

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

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

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

INSTRUCTIONS FOR COMPLETING THIS FORM

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

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

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

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

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

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

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

ATTN: SBTCP Annual Report

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

Completed forms are due by February 15, 1998.

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

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

WHY ARE WE REQUESTING THIS FORM?

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

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

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

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

SUGGESTIONS FOR COMPLETING THIS FORM

- Gathering information for this report is definitely a team effort! You may wish to provide hard copies of this form to key contacts from the SBO, the SBAP, and the CAP, and indicate who will be responsible for the various parts of the report. Once all information is collected, one person should take responsibility for completing and submitting this form (most likely the SBO).

- We are looking to collect objective information on each state SBTCP. This report is not meant to be an evaluation of any facet of your program.

- We are seeking information you should be already collecting for you own purposes. We are not asking you to create information you do not have. If a question asks for information you do not have, please provide a brief explanation as to why the information is not available.

- You may wish to refer to last year's Report to Congress and the information you provided on your Reporting Form last year when completing this year's Reporting Form.

- For future reports, you are encouraged to continually gather your statistics during the reporting period. Based on the information requested in this Form, you may need to revise the types of statistics you track for your SBTCP for subsequent years.

SECTION 1 SOURCE OF THE INFORMATION

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

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

Georgia

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

1997

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

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

	PRIMARY CONTACT	ALTERNATE CONTACT
Name	Marvin M. Lowry	Anita Dorsey-Word
Title	Ombudsman/Program Manager	Coordinator
Relationship to SBTCP	SBO	SBAP Coordinator
Organization	DNR/EPD/Air/SBAP	DNR/EPD/Air/SBAP
Address	4244 International Parkway	4244 International Parkway
Address	Suite 120	Suite 120
City, State, Zip	Atlanta, GA 30354	Atlanta, GA 30354
Telephone Number	404/362-2656	404/362-4842
Facsimile Number	404/363-7100	404/363-7100
E-mail	marvin_lowry@mail.dnr.state.ga.us	anita_dorsey-word@mail.dnr.state.ga.us

SECTION 2 STATUS, BUDGETS, STAFFING, ORGANIZATION

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

STATUS

2.1 When was your SBTCP established?

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

SBTCP Component	Month and Year of Establishment
SBO	February 1992
SBAP	November 1992
CAP	May 1993

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

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

SBTCP Component	Month and Year Operations Began
SBO	July 1992
SBAP	July 1993
CAP	November 1994

BUDGETS

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

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

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

	1997 BUDGET (\$)	SOURCE OF FUNDING (please describe)
SBO	65,000	Title V Fees
SBAP	115,000	Title V Fees
CAP	10,000	Title V Fees
TOTAL	190,000	Title V Fees

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

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

	1996 BUDGET (\$)	1998 PROJECTED BUDGET (\$)
SBO	65,000	Title V Fees
SBAP	115,000	Title V Fees
CAP	10,000	Title V Fees
TOTAL	190,000	Title V Fees

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

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

No changes were noted.

STAFFING

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

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

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

SBO Function	Number of FTEs
SBO	.5
Other staff	.5
TOTAL STAFF	1.0

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

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

SBAP Staff	Number of FTEs
Paid	2
Unpaid Volunteers	0
Retired Engineers	.5
TOTAL STAFF	2.5

2.8 How many people are currently serving on your CAP?

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

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

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

AFFILIATION	NUMBER OF PEOPLE ON CAP
Owner (or representative) of small business	3
State regulatory agency	1
General public	0
Not yet appointed	3
Other (please specify)	None

ORGANIZATION

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

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

SBTCP COMPONENT	BRIEF DESCRIPTION OF ADMINISTRATIVE LOCATION
SBO	EPD/Air Protection Branch
SBAP	EPD/Air Protection Branch
CAP	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.

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

If YES, please complete Question 2.11.

