



Technical Focus, Energy & Environmental Committee Meetings

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MINUTES

TUES-WED, JUNE 6-7

TECHNICAL FOCUS GROUP SESSION

Ajay Kasarabada, Black & Veatch Corporation, *Technical Committee Chairman*
Todd Young, HDR, *Technical Committee Co-Chairman*

Water Side Enhancements – Moderator, **Frederick (Fred) P. Fendt**, The Dow Chemical Company

Ann McIver, Citizens Thermal, presented on gaining an understanding of the plant water balance. There is an enormous amount of water on earth. However 96.5% of that water is in the oceans. Of the remaining, only 2.5% is surface water that is available for human use. Water use is ubiquitous. There are a number of uses for water in a plant including cooling (chilled water), heating (steam delivery), and control (temperature dilution, etc.). It is advisable to evaluate the water balance on the highest use day as well as the normal day. The first place to start is to know the source of the water. The sources range from rivers, lakes, and streams to wells and public water supply. At the Citizens steam plant, the maximum intake is 42 million gal/day, while the typical day would be 36 million gal/day.

Next is the uses of water. These could be equipment cooling, boiler water treatment, consumptive uses, and losses (evaporative, leaks, blowdown). It is important to understand how the water leaves the plant. Water leaves in the form of a product (steam to city, beer, etc.) and losses (discharge to sanitary sewer, discharge to source, leaks, etc.). Compliance with regulations includes consumptive use permitting and surface water intake reporting. There is also NPDES permitting, which requires the calculation of water quality based on effluent limits. Monthly reporting is required for NPDES. Finally the water balance can be used to help implement efficiency projects. Use permits come in to play in areas where water is scarce or when a drought is underway. Hidden opportunities include the consideration of sub processes. These might include condensation pathways, non-contact cooling loops, and alternative pathways.

Eric Hallman, Cargill Incorporated, reported on water efficiency. Water efficiency can be thought of as the minimization of water use for a particular task or result. This can also be considered as reducing wastage of water.

There is also a UN definition (doing more and better with less water). The concept is usually the volume use divided by the number or pounds of product. Besides the usual



considerations of water use (amounts, costs, etc.), there are risks going forward related to water use. Water scarcity is a major risk for major parts of the world. Water quality is another consideration. Water stress can be a driver for violence over access to water. Industrial users want to be efficient. That relates to both cost and reputation.

A water efficiency program starts with a facility wide audit of the water use at a facility. The plant water balance should be a "living document" in that it should be updated regularly. The plant water balance provides a means to benchmark to other similar industries and companies. Industry trends, case studies, and patterns can be identified. It is important to set goals and track data in order to work toward improvements. One of the keys is to measure water flow and use accurately. This includes both input and output data. The data should be tracked daily and captured in a data historian. On a monthly basis, the use vs. production can be calculated. This information can also help operators by providing instantaneous feedback on water use.

For boilers, inspection and maintenance helps to reduce leaks. Boiler tuning improves overall efficiency, including water use. Insulation maintenance reduces losses. Condensate return reduces water use. Blowdown levels and heat recovery can improve water use. Condensate pumps need maintenance. Flow meters on boiler make up and recirculation lines provide water use information as well as problem identification. The cooling system can be examined for additional use. This water can possibly be used twice. Wet scrubbers can be a second use as well as cooling towers.

Operators are key in understanding water use. Training and empowerment for operators is important to the success of any water program. A culture of water efficiency will help operators to operate within compliance and most efficiently. Real time data is needed to provide good information to the operators. Management is important to use the data to find areas in the plant that are susceptible to improve water efficiency. There are a number of online resources that are available to help get started.

Colleen Layman, HDR, reported on boiler water chemistry. Boilers need good quality water in order to operate reliably. There are multiple components for a successful water treatment program. Process and quality control are critical for the success of such programs.

The first step is to identify what has to be taken out of the water to make it acceptable to the boiler. The first element is sodium. Tied up with sulfates and chlorides, these elements lead to alkaline conditions and stress corrosion cracking. Chlorides also lead to pitting. Calcium and magnesium lead to deposits which limit heat transfer and plug tubes. Dissolved gases and organics can also cause issues. The removal of calcium and magnesium can be removed by a water softener. Ion exchange resins can absorb the calcium and magnesium (and other large cations) and replace them with sodium. A DE alkalization type exchanger can remove bicarbonates, carbonates, sulfates, nitrates. These are replaced in chlorides.

