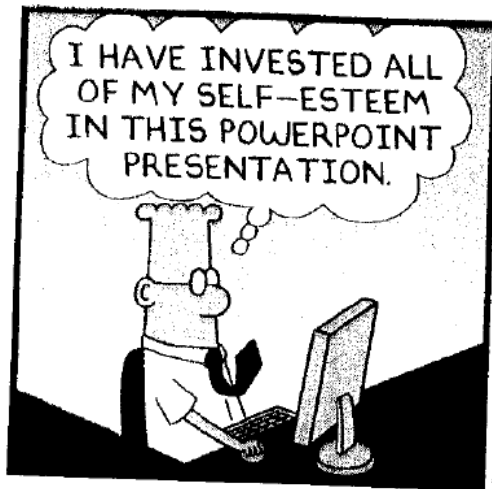




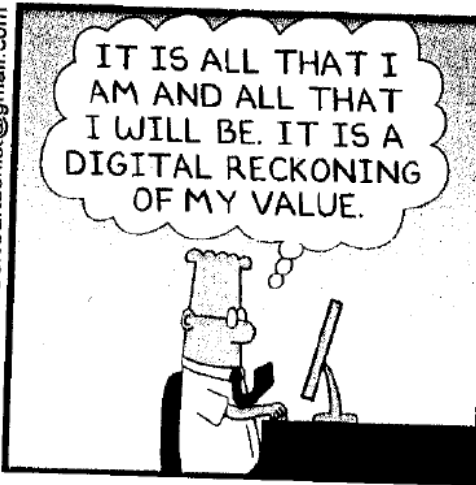
How to see the Forest and the Trees and Safely Navigate through the Complex Environmental Regulatory Matrix!

S. S. R. Pappworth, P.E.

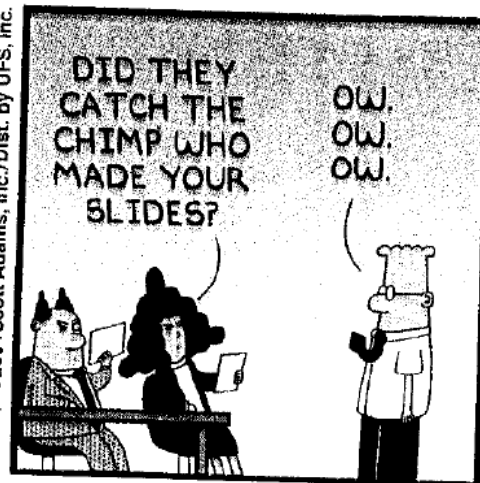
Sound Environmental Solutions, Inc.

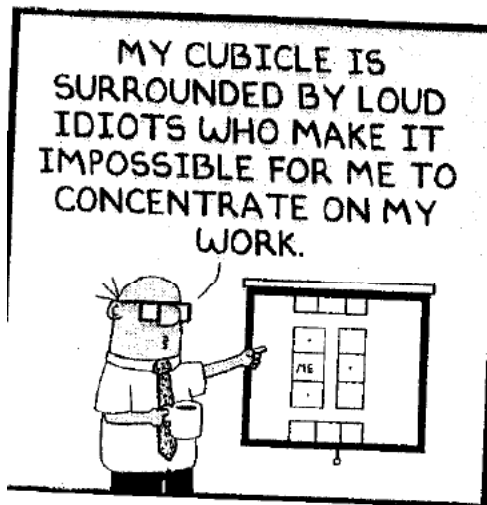


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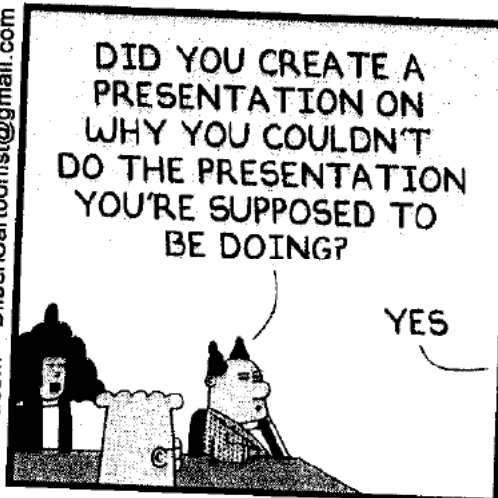


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- The paper will address the increasingly complex matrix that environmental regulations have become; and
- Will provide some practical strategies on how to successfully navigate through the maze.



