



Compliance Update

AWMA Georgia Chapter

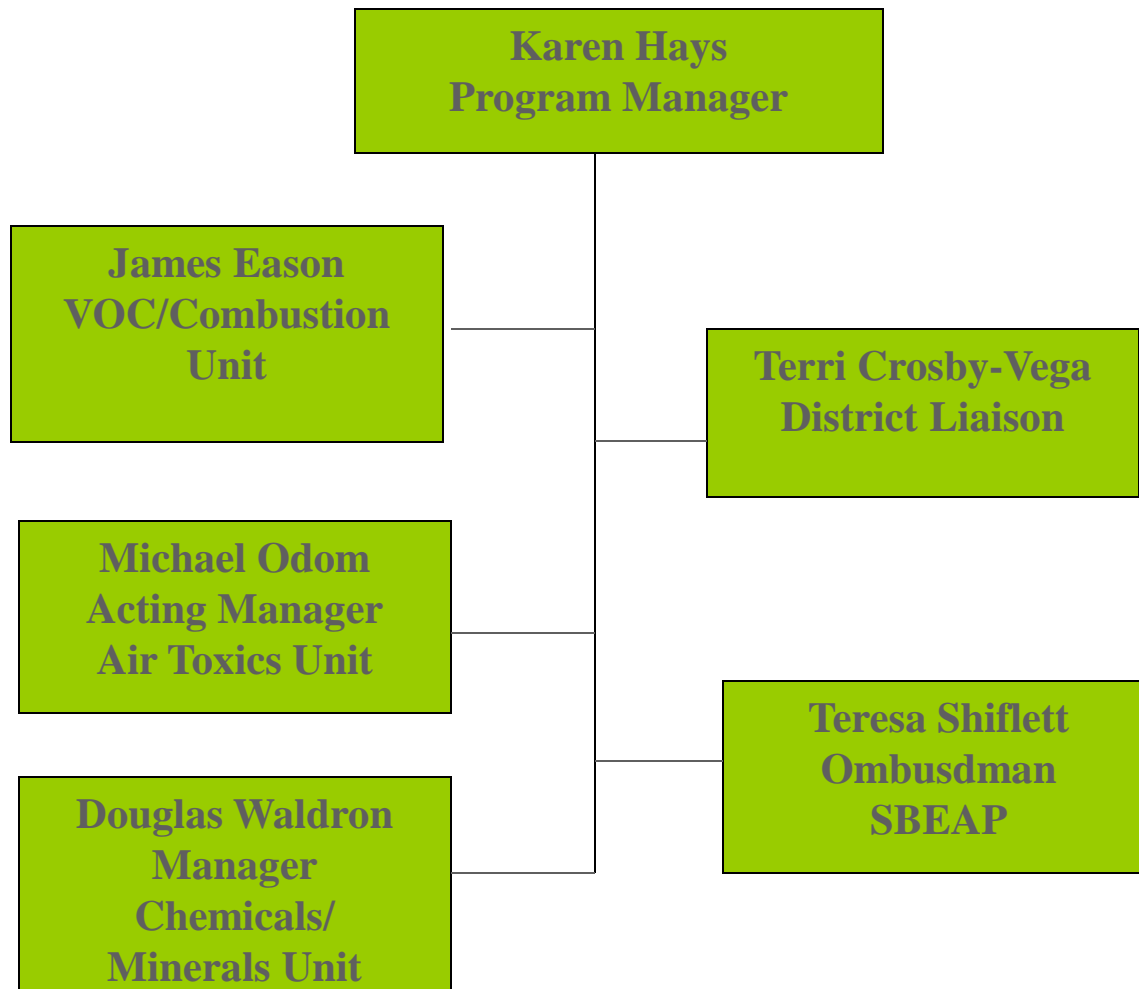
April 15, 2011 Regulatory Conference



What's New in the Stationary Source Compliance Program?