A reverse osmosis (R/O) system uses a semi permeable membrane to separate water (a small molecule) from the larger molecules. This system puts pressure on the salt side of the membrane and pushes the water through the membrane. The salt does not pass as it is too large. An R/O system does not need regeneration, but does produce a continuous waste stream.



Oxygen that is dissolved in the water causes corrosion. A deaerator is a mechanical device that contacts the water with steam to heat up the water and drive out the oxygen. Oxygen scavengers can be used to maintain the desired oxygen level. These processes are external water treatment processes that treat the water before the water gets into the boiler. Internal treatment involves the addition of chemicals that can remove a particular element. The most common treatment is an oxygen scavenger. Nonvolatile additives are sodium sulfite or an organic acid. These do not vaporize with the water. Volatile treatment was typically hydrazine. This compound breaks down and reacts with oxygen to make water and nitrogen. However, hydrazine is a carcinogen and there are other scavengers that are now coming into use.

Feed water pH control is used to maintain a somewhat basic pH level in the boiler. Acidic conditions will corrode the boiler. Acidic conditions can arise from CO₂ or other acidic contaminant has gotten into the boiler water. Neutralizing amines are common chemicals that can be used for pH control. The FDA has limits regarding neutralizing amines (other than ammonia) for steam that contacts foods. There are also filming amines. These form a very thin film on the pipe surface. This film protects the surface from corrosion.

The oldest treatment program is due to the fact that the phosphate ions exist in 3 separate forms. Phosphates also precipitate out calcium and magnesium in the form of a soft sludge that can be removed with boiler blowdown. There are also scale inhibitors. These can be used in low pressure boilers (less than 300 psi). All polymer programs are being used to replace phosphate treatment. These act as dispersants with weak sequestrants. They maintain the solubility of the calcium and magnesium. Care must be taken not to over feed these dispersants. They do produce very clean boiler surfaces and can actually reduce the amount of blowdown. Chelating agents can also be used to keep cations in solution. A common agent is EDTA. Control needs to be somewhat tighter for these agents. Monitoring and control is the real key to success.

The ASME publishes water chemistry limits for boilers. These are driven by pressure. The higher the pressure, the cleaner the water has to be. These standards are currently in the process of being updated. Sampling and monitoring points should include make up and return lines as well as the main line to the boiler. Sampling of the saturated steam is also recommended. Boiler blowdown also needs to be monitored for discharge conditions. Condensate returns are important to the economic value to the plant. Costs include water cost, sewer cost, fuel cost, chemical cost, pretreatment cost, and blowdown cost. These costs tend to range from \$10 – 25/ 1000 gal of condensate recovered. In some cases, the condensate has to be treated in order to return it to the boiler. These treatments range from condensate polishing to condensate filters and chemical injection. Reducing or controlling the blowdown levels can also save money. These are in the same range as the condensate return. Good control can even out the chemistry swings in the boiler. This starts with good quality make up water. The better the quality of the makeup water, the less blowdown is required. The goal is to minimize the contaminants entering the system. Then the internal treatment system needs to be assessed with the actual requirements for the plant. Monitoring and control is key to the overall success of the program.



Frederick (Fred) P. Fendt, The Dow Chemical Company, summed up by pointing out that water is an integral part of our facilities and that more scrutiny is being applied to water use issues, not only by regulators but by our customers and the public as well as the investment community.

GOVERNMENT AFFAIRS SESSION

Anthony Reed, Archer Daniels Midland Co., *Government Affairs Committee Chairman*

The last Quarterly Meeting in March showed a little bit of cautious optimism on tax reform and manufacturing. In the interim, there have been a number of distractions which have led to a slower progress on important items.

The slow pace of nominations and confirmations continues. Taxes, healthcare, and infrastructure will need these spots filled to actually make progress. There are nearly 500 positions that need to be filled. There has been a lot of distractions such as the FBI director and the Paris Accords. However, there has to be nominees for Congress to vote on. A full process of vetting and hearings takes substantial amounts of time. The budget and debt ceiling will take most of Congressional time after the July 4th recess.

