



# At a Glance

## Why We Did This Audit

We conducted this audit to determine whether the U.S. Environmental Protection Agency and state and local agencies provide sufficient oversight to assure that synthetic-minor sources of air emissions comply with the limits in their air permits.

Synthetic-minor sources are facilities that agree to restrictions in their permits to reduce their actual emissions below major-source thresholds to avoid being major sources of air pollution under Clean Air Act permitting programs. Major sources are the largest emitters of air pollution and are subject to stringent permitting and compliance requirements.

### This audit addresses the following:

- Improving air quality.

### This audit addresses a top EPA [management challenge](#):

- Overseeing states implementing EPA programs.

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## ***EPA Should Conduct More Oversight of Synthetic-Minor-Source Permitting to Assure Permits Adhere to EPA Guidance***

### What We Found

While the EPA oversees state and local compliance monitoring for synthetic-minor-source permits, the EPA conducts only limited oversight of the permits themselves. The EPA has issued guidance to state and local agencies to develop enforceable permit limitations in synthetic-minor-source permits, but the Agency does not review permits to assure the agencies meet this guidance.

**Without clear and enforceable limitations in synthetic-minor-source permits, facilities may emit excess pollution that would otherwise subject them to the more stringent requirements of the Clean Air Act major-source permitting programs.**

We reviewed 16 natural gas extraction industry synthetic-minor-source permits from Colorado and Oklahoma and found that many of the permit limitations did not adhere to the EPA's guidance. For example, in those permits, we found that 102 of 529 permit limits did not have sufficient information within the permit or the permit's supporting documentation to determine whether the limits were technically accurate. We also found that 26 limits did not specify the method for assessing compliance. In addition, 55 limits did not have sufficient monitoring requirements to determine whether the facility's assumed pollution reduction from pollution control devices was being achieved. This could result in a synthetic-minor facility emitting pollutants at or above major-source levels without being detected.

In addition, we found that the EPA had not communicated several key expectations for synthetic-minor-source permitting to state and local agencies via guidance. Further, Oklahoma does not allow the public to participate in its permitting process for certain synthetic-minor-source permits, as required by EPA regulations. EPA staff said this may be the case in other states as well.

### Recommendations and Planned Agency Corrective Actions

We recommend that the EPA (1) develop and implement an oversight plan for synthetic-minor-source permitting; (2) update its practical enforceability guidance; (3) assess EPA studies and other relevant information on enclosed combustion devices during its next review of applicable regulations to determine whether revisions to monitoring, record-keeping, and reporting requirements are needed; (4) develop and issue new guidance that includes key EPA expectations for synthetic-minor-source permitting; and (5) take steps to assure that all states adhere to public participation requirements for synthetic-minor permits. All recommendations are resolved with corrective actions pending.