EPA Initiatives

11/08

LA Chemical Assoc

Steve Gilrein, Deputy Director

Compliance Assurance & Enforcement Division

Discussion Overview

- Things I know a little about
- Things I know very little about
- Things I don’t know …

Topics to be Covered:

- National Priorities
- Regional Priorities

Measures of Success
(w/Enforcement Spin)

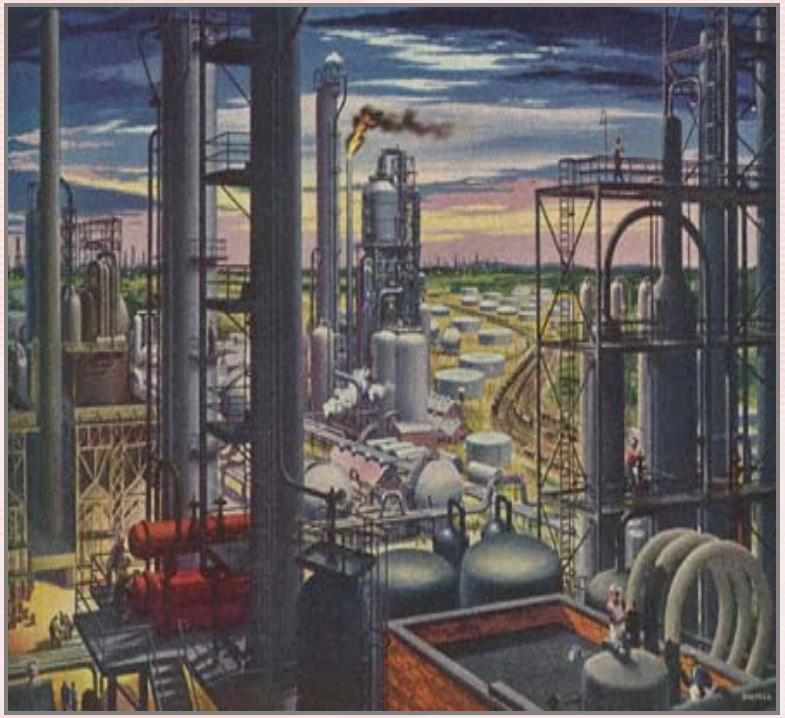
- State Partnerships
- State Program Integrity
- Human Health Impact
- Environmental Impact/Benefit
- Cost of Injunctive Relief

Things I Know A Little About

- National Priorities for Enforcement
- Regional Priorities for Enforcement

National Priorities: Air

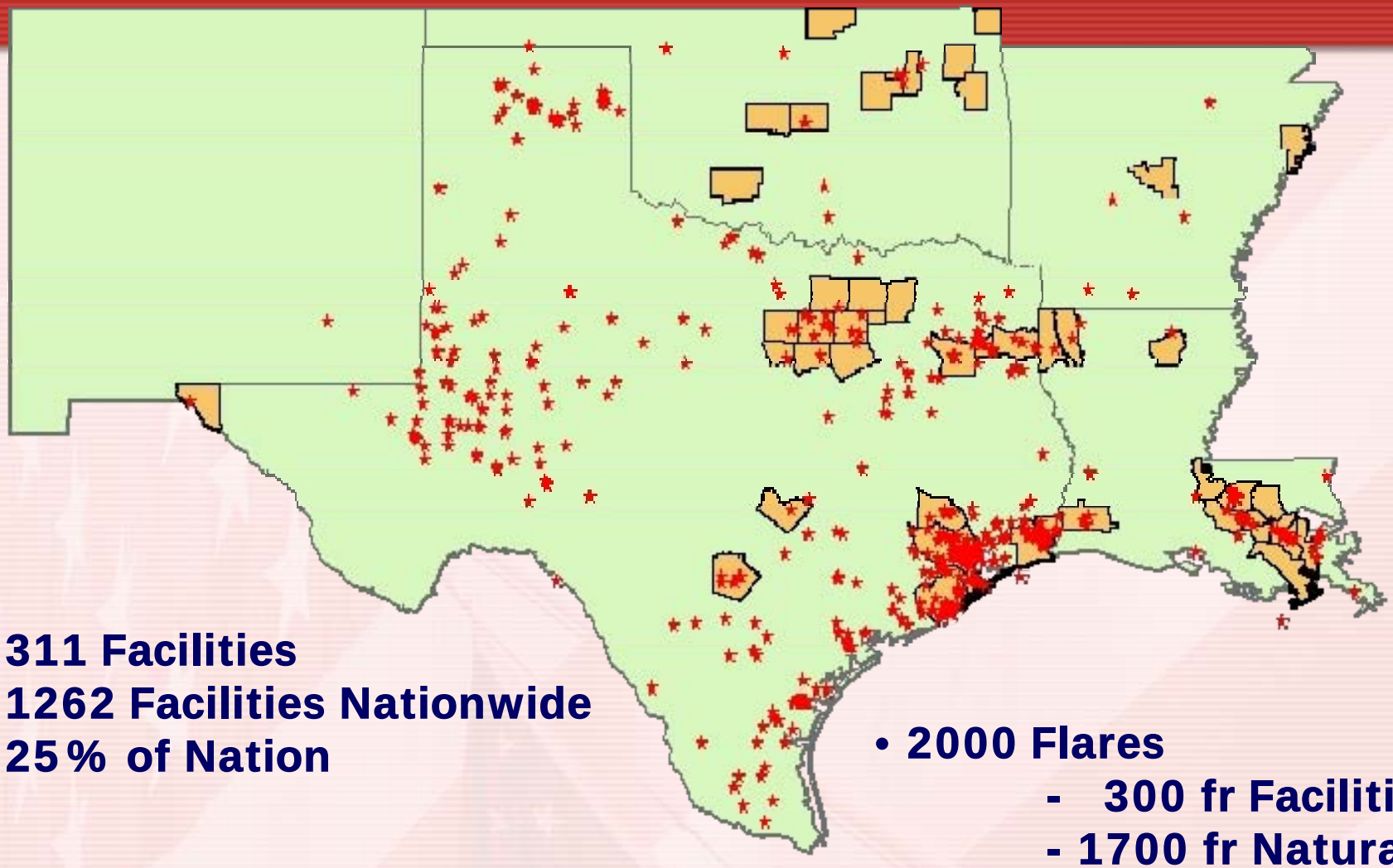
- New Source Review
  - Cement Plants
  - Acid Plants
  - Glass Manufacturers
- Air Toxics
  - Flare Operations
  - Surface Coatings
  - LDAR



