

Auto Body Pilot Project Evaluation

Assessing the Environmental Results
Program in Washington State



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Executive Summary

Reaching more than 500 businesses in Washington, the **Auto Body Pilot Project** combined elements from both the U.S. Environmental Protection Agency’s **Environmental Results Program (ERP)** model and the EnviroStars certification program. The Department of Ecology enlisted the new Local Source Control Partnership to provide implementation assistance. This pilot project sought to assess whether an ERP integrated with a voluntary leadership program (EnviroStars) would improve compliance and sustainable business practices related to hazardous waste, air quality, and water quality.

Key Evaluation Results

Program Model and Incentives

Participation in the program was voluntary, and thus, the resulting positive changes in environmental behaviors were achieved without enforcement action.

- Both businesses and project team members surveyed preferred a **multimedia program covering air quality, water quality, and hazardous waste within a single industry** to separate programs.
- The multimedia approach posed challenges, however, as both businesses and team members reported that **the checklist of practices was too long**, and participation **required too much time**.
- Self-certified businesses stated they were motivated by the ability to **meet reporting requirements for USEPA’s new hazardous air pollutant rule (56%)**, and/or earn **EnviroStars certification (44%)**.

Outreach Methods and Participation

Outreach methods included informational mailings, a technical manual, site visits to document current practices, and a self-certification process, though businesses participated at different levels in the pilot.

- **Public agency lists proved more useful for identifying eligible businesses** than private data seller lists, but nonetheless these lists contained many closed or ineligible businesses.
- Over **half of businesses reached (53%) actively participated** in the program through site visits, the self-certification process, or both. The remaining businesses only received materials by mail.

Program Implementation and Self-Certification

Managing the multi-agency, multi-jurisdictional effort presented challenges including coordinating outreach and communication among project partners.

- **Technical assistance was limited due to insufficient staff resources for on-site assistance** (beyond checklist completion), staff changes, and challenges coordinating workshops with industry partners.
- Among active participants interviewed, **more than half of businesses reported satisfaction with the site visits, self-certification process, and technical assistance materials**.
- **Project team members reported lower levels of satisfaction** with each element, particularly the self-certification, for reasons ranging from dislike of the concept to implementation challenges.

- About **1 in 5 of the businesses contacted (19%) completed the self-certification** process.
- A number of businesses reported that **time concerns and confusion about the process were challenges or barriers to their participation** in the ERP pilot project.

Environmental Results

The program showed overall improvements at business that received site visits, though initial (baseline) compliance levels were relatively high for many practices.

- Data from the baseline and verification visit checklists on implementation rates show that **compliance increased among businesses that received site visits**.
- Measured **average implementation rates increased between baseline and verification site visits** for air and dangerous waste *compliance* items and for air, water, and source control *best practices*.

Lessons Learned

Overall, **participating businesses increased their environmental compliance**, although self-certification participation fell short of goals, and the pilot had **limited success in moving businesses beyond compliance**. Both businesses and the project team stated their preference for a **comprehensive, multimedia** program model. A **mandatory program** could increase self-certification and environmental results, though such an effort may be poorly received and could hinder overall cooperation between businesses and Ecology. Offering **financial assistance (particularly equipment vouchers and tax breaks), public recognition, and reduced inspections** could increase voluntary participation.

The pilot project's experience with **business outreach and program implementation** suggests the following areas for future improvements:

- A **shorter, electronic checklist** could reduce outreach costs and support self-certification.
- Providing **multiple ways to access technical information**, including easily searchable electronic files and simple fact sheets, can increase the effectiveness of outreach.
- Businesses need **clear and timely information on program expectations, self-certification submittals, and answers to their questions**.
- **Effective partnerships with industry associations, vendors, and leading businesses** can increase reach and effectiveness of program recruitment, workshops, and other efforts.
- Early, close, and ongoing **communication and coordination with local partners and field staff, with clear goals**, would help improve outreach and support more consistent delivery of services.
- **Coordinating closely with other agencies addressing related issues** can increase business participation and reduce overall costs and time investments by streamlining efforts.
- Ecology management's regular **review of project progress and active solicitation of input** from local partners and businesses would support early identification of issues and effective implementation.

The following evaluation summary report and its appendices address these topics in more detail.

1. Introduction and Overview

Under a grant from the U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology) conducted outreach to more than 500 auto body shops in the Puget Sound region and Spokane River basin in 2008–2010. This innovative **Auto Body Pilot Project** combined elements from EPA’s **Environmental Results Program** (ERP) model and the multi-county EnviroStars certification program with implementation assistance from the new Local Source Control Partnership.

The ERP model begins with the premise that while individual facilities may release only small amounts of pollution, their combined impacts can be significant. The Massachusetts Department of Environmental Protection originally developed its Environmental Results Program over a decade ago as a cost-effective strategy to improve and measure performance in targeted sectors. With USEPA’s support, more than one-third of U.S. states have developed or are implementing at least one ERP. Washington State’s pilot project sought to assess whether an ERP integrated with a voluntary leadership program (EnviroStars) would improve sector compliance and encourage businesses to move beyond compliance toward more sustainable practices.



As shown in EPA’s illustration above, ERP combines **compliance assistance** and outreach on key environmental issues, facility **self-certification** regarding environmental performance, **site visits** (inspections) for performance verification and assistance, and statistically based performance measurement.¹ With its model of using efficient outreach to move businesses to self-certify, with or without an initial site visit, ERP is designed to increase both compliance and adoption of best management practices.

Conducted with assistance from local jurisdictions, the Auto Body Pilot Project provided informational materials, site visits, and a voluntary self-certification process to help shops meet and exceed environmental regulations. Program materials included a technical assistance manual as well as a checklist of compliance requirements, best management practices (BMPs), and other items for self-certification or site visits.

This multimedia, sector-based project offered businesses assistance in improving their environmental performance in multiple areas (hazardous waste, air quality, and water quality). Ecology expanded the air quality element beyond the initial project scope to offer auto body shops an opportunity to meet the Notification of Compliance required under USEPA’s new Area Source Rule for hazardous air pollutants from paint stripping and coatings as part of the self-certification process. Ecology also partnered with EnviroStars, a multi-county business certification program, to provide auto body shops with an additional incentive to self-certify through ERP. The main goals of the pilot project were to:

- Assess the ERP model when used in Washington and combined with a voluntary leadership program.
- Increase compliance and adoption of best management practices.
- Move businesses to voluntarily self-certify their environmental compliance and adoption of BMPs.
- Increase the number of EnviroStars-certified businesses.

¹ Figure and description of ERP from U.S. Environmental Protection Agency’s *ERP States Produce Results: 2007 Report*, published December 2007 and available online at <http://www.epa.gov/erp/files/2007reportfull.pdf>.

Like many pilot efforts, the ERP Auto Body Pilot Project faced particular conditions that should be considered when evaluating its results, including the following:

- **Sector choice.** The target audience of auto body businesses had previously received outreach and technical assistance since the 1990s, including prior state and county campaigns such as Shop Sweeps. The project team selected the auto body sector in part due to this prior outreach, though later criticism emerged that the site visits were not addressing the worst risks (across all hazardous waste generators) first because many targeted business already had relatively high compliance.
- **Deployment.** Ecology relied on local staff members of the new Local Source Control (LSC) Partnership to conduct site visits around the state. The LSC Partnership itself was a new entity facing the usual challenges in program start-up, and some outreach staff members were less experienced in conducting site visits. Site visits for ERP represented less than one-tenth of the LSC Partnership's total number of site visits conducted during the project period, so ERP was not its central focus.
- **Project management challenges.** Ecology's core project team planned the project, developed outreach materials, and followed up with self-certifying business, while staff members of the new Local Source Control Partnership (local to each participating jurisdiction) conducted most site visits. Ecology encountered challenges in establishing and coordinating the new ERP and LSC programs.
- **Severe weather.** Unusually strong winter storms may have reduced businesses' willingness to complete site visits or self-certify. Outreach staff members reported that auto body shops were particularly busy—and less willing to spend time on a voluntary program—due to increased collisions during the icy winter of 2008–2009.
- **Recession.** The weak economy during the pilot project may have limited the willingness of some shops to participate in a new voluntary program.

To assess the effectiveness of the ERP pilot project and to identify lessons learned that can be applied to future business outreach and voluntary compliance programs, the Department of Ecology analyzed program data and hired Cascadia Consulting Group to contribute to an evaluation of the pilot project. This summary presents evaluation findings and lessons learned to consider in planning future efforts.

2. Evaluation Methodology

To evaluate the ERP Auto Body Pilot Project in relation to the project's goals, Cascadia collected information through surveys of members of the ERP project team as well as telephone interviews with business participants and other key stakeholders. Cascadia also reviewed and summarized an analysis of program data conducted by the Department of Ecology.

Data provided by Ecology included the following materials:

- Ecology's analysis of data collected from site visits and self-certification forms on compliance, implementation of best management practices, and adoption of additional preferred practices.
- Project activity data on businesses contacted, site visits, and project promotion.
- Existing project documents, such as outreach materials and progress reports.

Cascadia worked with Ecology to develop instruments for a web-based survey of project team members and phone interviews of business participants, auto body business associations, and paint vendors. Surveys and interviews addressed satisfaction with the project, challenges and barriers to participation, motivations and incentives for participation, effectiveness of program elements, opportunities for improvement, and lessons learned. Business participants were divided into three groups, from which a small random sample of interview subjects was selected:

- Businesses that completed the self-certification process (**self-certified participants**).
- Businesses that received a site visit and did not self-certify (**visit-only participants**).
- Businesses that received only informational materials and declined to participate further (referred to as mail-only participants or **non-participants**, though they were still included in the program and received materials).

In addition, Cascadia contacted two auto body business associations, interviewed a board member of an auto body association, and interviewed a paint vendor familiar with ERP. Their responses were generally similar to those from business participants.

Table 1 presents the number of individuals surveyed or interviewed for this project. The intent of the surveys and interviews was to gather in-depth, qualitative information from project participants rather than statistically significant quantitative data. Due to the small number of business participants interviewed, margins of error at the 90 percent confidence level for these populations range from approximately 17 to 22 percent.

Table 1. Number of Evaluation Survey and Interview Respondents

Group	Respondents
Businesses (phone interviews)	47
Completed self-certification	18
Received site visit only (not self-certified)	15
Received only informational materials (non-participants)	14
Other Stakeholders (phone interviews)	2
Board members of auto body business associations	1
Paint vendors	1
ERP Pilot Project Team (web-based survey)	34
Local Source Control Specialists	21
EnviroStars leads	3
Ecology team members	9
USEPA Air team members	1

Additional information on methodology and results can be found in this report’s appendices:

- Appendix A. Evaluation Methodology
- Appendix B. Business Performance Metrics
- Appendix C. Business Interview Results with Data Tables
- Appendix D. Project Team Survey Results with Data Tables
- Appendix E. Phone Interview Guides and Survey Instruments

3. Evaluation Results

Program Model

Washington’s ERP pilot project focused on a single sector—auto body shops—with a multimedia approach, covering compliance and “beyond compliance” best management practices for air quality, water quality, and hazardous waste.

Both businesses and project team members surveyed preferred a multimedia program covering air quality, water quality, and hazardous waste within a single industry, rather than separate programs. The vast majority of active participants surveyed (94%) said they prefer a single, comprehensive program that covers air, water, and hazardous waste, rather than separate programs focused on each area. Similarly, most team members surveyed prefer a comprehensive program (79%). Half of project team members surveyed said they prefer a program targeted at a single industry sector. About one-third (32%) prefer a broader, multi-sector program, and about 20 percent expressed no preference.

Implementing a multimedia approach posed challenges, however, with both businesses and team members reporting the **checklist of practices was too long, and the pilot required too much time**. The most common suggestions from the project team on the checklist and site visits were to shorten them (78%) and to simplify the process and make it more user-friendly (37%).

Participation

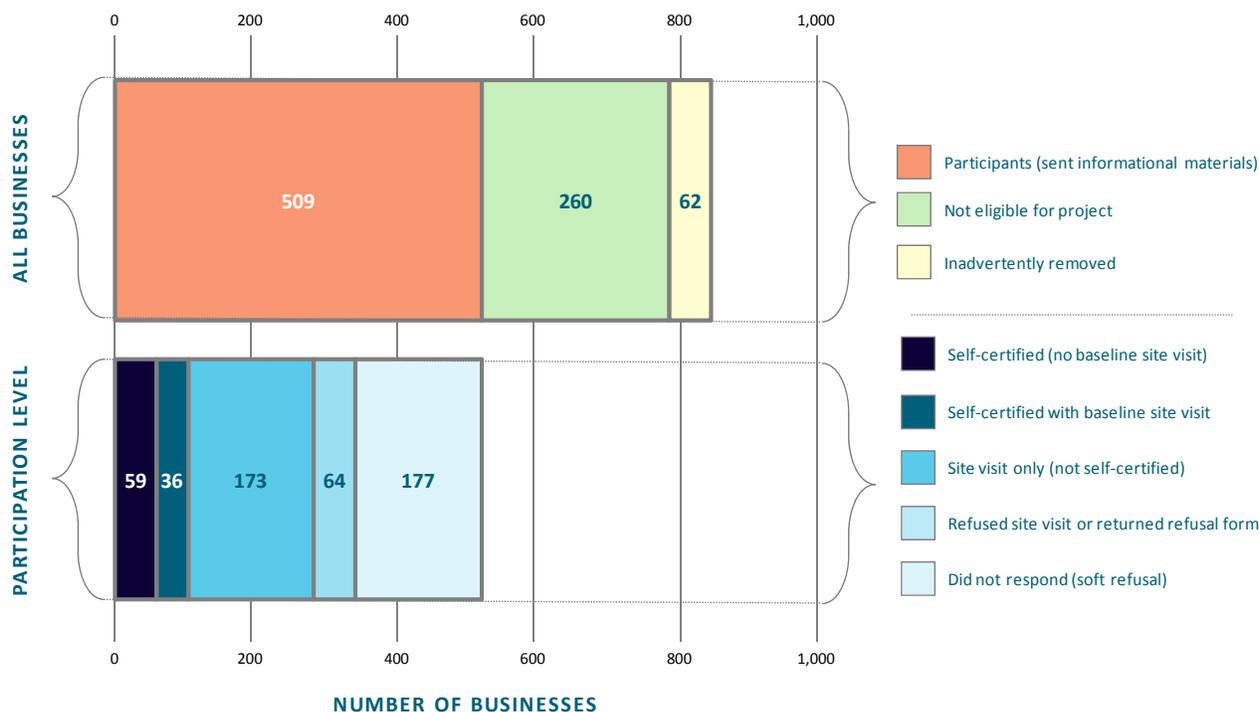
In 2008–2010, the ERP Auto Body Pilot Project reached **509 auto body shops** with informational mailings, a technical manual, site visits, and/or a self-certification process. Some of the businesses received mailings only and did not participate in site visits or self-certification; these auto body shops that did not actively take part in the ERP pilot are referred to in this summary as mail-only businesses or non-participants.

The project had difficulty compiling reliable contact lists of businesses in the sector: nearly one-third of the targeted businesses were closed or otherwise ineligible for the project. The Auto Body Pilot Project used several lists from state agencies, local air authorities, and a private-sector source to identify an estimated 831 auto body shops in the targeted areas in Washington State. Over the course of the project, 260 businesses were found to be closed or otherwise ineligible for the project, and other businesses were inadvertently removed from the list (62).

The list of companies registered with the Department of Labor and Industries was the project’s primary reliable source of business contacts, supplemented with lists from local air authorities. In contrast, a list of businesses purchased from a private-sector data purveyor proved unreliable. During the pilot, field staff made many updates to improve the business database list.

The program mailed informational materials to 509 auto body shops, of which slightly more than half (268 businesses, or 53%) actively participated through the self-certification process, site visits, or both. The remaining businesses only received materials by mail. Figure 1 presents the number of businesses on the contact list and their levels of participation in the ERP pilot.

Figure 1. Participation Levels in ERP Auto Body Pilot Project



Site visits were a key program element focused on documenting current practices on a checklist of items. Local Source Control Specialists and Ecology staff members completed 296 baseline and verification site visits at randomly selected businesses. Some businesses were visited more than once. Some businesses conducted self-certifications, either with or without an initial (baseline) site visit. Site visits were intended primarily for documentation and verification of practices, rather than providing technical assistance. (Ecology originally intended to provide separate technical assistance between the baseline and verification visits, but the assistance did not occur as planned due in part to staffing constraints.)

Over half of businesses reached (53%) actively participated in the program through site visits, the self-certification process, or both. As shown in Figure 1 above, 59 businesses completed the self-certification process without first receiving a baseline visit; 36 businesses self-certified after receiving a baseline site visit; and another 173 businesses received a baseline or verification site visit but did not self-certify. (Some self-certified business also received verification visits).

In addition, 32 businesses submitted EnviroStars applications through the self-certification process. Of these businesses:

- Seven (7) became new EnviroStars-certified businesses through the ERP pilot project.
- Five (5) were already EnviroStars participants and submitted new applications.
- Seven (7) were ineligible because they were located in counties that were not participating jurisdictions in the EnviroStars program.

- Thirteen (13) businesses were located in participating jurisdictions but did not become EnviroStars-certified for various reasons.

In addition to the five EnviroStars businesses that submitted new applications through the ERP project, another 20 businesses were already EnviroStars participants before the pilot.

Outreach Methods

The project team promoted the pilot through mailings of informational packets, site visits, word-of-mouth (particularly by paint vendors), a website, coordination with industry groups, and technical assistance workshops. In the initial planning stages and during the pilot project, the project team worked with two industry associations: the Autobody Craftsman Association (ACA) and the Automotive Service Association of Washington (ASA). The associations participated in a project advisory committee, calls and meetings with the agency project team, and project promotion.

One association helped produce informational posters, promoted the project and workshops on its website, and offered a discounted booth at its trade show for the pilot program. The other association initially participated, including hosting a project team training session at a member's auto body shop, but the association later experienced management challenges that hindered continued involvement. Paint vendors also proved to be a good channel to reach auto body shops on the specific goal of promoting water-based paint and alternative application methods, according to the project team.

The majority of businesses surveyed recalled learning about the project through a mailing or site visit from a project staff member. Several businesses also said they learned about the program through word-of-mouth, industry associations, or paint vendors. Members of the project team suggested improving project promotion by working more with trade groups (39%); improving communication and coordination (18%), particularly not canceling scheduled workshops; simplifying the program (14%); increasing direct contact with phone calls and site visits (11%); and offering incentives including regulatory flexibility (11%).

Site visits appeared to support business improvements, but they are a resource-intensive form of outreach. Local Source Control Specialists had limited time to provide technical assistance beyond completing the checklist, and assistance was not the focus of their visits. Ecology intended to offer assistance separate from the baseline and verification visits, though it did not occur as planned.

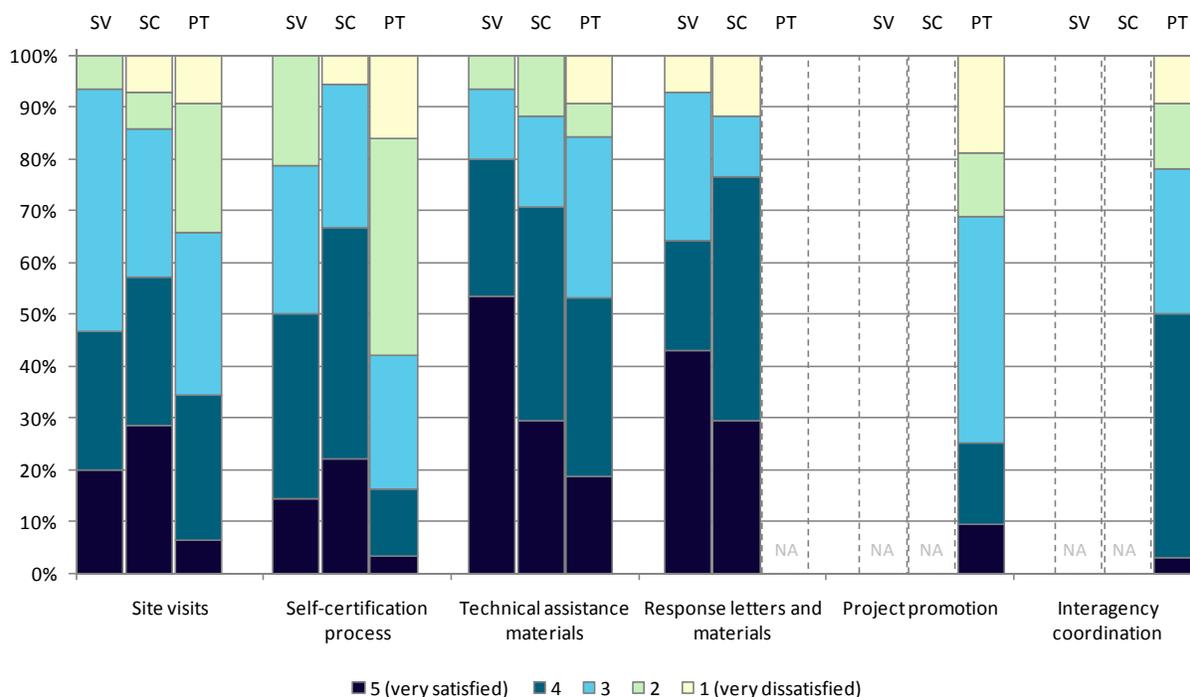
Workshops conducted during the pilot generally had low participation. Project team members suggested that potential causes included insufficient promotion resulting from an abbreviated schedule, confusion about workshop dates, and overly long workshops (four hours). Due to low participation at the initial workshops, additional planned workshops were cancelled, sometimes on short notice—generating frustration and disappointment among both businesses and program staff, according to members of the project team.

Program Implementation

Ecology teamed with the **new Local Source Control Partnership to conduct much of the direct outreach and assistance to businesses.** Managing the effort, coordinating activities, and ensuring clear communication among the multiple participating jurisdictions and agencies presented challenges. Members of the project team reported that the pilot had **insufficient staff resources to conduct an effective technical assistance campaign.** Staff changes and difficulties coordinating with industry associations and paint vendors limited the ability of program staff to provide on-site technical assistance tailored to each business. Most site visit efforts focused on completing the checklist, as intended, while technical assistance was available indirectly through the manual, website, and other materials. Site visits for ERP represented only a small share of the Local Source Control Partnership’s total number of site visits during the project period. In addition to the LSC Partnership’s work around the state, Ecology staff conducted a small number of site visits, completing verification visits in Seattle only.

Among active participants interviewed, **more than half of businesses reported they were satisfied or very satisfied with the site visits, self-certification process, and technical assistance materials,** as shown in Figure 2. When asked how they recommended improving the program, common suggestions from active participants interviewed were to provide more and clearer information, streamline the program, improve coordination across agencies, and address non-compliant or illegal shops.

Figure 2. Respondent Rating of Project Elements
(where 5=very satisfied and 1=very dissatisfied)



Note: Chart excludes individuals who responded “don’t know.”

SV = Businesses that received **site visits** but did not self-certify (not asked about project promotion or interagency coordination).

SC = Businesses that completed the **self-certification** process (not asked about project promotion or interagency coordination).

PT = Members of the **project team** (not asked about response letters and materials).

When asked whether any elements of the pilot project sounded useful for their business, respondents that only received mailed information (also referred to as non-participants) did not mention any element more than another. The most common response was that they are already doing enough on the issues or that none of it sounded useful.

In contrast with business participants, **project team members generally reported lower levels of satisfaction with each of the program elements.** More than half (58%) of the project team reported they were dissatisfied or very dissatisfied with the self-certification process. Project team members mentioned not liking the self-certification concept, thinking self-certification works for only lower-risk businesses, wanting more business rewards for participation or penalties for non-participation, and deeming the implementation confusing and inefficient. More than one-third (34%) were dissatisfied or very dissatisfied with the site visits and checklist.

Just over half (53%) of the program staff surveyed reported that they are very or somewhat interested in participating in similar projects in the future.

