



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

**Report To Congress  
For The Period  
January To December 1998**

## **ACKNOWLEDGMENTS**

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



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## **LIST OF COMMON ACRONYMS**

Below is a list of major abbreviations and acronyms that are commonly used in this report.

|               |  |
|---------------|--|
| <b>BACT</b>   | <b>Best Available Control Technology</b>                       |
| <b>CAA</b>    | <b>Clean Air Act as amended in 1990</b>                        |
| <b>CAP</b>    | <b>Compliance Advisory Panel</b>                               |
| <b>COI</b>    | <b>Conflict of Interest</b>                                    |
| <b>EPA</b>    | <b>Environmental Protection Agency</b>                         |
| <b>FESOP</b>  | <b>Federally Enforceable State Operating Permit</b>            |
| <b>FTE</b>    | <b>Full-time Equivalent</b>                                    |
| <b>HAP</b>    | <b>Hazardous Air Pollutant</b>                                 |
| <b>ICR</b>    | <b>Information Collection Request</b>                          |
| <b>MACT</b>   | <b>Maximum Achievable Control Technology</b>                   |
| <b>MOU</b>    | <b>Memorandum of Understanding</b>                             |
| <b>MSDS</b>   | <b>Material Safety Data Sheet</b>                              |
| <b>NESHAP</b> | <b>National Emission Standard for Hazardous Air Pollutants</b> |
| <b>NOV</b>    | <b>Notice of Violation</b>                                     |
| <b>OECA</b>   | <b>Office of Enforcement and Compliance Assurance</b>          |
| <b>OMB</b>    | <b>Office of Management and Budget</b>                         |
| <b>P2</b>     | <b>Pollution Prevention</b>                                    |
| <b>PERC</b>   | <b>Perchloroethylene</b>                                       |
| <b>PTE</b>    | <b>Potential to Emit</b>                                       |
| <b>RACT</b>   | <b>Reasonably Available Control Technology</b>                 |
| <b>RCRA</b>   | <b>Resource Conservation and Recovery Act</b>                  |
| <b>RMP</b>    | <b>Risk Management Plan</b>                                    |
| <b>SBA</b>    | <b>Small Business Administration</b>                           |
| <b>SBAP</b>   | <b>Small Business Assistance Program</b>                       |
| <b>SBDC</b>   | <b>Small Business Development Center</b>                       |

|        |  |
|--------|--|
| SBO    | Small Business Ombudsman   |
| SBREFA | Small Business Regulatory Enforcement Fairness Act   |
| SBTCP  | Small Business Stationary Source Technical and Environmental Compliance Assistance Program |
| SIC    | Standard Industrial Classification   |
| SIP    | State Implementation Plan  |
| UST    | Underground Storage Tank   |
| VOC    | Volatile Organic Compound  |

## EXECUTIVE SUMMARY

The U.S. Environmental Protection Agency's (EPA's) Small Business Ombudsman (SBO) is pleased to submit this fourth 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, 1998.

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

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

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

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

During this fourth year of monitoring the SBTCPs, over 1,000,000 small businesses have been directly reached (as tallied by assistance efforts to specific industry sectors). This is significantly higher than the 78,500 reported in 1997; a comparison, however, is not valid due to the differing reporting formats between 1997 and 1998. In 1997, the number of businesses assisted was counted by industry sector general and on-site assists only; other types of assistance were not counted by industry sector. In 1998, the number of businesses assisted was tallied both by industry sector and eight separate types of assistance. The latter format more fully captures the true picture of businesses assisted by the programs.

SBTCP staff members continue to fill an important role as facilitator or mediator between small business owners/operators and regulatory agencies, enhancing communication to promote understanding and sensitivity on both sides. Based on the information reported, improvements in compliance occur because businesses have someone to turn to for assistance and advice, and to act as an effective liaison with regulatory agencies.

SBTCP yearly operational growth has stabilized over the past several years. As of the end of 1998, 51 SBOs (96 percent), all 53 SBAPs (100 percent), and 43 CAPs (81 percent) were operational. The SBO function is staffed with 2 or fewer full time equivalents (FTEs) in 83 percent of the programs, and the SBAP function has 4 or fewer FTEs in 72 percent of programs; these figures rose slightly from the last two years. Fifty-seven percent of programs (compared to 58 percent last year) report that at least the required 7 members have been appointed to their CAPs.

Budgets for the SBTCPs have a wide range from \$16,000 to over \$2,000,000 for 1998. 95 percent of SBOs (42 of 44) with their own budgets operate their programs with less than \$200,000. Similarly, of the 42 SBAPs with their own budgets, 86 percent are allotted less than \$400,000. As programs mature and the cost of establishing programs stabilize, more programs are projecting fairly consistent budgets for the next reporting period (41 this year versus 39 last year). The number of programs projecting budget increases has held steady at six this year.

Ninety-one percent of SBTCPs provided specific information on the types of industry sectors and number of facilities that their programs assisted. Seventy-two industry sectors received assistance in 1998 (the number of industry sectors has been standardized). The top ten industry sectors receiving assistance by SBTCPs in 1998 were:

1. Cross Sector
2. Other (not classified)\*
3. Organizations/Associations
4. Auto/Body Maintenance, Repair, Refinishing\*
5. Government\*
6. Printing/Graphic Arts\*
7. Dry Cleaning/Laundry Services\*
8. Recycling
9. Agriculture/Farming/Crop Service
10. Paints and Painting/Coatings.

\* Also in the top ten in 1997.

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

1. Dry Cleaning/Laundry Services (44 programs)\*
2. Auto/Body Maintenance, Refinishing, Repair (44 programs)\*
3. Printing/Graphic Arts (39 programs)\*
4. Furniture Manufacturing/Repair/Wood Finishing (39 programs)\*
5. Metal Fabricating/Finishing (21 programs)
6. Attorney/Consultant/Engineer (35 programs)
7. Government (34 programs)
8. Organizations/Associations (34 programs)
9. Chemicals/Products (33 programs)
10. Hospitals/Medical Health Services (33 programs).

These were the same top four industry sectors in 1997.

Toll-free hotlines, on-site visits, seminars, mailings, and publications are among the wide range of outreach mechanisms used to serve the small business community. Other state-of-the-art outreach activities, such as Internet home pages, are seeing increased use. The number of programs with web pages more than doubled from 13 in 1995 to 28 in 1996, rose in 1997 to 41 and to 48 in 1998.

New for 1998, programs also noted outreach strategies they found to be particularly effective in assisting small businesses. At least ten programs each mentioned the following strategies: workshops (20 programs), on-site visits and direct contact (19), manuals/literature/newsletters (12), and direct mailings (11).

From year to year, programs have stressed the value of direct contact in building trust and confidence in the business community. Because of their nature, on-site visits and workshops typically reach fewer businesses than “mass” outreach strategies like mailings and publications. However, programs indicate that the quality of the contacts made through direct interaction between business owner and technical assistance provider can lead to improved compliance.

While the CAA called for the establishment of SBTCPs for air-related issues, a number of states began their programs as multimedia (offering assistance with water, solid and hazardous waste, etc. in addition to air); more have transitioned their programs to multimedia. Forty programs indicated they have a full or partial multimedia assistance focus. Their small business clients need and expect it. Small businesses appreciate “one stop shopping” for their compliance and technical assistance questions, rather than working through numerous media-based departments.



Thirty-nine of the 43 operational CAPs provided information on a variety of their activities. Primary CAP activities were reviewing SBO/SBAP outreach efforts, reviewing SBTCP documents for compliance, and defining CAP responsibilities. 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 SBTCP development. The value-added activities of these CAP members underscore the need for states still without operational CAPs to complete the appointment/reappointment process and initiate the CAP function.

Eighty-three percent of SBOs (up from 79 percent in 1997), 91 percent of SBAPs (the same as 1997), and 51 percent of CAPs (up from 49 percent in 1997) 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.

All programs (as compared to 98 percent last year) report actions have been taken to minimize duplication of efforts among SBTCPs. Sharing information is a practical approach to maximizing program efficiency while enhancing the cost-effectiveness of funding spent on individual programs.

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

- Ninety-one percent of programs (as compared to 89 percent last year and 58 percent in 1996) report taking specific actions associated with the Paperwork Reduction Act, with the most common action being receiving and providing information electronically.
- Eighty-nine percent of programs (the same as last year and up from 51 percent in 1996) report taking specific actions consistent with the intent of the Regulatory Flexibility Act. The primary activities by programs were reviewing SBTCP documents for compliance and ensuring that small businesses could participate in rulemaking.
- Seventy-seven percent of SBTCPs (as compared to 75 percent last year and 34 percent in 1996) reported specific actions similar to those associated with the Equal Access to Justice Act. These include the availability of funding or technical assistance services for citizen groups aggrieved by permit actions of a regulatory agency, the review of SBTCP documents for compliance, and the review of instances where state actions against small businesses appear unjustified.

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

As a new reporting element for 1998, programs were asked to define and prioritize their own program goals. They also were asked to discuss strategies to evaluate their goals and the results of this measurement process. Increasing understanding of environmental obligations and improving compliance rates were the two most frequently listed goals. For evaluation, most programs focused on the number of businesses reached and the types of assistance offered to measure their success. Measuring compliance improvements as a result of SBTCP assistance has been attempted by only a few states to date.

All SBTCPs provided insight on the types of compliance issues addressed during the course of providing technical assistance to small businesses. The two most common compliance problems mentioned by small businesses were, "Not understanding the regulatory requirements," and "incomplete recordkeeping." The former has been the number one compliance problem cited for the last three years. Compliance issues have remained consistent from year to year. Identifying key problems and gaps in understanding by the small businesses have helped the SBTCPs to best target their assistance efforts.

Forty SBTCPs provided recommendations for changes to facilitate small business compliance with the CAA. Since 1995, the most frequent recommendation was flexibility in applying regulations to small businesses (25 percent of programs this year). Another common recommendation mentioned by 23 percent of programs was for continued and increased funding for the SBTCPs.

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. Ninety-one percent of programs reported no problems concerning confidentiality or with conflict of interest issues during the course of providing services regardless of whether a confidentiality policy is in place. Program structures range from a guarantee of confidentiality (most common) to offering no confidentiality. Many programs have policies that protect small businesses from penalties if violations are discovered during the course of their receiving technical assistance.

As the final new reporting element for 1998, programs were asked how they used EPA's Policy on Compliance Incentives for Small Businesses or a comparable state policy for small businesses/small communities. Very few states are making use of this policy or developing their own. Eighteen states indicated that either the EPA or a state policy has been adopted, but only four states indicated the policy has been put to use. Programs likely are not yet tracking such statistics, as evidenced by the high number of programs not answering this question.

The SBTCPs offer important one-on-one contacts, provide valuable information such as the need to have operating permits, maintaining records, compliance options, pollution prevention technologies and techniques, and compliance requirements. This assistance enables small businesses to arrive at informed decisions and more effectively come into compliance.

## **CONCLUSIONS AND RECOMMENDATIONS**

- As has been noted since 1995, SBTCPs are being run by hardworking, dedicated staffs who operate successful programs with what they report to be often limited budgets and resources. Small businesses are grateful for the technical assistance and personalized attention from people they can trust. In this fourth year of gathering information from the programs, over 1,000,000 small businesses have been reached (as tallied by industry sector).
- SBTCPs facilitate dialog between the small business community and the regulatory community, fostering trust, and improving attitudes and awareness towards regulatory compliance.
- SBTCPs have significant expertise and are increasingly becoming multimedia as states want to offer this type of assistance, and small businesses are requesting it. Programs are seeking ways to expand the scope and quality of the services they offer and the means to fund the enhanced services. To maximize their budgets and staffing capabilities and to minimize duplication of effort, programs are encouraged to use the resources of the federal SBO and SBAP plus those developed by other SBTCPs.
- Commonly identified compliance problems include not understanding regulatory requirements and improper recordkeeping. Many current SBTCP activities are designed to remedy 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.

- 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 activities for following the intent of the provisions of these three Acts. The number of programs reporting specific activities associated with these Acts has significantly increased in the past several years. The careful review of SBTCP documents and the development of simplified forms and permits are among the positive actions implemented to fulfill the intent of the Acts.
- Program activities primarily emphasize mechanisms to reach larger audiences (e.g., mailings, hotlines). However, one-on-one assistance has been reported as the most effective method in bringing small businesses into compliance, and programs are encouraged to increase their emphasis on personalized assistance. Allocation of adequate resources to permit on-site visits by program staff is important. On-site visits (as tallied by industry sector) increased to over 14,600 in 1998, up from almost 6,000 in 1997, and over 3,800 in 1996.
- Efficiency of information transfer (among SBTCPs and to small businesses) can be realized through the increased use of Internet home pages. Presently, 91 percent of programs operate a home page, up from 77 percent last year and 53 percent in 1996. Such electronic services also would be promising mechanisms to avoid duplication of effort among programs. Programs again are encouraged to explore the potential of the Internet for sharing information with small businesses and with other SBTCPs.
- Only 21 percent of SBTCPs reported the availability of financial assistance programs in 1998, up from 13 percent last year. Small businesses have expressed their need for creative financing mechanisms. Programs are encouraged to explore the potential for sponsoring or facilitating financial assistance programs for pollution control or pollution prevention capital expenses.
- SBTCPs report that they are often under funded and understaffed as they provide their current level of services. Because of this, they may be challenged to expand their function both in air-related outreach and multimedia technical assistance. SBTCPs are encouraged to better utilize the expertise of their CAP members to enhance improvements in their technical assistance programs. As has been noted in the three previous Reports, several states still do not have operational CAPs. A number of CAPs also need to address vacancies of the CAP due to expired terms.

## **1.0 INTRODUCTION AND REPORT OVERVIEW**

### **1.1 RATIONALE AND OBJECTIVE OF THE REPORT TO CONGRESS**

The U.S. Environmental Protection Agency's (EPA's) Small Business Ombudsman is pleased to submit this Report to Congress describing the accomplishments and activities of the state/territory Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCPs) during the January 1 - December 31, 1998 reporting period.

This is the fourth 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 (CAA) as amended in 1990.

This report is submitted in accordance with Section 507(d), *Monitoring*, of the CAA, which directs EPA to provide Congress with periodic reports on the SBTCPs. 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 SBTCPs.

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 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 applied for Information Collection Request (ICR) Approval from the Office of Management and Budget (OMB) for the Reporting Form. The Form subsequently was approved and was assigned OMB Number 2060-0337, expiration date July 31, 1998.

In June 1998, the EPA SBO submitted a request for ICR renewal. State program representatives conducted a lengthy review and revision process of the Reporting Form. Questions were streamlined, several redundant and less pertinent questions were eliminated, and other questions were added at the request of the states. OMB approved the renewal request, and the Form was assigned OMB Number 2060-0337, expiration date September 30, 2001.

In December 1998, EPA's SBO distributed copies of the SBTCP Annual Reporting Form (for the reporting period January through December 1998) to state/territory SBTCP contacts (primarily SBOs). These contacts were requested to coordinate completion of this Form among their SBO, SBAP, and CAP. The 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 1998 SBTCP Reporting Form is enclosed as Appendix A.

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

Programs were asked to complete and submit the Form to the EPA's SBO by February 15, 1999. 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 1998 SBTCP Reports (53 programs total) to EPA's SBO.

In addition, Arizona, California, and Kentucky have distinct air quality districts or counties with regulatory jurisdiction within their states, which also submitted full or partial reports. In Arizona, Maricopa County submitted a separate report. For California, the South Coast Air Quality Management District submitted a full report. For Kentucky, Jefferson County submitted a report. For statistical purposes of this report, data from states that submitted multiple reports have not been combined except where noted. Raw data for the separate air quality districts are shown in the appendices. Percentages have been rounded.

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

### **1.3 ORGANIZATION OF THE REPORT**

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

- |                    |  |
|--------------------|--|
| <b>Section 1.0</b> | <b>Introduction and Report Overview</b>  |
| <b>Section 2.0</b> | <b>Overview of the SBTCP</b> -- 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.   |
| <b>Section 3.0</b> | <b>SBTCP Status, Budgets, Staffing, and Organization</b> -- This section encompasses these four categories of information about the SBTCPs.  |
| <b>Section 4.0</b> | <b>SBTCP Activities and Services</b> -- In this section, assistance to industry sectors and the types and levels of services provided by the 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** -- Program goals and evaluation strategies are discussed. General information on some of the accomplishments and highlights of the programs in 1998 are outlined. Program tips and barriers plus success stories and case studies also are included.

**Section 6.0**      **Compliance Assurance Issues** -- Information on the effectiveness of the SBTCPs in providing compliance assistance support to state small businesses is provided in this section. Recommendations to facilitate compliance and confidentiality issues are discussed. Finally, programs report on their use of EPA's Small Business/Small Communities Policy.

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



## **2.0 OVERVIEW OF THE SBTCP**

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

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

The CAA also required states/territories to develop a State Implementation Plan (SIP) for implementing an SBTCP by November 1992. As of December 31, 1998, 50 of 53 states/territories (94 percent) had received approval from EPA for their SIPs implementing Section 507 of the CAA. States/territories whose SIPs have not yet been officially submitted and/or approved are:

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

### **2.1 SMALL BUSINESS OMBUDSMAN**

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

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

## **2.2 SMALL BUSINESS ASSISTANCE PROGRAM**

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

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

## **2.3 COMPLIANCE ADVISORY PANEL**

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

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

The responsibilities of the CAP are to:

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

## **2.4 EPA's RESPONSIBILITIES UNDER SECTION 507 OF THE CAA**

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

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

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

## **2.5 FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM**

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

### **3.0 SBTCP STATUS, BUDGETS, STAFFING, AND ORGANIZATION**

Information on the operating status (Section 3.1), budgets (Section 3.2), staffing levels (Section 3.3), and the administrative location of the three components of the SBTCPs (SBOs, SBAPs, and CAPs) within their states/territories (Section 3.4) for the January - December 1998 reporting period may be found in this chapter.

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

#### **3.1 OPERATING STATUS**

Importantly, by December 31, 1998, 51 SBOs (96 percent of the 53 states and U.S. territories) and all 53 SBAPs (100 percent) had been established and were providing assistance to small businesses. Only 43 programs reported that their CAPs were operating; however, 45 programs reported that their CAPs had been established.

The number of established and operational SBOs increased by one to 51 since holding at 50 from 1995 to 1997. The number of established and operational SBAPs is now complete at 53 for the first time. Two new CAPs were established in 1998, but the number of established CAPs remains at 45; some states have amended previously reported dates. Four CAPs became operational in 1998 (43 in 1998 versus 39 in 1997).

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

| TABLE 3-1<br>OPERATING STATUS OF THE SBTCP COMPONENTS |                                     |            |                                     |            |
|---|-------------------------------------|------------|-------------------------------------|------------|
|   | COMPONENTS ESTABLISHED <sup>1</sup> |            | COMPONENTS OPERATIONAL <sup>1</sup> |            |
|   | # Programs                          | % Programs | # Programs                          | % Programs |
| <b>SBO<sup>2</sup></b>                                | 51                                  | 96         | 51                                  | 96         |
| <b>SBAP</b>   | 53                                  | 100        | 53                                  | 100        |
| <b>CAP<sup>3</sup></b>                                | 45                                  | 85         | 43                                  | 81         |

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 12/31/98, SBOs were reported not to be established or operating in Massachusetts or Vermont.

Note 3: As of 12/31/98, CAPs were reported not to be established or operating in 8 programs: California, Hawaii, Iowa, Maryland, Massachusetts, Rhode Island, Tennessee, or the Virgin Islands. In addition, Arizona reported that their CAP had been established, but was not yet operating. Alabama did not provide operational data for its CAP.

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

| TABLE 3-2<br>START OF OPERATIONS FOR SBTCP FUNCTIONS |        |       |        |       |        |       |
|--|--------|-------|--------|-------|--------|-------|
|  | SBO    |       | SBAP   |       | CAP    |       |
|  | Number | Total | Number | Total | Number | Total |
| Pre-1990   |        |       | 1      | 1     |        |       |
| 1991   |        |       | 1      | 2     |        |       |
| 1992   | 11     | 11    | 12     | 14    | 1      | 1     |
| 1993   | 20     | 31    | 16     | 30    | 8      | 9     |
| 1994   | 10     | 41    | 16     | 46    | 12     | 21    |
| 1995   | 7      | 48    | 5      | 51    | 11     | 32    |
| 1996   |        |       | 1      | 52    | 4      | 36    |
| 1997   | 2      | 50    |        |       | 3      | 39    |
| 1998   | 1      | 51    | 1      | 53    | 4      | 43    |
| % operational by<br>12/31/98                         | 96%    |       | 100%   |       | 81%    |       |

## **3.2 BUDGETS**

Information about the total SBTCP operating budgets may be found in Section 3.2.1, with details on the SBO, SBAP, and CAP budgets contained in Sections 3.2.2, 3.2.3, and 3.2.4, respectively.

### **3.2.1 1998 Reporting Period**

As detailed in the paragraphs and tables below, the total operating budgets for the SBTCPs varied from \$16,000 (District of Columbia) to over \$2,000,000 (New York) for the 1998 reporting year. 1998 operating budget ranges for the SBTCPs are shown in Table 3-3; 1997 and 1996 ranges also are shown for comparison. Details on the operating budgets, by program, for the individual SBO, SBAP, and CAP components, including the source of these funds, may be found in Appendix D-3.

| TABLE 3-3<br>1998, 1997, and 1996 SBTCP OPERATING BUDGET RANGES |            |                         |            |                         |            |                         |
|---|------------|-------------------------|------------|-------------------------|------------|-------------------------|
|   | 1998       |                         | 1997       |                         | 1996       |                         |
| BUDGET \$   | # Programs | % Programs <sup>1</sup> | # Programs | % Programs <sup>1</sup> | # Programs | % Programs <sup>1</sup> |
| 0   |            |                         |            |                         | 1          | 2                       |
| 1 - 100,000   | 8          | 15                      | 10         | 19                      | 9          | 17                      |
| 100,001 - 200,000   | 15         | 28                      | 15         | 28                      | 19         | 36                      |
| 200,001 - 300,000   | 10         | 19                      | 7          | 13                      | 5          | 9                       |
| 300,001 - 400,000   | 9          | 17                      | 12         | 23                      | 9          | 17                      |
| 400,001 - 500,000   | 4          | 8                       | 3          | 6                       | 2          | 4                       |
| 500,001 - 600,000   | 3          | 6                       | 1          | 2                       | 2          | 4                       |
| 600,001 - 700,000   | 1          | 2                       |            |                         | 1          | 2                       |
| 700,001 - 800,000   |            |                         | 1          | 2                       |            |                         |
| 800,001 - 900,000   | 1          | 2                       | 1          | 2                       | 2          | 4                       |
| 900,001 - 1,000,000   | 1          | 2                       |            |                         |            |                         |
| >1,000,000 <sup>2</sup>   |            |                         | 1          | 2                       | 1          | 2                       |
| >2,000,000 <sup>3</sup>   | 1          | 2                       | 1          | 2                       | 1          | 2                       |
| Report submitted, no data provided <sup>4</sup>                 |            |                         | 1          | 2                       | 1          | 2                       |
| <b>TOTAL</b>  | <b>53</b>  |                         | <b>53</b>  |                         | <b>53</b>  |                         |

Note 1: County budgets are not combined with state budgets, nor are they counted separately.

Note 2: Texas (1997 and 1996).

Note 3: New York (1998, 1997, and 1996).

Note 4: Hawaii (1997, 1996).

### 3.2.2 Comparison of Previous and Projected Budgets

A comparison of budgets from 1997, 1998, and 1999 (projected) is valuable in tracking program growth and resource allocation. Programs were asked to indicate significant budget changes (greater than ten percent) from year to year and to provide insight into any major shifts (more than ten percent) in funding levels. SBTCP reporting period budget comparisons are shown in Table 3-4.

**TABLE 3-4  
SBTCP REPORTING PERIOD BUDGET COMPARISONS**

|  | BUDGET DECREASE<br>(> 10% change) |               | BUDGET CONSISTENT<br>(< 10% change) |               | BUDGET INCREASE<br>(> 10% change) |               | INSUFFICIENT DATA<br>FOR COMPARISON <sup>1</sup> |               |
|--|-----------------------------------|---------------|-------------------------------------|---------------|-----------------------------------|---------------|--|---------------|
|  | #<br>Programs                     | %<br>Programs | #<br>Programs                       | %<br>Programs | #<br>Programs                     | %<br>Programs | #<br>Programs                                    | %<br>Programs |
| 1997 to<br>1998<br>Reporting<br>Period | 4                                 | 8             | 38                                  | 72            | 11                                | 21            | 0  | 0             |
| 1998 to<br>1999<br>Reporting<br>Period | 4                                 | 8             | 41                                  | 77            | 6                                 | 11            | 2 <sup>2</sup>                                   | 4             |

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

Note 2: New York, Wisconsin.

In reviewing the combined budgets for the SBO, SBAP, and CAP functions of the SBTCPs, 11 programs (21 percent) indicated a budget increase (of at least ten percent) from the 1997 to 1998 reporting periods. Six programs (11 percent) showed an increase from the 1998 to 1999 reporting periods.

As programs mature and the cost of establishing programs stabilizes, more programs are projecting fairly consistent budgets for the next reporting period (41 this year as compared to 39 last year). The number of programs projecting a budget increase for the subsequent reporting period held steady at six this year.

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

- Michigan's funding is based on collected air permitting fees from the state's Title V program. In 1998, the fee structure was increased to begin supporting FY 98-99. Both SBO and SBAP will experience an increase in funding of 26.6 percent and 28.9 percent, respectively, beginning 10/1/98. (\$487,700/1998 to \$627,300/1999)
- In Ohio's SBAP, no new employees were hired in 1998. The 1999 projected budget reflects an allowance for one more staff member. In addition, a significant part of the 1998 supervisor's salary was charged to another program due to temporary transfer. (\$437,000/1998 to \$539,000/1999)
- Utah's EPA Partnership for Compliance Grant has introduced substantial contract funds that have not been obligated due to the lengthy planning process. These funds will be obligated by September 1999. (\$204,000/1998 to \$237,000/1999)



Thirty-eight programs (72 percent) report steady budget levels (less than a ten percent change) for the 1997 to 1998 reporting periods, and 41 programs (77 percent) indicate consistent budget levels from the 1998 to 1999 (projected) reporting periods.

Four programs (8 percent) showed a decrease (more than ten percent) from the 1997 to 1998 reporting periods, and four programs (8 percent) also projected a decrease from the 1998 to 1999 periods. Budget reductions often are attributed to program reorganizations and consolidations, expiration of grant funds, and lower projected costs to maintain a program (versus the higher resource requirements to develop a program).

Eighty-eight percent of the programs reported either a consistent or increasing budget from the 1998 to 1999 (projected) reporting periods.

Budgets for the 1997, 1998, and 1999 (projected) reporting periods for the SBO function, SBAP function, and CAP function may be found in Appendix D-4.

### **3.2.3 SBO Operating Budgets**

Forty-four SBOs have their own budgets (versus having their budgets combined with other SBTCP functions). Budgets for these SBOs are concentrated in a range below \$200,000, with 42 of 44 SBOs (95 percent) reporting budgets between \$0 and \$200,000. (The two exceptions are New York's SBO, who reports a budget of \$1,170,000 and Ohio's at \$208,000.) The primary source of funding for all programs is Title V fees (55 percent), which are collected at the state/territory level. Other sources of funding include RCRA grant funds, permit and other fees, EPA grants, and state general funds.

The range of 1998 operating budgets for the SBOs with their own budgets is shown in Table 3-5. A comparison of SBO budgets for the past three years is not practical, as a different number of SBOs have had their own budgets each year.

**TABLE 3-5**  
**1998 SBO OPERATING BUDGET RANGES**  
**(44 non-combined budgets)**

| <b>Budget (\$)</b>                              | <b># Programs</b> | <b>% Total Programs</b> |
|---|-------------------|-------------------------|
| 0 - 25,000 <sup>1</sup>                         | 12                | 23                      |
| 25,001 - 50,000                                 | 9                 | 17                      |
| 50,001 - 75,000                                 | 8                 | 15                      |
| 75,001 - 100,000                                | 6                 | 11                      |
| 100,001 - 200,000                               | 7                 | 13                      |
| 200,001 - 300,000                               | 1                 | 2                       |
| >1,000,000                                      | 1                 | 2                       |
| Combined budgets <sup>2</sup>                   | 8                 | 15                      |
| Report submitted, no data provided <sup>3</sup> | 1                 | 2                       |
| <b>TOTAL</b>                                    | <b>53</b>         |                         |

Note 1: An answer of N/A or "as needed" was counted as "zero" if SBO was administratively assigned their own budget.

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

Note 3: Puerto Rico.

### 3.2.4 SBAP Operating Budgets

Forty-two SBAPs have their own budgets. SBAP budgets are spread across a wider dollar range as compared to the SBOs with 12 of 42 programs (29 percent) between \$0 and \$100,000, 12 of 42 programs (29 percent) between \$100,001 and \$200,000, and 7 of 42 programs (17 percent) between \$200,001 and \$300,000. Budgets range from \$8,000 (District of Columbia, which is closely followed by South Dakota at \$10,000) to a high of \$1,000,000 for New York. Title V fees again are the main funding source (64 percent of all programs); funds from EPA grants, permit and other types of fees, and general revenues also are used to support SBAPs.

The range of 1998 operating budgets for the SBAPs with their own budgets is shown in Table 3-6. A comparison of SBAP budgets for the past three years is not practical, as a different number of SBAPs have had their own budgets each year.

| <b>TABLE 3-6</b><br><b>1998 SBAP OPERATING BUDGET RANGES</b><br><b>(42 non-combined budgets)</b> |                   |                         |
|--|-------------------|-------------------------|
| <b>Budget (\$)</b>   | <b># Programs</b> | <b>% Total Programs</b> |
| 0 - 25,000   | 2                 | 4                       |
| 25,001 - 50,000  | 3                 | 6                       |
| 50,001 - 75,000  | 5                 | 9                       |
| 75,001 - 100,000   | 2                 | 4                       |
| 100,001 - 200,000  | 12                | 23                      |
| 200,001 - 300,000  | 7                 | 13                      |
| 300,001 - 400,000  | 5                 | 9                       |
| 400,001 - 500,000  | 3                 | 6                       |
| 500,001 - 600,000  | 1                 | 2                       |
| 600,001 - 700,000  | 1                 | 2                       |
| 1,000,000  | 1                 | 2                       |
| Combined budgets <sup>1</sup>  | 11                | 21                      |
| <b>TOTAL</b>   | <b>53</b>         |                         |

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

### 3.2.5 CAP Operating Budgets

Forty-one CAPs have their budgets calculated separately, ranging from \$0 to a high of \$10,000 (two programs, Montana and Wyoming). Eighty-eight percent of CAPs with their own budget operate with \$5,000 or less. Title V fees are the most commonly listed funding source for all CAPs (43 percent).

The range of 1998 CAP operating budgets is shown in Table 3-7. A comparison of CAP budgets for the past three years is not practical, as a different number of CAPs have had their own budgets each year.

**TABLE 3-7**  
**1998 CAP OPERATING BUDGET RANGES**  
**(41 non-combined budgets)**

| Budget (\$)                                     | # Programs | % Total Programs |
|---|------------|------------------|
| 0 <sup>1</sup>                                  | 15         | 28               |
| 1 - 1,000                                       | 5          | 9                |
| 1,001 - 2,000                                   | 3          | 6                |
| 2,001 - 3,000                                   | 7          | 13               |
| 3,001 - 4,000                                   | 1          | 2                |
| 4,001 - 5,000                                   | 8          | 15               |
| 10,000  | 2          | 4                |
| Combined budgets <sup>2</sup>                   | 9          | 17               |
| Report submitted, no data provided <sup>3</sup> | 3          | 6                |
| <b>TOTAL</b>                                    | <b>53</b>  |                  |

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

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

Note 3: Alabama, Arizona, Puerto Rico.

### 3.3 STAFFING LEVELS

Forty-four programs (83 percent) report operating their SBOs with two or fewer full-time equivalents (FTEs) as shown in Table 3-8. This number has increased from 41 in 1997.

In 1998 38 programs (72 percent) operated their SBAPs with four or fewer FTEs (up from 37 programs in 1997), which include both paid and unpaid staff and may include retired engineers. There are some notable exceptions to these staffing levels, such as Louisiana, Indiana, and California, which report using 10, 12, and 20 FTEs, respectively, to support their SBAP function. Also, Texas reported the services of over 50 unpaid "EnviroMentors" who assist with SBAP duties, for 84.50 FTEs supporting Texas' SBAP.

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

| <b>TABLE 3-8</b><br><b>1998 STAFFING LEVELS (as FTEs<sup>1</sup>) SERVING THE SBO &amp; SBAP FUNCTIONS</b> |            |           |                                |
|--|------------|-----------|--------------------------------|
| # FTEs   | # Programs |           |                                |
|  | SBO        | SBAP      | Combined Staffing <sup>2</sup> |
| 0 - 0.09   | 2          | 3         |                                |
| 0.1 - 1  | 30         | 9         |                                |
| 1.1 - 2  | 12         | 11        |                                |
| 2.1 - 3  | 4          | 10        | 1                              |
| 3.1 - 4  |            | 5         |                                |
| 4.1 - 5  |            | 4         |                                |
| 5.1 - 6  | 1          | 2         |                                |
| 6.1 - 7  |            | 1         |                                |
| 7.1 - 8  | 1          | 3         |                                |
| 10   |            | 1         |                                |
| 12   |            | 1         |                                |
| 14.5   | 1          |           |                                |
| 20   |            | 1         |                                |
| 84.5   |            | 1         |                                |
| N/A <sup>3</sup>   | 1          |           |                                |
| <b>TOTAL</b>   | <b>52</b>  | <b>52</b> | <b>1</b>                       |

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

Note 2: Florida combined its SBO and SBAP functions.

Note 3: Not applicable: SBO-Massachusetts.

Thirty programs (57 percent), compared to 31 last year, report that at least the required seven members have been appointed to their CAPs. An overview of CAP appointments is shown in Table 3-9. In CAPs with fewer than seven members, several programs indicated that expired terms on their CAPs have not yet been filled or that their CAPs have not yet been established. Program statistics of the number of CAP members in each category (small business, state agency, general public, not yet appointed, other) may be found in Appendix D-6.

**TABLE 3-9  
CAP APPOINTMENTS**

|                               | <b># Programs</b> | <b>% Programs</b> |
|-------------------------------|-------------------|-------------------|
| Minimum 7 members appointed   | 30                | 57                |
| Less than 7 members appointed | 18                | 34                |
| Not applicable <sup>1</sup>   | 5                 | 9                 |

Note 1: Hawaii, Maryland, Massachusetts, Minnesota, Virgin Islands.

### 3.4 ADMINISTRATIVE LOCATION OF SBO AND SBAP COMPONENTS

As shown in Table 3-10, 51 programs indicated that their SBOs are located within a state/territory-related agency, typically the environmental agency. The majority of programs (50) report to have located their SBAPs within a state/territory-related agency, typically the environmental agency. Three programs (Kansas, Kentucky, and Pennsylvania) contract their SBAP function to an outside agency or organization. As defined in Section 507, the CAPs are to be independent entities, operating outside of any agency.

**TABLE 3-10  
ADMINISTRATIVE LOCATIONS OF SBO AND SBAP**

| <b>Location</b>                 | <b>SBO</b>        |                   | <b>SBAP</b>       |                   |
|---------------------------------|-------------------|-------------------|-------------------|-------------------|
|                                 | <b># Programs</b> | <b>% Programs</b> | <b># Programs</b> | <b>% Programs</b> |
| State-related agency            | 51                | 96                | 50                | 94                |
| University-related (contracted) |                   |                   | 2                 | 4                 |
| Private contractor              |                   |                   | 1                 | 2                 |
| Not applicable <sup>1</sup>     | 2                 | 4                 |                   |                   |
| <b>TOTAL</b>                    | <b>53</b>         |                   | <b>53</b>         |                   |

Note 1: Massachusetts, Vermont.

As indicated in Table 3-11, 22 SBOs are located in a regulatory section within their agency, while 29 SBOs are housed in a nonregulatory section. Twenty-seven SBAPs reported their location in a regulatory section, 24 indicated nonregulatory, and 2 programs reported association with both regulatory and nonregulatory offices.

| TABLE 3-11<br>REGULATORY / NONREGULATORY LOCATIONS OF SBO AND SBAP |                         |            |            |            |
|--|-------------------------|------------|------------|------------|
|  | SBO                     |            | SBAP       |            |
|  | # Programs <sup>1</sup> | % Programs | # Programs | % Programs |
| Regulatory   | 22                      | 42         | 27         | 51         |
| Nonregulatory  | 29                      | 55         | 24         | 45         |
| Mixed <sup>1</sup>   |                         |            | 2          | 4          |
| Not applicable/Not established <sup>2</sup>                        | 2                       | 4          |            |            |
| TOTAL  | 53                      |            | 53         |            |

Note 1: Massachusetts, Montana.

Note 2: Massachusetts, Vermont.

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 activities and services of the SBTCPs is provided in this section. Industry sectors assisted by the SBTCPs are discussed in Section 4.1. An overview of SBTCP activities and services is provided in Section 4.2. SBTCP assistance requests are outlined in Section 4.3. CAP activities are outlined in Section 4.4. Financial assistance programs are described in Section 4.5. A discussion of how programs minimize duplication through cooperative efforts may be found in Section 4.6. SBTCP efforts to comply with the intent of the Paperwork Reduction Act, Regulatory Flexibility Act, and the Equal Access to Justice Act are summarized in Section 4.7.

For the 1998 reporting year, information on SBTCP services to specific industry sectors was gathered under a new format designed to make the resulting data more complete and meaningful. Please refer to the Reporting Form in Appendix A for the questions pertaining to program activities and services (Section 3).

### **4.1 INDUSTRY SECTORS ASSISTED BY THE SBTCPs**

Programs were asked to report on their assistance to 72 industry sectors in eight assistance categories. The industry sectors and assistance services into which programs could categorize their efforts have been standardized for 1998. Not all states kept information as to industry sectors assisted or total assists provided. Notes on data calculation are included with the various data tables in the appendices.

All 53 SBTCPs (100 percent) provided information on the types of industry sectors and number of facilities that their programs assisted in 1998; data from county and air district programs were included with their state's activities.

The top ten industry sectors receiving SBTCP assistance (by number of assists) in 1998 are shown in Table 4-1.



| <b>TABLE 4-1</b><br><b>TOP 10 INDUSTRY SECTORS ASSISTED</b> |                  |
|---|------------------|
| <b>Industry Sector</b>                                      | <b># Assists</b> |
| Cross Sector  | 1,105,387        |
| Other (not classified)*                                     | 436,145          |
| Organizations/Associations                                  | 159,846          |
| Auto/Body Maintenance, Repair, Refinishing*                 | 38,454           |
| Government*   | 22,615           |
| Printing/Graphic Arts*                                      | 20,337           |
| Dry Cleaning/Laundry Services*                              | 15,310           |
| Recycling   | 13,480           |
| Agriculture/Farming/Crop Services                           | 8,643            |
| Paints & Painting/Coatings                                  | 8,243            |

Note \*: Also in the top 10 in 1997.

The top 10 industry sectors that received assistance from the most programs are shown in Table 4-2.

| <b>TABLE 4-2</b><br><b>TOP 10 INDUSTRY SECTORS ASSISTED BY PROGRAMS</b> |                   |
|---|-------------------|
| <b>Industry Sector</b>  | <b># Programs</b> |
| Dry Cleaning/Laundry Services*  | 44                |
| Auto/Body Maintenance, Refinishing, Repair*                             | 44                |
| Printing/Graphic Arts*  | 39                |
| Furniture Manufacturing/Repair/Wood Finishing*                          | 39                |
| Metal Fabricating/Finishing   | 37                |
| Attorney/Consultant/Engineer  | 35                |
| Government  | 34                |
| Organizations/Associations  | 34                |
| Chemicals/Products  | 33                |
| Hospitals/Medical Health Services                                       | 33                |

Note \*: These industry sectors held the same rankings as in 1997.

A list of businesses reached by industry sector may be found in Appendix E-1. This same list also has been reordered by the number of states providing assistance (Appendix E-2). A summary of individual program responses may be found in Appendix E-3.

New for the 1998 reporting year, programs were asked if they targeted any specific industry sectors for assistance. Forty-seven programs (89 percent) indicated they focused on certain high priority industries. Of the 38 industries mentioned, the following sectors were targeted by at least five programs, as shown in Table 4-3.

| <b>TABLE 4-3<br/>INDUSTRY SECTORS TARGETED FOR ASSISTANCE</b> |                   |
|---|-------------------|
| <b>Industry Sector</b>  | <b># Programs</b> |
| Dry Cleaning/Laundry Services                                 | 22                |
| Printing/Graphic Arts   | 22                |
| Auto/Body Maintenance, Refinishing, Repair                    | 18                |
| Manufacturing (various)                                       | 7                 |
| 112(r) Affected   | 6                 |
| Metal Fabricating/Finishing                                   | 5                 |
| Wood Finishing  | 5                 |
| Paints & Painting/Coatings                                    | 5                 |

#### **4.1.1 Total Businesses Assisted**

As tallied by industry sector, SBTCPs reported they assisted 1,002,446 businesses in 1998. This is significantly higher than the 78,565 reported for 1997; however, a comparison may not be valid due to the differing reporting formats between 1997 and 1998. In 1997, the number of businesses assisted was counted by industry sector general and on-site assists only; other types of assistance were not counted by industry sector. In 1998, the number of businesses assisted was tallied both by industry sector and eight separate types of assistance. The latter format more fully captures the true picture of businesses assisted by the programs. Also, many programs have improved their recordkeeping strategies, resulting in higher quality and more comprehensive data.

When studying the data, several points should be considered. In general, "total businesses reached," as reported by each Section 507 program, is used as the "official"

count for this report. Seventeen programs tried not to double count the number of businesses assisted within a given industry sector. Seven programs did not keep data by industry sector, and only “total businesses reached” was given. Four programs tracked the types of services they offered or the industry sectors they assisted, but did not compile data. One program elected to exclude over 950,000 publications in their “total businesses reached” tally; these publications are reflected in the sector totals, but not in the overall number of businesses reached.

A tally of “total businesses reached,” as reported by each program, may be found in Appendix E-4.

## **4.2 SBTCP ACTIVITIES AND SERVICES**

An overview of activities and services provided by the SBTCPs is discussed in this section. For 1998, programs were asked to provide information about their services separately from the types of assistance requests they received.

### **4.2.1 Outreach Activities and Businesses Reached**

The number of programs offering specific outreach services plus an aggregate of the number of businesses reached through these services in 1998 is presented in Table 4-4. These outreach activities and services are designed to introduce small business people to the available assistance services and to identify common problems and issues to be addressed on a more specific basis.

For 1998, programs reported their outreach statistics for their SBO, SBAP, and CAP combined. Information was requested by the type of assistance (e.g., hotline, on-site visit, etc.) and by industry sector served. With this reporting year, the types of outreach activities and industry sectors on which programs could report were standardized.

**TABLE 4-4  
OUTREACH ACTIVITIES AND BUSINESSES REACHED  
(by number of programs offering)**

| ACTIVITY               | # Programs | % Programs | Total Businesses Reached <sup>1</sup> |
|------------------------|------------|------------|---------------------------------------|
| Hotline                | 51         | 96         | 53,000                                |
| On-site visits         | 51         | 96         | 14,646                                |
| Seminars/Workshops     | 49         | 92         | 36,050                                |
| Mailings               | 44         | 83         | 254,121                               |
| Publications           | 43         | 81         | 1,491,709                             |
| Other                  | 32         | 60         | 75,709                                |
| Teleconferences        | 24         | 45         | 954                                   |
| Home page <sup>2</sup> | 22         | 42         | 136,694                               |

Note 1: "Total businesses reached" is tallied using industry sector assistance data. Some programs tried not to double count. For example, if one printer called a hotline 5 times, one program may count this as 5, while another program may count as 1. Therefore, "total businesses reached" by industry sector will not equal total businesses reached by type of assistance.

Note 2: 48 programs reported having web sites under the question directly addressing this issue.

The most common outreach activities, offered by over 90 percent of programs, were:

- Hotline
- On-site visits.
- Seminars/workshops.

Such activities remain as some of the most common services offered by the programs from year to year.

Detailed information, by program, about the number of occurrences and the number of businesses reached by each reported activity is presented in Appendix E-5.

#### **4.2.2 New Publications**

As noted above, more businesses were reached through publications than through any other method. Forty-three programs reported outreach to 1,491,709 business through publications. Programs were asked to provide a list of new documents they prepared in 1998, which may be found in Appendix E-6.

Examples of the types of publications produced include:

- Fact sheets
- Manuals
- Assistance request forms
- Emission calculation worksheets
- Brochures
- Resource guides and directories
- Drycleaners' calendar
- Training workbooks and checklists
- Permit guides
- Newsletters
- Posters
- Annual reports
- Technical papers
- Generic compliance plans.

#### **4.2.3 Notable Outreach Strategies**

Also new for 1998, programs were asked to note outreach strategies they found to be particularly effective in assisting small businesses. Of the 24 strategies noted by the 47 programs (89 percent) that answered this question, the following received mention by at least 10 programs, as shown in Table 4-5.

| <b>TABLE 4-5</b>                   |                   |
|------------------------------------|-------------------|
| <b>NOTABLE OUTREACH STRATEGIES</b> |                   |
| <b>Outreach Strategy</b>           | <b># Programs</b> |
| Workshops                          | 20                |
| On-site visits/direct contact      | 19                |
| Manuals/literature/newsletter      | 12                |
| Direct mailings                    | 11                |

From year to year, programs have stressed the value of direct contact -- primarily via on-site visits, but also through workshops -- in building trust and confidence in the business community. Because of their nature, on-site visits and workshops typically reach fewer businesses than "mass" outreach strategies like mailings and publications. However, programs indicate that the quality of the contacts made through direct interaction between business owner and technical assistance provider can lead to improved compliance.

Effective outreach strategies as noted by each program may be found in Appendix E-7.

#### 4.2.4 Internet Web Pages

Of particular note is the ever-growing number of programs that are using Internet web pages to disseminate technical assistance information. (Programs are no longer reporting use of electronic bulletin board services. In 1997, only six bulletin boards were operating in conjunction with a program's home page.) Forty-eight programs (91 percent) currently operate home pages, up from 41 in 1997 and 28 in 1996.

The types of information available on these home pages are listed in Table 4-6; detailed information on the home pages, including web site address, usage, and comments received, may be found in Appendix E-8.

| <b>TABLE 4-6<br/>INFORMATION AVAILABLE ON INTERNET HOME PAGES</b> |                   |                   |
|---|-------------------|-------------------|
| <b>Type of Information</b>  | <b># Programs</b> | <b>% Programs</b> |
| Program description   | 46                | 87                |
| Contact listings  | 45                | 85                |
| Links   | 40                | 75                |
| Permitting information  | 40                | 75                |
| Permit forms  | 37                | 70                |
| Regulations   | 35                | 66                |
| Pollution prevention information                                  | 35                | 66                |
| Guidance documents/fact sheets                                    | 34                | 64                |
| Multimedia  | 31                | 58                |
| List of publications  | 27                | 51                |
| Calendar of events  | 26                | 49                |
| Policies  | 26                | 49                |
| Emissions inventory   | 15                | 28                |
| CAP information   | 15                | 28                |
| Other   | 13                | 25                |

\* Programs without web sites: District of Columbia, Hawaii, New Hampshire, Puerto Rico, and Virgin Islands.

A number of programs provided information on comments they have received about their web sites. A sampling of responses is shown below.

- Alaska reports their program has not received very many feedback responses via the Internet. One person indicated he had a hard time finding information on the web pages. SBAP is working with the Governor's Small Business Council to provide easier web site access to the broad range of small business services offered in Alaska.
- California's web site has a contact button. The program receives praise for its web site, particularly for the meta tags that enhance finding information using search words. Their search engine hit percentage is 90 percent.
- Kansas indicated their feedback has been exclusively positive and extremely complementary. They often get OSHA questions, which they refer to appropriate agencies.
- In Texas, feedback includes technical questions about compliance issues for various industries, available publications, and how to participate in the EnviroMentor program.
- Web site users in Washington want to complete registration and application forms electronically.

Internet home pages are efficient mechanisms for SBTCPs to disseminate information to small businesses, as evidenced by the increasing use of electronic media over the last three years. Because the Internet is practical for information transfer from the federal SBO and SBAP, between programs, and to the small business community, increased access to the Internet and expanded web page content should continue to be pursued.

### 4.3 ASSISTANCE REQUESTS

#### 4.3.1 Air-only Versus Multimedia Assistance

Section 507 of the CAA calls for the establishment of technical assistance programs for air-related issues. However, a number of states began their programs as multimedia (offering assistance with water, solid waste, hazardous waste, etc. in addition to air) and more have since transitioned their programs to multimedia assistance, as shown in Table 4-7.

| TABLE 4-7<br>AIR-ONLY VERSUS MULTIMEDIA ASSISTANCE |            |           |
|--|------------|-----------|
| Assistance Focus                                   | # Programs | %Programs |
| Multimedia   | 38         | 72        |
| Air-only   | 13         | 25        |
| Mixed  | 2*         | 4         |

\* Hawaii's and West Virginia's SBOs offer multimedia assistance. Their SBAPs offer air-only assistance.

More and more programs are offering multimedia assistance, because their small business clients need it and expect it. Small businesses appreciate “one stop shopping” for their compliance and technical assistance questions, rather than working through numerous media-based departments.

Each program’s assistance focus is shown in Appendix D-1.

#### 4.3.2 Types of Assistance

With this consideration, as a new element for the 1998 reporting year, SBTCPs were asked for data on the type of assistance requested (e.g., regulatory information, permitting, recordkeeping, etc.). Programs could indicate the number of CAA-related requests and the number of multimedia requests for assistance.

Forty-one programs (77 percent) provided data on CAA/multimedia assistance requests. These data are summarized in Table 4-8. Individual program responses may be found in Appendix E-9.

| <b>TABLE 4-8<br/>CAA/MULTIMEDIA ASSISTANCE REQUESTS</b> |                     |                            |                       |
|---|---------------------|----------------------------|-----------------------|
| <b>Type of Assistance Requested</b>                     | <b>CAA Requests</b> | <b>Multimedia Requests</b> | <b>Total Requests</b> |
| Compliance/Regulatory Information                       | 14,197              | 7,275                      | 21,472                |
| Monitoring  | 1,570               | 137                        | 1,707                 |
| Recordkeeping   | 2,376               | 397                        | 2,773                 |
| Financial/Funding Information                           | 702                 | 573                        | 1,275                 |
| Permitting  | 8,217               | 911                        | 9,128                 |
| General CAA Information                                 | 4,258               | 542                        | 4,800                 |
| Add to Mailing List                                     | 1,308               | 79                         | 1,387                 |
| P2 Assistance   | 1,663               | 1,253                      | 2,916                 |
| Other   | 2,680               | 4,027                      | 6,707                 |
| <b>TOTAL REPORTED REQUESTS*</b>                         | <b>35,703</b>       | <b>17,013</b>              | <b>56,220</b>         |

Note \*: Total requests are as reported by the programs. Numbers will not add up, since some programs merely indicated they provided a certain type of assistance, but did not provide data. Some did not have data by assistance type, but did provide totals.



Requests for compliance/regulatory information far outnumbered any other type of assistance request at 21,472. Permitting information received 9,128 requests followed by "other" types of information at 6,707.

Businesses made over twice as many CAA-related requests for information than they did for multimedia – 35,703 as compared to 17,013. CAA assistance outnumbered multimedia assistance in every assistance category except for "other."

Such data are not surprising, since the SBTCPs were established to provide CAA assistance. Since 40 programs (75 percent) indicate they provide full or partial multimedia assistance, multimedia requests are expected to rise in the coming years.

#### 4.4 CAP ACTIVITIES AND SERVICES

Forty-three CAPs indicated they were operational during the 1998 reporting period, 39 of which reported activities. The primary CAP activities were review of SBO/SBAP outreach efforts (33 CAPs) and review of SBTCP documents for compliance (28 CAPs). This was followed by defining CAP responsibilities (reported by 25 CAPs). These were the same prime activities as 1997.

Major activities of the CAPs during the 1998 reporting period are shown in Table 4-9. A program summary of CAP activities may be found in Appendix E-10.

| <b>TABLE 4-9<br/>MAJOR CAP ACTIVITIES</b>                  |                   |                   |
|--|-------------------|-------------------|
| <b>Activity</b>  | <b># Programs</b> | <b>% Programs</b> |
| Review of SBTCP outreach efforts                           | 33                | 62                |
| Review of SBO/SBAP documents                               | 28                | 53                |
| Define CAP responsibilities                                | 25                | 47                |
| Review/comment on new/proposed regulations, policies, etc. | 20                | 38                |
| Attend training seminars, conferences, etc.                | 18                | 34                |
| Appoint staff/elect officers                               | 15                | 28                |
| Meet with small businesses/trade associations              | 15                | 28                |
| Review/comment on state legislative actions                | 15                | 28                |
| Other  | 7                 | 13                |

CAPs are pursuing many diverse avenues in becoming effective partners in the technical assistance programs. The unique roles and specialized skills of the members make them valuable resources in the development of the SBTCPs. Effective communication among the three components of the programs and among CAPs in all programs will continue to effectively and efficiently define the role of the CAP and fully maximize the skills of CAP members in assisting small businesses. The value added activities of these CAPs underscore the need for states still without operational CAPs to complete the appointment/reappointment process and initiate the CAP function.

#### 4.5 FINANCIAL ASSISTANCE PROGRAMS

Information about financial assistance programs offered to small businesses to address environmental compliance needs (e.g., capital expenses associated with pollution prevention or control equipment) is provided in Table 4-10.

| <b>TABLE 4-10<br/>FINANCIAL ASSISTANCE PROGRAMS</b> |                 |
|---|-----------------|
|   | <b>#</b>        |
| States/territories offering grants/loans            | 11              |
| Grants/loans offered                                | 16 <sup>1</sup> |
| States/territories planning grants/loans            | 2               |

Note 1: Some states/territories offer more than one financial assistance program.

Eleven states/territories (21 percent) offered 16 financial assistance programs during the 1998 reporting period. Two SBTCPs have plans to offer financial assistance programs to small businesses in the near future. This is up from 8 financial assistance programs offered by 6 states in 1996 and ten grants/loans offered by seven states in 1997. Detailed information about these financial assistance programs is provided in Appendix E-11.

Creative financing mechanisms fulfill a need conveyed to programs by small businesses; offering financial assistance was a common recommendation made for improving compliance by SBTCPs themselves. The number of states/territories that offer some type of small business financial assistance program continues to rise, albeit slowly. Programs are encouraged to explore funding opportunities for small businesses within their state or territory.

## **4.6 MINIMIZING DUPLICATION THROUGH COOPERATIVE EFFORTS**

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

### **4.4.1 Cooperative Efforts**

Information provided in this section is vital to understanding how some programs with limited budgets and resources are functioning. Generally, programs report that all three components of their SBTCPs recognize the efficiency and value of coordinating their efforts with each other and with other environmental agency departments, state agencies, and organizations. A summary of the number of SBTCP functions that cooperatively manage resources is shown in Table 4-11. Descriptions of programs' cooperative efforts may be found in Appendix E-12.

| <b>TABLE 4-11<br/>PROGRAMS THAT REPORT COOPERATIVE EFFORTS<br/>FOR SBTCP FUNCTIONS</b> |                   |                   |
|--|-------------------|-------------------|
|  | <b># Programs</b> | <b>% Programs</b> |
| SBO  | 44                | 83                |
| SBAP   | 48                | 91                |
| CAP  | 27                | 51                |

Forty-four programs (83 percent) report some level of cooperative effort to enhance the SBO function. The SBO often coordinates information development and dissemination, training, and workshops/seminars with such entities as other state agencies, Chambers of Commerce, trade associations, non-profits, universities, public utilities, and Small Business Development Centers. The overall concerns of small businesses are being taken into account, as many SBOs provide multimedia information, coordinate outreach with non-air programs, or intervene on behalf of a small business with other agencies. Some SBOs also serve in other roles within the state environmental agency.

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

Twenty-seven CAPs (51 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.

The number of programs reporting cooperative efforts has remained fairly consistent from year to year.

#### **4.6.2 Minimizing Duplication of Efforts Among SBTCPs**

All programs (100 percent) report some action to minimize duplication of efforts among SBTCPs. The sharing or exchanging of information among SBTCPs is a practical method for avoiding duplication of effort, thus increasing the overall cost-effectiveness of individual programs. As an example, industry-specific information developed by one program would have wide applicability to other programs involved with similar industries. Mechanisms that programs employ to avoid duplication of effort are presented in Table 4-12; program details for this topic are found in Appendix E-13.

| <b>TABLE 4-12<br/>SBTCP MECHANISMS FOR AVOIDING DUPLICATION</b>              |                   |                   |
|--|-------------------|-------------------|
| <b>Mechanism</b>   | <b># Programs</b> | <b>% Programs</b> |
| Communication/networking within SBTCP & state agency                         | 51                | 96                |
| Meetings, conference calls, other contacts with SBOs/SBAPs within EPA region | 51                | 96                |
| Review of EPA documents, contacts with EPA                                   | 50                | 94                |
| Information gathering from electronic sources                                | 48                | 91                |
| Review of documents from other public, private, or university sources        | 47                | 89                |
| Networking through state/regional air groups (e.g., WESTAR)                  | 43                | 81                |
| Subscribe to SBO or government ombudsman listserve                           | 26                | 49                |
| Other  | 12                | 23                |

The most common techniques(in 96 percent of programs) to avoid duplication of effort was communication and networking with SBTCP and state agency personnel via phone, mailing lists, etc. and contact with other programs within the same EPA region through conference calls and other means.

Gathering information from electronic sources, including Internet use for information transfer, continues to be one of the most promising mechanisms for avoiding duplication of effort among programs. Use of this method increased slightly in 1998 as reported by 48 programs, up from 46 in 1997 and 18 in 1996. This parallels the rise in the number of web pages available, as previously noted. Posting information from the federal SBO and SBAP, other private and university sources, and state programs facilitate efficient use of resources and would encompass all of the mechanisms to avoid duplication. Additionally, 26 programs reported subscribing to applicable listserves, a surprising decrease of four from the 30 in 1997. (A listserve is a program that allows users to mass-distribute electronic mail messages. 1997 was the first year this reporting category was solicited.)

#### **4.7 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 Office continues its outreach actions toward assisting the SBTCPs in this effort.

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

- Conducted educational activities at the EPA SBO Regional Liaison Conference, Washington, DC, August 1998.
- Provided information on statutes at the 1998 National/State SBO/SBAP Conference in Scottsdale, AZ.
- Responded to telephone hotline inquiries in regard to the three statutes.
- Distributed copies of the three statutes by request to state contacts.
- Provided states with copies of the 1996 Small Business Regulatory Enforcement Fairness Act (SBREFA), which strengthens and amends the Regulatory Fairness Act, and SBREFA Implementation Guidance documents.
- Offered information on the three statutes on the small business environmental home page.

#### **4.7.1 SBTCP Activities Associated with the Paperwork Reduction Act**

Forty-eight programs (91 percent) reported specific activities associated with the intent of the provisions of the Paperwork Reduction Act, up from 47 programs in 1997 and 32 programs in 1996. This Act was designed to minimize the burden and maximize the practical utility and public benefit associated with the collection of information by or for a federal agency.

The two most common actions taken to follow the intent of the provisions of this act were receiving/providing information electronically (75 percent of programs) and reviewing SBTCP documents for compliance (74 percent). Overall, all activity categories are showing increases as SBTCPs continue to take significant steps 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 4-13 and are detailed, by program, in Appendix E-14.

| <b>TABLE 4-13<br/>SBTCP ACTIVITIES TO FOLLOW THE INTENT OF<br/>THE PAPERWORK REDUCTION ACT</b> |                   |                   |
|--|-------------------|-------------------|
| <b>Activity</b>  | <b># Programs</b> | <b>% Programs</b> |
| Receiving/providing information electronically   | 40                | 75                |
| Routine review of SBTCP documents for compliance   | 39                | 74                |
| General permits for certain types of industries  | 34                | 64                |
| Routine review of SBTCP information collection activities                                      | 33                | 62                |
| Simplified/consolidated permits or forms   | 33                | 62                |
| Eliminating unnecessary permits by increasing exemptions                                       | 29                | 55                |
| Other  | 5                 | 9                 |

#### **4.7.2 SBTCP Activities Associated with the Regulatory Flexibility Act**

Forty-seven programs (89 percent) reported activities to follow the intent of the provisions of the Regulatory Flexibility Act during 1998, the same as in 1997 and an increase from 27 programs in 1996. The Regulatory Flexibility Act requires that when a number of regulations will have a significant economic impact on a substantial number of small

entities, "a regulatory analysis must be performed to explore options for minimizing those impacts." Those actions most often implemented are prioritized in Table 4-14.

| <b>TABLE 4-14</b><br><b>SBTCP ACTIVITIES TO FOLLOW THE INTENT OF</b><br><b>THE REGULATORY FLEXIBILITY ACT</b> |                   |                   |
|---|-------------------|-------------------|
| <b>Activity</b>   | <b># Programs</b> | <b>% Programs</b> |
| Ensure that small businesses can participate in rulemaking  | 39                | 74                |
| Routine review of SBTCP documents for compliance  | 39                | 74                |
| Periodic rule review for impact on small business   | 28                | 53                |
| Amnesty program   | 21                | 40                |
| Other   | 8                 | 15                |

SBTCPs have played a major role in ensuring awareness of the effects of regulatory requirements on small businesses as well as promoting environmental compliance in the small business community. SBTCP personnel have made significant strides in promoting the effects of legislation/regulations on small businesses to regulatory agencies through their role as mediators between these two groups. The two primary activities reported by programs in following the intent of the Regulatory Flexibility Act was ensuring that small businesses can participate in rulemaking and reviewing SBTCP documents for compliance (each reported by 39 programs). SBTCPs continue to be effective advocates of the small business perspective and have helped negotiate flexible application of regulatory requirements that provided great benefits to small businesses. Actions taken by SBTCPs in response to the Regulatory Flexibility Act, by program, may be found in Appendix E-15.

#### **4.7.3 SBTCP Activities Associated with the Equal Access to Justice Act**

Forty-one programs (77 percent) reported specific activities to follow the intent of the provisions of the Equal Access to Justice Act, up from 40 programs in 1997 and 18 programs in 1996. The purpose of this Act is to provide certain parties who prevail over the Federal government with covered litigation in an award of attorneys' fees and other expenses under appropriate circumstances. Specific actions include reviewing SBTCP documents for compliance (the most common activity, conducted by 33 programs), and reviewing instances where state actions against small businesses appear unjustified (22 programs).

SBTCP actions to follow the intent of the provisions of the Equal Access to Justice Act are shown in Table 4-15 and detailed, by program, in Appendix E-16.

**TABLE 4-15  
SBTCP ACTIVITIES TO FOLLOW THE INTENT OF  
THE EQUAL ACCESS TO JUSTICE ACT**

| <b>Activity</b>   | <b># Programs</b> | <b>% Programs</b> |
|---|-------------------|-------------------|
| Routine review of SBTCP documents for compliance                                  | 33                | 62                |
| Review instances where state actions against small businesses appear unjustified  | 22                | 42                |
| Providing funding/technical assistance for groups aggrieved by regulatory actions | 17                | 32                |
| Other   | 3                 | 6                 |



## **5.0 PROGRAM EFFECTIVENESS**

Internal and external assessments of SBTCP program effectiveness are reviewed in this section. Program goals and evaluation strategies are discussed in Section 5.1. Program highlights and accomplishments are found in Section 5.2. In Section 5.3, SBTCPs offer tips and barriers in operating their programs. Success stories and case studies are included in Section 5.4. A discussion of “comments received on SBTCPs” and “concerns or inquiries received and resolution strategies employed” are no longer included in this section; these issues have been incorporated into other questions posed to the programs.

### **5.1 PROGRAM GOALS**

At each national SBO/SBAP conference since 1995, SBTCP representatives have discussed strategies to measure the success of compliance assistance programs. With the revision of the SBTCP Reporting Form for 1998, SBTCPs were asked to define and prioritize their own program goals. They also were asked to discuss strategies to evaluate their goals and the results of this measurement process.

Programs are at different stages of development and have varying resources. Self-defined goals allow each program to strive for success and measure its achievements within its means.

Performance measurement tools can take a variety of forms from simple to sophisticated.

- Methods of tracking number of attendees at events.
- Types of numerical data collected for activities and methods of collection.
- Surveys to measure customer satisfaction after attending an event or receiving assistance.
- Surveys to determine quality of service provided or request suggestions for improvement.
- Detailed program analysis or evaluation.
- Statistical analysis of return on investment in program.

SBTCPs were asked to indicate goals for their programs, ranking them in terms of priority. Their responses are summarized in Table 5-1.

| TABLE 5-1<br>PROGRAM GOALS                          |  |  |
|---|--|--|
| Goal  | # Programs<br>Declaring Goal<br>(regardless of rank) | # Programs<br>Declaring This<br>As #1 Goal |
| Increase understanding of environmental obligations | 45   | 29   |
| Improve compliance rates                            | 42   | 15   |
| Provide site specific compliance assistance         | 30   | 1  |
| Increase understanding of permitting                | 25   | 1  |
| Increase understanding of CAA                       | 17   | 1  |
| Other   | 14   | 3  |
| Encourage self-auditing                             | 13   | 1  |

Increasing understanding of environmental obligations (45 programs, 85 percent) and improving compliance rates (42 programs, 79 percent) were the two most frequently listed goals, regardless of priority ranking. These two goals also garnered the most number one priority rankings, with 29 and 15 programs, respectively, declaring these to be their main goals.

### 5.1.1 Goal Evaluation

Importantly, programs then were asked how they evaluated whether their stated were being met. Programs were encouraged to base their assessments on quantifiable terms, where possible. Some programs, still in the developing stage, would need to rely on qualitative strategies to report their goal progress.

SBTCPs reported a variety of strategies to evaluate their program goals. These included:

- Various customer feedback mechanisms (customer satisfaction/value of service).
- Questionnaires/satisfaction surveys.
- Tallies of hotline calls, on-site visits, workshops, etc.
- Publications developed and distributed.
- Improvements in compliance rates.

Most programs focused on the number of businesses reached and types of assistance offered to measure their success.

Finally, programs were asked to describe the results of their measurement process. Many SBTCPs discussed data and client feedback related to various outreach efforts. For example:

- Montana's SBO/SBAP met its goals to provide extensive on-site assistance to the vehicle service, automobile refinishing, dry cleaning, and chrome plating sectors. Other goals were to establish a low-interest loan program and to add multimedia services; these goals were met in 1998. SBO/SBAP provided multimedia P2 assistance to each of the businesses identified by EPA's Sector Initiative and extended loans to over 20 service stations, four auto body shops, two heating/air conditioning projects and two small manufacturers to purchase energy efficient and P2 equipment.
- New York's ombudsman hotline received over 700 calls, a 45 percent increase over 1997. The ombudsman handled 71 cases in 1998, also an increase of 45 percent over 1997. The SBAP conducted 17 audits and provided site-specific assistance to these businesses. They responded to over 1,300 hotline calls ranging from routine program information to very specific technical assistance. They provided permitting assistance, completing 14 state facility permits and 52 minor facility registrations. SBAP also helped 71 businesses reply to a mass mailing from the state regulatory agency, which brought them into compliance with the permitting regulation and prevented them from being classified as significant violators in the future.
- Wyoming's Outreach Office notes the following successes in meeting their goals:
  - Provided information on environmental statutes and regulations in over 20,000 newsletters to small businesses in the state.
  - Offered compliance assistance and P2 initiative support to over 500 small businesses in one-on-one site visits.
  - Encouraged self-auditing through both policy formulation (compliance incentive rule advocated by the CAP and adopted by the Department) and education via newsletter, handout information at public displays and presentations, and in one-on-one site visits totaling thousands of individual contacts.
  - Increased the public's understanding of permitting requirements and CAA through publications, presentations, and site visits totaling thousands of individual contacts.

Hard data linking these accomplishments to improved compliance are not currently available. The program, however, believes its efforts are bearing fruit in many of the businesses contacted. Wyoming is committed to working not just with the regulated community, but also with the numerous small businesses that do not require permits; the latter, in combination, can have significant impacts on the environment.

Arizona, Florida, and Texas measured improvements in compliance resulting from their technical assistance efforts.

- In Arizona, on-site visit evaluations, including changes in compliance, are conducted during a follow-up visit 60 days after the facility receives its report. Over 70 percent of violations detected during the initial visit had been corrected by the time of the follow-up visit. Issues not corrected usually are complex or require significant capital expenses.
- Florida's dry cleaner workshops were used to create PERC awareness. PERC reductions were achieved, but compliance with recordkeeping and reporting remained low. Dry cleaner calendars were created that enabled businesses to easily enter data on their calendars. They could tear off and send in the information sheet each month to meet compliance requirements.

In 1996, the average compliance rate for recordkeeping was 12 percent. In 1998, recordkeeping and reporting increased to 73 percent. From 1996 to 1998, a 61 percent increase in compliance was achieved directly due to calendar distribution.

- Texas measures compliance before and after assistance is provided through questionnaires, and customer assistance surveys for hotline calls, site visits, and workshops. For 1998, SBAP met its program goals of 90 percent compliance for most industries. Additional outreach will be conducted for industries whose compliance rates were below 90 percent. The measurement system was successful, as it showed the industries for which outreach was successful, the types of outreach that were effective, and where further outreach is needed.

Individual program goals and their priority rankings, goal evaluation strategies, and results of this measurement process may be found in Appendix F-1.

## **5.2 PROGRAM HIGHLIGHTS AND ACCOMPLISHMENTS**

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

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

In this section, key accomplishments are highlighted based on the frequency in which they were mentioned. An overview of program accomplishments and highlights for 1998 are provided in Appendix F-2.

1. Forging partnerships with other organizations and agencies was mentioned by 21 programs (40 percent) as being a significant accomplishment.
  - California's Air Resources Board initiated a facilitated workshop in cooperation with the California Trade and Commerce Agency to improve small business access to financial resources.
  - Illinois implemented a pilot project combining the resources of the SBAP, IEPA Office of P2, SBDCs, Procurement Technical Assistance Center, and Manufacturing Extension Center. Companies can receive free P2 assessments from a graduate student intern.
  - Minnesota's SBAP coordinated with external service providers to develop an environmental guide for small businesses. The free guide includes comprehensive multimedia information on all environmental regulations with which small businesses need to comply.
  - Nebraska is developing an ever increasing network of partners and peer exchange businesses. Large businesses and consulting firms are taking a more proactive role in working with small businesses to expand the assistance outreach.
2. Seventeen programs (32 percent) reported work on multimedia projects or moving their whole assistance program to multimedia leadership. This is up from nine programs in 1997.
  - In June 1998, Connecticut's SBAP was moved into the Commissioner's Office to coordinate multimedia compliance assistance efforts. While the Office is still dealing predominantly with small business activities, other activities and responsibilities also have been included.
  - Mississippi's program has made the move to multimedia, and it is working well. Customers expect staff to have knowledge in all areas. Through these multimedia efforts, customers have one point of contact to get a variety of questions answered.
  - In Pennsylvania, as of December 1, 1998, the technical assistance program known as AIRHELP expanded to include solid waste, hazardous waste, P2, energy efficiency, and environmental management systems as well as air quality. The new program is called ENVIROHELP.
  - Virginia's SBAP has been relocated into a new division within DEQ -- the Pollution Prevention and Compliance Assistance Division. One result of this move is the increased opportunity to provide multimedia assistance with the hopeful addition of resources.
3. Fourteen programs (26 percent) were pleased with the publication of various documents.
  - Florida developed a dry cleaners' compliance assistance calendar.
  - Indiana published a vehicle maintenance compliance manual that includes environmental, OSHA, and fire and building services regulations.

- Maryland prepared the Business Guide to Environmental Permits and Approvals, which lists information for all permits, approvals, and licenses issued by the Department. This document is very useful to businesses and is available on the MDE web site.
  - New Jersey's SBAP worked in conjunction with EPA, trade/business groups, and chemical manufacturers on the NJ Chemical Industry Project, which developed compliance assistance materials for medium and small businesses both as hard copy and on line.
4. Improved synergy between the regulatory agency and small business was noted by 13 programs (25 percent).
- In Hawaii, a statewide dry cleaning technical assistance program was designed and established with the concurrence and support of industry.
  - Michigan's SBAP trained more than 1,800 business, industry, regulatory, and consulting personnel during 1998 at 18 workshops held statewide. SBAP also provided a number of presentations to business, industry, and government personnel, attracting a listening audience of 1,274 at 15 engagements. The technical assistance provided or customer service displayed is reflected in nine letters of appreciation from industry or other state government agencies commending SBAP staff on the excellent level of technical assistance that was provided.
  - New Hampshire's program continues to be well received by the small business community. An ever increasing majority of referrals for technical assistance are through conversations between business owners. This is primarily due to the conscious attempt by program staff to break down the barriers of mistrust that often exist between business owners and regulatory agencies.
  - One of North Carolina's primary accomplishments in 1998 was to strengthen links with the Department of Commerce and local economic developers and to improve our multimedia response capability. The SBO works with all permitting agencies and business representatives to facilitate a new company's understanding of environmental requirements.

Other accomplishments mentioned less frequently include permitting and compliance assistance, pollution prevention initiatives, and sponsoring or making presentations.

### **5.3 TIPS AND BARRIERS**

At the request of the SBTCPs, a new section was added to the Reporting Form for sharing tips or barriers first developed or recognized by a program. Thirty programs (57 percent) shared their suggestions. The three most commonly suggested tips, of the many that were offered, were:

1. Maximize communication with other agencies (9 programs/17 percent).
  - Louisiana suggests cooperation with the surveillance section as key to assisting small businesses with notices of violations.
  - Ohio encourages a working relationship with the state's inspectors and permit processors, since they are the only state environmental agency people that a business is likely to deal with directly. Have the SBAP staff visit district inspectors and go on inspections with them.
2. Forge partnerships (7 programs/13 percent).
  - Kansas is trying to work with trade associations and local programs more effectively by piggybacking on existing programs or events. For example, Kansas provided a workshop in conjunction with the national screenprinters' teleconference to provide additional state-specific information and to answer questions.
  - Washington's state agencies cooperated in a series of "fugitive dust control for construction sites" seminars given for industry.
3. Provide a sector-specific message (4 programs/8 percent).
  - Iowa has found that generic guidance materials, workshops/seminars, etc. are not very effective for "typical" small businesses. Targeted and detailed specific information is better received and is more useful.
  - New Hampshire recommends developing state- and sector-specific compliance/ best management practices manuals as an optimum way to foster compliance. The manuals must be as narrowly focused as possible, as small business owners do not have time to determine if something is applicable or not.

Less frequently mentioned tips include:

- Maintain and update web site.
- Adopt Rules of Customer Service.
- Schedule evening workshops for the convenience of small businesses.
- Promote CAP appointments and reappointments.

SBTCPs also were asked to identify barriers to their work. The three most commonly mentioned were:

1. CAP appointments (4 programs/8 percent).
  - CAP appointments in Florida are legislatively mandated, but do not establish a service term. This creates a difficult situation when CAP members do not participate yet want to "stay on" the CAP.

- North Carolina reports significant problems in getting timely appointments of CAP members. The specific problems for minority and majority legislative appointments, the turnover in executive staff, and appointments to a purely advisory body have created problems. A mandated advisory body with broad-based membership -- not necessarily through the appointment process -- may be a better solution.
2. Lack of resources and staff training (3 programs/6 percent).
- The District of Columbia's program will be better run when there is a dedicated full-time person who can develop and implement a plan for the program. For the program to achieve its goals, the three program components must be in place and operational, which is not the case for DC.
  - Virginia has found that resource constraints have hampered their program's ability to provide on-site compliance assessments, which are seen as a most essential element of providing credible compliance assistance.
3. Lack of authority to go multimedia (3 programs/6 percent).
- Oregon's program needs to be multimedia to be more effective. DEQ's current organization prevents this from happening. The SBTCP is exploring the possibility of a multimedia technical assistance program. Funding seems to be one of the biggest barriers.
  - Rhode Island reports that one major barrier to its program is the state's Operating Permits Commission. This Commission was created by the state's Office of Air Resources to solicit funding for salaries that are paid out of the Operating Permits Program. Since the SBAP is funded by Operating Permit Fees, the members of this commission prefer that the SBAP only perform air assistance. Since the SBAP is an assistance program, it responds to the needs of small businesses on all media issues. The SBAP feels it is impractical not to respond to other small business environmental needs.

A complete list of each program's tips and barriers may be found in Appendix F-3.

## **5.4 SUCCESS STORIES AND CASE STUDIES**

Another new addition in the 1998 Reporting Form is the request for success stories and case studies. These can serve as strong examples of a program's effectiveness and provide insight and inspiration to other small businesses and SBTCPs. Twenty-eight programs (53 percent) shared their success stories or case studies.

Several success stories are included below. Success stories and case studies from all programs may be found in Appendix F-4.