Flares

Flares Universe

Flares & 8-hr Ozone Nonattainment Areas



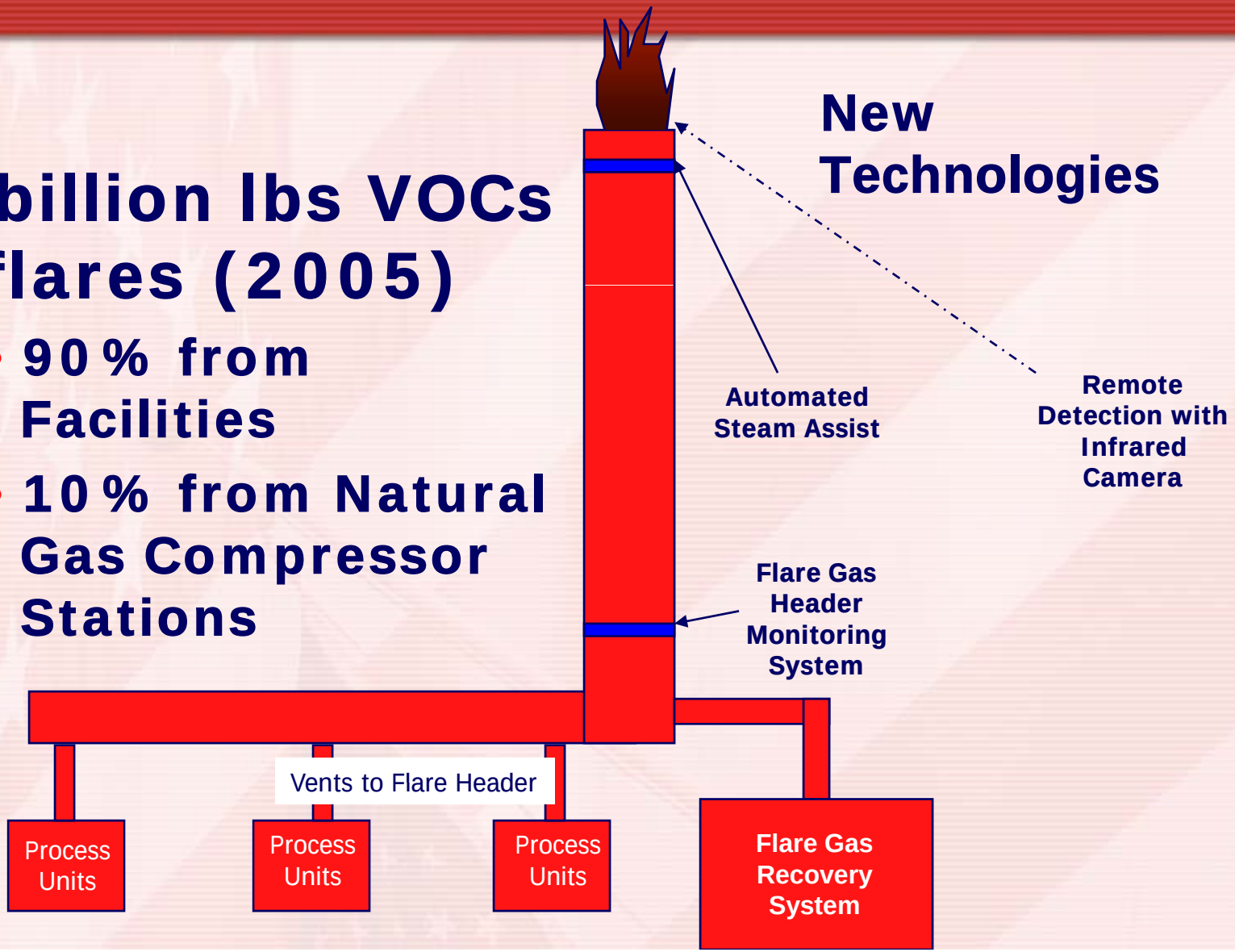
- 311 Facilities
- 1262 Facilities Nationwide
- 25% of Nation