Both businesses and project team members reported the highest satisfaction levels for the technical assistance materials, in comparison with other program elements. About one-third of the project team respondents praised the materials for being comprehensive, and another third had no suggestions for improvement. Common suggestions for improvement were to simplify the materials or combine the manual with shorter documents and to provide information in alternative formats, including electronic forms. (In February 2009, the ERP pilot distributed the technical assistance manual and self-certification packet, and Ecology later mailed businesses a compact disc containing links to technical assistance materials in April 2010.)

Regarding obstacles they faced to participating in the ERP pilot, **multiple businesses reported that time concerns and confusion about the process were challenges or barriers to participation.** Commonly mentioned challenges among active participants were that the project was too complicated or confusing; the project took too long; the assistance was not helpful; or the project was inconvenient. Nearly a quarter of respondents among active participants reported facing no challenges when participating in the pilot project.

Interview respondents among businesses that only received mailed information (non-participants) noted the effort took too long or that they did not have time to participate, that they were already addressing the issues in other ways, that the program was not applicable due to the size or nature of their business, or that they were not interested.

Self-Certification

The pilot's voluntary model offered businesses an opportunity to move "beyond compliance" and to self-certify their adoption of environmental practices. As an incentive to complete the self-certification, auto body shops could use the process to become EnviroStars-certified and to meet the Notification of Compliance required under USEPA's new Area Source Rule for hazardous air pollutants. Ecology mailed auto body shops self-certification packets that included the technical assistance manual, self-certification checklist, and EnviroStars application (for businesses in participating EnviroStars counties).

Few businesses self-certified without a baseline site visit—about 12 percent of all businesses contacted, as shown in Figure 1 on page 6. Additional businesses completed the self-certification process after receiving a baseline site visit, bringing the total share of self-certified businesses to 19 percent. (A portion of self-certified businesses, both with and without baseline visits, later received verification visits.)

Two-thirds of self-certified businesses reported that they were very satisfied or satisfied with the self-certification process, as shown in Figure 2 above.

In contrast, **over half (58%) of the project team reported dissatisfaction with the self-certification process**. The most common suggestions from the project team for improving or changing the self-certification process were to make the process and form shorter and clearer (38%); provide incentives or penalties for businesses (21%); combine the form with direct contact (17%); improve communication and responsiveness (17%); and eliminate the self-certification process (17%). In a separate, open-ended question about lessons learned, project team respondents suggested supporting or confirming self-certification with site visits, following up with non-participating businesses, and making self-certification a mandatory process.

Incentives

Businesses interviewed reported they would respond to a variety of incentives to participate and self-certify, and some reported experiencing benefits from participation in the pilot project.

More than half of self-certified businesses interviewed said they were motivated by the ability to satisfy U.S. Environmental Protection Agency air requirements under the new Area Source Rule for paint stripping and coatings. EPA has not had the resources to review the air quality forms received and assess how many businesses used the self-certification process to meet their federal regulatory obligations under the Area Source Rule, but 78 shops filled out the EPA notification form as part of their self-certification packets. Submitting a self-certification form satisfied the requirement to submit an Initial Notification to EPA. Depending on the shop's practices, the signed self-certification form could also count as the Notification of Compliance to EPA.

In a separate question, more than 40 percent of self-certified businesses interviewed said that the opportunity to **become EnviroStars-certified** motivated them to self-certify. Ultimately, however, a much smaller portion of those businesses expressing interest in becoming EnviroStars received new certifications through the program: only seven businesses in total.

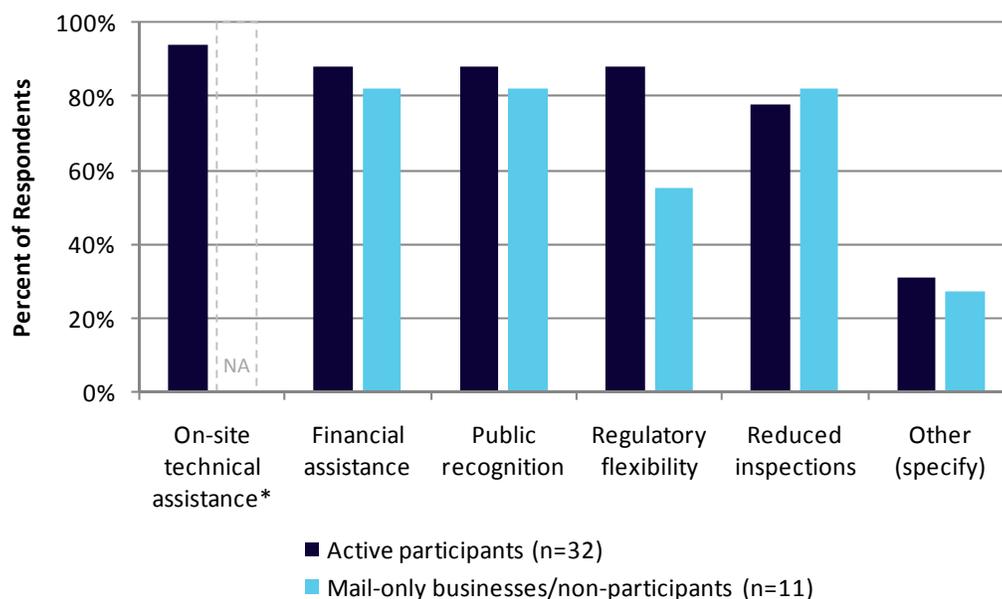
Most businesses interviewed said financial assistance (particularly equipment vouchers and tax breaks), public recognition, and reduced inspections would motivate them to participate. When asked to identify which incentives would motivate them to participate in a voluntary compliance program, a large majority of respondents from both actively participating businesses and businesses that only received mailed information (non-participants) selected financial assistance, public recognition, and reduced inspections, as shown in Figure 3.

Businesses in both groups most commonly mentioned equipment vouchers and tax breaks as preferred forms of financial assistance. A large majority of respondents from actively participating businesses also expressed a desire for on-site technical assistance and regulatory flexibility, while about half of non-

participants chose regulatory flexibility. (Non-participants were not asked about on-site technical assistance, since they had previously declined such assistance.) Other incentives mentioned included addressing illegal shops and streamlining the participation process and regulations.

Figure 3. Incentives that Would Motivate Business Participation

(multiple responses allowed)



**Not asked of businesses that received mailings only (non-participants).*

The most common benefits reported by participating businesses interviewed were learning what they should be doing, being able to do the right thing, coming into compliance, and being able to run their businesses better or more safely. Nearly one-third reported that they experienced no benefits.

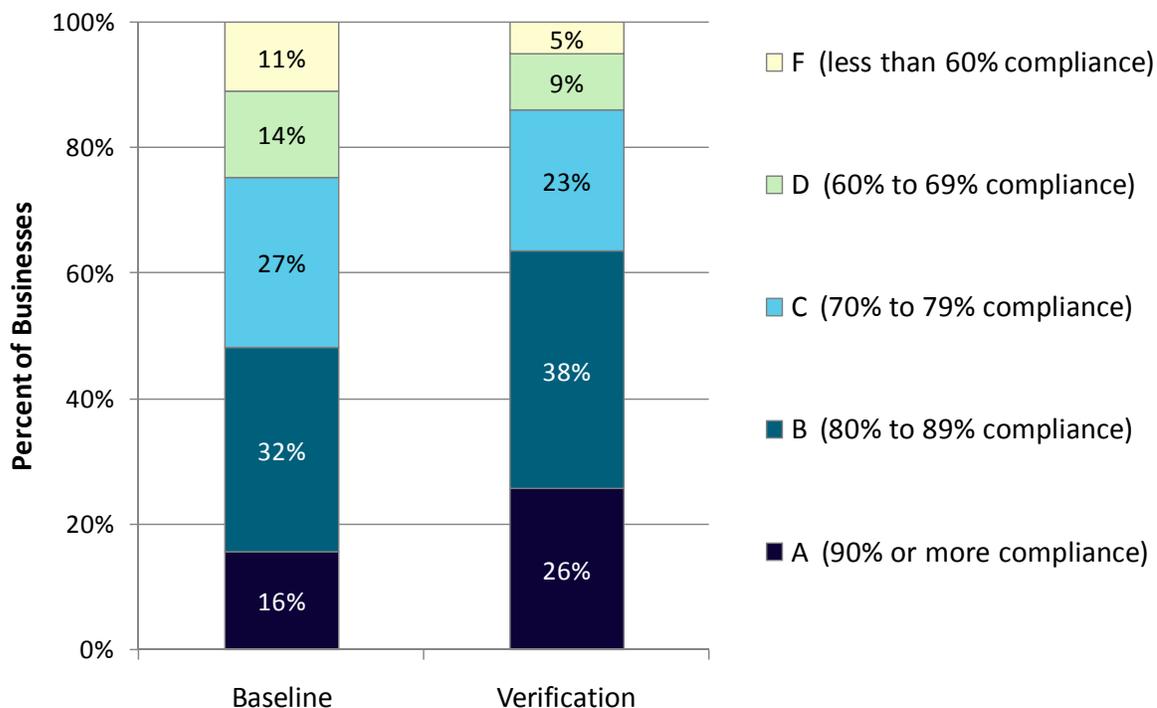
Environmental Results

Environmental results were assessed using Ecology’s analysis of data from the baseline and verification visit checklists to provide information on implementation rates for individual checklist items. Each checklist item addresses a specific practice, such as keeping dangerous waste containers closed. These items can be grouped by environmental area (such as dangerous waste, a term used interchangeably with hazardous waste in this evaluation), regulatory status (whether the item is a compliance requirement or a best management practice), or other categorizations of interest (such as Ecology’s Environmental Business Practice Indicators).

Ecology’s data analysis categorized individual businesses by their overall implementation rate for compliance requirements: **a business’s overall compliance rate** was calculated by dividing the number of compliance items it implemented by the total number of compliance items on the checklist. From the baseline visits to the verification visits, the share of **businesses that earned an “A” grade on compliance items (implementing at least 90% of compliance items) increased by more than 60 percent, and the**

share of businesses that earned a “D” or worse (complying with fewer than 70% of items) was cut in half, as shown in Figure 4.

Figure 4. Share of Businesses by Percentage of Compliance Items Implemented



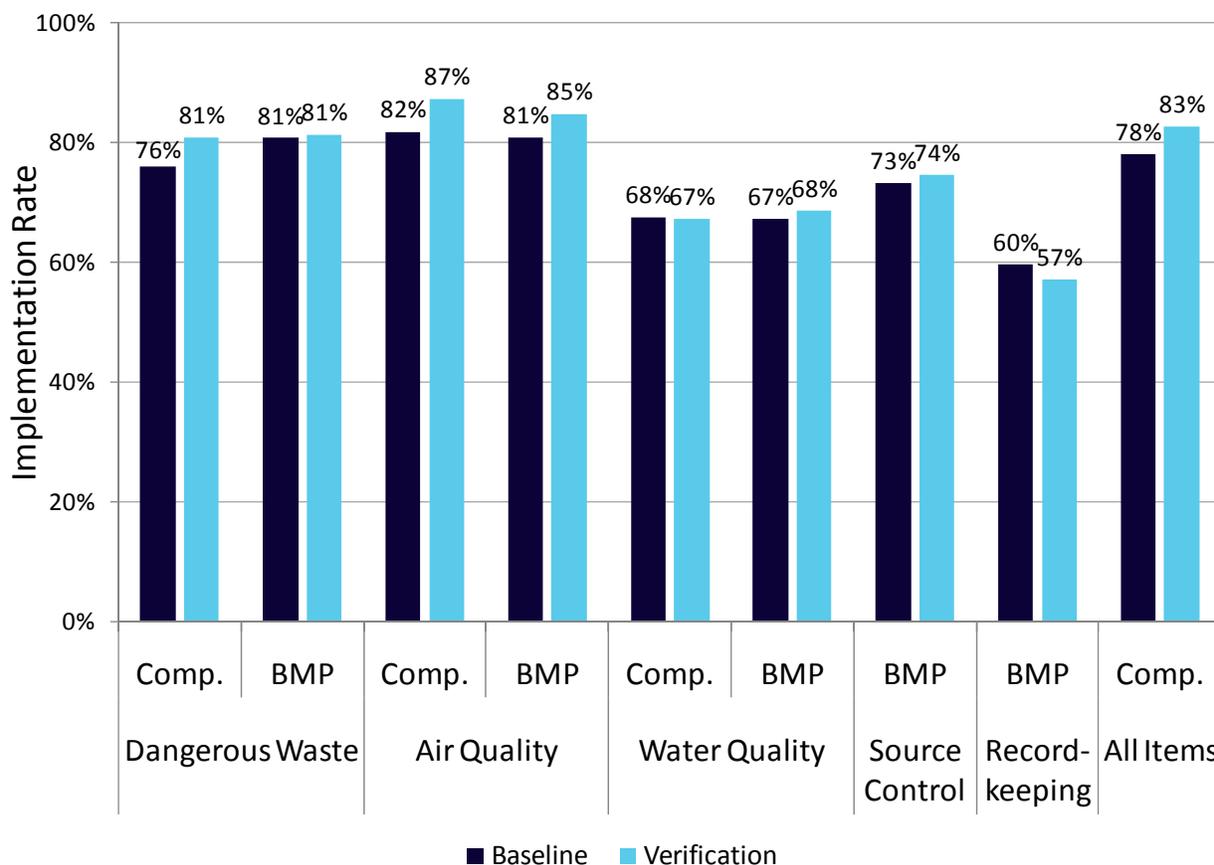
Note: Compliance rates for individual businesses were calculated by dividing the number of compliance items that the business implemented by the total number of compliance items on the checklist (28).

Ecology also calculated **implementation rates for individual checklist items** by dividing the number of businesses that implemented the item by the total number of businesses visited. During verification visits, project staff found that **implementation rates were high for three-fifths (17 of 28) of the compliance items, with at least 80 percent of businesses visited complying with the requirement.** Baseline compliance levels were also relatively high for many practices, perhaps reflecting the results of prior assistance to this sector. The relatively high baseline levels for many practices left less room for large improvements in than a sector with lower baseline levels. (Some project team members noted that the Massachusetts ERP may have achieved more dramatic results because many businesses had more room to improve—that is, they were starting from a lower baseline than in Washington.)

Average implementation rates for checklist categories were calculated by adding up implementation rates for each individual checklist item in a category (e.g., air quality) and dividing by the total number of checklist items in that category. For example, if one item was implemented by 100 percent of businesses and another item was implemented by only 50 percent of businesses, the average implementation rate for those two items together is 75 percent of businesses.

Measured average implementation rates appeared to increase between baseline and verification site visits, for air and dangerous waste *compliance* items and for air, water, and source control *best management practices* (though not all changes are necessarily statistically significant), as shown in Figure 5. Overall, measured implementation rates in verification visits were highest for air quality compliance items, followed by air quality best management practices, dangerous waste compliance items, and dangerous waste best management practices.

Figure 5. Average Implementation Rates, by Environmental Area and Regulatory Status



*Note: Category averages were calculated by taking the average of implementation rates for all items in each category. Each topic area was divided into **compliance requirements** (Comp.) and voluntary **best management practices**/"beyond compliance" efforts (BMP). No items in the Source Control or Recordkeeping categories required compliance.*

Based on Ecology’s data analysis, measured **implementation rates changed from baseline to verification visits by a statistically significant amount** for 14 checklist items, as shown in Table 2 below.

Table 2. Measured Implementation Rate Changes—Significant and Outside the Margin of Error

Checklist Question Text	Baseline	Verification	Change* (% points)
Dangerous Waste			
Are all hazardous waste containers properly labeled?	56%	70%	+15%
Are all hazardous waste containers properly labeled with the risk hazard of the chemical (i.e., toxic, flammable, etc.)?	62%	74%	+11%
Is mercury-containing equipment (fluorescent/HID lamps, thermostats, batteries, and auto switches) handled as dangerous waste or recycled as universal waste?	74%	85%	+11%
Does the facility have an employee program that teaches employees proper hazardous waste management procedures?	69%	79%	+10%
Are waste containers closed except when materials are being added or removed?	69%	79%	+10%
Does the hazardous waste accumulation area have secondary containment for spills and leaks?	57%	67%	+10%
Air Quality			
Is a log kept in the O&M manual documenting periodic inspections of shop equipment, repairing of defects, and training and assigning people to carry out the plan?	35%	68%	+32%
If the facility uses a spray booth or prep station, is it fitted with a type of filter technology or system that has been demonstrated to achieve at least 98 percent capture of paint overspray (this would include polyester fiber or fiberglass filters)? [†]	51%	72%	+21%
If the facility has high transfer efficiency painting training in place, is the training documented?	59%	74%	+16%
Does the facility have documentation of the amount of coatings used that contain chromium, lead, cadmium, nickel, and manganese (especially hexavalent chromium, most common in corrosion control undercoats and red, orange, and yellow paint colors) and the metals content of these coatings?	32%	46%	+14%
Does the facility use ventilated sander (dustless vacuum) equipment that captures paint dust and body filler, or an overhead capture system?	22%	33%	+11%
Management and Recordkeeping			
Is there any indication of spills in or near the shop? (Percentage represents responses of “no.”)	91%	82%	-9%
Does the facility work with vendors/jobbers to find less hazardous products (such as water-based or other low VOC coatings)? [†]	86%	73%	-13%
Water Quality			
Is all outside waste under cover and not in direct contact with soil?	39%	76%	+37%
Source Control			

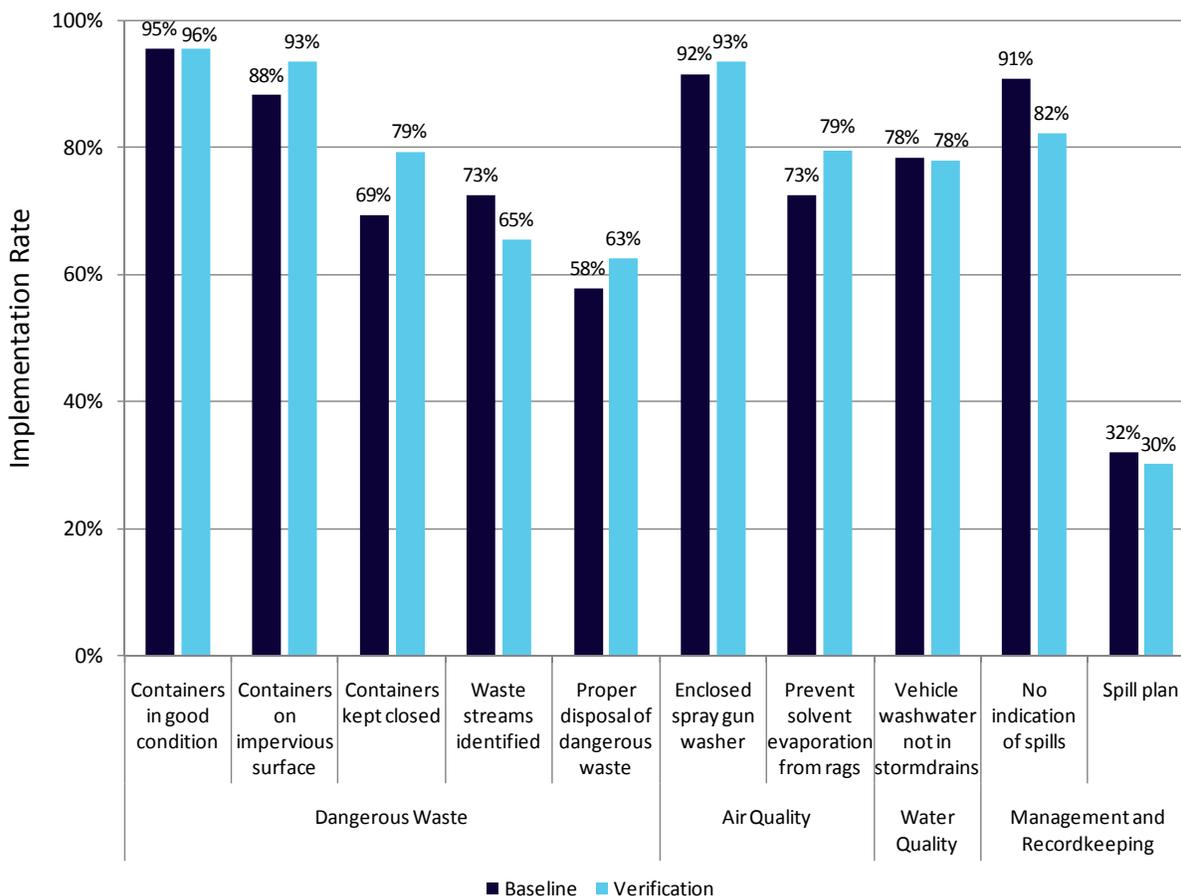
Measured implementation rates did not change significantly and outside the margin of error for any Source Control items.

* Numbers may not sum exactly to totals due to rounding.

[†] Ecology team members expressed doubts about the validity of these results, particularly questioning the number of businesses upgrading their paint spray systems in the current economy or the decrease in businesses working to find less hazardous products. In addition, practices related to proper recycling of dangerous wastes and to wastewater or stormwater discharge that showed significant changes are not presented in this table because Ecology considered the results unreliable due to changes in the wording of questions. Appendix B presents a complete table of implementation rates from baseline and verification visits.

Ecology identified 10 **key checklist items** of interest, which often indicate broader environmental problems, as shown in Figure 6. Based on Ecology’s data analysis, measured implementation rates for these practices increased significantly for keeping hazardous waste containers closed (69% to 79%) and decreased significantly for having no indication of spills near the shop (91% to 82%). Other changes in implementation rates were not significant and were within the margin of error. In verification visits, measured implementation rates exceeded 80 percent for 4 of the 10 checklist items. Overall, implementation rates measured during verification visits were lowest for the best management practice of having a spill plan (30%).

Figure 6. Implementation Rates for Key Checklist Items during Baseline and Verification Visits



The pilot project also encouraged auto body shops to **switch to waterborne paint systems**. About 17 percent of participating businesses interviewed reported they already use a waterborne system, and another 60 percent of participants interviewed said they were considering investing in such a system in the next one to three years. Among all businesses that previously received a verification visit during the ERP pilot, the project team found that about 16 percent of businesses were using a waterborne paint system, consistent with the interview results.

4. Lessons Learned and Next Steps

The Department of Ecology does not intend to continue the Environmental Results Program Auto Body Pilot Project as conducted in 2008–2010, but the agency anticipates that tools and lessons from the pilot will be useful in the future. The project team experienced difficulties implementing a voluntary ERP based on the mandatory approach developed in Massachusetts.

Experience from the ERP auto body pilot could be applied to future business programs by using effective elements of the model and learning from its challenges. Accordingly, this evaluation is intended to identify lessons from the pilot that could apply to other business outreach and voluntary compliance programs, both existing and future efforts. Based on the evaluation research, analysis, and experience elsewhere, the evaluation team identified the following lessons learned and opportunity areas for planning future efforts.

Lessons Learned and Opportunities for Future Efforts

Environmental Results

- **Washington’s Auto Body ERP Pilot had less impact than the program in Massachusetts**, possibly because the targeted sector had already received several technical assistance campaigns, and voluntary programs by nature have lower participation than mandatory programs.
- Though overall participation fell short of expectations, **participating businesses increased compliance** between baseline and verification visits. The share of grade “A” businesses (complying with 90% or more of requirements) increased by more than 60 percent, while the share of grade “D” or worse businesses (complying with fewer than 70% of items) was cut in half.
- The pilot project had **limited success on moving businesses beyond compliance** to adopt voluntary best management practices and become EnviroStars-certified. While implementation of best management practices increased, only a few businesses became EnviroStars-certified through ERP.

