

INFORMATION COLLECTION REQUEST

for

Auto Body Compliance Assessment Pilot Project

Supporting Statement (Parts A and B)

Re-submitted by

The United States Environmental Protection Agency

August 2009

ICR SUPPORTING STATEMENT: Part A

Auto Body Compliance Assessment Pilot Project

1. Identification of the Information Collection

1 (a) Title of the Information Collection:

Auto Body Compliance Assessment Pilot Project; EPA ICR Number 2344.01

1 (b) Abstract:

This is a request for approval of a new Information Collection Request (ICR). The purpose of the ICR is two-fold. First, it is to authorize the collection of information as part of a pilot study undertaken by the U.S. Environmental Protection Agency (EPA) to evaluate whether and how EPA's specific compliance assistance activities in Region 1 helped owners or operators of auto body shops improve their operations. The ICR would authorize the administration of surveys, by telephone and on-site, to a random sample of auto-body shops subject to Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (NESHAP Subpart HHHHHH, hereinafter referred to as the Surface Coating Rule). Specifically, the study has been designed to assess whether or not the assistance provided helped owners or operators understand these and other applicable environmental regulations, and whether or not the assistance helped owners or operators implement operational changes that improved environmental practices; including changes in behavior that resulted in the auto body shop either returning to compliance with regulations or taking steps toward achieving compliance.

EPA has two objectives in collecting this information for the pilot study: (1) EPA's primary objective is to assess the degree to which its compliance assistance activities can be correlated to improved environmental performance at auto body shops; (2) EPA's secondary objective is to assess the validity of environmental performance information collected by telephone surveys. The Agency frequently relies on telephone surveys to gather information about environmental performance, but such self-reported data may not be accurate, and may suffer from non-response bias. The design for this study addresses both concerns and is explained fully in Part B

The second use for this ICR is to authorize the use of these surveys to collect anecdotal information as part of the Agency's efforts to assess outcomes associated with the Office of Air Quality Planning and Standard's Collision Repair Campaign (CRC). The CRC is a two-year campaign during which the EPA Headquarters Office of Air Quality Planning and Standards (OAQPS) and the ten EPA Regions will address health threats by reducing toxic auto body coating emissions at the national level. Each EPA regional office involved in the campaign will work with its respective partners (e.g. community, industry, small businesses, etc.) to help shop owners reduce paint, solvent and related hazardous waste disposal costs. The CRC also aims to achieve enhanced compliance with the Surface Coating Rule by encouraging shops to reduce pollutant emissions early and to levels beyond those required by the rule. The CRC team will use the surveys to collect anecdotal information about the use of emission reduction best practices at auto body shops and measure the effectiveness of particular outreach, education, and training activities undertaken as part of the CRC. The team will use that information to judge the success and efficacy of the specific outreach activity surveyed, and information collected can be

used to help improve program implementation. The methodologies explained in Part B will not be used for the CRC anecdotal data collection efforts.

Description of the Auto Body Compliance Assessment Pilot Project

The universe of auto body shops in Region 1 is comprised of over 5,000 shops. This project will target a population of roughly 1,700 eastern Massachusetts auto body shops selected for this study on the basis of specific geographic, demographic, and risk-based factors described in Part B of the supporting statement. The assistance provided to the auto body shop owner/operators may include: (1) basic information about the applicable regulations in the form of guidance documents, brochures and presentation material; (2) compliance assistance workshops in the communities where auto body shop are located; and (3) compliance assistance visits to individual auto body shops. A short time after the assistance is provided (within 3 months), EPA will oversee the collection of information, using the surveys that are included in this proposal, to determine if the compliance assistance provided was helpful and how the assistance correlates to any changes in behavior.

EPA's pilot study will include two distinct evaluations of the impact of compliance assistance on auto body shop behavior: one will focus on the short-term impact of compliance assistance outreach and workshops, while the other will focus on the long-term impact of a comprehensive package of compliance assistance activities (outreach, workshops, and shop visits). By "short-term" effects, we refer to changes in shop behavior EPA can expect to observe within approximately one to three months of outreach and workshop completion. The expected short-term effects primarily will be changes associated with compliance assistance related to Resource Conservation and Recovery Act (RCRA) requirements already in effect. The behavior changes related to the Surface Coating Rule are expected to occur over a longer time frame, as most provisions of that rule do not become effective until 2011.

For both the short-term and the long-term evaluations, EPA personnel will conduct on site surveys at a random sample of shops to gather information regarding shop performance on key RCRA and Clean Air Act indicators. EPA will use this information to estimate the performance¹ of shops in both the treatment and comparison groups. Examples of the types of shop performance that will be assessed include proper hazardous waste container management, use of efficient spray-coating equipment, employee training on the use of spray coating equipment, and proper maintenance of particulate filters. In addition, as described below, EPA will evaluate the validity of performance data obtained through telephone surveys by combining a telephone survey with follow-up site visits, as part of the short-term experiment. If the information collected by telephone survey proves to be sufficiently accurate, the results will be used to improve the precision associated with shop performance measurement and the use of telephone surveys will be expanded later in the study.

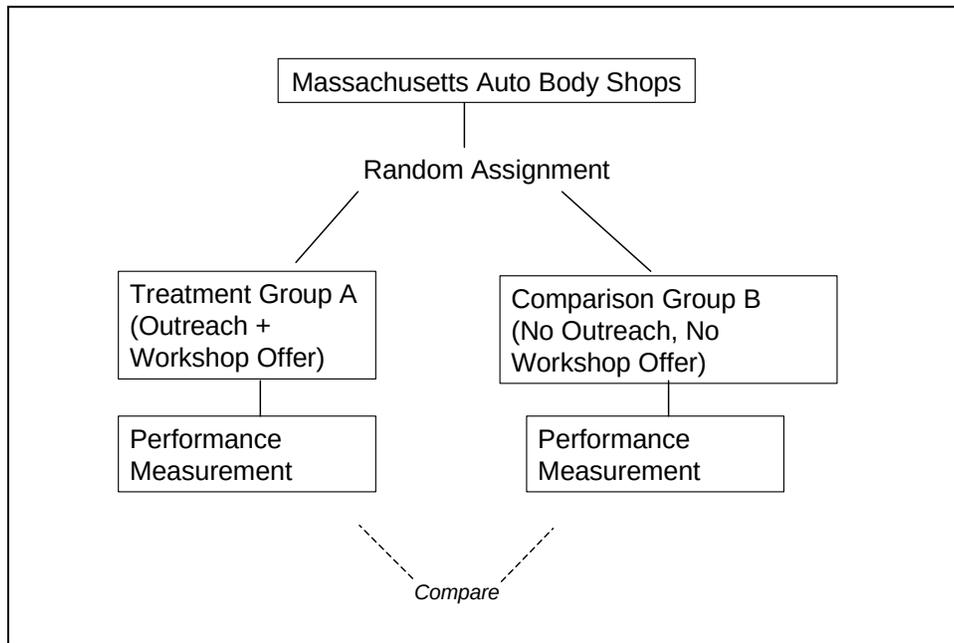
EPA will evaluate the short-term impact of compliance assistance outreach and workshops by means of a random-assignment experiment involving several hundred eastern Massachusetts auto body shops in areas with elevated air toxics risks. All Massachusetts shops in this population will be randomly assigned either to Group A, which will receive treatment, or to Group B, which will receive no treatment during the course of the short-term evaluation and will serve as a comparison group (see Exhibit A-1). The random assignment process will ensure that the two groups are statistically equivalent with respect to observed and unobserved factors. The shops in the Group A will be sent a RCRA-related fact sheet and

¹ We use the term "performance" throughout this document to represent facilities' environmental management behaviors; some aspects of performance may be related to current regulatory requirements, while other aspects of performance may be purely voluntary, or may be required in the future.

offered an opportunity to participate in compliance assistance workshops focused on federal surface coating requirements and, to a very limited degree, RCRA issues. The shops in Group B, the comparison group, will not receive the RCRA fact sheet, and will not be invited to the workshops.^{2,3}

Shortly after the Group A workshops have been completed, EPA personnel will visit a random sample of shops from both Group A and Group B to assess performance. The impact of compliance assistance will be assessed by comparing the estimated performance on key indicators for Group A to the estimated performance on these indicators for Group B.

