



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

**Report To Congress
For The Period
January To December 1995**

REPORT TO CONGRESS

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

**FOR THE REPORTING PERIOD
JANUARY - DECEMBER 1995**

PRESENTED BY:

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

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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
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 first 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, 1995.

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 SBO. The Report also includes a general report on the Small Business Ombudsman'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 comply with the requirements of the CAA through state-operated programs. Each SBTCP is required to include three components: a Small Business Ombudsman (SBO), a Small Business Assistance Program (SBAP), and a Compliance Advisory Panel (CAP).

In the first year of monitoring the SBTCPs, over 75,000 small businesses have been directly reached, and over 2,000 on-site consultations have been conducted. 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 the information reported, improvements in compliance occur because businesses have someone to turn to for assistance, advice, and effective liaison with regulatory agencies.

SBTCP yearly operational growth has been continuous since 1990. Presently, 50 SBOs (94 percent), 49 SBAPs (92 percent), and 32 CAPs (60 percent) are operational.

The SBTCPs are staffed with two or fewer full time equivalents (FTEs) in 77 percent of the SBO functions and 4 or fewer FTEs in 70 percent of the SBAP functions. 49 percent of programs report that at least the required 7 members have been appointed to their CAPs.

Budgets for the SBTCPs have a wide range from \$0 to over \$2,000,000 for 1995. 98 percent of SBOs (39 of 40) with their own budgets operate their programs with less than \$200,000. For all 53 programs, 21 percent operate with budgets of between \$0 and \$25,000; 22 percent operate with budgets of between \$25,001 and \$50,000; 9 percent operate with budgets of between \$50,001 and \$75,000; and 8 percent operate with budgets of between \$75,001 and \$100,000.

Similarly, of the 41 SBAPs with their own budgets, 88 percent are allotted less than \$400,000. For all 53 programs, 11 percent operate with budgets of between \$0 and \$25,000; 8 percent operate with budgets of between \$25,001 and \$50,000; 8 percent operate with budgets of between \$50,001 and \$75,000; and 8 percent operate with budgets of between \$75,001 and \$100,000. Projected budgets reflect positively on the programs, as 75 percent of all programs report either a consistent or increasing budget for 1996.

72 percent of SBTCPs provided specific information on the types of industry sectors and number of facilities that their programs assisted. 105 specific industry sectors received assistance in 1995. The top 10 industry sectors that received assistance by SBTCPs were:

- vehicle maintenance and repair
- metal fabrication
- degreasing
- dry cleaning
- printing
- gasoline distribution
- consulting
- chrome plating
- regulated storage tanks
- government.

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

- dry cleaning
- vehicle maintenance and repair
- dentistry
- cleaning/laundry services
- metal fabrication
- printing
- chemicals
- chrome plating
- plastics and plastic products
- cut/crushed stone and products.

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

- dry cleaning (29 programs)
- vehicle maintenance (24 programs)
- printing (22 programs)
- chrome plating (19 programs)
- degreasing (18 programs)
- metal fabricating (13 programs)
- chemicals (11 programs)
- gasoline distributing (9 programs)
- hospitals/medical/health services (9 programs)
- paints and painting (9 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 electronic bulletin board services and World Wide Web pages are being used, but could be more widely integrated.

66 percent of SBOs, 81 percent of SBAPs, and 40 percent of CAPs 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.

83 percent of the programs 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.

- 42 percent of programs report taking specific actions associated with the Paperwork Reduction Act, with the most common action being CAP review of SBTCP documents.
- 42 percent of programs report taking specific actions with respect to the Regulatory Flexibility Act. The most common actions included development of simplified/consolidated permits and forms and increased exemptions for "insignificant actions."
- 30 percent of SBTCPs reported specific actions associated with the Equal Access to Justice Act through the establishment of pro bono legal services and the availability of funding for engineering services for citizen groups aggrieved by permit actions of a regulatory agency. Primary actions listed by the programs include routine review of documents for compliance, increasing exemptions for "insignificant actions," and use of general industry-specific permits to reduce the number or complexity of permits.

While the number of programs reporting specific actions to follow the intent of the provisions of these Acts is small, the steps being taken appear to be fairly effective in addressing the unique need of small businesses.

81 percent of SBTCPs report that small businesses provided comments on the assistance programs and that feedback was overwhelmingly positive. Common themes repeated by small businesses include appreciation for the availability of a non-regulatory approach for certain problems and for personalized guidance through the many regulatory processes leading to compliance.

49 percent of programs provided examples of complaints 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 explanations of regulatory requirements in "plain language."
- Providing personalized assistance in the permitting process.
- Facilitating communication about regulatory flexibility issues between small business and regulatory agencies.

85 percent of the SBTCPs provided insight on the types of compliance issues addressed during the course of providing technical assistance to small businesses. Two of the three most common compliance problems mentioned by small businesses were, "Not understanding the regulatory requirements," and "Operating without a permit." Programs reported, "Greater understanding of the regulations," and "Increased compliance," as a result of program outreach efforts.

Generally, 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.

44 SBTCPs provided recommendations for changes to facilitate small business compliance with the CAA. The most frequent recommendation was flexibility in applying regulations to small businesses (30 percent of programs).

In addition to inquiries regarding air issues, many programs are being contacted about multi-media problems as well. 26 percent of programs suggested expanding assistance to cover multi-media programs (i.e., air, water, solid waste).

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. 89 percent of programs reported no problems concerning confidentiality or with conflict of interest issues during the course of providing services. 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

- SBTCPs are being run by hardworking, dedicated staffs who operate successful programs with often limited budgets and resources. Small businesses are grateful for the technical assistance and personalized attention from people they can trust. In this first year of gathering information from the programs, over 75,000 small businesses have been reached, and over 2,000 on-site consultations have been performed.
- SBTCPs facilitate dialog between the small business community and the regulatory community, fostering improved attitudes towards regulatory compliance.
- Programs have significant expertise and are increasingly becoming multi-media as states want to offer this type of assistance, and small businesses are requesting it.
- Commonly identified compliance problems include not understanding regulatory requirements and operating without a permit. SBTCPs suggested reasons for these problems may be the overwhelming volume of regulations, businesses' fear of talking to regulators, and the difficulty of businesses in contacting regulatory agencies. 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 promoting compliance in 1995. Highlights include improved synergy between the regulatory agencies and the small business community, and increased cooperation among SBTCPs. Award programs have proved to be effective in providing incentives, both for small businesses and the programs themselves. Programs should consider developing award 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 Acts. 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. It is important that adequate resources are allocated to permit on-site visits by their staff.
- With the strong small business technical assistance infrastructure in place through the SBTCPs, programs should explore their potential to expand into multi-media assistance. A number of programs already offer multi-media assistance and permitting, which can ease the regulatory burden on small businesses and promote compliance.

- Efficiency of information transfer (among SBTCPs and to small businesses) can be realized through the increased use of electronic bulletin boards and Internet home pages. Presently, only 25 percent of programs operate some type of electronic information transfer. Such electronic services also would be promising mechanisms to avoid duplication of effort among programs. Programs are encouraged to explore the potential of the Internet or bulletin board services for sharing information with small businesses and with other SBTCPs.
- Only 9 percent of SBTCPs report utilizing a formalized approach to evaluating their own programs' effectiveness (using standardized evaluation forms, surveys, and workshop evaluations). Increasing the use of formal feedback mechanisms may allow programs to accurately identify the strengths and weaknesses and to modify their services to better meet small business needs. Programs should interact with those SBTCPs that have developed formal evaluation mechanisms and develop strategies to integrate some level of formal evaluation into their programs to more effectively track the value of services provided and compliance.
- Programs are encouraged to explore the potential for sponsoring or facilitating financial assistance programs for pollution control or pollution prevention capital expenses. (Only 19 percent of SBTCPs reported the availability of financial assistance programs in 1995.) Small businesses have expressed their need for creative financing mechanisms, which was a common recommendation for enhancing compliance.
- SBTCPs are often underfunded and understaffed as they provide their current level of services. Because of this, they are likely to be challenged to expand their function both in air-related outreach and multi-media technical assistance. SBTCPs are encouraged to better utilize the expertise of their CAP members to enhance improvements in their technical assistance programs. States without functioning CAPs should activate their CAPs during the next reporting year.

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, 1995 reporting period.

This report represents the first 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 as amended in 1990 (CAA) of 1990.

This report is being submitted in accordance with Section 507(d), *Monitoring*, of the CAA, which directs the EPA to provide Congress with an Annual Report 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 November 1995, EPA's SBO distributed copies of the SBTCP Annual Reporting Form (for the reporting period January through December 1995) 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 1995 SBTCP Reporting Form is enclosed as Appendix A.

Since this was the first time that information was gathered from the SBTCPs, it was anticipated that some programs may not collect all the types of information that were requested in the Form. 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, 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 March 31, 1996. 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). All 53 programs filed their 1995 Reports with EPA's SBO by March 31, 1996.

In addition, Arizona and New Mexico have distinct air quality districts within their states, which also submitted reports. In Arizona, Pinal County, Maricopa County, and Pima County and Tucson submitted separate reports. In New Mexico, Bernalillo County reported separately. State reports from Arizona and New Mexico do not include the data shown in the reports from the air quality districts. For statistical purposes of this report, data from states that submitted multiple reports have been combined. Raw data for the separate air quality districts are shown in the appendices.

According to an EPA proposed action in 60 *Federal Register* 47515, the EPA is proposing to grant conditional waivers from the requirement that the Territory of American Samoa and Commonwealth of the Northern Mariana Islands (CNMI) adopt and submit title V operating permit programs. The EPA is proposing to grant the Territory of Guam a three-year extension of the deadlines of title V. The EPA is also proposing to exempt sources from the requirements to obtain a federal title V permit during the period of the waivers, except for certain major sources of hazardous air pollutants. 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 1995 also are outlined.
- Section 6.0** **Compliance Assurance** -- 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

This section provides an overview of the Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCPs).

As part of Section 507 of the Clean Air Act Amendments, as amended in 1990 (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 "Section 507 programs") is required to include the following three components:

- 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, 1995, 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 submitted/approved are:

- Hawaii -- not yet submitted
- Rhode Island -- submitted, but not yet final
- 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:

- Review and provide recommendations to EPA and state/local air pollution control authorities regarding development and implementation of regulations impacting small businesses.
- Assist in dissemination of information about upcoming air regulations, control requirements, and other matters relevant to small businesses.
- Refer small businesses to appropriate specialists for help with specific needs.

- Conduct 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 should provide sufficient communications with small businesses through the collection and dissemination of information to the small businesses on matters of:

- Determining applicable requirements under the Act and permit issuance.
- 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 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 provides technical guidance for the use of the SBTCPs in the implementation of their programs. The Federal SBAP provides this service, which is coordinated by the Control Technology Center within the Information Transfer Group of the Office of Air Quality Planning and Standards. Information on the activities of the Federal SBAP may be found in Appendix C.

3.0 SBTCP STATUS, BUDGETS, STAFFING, AND ORGANIZATION

This section presents 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 1995 reporting period.

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

3.1 OPERATING STATUS

Importantly, by December 31, 1995, 50 programs (94 percent of the 53 states and U.S. territories) had been established and were providing assistance to small businesses through their SBOs and SBAPs. Only 32 programs reported that their CAPs were operating; however, 40 programs reported that the CAPs had been established.

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	50	94	49	92
CAP ⁴	40	75	32	60

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 12/31/95, SBOs were reported not to be established or operating in Massachusetts or Vermont. Hawaii did not provide a response and was counted as not being operational.

Note 3: As of 12/31/95, SBAPs were reported not to be established or operating in Rhode Island or Vermont. (However, Rhode Island's Department of Environmental Management staff have been responding to inquiries.) Nevada's SBAP was established, but not yet operating. Hawaii did not provide a response and was counted as being not operational.

Note 4: As of 12/31/95, CAPs were reported not to be established or operating in 13 programs: California, Delaware, District of Columbia, Hawaii, Iowa, Illinois, Maryland, Massachusetts, New York, Oklahoma, Ohio, Rhode Island, Vermont, or the U.S. Virgin Islands. In addition, 6 other states reported that their CAPs had been established, but not yet operating: Alabama, Arizona, Missouri, New Hampshire, Oklahoma, Ohio, Puerto Rico, and Tennessee.

Appendix D-2 contains details on the actual dates (month/year) when the SBOs, SBAPs, and CAPs were reported to be established and operational.

As seen in Table 3-2, the majority of the SBOs, SBAPs, and CAPs did not begin operations until 1993. Since that time, 38 (72 percent) SBOs, 35 (66 percent) SBAPs, and 32 (60 percent) CAPs became operational.

TABLE 3-2 START OF OPERATIONS FOR SBTCP FUNCTIONS						
	SBO		SBAP		CAP	
	Number	Total	Number	Total	Number	Total
1990			1	1		
1991			1	2		
1992	12	12	12	14		
1993	20	32	16	30	9	9
1994	10	42	16	46	12	21
1995	8	50	3	49	11	32
% operational by 12/31/95	94%		92%		60%	

3.2 BUDGETS

3.2.1 1995 Reporting Period

As detailed in the paragraphs and tables below, the total operating budgets for the SBTCPs varied from \$0 to over \$2,000,000 for the 1995 reporting year. These extremes include \$0 for Massachusetts and Vermont, whose SBO/CAP and SBO/SBAP/CAP, respectively, have not yet begun operations, to Texas, reporting a

total operating budget of \$1,470,000 for its SBTCP program and New York, reporting a total operating budget of \$2,156,000.

1995 operating budget ranges for the SBTCPs are shown in Table 3-3. 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 1995 SBTCP OPERATING BUDGET RANGES		
BUDGET \$	# Programs	% Programs
0	2	4
1 - 100,000	9	17
100,001 - 200,000	14	26
200,001 - 300,000	9	17
300,001 - 400,000	7	13
400,001 - 500,000	2	4
500,001 - 600,000	3	5
600,001 - 700,000	1	2
700,001 - 800,000	0	0
800,001 - 900,000	2	4
900,001 - 1,000,000	0	0
> 1,000,000 ¹	1	2
> 2,000,000 ²	1	2
Report submitted, no data provided ³	2	4
TOTAL	53	100

Note 1: Texas
 Note 2: New York
 Note 3: Florida, Hawaii.

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

40 SBOs have their own budgets. Budgets for these SBOs are concentrated in a range below \$200,000, with 39 of 40 SBOs (98 percent) reporting budgets between \$0 and \$200,000. The primary source of funding for all programs is Title V fees (53

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 1995 operating budgets for the SBOs is shown in Table 3-4.

TABLE 3-4 1995 SBO OPERATING BUDGET RANGES (40 non-combined budgets)		
Budget (\$)	# Programs	% Total Programs
0 - 25,000	11	21
25,001 - 50,000	12	22
50,001 - 75,000	5	9
75,001 - 100,000	4	8
100,001 - 200,000	7	13
> 1,000,000	1	2
Combined budgets ¹	11	21
Report submitted, no data provided ²	2	4
TOTAL	53	100

Note 1: 11 programs (21 percent) indicate that two or three of the three SBTCP functions share a combined budget. 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). 11 SBOs have combined budgets.

Note 2: Florida (indicated a combined budget, but did not provide an amount and was tallied as, "no response."), Hawaii.

3.2.3 SBAP Operating Budgets

41 SBAPs have their own budgets. SBAP budgets are spread across a wider dollar range with 18 of 41 programs (44 percent) between \$0 and \$100,000, 8 of 41 programs (20 percent) between \$100,001 and \$200,000, and 6 of 41 programs (15 percent) between \$200,001 and \$300,000. Title V fees again are the main funding source (58 percent of all programs); funds from EPA 105 Grants, non-Title V fees, indirect funds, and permit fees are also used to support SBAPs.

Ten SBAPS have combined budgets of less than \$400,000. One program (Tennessee) has a combined budget of between \$850,001 and \$900,000 (reflecting all three functions), and one program (Texas) has a combined budget of over \$1,000,000 (for all three functions).

The range of 1995 operating budgets for the SBAPs is shown in Table 3-5.

TABLE 3-5 1995 SBAP OPERATING BUDGET RANGES (41 non-combined budgets)		
Budget (\$)	# Programs	% Total Programs
0 - 25,000	6	11
25,001 - 50,000	4	8
50,001 - 75,000	4	8
75,001 - 100,000	4	8
100,001 - 200,000	8	15
200,001 - 300,000	6	11
300,001 - 400,000	4	8
400,001 - 500,000	3	6
600,001 - 700,000	1	2
900,001 - 1,000,000	1	2
Combined budgets ¹	10	19
Report submitted, no data provided ²	2	4
TOTAL	53	100

Note 1: 11 programs (21 percent) indicate that two or three of the three SBTCP functions share a combined budget. 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). 10 SBAPs have combined budgets.

Note 2: Florida (indicated a combined budget, but did not provide an amount and was tallied as, "no response."), Hawaii.

3.2.4 CAP Operating Budgets

43 CAPs have their own budgets. CAP funding ranges from \$0 (42 percent of programs with their own budgets) to a high of \$30,000 (one program, New York). 88 percent of CAPs operate with a budget of \$5,000 or less. Title V fees are the most commonly listed funding source for all CAPs (40 percent).

The range of 1995 CAP operating budgets is shown in Table 3-6.

TABLE 3-6 1995 CAP OPERATING BUDGET RANGES (43 non-combined budgets)		
Budget (\$)	# Programs	% Total Programs
0	18	34
1 1,000	3	6
1,001 - 2,000	3	6
2,001 3,000	4	8
3,001 - 4,000	0	0
4,001 - 5,000	10	19
9,001 10,000	4	8
29,001 - 30,000	1	2
Combined budgets ¹	8	15
Report submitted, no data provided ²	2	4
TOTAL	53	100

Note 1: 11 programs (21 percent) indicate that two or three of the three SBTCP functions share a combined budget. 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). 8 CAPs have combined budgets.

Note 2: Florida (One program (Florida) indicated a combined budget but did not provide an amount, and was tallied as, "no response."), Hawaii.

3.2.5 Comparison of Previous and Projected Budgets

A comparison of budgets from 1994, 1995, and 1996 (projected) is valuable in tracking program growth and resource allocation. Programs were asked to indicate significant budget changes (greater than 10 percent) from year to year and to provide

insight into any major shifts (more than 10 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
1994 to 1995 Reporting Period	2	4	20	38	28	53	3 ²	6
1995 to 1996 Reporting Period	5	9	25	47	15	28	8 ³	15

Note 1: Not all programs provided budget amounts. 13 programs (25 percent) did not have an established SBTCP during the previous reporting period. 8 programs (15 percent) were unable to project their budgets for the next reporting period. 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: Florida, Hawaii, Vermont

Note 3: Florida, Hawaii, Minnesota, Nevada, New Hampshire, North Carolina, Puerto Rico, Vermont

In reviewing the combined budgets for the SBO, SBAP, and CAP functions of the SBTCPs, 28 programs (53 percent) indicate a budget increase (of at least 10 percent) from the 1994 to 1995 reporting periods. 15 programs (28 percent) show an increase from the 1995 to 1996 reporting periods.

According to responses received, 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 10 percent are provided below:

- Connecticut projects a budgetary increase (\$210,000/1995 - \$330,500/1996) for the 1996 calendar year. The SBTCP will see an increase in funding due to \$150,000 SBAP Leadership Grant as well as the addition of two staff people.
- New York moved into full SBTCP implementation. Appropriations increased to cover expanded scope of services (\$2,156,000/1995 - \$2,230,000/1996).

- Iowa's funding levels have systematically increased (\$306,500/1995 \$394,500/1996) because of Department of Natural Resources-Air Quality Board budget increase through collection of Title V revenue and because of DNR's and businesses' recognition of Iowa's success in assisting small businesses with improving compliance rates and emission reduction rates.

20 programs (38 percent) report steady budget levels (less than a 10 percent change) for the 1994 to 1995 reporting periods, and 25 programs (47 percent) indicate consistent budget levels from the 1995 to 1996 reporting periods.

Only 2 programs (4 percent) show a decrease (more than 10 percent) from the 1994 to 1995 reporting periods, and 5 programs (9 percent) report a decrease from the 1995 to 1996 periods.

Budget reductions could be attributed to program reorganizations and consolidations and lower projected costs to maintain a program (versus the higher resource requirements to develop a program). Program examples of reasons given for budget reductions greater than 10 percent are shown below:

- Louisiana SBO contract was reduced by the funding agency (\$450,000/1995 \$400,000/1996).
- For the first half of 1995, Maryland SBAP was funded for three engineers and a dedicated secretary. As a result of the Maryland Department of the Environment's reorganization, the program was reduced to one engineer and 15 percent of a secretary. The scope of the program was changed from air-only assistance to multi-media assistance. Funding was moved from the Air and Radiation Management Administration to the indirect funds from the Office of the Secretary (\$210,000/1995 \$60,000/1996).
- The last 2 calendar years required more resources in the development of the programs than will be required to maintain the programs, particularly the SBAP. This is based on: 1) past demand for SBAP resources, and 2) estimated small number of small businesses in North Dakota that will be affected by new rules in the next year (\$60,000/1995 \$46,000/1996).
- Texas SBO and SBAP offices were consolidated and four positions eliminated due to agency-wide staff reduction plan. The elimination of these positions was responsible for the 14 percent reduction in funding (\$1,470,000/1995 \$1,260,000/1996).

75 percent of the programs reported either a consistent or increasing budget from the 1995 to 1996 reporting periods.

Budgets for the 1994, 1995, and 1996 reporting periods for the SBO function, SBAP function, and CAP function may be found in Appendix D-4.

3.3 STAFFING LEVELS

41 programs (77 percent) report operating their SBOs with 2 or fewer full-time equivalents (FTEs) as shown in Table 3-8.

37 programs (70 percent) operate their SBAPs with 4 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 Puerto Rico, Louisiana, and Indiana, which report using 10, 11, and 12 FTEs, respectively, to support their SBAP function.

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 FTEs¹) SERVING THE SBO & SBAP FUNCTIONS				
# FTEs	SBO		SBAP	
	# Programs	% Programs	# Programs	% Programs
0	1	2	1	2
1	28	53	15	28
2	12	23	8	15
3	4	8	7	13
4	1	2	7	13
5	1	2	3	6
6	3	6	4	8
7			2	4
10			1	2
11			1	2
12			1	2
TOTAL²	50		50	

Note 1: An FTE is considered to work 40 hours/week. For example, 2 people working 20 hours/week would be equivalent to 1 FTE.

Note 2: 2 states (Connecticut and Texas) combined their SBO and SBAP functions and are report 4 and 20.5 FTEs, respectively. Hawaii did not provide information on their SBO or SBAP.

49 percent of programs report that at least 7 members have been appointed to their CAPs. An overview of CAP appointments is shown in Table 3-9. 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	26	49
Less than 7 members appointed	23	43
No response ¹	4	8

Note 1: Hawaii, Maryland, Vermont, Virgin Islands

3.4 ADMINISTRATIVE LOCATION OF SBTCP COMPONENTS

As shown in Table 3-10, the 52 programs indicated that their SBOs are located within a state/territory-related agency, typically the environmental agency (not necessarily a regulatory section). (Two programs whose SBO function has not been established indicated the intended location for this function.) The majority of programs (47) report to have located their SBAPs within a state/territory-related agency, typically the environmental agency.

As defined in Section 507, the CAPs are to be independent entities, operating outside of any agency. In addition to this independent status, 13 programs also indicated that administrative support is provided to the CAPs by some facet of their state environmental agency or SBO/SBAP.

TABLE 3-10 ADMINISTRATIVE LOCATIONS OF SBO, SBAP, AND CAP						
Location	SBO		SBAP		CAP	
	# Programs	% Programs	# Programs	% Programs	# Programs	% Programs
State-related agency	52 ¹	98	47	88		
University-related			1	2		
Private contractor			3	6		
Independent			1	2	43 ²	81
Not established	1	2	1	2	10	19
TOTAL	53	100	53	100	53	100

Note 1: This number is higher than that reported in Table 3-1. Programs without established SBOs indicated where the SBO is intended to be located once established.

Note 2: This number is higher than that reported in Table 3-1. Programs without established CAPs indicated that they are intended to be independent 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 leverage resources and minimize duplication of efforts may be found in Section 4.4. SBTCP efforts to comply with 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

38 SBTCPs (72 percent) provided specific information on the types of industry sectors and number of facilities that their programs assisted in 1995. Small businesses in 105 specific industry sectors were identified as having been assisted by SBTCPs. Certain industry sectors, such as dry cleaning and vehicle maintenance and repair, received larger numbers of assists, 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 1995 were:

- Vehicle maintenance and repair
- Metal fabrication
- Degreasing
- Dry cleaning
- Printing
- Gasoline distribution
- Consultants
- Chrome platers
- Regulated storage tanks
- Government.

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

- Dry cleaning
- Vehicle maintenance and repair
- Dentistry
- Cleaning/laundry services
- Metal fabrication
- Printing
- Chemicals
- Chrome platers
- Plastics and plastic products
- Cut/crushed stone and products.

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

- Dry cleaning (29 programs)
- Vehicle maintenance (24 programs)
- Printing (22 programs)
- Chrome plating (19 programs)
- Degreasing (18 programs)
- Metal fabricating (13 programs)
- Chemicals (11 programs)
- Gasoline distributing (9 programs)
- Hospitals/medical/health services (9 programs)
- Paints and painting (9 programs).

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 thirteen most active programs, with over 1,000 assistance efforts were:

- California
- Indiana
- Louisiana
- Maine
- Maryland

- Massachusetts
- Mississippi
- Missouri
- Montana
- New York
- Ohio
- Texas
- Wyoming.

Of special note, Texas reported 40,618 general assists and 126 on-site assists. Of this total, 34,532 general and 27 on-site assists were to non-specific industries.

A summary of specific industry sectors receiving assistance, by program, may be found in Appendix E-5.

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 Activities and Services

Outreach services offered by the SBOs during the 1995 reporting period are summarized in Table 4-1. Outreach activities offer a means of informing the small business community about the technical assistance services available from SBOs and providing technical information to small businesses.

The three most common SBO activities, reported in more than 70 percent of programs, were meetings, speaking engagements, and distribution of brochures/flyers. Personal assistance activities, including answering hotline inquiries, providing step-by-step guidance in completing permits and other forms, and other individualized services, also were conducted by 68 percent of SBOs.

**TABLE 4-1
SBO OUTREACH ACTIVITIES**

ACTIVITY	# Programs	% Programs
Meetings	42	79
Speaking engagements	40	75
Brochures/flyers	39	74
Personal assistance (including toll-free hotlines)	36	68
Training sessions	31	58
Press coverage	8	15
Information booths	7	13
On-site visits	6	11
Other ¹	13	25

Note 1: SBO activities classified as "other" included:

- Permit application and compliance assistance
- Technical evaluations
- Water line extensions
- Outreach on state legislation and an environmental fax network
- Teleconferences
- Contacts with Chamber of Commerce offices
- Development of a small business working group
- Informational mailings about regulations, etc.
- Support group seminars
- Participation in regulatory development
- Formation of an Environmental Assistance Coalition and Panel Secretariat.

Detailed information, by program, about the number of occurrences and the number of people reached by each reported SBO activity is presented in Appendix E-6. Details of the SBOs toll-free hotlines are shown in Appendix E-7.

4.2.2 SBAP Activities and Services

An aggregate of the outreach services offered by the SBAPs during the 1995 reporting period is presented in Table 4-2. These outreach services/activities are designed to introduce the available assistance services to small businesses, provide general information, and identify common problems and issues to be addressed on a more specific basis.

The four most common outreach services offered by at least 80 percent of SBTCPs were:

- Seminars, workshops and meetings
- General assistance (including assistance provided via telephone hotlines)
- Distribution of printed materials such as factsheets
- On-site consultations.

**TABLE 4-2
SBAP OUTREACH ACTIVITIES**

ACTIVITY	# Programs	% Programs
Seminars, workshops, meetings, etc.	51	96
General assistance (including telephone hotlines)	50	94
Fact sheets, manuals, etc.	49	92
On-site consultations	44	83
Bulletin board services/World-Wide Web page	12	23
Permit and compliance assistance	9	17
Teleconferences	4	8
Newsletters	3	6
Pollution prevention assistance	3	6
Other ¹	13	25

Note 1: SBAP services classified as "other" included the following:

- Sector-based activities
- Technical Reference Center
- Technical evaluations
- Water line extensions
- Coordination with Regional Permit Assistance Centers
- Staff training
- Enforcement negotiations
- Fax-back and customer connect service
- Information booths at state fairs, trade shows, or conferences
- Referrals to the Small Business Resource Center
- Multi-media assistance
- Loan programs
- Surveys
- Advisement panel
- Amnesty programs
- Regulation development.

Detailed information, by program, about the number of occurrences and the number of people reached by each SBAP during the 1995 reporting period is shown in Appendix E-8. SBAP telephone hotline information is listed in Appendix E-9.

Of particular note is the number of SBAPs that are using Bulletin Board Services (BBSs) and World Wide Web (WWW) home pages to disseminate technical assistance information. The 13 programs that are currently using BBSs or WWW home pages are: California, Illinois, Louisiana, Massachusetts, Missouri, New Jersey, New Mexico, Ohio, Pennsylvania, Texas, Utah, West Virginia, and Wyoming.

The types of information available via these BBSs or WWW home pages are listed in Table 4-3; detailed information on these BBSs and home pages, by program, may be found in Appendix E-10.

TABLE 4-3 INFORMATION AVAILABLE ON SBAP BBS AND WWW PAGES		
Type of Information	# Programs	% Programs
Regulations	12	23
Pollution Prevention	8	15
Application Forms	6	11
Policies	3	6
Other ¹	12	23

Note 1: "Other" information available from SBAP bulletin boards includes:

- Fact sheets and checklists
- Documents to view and/or order
- Meeting and workshop schedules
- Emission calculation data and inventory forms
- Contact names and telephone numbers
- Reporting deadlines
- Financial assistance information
- Office of Technology Assessment (OTA) case studies
- OTA and EPA software packages
- Meteorological data
- Compliance history forms
- Business assistance
- District rules database
- Air Toxics Program
- Consumer products
- Reformulated Gasoline Program
- Message center
- News releases.

BBSs and Internet home pages are efficient mechanisms for SBTCPs to disseminate information to small businesses, as evidenced by the increasing use of electronic media. Because the Internet and BBSs are also efficient ways to transfer information from the federal SBO and SBAP, between SBAPs, and to the small business community, increased access to the Internet should be pursued by SBAPs.

4.2.3 CAP Activities and Services

32 CAPs were operational during the 1995 reporting period, all of which reported activities. The primary CAP activity, as reported by 17 CAPs, was the review of SBTCP documents. The appointment of staff/election of officers was noted by 15 CAPs.

Major activities of the CAPs during the 1995 reporting period are summarized in Table 4-4. A program summary of CAP activities may be found in Appendix E-11

TABLE 4-4 MAJOR CAP ACTIVITIES		
Activity	# Programs	% Programs
Review SBTCP documents	17	32
Appoint staff/elect officers	15	28
Review of SBO/SBAP outreach efforts	12	23
Define CAP responsibilities	9	17
Review/comment on new regulations, policies, etc.	9	17
Attend training seminars, conferences, etc.	9	17
Assess small business concerns	7	13
Suggest effective outreach activities	5	9
Other ¹	12	23

Note 1: Less frequently-reported CAP activities classified as "other" included:

- Reviewing operational activities, voluntary compliance policies, and grant applications to provide improved small business services.
- Providing advice concerning implementation of SBTCP internal administrative procedures.
- Offering suggestions on leveraging resources through trade associations, vendors, suppliers, and small business trade publications.
- Assessing feedback or interviewing small business persons assisted by SBO/SBAP to determine the effects of the programs.
- Referring small businesses to SBTCP for assistance.
- Reviewing regulatory complexity and financing assistance issues.
- Working to ensure independence of SBO and staff.
- Expanding assistance to media other than air.
- Promoting permit reviews.
- Reviewing and commenting on the effect of state environmental agency confidentiality and multi-media policies on the SBTCP.
- Discussing Small Business Development Center partnerships.

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 effectively and efficiently define the role of the CAP and fully maximize the skills of CAP members in assisting small businesses.

4.2.4 SBO/SBAP/CAP Meetings

As shown in Table 4-5, SBTCPs have recognized the importance of meetings among the three functions to ensure effective coordination of efforts and use of resources. One-half of SBOs and SBAPs have scheduled meetings at least quarterly, and nearly one-half of programs report scheduled meetings among SBOs, SBAPs, and CAPs at least once a year.

TABLE 4-5 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	11			
Weekly	3			
Bi-weekly	4			
Monthly	5	3	2	2
Bi-monthly	1			
Quarterly	4	10	18	7
Semi-annually		1	1	1
Bi-annually	1	1	5	1
Annually		2	2	2
Occasionally	16	8	1	6
TOTAL	45	25	29	19

Meetings between SBOs and SBAPs were the most common form of contact, occurring in 45 programs (85 percent). A majority of these meetings (29 of 45 programs or 64 percent) were regularly scheduled, with frequencies ranging from daily to biannually. The most commonly scheduled frequency of meeting between SBOs

and SBAPs, reported for 11 of the 45 programs (24 percent), was daily (Arizona, Maine, Montana, Nebraska, New Hampshire, North Carolina, South Carolina, Tennessee, and Washington).

Meetings between SBOs and CAPs were reported for 47 percent of programs (25 of 53). The majority of these meetings, 17 of 25 (68 percent), were regularly scheduled. The most common frequency of meetings between SBOs and CAPs was quarterly, reported for 10 of 25 programs, or 40 percent.

29 programs (55 percent) reported meetings involving SBOs, SBAPs, and CAPs. Nearly all of these meetings, 28 of 29 (97 percent), were regularly scheduled, and the common frequency was quarterly, reported for 18 of 29 programs (62 percent).

Meetings between SBAPs and CAPs were least often reported, in only 19 programs (36 percent). Of these, 13 of 19 (68 percent) were regularly scheduled, and the most common frequency was quarterly, reported for 7 of 19 programs (37 percent).

Detailed information, by program, about meetings between SBTCP functions, is presented in Appendix E-12.

4.3 SBTCP FINANCIAL ASSISTANCE PROGRAMS

Information about financial assistance programs offered to small businesses to address environmental compliance needs is provided in Table 4-6.

TABLE 4-6 FINANCIAL ASSISTANCE PROGRAMS		
Type of Assistance	# Programs¹	% Programs
Loan Fund	6	11
Grant	3	6
Loan Guarantee	2	4
Tax Exemption	2	4
Bonds	1	2

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

14 financial assistance programs were offered by 10 of 53 SBTCPs (19 percent) during the 1995 reporting period. 6 SBTCPs have plans to offer financial assistance programs to small businesses in the near future. Detailed information about these financial assistance programs is provided in Appendix E-13.

Only 19 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.

4.4 LEVERAGING OF RESOURCES AND MINIMIZING DUPLICATION OF EFFORTS

Programs reported on the extent to which they leverage resources within their state/territory, as discussed in Section 4.4.1. SBTCP strategies to exchange information and resources with other programs is provided in Section 4.4.2.

4.4.1 Leveraging of Resources

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 leverage resources is shown in Table 4-7. Descriptions of how programs leverage resources for their SBOs, SBAPs, and CAPs may be found in Appendix E-14.

TABLE 4-7 PROGRAMS THAT REPORT LEVERAGING OF RESOURCES FOR SBTCP FUNCTIONS		
	# Programs	% Programs
SBO	35	66
SBAP	43	81
CAP	21	40

35 programs (66 percent) indicate some level of leveraging resources for 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 multi-media information or coordinate outreach with non-air programs to best serve the small business community. Some SBOs also serve in other roles within the state environmental agency.

43 programs (81 percent) indicate some level of leveraging resources for the SBAP function in order to maximize their programs' effectiveness. Strategies and sources of assistance are quite similar to those used by the SBOs.

21 CAPs (40 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. Many CAPs also report receiving a small level of funding for travel and per diem expenses.

4.4.2 Minimizing Duplication of Efforts Among SBTCPs

44 programs (83 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 SBAPs employ to avoid duplication of effort are presented in Table 4-8; program details for this topic are found in Appendix E-15.

TABLE 4-8
SBTCP MECHANISMS FOR AVOIDING DUPLICATION

Mechanism	# Programs	% Programs
Communication with other SBTCPs	37	70
Contact with other SBTCPs within EPA regions	17	32
Review of EPA documents and/or contact with EPA	8	15
Contacts with state and regional air groups	7	13
Review of documents from other sources	6	11
Gathering of information from electronic sources	6	11

The most common technique (in 70 percent of programs) employed by SBAPs to avoid duplication of effort was communication, generally informal, with other SBTCP personnel or review of documents prepared by other SBTCPs. This technique involved contact with counterparts in other programs via the telephone or by networking at events such as conferences and meetings. Discussions of available information and sharing of this information often resulted from these contacts. Mailing lists also were used to facilitate information transfer among SBTCPs.

The second most common method for avoiding duplication was contact, generally formal, with other programs within the same EPA region through conference calls and other means. This technique was utilized during the 1995 reporting period by 17 programs (32 percent).

The use of the Internet for information transfer, although not the most commonly reported method, may be the most promising mechanism for avoiding duplication of effort among SBAPs. Posting of information from the federal SBO and SBAP, other private and university sources, and state SBAPs facilitate efficient use of resources and would encompass all of the mechanisms currently utilized by SBAPs for avoiding duplication.

7 programs (13 percent) reported taking no specific actions to avoid duplication of efforts during the 1995 period.

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. Of special note, the state programs are not required to comply with these Federal statutes; thus actions by the states are either voluntary or may be pursuant to state laws with intents similar to the above-listed Federal statutes.

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, July 1995.
- Conducted educational activities at the Compliance Advisory Panel Training Program, Pittsburgh, PA, October 1995.
- Responded to telephone hotline inquiries in regard to the three statutes.
- Distributed copies of the three statutes by request to state contacts.
- Provided copies of the three statutes with the 1995 SBTCP Reporting Form.

4.5.1 SBTCP Activities Associated with the Paperwork Reduction Act

22 programs (42 percent) reported specific activities associated with the intent of the Paperwork Reduction Act. 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 most common action taken to follow the intent of the provisions of this act was CAP review of SBTCP documents to monitor compliance with this Act. In addition, SBTCPs are working to reduce the number or complexity of permits through the development of general permits for particular industry sectors and by eliminating unnecessary permits through increasing exemptions for "insignificant" activities. Producing concise, easy-to-read documents that summarize regulatory issues also was cited as an effective activity, since these summaries eliminate the need for small

businesses to have copies of full legislative documentation. Overall, these actions show that many SBTCPs have begun taking significant steps during the 1995 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 4-9 and are detailed, by program, in Appendix E-16.

TABLE 4-9 SBTCP ACTIVITIES TO FOLLOW THE INTENT OF THE PAPERWORK REDUCTION ACT		
Activity	# Programs	% Programs
Routine review of documents for compliance	7	13
Receiving/providing documents electronically	5	9
Simplified/consolidated permits and/or forms	5	9
Increasing exemptions for "insignificant" activities	5	9
Use of general industry-specific permits	4	8
Producing concise, easy-to-read summary documents	3	6

4.5.2 SBTCP Activities Associated with the Regulatory Flexibility Act

22 programs (42 percent) reported activities to follow the intent of the provisions of the Regulatory Flexibility Act during 1995, as shown in Table 4-10. 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."

TABLE 4-10 SBTCP ACTIVITIES TO FOLLOW THE INTENT OF THE REGULATORY FLEXIBILITY ACT		
Activity	# Programs	% Programs
Simplified/consolidated permits and/or forms	5	9
Increased exemptions for "insignificant" activities	5	9
Use of general industry-specific permits	4	8
Routine review of documents for compliance	4	8
Amnesty program	4	8
Assessing impact of new regulation, policies, etc.	3	6

SBTCPs have played a major role in ensuring awareness of the effects of regulatory requirements on small businesses. 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. SBTCPs have proven 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-17.

4.5.3 SBTCP Activities Associated with the Equal Access to Justice Act

16 programs (30 percent) reported specific activities to follow the intent of the provisions of the Equal Access to Justice Act, whose purpose 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 by CAPs, the establishment of pro bono legal services, and the availability of funds for engineering services for citizen groups aggrieved by permit actions of a regulatory agency. Although programs mentioned such actions as reductions in the numbers or complexity of permits through the development of general permits for particular industry sectors, and the elimination of unnecessary permits through increasing exemptions for "insignificant" activities, these actions do not adequately address the intent of this Act. The EPA SBO will work with the programs in 1996 to improve their understanding of the Act and to develop appropriate actions towards the intent of the Act.

SBTCP actions to follow the intent of the provisions of the Equal Access to Justice Act are shown in Table 4-11 and detailed, by program, in Appendix E-18.

TABLE 4-11
SBTCP ACTIVITIES TO FOLLOW THE INTENT OF
THE EQUAL ACCESS TO JUSTICE ACT

Activity	# Programs	% Programs
Routine review of documents for compliance	4	8
Increasing exemptions for "insignificant" activities	3	6
Use of general industry-specific permits	3	6
Other ¹	6	11

Note 1: Other actions, taken by 6 programs, to follow the intent of the Equal Access to Justice Act are as follows:

- Making funds available to citizens groups aggrieved by permit actions of a regulatory agency for engineering services.
- Developing and providing information on financial assistance programs to help with capital expenses.
- Facilitating low permit fees for small businesses.
- Minimizing recordkeeping and reporting requirements by developing limits for types of operations cited in an exclusionary rule that defines potential emission sources as actual or by allowing small facilities to use more realistic emissions calculations.
- Establishing pro bono legal services.

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. Complaints 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 BY SBO OR CAP ON SBTCP

43 programs (81 percent) reported that comments were received by their SBOs or CAPs on the SBTCP. Comments were overwhelmingly positive, generally expressing appreciation for the availability of services and the way in which these services were provided. A detailed list of comments received by SBOs and CAPs on their SBTCPs is presented in Appendix F-1.

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

- Appreciation for the availability of a non-regulatory approach to environmental issues (e.g, a feeling of "partnership" in compliance; or "assistance first, enforcement second" rather than an "adversarial" approach.
- Expressions that SBTCP services filled an existing need in the small business community for personalized guidance through the many regulatory processes involved in compliance.

Only 5 programs (9 percent) reported utilizing a formalized approach to gathering and recording feedback from clients served. These programs were: Idaho, Iowa, Minnesota, Tennessee, and West Virginia. Such approaches included:

- Standardized forms to track client evaluations.
- Surveys sent to randomly-selected clients.
- Workshop evaluations.

Attempts to increase the use of formal feedback mechanisms may improve assistance activities by facilitating the reporting of both positive and negative comments. This information then could be used to modify existing activities to better serve the needs of the small business community.

5.2 COMPLAINTS RECEIVED BY SBO OR CAP AND RESOLUTION STRATEGIES

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 complaints or issues raised by small business representatives about SBTCP services and how these issues were resolved. Lessons learned by one program can be shared with other programs, which thereby can benefit from these experiences.

26 programs (49 percent) provided examples of complaints received and resolution strategies employed. 25 programs (47 percent) did not provide information on complaints received. Only 2 programs (4 percent) indicated that specific complaints had not been resolved.

Major themes of the issues reported were:

- A lack of communication between businesses and regulatory agencies.
- Widespread misunderstanding 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).
- The need for programs to assist small businesses in financing pollution control and prevention capital expenses.

Resolution of these issues usually involved SBTCP personnel:

- Providing explanations of regulatory requirements in "plain language."
- Giving one-on-one guidance through the paper work processes.

- Facilitating communication about flexibility issues between businesses and regulatory agencies.
- Investigating, developing, or institutionalizing financial assistance programs.

A list of specific issues addressed by SBOs and CAPs and actions taken to resolve the concerns expressed by the complainants is presented in Appendix F-2.

5.3 PROGRAM HIGHLIGHTS AND ACCOMPLISHMENTS

33 SBTCPs (62 percent) reported on important accomplishments, awards, and recognitions for their work with the small business community.

The SBTCPs have provided the foundation for better synergy between the regulatory agencies and small businesses. Through improved communication and cooperation among SBAPs, programs in such states as Iowa, Louisiana, and Texas have been active in helping train other programs in assisting small businesses. Amnesty programs have been supported through the SBTCPs in New York, Kentucky, and Utah, and these programs have been well received by small businesses that now welcome the opportunity to achieve compliance. Awards also have been tremendous incentives for both small businesses and the individual programs.

In this section, key accomplishments are highlighted based on the frequency in which they were mentioned. An overview of program accomplishments and highlights for 1995 are provided in Appendix F-3.

1. Better synergy between the regulatory agencies and small business was the most common theme, mentioned directly by 26 percent of the programs reporting.
2. Improved cooperation among various SBOs and SBAPs was mentioned by 15 percent of the programs.
 - Iowa has taken part in training other SBAPs through the EPA SBO's Peer Match Program.
 - The Louisiana SBAP has helped many other programs including North Dakota's SBO and SBAP.
 - Texas was awarded a \$25,000 Peer Match Grant to provide training to other programs on how to set-up small business assistance.

3. Awards and grants also have been received by individual programs that have displayed exceptional vision and leadership. 11 percent of the programs reported receiving grants. This funding is valuable in helping not only the program awarded, but also transitions to other programs in term of shared support. Many of the programs that received assistance, including Texas and Louisiana, provided direct support and training to other programs.
 - The Colorado SBAP received the "Customer Service Award" from the Colorado Department of Public Health and Environment.
 - The Florida SBAP presently is coordinating an EPA Leadership Grant with the Florida Small Business Development Centers to provide technical information to a targeted audience.
 - Kansas was awarded a Small Business Leadership Grant in September 1995.
 - The Louisiana Small Business Assistance Program received the "Special Achievement by a Team" award from the secretary of the Department of Environmental Quality in December 1995.
 - Rhode Island's Pollution Prevention Program received recognition and awards from three separate sources: The National Environmental Awards Council in 1990, the Robert Rodale National Environmental Achievement Award in 1991, and a Certificate of Environmental Achievement from Renew America and the National Awards Council for Environmental Sustainability in 1995.
 - Texas received grants totaling \$200,000 in 1995.
4. Awards programs have been effective in providing incentives and role models for small businesses. This was reported by 8 percent of the programs.
 - Arizona's first Annual Small Business Awards Conference was a tremendous success.
 - Montana's SBO helped create a small business environmental awards program.
 - In Utah, the SBO has been actively involved with the Salt Lake Rotary Club's Environmental Committee as Vice Chair. The "Clear the Air" Awards Program for vehicular emissions reduction was initiated in September.
5. SBTCPs found that amnesty programs provide an incentive for small businesses to achieve compliance by eliminating penalties if violations are corrected in a specific time frame. 6 percent of the programs reported active amnesty programs.
 - New York has an amnesty program that eliminates penalties for small businesses that commit to correct violations within 120 days.

- In August 1995, the Jefferson County (KY) Air Pollution Control District approved a pilot amnesty program for small business.
- In Utah, the preliminary results of the small business permit application amnesty program indicates that small businesses welcome the opportunity to achieve compliance.

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

45 SBTCPs (85 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, are shown in Table 6-1 and are detailed, by program, in Appendix G-1.