YES	
NO	X

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

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

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

**SECTION 3
SERVICES PROVIDED/ACTIVITIES CONDUCTED**

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

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

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

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

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

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

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

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

If you tally statistics separately for your SBO and SBAP, please complete Table A, which follows. If you combine your statistics for your SBO and SBAP, please complete Table B.

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

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

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

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

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

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

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

TABLE A	*Other - Please list
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SBO	
SBAP	

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

TABLE B	Number of Services Provided / Number of Persons or Businesses Reached													
	Hotline Calls		On-site Visits		Seminars, Workshops, Speaking Events		Meetings		Brochures, Manuals, Information Packets		Newsletters		Mailings and Correspondence	
Combined Program	450	450	6	7	20	300	70	200	12	10,000	2	7000	20	20

TABLE B	Number of Services Provided / Number of Persons or Businesses Reached													
	P2 Assistance		Information Booths		Teleconferences		Press Releases and Media Coverage		Regulatory Overview		Permit and Compliance Assistance		Other*	
Combined Program	11	11	0		2	30	1	1000	2	300	13	13	200	400

TABLE B	*Other - Please list.													
Combined Program	Drycleaning Video (200 videos distributed)													

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

YES	X
NO	

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

http://ganet.ganet.org/dnr/environ/branches/airprot/smallbiz.html

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

The program does not count the number of times the site is visited.

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

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

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

Was it helpful to its users?

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

We have not received any comments on the SBAP's home page.

COMPLIANCE ADVISORY PANEL

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

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

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

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

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

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

MEETINGS BETWEEN WHOM	NUMBER OF MEETINGS DURING THE REPORTING PERIOD	FREQUENCY (Please indicate if monthly, quarterly, biannually, etc.)
SBO and SBAP	26	Weekly
SBO and CAP	4	Quarterly

SBO and CAP and SBAP	4	Quarterly
SBAP and CAP	4	Quarterly

OTHER SERVICES/CONDUCT OF ACTIVITIES

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

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

YES	<input type="checkbox"/>
NO	<input checked="" type="checkbox"/>

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

DATE AVAILABLE	NAME OF GRANT OR LOAN PROGRAM	FUNDING LEVEL

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

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

SBTCP COMPONENT	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED
SBO	The SBO position is now a part-time position. The SBO retired in October from the Division and was reappointed to work part-time. A secretary supports the SBAP part-time.
SBAP	2 Environmental Protection Division Full Time Associates 1 Retired Engineer works part-time

SBTCP COMPONENT	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED
CAP	N/A

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

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

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

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

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

PAPERWORK REDUCTION ACT	Please check all appropriate boxes
Routine review of SBTCP documents for compliance	X
Receiving/providing information electronically	X
Simplified/consolidated permits or forms	X

Eliminating unnecessary permits by increasing exemptions for insignificant actions	
General permits for certain types of industries	X
Concise, easy-to-read summary documents	X
Other (please list)	

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

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

SECTION 4 PROGRAM EFFECTIVENESS

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

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

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

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

<p>"I am so glad that you all exist".</p> <p>"It's about time that the Divison had a program like this one".</p> <p>"Of the drycleaners that we (EPD) inspected, only the ones that Phillip (SBAP) assisted were in compliance. "</p> <p>"... Do the right thing without criticism".</p> <p>"Allow those over 100 employees to use your services. Your asistance has allowed us to grow & soon (1-5 years) we will likely be over 100 employes".</p>
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4.2 What was the nature of the complaints received/initiated by the SBO or the CAP, and how were they resolved?

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

COMPLAINTS	RESOLUTION OF COMPLAINTS
<p>The SBAP received a request from the Savannah regional Office to ensure that they were treating a small business owner fairly and that all options had been considered because of pending enforcement actions. The small business in question had a pile of scrap veneer on his property.</p> <p>According to the regional office, the scrap pile had been their more than thirty years. The business owner purchased the business in January '96 and inherited the problem.</p>	<p>The SBAP resolved the problem by getting all parties to allow the small business owner to dispose of the current pile by using an air curtain destructor. The business owner was given thirty days to correct the problems. All parties agreed to this solution.</p>

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

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

The SBAP published a newsletter. The newsletter featured articles on the SBAP. Ombudsman, Section 112 R issues, Regulatory updates and an event calendar. Two issues were mailed to approximately 7000 small businesses.