Program Model

- Both businesses and the project team **prefer comprehensive, multimedia programs** that address multiple environmental areas, including hazardous waste, air quality, and water quality.
- Half of the project team prefers an **industry sector-specific program** (20% expressed no preference). Industry-specific programs and assistance can complement broader outreach and information.
- Some businesses surveyed said programs should address illegal auto shops. To help level the playing field for participating businesses working to improve the practices, **illegal shops could be visibly addressed**. One way to do so could be through increased promotion of Ecology’s existing website and hotline where businesses and individuals can report spills and environmental problems; illegal auto shops could be added as an example of an environmental problem.

- As implemented in the ERP pilot, the **business participation in self-certification was relatively low**, which raises questions about the efficacy of this program model. Businesses may need more direct assistance, positive incentives, consequences for non-participation, or a mandatory program to spur participation. Self-certification may work better with a simpler program that focuses on only one topic area, rather than a multimedia approach, to simplify and shorten the process and checklist.

Outreach Methods

- The extensive checklist containing more than 100 questions posed a challenge for both businesses and field staff. A **shorter checklist** that enables **electronic data entry** directly into the form could reduce outreach costs, simplify and speed the process, and support participation in self-certification. The electronic version could be online and available for businesses pursuing self-certification.
- Project team members surveyed requested that the technical assistance manual be provided in both print and searchable electronic formats and be supplemented with fact sheets or other brief summaries. Providing **multiple ways to access technical information** can increase the effectiveness of outreach materials. While a comprehensive manual is important, simpler materials can help businesses get started and prevent them from feeling overwhelmed. An electronic manual (online or on CD/DVD) allows businesses to find topics of interest, but hard-to-reach businesses may be more likely to look at a readily available printed manual than to seek out an electronic version.
- Businesses interviewed asked for **clear and timely information on program expectations, review of self-certification submittals, and responses to their questions**. Keeping businesses informed about requirements, progress, and schedules can help support ongoing participation and satisfaction.
- Promotion methods reported as effective included **mailings, site visits, and word-of-mouth**. Combining relatively low-cost mailings and higher-cost site visits with **phone calls and partnerships with industry associations, vendors, and leading businesses** can increase reach and effectiveness. Following mailings and visits by project staff (the top responses), businesses reported they learned about the program through word-of-mouth, particularly from industry associations or paint vendors. These groups can help the program reach its intended audiences as well as encourage businesses to participate. As an alternative or variation to the ERP model, other effective outreach programs have used short drop-in site visits or phone calls to ensure that targeted businesses have received mailed information, answer questions about the program, and offer assistance.
- **Considering program costs and results**, though not part of the pilot, would aid future program planning by helping Ecology identify cost-effective elements of ERP compared with other models.
- The workshops were poorly attended. **Conducting workshops in partnership with industry associations and vendors** (particularly in conjunction with existing industry meetings or conferences) and publicizing them more may improve attendance. Future efforts may benefit from exploring workshop tactics that have worked well in programs elsewhere and testing alternative methods for promotion and outreach.

Program Implementation

- Local Source Control Specialists provide a direct link to businesses in the field. **Input from field staff** can help ensure outreach materials and strategies are effective for the target audience and goals. Local outreach staff can offer insight on the needs, attitudes, constraints, and terminology of the target audience (such as whether to refer to the sector as “auto body” or “collision repair”), as well as regarding differences in local compliance requirements.
- Project team members reported gaps in communication between Ecology and Local Source Control Specialists. Early, close, and ongoing **communication and coordination with local partners and field staff, with clearly articulated goals**, would help identify and address challenges as well as support more consistent delivery of services. Nearly half of the project team members (44%) surveyed recommended increasing communication with local partners, particularly regarding expectations, project design, and timelines.
- The new Local Source Control Partnership was in its own start-up stage during the ERP pilot project; **working with a more established partner would likely make implementation more predictable**.
- For a comprehensive program, **focused training to outreach staff in areas where they have less experience** may be needed. Many Local Source Control Specialists were experienced with hazardous waste, and some needed supplemental cross-training on stormwater and air emissions. When asked about lessons learned to apply to future programs, nearly a fifth (18%) of project team members surveyed recommended providing industry-specific information and training.
- **Coordinating closely with other agencies addressing similar issues** can increase business participation, streamline outreach and messages, and reduce overall costs and time investments. Businesses interviewed preferred a multimedia program and mentioned time as a challenge. About a quarter of project team members surveyed suggested improving coordination with other programs, such as local air agencies and USEPA. A simple, clear process for conducting outreach and quickly responding to businesses is key, especially in a multi-agency, multi-jurisdiction program. Additional training may be necessary to help prepare outreach staff to respond to common issues outside their primary areas of expertise, such as basic air quality training for hazardous waste staff.
- Businesses have an interest in and need for technical assistance to help with compliance and adoption of best management practices. **Making enough trained staff available to provide assistance** may be resource-intensive but can increase the program’s impact.
- Obtaining a reliable list of specific businesses was a challenge: the project team used several lists of businesses in an effort to identify all auto body shops, while refining lists to remove invalid entries. Where available, **lists of businesses registered with the Department of Labor and Industries** appeared to be the most reliable but may be incomplete. Similar projects may benefit from **soliciting lists from local outreach partners and other state agencies**, being flexible on the sites to visit, and conducting drive-by observations to identify additional businesses.
- Ecology management’s regular **review of project progress and active solicitation of input** from local partners and businesses would support early identification of issues and effective implementation.

Incentives

- Many self-certified businesses interviewed reported that the opportunities to **satisfy U.S. Environmental Protection Agency air requirements** and to **become EnviroStars-certified** motivated them to self-certify, though ultimately few businesses became EnviroStars through the ERP pilot.
- Most businesses interviewed said **financial assistance (particularly equipment vouchers and tax breaks), public recognition, and reduced inspections would motivate them** to participate.

Conclusions and Next Steps

The Environmental Results Program Auto Body Pilot Project achieved its intended goals in some areas, though it fell short of expectations elsewhere. Overall, it served its purpose as a pilot project in testing a new approach to achieving environmental results in a targeted sector, though actual results were mixed.

Ecology does not intend to continue the ERP Auto Body Pilot Project as a permanent program, but some elements of the ERP model may be useful in future programs. Ecology experienced difficulties implementing a voluntary Environmental Results Program that was based on the mandatory approach developed in Massachusetts. Going forward, however, valuable lessons learned from the pilot ERP can be incorporated into strengthening other current efforts and developing future programs involving outreach, assistance, compliance, and adoption of best practices, particularly in targeted sectors.

This report's appendices provide additional information on the methodology and results of this evaluation of Washington State's ERP Auto Body Pilot Project conducted in 2008–2010.

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Appendix A. Evaluation Methodology

Cascadia Consulting Group’s methodology encompassed three steps, described below, to accomplish the Department of Ecology’s goals for evaluating its Environmental Results Program (ERP) Auto Body Pilot Project, conducted in 2008–2010:

1. Design Evaluation Methodology.
2. Collect Data, Perform Interviews, and Conduct Other Research.
3. Analyze Data from Business Outreach.

1. Design Evaluation Methodology

At the start of the project, Cascadia met with core members of the Ecology project team, plus the EnviroStars lead, to confirm and clarify desired project outcomes and the key topics that would form the focus of the evaluation. Ecology and Cascadia jointly identified the Ecology staff members, participating local governments, and EnviroStars representatives to involve in the evaluation. Based on these discussions and background information provided by Ecology, Cascadia prepared a draft methodology, interview guides, and survey instruments. Cascadia obtained input on these materials from the project team and then finalized the evaluation methodology, interview guides, and survey instruments.

2. Collect Data, Perform Interviews, and Other Research

Identify and review existing data

Cascadia obtained from Ecology regarding the Auto Body Pilot Project’s existing data, analysis, and reporting. Relevant documents pertained to project strategies and activities, outputs and performance metrics, and stakeholders. Ecology also provided lists of businesses and their contact information to facilitate phone interviews. Additionally, Ecology categorized the businesses into categories according to their levels of involvement with the pilot.

Develop survey instrument and identify targeted survey population

From the list of stakeholders, Cascadia worked with Ecology to identify the targeted survey populations of businesses that participated in the program (through site visits, self-certification, or both); businesses received mailings only and otherwise declined to participate; paint vendors and auto body industry associations; and Local Source Control Specialists, EnviroStars leads, U.S. Environmental Protection Agency, and Department of Ecology program staff members.

Cascadia drafted four instruments for conducting interviews and surveys. The interview guides and survey addressed satisfaction levels with the overall program and its key components, challenges and barriers to participation, motivations and incentives to participate, benefits that participating businesses experienced, successful program elements, opportunities for improvement and lessons learned, and comments and suggestions for similar programs in the future. The survey instruments are presented in Appendix E.

Table 3 presents the number of responses completed for each interview group. The survey and interviews were primarily intended to gather in-depth, qualitative information from project participants, not quantitative information; accordingly, due to the small number of business participants interviewed, margins of error at the 90 percent confidence level for these populations range from approximately 17 to 22 percent.

Table 3. Interviews and Surveys Completed, by Category

Group	Responses	Approach
Businesses	47	
Program participants—completed self-certification	18	Phone interview
Program participants—site visit only (not self-certified)	15	Phone interview
Businesses that declined to participate (mailings only)	14	Phone interview
Other Stakeholders	2	
Board members of auto body business associations	1	Phone interview
Paint vendors	1	Phone interview
ERP Pilot Project Team	34	
Local Source Control Specialists	21	Web-based survey
EnviroStars leads	3	Web-based survey
Ecology team members	9	Web-based survey
USEPA Air team members	1	Web-based survey

Conduct interviews/surveys with businesses and outreach staff

Cascadia gathered information from auto body businesses, project team members, and other stakeholders through key informant interviews and web-based surveys. Using **phone interviews**, we contacted a randomly selected sample of participating and non-participating businesses. We also interviewed representatives of auto body industry associations and paint vendors that sell to auto body businesses.

At the start of surveying, Cascadia pre-tested the survey instrument for **businesses** with a small initial sample to ensure that it worked well, was easily understood, and obtained the results needed for analysis. After clarifying a definition of regulatory flexibility with Ecology, Cascadia conducted the remaining phone interviews with the targeted businesses in the participating jurisdictions. Cascadia made at least three attempts to reach each valid contact. Cascadia also conducted similar phone interviews with board members of **industry associations** and **auto body paint vendors**.

The interviewers obtained primarily qualitative information from businesses regarding their experience with the Environmental Results Program or their reasons for non-participation as well as their response

to potential incentives. Cascadia prepared brief written summaries to document and summarize the completed interviews with businesses in each group, presented in Appendix C.

Cascadia also conducted a web-based survey of **project team members**—including Local Source Control Specialists, EnviroStars leads, Ecology team members, and USEPA’s Air team—to assess the program, lessons learned, and best practices. Appendix D includes summary results from the surveys with members of the project team.

3. Analyze Data from Business Outreach

Cascadia worked with Ecology staff members to incorporate the Department’s analysis of existing data from baseline and follow-up visits regarding businesses contacted, site visits, performance metrics, and other information. Cascadia summarized the results of the interviews conducted with businesses and surveys of the project team to present key findings and identify lessons relevant for planning future business outreach efforts.

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Appendix B. Business Performance Metrics

Project Activities, Outputs, and Costs

Participation

The Environmental Results Program (ERP) Auto Body Pilot Project used a combination of lists from state agencies, local agencies, and private-sector sources to identify approximately 831 auto body shops in the target audience. Over the course of the project, some businesses were inadvertently removed from the list (62) and some businesses were found to be closed or otherwise ineligible for the project (260). During the pilot, field staff made many updates to improve the business database list.

The program mailed informational materials to 509 auto body shops, of which slightly more than half (268, or 53%) actively participated through the self-certification process, site visits, or both. Approximately a third of participating businesses (95) completed the self-certification process. Figure 7 depicts the project participants by category. Table 4 presents the progression of business participation from the initial list of targeted businesses to the total number of site visits conducted and self-certification forms received. Table 5 shows businesses according to site visit and self-certification status.

Local Source Control specialists (some of whom were also EnviroStars leads) completed 280 baseline and verification inspections at randomly selected businesses. Ecology staff members completed an additional 16 visits, for a total of 296 baseline and verification visits. Some businesses were visited more than once, and some also conducted a self-certification.

Approximately 52 businesses had some interest in EnviroStars: 25 were EnviroStars businesses before the project, 7 became new EnviroStars businesses, and the remainder submitted applications but did not become EnviroStars.

Figure 7. Project Participation Levels

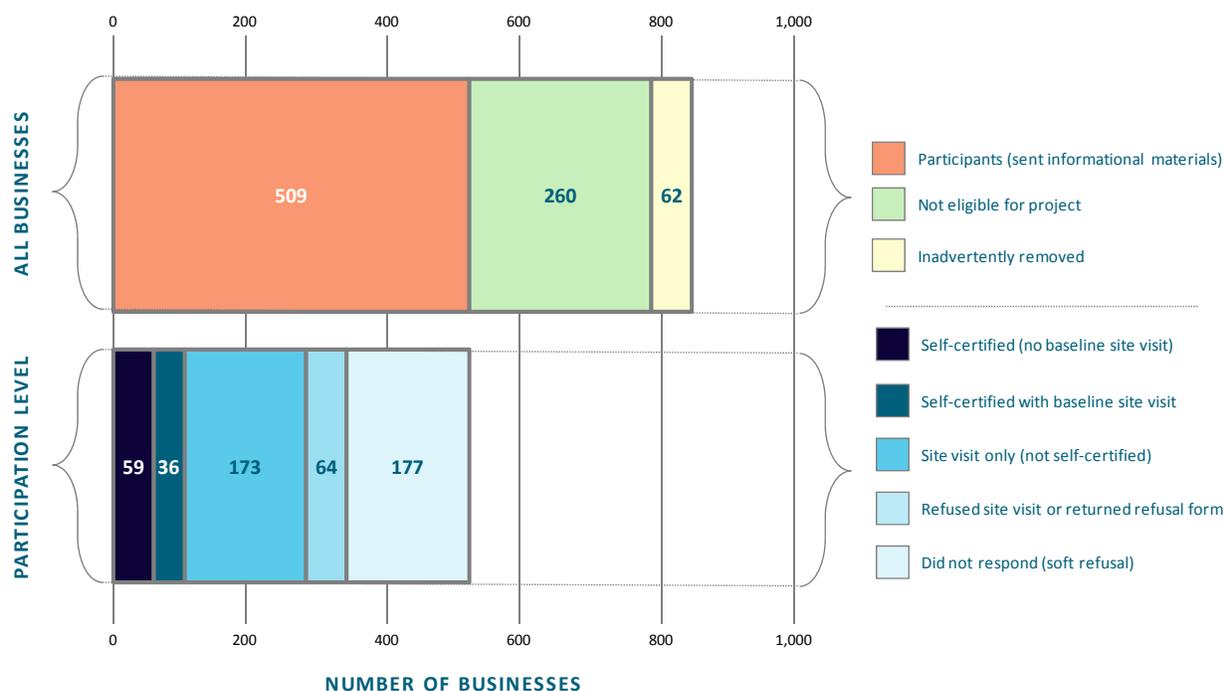


Table 4. Business Population

Count of Businesses (estimated)	
Initial business list	831
Inadvertently removed	62
Shortened business list	769
Closed	61
Not found	53
No auto body work	129
Residences	17
Businesses that received mailings	509
Actively refused to participate	64
Did not respond to mailing	177
Received visit and/or completed self-certification form*	268
Total Baseline Visits	154
Total Self-Certified Businesses	95
Total Verification Visits	142

* The sum of total visits and self-certified business is greater than the total number of actively participating businesses because some businesses received multiple site visits and/or received a site visit and completed a self-certification form. See Table 5 for more details.

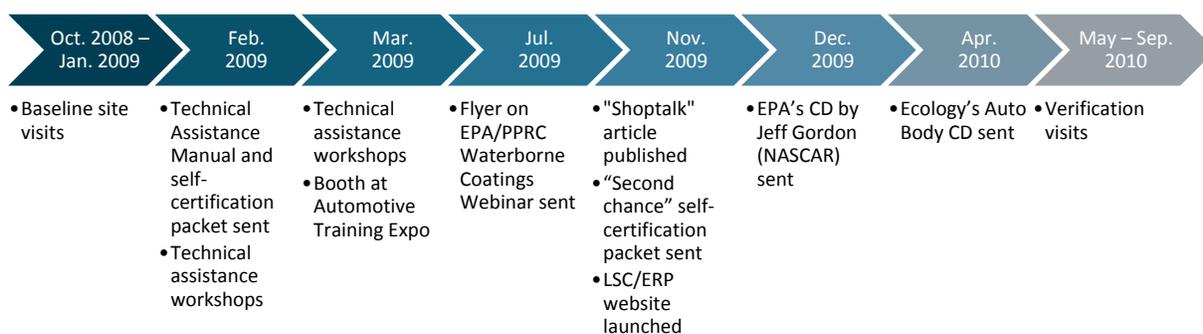
Table 5. Businesses Contacted, by Participation Level

	No site visit	Baseline visit only	Verification visit only	Baseline and verification visits	Total
Self-certified	39	19	20	17	95
Not self-certified	241	73	60	40	414
Total	280	92	80	57	509

The program held several free workshops, which were attended by a small number of businesses. Additional workshops that had been scheduled were canceled due to the low attendance at the initial workshops.

Project Promotion

The program was promoted through printed and electronic information, workshops, attendance at industry meetings, and site visits, as shown below.



Date	Promotional Activities
February 2009	<ul style="list-style-type: none"> ▪ Mailed Technical Assistance Manual and self-certification packet to businesses ▪ Held technical assistance workshops
March 2009	<ul style="list-style-type: none"> ▪ Held technical assistance workshops ▪ Staffed a booth at the Automotive Training Expo
July 2009	<ul style="list-style-type: none"> ▪ Mailed the flyer on EPA/PPRC Waterborne Coatings Webinar to businesses
November 2009	<ul style="list-style-type: none"> ▪ Published article in “Shoptalk” ▪ Mailed another self-certification packet, giving businesses a second chance to participate ▪ Launched Local Source Control and Environmental Results Program website
December 2009	<ul style="list-style-type: none"> ▪ Mailed EPA’s CD by Jeff Gordon (NASCAR) to businesses
April 2010	<ul style="list-style-type: none"> ▪ Mailed Ecology’s Auto Body CD to businesses

Project Funding and Costs

Funding Sources	Estimated Cost
USEPA Grant	\$200,000
Department of Ecology	\$192,000
Local Source Control Program	\$295,000
Total	\$687,000

Expenditure Categories	Estimated Cost
Local Source Control Specialists and EnviroStars	\$295,000
<ul style="list-style-type: none"> ▪ Site visits and technical assistance ▪ Trainings 	
Ecology Staff	\$276,000
<ul style="list-style-type: none"> ▪ Project management ▪ Technical Assistance Manual development ▪ Database design and data entry 	
Printing and mailing Technical Assistance Manual	\$12,000
Other direct expenses	\$11,000
Indirect expenses	\$93,000
Total	\$687,000

Implementation Rates of Checklist Measures

Ecology analyzed responses to questions on checklist forms completed during site visits and the self-certification process. Ecology used these data to calculate the average implementation rate for each measure from baseline visits, verification visits, and self-certification. Except where noted, the implementation rate measures the percentage of respondents who answered in the affirmative. (In some cases, respondents for which the question was not applicable were also considered to have implemented the measure; for example, respondents that do not need to use a manifest for dangerous waste were also counted as taking the proper action. Table 9, at the end of this section, presents details on how responses were categorized and well as other detailed information for each question.

Checklist items were also categorized by the following characteristics:

- **Environmental area**—categories were based on those used in the verification form and include dangerous waste, air quality, water quality, source control, and management and recordkeeping.
- **Regulatory status**—some items require compliance while others are considered best management practices (BMPs).
- **EnviroStars requirement**—to earn EnviroStars status, project participants were required to implement these items. *In general, these questions are combined with BMPs for analysis purposes.*
- **Environmental Business Practice Indicators**—Developed as part of [NEWMOA's Common Measures Project](#), EBPIs form a set of statistics to support comparing environmental performance across states.

This section presents tables and charts from this analysis organized into the following subsections:

- Significant Change in Implementation Rate, by Checklist Item
- Overall Change in Average Implementation, by Business
- Performance at Baseline and Verification for Ecology's Key Measures
- Performance at Baseline and Verification for Environmental Business Practice Indicators (EBPI)
- Performance at Baseline, Self-Certification, and Verification for All Checklist Items

Significant Change in Implementation Rate, by Checklist Item

Ecology analyzed data from baseline and verification visits to estimate changes in implementation rates between baseline and verification visits, presented in Table 6.² Ecology staff members suspect that some results may be due to data collection issues such as inconsistent question wording or explanations (particularly on the proper disposal of items and sewer- or drainage-related questions). Given the cost of purchasing equipment that captures 98% of overspray, Ecology staff members expressed surprise that businesses would increase their implementation of that checklist item between the baseline and verification visits.

² These changes have not yet been tested for statistical significance.

Table 6. Measured Implementation Rate Changes—Significant and Outside the Margin of Error

Checklist Question Text	Baseline	Verification	Change* (pct. pts.)
Dangerous Waste			
Are all hazardous waste containers properly labeled?	56%	70%	+15%
Are all hazardous waste containers properly labeled with the risk hazard of the chemical (i.e., toxic, flammable, etc.)?	62%	74%	+11%
Is mercury-containing equipment (fluorescent/HID lamps, thermostats, batteries, and auto switches) handled as dangerous waste or recycled as universal waste?	74%	85%	+11%
Does the facility have an employee program that teaches employees proper hazardous waste management procedures?	69%	79%	+10%
Are waste containers closed except when materials are being added or removed?	69%	79%	+10%
Does the hazardous waste accumulation area have secondary containment for spills and leaks?	57%	67%	+10%
Air Quality			
Is a log kept in the O&M manual documenting periodic inspections of shop equipment, repairing of defects, and training and assigning people to carry out the plan?	35%	68%	+32%
If the facility uses a spray booth or prep station, is it fitted with a type of filter technology or system that has been demonstrated to achieve at least 98 percent capture of paint overspray (this would include polyester fiber or fiberglass filters)? [†]	51%	72%	+21%
If the facility has high transfer efficiency painting training in place, is the training documented?	59%	74%	+16%
Does the facility have documentation of the amount of coatings used that contain chromium, lead, cadmium, nickel, and manganese (especially hexavalent chromium, most common in corrosion control undercoats and red, orange, and yellow paint colors) and the metals content of these coatings?	32%	46%	+14%
Does the facility use ventilated sander (dustless vacuum) equipment that captures paint dust and body filler, or an overhead capture system?	22%	33%	+11%

Checklist Question Text	Baseline	Verification	Change* (pct. pts.)
Management and Recordkeeping			
Is there any indication of spills in or near the shop? (Percentage represents responses of “no.”)	91%	82%	-9%
Does the facility work with vendors/jobbers to find less hazardous products (such as water-based or other low VOC coatings)? [†]	86%	73%	-13%
Water Quality			
Is all outside waste under cover and not in direct contact with soil?	39%	76%	+37%
Source Control			

Measured implementation rates did not change significantly for any Source Control items.

* Numbers may not sum exactly to totals due to rounding.

[†] Ecology staff members expressed doubts about the validity of these results, particularly regarding the number of businesses purchasing an expensive, new spray booth system in the current economy and regarding the decrease in facilities working to find less hazardous products. In addition, practices related to proper recycling of dangerous wastes and to wastewater or stormwater discharge that appear to have changed significantly are not presented in this table because Ecology reports that changes in the explanation or wording of questions make the results unreliable. Table 9 presents the complete data for all checklist items.

Overall Change in Average Implementation, by Business

Ecology’s analysis categorized individual *businesses* by their overall implementation rate for compliance items: a business that implemented 80% or more of compliance items was considered to have a high compliance rate for that environmental area. Figure 8 presents the percentage of businesses with measured high compliance rates by environmental area and overall.

