

EPA/State/Local Programs Air Enforcement Workshop
U.S. EPA Region 4, Atlanta, Georgia
October 4-6, 2016

States/Local Programs Roundtable Discussion

1. Personnel Issues
 - a. Retaining New Talent – The states have been using resources to train new employees who then leave for other competitive opportunities.
 - b. Succession Planning – There is a concern that the knowledge of procedures and methods are retained even when senior employees are retiring.
 - c. New Department of Labor Overtime Rule – The new rule is now more liberal on payment of overtime and additional overtime costs places a burden on an already strained budget.
 - d. Reorganizations – Multimedia organizations for compliance and enforcement work is very challenging.
 - e. Training Needs – States continue to seek training opportunities in the most efficient and cost effective ways.
 - f. Career Paths – The states acknowledged that developing career paths that lead to both managerial and technical expert opportunities is important to encourage retention and growth.
2. Permit Fees
 - a. Title V Source Emissions Reductions - Emission reductions and plant closures have significantly reduced the amount of title V fees collected to implement the program.
 - b. Expanding the Fee Base – Some programs are looking to expand the permit fee requirements to include synthetic minor sources and possibly incorporating an annual fee for the privilege of holding a permit.
3. General Issues
 - a. Pollution Issues – Small pollution issues such as odor and noise complaints are taking significant resources to address.
 - b. Use of Electronic Tablets in the Field – The consensus is that the tablets are only useful for inspections that can be performed using a checklist/simple template.
 - c. Electronic Reporting Tool (ERT) – Industry is using the federal tool and are submitting the ERT to the states/local programs. However, the state/local programs do not find the current format useful and are still requiring companies to

submit a hard copy of each test report for their review. There was one recommendation that EPA should develop a web-based ERT process to make it more usable for the state/local programs.

- d. MACT Changes Needed – Time and resources have been used to create a method to fix errors in some of the state MACT rules, such as with the hydrogen chloride averaging rule and the chromium MACT rule.