



2018 ANNUAL SBEAP/SBO Training

April 30 – May 3, 2018 in Alexandria, Virginia

Small Business Environmental Assistance Program (SBEAP) □ Small Business Ombudsman (SBO)

I. Introduction

The 1990 Clean Air Act Amendments (CAAA) established Section 507 and its guidelines for implementation. Section 507 of the CAAA requires that each state create a small business technical and environmental compliance assistance program (State 507 Programs). According to the EPA's Guidelines for Implementation of Section 507 of the 1990 Clean Air Act Amendments, each state program is required to consist of three parts: a Small Business Ombudsman (SBO)¹; a Small Business Environmental Assistance Program (SBEAP)²; and a Compliance Advisory Panel (CAP)³.

Separately, small businesses are considered minor pollution sources; however, collectively they can produce more pollution than a "big" emitter. Unlike "big" emitters, small businesses often lack the resources needed to comply with environmental regulations. State 507 Programs play an important role in helping small businesses comply with air quality requirements by providing free and confidential regulatory compliance assistance information and resources.

In 1995, the state 507 Programs established the SBEAP/SBO National Steering Committee (NSC), a national network of 507 Programs. The mission of the NSC is "to serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration." The NSC members include at least one 507 Program SBEAP/SBO representative (and an alternate) from each of the ten Environmental Protection Agency (EPA) regions.

The 507 Programs vary state by state in how they define a small business and to whom they provide services. To improve communication amongst program assistance providers and encourage networking within the small business environmental assistance community, 507 Programs often arrange and/or participate in educational and promotional activities, such as training and workshops.

¹ An SBO is an advocate for small business owners or operators within the regulatory environment.

² An SBEAP is designed to provide detailed environmental and technical assistance to small businesses, when needed.

³ A CAP provide feedback on the effectiveness of the SBEAPs and help and address identify small business issues/obstacles.

The 2018 SBEAP/SBO Annual Training (conference) was held the week of April 30, 2018, and largely focused on environmental regulations and the small business perspective. The training was hosted and supported by EPA's Asbestos and Small Business Ombudsman (ASBO) team, located in the Office of Small and Disadvantaged Business Utilization (OSDBU). This annual training gives organizations, like the NSC, EPA and the US Small Business Administration (SBA) a platform to report recent activities and updates. The training also provides an opportunity for the small business environmental assistance community to network and establish or strengthen contacts; learn about initiatives, identify applicable and available resources and funding opportunities.

The purpose of this report is to provide an overview of the training. This report details the planning efforts and facilitation of the training and summarizes the learning objectives and outcomes. This report also includes a summary of collected post-training evaluation questionnaires.

II. 2018 SBEAP/SBO Annual Training Planning

Planning and Management Team

The planning and implementation of the annual training is a joint effort by EPA and state 507 Programs. The EPA's ASBO played an important role in the planning process. The ASBO financed the training, provided logistical support (including venue selection), and assisted the Planning Subcommittee as needed. EPA contractors, SC&A Inc. (SC&A) were responsible for overseeing the logistics of the training and providing meeting support. Key players involved in the planning and aiding to the success of the annual training included:

Jennifer Collins, Indiana DEP PPCA
Paula Hoag, EPA ASBO Team
Nancy Larson, K-State PPI SBEAP
Joan Rogers, EPA ASBO, OSDBU Deputy Director
Susan Tripp, VA OSBA

As part of the planning process, the NSC Planning Subcommittee was formed to ensure the training's goals met the needs of the small business environmental assistance provider community. Planning team members were tasked with: delegating logistical duties; securing speakers; finalizing the training agenda (e.g., identifying applicable topics); and identifying which training sessions would be available in-person and/or by webinar.

Planning Subcommittee meetings were held every two weeks and led by Jennifer Collins from Indiana Department of Environmental Management (IDEM). Members of

the Planning Subcommittee included Regional SBEAP representatives, other subcommittee representatives (including the NSC members), contractors and the EPA.

