

**U.S. Environmental Protection Agency
State Review Framework: Round 1 (Fiscal Years 2003 – 2007)
Recommendation Status**

Florida Department of Environmental Protection (FDEP)

22 Recommendations

Clean Air Act Recommendations

Recommendation Title: FDEP should develop and implement a plan that ensures all elements of a CMR and FCE are consistently completed and documented.

Element: E2 Violations ID'ed Appropriately

Finding: Our review of the 36 source files showed six files with one or more of the FCE or CMR elements missing. One file was lacking documentation of all elements.

Status: Completed

Expected Completion Date: 01/31/2008

Responsible Agency: State Action

Recommendation Narrative: FDEP should develop and implement a plan that ensures all elements of a CMR and FCE are consistently completed and documented in the source files and that credit for a FCE not be shown in AFS until completion of all elements can be documented. Routine implementation of the existing FCE checklist is a way to ensure element documentation and should be part of this plan.

Recommendation Title: Include inspection reports in every file.

Element: E3 Violations ID'ed Timely

Finding: Thirty-two of the 36 files reviewed had an inspection report though three were undated.

Status: Completed

Expected Completion Date: 01/31/2008

Responsible Agency: State Action

Recommendation Narrative: To ensure the integrity of reported FCEs and the timeliness of HPV identification, FDEP should examine why inspection reports are not in every file (it is acceptable to maintain an electronic inspection report in ARMS) and why some inspection reports in the files are not dated.

Recommendation Title: FDEP should examine their HPV resolution practices and develop and implement a plan that will ensure conformance with the enforcement action time lines of the HPV policy.

Element: E6 Timely & Appropriate Actions

Finding: 54 HPVs (31.5%) went unaddressed beyond 270 days. This statistic was supported by the file review.

Status: Completed

Expected Completion Date: 12/31/2007

Responsible Agency: State Action

Recommendation Narrative: FDEP should examine their HPV resolution practices and develop and implement a plan that will ensure conformance with the enforcement action time lines of the HPV policy.

Recommendation Title: FDEP needs to ensure that their penalty calculation worksheet includes an economic benefit component in the calculation.

Element: E8 Penalties Collected

Finding: For the eight penalties where economic benefit was not addressed, it could not be determined by examining the worksheet whether this component was found not to apply or whether it was not considered.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: FDEP needs to ensure that their penalty calculation worksheet includes an economic benefit component in the calculation.

Recommendation Title: FDEP should document and share with the Region their present understanding on how HPV resolution is to be coded in AFS and what steps they are or have put into place to ensure this understanding.

Element: E11 Data Accurate

Finding: The data metrics show 36 of 42 HPVs being carried in AFS as in compliance when in fact these 36 HPVs have not been resolved and thus should be depicted in AFS as in non compliance.

Status: Completed

Expected Completion Date: 12/31/2007

Responsible Agency: State Action

Recommendation Narrative: FDEP should document and share with the Region their present understanding on how HPV resolution is to be coded in AFS and what steps they are or have put into place to ensure this understanding.

Clean Water Act Recommendations

Recommendation Title: FDEP should input all inspections into PCS per the CWA §106 workplan requirements. Current data entry process should be evaluated for possible improvements to ensure timely data entry of inspections.

Element: E1 Insp Universe

Finding: As part of FDEP's CWA §106 workplan commitment, Florida is to develop an inspection plan annually that covers inspections at conventional, storm water, and CAFO facilities. The inspection plan was determined to be consistent with EPA guidance.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: FDEP should input all inspections into PCS per the CWA §106 workplan requirements. Current data entry process should be evaluated for possible improvements to ensure timely data entry of inspections.

Recommendation Title: Inspection reports receiving noncompliance ratings should all be accompanied with documentation that additional review was performed and that the review supports a SNC determination.

Element: E2 Violations ID'ed Appropriately

Finding: The files reviewed did not contain documentation that SNC review was performed, when applicable. The quality of inspection reports varied from well documented inspection findings with supporting photographic evidence to very brief with little to no description. Specific areas observed, condition of the facility, specific records reviewed, etc. could not clearly be determined if the inspection report cover sheet was not accompanied with a detailed narrative and/or photos

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: Inspection reports receiving noncompliance ratings, necessitating further review of the SNC criteria, should all be accompanied with documentation that such additional review was performed and that the review supports a SNC determination.

Recommendation Title: FDEP should include guidance on inspection report content and issuance time frame in its next revision of the EMS.

Element: E3 Violations ID'ed Timely

Finding: Eighty-five per cent (39 out of 46 inspection reports reviewed) of inspections reports reviewed were completed and delivered/forwarded to the permittee in a timely manner, within 30 days from the date of the inspection. Timely issuance of one inspection report could not be determined due to the final signed and dated CEI cover letter not found.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: The FDEP should consider including guidance on inspection report content and issuance time frame in its next revision of the EMS. This would help ensure that inspection findings are well documented with appropriate supporting material referenced as well as the timely issuance of the inspection reports.