Exhibit A-1: Assessing Short-Term Impact of Compliance Assistance Outreach and Workshops



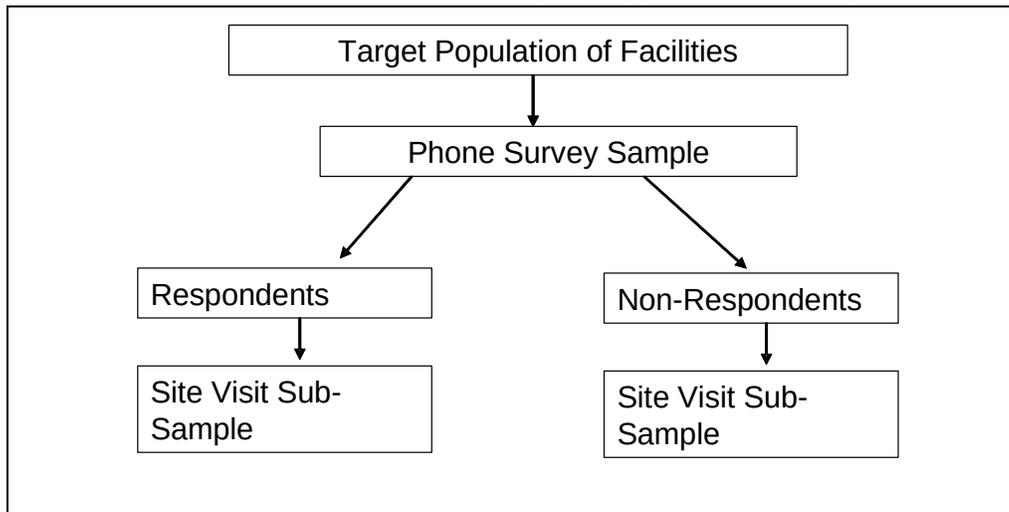
² Workshops will be offered to the comparison group facilities shortly after the survey described above has been completed to ensure that all facilities ultimately have the opportunity to participate. If any facilities in the comparison group learn about the earlier series of workshops and indicate to EPA that they would like to participate, they will be encouraged to attend workshops at a later date. If they insist on attending the earlier series of workshops, they will be allowed to do so and tracked as “crossovers” for the analysis. We anticipate that only a small number of facilities, if any, will insist on attending the earlier series of workshops.

³ Facilities in both the treatment group and the comparison group received a postcard in March 2009 informing them of pending Surface Coating Rule requirements. This postcard represents a limited form of outreach that EPA staff does not anticipate will substantially impact facility performance in the short-term.

Concurrent with the evaluation of the short-term evaluation impacts of compliance assistance, EPA will assess the validity of the telephone surveys using a two-phased approach. The first phase will consist of telephone surveys of random samples from Groups A and B. The telephone survey will gather information related to shops' behaviors with regard to key RCRA and air indicators. For the second phase, EPA will conduct on-site surveys to verify the accuracy of the information the shop provided in its telephone survey. The Group A and Group B samples of shops that were contacted for a telephone survey will be divided into sub-groups: 1) shops that responded to the telephone survey ("respondents") and 2) shops that did not respond to the telephone survey ("non-respondents"). EPA will draw random samples from each of these subgroups, and site visits will be conducted at the sampled shops. Exhibit A-2 illustrates how the two-phased sampling approach would work within Group B.⁴

During these site visits, EPA personnel will assess shop performance through direct observation and, as needed, a review of on-site records. Site visits at respondent shops will allow us to adjust for any potential self-reporting bias in the telephone survey, while site visits at non-respondent shops will allow us to adjust for any potential non-response bias. By comparing performance levels estimated using data from this two-phase approach (combining data from the telephone survey with data from follow-up site visits) with performance levels estimated using data from the telephone survey alone (excluding the site visit data), EPA will be able to estimate the bias that would result from relying entirely on telephone survey responses. In addition, we anticipate that the supplemental information obtained through the telephone survey will improve the precision of our performance estimate relative to estimates derived from site visits alone. If the performance estimates from this two-phase sampling approach provide substantial precision gains relative to the performance estimates obtained from site visits alone, the project team will consider using the two-phase approach to estimate performance in 2011.⁵

Exhibit A-2: Two-Phase Sampling Approach for Group B

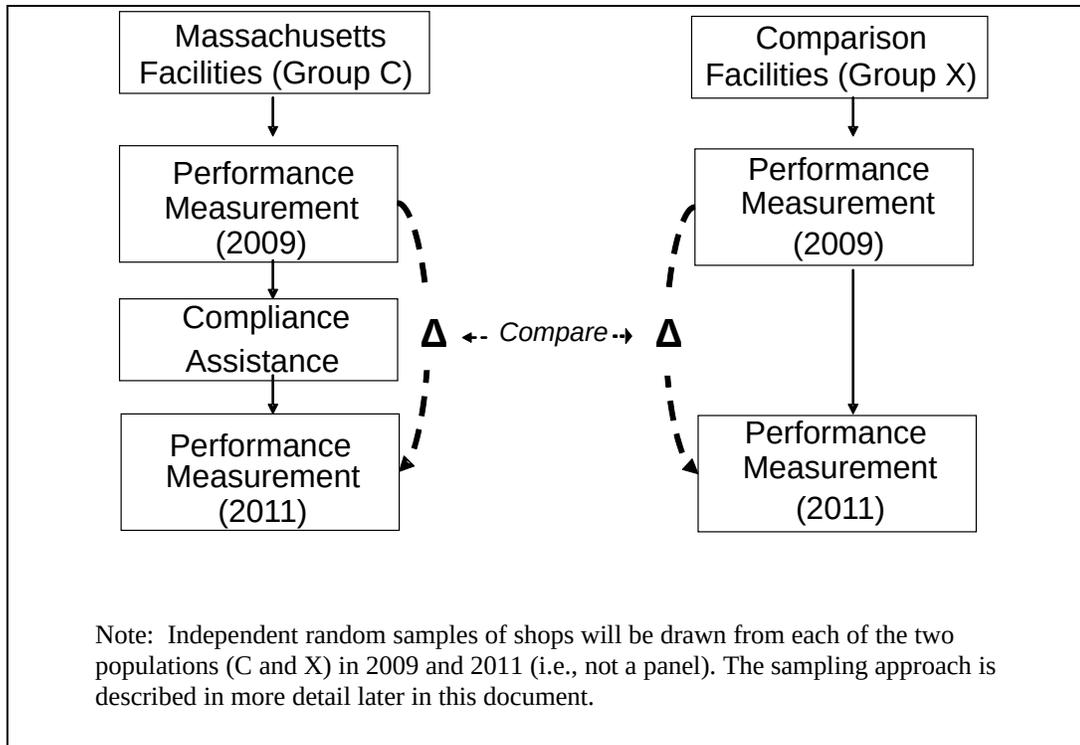


⁴ Note that the two phase sampling approach for Group A is slightly more complex due to stratification, as discussed in the next section under "Sampling and Measurement."

⁵ The possibility of using the two-phase approach for estimating performance levels is expected to influence phone survey design.

EPA will evaluate the long-term impact of a more comprehensive compliance assistance package by means of a quasi-experiment involving all eastern Massachusetts auto body shops in areas with elevated air toxics risks (Group A and Group B combined, or, hereafter, Group C) and a similar population of auto body shops in a comparison location outside of Region 1 (Group X). The shops in Group C will be offered a full suite of compliance assistance activities related to RCRA and surface coating requirements, including outreach, workshops, and shop visits. The shops in Group X will only be offered limited, if any, outreach. For both Group C and Group X, qualified surveyors will visit independent random samples of shops to collect information that EPA will use to estimate shop performance before and after EPA compliance assistance has been provided.⁶ The impact of compliance assistance will be assessed by comparing the change in performance in Group C with the change in performance in Group X. (See Exhibit A-3.) This is referred to in the policy evaluation literature as a “difference-in-differences” approach to assessing policy impacts.

Exhibit A-3: Assessing Long-Term Impact of Compliance Assistance Package



The types of evaluation proposed for the short-term and long-term studies, along with the types of compliance assistance offered in each study, are summarized in Exhibit A-4.

⁶ In other words, we are not planning a panel sample, where we would plan to measure the same facilities at multiple points in time.