TABLE 6-1 COMMON COMPLIANCE PROBLEMS		
Compliance Problem	# Programs	% Programs
Not understanding regulatory requirements	22	42
Operating without a permit	19	36
Uncertain of permitting requirements	17	32
Incomplete record keeping	8	15
Financing for control requirements	5	9
Uncertain how to determine emission inventories	5	9
Uncertain how to complete forms	4	8
Operating outside NSPS or MACT	4	8
Improper disposal of hazardous waste	4	8
Fear of arbitrary regulatory enforcement	3	6
Overwhelmed by quantity of regulations	2	4
Lack of sufficient notification by regulatory agency	2	4
No manifest for special or hazardous waste	1	2
Uncertain as to which government agency to contact	1	2
Labeling of storage areas	1	2
Need for multi-media permits	1	2

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

- Concerns about the amount of time required to prepare permits applications and to maintain records.
- Fear that regulatory enforcement will be arbitrary and capricious.
- Difficulty in completing required mathematical calculations to determine the Potential to Emit (PTE).
- Not having an operation permit for an air contamination source.
- Not understanding the requirements of an operation permit.
- Not maintaining records to document emissions.
- Not being aware of environmental requirements at state and federal levels.
- Lack of sufficient notification by regulatory agencies.
- Difficulty of small business obtaining a clear and straightforward answer from the regulatory agency about what is needed to achieve compliance.
- Difficulty in obtaining answers from regulatory agencies, as lines are often busy and at times regulatory staff do not return calls.
- Fear that talking to regulators will cause a small business to be targeted for additional scrutiny by the regulators.
- Unavailable regulator flexibility for special conditions including small emitters and companies manufacturing specialty products.
- Frustration with the multiple layers of regulatory requirements.
- Incorrect assumption by small businesses that if they apply for and are issued one permit, then they are in compliance with all requirements.

6.2 IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE

Programs reported on their observations of 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.

45 programs (85 percent) provided insight as to improvements in regulatory understanding and compliance. The most common responses, listed by number and percentage of programs, are provided in Table 6-2 and are detailed, by program, in Appendix G-2.

TABLE 6-2 IMPROVEMENTS IN REGULATORY UNDERSTANDING		
Response	# Programs	% Programs
More open communication between sources and agencies	26	49
Increased compliance	23	43
Greater understanding of regulations	20	38
Reduced apprehension of regulatory agencies and environmental compliance	18	34
Improved attitude about compliance	17	32
Businesses including compliance strategies early in their business plans	9	17
Increased registration and permitting of existing sources	5	9
Better record keeping	5	9
Improvements in pollution prevention practices	5	9
Promotion of compliance through on-site visits	3	6
Recycling and reuse	1	2
Better hazardous waste disposal	1	2

Generally, 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; 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 top three most common compliance problems mentioned by small businesses, "Not understanding regulatory requirements", and

"Operating without a permit", were represented positively by facilities as compliments to program effectiveness, with programs reporting "Greater understanding of the regulations," and "Increased compliance." This indicates that the SBTCPs are working to understand the small business community and provide quality service where it is most needed.

A majority of the programs reported that the most notable improvements in compliance have been a result of on-site visits. Many of the businesses visited by the SBAP were not aware of regulations or pollution prevention opportunities and were eager to be given a chance to comply without the threat of enforcement action. Seminars and publications were valuable, but not as effective as site visits. The SBAP has found it more difficult to establish relationships with small businesses through seminars than with direct personal contact.

The toll-free hot line has been an efficient tool for the SBAPs. Much of the initial contact between the SBAP and small business owners occurs at this level. The SBAP often makes telephone contact several times with a small business before being invited to make a site visit. This resource management tool ensures that on-site visits are used in the most effective manner to help assist facilities that have the greatest need.

Two programs, Iowa and Texas, have developed mechanisms to track compliance as a result of their outreach efforts. The following examples provide statistics that reflect an improvement in compliance.

- Iowa reported a significant increase in compliance for targeted processes such as spray painting. Nearly all auto body shops in the state are now aware that permits are required, and about 500 have been introduced to the state permit-by-rule option. This has resulted in about 500 fewer permit applications that need to be processed. An improvement in compliance exists as a result of on-site activities because clients are provided with assistance until they are in compliance or until they chose to remain out of compliance.
- Texas provided data on how site visits resulted in an increase in regulatory compliance in organic finishing processes. Compliance was measured at the beginning of the site visit using checklists, and compliance was measured again after the visit. The following improvements in compliance were measured:
 - Spray booths: 3 percent increase (from 90 to 93 percent)
 - Gun cleaners: 6 percent increase (from 82 to 88 percent)

- High-volume Low-pressure (HVLP) guns: 5 percent increase (from 92 to 97 percent)
- Prep areas: 14 percent increase (from 73 to 87 percent)
- Low VOC solvents and paints: 32 percent increase (from 36 to 69 percent)
- Stack: 31 percent increase (from 62 to 93 percent)

The following two example responses from New York and Ohio reflect the general sentiment of many of the programs.

- The State of New York wrote, "SBTCP plays an important role in helping the regulator to understand the value and needs for compliance assistance in conjunction with an enforcement element rather than solely an enforcement/penalty approach to achieving compliance."
- The State of Ohio provided insight into the SBAP experience in helping businesses, "It is important to stress that these businesses are asking for help because they want to be in compliance with environmental regulations, but have been afraid to look closely for fear of what they might find. This fear is very rarely based upon an actual personal bad experience with the regulating agency; more often, it is based on industry legend, or stories about what happened to a similar operation. The businesses visited to date are pleasantly surprised that they have stumbled upon a government program which can be of immediate and direct benefit to them."

6.3 RECOMMENDED CHANGES TO FACILITATE SMALL BUSINESS COMPLIANCE WITH THE CAA

Recommendations made by 44 SBTCPs for changes, at the state or federal level, that would 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 responses, grouped by category and listed by program, may be found in Appendix G-3.

**TABLE 6-3
SBTCP RECOMMENDATIONS FOR IMPROVING COMPLIANCE**

Recommendation	# Programs	% Programs
Flexibility in applying regulations to small businesses	16	30
Multi-media pollution control and compliance assistance	14	26
Increased funding / continued adequate funding	13	25
Mechanisms for financing pollution control equipment	12	23
Generic outreach and training materials	9	17
Use of Internet for information transfer	5	9

83 percent of all of programs (44) provided at least one recommendation for changes to improve small business compliance with the CAA. The recommendations most commonly offered by SBTCPs mirror many of the ideas presented as response actions to the Paperwork Reduction, Regulatory Flexibility, and Equal Access to Justice Acts, and represent concerns expressed by small business people to SBTCP personnel. Several of these recommendations reflect dominant themes repeated in data relating to SBO/SBAP outreach activities, CAP activities, comments from small businesses, methods of avoiding duplication, and responses to the above-mentioned regulatory Acts. Major issues addressed through technical assistance include the application of regulations to small businesses in a flexible manner and the development of financing mechanisms to assist in the purchase of pollution prevention/control equipment.

Another common recommendation stressed by SBTCPs (26 percent of programs) involves the expansion of technical assistance into a multi-media effort, addressing small business concerns about groundwater, soil, and hazardous waste issues.

Generic outreach and training materials, developed on a national level and distributed to individual programs, represent an effective means of utilizing the limited program resources to the maximum benefit of small businesses. Federally-produced assistance materials, prepared for common industry sectors or commonly-experienced compliance problems, could be used by multiple SBTCPs with minimal modifications. This would be a time-and cost-effective way of providing the best possible technical assistance information to the most small businesses at the lowest cost. Combining this suggestion with the recommendation of further utilizing the potential of the Internet

(by providing access to these materials electronically) increases the efficiency of this approach.

6.4 PROGRAM CONFIDENTIALITY

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.

47 programs (89 percent) report no problems with COI or confidentiality issues. 3 programs (6 percent) indicate that no confidentiality program or guarantee of confidentiality is in place. (3 programs did not respond to the question.)

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 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).

- To maintain confidentiality, businesses can work through the Ombudsman's office, which is placed under the Director of the Alabama Department of Environmental Management and not under any regulatory divisions. When SBO staff receive a call for information and go to the regulatory divisions for answers, it is understood that the source of these questions is to be kept confidential unless there is an imminent threat to public health or the environment.
- Connecticut's program does not offer confidentiality and probably never will. The State has a liberal Freedom of Information Act that provides for only a few limited exceptions to the general policy of disclosing governmental documents.

CT's program works closely with other service providers, some of which do offer confidentiality. In situations where confidentiality is an issue, the SBTCP refers clients to programs within the state that do offer confidentiality...

The SBTCP is working to establish a policy/protocol with the Air Bureau's Enforcement Division to provide some level of predictability for small businesses seeking assistance. This policy/protocol likely will take the form of a Compliance Assistance Agreement that provides for delivery of technical assistance as part of the Air Bureau's Enforcement Response Policy. CT's Regulations of Connecticut State Agencies provide for confidentiality exceptions for company trade secrets.

- SBAP is under contract, which states that specific information regarding businesses (such as name, specialty, specific nature of inquiry, or other trade information) will not be reported to the regulatory agency; only numbers by type (SIC codes) are reported. The Kansas Ombudsman (Public Advocate) has the approval by the Division Director and Bureau Directors to keep information confidential. Confidentiality has not been an issue.
- As structured, the North Dakota SBAP and SBO may not appear to be free of COI. Although the SBAP staff are part of the permit section, which is separate from the compliance section, it is difficult to know whether small businesses may be reluctant to request assistance from SBAP, since the SBAP staff are part of the air pollution control regulatory program. Also, it is unknown whether small businesses are reluctant to request assistance or confide in the SBO, since the Ombudsman is housed within and employed by the Department of Health...

With respect to confidentiality, 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 as confidential and not disclosed to, or sought to be disclosed from, the SBAP. Information disclosed by small businesses directly to SBAP staff is not turned over to the compliance program staff for enforcement purposes; however, it is expected that a plan for correcting any violations will be developed. When needed, compliance assistance will be provided from the SBAP.

It is the SBAP's and SBO's position that confidentiality (disclosure of violations to enforcement staff) is really a non-issue in North Dakota.

APPENDIX A

1995 ANNUAL REPORTING FORM

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

**ANNUAL REPORTING FORM
FOR THE PERIOD 1/1/95 TO 12/31/95**

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

INSTRUCTIONS FOR COMPLETING THIS FORM

Provided on the enclosed computer disk is a blank copy of the Annual Reporting Form for the State Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP). 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 first report is January through December 1995.

The blank form on the enclosed disk is provided in two commonly available word processing formats: WordPerfect 5.1 (SBTCP95.WPF) and Microsoft Word (SBTCP95.MSW). Additionally, Table 3-1 is provided in a spreadsheet format in Lotus123 (TABLE3-1.WK3) and Microsoft Excel (TABLE3-1.XLS).

Please answer the questions on this Form, and return the disk and a hardcopy of the Reporting Form using the enclosed, pre-addressed mailer.

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

**Ms. Karen V. Brown
Small Business Ombudsman
U.S. Environmental Protection Agency (1230C)
401 M Street, SW
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 January 31, 1996. Please note that this is a new date.

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. 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.

(703) 305-5938 (Telephone)
(800) 368-5888 (Toll-free Hotline)
(703) 305-6462 (Facsimile)

WHY ARE WE REQUESTING THIS FORM?

As part of the Clean Air Act Amendments of 1990 (CAAA), 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. Providing the Form as a blank word processing document on a computer disk is intended to reduce the time required to prepare the Form and to assist EPA's SBO efforts to compile the information from each state and prepare the report to Congress.

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.

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 of each state SBTCP. This report is not meant to be an evaluation of any facet of your program.
- The period covered by this report is January through December 1995.
- We are seeking information you should be already collecting for your 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.
- 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.

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		

SECTION 2

ORGANIZATION, STAFFING, OPERATIONS, BUDGET

This section is designed to collect four types of standardized information about your state's SBTCP, including: Organizational Structure, Staffing Levels, Operations, and Budget.

ORGANIZATION

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	

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

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 2.4. In the case of the SBO, for example, some states have located this component within the Department of Commerce. Generally, the CAP is located outside of all agencies, with each individual appointed as defined in Section 507.

SBTCP COMPONENT	BRIEF DESCRIPTION OF LOCATION
SBO	
SBAP	
CAP	

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

If YES, please complete Question 2.5. If NO, please skip to Question 2.6.

YES	
NO	

2.5 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 1995. 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)	
Budget During the Current Reporting Period	
Term of Contract	

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 1995. 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 (as FTEs)	

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

Please complete this question for the staffing levels that are current as of December 1995. Use the same definition for an FTE as discussed in Question 2.6.

SBAP Function	Number of FTEs
All Staff	

2.8 With respect to the SBAP, how many of these people are paid or serve as (un-paid) volunteers?

Please complete this question based on the information in Question 2.7, also reporting the results as FTEs. The total should be the same as the total number of FTEs in Question 2.7.

SBAP Staff	Number of FTEs
Paid	
Un-paid Volunteers	

2.9 How many of the people identified in Question 2.7 would be considered retired engineers?

Please complete this question based on the information in Question 2.7, also reporting the results as FTEs. We are interested in knowing if the states are utilizing "retired engineer" programs (or their equivalent) to support the SBAPs.

SBAP Staff	Number of FTEs
Retired Engineers	

2.10 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 1995. 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 1995.

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)	

OPERATIONS

2.11 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	

2.12 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.

BUDGET

2.13 Please provide summary information on the funding for each component of your state's SBTCP (for the period January through December 1995). 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.

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

2.14 What was the SBTCP's budget during the previous reporting period (prior to January 1995)? What is the expected SBTCP budget during the next reporting period (January through December 1996)?

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 the previous reporting period, please complete this question with such words as inactive or did not exist.

	BUDGET DURING PREVIOUS REPORTING PERIOD (\$)	EXPECTED BUDGET FOR NEXT REPORTING PERIOD (\$)
SBO		
SBAP		
CAP		

2.15 Briefly describe any significant changes (more than 10%) in the level of funding between the previous, current, and the next 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.

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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.

SMALL BUSINESS OMBUDSMAN

3.1 Does your state's SBO have a toll-free Hotline?

YES	
NO	

If YES, is the hotline number accessible nationally or in-state only?

National	
In-state only	

If YES, please list this number.

--

3.2 Briefly describe the state SBO's outreach program.

With this question we are interested in compiling statistics on the types and number of people reached through a variety of outreach activities by the SBO, such as meetings with trade associations, speeches, mailings, etc. during the 1995 reporting period.

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 "DID THIS ACTIVITY OCCUR" column.

OUTREACH ACTIVITY	DID THIS ACTIVITY OCCUR? (YES OR NO)	NUMBER OF OCCURRENCES DURING REPORTING PERIOD	NUMBER OF PEOPLE REACHED
Meetings			
Speaking Engagements			
Brochures/Flyers			
Training Sessions			
Others (please specify)			

3.3 Please indicate the number of meetings that occurred between the CAP, SBAP, and SBO during the 1995 reporting period.

We are interested in comparing how much communication occurred between the different components of each state SBTCP during the 1995 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, or occasional)
SBO and SBAP		
SBO and CAP		
SBO and CAP and SBAP		
SBAP and CAP		

SMALL BUSINESS ASSISTANCE PROGRAM (SBAP)

3.4 What assistance services are offered by your state's SBAP?

This question requests the most detailed information of your state's SBTCP.

At a minimum, we would like to compile a list of the services offered by your state's SBAP. The table below lists these services. Please check those boxes that apply, list additional services as appropriate and, if possible, indicate the number of services provided, and/or individuals/businesses reached.

Preferably, but only if you are maintaining such statistics, we would like to compile the number of businesses helped/reached by the SBAP's services (e.g., general assistance via telephone, letters, etc.; on-site consultations; seminars/workshops/meetings/etc.; distribution of factsheets/manuals/information packets/etc.) by three-digit Standard Industrial Classification (SIC) codes. Please complete Table 3.1, which is attached. Computer copies of this table are provided in both Lotus123 (TABLE3-1.WK3) and Excel (TABLE3-1.XLS) formats.

ASSISTANCE SERVICE	SERVICE PROVIDED? (YES OR NO)	# OF SERVICES PROVIDED DURING THE REPORTING PERIOD	# OF INDIVIDUALS OR BUSINESSES REACHED
GENERAL ASSISTANCE			
ON-SITE VISITS			
SEMINARS, WORKSHOPS, MEETINGS, ETC.			
FACTSHEETS, MANUALS, INFORMATION PACKETS			
OTHERS (please specify)			

3.5 Does your state's SBAP have a telephone Hotline?

YES	
NO	

If YES, is this a toll-free number?

YES	
NO	

If YES, is the number accessible nationally or in-state only?

National	
In-state only	

Please list the number.

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3.6 Does the SBAP conduct on-site consultations?

YES	
NO	

3.7 Did your SBAP conduct seminars, workshops, or make any presentations during the reporting period?

YES	
NO	

3.8 Did your SBAP prepare and distribute any fact sheets, information packets, manuals, or other printed materials during the 1995 reporting period?

YES	
NO	

NOTE: If available, please include a list of documents, that were prepared and distributed by your SBTCP during the 1995 reporting period.

3.9 Does the SBAP program services include an electronic bulletin board?

YES	
NO	

If YES, what is the address of the bulletin board?

--

Please list what information is accessible through this bulletin board.

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	Please check all appropriate boxes
Copies of Regulations	
Information on P2 options	
Others (please specify)	

If your SBAP has an electronic bulletin board, please indicate, if available, its level of usage (i.e., how many times was it accessed during the 1995 reporting period)?

--

Was it helpful?

With this question, we are asking if you have received ANY comments from the bulletin board 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.

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3.10 How does your state SBAP avoid duplication of efforts among other state SBTCPs?

With this question, we are hoping to find out to what extent states are sharing/exchanging information with other state SBTCPs. For example, what factsheets or information packets were developed by another state and used (with minimal editing) in your state?

COMPLIANCE ADVISORY PANEL

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

For example, the CAP may have: reviewed documents for readability, assessed small business concerns, reviewed technical assistance outreach efforts by the SBTCP, established procedures, or appointed a chairperson.

3.12 Please briefly describe what actions were initiated by the SBTCP/CAP regarding compliance of the SBTCP with the general principles 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 for compliance with these three federal acts. To help you, hard copy summaries of these three acts have been included with this Annual Reporting Form.

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 CAP or SBO 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 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 1990 CAAA.

YES	
NO	

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

--

If YES, please indicate the funding levels for each grant or loan program.

NAME OF GRANT OR LOAN PROGRAM	FUNDING LEVEL

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

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

SECTION 5 OTHER INFORMATION

- 5.1 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 6 COMPLIANCE ASSURANCE

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

6.1 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 1995?

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 than 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 add additional lines to this table as needed.

[illegible]

6.2 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.

6.3 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.

This is the end of the SBTCP Annual Reporting Form. Thank you, and all contributors, to the completeness and accuracy of your state's Report. A copy of the EPA 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 (1230-C)
WASHINGTON, DC 20460
800-368-5888
703-305-5938 (in DC area)
703-305-6462 (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 45 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 25 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
703-305-5938 (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 1,100 - 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 facie 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 1995, the SBO reviewed and monitored 22 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 1995

The SBO's efforts to assist the small business community continue at a high level. Key accomplishments and activities for 1995 (some of which are on-going) include:

- Hosted second National Small Business Ombudsman and Technical Assistance Conference attended by 47 states and 2 territories (200 participants).
- Developed external stakeholder guidance and acted as a principal participant in the Agency's fourth 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 Administrator, Deputy Administrator, and four Assistant Administrators to discuss small business issues.
- Issued first environmental auditing newsletter entitled, "Small Talk," with a small business focus in cooperation with the University of Maryland at Baltimore and the Institute of Environmental Auditing.
- Was EPA link to the White House Conference on Small Business, and continue to work with the EPA senior managers and Small Business Administration to implement conference recommendations made to EPA.
- Developed small business regulatory impact studies for several small business trade associations.
- Participated as a key player in the joint Small Business Administration and Office of Management and Budget Regulatory Reform Initiative.
- Completed, with the University of Tennessee's Industrial Services Center and the EPA Office of Air Quality Planning and Standards, a Third National Satellite Teleconference on chromium electroplating.
- Implemented a grant for the development of on-site environmental auditing and assessment education and training materials for February 1996 field testing.
- Issued a grant for the development of materials and participated in a state Compliance Advisory Panel training program. This training program was conducted by the grantee in October 1995.
- Conducted EPA Small Business Regional Liaison's Annual Conference in August 1995.
- Served as advocate for small businesses in activities of EPA's Permit Improvement Team.

APPENDIX C

FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM

APPENDIX C 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 Control Technology Center (CTC) within the Information Transfer Group of the Office of Air Quality Planning & Standards (OAQPS).

FEDERAL SBAP ACTIVITIES

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. One example is the SBAP Bulletin Board System (BBS) on the OAQPS Technology Transfer Network (TTN), which became operational in December 1995. This system was developed to assist the state SBAPs with communications and information sharing; it includes a list of state and EPA small business contacts and programs, and provides an avenue to share information and outreach materials developed specifically for small businesses. As of March 1996, the SBAP BBS has over 1,600 accesses, with 28 percent of the users representing state or local SBAPs. A total of almost 500 documents have been downloaded from this system. At present, there are about 70 to 75 unique users and 30 to 35 items being downloaded each week.

In addition to the SBAP BBS, the TTN also provides access to the Clean Air Act Amendments (CAAA) BBS, which provides access to proposed and final rules, background and guidance documents, plain-English fact sheets, as well as implementation strategy updates and schedules. TTN access may be obtained by calling 919-541-5742 (for modems up to 14,400 bps), and communications parameters set as follows:

- 8 data bits
- N parity
- 1 stop bit
- terminal emulation of VT100 or VT/ANSI
- full duplex.

Also recently available is the SBAP Home Page on the Internet World Wide Web. This Web site provides access to EPA small business assistance information and materials, as well as pointers to other Web sites that relate to small business issues. The SBAP Home Page address is: <http://www.epa.gov/oar/oaqps/sbap.html>.

Plain English Guidance Materials

The Federal SBAP is preparing materials for use by the states to explain new EPA CAAA rules in plain English. These items include short, introductory brochures and more detailed guidebooks that contain information on options for compliance (including pollution prevention measures), sample reporting and recordkeeping forms, and example calculations. The materials are distributed to all state programs in both hard copy and electronic format; this allows them to customize the items and reproduce as many as needed.

The materials for the Halogenated Solvent Cleaning and Chromium Electroplating and Anodizing CAAA rules were completed in May 1995. In addition to those distributed by the state programs, almost 500 hard copies have been distributed directly by the Federal SBAP, and over 1,300 electronic copies have been downloaded from the OAQPS TTN. Guidance materials for the Wood Furniture Manufacturing CAAA rule are expected to be completed by Summer 1996.

Satellite Seminars

The Federal SBAP is working with EPA's Small Business Ombudsman and OAQPS's Education and Outreach Group through a grant with the University of Tennessee to present a series of *satellite downlink seminars* to educate small businesses on new EPA air regulations. Broadcast statistics are shown in Table 1.

TABLE 1 SATELLITE DOWNLINK SEMINARS			
Date	Topic	# Participants	# Sites
May 1994	Dry Cleaning	3,000	197 sites in 48 states 1 site in Canada 2 sites in Mexico
May 1995	Degreasing	1,300	101 sites in 45 states 1 site in Canada 2 sites in Mexico
November 1995	Chromium Electroplating	2,000	140 sites in 43 states

A similar broadcast for Wood Furniture Manufacturing is scheduled for September 1996.

Annual Conference

An annual SBO and SBAP Conference is held by EPA (co-sponsored by OAQPS's Federal SBAP and the EPA SBO). The purpose of this conference is to facilitate communication

among the states about issues they face in the implementation and operation of their programs and to communicate with EPA staff concerning regulatory and policy developments affecting small businesses. The 1995 meeting was held on January 25-27, in New Orleans, Louisiana, with over 150 attendees representing 47 states and 2 territories. The 1996 meeting was held on February 28 March 1 in San Diego, California, with 150 attendees from 44 states and 2 territories, as well as representatives of many small business industry associations.

Leadership Grants

In September 1995, the Federal SBAP awarded the "Leadership Grants to State CAAA Small Business Centers," funded through the Environmental Technology Initiative. This one-time program provided \$1.5 million for ten model small business assistance projects in 15 states. These grants will assist in the development of model programs and activities that strive to attain the goals of pollution prevention as the preferred approach, integrate with existing technical and small business assistance providers, and offer cross-media technical and compliance assistance. The objective of the Leadership Grant Program is to learn from the experiences of the awarded centers so as to develop models that can demonstrate to others effective ways of providing such assistance to small businesses. A list of the awarded projects, and contacts for each is shown in Table 2.

TABLE 2 LEADERSHIP GRANT PROJECTS	
Project Title	Contact
Coordinated Compliance and Pollution Prevention Assistance for Small Businesses with Metal Finishing Operations	Tracy Babbidge Connecticut Department of Environmental Protection 79 Elm Street Hartford, CT 06106 203-424-3382
Model Project to Deliver Compliance and Pollution Prevention Technical Assistance to Small Businesses Through an On-line Computer System	Richard Rasmussen VA Department of Environmental Quality P.O. Box 10009 Richmond, VA 23240-0009 804-762-4020
Development of Multi-media Assistance Through Small Business Development Centers	Joseph Schlessel Small Business Assistance Program FL Department of Environmental Protection 2600 Blair Stone Road Tallahassee, FL 32399-2400 904-488-1344
Support Compliance Assistance and Pollution Prevention in the Wood Finishing Industry	Leo Raudys Small Business Assistance Program MN Pollution Control Agency Air Quality Division 520 Lafayette Road St. Paul, MN 55155 612-297-2316

**TABLE 2
LEADERSHIP GRANT PROJECTS**

Project Title	Contact
Establish Comprehensive Management System to Enable Small Businesses to Determine Environmental Costs	<p><i>For Accounting System Work and Regulation Trigger Manual:</i> Kerry Drake TX Natural Resource Conservation Commission P.O. Box 13087 Austin, TX 78711-3087 512-239-1112</p> <p><i>For Support Documents for the Environmental Management System:</i> Lany Weaver NM Small Business Assistance Program 1190 St. Francis Drive P.O. Box 26110 Santa Fe, NM 87502-6110 505-627-0043</p> <p><i>For Measurement System to Assess the Amounts of Pollution Avoided or Reduced:</i> Kyle Arthur OK Department of Air Quality 1000 N.E. Tenth Street Oklahoma City, OK 73711-1212 405-271-1400</p>
Establish Industrial Mentor-Protege Partnership	Robert Graham AR Department of Pollution Control and Ecology 8001 National Drive P.O. Box 8913 Little Rock, AR 72219-8913 501-562-7444
Develop Series of Environmental Training Modules for Small Business Representatives	Janet Neff KS Department of Health and Environment Office of Pollution Prevention Forbes Field, Building 283 Topeka, KS 66620-0001 913-296-0669
Partnership for Compliance Through Multi-media Environmental Outreach and Management	Tamara Wharton UT Department of Environmental Quality Division of Air Quality Small Business Ombudsman 150 North 1950 West P.O. Box 144840 Salt Lake City, UT 84116-3085 801-536-4231

Pollution Prevention

EPA's Pollution Prevention Division, as part of their role in the Federal SBAP, is coordinating with the National Pollution Prevention Roundtable to assist states in working with their existing pollution prevention programs to help small businesses.

Chemical Accident Prevention

The Chemical Emergency Preparedness and Prevention Office is preparing materials to help states incorporate chemical accident prevention into their programs.

CONTROL TECHNOLOGY CENTER

Affiliation with the CTC provides Federal SBAP "customers" with ready access to EPA information and expertise through services such as:

- CTC Hotline: 919-541-0800
- Technical Guidance Materials: documents and software
- CTC News: quarterly newsletter that includes a "Small Business Update" section for Federal SBAP news and activities.

Further information may be obtained from Deborah M. Elmore, Federal SBAP Coordinator, EPA/OAQPS at:

- 919-541-5437 (telephone)
- 919-541-0242 (fax)
- elmore.deborah@epamail.epa.gov (e-mail).

APPENDIX D

SBTCP STATUS, BUDGETS, STAFFING AND ORGANIZATION

**TABLE D-1
PRIMARY AND ALTERNATE CONTACTS
FOR 1995 SBTCP REPORT**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Alabama	Blake Roper, Ombudsman AL Department of Environmental Management P.O. Box 301463 1751 Congressman W.L. Dickinson Drive Montgomery, AL 36130-1463 334-271-7925 334-271-7950 fax	Mike Sherman or Jim Moore Chief, Light Industrial Section AL Department of Environmental Management P.O. Box 301463 1751 Congressman W.L. Dickinson Drive Montgomery, AL 36130-1463 334-271-7861 334-279-3044 fax
Alaska	Priscilla P. Wohl, Compliance Assistance Manager SBAP Advocate Department of Environmental Conservation Compliance Assistance Section 555 Cordova Street Anchorage, AK 99501 907-269-7591 907-269-7600 fax	Scott Lytle, SBAP Program Manager Department of Environmental Conservation Compliance Assistance Section 555 Cordova Street Anchorage, AK 99501 907-269-7500 907-269-7600 fax
Arizona	Martin Todd Dorris, Technical Assistance Manager Small Business Ombudsman AZ Department of Environmental Quality 3033 N. Central Avenue Phoenix, AZ 85012 602-207-4337 602-207-4872 fax	
Pinal County	Donald P. Gabrielson, Director SBAP Director/SBO Pinal County Air Quality Control District P.O. Box 987 Florence, AZ 85232 520-868-6760 520-868-6754 fax	

**TABLE D-1
(Continued)**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Maricopa County	Richard Polito, Program Manager SBEAP Maricopa County SBEAP Environmental Services Department 2406 S. 24th Street, Suite C-106 Phoenix, AZ 85034 602-506-5102 602-506-6669 fax	Greg Workman, Environmental Engineer SBEAP Maricopa County SBEAP Environmental Services Department 2406 S. 24th Street, Suite C-106 Phoenix, AZ 85034 602-506-5149 602-506-6669 fax
Pima County & Tucson	John A. Bernardo, Program Manager Pima County Department of Environmental Quality 130 W. Congress Street 2nd Floor Tucson, AZ 85701-1317 520-740-3342 520-882-7709 fax	David M. Esposito Pima County Department of Environmental Quality 130 W. Congress Street 3rd Floor Tucson, AZ 85701-1317 520-740-3340 520-882-7709 fax
Arkansas	Robert Graham, Ombudsman Pollution Control and Ecology 8001 National Drive P.O. Box 8913 Little Rock, AR 72219 501-682-0708 501-682-0707 fax	Elizabeth Boggs, Service Representative Small Business Assistance Program Pollution Control and Ecology 8001 National Drive P.O. Box 8913 Little Rock, AR 72219 501-682-0709 501-682-0707 fax
California	Jim Schoning, Ombudsman California Air Resources Board 2020 L Street Sacramento, CA 95814 916-323-6791 916-323-2393 fax	Jon E. Pederson, Air Pollution Specialist California Air Resources Board 2020 L Street Sacramento, CA 95814 916-322-2825 916-322-3906 fax

TABLE D-1
(Continued)

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Colorado	Jocelyn Mills, Small Business Ombudsman Office of Regulatory Reform 1560 Broadway, Suite 1530 Denver, CO 80202 303-894-7826 303-894-7834 fax	Nick Melliadis, SBAP Coordinator Small Business Assistance Program CO Department of Public Health and Environment Air Pollution Control Division 4300 Cherry Creek Drive, S Denver, CO 80222-1530 303-692-3175 303-782-5493 fax
Connecticut	Tracy Babbidge, Small Business Ombudsman CT DEP 79 Elm Street Hartford, CT 06106 860-424-3382 860-424-4063 fax	Kristen Cohen, Environmental Analyst CT DEP 79 Elm Street Hartford, CT 06106 860-424-3548 860-424-4063 fax
Delaware	George Petitgout, Ombudsman Department of Natural Resources & Environmental Control P.O. Box 1401 Dover, DE 19903 302-739-6400 302-739-6242 fax gpetitgout@dnrec.state.de.us	Phil Cherry, Director, Business and Permitting Department of Natural Resources & Environmental Control P.O. Box 1401 Dover, DE 19903 302-739-6400 302-739-6242 fax pcherry@dnrec.state.de.us
District of Columbia	Henry Lopez, Ombudsman DCRA 2100 Martin Luther King, Jr. Avenue, SE Room 203 Washington, DC 20020 202-645-6617 x3087 202-645-6622 fax	Olivia Achuko, Environmental Engineer DCRA 2100 Martin Luther King, Jr. Avenue, SE Room 203 Washington, DC 20020 202-645-6617 x3017 202-645-6102 fax

**TABLE D-1
(Continued)**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Florida	Joseph H. Schlessel, Ombudsman FL Department of Environmental Protection MS 5505 2600 Blair Stone Road Tallahassee, FL 32399 904-488-1344 904-922-6979 fax	
Georgia	Marvin M. Lowry, Ombudsman/Program Manager DNR/EPD/Air Protection 4244 International Parkway Suite 120 Atlanta, GA 30354 404-363-7020 404-363-7100 fax	Anita Dorsey-Word, Coordinator DNR/EPD/Air Protection 4244 International Parkway Suite 120 Atlanta, GA 30354 404-362-4842 404-363-7100 fax
Hawaii	Robert Tam, EHS III Clean Air Branch P.O. Box 3378 Honolulu, HI 96801 808-586-4200 808-586-4370 fax	Wilfred Nagamini, Program Manager Clean Air Branch P.O. Box 3378 Honolulu, HI 96801 808-586-4200 808-586-4370 fax
Idaho	Doug McRoberts, Policy Analyst SBO Division of Environmental Quality 1410 North Hilton Boise, ID 83706 208-373-0497 208-373-0169 fax	

**TABLE D-1
(Continued)**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Illinois	Don Squires, Ombudsman Illinois EPA 2200 Churchill Road P.O. Box 19276 Springfield, IL 62794-9276 217-785-1625 217-782-9039 fax	Mark Enstrom, SBAP Manager IL Department of Commerce & Community Affairs 620 East Adams Street Third Floor Springfield, IL 62701 217-524-0169 217-785-6328 fax
Indiana	Rainford Hunter, Senior Environmental Manager Small Business Assistance Liaison Indiana Department of Environmental Management 150 W. Market Street, Suite 703 P.O. Box 6015 Indianapolis, IN 46206-6015 317-233-0726 317-233-5627 fax	Steve Rogers, Director, Office of Business Relations Small Business Ombudsman Indiana Department of Environmental Management 100 N. Senate Avenue P.O. Box 6015 Indianapolis, IN 46206-6015 317-232-8598 317-232-8564 fax
Iowa	John Konefes, Director, Iowa Waste Reduction Center Iowa Waste Reduction Center 75 BRC University of Northern Iowa Cedar Falls, IA 50614-0185 319-273-2079 319-273-2926 fax	Mark Trapani, Manager, Iowa Air Emissions Assistance Program Iowa Waste Reduction Center 75 BRC University of Northern Iowa Cedar Falls, IA 50614-0185 319-273-2079 319-273-2926 fax
Kansas	Janet E. Neff, Public Advocate Ombudsman KS Department of Health and Environment Building 283, Forbes Field Topeka, KS 66620 913-296-0669 913-291-3266 fax	Theresa Hodges, Director, Office of Pollution Prevention KS Department of Health and Environment Building 283, Forbes Field Topeka, KS 66620 913-296-6603 913-291-3266 fax

TABLE D-1
(Continued)

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Kentucky	Rose Marie Wilmoth, Air Quality Ombudsman Natural Resources & Environmental Protection Cabinet Office of the Secretary 5th Floor, Capital Plaza Tower Frankfort, KY 40601 502-564-3350 502-564-3354 fax	Patti R. Kirk, Deputy Commissioner Department of Community Development Economic Development Cabinet Capital Plaza Tower, 23rd Floor Frankfort, KY 40601 502-564-7140 502-564-3256 fax
Louisiana	Johnny Dykes, Ombudsman Governor's Office P.O. Box 94004 Baton Rouge, LA 70804-9004 504-922-3252 504-922-3255 fax	Victor Tompkins, SBAP Program Manager Department of Environmental Quality P.O. Box 82135 Baton Rouge, LA 70884-2135 504-765-0102 504-765-0921 fax
Maine	Brian Kavanah, Coordinator, SBTAP Maine DEP Station 17 Augusta, ME 04333 207-287-6188 207-287-2814 fax	Ron Dyer, SBO Maine DEP Station 17 Augusta, ME 04333 207-287-4152 207-287-2814 fax
Maryland	Linda B. Moran, Program Coordinator Maryland Department of the Environment Small Business Assistance Program 2500 Broening Highway Baltimore, MD 21224 410-631-3165 or 800-433-1247 410-631-5165 fax	John Mitchell, Small Business Ombudsman Maryland Department of the Environment OPICA 2500 Broening Highway Baltimore, MD 21224 410-631-3000 410-631-3936 fax

**TABLE D-1
(Continued)**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Massachusetts	George Frantz, SBAP Manager Executive Office of Environmental Affairs Office of Technical Assistance for Toxics Use Reduction 100 Cambridge Street, #2109 Boston, MA 02202 617-727-3260 x631 617-727-3827 fax	John Raschko, Special Projects Manager Executive Office of Environmental Affairs Office of Technical Assistance for Toxics Use Reduction 100 Cambridge Street, #2109 Boston, MA 02202 617-727-3260 x698 617-727-3827 fax
Michigan	David Fiedler, Manager, MI Clean Air Assistance Program MI Department of Environmental Quality, Environmental Assistance Division P.O. Box 30457 116 W. Allegan Street Lansing, MI 48909 517-373-0607 517-335-4729 fax	Donna Davis, Technical Assistance Coordinator, MI Clean Air Assistance Program MI Department of Environmental Quality, Environmental Assistance Division P.O. Box 30457 116 W. Allegan Street Lansing, MI 48909 517-335-2874 517-335-4729 fax
Minnesota	Laurel Mezner, Ombudsman MPCA-EPRO 520 Lafayette Road St. Paul, MN 55155-4194 612-297-8615 612-297-8324 fax	Leo Raudys, SBCAP Coordinator MPCA-AQD 520 Lafayette Road St. Paul, MN 55155-4194 612-297-2316 612-297-7709 fax
Mississippi	Jesse Thompson, Jr., SBO & Technical Assistance Director Department of Environmental Quality 2380 Highway 80 West P.O. Box 10385 Jackson, MS 39209 601-961-5171 601-961-5742 fax	Danny Jackson, Chief Air Toxics Department of Environmental Quality 2380 Highway 80 West P.O. Box 10385 Jackson, MS 39209 601-961-5171 601-961-5742 fax

**TABLE D-1
(Continued)**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Missouri	Byron F. Shaw, Jr., P.E. Small Business Technical Assistance Unit Chief Department of Natural Resources-TAP 1659 E. Elm Street P.O. Box 176 Jefferson City, MO 65102 573-526-6627 573-526-5808 fax	James F. Penfold, Director, Technical Assistance Program Department of Natural Resources - TAP 1659 E. Elm Street P.O. Box 176 Jefferson City, MO 65102 573-526-6627 573-526-5808 fax
Montana	Jeff Essman, Chairman Compliance Advisory Panel 2804 Grand Avenue Billings, MT 59102 406-655-9420 406-655-9421 fax	Mark Lambrecht, Ombudsman Small Business Assistance Program 1424 9th Avenue P.O. Box 200501 Helena, MT 59620-0501 406-444-2960 800-433-8773 406-444-1872 fax
Nebraska	Daniel M. Eddinger, Public Advocate Director of SBAP/Ombudsman NE Department of Environmental Quality P.O. Box 98922 Lincoln, NE 68509-8922 402-471-3413 402-471-2909 fax	Tom Lamberson, Deputy Director NE Department of Environmental Quality P.O. Box 98922 Lincoln, NE 68509-8922 402-471-4235 402-471-2909 fax
Nevada	Ralph Capurro, Small Business Ombudsman NV Division of Environmental Protection 333 W. Nye Lane Carson City, NV 89710 702-687-4670 x3162 702-687-5856 fax	David Cowperthwaite, SBTCP Administrator NV Department of Environmental Protection 333 W. Nye Lane Carson City, NV 89710 702-687-4670 x3118 702-687-5856 fax

**TABLE D-1
(Continued)**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
New Hampshire	Rudolph A. Cartier, Jr., Ombudsman NH Small Business Technical Assistance Program 64 North Main Street Concord, NH 03301 603-271-1379 603-271-1381 fax	
New Jersey	John J. Serkies, Small Business Ombudsman NJ Department of Commerce 20 West State Street CN 823 Trenton, NJ 08625 609-633-7308 609-777-3106 fax	Chuck McCarty, Manager, SBAP NJ Department of Environmental Protection 401 East State Street CN 423 Trenton, NJ 08625 609-292-3600 609-777-1330 fax
New Mexico (except Bernalillo County)	Edgar Thornton, Deputy Secretary NMED, Ombudsman New Mexico Environment Department 1190 St. Francis Drive P.O. Box 26110 Santa Fe, NM 87502 505-827-2855 505-827-2836 fax	Cecilia Williams, Chief, Air Quality Bureau New Mexico Environment Department/Air Quality Bureau 1190 St. Francis Drive P.O. Box 26110 Santa Fe, NM 87502 505-827-0042 505-827-0045 fax
Bernalillo County	John J. Liberatore, Environmental Health Specialist II Albuquerque Environmental Health One Civic Plaza P.O. Box 1293 Albuquerque, NM 87103 505-768-1964 505-768-1977 fax	Alana Eager, Manager, Air Pollution Control Albuquerque Environmental Health One Civic Plaza P.O. Box 1293 Albuquerque, NM 87103 505-768-2620 505-768-2617 fax

TABLE D-1
(Continued)

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
New York	Tria Case Acting Small Business Ombudsman Empire State Development 633 Third Avenue, 32 Floor New York, NY 10017 212-803-2282 212-803-2309 fax	Marian J. Mudar, PhD, Program Manager Small Business Assistance Program NY State Environmental Facilities Corporation 50 Wolf Road Albany, NY 12205 518-457-3833 518-485-8494 fax
North Carolina	Edythe McKinney, Ombudsman Small Business Ombudsman's Office P.O. Box 229583 Raleigh, NC 27626-0583 919-733-1267 919-715-6794 fax	Fin Johnson, Engineer SBAP Small Business Ombudsman's Office P.O. Box 29583 Raleigh, NC 27626-0583 919-733-1267 919-715-6794 fax
North Dakota	Jeff Burgess, Ombudsman ND Department of Health P.O. Box 5520 Bismarck, ND 58506-5520 701-328-5153 701-328-5200 fax	Stan Brannin, Vice Chairman, CAP Basin Hydraulic Company P.O. Box 970 Dickinson, ND 58602-0970 701-225-8685 701-225-8755 fax
Ohio	Mark R. Shanahan, Ombudsman Ohio Air Quality Development Authority 50 W. Broad Street Columbus, OH 43512 614-728-3540 614-752-9188 fax	Richard Carleski, SBAP Manager Ohio Environmental Protection Agency P.O. Box 1049 Columbus, OH 43216-1049 614-728-1742 614-644-3681 fax
Oklahoma	Kyle Arthur, Environmental Specialist II OK Department of Environmental Quality 1000 N.E. 10th Street Oklahoma City, OK 73117-1212 405-271-1400 405-271-1317 fax	

**TABLE D-1
(Continued)**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Oregon	Peter Pedone, Sr., CAP Vice Chairperson OR Department of Environmental Quality P.O. Box 3818 #16 Ollalie Sunriver, OR 97707 541-593-7438	Paul Burnet, Ombudsman OR Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204 503-229-5776 503-229-6124 fax
Pennsylvania	Jon Miller, Air Quality Program Specialist PA Department of Environmental Protection P.O. Box 8468 400 Market Street Harrisburg, PA 17105 717-787-1663 717-772-2302 fax	
Puerto Rico	John Woodroffe, Small Business Ombudsman Commercial Development Administration P.O. Box S-4275 San Juan, PR 00902 787-728-5585 787-724-4247 fax	Francisco Claudio Rios SBAP Environmental Quality Board Ponce De Leon 431, Hato Rey P.O. Box 11488 Santurce, PR 00910 787-767-8025 787-756-5906 fax
Rhode Island	Roger Greene, Assistant to the Director Small Business Ombudsman RI DEM Director's Office 9 Hayes Street Providence, RI 02903-1037 401-277-2771 401-277-6802 fax	Richard Enander, Principal Environmental Scientist Small Business Assistance Program RI DEM Pollution Prevention Program 83 Park Street Providence, RI 02903-1037 401-277-3434, x4414 401-277-2591 fax

**TABLE D-1
(Continued)**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
South Carolina	Robin S. Stephens, Small Business Ombudsman SC DHEC EQC Administration 2600 Bull Street Columbia, SC 29201 803-734-6487 803-734-9196 fax	Willie J. Morgan, Permitting Liaison SC DHEC EQC Administration 2600 Bull Street Columbia, SD 29201 803-734-5179 803-734-9196 fax
South Dakota	Joe Nadenicek, Small Business Ombudsman SD DENR 523 East Capitol Pierre, SD 57501 605-773-3836 605-773-6035 fax	Brian Gustafson, Natural Resources Engineer Small Business Assistance Program SD DENR 523 East Capitol Pierre, SD 57501 605-773-3351 605-773-4068 fax
Tennessee	Ernest C. Blankenship, Advocate TN Department of Environment & Conservation 8th Floor, L & C Annex 401 Church Street Nashville, TN 37243 615-532-8012 615-532-0614 fax	Linda F. Sadler, Manager, CAAP TN Department of Environment & Conservation 8th Floor, L & C Annex 401 Church Street Nashville, TN 37243 615-532-8012 615-532-0614 fax
Texas	Tamra-Shae Oatman, Small Business Advocate Small Business Ombudsman TNRCC P.O. Box 13087, MC 106 Austin, TX 78711 512-239-1066 512-239-1065 fax	Kerry J. Drake, Manager, Technical Assistance TNRCC P.O. Box 13087 Austin, TX 78711 512-239-1066 512-239-1065 fax

**TABLE D-1
(Continued)**

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Utah	<p>Tamara Wharton, Small Business Ombudsman Utah Department of Environmental Quality Division of Air Quality 150 N. 1950 W. North Temple Street Salt Lake City, UT 84116 801-536-4231 801-536-4099 fax</p>	<p>Frances Bernards, SBAP Coordinator Small Business Assistance Program Utah Department of Environmental Quality Division of Air Quality 150 N. 1950 W. North Temple Street Salt Lake City, UT 84116 801-536-4056 801-536-4099 fax</p>
Vermont	<p>Kevin J. Bracey, Air Quality Permit Assistant Acting Ombudsman Air Pollution Control Division 103 South Main Street Building 3, South Waterbury, VT 05671-0402 802-241-3841 802-241-2590</p>	
Virginia	<p>John M. Daniel, Jr., Air Division Director Small Business Ombudsman Virginia Department of Environmental Quality P.O. Box 10009 629 E. Main Street Richmond, VA 23240 804-698-4311 804-698-4510 fax</p>	<p>Richard G. Rasmussen, Jr., Director SBAP Small Business Assistance Program Virginia Department of Environmental Quality P.O. Box 10009 629 E. Main Street Richmond, VA 23240 804-698-4394 804-698-4510 fax</p>
Virgin Islands	<p>Austin Moorehead, Director, Division of Environmental Protection Department of Planning and Natural Resources Building 111, Water Gut Homes St. Croix, VI 00820 809-773-0565 809-773-9310 fax</p>	<p>Marylyn A. Stapleton, SBTAP Coordinator, DEP Department of Planning and Natural Resources Wheatley Shopping Center II St. Thomas, VI 00802 809-777-4577 809-774-5416 fax</p>

TABLE D-1
(Continued)

STATE OR TERRITORY	PRIMARY CONTACT	ALTERNATE CONTACT
Washington	Bernard Brady, Environmental Engineer BAP Implementation Coordinator Washington Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600 360-407-6803 360-407-6802 fax	Leighton Pratt, Environmental Planner IV BAP Ombudsman Washington Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600 360-407-7018 360-407-6802 fax
West Virginia	Ken Shaw, Small Business Ombudsman WV Division of Environmental Protection 1558 Washington Street, East Charleston, WV 25311-2599 304-558-1218 304-558-1222 fax	Fred Durham, SBAP Manager Small Business Assistance Program WV Division of Environmental Protection Office of Air Quality 1558 Washington Street, East Charleston, WV 25311-2599 304-558-1217 304-558-1222 fax
Wisconsin	Roger Nacker, Director, Office of Permit Information & Environmental Services Small Business Clean Air Ombudsman Wisconsin Department of Development 123 West Washington Avenue P.O. Box 7970 Madison, WI 53707 608-266-1386 608-267-0436 fax	Clifford Fleener, Clean Air Specialist Wisconsin Department of Development 123 West Washington Avenue P.O. Box 7970 Madison, WI 53707 608-264-6153 608-267-0436 fax
Wyoming	Charles N. Raffelson, SBA Coordinator DEQ/AOD Herschler Building 122 W. 25th Street Cheyenne, WY 82002 307-777-7391 307-777-5616 fax	Kelly Pelissier, Management Consultant Small Business Ombudsman DEQ Herschler Building 122 W. 25th Street Cheyenne, WY 82002 307-777-7758 307-777-7682 fax

**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	11/92	11/92	11/92	5/93	8/94	N.O.
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.
Pinal Cty.	11/93	11/93	N.E.	11/93	11/93	N.O.
Maricopa Cty.	N.E.	1/95	N.E.	N.O.	2/95	N.O.
Pima Cty. & Tucson	N.E.	12/93	N.E.	N.O.	12/93	N.O.
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.
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	N.E.	12/95	12/95	N.O.
District of Columbia	12/93	1/94	N.E.	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	No response					
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	7/94	7/95	3/93	7/94	11/95
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

**TABLE D-2
(Continued)**

STATE OR TERRITORY	MONTH & YEAR OF ESTABLISHMENT			MONTH & YEAR OPERATIONS BEGAN		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Kentucky	6/92	7/94	10/94	6/92	10/94	3/95
Louisiana	11/92	11/92	11/92	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.	9/93	N.E.	N.O.	11/93	N.O.
Michigan	10/95	9/94	9/94	10/95	9/94	9/94
Minnesota	4/92	4/92	4/92	6/93	7/93	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	2/93	12/93	12/93	2/93
Nebraska	9/92	9/92	2/93	11/92	11/92	2/93
Nevada	1/95	1/95	1/95	3/95	*	12/95
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	N.O.
New Mexico (except Bernalillo County)	10/92	10/92	10/94	9/94	1/93	11/95
Bernalillo County	10/92	10/92	10/94	11/95	3/95	11/95
New York	4/92	4/92	N.E.	1/93	4/92	N.O.
North Carolina	1/93	8/93	11/94	1/93	8/93	11/94
North Dakota	4/92	4/92	5/92	4/92	4/92	6/93
Ohio	10/94	10/94	10/94	12/94	5/95	1/96

**TABLE D-2
(Continued)**

STATE OR TERRITORY	MONTH & YEAR OF ESTABLISHMENT			MONTH & YEAR OPERATIONS BEGAN		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Oklahoma	6/94	6/94	N.E.	6/94	10/94	N.O.
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	1/95	11/94	1/96	1/95	11/94	N.O.
Rhode Island	5/95	N.E.	N.E.	5/95	N.O.	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	11/94
Utah	1/94	1/94	11/94	5/94	1/93	6/95
Vermont	N.E.	N.E.	N.E.	N.O.	N.O.	N.O.
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 92	Summer 93	Fall 92	Summer 92	Fall 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.E. = Not Established; N.O. = Not Operational

* Technical Assistance Coordinator not hired as of 12/95. SBO and Administrator/Program Manager of SBTCP provide technical assistance services on a limited basis.