Recommendation Title: Florida should review and update its EMS and submit the EMS to EPA in accordance with the CWA §106 workplan.

Element: E4 SNC Accuracy

Finding: The current EMS does not address changes in the rules/regulations such as those dealing with storm water, MS4, and concentrated animal feeding operation, and changes in SNC definitions.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: Florida should review and update its EMS and submit the EMS to EPA in accordance with the CWA §106 workplan. The enforcement escalation

requirement, in addition to the circumstances mentioned in the EMS, should allow for facilities that would become SNC or are in SNC to be fast tracked to a formal enforcement action instead of the current process where WL is issued followed then by formal enforcement action consideration.

Recommendation Title: Florida should evaluate its enforcement response policies.

Element: E6 Timely & Appropriate Actions

Finding: Florida is above the 2% threshold, set by national guidance, for SNC facilities that are beyond required enforcement timeliness milestones, reported at 6%, but is below the national average of 8.6%. Forty-three per cent (three out of seven) of the enforcement actions at major facilities reviewed were determined not to be issued timely (beyond 180 days from the date the facility was determined to be out of compliance). A total of 24 enforcement actions were reviewed (eleven informal and 13 formal enforcement actions). Two storm water files reviewed demonstrated FDEP did not respond timely to violations discovered.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: Florida should evaluate its enforcement response policies to determine ways to ensure that the state enforcement action response is timely, striving to maintain the less than two percent national goal for major facilities without timely action. The ERG/EMS should be amended to incorporate processes that address identified areas of improvement. Florida should better utilize their county partners' inspection resources in targeting unpermitted facilities for enforcement and/or compliance assistance. County inspection reports submitted to FDEP should all be reviewed and inspection findings evaluated in order to more timely address violations.

Recommendation Title: All supporting documentation demonstrating penalty derivation, specifically addressing gravity and economic benefit, should be retained and made available for review by EPA.

Element: E7 Penalty Calculations, E8 Penalties Collected

Finding: The storm water program utilizes a penalty guideline for characterizing NPDES violations. A penalty assessment matrix is used which considers degree of violation and potential for harm. Adjustment factors that may increase or decrease the penalty amount include: Good or bad faith efforts, History of noncompliance, Economic benefit of noncompliance, Ability to pay, Merits of the case and Resource consideration. Although included as one of the adjustment factors, consideration of economic benefit as a component of the penalty assessment for storm water was not clear and could not be determined during the file review.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: An assessment of economic benefit or potential economic benefit derived should always be performed and documented. Every reasonable effort must be made to calculate and recover economic benefit and gravity. If such assessment is not feasible or is not applicable, a notation in the file should be made with an

explanation. If exceptions to the calculated penalties are made, then a detailed explanation should follow documenting the cause for such deviations (e.g. waiving penalties, inability to pay evaluation, etc.). All supporting documentation demonstrating penalty derivation, specifically addressing gravity and economic benefit, should be retained and made available for review by EPA.

Recommendation Title: FDEP should ensure that all negotiated grant workplan commitments are met.

Element: E9 Grant Commitments

Finding: The FDEP met or exceeded most requirements of their NPDES compliance and enforcement FY2006 CWA §106 workplan with the exception of data management requirements. No storm water enforcement information has been entered into PCS (see Element 8). It is noted that all storm water formal and informal actions and penalty only actions are submitted quarterly to EPA, but are not identified in PCS.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: FDEP should ensure that all negotiated grant workplan commitments are met.

Recommendation Title: Florida should enter all required minimum data in PCS per the negotiated CWA Section 106 workplan reporting schedule.

Element: E10 Data Timely

Finding: Additional minimum data requiring PCS data entry per the CWA §106 workplan reporting schedule include all formal and informal enforcement actions to be entered within 30 days of issuance, assessed and collected penalty amounts to be entered within 30 days of issuance, and inspection data to be entered within 15 days of completion of inspection report, but no later than 90 days from the date of the inspection. The file review discovered that penalty information, formal and informal enforcement actions and inspection documentation were found to be in the facility file but not entered into PCS consistently (see Element 9).

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: Florida should enter all required minimum data in PCS in a timely manner for inspections, enforcement action, permit limits, penalty information and/or DMR data per the negotiated CWA Section 106 workplan reporting schedule.

Recommendation Title: FDEP should strive to achieve the national goal of 95% for data quality with respect to DMR and parameter measurement coding into PCS.