Training Location

The Crowne Plaza Old Town Alexandria, located at 901 North Fairfax Street in Alexandria, VA, was selected to host the 2018 SBEAP/SBO Annual Training for Days 1 and 2 of the training (Tuesday, May 1st and Wednesday, May 2nd). More than 22 hotels were contacted in the Washington, D.C., Arlington, Virginia and Alexandria, Virginia areas. Hotels were evaluated, and a selection was made based on availability (i.e., was the meeting room available over the preferred meeting dates and was per diem or a discounted room rate offered) and proximity to EPA’s campus, the Ronald Reagan Airport (DCA), public transportation (the metro), and restaurants and shops.

On Day 3 of the training (Thursday, May 3rd), the EPA hosted the Administrator’s 28th Annual Small Business Programs Awards Ceremony. All attendees were encouraged to attend the ceremony that was held in the morning at the U.S. EPA William Jefferson Clinton East Building (WJCEB) located at 1301 Constitution Ave N.W. in Washington, D.C. In the afternoon, the meeting continued in this building, with key EPA speakers providing presentations.

Registered Attendees

Over 50 people registered to participate in the training, including more than 20 representatives from states. Attendees participating in the training represented federal, state and local air agencies, small business program assistance providers, small business owners and trade associations, and related small business non-governmental organizations (NGOs). A breakdown of attendees by stakeholder group is presented below, and a complete list of attendees is available in the Appendix.

<u>Affiliation</u>	<u>No. of attendees</u>
Business/Trade Associations	5
EPA (Headquarters, Regional and RTP Staff)	15
State/Local Air Agency	24
Federal Agency (Non-EPA)	1
NGOs (nonprofits and universities)	5
State Programs (SBEAP and SBOs)	8
Other (contractors)	2

Training Agenda

Below is a simplified version of the training agenda, followed by descriptions of the training sessions and presentations. The full agenda is available in the Appendix.

2018 SBEAP/SBO Annual Training Agenda – Simplified Version

Day	Time	Session
Pre-Training Monday, April 30 th	Evening	<ul style="list-style-type: none"> Pre-Training Event: NSC Steering Committee Meeting and Dinner and Newcomer – Mentor Mixer
Day One Tuesday, May 1 st	Morning	<ul style="list-style-type: none"> Welcome Update from EPA OSDBU Meet and Greet Newcomers Education Session: Review of Annual Report Data
	Afternoon	<ul style="list-style-type: none"> Technical Air Session: Once In Always In Promotional Session: Marketing with No or Little Budget: What can we learn from each other?
	Evening	<ul style="list-style-type: none"> State Networking Reception: NSC Tradition
Day Two Wednesday, May 2 nd	Morning	<ul style="list-style-type: none"> NSC Session: NSC Year in Review June 1, 2017 – May 31, 2018 Educational Session: EPA’s E-Enterprise for the Environment Update from SBA Office of Advocacy
	Afternoon	<ul style="list-style-type: none"> Website Session: Website Review Technical Air Session: Pollution Prevention/Compliance Assistance Integration-promoting Sustain able Behaviors. Trade Associations Panel Discussion
	Evening	<ul style="list-style-type: none"> State SBEAP/SBO: State Awards Ceremony
Day Three Thursday, May 3 rd	Morning	<ul style="list-style-type: none"> EPA Small Business Administrator’s Awards Ceremony
	Afternoon	<ul style="list-style-type: none"> EPA Presentation: Introduction to EPA Smart Sectors Program EPA Presentation: Making Connections – How can SBEAPs work with OAR TSCA Updates City Sights – DC Tour

III. Summary of 2018 SBEAP/SBO Annual Training Sessions

Pre-Training Event (Monday, April 31st)

NSC Steering Committee Meeting and Dinner and Newcomer – Mentor Mixer

The NSC hosted a pre-training working dinner at T.J. Stones, a restaurant in Alexandria, VA. All 507 Program representatives, EPA staff, and any other interested parties were encouraged to attend. The purpose of this event was to learn more about the NSC and connect “newcomers” with existing members or mentors.

