

EPA Enforcement Update

DAVE COZAD, REGION 7

5/2/23



OVERARCHING
PRIORITY:

ENVIRONMENTAL
JUSTICE

- Early action
- Increase inspections
- Geographic Initiatives
- Remedies with tangible community benefits
- Increase community engagement



National Enforcement and Compliance Initiatives Proposal

Keep:

- Reduce NPDES SNC
- Drinking Water
- Chemical Accident
- Creating Cleaner Air for Communities

Sunset:

- Mobile Source Defeat Device
- RCRA Air

New:

- Climate

Maybe?

- PFAS
- CCR
- Lead

Drinking Water

Imminent and
Substantial
Endangerment

Priority
noncompliance
for BIL funding

Pb and Copper
Rule

Climate risk
resiliency

Chical Accident Risk Reduction

EJ

Climate

High accident rate sectors

Non-filers



Creating Cleaner Air for Communities

Metal
recyclers

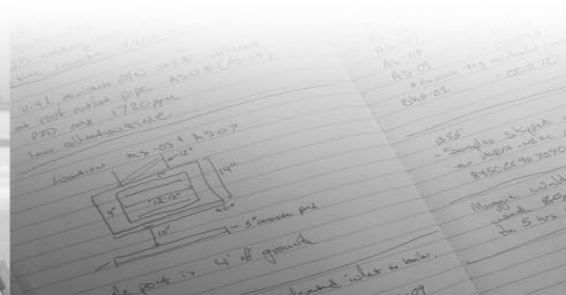
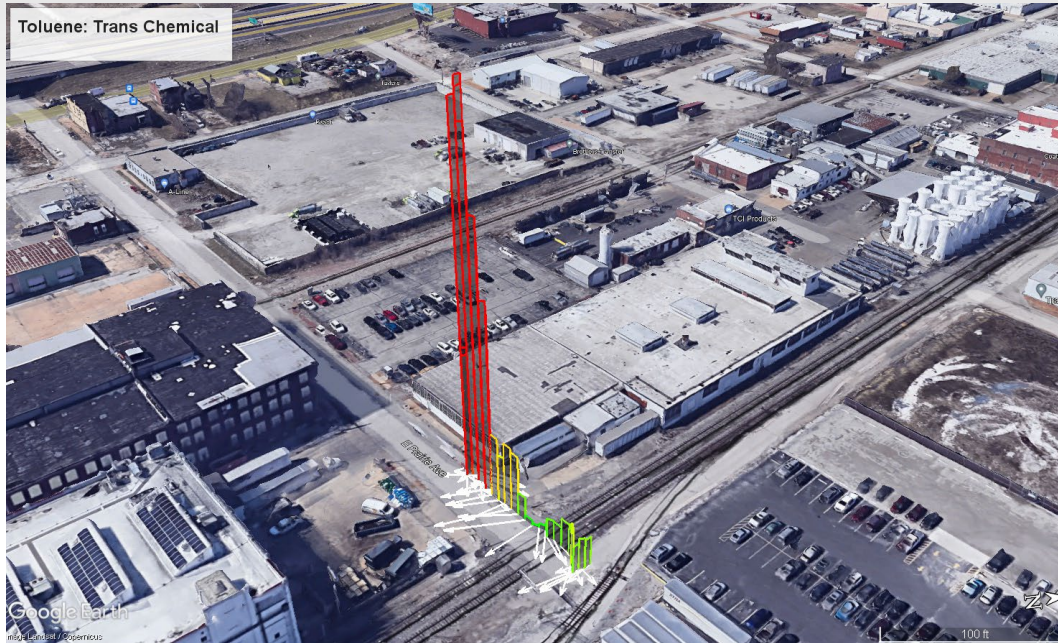
Petroleum
refiners

Oil and Gas

Air Toxics in EJ
Communities

TRANS CHEMICAL (cont.)

- VOCs (~ 1,500 ppb max), not pictured; toluene (150 ppb max)
- CAN_4608: 67 ppb toluene



Reducing NPDES SNC

- So far, reduced overall national SNC rate from 22% to 10%
- Most gains in DMR non-receipt and data issues
- Effluent SNC steady around 5%
- MO #s well above national average
- ***Focus going forward: Long-running effluent SNC***

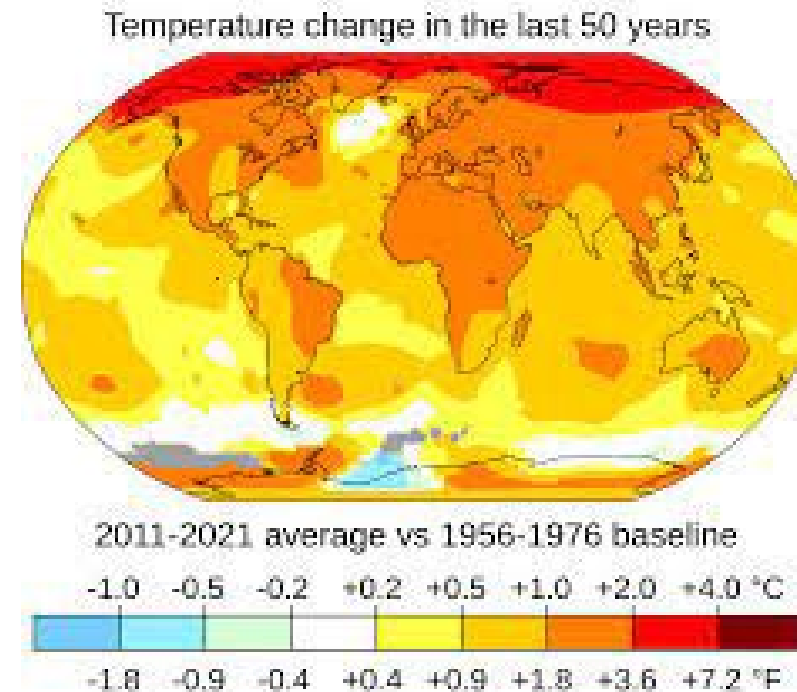
Proposed New Initiative: Climate

Mitigation:

- HFCs
- Oil and Gas
- Landfills

Adaptation/Resiliency:

- Drinking Water
- 112r



PFAS Roadmap

- “When EPA becomes aware of a situation that poses a serious threat to human health or the environment, the Agency will take appropriate action.... EPA will seek to hold polluters and other responsible parties accountable for their actions, ensuring that they assume responsibility for remediation efforts and prevent any future releases.”
Roadmap, p. 7
- “When EPA becomes aware of a potential imminent and substantial endangerment situation where PFAS poses a threat to human health, the Agency will swiftly employ its expertise to assess the situation and take appropriate action, including using statutorily authorized powers.”
Roadmap, p. 20
- *Recent 3M Cordova SDWA 1431 Order*

Coal
Combustion
Residuals

Widespread Noncompliance:

- Closure
- GW Monitoring
- Corrective Action

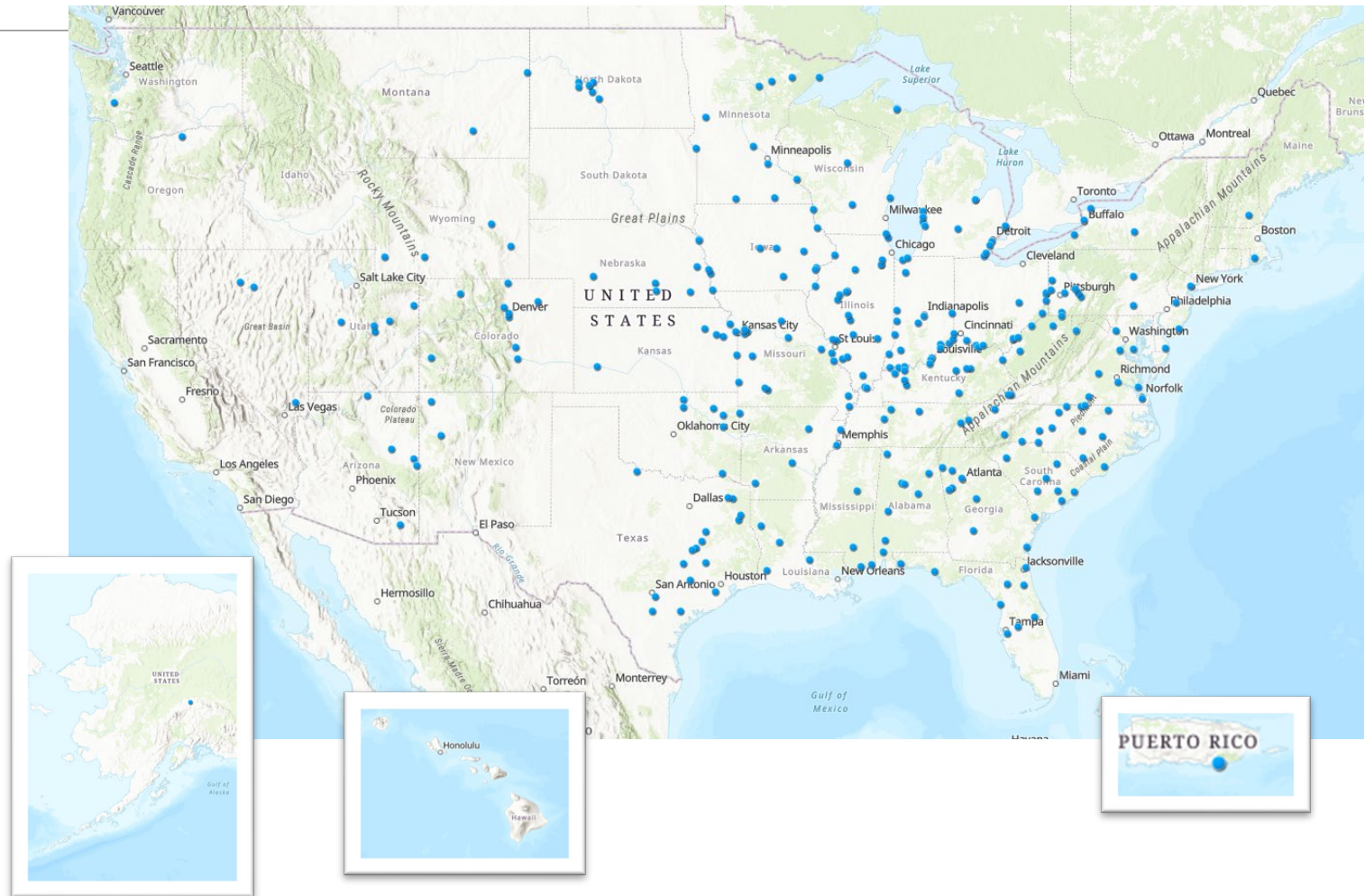
CCR Unit Universe

772 CCR units

- 533 CCR surface impoundments

50% of CCR units are in Regions 4 + 5, and another 25% of units are in Regions 6 + 7

Missouri: 45 units



Preventing Childhood Pb Poisoning

TSCA Pb Paint Rules

Air Sources

Pb in Drinking Water





Problem Area:
"Recycling Gone Bad"