Exhibit A-4: Summary of Short- and Long-Term Study Approaches and Treatments

TIME FRAME	EVALUATION APPROACH	COMPLIANCE ASSISTANCE RECEIVED BY TREATMENT GROUP
Short-term	Random-Assignment Experiment	<ul style="list-style-type: none"> • Compliance assistance materials (covering relevant air and RCRA issues, as well as other issues) mailed to all shops • Workshops offered to all shops (attended by subset of shops)
Long-term	Difference-in-Differences Quasi-Experiment	<ul style="list-style-type: none"> • Compliance assistance materials (covering relevant air and RCRA issues, as well as other issues) mailed to all shops • Workshops offered to all shops (attended by subset of shops) • Assistance visits provided to randomly selected shops

The proposed surveys will also enable us to measure spillover effects and the degree of respondents’ exposure to other compliance activities—independent of the ones associated with our programs—so that we can institute appropriate statistical controls.

DESCRIPTION OF THE COLLISION REPAIR CAMPAIGN

The Collision Repair Campaign is a voluntary program between EPA and local communities that works to reduce and eliminate harmful air toxics from collision repair or auto body shops across the nation. The program provides free training, technical assistance, and community outreach to local collision repair shops. The program’s goal is to help shop owners reduce paint, solvent and related hazardous waste disposal costs. It also aims to achieve enhanced compliance with the Surface Coating Rule by reducing pollutants early and to levels beyond those required by the rule. The primary benefit of this program is the reduction of harmful hazardous air pollutant and PM emissions and the resulting benefits to public health.

There are an estimated 50,000 auto body shops in the U.S. Auto body shops have been identified by communities as a primary environmental health concern. These shops are ubiquitous in nature and tend to be clustered in minority, immigrant, and low income neighborhoods. Some of the chemicals used in Auto Body shop operations are highly toxic and may pose a threat to the health of workers, neighbors, and the environment. They include volatile organic compounds, paints containing diphenylmethane diisocyanate (MDI) and toluene diisocyanate (TDI), sanding dusts containing lead and chromium, and acetylene and metal fumes from welding operations. A study of methylene chloride exposures among automotive repair technicians conducted by the Rhode Island Department of Environmental Management found that exposures in a number of samples exceeded Office of Safety and Health Administration limits. There are also issues of improperly stored chemicals and wastes, disposal of illegal materials, and uncontrolled releases of hazardous chemicals into the air. Fumes from spray-painting and improper disposal of used engine oil, among other practices, make auto shops a significant source of air, water and soil pollution. The purpose of the CRC is to motivate a change in shop practices which will, in turn, reduce the release of and exposure to hazardous air pollutants by workers and those living and working nearby. EPA estimates that nationally the new rules will reduce about 2.4 million pounds of toxic

methylene chloride emissions from surface coating operations to the air annually as well as about 13.8 million pounds of other hazardous air pollutants. In addition, EPA estimates annual reductions of particulate matter and volatile organic compounds of about 5.8 million pounds and 41.8 million pounds, respectively (73 FR 1737, at 1755). Given the frequent proximity of shops to business and residences, we expect these reductions to have an important influence on the quality of both local environments and internal shop workspaces over the coming years.

The CRC team will not be using the surveys to conduct statistically valid measurement activities. Rather, to achieve efficiencies in resources, the CRC has partnered with the Pilot project effort to develop a survey tool that can serve multiple purposes for the Agency. The CRC intends to use the surveys to collect anecdotal information on the use of emission reduction best practices at auto body shops to measure the effectiveness of outreach, education, and training resulting from CRC activities. The team will use the information collected through this survey to judge the success and efficacy of the specific activities surveyed (e.g., a specific workshop, or site visit) and will use the information to help improve program implementation. No broad or general statements will be made about the efficacy of the CRC or benefits of the program based on these anecdotal surveys.

The potential respondents to these surveys are owners or operators of collision repair or auto body shops who have completed training provided by the CRC team and their partners or who have requested and received materials developed by the team such as DVDs, brochures, websites, etc. EPA will also provide the survey the Regional office partners and state and local inspectors for them to administer to shops in their jurisdictions. We estimate that there will be no more than 5,000 (1% of the universe of 50,000 shops) respondents spread among the 10 EPA regions over a three-year period. These surveys will be administered as resources allow, as a means of getting feedback on the usefulness of the particular outreach and information provided to that particular shop. The information on the shops' paint use and paint methods that are collected from these surveys will be entered into an emission reduction spreadsheet. This spreadsheet uses calculations developed in the Surface Coating Rule to help estimate baseline emissions and anticipated future emissions. These calculations are based on the best practices that are used and/or planned, and basic parameters such as number of coating jobs per week, amount and type of coatings used.

Providing this information is voluntary. EPA will not gather this information as part of fact finding for regulatory development or enforcement. The customer feedback on the CRC outreach and compliance assistance will help us refine implementation of the surface coating rule so that shops participating in the CRC will be ready to comply with the upcoming Surface Coating Rule compliance deadlines. This use of surveys will only support anecdotal assessments which describe how the outreach has helped shop owners/operators, and the type of current and planned emission reductions estimated based on the information reported. The data collected through these surveys for the CRC will not be used to make generalizations to the overall auto body shop population, CRC program, or emission reductions achieved.

2. Need for and use of the Collection

2 (a) Need/Authority for the Collection:

To help fulfill its broad mandate to protect human health and the environment, EPA provides compliance assistance activities to businesses and other regulated entities (e.g., local governments).

Compliance assistance activities provide the regulated community with the specific information necessary to achieve and maintain regulatory compliance. In particular, for the Pilot, the assistance provided is primarily related to the Surface Coating Rule, a new regulation, with an effective date of 2011. EPA is committed to helping industry understand upcoming requirements so that they can take proactive measures in a timely manner to ensure that they are in compliance when the new regulation becomes effective. In addition, for this Pilot project, assistance may also be provided during shop visits with respect to compliance information on existing regulations (e.g., RCRA requirements). For the CRC, anecdotal information will help improve the Agency's ability to assist the regulated community with compliance under the new Surface Coating Rule.

EPA collects information about how compliance assistance activities help satisfy our responsibilities under the 1993 Government Performance Results Act (GPRA) and Office of Management and Budget's (OMB) Program Assessment Rating Tool (PART). The GPRA requires Federal agencies to develop goals and objectives, measure their performance, and communicate information about their performance to Congress and the public. Under the PART, OMB and Federal agencies assess and improve the agencies' program performance to achieve better results. The PART reinforces the results-oriented performance measurement framework developed under the GPRA.

2 (b) Practical Utility/Users of the Data for the Pilot Project :

EPA will use the information collected to determine if the compliance assistance provided achieves its intended outcomes and satisfactorily furthers the Agency's mission and overall strategic goals. EPA will use the information to identify deficiencies and necessary corrective actions in the training, education, and outreach being performed. In addition to gauging customer satisfaction with the compliance assistance efforts, we intend to measure any resulting changes in knowledge or behavior, and evaluate environmental and human health impacts associated with those changes. In particular, we will explore whether there is a statistically valid correlation between assistance provided and changes in behavior. We will also use the data as a management tool to guide and improve compliance assistance programs.

Following analysis of the data collected through the surveys, the synthesized findings from the surveys will be shared with the appropriate Agency offices, which may use them to: (1) identify methods to improve the effectiveness and efficiency of compliance assistance tools and delivery; (2) develop new compliance assistance tools to address identified problem areas; (3) design similar surveys for similar compliance assistance projects; and (4) design similar methodologies for program evaluation for similar compliance assistance projects. We will also share the data and analysis with OMB to help inform ongoing discussions about ways to develop less rigorous program-wide surveys and data collection methods for compliance assistance activities nationally.

EPA anticipates that the results of compliance assistance assessments will lead to improved compliance assistance services and help us explain how assistance can help support improved environmental management practices. Ultimately, these changes could result in improved compliance with environmental regulations. The ICR does not involve fact-finding for the purposes of regulatory development or enforcement, and the information obtained will not be used to make major policy decisions. Additionally, no sensitive data will be collected under this ICR.

3. Non duplication, Consultations, and Other Collection Criteria

3 (a) Non duplication:

The surveys have been reviewed thoroughly to eliminate, to the extent practicable, duplication in reporting. Respondents will be asked a series of questions. The questions will vary, depending on the survey method (telephone or in-person). Under the Pilot project, some questions will be asked of all sub-groups for purposes of comparability. Some of the information collected by the surveys may be identical to information a shop would report for different purposes, such as in its required initial certification that it is subject to in the Surface Coating Rule. This information must also be collected for this study to determine, prior to the effective date of the regulation, if the respondent will be subject to the regulation and would therefore potentially benefit from EPA's compliance assistance activity. This is explained further in Part B. Similar information is not available elsewhere. Under the CRC, a shop will not be surveyed more than once with these surveys; in addition, CRC users will not target those facilities in the sample populations for the pilot project.