- Personnel Changes
- District Liaison
- Risk Management
- Small Business Environmental Assistance Program

Compliance Program





Risk Management Program

- Authority of section 112(r) of the Clean Air Act, the Chemical Accident Prevention Provisions (40 CFR Part 68)
- Requires facilities that produce, handle, process, distribute, or store certain chemicals to develop a Risk Management Plan (RMP). The RMP includes:
 - Hazard assessment
 - Prevention program
 - Emergency response program



Risk Management Program

- **The Risk Management Program is about reducing chemical risk at the local level. The information in the RMP helps emergency response personnel respond to chemical accidents.**
- **Approximately 300 sources in Georgia are subject to the requirement to develop an RMP.**
 - Housed in the Air Toxics Unit since July 2010
 - RMP inspections typically scheduled ~ 2 weeks in advance



District Liaison

- Serves as primary contact between Air Branch and GA EPD District Offices
- Provides regulatory and technical assistance concerning air regulations
- Works with various Air Branch programs to help Districts with cross-program issues
- Assists with District inspection planning



Small Business Environmental Assistance Program (SBEAP)

Ombudsman

- Advocate for GA small businesses
- Goal is voluntary compliance
- Small business < 100 employees

Technical Assistance Program

- CAA permit/compliance assistance
- CAA regulatory outreach





Small Business Environmental Assistance Program (SBEAP)

SBEAP Compliance Advisory Panel

- Ombudsman serves at secretariat to CAP
- CAP responsibilities
 - Advise SBEAP on activities
 - Work with National CAP
- CAP positions are appointed
 - Governor (2)
 - State Legislature (4) [2 House, 2 Senate]
 - Director, EPD (1)



Compliance Assurance

- **Full Compliance Evaluations (FCEs)**
 - Generally include unannounced inspections
 - Review of annual compliance certifications
 - Review of periodic reports
 - Review of stack tests results from the Industrial Source Monitoring Program (ISMP)
 - Inspection Reports
- **Complaint Investigations**
- **Enforcement Actions**

