



Air Enforcement Data & Trends 2008 - Present

Air Enforcement Program

Compliance Assurance

- Provide compliance assistance
 - SIPRAC
 - Training & Workshops
 - Fact Sheets
- Inspections
 - Title V & GPLPE
 - Stage II
 - Special Initiatives
- Emission testing & monitoring
- Enforcement



Traditional Enforcement

- Recognized environmental benefits of assuring compliance with regulatory requirements;
- Ensures level playing field for regulated community;
- Provides appropriate deterrent to ensure compliance.

Enforcement Response Policies

- The CT ERP sets forth a violation classification system and our enforcement response procedures;
- Imposes timeliness for addressing violation;
- EPA's "Timely and Appropriate (T&A) Enforcement Response to High Priority Violations (HPVs)".

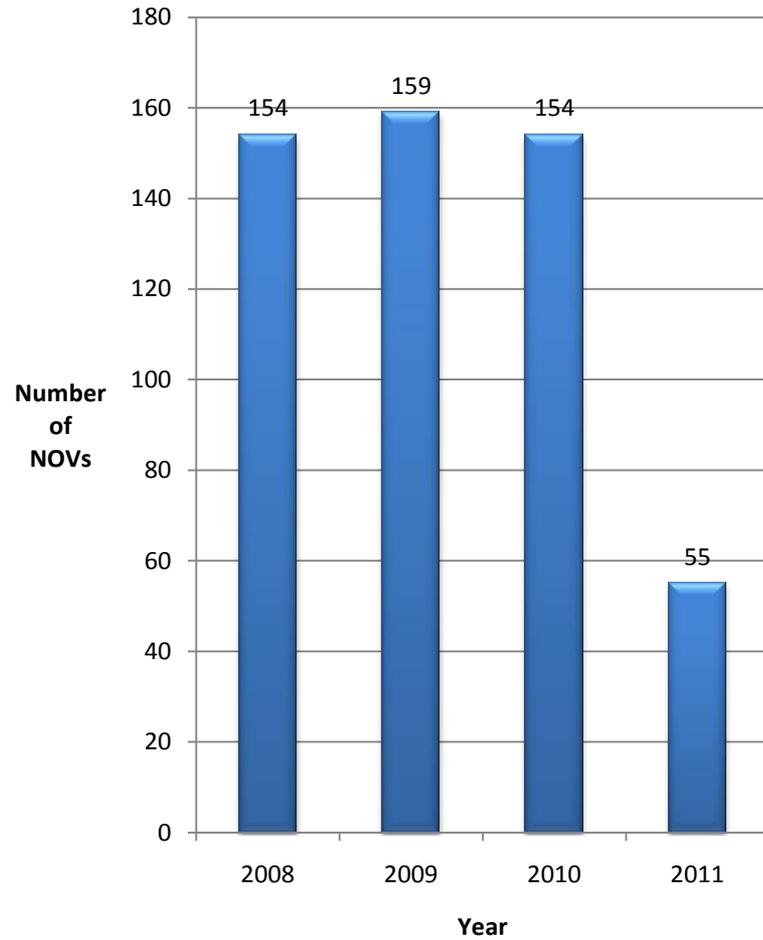
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graph TD; A[Enforcement Responses] --> B[Informal Response]; A --> C[Formal Response]
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Enforcement
Responses