3 (b) Public Notice Required Prior to ICR submission to OMB:

EPA has been working with OMB in the development of this Pilot to ensure adequate design and methodologies for information collection. EPA has followed all requirements under the Paperwork Reduction Act, including providing a 60 day public notice and comment period (74 FR 8534, 2/25/2009) prior to submission to OMB. The 60 day notice period ended April 27, 2009. No comments were received.

3 (c) Consultations:

In developing the design for the Auto body Compliance Assessment Pilot Project, EPA worked closely with Industrial Economics, Corporation (IEc), the prime contractor. IEc provided critical expertise to ensure the technical soundness and usefulness of the measurement design and survey instruments, as well as a framework for collecting and managing the data collected.

EPA also submitted the design for formal peer review by two program evaluation experts and one statistician, seeking and incorporating their input on matters related to the efficacy and reliability of our methodology

In addition to the formal peer review process, the workgroup solicited feedback on the study design and draft survey questions from internal EPA experts and other consultants. The workgroup received comments from four reviewers at EPA, including a statistician, an economist, an expert on performance and accountability, and an expert on environmental data and modeling. The workgroup also received comments from two external consultants, one of whom is an economist and the other an expert in survey design and research.

To ensure that the survey instruments are understandable and collect useful information, EPA also field tested the draft survey instruments by administering telephone surveys to four and on-site surveys to five Massachusetts auto body shops. The auto body shops EPA visited to field test the on-site

survey were drawn from a list of seven shops provided by the Boston Public Health Commission. EPA took care to administer the on-site survey from a cross section of shops, both national chains and individually owned and operated. EPA has the contact information in its files for those it consulted.

3 (d) Effects of Less Frequent Collection:

The auto body compliance assessment pilot project was designed to minimize both the burden on respondents and the measurement bias potentially resulting from repeatedly surveying the same respondents. Our study design contemplates contacting each respondent in the Group X sample (the comparison group for the long term evaluation) just once. Within Group A and Group B, the auto body shops that are contacted for a telephone survey (both respondents and non-respondents) will be placed in a sample from which they may be randomly assigned to the smaller population that will receive an on-site survey. Site visits at respondent facilities will allow us to adjust for any potential self-reporting bias in the telephone survey, while site visits at non-respondent facilities will allow us to adjust for any potential non-response bias. By comparing performance levels estimated using data from this two-phase approach (combining data from the telephone survey with data from follow-up site visits) with performance levels estimated using data from the telephone survey alone (excluding the site visit data), the bias resulting from relying entirely on telephone survey responses can be determined. In addition, we anticipate that the supplemental information obtained through the telephone survey will improve the precision of our performance estimate relative to estimates derived from site visits alone. Following a number of telephone surveys with an on-site survey is necessary to determine the validity of the information self-reported during the telephone surveys. EPA needs to determine the validity of telephone surveys both to assess the non-response bias associated with telephone non-respondents, and to determine if responses from telephone surveys can be used to increase the precision of this study. And, because Group C, the sample population to receive an on-site survey as part the long-term study, will be randomly assigned from Groups A and B, the populations from which random samples were drawn for the sort-term evaluation, a small percentage of the Group C shops will have previously responded to a telephone survey, an on-site survey with accompanying on-site compliance assistance, or both. We will stratify the results on these factors to assess the comparative impact of the additional contacts. Less frequent collection would not allow EPA to address bias and validity concerns raises by the Office of Management and Budget, and would not collect sufficient data to assess the influence of EPA's compliance assistance activities on respondent behavior.

3 (e) General Guidelines:

This ICR complies with OMB's general guidelines for the collection of information.

3 (f) Confidentiality:

No confidential data will be collected

3 (g) Sensitive Questions:

No sensitive questions will be asked; respondents may always choose to not answer a particular question.

4. The Respondents and the Information Requested

4 (a) Respondents/ SIC Codes

EPA plans to survey auto body shops (SIC Code 7532). Auto body facilities are subject to the Surface Coating Rule if they are paid to complete at least two surface coatings each year on vehicles or pieces of mobile equipment.

For the auto body compliance assessment pilot project, the survey effort will cover facilities located in areas of eastern Massachusetts and Group X that have elevated cancer and/or non-cancer health risks from air pollutants (Source: 1999 National Air Toxics Assessment data).. The Agency is currently considering two potential locations for Group X: Oklahoma and southeastern Virginia. The characteristics of these locations are being evaluated, and the comparison location will be selected prior to beginning the study. The evaluation criteria used in selecting Group X include:

- number of shops located in areas of elevated-risk;
- state regulations related to RCRA and air emissions; and
- expected compliance assistance from EPA, state, or other entities.

For the Collision Repair Campaign, the respondents may be any auto body shop shops (excluding those in the sample populations in Massachusetts, and Group X) that have completed training provided by the CRC team and its partners, or that have requested and received materials developed by the team such as DVDs, brochures, websites, etc. EPA will also provide the survey to the Regional office partners and state and local inspectors for them to administer to shops in their jurisdictions. We estimate that there will be no more than 5000 (1% of the universe of 50,000 shops) respondents spread among the 10 EPA regions over a three-year period.

4 (b) Information Requested:

The questions contained in the surveys are designed to obtain information on (1) environmental performance related to current hazardous waste management and training requirements under RCRA, (2) environmental performance related to air emissions control requirements associated with the recently promulgated Surface Coating Rule, (3) environmental compliance assistance received by government agencies or other entities, and (4) perceptions regarding the factors that influence shop behaviors related to environmental performance.

There are two different questionnaires, one for the on-site survey and one for the telephone survey. The on-site survey is designed to be consistent with the general flow of a shop walk-through, with the interviewer obtaining data on environmental performance through his or her own observations and through targeted questions of shop personnel. The telephone survey focuses on a subset of the data

items that are included in the on-site survey, as the survey needs to be relatively brief to discourage hang-ups. The telephone survey focuses mainly on environmental performance measures that can be later verified independently through interviewer observations on site.

The survey instruments are in Appendices B and C. The survey questions focus on the key areas of: employee training, air pollution, hazardous wastes generation and determination, emergency procedures, and compliance assurance. EPA is collecting information in these areas because they cover key regulatory requirements applicable to auto body shops, are important indicators of the shops' overall compliance status, and because non-compliance in these areas potentially could cause significant environmental impact.

In addition to using these surveys for the Auto Body Compliance Assessment Pilot Project, EPA wants to use them to assess outcomes associated with OAQPS' Collision Repair Campaign or outreach on new auto body requirements and best practices conducted by EPA Regional Offices or EPA grantees (e.g., CARE Grant recipients, State P2 recipients...etc.). The information on the shops' paint use and paint methods that are collected from these surveys will be entered into an emission reduction spreadsheet. This spreadsheet uses calculations developed in the Surface Coating Rule to help estimate baseline emissions and anticipated future emissions. These calculations are based on the best practices that are used and/or planned, and basic parameters such as number of coating jobs per week, amount and type of coatings used.

Providing this information is voluntary. EPA will not gather this information as part of fact finding for regulatory development or enforcement. The customer feedback on the CRC outreach and compliance assistance will help us refine implementation of the surface coating rule so that shops participating in the CRC will be ready to comply with the upcoming Surface Coating Rule compliance deadlines. This use of surveys will only support anecdotal assessments which describe how the outreach has helped shop owners/operators, and the type of current and planned emission reductions estimated based on the information reported. The data collected through these surveys for the CRC will not be used to make generalizations to the overall auto body shop population, CRC program, or emission reductions achieved

5. The Information Collected—Agency Activities, Collection Methodology, and Information Management

EPA plans to conduct two sets of telephone surveys throughout the duration of the S-V Pilot project. The first set will be conducted in the summer of 2009 to gather information on environmental performance. On-site visits will soon follow the telephone survey to validate information collected from the telephone. EPA personnel will administer surveys and also deliver compliance assistance while they are on-site. All information collected from both the telephone survey and on-site visits will be properly coded and entered into a data management system that will reside in EPA Region I office.

The second set of telephone surveys will be conducted in the summer of 2010 to assess the effectiveness of the on-site treatment given a year before and to determine the level of compliance. Again, data collected from this telephone survey will be properly coded and entered into the same data management system.

