Full Compliance Evaluations

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EPA’s Compliance Monitoring Strategy

Purpose of the Compliance Monitoring Strategy (CMS):

• Provide national consistency in stationary source compliance monitoring, while allowing local flexibility;

• Improve communication between EPA, state and local agencies;

• Develop compliance monitoring programs that focus on achieving measurable environmental results;

• Establish a consistent level of evaluation coverage and environmental and public health protection

• Full Compliance Evaluations (FCEs) are the primary tool of the CMS
What is a FCE?

- EPA’s gold standard for determining:
  - Facility’s overall compliance with all applicable federal, state, and local regulatory requirements; and
  - The continuing ability of the facility to maintain compliance

- The FCE:
  - More than just an on-site inspection
  - Comprehensive evaluation to assess compliance of the facility as a whole
  - Results in a compliance determination
  - Addresses all regulated pollutants and emission units
FCE: The Pre-Inspection File Review

• Have all permit-required reports and notifications been submitted?
  • Emission Reports: Annual/Quarterly/Monthly
  • Title V Annual Compliance Certifications and Semi-Annual Monitoring Reports
  • MACT/NSPS Reports and Notifications
  • Stack Testing Notifications and Reports
  • Malfunction and Excess Emissions Reports

• In compliance with permitted emission standards and limits?
  • Emission Report Reviews
  • Stack Test Report Reviews
  • Monitoring Reports
FCE: Inspection Day

Are processes and control devices operating as expected and in compliance with the permit?

• Process parameters: e.g. feed rates, raw material compositions, and process rates
• Control equipment performance parameters: e.g. pressure drop, temperature, flow rates
• Facility records and operating logs review
• Visible emissions observations, as needed
FCE: Documenting the Results

- MCAQ’s Facility Inspection Report
- For Title V and Synthetic Minor Facilities:
  - Compliance status is reported into EPA’s national compliance database – Integrated Compliance Information System (ICIS)
    - Inspections
    - Stack Tests
    - Enforcement Actions (i.e. NOV’s)
  - Compliance status is available to the public through EPA’s Enforcement and Compliance History Online (ECHO) system: [https://echo.epa.gov/](https://echo.epa.gov/)
Questions?

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