Day 1 Sessions (Tuesday, May 1st)

Welcome: Joan B. Rogers, Deputy Director, EPA OSDBU and ASBO

Ms. Rogers welcomed and thanked attendees for participating in the 3-day training. Ms. Rogers gave a special thanks to the Planning Subcommittee members and its facilitator, Ms. Collins, who were instrumental in planning and organizing the training. Members were reminded that Tony Pendola will no longer be the NSC Chair. Ms. Lisa Ashenbrenner-Hunt, Small Business Environmental Assistance Specialist for Wisconsin Department of Natural Resources (DNR), has been selected to replace Mr. Pendola as Chair. The position of Vice Chair is vacant. Anyone interested in filling the position should notify Mr. Pendola or Ms. Ashenbrenner-Hunt.

Ms. Rogers provided a brief update on the current activities and events being held by the EPA OSDBU in honor of National Small Business Week, held April 29-May 5, 2018.

Update from the OSDBU: Joan B. Rogers, EPA OSDBU and ASBO

National Small Business Week highlights outstanding entrepreneurs and members of the small business community. Other announcements made included:

- EPA Administrator Scott Pruitt has voiced his support for small business programs and initiatives.
- As of April 12th, Andrew Wheeler is the new Deputy Administrator for the Office of the Administrator.
- Henry Darwin, Chief of Operations (COO) for the Office of the Administrator deployed a 3-part Lean Management System that has improved communication, public outreach and program efficiency. The Lean Management System consists of setting targets, standardizing work and conducting progress reviews.

Meet and Greet Newcomers: Jeremy Hancher, Pennsylvania Environmental Management Assistance Program

Mr. Hancher hosted a speed networking event that allowed SBEAP members the opportunity to introduce themselves to each other and question members about their programs. The format of the speed networking event was typical to a round robin. Each attendee was given 4 opportunities, at 5 minutes each, to network and meet other SBEAP members and small business community representatives. To help break the ice, participants were provided a "Speed Networking" sheet with a series of open-ended questions, such as "How did you get involved in SBEAP?"

Educational Session: Review of Annual Report Data – Jennifer Collins, Pollution Prevention and Compliance Assistance, Indiana Department of Environmental Management (IDEM) and Nancy Larson, Pollution Prevention Institute Small Business Environmental Assistance Program, Kansas State University

This session provided an overview of the SBO/SBEAP Annual Report and an update on the status of the Annual Report flyer. State SBEAPs have been collecting data from SBEAPs/SBOs beginning in 2016 on program outcomes and narratives to show the effectiveness of the programs. In 2017, 42 programs representing 38 states submitted data for inclusion in the report for the year 2016. Concerned that the information presented in the 2016 report is already dated, members were asked to consider modifying when data is collected (in January for CY or FY 2018), determine when the best time during the year is to collect data (in January, spring or fall) and how the information is quantified so the report, when published, includes the most recent information.

A draft Annual Report flyer is available for review. Information presented in the flyer includes, for example, a description of how SBEAP programs work, who can benefit from SBEAP programs, and success stories/case studies. A template of this flyer is available and can be tailored by states to promote their environmental assistance programs.

Technical Air Session: Once In Always In (OIAI) – Tony Pendola, Small Business Ombudsman/SBEAP, North Carolina Department of Environmental Quality (NCDEQ)

This session provided an overview of EPA's OIAI policy for major sources of hazardous air pollutants (HAPs) subject to maximum achievable control technology (MACT) standards under the CAAA. Attendees learned about its history, reviewed arguments against the OIAI policy, and collectively identified the implications and benefits of the EPA's decision to reverse its OIAI policy.

Mr. Pendola noted that many small businesses have suggested the OIAI policy discourages emission reductions, because it does not consider recent improvements made by a company/business; even if these improvements limit the potential to emit (PTE) HAPs below the major source thresholds. He stated that it is unknown whether reversing this policy will result in an increase or a decrease in emissions. He also mentioned that while the removal of this rule will likely benefit several small businesses, some unexpected problems may occur, such as less revenue generated for states from permit fees and changes to a businesses' tax deductions and credits.