- In Hawaii, a farmer seeking to obtain an agriculture burning permit to dispose of waste that he “inherited” on land recently leased from the State of Hawaii sought assistance from the SBO. The SBO negotiated a waiver of lease rent with the state land agency for the farmer, which was equivalent to the cost of collection, transport, and disposal of non-agricultural waste (e.g., plastic nursery pots, treated lumber, tires, and wrecked autos) from the previous tenants. The farmer was not required to segregate non-combustible items from his burn pile. The farmer did not incur waste disposal costs for that which he was not responsible. The state land agency treated a new lessee fairly and ensured that waste was appropriately cleared from its land, without incurring new costs. The air program demonstrated flexibility in its administration of the agricultural burning permit.
- In Louisiana, a cultured marble manufacturer, an employee-owned company of 18 people, contacted the Louisiana SBAP after receiving an EPA mailing about obtaining an air quality permit for styrene emissions. The SBAP engineer met with the company president to determine what needed to be done. “The cost savings to the company were considerable, because we didn’t have to hire a consultant to do the work,” said the president. He also said he feels more at ease knowing that the company avoided enforcement actions by obtaining the correct air permit.
- The Massachusetts auto body project generated simplified regulatory information by using the “good faith” rationale for penalty mitigation. Working with a trade association, Massachusetts SBAP produced the manual, “Crash Course,” which constitutes an agreement between the federal and state environmental enforcement agencies defining what an inspector will look for when visiting an auto body facility. Information is offered to help an auto body shop owner/operator know what to do to comply with basic requirements. Included are a simple version of the rules, pollution prevention tips, strategies to protect worker health, and documentation tools so that the shop can show an inspector how key activities occur. The shop can benefit from this demonstration of good faith if any penalties are assessed. Using the “good faith” policy allows regulatory simplification without any regulatory promulgation.
- The Montana SBO/SBAP created the Small Business and Tribal Energy and Environmental Loan Program to provide low-interest loans to small businesses and tribal entities to purchase energy efficient and pollution prevention equipment. The loan program kept over a dozen small, rural service stations from going out of business as a result of the underground storage tank regulations.
- A trailer manufacturing company in Nebraska switched to a new type of plasma cutter, which allowed them to cut aluminum more quickly and accurately. However, the aluminum oxide waste from the cutter was very fine, and when mixed with water, became unstable. Faced with possible hazardous waste disposal expenses, the company called the NE SBAP.

Upon visiting the trailer company, the SBAP determined that the company would generate over 55 gallons of aluminum oxide powder daily. Through a network of scrap dealers and other companies that cut aluminum, the SBAP found a company in Illinois that would take all the aluminum oxide that the trailer company could produce. The trailer manufacturer now is considering adding a second plasma cutter to increase production.

- The New York Small Business Environmental Ombudsman (SBEO) negotiated a policy with the NY Department of Environmental Conservation in which dry cleaners could voluntarily come forward to the DEC and sign consent orders to come into compliance with the vapor barrier requirement of the new dry cleaning regulation. Many dry cleaners had missed a deadline to build a vapor barrier enclosure around their dry cleaning equipment due to a variety of reason. The DEC allowed dry cleaners operating third generation machines who had missed their deadline, and who had a signed contract with a vapor barrier installer, to voluntarily comply by signing consent orders with a suspended penalty. Over 300 dry cleaners took advantage of the consent order option.
- In Ohio, a one-person company that makes lead castings was inspected by District Office staff, who maintained the company was a “secondary lead smelter,” determined large potential emissions based on smelting emission factors, and deemed the company in violation for not having an air permit. The SBAP visited the company and learned the operation was not secondary lead smelting, but was exempt from permitting due to low emissions that were calculated using the appropriate non-smelting emission factors. The SBAP, on behalf of the company, successfully argued this point to the District Office and Prosecutor’s Office; the charge of failure to obtain a permit was dropped.
- In Texas, Lancaster Furniture focused on reducing their volatile organic compounds (VOC) emissions with the help of TNRCC. The company invested \$8,000 for more efficient high-volume, low-pressure spray guns and related equipment and trained employees in their proper use. VOC emissions dropped from just under 25 tons in 1996 to 16 tons in 1998, while annual expenditures on paints and coatings fell from \$69,000 to \$35,000.

## **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. Compliance issues in particular industry sectors are identified in Section 6.2. Recommendations to facilitate compliance are outlined in Section 6.3. Program confidentiality issues are outlined in Section 6.4. Finally, in Section 6.5, information is provided on the use of EPA's Small Business/Small Communities Policy. The section on improvements in regulatory understanding and compliance does not appear this year, as this information has been captured in other sections when the Reporting Form was revised.

### **6.1 COMMON COMPLIANCE PROBLEMS**

All SBTCPs provided insight on the types of compliance issues addressed during the course of providing technical assistance to small businesses. Common compliance problems, listed by decreasing occurrence for 1998, are shown in Table 6-1 and are compared with responses from 1997 and 1996; responses for 1998 are detailed, by program, in Appendix G-1.

**TABLE 6-1  
COMMON COMPLIANCE PROBLEMS**

|   | 1998       |            | 1997       |            | 1996         |              |
|---|------------|------------|------------|------------|--------------|--------------|
| Compliance Problem  | # Programs | % Programs | # Programs | % Programs | # Programs   | % Programs   |
| Not understanding regulatory requirements   | 51         | 96         | 49         | 92         | 28           | 53           |
| Incomplete recordkeeping  | 48         | 91         | 42         | 81         | 16           | 30           |
| Fear of arbitrary regulatory enforcement/regulatory agency                                | 46         | 87         | 42         | 81         | 6            | 11           |
| Uncertain how to determine emission inventories/lack of technical expertise               | 45         | 85         | 45         | 85         | 12           | 23           |
| Uncertain how to complete forms/complicated paperwork                                     | 42         | 79         | 44         | 83         | 10           | 19           |
| Operating without a permit  | 42         | 79         | 39         | 74         | 26           | 49           |
| Uncertain of permitting requirements  | 42         | 79         | 37         | 70         | 14           | 26           |
| Improper storage/disposal of hazardous waste  | 25         | 47         | 29         | 55         | 7            | 13           |
| Financing for pollution control requirements  | 24         | 45         | 31         | 58         | 10           | 19           |
| Operating outside NSPS or MACT  | 22         | 42         | 23         | 43         | 10           | 19           |
| Failure to use or finding proper equipment/technology to comply with applicable standards | 18         | 34         | 12         | 23         | 6            | 11           |
| Other   | 5          | 9          | 5          | 9          | Not reported | Not reported |

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

## 6.2 COMPLIANCE PROBLEMS IN PARTICULAR INDUSTRY SECTORS

In addition, as a new element for 1998, programs were asked to indicate if certain compliance problems were prevalent in any particular industry sector. Nineteen programs (36 percent) indicated at least one industry sector. Their responses are summarized in Table 6-2 and shown in full in Appendix G-1.

**TABLE 6-2  
COMPLIANCE PROBLEMS IN INDUSTRY SECTORS**

| <b>Compliance Problem<br/>(# industry sectors mentioned)</b> | <b>Industry Sector Specified<br/>(# programs indicating this sector)</b>   |
|--|--|
| Not understanding regulatory requirements (8)                | Dry cleaners (3)<br>Auto maintenance shops (3)<br>Gas stations (1)<br>Small/medium businesses (1)<br>Metal finishers (1)<br>Dehydrators (1)<br>Dairies (1)<br>Surface coaters (1)  |
| Operating without a permit (10)                              | Paint booths (1)<br>Auto degreaser (1)<br>Dry cleaners (1)<br>Aquaculture (1)<br>Surface coaters (1)<br>Toxics use (1)<br>New York City sources with city-only permit (1)<br>Small businesses (1)<br>Metal finishers (1)<br>Auto (1) |
| Incomplete recordkeeping (9)                                 | Dry cleaners (10)<br>Paint booths (1)<br>Small/medium businesses (1)<br>Foundries (1)<br>Surface coaters (1)<br>Auto body (1)<br>Dairies (1)<br>Printers (1)<br>Metal finishers (1)  |
| Uncertain of permitting requirements (3)                     | Aquaculture (1)<br>Dairies (1)<br>Metal finishers (1)  |
| Uncertain how to determine emission inventories (3)          | Auto body (1)<br>Surface coaters (1)<br>Dry cleaners (1)   |
| Uncertain how to complete forms (4)                          | Dry cleaners (2)<br>Vehicle maintenance (1)<br>Small/medium businesses (1)<br>Surface coaters (1)  |
| Lack of financing (4)  | Gas stations (1)<br>Auto body (1)<br>Sandblasters (1)<br>Surface coaters (1)   |
| Operating outside NSPS/MACT (3)                              | Dry cleaners (3)<br>Plating (1)<br>Furniture manufacturing (1)   |
| Improper storage of hazardous waste (3)                      | Vehicle maintenance (1)<br>Manufacturing (1)<br>Metal finishing (1)  |
| Fear of regulatory agency (6)                                | Dry cleaners (2)<br>Vehicle maintenance (2)<br>Metal finishing (2)<br>Small businesses (1)<br>Printers (1)<br>Surface coaters (1)  |
| Failure to use proper equipment (3)                          | Gas stations (1)<br>Degreasers (1)<br>Surface coaters (1)  |

Of the 11 categories of compliance problems, the number of categories in which a particular industry sector appears is shown in Table 6-3.

| <b>TABLE 6-3</b><br><b>INDUSTRY SECTOR APPEARANCE IN COMPLIANCE CATEGORIES</b> |   |
|--|---|
| <b>Industry Sector</b>   | <b># of Compliance Problem Categories</b> |
| Surface coaters  | 8   |
| Dry cleaners   | 7   |
| Metal finishers  | 7   |
| Auto maintenance shops   | 5   |
| Small/medium businesses  | 5   |
| Gas stations   | 3   |
| Auto body shops  | 3   |
| Dairies  | 3   |
| Paint booths   | 2   |
| Auto degreaser   | 2   |
| Aquaculture  | 2   |
| Printers   | 2   |
| Dehydrators  | 1   |
| Toxics use   | 1   |
| New York City sources  | 1   |
| Foundries  | 1   |
| Sandblasters   | 1   |
| Furniture manufacturers  | 1   |
| Manufacturing  | 1   |

Surface coaters appear in eight compliance problem categories. Dry cleaners and metal finishers closely follow, each appearing in seven categories. Interestingly, printers have received a strong level of technical assistance from many of the Section 507 programs in the past several years; this sector appears in only two compliance problem categories, implying that technical assistance efforts are working.

### 6.3 RECOMMENDED CHANGES TO FACILITATE SMALL BUSINESS COMPLIANCE WITH THE CAA

Recommendations made by SBTCPs for changes, at the state or federal level, to help small businesses comply with the CAA are summarized in Table 6-4. SBTCP staff members are uniquely qualified to make such recommendations, since they address current CAA compliance problems encountered by small business and attempt to provide effective solutions. Specific program responses may be found in Appendix G-2.

| <b>TABLE 6-4<br/>1998 SBTCP RECOMMENDATIONS FOR IMPROVING COMPLIANCE</b>     |                   |                   |
|--|-------------------|-------------------|
| <b>Recommendation</b>  | <b># Programs</b> | <b>% Programs</b> |
| Allow flexibility/simplification in applying regulations to small businesses | 13                | 25                |
| Increased funding/continued adequate funding for SBTCPs                      | 12                | 23                |
| Simplify paperwork/reporting requirements                                    | 9                 | 17                |
| Multimedia assistance  | 8                 | 15                |
| Regulations written in plain English   | 6                 | 11                |
| Grants/loans for small businesses  | 6                 | 11                |
| Generic outreach and training materials                                      | 5                 | 9                 |
| Expand/facilitate effective communication between state and federal agencies | 5                 | 9                 |
| Clean and simple audit privileges/voluntary disclosure policies              | 4                 | 8                 |
| Develop a national public relations/advertising program                      | 3                 | 6                 |
| Develop compliance incentives  | 2                 | 4                 |

Forty programs (75 percent) provided at least one recommendation for changes to improve small business compliance with the CAA. While priority of responses for 1997 parallel those of 1996, 1998 saw a few subtle shifts with the exception of the number one recommendation.

Allowing flexibility and simplification in applying regulations to small businesses was mentioned by 13 programs (25 percent) as being the prime recommendation for improving compliance. Another common recommendation, mentioned by 12 programs, was for continued and increased funding for the state SBTCPs (ranked third last year and second

this year). As previously noted, a number of states operate with limited budgets and staffs. The personalized approach to technical and compliance assistance has been shown to be effective in reaching the small business community, and 23 percent of state programs believe that adequate financial resources are vital to continued and expanding high quality service.

The third most common recommendation stressed by 9 programs (17 percent) called for simplifying paperwork and reporting requirements, a suggestion that mirrors the top recommendation. Simplifying paperwork was ranked in a tie for sixth last year, and moves to third this year.

#### **6.4 PROGRAM CONFIDENTIALITY AND CONFLICT OF INTEREST**

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

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

Forty-eight programs (91 percent) reported no problems with COI or confidentiality issues regardless of whether a confidentiality policy is in place. One program (Alabama) did not respond to the question, two programs indicated the question was not applicable (Maryland and South Dakota), one program has not yet addressed this issue (Puerto Rico), and one program indicated that COI is unavoidable (District of Columbia).

Responses to this question have remained consistent from year to year. SBTCPs consistently report that, for the most part, COI and confidentiality are non-issues in operating their programs.

Program structures range from guaranty of confidentiality (more common) to providing no confidentiality. For example, assistance programs may be housed in non-regulatory departments, or a program may refer a business in need of technical assistance to such a provider that will guaranty confidentiality. Most programs provide for confidentiality of trade secrets. Many programs have policies that protect small businesses from penalties



if violations are discovered during the course of their receiving technical assistance. Program responses to the issue of COI and confidentiality may be found in Appendix G-3.

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

- In Arizona, existing policies, strong support from the Director of ADEQ, and good working relationships with the programs have done a great deal to maintain our credibility as a source of assistance that can be used without risk of exposure. Arizona's program does not advertise confidentiality. Before they conduct a site visit, they inform the business that the resulting report will not be confidential. Enforcement personnel have better things to do than comb through files for businesses that are already taking steps to voluntarily come into compliance.
- The District of Columbia's SBAP is solely staffed by a permit engineer/inspector who can recommend or carry out an enforcement action. In this situation, conflict of interest is unavoidable.
- Indiana's Compliance and Technical Assistance Program (the SBAP), which is part of IDEM (the regulatory agency), operates under strict confidentiality as mandated by state statute. The statute prohibits program staff from revealing confidential information to personnel in the agency or to the public unless the client specifically waives confidentiality, or if there is a clear and immediate danger to public health or the environment. Working effectively within IDEM's regulatory offices is sometimes difficult, because the strict confidentiality policy can hinder communication or coordination of efforts.
- The program in Iowa is funded by the Iowa Air Quality Bureau. Contract terms stipulate disclosure of the program's client information to the AQB if such information is requested. Unless specifically requested (very rarely), no client information is volunteered to the regulatory agency. Program clients are told that "confidentiality" does not exist with the SBAP.
- Utah uses the EPA's policy as a model for compliance incentives for small business, which was issued May 20, 1996..

## **6.5 USE OF EPA'S SMALL BUSINESS/SMALL COMMUNITIES POLICY**

As the final new reporting element for 1998, programs were asked if they used EPA's Policy on Compliance Incentives for Small Businesses (Small Business Policy) or a comparable state policy for small businesses/small communities. EPA's Small Business Policy, signed May 20, 1996, provides incentives to small businesses to participate in on-site compliance assistance programs and to conduct environmental audits. Under this policy, EPA will eliminate civil penalties provided the small business satisfies certain criteria.

Very few states are making use of EPA's policy or developing their own, as shown in Table 6-5.

| <b>TABLE 6-5<br/>SMALL BUSINESS/SMALL COMMUNITY POLICY USE</b> |   |  |
|--|---|--|
| <b>Policy Use</b>  | <b>Small Business Policy Act<br/># / % programs</b> | <b>Small Community Policy Act<br/># / % programs</b> |
| Uses EPA policy  | 5 / 9%  | 0  |
| Developed state policy   | 11 / 21%  | 2 / 4%   |
| Uses both EPA and state policy                                 | 2 / 4%  | 0  |
| NA/NR/Not used/None  | 35 / 66%  | 51 / 96%   |

For both small businesses and small communities, SBTCPs then were asked to list:

- The number of small entities qualifying under the policy.
- The number of small entities attempting to use the policy; still under consideration.
- The number of small entities attempting to use the policy, but not qualifying.
- Total dollar amount of penalties reduced.

Program responses are summarized in Table 6-6 and are shown in full in Appendix G-4. All references to small entities are for small businesses; programs did not report any use of the Small Communities Policy.

| <b>TABLE 6-6<br/>SMALL BUSINESS POLICY ACTIVITIES</b>                |  |  |
|--|--|--|
| <b>Policy Activities</b>   | <b>Programs Using Policy<br/># of entities</b> | <b># Programs Indicating<br/>NA/NR/None/Not used</b> |
| Small businesses qualifying under the policy                         | ME - 1<br>MT - 7<br>TN - 12<br>WY - several    | 49   |
| Small businesses attempting to use policy; still under consideration | ME - 0<br>MT - 0<br>SC - 1<br>TN - 12          | 49   |
| Small businesses attempting to use policy, but not qualified         | ME - 0<br>MT - 1<br>NY - 1<br>TN - 1           | 49   |
| Total \$ amount penalties reduced                                    | ME - unknown                                   | 52   |

While the Small Business/Small Entity Policy seemingly has had little use, programs likely are not yet tracking such statistics, as evidenced by the high number of programs not answering this question.

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## **APPENDIX A**

### **1998 ANNUAL REPORTING FORM**

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

**ANNUAL REPORTING FORM  
FOR THE PERIOD 1/1/98 TO 12/31/98**

**OMB NO.: 2060-0337  
EXPIRATION DATE: 9/30/01**

**\*\*\* Completed forms are due by February 15, 1999 \*\*\***

Enclosed is a blank copy of the Annual Reporting Form for the State Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP) under the Clean Air Act (CAA) as amended in 1990. This Form covers information from January through December 1998 and requests information on each of the three components of the SBTCP:

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

As you complete this Form, please remember that we are collecting objective information on each SBTCP. This report is not an evaluation of your program. For your convenience, we provided electronic copies of the Form in WordPerfect (SBTCP.WPD) and Microsoft Word (SBTCP.DOC).

**INSTRUCTIONS FOR COMPLETING THIS FORM**

1. Please complete the electronic version of the Form. If you need additional space for your answers, enlarge the boxes provided for your responses. Do not answer questions by referring to attached documents or a previous SBTCP report.
2. You should already collect the information requested on this Form. However, if a question asks for data you do not have, please provide a brief explanation of why it is not available. For future reports, you may need to revise the statistics that you track.
3. Once you have completed the Form, please return the disk and a completed hardcopy of the Form in the enclosed, pre-addressed mailer. If this mailer is missing or if you wish to use your own envelope, please return the disk and hardcopy to:

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

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

**WHAT IF I HAVE QUESTIONS?**

If you have any comments or questions for how to improve this Form, please call the U.S. EPA Small Business Ombudsman (EPA SBO) at the numbers listed below. You can reach the SBO Monday through Friday from 8:30 a.m. to 5:00 p.m. (EST). After these hours, you can leave a message on the answering machine, which is connected to the toll-free 800 number.

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

## **WHY IS EPA REQUESTING THIS FORM?**

As part of the CAA, the U.S. Congress required that each state and territory establish a Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP) to help small businesses comply with this Act. As part of its reporting requirements to Congress, EPA includes information about the SBTCP programs using information you provide on this Form. EPA has given the responsibility for this report to its SBO, who uses this Form as a standard information collection tool.

## **SUGGESTIONS FOR COMPLETING THIS FORM**

- Gathering information for this report is definitely a team effort! Enlist the help of key contacts from the SBO, the SBAP, and the CAP, and ask them to complete applicable sections.
- One person should take responsibility to complete and submit this Form (most likely the SBO).
- Refer to last year's Report to Congress and the information you provided on your Reporting Form last year when completing this year's Reporting Form.

## SECTION 1 SOURCE OF THE INFORMATION

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

**1.1 Name of state, territory, or local agency for which this report is being submitted.**

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

*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, and also a telephone extension if appropriate.*

|  | PRIMARY CONTACT | ALTERNATE CONTACT |
|--|-----------------|-------------------|
| <b>Name</b>                                  |                 |                   |
| <b>Title</b>                                 |                 |                   |
| <b>Relationship to SBTCP</b>                 |                 |                   |
| <b>Organization</b>                          |                 |                   |
| <b>Address</b>                               |                 |                   |
| <b>Address</b>                               |                 |                   |
| <b>City, State, Zip</b>                      |                 |                   |
| <b>Telephone Number</b>                      |                 |                   |
| <b>Facsimile Number</b>                      |                 |                   |
| <b>E-mail</b>                                |                 |                   |
| <b>Hotline (national? state? toll free?)</b> |                 |                   |
| <b>Internet home page</b>                    |                 |                   |

## SECTION 2 STATUS, BUDGETS, STAFFING, ORGANIZATION

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

### STATUS

#### 2.1 When was your SBTCP established?

*Please note that in Question 2.2, we are asking when each component of your SBTCP was 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 of appointment; for the SBAP, indicate the date it began providing assistance to small businesses; and for the CAP, indicate the date of the first meeting -- even if not all members of the CAP were appointed by the time of the first meeting.*

| SBTCP Component | Month and Year Operations Began |
|-----------------|---------------------------------|
| SBO             |                                 |
| SBAP            |                                 |
| CAP             |                                 |

### BUDGETS

#### 2.3 Please provide summary information on the funding for each component of your SBTCP (for the period January through December 1998). 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 of sources.*

*These budgets should include direct salaries, fringe benefits, materials & supplies, etc. To keep it simple, please round your budgets to the nearest \$100.*

*If budgets are combined for 2 or for all components of your program, please indicate.*



|       | 1998 BUDGET (\$) | SOURCE OF FUNDING (please describe) |
|-------|------------------|-------------------------------------|
| SBO   |                  |                                     |
| SBAP  |                  |                                     |
| CAP   |                  |                                     |
| TOTAL |                  |                                     |

**2.4 What was your SBTCP's budget in 1997? What is the expected SBTCP budget during the next reporting period (January through December 1999)?**

*As with the previous question, please round all numbers to the nearest \$100. If these programs did not exist (or were not active) in 1998, please indicate. Also, please indicate if any program budgets are combined.*

|       | 1997 BUDGET (\$) | 1999 PROJECTED BUDGET (\$) |
|-------|------------------|----------------------------|
| SBO   |                  |                            |
| SBAP  |                  |                            |
| CAP   |                  |                            |
| TOTAL |                  |                            |

**2.5 Briefly describe any significant changes of more than 10% in the level of funding between the 1997, 1998, and 1999 annual budget periods.**

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

|  |
|--|
|  |
|--|

## STAFFING

*With these questions, we want to know how many people support each component of your SBTCP.*

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

*Please complete this question for the staffing levels that are current as of December 1998. An FTE is considered to work 40 hours/week. For example, 2 people working 20 hours/week would be equivalent to 1 FTE. It is possible that the SBO has other responsibilities and does not perform this function on a full time basis. For example, if they perform this function approximately 20 hours/week (or 50% of their time), this would be equivalent to an 0.5 FTE.*

| SBO Function | Number of FTEs |
|--------------|----------------|
| SBO          |                |
| Other staff  |                |
| TOTAL STAFF  |                |

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

*Please complete this question for the staffing levels that are current as of December 1998. Use the same definition for an FTE as discussed in Question 2.6. We want to know if the programs use unpaid volunteers as well as "retired engineer" programs (or their equivalent) to support the SBAPs.*

| <b>SBAP Staff</b>        | <b>Number of FTEs (including retired engineers, paid or unpaid)</b> |
|--------------------------|---|
| <b>Paid</b>              |   |
| <b>Unpaid Volunteers</b> |   |
| <b>TOTAL STAFF</b>       |   |

| <b>Retired Engineers</b>       | <b>Number of FTEs</b> |
|--------------------------------|-----------------------|
| <b>Paid</b>                    |                       |
| <b>Unpaid Volunteers</b>       |                       |
| <b>TOTAL RETIRED ENGINEERS</b> |                       |

**2.8 How many people are currently serving on your CAP?**

*Please indicate how many people have been appointed to your CAP as of December 1998. Please indicate each CAP member's affiliation (i.e., small business, state regulatory agency, general public, etc.)*

*If appropriate, indicate the number of people who have not been appointed to your CAP as of December 1998.*

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

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

## ORGANIZATION

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

*Please indicate if the component is located in a regulatory agency, another agency, a university, etc. For example, in some programs, the SBAP is in 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). Please indicate if the administrative location is regulatory or nonregulatory. Generally, the CAP is independent and is located outside of all agencies, with each individual appointed as defined in Section 507. If your SBAP is contracted to an outside organization, please complete Question 2.11.*

| SBTCP COMPONENT | BRIEF DESCRIPTION OF ADMINISTRATIVE LOCATION | REGULATORY OR NONREGULATORY ? |
|-----------------|--|-------------------------------|
| SBO             |  |                               |
| SBAP            |  |                               |
| CAP             |  |                               |

### 2.10 Has management of all or part of the SBAP been contracted to an outside organization?

*If YES, please complete Question 2.11.*

|     |  |
|-----|--|
| YES |  |
| NO  |  |

### 2.11 What is the outside organization that is operating your SBAP?

|   |  |
|---|--|
| SBAP Contractor                                 |  |
| Address   |  |
| City, State, Zip                                |  |
| Telephone Number                                |  |
| Facsimile Number                                |  |
| Project Manager (or principal point of contact) |  |
| 1998 Budget                                     |  |
| Term of Contract                                |  |
| Portion of Program Under Contract               |  |

**2.12 Does your program offer air-only assistance, or has your program moved into multimedia assistance?**

|                   |  |
|-------------------|--|
| <b>Air only</b>   |  |
| <b>Multimedia</b> |  |

## SECTION 3

### SERVICES PROVIDED/ACTIVITIES CONDUCTED

**3.1 Briefly describe the assistance services of your SBO and SBAP. What is the number of eligible facilities, by industry sector, that your program assisted in 1998?**

*We are interested in compiling statistics on the types of assistances and number of businesses reached, by industry sector, through a variety of assistance services by the SBO and SBAP combined.*

*To help you in completing this question, the following tables are provided.*

- *In Table A, please list the number of each type of service offered and the number of businesses reached, by industry sector, through various outreach activities. If you only know the total businesses reached per industry sector, please indicate this number in the "total" column in the right side of the table. If you only have information on the total number of businesses reached by various types of outreach activities, please indicate this in the "total" row at the bottom of the table.*

*If multiple industry sectors were reached by a particular outreach activity (for example, a permitting training program that was relevant to any industry sector), please place this information in the "cross sector" category.*

*If you only track whether these activities occurred (and not the specific number of occurrences), please simply "check" the appropriate column.*

*The number(s) next to each industry sector is its 2-digit (major group) or 3-digit (industry group) SIC code.*

- *In Table B, please indicate the total number of each type of assistance requests you receive by CAA requests and multimedia requests.*

*Please note that the options for the types of services have been limited. Please classify the services you offer into one of these categories. If no category is suitable, you can use the "Other" category. You do not need to define what you have placed in the "Other" category. The Report to Congress will reflect only these categories.*

**NOTE:** *An eligible facility is defined as a stationary source that:*

- *Is owned and operated by a person that employs 100 or fewer individuals.*
- *Is a small business concern as defined by the Small Business Act.*
- *Is not a major stationary source.*
- *Does not emit 50 tons or more per year of any regulated pollutant.*
- *Emits less than 75 tons per year of all regulated pollutants.*

**Please indicate number of each type of service offered and the number of businesses reached for each relevant industry sector (# services/#businesses reached).**

| TABLE A  |         |              |                     |              |           |                |          |       |                          |
|--|---------|--------------|---------------------|--------------|-----------|----------------|----------|-------|--------------------------|
| Industry Sector (SIC)                            | Hotline | Onsite Visit | Seminars/ Workshops | Publications | Home Page | Teleconference | Mailings | Other | TOTAL BUSINESSES REACHED |
| Example Industry (xx)                            | 1/10    | 7/7          | 3/200               | 4/500        | 1/200     | 3/100          | 2/50     |       | 1,067                    |
| Aerospace (37)                                   |         |              |                     |              |           |                |          |       |                          |
| Agriculture/Farming/ Crop Service (01, 07)       |         |              |                     |              |           |                |          |       |                          |
| Airports/Air Transportation (45)                 |         |              |                     |              |           |                |          |       |                          |
| Analytical/Medical Instruments (38)              |         |              |                     |              |           |                |          |       |                          |
| Asbestos/Remediation (17, 32)                    |         |              |                     |              |           |                |          |       |                          |
| Asphalt (295)                                    |         |              |                     |              |           |                |          |       |                          |
| Attorney/Consultant/ Engineer (81, 87)           |         |              |                     |              |           |                |          |       |                          |
| Auto/Motor Vehicle Dealers & Equipment (55, 501) |         |              |                     |              |           |                |          |       |                          |
| Auto/Body Maintenance, Repair, Refinishing (75)  |         |              |                     |              |           |                |          |       |                          |
| Bakeries (546)                                   |         |              |                     |              |           |                |          |       |                          |
| Boat Manufacturing (373)                         |         |              |                     |              |           |                |          |       |                          |
| Boilers (34, 50)                                 |         |              |                     |              |           |                |          |       |                          |
| Business Services (73)                           |         |              |                     |              |           |                |          |       |                          |
| Chemicals/Products (28)                          |         |              |                     |              |           |                |          |       |                          |

| TABLE A  |         |              |                     |              |           |                |          |       |                          |
|--|---------|--------------|---------------------|--------------|-----------|----------------|----------|-------|--------------------------|
| Industry Sector (SIC)                                  | Hotline | Onsite Visit | Seminars/ Workshops | Publications | Home Page | Teleconference | Mailings | Other | TOTAL BUSINESSES REACHED |
| Communications (48)                                    |         |              |                     |              |           |                |          |       |                          |
| Concrete/Aggregate (32)                                |         |              |                     |              |           |                |          |       |                          |
| Construction/ Contractor (15, 16, 17)                  |         |              |                     |              |           |                |          |       |                          |
| Cotton Gins (072)                                      |         |              |                     |              |           |                |          |       |                          |
| Crushed Stone Products/Sand & Gravel (14)              |         |              |                     |              |           |                |          |       |                          |
| Dairy/Feedlots/ Livestock (02)                         |         |              |                     |              |           |                |          |       |                          |
| Degreasers   |         |              |                     |              |           |                |          |       |                          |
| Dry Cleaners/Laundry Services (721)                    |         |              |                     |              |           |                |          |       |                          |
| Electronics/Electric Equipment/Repair (36, 762)        |         |              |                     |              |           |                |          |       |                          |
| Electroplating/Chrome Plating (347)                    |         |              |                     |              |           |                |          |       |                          |
| Engines & Turbines (351)                               |         |              |                     |              |           |                |          |       |                          |
| Food/Beverage Products & Processing (20, 514)          |         |              |                     |              |           |                |          |       |                          |
| Foundry/Smelter, Forging, Casting (33)                 |         |              |                     |              |           |                |          |       |                          |
| Furniture Manufacture/ Repair/Wood Finishing (25, 764) |         |              |                     |              |           |                |          |       |                          |

TABLE A

| Industry Sector (SIC)                               | Hotline | Onsite Visit | Seminars/ Workshops | Publications | Home Page | Teleconference | Mailings | Other | TOTAL BUSINESSES REACHED |
|---|---------|--------------|---------------------|--------------|-----------|----------------|----------|-------|--------------------------|
| Gasoline Distribution (wholesale/retail) (517, 554) |         |              |                     |              |           |                |          |       |                          |
| Government (91, 95)                                 |         |              |                     |              |           |                |          |       |                          |
| Grains/Grain Elevators (011, 422)                   |         |              |                     |              |           |                |          |       |                          |
| Hospitals/Medical Health Services (80)              |         |              |                     |              |           |                |          |       |                          |
| Hotels/Motels (70)                                  |         |              |                     |              |           |                |          |       |                          |
| Incinerators  |         |              |                     |              |           |                |          |       |                          |
| Landfills/Landfill Gas (495)                        |         |              |                     |              |           |                |          |       |                          |
| Leather/Fur (31, 237)                               |         |              |                     |              |           |                |          |       |                          |
| Machine Shop (359)                                  |         |              |                     |              |           |                |          |       |                          |
| Machine/Equipment Manufacturing & Repair (35)       |         |              |                     |              |           |                |          |       |                          |
| Manufacturing, Misc.                                |         |              |                     |              |           |                |          |       |                          |
| Metal Fabrication/ Finishing (34)                   |         |              |                     |              |           |                |          |       |                          |
| Mining (Metal & Coal) (10, 12)                      |         |              |                     |              |           |                |          |       |                          |
| Organizations/ Associations (86)                    |         |              |                     |              |           |                |          |       |                          |
| Paints & Painting/Coatings (172, 285)               |         |              |                     |              |           |                |          |       |                          |
| Paper Manufacturing & Products (26)                 |         |              |                     |              |           |                |          |       |                          |



TABLE A

| Industry Sector (SIC)                            | Hotline | Onsite Visit | Seminars/ Workshops | Publications | Home Page | Teleconference | Mailings | Other | TOTAL BUSINESSES REACHED |
|--|---------|--------------|---------------------|--------------|-----------|----------------|----------|-------|--------------------------|
| Personal Services (72)                           |         |              |                     |              |           |                |          |       |                          |
| Petroleum Products, Storage, Pipelines (29, 46)  |         |              |                     |              |           |                |          |       |                          |
| Pharmaceuticals (283)                            |         |              |                     |              |           |                |          |       |                          |
| Plastic Manufacturing/ Products (308)            |         |              |                     |              |           |                |          |       |                          |
| Plumbing/HVAC (171)                              |         |              |                     |              |           |                |          |       |                          |
| Printing/Graphic Arts (27)                       |         |              |                     |              |           |                |          |       |                          |
| Private Citizen                                  |         |              |                     |              |           |                |          |       |                          |
| Real Estate (65)                                 |         |              |                     |              |           |                |          |       |                          |
| Recreation Services (79)                         |         |              |                     |              |           |                |          |       |                          |
| Recycling (509)                                  |         |              |                     |              |           |                |          |       |                          |
| Repair, Misc. (76)                               |         |              |                     |              |           |                |          |       |                          |
| Research & Testing Facilities/Laboratories (873) |         |              |                     |              |           |                |          |       |                          |
| Restaurants (581)                                |         |              |                     |              |           |                |          |       |                          |
| Retail/Wholesale Trade (50, 51, 59)              |         |              |                     |              |           |                |          |       |                          |
| Rubber Manufacturing/ Products (30)              |         |              |                     |              |           |                |          |       |                          |
| Sawmills/Logging/ Wood Products (24)             |         |              |                     |              |           |                |          |       |                          |
| Schools (82)                                     |         |              |                     |              |           |                |          |       |                          |

TABLE A

| Industry Sector (SIC)                | Hotline | Onsite Visit | Seminars/ Workshops | Publications | Home Page | Teleconference | Mailings | Other | TOTAL BUSINESSES REACHED |
|--------------------------------------|---------|--------------|---------------------|--------------|-----------|----------------|----------|-------|--------------------------|
| Stone/Clay/Glass (32)                |         |              |                     |              |           |                |          |       |                          |
| Textiles & Apparel (22, 23)          |         |              |                     |              |           |                |          |       |                          |
| Transit (Passenger) (41)             |         |              |                     |              |           |                |          |       |                          |
| Transportation Equipment (37)        |         |              |                     |              |           |                |          |       |                          |
| Transportation Services (42, 44, 47) |         |              |                     |              |           |                |          |       |                          |
| Utilities (49)                       |         |              |                     |              |           |                |          |       |                          |
| Veterinarians (074)                  |         |              |                     |              |           |                |          |       |                          |
| Waste/Waste Hauling (495)            |         |              |                     |              |           |                |          |       |                          |
| Wastewater Treatment (495)           |         |              |                     |              |           |                |          |       |                          |
| Cross Sector                         |         |              |                     |              |           |                |          |       |                          |
| Other                                |         |              |                     |              |           |                |          |       |                          |
| <b>TOTAL</b>                         |         |              |                     |              |           |                |          |       |                          |

Please indicate the total number of assistance requests your program receives by Clean Air Act requests and multimedia requests.

**TABLE B**

| TYPE OF ASSISTANCE REQUESTED      | TOTAL # OF REQUESTS |                             |
|-----------------------------------|---------------------|-----------------------------|
|                                   | CAA Requests        | Non-air/Multimedia Requests |
| Compliance/Regulatory Information |                     |                             |
| Monitoring                        |                     |                             |
| Recordkeeping                     |                     |                             |
| Financial/Funding Information     |                     |                             |
| Permitting                        |                     |                             |
| General CAA Information           |                     |                             |
| Add to General Mailing List       |                     |                             |
| P2 Assistance                     |                     |                             |
| Other                             |                     |                             |
| <b>TOTAL</b>                      |                     |                             |

**3.2** Please list any *high-priority* industry sectors that your program targeted for assistance during this reporting period.

|  |
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**3.3** Briefly describe any outreach methods that were particularly effective for your program and why (e.g., number of businesses reached, cost effectiveness, improvements in compliance).

|  |
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- 3.4 Please provide a list of *new* documents that were prepared and distributed by your program during this reporting period. List industry sector, if applicable.**

|  |
|--|
|  |
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- 3.5 If your SBTCP services include an electronic bulletin board or Internet home page, please list the information that is accessible.**

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

**Do you ask for feedback on your web site or bulletin board? If so, what are your most common comments?**

|  |
|--|
|  |
|--|

How many times was your electronic bulletin board or home page accessed during the 1998 reporting period)?

|  |
|--|
|  |
|--|

## COMPLIANCE ADVISORY PANEL

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

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

## OTHER SERVICES/CONDUCT OF ACTIVITIES

3.7 Does your program have or is your program planning a grant or loan program to assist small businesses comply with the CAA?

|     |  |
|-----|--|
| YES |  |
| NO  |  |

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

| DATE AVAILABLE | GRANT OR LOAN? | NAME OF PROGRAM | FUNDING LEVEL |
|----------------|----------------|-----------------|---------------|
|                |                |                 |               |
|                |                |                 |               |
|                |                |                 |               |

**3.8 Briefly describe the types of cooperative efforts that each component of the SBTCP has in place. How are you partnering with others?**

*This question is critical to understanding how some programs, with limited budgets and resources (typically with the SBAP and SBO components) function. For example, what types of cooperative efforts are in place with personnel from other departments, agencies, or organizations?*

| <b>SBTCP COMPONENT</b> | <b>BRIEF DESCRIPTION OF COOPERATIVE EFFORTS</b> |
|------------------------|---|
| <b>SBO</b>             |   |
| <b>SBAP</b>            |   |
| <b>CAP</b>             |   |

**3.9 How does your program avoid duplication of efforts with SBTCPs in other states or territories?**

*We want to find out to what extent programs share or exchange information with SBTCPs in other states and territories. For example, did other programs develop factsheets or information packets that your SBTCP used (with minimal editing)?*

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

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

*The CAP is responsible for critiquing how well the SBTCP follows the intent of the provisions of these three federal acts. To make it easy to complete this question, various possibilities for each Act are listed in the tables below. Please add additional items as appropriate.*

| <b>PAPERWORK REDUCTION ACT</b>  | <b>Please check appropriate boxes</b> |
|---|---------------------------------------|
| <b>Routine review of information collection activities conducted by SBAP to ensure the information request is not duplicative or unnecessarily burdensome</b> |                                       |
| <b>Routine review of SBTCP documents for compliance</b>   |                                       |
| <b>Receiving/providing information electronically</b>   |                                       |
| <b>Simplified/consolidated permits or forms</b>   |                                       |
| <b>Eliminating unnecessary permits by increasing exemptions for insignificant actions</b>   |                                       |
| <b>General permits for certain types of industries</b>  |                                       |
| <b>Other (please list)</b>  |                                       |

| <b>REGULATORY FLEXIBILITY ACT</b>  | <b>Please check appropriate boxes</b> |
|--|---------------------------------------|
| <b>Ensure that small businesses are allowed to participate in rulemakings that have an effect on them</b>                              |                                       |
| <b>Ensure that all existing rules periodically are reviewed to determine their impact on small businesses and changed as necessary</b> |                                       |
| <b>Routine review of SBTCP documents for compliance</b>  |                                       |
| <b>Amnesty program</b>   |                                       |
| <b>Other (please list)</b>   |                                       |

| <b>EQUAL ACCESS TO JUSTICE ACT</b>   | <b>Please check appropriate boxes</b> |
|--|---------------------------------------|
| <b>Routine compliance review of SBTCP documents</b>  |                                       |
| <b>Review of instances where state actions against small businesses appear unjustified</b> |                                       |
| <b>Pro bono legal services</b>   |                                       |
| <b>Funding/technical assistance for groups aggrieved by regulatory actions</b>             |                                       |
| <b>Other (please list)</b>   |                                       |

## SECTION 4 PROGRAM EFFECTIVENESS

*These questions are designed to collect information about program goals, measurement of effectiveness, and results.*

### 4.1 What are your program's goals?

*Please indicate up to 3 choices, but number in terms of priority.*

| RANK | PROGRAM GOAL  |
|------|---|
|      | To increase the regulated community's understanding of their environmental obligations. |
|      | To increase the regulated community's understanding of the permitting process.          |
|      | To increase the regulated community's understanding of the CAA.                         |
|      | To provide site-specific compliance assistance.   |
|      | To encourage self-auditing.   |
|      | To improve the compliance rates of the regulated community.                             |
|      | Other (please explain).   |

### 4.2 How are you evaluating whether your above-stated goals are or are not being met?

*For example, you may use questionnaires, statistics on the number of businesses helped in a certain manner, the number of new permits issued, etc. Ideally, your goals and assessment strategies will be stated in quantifiable terms (e.g., The SBTCP will target 2 business sectors through mailings, seminars, and on-site assistance to increase their rate of permit filings by 50%). Your program may still be at the stage where your goals are of a more general nature (e.g., The SBTCP will provide services to small businesses through a hotline, on-site visits, seminars, etc.).*

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**4.3 What are the results of this measurement process?**

*Did your SBTCP meet its program goals? Did the measurement system work? What statistics or comments did your SBTCP gather to indicate that your goals have or have not been met?*

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

- 4.5 Please share any tips/hints/barriers first developed or recognized by your program (e.g., Tips: Performance based reporting ideas, Hints: Ways to optimize program delivery, Barriers: Legislative mandate for appointing CAP and potential conflict with reporting process).**

- 4.6 Success stories/case studies are strong examples of a program's effectiveness. Please share any success stories/case studies, including type of business(es) helped, existing problems, outreach methods used, improvements in compliance, etc.**

## SECTION 5 COMPLIANCE ASSISTANCE

### 5.1 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 Maximum Achievable Control Technology (MACT) or New Source Performance Standards (NSPS), or unpermitted emissions. Please indicate if certain problems are prevalent in any particular industry sector. A number of possible answers are listed below. Please check all those appropriate.*

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

**Please list any specific regulations, monitoring, or recordkeeping requirements that are particular problems.**

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

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

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

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**5.3 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 want to know how programs avoid COI and maintain confidentiality -- particularly in those cases where the SBAP is in the regulatory agency.*

|  |
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**5.4 Has your program used EPA's Policy on Compliance Incentives for Small Businesses (Small Business Policy) or a comparable state policy for small businesses/small communities? If so, please provide narrative details on your activities in the boxes below, and then complete the table for the period January through December 1998.**

|   |
|---|
| <b>SMALL BUSINESS POLICY ACTIVITIES</b> |
|   |

|  |
|--|
| <b>SMALL COMMUNITY POLICY ACTIVITIES</b> |
|  |

|                                | # Small Entities<br>Qualifying Under<br>the Policy | # Small Entities<br>Attempting to Use<br>Policy, Still Under<br>Consideration | # Small Entities<br>Attempting to Use<br>Policy, But Not<br>Qualifying | Total \$ Amount of<br>Penalties Reduced |
|--------------------------------|--|---|--|---|
| Small<br>Business<br>Policy    |  |   |  |   |
| Small<br>Communities<br>Policy |  |   |  |   |

**This is the end of the 1998 SBTCP Annual Reporting Form. Thank you, and all contributors, for the completeness and accuracy of your Report. A copy of the EPA 1998 Report to Congress will be provided upon its submittal.**

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## **APPENDIX B**

# **FEDERAL SMALL BUSINESS OMBUDSMAN**

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**APPENDIX B**  
**OFFICE OF THE EPA SMALL BUSINESS OMBUDSMAN**

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

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

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

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

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

- Serving as liaison between small businesses and the EPA to promote understanding of Agency policy and small business needs and concerns.
- Staffing a small business hotline that provides regulatory and technical assistance information.
- Maintaining and distributing an extensive collection of informational and technical literature developed by the various EPA program offices.
- Making personal appearances as a speaker or panelist at small business-related meetings.
- Interfacing on an on-going basis with over 70 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 450 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 29 years of management service with EPA.

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

## **TOLL-FREE HOTLINE SERVICE**

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

The toll-free hotline number is:

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

Callers request information on a variety of topics including:

- Clean Air Act regulations
- Underground storage tank notification
- Small quantity generator requirements
- Effluent standard guidelines



- Used oil
- Asbestos compliance
- Waste minimization/pollution prevention
- Pesticide registration fees.

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

## **REGULATORY TRACKING AND ANALYSIS**

The SBO performs a careful review of all proposed regulatory actions published in the biannual regulatory agenda to make a prima 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 1998, the SBO reviewed and/or monitored over 100 regulatory actions with some significant degree of intensity. In all instances, the SBO endeavored to minimize the requirements (especially reporting and record keeping) on small businesses. Equally significant is the level of voluntary compliance with EPA regulations by the small business community as a result of the rapport established between the Ombudsman and trade associations during the developmental phase of the regulations.

## **MAJOR INITIATIVES IN 1998**

The SBO's efforts to assist the small business community continue at a high level. Key accomplishments and activities for 1998 (some of which are on-going) include:

- Hosted fifth National Small Business Ombudsman and Technical Assistance Program Conference in Scottsdale, AZ, which was attended by 47 states, 2 territories, and the District of Columbia (185 participants). Set plans and issued a grant to the state of Florida's Environmental Protection Agency to coordinate a sixth conference in April 1999 in Tampa, FL.
- Developed external stakeholder guidance and acted as a principal participant in the Agency's Eighth Regulatory Tiering (prioritizing) Process.
- Coordinated individual meetings and follow-up meetings among major small business trade associations and the EPA Deputy Administrator, Assistant Administrators, and Agency Small Business Program Office representatives to discuss small business initiatives and issues. These meetings were held on April 17, June 17, September 18, and November 24, 1998.
- Worked in cooperation with the University of Tennessee's Industrial Services Center and the EPA Office of Air Quality Planning and Standards on a satellite teleconference on National Volatile Organic Emissions Standards for Consumer Products.
- Finalized EPA's 1997 Small Business Ombudsman Report to Congress under Section 507 of the 1990 Clean Air Act Amendments.

- Received three-year ICR approval for state Section 507 reporting for years 1998-2000 from the Office of Management and Budget.
- Cooperatively managing the Small Business Regulatory Enforcement Fairness Act of 1996 Small Business Entity Outreach Sub-group to implement Act requirements.
- Conducted Small Business Liaison Conference for EPA Regional Small Business Representatives in August 1998.
- Developed an EPA Small Business Ombudsman Internet home page at [www.epa.gov/sbo](http://www.epa.gov/sbo).
- Conducted a state Compliance Advisory Panel Training and Networking Meeting in Scottsdale, AZ on March 29, 1998.
- Developed a State Multimedia Resource Guide for Small Business Assistance Programs.
- Developed the Environmental Management Assistance Guide for Small Laboratories.
- Developing a Compliance Advisory Panel (CAP) Guidance Manual to assist state CAPs with their Clean Air Act responsibilities.

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## **APPENDIX C**

# **FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM**

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## **APPENDIX C**

### **EPA'S FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM**

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

#### **ELECTRONIC ACCESS**

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

- The SBAP home page on the World Wide Web, part of the Technology Transfer Network (TTN), provides access to EPA small business assistance information and materials. Links to other small business-related sites also are provided. The SBAP home page address is [www.epa.gov/ttn/sbap](http://www.epa.gov/ttn/sbap). In 1998, users retrieved over 1,500,000 files from the TTN.
- The SBAP home page serves as a communication link for state SBAPs and includes a list of state and EPA small business program contacts. The home page also provides a forum to share information and outreach materials developed specifically for small businesses.
- The Office of Air and Radiation, Policy and Guidance home page, also part of the Technology Transfer Network, contains proposed and final rules; background, guidance, and plain-English fact sheets; and implementation strategy updates and schedules.

#### **PLAIN ENGLISH GUIDANCE MATERIALS**

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

- Halogenated Solvent Cleaning (completed May 1995).
- Chromium Electroplating and Anodizing (completed May 1995).
- Wood Furniture (completed September 1997).

Work has started on guidance for Potential-To-Emit (PTE) to assist businesses with PTE calculations. This document will be available in early 1999.

## **SATELLITE SEMINARS**

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

- Perc Drycleaners (May 1994) had 3,000 participants at 197 sites in 48 states, one Canadian site, and two in Mexico.
- Halogenated Solvent Cleaning/Degreasing (May 1995) had 1,300 participants at 101 sites in 45 states, one site in Canada, and two in Mexico.
- Chromium Electroplating (November 1995) had 2,000 participants at 140 sites in 43 states.
- Green and Profitable Printing (May 1996) was presented in cooperation with EPA's Office of Compliance through the Printer's National Environmental Assistance Center.
- Wood Furniture Manufacturing (September 1996) had approximately 1,900 participants at 140 sites in 34 states.
- Consumer Products (October 1998) had approximately 600 participants at 100 sites in 40 states. This project included a post-broadcast help-site on the Internet, and distribution of broadcast video tapes upon request.

## **ANNUAL CONFERENCE**

From 1993 to 1997, EPA held an annual SBO/SBAP Conference, which was co-sponsored by OAQPS's Federal SBAP and the EPA SBO. In 1998, responsibility for the annual conference was moved to an individual State program; funding was provided by EPA in the form of a grant. The host State was assisted in conference planning by a committee of State program representatives. The 1998 meeting was hosted by the Maricopa County Small Business Environmental Assistance Program, and held in Scottsdale, Arizona, with 185 attendees from 50 states and territories, and seven local agencies. The purpose of this meeting was to:

- Facilitate communication among the state programs.
- Facilitate implementation and operation of small business assistance programs.
- Interpret regulatory and policy developments affecting small businesses.

## **OTHER PARTNERSHIP ACTIVITIES**

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

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## **APPENDIX D**

# **SBTCP STATUS, BUDGETS, STAFFING AND ORGANIZATION**

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**TABLE D-1  
STATE SMALL BUSINESS ASSISTANCE PROGRAMS  
KEY CONTACT LISTING  
DECEMBER 15, 1999**

Under State column, (A) denotes an "air only" assistance program, (M) denotes a multimedia assistance program.

| STATE          | OMBUDSMAN   | SBAP  | OTHER SBAP   |
|----------------|---|---|--|
| ALABAMA<br>(M) | Blake Roper, Ombudsman<br>Office of Education & Outreach<br>Alabama Department of Environmental<br>Management<br>P. O. Box 301463<br>Montgomery, AL 36130-1463<br>334-394-4355<br>334-271-7950 (F)<br>800-533-2336 (national)<br>rbr@adem.state.al.us<br>www.adem.state.al.us | Mike Sherman<br>Air Division<br>Alabama Department of Environmental<br>Management<br>P.O. Box 301463<br>Montgomery, AL 36130-1463<br>334-271-7873<br>334-279-3044 (F)<br>800-533-2336 (national)<br>mhs@adem.state.al.us  |  |
| ALASKA<br>(M)  |   | Tom Chapple<br>Small Business Assistance<br>ADEC<br>555 Cordova Street<br>Anchorage, AK 99501<br>907-269-7686<br>907-269-7687 (F)<br>800-510-2332 (state)<br>tchapple@envircon.state.ak.us<br>www.state.ak.us/local/akpages/ENV.<br>CONSERV/dsps/compass/cao_home.htm |  |
| ARIZONA<br>(M) | Dual role SBO and SBAP  | Gregory Workman<br>AZ DEQ - Compliance Assistance<br>3033 N. Central Avenue<br>Phoenix, AZ 85012<br>602-207-4337<br>602-207-4872 (F)<br>800-234-5677 (state)<br>workman.gregory@ev.state.az.us<br>www.adeq.state.az.us  | Cathy Chaberski<br>AZ DEQ<br>3033 N. Central Avenue<br>Phoenix, AZ 85012<br>602-207-2233<br>602-207-4872 (F)<br>800-234-5677 (state)<br>chaberski.catherine@ev.state.az.us<br>www.adeq.state.az.us |

**TABLE D-1  
(Continued)**

| STATE   | OMBUDSMAN  | SBAP   | OTHER SBAP   |
|---|--|--|--|
| ARIZONA -<br>Maricopa County<br>(A)               |  | Richard Polito<br>Maricopa County SBEAP<br>1001 N. Central, Suite 500<br>Phoenix, AZ 85004<br>602-506-5102<br>602-506-6669 (F)<br>rpolito@mail.maricopa.gov<br>www.maricopa.gov/sbeap  | Maureen Lynch or JaeChang<br>Maricopa County SBEAP<br>1001 N. Central, Suite 500<br>Phoenix, AZ 85004<br>602-506-5150 or 5149<br>602-506-6669 (F)<br>mlynch@mail.maricopa.gov or<br>jchang@mail.maricopa.gov<br>www.maricopa.gov/sbeap   |
| ARKANSAS<br>(M)                                   |  | Joe Bob Garner<br>Department of Environmental Quality<br>P.O. Box 8913<br>8001 National Drive<br>Little Rock, AR 72219-8913<br>501-682-0866<br>501-682-0880 (F)<br>888-233-0326 (national)<br>garner@adeq.state.ar.us<br>www.state.ar.us   | Kevin Pierson<br>Department of Environmental Quality<br>P.O. Box 8913<br>8001 National Drive<br>Little Rock, AR 72219-8913<br>501-682-0819<br>501-682-0880 (F)<br>888-233-0326 (national)<br>pierson@adeq.state.ar.us<br>www.state.ar.us |
| CALIFORNIA<br>(M)                                 | Kathleen Tschogl<br>Office of the Ombudsman<br>California EPA<br>Air Resources Board<br>2020 L Street<br>Sacramento, CA 95814<br>916-323-6791<br>916-323-2393 (F)<br>800-arb-hlp2 (state)<br>ktschogl@arb.ca.gov<br>Ombudsman@arb.ca.gov<br>www.arb.ca.gov                         | Peter Venturini<br>California EPA<br>Air Resources Board<br>Stationary Source<br>2020 L Street<br>P.O. Box 2815<br>Sacramento, CA 95814<br>916-445-0650<br>916-327-7212 (F)<br>800-272-4572 (state)<br>pventuri@arb.ca.gov   | Jon Pederson<br>California EPA<br>CARB-Office of Sm. Business Ombudsman<br>2020 L Street<br>P.O. Box 2815<br>Sacramento, CA 95814<br>916-322-2825<br>916-323-2393 (F)<br>jpederso@arb.ca.gov   |
| CALIFORNIA -<br>South Coast<br>(A; M by referral) | La Ronda Bowen, Public Advisor<br>South Coast Air Management District<br>Small Business Assistance Office<br>21865 E. Copley Drive<br>Diamond Bar, CA 91765<br>909-396-3235<br>909-396-3638 (F)<br>800-388-2121 (state)<br>800-CUT-SMOG (state)<br>lbowen@aqmd.gov<br>www.aqmd.gov | Larry Kolczak, Community Relations Manager<br>South Coast Air Management District<br>Small Business Assistance Office<br>21865 E. Copley Drive<br>Diamond Bar, CA 91765<br>909-396-3215<br>909-395-3335 (F)<br>800-388-2121 (state)<br>800-CUT-SMOG (state)<br>lkolczak@aqmd.gov<br>www.aqmd.gov |  |



**TABLE D-1  
(Continued)**

| STATE                          | OMBUDSMAN   | SBAP  | OTHER SBAP  |
|--------------------------------|---|---|---|
| COLORADO<br>(M)                | Cathy Heald<br>CDPHE<br>OCS-INF-A1<br>4300 Cherry Creek Drive, South<br>Denver, CO 80246-1530<br>303-692-2034<br>303-691-1979 (F)<br>800-886-7689 (state)<br>cathy.heald@state.co.us  | Nick Melliadis<br>CDPHE<br>APCD/55/B-1<br>4300 Cherry Creek Drive, South<br>Denver, CO 80246-1530<br>303-692-3175<br>303-782-5493 (F)<br>nick.melliadis@state.co.us               |   |
| CONNECTICUT<br>(M)             | Tracy Babbidge, Ombudsman<br>Small Business Assistance Program<br>Department of Environmental Protection<br>79 Elm Street<br>Hartford, CT 06106-5127<br>860-424-3382<br>860-424-4063 (F)<br>800-760-7036 (state)<br>tracy.babbidge@po.state.ct.us<br>http://dep.state.ct.us |   |   |
| DELAWARE<br>(A)                | George Petitgout<br>Small Business Ombudsman<br>Delaware DNREC<br>P.O. Box 1401<br>Dover, DE 19903<br>302-739-6400<br>302-739-6242 (F)<br>gpetitgout@dnrec.state.de.us<br>www.dnrec.state.de.us   | George Petitgout<br>Dual Role as SBAP Director  | Bob Barrish<br>Delaware DNREC<br>715 Grantham Lane<br>New Castle, DE 19720<br>302-323-4542<br>302-323-4561 (F)<br>bbarrish@state.de.us<br>www.dnrec.state.de.us |
| DISTRICT OF<br>COLUMBIA<br>(A) | Sandra Handon<br>Small Business Ombudsman<br>DC Department of Health/EHA/AQD<br>51 N Street NE, 5th Floor<br>Washington, DC 20002-3323<br>202-535-1722<br>202-535-2881 (F)<br>shandon@mail.environ.state.dc.us  | N. Olivia Achuko<br>DC Department of Health/EHA/AQD<br>51 N Street NE, 5th Floor<br>Washington, DC 20002-3323<br>202-535-2997<br>202-535-2881 (F)<br>noa@mail.environ.state.dc.us |   |

**TABLE D-1  
(Continued)**

| STATE                     | OMBUDSMAN   | SBAP   | OTHER SBAP   |
|---------------------------|---|--|--|
| FLORIDA<br>(M)            | Elsa Bishop<br>SBAP Program Administrator &<br>Ombudsman<br>FL Department of Environmental Protection<br>2600 Blair Stone Road, MS 5500<br>Tallahassee, FL 32399-2400<br>850-414-8399<br>850-922-6979 (F)<br>800-722-7457 (state)<br>elsa.bishop@dep.state.fl.us<br>www.dep.state.fl.us/air/outreach/sbap/<br>sbap1.htm | Bruce Thomas<br>Small Business Assistance Program<br>FL DEP<br>2600 Blair Stone Road, MS-5500<br>Tallahassee, FL 32399-2400<br>850-921-7744<br>850-922-6979 (F)<br>800-722-7457 (state)<br>thomas_bx@dep.state.fl.us | Shanisha Reese<br>Small Business Assistance Program<br>FL DEP<br>2600 Blair Stone Road, MS-5500<br>Tallahassee, FL 32399-2400<br>850-921-9584<br>850-922-6979 (F)<br>800-722-7457 (state)<br>reese_s@dep.state.fl.us |
| GEORGIA<br>(M)            | Marvin M. Lowry<br>GA SBAP<br>4244 International Parkway, Suite 120<br>Atlanta, GA 30354<br>404-362-2656<br>404-363-7100 (F)<br>888-373-5947 (state)<br>marvin_lowry@mail.dnr.state.ga.us<br>www.gasmallbiz.org   | Anita Dorsey-Word<br>GA SBAP<br>4244 International Parkway, Suite 120<br>Atlanta, GA 30354<br>404-362-4842<br>404-363-7100 (F)<br>adword@mail.dnr.state.ga.us<br>888-373-5947 (state)<br>www.gasmallbiz.org          |  |
| HAWAII<br>(A-SBAP; M-SBO) | Anthony Ching<br>HI Department of Health<br>Compliance Assistance Office<br>919 Ala Moana Boulevard, Suite 219<br>Honolulu, HI 96814<br>808-586-4527<br>808-586-7236 (F)<br>tjching@mail.health.state.hi.us   | Robert Tam<br>HI Department of Health<br>Clean Air Branch<br>919 Ala Moana Boulevard, Suite 203<br>Honolulu, HI 96814<br>808-586-4205<br>808-586-4359 (F)<br>rtam@eha.health.state.hi.us                             | Willie Nagamine<br>HI Department of Health<br>Clean Air Branch<br>P.O. Box 3378<br>Honolulu, HI 96801<br>808-586-4200<br>808-586-4359 (F)  |
| IDAHO<br>(M)              |   | John Bernardo (Acting)<br>Division of Environmental Quality<br>1410 North Hilton<br>Boise, ID 83706<br>208-373-0114<br>208-373-0342 (F)<br>jbernard@deq.state.id.us<br>www2.state.id.us/deq                          |  |

**TABLE D-1  
(Continued)**

| STATE           | OMBUDSMAN   | SBAP   | OTHER SBAP   |
|-----------------|---|--|--|
| ILLINOIS<br>(A) | Donald Squires<br>Illinois EPA/DAPC<br>Small Business Ombudsman<br>1021 N. Grand Avenue East, 2nd Floor<br>P.O. Box 19276<br>Springfield, IL 62794-9276<br>217-785-1625<br>217-785-8346 (F)<br>888-372-1996 (state)<br>epa8139@epa.state.il.us<br>www.epa.state.il.us           | Mark Enstrom<br>Illinois Department of Commerce<br>and Community Affairs<br>620 East Adams Street, 3rd Floor<br>Springfield, IL 62701<br>217-524-0169<br>217-785-6328 (F)<br>800-252-3998 (state)<br>menstrom@commerce.state.il.us<br>www.commerce.state.il.us     |  |
| INDIANA<br>(M)  | Erika Seydel Cheney<br>IDEM - OB&LR<br>100 N. Senate<br>P.O. Box 6015<br>Indianapolis, IN 46206-6015<br>317-232-8598<br>317-232-6647 (F)<br>800-451-6027 (press 0, request x 2-8598)<br>(state)<br>eseydel@dem.state.in.us<br>www.state.in.us/idem/ctap                         | Cheri Storms<br>IDEM - CTAP<br>100 N. Senate Avenue<br>P.O. Box 6015<br>Indianapolis, IN 46206-6015<br>317-233-1041<br>317-233-5627 (F)<br>800-451-6027 (press 0, request x 3-1041)<br>(state)<br>cstorms@dem.state.in.us<br>www.state.in.us/idem/ctap             | Paula Smith<br>IDEM - CTAP<br>100 N. Senate Avenue<br>P.O. Box 6015<br>Indianapolis, IN 46206-6015<br>317-232-8172<br>317-233-5627 (F)<br>800-451-6027 (press 0, request x 2-8172)<br>(state)<br>psmith@dem.state.in.us<br>www.state.in.us/idem/ctap                   |
| IOWA<br>(M)     | Linda King<br>IA Department of Development<br>Small Business Liaison for Air Quality<br>200 E. Grand Avenue<br>Des Moines, IA 50309<br>515-242-4761<br>515-242-4749 (F)<br>800-351-4668 (national)<br>linda.king@ided.state.ia.us<br>www.state.ia.us/sbro                       | John Konefes<br>IA Waste Reduction Center<br>University of Northern Iowa<br>1005 Technology Parkway<br>Cedar Falls, IA 50613-6951<br>319-273-8905<br>319-268-3733 (F)<br>800-422-3109 (state)<br>konefes@uni.edu<br>www.iwrc.org                                   | Scott Vander Hart<br>Iowa Department of Natural Resources<br>Air Quality Bureau<br>7900 Hickman Road<br>Urbandale, IA 50322<br>515-281-6061<br>515-242-5094 (F)<br>svander@max.state.ia.us   |
| KANSAS<br>(M)   | Janet Neff<br>Environmental Ombudsman<br>Planning & Prevention Section<br>KS DH&E<br>Forbes Field, Building 283<br>Topeka, KS 66620<br>785-296-0669<br>785-291-3266 (F)<br>800-357-6087 (national)<br>jneff@kdhe.state.ks.us<br>www.sbeap.niar.twsu.edu<br>www.kdhe.state.ks.us | Frank Orzulak, Director<br>Division of Continuing Education<br>University of Kansas<br>1515 St. Andrews Drive<br>Lawrence, KS 66047-1625<br>785-864-3978<br>785-864-5827 (F)<br>800-578-8898 (national)<br>forzulak@falcon.cc.ukans.edu<br>www.sbeap.niar.twsu.edu | Jean Waters<br>Small Business Assistance Program<br>Pollution Prevention Institute<br>Kansas State University<br>133 Ward Hall<br>Manhattan, KS 66506-2508<br>785-532-4698<br>785-532-6952 (F)<br>800-578-8898 (national)<br>jeansw@ksu.edu<br>www.sbeap.niar.twsu.edu |

**TABLE D-1  
(Continued)**

| STATE                                 | OMBUDSMAN   | SBAP  | OTHER SBAP   |
|---------------------------------------|---|---|--|
| KENTUCKY<br>(A)                       | Rose Marie Wilmoth<br>Air Quality Representative for Small<br>Business<br>Commissioner's Office<br>Department for Environmental Protection<br>14 Reilly Road, Ash Building<br>Frankfort, KY 40601<br>502-564-2150, x128<br>502-564-4245 (F)<br>800-926-8111 (national)<br>wilmoth@nrdep.nr.state.ky.us<br>www.nr.state.ky.us/nrepc/dep/smbizair/<br>index.htm | Gregory C. Copley, Director<br>Kentucky Business Environmental Assistance<br>Program<br>UK Center for Entrepreneurship<br>Gatton College of Business and Economics,<br>Room 227<br>Lexington, KY 40506-0034<br>606-257-1131<br>606-323-1907 (F)<br>800-562-2327 (national)<br>kbeap@pop.uky.edu<br>http://gatton.gws.uky.edu/KentuckyBusiness/<br>kbeap/kbeap.htm | Susan Weaver<br>Division for Air Quality<br>KY DNR&EP<br>803 Schenkel Lane<br>Frankfort, KY 40601<br>502-573-3382<br>502-573-3787 (F)<br>Susan.Weaver@mail.state.ky.us<br>http://www.state.ky.us/agencies/nrepc/dep/<br>daq/daqhome.html |
| KENTUCKY -<br>Jefferson County<br>(A) | Cara S. Waddell<br>Small Business Air Pollution Ombudsman<br>Department of Planning & Environmental<br>Management<br>810 Barrett Avenue, Room 637<br>Louisville, KY 40204<br>502-574-5164<br>502-574-8188 (F)   |   |  |
| LOUISIANA<br>(M)                      | Jim Friloux, Small Business Ombudsman<br>LDEQ<br>P.O. Box 82263<br>Baton Rouge, LA 70884<br>225-765-0735<br>225-765-0746 (F)<br>800-259-2890 (state)<br>jim_f@deq.state.la.us<br>www.deq.state.la.us/oarp/sbap/sbap.htm   | Dick Lehr<br>LDEQ<br>P.O. Box 82135<br>Baton Rouge, LA 70884-2135<br>225-765-2723<br>225-765-0921 (F)<br>800-259-2890 (state)<br>richard_l@deq.state.la.us<br>www.deq.state.la.us/oarp/sbap/sbap.htm  | Beth Altazan-Dixon<br>LDEQ<br>P.O. Box 82135<br>Baton Rouge, LA 70884-2135<br>225-765-2450<br>225-765-0921 (F)<br>800-259-2890 (state)<br>beth_a@deq.state.la.us<br>www.deq.state.la.us/oarp/sbap/sbap.htm                               |
| MAINE<br>(M)                          | Ron Dyer<br>Maine DEP<br>Office of Innovation and Assistance<br>Station 17<br>State House<br>Augusta, ME 04333<br>207-287-4152<br>207-287-2814 (F)<br>800-789-9802 (state)<br>ron.e.dyer@state.me.us<br>www.state.me.us/dep   | Brian Kavanah<br>Maine DEP<br>Office of Innovation and Assistance<br>Station 17<br>State House<br>Augusta, ME 04333<br>207-287-6188<br>207-287-2814 (F)<br>800-789-9802 (state)<br>brian.w.kavanah@state.me.us<br>www.state.me.us/dep   | Jim Brooks<br>Maine DEP<br>Bureau of Air Quality<br>Station 17<br>State House<br>Augusta, ME 04333<br>207-287-2437<br>207-287-7641 (F)   |

**TABLE D-1  
(Continued)**

| STATE                | OMBUDSMAN   | SBAP  | OTHER SBAP   |
|----------------------|---|---|--|
| MARYLAND<br>(M)      | John Mitchell<br>MD Department of the Environment<br>Office of Community Assistance<br>2500 Broening Highway<br>Baltimore, MD 21224<br>410-631-3772<br>410-631-4477 (F)<br>800-633-6101, x3003 (state)<br>jmittchell@mde.state.md.us<br>www.mde.state.md.us | Andrew Gosden<br>MD Department of the Environment<br>Environmental Permits Service Center<br>2500 Broening Highway<br>Baltimore, MD 21224<br>410-631-4158<br>410-631-4477 (F)<br>800-633-6101 x4158 (state)<br>www.mde.state.md.us                          | Susan Battle<br>Environmental Permits Service Center<br>MD Department of the Environment<br>2500 Broening Highway<br>Baltimore, MD 21224<br>410-631-3772<br>410-631-4477 (F)<br>800-633-6101 (state)<br>sbattle@mde.state.md.us<br>www.mde.state.md.us |
| MASSACHUSETTS<br>(M) |   |   | Rick Reibstein<br>MA Office of Technical Assistance for Toxics<br>Use Reduction<br>100 Cambridge Street, Room 2109<br>Boston, MA 02202<br>617-727-3260 x688<br>617-727-3827 (F)<br>rick.reibstein@state.ma.us<br>www.magnet.state.ma.us/ota            |
| MICHIGAN<br>(A)      | Dana Lee Cole<br>MI Jobs Commission<br>Victor Center, 4th Floor<br>201 N. Washington<br>Lansing, MI 48913<br>517-241-3518<br>517-241-3689(F)<br>www.michigan.org  | Dave Fiedler<br>Clean Air Assistance Program<br>MDEQ Environmental Assistance Division<br>P.O. Box 30457<br>Lansing, MI 48909<br>517-373-0607<br>517-335-4729 (F)<br>800-662-9278 (national)<br>fiedlerd@state.mi.us<br>www.deq.state.mi.us/ead/eosect/caap |  |
| MINNESOTA<br>(M)     | Charlie Kennedy<br>MPCA/PPRF/SBO<br>520 Lafayette Road North<br>St. Paul, MN 55155-4194<br>651-297-8615<br>651-297-8676 (F)<br>800-985-4247 (state)<br>charlie.kennedy@pca.state.mn.us<br>www.pca.state.mn.us/programs/<br>sbomb_p.html                     | Troy Johnson<br>MPCA/MDRF/SBAP<br>520 Lafayette Road North<br>St. Paul, MN 55155<br>651-296-7767<br>651-282-6247 (F)<br>800-657-3938 (state)<br>troy.johnson@pca.state.mn.us<br>www.pca.state.mn.us/programs/sbap_p.html                                    |  |

**TABLE D-1  
(Continued)**

| STATE              | OMBUDSMAN   | SBAP   | OTHER SBAP   |
|--------------------|---|--|--|
| MISSISSIPPI<br>(M) | Jesse Thompson, Jr.<br>Small Business Ombudsman<br>MS DEQ<br>2380 Hwy. 80 West<br>P.O. Box 20305<br>Jackson, MS 39289<br>601-961-5167<br>601-961-5541 (F)<br>800-725-6112 (national)<br>Jesse_Thompson@deq.state.ms.us<br>www.deq.state.ms.us                   | Randy Wolfe<br>Small Business Technical Assistance Dir.<br>MS DEQ<br>2380 Hwy. 80 West<br>P.O. Box 20305<br>Jackson, MS 39289<br>601-961-5166<br>601-961-5541 (F)<br>800-725-6112 (national)<br>Randy_Wolfe@deq.state.ms.us<br>www.deq.state.ms.us   | Cathy Johnson / Operations Management<br>Analyst/SBAP<br>MS DEQ<br>2380 Hwy. 80 West<br>P.O. Box 20305<br>Jackson, MS 39289<br>601-961-5676<br>601-961-5541 (F)<br>800-725-6112 (national)<br>Cathy_Johnson@deq.state.ms.us  |
| MISSOURI<br>(M)    | Angie Heffner<br>State of Missouri<br>Office of the Governor<br>State Capitol<br>Jefferson City, MO 65102<br>573-751-3222<br>573-526-5808 (F)<br>800-361-4827 (national)<br>@mail.gov.state.mo.us   | Byron Shaw, Jr.<br>DNR Technical Assistance Program<br>Jefferson State Office Building<br>1659 E. Elm Street<br>P.O. Box 176<br>Jefferson City, MO 65102<br>573-526-6627<br>573-526-5808 (F)<br>800-361-4827 (national)<br>nrshawb@mail.dnr.state.mo.us<br>www.dnr.state.mo.us/deq/tap/hometap.htm |  |
| MONTANA<br>(M)     | Karen Ekstrom<br>Department of Environmental Quality<br>Business & Community Assistance<br>1520 E. 6th Avenue<br>P.O. Box 200901<br>Helena, MT 59620-0901<br>406-444-2960<br>406-444-6836 (F)<br>800-433-8773 (state)<br>kekstrom@mt.gov<br>www.deq.state.mt.us | Warren Norton<br>Department of Environmental Quality<br>Air Quality Division<br>1520 E. 6th Avenue<br>P.O. Box 200901<br>Helena, MT 59620-0901<br>406-444-5281<br>406-444-1499 (F)<br>800-433-8773 (state)<br>wnorton@mt.gov<br>www.deq.state.mt.us  | Mark Lambrecht<br>Department of Environmental Quality<br>Mgr. Bus. and Community Assistance<br>1520 E. 6th Avenue<br>P.O. Box 200901<br>Helena, MT 59620-0901<br>406-444-2960<br>406-444-6836 (F)<br>800-433-8773 (state)<br>malambracht@mt.gov<br>www.deq.state.mt.us |
| NEBRASKA<br>(M)    | Dan Eddinger<br>Public Advocate<br>NE Department of Environmental Quality<br>P.O. Box 98922<br>Lincoln, NE 68503<br>402-471-3413<br>402-471-2909 (F)<br>877-253-2603 (state)<br>deq178@deq.state.ne.us<br>de21411@navix.net<br>www.deq.state.ne.us              | Dan Eddinger<br>Dual Role as Ombudsman and SBAP<br>Principal   |  |

**TABLE D-1  
(Continued)**

| STATE                | OMBUDSMAN  | SBAP  | OTHER SBAP   |
|----------------------|--|---|--|
| NEVADA<br>(M)        | Marcia Manley<br>Small Business Ombudsman<br>NV Division of Environmental Protection<br>333 West Nye Lane<br>Carson City, NV 89706-0851<br>702-687-4670, x3162<br>702-687-5856 (F)<br>mmanley@ndep.carson-city.nv.us<br>www.state.nv.us/ndep/sba/sba01.htm                     | Janet Goodman<br>Technical Assistance Coordinator/SBAP<br>NV Division of Environmental Protection<br>333 West Nye Lane<br>Carson City, NV 897060851<br>702-687-4670, x3164<br>702-687-5856 (F)<br>jgoodman@ndep.carson-city.nv.us<br>www.state.nv.us/ndep/sba/sba01.htm | Kevin Dick<br>UNR/NV SBDC<br>Business Environmental Program<br>College of Business Administration-032<br>Reno, NV 89505-9975<br>702-784-1717<br>702-784-4237 (F) |
| NEW HAMPSHIRE<br>(M) | Rudolph Cartier<br>Dual Role as Ombudsman and SBAP<br>Principal  | Rudolph Cartier<br>Air Resources Division<br>Department of Environmental Services<br>6 Hazen Drive<br>Concord, NH 03301-2033<br>603-271-1379<br>603-271-1381 (F)<br>800-837-0656 (state)<br>r_cartier@des.state.nh.us   |  |
| NEW JERSEY<br>(M)    | Lauren Moore<br>Office of Business Advocacy<br>NJ Commerce Commission<br>20 West State Street<br>P.O. Box 839<br>Trenton, NJ 08625-0839<br>609-292-3863<br>609-777-4097 (F)<br>800-643-6090 (national)<br>ceamoore@commerce.state.nj.us<br>www.state.nj.us/commerce/caasbo.htm | Chuck McCarty<br>SBAP<br>NJ DEP<br>401 East State Street, 3rd Floor<br>P.O. Box 423<br>Trenton, NJ 08625-0423<br>609-292-3600<br>609-777-1330 (F)<br>877-753-1151<br>cmccarty@dep.state.nj.us<br>www.state.nj.us/dep/aqm/sbap.htm                                       | Jeanne Mroczko<br>Pollution Prevention-Permit Coordinator<br>SBAP<br>NJ DEP<br>P.O. Box 423<br>Trenton, NJ 08625-0423<br>609-292-3600<br>609-777-1330 (F)        |
| NEW MEXICO<br>(A)    | Robert Horwitz<br>NM ED/AQB<br>Harold Runnels Building<br>P.O. Box 26110<br>Santa Fe, NM 87502<br>505-827-9685<br>505-827-0045 (F)<br>800-810-7227 (national)<br>www.nmenv.state.nm.us   | Cecilia Williams<br>NM ED/AQB<br>Harold Runnels Building<br>P.O. Box 26110<br>Santa Fe, NM 87502<br>505-827-0042<br>505-827-0045 (F)<br>800-810-7227 (national)<br>cecilia_williams@nmenv.state.nm.us<br>www.nmenv.state.nm.us  | John Liberature<br>City of Albuquerque<br>EHD/APCD<br>P.O. Box 1293<br>Albuquerque, NM 87103<br>505-768-1964<br>505-768-2617 (F)                                 |