The President's proposed budget sets a tone, but will be changed by Congress. Hearings have already started and cabinet heads will have to testify as to what is really included. Bills have been passed in the House, but only one bill has gone to the Senate (S. 951). This Regulatory Accountability Act has been approved by the Government Affairs and Homeland Security committees by one vote. This was the mildest of the bills.

EPA has started to move on some actions. Some regulations have been pulled back. There have been compliance stays, pending regulatory actions, and guidance issues.

Mid-term election season is already upon us. There are only 17 months to the mid-term elections. With all of the distractions that are in play, there is no incentive for the two parties to cooperate. The agencies will then place where things will get done. Congress is split along party lines. People have actually moved to regions that are in line with their party affiliation. That means that the House is actually fairly representative of the people that voted for them.

ENERGY SESSION

Frederick (Fred) P. Fendt, The Dow Chemical Company, *Energy Committee Chairman*
Robin Mills Ridgway, Purdue University, *Energy Committee Vice-Chairman*

Janet Gellici of the National Coal Council reported on opportunities for coal in the new administration. The NCC is an advisory group to the Department of Energy. It reports directly to the Secretary of Energy. Generally, the Secretary will request information or a position on a particular topic and the Council will gather the information and prepare a report. With the new administration, things are still in a state of flux.

However, there are 3 general positions that can be put forth. These are that the administration is pro development (growth), pro market, and pro America. Regulatory reform actions have been taken and are continuing.



The administration intends to open up more federal lands to the energy industry. The coal leasing moratorium has been lifted. The coal industry would like to see the existing coal fleet preserved and enhanced (stop the bleeding).

There is value to a diversified portfolio of energy sources (i.e. coal, oil, gas, nuclear, hydro, etc.). The coal industry would like to see some new markets for coal in the form of new products (chemicals, fertilizers, fuels, CO2 utilization, EOR, etc.). An additional wish would be for new coal fired plants (with new technology, etc.). The lack of appointees will likely hold up some of the actions on these types of plants. The “social cost of carbon” is under review.

At the present time, there does not appear to be any action to challenge the “endangerment finding” (Mass vs EPA). New Source Review is being reviewed. The NCC has asked for review on this subject in nearly every report that they have issued. The Council has also requested review of the effluent standards and the coal combustion residuals. They have also requested “policy parity” for coal relative to the incentives given to the renewables industry. A report was issued towards the end of 2015 concerning some specific types of incentives for coal (\$50/ton credit for CO2 sequestered, MLPs, base load power, etc.). The pro America initiatives center on things like energy security, self-sufficiency, and economic competitiveness. This includes exports of energy products (coal exports, LNG, and oil). Improved ports, LNG terminals, EOR, and technology are all activities that should be promoted. Privatization of some of these activities could be one approach to get these moved forward.

Capacity market issues are being considered by the FERC. Most of what has been done so far has been done by executive order with the goal of undoing the executive orders promoted by President Obama. What is needed is some sound legislation to codify some of the positions that have been put forth. The administration is looking for “wins” right now. They are driven by metrics (number of jobs, increased production, etc.). Even small improvements are appreciated.

Frederick (Fred) P. Fendt, The Dow Chemical Company, noted that a number of infrastructure initiatives were started in support of the CPP on the start of a program to trade efficiency improvements. The National Efficiency Screening Project has issued a national standard practice manual for Energy Efficiency Cost Effectiveness. This group is part of the ACEEE. The idea is to help with the estimate of the cost effectiveness. The overview indicates that over 75 organizations are members. The group is utility oriented. The California Standard Practice Manual has been the prevailing guidance on cost effectiveness. California does not represent a real world view of the industrial sector. This may be something that we would want to comment on.

The US Department of Energy is looking at revitalizing some of the tools that were developed in the past. One of the new tools that DOE has developed can help with ISO 50001 certification. For those that have plants in the EU, ISO certification is a requirement. DOE and ASME are also reviewing some of the standards that we worked on during the Bush Administration.



