA documents/ contact with EPA	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources	Subscribe to SBO or govt. Ombudsman listserve	Other*
WY	X	X	X	X	X	X	X	

Total numbers represent activities offered by state programs or one of the reporting counties/agencies in the state.

*Other

AK Work with Region X SBAPs and P2 programs. Participate in Federal Facility Roundtable in AK, Regional and National P2 Roundtable.

AZ P2 networks.

South Coast Subscribe to printing industry and pollution prevention listserve.

CT Development of coordinated network of environmental assistance providers.

ID By working through the Leadership Grant with WA, OR, and AK, the Region 10 states developed several fact sheets in cooperation with the Northwest Pollution Prevention Center.

IN CTAP staff person is a member of the Kentuckiana Ozone Prevention Coalition that serves the Louisville, KY and adjacent IN areas.

IA Active participation with other P2 programs.

KY Serving on Planning Committee for national SBO/SBAP Conference.

MA Wide-ranging business, industry, and government contacts.

MN Attendance at regional and national SBO/SBAP conferences.

NE Member of the National Steering Committee.

NC SBO is part of a Small Business Partnership Group that includes SBTDC, university, and other assistance providers. The purpose of this group is to coordinate activities and avoid duplication.

ND Subscribe to newsletters from several state SBTCPs.

OR MN P2 Wood Coating video as a training tool.

VT VT is a multimedia program.

N/A Not applicable N/R No response

TABLE E-13
SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS OF THE PAPERWORK REDUCTION ACT

Program	Routine review of SBTCP documents for compliance	Receiving / providing information electronically	Simplified / consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Concise easy-to-read summary documents	Other (See below)
AL	N/R						
AK	X	X	X		X	X	
AZ	X	X	X		X	X	
Maricopa	N/R						
AR	X	X				X	
CA		X	X			X	
Kerns	X	X	X	X	X		X
South Coast*		X	X	X	X	X	
CO	X	X	X		X	X	
CT	X	X	X	X	X	X	X
DE*							
DC			X			X	X
FL	N/R						
GA	X	X	X		X	X	
HI	N/R						
ID	X	X			X	X	
IL	N/A						

N/A Not applicable N/R No response

TABLE E-13
(Continued)

Program	Routine review of SBTCP documents for compliance	Receiving / providing information electronically	Simplified / consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Concise easy-to-read summary documents	Other (See below)
IN*		X	X	X	X	X	
IA	X	X	X			X	
KS	X						
KY	X	X	X	X	X	X	
Jefferson	N/R						
LA	X	X				X	
ME	X					X	
MD		X	X		X	X	
MA*		X	X	X	X	X	
MI	X	X	X			X	X
MN	X	X	X	X	X	X	X
MS	X			X		X	
MO	X	X			X	X	
MT		X	X			X	
NE	X		X	X	X	X	
NV	X	X	X	X	X	X	
NH	X	X	X	X	X	X	
NJ		X	X	X	X	X	

N/A Not applicable N/R No response

TABLE E-13
(Continued)

Program	Routine review of SBTCP documents for compliance	Receiving / providing information electronically	Simplified / consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Concise easy-to-read summary documents	Other (See below)
NM	X	X		X	X	X	
NY						X	
NC	X	X	X	X	X	X	
ND	X	X	X	X	X	X	
OH*	X	X				X	
OK	X	X	X	X	X	X	
OR	X	X	X	X	X	X	X
PA	X				X		
PR	N/R						
RI	X	X				X	
SC	X	X			X		
SD	X	X	X		X		
TN	X	X	X	X		X	
TX	X	X	X	X	X	X	
UT	X	X	X	X	X	X	
VT	N/R						
VA	X	X	X	X	X	X	X
VI	X	X	X		X	X	

N/A Not applicable N/R No response

TABLE E-13
(Continued)

Program	Routine review of SBTCP documents for compliance	Receiving / providing information electronically	Simplified / consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Concise easy-to-read summary documents	Other (See below)
WA	X						
WV	X	X			X	X	
WI	X	X	X	X	X	X	
WY		X				X	
TOTAL	37	38	30	20	30	41	6

*Other Actions and Notes:

Kerns Cty, CA — Routine review of information collection activities conducted by SBAP to ensure the information request is not duplicative or unnecessarily burdensome.

South Coast, CA — These actions were taken by small business assistance program without our local government and small business comimttee in place. These activities occurred on an agency-wide basis with staff and management from various sections of the SCAQMD initiating and participating. Some offorts were multi-agency. Resources of the SBAP alone would not have been sufficient to accomplish them.

CT — Development of compliance schedules.

DE — CAP was not in place in 1997, however Ombudsman was active in some of these areas.

DC — Electronic filing of permits.

IN — CTAP makes information available electronically, but avoids electronic communication, because we cannot guarantee confidentiality through this media. CTAP has worked with our Office of Air Management to encourage and assist with the development of simplified/consolidated permits and general permits for certain types of industries. CTAP regularly works with our Office of Air Management and Office of solid and Hazardous Waste Management to ease regulatory requirements where logical from a small business and environmental standpoint. CTAP regularly works with our Office of Air Management and Office of Solid and Hazardous Waste Management to review or develop concise, easy-to-read summary documents.

N/A Not applicable N/R No response

TABLE E-13
(Continued)

MA SBAP receives/provides electronic information. DEP has made significant advances in developing simplified/consolidated permits or forms and in eliminating unnecessary permits by increasing exemptions for insignificant actions. MA has chosen to eliminate permit requirements for small businesses that use industry-specific self-certification. This Environmental Results Program (ERP) will replace approximately 15,000 permits currently required of small businesses over the next 3-4 years. ERP is a program of MA/DEP; OTA has been closely involved in the development of this program and its outreach materials.

MI Mandated by state paperwork reduction and recycling legislation.

MN Attempting to reduce amount of monthly recordkeeping for some registration permit holders. Encouraged small businesses to comment on policy and rule development.

OH CAP members have reviewed the SBAP web page and will continue to evaluate ways to make information available electronically. CAP has discussed with SBAP means to identify additional small business activities warranting exemption from permitting as de minimis. 1998 will focus on effective ways to communicate such information to OH EPA permit/rulemaking staff. CAP will continue to evaluate documents produced by SBAP.\

OR Registration permits for perchloroethylene dry cleaners. Permit avoidance through P2.

VA Duplex printing.

TABLE E-14
SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS OF THE REGULATORY FLEXIBILITY ACT

Program	Routine review of SBTCP documents for compliance	Simplified or consolidated permits or forms	Eliminating unnecessary permits by increasing exemptions	Amnesty program	Review/comment on new air regulations	Other (See below)
AL	N/R					
AK	X	X			X	
AZ	X	X		X		
Maricopa				X		
AR	X			X		
CA					X	
Kerns	X					X
South Coast			X	X	X	
CO	X	X			X	
CT	X	X	X		X	
DE*						
DC	N/R					
FL	N/R					
GA	X	X			X	
HI	N/R					
ID	X			X	X	
IL	N/A					
IN		X	X	X	X	
IA	X	X		X	X	

N/A Not applicable N/R No response

TABLE E-14
(Continued)

Program	Routine review of SBTCP documents for compliance	Simplified or consolidated permits or forms	Eliminating unnecessary permits by increasing exemptions	Amnesty program	Review/comment on new air regulations	Other (See below)
KS	X				X	
KY	X	X	X		X	
Jeff Cty	N/R					
LA	X			X		
ME	X			X		
MD	X	X				
MA*	X	X	X	X	X	
MI	X	X				
MN	X	X	X	X	X	X
MS	X		X	X		
MO	X	X				
MT	X	X	X	X	X	
NE	X	X	X		X	
NV	X		X	X	X	
NH	X	X	X	X	X	
NJ		X	X		X	
NM			X	X	X	
NY	X		X	X	X	
NC	X	X	X		X	X

N/A Not applicable N/R No response

TABLE E-14
(Continued)

Program	Routine review of SBTCP documents for compliance	Simplified or consolidated permits or forms	Eliminating unnecessary permits by increasing exemptions	Amnesty program	Review/comment on new air regulations	Other (See below)
ND		X	X	X*	X	
OH*				X	X	
OK	X	X	X		X	
OR	X	X	X	X	X	
PA	X				X	
PR	N/R					
RI	X			X		
SC	X				X	
SD	X	X			X	
TN	X	X	X		X	
TX	X	X	X	X	X	
UT	X	X	X		X	
VT				X		
VA	X	X	X		X	
VI	X	X			X	
WA	X					
WV	X			X*		
WI	X	X	X		X	
WY				X		

N/A Not applicable N/R No response

TABLE E-14
(Continued)

*Other Actions and Notes:

Kerns Cty Ensure that small businesses are allowed to participate in rulemakings that have an effect on them. Ensure that all existing rules periodically are reviewed to determine their impact on small businesses and changed as necessary.

DE CAP was not in place in 1997, however the ombudsman was active in some of these areas.

MA DEP usually reviews regulatory information in SBAP documents. MA has eliminated permit requirements for small businesses that use industry-specific certification. This Environmental Results Program (ERP) will replace approximately 15,000 permits currently required of small businesses over the next 3-4 years. ERP has been closely involved in the development of this program and its outreach materials. Regarding amnesty programs, usually, when a new industrial sector is brought into ERP, there is a period of enforcement forbearance while companies come into line with the new program. Review and comment on new air regulations generally is done by OTA.

MN Encouraged small businesses to comment on policy and rule development.

NC Self-confessor policy.

ND Not formal, but unwritten amnesty policy.

OH CAP has discussed with SBAP means to identify additional small business activities warranting exemption from permitting as de minimis. 1998 will focus on effective ways to communicate such information to OH EPA permit/rulemaking staff. CAP and SBAP have discussed formalizing review of new regulations and providing public record comment on small business impacts. Also focus on ensuring small business awareness of new regulations and impact.

WV In the amnesty program, SBAP independent from enforcement.

TABLE E-15
SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS OF THE EQUAL ACCESS TO JUSTICE ACT

Program	Routine review of SBTCP documents for compliance	Pro bono legal services	Funding/technical assistance for groups aggrieved by regulatory agency actions	Other (See below)
AL	N/R			
AK	X			
AZ	N/R			
Maricopa	N/R			
AR	X		X	
CA			X	
Kerns Cty	X			
South Coast			X	
CO	X			
CT	X			
DE*				
DC	N/R			
FL	N/R			
GA	X		X	
HI	N/R			
ID	X			
IL	N/A			
IN	N/R			

N/A Not applicable N/R No response

TABLE E-15
(Continued)

Program	Routine review of SBTCP documents for compliance	Pro bono legal services	Funding/technical assistance for groups aggrieved by regulatory agency actions	Other (See below)
IA			X	
KS	X			
KY	X			
Jeff Cty	N/R			
LA	X		X	
ME	X			
MD	N/R			
MA*			X	
MI	X			
MN	X			
MS	X		X	
MO	X		X	
MT	X			
NE	X			
NV	X		X	
NH	X			
NJ	N/R			
NM			X	
NY	X			

N/A Not applicable N/R No response

TABLE E-15
(Continued)

Program	Routine review of SBTCP documents for compliance	Pro bono legal services	Funding/technical assistance for groups aggrieved by regulatory agency actions	Other (See below)
NC	X			
ND				X
OH*			X	
OK	X		X	
OR	X		X	X
PA	X			
PR	N/R			
RI	X			
SC	X			
SD	X			
TN	X		X	
TX	X	X	X	
UT	X			
VT	N/R			
VA	X			
VI	X		X	
WA	X			
WV	X		X*	
WI	X			X

N/A Not applicable N/R No response

TABLE E-15
(Continued)

Program	Routine review of SBTCP documents for compliance	Pro bono legal services	Funding/technical assistance for groups aggrieved by regulatory agency actions	Other (See below)
WY	N/R			

*Other Actions and Notes:

DE CAP was not in place in 1997, however the ombudsman was active in some of these areas.

MA OTA has agreed to provide training/technical assistance to local environmental or environmental justice groups to help them participate more effectively.

ND Department media programs, including the SBAP, are aware of Equal Access to Justice issues and environmental justice laws. The Department is unaware of any justice issues.

OH CAP has evaluated availability of technical assistance to any group qualifying for assistance.

OR Korean translation of perchloroethylene dry cleaning reporting forms and informational brochures. Minority business representation on CAP.

WV Assistance for groups aggrieved by regulatory actions via help from ombudsman.

WI Provide information on the Act to interested parties.

APPENDIX F

PROGRAM EFFECTIVENESS

TABLE F-1
COMMENTS RECEIVED ON THE SBTCP

PROGRAM	COMMENT RECEIVED
Alabama	N/R
Alaska	Positive comments (typical response and from multiple people): Needs were met courteously and responsively. Glad the government is finally helping out the little guy. Thanks for explaining things clearly. Negative comments (few people and relates to mailing of dry cleaning video to all dry cleaners): Waste of government money and time.
Arizona	All of our customers have been ecstatic with our service. It is surprising to me that people have a very low expectation for how much help a state agency will provide them on an issue. When we deliver our service, they are very pleased and surprised! The only negative we receive is that we do not offer financial assistance for businesses at this time.
Maricopa Cty	N/R
Arkansas	"Would like more education explaining regulations." "Department needs to assist and offer help, not just regulate and inspect."
California	Sample comment: I wish to thank you [ARB] for your diligence in my request. It has been a long time since I received such service from a government employee. It seems so often that many (be they local, state, or federal) plain don't know, don't care and "isn't my job." It's encouraging to find one who, 1) wishes to help, 2) does help, and 3) does in a professional manner. Many thanks.
Kerns Cty	N/R

N/A Not applicable N/R No response

TABLE F-1
(Continued)

PROGRAM	COMMENT RECEIVED
South Coast	Businesses like the improvement in service. Multilingual staff is a great asset. Economic development efforts have been appreciated. Our efforts to coordinate P2 solutions with water agencies have been appreciated. High level of support for our on-site technical consultations where permit applications are completed (with fees calculated). Suggestions for improving our service: "Do more to make businesses aware of program." "Advocate more business-friendly approaches in the agency -- don't rely on business to do it alone."
Colorado	Helped a large number of individual business owners to get into compliance. Helped clarify regulatory requirements. Down to earth staff. Good to have someone in a nonthreatening position to consult with. No negative comments except that some business owners think our program should hire more staff so we can expand our services.
Connecticut	SBAP has two major outreach initiatives during 1997: Fundamental Assistance for Small Title V Sources (FASTVs) and an initiative for autobody shops. In general, the programs have been very well received . A review of evaluations received from workshops conducted during 1997 indicated that the average rating received was an 8.5 on a scale of 1-10 with 10 being the highest.
Delaware	"Nice to have someone looking out for small business interests." "Great to know who to call for assistance." "Ombudsman cannot be truly objective, because he is employed by the state." "At least we know where to start to get answers to our questions."
District of Columbia	N/R
Florida	N/A
Georgia	"I am so glad that you all exist." "It's about time that the Division had a program like this one." "Of the dry cleaners that we (EPD) inspected, only the ones that Phillip (SBAP) assisted were in compliance." "...Do the right thing without criticism." "Allow those over 100 employees to use your services. Your assistance has allowed us to grow and soon (1-5 years) we will likely be over 100 employees."
Hawaii	N/R
Idaho	None
Illinois	There has never been a direct complaint of lack of service or assistance to my office regarding the SBAP. The program seems to be functioning just fine. Since its inception, the SBAP has enhanced the position of small businesses in IL.
Indiana	Customers are appreciative of our assistance as well as our confidentiality policy. Vehicle Maintenance Manual not completed when promised.
Iowa	SBAP assistance is limited to businesses with fewer than 100 employees. As SBO, I have received complimentary reports from users of SBAP services and from other states.

N/A Not applicable N/R No response

TABLE F-1
(Continued)

PROGRAM	COMMENT RECEIVED
Kansas	We receive many repeat calls. Most of those who contact us express thanks for our program. We also receive many positive comments about the SBEAP newsletter, the KS AIRLines. Evaluations from workshops and meetings indicate overwhelming appreciation for the program in general.
Kentucky	The AQRSB conducted a survey of clients assisted over the phone in 1996 during the first quarter of 1997. The results were favorable. Using a ranking system from 1 to 4 with 1 denoting poor service and 4 representing excellent service, the results were: Responsiveness - 3.5, Courteousness - 3.8, Timeliness - 3.4, Recommend to Others - 3.6, Overall Performance - 3.5. The AQRSB interviewed 3 small businesses assisted by the KBEAP whose comments about the Program were very positive. Copies of the final publication will be provided to EPA when available.
Jefferson Cty	N/R
Louisiana	"If all of your assistants perform as Mr. Mayeux, your program must be a very valuable asset to small businesses such as ours. Keep up the good work!" "Leah guided me through every step of way. She was very valuable to me in producing our permit limits as well as completing the application forms." "Need to have representatives check all companies periodically. In our field of work - sandblasting and painting - there are several companies in our area (some within one square mile of our facilities) that are not in compliance with the DEQ regulations. It is costly to keep improving our facilities to continue staying within DEQ regulations, which makes it very hard to compete with these companies."
Maine	"Extremely helpful for a potential startup business." "Everyone has been very helpful." "Outstanding service by the tech staff and P2 team!"
Maryland	N/A
Massachusetts	We have received comments from some SBAP clients that we have taken too long in sending documents to them. Also, some businesses expected that the SBAP could act as an advocate when they felt the DEP was penalizing them unfairly. Informally, we have been able to assist in a few cases, but without official standing, we have no authority to intervene in enforcement actions.

N/A Not applicable N/R No response

TABLE F-1
(Continued)

PROGRAM	COMMENT RECEIVED
Michigan	SBO: No specific comments, but overall feedback on the services provided by the SBO has been positive. SBAP Education and Outreach: The SBAP held 4 educational events during the 1996-97 fiscal year. 3 Permit to Install (New Source Review) permit applicability workshops were structured to address the various levels of permitting expertise in the business community. A group of fabricare workshops, offered at 8 locations statewide, introduced dry cleaners to the new comprehensive environmental and regulatory guide for their industry. Evaluation forms were completed by participants at each event with most participants rating the event as "good" or "excellent." The SBAP recently began including a survey form with each guidance publication distributed to the program's customers. The self-mailer survey encourages our customers to provide comment on how helpful a publication was, or future changes they would like to see with the publication. This is just another measurement tool by which the SBAP program can better evaluate its technical assistance activities. SBAP On-site Technical Assistance: SBAP also received 4 appraisal letters from customers complementing the effort and quality of the personalized outreach assistance provided.
Minnesota	In monthly surveys mailed to randomly selected SBTCP customers, 50 of 52 respondents answered,"yes," to the following questions: "Did the Small Business Compliance Staff answer your question?" "Was the question answered in a timely manner?" Was the staff person knowledgeable and courteous?" "Would you use our services again or recommend us to others?" Additional survey comments: "I thank you - very kindly and personal - has been very courteous and helpful." "I was able to use your information to pass on to employees to cut back and do not waste product!" "Miss Phyllis Strong was most helpful in completing our application. We couldn't have done it without her." "I needed help with info on MSDS. I called quite a few times and each time Barb Loida went out of her way to help me."
Mississippi	N/R
Missouri	We have received several positive comments about the assistance we have provided. We have not received any negative comments.
Montana	MT DEQ's Enforcement Division complimented the SBO/SBAP's ability to effectively help small businesses achieve compliance without resorting to enforcement actions. U.S. EPA's MT office complimented the SBO/SBAP for its work in the 1997 Sector Initiatives. SBAP still is not trusted by many small businesses and communities. One MT community group has refused to let the SBAP participate with MT's Pollution Prevention Program in a series of environmental compliance and P2 site visits for fear of enforcement action when the group was offered an amnesty guarantee.
Nebraska	We are getting our name passed around within business meetings and professional groups. This has caused an increase of incoming calls requesting site visits. This year, our site visits increased to 70, an increase of 60% over the 42 site visits in 1996. New start-up businesses have enjoyed the assistance at the front end, rather than getting started and then wondering if they are in compliance.