**TABLE D-3
1995 SBTCP BUDGET INFORMATION AND FUNDING SOURCES**

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Alabama	165,000	50,000	0	Title V fees, Hazardous Waste Funds, Solid Waste Funds, Surface Water Funds	Title V fees, federal air grant	
Alaska	200,000 (FY96 7/95-6/96)	combined	combined	Indirect funding from all programs including general fund and program receipts	same	same
Arizona	165,000 combined			Air Quality Permit Fees (combined)		
Pinal Cty.	10,000	10,000		County's general fund	Non-Title V permit fees	
Maricopa Cty.		75,000			Permit fees & existing programs	
Pima Cty. & Tucson		100,000			Title V fees, Hazardous Materials Landfill Tipping Fee, General Operating Fund	
Arkansas	73,132	89,643	2,100	EPA allocation and Title V fees	EPA allocation and Title V fees	EPA allocation and Title V fees
California	200,000	340,000	0	State Budget Act	State Budget Act	0
Colorado	90,000	120,000	0	Stationary Sources Cash Fund, from permitting and annual fees	Stationary Sources Cash Fund, from permitting and annual fees	
Connecticut	160,000 (SBO & SBAP)	combined w/SBO	5,000	State fund that supports Clean Air Act - vehicle registration fees		

**TABLE D-3
(Continued)**

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Delaware	80,000	as needed from SBO	as needed from SBO	Title V		
District of Columbia	30,000	20,000	5,000	Air grant	Air grant	District appropriation
Florida	All funded through SBAP	All funded through SBAP		Title V fees		
Georgia	50,000	55,000	5,000	Title V fees	Title V fees	Title V fees
Hawaii	No response	No response	No response	No response	No response	No response
Idaho	65,000	30,000	5,000	Title V fees	Special projects funding - federal grant	Title V fees
Illinois	55,000	190,000	0	Permit & inspection funds	EPA 105 grant from IEPA, CAAP fees	N/A
Indiana	150,000	700,000	3,000	General revenues/Title V fees	General revenues/Title V fees/enforcement fines	Legislative Services Agency
Iowa	74,500	232,000	N/A	Title V fees	Title V fees	N/A
Kansas	200,000	300,000	from SBO	Air emission fees	Air emission fees	Air emission fees
Kentucky	90,000 (40,000 JCAPCD SBO)	250,000	2,000	Title V fees EPA 105 Grant and County general funds	Title V fees	Title V fees
Louisiana	50,000	400,000	0	Interagency transfer	105 grant, self-generated	N/A
Maine	40,000	75,000	as needed	Toxics Use Reduction Program	Title V fees	Toxics Use Reduction Program
Maryland	0	210,000	N/A	N/A	Air general funds, indirect funds	N/A

**TABLE D-3
(Continued)**

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Massachusetts	0 (supported by OTA w/TURA budget)	0	N/A	N/A	N/A	N/A
Michigan	80,000 (FY 94-95)	466,000 (FY 94-95)	0	State & County fees, restricted funds	State & County fees, restricted funds	Unfunded
Minnesota	93,000	430,000	3,000	Air fees (non-Title V), 105 grant	Air fees (non-Title V), 105 grant, EPA grant	Air fees (non-Title V), 105 grant
Mississippi	150,000	150,000	5,000	Title V fees	Title V fees	Title V fees
Missouri	45,273	292,528	10,000	Title V fees and other fees	Title V fees and general revenue	Title V fees
Montana	130,000	combined w/SBO	1,000	Air Operating Permit fees	Included w/SBO	Air Operating Permit fees
Nebraska	105,000 (combined)	combined	combined	Title V, 105 Air, Pollution, Groundwater, & Grant Flex programs		
Nevada	46,900	0	600	Indirect cost fund from NDEP bureaus	Indirect cost fund from NDEP bureaus	Clean Air Management fund
New Hampshire	25,000	75,000	Included in SBAP	Permit fees, 105 grant	Permit fees, 105 grant	
New Jersey	40,000	0	0	Title V fees	Title V fees	N/A
New Mexico (except Bernalillo County)	10,000	205,000	<1,000	Title V fees	Title V fees	Title V fees
Bernalillo County	0	40,000	0	Title V fees	Title V fees	Title V fees
New York	1,200,000	926,000	30,000	NY Clean Air Fund/Title V fees	NY Clean Air Fund/Title V fees	NY Clean Air Fund/Title V fees

**TABLE D-3
(Continued)**

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
North Carolina	320,000 (SBO & SBAP)	SBO & SBAP combined	5,000	Title V fees	Title V fees	Title V fees
North Dakota	30,000	30,000	0	105 grant, state permit fees, Title V fees	105 grant, state permit fees, Title V fees	105 grant, state permit fees, Title V fees
Ohio	185,000	195,000	0	Title V fees, OAQDA resources	Title V fees	
Oklahoma	10,000	115,000	0	Agency indirect costs	Air Quality Title V fees	N/A
Oregon	30,963	173,675	2,000	Title V fees	Title V fees	Title V fees
Pennsylvania	185,000	460,000	10,000	Title V fees	Title V fees	Title V fees
Puerto Rico	25,000	100,000	10,000	Title V	Title V	Title V
Rhode Island	64,938	42,258	0	State P2 Hard-to-dispose Materials Account	State P2 Hard-to-dispose Materials Account	N/A
South Carolina	35,000	85,000	1,500	Title V fees	Title V fees	Title V fees
South Dakota	25,000	10,000	5,000	Title V fees	Title V fees	Title V fees
Tennessee	900,000 (SBO & SBAP)	SBO & SBAP	SBO & SBAP	Title V fees	Title V fees	Title V fees
Texas	1,470,000	SBO, SBAP, CAP combined; for fiscal year	combined	151 funds, 102 grant funds	combined	combined
Utah	120,000	135,000	5,000	Title V fees, EPA grant "Utah State Air Fair," EPA grant "Partnership for Compliance"	Title V fees	Title V fees
Vermont	0	0	0			
Virginia	20,000	310,000	5,000	General funds & federal trust	Federal trust, permit fees, and general fund.	General funds & federal trust.

TABLE D-3
(Continued)

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Virgin Islands	0	55,000	0		Title V fees	
Washington	40,000	225,000	5,000	Title V fees	Title V fees, 105 grant	Title V fees
West Virginia	50,000	90,000	5,000	Title V fees & Agency penalties	Title V fees & Agency penalties	Agency penalties
Wisconsin	5,000	117,000	3,000	Program revenue permit fees	Program revenue permit fees	Program revenue permit fees
Wyoming	25,000	75,000	10,000	Title V fees	Title V fees	Title V fees

EPA 105 grants are provided for in the CAAA, Section 105. Funding is distributed to the states through the EPA regional offices.

Leadership grants (Research and Development grants to the states) flow from EPA's Office of Research and Development through the Innovative Technology Control Program. Funding comes from the President's Environmental Technology Initiative (ETI), funded at \$68 for FY 96.

**TABLE D-4
SBTCP BUDGETS FOR 1994 AND 1996 REPORTING PERIODS**

DESCRIPTIONS OF SIGNIFICANT FUNDING CHANGES

STATE OR TERRITORY	BUDGET FOR 1994 REPORTING PERIOD (\$)			BUDGET FOR 1996 REPORTING PERIOD (\$)		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Alabama	165,000	50,000	0	170,000	50,000	0
Alaska	0	0	0	200,000	combined	combined
Arizona	165,000 combined	combined	combined	165,000 combined	combined	combined
Pinal Cty.	10,000	10,000		10,000	10,000	
Maricopa Cty.					200,000	
Pima Cty. & Tucson		100,000			50,000	
Arkansas	70,000	50,000	600	80,000	146,242	4,200
California	200,000	340,000	N/A	200,000	340,000	Budget reallocations as necessary
Colorado	90,000	120,000	0	90,000	120,000	0
Connecticut	100,000	0	0	325,000	0	5,500
Delaware	0	0	0	80,000	as needed from SBO	as needed from SBO
District of Columbia	30,000	20,000	10,000	30,000	20,000	10,000
Florida	0	256,500	0	No response	No response	No response
Georgia	50,000	50,000	1,000	55,000	100,000	7,000
Hawaii	0	0	0	0	0	0
Idaho	65,000	30,000	5,000	65,000	N/A	5,000
Illinois	0	80,000	0	73,000	450,000	0
Indiana	50,000	300,000	0	150,000	700,000	3,000

**TABLE D-4
(Continued)**

STATE OR TERRITORY	BUDGET FOR 1994 REPORTING PERIOD (\$)			BUDGET FOR 1996 REPORTING PERIOD (\$)		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Iowa	18,625	210,000	0	84,500	310,000	0
Kansas	150,000	250,000	travel only	200,000	300,000	travel only
Kentucky	10,000 (0: JCAPCD)	250,000	400	107,000 (46,000: JCAPCD)	250,000	2,000
Louisiana	75,000	400,000	0	unknown	400,000	0
Maine	40,000	90,000	as needed	40,000	75,000	as needed
Maryland	0	90,000	N/A	0	60,000	N/A
Massachusetts	Not est.	N/A All activities funded to date through OTA as part of multi-media P2 programs	N/A	Not est.	N/A	N/A
Michigan	0	0	0	79,000	462,000	0
Minnesota	0	0	0	0	0	0
Mississippi	15,000	45,000	5,000	150,000	150,000	5,000
Missouri	31,191	200,807	0	47,557	329,411	10,000
Montana	130,000	combined w/SBO	1,000	130,000	combined w/SBO	1,000
Nebraska	105,000	0	0	105,000	0	0
Nevada	N/A	N/A	N/A			
New Hampshire	25,000	75,000	0	No response	No response	No response
New Jersey	0	0	0	80,000	0	0
New Mexico (except Bernalillo County)	Inactive	100,000	Inactive	10,000	260,000	<3,000
Bernalillo County	Inactive	Inactive	Inactive	25,000	105,000	Funded by NM program

**TABLE D-4
(Continued)**

STATE OR TERRITORY	BUDGET FOR 1994 REPORTING PERIOD (\$)			BUDGET FOR 1996 REPORTING PERIOD (\$)		
	SBO	SBAP	CAP	SBO	SBAP	CAP
New York	950,000	584,250	30,000	1,200,000	1,000,000	30,000
North Carolina	210,000 SBO & SBAP	SBO & SBAP combined	1,000			
North Dakota	30,000	30,000	1,000	30,000	15,000	1,000
Ohio	Not operational	Not operational	Not operational	560,000	375,000	combined w/SBAP
Oklahoma	10,000	115,000	0	10,000	115,000	0
Oregon	29,727	171,807	1,500	31,756	172,855	2,120
Pennsylvania	180,000	450,000	10,000	190,000	500,000	10,000
Puerto Rico	0	0	0	no response	no response	no response
Rhode Island	0	0	0	92,000	100,000	10,000
South Carolina	35,000	85,000	1,500	35,000	85,000	1,500
South Dakota	25,000	10,000	5,000	50,000	10,000	5,000
Tennessee	900,000 SBO & SBAP	SBO & SBAP combined	Inactive	900,000 SBO & SBAP	SBO & SBAP combined	included w/SBO
Texas	1,160,000 (SBO, SBAP, CAP combined; fiscal year)	combined	combined	1,260,000 (SBO, SBAP, CAP combined; fiscal year)	combined	combined
Utah	70,000	130,000	N/A	200,000	140,000	15,000
Vermont	No response					
Virginia	20,000	310,000	5,000	20,000	310,000	5,000
Virgin Islands	Inactive	Inactive	Inactive	Unknown	65,000	5,000
Washington	40,000	230,000	5,000	40,000	200,000	5,000
West Virginia	0	70,000	0	50,000	100,000	5,000
Wisconsin	5,000	114,000	3,000	5,000	117,000	3,000

TABLE D-4
(Continued)

STATE OR TERRITORY	BUDGET FOR 1994 REPORTING PERIOD (\$)			BUDGET FOR 1996 REPORTING PERIOD (\$)		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Wyoming	25,000	50,000	0	25,000	75,000	10,000

**TABLE D-4
(Continued)**

Significant changes (more than 10%) in the level of funding between the 1994, 1995, and 1996 annual budget periods are described below.

STATE	DESCRIPTION OF SIGNIFICANT BUDGET CHANGES
Alaska	Program not established during previous reporting period.
Arizona - Maricopa County	There will be a significant increase in the SBEAP budget next year due to the increased revenue generated by bringing new companies under permit. This increase will be used to expand services provided (P2, hazardous waste, wastewater), market SBEAP to increase the number of businesses helped while reducing apprehension for entering the system, and develop educational materials and workshops.
Arizona - Pima County & Tucson	Hazardous Materials Landfill Fee has been redesignated for other uses, more department programs are dependent on general operating funds, and revisions to county air quality code have delayed reissuance of permits and reduced number of permitted sources. Resultant drop in revenue and funding will severely affect program operations.
Arkansas	Program has experienced growth in staffing levels and expenses. Added Service Representative to SBAP between previous and current period. Plan to add Technical Writer following current reporting period.
Connecticut	A projected budgetary increase is expected for the 1996 calendar year. CTSBTCPC will see an increase in funding due to \$150,000 SBAP Leadership Grant as well as the addition of two staff people.
Georgia	The addition of an engineer to the small business program resulted in an increase in the SBAP budget.
Idaho	SBAP portion was funded primarily through 105b special projects fund. This line item is no longer available. Current funding for FTE in the SBAP is not known at this time.
Illinois	SBAP funding has increased each year since we began developing the program. Program development funding was from grant from IEPA to DCCA. IEPA provided dollars from their 105 grant. Beginning October 1995, (start of FY 96), the SBAP has been funded and will continue to be funded with Title V fees. Increases in budgets have been due to staff increase, and since 11/94, due to program activity increases. On 12/31/95, SBAP had 5 staff working with the program: a program manager, clearinghouse coordinator, outreach coordinator, help line coordinator, and an administrative assistant.
Indiana	Program start-up required larger budget.
Iowa	IAEAP funding levels have systematically increased because of DNR-AQB budget increased through collection of Title V revenues and because of DNR's and businesses' recognition of IAEAP's success in assisting small businesses with improving compliance rates and emission reduction rates.
Kansas	Increases needed as the program became fully operational.
Kentucky	In February 1995, Ombudsman employed on a full-time basis to work with the Program. Prior to then, an Ombudsman was assigned on a part-time basis. CAP members were appointed October 1994; first meeting held March 1995. JCAPCD SBO was employed during August 1995.
Louisiana	SBO contract was reduced by the funding agency.

TABLE D-4
(Continued)

STATE	DESCRIPTION OF SIGNIFICANT BUDGET CHANGES
Maryland	For the first half of 1995, SBAP funded for three engineers and a dedicated secretary. As a result of MDE's reorganization, the program was reduced to one engineer and 15% of a secretary. The scope of the program was changed from air-only assistance to multi-media assistance. Funding was moved from the Air and Radiation Management Administration to the indirect funds from the Office of the Secretary. The program is expected to remain the same for 1996.
Minnesota	96-97 EPA Leadership Grant of \$150,000 to provide compliance and P2 assistance to the wood finishing industry.
Mississippi	1995 budget revealed an increase over 10% because of the hiring of the Ombudsman, a Secretary, and a Public Relations Representative. The Ombudsman Office also entered into a contract with MISSTAP to provide technical assistance visits.
Missouri	SBO: Addition of clerical assistance was required. SBAP: The 6 existing FTE have been employed during the previous and current budget periods. It is hoped that removal of funding constraints will allow recruitment for the 2 vacancies later this budget period of in the next annual period. CAP: Committee has not been appointed at this time.
Nevada	This program was only established in January 1995. The increase is expected budget for FY 1996 stems from fact that a technical assistance person in SBAP has yet to be hired. Additional funds for CAP reflect fact that it only started meeting in December 1995.
New Mexico (except Bernalillo County)	Funding increased from previous year as staffing increased. Future funding will be influenced by lower state appropriations and competition for Title V resources.
Bernalillo County	For 1996, anticipate 2.00 FTE and active SBO.
New York	Moved into full SBTCP implementation. Appropriations increased to cover expanded scope of services.
North Carolina	New engineer to be added to SBAP will result in increase in salary, fringes and operations. In addition, a substantial increase in rent for office space increases budget requirements.
North Dakota	The last 2 calendar years required more resources in the development of the programs than will be required to maintain the programs, particularly the SBAP. This is based on: 1) past demand for SBAP resources, and 2) estimated small number of small businesses in ND that will be affected by new rules in the next year.
Ohio	Budget for SBAP in calendar year 1995 actually covers July-December 1995, which is the first half of the State Fiscal Year 1996. This was the first budget for which these activities had appropriated funds. Calendar year 1996 figures are based on current projections of both program expenditures and Title V fee revenues. The same applies to the state-appropriated funds supporting the Ombudsman program. In addition, the Ombudsman program includes funds set aside for providing financing assistance to small businesses. The revenue source for these funds is a fifty cents per ton fee within the Title V fee structure.
Oregon	SBAP is funding some special projects with non-Title V fees. An EPA 105 Grant was awarded to fund a dry cleaner green sticker project. Additionally, the four Region X SBAPs (Alaska, Idaho, Oregon, Washington) are funding special research projects through Pacific Northwest Pollution Prevention Research Center in Seattle. Oregon's share of the \$200,000 (\$150,000 Leadership Grant + \$50,000 105 Grant) is \$25,000 for 1996 and 1997 (\$50,000 total). Otherwise, no increase or decrease in SBAP funding is anticipated.

**TABLE D-4
(Continued)**

STATE	DESCRIPTION OF SIGNIFICANT BUDGET CHANGES
Puerto Rico	Beginning on March 27, 1996, EQB will provide funds through Title V depending on the need of each section.
Rhode Island	Change in funding from previous (SBO/SBAP/CAP did not exist) to current (using existing staff to cover SBAP responsibilities) to next annual budget period reflects SBAP and SBO programs coming on-line.
Texas	SBO and SBAP offices were consolidated and four positions eliminated due to agency-wide staff reduction plan. The elimination of these positions was responsible for the 14% reduction in funding.
Utah	<p>Ombudsman position was vacated in late 1994, then filled March 1995. The Voluntary Assistance Program (courtesy inspector) was filled in May. The 1995 budget reflects funds utilized according to these hire dates, as well as professional development training and operational set-up.</p> <p>This past summer, two grants were submitted to EPA by the Ombudsman's office. These grants were awarded for 1) Utah State Air Fair/small business booth (\$10,000 in outreach funds) and 2) Partnership for Compliance/Small Business Leadership Grant (\$150,000 three year project focusing on P2, multi-media, and leveraging with businesses). The 1996 budget projection incorporates the numerous Leadership project outreach activities, which includes business scoping, summit, and multi-media "road shows" to outlying areas of the state.</p> <p>Utah's Small Business Advisory Committee was not operational prior to 6/1/95. Since then, the Committee has been highly active through monthly meetings, outreach efforts, and most recently, subcommittee work. Their projected budget reflects these projects and also allows for some limited training and coordination opportunities.</p> <p>Additionally, budgets for all three years includes a 5% inflation increase.</p>
Virgin Islands	SBAP support provided by the Small Business Development Agency of the University of the Virgin Islands until the second quarter of 1995.
Washington	Expected budget for next reporting period may be lower if 105 grant funds from EPA are not appropriated for state SBAPs.
West Virginia	SBO & SBAP did not operate prior to 1995. SBAP added staff in 1994.

TABLE D-4
(Continued)

COMPARISON OF 1994, 1995, AND 1996 BUDGETS

STATE OR TERRITORY	BUDGET FOR 1994 REPORTING PERIOD (\$)				BUDGET FOR 1995 REPORTING PERIOD (\$)				BUDGET FOR 1996 REPORTING PERIOD (\$)			
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL
Alabama	185,000	50,000	0	215,000	185,000	50,000	0	215,000	170,000	50,000	0	220,000
Alaska	0	0	0	0	200,000	combined	combined	200,000	200,000	combined	combined	200,000
Arizona	185,000 combined	combined	combined	185,000	185,000 combined	combined	combined	185,000	185,000 combined	combined	combined	185,000
Pinal County	10,000	10,000		10,000					10,000	10,000		
Maricopa County										200,000		
Pima County & Tucson		100,000		100,000						50,000		
Arkansas	70,000	50,000	800	120,800	73,132	89,843	2,100	164,875	80,000	148,242	4,200	230,442
California	200,000	340,000	N/A	540,000	200,000	340,000	0	540,000	200,000	340,000	combined	540,000
Colorado	90,000	120,000	0	210,000	90,000	120,000	0	210,000	90,000	120,000	0	210,000
Connecticut	100,000	0	0	100,000	180,000	combined	5,000	210,000	325,000	0	5,500	330,500
Delaware	0	0	0	0	80,000	as needed from SBO	as needed from SBO	80,000	80,000	as needed from SBO	as needed from SBO	80,000
District of Columbia	30,000	20,000	10,000	60,000	30,000	20,000	as needed from SBO	50,000	30,000	20,000	10,000	60,000
Florida	0	258,500	0	258,500	funded through SBAP	funded through SBAP	funded through SBAP	NR	NR	NR	NR	NR
Georgia	50,000	50,000	1,000	110,000	50,000	55,000	5,000	110,000	55,000	100,000	7,000	162,000
Hawaii	No response.											
Idaho	65,000	30,000	5,000	100,000	65,000	30,000	5,000	100,000	65,000	N/A	5,000	70,000
Illinois	0	80,000	0	80,000	55,000	190,000	0	245,000	73,000	450,000	0	523,000
Indiana	50,000	300,000	0	350,000	150,000	700,000	3,000	853,000	150,000	700,000	3,000	853,000
Iowa	18,825	210,000	0	228,825	74,500	232,000	0	306,500	84,500	310,000	0	394,500
Kansas	150,000	250,000	travel only	400,000	200,000	300,000	from SBO	500,000	200,000	300,000	travel only	500,000
Kentucky	10,000 (0: JCAPCD)	250,000	400	260,400	80,000 (40,000 JCAPCD)	250,000	2,000	342,000 (+40,000 JCAPCD)	107,000 (48,000: JCAPCD)	250,000	2,000	359,000 (+48,000 JCAPCD)
Louisiana	75,000	400,000	0	475,000	50,000	400,000	0	450,000	unknown	400,000	0	400,000
Maine	40,000	80,000	as needed	130,000	40,000	75,000	as needed	115,000	40,000	75,000	as needed	115,000

**TABLE D-4
(Continued)**

STATE OR TERRITORY	BUDGET FOR 1994 REPORTING PERIOD (\$)				BUDGET FOR 1995 REPORTING PERIOD (\$)				BUDGET FOR 1996 REPORTING PERIOD (\$)			
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL
Maryland	0	90,000	N/A	90,000	0	210,000	0	210,000	0	80,000	N/A	80,000
Massachusetts	Not est.	N/A All activities funded to date through OTA as part of multi-media P2 programs	N/A	0	0	0	0	0	Not est.	N/A	N/A	0
Michigan	0	0	0	0	80,000	488,000	0	568,000	79,000	462,000	0	541,000
Minnesota	0	0	0	0	93,000	430,000	3,000	526,000	No response.			
Mississippi	15,000	45,000	5,000	65,000	150,000	150,000	5,000	305,000	150,000	150,000	5,000	305,000
Missouri	31,181	200,807	0	231,988	45,273	282,528	10,000	347,801	47,557	329,411	10,000	386,968
Montana	130,000	combined w/SBO	1,000	131,000	130,000	combined w/SBO	1,000	131,000	130,000	combined w/SBO	1,000	131,000
Nebraska	105,000	0	0	105,000	105,000	combined	0	105,000	105,000	0	0	105,000
Nevada	N/A	N/A	N/A	0	48,900	0	800	47,500	No response.			
New Hampshire	25,000	75,000	0	100,000	25,000	75,000	0	100,000	No response.			
New Jersey	0	0	0	0	40,000	0	0	40,000	80,000	0	0	80,000
New Mexico (except Bernalillo County)	Inactive	100,000	Inactive	100,000	10,000	205,000	<1,000	218,000	10,000	280,000	< 3,000 Funded by NM program	273,000
Bernalillo County	Inactive	Inactive	Inactive		0	40,000	0	40,000	25,000	105,000		170,000
New York	950,000	584,250	30,000	1,564,250	1,200,000	928,000	30,000	2,158,000	1,200,000	1,000,000	30,000	2,230,000
North Carolina	210,000 SBO & SBAP	SB0 & SBAP combined	1,000	211,000	320,000	combined	5,000	325,000	No response.			
North Dakota	30,000	30,000	1,000	81,000	30,000	30,000	0	80,000	30,000	15,000	1,000	46,000
Ohio	Not operational	Not operational	Not operational	0	185,000	185,000	0	380,000	560,000	375,000	combined w/SBAP	935,000
Oklahoma	10,000	115,000	0	125,000	10,000	115,000	0	125,000	10,000	115,000	0	125,000
Oregon	28,727	171,807	1,500	203,034	30,983	173,676	2,000	208,838	31,758	172,855	2,120	208,731
Pennsylvania	180,000	450,000	10,000	840,000	185,000	480,000	10,000	855,000	190,000	500,000	10,000	700,000
Puerto Rico	0	0	0	0	25,000	100,000	10,000	135,000	No response.			

**TABLE D-4
(Continued)**

STATE OR TERRITORY	BUDGET FOR 1984 REPORTING PERIOD (\$)				BUDGET FOR 1985 REPORTING PERIOD (\$)				BUDGET FOR 1986 REPORTING PERIOD (\$)			
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL
Rhode Island	Not operational	Not operational	Not operational	0	64,938	42,268	0	107,198	82,000	100,000	10,000	202,000
South Carolina	35,000	85,000	1,500	121,500	35,000	85,000	1,500	121,500	35,000	85,000	1,500	121,500
South Dakota	25,000	10,000	5,000	40,000	25,000	10,000	5,000	40,000	50,000	10,000	5,000	65,000
Tennessee	900,000 SBO & SBAP	SBO & SBAP combined	Inactive	900,000	900,000	combined	combined	900,000	900,000 SBO & SBAP	SBO & SBAP combined	included w/SBO	900,000
Texas	1,180,000 (SBO, SBAP, CAP combined; fiscal year)	combined	combined	1,180,000	1,470,000	combined	combined	1,470,000	1,280,000 (SBO, SBAP, CAP combined; fiscal year)	combined	combined	1,280,000
Utah	70,000	130,000	N/A	200,000	120,000	135,000	5,000	260,000	200,000	140,000	15,000	355,000
Vermont	No response				0	0	0	0	No response			
Virginia	20,000	310,000	0	330,000	20,000	310,000	5,000	335,000	20,000	310,000	5,000	335,000
Virgin Islands	0	0	0	0	0	55,000	0	55,000	unknown	65,000	5,000	70,000
Washington	40,000	230,000	5,000	275,000	40,000	225,000	5,000	270,000	40,000	200,000	5,000	245,000
West Virginia	0	70,000	0	70,000	50,000	80,000	5,000	145,000	50,000	100,000	5,000	155,000
Wisconsin	5,000	114,000	3,000	122,000	5,000	117,000	3,000	125,000	5,000	117,000	3,000	125,000
Wyoming	25,000	50,000	0	75,000	25,000	75,000	10,000	110,000	25,000	75,000	10,000	110,000

**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 (NO. FTEs)		SBAP FUNCTION (NO. FTEs)			
	SBO	OTHER STAFF	ALL STAFF	PAID	UNPAID	RETIRED ENGINEERS
Alabama	1.00	2.00	1.00	1.00		
Alaska	1.00	0.25	1.50	1.50		
Arizona	0.25		2.25			
Pinal County		0.25	0.25	0.25		
Maricopa County			2.00	2.00		
Pima County & Tucson			1.50	1.50		
Arkansas	1.00		5.50	5.50		2.00
California	2.00	3.00	4.00	4.00		
Colorado	1.50		2.00	2.00		
Connecticut	*2.00	*2.00	*	*4.00		
Delaware	1.00		1.00	1.00		
District of Columbia	0.50		0.50	0.50		
Florida	1.00		3.00	NA	NA	NA
Georgia	0.50	0.50	3.00	3.00		
Hawaii						
Idaho	1.00		1.00	1.00		
Illinois	1.50		4.50	4.50		
Indiana	0.75	0.25	12.00	12.00		
Iowa	1.00	0.50	4.00	4.00		
Kansas	1.00	0.50	3.50	3.50		

**TABLE D-5
(Continued)**

STATE OR TERRITORY	SBO FUNCTION (NO. FTEs)		SBAP FUNCTION (NO. FTEs)			
	SBO	OTHER STAFF	ALL STAFF	PAID	UNPAID	RETIRED ENGINEERS
Kentucky	1.50 * + 1.00	0.10	3.10	3.10		
Louisiana	1.50	2.50	11.00	11.00		
Maine	1.00		1.00	1.00		
Maryland	0.20		1.15	1.15		
Massachusetts			1.75	1.75		
Michigan	1.00		5.00	5.00		
Minnesota	1.00		4.00	4.00		
Mississippi	3.00		6.50	6.50		3.00
Missouri	1.00		6.00	6.00		
Montana	1.00		1.00	1.00		
Nebraska	1.00		1.00	1.00		
Nevada	1.00	0.30	0.30	0.30		
New Hampshire	0.25		0.75	1.00		
New Jersey	1.00		1.00	1.00		
New Mexico (except Bernalillo County)	0.25	4.20	4.20	4.20		
Bernalillo County	0	1.00	1.00	1.00	0.33	0
New York	5.00	1.00	4.00	4.00		
North Carolina	1.50		2.50	2.50		
North Dakota	0.50		0.50	0.50		
Ohio	0.70	0.70	3.00	3.00		

**TABLE D-5
(Continued)**

STATE OR TERRITORY	SBO FUNCTION (NO. FTEs)		SBAP FUNCTION (NO. FTEs)			
	SBO	OTHER STAFF	ALL STAFF	PAID	UNPAID	RETIRED ENGINEERS
Oklahoma	0.10		3.20	3.20		
Oregon	0.15	0.20	2.35	2.35		
Pennsylvania	1.00	0.75	4.50			
Puerto Rico	5.00	1.00	10.00	10.00		
Rhode Island	1.00		0.50	0.50		
South Carolina	1.00		1.50	1.50		
South Dakota	0.50		0.14	0.14		
Tennessee	2.00		7.00	7.00		
Texas	20.50 SBO & SBAP			20.5		
Utah	1.00	1.00	1.50	1.50		
Vermont	0.05					
Virginia	0.10	0.90	1.30	1.30		
Virgin Islands	1.00		1.00	1.00		
Washington	0.50		2.50	2.50		
West Virginia	1.00	0.13	1.70	1.70		
Wisconsin	1.00	2.00	2.50	2.50		
Wyoming	0.10		0.90	0.90		

* Connecticut's SBO and SBAP are merged and have not been established as separate program components.
Kentucky's Jefferson County Air Pollution Control District employed 1 FTE SBO beginning 8/95.

**TABLE D-6
CAP STAFFING**

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
Alabama	3	1		3	
Alaska	4	1	2		
Arizona	4	1	2		
Arkansas	4	1	2		
California				7	
Colorado	3	1	2	1	
Connecticut	3	2	2	3	6 (non-voting)
Delaware				7	
District of Columbia	4	1		2	
Florida	5	1			1
Georgia	4	1		2	
Hawaii					
Idaho	4	1	2		
Illinois	1	1		5	
Indiana	4	1	1	1	
Iowa				7	
Kansas	4	1	2		
Kentucky	4	1	2		2
Louisiana	2	2	4		
Maine	2	2		3	9
Maryland					

TABLE C-6
(Continued)

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
Massachusetts				7	
Michigan	2	1	2		2
Minnesota	3	3	2	1	
Mississippi	4	1	2		
Missouri				7	
Montana	5	1	1		
Nebraska	4	1	2		1 (non-voting)
Nevada	4	1	2		
New Hampshire	4	1	2		
New Jersey				7	
New Mexico (except Bernalillo County)	3	1	1	2	
Bernalillo County	3	1	1	2	0
New York		1	2	6	
North Carolina	4	1	3		
North Dakota	4	1	2		
Ohio	2	1	2	2	
Oklahoma	3	1	2	1	
Oregon	4	1	2		1
Pennsylvania	5	1	3		2
Puerto Rico	3	1	2	1	

TABLE C-6
(Continued)

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
Rhode Island				7	
South Carolina	3	1	2	1	
South Dakota	4	1	2		
Tennessee				7	
Texas	4	1	2		
Utah	4	1	2		
Vermont				unknown	
Virginia	4	1	2		
Virgin Islands					
Washington	2	1	1	2	1
West Virginia	4	1	2		
Wisconsin	3	1	3	1	
Wyoming	3	1	2	1	2

**TABLE D-7
ADMINISTRATIVE LOCATION OF SBTCP COMPONENTS**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Alabama	AL Department of Environmental Management	AL Department of Environmental Management, Air Division & Office of Public Affairs	Independent
Alaska	Department of Environmental Conservation, Compliance Assistance Section	Department of Environmental Conservation, Compliance Assistance Section	Independent, but assisted by Department of Environmental Conservation, Compliance Assistance Section
Arizona	AZ Department of Environmental Quality, Office of Customer Service & External Affairs	AZ Department of Environmental Quality, Office of Customer Service & External Affairs	Independent, but managed by AZ Department of Environmental Quality, Office of Customer Service & External Affairs
Pinal County	SBAP/SBO functions are integrated directly into our permitting and inspection processes.	SBAP/SBO functions are integrated directly into our permitting and inspection processes.	N/A
Maricopa County			
Pima County and Tucson			
Arkansas	AR Department of Pollution Control and Ecology (regulatory agency)	AR Department of Pollution Control and Ecology (regulatory agency)	Independent, but managed by AR Department of Pollution Control and Ecology (regulatory agency)
California	CA Air Resources Board	CA Air Resources Board	Not established

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Colorado	CO Department of Regulatory Agencies, Office of Regulatory Reform	CO Department of Public Health and Environment, Air Pollution Control Division	Independent
Connecticut	CT Department of Environmental Protection, Bureau of Air Management	CT Department of Environmental Protection, Bureau of Air Management	Managed by CT Department of Environmental Protection, Bureau of Air Management
Delaware	DE Department of Natural Resources & Environmental Control, Office of the Secretary	DE Department of Natural Resources & Environmental Control, Office of the Secretary	Not established
District of Columbia	Environmental Regulation Administration, Department of Consumer & Regulatory Affairs	Environmental Regulation Administration, Department of Consumer & Regulatory Affairs	Independent
Florida	FL Department of Environmental Regulation, Division of Air Resource Management	FL Department of Environmental Regulation, Division of Air Resource Management	Independent
Georgia	Environmental Protection Division, Air Protection Branch	Environmental Protection Division, Air Protection Branch	Independent
Hawaii	Director of Health	Clean Air Bureau (state regulatory agency)	Independent
Idaho	Division of Environmental Quality, Planning and Support Services Division, Performance Management Bureau	Division of Environmental Quality, Permits and Enforcement Division, Technical Services Bureau	Independent

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Illinois	IL Environmental Protection Agency Small Business Office	IL Department of Commerce & Community Affairs Regulatory Assistance Office	Independent (not yet appointed)
Indiana	IN Department of Environmental Management, Office of Business Relations	IN Department of Environmental Management, Office of Pollution Prevention and Technical Assistance	Independent
Iowa	Iowa Citizens' Aide / Ombudsman Office	Iowa Waste Reduction Center, University of Northern Iowa	Not yet appointed
Kansas	KS Department of Health and Environment - Office of Pollution Prevention	Contracted - see table below	Independent
Kentucky	Office of the Secretary, Natural Resources and Environmental Protection Cabinet	Center for Business Development, College of Business and Economics, University of Kentucky	Independent
Louisiana	Governor's Office of Permits	Department of Environmental Quality, Air Quality Division	Independent
Maine	Department of Environmental Protection	Department of Environmental Protection	Independent
Maryland	MD Department of the Environment, Office of Community Assistance	MD Department of the Environment - Air & Radiation Management Administration (Jan-June), Office of the Secretary (July-Dec)	Independent

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Massachusetts	Not established	Executive Office of Environmental Affairs at OTA	Not established
Michigan	MI Jobs Commission, Business Ombudsman Office	MI Department of Environmental Quality, Environmental Assistance Division	Independent
Minnesota	MPCA - Environmental Planning and Review Office	MPCA - Air Quality Division, Manager's Office	
Mississippi	Department of Environmental Quality, Air Division	Outside	Independent
Missouri	Governor's Office	Department of Natural Resources (DNR), Division of Environmental Quality (DEQ), Technical Assistance Program (TAP)	Independent, but administrative support provided by SBAP staff
Montana	Small Business Development Center, MT Department of Commerce	Air Quality Division, MT Department of Environmental Quality	Independent; staffed by Air Quality Division, MT Department of Environmental Quality
Nebraska	NE Department of Environmental Quality, Office of Public Advocate	NE Department of Environmental Quality, Office of Public Advocate	Managed by NE Department of Environmental Quality, Office of Public Advocate
Nevada	Division of Environmental Protection, Office of the Administrator	Division of Environmental Protection, Office of the Administrator	Independent; staffed by SBO & SBAP

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
New Hampshire	NH Department of Environmental Services, Air Resources Division	NH Department of Environmental Services, Air Resources Division	Independent; staffed by NH Department of Environmental Services, Air Resources Division
New Jersey	NJ Department of Commerce & Economic Development, Division of Economic Development	NJ Department of Environmental Protection, Office of Permit Information Assistance	Managed by NJ Department of Environmental Protection
New Mexico (except Bernalillo County)	NM Environment Department	NM Environment Department, Air Quality Bureau	Independent
Bernalillo County	Environmental Health Department - Environmental Services Division	Environmental Health Department - Air Pollution Control Division	Independent
New York	Empire State Development, Division for Small Business (non-regulatory)	NY State Environmental Facilities Corporation (non-regulatory)	Independent (NY State Department of Environmental Conservation, coordinator)
North Carolina	NC Department of Environment, Health, and Natural Resources, Division of Environmental Management	NC Department of Environment, Health, and Natural Resources, Division of Environmental Management	Independent
North Dakota	Department of Health, Environmental Health Section Chief's Office	Department of Health, Division of Environmental Engineering, Air Pollution Control Program	Independent

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Ohio	Ohio Air Quality Development Authority (independent, non-regulatory)	Ohio Environmental Protection Agency, Division of Air Pollution Control	Independent
Oklahoma	ODEQ, Executive Director's Office	ODEQ, Customer Services Division	Independent, but assisted by ODEQ, Customer Services Division
Oregon	Department of Environmental Quality, Director's Office	Department of Environmental Quality, AQ Program Ops	Independent
Pennsylvania	PA Department of Commerce, Entrepreneurial Assistance Office	PA Department of Environmental Protection, Bureau of Air Quality (services contracted - see table below)	
Puerto Rico	Commercial Development Administration Executive Office	Environmental Quality Board, Air Quality Area Planning Division	Not assigned yet.
Rhode Island	RI Department of Environmental Management, Office of the Director	RI Department of Environmental Management, Office of Environmental Coordination, Pollution Prevention Section	Independent
South Carolina	Department of Health and Environmental Control, Environmental Quality Control Administration	Department of Health and Environmental Control, Environmental Quality Control Administration	Independent

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
South Dakota	Department of Environment and Natural Resources	Department of Environment and Natural Resources, Division of Environmental Services	Independent
Tennessee	TN Department of Environment and Conservation, Deputy Commissioner's Office	TN Department of Environment and Conservation, Pollution Prevention/Environmental Awareness Division	Not operating
Texas	TX Natural Resource Conservation Commission	TX Natural Resource Conservation Commission	Independent
Utah	Department of Environmental Quality, Division of Air Quality, Director's Office Voluntary Assistance Program (VAP) located in SBO Office	Department of Environmental Quality, Division of Air Quality, Permits Section	Department of Environmental Quality, Division of Air Quality, SBO Office
Vermont	Department of Environment Conservation, Air Pollution Control Division	Not operating	Not operating
Virginia	Department of Environmental Quality - Air Division	Department of Environmental Quality - Air Division	Independent
US Virgin Islands	Small Business Development Agency of the Department of Tourism	Department of Planning and Natural Resources	Not established
Washington	Washington Department of Ecology	Washington Department of Ecology	Independent

TABLE D-7
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
West Virginia	WV Division of Environmental Protection	WV Division of Environmental Protection, Office of Air Quality	Independent
Wisconsin	Department of Development, Office of Permit Information and Environmental Services	Department of Development, Office of Permit Information and Environmental Services/Department of Natural Resources, Bureau of Air Management	Independent
Wyoming	Department of Environmental Quality, Administration Division	Department of Environmental Quality, Air Quality Division	Independent

TABLE D-7
(Continued)

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

STATE	CONTRACTED COMPANY
Kansas	<p>Mr. Frank Orzulak University of Kansas - Center for Environmental Education and Training Continuing Education Building University of Kansas Lawrence, KS 66045-2608 913-864-3968 913-864-5827 (fax) Budget: \$300,000 Term of Contract: 1 year</p>
Kentucky	<p>Mr. Greg Copley, Director Center for Business Development College of Business and Economics University of Kentucky 227 Business & Economics Building Lexington, KY 40506-0034 606-257-1131 606-323-1907 fax Budget: \$250,000 Term of Contract: 1 year (7/1/95-6/30/96)</p>
Pennsylvania	<p>Mr. Joseph Knox PRC Environmental Management, Inc. 1800 John F. Kennedy Boulevard Sixth Floor Philadelphia, PA 19103 215-972-0444 SBAP Hotline: 800-722-4743 215-972-0484 (fax) Budget: \$310,000 Term of Contract: 5 years</p>

APPENDIX E

SBTCP ACTIVITIES AND SERVICES

TABLE E-1
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF STATES
(DATA FROM 1995 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Dry Cleaners	29	4,096	608	4,704
Vehicle Maintenance and Repair	24	8,858	193	9,051
Printers and Printing Industry	22	2,412	105	2,517
Chrome Platers	19	837	53	890
Degreasers	18	4,837	16	4,853
Metal Fabrication/Finishing/Forging	13	4,953	106	5,059
Others (Not Identified)	12	39,250	254	39,504
Chemicals (Inorganic and Organic)	11	384	55	439
Paints and Painting	9	308	9	317
Plumbing/HVAC	9	48	25	73
Hospitals/Medical/Health Services	9	186	22	208
Gasoline Distribution (Wholesale, Retail)	9	1,707	4	1,711
Furniture Manufacturing/Repair & Sales	8	46	7	53
Plastics and Plastic Products	8	53	45	98
Sawmills, Planing, Wood Products, Etc.	8	141	29	170
Electroplating	7	119	10	129
Agriculture/Farming/Crop Services	7	67	2	69
Wood Furniture	7	189	10	199
Cut/Crushed Stone and Products	6	507	42	549
Consultants	6	881	2	883
Food Products	6	76	5	81
Construction (Commercial, Residential)	5	173	27	200
Contractors	5	118		118
Drugs/Pharmaceuticals	5	114	5	119
Government (City/County/State/Federal)	5	520	18	538
Asphalt and Asphalt Paving	5	13		13
Cutlery and Handtools	4	98		98
Schools (Colleges, Vocational, etc.)	4	92		92
Utilities	4	44	1	45
Metalworking Machinery	4	27	1	28
Manufacturers/Manufacturing	4	426	35	461
Home/Office Furniture	4	299	18	317
Textiles and Products	4	112	20	132
Cleaning/Laundry Services	4	247	122	369
Concrete	3	65	6	71
Petroleum/Petroleum Products/Storage	3	49	1	50
Attorneys/Lawyers	3	50		50
Machinery Manufacturing and Repair	3	45	5	50
Transportation Services/Equipment	3	11	0	11

