

National Compliance Initiatives

AWMA Meeting
January 29, 2020



Creating Cleaner Air for Communities by Reducing Excess Emissions from Stationary Sources (CCAC)

Goal: Improve air quality by reducing emissions of VOCs and HAPs

- Identify geographic locations and facilities within those locations that:
 - are contributors to adverse community health impacts; or
 - adversely affect an area's attainment status



R7 CCAC Plans for FY2020

- Approximately 40 inspections. Mostly HAPs sources, largely targeted based on discussions with state staff, compliance history, and citizen complaints
- Future Years:
 - Utilize ECHO ECATT tool as well as examine compliance with area source direct implementation MACTs (for which states have not taken delegation)
 - Lead sources – examining sources that certified they were under the monitoring threshold for the 2008 designations



Reducing Hazardous Air Emissions from Hazardous Waste Facilities

Goal 1: Improve compliance by TSDFs and LQGs with regulations that control organic air emissions from hazardous waste management activities



R7 RCRA Air Emissions Plans

- 16 planned inspections in FY2020
- Mix of TSDFs, manufacturers, and refineries
- Planning 11 inspections/year in FY2021 and FY2022



Reducing Significant Noncompliance with NPDES Permits

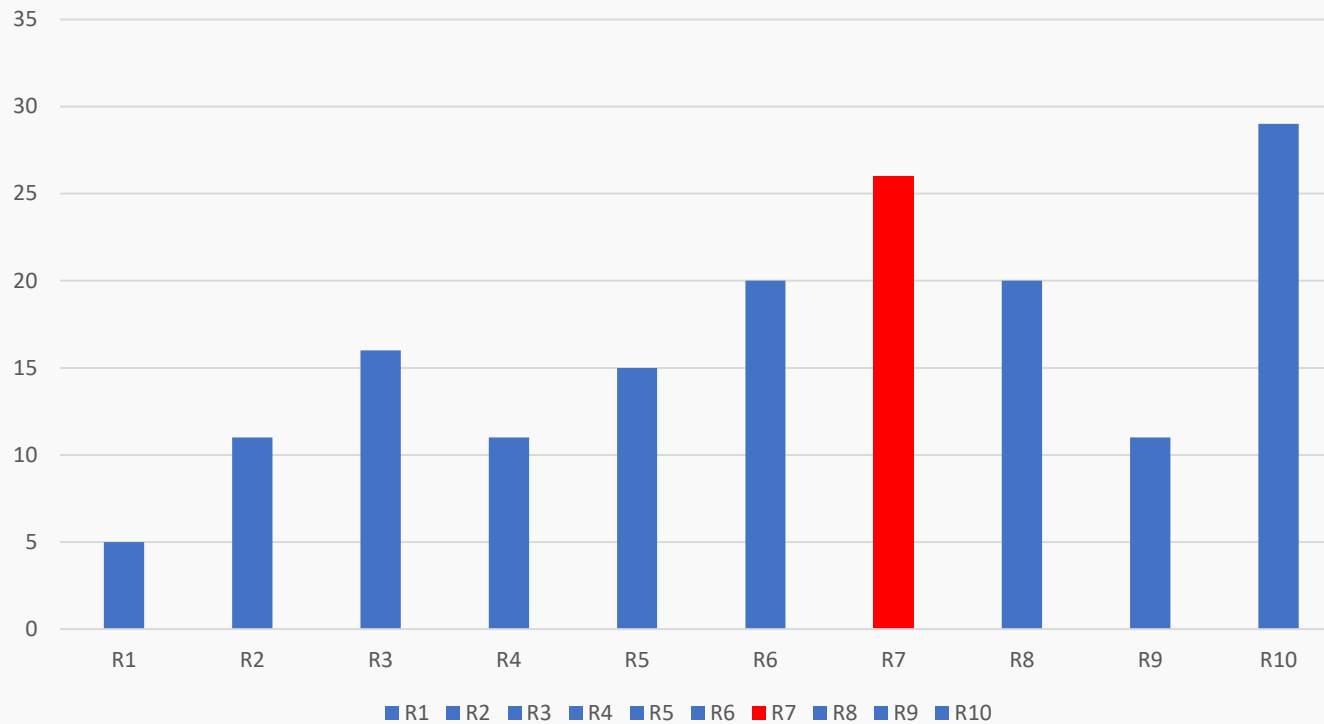
Goal 1: Reduce the rolling four-quarter SNC rate by 50% by the end of FY 2022