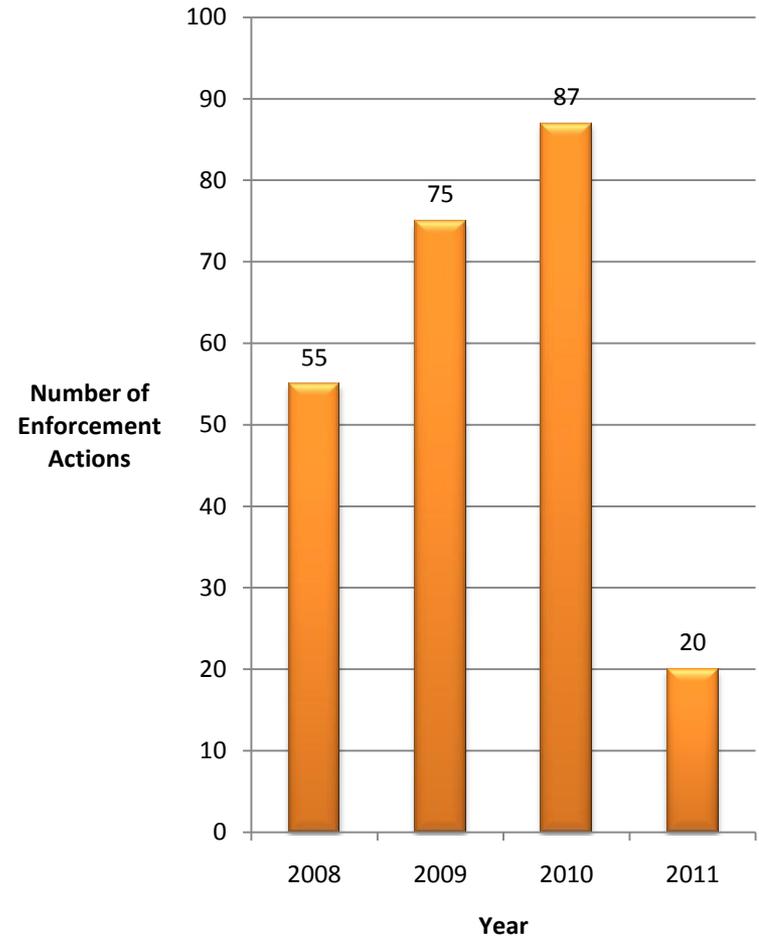
Informal
Response

Formal
Response

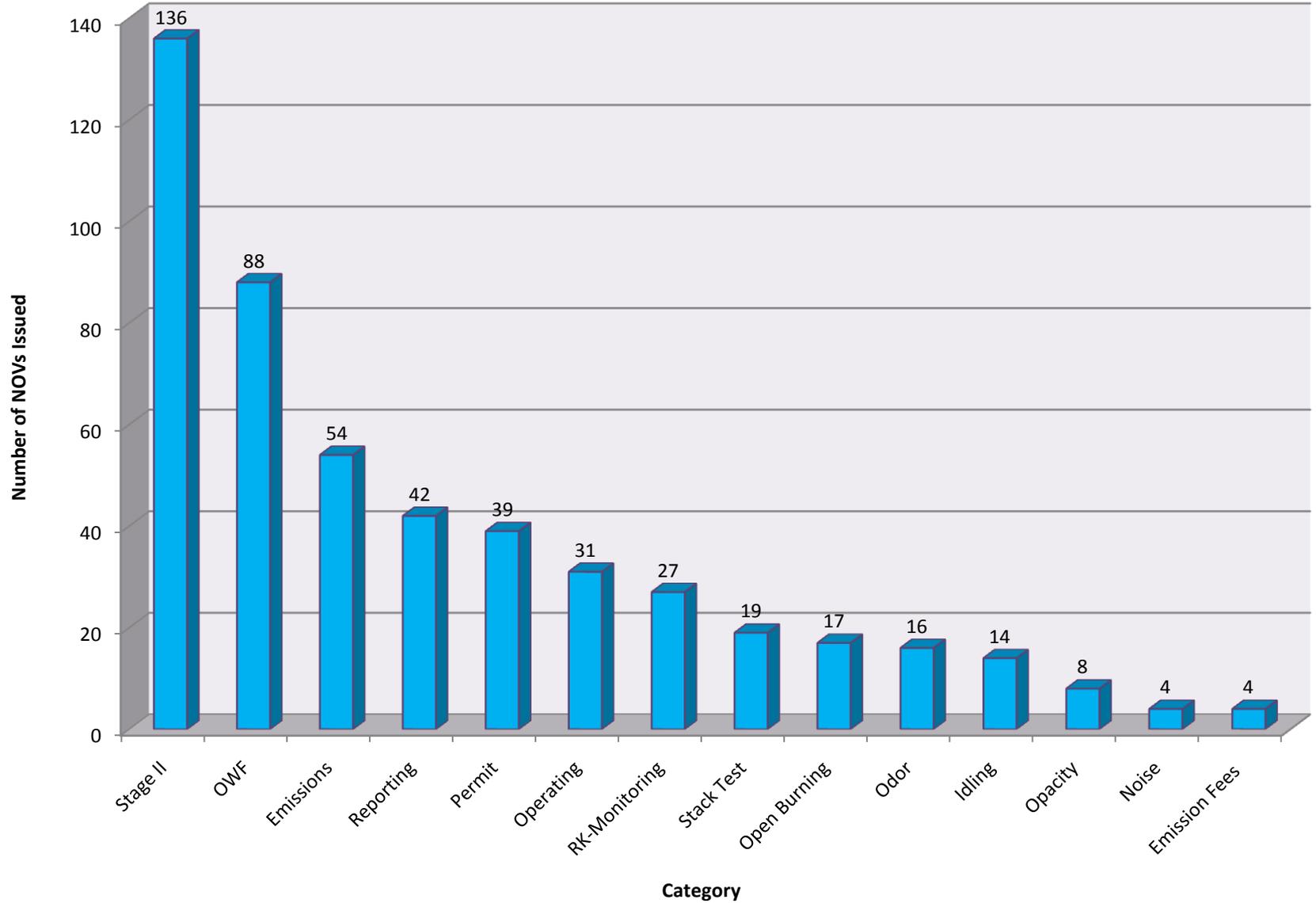
Informal Enforcement Actions by Year: 2008-Present