TABLE E-1
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF STATES
(DATA FROM 1995 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Business Organizations/Services	3	135	2	137
Airports and Air Transportation	3	12	2	14
Foundries/Smelters	3	7	2	9
PCB/Electronics	3	15	4	19
Grain Elevators	3	268	15	283
Fiberglass Manufacturing/Products	3	13	2	15
Research and Testing Facilities	3	6		6
Paper and Paper Products	3	3	2	5
Funeral Services	3	4		4
Electric Equipment and Repair	3	111		111
Glass Manufacturing and Products	3	14	2	16
Real Estate and Agent/Operators	3	37		37
Aerospace	2	21	0	21
Media	2	14		14
Boat Manufacturing	2	4	2	6
Foam/Syntrofoam Products & Manufactur	2	2	1	3
Welding	2	9	1	10
Toys & Sporting	2	10	4	14
Printed Circuit Board Manufacturers	2	25	0	25
Mining and Mineral Processing	2	26	0	26
CFC Users	2	368		368
Private Citizen	2	215		215
Oil and Gas Producers	2	222	10	232
Miscellaneous Repair Shops	2	97		97
Waste/Waste Hauler	2	61	0	61
Suppliers/Vendors	2	200	1	201
Non Profit Organizations	2	30	0	30
Recyclers	2	28		28
Nail Salons	1	2		2
Fabricated Structural Metal	1	2		2
Landscaping	1	0	2	2
Packaging	1	2		2
Clothing	1	1		1
Ophthalmic Goods	1	1		1
Remediation	1	2		2
Hotel/Motel	1	2		2
Rubber Products	1	1		1
Pest Control	1	1		1
Household Appliances	1	1		1

TABLE E-1
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF STATES
(DATA FROM 1995 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Ceramics	1	1		1
Wastewater Facilities	1	1		1
Leather	1	1		1
Dairy Products	1	1		1
Pyrolysis Plant	1	0	1	1
Railroad Equipment	1	1		1
Screw Machinery Products	1	3		3
Maintenance	1	4		4
Coal Preparation	1	12	1	13
Livestock Feeders	1	10	2	12
Stone/Glass/Clay	1	10	9	19
Auto Wrecker Yards	1	28	0	28
Marine	1	10	5	15
Trailer Manufacturers	1	25	3	28
Cotton Gins	1	45	0	45
Title VI Impacted Businesses	1	48		48
Regulated Storage Tanks	1	584	0	584
Beauty Shops	1	3		3
Wood Treatment	1	3	1	4
Asbestos Contractors	1	10		10
Denistry	1	230	125	355
Tool and Die Industry	1	8		8
Tribal (Native American)	1	8	0	8
Tires, Scrap	1	250	0	250
Pollution Control Equipment	1	6		6
Bakery Products	1	5	15	20
Breweries	1	1		1
TOTALS		75,738	2,075	

TABLE E-2
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ASSISTANCES
(DATA FROM 1995 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Others (Not Identified)	12	39,250	254	39,504
Vehicle Maintenance and Repair	24	8,858	193	9,051
Metal Fabrication/Finishing/Forging	13	4,953	106	5,059
Degreasers	18	4,837	16	4,853
Dry Cleaners	29	4,096	608	4,704
Printers and Printing Industry	22	2,412	105	2,517
Gasoline Distribution (Wholesale, Retail)	9	1,707	4	1,711
Chrome Platers	19	837	53	890
Consultants	6	881	2	883
Regulated Storage Tanks	1	584	0	584
Cut/Crushed Stone and Products	6	507	42	549
Government (City/County/State/Federal)	5	520	18	538
Manufacturers/Manufacturing	4	426	35	461
Chemicals (Inorganic and Organic)	11	384	55	439
Cleaning/Laundry Services	4	247	122	369
CFC Users	2	368		368
Denistry	1	230	125	355
Home/Office Furniture	4	299	18	317
Paints and Painting	9	308	9	317
Grain Elevators	3	268	15	283
Tires, Scrap	1	250	0	250
Oil and Gas Producers	2	222	10	232
Private Citizen	2	215		215
Hospitals/Medical/Health Services	9	186	22	208
Suppliers/Vendors	2	200	1	201
Construction (Commercial, Residential)	5	173	27	200
Wood Furniture	7	189	10	199
Sawmills, Planing, Wood Products, Etc.	8	141	29	170
Business Organizations/Services	3	135	2	137
Textiles and Products	4	112	20	132
Electroplating	7	119	10	129
Drugs/Pharmaceuticals	5	114	5	119
Contractors	5	118		118
Electric Equipment and Repair	3	111		111
Plastics and Plastic Products	8	53	45	98
Cutlery and Handtools	4	98		98
Miscellaneous Repair Shops	2	97		97
Schools (Colleges, Vocational, etc.)	4	92		92
Food Products	6	76	5	81

TABLE E-2
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ASSISTANCES
(DATA FROM 1995 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Plumbing/HVAC	9	48	25	73
Concrete	3	65	6	71
Agriculture/Farming/Crop Services	7	67	2	69
Waste/Waste Hauler	2	61	0	61
Furniture Manufacturing/Repair & Sales	8	46	7	53
Machinery Manufacturing and Repair	3	45	5	50
Attorneys/Lawyers	3	50		50
Petroleum/Petroleum Products/Storage	3	49	1	50
Title VI Impacted Businesses	1	48		48
Cotton Gins	1	45	0	45
Utilities	4	44	1	45
Real Estate and Agent/Operators	3	37		37
Non Profit Organizations	2	30	0	30
Metalworking Machinery	4	27	1	28
Trailer Manufacturers	1	25	3	28
Auto Wrecker Yards	1	28	0	28
Recyclers	2	28		28
Mining and Mineral Processing	2	26	0	26
Printed Circuit Board Manufacturers	2	25	0	25
Aerospace	2	21	0	21
Bakery Products	1	5	15	20
PCB/Electronics	3	15	4	19
Stone/Glass/Clay	1	10	9	19
Glass Manufacturing and Products	3	14	2	16
Marine	1	10	5	15
Fiberglass Manufacturing/Products	3	13	2	15
Airports and Air Transportation	3	12	2	14
Media	2	14		14
Toys & Sporting	2	10	4	14
Asphalt and Asphalt Paving	5	13		13
Coal Preparation	1	12	1	13
Livestock Feeders	1	10	2	12
Transportation Services/Equipment	3	11	0	11
Welding	2	9	1	10
Asbestos Contractors	1	10		10
Foundries/Smelters	3	7	2	9
Tool and Die Industry	1	8		8
Tribal (Native American)	1	8	0	8
Boat Manufacturing	2	4	2	6

TABLE E-2
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ASSISTANCES
(DATA FROM 1995 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Pollution Control Equipment	1	6		6
Research and Testing Facilities	3	6		6
Paper and Paper Products	3	3	2	5
Maintenance	1	4		4
Funeral Services	3	4		4
Wood Treatment	1	3	1	4
Beauty Shops	1	3		3
Foam/Syrofoam Products & Manufactur	2	2	1	3
Screw Machinery Products	1	3		3
Landscaping	1	0	2	2
Packaging	1	2		2
Remediation	1	2		2
Hotel/Motel	1	2		2
Nail Salons	1	2		2
Fabricated Structural Metal	1	2		2
Household Appliances	1	1		1
Ceramics	1	1		1
Dairy Products	1	1		1
Pyrolysis Plant	1	0	1	1
Railroad Equipment	1	1		1
Pest Control	1	1		1
Rubber Products	1	1		1
Leather	1	1		1
Wastewater Facilities	1	1		1
Ophthalmic Goods	1	1		1
Clothing	1	1		1
Breweries	1	1		1
TOTALS		75,738	2,075	

TABLE E-3
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ON-SITE ASSISTANCES
(DATA FROM 1995 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Dry Cleaners	29	4,096	608	4,704
Others (Not Identified)	12	39,250	254	39,504
Vehicle Maintenance and Repair	24	8,858	193	9,051
Dentistry	1	230	125	355
Cleaning/Laundry Services	4	247	122	369
Metal Fabrication/Finishing/Forging	13	4,953	106	5,059
Printers and Printing Industry	22	2,412	105	2,517
Chemicals (Inorganic and Organic)	11	384	55	439
Chrome Platers	19	837	53	890
Plastics and Plastic Products	8	53	45	98
Cut/Crushed Stone and Products	6	507	42	549
Manufacturers/Manufacturing	4	426	35	461
Sawmills, Planing, Wood Products, Etc.	8	141	29	170
Construction (Commercial, Residential)	5	173	27	200
Plumbing/HVAC	9	48	25	73
Hospitals/Medical/Health Services	9	186	22	208
Textiles and Products	4	112	20	132
Home/Office Furniture	4	299	18	317
Government (City/County/State/Federal)	5	520	18	538
Degreasers	18	4,837	16	4,853
Bakery Products	1	5	15	20
Grain Elevators	3	268	15	283
Wood Furniture	7	189	10	199
Electroplating	7	119	10	129
Oil and Gas Producers	2	222	10	232
Stone/Glass/Clay	1	10	9	19
Paints and Painting	9	308	9	317
Furniture Manufacturing/Repair & Sales	8	46	7	53
Concrete	3	65	6	71
Marine	1	10	5	15
Food Products	6	76	5	81
Machinery Manufacturing and Repair	3	45	5	50
Drugs/Pharmaceuticals	5	114	5	119
Gasoline Distribution (Wholesale, Retail)	9	1,707	4	1,711
Toys & Sporting	2	10	4	14
PCB/Electronics	3	15	4	19
Trailer Manufacturers	1	25	3	28
Livestock Feeders	1	10	2	12
Agriculture/Farming/Crop Services	7	67	2	69

TABLE E-3
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ON-SITE ASSISTANCES
(DATA FROM 1995 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Consultants	6	881	2	883
Airports and Air Transportation	3	12	2	14
Business Organizations/Services	3	135	2	137
Boat Manufacturing	2	4	2	6
Paper and Paper Products	3	3	2	5
Foundries/Smelters	3	7	2	9
Fiberglass Manufacturing/Products	3	13	2	15
Landscaping	1	0	2	2
Glass Manufacturing and Products	3	14	2	16
Welding	2	9	1	10
Foam/Syrofoam Products & Manufactur	2	2	1	3
Coal Preparation	1	12	1	13
Suppliers/Vendors	2	200	1	201
Petroleum/Petroleum Products/Storage	3	49	1	50
Pyrolysis Plant	1	0	1	1
Wood Treatment	1	3	1	4
Metalworking Machinery	4	27	1	28
Utilities	4	44	1	45
Non Profit Organizations	2	30	0	30
Printed Circuit Board Manufacturers	2	25	0	25
Aerospace	2	21	0	21
Waste/Waste Hauler	2	61	0	61
Cotton Gins	1	45	0	45
Mining and Mineral Processing	2	26	0	26
Regulated Storage Tanks	1	584	0	584
Tires, Scrap	1	250	0	250
Transportation Services/Equipment	3	11	0	11
Tribal (Native American)	1	8	0	8
Auto Wrecker Yards	1	28	0	28
Screw Machinery Products	1	3		3
Rubber Products	1	1		1
Leather	1	1		1
Ophthalmic Goods	1	1		1
Beauty Shops	1	3		3
Maintenance	1	4		4
Asbestos Contractors	1	10		10
Title VI Impacted Businesses	1	48		48
Tool and Die Industry	1	8		8
Pollution Control Equipment	1	6		6

TABLE E-3
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ON-SITE ASSISTANCES
(DATA FROM 1995 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Clothing	1	1		1
Private Citizen	2	215		215
Research and Testing Facilities	3	6		6
Schools (Colleges, Vocational, etc.)	4	92		92
Attorneys/Lawyers	3	50		50
Electric Equipment and Repair	3	111		111
Funeral Services	3	4		4
Media	2	14		14
Real Estate and Agent/Operators	3	37		37
CFC Users	2	368		368
Cutlery and Handtools	4	98		98
Asphalt and Asphalt Paving	5	13		13
Contractors	5	118		118
Miscellaneous Repair Shops	2	97		97
Hotel/Motel	1	2		2
Pest Control	1	1		1
Fabricated Structural Metal	1	2		2
Wastewater Facilities	1	1		1
Dairy Products	1	1		1
Ceramics	1	1		1
Household Appliances	1	1		1
Packaging	1	2		2
Recyclers	2	28		28
Railroad Equipment	1	1		1
Nail Salons	1	2		2
Remediation	1	2		2
Breweries	1	1		1
TOTALS		75,738	2,075	

APPENDIX E-4
SUMMARY OF STATES RESPONDING TO SECTION 6.0 QUESTIONS
AND THE NUMBER OF ASSISTANCES PROVIDED

STATE	RETURNED FORM (Y/N)	COMPLETED QUESTIONS (Y/N)			RESPONSE TO QUESTION 6.1		
		6.1	6.2	6.3	# General Assistance	# On-site Assistance	Total Facilities Assisted
Alabama	Y	Y	Y	Y	33	0	33
Alaska	Y	N	N				
Arizona	Y	N	N	N			
Arkansas	Y	Y	Y	Y	875	28	903
California	Y	Y	Y	Y	10,000 + (not specified)		10,000 +
Colorado	Y	Y	Y	Y	1,670	20	940
Connecticut	Y	N	Y	Y			
Delaware	Y	N	Y	Y			
District of Columbia	Y	Y	Y	Y	45	6	51
Florida	Y	Y	N	N	83	0	83
Georgia	Y	Y	Y	Y	43	10	53
Hawaii	Y	N	N	N			
Idaho	Y	N	N	N			
Illinois	Y	N	Y	Y			
Indiana	Y	Y	Y	Y	1,800	189	1,989
Iowa	Y	Y	Y	Y	913	74	987
Kansas	Y	Y	Y	Y	244	17	261
Kentucky	Y	Y	Y	Y	36		36
Louisiana	Y	Y	Y	Y	1,003	141	1,144
Maine	Y	Y	Y	Y	1,613	5	1,618

**APPENDIX E-4
(Continued)**

STATE	RETURNED FORM (Y/N)	COMPLETED QUESTIONS (Y/N)			RESPONSE TO QUESTION 6.1		
		6.1	6.2	6.3	# General Assistance	# On-site Assistance	Total Facilities Assisted
Maryland	Y	Y	Y	Y	1,595	3	1,598
Massachusetts	Y	Y	Y	Y	5,260	13	5,273
Michigan	Y	N	Y	Y			
Minnesota	Y	N	N	N			
Mississippi	Y	Y	Y	Y	1,357	72	1,429
Missouri	Y	Y	Y	Y	1,636	134	1,770
Montana	Y	Y	Y	Y	790	69	859
Nebraska	Y	Y	Y	Y	448	46	494
Nevada	Y	N	Y	Y			
New Hampshire	Y	N	Y	Y			
New Jersey	Y	Y	Y	Y	330	214	544
New Mexico	Y	Y	Y	Y	65	16	81
New York	Y	Y	Y	Y	1,409	8	1,417
North Carolina	Y	Y	Y	Y	245	8	253
North Dakota	Y	Y	Y	Y	300	10	310
Ohio	Y	Y	Y	Y	1,292	24	1,316
Oklahoma	Y	Y	Y	Y	154	15	169
Oregon	Y	Y	Y	Y	65	4	69
Pennsylvania	Y	N	N	N			
Puerto Rico	Y	Y	Y	Y	130	200	330
Rhode Island	Y	Y	Y	Y	79	45	124

**APPENDIX E-4
(Continued)**

STATE	RETURNED FORM (Y/N)	COMPLETED QUESTIONS (Y/N)			RESPONSE TO QUESTION 6.1		
		6.1	6.2	6.3	# General Assistance	# On-site Assistance	Total Facilities Assisted
South Carolina	Y	N	Y	Y			
South Dakota	Y	Y	Y	Y	302	3	305
Tennessee	Y	Y	Y	Y	715	8	723
Texas	Y	Y	Y	Y	40,618	126	40,744
Utah	Y	Y	Y	Y	95	7	102
Vermont	Y	N	N	N			
U.S. Virgin Islands	Y	Y	Y	Y	41	20	61
Virginia	Y	Y	Y	Y	123	1	124
Washington	Y	Y	Y	Y	70	382	452
West Virginia	Y	Y	Y	Y	150	10	160
Wisconsin	Y	Y	Y	Y	281	17	298
Wyoming	Y	Y	Y	Y	1,820	4	1,824
TOTALS					77,728	1,949	78,797

TABLE E-5
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1995 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
AK		NO INFORMATION PROVIDED				
AL	Asbestos Contractors	10		10		
AL	Chemicals (Inorganic and Organic)	1		1		
AL	Chrome Platers	3		3		
AL	Cut/Crushed Stone and Products	3		3		
AL	Degreasers	5		5		
AL	Dry Cleaners	4		4		
AL	Foundries/Smelters	1		1		
AL	Gasoline Distribution (Wholesale, Retail)	4		4		
AL	Printers and Printing Industry	1		1		
AL	Wood Furniture	1		1		
AR	Concrete	81	8	87	250	26.8
AR	Dry Cleaners	8	0	8	89	8.988764
AR	Food Products	37	4	41	151	27.152318
AR	Furniture Manufacturing/Repair & Sales	12	1	13	97	13.402062
AR	Machinery Manufacturing and Repair	39	4	43	326	13.190184
AR	Metal Fabrication/Finishing/Forging	51	5	56	213	26.29108
AR	Regulated Storage Tanks	584	0	584	13,000	4.4823077
AR	Saw Mills, Planing, Wood Products, Etc.	83	8	91	789	11.533587
AZ	Aerospace	19	0	19		
AZ	Agriculture/Farming/Crop Services	2	0	2		
AZ	Airports and Air Transportation	4	1	5		
AZ	Attorneys/Lawyers	15	0	15		
AZ	Business Organizations/Services	2	2	4		
AZ	Business Organizations/Services	5	0	5		
AZ	Chemicals (Inorganic and Organic)	11	1	12		
AZ	Construction (Commercial, Residential)	34	13	47		
AZ	Consultants	107	0	107		
AZ	Dry Cleaners	14	0	14		
AZ	Electroplating	5	0	5		
AZ	Food Products	2	1	3		
AZ	Foundries/Smelters	2	0	2		
AZ	Furniture Manufacturing/Repair & Sales	3	0	3		
AZ	Government (City/County/State/Federal)	118	0	118		
AZ	Government (City/County/State/Federal)	1	0	1		
AZ	Government (City/County/State/Federal)	31	1	32		
AZ	Government (City/County/State/Federal)	36	0	36		
AZ	Government (City/County/State/Federal)	25	2	27		
AZ	Hospitals/Medical/Health Services	4	1	5		
AZ	Landscaping	0	2	2		
AZ	Machinery Manufacturing and Repair	4	1	5		
AZ	Media	13	0	13		
AZ	Metal Fabrication/Finishing/Forging	15	1	16		
AZ	Metalworking Machinery	3	0	3		
AZ	Mining and Mineral Processing	20	0	20		
AZ	Non Profit Organizations	28	0	28		
AZ	Others (Not Identified)	79	0	79		
AZ	Others (Not Identified)	134	0	134		
AZ	Paints and Painting	2	1	3		
AZ	Plastics and Plastic Products	9	0	9		
AZ	Printed Circuit Board Manufacturers	7	0	7		
AZ	Printed Circuit Board Manufacturers	3	0	3		
AZ	Printers and Printing Industry	21	2	23		
AZ	Private Citizen	209	0	209		
AZ	Recyclers	13	0	13		
AZ	Schools (Colleges, Vocational, etc.)	28	0	28		
AZ	Stone/Glass/Clay	10	9	19		
AZ	Suppliers/Vendors	19	0	19		
AZ	Textiles and Products	1	0	1		
AZ	Transportation Services/Equipment	4	0	4		
AZ	Tribal (Native American)	8	0	8		
AZ	Utilities	15	0	15		
AZ	Vehicle Maintenance and Repair	25	0	25		
AZ	Waste/Waste Hauler	4	0	4		
AZ	Wood Treatment	3	1	4		
CA		NO INFORMATION PROVIDED				
CO	Agriculture/Farming/Crop Services	20	2	22	100	22
CO	Degreasers	200	0	200		
CO	Dry Cleaners	800	10	810	900	87.777778
CO	Electroplating	10	2	12		
CO	Printers and Printing Industry	40	8	48	500	9.2
CO	Vehicle Maintenance and Repair	800	0	800	800	100
CT	Agriculture/Farming/Crop Services	2		2		
CT	Asphalt and Asphalt Paving	2		2		

TABLE E-5
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1995 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B) *100/I
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
CT	Chemicals (Inorganic and Organic)	3	3	6		
CT	Chemicals (Inorganic and Organic)	1	1	2		
CT	Chemicals (Inorganic and Organic)	150	10	160		
CT	Cleaning/Laundry Services	80	21	101		
CT	Construction (Commercial, Residential)	2		2		
CT	Construction (Commercial, Residential)	5	2	7		
CT	Construction (Commercial, Residential)	14	5	19		
CT	Consultants	237	1	238		
CT	Contractors	50		50		
CT	Cutlery and Handtools	48		48		
CT	Cut/Crushed Stone and Products	100	5	105		
CT	Cut/Crushed Stone and Products	129	16	145		
CT	Cut/Crushed Stone and Products	1		1		
CT	Drugs/Pharmaceuticals	50		50		
CT	Food Products	3		3		
CT	Funeral Services	1		1		
CT	Glass Manufacturing and Products	1	1	2		
CT	Home/Office Furniture	2	2	4		
CT	Home/Office Furniture	73	2	75		
CT	Home/Office Furniture	72	5	77		
CT	Hospitals/Medical/Health Services	2		2		
CT	Metal Fabrication/Finishing/Forging	66	13	79		
CT	Metal Fabrication/Finishing/Forging	241	21	262		
CT	Metalworking Machinery	8		8		
CT	Paper and Paper Products	1	1	2		
CT	Plastics and Plastic Products	3		3		
CT	Plumbing/HVAC	5		5		
CT	Printers and Printing Industry	3	1	4		
CT	Printers and Printing Industry	255	17	272		
CT	Research and Testing Facilities	2		2		
CT	Saw Mills, Planing, Wood Products, Etc.	13	6	19		
CT	Toys & Sporting	5	2	7		
CT	Vehicle Maintenance and Repair	4		4		
CT	Vehicle Maintenance and Repair	3		3		
DC	Dry Cleaners	45	6	51	250	20.4
DE		NO INFORMATION PROVIDED				
FL	Agriculture/Farming/Crop Services	1		1		
FL	Asphalt and Asphalt Paving	1		1		
FL	Attorneys/Lawyers	16		16		
FL	Boat Manufacturing	1		1		
FL	Business Organizations/Services	4		4		
FL	Business Organizations/Services	5		5		
FL	Chemicals (Inorganic and Organic)	1		1		
FL	Consultants	64		64		
FL	Contractors	1		1		
FL	Cutlery and Handtools	1		1		
FL	Dry Cleaners	91		91		
FL	Electric Equipment and Repair	1		1		
FL	Electric Equipment and Repair	3		3		
FL	Funeral Services	2		2		
FL	Furniture Manufacturing/Repair & Sales	2		2		
FL	Furniture Manufacturing/Repair & Sales	3		3		
FL	Gasoline Distribution (Wholesale, Retail)	3		3		
FL	Gasoline Distribution (Wholesale, Retail)	1		1		
FL	Government (City/County/State/Federal)	77		77		
FL	Hospitals/Medical/Health Services	3		3		
FL	Household Appliances	1		1		
FL	Metal Fabrication/Finishing/Forging	1		1		
FL	Metal Fabrication/Finishing/Forging	1		1		
FL	Metal Fabrication/Finishing/Forging	1		1		
FL	Metal Fabrication/Finishing/Forging	1		1		
FL	Metal Fabrication/Finishing/Forging	16		16		
FL	Miscellaneous Repair Shops	92		92		
FL	Nail Salons	2		2		
FL	Oil and Gas Producers	1		1		
FL	Others (Not Identified)	14		14		
FL	Others (Not Identified)	1		1		
FL	Paints and Painting	2		2		
FL	Paints and Painting	3		3		
FL	PCB/Electronics	11		11		
FL	Plastics and Plastic Products	7		7		
FL	Plumbing, HVAC	6		6		
FL	Printers and Printing Industry	1		1		
FL	Printers and Printing Industry	7		7		

TABLE E-5
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1995 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
FL	Private Citizen	6		6		
FL	Real Estate and Agent/Operators	6		6		
FL	Research and Testing Facilities	2		2		
FL	Rubber Products	1		1		
FL	Schools (Colleges, Vocational, etc.)	2		2		
FL	Transportation Services/Equipment	2		2		
FL	Utilities	2		2		
FL	Utilities	1		1		
FL	Vehicle Maintenance and Repair	9		9		
FL	Vehicle Maintenance and Repair	21		21		
FL	Wastewater Facilities	1		1		
GA	Chrome Platers	13	0	13	15	86.66667
GA	Degreasers	11	0	11	11	100
GA	Dry Cleaners	18	10	29	661	4.387292
HI		NO INFORMATION PROVIDED				
IA	Dry Cleaners	25	3	28	150	18.66667
IA	Grain Elevators	25	3	28	700	4
IA	Manufacturers/Manufacturing	150	20	170	2,400	7.083333
IA	Others (Not Identified)	188	9	197	2,000	9.85
IA	Printers and Printing Industry	25	6	31	700	4.428571
IA	Vehicle Maintenance and Repair	500	33	533	1,100	48.454545
ID		NO INFORMATION PROVIDED				
IL		NO INFORMATION PROVIDED				
IN	Chrome Platers	60	0	60	80	75
IN	Cut/Crushed Stone and Products	30	0	30	250	12
IN	Degreasers	40	0	40	105	38.095238
IN	Dentistry	230	125	355	230	154.34783
IN	Dry Cleaners	430	30	460	845	54.43787
IN	Hospitals/Medical/Health Services	152	20	172	152	113.15789
IN	Tires, Scrap	250	0	250	1,400	17.857143
IN	Vehicle Maintenance and Repair	608	8	618	2,000	30.8
IN	Vehicle Maintenance and Repair	0	8	8		
KS	Agriculture/Farming/Crop Services	38		38		
KS	Airports and Air Transportation	4	1	5		
KS	Chrome Platers	38	2	40		
KS	Construction (Commercial, Residential)	1		1		
KS	Drugs/Pharmaceuticals	4		4		
KS	Dry Cleaners	40	2	42	400	10.5
KS	Fiberglass Manufacturing/Products	2		2		
KS	Furniture Manufacturing/Repair & Sales	9	2	11		
KS	Hospitals/Medical/Health Services	17	1	18		
KS	Metalworking Machinery	8	1	9		
KS	Paints and Painting	14	2	16		
KS	Plumbing/HVAC	1		1		
KS	Printers and Printing Industry	38	3	39		
KS	Utilities	13	1	14		
KS	Vehicle Maintenance and Repair	18	2	20		
KY	Agriculture/Farming/Crop Services			1		
KY	Chemicals (Inorganic and Organic)			1		
KY	Chemicals (Inorganic and Organic)			1		
KY	Concrete			1		
KY	Cutlery and Handtools			1		
KY	Electric Equipment and Repair			1		
KY	Electric Equipment and Repair			1		
KY	Fabricated Structural Metal			2		
KY	Furniture Manufacturing/Repair & Sales			1		
KY	Home/Office Furniture			1		
KY	Home/Office Furniture			3		
KY	Machinery Manufacturing and Repair			1		
KY	Machinery Manufacturing and Repair			1		
KY	Metal Fabrication/Finishing/Forging			3		
KY	Ophthalmic Goods			1		
KY	Petroleum/Petroleum Products/Storage			7		
KY	Plastics and Plastic Products			1		
KY	Printers and Printing Industry			1		
KY	Railroad Equipment			1		
KY	Saw Mills, Planing, Wood Products, Etc.			3		
KY	Saw Mills, Planing, Wood Products, Etc.			3		
LA	Others (Not Identified)		141	1144		
MA	Metal Fabrication/Finishing/Forging	4000	3	4003	0	
MA	PCB/Electronics		4	4	0	
MA	Printers and Printing Industry	1040	8	1048	800	100
MA	Vehicle Maintenance and Repair	280	1	281	0	
MD	Chrome Platers	20	0	20	20	100

TABLE E-5
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1995 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B) *100/(C)
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
MD	Degreasers	200	0	200	50,000	0.4
MD	Dry Cleaners	25	3	28	750	3.733333
MD	Gasoline Distribution (Wholesale, Retail)	500	0	500	5,000	10
MD	Others (Not Identified)	50	0	50	100,000	0.05
MD	Vehicle Maintenance and Repair	800	0	800	2,000	40
ME	CFC Users	365		365	8,000	
ME	Degreasers	1150	4	1154	1,154	
ME	Paints and Painting	98	1	99	99	100
MI		NO INFORMATION PROVIDED				
MN	Others (Not Identified)	2718	70	2788		
MO	Agriculture/Farming/Crop Services	2		2		
MO	Asphalt and Asphalt Paving	2		2		
MO	Chemicals (Inorganic and Organic)	150	10	160		
MO	Chemicals (Inorganic and Organic)	3	3	6		
MO	Cleaning/Laundry Services	80	21	101		
MO	Construction (Commercial, Residential)	2		2		
MO	Construction (Commercial, Residential)	14	5	19		
MO	Construction (Commercial, Residential)	5	2	7		
MO	Consultants	237	1	238		
MO	Contractors	50		50		
MO	Cutlery and Handtools	48		48		
MO	Cut/Crushed Stone and Products	100	5	105		
MO	Cut/Crushed Stone and Products	1		1		
MO	Cut/Crushed Stone and Products	129	18	145		
MO	Drugs/Pharmaceuticals	50		50		
MO	Food Products	3		3		
MO	Funeral Services	1		1		
MO	Glass Manufacturing and Products	1	1	2		
MO	Home/Office Furniture	72	5	77		
MO	Home/Office Furniture	73	2	75		
MO	Home/Office Furniture	2	2	4		
MO	Hospitals/Medical/Health Services	2		2		
MO	Metal Fabrication/Finishing/Forging	66	13	79		
MO	Metal Fabrication/Finishing/Forging	241	21	262		
MO	Metalworking Machinery	8		8		
MO	Paper and Paper Products	1	1	2		
MO	Plastics and Plastic Products	3		3		
MO	Plumbing/HVAC	5		5		
MO	Printers and Printing Industry	255	17	272		
MO	Printers and Printing Industry	3	1	4		
MO	Research and Testing Facilities	2		2		
MO	Saw Mills, Planing, Wood Products, Etc.	13	6	19		
MO	Toys & Sporting	5	2	7		
MO	Vehicle Maintenance and Repair	3		3		
MO	Vehicle Maintenance and Repair	4		4		
MS	Chrome Platers	10	0	10	15	66.666667
MS	Degreasers	20	0	20	30	66.666667
MS	Degreasers	1004	0	1004	1500	66.933333
MS	Dry Cleaners	323	72	395	385	100
MT	Chrome Platers		8	8	8	100
MT	Dry Cleaners	66	30	96	96	100
MT	Printers and Printing Industry	271	7	278	350	79.428571
MT	Vehicle Maintenance and Repair	342	23	365	500	73
MT	Wood Furniture	111	1	112	1124	9.9644128
NC	Boat Manufacturing	3	2	5	100	5
NC	Chrome Platers	40	1	41	100	41
NC	Cotton Gins	45	0	45	45	100
NC	Cut/Crushed Stone and Products	5	0	5	40	12.5
NC	Degreasers	8	0	8		
NC	Dry Cleaners	100	3	103	500	20.6
NC	Electric Equipment and Repair	100	0	100	100	100
NC	Electric Equipment and Repair	5	0	5	100	5
NC	Gasoline Distribution (Wholesale, Retail)	> 1,000	0	> 1,000	> 1,000	100
NC	Grain Elevators	35	0	35	100	35
NC	Metal Fabrication/Finishing/Forging	5	3	8		
NC	Printers and Printing Industry	3	1	4		
NC	Saw Mills, Planing, Wood Products, Etc.	4	4	8	500	1.6
NC	Textiles and Products	50	2	52	210	24.761905
NC	Textiles and Products	50	3	53	200	26.5
NC	Wood Furniture	5	3	8	500	1.6
ND	Degreasers	8		8	6	100
ND	Electroplating	11		11	3	100
ND	Gasoline Distribution (Wholesale, Retail)	10		10	5	100
ND	Oil and Gas Producers	221	10	231		

TABLE E-5
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1995 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/L
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
ND	Wood Furniture	52		52	52	100
NE	Degreasers	28	1	29		>5
NE	Dry Cleaners	12	2	14	234	5.982906
NE	Electroplating	8	1	9	11	81.818182
NE	Fiberglass Manufacturing/Products	6	2	8	12	66.666667
NE	Government (City/County/State/Federal)	130	15	145	535	27.102804
NE	Grain Elevators	208	12	220	470	46.808511
NE	Livestock Feeders	10	2	12	>7,500	>1
NE	Manufacturers/Manufacturing	28	8	36		>5
NE	Vehicle Maintenance and Repair	10	2	12		>1
NE	Welding	8	1	9	>290	>1
NH		NO INFORMATION PROVIDED				
NJ	Asphalt and Asphalt Paving	2		2		
NJ	Bakery Products	5		20		
NJ	Beauty Shops	3		3		
NJ	Chemicals (Inorganic and Organic)	1		1		
NJ	Chemicals (Inorganic and Organic)	3		3		
NJ	Chemicals (Inorganic and Organic)	2		2		
NJ	Chemicals (Inorganic and Organic)	7		17		
NJ	Cleaning/Laundry Services	85		165		
NJ	Dairy Products	1		1		
NJ	Drugs/Pharmaceuticals	3		8		
NJ	Food Products	2		2		
NJ	Food Products	3		3		
NJ	Furniture Manufacturing/Repair & Sales	1		1		
NJ	Gasoline Distribution (Wholesale, Retail)	13		18		
NJ	Gasoline Distribution (Wholesale, Retail)	8		6		
NJ	Glass Manufacturing and Products	10		10		
NJ	Glass Manufacturing and Products	2		2		
NJ	Government (City/County/State/Federal)	2		2		
NJ	Home/Office Furniture	1		1		
NJ	Hospitals/Medical/Health Services	1		1		
NJ	Hotel/Motel	2		2		
NJ	Metal Fabrication/Finishing/Forging	20		20		
NJ	Metal Fabrication/Finishing/Forging	4		4		
NJ	Metal Fabrication/Finishing/Forging	3		3		
NJ	Metal Fabrication/Finishing/Forging	5		5		
NJ	Miscellaneous Repair Shops	3		3		
NJ	Others (Not Identified)	3		3		
NJ	Others (Not Identified)	3		3		
NJ	Paints and Painting	4		4		
NJ	Petroleum/Petroleum Products/Storage	3		4		
NJ	Plastics and Plastic Products	15		45		
NJ	Plastics and Plastic Products	5		20		
NJ	Plumbing/HVAC	8		28		
NJ	Printers and Printing Industry	2		2		
NJ	Printers and Printing Industry	14		34		
NJ	Real Estate and Agent/Operators	13		13		
NJ	Real Estate and Agent/Operators	7		7		
NJ	Recyclers	15		15		
NJ	Schools (Colleges, Vocational, etc.)	3		3		
NJ	Schools (Colleges, Vocational, Etc.)	18		18		
NJ	Schools (Colleges, Vocational, Etc.)	18		18		
NJ	Screw Machinery Products	3		3		
NJ	Vehicle Maintenance and Repair	15		30		
NM	Chrome Platers	30	3	33	4	100
NM	Degreasers	900	3	903	50	100
NM	Dry Cleaners	85	18	81	71	100
NV		NO INFORMATION PROVIDED				
NY	Airports and Air Transportation	4		4	79	5.0632911
NY	Attorneys/Lawyers	19		19		
NY	Breweries	1		1	5	20
NY	Business Organizations/Services	12		12		
NY	Business Organizations/Services	77		77		
NY	Business Organizations/Services	21		21		
NY	Business Organizations/Services	9		9		
NY	Ceramics	1		1	294	0.3401361
NY	Chemicals (Inorganic and Organic)	8		8	875	0.8888888
NY	Cleaning/Laundry Services	2		2		
NY	Clothing	1		1	944	0.1058322
NY	Construction (Commercial, Residential)	98		98		
NY	Consultants	229		229		
NY	Contractors	14		14		
NY	Drugs/Pharmaceuticals	7		7	87	10.447781
NY	Dry Cleaners	38		38	4,536	0.8377425

TABLE E-5
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1995 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/(C)
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
NY	Food Products	26		26	543	4.7882136
NY	Gasoline Distribution (Wholesale, Retail)	64		64	4,477	1.4295287
NY	Government (City/County/State/Federal)	102		102		
NY	Leather	1		1	78	1.2820513
NY	Maintenance	4		4		
NY	Media	1		1		
NY	Metal Fabrication/Finishing/Forging	78		78	2,120	3.6792453
NY	Non Profit Organizations	2		2		
NY	Others (Not Identified)	181	7	188	2,077	9.0515186
NY	Others (Not Identified)	65		65		
NY	Packaging	2		2	2	100
NY	Paints and Painting	19		19		
NY	Paper and Paper Products	1		1	391	0.2557545
NY	Pest Control	1		1		
NY	Petroleum/Petroleum Products/Storage	39		39	154	25.324675
NY	Plastic and Plastic Products	1		1		
NY	Plastics and Plastic Products	9		9	442	2.0361991
NY	Plumbing, HVAC	5		5		
NY	Pollution Control Equipment	8		8		
NY	Printed Circuit Board Manufacturers	15		15	596	2.5167785
NY	Printers and Printing Industry	122	1	123	3,824	3.2165272
NY	Printers and Printing Industry	5		5	387	1.2919897
NY	Real Estate and Agent/Operators	11		11		
NY	Remediation	2		2		
NY	Saw Mills, Planing, Wood Products, Etc.	20		20	268	7.4626866
NY	Saw Mills, Planing, Wood Products, Etc.	1		1	424	0.2358491
NY	Schools (Colleges, Vocational, etc.)	27		27		
NY	Textiles and Products	1		1	272	0.3676471
NY	Tool and Die Industry	8		8	1,307	0.8120888
NY	Transportation Services/Equipment	5		5	220	2.2727273
NY	Utilities	13		13		
NY	Vehicle Maintenance and Repair	14		14	2,423	0.5777961
NY	Vehicle Maintenance and Repair	20		20	1,511	1.3236287
NY	Welding	1		1		
OH	Chrome Platers	305	3	308		
OH	Degreasers	700	0	700		
OH	Dry Cleaners	20	4	24		
OH	Foundries/Smelters	4	2	6		
OH	Metal Fabrication/Finishing/Forging	115	10	125		
OH	Printers and Printing Industry	140	0	140		
OH	Vehicle Maintenance and Repair	4	3	7		
OH	Wood Furniture	4	2	6		
OK	Degreasers	70	5	75		
OK	Dry Cleaners	10	1	11	900	1.8333333
OK	Electroplating	20	3	23	35	65.714286
OK	Trailer Manufacturers	25	3	28	100	28
OK	Vehicle Maintenance and Repair	25	0	25	2,500	1
OK	Wood Furniture	4	3	7	170	4.1178471
OR	CFC Users	3		3	785	0.3821656
OR	Chrome Platers	11		11	53	20.754717
OR	Contractors	3		3	58	5.1724138
OR	Fiberglass Manufacturing/Products	5		5	730	0.6849315
OR	Foam/Styrofoam Products & Manufacturin	2		2	178	1.1235955
OR	Furniture Manufacturing/Repair & Sales	5	1	6	250	2.4
OR	Hospitals/Medical/Health Services	2		2	158	1.2658228
OR	Paints and Painting	7		7	8	87.5
OR	Paints and Painting	8		8	150	5.3333333
OR	PCB/Electronics	4		4	2,183	0.1832341
OR	Printers and Printing Industry	4	1	5	350	1.4285714
OR	Vehicle Maintenance and Repair	2		2	894	0.2237138
OR	Vehicle Maintenance and Repair	9		9	418	2.1634815
PA		NO INFORMATION PROVIDED				
PR	Chemicals (Inorganic and Organic)	30	15	45	56	81.818182
PR	Chrome Platers	40	25	65	100	85
PR	Dry Cleaners	60	30	90	125	72
RI	Chemicals (Inorganic and Organic)	1	2	3	56	5.1724138
RI	Chrome Platers	0	2	2	20	10
RI	Marine	10	5	15	40	37.5
RI	Metal Fabrication/Finishing/Forging	20	15	35	313	11.182109
RI	Printers and Printing Industry	3	4	7	80	11.666667
RI	Sawmills, Planing, Wood Products, Etc.	0	2	2	107	1.8691569
RI	Textiles and Products	10	15	25	108	23.148148
RI	Vehicle Maintenance and Repair	35	0	35	400	8.75
SC		NO INFORMATION PROVIDED				

TABLE E-5
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1995 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
SD	Chrome Platers	32	1	33	32	103.125
SD	Degreasers	260	0	260	260	100
SD	Dry Cleaners	10	2	12	75	16
TN	Chrome Platers	70	3	73	70	100
TN	Degreasers	11	1	12	11	100
TN	Dry Cleaners	185	3	188	700	26.857143
TN	Others (Not Identified)	260		260	3,000	8.666667
TN	Printers and Printing Industry	70	4	74	1,200	6.166667
TN	Title VI Impacted Businesses	48		48		
TX	Chrome Platers	116	4	120	130	92.307692
TX	Dry Cleaners	1792		1792	3,314	54.073627
TX	Gasoline Distribution (Wholesale, Retail)	101		101	3,710	2.722372
TX	Manufacturers/Manufacturing	238	4	242	11,069	2.186286
TX	Others (Not Identified)	34532	27	34559	32,136	107.53863
TX	Paints and Painting	138	4	142		
TX	Printers and Printing Industry	33	0	33	3,247	1.0163228
TX	Suppliers/Vendors	181	1	182		
TX	Vehicle Maintenance and Repair	3430	86	3516	6,384	54.989052
TX	Waste/Waste Hauler	57		57		
UT	Dry Cleaners	15	0	15	200	7.5
UT	Furniture Manufacturing/Repair & Sales	10	3	13	200	6.5
UT	Plumbing/HVAC	10		10		
UT	Printers and Printing Industry	45	3	48	270	17.777778
UT	Vehicle Maintenance and Repair	15	1	16	257	6.2256809
VA	Degreasers	35	0	35		
VA	Dry Cleaners	40	0	40	750	5.3333333
VA	Electroplating	45	1	46	80	57.5
VA	Hospitals/Medical/Health Services	3	0	3		
VI	Dry Cleaners	18	0	18	18	100
VI	Plumbing, HVAC	5	5	10	84	11.904762
VI	Printers and Printing Industry	10	5	15	32	46.875
VI	Vehicle Maintenance and Repair	10	10	20	195	10.25641
VT		NO INFORMATION PROVIDED				
WA	Chrome Platers	23	0	23	23	100
WA	Degreasers	22	0	22	22	100
WA	Dry Cleaners	25	390	405	850	47.647059
WA	Foam/Styrofoam Products & Manufacturin	0	1	1	2	50
WA	Pyrolysis Plant	0	1	1	1	100
WI	Aerospace	2	0	2	150	1.3333333
WI	Chemicals (Inorganic and Organic)	12	0	12	50	24
WI	Chrome Platers	22	1	23	120	19.166667
WI	Cut/Crushed Stone and Products	9	0	9	150	6
WI	Degreasers	187	2	189	2,000	8.45
WI	Vehicle Maintenance and Repair	46	3	49	400	12.25
WI	Wood Furniture	12	1	13	425	3.0588235
WV	Asphalt and Asphalt Paving	8		8	100	8
WV	Coal Preparation	12	1	13	450	2.8888889
WV	Concrete	3		3		
WV	Consultants	7		7		
WV	Dry Cleaners	11		11	100	11
WV	Electroplating	20	3	23	23	100
WV	Gasoline Distribution (Wholesale, Retail)	5	1	6		
WV	Manufacturers/Manufacturing	10	3	13		
WV	Metal Fabrication/Finishing/Forging	5	1	6		
WV	Mining and Mineral Processing	6		6	50	12
WV	Others (Not Identified)	19		19		
WV	Paints and Painting	13	1	14		
WV	Plumbing, HVAC	5		5		
WV	Printers and Printing Industry	2		2		
WV	Vehicle Maintenance and Repair	26		26		
WY	Auto Wrecker Yards	28	0	28	28	100
WY	Chrome Platers	4	0	4	4	100
WY	Dry Cleaners	7	1	8	40	20
WY	Saw Mills, Planing, Wood Products, Etc.	1	3	4	6	66.666667
WY	Vehicle Maintenance and Repair	1780	0	1780		

**TABLE E-6
SBO OUTREACH ACTIVITIES**

Program	Number of Services Provided / Number of Businesses or Individuals Reached																	
	Meetings		Speaking Events		Brochures/ Flyers		Training Sessions		On-site Visits ^a		Information Booths		Press Releases/ Media Coverage		Correspondence		Other	
AL	-	-	19	998	-	-	-	-	1	10	-	-	-	-	-	-	-	-
AK	-	-	2	150	-	-	-	-	-	-	3	500	-	-	-	-	-	-
AZ	12	35	27	1,080	8	6,200	10	418	-	-	-	-	-	-	-	-	41	41
AR	60	300	2	75	-	-	38	875	-	-	-	-	-	-	-	-	2 1	2 45
CA	50 +	400 +	3	250 +	20 +	1,000s	6	1,000s	-	-	-	-	-	-	100s	100s	-	-
CO	8	40-60	3	30-40	16	1,800	2	10	-	-	-	-	-	-	-	-	8 ND 5	500 700 49,250 28
CT	15	650	10	500	5	5,000	10	1,200	-	-	-	-	-	-	-	-	-	-
DE	-	-	-	-	Yes	ND	-	-	-	-	-	-	-	-	-	-	-	-
DC	1	52	-	-	1	ND	1	ND	4	8	-	-	-	-	-	-	-	-
FL	Yes	ND	Yes	ND	Yes	ND	Yes	ND	-	-	-	-	-	-	-	-	-	-
GA	31	100 ^b	9	500 +	5	1,000 +	2	200	-	-	-	-	-	-	-	-	-	-
HI	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ID	10	250 ^b	3	95 ^b	3	3,500	6	310	-	-	-	-	-	-	-	-	-	-
IL	35	50	10	150	25	10,000	-	-	-	-	-	-	-	-	-	-	-	-
IN	20 ^b	50	5 ^b	500 ^b	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IA	12	300 ^b	2	50 ^b	27,000	ND	9	250	-	-	1	25,000 ^b	5	ND	-	-	52	ND
KS	5	65	4	310	2	5,000 +	7	ND	-	-	-	-	7	ND	-	-	17	17
KY	48	100	12	400	1	1,190	1	40	-	-	-	-	5	14,650	19	19	17	17
LA	300	6,500	160	2,500	4	8,000	10	250	-	-	-	-	4	1,000,000 +	500	500	-	-
ME	Yes	ND	Yes	ND	Yes	ND	Yes	ND	-	-	-	-	-	-	-	-	-	-
MD	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MA	14	1,100 ^b	12	950	Yes	ND	5	152	-	-	-	-	-	-	-	-	-	-
MI	4	ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MN	25 ^b	1,000 ^b	5 ^b	200	2	500	10 ^b	1,000	-	-	10 ^b	3,000	5-8	1,000 ^b	-	-	-	-

TABLE E-6
(Continued)[illegible]

**TABLE E-6
(Continued)**

Program	Number of Services Provided / Number of Businesses or Individuals Reached																	
	Meetings		Speaking Events		Brochures/ Flyers		Training Sessions		On-site Visits ^a		Information Booths		Press Releases/ Media Coverage		Correspondence		Other	
WA	8	ND	2	ND	3	ND	3	ND	-	-	4	ND	-	-	-	-	-	-
WV	Yes	ND	Yes	ND	Yes	ND	Yes	ND	-	-	Yes	ND	-	-	-	-	Yes	ND
WI	14	50	6	650	3	1,200	-	-	-	-	-	-	-	-	-	-	1	40
WY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL ¹	1,244	16,028	424	19,865	32,342	166,939	683	7,999	65	72	41	39,774	105	1,594,650	4,647	1,323	656	127,594

- a Includes on-site audits and inspections.
- b Estimated.
- c 2 at 14 sites.
- d 1 at 9 sites.
- e Due to staff turnover, SBO activities were transferred to the director's office in 11/95. No record of previous activities could be located.
- f Average of 8 per month.
- g Average of 79 per month. Combined total for SBO and SBAP.
- h Included in number reported for meetings.
- i Average of 2,522 per month. Combined total for SBO and SBAP.
- j Responses to requests for assistance. Average of 277 per month.
- k Includes reported quantities of 27,000 for Iowa and 5,000 for Ohio.
- l Totals do not reflect programs indicating a "yes" answer or programs indicating a number such as "500+."
- ND Not determined.