N/A Not applicable N/R No response

TABLE F-1
(Continued)

PROGRAM	COMMENT RECEIVED
Nevada	SBAP has received comments from various businesses regarding assistance and how they have searched everywhere for particular information and SBAP staff have been able to provide the information. Comments included appreciation for a "1-stop shop" for information, for the ability to provide multimedia information from one office, for an authoritative source of environmental regulatory information, for a source of assistance that is not going to refer them to yet another contact (they are not "shuffled around"), and for prompt service. Businesses have expressed appreciation for assistance from staff with direct access to the environmental regulatory agency. Coordination with other regulatory agencies and business assistance agencies provides an atmosphere to treat a business as a unit, which simplifies the permitting process. Comments from businesses in both Clark and Washoe Counties have been that staff with these agencies are very helpful in complying with CAA requirements, including assistance in completing permit applications, advice on P2, and explaining the Act and the local Air Quality Program. Businesses within the state and those looking to locate new businesses in NV have commented that the State Air Quality Program staff is very easy to work with and helpful in complying with environmental regulations. DEP needs to have a web site or direct link from the NV home page so that inquiries can be made easily via the Internet. It is time consuming and cumbersome to wait for and receive paper copies of needed documents. BEP has received many positive comments about current services when they distributed a survey regarding their program. BEP reported that clients would like to see an expansion of assistance services offered to include OSHA and Fire Marshall regulations.
New Hampshire	NH program continues to receive very positive comments concerning the scope of services offered and the level at which problems are researched and resolved. Many business owners have commented that the program is able to explain regulatory responsibilities in understandable language easily accepted by industry. Business owners have commented positively on the basic premise that environmental compliance can increase economic health of companies through the practical application of common sense source reduction efforts and more efficient use of raw materials. A number of business owners have commented positively on the peace of mind generated through the use of the EPA Compliance Incentive Policy and the intention to adopt a NH version of this policy.
New Jersey	N/R
New Mexico	SBAP created a customer survey, and positive comments include: "You're doing an excellent job. Please, keep up the good work." "Your staff is very polite and helpful." A negative response was received: "Make the Dry Cleaner Self-Audit Checklist easier to read (specifically question 7)."

N/A Not applicable N/R No response

TABLE F-1
(Continued)

PROGRAM	COMMENT RECEIVED
New York	"I would like to take the opportunity to express my gratitude to [the SBAP] for your great helpfulness and cooperation in simplifying and expediting [the permitting] process." (Letter to SBAP from owner of a NYC manufacturing company.) "On behalf of the MAMF and AESF associations and myself, we would like to take this opportunity to thank you for your excellent presentation on the Part 201 Regulation of Air Contamination Resources. It was apparent from the participation of the audience that you were definitely addressing concerns of our members." (Letter to SBO from Executive Director of the Masters' Association of Metal Finishers.)
North Carolina	"Thank you for participating in the meeting with regulatory staff. You helped us obtain a constructive course of action. That's what we needed." (Small specialty equipment manufacturer.) "We can always count on you to go the extra mile for our small businesses. Thank you for the good job you are doing." (Representative of National Federation of Independent Businesses.) "I really appreciate your help. We were totally confused by the compliance reports of the new air quality requirements. Your visit and the information you provided explained what we had to do and to meet the requirements." (A small plating shop.)
North Dakota	None received.
Ohio	Comments received by the SBO about the technical assistance program have been consistently positive. In fact, the SBO has not had to act to resolve any disputes between a company and the SBAP. It is a measure of success that the SBAP is viewed by many as a source to help resolve problems with other sections of the regulatory structure. Naturally, some of the positive comments have a strong hint of back handed compliment to them. Most frequent is the expressed frustration that such a program has not been around longer or is not more of a visible agency priority. Many businesses have expressed relief that they now have a source for consistently reliable information and without charge.
Oklahoma	The SBAP in OK has continued to be dedicated to providing quality regulatory and technical assistance to the business and industry of OK. This past year, we have continued to be active as speakers, assistance providers over the phone, and visitors to facilities to provide direct hands-on assistance. The SBAP has been particularly active in playing the role of advocate. The SBAP was involved in a major revision to the permitting rules resulting in simplification, broader exemptions, and the creation of general permits and permits by rule. We believe these actions will be extremely beneficial to the small business community in this state.

N/A Not applicable N/R No response

TABLE F-1
(Continued)

PROGRAM	COMMENT RECEIVED
Oregon	No negative comments were received by the SBO or CAP during this reporting period. In general, feedback received from small business owners, vendors, citizens, and other stakeholders was very positive. The SBAP experienced an increased demand for technical assistance services. Many were repeat customers, which would indicate that there exists a heightened awareness and trust. SBAP staff were asked to participate in several training seminars outside the agency, again suggesting an increased level of trust. Verbal comments of appreciation were received from 2 wood coating businesses, a small chrome plater, and a small grain elevator operator, who, with SBAP's assistance, were allowed to remit permit payments on an installment plan. The OR chapter of National Federation of Independent Businesses (NFIB) submitted a letter to EPA supporting a green sticker grant proposal. Letters of appreciation were received from a small wood coater, the Lane Community College for assisting with a painting and finishing seminar, and Lane Community College SBDC for co-sponsoring small business P2 workshop.
Pennsylvania	N/R
Puerto Rico	N/R
Rhode Island	N/R
South Carolina	Comments have been positive.
South Dakota	Contacts with the SBO have generally been positive and in the form of requests for information or points of contact within regulatory programs. Often these contacts involve air sources with questions outside the air program. Contacts to the SBO regarding assistance from the SBAP have been very favorable.
Tennessee	"You're doing a good job." "Keep up the good work." "Thanks for your help."

N/A Not applicable N/R No response

TABLE F-1
(Continued)

PROGRAM	COMMENT RECEIVED
Texas	Each quarter, the SBAP sends Customer Service Surveys to everyone who has called during the quarter. These comments are taken verbatim from the Customer Service Surveys. - Super service. I wish our state demonstrated the same level of commitment as Texas. (Comment from AZ.) - Although the person who I initially talked to was not knowledgeable in my problem area, he was extremely helpful in getting enough information from me to have the right person call me back and he sent me the info I needed. - Good job! - Your regulations are not written in easy to use language. - Convince other TNRCC divisions that a cooperative approach with the regulated community is the key to long term improvements. - Wish all government agencies were this good! - Some information is too institutionalized and the eyes tend to glaze over while trying to understand terminologies. Please try to make the literature understandable by those without a higher education. - Very helpful on the phone! - The information I received was from rules and regulations on incinerating waste (office waste) and was hard to understand. - I couldn't be happier with the help provided me. It really simplified my life and saved me lots of $$$. - More information specifically regarding the dry cleaning industry. - Good service from your office, but still there was some conflicting information from city, state, and industry sources -- it is hard to know everything. - Your organization is very large. I feel that more individualized service, when applicable, would help effectiveness. Good job! - Keep up the good work! Thanks for trying to keep our environment clean and safe for future generations to enjoy. - The representative I spoke with was extremely helpful and patient with my numerous questions. - Overall, very helpful. - All of the contacts I have had with TNRCC persons have been excellent. The people more than go out of their way to ensure that I have the correct department and information. I could not have asked for a better surprise than the cooperation I have received from this state agency. - I am impressed with the attitude and expertise of the people I have talked with. - It was great to have someone who is knowledgeable about the subject matter.
Utah	Comments received by the SBO include: "Time required to obtain an air permit is too long." "Businesses just want to know what they need to do." "Regulations are a great burden to small businesses."
Vermont	None was received by the CAP.
Virginia	We continue to receive positive comments on the usefulness and the ability of businesses to access non-regulatory technical assistance that is willing to listen and understand the regulatory difficulties of the sources.
Virgin Islands	N/A

TABLE F-1
(Continued)

PROGRAM	COMMENT RECEIVED
Washington	Because our staff has collectively become more aware of the agency's commitment to better serve small businesses, positive comments continue to increase. This is particularly true with those industries in which we placed our greatest focus in 1997 -- gas stations, fiberglass and spray coating operations, and dry cleaners.
West Virginia	Sample comments from evaluations submitted by dry cleaners include the following: - SBAP made it [complying the NESHAP] a lot easier. - Staff was very helpful and non-threatening. - The inspector [SBAP auditor] was very prompt and informative...[follow up] was impressive to me. - SBAP was a significant help to us. WV program is excellent, in my opinion and the staff is very helpful and totally professional. - Your staff is very knowledgeable on the dry cleaning industry. - Thanks for your timely help! - Thanks for your help. Steve [SBAP auditor] did an excellent job. Without exception, the comments concerning the SBAP received by the SBO have been positive. Comments like: "Thanks for the help, it was a business saver." "Great service, where have y'all been?" "Your support gave me the confidence to continue the fight."
Wisconsin	N/R
Wyoming	Numerous positive comments have been received on the new Office of Outreach and Environmental Assistance. A number of businesses have contacted the Office and requested on-site visits, several businesses have taken action to use the new Compliance Incentive Rule, and other businesses have requested assistance with permitting procedures.

N/A Not applicable N/R No response

TABLE F-2
CONCERNS/INQUIRIES RECEIVED BY THE PROGRAMS AND INFORMATION OF THEIR RESOLUTION

PROGRAM	CONCERN/INQUIRY	RESOLUTION
Alabama	N/R	
Alaska	Asphalt plant owners were upset about a proposed general permit that was being proposed for them.	Help arrange and run a public workshop between asphalt plant owners and the air program to work out differences. Overall, was a very successful meeting.
	Development and issuance of general permits was going slow.	SBAP agreed to write the dry cleaners general permit. Also agreed to help issue general permits once EPA buys off on them.
	Had specific problems with the general permit for diesel electric facilities that would affect majority of rural electric power suppliers.	Worked with the CAP to educate and have rural electric generating plant owners express their concerns. The CAP made recommendations directly to the Air Program as to what they believed should be in a general permit. A compromise was reached that was agreeable to all concerned.
Arizona	Many complaints are due to the lengthy amount of time to get permits processed or replies from the Department.	SBO/SBAP discuss issues with program staff to find out cause for delay, ask if we can help, and in some cases even suggest process improvements for getting paperwork processed more efficiently.
	Timelines for permit application approval too long.	Continuing to develop General Permits and currently participating in committee to develop license timeframes for implementation in 1998.
	Inconsistency between inspector and permit engineers in interpreting rules.	Help draw issues to the attention of managers and lead process to developing a consistent approach for handling issues. Develop an open line of communication between the two organizations.
Maricopa Cty	N/R	
Arkansas	Permitting car washes.	Ombudsman offered assistance with part time staff writing storm water P2 plans.
California	N/R	
Kerns Cty	N/R	

N/A Not applicable N/R No response

TABLE F-2
(Continued)

PROGRAM	CONCERN/INQUIRY	RESOLUTION
South Coast	Fees for annual renewal and applications.	Work with Fee Review Committee to assist companies.
	Financing.	Provide financing alternative sources.
	Application processing time too long.	Work with engineer to expedite processing.
	Chrome platers -- BACT issues too stringent and prescriptive.	Working with engineers and equipment manufacturers to resolve.
	Rule compliance.	Research done to establish need for corrective rule amendments.
	Variance petition assistance.	Assisted with paperwork completion and emission calculations.
	Expired operating permits.	Amnesty Program implemented.
	Awareness of rule/compliance expectations.	Rule-specific workshops held.
Colorado	(No data was obtained from dissolved SBO in 1997. The SBO will provide input for the 1998 report.)	
Connecticut	Meeting notices are sent late and do not provide sufficient notice.	An electronic mailing list has been developed to notify members of monthly advisory committee meetings.
	Request for additional staff/resources allocated to technical assistance.	This is difficult to address, since it appears that demand will almost always exceed available resources, particularly during lean fiscal times.
	Provide information on activities early in the rule making process and on a consistent basis.	Changes are underway with both the Air Bureau's Clean Air Act Advisory Committee and the CAP to address this request.
Delaware	Permit applications are too complex and confusing.	Looking at ways to simplify applications and making certain information available electronically.
	Takes too long to get a permit.	Extra staff is helping to eliminate backlog of permit applications.
District of Columbia	N/R	
Florida	N/A	

N/A Not applicable N/R No response

TABLE F-2
(Continued)

PROGRAM	CONCERN/INQUIRY	RESOLUTION
Georgia	SBAP received a request from the Savannah regional office to ensure that they were treating a small business owner fairly and that all options had been considered because of pending enforcement actions. The small business in question had a pile of scrap veneer on his property. According to the regional office, the scrap pile had been there more than 30 years. The business owner purchased the business in January 1996 and inherited the problem.	SBAP resolved the problem by getting all parties to allow the small business owner to dispose of the current pile by using an air curtain destructor. The business owner was given 30 days to correct the problems. All parties agreed to this solution.
Hawaii	N/R	
Idaho	None	
Illinois	N/R	
Indiana	Information given to a customer differed from that given by another CTAP staff person.	CTAP worked with the regulatory branch to determine the correct answer to the caller's questions. The result was that the regulatory branch had changed its guidance without properly informing CTAP. CTAP quickly returned calls to customers who had previously called with the same question and took steps to better communicate with this regulatory branch.
	Land development companies do not trust our confidentiality policy as it relates to wetlands and endangered species.	Working to develop a relationship and a proven track record with these companies.
Iowa	Small businesses are unaware of the regulations that affect their businesses. Regulations are cumbersome to understand.	SBO and the regulatory agency are combining efforts to construct a database to include small businesses affected by CAAA and to distribute "plain English" information to small businesses via the new database system.
Kansas	Complaint involved lack of info on part of the business after inspector's visit. Referred to SBAP for assistance.	Outcome is pending.
	Lack of funding to comply with regulations.	Referred to SBA for loan guarantee. Informed business of training grants through economic development department.
Kentucky	AQRSB indicated to DAQ a greater need for publication development by KBEAP.	KBEAP drafted a summary of KY air quality regulations with which all businesses must comply.
	DAQ expressed dissatisfaction with the level of detail provided in FY97 Annual Report.	KBEAP prepared an appendix to the initial Annual Report with more detail on activities.
	KBEAP expressed concern to AQRSB and SBSSAP that certain data requirements of the EPA Annual Report jeopardized client confidentiality.	AQRSB discussed concerns with EPA contractor, who provided an alternative to the initial reporting requirements.

N/A Not applicable N/R No response

TABLE F-2
(Continued)

PROGRAM	CONCERN/INQUIRY	RESOLUTION
Jefferson Cty	N/R	
Louisiana	None	
Maine	Concerns raised during rulemaking for stormwater regulations. Business community voiced concerns that regulation may hurt small business.	SBTAP/SBO developed financial guidance for small business and clarified our role as compliance assistance providers.
Maryland	N/A	
Massachusetts	Sometimes takes too long to send requested documents to small business clients.	Established a tracking mechanism to catalog incoming requests for information or technical assistance. Lists client information, necessary documents, when sent. Also lists technical assistance issues, to which OTA team is was referred, and resolution.
Michigan	Enforcement intercession.	Mediate between businesses and agency.
	Permit status inquiries.	Ask regulatory department staff.
	Permit application assistance.	Work with businesses and the state permit issuing department staff.
	Brownfield redevelopment inquiries.	Provide state department contacts and follow-up on department commitments.
	Difficulties with local regulatory district offices.	Mediate between regulatory department district staff and businesses.
Minnesota	A soil roaster contested the air emission factors used to calculate his air emission fees. The same business owner also has made complaints about operating permit requirements and the lack of a "level playing field" within the soil remediation industry (i.e., soil roasting versus composting, land-spreading and/or landfilling).	SBO is working with staff of the air emissions inventory unit and the compliance and determination unit to arrive at a supportable emission factor. A workgroup has been established and is meeting to address issues with the current operating permits for soil roasters. One of the workgroup goals is the development of a general permit. This workgroup also is looking at broader issues within the soil remediation industry.
	Registration permit holders continue to complain that the monthly recordkeeping and calculation requirements are overly burdensome to their businesses in addition to being environmentally meaningless.	SBO and SBAP staff are working with rulemakers to explore solutions that might possibly include replacing monthly recordkeeping with annual reporting.
Mississippi	N/A	

N/A Not applicable N/R No response

TABLE F-2
(Continued)

PROGRAM	CONCERN/INQUIRY	RESOLUTION
Missouri	N/R	
Montana	N/R	
Nebraska	County was not allowing a business to use wood chips that were created from an old building.	Worked with the county to set up guidelines that would allow the old buildings to be chipped and used as fill or road dressing. Nails had to be removed, and no treated wood, electrical or other materials that should be landfilled would be allowed.
	Consultant complained that the AP 42 factors were not as low as they should be and felt that an enclosed auger should have 0% emission.	Worked with the Air Program to settle the dispute, including Title 129 and the CAA. The consultant needs to prove the point by one of three methods. The consultant does not want to provide a demonstration by math or complete testing. AP 42 will stand until other information is provided.
Nevada	Current federal regulations and policies for implementation of the CAA are not understood by sand & gravel industry. Language is bureaucratic and time-consuming to read.	NDEP Bureau of Air Quality initiated dust workshops throughout the state to inform and assist contractors.
	Annual inventory form is difficult to understand and to complete.	NDEP Bureau of Air Quality staff reassessed the form and made changes where possible. Changes in software used to generate the forms are being evaluated.
New Hampshire	Poorly written regulations.	Provide plain language interpretations on a case by case basis.
	Too many environmental regulations to comply with.	Provide industry and business specific regulatory applicability determinations.
	Inconsistent application of enforcement actions.	Work with enforcement personnel in appropriate actions.
New Jersey	None	
New Mexico	N/A	
New York	N/R	
North Carolina	Clean-up issue. Consultant cost, lack of knowledge about regulations and alternatives.	Advised client of alternatives and suggested contacting a different consultant to compare cost.
	Civil penalty to small business because of unpermitted equipment.	Advised to submit application and negotiate a reduction in the penalty.
	Consultant not advising client of easy solution to permit issue.	Set up meeting between client with consultant and regulators to discuss alternatives and simple solution.

N/A Not applicable N/R No response

TABLE F-2
(Continued)

PROGRAM	CONCERN/INQUIRY	RESOLUTION
North Dakota	None	
Ohio	Complaints have centered on inability to understand regulatory language, ranging from confusion about whether or not a business is covered to inability to complete permit applications.	Businesses have been referred to the technical assistance unit and complaints have been resolved through provision of the types of assistance detailed in this report.
Oklahoma	None	
Oregon	No complaints were received by SBO, CAP or SBAO during 1997.	No action necessary.
Pennsylvania	N/R	
Puerto Rico	N/R	
Rhode Island	N/R	
South Carolina	Cost of Professional Engineer seal on permit application continues to be a complaint.	
South Dakota	Who should I talk to about this issue or concern?	Direct party to the appropriate DENR staff person, usually in the SBAP.
	Do you have some information on this subject?	Provide information to party and direct party to SBAP staff or other DENR staff for additional information.
	What permits do I need for my business?	Provide party with DENR permitting guide and direct them to appropriate DENR staff. The permitting guide is available on DENR's home page.
Tennessee	None	

N/A Not applicable N/R No response

TABLE F-2
(Continued)

PROGRAM	CONCERN/INQUIRY	RESOLUTION
Texas	TNRCC assessed a company a hazardous waste generator fee of $5,716. The company's Health and Safety Coordinator thought the fee assessment was wrong, because most of it was for wastewater, which is fee exempt. After writing a letter to the TNRCC requesting a fee waiver and being denied, the company called the SBAP.	SBAP staffer realized the agency was quoting the rules when the only problem was a clerical error in the codes used to identify the wastewater. The TNRCC corrected the error and lowered the fee from $5,716 to the correct amount of $100.
	Small businesses are confused by the many recordkeeping requirements that apply to them under federal and state laws for waste.	SBAP developed a RCRA Waste Recordkeeping Kit to summarize the state and federal requirements and explain reporting and recordkeeping in plain language. The kit includes a border section for maquiladoras. The SBAP held 23 workshops around the state and reached over 600 businesses. As a result of the workshop, businesses ordered over 450 waste-related forms from TNRCC.
	Many foundries have large volumes of waste sand and a potential for air emissions that need to be addressed. The applicable standard exemption contains typographical errors and is outdated.	SBAP staff was able to get the TX Department of Transportation to publicly announce that foundry sand could be used in its projects and had them outline testing methods to do so. Instigated the revision of Standard Exemption 58.
	Wood products manufacturers have new rules regulating their air emission that resulted in increased enforcement efforts beginning 9/1/97.	SBAP identified an additional 500 businesses in this industry. Developed a one-page standard exemption for this industry that TNRCC adopted.
	Dry cleaners in Corpus Christi received Notices of Violations from EPA for RCRA-related violations.	SBAP staff determined EPA gave most of the NOVs in error, because the businesses were CESQGs and not subject to RCRA requirements. SBAP sent a letter to EPA to clarify the situation.
	Decorative chrome platers were operating without air authorization. They could not meet Standard Exemption 118 because of distance limitations.	Working together, New Source Review and the SBAP developed a new standard exemption that will save chrome platers in TX approximately $600,000 to $900,000.
	The City of Austin was considering adopting an ordinance to regulate autobody shops, which was inconsistent with TNRCC rules.	SBAP outlined the inconsistencies between the ordinance and state and federal rules. City staff chose not to pursue passage of the ordinance.
Utah	Time required to obtain permit.	Developing pilot projects that try to address the complaints.
	Businesses just want to know what they need to do.	Asking businesses for their comments on the pilot projects.
	Regulations are a great burden to small businesses.	DEQ is working on a small business policy that promotes good customer service across all regulatory programs.
Vermont	N/R	

N/A Not applicable N/R No response

TABLE F-2
(Continued)

PROGRAM	CONCERN/INQUIRY	RESOLUTION
Virginia	Do not understand the regulations.	Assist with understanding of the regulations and permitting.
	How can we pay for regulatory emissions controls?	Helped to foster the creation of a revolving loan fund for CAA compliance.
	Compliance Advisory Board began deliberations and review of the effect of enforcement activities on small businesses.	Recommendations for agency actions will be made in 1998.
Virgin Islands	N/A	
Washington	N/R	
West Virginia	Most of the complaints received by the SBO concerned the fairness of enforcement (multimedia).	Not all complaints were resolved satisfactorily for the small businesses. A few inspectors and some supervisors still believe that strong enforcement actions come first and then technical assistance. Management has supported this approach in the past, but has agreed to re-examine its enforcement philosophy.
Wisconsin	N/R	
Wyoming	No complaints received.	

