

Feedback Session 4: Alternative Compliance Demonstration Strategies
September 7, 8:30-10:00 a.m., Tower Court B

Facilitator: Sara Terry, U.S. EPA, Office of Air Quality Planning and Standards

General Discussion Topic: How can demonstrating compliance be designed to promote better environmental results?

Background:

Clean Air Act compliance requirements are typically established in regulations and in permit conditions. These requirements are necessary to (1) inform the source about what it must do to comply with applicable requirements and (2) allow the regulator to determine the compliance status of the source. Situations may exist where a source has reduced emissions beyond what is currently required by regulation and believes that simpler more streamlined monitoring, recordkeeping, and reporting requirements are appropriate. Alternative compliance demonstration methods that consider emission control options or strategies that achieve environmental results superior to what is otherwise required may be a possible way to support such additional emissions reductions.

Specific Questions for Discussion:

1. Are you aware of alternative compliance demonstration methods or strategies that would serve to promote emission reductions? What are they?
2. What specifically has prevented you from taking advantage of these alternative compliance demonstration methods or strategies?
3. Are you aware of examples in which there was confusion or ambiguity regarding an applicable compliance demonstration method?
4. How can compliance demonstration methods be structured to promote levels of emissions reductions beyond currently required levels?