Other activities:

- AZ: Permit application assistance.
- AR: Technical evaluations.
Water line extensions.
- CO: Outreach on state legislation.
Environmental fax network.
- IA: Contacts with Chambers of Commerce offices.
- KS: Development of a small business working group.
- KY: Compliance assistance.
- MT: Teleconferences.
- NY: Mailings about regulations.
Teleconferences.
Support group seminars.
- PA: Mailing about regulations.
- SD: Mailings about regulations.
- VA: Participation in regulation development.
- WV: Environmental Assistance Coalition and Panel Secretariat.
- WI: Teleconference.

**TABLE E-7
SBO TOLL-FREE HOTLINE INFORMATION**

PROGRAM	NATIONAL	IN-STATE ONLY
Alabama	800-533-2336	-
Alaska		800-510-2332
Arizona		800-234-5677
Arkansas	None	
California		800-272-4572
Colorado	800-333-7798	
Connecticut	None	
Delaware	-	800-789-4599
District of Columbia	None	
Florida	-	800-722-7457
Georgia	None	
Hawaii	None	
Idaho	None	
Illinois	None	
Indiana		800-451-6027
Iowa	800-358-5510	
Kansas	800-357-6087	
Kentucky	800-926-8111	-
Louisiana	-	800-256-1488
Maine		800-789-9802
Maryland	None	
Massachusetts	None	-
Michigan	None	-
Minnesota	-	800-985-4247
Mississippi	800-725-6112	
Missouri	None	-
Montana	800-433-8773	
Nebraska	None	
Nevada	-	800-992-0900 Ext. 4670
New Hampshire	-	800-837-0656

TABLE E-7
(Continued)

PROGRAM	NATIONAL	IN-STATE ONLY
New Jersey	800-643-6090	
New Mexico	800-810-7227	
New York		800-782-8369
North Carolina	800-829-4841	
North Dakota		800-755-1625
Ohio	-	800-225-5051
Oklahoma	None	
Oregon		800-452-4011
Pennsylvania	None	
Puerto Rico		Not reported
Rhode Island	-	800-932-1000
South Carolina	800-819-9001	-
South Dakota		800-438-3367
Tennessee	-	800-734-3619
Texas	800-447-2827	
Utah		800-270-4440
Vermont	None	
Virginia		800-592-5482
Virgin Islands	None	-
Washington	None	
West Virginia	-	800-982-2474
Wisconsin	800-435-7287	-
Wyoming	None	-

**TABLE E-8
SBAP OUTREACH ACTIVITIES**

Program	Number of Services Provides / Number of Businesses or Individuals Reached																	
	General		On-Site Visits		Seminars, Workshops, Meetings, etc.		Fact Sheets, Manuals, Information Packets		Newsletters		Pollution Prevention Assistance		Permit and Compliance Assistance		Teleconferences		Other	
AL	250	250	-	-	50	1,200	3	655	-	-	-	-	-	-	-	-	-	-
AK	Yes	ND	2	2	Yes	650	Yes	ND	-	-	-	-	-	-	-	-	Yes	ND
AZ	1,122	1,122	41	41	10	418	8	6,200	-	-	-	-	-	-	41	41	-	-
AR	-	-	-	-	100	1,250	-	-	-	-	-	-	-	-	-	-	2 1	2 45
CA	500 +	500 +	Yes	ND	Yes	ND	Yes	ND	-	-	-	-	-	-	-	-	Yes	ND
CO	600	600	20	20-25	25	400-500	16	1,800	-	-	-	-	-	-	-	-	2	80
CT	520-1,575 ^{ab}	735	Limited	-	12	1,200	10	1,000	-	-	-	-	20	20	-	-	5	6
DE	Yes	ND	Yes	ND	Yes	ND	Yes	ND	-	-	-	-	-	-	-	-	-	-
DC	-	-	Yes	ND	1	54	Yes	ND	-	-	-	-	-	-	-	-	-	-
FL	Yes	ND	-	-	Yes	ND	Yes	ND	-	-	-	-	-	-	-	-	-	-
GA	675	675	14	14	41	1,000 +	5	1,500 +	-	-	-	-	-	-	-	-	-	-
HI	-	-	-	-	Yes	ND	-	-	-	-	-	-	-	-	-	-	-	-
ID	Yes	ND	Yes	ND	Yes	ND	Yes	ND	-	-	-	-	-	-	-	-	-	-
IL	5	1,350	-	-	20	1,300	325	800	-	-	-	-	-	-	1	35	-	-
IN	ND	1,000	-	-	40	1,500	3	25,000	-	-	-	-	-	-	-	-	1 1	2,673 787
IA	887	ND	74	ND	16	ND	4	ND	-	-	Yes	ND	144	ND	-	-	-	-
KS	236	235	21	21	25	200 +	6	3,800 +	ND	7,000	-	-	-	-	-	-	-	-
KY	Yes	ND	31	23	41	ND	20	ND	-	-	-	-	-	-	-	-	5	ND
LA	1,003	1,003	141	141	8	64	Yes	ND	4	8,000 +	-	-	-	-	1	27	-	-
ME	358	358	7	7	15	485	3	1,378	-	-	-	-	-	-	-	-	-	-
MD	250	250	10	10	18	1,100	5,000	5,000	-	-	-	-	150	150	-	-	6	1,000
MA	120 ^a	100 ^a	11	11	14	500 ^a	3	5,325	-	-	-	-	-	-	-	-	-	-
MI	529	529	16	16	31	2,287	588	588	-	-	-	-	-	-	2	198	-	-
MN	4,017	4,017	70	70 +	Yes	1,000-5,000	-	-	-	-	-	-	-	-	-	-	-	-

(Continued)

Program	Number of Services Provides / Number of Businesses or Individuals Reached																	
	General		On-Site Visits		Seminars, Workshops, Meetings, etc.		Fact Sheets, Manuals, Information Packets		Newsletters		Pollution Prevention Assistance		Permit and Compliance Assistance		Teleconferences		Other	
MS	3,120	3,120	17	17	4	148	6	45,103	-	-	-	-						
MO	1,637	1,637	138	138	39	39	Yes	ND	-	-	-		-					
MT	1,261	1,261	101	75	76	1,000	39	1,000	-	-	-	-	-	-				
NE	554	554	35	35	36	1,496	2	2,420	-	-	-		-					
NV	2 ^a	10 ^a	Yes	ND	Yes	ND	Yes	ND	-	-	-		-					
NH	375 ^a	325 ^a	24 ^a	24 ^a	8 ^a	220 ^a	1 ^a	300 ^a	-	-	-		-					
NJ	350	250	-	-	26	360	365	365	-	-	-		-					
NM	108	125	30	25	12	250	2	1,500	3	3,000	8	20	20	20				
NY	ND	610	ND	8	24	1,272	Yes	ND	-	-	-	-	-					
NC	200	200	20	20	12	750	5	ND	-	-	-		-					
ND	ND	500-1,000	2	2	7	70	10	400 ^a	-	-	-		-				520 780 ^{ab}	500
OH	Yes	ND	24	24	-	-	Yes	ND	-	-	-		-					
OK	3,000 ^a	3,000 ^a	50	50	20	300	5	100	-	-	-		-					
OR	110	110 +	4	4	44	301	50	4,442	-	-	-		-					
PA	1,356	900 ^a	18	18	4	20	10	74		-	-		2	2			Yes 15	ND 15
PR	Yes	ND	-	-	3	200 ^a	Yes	200 ^a	-	-	-	-	-					
RI	50	50	15	15	4	185	3	100	-	-	-		-					
SC	Yes	ND	Yes	ND	Yes	ND	Yes	ND	-	-	-	-	-					
SD	50	50	12	ND	20	100	4	800	-	-	-		-					
TN	900	900	45	40	91	2,200	10	1,300	-	-	-	-	-				1	500
TX	ND	324 ^o	17	17	96 ^d	948 ^o	ND	30,264 ^f	-	-	-	-	62	62				
UT	ND	620	15	15	18	530	6	2,405	-	-		-	ND	90			4 ND	20 527
VT	-	-	-	-	-	-	-	-	-	-	-	-	-					
VA	Yes	ND	3	3	31	195	2	ND	-	-	-	-	-				Yes	ND

**TABLE E-8
(Continued)**

Program	Number of Services Provides / Number of Businesses or Individuals Reached																	
	General		On-Site Visits		Seminars, Workshops, Meetings, etc.		Fact Sheets, Manuals, Information Packets		Newsletters		Pollution Prevention Assistance		Permit and Compliance Assistance		Teleconferences		Other	
VI	50	50	50	50	3	50	50	50	-	-	-	-	-	-	-	-	-	-
WA	150	ND	4	ND	15	ND	3	ND	-	-	-	-	-	-	-	-	-	-
WV	150	120	10	10	6	15	ND	800 ^a	-	-	-	-	7	7	-	-	-	-
WI	323	323	19	19	83	2,040	22	16,505	-	-	-	-	-	-	-	-	-	-
WY	100	100	1	1	3	75	10	1,780	-	-	1	1	4	4	-	-	-	-
TOTAL^g	25,823	28,363	1,112	991	1,152	31,472	6,599	162,954	7	18,000	9	21	409	355	45	301	823	6,154

a Estimated.

b Average of 2 to 3 per day. Combined total for SBO and SBAP.

c Average of 27 per month. Combined total for SBO and SBAP.

d Average of 8 per month. Combined total for SBO and SBAP.

e Average of 78 per month. Combined total for SBO and SBAP.

f Average of 2,522 per month. Combined total for SBO and SBAP.

g Totals do not reflect programs answering "Yes" only or answers such as "500 +."

ND Not determined.

Other activities:

AK: Sector-based efforts (Pitstops)
Technical Reference Center

AR: Technical evaluations.
Water line extensions.

CA: Meeting and coordinating with regional permit assistance centers

CO: Staff training

CT: Enforcement negotiations.

IN: Faxback and customer connect services.

KY: Information booth.

MD: Information booth.

ND: Referrals to Small Business Resource Centers

PA: Referrals to Small Business Resource Centers
Loan programs.

TN: Surveys.

UT: Advisement panel.
Amnesty program.

VA: Regulation development.

**TABLE E-9
SBAP TELEPHONE HOTLINE INFORMATION**

PROGRAM	TOLL-FREE		NOT TOLL-FREE
	NATIONAL	IN-STATE ONLY	
Alabama	800-533-2336		
Alaska		800-510-2332	
Arizona		800-234-4337 Ext. 4337	
Arkansas	None		
California		800-272-4572	
Colorado	None		
Connecticut		800-760-7036	
Delaware		800-789-4599	
District of Columbia			202-645-6093 Ext. 3071
Florida		800-722-7457	
Georgia	None		-
Hawaii	None		
Idaho	None		
Illinois		800-252-3998	
Indiana		800-451-6027	
Iowa	800-422-3109		
Kansas	800-578-8898		-
Kentucky	800-562-2327	-	
Louisiana	-	800-259-2890	
Maine	-	800-789-9802	-
Maryland	800-433-1247		
Massachusetts	None	-	
Michigan	800-662-9278	-	-
Minnesota	-	800-657-3938	
Mississippi	None	-	
Missouri	800-361-4827		-
Montana	800-433-8773	-	-
Nebraska	None	-	-

TABLE E-9
(Continued)

PROGRAM	TOLL-FREE		NOT TOLL-FREE
	NATIONAL	IN-STATE ONLY	
Nevada		800-992-0900 Ext. 4670	
New Hampshire		800-837-0656	
New Jersey			609-292-3600
New Mexico	800-810-7227		
New York		800-780-7227	
North Carolina	800-829-4841		
North Dakota		800-755-1625	
Ohio			Not reported
Oklahoma	800-869-1400		
Oregon		800-452-4011	
Pennsylvania	800-722-4743		
Puerto Rico			787-767-8025
Rhode Island		800-543-4674	
South Carolina	800-819-9001		
South Dakota	None	-	
Tennessee		800-734-3619	
Texas	800-447-2827	-	
Utah	800-270-4440		
Vermont	None		
Virginia	-	800-592-5482	
Virgin Islands	None	-	
Washington		-	360-407-6803
West Virginia		800-982-2474	
Wisconsin	800-435-7287	-	
Wyoming	None		

**TABLE E-10
INFORMATION ON STATE SBAP ELECTRONIC BULLETIN BOARDS OR WEB PAGES**

PROGRAM	BULLETIN BOARD OR WEB PAGE ADDRESS	USAGE DURING REPORT PERIOD	INFORMATION AVAILABLE				
			Regulations	P2 Information	Application Forms	Policies	Other
California	916-322-2826 (by telephone) http://arbis.arb.gov	1,045	X				X
Illinois	217-787-6255, Settings: 8,N ANSI,1 http://www.accessil.com/dcca	500	X	X	X	-	X
Louisiana	504-763-3976	ND	X	X	X	X	X
Massachusetts	OTA Online: 617-727-5621	52	X	X			X
Missouri	http://www.state.mo.us/dnr/deq/smbus.htm	ND	-	-	-	-	X
New Jersey	NJDEP BBS, Air Small Business: 609-292-2006	ND	X	-	-	-	X
New Mexico	505-827-1552	2,000	X	-	X	X	X
Ohio	Division of Air Pollution BBS: 614-644-3901 Web home page: http://arcboy.epa.ohio.gov	ND	X	X	X	-	X
Pennsylvania	1-800-864-7594 Settings: N, 8,1, Full	1,668	X	X	X	X	X
Texas	TNRCCBB: 512-239-0700 SBAP home page: http://www.state.tx.us/homepgs/smbus.html	400 (home page)	X	X		-	X
Utah	http://www.its.state.ut.us/~deq/hmpgs/2lyrhmpg/smlbus.html	ND	X	X	-	-	-
West Virginia	304-558-3053	ND	X	-	X	-	X
Wyoming	DEQ/AQD: 307-777-5465	ND	X	X	-	-	X

ND = Not determined

- = Not reported.

Bulletin board comments:

CA: Feedback has been received and is carefully considered.

IL: Users requested multi-media permit forms

PA: A few callers commented on the usefulness of the service, especially the 24-hour access.
A few messages suggested specific documents to be placed on the bulletin board.

**TABLE E-11
MAJOR CAP ACTIVITIES**

State	Review of documents for readability and/or content	Appointment/hiring of staff and/or election of officers	Review of SBO/SBAP outreach efforts	Review/comment on proposed/new regulations ^a	Definition of CAP responsibilities ^b	Attendance by CAP members at training sessions, etc.	Advisement about effective outreach activities ^c	Assessing small business concerns based on contacts	Other (See below)
AL	-	-	-	-	-	-	-		-
AK	-	-	-	-	-	-	-		-
AZ	-	X	-	-	-	-	-		-
AR	-	X	-	-	-	-	-		X
CA	-	-	-	-	-	-	-	-	-
CO	-	X	-	-	X	-	-	-	-
CT	X	-	-	-	X	-	X		X
DE	-	-	-	-	-	-	-	-	-
DC	X	X	-	-	-	X	-		-
FL	-	-	-	-	X	-	-		
GA	-	X	X	X	-	X	X		-
HI		-	-	-	-	-	-	-	-
ID	-	-	-	-	-	-	-	-	-
IL	-	-	-	-	-	-	-		-
IN	-	-	-	-	-	-	-		-
IA	-	-	-	-	-	-	-		-
KS	X	-	-	-	-	-	-		
KY	X	X	-	X	-	X	-	X	-
LA	X	X	X	-	-	-	-	-	X
ME	X	-	-	-	-	-	X		-
MD	-	-	-	-	-	-	-		
MA	-	-	-	-	-	-	-		-
MI	-	-	-	-	-	-	X		X

TABLE E-11
(Continued)

State	Review of documents for readability and/or content	Appointment/hiring of staff and/or election of officers	Review of SBO/SBAP outreach efforts	Review/comment on proposed/new regulations ^a	Definition of CAP responsibilities ^b	Attendance by CAP members at training sessions, etc.	Advisement about effective outreach activities ^c	Assessing small business concerns based on contacts	Other (See below)
MN	-	-	X	-	X				X
MS	-	-	X	-	-	X			X
MO	-	-	-	-	-	-			-
MT	-	X	X	X	-	X	-	X	-
NE	-	-	-	-	-	-	X		X
NV	-	X	-	-	-		-		-
NJ	-	-	-	-	-				
NH	-	-	-	-	-	-			
NM	X	X	X	-	X	-	-		-
NY	-	-	-	-	-		-		-
NC	X	-	-	-	-	-	X		X
ND	X	-	-	X	-	-	-		-
OH	-	-	-	-	-	-	-	-	-
OK	-	-	-	-	-	-	-	-	-
OR	-	X	-	X	X	X	-	-	X
PA	X	X	X	X	-		-		-
PR	-	-	-	-	-	-	-	-	-
RI	-	-	-	-	-	-	-		
SC	X	-	X	-	-		-	X	-
SD	X	-	-	-	-	-	-		-
TN	-	-	-	-	-		-		-
TX	X	X	-		X				

**TABLE E-11
(Continued)**

State	Review of documents for readability and/or content	Appointment/hiring of staff and/or election of officers	Review of SBO/SBAP outreach efforts	Review/comment on proposed/new regulations ^a	Definition of CAP responsibilities ^b	Attendance by CAP members at training sessions, etc.	Advisement about effective outreach activities ^c	Assessing small business concerns based on contacts	Other (See below)
UT	X	-	X	X	X	X	X		-
VT	-	-	-	-	-	-			-
VA	-	-	-	-	-		-		
VI	-	-	-	-	-	-	-		-
WA	X	X	X	-	-	X	-	X	X
WV	X	-	X	X	X	-		-	-
WI	X	-	-	X	-	X		X	X
WY	-	X	X	-	-		-	-	X
TOTAL	17	15	12	9	9	9	7	5	12

a Includes policies, guidelines, etc.

b Includes establishing internal procedures, defining meaningful roles for members, and developing means of measuring effectiveness

c Such as marketing and review of training programs, guidance document development, etc.

No activities reported: CA, MA, NJ, NY, VT

CAP has not met yet: AL, AK, AZ, DE, HI, IL, IA, MD, MO, NH, PR, RI, TN, OH, OK, VI

Other activities:

AR: Reviewing operational activities, voluntary compliance policies, and grant applications to provide improved small business services.

CT: Providing suggestions on leveraging resources through trade associations, vendors, suppliers, and small business trade publications.

LA: Interviewing small business persons that had been assisted by the program to determine effectiveness.
Referring small business to SBTCP for assistance.

MI: Advisement concerning implementation of SBTCP internal administrative procedures.

MN: Discussions on regulatory complexity and financing assistance issues.

MS: Working to ensure the independence of the SBO through direct access to the director of state environmental agency, thereby maintaining distance from regulatory arm of agency.

**TABLE E-11
(Continued)**

Developing plans to give SBO and staff more independence and expanding assistance to media other than air.
Attendance by Chairman at meetings of an air advisory fee panel made up of large industries to represent small business concerns.

- NE:** Permit reviews.
Providing feedback as to the effect of the SBAP on small businesses.
- NC:** Spreading information about SBTCP via speaking engagements at local civic and community organizations.
- OR:** Invited guest speakers to CAP meetings to discuss small business concerns.
Critiqued proposals affecting small business technical assistance activities and offered comments.
CAP Chair wrote a guest article for the Air Quality Division's newsletter.
- WA:** Participated in "Success Methods" survey in EPA region.
- WI:** Reviewed and commented on pollution prevention videos produced by WI DNR.
Had discussions concerning Small Business Development Center partnerships.
Commented on article published by Mr. Donald Croysdale criticizing CAA.
- WY:** Concentrated efforts on assuring that small businesses would not be penalized for seeking assistance.
Expressed intentions that SBTCP would be more effective with confidentiality and multimedia policies.

**TABLE E-12
MEETINGS AMONG SBO, SBAP, AND CAP**

FREQUENCY	SBO & SBAP	SBO & CAP	SBO, SBAP, & CAP	SBAP & CAP
Daily	9 programs AZ ^a , ME, MT, NE, NH ^a , NC, SC, TN, WA	-		
Weekly	3 programs FL, GA, WV			
Biweekly	4 programs IL, IN, MN, WI	-		
Monthly	5 programs DC ^b , NV, NJ, NY ^b , OH ^b	3 programs D.C. ^b , MT ^b , UT ^b	2 programs D.C. ^b , UT	2 programs D.C. ^b , MT ^b
Bimonthly	1 program CO	-		
Quarterly	4 programs CA, IA ^b , KS ^c , KY	10 programs GA, ME, MI, MS, NV ^d , NH ^d , PA, SC, WV, WI	17 programs AR, CO, CT, GA, KY, LA, ME, MI, MN, NH ^d , PA, SC, VA, WA, WV, WI, WY	7 programs GA, ME, MI, NH ^d , SC, WV, WI
Semiannually	-	1 program NC ^e	1 program NC ^e	1 program NC ^e
Biannually	1 program UT ^b	1 program NM	5 programs MT, NM, ND, SD ^d ,TX	1 program NM
Annually	-	1 program FL	1 program FL	1 program FL
Occasionally	15 programs AL, ID, LA, MD, MI, MS, NM, ND ^f , OK, OR, PA, RI, SD, VA ^g , WY	6 programs MN, NE, ND, OR, SD, VA ^d	1 programs OR	5 programs ND, OR ^h , SD, VA ^d , WY

a = SBO and SBAP have dual roles.

b = Also occasionally meetings.

c = Also informal daily meetings.

d = Planned frequency.

e = Minimum frequency.

f = At least 3 per month.

g = Almost daily.

h = Every 2 to 3 months

TABLE E-13
FINANCIAL ASSISTANCE PROGRAMS TO HELP SMALL BUSINESSES
COMPLY WITH CAA REQUIREMENTS

PROGRAM	DATE AVAILABLE	NAME OF GRANT/LOAN	FUNDING LEVEL
Arkansas	TBD	SBAP is planning to employ a part-time loan packager.	TBD
Connecticut	9 / 94	Financial Assistance for Vapor Recovery Systems (FAVRS) Loan Guarantee Program	\$5 million revolving loan fund for Stage II and P2
Illinois	Summer 1997	TBD	TBD
Indiana	NR	Capital Access Program, Indiana Development Finance Authority	Varies
	NR	Loan Guaranty Programs, Indiana Development Finance Authority	Up to \$2,000,000 for large projects.
	Currently available	Pollution Prevention Grants	\$200,000 the last two years. Usually in small increments up to \$25,000.
Iowa	Unknown	Property and sales tax exemptions	N/A
Maine	1 / 95	Green Fund	\$250,000
Minnesota	7 / 95	Small Business Environmental Loan Program	\$250,000 (pilot)
Montana	1 / 97	TBD	TBD
Nebraska	7 / 92	Sales tax rebate for installing environmental equipment	100% rebate
New York	TBD	TBD	TBD

**TABLE E-13
(Continued)**

PROGRAM	DATE AVAILABLE	NAME OF GRANT/LOAN	FUNDING LEVEL
Ohio	Currently available	Ohio Air Quality Development Authority bonds	Based on specific projects and what the market will bear
	Currently available	Small Business Assistance Fund	\$100,000 - 250,000 annually
	Currently available	Pollution Prevention Low Interest Loan Program	\$10,000,000 available for all media
	Spring 1996	Grant program	TBD
Pennsylvania	1 / 94	Air Quality Improvement Fund	\$3,000,000
Texas	TBD ^a	TBD	\$10,000,000
Utah	4 / 96	P2 Grant Program for Small Businesses	\$40,000 ^b
West Virginia	TBD	TBD	TBD
Wisconsin	12 / 94	WHEDA Clean Air Fund	\$1,000 - \$50,000
	12 / 94	WHEDA Ozone Protection Fund	\$1,000 - \$50,000

TBD To be determined.

a Draft legislation for 1/97 legislative session.

b \$20,000 EPA grant + \$20,000 match.

**TABLE E-14
LEVERAGING OF RESOURCES**

Descriptions of how each component of the SBTCP leverages existing personnel resources (within the state) are provided in Table E-14. (Comments edited for space.)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Alabama	Staff responds to environmental questions on all media, not just air. Funding comes from other programs (water, hazardous waste) as well as air.	Staffed with technical personnel in Air Program, who provide these services along with their other duties.	CAP has not yet met. The only funding is Air Division Chief's time and possibly a per diem allowance to cover members' travel expenses to meetings.
Alaska	SBO is manager of Compliance Assistance section of Statewide Public Service Division. P2 program and multi-media compliance assistance program are also included in this section. All programs work as a team to provide assistance to the public. Other division's program staff can be called upon for assistance or technical advice.	Same as SBO.	CAP has had only one meeting since it was established. The services of the Compliance Assistance section and other programs in the department are available as needed in support of the CAP.

**TABLE E-14
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Arizona	Agency Ombudsman assists with complaints from small businesses.	Agency Permitting Engineers and Compliance Inspectors frequently refer businesses to the SBAP and assist with workshops, training sessions, publications development, etc.	The Agency-appointed CAP member is the Deputy Director of the Agency.
Pinal Cty.	The District Director functions as SBO. The elected board of supervisors holds ultimate legal authority for air quality regulation by the County. They exercise that authority on an elective, rather than mandatory basis. Business operators in the County generally know elected Board members. Maintaining an awareness and appreciation for scope, nature, and sensibility of burdens imposed on small business constitutes a principal obligation of the District Director.	Pinal County has relatively stable inventory of sources. SBAP/SBO functions integrated directly into permitting and inspection process.	N/A
Maricopa Cty.	No response.	Maricopa County SBEAP works with state agencies, industry associations, chambers of commerce, community colleges, and small businesses to pool resources to provide high quality, low cost educational materials and workshops. This allows SBEAP to operate efficiently with limited staff resources.	No response.
Pima Cty. & Tucson	No response.	Program Manager for Information Services (public awareness, public education and business interface duties) manages the Business Assistance Program for Pima County DEQ. Reports directly to department director and has access to permitting and enforcement staff, files, and training.	No response.

TABLE E-14
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Arkansas	Operates through multi-media, 12 member Advocacy Council, a single member appointed from each operating division of the Agency by the Director. Individual council members provide advice and counsel on the operations of small business assistance program.	Sponsors Agency's P2 program. Currently has an entitlement from US EPA under contract with Technology Transfer Center, School of Engineering, University of Arkansas at Fayetteville. Uses multi-media inspection team from Agency to perform voluntary compliance audits. SBAP recipient of US EPA Leadership Grant Award.	No response.
California	Appointed by Governor, supported by Cabinet. Other state agencies involved.	Some local air districts have this function and some local SBAPs are largely independent. Many state departments assist.	Not yet appointed.
Colorado	SBO is an advocate for small businesses in the air regulatory arena. Contacts have been established with trade groups, chambers of commerce, and other associations to help get information, provide assistance and advocacy to small businesses in CO in complying with the Clean Air Act. SBO reviews all environmental rules being proposed and represents small business interests before regulating authorities. In addition, SBO works with SBAP to provide services as a means of getting the most out of our limited budgets.	SBAP provides technical assistance services. Contacts have been established with trade groups, chambers of commerce, and other associations to provide technical to small businesses in CO in complying with the Clean Air Act. SBAP has written simplified reporting forms for certain industries, created easy to understand fact sheets, and performed on-site visits to help calculate emissions. SBO and SBAP have developed a memorandum of understanding and a joint work-plan. SBAP works with SBO to develop materials, put on workshops, etc. as a means of getting the most out of limited budgets.	CAP members are all volunteers and they help SBAP and SBO provide the best services possible to citizens of CO. Role of the CAP is to review materials, provide guidance and oversight on what types of projects etc. that the SBAP/SBO focus on and provide contacts in industry to help get the word out.

TABLE E-14
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Connecticut	CT's SBO and SBAP are merged and collectively the program leverages technical staff from the Air Bureau to provide compliance assistance on air quality issues. The program uses staff from other Bureaus for multi-media assistance. The program can regularly access technical staff from the Air Bureau for permitting assistance, development of informational materials and fact sheets, and participation in seminars and workshops around the state. The program has been used to cross-train staff from other Divisions in the Bureau to enhance professional development while providing additional resources to the program. Additional resources are leveraged through partnerships with trade associations, other state agencies, quasi-public agencies, public utilities, local chambers of commerce, and non-profits.		CT's CAP has 10 members. Other interested individuals attend meetings regularly to provide a larger forum for small business interests. Opening the CAP to include non-voting members has broadened the expertise of the panel while providing additional resources to participate in the development of subcommittees.
Delaware	Ombudsman uses regulatory and engineering personnel to answer technical questions. No one has been assigned to assist the Ombudsman.	Ombudsman also serves as the SBAP.	Not established.
District of Columbia	None	None	D.C. appropriations funded agency representative's participation (\$5,000).
Florida	The Program has an EPA leadership grant. With this grant, we have contracted with the Small Business Development Centers to conduct site audits.	Same.	No response.
Georgia	SBO also is the program manager for the Permitting Program.	Used 2 Environmental Protection Division employees and 1 EPA-IPA employee.	N/A
Hawaii	No response.	No response.	No response.

**TABLE E-14
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Idaho	SBO has worked extensively with the Department of Commerce, Small Business Development Centers, Technical and Industrial Extension Service, and Division of Environmental Quality's Pollution Prevention Coordinator. For workshops, vendors, INEL representatives, local POTW managers, ID's universities, banking representatives, and DEQ regional office personnel have been utilized. SBO has worked closely with other Region X states (WA, OR, AK) to discuss common problems and recently entered into an agreement with the P2 Research Center to provide assistance with P2 issues under a leadership grant that is managed by Washington State.	SBAP works with all sections of 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.	No response.
Illinois	None	Leverage is 0.5 (administrative assistant) paid by state general revenue funds	None
Indiana	SBO works in cooperation with SBTAP.	SBTAP operates with full support of Office of Pollution Prevention and Technical Assistance.	Personnel from Legislative Services Agency (LSA) and SBTAP assist the CAP.
Iowa	SBO hires student interns as needed. The office makes extensive use of Chambers of Commerce and association personnel for information dissemination and gathering. The Citizens' Aide/Ombudsman, Deputy Ombudsman, and office staff contribute their time as necessary to facilitate the duties of the SBO.	The Iowa Air Emissions Assistance Program hires part- and full-time student assistants and interns from the University of Northern Iowa to help with client assistance during periods of heavy demand.	Not appointed
Kansas	SBO provides multimedia assistance, develops documents related to business concerns and assists the Director of Pollution Prevention as needed.	SBAP is contracted. There is some overlap and synergism between P2 staff and SBEAP staff. Uses technical expertise available through KSU College of Engineering and Engineering Extension.	CAP is an appointed advisory board. Members are not paid to serve.

TABLE E-14
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Kentucky	SBO meets with Division for Air Quality (DAQ) staff and is part of Cabinet efforts to improve permitting and customer service. DAQ has contact person to assist in training SBO and SBO for Jefferson County APCD. Jefferson County SBO has access to all resources of the District.	SBAP uses Small Business Development Center network, which includes 14 locations throughout KY to promote its availability. SBAP has obtained assistance from local business organizations & individual businesses in co-sponsoring seminars. Jefferson County APCD Program to provide technical assistance is under development	SBO serves as staff person to the CAP. A variety of environmental management staff & business people have spoken to the Panel without charging a fee.
Louisiana	Assignments made within the SBO staff, however additional personnel from the Governor's staff available as needed.	All assignments made within the SBAP staff. Uses services of the permit, water, solid and hazardous waste and legal sections.	Assignments made within the CAP members. SBO and SBAP staff are available for secretarial and other activities.
Maine	SBO works closely with SBAP and other business service providers, such as Department of Economic Development, to maximize effectiveness.	SBAP staff of one is able to use staff from Department's Pollution Prevention Program and from other bureaus.	Panel is joint panel comprised of 16 members. Functions of SBAP oversight were merged with an existing panel charged with oversight of Pollution Prevention Program.

**TABLE E-14
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Maryland	No added resources are leveraged for the SBO function.	The SBAP leverages extensive resources in and out of MDE. From Jan-June, 25% of two air permit engineers' time spent on small business air quality permits. From July-Dec, 50% of one air permit engineer's time spent on small business air quality permits. Designated SBAP contact in every media administration to coordinate regulatory and permitting assistance. All outreach projects conducted jointly with Pollution Prevention Program and received funding from that program. From July-Dec, three permitting engineers of MDE's Environmental Permits Service Center are designated resources for regulatory and permitting information. MDE's Office of Community Assistance coordinates logistics for all outreach activities. Department of Business and Employment Development's Small Business Development Centers and SBA's Small Business Resource Center partners with SBAP to host and advertise outreach seminars.	N/A

TABLE E-14
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Massachusetts	Ombudsman not appointed. SBAP manager receives SBO mailings and tries to function as SBO. Because of agency chain of command, access to Governor's office is not possible. Secretary of Environmental Affairs routinely meets with business leaders to solicit input on problems and programs.	<p>In addition to SBAP manager (0.75 FTE), chemical engineer (0.25 FTE) assists with SBAP functions and 1.00 FTE program assistant. Full access to 24 OTA technical staff. The agency has functioned since 1989 providing confidential, non-regulatory technical assistance to MA companies seeking to implement Toxic Use Reduction projects. These staff come at no expense to the SBAP program, but have real limitations on time, since companies that pay Toxic Use Reduction (TUR) fees (typically larger firms) actually pay for the operation of the agency.</p> <p>TUR Act allows for providing technical assistance to smaller quantity users of toxic materials, including compliance assistance, but there are limits. Currently operating within appropriate limits, but TURA program cannot adequately serve intended SBAP clients without dedicated funding.</p> <p>MA DEP provides some technical assistance for companies seeking permitting or compliance assistance through use of Customer Assistance staff in the state's 4 regions.</p>	No CAP Potential members recommended to Governor's office.
Michigan	100% restricted funds generated from state and county fee assessments.	100% restricted funds generated from state and county fee assessments.	Unfunded.
Minnesota		SBCAP contracted with MnTAP (Minnesota's P2 assistance organization, which operated at University of Michigan, funded of OEA) for joint outreach and educational assistance for NESHAPs. This was 0.3 FTE for FY95 and 0.4 FTE for FY96. MnTAP will provide another 0.6 FTE in FY96 for EPA Leadership Grant.	

**TABLE E-14
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Mississippi	No response.	No response.	No response.
Missouri	DNR's Technical Assistance Program assists with responding to requests for assistance from small businesses.	DNR's regulatory programs provide highly technical information if TAP cannot respond to the request itself. The regulatory programs are not given information to allow them to identify the facility in question.	CAP has not been appointed.
Montana	SBO is employed by the Department of Environmental Quality, but is located at the Department of Commerce's Small Business Development Center to take advantage of that program's business expertise and contacts.	SBAP is a partnership between the SBO's office and Department of Environmental Quality's Small Business Engineer.	CAP consists of five small business owners, one representative of the general public, and one representative of the Department of Environmental Quality. SBO serves as Secretary to the CAP and the Small Business Engineer provides technical information to the members.
Nebraska	Public Advocate/SBO funded by different areas within DEQ dependent upon the area in which the Public Advocate works.	SBAP assistance, on-site visits, workshops, flyers, phone calls, and materials funded through Title V funds from the Air Program.	CAP's expenses paid through Title V funds.
Nevada	SBO is NDEP employee whose full-time function is to act as the SBO for all media issues, not just air quality.	Assistant to the Administrator also is the Program Manager, which includes State Environmental Commission staff, of which he also is Executive Secretary.	6 of 7 members are appointed by Governor or legislative leaders. They are unpaid, but are given "per diem." Seventh member is NDEP's Air Quality Bureau Chief.
New Hampshire	Administrative assistance and support services provided by Air Resources Division.	Program utilizes existing pollution prevention program for P2 assistance. Regulatory personnel are utilized on an as needed basis for consultation.	Support/administrative services provided by Air Resources Division (regulatory agency charged with CAAA administration).
New Jersey	One person from NJ Department of Commerce and Economic Development.	Coordinates with Air Permit, Air Enforcement and Pollution Prevention staffs within NJ Department of Environmental Protection. Coordinates with NJ Institute of Technology TAP for P2 assistance.	N/A

TABLE E-14
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
New Mexico (except Bernalillo County)	Coordinating small business programs throughout the Department. Leading implementation of P2 initiatives.	Training of SBAP staff provided in part by permit/enforcement engineers. Other agencies, such as Economic Development and Small Business Development Centers, help SBAP with outreach. SBAP networks with other state and local programs to share information and documents.	Legal assistance provided by Assistant Attorney General.
Bernalillo County	N/A	Previous position for 1.00 FTE involved compliance, inspection, and registration/permit work. Further support given by Air Pollution Control staff and State of NM SBAP.	Legal assistance provided by Assistant Attorney General.
New York	All professional positions were new in 1993-94 before a statewide hiring freeze. Support staff reassigned.	Able to subcontract with technical assistance providers (County).	State regulatory agency designated as secretariat for CAP
North Carolina	NC Air Quality Section and Office of Waste Reduction have provided technical support. Developed information and workshops jointly with support by trade associations.	Same	Same
North Dakota	No personnel from other departments assigned to assist SBTCP. SBDC's and Governor's office asked to assist in providing small businesses with certain SBTCP information. Within the Department, SBO makes direct requests for assistance from Division Directors and their staff.	SBAP is organizationally inseparable from air pollution control program, whose SBAP staff work closely with the SBO on assistance matters. Although not formally recognized as part of the SBAP, other media programs (other than air) also work with SBO on assistance matters.	CAP relies on information from SBO and SBAP to provide important feedback to them. CAP receives information during CAP meetings with SBO and SBAP staff present in addition to receiving periodic informational mailings. Outside agency resources have not been leveraged by the CAP to date.

**TABLE E-14
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Ohio	Ombudsman program has been made part of an existing agency whose staff focuses on financing challenges of air quality mandates. Ohio Air Quality Development Authority chose to commit financial and personnel resources to the Ombudsman program before Title V permit fee revenue was available. This enabled the program to accomplish a significant amount of preparatory work prior to official appointment of the Ombudsman, which in Ohio, is a gubernatorial appointment. The Authority can provide benefits of its financing structures to Ombudsman program. It has used more than \$100,000 in research and special projects funds to support Ombudsman program.	SBAP is located in the same building as other Division of Air Pollution Control sections (i.e., permitting, field operations, new source review) allowing direct access to answer questions and receive policy interpretation. Program uses the five district offices and ten local air agencies to help publicize SBAP statewide through brochure distribution, etc.	Did not function in 1995. First meeting held in January 1996.
Oklahoma	Assistant Executive Director serves as SBO and is supported by SBAP staff.	We have 3.2 FTE as staff, who do the bulk of work as it relates to fulfilling SBAP mission.	Appointments have been made, but CAP has not officially met.
Oregon	SBO functions were reassigned to the director's office 11/95. As a member of upper management team, SBO has direct access to the director, department heads, and other regulatory agencies. SBO is presently developing agency-wide cross-media P2 program. As the single point coordinator of P2 within and outside agency, more efficient use of limited resources will be possible in the future. SBO also serves as liaison to CAP, SBAP, small business community, and general public on regulatory matters.	SBAP conducts joint technical assistance visits with other program staff. Small businesses and the public are provided free educational and technical assistance through the Pollution Prevention Outreach Team (a consortium of 7 Portland area regulatory agencies). Printed materials produced by Air Quality Division and other programs are modified to fit small business needs. SBAP distributes information to small businesses through their trade associations, equipment and chemical suppliers, and other service providers.	A CAP member represented Oregon at the White House Conference on Small Business. Many elements of the White House Conference were integrated into OR's Small Business Communication Plan. CAP and SBAP are collaborating with Small Business Development Center on a pilot education project. Special workshops are held as part of regularly scheduled CAP meetings to provide small business technical assistance outreach. Korean translations of the dry cleaning regulation have been made by a Korean-speaking member of the CAP.

**TABLE E-14
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Pennsylvania	SBO funded by Department of Environmental Protection and uses local service providers, which are funded by the Department of Commerce.	Department of Environmental Protection contracted many SBAP services to a private contractor. SBAP received cooperation from trade associations, utilities, and district libraries in delivering services.	Department of Environmental Protection provides administrative support to CAP CAP meetings held in the Department's building.
Puerto Rico	Those expenses identified as travel, transportation, reproduction, seminars are reimbursed by Title V.	Use our Planning Division technical staff in assisting small business.	Any expenses related with travel, transportation, reproduction, etc. are reimbursed by Title V.
Rhode Island	SBO (1 FTE) funded entirely from state revenues not associated with the CAA program. A second position will be funded from the CAA program.	SBAP integrated into Department's existing P2 program. 0.5 FTE currently providing limited services. (RI DEM is awaiting formal approval to hire 1 environmental planner and 1 air quality engineer to staff SBAP. In the interim, the Department's existing P2 staff respond to industry inquiries.	N/A
South Carolina		0.50 FTE dedicated by air staff to provide air dispersion modeling for qualified small businesses.	
South Dakota	SBO supervised by Secretary of the Department. SBO has direct contact with SBAP.	The individuals that work in the air program all contribute to the success of the SBAP.	CAP made up of individuals across South Dakota. Good mixture of private individuals and small business owners.
Tennessee	Funded by industry fees.	Funded by industry fees.	To be funded by industry fees.

TABLE E-14
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Texas	<p>Voluntary Consultant Program (10 active members). Five Small Business Advisory Committees (total 95 members). Small Business Development Centers (62 Centers).</p> <p>Train workers to educate business owners (5 sessions/181 trained). Work with suppliers and banks (30 banks).</p> <p>Work with TNRCC regional offices and municipalities to coordinate activities and information. Form partnerships with trade associations. This leads to increased attendance and increased numbers of workshops funded by associations.</p>	SBO & SBAP combined.	Diverse membership -- meet twice per year around the state.

TABLE E-14
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Utah	<p>SBO office has met with each Division and received some support for cross-referencing among division services and Utah's small businesses. One Division created brochure specifically to assist small businesses in becoming familiar with their services. Internal Division committee created to improve coordination and develop a small business policy (to be complete spring 96). One outcome of this committee was the regional award of the Small Business Leadership Grant "Partnership for Compliance," which increases the "team" approach through outreach, networking, and P2 activities.</p> <p>Voluntary Assistance Program (VAP) developed to provide small business on-site compliance support through coordinated effort with Division and Department's P2 Program. In coordination with Utah's P2 Program, EPA grant provided funding to establish this as a new position in SBO office. As requests increase for VAP on-site services, citizen volunteer program targeted for start-up in near future (three consultant volunteers have agreed to participate).</p>	<p>SBAP receives technical support from Department's P2 Program. SBAP also received grant funds from the P2 Program to support a P2 Small Business Grant Program.</p>	<p>Small Business Advisory Committee received support from existing division and department resources. For example, Department's consulting organizational facilitator has spent many hours working with the Committee to establish working priorities and action plans. Division's Executive Director's Office provided clerical support to prepare agendas, minutes, and workplans.</p>
Vermont	<p>Acting SBO employed by Air Pollution Control Division. Official title is "Air Quality Permit Assistant"; major duties include providing administrative support to Air Division Director and Permitting section.</p>	N/A	N/A

TABLE E-14
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Virginia	Utilizes the experience and expertise of SBAP Director, other DEQ staff, contacts within SBDC Network, and trade/business organizations maintain the pulse of the small business community vis-a-vis air regulatory impacts.	SBAP Director is also responsible for Air Division Air Toxics Program. Leveraging of 2 staff senior air toxic engineers for implementation of MACT provides the 0.3 FTE. Coordination and utilization of DEQ's P2, and Compliance & Enforcement Programs' resources also compliments SBAP activities. There are assigned SBAP Liaisons (permit engineers in each of DEQ's regional offices) that function on an ad hoc, as-needed basis for outreach, compliance assistance, etc. Coordination and utilization of resources (people & material) from trade associations, SBDC Network, and business groups provide a base of outreach support.	Compliance Advisory Board (CAB) is in the infancy of its activities. They have begun to review materials for understanding of the full program and the mechanisms to achieve the desired result of regulatory compliance for the small businesses of the Commonwealth. They have begun to review and edit a permitting guide.
Virgin Islands	Director of VI Small Business Development Agency has been appointed to serve in the SBO function without additional compensation. His support staff may be compensated.		
Washington	SBO is agency representative to Governor's Small Business Improvement Council composed of small business owners and various state agencies responsible for regulating state's businesses. SBO is agency representative to Unified Business Identifier (UBI) Board composed of state and federal regulatory agencies impacting primarily small businesses.	SBAP supports and is supported by the following relationships. Technical assistance staff for business-related pollution control/prevention exist in several other Ecology programs. Outreach and assistance staff in four of state's seven local air authorities. Moderate risk waste staff in states 39 counties.	One CAP member is legislative liaison for Air Quality Program. All other CAP members are unpaid volunteers (per diem, travel, lodging, and meals reimbursed). Staff support provided by SBAP

**TABLE E-14
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
West Virginia	SBO works closely with SBAP personnel to evaluate technical aspects of small business issues. DEP personnel outside air office are available for consultation.	SBAP works with other air quality staff, when necessary, to evaluate permit and Title V applicability for small business. Other DEP staff, especially P2 Services, are available to help coordinate assistance to small business. SBAP coordinating its efforts with other outside assistance groups, including University and Small Business Development Center efforts.	All members serve on a volunteer basis.
Wisconsin	Numerous experts (development finance, permit assistance, environmental compliance/safety) provide assistance, as needed, to SBO.	DNR personnel periodically provide technical review of publications for completeness and accuracy, help formulate outreach strategy, and suggest work plans.	Personnel from SBAP coordinate meeting locations, develop agenda topics and organize quarterly CAP meetings. Others from WI Department of Natural Resources, WI Department of Development, and University of Wisconsin Solid and Hazardous Waste Education advise and inform the CAP on an as-needed basis.
Wyoming	Since apart from SBO function, the designated SBO also has responsibilities working with each of the department's 7 divisions; coordinates activities affecting small businesses, especially outreach activities. SBTCP able to tap into networks and venues already developed by the established P2 programs in the Solid and Hazardous Waste Division and in the underground storage tank program. Although not under the auspices of the SBTCP, the SBO is positioned to ensure the department's other divisions and programs, where appropriate, are sensitive to the concerns of small businesses.	SBAP leverages limited resources through outreach to affected small businesses through trade associations and professional organizations such as: WY Trucking Association, WY Auto Dealer Association, WY Mining Association, WY Federation of Independent Businesses, and American Society of Safety Engineers. SBAP established information sharing relationships with other WESTAR SBAPs and uses their ideas and outreach material.	Department strategic plan calls for its other small business assistance programs to coordinate with the CAP and SBO where appropriate.