- The early environmental regulations typically only required the affected entity to state that they would comply with the requirements.
- As the regulations evolved, the requirement to provide initial proof of compliance was added, e.g. an initial stack test.



Regulatory Development

- The next step was to require demonstrations of ongoing compliance. This includes, for example, conducting periodic stack tests on compressor engines and/or installing continuous monitors.



Multi-Media and Agencies

- Adding to the complexity are the different media covered by regulations including:
 - Air,
 - Water, and
 - Waste
- As well as such areas as:
 - Community Right to Know, and
 - Emergency Planning



Multi Agency Involvement

- To make things more interesting there are also often multiple agencies involved, including:
 - Federal (e.g. EPA, OSHA, DOT)
 - State (e.g. TCEQ, TRRC, LDEQ, LDNR)
 - Local (e.g.
 - Reporting
 - Recordkeeping



Multiple Programs

- Each regulatory area typically has a number of programs, e.g.:
- **For air**
 - NSPS
 - NESHAPS
 - MACT
 - RACT
- **For water:**
 - Effluent Guideline
 - Pretreatment Standards

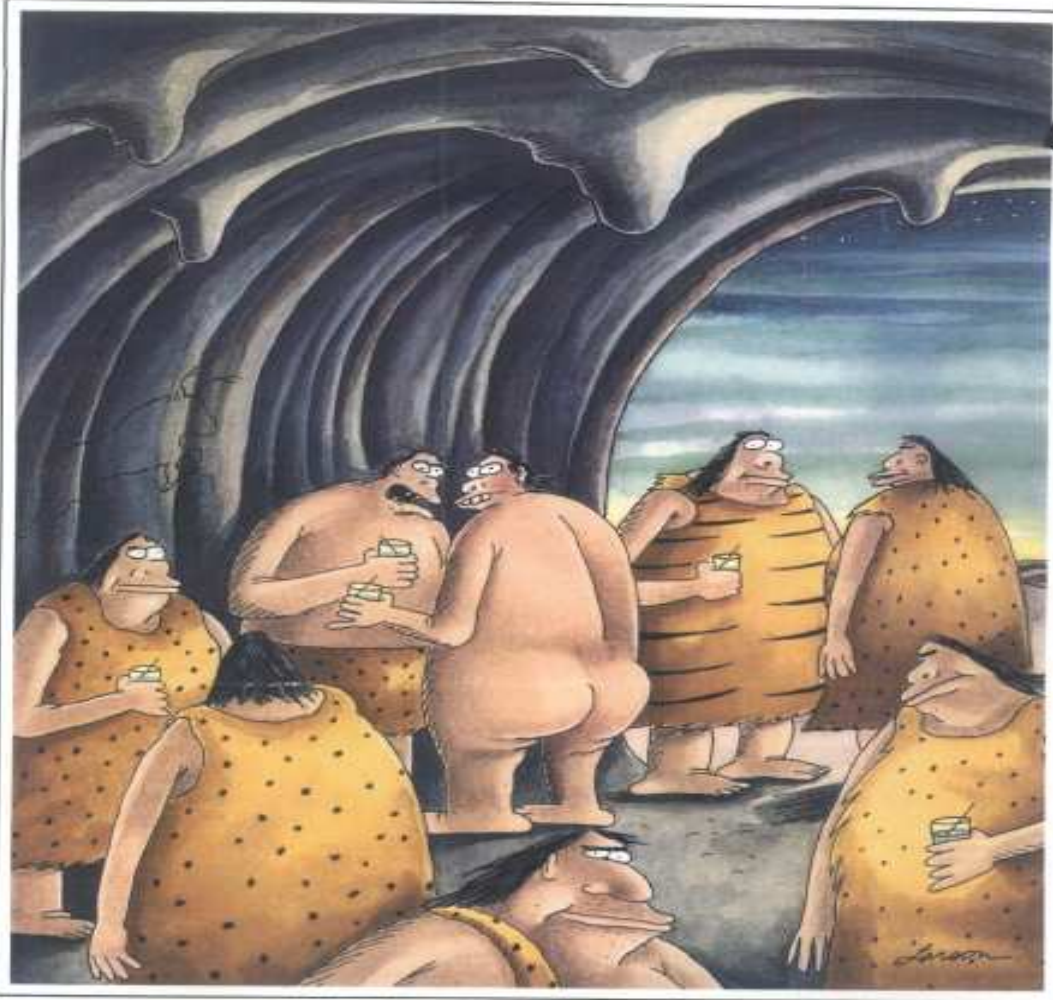


Coping Strategies - Planning





Understand the Current Requirements



"A word of advice, Durk: It's the Mesolithic. We've domesticated the dog, we're using stone tools, and no one's naked anymore."