**TABLE D-1  
(Continued)**

| STATE                 | OMBUDSMAN  | SBAP  | OTHER SBAP   |
|-----------------------|--|---|--|
| NEW YORK<br>(A)       | Tria Case<br>Director, Environmental Business Services<br>NYS Empire State Development<br>633 3rd Avenue, 32nd Floor<br>New York, NY 10017<br>212-803-2280<br>212-803-2309 (F)<br>800-782-8369 (national)<br>tcase@empire.state.ny.us<br>www.empire.state.ny.us/sbeo/                                    | Marian J. Mudar, Ph.D.<br>Environmental Program Manager<br>NYS Environmental Facilities Corporation<br>50 Wolf Road<br>Albany, NY 12205<br>518-457-9135<br>518-457-8681 (F)<br>800-780-7227 (state)<br>mudar@nysefc.org<br>www.nysefc.org                             | Patrick Lentile<br>Bureau of Technical Support<br>NYS Dept. of Environmental Conservation<br>Division of Air Resources<br>50 Wolf Road, Room 110<br>Albany, NY 12233<br>518-457-7450<br>518-457-0794 (F)<br>pxlentli@gw.dec.state.ny.us                            |
| NORTH CAROLINA<br>(M) | Edythe McKinney<br>Office of the Small Business Ombudsman<br>Department of Environment, Health, and<br>Natural Resources<br>2728 Capital Boulevard<br>P.O. Box 29583<br>Raleigh, NC 27626<br>919-733-0823<br>919-715-7468 (F)<br>800-829-4841 (national)<br>edythe_mckinney@p2pays.org<br>www.p2pays.org | Karen Davis<br>Office of the Small Business Ombudsman<br>Department of Environment, Health, and<br>Natural Resources<br>2728 Capital Boulevard<br>P.O. Box 29583<br>Raleigh, NC 27604<br>919-733-1267<br>919-715-6794 (F)<br>800-829-4841 (national)                  |  |
| NORTH DAKOTA<br>(M)   | Jeff Burgess<br>North Dakota Department of Health<br>P.O. Box 5520<br>1200 Missouri Avenue<br>Bismark, ND 58506<br>701-328-5153<br>701-328-5200 (F)<br>800-755-1625 (state)<br>jburgess@state.nd.us<br>www.health.state.nd.us  | Tom Bachman<br>North Dakota Department of Health<br>Division of Environmental Engineering<br>P.O. Box 5520<br>1200 Missouri Avenue<br>Bismark, ND 58506<br>701-328-5188<br>701-328-5200 (F)<br>800-755-1625 (state)<br>tbachman@state.nd.us<br>www.health.state.nd.us | Dana Mount<br>North Dakota Department of Health<br>Division of Environmental Engineering<br>P.O. Box 5520<br>1200 Missouri Avenue<br>Bismark, ND 58506<br>701-328-5188<br>701-328-5200 (F)<br>800-755-1625 (state)<br>dmount@state.nd.us<br>www.health.state.nd.us |
| OHIO<br>(A)           | Mark Shanahan<br>Clean Air Resource Center<br>50 West Broad Street, Suite 1901<br>Columbus, OH 43215-5985<br>614-728-3540<br>614-752-9188 (F)<br>800-225-5051 (state)<br>mark.shanahan@aqda.state.oh.us<br>www.state.oh.us/carc/   | Rick Carleski<br>Ohio EPA/DAPC<br>Lazarus Government Center<br>P.O. Box 1049<br>Columbus, OH 43216<br>614-728-1742<br>614-644-3681 (F)<br>614-644-4830 (state)<br>rcarlesk@epa.state.oh.us<br>www.epa.ohio.gov/dapc/sba/sbaintro                                      | Bob Hodanbosi<br>Ohio EPA/DAPC<br>Lazarus Government Center<br>P.O. Box 1049<br>Columbus, OH 43216<br>614-644-2270<br>614-644-3681 (F)   |



**TABLE D-1  
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| STATE               | OMBUDSMAN   | SBAP   | OTHER SBAP  |
|---------------------|---|--|---|
| OKLAHOMA<br>(M)     | Steve Thompson<br>Deputy Executive Director<br>OK Department of Environmental Quality<br>P.O. Box 1677<br>Oklahoma City, OK 73101-1677<br>405-702-7100<br>405-702-7101 (F)<br>Steve.Thompson@deqmail.state.ok.us<br>www.deq.state.ok.us | Alwin Ning<br>Customer Services Division<br>OK Department of Environmental Quality<br>P.O. Box 1677<br>Oklahoma City, OK 73101-1677<br>405-702-6100<br>405-702-1317 (F)<br>800-869-1400 (national)<br>alwin.ning@deqmail.state.ok.us | Kyle Arthur<br>Customer Services Division<br>OK Department of Environmental Quality<br>1000 NE 10th Street<br>Oklahoma City, OK 73117-1212<br>405-702-9116<br>405-702-9101 (F)<br>800-869-1400 (national)<br>kyle.arthur@deqmail.state.ok.us<br>www.deq.state.ok.us |
| OREGON<br>(A)       | Paul Burnet<br>OR DEQ<br>811 SW 6th Avenue<br>Portland, OR 97204-1390<br>503-229-5776<br>503-229-6945 (F)<br>800-452-4011 (state)<br>burnet.paul@deq.state.or.us<br>www.deq.state.or.us   | Jill Inahara<br>OR DEQ<br>Air Quality Division<br>811 SW 6th Avenue<br>Portland, OR 97204<br>503-229-6147<br>503-229-5675 (F)<br>800-452-4011 (state)<br>inahara.jill@deq.state.or.us<br>www.deq.state.or.us                         |   |
| PENNSYLVANIA<br>(M) | Greg Czarnecki<br>Office of P2 & Compliance Assistance<br>PA DEP<br>RCSOB, 15th Floor<br>P.O. Box 8772<br>Harrisburg, PA 17105<br>717-772-8951<br>717-783-2703 (F)<br>Czarnecki.Gregory@dep.state.pa.us<br>www.dep.state.pa.us          | Scott Kepner<br>Bureau of Air Quality<br>PA DEP<br>P.O. Box 8468<br>Harrisburg, PA 17105-8468<br>717-787-1663<br>717-772-2303 (F)<br>Kepner.Scott@dep.state.pa.us<br>www.dep.state.pa.us   | Cecily Beall<br>PRC Environmental Management, Inc.<br>1800 JFK Boulevard, 6th Floor<br>Philadelphia, PA 19103<br>215-656-8709<br>215-972-0484 (F)<br>800-722-4743 (national)<br>beallic@prcemi.com  |
| PUERTO RICO<br>(A)  | Tomas DeLeon<br>Administrator, Commercial Development<br>Administration<br>P.O. Box 4275<br>San Juan, PR 00902<br>787-724-1451<br>787-722-8477 (F)  | Maria Rivera<br>PREQB -Air Quality Area<br>Ponce De Leon 431<br>Hato Rey Pr.<br>P.O. Box 11488<br>Santurce, PR 00910<br>787-767-8025, x296<br>787-756-5906 (F)<br>jcaaire@prtc.net   | Alejandro Franco<br>Puerto Rico SBAP<br>P.O. Box 9024275<br>San Juan, PR 00902-4275<br>787-721-3290   |

**TABLE D-1  
(Continued)**

| STATE                 | OMBUDSMAN  | SBAP  | OTHER SBAP  |
|-----------------------|--|---|---|
| RHODE ISLAND<br>(M)   | Roger Greene<br>RI DEM, Director's Office<br>235 Promenade Street, Suite 425<br>Providence, RI 02908<br>401-222-2771 x2402<br>401-222-6802 (F)<br>800-932-1000 (state)<br>rgreen@doa.state.ri.us<br>www.state.ri.us/dem  | Pam Annarummo<br>RI DEM, Office of Technical & Customer Assistance<br>235 Promenade Street, Suite 250<br>Providence, RI 02908<br>401-222-6822, x7204<br>401-222-3810 (F)<br>annarump@doa.state.ri.us<br>www.state.ri.us/dem   | Joe Antonio<br>RI Department of Environmental Management<br>Technical/Customer Assistance<br>235 Promenade Street<br>Providence, RI 02908<br>401-222-6822, x4410<br>401-277-3810 (F)<br>800-253-2674 (state)<br>jantonio@doa.state.ri.us<br>www.state.ri.us/dem                       |
| SOUTH CAROLINA<br>(M) | Phyllis T. Copeland, SBO<br>SC Department of Health & Environmental Control<br>2600 Bull Street<br>Columbia, SC 29201<br>803-898-3997<br>803-898-3939 (F)<br>800-819-9001 (national)<br>copelapt@columb30.dhec.state.sc.us<br>www.state.sc.us/eqc/admin/html/sbap.html                     | Rose Stancil<br>SBAP Technical Engineer Assistant<br>SC Department of Health & Environmental Control<br>2600 Bull Street<br>Columbia, SC 29201<br>803-898-3981<br>803-898-3939 (F)<br>800-819-9001 (national)<br>stancirr@columb30.dhec.state.sc.us<br>www.state.sc.us/eqc/admin/html/sbap.html | Willie Morgan, PE<br>Permitting Liaison<br>SC Department of Health & Environmental Control<br>2600 Bull Street<br>Columbia, SC 29201<br>803-898-3957<br>803-898-3939 (F)<br>800-819-9001 (national)<br>morganwj@columb30.dhec.state.sc.us<br>www.state.sc.us/eqc/admin/html/sbap.html |
| SOUTH DAKOTA<br>(M)   | Joe D. Nadenicek<br>Small Business Ombudsman<br>SD Department of Environment & Natural Resources<br>Joe Foss Building<br>523 East Capitol<br>Pierre, SD 57501<br>605-773-3836<br>605-773-6035 (F)<br>800-GET-DENR (7 state access in area)<br>joe.nadenicek@state.sd.us<br>www.state.sd.us | Brian Gustafson<br>SD Department of Environment & Natural Resources<br>Joe Foss Building<br>523 East Capitol<br>Pierre, SD 57501<br>605-773-7171<br>605-773-5286 (F)<br>800-GET-DENR (7 state access in area)<br>brian.gustafson@state.sd.us<br>www.state.sd.us                                 |   |
| TENNESSEE<br>(M)      | Ernest Blankenship<br>TN Department of Environment & Conservation<br>L&C Annex, 8th Floor<br>401 Church Street<br>Nashville, TN 37243<br>615-532-6262<br>615-532-8007 (F)<br>800-734-3619 (national)<br>eblankenship@mail.state.tn.us<br>www.state.tn.us/environment                       | Linda Sadler<br>Small Business Assistance Program<br>L&C Annex, 8th Floor<br>401 Church Street<br>Nashville, TN 37243<br>615-532-8012<br>615-532-8007 (F)<br>800-734-3619 (national)<br>lsadler@mail.state.tn.us<br>www.state.tn.us/environment   |   |

**TABLE D-1  
(Continued)**

| STATE           | OMBUDSMAN  | SBAP   | OTHER SBAP   |
|-----------------|--|--|--|
| TEXAS<br>(M)    | Israel Anderson<br>Small Business Ombudsman/Advocate<br>TNRCC (Mail Code 112)<br>P.O. Box 13087<br>Austin, TX 78711-3087<br>512-239-5319<br>512-239-3165 (F)<br>800-447-2827 (national)<br>ianderso@tnrcc.state.tx.us  | Tamra-Shae Oatman, Manager<br>TNRCC (Mail Code 106)<br>P.O. Box 13087<br>Austin, TX 78711-3087<br>512-239-1066<br>512-239-1065 (F)<br>800-447-2827 (national)<br>toatman@tnrcc.state.tx.us<br>www.tnrcc.state.tx.us/exec/small_business  | Bridget Bohac<br>TNRCC (Mail Code 106)<br>P.O. Box 13087<br>Austin, TX 78711-3087<br>512-239-1066<br>512-239-1065 (F)<br>800-447-2827 (national)<br>bbohac@tnrcc.state.tx.us<br>www.tnrcc.state.tx.us/exec/small_business  |
| UTAH<br>(M)     | Stephanie Bernkopf<br>UT Department of Environmental Quality<br>Office of Planning & Public Affairs<br>168 North 1950 West<br>Salt Lake City, UT 84114-4810<br>801-536-4479<br>801-536-0061 (F)<br>800-458-0145<br>sbernkop@deq.state.ut.us<br>www.deq.state.ut.us/eoqas/bus_home.htm        | Ron Reece, Environmental Engineer<br>UT Department of Environmental Quality<br>Division of Air Quality<br>150 North 1950 West<br>P.O. Box 144820<br>Salt Lake City, UT 84114<br>801-536-4091<br>801-536-4099 (F)<br>800-270-4440 (national)<br>rreece@deq.state.ut.us<br>www.deq.state.ut.us/eqair/permits/sbap3.htm |  |
| VERMONT<br>(M)  |  | Judy Mirro<br>VT DEC Environmental Assistance Division<br>Laundry Building<br>103 South Main Street<br>Waterbury, VT 05671<br>802-241-3745<br>802-241-3273 (F)<br>800-974-9559 (state)<br>judym@dec.anr.state.vt.us<br>www.anr.state.vt.us/dec/ead/eadhome.htm   | Kevin Bracey (not specific to small business assistance)<br>VT Air Pollution Control Division<br>Building 3 South<br>103 South Main Street<br>Waterbury, VT 05671<br>802-241-3841<br>802-241-2590 (F)<br>kevinb@qtm.anr.state.vt.us<br>www.anr.state.vt.us/dec/air/default.htm |
| VIRGINIA<br>(M) | John Daniel, Jr., Director, Air Program<br>Coordination<br>VA Department of Environmental Quality<br>P.O. Box 10009<br>629 E. Main Street<br>Richmond, VA 23240<br>804-698-4311<br>804-698-4510 (F)<br>800-592-5482 (state)<br>jmdaniel@deq.state.va.us<br>www.deq.state.va.us/osba/smallbiz | Richard Rasmussen<br>Manager, Small Business Assistance<br>Program<br>VA Department of Environmental Quality<br>P.O. Box 10009<br>629 E. Main Street<br>Richmond, VA 23240<br>804-698-4394<br>804-698-4510 (F)<br>800-592-5482 (state)<br>rgrasmusse@deq.state.va.us<br>www.deq.state.va.us/osba/smallbiz            |  |

**TABLE D-1  
(Continued)**

| STATE                            | OMBUDSMAN   | SBAP  | OTHER SBAP   |
|----------------------------------|---|---|--|
| VIRGIN ISLANDS<br>(A)            | Marylyn A. Stapleton<br>VI Department of Planning & Natural Resources<br>Division of Environmental Protection<br>Wheatley Shopping Center II<br>Charlotte Amalie, St. Thomas, VI 00802<br>340-777-4577, x228<br>340-774-5416 (F)                                | Marylyn A. Stapleton<br>Dual role SBO/SBAP  | Jasmine A. Blyden<br>VI Department of Planning & Natural Resources<br>Division of Environmental Protection<br>Wheatley Shopping Center II<br>Charlotte Amalie, St. Thomas, VI 00802<br>340-777-4577<br>340-774-5416 (F)                  |
| WASHINGTON<br>(A)                | Leighton Pratt<br>WA Department of Ecology<br>Air Quality Program<br>P.O. Box 47600<br>Olympia, WA 98504-7600<br>360-407-7018<br>360-407-6802 (F)<br>lpra461@ecy.wa.gov<br>www.wa.gov/ecology   | Bernard Brady<br>WA Department of Ecology<br>Air Quality Program<br>P.O. Box 47600<br>Olympia, WA 98504-7600<br>360-407-6803<br>360-407-6802 (F)<br>bbra461@ecy.wa.gov<br>www.wa.gov/ecology  |  |
| WEST VIRGINIA<br>(M-SBO; A-SBAP) | Kenneth Shaw<br>WV Division of Environmental Protection<br>Office of Air Quality<br>1558 Washington Street, E<br>Charleston, WV 25311<br>304-558-4022 x235<br>304-558-3287 (F)<br>800-982-2474 (state)<br>kshaw@mail.dep.state.wv.us<br>www.dep.state.wv.us/oaq | Fred Durham<br>WV Division of Environmental Protection<br>Office of Air Quality<br>1558 Washington Street, E<br>Charleston, WV 25311<br>304-558-1217<br>304-558-1222 (F)<br>800-982-2474 (state)<br>fdurham@mail.dep.state.wv.us<br>www.dep.state.wv.us/oaq |  |
| WISCONSIN<br>(A)                 | Hampton Rothwell<br>WI Department of Commerce<br>201 W. Washington Avenue<br>P.O. Box 7970<br>Madison, WI 53703<br>608-267-0313<br>608-267-0436 (F)<br>800-435-7287 (national)<br>hrothwell@commerce.state.wi.us<br>www.commerce.state.wi.us                    | Pam Christenson<br>Technical Assistance Director<br>Department of Commerce<br>WI SBAP, 6th Floor<br>201 West Washington Avenue<br>Madison, WI 53703<br>608-267-9214<br>608-267-0436 (F)<br>800-435-7287 (national)<br>pchristenson@commerce.state.wi.us     | Cliff Fleener<br>WI Department of Commerce<br>201 W. Washington Avenue<br>P.O. Box 7970<br>Madison, WI 53703<br>608-264-6153<br>608-267-0436 (F)<br>800-435-7274 (national)<br>cfleener@commerce.state.wi.us<br>www.commerce.state.wi.us |

**TABLE D-1  
(Continued)**

| STATE          | OMBUDSMAN   | SBAP  | OTHER SBAP  |
|----------------|---|---|---|
| WYOMING<br>(M) | Dan Clark<br>WY Department of Environmental Quality<br>Small Business Ombudsman<br>Herschler Building 4-W<br>122 W. 25th Street<br>Cheyenne, WY 82002<br>307-777-7388<br>307-777-3610 (F)<br>dclark@missc.state.wy.us<br>http://deq.state.wy.us | Charles Raffelson<br>WY Department of Environmental Quality<br>Technical Assistance Program Coordinator<br>Herschler Building 4-W<br>122 W. 25th Street<br>Cheyenne, WY 82002<br>307-777-7347<br>307-777-3610 (F)<br>craffe@missc.state.wy.us<br>http://deq.state.wy.us | Tina Jenkins<br>Environmental Program Principal, Rule<br>Making and Air Toxics<br>Department of Environmental Quality<br>Sheridan Field Office<br>1043 Coffeen Ave, Ste D<br>307-672-6457<br>307-674-6050 (F)<br>cjenki@missc.state.wy.us<br>http://deq.state.wy.us |

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

| STATE OR TERRITORY   | MONTH & YEAR OF ESTABLISHMENT        |             |       | MONTH & YEAR OPERATIONS BEGAN        |             |       |
|----------------------|--------------------------------------|-------------|-------|--------------------------------------|-------------|-------|
|                      | SBO                                  | SBAP        | CAP   | SBO                                  | SBAP        | CAP   |
| Alabama              | 5/93                                 | 7/94        | 7/97  | 5/93                                 | 7/94        | N/R   |
| Alaska               | 6/95                                 | 6/95        | 6/95  | 6/95                                 | 6/95        | 11/95 |
| Arizona              | 1/93                                 | 1/93        | 1/93  | 1/93                                 | 3/94        | N/O   |
| Maricopa Cty         | N/R                                  | 1/95        | N/R   | N/R                                  | 1/95        | N/R   |
| Arkansas             | 11/93                                | 11/93       | 6/95  | 11/93                                | 11/93       | 6/95  |
| California           | 10/92                                | before 1990 | N/E   | 4/95                                 | before 1990 | N/O   |
| South Coast          | 6/89*                                | 6/89*       | 2/98* | 6/89*                                | 6/89*       | 2/98* |
| Colorado             | 12/97                                | 7/92        | 7/92  | 12/97                                | 9/92        | 4/94  |
| Connecticut          | 4/93                                 | 4/93        | 12/94 | 4/93                                 | 4/93        | 12/94 |
| Delaware             | 12/95                                | 12/95       | 4/98  | 12/95                                | 12/95       | 4/98  |
| District of Columbia | 12/94                                | 12/93       | 2/96  | 9/95                                 | 1/94        | 2/98  |
| 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               | 7/98                                 | 7/98        | N/E   | 7/98                                 | 7/98        | N/O   |
| Idaho                | 10/93                                | 4/94        | 5/94  | 10/93                                | 4/94        | 5/94  |
| Illinois             | 5/92                                 | 9/92        | 9/98  | 5/92                                 | 11/94       | 9/98  |
| Indiana              | 3/93                                 | 1/95        | 7/95  | 3/93                                 | 3/94        | 7/95  |
| Iowa                 | 10/94                                | 10/92       | N/E   | 10/94                                | 10/92       | N/O   |
| Kansas               | 7/93                                 | 7/93        | 7/93  | 11/93                                | 3/94        | 12/93 |
| Kentucky             | 6/92 (part time)<br>2/95 (full time) | 7/94        | 10/94 | 6/92 (part time)<br>2/95 (full time) | 10/94       | 3/95  |

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

**TABLE D-2  
(Continued)**

| STATE OR<br>TERRITORY | MONTH & YEAR OF ESTABLISHMENT |        |                 | MONTH & YEAR OPERATIONS BEGAN |        |                 |
|-----------------------|-------------------------------|--------|-----------------|-------------------------------|--------|-----------------|
|                       | SBO                           | SBAP   | CAP             | SBO                           | SBAP   | CAP             |
| Jefferson Cty         | 8/95                          | 11/95  | See state resp. | 8/95                          | 11/95  | See state resp. |
| Louisiana             | 11/92                         | 11/92  | 10/93           | 11/92                         | 11/92  | 10/93           |
| Maine                 | 10/93                         | 10/93  | 10/93           | 11/93                         | 4/94   | 4/94            |
| Maryland              | 4/94                          | 4/94   | N/E             | 4/94                          | 4/94   | N/O             |
| Massachusetts         | N/E                           | 11/92* | N/E             | N/O                           | 11/92* | N/O             |
| Michigan              | 10/95                         | 9/94   | 9/94            | 10/95                         | 9/94   | 9/94            |
| Minnesota             | 4/92                          | 4/92   | 4/92            | 6/93                          | 8/93   | 9/93            |
| Mississippi           | 7/93                          | 7/93   | 7/93            | 7/93                          | 7/93   | 7/93            |
| Missouri              | 8/92                          | 8/92   | 8/92            | 5/94                          | 5/94   | 4/98            |
| Montana               | 12/93                         | 12/93  | 1/94            | 12/93                         | 12/93  | 3/94            |
| Nebraska              | 11/92                         | 11/92  | 7/93            | 11/92                         | 11/92  | 7/93            |
| Nevada                | 1/95                          | 1/95   | 12/95           | 3/95                          | 1/95   | 1/95            |
| New Hampshire         | 11/94                         | 1/93   | 11/95           | 11/94                         | 1/93   | 3/96            |
| New Jersey            | 3/93                          | 11/92  | 12/95           | 3/93                          | 11/92  | 1/97            |
| New Mexico            | 10/92                         | 10/92  | 10/94           | 9/94                          | 1/93   | 11/95           |
| New York              | 4/92                          | 4/92   | 7/94            | 1/93                          | 4/92   | 8/97            |
| North Carolina        | 1/93                          | 8/93   | 11/94           | 1/93                          | 8/93   | 11/94           |
| North Dakota          | 4/92                          | 4/92   | 5/92            | 4/92                          | 4/92   | 6/93            |
| Ohio                  | 10/94                         | 10/94  | 10/94           | 12/94                         | 4/95   | 1/96            |
| Oklahoma              | 6/94                          | 6/94   | 6/96            | 10/94                         | 10/94  | 6/96            |

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

**TABLE D-2  
(Continued)**

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

\*Notes:

South Coast, CA      SBO function, SBAP, and CAP (local government and small business committee) are combined.



**TABLE D-2  
(Continued)**

- MA**    **SBAP establishment:** OTA established 1/90 to provide technical assistance in pollution prevention for all media (predecessor office operating in the 1980s had nominal focus on hazardous waste). Since 11/92, MA SIP designated OTA as lead for SBAP in coordination with other services at DEP.
- SBAP operations:** In 11/92, OTA was assigned to serve as the designated office under CAA. Since 1/90, OTA has provided multimedia technical assistance to all toxics-using businesses, including small businesses. Since 1987, the Office of Safe Waste Management provided similar assistance, focusing on waste, but covering air issues to some extent because of source reduction approach.
- RI**    Up until this time, the Department's existing Pollution Prevention Program staff had been responding to industry inquiries.

**TABLE D-3**  
**1998 SBTCP BUDGET INFORMATION AND FUNDING SOURCES**

| STATE OR TERRITORY   | 1998 BUDGET (\$) |         |       |           | SOURCE OF FUNDING   |  |              |
|----------------------|------------------|---------|-------|-----------|---|--|--------------|
|                      | SBO              | SBAP    | CAP   | TOTAL     | SBO   | SBAP   | CAP          |
| Alabama              | 175,000          | 165,000 | N/R   | 340,000   | Title V fees; air, water, & RCRA grant funds  | Title V fees, air permit fees  | N/R          |
| Alaska               | 118,100          |         |       | 118,100   | All funds come from the AK Clean Air Protection Fund that was established to fund AK's Title V program.   |  |              |
| Arizona              | 175,000          |         | N/R   | 175,000   | Air quality permit fees   |  |              |
| Maricopa County      | N/R              | 133,350 | N/R   | 133,350   | N/R   | Permit fees  | N/R          |
| Arkansas             | 64,500           | 264,500 | 2,500 | 331,500   | Permit fees & overhead  | Permit fees & miscellaneous grants   | Permit fees  |
| California           | 200,000          | 340,000 | 0     | 540,000   | State budget act  | State budget act   | N/A          |
| South Coast          | 1,310,000        |         |       | 1,310,000 | Emissions fees, permit fees, annual operating fees, subvention funds.                                     |  |              |
| Colorado             | 60,000           | 250,000 | 0     | 310,000   | N/A   | CDPHE Air Pollution Control Division, stationary sources (permitting & annual emission fees) | N/A          |
| Connecticut          | 325,000          |         |       | 325,000   | State fund that supports programs related to CAA implementation, vehicle registration fees, Title V fees. |  |              |
| Delaware             | 80,000           |         |       | 80,000    | Title V fees  |  |              |
| District of Columbia | 5,000            | 8,000   | 3,000 | 16,000    | Air grant, Title V fees   | Air grant, Title V fees  | Title V fees |
| Florida              | 222,400          |         |       | 222,400   | Title V fees, EPA grants  |  |              |
| Georgia              | 50,000           | 125,000 | 5,000 | 180,000   | Title V fees  | Title V fees   | Title V fees |

N/A    Not applicable    N/R    No response

**TABLE D-3  
(Continued)**

| STATE OR TERRITORY | 1998 BUDGET (\$) |          |                                 |         | SOURCE OF FUNDING                           |   |  |
|--------------------|------------------|----------|---------------------------------|---------|---|---|--|
|                    | SBO              | SBAP     | CAP                             | TOTAL   | SBO   | SBAP  | CAP                                    |
| Hawaii             | 100,000          | 60,000   | N/A                             | 160,000 | Title V fees (special fund)                 | Title V fees (special fund)   | N/A                                    |
| Idaho              | 66,950           | 30,900   | 0                               | 97,850  | Title V fees                                | Title V fees, air base grant  | N/A                                    |
| Illinois           | 75,000           | 350,000  | 500                             | 425,000 | GRF   | Title V fees  | Title V fees                           |
| Indiana            | 150,000          | 700,000  | 3,000                           | 853,000 | Special fund, permit fees, general revenues | Special fund, permit fees, general revenues   | Legislature                            |
| Iowa*              | 81,200           | 397,000  | 0                               | 478,200 | Title V fees                                | Title V fees  | N/A                                    |
| Kansas             | 125,000          | 429,443  | No budget-only travel allowance | 554,443 | Air fee funds, pollution prevention funds   | Air fee funds, hazardous waste fee funds, nonpoint source funds, remediation fee funds-multimedia program | Air fee funds                          |
| Kentucky           | 123,200          | 270,400  | Inc. in SBO budget              | 393,600 | Title V fees                                | Title V fees  | Title V fees                           |
| Jefferson County   | 40,000           | 85,000   | See state resp.                 | 125,000 | EPA 105 grant & general funds               | EPA 105 grant & general funds   | N/R                                    |
| Louisiana          | 0                | 400,000  | 0                               | 400,000 | Funded by other programs                    | N/R   | N/A                                    |
| Maine              | 40,000           | 114,000  | As needed                       | 154,000 | General fund                                | Title V fees, fees from Toxics Use Reduction program  | Fees from Toxics Use Reduction Program |
| Maryland           | 3,500            | 61,000   | N/A                             | 64,500  | MDE indirect funds                          | MDE indirect funds  | N/A                                    |
| Massachusetts      | N/A              | 360,000* | N/A                             | 360,000 | N/A   | Toxic Use Reduction Act fees  | N/A                                    |

**TABLE D-3  
(Continued)**

| STATE OR TERRITORY | 1998 BUDGET (\$) |           |        |           | SOURCE OF FUNDING                                 |   |   |
|--------------------|------------------|-----------|--------|-----------|---|---|---|
|                    | SBO              | SBAP      | CAP    | TOTAL     | SBO   | SBAP  | CAP   |
| Michigan           | 71,300           | 416,400   | 0      | 487,700   | State & county fees, restricted funds             | State & county fees, restricted funds             | Unfunded  |
| Minnesota          | 75,000           | 225,000   | 1,000  | 300,000   | Air fees, 105 grant                               | Air fees, 105 grant, SBREFA 215 grant             | Air fees, 105 grant                               |
| Mississippi        | 150,000          | 150,000   | 5,000  | 305,000   | Title V fees                                      | Title V fees                                      | Title V fees                                      |
| Missouri           | 52,000           | 440,000   | 10,000 | 502,000   | Title V & other fees                              | Title V fees, general revenue, federal grant      | Title V fees                                      |
| Montana            | 91,595           | 38,405    | 1,000  | 131,000   | Air permit fees                                   | Air permit fees                                   | Air permit fees                                   |
| Nebraska           | 0                | 105,000   | 0      | 105,000   | SBO/SBAP same person                              | Title V fees                                      | N/R   |
| Nevada             | 92,272           | 168,812   | 2,600  | 263,684   | Indirect cost pool                                | Indirect cost pool, federal grant (PPL)           | Air Quality Management Fund (permit fees)         |
| New Hampshire      | 25,000           | 75,000    |        | 100,000   | Emission fees                                     | Emission fees                                     | N/A   |
| New Jersey         | 80,000           | 70,000    | 1,500  | 151,500   | Operating permit fees                             | Operating permit fees                             | Operating permit fees                             |
| New Mexico         | 10,000           | 205,000   | <1,000 | 216,000   | Title V fees, other state funds                   | Title V fees, grants, other state funds           | Title V fees, other state funds                   |
| New York           | 1,170,000        | 1,000,000 | 4,000  | 2,174,000 | NY State Clean Air fund supported by Title V fees | NY State Clean Air fund supported by Title V fees | NY State Clean Air fund supported by Title V fees |
| North Carolina     | 322,000          |           | 3,000  | 325,000   | Title V fees                                      |   | Title V fees                                      |
| North Dakota       | 30,000           | 30,000    | 1,000  | 61,000    | Title V fees                                      | Title V fees                                      | Title V fees                                      |
| Ohio               | 208,000          | 229,000   |        | 437,000   | Title V fees, parent agent subsidy                | Title V fees, CAP budget included in SBAP budget  |   |

N/A      Not applicable      N/R      No response

**TABLE D-3  
(Continued)**

| STATE OR TERRITORY | 1998 BUDGET (\$) |         |        |         | SOURCE OF FUNDING                                  |  |                               |
|--------------------|------------------|---------|--------|---------|--|--|-------------------------------|
|                    | SBO              | SBAP    | CAP    | TOTAL   | SBO  | SBAP   | CAP                           |
| Oklahoma           | 14,000           | 147,992 |        | 162,000 | Agency indirect costs                              | Title V fees, EPA leadership grant; CAP budget included w/SBAP |                               |
| Oregon             | 35,000           | 97,800  | 2,300  | 135,100 | Title V fees                                       | Title V fees   | Title V fees                  |
| Pennsylvania       | 90,000           | 560,000 | 5,000  | 655,000 | Title V fees                                       | Title V fees   | Title V fees                  |
| Puerto Rico        | N/R              | 220,100 | N/R    | 220,100 | N/R  | Title V funds fully assigned by EQB Air Program                | N/R                           |
| Rhode Island       | 49,000           | 115,000 | 0      | 164,000 | State general fund                                 | Title V fees   | N/A                           |
| South Carolina     | 40,000           | 78,000  | 1,500  | 119,500 | Title V fees                                       | Title V fees   | Title V fees                  |
| South Dakota       | 25,000           | 10,000  | 5,000  | 40,000  | Title V fees                                       | Title V fees   | Title V fees                  |
| Tennessee          | 201,900          |         | N/A    | 201,900 | Title V fees                                       |  | Not operational               |
| Texas              | 987,140*         |         |        | 987,140 | 151 grant funds                                    |  |                               |
| Utah               | 54,000           | 148,000 | 2,000  | 204,000 | Title V fees, EPA Partnership for Compliance grant | Title V fees   | Title V fees                  |
| Vermont            | 0                | 60,000  | 5,000  | 65,000  | N/R  | State of VT general fund                                       | State of VT general fund      |
| Virginia           | 10,000           | 285,000 | 5,000  | 300,000 | General funds                                      | Permit fees, federal trust                                     | Permit fees                   |
| Virgin Islands     | 150,000          | 150,000 | N/A    | 300,000 | Title V fees                                       | Title V fees   | N/R                           |
| Washington         | 40,000           | 200,000 | 5,000  | 245,000 | Title V fees                                       | Title V fees   | Title V fees                  |
| West Virginia      | 50,000           | 140,000 | 5,000* | 195,000 | Title V fees, agency penalties                     | Title V fees, agency penalties                                 | Agency penalties              |
| Wisconsin          | 30,000           | 117,000 | 3,000  | 150,000 | General purpose revenue                            | Program revenue (permit fees)                                  | Program revenue (permit fees) |

**TABLE D-3  
(Continued)**

| STATE OR<br>TERRITORY | 1998 BUDGET (\$) |        |        |         | SOURCE OF FUNDING |              |              |
|-----------------------|------------------|--------|--------|---------|-------------------|--------------|--------------|
|                       | SBO              | SBAP   | CAP    | TOTAL   | SBO               | SBAP         | CAP          |
| Wyoming               | 25,000           | 75,000 | 10,000 | 110,000 | Title V fees      | Title V fees | Title V fees |

**\*Notes:**

IA Budget for FY99 (7/98-6/99).

MA OTA assists companies (large and small) with multimedia P2 improvements. Best estimate is \$360,000 of OTA's budget is devoted to SBAP activities. Toxics Use Reduction Act fees support the activities of the Office of Technical Assistance. These fees are from large quantity toxics users, which must file under the act. No CAA funding used.

TX Combined budget for SBO, SBAP, and CAP, and is for FY98.

WV Expense reimbursement only. Actual yearly expenses <\$1,000.

**TABLE D-4  
COMPARISON OF 1997, 1998, AND 1999 BUDGETS  
and  
DESCRIPTIONS OF SIGNIFICANT FUNDING CHANGES**

| STATE OR TERRITORY    | BUDGET FOR 1997 REPORTING PERIOD (\$) |         |           |           | BUDGET FOR 1998 REPORTING PERIOD (\$) |         |            |           | BUDGET FOR 1999 REPORTING PERIOD (\$) |         |            |         |
|-----------------------|---------------------------------------|---------|-----------|-----------|---------------------------------------|---------|------------|-----------|---------------------------------------|---------|------------|---------|
|                       | SBO                                   | SBAP    | CAP       | TOTAL     | SBO                                   | SBAP    | CAP        | TOTAL     | SBO                                   | SBAP    | CAP        | TOTAL   |
| Alabama               | 165,000                               | 165,000 | N/R       | 330,000   | 175,000                               | 165,000 | N/R        | 340,000   | 180,000                               | 181,500 | N/R        | 361,500 |
| Alaska                | 118,100                               |         |           | 118,100   | 118,100                               |         |            | 118,100   | 118,100                               |         |            | 118,100 |
| Arizona               | 165,000                               |         | N/R       | 165,000   | 175,000                               |         | N/R        | 175,000   | 185,000                               |         | N/R        | 185,000 |
| Maricopa County       | N/R                                   | 122,000 | N/R       | 122,000   | N/R                                   | 133,500 | N/R        | 133,500   | N/R                                   | 141,300 | N/R        | 141,300 |
| Arkansas*             | 78,210                                | 233,068 | 1,564     | 312,842   | 64,500                                | 264,500 | 2,500      | 331,500   | 70,950                                | 277,725 | 2,625      | 351,300 |
| California            | 200,000                               | 340,000 | 0         | 540,000   | 200,000                               | 340,000 | 0          | 540,000   | 200,000                               | 340,000 | N/A        | 540,000 |
| South Coast*          | 1,210,000                             |         |           | 1,210,000 | 1,310,000                             |         |            | 1,310,000 | 850,000                               |         |            | 850,000 |
| Colorado*             | 90,000                                | 120,000 | 0         | 210,000   | 60,000                                | 250,000 | 0          | 310,000   | 60,000                                | 250,000 | 0          | 310,000 |
| Connecticut*          | 325,000                               |         |           | 325,000   | 325,000                               |         |            | 325,000   | 325,000                               |         |            | 325,000 |
| Delaware              | 80,000                                |         |           | 80,000    | 80,000                                |         |            | 80,000    | 80,000                                |         |            | 80,000  |
| District of Columbia* | 5,000                                 | 8,000   | 0         | 13,000    | 5,000                                 | 8,000   | 3,000      | 16,000    | 0                                     | 8,000   | 2,000      | 10,000  |
| Florida*              | 151,200                               |         |           | 151,200   | 222,400                               |         |            | 222,400   | 110,600                               |         |            | 110,600 |
| Georgia               | 65,000                                | 115,000 | 10,000    | 190,000   | 50,000                                | 125,000 | 5,000      | 180,000   | 50,000                                | 135,000 | 10,000     | 195,000 |
| Hawaii                | N/A                                   | N/A     | N/A       | 0         | 100,000                               | 60,000  | N/A        | 160,000   | 100,000                               | 85,000  | 10,000     | 195,000 |
| Idaho                 | 65,000                                | 30,000  | 0         | 95,000    | 66,950                                | 30,900  | 0          | 97,850    | 66,950                                | 30,900  | 0          | 97,850  |
| Illinois*             | 70,000                                | 325,000 | 0         | 395,000   | 75,000                                | 350,000 | 500        | 425,000   | 75,000                                | 375,000 | 2,000      | 452,000 |
| Indiana               | 150,000                               | 700,000 | 3,000     | 853,000   | 150,000                               | 700,000 | 3,000      | 853,000   | 150,000                               | 700,000 | 3,000      | 853,000 |
| Iowa*                 | 81,000                                | 362,000 | 0         | 443,000   | 81,200                                | 397,000 | 0          | 478,200   | 81,400                                | 361,000 | N/A        | 442,000 |
| Kansas*               | 125,000                               | 340,000 | 0         | 465,000   | 125,000                               | 429,443 | 0          | 554,443   | 125,000                               | 430,000 | N/R        | 555,000 |
| Kentucky              | 112,800                               | 262,500 | 2,000     | 377,300   | 123,200                               | 270,400 | Inc. w/SBO | 393,600   | 129,400                               | 278,500 | Inc. w/SBO | 407,900 |
| Jefferson Cty         | 40,000                                | 85,000  | See KY    | 125,000   | 40,000                                | 85,000  | See KY     | 125,000   | 40,000                                | 85,000  | See KY     | 125,000 |
| Louisiana             | 0                                     | 400,000 | 0         | 400,000   | 0                                     | 400,000 | 0          | 400,000   | 0                                     | 400,000 | 0          | 400,000 |
| Maine*                | 40,000                                | 75,000  | As needed | 115,000   | 40,000                                | 114,000 | As needed  | 154,000   | 40,000                                | 114,000 | As needed  | 154,000 |
| Maryland              | 3,500                                 | 61,000  | 0         | 64,500    | 3,500                                 | 61,000  | N/A        | 64,500    | 3,500                                 | 61,000  | 0          | 64,500  |
| Massachusetts*        | N/A                                   | 360,000 | N/A       | 360,000   | N/A                                   | 360,000 | N/A        | 360,000   | N/A                                   | 360,000 | N/A        | 360,000 |

N/A      Not applicable      N/R      No response

**TABLE D-4  
(Continued)**

| STATE OR TERRITORY | BUDGET FOR 1997 REPORTING PERIOD (\$) |           |                |           | BUDGET FOR 1998 REPORTING PERIOD (\$) |           |                |           | BUDGET FOR 1999 REPORTING PERIOD (\$) |           |                |         |
|--------------------|---------------------------------------|-----------|----------------|-----------|---------------------------------------|-----------|----------------|-----------|---------------------------------------|-----------|----------------|---------|
|                    | SBO                                   | SBAP      | CAP            | TOTAL     | SBO                                   | SBAP      | CAP            | TOTAL     | SBO                                   | SBAP      | CAP            | TOTAL   |
| Michigan*          | 65,000                                | 420,000   | 0              | 485,000   | 71,300                                | 416,400   | 0              | 487,700   | 90,300                                | 537,000   | 0              | 627,300 |
| Minnesota*         | 70,000                                | 250,000   | 1,000          | 320,000   | 75,000                                | 225,000   | 1,000          | 300,000   | 75,000                                | 225,000   | 1,000          | 300,000 |
| Mississippi        | 150,000                               | 150,000   | 5,000          | 305,000   | 150,000                               | 150,000   | 5,000          | 305,000   | 179,500                               | 179,500   | 5,000          | 364,000 |
| Missouri           | 50,000                                | 345,000   | 10,000         | 395,000   | 52,000                                | 440,000   | 10,000         | 502,000   | 55,000                                | 458,000   | 10,000         | 523,000 |
| Montana            | 91,595                                | 38,405    | 1,000          | 131,000   | 91,595                                | 38,405    | 1,000          | 131,000   | 91,595                                | 38,405    | 1,000          | 131,000 |
| Nebraska           | N/R                                   | 105,000   | N/R            | 105,000   | 0                                     | 105,000   | 0              | 105,000   | N/R                                   | 105,000   | N/R            | 105,000 |
| Nevada*            | 77,103                                | 164,812   | 2,423          | 244,338   | 92,272                                | 168,812   | 2,600          | 263,684   | 79,645                                | 90,424    | 2,600          | 172,669 |
| New Hampshire      | 25,000                                | 75,000    |                | 100,000   | 25,000                                | 75,000    |                | 100,000   | 25,000                                | 75,000    |                | 100,000 |
| New Jersey*        | 80,000                                | 70,000    | 1,500          | 151,500   | 80,000                                | 70,000    | 1,500          | 151,500   | 80,000                                | 85,000    | 1,500          | 166,500 |
| New Mexico         | 10,000                                | 205,000   | <1,000         | 216,000   | 10,000                                | 205,000   | <1,000         | 216,000   | 10,000                                | 215,000   | 1,500          | 226,500 |
| New York*          | 1,170,000                             | 1,000,000 | N/A            | 2,170,000 | 1,170,000                             | 1,000,000 | 4,000          | 2,174,000 | Poss. 50% cut                         | 1,000,000 | N/R            | Unknown |
| North Carolina     | 307,000                               |           | 5,000          | 312,000   | 322,000                               |           | 3,000          | 325,000   | 325,000                               |           | 3,000          | 328,000 |
| North Dakota       | 30,000                                | 30,000    | 1,000          | 61,000    | 30,000                                | 30,000    | 1,000          | 61,000    | 30,000                                | 30,000    | 1,000          | 61,000  |
| Ohio*              | 135,000                               | 235,000   | No sep. budget | 370,000   | 208,000                               | 229,000   | No sep. budget | 437,000   | 204,000                               | 335,000   | No sep. budget | 539,000 |
| Oklahoma           | 10,000                                | 142,300   |                | 152,300   | 14,000                                | 147,992   |                | 162,000   | 14,300                                | 145,200   |                | 159,500 |
| Oregon             | 33,300                                | 90,800    | 2,200          | 126,300   | 35,000                                | 97,800    | 2,300          | 135,100   | 36,800                                | 102,600   | 2,500          | 141,900 |
| Pennsylvania*      | 35,000                                | 535,000   | 5,000          | 575,000   | 90,000                                | 560,000   | 5,000          | 655,000   | 95,000                                | 570,000   | 5,000          | 670,000 |
| Puerto Rico        | N/R                                   | 244,805   | N/R            | 244,805   | N/R                                   | 220,100   | N/R            | 220,100   | N/R                                   | 244,805   | N/R            | 244,805 |
| Rhode Island*      | 49,000                                | 110,000   | 0              | 159,000   | 49,000                                | 115,000   | 0              | 164,000   | 50,700                                | 119,000   | 0              | 169,000 |
| South Carolina     | 35,000                                | 85,000    | 1,500          | 121,500   | 40,000                                | 78,000    | 1,500          | 119,500   | 42,000                                | 83,500    | 1,500          | 127,000 |
| South Dakota       | 25,000                                | 10,000    | 5,000          | 40,000    | 25,000                                | 10,000    | 5,000          | 40,000    | 25,000                                | 10,000    | 5,000          | 40,000  |
| Tennessee*         | 900,000                               |           | 0              | 900,000   | 201,900                               |           | 0              | 201,900   | 201,900                               |           | 0              | 201,900 |
| Texas              | 1,296,849                             |           |                | 1,296,849 | 987,140                               |           |                | 987,140   | 913,751                               |           |                | 913,751 |
| Utah*              | 43,000                                | 203,000   | 2,000          | 248,000   | 54,000                                | 148,000   | 2,000          | 204,000   | 105,000                               | 130,000   | 2,000          | 237,000 |
| Vermont            | 0                                     | 60,000    | 0              | 60,000    | 0                                     | 60,000    | 5,000          | 65,000    | 0                                     | 60,000    | 5,000          | 65,000  |
| Virginia*          | 10,000                                | 175,000   | 5,000          | 190,000   | 10,000                                | 285,000   | 5,000          | 300,000   | 10,000                                | 250,000   | 5,000          | 265,000 |

N/A      Not applicable      N/R      No response



**TABLE D-4  
(Continued)**

| STATE OR TERRITORY | BUDGET FOR 1997 REPORTING PERIOD (\$) |         |        |         | BUDGET FOR 1998 REPORTING PERIOD (\$) |         |        |         | BUDGET FOR 1999 REPORTING PERIOD (\$) |         |        |         |
|--------------------|---------------------------------------|---------|--------|---------|---------------------------------------|---------|--------|---------|---------------------------------------|---------|--------|---------|
|                    | SBO                                   | SBAP    | CAP    | TOTAL   | SBO                                   | SBAP    | CAP    | TOTAL   | SBO                                   | SBAP    | CAP    | TOTAL   |
| Virgin Islands     | 55,000                                | 55,000  | 0      | 110,000 | 150,000                               | 150,000 | N/A    | 300,000 | 150,000                               | 150,000 | 5,000  | 305,000 |
| Washington         | 40,000                                | 200,000 | 5,000  | 245,000 | 40,000                                | 200,000 | 5,000  | 245,000 | 40,000                                | 200,000 | 5,000  | 245,000 |
| West Virginia*     | 60,000                                | 140,000 | 5,000  | 205,000 | 50,000                                | 140,000 | 5,000  | 195,000 | 30,000                                | 140,000 | 5,000  | 195,000 |
| Wisconsin          | 30,000                                | 117,000 | 3,000  | 150,000 | 30,000                                | 117,000 | 3,000  | 150,000 | N/R                                   | N/R     | N/R    | N/R     |
| Wyoming            | 25,000                                | 75,000  | 10,000 | 110,000 | 25,000                                | 75,000  | 10,000 | 110,000 | 25,000                                | 75,000  | 10,000 | 110,000 |

\*Notes, including explanations of significant changes (more than 10%) in funding levels among the 1997, 1998, and 1999 budget periods:

AR Small business assistance functions separated from Ombudsman and consolidated with Customer Service Division.

South Coast, CA 1997 budget for FY1997-98, 1998 budget for FY1998-99, 1999 budget for 1999-00.

CO Effective October 1998, the SBAP increased staff by one full time employee.

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

DC The Ombudsman position has been vacant since May 1998.

FL Reductions in state funding (via Title V fees) are due to departure of more senior staff and replacement with lower classifications. FL had 2 grants this year: Small Business Ombudsman/Small Business Assistance Program Conference and Printers' Training/Workshop "Printers Protecting the Environment."

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

IA In 1997, IA received an additional \$15,000 to conduct a needs assessment study of 112R-affected sources in Iowa. In 1998, IA received an additional \$50,000 to conduct a series of hands-on workshops on development of Risk Management Plans for 112R-affected sources in IA. FY 1999 projected budget reflects only the core program funding (an increase over 1998). Additional project funding may be added later. All budgets for fiscal year.

KS CAP has no budget -- travel allowance only. The technical assistance program, which began as an air-only program, was expanded in 1998 with money from waste, water, and remediation funding. In reality, the program has been multimedia for several years, but after this year the funding reflected the actual work accomplished. KS expects to continue the multimedia technical assistance approach and has full support of media bureaus within KDHE.

**TABLE D-4  
(Continued)**

|    |   |
|----|---|
| ME | Additional staff person added to SBTAP.   |
| MA | Level of funding has remained stable, except that program no longer has dedicated full time staff person to serve as liaison for SBAP function.   |
| MI | Funding is based on collected air permitting fees from the state's Title V program. In 1998, the fee structure was increased to begin supporting FY 1998-99. Both SBO and SBAP will experience an increase in funding of 26.6% and 28.9% respectively beginning 10/1/98.  |
| MN | MN had a P2 demonstration grant expire during 1998, resulting in a slight budget downfall.  |
| NV | 1997 budget information reflects actual expenditures, which included position vacancies; the SBAP technical assistance position was not filled until 1997, and the SBO position was vacant for 6 months in 1997 due to transfer of staff. The decrease in the 1999 SBAP budget reflects the expiration of the EPA Leadership Grant, which was subcontracted to the University of Nevada-Reno, SBDC.   |
| NJ | In 1999, the SBAP will receive the US EPA Region II grant for \$15,000 to set up an "800" hotline number, conduct 4 sector workshops, and develop/distribute appropriate materials.   |
| NY | Title V revenues were lower than expected.  |
| OH | SBAP: No new employees were hired in 1998; the 1999 projected budget reflects an allowance for one additional staff member. In addition, a significant part of 1998 supervisor's salary was charged to another program due to temporary transfer.<br>SBO: In 1998, SBO added a full time employee and expanded program outreach.  |
| PA | SBO was in office for only a portion of 1997, thereby explaining the low figure for 1997.   |
| RI | Increase due to hiring of a full time Principal Environmental Planner (4/97).   |
| TN | Multimedia organizational opportunities and structural realignment caused reduction in Title V fee collection.  |
| UT | SBO: The EPA Partnership for Compliance Grant has introduced substantial amount of contract funds that have not been obligated due to the length of the planning process. These funds will be obligated by September 1999.<br>SBAP: Program has reduced staff from 3 to 2.  |
| VA | The differences in funding from 1997 (FY98) to 1998 (FY99) are from a budget increase for salaries and benefits due to a realignment within the Office of Small Business Assistance, which allocated 2 additional FTEs to the office. The difference between 1998 and projected 1999 (FY00) takes into account the conversion of the EPA Internet position to FTE status within the SBAP after the end of the EPA Leadership Grant ends (3/31/99) and the depletion of grant funds. |
| WV | SBAP budget has fluctuated due to personnel changes. SBO budget has decreased because the SBO has semi-retired and is working approximately 20 hours per week.  |

**TABLE D-5  
STAFFING INFORMATION**

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

| STATE OR TERRITORY   | SBO FUNCTION (# FTEs) |             |                 | SBAP FUNCTION (# FTEs) |        |                                |                  |
|----------------------|-----------------------|-------------|-----------------|------------------------|--------|--------------------------------|------------------|
|                      | SBO                   | OTHER STAFF | TOTAL SBO STAFF | PAID                   | UNPAID | <sup>A</sup> RETIRED ENGINEERS | TOTAL SBAP STAFF |
| Alabama              | 3.00                  | 0           | 3.00            | 2.00*                  | 0      | 0                              | 2.00             |
| Alaska               | 1.00                  | 0.25        | 1.25            | 1.50                   | 0      | 0                              | 1.50             |
| Arizona              | 0.25                  |             | 0.25            | 2.25                   | 0      | 0                              | 2.25             |
| Maricopa County      | N/A                   | N/A         | N/A             | 2.75                   | 0      | 0                              | 2.75             |
| Arkansas             | 1.00                  | 0           | 1.00            | 3.50                   | 0      | 1.0                            | 3.50             |
| California           | 4.00                  | 2.00        | 6.00            | 20.00                  | 0      | 0                              | 20.00            |
| South Coast          | 4.00                  | 0.50        | 4.50            | 3.00                   | 0      | 0                              | 3.00             |
| Colorado             | 1.00                  | 0           | 1.00            | 3.00                   | 0      | 0                              | 3.00             |
| Connecticut          | 2.00                  | 0           | 2.00            | 0                      | 0      | 0                              | 0                |
| Delaware             | 1.00                  | 0.30        | 1.30            | 0                      | 0      | 0                              | 0                |
| District of Columbia | 0.10                  | 0           | 0.10            | 0.30                   | 0      | 0                              | 0.30             |
| Florida              | 0.50                  | 2.00        | 2.50            | *                      | 0      | 0                              | *                |
| Georgia              | 0.50                  | 0           | 0.50            | 2.50                   | 0      | 0.50                           | 2.50             |
| Hawaii               | 1.00                  | 1.00        | 2.00            | 1.75                   | 0      | 0                              | 1.75             |
| Idaho                | 1.00                  | 0           | 1.00            | 0*                     | 0      | 0                              | 0                |
| Illinois             | 1.00                  | 0           | 1.00            | 5.00                   | 0      | 0                              | 5.00             |
| Indiana              | 2.00                  | 0.25        | 2.25            | 12.00                  | 0      | 0                              | 12.00            |

**TABLE D-5  
(Continued)**

| STATE OR TERRITORY | SBO FUNCTION (# FTEs) |             |                 | SBAP FUNCTION (# FTEs) |        |                                |                  |
|--------------------|-----------------------|-------------|-----------------|------------------------|--------|--------------------------------|------------------|
|                    | SBO                   | OTHER STAFF | TOTAL SBO STAFF | PAID                   | UNPAID | <sup>A</sup> RETIRED ENGINEERS | TOTAL SBAP STAFF |
| Iowa               | 1.00                  | 0           | 1.00            | 5.00                   | 0      | 0                              | 5.00             |
| Kansas             | 1.00                  | 0.50        | 1.50            | 5.50                   | 0      | 0                              | 5.50             |
| Kentucky           | 1.50                  | 0           | 1.50            | 4.00                   | 0      | 0                              | 4.00             |
| Jefferson County   | 1.00                  | 0           | 1.00            | 2.00                   | 0      | 0                              | 2.00             |
| Louisiana          | 0.25                  | 0           | 0.25            | 10.00                  | 0      | 0                              | 10.00            |
| Maine              | 1.00                  | 0           | 1.00            | 2.00                   | 0      | 0                              | 2.00             |
| Maryland           | 0.05                  | 0           | 0.05            | 1.00                   | 0      | 0                              | 1.00             |
| Massachusetts      | N/A                   | N/A         | N/A             | 8.00                   | 0      | 0                              | 8.00             |
| Michigan           | 1.00                  | 0           | 1.00            | 7.50                   | 0      | 0                              | 7.50             |
| Minnesota          | 1.00                  | 0           | 1.00            | 3.00                   | 0      | 0                              | 3.00             |
| Mississippi        | 2.00                  | 0           | 2.00            | 5.50                   | 0      | 0                              | 5.50             |
| Missouri           | 1.00                  | 0           | 1.00            | 7.65                   | 0      | 0                              | 7.65             |
| Montana            | 1.00                  | 0.50        | 1.50            | 1.00                   | 0      | 0                              | 1.00             |
| Nebraska           | 1.00                  | 0           | 1.00            | 1.00                   | 0      | 0                              | 1.00             |
| Nevada             | 1.00                  | 0           | 1.00            | 1.00                   | 0      | 0                              | 1.00             |
| New Hampshire      | 0.25                  | 0           | 0.25            | 1.25                   | 0      | 0                              | 1.25             |
| New Jersey         | 1.00                  | 0.50        | 1.50            | 1.00                   | 0      | 0                              | 1.00             |
| New Mexico         | 0.50                  | 0           | 0.50            | 4.50                   | 0      | 0                              | 4.50             |
| New York           | 6.00                  | 2.00        | 8.00            | 7.00                   | 0      | 0                              | 7.00             |

**TABLE D-5  
(Continued)**

| STATE OR TERRITORY | SBO FUNCTION (# FTEs) |             |                 | SBAP FUNCTION (# FTEs) |        |                                |                  |
|--------------------|-----------------------|-------------|-----------------|------------------------|--------|--------------------------------|------------------|
|                    | SBO                   | OTHER STAFF | TOTAL SBO STAFF | PAID                   | UNPAID | <sup>A</sup> RETIRED ENGINEERS | TOTAL SBAP STAFF |
| North Carolina     | 1.50                  | 0           | 1.50            | 2.50                   | 0      | 0                              | 2.50             |
| North Dakota       | 0.50                  | 0           | 0.50            | 2.00                   | 0      | 0                              | 2.00             |
| Ohio               | 0.40                  | 1.60        | 2.00            | 4.00                   | 0      | 0                              | 4.00             |
| Oklahoma           | 0.10                  | 0           | 0.10            | 3.30                   | 0      | 0                              | 3.30             |
| Oregon             | 0.15                  | 0.20        | 0.35            | 1.00                   | 0      | 0                              | 1.00             |
| Pennsylvania       | 1.00                  | 1.50        | 2.50            | 3.50                   | 0      | 0                              | 3.50             |
| Puerto Rico        | 1.00                  | 0           | 1.00            | 2.00                   | 0      | 0                              | 2.00             |
| Rhode Island       | 1.00                  | 0           | 1.00            | 2.50                   | 0      | 0                              | 2.50             |
| South Carolina     | 1.00                  | 0           | 1.00            | 2.00                   | 0      | 0                              | 2.00             |
| South Dakota       | 0.50                  | 0           | 0.50            | 0.14                   | 0      | 0                              | 0.14             |
| Tennessee          | 2.00                  | 0           | 2.00            | 2.00                   | 0      | 0                              | 2.00             |
| Texas              | 14.50                 | 0           | 14.50           | 14.50                  | 70.00  | 0                              | 84.50            |
| Utah               | 0.50                  | 0           | 0.50            | 2.50                   | 0      | 0                              | 2.50             |
| Vermont            | 0                     | 0           | 0               | 1.10                   | 0      | 0                              | 1.10             |
| Virginia           | 0.10                  | 0.90        | 1.00            | 4.20                   | 0.50   | 0                              | 4.70             |
| Virgin Islands     | 1.00                  | 0           | 1.00            | 3.00                   | 0      | 0                              | 3.00             |
| Washington         | 0.50                  | 0           | 0.50            | 2.50                   | 0      | 0                              | 2.50             |
| West Virginia      | 0.50                  | 0.20        | 0.70            | 1.30                   | 0      | 0                              | 1.30             |
| Wisconsin          | 0.50                  | 2.00        | 2.50            | 2.50                   | 0      | 0                              | 2.50             |

**TABLE D-5  
(Continued)**

| STATE OR TERRITORY | SBO FUNCTION (# FTEs) |             |                 | SBAP FUNCTION (# FTEs) |        |                                |                  |
|--------------------|-----------------------|-------------|-----------------|------------------------|--------|--------------------------------|------------------|
|                    | SBO                   | OTHER STAFF | TOTAL SBO STAFF | PAID                   | UNPAID | <sup>A</sup> RETIRED ENGINEERS | TOTAL SBAP STAFF |
| Wyoming            | 0.50                  | 0           | 0.50            | 1.00                   | 0      | 0                              | 1.00             |

**\*Notes:**

**A** The number of retired engineers serving as paid or unpaid SBAP FTEs is included these columns. Use of retired engineers (paid or unpaid) is documented in the "Retired Engineers" column.

**AL** 10% of a staff of 20.

**FL** SBO/SBAP administrator functions are combined.

**ID** No dedicated FTEs, however, approximately 10 FTEs assist as needed.

**TABLE D-6  
CAP COMPOSITION**

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

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

**TABLE D-6  
(Continued)**

| STATE OR TERRITORY | NUMBER OF PEOPLE ON CAP    |                                 |                   |                      |       |
|--------------------|----------------------------|---------------------------------|-------------------|----------------------|-------|
|                    | SMALL<br>BUSINESS<br>OWNER | STATE<br>REGULATORY<br>EMPLOYEE | GENERAL<br>PUBLIC | NOT YET<br>APPOINTED | OTHER |
| Kansas             | 2                          | 1                               |                   | 4*                   |       |
| Kentucky           | 4                          | 1                               | 2                 | 2*                   | 2     |
| Jefferson County   | See KY                     |                                 |                   |                      |       |
| Louisiana          | 4                          | 2                               | 2                 |                      |       |
| Maine              | 4                          | 2                               | 2                 |                      | 8     |
| Maryland           | N/A                        |                                 |                   |                      |       |
| Massachusetts      | N/A*                       |                                 |                   |                      |       |
| Michigan           | 2                          | 1                               | 2                 | 2                    |       |
| Minnesota          | N/A*                       |                                 |                   |                      |       |
| Mississippi        | 2                          | 1                               | 2                 |                      | 2     |
| Missouri           | 2                          | 1                               | 2                 | 2                    |       |
| Montana            | 6                          | 1                               |                   |                      |       |
| Nebraska           | 4                          | 1                               | 2                 |                      | 1*    |
| Nevada             | 4                          | 1                               | 2                 |                      |       |
| New Hampshire      | 4                          | 1                               | 2                 |                      |       |
| New Jersey         | 4                          | 1                               | 2                 |                      |       |
| New Mexico         |                            | 1                               | 1                 | 5*                   |       |
| New York           | 6                          | 1                               | 2                 |                      |       |
| North Carolina     |                            |                                 |                   | 6*                   |       |



**TABLE D-6  
(Continued)**

| STATE OR TERRITORY | NUMBER OF PEOPLE ON CAP    |                                 |                   |                      |       |
|--------------------|----------------------------|---------------------------------|-------------------|----------------------|-------|
|                    | SMALL<br>BUSINESS<br>OWNER | STATE<br>REGULATORY<br>EMPLOYEE | GENERAL<br>PUBLIC | NOT YET<br>APPOINTED | OTHER |
| North Dakota       | 4                          | 1                               | 2                 |                      |       |
| Ohio               | 4                          | 1                               | 1                 | 1                    |       |
| Oklahoma           | 4                          |                                 | 2                 |                      | 1     |
| Oregon             | 2                          | 2                               | 3                 | 1                    |       |
| Pennsylvania       | 4                          | 2                               | 2                 | 1                    | 2     |
| Puerto Rico        | 2                          | 1                               | 3                 | 1                    |       |
| Rhode Island       |                            |                                 |                   | 7                    |       |
| South Carolina     | 4                          | 1                               | 2                 |                      |       |
| South Dakota       | 4                          | 1                               | 2                 |                      |       |
| Tennessee          |                            |                                 |                   | 7                    |       |
| Texas              | 3                          | 1                               | 1                 |                      | 2     |
| Utah               | 4                          | 1                               | 2                 |                      |       |
| Vermont            | 5                          |                                 | 1                 |                      | 1     |
| Virginia           | 4                          | 1                               | 2                 |                      |       |
| Virgin Islands     | N/A                        |                                 |                   |                      |       |
| Washington         | 2                          | 1                               | 1                 | 3                    |       |
| West Virginia      | 4                          | 1                               | 2                 |                      |       |
| Wisconsin          | 4                          | 2                               | 2                 |                      | 1     |
| Wyoming            | 4                          | 1                               | 2                 |                      | 2     |

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

**TABLE D-6  
(Continued)**

**\*Notes:**

AK Reappointments in progress for 2 CAP members.

South Coast, CA Membership of Local Government and Small Business Committee.

CO 1 small business owner is now a small business consultant.

IN 7 appointed, 1 resigned.

KS Currently awaiting new appointments.

KY Legislation was enacted by the 1998 General Assembly adding 2 small business representatives. They are to be appointed by the Executive Branch to the Panel increasing the total number of small business representatives to 6. Appointments pending.

MA Although CAP is not formally established, the Secretary of the Environment has met regularly with leaders of the business community (large and small) to discuss environmental progress and problems.

MN The CAP currently is dormant pending reassignment by a newly elected administration.

NE SBO as a non-voting member.

NM To be reappointed.

NC Inactive CAP. Getting timely appointments has been a problem-- NC will be getting an advisory body in 1999.

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

For SBO and SBAP functions, (R) denotes location is a regulatory agency; (N) denotes a non-regulatory agency or a non-enforcement division. CAPs are considered to be independent entities, located outside any agency, even though they may indicate that they receive administrative assistance from a regulatory or nonregulatory agency.

| STATE OR TERRITORY | BRIEF DESCRIPTION OF LOCATION   |  |   |
|--------------------|---|--|---|
|                    | SBO   | SBAP   | CAP   |
| Alabama            | AL Department of Environmental Management, Office of Education & Outreach (N)   | AL Department of Environmental Management, Air Division (R)  | Independent   |
| Alaska             | AK Department of Environmental Conservation, Statewide Public Service Division, Compliance Assistance Office (N)  | AK Department of Environmental Conservation, Statewide Public Service Division, Compliance Assistance Office (N)             | Private, uncompensated individuals from small business and the general public appointed by the legislature and the Governor. One member is an employee of the Department. |
| Arizona            | AZ Department of Environmental Quality, Compliance Assistance Section (N)   | AZ Department of Environmental Quality, Compliance Assistance Section (N)  | Located outside the Agency, but managed by AZ Department of Environmental Quality, Compliance Assistance Section  |
| Maricopa County    | N/R   | Environmental Services Department (R)  | N/R   |
| Arkansas           | Director's Office (R)   | Customer Service Division (R)  | Customer Service Division   |
| California         | Air Resources Board (ARB), Office of the Ombudsman (part of ARB, Office of the Chairman) (R)  | Throughout ARB, including the Office of the Ombudsman, Office of the Chairman, and local Air Pollution Control Districts (R) | ARB, Office of the Chairman   |
| South Coast        | The South Coast Air Quality Management District is a regional (Los Angeles, Orange, and portions of Riverside and San Bernardino Counties) single media (air only) regulatory agency. The ombudsman function and outreach function are co-located in the Public Advisor's Office of the District. (R) |  |   |
| Colorado           | CO Department of Public Health and Environment (CDPHE), Office of Customer Service (R)  | CDPHE, Air Pollution Control Division, Regulatory and Compliance Support Unit (R)  | Independent; located outside regulatory agencies. Members appointed as defined in Section 507.  |

N/A Not applicable

N/R No response

**TABLE D-7  
(Continued)**

| STATE OR TERRITORY   | BRIEF DESCRIPTION OF LOCATION  |  |   |
|----------------------|--|--|---|
|                      | SBO  | SBAP   | CAP   |
| Connecticut          | CT Department of Environmental Protection (R)  | CT Department of Environmental Protection (R)  | CT Department of Environmental Protection   |
| Delaware             | DNREC Secretary's Office (N)   | DNREC Secretary's Office (N)   | Independent   |
| District of Columbia | State regulatory agency (R)  | State regulatory agency (R)  | Business owners & private citizens  |
| Florida              | Department of Environmental Protection, Division of Air Resources and Management, Office of Air Programs Communications and Outreach (N) | Department of Environmental Protection, Division of Air Resources and Management, Office of Air Programs Communications and Outreach (N) | Independent   |
| Georgia              | EPD/Air Protection Branch/ Planning & Support Program (N)  | EPD/Air Protection Branch/Planning & Support Program (N)   | One CAP member is the program manager of the Compliance Permitting Program within the Air Protection Branch. The rest of the CAP is located outside of all agencies with each individual appointed as defined in Section 507. |
| Hawaii               | Department of Health, Director's Office (N)  | Department of Health, Clean Air Branch (R)   | Not yet established   |
| Idaho                | Division of Environmental Quality; Planning and Support Services; Prevention, Planning, and Outreach Bureau (N)                          | Division of Environmental Quality, Air and Hazardous Waste Division (R)  | Outside of all agencies, appointed as defined in Section 507  |
| Illinois             | IL Environmental Protection Agency (R)   | IL Department of Commerce and Community Affairs, Small Business Development Center (N)   | IL Department of Commerce and Community Affairs   |
| Indiana              | IN Department of Environmental Management, Office of Business Relations and Legislative Affairs (N)                                      | IN Department of Environmental Management, Office of Pollution Prevention and Technical Assistance (N)                                   | Independent   |

**TABLE D-7  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF LOCATION   |  |  |
|--------------------|---|--|--|
|                    | SBO   | SBAP   | CAP  |
| Iowa               | IA Department of Economic Development (N)   | IA Air Emissions Assistance Program (IAEAP), IA Waste Reduction Center (IWRC), University of Northern Iowa (N) | Pending legislators' appointment                                   |
| Kansas             | KS Department of Health and Environment, Planning & Prevention Section (N)  | Contracted* to University of KS, KS State University, and Wichita State University (N)                         | Independent  |
| Kentucky           | Office of the Commissioner, Department for Environmental Protection, Natural Resources and Environmental Protection Cabinet (R) | University of Kentucky* (N)  | Panel members appointed by Executive Order of the Governor         |
| Jefferson County   | Department of Planning and Environmental Management (N)   | Air Pollution Control District, Department of Planning and Environmental Management (R)                        | See KY   |
| Louisiana          | Department of Environmental Quality (R)   | Department of Environmental Quality (R)  | Independent  |
| Maine              | Department of Environmental Protection (R)  | Department of Environmental Protection (R)   | Outside Department as defined by Section 507                       |
| Maryland           | Department of the Environment, Environmental Permits Service Center (R)   | Department of the Environment, Environmental Permits Service Center (R)  | N/A  |
| Massachusetts      | Not established   | OTA (N) and DEP (R)*   | Not established  |
| Michigan           | MI Jobs Commission, Business Ombudsman's Office (N)   | Department of Environmental Quality, Environmental Assistance Division (R)                                     | N/A  |
| Minnesota          | Pollution Control Agency, Policy and Planning Division (N)  | Pollution Control Agency, Metro District (N)   | Independent  |
| Mississippi        | Department of Environmental Quality, Environmental Resource Center (R)  | Department of Environmental Quality, Environmental Resource Center (R)   | Department of Environmental Quality, Environmental Resource Center |

N/A Not applicable

N/R No response

**TABLE D-7  
(Continued)**

| STATE OR TERRITORY             | BRIEF DESCRIPTION OF LOCATION   |  |   |
|--------------------------------|---|--|---|
|                                | SBO   | SBAP   | CAP   |
| Missouri                       | Governor's Office (N)   | Department of Natural Resources, Division of Environmental Quality, Technical Assistance Program (R)       | Administratively associated with MDNR, supported by the Technical Assistance Program. |
| Montana                        | Department of Environmental Quality, Pollution Prevention Bureau (N)  | Department of Environmental Quality, Air and Waste Management Bureau and Pollution Prevention Bureau (N&R) | Department of Environmental Quality, Pollution Prevention Bureau                      |
| Nebraska                       | Public Advocate (N)   | Public Advocate (N)  | Public Advocate   |
| Nevada                         | Division of Environmental Protection, Office of the Administrator (R)   | Division of Environmental Protection, Office of the Administrator (R)                                      | Independent   |
| NV Bureau of Air Quality       | Division of Environmental Protection, Bureau of Air Quality (BAQ). The NDEP is the primary state regulatory agency for environmental issues, and the BAQ has oversight of air issues statewide with the exception of stationary sources located in Washoe and Clark Counties. (R)   |  |   |
| Washoe Cty Air Quality Program | Washoe County District Health Department, Air Quality Management Divisions; 401 Ryland Street, Suite #331; Reno, NV 89502-0027. This is the county regulatory agency for air quality issues. (R)  |  |   |
| Clark Cty Air Quality Program  | Clark County Health District, Air Pollution Control Division; 625 Shadow Lane; Las Vegas, NV 89106. This is the county regulatory agency for air quality issues. (R)  |  |   |
| BEP-UNR                        | NV Small Business Development Center, Business Environmental Program (BEP), University of Nevada Reno (UNR), c/o UNR College of Business Administration, 1664 N. Virginia Street, Reno, NV 89503. BEP was under contract with NDEP BAQ to provide outreach materials, workshops, and assistance regarding air quality issues (contract expired 8/98). (N) |  |   |
| New Hampshire                  | NH Department of Environmental Services, Office of the Commissioner (R)   | NH Department of Environmental Services, Air Resources Division (R)  | Independent with administrative support from SBAP and DES Air Resources Division      |
| New Jersey                     | Department of Commerce and Economic Growth Commission (N)   | Department of Environmental Protection (R)   | Department of Environmental Protection  |

**TABLE D-7  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF LOCATION  |  |  |
|--------------------|--|--|--|
|                    | SBO  | SBAP   | CAP  |
| New Mexico         | Environment Department (R)   | Environment Department, Air Quality Bureau, Control Strategy Section (R)   | Independent and located outside the agency   |
| New York           | NY State Empire State Development (N)  | NY State Environmental Facilities Corporation, Technical Advisory Services Division (N)  | Department of Environmental Conservation, Division of Air Resources, Bureau of Technical Services              |
| North Carolina     | Department of Environment and Natural Resources, Division of Pollution Prevention and Environmental Assistance (N) | Department of Environment and Natural Resources, Division of Pollution Prevention and Environmental Assistance (N)                         | Department of Environment and Natural Resources, Division of Pollution Prevention and Environmental Assistance |
| North Dakota       | Department of Health, Environmental Health Section Chief's Office (N)  | Department of Health, Environmental Health Section (air, water, waste) (R)   | Independent and located outside all agencies   |
| Ohio               | OH Air Quality Development Authority (N)   | OH Environmental Protection Agency, Division of Air Pollution Control (R)  | Independent  |
| Oklahoma           | Department of Environmental Quality, Executive Director's Office (N)   | Department of Environmental Quality, Customer Services Division (N)  | Department of Environmental Quality, Customer Services Division  |
| Oregon             | Department of Environmental Quality, Director's Office (R)   | Department of Environmental Quality, Air Quality Division (R)  | Outside agency and liaison to SBAP, SBO, small businesses  |
| Pennsylvania       | Department of Environmental Protection, Office of Pollution Prevention and Compliance Assistance (N)               | Contracted* (N)  | Independent  |
| Puerto Rico        | Commercial Development Administration (N)  | Environmental Quality Board, Air Quality Area (R)  | Not in full operation  |
| Rhode Island       | Department of Environmental Management, Office of the Director (N)   | Department of Environmental Management, Office of Technical and Customer Assistance; University of RI, Center for Pollution Prevention (N) | Will be located outside state agencies with individuals appointed as per Section 507                           |

**TABLE D-7  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF LOCATION  |   |  |
|--------------------|--|---|--|
|                    | SBO  | SBAP  | CAP  |
| South Carolina     | Department of Health and Environmental Control, Environmental Quality Control Administration (N) | Department of Health and Environmental Control, Environmental Quality Control Administration (N)    | Department of Health and Environmental Control, Environmental Quality Control Administration |
| South Dakota       | Supervised by DENR Secretary (R)   | DENR Air Program (R)  | Independent  |
| Tennessee          | Bureau of Environment, Department of Environment & Conservation (R)                              | Division of Community Assistance, Department of Environment & Conservation (N)                      | Not yet appointed  |
| Texas              | Natural Resource Conservation Commission, Small Business Assistance Program (N)                  | Natural Resource Conservation Commission, Small Business Assistance Program (N)                     | Natural Resource Conservation Commission, Small Business Assistance Program                  |
| Utah               | Department of Environmental Quality, Office of Planning and Public Affairs (R)                   | Department of Environmental Quality, Division of Air Quality, Operating Permits Section (R)         | Department of Environmental Quality, Division of Air Quality                                 |
| Vermont            | N/A  | ANR/Department of Environmental Conservation, Environmental Assistance Division (N)                 | ANR/Department of Environmental Conservation, Environmental Assistance Division              |
| Virginia           | Department of Environmental Quality, Air Programs Coordination (R)                               | Department of Environmental Quality, Division of Pollution Prevention and Compliance Assistance (N) | Appointed as per Section 507   |
| Virgin Islands     | Department of Planning and Natural Resources (R)   | Department of Planning and Natural Resources (R)  | Not yet named  |
| Washington         | Department of Ecology, Air Quality Program (R)   | Department of Ecology, Air Quality Program (R)  | Independent  |
| West Virginia      | Division of Environmental Protection (R)   | Division of Environmental Protection, Office of Air Quality (R)                                     | Located outside all agencies, appointed pursuant to Section 507                              |



**TABLE D-7  
(Continued)**

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

**\*Notes**

MA      OTA functions as the technical assistance arm of the state's SBAP. DEP provides regulatory compliance information through assistance centers. OTA and DEP cooperate on sector-based and outreach projects.