Soon after the 2011 effective date of the Surface Coating Rule, EPA will conduct a round of on-site surveys to assess the final compliance status of these shops. The EPA staff/contractors are not expected to provide assistance during this last set of on-site visits. If EPA determines that the two-phase sampling approach substantially increases the precision of the environmental performance estimates substantially without adding undo complexity to the study, the Agency may add another round telephone surveys in 2011. While we are not certain that we will conduct telephone surveys in 2011, our burden estimate includes hours for this effort

6. Estimating the Burden and Cost of the Collection

This discussion presents the estimated burden hours for information to be collected as part of the Auto body Compliance Assessment Pilot Project. EPA uses high numbers of surveys for the burden estimate to ensure this ICR does not underestimate burden hours. See Table B.1 in Part B for the actual planned sample sizes for this pilot. This discussion also presents the estimated burden hours for information to be collected as part of efforts to assess outcomes associated with the Office of Air Quality Planning and Standard's Collision Repair Campaign or outreach on new auto body requirements and best practices undertaken by EPA Regional Offices of EPA Grantees.

Estimated burden hours for information to be collected through Auto Body Compliance Assessment Pilot Project

TYPE OF INFORMATION COLLECTION INSTRUMENT	ESTIMATED # OF RESPONDENTS	ESTIMATED MINUTES/HRS PER RESPONDENT	TOTAL ESTIMATED BURDEN PER COLLECTION EFFORT
1st Phone Survey for Gp C (FY09)	400	10min/0.17hr	4000min/67hr
2nd Phone Survey for Gp C (FY10)	300	10min/0.17hr	3000min/50hr
3rd Phone Survey for Gp C (FY11)	300	10min/0.17hr	3000min/50hr
Phone Survey for Comparison Group X (FY11)	300	10min/0.17hr	3000min/50hr
TOTAL BURDEN HRS FOR PHONE SURVEYING	1300	10min/0.17hr	13,000min/217hr
1st round site visits for Gp C (FY 09)	180	75min/1.25hr	13,500min/225hr
2nd round site visits for Gp C (FY 10)	60	75min/1.25hr	4500min/75hr
3rd round site visits for Gp C (FY 11)	100	75min/1.25hr	7500min/125hr
1st round site visits for Gp X (FY09)	100	75min/1.25hr	7500min/125hr
2nd round site visits for Gp X (FY11)	100	75min/1.25hr	7500min/125hr
TOTAL BURDEN HRS FOR SITE VISITS	540	75min/1.25hr	40,500min/675hr

Respondents' Burden

Number of respondents: 1840
 Minutes per response: 10 minutes for phone, 75 minutes for on-site visits
 Cost per hour: \$94.33 (\$44.92 + 110%)*
 Cost per response: \$94.33 x 10/60 = \$15.72 for phone
 \$94.33 x 75/60 = \$118 for on-site visits
 Total burden hours: 1300 x 10/60 = 217 hours for phone survey
 540 x 75/60 = 675 hours for on-site visits
 Total burden dollar cost: 217hours x \$94.33 = \$20,470 for phone survey
 675 hours x \$94.33 = \$63,673 for some on-site visits
 Total cost: \$84,143

*This ICR uses the following labor rates:

Managerial	\$111.43 (\$53.04 + 110%)
Technical	\$94.33 (\$44.92 + 110%)
Clerical	\$45.28 (\$21.56 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2008, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

Agency Burden

EPA Staff Time: 2766 hours (217hr + 2x540 + 675 + 794hr)
 Cost per hour: \$59.63 (GS-13, Step 5, \$37.27 + 60%)**
 Total burden hours: 2766 hours x \$59.63 = \$164,937

This cost is based on the average hourly labor rate as follows:

Managerial \$59.63 (GS-13, Step 5, \$37.27 + 60%)
 Technical \$44.24 (GS-12, Step 1, \$27.65 + 60%)
 Clerical \$23.94 (GS-6, Step 3, \$14.96 + 60%)

**These rates are from the Office of Personnel Management (OPM) "2008 General Schedule", which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages made available to government employees. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost, NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart Mmmm) (Renewal).

Estimated burden hours for information to be collected through the Collision Repair Campaign

TYPE OF INFORMATION COLLECTION INSTRUMENT	ESTIMATED # OF RESPONDENTS	ESTIMATED MINUTES/HRS PER RESPONDENT	TOTAL ESTIMATED BURDEN PER COLLECTION EFFORT
1st Phone Survey (FY09)	2000	10min/0.17hrs	20,000min/333.3hrs
2nd Phone Survey (FY10)	1500	10min/0.17hr	15,000min/250hr
3rd Phone Survey (FY11)	1500	10min/0.17hr	15,000min/250hr
TOTAL BURDEN HRS FOR PHONE SURVEYING	5,000	10min/0.17hr	50,000min/833.3hr
1st round Site Visits (FY10)	1250	75min/1.25hr	93,750min/1562.5hr
2nd Round Site Visits (FY11)	1250	75min/1.25hr	93,750min/1562.5hr
TOTAL BURDEN HRS FOR SITE VISITS	2,500	75min/1.25hr	187,500min/3,125hrs

Respondents' Burden

Number of respondents: 7500
 Minutes per response: 10 minutes for phone, 75 minutes for on-site visits
 Cost per hour: \$94.33 (\$44.92 + 110%)*
 Cost per response: \$94.33 x 10/60 = \$15.72 for phone
 \$94.33 x 75/60 = \$118 for other on-site visits
 Total burden hours: 5,000 x 10/60 = 833.3 hours for phone survey
 2500 x 75/60 = 3125 hours for other on-site visits

Bottom Line Burden Hours and Costs

The annualized cost and burden for the pilot project is shown in the table below:

	Respondents	Burden Hours	Cost
Auto Body Compliance Assessment	1,840 (1,300 phone + 540 site visits)	892 (217 phone + 675 site visits)	\$84,143 (\$20,470 phone + \$63,673 site visits)
Collision Repair Campaign	7,500 (5,000 phone + 2,500 site visits)	3,958 (833 phone + 3,125 site visits)	\$373,386 (\$78,605 phone + \$294,781 site visits)
TOTAL	9,340	4,850	\$457,529
Annual (Total/3 years)	3,113	1,617	\$152,510

Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to be average a response time of 10 minutes for each phone survey, and 75 minutes for each on-site visit. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements which have subsequently changed; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2009-0124, which is available for online viewing at www.regulations.gov, or in person viewing at the OECA Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the OECA Docket is (202) 566-1752. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0124 and OMB Control Number 2020-NEW in any correspondence.

Appendix A:

Approximate Time Line for Pilot Project Activities

	Sept.-Oct. 2009	Oct.- Nov. 2009	Oct. - Dec. 2009	Dec 2009-Jan 2010
Group A	Compliance Assistance (CA): <ul style="list-style-type: none">• Mailings• Workshops	Phone Surveys	On-site surveys Followed by onsite Compliance assistance	
<hr/>				
Group B		Phone Surveys	On-site surveys Followed by onsite Compliance assistance	Workshops
<hr/>				
Group X			On-site surveys	

Overview of Auto Body Compliance Assessment Pilot Project, Cont'd

	Jan. – Dec. 2010	July – Dec. 2011
Group C (combined Groups A + B)	On-site Compliance Assistance	On-site surveys
	Phone Surveys	

Group X	On-site surveys
----------------	-----------------

Appendix B

SV Pilot Phone Survey Instructions

Introduction:

Hi, my name is [interviewer name]. I'm calling on behalf of the U.S. Environmental Protection Agency. We are conducting a brief survey related to environmental practices at autobody shops. Are you the person I should speak to about environmental issues in your shop?

(If no, ask to speak with appropriate person and repeat above introduction. If target respondent not available, schedule a callback date and time. The ideal target respondent (in survey research this is called the "most knowledgeable person" -- MKP). is the person from the shop who keeps up with environmental requirements, is familiar with shop set up and operations, and perhaps receives information through training or attending workshops or manages the operations of the shop.)

The survey will help EPA improve the assistance it provides to shops in complying with environmental regulations.

Great. The survey should take only about 10 minutes. The purpose of this phone call is to ask about the shop conditions to help EPA develop appropriate future compliance assistance measures. The information gathered is not intended to be used for inspection or enforcement purposes. However, I am required to report conditions that appear to pose significant threat to human health or the environment or any significant violations.