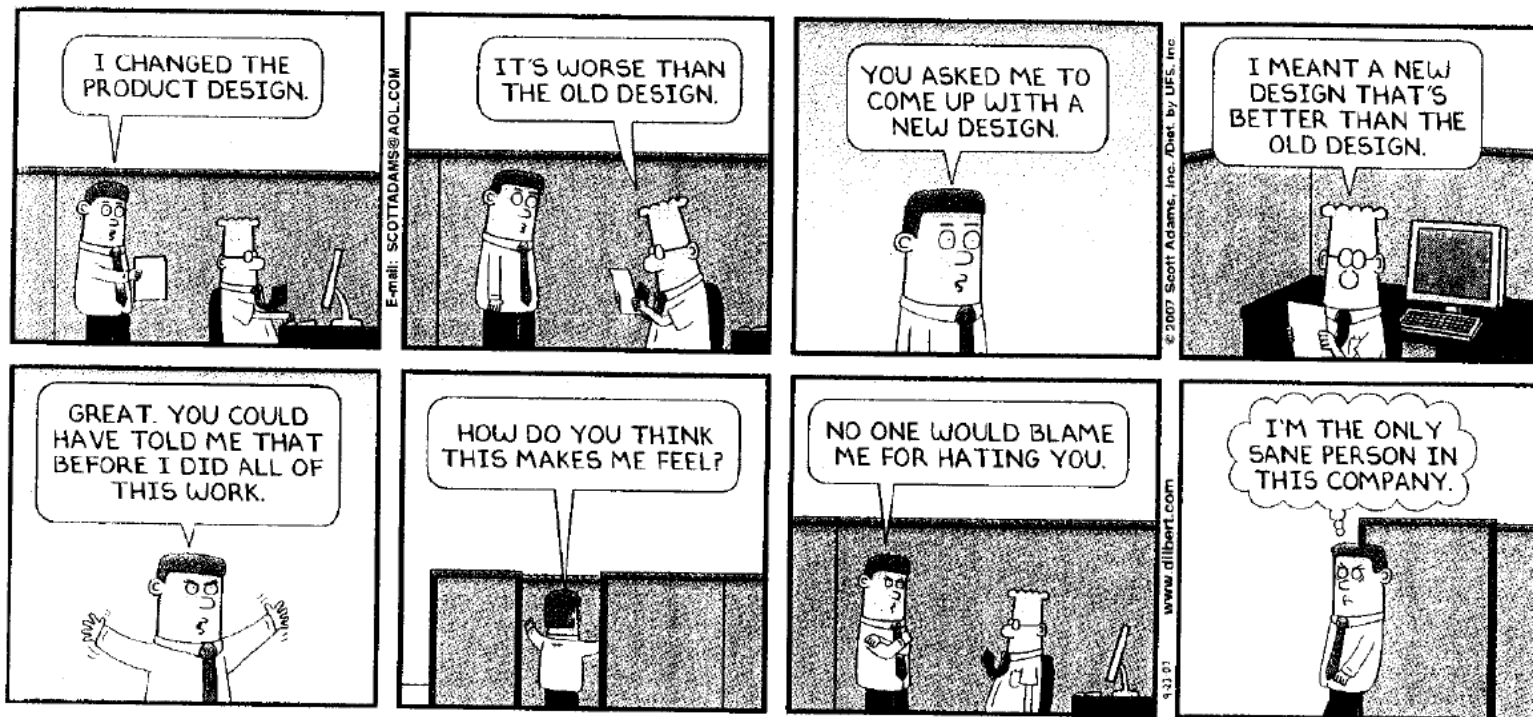


Get Competent Trained Personnel





Trained Personnel (cont.)