The SBAP co-hosted the first Region IV Small Business Conference in October.

The SBAP prepared 3 compliance assistance documents in 1997. The documents were prepared for the commercial printers, commercial bakeries and Stage I & Stage II facilities.

The SBAP, CAP & SBO met four times during 1997.

The CAP chairperson and the SBAP Coordinator attended the second CAP training for SBAP's Compliance Advisory Panel members and the small business liaisons in Scottsdale, AZ.

The SBAP Coordinator represented the Region IV States at the third annual Small Business Liaison Conference in Arlington, VA.

The SBAP developed and mailed a survey to all 50 states & U.S. territories to learn the level of multimedia activities in other states and gain an understanding of the problems encountered in starting a multimedia program.

The SBAP is representing the Air Branch in a multimedia initiative designed to prepare a compliance assistance manual for the automotive repair industry.

The SBAP hosted a focus group meeting with stakeholders from Georgia and Florida. The purpose of the meeting was to establish a compliance assistance center for the chemical industry.

The SBAP compiled a glossary of commonly used environmental terms for in-house use. At the National Ombudsman's request, we mailed the glossary to EPA headquarters for inclusion on Karen Brown's web site. We also sent a copy of the "Permit Guide for Commercial Bakeries" for inclusion on the website.

The SBAP mailed a drycleaning brochure to 1000 facilities requesting perc usage data, offering videos for training, and notifying them of upcoming compliance inspections. We received more than 200 request for videos and information on perc usage.

The SBAP mailed letters to hard chromium users reminding them that the notification of compliance status form was due on February 24, 1997. All of the hard chromium users responded and all were in compliance.

SECTION 5 COMPLIANCE ASSURANCE

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

5.1 What is the total number of eligible facilities identified by your program, by industry sector, that have received assistance by your program from January through December 1997?

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

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

	A	B	C	D	E
INDUSTRY SECTOR	# OF GENERAL ASSISTANCE	# OF ON-SITE ASSISTANCE	TOTAL # OF FACILITIES ASSISTED (A+B)	# OF ELIGIBLE FACILITIES IN YOUR STATE	% OF TOTAL ELIGIBLE POOL OF FACILITIES (C/D)*100
<i>Example: Dry Cleaners</i>	71	14	85	400	21%
Dry Cleaners	209	2	211	661	32%
Commercial Printers	69	1	70	3168	2%
Automotive Repair	7	1	8	4468	0.1%
Wood Furniture	3	0	3	700	0.4%
Stage I & II Facilities	1050		1050	2000	52%
Commercial Bakeries	70	0	70	70	100%
112 (r)	31	0	31	1000	3%
Hospitals--Medical Waste Incinerators	238	0	238	238	100%

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

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

Common Compliance Problems	Please check all appropriate boxes
Not understanding regulatory requirements	X
Operating without a permit	X
Incomplete recordkeeping	X
Uncertain of permitting requirements/need for multiple permits	X
Uncertain how to determine emission inventories/general lack of technical experience	X
Uncertain how to complete forms/complicated paperwork	X
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	X
Failure to use or find the right equipment to comply with applicable standards	
Other (please list)	

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

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

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

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

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

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

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

I would recommend that all of the 507 programs become multimedia. This could possibly eliminate the duplication of services by the various program that are springing up to fill the void in the 507 programs. I would also relax the definition of a small business to include all sources with less than 100 employees regardless of the amount of emissions.

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

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

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

The SBAP avoids the discussion of confidential material with compliance enforcement personnel. When discussions are unavoidable, the business names are not used: or, circumstances are presented and assurances are secured before any sensitive materials are discussed.

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