Promotional Session: Marketing with No or Little Budget: What can we learn from each other? – SBEAP/SBO Panel Members

This session looked at the successes, failures and lessons learned by SBEAPs when developing their promotional/outreach materials and marketing their program with limited resources. A panel of six speakers, each representing a different SBEAP/SBO, presented an overview of their programs and offered examples of tools/resources that are available to the SBEAP/SBO community at little to no cost. Speakers also presented a number of lessons learned and advised attendees on the best approaches to avoid making mistakes. A sample of tools/resources and advice offered included:

- Market the problem, not the program.
- Build partnerships. Establish and maintain relationships with trade associations and field inspectors, both are great resources for promoting a program.
- Cross-market. Promote programs using existing resources, like the Small Business Resource Magazine.
- Maximize presence on social media. Social media platforms, like Facebook, Twitter and Linked-In offer many hassle-free tools designed to attract customers and simplify communication between businesses/program assistance providers and their followers (potential and existing customers).
- Evaluate the effectiveness of existing promotional materials. Review current marketing materials, like brochures and websites, for approachability and messaging. Look at other states' marketing materials for ideas.

State Networking Reception: NSC Tradition

The NSC hosted its annual state network reception the evening of May 1, 2018. This reception provided SBEAP/SBO members with an opportunity to network informally. As part of the reception, participating SBEAP/SBO members were asked to bring a gift valued at \$15 that represents their state. During the reception, members were called one at a time to select a gift and guess which state it represented. This reception provided an opportunity to interact with colleagues in a fun, casual setting.

Day 2 Sessions (Tuesday, May 2nd)

NSC Session: NSC Year in review June 1, 2017 through May 31, 2018 – Tony Pendola, SBO/SBEAP, NCDEQ and Lisa Ashenbrenner Hunt, Small Business Environmental Assistance Specialist, Wisconsin Department of Natural Resources

This session focused on the accomplishments and works in progress by the NSC and solicited advice from SBEAP/SBO members on potential strategies, activities and opportunities available to strengthen the NSC. During this session members were asked to break into smaller groups of 4 or 5 and review a list of 13 possible areas of emphasis for the NSC 2018-2020 planning period. Each group was tasked with evaluating its selected area(s) of focus and encouraged to brainstorm ways to achieve desired outcomes. Table 1 identifies the areas selected by training participants for NSC to prioritize and a snap shot of the examples provided on how to meet desired goals.

Table 1. Suggestions for NSC Areas of Emphasis and How to Achieve These Goals

Possible Areas of Emphasis for NSC 2018-2020	How to Achieve Desired Outcome
Developing Relationships with EPA offices (OAQPS, OECA, etc.)	<ul style="list-style-type: none"> • Reestablish compliance assistance positions at the regional level. • Reexamine language used in letters sent by OECA to the small business community for approachability
Building ties with small business entities/assistance providers	<ul style="list-style-type: none"> • Identify, via survey, ways assistance providers contact clients and make information publicly available.
Cross-promoting our programs	
Engaging states that don't participate in national groups	<ul style="list-style-type: none"> • Identify states with SBEAPs that do not participate in national groups. • Determine what states have programs. For states lacking SBEAP, determine what resources are needed to create a program.
States that don't have all three aspects of program	<ul style="list-style-type: none"> • Determine why states are lacking one or more of the "required" components of a 507 Program.
Regulatory reform – what regulations are important to us?	<ul style="list-style-type: none"> • Identify "actions" that the small business community can do once the comment period has closed to ensure that the perspectives of small businesses are considered during the rulemaking process. • Review regulatory roadblocks to environmental issues.

Possible Areas of Emphasis for NSC 2018-2020	How to Achieve Desired Outcome
EPA Regional Liaisons	<ul style="list-style-type: none"> • Advocate to reestablish regional liaisons. Liaisons are an efficient way to pass information from federal to state/local agencies and programs.
Working with trade associations	<ul style="list-style-type: none"> • Build trust and partnerships with trade associations and their members by participating in events, like expos, and encourage cross-promotion (link to each other's websites).
Funding sources	<ul style="list-style-type: none"> • Survey programs to identify current funding sources and request letters of support for grant funding opportunities.
Expanding programs to multimedia	<ul style="list-style-type: none"> • Conduct economic impact studies. • Generate support for key groups, including Environmental Council of the States, ECOS.