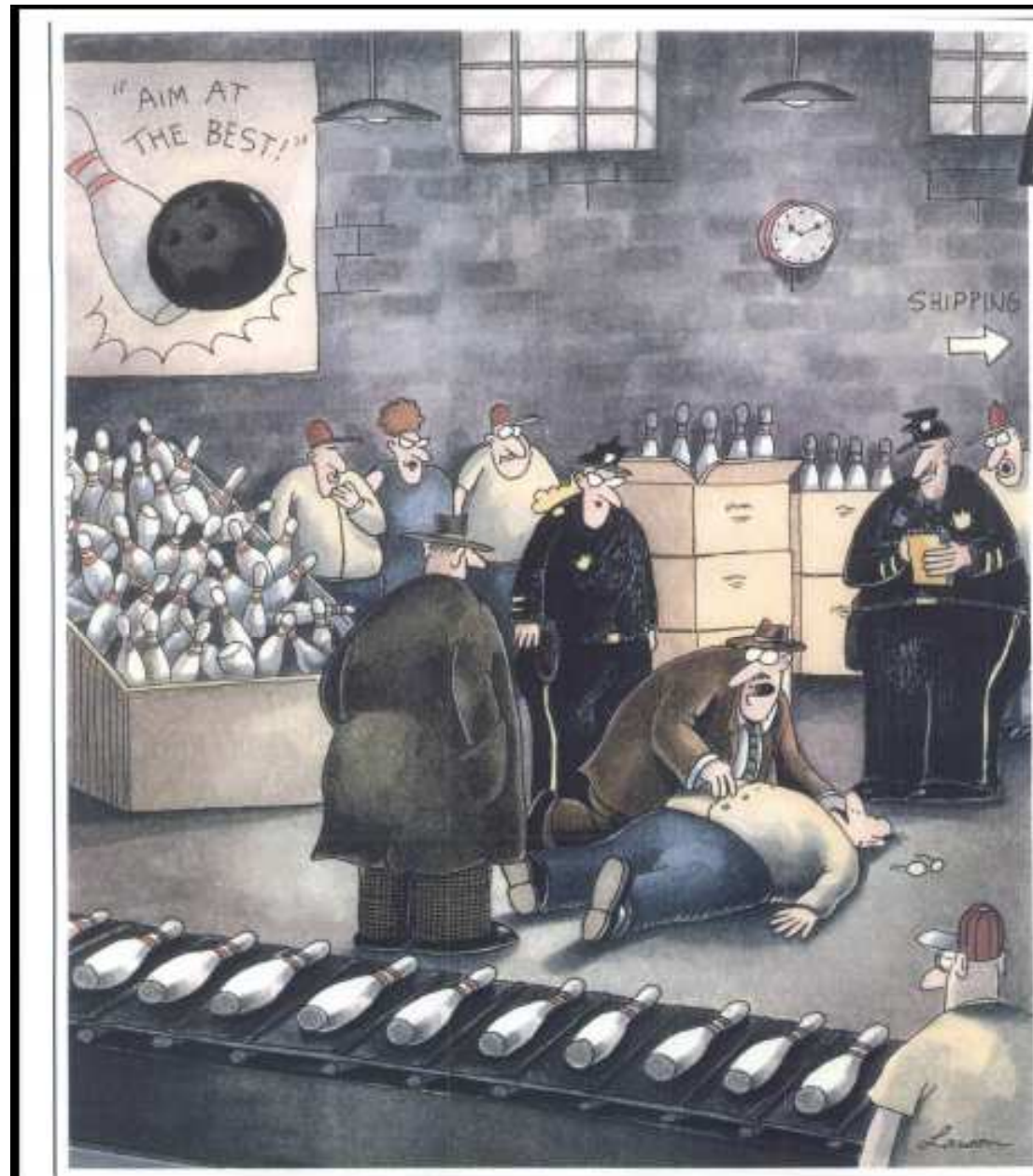




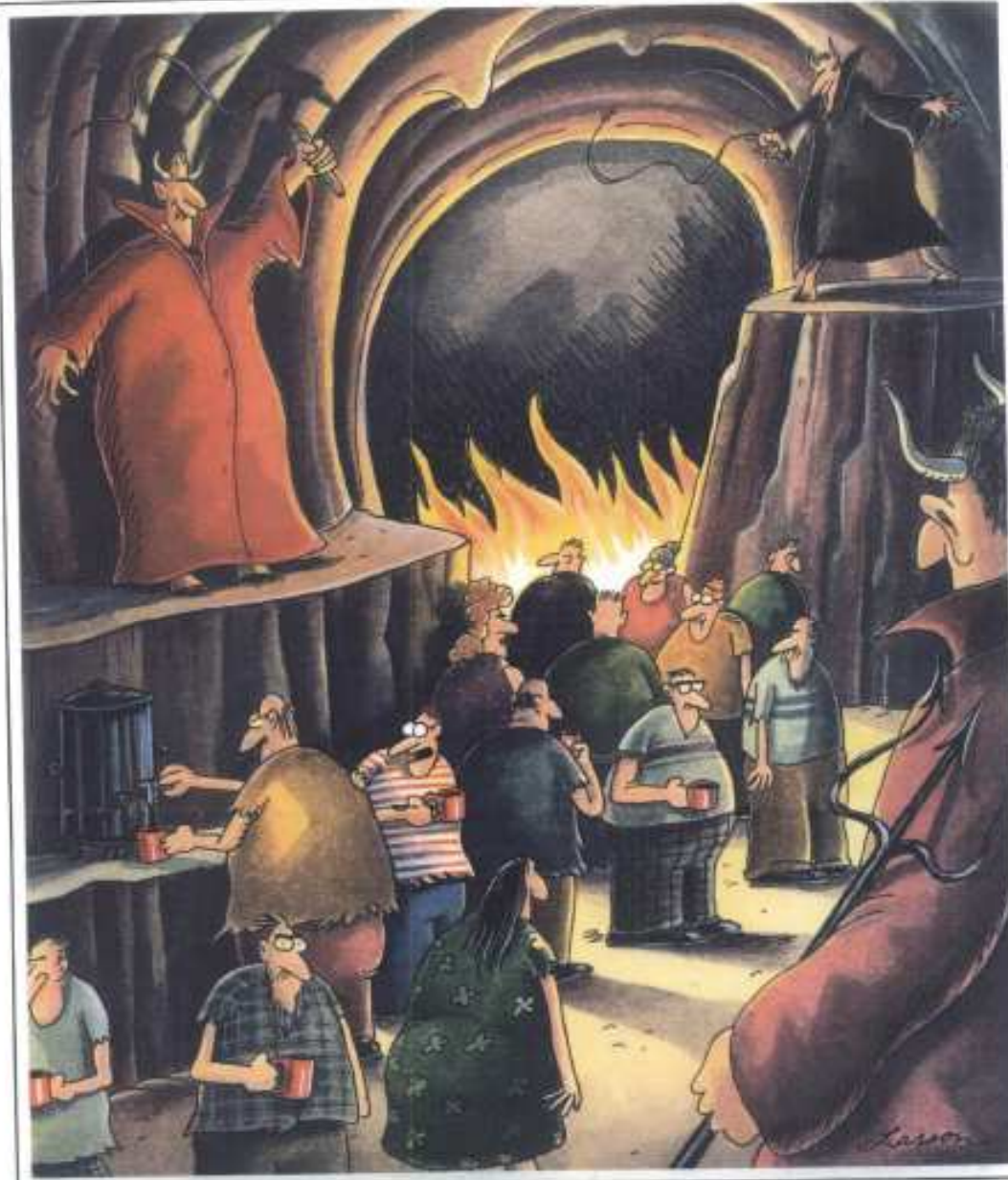
Identify the Applicable Requirements and Timing

It is really important to clearly identify, define and understand:

- The phases of the project
- The regulatory requirements
- The project timeline
- The regulatory timeline



"Struck from behind, all right ... and from my first examination of the wound, I'd say this was done by some kind of heavy, blunt object."



"Oh, man! The coffee's cold! They thought of everything!"