PROPOSED TELEPHONE SURVEY INSTRUMENT

KEY:

Boldface Font – Spoken question

Normal Font – Response options

Italics – Instruction for questionnaire administrator (not spoken)

Date of Survey: _____

Agency/Regional Office: _____

Interviewer: _____

Tel. _____

Facility

Name: _____

Facility

Address: _____

Name and Title of Facility Contact Person:

Telephone number of Facility Contact Person:

SECTION A: INTRODUCTION

A1. Which of the following categories best describes your role at this shop? (read categories):

___ **Owner**

___ **Manager**

___ **Technician who applies spray coatings**

___ **Another role** (specify) _____

A2. a. Do the operations at your shop include the application of surface coatings to vehicles or parts?

___ Yes

___ No → *End survey*

b. When did initial construction of spray painting or paint stripping equipment begin?

_____ (Month/Year) ___ Don't recall

A3. Is this shop part of a corporate chain?

- Yes (specify which one) _____
 No

SECTION B: AIR POLLUTANTS

B1. What type of spray guns do you use to apply coatings in your shop?

- HVLP (High Volume Low Pressure)
 Electrostatic
 Airless spray gun
 Air assisted airless
 Don't know
 Other (specify) _____

Note for surveyor: If flow is 15-26 cubic feet per minute and PSI at orifice is less than 10 lb per square inch, then likely to be an HVLP spray gun.

Now I have a few questions about where in your shop coatings are applied to vehicles:

B2. a. Does your shop have a spray booth?

- Yes
 No → Skip to B4

b. Are ALL spray coatings applied in the spray booth?

- Yes
 No
 Don't know

c. When did your shop first begin using this spray booth to apply coatings? (read responses)

- Less than 2 years
 2-5 years ago
 More than 5 years ago
 Don't know

d. Is the spray booth enclosed with a full roof and four complete walls or side curtains?

- Yes, spray booth is enclosed
 No, spray booth is NOT enclosed
 Don't know

B3. a. Is the spray booth ventilated with an exhaust fan?

- Yes, spray booth is ventilated
- No, spray booth is NOT ventilated → *Skip to B4*
- Don't know → *Skip to B4*

b. When was this booth exhaust system first used at your shop? (read responses)

- Less than 2 years ago**
- 2-5 years ago**
- More than 5 years ago**
- Don't know**

c. What is the capture efficiency of your booth exhaust system?

If respondent is unsure, note that this information would typically be found on the filter package or provided by the distributor.

- % Capture efficiency (*list numerical value*)
- Don't know

d. Is there a particle filter on the spray booth exhaust?

- Yes, the station has a particle filter
- No, the station does not have a particle filter
- Not sure

B4. a. . Do you have a separate paint mixing room?

- Yes
- No → *Skip to B5*

b. When did your shop first begin using this mixing room? (read responses)

- Less than 2 years**
- 2-5 years ago**
- More than 5 years ago**
- Don't know**

c. Is the mixing room enclosed with a full roof and at least three complete walls or side curtains?

- Yes, mixing room is enclosed
- No, mixing room is NOT enclosed
- Don't know

d. Is the mixing room ventilated with an exhaust fan?

- Yes, mixing room is ventilated

- No, mixing room is NOT ventilated
- Don't know

B5. a. Do you have a prep station where coatings are applied on vehicle components?

- Yes
- No → Skip to B6

b. When did your shop first begin using this prep station? (read responses)

- Less than 2 years
- 2-5 years ago
- More than 5 years ago
- Don't know

c. Is the prep station enclosed with a full roof and at least three complete walls or side curtains?

- Yes, prep station is enclosed
- No, prep station is NOT enclosed
- Don't know

d. Is the prep station ventilated with an exhaust fan?

- Yes, prep station is ventilated
- No, prep station is NOT ventilated
- Don't know

B6. Do you use waterborne paints?

- Yes
- No → Skip to B8
- Don't know → Skip to B8

B7. What do you use waterborne paints for? (read responses)

- Basecoat
- Primer
- Another use (Specify) _____

B8. On average, about how many gallons of each of the following coatings are applied (not purchased) in your shop each week? (read responses)

- | | | |
|------------------------|---------------|------------------|
| Basecoat: | _____ gallons | _____ don't know |
| Primer: | _____ gallons | _____ don't know |
| Topcoat: | _____ gallons | _____ don't know |
| Total Estimate: | _____ gallons | _____ don't know |

B9. Who is your supplier of paint coating products?

Supplier: _____

Would you please provide contact information for that supplier? We are asking because we would like to partner with the suppliers to provide compliance assistance in the future.

Contact Information:

B10. a. Have ALL spray technicians been trained regarding spray equipment?

- Yes (all)
- Yes (some)
- No → *Skip to B11*
- Not sure → *Skip to B11*

b. Has the training addressed and/or included the following regarding spray equipment? (read responses; check all that apply)

- Selection
- Set-up
- Use
- Maintenance
- Hands on with equipment
- Classroom

B11. Have you heard of EPA regulations related to spray painting operations and paint stripping?

- Yes
- No → *Skip to C1*

B12. When did you first hear of these new regulations?

- Year
- Month
- Don't know

B12. What sources of information helped you learn about the regulations so far? (Read list of sources)

Sources: Circle all that apply	For each circled source, ask: Who provided this information? Then check off provider from list below for that source. Do not read the list of providers.							
	EPA	State	Supplier/ vendor	Other auto body shops	Trade Ass'n	Local Gov't	OSHA	Don't Know
Shop Visit								
DVD								
CD								
Post Card								
Fact Sheet								
Website								
Workshop								
Another source								

If another source, specify:

SECTION C: RCRA GENERATOR AND WASTE DETERMINATION

Now I have a few questions about how you manage your hazardous waste.

C1. About how much hazardous waste does your shop generate each month? (read options)

- 0 - 26 gal/mo (VSQG or equivalent)
- 27-270 gal/mo (SQG)
- >270 gal/mo (LQG)
- Don't know or your waste hauler handles that for you

C2. Are all hazardous waste containers properly labeled?

- Yes
- No
- Don't know

If interviewee asks, explain that all hazardous waste containers should be labeled with the words "hazardous waste" and clearly marked with the date on which accumulation began.

C3. Does your shop send all hazardous waste to a permitted or state authorized hazardous waste treatment, storage, or disposal facility, or a state authorized facility? (Example: Clean Harbors in Braintree)

- Yes
- No
- Don't know
- Recycled

C4. Are used absorbent paint applicators such as shop rags and towels stored in closed containers?

- Yes, containers are closed
- No, containers are not closed
- Don't know
- Don't use

C5. Do you treat the following as hazardous wastes: (read list of waste streams)

Waste streams:	<i>For each waste stream, check off relevant response:</i>			
	Yes	No	Don't Know	Not Applicable (i.e., this waste stream isn't generated at all)
Solvents				
Paints				
Sand blast debris				
Use rags				
Spray booth filters				
Antifreeze				
Waste oil				
Another hazardous waste stream				

If other, specify: _____

C6. Have your employees taken a training program that covers proper hazardous waste management procedures?

- Yes
- No
- Don't know

SECTION D: COMPLIANCE ASSURANCE

D1. How do you obtain information about how to comply with federal and state environmental regulations? (do not read responses; check all that apply)

- Coating manufacturers or suppliers
- Corporate environmental division
- Educational institutions (vocational technical school, community college, specialized training center, etc.)
- Environmental consultant
- Other autobody shops
- Local government (town, city, or county)
- OSHA
- State environmental agencies
- Suppliers
- Trade association
- U.S. EPA
- Other (Specify) _____
- Don't know

D2. Has your shop been inspected or visited by a government environmental, health and or safety official within the last six months?

- Yes
- No → *End survey*
- Don't know → *End survey*

D3. What type of government official inspected or visited your shop? (do not read responses, check all that apply)

- EPA
- State
- Local government (environmental, health or fire department)
- OSHA
- Other (specify) _____
- Don't know/Can't recall

Thank you for your time.

Appendix C

Proposed Survey Instrument for On-Site Inspections

KEY:

Boldface Font – Spoken question

Normal Font – Site visit record/contacts and response options

Italics – Instruction for compliance assistance provider (not spoken)

Date of Visit: _____

Agency/Regional Office: _____

Assistance Provider: _____

Tel. _____

Facility

Name: _____

Facility

Address: _____

Name and Title of Facility Contact Person:

Telephone number of Facility Contact Person:

Introduction

Hi, my name is [interviewer name]. I am here on behalf of the U.S. Environmental Protection Agency. We are conducting a survey related to environmental practices at autobody shops. The survey will help EPA improve the assistance it provides to shops in complying with environmental regulations. Are you the person I should speak to about environmental issues in your shop?