Figure 8. Percentage of Businesses with High Implementation Rates, by Environmental Area

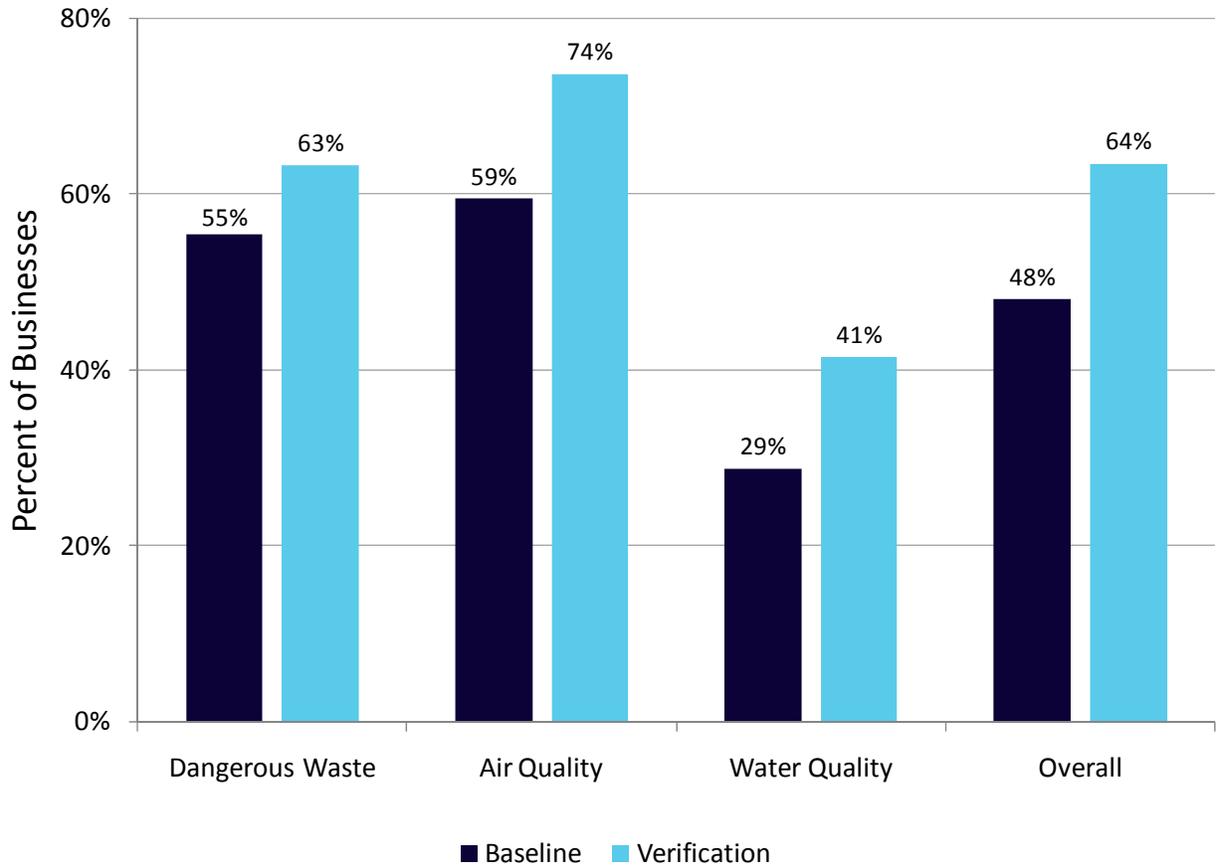


Figure 9. Percentage of Businesses at Overall Compliance Rates

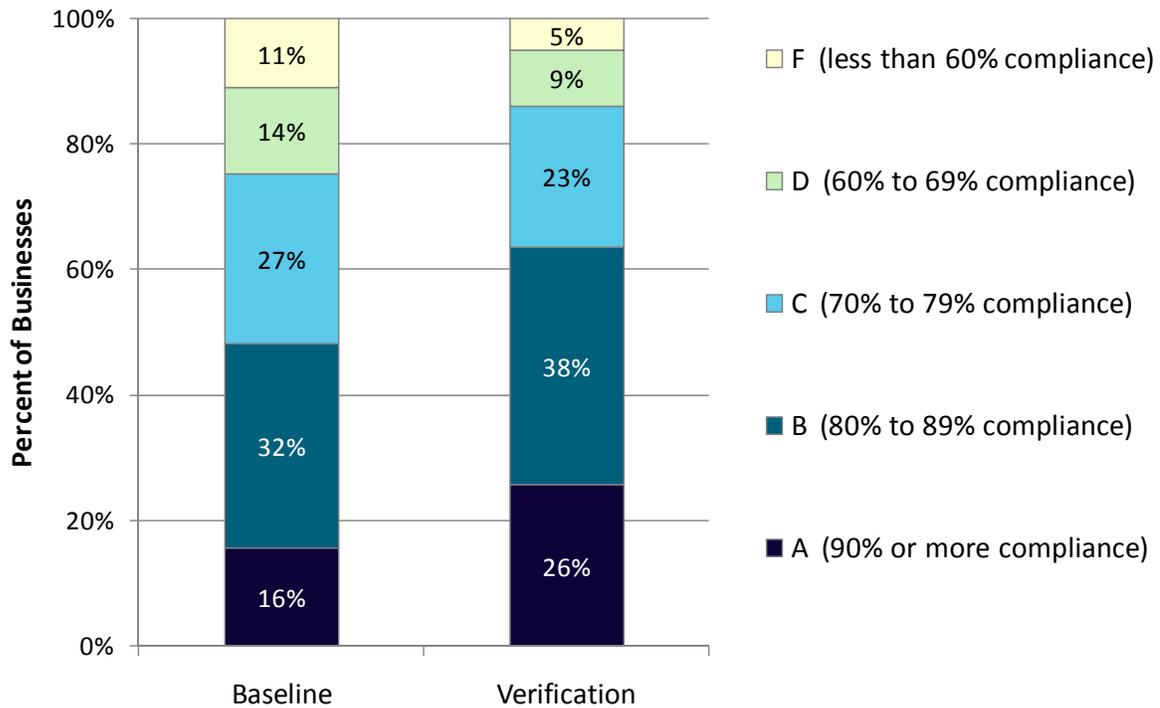


Table 7 presents the same information as Figure 9 in tabular format: the percentage of businesses that implemented compliance items at various compliance rates.

Table 7. Percentage of Businesses Meeting Specific Compliance Rates (All Compliance Items)

Compliance Rate	Baseline	Verification
A (90% or more compliance)	16%	26%
B (80% to 89% compliance)	32%	38%
C (70% to 79% compliance)	27%	23%
D (60% to 69% compliance)	14%	9%
F (less than 60% compliance)	11%	5%

Performance at Baseline and Verification for Ecology’s Key Measures

Figure 10 and Table 8 in this section present implementation rates for 10 key checklist items that Ecology identified. Poor performance on these measures often indicates broader environmental compliance problems at the businesses.

Figure 10. Implementation Rates for Ecology’s 10 Key Checklist Items

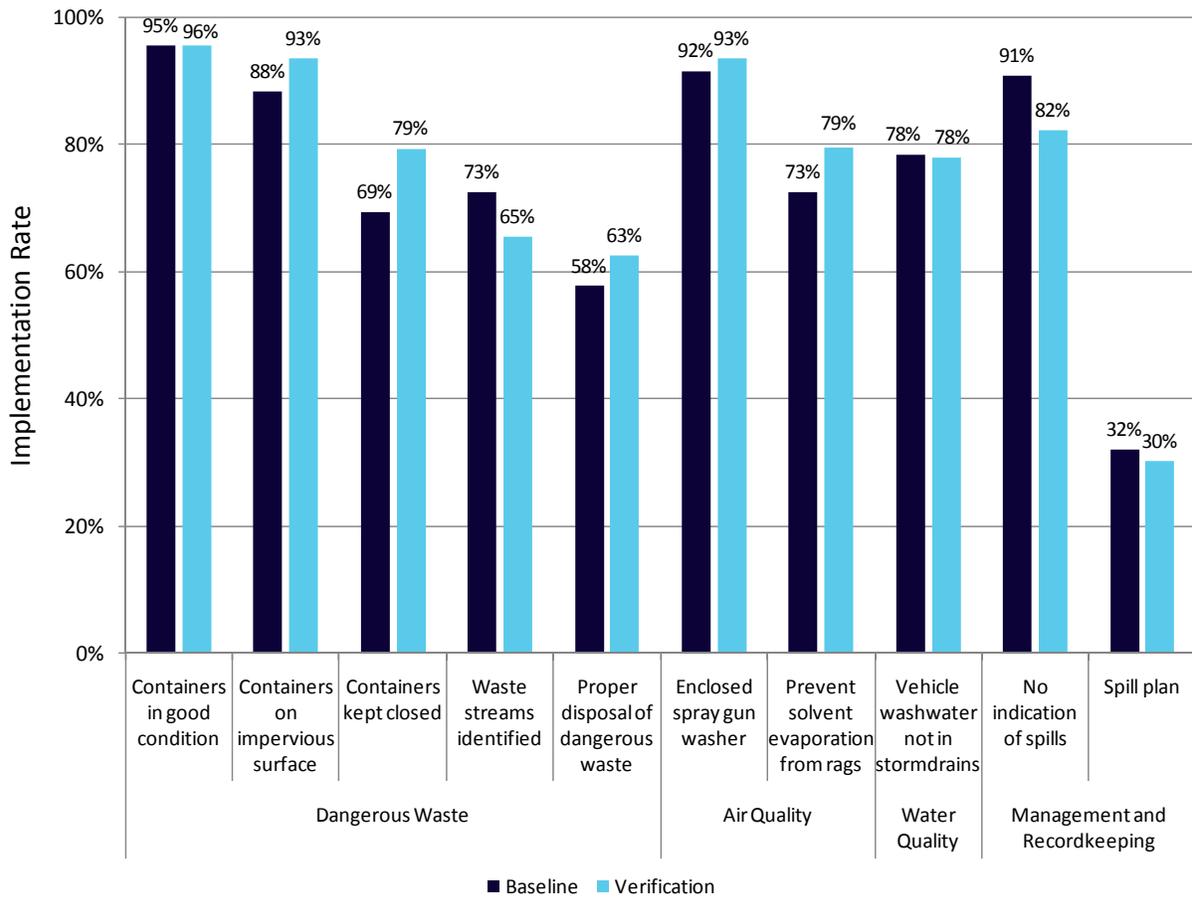


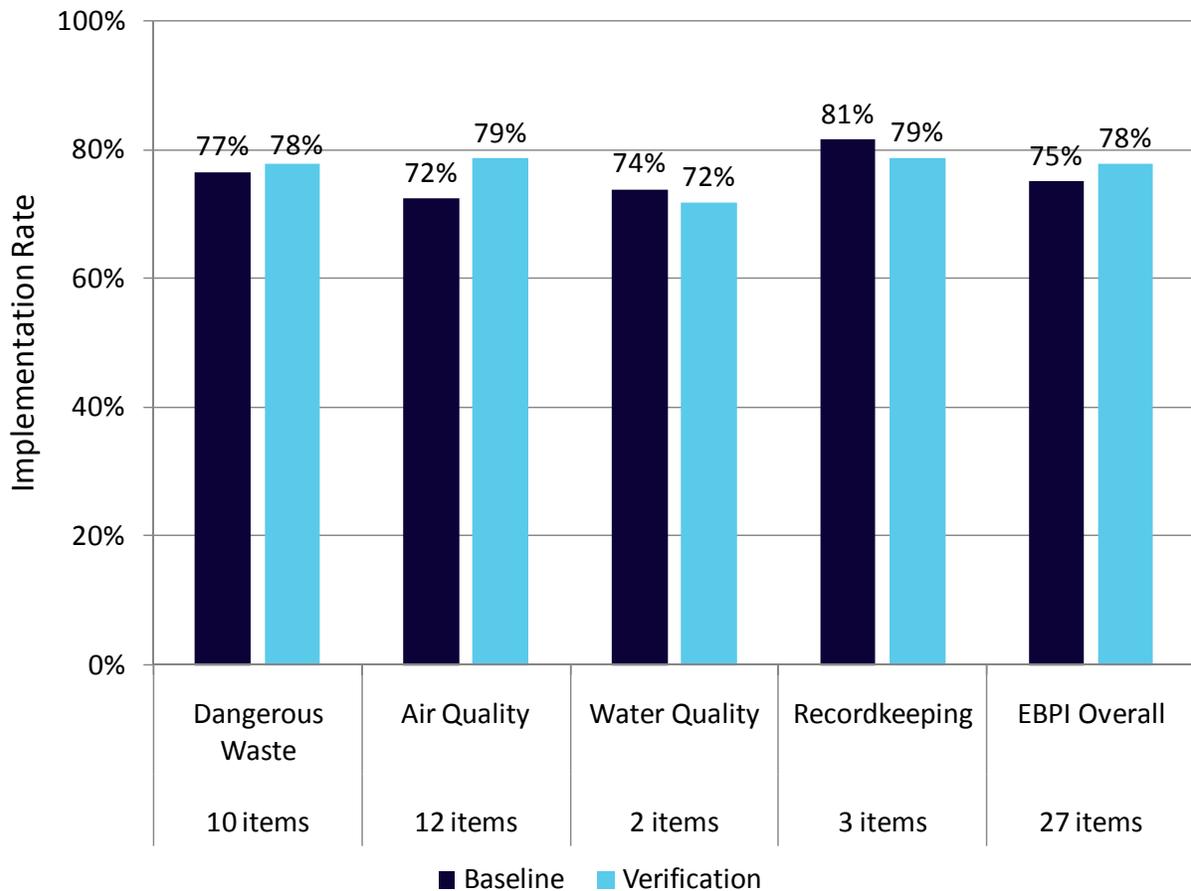
Table 8. Implementation Rates for Ecology’s 10 Key Checklist Items

Checklist Item	Baseline	Verification
Dangerous Waste		
Are all hazardous waste containers in good condition (i.e., free of severe rusting or apparent structural defects and not leaking)?	95%	96%
Are all hazardous waste containers stored on a crack-free, impervious surface that will contain leaks or spills?	88%	93%
Are waste containers closed except when materials are being added or removed?	69%	79%
Has the facility identified all of its hazardous waste streams?	73%	65%
Has the facility implemented proper disposal actions for all dangerous wastes?	58%	63%
Air Quality		
Are all paint spray guns cleaned with a fully enclosed spray gun washer or in a manner that avoids creating an atomized mist or spray of gun cleaning solvent?	92%	93%
Are disposable rags handled, stored, and disposed of in a manner that prevents the evaporation of solvents?	73%	79%
Water Quality		
Does any vehicle washwater enter into storm drains? (Percentage represents responses of “no.”)	78%	78%
Source Control		
<i>No performance measures were considered key measures.</i>		
Management and Recordkeeping		
Is there any indication of spills in or near the shop? (Percentage represents responses of “no.”)	91%	82%
Do you have a spill plan for your facility?	32%	30%

Performance at Baseline and Verification for Environmental Business Practice Indicators (EBPI)

Ecology identified a larger set of checklist items as Environmental Business Practice Indicators. Figure 11 presents implementation rates for these EBPI items. These measures form a common set of statistics that enable comparison of environmental performance across states.

Figure 11. Category Average Implementation Rates for EBPI Items

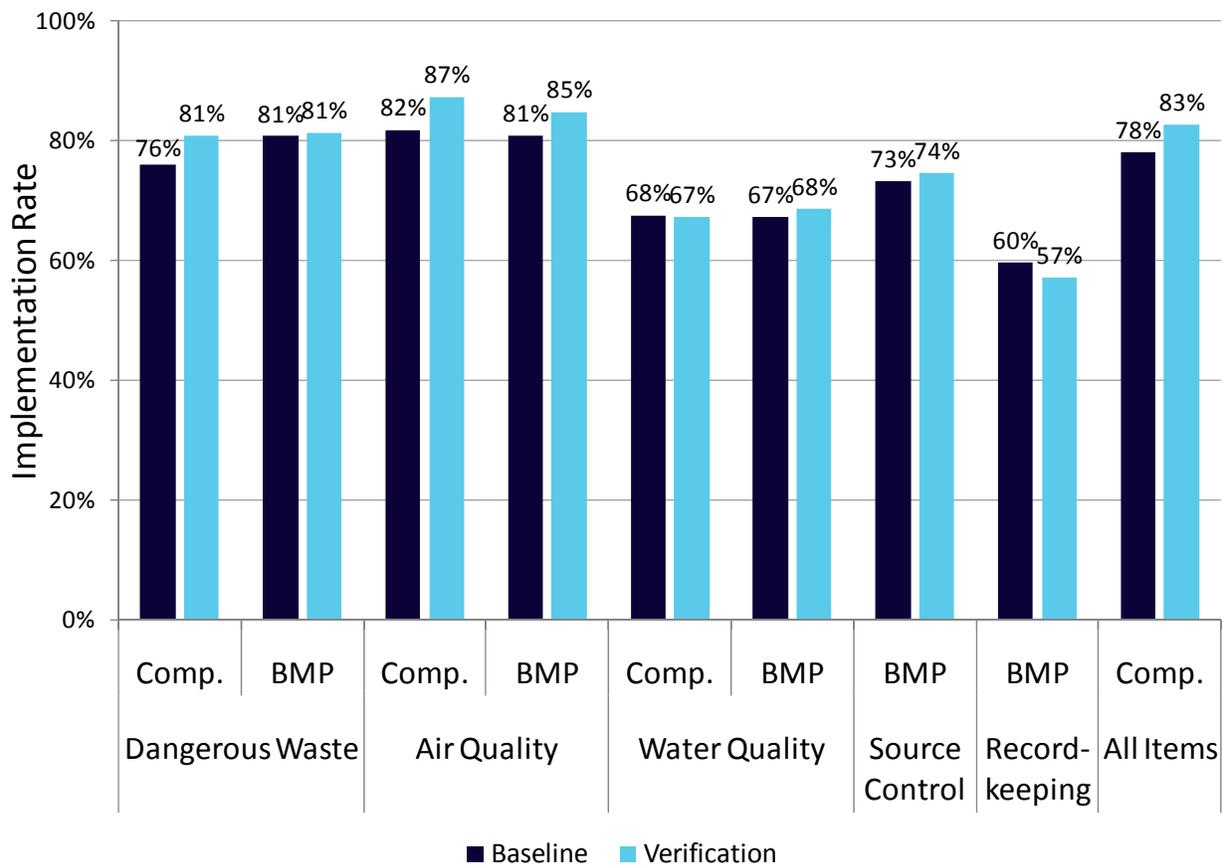


Note: Category averages were calculated by taking the average of implementation rates for all EBPI items in each category; no items in the recordkeeping category were considered EBPIs.

Performance at Baseline, Self-Certification, and Verification for All Checklist Items

Figure 12 presents implementation rates by environmental area (such as dangerous waste or air quality) and regulatory status (compliance issue or BMP). Average implementation rates were calculated as the averages across all checklist items and all businesses. For example, suppose the sample had contained only two businesses, one that implemented all dangerous waste compliance items (100% implementation) and another that implemented only half of those items (50% implementation); in this example, the average implementation rate for dangerous waste compliance items would be 75 percent.

Figure 12. Category Average Implementation Rates for Compliance Items and Best Management Practices



Notes: Category averages were calculated by taking the average of implementation rates for all items in each category. No items in the source control or recordkeeping categories required compliance. BMPs include EnviroStars checklist items.

The following table presents complete environmental performance results from Ecology’s analysis including:

- **Question number and text** on checklist forms. Please note that questions were added, removed, and reorganized between the baseline and verification visits. The table includes the question numbers from both versions of the checklist.
- How responses were categorized as **implemented** or **not implemented**. DK means don’t know, NA means not applicable; NAG means no answer given; R means refused to answer.
- Implementation rates observed at **baseline** and **verification**, along with the calculated **change** (in rounded percentage points). Ecology’s analysis identified changes (bold font) as significant and outside the margin of error. According to Ecology, however, results for questions about proper disposal or recycling and about sewers may not be valid due to changes in question wording or explanation.
- Implementation rates reported on **self-certification** forms.
- **Notes** on which questions were considered compliance items (C), required for EnviroStars certification (★), or were identified by the Department of Ecology as Environmental Business Practice Indicators (EBPI).

Table 9. All Checklist Items, with Number, Text, Response Categorization, and Implementation Rates

Question Number (baseline verification) and Text		Implemented	Not Implemented	Baseline	Verification	Change	Self-certification	Notes
Dangerous Waste								
1 1	What is the facility’s hazardous waste generator status under Washington State’s classification system?	SQG	MQG, LQG, NAG	98%	94%	-4%	97%	EBPI
7 2	Is mercury-containing equipment (fluorescent/HID lamps, thermostats, batteries, and auto switches) handled as dangerous waste or recycled as universal waste?	Yes or NA	No, DK, NAG	74%	85%	+11%	88%	C
8 3	Are employees made aware that mercury-containing items must be handled appropriately?	Yes or NA	No, DK, NAG	76%	83%	+7%	94%	★
11 4	If a manifest is not required, does the facility document its hazardous waste shipments, e.g., Bill of Lading or other documentation?	Yes or NA	No, DK, NAG	86%	90%	+3%	83%	C EBPI
12 5	Does the facility have an employee program that teaches employees proper hazardous waste management procedures?	Yes or NA	No, DK, NAG	69%	79%	+10%	83%	★ EBPI
13 6	Is the waste accumulation area inspected weekly for signs of spills or container deterioration?	Yes	No, NA, DK, NAG	84%	79%	-4%	93%	
14 7	Is the weekly inspection documented with written records (log)?	Yes	No, NA, DK, NAG	10%	18%	+8%	31%	
5 8	Are waste solvents recycled on-site?	Yes	No, NA, DK, NAG	37%	42%	+5%	47%	
6 9	If waste solvents are recycled on-site, is the recycling documented with a still log?	Yes or NA	No, DK, NAG	75%	78%	+3%	92%	C
15 10	Are specific employees assigned the responsibility of labeling containers and for proper waste collection, storage, and disposal?	Yes or NA	No, DK, NAG	76%	77%	+1%	74%	★
16 11	Are waste containers closed except when materials are being added or removed?	Yes	No, NA, DK, NAG	69%	79%	+10%	97%	C EBPI
17 12	Are all hazardous waste containers properly labeled?	Yes	No, NA, DK, NAG	56%	70%	+15%	90%	C EBPI
18 13	Are all hazardous waste containers properly labeled with the risk hazard of the chemical (i.e., toxic, flammable, etc.)?	Yes	No, NA, DK, NAG	62%	74%	+11%	92%	C
19 14	Are all hazardous waste containers in good condition (i.e., free of severe rusting or apparent structural defects and not leaking)?	Yes	No, NA, DK, NAG	95%	96%	+0%	97%	C EBPI
20 15	Does the hazardous waste accumulation area have secondary containment for spills and leaks?	Yes	No, NA, DK, NAG	57%	67%	+10%	91%	
21 16	Are all hazardous waste containers stored on a crack-free, impervious surface that will contain leaks or spills?	Yes	No, NA, DK, NAG	88%	93%	+5%	95%	C