- 2000 Flares
  - 300 fr Facilities
  - 1700 fr Natural Gas Compressor Stations

Potential Environmental Benefits

One billion lbs VOCs to flares (2005)

- **90% from Facilities**
- **10% from Natural Gas Compressor Stations**

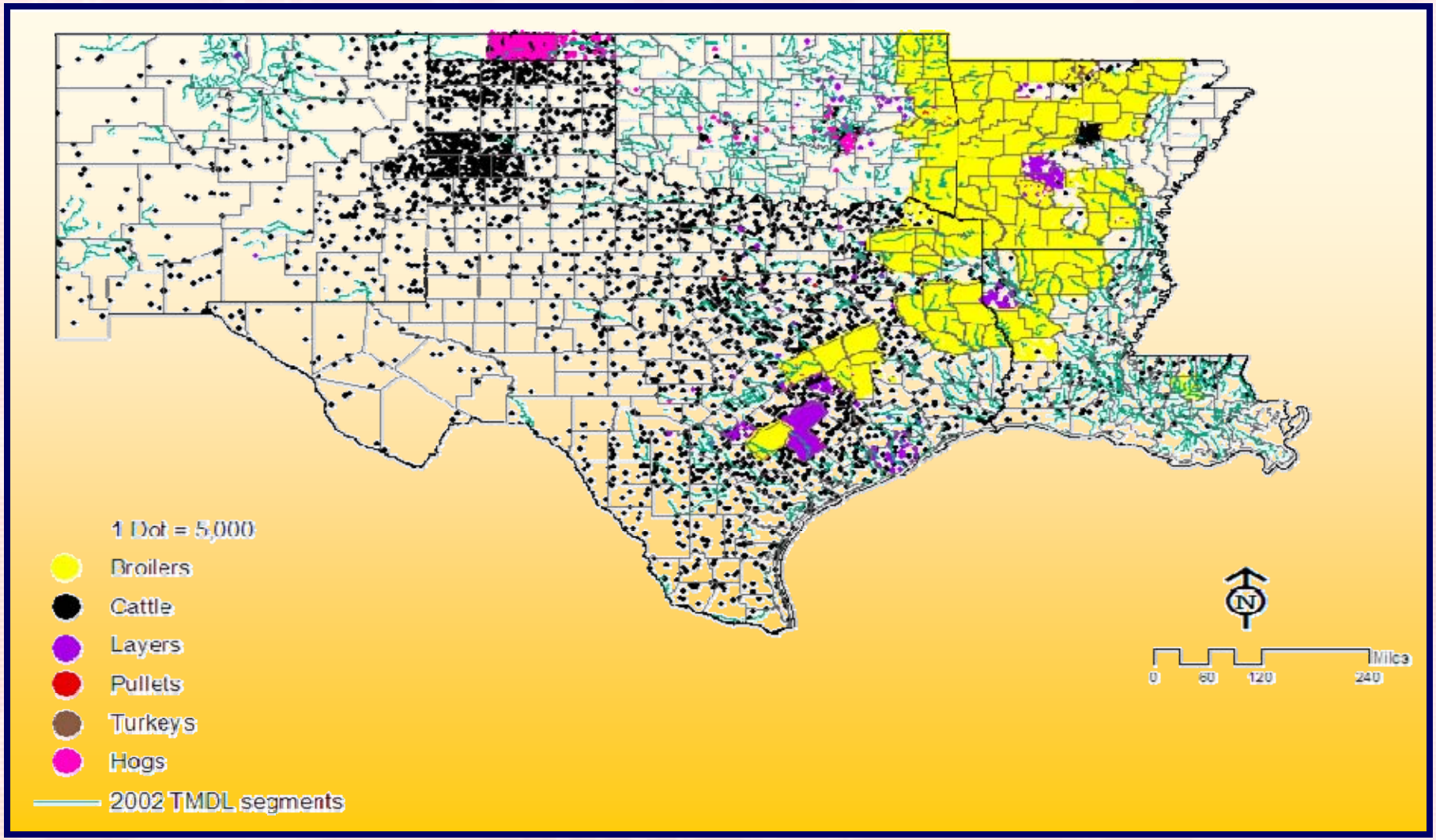


National Priorities: Water

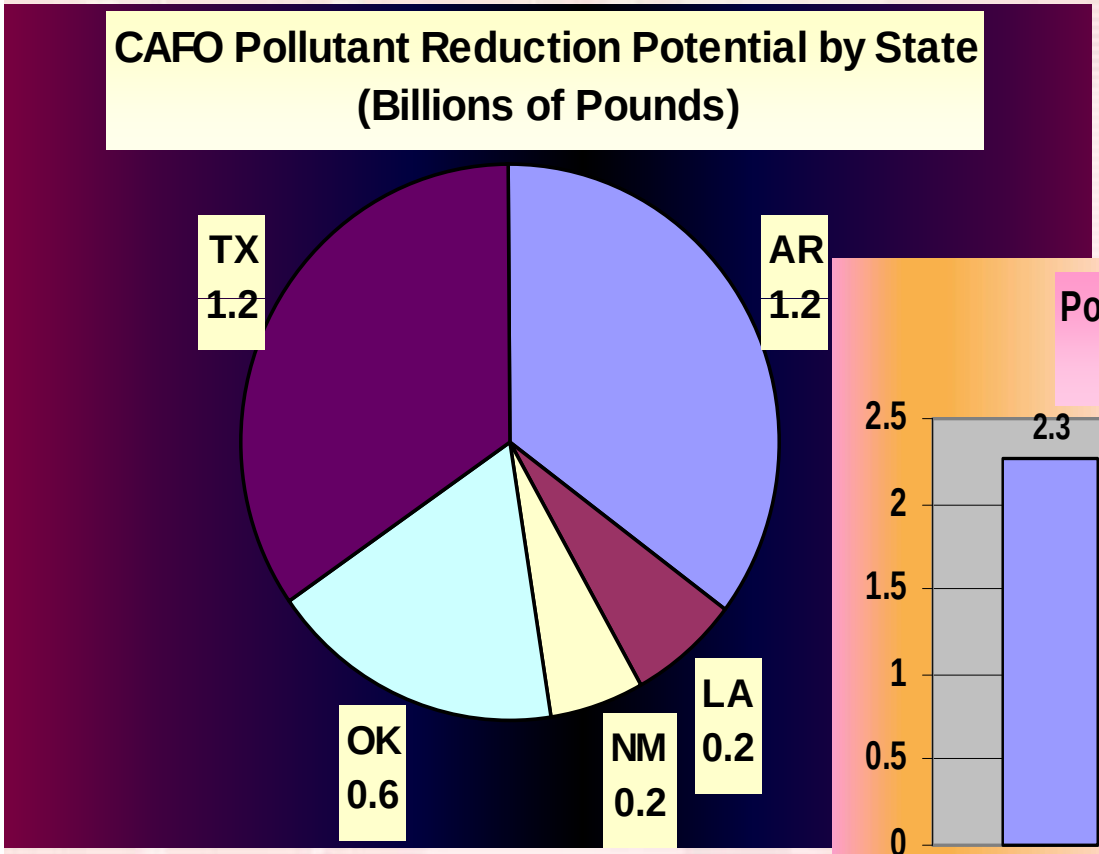
- CAFOs
- Combined Sewer Overflows
- Stormwater