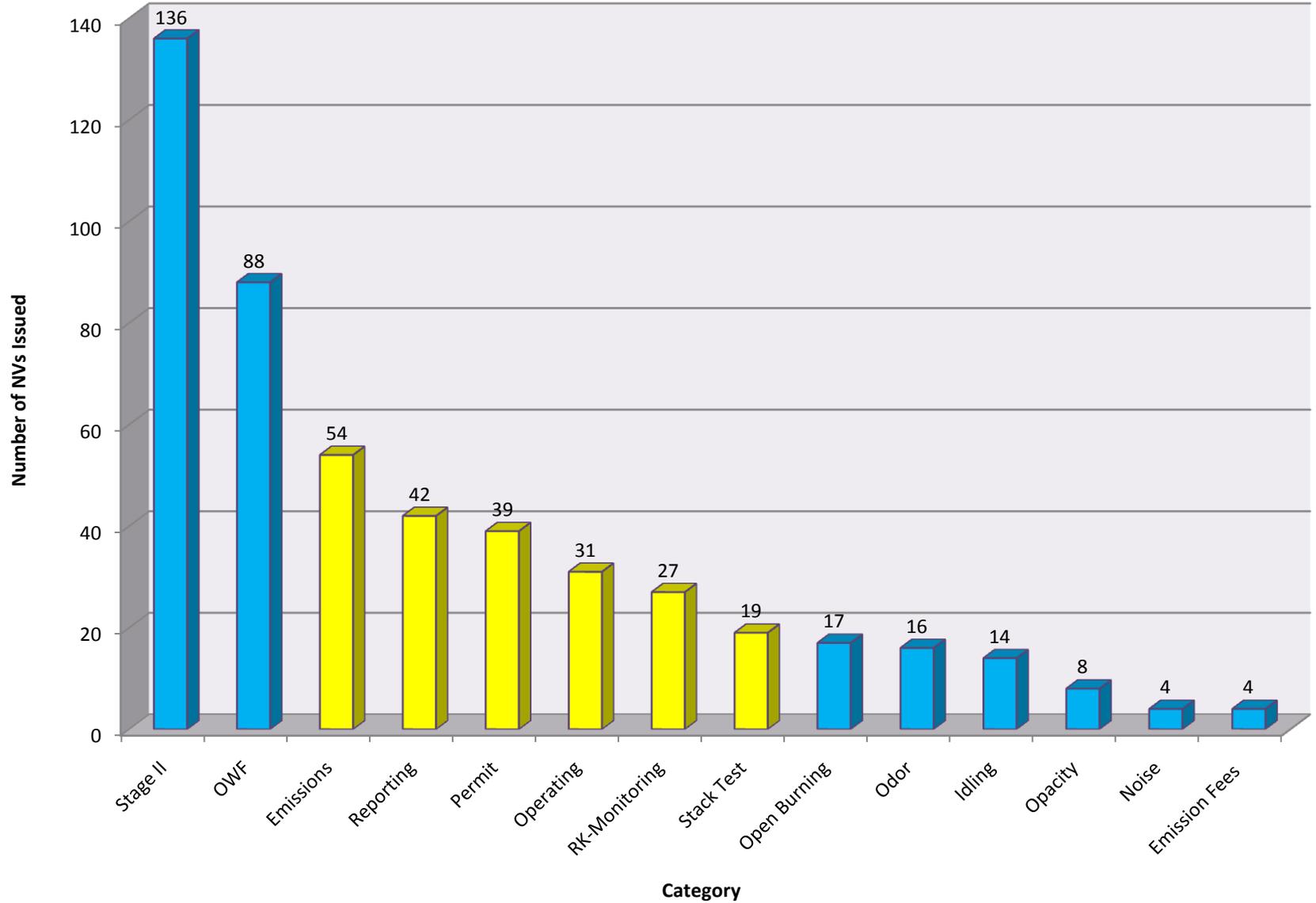
Formal Enforcement Actions by Year: 2008-Present