N/A Not applicable N/R No response

TABLE F-3
SIGNIFICANT PROGRAM ACCOMPLISHMENTS, AWARDS, AND RECOGNITIONS

PROGRAM	ACCOMPLISHMENTS
Alabama	N/R
Alaska	N/R
Arizona	N/R
Maricopa County	Community Open Forum Plan - Meeting to inform the general public, businesses, and planning agencies on what type of effects and/or restrictions will result from reclassifying the County from moderate to severs for PM10, ozone, and carbon monoxide. "Industry Perspective" was a designated part of the agenda. Home Page Accomplishment - Draft rules and public notices-with a click onto the month, the entire text can be viewed. Customer Satisfaction Survey (evaluation) ensures that program performance exceeds customers' expectations. EPA grant was obtained to coordinate the 1998 SBO/SBAP National Conference in Scottsdale, AZ. Planning meeting held in September 1997; over 20 members met to discuss conference and draft initial agenda. Developed Compliance Incentive Program (CIP) for small businesses (amnesty program). Start date is 4/15/98 and end date is 7/15/98.
Arkansas	During the past legislative session, an Act was passed establishing a Revolving Loan Fund for small businesses. $1 million has been appropriated into this fund. The purpose of the loan will be to assist small businesses obtain a signature loan at 6.8% of the prime lending rate for mandated pollution control equipment and P2 activities.

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
California	The Ombudsman Office routinely managed the ARB 1-800 public information hotline and the ARB e-mail help-line, in addition to providing regular information updates on ARB's Internet web site. The Office responded to over 300 help-line calls and over 900 e-mail inquiries. It routinely investigated and resolved stakeholder concerns ranging from complaints about poor air quality to dissatisfaction with air quality rules and regulations. The Office places a strong emphasis on customer service, tracking a particular individual's request to its conclusion and checking that it has been taken care of the individual's satisfaction. The Office took lead responsibility for holding 2 Stakeholder Forums in April and June 1997 on rice straw burning in the Sacramento Valley. Over 150 stakeholders, including farmers, public health professionals, entrepreneurs, finance and investment professionals, legislative staff, and government representatives were brought together. Each of the day-long facilitated sessions was aimed at identifying key points of consensus to bring about solutions to the management of rice straw burning in the Sacramento Valley. Results of the forums included consensus about the need for funding for rice straw burning alternatives demonstration projects. Language was subsequently inserted into the Thompson (SB 318) bill signed by Governor Wilson that will provide $5 million over the next 2 years for such demonstration projects. The Office tracked and submitted comments on the sufficiency of public involvement in 10 of the Board's regulatory items in 1997, including regulations for portable equipment, marketable emission credits, consumer products, air toxics, and emission control test procedures. The Office augmented stakeholder outreach efforts, contributed to stakeholder involvement in regulatory development workshops and board hearings, and helped facilitate resolution of stakeholder regulatory concerns. The Office provided lead responsibility and support for 10 Cal/EPA Ombudsman Outreach Forums during the spring and fall of 1997. Over 250 stakeholders attended the forums, which addressed topics ranging from updates on risk assessment and air quality health standards to simplified environmental permitting and compliance. Pursuant to the Governor's Executive Order W-144-97, the Office provided an Ombudsman training course for Agency Undersecretaries in February 1997 with a follow-up training effectiveness survey in September 1997. The Office helped organized and hold a 3-day conference entitled, "Exploring New Technologies for Clean Air," September 29-October 1, 1997. Approximately 250 people attended the conference that was aimed at identifying technologies and strategies to help CA reduce emissions to meet obligations in the U.S. EPA's approved 1994 State Implementation Plan. As a result of the 1996 Air Quality Stakeholder Visioning Forum Series involving many of our stakeholders, the Ombudsman's Office worked with ARB's Communications Office to carry out an 8-week air quality public awareness campaign entitled, "Success Is In The Air." It chronicled much of the air quality improvement that has occurred over the last 20 years and also recognized many of the challenges that are ahead of us and yet to be overcome. "Success Is In The Air" was featured in many CA newspapers, including the LA Times, San Francisco Chronicle, and Sacramento Bee (McClatchy newspaper in the Sacramento and Fresno areas).

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
California (cont.)	As an ongoing effort, the CA Air Pollution Control Officers Association (CAPCOA) and ARB Business Assistance Committee is a partnership between the ARB and CAPCOA, which meets routinely to discuss and provide assistance and regulatory issues that affect the regulated community within CA. In addition, the Committee develops statewide assistance materials for assistance providers. In 1997, the Committee completed the CA Resource Manual for Air Quality Business Assistance Programs, which describes the resources available at the local, state, and federal levels. In addition, the Committee established a web page on the ARB web site (www.arb.ca.gov) to increase communication and information within CA on assistance issues. The Committee includes members representing the 35 air pollution control districts, business associations (NFIB, CA Autobody Association, CA Service Station and Repair Association, CA Chamber of Commerce, Small Business Coalition of Southern CA, and the CA Manufacturers Association), U.S. EPA Region IX, and CA Trade and Commerce Agency.
Kerns	We implement our requirements, but are not viewed as "heavy handed."
South Coast	Financial assistance -- loan guaranties and assistance with preparing loan packages for unguaranteed loans. Clean Air Ambassador Program -- A survey of business opinions on air quality and air quality compliance. Clean Air Solution Center -- A center for displaying compliant technologies. Permit Assistance Centers -- Provide convenient local offices for businesses within the air basin. Problem solving and advocacy for agency reform. Red Team activity -- Program serves as liaison/expeditor for large, complex projects in need of permitting. Building and Safety Department outreach program to increase awareness of program services to small businesses.
Colorado	Sent out 900 dry cleaner books and letters to further assist dry cleaners understand requirements. Presently in the process of getting all dry cleaners' federal reports on file. Both SBAP staff members received an award from the CO Korean Dry Cleaners Association for helping their group to attain compliance and for helping individual dry cleaners to better understand the rules. Helped create guidance documents for chrome plating. Guidance consists of 3 sections: one for inspectors, one for permit writers, and one for the sources.
Connecticut	CT received several letters to the editors of local newspapers commending the Department for outreach efforts related to Title V permitting. The CAP and SBAP had great success in working with the metal finishing association to open a dialogue on how to achieve compliance. Contacts between members of the CAP and the industry were the key to establishing a relationship for meaningful dialogue. However, in general, this has been a very difficult year for media coverage of proactive approaches to compliance. SBAP and CAP have struggled with finding effective ways to get the word out when overwhelmingly the media has focused on negative reporting. Additionally, letters of commendation were submitted to the Governor and the Commissioner for efforts related to the FAST Vs outreach program. Positive feedback also has been received from staff in other states for providing training to them.
Delaware	N/R

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
District of Columbia	About 30 dry cleaners avoided fines because of the alliance the SBTCP formed with the compliance inspectors. When inspectors found that a dry cleaning facility is not in compliance, instead of giving a ticket, he would hand them a brochure with the SBTCP contact. The dry cleaners were able to get assistance instead of a fine.
Florida	SBAP staff is a member of a workgroup for implementing the requirements of 112(r). Workgroup consists of industry representatives and state agency representatives. Program implementation will be done by Department of Community Affairs with technical support from Department of Environmental Protection. The SBAP will play a role by providing help to small businesses. Staff received training for risk management plans. Lorraine Clark, SBAP staff member, shared in a division team award for her work with implementing the dry cleaner notification and general air permit program. The SBAP is actively developing partnerships with the Small Business Development Centers to expand outreach efforts to as many small businesses, new or established, about all environmental regulatory requirements. The program is continuing to develop "Just the Fact" information sheets for specific air sources.

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Georgia	SBAP published a newsletter, which featured articles on the SBAP, SBO, Section 1212(r) issues, regulatory updates, and an event calendar. Two issues were mailed to approximately 7,000 small businesses. SBAP co-hosted the first Region IV Small Business Conference in October. SBAP prepared 3 compliance assistance documents in 1997: commercial printers, commercial bakeries, and Stage I and II facilities. SBAP, CAP, and SBO met four times in 1997. CAP chairperson and SBAP coordinator attended the second CAP training in Scottsdale, AZ. SBAP coordinator represented the Region IV states at the third annual Small Business Liaison Conference in Arlington, VA. SBAP developed and mailed a survey to all 50 states and US territories to learn the level of multimedia activities in other states and gain an understanding of the problems encountered in starting a multimedia program. SBAP is representing the Air Branch in a multimedia initiative designed to prepare a compliance assistance manual for the automotive repair industry. SBAP hosted a focus group meeting with stakeholders from GA and FL to establish a compliance assistance center for the chemical industry. SBAP compiled a glossary of commonly used environmental terms for in-house use. At the National Ombudsman's request, we mailed the glossary to EPA headquarters for inclusion on Karen Brown's web site. We also sent a copy of the "Permit Guide for Commercial Bakeries" for inclusion on the web site. SBAP prepared a list of resources for inclusion in IA's Small Business Resource Guide. This is the first time we have been included in the guide. SBAP mailed a dry cleaning brochure to 1,000 facilities requesting perc usage data, offering videos for training, and notifying them of upcoming compliance inspections. We received more than 200 requests for videos and information on perc use. SBAP mailed letters to hard chromium users reminding them that the notification of compliance status form was due on 2/24/97. All of the hard chromium users responded and all are now in compliance.
Hawaii	N/R
Idaho	None

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Illinois	Projects: Clean Break Environmental Amnesty, Gold Star Program, Greater Chicago P2 Project, and Great Printers Project. Partners: IL EPA Office of Small Business, IL State Fabricare Association, federal/state and local partners, Printing Industry of IL. SBAP also coordinated: Degreaser workshops, Dry Cleaner Town Hall meetings, Green and Profitable Printing teleconference, Dry Cleaner Survey of Compliance Assistance Effectiveness, Southern IL Environmental Managers Association Annual Conference, and phone survey of 200 dry cleaners. Active participants in: IL Small Business Development Center Network quarterly and annual meetings, Waste Management and Research Center Program Advisory Panel, Printers National Environmental Assistance Center (PNERAC) Advisory Board, Association of Small Business Development Centers (ASBDC) Environmental Committee, and National Pollution Prevention Roundtable Small Business Committee.
Indiana	CTAP designed and implemented a searchable database on our 5-Star Environmental Recognition Program for Dry Cleaners. This database allows potential customers to locate environmentally-responsible cleaners in their area. The database may be found at www.ai.org/idem/ctap/recognition/cleaners/search.html. CTAP received good press coverage of our awarding 5 Stars to the Nu Yale Dry Cleaners in Jeffersonville, IN. Such coverage should bring more business to this dry cleaner and encourage other cleaners to participate in our recognition program. This program has been used as a model in other states. CTAP's Mercury Pledge Program is being used as a model in WI and has been highlighted by Region V. CTAP and a number of partners are working to create an integrated compliance system to assist the regulated community in complying with the multitude of regulations that affect them. Implementing a pilot project of the integrated compliance system is planned for 1998.

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Iowa	1. The following guides/materials were published in 1997: > *Air Emissions Guide for Chromium Electroplaters* -- This guide is designed to assist chromium electroplaters with the chrome NESHAP and applicable air permitting requirements. The guide includes a flow chart to determine the applicable regulatory category under the NESHAP. Reporting forms and specifically designed recordkeeping tools also are included. > *Resource Guide to Small Business Air Emissions Assistance* -- IAEAP developed this reference guide for assistance providers in 1995. Since then, IAEAP updated the guide every year. It was made available at the annual SBAP conference in February 1997. > *112(r) Applicability Guide* -- This guide helps users determine 112(r) applicability and assists with program category determination. The guide also includes a brief overview of the regulations and the list of regulated pollutants under 112(r). The IAEAP also conducted 6 112(r) workshops jointly with EPA throughout the state. 2. Peer Match: Under EPA's Peer Match program, IAEAP continued to provide hands-on training opportunities for other assistance providers. In 1997, Janet Goodman from NV SBAP and Larry Watkins from SCAQMD visited IA under the Peer Match program. Last year, IAEAP was one of the two programs selected by EPA for Peer Match training. 3. Spreadsheet-based Emission Estimation Programs: IAEAP developed industry-specific spreadsheet-based emission estimation programs to generate emission inventories and estimates for permit applications. Input data is collected from small businesses using a 2-4 page industry-specific questionnaire. In 1997, a program for grain handling facilities was developed. IAEAP already developed programs for small manufacturing operations, dry cleaning (perc and petroleum solvent users), and printing. 4. Program Effectiveness Measurement: IAEAP deeps track of client assistance in two ways: A) Brief Assistance involves <1 hour of staff time, and B) Detail Assistance comprises on-site assistance or assistance involving >1 hour of staff time. All clients receiving detail assistance are requested to complete a survey after the completion of the assistance process. 5. Voluntary Disclosure Policy: IAEAP and the SBO worked with IA DNR to draft this policy, which will allow sources operating without construction permits to disclose their non-compliance status, submit a compliance plan, and avoid any enforcement action from the state regulatory agency.

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Kansas	SBO developed an interagency work group comprised of SBA, SBDCs, KS Department of Commerce, KS Department of Human Resources, KS Department on Aging, Secretary of State, and other agencies that work with businesses. Group meets quarterly to network and discuss how to better meet the needs of KS small businesses. Group is developing seminars across the state for 1998 to help small businesses understand their responsibilities with various regulations, determine business funding sources, business planning, etc. First seminar is planned for March 1998 in Topeka. SBO chairs the work group and is secretary for the subcommittee planning the seminars. SBO organized the 1997 environmental conference held in Lawrence. The focus was communication and included two general sessions and 28 different concurrent sessions on environmental regulations, P2, case studies, etc. P2 awards were presented to businesses and communities that achieved outstanding reductions in pollution. Over 200 attended this conference.
Kentucky	Initiation by the SBSSAP of meetings with the Natural Resources and Environmental Protection Cabinet to evaluate the program and to emphasize the need for a multimedia small business assistance program. Endorsement by the SBSSAP of proposed legislation to stagger CAP member terms and add two additional small business slots to the Panel membership. Legislative member of the Panel volunteered to sponsor the legislation in the 1998 General Assembly. Initiation by the SBSSAP to establish a Small Business Stationary Source Environmental Stewardship Award by the Division for Air Quality, Department of Environmental Protection. Preparation of a pamphlet about success stories of the SBEAP by the AQRSB. Continuing recognition of value of KBEAP services by clients and DAQ. Increased involvement of SBSSAP members in program development. Increased coordination of information and ideas by AQRSB/SBSSAP/KBEAP adding to the success of the program.
Jefferson County	N/R
Louisiana	SBAP assisted Permits with permitting reviews. SBAP participated in planning the SBO/SBAP annual conferences. SBAP represents 5 states in EPA Region VI in national SBAP matters. SBAP attended professional training courses: permits, accident prevention, hazwoper refresher, hazardous waste, and solvent alternatives. Vic Tompkins won a Special Achievement by a Team award for the WWW Task Force. Assisted in the development of the Best Management Practices Plan for shipbuilders. Assisted EPA in evaluating an organization to develop and operate a Chemical Industry Compliance Assistance Center.
Maine	Helped develop and implement the "Environmental Leader" program, a multimedia compliance assistance program for gasoline stations and associated automotive repair facilities. The program has recognition component that uses market forces as an incentive for increased compliance within this industry.

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Maryland	In cooperation with the Printing Industries of Maryland (PIM), EPA Region III, the Environment Project at Catonsville Community College, and MDE's P2 Program, the SBAP developed the MD Green Printers Initiative. The goal of this project was to provide lithographic printers with understandable information on their environmental requirements (air, water, and waste) and specific P2 measures that would enable printers to potentially go beyond compliance. Hosted by the National University of Honduras, the SBAP director visited Honduras and met with national and local government agencies responsible for environmental and public health protection, with non-governmental organizations active in environmental advocacy and protection programs, and with businesses whose activities impact the environment. The purpose of the visit was to exchange information on environmental protection activities with a focus on P2 and small business assistance.
Massachusetts	Three programs received the 1997 Governor's Toxics Use Reduction Awards. The programs were submitted as a group under the title, "Volunteer Partners," and identified the trade associations and consulting firms that donated huge amounts of time to the design and implementation of three innovative programs. > *Massachusetts Printers Partnership* -- Printing Industries of New England, Mabbett & Associates, Goldman Environmental Consultants. > *Dry Cleaners "Compliance Technician" Training Program* -- NorthEast Fabricare Association and Korean Drycleaners Association of New England. > *Collision Repair Auto Shop Help (CRASH) Course for Compliance and Pollution Prevention* -- MA Auto Body Association. Also in 1997, OTA (where SBAP resides) received the Governor's highest unit citation for efficiency and excellence, the Manuel Carballo Award.

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Michigan	**MI Clean Air Ombudsman** The Clean Air Act Ombudsman's office receives a number of compliments from both internal and external customers. Typically, these are received via face to face conversations or over the phone. Customers are extremely appreciative of our ability to quickly gather data, track permits, and sort out confusion that sometimes exists between technical agency staff and businesses. **MI Small Business Assistance Program** This past spring, MI's SBAP, also known as the Clean Air Assistance Program, presented a series of New Source Review (Permit to Install) workshops focusing on applicability and how to fill out the Permit to Install application. The workshops were developed and delivered by SBAP staff. The workshops took place at four sites statewide and were delivered according to the need and level of the participant's expertise: 1) There was one workshop for consultants. 2) A second series of three statewide workshops was held to assist businesses with their determination of applicability to the Permit to Install. 3) A third series of three workshops was held on how to fill out the Permit to install application. Interest and attendance at each workshop were positive, receiving more than 500 attendees. The CAAP continues to address the needs of business and industry with the development of "industry guides," which approach compliance from a multimedia, multi-agency perspective. The object of these guidebooks is to encapsulate all the regulatory requirements for a single industry into one simple to understand document. Recently, MI's CAAP assisted in the development of a guidebook for the lithographic printing industry. As an enhancement for this and other future guidebooks, MI's CAAP developed recordkeeping forms for sources exempt from the New Source Review program. The CAAP also created Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) emission calculation worksheets to assist with the permitting compliance requirements by specific industries (e.g., the lithographic printing industry). MI's CAAP is part of a wider multimedia agency called the Environmental Assistance Division (EAD). EAD is dedicated to providing timely and effective information and assistance to MI's businesses, public agencies, and the general public in understanding and marketing their environmental protection responsibilities.

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Minnesota	SBO worked successfully with staff from the Hazardous Waste Division to draft legislation that merged two fairly "prescriptive" small business loan programs into a revised loan program that is largely "non-prescriptive" in nature. The MPCA's Small Business Environmental Improvement Loan Program offers low-interest loans to small businesses to finance new equipment purchases that help meet or exceed environmental requirements or for costs associated with the investigation and clean-up of hazardous materials. The program is administered by the SBO. Oversight is provided by a screening/steering committee composed of other MPCA media staff and staff from the MN Technical Assistance Program and the Office of Environmental Assistance. Approximately $250,000 in loans were awarded to seven small businesses during the first (and only) loan cycle held in 1997. SBO and SBAP participated with various MPCA media staff, other state agency officials, and industry representatives to successfully launch a multimedia, partnered initiative with the concrete products industry. The goals of the initiative are: 1) to develop a simplified, sensible regulatory system that encourages environmental compliance; 2) to encourage waste reduction, waste reuse, and recycling; and 3) to improve communications and information-sharing on environmental management issues. The initiative is proving to be a good testing ground for working through multimedia issues. SBAP coordinated the development of a comprehensive multimedia guide for automotive repair and body shops. The "Environmental Guide for Automotive Service Providers" contains fact sheets and self-audit checklists on regulatory requirements and P2 opportunities for the subject business sector. The SBAP also composed a series of environmentally-related articles for print in various newsletters sent to automotive repair and body shops. SBAP utilized the Wood Finishing Leadership Grant to: develop a compliance guide for the Wood Furniture Manufacturing NESHAP's Work Practices Standard; establish an enforcement waiver for wood finishers; rewrite the hazardous waste and air quality self-audit checklists; establish and publish "The Finish Line" newsletter; and develop ½ day multimedia and P2 workshops for the small and medium wood finishing shops.
Mississippi	N/R
Missouri	The Business Assistance Unit, in cooperation with the P2 Unit, completed the Vehicle Maintenance Guidance Document and mailed it to vehicle maintenance facilities in MO. In addition, we worked extensively on and have almost completed guidance documents for the rock quarry industry and the printing industry. The Business Assistance Unit updated the Department's *Environmental Permits and How to Obtain Them*, and wrote the *Permit Guidance Document* to accompany it. The *Permit Guidance Document* explains why a business would need environmental permits and how they can tell if they need one. The Business Assistance Unit, along with various members of industry, is serving on two work groups for the Air Pollution Control Program. One work group is changing the construction permit rules and rewriting the construction permit application to make it easier for a business to know if they need a permit and to make the application easier to complete. The other work group is looking at asbestos regulations.