ENVIRONMENTAL COMMITTEE SESSION

Chuck Hallier, Cargill Incorporated, *Environmental Committee Chairman*

Robert (Rob) Kaufmann, Koch Companies Public Sector, LLC, *Environmental Committee, Vice-Chairman*

George Faison of the US EPA provided an update on Non Hazardous Secondary Materials (NHSM) as part of the Boiler MACT rules. The NHSM rule clarifies which secondary materials can be treated as fuels and which materials are considered wastes and subject to the incinerator rules (CISWI). The key determinants are as follows:

- Has the material been discarded
- Has the material be processed into a fuel product that meets the legitimacy criteria

Traditional fuels do not have to be clarified. EPA has prepared clarification letters in response to case by case requests. Materials such as poultry litter, paper fluff, MSW, and bio solids have gotten letters. It was hoped that the rule would be self-supporting, but materials come up all the time. In 2016, there were some materials that were deemed to be “categorical non-waste fuels”. Pulp and paper sludge, construction and demo wood, treated railroad ties, and some bio materials have been declared to be fuels and not wastes. Some requests and executive orders to address the impact of Federal Regulations on domestic manufacturing, reducing regulations and controlling regulatory costs, and the regulatory reform agenda. A number of public meetings have been held and comments have been requested. About 375,000 comments have been received. The budget cycle is also a major consideration.

Relative to NHSM, only a small number of comments were received. Processed MSW is being considered. Gasification and pyrolysis process are also being looked at. States have the responsibility to implement the rules.

Amy Marshall, AECOM gave an update on the CPP and NAAQS rules. The 2013 Obama Climate Action Plan required EPA to issue GHG standards for new power plants (NSPS) and existing plants (CPP). The plan focused on EGUs as the largest contributor to GHGs. The transportation sector was second.

With the new administration, an executive order was issued to review the CPP and associated rules along with the social cost of carbon. The NEPA guidance was withdrawn. The oil and gas sector methane ICR was withdrawn.

The methane NSPS is under reconsideration and partial stay. The landfill NSPS was delayed. The president announced the withdrawal from the Paris Accord. The actual process will take some time.

The president pledged to work with Democrats to renegotiate US involvement on “terms that were fairer to the US”. In a consent decree, EPA agreed to issue revised NAAQS rules on NOx



and SO₂. The ozone NAAQS were lowered to 70 ppb from 75 ppb in 2015. The litigation is on hold pending EPA review. Due to improved air quality, the 70 ppb standard may not be as difficult to meet, but again, there is a 5 year review schedule that will have to be observed. California and the I-95 corridor are the major areas. EPA has to designate on attainment areas based on the 70 ppb standard this year. Interstate transport is still a consideration. CIBO submitted comments on this subject. For the 2010 SO₂ 1 hour standard, the EPA designated 29 areas as non-attainment. In a second round an additional 61 designations were made of which 4 were non-attainment. PM 2.5 designations have also been made. Relative to the modeling activity, Appendix W modeling guidelines went final on May 22. Clearinghouse approval is also required for non-standard techniques. Evaluation of single source secondary PM_{2.5} and ozone impacts have a 2 tiered approach. In some cases, the tier 2 requirement would include additional chemical impacts.

Robert (Rob) Kaufmann, Koch Companies Public Sector, LLC, reported on regulatory reform initiatives. The president has issued a memo and two executive orders that are aimed at streamlining the permitting and regulatory burdens on domestic industry. In addition, the OMB has required that the unified agenda that is published twice per year must include deregulatory rules as well as regulatory. A new rule that must also show that two rules have been eliminated. If a proposed rule is not in the agenda, it will not be approved.

Under another review, the social cost of carbon will be subject to OMB guidelines for discount rates. The OMB recommends a 7% discount rate, while the social cost of carbon relied on a 3% discount rate to come up with a number in the \$30 – 40/ton. EPA has been directed to review the WOTUS rule. EPA is reconsidering the Risk Management Plan. EPA is reconsidering the CAFÉ standards for the 2022-2025 model years. EPA is reconsidering the Oil and Gas Sector Methane rules. Justice has successfully petitioned the courts to halt litigation on a number of rules including CPP, ozone NAAQS, effluent guidelines, utility MATS, SSM rules, and several others.

The Congressional Review Act only passed one rescission. The rest of the rules have been treated by executive order. The proposed EPA budget was cut by over 25%. Cuts impacted the state and tribal assistance, GHG reporting, Air research, environmental justice, geographic water programs, and air programs. Reform priorities from the comments include permit streamlining, NAAQS implementation, reduced cost of air rules, rescind CPP, fix social cost of carbon, address mobile source standards, rescind WOTUS, limit EPA nutrient rules, rescind effluent guidelines, rescind RMP rules, and cost effective TSCA rules.