**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        | CONTRACTOR  | TERMS  |
|--------------|---|--|
| Kansas       | Mr. Frank M. Orzulak<br>University of Kansas<br>Division of Continuing Education<br>1515 St. Andrews Drive<br>Lawrence, KS 66047<br>785-864-9196<br>785-864-5074 fax  | 1998 budget: \$449,423 total for UK and KSU<br>Term of contract: July 1-July 1 annual renewal<br>Provides newsletter, resource center.                                     |
|              | Ms. Jean Waters<br>Kansas State University<br>Pollution Prevention Institute<br>133 Ward Hall<br>Manhattan, KS 66056<br>785-532-6501 and 800-578-8898<br>785-532-6952 fax   | 1998 budget: \$449,423 total for UK and KSU<br>Term of contract: July 1-July 1 annual renewal<br>Provides on sites, answers questions, develops manuals & other materials. |
| Kentucky     | Mr. Gregory C. Copley, Director<br>Kentucky Business Environmental Assistance Program<br>227 Gatton College of Business & Economics<br>University of Kentucky<br>Lexington, KY 40506-0034<br>606-257-1131<br>606-323-1907 fax | 1998 budget: \$262,500<br>Term of contract: Annual<br>Responsible for technical/compliance assistance. <sup>1</sup>  |
| Pennsylvania | Ms. Cecily Beall<br>Tetra Tech EM, Inc.<br>1800 JFK Boulevard, 6th Floor<br>Philadelphia, PA 19103<br>215-656-8709<br>215-972-0484 fax  | 1998 budget: \$560,000<br>Term of contract: 2 years<br>Responsible for technical assistance.   |

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**APPENDIX E**

**SBTCP ACTIVITIES AND SERVICES**

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**TABLE E-1**  
**SBTCP ASSISTANCE**  
**TOTAL STATES PROVIDING ASST. / TOTAL BUSINESSES REACHED**

| INDUSTRY (SIC)  | TOTAL STATES<br>PROVIDING ASST. | TOTAL BUSINESSES<br>REACHED |
|---|---------------------------------|-----------------------------|
| Cross Sector  | 24                              | 1105387                     |
| Other   | 29                              | 436145                      |
| Organizations/Associations (86)                       | 34                              | 159846                      |
| Auto/Body Maintenance, Repair, Refinishing (75)       | 44                              | 38454                       |
| Government (91, 95)                                   | 34                              | 22615                       |
| Printing/Graphic Arts (27)                            | 39                              | 20337                       |
| Dry Cleaners/Laundry Services (721)                   | 44                              | 15310                       |
| Recycling (509)                                       | 22                              | 13480                       |
| Agriculture/Farming/Crop Service (01, 07)             | 31                              | 8643                        |
| Paints & Painting/Coatings (172, 285)                 | 32                              | 8243                        |
| Construction/Contractor (15, 16, 17)                  | 31                              | 7105                        |
| Attorney/Consultant/Engineer (81, 87)                 | 35                              | 6563                        |
| Auto/Motor Vehicle Dealers & Equipment (55, 501)      | 29                              | 4586                        |
| Wastewater Treatment (495)                            | 22                              | 4400                        |
| Furniture Manufacture/Repair/Wood Finishing (25, 764) | 39                              | 3984                        |
| Manufacturing, Misc.                                  | 29                              | 3107                        |
| Metal Fabricating/Finishing (34)                      | 37                              | 3040                        |
| Private Citizen                                       | 25                              | 2999                        |
| Boilers (34, 50)                                      | 23                              | 2823                        |
| Plumbing/HVAC (171)                                   | 13                              | 2715                        |
| Gasoline Distribution (wholesale/retail) (517, 554)   | 27                              | 2435                        |
| Degreasers  | 25                              | 2164                        |
| Airports/Air Transportation (45)                      | 17                              | 2091                        |
| Asbestos/Remediation (17, 32)                         | 19                              | 1888                        |
| Restaurants (581)                                     | 13                              | 1627                        |
| Electroplating/Chrome Plating (347)                   | 31                              | 1603                        |
| Utilities (49)  | 25                              | 1408                        |
| Hospitals/Medical Health Services (80)                | 33                              | 1373                        |
| Schools (82)  | 27                              | 1352                        |
| Concrete/Aggregate (32)                               | 27                              | 1259                        |
| Chemicals/Products (28)                               | 33                              | 1249                        |
| Crushed Stone Products/Sand & Gravel (14)             | 28                              | 1235                        |
| Sawmills/Logging/Wood Products (24)                   | 30                              | 1133                        |
| Petroleum Products, Storage, Pipelines (29, 46)       | 28                              | 1101                        |
| Boat Manufacturing (373)                              | 20                              | 939                         |
| Incinerators  | 19                              | 901                         |
| Machine Shop (359)                                    | 15                              | 849                         |
| Machine/Equipment Manufacturing & Repair (35)         | 24                              | 829                         |
| Food/Beverage Products & Processing (20, 514)         | 25                              | 822                         |
| Aerospace (37)  | 16                              | 664                         |
| Mining (metal & coal) (10, 12)                        | 14                              | 652                         |
| Foundry/Smelter, Forging, Casting (33)                | 24                              | 579                         |
| Retail/Wholesale Trade (50, 51, 59)                   | 19                              | 551                         |
| Bakeries (546)  | 13                              | 543                         |
| Research & Testing Facilities/Laboratories (873)      | 19                              | 533                         |
| Repair, Misc. (76)                                    | 14                              | 489                         |
| Engines & Turbines (351)                              | 10                              | 370                         |
| Business Services (73)                                | 15                              | 364                         |
| Plastic Manufacturing/Products (308)                  | 23                              | 323                         |
| Waste/Waste Hauling (495)                             | 19                              | 317                         |
| Transportation Equipment (37)                         | 15                              | 298                         |
| Real Estate (65)                                      | 18                              | 270                         |
| Asphalt (295)   | 27                              | 199                         |
| Stone/Clay/Glass (32)                                 | 14                              | 198                         |
| Electronics/Electric Equipment/Repair (36, 762)       | 25                              | 165                         |
| Textiles & Apparel (22, 23)                           | 14                              | 157                         |
| Grains/Grain Elevators (011, 422)                     | 12                              | 154                         |
| Transportation Services (42, 44, 47)                  | 17                              | 151                         |
| Rubber Manufacturing/Products (30)                    | 15                              | 139                         |
| Landfills/Landfill Gas (495)                          | 20                              | 128                         |
| Paper Manufacturing/Products (26)                     | 18                              | 124                         |
| Analytical/Medical Instruments (38)                   | 15                              | 105                         |
| Veterinarians (074)                                   | 10                              | 104                         |
| Personal Services (72)                                | 14                              | 83                          |
| Hotels/Motels (70)                                    | 9                               | 72                          |
| Communications (48)                                   | 11                              | 57                          |
| Pharmaceuticals (283)                                 | 9                               | 55                          |
| Transit (passenger) (41)                              | 5                               | 33                          |
| Dairy/Feedlots/Livestock (02)                         | 14                              | 32                          |
| Recreation Services (79)                              | 11                              | 31                          |
| Cotton Gins (072)                                     | 4                               | 16                          |
| Leather/Fur (31, 237)                                 | 10                              | 16                          |

**TABLE E-2**  
**SBTCP ASSISTANCE**  
**TOTAL STATES PROVIDING ASST. / TOTAL BUSINESSES REACHED**

| INDUSTRY (SIC)  | TOTAL STATES<br>PROVIDING ASST. | TOTAL BUSINESSES<br>REACHED |
|---|---------------------------------|-----------------------------|
| Auto/Body Maintenance, Repair, Refinishing (75)       | 44                              | 38454                       |
| Dry Cleaners/Laundry Services (721)                   | 44                              | 15310                       |
| Furniture Manufacture/Repair/Wood Finishing (25, 764) | 39                              | 3984                        |
| Printing/Graphic Arts (27)                            | 39                              | 20337                       |
| Metal Fabricating/Finishing (34)                      | 37                              | 3040                        |
| Attorney/Consultant/Engineer (81, 87)                 | 35                              | 6563                        |
| Government (91, 95)                                   | 34                              | 22615                       |
| Organizations/Associations (86)                       | 34                              | 159846                      |
| Chemicals/Products (28)                               | 33                              | 1249                        |
| Hospitals/Medical Health Services (80)                | 33                              | 1373                        |
| Paints & Painting/Coatings (172, 285)                 | 32                              | 8243                        |
| Agriculture/Farming/Crop Service (01, 07)             | 31                              | 8643                        |
| Construction/Contractor (15, 16, 17)                  | 31                              | 7105                        |
| Electroplating/Chrome Plating (347)                   | 31                              | 1603                        |
| Sawmills/Logging/Wood Products (24)                   | 30                              | 1133                        |
| Auto/Motor Vehicle Dealers & Equipment (55, 501)      | 29                              | 4586                        |
| Manufacturing, Misc.                                  | 29                              | 3107                        |
| Other   | 29                              | 436145                      |
| Petroleum Products, Storage, Pipelines (29, 46)       | 28                              | 1101                        |
| Asphalt (295)   | 27                              | 199                         |
| Concrete/Aggregate (32)                               | 27                              | 1259                        |
| Gasoline Distribution (wholesale/retail) (517, 554)   | 27                              | 2435                        |
| Schools (82)  | 27                              | 1352                        |
| Crushed Stone Products/Sand & Gravel (14)             | 26                              | 1235                        |
| Degreasers  | 25                              | 2164                        |
| Electronics/Electric Equipment/Repair (36, 762)       | 25                              | 165                         |
| Food/Beverage Products & Processing (20, 514)         | 25                              | 822                         |
| Private Citizen                                       | 25                              | 2999                        |
| Utilities (49)  | 25                              | 1408                        |
| Foundry/Smelter, Forging, Casting (33)                | 24                              | 579                         |
| Machine/Equipment Manufacturing & Repair (35)         | 24                              | 829                         |
| Cross Sector  | 24                              | 1105387                     |
| Boilers (34, 50)                                      | 23                              | 2823                        |
| Plastic Manufacturing/Products (308)                  | 23                              | 323                         |
| Recycling (509)                                       | 22                              | 13480                       |
| Wastewater Treatment (495)                            | 22                              | 4400                        |
| Boat Manufacturing (373)                              | 20                              | 939                         |
| Landfills/Landfill Gas (495)                          | 20                              | 128                         |
| Asbestos/Remediation (17, 32)                         | 19                              | 1988                        |
| Incinerators  | 19                              | 901                         |
| Research & Testing Facilities/Laboratories (873)      | 19                              | 533                         |
| Retail/Wholesale Trade (50, 51, 59)                   | 19                              | 551                         |
| Waste/Waste Hauling (495)                             | 19                              | 317                         |
| Paper Manufacturing/Products (26)                     | 18                              | 124                         |
| Real Estate (65)                                      | 18                              | 270                         |
| Airports/Air Transportation (45)                      | 17                              | 2091                        |
| Transportation Services (42, 44, 47)                  | 17                              | 151                         |
| Aerospace (37)  | 16                              | 664                         |
| Analytical/Medical Instruments (38)                   | 15                              | 105                         |
| Business Services (73)                                | 15                              | 364                         |
| Machine Shop (359)                                    | 15                              | 849                         |
| Rubber Manufacturing/Products (30)                    | 15                              | 139                         |
| Transportation Equipment (37)                         | 15                              | 298                         |
| Dairy/Feedlots/Livestock (02)                         | 14                              | 32                          |
| Mining (metal & coal) (10, 12)                        | 14                              | 652                         |
| Personal Services (72)                                | 14                              | 83                          |
| Repair, Misc. (76)                                    | 14                              | 489                         |
| Stone/Clay/Glass (32)                                 | 14                              | 198                         |
| Textiles & Apparel (22, 23)                           | 14                              | 157                         |
| Bakeries (546)  | 13                              | 543                         |
| Plumbing/HVAC (171)                                   | 13                              | 2715                        |
| Restaurants (581)                                     | 13                              | 1627                        |
| Grains/Grain Elevators (011, 422)                     | 12                              | 154                         |
| Communications (48)                                   | 11                              | 57                          |
| Recreation Services (79)                              | 11                              | 31                          |
| Engines & Turbines (351)                              | 10                              | 370                         |
| Leather/Fur (31, 237)                                 | 10                              | 16                          |
| Veterinarians (074)                                   | 10                              | 104                         |
| Hotels/Motels (70)                                    | 9                               | 72                          |
| Pharmaceuticals (283)                                 | 9                               | 55                          |
| Transit (passenger) (41)                              | 5                               | 33                          |
| Cotton Gins (072)                                     | 4                               | 16                          |

**TABLE E-3  
HIGH PRIORITY INDUSTRY SECTORS TARGETED FOR ASSISTANCE**

| <b>PROGRAM</b>       | <b>HIGH PRIORITY INDUSTRY SECTORS TARGETED FOR ASSISTANCE</b>   |
|----------------------|---|
| Alabama              | N/R   |
| Alaska               | The Compliance Assistance Office (which includes the SBAP) responds to public requests for assistance. Our clients, in part, prioritize our work. Sectors that CAO is focusing on in FY99 include <b>auto service, contractors, and oil field service.</b>    |
| Arizona              | N/R   |
| Maricopa Cty         | <b>Printers, auto body, dry cleaners, construction.</b>   |
| Arkansas             | <b>Foundry and die casting</b> compliance assistance program conducted jointly with EPA Region 6.   |
| California           | <b>Dry cleaners.</b>  |
| South Coast          | Clean Air Ambassador Program involved a cross section of all types of industries. Focused on <b>automotive repair and other high solvent users.</b>   |
| Colorado             | <b>Restaurants, hospitals, chrome platers.</b>  |
| Connecticut          | <b>Automotive.</b>  |
| Delaware             | <b>Dry cleaners.</b>  |
| District of Columbia | <b>Dry cleaners, utility boilers.</b>   |
| Florida              | <b>Printers</b> (developed workshops and workbook), <b>dry cleaners</b> (distributed compliance calendars for 1999).  |
| Georgia              | <b>Dry cleaners, printers, automotive repair shops, manufacturers of consumer products.</b>   |
| Hawaii               | <b>Dry cleaners</b> (trade association/business advocacy outreach).   |
| Idaho                | <b>Auto body shops, printers, dry cleaners.</b>   |
| Illinois             | <b>Dry cleaners, printers, metal finishers, medical waste incinerators, degreasers.</b>   |
| Indiana              | <b>Perc dry cleaners, vehicle maintenance shops, collision repair/auto refinishers, fiberglass reinforced product manufacturers</b> (due to change in calculating emission factors), <b>printers, hospitals, schools, Toxics Release Inventory reporters.</b> |

**TABLE E-3  
(Continued)**

| <b>PROGRAM</b> | <b>HIGH PRIORITY INDUSTRY SECTORS TARGETED FOR ASSISTANCE</b>   |
|----------------|---|
| Iowa           | <p>SBO - All manufacturers including foundries, furniture manufacturers, lumber mills, metal finishers, newspapers, printers, textile mills, and wood finishers.</p> <p>SBAP - Agri-businesses (mass mailing in connection with development of the Handbook of Environmental Regulations for Small Businesses - SBREFA grant). Main focus on 1997 state permitting amnesty list of 167 various types of businesses.</p>   |
| Kansas         | Underground storage tanks; non-point source pollution; anhydrous ammonia, propane and chlorine users affected by 112(r); dry cleaners; feedlot dust; and environmental management systems.  |
| Kentucky       | Wood finishers, printers, and metal fabricators. All industry sectors that will be required to submit risk management plans were targeted for assistance through special mailings and a series of seminars held November 1998.  |
| Jefferson Cty  | N/R   |
| Louisiana      | Dry cleaners, wood finishers, architectural coating manufacturers.  |
| Maine          | Dry cleaners, facilities subject to CAA Section 112(r) (e.g., propane, chlorine, ammonia, etc.).  |
| Maryland       | N/R   |
| Massachusetts  | <p>Solvent users were contacted and offered free software developed by the office to assist in calculating VOC emissions.</p> <p>Auto body shops were offered a series of workshops and a plain-language guide to regulations containing an agreement between the enforcement agencies (brokered by OTA) on what an inspector would consider a "good faith" effort to comply with the rules or employ pollution prevention to be responsible.</p> <p>Schools continued to be offered special assistance with chemical use and indoor air issues.</p> <p>Departments of Public Works were offered a series of workshops on compliance and pollution prevention.</p> <p>Dry cleaners were reached through a cooperative project with trade associations. Dry cleaners were included in a self-certification system, the Environmental Results Program.</p> <p>Printers also were included in the Environmental Results Program.</p> |
| Michigan       | Surface coaters.  |
| Minnesota      | Non-metallic mineral processors at taconite facilities; vendors, suppliers, and contractors who supply or use aqueous-based coatings within the wood finishing industry; vapor degreasers.  |
| Mississippi    | Sources affected by 112(r).   |

**TABLE E-3  
(Continued)**

| <b>PROGRAM</b> | <b>HIGH PRIORITY INDUSTRY SECTORS TARGETED FOR ASSISTANCE</b>   |
|----------------|---|
| Missouri       | <b>Printers</b> (P2 compliance guides were compiled for screen, lithographic, and flexographic printers.)   |
| Montana        | <b>Dry cleaners, automobile repair, automobile refinishers.</b>   |
| Nebraska       | None.   |
| Nevada         | Industries having sand and gravel operations or processes that generate fugitive dust, including <b>road construction, gravel pits, mines, and state departments of transportation.</b>   |
| New Hampshire  | <b>Automotive repair and refinishing, wood furniture refinishing.</b>   |
| New Jersey     | <b>Dry cleaners, printers, schools, chemical manufacturers.</b>   |
| New Mexico     | <b>Asphalt plants, rock crushers, dry cleaners, automotive repair, printers, concrete batch plants.</b>   |
| New York       | <b>Dry cleaners, halogenated solvent degreasers, boilers/combustion sources, sources with PTEs above major thresholds that need to cap actual emissions under Title V limits.</b>   |
| North Carolina | <b>Metal electroplaters, printers.</b>  |
| North Dakota   | <b>Anhydrous ammonia dealers.</b>   |
| Ohio           | <b>Dry cleaners.</b> (Five region-specific mass mailings were sent to dry cleaners that had not yet filed for permit applications. The mailings listed the SBAP as a source of help. This resulted in the SBAP visiting 57 dry cleaners to help them with permit applications.) |
| Oklahoma       | <b>Wood furniture manufacturers, metal recyclers/reclaimers, consumer products manufacturers, printers.</b>   |
| Oregon         | <b>Automotive repair, autobody repair, chrome electroplaters, printers.</b>   |
| Pennsylvania   | None.   |
| Puerto Rico    | <b>Dry cleaners - perc.</b>   |
| Rhode Island   | <b>Auto body, screen printers.</b>  |
| South Carolina | <b>Printers, consumer product manufacturers.</b>  |
| South Dakota   | N/R   |
| Tennessee      | <b>Companies potentially affected by CAA 112(r) regulations.</b>  |
| Texas          | <b>Dry cleaners, auto body and auto service facilities, metal finishers, RCRA waste recordkeeping, printers, chemical coaters.</b>  |

N/A Not applicable    N/R No response



**TABLE E-3  
(Continued)**

| <b>PROGRAM</b> | <b>HIGH PRIORITY INDUSTRY SECTORS TARGETED FOR ASSISTANCE</b>   |
|----------------|---|
| Utah           | <b>Wood furniture manufacturers.</b>  |
| Vermont        | <b>Vehicle service.</b>   |
| Virginia       | Targeted assistance this year was through the utilization of downlink telecasts for <b>consumer products manufacturers and screen printers</b> . Also targeted for outreach in 1999, but with development beginning this reporting year, are <b>sources affected by 112(r), specifically propane dealers and users, and cold storage ammonia warehouses.</b>                  |
| Virgin Islands | <b>Auto body and repair shops.</b>  |
| Washington     | Department of Ecology: <b>Hospitals.</b><br><br>OAPCA: <b>Asbestos, printers, spray coating operations, gas stations.</b><br><br>NWAPA: <b>Agriculture burning.</b><br><br>SCAPCA: <b>Surface coating operations, screen and lithographic printers.</b>   |
| West Virginia  | Due to personnel changes in WV OAQ's SBAP and SBO programs in 1998, an emphasis was placed on training. Therefore, outreach efforts were limited, and resources were concentrated on responding to requests for technical assistance.   |
| Wisconsin      | Efforts targeted around current and emerging environmental regulations and their enforcement efforts rather than singling out an industry sector. The latest two initiatives, <b>minor source permits and 112(r)</b> , have hit a wide range of businesses from several sectors.  |
| Wyoming        | <b>Agriculture production and agriculture chemical applicators, auto service and auto body repair facilities, contractors, dry cleaners, fiberglass and molded plastic manufacturing operations, medical facilities and laboratories with medical waste incinerators, printers, wood furniture manufacturers, wood finishing operations, and oil field service companies.</b> |

**TABLE E-4**  
**SBTCP ASSISTANCE**  
**TOTAL BUSINESSES REACHED\***

| PROGRAM              | TOTAL BUSINESSES<br>REACHED |
|----------------------|-----------------------------|
| Alabama              | 1374                        |
| Alaska               | 462                         |
| Arizona              | 27338                       |
| Maricopa County, AZ  | 8583                        |
| Arkansas             | 1556                        |
| California           | 11416                       |
| South Coast, CA      | 2894                        |
| Colorado             | NA                          |
| Connecticut          | 5439                        |
| Delaware             | 221                         |
| District of Columbia | NA                          |
| Florida              | 2575                        |
| Georgia              | 44821                       |
| Hawaii               | 175                         |
| Idaho                | 994                         |
| Illinois             | 8895                        |
| Indiana              | 10596                       |
| Iowa                 | 4227                        |
| Kansas               | 13675                       |
| Kentucky             | 325817                      |
| Jefferson County, KY | 571                         |
| Louisiana            | 17554                       |
| Maine                | 969                         |
| Maryland             | 181                         |
| Massachusetts        | 12026                       |
| Michigan             | 13978                       |
| Minnesota            | 19453                       |
| Mississippi          | 15447                       |
| Missouri             | 11237                       |
| Montana              | 1302                        |
| Nebraska             | 5984                        |
| Nevada               | 4171                        |
| New Hampshire        | 8924                        |
| New Jersey           | 33184                       |
| New Mexico           | 1615                        |
| New York             | 20635                       |
| North Carolina       | 41840                       |
| North Dakota         | NA                          |
| Ohio                 | 7405                        |
| Oklahoma             | 2521                        |
| Oregon               | 815                         |
| Pennsylvania         | 1185                        |
| Puerto Rico          | 108                         |
| Rhode Island         | 2343                        |
| South Carolina       | 41639                       |
| South Dakota         | NA                          |
| Tennessee            | 4340                        |
| Texas                | 40694                       |
| Utah                 | 3228                        |
| Vermont              | 2066                        |
| Virginia             | 144576                      |
| Virgin Islands       | 18849                       |
| Washington           | 22445                       |
| West Virginia        | 113                         |
| Wisconsin            | 19908                       |
| Wyoming              | 10082                       |
| <b>TOTAL</b>         | <b>1002446</b>              |

NOTE\* "Total businesses reached" as reported by the states is used as the "official" count for this report.  
Seven programs did not keep data by industry sector, and only "total businesses reached" was given. (AR; ID; Jefferson Cty., KY; MN; NH; NC; WI)  
Four states kept information on the types of services they offered or the industry sectors they assisted, but did not compile data. (CO, DC, ND, SD)  
OH chose not to count over 950,000 publications in their "total businesses reached" tally. The publications are reflected in the sector totals,  
but not in the overall number of businesses reached for this program.

**TABLE E-5**  
**SBTCP ASSISTANCE**  
**TOTAL BUSINESSES REACHED BY ASSISTANCE TYPE**

Many states tried not to double count total businesses reached when collecting their data. Therefore, data cannot be summed across to find total businesses reached for each state.

4 programs indicated the types of assistance they provided, but did not include data.

| PROGRAM              | HOTLINE | ON-SITE VISITS | SEMINARS/<br>WORKSHOPS | PUBLICATIONS | HOME PAGE | TELECONFERENCE | MAILINGS | OTHER |
|----------------------|---------|----------------|------------------------|--------------|-----------|----------------|----------|-------|
| Alabama              | 1234    | 0              | 140                    | 0            | 0         | 0              | 0        | 0     |
| Alaska               | 363     | 5              | 0                      | 0            | 0         | 0              | 61       | 33    |
| Arizona              | 1277    | 21             | 40                     | 26000        | 0         | 0              | 0        | 0     |
| Maricopa County, AZ  | 0       | 124            | 232                    | 6850         | x         | 0              | 609      | 768   |
| Arkansas             | 520     | 156            | 60                     | 0            | 220       | 0              | 600      | 0     |
| California           | 7741    | 2011           | 116                    | 385          | 0         | 5              | 703      | 463   |
| South Coast, CA      | 1981    | 148            | 8                      | 292          | 0         | 0              | 0        | 465   |
| Colorado             | x       | x              | x                      | x            | 0         | 0              | x        | 0     |
| Connecticut          | 230     | 55             | 1550                   | 855          | 0         | 0              | 2329     | 420   |
| Delaware             | 0       | 71             | 150                    | 0            | 0         | 0              | 0        | 0     |
| District of Columbia | x       | 0              | 0                      | 0            | 0         | 0              | 0        | 0     |
| Florida              | 245     | 0              | 0                      | 2330         | 0         | 0              | 2330     | 0     |
| Georgia              | 550     | 30             | 829                    | 25768        | 0         | 0              | 14043    | 3601  |
| Hawaii               | 27      | 5              | 34                     | 2            | 0         | 12             | 95       | 0     |
| Idaho                | 990     | 2              | 2                      | 0            | 0         | 0              | 0        | 0     |
| Illinois             | 446     | 0              | 1511                   | 18           | 1962      | 41             | 4517     | 400   |
| Indiana              | 2766    | 155            | 764                    | 6739         | 1544      | 67             | 5361     | 0     |
| Iowa                 | 0       | 114            | 608                    | 400          | 0         | 0              | 2300     | 805   |
| Kansas               | 453     | 19             | 1873                   | 3673         | 3188      | 21             | 251      | 8500  |
| Kentucky             | 737     | 72             | 155                    | 323000       | 800       | 4              | 869      | 180   |
| Jefferson County, KY | 240     | 40             | 0                      | 200          | 0         | 10             | 0        | 77    |
| Louisiana            | 60      | 1023           | 0                      | 23           | 12608     | 0              | 2572     | 1286  |
| Maine                | 114     | 60             | 571                    | 1            | 0         | 0              | 316      | 0     |
| Maryland             | x       | 18             | 0                      | 0            | 0         | 0              | 0        | 163   |
| Massachusetts        | 2500    | 94             | 1753                   | 2200         | 1200      | 0              | 8090     | 40    |
| Michigan             | 1582    | 64             | 2315                   | 7790         | 1475      | 0              | 0        | 0     |
| Minnesota            | 1797    | 126            | 222                    | 8869         | x         | 0              | 8418     | 21    |
| Mississippi          | 5000    | 2768           | 450                    | 450          | 0         | 0              | 3208     | 5000  |
| Missouri             | 2966    | 55             | 1549                   | 6613         | 24        | 30             | 0        | 0     |
| Montana              | 389     | 93             | 120                    | 450          | 0         | 0              | 1079     | 16    |
| Nebraska             | 208     | 43             | 3401                   | 0            | 0         | 12             | 374      | 1946  |
| Nevada               | 873     | 490            | 1091                   | 893          | 10        | 81             | 240      | 493   |
| New Hampshire        | 747     | 32             | 320                    | 6000         | 0         | 75             | 1750     | 0     |
| New Jersey           | 935     | 2              | 1682                   | 1000         | 1218      | 50             | 28199    | 95    |
| New Mexico           | 17      | 0              | 256                    | 1245         | 0         | 0              | 97       | 0     |
| New York             | 2026    | 17             | 1221                   | 9000         | 687       | 20             | 29350    | 680   |
| North Carolina       | 1500    | 40             | 1300                   | 20000        | 2000      | x              | 12000    | 5000  |
| North Dakota         | 0       | x              | x                      | x            | 0         | x              | x        | 0     |
| Ohio                 | 1314    | 148            | 532                    | 997104       | 882       | 0              | 4038     | 199   |
| Oklahoma             | 884     | 30             | 32                     | 160          | x         | 22             | 1580     | 0     |

### TOTAL BUSINESSES REACHED BY ASSISTANCE TYPE

4 programs indicated the types of assistance they provided, but did not include data.

[illegible]

**TABLE E-6**  
**NEW DOCUMENTS PREPARED AND DISTRIBUTED BY SBTCPs IN 1998**

| STATE OR TERRITORY   | 1998 SBTCP DOCUMENTS  |
|----------------------|---|
| Alabama              | <ul style="list-style-type: none"> <li>General Inspection Fact Sheet</li> </ul>   |
| Alaska               | <ul style="list-style-type: none"> <li>UIC Fact Sheet</li> <li>Habits of Highly Effective Alaskan Businesses</li> <li>Alaska Materials Exchange</li> </ul>  |
| Arizona              | N/R   |
| Maricopa Cty         | <ul style="list-style-type: none"> <li>Assistance Request Form - faxed to business &amp; they fax back with pertinent information and what they need</li> <li>Compliance Incentive Package - documents explaining the program</li> <li>Auto body start up documents - cover sheet, rule (portion), and sample letter; used with CIP and thereafter</li> <li>VOC Calculation Help Sheet</li> <li>Sample permit applications - industry-specific samples for 5 industries or processes</li> </ul> |
| Arkansas             | <ul style="list-style-type: none"> <li>The Clean Team - brochure on Mentor-Protégé Program</li> <li>Financing the Clean Team - describes the revolving loan fund established by the Department</li> </ul>   |
| California           | <ul style="list-style-type: none"> <li>The Green Award: Recognizing Exceptional Environmental Solutions - awards program brochure (Santa Barbara County)</li> <li>Business Environmental Resource Center - brochure (Sacramento County)</li> <li>1998 Pollution Prevention Week - brochure (Sacramento County)</li> <li>Business Assistance Program: A Partnership for Clean Air - brochure (Bay Area Air Quality Management District)</li> </ul>   |
| South Coast          | <ul style="list-style-type: none"> <li>Business Assistance Resource Guides</li> <li>Building and Safety Plan - check questionnaire</li> <li>AQMD Business Assistance Cards - now publicly available at city permitting centers</li> </ul>   |
| Colorado             | N/R   |
| Connecticut          | N/R   |
| Delaware             | <ul style="list-style-type: none"> <li>Several dry cleaning documents</li> </ul>  |
| District of Columbia | N/R   |
| Florida              | <ul style="list-style-type: none"> <li>Crematory Fact Sheet</li> <li>1999 Dry Cleaners' Calendar</li> <li>Developed workbook for printers' training workshops to be held in 1999</li> </ul>   |

**TABLE E-6  
(Continued)**

| STATE OR<br>TERRITORY | 1998 SBTCP DOCUMENTS  |
|-----------------------|---|
| Georgia               | <ul style="list-style-type: none"> <li>• Surface Coaters' Permit Guide</li> <li>• 1999 Dry Cleaner Compliance Calendar</li> <li>• SBAP Brochure</li> <li>• 112(r) Risk Management Brochure</li> <li>• Lithographic Printers' Permit Guide</li> <li>• National Emission Standards for the Printing and Publishing Industry: Summary</li> </ul>   |
| Hawaii                | <ul style="list-style-type: none"> <li>• CAO Fact Sheet</li> <li>• Dry Cleaners' Focus Group Records and Frequently Asked Questions</li> </ul>  |
| Idaho                 | None  |
| Illinois              | <ul style="list-style-type: none"> <li>• Small Business Environmental Assistance Bulletin - Summer, Autumn 1998</li> <li>• Greater Chicago Directory of Environmental Resources</li> <li>• Clean Fuel Fleets Program - fact sheet</li> <li>• Guidelines for Determining Businesses Potential to Emit Air Pollution - fact sheet</li> <li>• Revisions to the IL Cold Cleaning Regulations - fact sheet</li> <li>• Revisions to the IL Wood Furniture Coatings Regulations - fact sheet</li> <li>• How Do I Manage My Hazardous Waste? - fact sheet</li> <li>• Do I Have Special Waste? - fact sheet</li> <li>• Storm Water - Keep it Clean - fact sheet</li> <li>• Watch Your Perc - fact sheet</li> <li>• Good Cents Tips for PERC Dry Cleaners - poster</li> </ul> |

**TABLE E-6  
(Continued)**

| STATE OR<br>TERRITORY | 1998 SBTCP DOCUMENTS   |
|-----------------------|--|
| Indiana               | <p>Dry Cleaning</p> <ul style="list-style-type: none"> <li>• 5-Star Environmental Recognition Program Application</li> <li>• Solvent Mileage - poster</li> <li>• Brochure for customers</li> <li>• Map of 5-Star program participants</li> <li>• Compliance Manual - updated</li> </ul> <p>Vehicle Maintenance</p> <ul style="list-style-type: none"> <li>• Compliance Manual for Indiana's Vehicle Maintenance Shops</li> <li>• 5-Star Environmental Recognition Program application</li> <li>• Brochures - workshops, compliance manual, 5-Star environmental recognition program, availability of on-site assistance</li> </ul> <p>HVAC/Plumbing</p> <ul style="list-style-type: none"> <li>• Mercury Thermostat Reduction &amp; Recycling Program - 2 brochures explaining the program</li> <li>• Mercury Thermostat Reduction &amp; Recycling Program - brochure for HVAC customers explaining the program and encouraging customers to act cooperatively</li> </ul> <p>Fiberglass Reinforced Products</p> <ul style="list-style-type: none"> <li>• Environmental Information for Fiber Reinforced Product Manufacturers - brochure</li> </ul> <p>Wood Furniture</p> <ul style="list-style-type: none"> <li>• Certified Product Data Sheet Question and Answer Document - brochure</li> <li>• Wood Furniture NESHAP Question and Answer Document - brochure</li> <li>• What a Typical NESHAP Inspection Will Involve - brochure</li> </ul> <p>Collision Repair/Auto Refinishing</p> <ul style="list-style-type: none"> <li>• Collision Repair/Auto Refinishing manual - draft chapters developed and routed for review and comment</li> <li>• Brochure announcing the availability of on-site assistance</li> </ul> <p>Toxics Release Inventory</p> <ul style="list-style-type: none"> <li>• Annual Report - this is the first annual report to be done in this topic in Indiana</li> </ul> <p>Mercury Brochure</p> <ul style="list-style-type: none"> <li>• Mercury Awareness Program - brochure identifying mercury-containing products commonly found in homes and businesses</li> </ul> |

**TABLE E-6  
(Continued)**

| STATE OR<br>TERRITORY | 1998 SBTCP DOCUMENTS   |
|-----------------------|--|
| Iowa                  | <p><b>SBO</b></p> <ul style="list-style-type: none"> <li>• Agri-business survey - all agricultural sectors covered</li> <li>• Asbestos information survey - asbestos contractors and building owners</li> <li>• Cost-effectiveness survey - cross sectional</li> <li>• Benchmarking study to compare Iowa's air quality stringency with that of other states - cross sectional</li> </ul> <p><b>SBAP</b></p> <ul style="list-style-type: none"> <li>• 112(r) needs assessment study of affected sources in Iowa</li> <li>• Resource Guide 1998 - finalized electronic version of guide covering all SBO/SBAP programs nationwide</li> <li>• Program for Enhanced Environmental Recordkeeping (PEER) - developing a computerized program, primarily for the manufacturing sector; will be expanded later</li> </ul>   |
| Kansas                | <p><b>SBO</b></p> <ul style="list-style-type: none"> <li>• Policies, Procedures, and Guidance Documents Update for 1997</li> <li>• Policies, Procedures, and Guidance Documents Update for 1998 (submitted early 1999). This annually updated document contains all of the internal documents developed by the Division of Environment during 1997 for the enforcement of environmental regulations and is available to the public.</li> <li>• Division of Environment - descriptive brochure</li> <li>• Pollution Prevention poster, bookmarks, and assessment for the general public</li> </ul> <p><b>SBAP</b></p> <ul style="list-style-type: none"> <li>• Here's What You Need to Know About RMP</li> <li>• Ammonia Handlers, Is Your RMP Ready?</li> <li>• Chlorine Handlers, Is Your RMP Ready?</li> <li>• Propane Handlers, Is Your RMP Ready?</li> <li>• Propane Marketers and EPA's Accident Prevention and Preparedness Rule</li> <li>• Hospitals Prescribe P2 Measures for the Environment</li> </ul> |



**TABLE E-6  
(Continued)**

| STATE OR<br>TERRITORY | 1998 SBTCP DOCUMENTS  |
|-----------------------|---|
| Kentucky              | <p>Air Quality Representative for Small Business</p> <ul style="list-style-type: none"> <li>• Kentucky Small Businesses Volunteer Success Stories About the Kentucky Business Environmental Assistance Program - brochure</li> <li>• Program description - updated brochure</li> <li>• National Small Business Assistance Centers - January 1998 column written and distributed to 11 state newsletters with circulation of 45,600 per mailing</li> <li>• National Metal Finishing Resource Center - March 1998 column distributed as above</li> <li>• Small Business Air Quality Stewardship Award Established - June 1998 column distributed as above</li> <li>• DAQ Field Operations Branch Sees All Across State - August 1998 column distributed as above</li> <li>• Three Kentucky Small Businesses First Recipients of Small Business Air Quality Stewardship Awards - October 1998 column distributed as above</li> <li>• Wells Ready Mix, Inc. and Pikeville Ready Mix Among First Recipients of Small Business Air Quality Stewardship Awards - column written for Kentucky Ready-Mixed Concrete Association Newsletter with circulation of 100</li> <li>• Presentation of Governor's Certificate of Recognition to Jon Trout by "Bo" Hoe, Incoming Chairman - January 1998 photo published in <i>Land, Air &amp; Water</i>, a publication of the Kentucky Natural Resources and Environmental Protection Cabinet with circulation of 13,000</li> <li>• Guest speaker Art Williams, Director, Jefferson County Air Pollution Control District - January 1998 photo published as above</li> <li>• Small Businesses Volunteer Success Stories - March 1998 story and photo published as above</li> <li>• Small Business Stationary Source Environmental Stewardship Award Established - March 1998 story with logo published as above</li> <li>• Small Business Panel Discusses New Laws - June 1998 story and photo published as above</li> <li>• Small Business Program Has New Web Site - June 1998 story and logo published as above</li> <li>• Three Kentucky Small Businesses First Recipients of Small Business Air Quality Stewardship Awards - December 1998 story and photos published as above</li> </ul> <p>KY Business Environmental Assistance Program</p> <ul style="list-style-type: none"> <li>• Newsletter</li> <li>• Air Quality Regulations That May Affect Your Small Business - booklet</li> <li>• 112(r) Handbook</li> </ul> |
| Jefferson Cty         | N/R   |
| Louisiana             | <p>Published and distributed over 5,000 newsletters, brochures, technical papers, and annual report:</p> <ul style="list-style-type: none"> <li>• SBAP Quarterly Newsletters</li> <li>• Are You in the Dry Cleaning Business? - brochure</li> <li>• What All Wood Finishers Need to Know - brochure</li> <li>• Surface Coating Business in Louisiana - technical paper</li> <li>• 1998 Annual Report</li> </ul>   |

**TABLE E-6  
(Continued)**

| STATE OR TERRITORY | 1998 SBTCP DOCUMENTS   |
|--------------------|--|
| Maine              | <ul style="list-style-type: none"> <li>• Dry cleaner fact sheets - simplifying regulations with model forms for recordkeeping</li> <li>• Environmental Compliance, A Quick and Easy Guide for Small Businesses - multimedia publication</li> </ul>   |
| Maryland           | N/R  |
| Massachusetts      | <ul style="list-style-type: none"> <li>• Auto Body CRASH COURSE and companion TOOLBOX</li> <li>• Materials for DPWs</li> </ul>   |
| Michigan           | <ul style="list-style-type: none"> <li>• Surface Coating of Metal Parts - fact sheet for the fabricated metals industry</li> <li>• Continuous Emission and Continuous Opacity Monitoring - fact sheet for general industry</li> <li>• Michigan Permit to Install: Guidebook for Determining Applicability - general industry</li> <li>• Understanding the Asbestos NESHAP - fact sheet for building demolition/renovators</li> <li>• What is an Air Contaminant? - general industry and public</li> <li>• Michigan Air Use Permit Technical Manual (Update) - general industry and air quality consultants</li> <li>• Regulatory Guidebook for Michigan's Lithographic Printing Industry - cooperative effort of SBAP and units in the MI Department of Environmental Quality's Environmental Assistance Division</li> <li>• Michigan Air Emission System (MAERS) Workbook - general industry</li> </ul> |
| Minnesota          | <ul style="list-style-type: none"> <li>• List of aqueous-based wood-finish manufacturers</li> </ul>  |
| Mississippi        | N/A  |
| Missouri           | <ul style="list-style-type: none"> <li>• Preventing Pollution in the Vehicle Maintenance Industry</li> <li>• Preventing Pollution at Rock Quarries</li> <li>• Preventing Pollution in Collision Repair</li> <li>• Preventing Pollution During Vehicle Salvage</li> <li>• Preventing Pollution in Lithographic Printing</li> <li>• Preventing Pollution in Flexographic Printing</li> <li>• Preventing Pollution in Screen Printing</li> </ul>  |
| Montana            | <ul style="list-style-type: none"> <li>• Section 112(r) Risk Management Plan Newsletter and Guidance Document - distributed to propane dealers, farm cooperatives, and small communities</li> <li>• Medical and Infectious Waste Incineration MACT Standard - fact sheet</li> <li>• Consumer Products MACT Standard - fact sheet</li> <li>• Architectural Coatings MACT Standard - fact sheet</li> <li>• Automobile Refinishing Coatings MACT Standard - fact sheet</li> <li>• Draft spray coating regulation for Montana</li> </ul>   |

**TABLE E-6  
(Continued)**

| STATE OR TERRITORY | 1998 SBTCP DOCUMENTS  |
|--------------------|---|
| Nebraska           | <ul style="list-style-type: none"> <li>Consultant Directory - provides names, addresses, points of contact, and types of services that consultant and engineering companies can perform for small businesses. Over 200 companies have provided information for publication in the directory. A matrix is provided for quick reference, and an index allows for separation between disciplines. The directory is divided into areas of interest for easily selecting the type of company that a small business may need.</li> </ul>                    |
| Nevada             | No new documents were prepared. Several existing documents were updated.  |
| New Hampshire      | <ul style="list-style-type: none"> <li>Small Business Guide to the Internet (assist small businesses in obtaining environmental compliance data from the Internet)</li> <li>Wood Finishing Manual (in conjunction with NEWMOA and NHDES P2 Program)</li> <li>Environmental, Health, &amp; Safety Checklist for Auto Repair Shops (in conjunction with NEWMOA)</li> </ul>  |
| New Jersey         | None  |
| New Mexico         | <ul style="list-style-type: none"> <li>Draft Regulations for Rock Crushers &amp; Asphalt Plants - fact sheet</li> <li>Draft Regulations for Concrete Batch Plants - fact sheet</li> <li>Enabling Language for General Construction Permits - fact sheet</li> <li>Public Notification for Air Quality Permitting - fact sheet</li> <li>General Construction Permit - for oil and gas compressor stations</li> </ul>  |
| New York           | <ul style="list-style-type: none"> <li>10 fact sheets describing compliance options for halogenated solvent degreasers, based on the NESHAP</li> <li>1 fact sheet describing capping options for sources with PTEs above major thresholds</li> <li>10 generic compliance plans for New York State dry cleaners (by equipment type and facility location)</li> <li>2 issues of Clean Air News (technical newsletter)</li> <li>Developed database and distributed lists of environmental consultants by geographic area as well as expertise</li> </ul> |
| North Carolina     | <ul style="list-style-type: none"> <li>Do You Need A Risk Management Plan? - workshop/training brochure on 112(r) and SARA Title III training</li> <li>Brochure (in progress) to help clients determine if they are subject to the chemical accidental release program</li> </ul>   |
| North Dakota       | None  |
| Ohio               | <p>SBO</p> <ul style="list-style-type: none"> <li>1997 Annual Report of the Ohio Air Quality Development Authority</li> <li>Air Focus - quarterly newsletter</li> <li>Clean Air Resource Center - updated fact sheet</li> </ul> <p>SBAP</p> <ul style="list-style-type: none"> <li>Extensive reorganization of SBAP web page -- included links to download permit application forms, Compliance Assistance Centers, CAGE/SAGE programs, P2 sites, and other state SBAPs</li> </ul>  |
| Oklahoma           | <ul style="list-style-type: none"> <li>Metal Recycler/Reclaimer - fact sheet on air and hazardous waste regulations</li> </ul>  |

**TABLE E-6  
(Continued)**

| STATE OR TERRITORY | 1998 SBTCP DOCUMENTS   |
|--------------------|--|
| Oregon             | <ul style="list-style-type: none"> <li>• Business Assistance Program - brochure announcing program</li> </ul>  |
| Pennsylvania       | <ul style="list-style-type: none"> <li>• General Permits in Pennsylvania: Faster and Easier Permitting</li> </ul>  |
| Puerto Rico        | N/R  |
| Rhode Island       | <ul style="list-style-type: none"> <li>• Air Pollution - auto body fact sheet</li> <li>• Hazardous Waste - auto body fact sheet</li> <li>• Water Pollution - auto body fact sheet</li> <li>• Pollution Prevention - auto body fact sheet</li> <li>• OSHA - auto body fact sheet</li> </ul>   |
| South Carolina     | <ul style="list-style-type: none"> <li>• Consumer Products Manual</li> </ul>   |
| South Dakota       | N/R  |
| Tennessee          | <ul style="list-style-type: none"> <li>• 112(r) Tennessee Workshop Manual</li> <li>• 112(r) general overview brochure</li> <li>• 112(r) chemical listing brochure</li> <li>• 112(r) slide presentation</li> <li>• Clean Air Act Overview Workshop Manual</li> <li>• 112(r) Workshop Announcement - brochure.</li> <li>• Clean Air Act Workshop Announcement - brochure</li> <li>• Consumer Products Workshop Announcement - brochure</li> <li>• Printing Teleconference Announcement - brochure</li> </ul> |
| Texas              | <ul style="list-style-type: none"> <li>• Metal Finishers Guide</li> <li>• Auto Repair Guide</li> <li>• Site Visit Card</li> <li>• Do You Need A Permit? - card produced under contract</li> <li>• Storm Water Frequently Asked Questions - brochure</li> </ul>   |
| Utah               | <ul style="list-style-type: none"> <li>• New Clean Air Regulations &amp; Your Utah Business</li> <li>• Pollution Prevention for Wood Furniture Manufacturers</li> </ul>  |
| Vermont            | <ul style="list-style-type: none"> <li>• Vehicle Service &amp; Repair Technician's Guide to Vermont's Environmental Regulations - Summer 1998 manual</li> </ul>  |
| Virginia           | <ul style="list-style-type: none"> <li>• Internet Training Guide</li> <li>• Program and Internet Web Sites - fact sheets</li> </ul>  |

**TABLE E-6  
(Continued)**

| STATE OR TERRITORY | 1998 SBTCP DOCUMENTS   |
|--------------------|--|
| Virgin Islands     | <ul style="list-style-type: none"> <li>• Exterminating &amp; Pest Control</li> <li>• Medical Laboratories</li> <li>• Quality Assurance Laboratories</li> <li>• Janitorial Services</li> </ul>  |
| Washington         | <p>OAPCA</p> <ul style="list-style-type: none"> <li>• Spray Coating Operations: An Informational Summary of Regulatory Guidelines for Thurston County, Washington</li> </ul> <p>SCAPCA</p> <ul style="list-style-type: none"> <li>• Things Your Business Should Know About Reducing Air Pollution</li> <li>• Fiberglass and Composite Manufacturing</li> <li>• Controlling Dust in Spokane County</li> <li>• Update - newsletter</li> <li>• Various compliance information sheets and posters</li> </ul>   |
| West Virginia      | <ul style="list-style-type: none"> <li>• Multimedia Assistance - draft brochure</li> <li>• Small Business Guide to OAQ Permitting - expected to be finalized in 1999</li> </ul>  |
| Wisconsin          | <ul style="list-style-type: none"> <li>• Maximum Theoretical Emissions Calculations - fact sheet</li> <li>• 112(r) - fact sheet</li> <li>• Numerous revisions of existing publications</li> </ul>  |
| Wyoming            | <ul style="list-style-type: none"> <li>• Auto Service/Auto Body Shop Multimedia Checklist</li> <li>• Contractor Multimedia Checklist</li> <li>• Dry Cleaner Multimedia Checklist</li> <li>• Medical Facility Multimedia Checklist</li> <li>• Printer Multimedia Checklist</li> <li>• Small Mining Operations Multimedia Checklist</li> <li>• Oil Field Service and Wellhead Multimedia Checklist</li> <li>• Hazardous Waste Disposal - non-regulatory brochure</li> <li>• Septic Systems - non-regulatory brochure</li> <li>• Wellhead Protection - non-regulatory brochure</li> <li>• Household Hazardous Waste and Paint Disposal - non-regulatory brochure</li> <li>• Proper Management of Farm Wastes - non-regulatory brochure</li> </ul> |

**TABLE E-7  
NOTABLE OUTREACH METHODS**

| <b>PROGRAM</b>       | <b>NOTABLE OUTREACH METHODS</b>  |
|----------------------|--|
| Alabama              | N/R  |
| Alaska               | <b>Site visits</b> are the most cost effective form of outreach. Direct and customized service are offered. Measurement of the results also became easier, since a direct relationship with a business has been established. Last year, Alaska's auto service sector initiative achieved a 96% compliance correction rate. A 98% compliance correction rate was achieved as a result of our work to help 50 small businesses improve hazardous waste management practices. These same businesses also considered 101 options for pollution prevention. |
| Arizona              | N/R  |
| Maricopa Cty         | <b>Direct mailings</b> from Environmental Services Director -- these letters introduced the Compliance Incentive Program (CIP), a <b>limited-time amnesty program</b> . The letter had more impact on businesses, because it was from the Director and mentioned possible enforcement action. The time limit appears to have encouraged businesses to call more quickly. Businesses were found using the <b>Internet yellow pages</b> .  |
| Arkansas             | <b>Workshops</b> have proven to be the most effective method of communication and recruiting clients. <b>Mailings</b> represent a low percentage of return, but also are effective.  |
| California           | <b>Permit renewal inspections.</b>   |
| South Coast          | Building and Safety Department Program -- <b>One-on-one direct contact</b> was made with the agencies in each city in South Coast's jurisdiction. Target is to contact all 172 cities to inform them of permitting requirements by the end of this fiscal year. Effectiveness of the efforts is being measured by the increase in the number of permit clearance letters issued as a result of the program.  |
| Colorado             | Last quarter of 1998: SBAP team initiated a 25 per month per member (3x25=75/month) <b>site visit program</b> . A portion of their targeted sources consisted of various businesses that were due to renew their Air Pollution Emission Notices (APEN).<br><br>Initiated and conducted <b>industry-specific workshops</b> .  |
| Connecticut          | <b>Intensive outreach, and focused and hands-on training</b> yielded high number of permit applications submitted and a high degree of accuracy of submissions.  |
| Delaware             | <b>Face-to-face on-site meetings.</b>  |
| District of Columbia | SBAP is a permit engineer. When she gets any permit question, she uses the opportunity to inform the sources about some regulations that may apply to that specific source category. ( <b>direct communication</b> )   |

**TABLE E-7**  
**(Continued)**

| PROGRAM  | NOTABLE OUTREACH METHODS   |
|----------|--|
| Florida  | <p>2,130 <b>dry cleaner calendars</b> distributed state-wide improved compliance with recordkeeping requirements. (130 businesses were designated as a project group for this data. An additional 2,000 calendars were distributed, yielding 2,130 total calendars distributed.) Improvements in compliance from 1996-1998:</p> <p>Broward County: 20%/1996 to 98%/1998.<br/> Orange County: 10%/1996 to 50%/1998.<br/> Central District: 6%/1996 to 71%/1998.</p> <p>Average compliance improvement was 61%.</p>  |
| Georgia  | <p><b>Calendar for dry cleaners</b> to use for recordkeeping. Will survey dry cleaners in 1999 to gauge effectiveness of calendar. Florida uses a similar calendar, and has reported record keeping compliance rates increased from 10% to 95%.</p>  |
| Hawaii   | <p>All dry cleaners in the state (62), whether regulated or not, were reached with a <b>mailing</b>. They all received compliance information and record of the <b>focus group meeting</b>, which had been attended by 16 drycleaners from around the state. Two of the three dry cleaners on Kauai attended the technical assistance workshop in Lihue; the remaining dry cleaner had already received compliance assistance information.</p> <p>Focus group sessions also were established for 13 trade associations and 31 small business advocacy groups. Both of these focus groups contributed to the development of a skeletal framework for the SBO.</p>   |
| Idaho    | <p>Almost all outreach was conducted over the <b>phone or via e-mail</b>. Beginning in January 1999, the SBO will begin conducting regular site visits.</p>  |
| Illinois | <p>SBAP is partnering with the IL Office of Pollution Prevention and the Small Business Development Network to provide graduate students to do <b>P2 assessments</b> of SBDC clients. The program was tried in Summer 1998 on a limited basis, and SBAP is pursuing a longer term pilot (Feb-June 1999). Resources were maximized by <b>combining IEPA P2 resources</b> with those of the SBAP, Procurement, Small Business Development, and Manufacturing Extension Centers.</p> <p>Small <b>Business Environmental Assistance Bulletin</b> - Summer, Autumn 1998. The bulletin has proven to be an excellent tool to inform clients of new documents and program projects. Calls to the helpline have increased as a result of the quarterly bulletin.</p> |

**TABLE E-7  
(Continued)**

| PROGRAM | NOTABLE OUTREACH METHODS   |
|---------|--|
| Indiana | <p>Dry cleaners: Regional <b>compliance workshops</b> were well received by the 77 dry cleaners in attendance. The majority of workshop evaluations were positive. No hard data that what we are doing improves compliance for IN dry cleaners, but compliance workshops and on-site visits are getting dry cleaners closer to full compliance, as some dry cleaners have fewer violations than those that are not visited or those that do not attend compliance workshops. <b>On-site assistance</b> was provided to those who requested a site visit. On-site assistance is particularly valuable to this industry, as this is sometimes the only type of assistance that truly helps small business owners understand the rules plus helps to build a good working relationship between the business owners and the SBAP.</p> <p>Vehicle Maintenance: <b>Compliance assistance workshops</b> were held throughout the state. Workshop evaluations were consistently positive. SBAP staff also provided <b>on-site assistance</b> to shops upon request. Shops were very appreciative of this service.</p> <p>Wood Furniture: Three <b>workshops</b> on the wood furniture NESHAP were held before the December 7 compliance deadline. The workshops were aimed at the environmental managers of wood furniture industries. Comments provided indicated the training was helpful, especially in providing information on new requirements, what inspectors expect, types of fines, etc. <b>Reminder cards</b> were sent four times this year to the 47 wood furniture manufacturers subject to the NESHAP. Due dates for initial and semiannual compliance reports, information to include in reports, and where to find sample reports, were included on the card. Comments on the effectiveness of these cards were very positive.</p> <p>Fiberglass Reinforced Products: CTAP created and mailed approximately 211 <b>brochures</b> on "Environmental Information for Fiber Reinforced Product Manufacturers." Also mailed a pollution prevention final report to many manufacturers.</p> <p>Collision Repair/Auto Refinishing: <b>On-site visits and one-on-one discussions.</b></p> <p><b>Web Site:</b> CTAP web pages were hit 6,591 times in 1998. In January 1998, CTAP had 8 pages; by December 1998, 42 web pages were up and running, covering subjects such as CTAP confidentiality, dry cleaners, mercury, vehicle maintenance, wood furniture, and fiberglass. Most often visited are the mercury pages, the dry cleaner 5-star recognition program database search, and the vehicle maintenance and dry cleaner compliance assistance manuals.</p> <p><b>TRI Workshops:</b> Toxics Release Inventory workshops were held in five separate locations throughout IN. The workshops reached more than 250 businesses that either are required to report or need assistance to determine if they are required to report. These workshops, along with more than 200 phone calls to assist reporters. Have significantly increased the quality and accuracy of reporting. IN's SBAP is working with the newly added TRI industries, including electric utilities, for the next reporting year. Of the TRI releases reported in IN, 95% of these releases are to air.</p> <p>Mercury Awareness Program: All 92 IN counties offered free <b>mercury collections</b> to IN households during October 1998. More than 2,000 pounds of mercury were collected and kept from IN lakes, rivers, streams, landfills, and incinerators.</p> |
| Iowa    | <p>SBAP did not conduct any special targeted outreach. We have a backlog of over 200 requests for site visits. Following are examples of how clients were referred: state DNR and EPA (infrequently) inspectors, trade associations and business groups, client referrals, SBO referrals, referrals from other IWRC programs.</p>  |



**TABLE E-7**  
**(Continued)**

| PROGRAM  | NOTABLE OUTREACH METHODS  |
|----------|---|
| Kansas   | <p>KDHE Division of Environment provides an <b>annual environmental conference</b>. The ombudsman coordinates this conference, which focuses on compliance, new technologies, and pollution prevention. The conference has grown from about 150 participants to 350 in 1998. A conference evaluation is given to attendees and continues to provide almost exclusively positive remarks. A focus of the conference each year is the availability of free assistance. After the conference each fall, a marked increase in numbers of calls is noted, as well as an increase in requests to be placed on mailing lists for the Kansas Environmental News and the Kansas AIRLines newsletter. Additionally, for the last two years, seminars on Environmental Management Systems have been offered by the SBEAP, which has stimulated interested in EMS. The target audience is businesses and community representatives, although a majority of attendees are from medium to small businesses.</p> <p>Second, the ombudsman has developed, with the cooperation of numerous other agencies, a <b>Small Business Assistance Group</b>. The SBAG is comprised of the SBA, SBDC, KS Department of Commerce and Housing, KS Department of Revenue, Human Resources, Aging, Secretary of State, and many other state and federal agencies. This group presented two seminars in different locations in the state for people thinking of starting a new business. The seminars were in the evening, and representatives, including the SBAP and the Division of Environment staff, explained requirements, services, and other important information to those starting a new business. Over 140 people attended the seminars, which were very well received. The goal of the seminars is to provide good information before a business is started in order to avoid problems in the future. The cooperative effort of the state/federal agencies has been outstanding, and two more seminars are planned for 1999.</p> <p>Technical assistance is <b>working more with trade associations</b> to promote programs. This provides "buy in" and reduces promotional and organizational costs. This year, we spoke to 60 people from the KS Fertilizer and Chemical Association and KS Farmers Service on RMP requirements under 112(r). The same subject was covered with 80 attendees from the KS Propane Marketers Association at their annual meeting. We also met with members of KS Water Environment Association and the KS Chapter of the American Wastewater Association on chlorine RMP. We presented compliance requirements to the Korean Dry Cleaners Association in Kansas City. We collaborated with a vendor to present a workshop on feedlot dust and lagoon management. We also worked with ink suppliers to sponsor the Screen Printers teleconference in two locations and worked with MO SBAP technical assistance on the downlink for the Kansas City site. Through the KS State University Extension radio station, which covers the entire state, we provided a 35 minute radio show on underground storage tanks.</p> <p>The Division of Environment made several <b>general and specific program presentations at local, state, and regional meetings</b>, including: Kansas City Chapter of the Society for Turbidity and Lubrication Engineers, City of Wichita Pretreatment Workshop, KS Water Environment Association Industrial Pretreatment Workshop and Operator Training, KS Health and Safety Conference, KS Association of Sanitarians and the KSU Research and Extension Annual Conference, and the Association of Metropolitan Sewerage Agencies.</p> |
| Kentucky | <p>A cost effective method of outreach for KY has been the <b>column</b> written six times per year by the Air Quality Representative for Small Business. The column is distributed to 11 statewide trade associations and business promotion newsletters with a circulation of 45,600 per mailing.</p> <p>The Division for Air Quality's <b>regulatory notification program</b> that provides information on KBEAP to businesses that are possibly affected by new rules also is effective.</p>  |

**TABLE E-7  
(Continued)**

| PROGRAM       | NOTABLE OUTREACH METHODS  |
|---------------|---|
| Jefferson Cty | N/R   |
| Louisiana     | Several SBAP engineers attended and were guest speakers at 43 <b>meetings, conferences, and seminars</b> with 1,694 attendees. Manned <b>informational booths</b> at two conferences with over 400 attendees. Interviewed by a <b>radio</b> station in north LA. Participated in <b>public relations activities</b> (e.g., high school/college career days, etc.).  |
| Maine         | <b>Simplified regulatory documents and forms</b> combined with a <b>site visit</b> to all dry cleaners. SBTAP was able to visit all dry cleaners in the state in a short time.  |
| Maryland      | N/R   |
| Massachusetts | <p><b>Software offer</b> to solvent users generated a lot of <b>site visits</b>, and the software was well appreciated. It seems to help companies to control VOCs as well as track them.</p> <p>The <b>autobody project (workshops and plain language guide to regulations)</b> generated a lot of site visits and has helped many shops begin to grapple with environmental responsibilities.</p> <p>The schools project (chemical use/indoor air pollution) has generated much information that is useful in publicizing this issue.</p> <p>The <b>Department of Public Works project</b> has generated a high degree of interest and attention in addressing environmental problems from such facilities without the administrative costs of enforcement first.</p>   |
| Michigan      | <b>Asbestos NESHAP Workshop:</b> SBAP presented four statewide workshops on the notification, recordkeeping, and reporting requirements of the asbestos NESHAP. Planning for the agenda items and speakers required partnering with multiple state agencies and industry associations to find ways of marketing this workshop to a varied audience. The SBAP was able to convince its state consumer regulatory agency to offer <b>continuing education credits</b> for workshop attendance to those participants needing to maintain some level of statewide certification. The SBAP attracted an overwhelming number of participants (527 at all four workshops), many of whom were fulfilling the education requirement for their state certification. We believe that by offering the continuing education credits, we were able to better market this workshop and reach a wider and varied audience with this tangible benefit. |
| Minnesota     | Produced and distributed <b>video</b> tape for wood finishing industry. <b>Newsletter. Training programs.</b>   |
| Mississippi   | <b>One-on-one workshops</b> were extremely effective in communicating regulations. <b>Television talk shows and news interviews</b> were very effective in reaching a large number of sources.  |
| Missouri      | <b>Direct mailings</b> seem to be the most effective methods of contact. Attendance at workshops is always much greater when direct mailings are done. <b>On-site visits</b> seem to be effective in helping facilities achieve compliance. <b>Involvement of associations</b> is very important to reach the maximum number of facilities within industry sectors.   |

**TABLE E-7**  
**(Continued)**

| PROGRAM       | NOTABLE OUTREACH METHODS  |
|---------------|---|
| Montana       | <p><b>Site visits</b> -- excellent way to reach businesses to explain regulatory compliance and pollution prevention options.</p> <p><b>Workshops</b> -- advertising for workshops focusing on regulatory compliance and pollution prevention also were successful.</p> <p><b>Loan Program</b> -- proved to be successful in raising awareness about regulations, particularly underground storage tank standards. Enabled over 20 small, rural, service stations to stay in business.</p>  |
| Nebraska      | <p><b>Working with trade associations and professional groups</b> has brought trust and feedback to the state program.</p> <p>Organizations like NICE (Nebraska Industrial Counsel on the Environment) have allowed the SBAP to provide information and discuss issues with some of the leaders on both large and small businesses. These types of organizations are a cross section of all types of sectors and have developed some very good partnerships.</p>  |
| Nevada        | <p><b>Developing generic fact sheets and other outreach materials in cooperation with county air quality programs and sharing costs</b> as allowable makes outreach more cost effective. In some instances, the SBAP had the resources to develop outreach materials and the county agencies had funds for mailing.</p>   |
| New Hampshire | <p>Our <b>Automotive Industry Environmental Compliance Manual</b> continues to be extremely well received. We have distributed over 1,000 copies to date and will be reformatting and reprinting this manual in 1999. Improvements in compliance rates have been identified anecdotally, and we will be conducting a sampling survey in 1999.</p> <p>Our <b>newsletter</b> is sent to 3,000 small businesses, consultants, town officials, and others with very positive results.</p> <p><b>On-site assistance</b> continues to be the most effective outreach.</p> |
| New Jersey    | <p>The regulated community, as well as consultant and engineering firms, were targeted for mailings of state-sponsored air audit courses. This <b>targeted mailing to service providers</b> is intended to increase compliance within the regulated community.</p>  |
| New Mexico    | <p><b>Fact sheet/template</b> for Public Notification for Air Quality Permitting. Discuss with business representatives and public.</p>   |

**TABLE E-7  
(Continued)**

| PROGRAM        | NOTABLE OUTREACH METHODS   |
|----------------|--|
| New York       | <p><b>Postcards</b> -- The program began a new system of disseminating information to businesses regarding important regulatory changes or deadlines. The SBEO developed postcards with simple, single messages on them as a means of reminding businesses of upcoming deadlines or informing them of regulatory changes. Postcards are less expensive than letters to mail, and the simple messages caught the attention of business owners. Once the business owner contacted the SBEO, they were given the full spectrum of assistance, beyond the one issue described in the postcard that prompted the phone call. After initial compliance assistance was given, many callers were referred to the SBAP program for technical assistance.</p> <p><b>Trade Publications</b> -- In conjunction with the postcards, the program developed advertisements with the same simple, single message as the postcards. The SBEO logo and 1-800 phone number also were printed on the advertisements. The ads were placed in trade magazines and membership newsletters and served both to reinforce the message to business owners who had already seen the message once in the mail, and to reach industry consultants, vendors, equipment manufacturers, etc. who may have been missed in the mailing.</p> <p>Together, the post cards and the advertisements generated a large increase in phone calls to the ombudsman hotline. For example, over 90% of the dry cleaners who called the SBEO hotline after this campaign began indicated that they had heard of the service through a postcard or recent advertisement.</p> |
| North Carolina | <p><b>112(r) Workshops</b> -- This year, we did a joint training effort with the Division of Air Quality for all sources, particularly those affected by 112(r). Outreach efforts included <b>brochures, workshops for industry and staff, and the web site</b>. The web site and mailings contained general information on requirements, guidance on how to determine if these requirements applied, and what program particularly was appropriate for their facility. The total number of contacts was approximately 6,000. Many of those received or will receive three different informational mailings. Overall compliance improvement cannot yet be judged, since the deadline is not until June 21, 1999. This effort will continue in 1999.</p>  |
| North Dakota   | <p><b>Informational mailings</b> have been the most utilized outreach method. Individual contact is not practical, because there are so many sources that are potentially affected by the rules.</p>   |
| Ohio           | <p>SBAP continues to keep in <b>close correspondence with the inspectors and permit writers</b> located at five OH EPA field offices and seven local air agencies. This has caused an increase in the number of companies referred to the SBAP by the districts and has increased SBAP credibility. On several occasions, this also has allowed the SBAP to help companies peacefully resolve violations found during inspections and to avoid enforcement action.</p> <p>SBO has found it very productive to <b>provide program materials to all state legislators and their staff members</b> and to educate them about the program's potential benefits for constituents. This frequently results in a reference to the program in member's newsletters and presentations; this also has resulted in a couple of district meetings with small businesses. In addition, SBO had received a number of requests for assistance as a result of a business owner hearing about the program from his/her representative.</p>  |

**TABLE E-7  
(Continued)**

| PROGRAM        | NOTABLE OUTREACH METHODS  |
|----------------|---|
| Oklahoma       | The <b>wood furniture manufacturers workshop</b> on the NESHAP was particularly effective. We partnered with a local coatings manufacturer, and they hosted the workshop. The representative from the coatings company that worked with us is a member of our CAP.  |
| Oregon         | The <b>workshops for chromium electroplaters</b> were very successful, because this industry group was easy to identify.  |
| Pennsylvania   | SBO served as a trainer in a series of <b>training sessions</b> delivered by the PA Department of Community and Economic Development to small business service providers. The training introduced more than 500 service providers to the SBAP and resulted in an increased awareness of departmental programs, pollution prevention, and the small business technical assistance program.           |
| Puerto Rico    | Since the program is not in full operation, usually referrals for assistance come from other programs inside EQB.   |
| Rhode Island   | <b>On-site assistance</b> for autobody shops. <b>Satellite downlink conference</b> for screen printers.   |
| South Carolina | <b>Newsletter articles</b> were very effective. Calls for assistance usually increased immediately after the release of an article.   |
| South Dakota   | N/R   |
| Tennessee      | <p><b>CAA overview workshops</b> were repeated for the fourth year and attendance remained good. Over 250 businesses attended the workshops.</p> <p>In-house staff conducted <b>112(r) training</b>. Over 250 businesses attended the workshops. Requests have been made for industry-specific 112(r) workshops.</p> <p><b>On-site, one-on-one assistance</b> to small employers was effective.</p> |

**TABLE E-7  
(Continued)**

| PROGRAM        | NOTABLE OUTREACH METHODS   |
|----------------|--|
| Texas          | <p><b>Site Visit Program</b> -- Site visits were conducted for 177 small businesses in 1998. Surveys taken after the site visit found small businesses had made significant changes based on the consultant's recommendations. Site visits also spurred more small businesses to recycle and use environmentally friendly solvents, reduce waste, and cut disposal costs.</p> <p><b>EnviroMentor Program</b> -- This program matches volunteer environmental professionals with small businesses that need compliance assistance. EnviroMentors provide free, on-site, confidential assistance, including identifying areas of noncompliance, suggesting ways to cut costs, and assisting with permit applications. In 1998, eight businesses were reached for a total of 120 hours volunteered. Volunteers have saved small business owners over \$7,050 through voluntary assistance. In 50% of the matches, volunteers assisted businesses with hazardous waste management. Other areas of assistance included above ground storage tanks, stormwater permits, Voluntary Cleanup Program, and exemption from air permitting.</p> <p><b>Workshops</b> -- SBAP gave 35 workshops in 1998 on topics including metal finishing, auto body and auto service, chemical coating, printing, dry cleaning, and RCRA waste recordkeeping. Attendance at all workshops totaled over 1,391 people.</p> <p><b>Notification</b> -- SBAP performed 22 notifications on rules in 1998, reaching 22,749 customers. Following are the number of notifications/businesses reached for the higher-profile industries. Auto body/auto service: 2/11,508. Metal finishing: 2/1,139. Foundries: 2/255. Increases in compliance are measured via hotline calls.</p> <p><b>Hotline</b> -- 1,865 hotline call from all industry groups were received in 1998.</p> |
| Utah           | N/R  |
| Vermont        | <p><b>Workbooks</b> mailed out for the vehicle service industry and followed with nine <b>regional workshops</b>, which had over 135 attendees. Received many follow up calls for on-site assistance or for more information about specific regulations.</p>   |
| Virginia       | <p>Continuing development of the <b>SBAP web site</b> (<a href="http://www.deq.state.va.us/osba/smallbiz.html">www.deq.state.va.us/osba/smallbiz.html</a>) has been successful in providing compliance and pollution prevention information. We averaged approximately 300 hits per month in 1998. The EPA Leadership Grant provided the opportunity to create this site; the grant will end in March 1999, but the site will continue with dedicated staff to provide assistance. Since the inception of the SBAP and with the addition of the Internet, we have reached or have the capability to reach in excess of 100,000 businesses.</p> <p>Direct compliance assistance outreach continues to provide the most effective vehicle for delivery of information and compliance assistance. Direct activity can take the form of <b>workshops, on-site visits, direct communication, phone, and one-on-one meetings</b>. We highly recommend <b>interacting with trade associations</b> as an absolutely necessary component to effective outreach.</p>   |
| Virgin Islands | <p><b>Mailings and correspondence</b> total was 9,213 brochures, 30 <b>manual information packets</b>, 5 <b>seminars</b>, and 10 <b>permit and compliance assistance</b>.</p>  |
| Washington     | SCAPCA: <b>Pre-visit survey</b> sent to 100 printers.  |

**TABLE E-7  
(Continued)**

| PROGRAM       | NOTABLE OUTREACH METHODS   |
|---------------|--|
| West Virginia | <b>Attending expos involving small businesses and distributing SBAP information.</b>   |
| Wisconsin     | <b>Workshops targeted to specific regulations, such as minor source permits, have been especially effective.</b>   |
| Wyoming       | <p>The Department, through its Office of Outreach (SBAP, SBO, P2 Coordinator, and Emergency Response Coordinator), publishes a <b>newsletter</b> tri-annually, which includes multimedia compliance information to our targeted business and government community, plus points of contact for additional information on the full range of environmental topics. Each issue of the newsletter is mailed/distributed to about 7,500 businesses and government entities and has consistently generated return calls.</p> <p>The staff from the Office of Outreach regularly travels throughout the state doing <b>one-on-one site visits</b> with small businesses in our targeted business categories. Our handout literature, business sector check sheets, and newsletter articles open doors to businesses that otherwise would be apprehensive talking to DEQ regulatory personnel. These one-on-one contacts routinely provide new opportunities for compliance assistance and P2 initiatives. The Office has conducted over 500 one-on-one site visits this calendar year.</p> |

**TABLE E-8  
SBTCP WEB PAGES**

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

| Program      | Web Page Address  | Usage During Report Period           | Comments Received   |
|--------------|---|--------------------------------------|---|
| Alabama      | www.adem.state.al.us  | N/R                                  | N/R   |
| Alaska       | www.state.ak.us/local/akpages/ENV.CONSERV/dsps/compass/cao_home.htm | No counter at this time              | Our clients can provide feedback by using our standard feedback form. We supply clients with this form when we work with them. We have been receiving feedback for the past several years. Responses indicate that our clients value our services, and we maintain high ratings for service delivery, professionalism, and results. We have incorporated additional opportunities to provide feedback on our developing web site. We have not received very many feedback responses via the Internet. We have received anecdotal reports that clients like our web site. One person indicated that he had a hard time finding information on our web pages. SBAP is working with the Governor's Small Business Council to provide easier web site access to the broad range of small business services offered in AK. |
| Arizona      | www.adeq.state.az.us  | N/R                                  | N/R   |
| Maricopa Cty | www.maricopa.gov/sbeap  | 25,024                               | Since our home page includes other Department programs - water, food inspections, etc. - we get a huge variety of questions, which range from requests about food inspection to flood plain maps to animal waste.   |
| Arkansas     | www.state.ar.us   | N/A                                  | N/A   |
| California   | www.arb.ca.gov  | 2,543,656;<br>>50B bytes transferred | The web site has a contact button. We receive praise for our web site, particularly for the meta tags that enhance finding information using search words. We now have a search engine hit percentage of 90%.   |
| South Coast  | www.aqmd.gov  | N/A                                  | All comments on the home page are routed through the District's media office. Feedback specific to the small business portion of the home page is not readily available at this time. Comments on the web site overall have been positive. A major redesign of the AQMD web page is planned for 1999.   |
| Colorado     | www.cdphe.state.co.us/ic/sbomain1.html                              | Not known                            | Comments not solicited.   |
| Connecticut  | http://dep.state.ct.us  | N/A                                  | The most common request is to include more information on our web site.   |
| Delaware     | www.dnrec.state.de.us   | N/R                                  | N/R   |



**TABLE E-8  
(Continued)**

| Program              | Web Page Address  | Usage During Report Period | Comments Received   |
|----------------------|---|----------------------------|---|
| District of Columbia | None  | N/R                        | N/R   |
| Florida              | <a href="http://www.dep.state.fl.us/air/outreach/sbap/sbap1.htm">www.dep.state.fl.us/air/outreach/sbap/sbap1.htm</a>  | 1,360                      | We do not have a "chat room," but people can e-mail to any listed staff member. We do not typically get any e-mails derived from the web site.  |
| Georgia              | <a href="http://www.gasmbiz.org">www.gasmbiz.org</a>  | 81 (from 11/4-12/31/98)    | We currently are not asking for feedback or comments on the web site. Immediately after the new site was established, we requested comments from other states, Region IV small business contacts, and our CAP.                              |
| Hawaii               | None  | N/R                        | N/R   |
| Idaho                | <a href="http://www2.state.id.us/deq">www2.state.id.us/deq</a>  | N/A                        | We asked for feedback until November. We stopped as we didn't have a full time web master who could handle or distribute incoming requests, suggestions, comments, etc.   |
| Illinois             | <a href="http://www.epa.state.il.us">www.epa.state.il.us</a><br><a href="http://www.commerce.state.il.us">www.commerce.state.il.us</a>  | 1,962                      | N/A   |
| Indiana*             | <a href="http://www.state.in.us/idem/ctap">www.state.in.us/idem/ctap</a>  | 1,650                      | We do not ask for comments.   |
| Iowa                 | <a href="http://www.state.ia.us/sbro">www.state.ia.us/sbro</a><br><a href="http://www.iwrc.org">www.iwrc.org</a>  | SBO +3,000<br>SBAP ~14,000 | SBO - We ask for comments, none received.<br>SBAP - We ask for comments. IWRC site recorded 1,163 user sessions per month. Average time spent per user is 17.5 minutes. On average, 22 different counties accessed IWRC web site per month. |
| Kansas               | <a href="http://www.sbeap.niar.twsu.edu">www.sbeap.niar.twsu.edu</a><br><a href="http://www.kdhe.state.ks.us">www.kdhe.state.ks.us</a>  | 4,925                      | Our feedback has been exclusively positive and extremely complimentary. We often get OSHA questions, which we refer to appropriate agencies.  |
| Kentucky             | <a href="http://www.state.ky.us/agencies/nrepc/dep/smbizair">www.state.ky.us/agencies/nrepc/dep/smbizair</a><br><a href="http://gatton.gws.uky.edu/KentuckyBusiness/kbeap/kbeap.htm">http://gatton.gws.uky.edu/KentuckyBusiness/kbeap/kbeap.htm</a> | KBEAP 800                  | Air Quality Representative for Small Business does not. Feedback is requested by KBEAP. None has been received to date.   |
| Jefferson Cty        | None  | N/R                        | N/R   |
| Louisiana            | <a href="http://www.deq.state.la.us/oarp/sbap/sbap.htm">www.deq.state.la.us/oarp/sbap/sbap.htm</a>  | 12,608                     | None.   |
| Maine                | <a href="http://www.state.me.us/dep">www.state.me.us/dep</a>  | N/A                        | We are not soliciting feedback at this time on the home page.   |
| Maryland             | <a href="http://www.mde.state.md.us">www.mde.state.md.us</a>  | N/A                        | Do not ask for feedback.  |
| Massachusetts        | <a href="http://www.magnet.state.ma.us/ota">www.magnet.state.ma.us/ota</a>  | 1,200                      | No significant comments received.   |
| Michigan             | <a href="http://www.michigan.org">www.michigan.org</a><br><a href="http://www.deq.state.mi.us/ead/eosect/caap">www.deq.state.mi.us/ead/eosect/caap</a>  | 1,911                      | Feedback is not actively solicited, but the SBAP receives it anyway.  |