Goal 2: Assure that high priority SNC facilities with the most significant violations are timely and appropriately resolved

- Quarterly discussions with states on general SNC reduction activities and on specific high priority SNC facilities



NPDES SNC By Region





NPDES SNC in R7

(FY2019 Q3 Data)

Region 7 NPDES SNC Status			
	Major	Minor	Total
Total Facilities ¹	427	5,572	5,999
SNC Categories			
DMR Non-receipt	36	925	961
Effluent Violations	29	232	261
Compliance Schedule	57	296	353
% SNC	2%	24%	26%

¹ Total Facilities = All active major and minor individually permitted NPDES facilities



NPDES SNC – R7, By State

(FY2019 Q3 Data)

Iowa NPDES SNC Status			
	Major	Minor	Total
Total Facilities ¹	143	1238	1381
SNC Categories			
DMR Non-receipt	3	188	191
Effluent Violations	4	33	37
Compliance Schedule	35	147	182
% SNC	3%	27%	30%

Nebraska NPDES SNC Status			
	Major	Minor	Total
Total Facilities	51	638	689
SNC Categories			
DMR Non-receipt	1	117	118
Effluent Violations	6	25	31
Compliance Schedule	1	3	4
% SNC	1%	21%	22%

Kansas NPDES SNC Status			
	Major	Minor	Total
Total Facilities	57	1,280	1,337
SNC Categories			
DMR Non-receipt	0	4	4
Effluent Violations	1	15	16
Compliance Schedule	0	1	1
% SNC	<1 %	1%	1%

Missouri NPDES SNC Status			
	Major	Minor	Total
Total Facilities	176	2,416	2,592
SNC Categories			
DMR Non-receipt	32	616	648
Effluent Violations	18	159	177
Compliance Schedule	20	145	165
% SNC	3%	35%	38%

¹ Total Facilities = All active major and minor individually permitted NPDES facilities



Reducing Noncompliance with Drinking Water Standards at Community Water Systems

Goal: Ensure clean and safe water by improving compliance at CWSs regulated under the SDWA

- By 2022, reduce by 25% the number of CWSs out of compliance with health-based standards, from 3600 to 2700