Question Number (baseline verification) and Text	Implemented	Not Implemented	Baseline	Verification	Change	Self-certification	Notes
22 17 Does the facility exceed the state’s accumulation limits for dangerous waste for this category of generator? (Percentage represents responses of “no.”)	No	Yes, NA, DK, NAG	99%	96%	-3%	98%	C EBPI
27b 18a Has the facility implemented proper recycling actions for all dangerous waste? (specifically auto batteries)	Recycle or NA	Dispose, DK, NAG	99%	99%	-0%	98%	★
27a 18b Has the facility implemented proper recycling actions for all dangerous waste? (specifically other batteries)	Recycle or NA	Dispose, DK, NAG	77%	88%	+12%	84%	★
27c 18c Has the facility implemented proper recycling actions for all dangerous waste? (specifically oil filters)	Recycle or NA	Dispose, DK, NAG	89%	95%	+6%	83%	★
27d 18d Has the facility implemented proper recycling actions for all dangerous waste? (specifically antifreeze)	Recycle or NA	Dispose, DK, NAG	95%	97%	+2%	95%	★
27e 18e Has the facility implemented proper recycling actions for all dangerous waste? (specifically fluorescent tubes)	Recycle or NA	Dispose, DK, NAG	70%	86%	+16%	70%	★
27f 18f Has the facility implemented proper recycling actions for all dangerous waste? (specifically hydraulic fluids)	Recycle or NA	Dispose, DK, NAG	97%	99%	+3%	94%	★
27g 18g Has the facility implemented proper recycling actions for all dangerous waste? (specifically transmission fluids)	Recycle or NA	Dispose, DK, NAG	97%	99%	+1%	93%	★
27h 18h Has the facility implemented proper recycling actions for all dangerous waste? (specifically greases)	Recycle or NA	Dispose, DK, NAG	95%	97%	+2%	88%	★
NA 18i Has the facility implemented proper recycling actions for all dangerous waste? (specifically booth filters)	Recycle or NA	Dispose, DK, NAG	NA	65%	NA	NA	
27i 18j Has the facility implemented proper recycling actions for all dangerous waste? (specifically used towels)	Recycle or NA	Dispose, DK, NAG	69%	87%	+18%	78%	★
27j 18k Has the facility implemented proper recycling actions for all dangerous waste? (specifically aerosol cans)	Recycle or NA	Dispose, DK, NAG	12%	89%	+77%	22%	★
27k 18l Has the facility implemented proper recycling actions for all dangerous waste? (specifically solvents)	Recycle or NA	Dispose, DK, NAG	79%	96%	+17%	90%	★
27l 18m Has the facility implemented proper recycling actions for all dangerous waste? (specifically paint)	Recycle or NA	Dispose, DK, NAG	82%	93%	+11%	81%	★
27m 18n Has the facility implemented proper recycling actions for all dangerous waste? (specifically paint thinner)	Recycle or NA	Dispose, DK, NAG	79%	94%	+15%	88%	★

Question Number (baseline verification) and Text	Implemented	Not Implemented	Baseline	Verification	Change	Self-certification	Notes	
27n 18o	Has the facility implemented proper recycling actions for all dangerous waste? (specifically CFCs)	Recycle or NA	Dispose, DK, NAG	95%	94%	-1%	83%	★
27o 18p	Has the facility implemented proper recycling actions for all dangerous waste? (specifically brake fluid)	Recycle or NA	Dispose, DK, NAG	97%	93%	-4%	92%	★
27p 18q	Has the facility implemented proper recycling actions for all dangerous waste? (specifically used oil)	Recycle or NA	Dispose, DK, NAG	97%	95%	-3%	95%	★
NA 18r	Has the facility implemented proper recycling actions for all dangerous waste? (specifically still bottoms)	Recycle or NA	Dispose, DK, NAG	NA	92%	NA	NA	
2 19	Has the facility identified all of its hazardous waste streams?	Yes	No, NA, DK, NAG	73%	65%	-7%	87%	C EBPI
26 20	Has the facility implemented proper disposal actions for all dangerous wastes?	Yes	No, NA, DK, NAG	58%	63%	+5%	63%	C
28 21	Has the facility implemented proper recycling or disposal actions for all other wastes?	Yes	No, NA, DK, NAG	41%	52%	+10%	63%	★
28a 21a	Has the facility implemented proper recycling or disposal actions for all other wastes? (specifically paper)	Recycle or NA	Dispose, DK, NAG	40%	51%	+11%	51%	★
28b 21b	Has the facility implemented proper recycling or disposal actions for all other wastes? (specifically scrap metal)	Recycle or NA	Dispose, DK, NAG	98%	99%	+1%	98%	★
28e 21c	Has the facility implemented proper recycling or disposal actions for all other wastes? (specifically cardboard)	Recycle or NA	Dispose, DK, NAG	77%	87%	+10%	90%	★
28f 21d	Has the facility implemented proper recycling or disposal actions for all other wastes? (specifically bumpers)	Recycle or NA	Dispose, DK, NAG	60%	66%	+6%	71%	★
28h 21e	Has the facility implemented proper recycling or disposal actions for all other wastes? (specifically computers)	Recycle or NA	Dispose, DK, NAG	90%	96%	+6%	90%	★
28j 21f	Has the facility implemented proper recycling or disposal actions for all other wastes? (specifically glass)	Recycle or NA	Dispose, DK, NAG	63%	57%	-7%	46%	★
28j 21g	Has the facility implemented proper recycling or disposal actions for all other wastes? (specifically plastic)	Recycle or NA	Dispose, DK, NAG	46%	54%	+9%	54%	★
29 22	Has the facility taken one or more actions to conserve water in the past three years?	Yes	No, NA, DK, NAG	43%	38%	-6%	51%	★ EBPI
31 24	Has the facility taken one or more actions to conserve energy in the past three years?	Yes	No, NA, DK, NAG	77%	70%	-7%	78%	★ EBPI

Question Number (baseline verification) and Text	Implemented	Not Implemented	Baseline	Verification	Change	Self-certification	Notes	
Air Quality								
33 26	Are all spray-applied coatings applied using an HVLP spray gun or an equivalent high transfer efficiency technology?	Yes	No, NA, DK, NAG	98%	98%	-0%	97%	C EBPI
34 27	Are all paint spray guns cleaned with a fully enclosed spray gun washer or in a manner that avoids creating an atomized mist or spray of gun cleaning solvent?	Yes	No, NA, DK, NAG	92%	93%	+2%	96%	C EBPI
35 28	Does the facility have high transfer efficiency painting training in place?	Yes	No, NA, DK, NAG	81%	88%	+6%	72%	C EBPI
36 29	If the facility has high transfer efficiency painting training in place, is the training documented?	Yes	No, NA, DK, NAG	59%	74%	+16%	62%	C EBPI
37 30	Are all spray-applied coatings applied in an enclosed, ventilated spray booth or preparation station?	Yes	No, NA, DK, NAG	94%	97%	+4%	96%	C EBPI
38 31	If spray-applied coatings are applied in an enclosed, ventilated spray booth or preparation station, is the station fitted with particle filters on the exhaust?	Yes	No, NA, DK, NAG	91%	93%	+2%	92%	C EBPI
40 33	If the facility uses a spray booth or prep station, is it fitted with a type of filter technology or system that has been demonstrated to achieve at least 98 percent capture of paint overspray (this would include polyester fiber or fiberglass filters)?	Yes	No, NA, DK, NAG	51%	72%	+21%	82%	C EBPI
41 34	Does the facility have documentation of the amount of coatings used that contain chromium, lead, cadmium, nickel, and manganese (especially hexavalent chromium, most common in corrosion control undercoats and red, orange, and yellow paint colors) and the metals content of these coatings?	Yes	No, NA, DK, NAG	32%	46%	+14%	53%	C EBPI
44 37	Does the facility use paint strippers containing methylene chloride?	Yes or NA	No, DK, NAG	84%	81%	-3%	85%	EBPI
45 38	If the facility uses paint strippers containing methylene chloride, does it keep records to document annual usage?	Yes or NA	No, DK, NAG	88%	88%	-0%	99%	C EBPI
46 39	Is the annual usage of methylene chloride more than one ton per year?	No or NA	Yes, DK, NAG	98%	100%	+2%	100%	
47a 40	If the facility uses methylene chloride for paint stripping, is there a minimization plan?	Yes or NA	No, DK, NAG	95%	100%	+5%	98%	C
50 41	Does the facility have an operation and maintenance (O&M) manual for spray booths and other equipment (such as spray guns and gun cleaners)?	Yes	No, NA, DK, NAG	55%	48%	-7%	75%	

Question Number (baseline verification) and Text	Implemented	Not Implemented	Baseline	Verification	Change	Self-certification	Notes
51 42 Is a log kept in the O&M manual documenting periodic inspections of shop equipment, repairing of defects, and training and assigning people to carry out the plan?	Yes	No, NA, DK, NAG	35%	68%	+32%	57%	★
53 44 If yes, is all sandblasting performed inside a booth, hangar, or cabinet designed to capture the blast grit or overspray?	Yes or NA	No, DK, NAG	95%	98%	+2%	99%	C
55a 46a Is all outdoor sandblasting enclosed with tarps?	Yes or NA	No, DK, NAG	96%	97%	+1%	96%	C
55b 46b Is all outdoor sandblasting performed with either steel shot or an abrasive containing less than one percent blasting medium (by mass) which would pass through a No. 200 sieve?	Yes or NA	No, DK, NAG	96%	97%	+1%	96%	C
56 47 When sanding, are the shop doors kept closed to avoid releasing dust outdoors?	Yes	No, NA, DK, NAG	78%	81%	+3%	74%	C EBPI
57 48 Does the facility use ventilated sander (dustless vacuum) equipment that captures paint dust and body filler, or an overhead capture system?	Yes	No, NA, DK, NAG	22%	33%	+11%	34%	EBPI
59 49 Are disposable rags handled, stored, and disposed of in a manner that prevents the evaporation of solvents?	Yes	No, NA, DK, NAG	73%	79%	+7%	80%	
Recordkeeping							
62 50 Even if emergency procedures are not required, do you have emergency procedures in place?	Yes	No, NA, DK, NAG	64%	63%	-2%	77%	EBPI
63 51 Is there any indication of spills in or near the shop? (Percentage represents responses of “no.”)	No	Yes, NA, DK, NAG	91%	82%	-9%	94%	EBPI
64 52 Do you have a spill plan for your facility?	Yes	No, NA, DK, NAG	32%	30%	-2%	71%	
65 53 Are employees trained and aware of the spill plan?	Yes or NA	No, DK, NAG	32%	28%	-4%	71%	
66 54 Is the spill plan posted in a suitable location?	Yes or NA	No, DK, NAG	16%	24%	+7%	64%	
67 55 Are spill cleanup materials appropriate for the type and quantity of chemicals stored on-site?	Yes	No, NA, DK, NAG	91%	85%	-5%	86%	★
68 56 Are cleanup materials stored in a container clearly labeled “SPILL KIT”?	Yes	No, NA, DK, NAG	35%	38%	+3%	61%	
72 57 Does the facility have MSDS or formulation data supplied by manufacturer for all the solvents and coatings that they use?	Yes	No, NA, DK, NAG	90%	91%	+2%	94%	EBPI
74 58 Does the facility work with vendors/jobbers to find less hazardous products (such as water-based or other low VOC coatings)?	Yes	No, NA, DK, NAG	86%	73%	-13%	94%	★

Question Number (baseline verification) and Text	Implemented	Not Implemented	Baseline	Verification	Change	Self-certification	Notes	
Water Quality								
79 60	Have all the drains on-site been located and identified whether they discharge to sanitary, storm, or septic systems?	Yes	No, NA, DK, NAG	83%	76%	-7%	86%	C
85 61c	Does the facility discharge industrial wastewater to surface water?	No or NA	Yes, DK, NAG	82%	99%	+17%	91%	
94 62a	Are drains in the vehicle washing area directed to the sanitary sewer or a sump?	Yes or NA	No, DK, NAG	37%	9%	-29%	57%	
92 62b	Does any vehicle washwater enter into storm drains?	No or NA	Yes, DK, NAG	78%	78%	-1%	86%	
83 63	If the facility discharges industrial wastewater to the sanitary sewer, does the facility have approval from the local sewer authority?	Yes	No, NA, DK, NAG	31%	45%	+14%	25%	C
86 64	Does the facility have any unsealed floor drains?	No	Yes, NA, DK, NAG	60%	63%	+3%	76%	EBPI
87 65	If the facility has unsealed floor drains, is the facility in compliance with the state standard for discharges to unsealed floor drains?	Yes or NA	No, DK, NAG	88%	81%	-7%	97%	C EBPI
88 66	Are all products, including paints, thinners, strippers, cleaners, and automotive fluids, stored with secondary containment that would prevent leaks from entering a drain or leaving the building?	Yes or NA	No, DK, NAG	65%	68%	+4%	92%	
97 68	Are phosphate-free soaps and detergents used?	Yes or NA	No, DK, NAG	54%	59%	+5%	87%	★
101 69	Are water-treatment devices inspected and maintained?	Yes or NA	No, DK, NAG	80%	73%	-8%	91%	
102 70	Is water-treatment device maintenance recorded in a logbook?	Yes or NA	No, DK, NAG	73%	74%	+0%	76%	
105 71	Are vehicles checked as they come in for leaking fluids and drained or leaks contained with drip pans immediately?	Yes	No, NA, DK, NAG	93%	90%	-2%	88%	
106 72	Is there repair and maintenance of vehicles outside?	No	Yes, NA, DK, NAG	91%	93%	+3%	96%	
107 73	Are outdoor stockpiled/stored materials under cover?	Yes or NA	No, DK, NAG	43%	39%	-4%	77%	
108b 74	If not under cover, are storage areas protected from stormwater run-on/run-off (i.e., berms or other barriers installed)?	Yes or NA	No, DK, NAG	40%	52%	+12%	46%	
108a 75	Is all outside waste under cover and not in direct contact with soil?	Yes or NA	No, DK, NAG	39%	76%	+37%	70%	

Question Number (baseline verification) and Text		Implemented	Not Implemented	Baseline	Verification	Change	Self-certification	Notes
Source Control								
110 76	Are catch basins cleaned out and maintained on a regular schedule?	Yes or NA	No, DK, NAG	73%	79%	+5%	90%	
111 77	Is filter fabric and/or other run-off control device used to prevent dust, grit, or other pollutants from entering catch basins?	Yes or NA	No, DK, NAG	56%	58%	+2%	63%	
113 78	Is there evidence of contaminants in catch basins?	No or NA	Yes, DK, NAG	90%	87%	-3%	86%	

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Appendix C. Business Interview Results with Data Tables

Note: Responses should not be considered verbatim quotations. Responses from businesses were paraphrased by the phone interviewer.

Count of Respondents

Table 10. Interviews and Surveys Completed, by Category

Respondent Category	Respondents
Participants (self-certified)	18
Participants (site visit only)	15
Non-participant (received mailings only)	14
Auto body associations and paint vendors	2
Auto Body Businesses	49

Participants—Summary

Satisfaction and Suggestions

Table 11. Participants: How Learned About Pilot Project (Question 3)

Response	Count	Percent
Letter/mailing	20	61%
Inspector came to my shop for a site visit	13	39%
Industry association or vendors	5	15%
Website/internet	2	6%
Word-of-mouth	2	6%
Other (please specify)	7	21%
Total Respondents	33	NA

** Includes only responses that could not be placed into existing categories; surveyor recorded details for additional responses not considered “other.”*

Other Responses—How Self-Certified Participants Learned About Program (Question 3)

After EnviroStars program acceptance awarded.

Being involved in EnviroStars, going to a couple meetings in Bellevue.

Brought to attention from paint company.

Heard about the Pilot Program through Environmental Compliance and Remediation, Inc. (ECR), the compliance company. This is a local and national group.*

I followed the steps, but did not hear any feedback. I have not received any benefits yet.

Lake Washington meeting, Autobody Craftsman Association, e-mail.*

Notified, maybe snail-mail.*

Probably mail; started with a phone call, then a packet.

Spokane Air Quality presented it to us, word of mouth.

** Responses were categorized into existing response categories.*

Other Responses—How Participants Receiving Site Visits Only Learned About Program (Question 3)

An agency representative or inspector may have shown up. I don't quite remember. I do remember someone stopping by to talk about spill kits and believes that this was for the same program.*

An inspector stopped by and asked if they could come in.*

An inspector visited the shop and told me my shop was participating in this Pilot Program.*

Brit presented it.*

From EPA girl.*

From paint suppliers.*

Maybe from EPA or paint vendor company; multiple e-mails.*

Showed up on the doorstep; they came to me.*

Young lady did a questionnaire.*

** Responses were categorized into existing response categories.*

Table 12. Participant Satisfaction with Site Visits (Question 4a)

Response	Site Visit Only		Self-Certified		Total	
	Count	Percent	Count	Percent	Count	Percent
5 = very satisfied	3	20%	4	22%	7	21%
4	4	27%	4	22%	8	24%
3	7	47%	4	22%	11	33%
2	1	7%	1	6%	2	6%
1 = very dissatisfied	0	0%	1	6%	1	3%
Don't know/Not applicable	0	0%	4	22%	4	12%
Total Respondents	15	100%	18	100%	33	100%

Table 13. Participant Satisfaction with Self-certification Process (Question 4b)

Response	Site Visit Only		Self-Certified		Total	
	Count	Percent	Count	Percent	Count	Percent
5 = very satisfied	2	13%	4	22%	6	18%
4	5	33%	8	44%	13	39%
3	4	27%	5	28%	9	27%
2	3	20%	0	0%	3	9%
1 = very dissatisfied	0	0%	1	6%	1	3%
Don't know/Not applicable	1	7%	0	0%	1	3%
Total Respondents	15	100%	18	100%	33	100%

Table 14. Participant Satisfaction with Technical Assistance Materials (Question 4c)

Response	Site Visit Only		Self-Certified		Total	
	Count	Percent	Count	Percent	Count	Percent
5 = very satisfied	8	53%	5	28%	13	39%
4	4	27%	7	39%	11	33%
3	2	13%	3	17%	5	15%
2	1	7%	2	11%	3	9%
1 = very dissatisfied	0	0%	0	0%	0	0%
Don't know/Not applicable	0	0%	1	6%	1	3%
Total Respondents	15	100%	18	100%	33	100%

Table 15. Participant Satisfaction with Response Letters or E-mails Regarding Actions Needed (Question 4d)

Response	Site Visit Only		Self-Certified		Total	
	Count	Percent	Count	Percent	Count	Percent
5 = very satisfied	6	40%	5	28%	11	33%
4	3	20%	8	44%	11	33%
3	4	27%	2	11%	6	18%
2	0	0%	0	0%	0	0%
1 = very dissatisfied	1	7%	2	11%	3	9%
Don't know/Not applicable	1	7%	1	6%	2	6%
Total Respondents	15	100%	18	100%	33	100%

Table 16. Participant Challenges Experienced in Participating in the Pilot Project (Question 5)

Response	Count	Percent
No challenges	8	24%
Too complicated or confusing	7	21%
Mentioned specific change required	5	15%
Took too long	4	12%
Assistance was not helpful	3	9%
Inconvenient	3	9%
Cost	2	6%
Did not address our concerns	2	6%
Other challenges	9	27%
Total Respondents	33	NA

Table 17. Participant Benefits Experienced (Question 6)

Response	Count	Percent
Learned what we should be doing	14	42%
Did the right thing	9	27%
Came into compliance	6	18%
Run business better or more safely	6	18%
Moved beyond compliance	1	3%
Saved money	1	3%
Other (please specify)	6	18%
No benefits	10	30%
Total Respondents	33	NA

Table 18. Participant Preference for a Single Multimedia Program or Separate Programs (Question 7)

Response	Count	Percent
Single program	31	94%
Separate programs	1	3%
Don't know	1	3%
Total Respondents	33	100%

Table 19. Participant Recommendations for Improvement (Question 8)

Response Category	Count	Percent
Improve communication: more and clearer information	5	16%
Streamline or improve coordination	5	16%
Address non-compliant or illegal shops	5	16%
Other recommendations	8	26%
No changes or don't know	10	32%
Total Respondents	31	NA

Motivations, Incentives, and Benefits

Table 20. Self-certifying Participants: Motivated to Self-certify by Ability to Satisfy EPA Requirements (Question 9)

Response	Count	Percent
Motivated by ability to meet EPA requirements (Yes)	10	56%
Not motivated by ability to meet EPA requirements (No)	6	33%
Don't know	2	11%
Total Respondents	18	100%

Table 21. Self-certifying Participants: Motivated to Self-certify by Opportunity to Join EnviroStars (Question 10)

Response	Count	Percent
Motivated by opportunity to join EnviroStars (Yes)	8	44%
Not motivated by opportunity to join EnviroStars (No)	8	44%
Don't know	2	11%
Total Respondents	18	100%

Table 22. Participants: Incentives That Would Motivate Future Participation (Question 11)

Response	Count	Percent
On-site technical assistance	30	94%
Financial assistance	28	88%
Public recognition	28	88%
Regulatory flexibility	28	88%
Reduced inspections	25	78%
Other (please specify)	10	31%
Total Respondents	32	NA

Other Responses: Incentives That Would Motivate Participants (Question 11)

Big packet of questions = less incentive.

Fewer inspections.

Finances hinder the cleanliness.

Get rid of illegal/underground shops. Phone number of someone to talk to, a body to talk to.

Give a warning before fining you on something.

If a shop is totally in compliance, would be good to take a tour to learn how they reached compliance. Water and waste are a new ball game, new chapter. Not much more we can do for air quality, if already have the booth. New frontier in this industry is waste and water.

Letting customers know that shop is doing things correctly, personal touch.

Public awareness.

I know of a shop in Rainier Valley that is operating illegally, among many other auto body shops in the region. Someone should be working with those shops, too. No one is doing anything to fix it.

Streamlined process, one entity.

Table 23. Participants: Specific Forms of Financial Assistance that Would be Helpful (Question 12)

Response	Count	Percent
Equipment vouchers	12	43%
Tax breaks	8	29%
Fee waivers	5	18%
Grants	3	11%
Other (please specify)	0	0%
Total Respondents	28	100%

Waterborne Paint Systems

Table 24. Participants: Is Your Shop Considering a Waterborne Paint System? (Question 13)

Response	Count	Percent
Yes	18	60%
No	7	23%
Already using	5	17%
Total Respondents	30	100%

Non-participants—Summary

Satisfaction and Suggestions

Table 25. Non-participants: How Learned about Pilot Project (Question 2)

Response	Count	Percent
Letter/mailing	10	71%
Word-of-mouth	3	21%
Industry association or vendors	2	14%
Don't know or refused	0	0%
Inspector came to my shop for a site visit	0	0%
News article	0	0%
Website/internet	0	0%
Other (please specify)*	3	21%
Total Respondents	14	NA

* Includes only responses that could not be placed into existing categories; surveyor recorded details for additional responses not considered "other."

Other Responses—How Learned About Program (Question 2)

Respondent heard about program through KPA, LLC (formerly Kip Prah Associates).*

Phone call.

I know Laurel Tomchick, the EnviroStars Program Manager, stay current on my body shop's 5-star EnviroStars rating, and attend tradeshows. I also hosted an open house at my body shop to celebrate our EnviroStars rating and transition to a waterborne paint system. We invited other shop owners, members of the Department of Ecology, EnviroStars, Labor and Industries (L & I), and more.

Buddy owned a paint shop, mail, and fax.

* Response was categorized into existing response categories.

Satisfaction and Ratings

Table 26. Non-participants: Did Any Elements of the Pilot Project Sound Useful for Your Business? (Question 3)

Response	Count	Percent
Self-certification process	1	8%
Site visits/on-site technical assistance	1	8%
Technical assistance manual and materials	1	8%
Training workshops	1	8%
EnviroStars certification	1	8%
Ability to satisfy EPA reporting requirements for new air quality rules	1	8%
Other (please specify)	11	92%
Total Respondents	12	NA

Other Responses: Elements of Pilot Project That Sounded Useful to Non-participants (Question 3)

Currently have processes and subcontractors that help with those needs.

Did not read it; busy.

Did not receive any papers.

Didn't spend a lot of time on it; EPA guy said don't have enough volume.

No. [2 respondents]

None; use KPA guys to take care of everything and legal items.

Redid our containment system, all liquids on a containment deck. Stormwater car-wash arrangement—separates the rain water with the car wash water.

Sounded useful, but do not remember exactly.

We already do what we can to recycle everything we can, gross \$250k a year. Already do what we can, and allow us to afford. No stripping, or if do, machine stripping, mostly replace parts.

We're already beyond filling questionnaire; already do a bunch of recycling and stuff.

