

EPA's Oversight of Synthetic Minor Sources: U.S. EPA Office of Inspector General Project Notification



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The United States Environmental Protection Agency ("EPA") Office of Inspector General ("OIG") issued an October 15th Project Notification addressing:

EPA's Oversight of Synthetic Minor Sources ("Project Notification")

See Project No. OA&E-FY19-0093.

The *Project Notification* originates from James I. Hatfield, who is Air Directorate for OIG's Office of Audit and Evaluation, and is transmitted to Anne Idsal, EPA Acting Assistant Administrator, Office of Air and Radiation and Susan Parker Bodine, EPA Assistant Administrator, Office of Enforcement and Compliance Assurance.

A "synthetic minor source" is generally described in the Clean Air Act context as one having a potential to emit that is at or above the major source emission threshold. However, the source accepts restrictions on emission rates, process controls, or other limitations in an air permit in order to stay below the major source emission thresholds.

The OIG *Project Notification* states:

Sources of air emissions that are potentially major sources are allowed to operate as minor sources when they agree to some sort of restriction (such as limiting their operating hours or installing control equipment) that reduces their actual emissions. Such facilities are labeled "synthetic" minor sources.

OIG states that the objective is to:

. . . determine whether oversight is sufficient within the EPA and state and local agencies to assure that synthetic minor sources of air emissions comply with the emission or operational limits in their air permits.

OIG will conduct work at EPA's Office of Air and Radiation at agency headquarters and Research Triangle Park, North Carolina along with the Office of Enforcement and Compliance Assurance at headquarters. Selected EPA regional offices and state and local agencies will also be potentially contacted "as needed."

EPA is asked to provide the following information:

- Identification of any investigations or legal proceedings that are in process that are significant to the audit objective.
- EPA policies, procedures and guidance related to synthetic minors and the EPA's oversight of synthetic minor sources.

- Access to any EPA database(s) to which EPA regions, state/local agencies, or individual facilities report required compliance information for synthetic minor sources.

A copy of the *Project Notification* can be downloaded [here](#).