

SNC Compliance Assistance

January 24, 2019

SNC NCI Conference

SNC Challenges

- SNC Non-Compliance Challenges
 - Low Income Areas
 - Financial Limitations from Permittees
 - Technical Knowledge/Experience Limitations from Permittees
 - Limited Certified Operators
 - Remote Areas
 - Limited Internet Coverage
 - Language Barriers

Compliance Assistance Solution

- Seminar “Tours”
 - NM: Three centralized locations around the state
 - In partnership with the state of NM
- Purpose: Hands-On Solutions
 - Training on DMR submittals
 - Discussion on BMPs
 - Brainstorming for other innovative solutions
- Results:
 - Over 60 attendees

Root Cause: Potential Solutions

- Lack of Certified Operators
 - Proposed Solution: Academia curriculum in partnership with industry and school
 - Industry pays tuition
 - Students stay with sponsored permittee for agreed upon time
- Lack of Finances to Support Infrastructure
 - Proposed Solution: Funding support from EPA/States
 - Grant money?
- High Operator Turnover Rate
 - Proposed Solution: Provide taped CA training (e.g. web link)
 - Include as part of a permit condition??

Next Steps

- Additional “Tours”
 - Make training sustainable (e.g. record the training)
- Follow up on innovative solutions
 - HQ resource support?
- On-going analysis on root-causes and proposed solutions