**TABLE E-8  
(Continued)**

| Program        | Web Page Address   | Usage During Report Period                                      | Comments Received   |
|----------------|--|---|---|
| Minnesota      | <a href="http://www.pca.state.mn.us/programs/sbomb_p.html">www.pca.state.mn.us/programs/sbomb_p.html</a>   | Unknown   | N/R   |
| Mississippi    | <a href="http://www.deq.state.ms.us">www.deq.state.ms.us</a>   | Not tracked   | N/A   |
| Missouri       | <a href="http://www.dnr.state.mo.us/deq/tap/hometap.htm">www.dnr.state.mo.us/deq/tap/hometap.htm</a>   | 3,000   | We do not ask for feedback on our web site; however, we do receive phone calls from those who have visited our site. A couple of the comments received are: We need to have more of our publications downloadable. Requests have been made for permit forms and applications on the site for downloading. |
| Montana        | <a href="http://www.deq.state.mt.us">www.deq.state.mt.us</a>   | N/A   | N/A   |
| Nebraska       | <a href="http://www.deq.state.ne.us">www.deq.state.ne.us</a>   | 11,000+   | N/R   |
| Nevada         | <a href="http://www.state.nv.us/ndep/sba/sba01.htm">www.state.nv.us/ndep/sba/sba01.htm</a>   | N/A   | Web site will be implemented in early 1999. No comments available.  |
| New Hampshire  | pending  | N/A   | Not yet completed.  |
| New Jersey     | <a href="http://www.state.nj.us/commerce/caasbo.htm">www.state.nj.us/commerce/caasbo.htm</a><br><a href="http://www.state.nj.us/dep/aqm/sbap.htm">www.state.nj.us/dep/aqm/sbap.htm</a> | SBO 650<br>SBAP 1,218   | None.   |
| New Mexico     | <a href="http://www.nmenv.state.nm.us">www.nmenv.state.nm.us</a>   | ~4,000  | N/R   |
| New York       | <a href="http://www.empire.state.ny.us/sbeo/">www.empire.state.ny.us/sbeo/</a><br><a href="http://www.nysefc.org">www.nysefc.org</a>   | 687<br>(9/1-12/31/98)   | N/R   |
| North Carolina | <a href="http://www.p2pays.org">www.p2pays.org</a>   | ~2,000  | We have received a number of questions, which most often are for information on financial assistance and how to start a business. Most of our traffic comes through the Department of Pollution Prevention links. We will be revising the web site and tracking the hits we get to better respond.        |
| North Dakota   | <a href="http://www.health.state.nd.us">www.health.state.nd.us</a>   | Unknown   | We ask for comments.  |
| Ohio           | <a href="http://www.state.oh.us/carc/">www.state.oh.us/carc/</a><br><a href="http://www.epa.ohio.gov/dapc/sba/sbaintro">www.epa.ohio.gov/dapc/sba/sbaintro</a>                         | SBO 1,441 hits from 882 sources (6 mo.)<br><br>SBAP not tracked | SBO - 5-10 businesses have stated they learned about the Clean Air Resource Center on the web site.<br><br>SBAP - No comments have been received, although a handful of industries reported learning of us through the web.   |
| Oklahoma       | <a href="http://www.deq.state.ok.us">www.deq.state.ok.us</a>   | N/A   | Yes, we do ask for comments, but have not received any thus far.  |

N/A Not applicable    N/R No response

**TABLE E-8  
(Continued)**

| <b>Program</b> | <b>Web Page Address</b>  | <b>Usage During Report Period</b> | <b>Comments Received</b>   |
|----------------|--|-----------------------------------|--|
| Oregon         | <a href="http://www.deq.state.or.us">www.deq.state.or.us</a>   | N/R                               | N/R  |
| Pennsylvania   | <a href="http://www.dep.state.pa.us">www.dep.state.pa.us</a>   | 6,810+                            | Do not ask for comments.   |
| Puerto Rico    | None   | N/R                               | N/R  |
| Rhode Island   | <a href="http://www.state.ri.us/dem">www.state.ri.us/dem</a>   | N/A                               | Do not ask for comments.   |
| South Carolina | <a href="http://www.state.sc.us/eqc/admin/html/sbap.html">www.state.sc.us/eqc/admin/html/sbap.html</a>   | 931                               | Feedback is requested. No comments received.   |
| South Dakota   | <a href="http://www.state.sd.us">www.state.sd.us</a>   | 5,200                             | Yes! Usually receive questions on radon, feed lots, odors, etc. We also get requests from students.  |
| Tennessee      | <a href="http://www.state.tn.us/environment">www.state.tn.us/environment</a>   | N/A                               | Feedback not requested. The number of hits is included with Division total, and separation of information is not available.  |
| Texas          | <a href="http://www.tnrcc.state.tx.us/exec/small_business">www.tnrcc.state.tx.us/exec/small_business</a>   | ~2,200                            | We do request comments. These include technical questions about compliance issues for various industries, available publications, and how to participate in the EnviroMentor program.  |
| Utah           | <a href="http://www.deq.state.ut.us/eqoas/bus_home.htm">www.deq.state.ut.us/eqoas/bus_home.htm</a><br><a href="http://www.deq.state.ut.us/eqair/permits/sbap3.htm">www.deq.state.ut.us/eqair/permits/sbap3.htm</a> | N/A                               | We do ask for comments, but there has been none.   |
| Vermont        | <a href="http://www.anr.state.vt.us/dec/ead/eadhome.htm">www.anr.state.vt.us/dec/ead/eadhome.htm</a>   | N/A                               | N/A  |
| Virginia       | <a href="http://www.deq.state.va.us/osba/smallbiz">www.deq.state.va.us/osba/smallbiz</a>   | 3,616                             | We have not received enough on-line feedback to classify comments.   |
| Virgin Islands | None   | N/R                               | N/R  |
| Washington     | <a href="http://www.wa.gov/ecology">www.wa.gov/ecology</a>   | Several thousand                  | Want to be able to complete registration and application forms electronically.   |
| West Virginia  | <a href="http://www.dep.state.wv.us/oaq">www.dep.state.wv.us/oaq</a>   | N/A                               | We haven't received any specific feedback on the web site, but have received positive feedback on the overall SBAP program.  |
| Wisconsin      | <a href="http://www.commerce.state.wi.us">www.commerce.state.wi.us</a>   | 17,040                            | General feedback is not available for our section of the WI Department of Commerce web site.   |
| Wyoming        | <a href="http://deq.state.wy.us">http://deq.state.wy.us</a>  | N/A                               | No formal feedback mechanism for our web page is in place at this time. However, we do get comments from individuals who access the site. Most ask for additional information or points of contact. A small number ask for assistance in downloading documents or finding related links. |

**TABLE E-8**  
**(Continued)**

**INFORMATION ON SBTCP WEB PAGES**

|              | INFORMATION AVAILABLE |                   |             |             |              |                     |          |                                    |         |            |                      |          |                    |                  |          |
|--------------|-----------------------|-------------------|-------------|-------------|--------------|---------------------|----------|------------------------------------|---------|------------|----------------------|----------|--------------------|------------------|----------|
|              | Program Description   | Contact Listings  | Regulations | Permit Info | Permit Forms | Emissions Inventory | Policies | Guidance Documents/<br>Fact Sheets | P2 Info | Multimedia | List of Publications | CAP Info | Calendar of Events | Links            | Other*   |
| AL           | x                     | x                 | x           | x           | x            |                     |          | x                                  |         |            |                      |          | x                  |                  |          |
| AK           | x                     | x                 | x           | x           | x            |                     | x        | x                                  | x       | x          |                      |          | x                  | x                |          |
| AZ           | x                     | x                 |             |             | x            | x                   |          | x                                  | x       | x          | x                    |          |                    | x                |          |
| Mari<br>copa | x                     | x                 | x           | x           | x            | x                   | x        | x                                  | x       |            | x                    |          | x                  | x                | x        |
| AR           | x                     | x                 | x           |             |              |                     |          |                                    |         |            |                      |          |                    |                  |          |
| CA           | x                     | x                 | x           | x           | x            | x                   | x        | x                                  | x       | x          | x                    |          | x                  | x                |          |
| S.<br>Cst.   | x                     |                   | x           | x           | x            | x                   | x        | x                                  |         | x          | x                    | x        | x                  | x                | x        |
| CO           | x                     | x                 | x           | x           | x            |                     | x        | x                                  | x       |            | x                    |          | x                  | x                |          |
| CT           | x                     | x                 |             | x           | x            |                     | x        | x                                  | x       | x          | x                    | x        |                    | x                |          |
| DE           | x                     | x                 | x           | x           |              |                     | x        |                                    | x       |            |                      |          |                    | x                |          |
| DC           | N/A                   |                   |             |             |              |                     |          |                                    |         |            |                      |          |                    |                  |          |
| FL*          | x                     | x                 | x           | x           | x            | x                   |          | x                                  | x       | x          | x                    | x        | x                  | x                | x        |
| GA           | x                     | x                 | x           | x           | x            |                     | x        | x                                  | x       | x          | x                    | x        | x                  | x                |          |
| HI           | N/A                   |                   |             |             |              |                     |          |                                    |         |            |                      |          |                    |                  |          |
| ID           | x                     | x                 | x           | x           | x            |                     |          |                                    | x       | x          | x                    |          |                    | x                |          |
| IL           | x                     | x                 |             | x           | x            |                     |          | x                                  | x       |            |                      |          | x                  | x                | x        |
| IN           | x                     | x                 | x           | x           | x            | x                   | x        | x                                  | x       | x          | x                    |          | x                  | x                | x        |
| IA           | x                     | x                 |             |             |              |                     |          | x                                  | x       | x          | x                    |          |                    | x                | x        |
| KS           | x                     | x                 | x           | x           | x            | x                   | x        | x                                  | x       | x          | x                    | x        | x                  | x                | x        |
| KY           | Air rep.<br>KBEAP     | Air rep.<br>KBEAP | KBEAP       | KBEAP       | KBEAP        |                     |          | KBEAP                              | KBEAP   |            | KBEAP                | Air rep. | KBEAP              | Air rep.<br>BEAP | Air rep. |

N/A Not applicable    N/R No response

**TABLE E-8  
(Continued)**

|           | INFORMATION AVAILABLE |                  |             |             |              |                     |          |                                    |         |            |                      |          |                    |       |        |
|-----------|-----------------------|------------------|-------------|-------------|--------------|---------------------|----------|------------------------------------|---------|------------|----------------------|----------|--------------------|-------|--------|
|           | Program Description   | Contact Listings | Regulations | Permit Info | Permit Forms | Emissions Inventory | Policies | Guidance Documents/<br>Fact Sheets | P2 Info | Multimedia | List of Publications | CAP Info | Calendar of Events | Links | Other* |
| Jeff. Cty | N/A                   |                  |             |             |              |                     |          |                                    |         |            |                      |          |                    |       |        |
| LA        | x                     | x                | x           | x           | x            | x                   | x        | x                                  | x       |            | x                    | x        | x                  | x     |        |
| ME        | x                     | x                | x           | x           | x            | x                   | x        | x                                  | x       | x          | x                    |          | x                  | x     |        |
| MD        | x                     | x                |             | x           | x            |                     |          | x                                  | x       | x          |                      |          | x                  |       |        |
| MA        | x                     | x                | x           | x           | x            |                     | x        |                                    | x       | x          | x                    |          | x                  | x     | x      |
| MI        | x                     | x                | x           | x           |              |                     |          | x                                  |         |            | x                    | x        |                    | x     | x      |
| MN        | x                     | x                | x           | x           | x            | x                   | x        | x                                  | x       | x          | x                    |          |                    | x     | x      |
| MS        | x                     | x                |             |             |              |                     |          |                                    |         |            |                      |          |                    | x     |        |
| MO        | x                     | x                |             | x           |              |                     |          | x                                  | x       | x          | x                    |          | x                  | x     |        |
| MT        | x                     | x                |             | x           | x            |                     | x        |                                    |         |            |                      |          |                    |       |        |
| NE        | x                     | x                | x           | x           | x            |                     |          | x                                  |         | x          |                      |          | x                  | x     |        |
| NV        | x                     | x                | x           | x           | x            |                     |          | x                                  | x       | x          | x                    | x        |                    | x     |        |
| NH*       | x                     | x                | x           | x           | x            |                     | x        | x                                  | x       | x          | x                    |          | x                  | x     |        |
| NJ        | x                     | x                | x           | x           | x            |                     | x        | x                                  | x       | x          | x                    |          | x                  | x     |        |
| NM        | x                     | x                | x           | x           | x            | x                   | x        | x                                  | x       |            | x                    |          |                    | x     |        |
| NY        | x                     |                  | x           | x           |              |                     |          | x                                  | x       | x          | x                    |          |                    | x     | x      |
| NC        | x                     | x                |             |             |              |                     |          |                                    | x       |            |                      |          |                    |       |        |
| ND        | x                     | x                | x           | x           | x            | x                   | x        | x                                  |         | x          |                      |          |                    | x     |        |
| OH        | x                     | x                | x           | x           | x            |                     | x        | x                                  | x       | x          |                      |          |                    | x     | x      |
| OK        | x                     | x                | x           | x           | x            |                     |          | x                                  | x       | x          |                      | x        | x                  | x     |        |
| OR        | N/R                   |                  |             |             |              |                     |          |                                    |         |            |                      |          |                    |       |        |
| PA        | x                     | x                | x           | x           | x            | x                   | x        | x                                  | x       | x          | x                    | x        | x                  | x     |        |
| PR        | N/R                   |                  |             |             |              |                     |          |                                    |         |            |                      |          |                    |       |        |

N/A Not applicable    N/R No response

**TABLE E-8  
(Continued)**

|    | INFORMATION AVAILABLE |                  |             |             |              |                     |          |                                    |         |            |                      |          |                    |       |        |
|----|-----------------------|------------------|-------------|-------------|--------------|---------------------|----------|------------------------------------|---------|------------|----------------------|----------|--------------------|-------|--------|
|    | Program Description   | Contact Listings | Regulations | Permit Info | Permit Forms | Emissions Inventory | Policies | Guidance Documents/<br>Fact Sheets | P2 Info | Multimedia | List of Publications | CAP Info | Calendar of Events | Links | Other* |
| RI | x                     | x                | x           | x           |              |                     | x        |                                    |         |            |                      |          | x                  | x     |        |
| SC | x                     | x                | x           | x           | x            | x                   |          | x                                  | x       | x          | x                    |          |                    | x     |        |
| SD | x                     | x                | x           | x           | x            |                     |          |                                    |         | x          |                      |          | x                  | x     | x      |
| TN | x                     | x                | x           | x           | x            |                     | x        |                                    |         |            |                      |          |                    |       |        |
| TX | x                     | x                | x           | x           | x            | x                   | x        | x                                  | x       | x          | x                    | x        | x                  | x     |        |
| UT | x                     | x                | x           | x           | x            |                     |          |                                    | x       | x          |                      | x        |                    | x     |        |
| VT |                       |                  |             |             | x            |                     |          |                                    |         |            |                      |          |                    |       |        |
| VA | x                     | x                | x           | x           | x            | x                   | x        | x                                  | x       | x          | x                    | x        | x                  | x     |        |
| VI | N/R                   |                  |             |             |              |                     |          |                                    |         |            |                      |          |                    |       |        |
| WA | x                     | x                | x           | x           | x            | x                   | x        | x                                  | x       | x          | x                    | x        | x                  | x     | x      |
| WV | x                     | x                |             | x           | x            |                     | x        | x                                  | x       | x          |                      |          | x                  | x     |        |
| WI | x                     | x                |             |             |              |                     |          |                                    |         |            |                      |          |                    | x     |        |
| WY | x                     | x                | x           | x           | x            |                     | x        | x                                  | x       | x          | x                    | x        | x                  | x     |        |

**\*Notes & Other**

Maricopa County, AZ Pollution advisories, education, workshops/public hearings, enforcement, other Department programs.

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

FL Regulations, permitting information, permit forms, and emissions inventory are available on the Division page, not on the SBAP page. Guidance documents are found on the Division page; fact sheets on the SBAP page. P2 information and multimedia information are available on the FDEP page. Other -- some on-line or downloading documents.

IL News and announcements, bulletin.

IN Regulations, permitting information, permit forms, policies, and calendar of events on IDEM & Office of Air Management sites. Emissions inventory on Office of Air Management site. Other -- IN 5-Star Environmental Recognition Program for Dry Cleaners and Vehicle Maintenance Shops (application and information).

IA Other -- What's New?

KS Vendor lists, copies of newsletter, electronic downloading of documents, on-line order forms for printed documents, electronic question submission.

KY Other -- Small Business Air Quality Stewardship Award information.

MA Other -- Case studies. Regulations, permitting information, permit forms, and policies provided via links.

MI Other -- Training opportunities.

MN Other -- Environmental Improvement Loan Program.

**TABLE E-8**  
**(Continued)**

|    |  |
|----|--|
| NH | Planned. Web site not yet completed.   |
| NY | Information found on SBAP web site. Other -- back issues of newsletter, detailed compliance information by industry type (to be on web site by Spring 1999). |
| OH | Other -- mailbox for questions.  |
| SD | Other -- training.   |
| WA | Other -- newsletters.  |

**TABLE E-9  
CLEAN AIR ACT AND NON-AIR/MULTIMEDIA ASSISTANCE REQUESTS  
BY TYPE OF ASSISTANCE REQUESTED**

CAA = Clean Air Act Requests  
M = Non-air/Multimedia Requests

| State       | Compliance/<br>Regulatory<br>Information |     | Monitoring |    | Recordkeeping |    | Financial/<br>Funding<br>Information |     | Permitting |     | General CAA<br>Information |     | Add to<br>Mailing List |    | P2<br>Assistance |     | Other |     | Total<br>Requests |      |
|-------------|--|-----|------------|----|---------------|----|--------------------------------------|-----|------------|-----|----------------------------|-----|------------------------|----|------------------|-----|-------|-----|-------------------|------|
|             | CAA                                      | M   | CAA        | M  | CAA           | M  | CAA                                  | M   | CAA        | M   | CAA                        | M   | CAA                    | M  | CAA              | M   | CAA   | M   | CAA               | M    |
| AL          | 15                                       | 170 | 3          | 0  | 0             | 64 | 1                                    | 12  | 25         | 149 | 5                          | 0   | 0                      | 0  | 2                | 30  | 0     | 0   | 51                | 425  |
| AK          | 91                                       | 10  | 0          | 0  | 0             | 0  | 0                                    | 0   | 148        | 0   | 39                         | 0   | 0                      | 0  | 0                | 5   | 115   | 0   | 393               | 15   |
| AZ          | 62                                       | 256 | 0          | 20 | 5             | 0  | 0                                    | 26  | 25         | 115 | 38                         | 248 | 0                      | 0  | 4                | 22  | 91    | 365 | 225               | 1052 |
| Maricopa    | 100+                                     | 25  | 10         | 0  | 15            | 0  | 6                                    | 15  | 600+       | 0   | 3                          | 0   | 5                      | 0  | 25               | 10  | 0     | 50  | 764+              | 100  |
| AR          | 210                                      | 490 | 0          | 0  | 0             | 0  | 70                                   | 163 | 84         | 196 | 0                          | 0   | 0                      | 0  | 82               | 261 | 0     | 0   | 446               | 1110 |
| CA          | 5700                                     | 200 | 700        | 75 | 1700          | 50 | 75                                   | 25  | 950        | 75  | 250                        | 25  | 75                     | 25 | 650              | 50  | 200   | 75  | 10300             | 600  |
| South Coast | 524                                      | 0   | 582        | 0  | 0*            | 0  | 42                                   | 0   | 588        | 0   | 30                         | 0   | 0                      | 0  | 0                | 0   | 599   | 0   | 2365              | 0    |
| CO          | 410                                      | 41  | 11         | 0  | 130           | 18 | 13                                   | 4   | 340        | 11  | 26                         | 0   | 0                      | 0  | 0                | 2   | 31    | 0   | 961               | 76   |
| CT          | Not tracked                              |     |            |    |               |    |                                      |     |            |     |                            |     |                        |    |                  |     |       |     |                   |      |
| DE          | 25                                       | 20  | 0          | 0  | 0             | 0  | 0                                    | 0   | 50         | 15  | 20                         | 0   | 0                      | 0  | 0                | 0   | 0     | 0   | 95                | 35   |
| DC          | 12                                       | 0   | 10         | 0  | 8             | 0  | 0                                    | 0   | 10         | 0   | 4                          | 0   | 8                      | 0  | 0                | 0   | 0     | 0   | 52                | 0    |
| FL          | Not tracked                              |     |            |    |               |    |                                      |     |            |     |                            |     |                        |    |                  |     |       |     |                   |      |
| GA          | 200                                      | 15  | 0          | 0  | 30            | 0  | 12                                   | 0   | 57         | 2   | 220                        | 0   | 25                     | 0  | 5                | 1   | 105   | 0   | 654               | 18   |
| HI          | 12                                       | 8   | 2          | 0  | 0             | 0  | 0                                    | 0   | 5          | 5   | 10                         | 0   | 619                    | 0  | 2                | 0   | 0     | 0   | 650               | 13   |
| ID          | 114                                      | 20  | 50         | 0  | 0             | 0  | 0                                    | 0   | 803        | 0   | 0                          | 0   | 0                      | 0  | 0                | 2   | 0     | 0   | 967               | 22   |



**TABLE E-9  
(Continued)**

|           | Compliance/<br>Regulatory<br>Information |      | Monitoring |    | Recordkeeping |     | Financial/<br>Funding<br>Information |    | Permitting |    | General CAA<br>Information |     | Add to<br>Mailing List |    | P2<br>Assistance |      | Other |      | Total<br>Requests |      |
|-----------|--|------|------------|----|---------------|-----|--------------------------------------|----|------------|----|----------------------------|-----|------------------------|----|------------------|------|-------|------|-------------------|------|
| State     | CAA                                      | M    | CAA        | M  | CAA           | M   | CAA                                  | M  | CAA        | M  | CAA                        | M   | CAA                    | M  | CAA              | M    | CAA   | M    | CAA               | M    |
| IL        | 218                                      | 0    | 41         | 0  | 29            | 0   | 90                                   | 0  | 155        | 0  | 79                         | 0   | 46                     | 0  | 160              | 0    | 0     | 0    | 818               | 0    |
| IN        | Not tracked                              |      |            |    |               |     |                                      |    |            |    |                            |     |                        |    |                  |      |       |      |                   |      |
| IA        | 120                                      | 0    | 0          | 0  | 0             | 0   | 100                                  | 0  | 0          | 0  | 20                         | 0   | 0                      | 0  | 0                | 0    | 800   | 300  | 1040              | 300  |
| KS        | 84                                       | 77   | 1          | 0  | 0             | 2   | 0                                    | 10 | 3          | 2  | 107                        | 137 | 8                      | 25 | 17               | 20   | 22    | 38   | 242               | 285  |
| KY        | 600                                      | 300  | 100        | 25 | 300           | 50  | 50                                   | 10 | 400        | 25 | 650                        | 0   | 100                    | 0  | 75               | 10   | 100   | 0    | 2375              | 420  |
| Jeff Cty. | 72                                       | 0    | 0          | 0  | 35            | 0   | 0                                    | 0  | 168        | 0  | 0                          | 0   | 0                      | 0  | 0                | 0    | 0     | 0    | 275               | 0    |
| LA        | N/A                                      |      |            |    |               |     |                                      |    |            |    |                            |     |                        |    |                  |      |       |      |                   |      |
| ME        | 0  | 0    | 0          | 0  | 0             | 0   | 0                                    | 0  | 0          | 0  | 34                         | 0   | 0                      | 0  | 0                | 0    | 0     | 146  | 34                | 146  |
| MD        | 18                                       | 0    | 0          | 0  | 0             | 0   | 0                                    | 0  | 200        | 24 | 12                         | 0   | 0                      | 0  | 0                | 0    | 0     | 0    | 230               | 24   |
| MA        | 100+                                     | 200+ | 0          | 0  | 0             | 0   | 0                                    | 0  | 0          | 0  | 0                          | 0   | 0                      | 0  | 200+             | 400+ | 0     | 0    | 300+              | 600+ |
| MI*       | 285                                      | 0    | 0          | 0  | 0             | 0   | 0                                    | 0  | 236        | 0  | 837                        | 0   | 0                      | 0  | 0                | 0    | 0     | 0    | 1400              | 90   |
| MN        | 213                                      | 78   | 0          | 0  | 10            | 0   | 21                                   | 21 | 692        | 62 | 140                        | 47  | 5                      | 0  | 42               | 0    | 99    | 0    | 1222              | 208  |
| MS        | 30                                       | 0    | 15         | 0  | 15            | 0   | 15                                   | 0  | 210        | 0  | 300                        | 0   | 5                      | 0  | 10               | 0    | 5     | 0    | 605               | 0    |
| MO        | 772                                      | 1039 | 0          | 9  | 2             | 266 | 3                                    | 85 | 1131       | 61 | 804                        | 0   | 0                      | 0  | 0                | 295  | 55    | 2452 | 2767              | 4207 |
| MT        | 75                                       | 50   | 0          | 0  | 12            | 7   | 15                                   | 85 | 25         | 0  | 10                         | 0   | 0                      | 0  | 25               | 30   | 15    | 20   | 177               | 192  |
| NE        | 30                                       | 14   | 0          | 0  | 8             | 4   | 0                                    | 2  | 6          | 2  | 130                        | 0   | 8                      | 2  | 4                | 4    | 0     | 38   | 186               | 56   |
| NV        | Not tracked                              |      |            |    |               |     |                                      |    |            |    |                            |     |                        |    |                  |      |       |      |                   |      |
| NH        | x  | x    |            |    | x             | x   |                                      |    | x          | x  | x                          |     | x                      | x  | x                | x    | x     | x    | Not tracked       |      |
| NJ        | Not tracked                              |      |            |    |               |     |                                      |    |            |    |                            |     |                        |    |                  |      |       |      | 935 for both      |      |

**TABLE E-9  
(Continued)**

|       | Compliance/<br>Regulatory<br>Information |      | Monitoring |   | Recordkeeping |    | Financial/<br>Funding<br>Information |    | Permitting |     | General CAA<br>Information |    | Add to<br>Mailing List |   | P2<br>Assistance |    | Other |     | Total<br>Requests |           |
|-------|--|------|------------|---|---------------|----|--------------------------------------|----|------------|-----|----------------------------|----|------------------------|---|------------------|----|-------|-----|-------------------|-----------|
| State | CAA                                      | M    | CAA        | M | CAA           | M  | CAA                                  | M  | CAA        | M   | CAA                        | M  | CAA                    | M | CAA              | M  | CAA   | M   | CAA               | M         |
| NM    | 38                                       | 0    | 15         | 0 | 0             | 0  | 0                                    | 0  | 32         | 0   | 4                          | 0  | 0                      | 0 | 0                | 3  | 0     | 0   | 89                | 3         |
| NY    | 919                                      | 0    | 0          | 0 | 0             | 0  | 202                                  | 0  | 365        | 0   | 23                         | 0  | 74                     | 0 | 260              | 0  | 133   | 50  | 1976              | 50        |
| NC*   | 1220                                     | 1730 | 0          | 0 | x             | 0  | 0                                    | 0  | x          | x   | 0                          | 0  | 0                      | 0 | x                | x  | 0     | 0   | 1220+             | 1730<br>+ |
| ND    |  |      |            |   |               |    |                                      |    |            |     |                            |    |                        |   |                  |    |       |     | 100               | 400       |
| OH*   | 20%                                      | 0    | 2%         | 0 | 2%            | 0  | 2%/40%                               | 0  | 60%        | 0   | 1%                         | 0  | 2%                     | 0 | 1%               | 0  | 0     | 10% | 100%              |           |
| OK    | 264                                      | 133  | 0          | 0 | 3             | 0  | 0                                    | 0  | 480        | 0   | 2                          | 0  | 2                      | 0 | 0                | 0  | 0     | 0   | 751               | 133       |
| OR    | 81                                       | 4    | 1          | 0 | 1             | 0  | 8                                    | 0  | 5          | 0   | 4                          | 0  | 3                      | 0 | 31               | 0  | 0     | 0   | 134               | 4         |
| PA    | x  | x    | x          |   | x             |    | x                                    | x  | x          | x   | x                          |    | x                      |   | x                | x  |       |     | 828               | 175       |
| PR    | 24                                       | 17   | 0          | 0 | 0             | 0  | 0                                    | 0  | 14         | 8   | 0                          | 0  | 8                      | 2 | 0                | 0  | 10    | 12  | 56                | 39        |
| RI    | 32                                       | 174  | 0          | 0 | 0             | 0  | 0                                    | 0  | 12         | 121 | 11                         | 72 | 0                      | 0 | 20               | 39 | 17    | 121 | 92                | 527       |
| SC    |  |      |            |   |               |    |                                      |    |            |     |                            |    |                        |   |                  |    |       |     | 150               | 250       |
| SD    | x  | x    | x          |   | x             |    |                                      |    | x          |     | x                          |    |                        |   |                  |    |       |     |                   |           |
| TN    | 94                                       | 4    | 0          | 0 | 0             | 0  | 11                                   | 0  | 7          | 0   | 0                          | 0  | 15                     | 0 | 12               | 7  | 0     | 0   | 139               | 11        |
| TX    | 0  | 1681 | 0          | 0 | 0             | 0  | 0                                    | 30 | 0          | 0   | 0                          | 0  | 0                      | 0 | 0                | 0  | 0     | 298 | 0                 | 2009      |
| UT    | 109                                      | 10   | 5          | 0 | 20            | 0  | 0                                    | 5  | 100        | 5   | 60                         | 10 | 10                     | 0 | 10               | 0  | 0     | 0   | 314               | 25        |
| VT*   | 0  | 104  | 0          | 0 | 0             | 18 | 0                                    | 2  | 0          | 11  | 0                          | 0  | 0                      | 0 | 0                | 30 | 0     | 0   | 0                 | 165       |
| VA    | 248                                      | 21   | 2          | 0 | 1             | 1  | 11                                   | 9  | 87         | 0   | 40                         | 3  | 5                      | 1 | 3                | 14 | 217   | 32  | 614               | 81        |
| VI    | 5  | 0    | 0          | 0 | 5             | 0  | 2                                    | 0  | 50         | 0   | 75                         | 0  | 250                    | 0 | 2                | 0  | 0     | 0   | 389               | 0         |

**TABLE E-9  
(Continued)**

|                | Compliance/<br>Regulatory<br>Information |      | Monitoring |     | Recordkeeping |     | Financial/<br>Funding<br>Information |     | Permitting |     | General CAA<br>Information |     | Add to<br>Mailing List |    | P2<br>Assistance |      | Other |      | Total<br>Requests |       |
|----------------|--|------|------------|-----|---------------|-----|--------------------------------------|-----|------------|-----|----------------------------|-----|------------------------|----|------------------|------|-------|------|-------------------|-------|
| State          | CAA                                      | M    | CAA        | M   | CAA           | M   | CAA                                  | M   | CAA        | M   | CAA                        | M   | CAA                    | M  | CAA              | M    | CAA   | M    | CAA               | M     |
| WA             | 559                                      | 0    | 0          | 0   | 0             | 0   | 0                                    | 0   | 0          | 0   | 0                          | 0   | 0                      | 0  | 0                | 0    | 0     | 0    | 559               | 0     |
| WV             | 55                                       | 16   | 6          | 0   | 6             | 0   | 10                                   | 50  | 36         | 12  | 0                          | 0   | 0                      | 0  | 0                | 0    | 0     | 0    | 113               | 78    |
| WI             | 302                                      | 0    | 4          | 0   | 19            | 0   | 22                                   | 3   | 102        | 0   | 226                        | 0   | 17                     | 0  | 2                | 0    | 50    | 6    | 744               | 9     |
| WY             | 155                                      | 368  | 12         | 8   | 22            | 37  | 4                                    | 16  | 16         | 10  | 45                         | 0   | 20                     | 24 | 20               | 18   | 16    | 24   | 310               | 495   |
| Total          | 14197                                    | 7275 | 1570       | 137 | 2376          | 397 | 702                                  | 573 | 8217       | 911 | 4258                       | 542 | 1308                   | 79 | 1663             | 1253 | 2680  | 4027 | 39107             | 17113 |
| Grand<br>Total | 21742                                    |      | 1707       |     | 2773          |     | 1275                                 |     | 9128       |     | 4800                       |     | 1387                   |    | 2916             |      | 6707  |      | 56220             |       |

Notes:

South Coast      Figures for Recordkeeping included in Compliance/Regulatory.

MI      Breakout categories reflect customer assistance provided by SBAP only, while totals reflect activity by both SBO and SBAP.

NC      Compliance/Regulatory figures are an estimate of percentages by hotline, on-site, and some workshop. Recordkeeping requests come in frequently; no estimate of figures. Permitting questions occur in 90% of site visits, and about 70% of hotline calls are permit related. For P2 assistance, we work jointly with P2 for training and newsletter; training and newsletters are multimedia.

OH      Individual requests are not separated into these categories, so no exact data are available. However, the total requests can be separated into approximate percentages by type based on practical experience and judgement. SBO estimates the issue of financing comes up in 40% of its calls. This is directly related to SBO's function to provide financing assistance.

VT      Air included in multimedia requests.

**TABLE E-10  
MAJOR CAP ACTIVITIES**

| State        | Review of documents for readability and/or content | Appointment/hiring of staff/ election of officers | Review of SBO/SBAP outreach efforts | Review/comment on proposed/new regulations | Review/comment on state legislative actions | Definition of CAP responsibilities | Attendance by CAP members at training sessions, etc. | Meeting with small businesses/ associations | Other* |
|--------------|--|---|-------------------------------------|--|---|------------------------------------|--|---|--------|
| AL           | N/R  |   |                                     |  |   |                                    |  |   |        |
| AK           | x  | x   | x                                   |  | x   | x                                  | x  |   |        |
| AZ           | N/A  |   |                                     |  |   |                                    |  |   |        |
| Maricopa Cty | N/A  |   |                                     |  |   |                                    |  |   |        |
| AR           |  | x   | x                                   |  |   | x                                  |  |   |        |
| CA           | N/R  |   |                                     |  |   |                                    |  |   |        |
| South Coast  |  |   | x                                   | x  | x   | x                                  |  | x   |        |
| CO           | x  |   | x                                   | x  |   | x                                  | x  | x   |        |
| CT           | x  |   | x                                   | x  |   |                                    | x  | x   |        |
| DE           |  |   |                                     | x  |   | x                                  | x  |   |        |
| DC           |  |   |                                     | x  |   | x                                  | x  |   |        |
| FL           | x  |   | x                                   |  |   | x                                  |  |   | x      |
| GA           | x  | x   | x                                   | x  |   | x                                  | x  |   |        |
| HI           | N/R  |   |                                     |  |   |                                    |  |   |        |
| ID           | N/R  |   |                                     |  |   |                                    |  |   |        |
| IL           |  | x   | x                                   |  |   |                                    |  |   |        |
| IN           |  |   | x                                   |  | x   | x                                  |  |   |        |
| IA           | N/R  |   |                                     |  |   |                                    |  |   |        |
| KS           | x  | x   | x                                   | x  |   |                                    |  |   |        |
| KY           | x  |   | x                                   |  | x   | x                                  |  |   | x      |

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

**TABLE E-10  
(Continued)**

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

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

**TABLE E-10**  
**(Continued)**

| State | Review of documents for readability and/or content | Appointment/hiring of staff/ election of officers | Review of SBO/SBAP outreach efforts | Review/comment on proposed/ new regulations | Review/comment on state legislative actions | Definition of CAP responsibilities | Attendance by CAP members at training sessions, etc. | Meeting with small businesses/ associations | Other* |
|-------|--|---|-------------------------------------|---|---|------------------------------------|--|---|--------|
| PA    | x  | x   | x                                   | x   | x   | x                                  | x  | x   | x      |
| PR    |  |   |                                     |   |   |                                    | x*   |   | x      |
| RI    | N/O  |   |                                     |   |   |                                    |  |   |        |
| SC    |  |   | x                                   |   |   |                                    |  |   |        |
| SD    |  |   |                                     |   |   |                                    |  |   | x      |
| TN    | N/O  |   |                                     |   |   |                                    |  |   |        |
| TX    | x  | x   | x                                   | x   |   | x                                  | x  | x   |        |
| UT    | x  | x   | x                                   |   |   | x                                  |  |   | x      |
| VT    | x  |   | x                                   |   |   |                                    | x  |   |        |
| VA    | x  | x   | x                                   |   |   | x                                  | x  | x   |        |
| VI    | N/O  |   |                                     |   |   |                                    |  |   |        |
| WA    | x  |   |                                     |   |   |                                    |  |   |        |
| WV    | x  |   | x                                   | x   | x   |                                    |  |   |        |
| WI    | x  | x   | x                                   | x   | x   |                                    | x  | x   |        |
| WY    |  |   | x                                   | x   | x   | x                                  | x  |   | x      |

**TABLE E-10**  
**(Continued)**

**\*Notes and Other:**

|    |   |
|----|---|
| FL | Other -- Annual state CAP meeting.  |
| KY | Other -- Awarding first Small Business Air Quality Stewardship Awards.  |
| MI | Michigan's CAP did not meet in 1998.  |
| MN | The CAP currently is dormant pending re-assignment by a newly elected administration.                             |
| PA | Other -- For the first time, a meeting was coordinated with a site visit.   |
| PR | State representative only assigned member. Other -- State representative, CAP member helped outline SBAP program. |
| SD | CAP did not meet in 1998.   |
| UT | Other -- Lieutenant Governor's Small Business Advisory Council.   |
| WY | Other -- Promoted Voluntary Disclosure Rule/Confidentiality Policy.   |

**TABLE E-11  
FINANCIAL ASSISTANCE PROGRAMS TO HELP SMALL BUSINESSES  
COMPLY WITH CAA REQUIREMENTS**

| PROGRAM              | DATE AVAILABLE | NAME OF GRANT/LOAN                             | FUNDING LEVEL  |
|----------------------|----------------|--|--|
| Alabama              | None           |  |  |
| Alaska               | None           |  |  |
| Arizona              | None           |  |  |
| Maricopa Cty         | None           |  |  |
| Arkansas             | 1998           | Small Business Revolving Loan Program          | \$2 million  |
| California           | 1972           | CA Pollution Control Financing Authority       | \$6.8 billion in bond sales, with projects ranging from \$10,000 to \$500,000. |
|                      | 1995           | Innovative Clean Air Technologies              | \$1 million/year   |
|                      | 1991           | Air Quality Assistance Fund (loan)*            | No new guarantys in 1998.  |
| South Coast          | 1991           |  |  |
| Colorado             | None           |  |  |
| Connecticut          | 1994           | Financial Assistance for Vapor Recovery (loan) | \$1 million revolving  |
| Delaware             | None           |  |  |
| District of Columbia | None           |  |  |
| Florida              | None*          |  |  |
| Georgia              | None           |  |  |
| Hawaii               | None           |  |  |
| Idaho                | None           |  |  |
| Illinois             | None           |  |  |
| Indiana              | None           |  |  |
| Iowa                 | None           |  |  |
| Kansas               | None           |  |  |



**TABLE E-11  
(Continued)**

| <b>PROGRAM</b> | <b>DATE AVAILABLE</b> | <b>NAME OF GRANT/LOAN</b>  | <b>FUNDING LEVEL</b> |
|----------------|-----------------------|--|----------------------|
| Kentucky       | None                  |  |                      |
| Jefferson Cty  | N/R                   |  |                      |
| Louisiana      | None                  |  |                      |
| Maine          | None                  |  |                      |
| Maryland       | To be determined      | To be determined (loan)  | To be determined     |
| Massachusetts  | None                  |  |                      |
| Michigan       | None                  |  |                      |
| Minnesota      | 7/97                  | Small Business Environmental Improvement Loan Program                              | \$750,000 revolving  |
| Mississippi    | None                  |  |                      |
| Missouri       | None                  |  |                      |
| Montana        | 10/98                 | Small Business and Tribal Energy and Environmental Loan Program                    | \$660,000            |
| Nebraska       | None                  |  |                      |
| Nevada         | None                  |  |                      |
| New Hampshire  | None                  |  |                      |
| New Jersey*    | None                  |  |                      |
| New Mexico     | None                  |  |                      |
|                | 9/97                  | Empire State Development Linked Deposit Program (interest buy-down loan)           | N/R                  |
|                | 11/96                 | Environmental Bond Act (grant)   | \$30 million         |
| New York       | 9/99                  | Environmental Protection Agency Pollution Prevention Incentives for States (grant) | \$285,000            |
| North Carolina | None                  |  |                      |

**TABLE E-11**  
**(Continued)**

| PROGRAM        | DATE AVAILABLE | NAME OF GRANT/LOAN   | FUNDING LEVEL                     |
|----------------|----------------|--|-----------------------------------|
| North Dakota   | None           |  |                                   |
| Ohio           | 7/97           | Small Business Assistance Fund (grant)                           | \$180,000                         |
|                | 1/95           | Ohio Air Quality Development Authority Assisted Financing (loan) | Market demand                     |
| Oklahoma       | None           |  |                                   |
| Oregon         | None           |  |                                   |
| Pennsylvania   | 2/99           | Pollution Prevention/Energy Efficiency (loan)                    | \$2,000,000                       |
| Puerto Rico    | None           |  |                                   |
| Rhode Island   | None           |  |                                   |
| South Carolina | N/R            |  |                                   |
| South Dakota   | Planned        |  |                                   |
| Tennessee      | None           |  |                                   |
| Texas          | None           |  |                                   |
| Utah           | 10/95          | Partnership for Compliance (grant)                               | \$180,000                         |
| Vermont        | None           |  |                                   |
| Virginia       | 7/1/99         | Small Business Environmental Compliance Assistance Fund (loan)   | \$625,000 initially               |
| Virgin Islands | None           |  |                                   |
| Washington     | None           |  |                                   |
| West Virginia  | Mid 98         | WV Small Business Environmental Loan                             | \$450,000 general + \$500,000 UST |
| Wisconsin      | None           |  |                                   |
| Wyoming        | None           |  |                                   |

**TABLE E-11**  
**(Continued)**

**\*Notes:**

- South Coast, CA      The District recently released an RFP seeking a financial assistance consultant or organization to redesign its management of the Air Quality Assistance Fund, a loan guaranty program. The contract will be awarded on or about March 19, 1999.
- FL      Proposed legislation last session, but it did not pass.
- NJ      Inventory of existing funding opportunities planned for 1999.

**TABLE E-12  
COOPERATIVE EFFORTS**

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

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS   |   |   |
|--------------------|--|---|---|
|                    | SBO  | SBAP  | CAP   |
| Alabama            | Organizationally allied with P2 program unit and Section 319 Nonpoint Source unit to allow sharing of resources and personnel.   | N/R   | N/R   |
| Alaska             | Works with the Department of Commerce, SBDC, MEP, and University to reach more small businesses. Participates in regional and national P2 Roundtables. Participates in Governor's Council on Small Business Assistance Programs to eliminate possible duplication of efforts and to have better coordination and referrals between agencies. | Works with the Air Program to ensure that efforts are not duplicated. Works with local businesses to review information that affects them. Works with local associations and other agencies, such as Department of Community and Regional Affairs, Division of Energy, and the Alaska Village Electric Co-op.   | SBO/SBAP uses the CAP to review fact sheets, newsletters, and other Departmental information. CAP members are from all parts of the state. Their names and contact information has been distributed in different ways to allow businesses and concerned citizens to contact CAP members directly regarding Department activities. |
| Arizona            | Information referral network with Small Business Association, AZ Department of Commerce, and various small business industry trade associations. Also work with Maricopa County SBEAP and ADEQ internal program staff to help reach their target audience.   | Same as SBO.  | N/R   |
| Maricopa Cty       | N/R  | Working with Community colleges related to dust control courses -- we had several classes in 1998. Also meeting with Arizona State University to discuss construction/dust issues and how to work together. Planning a coatings/solvents workshop in partnership with the community colleges and the AZ Department of Environmental Quality (tentatively Spring or Summer 1999).<br><br>The AZ Strategic Alliance is a government and industry partnership founded to promote environmental leadership. The Green Building Group is a subcommittee of AZ Strategic Alliance. This committee focuses on environmental issues (waste, recycling, energy) related to construction.<br><br>Small Business Providers is a group made up of various organizations dedicated to assisting small businesses. Members represent SBA, associations, chambers, and ADEQ. | N/R   |
| Arkansas           | Applied research on composting as a remediation method with School of Engineering, University of AR and AR Science and Technology Authority.   | Engineering services through the AR Center for Technology Transfer, University of AR at Fayetteville, and the AR Science and Technology Authority.  | N/R   |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY   | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS   |   |   |
|----------------------|--|---|---|
|                      | SBO  | SBAP  | CAP   |
| California           | Outreach efforts are coordinated with other public agencies, trade associations, chambers of commerce, local government agencies, etc. Outreach ideas and materials are shared with other SBAPs, AWMA, and statewide CA Air Pollution Control Officer's Association.   | A number of local districts assist one day per week at Cal/EPA permit assistance centers. District staff provide counter-top displays in city and local government, business assistance, and permit services areas to refer customers to the districts. Districts larger than 250,000 people assign a single point of contact to assist businesses. | Under construction.   |
| South Coast          | SCAQMD staff is assigned to assist one day per week at Cal/EPA permit assistance centers. Outreach efforts are coordinated with other public agencies, trade associations, chambers of commerce, local government representatives, and agency staff. Outreach ideas and materials are shared with other SBAPs, AWMA, and statewide CA Air Pollution Control Officer's Association. Public Advisor participates with other states in activities coordinated through US EPA's SBO.   | SCAQMD staff is assigned to assist one day per week at Cal/EPA permit assistance centers. AQMD provides counter-top displays in city and local government, business assistance, and permit service areas to refer customers to AWMD's toll free line.   | The Local Government & Small Business Committee involved the State Air Resources Board (CARB) and US EPA Ombudsman in decisions such as compliance assistance, SBREFA, and BACT/LAER issues.  |
| Colorado             | Works with the CO Revolving Loan Program so that SBO has a small business loan resource. Work with SBA and its various loan resources for the same reason. Meets periodically with the local county environmental agencies and Chamber of Commerce groups. Partnering with the SBDCs to deliver compliance workshops. Referral exchanges with the OSHA consultation service. Partnering with our Environmental Customer Assistance Center to address multimedia environmental compliance.  | Periodically meets with the local county environmental agencies regarding compliance assistance outreach. Works closely with industry trade associations to provide better compliance assistance. Works with EPA Region 8 to create and distribute outreach materials for small business.   | Meets with SBAP quarterly and also participates on quarterly conference calls. Attends national CAP training with CAP members at large.   |
| Connecticut          | CT's SBO and SBAP are merged and collectively the program leverages technical staff from within the Department to provide compliance assistance. The SBO position is designated out of the Office of the Commissioner to enhance the multimedia capabilities of the SBAP. Additional resources are leveraged through partnerships with trade associations, quasi-public agencies, other state agencies, public utilities, local chambers of commerce, and programs established at CT universities. The SBAP has established effective partnerships with trade associations and vendors representing the auto body industry, the metal finishing industry, and the gasoline industry. |   | CT's CAP consists of ten members. Other interested individuals attend meetings regularly and serve as non-voting members. The CAP has helped to establish relationships with the small business community and has helped to publicize the availability of the SBAP. |
| Delaware             | Attempts to partner with anyone who can be of assistance at the state or federal level.  | SBO has a dual role as SBAP.  | N/R   |
| District of Columbia | N/R  | To reach more businesses, the inspectors distribute brochures when they go out on inspection. The SBAP name and number are stamped so that if they have any questions after the inspection, they can call for confidential advice.  | N/R   |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS   |   |   |
|--------------------|--|---|---|
|                    | SBO  | SBAP  | CAP   |
| Florida            | In FL, SBO/SBAP functions are combined. We have partnered with our permitting staff, district staff, and local program staff to enhance from within the agency. We have partnered with the Small Business Development Centers and the FL Manufacturing Technology Centers to enhance assistance and availability.                                      |   | We have partnered with specific trade associations to enhance relationships with specific industries (e.g., as part of a six member partnership, we developed materials for a series of statewide workshops for the printing industry).                         |
| Georgia            | SBO has a gentleman's agreement with the Hazardous Waste Program on providing multimedia technical assistance to dry cleaners.   | N/R   | N/R   |
| Hawaii             | Small Business and Trade Association Advocacy Focus Groups, dry cleaning technical assistance workshops.   | Dry cleaning technical assistance workshops, ad hoc Clean Air Branch rulemaking advisory committee.   | N/A   |
| Idaho              | Working with the different regulatory divisions (including air and hazardous waste) within the agency has produced a high level of cooperation. Also, have worked with the small business administration and small business development centers, particularly TECHelp. Monthly meetings with air staff, who represent the SBAP portion of the program. | Monthly meetings with the SBO.  | N/R   |
| Illinois           | SBO has access to 1,200 employees of the IEPA for their expertise.   | Being a part of the IL Small Business Development Center Network, we have access to small businesses through 53 centers across the state. In addition, we have established working relationships with many business groups including NFIB, Printing Industry of IL, State Fabricare Association, State Chamber of Commerce, Manufacturers Association, Automotive Wholesalers, and local economic development organizations. We work very closely with the Waste Management Research Center, IEPA Bureau of Air and Office of Pollution Prevention. | N/R   |
| Indiana            | N/R  | SBAP maintains regular contact with other offices within IDEM. SBAP borrows information from and shares information with other states' SBAP programs.   | SBAP submits annual confidentiality reports to the CAP. SBAP provides CAP with regular updates as to our initiatives, including providing the CAP with a copy of this SBTCP report. CAP provides quarterly guidance as to areas on which the SBAP should focus. |
| Iowa               | Working with and submitting newsletter articles to associations of targeted industries, IA Department of Natural Resources, Center for Industrial Research and Services, and IA Manufacturing Technology Center.   | IAEAP uses part time and full time student assistants and interns from the University of Northern Iowa to help with client assistance and other program activities. As needed, staff from IWRC (in addition to the 5.0 FTE for IAEAP) are used from time to time.   | N/R   |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS   |   |   |
|--------------------|--|---|---|
|                    | SBO  | SBAP  | CAP   |
| Kansas             | SBO has organized a group of state/federal agency staff who work with businesses to facilitate better referrals and understanding of available services. SBO works extensively with regulatory bureaus and university technical assistance programs.   | Technical assistance program works with MAMTC, PETE, and other P2/technical assistance programs to facilitate coordination and cooperation. SBAP is working with local county department programs, such as the P2 Alliance in Wichita, KS.  | CAP works with the SBO and SBAP through meetings and telephone contacts.  |
| Kentucky           | Air Quality Representative for Small Business (AQRSB) writes a column for distribution 6 times per year and responds to requests for technical assistance. Division for Air Quality (DAQ) has designated several people to assist AQRSB in completing requests and drafting columns for state newsletters. AQRSB worked with KBEAP, DAQ, and other state business associations to promote and present 112(r) seminars across the state in November 1998. | Joint outreach efforts with KY Pollution Prevention Center, KY Small Business Development Centers, and the Division for Air Quality. Joint visits /P2, economic development, and other assistance providers.  | CAP members have assisted the AQRSB and KBEAP in working with organizations that the members represent. A legislative member created a team that included a legislative analyst, the AQRSB, and a Cabinet attorney to draft legislation to add more small business owners to the Panel. The economic development representative scheduled a presentation by the KBEAP to field office representatives from the Panel member's agency. |
| Jefferson County   | N/R  | N/R   | N/R   |
| Louisiana          | N/A  | SCORE, Air Toxics Permit Section, trade associations, technical program support.  | Trade associations, environmental leadership.   |
| Maine              | SBO works closely with SBTAP and other business providers, such as the ME Department of Economic and Community Development, ME Chamber and Business Alliance, ME Small Business Development Centers, Manufacturing Extension Partnership, ME Metal Products Association, ME Wood Products Association, and other business groups to maximize its effectiveness.  | SBTAP works with staff from the Department's Office of Innovation and Assistance and other bureaus to assist in some function of the program. The SBTAP also works with the SBO and other business service providers such as the ME Department of Economic and Community Development, ME Chamber and Business Alliance, ME Small Business Development Centers, Manufacturing Extension Partnership, ME Metal Products Association, ME Wood Products Association, and other business groups to maximize its effectiveness. | The CAP is a joint panel comprised of 16 members. Functions of SBTAP oversight were merged with an existing panel charged with overseeing the Toxics Use Reduction Program.   |
| Maryland           | N/R  | SBAP works with the other administrations to reach small businesses. ARMA has two engineers who provide permitting services to small businesses. SBAP works closely with the P2 program on outreach activities. Input from other administrations is used to determine sectors to target for assistance.   | N/R   |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS  |   |  |
|--------------------|---|---|--|
|                    | SBO   | SBAP  | CAP  |
| Massachusetts      | N/R   | OTA works with the enforcement agencies to ensure that its compliance advice is accurate, to provide general information about trends we see in the field, to assist in incorporating P2 into enforcement, to include regulatory updates in our public events, and to coordinate outreach. OTA co-sponsors its events with appropriate trade associations and environmental agencies. For example, auto body Crash Course was a joint project of a trade association, individual shop owners, and four agencies. The DPW project was conducted with EPA. OTA has assisted in the formation of a multiagency task force on Environmental, Health, and Safety issues in schools. The enforcing agencies refer violators to OTA. OTA and Manufacturing Partnership refer to each other. OTA and Central Mass Manufacturing Partnership have formed a Business Environmental Network. | N/R  |
| Michigan           | SBO works closely with the company referrals made by the staff of the MI Jobs Commission, who are assigned to make initial contacts with the state's business and industry for purpose of economic development expansion and retention.                                     | SBAP has developed a pattern of working closely and seeking consultation from not only the regulatory air quality agency, but also other multimedia divisions and units of the regulatory agency, business and industry associations, SBAP counterparts in EPA Region V, as well as other state agencies when developing and implementing its outreach efforts (e.g., statewide workshops and fact sheet/guidebook development).  | Works closely with the SBO and SBAP.   |
| Minnesota          | SBO is an active member on the MN Ombudsman Roundtable, a peer networking group consisting of all MN State Ombudsman Offices. SBO also coordinates with SBDCs and other financial assistance providers to market the Small Business Environmental Improvement Loan Program. | SBAP partners with the MN Technical Assistance Program to promote P2 activities, the SBDCs to coordinate environmental compliance service delivery, the MN Emergency Response Commission to coordinate RMP and 112(r) technical assistance, Worksafe MN to promote worker safety, and internal agency groups to represent small business concerns during agency activities including rulemaking and permitting.   | CAP currently is dormant pending reassignment by a newly elected administration.   |
| Mississippi        | Cooperates with regulatory programs, P2, trade associations, and public organizations.  | Same as SBO.  | Same as SBO.   |
| Missouri           | Greg Johnston was just appointed as the new ombudsman. SBAP has met with him to brief him of his responsibilities and the SBAP program in general. The SBAP supplies technical assistance, as needed, to the SBO.   | SBAP works closely with the CAP, supplying information as required to the CAP. SBAP works with the department's regulatory programs to obtain expertise in specific areas when needed. SBAP also partners with the Small Business Development Centers and other assistance providers to reach MO's businesses.  | CAP is supported by the SBAP and is looking at ways to assist businesses by hearing their problems and making recommendations to the regulatory agencies and by giving the SBAP direction as to the best methods to assist businesses. |



**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS  |  |  |
|--------------------|---|--|--|
|                    | SBO   | SBAP   | CAP  |
| Montana            | SBO/SBAP buy down interest rates offered by the MT Department of Commerce's Microbusiness Finance Program's loan program. SBO/SBAP approves all prospective projects and provides technical assistance to 13 loan officers around MT.   | SBO/SBAP work with the MT State University Pollution Prevention Program on several cooperative projects, including Peaks to Prairies P2 Information Center, ECOSTAR Environmental Awards Program (with US Small Business Administration), STAR Program (spray coating technique training), and the Pollution Prevention Partnership (with MT industries).  | N/R  |
| Nebraska           | The SBO and SBAP person are the same person. Cooperative effort is not an issue.  | N/R  | N/R  |
| Nevada             | SBO utilizes BAQ and other agency files to obtain information regarding issues that the ombudsman is investigating. SBO interviews staff with knowledge of a facility, as well as facility personnel, to establish a complete picture of an issue to determine solutions. SBO interfaces with various business organizations by attending monthly meetings and networking with business professionals.                                    | SBAP utilizes the expertise of NDEP staff in various environmental programs for technical information. SBAP works closely with the SBDC to provide information and technical assistance to the business community and to coordinate dissemination of outreach materials and workshops. SBAP works closely with the county air pollution control programs for hands-on education of the various sources, identification of industry needs, and outreach activities. The NDEP Bureau of Air Quality provides direct assistance to businesses regarding permitting and compliance. Workshops are conducted as changes in federal and state regulations warrant. | CAP utilizes the information SBO and SBAP collect to determine needs within business community and identify methods to support and assist small businesses. CAP members network with representatives from their individual areas of business and bring concerns before the SBO and SBAP. Issues are identified and recommendations to the agency are made. |
| Washoe Co. AQMP    | Air Quality permitting and enforcement staff provide assistance for small business in completing permits, monitoring, and compliance. Staff work cooperatively with the SBO regarding program development and mutual outreach activities. Staff work closely with local business development centers and often meet with prospective NV businesses to identify environmental permits for the business should it locate within the county. |  |  |
| Clark Co. AQP      | Air Quality program staff utilize direct mailings to affected businesses, Internet postings, workshops, public speaking, and various outreach materials such as brochures and information packets. Permitting and enforcement personnel assist small businesses to comply with permitting, monitoring, and operation. Assistance also is given for P2 when appropriate.   |  |  |
| New Hampshire      | Administrative support from Air Resources Division. Continue working relationship with other advocates for energy, environmental, legislative, and business issues.   | On-going relationship with DES Pollution Prevention Program and other compliance assurance groups within and outside the DES organization. Continue to develop cooperative ventures with trade associations, the university system, and other technical assistance providers.  | Administrative assistance from Air Resource Division.  |
| New Jersey         | Interagency agreement between NJ Commerce and NJ DEP for administration of the SBO responsibilities through NJ Commerce.  | SBAP acts as staff to the CAP. SBAP coordinates with Air Permit, Air Planning, and P2 within DEP. Coordinates with the NJ Institute of Technology's Technical Assistance Program for P2. SBAP and SBO work with business and trade associations and the Small Business Development Centers.  | CAP met with seven trade associations as part of their regular meetings. The trade associations were invited to offer their concerns with state and federal regulations and areas in need of improvement.  |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS   |  |  |
|--------------------|--|--|--|
|                    | SBO  | SBAP   | CAP  |
| New Mexico         | SBO provides advocacy and referral services upon request by the SBAP, the CAP, or clients. These services have included small and large group meeting facilitation (regulated entities, environmental groups, citizen groups, etc.), public input and informational meetings, and interventions on an individual level. Technical assistance, once determined, then is provided by various programs within the Environmental Department, including the SBAP.   | Other agencies, such as Economic Development, Small Business Development Centers, Chambers of Commerce, and local environmental field offices, help with SBAP outreach. SBAP also networks with other bureaus to develop multimedia environmental management tools, workshops, and presentations for the printing, automotive, and manufacturing industries. An example of our networking is the P2 effort with the New Mexico Green Zia Program.  | Legal assistance to the CAP is being provided by the NM Assistant Attorney General's Office. CAP member reviewed draft template of rock crusher/asphalt regulations. |
| New York           | SBEO routinely cosponsors workshops and conferences with the SBAP, the DEC, and trade associations. SBEO also routinely works with the New York City Department of Environmental Protection's Environmental Economic Development Assistance Unit (EEDAU) to reach out and assist businesses in New York City. In 1998, under a grant from the US EPA, the SBEO partnered with the SBAP, EEDAU, the Empire State Development Corporation, Environmental Business Association, and the dry cleaning trade associations to produce a P2 program aimed at exploring the alternatives to perchloroethylene dry cleaning equipment.  | SBAP cosponsors technical workshops with other providers of technical assistance, including local agencies, trade groups and associations, and DEC's Pollution Prevention Unit to leverage outreach to industry sectors and to avoid duplication of effort. In addition, the SBAP utilizes DEC's technical staff to review technical fact sheets and articles for the SBAP's technical newsletter. SBAP also regularly invites equipment vendors and representatives from companies that develop technologies to provide in-house technical workshops for staff. SBAP always invites DEC's technical staff and other representatives of state agencies to these workshops so they might share the learning experience. | N/R  |
| North Carolina     | NC Air Quality Division and the Division of Pollution Prevention and Environmental Assistance (DPPEA) have provided technical support and helped jointly to develop workshops for specific business sectors. The air, water, and hazardous waste regulatory programs and DPPEA have assigned a senior permit writer to the Ombudsman's Office to staff the Environmental Permit Center, a multimedia permit center.<br><br>The Ombudsman also is a participant on the Governor's Small Business Council. This involves Cabinet level participation from most state agencies and includes small business representatives. The Council is chaired by the Lt. Governor and staffed by the Small Business Technology and Development Center. The Council recently won a national award for its efforts to communicate to small businesses. | N/R  | N/R  |
| North Dakota       | The ombudsman makes referrals to the SBDCs in the state, and they reciprocate.   | SBAP works with trade associations, other state agencies, and other organizations to get information to affected businesses.   | N/R  |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS  |  |   |
|--------------------|---|--|---|
|                    | SBO   | SBAP   | CAP   |
| Ohio               | <p>The SBO, located in a nonregulatory agency, works closely with the SBAP and "piggybacks" on its efforts, including those described under SBAP. SBO has reached out to various trade associations including the Printing Industry of OH, the Automotive Services Association of OH, the state's 330 local Chambers of Commerce, the OH Bakers Association, the OH Bar Association, and the OH Bankers Association. During 1998, we contacted each of OH's SBDCs and have met with many of them.</p> | <p>SBAP is located in the OEPA Division of Air Pollution Control headquarters, allowing direct access to permitting, inspection, enforcement, and policy development questions. This has helped to resolve many site-specific permitting issues. To stay informed, the SBAP also has joined several workgroups within the Air Pollution Division, which develop Agency permitting policies and coordinate NESHAP, 112(r), and non-Title V fee system outreach and enforcement activities.</p> <p>SBAP has used OEPA's Public Interest Center to promote the SBAP through agency newsletters and to develop fact sheet layout and graphics.</p> <p>SBAP uses five district offices and nine local air agencies to help distribute SBAP literature and to refer companies to the SBAP. SBAP also has direct e-mail access to district office staff through a LAN network. SBAP has invested much time and effort building positive relationships with the district offices and has noticed an increase in the number of companies they refer to the SBAP, many after routine inspections or complaint investigations.</p> <p>SBAP has established mutual referrals with the OSHA on-site consultation programs offered through the OH Bureau of Employment Services and the OH Bureau of Workers Compensation to help businesses bridge the gap between OSHA and EPA concerns.</p> <p>OEPA has established a pilot program for multimedia small business assistance, which covers the 10-county Central OH District and is funded through a special appropriations bill. SBAP has coordinated several multimedia site visits with this program and regularly refers non-air questions to them. They, in turn, refer air questions to us. This program also has developed a newsletter to which the SBAP is a regular contributor for air articles (4 during 1998). They have formed an advisory group modeled after the CAP and regularly attend CAP meetings. This initial two-year program received additional funding to operate in 1999, but future funding is uncertain at this time.</p> | N/R   |
| Oklahoma           | <p>Work together to represent small business issues, particularly with respect to rulemaking and rule reform within the agency among the regulatory divisions.</p>  | <p>SBAP is the lead group providing assistance to and representing the small businesses in OK. They work closely with the other components listed here.</p>  | <p>CAP has become quite active in evaluating new and existing state air rules and their impact on small businesses in OK. They work closely with the SBAP staff to accomplish this.</p> |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS  |   |   |
|--------------------|---|---|---|
|                    | SBO   | SBAP  | CAP   |
| Oregon             | N/R   | <p>BAP brochures were mailed to all chambers of commerce, economic development departments, planning departments, and many trade associations in OR. Calls have been received from people receiving these brochures, and speaking engagements were arranged.</p> <p>Joint projects with the OR Economic Development Department have been fairly successful.</p> <p>BAP has been working with the DEQ's Divisions of Hazardous and Solid Waste, Water Quality, and Pollution Prevention Team.</p> <p>BAP also is working with the Portland Pollution Prevention Outreach Team, consisting of local environmental regulatory agencies. This team is working on a green stick project for the automotive industry.</p> | CAP worked with the SBDCs at the community colleges to sponsor generic P2 workshops. This effort was not successful, and the CAP is continuing to work with the SBDCs to improve this outreach. |
| Pennsylvania       | SBO draws upon the expertise and assistance of all PA DEP's regional and central office staff.  | SBAP has received cooperation from trade associations and district libraries in delivering its services. SBAP is a member of the PA Environmental Assistance Network, which allows it to draw on the expertise of all of the consortium members.  | PA DEP provides administrative support to the CAP, whose meetings are held at the department's central office building.   |
| Puerto Rico        | Commercial Development Administration Regional Managers were instructed on the SBTCP basics for referral to SBAP.   | Inside the state environmental regulatory agency, referrals are made to SBTAP to assist businesses on environmental requirements.   | N/R   |
| Rhode Island       | SBO is funded entirely from state revenues not associated with CAA.   | SBAP (2 FTEs) integrated into Department's existing P2 program housed in the Office of Technical & Customer Assistance. 0.5 FTE (University of RI research associate) providing technical support to FTEs.  | N/A   |
| South Carolina     | SBO provides multimedia assistance using resources in other program areas. Program is involved in Environmental Network Partnership, which includes representatives from other providers, such as SBDCs, Center for Waste Minimization, Center for Environmental Policy at the University of SC, MEP-sponsored programs, etc. Also involved in a new Environmental, Health & Safety Association that includes OSHA representatives. | Program has regular access to technical staff in Bureau of Air Quality to assist on permitting issues. Air Quality also provides computer dispersion modeling at no charge to eligible small businesses.  | SBO serves as secretariat to CAP.   |
| South Dakota       | SBO is multimedia and works with all programs within the department.  | There is good cooperation between programs.   | N/R   |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS   |  |   |
|--------------------|--|--|---|
|                    | SBO  | SBAP   | CAP   |
| Tennessee          | SBO has access to other needed departmental resources to assist SBAP function when needed necessary.   | <p>Reorganization of program allows access to county and municipal technical assistance agencies, a training facility, and inclusion of program information in educational material dissemination.</p> <p>Partnerships have been developed with the state energy office, TVA, and SBDCs.</p> <p>The program is a member of the department's P2 Partnership that could assist in reducing the regulatory burden for small businesses.</p>   | Not operating.  |
| Texas              | <p>Small Business Advisory Committees (5 committees with 96 members) serve as a link between the SBAP and the small businesses in their area.</p> <p>The EnviroMentor Program provides free on-site environmental compliance assistance to small businesses.</p> <p>Work with trade associations to sponsor workshops and distribute literature to small businesses.</p> <p>Work with TX Manufacturing Assistance Centers to deliver on-site assistance to small businesses and to ensure that whatever service provider a small business contacts, they get the appropriate help. Developed directory of service providers to small business.</p> <p>Work with SBDCs to develop videos, sponsor workshops, and conduct on-site visits for small businesses.</p> |  | Diverse membership from around the state, including contacts with several primary trade associations. |
| Utah               | SBO and SBAP meet about every other week. They send e-mail with questions and have developed a cooperative working relationship. SBO and SBAP meet with the Small Business Work Group to coordinate multimedia in the Department.  | SBAP works with the Department's P2 Program. SBAP refers companies to Water Quality and Solid/Hazardous Waste.   | SBO/SBAP and CAP meet about every other month. Information is faxed and e-mailed as necessary.        |
| Vermont            | N/A  | Partnering with Central VT Solid Waste District. Working with VT Environmental Assistance Partnership, which includes VT Small Business Development Center, VT Manufacturing Extension Center, VT Economic Development Center, and SBAP. Sitting on our Department's internal Inspection, Compliance and Enforcement Team to help incorporate SBAP into regulatory programs. Referrals of business with problems made by our regulatory programs. Working with EPA on initiatives. | Attending all meetings. Discussing up-coming projects and getting feedback, etc.                      |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS   |  |   |
|--------------------|--|--|---|
|                    | SBO  | SBAP   | CAP   |
| Virginia           | Utilization of national air program contacts, where appropriate.   | <p>On behalf of the SBO and the CAP, the SBAP actively tries to utilize the contacts and credibility of the following organizations: VA Small Business Development Center Network, VA Manufacturing Technology Center, the A.L. Philpott Manufacturing Extension Partnership, and VA Chamber of Commerce.</p> <p>SBAP actively solicits input and partnerships with individual trade organizations to assist in getting information into the hands of their constituents. Organizations include Mid-Atlantic Cleaners and Launderers Association, Greater Washington Korean Dry Cleaner Association, VA chapter of the National Federation of Independent Businesses, VA Propane Gas Association, VA Chamber of Commerce, etc.</p> | CAP has held one trade association roundtable for issue identification and program marketing and plans on conducting similar events in the future.  |
| Virgin Islands     | Dual role SBO/SBTAP.   |  | Not yet named.  |
| Washington         | N/R  | Combined effort between Ecology and seven local air quality authorities. Cooperative efforts among various Ecology departments (i.e., media).  | N/R   |
| West Virginia      | SBO works closely with SBAP personnel to evaluate technical aspects of small business issues. DEP personnel outside the air office are available for consultation. Resources outside the agency are consulted on specialty projects, generally at no cost or exchanged for in-kind services. | SBAP works with other air quality staff, when necessary, to evaluate permit and Title V applicability for small businesses. A significant number of clients are referred to the SBAP through agency enforcement activities. Other DEP staff, especially P2 Services, are available to help coordinate assistance to small businesses. SBAP also is coordinating its efforts with other outside assistance groups, including academic and SBDC efforts. Trade organizations and OSHA contacts provide additional assistance.  | All members serve on a volunteer basis.   |
| Wisconsin          | Numerous public and private sector experts are called upon as needed to provide assistance to the SBO. Experts from the areas of development finance, permit assistance, law, and environmental compliance/safety have provided suggestions and guidance.                                    | Periodically, DNR personnel provide technical review of publications and partner is the development of seminars and workshops. These individuals review documents for completeness and accuracy, help formulate outreach strategy, and suggest work plans. SBAP members also provide guidance to and receive guidance from P2 and Solid & Hazardous Waste Education Center personnel on outreach and publications. SBAP staff consult with trade associations and other private and public sector professionals as appropriate.  | Personnel from SBAP coordinate meeting locations, develop agenda topics and organize the bi-monthly CAP meetings. Other individuals from the WI DNR, EPA Region V, WI Department of Commerce, and the University of WI Solid & Hazardous Waste Education Center advise the CAP on an as needed basis. |

**TABLE E-12  
(Continued)**

| STATE OR TERRITORY | BRIEF DESCRIPTION OF COOPERATIVE EFFORTS   |  |  |
|--------------------|--|--|--|
|                    | SBO  | SBAP   | CAP  |
| Wyoming            | <p>Since the formation of the Outreach Office in July 1997, cooperation between the SBO and the regulatory programs of our Department has continued to evolve. Responses to inquiries and coordination between the Office and regulatory programs in the Air, Land, Water, Solid and Hazardous Waste, Abandoned Mine Land Reclamation, and Industrial Siting Divisions now are solicited and published routinely in our newsletter. Technical assistance is provided regularly by the regulatory staff in response to questions generated during outreach visits. Additional coordination also is occurring with our counterparts in other states and on the national level through established SBO/SBAP channels.</p> | <p>SBAP continued as the secretariat for the CAP, providing administrative and logistical support. On numerous occasions, the SBAP developed NSR permit applications for signature by small businesses and coordinated this activity with the Air Quality Division. Working with other DEQ Divisions, the SBAP coordinated the development of the Office's environmental checklists for the medical industry, wood manufacturers, and printers. Also, the SBAP coordinated EPA's 112(r) training activities through the WY Emergency Management Agency and the SERC. SBAP provided MWI presentations to the WY Hospital Association and coordinated CAP issues with NFIB. As site coordinator for the APDLN and other educational broadcasts, the SBAP coordinates satellite training sessions and workshops for regulatory personnel and the public. As a member of the planning committee and technical subcommittee for the National SBO/SBAP conference, the SBAP provides moderators and speakers for the upcoming concurrent sessions. SBAP provided input to WESTAR, EPA, and other SBAPs regarding WY's activities and issues.</p> | <p>Through its advisory capacity, the CAP recommended to the Department the adoption of its multimedia "Small Business Voluntary Disclosure and Incentive Rule" and a Confidentiality Policy for the office staff. CAP ensured that its activities were forwarded to the NFIB. Also, the CAP concurred with the SBO/SBAP communications activities with EPA, other SBAPs, trade associations, and economic assistance organizations.</p> |

**TABLE E-13**  
**SUMMARY: SBAP MECHANISMS FOR AVOIDING DUPLICATION AMONG SBTCPs**

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

N/A Not applicable    N/R No response



**TABLE E-13**  
**(Continued)**

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

N/A Not applicable    N/R No response

**TABLE E-13  
(Continued)**

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

N/A Not applicable    N/R No response

**TABLE E-13  
(Continued)**

**\*Other**

|                 |  |
|-----------------|--|
| AK              | Developing service delivery plan with AK SBDC.   |
| South Coast, CA | Subscribe to Printing Industry & Pollution Prevention listserve.   |
| CT              | Participate in the development of a coordinated network of environmental assistance providers.   |
| ID              | Subscribe to non-SBO listservers.  |
| IL              | Greater Chicago P2 Project of state, county, city, and business groups.  |
| IN              | Networking with specific industry or chemical groups, such as the Region V Mercury Workgroup.  |
| KS              | Participation in National P2 Roundtable and the Region VII P2 Roundtable.  |
| KY              | Serve as Team Leader of a national work group on performance measurements.   |
| MN              | Attend regional and national conferences.  |
| NC              | NC SBO is part of a Small Business Partnership Group, which includes SBDCs, universities, and other assistance providers. The purpose of this group is to coordinate activities and avoid duplication. |
| ND              | Subscribe to several other states' newsletters.  |
| RI              | SBAP annual New England meeting.   |
| VA              | Use of the SBO/SBAP National Steering Committee. P2 Roundtable.  |

**TABLE E-14**  
**SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS**  
**OF THE PAPERWORK REDUCTION ACT**

| <b>Program</b> | <b>Routine review of SBTCP information collection activities</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Receiving / providing information electronically</b> | <b>Simplified / consolidated permits and/or forms</b> | <b>Eliminating unnecessary permits by increasing exemptions</b> | <b>General permits for certain types of industries</b> | <b>Other (See below)</b> |
|----------------|--|---|---|---|---|--|--------------------------|
| AL             | N/R  |   |   |   |   |  |                          |
| AK             | x  | x   | x   |   | x   | x  |                          |
| AZ             | x  | x   | x   |   |   | x  |                          |
| Maricopa       |  |   | x   | x   |   |  |                          |
| AR             |  |   | x   | x   |   |  |                          |
| CA             |  |   | x   | x   | x   |  |                          |
| South Coast    |  |   | x   | x   | x   | x  |                          |
| CO             |  | x   | x   | x   |   | x  |                          |
| CT             | x  | x   | x   | x   | x   | x  | x                        |
| DE             | N/R  |   |   |   |   |  |                          |
| DC             |  |   |   | x   |   |  | x                        |
| FL             |  |   |   | x   | x   | x  | x                        |
| GA             | x  | x   | x   | x   |   | x  |                          |
| HI             | x  | x   | x   | x   | x   | x  |                          |
| ID             | x  | x   | x   |   |   | x  |                          |
| IL             | N/A  |   |   |   |   |  |                          |
| IN             | x  | x   | x   | x   | x   | x  |                          |

N/A Not applicable    N/R No response

**TABLE E-14  
(Continued)**

| <b>Program</b> | <b>Routine review of SBTCP information collection activities</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Receiving / providing information electronically</b> | <b>Simplified / consolidated permits and/or forms</b> | <b>Eliminating unnecessary permits by increasing exemptions</b> | <b>General permits for certain types of industries</b> | <b>Other (See below)</b> |
|----------------|--|---|---|---|---|--|--------------------------|
| IA             | x  | x   | x   | x   | x   | x  |                          |
| KS             | x  | x   | x   | x   |   | x  |                          |
| KY             | x  | x   | x   |   | x   | x  |                          |
| Jefferson      | N/R  |   |   |   |   |  |                          |
| LA             | x  | x   | x   | x   | x   | x  |                          |
| ME             |  | x   |   |   |   |  |                          |
| MD             |  |   | x   |   |   |  |                          |
| MA             |  | x   | x   | x*  | x   |  |                          |
| MI             | N/A  |   |   |   |   |  |                          |
| MN             | x  | x   | x   | x   | x   | x  | x                        |
| MS             | x  |   |   |   | x   |  |                          |
| MO             | x  | x   | x   | x   | x   | x  |                          |
| MT             | x  | x   | x   | x   | x   |  |                          |
| NE             | x  | x   |   |   | x   | x  |                          |
| NV             | x  | x   | x   |   |   | x  |                          |
| NH             | x  | x   | x   | x   | x   | x  |                          |
| NJ             | x  | x   | x   | x   | x   | x  |                          |
| NM             |  | x   | x   | x   | x   | x  |                          |

N/A Not applicable    N/R No response

**TABLE E-14  
(Continued)**

| <b>Program</b> | <b>Routine review of SBTCP information collection activities</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Receiving / providing information electronically</b> | <b>Simplified / consolidated permits and/or forms</b> | <b>Eliminating unnecessary permits by increasing exemptions</b> | <b>General permits for certain types of industries</b> | <b>Other (See below)</b> |
|----------------|--|---|---|---|---|--|--------------------------|
| NY             |  | x   | x   | x   |   |  |                          |
| NC             | x  | x   | x   | x   | x   | x  |                          |
| ND             | x  | x   | x   | x   | x   | x  |                          |
| OH             |  | x   |   |   |   |  |                          |
| OK             | x  |   | x   | x   | x   | x  |                          |
| OR             | x  | x   | x   | x   | x   | x  |                          |
| PA             |  |   | x   | x   |   | x  |                          |
| PR             | N/R  |   |   |   |   |  |                          |
| RI             | x  | x   |   |   |   |  |                          |
| SC             |  | x   | x   |   |   | x  |                          |
| SD             |  | x   | x   | x   |   | x  |                          |
| TN             | x  | x   | x   | x   | x   | x  |                          |
| TX             | x  | x   | x   | x   | x   | x  | x                        |
| UT             | x  | x   | x   | x   | x   | x  |                          |
| VT             | x  | x   | x   |   |   |  |                          |
| VA             | x  | x   | x   | x   | x   | x  |                          |
| VI             | x  | x   | x   | x   |   | x  |                          |
| WA             | x  | x   |   | x   | x   |  |                          |

N/A Not applicable    N/R No response

**TABLE E-14  
(Continued)**

| <b>Program</b> | <b>Routine review of SBTCP information collection activities</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Receiving / providing information electronically</b> | <b>Simplified / consolidated permits and/or forms</b> | <b>Eliminating unnecessary permits by increasing exemptions</b> | <b>General permits for certain types of industries</b> | <b>Other (See below)</b> |
|----------------|--|---|---|---|---|--|--------------------------|
| WV             | x  | x   | x   |   | x   | x  |                          |
| WI             | x  | x   | x   | x   | x   | x  |                          |
| WY             |  |   | x   |   |   |  |                          |

**\*Other Actions and Notes:**

- DC     Electronic filing of permits.
- FL     General permits for dry cleaners. Other -- Review materials during annual state CAP meeting. Our CAP is, at present, somewhat dysfunctional. We are trying to revitalize it.
- MA     Autobody Crash Course is a regulatory simplification and clarification. P2 worksheet for DEP's ERP program. Currently working on clarification of rules for schools.
- MN     Continued efforts to reduce recordkeeping requirements.
- TX     Concise, easy to read summary documents.