Educational Session: E-Enterprise for the Environment – Kelly Poole, ECOS

This session provided an overview of the E-Enterprise for the Environment project, a new model, based on the foundational work of the Environmental Information Exchange Network, for shared governance and cooperative federalism. The E-Enterprise focuses on streamlining processes and optimizing technology. During this session, Ms. Poole highlighted the characteristics of E-Enterprise projects and systems currently available to help states comply with requirements. For instance, the E-Enterprise Combined Air Emissions Reporting (CAER) project, seeks to streamline multiple emissions reporting processes and the State Planning Electronic Collaboration System (SPeCS), is an online system that allows state air agencies to submit their state implementation plans (SIPs) and any associated information electronically.

Update from SBA Office of Advocacy: Tayyaba “Tabby” Waqar, U.S. Small Business Administration, Office of Advocacy

Ms. Waqar gave an overview of the Office of Advocacy’s (Advocacy) role in the regulatory process for EPA rulemakings. Members learned about the history of Advocacy (why it was created and the regulatory reforms that helped strengthen it) and its purpose: to act as a watchdog for small businesses at the federal level; oversee agency compliance and provide regulatory assistance, specifically on the Regulatory Flexibility Act (RFA); and act as a liaison for the small business community.

Advocacy is currently supporting a number of roundtable discussions. These roundtable discussions provide a platform for small businesses facing regulatory burdens to voice their concerns (e.g., complying with potential to emit (PTE) requirements) and suggestions (e.g., eliminate redundant and dated regulations)

directly to regulators. Feedback obtained from these roundtable discussions is used by Advocacy in their report on existing small business regulatory burdens. More information about upcoming, recent and past roundtable discussions can be found on Advocacy's website. Anyone interested in participating in an upcoming roundtable discussion or would like to join Advocacy's "group list", please contact Ms. Waqar.

Website Session: Nancy Larson, Pollution Prevention Institute Small Business Environmental Assistance Program, Kansas State University

Ms. Larson used live interactive audience participating survey software to poll the attendees about NSBEAP website-related questions. Through this survey, participants were able to immediately see the group responses to questions. A list of the questions asked and the responses are presented in the Appendix.

Technical Air Session: Pollution Prevention/Compliance Assistance Integration-promoting Sustainable Behaviors – Dan Sowry, Ohio EPA's Compliance Assistance Program and Jennifer Collins, Pollution Prevention and Compliance Assistance, IDEM

This session focused on pollution prevention (P2) and compliance assistance for Indiana and Ohio small businesses and organizations. Ms. Collins provided a brief overview of the establishment of P2 laws and policies (1990 Pollution Prevention Act).⁴ Both presenters shared their state's P2 experiences (success stories and problems faced) and highlighted available state resources. In addition, presenters discussed the financial and environmental benefits to implementing P2 strategies and technologies, along with the steps for complying with P2 requirements. This session also addressed concerns pertaining to cross-media transfer of waste, the movement of pollution from one medium (air, water or land) to another, and the need to move away from a linear to a circular economy.

Trade Association Panel Discussion: Trade Associations Panel Members

This session centered around the importance of trade associations as a tool for small businesses and small business environmental assistance providers. A panel of five speakers each representing a different trade association presented for five minutes each on their industry sector. They reported trends (e.g., larger businesses are consuming smaller businesses), discussed industry success stories (e.g., a shift in technology has resulted in more industries embracing sustainability practices) and addressed regulatory obstacles faced by their members, like "Not in My Back Yard," NIMBY. Panelists also provided SBEAP

⁴ The Pollution Prevention Act established a national policy, implemented by the EPA, which requires that pollution be prevented or reduced at the source whenever feasible; pollution that can not be prevented or reduce should be recycled.

members and small businesses with suggestions on how to better establish and maintain relationships with trade association, like themselves. Some comments and suggestions offered included:

- Use trade associations as technical assistance providers. Many small businesses lack the technical staff or knowledge needed to comply with environmental regulations.
- Network. Depending on the industry sector, some trade associations have mailing lists and local chapters that small businesses can join.
- Self-Promote. Trade shows and trade associations' newsletters are free (or low-cost) marketing resources that are available to small businesses.

