



Expanding Compliance Monitoring Activities

January 16, 2013



Expanding Compliance Monitoring Activities

- Compliance monitoring = key component of program implementation
- Compliance Monitoring Strategies traditionally inspection/investigation based
- New technology/electronic reporting may result in new ways to determine compliance at facility-specific level



Expanding Compliance Monitoring Activities

What other activities can be used to:

- Assess & document compliance
- Support enforcement
- Monitor compliance with orders & decrees
- Create deterrence
- Provide feedback to permit & rule writers



Expanding Compliance Monitoring Activities

CM activities are the means to determine *facility specific* compliance status

- ✓ On-site activities conducted by inspectors
 - ✓ Inspections; record & document reviews; sampling
- ✓ Off-site reviews conducted by
 - ✓ Compliance evaluations; record & document reviews; review sampling data
- ✓ Other activities
 - ✓ Addressing citizen complaints, assessments, ambient screening



Expanding Compliance Monitoring Activities

Monitoring results will need to be reported & documented to relevant data systems to count towards CMS activities

- Annual reporting includes:
 - ✓ CMS Plan submittals
 - ✓ Could use flags in data systems so plan could be generated
 - ✓ Counts and results of activities



Expanding Compliance Monitoring Activities

Next Steps & tentative schedule:

- ✓ Kick-off meeting – January 16
- ✓ EPA discussions with State Associations
 - ✓ Comments to Al Havinga or Rick Duffy by 2/16/13
- ✓ Discuss & make revisions to individual CMS's by 6/2013 in time for regional/state annual planning
- ✓ National data base changes by 9/30/13
- ✓ Implementation – October 2014



Compliance Monitoring Activities

- For further information contact:

Al Havinga, Office of Compliance

havinga.al@epa.gov

202-564-4147

or

Rick Duffy, Office of Compliance

duffy.rick@epa.gov

202-564-5014