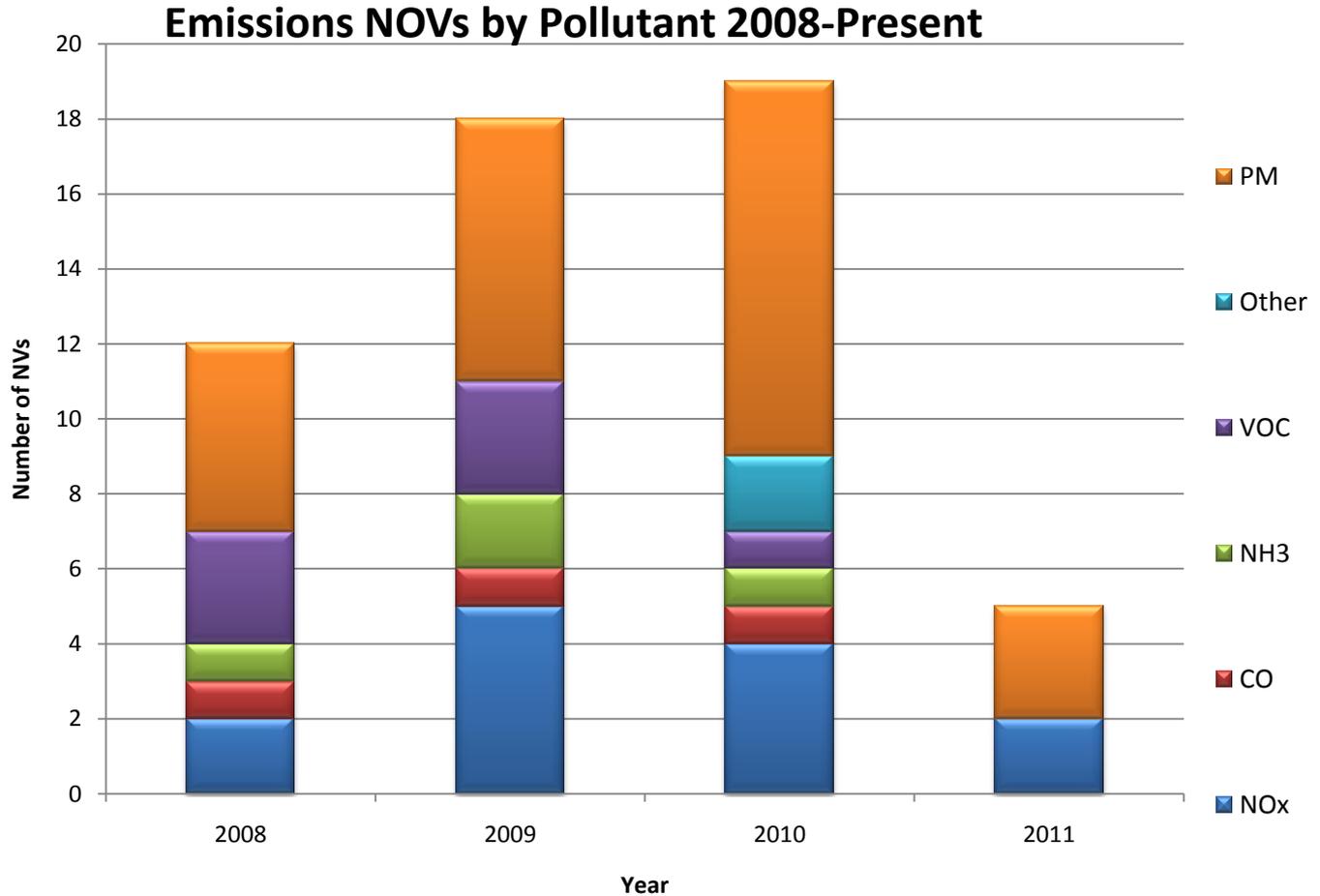
Number of NOVs Issued for Each Category: 2008-Present



