

ABSTRACT FOR AWMA 2007 CONFERENCE:

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**Changes in State Air Pollution Compliance Practices Due to the Increased Title V and Other Permit Recordkeeping and Reporting Requirements**

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ABSTRACT

Title V and other state air permits require permit holders to conduct greater amounts of recordkeeping and reporting of compliance status than previously required.

These large amounts of new compliance information being sent to state air pollution control agencies are creating a need for states to reexamine the most cost effective ways of reviewing this incoming information and determining whether to forward information about deviations for compliance or enforcement review and action.

This paper presents the results of a survey conducted of 30 state air pollution control agencies on their compliance practices.

Topics covered by the survey include:

1. Organization and Resources for Compliance Review and Management
2. Emission Standard Compliance Method Testing Practices
3. Review Procedures for Annual Emission Statement Submittals
4. Review Procedures for of Annual Compliance Certifications
5. Review Procedures of Excess Emission Reporting

6. Procedures for Facility Inspection of Recordkeeping and Operations to Assure Compliance with Permit Conditions
7. Review of Other Reports Submitted as Permit Conditions
8. Criteria for Referring Deviations from Compliance Requirements for Enforcement Actions
9. Biggest Problems Faced in Compliance Review and Solutions to Those Problems
10. Best Practices for Conducting Compliance Reviews
11. Suggestions to Other State Agencies in How to Improve Their Compliance Review Practices

The results of this survey will be useful to government air pollution control agencies and to Title V or other air permit holders concerned with how the compliance information they report and maintain is used by state agencies to evaluate their compliance status.