Scott Darling, Alcoa Corp., reported on the Midwest Ozone Group (MOG) activity. The northeast states petitioned to include a number of target states in the Midwest in required ozone reductions on the grounds of ozone transport. In January, EPA proposed denial. The CAA does not require the administrator to include these states. There are other programs that are reducing emissions. Air quality is improving. The northeast states tried to create a new contribution standard that was different from EPA standards. PA has done a RACT standard and CT has done a RACT standard already. The OTC has also proposed measures. The Fairfield, CT monitor has traditionally been a problem. The contribution to that monitor from the Midwest is low compared to the rest of the sources, including motor vehicles. Finally, international emissions are contributing to the problem. Some 16 – 19 ppb out of 74 ppb are coming from Canada and Mexico.



The KY FIP case was held in the Federal District Court of Northern California. The EPA wanted extra time. The court sided with the Sierra Club and denied extra time.

Gary Merritt, Inter-Power/AhlCon Partners, L.P., reported on the RCRA rule and the CCR Comments. There are over 30 rules under review. The Water Infrastructure Improvement for the Nation Act (WIIN) provided EPA with the ability to approve or disapprove a state program regarding coal ash. This upsets the coal combustion residue rule (CCR), which was under subtitle D and was a state program. In the meantime, USWAG submitted comments on the CCR rule. The rule was supposed to be designed to eliminate citizen suits, but with an EPA approval required, this comes into question. USWAG comments requesting reconsideration on some key issues. These include risk based ground water protection, corrective action remedy, allowance for alternative compliance, clarification on closure in place, confirming beneficial use, correction to the definition of beneficial use, state improved liner system, and aquifer location restrictions. With all of these activities, it could be some time before these issues are all ironed out.

Lisa Jaeger, Bracewell LLP, reported on of the litigation and reconsideration of the Boiler MACT suite of rules. There are also 5 MATS cases that are being followed because they are also MACT rules and are similar to the Industrial Boiler MACT cases. The BMACT case on reconsideration has had briefing completed. The other BMACT cases are being held in abeyance due the administration review of the rules. The court remanded 4 issues and 20 standards to EPA.

There is certification petition to the Supreme Court. The question is whether or not EPA can lawfully issue emission standards that require impossible perfect performance and outlaw accidental releases. The arguments include that 112 (r) covers malfunctions, emissions are de minimis, and no standards are available. EPA opposed cert arguing that 112(r) is not applicable, de minimis was not raised, and that the citizens' suit threat was over stated. A reply is due. The case could go to the Court in the middle of June at the earliest.

EPA noted that CIBO did not join the suit. The problem with this petition is that the 112 (r) section does not really apply. Our position has been that work practice standards would resolve the issues. On the 130 ppm standard, the environmental petitioners claim that the level is not maximum reduction achievable. They also went back over the ground that CO is not a good surrogate. A prior court decision upheld CO as a surrogate. Work practice standards have been proposed for startup and shut down. The court remanded a number of issues back to EPA for better justification.

On the emissions standards, a number of standards were calculated based on 90% solid fuel, but the rule defines a solid fuel unit as one burning 10% solid fuel. For mercury, 2 out 3 standards get more stringent. The worst is liquid fuel where the standard would be reduced by 63%/ The HCl standard could go down by 30% on solid fuel and 68% on liquid fuel.

For biomass, the PM standards could be impacted on 6 of the 12 categories, the worst being an 85% reduction for a biomass fluid bed.

For the CO standards, 3 of the 15 standards become more stringent, including 55% on biomass fluid beds and 50% on wet biomass stokers. It will likely be a year before the numbers come



out. Then there will be a new round of comments, etc. Finally, there will be a new time frame for compliance.

On affirmative defense, there is still activity. With the administrative review, EPA has requested the case be put in abeyance while they review the rule. Work practice standards for Start-up/Shut-down (SU/SD) is in the recon case. The risk and technology review (RTR) requires a review of MACT standards every 8 years. The deadline was missed on 20 of these, including the stationary gas turbine MACT. The court has ordered EPA to complete these RTRs by 2020.

The utility MATS cases are still messy. There are 5 cases, of which 4 are in abeyance. The other case involved the requirement for EPA to consider jobs. The court agreed. EPA has appealed to the 4th Circuit Court. The other cases await the decision on the Boiler MACT Reconsideration case (SU/SD, definition of coal refuse, affirmative defense, work practices, etc.).