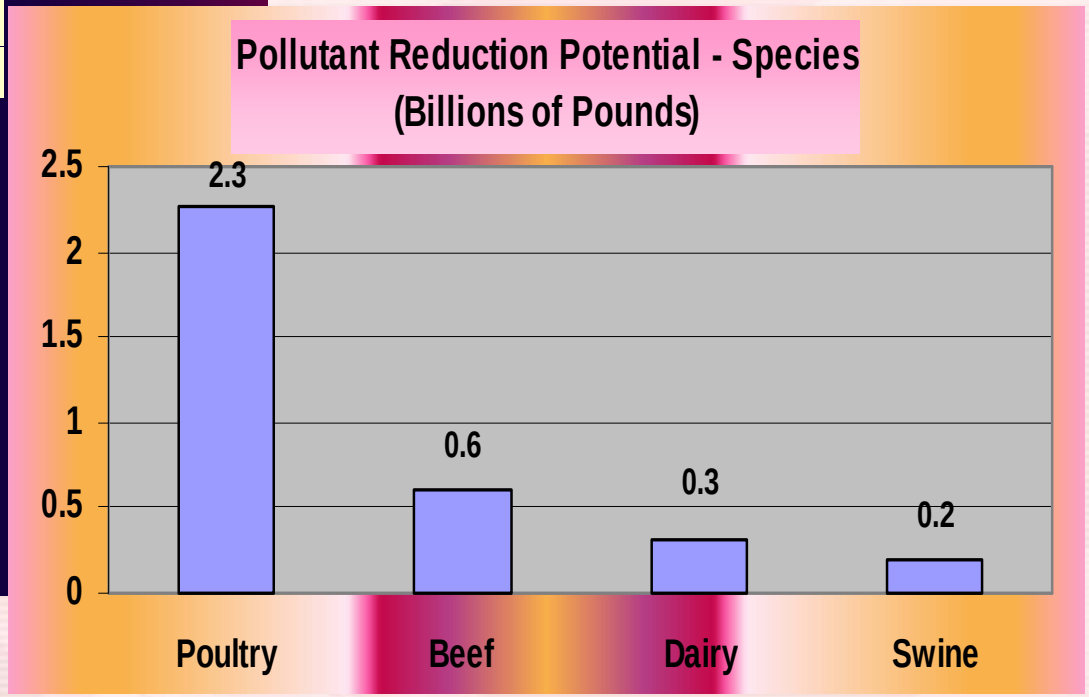
CAFO UNIVERSE

2002 Inventory



Potential Environmental Benefits





*** Groundwater impacts would likely increase values at least 50%**

National Priorities: Waste/RCRA

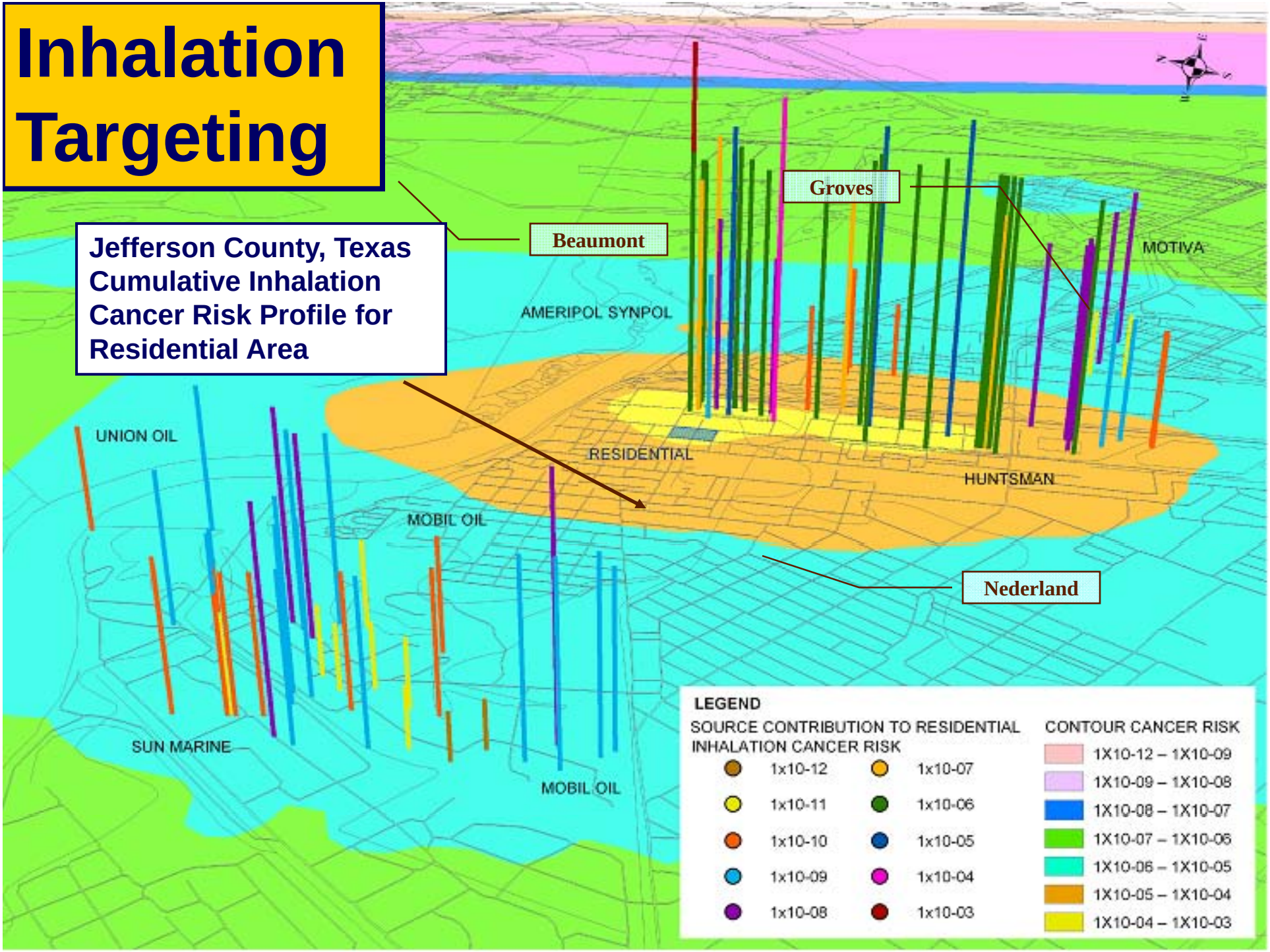
- **CA Financial Responsibility**
- **Mineral Processing**
- **Surface Impoundments**

Regional Priorities: Air

- 112r Pilot
- Oil & Gas – IR Camera
- Non-attainment Targeting
- Health-based Targeting
- Carbon Black
- Sugar Mills
- Bulk Terminals