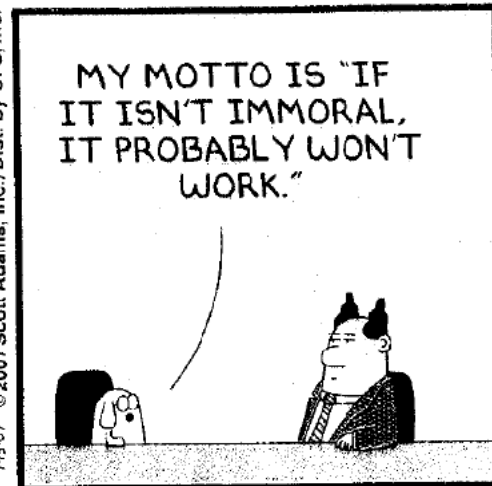
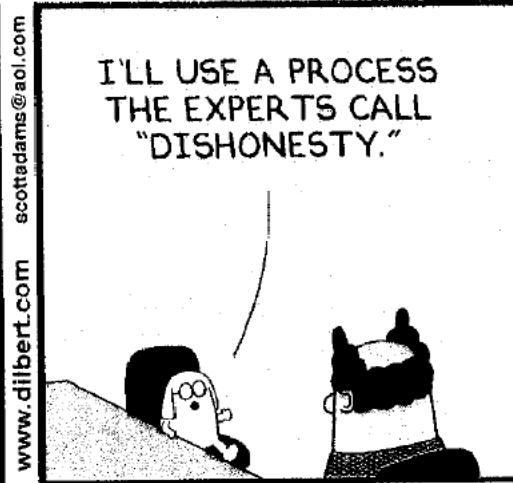
Identify Critical Path Items

- Before starting the project develop a critical path timeline to identify potential roadblocks.
- Develop strategies to ensure that the required permits and authorizations are obtained in a timely fashion so as not to delay the project.



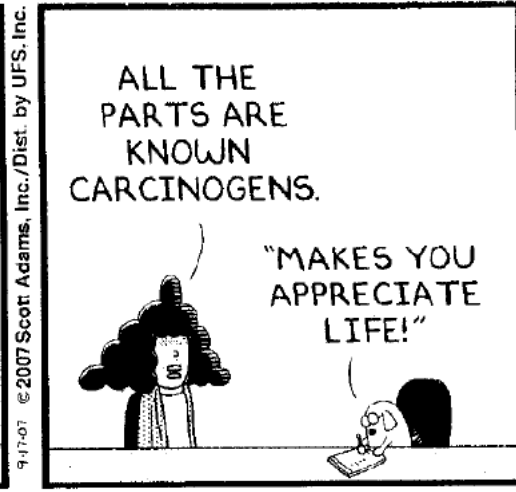
Do Missionary Work with The Agencies

- Develop a good working relationship with the agencies.
- Identify and understand the permit and compliance team's goals, requirements and hot button items.
- Explain your project clearly and concisely.



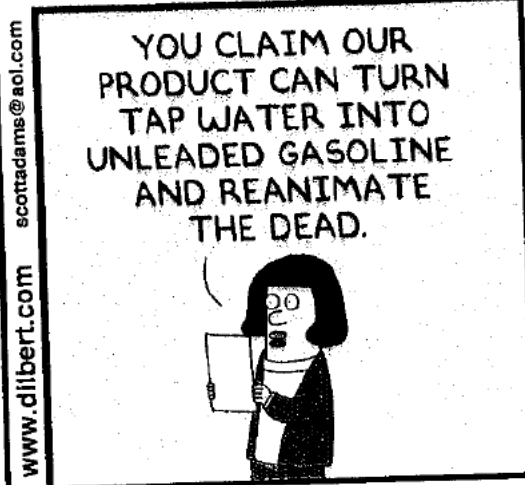
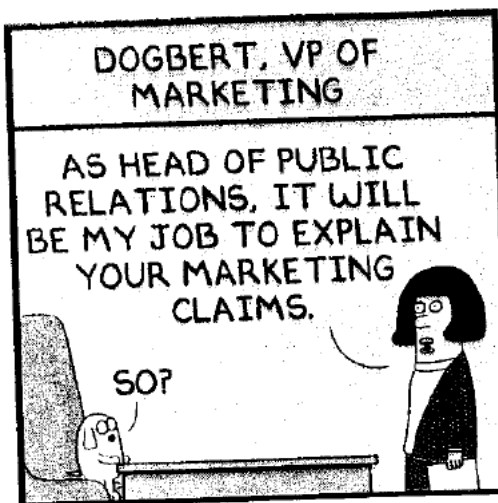
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Identify and Include Stakeholders

- Identify the Stakeholders and, where appropriate, include them in the planning and development phases.
- This allows you to identify and address potential issues before they result in costly delays.



Be Flexible

Conduct periodic reviews of the project and update/modify the strategy and steps if and when needed.



Questions?

