



**Creating Cleaner Air for Communities
National Compliance Initiative (CCAC NCI)**

**Small Business Environmental Assistance Program
Annual Training
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**Robert Lischinsky
Office of Compliance
U.S. EPA**

National Compliance Initiatives

- Focus on most serious environmental violations by implementing national program priorities
- Improve compliance with environmental laws while enhancing shared accountability between EPA and state/local/tribal agencies with authorized environmental programs
 - Implement consistent with the July 2019 “Enhancing Effective Partnerships Between the EPA and the States in Civil Enforcement and Compliance Assurance Work” ([Partnership Policy.pdf](#))
- Achieve Initiative goals by using full range of compliance assurance tools, including compliance assistance, self-audits, and informal/formal enforcement actions
 - Formal enforcement remains an important tool to address serious noncompliance and create general deterrence



Creating Cleaner Air for Communities NCI

- Focus on noncompliance resulting in excess emissions of either volatile organic compounds (VOCs) or hazardous air pollutants (HAPs)
- Concentrate efforts on:
 - Significant VOC sources having substantial impact on air quality adversely affecting area's nonattainment status or vulnerable populations
 - HAP sources having significant impact on air quality and health in communities
- FY 2020-2023 Cycle



Address Adverse Health and Environmental Impacts

- People living in non-attainment areas or in communities near HAP sources may face significant risks to their health and environment
- VOCs: key component in formation of ground-level ozone, may impact ecosystems and can cause adverse health effects like respiratory ailments
- HAPs: pollutants known or suspected to cause cancer or other serious health effects – small amounts inhaled or ingested can cause serious illness



CCAC NCI Scope

- Sources substantially impacting air quality that are adversely affecting vulnerable populations or an area's attainment status
- Focus on environmental problem(s) of populations exposed to VOC and HAP emissions – not targeting specific industries
- Address localized impacts as well as regional problems



CCAC NCI Goals

- Improve air quality by reducing excess emissions of VOCs and HAPs
- Address significant violations and achieve measurable pollutant reductions at NCI inspected sources to improve air quality thereby delivering cleaner, healthier air for communities
- Improve air quality and overall compliance with the Clean Air Act through collaboration with states and development of the full range of compliance assurance tools
 - Compliance assistance, capacity building as well as traditional enforcement



Available Tools to Advance Compliance

- Enforceable orders to reduce unlawful releases and/or excess emissions of both VOCs and HAPs
- Compliance assurance tools and innovative techniques to promote compliance and supplement enforcement
 - Compliance advisories/enforcement alerts (e.g., [Pigging Alert](#))
 - [Compliance Assistance Centers](#)
 - Audit Programs (e.g., [Oil and Natural Gas New Owner Audit Program Policy Development Documents](#))
 - CAA trainings/webinars/outreach materials on selected rules and processes
 - [Applicability Determination Index \(ADI\)](#)



State Engagement

- Build capacity to address NCI concerns and increase compliance
- Engage with states through:
 - Information sharing
 - Technology transfer
 - Training
 - Joint compliance monitoring and enforcement activities
- Collaborate with national associations and multiregional jurisdictional organizations



State Engagement (cont.)

- Encourage active state participation to evaluate compliance
 - Joint efforts to assist states build their capabilities
 - Intended to help states take lead in future inspections
- Confer on which agency should take the lead on enforcement
- Joint plaintiffs



Training

- Conduct basic inspector training and specific subject matter courses
- Training on advanced equipment to support state inspections
- Sharing inspection findings from Direct Implementation inspections
- Inspector training on various complex CAA regulations such as:
 - Boilers, RICE, sewage sludge incinerators, asbestos, secondary aluminum
- Inspector Wiki: <https://inspector.epa.gov>
- FedTalent: <https://epafedtalent.ibc.doi.gov/login/index.php?saml=off>



Challenges

- Ensuring level playing field nationally requires close State collaboration
 - Prevent competitive advantage for noncompliant sources
- Building/maintaining State capacity when agencies are experiencing reduced funding and staff turnover
- COVID-19