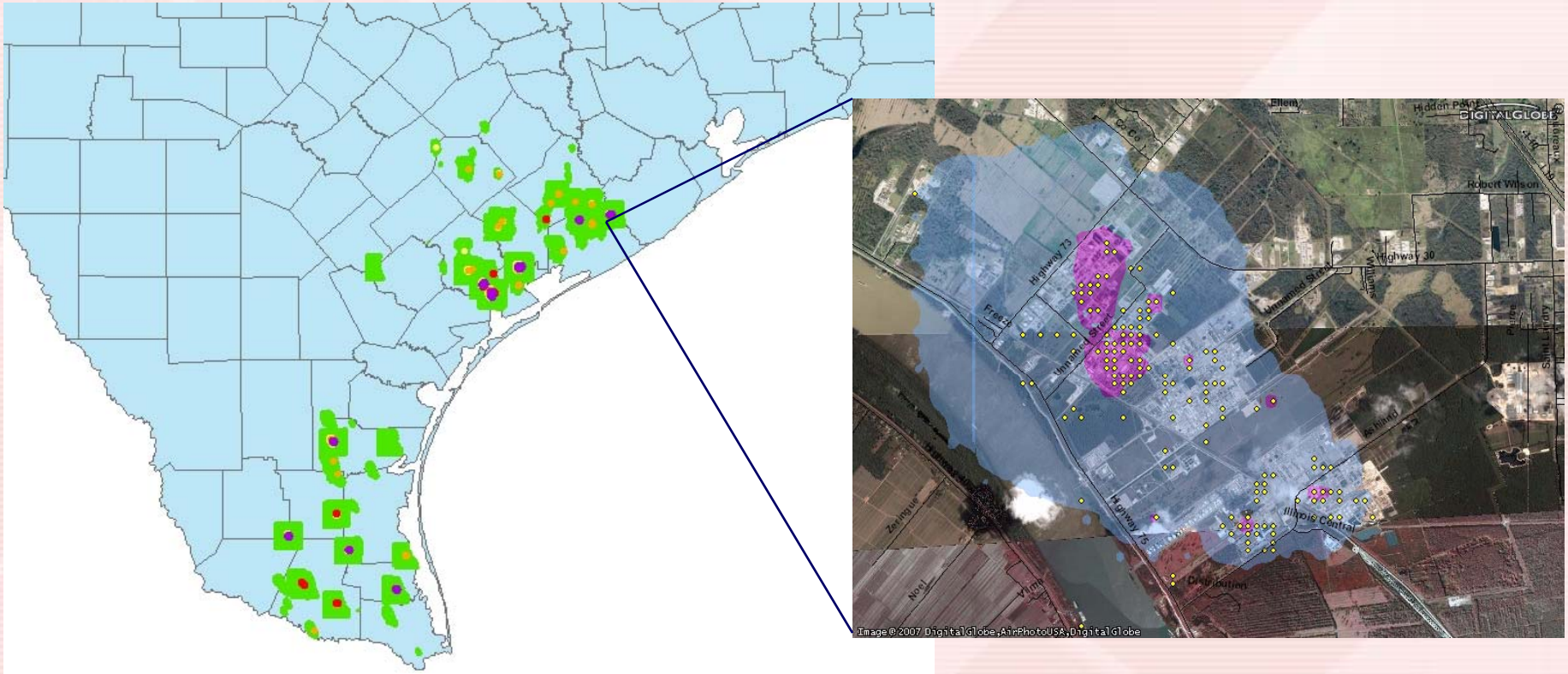
Inhalation Targeting

Jefferson County, Texas Cumulative Inhalation Cancer Risk Profile for Residential Area



Aggregate Inhalation Impacts

Utilize facility unit-specific emissions information to conduct dispersion modeling and inhalation risk modeling to evaluate potential for offsite impacts



Regional Priorities: Water

- Drinking Water Quality & Health-based Limits
- SNC
- Targeting in Impaired Water-sheds

Regional Priorities: Waste/RCRA

- **Multimedia**
- **Environmental Impact Emphasis**

Things I Know Very Little About

- **Multimedia Program Priorities**
- **(everything admittedly with an enforcement spin)**

Air Program Priorities

- SIP Approvals
  - Esp. in Texas
  - HUGE issue in Texas
- Anyone Ever Heard of a Flexible Permit?
- Petition for Program Withdrawal …

Water Program Priorities

- CAFO Rule
- WET Limits
  - Lethal
  - Sub-lethal

Waste/RCRA Program Priorities

- Land Reuse
- Resource Conservation Challenge
- Indoor Air ...