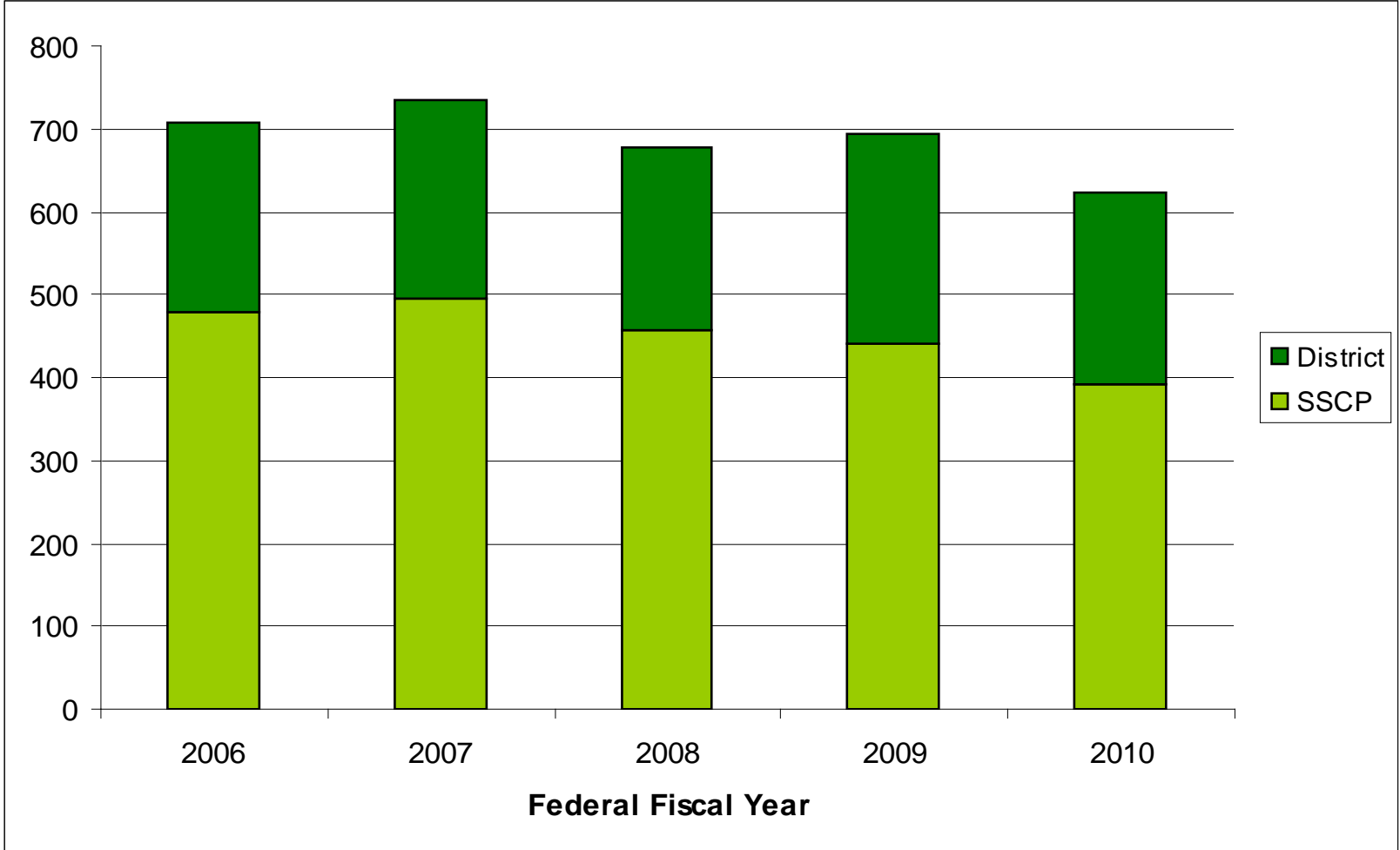


Inspection/ Full Compliance Evaluation Priorities

- **US EPA's Compliance Monitoring Strategy**
 - FCE on Title V major sources at least once every two years
 - FCE on synthetic minor sources at least once every five years
 - Enter required information into EPA's AFS database
- **Complaints**
- **Enforcement history, new regulations, new construction, MACT sources, etc.**