(If no, ask to speak with appropriate person and repeat above introduction. The ideal respondent (in survey research this is called the "most knowledgeable person" -- MKP) is the person from the shop who keeps up with environmental requirements, is familiar with shop set up and operations, and perhaps receives information through training or attending workshops or manages the operations of the shop.)

Great. It will take us about 1 hr to walk through the shop and complete the survey, and your responses will remain anonymous. Is there an office, or a place where we can sit to go over some of the basic questions first?

Based on our observations and experience testing the survey out in shops, it works best to go through all interview questions up front in a quiet office area and then ask to be shown through the shop for observations

The purpose of this site visit is to ask about the shop conditions to help EPA develop appropriate future compliance assistance measures. The information gathered is not intended to be used for inspection or enforcement purposes. However, I am required to report conditions that appear to pose significant threat to human health or the environment or any significant violations.

SECTION A: INTRODUCTION

A1. Which of the following categories best describes your role at this shop? (read categories):

- Owner**
- Manager**
- Technician who applies spray coatings**
- Another role (specify)_____**

A2. a. Do the operations at your shop include the application of surface coatings to vehicles or parts?

- Yes
- No → *End survey*

b. When did initial construction of spray painting or paint stripping equipment begin?
_____ (Month/Year) _____ Don't recall

A3. Is this shop part of a corporate chain?

- Yes (specify which one)_____
- No

SECTION B: TRAINING

B1. a. Have your employees taken a training program that covers proper hazardous waste management procedures?

- Yes
- No → *Skip to B 2*
- Don't know → *Skip to B 2*

b. Is the documentation related to the hazardous waste management training program present and available for review?

- Yes
- No
- Don't know

CA provider may examine documentation to determine whether or not shop has program. The CA provider will not evaluate the quality of the training program.

- Shop has training program
- Shop does not have training program
- Not sure

B2. a. Have ALL spray technicians been trained regarding spray equipment?

- Yes (all)
- Yes (some)
- No → Skip to C 1
- Not sure → Skip to C 1

b. Has the training addressed and/or included the following regarding spray equipment? (read responses; check all that apply)

- Selection**
- Set-up**
- Use**
- Maintenance**
- Hands on with equipment**
- Classroom**

c. Are the training records present and available for review?

CA provider may examine documentation (certificates, dates, places) to determine whether or not the spray technicians have been properly trained (meaning they have been trained in all 6 areas listed in question B2(b) above).

- All technicians have been properly trained.
- Some (but not all) technicians have been properly trained
- None of the technicians has been properly trained
- Records not available

SECTION C: AIR POLLUTANTS

When we walk through the shop, it would be helpful if you could show me your spray guns.

C1. a. Does your shop have a spray booth?

- Yes
- No → *Skip to C2*

b. Are ALL spray coatings applied in the spray booth?

- Yes
- No
- Don't know

c. When did your shop first begin using this spray booth to apply coatings? (read responses)

- Less than 2 years**
- 2-5 years ago**
- More than 5 years ago**
- Don't know**

C2. a. Is the spray booth ventilated with an exhaust fan?

- Yes, spray booth is ventilated
- No, spray booth is NOT ventilated → *Skip to C3*
- Don't know → *Skip to C3*

b. Do you know the capture efficiency rating of your booth exhaust system?

- % Capture efficiency (*list numerical value*)
- Don't know

c. Is the documentation related to the capture efficiency of your booth exhaust system present and available for review?

If respondent is unsure, note that this information would typically be found on the filter package or provided by the distributor. CA provider may review documentation to determine the capture efficiency:

- % Capture efficiency (*list numerical value*)
- Cannot find it

d. When was this booth exhaust system first used at your shop? (read responses)

- Less than 2 years ago**
- 2-5 years ago**
- More than 5 years ago**
- Don't know**

When we walk through the shop, it would be helpful if you could show me your spray booth and exhaust system.

C3. a. Do you have a separate paint mixing room?

- Yes

___ No → *Skip to C4*

b. When did your shop first begin using this mixing room? (read responses)

- ___ Less than 2 years
- ___ 2-5 years ago
- ___ More than 5 years ago
- ___ Don't know

C4. a. Do you have a prep station where coatings are applied on vehicle components?

- ___ Yes
- ___ No → *Skip to C5*

b. When did your shop first begin using this prep station? (read responses)

- ___ Less than 2 years
- ___ 2-5 years ago
- ___ More than 5 years ago
- ___ Don't know

When we walk through the shop, it would be helpful if you could show me the mixing room and/or the prep station.

C5. a. How do technicians at your shop typically clean the spray guns?

- ___ Use a fully enclosed spray gun washer
- ___ Use a fully enclosed spray gun washer and occasionally disassemble and clean by hands
- ___ Flush with solvent (but don't spray)
- ___ Spray coatings and/or solvent through the gun
- ___ Clean disassembled gun by hand or through mechanical methods
- ___ Other (specify) _____

b. When was this spray gun cleaning approach first used at your shop?

- ___ Less than 2 years ago
- ___ 2-5 years ago
- ___ More than 5 years ago
- ___ Don't know

When we walk through the shop, it would be helpful if you could show me the gun cleaning area and operations.

C6. Do you use waterborne paints?

- ___ Yes
- ___ No → *Skip C8*

___ Don't know → Skip C8

C7. Do you use waterborne paints for your: (read responses)

___ Basecoat

___ Primer

___ Other (specify) _____

C8. On average, about how many gallons of each of the following coatings are applied in your shop each week?

Basecoat: _____ gallons _____ don't know

Primer: _____ gallons _____ don't know

Topcoat: _____ gallons _____ don't know

Total Estimate: _____ gallons _____ don't know

C9. Who is your primary supplier of paint coating products?

Supplier: _____

Would you please provide contact information for that supplier? We are asking because we would like to partner with the suppliers to provide compliance assistance in the future.

Contact Information:

C10. Does your shop have Material Safety Data Sheets (MSDS) and coating formulation data supplied by the manufacturer for the solvents and coatings that you use? Is this documentation present and available for review?

CA provider observes documentation and records whether or not it is sufficient. If no physical documentation is available, CA provider will confirm if shop uses a color matching computer technology on-site that has formulation data in it, and if so, ask to see data.

___ Yes, documentation available for all solvents and coatings

___ Documentation available for some solvents and coatings, but not all

___ Documentation not available for any solvents or coatings

___ Don't know

C11. Do the coatings used by your shop contain any of the following hazardous air pollutants: chromium, lead, cadmium, nickel, or manganese (includes compounds of these metals)?

___ Yes

___ No

___ Don't know

C12. a. Do you use chemical products for paint stripping tasks?

- Yes
- No → Skip C13
- Don't Know

b. What chemical products do you use for paint stripping?

List Products:

c. Have you checked these products for the presence of Methylene Chloride?

- Yes
- No
- Don't know

[e.g. StripRDry, Booth Floor Stripper both made by CMA Philadelphia, both contain MeCl]

When we walk through the shop, it would be helpful if you could show me the products.

C13. May I please see records related to your shop's methylene chloride usage?

CA provider examines documentation and records annual usage:

- Gallons per year (as supported by documentation)
- Don't know; no documentation

C14. Does your shop have a minimization plan for use of MeCl? Could I take a look at it?

CA provider examines documentation and determines whether or not a plan exists:

- Yes, shop has minimization plan
- No, shop does not have minimization plan

C15. Have you heard of EPA regulations related to spray painting operations or paint stripping?

- Yes
- No → Skip to D1

C16. When did you first hear of these regulations?

- Year
- Month
- Don't know

C17. What sources of information helped you learn about the regulations so far? (Read list of sources)

Sources: Circle all that apply	For each circled source, ask: Who provided this information? Then check off provider from list below for that source. Do not read the list of providers.							
	EPA	State	Supplier/ vendor	Other auto body shops	Trade Ass'n	Local Gov't	OSHA	Don't Know
Shop Visit								
DVD								
CD								
Post Card								
Fact Sheet								
Website								
Workshop								
Another source								

If another source, specify:

SECTION D: RCRA GENERATOR AND WASTE DETERMINATION

D1. About how much hazardous waste does your shop generate each month? (read options)

- 0 - 26 gal/mo (VSQG or equivalent)
- 27-270 gal/mo (SQG)
- >270 gal/mo (LQG)
- Don't know or your waste hauler handles that for you

When we walk through the shop, it would be helpful if you could show me the hazardous waste storage area.

D2. Is the documentation related to shipping these wastes off site present and available for review?

