



# *Constructive* collaboration with Regulated Sources



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What does constructive  
collaboration look like?





Very destructive



Better

# Underlying premise

The responsible regulator and responsible regulated source share an obvious, but key, objective:

- Success in achieving organizational goals



# Ultimate objective of constructive collaboration?

- *Agency goals become important goals for the source*





# Prerequisites to success

- Mutual respect
- Exceptional skill
- Shared knowledge
- Predictability



# Mutual respect

## *Agency attitude:*

- Source activity is fundamentally legitimate
- Source exists to meet customer demand
- Source possesses greatest knowledge of it's own activities
- Source is motivated to succeed





# Mutual respect

## *Source attitude:*

- Agency is engaged in legitimate activity
- Agency has comprehensive understanding of Clean Air Act and regulations
- Agency is knowledgeable about my business activity
- Agency is supportive of source's success



# Exceptional skill and shared knowledge

Key to earning respect is knowledge of source operations:

- Training, training, training
- Collegial activities:
  - Co presentations at technical conferences
  - Routine interaction concerning technical/regulatory issues—(not everything is crystal clear)
  - Jointly strategize accomplishing regulatory requirements
  - Joint participation in mandatory certification
- **Sector focused training**

# REFINING PROCESS SERVICES

This is to certify that

Mark Asmundson

has satisfactorily completed the  
The Economics of Petroleum Refining

THIS 5th DAY OF May 2010

Roberto J. Casanova

Ray Cavanagh



# Maximizing benefit of training

## *Agency optimization:*

- Source activity is well understood by engineers and inspectors (obfuscation is useless!)
- AOP writers participate in facility inspections (avoids imposition of impossible permit conditions)
- Share training resources with State air programs in Region X and EPA staff (They should understand this stuff too)
- Regulations and permits are built on a foundation of knowledge



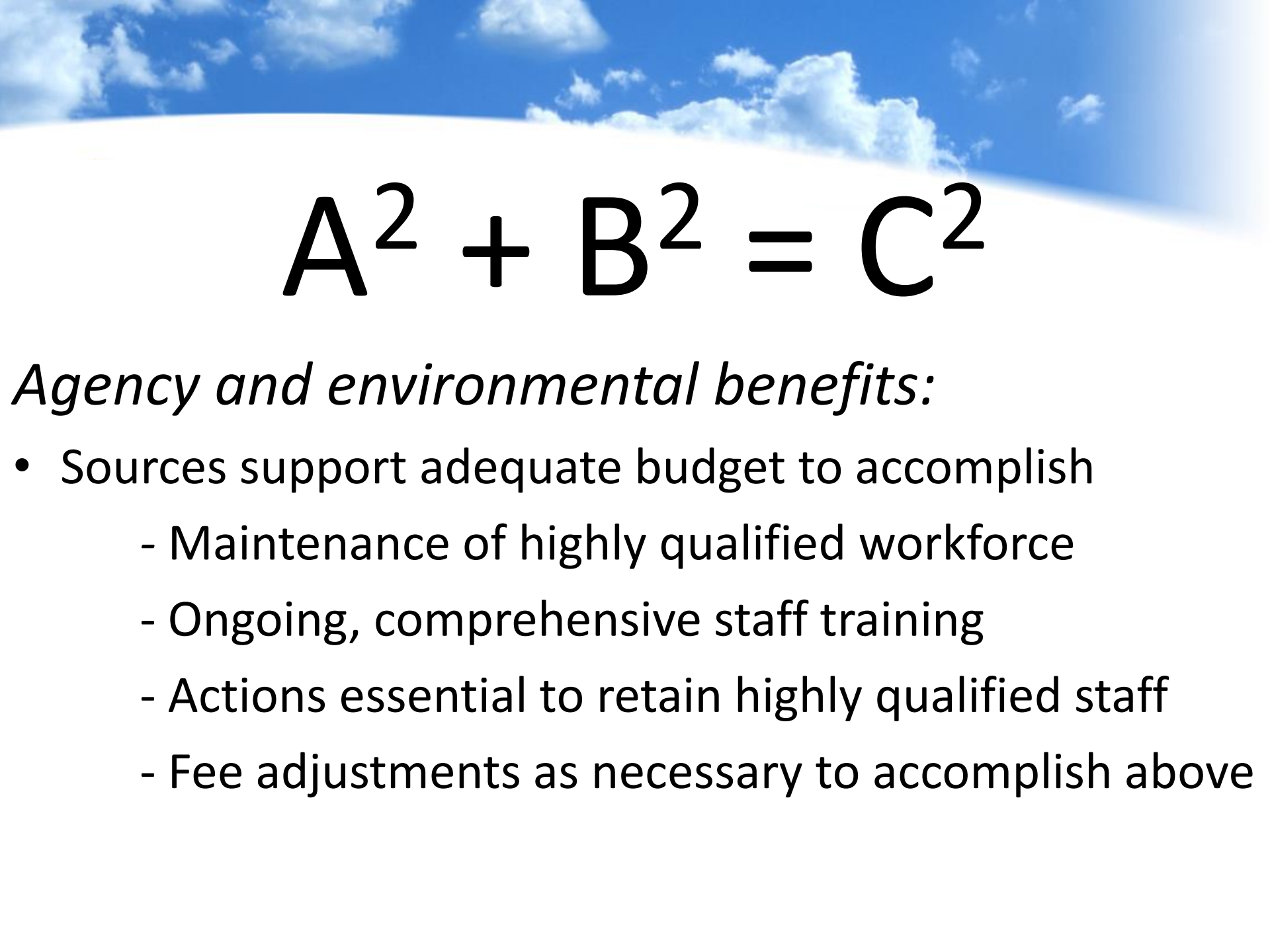
# Predictability

## *Agency expectations:*

- Source acts responsibly --- “No BS”
- Compliance is a very high priority

## *Source expectations:*

- Permitting is consistently timely
- Responses to non compliance events are rational


$$A^2 + B^2 = C^2$$

*Agency and environmental benefits:*

- Sources support adequate budget to accomplish
  - Maintenance of highly qualified workforce
  - Ongoing, comprehensive staff training
  - Actions essential to retain highly qualified staff
  - Fee adjustments as necessary to accomplish above



## *Results include*

- AOP's are current
- Inspections are informed and frequent
- Permits are issued in a timely fashion
- Permit process is transparent and accessible to the public
- *Agency goals have become important goals for Regulated Sources*



Questions?