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Montana	SBO created a small business energy and environmental assistance loan program by securing funds from the federal Department of Energy and by partnering with the MT Department of Commerce for administration of the program.
Nebraska	This program started in 1992 with a staff of one person. The first year, no site visits were completed. There has been a steady increase in site visits starting in 1994 with 32, 35 in 1995, 42 in 1996, and 70 in 1997. This is a positive upward trend that will continue. One of the companies that the SBAP started with in 1995, Thurston Manufacturing, has moved from a Class I major source to a Class II minor source in the use of VOCs. This company also was given an award by the EPA for its efforts. The environmental and safety engineer from Thurston Manufacturing still calls and discusses ideas on how to improve their business. The company also is a peer exchange contact for other businesses that would like to improve in the area of environmental compliance. NE Department of Environmental Quality is very proactive in developing a balanced approach to compliance assistance and enforcement. The agency has provided the Public Advocate with technical assistance in all areas. This assistance has made the SBAP a true multimedia program. The benefit to NE to hard to quantify, however it is clear that this program is a positive and well-accepted practice to ensure that business and industry in this state can get answers and assistance through the Public Advocate.
Nevada	The NDEP, Bureau of Air Quality has significantly reduced the backlog of permits pending issuance for new or modified sources. The Bureau is in the process of reviewing the air quality regulations to make them more comprehensive. Washoe County District Health Department, Air Quality Management Division has a quick turnaround on permit applications and this has helped new businesses relocate to the area. This also has facilitated business processes for existing businesses renewing their permits or making changes. The WCDHD has added staff to ensure this process continues and that staff focuses on providing additional assistance when needed for businesses. The Business Environmental Program is part of the NV Small Business Development Center located at the University of Nevada-Reno. The program provides third party, free and confidential assistance for hazardous waste management and air quality issues within the state. The program is contracted by the NV Division of Environmental Protection (NDEP) to provide hazardous waste assistance and the SBAP/SBO office to provide air quality technical assistance.
New Hampshire	The NH program has been very successful in spite of the fact that only one person is assigned to it on a full time basis. The reason for our success is in the effective partnerships that have been developed in-house and externally. Through information sharing, development of a resource network and the ability to use assistance material developed by other providers and modified for use in NH, we are able to be very efficient in providing services. An example of our partnership effectiveness is in the accomplishments we have made in the auto repair industry. By developing a multimedia compliance manual with regulatory and industry input, we obtained over 50% penetration in this sector. Based on preliminary figures from our follow-up on-site assessments, we expect that our efforts will result in 800 to 1,000 individual regulatory non-compliance issues being resolved. Although the non-compliance issues will range from labeling violations to lack of a permit, there likely will be up to 1,000 less technical violations in this sector.

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
New Jersey	NJ CAP team has been highly effective in initiating its charter, mission statement, goals, and priorities over the past year. Although only in its first year of existence, the group has been able to prioritize and target its activities towards optimum effectiveness by recognizing that rather than attempting to cover a very broad scope of activity in a superficial manner, it has focused on high priority issues in a concentrated manner, with greater impact. The CAP has been pointedly requesting input from some of the most representative small business sectors impacted by clean air regulations in NJ. These include members of the plating, printing, and dry cleaning industries. NJ CAP recognized that in approaching its mission through trade groups, the danger existed that these groups would force their agendas, rather than provide constructive input. For this reason, whenever members of these groups found fault with, or ambiguity in, the regulations as they are now promulgated, the onus was placed on them to suggest improvement and clarification of areas with which they took issue.
New Mexico	N/R
New York	The SBO coordinated two successful seminar series in 1997. The seminar series for dry cleaners was attended by 23% of the industry in the state, and the Part 201 Scoping Session Workshop for small business service providers was attended by 11% of the companies contacted. In 1997, the SBAP responded to more than twice as many hotline calls and conducted three times as many on-site assistance visits as it did in 1996. However, there was no corresponding increase in either the SBAP budget or its staffing level in 1997.
North Carolina	Newly established Environmental Permit Information Center (EPIC) developed to provide multimedia information on permit requirements, key contacts for specific permitting programs, and other advice to clients. Increased contacts significantly for the office. Participated in state Air Toxics Taskforce meetings, resulting in the Toxics Branch adopting rules and procedures to make the program simpler for small business and more targeted to possible problem industries or industry types, based on air toxics inventory of 1996 (completed in 1997). The work of the SBO/SBAP over the past several years resulted in significant savings for small businesses in NC. Efforts to provide information about the equipment operation and insignificant or very small emissions of several types of small businesses have resulted in listing them in the "Insignificant Activities" rule or the "Exclusionary" rule that requires a Small Permit, not a Title V permit. A benefit is reduced or no recordkeeping, which is a significant savings to small businesses. The number and frequency of permit application assistance increased again as our clients tell their friends about this service. The 45 on-site permit application assistance activities in 1997 are probably the most that can be accomplished by the 2 engineers in the program along with the other duties they provide in regulatory review and outreach.
North Dakota	N/R

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Ohio	**SBAP** Provided on-site assistance to 198 small businesses, including 86 dry cleaning facilities. Assisted with the completion of 260 permit applications. Wrote Engineering Guidance on calculating emissions and documenting permit exemptions for small printing operations; guidance is used by all permitting personnel and field staff throughout the Agency. The SBAP received special thanks from the Printing Industry of OH for its efforts in helping small printers. Established positive working relationships with the 15 OEPA field offices responsible for facility and inspection work. **SBO & SBAP** One of the 1997 projects supported by the OH Air Quality Development and the OEPA (with direct assistance from SBO and SBAP staff) was a systematic evaluation of ENVIROPRINT (a 1995 joint effort with Printing Industry of OH to improve the environmental performance of the printing industry via the production of an industry-specific "self help" environmental manual and a series of regional seminars. The follow up exercise included: focus groups of printers who had used the ENVIROPRINT manual, revisions to the manual based on comments from users and agency reviewers, and a state-wide telephone survey to determine whether the program was useful -- and whether or not ENVIROPRINT actually produced operational changes within the printing industry. We concluded that the program exceeded our expectations in that it: 1) demonstrably changed industry attitudes and operations in an environmentally beneficial manner; 2) enhanced the OEPA's understanding of the industry and greatly improved and consistency of regulatory efforts; and 3) resulted in at least one major buyer of print products requiring all its print suppliers to certify compliance with ENVIROPRINT recommendations, including such factors as environmental assessment, emissions inventory, documentation of permit status, and an active P2 program.
Oklahoma	The SBAP in OK, as part of the Customer Assistance Program, continues to receive very positive feedback from our customers. We believe we have continued to improve our focus and our ability to deliver assistance that is timely, accurate, and sensitive to the small business community. Most business owners are very surprised when they discover the service we provide. One of the most common exclamations we hear is, "I can't believe the government provides such a service!"

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Oregon	During this reporting period, the SBAP, in partnership with the CAP, continued to implement a very successful comprehensive technical assistance program. Major accomplishments were: > Approximately 65 tons of HAPs were removed from OR's airsheds. > Administered area source NESHAP outreach project. > Assisted 5 small businesses with P2 tax credit applications. > Sponsored or participated in 6 workshops and 1 satellite teleconference. > Provided P2 assistance to 38 small businesses. > In cooperation with the Pacific Northwest P2 Center, published P2 workbooks for the metal finishing and wood coating industries. > In cooperation with the Northwest P2 Center, published 10 fact sheets. > Initiated program to incorporate environmental studies into community college curricula. > Distributed written information to more than 900 individuals and business sources. > Responded to approximately 400 telephone inquiries.
Pennsylvania	A major accomplishment of the CAP was the appointment of a new SBO. PA's program had been without an SBO for almost 1.5 years; this affected CAP participation. Our CAP Chairperson, Glenn Heilman, represented small business perspectives on air quality issues, including CAP activities, on these occasions: testified before U.S. Senate in April 1997, interviewed by CBS Evening News in June 1997, and testified before U.S. House of Representatives in October 1997.
Puerto Rico	N/R
Rhode Island	The 1997 Office of Technical & Customer Assistance Consultant's Day Presentation attracted over 40 environmental consultants in September. Representatives from the SBAP spoke about the functions of the program and gave specific examples of how the program provides compliance assistance to small business.
South Carolina	SBAP has taken part in 112(r) workshops sponsored by the agency. SBO has given a joint presentation with OSHA representative about the relationship between PSM and RMP. This was a good way to help businesses already affected by PSM and those that were not to understand what the new Risk Management Plan Rule is going to require. SBAP also is involved in the CBEP project in Charleston, SC.
South Dakota	N/R
Tennessee	Efforts are underway to become a multimedia program. By rearranging interdepartmental funding mechanisms and combining program efforts with P2 efforts, this can be accomplished. We have been approved to unfreeze positions that were established for the program. The program has been staffed at 50% of its approved budget.

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Texas	To provide better service to small businesses and to leverage our resource to gain the maximum amount of effort for our dollar, the TX SBAP has initiated a Site Visit Program. Through this effort, we are able to provide free, confidential site visits to small businesses by contracting with a private environmental consultant. In a related effort, the SBAP expanded it TX EnviroMentor Program, a volunteer effort of environmental professionals coordinated through the SBAP. To date, the 50+ volunteers have saved businesses $15,717.50 through 18 site visits. During the spring and summer, the SBAP put on a series of extremely successful RCRA workshops. The SBAP specifically designed these workshops to focus on waste regulations that are most likely to affect small businesses and to be a practical hands-on course that also would provide businesses with a tool they could use after they returned to their shops. The workshops were well received, and several more had to be added because of the demand. Foundry Initiative -- During FY1997, the SBAP conducted an Foundry Initiative. As part of the effort, the SBAP held workshops to teach foundries how to comply with environmental regulations. At the beginning of each workshop, the SBAP administered a written survey of compliance indicators. 90 days after the workshop, the participants received the same written survey and were asked to complete it based on the changes they made because of the workshop. 17 foundries completed the initial questionnaire. Using these 2 compliance indicator tools, the SBAP determined that the workshops led to an increase in compliance for foundries in the following areas: air -- 17% increase and waste -- 7% increase. Wood Industry Initiative -- SBAP increased compliance in the Wood Products Manufacturing industry by 87%. From July 1996 to July 1997, the SBAP distributed information to wood products manufacturers through workshops, mailings, and our hotline in anticipation of enforcement inspections beginning in September 1997. During FY97, the SBAP also increased the known universe of wood products manufacturers from about 940 to 1,486. From FY96 to FY97, our hotline calls from this industry increased from 167 to 436. To benchmark how effective our outreach efforts would be, the SBAP conducted over 50 site visits in the Dallas-Fort Worth area early in FY96. These visits were not enforcement related, but we did look for "compliance indicators" on our visits. During our visits, we found 100% noncompliance with parts of our rules. Most of the problems related to air violations, because the shops could not comply with the standard exemption in place, or they did not have an air permit. Beginning 9/1/97, the TNRCC began conducting enforcement inspections for this industry. As of late December 1997, with 12 regions reporting in, the TNRCC had conducted 145 inspections. Only 11 Notices of Violation were issued, all of which were administratively resolved at the regional level.

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Utah	Policy Development -- Facilitation of the Department's Small Business Work Group. Developed forms and guidance documents for small source permitting. Businesses with emissions less than 5 tpy/criteria pollutant, less than 500 pounds per hazardous air pollutant, or less than a 2,000 pound combination of HAPs. These documents included the registration form, a brochure explaining the new rule, and emission estimate guides for criteria pollutants and hazardous air pollutants. The following business categories have been developed: printers, wood furniture finishers and refinishers, and auto body. Developed generic inspection checklist for small businesses to evaluate compliance at their facilities.
Vermont	N/R

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Virginia	SBAP is proud of our association the EPA's Office of Compliance, Chemical, Commercial Services, and Municipal Division in the development and completion of 2 pilot projects for Korean dry cleaners: the development of a video depicting the realities of an EPA inspection, which provides compliance assistance through a focus on the multimedia requirements for dry cleaners impacted by the federal dry cleaner regulation; and the "Partners in Perc Project," which is a "coaching program" sponsored by EPA and Greater Washington Korean Dry Cleaning Association, which uses the association's area directors as coaches to provide one-on-one compliance training to members. Both projects provide a foundation for national utilization by EPA and SBAPs, as well as a model of cooperation for future projects. SBAP continues to be very proud of the receipt of EPA's Leadership Grant to explore and provide compliance assistance and P2 information through the Internet and the develop our web site. Development almost is complete, and we are looking forward to training the small businesses and providing this resource. Please visit us at www.deq.state.va.us/osba/smallbiz.html. Since the beginning of the SBAP, compliance outreach activity has reached more than 4,900 individuals or businesses. General and technical workshops, materials, and information have been provided to dry cleaners, electroplaters, wood furniture manufacturers, printers, solvent degreasers, quarries, chemical and plastic manufacturers, sawmills, metal fabricators, machinery manufacturers, and others. The legacy of direct compliance outreach to VA's dry cleaners has been very successful in helping these businesses achieve an 87% + compliance rate with the federal reporting requirements. The outreach was a joint effort of the SBAP, the Air Toxics program, and trade associations. Small business advocacy in regulation and policy development continues to be a priority of the SBAP. The program director has continued to participate locally and nationally in regulation development and policy matters affecting small businesses. Of particular note is the development and adoption of VA's General Permit Exclusionary Rule and participation in EPA's national workgroup looking at the dilemma of Potential to Emit (PTE) for small sources. Title V/Title III - Industry and DEQ partnership. Over a 2 + year period, a committee composed of DEQ central office staff from permit assistance and the small business/air toxics sections, DEQ regional permitting staff, and representatives from several major furniture manufacturers and the American Furniture Manufacturers Association have developed a model Title V permit. Produced and generated a closed-loop teleconference compliance workshop for wood furniture manufacturers dealing with the wood furniture MACT. Partnering with the Manufacturing Technology Center located at Wytheville Community College, I believe that this was the first use of the VA Distance Learning Network for delivery of regulatory information to regulated facilities at selected Community College reception sites that geographically corresponded to the location of impacted facilities. The Network is a real-time, two-way interactive telecommunication system, which provides the ability to utilize various types of presentation formats (overheads, computer generated slides, 35mm slides, video tape, Internet, and remote broadcast). This was an excellent tool and an excellent workshop; it was very well received.

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Virgin Islands	We are in the process of bringing on board 2 additional engineers, 2 environmental specialists, 1 administrative assistant, and/or 1 enforcement officer. The SBAP Coordinator has been assigned the dual role as the SBO/SBAP.
Washington	> Presentation to approximately 30 fiberglass manufacturers. > Information flyer sent to approximately 320 small business sources concerning agency's basic requirements and who to contact for more information. > Spray coating flyer issued to approximately 40 businesses. > Outreach project to approximately 3 dozen gas stations regarding State II vapor recover systems. > Conducted joint business assistance visits with Department of Ecology's Toxic Reductions unit. > Participated in Interagency Regulatory Analysis Committee (IRAC) Expo for businesses. > Secured grant. > Developed guidebooks for gas dispensing, lithographic and screen printers, and surface coating. > Developed information sheets: "Registering Your Business with SCAPCA," "Installing and Maintaining Bagladies," "Common Environmental Permits Required in Spokane County," "Understanding Solvent Cleaning and Air Quality," and "Obtaining a Notice of Construction Approval." > Developed an information newsletter.

N/A Not applicable N/R No response

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
West Virginia	> SBO has obtained a commitment from the Director of the WV DEP to reconsider the Division's enforcement philosophy. > A bill to provide a low interest loan program for small businesses to pay for environmental projects will be introduced to the Legislature in January 1998 and is expected to pass. > WV DEP Director has agreed that the SBO should also serve as the multimedia Ombudsman and that appropriate legislation should be presented to the Legislature. SBAP has continued periodic meetings with various other agencies and organizations that provide environmental compliance and P2 assistance to businesses (small-medium sized). The intent has been to increase the effectiveness of the individual programs by extending the client bases and coordinating efforts to assist these clients. These groups include: WV DEP Pollution Prevention Services; WV DEP Waste Minimization; The Marshall University Center for Environmental, Geotechnical, and Applied Sciences; The West Virginia University Industrial Extension Service; and The National Institute for Chemical Studies (NICS). Work on a joint outreach/information multimedia "environmental assistance" poster is nearly complete. The group has loosely termed itself the "WV Environmental Assistance Coalition." SBAP devoted 2 people for developing general permits. A coal handling/preparation general permit was finalized in December 1997. Other materials-handling general permits should be developed in 1998. Intensive outreach to dry cleaners to assist with compliance certification and recordkeeping was continued in the first quarter. Then, a follow up enforcement inspection was conducted in the third quarter. Afterwards, a survey was conducted with the following results (based on a return of 12 out of 35 surveys and rated on a scale of 1 to 5, with 5 being "excellent"). > Timeliness of assistance -- 4.64 (92.8%) > Quality of assistance -- 4.82 (96.4%) > Professionalism of assistance -- 4.83 (96.6%) > Knowledge of air quality requirements -- (92.6% improvement): Before -- 2.42 (48.4%) and After -- 4.66 (93.2%) > Compliance with requirements -- (70.7% improvement): Before -- 2.83 (56.6%) and After -- 4.83 (96.6%)
Wisconsin	Pam Christenson testified before the house subcommittee on HR96 on behalf of the 507 programs.
Wyoming	On 7/1/97, the Department established the Office of Outreach and Environmental Assistance within its non-regulatory Administration Division. This Office includes the SBAP coordinator, the SBO, plus a P2 coordinator and an emergency response coordinator. The functions and duties of the SBAP and SBO have not changed through the consolidation of Department's outreach and compliance assistance activities. The SBAP continues to serve as secretariat to the CAP. By maximizing available resources, the outreach and assistance activities should increase in the coming year while annual estimated budget of the SBAP, SBO, and CAP will remain constant at existing levels.

N/A Not applicable N/R No response

APPENDIX G

COMPLIANCE ASSURANCE ISSUES

TABLE G-1
COMMON COMPLIANCE PROBLEMS

Program	Not understanding regulatory requirements	Operating w/out permit	Incomplete records	Uncertain of permitting requirements/ need multiple permits	Uncertain how to determine emission inventories/ lack of tech expertise	Uncertain how to complete forms/ complicated paperwork	Lack of financing for equipment	Operating outside NSPS or MACT	Improper storage/ disposal of hazardous waste	Fear of regulatory agency/ arbitrary regulatory enforcement	Failure to use right equipment to comply w/standards	Other*
Alabama	X		X	X		X			X	X		
Alaska	X	X	X	X	X	X	X	X	X	X		
Arizona	X	X	X		X	X	X		X	X		
Maricopa Cty	X	X	X	X	X	X	X	X	X	X	X	
Arkansas	X	X					X		X	X	X	
California	N/R											
Bay Area	X	X	X	X	X	X	X	X	X	X	X	
Kerns Cty	X		X			X						
Mojave Desert	X		X		X	X				X		
Monterey Bay	X		X			X						
Northern Sonoma Cty	N/R											
Sacramento	N/R											
San Joaquin	N/R											
San Luis Obispo	X			X	X							
Santa Barbara	N/R											
Tuolumne	N/R											
South Coast	X	X	X	X	X	X	X	X		X		
Ventura Cty	X	X	X	X	X						X	X
Yolo-Solano	X	X	X	X	X	X	X	X	X	X	X	X

N/R No response

TABLE G-1
(Continued)

Program	Not understanding regulatory requirements	Operating w/out permit	Incomplete records	Uncertain of permitting requirements/ need multiple permits	Uncertain how to determine emission inventories/ lack of tech expertise	Uncertain how to complete forms/ complicated paperwork	Lack of financing for equipment	Operating outside NSPS or MACT	Improper storage/ disposal of hazardous waste	Fear of regulatory agency/ arbitrary regulatory enforcement	Failure to use right equipment to comply w/standards	Other*
Colorado	X		X		X	X						X
Connecticut	X	X	X	X	X	X	X	X	X	X	X	
Delaware	X	X	X		X	X	X			X		
District of Columbia	X		X							X		
Florida	X	X	X			X	X			X		
Georgia	X	X	X	X	X	X				X		
Hawaii	X											
Idaho	N/R											
Illinois	X	X	X	X	X	X	X		X	X		
Indiana	X	X	X	X	X	X	X	X	X	X		X
Iowa	X	X	X	X	X	X			X	X		
Kansas	X	X	X	X	X	X	X	X	X	X		
Kentucky	X	X		X	X	X				X		
Jefferson Cty	X	X	X	X	X							
Louisiana	X	X	X	X	X	X	X	X	X	X	X	
Maine	X		X		X				X	X		
Maryland	X	X	X	X	X	X						
Massachusetts	X	X	X	X	X	X		X	X			
Michigan	X	X	X	X	X	X	X	X			X	
Minnesota	X	X	X	X	X	X	X	X	X	X		
Mississippi	X		X	X	X					X		

N/R No response

TABLE G-1
(Continued)

Program	Not understanding regulatory requirements	Operating w/out permit	Incomplete records	Uncertain of permitting requirements/ need multiple permits	Uncertain how to determine emission inventories/ lack of tech expertise	Uncertain how to complete forms/ complicated paperwork	Lack of financing for equipment	Operating outside NSPS or MACT	Improper storage/ disposal of hazardous waste	Fear of regulatory agency/ arbitrary regulatory enforcement	Failure to use right equipment to comply w/standards	Other[a]
Missouri	X	X		X	X	X			X	X		
Montana							X	X		X		
Nebraska	X		X	X	X	X	X		X			
Nevada	X	X	X	X	X	X	X	X	X			
New Hampshire	X	X		X	X	X			X	X		
New Jersey	X	X	X	X	X	X	X	X	X	X	X	
New Mexico		X			X	X						
New York	X	X	X	X	X	X	X		X	X	X	
North Carolina	X	X	X	X	X	X			X	X		
North Dakota	X		X		X	X				X		
Ohio	X	X	X	X	X	X	X	X	X	X	X	
Oklahoma	X	X		X	X	X		X		X		
Oregon	X	X	X	X	X	X	X	X	X	X	X	X
Pennsylvania	X	X	X	X	X	X	X	X		X		
Puerto Rico	X	X	X	X	X	X	X	X	X	X	X	
Rhode Island	X	X	X	X	X	X	X		X	X		
South Carolina	X	X	X	X	X	X	X		X	X		
South Dakota	X		X		X							
Tennessee	X	X	X		X	X	X			X		
Texas	X	X	X	X	X	X	X	X	X	X		
Utah	X	X			X	X				X		

N/R No response .