Table 27. Non-participant Challenges that Prevented Participation in the Pilot Project (Question 4)

Response	Count	Percent
Took too long/too busy/takes time away from doing work	4	31%
Already addressing in other ways	3	23%
Not applicable (size or nature of business)	3	23%
Not interested	3	23%
Did not address our concerns	2	15%
Assistance was not helpful	1	8%
Cost	1	8%
Too complicated/confusing	1	8%
Other	5	38%
Total Respondents	13	NA

Motivations, Incentives, and Benefits

Table 28. Non-Participants: Incentives that Would Motivate Future Participation (Question 5)

Response	Count	Percent
Financial assistance	9	82%
Public recognition	9	82%
Reduced inspections	9	82%
Regulatory flexibility	6	55%
Other (please specify)	3	27%
Total Respondents	11	NA

Other responses: Incentives That Would Motivate Non-participants (Question 5)

Too many entities trying to control our industry, no one has same rules and regulations.

Financial incentives are helpful, but respondent is not interested in low-interest loans or checks.

Guidance person: someone who walks through and gives tips. There's a group called SABCA. The pilot program could be similar to SABCA, before it was a strict regimen, and it should be more focused on auto industry education.

Table 29. Non-participants: Specific Forms of Financial Assistance that Would be Helpful (Question 6)

Response	Count	Percent
Equipment vouchers	4	14%
Tax breaks	2	7%
Fee waivers	1	4%
Grants	1	4%
Other (please specify)	0	0%
Total Respondents	8	29%

Participants—Complete Responses

Challenges (Question 5)

Self-certified Participants

Self-certified Participants—Challenges

Acquiring the time to comply, addressing the issues, work that into daily schedule.

Coming up with a game plan as it pertains to our business. Laying out the law book, discussing game plan.

Daunting, numbering system not used anymore for first question on the survey. Contacted Ecology about it. Terms.

Everybody knew about the project, but everybody can't afford to take care of any system or buy equipment right now—cannot afford any extra expense.

Hard to understand forms. Not tailored to their body shops. Tailored to more generic.

Implementing within the store, dealership collision center.

In good order; already trying to do a good job, not too many challenges.

It didn't pertain to my business. Don't pull mobile touch-up guys into it.

My shop implemented a system to prevent surface water runoff into the street, and the inspector approved of this system. There is a challenge of making sure all surface water runoff is cleaned up and not solely for auto body shops. For example, many residents wash their cars in their driveway and that dirty water collects in the street. This problem should be addressed.

No challenges; already have equipment.

Not really any challenges.

Old-time employees are saying, "This is ridiculous. Why can't we dump things in the drain?" Education of the employees falls by the wayside. I hold employees accountable for their actions when they are told not to.

Secondary containment (get stuff for that, but easy fix through Ecology) was changed, totally understood.

There were no challenges.

Told eye washer was too high, take Christmas lights down. Too many challenges to list.

Trouble getting answers. So many regulatory bodies involved in this stuff; no answers the same from different sources for same questions (e.g., water management, chasing down a contact, consistency problem).

Understanding exactly what they wanted. Once know what is needed, then can finish.

When new changes come about, there is no budgeting for it, financial aspect. Taking up more space to accommodate the new stuff. Training curve, learning curve.

Participants Receiving Site Visits Only

Participants Receiving Site Visits Only—Challenges

Amount of follow-up that they had to do.

Can't think of any; were EnviroStars before.

Change of habits; not too challenging, though.

Coming up to speed in a couple of facets that wasn't aware of (e.g., paint booth filters and proper disposal).

Had to get some paint booth filters tested.

Made me look at car washing, disposing of paint; more aware. Gives a heads-up, pay more attention. Other folks may not comply.

Move to waterborne material; new process handling waste.

My time—have to stay moving constantly; sets me behind in business.

No challenges.

No issues or problems.

No problems.

No problems; just had to send a tech through classes.

One meeting that one day.

Our efforts to comply and keep clean are not recognized by inspectors. How much cleaner can clean get? For example, we have implemented technology used to collect all dust particles and our efforts have not been recognized. My shop receives no recognition when waste is disposed of properly. Dust-free products seem to be diminishing, but I'm not sure why.

Time—took too long to verify sources.

Benefits (Question 6)

Self-certified Participants

Self-certified Participants—Benefits

Awareness regarding rules/compliance.

Became EnviroStars.

Being legal.

Benefit for everyone.

Better educated. Know exactly what we need to be doing, not just hearsay.

Better educated. There was an educational transition from what I thought I knew to what I should know. Learned some knowledge about Spokane air quality. During these tough economic times, it has been great to better ourselves and our business.

Self-certified Participants—Benefits

Better health, better for environment.

Do not know exactly. Government stops by and give a penalty; government makes businesses buy equipment; no benefit yet.

Environmentally friendly and helpful.

Having self-checklist is good to reassess our procedures/systems.

No apparent benefits, not so far.

No benefit apparent, slight benefit.

Nothing, not really.

Peace of mind created efficiencies in the way we run our business. In the long run, saving money.

Reminds us to think more about what harm the materials can harm humans, (breathing part, isocyanides, fresh air units). Health opens up your mind. More aware.

To become greener, more environmental friendly. More low-VOC products. As green as we could be.

Zero, a couple sleepless nights.

Participants Receiving Site Visits Only**Participants Receiving Site Visits Only—Benefits**

Being self-regulated makes me stay on top of things more and makes me pay more attention. It's a good thing.

Fitting within guidelines. More aware. In compliance.

Great information; being kept current on any changes.

Greater understanding of the process; staying on top of game.

Just knowledge about how things to be handled, information.

More aware of programs that were offered as far recycling materials not aware of. Cleaner, more efficient.

No apparent benefits.

No benefits yet; maybe would have if filled out form.

No benefits. [2 respondents]

No difference.

None at this point.

Overall awareness of different regulations regarding the auto industry, waste prevention, etc.

Safer work environment. Not too many changes.

Things are more organized, work-wise.

Suggestions for Improvement (Question 8)

Self-certified Participants

Self-certified Participants—Suggestions

Application is very detailed. Make it pretty simple as it is. No good answer.

Be clear about answers versus problems. Make sure the answers are consistent across all entities and all businesses. Improve communication through all sources.

Conveyance of program information and steps could be improved. A body shop should also not have to struggle to find information about what the shop should be doing to be in compliance. The rules and regulations should be easier to grasp. It is great to create a sense of awareness. Auto body shops should be given information about how a “successful” and “compliant” auto body shop has become aware of the specific rules and regulations. Other shops could then use this compliant business as an example while they are trying to meet the standards.

Coordinate in one deal, all agencies talk as one entity (Fire, King County, EPA). Make more streamlined.

Good question. Stick with what is implemented; no new rules. Implement steps/procedures at a pace that works with the business.

Involve people; paper is okay but doesn’t do the job.

Legally operating body shops are attacked by those who are illegally operating. I feel like I am attacked by the government agencies while other shops are illegal.

Make sure it applicable to the said business. If mobile unit, do not need to fill out—don’t include mobile people.

No suggestions. [2 respondents]

Not sure. Everything that we got was fairly easy. Shop was already operating accordingly.

Respondent suggested having one set of rules/regulations for all agencies. It is too complicated when dealing with a multitude of different situations and five different sets of rules. These rules may overlap between agencies, too. The hardest part is when the body shop just needs to get straight answers on questions regarding regulations, such as on air quality and filter disposal. The King County Health Department says that it is okay to dispose of filter disposals in the landfill, but other agencies do not seem to understand that procedure or standard. This is a similar situation to water management. There is too much overlapping between agencies. It would be great to have one agency in charge of everything.

Seemed okay to me.

Seemed to work well for me.

Such a good project now. More awareness regarding program. More aware of footprint to other businesses.

Went really smooth, people who I dealt with were great; everyone was helpful.

Participants Receiving Site Visits Only

Participants Receiving Site Visits Only—Suggestions

Assign one person to the region and utilize a step-by-step program to get everyone to do what they should be doing throughout the program. I felt like I was left on my own.

Could have more online interaction. Personal visits are great, but costly for both parties—online better than paper.

Done pretty well. I was told how to correct it; no issues.

Don't know how to improve. Program doesn't understand our side of the business.

I don't know.

I think Washington is pretty good at it. Maybe recognize shops for their good work.

Increasing communication across different agencies, departments, and areas. Everything else fantastic.

Instead of going after people who are complying, go after those who are not complying.

Make the program more voluntary as it is a little unnerving. In my shop, every second counts and time is valuable. Instead of just stopping by without advanced notice, the inspector should come through the shop with a more obvious reason.

More information. Did not get things in a timely manner.

Nice if the program could find back-road shops that aren't complying. No real changes needed. More screening before being picked for the program.

No suggestions. [2 respondents]

Should be mandatory. The program was fine.

The agency/inspector/research entity should do an inventory of material consumption and waste production within a specific area. Some areas may produce more waste than other regions or cities. Agencies should control more areas of the auto industry, including the sellers of materials who supply auto shops with potentially hazardous materials. There could be a controlled point of sale, meaning agency could track the amounts of materials that are being sold to various regions. What's the gross amount for sale of materials in that area? Agencies shouldn't nitpick the shops that are already complying but should research the ones that still need help.

Other Comments (Question 14)

Self-certified Participants

Self-certified Participants—Other Comments

Go after the businesses that shouldn't be in businesses. Turn in those businesses.

It was a good idea but not sure it was good in execution. Too long of a program (time-wise). Didn't receive info about my two other shops. Too much time. Inconsistent, as far as follow up. Process wasn't clear enough in the beginning. Got no response after turned in form, not until 6 months later. No continuity. People who walked through different stores were from different agencies (water, paint.) Be a more definitive process. Book and idea were excellent and was probably very helpful. Talk to people in the industry to learn about what these body shops do and to understand the challenges.

Make more businesses aware of it (maybe by way of mailers).

Make the rules easier.

No comments. [6 respondents]

No. Glad they did it. Helpful for all of us.

Not interested in spending lots of money on something that won't give a return: waterborne paint system. Had one, but then took it out. Manufacturers have not given us the color charts that we need. Have to blend as the color choices are limited, insurance companies don't pay for the blending. Used waterborne for 4.5 months, not cost-effective. Won't put it in until I'm forced to, based on above reasons. Auto industry is like medical industry: auto shops are guinea pig for upper-level folks—in medical industry, drug is distributed and then 20 years later, doctors find that it is not good. This is how the auto industry feels. Needs to be a logical and practical side to what needs to be done.

Really like to have a real body out doing inspections. A lot of shops getting away with a lot of bad things, so a live body is important.

Step in the right direction. Nice to be a part of it and know what's going on. Big stress for the business to not know about all that was covered in the self-certification form.

Talked with other folks—competitors. The competitors did not get it, why? Creates a sense of paranoia. Knew other guys in Pierce, Snohomish, King counties who got it. Was this random? Or everyone in the same boat?

Won't put in waterborne unless forced to, not worth it. Harder to be profitable with waterborne paint system. Will close up if waterborne is forced upon.

Participants Receiving Site Visits Only

Participants Receiving Site Visits Only—Other Comments

Has nothing to do with me. Please take me off the list. My shop involves only airbrushing.

If businesses comply, they should be rewarded. Car washes: agencies want it contained so running into closed water system, but people wash their cars on their driveway all the time; something should be done about this.

Keep the body shops informed. Send out literature; need to know the information.

More streamlined deal. Representative to work with the shop and walk them through. Similar to OSHA: don't see them, but all of a sudden someone comes in. Work with the shops closer. Know I'm in compliance, but don't know exactly where I'm at with every aspect. Wish I knew a little more about it.

No comments. [8 respondents]

No comments. Pretty clear-cut on what we are supposed to do.

Waterborne is small portion of the paint process and untested in the long run. It's costly. Don't know how much improvement there is.

Non-participants—Complete Responses

Challenges (Question 4)

Non-participants—Challenges That Prevented Participation

Bookkeeper maybe handled it.

Business so small.

Communication gap; information gets lost. You lost me as I read materials and sat at round table in Bellevue. Bring the materials back to the office and it sits there. So many departments. Don't want to sit down with the large book and answer questions. Not best use of time. A shop in Carnation that now is out of a garage illegally makes guys like me an easy target.

Didn't have anything to participate with. Was past deadline, told that could still participate, but fell through the cracks.

Don't do body work, no painting, just touch-up. No questions regarding what they do; form didn't apply to me. Think it's a great program.

Don't understand, need people to do it. Difficult, English is bad.

KPA's recommendation was to not do program but to self-certify through KPA.

No real reason; got busy. Don't know what happened.

No time. [2 respondents]

Size of business, no chemical stripping. Sent painters to a certification a few weeks ago.

Time and scheduling.

We already follow the right rules. HVLP gun is reliable. We use filter and paint booth, don't dump into drain, no oil changes.

Other Comments (Question 7)

Non-participants—Other Comments

Don't own our building, so wouldn't get much back. Team together and not have so many regulatory departments. State of Oregon has just one.

Good project, necessary for body shops.

Good to have open communication. We already follow the rules, have open-door policy, no need to do the self-certification form.

Keep it simple. Make the program less time-consuming and less labor-intensive. My shop hires out for our compliance check-ins as we have no time to do it ourselves. Make the Pilot Program easier to understand. Don't make it tough to understand. For example, the Department of Health walked through the shop and showed us exactly what to do to be in compliance. Regarding the Pilot Project, it would be great to have a liaison, or hire out to a company, to show shops what to do, be more hands-on, and indicate what steps to follow. We may have filled out the self-certification form in our own handwriting, but I do not remember.

No cold-calling. Send a letter that gives a heads up about the Pilot Project; don't just show up.

No comments. *[5 respondents]*

The Department of Ecology should have taken a more in depth look at how the Pilot Project would affect my auto body shop. Didn't really look useful to my business as we don't paint too much.

Think it's a good program.

Wish I would have received the papers and materials. I was interested in participating but did not hear back.

Appendix D. Project Team Survey Results with Data Tables

This appendix presents a summary of survey responses, followed by detailed individual responses, beginning on page 72. Note that responses from the project team include minor grammatical and typographical corrections; they should not be considered verbatim quotations.

Count of Respondents

Table 30. Interviews and Surveys Completed, by Category (Question 1)

Respondent Category	Respondents
Local Source Control Specialists	21
Department of Ecology staff member or manager	8
EnviroStars lead	3
U.S. Environmental Protection Agency Air team member	1
Other*	1
Total	34

* Department of Ecology respondent who completed verification visits only.

Survey Introduction

Table 31. Interest in Future Participation in a Sector-based, Voluntary Compliance Effort (Question 2)

Response	Count	Percent
Very interested	9	26%
Somewhat interested	9	26%
Neutral	6	18%
Somewhat uninterested	5	15%
Very uninterested	5	15%
Total Respondents	34	100%

Table 32. Preference for a Single Multimedia Program or Separate Programs (Question 3)

Response	Count	Percent
Single program	27	79%
Separate programs	2	6%
Don't know	5	15%
Total Respondents	34	100%

Table 33. Preference for a Broader, Multi-Sector Program or Targeted, Single-Sector Programs (Question 4)

Response	Count	Percent
Broader, multi-sector program	11	32%
Targeted, single-sector programs	17	50%
Don't know/no preference	6	18%
Total Respondents	34	100%

Project Elements

Table 34. Satisfaction with Site Visits and Checklist (Question 5a)

Response	Count	Percent
5=very satisfied	2	6%
4	9	28%
3	10	31%
2	8	25%
1=very dissatisfied	3	9%
Total Respondents	32	100%

Table 35. Satisfaction with Self-certification Process (Question 5b)

Response	Count	Percent
5=very satisfied	1	3%
4	4	13%
3	8	26%
2	13	42%
1=very dissatisfied	5	16%
Total Respondents	31	100%

Table 36. Satisfaction with Technical Assistance Materials (Question 5c)

Response	Count	Percent
5=very satisfied	6	19%
4	11	34%
3	10	31%
2	2	6%
1=very dissatisfied	3	9%
Total Respondents	32	100%

Table 37. Satisfaction with Project Promotion (Question 5d)

Response	Count	Percent
5=very satisfied	3	9%
4	5	16%
3	14	44%
2	4	13%
1=very dissatisfied	6	19%
Total Respondents	32	100%

Table 38. Satisfaction with Interagency Coordination (Question 5e)

Response	Count	Percent
5=very satisfied	1	3%
4	15	47%
3	9	28%
2	4	13%
1=very dissatisfied	3	9%
Total Respondents	32	100%

Table 39. Suggestions on Improving Site Visits and Checklist (Question 6)

Response Category	Count	Percent
Shorten checklist and visits	21	78%
Simplify process, make more user-friendly	10	37%
More focus on technical assistance and responsiveness	3	11%
Don't conduct auto body visits in winter	2	7%
Improve the list of businesses	2	7%
Split into multiple visits	2	7%
Other suggestions	13	48%
Not applicable	1	4%
Total Respondents	27	NA

Table 40. Suggestions on Improving Self-certification Process (Question 7)

Response Category	Count	Percent
Make process and form shorter and clearer	9	38%
Provide incentives or penalties	5	21%
Combine form with direct contact	4	17%
Eliminate self-certification process	4	17%
Improve communication and responsiveness	4	17%
Create an electronic or web-based form	2	8%
Ensure businesses complete the form only once, whether self-certification or site visit	2	8%
Make the process mandatory	2	8%
Other suggestions	6	25%
Not applicable or don't know	4	17%
Total Respondents	24	NA

Table 41. Suggestions on Improving Technical Assistance Materials (Question 8)

Response Category	Count	Percent
Good that it was comprehensive	9	35%
Simplify or combine with shorter pieces	9	35%
Provide in alternate formats (videos, electronic)	4	15%
Other	7	27%
Don't know or no suggestions	10	38%
Total Respondents	26	NA

Table 42. Suggestions on Improving Project Promotion (Question 9)

Response Category	Count	Percent
Work more with business and trade groups	11	39%
Improve communication and coordination; don't cancel workshops	5	18%
Simplify program	4	14%
Increase direct contact (phone calls, visits)	3	11%
Offer incentives, including regulatory	3	11%
Other	10	36%
Not applicable	3	11%
Total Respondents	28	NA

Table 43. Suggestions on Improving Interagency Coordination (Question 10)

Response Category	Count	Percent
Communication with local partners	11	44%
Coordination with other programs	6	24%
Expectations and project design	5	20%
Timeline	4	16%
Checklist	2	8%
Other	11	44%
Not applicable, don't know, or none	5	20%
Total Respondents	25	NA

Other Opportunities for Improvement

Table 44. Other Challenges Experienced (Question 11)

Response Category	Count	Percent
Communication with local partners	11	44%
Coordination with other programs	6	24%
Expectations and project design	5	20%
Timeline	4	16%
Checklist	2	8%
Other	11	44%
Not applicable, don't know, or none	5	20%
Total Respondents	25	NA

Table 45. Suggestions on Applying Lessons Learned to Future Programs (Question 12)

Response Category	Count	Percent
Focus on helping and partnering with business owners	5	18%
Provide industry-specific information and training	5	18%
Offer Incentives	3	11%
Support or confirm self-certification with visits or mandatory compliance	3	11%
Work more closely with local programs	3	11%
Other responses	19	68%
Not applicable or "see above"	5	18%
Total Respondents	28	NA

Complete Responses

Below are the open-ended survey responses from members of the project team. They include some minor edits to correct typographical errors contained in the original survey responses and to protect anonymity of respondents as needed.

Site Visits and Checklist (Question 6)

Suggestions on Site Visits and Checklist (Question 6)

1. Site visits need to be timed according to the work load of the sector. Visiting auto body shops in December when they were overwhelmed with vehicles that had been involved in car accidents in the snowy weather was not good timing.
2. The list of businesses we were provided was not accurate, which wasted a lot of time going to visit businesses that no longer existed. Any lists used in the future should be cross-referenced with the phone book, which tends to be the most current.
3. The auto body checklist was OK. A checklist that is specific to the sector provides a more thorough evaluation of the business (as compared to the LSC checklist). The checklist should be as brief as possible, while still containing the most important information.

Before commencing the site visit I took time to bond with the owner and presented them with the manual. I explained the steps to complete the site visit. This allowed time to bond with them before they answered questions on the checklist. I explained how to identify non-compliance issues and where to find the requirement outlined in the manual.

Checklist: shorter and focused tightly on only those areas that are critical and relevant. If it is not an RTC [return to compliance] question, does it really need to be there?

Site visits: entire process was HUGE overkill.

I am a huge supporter of the sector-based approach. I loved all the training we got beforehand. It is much preferred to walk into a business really understanding, beforehand, what their issues are likely to be. It makes us look like knowledgeable experts and is easier to build quality partnerships with the businesses. Now, that said, if we do all this work to build partnerships and then make them fill out the same checklist three times... well, that simply irritates people. It feels like over-regulation to them. It simply turns them off to wanting to work with us. I cannot state this strongly enough, we need to minimize the disruption we caused: get in to assess how they are doing, provide help to get them into compliance, move on.

Consolidated.

Cut the checklist by 60%. It was too much and too complex.

Hit the high points—maybe 10 main issues each visit, not 108 questions. All the materials were written with a pretty high comprehension level in mind. As they are regulatory assistance, it makes sense on some level, but they also need to be readable. This goes for the site self-certification, as it was almost the identical document as the checklist.

Suggestions on Site Visits and Checklist (Question 6)

I did not participate in the visits or use the checklist.

More training for site visit employees.

Better checklist.

Shorter checklist.

Potentially break checklist into multiple visits.

Focus on technical assistance instead of checklist.

Questions need to be yes/no and, if not, then write in your own answer.

Shorten the checklist.

Shortened, folded into the existing LSC effort—will reduce time it takes to complete visit.

Shorter checklist. Site visits need to be compliance-based and enforcement, not technical assistance. Or, if technical assistance, make it very clear to the businesses that although the site visit is non-enforcement, if problems are found they “could” lead to enforcement later on.

Shorter, more focused checklist (which would result in shorter site visits). Ideally a way to enter the answers directly into a database so that data entry could be streamlined. The checklists were handled many times by many different people. This was a very inefficient process.

Site visits: It is always difficult with voluntary compliance. It would be easier if it were mandatory for the businesses. They don't understand why we are there if it is voluntary, no matter how much we explain it to them. Some businesses did not read any of the materials sent to them ahead of time in the mail. The checklist was still too long, and some questions were confusing. Although businesses were accommodating, they became anxious and sometimes annoyed when the visits took so much of their time, and often they did not learn much from the process. But I understand since it was multimedia, it had to be long. (In this regard, it might be easier to separate visits based on hazardous waste, air, and stormwater in order to shorten the visits.)

Streamline even further; text could be more user-friendly.

The checklist was detailed and well-thought out. It provided a good compliance tool for many program areas (hazardous waste, air, water, etc.). It may have been too much for small businesses, with limited time to perform the technical assistance visit. Refining the checklist and narrowing the field of questions may have helped to speed up the process while still providing comparable data to trend improvements in compliance.

The checklist was far too long and cumbersome. Having the “answers” (return to compliance) marked on the checklist likely prevented honest answers in some cases. Site visits should have been scheduled for summer months when the auto body industry is generally a lot slower. The site visits and amount of time required of the businesses to fill out checklists, go through the materials, etc. was a huge burden to expect businesses to undertake during their busiest time of the year.

Suggestions on Site Visits and Checklist (Question 6)

The checklist was very thorough and that was great. We have already provided detailed feedback to Ecology on how intricate details can be changed about the checklist and therefore a new checklist was created. The businesses that turned specialists away should have to be visited by Ecology. This will help level the playing field. Many businesses did huge amounts of work to come into compliance and thoroughly reached goals, while others turned us away after many attempted tries and never received any materials or compliance information that the rest of them all had to go through. Having one business on one side of town willingly submit to multiple hours of regulatory assistance, and then have one on the other that turns it all away is not fair to the businesses that made efforts to come into compliance. I would like to see consequences (i.e., visits with Ecology) to the businesses that did not let source controllers meet with them.

The checklists contained contradictory information and were too long. The questions were vetted with the LSCS group, but it seemed like a lot of the feedback was not incorporated because it brought up issues that were too complicated for the program management to deal with. The “RTC” issue ended up meaning nothing. This program was a disservice to the business community and has probably soured a lot of them on “compliance assistance” programs.