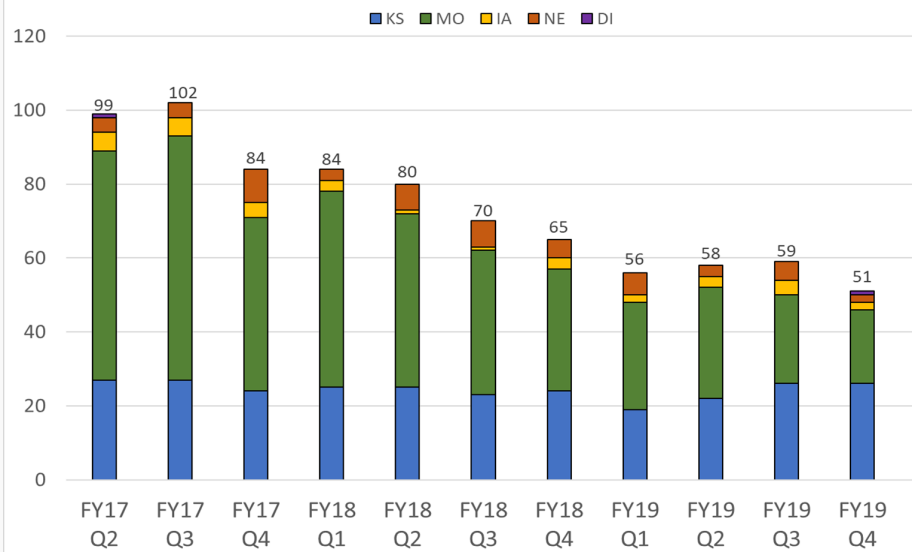


HB Viols in R7

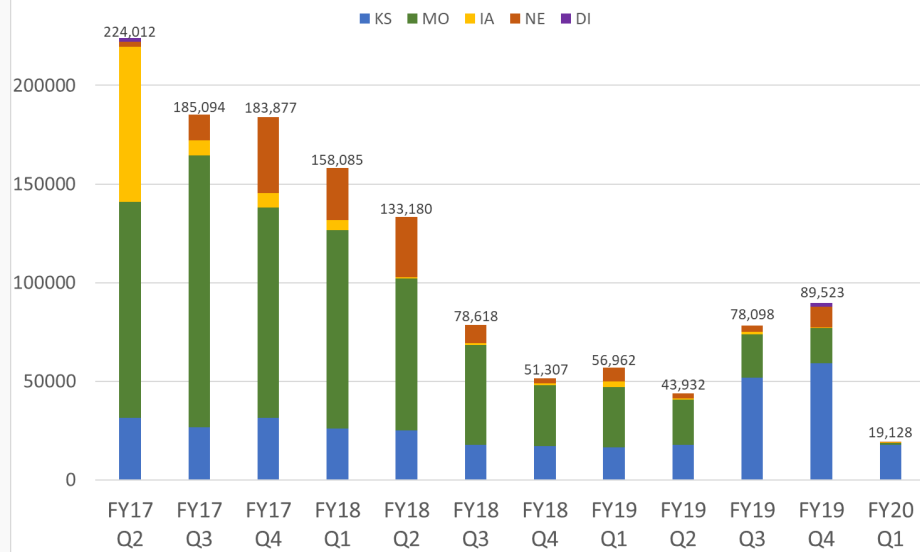
# CWSs w Health-Based Violations								
	17Q3	17Q4	18Q1	18Q2	18Q3	18Q4	19Q1	19Q2
R7 DI	1	1	2	2	2	1	0	1
IA	29	29	25	24	18	17	15	16
KS	82	78	82	84	73	75	67	58
MO	109	102	99	91	83	78	78	79
NE	37	34	29	28	32	28	33	34
Total	258	244	237	229	208	199	193	188



