

# Avoiding Violations and Compliance Tips

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# Discussion Topics

- 10 Sources of Deviations or Violations
- Understand Your Permit
- Understand Your Process and Regulations
- Compliance Calendars
- Demonstration Tables
- Check Lists/Organization

# 10 Ten Causes of Deviations or Violations

- Failure to maintain or submit required records or reports
- Failure to perform required monitoring
- Failure to obtain a construction permit or approval
- Failure to obtain an air emissions operating permit
- Failure to conduct required performance testing

# Top 10 Causes of Deviations or Violations

- Failure to install, maintain or operate required pollution control equipment
- Open burning violations
- Visible emissions violations
- Excessive emissions of regulated pollutants
- Failure to comply with requirements of an enforcement action

# Tip 1: Understand Your Permits

- Read and understand your permits
  - Special Conditions
  - Applicable Regulations
  - Required an Operating Permit Application
  - Monitoring/Recordkeeping Requirements
- Understand the application

## Tip 2: Process and Regulations

- Process knowledge is key
- Regulatory applicability
- Basis for specific permit conditions
- May contain requirements not applicable to your facility
- May offer opportunities for streamlining / permit hygiene

## Tip 3: Compliance Calendar

- Calendars are your best friend.
  - What tasks are due when?
  - Recurring tasks
  - Add lead time
  - Notification
  - Add time for response/absences

## Tip 4: Compliance Tables

- Work Smarter
  - Automate the process
  - Capture data at source
  - CEMS/Dataloggers
- Track requirements and current status
- Incorporate flags

## Tip 5: Checklists/Organization

- Keep checklists
- Keep paper copies by media
- Know the records retention requirements

# Who to turn to?

- Internal
  - Maintenance/Operators
  - Management
  - Data sources
- External
  - MoDNR APCP
  - Trade associations
  - Consultants