State SBEAP/SBO: State Awards Ceremony

The purpose of the annual SBEAP/SBO NSC Awards ceremony is to recognize outstanding achievements in environmental leadership within the small business community. Light refreshments were offered, and space was set aside for attendees to informally network. Awards presented, and awardees are listed below:

- Small Business Environmental Assistance Program
Sara Johnson, New Hampshire Small Business Technical Assistance Program
- Small Business Environmental Stewardship
Erin Cox, QA/QC Manager and Sustainability Coordinator for Great Divide Brewing Co.
- Business Assistance Provider Environmental Leadership
John Stier, Sustainability Mentor for Brewers Association
- Karen V. Brown Leadership
Tony Pendola, SBEAP/SBO, North Carolina Department of Environmental Quality

Day 3 Sessions (Wednesday, May 3rd)

EPA Small Business Administrator's Awards Ceremony

The annual EPA Small Business Administrator's Awards ceremony provides a platform for the EPA Administrator to recognize individuals, businesses and state/local small business assistance providers for their outstanding achievements and contributions throughout the year. Among the awards presented this year, Nancy Larson from Kansas State University Pollution Prevention Institute was recognized for outstanding accomplishments as a state small business environmental assistance provider.

EPA Presentation: Introduction to EPA Smart Sectors Program – Nena Shaw, EPA Office of Policy

Ms. Shaw gave an overview of the history of the EPA Smart Sectors Program, summarized Program activities and initiatives and discussed ways in which Sectors staff can work more closely with SBEAP/SBO members and the small business community. She noted that the primary purpose of EPA's Smart Sectors program is to encourage meaningful collaboration and facilitate dialog between regulators and regulated entities, such as the Aerospace or Automobile industry sectors. She also noted that the administration's support for the Smart Sectors program has led to a number of Agency reform efforts (affecting what the Agency does and how they do it), including the formation of a Regulatory Reform Task Force and assigning a group to address permitting streamlining. The Program is also expected to help improve communication and streamline operations internally at EPA through the institution of a lean management approach to reduce inefficiency and waste (non-value added processes) and maximize productivity. Ms. Shaw also provided a brief overview of the Agency's strategic plan, which consists of three objectives: meeting the Agency's core missions; enhancing cooperative federalism; and refocusing the Agency to the rule of law and processes (e.g., administering environmental laws as Congress intended and meeting the Agency's statutory obligations under the law).

EPA Presentation: Making Connections – How Can SBEAPs Work with OAR – Bill Wehrum, EPA Office of Air and Radiation (OAR)

This question and answer (Q&A) session gave attendees the opportunity to engage in conversation with and to ask questions directly to the presenter. Audience members found this format to be highly valuable. Mr. Wehrum expressed his appreciation for attendees and their comments, which provided him with a deeper understanding of some of the existing problems faced by the small business community. A list of comments and questions asked, and Mr. Wehrum's corresponding responses are available in the Appendix.

EPA Presentation: TSCA Updates – Susanna Blair, EPA Office of Chemical Safety and Pollution Prevention (OCSPP)

Ms. Blair briefly updated attendees on current and future efforts under the Toxic Substances Control Act (TSCA). As a result of the 2016 TSCA amendments⁵, the EPA has issued three framework rules to assess and manage chemicals under TSCA, including the prioritization rule, the risk evaluation rule and the fees rule. In addition, the Agency is currently conducting risk evaluations for the first 10 chemicals,⁶ drawn from the 2014 TSCA Work Plan and identified as high-priority substances. Ms. Blair explained the general requirements of each rule and the work underway for each. She also noted that the comment periods for some of

⁵ The Frank R. Lautenberg Chemical Safety for the 21st Century Act amended the TSCA.

⁶ A list of the first 10 chemicals identified as high-priority substances was published December 2016.

the actions under these rules are open or soon will be open, and training attendees are encouraged to submit any comments they may have on these actions.