TABLE G-1
(Continued)

Program	Not understanding regulatory requirements	Operating w/out permit	Incomplete records	Uncertain of permitting requirements/ need multiple permits	Uncertain how to determine emission inventories/ lack of tech expertise	Uncertain how to complete forms/ complicated paperwork	Lack of financing for equipment	Operating outside NSPS or MACT	Improper storage/ disposal of hazardous waste	Fear of regulatory agency/ arbitrary regulatory enforcement	Failure to use right equipment to comply w/standards	Other*
Vermont	X		X	X	X	X	X		X	X		
Virginia	X	X	X	X	X	X	X	X		X		
Virgin Islands	X	X	X	X	X	X	X	X	X	X	X	X
Washington	X	X	X	X	X	X	X	X		X	X	
West Virginia	X	X	X	X	X	X		X		X		
Wisconsin	X	X	X	X	X	X	X	X		X		
Wyoming	X		X	X	X	X	X	X	X	X	X	

*Other

Yolo-Solano, CA Lack of maintenance and preventive maintenance.

CO Language barriers (non-English).

IN Failure to understand how to comply when 2 regulations from the same or different agencies conflict with each other. Failure to understand the universal waste regulations. Failure to accurately complete the Toxics Release Inventory (TRI) report. Difficulty understanding air monitoring requirements.

OR Lack of P2 knowledge.

N/R No response

TABLE G-1
(Continued)

PROGRAM RESPONSES

Programs were asked for additional comments regarding common compliance issues addressed during the course of providing technical assistance. Individual program responses are listed below.

PROGRAM	COMPLIANCE ISSUES
Alabama	N/R
Alaska	N/R
Arizona	N/R
Maricopa Cty	Program has not been recognized as an option for businesses. We have never had a good list of eligible sites. There is not registration program, etc. Also, this County is growing so quickly and small businesses come and go, move, etc. We are working with the college to start producing a "good" list of small businesses that most likely need a permit, but don't have one. Facilities were not given our name for assistance or time frame for complying by inspectors. Businesses operating without a permit only receive a $70 fine.
Arkansas	Lack of funds for all appropriate permit fees.
California	Since the local air districts issue the permits, this is largely inapplicable at our state level. Our workshops with those we regulate prior to rule adoption are well attended and have excellent participation.
Bay Area	N/R
Kerns Cty	Recordkeeping to show compliance with complex rules is a real burden for the small businessman.
Mojave Desert	Operators, particularly dry cleaners who are not fluent in English, require special assistance.
Monterey Bay	N/R
Northern Sonoma	N/R
Sacramento	N/R
San Joaquin	N/R
San Luis Obispo	N/R
Santa Barbara	N/R
South Coast	N/R

N/R No response

TABLE G-1
(Continued)

PROGRAM	COMPLIANCE ISSUES
Tuolumne	N/R
Ventura Cty	Using non-compliant paints or solvents. Lack of understanding of the English language in the dry cleaning sector and auto body painting sector. Therefore, poor knowledge of permit requirements and rules.
Yolo-Solano	Lack of information - experience shortfall.
Colorado	N/R
Connecticut	Determining whether a regulation applies to a small business continues to be one of the most frequently asked questions. Also, calculating potential and actual emissions continues to be one of the most difficult and time consuming exercises for small businesses.
Delaware	N/R
District of Columbia	N/R
Florida	For the most part, the small business owner desires to comply with all environmental requirements. In some cases, the desire falls short of doing the necessary reporting requirements. The small business owner is busy running the business and finds it difficult to spend part of the day on relatively new and unfamiliar environmental requirements, such as recordkeeping. As it becomes more common place, the good business person will incorporate sound environmental practices in the daily business operation. Part of the SBAP's mission is to instill an environmental philosophy with sound business practices.
Georgia	N/R
Hawaii	N/R
Idaho	N/R
Illinois	Clients call wanting to know how to get the compliance information they need. Although most of the compliance problems have been identified in the table above, we continue to hear, "It's great to have this program available to us, but we have land and water issues and problems as well." In IL, we are currently looking for resources to add first, a land person, as that seems to be a priority. Second would be a staff person for water compliance issues. The Director of our agency is in complete support of this expansion as are our private sector business groups. We would like US EPA for ideas and assistance to make this happen.
Indiana	Too many regulations to understand and/or keep up with without hiring a full time person. Cannot afford to hire anyone. Vendors sometimes give conflicting guidance. Businesses become confused as to whom to believe or trust.
Iowa	Most clients need to get New Source Review Permits (also known as construction permits). Many need assistance with 1) emission inventory development and applicability determination for Title V, NSPS, and NESHAP; and 2) responding to inquiries by the regulatory agencies.

N/R No response

TABLE G-1
(Continued)

PROGRAM	COMPLIANCE ISSUES
Kansas	N/R
Kentucky	None
Jefferson Cty	N/R
Louisiana	None
Maine	Common compliance problems across all businesses include hazardous waste violations, mainly due to lack of understanding of the regulatory requirements.
Maryland	Lack of information. Lack of paperwork (permits, recordkeeping).
Massachusetts	Compliance in several sectors involving large numbers of small, mostly uninspected companies, including printing, photo processing, dry cleaners, and now auto body refinishers, have been improved by collaborative work between the MA/DEP Business Compliance Unit and OTA's SBAP. Extensive outreach and compliance activities have occurred in these sectors, including workbooks, innovative compliance mechanisms, and in some cases, enhanced enforcement. Examples follow: *Printing* -- Formerly the subject of MA Printers Partnership, involved 435 companies in an innovative compliance program. Now, that sector is being rolled into the MA/Environmental Results Program (ERP), which will involve virtually all printers in the state (approximately 2,000). Project rollout in June 1998, withe certification required by 9/1/98. *Dry Cleaners* -- The first industry sector to be included in ERP, this involved virtually every perc-using dry cleaner in the state (approximately 1,300). At last report, about 850 dry cleaners had completed and submitted ERP self-certification packages. Follow-ups are being conducted with the remaining dry cleaners to learn why they did not file. In some cases, shops have dropped out of business, or shops have not completed items required under the "Return to Compliance Plan" submitted as part of their ERP and are being monitored. In certain cases, enforcement may be the end result. This coincides with OTA's EPA-funded "Compliance Technician Training Program," in which dry cleaning professionals, trained by EPA, DEP, and OTA staff, conduct non-regulatory "inspection/training visits" for dry cleaners and provide training on areas in which the dry cleaner is not in compliance. *Photo Processors* -- Also an ERP sector, similar situation and numerical results. *Auto Body* -- "CRASH Course for Compliance and P2" (CRASH = collision Repair Auto Shop Help) is now in the final stages of development. A multimedia workbook, including environmental, occupational safety and health, and municipal/state code requirements is in draft form. The workbook, along with workshops, clinics, and on-site assistance, will begin in September 1998. Regulations have not been revised as in ERP sectors, however, regulations have been put in a single, easy to understand workbook. Will provide significant help to an estimated 2,400 auto body shops.

N/R No response

TABLE G-1
(Continued)

PROGRAM	COMPLIANCE ISSUES
Michigan	MI continues to have a tremendous volume of governmental regulation that business must comply with on a day-to-day basis ranging from environmental (e.g., air, land, water, waste permitting, fire safety issues, etc.) to labor force issues (e.g., OSHA regulations). For some, it is overwhelming; there are not enough hours in the day to stay on top of all these requirements. The states' SBAPs should be or are synthesizing these regulations/requirements into more simple and understandable terms for such businesses. To address this issue, MI, like other states, is in the process of developing handbooks for specific industries (e.g., dry cleaners, auto body, etc.) that contain a comprehensive, yet simple, organization of the requirements. One compliance issue that seems to resurface constantly is where to find the right piece of pollution control equipment to achieve compliance with state or federal regulation.
Minnesota	Small businesses have difficulties with obtaining comprehensive multimedia environmental information both within the MPCA and from external sources including OSHA, ERC, and county governments.
Mississippi	N/R
Missouri	N/R
Montana	Many businesses ignore regulations and discard information from the SBAP. These businesses think that the regulations will never be enforced.
Nebraska	N/R
Nevada	Operating outside the parameters set in the permit: exceeding emissions limits, changing equipment without notice, removing controls, increasing number and types of equipment, etc.
New Hampshire	N/R
New Jersey	N/R
New Mexico	N/R

N/R No response

TABLE G-1
(Continued)

PROGRAM	COMPLIANCE ISSUES
New York	65% of the SBAP's calls are for regulatory information. Many of these are from consultants, who either cannot or will not obtain regulatory information from DEC. Another 16% of the calls are seeking permitting assistance. Typically, businesses are unaware of the regulations that apply to them, unable to comprehend the complex language of the regulations, and unable to understand the permitting process. These problems are prevalent across all industry sectors. An ongoing problem in the New York City Metropolitan Area is the need for permits from multiple agencies. Many firms have their New York City Department of Environmental Protection permit and believe that this is the only environmental permit they need. In other Metropolitan areas, the county also requires a permit. Permitting fees are high, as are the costs associated with filing a permit application, which, in many locations, must be stamped by a Professional Engineer. New York State's environmental permits require no such stamp, although many businesses use a PE to prepare their permit application. The layering of permitting requirements makes it difficult for the SBAP to provide assistance, since requirements vary so much by location.
North Carolina	The most common problem continues to be unpermitted facilities. Lack of knowledge or confusion about what needs a permit and the rules and requirements continue to affect small businesses, which generally lack time or expertise to identify points of emission, pollutants, and calculate emissions.
North Dakota	Regulations for small business must be written in the least technical language as possible for ease of understanding.
Ohio	The most common compliance problem has been lack of permits. Approximately 10% of those who received on-site assistance had permits. Lack of permits is the most common violation found by inspectors, and correcting this is the main focus of SBAP assistance efforts. Companies also report problems with understanding regulations, redundant reporting and recordkeeping requirements, and getting straight answers from the regulatory agency. Many companies also felt the OEPA could do more proactive outreach and educational activities or otherwise provide a single avenue for companies to get regulatory information. On-site visits to dry cleaners have shown that the majority of dry cleaners still do not have operating permits despite a 2-year period of informational mailings and outreach activities by OEPA.
Oklahoma	The major problem we encounter is a facility that is unpermitted for air emissions. However, we believe the Agency is working to move toward more common sense approaches to environmental regulations. Our Executive Director has charged each division to develop a categorical strategy for permitting sources based upon such criteria as numbers of sources in the state, potential environmental impact, etc. The philosophy is that as potential environmental impact increases, so should regulatory scrutiny. Conversely, as potential environmental impact decreases, regulatory scrutiny should decrease as well. Simplification of compliance issues for many facilities should be the result. Such a philosophy should benefit many small businesses in our state.
Oregon	Communicating with smaller companies is difficult, because many, if not a majority, of them do not belong to trade groups or have access to the Internet or other information resources. The daunting task of providing compliance and technical assistance services to the thousands of small businesses subject to NESHAPs and other environmental regulations is further hindered by educational language, and cultural barriers. SBAP has been somewhat successful at breaking through the fear barrier, but still needs to search out and implement innovative approaches that better fit the needs of the small business owner.

N/R No response

TABLE G-1
(Continued)

PROGRAM	COMPLIANCE ISSUES
Pennsylvania	Not just lack of financing for control equipment, but also to have performance tests done and to hire consultants to help them out of their mess.
Puerto Rico	Main compliance problem small businesses have is proper outreach from regulatory agencies and their suppliers or other sources of information.
Rhode Island	Lack of knowledge regarding the requirements of the air regulations generally results in violations of Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) limits.
South Carolina	N/R
South Dakota	N/R
Tennessee	Understanding what is required. Knowing who to call about environmental questions. Not getting needed permit updates (i.e., when business expands).
Texas	Printing and dry cleaning are largely solving their own problems. Low or no VOC inks, solvents and cleaning agents, automatic blanket washers, etc. in the printing industry and new, no-touch, no-feel dry cleaning systems that recover 99% of the solvent used in the cleaning process are examples. Our problem is accelerating the newer technologies into the low end, low tech part of the small business spectrum -- our "mom and pop" operations. The greatest compliance problem our office saw during this reporting period was *recordkeeping*. We see many businesses that either do not know they are required to keep any records or don't know what records they need to keep. For example, our contractor for site visits has told us that he is seeing a lack of documentation for hazardous waste determinations. We can also see a lack of hazardous waste recordkeeping by looking at the baseline numbers for the RCRA workshops. Additionally, through our hotline, we receive multiple inquiries each month from businesses that were not aware they needed to register for their exemption from permitting. Related to recordkeeping, we have also seen businesses that are not able to calculate/demonstrate compliance. We think some of this has to do with confusion about the terminology used in the regulations. To begin correcting the multiple problems within the general category of recordkeeping, we 1) Held a series of statewide RCRA Recordkeeping Workshops to teach businesses what records they need to keep and how to keep them. 2) Have worked with TNRCC's New Source Review Permitting Division to develop exemptions from permitting that allow businesses to use existing records to show compliance. For instance, we have worked to allow businesses to use purchase receipts to satisfy recordkeeping requirements. 3) Have worked with TNRCC's New Source Review Permitting Division to try to use business terms in exemptions from permitting. For example, using "gallons" instead of "pounds emitted." 4) Addressed recordkeeping during our workshops and in our printed guidance booklets.

N/R No response

TABLE G-1
(Continued)

PROGRAM	COMPLIANCE ISSUES
Utah	*Permit Streamlining Needs* – Many small businesses do not have the necessary air permits, known as Approval Orders, to discharge emissions into the ambient air. Businesses are either unaware of the requirements or lack the knowledge or terminology to understand permitting requirements, and therefore, do not obtain necessary permits. Some businesses choose to ignore the permitting requirements and feed that there is a slim chance that they will be involved in a compliance action. The new permitting de minimis for the Division of Air Quality serves to simplify and clarify the permitting requirements for small businesses. *Need for Multimedia Assistance* -- This issue has been identified by other state assistance providers at various forums, but its importance cannot be over-emphasized. In the course of providing technical assistance, the SBAP staff is requested to provide assistance on other regulatory requirements and issue beyond just air quality. Most businesses view the "single media" assistance as an incomplete service, since businesses need to address other environmental compliance issues. Many states have addressed the need for multimedia assistance by developing "one stop" regulatory assistance centers for businesses. In UT, the SBAP has established a working relationship with other Divisions to provide a more effective assistance package to businesses. Small businesses have benefited from that relationship by receiving assistance referrals through the SBAP to other Divisions in the Department of Environmental Quality.
Vermont	N/R
Virginia	N/R
Virgin Islands	N/R
Washington	N/R
West Virginia	One thing we can't give to our clients is TIME! They need time for us to explain the rules and they need time to comply with the rules. Anything that can reduce the time needed to do one or both of these will help.
Wisconsin	N/R
Wyoming	In general, there is a pervasive anxiety about having someone from the Department visit a small business for compliance assistance purposes, even if/when it is explained that we are there to help, not to penalize. Changing attitudes developed over years of negative experiences with regulators is our main challenge. We are making progress, but it is slow work and requires repeated contacts through a variety of different channels to get through. Our Outreach flyers, newsletters, display booth, and communications through trade associations, local Chambers of Commerce, and word of mouth from businesses we have helped all are starting to pay dividends. It will be years before the general public perception will welcome our help without reservation.

N/R No response

TABLE G-2
IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE

Program	More open communication between sources & regulatory agencies	Increased compliance	Greater understanding of regulations	Reduced apprehension/improved attitudes regarding compliance	Increased registration/permitting of existing sources	Improvements in P2 practices	Better recordkeeping	Other[a]
Alabama	N/R							
Alaska	X	X	X	X	X	X	X	X
Arizona	X		X	X	X	X	X	
Maricopa Cty		X	X	X	X	X		
Arkansas	X	X	X	X		X		
California	X	X	X	X	X	X	X	
Bay Area	X	X	X	X		X	X	
Kerns Cty	X	X	X	X				
Mojave Desert	X	X	X	X		X	X	
Monterey Bay	X	X	X	X			X	
Northern Sonoma Cty	N/R							
Sacramento	N/R							
San Joaquin	N/R							
San Luis Obispo	X	X	X	X		X		
Santa Barbara	N/R							
South Coast	X	X	X	X		X		
Tuolumne	N/R							
Ventura Cty	X	X	X		X		X	
Yolo-Solano								
Colorado	X	X	X	X	X	X	X	
Connecticut	X	X	X	X	X	X	X	

N/R No response

TABLE G-2
(Continued)

Program	More open communication between sources & regulatory agencies	Increased compliance	Greater understanding of regulations	Reduced apprehension/improved attitudes regarding compliance	Increased registration/permitting of existing sources	Improvements in P2 practices	Better recordkeeping	Other*
Delaware	X		X	X				
District of Columbia	X	X	X				X	
Florida*	X	X	X	X		X	X	
Georgia	X	X	X	X	X	X	X	
Hawaii	N/R							
Idaho	N/R							
Illinois	X	X	X	X	X	X	X	
Indiana	X	X	X	X	X	X	X	
Iowa		X	X	X	X		X	
Kansas	X	X	X	X			X	
Kentucky	X	X	X	X	X	X	X	
Jefferson Cty	X		X			X	X	
Louisiana	X	X	X	X	X	X	X	
Maine	X	X	X	X	X	X	X	
Maryland	X	X	X	X	X	X	X	
Massachusetts	X	X	X	X	X	X	X	
Michigan	X	X	X	X	X		X	
Minnesota	X	X	X	X	X	X	X	
Mississippi	X		X			X		
Missouri	X	X	X	X	X	X		
Montana	X	X	X		X	X		
Nebraska	X	X	X				X	

N/R No response

TABLE G-2
(Continued)

Program	More open communication between sources & regulatory agencies	Increased compliance	Greater understanding of regulations	Reduced apprehension/improved attitudes regarding compliance	Increased registration/permitting of existing sources	Improvements in P2 practices	Better recordkeeping	Other[a]
Nevada	X	X	X	X	X	X	X	
New Hampshire	X	X	X	X	X	X	X	
New Jersey	X	X	X	X	X	X	X	
New Mexico	X	X	X		X	X		
New York		X	X	X	X	X	X	
North Carolina	X	X		X		X		
North Dakota	X	X	X		X	X	X	
Ohio	X	X	X		X		X	
Oklahoma	X	X	X	X	X	X		
Oregon	X	X	X	X	X	X		X
Pennsylvania	X		X					
Puerto Rico	X	X	X	X		X	X	
Rhode Island	X	X		X	X		X	
South Carolina	X	X			X		X	
South Dakota	X		X					
Tennessee	X	X	X	X	X	X	X	
Texas	X	X	X	X	X	X	X	
Utah			X	X				
Vermont	X	X	X	X	X	X	X	
Virginia	X	X		X				
Virgin Islands	X	X	X	X	X	X	X	X
Washington	X	X	X	X	X	X	X	
West Virginia	X	X	X				X	

N/R No response

TABLE G-2
(Continued)

Program	More open communication between sources & regulatory agencies	Increased compliance	Greater understanding of regulations	Reduced apprehension/improved attitudes regarding compliance	Increased registration/permitting of existing sources	Improvements in P2 practices	Better recordkeeping	Other*
Wisconsin	X	X	X	X	X	X	X	
Wyoming			X	X		X	X	

*Other & Notes

AK Reduced pollution and product substitution.

