

Item	MDR	FRV Policy	NESCAUM	San Diego
Reporting Universe	<ul style="list-style-type: none"> Major sources Synthetic minor sources CMS Sources Part 61 NESHAP Minor source Any source with formal enforcement action Active Tier 1 HPV sources 	<ul style="list-style-type: none"> Major sources Synthetic minor sources CMS Sources Part 61 NESHAP Minor sources Any source with formal enforcement action Active Tier 1 HPV sources 	<ul style="list-style-type: none"> CMS sources 	<ul style="list-style-type: none"> Major sources SM-80 (on an actual emission basis)
What is reported	<ul style="list-style-type: none"> Performed actions: <ul style="list-style-type: none"> informal and formal enforcing actions FCE stack tests Title V Annual Compliance Cert Change compliance code¹ When triggered for HPV --report all HPV Data² 	<ul style="list-style-type: none"> Performed actions: <ul style="list-style-type: none"> informal and formal enforcing actions FCE stack tests Title V Annual Compliance Cert Change compliance code upon finding of alleged violation When triggered for HPV --report all HPV Data² 	<ul style="list-style-type: none"> Performed actions: <ul style="list-style-type: none"> informal and formal enforcing actions FCE stack tests, Title V Annual Compliance Cert Indicate code for violation type (RD8 field?) When triggered for HPV --report all HPV Data² 	<ul style="list-style-type: none"> Determination of significance, if yes then: <ul style="list-style-type: none"> -Date of violation -Date of return to compliance, -Method of determining compliance -Enforcement action³ Single policy report data on only those elements that trigger HPV status
FRV Reporting in current AFS	<ul style="list-style-type: none"> Establish plant record, if needed Change compliance status to "in violation" code for: <ul style="list-style-type: none"> -air program -subpart -plant pollutant Change flag to "in compliance" once violation resolved 	<ul style="list-style-type: none"> Establish plant record, if needed Change compliance status to "in violation" code for: <ul style="list-style-type: none"> -air program -subpart -plant pollutant Change flag to "in compliance" once violation resolved 	<ul style="list-style-type: none"> Input violation type code (assumes elimination of the in compliance/ in violation finding) 	<ul style="list-style-type: none"> Establish plant record, for all SM80 and majors as needed Similar to HPV where a checklist is used (with the threshold criteria above) to initiate the reporting and actions are reported (but not linked?)
Timing	<ul style="list-style-type: none"> within 60 days of date reportable action performed 	<ul style="list-style-type: none"> Immediately 	<ul style="list-style-type: none"> within 60 days of date reportable action performed 	<ul style="list-style-type: none"> within 60 days of determination
Action Linking	<ul style="list-style-type: none"> Only HPV data 	<ul style="list-style-type: none"> Link to discover action 	<ul style="list-style-type: none"> Only HPV data 	<ul style="list-style-type: none"> No linking

¹Timing unclear- The MDR requirement to maintain the compliance code implies that the code should be changed at any time however updates are usually tied to uploads of performed actions. While not clear in the MDR this expectation is evident in the SRF metrics.

¹ HPV violation discovery, linked actions including addressing action & resolving actions

¹ Only reporting those cases with the following significant procedural violations: operating without a valid permit, modifying an existing facility without prior approval, failure to apply for a Title V permit, failure to submit Title V reports, failure to conduct required source test, failure to submit CEMs reports and failure to keep required records. Also reported significant emission violations of > 1 ton criteria or 500 lbs HAP released (single event or more than 7 consecutive days)