Relative to the MATS supplemental finding case, the Supreme Court remanded the rule to EPA to include cost. EPA put their cost justification back out. However, they have asked for the case to be held in abeyance pending EPA review. The MATS recon rule was also put in abeyance for EPA review. There is also a PA MATS Title V issue.

Under the title V, waste coal plants could get a 3 year extension to cover requirements. PA was challenged and EPA agreed to review.

On the Clean Power Plan, the rule was stayed by the Supreme Court. The DC Circuit Court agreed to hear the case with the full panel (en banc). With the change in administration, the EPA pulled the CPP. EPA asked the court to hold the case in abeyance for 60 days. The court granted abeyance. The court also asked the parties to comment on whether the case should be remanded rather than held in abeyance.

On the NAAQS, the 2008 implementation and the 70 ppb standard are under review. The 70 ppb standard has been delayed for one year. There is a bipartisan ozone compliance bill that would allow states and EPA to coordinate in order to avoid a non-attainment designation.

The CSAPR Update rule for 2008 is set for briefing. Wisconsin claimed the EPA failed to account for ozone originating outside of the US. Wisconsin also claimed that EPA's methodology was arbitrary, capricious, and unlawful. This case will likely take until 2018 for a result.

In another CAA case, the EPA used a section of the rule that did not apply to GHGs in an effort to regulate GHGs, namely refrigerants. Industry claims EPA has no authority to regulate non-EDS substitutes for GHG emissions. EPA has asked for an abeyance.

On the Regional Haze Rule, Texas challenged the requirements of the second plan period. Nearly everybody is in the suit. There many claims on both sides. Briefing begins in July.

The Regional Consistency rule was proposed to allow EPA to be "inconsistent" in certain instances relative to its proposed rules. They have been challenged. The rule is under review.



The significant emissions rate for GHGs is under review. The current number is 75,000 ton/yr. The risk management rule was challenged. The case is in abeyance. EPA has proposed to delay the implementation to 2019. Oral argument is scheduled for the 316 (b) rule. Oral argument was scheduled for September.

The EGU Effluent Guideline was challenged. A petition for reconsideration was granted. The case has been halted for another review.

The Waters of the US rule cases were consolidated at the circuit court level, but not at the district court level. The executive order required EPA to pull the rule and properly define navigable waters as permanent bodies of water per Justice Scalia. The Supreme Court will likely decide which court gets jurisdiction. The case will not be decided until at least next year.

On the coal ash rule, briefing is complete, but oral argument is not scheduled. There is a petition for rulemaking for MSW ash.

The rule definition of solid waste relative to legitimacy factors for materials that are not discarded presumes that the material is a waste. A "verified recycler exclusion" has to demonstrate that it is truly recycling as opposed to discarding. The Hazardous Waste Generator Improvements rule was supposed to make the rules more "user friendly". Industry did not agree. The case was just put in abeyance.

There have been a number of actions on energy and fossil fuels. The Congressional Review Act has repealed the SEC oil and mining extraction reporting and the DOI stream protection rule. EPA withdrew the methane and VOC NSPS ICR. EPA has to review the methane NSPS. The Dept. of Interior suspended the rule on mining on federal and Indian lands. The Council on Environmental Quality (CEQ) rescinded the NEPA guidance on GHG emissions. The only difference is working groups on the social cost of carbon were disbanded.

The moratorium on coal leases on Indian lands was rescinded. The 2 for 1 rule is being challenged in court. The argument is that the order only considers costs and not benefits. Another executive order requires the expediting of environmental reviews and approvals for high priority infrastructure projects.

The Fixing America's Surface Transportation (FAST) Act has a title 41 that provided for streamlined permit activity for infrastructure. Under this act, permit agencies have compelling time lines. The permit can only be challenged within 2 years rather than 6 years. If the timetable is not agreed within 60 days, the OMB will decide. There are some fees, but not until the regulations are implemented. There is some consideration that some of the ideas might find their way into the general case for permits.

Justice Gorsuch is now on the Supreme Court. Susan Bodine has been nominated for EPA's Office of Enforcement and Compliance Assistance (OECA). Hopefully, the emphasis will focus on compliance rather than enforcement.