The checklists were too long and many questions were difficult to answer for the typical body shop. The checklists need to be simplified in the future. The checklist focused on every single thing that could possibly apply to a body shop. This made the checklist overwhelming. I suggest making a checklist that covers the primary needs for the industry sector and have a second checklist that covers everything. You can use the second checklist for those who want to do bonus work.

The checklists were too long, not reasonable to complete in the field. The site visits were fine but I prefer to give a company feedback immediately after the visit and provide information and a letter as follow-up. Not providing this information targeted to the specific problems seen was not an efficient way to do things. I only had one business that actually reviewed the self-certification information.

The checklists were too long. They need to be significantly shorter.

The formula for the site visits was pretty cumbersome to get the randomization. It also didn't necessarily get the right businesses. I think a better process may be to have the locals send in the businesses in their area and then randomize that; that might be less work in the end. The checklists themselves were too long and seemed to repeat several of the questions. They were also written in bureaucratese, making it difficult at times to translate for the business owner.

The questions could be streamlined a bit.

This project was way too complicated for the business owner. It should be abbreviated both in time of visit and size of checklist. Many issues on the checklist were unnecessary.

Too many questions. The inspections took too long—usually at least one hour in the shop plus follow-up because some questions were unknown by every shop (for example, #33). Also, I suggest deleting the RTC note next to some questions. It doesn't always apply, especially to SQGs [small quantity

Suggestions on Site Visits and Checklist (Question 6)

generators], and it was confusing sometimes when trying to explain what is truly required of the shops we visited.

When you conduct a site visit, the inspector should be able to provide assistance and feedback to the business while they are on site (if they know the answer) or provide the feedback in a timely manner. Businesses want assistance in compliance, not just provided a tome that they have to wade through in order to find the answer to their question.

Self-certification Process (Question 7)

Suggestions on Self-certification Process (Question 7)

1. Actual experience: LSC specialists were not told of the whole schedule of activities at the outset of the program and therefore were not aware that the businesses would end up filling out the checklist multiple times. This led to situations where I told businesses that “just fill this out and we will e-mail you a list of BMPs [best management practices] to correct and that will be it.” None of us seemed to know that the business would end up having to fill a checklist out 2-3 times by the end of the effort: initial with inspector, self-certification on their own, and then verification visit checklist filled out by LSC specialist.

1b. How it could be improved: LSC specialists should have known the entire process including the self-certification visit process at the beginning of the process before we mistakenly misled some of the businesses about the duration and efforts of the program.

2. After going through the self-certification process all jurisdictions should have been required to provide a statement of accomplishments that the business achieved. Several businesses asked me for this. After putting much time and effort into the program, they wanted to have it in writing which practices had been documented as changed for the better in our system. If they achieved full compliance by implementing all follow-up items requested by Ecology they also should have received a certificate that they could post that signifies that they made special efforts as a part of this program and that they are in compliance with items identified by Ecology on such and such date. Or receive a plaque or something.

3. Lastly, I know there was a mix-up and some of the businesses that filled out the self-certification were actually sent a request to fill out the certification again accidentally. I know we all make mistakes, but this was an embarrassing one. Some of the businesses then became nervous that their hard work on the self-certifications had been lost by Ecology even though we still had that information.

As I stated above, some businesses did not even open up the envelope sent to them explaining the process. It was overwhelming and confusing for most businesses. We only had one of our businesses complete the process. If businesses would actually follow through and complete the process, it would probably be a great way to gather information and help businesses instead of doing a voluntary inspection. So possibly we could make phone calls to ensure businesses complete their self-certification form. If they do complete the form, they should not have to also have an inspection. It should be one or the other.

At times the self-certification process was unclear. The business had items to complete (compliance-based) that required a response or follow-up from the business to the certifying agency (EnviroStars). It was uncertain if the business was aware of this obligation (or lost interest), and the self-certification stalled. An online self-certification may have help. Items requiring correction could have been highlighted with a “correct by” date. Automated e-mail reminders could have been generated to prompt a response (have the findings been corrected?); or acknowledge completion of the self-certification process, providing a printable certificate. More automation could have helped streamline the process and avoid confusion.

Don't have it. The questions and issues were too overwhelming for businesses to self-certify and were

Suggestions on Self-certification Process (Question 7)

contradictory so they were not meaningful for businesses.

I don't know that most generators would be qualified to self-certify. There should be some demonstration of comprehension required before that would be allowed?

I think the businesses should be contacted directly (phone calls, e-mails, or personal visits) rather than just by mail, to encourage their participation in the self-certification process. The ERP workshop that was arranged in my jurisdiction had zero attendees. I believe there was a date or venue change and that was not communicated to the auto body shops. Again, I think personal phone calls or e-mails to remind and encourage businesses to participate would have helped. Added incentives for the businesses to participate might improve the participation rate.

I think the only way it would work is if there were a major penalty or a major monetary incentive.

Make it mandatory. This could potentially significantly reduce total site visit time. Then we could just spot-check specific items on a checklist.

Not sure this approach can work.

Rather than explain the worksheets and process only in special workshop sessions, attend industry meetings and conferences to introduce and walk businesses through the process.

Require mandatory self-certification.

Self-certification does not work. Business owners are too busy to do this on their own and answer questions with knowledge. It takes technical assistance, compliance inspection, and viable enforcement threat to make sure compliance is achieved. This was a waste of time.

Self-certification should be reserved for lower-risk business categories. Auto body by the very nature of the work is a high-risk pollution-generating activity and should not be considered a good candidate for self-certification. Follow-up visits that found shops out of compliance with their self-certifications should have included follow-up and consequences for misrepresentation. I know of shops in our jurisdiction and have heard of others that started off a mess and ended up a mess, yet there was no follow-through on achieving compliance at these sites. This type of program only makes achieving compliance down the road more difficult as the business assumes that eventually the regulator just goes away without any need to really change practices and no consequences for making that choice.

Shortened, incentive attached.

Shorter checklist focusing on important questions only.

Better explanation of questions and how to answer.

Shorter self-certification form, more incentives for the shops that complete self-certification forms. Ideally a way to enter the answers directly into a database so that data entry could be streamlined. The checklists were handled many times by many different people. This was a very inefficient process.

Suggestions on Self-certification Process (Question 7)

Some of our self-certification people complained that they sent it in and got nothing back. They didn't know if it had been received, if they were in compliance, if they were doing something wrong and that is why they didn't get their certificate. Other business owners that requested help did not know the terminology, the bureaucratese, and did not know how to answer questions.

The process was lengthy over a period of 1.5 years, with little ability to provide a business assistance outside the program set in motion. The program would have been more effective if it was made an element of the Local Source Control site visit process.

Why did I certify them, then they were asked to fill out the exact same form a second time to self-certify themselves? Made no sense.

Same comments as #6. [The checklists were too long and many questions were difficult to answer for the typical body shop. The checklists need to be simplified in the future. The checklist focused on every single thing that could possibly apply to a body shop. This made the checklist overwhelming. I suggest making a checklist that covers the primary needs for the industry sector and have a second checklist that covers everything. You can use the second checklist for those who want to do bonus work.]

Not able to comment as I did not see the self-certification process.

I am not sure. [2 respondents]

Not applicable.

Technical Assistance Materials (Question 8)

Suggestions on Technical Assistance Materials (Question 8)

Again, there was so many factors that it would be better to simplify and focus on the primary needs of each industry sector. The manual did a good job explaining the checklist, but it was large.

Consider English as a second language audience... more relevant photos and diagrams that would identify issues clearly without requiring a high reading level.

Cut it down to the basic. Very large manual, we have had more success with do/don't lists.

Directions for non-LSC Specialists to easily locate the materials on ECY [Department of Ecology] website.

From my view point, they were very thorough. I especially liked the CD. From the business viewpoint, they may seem overwhelming. Many businesses can only cope with a few bullet points. I tried to remind businesses that running an auto body shop is complex and that it is their job to stay on top of the various complex regulations.

I liked the manual and I liked the training that I received. Well done!

I thought the technical assistance materials were excellent.

I thought they were pretty good.

I'm not sure. The manual was very comprehensive, which some shops appreciated. However, according to comments from some LSCS, some shops found the manual overwhelming.

Individual booklets for each media.

More information and ECY staff to one-on-one help businesses.

No improvement. I thought the technical assistance materials were very well done.

Presented as webinar(s) that can be easily accessed at any time, and indexed so viewer can quickly access specific topics.

Send reminder about the upcoming EPA reporting requirements in 2011.

The manual does provide good information. It is so long that businesses are intimidated by it. Provide it in electronic format that allows the reader to search the document by topic queries.

The manual is pretty comprehensive, so I don't know how that could be improved.

The manual was very thorough and took a great deal of effort on the part of Ecology staff in particular to come to agreement on what should be included (in technical assistance materials as well as the checklist). It's a good reference; however, need more "bite-sized" technical assistance pieces too—

Suggestions on Technical Assistance Materials (Question 8)

maybe video segments in a shop that could be used in safety meetings.

The TA [technical assistance] materials were good and thorough.

The technical assistance manual for auto body shops was a great document. The businesses that I encountered during the re-visits that had received it on disc unfortunately had not looked at it and were not quite sure what was on it. When I explained how it could be helpful, they seemed interested. So if the businesses had a direct contact visit or a training seminar where they were shown a preview of the materials, they might be more likely to use them later on their own.

The technical assistance materials were good, but no shop wants to wade through everything to find the bit that might apply to their issues.

The technical assistance workbook was good as a research and reference tool, but not as a tool to be provided to the business community. If materials are provided to auto shops they should be short and sweet and maybe just a poster.

The workshops were not well-organized. Some were canceled with no notification. It was very disappointing for attendees to make the effort to attend only to find locked doors and no explanation.

This was the star of the program—the technical assistance manual was amazingly useful, well laid out, and easy to find information in. This is only feedback from me—I did not get any feedback on materials from businesses.

Very simple, one page, or just refer to web-based services.

Unknown.

Not applicable.

Project Promotions (Question 9)

Suggestions on Project Promotions (Question 9)

1. If the sector has a local association, working with them to assist in the promotion would be very valuable. The peer pressure, or not wanting to be left out, can be an added incentive for members to participate.
2. Use of media such as e-mail, websites, Facebook.
3. Direct communication such as visits and phone calls.

Better coordination and communication on the goals and end result would have been helpful.

Better incentives for participation, amnesty for missing permits if permits are properly applied for in the project time frame

Better promotion through business associations, work groups or trade associations.

Businesses did not feel like they were “getting” anything for putting out the effort. The project may have been more successful if businesses that did not participate missed out on something that participating businesses got. Businesses that identified non-compliance items and changed practices were not treated differently than businesses that identified similar compliance issues and did nothing.

Coordinate more with industry (vendors, distributors, etc.) to have training sponsored by them with regulators as a guest.

Don't cancel meetings at the last minute and not tell the businesses who RSVP'ed or the LSCS people. I recommend NOT continuing this program; therefore, I would not recommend the project promotion be improved.

Follow through and provide the training and meetings with the trade associations throughout the region. Credibility is lost when there is no follow-through.

Further cultivate industry association involvement and their advocacy of pollution prevention; consider incentives—maybe partial payment of association dues or partial reduction of dues; become part of continuing education/training sessions and bring the latest, greatest info that will help businesses be more competitive.

Go through industry associations—like ASA, WSDA, etc.

I am not sure what this means but what comes to mind is that I wish that the trainings put on by Alison were not cancelled. I know they had bad turn-out at the first few, but the cancellation of the ones in the rest of the region made it look to the businesses that may have been planning to attend that government was taking away the chance for Ecology to provide assistance and the businesses to meet with regulators in one place.

I did not care for the project, so I can't endorse its promotion.

Suggestions on Project Promotions (Question 9)

It was not easy for businesses to understand who was administering the program, even though we explained it to them (EPA, Ecology, local jurisdiction, consultants, etc.). We also shouldn't have so many phases: pilot, self-certification, follow-up, etc. Project administrators need to step back and imagine what this looks like to a business and realize many do not read their mail. How can an inspector verbally explain the program to a shop in 30 seconds without their eyes glazing over?

It was promoted as much as possible. The message should have emphasized the multimedia approach more and less on EnviroStars. EnviroStars is an incentive but not one which would drive shops to want to participate by completing a daunting checklist.

Make phone calls to shops to confirm they received materials and have reviewed them. Many shops we visited did not remember receiving anything from Ecology—or if they did, they just filed it or recycled it. Just sending letters and packets of information is not enough to get people to pay attention.

Maybe the project could be promoted through the auto body trade association.

Maybe focus on technical training instead of “program” aspect.

More incorporation of business groups and better coordination between those groups and inspectors. My understanding was that there was some coordination between Ecology and business groups but in general very little between the people actually doing the inspections and the business groups.

Most people felt like they got a lot of stuff in the mail, maybe too much. A few people who were not auto shops complained about getting the initial send-out, then the self-certification, then another technical assistance package, and were annoyed that all this came for them. Waste of money.

Need a marketing plan and communications support. It would be useful to include success stories on the web or in the media.

Possibly making calls to sources before sending out materials. Linking EnviroStars with the program was a great idea.

Sorry, I did not see the promotion materials, so this is just a comment on my follow-up visits to auto body shops. Make the process simple and clearly define the benefits to the business for completing the certification process. Most that I talked to wanted to do the right thing for the environment but initially saw little connection to taking the steps required for EnviroStars certification.

Stress to them the process is going to be minimally disruptive to their business, then keep your word. It is always going to be a difficult sell to walk into a business with the line: “I'm from the government and I am here to help.” The non-regulatory approach helps to gain access, as long as there is not an underlying current of “You better do what I say, or else!”

We could have worked more with the trade associations and paint vendors. Alison did some of this, but there should have been more.

Suggestions on Project Promotions (Question 9)

We had one industry consultant who was included in project outreach at the beginning, and later on additional service/equipment vendors were included. This seems like an effective way to reach the businesses—they trust the people who are in their shops on a regular basis.

I don't know.

Not applicable. [2 respondents]

Interagency Coordination (Question 10)

Suggestions on Interagency Coordination (Question 10)

Although my air agency was helpful, there could have been more expected involvement from them at the start. (I should have asked them at the beginning for a list of permits from all of my businesses on my list. Ecology could have told them to be ready to supply them if requested. When I called, staff did not understand the program at first.) Ecology inspectors were sometimes easily approachable, sometimes not. The fire departments should have been involved as well. The EnviroStars coordination was fabulous, and it would have helped if we had similar coordination from other agencies. Or it would help if our program was more widely explained to other agencies ahead of time.

Be more forthcoming about how the information will be used by Ecology. Different jurisdictions have different approaches for building relationships with local businesses. Knowing how the information from the ERP will be used will help prepare local government for dealing with any RTC issues by local businesses.

Clear steps in timeframe from start to finish, each person and agencies role clearly defined, and feedback on what was provided.

Consider focusing/narrowing, rather than let's include every agency and every generator will be confused.

Have a much better database for tracking and reporting—where everyone has access.

I think communication is essential. There were times when I e-mailed Ecology on questions or issues, and I did not get a response. Also, I learned about an EPA training when visiting the auto body shops. I wish we (LSC) were given the opportunity to attend an EPA training.

I think this went OK. There were a lot of dates changing and confusion about what was supposed to happen when, but I think that was because we were trying to do too many things (too many contacts/disruptions).

I thought the coordination was fine. Frequent updates and project timelines (including changes) are important to keep everyone current.

In Spokane, we have a tremendous interagency program with Ecology, Health District, Clean Air, Spokane Aquifer Joint Board, County Water district, City and Regional Solid Waste systems, and the Spokane River Forum. Our model may be good for other areas wanting to coordinate their work together.

In the case of auto body, it would have been nice to have more time available from the clean air agency. For other issues, like stormwater, sewer, chop shops, etc., those are local issues and we already have our local contacts for those, so that is already set up.

It was a struggle at times. Maybe the problem was that it seemed like there was much talk at Ecology that went on with managers and Alison but the managers never seemed to sit in on the conference

Suggestions on Interagency Coordination (Question 10)

calls with the specialists that were out there working with the Auto Body shops. This program also would need to move much quicker next time. Having a two-year implementation schedule was too long. I found in some of the meetings that there was a disconnect with some Ecology folks that what the regulations say is supposed to be in place at a facility many times is not what we saw in place out there in the field. In other words, just because the stormwater regulations mandate one thing doesn't mean that it will be that way out in the field. I can't think of the specific example of when this came up, but it did.

Listen to the LSC specialists and incorporate their feedback into the process. They are the ones who are the face of this program and have to deal with the repercussions of the relationship that the program creates.

More clear about expectations, how goals will be accomplished, and consequences for not achieving minimum performance levels.

Occasionally communication was not prompt, or timely. I think this was the burden of a large project with a changing focus.

One project manager that is organized and a team player.

Overall, I thought interagency coordination was pretty good.

Overall project management needs to improve. Better communication/engagement with local partners. Coherent project design and timeline (or if so, then better communicated with partners).

Reduce communication confusion; set and meet realistic time schedules; provide thanks and results to participating businesses; follow-through with promise to shops to attain NESHAP approval from EPA—as I understand it, turns out EPA was short of staff and the approval process went into a dusty drawer.

The materials were not proofread internally or externally prior to the initial training as evidenced by the training held in Lacey. During that training there were many, many things pointed out within the materials that were either plain inaccurate, illegal, or misleading, making many answers to the checklist meaningless.

There could have been more coordination between the EnviroStars contacts and the LSCS in some of the EnviroStars counties.

There was a lot of effort put into communicating and coordinating between Ecology, EnviroStars, and Local Source Control programs—which was appreciated. There seemed to be a little under-the-surface tension for some Local Source Control specialists with regard to EnviroStars. I'm not perfectly clear on what it was, but there may have been some crossover or confusion in the purpose of each group's work. I think there is room to improve relationships and a strong foundation has been built for future work together. On the other hand, a number of staff were both EnviroStars and Local Source Control assistance providers, so that should have made it easier.

Suggestions on Interagency Coordination (Question 10)

This was handled well.

See comment on #11. [It would have been nice to have a meeting of everyone to run through the checklist first before having a meeting explaining on how the checklist should be filled out. We ended up answering questions the entire time, which showed the checklist still needed some work. We needed to have everyone together though to get this much needed input.]

Wasn't involved with that part of the project, so I don't know.

Not applicable.

Other Challenges (Question 11)

Other Challenges (Question 11)

A lot of the addresses were incorrect, businesses were no longer open, many did not want to participate and were given amnesty despite some potentially messy sites

Confusing from the start, and it didn't seem to get any better. I was never sold on the idea that this project had merit and still can find little benefit to the whole project. It took more time than necessary and could have been handled more efficiently if all of these auto body shops had been visited by an agency with authority to require proper compliance and have enforcement strength. This industry is not ignorant of these regulations, and if they are, they should not be in business.

Dealing with hostility by shops.

I had many businesses with air permits that didn't make it into the universe, and we never got that sorted out. I visited some of them in the Local Source Control visits, but I still have a couple left. In addition, some of the businesses were visited by local programs recently, and there was nowhere on the form to document this. It seemed as if EPA was assuming no businesses had been visited before, when many had several times. In the future, program dollars should go towards jurisdictions where no outreach has occurred in the past.

I think the businesses required more tangible incentives (advertising, money, etc.) to make the certification program a priority. I think there were too many competing interests for most business owners. Those that did choose to participate were high-performing businesses.

It felt complicated—more so than maybe it needed to be, but being the first attempt to bring a modified version of ERP to our state, perhaps this was to be expected. Having common trainings and sharing an understanding of what we all have as a vision/goals for the project as one team, rather than as separate program interests, might have helped. We also ran into unforeseen challenges with a severe winter, which meant that the collision repair shops were swamped with work during some key times that we were trying to reach or visit them for the project.

It seemed that time and again deadlines were set and broken by Ecology. Confidence in the program was low from the get-go due to the initial training held in Lacey when it became very obvious that many of the materials were still in draft form or not even available. However, strict adherence to deadlines for those outside of Ecology was expected—at times even when information and/or materials were still not available from Ecology. In general the program seemed very disorganized and pieced together at the last possible second with no clear direction on follow-up, outcomes, and next steps.

It would have been nice to have a meeting of everyone to run through the checklist first before having a meeting explaining on how the checklist should be filled out. We ended up answering questions the entire time, which showed the checklist still needed some work. We needed to have everyone together though to get this much needed input.

Remains to be seen—was the extraordinary time and resources involved in working the pilot worth it

Other Challenges (Question 11)

to the businesses? Are they more competitive? More profitable? Have their work practices changed, and is pollution prevention detectable? Are our urban waters improving?

Site visit employees not following instructions. Site visit employees not completing checklists.

The complexity of weaving Local Source Control, EnviroStars, and ERP together was too great. A HWTR [Hazardous Waste and Toxics Reduction Program in the Department of Ecology] person with specific experience in such projects would have had a hard time making it work well, let alone an individual who had never done such work before. The bigger the project the more important to use experienced HWTR staff to lead.

The management of the program was very poor—very poor communication.

The primary challenges in this program were associated with the lists of businesses provided by the department of Ecology. What should have happened is that each agency was provided with funding to develop the lists themselves. I don't know what database was used to create the business lists, but it was very inaccurate and created a lot of trouble when it came time to implement the program at our agency.

The project for the most part was pretty straightforward, and not too challenging to participate in.

There were multiple staff-related challenges. There was also a challenge related to starting up two new programs (LSC and ERP) at the same time.

There were not answers or solutions for some items, so we could tell people what not to do but could not tell them a right way to do it. I also feel like the auto body industry has been fairly well-targeted, and it would be more appropriate to spend the resources on a different business group, like mobile painters or carpet cleaners or property managers. Or government shops.

This may not apply, but what I found in follow-up visits was that businesses need support to put systems in place to maintain the corrections they may have made for ERP or LSC but that have not been fully sustained over time.

Not applicable.

None.

Applying Lessons Learned to Improve Future Programs (Question 12)

Suggestions on Applying Lessons Learned from Pilot to Improve Future Programs (Question 12)

A program like this would be good for boat builders/repair businesses. They have many issues, and creating a checklist and manual that goes over it all would be extremely useful to the many agencies and jurisdictions that are involved with the shops.

Again, we need to accomplish our goal of minimizing pollution while minimizing the disruption to businesses.

As stated in previous answers: refined/narrowed checklist; more automation (self-certification); better promotion through business community (work groups); and more tangible incentives.

Better communication and offer applicable industry-specific training

Better project design and early identification of data, data collection, and data management issues. Sector-specific project is fine, may want to consider basin/sub-basin, sensitive area, wellhead protection area, or other geographic designation. Or target multiple sectors that each have (for example) air quality issues, or are known to generate particular pollutants of concern. Ensure that when commitments are made, particularly to trade/industry partners, they are kept.

Choose a lower-risk pollution-generating industry for self-certification programs. Auto body shops are not well-regulated and need a lot of work and follow-up to get up to speed with other high-risk industries.

Spend the time upfront organizing the program, rather than throwing it all together mid-stream. Have materials completed (and accurate) prior to setting deadlines and rolling out the program.

Study the industry that you are targeting and try to work with them to market the program using their language (collision repair vs. auto body) and rolling out a program during a low season.

Work with local agencies that will be running the program to get input on how best to implement in their jurisdiction upfront to design a program that will be feasible for all involved.

Brainstorm upfront on how to handle follow-up, referrals, dishonesty on self-certification, etc.

There needs to be incentive or disincentive.

Consider being less caught up in what is statistically relevant and more focused on what would actually affect the industry and help the generators.

Do not do similar programs in this fashion.

Don't know what lessons are yet, so don't know if they apply in future. But better training is essential to any future work.

For programs to be successful, I feel they need to come from a more local level to meet the larger goal. This program took place in local communities, but with materials, letters, from a larger agency that was too formal.