**TABLE E-15**  
**SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS**  
**OF THE REGULATORY FLEXIBILITY ACT**

| Program     | Ensure that small businesses can participate in rulemaking | Periodic rule review for impact on small businesses | Routine review of SBTCP documents for compliance | Amnesty program | Other (See below) |
|-------------|--|---|--|-----------------|-------------------|
| AL          | N/R  |   |  |                 |                   |
| AK          | x  |   | x  |                 |                   |
| AZ          | x  |   | x  | x               |                   |
| Maricopa    | x  |   |  | x               |                   |
| AR          |  |   | x  | x               |                   |
| CA          | x  |   |  | x               |                   |
| South Coast | x  | x   |  | x               |                   |
| CO          |  |   | x  |                 |                   |
| CT          | x  | x   | x  |                 |                   |
| DE          | x  | x   |  |                 |                   |
| DC          | N/R  |   |  |                 |                   |
| FL          | x  |   | x  |                 |                   |
| GA          | x  | x   | x  |                 |                   |
| HI          | x  | x   | x  |                 |                   |
| ID          | x  |   | x  |                 |                   |
| IL          | N/A  |   |  |                 |                   |
| IN          | x  | x   | x  |                 | x                 |
| IA          | x  | x   |  | x               |                   |
| KS          |  | x   | x  |                 | x                 |

N/A Not applicable    N/R No response



**TABLE E-15**  
**(Continued)**

| <b>Program</b> | <b>Ensure that small businesses can participate in rulemaking</b> | <b>Periodic rule review for impact on small businesses</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Amnesty program</b> | <b>Other (See below)</b> |
|----------------|---|--|---|------------------------|--------------------------|
| KY             | x   |  | x   |                        |                          |
| Jeff Cty       | N/R   |  |   |                        |                          |
| LA             | x   | x  | x   | x                      |                          |
| ME             | x   |  | x   | x                      |                          |
| MD             | N/R   |  |   |                        |                          |
| MA             | x   | x  | x   | x                      |                          |
| MI             | N/A   |  |   |                        |                          |
| MN             | x   | x  | x   | x                      | x                        |
| MS             |   | x  | x   | x                      |                          |
| MO             | x   | x  | x   |                        | x                        |
| MT             | x   | x  | x   | x                      |                          |
| NE             | x   |  | x   |                        |                          |
| NV             | x   | x  | x   | x                      |                          |
| NH             | x   | x  | x   | x*                     |                          |
| NJ             | x   | x  | x   |                        |                          |
| NM             | x   |  | x   |                        |                          |
| NY             | x   |  |   | x                      |                          |
| NC             | x   | x  | x   |                        |                          |
| ND             | x   | x  | x   | x                      |                          |

N/A Not applicable    N/R No response

**TABLE E-15**  
**(Continued)**

| <b>Program</b> | <b>Ensure that small businesses can participate in rulemaking</b> | <b>Periodic rule review for impact on small businesses</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Amnesty program</b> | <b>Other (See below)</b> |
|----------------|---|--|---|------------------------|--------------------------|
| OH             |   |  | x   |                        |                          |
| OK             | x   | x  |   | x                      |                          |
| OR             | x   | x  | x   | x                      |                          |
| PA             | x   |  |   |                        |                          |
| PR             | N/R   |  |   |                        |                          |
| RI             |   |  | x   | x                      |                          |
| SC             |   |  | x   | x                      |                          |
| SD             | x   | x  | x   |                        |                          |
| TN             | x   | x  | x   |                        | x                        |
| TX             | x   | x  | x   | x                      |                          |
| UT             | x   |  | x   |                        |                          |
| VT             | x   | x  | x   |                        | x                        |
| VA             | x   | x  | x   |                        |                          |
| VI             | x   | x  | x   |                        |                          |
| WA             | x   | x  | x   |                        |                          |
| WV             | x   |  |   | x                      |                          |
| WI             | x   | x  | x   |                        | x                        |
| WY             |   |  |   | x                      | x                        |

**TABLE E-15  
(Continued)**

**\*Other Actions and Notes:**

|    |  |
|----|--|
| IN | Advisory groups for specific industries.   |
| KS | Audit policy.  |
| MO | DNR has its own enforcement policy.  |
| NH | Federal amnesty program in place, state program in progress.   |
| TN | Department policy modeled after the national SBAP policy.  |
| VT | SBCAP itself -- only significant impacting violations are forwarded to regulatory programs for possible enforcement. None forwarded to date. |
| WY | Self audit legislation.  |

**TABLE E-16**  
**SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS**  
**OF THE EQUAL ACCESS TO JUSTICE ACT**

| <b>Program</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Review instances where state actions against small businesses appear unjustified</b> | <b>Pro bono legal services</b> | <b>Funding/technical assistance for groups aggrieved by regulatory actions</b> | <b>Other (See below)</b> |
|----------------|---|---|--------------------------------|--|--------------------------|
| AL             | N/R   |   |                                |  |                          |
| AK             |   | x   |                                | x  |                          |
| AZ             | x   | x   |                                |  |                          |
| Maricopa       | N/R   |   |                                |  |                          |
| AR             |   | x   |                                | x  |                          |
| CA             |   |   |                                | x  |                          |
| South Coast    |   |   |                                | x  |                          |
| CO             | x   | x   |                                |  |                          |
| CT             | x   |   |                                |  |                          |
| DE             | N/R   |   |                                |  |                          |
| DC             | N/R   |   |                                |  |                          |
| FL             | x   |   |                                |  | x                        |
| GA             | x   | x   |                                |  |                          |
| HI             | x   | x   |                                | x  |                          |
| ID             | x   |   |                                |  |                          |
| IL             | N/A   |   |                                |  |                          |
| IN             | x   |   |                                |  |                          |

N/A Not applicable    N/R No response

**TABLE E-16**  
**(Continued)**

| <b>Program</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Review instances where state actions against small businesses appear unjustified</b> | <b>Pro bono legal services</b> | <b>Funding/technical assistance for groups aggrieved by regulatory actions</b> | <b>Other (See below)</b> |
|----------------|---|---|--------------------------------|--|--------------------------|
| IA             | x   | x   |                                | x  |                          |
| KS             | x   |   |                                |  |                          |
| KY             |   | x   |                                |  |                          |
| Jeff Cty       | N/R   |   |                                |  |                          |
| LA             | x   | x   |                                | x  |                          |
| ME             | x   |   |                                |  |                          |
| MD             | N/R   |   |                                |  |                          |
| MA             | N/R   |   |                                |  |                          |
| MI             | N/A   |   |                                |  |                          |
| MN             | x   | x   |                                |  |                          |
| MS             | x   | x   |                                | x  |                          |
| MO             | x   | x   |                                | x  |                          |
| MT             | x   | x   |                                | x  |                          |
| NE             | x   |   |                                |  |                          |
| NV             | x   |   |                                | x  |                          |
| NH             | x   | x   |                                |  |                          |
| NJ             | N/R   |   |                                |  |                          |
| NM             | N/R   |   |                                |  |                          |

N/A Not applicable    N/R No response

**TABLE E-16**  
**(Continued)**

| <b>Program</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Review instances where state actions against small businesses appear unjustified</b> | <b>Pro bono legal services</b> | <b>Funding/technical assistance for groups aggrieved by regulatory actions</b> | <b>Other (See below)</b> |
|----------------|---|---|--------------------------------|--|--------------------------|
| NY             |   | x   |                                |  |                          |
| NC             | x   |   |                                |  |                          |
| ND             |   |   |                                |  | x                        |
| OH             | x   |   |                                |  |                          |
| OK             |   |   |                                | x  |                          |
| OR             | x   | x   |                                | x  |                          |
| PA             |   | x   |                                |  |                          |
| PR             | N/R   |   |                                |  |                          |
| RI             | x   |   |                                | x  |                          |
| SC             | x   |   |                                |  |                          |
| SD             | x   |   |                                |  |                          |
| TN             | x   | x   |                                | x  |                          |
| TX             | x   |   |                                | x  |                          |
| UT             | x   |   |                                |  |                          |
| VT             | None  |   |                                |  |                          |
| VA             | x   | x   |                                |  |                          |
| VI             | x   | x   |                                | x  |                          |
| WA             | x   | x   |                                |  |                          |

**TABLE E-16  
(Continued)**

| <b>Program</b> | <b>Routine review of SBTCP documents for compliance</b> | <b>Review instances where state actions against small businesses appear unjustified</b> | <b>Pro bono legal services</b> | <b>Funding/technical assistance for groups aggrieved by regulatory actions</b> | <b>Other (See below)</b> |
|----------------|---|---|--------------------------------|--|--------------------------|
| WV             | x   | x   |                                | x  |                          |
| WI             | x   |   |                                |  | x                        |
| WY             | N/R   |   |                                |  |                          |

**\*Other Actions and Notes:**

ND The Department media programs, including the SBAP, are aware of what equal access to justice and environmental justice concerns are; however, the Department is not aware of any problems in North Dakota.

WI Provide information on the act to interested parties.

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## **APPENDIX F**

# **PROGRAM EFFECTIVENESS**

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**TABLE F-1  
SBTCP PROGRAM GOALS AND MEASUREMENT STRATEGIES**

SBTCPs were asked to indicate up to 3 program goals, numbering them in terms of priority. These goals are ranked by the programs in the following table.

| Program     | Increase regulated community's understanding of environmental obligations | Increase regulated community's understanding of permitting | Increase regulated community's understanding of CAA | Provide site-specific compliance assistance | Encourage self-auditing | Improve compliance rates of regulated community | Other (See below) |
|-------------|---|--|---|---|-------------------------|---|-------------------|
| AL          | 1   | 2  | 4   | 5   | 6                       | 3   |                   |
| AK          | 2   | 3  |   |   |                         | 1   |                   |
| AZ          | 1   |  |   | 3   |                         | 2   |                   |
| Maricopa    | 2   |  |   | 3   |                         | 1   |                   |
| AR          |   |  |   | 2   | 3                       | 1   |                   |
| CA          |   |  |   |   |                         |   | 1&2               |
| South Coast |   | 3  |   | 1   |                         | 2   |                   |
| CO          | 4   | 3  |   | 2   |                         | 1   |                   |
| CT          | 1   | 2  |   |   |                         | 3   |                   |
| DE          | 1   |  |   | 2   |                         | 3   |                   |
| DC          | 3   |  | 2   |   |                         | 1   |                   |
| FL          | 1   |  |   |   | 3                       | 2   |                   |
| GA          | 1   |  |   | 3   |                         | 2   |                   |
| HI          | SBO 1   | SBO 3  |   | SBO 2<br>SBAP 1                             | SBAP 2                  | SBAP 3  |                   |
| ID          | 2   |  | 3   | 1   |                         |   |                   |

**TABLE F-1  
(Continued)**

| <b>Program</b> | <b>Increase regulated community's understanding of environmental obligations</b> | <b>Increase regulated community's understanding of permitting</b> | <b>Increase regulated community's understanding of CAA</b> | <b>Provide site-specific compliance assistance</b> | <b>Encourage self-auditing</b> | <b>Improve compliance rates of regulated community</b> | <b>Other (See below)</b> |
|----------------|--|---|--|--|--------------------------------|--|--------------------------|
| IL             | 1  |   | 2  |  |                                | 3  |                          |
| IN             | 1  |   |  | 2  |                                | 3  |                          |
| IA             | x  | x   | x  | x  |                                | x  |                          |
| KS             | 2  |   | 3  |  |                                | 1  |                          |
| KY             |  | KBEAP 2   | AQR 1<br>KBEAP 3   | KBEAP 1  |                                | AQR 3  | AQR 2                    |
| Jefferson      | x  |   |  | x  |                                | x  |                          |
| LA             | 2  | 4   | 6  | 3  | 5                              | 1  |                          |
| ME             | 1  |   |  | 2  |                                |  | 3                        |
| MD             | 1  | 3   |  |  |                                | 2  |                          |
| MA             |  |   |  | 2  |                                | 3  | 1                        |
| MI             | 2  | 3   |  |  |                                | 1  |                          |
| MN             |  |   |  | 2  |                                | 1  | 3                        |
| MS             | 1  |   | 3  |  |                                | 2  |                          |
| MO             | 2  |   |  |  | 3                              | 1  |                          |
| MT             |  |   |  | 2  |                                | 1  | 3                        |
| NE             | 1  | 3   | 5  | 2  | 4                              | 6  |                          |
| NV             | 1  | 2   |  | 3  | 4                              | 6  | 5                        |

**TABLE F-1  
(Continued)**

| <b>Program</b> | <b>Increase regulated community's understanding of environmental obligations</b> | <b>Increase regulated community's understanding of permitting</b> | <b>Increase regulated community's understanding of CAA</b> | <b>Provide site-specific compliance assistance</b> | <b>Encourage self-auditing</b> | <b>Improve compliance rates of regulated community</b> | <b>Other (See below)</b> |
|----------------|--|---|--|--|--------------------------------|--|--------------------------|
| NH             | 1  |   |  | 3  |                                | 2  |                          |
| NJ             | 1  | 2   |  |  | 3                              |  |                          |
| NM             | 1  |   |  |  |                                | 3  | 2                        |
| NY             | 2  | 3   |  |  |                                | 1  |                          |
| NC             | 1  |   |  |  | 3                              | 2  |                          |
| ND             | 1  |   |  |  |                                | 2  |                          |
| OH             | 1a   | 1b  |  | 2a   |                                | 3  | 2b                       |
| OK             | 1  | 3   |  | 2  |                                |  |                          |
| OR             | 1  | 6   | 7  | 3  | 5                              | 4  | 2                        |
| PA             | 1  |   |  |  |                                | 2  | 3                        |
| PR             | 2  |   |  | 3  |                                |  | 1                        |
| RI             | 1  |   |  | 3  |                                |  | 2                        |
| SC             | 2  |   | 3  |  |                                | 1  |                          |
| SD             |  | 2   | 3  | 1  |                                |  |                          |
| TN             | 1  |   | 2  |  |                                | 3  |                          |
| TX             | 1  |   |  | 3  |                                | 2  |                          |
| UT             | 3  | 2   | 1  |  |                                |  |                          |
| VT             | 3  | 4   | 6  | 1  | 5                              | 2  |                          |

N/A Not applicable    N/R No response

**TABLE F-1  
(Continued)**

| <b>Program</b> | <b>Increase regulated community's understanding of environmental obligations</b> | <b>Increase regulated community's understanding of permitting</b> | <b>Increase regulated community's understanding of CAA</b> | <b>Provide site-specific compliance assistance</b> | <b>Encourage self-auditing</b> | <b>Improve compliance rates of regulated community</b> | <b>Other (See below)</b> |
|----------------|--|---|--|--|--------------------------------|--|--------------------------|
| VA             | 1  | 3   |  |  |                                | 2  |                          |
| VI             | 3  |   |  | 2  | 1                              |  |                          |
| WA             | Ecology 1<br>OAPCA 1<br>NWAPA 3<br>SCAPCA 2                                      | Ecology 2<br>OAPCA 2  |  | Ecology 3<br>OAPCA 3<br>NWAPA 2<br>SCAPCA 3        |                                | NWAPA 1<br>SCAPCA 1                                    |                          |
| WV             |  | 3   |  | 2  |                                | 1  |                          |
| WI             | 2  | 3   |  |  |                                | 1  |                          |
| WY             | 1  | 2   | 3  |  |                                |  |                          |

**\*Other Actions and Notes:**

- CA #1 -- Increase the regulated community's participation in development of permitting and compliance programs.  
#2 -- Increase the regulated community's satisfaction with air quality permitting and compliance programs.
- KY Air Quality Representative #2 goal to increase participation of small business stationary sources in the development of the air program.
- ME To encourage businesses to implement pollution prevention techniques and to help them save money.
- MA To promote reduction in the use of toxic materials.
- MN To move towards full multimedia assistance.
- MT To provide financial/technical pollution prevention assistance.
- NV To increase regulatory staff's understanding of small business concerns and needs.
- NM To redirect efforts to make the permitting process easier for the regulated community.
- OH To provide financing assistance to small businesses to help reduce the economic impact of compliance.

**TABLE F-1**  
**(Continued)**

|    |   |
|----|---|
| OR | To reduce environmental impacts by providing practical, cost-effective methods for small businesses.                |
| PA | To increase the use of pollution prevention and the adoption of strategic environmental management.                 |
| PR | To get a full start on the SBAP by 1999.  |
| RI | To create and provide plain English materials regarding state and federal regulations specific to industry sectors. |

**TABLE F-1  
(Continued)**

SBTCPs were asked how they plan to evaluate whether the above-stated goals are being met as well as the results of this measurement process.

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS   |
|---------|---|--|
| AL      | Tracking phone calls on the hotline and making note of the number of calls we receive as a result of recent speaking engagements involving a regulated group.   | We get a good feel for the most important issues facing the regulated community, and we get feedback on the effectiveness of our outreach efforts when regulated individuals call soon after a speaking engagement. Repeat callers also are a good indicator of the effectiveness of our efforts and trust from the regulated community.   |
| AK      | <ol style="list-style-type: none"> <li>1. Client satisfaction - using feedback forms.</li> <li>2. Output measures - technical assistance database tracks numbers of calls, outreach, etc.</li> <li>3. Compliance improvements - "to do" lists are provided to clients at the end of site visits. Clients sign and return form stating corrections have been made. Staff conduct additional follow up visits at 10% of sites visited.</li> <li>4. Overall impact - one-page outcome forms are sent to clients receiving site visits at the end of the fiscal year. We request additional information on compliance improvements and other beneficial outcomes resulting from the site visit.</li> <li>5. Anecdotal case studies - testimonials or other accounts of cost savings, safety and health benefits, efficiency improvements, etc.</li> </ol> <p>Currently, SBAP is using technical assistance database to track the number and types of assistance given to small businesses. January 1999 is the first time many small businesses had to send in reports to the air quality program. SBAP will work with the air quality program to track the number of small businesses that are out of compliance and SBAP efforts to achieve compliance corrections.</p> | We have previously described some of our outcomes and results. With respect to the SBAP portion of CAO, we have a very good understanding of what businesses are requesting based on the database. We have seen the number of permit assistance requests go down. We have seen the number of non-enforcement related compliance assistance go up. This was expected, as businesses moved from trying to get permits to trying to comply with the permits. Of note, in FY98 the <b>SBAP was able to provide technical assistance to help 33 facilities avoid the need for a permit.</b> |

**TABLE F-1  
(Continued)**

| PROGRAM      | STRATEGIES TO EVALUATE GOALS   | RESULTS OF MEASUREMENT PROCESS  |
|--------------|--|---|
| AZ           | <p>On-site visit evaluations are accomplished by conducting a follow-up visit 60 days after the facility receives our report. At the time of the follow-up, we measure the change in compliance.</p> <p>Outreach goals to improve understanding of environmental issues are evaluated based on number of presentations and number of attendees, along with a survey of the presentation.</p> <p>Another goal of the program is to respond quickly and without transferring people within the department, if possible. This goal is tracked through our client log.</p> | <p>On-site visits have proven to be very effective, with <b>over 70% of all violations detected being corrected by the time of the follow-up visit.</b> Issues not corrected by that time are usually more complex or require significant capital expenditures.</p> <p>Outreach through presentations has been very effective for our program. Just having our name and face in front of a variety of people helps encourage them to call and seek help more readily. By developing a few template presentations and then modifying for a specific audience, we are able to tailor a presentation for a specific audience while not spending a great deal of time. We have received high marks for these efforts.</p> |
| Maricopa Cty | <p>Our data shows we are assisting more sites every year. We plan to target at least 2 new industries starting with wood furniture manufacturing. We will provide industry-specific information and have the Air Quality Division Manager sign the letter.</p> <p>We will conduct at least one seminar this year targeting coatings/solvents.</p>  | <p>By receiving more referrals and assistance requests, we know we are meeting our goals. We also send every site we help (significantly) an evaluation. Almost every evaluation comes back as "excellent service." We track sites by date and alphabetically, rather than by industry or type of assistance. Many businesses say they were unaware they needed a permit, and many are grateful for on-site visits and assistance with the application. We try to explain technical terms in a non-technical way, both verbally and in writing.</p>   |
| AR           | <p>No evaluation has been attempted. Number of small business firms needing assistance exceeds resources of agency.</p>  | N/A   |

**TABLE F-1  
(Continued)**

| PROGRAM     | STRATEGIES TO EVALUATE GOALS   | RESULTS OF MEASUREMENT PROCESS   |
|-------------|--|--|
| CA          | <p><i>#1 - Increase the regulated community's participation in development of permitting and compliance programs.</i> ARB's Office of the Ombudsman tracks each regulatory item and works with ARB divisions to help identify key stakeholder constituencies. It assists staff with outreach efforts to notify stakeholders of regulatory development workshops and board hearings. It reviews staff outreach for regulatory items and reports to the ARB board during hearings on the sufficiency of the outreach process. Outreach efforts are measured and reported as a performance measure per ARB's strategic plan. Stakeholder satisfaction with the outreach process is measured using a survey. The survey results are reported as a performance measure per ARB's strategic plan.</p> <p><i>#2 - Increase the regulated community's satisfaction with air quality permitting and compliance programs.</i> ARB holds periodic stakeholder forums to hear stakeholders' views about ARB's programs, including permitting and compliance. Stakeholders told us in 1996 the key elements of an effective air quality management program that were important to them. These included sound science, simplified regulatory processes, improved public education efforts, involving stakeholders in program development and implementation efforts, and pursuing emission reductions proportionate to emission contributions.</p> <p>These key themes were in large part incorporated into ARB's strategic plan. One performance measure in the plan is to measure stakeholder satisfaction with programs. In 1998, the ARB Ombudsman's Office developed a "How Are We Doing?" survey as a follow-up to the 1996 forums. We hope to administer the survey in 1999 and report the results as a program performance measure per ARB's strategic plan.</p> | <p><b>#1 - The ARB Office of the Ombudsman measures the number of stakeholder workshops, meetings, and conferences held annually on a fiscal year basis (July 1-June 30). For FY 97/98, there were 264 meetings on 14 regulatory items (about 19 meetings per regulatory item).</b> This compares to 24 meetings per item for 10 regulatory topics for the year before.</p> <p>Since November 1998, the ARB Office of the Ombudsman has been measuring stakeholder satisfaction with the regulatory outreach process using a survey. The first partial cycle of results will not be completed until July 1999; however, preliminary results from eight regulatory items indicate very favorable satisfaction with stakeholder involvement processes. <b>Average satisfaction in six process areas, including the overall regulatory development process, ranged between 3.0 and 3.5 on a scale of 1 to 4, with 1 being poor and 4 being excellent.</b></p> <p><b>#2 - We hope to administer the program satisfaction survey in 1999 and report the results as a program performance measure.</b></p> |
| South Coast | <p>Every year, a work plan with (when appropriate) quantifiable goals is developed in coordination with the budget. The work plan includes federal, state, and local agency programs that need to be implemented by the SBAP. Assessment of on-going business consultation goals is handled through the statistics generated by our automated client tracking system. This system allows the program to track the success of outreach to business sectors and cooperative local governments.</p>   | <p>The technical consultation program met its goals for the year. The measurement system (described to the left) still needs some enhancements to more accurately measure certain program work. This year, we are modifying the tracking system to account for special projects associated with rule-specific outreach. The SBTCP kept careful records of all advice given to clients, types of assistance provided (e.g., rule interpretations, permit application assistance, compliance reviews, financial assistance), types of industries assisted, geographic areas, and relative staff productivity. Hotline calls to SBAP are a good indicator of current and emerging small business concerns.</p>  |



**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS   |
|---------|---|--|
| CO      | <p>Initiated a customer feedback loop via a "customer service survey" program. A survey is mailed to every site visit conducted. The results are tracked in a database.</p> <p>Conduct industry-specific workshops and obtain workshop evaluation forms.</p> <p>Feedback from department's enforcement group.</p>   | <p>General - The survey process has been instrumental, as we have received specific recommendations for improvement. However, the return rate needs to increase. The workshops have allowed interface with individual small business owners to resolve specific compliance issues.</p> <p>Specific data - We needed to establish specific measurement programs/systems and will do so in 1999.</p> |
| CT      | <p>We are evaluating program effectiveness through the use of questionnaires and surveys. We also have developed outcome-based measures of performance as part of targeted initiatives. Outcome measures have included numbers of facilities submitting permit applications as a result of outreach, increases in compliance with specific requirements, and increases in compliance rates.</p>   | <p>SBAP has pursued measurement efforts very narrowly for specific, well-defined compliance objectives. For specific compliance assistance efforts, SBAP has met programmatic goals. However, we continue to see an expansion of the regulatory universe that cannot be addressed through current resources.</p>   |
| DE      | <p>SBAP is working with business sectors that will be immediately impacted once DE takes delegation of certain programs identified by our Engineering and Compliance branch. SBAP works to provide compliance assistance information to these sectors prior to our state taking delegation of a program. One way to evaluate the effectiveness of our SBAP is to hopefully realize a reduction in enforcement actions taken in these delegated sectors and to evaluate the quality of recordkeeping requirements by the businesses.</p> <p>We feel as though an increase in small business callers seeking assistance is a sign that our program is having a positive effect. We are working hard to improve communications between our regulatory programs and the small business community and to increase the level of trust and confidence on both sides.</p> | <p>We track the number of phone calls and the number of requests for assistance. Each year, we see an increase in requests for assistance. In addition, we have more than one request for assistance from the same business, which indicates a level of confidence in our program within the business community.</p>   |
| DC      | <p>The frequency of calls received from small businesses is an indication that the information is getting around. Once you talk to the caller, you will be able to determine how much he/she knows or understands about the regulations.</p>  | <p>With the limited resources that the program has, this is the only feasible way of measuring the program's goal.</p>   |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS   |
|---------|---|--|
| FL      | <p><i>#1 - Increase understanding.</i><br/>Manage 800 line for regulatory and technical assistance inquiries. Conduct training and associated pre- and post-training surveys. Target one significant small business industry per year (currently printers).</p> <p><i>#2 - Improve compliance.</i><br/>Training increases awareness, and thus, compliance rates. Developed and distributed dry cleaners compliance assistance calendar.</p> <p><i>#3 - Encourage self audits.</i><br/>Developed self audit road maps for printers to be distributed during 1999 training workshops.</p> | <p>SBAP met many goals in 1998. Statistical data for small businesses showed which types of businesses and how many businesses of each industry type were reached. Hopefully, this will enable future relationships with these businesses. The measurement system worked, but with a variety of people collecting data, a more uniform recording plan has been implemented for 1999. Statistical data are as follows:</p> <p>Initially, outreach workshops were used to create PERC awareness. Reductions in PERC were achieved proving the success of the workshops. However, compliance with recordkeeping and reporting remained low. To remedy this situation, dry cleaner calendars were created that enabled businesses to easily enter data on their calendars and then tear off information each month to send in and meet compliance requirements. In 1996, there was a 12% average compliance rate in recordkeeping. In 1998, recordkeeping and reporting increased to an average of 73% for the year. <b>Therefore, from 1996-1998, a 61% increase in compliance was achieved due directly to calendar distribution.</b></p> <p>Responded to 245 regulatory and technical assistance requests (via 800 line, letters, e-mails, etc.).</p> |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS   | RESULTS OF MEASUREMENT PROCESS   |
|---------|--|--|
| GA      | <p>SBAP prepared measurable objectives to help us achieve our 1998 goals. Those objectives were grouped under Education and Technical Assistance.</p> <p>Education - Publish a quarterly newsletter. Develop a working relationship with 4 trade associations that results in the preparation of educational materials for distribution. Sponsor an exhibit at one trade association exposition. Make 8 informational presentations to professional and civic associations. Establish and maintain a web page for small business owners to use for distributing relevant information in a timely manner. Establish a repository of P2 and SBAP resources. Ensure that each staff member attends at least one training course or small business assistance conference, in order to provide effective staff development and training in current methodologies and practice. Establish a combined database of small businesses by SIC code.</p> <p>Technical Assistance - Establish a toll free telephone assistance line. Prioritize small business technical assistance needs by industrial classification and prepare two technical information assistance brochures. Make 12 site assessment visits. Assist 12 businesses with permitting. Respond to 300 technical assistance requests via telephone within 24 hours and complete any required on-site follow-up at the client's convenience. Establish a liaison with at least one other state agency and work cooperatively on a joint consumer assistance project to foster better interagency cooperation.</p> | <p>SBAP far exceeded our program goals for 1998. We gathered comments from the businesses assisted via a customer survey form. We identified measurable objectives that allowed us to readily determine that our goals had been met.</p>                     |
| HI      | <p>SBO - The number of public speaking engagements with business advocacy, trade associations, and small business permittee groups. The number of publications and answers to questions raised by individual regulated businesses disseminated. The number of compliance cases undertaken and closed.</p> <p>SBAP - The number of services/assistance provided to small businesses.</p>  | <p>SBO - Established the Compliance Assistance Office, conducted outreach, increased services to target client group, and closed 21 compliance assistance requests/cases.</p> <p>SBO has received positive feedback and subsequent calls for assistance.</p> |
| ID      | <p>Performance measurements are under development. The goals are for the future and do not necessarily represent the past. As of now, we are keeping track of the number of calls, meetings, site visits, etc.</p>   | <p>Discovering that more people were using the SBTCP than was previously thought.</p>  |

**TABLE F-1**  
**(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS   |
|---------|---|--|
| IL      | <p>SBO - Client satisfaction survey to asphalt plants, chrome platers, rock crushers in Spring 1998.</p> <p>SBAP - Tracks the number of calls to the helpline, nature of the questions, kinds of information sent, workshops held and number of attendees, and articles printed in trade magazines. We do a monthly report of program activities as well as the Annual Report to Karen Brown. In addition, we note any partnership activities.</p> <p>The SBAP currently sends surveys to all clients after they receive assistance to gauge program performance. We have experienced a high approval rating with 94% of clients returning the survey and stating they were very satisfied with services they were provided.</p>  | <p>We have tracked all surveys sent to clients for rating. <b>To date, the SBAP has a 94.44% approval rating.</b></p>  |
| IN      | <p>Dry Cleaners - Noting dry cleaners that come into compliance following an initial site visit.</p> <p>Wood Furniture - Increase the wood NESHAP reports filed on time by sending reminders and making information available to this sector in a variety of ways.</p> <p>Vehicle Maintenance - Workshop evaluation forms are distributed at each workshop.</p> <p>HVAC - Approximately 15% of the industry is participating in the Thermostat Reduction and Recycling Program.</p> <p>General - Number of referrals from past clients. Receipt of "thanks" and appreciation, either verbally or written. Follow-up calls or visits show improved compliance rates. Evaluation sheets from workshops. Evaluation from our Environmental Performance Partnership Agreement goals and our Measure of Success Goals.</p> | <p>The Indiana SBTCP met our program goals. Our measurement system of "numbers reached and assisted" worked as defined in the Environmental Performance Partnership Agreement with EPA and our own Agency's Measures of Success.</p> <p>We worked cooperatively with our target industries; provided comprehensive compliance manuals, workshops, and on-site assistance; and kicked-off several new 5-star recognition programs. All of our workshop evaluations have provided consistent, positive feedback, and companies continue to request more technical help, both on the phone and in person.</p> |

**TABLE F-1**  
**(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS   |
|---------|---|--|
| IA      | <p>Our evaluation system focuses on our services. We do not have a system to track and relate client evaluation to specific program goals.</p> <p>We send an evaluation form to every on-site visit client or detail assistance (defined as any assistance involving more than one hour of staff time) client. They rate the quality and usefulness of assistance. Completed and returned evaluation forms are entered into a database, which can generate a number of reports based on the client evaluations.</p> <p>Also, we develop case studies of clients we have worked with whenever we feel it is appropriate.</p> | <p>Returned evaluation forms show that <b>over 95% of respondents found the services "excellent" and "very helpful"</b> and would recommend our services to other businesses.</p> <p>Evaluation feedback is only one part of the measurement for meeting program goals. Among other indicators, increased client referrals, repeat visit requests from past clients, and a steady backlog of site visit requests (over 200) show us the confidence of the small business community we have earned.</p> |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS   | RESULTS OF MEASUREMENT PROCESS   |
|---------|--|--|
| KS      | <p>Following all on-site assessments, workshops, and conferences, evaluation forms are sent to participating businesses. Six months later, those businesses receiving on-site assistance receive another evaluation to determine if advice provided has been implemented by the business. In addition, numbers and comments provided by businesses are recorded. Evaluations are provided after every workshop, which relates to our second ranked goal regarding the "regulated community's understanding of their environmental obligations," and to determine the quality of the workshop. Almost all workshop evaluations show extremely positive results.</p> | <p>The program continues to grow as services are known throughout the state. We receive many positive comments and letters of thanks for our services. Evaluations following on-site assessments show improvements in most businesses. Relationships between the technical assistance program and the regulatory agency continue to improve with regulators referring many businesses for SBAP services.</p> <p>Plans for 1999 include a detailed survey of businesses through cooperation of the SBAP and SBO.</p> <p><b>1998 survey results:</b></p> <ul style="list-style-type: none"> <li>• Did you implement recommendation (made by SBAP)? Yes-48; No-25; Planned-10</li> <li>• Did you originally contact the SBAP for help with a compliance related question? Yes-16; No-5</li> <li>• Were these compliance concerns resolved as a result of PPI assistance? Yes-15</li> <li>• Was the delivery of the written report timely? Yes-15</li> <li>• What sections of the written report were most helpful? executive summary-10; waste reduction opportunities-1; regulatory contacts-5; vendor contacts-5; MSDS-3; case studies-2; other (main body of report)-1</li> <li>• How would you rate the content of the report (1-10 with 10 best)? 10-3; 9-2; 8-6; 7-3</li> <li>• How would you rate the length of the report? 10-3; 9-4; 8-5; 7-1; 6-2</li> <li>• Was the report easy to read? 10-6; 9-5; 8-3</li> <li>• Was the information provided in the written report what you asked for/needed? Yes-14</li> <li>• Was the report, in combination with information provided during the site visit enough to implement the recommendations? Yes-14; No-1 (needed cost analysis)</li> <li>• Approximately how many total person hours did you and your staff spend with SBAP staff conducting the site visit and reviewing/implementing report recommendations? Answers varied from 2 to 40 hours.</li> <li>• What dollar value would you place on the service provided? \$200-\$5,000</li> <li>• Would you recommend our services to another company? Yes-21</li> </ul> |

**TABLE F-1  
(Continued)**

| PROGRAM       | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS  |
|---------------|---|---|
| KY            | <p>The AQRSB developed 3 questionnaires during 1998 to assist in evaluating 3 services - technical assistance to phone callers, the column that has been in distribution for 3 years, and the work of the DEP in staffing and responding to the CAP.</p> <p>SBAP evaluates its efforts to provide compliance assistance and educational information to small businesses through evaluation cards; requests for "success stories" prepared by the Ombudsman; meetings and discussions with businesses and industry organizations; and working with the regulatory agency, CAP, and other stakeholders.</p> | <p>Responses to questionnaire on assistance to telephone callers indicated a <b>high level of satisfaction, using a scale of 1-4 with 1 representing poor service and 4 representing excellent service. The average was 3.9.</b> This composite rating indicates some success in increasing understanding of the CAA of 1990.</p> <p>A survey was sent to the newsletters that receive the AQRSB column. 4 out of 12 newsletters responded. As a result of these surveys, more information is available on how the column is being used and valuable suggestions were received on how to improve it, some of which have been incorporated. The results of these surveys were valuable in assessing how useful a tool the column is in reaching the regulated community.</p> <p>A survey was developed and sent to CAP members to help the DEP evaluate its assistance to the Panel. A second mailing of the survey is scheduled for 2/99 due to the low initial response.</p> <p>Through the cooperation of the regulatory agency, the ombudsman, other partners, and <b>stakeholder requests for SBAP assistance increased dramatically (approaching 50%)</b> in the last 6 months of 1998. Client evaluation cards indicate a high level of customer satisfaction. A growing partnership network indicates the program is effective in delivering quality assistance and information.</p> <p>KBEAP provided 71 businesses with compliance and technical assistance in 1998. Each company was sent an evaluation card. KBEAP received 19 cards for a 27% return rate.</p> <p><b>Customer satisfaction KBEAP program services:</b></p> <ul style="list-style-type: none"> <li>• Knowledge of air quality issues: A-18; B-1</li> <li>• Courteousness: A-19</li> <li>• Timeliness in responding to your request: A-16; B-3</li> <li>• Grade KBEAP's overall performance: A-19</li> </ul> <p><b>Value of KBEAP services:</b></p> <ul style="list-style-type: none"> <li>• Did KBEAP services save your company money? Yes-18; No-1</li> <li>• Is there a need for similar services in water and waste management programs? Yes-10; No-9</li> <li>• Did your experience with KBEAP result in your company decreasing emissions? Yes-7; No-11; N/A-1</li> <li>• Will you contact KBEAP if additional air quality assistance is needed? Yes-19</li> </ul> |
| Jefferson Cty | N/R   |   |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS  |
|---------|---|---|
| LA      | We send an evaluation form to every small business we assist. We have two levels of assistance: contacts and assists. Contacts are advice given by phone and seminars. Assists are extensive engineering assistance, such as emission inventories, permit applications, and on-site audits. We maintain a database of these activities and compare with previous time periods.  | The returned evaluation forms were favorable in every case. We have increased the number of contacts and assists each year since 1992.  |
| ME      | Customer comment card sent out with all written information:<br>1. Did you receive regulatory information you were previously unaware of?<br>2. Did you receive technical information on your process or service?<br>3. Will the information help you achieve regulatory compliance?<br>4. Will the information help you reduce pollution?<br>5. Will the information help you reduce costs?  | Those who responded indicated the following:<br>1. Yes-69%; No-17%; N/A-14%<br>2. Yes-52%; No-24%; N/A-24%<br>3. Yes-65%; No-7%; N/A-28%<br>4. Yes-48%; No-21%; N/A-31%<br>5. Yes-31%; No-38%; N/A-31%  |
| MD      | N/R   | N/R   |
| MA      | <p>On-site visits: We included a survey of our service with on-site visits during 1998. This survey asked for a very critical review, focusing on problems and improvements. The results were very complimentary. We stopped surveying, because although it was valuable to know our services were greeted positively, the survey was not providing us with the information we needed -- it was not addressing the shortcomings.</p> <p>Sometimes we have the data to measure the company's waste and use. We assess their P2 opportunities and compliance. We provide the recommendations and follow-up to see if they have addressed their compliance issues and implemented the P2 opportunities.</p> <p>Sector projects: We incorporate measurements into some of our outreach projects. The dry cleaners project produced data that we are examining. The Printers Project (pre-1998) used Environmental Business Practice Indicators and produced before and after information. Our medical facilities project utilized a conference attendee survey and a follow-up survey.</p> <p>Outreach projects: We examine the number of on-site visits or requests for help that they generate.</p> | <p>Measurement of waste/use ratios shows dramatic improvement by companies visited by OTA.</p> <p>Best estimate from follow-up program shows high rate of implementation (approximately 60%) of P2 suggestions and higher rate (approximately 80%) of addressing identified compliance issues.</p> <p>Sector results for printers showed excellent results (pre-98); dry cleaners not tabulated. Before and after results may not be usable.</p> <p>Outreach for autobody and municipal departments of public works generating significant number of on-site visits and phone assistance. Substantial numbers of manuals requested by local officials for distribution.</p> |



**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS  |
|---------|---|---|
| MI      | <p>SBO - Evaluates its services from the feedback received by economic development staff that visit statewide companies. Results of measurement process not applicable.</p> <p>SBAP - Targeted the following objectives (based on individual staff work plan objectives) for completion during FY97/98 (October 1997-September 1998):</p> <p>New workshops - 6<br/> New guidance documents - 9<br/> Publication revisions - 7<br/> Responses to requests for technical assistance - 1,000<br/> On-site visits - 15<br/> Permitting assistance meetings - 20<br/> Articles for newsletters, etc. - 8<br/> Partnership opportunities - 16<br/> Presentations - 24</p> | <p>SBAP - Evaluates quality of its services and effectiveness by reviewing its projected and actual program objectives and the level of technical assistance provided on a monthly and annual basis. Some SBAP measurement tools include the review and summary of overall responses from customer surveys that accompany all new and revisited SBAP guidance publications, responses from evaluation forms returned after each SBAP workshop, and appreciation letters submitted by satisfied customers. A summary of these reports is shown below:</p> <p><b>New workshops = 8 completed (objective met 100%; exceeded by 33%)</b><br/> Workshop evaluations 1-5 (5 = excellent)</p> <ul style="list-style-type: none"> <li>• Handling Asbestos (4 sites) = 4.0 average</li> <li>• Surface Coating of Metal Parts (2 sites) = 4.3</li> <li>• Managing Chemical Risk (RMP) (1 site) = 3.8</li> <li>• MI Air Emission Reporting System Peer Review (1 site) = 4.1</li> </ul> <p>Percent attendees anticipating future action or compliance based on workshop activity (as reported by attendees)</p> <ul style="list-style-type: none"> <li>• Handling Asbestos = 48.5%</li> <li>• Surface Coating of Metal Parts = 62%</li> <li>• Managing Chemical Risk (RMP) = 70%</li> </ul> <p><b>New guidance documents = 5 completed (objective met 55%; 4 final/1 draft)</b><br/> Document evaluations 1-5 (5 = excellent)</p> <ul style="list-style-type: none"> <li>• Permit to Install Guidebook for Determining Applicability = 4.5</li> <li>• Surface Coating of Metal Parts Fact Sheet = draft</li> <li>• Continuous Emission and Continuous Opacity Monitoring Fact Sheet - not measured, created for the air quality regulatory division</li> <li>• Understanding the Asbestos NESHAP Fact Sheet = 4.0</li> <li>• What is an Air Contaminant? Fact Sheet = 4.2</li> </ul> <p><b>Publication revisions = 3 completed (objective met 43%)</b></p> <ul style="list-style-type: none"> <li>• MI Air Use Permit Technical Manual - not a measured SBAP publication</li> <li>• Air Pollution Control "101" Fact Sheet = 4.7</li> <li>• Renewable Operating Permit Program: Guidebook for Completing Forms = 4.3</li> </ul> <p><b>Requests for technical assistance = 1,358 completed (objective met 100%; exceeded by 36%)</b></p> <p><b>On-site visits = 26 completed (objective met 100%; exceeded by 73%)</b></p> <p><b>Permitting assistance meetings = 52 completed (objective met 100%; exceeded by 60%)</b></p> <p><b>Articles for newsletters, etc. = 8 completed (objective met 100%)</b></p> <p><b>Partnership opportunities = 9 completed (objective met 56%)</b></p> <p><b>Presentations = 18 completed (objective met 75%)</b></p> |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS  |
|---------|---|---|
| MN      | <p>Goal #1 - Compliance rates based on follow-up enforcement initiatives by MPCA's regulatory programs (e.g., NESHAP compliance rates among degreasers, platers, and wood finishers).</p> <p>Goal #2 - Same as above. Also, follow-up surveys have indicated a 95% satisfaction rating for program site visits.</p> <p>Goal #3 - Will attempt to use similar methods as above.</p>                        | <p>Results of the MPCA's NESHAP enforcement initiative involving degreasers, platers, and wood finishers indicated a <b>98% compliance rate</b> among businesses inspected. This high compliance rate has been linked to SBAP's compliance assistance efforts within these sectors. In this respect, we feel that the SBAP is reaching its goals in terms of getting the regulated community into compliance.</p> <p>The program continues to receive very positive responses from the small business community as a result of its on-site compliance assistance. The program may conduct additional surveys in the future to learn if the site visits can be further tailored to meet the needs of the small business community.</p> |
| MS      | N/R   | N/A   |
| MO      | <p>We sent out an evaluation survey to every fifth facility helped.</p> <p>Our on-site assessment team performs a follow-up on each facility they visit to see if the recommendations have been followed.</p> <p>We are continuing to write industry-specific P2/compliance guides and other technical bulletins.</p>   | <p>The surveys indicate that facilities have received the assistance and information they needed to attain compliance.</p> <p>Follow-up on the on-site assessments indicates that most violations are being corrected and the P2 recommendations are being followed.</p>  |
| MT      | SBO/SBAP keeps statistics on the number of site visits it conducts each year and records the number of participants at workshops and meetings. Records are kept about recipients of mailings and of callers on the toll-free hotline.   | SBO/SBAP did meet its goals to provide extensive on-site assistance to the vehicle service, automobile refinishing, dry cleaning, and chrome plating sectors. Other goals were to establish a low-interest loan program and to add multimedia services. All of these goals were accomplished in 1998. SBO/SBAP provided multimedia P2 assistance to each of the businesses identified by EPA's Sector Initiative and extended loans to over 20 service stations, 4 auto body shops, 2 heating/air conditioning projects, and 2 small manufacturers to purchase energy efficient and P2 equipment.   |
| NE      | NE has one person that handles the SBAP, the ombudsman activities, the one-stop permit assistance program, and the small business information library. This includes site visits, phone calls, compliance tracking, public meetings, association meetings, and all reporting requirements. The Public Advocate will continue to provide these services to the businesses, industry, and the public in NE. | The program is a success in NE. Tracking is provided on a month by month report that covers all activities of the Public Advocate.  |
| NV      | <p>Survey forms are circulated following each seminar or workshop to evaluate outreach efforts.</p> <p>Tracking sheets are maintained for each SBAP contact, logging name, business, assistance needed, etc. These forms indicate an increasing number of referrals from regulatory staff, which indicates their greater understanding of small business needs and concerns.</p>                          | Goals for 1998 are not necessarily reflected in the choices shown above. SBAP is fairly new and much of the staff's time and program resources have been focused in program development and networking with the business community. The number of contacts has increased each quarter and this is a good indication that the regulated community has an increased awareness of their environmental obligations. Additionally, the number of requests for on-site compliance assistance has increased.   |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS   | RESULTS OF MEASUREMENT PROCESS   |
|---------|--|--|
| NH      | <p>Measuring effectiveness of activities up to this point has been fairly general (i.e., number of manuals requested and sent, quantity of newsletters sent, and number of on-site visits conducted). Many on-site visits are the direct result of referrals from enforcement personnel, so these visits usually result in quantifiable compliance assurance due to follow-up activities by the enforcement personnel.</p> <p>One quantitative measure we are using is the percentage of identified businesses in an industry sector we are reaching through various activities. Two primary sectors we are concentrating on are the automotive repair and refinishing industry and the printing industry.</p> <p>We routinely send out short, self-mailing questionnaires to businesses that receive specific compliance information, such as industry-specific guidance manuals. Unfortunately, the return rate is usually very low (i.e., less than 25%).</p> | <p>At this time, it is not possible to make any sweeping statements on the effectiveness of the measurement process.</p> <p>We are confident that the activities are successful based on the conversations with those businesses we have worked directly with as well as through the information provided on returned surveys. In addition, for the sectors where we have has the opportunity to somewhat accurately identify the number of existing sources in the state, we have been able to determine the sector penetration rate for activities such as mailings.</p> <p>What we have not been able to accurately determine is the increased compliance rate and environmental improvements businesses have undertaken on their own after receiving non-on-site assistance (such as newsletter articles, etc.). We continue to evaluate ways to collect, compile, and present these data to provide "hard" measurement information.</p> |
| NJ      | <p>Recordkeeping on the number and type of businesses assisted through the program.</p> <p>Use of surveys with Environmental Air Compliance for Small Business Audit/Training seminars.</p> <p>Use of surveys at workshops done in conjunction with EPA Region II, dry cleaners association, etc.</p> <p>Use of telephone logs.</p>  | N/A  |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS   |
|---------|---|--|
| NM      | <p>Early in the year, when 2 of our staff were transferred, we took the time to re-evaluate our overall SBAP goals. Our program had been a very labor-intensive, one-on-one, client-based effort that was time demanding of our staff, which only allowed limited outreach activities. We decided to redirect our efforts to make the permitting process easier for small businesses, to reach more businesses, and to reach whole sectors whenever possible.</p> <p>Several activities were initiated with the end goal of making the permitting process easier for small businesses and shortening the time it takes to get a permit. We began by developing regulatory enabling language, authorizing the Air Quality Bureau to write general permits for categories of similar sources with an easier application process and a 30-day turnaround. We held public and similar source information meetings to make certain our approach was on target with the needs. We then wrote drafts of general permit regulations for rock crushers, asphalt plants, and concrete batch plants. We went to public hearings on a general permit for oil and gas compressor stations.</p> <p>We made major revisions to our construction permit regulation, 20 NMAC 2.72. These revisions created an exemption list and streamlined permit revision procedures that were intended, in part, to assist small businesses by eliminating certain activities, thereby making it easier and quicker to get a construction permit for those who qualify.</p> <p>We also dedicated significant staff time to writing a Plain English Manual for Construction Permit Applications to make it easier for the small business person to understand and apply for a construction permit or Notice of Intent. The manual will be made available to all small businesses in NM when complete.</p> | <p>We believe we met our new, redirected program goals. The feedback from the public/sector meetings and public hearing indicate we are going in the right direction for our small business clients in paving the way for an easier, more understandable permitting process.</p> <p>For one-on-one clients, we currently are operating as a clearinghouse for regulations and permitting contacts.</p> |

**TABLE F-1**  
**(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS  |
|---------|---|---|
| NY      | <p>The program primarily uses statistics on the response rates to mailings and the numbers of hotline calls, Ombudsman cases, mailings, permits completed, and on-site audits that occur each year.</p>   | <p>SBAP tracks the numbers of hotline calls, audits conducted, permits and registrations completed, and attendance at workshops. SBAP has surveyed all program contacts via our newsletter, <i>Clean Air News</i>, for their feedback on the content and frequency of the newsletter. Responses were favorable, indicating reader satisfaction.</p> <p>SBAP conducted 17 audits this year and provided site-specific assistance to these businesses. We responded to over 1,300 SBAP hotline calls with requests that ranged from routine program information to very specific technical assistance. We provided permitting assistance, completing 14 state facility permits and 52 minor facility registrations. SBAP also helped 71 businesses reply to a mass mailing from the state regulatory agency, DEC, which brought them into compliance with the permitting regulation and prevented them from being classified as significant violators in the future.</p> <p>SBEO tracks the number of hotline calls and the number of ombudsman cases completed each year. There were <b>over 700 calls to the ombudsman hotline in 1998 representing a 45% increase over 1997. The ombudsman handled 71 cases in 1998, which also represents about a 45% increase over 1997.</b></p> <p>SBEO also tracks the response rate to seminar mailings in terms of number of attendees at the seminars. Generally, a participant response rate of 10% of the number of mailings sent is considered successful. All of the seminars/workshops produced by SBEO in 1998 had participant response to mailing rates well above this benchmark. <b>The Combustion Boiler workshop had a 66% response rate, the PPIS seminar had a 47% response rate, the statewide dry cleaning seminar had a 15% response rate, and the Spanish dry cleaning seminar had a 45% response rate.</b></p> <p>There were 5 Regulatory Alert postcards sent in 1998. The number of hotline calls from these sectors increased dramatically after the mailings were sent. Over 90% of the businesses that contacted the hotline from these targeted sectors indicated that they heard of the SBEO through the postcard mailing.</p> |
| NC      | <p>We have not had a good way to measure this in the past. This is a priority this year, and we plan to develop surveys and change our strategy to target particular compliance problems. We will be improving our communication and dialogue with trade associations and regulatory agencies to identify areas of need and address those areas. Documenting increased understanding vs. improving compliance is easier, since the regulatory agencies determine compliance. Meshing our voluntary, confidential approach with the regulatory program has some obstacles that must be overcome.</p> | <p>We do have some results of measurement through numbers reached in the 112r training. A large number of potential industries were contacted or exposed to training. (This also included staff training.) We will have some follow-up as plans are submitted. This will allow us to go a step further in measurement. We have been tracking one-on-one contacts, but not necessarily by SIC code and have not been successful in directly relating our efforts to program goals.</p>   |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS   | RESULTS OF MEASUREMENT PROCESS   |
|---------|--|--|
| ND      | One indicator of our effectiveness is the compliance status of small businesses. Since there appears to be a high level of compliance among small businesses, it would appear our assistance efforts have been successful in achieving our goals.  | No statistics have been compiled. Qualitatively, the vast majority of small businesses are in compliance.  |
| OH      | <p>Goal 1a - The distinction between 1a and 1b is a direct outgrowth of the different functions of the SBO and SBAP in OH. Due to the high quality of technical assistance provided through SBAP, SBO has chosen to focus more on general education about the degree to which environmental regulation has an impact on small businesses. In a very real sense, SBO hopes to get small businesses to ask the question, "Do I need a permit?" SBAP then can help provide the answer.</p> <p>Goals 1b and 2a - On-site assistance concentrates on determining a company's need for state permits. Each air pollution source at a company may be exempt or may require a Permit to Install, Permit to Operate, or both. During site visits, data are collected, including the number and type of sources, whether each source is permitted/unpermitted/exempt, and if SBAP assisted with a permit application. This data are analyzed to present a true picture of how much the small business currently knows about their permitting obligations and how many would be found in violation for not having permits. Through on-site assistance, the company is made aware of their permitting needs, often for the first time. In the future, SBAP will attempt to track the processing time of the permit applications that received SBAP assistance to see how much processing time is reduced.</p> <p>Goal 2b - The most straightforward indicator is the number of projects financed or receiving grants. Because that number remains low (about 10), SBO commissioned a series of focus groups to help identify barriers to reaching the small business constituency. Results of those groups currently are under review.</p> <p>Goal 3 - This was not evaluated in 1998.</p> | <p>Goal 1a - SBO has not undertaken the extensive surveying necessary to evaluate progress. Initial results from the focus groups indicate we have a long way to go, but there is no surprise in that. Within certain sectors (e.g., printing or aggregates), we have anecdotal evidence through trade associations that members exhibit a higher awareness of environmental regulations and available sources of help. We are beginning to see a slight improvement in the response of dry cleaners as a result of two recent loans to dry cleaners; both cleaners are still in business and convinced their colleagues that working with a government program is not the death knell for the business.</p> <p>Goals 1b and 2a - In visiting 149 companies in 1998, the SBAP assisted with 234 permit applications, indicating the need for businesses to understand their permitting obligations is great. 100% of companies receiving on-site assistance were made aware of their permitting requirements. Only 12% of companies were exempt from all permitting requirements, and only 18% of companies needing permits had any kind of existing permit. SBAP hopes that its findings can help the OH EPA create more permit exemptions for small sources.</p> |
| OK      | We evaluate these goals through our FOCUS document. This agreement with EPA Region VI replaces our old program goals. FOCUS outlines the individual tasks for each staff member in terms of specific tasks to accomplish our Agency goals. Individual employee performance evaluations measure whether these goals were accomplished or not.   | We believe our program is meeting the goals defined in our FOCUS document.   |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS  |
|---------|---|---|
| OR      | BAP goals are more general. We do not have a good system for evaluating the effectiveness of the program. We hope that the work of the EPA SBO/SBAP will develop a method that we can use. Technical assistance currently is tracked by the number of calls, TA on-site visits, mailings, etc., but we do not track reductions in air pollution or improvements to the environment,   | Some of the program goals are being met, as far as educating the regulated community about their environmental obligations. This is indicated by the technical assistance tracking method, originally developed for the AK DEC. This measurement system does not work as well as desired. An improved measurement system needs to be developed, but limited resources have prevented this from happening. Attendance (or lack of) at P2 classes sponsored by the SBDCs indicate that our goals are not being met. There also are fewer on-site technical assistance visits being requested than is desirable. |
| PA      | Measurement tools are being developed.  | N/R   |
| PR      | N/R   | N/R   |
| RI      | SBTCP will target the autobody industry for in-classroom training along with workshops on practicing P2 in the shop.<br><br>Completed surveys returned to our office give us an indication as to whom is still in business. Also, returned (unopened) mailings indicate who has gone out of business.<br><br>A simple head count is another way we keep track of how many industrial representatives attend specific workshops. | People respond well to teleconferences and on-site assistance when the assistance is provided by professionals who are familiar with specific industry problems. These professionals also should have experienced a trial and error approach to solving problems and know of success stories in working with the nonregulatory branch of state and federal environmental agencies.  |
| SC      | We are continuously reviewing requests for assistance to determine how many small businesses are seeking help before an actual complaint has been filed with the regulatory agency. Our goal is to reduce the number of small businesses that end up in the enforcement process.  | Measuring the achievement of our program goal is a continuous process. The objective is to minimize the number of small businesses that end up in the enforcement process.  |
| SD      | Track the number of sources that were inspected and in compliance. The performance measure is based on the percentage of sources in compliance with their air quality permits.  | Just initiated the performance measure, so it is too early to tell if the measurement system works.   |
| TN      | Subjective determination that SBAP has provided all necessary information and opportunities to affected small employers to ensure their understanding of employer obligations. Services include on-site visits upon request, workshops, satellite teleconference downlinking and sponsorship, and understandable documents provided to employers.   | We met program goals. We believe in the "customer service" concept but not in intrusive governmental involvement or oversight.  |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS  | RESULTS OF MEASUREMENT PROCESS  |
|---------|---|---|
| TX      | Measurement (compliance surveys) of industries' compliance before and after assistance is achieved through questionnaires and customer-service surveys for all hotline calls, site visits, and workshops. Future measurement goals include tracking the number of small businesses taking advantage of Supplemental Environmental Projects (towards which small businesses may apply a portion of the penalty owed under an enforcement order, which benefit the environment in the community where the violation occurred), and the number of small businesses issued default orders (issued to entities that do not respond to Notices of Violation). | <p>SBAP met its program goals of 90% year-end compliance for most industries, but fell short for others. Additional outreach will be conducted for industries in which compliance rates were below 90%, and specifically targeted to the media for which it is needed. The measurement system was successful as it showed us the industries for which outreach was successful, what types of outreach were successful, and where further outreach is needed.</p> <p>(Results of measurement process are very extensive. Please see notes section below.)*</p> |
| UT      | SBTCP provides services to small businesses through a hotline, on-site visits, seminars, etc.   | We do not have a measurement process in place to measure the goals of the program.  |
| VT      | <p>Follow-up phone calls and site visits whenever possible to record improvements made.</p> <p>Increased number of Hazardous Notification forms filed with regulatory division.</p> <p>Increase in permits issued, which are attributable to SBCAP's assistance.</p> <p>Increased number of on-site requests.</p> <p>Increased number of hotline requests.</p> <p>In general, comparing 1997 numbers to 1998 numbers across the board.</p>  | <p>VT met its program goals.</p> <p><b>Hotline calls:</b><br/> 1997-75<br/> 1998-146<br/> 51% increase in use</p> <p><b>On-site visits:</b><br/> 1997-9<br/> 1998-18<br/> 50% increase in requests</p>  |



**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS   | RESULTS OF MEASUREMENT PROCESS  |
|---------|--|---|
| VA      | <p>For this program year, the evaluation of the above goals was done on a general provision of assistance basis. This year would encompass general compliance assistance and concentrate on the final development of the program's web site, including the development of training materials in preparation for delivery of training to VA's small businesses. The targeting of specific industry sectors was confined to the beginnings of the development of concept, partnerships, and materials to provide outreach to sources affected by the provisions of 112(r), specifically propane dealers and users. Other outreach for specific rules, guidance, or P2 activity would be developed as opportunities presented themselves. Indeed, three opportunities arose in the form of downlink telecasts: "WasteWise," "Clean Air Compliance for Consumer Products," and "Using Screen Printing Technologies for Business and Environmental Success."</p> <p>Each of the above goals relies on the dissemination of information of regulatory and permitting requirements to potentially affected sources. Assistance provided to a single client, a single permit, a single untangling of confusing regulations, or productive interfaces with a trade group can provide results not necessarily captured by the parameters of the numbers found in the charts.</p> | <p>VA met its program goals. The ability to empirically measure the results of compliance assistance or P2 activity is unfortunately just as difficult as it is to define the total parameters of P2 and compliance assistance. Compliance assistance, as a very "soft sided" activity, does not always produce results that are immediate, definitive, or discernible.</p>   |
| VI      | <p>We are presently putting together a self-audit sheet. With a new Environmental Specialist on board, our site-specific compliance is in progress, and we are sending out fact sheets to the community by way of our school children.</p>   | <p>Our goals are being met. Calls from clients are positive.</p>  |
| WA      | <p>By responses from sources. By availability of SBAP services. By development of SBAP materials. By comparing ratio of notice of violation to enforcement inspections.</p>  | <p>Ratio is decreasing.</p>   |
| WV      | <p>Applications received by the Agency in which assistance was provided by the SBAP are periodically followed up in conjunction with apprising the applicant of the progress of same. Because of resource limitations, evaluations for 1998 were more qualitative than in 1997.</p>  | <p>Given the workload of WV OAQ's Permitting Section, this effort has not been as successful as we would like. However, an increase of permitting staff, coupled with an effort to streamline the state's minor source construction regulation, should result in better progress in this area. General permits also are more user-friendly and can be processed more quickly than typical construction permits. Our Coal General Permit issued 9 registrations over an 8 month period. Typical individual permits would have taken 3-4 months each.</p> |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS   | RESULTS OF MEASUREMENT PROCESS   |
|---------|--|--|
| WI      | <p>WI SBAP initiatives are built around new or emerging environmental regulations that have a significant impact on small businesses. Efforts based around regulations that have specific deadlines, such as minor source permits and 112(r) requirements, have been especially successful. Success is measured by the number of attendees at these targeted workshops and the number of calls and publications provided. Seminar evaluation forms also are used to evaluate the quality of each event. Additionally, a bi-yearly customer satisfaction survey is conducted on a representative sample of our total client base.</p> | <p>Our program has met its goal of providing assistance to small businesses affected by the CAA. Total number of businesses reached via all outreach efforts exceeded 5,000.</p> <p>Bi-annual survey results of clients for 1998:</p> <p><b>90% of customers surveyed would recommend the small business clean air assistance program to others.</b></p> <p><b>91% of customers surveyed said they have a better understanding of the air quality regulations that apply the their business.</b></p> <p><b>41% of respondents report they have been able to reduce the amount of emissions they generate as a result of receiving assistance from the SBCAAP.</b></p> <p><b>80% of individuals attending our breakfast seminars on air permitting have a "much better understanding" of the permitting requirements.</b></p> |

**TABLE F-1  
(Continued)**

| PROGRAM | STRATEGIES TO EVALUATE GOALS   | RESULTS OF MEASUREMENT PROCESS   |
|---------|--|--|
| WY      | <p>We conducted a mail-in survey to assess our performance for 1998. The response was quite light (less than 3%), even though we provided a self-addressed, stamped return envelope. However, the responses received indicate good value in our newsletter and appreciation for the one-on-one site visits we conduct. Translating that feedback into actual improvements in environmental compliance is not possible with the limited data currently available.</p> | <p>While fairly new and still in the growing stage, our Outreach Office has made great strides in serving the small businesses in WY. Through a variety of publications, displays at public events, presentations to various groups, and one-on-one site visits, we have penetrated a large portion of the small business community in the state. Notable successes include:</p> <ul style="list-style-type: none"> <li>• <b>Provided information on environmental statutes and regulations in over 20,000 newsletters to small businesses in the state (goal 1).</b></li> <li>• <b>Offered compliance assistance and P2 initiative support to over 500 small businesses in one-on-one site visits (goal 2).</b></li> <li>• <b>Encouraged self-auditing through both policy formulation (compliance incentive rule advocated by the CAP and adopted by the Department) and education via newsletter, handout information at public displays and presentations, and in one-on-one site visits totaling literally thousands of individual contacts (goal 2).</b></li> <li>• <b>Increased the public's understanding of permitting requirements and CAA through publications, presentations, and site visits totaling thousands of individual contacts (goals 1 and 2).</b></li> </ul> <p>Hard data linking these accomplishments to improve compliance (goal 3) is not currently available. However, we believe our efforts are bearing fruit in many of the businesses we have contacted. We also are committed to working not just with the regulated community, but also with the numerous small businesses that do not require permits, but that in combination can have a significant impact of our environment. A special focus for those businesses is the use of P2 initiatives, which can benefit both the environmental performance and their business' bottom line.</p> <p>Additional data gathering and statistical analyses will be planned for 1999 to improve our ability to assess the positive impacts of our outreach efforts.</p> |

**TABLE F-1  
(Continued)**

\*Notes

**Texas**

**Site Visit Program** - Site visits were conducted for 177 small businesses in 1998. Baseline and year-end compliance figures, compliance increases, and number of site visits for specific industries were as follows:

| Industry         |       | Baseline Compliance % | Year-end Compliance % | Compliance Increase % | # of Visits     |
|------------------|-------|-----------------------|-----------------------|-----------------------|-----------------|
| Auto Repair      | air   | 91.2                  | 95.7                  | 4.6                   | 48              |
|                  | waste | 68.2                  | 94.4                  | 26.3                  |                 |
| Dry Cleaners     | air   | 78.0                  | 96.1                  | 18.1                  | 36              |
|                  | waste | 83.0                  | 98.2                  | 15.2                  |                 |
| Auto Body        | air   | 92.4                  | 96.8                  | 4.4                   | See auto repair |
|                  | waste | 74.7                  | 93.8                  | 19.0                  |                 |
| Foundries        | air   | 94.4                  | 100.0                 | 5.6                   | 7               |
|                  | waste | 65.4                  | 80.0                  | 14.6                  |                 |
| Other Industries | air   | 69.7                  | 85.4                  | 15.8                  | 46              |
|                  | waste | 66.0                  | 88.3                  | 22.3                  |                 |
| All Industries   | air   | 78.4                  | 90.0                  | 11.6                  | 177             |
|                  | waste | 70.1                  | 90.0                  | 19.9                  |                 |

Surveys taken after the site visits found small businesses had made significant changes based on the consultant's recommendations. Site visits also spurred more small businesses to recycle and use environmentally friendly solvents and in turn reduce waste and cut disposal costs.