City Sights – DC Tour

A double-decker bus tour of DC’s monuments was arranged, followed by an optional group dinner for interested parties. Tour fees ranged from \$40-\$50 per person.

IV. Training Feedback and Comments

2018 SBEAP/SBO Annual Training Evaluation

It is important to know whether the training met the needs and goals of participating attendees.

Attendees were given evaluation forms at the end of each training day and asked to evaluate that day’s events. The questions were broken into 2 parts: a range evaluation section (strongly agree to strongly disagree) and open-ended questions/written responses; for a total of 18 questions. Planning team members use feedback from evaluations forms to improve future trainings.

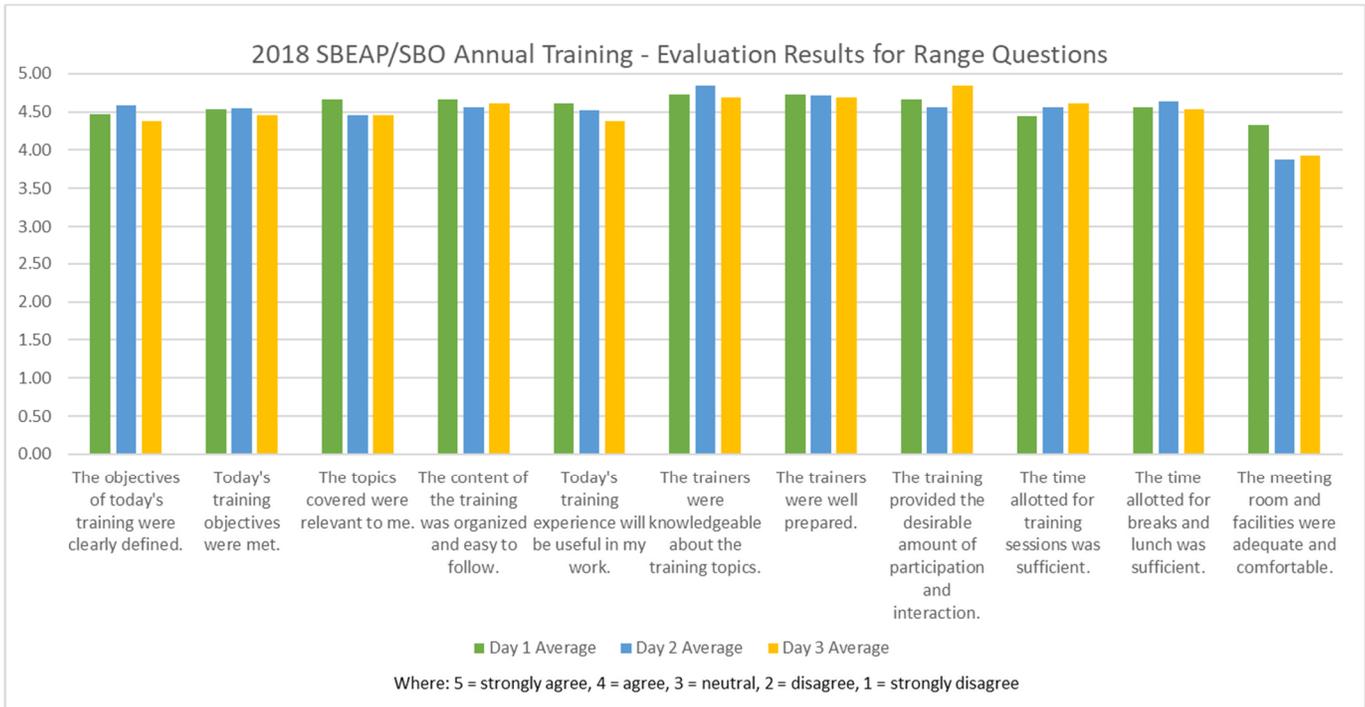
On average, 33% of onsite attendees submitted a survey per day; the majority coming from state partners. See Table 2 for a breakdown of the evaluations forms collected by stakeholder group.