Number of NVs Issued for Each Category: 2008-Present



Emissions Violations



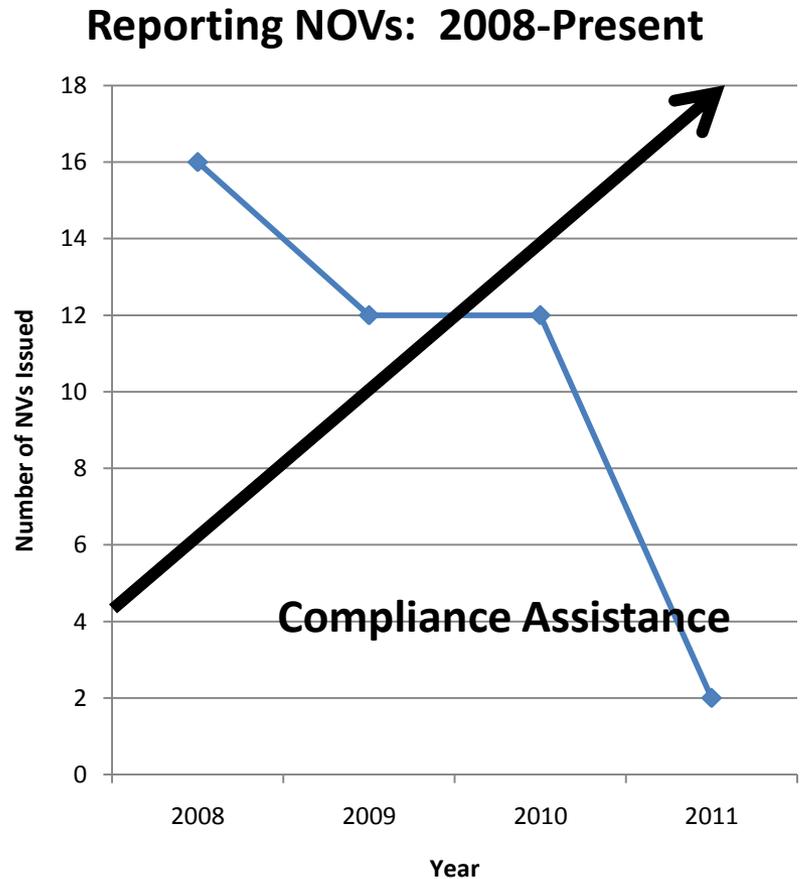
Other: SO₂, dioxin/furans

Emissions Violations

- PM data includes 20 violations of Section 22a-174-18 (airborne particulate) at multiple sites;
- 34 remaining emission violations occurred at 18 sources;
 - Multiple violations for same pollutant at one source;
 - Multiple violations for one or more pollutants at one source;
- Emission violations led to seven formal actions

