

7.1.9 Schedule of Compliance

The compliance schedule should be sorted by regulatory issues as they are addressed in main text of the permit. Enforceable language should include specific due dates and conditions that request information “Within __ Days of” Time deadlines are always on the Permittee, not the Agency. Establish a timetable for all Permittee actions. Extension modifications can always be written in. Require submitted plans, proposals, etc. and make them subject to Agency approval. The only plans

the Agency does not formally approve are Health and Safety Plans. These may be required by the Agency but the Permittee approves their own plans and complies with the Occupational Safety and Health Administration (OSHA) requirements. The type of information required and how that information is collected and presented should also be described in the permit.

When establishing schedules of compliance with the Permittee, be realistic in timeframes established as conditions. If something needs notification immediately, define what is meant by “immediately”. A permit writer may establish a phone call within a certain number of hours after the event, with a follow up report in writing. Remember many facility operations run 7 days a week, 24 hours a day, and not just during Agency operating hours. Identify after hour contacts and indicate who receives notifications if the permit writer is not available.