TABLE E-15
SBAP MECHANISMS FOR AVOIDING DUPLICATION AMONG SBTCPs

Program	Communication/ networking with SBTCP and state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBPA/SBO personnel within EPA region	Review of EPA documents/ Contact with EPA	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources *
AL	-	-	-	-	-	-
AK	X	X	-	X	-	-
AZ	X	-	-	-	-	-
AR	X	-	-	-	-	-
CA	-	-	-	-	-	-
CO	X	-	-	X	-	-
CT	X	-	-	X	-	X
DE	-	-	-	-	-	-
DC	X	-	-	-	-	-
FL	X	X	-	-	-	-
GA	X	X	-	-	-	X
HI	-	-	-	-	-	-
ID	-	X	-	-	X	-
IL	-	X	-	-	-	-

TABLE E-15
(Continued)

Program	Communication/ networking with SBTCP and state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBPA/SBO personnel within EPA region	Review of EPA documents/ Contact with EPA	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources *
IN	X	X	X	-	-	-
IA	X	-	-	-	-	-
KS	X	-	X	-	-	-
KY	X	-	-	-	X	X
LA	X	-	-	-		-
ME	X	-	X	-	-	-
MD	-	-	X	-		-
MA	-	-	-	-	-	X
MI	X	X	-	-	-	-
MN	X	X	-	-	-	-
MS	-	-	X	-	-	-
MO	X	X	-	-	-	-
MT	-	-	-	-	X	-
NE	X	X	-	-	X	-
NV	-	-	-	-	-	-

TABLE E-15
(Continued)

Program	Communication/ networking with SBTCP and state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBPA/SBO personnel within EPA region	Review of EPA documents/ Contact with EPA	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources *
NJ	X	-	X	X	-	-
NH	X	-	-	-	-	-
NM	X	-	X	-	-	-
NY	X	X	-	-	-	-
NC	X	X	-	-	-	-
ND	X	X	-	-	-	-
OH	X	-	X	-	-	-
OK	X	-	-	-	-	-
OR	-	-	-	-	-	-
PA	X	-	-	-	-	-
PR	-	-	-	-	-	-
RI	X	-	-	-	-	-
SC	X	-	-	-	-	-
SD	X	-	-	X	-	X
TN	X	-	-	-	-	-

TABLE E-15
(Continued)

Program	Communication/ networking with SBTCP and state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBPA/SBO personnel within EPA region	Review of EPA documents/ Contact with EPA	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources ^a
TX	X	X	-	-	-	X
UT	X	-	-	-	-	-
VT	-	-	-	-	-	-
VA	X	-	-	-	-	-
VI	-	-	-	-	-	-
WA	X	X	-	X	-	-
WV	X	-	-	-	-	-
WI	X	X	-	-	X	-
WY	-	X	-	X	X	-
TOTAL	37	17	8	7	6	6

a: Includes bulletin board services, web pages, and e-mail networks.

TABLE E-16
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	-	-	-	-	-	-	-
AK	-	X	-	-	-	-	-
AZ	-	-	-	-	-	-	-
AR	-	-	-	-	-	X	-
CA	-	-	-	-	-	-	-
CO	-	-	-	-	-	-	-
CT	-	-	-	X	X	-	-
DE	-	-	-	-	-	-	-
DC	-	-	-	-	-	-	X
FL	-	-	-	-	-	-	-
GA	-	-	X	X	-	-	-
HI	-	-	-	-	-	-	-
ID	-	-	-	-	-	-	-
IL	-	-	-	-	-	-	-

TABLE E-16
(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	-	-	-	-	-	-	-
IA	-	-	-	-	-	-	-
KS	X	-	-	-	-	-	-
KY	X	-	-	-	-	-	-
LA	-	X	X	-	-	-	-
ME	X	-	-	-	-	-	-
MD	-	-	-	-	-	-	-
MA	-	-	-	-	-	-	-
MI	-	-	-	-	-	-	X
MN	-	-	X	-	-	-	X
MS	-	-	-	-	-	-	-
MO	-	X	-	-	-	-	X
MT	-	-	-	-	-	-	-
NE	-	-	-	-	-	-	-
NV	-	-	-	-	-	-	-

TABLE E-16
(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)
NJ	-	-	-	-	-	-	-
NH	-	-	-	-	-	-	-
NM	-	X	-	-	X	-	X
NY	-	-	-	-	-	-	-
NC	-	-	X	X	X	-	-
ND	-	-	-	-	-	-	-
OH	-	-	-	-	-	-	-
OK	-	-	-	-	-	-	-
OR	-	-	-	X	-	-	X
PA	-	-	-	-	-	-	-
PR	-	-	-	-	-	-	-
RI	-	-	-	-	-	-	-
SC	X	-	-	-	-	-	-
SD	-	-	-	-	-	-	-
TN	-	-	-	-	-	-	-

**TABLE E-16
(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)
TX	-	-	-	-	-	X	-
UT	X	-	-	-	-	-	-
VT	-	-	-	-	-	-	-
VA	-	-	-	-	-	-	-
VI	-	-	-	-	-	-	-
WA	-	-	-	X	-	-	X
WV	-	-	X	-	X	-	X
WI	X	X	-	-	-	X	X
WY	X	-	-	-	-	-	-
TOTAL	7	5	5	5	4	3	9

Other Actions:

DC: Facilitation of penalty avoidance by arranging to allow dry cleaners to review facilities prior to compliance inspections.
Use of multi-media inspections, reducing forms from 3 to 1.

MI: Reduction and recycling of paper whenever possible.

MN: Working with rule writers to minimize complexity of modifications to regulations while still achieving NESHAP authorization.

TABLE E-16
(Continued)

MO:	Performing RACT analysis for several facilities to compare results with existing state regulations.
NM:	Reduction and recycling of paper whenever possible.
OR:	Exploring options to regulate and monitor compliance while reducing paperwork, including prohibitory rule, permit by rule, and general permits.
WA:	Assistance in design of permit applications and permit shells to minimize complexity and maximize understanding. One-on-one report/permit preparation guidance allowing small businesses to comply without having to read regulations.
WV:	Solicitation of input from industry on current regulations for use in developing future regulations.
WI:	Cooperation and sharing of information and written materials from other states, universities, and other organizations to prevent duplication of effort.

TABLE E-17
SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS
OF THE REGULATORY FLEXIBILITY ACT

Program	Simplified/ consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Routine review of SBTCP documents for compliance	Amnesty program	Review/comment on new air regulations to evaluate impacts	Other (See below)
AL	-	-	-	-	-	-	-
AK	-	-	-	-	-	-	-
AZ	-	-	-	-	-	-	-
AR	-	-	-	-	-	-	X
CA	-	-	-	-	-	-	-
CO	-	-	-	-	-	-	-
CT	-	-	X	-	-	X	X
DE	-	-	-	-	-	-	-
DC	-	-	-	-	-	-	X
FL	-	-	-	-	-	-	-
GA	X	X	-	-	-	-	X
HI	-	-	-	-	-	-	-
ID	-	-	-	-	-	-	-
IL	-	-	-	-	-	-	-

TABLE E-17
(Continued)

Program	Simplified/ consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Routine review of SBTCP documents for compliance	Amnesty program	Review/comment on new air regulations to evaluate impacts	Other (See below)
IN	-	-	-	-	-	-	-
IA	-	-	-	-	-	-	-
KS	-	-	-	X	-	-	-
KY	-	-	-	-	-	-	-
LA	X	-	-	-	-	-	-
ME	-	-	-	X	-	-	-
MD	-	-	-	-	-	-	-
MA	-	-	-	-	-	-	-
MI	-	-	-	-	-	-	-
MN	X	-	-	-	X	-	-
MS	-	-	-	-	-	-	-
MO	-	-	-	-	-	-	-
MT	-	X	-	-	-	-	-
NE	-	-	-	-	-	-	-
NV	-	-	-	-	-	-	-

TABLE E-17
(Continued)

Program	Simplified/ consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Routine review of SBTCP documents for compliance	Amnesty program	Review/comment on new air regulations to evaluate impacts	Other (See below)
NJ	-	-	-	-	-	-	-
NH	-	-	-	-	-	-	-
NM	-	-	X	-	-	-	-
NY	-	-	-	-	-	-	-
NC	X	X	X	-	-	-	-
ND	-	-	-	-	-	-	-
OH	-	-	-	-	-	-	-
OK	-	-	-	-	-	-	-
OR	-	-	-	-	-	-	X
PA	-	-	-	-	-	-	-
PR	-	-	-	-	-	-	-
RI	-	-	-	-	-	-	-
SC	-	-	-	X	-	-	-
SD	-	-	-	-	-	-	-
TN	-	-	-	-	-	-	-

**TABLE E-17
(Continued)**

Program	Simplified/ consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Routine review of SBTCP documents for compliance	Amnesty program	Review/comment on new air regulations to evaluate impacts	Other (See below)
TX	-	X	-	-	X	X	X
UT	-	-	-	-	X	-	-
VT	-	-	-	-	-	-	-
VA	-	-	-	-	-	-	-
VI	-	-	-	-	-	-	-
WA	-	X	-	-	-	-	-
WV	X	-	X	X	-	X	X
WI	-	-	-	-	-	-	X
WY	-	-	-	-	-	-	-
TOTAL	5	5	4	4	3	3	8

Other Actions:

AR: Publication of regulatory documents that are more user-friendly.

CT: Developed and provided information on financial assistance programs to help with capital expenses involved in compliance with CAAAs.

DC: Facilitation of penalty avoidance by arranging to allow dry cleaners to review facilities prior to compliance inspections.

GA: Bringing proposed legislation to CAP for review.

TABLE E-17
(Continued)

OR:	<p>Allowing use of "potential to emit" to apply for Title V permits for small businesses with actual emissions less than 50% of major source thresholds.</p> <p>Deferring non-major PCE dry cleaning, chrome electroplating and anodizing, ethylene sterilizing, and users of halogenated solvents for 5 years, in accordance with EPA policy. If approved by EPA, chrome electroplaters and anodizers will be permanently exempted from acquiring Title V permits.</p>
TX:	<p>Development of working groups to ensure that rules do not create unnecessary burdens for small business.</p> <p>Assisting in the streamlining of rules.</p>
WV:	<p>Solicitation of input from industry on current regulations for use in developing future regulations.</p>
WI:	<p>Bringing proposed legislation to CAP for review.</p> <p>Ensuring that CAP comments on proposed legislation are presented to appropriate legislators or regulatory agency officials.</p> <p>Providing direct assistance to small businesses, such as help with calculations, clarification of rules and standards, and sponsorship of industry-specific seminars.</p> <p>Working closely with trade organizations to develop outreach materials and obtain feedback on regulations affecting industries they represent.</p> <p>Developed a regulatory flexibility notification network to notify industries about legislation that may affect them, and where possible, giving them the opportunity to comment.</p>

TABLE E-18
SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS
OF THE EQUAL ACCESS TO JUSTICE ACT

Program	Routine review of SBTCP documents for compliance	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Other (See below)
AL	-	-	-	-
AK	-	-	-	-
AZ	-	-	-	-
AR	-	-	-	X
CA	-	-	-	-
CO	-	-	-	-
CT	-	-	X	X
DE	-	-	-	-
DC	-	-	-	-
FL	-	-	-	-
GA	-	X	-	-
HI	-	-	-	-
ID	-	-	-	-
IL	-	-	-	-
IN	-	-	-	-
IA	-	-	-	-

TABLE E-18
(Continued)

Program	Routine review of SBTCP documents for compliance	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Other (See below)
KS	X	-	-	-
KY	-	-	-	-
LA	-	-	-	X
ME	X	-	-	-
MD	-	-	-	-
MA	-	-	-	-
MI	-	-	-	-
MN	-	-	-	-
MS	-	-	-	-
MO	-	-	-	X
MT	-	-	-	-
NE	-	-	-	-
NV	-	-	-	-
NJ	-	-	-	-
NH	-	-	-	-
NM	-	-	X	-
NY	-	-	-	-

TABLE E-18
(Continued)

Program	Routine review of SBTCP documents for compliance	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Other (See below)
NC	-	X	X	X
ND	-	-	-	-
OH	-	-	-	-
OK	-	-	-	-
OR	-	-	-	-
PA	-	-	-	-
PR	-	-	-	-
RI	-	-	-	-
SC	X	-	-	-
SD	-	-	-	-
TN	-	-	-	-
TX	-	-	-	X
UT	-	-	-	-
VT	-	-	-	-
VA	-	-	-	-
VI	-	-	-	-
WA	-	X	-	-

TABLE E-18
(Continued)

Program	Routine review of SBTCP documents for compliance	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Other (See below)
WV	-	-	-	-
WI	-	-	-	-
WY	X	-	-	-
TOTAL	4	3	3	6

Other Actions:

- AR: Funds made available for engineering services for citizen groups aggrieved by permit actions of regulatory agency.
- CT: Developed and provided information on financial assistance programs to help with capital expenses.
- LA: Proposed and had accepted low permit fees for small businesses.
- MO: Targeting small businesses that may lack capital or human resources to comply with CAAAs.
- NC: Minimization of recordkeeping and reporting requirements by developing cutoffs for types of operations included in an exclusionary rule that defines potential emissions as actual or by allowing small facilities to use more realistic emissions calculations.
- TX: ADR services.
Pro bono legal services established.

APPENDIX F

PROGRAM EFFECTIVENESS

TABLE F-1
COMMENTS RECEIVED BY THE SBO OR THE CAP ON THE SBTCP
(Comments edited for space.)

Program	Comment Received
Alabama	Hotline callers expressed appreciation for services offered, registered complaints about pollution sources, and complained about the hotline not being answered 24 hours a day.
Alaska	Regularly receives positive comments on the type of information provided, the timeliness of the information, and the services provided.
Arizona	Those who have received assistance found it to be a valuable resource.
Arkansas	Comments concerning Department of Pollution Control and on workshops about regulatory issues: "The commitment to spend more time assisting, instead of fining, is very encouraging." "They try to help - good." "Should have had this four years ago. The need to start a statewide liability fund for dry cleaners is very important." "We need all the plain English materials we can get." "We appreciate your efforts to help us and our industry."
California	Mostly favorable comments in helping the public successfully and working with the permitting process.
Colorado	All comments received by the CAP and SBO were favorable. We received thanks for creating simple-to-use application materials, for putting on workshops, for sharing knowledge we gained from industry with our permit review and performance staff, which led to more workable permit conditions, and thanks from individual business owners for help with forms and determining their permit report and reporting requirements.
Connecticut	Businesses have commented that services provided were extremely helpful. Financial Assistance for Vapor Recovery Systems (FAVRS) has been recognized by EPA as a national model for compliance assistance efforts and received favorable local press coverage.
Delaware	Receive excellent support and backing of State Chamber of Congress.

TABLE F-1
(Continued)

Program	Comment Received
District of Columbia	SBO: Outreach done by one individual, visiting facilities on his own time. SBAP: Information systems will be on-line. CAP: Great organizational skills.
Florida	The Ombudsman has received numerous positive comments from the regulated community and others regarding the operations of the SBAP.
Georgia	"Your office is very helpful." "The small business staff is very responsive!" "The help provided by your office is greatly appreciated."
Hawaii	No comments provided.
Idaho	A survey was given for all workshops. The general consensus was that the workshops were helpful and that we should do more of them. All comments received have been favorable to the program, asking us to do more in the future.
Illinois	Business association members have expressed that DCCA staff are responding to their needs in a timely and professional manner. Individual companies contacted were pleased that a nonregulatory, small business assistance agency was available for help and information on environmental compliance issues.
Indiana	Received several positive comments regarding the services being offered, most notably in the areas of phone assistance and outreach.
Iowa	IAEAP tracks client evaluations on a standardized form. Based on 85 respondents, 95% rate service as excellent, 2% as good. Of the same respondents, 91% rated the service as very helpful and 9% as somewhat helpful. Verbal accounts received at SBO outreach meetings have indicated that citizens are pleased that such a resource is available for their use at no cost. Businesses served by IAEAP have been exceptionally pleased with the assistance they have received.
Kansas	Many callers have expressed appreciation for prompt service. Several callers have suggested newsletter article ideas, asked questions related to the newsletter, and given compliments on information supplied.

**TABLE F-1
(Continued)**

Program	Comment Received
Kentucky	State trade association directors and state Chamber of Commerce members indicated that the SBTCP was needed to assist small businesses with the CAAA due to the complexity of the regulations and the limited resources of the permittees. Same group expressed the need for similar programs dealing with soil and water regulatory issues.
Louisiana	"The SBAP has been very helpful when assistance has been requested." "I cannot tell you how much I appreciate all the work you've done for us over the past seven months. Clearly, without your input I would have been unable to fulfill the requirements for compliance with the Air Quality Standards." "Increased awareness of small businesses of the activities of the SBAP and SBO would be helpful.
Maine	Overall very positive responses to the program by the small business community.
Maryland	No comments provided.
Massachusetts	No comments provided.
Michigan	The CAP indirectly received an appraisal letter regarding outreach training initiated by the SBAP
Minnesota	The results of a survey sent to 267 randomly-selected SBAP clients indicated that 72% rated assistance as "very helpful," 25% rated it as "somewhat helpful," and 3% as "not that helpful." In addition, 95% of respondents would recommend the SBAP to other businesses. Numerous positive comments about the assistance provided, including comments such as "[The SBAP] made me feel like a partner rather than an adversary in the pollution control business.'
Mississippi	"On behalf of the dry cleaning industry, I'd like to say thank you for your efforts to help us comply." "I wanted to thank you and your staff for a truly great program. The staff is very knowledgeable and also very open to suggestion." "This program creates a cost effective way for us to comply with EPA Regulations. We appreciate the assistance and will inform others about this great program."
Missouri	No comments provided.
Montana	The SBO and the Small Business Engineer received personal thanks from the owner of a polystyrene insulation manufacturing plant for the service they provided during the permitting process.

TABLE F-1
(Continued)

Program	Comment Received
Nebraska	<p>"A breath of fresh air, we now have someone at the regulatory agency that will answer questions that concern us, without talking to an inspector."</p> <p>"You have done more in two hours to help me than the last two years of going to meetings put on by others." Douglas Manufacturing, Crete, NE.</p> <p>"Before your office was established, we just could not seem to get the answers we needed. JBL Sound Systems, Kearney, NE.</p> <p>"It is a good working relationship between your agency and ours when a new business wants to come to Nebraska. The SBAP is a positive step." Paraphrased from John Conners, NE Dept. of Economic Development.</p>
Nevada	No comments provided.
New Hampshire	<p>Appreciative to have someone to discuss regulations without fear of enforcement.</p> <p>Glad that someone could help identify which regulations are and are not applicable.</p> <p>Appreciated having a resource to help guide them through the regulatory process.</p> <p>Assistance in interpretation of regulations beneficial.</p>
New Jersey	Dry cleaner industry has commented positively on the materials developed for them.
New Mexico	The SBO has received positive feedback that the program is going in the right direction.
New York	<p>Numerous positive news articles in trade journals.</p> <p>Numerous positive correspondence from clients, including comments such as "[SBAP] staff are generally perceived to be very well informed, helpful, responsive, professional, etc."</p> <p>"We certainly would have been floundering without your invaluable assistance."</p> <p>"Thank you for your help in walking us through the Permit to Construct process. You helped make the process easier than I expected it to be...Your organization is a tremendous asset to a small business like ours."</p>
North Carolina	<p>"Your office is a glowing example of a government body that provides help and considerable expertise to small business that is needed." (wood products manufacturer)</p> <p>"I've been in business for 41 years and this is the first time someone from the government has explained how these environmental rules affect my business." (owner of a small metal finishing shop)</p>
North Dakota	No comments provided.

**TABLE F-1
(Continued)**

Program	Comment Received
Ohio	<p>Most frequent comments express relief that the state was providing technical assistance on complex CAA requirements. Initial concerns about confidentiality were somewhat alleviated by protections in Ohio law. There was a positive response to the concept of targeting special assistance to small business. Requested site visits have been well received.</p> <p>Financial assistance is cited as a necessary component of this program. Many small businesses face the double challenge of needing financing in an amount considered small by many capital sources and associated with the perception of high risk because it is an "environmental" loan.</p>
Oklahoma	<p>Without exception, the comments received by agency management have been extremely positive toward the work that the SBAP is doing, as well as the entire Customer Assistance Program (within which the SBAP is housed). Particularly, the regulated community is most impressed with the access to information, the willingness to take an "assistance first, enforcement second" approach, and our dedication to representing the needs of the small business community.</p>
Oregon	<p>In general, there is greater acceptance of the Small Business Assistance Program. Several individuals attending the November 15, 1995 chrome electroplating and anodizing teleconference mentioned it was very worthwhile. A Decorative electroplating business mentioned that the fume suppressants placed into its tanks resulted in noticeable reduction in workplace odors. Several inquiries were received about filling out and submitting notification forms. Two dry cleaning and one lighting fixture company, with assistance from SBAP, were brought into air compliance and are requesting assistance in applying for pollution prevention tax credits. A small painting company treating aluminum electronic parts in a chrome conversion tank thanked the SBAP for its assistance in meeting fire marshall requirements.</p>
Pennsylvania	<p>The few comments received are usually positive.</p>
Puerto Rico	<p>No comments provided.</p>
Rhode Island	<p>SBO has received positive comments on the SBTCP from assisted businesses and from the State's Economic Development Corporation (EDC), which has been working with SBO to assist companies that CAA-related compliance issues.</p>

TABLE F-1
(Continued)

Program	Comment Received
South Carolina	We have received numerous comments on how this type of technical assistance has made the difference in being able to get permits and come into compliance. Statements have been made to the effect that if it were not for our assistance, they would not have come forward due to the cost of private consultants.
South Dakota	Contacts with SBO have been generally positive. Contacts to SBO regarding assistance from Small Business Assistance Program have been very favorable.
Tennessee	The Tennessee Air Pollution Control Board, which has the authority to establish the program's funding level, has been complimentary of program efforts. A regional business publication included a four column article on the program. Program workshops received press coverage in the business section of a major newspaper. Four out-of-state program and a foreign country representatives attended program workshops. One business owner commented after a Clean Air Act review workshop that the statement "I'm from the government and I'm here to help" is really true. Workshop evaluations indicated the participants found the workshop to be good to excellent. The Tennessee Association of Business complimented activities conducted by the program.
Texas	"We would like to take the this opportunity to commend Tamra-Shae Oatman and Adam Haynes, Small Business Advocates Office, for their assistance and advice in establishing the SAMA Small Business Environmental Advisory Committee." Excellent work that has been done by the TNRCC Small Business Advocate Office during the past two years. Keep providing up-to-date, easy to understand information for small business owners. Better interpretation of Clean Air Act (CAA).
Utah	Feedback consistently indicates that the information is accurate, accessible, timely, and supportive. However, there continues to be a lack of program recognition, despite many outreach efforts.
Vermont	No comments provided.
Virginia	No comments provided.
Virgin Islands	No comments provided.

**TABLE F-1
(Continued)**

Program	Comment Received
Washington	SBO: General program activities too "young" to provide meaningful comments.
West Virginia	<p>The WV Cleaners and Launderers Association has commented that the SBAP was very helpful in meeting federal MACT requirements.</p> <p>The Chrome Electroplating Workshop evaluations resulted in ratings of 8.6 for the workshop and 9.1 for SBAP presenter (out of 10).</p> <p>The SBAP and SBO have received several verbal comments that praise their assistance efforts.</p> <p>No negative comments have been received to date.</p>
Wisconsin	<p>Numerous small business representatives have commented that they appreciate the ability of the program to provide clear and understandable guidance regarding environmental regulations. They also appreciated the prompt service and turn around time on information they received.</p> <p>"This type of cooperation with business in helping reduce paperwork burden is real evidence of Wisconsin government's commitment to improve the business climate in our state."</p>
Wyoming	During a CAP meeting, a representative of the National Federation of Independent Small Businesses (NFISB) commented on the effectiveness of the SBTCP and that the agency will not seek penalties when businesses work in good faith to come into compliance.

TABLE F-2
NATURE OF COMPLAINTS RECEIVED/INITIATED BY THE SBO OR THE CAP
AND INFORMATION OF THEIR RESOLUTION
(Responses edited for space.)

Program	Complaint/Comment	Resolution
Alabama	Hotline not answered 24 hours a day.	No resolution.
Alaska	No complaints/comments provided.	
Arizona	Permitting staff not responsive to applicant needs.	Re-established lines of communication between applicants and Permit Engineers.
	Permit application approval takes too long.	Helped develop general permits to shorten approval times.
Arkansas	No response.	Complaints are generally routed to our Public Information Agency or received by the Director and assigned to a Division for resolution.
California	Forms need to be simplified. Not knowing how to proceed.	Streamline and speed up the process. Helped work through the form, made connections with appropriate people.
Colorado	No complaints/comments provided.	
Connecticut	One CAP member commented that the SBO needs to return phone calls in a more timely manner.	Phone calls will be returned within 24 hours of receipt. Efforts underway to increase staff resources.
	Seminar/workshop attendees complained that announcements did not give enough advance notice.	Seminar/workshop announcements will be mailed at least 3 weeks in advance of the event.
Delaware	Permit applications required too much time to complete and unnecessary paperwork was sent.	Regulatory personnel worked with business over the phone to resolve confusion. They admitted that unnecessary and confusing paperwork was sent.
District of Columbia	No complaints/comments provided.	
Florida	No complaints/comments provided.	
Georgia	Complaint regarding regulatory inflexibility and economic hardship imposed by Georgia Air Quality Rules.	Worked with company involved and recommended the revision of an Air rule that eliminated obstacles to production and growth.

**TABLE F-2
(Continued)**

Program	Complaint/Comment	Resolution
Hawaii	No complaints/comments provided.	
Idaho	No complaints/comments provided.	
Illinois	The toll-free helpline used in early 1995 was automated, and it took three button pushes to reach the SBAP staff.	In July, 1995, a new toll-free helpline was installed that rings directly on SBAP staff desks.
Indiana	No complaints/comments provided.	
Iowa	Air quality permit denied.	Clarified situation with complainant and IDNR.
	Air quality regulations as they pertain to open burning and community inaction toward institution of a burning ban.	Referred complainant to IDNR for rule specifics.
	Air quality regulations as they apply to concrete dust generated in road projects.	Directed to Clean Air Act Amendments regulations regarding fugitive dust emissions.
	Auto body shop compliance problem with IDNR referred to SBO by IAEAP.	Rectified by IDNR and auto body shop the day SBO was notified of the problem.
	Financial assistance/availability complaints and questions.	Investigated funding options. Met with Small Business Administration to encourage promotion of their Pollution Control Loan. Introduced legislation to allow pollution control equipment purchased by service businesses to be included in current property and sales tax exemption law.
	Complaints regarding complexity of construction permits and operating permits.	Currently serving on a task force reviewing and revising the construction permits.
	Two cases involving dry cleaners and asbestos regulations.	Not yet resolved.

TABLE F-2
(Continued)

Program	Complaint/Comment	Resolution
Kansas	General miscommunications or misunderstandings between regulators and businesses.	Investigated the complaints and clarified the miscommunications.
	Complaints about pending legislation.	Businesses were informed of procedures to contact their legislators. Articles and a brochure were written about the legislative process, how to present testimony, and how to effectively contact a legislator.
	In several instances, businesses complained about staff (i.e. personnel instances).	Each complaint was handled differently based on needs. In general, supervisors were consulted.
	Compliance schedules were questioned.	When possible, additional time was provided.
Kentucky	Professional engineers expressed concern that SBAP would ultimately cut into market for their services.	SBO met with Executive Director of Kentucky Society of Professional Engineers and spoke to the Kentucky Council of Consulting Engineers to give them accurate information about the program.
Louisiana	No complaints/comments provided.	
Maine	Fear of enforcement.	Formulated a policy.
	Companies do not know about the program.	Development of outreach effort for 1996.
Maryland	No complaints/comments provided.	
Massachusetts	No complaints/comments provided.	
Missouri	No complaints/comments provided.	
Michigan	Applicability of New Source Review. Applicability of Title V. Status of application for Permit to install. Difficulties with local regulatory agency district office. Mercury Pollution Task Force. VOC exemptions. Applicability of NESHAP. Outdoor burning bans. Enforcement intercession. Pollution control tax exemption certificates. Attainment vs. non-attainment areas.	All complaints were resolved satisfactorily.

TABLE F-2
(Continued)

Program	Complaint/Comment	Resolution
Minnesota	Compliance initiative for sand and gravel industry thought to be unfair by industry.	Worked with AQ staff and trade association to ease some provisions, especially penalty matrix for very small operators.
	Dry cleaner became involved in a Superfund site with multiple owners. Complaint concerned how the business was "treated."	Worked with owner and MPCA site response staff to help them understand that a very small business operates differently than a large business. Sought more understanding of their situation and "simple English" stating of the facts and options.
Mississippi	A chemical distributor expressed concern, echoed by DEQ Air Toxics Section, that dry cleaners needed hands-on assistance with the MACT standard.	Three workshops were organized and presented in three different areas of the state
Montana	No complaints/comments provided.	
Nebraska	Forms are too complicated.	Worked through the form, either by phone or in person.
	Don't understand what is needed.	On-site visits to discuss requirements.
	"Your agency is picking on me because I cannot afford to fight you."	Expressed understanding and explained requirements to report. Offered to help him through the process.
Nevada	No complaints/comments provided.	
New Hampshire	Permit application fees are too high/not equitable.	Permit fees eliminated and emissions-based fees instituted.
	Recordkeeping/reporting requirements burdensome.	Allow for prediction/purchase records to be used for compliance assistance.
	Regulations seen as costly.	Developed specific analysis showing compliance reducing costs and increasing profits and quality through reductions in material usage and waste.
New Jersey	No complaints/comments provided.	
New Mexico	No complaints/comments provided.	

**TABLE F-2
(Continued)**

Program	Complaint/Comment	Resolution
New York	Businesses don't have access to funds for environmental compliance equipment and services.	Working with banks to initiate a financing program.
	The state regulatory agency takes too long processing permit applications at the expense of business operations.	Works with regional offices to expedite paperwork.
	Many small businesses didn't know about regulations and are in non-compliance. They are afraid to come forward voluntarily because of penalties.	Worked with the state regulatory agency to establish a small business amnesty program.
	The paperwork associated with complying with state regulations is too cumbersome.	Worked with regulatory agency to streamline paperwork such as implementing a registration program.
North Carolina	Conflicting information from consultants and regulators.	Briefed clients on regulatory requirements and met all interested parties to clarify issues.
	Cost of permit, especially with PE seal requirement.	Encouraged the use of general permits which preclude the need for a PE and cost half the normal permit fee.
	Permit requirements are too complex.	Developing a permit guide to accompany simplified permit application.
	The cost of complying is too high.	Expanded the list of insignificant activities and exemptions for smaller businesses in the rules.
North Dakota	No complaints/comments provided.	
Ohio	Most "complaints" have centered on lack of understanding of air regulations and requirements, most specifically determining emissions.	Businesses have been referred to the SBAP at OEPA for in depth assistance; response has been favorable.
Oklahoma	No complaints/comments provided.	
Oregon	No complaints/comments provided.	
Pennsylvania	No complaints/comments provided.	
Puerto Rico	No complaints/comments provided.	
Rhode Island	Difficulty in meeting emissions caps and other limits.	A process has been established to resolve complaints through technical assistance, SBO, and regulatory staff.

**TABLE F-2
(Continued)**

Program	Complaint/Comment	Resolution
South Carolina	No complaints/comments provided.	
South Dakota	Don't know who to talk to about a particular issue or concern.	Directed party to appropriate DENR person, usually in the Small Business Assistance Program.
	Don't have proper information on a subject.	Provided information and directed party to Small Business Assistance Program or other DENR staff for additional information.
	Don't know what permits are required for my business.	Provided party with DENR permitting guide and direct them to appropriate DENR staff.
Tennessee	No complaints/comments provided.	
Texas	Small businesses find recordkeeping and reporting time-consuming and redundant.	The SBAP is working with other divisions in the agency to consolidate reporting requirements.
	Environmental laws are not clearly communicated to small businesses.	The SBAP initiated a plain language program to insure that all materials sent to small businesses are easy to read and understand.
	Small businesses find it difficult to acquire funds to purchase compliance equipment.	The SBAP has initiated a financial assistance program to assist small businesses in finding funding to purchase needed equipment.

**TABLE F-2
(Continued)**

Program	Complaint/Comment	Resolution
Utah	Many businesses expressed concern that the length of the Amnesty Program was too short of an opportunity for businesses to become aware of the program in order to participate.	Small Business Advisory Committee (SBAC) unanimously requested extension of the program to allow greater participation. The Director concurred and extended the program until January 30, 1996.
	Some businesses did not qualify for the Amnesty Program due to the structured criteria.	Formal "Amnesty Exception" review process established under Director's authority to review individual company situations and to make final determination. In nearly every case, "Amnesty Exceptions" were granted. Where companies clearly did not qualify, an individual compliance support process was put into effect.
	Divisions were unfamiliar with services provided within the Department, and that often their limited coordination created a delay in small businesses receiving timely and accurate information.	Individual meetings held with each Division to increase coordination and to create cross-referencing and multi-media opportunities. One division produced and distributed a small business brochure as a result of this effort.
	There did not appear to be consistent division-wide understanding of existing small business services and that an increased level of coordination was needed.	An internal Division Small Business Coordinating Committee was established to help develop a unified small business operating policy.
	A complaint was registered against a municipal permitting office regarding inaccurate information on obtaining Approval Orders in time for construction of a paint booth, which created construction delays. The owner was also given an inaccurate phone number for the SBO office.	Referrals were made to appropriate contacts and to SBAP. Additionally, Amnesty and SBAP brochures were supplied to municipalities and will be updated and distributed statewide in the near future.
	Several complaints involved venting frustrations on various issues.	Individuals are invited to meet face-to-face to discuss their concerns and to receive immediate responses. Four such meetings were held with positive results.

**TABLE F-2
(Continued)**

Program	Complaint/Comment	Resolution
	A complaint was made against a consulting company for overcharging, delaying responses, and providing haphazard submittals.	Issue still pending. Several means of informing businesses about their consultants' progress are being considered. To date, discussions include reducing the company's permit fee by billing significant portions under training when the Division is "educating" the consultant, holding training workshops for consultants, and providing copies of all correspondence with consultants to the hiring company. Currently, draft legislation is in motion to establish a certification program for consultants.
Vermont	No complaints/comments provided.	
Virginia	Do not understand the regulations.	Assisted with understanding.
	Regulatory development is very complicated and we are never involved.	Provided opportunity for participation in the regulatory development process.
Virgin Islands	No complaints/comments provided.	
Washington	SBO: Expressions of general concerns, usually procedural in nature.	Concerns referred to local air authorities BAP or appropriate Ecology regional office for resolution. SBO provided follow-up to ensure resolution.
West Virginia	The SBO has intervened in several enforcement actions involving small businesses. In these cases, the SBO felt that the agency had not adequately considered the needs and financial resources of the alleged violator in assessing penalties and permit fees.	
Wisconsin	Article by Donald Croysdale criticizing the Clean Air Act.	Response letter written by CAP member addressing concerns.
	Critique of publication quality (non-content).	Purchased updated desk-top publishing software and a scanner to improve publications.
Wyoming	Very few, primarily involving reports of possible violations.	Discussed issue with CAP which advised that small businesses may be cutting costs by violating regulations and competitors may call in such complaints.

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

Program	Accomplishments
Alabama	No comments.
Alaska	No comments.
Arizona	No comments.
Pinal Cty.	No comments.
Maricopa Cty.	<p>In its first year, Maricopa County SBEAP made great strides in developing partnerships with industry organizations, local and state government agencies, chamber of commerce, small business organizations, and local businesses. By working with the Home Builders Association, Printing Industries Association of AZ, American Electroplaters & Surface Finishers, AZ Association of Industries, AZ Small business Association, AZ Small Business Connection, and Maricopa County Community Colleges, a large number of businesses have been reached and provided with a new resource. By working closely with regulatory agencies, SBEAP has taken away some of the fear of the unknown that many companies have regarding rules and possible fines for non-compliance.</p> <p>SBEAP's first annual Small Business Environmental Awareness Conference, "Navigating the Air Quality Maze," was a tremendous success. The event was attended by over 100 people and included speakers from local, state, and federal environmental agencies, environmental attorneys, P2 specialists and industry professionals. The next conference will be in October 1996 and will include topics suggested by businesses.</p> <p>In May 1995, Maricopa County Environmental Services Department, SBEAP, and AZ Association of Industries (AAI) initiated a cooperative effort in response to the business community to improve the air permitting process in the County. An Air Permitting Improvement Committee was developed to determine how to make the process more streamlined, consistent, predictable, and timely. Four subcommittees were tasked with specific focus areas, and meeting were held over the summer. A final report was presented to the Maricopa County Board of Supervisors with suggested courses of action. This cooperative effort between government and industry has improved their working relationship. SBEAP represented the small business person on committees dealing with such issues as streamlining the air permitting process, permit fees, standard exemptions, and thresholds for emissions. It is critical their voice be heard when developing policy at the local or state level.</p>
Pima Cty. & Tucson	Continually increasing requests from businesses and the regulated community indicate the PDEQ Business Assistance Program is working, essential, and appreciated.
Arkansas	No comments.
California	A small business meeting group has been formed with local Air Districts and business representatives.

**TABLE F-3
(Continued)**

Program	Accomplishments
Colorado	A Memorandum of Understanding was established between the SBAP and the SBO. A joint workplan will be attached each year, outlining joint projects. CO is connected with all other western states through WESTAR. These alliances have helped the overall program. CO's SBAP/SBO has a working relationship with WY's SBAP, helping both programs. SBAP received the "Customer Service Award" from the CO Department of Public Health and Environment. An "Automotive Refinishing Requirements" book was written by the SBAP and was a huge undertaking involving the automotive trade group. This book has been considered very useful by the industry.
Connecticut	FAVRS (Financial Assistance for Vapor Recovery Systems) cited as a national model by EPA Administrator, Carol Browner. Recipient of Small Business Leadership Grant.
Delaware	No comments.
District of Columbia	<p>During the year, the resources of the SBAP of the Nation's Capital grew considerably from a one-person effort to a three-person team, with the addition of the SBO and the agency CAP member. Progress was made towards completing the composition of the CAP, which should become operational in 1996.</p> <p>Program has done some on-site assessments for auto body shops and conducted a presentation during a Title V workshop to further inform businesses about the program. Also made preparations for a small business workshop on Environmental Cost Accounting and Budgeting for next year's program.</p>
Florida	Florida SBAP has an active partnership with the pollution prevention section of the DEP. P2 is one of the key goals established by the Secretary of the Agency. Florida SBAP has effectively communicated to a majority of the small business community through outreach using teleconference programs and timely mailings regarding pending federal and state regulations. Florida SBAP developed and is now distributing copies of a multi-media guide for the dry cleaning industry. This information is reflective of future projects. Florida SBAP presently is coordinating an EPA Leadership Grant with the Florida Small Business Development Centers to provide technical information to a targeted audience.
Georgia	<p>SBO finalized an agreement between a small business and Environmental Protection Division allowing the business to increase its production. The Division also decided to provide similar relief to other facilities by revising the VOC rules to allow up to 10 tons per year of VOC before being subject to limitations.</p> <p>SBAP staff performed 10 dry cleaner site visits and 3 compliance audits, and participated in 3 environmental expositions.</p> <p>SBO resolved a conflict between Air Protection Branch and a small business.</p> <p>SBAP staff prepared 4 articles for inclusion in an environmental journal and 2 small business newsletters.</p> <p>SBAP staff provided assistance to over 200 businesses with questions about degreasers; only eleven of the businesses met the criteria for a small business.</p>

**TABLE F-3
(Continued)**

Program	Accomplishments
Hawaii	No comment.
Idaho	<p>During 1995, SBAP sponsored and participated in 6 statewide workshops for solvent/degreaser users. Working in cooperation with Idaho's P2 coordinator and other DEQ staff, a multi-media approach was provided that describes water, air, and hazardous waste issues associated with solvents. Participants talked to vendors about solvent substitutes and waste reduction. Approximately 200 people attended the 6 six-hour workshops.</p> <p>In October 1995, SBO met with small business programs from 11 western states. Since then, the group, known as WESTAR has worked together to better use scarce resources, avoid duplication of efforts, and address problems unique to the west.</p> <p>During 1994, the SBAP sponsored and participated in a dry cleaner teleconference delivered by EPA and the University of Tennessee. By partnering with the University of Idaho, Idaho State University, Boise State University, Lewis-Clark State University, and DEQ regional offices, teleconference was presented around the state. Approximately 75 of 112 dry cleaners in the state participated. This was an ideal example of how a one person operation (at the time) could utilize different resources to assist a large audience simultaneously throughout the state.</p>
Illinois	<p>SBAP has been a part of many related and exciting projects during the past year. Efforts in IL have been a partnership with DCCA (the SBAP) and the IEPA-Small Business Office. The Governor's Small Business Environmental Task Force provided 39 recommendations to assist small companies in dealing with environmental compliance issues. The report, completed in 1994, has been our road map in new activities. In December 1995, the U.S. SBA provided the Task Force with national recognition for their efforts. The award was one of 35 presented for "innovative and effective initiatives on behalf of small businesses," and was presented at the SBA National Legislative Conference by the Office of Advocacy.</p> <p>To date, we have implemented or began implementation on 19 of 39 recommendations. One of these was an environmental amnesty project. A pilot project in a two-county area near Rockford, IL was recognized by Governor Edgar. The pilot, which ran during Spring 1995, was deemed a success in helping small businesses. In November, Governor Edgar announced that "Clean Break" would become statewide in 1996. We are now seeking printers and autobody shops access this new opportunity to learn their compliance requirements, seek the assistance they need, and reach compliance with state regulations without the fear of enforcement. This innovative approach is helping the environment in IL and providing for communication between government and small businesses as never seen before.</p>
Indiana	<p>Five-Star Integrated Education Program for dry cleaners (including the development of a multi-media compliance manual and a recognition program). Five-Star Integrated Education Program for minerals aggregate industry (pending); this program will include the development of multi-media compliance manual and recognition program). Electronic fax-back and custom connect services. Consultant list application for Title V program. Open houses for scrap tire compliance. 40 presentations/workshops on Title V air permitting program. On-site compliance assistance program in southern Indiana (presently focusing on the Agency's new auto refinishing rule). Chromium electroplating symposium. Indiana's compliance assistance program is multi-media.</p>

TABLE F-3
(Continued)

Program	Accomplishments
Iowa	<p>Iowa EAP provides a full range of compliance and P2 services and provided brief assistance to over 3,500 clients and detailed assistance to over 700 clients. We trained approximately 12 other state SBAPs through the EPA SBO's Peer Match Program and are working with the SBO's office to develop a site visit training program.</p> <p>Iowa SBO unique in that the position functions under the direction of the Iowa Citizens' Aide/Ombudsman office, which is a legislative office with statutory powers to keep investigative records confidential and issue subpoenas. It is a non-partisan, independent agency where action can be taken to resolve complaints. This provides the SBO with support and information plus the distinct advantage of independence from any regulatory agency.</p> <p>SBO identified communication problems regarding information dissemination to small businesses. A major concern is the negative feelings small businesses have for the government and regulatory community. To further clarify and rectify these problems, SBO requested an additional \$10,000 from the IDNR to develop an outreach/educational plan. SBO also applied for a National Environmental Education Training Foundation grant to implement an electronic-based method of information distribution.</p>

**TABLE F-3
(Continued)**

Program	Accomplishments
Kansas	<p>Kansas was awarded a Small Business Leadership Grant in September 1995 for the development of training modules for small business environmental staff. The manuals will include basic science and P2 information. The grant, obtained and supervised by Kansas Department of Health and Environment, has been contracted to the SBAP component at the University of Kansas.</p> <p>Program has received positive comments when contacted by telephone. We receive many comments like, "You are really fast to respond," and "We have enjoyed working with you." These brief, unwritten comments serve to reward us for our work. We also know our printed materials are used, because requests for copies from businesses who "heard about it" from a friend or competitor. We have noted an increase in "repeat" callers.</p> <p>One of the first contacts made by SBO was with KS Department of Commerce and Housing, First Stop Clearinghouse (a service provided to thousands of new businesses each year). Commerce staff and SBO developed a workgroup of state, federal, and local agency staff who work with businesses, especially small ones. This Small Business Assistance Group is now comprised of staff from KDHE, KS Department of Commerce and Housing, SBA (Kansas City), KS Department of Human Resources, KS Department of Revenue, KS Department of Agriculture, Small Business Development Centers, and EPA Region VII. The group meets quarterly and various agencies describe their business services. The group's purpose is to foster a spirit of cooperation, ensure accurate referrals, share information about upcoming events (business fairs, conferences, workshops), and distribute other's printed materials. Special events are listed in various newsletters, where space is available for articles by other agencies. (For example, KS AIRLines SBAP newsletter provided space for an article written by KS Department of Revenue staff relating to a new tax for dry cleaners.) This group has been successful and at the request of industry, plans to develop business-specific materials.</p> <p>An Air Emissions Inventory Workshop was presented in 3 KS cities. Answers in a post-workshop questionnaire indicated all attendees rated the presentations as excellent or above average. The overall rating indicated most felt it was "excellent" with only one "average" rating.</p> <p>A survey was taken to gain opinions on the quality of technical assistance provided. Most responded with a "very helpful" rating and all would recommend the program to other businesses. One comment indicated, "This was the only place I could get answers."</p>

**TABLE F-3
(Continued)**

Program	Accomplishments
Kentucky	<p>Press conference held 3/1/95 to announce the Program and to introduce members of Small Business Stationary Source Advisory Panel, Director of Business Environmental Assistance Program (BEAP), and Air Quality Ombudsman.</p> <p>In 3/95, the owner of a printing business that had received assistance from BEAP testified before a legislative committee in support of the Program. She described to the committee how the assistance she received brought her business into compliance and the savings to her.</p> <p>Air Quality Ombudsman and a representative from the Division for Air Quality provided assistance to the Environmental Committee of the Kentucky Fabricare Association on legislation to be proposed during the 1996 legislative season. Purpose of the KY Drycleaner Remediation Act is to create a fund to clean up sites contaminated by drycleaning solvents with minimum state financial involvement. Assistance included copies of current regulations and resource materials on compliance with the CAAA along with copies of current mailing lists.</p> <p>In August 1995, the Jefferson County Air Pollution Control District employed a full time Ombudsman. On November 15, 1995, the Board of the District approved a pilot amnesty program for small business, which will be effective through 1996.</p> <p>A Program Plan was developed by SBTCP stating goals and objectives, describing eligible businesses, summarizing the duties of each Program component, and discussing legal issues. Plan will be finalized and distributed within KY and nationally during the first quarter of 1996.</p> <p>SBO and SBAP participate in quarterly program planning meetings with Division for Air Quality.</p> <p>SBAP provides information to clients on state pollution control tax exemption certificates. This exemption has traditionally been used by multi-million dollar manufacturing businesses, but is available to any KY business.</p> <p>In 11/95, SBO was contacted by the Printing Industries Association of Southern Ohio. The Association was completing training seminars on CAAA compliance for Southern Ohio printers and was interested in sponsoring similar seminars in KY. In late November, SBO met with representatives from the Association and three printing companies to discuss possible educational activities to be co-sponsored in KY during 1996.</p>

**TABLE F-3
(Continued)**

Program	Accomplishments
Louisiana	<p>LA SBAP received the "Special Achievement by a Team" award from the Secretary of the Department of Environmental Quality in December 1995. The citation read: With the passage of the Clean Air Act Amendments of 1990, each state was required to assist small businesses in complying with the Act. Many small businesses do not have the expertise or the finances to comply with the regulations. LA's SBAP has accomplished this goal in an outstanding manner. The programs is so well respected that is has been assisting other states in developing their SBAPs. The program has also received much praise from the small businesses that is has assisted. One business wrote, "I can't tell you how much I appreciate all the work you have done for us over the past seven months. Clearly, without your input, I would have been unable to fulfill the requirements for compliance with the Air Quality Standards.</p> <p>The Technical Assistance Group assisted the LA SBO in holding the first state Small Business Conference in New Orleans in January 1993, and cosponsored the EPA-sponsored State SBO/SBAP Conference in New Orleans in January 1995.</p> <p>The Technical Assistance Group, in conjunction with the SBO, has assisted many other states in developing their SBAPs.</p> <p>In 1995, SBAP assisted 141 small businesses with EIQs and permit applications and were contacted by another 1,003 small businesses to solve other environmental problems.</p>
Maine	SBAP recently adopted Small Business Compliance Incentives Policy based on EPA guidelines.
Maryland	No comments.
Massachusetts	MA Printers Partnership (MP2) formed. Developed self-certification statement for printers, 40 detailed questions on environmental issues to which printers must certify their performance and a workbook explaining each of the questions and providing additional information on compliance. Members are provided with window decals and frameable MP2 membership certificates.
Michigan	<p>Fall 1995, MI SBAP, also known as Clean Air Assistance Program (CAAP), presented its first set of training on the state's Renewable Operating (RO) permit program. The training was developed and delivered by SBAP staff at 10 statewide sites for business and industry and at one site for air quality consultants. Information was provided on MI's RO permit program and how to complete the RO permit application. Attendance exceeded 1,700.</p> <p>In conjunction with the RO training, MI's CAAP also presented a series of 10 statewide fall workshops for the autobody industry in cooperation with MI's Automotive Service Association (ASA). More than 600 attendees learned about the RO program and mechanisms for "opting out" of the RO permit program.</p> <p>Since its inception, MI's CAAP has developed several guidance publications for businesses seeking assistance with air quality matters.</p> <p>MI's CAAP is part of a wider, multi-media 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 meeting their environmental protection responsibilities.</p>

**TABLE F-3
(Continued)**

Program	Accomplishments
Minnesota	MN 1995 Annual Report.
Mississippi	No comments.
Missouri	Department of Natural Resources' Technical Assistance Program is multi-media and has assisted many small businesses in Missouri. They have responded in a timely and professional manner. Several businesses that received assistance wrote thank you letters commending the Technical Assistance Program for their efforts. These efforts have brought many small businesses into compliance with environmental regulations.
Montana	<p>U.S. Small Business Administration sent a letter thanking the SBO for assembling a guide of regulatory obstacles and recommendations for small businesses in Montana.</p> <p>SBO received numerous compliments for presentations delivered at three national environmental conferences.</p> <p>SBO was selected as the Region 8 representative for the national SBO/SBAP Steering Committee. SBO helped create a small business environmental awards program in Montana.</p> <p>SBO helped create a small business environmental awards program in MT with Small Business Administration, MT Chamber of Commerce, and MT State Pollution Prevention Program.</p>
Nebraska	The program is "alive and well and will continue to grow." For a large state in area and a small program in staff, NE's SBAP is doing quite well.
Nevada	A Strategic Plan was created for the program to provide a clear direction to activities.
New Hampshire	<p>Developed a multi-media "Small Business Guide" to environmental awareness.</p> <p>Presentations: 1995 SBO/SBAP National Conference, 1995 (Spring) National P2 Roundtable Conference, 1995 N.H. Pollution Prevention Conference.</p>
New Jersey	No comments.
New Mexico	With the assistance of a University intern (August-December 1995) from its Public Administration Program, the Air Quality Assistance Program for Small Businesses in Albuquerque was able to develop a directory of over 100 businesses (mostly within New Mexico) that can provide environmental service assistance to the regulated businesses community. This is especially necessary to businesses that may require assistance beyond the scope of the SBAP.