Reporting

- Failure to submit GPLPE Compliance Certification and/or Annual Emission Summary (27)
- Failure to submit reports required by Title V permit (7)
- Failure to submit new or renewed NOx Compliance Plans (5)



Permitting

- Failure to apply for permit (85%)
- Failure to transfer permit (10%)
- Begin construction activities prior to permit issuance (5%)

Failure to Apply	
Year	Number of NOVs
2008	11
2009	12
2010	4
2011	5

2008: GPLPE renewals

2009: Four sources w/multiple NOVs

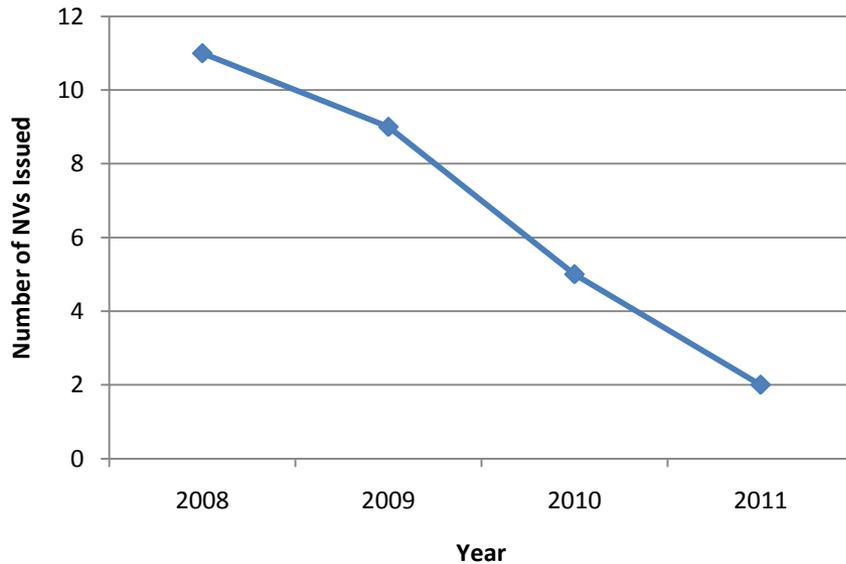
Operations and Work Practices

- Violations of operating limits: fuel consumption, charging rate, etc;
- Violations of NSPS or MACT requirements: work practices;
- Excessive hours
- Operating EE on a unhealthy day

