

ODOR INVESTIGATIONS

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*How did we
get so
lucky?!?*

*Compliance
Monitoring
Strategy*



- Compliance Monitoring Strategy
 - Current – Title V and Synthetic Minors
 - Alternative – Sector based
- Legislative commitments
- Incidents
- Complaints

Knock- Knock!

Basic Process *Incidents / Complaints*

- Surveillance
- Opening conference
- Facility Site Tour
- Interview
- Records review
- Closing conference



Kicking off.

Opening Conference

- Formal or informal
- Inspection Plan – how conduct inspection, what order going to complete
- Facility operations overview
- Records review list
- Safety issues
- Permit requirements



Hit the Road!

Facility Site Tour



- Facility processes
- Emissions inventory
- In-field monitors (CEMS, meters, timers, valves, etc.)
- Control room(s)
- LDAR
- Photographs
- Monitoring – FLIR camera, multi-gas meters
- Sampling

Down the Rabbit Hole

Records Review



- Federal regulations
- State regulations
- Permit Requirements
 - Title V – Specific Requirements
 - Synthetic Minor – permit conditions
- 3-5 years retention
- Previous inspection

*Now we're
talking!*

*The
Interview*

- Facility site tour
- Records review
- Opening Conference
- Closing conference



Finishing Touches

Closing Conference

- Responsible Official
- Review observations
- Reiterate follow-up actions
- Photo copies/video copies
- Confidential Business Information/patent information



How'd we do?

- Inspection Report
- Review process
- EDMS
- Enforcement

Follow-up Information



Questions?

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