**TABLE F-1  
(Continued)**

**Hotline** - Baseline and year-end compliance figures, compliance increases, and number of calls for specific industries were as follows:

| Industry         |       | Baseline Compliance % | Year-end Compliance % | Compliance Increase % | # of Calls Received |
|------------------|-------|-----------------------|-----------------------|-----------------------|---------------------|
| Auto Body        | air   | 61.3                  | 90.7                  | 29.4                  | 361                 |
|                  | waste | 59.7                  | 97.4                  | 37.7                  |                     |
| Metal Finishers  | air   | 35.0                  | 50.0                  | 15.0                  | 166                 |
|                  | waste | 69.7                  | 96.6                  | 26.9                  |                     |
| Other Industries | air   | 51.9                  | 87.4                  | 35.5                  | 130                 |
|                  | waste | 47.6                  | 88.0                  | 40.5                  |                     |
| All Industries   | air   | 55.2                  | 82.6                  | 27.4                  | 1,865               |
|                  | waste | 52.3                  | 90.4                  | 38.1                  |                     |

**TABLE F-1  
(Continued)**

**Workshops** - SBAP gave 35 workshops in 1998 on topics including metal finishing, auto body and auto service, chemical coaters, printers, dry cleaners, and RCRA waste recordkeeping. Attendance at all workshops totaled over 1,391 people. Baseline and year-end compliance figures, compliance increases number of workshops offered, and workshop attendance for specific industries were as follows:

| Industry        |       | Baseline Compliance % | Year-end Compliance % | Compliance Increase % | # Offered       | Attendance |
|-----------------|-------|-----------------------|-----------------------|-----------------------|-----------------|------------|
| Auto Repair     | air   | 72.0                  | 85.2                  | 13.2                  | 12              | 287        |
|                 | waste | 73.4                  | 90.2                  | 16.8                  |                 |            |
| Dry Cleaners    | air   | 56.0                  | 87.2                  | 31.1                  | 4               | 74         |
|                 | waste | 70.8                  | 87.8                  | 17.0                  |                 |            |
| Auto Body       | air   | 72.9                  | 94.4                  | 21.5                  | See auto repair |            |
|                 | waste | 78.6                  | 90.7                  | 12.1                  |                 |            |
| Printers        | air   | 25.9                  | 55.6                  | 29.6                  | 2               | 38         |
|                 | waste | 48.6                  | 71.4                  | 22.8                  |                 |            |
| Metal Finishers | air   | 41.2                  | 57.1                  | 16.0                  | 2               | 28         |
|                 | waste | 78.9                  | 87.0                  | 8.1                   |                 |            |
| All Industries  | air   | 65.0                  | 83.5                  | 18.5                  | 35              | 1,391      |
|                 | waste | 73.3                  | 88.2                  | 14.9                  |                 |            |

**TABLE F-2**  
**SIGNIFICANT PROGRAM ACCOMPLISHMENTS, AWARDS, AND RECOGNITIONS**

| PROGRAM         | ACCOMPLISHMENTS  |
|-----------------|--|
| Alabama         | N/R  |
| Alaska          | <p>SBAP mailed <b>postcard reminders</b> to small businesses that have a general permit or pre-approved limit (PAL) in early January 1998. By using postcards instead of formal letters, the SBAP was able to save staff time, postage, and Department materials. This format was very successful in informing the small businesses affected by the air quality laws to maintain compliance and avoid costly enforcement actions. Selected feedback includes:</p> <ul style="list-style-type: none"> <li>• Timely reporting - A Juneau dry cleaner called and received assistance after getting the postcard. He was very thankful for the reminder. He stated that there were so many forms and reports due (sales tax, quarterly taxes) and that he had forgotten to add the air reporting requirements to his list of forms that must be filled out. He also wanted to have a reminder sent in July for the next report. This is a typical response by permit holders to the postcard reminder that was sent out.</li> <li>• Cost reductions - A few facilities were delinquent in responding to requests to update their general permit applications. Through the postcard, those facilities were given a hand-written reminder that their air permit application was still incomplete. This allowed them to avoid the cost associated with potential enforcement measures. The SBAP was able to get 5 facilities to complete their applications and receive their air general permit.</li> <li>• Communication - Some of PAL holders needed both assistance in filling out the form as well as getting the reports completed. SBAP worked closely with the Air Quality Maintenance Compliance Assurance Section to ensure that PAL holders returned their reports on time.</li> </ul> |
| Arizona         | N/R  |
| Maricopa County | <p>The Compliance Incentive or time-limited (90 days) <b>amnesty program</b> was a success. We received over 275 calls and visited over 20 sites. Of those, 12 obtained an air quality permit. This "leveled the playing field" and also generated revenue.</p> <p>A team of several individuals from MCESD revamped our <b>home page</b> for easier navigation and a cleaner look.</p> <p><b>Direct mailings and using the Internet to find sources</b> have been very helpful.</p> <p>Approximately 232 attended the <b>dust course</b> in 1998, and we anticipate 100-130 participants in 1999.</p> <p>We continue to receive <b>referrals from inspectors and permit reviewers</b> to assist businesses in completing their air quality application.</p>   |
| Arkansas        | <p>The small business program is performing some excellent work on a <b>one-on-one</b> basis. Extensive use is being made of <b>retired engineers</b> from the business sector. <b>Technology transfer grant funds</b> through the AR Science and Technology Authority are being used to provide more in-depth engineering support. Maximum project level is \$5,000 with Science and Technology Authority providing \$3,750 and the business client providing \$1,250. The <b>revolving loan fund</b> is primarily being used to comply with underground storage tank regulations. The loan fund is limited to \$10,000 and \$15,000 loans with an interest rate at only 80% of the published national "prime" lending rate.</p>  |

**TABLE F-2  
(Continued)**

| PROGRAM    | ACCOMPLISHMENTS   |
|------------|---|
| California | <p>SBO maintains a customer assistance <b>hotline</b> (1-8000-ARB-HLP2) and e-mail helpline (helpline@arb.ca.gov) for those who need information about the ARB's programs and services referral help with the environmental regulatory process. SBO responded to over 1,000 helpline calls and over 1,000 e-mail inquiries in 1998.</p> <p>ARB initiated a facilitated <b>workshop</b> with the CA Trade and Commerce Agency to improve small business access to financial resources to help achieve compliance with environmental regulations and P2 activities. Participants included 50 individuals from small business, private and governmental financial lenders, and financial and environmental assistance providers. They agreed to move forward on the development of a private/public working group to determine how to implement the recommendations of the workshop participants.</p> <p>SBO initiated, coordinates, and supports the <b>CAPCOA/ARB Business Assistance Committee</b>. In 1998, the Committee provided an ongoing opportunity for representatives of business assistance programs to partner with the business community to assess needs, exchange ideas, and strengthen business assistance programs. Committee activities include developing and maintaining a business assistance clearinghouse, marketing business assistance programs and providers, promoting communications among various business assistance organizations and the business community, and encouraging involvement of the business community in developing and implementing business assistance programs.</p> <p>SBO participates with US EPA and state SBOs/SBAPs to <b>foster communication among states and EPA</b> to improve business assistance programs. The Office represents CA in the SBO/SBAP Steering Committee and participates in planning the annual conference.</p> <p>SBO participates in <b>Cal/EPA's Ombudsman Forums</b>, which provide stakeholders with legislative, regulatory, and program updates, and are especially useful to businesses seeking information on permitting and compliance with air quality requirements.</p> <p>SBO tracks each <b>regulatory workshop</b> and assesses the sufficiency of the outreach efforts. The Office tracked over 40 regulatory items in 1998 that involved over 800 workshops, meetings, and conference calls. Key items included the modification of the LEV/ZEV regulation, adoption of jet ski and personal watercraft regulations, Board consideration of the City of Los Angeles' appeal of the Owens Valley PM10 Plan, and the identification of particulate emissions from diesel-fueled engines as a toxic air contaminant.</p> <p>SBO evaluates <b>survey results</b> and presents them to division staff for use in improving the regulatory process. The Office also incorporates survey results into a performance measure in ARB's strategic plan.</p> <p>SBO worked with ARB staff and CA Air Pollution Control Officers Association management to develop the December 1998 report, "<b>Stakeholder Visions for the Future of California Air Quality Management</b>," which describes the results of strategic planning forums held in 1996 and 1997.</p> <p><b>Strategic planning visioning forum</b> was held in February 1998 to get feedback from industry, environmental groups, and local air districts on lessons learned and future challenges to CA's air program. The SBO developed a "<b>How Are We Doing?</b>" <b>survey</b> for administration to a broad cross-section of stakeholders.</p> <p>SBO developed an outreach binder, "<b>California's Clean Air Successes and Future Challenges</b>," which documents the historical success of CA's air quality programs, in order to earn continued public support for future efforts.</p> |



**TABLE F-2  
(Continued)**

| PROGRAM              | ACCOMPLISHMENTS  |
|----------------------|--|
| South Coast, CA      | <p>The <b>automated business client tracking system</b> will be used as a prototype in other customer assistance programs. Other SBAPs have expressed interest in designing a system similar to ours for tracking.</p> <p>We have had a tremendous response from the local building and safety department from our <b>outreach on permitting clearances</b>. Because of their frequent staff turnover and lack of awareness of our air quality permit requirements, we need to constantly reinforce these relationships.</p>   |
| Colorado             | <p>SBO program has <b>partnered with the Office of Customer Service's Environmental Customer Assistance Center</b> to assist businesses with all aspects of compliance.</p> <p>SBAP is working to create <b>program effectiveness tracking</b> methods in 1999.</p>  |
| Connecticut          | <p>In June 1998, SBAP was moved into the Commissioner's Office to coordinate <b>multimedia compliance assistance</b> efforts. While the Office is still dealing predominantly with small business activities, other activities and responsibilities also have been included.</p>   |
| Delaware             | N/R  |
| District of Columbia | N/R  |
| Florida              | Developed dry cleaners' compliance assistance <b>calendar</b> .  |
| Georgia              | <ul style="list-style-type: none"> <li>• In 1998, we received the Director's commitment to provide <b>multimedia assistance</b> to small businesses.</li> <li>• SBAP published 4 <b>newsletters</b> during 1998. <i>The Small Business Advocate</i> has a circulation of 13,000.</li> <li>• SBAP updated the Program's <b>brochure</b> (last update 1994).</li> <li>• SBAP published <b>articles</b> in <i>The Georgia Outreach, Management Update, and Shared Services</i>.</li> <li>• Developed an informal mechanism for the <b>regional office and enforcement programs to refer small businesses</b> to us for assistance.</li> <li>• SBAP revamped our <b>web page</b> and placed it in a more prominent location.</li> <li>• Governor's <b>appointees to the CAP</b> were sworn-in at the state capital in August.</li> <li>• <b>SBAP, CAP, and SBO met</b> 4 times in 1998.</li> <li>• For the first time, SBO, SBAP coordinator, and a CAP member <b>attended the annual SBO/SBAP conference</b>.</li> <li>• SBAP coordinator represented the Region IV states at the <b>4th annual Small Business Liaison Conference</b> in Washington, DC.</li> <li>• SBAP <b>presented information on the SBAP, CAA, and P2</b> to the Air Branch's new employees during their orientation.</li> <li>• SBAP staff attended the <b>Region IV conference</b> in Biloxi, MS.</li> </ul> |
| Hawaii               | <b>Dry cleaning technical assistance program</b> (statewide) was designed and established with the concurrence and support of industry.  |
| Idaho                | During 1998, greater emphasis was placed on business assistance -- <b>small business assistance</b> in particular. Agency support has grown tremendously.  |

**TABLE F-2  
(Continued)**

| PROGRAM  | ACCOMPLISHMENTS   |
|----------|---|
| Illinois | <ul style="list-style-type: none"> <li>• <b>Clean Tech 98 Parts Cleaning Expo.</b></li> <li>• <b>Town Hall meetings.</b></li> <li>• <b>Rotary Club meeting</b> - general information about compliance.</li> <li>• We have continued to try to maximize resources by <b>establishing and building partnerships</b> with both the regulators and business community. We have worked on steering committees for the <b>Great Printers Project, Greater Chicago P2 Project, and IL Gold Star Dry Cleaner Project.</b></li> <li>• We implemented a <b>pilot project</b> combining resources of SBAP, IEPA Office of P2, SBDCs, Procurement Technical Assistance Center, and Manufacturing Extension Center. Companies can receive P2 assessments free of charge from a graduate student intern.</li> <li>• <b>Greater Chicago P2 Project</b> includes local, state, and federal assistance and regulatory programs plus some business organizations. In a cooperative effort, SBAP developed a directory of programs that may be able to assist companies in the Chicago area. We continue to use private industry as an effective marketing tool and partner in assistance efforts.</li> <li>• We are attempting to find financial resources to provide multimedia assistance.</li> </ul> |
| Indiana  | <p><b>Wood Furniture</b> -- Currently involved in the development of a <b>multimedia pilot</b> project for this industry. Wood furniture is one of IN's first industries to receive multimedia inspections. Several other industry sector multimedia projects are in the works including metal finishing, pharmaceuticals, and electric utilities.</p> <p><b>Vehicle Maintenance</b> -- Developed a <b>compliance manual</b> that includes environmental, OSHA, and fire and building services regulations. Conducted 8 workshops throughout the state and made presentations at several trade association meetings.</p> <p><b>Mercury &amp; Steel Mills</b> -- In a cooperative effort between US EPA, IDEM, and the steel mills, 3 northern IN steel mills are identifying areas where mercury is located and establishing programs to get mercury out of the steel mills in the next year.</p> <p><b>Mercury Awareness Program</b> -- In October 1998, IDEM and the IN Regional Household Hazardous Waste Task Force offered free recycling of household mercury in every IN county. More than 2,100 pounds of mercury were collected, preventing mercury from reaching IN's air, rivers, lakes, or streams.</p>   |

**TABLE F-2  
(Continued)**

| PROGRAM | ACCOMPLISHMENTS   |
|---------|---|
| Iowa    | <p>We had a <b>multimedia</b> program in place even before the air program started. The IWRC multimedia program and the IAEAP (SBAP) complement each other, provide clients with "one stop shopping" services, and makes what we have to offer very attractive. In the past year, we were and are involved with the following projects, in addition to the core program services:</p> <ul style="list-style-type: none"> <li>• Updated the <b>1998 Resource Guide</b> (funded by US EPA) and made it available on-line with search capabilities (<a href="http://www.iwrc.org">www.iwrc.org</a>). The Guide was mailed to all SBO/SBAP programs.</li> <li>• Received SBREFA grant to develop an <b>environmental regulatory handbook for agricultural businesses</b> covering both state and federal regulations. This is a work in progress.</li> <li>• Completed an IDNR-funded project to find how many and what type of <b>businesses may be affected by 112(r)</b> in IA. Our study determined that 112(r) would potentially impact about 4,000 businesses in IA; EPA estimated the number to be about 1,800. This study and resulting database are being used to provide additional 112(r) assistance.</li> <li>• Developed <b>industry-specific spreadsheet-based emission estimation programs</b> to generate emission inventories and estimates for permit applications. Input data are collected from small businesses using a 2-4 page industry-specific questionnaire. The IAEAP has developed programs for small manufacturing operations, dry cleaning facilities, printers, and grain handling facilities. These programs are continuously updated.</li> </ul> |

**TABLE F-2  
(Continued)**

| PROGRAM          | ACCOMPLISHMENTS  |
|------------------|--|
| Kansas           | <p>In 1998, KDHE officially expanded the technical assistance program to <b>multimedia</b> by funding the program. In the past, although the program really was multimedia, funds were provided primarily by air fees. This year, the P2 program and the SBEAP program were officially combined with one contract and multiple sources of funding through KDHE. We feel that this reorganization has benefitted businesses, since it is less confusing to them.</p> <p>Examples of comments include:</p> <ul style="list-style-type: none"> <li>• The services offered by the Pollution Institute (SBAP) are essential to small industries in rural Kansas. Without the assistance of these types of programs, it would be extremely difficult for a business of our size to stay in compliance with federal law and KDHE regulations. Your diligence in helping us function within these laws and regulations is very much appreciated.</li> <li>• Excellent cooperation.</li> <li>• This is a great program. [Tim and Sherry] helped us face problems that we wouldn't have tackled alone. Because of them we are more focused on environmental issues - without being fined!</li> <li>• Thanks [this is] very helpful.</li> <li>• Both [Tim and Jean] were very helpful and very professional. I enjoyed working with both! I would not hesitate to call if or when I need further assistance.</li> <li>• The help that we received has been excellent. This Pollution Prevention Institute [SBAP] is priceless for small companies like ours.</li> <li>• I don't think the report could have been done any better. [Jean and Sherry] did an excellent job of inspection and recommendations. Anything that they weren't sure of, they found out about and they were able to work as a go-between for us and KDHE, making it possible to get some straight answers from KDHE.</li> <li>• Great job. Thanks for the help.</li> <li>• This is a great program. Keep up the good work.</li> <li>• Excellent resource material made available, and [Tim] was very helpful.</li> </ul> |
| Kentucky         | <p>During 1998, the SBSSCAP gave its first annual <b>Small Business Air Quality Stewardship Awards</b>, which were presented by Lt. Gov. Stephen Henry, MD, at a luncheon at the Lt. Gov's Mansion. The award program has generated good will and publicity for all participants.</p> <p>SBAP director is routinely invited to share his experience and insights on compliance assistance, partnering efforts, and educational programs at <b>state and national meetings</b>. In 1998, these events included SBO/SBAP conferences, National P2 Roundtable meetings, Association of Small Business Development Centers annual conference, Air and Waste Management Association meeting, KY SBDC directors' meeting, Chamber of Commerce environmental activities, and others.</p>  |
| Jefferson County | N/R  |
| Louisiana        | <p>One of our engineers was awarded the <b>LDEQ Customer Service Award</b> in December 1998.</p> <p>We went to the <b>LA Universities' Marine Consortium (LUMCON)</b> in Cocodrie, LA for a 3-day strategic planning session to prepare for re-engineering and multimedia.</p>   |
| Maine            | The ME SBTAP is fully <b>multimedia</b> .  |

**TABLE F-2  
(Continued)**

| PROGRAM       | ACCOMPLISHMENTS  |
|---------------|--|
| Maryland      | <p>The P2 program made arrangements for the <b>Mobile Outreach for Pollution Prevention (MOPP)</b> from the IA Waste Reduction Resource Center to visit two locations in Baltimore. The MOPP is a customized motorhome containing P2 information and demonstrations for the automotive service industries. Auto body shops and repair facilities in Baltimore City, Baltimore County, and Anne Arundel County were invited to attend the demonstrations. EPA also attended the demonstrations.</p> <p>MDE promotes the <b>Businesses for the Bay program</b>, a voluntary P2 program that provides recognition for businesses and other organizations that implement P2 programs. Businesses for the Bay also has a mentoring program with more than 70 individuals from various industries offering free P2 assistance. This program won two national awards in 1998, one from the National P2 Roundtable and one from the National Environmental Education and Training Foundation.</p> <p>MDE developed and published the <b>Business Guide to Environmental Permits and Approvals</b>, which lists information for all permits, approvals, and licenses issued by the Department. This document is very useful to businesses and is available on the MDE web site.</p> |
| Massachusetts | <p>Increasing <b>interaction with enforcement agencies</b> has improved the referral process. OTA increasingly involved in post-enforcement actions, which helps incorporate P2 into enforcement. Enforcement agencies are taking more advantage of OTA's services, which are available to them as well as to industry. As long as we maintain our image of service provider to industry, there is no bar to working with the enforcement agency.</p>  |
| Michigan      | <p>SBO - none.</p> <p>SBAP - <b>Trained more than 1,800 business</b>, industry, regulatory, and consulting personnel during 1998 at <b>18 workshops</b> held statewide. SBAP also provided a number of presentations to business, industry, and government personnel in 1998, attracting a listening audience of over 1,274 at <b>15 engagements</b>. The technical service provided or customer service displayed is reflected in 9 letters of appreciation that were written by either industry or other state government agencies commending SBAP staff on the excellent level of technical assistance (information and service) that was provided.</p>   |

**TABLE F-2  
(Continued)**

| PROGRAM     | ACCOMPLISHMENTS  |
|-------------|--|
| Minnesota   | <p><b>The Small Business Environmental Improvement Loan Program</b> has made more than 25 loans that collectively amount to over \$890,000. These loans have helped the businesses make significant environmental improvements in their operations while giving money back to the loan program through principal and interest payments. The program has had zero defaults, allowing the revolving fund to grow and offer loans to other businesses.</p> <p>SBAP successfully coordinated with other external service delivery providers to develop an <b>environmental guide for small businesses</b>. The free guide includes comprehensive multimedia information on all environmental regulations with which all small businesses need to comply.</p> <p>SBAP successfully created, maintains, and distributes the <b>"Small Business Enterprise,"</b> a <b>quarterly newsletter</b> for the small business community. This newsletter has been well received and has been an effective tool for communicating information to businesses and for marketing the program.</p> <p>SBAP produced and distributed a <b>video tape on the use of aqueous finishes for the wood finishing industry</b>.</p> <p>SBO and SBAP were part of an agency-wide reorganization from a traditional media-based structure to a <b>multimedia/geographic-based organizational structure</b>. The reorganization also includes a sector-based approach. SBO and SBAP have been assigned to work in the regular facilities sector and have been given the opportunity to expand the program into a multimedia format.</p> |
| Mississippi | <p>Our program has made the move to <b>multimedia</b>, and it is working well. Customers expect us to have knowledge in all areas. By our multimedia efforts, customers have one point of contact to get a variety of questions answered.</p>  |
| Missouri    | <p>The <b>P2/Compliance Guides</b> have been well received by industry. The guides are written in an easy-to-understand format providing the information necessary for the facility to comply with regulations, but also providing P2 opportunities and ideas.</p> <p>The <b>On-site Assessment Team</b> is visiting many facilities across the state, and their services have been well received. Facilities visited receive a comprehensive, yet easy to understand report illustrating the areas that need improvement and the areas where they are in compliance. The report also includes P2 tips and opportunities.</p> <p>The regulatory programs have commented that when a facility submits an application for a permit or other required documentation that the Technical Assistance Program has helped them to complete, the application or document takes much less time to review and process.</p>  |
| Montana     | <p>SBO/SBAP created the <b>Small Business and Tribal Energy and Environmental Loan Program</b> in 1998 and has extended over two dozen loans to service stations, auto body shops, and small manufacturers for the purchase of energy efficient and P2 equipment.</p> <p>SBO/SBAP expanded by one full time employee and now offers <b>multimedia assistance</b> to small businesses.</p> <p>Mark Lambrecht, SBO/SBAP Manager, was awarded the <b>1998 MT Governor's Award for Excellence</b> for his role in resolving a dispute between a small business and its neighbors and for creating the loan program.</p>  |

**TABLE F-2  
(Continued)**

| PROGRAM       | ACCOMPLISHMENTS   |
|---------------|---|
| Nebraska      | SBAP progress is seen in the development of an ever increasing <b>network of partners and peer exchange businesses</b> . Large businesses and consulting firms are taking a more proactive role in working with small businesses to expand the assistance outreach. The NE DEQ created a new division to better serve its customers. The Customer and Technical Assistance Division includes the Pollution Prevention Coordinator, Community Right-to-Know person, SBAP, NE Mandates Management Initiative, and the Grants and Planning Unit.   |
| Nevada        | SBAP has been <b>multimedia</b> since inception. Administration's position was that staff should provide such assistance for all types of environmental programs and issues. SBAP staff were instrumental in <b>web site development</b> and getting the site online.   |
| New Hampshire | <p>The Program continues to be well received by the small business community. An ever increasing majority of referrals for technical assistance are through conversations between business owners. This is primarily due to the conscious attempt by Program staff to break down the barriers of mistrust that often exist between business owners and regulatory agencies.</p> <p>Through <b>public and private partnerships</b>, we are making great strides in getting business owners to realize that environmental compliance does not necessarily mean economic costs. An example of this "new" attitude was evident during a recent on-site visit conducted by the Program where the business owner noted that he was informed by a DES inspector that acetone storage containers needed to be covered at all times unless product was being added or removed. The business owner told me that by conforming to this regulation, he had reduced his acetone purchases by over 50%.</p> |
| New Jersey    | <p>SBAP serves on <b>EPA's National ChemAlliance advisory board</b>.</p> <p>SBAP worked in conjunction with EPA, trade/business groups, and chemical manufacturers on the <b>NJ Chemical Industry Project</b>, which developed compliance assistance materials for medium and small businesses both in hard copy and online (through a new web site).</p>   |
| New Mexico    | N/R   |

**TABLE F-2  
(Continued)**

| PROGRAM        | ACCOMPLISHMENTS  |
|----------------|--|
| New York       | <p>Considering its small staff size, SBAP provided a significant volume of technical assistance to small businesses in New York State. SBAP provided off-site assistance via the <b>hotline</b> to over 100 small businesses and their support groups per month, conducted <b>17 air audits</b> and completed <b>66 state facility permits and registrations</b>.</p> <p>SBEO handled about twice as much volume as it did in 1997 with the same staffing level. SBEO provided hotline assistance to an average of 60 small businesses per month and completed an average of 6 ombudsman cases per month.</p> <p>SBAP generated significant volume of <b>technical outreach materials</b> in 1998 that are well received by businesses: 10 fact sheets describing compliance options for halogenated solvent degreasers, one fact sheet for capping operations for sources with PTEs above major thresholds, 10 generic compliance plans for New York State dry cleaners (by equipment type and facility location), and two issues of the program newsletter, <i>Clean Air News</i>, mailed to over 4,000 per edition. SBAP also developed a database of environmental consultants by geographic area and by expertise. A survey of companies audited is planned.</p> <p>Together, the SBEO and SBAP <b>reached about 5,000 more small businesses than it did in 1997 (a 25% increase) and provided direct assistance via the hotline and on-site audits to about 400 more small businesses than in 1997 (a 20% increase).</b></p> <p>SBEO received an <b>Award of Excellence</b> from the New York State Library Association for the production of the Environmental Audit Guide for Small Business.</p> <p>SBAP and SBEO continue to receive letters and comments of appreciation from small businesses.</p> |
| North Carolina | <p>One of the primary accomplishments this year was to <b>strengthen our links</b> with the Department of Commerce and local economic developers and to <b>improve our multimedia response</b> capability. As an appointed Departmental Permit Team Coordinator, I worked with all permitting agencies and business representatives to facilitate a new company's understanding of environmental requirements. While the business assisted was not a small business, the contacts, knowledge of requirements and processes are very transferable to small businesses. Also served on a number of work groups to develop better communication and coordination on permitting and other environmental requirements. The results will be a department-wide customer service center, which will be located with this office.</p> <p>Our <b>cooperative venture with air quality</b> to develop training for potentially affected sources of 112(r) was an important accomplishment toward better liaison with our air quality regional staff and to introduce our services to a number of unpermitted sources.</p>   |
| North Dakota   | Nothing outstanding to mention.  |
| Ohio           | <p>SBAP played a significant role in implementing <b>OH EPA's non-Title V fee system</b>. The SBAP was part of a hotline pool designed to help companies estimate their emissions and complete their fee reports.</p> <p>SBAP supervisor was temporarily reassigned as the Manager of the Mobile Sources Section from October 1997 to August 1998 and an SBAP specialist left for other employment in July 1998. SBAP effectively operated with only three people throughout 1998 and without a supervisor for ten months.</p>   |



**TABLE F-2**  
**(Continued)**

| <b>PROGRAM</b> | <b>ACCOMPLISHMENTS</b>   |
|----------------|--|
| Oklahoma       | We believe we have continued to pioneer the <b>simplification of rules</b> for small businesses. In particular, the SBAP staff has worked with the air quality division staff to ensure that any new rules passed or the revision of existing rules is done in a manner that is not overly burdensome to the small business community and accurately reflects what is best for them and for our agency.  |
| Oregon         | None.  |
| Pennsylvania   | As of December 1, 1998, the technical assistance program known at AIRHELP expanded to include solid waste, hazardous waste, P2, energy efficiency, and environmental management systems as well as air quality. The new program is called <b>ENVIROHELP</b> .<br><br>Legislation was passed creating the <b>Small Business Pollution Prevention Assistance Account</b> , which is a revolving loan fund that will finance P2 and energy efficiency projects.   |
| Puerto Rico    | SBO has taken a more active role on the SBTCP. A <b>cooperation agreement</b> between Environmental Quality Board and Commercial Development Administration was signed in December. The agreement will combine funds to operate the SBAP and SBO, increasing the participation of Commercial Development Administration and its contacts in the small business community to raise awareness of environmental regulations. The results of this agreement will be seen during the next reporting period.   |
| Rhode Island   | Participated in an <b>international technology transfer workshop</b> by hosting a delegation of environmental experts from China. The group (through translators) learned about the regulatory process to control and prevent air and water pollution in RI, and nonregulatory assistance programs to help industry comply with environmental regulations.<br><br>URI professor Eugene Park (Center for Pollution Prevention) received EPA <b>Region I's Environmental Merit Award</b> for his P2 work with various manufacturing industries in RI. Industries that Dr. Park has worked with include seafood processing, electroplating, and nickel plating. |
| South Carolina | N/R  |
| South Dakota   | N/R  |
| Tennessee      | Satellite <b>teleconference</b> downlinking: consumer products, printers.<br><br>Division of Community Assistance <b>multimedia</b> support.<br><br><b>Workshop manuals.</b><br><br>SBO support of EPA's <b>RTP education and outreach</b> group.<br><br><b>112(r) workshops.</b>  |
| Texas          | <b>Site Visit Program</b> - To provide better service to small businesses and to leverage our resources to gain the maximum effort for our dollar, TX SBAP initiated the Site Visit Program. We are able to provide free, confidential site visits to small businesses by contracting with a private environmental consultant. Site visits were requested by over 177 small businesses in FY98.  |

**TABLE F-2  
(Continued)**

| PROGRAM       | ACCOMPLISHMENTS   |
|---------------|---|
| Texas (cont.) | <p>Surveys taken after the site visits found small businesses had made significant changes based on the consultant's recommendations. The program's overall result was a significant increase in compliance. Baseline compliance with air regulations for all industries averaged 78.4% and air regulations averaged 70.1%. Year-end compliance with air regulations increased by 11.6% to 90%, and compliance with waste regulations increased by 19.9% to 90%. For example, waste regulation compliance among automotive repair facilities increased by 26%, while compliance by autobody shops increased by 19%. Site visits also spurred more small businesses to recycle and use environmentally friendly solvents and in turn reduce waste and cut disposal costs.</p> <p><b>EnviroMentor Program</b> - Matches volunteer environmental professionals with small businesses that need compliance assistance. EnviroMentors provide free, on-site, confidential assistance including identifying areas of noncompliance, suggesting ways to cut costs, and assisting with permit applications. In 1998, 8 businesses were reached with 120 hours volunteered. Volunteers saved small business owners over \$7,050 through voluntary assistance. In 50% of the matches, volunteers assisted businesses with hazardous waste management. Other areas of assistance included above ground storage tanks, stormwater permits, Voluntary Cleanup Program, and exemption from air permitting.</p> <p><b>Star Program</b> - A grant from the TX Natural Resource Conservation Commission kicked off the state's first training course in the Spray Techniques Analysis Research (STAR) program. Developed by the IA Waste Reduction Center, STAR teaches participants how to use spray painting equipment in an environmentally friendly manner. STAR students learn an efficient method that reduces the amount of spray paint going into the air instead of on the vehicle, which also reduces VOC emissions that contribute to ground level ozone. Students learn how to reduce pollution, cut costs for the disposal of hazardous paint wastes, and gain a new skill that strengthens their employment opportunities. TNRCC won a second place award from the National P2 Roundtable's 1998 Most Valuable Pollution Prevention Program.</p> <p><b>Foundry Initiative</b> - A new SBAP outreach effort, the foundry initiative, was created to inform foundry operators about environmental laws. In FY97 and 98, SBAP staff conducted workshops and site visits, and developed a self-audit checklist for foundry operators. These efforts resulted in compliance increase for foundries: air compliance shot up from 52% to 93% while waste compliance rose from 68% to 75%. Key to the initiative was promoting the reuse of foundry sand for the TX Department of Transportation road and highway projects. Collaboration among the TNRCC, EPA, TXDOT, foundry associations, and the TX Manufacturing Association Center made the initiative a success.</p> <p><b>Consolidation of Compliance Assistance Offices</b> - Help for small business should be enhanced following the new merger of three assistance programs at TRNCC. The SBAP has merged with the Regulatory Assistance section (local government assistance and education and outreach programs) and the Office of Pollution Prevention and Recycling. The merger creating the new Office of Small Business and Environmental Assistance, which will be completed by September 1, is a result of a review of the agency's business processes conducted in October 1997 by TechLaw, a consulting firm.</p> <p>The new division will not only continue to offer free, confidential technical assistance and services to small businesses, it also will enhance P2 and education efforts and remain independent of TNRCC's enforcement program. Small businesses are ensured a voice in the rulemaking process through the Rule Review Committee, Small Business Advisory Groups, and the CAP. The new division will continue to seek small business input in the design of agency guidance documents, reporting forms, and applications through the Statewide Plain Language Committee. Twenty of the positions in the new division will be moved to regional offices around the state, increasing Texans' access to TNRCC staff and services.</p> |

**TABLE F-2  
(Continued)**

| PROGRAM       | ACCOMPLISHMENTS  |
|---------------|--|
| Texas (cont.) | <p><b>Small Business Enforcement Tracking Report</b> - The first tracking report was completed in September 1998. The report's purpose is to identify common environmental trends and problems experienced by small businesses. A summary of data collected from FY96 to FY98 identified enforcement issues for small businesses and included the following:</p> <ul style="list-style-type: none"> <li>• Most enforcement orders are issued to small businesses.</li> <li>• The percentage of enforcement orders issued to small businesses increased.</li> <li>• The average penalty for small businesses increased.</li> <li>• The number of default orders (enforcement orders that companies do not respond to) increased from 5 in FY96 to 68 in FY98.</li> <li>• 91% of default orders issued in FY98 were to small businesses.</li> </ul> <p>The report also notes that small businesses have participated in fewer Supplemental Environmental Program (SEP) options than large businesses. SEPs are an alternative method of paying penalties through community projects.</p> <p>The Office of Small Business and Environmental Assistance (SBEA) will use the tracking report to improve outreach, help small businesses achieve compliance, and meet its goal of minimizing enforcement issues in the small business community. SBEA has made the following recommendations: revise the automatic enforcement referral criteria, allow a one-year inspection exemption to small businesses that participate in the SBEA site visit program, promote SEPs, rewrite the TNRCC enforcement letters for clarity, and get other TNRCC programs to begin tracking small businesses and their specific types of violations. SBEA is drafting an enforcement process fact sheet that will be attached to the Notice of Violation and Notice of Enforcement letters and will be distributed by inspectors during visits. The fact sheet will explain the enforcement process and the actions required by a business that is under enforcement. With a better understanding of the enforcement process, the business has a greater chance of reaching compliance.</p> <p><b>Grant Received to Conduct Site Visits for Border-area Small Businesses</b> - TNRCC received a \$50,000 grant from US EPA to offer site visits through August 1999 in border communities from El Paso to the Lower Rio Grande Valley. This grant will fund approximately 33 site visits including an initial visit and a follow-up visit.</p> <p><b>Metal Finishers Common Sense Initiative, now the Strategic Goals Program</b> - An SBAP staff member participated in the initiative, which involved quarterly meetings between EPA, POTWs, and the metal finishing industry about how all parties can work together to reduce pollution and improve the industry's compliance status. The meetings provided a beneficial forum for networking with other compliance assistance/enforcement staff to share outreach information.</p> <p><b>SBREFA Grant</b> - SBAP received this grant to work with Southwest Texas State University (SWT) to develop a stormwater regulatory fact sheet and an initiative for the chemical preparation industry. SWT researched stormwater rules and compiled a draft fact sheet. SBAP further developed and completed the fact sheet and had the final version published for distribution to small businesses to assist them in complying with applicable stormwater regulations. For the chemical preparation industry project, SWT researched databases and compiled a list of chemical preparation facilities in TX. SWT surveyed these businesses on their basic environmental regulatory knowledge and needs and produced a final report. Survey results reflected business size and identified compliance issues. These results were presented to SBAP staff. SWT developed a draft chemical preparation facility fact sheet, which SBAP may enhance and finalize in the future.</p> |

**TABLE F-2**  
**(Continued)**

| <b>PROGRAM</b> | <b>ACCOMPLISHMENTS</b>   |
|----------------|--|
| Utah           | N/R  |
| Vermont        | No awards, recognitions...   |
| Virginia       | <p>SBAP has been relocated into a new division within DEQ - The Pollution Prevention and Compliance Assistance Division. One result of this move is the increased opportunity to provide <b>multimedia assistance</b> with the hopeful addition of resources.</p> <p>SBAP continues to be very proud of <b>EPA's Leadership Grant</b> to explore and provide compliance assistance and P2 information through the Internet and the development of our <b>web site</b>. Development is almost complete, and we are looking forward to training the small businesses and continuing to provide this resource. Please visit us at <a href="http://www.dep.state.va.us/osba/smallbiz.html">www.dep.state.va.us/osba/smallbiz.html</a>.</p> |
| Virgin Islands | We are <b>recommending to the DPNR Commissioner that our program should go multimedia.</b>   |
| Washington     | <b>Web pages</b> have been well received.  |
| West Virginia  | <p>New employee, who provides technical assistance, <b>completed CARB 100 series training class and successfully completed ISO 14000 Lead Auditor course and corresponding examination.</b></p> <p>The creation of a <b>Coal Handling/Preparation General Permit</b> has simplified and streamlined permitting for this industry sector.</p>   |
| Wisconsin      | N/R  |
| Wyoming        | A highlight of our outreach efforts this year was the production and broadcasting of a positive <b>P2 advertisement</b> highlighting our Department's goal to reduce pollution in our state. The package was contracted to a local firm, produced using photography from WY, and used an excellent western theme musical background. The advertisement was broadcast via radio and television across the state. The project was funded through a federal P2 grant and generated numerous positive comments.  |

**TABLE F-3**  
**TIPS AND BARRIERS RECOGNIZED BY THE PROGRAMS**

| PROGRAM              | TIPS/BARRIERS  |
|----------------------|--|
| Alabama              | N/R  |
| Alaska               | None to report at this time. The program is running smoothly.  |
| Arizona              | N/R  |
| Maricopa County      | <p>Tips</p> <ul style="list-style-type: none"> <li>• <b>Direct mailings signed by Director</b> (regulatory body) are more effective than letters from SBEAP.</li> <li>• <b>Specific time limits and deadlines</b> are better than saying "as soon as possible."</li> <li>• <b>Faxes</b> work better than calling if reminding sites to submit their permit application.</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>• Disputes within department related to <b>de minimus status determinations</b> and what SBEAP can do for sites related to that issue. Regulators would like sites to submit applications, then tell the sites they are exempt. This is costly and time consuming if they are clearly exempt. SBEAP staff does not tell sites they are exempt, rather, educates them on the rules and thresholds.</li> </ul> |
| Arkansas             | N/R  |
| California           | <p>Tips</p> <ul style="list-style-type: none"> <li>• Continually <b>update the organization's web site</b> so that information is readily accessible and current. In 1998, we achieved a 90% hit rate via search engines by thoughtful use of meta tags. This means that out of the 2.5 million hits on our web site in 1998 - a remarkable number - approximately 90% of the requests found some information related to their inquiry.</li> </ul>   |
| South Coast          | <p>Tips</p> <ul style="list-style-type: none"> <li>• The <b>automated business client tracking system</b> will be used as a prototype for other customer assistance programs. Other SBAPs have expressed interest in designing a system similar to ours for tracking work.</li> <li>• We have had a tremendous response from the local building and safety department from our outreach on permitting clearances. Because of their frequent staff turnover and lack of awareness of our air quality permit requirements, we need to constantly reinforce these relationships.</li> </ul>   |
| Colorado             | N/R  |
| Connecticut          | <p>Tips</p> <ul style="list-style-type: none"> <li>• We continue to succeed in delivering a <b>multimedia message to sector-specific small business categories</b>. We have contracted our outreach efforts on new regulatory requirements, but use these opportunities to provide small businesses with a refresher on other regulatory areas that affect them.</li> </ul>  |
| Delaware             | N/R  |
| District of Columbia | <p>Barriers</p> <ul style="list-style-type: none"> <li>• The program will be better run when there is a dedicated full time person who can develop and implement a plan for the program. For the program to achieve its goals, the three program components must be in place and operational, which is not the case for DC.</li> </ul>   |

**TABLE F-3  
(Continued)**

| PROGRAM  | TIPS/BARRIERS  |
|----------|--|
| Florida  | <p>Barriers</p> <ul style="list-style-type: none"> <li>• CAP appointments are legislatively mandated, but do not establish a service term. This creates a difficult situation when <b>CAP members do not participate yet want to “stay on” the CAP.</b> We are trying to resolve this issue at present.</li> </ul>   |
| Georgia  | <p>Tips</p> <ul style="list-style-type: none"> <li>• In 1998, SBAP adopted the <b>rules of Customer Service</b>, prepared by US EPA, after tweaking them to meet our needs. We assigned activities to a specific person and listed backups for each activity. We did this when we prepared our annual work plan. This allowed the program to run more effectively while the Agency was undergoing major changes.</li> </ul>  |
| Hawaii   | <p>Barriers</p> <ul style="list-style-type: none"> <li>• <b>Existing advisory groups speak against a formally appointed CAP.</b> Too few people have the time or inclination to serve on yet another advisory group.</li> <li>• <b>CAP requirement raises questions as to the legitimacy</b> of their specialized ad hoc advisory groups (e.g., Barbers Point/CIP Air Quality Advisory Task Force).</li> <li>• Unanswered questions as to the <b>authority of the CAP</b> where multimedia (non-air) issues are raised.</li> </ul>   |
| Idaho    | N/A  |
| Illinois | <p>Tips</p> <ul style="list-style-type: none"> <li>• Our <b>program is located in the economic development agency</b> for IL. We have found it essential to meet regularly with IEPA Bureau of Air to be effectively incorporated into the delivery system at the agency. Maximized communication has been the key to any successes.</li> <li>• <b>Outreach followed by an aggressive enforcement schedule</b> helps to maximize the calls for assistance. Businesses need an incentive to reprioritize their compliance responsibilities.</li> <li>• <b>Private partnerships</b> serve as the most effective marketing tool for SBAP program activities.</li> </ul> |
| Indiana  | <p>Tips</p> <ul style="list-style-type: none"> <li>• SBAP has been able to improve the environment and assist businesses more broadly than some SBAP programs due to our <b>multimedia</b> focus. Being able to expand beyond air issues allows small businesses to see the larger picture and stay in contact with all program areas.</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>• CAP provides only limited guidance and does not have a full panel.</li> </ul>   |

**TABLE F-3  
(Continued)**

| PROGRAM          | TIPS/BARRIERS  |
|------------------|--|
| Iowa             | <p>Tips</p> <ul style="list-style-type: none"> <li>• Effective assistance to small businesses needs to be more than “why, where, and what to do.” <b>Details of “how to”</b> should be an integral part.</li> <li>• Generic guidance materials, workshops/seminars are not very effective for “typical” small businesses. <b>Targeted and detailed specific information</b> is better received and is more useful.</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>• Provide an <b>incentive for legislators to appoint CAP members.</b></li> <li>• <b>Resources. Adequate staff training.</b></li> </ul>  |
| Kansas           | <p>Tips</p> <ul style="list-style-type: none"> <li>• We are trying to work with trade associations and local programs more effectively by <b>piggybacking on existing programs</b> or events. We provided a workshop in conjunction with the national screenprinters teleconference to provide additional state-specific information and answer questions.</li> </ul>  |
| Kentucky         | N/R  |
| Jefferson County | N/R  |
| Louisiana        | <p>Tips</p> <ul style="list-style-type: none"> <li>• Small <b>business owners prefer evening meetings</b> and seminars because it detracts less from their daily routines.</li> <li>• We use “<b>contacts</b>” and “<b>assists</b>” to <b>maintain a record</b> of our activities.</li> <li>• We mail <b>performance evaluation forms</b> to clients.</li> <li>• <b>Technical assistance sites</b> are found in major cities across the state.</li> <li>• We use <b>laptop computers to perform paperwork at site visits.</b></li> <li>• We use <b>spreadsheets to determine VOC content of paints.</b></li> <li>• A <b>database</b> helps us maintain complete records and prepare reports of our activities.</li> <li>• <b>Cooperation with the surveillance section</b> is key to assisting small businesses with NOV's.</li> <li>• Serve “<b>King Cake</b>” at all meetings during Mardi Gras season.</li> </ul> |
| Maine            | <p>Tips</p> <ul style="list-style-type: none"> <li>• Since our SBTAP only has two staff, it is very important to <b>use the skills and expertise of staff from other programs and organizations</b> to assist in delivering services.</li> </ul>   |
| Maryland         | N/R  |

**TABLE F-3  
(Continued)**

| PROGRAM       | TIPS/BARRIERS   |
|---------------|---|
| Massachusetts | <p>Tips</p> <ul style="list-style-type: none"> <li>OTA developed <b>software to assist companies in tracking VOCs and chemical use</b>. Office mailed notice of availability to industry with mail-back postcard to obtain free disk. Programs also available on the web site.</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>OTA <b>identified a regulatory barrier to zero discharge system</b>, promoted resolution through Common Sense Initiative. CSI council adopted resolution for EPA to address this problem.</li> </ul>   |
| Michigan      | <p>Tips</p> <ul style="list-style-type: none"> <li>SBO and SBAP should <b>work very closely with the air quality regulatory program</b> PRIOR to initiating any outreach. For example, the MI SBAP has worked closely with its air quality regulatory agency, along with business and industry, to address various air quality compliance issues prior to workshop implementation. This process was most especially useful when SBAP conducted its emission reporting workshops in November 1998 where a new electronic reporting system was being instituted. By holding a "peer review" training session prior to implementation of the actual statewide business and industry workshops, the SBAP was able to modify its presentation materials to reflect the comments and suggestions of business, industry, and regulatory personnel to make the workshop presentations as clear, concise, and smooth-flowing as possible.</li> </ul>   |
| Minnesota     | <p>Tips</p> <ul style="list-style-type: none"> <li>Maintain a <b>hotline</b> and always have it answered.</li> <li>Use a standardized <b>newsletter</b> to convey information and market the program.</li> <li>Market the program through the use of <b>trinkets</b>. Refrigerator magnets have been a big hit.</li> <li>Provide free <b>sector-specific spreadsheets</b> to businesses for recordkeeping or determining other compliance issues.</li> <li>Make <b>networking</b> with other service delivery providers a priority.</li> <li>Provide <b>on-site assistance</b>.</li> <li>Develop <b>sector-specific workbooks, videos, training, etc.</b></li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li><b>Funding</b> (always).</li> <li>A <b>lack of state or federal statutory authority</b> to move towards multimedia assistance.</li> <li>Rules that don't make sense.</li> <li><b>Opposing philosophies</b> on the benefits on non-regulatory assistance.</li> <li><b>Inconsistent enforcement</b> methods.</li> </ul> |
| Mississippi   | N/R   |
| Missouri      | <p>Tips</p> <ul style="list-style-type: none"> <li>Our on-site team is implementing a procedure of performing <b>follow-up by tracking each facility visited</b>. Follow-up will be done by either contacting the facilities, recording calls for additional help by the facilities, or reviewing written responses by the facilities in regard to the assessment report.</li> </ul>  |



**TABLE F-3  
(Continued)**

| PROGRAM       | TIPS/BARRIERS  |
|---------------|--|
| Montana       | <p>Tips</p> <ul style="list-style-type: none"> <li>• Ensure a <b>strict eligibility criteria when creating a loan program</b> to create fairness in reviewing proposals. However, don't make them so restrictive that businesses lose interest.</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>• <b>Location of SBO/SBAP within a regulatory/nonregulatory agency</b> creates problems with some, because they do not trust government.</li> </ul>  |
| Nebraska      | N/R  |
| Nevada        | None at this time.   |
| New Hampshire | <p>Tips</p> <ul style="list-style-type: none"> <li>• Developing <b>state- and sector-specific compliance/best management practices manuals</b> is an optimum way to foster compliance. The manuals must be as narrowly focused as possible for use by small business owners, as they do not have time to determine if something is applicable or not.</li> <li>• Actual small <b>business owners need to be consulted during the manual development stages</b> to determine if the information is appropriate and is written in a manner consistent with the "lingo" understood by the reader.</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>• A major problem we identified in providing outreach and assistance to small businesses is the <b>lack of accurate information</b> on who and where they are. We have minimized this problem by using computer-based data sources (such as ProCD's Phone Select Program) and developing a close working relationship with local code enforcement personnel.</li> </ul> |
| New Jersey    | <p>Tips</p> <ul style="list-style-type: none"> <li>• SBO/SBAP have worked with trade/business groups to <b>sponsor/cosponsor events</b> to ensure their members' participation and to provide greater outreach without cost to the SBO/SBAP.</li> </ul>  |
| New Mexico    | N/R  |
| New York      | N/R  |

**TABLE F-3  
(Continued)**

| PROGRAM        | TIPS/BARRIERS   |
|----------------|---|
| North Carolina | <p>Tips</p> <ul style="list-style-type: none"> <li>The Department established a <b>Permit Information Center</b>, which is attached to our office. The Center was originally staffed with senior permit writers who were on loan for a six month rotation period. While program divisions were not thrilled about giving up staff, they benefitted from the cross media training and received a picture of the larger regulatory puzzle. This was very valuable to the SBAP and SBO in developing user friendly guidance materials and providing an immediately available resource to provide multimedia technical assistance.</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>We have had significant problems getting <b>timely appointments of CAP members</b>. The specific requirements for minority and majority legislative appointments, the turnover in executive staff, and appointments to a purely advisory body have created problems. I believe a better solution may be to mandate an advisory body with broad-based membership, but not necessarily through the appointment process.</li> </ul> |
| North Dakota   | No suggestions.   |
| Ohio           | <p>Tips</p> <ul style="list-style-type: none"> <li>An SBAP should have a <b>working relationship with the state's inspectors and permit processors</b>, since they are the only "EPA" people a business is likely to deal with directly. Have the SBAP staff visit district inspectors and go on inspections with them. In OH, the SBAP site visits are made to resemble an actual inspection so the company can learn what to expect.</li> <li>Have the SBAP produce a useful tool (<b>source-specific permit exemption, emission calculation spreadsheet, etc.</b>) for <b>permit writers or inspectors</b> to use.</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>Getting the legislature to <b>appoint new CAP members to vacant positions is very slow and tiresome</b>.</li> <li>Constant reminders of how <b>negative an image of government is held by many small businesses</b>.</li> </ul>   |
| Oklahoma       | <p>Tips</p> <ul style="list-style-type: none"> <li>Our program has benefitted from being housed in the Customer Service Division within the Agency. This has allowed us, through the years, to develop <b>relationships and in-roads with key staff members and decision makers</b> within the regulatory division. This was a very unique approach to environmental regulatory agency organization, that is, to have a group that includes the SBAP that is dedicated to providing nonregulatory technical and regulatory assistance to business and industry in the state. This gives us <b>autonomy from the regulatory groups, but still allows us to network internally</b>.</li> </ul>  |

**TABLE F-3  
(Continued)**

| PROGRAM        | TIPS/BARRIERS  |
|----------------|--|
| Oregon         | <p>Tips</p> <ul style="list-style-type: none"> <li>We have found that <b>generic P2 classes offered through the SBDCs are not effective</b>. Since businesses are doing well right now, they do not appear to be interested in extra curricular training. The hazardous waste division has been very successful in getting people to attend their training classes. Without regulatory requirements for P2, people are not interested.</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>The <b>program needs to be multimedia</b> to be more effective. DEQ's current organization prevents this from happening. We currently are exploring the possibility of a multimedia technical assistance program. <b>Funding</b> seems to be one of the biggest barriers.</li> </ul>  |
| Pennsylvania   | N/R  |
| Puerto Rico    | N/R  |
| Rhode Island   | <p>Barriers</p> <ul style="list-style-type: none"> <li>One major barrier to our program is <b>RI's Operating Permits Commission</b>. This Commission, the only one of its kind in Region I, was put together by our Department's Office of Air Resources as a way to solicit funding for FTEs that are paid out of the Operating Permits Program. Since the SBAP is funded by Operating Permit Fees, the members of this Commission prefer that the SBAP perform only air assistance. Since the SBAP is an assistance program, it responds to the needs of small businesses on all media issues. Further, it is impractical for the SBAP to not respond to other environmental needs of small businesses. Certainly, the SBAP would be failing in its mission as an assistance program if it was impeded from performing the assistance duties mandated in CAA Section 507.</li> </ul> |
| South Carolina | N/R  |
| South Dakota   | N/R  |
| Tennessee      | <p>Tips</p> <ul style="list-style-type: none"> <li>We have structured and modified TN's program to meet our perceived needs to effectively use resources while not engaging small employers unnecessarily.</li> </ul>  |

**TABLE F-3  
(Continued)**

| PROGRAM        | TIPS/BARRIERS  |
|----------------|--|
| Texas          | <p>Tips</p> <ul style="list-style-type: none"> <li>Send regular <b>postcard regulatory updates</b> to industries identified as affected or in need of compliance assistance. Examples of regulatory updates SBAP mailed in 1998 include SBAP's newsletter, <i>The Advocate</i>, a quarterly publication containing regulatory updates of concern to small businesses; and metal finisher and foundry postcards.</li> <li><b>Send notice of proposed new regulations or rule amendments and regulatory guidance documents to affected business and trade associations for input/review.</b> Examples of notices/documents SBAP mailed in 1998 include proposed revisions to concrete batch plant standard exemption, changes to emission inventory reporting, proposed NESHAP for coating of plastic parts, risk reduction rule, stormwater fact sheet, special waste frequently-asked question sheet, TX Pollutant Discharge Elimination System (TPDES) frequently-asked question sheet, spray booth air flow calculation frequently-asked question sheet, draft EPA guidance document on potential to emit, Proposition 2 brochure, article on EPA's general permit for confined animal feeding operations (CAFO), TNRCC's Wastewater Permits Section TPDES web pages, EnviroMentor program summary, enforcement process summary, and SBAP web page changes.</li> </ul> |
| Utah           | N/R  |
| Vermont        | <p>Tips</p> <ul style="list-style-type: none"> <li>Develop and keep a <b>rapport with the regulatory program staff</b>. This has resulted in a lot of regulatory program referrals of small businesses needing assistance. Regular division updates are given (by SBCAP) to keep the regulators and general staff informed.</li> </ul>   |
| Virginia       | <p>Barriers</p> <ul style="list-style-type: none"> <li><b>Resource constraints</b> can hamper our ability to provide on-site compliance assessments -- what we see as a most essential element of providing credible compliance assistance.</li> </ul>   |
| Virgin Islands | N/R  |
| Washington     | <p>Tips</p> <ul style="list-style-type: none"> <li><b>OAPCA's Spray Coating Manual</b> is a valuable multimedia compliance information tool.</li> <li>All state agencies cooperated in a series of <b>fugitive dust control for construction sites seminars</b> given to industry.</li> </ul>  |
| West Virginia  | None in 1998.  |
| Wisconsin      | N/R  |

**TABLE F-3**  
**(Continued)**

| PROGRAM | TIPS/BARRIERS   |
|---------|---|
| Wyoming | <p>Tips</p> <ul style="list-style-type: none"> <li>• One of the keys to success with our CAP was <b>personal SBAP attention in identifying potential CAP members and encouraging the appointing officials to consider them for appointment.</b> By doing that advance ground work and then following up with the appointing officials, we were able to complete our CAP appointments/re-appointments and maintain a strong team that is making great strides in dealing with the issues before them. Sending one of our new members to the <b>CAP training in Scottsdale, AZ</b> early in the year was another key to this success.</li> <li>• The SBO is working to <b>improve coordination between the Office and the regulatory staff</b> in our Department. Considerable progress has been made. In 1999, we will improve our coordination and cooperation with all program personnel in the Department to optimize the services we provide to the businesses that operate in those sectors.</li> </ul> |

**TABLE F-4  
SUCCESS STORIES AND CASE STUDIES**

| PROGRAM         | SUCCESS STORIES AND CASE STUDIES   |
|-----------------|--|
| Alabama         | N/R  |
| Alaska          | <p>CAO was the subject of an independent study done by the University of AK. The study was designed to determine how small and medium sized firms viewed various state assistance programs and how to improve services to smaller businesses. One interesting factor that came out of the focus groups was that the companies that had dealt directly with the CAO/SBAP were happy with the service received. They stated that they would call again if they had a question and would recommend other companies to do the same.</p>  |
| Arizona         | N/R  |
| Maricopa County | <p>Using the Internet's Yellow Pages for direct mailings has been successful. The information includes zip codes, telephone and fax numbers, and is more up-to-date. We can also segment by city and within industries for a manageable workload. Brought many new sites into compliance.</p> <p>Newest idea: Only send the application pages that apply to the business. The current application is a "catch all" for all industries and is 10 double sided pages. When businesses receive the application, they are overwhelmed and confused. In most cases, most would receive 3 pages under the new plan. This would prompt them to complete the application more quickly as well as saving the Department postage and paper.</p> <p>Success story (edited letter dated 2/24/99 from Delores M. Bryson; Safety, Health, Environmental, Training, &amp; Waste Coordinator; Imperial Lithography &amp; Dryography; Phoenix, AZ to Richard Polito):<br/> <i>I am the Safety, Health, Environmental Training, &amp; Waste Coordinator at Imperial. April 24, 1996, EPA Region 9 came in and did a 7 hour audit. And after having been laid off only a few days before this, I returned to Imperial as a consultant, per Imperial's request. And with your help, I was able to meet all of the demands of EPA Region 9. You started me on the right path in 1996. I still have your letters and the notes I took when you were helping me regarding what, how, who, and all the other ideas you had. Therefore, I wanted to say Thank You!</i></p> <p><i>Beginning in 1996, Imperial has reduced waste disposal by 10.9 tons or 21,800 pounds and VOC emissions from 39 tons (78,000 pounds) down to 2.9 tons (5,761 pounds). Imperial did not have to pay a VOC emission fee for 1998.</i></p> <p><i>Judy Anthony, EPA VOC Emissions Audit Department, called me last Thursday, February 18, 1999, to give me "An Atta Girl," because my yearly report was perfect the first time and because the VOCs were extremely low. Judy wanted to know, "how did you do that?" First, all alcohol usage stopped April 16, 1998; second, the highest VOC-emitting ink is 2.69 pounds/gallon; and third, solvents are down from 6.79 to .20 pounds/gallon. I was enlightened; this is a record for a large commercial printing company equivalent to Imperial in the state of Arizona.</i></p> <p><i>Two years later after the first 1996 critical situation, with your help and focused in the correct direction, Imperial surpassed all governing agencies' expectations. I wanted you to understand, all your time and efforts have been and are helping many businesses and is very appreciated.</i></p> |
| Arkansas        | N/R  |

**TABLE F-4  
(Continued)**

| PROGRAM              | SUCCESS STORIES AND CASE STUDIES   |
|----------------------|--|
| California           | <p>For ARB's Ombudsman's Office, the case began with a call from the Executive Director of a business association in CA indicating a local District was about to close a rendering plant after issuing a number of Notices of Violation. The hot weather, among other adverse conditions, was resulting in the deaths of a number of large animals. The carcasses were piling up and creating an odor problem, because the rendering plant was not accepting carcasses.</p> <p>The following people became involved as the Ombudsman's Office facilitated discussion and resolution of a major growing health and air pollution problem: the local Air District, the CA Department of Food and Agriculture, residents around the rendering plant, the ARB Chairman, the Secretary of Cal/EPA, an assemblyman, the animal hauler, the CA Department of Health Services Director, the communicable diseases officer, local landfill operators, local health and environmental officers, and CA's Integrated Waste Management Board.</p> <p>The matter was resolved in two days by securing landfill permits and reaching agreement between the local District and the rendering plant for correcting the Notices of Violation. Thus, through good efforts, the ARB Ombudsman's Office helped various stakeholders to engage in constructive dialogue to resolve a multimedia problem in an expedited manner.</p> |
| South Coast          | <p>1. Individual courtesy phone calls to companies whose permits were about to expire, without the possibility of reinstatement, resulted in over 3,600 permits being reinstated and companies returning to compliance. The agency increased its revenue, and the companies avoided potential costs associated with applying for new permits or receiving penalties.</p> <p>2. SBAP staff attended the annual National Autobody Congress and Exhibition where they informed manufacturers about compliance problems and new regulations affecting manufacturing customers, thereby extending the resources of SBAP.</p>  |
| Colorado             | <p>SBO and SBAP teamed up on behalf of a small business sand and gravel mining operation. The company ran into problems with enforcement via a routine air inspection, which resulted in a NOV and subsequent fines. SBAP worked one-on-one with the owner to address the compliance deficiencies (i.e., completing the APEN/permit/control plan paperwork). The SBO represented the owner through the Compliance Order hearing and was able to negotiate the penalties to a minimum. The result of our team effort was the company quickly came into compliance and was able to continue to operate without any real hardships.</p>   |
| Connecticut          | N/R  |
| Delaware             | N/R  |
| District of Columbia | N/R  |
| Florida              | <p>1. Mailed over 2,000 calendars to dry cleaning/laundry service businesses.</p> <p>2. Developed and mailed a fact sheet for degreaser industry sector.</p>   |
| Georgia              | N/A  |

**TABLE F-4  
(Continued)**

| PROGRAM  | SUCCESS STORIES AND CASE STUDIES  |
|----------|---|
| Hawaii   | <p>Multi-agency and Media Issue Resolution - A farmer seeking to obtain and utilize an agricultural burning permit to dispose of various waste items that he "inherited" on land recently leased from the State of Hawaii sought assistance from the SBO. The SBO negotiated a waiver of lease rent with the state land agency on behalf of the farmer, which was equivalent to the cost of appropriate collection, transportation, and disposal of the non-agricultural waste (e.g., plastic nursery pots, treated lumber, tires, and wrecked autos) associated with the previous tenant. The SBO sought and received clarification from the air program with regards to the farmer's agricultural burning permit. The farmer was not required to segregate non-combustible items from his burn pile (e.g., unpainted concrete spoils and bricks) prior to burn. The farmer did not incur waste disposal costs for that which he was not responsible. The state land agency treated a new lessee fairly and ensured that waste was appropriately cleared from its land inventory, without incurring new costs. The air program demonstrated flexibility in its administration of the agricultural burning permit.</p> <p>Clarity and Compliance - A new dry cleaning establishment was unaware of appropriate protocols associated with the disposal of spent perchloroethylene (PERC). Within three working days, the SBO facilitated the issuance of an EPA ID number for the dry cleaner. The SBO also ensured that the dry cleaner received compliance information and submitted a covered source general permit application with the air program.</p> |
| Idaho    | N/A   |
| Illinois | Assisted a small fiberglass company (11 employees) to expand operations by facilitating its state air permit through the regulatory agency and assisting with completing the permit applications.   |
| Indiana  | IN's SBAP (CTAP) helps businesses each and every day to not only come into compliance, but to go above and beyond. Several industry sectors have received assistance through one of CTAP's integrated education programs. These programs include the development of a compliance manual that not only provides the rules/regulations for the environmental requirements, but also covers OSHA, DOT, and Department of Fire & Building Services' rules. In addition to compliance manuals, the integrated education program also includes workshops, on-site assistance, and a 5-Star environmental recognition program. The industries CTAP has successfully worked with include dry cleaners, vehicle maintenance, fiberglass, wood finishers, child care, and auto refinishers.   |



**TABLE F-4  
(Continued)**

| PROGRAM | SUCCESS STORIES AND CASE STUDIES   |
|---------|--|
| Iowa    | <p>Company D is an Iowa facility that produces toy models.</p> <p>In February 1996, Iowa Department of Natural Resources (IDNR) visited Company D, cited violations with permitting requirements, and Company D was asked to attain compliance within 60 days. Company D initially contacted a consultant and received estimates in the range of \$15,000-20,000 to complete the required permit applications.</p> <p>In June 1996, Company D requested assistance from the Iowa Waste Reduction Center (IWRC) in determining air permitting regulatory requirements. Company D was referred to the IWRC by the IDNR. Following a review of company operations and air emission sources, the IWRC determined that Company D needed "existing" air quality construction permits for five spray booths, two drying ovens, one paint stripping hood, four aluminum melting furnaces, and one burn-off oven.</p> <p>After completing the initial air emission review, the IWRC assisted Company D in completing construction permit applications for the existing sources. Company D saved at least \$15,000 on completing the 13 required permit applications. These applications subsequently were approved by the IDNR, and construction permits were issued for the 13 sources.</p> <p>IWRC and Company D identified a concern about the approved permits. Particulate matter (TSP) stack testing and opacity testing were required for each of the five spray booths and the single burn-off oven. TSP testing for six stacks would cost approximately \$12,000, while opacity testing for the sources was estimated at \$1,800. IWRC worked with Company D to respond to IDNR's requirements and propose an alternative stack testing regime. IWRC proposed to conduct one TSP stack test, eliminate opacity testing, and do additional stack testing only if the first test result showed allowable standards had been exceeded. The IDNR agreed with this regime with a visit and a written response. The TSP stack test was conducted on April 29, 1997. The data indicated the booth had passed the stack test.</p> <p>IWRC also assisted Company D in developing an emission inventory and documenting their "non-major" status. Currently, Company D is in compliance with state and federal air emission regulations. Company D saved \$27,000 by working with IWRC and IDNR.</p> |

**TABLE F-4  
(Continued)**

| PROGRAM          | SUCCESS STORIES AND CASE STUDIES  |
|------------------|---|
| Kansas           | <p>1. A small Kansas company needed to obtain their air permit, which was complicated, since part of their process resulted in HAP emissions. The Kansas SBAP assisted the company by calculating their potential and actual emissions and helping them complete their paperwork. The ombudsman "hurried along" the process after their application had been delayed within the regulatory agency (due to the resignation of an engineer).</p> <p>2. In another instance, we had a concern about the continuous release initiative from EPA Region VII. In this case, the technical assistance program helped companies see that if they found records of the xylene isomers used in their paint, they could prove that their actual emissions of p-xylene were below the thresholds. EPA still fined them \$2,200, but that was better than the \$11,000 originally levied.</p> <p>3. For Kansas dry cleaners, the technical assistance program staff is making site-specific compliance record organizers (notebooks). We will continue this service over the next year with additional workshops planned. Local vendors and local programs (in specific counties) will be assisting with workshop endeavors.</p> |
| Kentucky         | <p>1. The KY program published "Kentucky Small Businesses Volunteer Success Stories about the Kentucky Business Environmental Assistance Program" in February 1998. Copies were mailed to each SBO and SBAP in the country. The report was widely distributed in-state and was well received. The AQRSB has started working on a second pamphlet of new success stories.</p> <p>2. The biggest success story for 1998 was the effort the Division for Air Quality made to notify businesses possibly subjected to new regulations of the KBEAP. This effort, coupled with increased networking and partnering, resulted in a dramatic increase in assistance requests.</p> <p>3. Another highlight of the year was the cooperative effort between KBEAP, the Division for Air Quality, the Air Quality Representative, the KY State Chamber, various local chambers of commerce, and the Associated Industries of KY to provide Risk Management Plan seminars.</p>  |
| Jefferson County | N/R   |
| Louisiana        | <p>1. A cultured marble manufacturer, which is an employee-owned company of 18 people, contacted the LA SBAP as a result of receiving an EPA informational mailing concerning obtaining an air quality permit for styrene emissions. The SBAP engineer met with the company president to determine what needed to be done. "The cost savings to the company were considerable, because we didn't have to hire a consultant to do the work," said the president. He further stated that he feels more at ease knowing that the company avoided enforcement actions by obtaining an air permit to operate.</p> <p>2. The owner of a packaging company contacted an SBAP engineer about needing a permit for newer, larger, automated equipment. This business employs 15 people and has been growing and expanding through the years. The SBAP continues to work with this company in search of recyclable uses for its wood waste.</p>   |
| Maine            | N/R   |
| Maryland         | N/R   |

**TABLE F-4  
(Continued)**

| PROGRAM       | SUCCESS STORIES AND CASE STUDIES   |
|---------------|--|
| Massachusetts | <p>The Massachusetts auto body project generated simplified regulatory information by using the "good faith" rationale for penalty mitigation. Enforcement policies include setting penalties according to a number of factors, including whether a violator has shown good faith. But what is good faith?</p> <p>Working with a trade association, Massachusetts SBAP produced the manual, "Crash Course," which constitutes an agreement between the federal and state environmental enforcement agencies defining what an inspector will look for when he/she visits an auto body facility. (The manual also was mailed to all local boards of health.) In plain terms, information is offered to help an auto body shop owner/operator know what to do to comply with basic requirements. Included are a clear and simple version of the rules, pollution prevention tips, strategies to protect worker health, and documentation tools so that the shop can show an inspector how key activities are taking place. If an inspector finds violations, the shop can benefit from this demonstration of good faith if any penalties are assessed.</p> <p>This program has been well received by shops. Using the "good faith" policy allows regulatory simplification without any regulatory promulgation.</p> |
| Michigan      | N/A  |
| Minnesota     | <p>The loan program has been very successful, particularly within the dry cleaning industry. Many of these businesses have reduced their solvent use by as much as 90% by upgrading their equipment with a loan from the program. The loan program also helped a wood finisher make the move from solvent-based coatings to an aqueous-based line of wood products.</p>  |
| Mississippi   | N/R  |
| Missouri      | <p>An air conditioning manufacturing facility that had been visited by our on-site assessment team received a hazardous waste inspection by the department's regional office. Only a couple of minor violations were found. The facility was grateful for the on-site team's assessment, as it kept them from receiving other violations.</p>  |
| Montana       | <ol style="list-style-type: none"> <li>1. The SBO/SBAP settled a dispute between an auto body shop and several of its neighbors, who had complained about odors and dust from the shop's spray coating operations. The SBO/SBAP was able to convince the shop owner to install a ventilation/filtration/dispersion system to control air pollution from the spray booth. The SBO/SBAP provided technical assistance on system design as well.</li> <li>2. The SBO/SBAP created the Small Business and Tribal Energy and Environmental Loan Program to provide low-interest loans to small businesses and tribal entities to purchase energy efficient and P2 equipment. The loan program was able to keep over a dozen small, rural service stations from going out of business as a result of the underground storage tank regulations.</li> </ol>  |

**TABLE F-4  
(Continued)**

| PROGRAM       | SUCCESS STORIES AND CASE STUDIES  |
|---------------|---|
| Nebraska      | <p>A trailer manufacturing company switched to a new type of plasma cutter, which allowed them to cut aluminum more quickly and accurately. A problem arose, since the waste from the cutter was very fine, and when mixed with water, became unstable. The trailer company now had a disposal problem and nowhere to recycle the waste product (aluminum oxide). Faced with possible hazardous waste disposal expenses, the company environmental manager called the NE SBAP for assistance.</p> <p>The SBAP visited the trailer company to see the waste and determine the amount that was being created. The company was more than willing to cooperate! The SBAP determined that the company would generate over 55 gallons of aluminum oxide powder each day.</p> <p>Through a network of scrap dealers and other companies that cut aluminum, the SBAP found a company in Illinois that would take all the aluminum oxide that the trailer company could produce. The trailer manufacturer now is considering adding a second plasma cutter to increase production.</p> |
| Nevada        | <p>The Clark County Air Quality Program has had substantial compliance improvements by 1) requiring construction management to attend "dust school" for violations of fugitive dust, and 2) imposing increased fines for each subsequent violation for fugitive dust emissions. Signage requirements on construction sites note the phone number to call to report blowing dust, etc.</p>   |
| New Hampshire | N/R   |
| New Jersey    | <p>CAP developed its own mission statement. CAP invited 7 trade association representatives to some of its meetings so that these associations could present issues affecting their members. Based on this input, CAP developed a matrix to prioritize and identify cross-cutting issues. The CAP plans to bring this information to the attention of the Governor, Legislature, and NJDEP.</p>   |
| New Mexico    | N/R   |

**TABLE F-4  
(Continued)**

| PROGRAM  | SUCCESS STORIES AND CASE STUDIES   |
|----------|--|
| New York | <p><b>SBAP</b></p> <p>1. In 1998, SBAP prepared 52 Minor Facility Registrations and 14 State Facility Permits for small businesses, which brought each source into compliance with New York State's air emissions permitting regulations, Part 201. The SBAP also helped 71 businesses reply to a mass mailing in December by the state's regulatory agency, the Department of Environmental Conservation (DEC) that required permitted sources to indicate either their need for a Title V permit or their desire to cap their emissions under major thresholds. These were sources whose potential emissions exceeded major thresholds, but whose actual emissions may have been much less. By helping these businesses indicate an appropriate response to DEC, the SBAP brought them into compliance with the permitting regulation and prevented them from being classified as Significant Violators in the future.</p> <p>2. In addition, the SBAP responded to 166 calls from environmental consultants and attorneys, who typically were seeking regulatory and permitting information. If the results of each of those calls were to help even one business obtain the necessary permit or registration, then the SBAP helped bring at least 303 businesses into compliance with state permitting regulations, either directly or indirectly [based on adding the number of permits and registrations the SBAP completed (66), the number of businesses the SBAP helped respond to the DEC capping letter (71), and the number of businesses that might have received a permit or registration from a consultant who called the SBAP (166)].</p> <p>3. The SBAP developed a condensed version of the perc dry cleaning NESHAP initial notification form for third and fourth generation machines. The form was distributed at 11 workshops for dry cleaners statewide (attended by nearly 700 dry cleaners) and in response to hotline calls from dry cleaners. The SBAP's version took a 6-page form that addressed all generations of equipment and condensed it to a 2-page form for third and fourth generation equipment only (the most common types of machines after the state's phase-out of older equipment). Many cleaners couldn't recall if they had submitted the form, others had submitted it, but their facility was not on the DEC's list of facilities that had submitted forms, and still others needed to submit a new form for the new equipment they had purchased as a result of the state's regulation. Dry cleaners submitted these forms to DEC central office, their DEC regional office, and EPA's regional office in New York City. At this writing, more than 200 of these streamlined forms have been sent to the DEC regional office in New York City alone, bringing these facilities into compliance with that part of the NESHAP. More forms will be submitted as facilities make additional equipment changes.</p> <p><b>SBEO</b></p> <p>1. The SBEO negotiated a policy with the DEC in which the dry cleaners could voluntarily sign consent orders to come into compliance with the vapor barrier requirement of the new dry cleaning regulation - Part 232. The SBEO recognized that many dry cleaners throughout the state had missed a deadline to build a vapor barrier enclosure around their dry cleaning equipment due to reasons that were beyond their control (e.g., lack of available contractors, lack of available approved materials, confusion and misinformation about the requirement). The DEC agreed to let dry cleaners operating third generation machines that had missed the deadline, and who had a signed contract with a vapor barrier installer, to voluntarily comply by signing consent orders with a suspended penalty. The SBEO, in coordination with the DEC and trade associations, did extensive outreach on the policy. Over 300 dry cleaners took advantage of the consent order option.</p> <p>2. The SBEO coordinated an outreach effort with the DEC to increase the understanding and compliance of permitting requirements. The DEC conducted a mass mailing to inform permittee sources of their new permitting requirements. The SBEO mailing warned businesses not to ignore the DEC letter and offered free and confidential assistance. These mailings generated many hotline calls to both the SBEO and SBAP and resulted in many more permit assistance requests from small businesses to the SBAP (as described above).</p> |

**TABLE F-4  
(Continued)**

| PROGRAM        | SUCCESS STORIES AND CASE STUDIES   |
|----------------|--|
| North Carolina | A metal coating company called with questions about 112(r) and the changing requirements for propane. On a site visit, our engineer observed a number of problems with waste management and potential safety issues. The plant representatives indicated they were being trained, but management didn't really pay much attention to their needs. We talked with management and gave them some specific recommendations on how to address their problems, which were immediately implemented.  |
| North Dakota   | No strong, unique examples.  |
| Ohio           | <p>1. A small, one-person company that makes lead castings was inspected by District Office staff because of a complaint. The District Office maintained the company was a "secondary lead smelter," determined large potential emissions based on smelting emission factors, and deemed the company in violation for not having an air permit. The company was being prosecuted by the County Prosecutor for criminal violations of open burning and failure to obtain an air permit. Upon referral from the District, the SBAP visited the company and learned the operation was not secondary lead smelting, but was in fact exempt from permitting due to low emissions that were calculated using the appropriate non-smelting emission factors. The SBAP, on behalf of the company, successfully argued this point to the District Office and Prosecutor's Office, and the charge of failure to obtain a permit was dropped.</p> <p>2. Two years ago, SBO provided funding to the Printing Industry of Ohio for its ENVIROPRINT OHIO project. Printing Industry of Ohio produced an environmental operations manual for printers and conducted a series of workshops on its use. The industry responded favorably and the trade association reports a significant shift in attitude among its members about the state regulatory agency and about alternate technology. For this project, the Printing Industry of Ohio was awarded the OH Alliance for the Environment's "Business Environmental Educator of the Year" prize.</p> |
| Oklahoma       | <p>We continue to have great success with our site visits. We, as a program, prefer to meet with the individuals face-to-face, take a tour of their facilities, see their processes, and provide assistance from this vantage point. We believe this has allowed us to refine our methods of assistance and also better relate to the business owners.</p> <p>We also have continued to have outstanding success with our involvement in new rule proposal and revisions. We, as SBAP staff, are now asked to be on committees and workgroups within the Agency (particularly in the Air Quality Division) to help represent small business perspectives. In fact, we have become a source that is relied upon to provide a complete, holistic approach to regulating business in OK.</p>  |
| Oregon         | None.  |
| Pennsylvania   | N/R  |
| Puerto Rico    | N/R  |
| Rhode Island   | Our Lieutenant Governor has sponsored a monthly series of "Small Business Town Meetings" to help small businesses with a variety of issues including "Marketing Your Small Business" and "Working with State Government to Enhance Your Small Business." These meetings, held at various locales throughout the state, have been well attended and have generated lively, but fruitful discussions among the small business community. The SBAP always has sent a representative to these meetings and occasionally has been asked to make presentations regarding the program's nonregulatory services available to small businesses. SBAP's coordination of assistance activities with industry is a common occurrence at these meetings.  |

**TABLE F-4  
(Continued)**

| PROGRAM        | SUCCESS STORIES AND CASE STUDIES   |
|----------------|--|
| South Carolina | N/R  |
| South Dakota   | N/R  |
| Tennessee      | <ol style="list-style-type: none"> <li>1. TN was the first state in the region to develop and conduct 112(r) workshops for small businesses.</li> <li>2. A small wood operation that wanted to expand its business ran into compliance problems associated with the expansion and continued to have visible emission complaints. The TN SBAP helped to pair the wood operation with a major source that would accept wood waste. The wood operation was able to acquire funding to purchase equipment to properly size the wood waste so that it would be suitable for the major source's use. Compliance and emission complaints were resolved.</li> <li>3. A small business in a metropolitan area was referred to the agency for air permit violations. An inspection revealed compliance issues for several media. Our staff explained the consequences of the violations to the company and worked with them on possible solutions. The company now wants to be environmentally responsible.</li> <li>4. Use of electronic media assisted a company with a permit application violation to be in compliance in a matter of days.</li> </ol> |

**TABLE F-4  
(Continued)**

| PROGRAM | SUCCESS STORIES AND CASE STUDIES  |
|---------|---|
| Texas   | <p>1. The Site Visit Program is a key SBAP outreach effort that offers free technical assistance to small businesses through private consultants. The program focuses on opportunities for companies to reduce both the amount of pollution they create and the costs associated with proper waste handling. These site visits are free of charge, and all results are kept confidential. Begun in October 1997, site visits were requested by over 177 small businesses. Common problems discovered during site visits included failure to make a hazardous waste determination (49.72%), properly label waste containers (31.64%), keep monthly records of hazardous waste generation (28.25%), and register for air permit exemptions (20.32%):</p> <p>Surveys taken after the site visits found small businesses had made significant changes based on the consultants' recommendations. The program's overall result was a significant increase in compliance. Baseline compliance with air regulations averaged 78.4%, and waste regulations averaged 70.1% for all industries. Year-end compliance with air regulations increased by 11.6% to 90%, and compliance with waste regulations increased by 19.9% to 90%. Site visits also spurred more small businesses to recycle and use environmentally friendly solvents, which reduced waste and cut disposal costs.</p> <p>2. A grant from the Texas Natural Resource Conservation Commission (TNRCC) kicked off the state's first training course in the Spray Techniques Analysis and Research (STAR) program. Developed by the Iowa Waste Reduction Center, STAR teaches participants how to use spray painting equipment in an environmentally friendly manner. STAR students learn an efficient method that reduces the amount of spray paint going into the air instead of onto the vehicle, which also reduces VOC emissions that contribute to ground level ozone, a major air pollutant. STAR has some other bright outcomes: students learn how to reduce pollution, cut costs for the disposal of hazardous paint wastes, and gain a new skill that strengthens their employment opportunities. As a result of this program and several others, TNRCC won a second place award from the National Pollution Prevention Roundtable's 1998 Most Valuable Pollution Prevention Program.</p> <p>3. A new SBAP outreach effort, the foundry initiative, was created to inform foundry operators about environmental laws. In FY97 and FY98, SBAP staff conducted workshops and site visits, and developed a self-audit checklist for foundry operators. These efforts resulted in compliance increases for foundries: air compliance shot up from 52% to 93%, while waste compliance was up from 68% to 75%. Key to the initiative was promoting the reuse of foundry sand for the TX Department of Transportation (TXDOT) road and highway projects. Collaboration among TNRCC, EPA, TXDOT, foundry associations, and the TX Manufacturing Association Center made the initiative a success.</p> <p>4. Lancaster Furniture is proof positive that environmental investments can produce significant economic returns. This company slashed its paint and coating expenses 50 percent and cut regulatory reporting tasks to almost nil after implementing new technology that reduces air pollution while increasing painting efficiency. These changes were made based on SBAP recommendations during a site visit in 1998.</p> <p>At Lancaster Furniture, the focus was on volatile organic compounds (VOCs). These pollutants evaporate into the air from such substances as paint, thinners, and solvents. VOCs contribute to ground-level ozone, the major threat to air quality in southeast Texas. Following TNRCC recommendations, the company invested \$8,000 to purchase more efficient high-volume, low-pressure spray guns and related equipment and train employees in their proper use. VOC emissions dropped from just under 25 tons in 1996 to 16 tons in 1998, while annual expenditures on paints and coatings plummeted from \$69,000 to \$35,000.</p> |



**TABLE F-4  
(Continued)**

| PROGRAM        | SUCCESS STORIES AND CASE STUDIES   |
|----------------|--|
| Texas (cont.)  | <p>The VOC reductions help ensure a healthier environment for the 65 employees who work at Lancaster Furniture as well as for the community at large. The cost savings in materials mean the company has been able to avoid raising prices, a further boost for its competitive standing. The VOC reductions also put the company well under the 25 ton threshold that triggers permitting requirements, allowing company staff to concentrate on the business of making furniture.</p> <p>Lancaster credits the TNRCC program with raising overall awareness of environmental costs and issues in running a business. Lancaster realized that it could save disposal fees and make a healthier work environment by replacing certain products with less hazardous alternatives and recycling others. Now, for example, the company uses sponges instead of rags in initial stages of staining, allowing employees to recapture a considerable amount of stain that otherwise would have been tossed out on used rags. Stain recycling also has reduced the volume of rags hauled away for disposal at a cost of \$300 per barrel.</p> |
| Utah           | N/R  |
| Vermont        | Currently working documenting success stories.   |
| Virginia       | SBAP hosted a roundtable meeting with selected trade associations to inform them of the program's compliance assistance web site development activity. We asked for suggestions on how to improve the site and sought to understand the reach of the Internet within their organizations. The meeting was very successful, providing partnerships upon which we can build both electronically through the Internet, and in general, through joint outreach.  |
| Virgin Islands | N/R  |
| Washington     | N/R  |
| West Virginia  | SBO and SBAP were successful in the passage of state legislation for a "Small Business Environmental Loan Program." Loans can range from \$5,000 to \$150,000 with a 10 year payback at an APR of half the federal prime, but not less than 4.5%. The size of the small business cannot exceed 50 full time employees. Also, there is a provision to refinance loan balances where a small business has already obtained a commercial loan and completed a project.  |
| Wisconsin      | N/R  |

**TABLE F-4  
(Continued)**

| PROGRAM | SUCCESS STORIES AND CASE STUDIES   |
|---------|--|
| Wyoming | <p>1. Disposing of certain waste is a problem for many WY small businesses. During one-on-one site visits to small businesses that generate waste tires, we often hear concerns over this waste stream. Many landfills now are charging for accepting waste tires; the only tire shredder in the state charges for picking up tires and, at this time, is still putting shredded tires in a local landfill.</p> <p>Our office is looking for secondary uses for waste tires. Initial efforts have led to reuse of tires for retaining walls, livestock shelters, hay barn enclosures, and some minor farmstead construction projects. Follow-on activities include uses for shredded tire material depending on the economics of supply, transportation costs, and markets for the finished products.</p> <p>2. Many small businesses in Wyoming have problems disposing of waste wood from milling and wood manufacturing operations. The relatively small quantities of this waste stream that are generated at widely dispersed operating locations and the sparse rail transportation service in the state combine to limit the feasibility of reprocessing much of this material for reuse. The low population density throughout the state also limits marketing opportunities for reprocessed wood materials. As a result of these factors, much of this valuable waste stream is being burned or sent to landfills.</p> <p>The SBAP office has begun looking for secondary uses for waste wood. Initial efforts include helping to set up a municipal composting program at a sawmill to provide an alternative to burning wood waste. The local community will enjoy improved air quality, extended life of their landfill, and production of overburden material for closing off sections of the landfill as they are completed. Follow-on efforts include alternative uses ranging from pelletized fuel to composite construction material manufacturing.</p> |