Full Compliance Evaluations/ Inspections



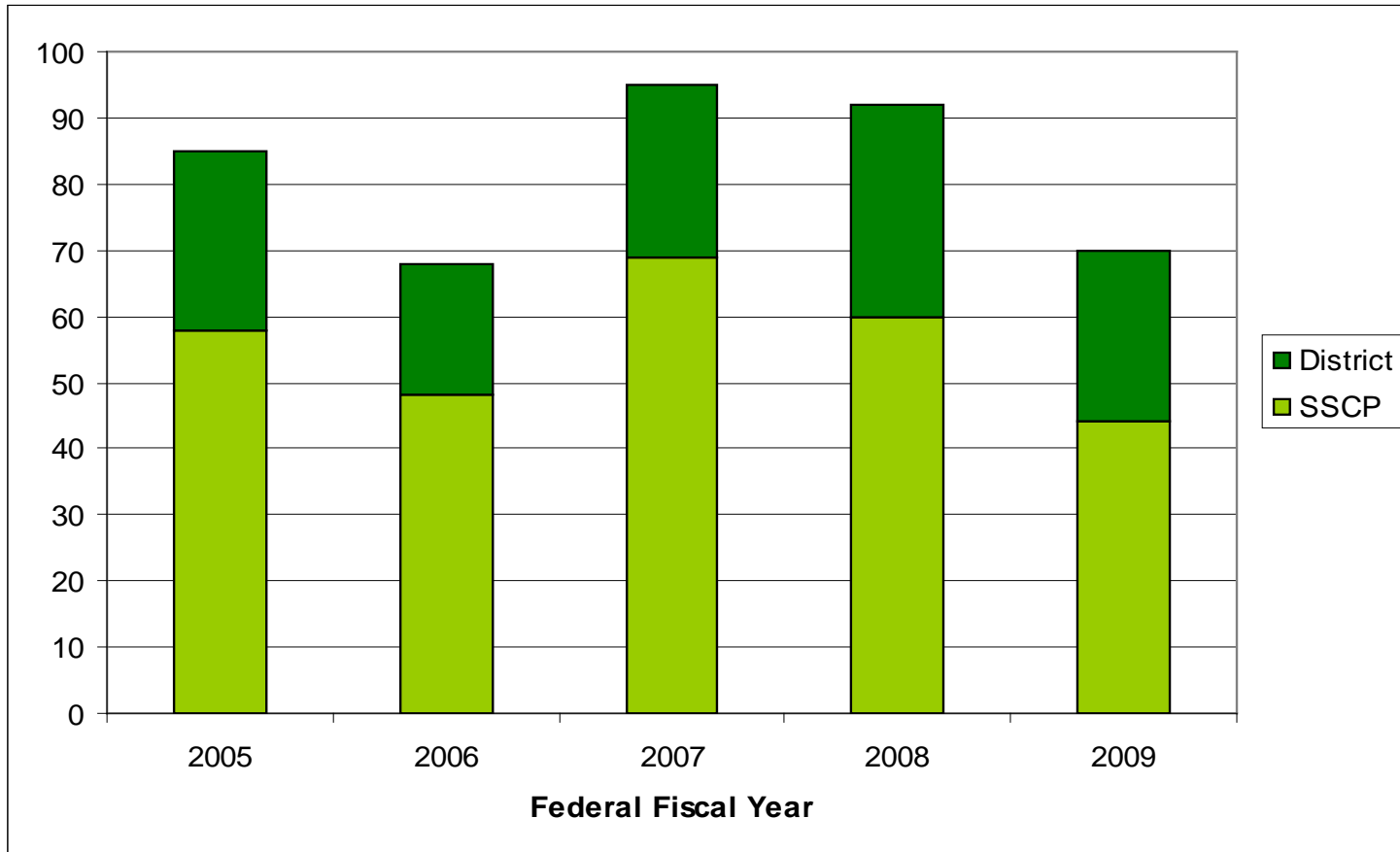
How Enforcement Action is Handled



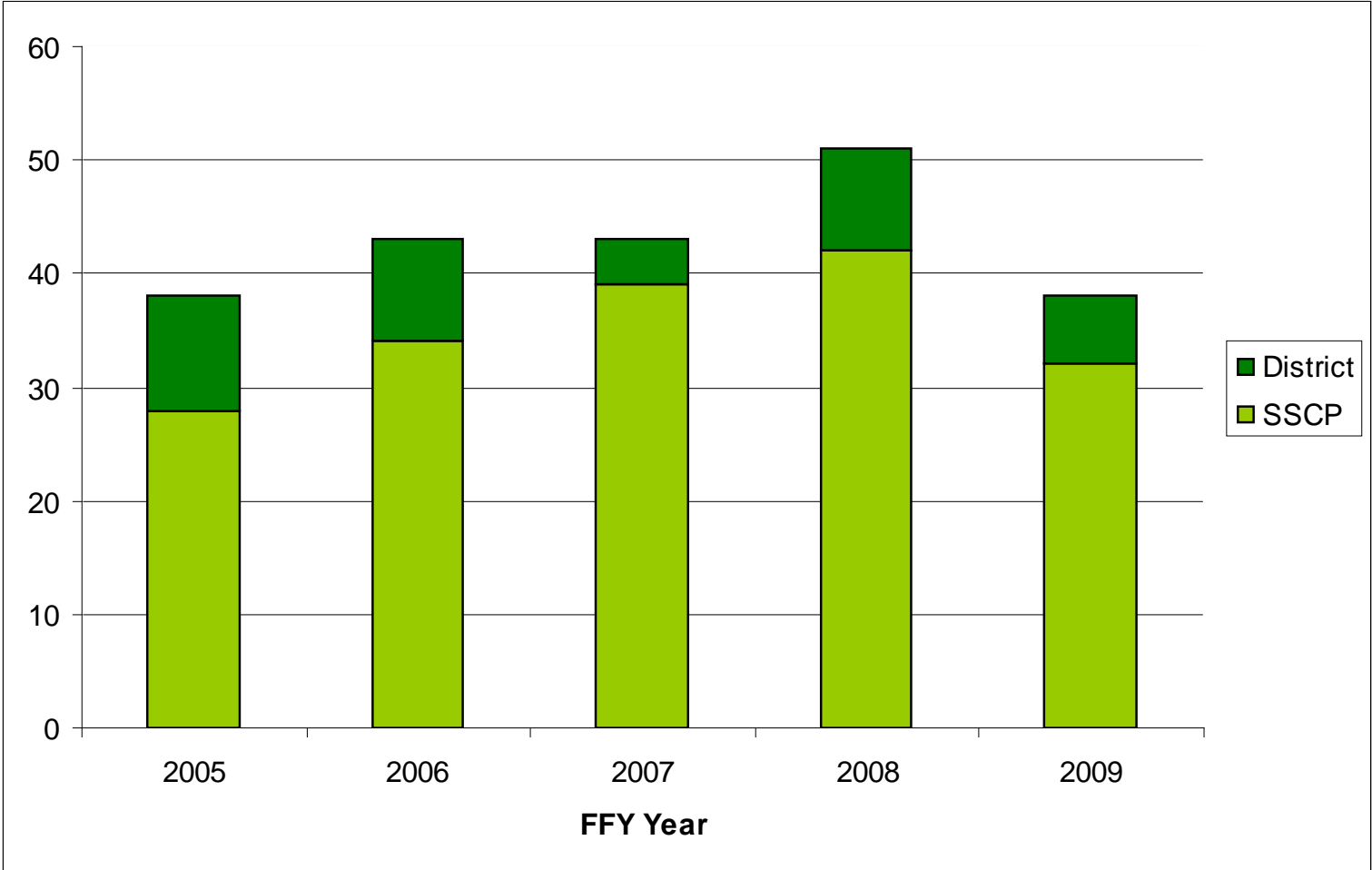
- EPA's High Priority Violator (HPV) / Timely & Appropriate (T&A) guidance
- Air Protection Branch's Compliance Assurance Strategy and Penalty Calculation Procedures
- Minimum Data Requirements (MDR) entered into EPA's Air Facility System (AFS) database