**TABLE F-3
(Continued)**

Program	Accomplishments
New York	<p>Amnesty program established in NY due to persistent efforts of SBTCP. Over a year of negotiations with the regulatory agency led to the establishment of the program, which eliminates penalties for small businesses that commit to correct violations within 120 days. For example, an autobody shop was issued a summons by an Environmental Conservation Officer (ECO) for not having a Certificate to Operate. The ECO was not aware of the Department's small business amnesty policy in which a source is should be given a "notice to cure" rather than having an enforcement action initiated. The SBAP worked with Central Office legal staff to have the ECO informed of the new policy and dismiss the case. SBAP is working with the source owner to file a letter of intent under the amnesty program and to apply for the proposed small source exemption, since the source's annual emissions are about 100 pounds per year. The source is in compliance with the state's surface coating regulation by using compliant coatings.</p> <p><i>Many businesses without certificates to operate called the SBO, but were in compliance with the substantive regulations. SBO helped businesses send "letters of intent" to the regulatory agency so that the businesses could obtain a certificate to operate.</i></p> <p>Until recently, regulators did not consider the effects of compliance on production capacity. With the increased awareness of the importance of maintaining jobs and protecting the environment, the CAAA assistance programs provide assistance to ensure both goals are met. For example, an upstate surface coater was helped to comply with regulations by switching to water-based coatings. While this switch took care of the firm's compliance problems, it created a new problem: with the use of waterborne coatings came slower application and curing rates. To remedy this situation, the firm installed an additional spray booth to maintain previous production levels. To complete the circle of assistance, the SBAP helped the firm prepare its application for a permit to construct the new booth. The regulatory agency was happy, because the firm complied, and the firm was happy, because it was in compliance and maintained production capacity.</p> <p>Through SBTCP's input during the regulatory process, streamlined permitting procedures for small businesses have been incorporated into NY's operating permit program, which will reduce costs to permit minor sources. During the rulemaking process, the regulated community frequently is not aware of the ramifications these amendments will have on their facilities. This is the case with the amendments NY has proposed regarding permitting regulation, for which SBTCP prepared comments. NY proposed to use the same permit application for both major (Title V) and minor sources, which would have resulted in tremendous regulatory burden for small businesses with no environmental benefit achieved. Through SBTCP's efforts, NY revised its proposal to include a simplified registration process for minor sources. This reduces the permitting burden for small businesses and improves the technical assistance program by allowing it to focus on prevention or control programs (MACT, RACT, P2). SBTCP was successful in adding exemptions to states' permitting requirements for unregulated minor sources (batch bakery ovens and pad printing processes).</p>

TABLE F-3
(Continued)

Program	Accomplishments
North Carolina	<p>Rule changes advocated by this Office have resulted in the elimination of the need for permits for several thousand small businesses otherwise required to have a permit under North Carolina Air Quality Regulations. Small business sectors served include: gasoline service stations, cotton gins, small grain elevators, dry cleaners, sawmills, small electric motor repair businesses, coatings, solvent cleaners, graphic arts, emergency generators, hosiery manufacturers, and peak shaving generators.</p> <p>Small businesses now regularly has a seat at the table as air rules and procedures are developed through participation by the SBO/SBAP staff on internal Air Quality workgroups and an outside involvement workgroup.</p> <p>A permit reform initiative has been undertaken in NC. The SBO was appointed to a Task Force of 10 members to make recommendations to the Secretary of the Department of the Environment, Health, and Natural Resources and the NC General Assembly on how to improve the environmental permit process and expand permit assistance.</p>
North Dakota	<p>SBO can conveniently walk across the hall and visit the Director of the Air Pollution Control Program (who also is a CAP member), SBAP Coordinator, or any member of the Air Pollution Control Program. This arrangement is conducive for informal and frequent meetings between the SBO and SBAP/Air Pollution Control staff.</p> <p>SBO is invited to attend the Environmental Health Section Division Directors' meetings, which are held twice a month. This helps the SBO to be aware of media program and policy developments that may have an impact on small business and provides an opportunity for SBO to present new concepts (self-audit policy).</p> <p>SBO working directly with media programs to standardize, where possible, the permit process.</p> <p>SBO serves as a clearinghouse for P2 documents for the Environmental Health section.</p> <p>SBO and SBAP received training from Louisiana SBAP in 1995.</p>
Ohio	<p>With significant funding from OH Air Quality Development Authority and OH Environmental Education Fund, SBO and SBAP cooperated closely with Printing Industry of OH. PIO initiated "Enviroprint Ohio," which produced a self-help guide to environmentally sound printing operations. The project is conducting a series of training sessions around the state. By the end of 1995, these sessions had reached 100 printers. Mailings also have been sent to over 2,500 printers.</p>
Oklahoma	<p>No comments.</p>
Oregon	<p>Adopted a Mission Statement and a Communications Plan. Implemented a confidential multi-faceted small business technical assistance program. Charter member of the Portland Pollution Prevention Outreach Team. SBAP Small Business Development Center Education Project. Small business cross-media dry cleaner "Green Sticker" project. VOC Limited Amnesty Project. Charter member of WESTAR (SBAP network group). Member national and regional pollution prevention roundtables.</p>

**TABLE F-3
(Continued)**

Program	Accomplishments
Pennsylvania	No comments.
Puerto Rico	No comments.
Rhode Island	<p>RI DEM's P2 program awards received include: Environmental Achievement Award from the National Environmental Awards Council, 1990; Robert Rodale National Environmental Achievement Award, 1991; Certificates of Environmental Achievement from Renew America and National Awards Council for Environmental Sustainability, 1995.</p> <p>RI DEM's P2 program is responsible for bringing in over \$900,000 in funding to help industry sectors such as autobody, fish processing, and textiles. Also assisted state's largest POTW to set up its own P2/technical assistance program.</p> <p>Ran a \$700,000 grants program where 12 industries studied and/or implemented P2 techniques and technologies in their facilities. Projects included elimination of methyl-ethyl-ketone from a chemical manufacturer and implementation of high-transfer efficiency coating techniques in the boat-building industry.</p>
South Carolina	No comments.
South Dakota	No comments.
Tennessee	<p>TN Air Pollution Control Board, which has the authority to establish the program's funding level, has been complimentary of program efforts following program update presentations. TN Association of Business complimented activities conducted by the program.</p> <p>A regional business publication included a four-column article on the program</p> <p>Program workshops received press coverage, including mention on the front page of a major newspaper and a front page article in the business section.</p> <p>Two state SBAPs and a foreign country representative attended program workshops.</p> <p>One business owner commented after a CAA Overview workshop that the statement, "I'm the government and I'm here to help" is really true.</p> <p>Workshop evaluations indicated the participants found the workshop to be "good" to "excellent."</p> <p>National teleconferences were initiated by TN on regulatory compliance for small businesses. Teleconferences targeted the first small business industry groups regulated under CAAA, which include dry cleaners, chrome platers, and vapor degreasers.</p>

**TABLE F-3
(Continued)**

Program	Accomplishments
Texas	Peer Match Grant (\$25,000) to provide training to other states on how to set-up small business assistance programs. Leadership Grant (\$93,750) to establish a simple method that enables small businesses determine true environmental cost of doing business. RCRA Grant (\$44,000) to assist small businesses with the management of their hazardous waste. P2 Grant (\$37,214) for proper spray booth use and demonstration.
Utah	<p>Preliminary results of the small business permit application Amnesty Program indicate that small businesses welcome the opportunity to achieve compliance. Many small businesses were unaware of the Division's permit requirements and assistance available.</p> <p>SBO has been actively involved with the Salt Lake Rotary Club's Environmental Committee as Vice Chair. The "Clear the Air" Awards Program for vehicular emissions reduction was initiated in September. Through the end of 1995 during Rotary meetings, where a standard 250 members attended, a "Clear the Air" spirit theme was introduced with informational flyers, brochures, and promotional items.</p> <p>In 12/95, 9 category award winners were selected from 27 entries in the "Clear the Air" Awards Program. Awards were based on commitment, innovation, and leadership criterion. Lt. Governor and DEQ and DAQ Directors presented awards at a luncheon. 1996 program will expand into business emission reductions and technologies and unique pollution prevention methods.</p> <p>During the past six months a closer working relationship with DAQ small business services has resulted in greater customer service efforts. Division Director called for development of unified small business mission statement and workplan, which will track and review activities and identify gaps and duplication in service delivery.</p>
Vermont	Vermont does not have an SBAP, however current programs of the Air Pollution Control Division have effectively assisted small business for several years. This assistance includes free workshops for industry (e.g., Operating Permits Workshop) and occasional on-site assistance. The staff of engineers are accessible to businesses and provide requested information on a regular basis.
U.S. Virgin Islands	No comment.
Virginia	No comment.
Washington	"We try to do our stuff with cross-program, multi-media focus in mind."

TABLE F-3
(Continued)

Program	Accomplishments
West Virginia	<p>SBAP and SBO have coordinated five periodic meetings with various other agencies and organizations providing environmental compliance and pollution prevention assistance. These include WVDEP Pollution Prevention Services; WVDEP Waste Minimization; Marshall University Center for Environmental, Geotechnical, and Applied Sciences; Marshall University Procurement Technical Assistance Center; Robert C. Byrd Institute for Advanced Flexible Manufacturing; West Virginia University Industrial Extension Service; and National Institute for Chemical Studies.</p> <p>SBO has made significant progress in influencing enforcement supervisors to place a higher emphasis on considering the ability to pay for small businesses in assessing penalties.</p>
Wisconsin	<p>WI CAP member attended the CAP training session in Pittsburgh, 10/95. WI DOD staff member represents Region V in periodic staff meetings via national conference calls with all 10 EPA regions. 22 publications have been created in 1995 and the program has reached over 18,000 WI businesses.</p>
Wyoming	<p>No comments.</p>

APPENDIX G

COMPLIANCE ASSURANCE ISSUES

**TABLE G-1
COMMON COMPLIANCE PROBLEMS**

Compliance Problem	# Programs	% Programs	Programs Responding (by EPA Region)
Not understanding regulatory requirements	22	42	Region 1: MA, ME, NH Region 2: NY Region 3: DC, MD Region 4: AL, MS Region 5: IN, MI, OH Region 6: AR, LA, OK Region 7: IA, KS, MO, NE Region 8: CO, NE Region 10: OR, WA
Operating without a permit	19	36	Region 1: ME, NH Region 3: MD Region 4: GA, KY, NC, SC Region 5: IL, IN, MN Region 6: LA, OK, NM Region 7: IA, KS Region 8: CO, UT Region 9: AZ Region 10: OR
Uncertain of permitting requirements	17	32	Region 1: ME, NH Region 2: PR Region 3: DC, MD Region 4: AL, NC, TN Region 5: IN, IL, OH Region 6: LA, NM Region 7: MO Region 8: CO, UT Region 10: WA
Incomplete record keeping	8	15	Region 2: NY Region 4: GA, NC Region 6: LA, NM, TX Region 7: NE Region 10: OR

**TABLE G-1
(Continued)**

Compliance Problem	# Programs	% Programs	Programs Responding (by EPA Region)
Financing for control requirements	5	9	Region 2: PR Region 4: TN Region 5: OH, WI Region 8: CO
Uncertain how to determine emission inventories	5	9	Region 4: NC Region 5: WI Region 6: LA Region 8: NE Region 10: OR
Uncertain how to complete forms	4	8	Region 2: PR Region 4: TN Region 7: MO Region 9: AZ
Operating outside NSPS or MACT	4	8	Region 4: MS Region 6: LA Region 7: NM Region 8: WY
Improper disposal of hazardous waste	4	8	Region 1: MA Region 4: AL, KY Region 6: LA
Fear of arbitrary regulatory enforcement	3	6	Region 2: NY Region 5: WI Region 6: AR
Overwhelmed by quantity of regulations	2	4	Region 2: NY Region 5: MI
Lack of sufficient notification by regulatory agency	2	4	Region 2: NY Region 5: IN
No manifest for special or hazardous waste	1	2	Region 5: IL

TABLE G-1
(Continued)

Compliance Problem	# Programs	% Programs	Programs Responding (by EPA Region)
Uncertain as to which government agency to contact	1	2	Region 5: IN
Labeling of storage areas	1	2	Region 1: MA
Need for multi-media permits	1	2	Region 5: IN

TABLE G-1
(Continued)

PROGRAM RESPONSES

Programs were asked for information on the most common compliance issues addressed during the course of providing technical assistance. Individual program responses are listed below. Comments are edited for space.

PROGRAM	COMPLIANCE ISSUES
Alabama	<p>Since the assistance provided through SBO is multi-media, we tend to field many more questions on solid/hazardous waste and water discharges than on air issues. The majority of calls received from small businesses center on whether or not they are required to have a permit for a particular process, and if so, what their permitting options are and how to apply for a permit.</p> <p>Since the hotline is open to the public to register complaints, we receive many complaints about small businesses, primarily on improper use and disposal of chemicals, dust, odor, and noise. While some of these problems are a result of illegal activities, many are a result of activities that are not regulated. The root cause of the unregulated activities is poor zoning or lack of zoning.</p>
Alaska	No response.

**TABLE G-1
(Continued)**

Arizona	No response.
Pinal Cty.	<p>The most pervasive "compliance" problem discovered arises from the reality that (1) permit files have traditionally lacked a comprehensive, but concise, disclosure and analysis of facility operations and a meaningful analysis of potential emissions; (2) permits have traditionally been meaningless bread sandwiches that contained more or less language, but no substance, and certainly no compliance regimen that produced emission limitations that were enforceable as a practical matter; and (3) the necessary consequence was that no one could afford to devote the effort to even figure out what a source was doing, much less whether it was in compliance with applicable requirements.</p>
Maricopa Cty.	
Pima Cty. & Tucson	
	<p>About 40% of business assistance contacts involved incorrect or incomplete permit applications. Of these, about 80% were due to lack of knowledge. Most businesses had problems with portions of the application forms. Once they understood what was being asked or how to prepare their data, they were able to complete the application on their own.</p> <p>About 30% of businesses referred to the Business Assistance Program by enforcement section staff were operating without a permit. Most owners did not know that air quality rules existed or that they applied to their businesses. These businesses accounted for about 15% of all business assistance contacts.</p> <p>Small autobody repair facilities made up the largest portion of businesses that were operating without a permit.</p>
Arkansas	Knowledge of regulations. Fear of regulatory agencies.
California	Since the Local Air Districts issue the permits, this is largely inapplicable at our state level.
Colorado	Lack of money to implement control technology. Confusion about regulations. Lack of permits. Lack of knowledge about what is required by law.
Connecticut	Unpermitted emissions. Confusion over reporting requirements. Lack of information on new requirements.
Delaware	Program not in existence long enough to have this information.
District of Columbia	Facility operations do not understand what they are required to do in order to comply. SBO concentrated on explaining the regulations to them.
Florida	No response.

TABLE G-1
(Continued)

Georgia	Inadequate record keeping and facilities operating without permits.
Hawaii	No response.
Idaho	We did not gather information for this question.
Illinois	Unpermitted equipment in manufacturing and metal parts fabricating, operating permits and pollution control device permits for air emissions. No manifests for hazardous and special wastes. Auto repair/air conditioning Title V not certified; some have air permits and no land permit. Businesses need multi-media permits.
Indiana	Contacting the right Agency staff regarding specific regulatory requirements. Not award of specific regulatory responsibilities (Title V, NESHAP, MACT). Lack of adequate communications between Agency and businesses. Rules are too complex. Lack of permits for new equipment or changes in processes. Unpermitted emissions.
Iowa	Nearly all clients need to get New Source Review Permits, and many need Operating Permits or Voluntary Operating Permits. Very few are aware that they need to comply with any requirements.
Kansas	Lack of understanding of regulations. When explained in plain English, most facilities are willing to comply. There is frustration from overworked, non-technical people who have been given the responsibility for environmental issues without proper background or training. Some industries did not understand that a permit was required, but when explained, were willing to comply.
Kentucky	SBAP assisted 3 facilities that did not have construction and operating permits.
Louisiana	Companies operating without air permits. Improper disposal of hazardous waste. Incomplete record keeping. Updating emissions. Operating outside regulated limits. Difficulty in understanding regulations.
Maine	Businesses not knowing they were subject to certain regulations. Not understanding regulatory requirements. Not having necessary permits. Problems are across all industry sectors.
Maryland	Confusion about applicable compliance requirements. Lack of state air permits. Record keeping did not meet prescriptive requirements of federal rules. Confusion about waste regulations.

**TABLE G-1
(Continued)**

Massachusetts	<p>In general, the greatest area of non-compliance has been minor hazardous waste violations (e.g., labelling storage areas). Another significant area is unpermitted operations and lack of permits for new equipment. Massachusetts has begun a major renovation of its outreach and permitting activities. This "Environmental Results Project" (ERP) is designed to simplify or eliminate from permitting requirements many of the small sources that have had problems understanding permitting requirements until now.</p> <p>The MP2 program (printers partnership) is the first wave of that effort and may be more process-specific than later ERP efforts will be. However, because of its industry-specific nature and self-certification structure, it is viewed as a possible template for later ERP efforts. We'll know more when the moratorium is completed and the project is evaluated for effectiveness. We will be looking at the percentage of possible printers that enrolled, how many previously un-permitted sources came into the system under the program, and where possible, quantify emission reductions from specific program facets and overall emission reductions.</p> <p>Difficulty in understanding the exact requirements as stated in the regulations has led to increased efforts to publish "plain language" summaries of the regulations in addition to their statutory language.</p>
Michigan	<p>In Michigan, businesses must comply with a tremendous volume of government regulations on a day-to-day basis ranging from environmental to labor force. For some businesses, this is overwhelming. The states' SBAP should be or are synthesizing these regulations/requirements into more simple and understandable terms for such businesses. To address this issue, Michigan is in the process of developing handbooks for specific industries (e.g., dry cleaners) that contain a comprehensive, yet simple organization of the requirements.</p>
Minnesota	<p>MN 1995 Annual Report.</p>
Mississippi	<p>Dry Cleaning Industry: incomplete reports and operating outside of MACT. Dry Cleaning Industry (Petroleum) NSPS: incomplete reports and operating outside NSPS.</p>
Missouri	<p>Missouri Department of Natural Resources' Technical Assistance Program is multi-media and receives requests for all types of environmental compliance assistance. In regard to requests for CAAA assistance, Emission Inventory Questionnaires (EIQ), construction, and operating permit assistance ranks at the top. Many small businesses have never completed an EIQ and request our assistance. Other requests are from facilities that were not aware they needed a construction permit before they installed their equipment and subsequently received a "Notice of Violation" (NOV) when they were inspected by the department's air inspectors. These facilities are referred to us for assistance in completing an application for a construction permit. Others request assistance in completing their construction permit application before installation. The operating permit is a new requirement for MO's small businesses and they have been requesting training and assistance in completing these applications.</p>
Montana	<p>Unpermitted emissions. Operating outside MACT standards. Operating outside state standards (particularly prevalent in automobile refinishing).</p>
Nebraska	<p>Not knowing how to figure emission inventories, poor understanding of the rules and regulations, incomplete or inaccurate information.</p>
Nevada	<p>N/A</p>

**TABLE G-1
(Continued)**

New Hampshire	Lack of a formal system for assuring regulatory compliance or exemption. Lack of information on how to comply with new regulations. Lack of evaluation of the potential impact of operations on the general public or the environment. Lack of permits to limit PTE.
New Jersey	No response.
New Mexico	The most common compliance problem identified of facilities subject to MACT are incomplete reports and incomplete paper work. Operating without a construction permit is the most common compliance problem for sources not subject to MACT standard.
Bernalillo Cty.	For MACT standards, common problem is lack of information and therefore incomplete reporting/recordkeeping. Other compliance problems involve general lack of information and knowledge of local air regulations involving registration or permitting of sources.
New York	Problems are consistent across all industry sectors. Not having an operating permit for air contamination sources. Not understanding requirements of an operating permit. Not maintaining records to document emissions. Not being aware of environmental requirements at state, federal, and local levels. Lack of sufficient notification of businesses by regulatory agency. Difficulty of small businesses in obtaining a clear and straightforward answer from regulatory agency about what is needed to achieve compliance. Small businesses are frequently not able to get answers from regulatory agencies; many times access is limited because telephone lines are constantly busy, and if able to get through, regulatory staff often do not return calls. Businesses fear that by talking to regulators, this will cause their facilities to be targeted for additional scrutiny; some companies voluntarily approaching regulatory agencies then are penalized, while other companies that do not come into compliance are overlooked by the agency. Regulatory flexibility not available for special conditions including small emitters and companies manufacturing specialty products. Permit applications are complicated and there is a long lag time from applying to receiving permits. Businesses are frustrated by the multiple layers of regulatory requirements. Businesses frequently are under the impression that if they apply for and are issued one permit, then they are in compliance with all requirements.
North Carolina	Unpermitted facilities. Confusion about whether an air quality permit is required. Lack of technical expertise to identify air pollutants, emission sources or points, and calculating emissions. NC Air Quality Section has about 4,000 permitted facilities in North Carolina. The number of facilities not complying with air quality regulations is unknown.
North Dakota	The most common problem is small businesses understanding the regulations, which should be written in a manner that is much easier to understand. EPA should change their "once in - always in" policy for MACT standards.

**TABLE G-1
(Continued)**

Ohio	<p>The single most common "compliance problem" identified to the SBO is inability to understand the regulations or rules and how they apply to a particular business. This lack of "plain English" explanations is a problem with both federal and state programs. The second most frequent problem is determining how to pay the costs of compliance.</p> <p>SBAP experience identifies the following: lack of permits, misunderstanding permit application forms, and lack of awareness of air pollution regulations. These problems are common to all industry sectors.</p>
Oklahoma	<p>The most notable compliance problem that has been observed is those facilities that need an air quality permit and do not have one. Up to this point, most facilities out of compliance with permitting need a state permit. However, with recent final interim approval of our state's Part 70 program, there are an increasing number of facilities that are in need of Title V permits or at least synthetic minor (state) permits.</p> <p>Secondly would simply be the ignorance of the small business community regarding air quality regulatory issues. NESHAP vs. NSPS vs. Title V vs. state requirements vs. federal requirements. They don't even begin to know how to talk the language, make their way through the complex flow chart of decisions that need to be made, and where they are trying to go.</p>
Oregon	Don't understand regulations. Don't keep accurate records. Don't practice P2. Have not calculated emissions. Operating without a permit. Don't understand cross-media emissions transfer. Lack of knowledge of alternative technologies.
Pennsylvania	No response.
Puerto Rico	Submitting permit applications with the required documents including evidence of Planning Board permits. Efficient control equipment for businesses at low cost.
Rhode Island	The most common compliance issue has been the reduction of emissions to bring companies under emissions caps. A small number of facilities have approached us with specific process problems.
South Carolina	Unpermitted emissions. Permits for new equipment or process changes.
South Dakota	South Dakota has not experienced a compliance problem.
Tennessee	Not understanding how to complete forms. Not understanding required controls (dry cleaners). Uncertain of permit requirements, particularly for process change. Understanding which government agency to contact. Financing for control requirements.

TABLE G-1
(Continued)

Texas	<p>Concern about leasing property to printers, dry cleaners, gas stations, etc. that might generate toxic or hazardous waste. Lack of funds to purchase compliance equipment. Lack of awareness of environmental regulations (i.e., do not know generator status). Lack of guidance for classification as either an industrial or non-industrial generator.</p> <p>Dry Cleaners: Lack of funds to purchase equipment. Soil contamination clean-up problems related to the uniform standards established under RCRA. States need flexibility to assess the risks associated with each site rather than imposing universal clean-up standards for all sites.</p> <p>Printers: New inks and solvents may not be compatible with existing equipment; would be expensive to replace.</p> <p>Metal Finishers: Lack of funds for pollution abatement equipment. Unable to get stacks tested. Recordkeeping and storage for hazardous waste.</p> <p>Autobody Shops: Unable to meet wipe-down solution standards. The allowable pounds VOC per gallon is 1.4. The VOCs per gallon of product available is 6.2 pounds.</p> <p>Gas Stations: Lack of funds for control equipment. Soil contamination from leaking petroleum storage tanks. TX is prohibited from offering extensions for installation of stage II equipment at some small gas stations due to the definition of an Independent Small Business Marketer of Gasoline as defined in the CAAA.</p> <p>Thermoset Resin: Nuisance odors.</p>
Utah	<p>Stack Testing and Control Equipment Requirements: Several small businesses that are subject to hard chromium electroplating emissions limitations have expressed concern about complying with the stack testing and control equipment requirements. Many such facility owners are concerned, since they use less than 10 pounds of chrome annually.</p> <p>Basic Permit Information Simplification Needs: Due to regulatory complexities, many small businesses lack knowledge or the terminology to comprehend permitting requirements and do not obtain necessary permits (e.g., wood furniture coating, foundries, and chromium electroplater industries). Businesses experience difficulty in understanding how to complete inventory sheets, read MSDSs, or determine when permits are required due to process change or expansion. Simplification of this information would be helpful in providing compliance opportunities where none seem present. This became apparent when conducting a targeted industry outreach effort with the printing industry, yet this is a common issue.</p> <p>Continued Technical Support Needs: Often, small businesses lack necessary equipment and expertise to perform monitoring requirements for MACT standards and the state air quality permits.</p>
Vermont	No response.

TABLE G-1
(Continued)

Virginia	<p>VA's compliance assistance efforts have been primarily directed at the source categories coming under regulation by the Maximum Achievable Control Technology (MACT) standards. The most common problem has been the difficulty of the foreign national ownership of the dry cleaners to fully grasp what information was necessary on the initial notification report form and the pollution prevention compliance report form. In particular, the most difficult concept has been that of the twelve month rolling average. A great deal of time has been spent coaching the dry cleaners in the correct preparation of the necessary compliance forms.</p> <p>With respect to the small businesses that have had some form of regulatory responsibility, the most common difficulty has been their lack of knowledge that they were a regulated entity and consequently operating without a permit. This situation has not arisen too many times yet, but as we begin to expand the compliance outreach efforts to printers, wood finishers, and other solvent users, it is expected that the size of this problem will increase.</p>
Virgin Islands	No response.
Washington	Complexity of regulations.
West Virginia	For new requirements, such as MACT, businesses either have not been aware of the rule or do not know the specific requirements. We have many clients who were apparently unaware of state requirements that have existed for many years. Some confusion may arise due to changing agency policy and focuses over the long term. Generally, companies that have some level of environmental awareness are primarily concerned about solid and hazardous waste issues where long-term liability may become a major exposure.
Wisconsin	Cost of new equipment or modifications required by environmental regulation. Concerns about the amount of time required to prepare permits or record keeping. Fear that regulatory enforcement will be arbitrary and capricious. Difficulty in completing required mathematical calculations to determine MTE and PTE.
Wyoming	Understanding MACT standards by dry cleaning businesses. Understanding MSDS sheets by solvent/degreaser businesses. Applicability of CFC regulations by auto wrecking yards.

TABLE G-2
IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE

Improvements	# Programs	% Programs	Programs Responding (by EPA Region)
More open communication between sources and regulatory agencies	26	49	Region 1: NH, RI Region 2: NY, VI Region 4: AL, KY, SC, TN Region 5: IL, IN, MI, MN, OH Region 6: AR, NM, OK, TX Region 7: MO, NE Region 8: CO, UT, WY Region 9: AZ, CA Region 10: OR, WA
Increased compliance	23	43	Region 1: MA, ME, RI Region 2: NY, VI Region 4: AL, NC, TN, SC Region 5: IL, IN, WI Region 6: OK, TX Region 7: IA Region 8: CO, ND, SD, WY Region 9: AZ, CA Region 10: OR, WA
Greater understanding of the regulations	20	38	Region 1: MA, NH Region 2: NY, VI Region 3: MD Region 4: KY, NC, TN Region 5: IN, WI Region 6: NM Region 7: IA, NE Region 8: CO, ND, SD, UT Region 9: AZ, CA Region 10: WA

**TABLE G-2
(Continued)**

Improvements	# Programs	% Programs	Programs Responding (by EPA Region)
Reduced apprehension regarding environmental compliance	18	34	Region 1: NH Region 2: NY, VI Region 4: AL, KY, SC Region 5: IL, IN, MI, OH Region 6: AR, OK Region 7: MO, NE Region 8: CO, WY Region 9: AZ Region 10: WA
Improved attitudes about complying with regulations	17	32	Region 1: NH, RI Region 2: NY, VI Region 4: AL, SC Region 5: IN, MI, OH Region 6: OK, NM Region 7: NE Region 8: CO, UT, WY Region 9: AZ, CA
Inclusion of environmental compliance early in business plans	9	17	Region 2: VI Region 3: DC Region 4: TN Region 5: MI, MN, WI Region 6: NM Region 9: CA Region 10: OR
Increased registration and permitting of existing sources	5	9	Region 3: MD Region 4: NC Region 5: WI Region 6: MN Region 8: ND

TABLE G-2
(Continued)

Improvements	# Programs	% Programs	Programs Responding (by EPA Region)
Better record keeping	5	9	Region 2: NY Region 3: MD Region 4: NC Region 7: IA, NE
Improvement in pollution prevention management practices	5	9	Region 3: DC Region 5: MN Region 6: NM Region 10: OR, WA
Greater environmental understanding through on-site visits (versus phone calls or mailings)	3	6	Region 1: MA, ME Region 5: OH
Recycling and reuse	1	2	Region 6: NM
Better hazardous waste disposal	1	2	Region 6: NM

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	More small business people are calling early on in the planning process of a new business or facility expansion to find out what environmental regulations apply and what permits are needed. This allows them to better factor in the costs and time requirements of starting the new operation and avoid "surprises."
Alaska	No response.

TABLE G-2
(Continued)

Arizona	No response.
Pinal Cty.	Our "compliance assistance" constitutes an integral element of day-to-day permitting and inspection activities. Our permit reviews and permit documents have hopefully improved to the extent that they enable meaningful compliance reports and meaningful inspections. Accordingly, we can offer far better assurance that sources are in compliance. (That doesn't mean they weren't in compliance earlier, just that we had no way to formulate a meaningful opinion as to what situation existed.)
Maricopa Cty.	
Pima Cty. & Tucson	<p>The department's education program, consisting of seminars, publications, site visits, etc. has begun to impact a large percentage of the entire small business community. Evidence of this is shown through the increased awareness of environmental concerns, primarily air and waste, articulated by small business owners during their contacts with staff.</p> <p>There has been a steady increase in the number of businesses seeking assistance. It is believed that business assistance activities have helped owners overcome the normal reluctance to seek assistance from the department. Additionally, business owners have acknowledged a change in the department's approach toward sincerely helping businesses find workable environmental solutions before pursuing enforcement actions. Business assistance activities, including outreach and education, help business owners overcome misconceptions and difficulties attributed to environmental rules and regulations.</p> <p>A noted improvement is the effect one successful site visit has on other members of a particular business sector. For example, timely and accurate assistance provided to one print shop, without the feared follow-up enforcement visit so many owners anticipate, generated several calls for assistance within the following weeks. This is an effective public relations tool among small business owners.</p> <p>The trust and respect developed between the business owner and staff person help foster a frank and open dialogue. In turn, the business owner is more prone to contact the department when he/she has a problem, because they no longer fear retribution. Instead, they know the department will help them find workable solutions to their environmental concerns.</p>
Arkansas	The regulatory agency is being perceived as less enforcement-oriented and more helpful.
California	The many publications (with CA's Annual Report) and their wide distribution has greatly increased awareness of regulatory requirements and who to contact to get help. Accordingly, the number of contacts has increased significantly. Our education efforts have resulted in significant improvements in self-compliance.

TABLE G-2
(Continued)

Colorado	In the industries with active trade organizations, the level of awareness has greatly improved, along with the level of voluntary compliance. These industries include dry cleaners, auto body shops, and printers.
Connecticut	More sources are willing to seek information and assistance from a regulatory agency. More small businesses involved and informed about the regulatory developments.
Delaware	No response.
District of Columbia	Better understanding of what the priorities are in preventing pollution in their work place and how to avoid compliance actions.
Florida	No response.
Georgia	This is an area that we have not tracked.
Hawaii	No response.
Idaho	We did not gather information for this question.
Illinois	Small businesses are much more likely to call if they even have a remote idea that they may be doing something wrong or need a permit they don't have. Their apprehension regarding environmental regulation and pursuing assistance has been drastically reduced by continual interaction between our program and small business.
Indiana	Trust level between Agency and businesses has improved significantly. Communication between Agency and businesses have improved significantly. Businesses are more willing to contact Agency personnel for guidance and for clarification on specific issues. Businesses expresses willingness to comply with regulations as long as they understand what is required of them. Compliance among businesses have improved. Businesses expressed appreciation for Agency outreach and education efforts.
Iowa	<p>For companies that use targeted processes, such as spray painting, it has been significant. Nearly all autobody shops in the state are now aware that permits are required and about 500 have been introduced to the state permit-by-rule option. This has resulted in about 500 less permit applications that need to be processed. An improvement in compliance exists as a direct result of on-site activities because clients are provided with assistance until they are in compliance or until they choose to remain out of compliance.</p> <p>Although difficult to quantify, SBO outreach efforts to a broad spectrum audience -- local community leaders, statewide associations, individuals, and professionals -- have resulted in increased awareness of the IAEAP and the resources available to small businesses. SBO has provided important one-on-one contacts that have provided valuable information to those who were previously unaware of their compliance requirements under CAAA.</p>

TABLE G-2
(Continued)

Kansas	<p>Businesses are often fearful of regulatory agencies. When assistance is offered by university staff (through the technical assistance contract), free of charge, businesses are grateful for the help. The technical assistance component sends follow-up surveys on six month schedules to note if changes have been made. In most cases, recommended improvements were made.</p> <p>Most businesses want to comply with environmental regulations. They may be afraid to ask questions, but when a nonthreatening assistance program is available, they are most anxious to take advantage of the services.</p> <p>SBO receives many calls asking about needed changes and how to get information without fear of enforcement actions. Through the technical assistance program, improvements are made and businesses come into compliance voluntarily.</p>
Kentucky	<p>The program has resulted in submission of better quality permit applications and regulatory information to the Division for Air Quality. This has led to a shorter review time, improving the relationship between the Division and small businesses. The information provided to small businesses by the SBAP staff has increased awareness of the Division's role in environmental regulation. Through meetings, presentations, and her monthly column, the SBO is building a good working relationship with state trade associations. The monthly column is published in 9 state trade association newsletters with a circulation of 15,000.</p>
Louisiana	<p>Improvement in "paperwork" compliance. Better hazardous waste disposal. Changes to low solvent paints. Recycling/reusing solvents. Proposed sandblasting rules were put aside, however, permits using criteria and shipbuilders still want to discuss. Many new contacts come to us from referrals.</p>
Maine	<p>There is a definite rise in compliance among the industry sectors we have targeted. Until the businesses were notified by the SBTAP, the vast majority had no idea they were even regulated. After initial notification, hundreds of businesses call on the "800" number to ask questions. When we are done with the conversation, the businesses understand the rule. Several on-site visits have led to quantifiable reductions in the use of chlorinated solvents.</p>
Maryland	<p>There is a definite increase in awareness of federal compliance requirements in targeted industry sectors. We get calls for specific questions from businesses that heard about the requirements from another business that attended a seminar. It is impossible to document improvement in compliance without the resources to perform site audits before and after outreach projects.</p>
Massachusetts	<p>Making a correlation between those companies that received on-site visits and the increased degree of environmental understanding is easy. Now that we have some staff resources, this information will be tracked. It is not as easy to get the same level of confidence from companies with whom the only contact is a workshop or phone conversation. We are looking for improved tracking mechanisms to put in place this year to show a significant improvement in 1996.</p>
Michigan	<p>The Environmental Assistance Division (EAD), which houses the MI Clean Air Assistance Program (CAAP), also has an Environmental Assistance Center (EAC). EAC provides a single point of access for inquiries related to environmental issues. The availability of EAC to the CAAP, the development of guidance publications, and the delivery of workshops by the CAAP has resulted in a better working relationship between EAD, the regulatory agency (MI Air Quality Division), and the regulated community. For example, there is more professionalism and respect by all, and this relationship has helped to eliminate such government stereotypes as the "typical, uncaring, bureaucratic" or a preconceived stereotype of industry as having a "lack of concern for (the state's) natural resources."</p>

**TABLE G-2
(Continued)**

Minnesota	Many businesses calling the program for help. Awareness that assistance is available and is being used and appreciated. Many stating that they now have awareness and general understanding of environmental responsibility. Many have now applied for permits. Many are now in compliance with NESHAPs and reports are coming in on time. From understanding the regulations due to SBAP assistance, many small businesses are changing processes, equipment, and materials to get out of permitting and/or NESHAPs.
Mississippi	No statistics available at this time.
Missouri	We have some anecdotal information in the form of individuals thanking us for the assistance provided. Sometimes this comes in the form of a "thank you" letter written directly to us or to others in the department with whom they are dealing. Other forms have come verbally from the individuals telling us how much they appreciated our assistance or when they refer other businesses to us. We currently are working on a method to track these activities, however, we presently do not have our database structured to include this information.
Montana	<p>The most notable improvements in compliance have been a result in on-site visits. Many of the businesses visited by the SBAP were not aware of regulations or pollution prevention opportunities and were eager to be given a chance to comply without the threat of enforcement action.</p> <p>Seminars and publications have proven to be less valuable than site visits. SBAP found it more difficult to establish relationships with small businesses through these tools than with direct personal contact. This is especially important in a state where many small business owners are independent-minded and distrustful of government.</p> <p>The toll-free hotline is a tool that has worked very well for SBAP. Much of the initial contact between the SBAP and small business owners is initiated at this level. SBAP often makes telephone contact several times with a small business before it is invited to make a site visit.</p>
Nebraska	A stronger understanding of the need to control emissions, development of better bookkeeping methods, and more willing to allow P2 opportunities to be discussed.
Nevada	N/A
New Hampshire	Businesses have been very supportive of the non-regulatory nature of the program. The ability to talk to someone who has a full understanding of regulations and can assist in compliance is constantly mentioned. Once explained, regulatory requirements are usually complied with in a reasonable time frame. The animosity created through enforcement is eliminated, which has improved communication dramatically.
New Jersey	No response.

TABLE G-2
(Continued)

New Mexico	Small businesses have a better understanding of the air quality regulations that apply to them, and the technical support provided by the SBAP has improved the attitude of some business persons about complying with the regulations. Pollution prevention information has helped small business reduce pollution and save money. As a result of our assistance, six businesses were able to identify potential pollution problems in other media and seek help. SBAP also gave presentations to the employees of small business, and their improved understanding of regulations and how P2 reduces their personal exposure to air toxics resulted in positive behavioral changes.
Bernalillo Cty.	The regulated business community that has contact with the SBAP has a much better understanding of the air issues affecting businesses and therefore more interest in the regulations that affect them. There has been an increase in the registration/permitting of existing sources within Albuquerque/Bernalillo County.
New York	<p>SBTCP notifies and explains to small businesses the requirements. For example, (1) need to have operating permits (businesses previously without permits are applying for permits); (2) need to maintain records to verify the facility's compliance status; (3) explains available compliance options such as capping, reformulation, control equipment, and P2 -- businesses making informed choices; (4) need to maintain updated information because of ever-changing requirements; (5) serves as advocate of small business interest -- businesses being helped through government maze and serves as voice of businesses in rulemaking, etc.</p> <p>Word-of-mouth recommendations -- business-to-business that SBTCP is a source of information that is knowledgeable, approachable, able to cut through maze of bureaucracy, and trustworthy.</p> <p>SBTCP helps small businesses understand what the requirements are and how they apply to their operations/facilities and what methods or alternatives are available to achieve voluntary compliance. Companies understand that they must look at their facility holistically to work toward achieving compliance.</p> <p>SBTCP plays an important role in helping regulator to understand the value and needs for compliance assistance in conjunction with an enforcement element rather than solely an enforcement/penalties approach to achieving compliance. SBTCP serves to enlighten the regulatory group's negative way of thinking about businesses, that not all businesses are "bad guys wanting to pull something over on them." Contrary to the expectations of many regulators, SBTCP's experience is that most businesses are willing to voluntarily comply with requirements so long as they are aware what the requirements are, how the requirements apply to them, and receive compliance assistance.</p>
North Carolina	Improvements in understanding has resulted from small businesses learning what is required and how to complete forms. The confidential policy of this office has encouraged businesses to ask if they need a permit or what requirements apply. As businesses find out what is expected of them, their compliance increases. Record keeping still is a great burden for small businesses. Simplifying the requirements and simple explanation of the requirements is the biggest boost to compliance.

