

OUTCOME NOTES

Feedback Session 4: Compliance for Environmental Results: How can compliance demonstrations be designed to promote better environmental results and reduce the associated administrative burden to the source?

Please focus the discussion to provide a short list of “headlines” (primary issues, major problems, demonstrated successes to emulate, etc.) and recommendations for EPA action (program or tool development, facilitation of State action, etc.).

SESSION “HEADLINES”:

- There is an established mindset for how things are done, and this is a barrier to change.
- Regulatory changes would be needed to allow flexibility.
- The current system does allow for some flexibility, but some always question whether a new approach has the full “blessing” of the regulatory agency.

RECOMMENDATIONS FOR ACTION (Declarative Statements):

- Use a fee schedule where facilities pay a per-ton cost for pollutants actually emitted (Louisiana model).
- Give a longer permit period for good actors.
- Reduce monitoring and reporting burdens for facilities that have a good historical record of compliance.
- Provide flexibility to facilities that use better pollution control technologies or less polluting processes.
- Include language in statutes that allow facilities to apply for an alternative compliance strategy.
- Engage facilities in a discussion of these questions.