Compliance Pitfalls/Where Facilities Get Tripped Up: Jesslynn Hale (Trinity Consultants) Arkansas Environmental Federation Air Seminar Presentation



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Jesslynn Hale undertook a presentation at the Arkansas Environmental Federation Air Seminar titled:

Compliance Pitfalls: Where Facilities Get Tripped Up ("Presentation").

Jesslynn has a B.S. in Chemical Engineering from the University of Arkansas and is a Managing Consultant at Trinity Consultants.

The objectives of her Presentation included:

- Identify common compliance pitfalls.
- Understand why they occur.
- Learn practical prevention strategies.
- Reduce enforcement risk.
- Time for questions.

The Presentation initially addressed the events during an Arkansas Inspection which include:

- Records review.
- Site walkthrough.
- Data verification.
- Staff interviews.

Arkansas inspection trends were noted that include:

- Recordkeeping deficiencies.
- Monitoring not aligned with permit.
- Late/inaccurate reporting.
- Permitting misunderstandings.
- Poor internal communication.

The possibility that issues can become subject to enforcement were addressed, describing inspection findings and Consent Administrative Orders.

Pitfalls addressed included:

- Recordkeeping failures.
- Monitoring doesn't match permit.

- Late or incorrect reporting.
- Opacity issues.
- Changes without evaluation.
- Poor internal communication.
- Inspection readiness or lack thereof.

What inspectors are looking for was stated to include:

- Consistency.
- Transparency.
- Ability to explain compliance.
- Outstanding fees.

Minor issues that are noted to create major impressions include:

- Outdated site maps.
- Air emission sources not labeled.
- Conflicting equipment IDs.
- Not using the most recent permit version.

Things that good facilities do differently/focus on to avoid pitfalls include:

- Compliance systems.
- Internal audits.
- Cross-training.
- Inspection ready files.

Key takeaways were stated to include:

- Most violations are preventable.
- Documentation is critical.
- Administrative issues can drive enforcement.

A copy of the Presentation slides can be found here.