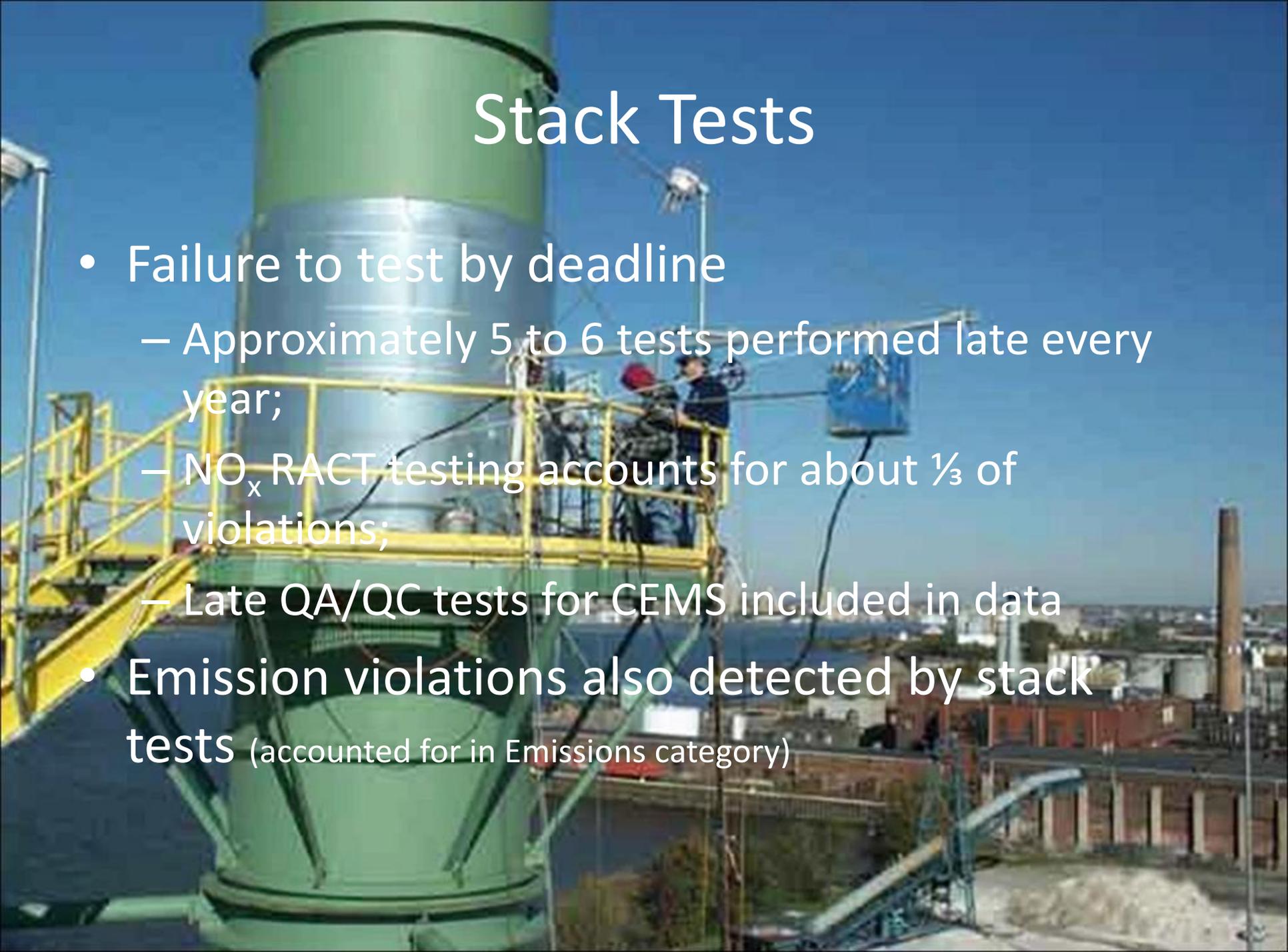
Year	Number of NOVs
2008	6
2009	13
2010	6
2011	7

