



At a Glance

Why We Did This Review

The objective of this evaluation was to determine to what extent the U.S. Environmental Protection Agency's (EPA's) enforcement actions led to sustained compliance under the National Petroleum Refinery Initiative (NPRI, or the initiative). The EPA selected the petroleum refinery sector as one of its National Enforcement Initiatives (NEIs) in 1996. The EPA intended that its NPRI strategy's companywide consent decrees, or legally binding agreements, would lead to improved compliance and reduced harmful air pollutants or emissions as companies changed environmental management practices and reduced their emissions. The EPA officially concluded the NPRI in 2007, when 80 percent of the refining facilities were under a consent decree.

This report addresses the following EPA theme:

- *Addressing climate change and improving air quality.*

For further information, contact our public affairs office at (202) 566-2391.

The full report is at:
www.epa.gov/oig/reports/2014/20140415-14-P-0184.pdf

EPA Needs to Demonstrate Whether It Has Achieved the Goals It Set Under the National Petroleum Refinery Initiative

What We Found

Under the NPRI, the EPA planned to increase compliance and reduce emissions within the petroleum refinery industry. However, the EPA did not determine whether the NPRI achieved the compliance goal it set. In 2006, the EPA assessed whether companies under consent decree were making progress toward the established emission-reduction goal it set. However, since that time, the EPA has not analyzed the available facility data to determine whether the initiative achieved the established emissions-reduction goal. Work on the NPRI has declined since 2007, as the EPA has reduced resources dedicated to the initiative. The EPA did not place the same attention on monitoring initiative outcomes as it did on negotiating consent decrees.

By determining the outcomes of the NPRI, the EPA can strengthen the likelihood of success for future initiatives and sustain the desired benefits.

The EPA has replicated this enforcement model in other NEI sectors, such as the stormwater initiative. The EPA needs to know whether this enforcement approach produced the intended outcomes. By making this determination, the EPA can strengthen the likelihood of success for future initiatives, and achieve and sustain the desired reductions in risk to human health and the environment.

Recommendations and Planned Corrective Actions

We recommend that the EPA's Assistant Administrator for Enforcement and Compliance Assurance develop and implement a plan to assess whether the NPRI led to sustained improvement in compliance and sustained reductions in pollution among refineries. We also recommend that the EPA report the results of its efforts to the public.

The EPA agreed with our recommendations. The EPA responded that the agency planned to post company-reported emission data to the public website as consent decrees are completed. The EPA agreed to guide future NEIs to include periodic evaluation. We agreed with the EPA's proposed corrective actions. Three recommendations are resolved with corrective actions underway and one recommendation is closed with corrective actions completed.

Noteworthy Achievements

The NPRI achieved broad industry coverage by addressing compliance problems on a companywide basis as opposed to a facility-by-facility approach. The companywide strategy used a proactive approach to solving compliance problems by focusing on technology-based solutions to prevent noncompliance.