CA provider should review documentation if the answer to D1 above is "don't know."

- Yes
- No
- Don't know

When we walk through the shop, it would be helpful if you could show me where used rags and towels are stored.

D3. Do you treat the following as hazardous wastes: (read list of waste streams)

Waste streams:	For each waste stream, check off relevant response:			
	Yes	No	Don't Know	Not Applicable (i.e., this waste stream isn't generated at all)
Solvents				
Paints				
Sand blast debris				
Use rags				
Spray booth filters				
Antifreeze				
Waste oil				
Another hazardous waste stream				

If other, specify: _____

Note: Spent/used booth filters are typically being treated as solid waste. Advise shops that the only definitive way to know if those are non-hazardous is by testing (TCLP) to determine whether they are characteristic of hazardous waste.

SECTION E: EMERGENCY PROCEDURES (EPCRA)

E1. Have you implemented emergency procedures in your shop?

- ___ Yes
- ___ No
- ___ Don't Know

E2. Is the documentation related to your emergency procedures present and available for review?

CA provider reviews documentation and determines whether or not emergency procedures are in place:

- ___ Shop has emergency procedures in place
- ___ Shop does not have emergency procedures in place
- ___ Don't know

Note to CA provider: Emergency procedures can include: The shop posting the current name and telephone number of the emergency coordinator; posting the location of fire extinguishers and spill control material, and if present, fire alarm; posting the telephone number of the fire department, unless the shop has a direct alarm.

SECTION F: COMPLIANCE ASSURANCE

F1. How do you obtain information on how to comply with federal and state environmental regulations? *(do not read responses; check all that apply)*

- Coating manufacturers or suppliers
- Corporate environmental division
- Educational institutions (vocational technical school, community college, specialized training center, etc.)
- Environmental consultant
- Other auto body shops
- Local government (town, city, or county)
- OSHA
- State environmental agencies
- Suppliers
- Trade association
- U.S. EPA
- Other (Specify) _____
- Don't know

F2. Has your shop been inspected or visited by a government environmental or health and safety official within the last six months?

- Yes
- No → *Skip to F 4*
- Don't know → *Skip to F 4*

F3. What type of government official inspected or visited your shop? *(check all that apply)*

- EPA
- State
- Local government (environmental, health or fire department)
- OSHA
- Other (specify) _____
- Don't know/Cannot recall

F4. a. Have you made any changes in the last year in your shop operations (e.g., the type of equipment you use, techniques you use, or training you provide)?

- Yes
- No → *Skip to F 5*
- Don't know → *Skip to F 5*

b. What changed?

Comment: _____

c. Why did this change happen?

Comment: _____

F5. Is there any other information about your shop's operations that you'd like to share before we walk through the shop together? Is there anything that you would like EPA to know or to do related to assistance or inspections or other activities that impact your operations?

Comment: _____

SECTION G: Walk Through *(The order of these questions may have to be rearranged based on the set up of the shop.)*

G1. May I see the spray guns you use? *(Check all that apply)*

- _____ HVLP (High Volume Low Pressure)
- _____ Electrostatic
- _____ Airless spray gun
- _____ Air assisted airless
- _____ Other (specify) _____
- _____ Don't know

Note for CA provider: If flow is 15-26 cubic feet per minute and PSI at orifice is less than 10 lb per square inch, then likely to be an HVLP spray gun. Other equivalent high transfer efficiency technology examples include: electrostatic application, airless spray gun, and air-assisted airless guns.

G2. *Verify the Manufacturer of the Spray guns:*

- _____ Manufacturer
- _____ Manufacturer
- _____ Manufacturer
- ___ Don't know

G3. **May I see the gun cleaning area, operations?**

CA provider observes cleaning procedures and categorizes cleaning technique:

- ___ Use a fully enclosed spray gun washer
- ___ Use a fully enclosed spray gun washer and occasionally disassemble and clean by hands
- ___ Flush with solvent (but don't spray)
- ___ Spray coatings and/or solvent through the gun
- ___ Clean disassembled gun by hand or through mechanical methods
- ___ Other (specify) _____

G4. **May I see your spray booth?**

___ *If no spray booth present, check here and skip to G7.*

CA provider performs visual inspection to confirm that spray booths, where coatings are applied to full vehicles, are fully enclosed and ventilated. Check all that apply:

- ___ Spray booth is fully enclosed with a full roof, four complete walls or side curtains
- ___ Spray booth is not fully enclosed
- ___ Spray booth is ventilated with an exhaust fan
- ___ Spray booth is not ventilated with an exhaust fan
- ___ There is evidence that at least some spray coating occurs outside of a spray booth

G5. **May I see the particle filter on the spray booth exhaust?**

CA provider performs visual inspection of pipe and filter and determines whether or not there is a particle filter on the exhaust:

- ___ Yes, the station has a particle filter
- ___ No, the station does not have a particle filter
- ___ Not sure

Note to CA provider: you may see a wall fan and small box with filter.

- G6. *Is the particulate filter in good condition? Look for rips or gaps in the particulate filters; check to see if the filters appear to be clogged with paint residue or dust.*

CA provider records condition of particulate filters:

- Good condition
- Fair condition
- Poor condition
- Don't know

If the filters are not in good condition, CA Provider should ask the shop to revisit manufacturer's recommendation.

G7. May I see your mixing room?

___If no mixing room present, check here and skip to G8.

CA provider performs visual inspection to confirm that mixing room is enclosed and ventilated. Check all that apply:

- Mixing room is enclosed with a full roof and at least three complete walls or side curtains
- Mixing room is not enclosed as described above
- Can't tell if mixing room is enclosed

- Mixing room is ventilated with an exhaust fan
- Mixing room is not ventilated with an exhaust fan
- Can't tell if mixing room is ventilated

G8. May I see your prep station?

___If no prep station present, check here and skip to G9.

CA provider performs visual inspection to confirm that prep station is enclosed and ventilated. Check all that apply:

- Prep station is enclosed with a full roof and at least three complete walls or side curtains
- Prep station is not enclosed
- Can't tell if prep station is enclosed

- Prep station is ventilated with an exhaust fan
- Prep station is not ventilated
- Can't tell if prep station is ventilated

G9. May I see the products you use for paint stripping?

Examine products for ingredients with methylene chloride.

- Yes, products with methylene chloride are used
- No, products with methylene chloride are not used
- Don't know/can't tell

G10. May I see your hazardous waste storage area?

CA Provider: Are all hazardous waste containers properly labeled with the words "hazardous waste" and clearly marked with the date on which accumulation began?

- Yes
- No
- Don't know

Note: CA provider will use best professional judgment to determine what is "clear" and "legible" and whether the shop made a "genuine and complete effort" to meet this requirement.

G11. CA Provider: What is the earliest date that accumulation began in any of the drums?

- _____ Month/year of earliest beginning accumulation date
- _____ Not sure / Drums poorly labeled

Note to CA provider: No storage limits for VSQGs; SQGs has a <4400lbs & 180 day limit, body shops are not expected to be LQGs.

G12. CA Provider: Are all hazardous waste containers closed unless waste is being added or removed?

- Yes
- No
- Don't know

Note: "closed" means that if the containers were tipped, nothing would spill. "Funnels" are acceptable if they are closed.

G13. CA Provider: Approximately how much hazardous waste is currently on site (excluding waste in satellite accumulation areas)?

- _____ Gallons of hazardous waste (approximate)
- _____ Not sure / Drums poorly labeled

G14. Can you please show me where you store used absorbent paint applicators such as shop rags and towels?

CA provider: are the containers closed when not in use?

- Yes, containers are closed

- No, containers are not closed
- Don't use rags, towels
- Don't know

G15. *Is there any indication of spills in or near the shop? CA provider will check for stains on the ground and in and around manholes, leaking tanks and containers and/or pooled liquids.*

- Yes
 - No
 - Comment
-

G16. *Does the shop appear to be operating in such a way as to violate the CAA 112(r)(1) general duty clause – namely: “The owners and operators of stationary sources producing, processing, handling or storing [a chemical in 40 CFR Part 68 or any other extremely hazardous substance] have a general duty [in the same manner and to the same extent as the general duty clause in the Occupational Safety and Health Act (OSHA)], to identify hazards which may result from... releases using appropriate hazard assessment techniques, to design and maintain a safe shop taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur.”*

- Yes, shop appears to violate clause
- No, shop does not appear to violate clause
- Undetermined

Thank you for your time.

Provide site visit debrief and compliance assistance.