FL In answering this question, we are using the dry cleaning segment of the small business community as a reference.

OR More requests for information.

N/R No response

TABLE G-2
(Continued)

PROGRAM RESPONSES

Programs were asked for information on the improvements in regulatory understanding and compliance. Individual program responses are listed below. Comments are edited for space.

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Alabama	N/R
Alaska	N/R
Arizona	N/R
Maricopa Cty	Associations refer members to us. Customers call for more information or other needs due to increased credibility.
Arkansas	N/R
California	N/R
Bay Area	Additional compliance assistance outreach includes: Industry Compliance Schools > Wood Products Coatings -- 3 classes/65 attendees > Printed Circuit Board Manufacturing -- 1 class/14 attendees > Coating & Solvent Vendors -- 3 classes/20 attendees > Perchloroethylene Dry Cleaning -- 3 classes/70 attendees > Graphic Arts & Printing Operations -- 3 classes/81 attendees Association Speaking Engagements > Autobody -- 2 > Dry Cleaning -- 1 Satellite Teleconferences > Wood Furniture Surface Coatings -- 1 > Green & Profitable Printing -- 1
Kerns Cty	Being fair-minded and reasonable in our approach does wonders to enhance communications and compliance.
Mojave Desert	The District twice hosted ARB training for operators of dry cleaning facilities. The District also hosted ARB training for operators of surface coating operations (metal parts and products and auto refinishing). Our compliance inspectors performed 2 courtesy inspections of all dry cleaners within the District. The District has promoted a better working relationship with industry while increasing awareness and understanding of the applicable regulations.

N/R No response

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Monterey Bay	N/R
Northern Sonoma Cty	N/R
Sacramento	N/R
San Joaquin	N/R
San Luis Obispo	N/R
Santa Barbara	N/R
South Coast	In a new business opinion survey conducted in 1997, we were alerted to the following compliance improvements: need for fee schedule amendments, streamlining of permitting process, and management need to periodically get involved with field activities.
Tuolumne	N/R
Ventura Cty	One of the most pro-active things that we have done is the concept of a "pre-application" meeting. If a business is identified as operating illegally without an air permit, they are *required* to come in for a meeting with a District permit engineer to discuss rule requirements and application forms. The subsequent permit application submitted by the business is of a higher quality, and compliance with rules is often achieved earlier.
Yolo-Solano	Cooperation, which results in better compliance. Working with sources to solve complex problems!
Colorado	N/R
Connecticut	CT is trying to do a better job in measuring behavioral changes as well as environmental improvements that result from providing compliance assistance.
Delaware	N/R
District of Columbia	N/R
Florida	N/R
Georgia	N/R
Hawaii	N/R

N/R No response

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Idaho	N/R
Illinois	IL companies are more open to an environmental checkup and are more conscious of the environment. Trust is a major accomplishment we have seen in the SBAP. Small businesses are like people -- we all have different comfort levels. Some companies feel comfortable working directly with a regulatory agency and some do not. In IL, working with IEPA Bureau of Air and Office of Small Business, companies have a choice. Through business/compliance assistance, we at the Department of Commerce and Community Affairs can offer all firms a choice. When that happens, we feel businesses have a greater trust in working with government to get compliance information.
Indiana	CTAP clearly has a good relationship with IN dry cleaners. We have built a good reputation with this industry. One of the results of this relationship is that dry cleaners we work with refer their colleagues to us for assistance. Through working with and developing a relationship with CTAP, the regulated community has become more willing to participate in voluntary programs and advisory groups, and to attend workshops. The regulated community also has demonstrated an increase in initiating contact with CTAP, either by calling for assistance or requesting on-site assistance.
Iowa	IAEAP continues to have a steady backlog (~250 site visits and 100 permits). Clients are provided assistance until they are in compliance or choose to remain out of compliance.
Kansas	N/R
Kentucky	None
Jefferson Cty	N/R
Louisiana	N/R
Maine	N/R
Maryland	MDE developed and widely distributed a guide to environmental permitting, regulations, and certifications in MD. This guide described the purpose of each permit, the necessary steps to receive a permit, and a contact name for assistance. Through MDE's web site, regulated facilities can learn more about MDE, our regulations, and permits.
Massachusetts	The outreach programs run jointly by DEP/OTA have not just sought an increase in compliance (because compliance is a "snapshot"), but an increase in understanding of the environmental issues involved in running their business. This goes beyond compliance to involve P2, occupational safety & health, and community issues. The goal is for the business to put in place practices and systems that will not only achieve compliance, but encourage the pursuit of environmental excellence as a means to achieve a competitive advantage. For smaller facilities, jointly-developed workbooks provide what is essentially an Environmental Management System (EMS), while for larger facilities, we often encourage formal development of such a systematic process.

N/R No response

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Michigan	It has taken a few years for MI's SBAP to establish a reputation as a provider of quality technical assistance services by both the staff at our air pollution control authority as well as business and industry. By comparing the steady increase in the number of services provided, the SBAP's level of services has increased by 49.6% between FY 1996 and 1997 -- more than double the increase from FY1995 to 1996. The increase in the number of repeat customers (via telephone consultations, workshop attendance, and publication requests) is especially realized in the areas of permitting and NESHAP compliance assistance.
Minnesota	Finding better recordkeeping due to SBTCP-developed log sheets and electronic spreadsheets provided to various business sectors. The "assistance" approach is getting a lot of praise from industry, resulting in a better and more environmentally productive industry/ government relationship.
Mississippi	N/R
Missouri	N/R
Montana	N/R
Nebraska	Businesses telling other businesses about the Assistance Program.
Nevada	It would be nice to have clear, easy to maintain performance indicators for this topic. Rating success of programs is a truly frustrating task. Standard surveys would be one of many potential answers to gathering impartial and valid data.
New Hampshire	Through our auto repair industry outreach efforts, we have identified at least 250 instances of non-compliance with a regulatory requirement, all of which have been or are in the process of being corrected. This only includes those non-compliance efforts identified through on-site assessments and not items self-discovered through the use of our compliance manual.
New Jersey	N/R
New Mexico	N/R

N/R No response

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
New York	SBO -- In 1997, the SBO noticed a new trend in the type of assistance being requested through the hotline. In the past, the hotline had been flooded with phone calls from people who were surprised to find that their businesses were subject to air quality regulations, and who needed assistance through the entire regulatory process. Now, it seems that most businesses contacting the SBO have a heightened awareness of the regulatory requirements. Most businesses have either already received a PROGRAM outreach mailing; attended an SBO-sponsored conference/workshop; received information through a trade association, industry magazine or newsletter; or received assistance from SBAP. As a result, most callers to the SBO already understand that the requirements pertain to them and generally need assistance negotiating with regulatory authorities, finding financing to comply with the regulations, or getting clarification on specific policy issues related to a regulation. As such, the SBO has been able to better focus its efforts on the policy and financial issues that create obstacles for small business regulatory compliance, thus helping to make small business compliance less difficult. SBAP -- During the last 9 months of 1997 (the period for which statistics are available), the SBAP prepared 46 Minor Facility Registrations and 8 State Facility Permit applications for small businesses in New York State. In addition, 230 (19%) of the 1,226 calls to the SBAP's hotline were from environmental attorneys and consultants, largely seeking regulatory and permitting information. Typically, these consultants were preparing permit applications for other small and large businesses in the state. If each consultant were to prepare only one permit or registration application using the information obtained by contacting the SBAP, then 284 permits and registrations were obtained through the assistance of the SBAP, either directly or indirectly. The fact that more than 80% of callers to the SBAP hotline are seeking regulatory and permitting assistance indicates the willingness of the small business community to comply with regulatory requirements, once they know of the regulations' existence and understand what they must do. It also reinforces the need for such an assistance program, since businesses are unable to obtain the information they need from other sources.
North Carolina	N/R
North Dakota	N/R
Ohio	More MACT standards need to include small business applicability or exemption criteria. For example, the wood finishing MACT included "exemption levels," which were based on material usages, not emissions. This approach is much easier for both companies and regulators to understand and work with. Many times, SBAPs focus on how small businesses can avoid permitting and reporting requirements (i.e., CESQGs, FESOPs, permit-by-rule exemptions) and some SBAPs have taken the lead to develop new exemptions for their state. These kind of efforts must be supported by US EPA. It is usually difficult for states to get these types of exemptions approved in a SIP. The US EPA-developed brochures and fact sheets on MACT standards have been helpful.
Oklahoma	N/R
Oregon	SBAP has experienced increasing success in creating awareness and improving the compliance status of many small businesses. For example, during 1997, 8 businesses applied for and received P2 tax credits. 38 small businesses received P2 assistance. Staff participated in 7 seminars that were attended by more than 300 small business owners or representatives of small businesses. Under the auspices of the SBAP, regional air quality staff visited 22 area NESHAP sources and provided compliance assistance.

N/R No response

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Pennsylvania	N/R
Puerto Rico	Many times, small businesses don't achieve compliance because of requirements from other agencies. This stops the small businesses from improving their operations and reaching their goals with P2.
Rhode Island	Overall outreach, communication, and availability of SBO, SBAP, and technical assistance outreach services continue to have a positive impact on behavior and environmental compliance.
South Carolina	In general, SBAP contact with small businesses reduces fear of regulatory agency and requirements. SC's program is located within the environmental regulatory agency. Having one name and phone number in a regulatory agency (that you can trust) helps tremendously in encouraging compliance and identification of sources.
South Dakota	N/R
Tennessee	Regulatory agency is now comfortable with us and frequently will make referrals. Businesses are accepting us as a confidential assistance program. Companies are responsive to our assistance efforts, which aids compliance.

N/R No response

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Texas	Through our work with specific industries, we were able to increase compliance in the following areas: Foundries > Baseline compliance -- air (52%) and waste (68%) > Ending compliance -- air (93%) and waste (75%) > Compliance increase -- air (41% increase) and waste (7% increase) Dry Cleaners > Baseline compliance -- air (69%) and waste (74%) > Ending compliance -- air (87%) and waste (92%) > Compliance increase -- air (18% increase) and waste (18% increase) Auto Body > Baseline compliance -- waste (83%) > Ending compliance -- waste (96%) > Compliance increase -- waste (13% increase) General Waste Issues (information from RCRA Recordkeeping Workshops): *Waste Determination* > Baseline compliance -- 78% > Ending compliance -- 92% > Compliance increase -- 14% increase *Recordkeeping* > Baseline compliance -- 61% > Ending compliance -- 84% > Compliance increase -- 23% increase *Proper Accumulation* > Baseline compliance -- 77% > Ending compliance -- 93% > Compliance increase -- 16% increase *Proper Disposal* > Baseline compliance -- 86% > Ending compliance -- 98% > Compliance increase -- 12% increase From the baseline numbers indicated above as well as initial feedback from our site assistance contractor, it seems that many businesses have managed to achieve some level of environmental compliance. Further, the responses from callers and from questions at workshops indicate an improving level of knowledge. Assistance is requested concerning applications of various parts of the rules rather than, "rules, what rules?" questions.

N/R No response

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Utah	N/R
Vermont	N/R
Virginia	There is a strong relationship of compliance assistance activity to the awareness and acceptance by the existing regulated or newly regulated community. As a result of our joint activity with OECA and the development of the "Partners in Perc" mentoring program for Korean dry cleaners in MD, DC, and Northern VA, we continued to see that regulatory information provided in understandable formats, either written or through a combination of materials and peer coaching, that compliance progress can continue. We are finding that a large part of the success of any outreach assistance is a continued interest in and delivery of a non-regulatory assistance message to the affected source population. This includes concise, understandable materials, a recognition of the minimal available time for a source to participate in outside activities beyond his daily business, and the provision of options for compliance. All these are critical to the success of a compliance assistance effort. Compliance assistance activity will not necessarily yield verifiable results immediately. *Compliance assistance activity should be viewed as a system, a support system, that will yield incremental results arriving at full compliance.*
Virgin Islands	N/R
Washington	N/R
West Virginia	Improved awareness by small businesses results from almost every contact (e.g., phone, brochure, on-site audit, etc.). Also, teleconferences, training, and all outreach activities result in improved awareness of the environmental responsibility by small businesses. For example, all the dry cleaners in WV have been contacted many times. All are aware of the changes in operation and equipment required, and the majority are now in compliance. However, we have noticed that it takes multiple assistance efforts reinforced by enforcement inspections to achieve good results.
Wisconsin	N/R
Wyoming	Our program is just getting well enough established that we are getting phone calls requesting assistance. Our coordinated function hasn't been in place long enough to really demonstrate the kind of results we hope to see in the long term. The most visible early positive indications are reflected in selected P2 initiatives being implemented as a result of several outreach classes presented last fall. There are also a few instances in which businesses have approached us asking for information on permitting and compliance issues. We can only assume at this point that the information provided is being used to its full benefit. We plan on conducting customer surveys in 1998 to gather more information on how our efforts are affecting actual compliance and P2 performance.

N/R No response

TABLE G-3
RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Alabama	N/R
Alaska	On the state level, there is still potential problems with charging an hourly fee to small businesses. However, the air program is considering changing this when they re-evaluate the overall fees of the program. On an EPA regional level, the requirements imposed to show compliance would require sources to install CEMs and COMs on equipment. This may change in the future as first permits by the state are just getting vetoed by EPA.
Arizona	Help in establishing grant or low interest rate loans for environmental compliance.
Maricopa Cty	National environmental education public service announcement for business (ex. Post Office lets customers know they are there.). National environmental television show for consumers and businesses related to P2. National compliance school that runs like traffic school (each region). Model idea: National Environmental Training Institute (NETI) -- This could be a great voluntary option to send employers for 2 days of training. Funding could come from leveraging fines, SEP, or taking money from regional grant appropriations. Once location in each EPA region. One year demonstration.
Arkansas	Small businesses need assistance in all media areas, not just air quality issues. Would like to see more technologies in P2 circulated and explained in simple language.
California	Given the diversity is size and programs in CA and its air districts, it is important to recognize the high value to small business to have a flexible, non-prescriptive implementation of the federal CAA.
Kerns Cty	This EPA should be more down-to-earth.
South Coast	N/R
Colorado	N/R

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Connecticut	*Provide a mechanism to credit state efforts and resources invested in 507 programs* -- Since most states have extremely limited resources, investments in proactive compliance assistance efforts should be credited towards efforts to achieve emission reductions. SIP credits would provide one such mechanism, as would the performance partnership agreements negotiated between the states and EPA. *Simplify and consolidate federal requirements* -- The complexity of some of the federal MACT standards CTGs will provide to be incomprehensible to most small businesses. In this area, in particular, there are so many requirements that apply on top of other existing federal and state requirements, it will be virtually impossible for small businesses to comply with all of them. *Coordination of technical assistance providers* -- The coordination of technical assistance should be a priority on the federal level. Isolated grants through EPA, SBA, NIST, and DOC have resulted in the proliferation of state technical assistance providers. In some cases, this has increased confusion for small businesses and has led to redundant functions for TAPs. *Enforcement* -- States and small businesses need support with compliance assurance and measuring compliance. EPA regional offices (Enforcement and the Regional Counsels) need to look broadly at compliance measures and avoid narrowly-defined measures to evaluate state enforcement programs. State SBAPs have implemented many innovative programs that have enhanced compliance. Measures should be based on a variety of indicators that are much broader than number of referrals, amount of penalty, etc. These measures could include emission reductions, permit requirements avoided, and P2 measures implemented.
Delaware	I suggest a more common sense approach to environmental regulatory compliance. Quite simply, if the actions required and dollars invested by a small business to achieve compliance cannot be directly related to protecting the air, water, or land, then we should not ask them to spend the time or money. The large majority of businesses I come in contact with truly want to do the right thing when it comes to protecting the environment, but when compliance amounts to nothing more than filling out another pile of meaningless paperwork, cooperation from small business is, justifiably hard to come by.
District of Columbia	N/R
Florida	At the state level, when a new business applies for a tax identification number, the new business owner should be issued a booklet that provides information on the regulatory agencies whose regulations may be applicable. Support legislation for grant programs for small businesses to help them achieve environmental compliance.
Georgia	I would recommend that all 507 programs become multimedia. This could possibly eliminate the duplication of services by the various programs that are springing up to fill the void in the 507 programs. I also would relax the definition of a small business to include all sources with less than 100 employees regardless of the amount of emissions.
Hawaii	None

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Idaho	Pass S1957. Clarify what EPA intends to do. There have been mixed messages sent to the regulated community.
Illinois	Simplify the paperwork wherever possible. Remove the fear factor. Increase the ability of small businesses to participate in the regulatory development process. Provide more lead time and notification when compliance dates will take effect. Expand SBAPs to be able to provide multimedia assistance. Build on the success, trust, and reputations of our existing programs.
Indiana	Continue to provide funding to states so that they can effectively implement their SBAP programs and assist the regulated community. Beyond continuing funding at the previous levels, increase funding so that the programs can move towards becoming multimedia. This move towards multimedia is a natural progression. As the regulated community becomes aware of and builds a good relationship with its SBAP, requests for assistance not only increase, but become more broad-based. If the SBAPs cannot more towards becoming multimedia, the only option for the regulated community is to seek assistance through the regulatory programs or hire a consultant. The regulated community often is extremely hesitant, if not unwilling, to work with the regulatory programs. For many small businesses, the cost of hiring a consultant is not feasible.
Iowa	Support SBAP efforts to expand and improve technical assistance by ensuring adequate funding. Expand communication between state and federal agencies to address environmental issues from a small business perspective. Facilitate and encourage networking of assistance providers and avoid duplication.
Kansas	N/R
Kentucky	Federal program stability. Procedures that allow states flexibility to use non-traditional methods of bringing small businesses into compliance. Recognition that concepts like "potential to emit" may require modification when applied to categories of small businesses. Awareness that a detailed paperwork system to prove that a permit is not necessary is inefficient.
Jefferson Cty	Very small business owners do not see themselves as part of the "regulated community." They see themselves as "citizenry" who are self-employed or who own a small shop. They may not take the time to be involved in a trade association or read industry trade journals. Therefore, the best way to reach them is to inform them of their obligations for air pollution control is to reach them as citizens. The regulations and standards of the CAA need to be more visible to the common man and be given a higher profile. Use TV ads, billboards, radio spots, etc. to raise awareness of air pollution issues and what they mean to the ordinary person.
Louisiana	We in LA are doing everything to assist the small businesses to comply with the CAA. We must think beyond assisting the small business if we are to relieve them of the non-environmental aspects of compliance. We must consider a less burdensome method of reducing emissions. A working session, "Rethinking Regulating Small Business," will be conducted at the 1998 SBO/SBAP national conference. We are hopeful that this session will produce some practical ideas that we can share with EPA.
Maine	Include incentives for P2 in all new rules.

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Maryland	N/R
Massachusetts	*Demonstration of good faith* -- As indicated in last year's SBAP report, there should be a clear, concise, and easily-explained "good faith" policy that businesses could use. The OECA "Small Business Compliance Incentive" policy is a huge step in the right direction, but due to complexities and disclaimers, the policy has not been as widely used as any of us would wish. An unequivocal policy should essentially state that no penalties will be assessed if the business is acting in good faith, working with a compliance assistance unit, and the violation is not egregious. *Standard for MSDS* -- Create regulations governing and creating a standard for MSDS provided by suppliers. This document is the basis of all technical information (recordkeeping, reports, permit applications, etc.) Required of businesses, and the MSDS vary widely in their content, technical accuracy, and forthrightness. In addition, they deal primarily with safety and health issues, as required by OSHA regulation, which mandates them in the first place. They frequently fail to provide full essential information about air issues, including VOCs, HAPs, spill management, or waste disposal (typically say, "manage in accordance with state and federal law"). For the last dozen years, OSHA has made efforts to standardize the approach and content of MSDS, but has not been able to accomplish this. The importance of this effort requires that the more sweeping scope of EPA's authority be involved in the solution. *Formalization of joint SBAP program* -- To be consistent with both agencies' programs, the SBAP must be multimedia. As suggested above, the Small Business Compliance Incentive policy could be employed by OTA to allow businesses the option of remaining fully confidential, or by using OTA report letters, self-report the non-compliance to DEQ and gain the compliance window to implement corrections.
Michigan	Provide grants or low interest loans (under the administration of the SBTCPs only) for small and medium-sized businesses for access to design engineers for modification of current facility processes and control equipment to reduce air emissions. Provide more grant money to state SBTCPs to develop and use innovative ways for distribution of environmental program content and services to various industry sectors; a type of "back door" approach to outreach and education for the small business workforce. For example, a federal or state grant would allow an SBTCP to work with federal and state government as well as business, industry, and statewide educational institutions to coordinate and package environmental compliance and P2 information that is specific to industry sectors. The information would be introduced to students at the secondary or post-secondary level, so that by the time the student enters the workforce, he/she will bring timely, relevant, and useful knowledge and experience to specific industries or businesses.