TABLE G-2
(Continued)

North Dakota	<p>It is difficult to assess environmental improvement or compliance improvement that may have resulted from the SBO or SBAP assistance. However, any assistance provided surely make it easier for business to comply, and that was the primary intent of Congress in mandating the states to establish SBTCPs.</p> <p>With regard to dry cleaners, the state has a 95% success rate in receiving initial reports from regulated sources. This success rate can be directly attributed to the SBAP.</p>
Ohio	<p>From the perspective of SBO, the most important advance is an increase in the number of businesses willing to ask for help. Although the number is still small, it is building a clear track record for the program.</p> <p>SBAP experience has been exceedingly positive in relation to its on-site visits. The opportunity for a business to have "an inspector's eyes" visit the plant or shop without fear of penalty has resulted in businesses acting quickly to resolve any problems there may be.</p> <p>It is important to stress that businesses are asking for help because they want to be in compliance with environmental regulations, but have been afraid to look closely for fear of what they might find. This fear is very rarely based upon actual personal bad experiences with the regulating agency; more often, it is based on "industry legend" stories about what happened to a similar operation. The businesses visited to date are pleasantly surprised that they have stumbled upon a government program that can be of immediate and direct benefit to them.</p>
Oklahoma	<p>We have not formally tracked this. However, from the feedback that we have received on various fronts, there has been a change in the perception of our Agency's willingness to provide assistance as a means to achieving compliance - and that it works!</p>
Oregon	<p>There is a greater awareness of costs associated with discharging pollutants to the environment in some industrial sectors. Several small businesses have replaced solvent cleaning (e.g., vapor degreasers) with aqueous cleaning systems. There is a growing awareness of liabilities associated with improper waste management and costs associated with less efficient technologies. A dry cleaning business converted to a citrus cleaning technology. Another converted from perc cleaning to a new dry-to-dry machine that uses Exxon-2000 cleaning solvent. Several wood surface coaters have converted to water-based coatings. Powder coating systems are becoming more prevalent to avoid MACT, GACT, and worker safety regulations.</p>
Pennsylvania	<p>No response.</p>
Puerto Rico	<p>Distrust in SBAP because of the link we have with the regulatory office.</p>
Rhode Island	<p>Overall outreach, communication, and availability of SBO and technical assistance services are having a positive impact on behavior and environmental compliance.</p>
South Carolina	<p>Reduced fear and suspicion of outreach efforts. Increased compliance by previously unpermitted sources.</p>
South Dakota	<p>The department's technical assistance activities have helped small businesses understand and comply with new federal requirements.</p>

**TABLE G-2
(Continued)**

Tennessee	<p>Program assistance has resulted in 75 + % regulatory response compliance rate for new MACT standard-impacted companies. Program evaluations indicated workshop participants had a greater understanding of regulations. Businesses have expressed interests in ensuring compliance in all areas of their businesses that may impact the environment.</p>
Texas	<p>Compliance visits resulted in the following increase in complying with regulations.</p> <ul style="list-style-type: none"> • Spray booths: 3% increase (from 90% to 93%) • Gun cleaners: 6% increase (from 82% to 88%) • HVLP guns: 5% increase (from 92% to 97%) • Prep areas: 14% increase (from 73% to 87%) • Low VOC solvents and paints: 32% increase (from 36% to 68%) • Stack: 31% increase (from 62% to 93%) <p>Compliance was measured at the beginning of the site visit using checklists, and compliance again was measured after the visit.</p> <p>SBAP reached 1,792 dry cleaners. Of this, 95%, or 1,697 sent their registration forms to EPA.</p> <p>TNRCC received 831 Standard Exemption 124 registration forms.</p>
Utah	<p>Businesses are often responsive once they believe they are safe and supported. The addition of VAP on-site evaluations has added a new level of interest and responsiveness. It seems that if a business has a positive experience with such a service, they are more eager to provide encouragement for other businesses. The VAP services have been a valuable extension of SBAP service, where initial participation in VAP services was through SBAP referrals. Obviously on-site support provides a great deal of awareness and understanding of the reasoning and methods for regulatory compliance. Businesses are also becoming increasingly interested in P2 opportunities -- especially the benefits of reduced emissions, costs, and regulatory requirements.</p> <p>The Amnesty Program provided a great "window of opportunity" for many businesses. Additionally, many businesses discovered that, although they did not require permits at current operating levels, future modifications may require the need for a permit and that they might incorporate P2 techniques in existing processes to avoid greater regulatory costs in the future.</p> <p>The establishment of the Small Business Advisory Committee was a major highlight in providing a forum for exploring opportunities to improve relations and create a positive influence in the business community. The Committee's energy and enthusiasm has been most refreshing and insightful and has built a stronger foundation for trust between government and industry.</p>
Vermont	No response.

**TABLE G-2
(Continued)**

Virginia	<p>There is definitely a relationship of compliance assistance activity to the awareness of the regulated or newly regulated community. We saw with the dry cleaners in 1994 that their acceptance of responsibility to comply with regulation was a direct result of their understanding of the requirements, the costs, the benefits of compliance, and the fact there was a willing party (SBAP) to provide information and assistance. The initial results of the June 18, 1994 deadline for initial notification reports was met by 73% of the state's dry cleaners. Cooperation between the state and interested trade associations was a great benefit in ensuring wide coverage approaching 200 facilities. The outgrowth of the workshop activity yielded months in which telephone assistance approached 100 calls per month for a short period.</p> <p>A large part of the success of any outreach assistance are the materials used and delivery of the message, which have to be geared to the audience. With the dry cleaners, EPA's efforts with language was a great help. Development of very basic grade level materials also helped make the job easier. Finally, the necessity to reach understanding and parity between the compliance/enforcement activities and the SBAP is crucial to assuring the small business that the end result is compliance and improvement of the environment.</p> <p>Regulations geared toward a less defined universe such as the halogenated solvent MACT are less likely to achieve the same results. Identification of the source universe becomes a major problem, and communication becomes difficult because of physical resources of the SBAP to provide coverage to a potential universe in the 1,000s. However, any success breeds success and more activity. Thus, the credibility of the SBAP and the ability to use the 507 Enforcement Policy is critical to the continuing success of the compliance assistance activity.</p>
Virgin Islands	No response.
Washington	Better understanding of regulations and multi-media interactions. Improvement in P2 oriented management practices. More open communication between sources and agency.
West Virginia	Region III inspection of dry cleaners in WV has detected no significant deficiencies in complying with MACT requirements. WV chrome electroplaters achieved a high compliance level for initial notification to Region III. The overwhelming majority of businesses we have worked with are cooperative and seem willing to address air quality issues, but need guidance on requirements and practical methods of compliance. However, because of the many other business demands, companies often need more than a one-time assistance effort. Follow-up and routine reminders help ensure that the business actually accomplished the objectives. This level of monitoring is time-intensive, but should be continued until the specific goal is achieved or it becomes clear that the business is not sincere in complying with requirements.
Wisconsin	As a result of WI's SBO and SBAP technical assistance activities, we have seen more businesses submit initial notifications to DNR than we would have expected without our outreach efforts. The level of understanding by individual businesses seems to be increasing. We have seen an increase in the number of calls for assistance over the last year. Inquiries are getting more focused. Rather than just knowing whether a regulation affects them, businesses want to know how to comply. Small business is better informed by our program, because outreach efforts are reaching them, and our materials and presentations are clear and understandable.

TABLE G-2
(Continued)

Wyoming	No objective information or data are available to evaluate any improvements made in compliance by small businesses, although a number of businesses have orally expressed their appreciation for the assistance provided by SBAP. However, communication is being established between the SBAP and various businesses that can only lead to an improvement in compliance. Small businesses are under a heavy burden of federal and state requirements, and a knowledgeable SBAP can make appropriate referrals while improving the relationship.
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TABLE G-3
RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA

RECOMMENDATION	
Program	Institute Multi-Media Pollution Control Efforts
AZ	<p>Adopt an industry-specific multi-media approach to regulation and compliance assistance. Regulate business by industry sector, not media ("one-stop shopping") and not by revising individual acts (i.e., CAA, CWA, SDWA).</p> <p>Mandate with appropriate funding true multi-media compliance assistance programs.</p> <p>Consolidate all environmental reporting and recordkeeping into a single form with an electronic format, due annually and available to all agencies.</p>
AR	Expanding the focus of small business assistance to all media is necessary.
IA	Pass federal legislation to broaden the role of the SBO to encompass all forms of pollution.
KY	Funding should be made available to provide multi-media assistance to small businesses.
MN	Many small businesses (especially industry or sector groups) would benefit from a multi-media industry-specific assistance and compliance initiatives (assistance, inspections, reports, fees, P2, etc.).
NE	Make the SBAPs multi-media.
NH	Should work to have programs multi-media through legislation with appropriate funding mechanisms. Most businesses appreciate "full service" for environmental compliance assistance.
NY	Make outreach and assistance multi-media. More than air regulations need to be addressed by small businesses, and they need help complying with all environmental regulations.
NC	Environmental information and assistance should be multi-media. Small businesses find it difficult to understand why they need to deal with multiple agencies.
ND	Allow states to use their funding in multi-media pollution control assistance and not restrict use of funding to solely air pollution control assistance.
SC	Multi-media efforts would allow compliance assistance with overlapping regulations.

TABLE G-3
(Continued)

RECOMMENDATION	
UT	Many small businesses that seek SBTCP assistance request multi-media support and assistance. Utah's SBAP receives numerous requests to establish a "one-stop" regulatory assistance center.
VT	The existing Air Pollution Control Division adequately addresses small business needs regarding air pollution issues. Vermont needs one office where small business owners/operators can call for assistance with all types of pollution problems. This office could serve as a "one-stop" information warehouse. Problems deemed unsolvable at this level could be directed to the appropriate division in the Department of Environmental Conservation.
WI	SBTCPs should have multi-media authority, not just for the CAA, but for CWA, RCRA, and CERCLA as well. Many small businesses have remediation and other types of problems for which they need assistance.
Increase / Ensure Adequate Funding for All Small Business Assistance Programs	
DC	Increased funding.
IA	Ensure continued adequate funding for small business technical assistance programs. Funding of the SBO needs to be guaranteed.
LA	The problem of financial assistance for the Small Business Assistance Group needs to be addressed Fund the appointment by EPA of a full-time technical director responsible to the state technical groups, since small businesses emit over half of the air pollutants in the U.S.
MD	Give more resources to the federal SBAP instead of the SBO.
MA	No federal or state funds have been received for SBAP operations, although this funding was established in the 11/92 SIP revisions. At the federal level, it would be helpful to have a memo specifically dealing with funding SBAP activities circulated to the regions and states. It should indicate unequivocally the source of SBAP funding and perhaps link it to other operational funds provided to states for implementation of Title V activities.
NE	Provide federal funds to allow a local EPA representative in each state.
NH	Increase direct funding to state programs for increased on-site assistance efforts.
	Maintain funding for national MACT satellite conferences for new MACT standards.

**TABLE G-3
(Continued)**

RECOMMENDATION	
OH	<p>State programs could benefit from federal funds to support this federally mandated activity. It is particularly problematic that the mandated revenue source (Title V permit fees) are paid by businesses that are excluded from receiving assistance.</p> <p>EPA assistance for the SBO and other technical assistance has been excellent to date. However, it is clear that lack of adequate funding for this effort has placed restraints on EPA's ability to provide timely and adequate assistance to 50 + state programs.</p> <p>Increase grant funding to undertake R & D and the development of technical resources.</p>
TN	Provide a meaningful direct appropriation to the EPA Small Business Ombudsman to be shared with state SBTCPs for outreach activities and education on behalf of small business voluntary compliance initiatives.
WI	Provide more funding for the EPA Ombudsman's Office. The staff is too small to participate in a multi-media approach. This could also be fully delegated to the states, thereby reducing the need for more funding.
Utilize the Internet and Other Electronic Resources for Information Exchange	
CO	Encourage EPA to add additional information on the internet.
DC	Electronic media.
NM	Create and maintain a home page on the internet by the Small Business Ombudsmen's Office so that states can electronically share documents such as newsletters, brochures, and other publications.
NY	SBTCP should make information available on the internet.
OR	Work with state SBAP's to develop an easy-to-use electronic technical assistance tracking database.
Expand National Advertising to Increase Program Exposure	
IL	Expanded national media advertising campaigns produced at the federal level.
IA	The federal level needs to expand its national media efforts/campaign.

**TABLE G-3
(Continued)**

RECOMMENDATION	
Provide / Facilitate Acquisition of Generic Outreach and Training Materials	
CA	Provide free downlink locations for participating in training.
IA	Develop campaigns at the federal level in several media that can be used by state SBOs.
MI	Provide grant money to state SBTCPs to develop and utilize innovative ways to distribute 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 a SBTCP to work with federal and state government, business and industry, and statewide educational institutions to coordinate and package environmental compliance and pollution prevention information that is specific to industry sectors. The information could be introduced to students at the secondary or post-secondary level so that by the time he/she enters the workforce, he/she will bring timely, relevant, and useful knowledge/experience to specific industry and business.
NV	Expand the services of the national clearinghouse for SBAP information and activities.
NY	Industry sector guidebooks on environmental compliance should be made available.
OR	The EPA-sponsored national teleconferences through the University of Tennessee were a cost effective means of information transfer. Similar training related to other industry sectors (printing, furniture coating,) is needed. Develop 30-minute training videos. Offer a national teleconference on small business cross-media pollution prevention. Offer a national teleconference on small business environmental auditing for SBAPs, CAPs, environmental consultants, and small business. Develop a small business environmental cost accounting course.
RI	Additional outreach and training materials, for example, industry-specific fact sheets.
WA	EPA can best be of assistance to SBTCPs by providing generic outreach and training materials, e.g., funding MACT-related video conferences and related manuals. SBAP and local agencies are best suited to coordinating distribution of outreach tailored to emphasize state/local concerns and integrate with other media issues (i.e. hazardous waste and water quality).
WI	Provide case studies illustrating an actual achievement of compliance for minimal cost via pollution prevention and waste minimization efforts.

**TABLE G-3
(Continued)**

RECOMMENDATION	
Establish Mechanisms to Finance Environmental Compliance Equipment	
IN	Establish a compliance assistance grants program similar to that of the pollution prevention grants program.
MI	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 modifications of current facility processes and control equipment to reduce air emissions.
MN	Seek more financial assistance funding and/or tax incentives/exemptions for small businesses who are making process or equipment changes that will demonstrate environmental improvement.
MS	A federal grant program for small businesses to purchase control equipment or services in complying with the CAAA would be a great asset for small business.
MT	Provide federal funds to state SBAPs to start revolving loan programs for small business environmental problems.
NV	Establish a revolving loan program similar to the program started in the 1980s for small wastewater treatment plants (State Revolving Fund-SRF).
NM	National loan program for small businesses to help purchase new pollution control or pollution prevention equipment.
NY	Provide a mechanism for small businesses to finance environmental compliance equipment.
OH	Additional federal financing assistance would be important, either in the form of funds available for loan and grant programs or in the form of tax incentives targeted at small business Clean Air Act compliance (tax credits, earmarked deductions, or tax exempt financing).
OR	Institute a national revolving fund to finance small business compliance and technology conversion projects.
UT	The creation of low interest revolving loan programs would greatly enhance CAAA compliance and SBTCP services.
VA	Creation of a revolving loan fund by the SBA for small business compliance assistance.
Expand / Facilitate Effective Communication Between State and Federal Agencies	
DC	Effective cooperation.

TABLE G-3
(Continued)

RECOMMENDATION	
IA	Continue and expand communication between states and federal agencies that address specific CAAA compliance obligations.
LA	Improve/initiate technical guidance and communication from the technical arm of EPA, not just the Ombudsmen's office.
TX	Develop formal process for input from SBAPs on proposed EPA policies/rules. Also provide an opportunity to gather information from network of small businesses throughout the U.S.
UT	The small business services and exchange of state information and federal regulatory updates are crucial for providing effective services and timely information and support. Information packets provided by the national SBO office, peer exchanges, conferences, workshops, and phone contacts are vital to provide local assistance. These efforts are cost effective in avoiding duplication and research time and should be continued and expanded.
WA	A major effort by the state Ombudsman to communicate with EPA's Office of Enforcement and Compliance Assurance in support of the proposed Automotive Service and Repair Compliance Center to be located in Kansas City has been "rebuffed." It would appear that EPA efforts will, in fact, be duplicating local/state activities and causing confusion for automotive small business owners.
Allow Flexibility in Rules Applying to Small Business	
CA	Explore ways under Title V implementation to minimize burdens on small business.
CO	Remove the "once in, always, in" requirement in the MACT program. (Note: A source can move in and out of Title V, but unless it gets out of the MACT in time, it will always be subject.)
KS	Federal requirements should reflect whether or not a state has any nonattainment areas.
ME	Shift the emphasis of CAAA from pollution regulation to pollution prevention. Focus assistance efforts on getting businesses out of the regulatory loop by reducing their emission levels below regulatory thresholds.
MD	Reduce the requirements/inflexibility of the CAAA so that states can more easily prove that they require equivalent environmental protection and so exempt their small businesses from duplicate or more prescriptive efforts.

TABLE G-3
(Continued)

RECOMMENDATION	
MN	<p>Simplify regulations for small business -- "one size fits all" does not work in this case.</p> <p>More simply defined levels of "insignificant activities" and "exemption" status are required.</p> <p>Set industry sector/size goals and phase them in over a period of time. Small businesses often lack the financial ability to make major changes quickly.</p>
NE	<p>Eliminate the "potential to emit" calculations ,and allow small businesses to use actual emission data from the source to be regulated.</p> <p>Provide a bottom line of actual emissions at which a source does not have to provide a report.</p>
NH	<p>Increase use of general permits and standard exemptions for small sources.</p>
NY	<p>State and federal governments should be more flexible with regulatory requirements as they are applied to small business sources. This would reduce the regulatory burden yet result in no impact on environmental or human health. For example, the VOC RACT requirements in New York State have no applicability threshold for sources located in the NY metropolitan area, but control options included in the regulations were developed based on control options available to major facilities. The CTGs evaluated major sources when the control options were established, and these control strategies were never intended for minor sources.</p> <p>Examine streamlining procedures for variances.</p>
NC	<p>Change the definition of potential to emit to reflect a reasonable number based on a factor of 2 or 3 times actual emission.</p> <p>Modify the EPA enforcement policy to allow small major sources to reduce emissions below major thresholds to become "small non-major" sources.</p> <p>Simplify requirements and reduce the paperwork. It is still difficult for a small business to be certain that all applicable requirements are met.</p> <p>Raise the permit threshold above the 5 tons per year exemption level presently in use in North Carolina. Ten tons per year seems reasonable since this is the threshold used for a HAP.</p>
ND	<p>Allow states flexibility in administering rules and policies they adopt which are intended to assist small business (e.g. different versions of amnesty that result in compliance).</p>

**TABLE G-3
(Continued)**

RECOMMENDATION	
OH	There continues to be an inherent conflict in EPA's policy of forcing states to choose between offering confidentiality and offering flexibility on enforcement action. Although the current position represents a step forward for EPA, it would be more productive to allow states to develop their own "mix" of tools required to carry out the job.
OK	Eliminate potential to emit as a defining criteria for applicability to Part 63 NESHAPs. Base it upon actual emissions.
	Do not require Sec. 112 sources, regardless of size, to obtain a Title V permit.
SC	Do not require small businesses to obtain a Title V permit if subject only to new MACT standards and are not otherwise a major source. Allow small businesses to calculate emissions based on actual and not potential if adequate control equipment or devices are in place. Continue to require notification for modifications to processes, but not for new construction permits if changes do not exceed permitted emission limits (Plant-wide Applicability Limits). a major source otherwise. Allow more exemptions to the P.E. certification requirements for construction applications.
SD	The federal government should give states as much flexibility as possible to help small businesses comply with the CAAA.
WI	The EPA's enforcement policy should not lead from command and control-driven regulations, but should provide for economically-driven enforcement with flexibility to allow the regulated community to solve their own problems using innovative and cost-effective approaches. Permitting should be based solely on performance and the specific environmental discharge standards that the facility must meet.
Avoid Duplication of Effort in Compliance Assistance Activities	
ID	Instead of creating compliance centers throughout the U.S., channel that money to state programs where it can be used by everyone. These compliance centers are a duplication of effort, waste of increasingly limited resources, and an irresponsible action on the part of the EPA.
IA	Assess the need to establish national compliance assistance centers based on the existence of a clearly defined client base that cannot reasonably access equivalent services elsewhere. Optimize spending by funding existing programs instead of creating new ones.

TABLE G-3
(Continued)

RECOMMENDATION	
ND	Ensure that the proposed federal compliance assistance centers do not duplicate the efforts of the state SBTCPs. If the centers are established, one role of the center that may be helpful to states would be to serve as a clearinghouse for documents.
WA	The SBAP and related activities should be coordinated at the federal level to avoid internal duplication of effort and competition for funds. A specific focus of this coordination effort should be the four Compliance Office technical centers.
WI	Ensure that federal programs do not duplicate efforts at the state level.
OECA Compliance Incentive Policy	
MA	Additional guidance is needed to enable implementation of the OECA Compliance Incentive Policy. In some cases, getting the state to implement the policy would be facilitated by clear, step-by-step guidance on state implementation.s, getting the state to implement the policy would be facilitated by clear, step-by-step guidance on state implementation.
WI	The EPA Interim Policy on Compliance Incentives for Small Business is an "inferior policy." It lacks immunity from penalties for those who audit, remedy violations, and report voluntarily. It also creates uncertainty and obstruction regarding voluntary corporate disclosure of violations. Further, this policy will increase the liability of those who perform environmental audits, voluntarily report violations, and provide timely remedies. A congressional fix may be necessary in the spirit of meaningful self-regulation.
Other	
AR	Small business assistance must become a component of all regulatory activities - not some separate and competing activity.
	Pollution prevention must be integrated with small business assistance.
CO	Transfer resources now being used for Federal Assistance Centers to Federal SBO/SBAP programs. Allow state SBAPs/SBOs to operate with unconditional confidentiality in regards to discovered violations (except for imminent public endangerment).
FL	The Ombudsman would like federal regulations requiring the state to enact legislation providing confidentiality in all SBAP transactions.

TABLE G-3
(Continued)

RECOMMENDATION	
IN	Get the rules out to affected businesses by means other than the Federal and State Registers. Utilize newsletters, trade associations, etc. Offer compliance assistance on a confidential basis.
KS	The requirement for a CAP should be the state's option.
MN	Regulation development needs to include more small businesses and involve people from across the country. Rule writers at EPA should personally visit more small businesses. Write rules in real "plain English." Re-evaluate recordkeeping/reporting requirements, keeping them simple. Avoid collecting data that does not demonstrate compliance.
MT	Provide federal funding to state SBAPs for regional technical training. It would be advantageous for SBAPs to help sponsor regional training sessions where staff would receive detailed, industry-specific training on MACT issues. The sessions should involve hands-on training on industrial processes, pollution prevention, and control equipment.
NH	Allow of increased recycling of used auto refrigerant and catalytic converters without excessive reprocessing.
NM	Increase regional participation in MACT development.
NY	Regulatory agencies at the state and federal level should institute informational outreach to environmental consultants. Numerous consultants are contacting SBTCP for information about regulatory requirements because they have difficulty accessing the regulators. SBTCPs could arrange to provide consultant services to small businesses at a reduced rate. Direct assistance is provided small business by the SBTCP and consultants. Therefore, the states should develop a mechanism to provide accurate and timely advice to their clients. This should result in a higher rate of compliance. The state and federal government should develop formalized training for those providing permitting assistance. State and federal regulatory agencies should provide outreach to those affected by their requirements (not just SBTCP).
OH	Larger quantities of EPA brochures on new MACT standards and EPA-developed software for calculating source emissions would be helpful.

TABLE G-3
(Continued)

RECOMMENDATION	
OR	<p>The greatest obstacle to meeting all the requirements of the Clean Air Act is the lack of resources. The state SBAPs need training, financial, and support assistance.</p> <p>Work with state SBAPs to institute a national small business mentor program.</p> <p>Work with state SBAPs to develop a national green sticker program (e.g. simplified ISO project).</p>
PA	Maintain a high level of enforcement against companies that wilfully violate regulations. Otherwise, companies will continue to avoid detection or refrain from complying with the regulations.
PR	Provide guidelines and recommendations for each state to assist Puerto Rico in developing its program.
TN	<p>Maintain the SBAP requirement in Section 507 of the Act.</p> <p>Modify the present statutory provisions by elevating the EPA Small Business Ombudsman to the Office of the Administrator.</p> <p>Abolish "continuous emission monitoring" provisions that would be better left to state regulatory authorities.</p> <p>Ensure a sufficient time frame from publication of a new rule and the compliance date(s).</p>
TX	Concerted effort to ensure that grants for small business assistance are coordinated with state SBAP/SBO to provide for maximum leverage of resources.
UT	Training sessions that provide a step-by-step approach to conducting on-site evaluations, along with sample forms, pollution prevention materials, industry-specific information, and mock site visits would be of great benefit in increasing effectiveness of reviews, as well as providing a training program for volunteer site evaluators.
	Continued coordination with P2 programs and services would be most helpful, along with providing additional support in research and information of services and improved team efforts.
	Increase training and networking opportunities with CAP peers and integrate training sessions with SBO/SBAPs to allow for greater understanding of services and improved team efforts.
VA	More comprehensive impact analysis of regulations affecting small businesses. Is the gain in emission reduction worth the price which will have to be paid?

TABLE G-3
(Continued)

RECOMMENDATION	
WV	There should be a mechanism to reduce the minimum composition for small state programs. While it is desirable to have a variety of interests represented, it is inefficient to oversee the activities of three people with a seven-person panel. We suggest consideration of a five-member panel for small states, perhaps reducing duplication of members representing the same constituency (e.g. one member representing the general public rather than two, and three members representing small business rather than four).
WI	<p>EPA should insist that all other regions become equally active in order to maintain a uniform CAP policy throughout the U.S.</p> <p>EPA should recognize, by a policy statement(s), that industry is basically in environmental compliance without a large number of recalcitrants. Industry owners are responsible adults with an acquired (over the years) environmental consciousness supported by a well-established irreversible public environmental ethic.</p> <p>To be fully effective, CAP staff need training in negotiated rule making and conflict resolution. Abbreviated training could be arranged through existing seminars at Harvard and M.I.T.</p> <p>The Wisconsin Small Business Environmental Council strongly supports the formation of a national (non-profit) Small Business Assistance Coalition/Trade Association.</p>

No recommendations reported: AL, AK, CT, DE, GA, HI, MO, NJ, WY.

TABLE G-4
CONFLICT OF INTEREST/CONFIDENTIALITY ISSUES

In Table G-4, the SBTCPs describe how their programs address internal or external conflicts of interest (COI) or perception that this program may not be confidential. (Comments edited for space.)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Alabama	To maintain confidentiality, businesses can work through Ombudsman's office, which is placed under the Director of the AL Department of Environmental Management and not under any regulatory divisions. When SBO staff receive a call for information and goes to the regulatory divisions for answers, it is understood that the source of these questions is to be kept confidential unless there is an imminent threat to public health or the environment.
Alaska	Small Business Air Program is located in the Compliance Assistance Section of the Statewide Public Services Division. The section is a non-enforcement unit without authority for taking enforcement actions. The section was specifically set up to provide assistance to businesses and pollution prevention services without enforcement authority. Alaska has a strong open records law, and as such, the documents and information contained in the SBAP are open to the public and to other sections of the department. However, there are no efforts on the part of the SBAP to notify enforcement entities in the department of issues arriving from SBAP actions, with exception of those involving immediate threats to public health or the environment.
<p>Arizona</p> <p>Pinal Cty.</p> <p>Maricopa Cty.</p> <p>Pima Cty. & Tucson</p>	<p>SBAP moved out of Air Quality regulatory program and housed under Director's Office of Customer Service and External Affairs (separate physical buildings in close proximity). Agency policies developed regarding Confidentiality of Information and the relationship between SBAP and Compliance & Enforcement activities within the Agency.</p> <p>To the extent that our assistance activities have revealed non-compliance, we have initiated vigorous enforcement action where the non-compliance has caused a meaningful risk to human health. In other cases, we have simply exercised enforcement discretion. (In all candor, we have encountered NO revelations of non-compliance that could be characterized as creating a meaningful endangerment of human health.)</p> <p>Although Maricopa County SBEAP is housed in the same department as enforcement and compliance groups, there have been no instances where confidentiality or a conflict of interest have been brought into question. We remain very sensitive to that perception, and have increased communication between the SBEAP and enforcement groups so we can be aware of any planned or pending action against a company prior to providing assistance. A formal confidentiality policy is currently being developed and should be in place in the first quarter of 1996.</p> <p>Business Assistance personnel are forbidden by the director to inform other department personnel of situations, practices, equipment, etc. at a particular facility that could lead to enforcement action unless the observed practice poses an imminent and immediate threat to public health or the environment. Department personnel respect this confidentiality. The regulated community is apprised of this policy, but only place confidence in it after dealing one-on-one with Business Assistance staff. Bottom line: Over time, business persons benefit from the assistance program and communicate to others that they were not burned by the department. Grass roots marketing and sincere staff are what make the program work in Pima County.</p>
Arkansas	Confidentiality has not posed a problem in AR. The SBAP has used multi-media inspection teams from the regulatory divisions to achieve voluntary compliance. SBAP has been able to offer permit extensions and waivers to small businesses to allow reasonable periods for achieving compliance.
California	Ombudsman's office is part of the Air Resources Board Chairman's Office and no COI or confidentiality issues have arisen yet.
Colorado	CO doesn't have a formal policy on how to handle the issue of confidentiality.

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Connecticut	<p>CT's program does not offer confidentiality and probably never will. The State has liberal Freedom of Information Act that provides for only a few limited exceptions to the general policy of disclosing governmental documents. CT's program works closely with other service providers, some of which do offer confidentiality. In situations where confidentiality is an issue, the SBTCP refers clients to programs within the state that do offer confidentiality. These organizations include CT Department of Economic Development (CTDED) and CT Technical Assistance Program (ConnTAP). Until recently, the Air Bureau funded two staff positions at the CTDED to offer small businesses a confidentiality option. The CTDED positions were funded under an Memorandum of Understanding, which has expired.</p> <p>The SBTCP is working to establish a policy/protocol with the Air Bureau's Enforcement Division to provide some level of <i>predictability for small businesses seeking assistance</i>. This policy/protocol likely will take the form of a Compliance Assistance Agreement that provides for delivery of technical assistance as part of the Air Bureau's Enforcement Response Policy.</p> <p>CT's Regulations of Connecticut State Agencies (RSCA) provide for confidentiality exceptions for company trade secrets.</p>
Delaware	<p>Not a problem to date. Program is structured to assure confidentiality to those requesting assistance from SBO/SBAP. Technical questions are referred to regulatory and engineering personnel by SBO, who is not compelled to reveal the source of the inquiry.</p>
District of Columbia	<p>Abide by 1995 Memorandum of Agreement delineating confidentiality policy by EPA's Assistant Administrator.</p>
Florida	<p>Program is organizationally isolated from the regulatory section within the Division of Air Resource Management.</p>
Georgia	<p>SBAP avoids discussion and review of confidential materials with compliance and enforcement personnel. In discussions, business names are not used, or circumstances are presented and assurances are secured before any sensitive materials are discussed.</p>
Hawaii	<p>No response.</p>
Idaho	<p>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.</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Illinois	<p>The Illinois EPA (IEPA) requested that the SBAP be housed in the Department of Commerce and Community Affairs (DCCA), which is the economic development agency for the state and was created in 1979. The SBAP is part of the Small Business Division within DCCA. This Division also includes the Small Business Development Center Network, which includes 53 Centers throughout IL that provide free counseling and business assistance.</p> <p>Having the SBAP at DCCA, a non-regulatory and small business assistance agency, removes the "fear factor" for small firms looking for assistance and information by not having to talk with the regulatory agency. SBAP staff rely on the IEPA for correct and timely information that can be communicated to small businesses.</p> <p>Although the SBAP does not provide on-site assessments, small businesses can obtain needed assistance. The Illinois Hazardous Waste Research and Information Center (part of the IL Department of Natural Resources, a non-regulatory agency) provides free assistance as needed. The SBAP created an Environmental Services Directory and Guide to Hiring an Environmental Consultant that small businesses may use to get on-site assistance. These two factors also allow for avoiding conflicts of interest and confidentiality for program clients.</p>
Indiana	<p>Most of the CTAP program, including all of the SBTAP, has been relocated to a separate building away from the rest of the regulatory programs within the Agency. The physical separation of the SBTAP minimizes the perception that our program is not confidential.</p> <p>Senate Enrolled Act 417 requires that information and documents of the CTAP/SBTAP be kept confidential. A policy has been drafted to carry out the confidential provision of the Act. The policy includes detail procedure that staff should follow to ensure that confidentiality is not breached.</p>
Iowa	<p>The Iowa Air Emissions Assistance Program (IAEAP) is located within the Iowa Waste Reduction Center (IWRC) at the University of Northern Iowa. The IWRC is not part, and operates independently, of the Iowa Department of Natural Resources (DNR). However, the IAEAP is funded by Title V fees through the DNR Air Quality Bureau (AQB). Contract terms require disclosures of the IAEAP client list to the DNR-AQB. The quarterly disclosure identifies client names and addresses, but does not include facility-specific information. The IAEAP informs clients that confidentiality does not exist.</p> <p>The IAEAP considers the disclosure list to be insignificant for two reasons: the vast majority of IAEAP clients must submit permit applications to DNR, which do contain detailed facility information; and to encourage voluntary compliance, the DNR does not target small businesses that are receiving assistance from the IAEAP.</p> <p>This system encourages small businesses to work with the IAEAP. The disclosure list provides a measure of insulation from DNR enforcement for actively working toward compliance with the IAEAP.</p>
Kansas	<p>SBAP is under contract, which states that specific information regarding businesses (such as name, specialty, specific nature of inquiry or other trade information) will not be reported to the regulatory agency; only numbers by type (SIC codes) are reported. The Ombudsman (Public Advocate) has the approval by the division director and bureau directors to keep information confidential. Confidentiality has not been an issue.</p>

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Kentucky	<p>KY SBTCP is based on independence from the regulatory program. SBO located in the Cabinet Secretary's Office. SBAP is offered through Center for Business Development outside state government. CAP members are appointed by Executive Order of the Governor. Legal issues concerning KY SBTCP have been reviewed extensively twice and discussed at two CAP meetings. Confidentiality is not an issue for the JCAPCD because the District approved a pilot amnesty program for small businesses on November 15, 1995. The pilot amnesty will be effective through the 1996 calendar year.</p>
Louisiana	<p>The following policy is published on the electronic bulletin board: "The Small Business Assistance Program (SBAP) personnel will not voluntarily reveal any environmental information received from a small business to any regulatory agency, except: 1) a criminal act has been committed, 2) the violation is a serious hazard to life or the environment, or 3) the company is a repeat violator."</p>
Maine	<p>The Department has adopted a "Small Business Compliance Incentives Policy" based on EPA's guidance dated June 1995.</p>
Maryland	<p>The SBAP conducted on-site assistance at only 10 businesses, and do not advertise this service. Therefore, since the program is not discovering instances of non-compliance, this has not been a major issue. The SBAP has an enforcement policy agreement with the Air and Radiation Management Administration. If businesses voluntarily come forth to get late permits through the SBAP, no fines are issued. However, if they are found in non-compliance by enforcement, the SBAP cannot help. No conflicts have arisen.</p>
Massachusetts	<p>With the passage of the Toxics Use Reduction (TUR) Act in 1989, OTA was created with a legislative guarantee of confidentiality to client companies. The only exception would be in the case of imminent threat to human health or the environment. In 6 years of operation, OTS has not been required to report a single company. The confidentiality of our clients has been demonstrated and after a slow beginning, the business community has come to accept this as valid.</p> <p>The OECA Compliance Incentive Policy would be an ideal opportunity for us to expand our repertoire of credible alternatives for clients. If we were able to utilize the Policy, we could then offer either confidentiality or the compliance window/penalty mitigation option. Companies could choose between the options according to their best interests.</p> <p>Conversations with the Acting Director, Chemical, Commercial, and Municipal Services Division of OECA indicated that no legislative enactment was required for the state to adopt the Policy. Since it was a policy rather than a regulation, it could be supported perhaps by an MOU between the Department of Environmental Protection (DEP) and OTA. Despite numerous attempts to get a supporting policy, we have not been able to achieve implementation of this policy. Efforts to implement this policy will continue.</p>

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Michigan	<p>External COI: Confidentiality is not an issue because the current services provided by the SBTCP are proactive. The SBAP is eluding the confidentiality issue by developing guidance publications, 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.</p> <p>The SBTCP will soon be developing a policy that explains how the program will respond when it becomes aware of a violation by a facility seeking assistance. The policy will also explain that information contained in the SBTCP files or databases will not be shared with the regulatory agency (Michigan Air Quality Division). At present, Michigan's SBTCP cannot claim that this information is "confidential" because state law (Michigan Freedom of Information Act) prohibits this claim.</p> <p>Internal COI: The SBTCP works closely with the regulatory agency, the Michigan 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 Clean Air Act. Michigan's SBAP acts as an education, outreach, and marketing arm for the state's air quality program and that role has assisted the SBAP in avoiding internal COI.</p>
Minnesota	MOU between SBCAP and Air Quality Division Enforcement Program signed April 6, 1995.
Mississippi	The Technical Assistance audits are handled outside DEQ by MISSTAP at Mississippi State University, allowing the SBTCP to use Option 2 of EPA's Enforcement Response Policy. The Ombudsman Office has been established within the DEQ with independence and confidentiality presented to and acknowledged by the Director and the Commission on Environmental Quality. We feel small businesses will trust this division of MSU to conduct the audits in a confidential manner.
Missouri	<p>Technical Assistance Program (TAP) does not share their files with any regulatory programs within the Division of Environmental Quality. When TAP requests information about a facility or type of process from a technical expert within a regulatory program, no information is provided that would allow the regulatory program to identify the facility in need of assistance.</p> <p>No issues have developed at this time.</p>
Montana	MT SBAP has been granted explicit authority from the MT Department of Environmental Quality to offer small businesses amnesty from enforcement measures provided that they make reasonable progress towards compliance with environmental regulations and are not presenting an immediate danger to public health, safety, and welfare. The issue of confidentiality soon will be detailed in a formal policy by the Department of Environmental Quality.
Nebraska	This is not an issue within the Nebraska Department of Environmental Quality mainly because the SBO, SBAP, Public Advocate, and Technical Assistance are all located in the Management Services section of DEQ and not under any Regulatory program. The SBO, Public Advocate, and Director of SBAP is one person. Coordination and confidentiality are not problems.
Nevada	Currently, there is no confidentiality or amnesty-type programs at NDEP and specifically at SBTCP. However, NDEP is working toward some resolution of this issue and should have it resolved by the next reporting cycle.
New Hampshire	Informal directive from DES Commissioner and Air Resources Director which implements OECA Policy. State law allows "audit privilege" for third party audits, which includes SBAP activities. Compliance assistance is a strong part of DES activities and is encouraged.

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
New Jersey	No response.
New Mexico (except Bernalillo County) Bernalillo County	<p>The SBAP offers an amnesty policy to qualifying small businesses in New Mexico. An agreement has been set up in the Environmental Department between the Air Pollution Control Bureau (APCB), which has enforcement responsibilities, and the Air Quality Bureau (AOB). SBAP provides qualifying small businesses relief from enforcement activities while the small business is making good faith efforts to meet air quality requirements. The SBAP will continue the amnesty status as long as the small business continues to work towards compliance with federal and state air quality regulations. A small business will not be eligible for amnesty for violations for which they were cited by the APCB before contacting the SBAP. The SBAP does not offer confidentiality.</p> <p>Expect development of an MOU and Amnesty program with Regulatory Section of Air Pollution Control Division in 1996. Currently, the SBAP provides a listing of small businesses receiving assistance to the Compliance Section that efforts are being made to comply with regulations. These businesses are those that have requested assistance through referral, outreach, or other city/state agencies.</p>
New York	The SBO and SBAP are located in non-regulatory agencies. Also, there is state legislation mandating confidentiality for both entities. The information is not subject to the Freedom of Information Law.
North Carolina	November 1993 the 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	<p>There are advantages and disadvantages to the organizational structure of the SBAP and SBO. As structured, the SBAP and SBO may not appear to be free of conflict of interest. Although the SBAPO staff are part of the permit section, which is separate from the compliance section, it is difficult to know whether small businesses may be reluctant to request assistance from the SBAP, since the SBAP staff are part of the air pollution control regulatory program. Also it is unknown whether small businesses are reluctant to request assistance or confide in the SBO, since the Ombudsman is housed within and employed by the Department of Health.</p> <p>The environmental programs of the Department's Environmental Health Section have traditionally been assistance and compliance oriented, with enforcement reserved for recalcitrant violators or where damage to health and/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. With the establishment of the SBAP and SBO, the fundamental approach to compliance hasn't changed noticeably. However, with the establishment of the SBAP and SBO, there has been more outreach activity advertising the Department's assistance-oriented philosophy.</p> <p>With respect to confidentiality, 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 SBAP staff is not turned over to the compliance program staff for enforcement purpose; however, it is expected that a plan for correcting any violations will be developed. When needed, compliance assistance will be provided from the SBAP</p> <p>It is the SBAP's and SBO's position that confidentiality (disclosure of violations to enforcement staff) is really a non-issue in North Dakota.</p>
Ohio	<p>Ohio General Assembly passed implementation legislation for the Small Business Assistance Program. These amendments to the Ohio Revised Code included a strict confidentiality protection as well as a provision that prohibits use of information gathered by SBAP in any OEPA enforcement action. Confidentiality has been emphasized and set in policy through a "Memorandum of Understanding" distributed by OEPA Division of Air Pollution Control to all OEPA and local air agency staff. The MOU specifies the confidentiality policy and instructs personnel to take it into account. SBAP cannot and does not report violations to enforcement personnel. The MOU follows USEPA's August 14, 1994 memo from S. Herman using the confidentiality option.</p>
Oklahoma	<p>SBAP is located in the DEQ's Customer Service Division, which is a non-regulatory part of the regulatory agency.</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Oregon	<p>Information disclosed and minor violations discovered from on-site small business technical assistance visits is protected by state statute except when there is reasonable cause to believe there is a clear and immediate danger to public health and safety or to the environment. In accordance with state statute and the confidentiality option set forth in EPA's Office of Enforcement and Compliance policy, SBAP adopted a Confidentiality Policy. In summary, the Policy requires the SBAP:</p> <ul style="list-style-type: none"> • to function independent of enforcement section • to restrict access to information and files of small businesses receiving assistance • to keep business names and locations in a separate confidential file • to perform follow-up consultations to assure resolutions of violations discovered during on-site visits. <p>This policy has not caused any conflicts of interest inside or outside the agency. To the contrary, it allows additional flexibility to bring small businesses into environmental compliance. For example, it allows SBAP to assist a small business that faces enforcement action through other channels by allowing staff to assist with P2, applying for permits, and mitigating penalties via supplemental environmental projects (SEPs). In such cases OR's SBAP Confidentiality Policy is compatible with EPA's "Interim Policy on Compliance Incentives for Small Businesses."</p>
Pennsylvania	<p>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 of the SBAP contract. This arrangement, to date, has avoided any problems with conflict of interest, and has provided a solution to the confidentiality issue.</p>
Puerto Rico	<p>We have a group of qualified consulting engineers which will provide the necessary assistance at lower cost when needed by small business. The source will make the necessary payments. Any assistance provided directly by EQB will be paid by Title V.</p>
Rhode Island	<p>RI DEM has been operating a non-regulatory P2 technical assistance program since 1987. Since that time, we have worked with more than 200 companies and have gained the trust of many more. As the RI SBAP develops, and prior to on-site compliance assistance, SBAP staff will enter into a memorandum of understanding with DEM's regulatory Division of Air Resources.</p>
South Carolina	<p>The SBTCP is located in Environmental Quality Control Administration within the regulatory agency. This separation from the Bureau of Air Quality has allowed us to offer confidentiality. We have encountered no problems with this arrangement.</p>
South Dakota	<p>South Dakota has a good working relationship with businesses. Individuals that write permits also conduct the inspection or facility audits. The goal of the department is to make sure all sources are in compliance with both state and federal requirements. As of yet, there have been no issues concerning COI.</p>
Tennessee	<p>Program is housed in non-regulatory division of department. Files are not shared. Company names are not provided to regulators unless company okay. Regulatory agency respects confidential nature of program.</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Texas	<p>In 1993, SBAP developed a Confidentiality Policy for small businesses that was adopted by the TNRCC Commission. SBAP operates under a multi-media TNRCC policy that provides for confidentiality from enforcement program of the agency. We work closely with the TNRCC Executive Office, Enforcement and Field Operations to ensure that all are aware of the Confidentiality Policy. The Enforcement Division now refers small businesses to our office for confidential assistance. Most printed materials developed by SBAP contain statements regarding confidentiality of information shared with SBAP. The confidentiality policy that started with the Air Program has been expanded to all media that TNRCC regulates.</p>
Utah	<p>Utah's SBO Office was originally established at the Department level. During the transition in hiring the new Ombudsman and the Voluntary Assistance Program (VAP) Coordinator [both confidential positions (VAP adheres to the state legislature's "Self Audit" confidentiality rule, which passed during the 1995 session)], the Division Director determined that a closer working relationship with the SBAP would be needed to ensure effective development of the on-site review program. The SBO Office was moved under the Division Director's Office during this "incubation" phase to establish solid VAP services and to allow for greater internal coordination.</p> <p>The move was presented to the Small Business Advisory Committee (SBAC) with no objection. A comment was made that basically "government wears the same hat at any level." However, a Committee member strongly encouraged that appropriate internal safeguards be taken to ensure confidentiality. Such provisions have been taken to ensure a confidential workspace.</p> <p>SBAP continues to operate under the "don't ask, don't tell" philosophy within the Division's Permit Section. A Division-wide confidentiality policy has been in the development stages through the Division's internal Small Business Coordinating Committee (SBCC) and should be completed spring 1996.</p>
Vermont	<p>Confidentiality issues have been a topic of discussion in the formulation of a Department-wide "multi-media" Small Business Assistance Program. The present plan is to offer on-site assistance with non-regulatory compliance specialists. The compliance specialists will sign an agreement not to provide information on compliance assistance visits to regulatory inspectors.</p>
Virginia	<p>DEQ has adopted EPA's Section 507 Enforcement Policy and is in the process of reviewing a MOU that would ensure confidentiality for the SBAP and the P2 Program from direct review by the enforcement division.</p> <p>The issue of confidentiality has not yet been a major problem, but will take on more importance as the SBAP moves further into voluntary complimentary compliance audits. 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. Also, it is worthy of note that Virginia's legislature passed both voluntary remediation and voluntary environmental assessment legislation last year, which provides an additional degree of relief to the business community.</p>
Virgin Islands	<p>No response.</p>

TABLE G-4
(Continued)

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Washington	<p>Revised Code of Washington, Chapter 70.94.034: "The department (of Ecology) shall establish a technical assistance unit within its air quality program, consistent with the federal Clean Air Act,...No representative of...the technical assistance unit...may have enforcement authority...Consultation(s)...shall not be regarded as an inspection or investigation...No enforcement action shall be taken...for violations...unless and until the facility owner or operator has been provided reasonable time to correct (any) violation." Violations that pose immediate threats to public health and the environment may result in immediate enforcement action.</p> <p>SBAP staff are obligated to report personally-detected violations (i.e., from on-site visits) to agency enforcement staff. Reporting is discretionary in the case of suspected violations or those suggested by the source with the exception of those posing "imminent threat."</p>
West Virginia	<p>SBAP operates separately and independently from the enforcement group of the agency. SBAP currently housed in a separate physical location. To better help small businesses, enforcement refers some violators to SBAP for technical assistance to facilitate compliance. SBO also intervenes in specific enforcement actions to ensure that small businesses are fairly treated. SBAP does not refer any cases to enforcement, except in the case of imminent danger. However, to ensure that compliance is eventually achieved, SBAP will make on-site assessment files available to enforcement after an eighteen month grace period. The business is not shielded from enforcement actions related to violations independently discovered by inspectors during this period. Such independent discovery may occur through routine inspection activity or complaint investigation.</p>
Wisconsin	<p>The SBTCP responsibilities are split between the WI DNR and the WI DOD. As a result, the majority of contact that the SBTCP has with the public is handled by non-regulatory DOD personnel. Our program has a confidentiality policy that gives a business confidentiality when they speak with a DOD representative. If they speak with a DNR representative, they have a 90-day grace period to correct the deficiency. Our confidentiality policy does not provide immunity for businesses that are undergoing an inspection.</p>
Wyoming	<p>By Wyoming law, all emission and pollution information must be available to the public. The only information that can be kept confidential is that relating to trade secrets. The department maintains that its statutory authority and commitment to resolve violations of the Environmental Quality Act through conference and conciliation whenever possible assures small businesses that they will not be subject to enforcement and penalties for violations discovered in the course of receiving technical assistance. The CAP does not feel that this assurance is adequate and currently seeks to have the department provide that assurance by adopting a policy and promulgating it into rules department-wide that any small business seeking compliance assistance will not be penalized for disclosure of violations providing a good faith effort is made to correct them in a timely manner. This issue has not yet been resolved.</p>