Drinking Water Systems in Priority Status (#)
EM02



Population Served by Priority CWS (#)
EM03



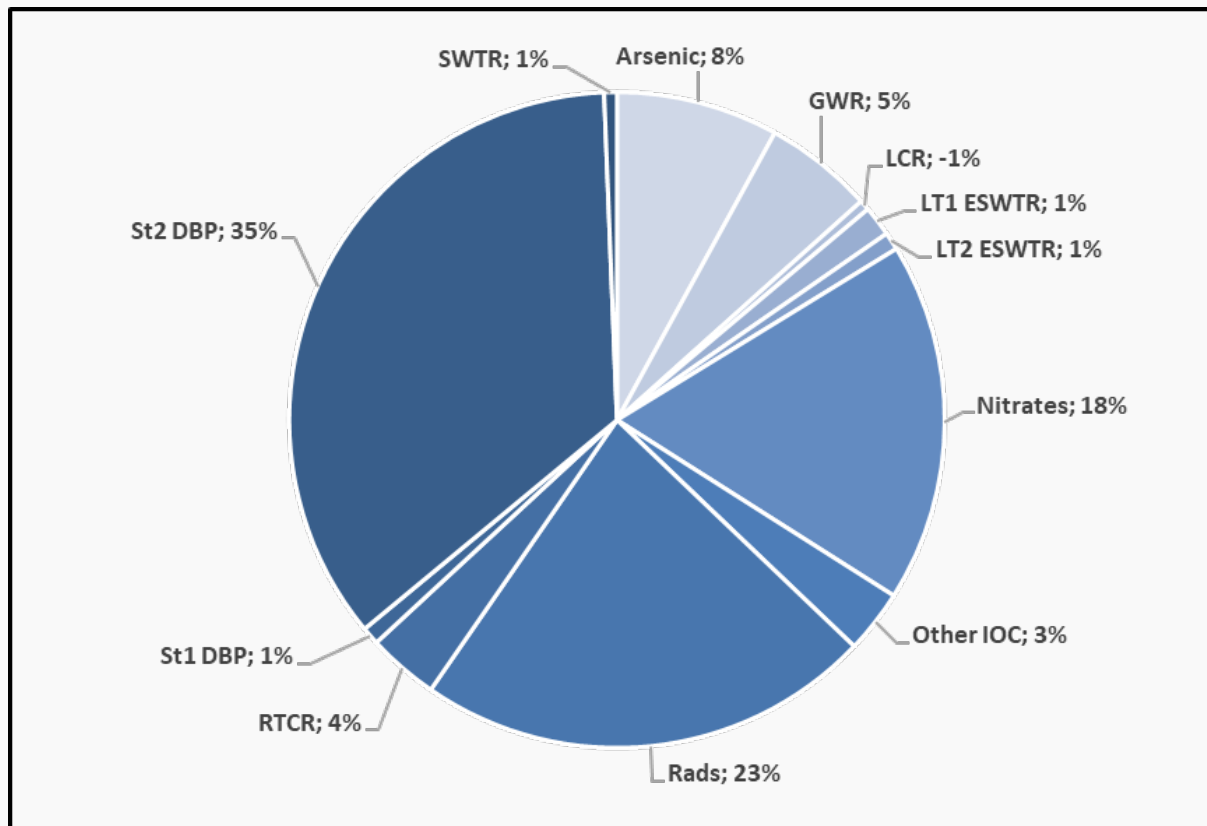


Water Systems in Priority Status by Region (July 2019)

REGION	# of Water Systems in Priority Status (July 2019)	% of Water Systems in Priority Status (July 2019)
1	258	2.46%
2	152	1.26%
3	304	1.94%
4	108	0.62%
5	692	1.63%
6	520	4.38%
7	51	1.00%
8	83	1.17%
9	55	0.57%
10	254	2.46%



Violation Type, R7 Systems





Stopping Aftermarket Defeat Devices for Vehicles and Engines

Goal: Prevent the removal of filters, catalysts, and exhaust gas recirculation systems from diesel-powered vehicles and engines (on-road and off-road)

- Focus enforcement and compliance efforts on:
 - Companies and individuals that manufacture, sell, and install aftermarket defeat devices
 - Commercial fleets and companies that purchase aftermarket defeat devices (rather than individual vehicle owners)
- Utilize combination of inspections and info requests
- Planning 12 inspections in FY2020; additional investigations



Reducing Risks of Accidental Releases at Industrial and Chemical Facilities

Goal: Reduce risk to human health and the environment by decreasing the likelihood of chemical accidents at CAA 112(r) regulated facilities

- Five focus areas
 - ammonia refrigeration
 - petroleum refining
 - chemical manufacturing
 - fertilizer distribution
 - gas production



Reducing Risks of Accidental Releases at Industrial and Chemical Facilities

- Increase 112(r) inspections by 10% compared to the last three years
- Compliance Assistance
 - Create lists of key safety measures in industry standards and lists of recognized and generally accepted good engineering practices
 - Outreach workshops to fertilizer distributors
 - Ammonia Safety days



112r NCI: R7 Activity

NAICS_DESCRIPTION	Number of Total Facilities Nationwide	Number of Total Facilities – R7	Number of Inspections FY17-19	Number of Enforcement Cases, FY17-19	Planned Inspections, FY2020
Petroleum Refineries	140	3	1	1	0
Ammonia Refrigeration	2200	72	25	22	5
Chemical Manufacturing	1200		24	15	7
Fertilizer Distribution	4200	1,426	38	17	9
Total			78	55	21



EPA-State Role on NCIs