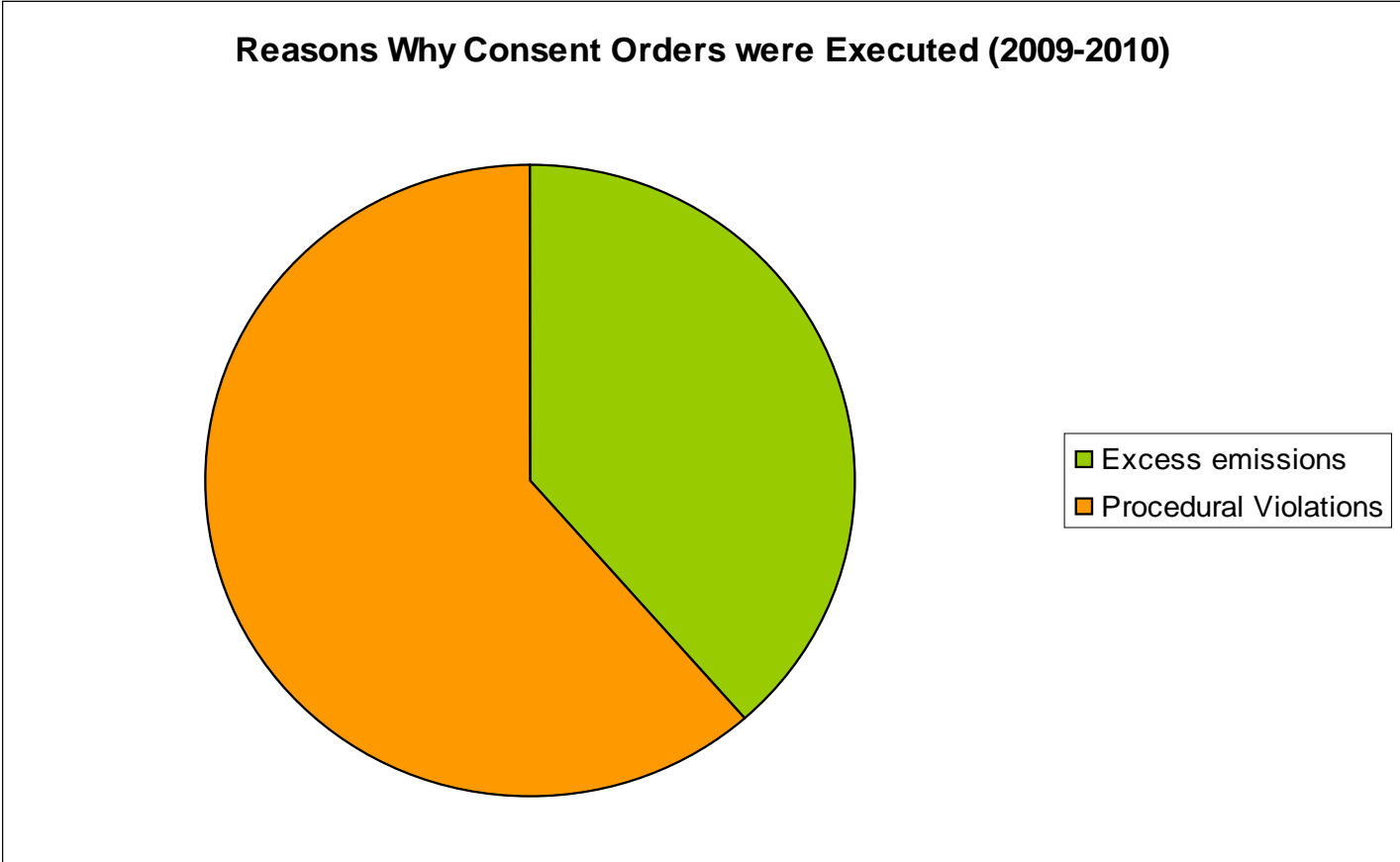
Notices of Violations Issued



Consent Orders Executed



Reasons Why Consent Orders were Executed (2009-2010)*



* Orders often executed for more than one reason



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