Table 2. Breakdown of Survey Response Numbers by Stakeholder Group

Stakeholder Group	Day 1	Day2	Day 3
EPA	2	2	-
SBO	3	6	5
SBEAP	2	2	
state partner	3	4	3
SB coordinator	4	3	2
BEP	-	1	-
EPA contractor/grantee	-	1	-
Unknown/Other	4	6	3
Total No. of Surveys	18	25	13

As indicated in the chart below, nearly all evaluation forms collected indicated that the training did meet the objectives and goals set out by the Planning Subcommittee. Attendees agreed that the content, materials and resources offered were valuable, applicable and practical to SBEAP/SBO members and the small business community.

Six out of the 18 questions listed in the evaluation form were open-ended. When asked “what did you *like most* about today’s training” several respondents stated the speakers invited and the topics discussed. When asked “What aspects of today’s training could *be improved*?” a few respondents disliked the location of the meeting space and thermal temperature of the rooms, along with the layout of the agenda (not enough time for breaks/lunch). A complete list of questions and responses is available in the Appendix.



Summary of Attendee Comments and Recommendations

Over the course of the training, several similar comments and recommendations were made by attendees. These comments can be grouped and summarized into overall themes of comments and recommendations for SBEAPs and the EPA. Table 3 provides an overview of these comments and recommendations.

Table 3. Comments and Recommendations Made by Training Attendees

Summary of Comment or Recommendation	Comment or Recommendation Discussion at the Training
<i>Standardization and enforcement of the requirement to establish a state 507 Program, under the CAAA is important to the soundness of the rule.</i>	Training attendees discussed the mandate of the 1990 CAAA for states to develop programs aimed at helping small businesses comply with air quality regulations. They stated that many states lack 507 Programs, or their compliance assistance programs are incomplete (i.e., missing one or more of the required components). They further stated that it is important for the EPA to enforce Section 507 of the 1990 CAAA and validate that each program contains each required part (i.e., SBEAP, SBO and CAP). For states missing one or more of the

Summary of Comment or Recommendation	Comment or Recommendation Discussion at the Training
	<p>required components, they suggested the EPA should determine why it's missing. They also remarked that without strict enforcement, hiring staff to manage these programs becomes less of a priority, particularly during times when state funding is limited.</p>
<p><i>Building and maintaining relationships with involved parties is critical to promoting available programs and resources.</i></p>	<p>In promoting their programs, several training attendees stated that building strong, positive relationships with stakeholders, like inspectors and trade associations can greatly help to promote states' SBEAPs and establish trust between regulators and regulated entities. They noted that governmental regulators are often perceived as an impediment to small business profits and growth and that establishing relationships with trade associations can help improve communications between parties. They also mentioned that inspectors and trade associations regularly interact with small businesses, are knowledgeable of state regulatory assistance programs and can suggest these resources to their clients.</p>
<p><i>Filling or reinstating liaison positions will help improve communication between regulators and regulated entities.</i></p>	<p>Training attendees mentioned that positions, like EPA's Regional Small Business Liaisons and EPA Office of Air Quality Planning and Standards technical assistance providers are vital to SBEAPS in helping them effectively communicate correct information to small businesses. The Attendees further noted that liaisons are also the voice of small businesses during periods of regulatory reforms (or establishment); they ensure that small business' priorities are considered.</p>
<p><i>Marketing programs and available resources can be done with little or no budget.</i></p>	<p>Attendees at the training remarked that not every SBEAP can afford to invest large amounts of its budget towards advertising, and several training attendees identified several simple, do-it-yourself, cost-effective/efficient marketing solutions, such as:</p> <ul style="list-style-type: none"> ▪ <i>Employ social media marketing.</i> Increase and maintain a consistent presence on Facebook, Twitter, and Linked-In. These social media platforms offer a hassle-free approach to attracting new or potential customers as well as disseminating information. ▪ <i>Cross-promote; use each other as a resource.</i> Some small businesses and small business assistance providers have already created templates to market their outreach materials (brochures, flyers, etc.) that can be customized to meet business-specific or program needs. Businesses, trade associations and small business assistance providers can also cross-promote by listing each other's contact information on their website's resources or directory page.