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Minnesota	Reevaluate the need for monthly recordkeeping for registration permit holders. The requirement is burdensome and doesn't make sense to small businesses. In addition, it results in little, if any, environmental benefits. Small businesses (and others) are much more apt to comply with regulations if they make sense and are meaningful. Small businesses would find it helpful if EPA took a commanding role in developing SBTCPs into multimedia programs. This already is occurring naturally, however slowly, due to a demand from small businesses. Federal assistance from EPA would accelerate this evolution into multimedia program formats. Create or provide funding for financial assistance programs to help pay for or help finance environmental improvement projects. "One size fits all" regulations do not work well for small businesses. Need to continue looking at more size exemptions and identifying and recognizing "insignificant activities." Outreach and education result in more environmental benefits than complex rules and permitting.
Mississippi	N/R
Missouri	N/R
Montana	At the state level, I would caution against locating an SBO/SBAP within a regulatory agency, even if it is located in a nonregulatory function of that agency. Even indirect association with the regulatory functions discredits the efforts of the SBO/SBAP in trying to work with suspicious small business owners. At the federal, provide more funding options for SBO/SBAPs to tap into for loan/grant programs. Help all SBO/SBAPs to offer multimedia compliance assistance. Small businesses benefit from multimedia assistance rather than media-specific.
Nebraska	N/R

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Nevada	A brief and easily understood brochure would be helpful, specifically one targeting small businesses with an explanation of the CAA. Such a guide would be along the lines of the "Must for USTs" issued by EPA and the fact sheets and streamlined implementation flyers also related to that program. A web site that has a brief description of the policies regarding the CAA as they are developed; a site that is integrated, allowing for easy searches on topics. An up-to-date regulatory compliance schedule for the CAA rather than a list of contact personnel. A more durable system of funding environmental small business assistance. The method of funding has been a hodgepodge of revenue sources. Effective technical assistance requires a long planning, implementation, and development period. Operating hand to mouth means that a viable and comprehensive system of technical services will take much longer to develop. At the federal level, the small business compliance assistance policy is virtually worthless. It is far too cumbersome to use, having endless requirements just to get through the door to access the policy. It needs to be simplified and designed for small businesses. The officials in the regions need to work within the spirit of the policy and embrace a perspective of flexibility, a can-do approach, rather than trying to find any flimsy reason to ignore the policy and beat up on the small business owner, because he is an easy and vulnerable target. Policies need to be developed and implemented that grant small businesses consideration when found in non-compliance. This may seem unfair when compared to larger businesses, however, small businesses cannot afford attorneys or consultants for advice as their larger counterparts. Nor can they afford fines in addition to obtaining permits and perhaps updating equipment. One consideration would be to set a probationary period when fines and penalties would be waived for a specified time during which the small business could prove their intent to remain in compliance. If the small business can maintain compliance within the specified time frame, all fines and penalties would be dropped. A portion of the probationary period provisions could be to participate in outreach to other small businesses. SBAPs and SBOs across the nation agree that one of the biggest hurdles for state programs is educating permitting and enforcement staff as to the services we can provide and to overcome any perception that the SBAP is trying to interfere with or override their regulatory programs. This is apparent on the federal level also. Regional EPA offices and the divisions within are not well informed as their own SBTCP nor the Headquarters office and the network of assistance available for small businesses. Regional SBTCP staff should make a semi-annual attempt to network with state SBAPs to identify regional small business needs and to coordinate federal and state assistance, including networking with permitting and enforcement staff. The disconnection on the regional level has proven to be counterproductive to development of a strong regional approach to environmental compliance assistance. Overall, the area of environmental compliance is innovative, but highly fragmented, with the many parts rarely working together.

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
New Hampshire	Continue efforts to expand 507 programs to full multimedia with stable funding. Expand efforts to empower ombudsmen to represent all environmental compliance activities at the state and national levels. Levels of expertise and the ability to offer compliance incentives are unrivaled in any other delivery mechanism and should be expanded to ensure environmental compliance with regulatory requirements; protection from enforcement actions should be given to businesses who want to comply, but do not know how.
New Jersey	More funding/staffing -- EPA either needs to provide funds to states or stress the importance of SBAP/SBO programs to the Governors of those states whose programs are obviously lacking in funding or staffing. EPA must establish a consistent reporting form so that states know the type and form of the information that will be requested in these annual reports so that the states can gather this information in the appropriate format.
New Mexico	N/R
New York	Formalize technical and compliance information outreach to environmental consultants. 19% of the calls to the SBO hotline and 10% of the calls to the SBO come from attorneys/consultants. Frequently, the consultant already has called the state regulatory agency for information and was referred to the SBAP. Providing information to consultants eventually helps the small businesses, but it is not part of the SBTCPs mandate and can take time away from direct contact between the SBTCP and the small businesses. All states should be required to implement a program to train consultants to keep them informed of regulatory changes. If informing consultants is to be part of the SBTCP's responsibilities, let that responsibility be formalized and defined so that SBTCPs can take a proactive approach in providing outreach to consultants. Improve small businesses' access to funding to purchase equipment necessary to achieve compliance. Presently, small businesses have difficulty obtaining financing for environmental compliance projects and appear to be unable to obtain loans from traditional funding sources if they are out of compliance with regulations. Government support could include capitalizing state or federal revolving loan program, establishing matching grant programs, or enhancing the SBA's ability to provide grants/loans to small businesses in order to come into compliance.
North Carolina	Continue to work on changing the definition of "potential to emit" to reflect a reasonable estimate of "actual potential emissions." Modify EPA policy of "once in, always in" to allow major MACT sources to voluntarily reduce emissions below major thresholds, become small, "non-major" sources and receive benefits for reductions, reduced recordkeeping, and reporting. Continue initiative for a multimedia environmental assistance program. Small businesses expect assistance on all regulations affecting them. They do not understand why there are 4 or 5 agencies dealing with the environment for a single chemical.

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
North Dakota	Ensure that any federal compliance assistance centers do not duplicate the efforts of the state SBTCPs, which would be a waste of taxpayer money. Any federal compliance assistance centers established need to keep the state SBTCPs informed of their capabilities and materials upon which the SBTCPs can capitalize. Small businesses are more likely to request state or local assistance before federal assistance. Allow states flexibility in administering rules and policy they adopt, which are intended to assist small business (e.g., different versions of amnesty that result in compliance).
Ohio	There is still a serious problem in that the regulatory structure is designed to be used and understood by larger entities. Small businesses will never have the resources to decode regulatory language, search out proper technology, find financing and implement it all while keeping the business operational. Among the steps that could help: > Regulatory language written specifically for the small business source; clear language, explanation of terms and concise examples of applicability. > Enforcement policies designed to recognize that many small business violations are paperwork related. If a consistent pattern of these technical violations is documented, the rules need to be changed. > Both state and federal levels need to direct more assistance resources to small business sources. At the state level, it appears that extremely tight budgets do not allow current resources to be used effectively for that purpose at the necessary scale. Federal legislation directing assistance to small business should be accompanied by the funds to support the effort.
Oklahoma	Continue to allow states an increasing amount of flexibility to design and implement their own strategies for permitting. This helps us, as we continually seek ways to help the small business community through the design of comprehensive and philosophically sound approaches to environmental regulation.
Oregon	*Financial* -- Develop a national policy that allows small businesses to invest in P2 technologies. Institute a revolving fund to finance small business technology conversions. Fund small business R&D projects with emphasis on P2. Increase grant funding to SBAPs. *Regulatory* -- Reward P2 by abolishing the "once in, always in" policy. Adopt realistic potential to emit criteria for small businesses. Adopt simple, less costly testing procedures for very small area NESHAP businesses. *SBAP Support Projects* -- Develop an easy-to-use national technical assistance tracking and reporting database. Develop a national small business mentorship program. Develop a national cross-media P2 green sticker recognition program. Develop a national simplified ISO 14000 plan for small business. *Training* -- Offer 1- to 2-hour teleconferences for all area source NESHAP regulations. Develop 30-minute training videos with workbooks for small business sectors. Offer teleconferences on cross-media P2 and environmental auditing. Offer a national training teleconference for environmental consultants serving small businesses.

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Pennsylvania	CAP training/network sessions are important for all involved -- fund these annually for all CAP Chairs. Outreach is of utmost importance; recommend a dedicated outreach effort (person?) as part of each CAP. Keep the Section 507 CAP mandate known to the CAP, so focus is maintained. More interaction with Program, SBO, CAP, and businesses affected by CAA -- find out if CAP/SBO activities make a difference by visitation/seminar networking.
Puerto Rico	The best recommendations should come from the regulated community. Their opinion is very important and the state and federal government will listen to them, too.
Rhode Island	All federal materials should include 1-page, simple-to-read fact sheets for the benefit of both the states and industry. Utilize electronic media wherever possible. Get materials out to national industry associations in a timely manner and in a format practical for regional industry association distribution.
South Carolina	Make all SBAPs multimedia.
South Dakota	EPA should step up their efforts in helping states identify sources or categories of sources that will be affected by maximum achievable control technology standards. EPA should discontinue the policy of "once in, always in." It does nothing but hamper efforts to get facilities to reduce toxic emissions.
Tennessee	Federal financial support for 507 programs.
Texas	Write rules in plain language. Make compliance conditions, like recordkeeping and reporting, easier by using common business terms (i.e., gallons used instead of pounds/hour or gallons generated for hazardous waste). Make all SBAP assistance at the state and federal level multimedia and back it up with funds for the program. Write exemptions for small businesses into all rules; use a stair step approach where controls increase as size and production increase. Amnesty seemed to be a good and logical balance between enforcement and assistance. Small businesses seldom have the savvy or resource, even if the inclination exists -- which it often does -- to finance and implement changes or improvement for environmental reasons. Simplification of rules followed by concentrated education with credible enforcement action to follow is a good formula. Make low cost loans available.

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Utah	*Financial Assistance for Compliance* -- Although the establishment of SBTCPs provides technical support to small businesses, many small businesses continue to lack the financial resources for pollution control equipment or P2 methods. The creation of financial compliance assistance, such as low interest revolving loan programs, would greatly enhance CAA compliance and SBTCP services. *Multimedia Support & Coordination* -- Many small businesses that seek SBTCP assistance request cross-media support and assistance. The SBAP receives numerous requests from small businesses to establish a "one-stop" regulatory assistance center. *Environmental Assessment Training Opportunities* -- Industry-specific training sessions that provide a step-by-step approach to conducting on-site environmental assessments, including P2 assessments, would be of great benefit to SBAP staff. *Exemption from Title V Permitting Requirements for Area Sources* -- Upcoming Title V permitting requirements will create an additional layer of paperwork requirements for area sources without significant environmental benefits. Any necessary monitoring, emission standards, and recordkeeping requirements can be administered effectively through state New Source Review programs. At this time, areas have been temporarily deferred from the permitting requirements. *Publicity* -- National public service announcements and a toll-free national hotline would be beneficial promoting SBAP/SBO services. Small businesses then could be referred to states for local support and technical assistance. *Sales Tax Exemption* -- The state should provide sales tax exemptions for P2 equipment and replacement parts.
Vermont	Due to reduced state budget, monetary support from the federal level would be appreciated. It was my understanding that EPA was getting away from the "bean counting." This questionnaire certainly does not support that.

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Virginia	**More comprehensive economic impact analysis of regulations affecting small businesses. Is the gain in emission reduction worth the price that will have to be paid?** Continued emphasis and increased activity on the part of EPA in reaching full program integration with all their rule-makings. Lay understandability should be an indispensable hallmark of all regulations prior to promulgation. Provision of revolving loan fund seed money by the SBA for small business compliance activities. Expansion of SBAP programs into multimedia with appropriate funding provided by EPA for inclusion of other media (water, waste). The Compliance Advisory Board, concerned about the impacts of compliance and enforcement activities on the small businesses of the Commonwealth, has produced a position paper entitled, "Commonwealth of Virginia Position Paper by the Small Business Environmental Compliance Advisory Board," which they are presenting to the Department of Environmental Quality. The Board also feels that their recommendations have potential merit for EPA. It is reproduced below in its entirety. *The Small Business Environmental Compliance Advisory Board, hereafter referred to as the Compliance Advisory Board or CAB, would like to make the following recommendation to the Department of Environmental Quality (DEQ):* *The Compliance Advisory Board feels strongly that it is in the best interests of the Commonwealth and the universe of small businesses impacted by Clean Air Act and Virginia's Air Regulations for the Department of Environmental Quality to optimize its compliance and enforcement activities by strongly encouraging the use of compliance assistance activities to obtain compliance. EPA has recognized the need for diversion from the traditional punitive means of compliance and enforcement when possible as evidenced by their creation of several policies such as the "Final Policy on Compliance Incentives for Small Businesses" (effective June 10, 1996), and "The Enforcement Response Policy for the Treatment of Information Obtained Through State Section 507 Small Business Assistance Programs Under the 1990 Clean Air Act Amendments" (effective August 12, 1994 and adopted as guidance by DEQ in 1995). We respectfully feel that the strict use of the "stick" is outdated and that more can be accomplished by extending the proverbial "carrot." As a part of this recommendation, we would like to encourage the use of, or consideration of the following tools:* *1. Resources budgeted for Virginia's compliance and enforcement program should provide monies and personnel resources to the Small Business Assistance Program to conduct voluntary compliance assessments for small businesses.* *Rationale: Small businesses are usually non-compliant because of a lack of regulatory knowledge and financial resources. Assistance in determining possible non-compliance situations can provide an exceptionally strong base upon which to build and obtain compliance.*

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Virginia (cont.)	2. *The use of amnesty programs to address non-compliance issues within a source category would provide a higher return on the expenditure of compliance resources to potentially obtain compliance of more than a source at a time.* *Rationale: Other states have used this voluntary compliance offer to bring firms into compliance. The CAB would be ready to assist the agency in securing information from other states which have embarked on amnesty programs.* 3. *Develop a policy that would encourage and routinely allow agency compliance officers to assist small businesses with compliance assessments to make on-site correction of deficiencies or the ability to make referrals to the SBAP when calling on small businesses for the first time.* *Rationale: The provision of compliance assistance without punitive measures to obtain compliance for the first-time offenders through the ability to provide on-site correction of deficiencies or make a referral to the SBAP would save agency resources through the reduction of activity necessary to normally provide traditional enforcement protocols.* *The above is respectfully submitted for review and consideration. We are available and would be interested in exchanging viewpoints to foster an on-going effort and relationship to achieve the best results for Virginia's environment and her small businesses.* *Our interest and recommendation arises from our charter. The CAB has, as a part of its legislated mandate under both federal and state statutes, the responsibility to "render advisory opinions concerning...the degree and severity of enforcement." As we have become more educated in the parameters of air pollution control and the impacts on the small business community, it has come to our attention that there may be a disparate utilization of resources for compliance and enforcement, from a traditional perspective, that may not recognize the physical pollution contribution of small business sources to the overall ambient air quality in the Commonwealth.* *We are of the opinion that, to the best of our knowledge at this time, approximately 90% of the air pollution is provided by an approximate 10% of potential emitting sources, the majority of which are large businesses (major sources). Our interest is that the application of enforcement resources be placed where they can be most effective in controlling non-compliance situations of the majority of the major emitters.* *The corresponding use of compliance assistance activity to address the contribution by the small business universe would seem to make sense. For example, we have seen that the use of compliance assistance to bring the dry cleaning community into compliance with the federal dry cleaning standard had the ability to reach farther than individual inspections ever could to ensure initial compliance.*
Virgin Islands	Continued training for SBO/SBTAP and all staff employees.

N/R No response

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA
Washington	Write more readable and understandable regulations. Reduce recordkeeping and reporting requirements for small businesses. More training would be helpful. More industry-specific information. Low interest loans or grants for new air pollution control equipment. Grant and loan directory. Funding for business assistance personnel.
West Virginia	Enact federal legislation that requires the states to promulgate an effective "self audit" program for small businesses. The state of WV, and the federal front if necessary, should enact legislation that authorizes the SBO to function as a multimedia ombudsman. Federal legislation should be enacted that allows SBREFA to apply to federal programs that have been delegated to the states. One panel member expressed serious concerns about EPA's avoidance of SBREFA-related assessment for small business impacts from several recent regulatory actions (e.g., ozone and PM NAAQS, proposed Ozone Transport Rule, etc.).
Wisconsin	N/R
Wyoming	Set aside some targeted grant funding to help small businesses that want to implement P2 or other compliance-related programs but can't afford the up-front costs. Establish with WESTAR an organization for CAPs that will provide an informational network on major regional issues.

N/R No response

TABLE G-4
CONFLICT OF INTEREST/CONFIDENTIALITY ISSUES

The SBTCPs provided information as to how their programs address internal or external conflicts of interest (COI) or perception that this program may not be confidential.

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Alabama	N/R
Alaska	Under AK law, all files and information retained by the SBAP and SBO are open to public review. The only exception is information that is traditionally recognized as confidential (e.g., attorney-client, ongoing enforcement-sensitive, or personnel records). Since the SBAP/SBO is non-enforcement, it does not use any of the attorney-client or enforcement privileges. Personnel records are not relevant to the businesses we assist. The SBAP/SBO has an on-going dialogue with the Department's Air Quality Section. There is an informal agreement that the Air Quality Program will not review the SBAP/SBO files. The Air Quality Program agrees that any violation of air quality regulations need to be discovered and documented by an Air Quality Inspector. This approach is explained to the businesses that request assistance by the SBAP. In addition, the SBAP is in a separate division of the Department, which is in a non-enforcement branch. The SBAP/SBO does provide technical information to sources that call in and do not identify themselves. Also, through the state web pages, businesses are able to obtain information anonymously. To date, there have not been any problems with the other sections of the department requesting to see our files. Also, there have been no requests from the public requesting to view or copy the SBAP files on businesses we have helped.
Arizona	Existing policies, strong support from the ADEQ Director, and good working relationships with the programs have done a great deal to maintain our credibility as a source of assistance that can be used without risk of exposure.
Maricopa Cty	To date, we have not had any problems with a company not complying due to confidentiality concerns. The biggest problem is internal conflict of interest -- at what stage does a company lose its "protective shield" from enforcement for not coming into compliance (soon enough or at all).
Arkansas	N/R
California	The ombudsman's office is part of the Air Resources Board Chairman's Office and no COI or confidentiality issues have arisen yet.
Kerns Cty	No problems.

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
South Coast	*Internal Conflict of Interest* -- From the time that the small business program was created, there has been an operating agreement with our compliance programs. This agreement specifies the different mission and operating procedures for the small business program. The agreement is being modified this year and will be followed by additional staff training. Conflicts rarely arise. *External Conflict of Interest/Questions of Confidentiality* -- Some businesses that contact our program for assistance ask for a confirmation/reassurance of confidentiality. Our staff, when scheduling technical consultations, remind each business that compliance information is never shared with other programs. Some businesses request anonymity for our records, and we try to accommodate the request in less complex cases.
Colorado	N/R
Connecticut	CT's SBAP does not offer confidentiality, the state's Freedom of Information Act is extremely broad and efforts to limit access to information have not been supported within the Department. Referrals are made to other entities that offer confidentiality; also situations that would require a confidential relationship are avoided.
Delaware	Since our program essentially is removed from the Divisions that are structured to be highly regulatory and enforcement-oriented, we are able to operate our SBAP with a rather high degree of confidentiality. The ombudsman assures clients that conversations with him concerning regulatory requirements are held in confidence until such time as a decision is made to either pursue compliance and contact the appropriate Division personnel or to re-evaluate the various options. This decision is made by the client. One exception to our assurance of confidentiality would be if our SBAP is made aware of a situation that poses an imminent threat to human health or the environment. If this should occur, we will immediately report this situation to the proper regulatory program within DNREC. Fortunately, we have not yet had to deal with this scenario.
District of Columbia	The SBAP is a permit engineer who may recommend enforcement actions for noncompliance. We work with our enforcement and compliance inspectors to refer small, noncompliant sources to us as an alternative to fines.
Florida	When a business seeks information through the SBAP, the SBAP acts as the business's consultant and liaison. A caller need not disclose his/her identity to obtain assistance. However, if the caller chooses to identify him or herself, the business's identification is not given to others outside the program. The SBAP is a non-regulatory program and is not involved with active enforcement cases.
Georgia	SBAP avoids the discussion of confidential material with compliance enforcement personnel. When discussions are unavoidable, the business names are not used, or circumstances are presented and assurances are secured before any sensitive materials are discussed.
Hawaii	No comments.