Suggestions on Applying Lessons Learned from Pilot to Improve Future Programs (Question 12)

I don't think you can ever go to total self-certification. The material is just too technical and bureaucratic for a person who is already running a business and doing all that entails, especially a smaller shop. Having us available to assist if you do self-certification again would be better

I have found that it is best to not call businesses before visiting, as it gives them an opportunity to decline. Also, it is necessary to be very flexible and be prepared and willing to re-visit at a time that is convenient to the business, as many do not have a lot of time to spare. With this approach, I have been successful in encouraging most businesses to complete a checklist.

I think the standard Local Source Control program is more cost-effective, promotes more behavior change, and is more flexible.

I would not suggest conducting future similar programs—I'm still not sure how this program had any benefit to the business community.

If we were to conduct another ERP-type project, I would suggest keeping it simple and focused on one or two key issues, rather than the multiple issues that we tried to address in this project.

Is it reasonable to think about targeting a sample of businesses within a specific industry (maybe the worst and the best) and providing intense technical assistance and pairing them up to mentor? Is this a means to improving the industry overall? And improving urban water quality? Does not seem realistic to aim at ALL businesses within an industry.

It seems that the costs associated with implementing a voluntary compliance program are not worth the pollution prevention outcomes. In the future voluntary compliance and checklists should be incorporated into a mandatory compliance program that spot-checks individual businesses to ensure they are doing what they say they are doing on the checklist.

More sectors; more time dedicate to working with business owners one-on-one; follow through and follow up.

Need to share the baseline data earlier in the process to show the connection with the whole program.

Offer incentives to the businesses—like reduced hazardous waste fee, less B&O tax, reduced business licensing fee, or something like that. I know that if I was a business and a regulator wanted to come in for an inspection—especially if it was voluntary, I would be MUCH more agreeable if you could offer me something—like \$\$\$ or \$\$\$ savings in some area of my business.

The focus on a single industry has been useful for deeply understanding the issues, needs, and technical assistance for a business sector, rather than being spread thin understanding a wide range of businesses.

The Local Source Control program conducted at the local level in face-to-face meetings provides better feedback to the needs of the business. Since we do not have the funding to have every business receive face-to-face meetings whenever they need it, development of sector information “manuals” with query

Suggestions on Applying Lessons Learned from Pilot to Improve Future Programs (Question 12)

search functions would be helpful.

Use experienced HWTR staff to lead such projects. I would not suggest doing any more ERP-type work. We have done TA without an enforcement leg to projects and succeeded well. It worked so well in Massachusetts because they had never had TA before. Bad comparison between states as a decision point to choose such a project. Do not tie a TA project to another project like Local Source Control. Both were getting started and were tied together because of manpower issues. If Ecology doesn't have the manpower, they shouldn't do the project!!!! Never use outside sources for inspections again.

I think I addressed this in other questions.

Addressed in answers to last two questions.

See comments above. *[2 respondents]*

Not applicable.

Other Comments (Question 13)

Other Comments (Question 13)

As a pilot program, I thought it was well-done. There were things that need improvement, but they were not deal-breakers in my mind. This is a good template that with tweaks could make a great program. By this I mean maintain the technical assistance manuals, continue with the agency/business cooperation, improve the business lists, improve the local agency/business group communication, and incorporate a mandatory compliance aspect into the program.

Do not choose a sector that has been done before unless you are trying to measure if previous work in the sector was good or not. Use new sectors which have not been reached yet by Ecology HWTR or are in the process of being identified by Ecology. Stormwater issues were the result of this ERP, and HWTR is not in the stormwater business per se. We do talk with businesses about stormwater when we visit them and give them as much info as possible, but it is not our main work.

Ensure that project management is adequately and appropriately staffed/supported. This was an “OK” experience but could have been more productive for all. Some of this was due to the prior PM at Ecology. Deadlines for data management issues, deliverables, and policy decisions were too often late or absent. However....this wasn’t a “failure” and should be viewed as a learning experience. Many local jurisdictions/staff have substantial experience and are interested in participating in these kinds of projects. Multimedia campaigns are, in my opinion, more effective than single-media or single-regulation interactions; technical assistance and/or incentive-based programs are reasonable in most circumstances and can be effective when done correctly.

I like the model of assessing an industry statewide, based on before and after technical assistance work. This provides a reasonable way to identify a baseline and track progress of an industry type, and subsequently to compare industry groups either with other states or with other industries within Washington. I’d like to see Ecology/EPA lead this comprehensive effort (funding, industry outreach, technical assistance and BMP development, project management, additional incentives...), with local staff (EnviroStars, Local Source Control, Moderate Risk Waste, Stormwater) providing the on-site assessment, business assistance, and implementing the incentives.

It took a lot more time and money than LSC, and I don’t think it accomplished very much.

It was a good step working with small businesses and trying to bridge the relationships between small businesses and government. I think if we keep doing projects like this and one-on-one assistance, we can build trusting and sustainable relationships that will benefit all parties involved but most important our environment.

The individual who conducted the ERP visits is no longer employed at my organization, so feedback on the program is difficult to supply at this time.

Thank you for the opportunity to comment.

No. [2 respondents]

None. [2 respondents]

Not applicable.

Appendix E. Phone Interview Guides and Survey Instruments

Phone Interview Guide for Participating Auto Body Businesses Evaluation of Ecology's ERP Pilot Project

Survey Introduction

Respondent Business: _____ *[from spreadsheet]*

Contact Name: _____

Hello, this is _____ calling to learn about your experience with the recent **Auto Body Pilot Project**.

1. May I please speak with _____ [name on list] [if contact no longer works there or not available long-term, then ask for owner / manager]?
 - a. Yes
 - b. Not available at this time *[Schedule for callback/leave message.]*
 - c. No *[Ask about better time to reach appropriate person or alternative contact person; thank.]*
 - d. Don't know or refused *[Thank you very much for your time today. Have a good day.]*

This is not a sales or regulatory call. We are helping the Department of Ecology review the pilot project and understand how to better assist businesses in the future. Your responses are strictly confidential, and no comments linked to individual businesses will be reported. The survey should take about 5 to 7 minutes.

Recall of the Auto Body Pilot Project

2. Do you recall the **Auto Body Pilot Project**? *[Prompt only if needed: The Pilot Project helped auto shops meet air, water, and hazardous waste requirements through assistance, incentives, and self-certification.]*
 - a. Yes
 - b. No *[Confirm with prompt; if not recalled, thank and end survey]*
 - c. Don't know or refused *[Thank and end survey]*

Thank you. Now I'm going to ask you a few questions about the Pilot Project.

Satisfaction and Suggestions

3. How did you learn about the Pilot Project? *[do not read list, select all that apply]*
 - a. Inspector came to my shop for a site visit
 - b. Letter/mailling
 - c. Industry association
 - d. Website/internet
 - e. Word-of-mouth

- f. News article
 - g. Other (specify: _____)
 - h. Don't know or refused
4. Please rate your satisfaction with the following elements of the Auto Body Pilot Project on a scale of 1 to 5, where 1=very dissatisfied and 5=very satisfied.
- a. **Site visits.** *[Explain if needed: In the site visits, someone from your local government came to your shop and filled out a checklist to assess current practices and identify areas for improvement.]*
 1=very dissatisfied 2 3 4 5=very satisfied Don't know/Not applicable
 - b. **Self-certification process.** *[Explain if needed: Auto body shops could fill out a self-certification form to assess current practices, identify areas for improvement, and become certified as an EnviroStars business.]*
 1=very dissatisfied 2 3 4 5=very satisfied Don't know/Not applicable
 - c. **Technical assistance materials.** *[Explain if needed: The Pilot Project provided materials including a Technical Assistance Manual, DVD, CD, and website to help auto body shops improve their environmental performance.]*
 1=very dissatisfied 2 3 4 5=very satisfied Don't know/Not applicable
 - d. **Response letters or e-mails regarding actions needed.** *[Explain if needed: The Pilot Project sent follow-up communications identify the steps auto shops needed to take to come into compliance with regulations.]*
 1=very dissatisfied 2 3 4 5=very satisfied Don't know/Not applicable
5. What **challenges** did your shop experience in participating in the Pilot Project? *[do not read list, select all that apply]*
- a. Took too long
 - b. Too complicated/confusing
 - c. Inconvenient
 - d. Did not address our concerns
 - e. Assistance was not helpful
 - f. Not interested
 - g. Cost
 - h. Other (specify: _____)
6. What **benefits** has your business experienced from participating in this pilot project? *(open-ended, code later)*
- a. Saved money
 - b. Came into compliance
 - c. Learned what we should be doing
 - d. Did the right thing
 - e. Moved beyond compliance
 - f. Other (specify: _____)

7. The Auto Body Pilot Project was designed to help businesses comply with environmental regulations for air, water, and hazardous waste. In the future, would you prefer a single program that covers all three areas, or separate programs focused on each area?
 - a. Single program addressing air, water, and hazardous waste
 - b. Separate programs focused on each area
 - c. Don't know
 8. How do you recommend improving the Auto Body Pilot Project?
-

Motivations, Incentives, and Benefits

9. [*“Self-certification” businesses only*] Did the ability to satisfy **the notification requirements for EPA’s new area source rule for paint stripping and coatings** motivate you to complete the self-certification?

[Explain further if needed: The U.S. Environmental Protection Agency’s “6H” area source rule addresses toxic air pollutants from paint stripping and surface coatings at auto body shops and takes effect in January 2011. Submitting a self-certification form counted as the Initial Notification to EPA. Depending on the shop’s practices and responses, the signed self-certification form could also count as the Notification of Compliance to EPA.]

- a. Yes
 - b. No
 - c. Don't know/not applicable
10. [*“Self-certification” businesses only*] Did the opportunity to **become an EnviroStars business** motivate you to complete the self-certification?
 - a. Yes
 - b. No
 - c. Don't know/recall
11. Which of the following incentives would encourage your shop to participate in a voluntary compliance program in the future? [*read list, select all that apply*]
 - a. Free on-site technical assistance
 - b. **Financial assistance implementing voluntary changes**
 - c. Regulatory flexibility [*Explain if needed: Would let an auto body shop meet the goal of a regulation using an alternative method not listed in the regulation. For example, Pilot Project participants met their EPA air reporting requirement without needing to submit forms directly to the EPA.*]
 - d. Reduced inspections
 - e. Public recognition
 - f. Other (specify: _____)

12. [If “financial assistance” (b) in previous question] Which form of financial assistance would be most helpful? [select one]
- a. Grants
 - b. Equipment vouchers
 - c. Fee waivers
 - d. Tax breaks
 - e. Other (specify: _____)

Water-borne Paint Systems

(optional question as time allows)

13. Is your shop considering investing in a water-borne paint system in the next 1–3 years?
- a. Yes
 - b. No
 - c. We currently use a water-borne paint system
 - d. Don’t know/refused

Comments and Suggestions

14. Do you have any other comments or suggestions about the Auto Body Pilot Project?
-

Thank you very much for time and feedback to help improve services for businesses.

Phone Survey for Non-participating Auto Body Businesses Evaluation of Ecology's ERP Pilot Project

Survey Introduction

Hello, this is _____ calling to learn about your decision not to participate in the recent Auto Body Pilot Project to help shops meet air, water, and hazardous waste requirements.

May I please speak with the shop manager?

- a. Yes
- b. Not available at this time *[Schedule for callback/leave message.]*
- c. No *[Ask about better time to reach appropriate person or alternative contact person; thank.]*
- d. Don't know or refused *[Thank you very much for your time today. Have a good day.]*

This is not a sales or regulatory call. We are helping the Department of Ecology review the Pilot Project and understand how to better assist businesses in the future. Your responses are confidential, and no comments linked to individual businesses will be reported. The survey should take only 2 to 3 minutes.

Respondent Business: _____ *[from spreadsheet; not a question]*

Recall of the Auto Body Program

1. Do you recall being contacted about the **Auto Body Pilot Project** by the Department of Ecology or someone from a local government? *[Prompt only if needed: The Pilot Project helped auto shops meet air, water, and hazardous waste requirements through assistance, incentives, and self-certification.]*
 - a. Yes
 - b. No *[Thank and end survey.]*
 - c. Don't know or refused *[Thank and end survey.]*

Thank you. Now I'm going to ask you a few questions about the Pilot Project.

Satisfaction and Suggestions

2. How did you learn about the Pilot Project? *[Do **NOT** read list, select all that apply]*
 - a. Inspector came to my shop for a site visit
 - b. Letter/ mailing
 - c. Industry association
 - d. Website/internet
 - e. Word-of-mouth
 - f. News article
 - g. Other (specify: _____)
 - h. Don't know or refused

3. I understand that you didn't participate, but did any elements of the Pilot Project sound useful for your business? *[open-ended, **prompt with list below if needed**, select all that apply]*
- Self-certification process
 - Site visits/on-site technical assistance
 - Technical assistance manual and materials
 - Training workshops
 - EnviroStars certification
 - Ability to satisfy EPA reporting requirements for new air quality rules
 - Other (specify: _____)
4. What prevented your shop from participating in the Pilot Project? *[do **NOT** read list, select all that apply]*
- Took too long/too busy/takes time away from doing work
 - Too complicated/confusing
 - Not interested
 - Inconvenient
 - Did not address our concerns
 - Assistance was not helpful
 - Cost
 - Don't trust government
 - Other (specify: _____)

Motivations, Incentives, and Benefits

5. Which of the following incentives would have encouraged your shop to participate in this Pilot Project? *[**READ** list, select all that apply]*
- Financial assistance implementing voluntary changes
 - Regulatory flexibility *[Explain if needed: Would let an auto body shop meet the goal of a regulation using an alternative method not listed in the regulation. For example, Pilot Project participants met their EPA air reporting requirement without needing to submit forms directly to the EPA.]*
 - Reduced inspections
 - Public recognition
 - Other (specify: _____)
6. *[If "financial assistance" (b) in previous question—use skip logic]* Which form of financial assistance would be most helpful? *(select one)*
- Grants
 - Equipment vouchers
 - Fee waivers

- d. Tax breaks
- e. Other (specify: _____)

Comments and Suggestions

- 7. Do you have any final comments or suggestions about the Auto Body Pilot Project?

- 8. For verification purposes, could I please have your name and title? (Your responses are confidential.)
[not essential to obtain this information if the respondent declines]

Respondent Name: _____

Respondent Position/Title: _____

Thank you very much for your time and input.

Web-based Survey for Project Team Evaluation of Ecology’s ERP Auto Body Pilot Project

This survey instrument is designed to gather information through a web-based survey of the agency staff members that participated in the ERP Auto Body Pilot Project. The survey will help assess the effectiveness of the Pilot Project, identify its overall benefits and challenges, and contribute to recommendations for future business outreach efforts.

Cascadia will conduct a web-based survey of the project team, including Local Source Control Specialists, EnviroStars leads, Ecology team members, and representatives of the U.S. Environmental Protection Agency.

Survey Introduction

Auto Body Pilot Project team member:

Please fill out this survey to help evaluate Washington State’s Auto Body Pilot Project.

The Department of Ecology hired Cascadia to help evaluate the program. Cascadia will receive, review, and compile the results. Your responses will remain confidential, and no personally identifiable information will be shared with Ecology. We understand that you may have completed a previous survey during the Pilot Project; this study is a follow-up effort now that the Pilot Project has concluded.

Your candid responses will help improve future outreach efforts. The survey should take about 10 to 15 minutes to complete. Thank you!

1. What was your role in the Auto Body Pilot Project?
 - a. Local Source Control Specialist
 - b. EnviroStars lead
 - c. Ecology staff member
 - d. USEPA Air team member
 - e. Other (specify: _____)

2. How interested would you be in participating in a sector-based, voluntary compliance effort like the Pilot Project in the future?
 - a. Very interested
 - b. Somewhat interested
 - c. Neutral
 - d. Somewhat uninterested
 - e. Very uninterested

3. In general, would you prefer a single program that covers air, water, and hazardous waste, or separate programs focused on each area?
 - a. One multi-media program addressing air, water, and hazardous waste
 - b. Separate programs focused on each regulatory area
 - c. Don't know

4. In general, would you prefer a program targeted to a single sector (such as auto body shops) or a broader approach (such as all small businesses)?
 - a. Targeted, single-sector program
 - b. Broader, multi-sector program
 - c. Don't know

Project Elements

5. Please rate your satisfaction with the following elements of the Auto Body Pilot Project on a scale of 1 to 5, where 1=very dissatisfied and 5=very satisfied.

a. Site visits and checklist	1=very dissatisfied	2	3	4	5=very satisfied
b. Self-certification process	1=very dissatisfied	2	3	4	5=very satisfied
c. Technical assistance materials	1=very dissatisfied	2	3	4	5=very satisfied
d. Project promotion	1=very dissatisfied	2	3	4	5=very satisfied
e. Interagency coordination	1=very dissatisfied	2	3	4	5=very satisfied

6. How could the **site visits and checklist** be improved?

7. How could the **self-certification process** be improved?

8. How could the **technical assistance materials** be improved?

9. How could **project promotion** be improved?

10. How could **interagency coordination** be improved?

Other Opportunities for Improvement

11. What, if any, challenges not addressed above did you experience in participating in the Pilot Project?

12. What are your suggestions for applying lessons learned from the Auto Body Pilot Project to improve similar future programs?

13. Do you have any other comments on this project?

Phone Survey for Auto Body Industry Associations and Paint Vendors Evaluation of Ecology’s ERP Pilot Project

This survey instrument is designed to gather information through phone interviews with auto body businesses to help assess the effectiveness of the ERP Auto Body Pilot Project, identify its overall benefits and challenges, and yield recommendations for future business outreach efforts.

Cascadia will interview Pilot Project participants (both EnviroStars businesses and otherwise) and businesses that declined to participate in the Pilot Project; specifically, we will attempt to conduct interviews with the following number of businesses in each category:

- 12–18 Pilot Project participants—businesses that completed the ERP self-certification.
- 12–18 Pilot Project participants—businesses that had a site visit (baseline or verification visit) but did not complete the ERP self-certification.
- 12–15 businesses that declined to participate in the Pilot Project.
- 2–5 auto body industry association board members (modified survey).
- 2–4 auto body paint vendors (modified survey).

At the start of surveying, Cascadia will pretest the survey instrument for **businesses** with a small initial sample to ensure that it works well, is easily understood, and obtains the results needed for analysis. After making any needed revisions, Cascadia will conduct phone interviews with the targeted businesses and industry associations in the participating jurisdictions. Multiple calls may be needed to reach a targeted business and complete each interview. Cascadia will make up to three attempts to reach each contact. Interviews with businesses are expected to be 6-10 minutes in length for pilot project participants, coupled with much shorter phone surveys (less than 5 minutes) for non-participants.

Cascadia will also conduct phone interviews using a modified survey with board members of **industry associations** and **auto body paint vendors**.

The interviewers will obtain primarily qualitative information from businesses regarding their experience with ERP or their reasons for non-participation as well as their response to potential incentives. Cascadia will prepare brief written summaries to document and summarize the completed interviews in each group.

Survey Introduction

Respondent industry association or auto body paint vendor: _____

Contact Name: _____

Hello, this is _____ calling to learn about your experience with the Department of Ecology’s recent **Auto Body Pilot Project**.

May I please speak with _____ [name on list] [if contact no longer works there or not available long-term, then ask for owner / manager]?

- a. Yes
- b. Not available at this time [Schedule for callback/leave message.]
- c. No [Ask about better time to reach appropriate person or alternative contact person; thank.]
- d. Don't know or refused [Thank you very much for your time today. Have a good day.]

This is not a sales or regulatory call. We are helping review the pilot project and understand how Ecology can better assist businesses in the future. Your responses are strictly confidential, and no comments linked to individual organizations will be reported. The survey should take about 5 minutes.

Recall of the Auto Body Pilot Project

1. Do you recall the **Auto Body Pilot Project**? [Prompt only if needed: The Pilot Project helped auto shops meet air, water, and hazardous waste requirements through assistance, incentives, and self-certification.]
 - a. Yes
 - b. No [Confirm with prompt; if not recalled, thank and end survey]
 - c. Don't know or refused [Thank and end survey]

Thank you. Now I'm going to ask you a few questions about the Pilot Project.

Satisfaction and Suggestions

2. How did you learn about the Pilot Project? [do not read list, select all that apply]
 - a. Contacted by Ecology or other government representative
 - b. Letter/mailing
 - c. Industry association
 - d. Website/internet
 - e. Word-of-mouth
 - f. News article
 - g. Other (specify: _____)
 - h. Don't know or refused
3. Please rate your satisfaction with the following elements of the Auto Body Pilot Project on a scale of 1 to 5, where 1=very dissatisfied and 5=very satisfied.
 - a. **Site visits.** [Explain if needed: In the site visits, someone from the local government visited auto body shops and filled out a checklist to assess current practices and identify areas for improvement.]

1=very dissatisfied	2	3	4	5=very satisfied	Don't know/Not applicable
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b. **Self-certification process.** *[Explain if needed: Auto body shops could fill out a self-certification form to assess current practices, identify areas for improvement, and become certified as an EnviroStars business.]*

1=very dissatisfied 2 3 4 5=very satisfied Don't know/Not applicable

c. **Technical assistance materials.** *[Explain if needed: The Pilot Project provided materials including a Technical Assistance Manual, DVD, CD, and website to help auto body shops improve their environmental performance.]*

1=very dissatisfied 2 3 4 5=very satisfied Don't know/Not applicable

d. **Response letters or e-mails regarding actions needed.** *[Explain if needed: The Pilot Project sent follow-up communications identify the steps auto shops needed to take to come into compliance with regulations.]*

1=very dissatisfied 2 3 4 5=very satisfied Don't know/Not applicable

4. What **challenges** did **your organization** experience in participating in the Pilot Project? *[do not read list, select all that apply]*

- a. Took too long
- b. Too complicated/confusing
- c. Inconvenient
- d. Did not address our concerns
- e. Assistance was not helpful
- f. Not interested
- g. Cost
- h. Other (specify: _____)

5. What **challenges or complaints** did you hear from **auto body shops** regarding the Pilot Project? *[do not read list, select all that apply]*

- a. Took too long
- b. Too complicated/confusing
- c. Inconvenient
- d. Did not address our concerns
- e. Assistance was not helpful
- f. Not interested
- g. Cost
- h. Other (specify: _____)

6. What **benefits** do you think auto body shops experienced from participating in this pilot project? *(open-ended, code later)*

- a. Saved money
- b. Came into compliance
- c. Learned what they should be doing
- d. Did the right thing
- e. Moved beyond compliance
- f. Other (specify: _____)

7. The Auto Body Pilot Project was designed to help businesses comply with environmental regulations for air, water, and hazardous waste. In the future, would you prefer a single program that covers all three areas, or separate programs focused on each area?
 - a. Single program addressing air, water, and hazardous waste
 - b. Separate programs focused on each area
 - c. Don't know
 8. How do you recommend improving the Auto Body Pilot Project?
-

Motivations, Incentives, and Benefits

9. Which of the following incentives do you think would encourage an auto body shop to participate in a voluntary compliance program in the future? *[read list, select all that apply]*
 - a. Free on-site technical assistance
 - b. Financial assistance implementing voluntary changes
 - c. Regulatory flexibility [Explain if needed: Would let an auto body shop meet the goal of a regulation using an alternative method not listed in the regulation. For example, Pilot Project participants met their EPA air reporting requirement without needing to submit forms directly to the EPA.]
 - d. Reduced inspections
 - e. Public recognition
 - f. Other (specify: _____)
10. *[If "financial assistance" (b) in previous question]* Which form of financial assistance do you think would be most helpful? *[select one]*
 - a. Grants
 - b. Equipment vouchers
 - c. Fee waivers
 - d. Tax breaks
 - e. Other (specify: _____)

Water-borne Paint Systems

11. Do you recommend that auto body shops consider investing in a water-borne paint system in the next 1–3 years?
 - a. Yes
 - b. Sometimes/depends *[explain]*
 - c. No
 - d. Don't know/refused

Comments and Suggestions

12. Do you have any other comments or suggestions about the Auto Body Pilot Project?

Thank you very much for time and feedback to help improve services for businesses.