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## **APPENDIX G**

### **COMPLIANCE ASSURANCE ISSUES**

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**TABLE G-1  
COMMON COMPLIANCE PROBLEMS**

SBTCPs were asked to note common compliance issues addressed in the course of providing technical assistance. Programs also were asked to indicate if certain problems were prevalent in any particular industry sector.

| Program              | Not understanding regulatory requirements | Operating w/out permit | Incomplete records  | Uncertain of permitting requirements/ need multiple permits | Uncertain how to determine emission inventories/ lack of tech expertise | Uncertain how to complete forms/ complicated paperwork | Lack of financing for equipment | Operating outside NSPS or MACT | Improper storage/ disposal of hazardous waste | Fear of regulatory agency/ arbitrary regulatory enforcement | Failure to use right equipment to comply w/standards | Other* |
|----------------------|---|------------------------|---------------------|---|---|--|---------------------------------|--------------------------------|---|---|--|--------|
| Alabama              | x   | x                      | x                   | x   |   |  |                                 |                                | x   | x   | x  |        |
| Alaska               | x   | x                      | x                   |   | x   | x  |                                 |                                | x   | x   |  |        |
| Arizona              | x   |                        | x                   | x   | x   | x  |                                 |                                | x   | x   |  |        |
| Maricopa Cty         | x   | x                      | x                   | x   | x   | x  |                                 | x                              |   | x   |  |        |
| Arkansas             | x   |                        |                     | x   |   |  | x                               |                                |   | x   |  |        |
| California           | x<br>(gas stations)                       | x<br>(paint booths)    | x<br>(paint booths) | x   | x<br>(auto body)  | x  | x<br>(small retail gas)         | x                              |   | x   | x  |        |
| South Coast          | x   | x                      | x                   | x   | x   | x  | x                               | x                              |   | x   |  |        |
| Colorado             | x   | x                      | x                   |   | x   |  | x                               |                                |   | x   |  |        |
| Connecticut          | x   | x                      | x                   | x   | x   | x  | x                               | x                              | x   | x   | x  |        |
| Delaware             | x   | x<br>(auto degreaser)  | x<br>(dry cleaners) | x   | x   | x  |                                 |                                |   | x   |  |        |
| District of Columbia | x<br>(dry cleaners)                       |                        | x<br>(dry cleaners) |   |   |  | x                               |                                |   |   |  |        |
| Florida              | x   | x<br>(dry cleaners)    |                     |   | x   | x  |                                 |                                |   | x   |  |        |
| Georgia              | x   | x                      | x<br>(dry cleaners) | x   | x   | x  |                                 | x                              |   |   | x<br>(gas stations)                                  |        |

N/R No response

**TABLE G-1  
(Continued)**

| Program       | Not understanding regulatory requirements | Operating w/out permit | Incomplete records     | Uncertain of permitting requirements/ need multiple permits | Uncertain how to determine emission inventories/ lack of tech expertise | Uncertain how to complete forms/ complicated paperwork | Lack of financing for equipment | Operating outside NSPS or MACT              | Improper storage/ disposal of hazardous waste | Fear of regulatory agency/ arbitrary regulatory enforcement | Failure to use right equipment to comply w/standards | Other*             |
|---------------|---|------------------------|------------------------|---|---|--|---------------------------------|---|---|---|--|--------------------|
| Hawaii        | x   | x                      | x                      | x   |   | x  |                                 |   | x   | x   |  |                    |
| Idaho         | x   |                        | x                      | x   | x   | x  |                                 |   |   | x   |  |                    |
| Illinois      | x   | x                      | x                      | x   | x   | x  | x                               | x   | x   | x   | x  | x                  |
| Indiana       | x<br>(dry cleaners)                       | x                      | x<br>(dry cleaners)    | x   |   | x<br>(vehicle maint.)                                  | X                               |   | x<br>(vehicle maint.)                         | X<br>(dry cleaners, vehicle maint)                          |  |                    |
| Iowa          | x   | x                      | x                      | x   | x   | x  |                                 | x<br>(dry cleaners, platers, furniture mfg) | x<br>(manuf)                                  | x   |  |                    |
| Kansas        | x<br>(sm/ med business)                   |                        | x<br>(sm/med business) |   |   | x<br>(sm/med business)                                 |                                 |   | x   | x<br>(sm business)  |  | x<br>(sm business) |
| Kentucky      | x   | x                      | x                      | x   | x   | x  |                                 | x   |   | x   |  |                    |
| Jefferson Cty |   | x                      | x                      |   | x   | x  |                                 | x   |   |   |  |                    |
| Louisiana     | x   | x                      | x                      | x   | x   | x  | x                               | x   | x   | x   | x  |                    |
| Maine         | x   | x                      | x                      | x   | x   | x  |                                 | x   | x   | x   |  |                    |
| Maryland      |   |                        |                        | x   | x   | x  |                                 |   |   | x   |  |                    |
| Massachusetts | x   | x                      | x                      | x   | x   | x  | x                               | x   | x   | x   | x  | x                  |
| Michigan      | x   | x                      | x                      | x   | x   | x  |                                 |   |   | x   | x  |                    |
| Minnesota     | x   | x                      | x                      | x   | x   | x  | x                               | x   | x   | x   | x<br>(degreasers)                                    |                    |
| Mississippi   | x   |                        | x                      | x   | x   |  | x                               |   |   | x   |  |                    |
| Missouri      | x   | x                      | x                      | x   | x   | x  |                                 | x   | x   | x   |  |                    |

**TABLE G-1  
(Continued)**

| Program        | Not understanding regulatory requirements | Operating w/out permit                            | Incomplete records  | Uncertain of permitting requirements/ need multiple permits | Uncertain how to determine emission inventories/ lack of tech expertise | Uncertain how to complete forms/ complicated paperwork | Lack of financing for equipment | Operating outside NSPS or MACT | Improper storage/ disposal of hazardous waste | Fear of regulatory agency/ arbitrary regulatory enforcement | Failure to use right equipment to comply w/standards | Other* |
|----------------|---|---|---------------------|---|---|--|---------------------------------|--------------------------------|---|---|--|--------|
| Montana        | x   | x   | x<br>(dry cleaners) | x   |   |  | x<br>(auto body, service)       |                                |   | x   |  |        |
| Nebraska       | x<br>(dehydrators)                        |   | x                   | x   | x   | x  |                                 |                                | x   |   |  |        |
| Nevada         |   | x   |                     |   | x   |  |                                 |                                |   |   | x  |        |
| New Hampshire  | x   | x<br>(toxics use)                                 | x                   | x   | x   | x  |                                 |                                | x   |   |  |        |
| New Jersey     | x   | x   | x                   | x   | x   | x  | x                               | x                              | x   | x   | x  |        |
| New Mexico     | x   | x   | x                   | x   | x   | x  |                                 |                                |   | x   |  |        |
| New York       | x   | x<br>(NY City sources w/city but no state permit) | x<br>(dry cleaners) | x   | x   | x  | x                               |                                |   | x   |  |        |
| North Carolina | x   | x   | x                   | x   | x   | x  |                                 |                                | x   | x   |  |        |
| North Dakota   | x   |   | x                   |   | x   | x  |                                 |                                |   |   |  |        |
| Ohio           | x   | x   |                     | x   | x   | x<br>(dry cleaners)                                    |                                 | x                              |   | x   |  |        |
| Oklahoma       | x   | x   | x                   | x   | x   |  |                                 | x                              |   | x   |  |        |
| Oregon         | x   | x   | x                   | x   | x   | x  | x                               |                                | x   | x   | x  |        |
| Pennsylvania   | x   | x   | x                   | x   | x   | x  | x                               | x                              |   | x   |  |        |
| Puerto Rico    | x<br>(auto maint shops)                   | x<br>(sm business)                                | x<br>(dry cleaners) | x   | x   | x  | x                               | x<br>(dry cleaners)            | x   | x   | x  |        |
| Rhode Island   | x   | x   | x                   | x   | x   | x  | x                               |                                | x   | x   | x  |        |
| South Carolina | x   | x   | x                   | x   |   |  |                                 |                                |   | x   |  |        |

N/R No response

**TABLE G-1  
(Continued)**

| Program        | Not understanding regulatory requirements  | Operating w/out permit                                | Incomplete records  | Uncertain of permitting requirements/ need multiple permits | Uncertain how to determine emission inventories/ lack of tech expertise | Uncertain how to complete forms/ complicated paperwork | Lack of financing for equipment   | Operating outside NSPS or MACT | Improper storage/ disposal of hazardous waste | Fear of regulatory agency/ arbitrary regulatory enforcement                   | Failure to use right equipment to comply w/standards | Other*                        |
|----------------|--|---|---|---|---|--|-----------------------------------|--------------------------------|---|---|--|-------------------------------|
| South Dakota   | x  |   | x   |   | x   |  |                                   |                                |   |   |  |                               |
| Tennessee      | x  | x   | x   | x   | x   | x  | x                                 |                                |   | x   | x  |                               |
| Texas          | x<br>(auto body/repair, dry cleaners, dairies, metal finishers, surface coaters) | x<br>(aqua culture, metal finishers, surface coaters) | x<br>(auto body/repair, dry cleaners, dairies, printers, foundries, metal finishers, surface coaters) | x<br>(aquaculture, dairies, metal finishers)                | x<br>(surface coaters)  | x<br>(dry cleaners, surface coaters)                   | x<br>(sandblast, surface coaters) | x<br>(dry cleaners)            | x<br>(metal finishers)                        | x<br>(printers, dry cleaners, auto service, metal finishers, surface coaters) | x<br>(surface coaters)                               | x<br>(dry cleaners, printers) |
| Utah           | x  | x   | x   |   | x   |  |                                   |                                |   | x   |  |                               |
| Vermont        | x  | x   | x   |   | x   | x  |                                   |                                | x   | x   |  | x                             |
| Virginia       | x  | x   | x   | x   | x   | x  | x                                 | x                              |   | x   |  |                               |
| Virgin Islands | x<br>(auto body repair)  | x   | x   |   | x<br>(dry cleaners)   | x  | x                                 | x                              | x   | x   | x  |                               |
| Washington     | x  | x   | x<br>(dry cleaners)   | x   | x   | x  |                                   |                                |   | x   |  |                               |
| West Virginia  | x  | x   | x   | x   | x   | x  |                                   | x                              |   | x   |  |                               |
| Wisconsin      | x  | x<br>(auto)   | x<br>(dry cleaners)   | x   | x   | x  | x                                 | x                              |   | x   |  |                               |
| Wyoming        | x  |   | x   | x   | x   | x  | x                                 | x                              | x   | x   | x  |                               |

**TABLE G-1  
(Continued)**

**\*Other**

|    |   |
|----|---|
| IL | UST's major problem with December deadline. Many are forced to close due to lack of financing to upgrade tanks. |
| KS | Wait for someone to come tell them what to do.  |
| MA | Lack of funds for implementing pollution prevention.  |
| TX | Hazardous waste determination, keeping monthly hazardous waste records.   |
| VT | Lack of a hazardous waste notification form filed with the Department.  |



**TABLE G-1  
(Continued)**

**PROGRAM RESPONSES**

Programs were asked for any specific regulations, monitoring, or recordkeeping requirements that were particular problems. Programs also were invited to provide general comments regarding common compliance issues addressed during the course of providing technical assistance. Individual program responses are listed below.

| <b>PROGRAM</b>       | <b>COMPLIANCE ISSUES</b>  |
|----------------------|---|
| Alabama              | Compliance with industrial storm water permits by auto salvage operations. These facilities have a very negative public image and are often controversial, because they need to locate in areas with no zoning laws. The industrial storm water permit is usually the only permit they need to operate.   |
| Alaska               | Rolling 12 month totals. AK's yearly certification of compliance with permit conditions.  |
| Arizona              | Most NESHAPs that apply to small businesses have overly complicated reporting, recordkeeping, and operational requirements (chrome and wood to name a couple). Simplified small business rules should be considered in many cases, or simple operational or process changes that can get them out of requirements altogether.                                     |
| Maricopa Cty         | As regulations are revised, sources aren't aware of changes that may affect them with the rule revision. Many sources still claim they never knew they needed a permit.   |
| Arkansas             | N/R   |
| California           | Since the local air districts issue permits, this (compliance) is largely inapplicable at our state level. Our workshops with those we regulate prior to rule adoption are well attended and have excellent participation. EPA recordkeeping requirements are onerous for small business rules written to meet EPA approval criteria are difficult to understand. |
| South Coast          | Daily recordkeeping concerns for very small users continues to be a problem. New Source Review. EPA's policy of treating relocation as a new facility.  |
| Colorado             | MACT regulations are resulting in financial hardships due to the cost to comply. Specifically, the dry cleaner MACT occasionally affects a business in this manner.<br><br>Common problem: The small business owner faces many different and complex regulations with multiple federal, state, and local agencies (i.e., EPA, OSHA, DOT, etc.).                   |
| Connecticut          | N/R   |
| Delaware             | Regulations are far too complicated and complex. They far exceed the capabilities of the regulated community to understand why the need to comply and how to comply as efficiently and economically as possible.  |
| District of Columbia | Dry cleaning facilities are required to record different activities at the shop, such as amount of PERC purchased and maintenance dates. This requirement mostly is ignored by the plant manager.   |
| Florida              | None at present.  |

**TABLE G-1  
(Continued)**

| PROGRAM       | COMPLIANCE ISSUES  |
|---------------|--|
| Georgia       | <p>The Enforcement Program inspected the PERC dry cleaners several times during 1998. Most of the dry cleaners inspected were noncompliant for recordkeeping.</p> <p>We feel the biggest problem is the lack of awareness of the programs that provide compliance assistance. We also feel that the Permitting and Enforcement Programs are remiss in not referring small businesses for assistance. If compliance assistance is a priority to Carol Browner, ECOS, and STAAPA-ALAPCO, 507 programs would have the resources available to improve compliance.</p>  |
| Hawaii        | N/R  |
| Idaho         | N/A  |
| Illinois      | <p>Although we are an air-focused program, we continually receive calls for assistance regarding USTs and contamination of private property. There seems to be a problem for companies wishing to upgrade or remove tanks in securing financing to get the work completed.</p> <p>There seems to be a lack of access to capital for most small companies. Those who need to make modifications often have difficulty in financing projects.</p>  |
| Indiana       | <p>Dry cleaners: weekly temperature readings, 12-month rolling total of PERC purchases.</p> <p>Wood furniture: NESHAP recordkeeping requirements.</p> <p>Fiberglass reinforced plastics: Lack of emission factors for open mold industry.</p>  |
| Iowa          | <p>Synthetic minor sources doing a Federally Enforceable State Operating Permit (FESOP) are required to keep a set of complex and confusing records to document compliance.</p> <p>Most small businesses want to do the right thing if they know what it is and are shown how to do it.</p>  |
| Kansas        | <p>There are problems with training and emergency preparedness under RCRA, recordkeeping under all NESHAPs, and compliance reporting that is triggered by the facility under the NESHAPs. Again, the businesses are more likely to fill something out and send it back, rather than remembering to generate a report of their own. Small businesses really need multimedia, site-specific compliance assistance. They really need someone to come in and tell them what to do. We don't think we can afford to do that for everyone, but that would be effective. A more realistic suggestion would be to simplify recordkeeping so that they can actually be in compliance. Another suggestion, although difficult to implement, is to integrate inspections so that when a company is visited by a regulator, that person could answer all the environmental questions. If a business is expected to understand all of the regulations, it seems reasonable to expect the same from the inspector.</p> |
| Kentucky      | N/R  |
| Jefferson Cty | N/R  |
| Louisiana     | N/A  |
| Maine         | Common compliance problems across all businesses include hazardous waste violations due to a lack of understanding of regulatory requirements.   |

N/R No response

**TABLE G-1  
(Continued)**

| PROGRAM       | COMPLIANCE ISSUES   |
|---------------|---|
| Maryland      | N/R   |
| Massachusetts | <p>MACTs. RACTs. Permitting exemptions. Potential to Emit.</p> <p>CAA requirements are not well understood. We see a lot of noncompliance in the field. There is a dearth of plain language explanation, and the rules are very complex. There is a lot of noncompliance with groundwater discharge requirements, particularly with unsewered areas and vehicle washing. Routine hazardous waste violations persist.</p>  |
| Michigan      | Hard and decorative chromium plating NESHAP. Asbestos NESHAP. Surface coating for metal parts (state rule), especially the recordkeeping requirements.  |
| Minnesota     | <p>Monthly rolling sums, emission inventory and fees, HAP tracking, RMP, some Form R.</p> <p>Lack of funding, difficulties getting multimedia assistance (too many rules, too many different sources of information), confusing or meaningless regulations.</p>   |
| Mississippi   | N/R   |
| Missouri      | N/R   |
| Montana       | N/R   |
| Nebraska      | RCRA paperwork. Continuous release reporting under CERCLA.  |
| Nevada        | None at this time.  |
| New Hampshire | <p>In general, maintaining adequate records for determining applicability of regulations (such as MACT or toxics rules) is a problem. Also, the inability to understand regulations as written continues to create frustration for those companies that want to be "in compliance" but can't determine what "in compliance" is!</p> <p>Most compliance problems can be resolved through the development and issuance of General Permits or plain language, industry-specific guidance documents (including self-certification workbooks).</p> |
| New Jersey    | The fact that a recordkeeping violation may receive the same weight of penalty as an actual air violation.  |
| New Mexico    | N/R   |

**TABLE G-1  
(Continued)**

| PROGRAM        | COMPLIANCE ISSUES  |
|----------------|--|
| New York       | <p>Dry cleaners in New York State are subject not only to the federal NESHAP, but to a significantly more burdensome state regulation. Compliance with the environmentally substantive, equipment-based elements of the NESHAP appears to be less difficult to achieve than compliance with the recordkeeping requirements of the NESHAP. However, the NESHAP's requirements, coupled with the complex state requirements for dry cleaners, make it difficult to achieve total compliance. Additionally, New York dry cleaners have to respond to phased state deadlines for equipment replacement and vapor barrier installation. For businesses that typically have fewer than 10 employees, only a couple of who may actually operate the dry cleaning machine, the combined federal and state regulatory requirements are difficult to understand and comply with.</p> |
| North Carolina | <p>Recordkeeping is a serious problem for small businesses. Permits routinely have monthly or annual reporting. Small businesses need to have this element of their permit emphasized. Standard reporting forms need to be developed, and regulatory agencies need to realize there are costs associated with recordkeeping. For small businesses, these costs are significant.</p> <p>Small business is still overwhelmed by the complexity of environmental regulations. They do not know if they need a permit or how to avoid a permit. For the most part, they are not able to keep up with changes that may affect them. Determining points of emissions, calculating emissions, and applying multiple sets of requirements to their business still makes it very difficult for the small business to comply with regulations.</p>                                   |
| North Dakota   | <p>Wood furniture manufacturing MACT presented some difficulties for affected businesses.</p>  |
| Ohio           | <p>Companies have had problems with state regulations (e.g., permit requirements), not federal regulations. Not having the required state permits is the most common violation found at small businesses. Despite 3 years of periodic mass mailings, many dry cleaners still have not filed for the required state permits. An inspection may be the only thing that will prompt most companies to file the appropriate paperwork.</p>   |
| Oklahoma       | <p>The largest problem appears to be operating without an air quality permit.</p>  |
| Oregon         | <p>The BAP currently is working with the hazardous waste division on outreach to dry cleaners. This effort should improve compliance with monitoring and recordkeeping requirements.</p> <p>DEQ is concerned about the possibility of the area source deferral ending. If this happens, many small businesses will have the potential to emit at major source thresholds. If that is the case, the BAP would no longer be able to help small businesses, because they would no longer qualify for the program as major sources. We have been in communication with Ginger Gotliffe/EPA about this issue.</p>   |
| Pennsylvania   | <p>Annual inventory report, plan approval and permit applications, EPA's MACT notification.</p>  |
| Puerto Rico    | <p>MACT requirements for dry cleaners (recordkeeping, control equipment). Lack of other agency requirements.</p>   |

**TABLE G-1  
(Continued)**

| PROGRAM        | COMPLIANCE ISSUES   |
|----------------|---|
| Rhode Island   | <p>RMPs could become another paperwork headache for small businesses. RMPs may be viewed by industry as duplicative, and they may sense that such plans piggyback on information already required of them by their local fire department under MSDS regulations. Whether or not this new requirement will become burdensome to small businesses remains to be seen.</p> <p>Another issue that could become a problem, particularly for the auto repair industry, is the requirement of EPA's Auto Emission Inspection Program. Presently, there are 900 inspection stations in RI. The program is to be combined with the safety inspection program. Because of the expense of emissions inspection equipment, only about 300 garages are expected to get this equipment, thus limiting the number of inspection stations. Anxiety about this program was expressed by repair facilities at a public hearing held last year. Repair facilities fear the loss of business and potential shutdown of garages that don't have the emissions inspection equipment. The new law is expected to take effect June 1999. Time will tell if this new law has a negative effect on these facilities.</p> <p>Instead of industry receiving separate visits by different media inspectors, a single visit by an inspector cross-trained to recognize air, water, and hazardous waste issues of a specific industry will do much to improve compliance by industry.</p>  |
| South Carolina | N/R   |
| South Dakota   | Recordkeeping requirements in certain MACT standards.   |
| Tennessee      | <p>Identifying companies affected by a particular regulation. A regulation could affect a process that includes several SICs.</p> <p>Small companies often don't have good environmental management practices in place.</p>   |
| Texas          | <p>Problems/assistance needs identified from hotline calls and site visits included: outreach to dairy, aquaculture, and die caster industries; hazardous waste determinations; waste container labeling requirements; waste recordkeeping; registration for air permit standard exemption.</p> <p>Common problems discovered during site visits included the failure to: make a hazardous waste determination (49.72%), properly label waste containers (31.64%), keep monthly records of hazardous waste generation (28.25%), register for air permit exemptions (20.32%).</p> <p>Comments received from hotline calls and site visits stressed the need to ensure small business input into the rulemaking process from the CAP, Small Business Advisory Committees, Review Committees, trade associations, and small business owners. Input is important to increase small businesses' knowledge and awareness of new regulations and amendments to existing regulations, as well as to ensure that regulations are in plain language and are not unduly burdensome for small businesses. These actions will help ensure that compliance problems for small businesses are reduced.</p> <p>The greatest compliance problem our office saw during this reporting period was determining which wastes are hazardous and documenting waste determinations. Site visit findings showed a 50% occurrence for this problem. Other problems identified and their frequencies of occurrences included: failure to properly label waste containers (32%), failure to keep records of monthly hazardous waste generation (28%), failure to obtain air authorization (32%), and failure to keep records to show compliance with air authorization (32%).</p> <p>To address the waste-related problems, we held a series of RCRA waste recordkeeping workshops and stressed recordkeeping in our printed guidance booklets.</p> |

**TABLE G-1  
(Continued)**

| PROGRAM        | COMPLIANCE ISSUES   |
|----------------|---|
| Utah           | N/R   |
| Vermont        | N/R   |
| Virginia       | MACT regulations continue to be highly confusing. Compliance through pollution prevention is a disincentive to small businesses because of the trap of "once in always in." Even if all pollution is eliminated, a business will still have to prove compliance.  |
| Virgin Islands | N/R   |
| Washington     | Monitoring and recordkeeping for dry cleaners, asbestos remediation, construction fugitive dust, outdoor burning.   |
| West Virginia  | No unusual problems.  |
| Wisconsin      | 112(r) RMPs.  |
| Wyoming        | <p>A number of small businesses have problems with keeping records of the materials used in their operations and in tracking accumulation and disposal of hazardous wastes and used oil.</p> <p>While considerable progress is being made to reach out to small businesses across the state, there are still remnants of the previous anxiety about dealing with our Department. The program will continue our outreach efforts through all the current channels. In time, we hope to break down those barriers to to optimize our effectiveness in providing compliance assistance and P2 initiatives for WY businesses.</p> |

**TABLE G-2**  
**RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA**

| <b>PROGRAM</b>       | <b>RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA</b>   |
|----------------------|---|
| Alabama              | Small businesses generally are dependent on consultants to help them complete permit applications and provide technical information needed to get them through the permit process. Because of the cost of this service, many small businesses may avoid getting permits until an inspector walks in the door and starts the regulatory process to force them to get a permit. If a more cost effective way of getting this service could be developed, there would likely be less non-compliance due to failure to obtain a permit. |
| Alaska               | None at this time.  |
| Arizona              | Provide funding for all SBAPs to expand/enhance their program to multimedia. Many businesses can actually do more harm to the environment if their assistance provider only looks at CAA requirements and not the potential impact that operational or process changes may have on water quality or land.   |
| Maricopa Cty         | More public service announcements.  |
| Arkansas             | N/R   |
| California           | Given the diversity in size and programs in CA and its air districts, small businesses highly value a flexible, non-prescriptive implementation approach to the CAA. Supplement the prescriptive approach (i.e., rule-making and evidence) with an equivalency approach that allows states the option of fashioning an equal method of securing the federally required air pollution reduction.   |
| South Coast          | EPA should provide resources identifying the common compliance problems nationwide that have technology-based solutions and then help develop and promote those technologies. This would advance P2.<br><br>Recognize that state and local jurisdictions often have developed regulatory programs suited to their local conditions and make equivalency much more easily achievable.  |
| Colorado             | Continued national effort with the President's initiative to write regulations in PLAIN English.  |
| Connecticut          | Requiring EPA regulatory writers to work together on related programs to eliminate redundant requirements and unnecessary reporting, and to look for opportunities for streamlining. One example would be Emergency Response/Community Right to Know and the Accidental Release Program under CAA.  |
| Delaware             | Make the regulations less complicated and easier with which to comply. Explain the benefits of compliance and be more straightforward and less bureaucratic in attempting to achieve higher levels of compliance in the small business sectors. Have a high degree of visibility within the small business community and work to develop relations built on trust and respect rather than fear and intimidation.  |
| District of Columbia | N/R   |

N/R No response

**TABLE G-2  
(Continued)**

| PROGRAM  | RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA   |
|----------|--|
| Florida  | Provide specific mandate for funding to conduct outreach/awareness campaigns to increase program visibility.   |
| Georgia  | GA thinks that all 507 programs need to be multimedia. We also think that Karen Brown's office should do a public service announcement about the 507 programs. The PSA should run in every state with the local SBO/SBAP number listed at the bottom of the screen. This would make businesses aware of the program and would ultimately increase compliance.  |
| Hawaii   | Develop a uniform minimum general permit (covered/non-covered) fee. Regulated small business emission levels sometimes do not correlate with posted minimum permit fees. Establishing uniform minimum permit fee levels might provide financial relief for industries such as dry cleaning.  |
| Idaho    | Be consistent. Provide support to state programs. Don't spend any more money on federal SBTCP. The money is needed in the states.  |
| Illinois | When regulations will have a definite impact on small businesses (UST deadline 98), the US EPA should work with SBA to set aside money in existing loan programs to be targeted to these sectors. In addition, US EPA should turn to SBA to identify environmental lenders in each state. Often a lack of knowledge of environmental issues by the lender prevents financing of projects. Environmental projects are a scary unknown that raise red flags of liability for lenders.  |
| Indiana  | <p>Simplify permitting applications and other paperwork for small entities so a consultant or engineer is not required. Allow common indicators (e.g., number of gallons of paint used, size of spray area, type of spray equipment) so Mom and Pops don't need to do calculations just to submit and find out they're exempt. Have the more complicated forms as a "turn around" from the agency once a simple letter/form is submitted that indicates a need for further details.</p> <p>Provide incentives (reduced recordkeeping, etc.) for suppliers of equipment or raw materials to provide all purchasers with permitting information. For instance, with each spray gun sold, a notice stating, "use of this equipment may indicate a need for an air construction or operating permit. The contact in your area is _____," with the state or local air management agency contact or SBAP contact listed.</p> <p>Provide more assistance to industries on hazardous waste regulations. Make guidance, nonrule policies, databases, permit applications, etc. more easily available and let the regulated facilities know this information is available.</p> <p>Consider repealing the requirement for area sources to get a permit in 2000.</p> |
| Iowa     | Clear and simple audit privilege or voluntary disclosure policies.   |
| Kansas   | N/R  |
| Kentucky | Adopt de minimus activity levels for all small businesses subject to NESHAPs by limiting potential emissions to area source limits and excluding them from Title V permitting.   |

N/R No response



**TABLE G-2  
(Continued)**

| PROGRAM          | RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA  |
|------------------|---|
| Jefferson<br>Cty | N/R   |
| Louisiana        | Conduct a national public relations program to let small businesses know that there is safe help available to them. Most small businesses want to comply with the law but fear the bureaucracies and will remain invisible until they are contacted. A national public relations program would let small businesses know that it's ok to contact the agency.  |
| Maine            | Consider raising the threshold for 112(r) from 10,000 pounds of propane for combined tanks to 10,000 pounds in a single tank. Numerous small businesses will be subject to this rule due to co-location of three 1,000 gallon tanks, which will bring them above the threshold. The regulatory burden of this threshold does not seem justified by the relatively small risk these facilities pose.   |
| Maryland         | N/R   |
| Massachusetts    | Under something like the Common Sense Initiative or NACEPT, define the sectors in terms of air pollution categories, such as small business VOC emitters. (Include employers with up to 500 employees.) With these groups, review what is required and what the goals of the current system are, and brainstorm simpler ways to get there. Use the multi-stakeholder approach to maintain a balance. Set the goal as reinventing rules, so that they make sense, are easy to understand, and provide not only better protection, but also better information. Build not only right-to-know into the system, but also provide extra benefits for those facilities that provide use information demonstrating that they use materials accounting, and even greater benefits for facilities that provide information showing either that they are doing prevention plans or are achieving prevention. For these performing facilities and for facilities that agree to provide direct access to their monitoring, provide reduced inspection priorities, reduced fees, simplified authorization, and other benefits. Conduct pilots of these alternative regulatory approaches with measurements of environmental outcomes, including costs to facilities and agencies.  |
| Michigan         | <p>EPA should work more closely with the SBAPs on national compliance incentives. EPA should include the SBAP early in the process of establishing goals and criteria for compliance and enforcement and should actively solicit the feedback of the SBAPs on all compliance initiatives.</p> <p>Provide grants or low interest loans (under the administration of the SBTCPs only) for small and medium-sized businesses for modification of current facility processes and control equipment to reduce air emissions.</p> <p>Provide more grant monies to state SBTCPs to develop and use innovative ways to distribute environmental program content and services to various industry sectors -- a type of "back door" approach to outreach and education for the small business workforce. For example, a federal or state grant might allow a SBTCP to work with federal and state government, as well as business, industry, and statewide educational institutions to coordinate and package environmental compliance and P2 information that is specific to industry sectors. The information might be introduced to students at the secondary or post-secondary level so that by the time the student enters the workforce, he/she will bring timely, relevant and useful knowledge and experience to specific industry or businesses.</p> |
| Minnesota        | Develop or support federal legislation that would mandate all SBOs/SBAPs to be multimedia in format!!!! Offer amnesty programs.   |

N/R No response

**TABLE G-2  
(Continued)**

| PROGRAM       | RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA   |
|---------------|--|
| Mississippi   | Be proactive in providing information in the applicability and implications of the regulations.  |
| Missouri      | N/R  |
| Montana       | Coordinate the efforts of EPA SBO/SBAP with OECA to prevent OECA from conducting compliance assurance activities without first notifying the EPA SBO or the state SBOs. This has disturbed the trusting relationships SBO/SBAPs have built with businesses in several states.  |
| Nebraska      | N/R  |
| Nevada        | No recommendations at this time.   |
| New Hampshire | <p>Encourage/require that the SBTCP be multimedia and ensure funding is available for effective operation. In addition, clear guidance, tools, and funding need to be provided to allow the programs to measure effectiveness without interfering with the provision of useful assistance.</p> <p>The SBTCP should, by federal mandate, be the lead programs for providing environmentally related assistance.</p>   |
| New Jersey    | EPA must increase its marketing and publicity campaign for both the federal SBO/SBAP and state SBOs/SBAPs. Specifically, the regulated community needs to be informed of the compliance assistance services available through the state and federal SBOs/SBAPs. In addition, funding levels for more staff at the state level would greatly increase program effectiveness and outreach.   |
| New Mexico    | N/R  |
| New York      | <p>Congress has taken a step in the right direction to help small businesses by requiring Section 507 programs in each state. In conjunction with EPA enforcement initiatives, Congress also should encourage, perhaps via incentives, a coordinated strategy between the regulatory enforcers and implementation/compliance assistance units so that small businesses are given fair notice and opportunity to comply: notification followed by compliance assistance/education followed by enforcement. Presently, there is much tension between the compliance assistance and enforcement groups, since each is perceived to represent mutually exclusive compliance strategies. However, most people in compliance assistance acknowledge that enforcement is necessary after sufficient notification and assistance. These groups need to be working closer toward the common goal of environmental health via environmental compliance.</p> <p>In developing regulations that affect small business sectors, regulators need to take the needs of small businesses into account in developing ways to achieve regulatory goals. For example, the dry cleaners, like most small businesses, have a difficult time with recordkeeping. Maybe there is another way to determine compliance with the avoidance of leaks...maybe tracking PERC usage? Currently, developing regulations is done in reverse: the regs are written and then small business impact is analyzed. In the case of EPA regulations, the small business impacts are taken into account based on the limited input available from small businesses and the regulations are revised between proposal and final ruling. However, at the state level, the regulatory impact analysis for small businesses is cursory and frequently underestimated.</p> <p>SBREFA is the federal regulation that looks out for small business. Perhaps the states should be required to adopt SBREFA.</p> |

**TABLE G-2  
(Continued)**

| PROGRAM            | RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA   |
|--------------------|--|
| New York<br>(cont) | <p>Streamline recordkeeping for small businesses and eliminate burdensome recordkeeping. Duplicative or trivial recordkeeping and reporting do not serve any purpose. They do not encourage or improve compliance. Some examples: Why should a halogenated solvent cleaning NESHAP source submit a report on exceedances twice a year whether or not they had any exceedances? How does a recordkeeping log from a dry cleaner indicating that they checked their equipment for leaks prove that they actually looked for leaks? Such excessive paperwork only creates extra work for the small business and takes away precious time that they could otherwise use to perform pollution prevention measures.</p> <p>The SBEO/SBAP should take an active role in commenting on proposed federal regulations/control strategies that impact small businesses. Although EPA's goal to have small businesses participate in the rule making process (SBREFA) is laudable, very few small businesses have either the time or expertise to comment on proposed rules or control strategies. The SBEOs and SBAPs have the technical, legal, and economic backgrounds to comment in a manner that could reduce the impact of a regulation on small businesses, while still implementing control strategies that protect the environment.</p> <p>The federal legislation that creates SBTCPs should also mandate minimum program staffing and funding, based on the number of affected sources in each state. This would prevent state legislatures from gutting the funding for a program as a result of political or other pressures, or failing to establish meaningful programs in the first place. Compliance assistance to regulated small businesses shouldn't be subject to political whims or pressure from lobbyists for large businesses who feel their Title V fees shouldn't go toward helping other sources comply. There currently is pressure by larger businesses and their representatives to reduce or prevent the use of Title V fees for helping small, non-Title V -affected sources. Congress should examine providing funds for 507 programs from monies other than Title V fees.</p> <p>The New York State Department of Environmental Conservation should institute the draft Voluntary Compliance policy as soon as possible.</p> |
| North Carolina     | <p>Modify EPA policy of "once in, always in." This will allow major MACT sources to voluntarily reduce emissions below major thresholds to become small "nonmajor" sources and receive benefits of less emissions, less recordkeeping, less reporting.</p> <p>Support and expand initiatives for multimedia environmental assistance. Small business does not understand why 4-5 agencies have different requirements and inspectors for one chemical or process. We must make it easier for business to understand the requirements. Once they understand what they need to do, why, and how, compliance will improve.</p> <p>EPA and state regulatory agencies need to be more receptive to allowing small business to do training, community environmental involvement, and other educational efforts in lieu of fines for notice of violation. Certainly, first time offenders should be offered assistance in resolving their problem or making sure it does not happen again, rather than fines.</p>   |
| North Dakota       | Write regulations in language more understandable to small business.   |

**TABLE G-2  
(Continued)**

| PROGRAM      | RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA  |
|--------------|---|
| Ohio         | <p>US EPA should finally decide that dry cleaners, chrome platers, or degreasers do not EVER need Title V permits. In most states, the number of dry cleaners alone greatly exceeds the number of presently identified Title V facilities. Decide now - don't defer the issue for another five years.</p> <p>Both state and federal regulatory agencies must continue to attempt to translate environmental requirements into language and forms that can be understood by the small business person. This means simple language, clear charts and tables, and examples that have been tested in the field with real business people.</p>   |
| Oklahoma     | Better cooperation between the Regions and the states.  |
| Oregon       | <p>The greatest obstacles to assisting small businesses in complying with the CAA are the lack of financial and staffing resources. Many SBAPs are functioning at a 1.0 FTE level. More educational training, financial, and support assistance are needed. Also, achieving compliance through educational programs emphasizing pollution prevention should be given a higher priority at both the federal and state levels.</p> <p>Financial</p> <ul style="list-style-type: none"> <li>• Allocate \$5 million to SBAPs.</li> <li>• Develop a national policy that allows small businesses to invest in P2 technologies.</li> <li>• Institute a revolving fund to finance small businesses willing to invest in MACT and BACT.</li> <li>• Fund small business R&amp;D projects with emphasis on P2.</li> </ul> <p>Regulatory</p> <ul style="list-style-type: none"> <li>• Adopt realistic potential to emit criteria for small businesses.</li> <li>• Adopt simple, less costly emission testing procedures for very small area NESHAP businesses.</li> </ul> <p>SBAP Support Projects</p> <ul style="list-style-type: none"> <li>• Develop an easy-to-use national technical assistance tracking and reporting database.</li> <li>• Develop a national small business mentorship program.</li> <li>• Develop a national cross-media P2 green sticker recognition program.</li> <li>• Develop a national simplified ISO 14000 plan for small businesses.</li> </ul> <p>Education</p> <ul style="list-style-type: none"> <li>• Develop a national educational program at state small business development centers.</li> <li>• Use OR SBAP-SBDC P2 cross-media training as model for national program.</li> <li>• Employ state SBDCs to disseminate specialized training.</li> </ul> <p>Training</p> <ul style="list-style-type: none"> <li>• Offer 1-2 hour teleconferences for all area source NESHAP regulations.</li> <li>• Develop 30-minute training videos with workbooks for small business sectors.</li> <li>• Offer teleconferences on cross-media P2 and environmental auditing.</li> <li>• Offer a national training teleconference for environmental consultants serving small businesses.</li> </ul> |
| Pennsylvania | N/R   |

**TABLE G-2  
(Continued)**

| PROGRAM        | RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA   |
|----------------|--|
| Puerto Rico    | N/R  |
| Rhode Island   | As EPA makes industry-specific regulatory changes, it would be helpful for federal or state officials to hold workshops (or informational sessions) for industries so that they can be made aware of what's required of them to comply with the new changes. The workshops would be held once a regulation is set to become law and in a manner that would allow the affected industry a reasonable timetable to comply. It also would be helpful to have industry associations participate in this process by being available to assist their members in making any transitions necessary to comply with the new or amended regulation.   |
| South Carolina | N/R  |
| South Dakota   | EPA should increase their efforts in helping states identify sources or categories of sources that will be affected by a MACT standard.<br><br>EPA should discontinue the policy of "once in, always in." It does nothing but hamper efforts to get facilities to reduce toxic emissions.  |
| Tennessee      | Too many organizations and layers of government offering help to the employers. Congress should recognize and fund state Section 507 (CAA) groups to interact with small business administration efforts to serve employer needs.  |
| Texas          | At the federal level, include small business review and input in rulemaking process. Streamline permitting process. Include a "de minimus" concept for all media. Expand available exemptions. Write exemptions for small businesses into all rules; use a stairstep approach where controls increase as business size and production increase. Write rules in plain language. Make compliance conditions, such as recordkeeping and reporting, easier by using common business terms (e.g., gallons used vs pounds/hour, or gallons generated for hazardous waste). Make all SBAP assistance at the state and federal level multimedia and reinforce it with funds for the program. Increase availability of low-cost loans.  |
| Utah           | Environmental assessment training opportunities -- Industry-specific training sessions that provide a step-by-step approach to conducting on-site environmental assessments (including P2 assessments) would be of great benefit to SBAP staff.  |
| Vermont        | N/R  |
| Virginia       | At the federal level, we would recommend that the Small Business Enforcement and Self-audit Policies be reviewed and changed to provide consistency of application and interpretation by all EPA Regional Offices. The small businesses do not now see these policies as affording any degree of safety that might encourage them to utilize them as they make repairs to any compliance deficiencies they may have. Many businesses will not come forward and identify themselves if there are potential penalties involved. Because the application of the policies is on a case decision basis, differences in application may be inconsistent from region to region or even within a region, again providing uncertainty about the use of the policies. Once the policies are uniformly accepted, understood, and implemented by the regional offices, the EPA should embark on a heavy marketing campaign to promote them as non-enforcement incentives. Marketing was lacking the first time around.<br><br>Resolution of compliance problems caused by new regulations or existing requirements must provide adequate time for small businesses to incorporate potential resource expenditures, both financial and human, that the company may require. |

N/R No response

**TABLE G-2**  
**(Continued)**

| <b>PROGRAM</b>   | <b>RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA</b>  |
|------------------|--|
| Virginia (cont.) | <p>More comprehensive economic impact analysis of regulations affecting small businesses. Is the gain in emission reduction worth the price that will have to be paid?</p> <p>Provide adequate funding by EPA to promote and provide for program expansion into multimedia (water, waste, and small community assistance).</p> <p>Have the Small Business Administration create a revolving loan fund to assist small businesses to finance their compliance activities.</p> |
| Virgin Islands   | One standard form for on-site visits and recordkeeping. Continued training for SBO/SBAP.   |
| Washington       | Clearer language in regulations.   |
| West Virginia    | <p>Enact federal legislation that requires the states to promulgate an effective "self audit" program for small businesses.</p> <p>The state of WV and the federal government, if necessary, would enact legislation that authorizes the SBO to function as a multimedia ombudsman.</p> <p>Federal legislation should be enacted that allows SBREFA to apply to federal programs that have been delegated to the states.</p>   |
| Wisconsin        | Find a new way to measure success. Regulatory agencies should look for positive measures of pollution reduction/elimination instead of dollars collected in fines or number of enforcement actions.  |
| Wyoming          | Provide targeted grant funding to help small businesses that want to implement P2 or other compliance-related programs, but can't afford the up-front costs.   |

**TABLE G-3  
CONFLICT OF INTEREST/CONFIDENTIALITY ISSUES**

The SBTCPs provided information as to how their programs address internal or external conflicts of interest (COI) or perception that their programs may not be confidential.

| <b>STATE OR TERRITORY</b> | <b>COI ISSUES AND RESOLUTIONS</b>  |
|---------------------------|--|
| Alabama                   | N/R  |
| Alaska                    | SBAP is located in the Compliance Assistance Office (CAO) of the Division of Statewide Public Service (SPS). The CAO is located in a non-regulatory and non-enforcement office within the Department. Under AK law, CAO staff providing on-site assistance do not have enforcement authority. In addition, the Division has developed reporting relationships with EPA and other divisions that do not require facility names to be identified. CAO only shares the nature of compliance concerns identified.  |
| Arizona                   | Existing policies, strong support from the Director of the ADEQ, and good working relationships with the programs have done a great deal to maintain our credibility as a source of assistance that can be used without risk of exposure.<br><br>Our program does not advertise confidentiality. In fact, before we conduct a site visit, we inform the business that our report is not confidential. The simple fact is that our enforcement personnel and NGOs have better things to do than comb our files for people who are already taking steps to come into compliance voluntarily. |
| Maricopa Cty              | Confidentiality has not been a problem to date. We take the position of educating the site on their regulatory obligations and the possibility of enforcement action if they fail to comply with applicable regulations. We, however, do not "turn them over" if they don't follow through by submitting their application or paperwork.   |
| Arkansas                  | Confidentiality has never been considered a problem. Where small business can avoid a relationship with the regulatory agency, a relationship will be avoided.   |
| California                | The Ombudsman's Office is part of the Air Resources Board Chairman's Office, and no COI or confidentiality issues have arisen yet.   |
| South Coast               | Businesses constantly ask for reassurance. We now have a reputation for maintaining confidentiality and by word-of-mouth and trade association referrals, customers are open to our services. Our Local Government and Small Business Committee is reviewing this issue in 1999.   |
| Colorado                  | To date and since the SBO program's beginning (12/1/97), the SBO has had no COI regarding confidentiality. The same goes for our SBAP.   |
| Connecticut               | Connecticut does not offer confidentiality.  |
| Delaware                  | Not a problem.   |
| District of Columbia      | The SBAP is a permit engineer as well as an inspector who can recommend or carry out an enforcement action. In this situation, the conflict of interest is unavoidable.  |

**TABLE G-3  
(Continued)**

| STATE OR TERRITORY | COI ISSUES AND RESOLUTIONS  |
|--------------------|---|
| Florida            | We do not require that an inquirer identify him/herself. We do not disclose compliance issues to the enforcement section.   |
| Georgia            | The SBAP avoids the discussion of confidential material with enforcement personnel unless enforcement makes a referral. When discussions are unavoidable, the business names are not used; or, circumstances are presented and assurances are secured before any sensitive materials are discussed.   |
| Hawaii             | Separate SBO/SBAP mailing lists and intake files. Confidentiality offered to all SBO callers/contacts and maintained where requested. Secured and locked SBO files.   |
| 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.</p> <p>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>   |
| Illinois           | <p>We are located separately from the regulatory agency. We do not share client information with the IEPA unless the client is comfortable with this and we are facilitating their discussion.</p> <p>If a Freedom of Information Act request was made, we would only have to give numbers and not names of companies assisted.</p>   |
| Indiana            | <p>IN's Compliance and Technical Assistance Program (IN's SBAP), which is part of IDEM (the regulatory agency), operates under strict confidentiality as mandated by state statute (IC 13-28-3-4). The statute prohibits program staff from revealing confidential information to personnel in the agency or to the public unless the client specifically waives confidentiality, or if there is a clear and immediate danger to public health or the environment.</p> <p>A non-rule policy document (published in the December 1996 Indiana Register) and written confidentiality procedures add explanations and details on how we implement the statute. The written procedures are changed, as needed, to reflect new information or new situations that have arisen. During 1998, the procedures were updated twice.</p> <p>The physical location of CTAP is in a separate building than the rest of IDEM, and access to the office is limited. Only the main reception area, conference room, and mail room are public areas in which anyone is allowed. Other areas are either escort-required (private offices, kitchen, main aisle) or access prohibited (individual cubes, side aisles, and staff meeting areas). Accessibility is indicated by posted signs and colored tape on the floor and doorways.</p> <p>Working effectively within IDEM's regulatory offices is sometimes difficult, because our strict confidentiality policy can hinder communication or coordination of efforts.</p> |
| Iowa               | The IAEAP is funded by the IA Air Quality Bureau (AQB) of the IA DNR. Contract terms stipulate disclosure of the IAEAP client information to the AQB if such information is requested. Unless specifically requested (very rarely), no client information is volunteered to the regulatory agency. The IAEAP clients are informed that "confidentiality" does not exist with the SBAP.  |



**TABLE G-3  
(Continued)**

| STATE OR TERRITORY | COI ISSUES AND RESOLUTIONS  |
|--------------------|---|
| Kansas             | Confidentiality has not been an issue with the KS program. KDHE's contract with the universities indicates that business names will be confidential. Reports indicate businesses by SIC code, county, and type of question (in general) only. The ombudsman maintains confidentiality by agreement of the regulatory bureau directors who understand the importance of confidentiality. In some instances, it is difficult to resolve a conflict when the name of the business is to remain confidential. In these cases, we discuss options with businesses and explain these difficulties. Most of the time, businesses are interested in resolving their problems and will waive confidentiality to expedite resolution.   |
| Kentucky           | Compliance issues where confidentiality is impossible (e.g., permit application submission) are resolved by the Division for Air Quality recognizing the TAP's assistance is a good faith effort to comply, thereby waiving or reducing civil penalties. This is explained to the business during the application completion process. Other issues (e.g., compliance issues with standards or control requirements) are handled confidentially through compliance agreements between the small business and the TAP.  |
| Jefferson Cty      | An amnesty program is in place to encourage honest and prompt self-reporting.   |
| Louisiana          | We have had no problems regarding confidentiality with state enforcement. Regional EPA inspectors come into the state, unannounced, and levy heavy fines on small businesses we have been working with, which results in the perception that our program is not confidential.   |
| Maine              | SBTAP has adopted the Small Business Compliance Incentives Policy based on EPA guidance.  |
| Maryland           | N/A   |
| Massachusetts      | OTA is outside of the regulatory agency and has a statutory mandate for confidentiality.  |
| Michigan           | <p><i>External conflicts of interest</i><br/>Confidentiality has not been an issue with the current services provided by the SBTCP. The SBAP is developing guidance publications, presenting 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 is in the process of developing a policy that explains how the program will respond when it becomes aware of a violation by a facility seeking assistance. The policy also will explain that information contained in the SBTCP files or databases will not be shared with the regulatory agency (MI Air Quality Division). Presently, MI's SBTCP cannot claim that this information is "confidential" unless a facility invokes a provision in MI's recently enacted "Environmental Audit Privilege and Immunity" law, which designates the terms of confidentiality between a facility and the regulatory agency in a "confidentiality agreement."</p> <p><i>Internal conflicts of interest</i><br/>The SBTCP works closely with the regulatory agency (MI Air Quality Division) as it develops and executes all of its program objectives. SBAP staff are included in and advised of all policy developments regarding state implementation of the CAA. MI's SBAP acts as an education, outreach, and marketing arm for the state's air quality program, and that role has assisted the SBAP in avoiding internal conflicts of interest.</p> |

**TABLE G-3  
(Continued)**

| <b>STATE OR<br/>TERRITORY</b> | <b>COI ISSUES AND RESOLUTIONS</b>   |
|-------------------------------|---|
| Minnesota                     | <p>SBAP has a signed memorandum of understanding (MOU) with the MPCA's enforcement programs. This MOU has been well respected by the enforcement programs, thus enabling the SBAP to provide consistent confidential compliance assistance to small businesses. The small business community is aware of the successful history of the MOU, and is comfortable with the relationship it has created between the SBAP and the MPCA's programs.</p> <p>The SBO, while not covered under the MOU, is able to operate confidentially and independently due to statutory language in the enabling legislation. This condition also has been well respected by the MPCA's enforcement programs, which has created trust in the SBO within the small business community.</p> |
| Mississippi                   | <p>The SBO and SBAP are regarded by DEQ as independent, confidential, and non-regulatory. Regulatory programs are regarding these programs as confidential to small businesses.</p> <p>On-site assistance is provided by an outside organization as authorized in EPA's Enforcement Response Policy for SBAP's option 2. Therefore, no written correspondence on the compliance status of a small business is maintained by the SBO or SBAP.</p>  |
| Missouri                      | <p>The regulatory programs and TAP have an understanding that regulatory programs cannot look at TAP's records unless a facility is under enforcement. If TAP finds a violation that is not an immediate threat to human health or the environment, recommendations are made to get the facility into compliance, but no report is turned over to the regulatory programs. If a violation that is an immediate threat to human health or the environment is encountered, the facility is notified that TAP must report this to the appropriate regulatory program. Facilities that come to TAP for assistance are favorably looked upon when it is discovered they need a permit and TAP assists them with attaining compliance.</p>                                  |
| Montana                       | <p>MT's SBO/SBAP follow the EPA's Compliance Incentives for Small Business Policy when dealing with its clientele.</p>  |
| Nebraska                      | <p>Not a problem in NE.</p>   |
| Nevada                        | <p>None defined.</p>  |
| New Hampshire                 | <p>The SBTAP's policy continues to offer businesses the option of remaining anonymous or taking advantage of the Compliance Incentives Policy. We continue to encourage businesses to use the Compliance Incentives Policy and have found the majority of businesses we deal with are indeed taking advantage of the Policy. We still work cooperatively with our state-level enforcement personnel to ensure those businesses that voluntarily approach the SBTAP are not subject to punitive enforcement actions if they agree to comply within a set time frame.</p> <p>As a general rule, the NH SBTAP discourages businesses from remaining "confidential," as they are not "protected" in the event they are subject to a random compliance inspection.</p>     |
| New Jersey                    | <p>SBAP has an agreement with NJDEP Enforcement that SBAP information is confidential. SBAP publicizes this in all collateral marketing material as well as at meetings, seminars, and verbally on the telephone.</p>   |

**TABLE G-3  
(Continued)**

| STATE OR TERRITORY | COI ISSUES AND RESOLUTIONS  |
|--------------------|---|
| New Mexico         | <p>NM SBAP does not offer confidentiality. However, any information that is observed by or revealed to the SBAP and claimed as a trade secret by the small business will be treated by the Environment Department to the extent allowable under State law. The procedure for identifying trade secrets to the Environment Department is described in NMED's Public Records and Inspection Policy.</p>   |
| New York           | <p>Confidentiality is key to the success of assistance programs designed to help businesses comply with environmental requirements. Recognizing this, New York State has designed its 507 programs to have the SBAP and the SBEO each located in non-regulatory state agencies. Further New York State assured the confidentiality of the small businesses working with the program by passing legislation that maintains under state law the confidentiality of their identity, location, and other plant information and protects this information from access under the Freedom of Information Law.</p> <p>In this way, companies can be frank in describing their problems without fear of reprisals or penalties. However, confidentiality is not a shield against enforcement that is conducted independently by the regulatory agency, but is in place to encourage more companies to discuss their problems so they may achieve compliance.</p> |
| North Carolina     | <p>Generally, the Department's policy of confidentiality for the Office of the Small Business Ombudsman has worked well. There have been several cases where we were helping a client submit an air quality application or do an assessment and identified unpermitted equipment. Air Quality sent a notice of violation or took enforcement action against the client soon after issuing the permit. This sends a signal that if you are trying to do the right thing and take initiative, you will still be punished. The Department has attempted to strengthen its enforcement program and some have interpreted giving a fine for everything as part of that policy. We need to better publicize that the self-confessor policy rewards voluntary efforts.</p>   |

**TABLE G-3  
(Continued)**

| STATE OR<br>TERRITORY | COI ISSUES AND RESOLUTIONS   |
|-----------------------|--|
| North Dakota          | <p>The environmental programs of the Department's Environmental Health Section have traditionally been compliance assistance oriented, with enforcement reserved for recalcitrant violations or where damage to health or the environment has occurred. Even prior to the establishment of the SBAP and SBO, the Department's emphasis has been on educating and assisting the regulated community to achieve compliance. With the establishment of the SBAP and SBO, the fundamental approach to compliance hasn't noticeably changed, but there has been more outreach activity.</p> <p>We don't know whether small businesses are reluctant to request assistance or confide in the SBO, since the ombudsman is housed in and employed by the Department of Health. Besides serving as the SBO, the ombudsman has other duties that support the administrative functioning (e.g., petroleum product quality testing program; coordinating emergency response, quality assurance, P2, and various staff training needs) of the Environmental Health Section. The SBO's assistance regarding enforcement matters has not been requested to date. The SBO has requested the Department's Chief of the Environmental Health Section to refer cases to the SBO when a small business expresses dissatisfaction or frustration in their dealings with the Department. This is an area that should receive continued monitoring and evaluation.</p> <p>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 as not disclosed to or sought to be disclosed from the SBAP. Information disclosed by small businesses to SBAP staff would not be turned over to the compliance program staff for enforcement purposes; however, a plan for correcting any violations would be developed. When needed, the SBAP will provide compliance assistance.</p> <p>In the opinion of the SBO and SBAP, confidentiality (disclosure of violations to enforcement staff) has really been a non-issue in ND.</p> |
| Ohio                  | <p>SBAP is physically separated from OEPA enforcement staff (different floors) and is not located at a district office where enforcement begins. SBAP files are kept in a separate area, and SBAP databases are accessible by SBAP only.</p> <p>SBAP has not experienced any problems with keeping information confidential. In some cases where the customer was referred by a district office because of violations, the SBAP has not spoken directly with the district to resolve the problem. This was done only with the prior approval of the company.</p> <p>In 1998, SBAP received a public records request under OH's Public Records Law from counsel representing a company that was in enforcement. (The company requested SBAP assistance after the District Office found violations, and the SBAP had repeatedly worked with the company for nearly two years to correct the problems.) Presumably, the company was attempting to claim the SBAP's recommendations as "official EPA findings" to invalidate the District Office violations. SBAP consulted OEPA legal staff, who determined that SBAP information was exempt from the Public Records Law. No SBAP files were given to either the company or enforcement staff.</p> <p>The SBO is located in a nonregulatory agency and provides a gateway to assistance not connected to OEPA. State statute establishing the program (SBO and SBAP) explicitly makes almost all information gathered by the program confidential (emissions data are excluded) and excludes use of any information in state enforcement actions.</p>   |

**TABLE G-3  
(Continued)**

| STATE OR TERRITORY | COI ISSUES AND RESOLUTIONS  |
|--------------------|---|
| Oklahoma           | The SBAP being housed in the nonregulatory Customer Service Division in our agency has allowed us to effectively develop trust with many businesses. Our group is supported very strongly by our Agency management and, as a result, we are provided with the tools we need to provide quality confidential assistance.   |
| Oregon             | <p>Information disclosed and minor violations discovered during on-site small business technical assistance visits are protected by state statute except when there is reasonable cause to believe there is clear and immediate danger to public health or safety of the environment. In accordance with state statute and the confidentiality option set forth in EPA's Office of Enforcement and Compliance Enforcement Policy, OR SBAP has adopted a written confidentiality policy. In summary, this policy allows the SBAP to:</p> <ul style="list-style-type: none"> <li>• Function independently of the enforcement section.</li> <li>• Restrict access to information and files of small businesses receiving technical assistance.</li> <li>• Keep businesses' names and locations in a separate, confidential file.</li> <li>• Perform follow-up consultations to assure resolution of violations discovered during on-site visits.</li> </ul> <p>This policy has prevented conflicts inside and outside the agency. To the contrary, it allows additional flexibility to bring small businesses into environmental compliance. For example, it allows the SBAP to assist a small business that faces enforcement through other channels by allowing staff to assist with P2, permit applications, and penalty mitigation via supplemental environmental projects. In such cases, OR's confidentiality policy is congruous with EPA's Policy on Compliance Incentives for Small Businesses.</p> |
| Pennsylvania       | The technical assistance program is operated by an outside contractor that keeps all of its clients confidential, thereby eliminating any potential conflict of interest.   |
| Puerto Rico        | This matter hasn't been addressed yet.  |
| Rhode Island       | RI DEM has been operating a non-regulatory technical assistance program since 1987. Since that time, we have worked with hundreds of companies and have gained the trust of many more. Conflicts of interest are avoided through close coordination with the regulatory Office of Air Resources. Coordination with our state's Economic Development Corporation also has been helpful in stressing our Office's pledge to work with industry on a confidential basis.   |
| South Carolina     | Upper management has supported the SBAP in part by informing the regulatory program areas of the services provided and encouraging the areas to use the SBAP as much as possible.   |
| South Dakota       | N/A   |
| Tennessee          | The regulated community accepts and respects the benefits of our program being confidential. The only differences of opinion that developed involved the use of company lists. We remained firm and were not challenged on any decisions.   |

**TABLE G-3  
(Continued)**

| STATE OR<br>TERRITORY | COI ISSUES AND RESOLUTIONS  |
|-----------------------|---|
| Texas                 | <p>TX's confidentiality policy states: <i>All contact with the Small Business Assistance Program is confidential, and the enforcement division of the TNRCC cannot seek information regarding these contacts.</i></p> <p>This policy has allowed us to work with our enforcement offices on a number of projects, such as the Metal Finishing and Auto Body/Auto Repair Initiatives, and still maintain the confidentiality of the businesses that contact us.</p> <p>Many businesses like our confidentiality policy and have commented that it gives them confidence and trust to call us. Usually, once a business uses our services, they will contact us again if necessary. Because we have a high satisfaction rate, we have a large number of repeat callers. However, even with the existence of the confidentiality policy, some small businesses are still hesitant to contact our office because they view us as regulators and do not realize that our office is independent from enforcement.</p>   |
| Utah                  | We use the EPA's policy as a model for compliance incentives for small business, which was issued May 20, 1996.   |
| Vermont               | We started with an internal policy on confidentiality, signed by the Commissioner of Environmental Conservation and have had no problems. In order for a regulator to access my files, they literally have to jump through hoops. As time goes on and businesses see that this trust is not breached, their trust in the system grows.  |
| Virginia              | <p>Confidentiality, as indicated in last year's report, is still not a major problem. This issue will take on more importance when the SBAP is able to provide voluntary site assessments as a part of normal program operations. The ability to deliver a quality product to the customer is only as good as the credibility of the provider. The ability to correct the deficiencies and non-compliance situations through the 507 Enforcement Policy provides a non-confrontational means for a business to achieve compliance. A business will respond when it feels it controls financial business decisions. Compliance through the 507 Enforcement Policy can be put into the category of a smart business decision. In this regard, the DEQ has at its disposal EPA's Section 507 Enforcement Policy.</p> <p>Within DEQ, the SBO/SBAP continues to maintain an excellent working relationship with the Enforcement and Compliance Office, which also helps to ensure an understanding of the needs on both sides of compliance enforcement issues. We both recognize that compliance is the ultimate goal, and compliance assistance can become, and is, a means to that end.</p> |
| Virgin Islands        | We have separated the various sections of DPNR.   |
| Washington            | This has never been a problem.  |

**TABLE G-3**  
**(Continued)**

| STATE OR<br>TERRITORY | COI ISSUES AND RESOLUTIONS  |
|-----------------------|---|
| West Virginia         | <p>SBAP operates separately and independently from the enforcement group of the agency. Also, the SBAP currently is housed in a separate physical location. To better help small businesses, enforcement refers some violators to the SBAP for technical assistance to facilitate compliance. The SBO also intervenes in specific enforcement actions to ensure that small businesses are fairly treated. SBAP does not refer any cases to Enforcement, except in the case of imminent danger. However, to ensure that compliance is eventually achieved, the SBAP will make on-site assessment files available to enforcement after an eighteen month grace period. The business is not shielded from enforcement actions related to violations independently discovered by state (or federal) inspectors during this period. Such independent discovery may occur through routine inspection activity or complaint investigation.</p> <p>The DEP director has given strong assurances that the confidentiality of all assistance programs shall be respected.</p> |
| Wisconsin             | <p>WI SBAP/SBO is a cooperative effort between the WI Department of Natural Resources (DNR) and the non-regulatory component of the WI Department of Commerce (Commerce). The primary responsibility for interacting with businesses rests with Commerce staff. A memorandum of understanding has been established between Commerce and DNR that allows businesses to speak to Commerce staff on a confidential basis. As a rule, we ask customers if they do not want to be identified if we have to discuss their situation with a DNR representative.</p>  |
| Wyoming               | <p>This issue of confidentiality has been addressed in a draft policy that allows the Office of Outreach to hold in confidence contacts and conversations. This confidentiality does not offer protection from discovery, but rather is a personal commitment not to divulge information to others. In the event that the Outreach staff appear as witnesses in any legal action, any oral communication or contacts may be disclosed. The Outreach staff must report through proper channels serious problems noted, including public health risks, safety problems, or criminal activity. Contacts with the Office of Outreach involving or requiring the documentation of problems encountered may be referred to Department regulatory staff. Office documentation developed through customer interaction is not confidential and will be available to the public.</p>  |

**TABLE G-4**  
**EPA's POLICY ON COMPLIANCE INCENTIVES FOR SMALL BUSINESSES/SMALL COMMUNITIES**

SBTCPs were asked if their program used EPA's Policy on Compliance Incentives for Small Businesses or a comparable state policy for small businesses/small communities. Individual program responses are shown below.

| PROGRAM              | SMALL BUSINESS POLICY ACTIVITIES   | SMALL COMMUNITY POLICY ACTIVITIES   |
|----------------------|--|---|
| Alabama              | N/R  | N/R   |
| Alaska               | When facilities request on-site compliance assistance, they are also agreeing to implement any compliance "to do" action items identified during the site visit. Facilities are provided with an initial 90-day correction period with an opportunity for extending this time frame. An extension request needs to be communicated in writing. The terms are negotiated depending on the circumstances. Extension terms are similar to the EPA 507 policy. | The Division of Statewide Public Service is developing a small community compliance assistance program that includes compliance incentives that generally are consistent with EPA's approach. This program currently is in the design and pilot-test phase. |
| Arizona              | ADEQ has adopted the Enforcement Waiver Policy (Small Business), which waives penalties if business meets similar criteria as in EPA policy. ADEQ policy does not address economic benefit. No business has applied for the policy as of this time.  | N/R   |
| Maricopa Cty         | N/A  | N/A   |
| Arkansas             | AR developed a "voluntary compliance" policy based on national policies. Works well. Did not impact regulatory enforcement program as first feared.  | N/R   |
| California           | N/R  | N/R   |
| South Coast          | Staff goes to the company and identifies whether they need a permit. Provides technical assistance as needed, helps submit forms, and follows-up. To date, all small businesses have come into compliance that have received this help.  | N/A   |
| Colorado             | None. Some programs initiating in 1999 may fit in this category.   | N/R   |
| Connecticut          | CT developed sector-specific policies tailored to specific compliance goals. Enforcement policies were developed specifically for auto body refinishing and gas stations.  | N/R   |
| Delaware             | DE has a Penalty Mitigation Policy that has seen limited use by business and industry during 1998. Its use is not limited to small business. In fact, businesses with more than 100 employees have been the largest users of the policy.   | N/R   |
| District of Columbia | N/R  |   |



**TABLE G-4  
(Continued)**

| <b>PROGRAM</b> | <b>SMALL BUSINESS POLICY ACTIVITIES</b>  | <b>SMALL COMMUNITY POLICY ACTIVITIES</b>  |
|----------------|--|---|
| Florida        | This policy was not in place in 1998, but will be considered in 1999.  | There is a Small Community coordinator position in the office of the Secretary; however, it is not part of the SBO/SBAP office. |
| Georgia        | GA has not used EPA's Policy on Compliance Incentives for Small Businesses or Small Communities.   | N/R   |
| Hawaii         | SBO disseminated details of EPA/DOH compliance incentive/enforcement policy to all focus groups, technical assistance, and individual contacts.  | N/R   |
| Idaho          | None   | None  |
| Illinois       | N/R  | N/R   |
| Indiana        | N/A  | N/R   |
| Iowa           | <p>We have not used the EPA policy with any of our clients yet. We have a state amnesty policy applicable only to state construction permit requirements. The IAEAP and IDNR formulated that policy in 1997 and set a deadline of July 1, 1997 for sign up. At that time, 167 businesses signed up, and we are still working with businesses on that list.</p> <p>Since then, we have a more general amnesty policy in place. In the last two years, approximately 50 businesses have taken advantage of this policy. We are in the process of implementing a newly approved self-audit state law that will supersede the previous amnesty policies.</p> | N/R   |
| Kansas         | N/R  | N/R   |
| Kentucky       | N/A  | N/A   |
| Jefferson Cty  | N/R  | N/R   |
| Louisiana      | The policy is available, but we have not had an occasion to use it.  | N/R   |
| Maine          | 17 companies have used the policy since its adoption in 1995. One wood products company used the policy in 1998 due to hazardous waste violations discovered during an on-site assessment.   | N/R   |
| Maryland       | N/A  | N/A   |

**TABLE G-4  
(Continued)**

| PROGRAM       | SMALL BUSINESS POLICY ACTIVITIES   | SMALL COMMUNITY POLICY ACTIVITIES                              |
|---------------|--|--|
| Massachusetts | <p>EPA's policy requires self-reporting and has not seen much use. Businesses are reluctant to self-report. DEP's policy does not require self-reporting, but it is only applicable to businesses with 10 employees or less.</p> <p>Our autobody "Crash Course" promoted the use of existing good faith penalty mitigation policies. The advantages are: no self-reporting is required, it is applicable to any size facility, and no amnesty is promised. Thus, the enforcement agency retains discretion to set penalties when justified by economic benefit, seriousness of harm, or any other consideration.</p> | No information available.                                      |
| Michigan      | MI SBAP is in the early stages of using both the MI and EPA enforcement policies by working with companies that have both state and federal violations.  | N/A  |
| Minnesota     | N/R  | N/R  |
| Mississippi   | N/A  | N/A  |
| Missouri      | Not used.  | Not used.  |
| Montana       | The MT SBO/SBAP have used the policy in granting certain protections from enforcement action to small businesses that work with the program to achieve compliance. Businesses appreciate the guarantee of protection along with the free technical assistance offered by the program.  | Have not had an opportunity to use the small community policy. |
| Nebraska      | None.  | N/R  |
| Nevada        | None requested.  | None requested.  |
| New Hampshire | We utilize the Compliance Incentives Policy as a guiding rule for program operation. We strongly encourage businesses to take advantage of the policy, as it affords "protection" against punitive actions and rewards proactive activities. We continue to develop a more formalized approach to its use (i.e., a written request to take advantage of the policy and an MOU between the program and state Enforcement Section).  | N/R  |
| New Jersey    | N/A  | N/A  |
| New Mexico    | N/R  | N/R  |

**TABLE G-4  
(Continued)**

| PROGRAM        | SMALL BUSINESS POLICY ACTIVITIES  | SMALL COMMUNITY POLICY ACTIVITIES |
|----------------|---|-----------------------------------|
| New York       | The SBEO tried to bring one client into compliance using EPA's Small Business Policy. The business was a major source with uncontrolled emissions that wanted to undertake a P2 project that would make his facility a minor source within 1 year. When approached with the case, the EPA did not believe that the source would be accepted into the policy, because having uncontrolled emissions in the past, it would be considered a significant violator, and therefore, not eligible. The EPA also warned that the source could not be protected from enforcement by New York State, which does not have a voluntary compliance policy. As a result, the business has not yet come forward to the regulatory authorities, and the business has not yet undertaken its P2 project. Conversations are still taking place with EPA and New York State officials to find a solution to this case. | N/R                               |
| North Carolina | NC has a confidentiality policy, but does not apply EPA small business policy requirements. That specifically relates to reducing penalties.  | N/A                               |
| North Dakota   | None.   | N/R                               |
| Ohio           | None.   | N/R                               |
| Oklahoma       | We have an internal agency policy similar to EPA's that allows us to waive civil penalties for those facilities that come forward. This policy may be invoked by a business under certain circumstances only.   | N/R                               |
| Oregon         | None.   | None.                             |
| Pennsylvania   | N/R   | N/R                               |
| Puerto Rico    | N/R   | N/R                               |
| Rhode Island   | None.   | None.                             |
| South Carolina | N/R   | N/R                               |
| South Dakota   | None.   | N/R                               |
| Tennessee      | TN developed a self-policing and voluntary correction policy. This policy was developed using the SAP compliance incentives for small businesses. The provision allows a company to correct a compliance problem provided certain conditions are met.   | N/R                               |

**TABLE G-4  
(Continued)**

| PROGRAM        | SMALL BUSINESS POLICY ACTIVITIES  | SMALL COMMUNITY POLICY ACTIVITIES   |
|----------------|---|---|
| Texas          | OCE does not have any policies exclusively for small businesses. However, the majority of enforcement actions initiated in the regional offices that are informally resolved involve small businesses. Informal resolution means that the violations were resolved between the inspector and the entity without the case going through the formal enforcement process and without the assessment of a penalty. Based on data obtained from the Enforcement Division's annual report for FY98, 51,795 enforcement actions involving small businesses were informally resolved. | N/A. Agency's Local Government Assistance Program handles compliance assistance for small communities.  |
| Utah           | N/R   | N/R   |
| Vermont        | None.   | N/R   |
| Virginia       | None in this reporting year.  | None.   |
| Virgin Islands | N/R   | N/R   |
| Washington     | N/R   | N/R   |
| West Virginia  | None at this time.  | N/R   |
| Wisconsin      | The flexibility already built in to the WI DNR's stepped enforcement policy makes existing federal compliance incentives redundant. Our DNR has chosen not to implement this policy.  | N/A   |
| Wyoming        | The Department has its "Small Business Voluntary Disclosure and Compliance Incentive Rule" in place, which mirrors the EPA policy and is applicable to multimedia. The basics of this Rule have been published in our newsletter and in handout material provided to businesses during on-site visits and in public displays and presentations. The Rule has generated limited interest in the small business community and led to a handful of positive responses this year.   | The Department has not developed a formal policy for small communities. However, it is policy of the Department not to seek penalties when municipalities work to come into compliance. |

**TABLE G-4  
(Continued)**

| Program     | Small Business Policy / Small Communities Policy |  |   |                                      |
|-------------|--|--|---|--------------------------------------|
|             | # Small Entities Qualifying Under the Policy     | # Small Entities Attempting to Use Policy, Still Under Consideration | # Small Entities Attempting to Use Policy, But Not Qualifying | Total \$ Amount of Penalties Reduced |
| AL          | N/R  |  |   |                                      |
| AK          | N/R  |  |   |                                      |
| AZ          | N/R  |  |   |                                      |
| Maricopa    | N/R  |  |   |                                      |
| AR          | No reporting data maintained.                    |  |   |                                      |
| CA          | N/R  |  |   |                                      |
| South Coast | 156/   |  |   |                                      |
| CO          | N/R  |  |   |                                      |
| CT          | Not used   | None   | None  | None                                 |
| DE          | N/R  |  |   |                                      |
| DC          | N/R  |  |   |                                      |
| FL          | N/A  |  |   |                                      |
| GA          | N/R  |  |   |                                      |
| HI          | N/R  |  |   |                                      |
| ID          | N/R  |  |   |                                      |
| IL          | N/R  |  |   |                                      |
| IN          | N/R  |  |   |                                      |

N/A Not applicable    N/R No response

**TABLE G-4  
(Continued)**

| Program  | Small Business Policy / Small Communities Policy |  |   |                                      |
|----------|--|--|---|--------------------------------------|
|          | # Small Entities Qualifying Under the Policy     | # Small Entities Attempting to Use Policy, Still Under Consideration | # Small Entities Attempting to Use Policy, But Not Qualifying | Total \$ Amount of Penalties Reduced |
| IA       | N/R  |  |   |                                      |
| KS       | N/R  |  |   |                                      |
| KY       | N/R  |  |   |                                      |
| Jeff Cty | N/R  |  |   |                                      |
| LA       | N/A  |  |   |                                      |
| ME       | 1/   | 0/   | 0/  | unknown/                             |
| MD       | N/R  |  |   |                                      |
| MA       | Info not available                               |  |   |                                      |
| MI       | N/A  |  |   |                                      |
| MN       | N/R  |  |   |                                      |
| MS       | N/R  |  |   |                                      |
| MO       | N/R  |  |   |                                      |
| MT       | 7/   | 0/   | 1/  | N/A                                  |
| NE       | N/R  |  |   |                                      |
| NV       | N/R  |  |   |                                      |
| NH       | Not tracked/NA                                   |  |   |                                      |
| NJ       | N/R  |  |   |                                      |
| NM       | N/R  |  |   |                                      |
| NY       |  |  | 1/  |                                      |

N/A Not applicable    N/R No response

**TABLE G-4  
(Continued)**

| Program | Small Business Policy / Small Communities Policy |  |   |                                      |
|---------|--|--|---|--------------------------------------|
|         | # Small Entities Qualifying Under the Policy     | # Small Entities Attempting to Use Policy, Still Under Consideration | # Small Entities Attempting to Use Policy, But Not Qualifying | Total \$ Amount of Penalties Reduced |
| NC      | N/R  |  |   |                                      |
| ND      | N/R  |  |   |                                      |
| OH      | N/A  |  |   |                                      |
| OK      | Do not track information                         |  |   |                                      |
| OR      | N/R  |  |   |                                      |
| PA      | N/R  |  |   |                                      |
| PR      | N/R  |  |   |                                      |
| RI      | N/R  |  |   |                                      |
| SC      |  | 1/   |   |                                      |
| SD      | N/R  |  |   |                                      |
| TN      | 12/  | 12/  | 1/  |                                      |
| TX      | Not tracked                                      |  |   |                                      |
| UT      | N/R  |  |   |                                      |
| VT      | N/R  |  |   |                                      |
| VA      | N/R  |  |   |                                      |
| VI      | N/R  |  |   |                                      |
| WA      | N/R  |  |   |                                      |
| WV      | N/R  |  |   |                                      |
| WI      | N/A  |  |   |                                      |

**TABLE G-4**  
**(Continued)**

| Program | Small Business Policy / Small Communities Policy                                 |  |   |                                      |
|---------|--|--|---|--------------------------------------|
|         | # Small Entities Qualifying Under the Policy                                     | # Small Entities Attempting to Use Policy, Still Under Consideration | # Small Entities Attempting to Use Policy, But Not Qualifying | Total \$ Amount of Penalties Reduced |
| WY      | Several sought help under this rule, but none actually required penalty relief./ |  |   |                                      |