N/A Not applicable N/R No response

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Idaho	This hasn't been a big problem for us (at least it hasn't been expressed). The agency, as a whole, is working on showing businesses that we are there to assist them in compliance. We are taking a more proactive approach to problem solving. Confidentiality isn't something we have tried to maintain. We are more concerned with trust so we don't guarantee something that we can't.
Illinois	We keep clients' identifying information in a private database that the regulatory agency cannot access. Our organizational location of the SBAP is our main approach to avoiding the conflicts of interest. The SBAP is located in the IL Department of Commerce and Community Affairs (ILDCCA), the lead economic development agency for the state. We are within the Small Business Division, which is the lead Center in the Small Business Development Network. Small businesses know they can get free, confidential assistance through the 53 local centers and our statewide toll-free Helpline. The SBAP has as an interagency agreement with the IL EPA, Bureau of Air. We work very closely and obtain compliance information from them and facilitate the educational process with the small business community. If financing, accounting or any other small business need arises, they are already in the SBDC network to address those needs as well as environmental and CAA compliance assistance. We market, promote, and advertise our services as being nonregulatory and confidential to the enforcement agency. Thanks to the IEPA Bureau of Air, we have not had one client experience a problem in working through the SBAP. Our clients get assistance, not enforcement, and the IEPA gets more companies into compliance. This also helps the enforcement section at IEPA to reduce the noncompliance on which they are trying to improve. The partnership between IEPA and DCCA makes the SBAP work for small businesses in IL.

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Indiana	IDEM's Compliance and Technical Assistance Program (CTAP) is covered by statute (IC 13-28-3-4) mandating that, "...inquiries made to the program and activities and documents of the program that identify or describe as an individual facility or operation are confidential, unless a clear and immediate danger to the public health or environment exists." In addition, as an expansion of that policy, in the form of a Nonrule Policy Document, was published in the December 1, 1996 IN Register, offering additional guidance on how the statute would be followed. Both the statute and Nonrule Policy Document are available on IDEM's respective web sites: www.ai.org/idem/ctap/confidential.html and www.ai.org/idem/ctap/guidance.html. To further clarify and strengthen CTAP's confidentiality mandate, a written Confidentiality Procedures document was published, and all CTAP employees were trained in these procedures. In addition, each employee must sign a statement agreeing to keep CTAP Confidential Information confidential. The signed form then becomes part of the employee's file. Since CTAP is part of IDEM, the CTAP office is off limits to the public and non-CTAP staff, including other IDEM personnel. This is accomplished through physical separation from the rest of the agency, a staffed reception area, and prominent signage and markings. CTAP assumes that all callers are seeking confidentiality and treats each call accordingly. Because CTAP cannot guarantee that information exchanged via e-mail will be secure (i.e., remain confidential), CTAP members do not send confidential information via e-mail. CTAP also discourages its customers from e-mailing confidential questions and, instead, encourages customers to call us directly. To help discourage e-mails, CTAP staff have had their e-mail addresses removed from their business cards. When new circumstances arise that are not addressed in the written Confidentiality Procedures, the matter is discussed among core CTAP staff to determine applicability and reach a consensus. This information then is disseminated to all CTAP personnel so everyone can learn from the situation. If appropriate, the CTAP Confidentiality Procedures are expanded or revised to reflect the new piece of information.
Iowa	IAEAP is funded by the IA DNR Air Quality Bureau (AQB). Contract term required disclosure of the IAEAP client information to the AQB if they need such information. Under newly revised contract, no client list is provided to the AQB unless there is a request. The IAEAP clients are informed that "confidentiality" does not exist under IAEAP.
Kansas	Since the technical assistance component of the program is not part of the regulatory agency (contract to universities), confidentiality is not as an issue. Reports to the regulatory agency from universities include SIC code, county, and general nature of questions. The type of information to be reported is written into the contract. The SBO has requested confidentiality of the various regulatory bureau directors. They have agreed and supported the SBO maintaining confidentiality at all times.

N/A Not applicable N/R No response

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Kentucky	The KY SBTCP is based on independence from the regulatory program. The AQRSB is located in the Commissioner's Office of the Department for Environmental Protection. The KBEAP is offered through the Center for Business Development outside state government. The SBSSAP members are appointed by Executive Order of the Governor. The Economic Development Cabinet raised questions about the language used by the KBEAP regarding client confidentiality during 1996. After much discussion, revisions to these materials were made during the first quarter of 1997.
Jefferson Cty	SBAP is administered from the Air Pollution Control District. Therefore, confidentiality is not as an issue.
Louisiana	LA law prohibits the SBAP from operating in a confidential manner. We do not voluntarily give any enforcement regarding small business activity. Over the last five years the program has developed a reputation of trust among the small business community so that the lack of professed confidentiality has not been a drawback to the program.
Maine	The Department has adopted the Small Business Compliance Incentives Policy based on EPA guidance.
Maryland	N/R
Massachusetts	OTA's programs are confidential by legislative directive. DEP and OTA's client companies are fully aware of this, and there is no COI arising from this issue. We have suggested as an MOU with DEP, which would allow companies to use OTA report letters to self-report violations as proof of good-faith intent and demonstrate that they are working with a compliance assistance unit to remedy the problem. This has not yet been adopted. However, on a case-by-case basis, working with DEP, we have been able to achieve limited success in providing business with penalty-free return to compliance plans.
Michigan	External Conflicts of Interest -- Confidentiality is not as an issue, because the current services provided by the SBTCP are proactive. The SBAP is eluding the confidentiality issue by developing guidance publications, holding workshops, and conducting phone consultations. At present, these activities do not warrant the collection of sensitive data. Additionally, the SBAP does not perform on-site audits, so facility-specific information is not collected. The SBTCP is in the process of developing a policy that explains how the program will respond when it becomes aware of a violation by a facility seeking assistance. The policy also will explain that information contained in the SBTCP files or databases will not be shared with the regulatory agency (MI Air Quality Division). MI's SBTCP cannot claim that this information is "confidential" unless a facility invokes a provision in MI's recently-enacted "Environmental Audit Privilege and Immunity" law, which designates the terms of confidentiality between a facility and the regulatory agency in a "confidentiality agreement." A summary of the state act is attached. Internal Conflicts of Interest -- The SBTCP works closely with the regulatory agency, the MI Air Quality Division, as it develops and executes all of its program objectives. SBAP staff are included in and advised of all policy developments regarding state implementation of the CAA. MI's SBAP acts as as an education, outreach, and marketing arm for the state's air quality program, and that role has assisted the SBAP in avoiding internal conflicts of interest.

N/A Not applicable N/R No response

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Minnesota	The memorandum of understanding between the SBAP and the Air Quality Compliance and Enforcement Section that established as an independence between the two programs has continued to work well. This is supported by the absence of any reportable conflicts of interest or negative perception issues occurring during the reporting period. SBTCP strives to work pro-actively within business sectors to emphasize the independence of the program, and subsequently, its ability to deal with confidential information. The program has also worked hard to earn the trust of industry and trade association representatives and pertinent local, county, and state officials. These relationships have proven to be valuable tools with respect to establishing the program's independence and trustworthy reputation.
Mississippi	SBO and SBAP are regarded by DEQ as independent, confidential, and non-regulatory. Regulatory programs regard the SBO and SBAP as confidential to small businesses. On-site assistance is provided by as an outside organization as authorized in EPA's Enforcement Response Policy for SBAP's option 2. Therefore, no written correspondence on the compliance status of a small business is maintained by the SBO and SBAP.
Missouri	MO operates under a "Sunshine Law," which is the state's open meetings and records law and is found in Chapter 610 of the Revised Statutes in Missouri -- Governmental Bodies and Records. The law sets out the specific instances when a meeting, record, or vote may be closed, while stressing these exceptions are to be strictly interpreted to promote the public policy of openness. Unless otherwise provided by law, records of a public governmental body are to be open and available to the public for inspection and copying. The Technical Assistance Program is a public governmental body, and our records are open to the public by law and cannot be confidential. To address this situation, the Technical Assistance Program does not circulate informational copies of letters and reports. Additionally, the regulatory programs within DNR do not seek to review files within the Technical Assistance Program unless a facility is placed under enforcement action based on other information. To date, there have been no issues arise.
Montana	SBO/SBAP adopted the EPA's Compliance Incentives for Small Business Policy. The Department of Environmental Quality recognizes the policy and grants the SBO/SBAP authority to offer protection to small businesses in exchange for compliance agreements and progress. The result of this agreement was that the regulatory agency's enforcement function now regularly forwards the small business cases it receives directly to the SBO/SBAP. It recognizes that the SBO/SBAP, with the compliance incentives policy, is much better equipped to achieve compliance.
Nebraska	This is not a problem in NE.

N/A Not applicable N/R No response

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Nevada	NV SBAP feels that confidentiality should not be as an issue for a business that is actually interested in complying with state and federal regulations. The impetus behind the federal SBTCP was to provide additional assistance for businesses in complying with environmental regulations and thus, ensuring a higher rate of compliance in general. If this assistance includes relief from or consideration of reduced penalties for those facilities that are in non-compliance and have voluntarily come forward, more businesses may be inclined to seek assistance. The internal problems stem from the federal SBTCP and down to the states in that consideration for reduced penalties cannot or are not taken when a facility is found to be in violation prior to seeking assistance. It is apparent that most small businesses cannot afford the maximum fines and penalties for non-compliance, to then take the necessary steps to gain compliance (applying for permits, increasing control equipment, etc.) and to continue in business. The SBTCP program is one of assistance, implying that government is trying to create a more friendly atmosphere for compliance by small businesses. If we, as government agencies and our contractors, continue to imply that confidentiality is a benefit or necessity with regard to assistance, we are undermining the very atmosphere we are trying to create. When the hazardous waste regulations were first implemented and it seemed everyone was afraid to come forth to discuss their business processes for fear of becoming a "Superfund site," confidentiality was of benefit to bring businesses into compliance. Environmental protection has come a long way since implementation of CERCLA, and if government really is interested in assisting small businesses and increasing compliance, we have to take steps to increase the public's trust, not continue as an atmosphere implying one must have confidentiality to receive assistance.
New Hampshire	NH SBAP/SBO offers small businesses several options when dealing with confidentiality. State laws have been passed, which grant businesses audit privilege for self-audits and confidentiality when accessing assistance programs. In addition, businesses can take advantage of the EPA Small Business Compliance Incentives Policy for enforcement protection. The SBAP's policy is to offer businesses the option of remaining anonymous or taking advantage of the Compliance Incentives Policy. Businesses are encouraged towards the latter, as a confidentiality program will not protect them if as an inspection occurs and a violation is discovered. As the SBAP/SBO finalizes a state level policy based on the federal policy, we expect as an increase in choosing the incentives policy over the confidentiality policy.
New Jersey	SBAP has agreement with DEP Enforcement that SBAP information is confidential. SBAP explains this on the phone or at meetings, seminars, conferences, etc.
New Mexico	NM SBAP does not offer confidentiality. However, any information that is observed by or revealed to the SBAP and claimed as a trade secret by the small business will be treated as such by the Department to the extent allowable under state law. The procedure for identifying trade secrets to the Department is described in NMED's Public Records and Inspection Policy.

N/A Not applicable N/R No response

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
New York	Neither the SBO or SBAP is located within New York State's regulatory enforcement agency, the Department of Environmental Conservation (DEC). Additionally, NY has legislated confidentiality for both the SBO and SBAP. This information, obtained by the SBTCP is the course of providing compliance assistance, is exempt from the Freedom of Information Law. All SBTCP contacts are held in strictest confidence, and requests to DEC for information or regulatory clarification are made without revealing the client's identify, unless the SBTCP has obtained prior approval from the client to do so. The SBAP's offices are in the same building as the central offices of DEC. Having identical street addresses has meant that the SBAP must take great care to assure clients that materials they send to the SBAP during the course of receiving technical assistance are not shared with DEC and are held completely in confidence.
North Carolina	In November 1993, the NC Department of Environment, Health, and Natural Resources issued a Confidential Policy for the Offices of Waste Reduction and Small Business Ombudsman. Since the entire SBAP and SBO are in the Office of the Small Business Ombudsman, the policy applies to all operations of the SBTCP. The policy states that the regulatory Divisions will not seek to obtain information about compliance of any individual or company from the two assistance offices. Further, it states that the OWR and SBO will maintain confidentiality of information to the maximum extent allowed by law.

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
North Dakota	The environmental programs of the Department's Environmental Health Section have traditionally been compliance assistance-oriented, with enforcement reserved for recalcitrant violators or where damage to health or the environment has occurred. Even prior to the establishment of the SBAP and SBO, the Department's emphasis has been on educating and assisting the regulated community to achieve compliance. So with the establishment of the SBAP and SBO, the fundamental approach to compliance hasn't noticeably changed. However, with the establishment of the SBAP and SBO, there has been more outreach activity. Since the SBO is housed in and employed by the Department of Health, it is unknown whether small businesses are reluctant to request assistance or confide in the SBO. Besides serving as SBO, the ombudsman has other duties that support the administrative functioning (e.g., petroleum product quality testing program, emergency response coordination, quality assurance, P2 and various staff training needs) of the Environmental Health Section. The SBO's assistance regarding enforcement matters has not been requested to date. The SBO has requested the Department's Chief of the Environmental Health Section refer cases to the SBO when a small business expresses dissatisfaction or frustration in their dealings with the Department. This is as an area that should receive continued monitoring and evaluation. Dialogue between the SBO and SBAP has resulted in the understanding that small businesses may reveal certain information to the SBO that may be treated confidential and not disclosed to or sought to be disclosed from the SBAP. Information disclosed by small businesses directly to the SBAP staff would not be turned over to the compliance program staff for enforcement purposes; however, it is expected that a plan for correcting any violations would be developed. When needed, compliance assistance will be provided from the SBAP. The SBAP's and SBO's position is that confidentiality (disclosure of violations to enforcement staff) has really been a non-issue in ND.
Ohio	SBAP is physically separated from OEPA enforcement staff (different floors) and is not located at a district office where enforcement begins. SBAP files are kept in a separate area, and SBAP databases are accessible by SBAP only. SBAP has not experienced any problems with keeping information confidential. In some cases where the customer was referred by a district office because of violations, the SBAP has spoken directly with the district to resolve the problem. This was done only with the prior approval of the company. In addition, the sections of the OH Revised Code, which set up both the SBO and SBAP programs, include very clear and strict confidentiality restrictions on any and all information gathered by the programs. This statutory language provides comfort to many businesses.

N/A Not applicable N/R No response

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Oklahoma	In OK, the SBAP is housed in the Customer Assistance Program within the Department of Environmental Quality. As a result, we are provided with a strong identity in regards to confidential assistance. Our group is supported very strongly by our Agency management and, as a result, we are provided with the tools we need within our own Agency to provide quality confidential assistance.
Oregon	Information disclosed and minor violations discovered during on-site small business technical assistance visits are protected by state statute except when there is reasonable cause to believe there is clear and immediate danger to public health or safety of the environment. In accordance with the state statute and the confidentiality option set forth in EPA's Office of Enforcement and Compliance enforcement policy, the OR SBAP adopted a written confidentiality policy. In summary, this policy allows the SBAP to: function independently of the enforcement section, restrict access to information and files of small businesses receiving technical assistance, keep businesses' names and locations in a separate confidential file, and perform follow-up consultations to assure resolutions of violations discovered during on-site visits. This policy has prevented conflicts inside and outside the agency. To the contrary, it allows additional flexibility to bring small businesses into environmental compliance. For example, it allows the SBAP to assist a small business that faces enforcement through other channels by allowing staff to assist with P2, apply for permits, and mitigate penalties via supplemental environmental projects (SEP). In such cases, OR's confidentiality policy is congruous with EPA's Policy on Compliance Incentives for Small Businesses.
Pennsylvania	Many services of the PA SBAP have been contracted to a private company. The terms of this contract prohibit the contractor from providing client names and addresses to the regulatory agency. The contractor primarily seeks contracts with government agencies, and therefore does not normally have small business clients outside the SBAP contract. This arrangement, to date, has avoided any problems with conflict of interest and has provided a solution to the confidentiality issue.
Puerto Rico	We're still working on how to avoid COI in our office. Right now, a recommendation has been suggested that once a small business receives a notice of violation, that business should be given a choice to be assisted by the SBAP as a compliance alternative.
Rhode Island	RI DEM has been operating a non-regulatory technical assistance program since 1987. Since that time, we have worked with more than 350 companies and have gained the trust of many more. Conflicts of interest are avoided through close coordination with the regulatory Office of Air Resources. Coordination with our state's Economic Development Corporation also has been helpful in stressing our Office's pledge to work with industry on a confidential basis.
South Carolina	This has not been as an issue with our program. We are not located in the regulatory section of the agency. We are located in as an outreach/liaison division.
South Dakota	N/A

N/A Not applicable N/R No response

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Tennessee	Any contact with the regulatory agency is okayed with the company in advance. We have been able to intervene in some potential enforcement actions to assist a business in coming into compliance. We constantly state our purpose and the fact that we have no enforcement authority. We have a good working relationship with the regulatory agencies in our state. They routinely make referrals to us. We have frequent communications with the regulatory agency. We are housed separately from regulatory agencies.
Texas	TX's confidentiality policy states: All contact with the Small Business Assistance Program is confidential, and the enforcement division of the TNRCC cannot seek information regarding these contacts. This policy has allowed us to work with our enforcement offices on a number of projects, like the Wood Amnesty and our Foundry Initiative, and still maintain the confidentiality of the businesses that contact us. We have found that when we work with our enforcement offices on a project, we are able to increase compliance for as an industry, because the businesses know that there is as an increased chance they may receive a visit from one of our inspectors. Many businesses like our confidentiality policy and have said that it gives them confidence to call us. Usually, once a business uses our services, they will contact us again. Because we have a high satisfaction rate, we have a large number of repeat callers. However, even with this policy, some small businesses are still afraid to contact our office, because we are seen as a regulator.
Utah	SBTCP has developed a small business compliance policy, which is in review by the Attorney General's Office. We use EPA's policy on compliance incentives for small business (issued May 20, 1996).
Vermont	SBAP is located in a non-regulatory division of the VT DEC. The state's statute on public access to documents prevents the SBAP from being "confidential." However, a separate SBAP documents policy was signed by the Agency Secretary to provide some degree of confidentiality to the small businesses. The documents policy requires a "sign-off" by Department heads for access to occur from outside the DEC. The policy also restricts the use of the file information by Department personnel. This information may not be used by inspectors for targeting inspections or initiating enforcement actions. Businesses are notified should access occur by any means. The regulatory program staff have been most supportive of the program and have shown no interest in accessing the SBAP files. As a matter of fact, the regulatory staff has forwarded more business (to date) to the program than by any other means. There has been no inquiries (to date) for access to SBAP files.

N/A Not applicable N/R No response

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Virginia	The issue of confidentiality as indicated in last year's report has not yet been a major problem, but it is still felt that this issue will take on more importance when the SBAP is able to provide voluntary, complimentary compliance audits as part of normal program operations. The ability to deliver a quality product to the customer is only as good as the credibility of the provider. The ability to correct deficiencies and non-compliance situations through the 507 Enforcement Policy provides a non-confrontational means to achieve compliance assistance and deliver a quality product. The ability to fix a problem with relative ease can be put into the category of a smart business decision. Within DEQ, the SBO/SBAP continues to maintain as an excellent working relationship with the Enforcement and Compliance Office, which also helps to ensure as an understanding of the needs on both sides of compliance enforcement issues. We both recognize that compliance is the ultimate goal, and compliance assistance can become, and is, a means to that end. VA also has the additional tools of voluntary remediation and voluntary audit privilege, which are available to the business community. The DEQ has at its disposal EPA's Section 507 Enforcement Policy and is in the process of creating guidance that will incorporate EPA's June 10, 1996 Self Audit Policy into the agency's compliance/enforcement tools.
Virgin Islands	N/A
Washington	Separation of enforcement and technical assistance functions is written into RCW.
West Virginia	SBAP operates separately and independently from the enforcement group of the agency. Also, the SBAP currently is housed in a separate physical location. To better help small businesses, enforcement refers some violators to the SBAP for technical assistance to facilitate compliance. The SBO also intervenes in specific enforcement actions to ensure that small businesses are fairly treated. The SBAP does not refer any cases to enforcement, except in the case of imminent danger. However, to ensure that compliance is eventually achieved, the SBAP will make on-site assessment files available to enforcement after as an 18-month grace period. The business is not shielded from enforcement actions related to violations independently discovered by state (or federal) inspectors during this period. Such independent discovery may occur through routine inspection activity or complaint investigation. The DEP Director has given strong assurances that the confidentiality of all assistance programs shall be respected.
Wisconsin	The WI SBAP/SBO is a cooperative effort between the WI Department of Natural Resources (DNR) and the non-regulatory component of the WI Department of Commerce (COMMERCE). The primary responsibility for interacting with business rests with COMMERCE staff. A memorandum of understanding has been established between COMMERCE and DNR that allows businesses to speak to COMMERCE staff on a confidential basis. As a rule, we ask our customers if they do not want to be identified if we have to discuss their situation with DNR representatives.

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Wyoming	Our non-regulatory program offers confidentiality as one of our main selling points. That fact is highlighted in all of our publications, mentioned each time we make a presentation and reinforced each time we get a call or visit a business. It is a key factor in the progress we are making. However, the process has never really been tested. There is no document that formalizes the arrangement for legal purposes and, if challenged in court, our policy could be found wanting a legal foundation.

N/A Not applicable N/R No response