Things I Don't Know

... but on which I'm willing to opine

- The Future

Program issues to watch …

Air

- Area Source MACT Standards
- New Ozone Standard
- GHGs

Water

- Raponos

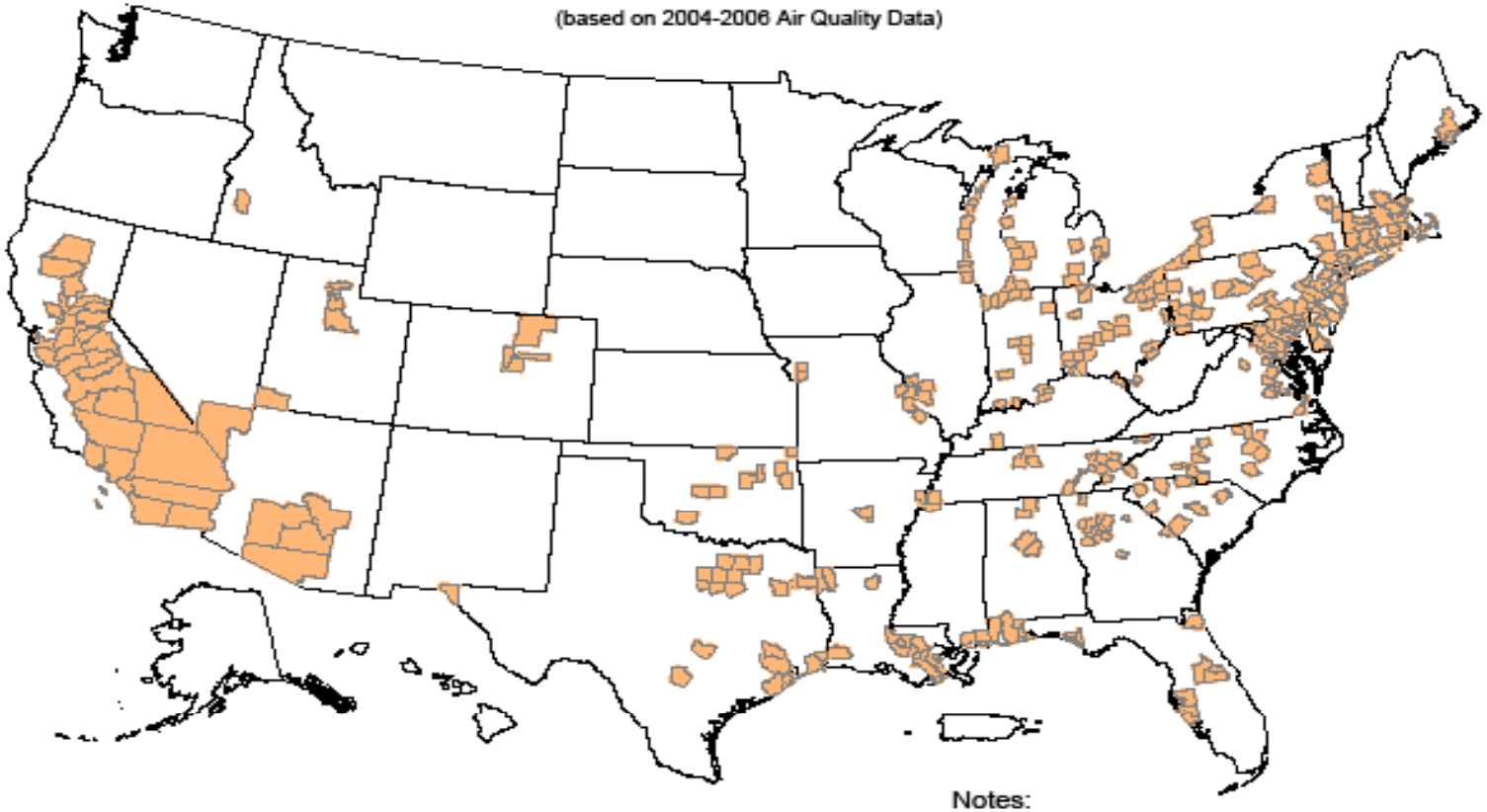
New Ozone Standard 2008

United States Environmental Protection Agency

Estimates are based on the most recent data (2004 – 