Monitoring & Recordkeeping

**Recordkeeping & Monitoring NOVs:
2008-Present**



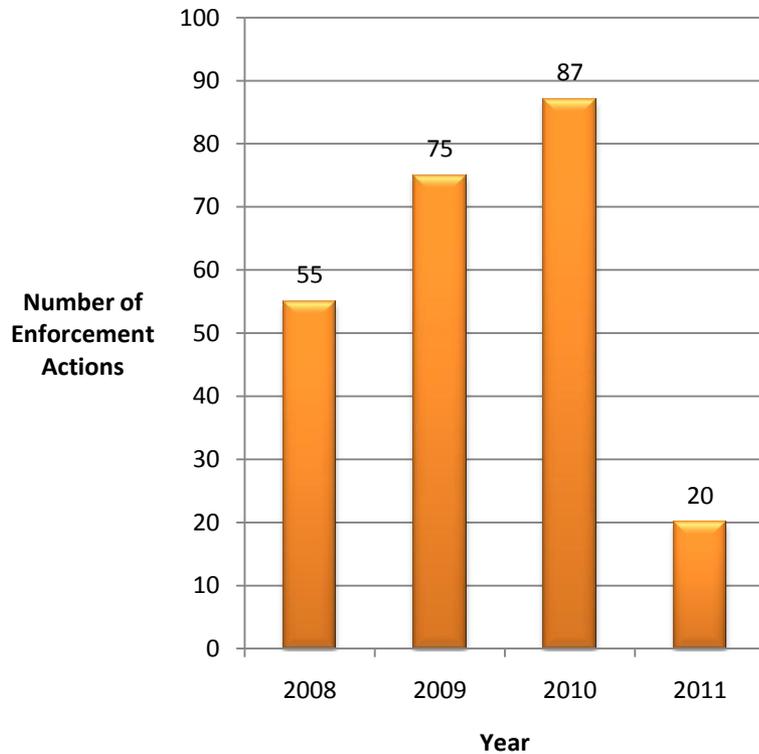
Stack Tests



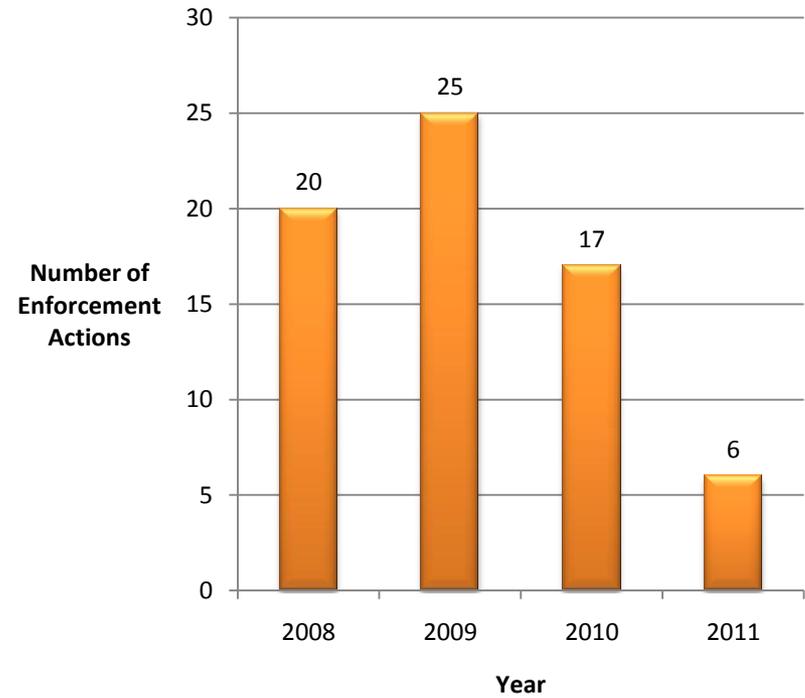
- Failure to test by deadline
 - Approximately 5 to 6 tests performed late every year;
 - NO_x RACT testing accounts for about 1/3 of violations;
 - Late QA/QC tests for CEMS included in data
- Emission violations also detected by stack tests (accounted for in Emissions category)

Formal Enforcement

**Total Formal Enforcement
Actions by Year: 2008-Present**



**Formal Enforcement Actions at
Stationary Sources by Year:
2008-Present**



Formal Enforcement

- Decision to issue a formal action is determined primarily by applying State and Federal ERPs;
- Data indicates that violations of a Title V permit and/or NSR permit requirement have a higher incidence of formal enforcement;
- 81% of formal actions have monetary penalties;

Conclusions

- Outside of Stage II and OWF actions, the overall enforcement trend is stable with a slight downward trend in some categories for stationary sources;
- Emissions testing on time needs improvement;
- Higher probability of formal enforcement for emissions violations;
- Failure to apply for permits is trending upward in 2011 after decreasing for two years.

Moving forward

- Goal of both the regulated community and the Air Bureau is to achieve compliance;
- Regulated Community: Improve methods & procedures for maintaining compliance;
- Air Bureau: Compliance assistance and outreach opportunities.

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