2006). EPA will not designate areas as nonattainment on these data, but likely on data from 2006 – 2008 or later, which we expect to show improved air quality.

Counties with Monitors Violating the 2008 8-Hour Ozone Standard of 0.075 parts per million (ppm)

(based on 2004-2006 Air Quality Data)

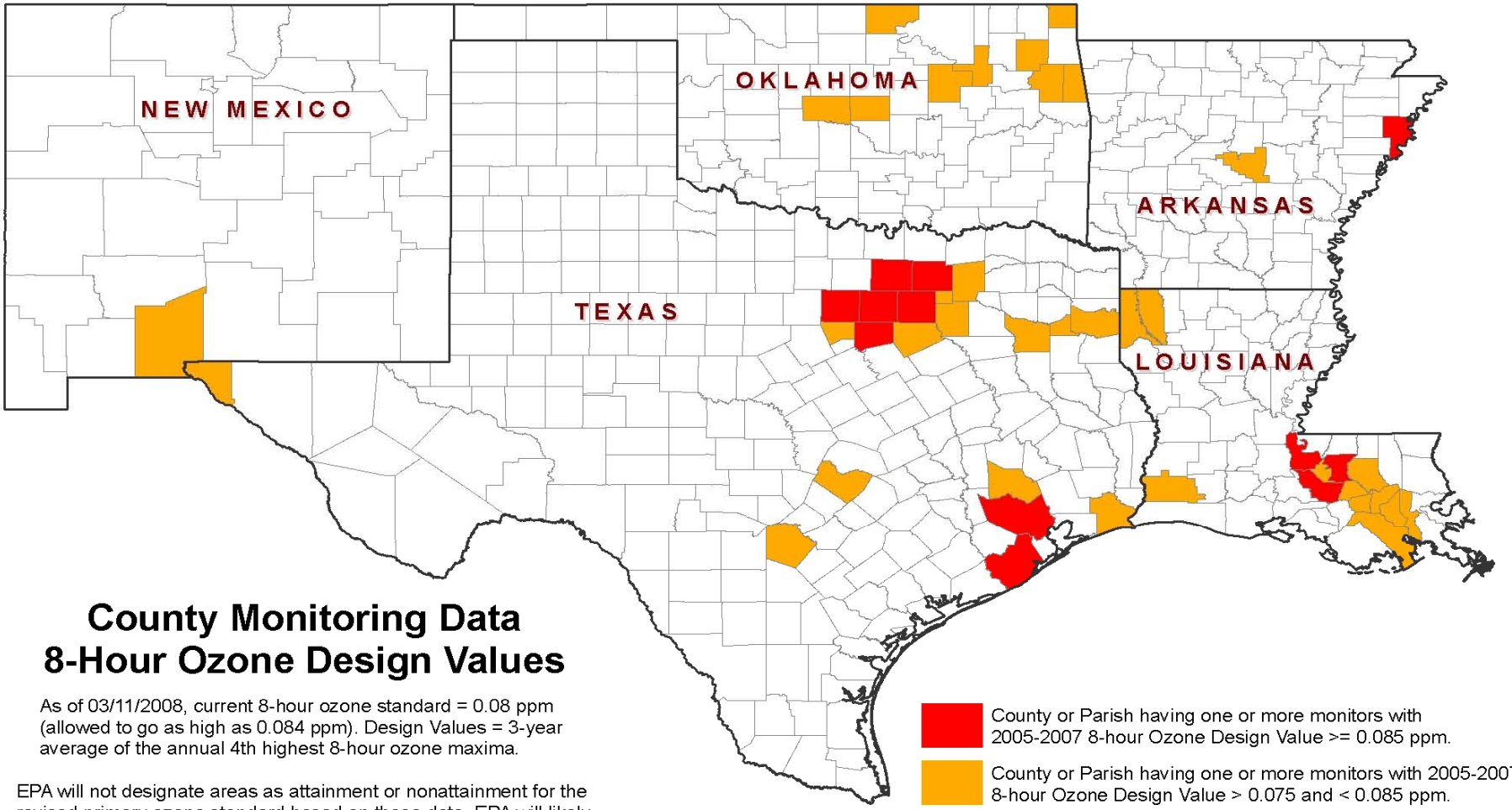


Notes:

[1] 345 monitored counties violate the 2008 8-hour ozone standard of 0.075 parts per million (ppm).

[2] Monitored air quality data can be obtained from the AQS system at http://www.epa.gov/ttn/airsaqs/

Ground Level Ozone



County Monitoring Data
8-Hour Ozone Design Values

As of 03/11/2008, current 8-hour ozone standard = 0.08 ppm (allowed to go as high as 0.084 ppm). Design Values = 3-year average of the annual 4th highest 8-hour ozone maxima.

EPA will not designate areas as attainment or nonattainment for the revised primary ozone standard based on these data. EPA will likely base these designations on air quality data from 2006 through 2008 or later, which is expected to show air quality continuing to improve.

County or Parish having one or more monitors with 2005-2007 8-hour Ozone Design Value >= 0.085 ppm.

County or Parish having one or more monitors with 2005-2007 8-hour Ozone Design Value > 0.075 and < 0.085 ppm.

EPA Region 6
GIS Support Team
March 11, 2008

20080311ML01

LOCKHEED MARTIN

Sources:
US EPA AQS Dataset and State Agency Monitors.

0 100 200 400
Miles

N
W E
S

Enforcement

- … not broken but changing
- … likely remain separate entity
- National Priorities – here to stay
- Region continue Air-centric path
- Metrics - no significant change
- Fewer cases - greater significance
- Activity numbers drop as targeting improves

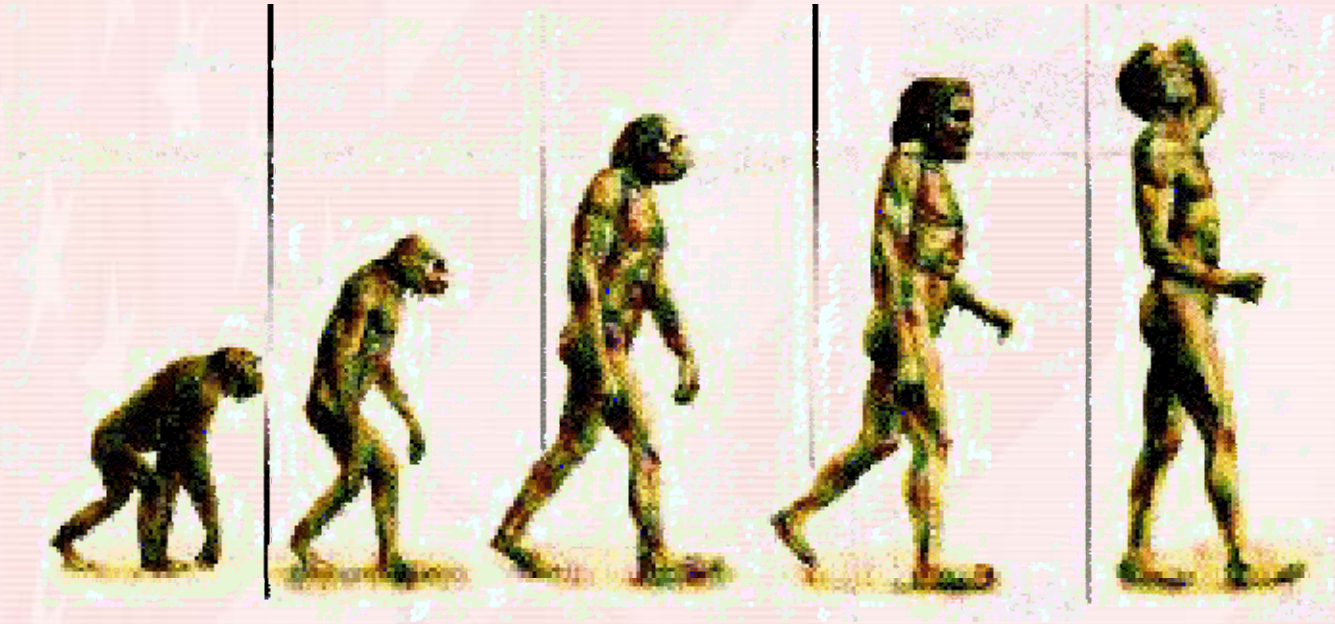
Main Points to Remember

- State Partnerships
- State Program Integrity
- Human Health Impact
- Environmental Impact/Benefit
- Cost of Injunctive Relief

And…
Know Our Operational Philosophy

- **Deference to States**
- **National Globals**
- **Regional Globals**

We are evolving . . .



- We want to be predictable
- We want to be consistent
- We want to be equitable
- We value strong state programs!

Partnership