Element: E11 Data Accurate

Finding: The SRF data metrics noted major facilities having correctly coded limits (current) for Florida is at par with the national average of 91%, yet still below the national goal of at or above 95%. The data metric findings were supported by the file review process. The file review discovered several informal and formal enforcement actions as well as numerous inspection reports (including two MS4 audits) were not

entered into PCS (see Elements nine and ten). This is both a data accuracy and completeness concern. No storm water enforcement information has been entered into PCS (see Element 8). It is noted that all storm water formal and informal actions and penalty only actions are submitted quarterly to EPA, but no data is available in PCS.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: FDEP should strive to achieve the national goal of 95% for data quality with respect to DMR and parameter measurement coding into PCS. Data entry procedures should be developed that account for regular QA/QC of data entered into PCS. Florida should re-evaluate and revise, as necessary, current protocols to ensure limits are coded correctly. Pending results of the review, FDEP should develop a plan/schedule to implement actions to improve the timeliness of data entry limits for majors.

Recommendation Title: FDEP should institute procedures that assure that all information that should be entered into PCS is routed to data entry staff.

Element: E12 Data Complete

Finding: During the file review, nine informal and seven formal enforcement actions were found to be in the facility file but not accounted for in PCS; ten inspection reports (including two MS4 audits) were found not to be entered into PCS; no storm water enforcement was found in PCS; and no SEVs were reported in PCS. Although FDEP was able to maintain a DMR and parameter entry rate for majors at an impressive 98.9% (the data entry rate for majors is based on the universe of those majors with limits coded in PCS. The SRF data metrics noted major facilities having correctly coded limits (current) for Florida is at par with the national average of 91%), data completeness is a concern. For FY2006, PCS reported 13 formal actions; however, the State provided data stated 30 waste water formal actions were issued in FY2006. Total penalties reported in PCS for FY2006 was \$0, however, FDEP provided information of \$168,838. These discrepancies in data indicate that not all required data is being reported and/or accurately reported into PCS.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: FDEP should institute procedures that assure that all information that should be entered into PCS is routed to data entry staff. Periodic data pulls should be performed from the state database and PCS for all minimum data required, and reconcile any differences found.

Resource Conservation and Recovery Act Recommendations

Recommendation Title: Determine cause of data discrepancies and correct.

Element: E1 Insp Universe

Finding: The OECA FY2006 National Program Manger's (NPM) Guidance specifies that 20% of the active LQG universe should be inspected every year, with a goal of

achieving 100% inspection coverage every five years. The OECA SRF Data metrics indicate that in FY2006 FDEP inspected 31.1% of the active LQG universe, which exceeds the one-year OECA NPM Guidance LQG inspection requirement. During FY2002-FY2006, the metrics indicate that FDEP inspected 70% of the LQG universe, which is below the requirement of 100% inspection coverage over five-years.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: There is a probability that data discrepancies in the active LQG universe resulted in the missed requirement of 100% LQG inspection coverage over five years (FDEP data metrics provided by OECA show 70% inspection coverage). Discussions with FDEP indicate data translation problems may exist between RCRAInfo and the state database in the active/inactive LQG field. The OECA data metrics (based on RCRAInfo) show 440 active LQGs, while FDEP reports 359 LQGs in the state database. FDEP is analyzing the LQG universe used in the OECA data metrics to correct the translation problem. Once the LQG universe is corrected, the data metrics can be recalculated to reflect the accurate five-year LQG inspection coverage. In addition, Florida should continue to work with EPA Region 4 during the development of the fiscal year grant workplan to ensure OECA guidance requirements are included in the grant commitments. If it is determined that the shortfall is not due solely to a data translation problem, the Region will work with the State to more closely monitor the number of LQG inspections occurring on a yearly basis.

Recommendation Title: Implement an internal alert mechanism to identify when inspection reports are approaching 50-day time limit.

Element: E3 Violations ID'ed Timely

Finding: Of the FDEP files reviewed, the inspection reports were completed within the following time frames: 63 % were completed within 50 days from the date of the inspection; 14 % were completed between 51 and 100 days from the date of the inspection; 23 % were completed greater than 100 days from the date of the inspection. There did not appear to be a consistent explanation for the inspection reports that exceeded 50 days (i.e., sampling required, more information requested, etc.) or a pattern of late reports with any particular district office. Some of the late reports involved SNCs facilities, while others were RCRA Secondary Violators or did not have any violations identified.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: It is recommended that FDEP establish and implement an internal alert mechanism to identify when inspection reports are approaching 50-day time limit.

Recommendation Title: FDEP should have an internal process to ensure that SNC facilities are identified and entered into RCRAInfo.

Element: E4 SNC Accuracy

Finding: In the review of the enforcement files, there were five cases that had final enforcement actions but were not flagged in the FDEP Hazardous Waste Compliance and Enforcement Tracking (CHAZ) database as SNCs (RCRAInfo translation problems were ongoing during the time of the file review, so CHAZ data was reviewed instead).

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: It is recommended that FDEP establish and implement an internal process to ensure that SNC facilities are properly identified and entered into RCRAInfo.

Recommendation Title: FDEP should document the consideration of the economic benefit of noncompliance in each enforcement action.

Element: E7 Penalty Calculations

Finding: Of the twenty enforcement files reviewed, FDEP had calculated and documented a penalty in eight cases (40%) that addressed both the gravity component and economic benefit, where appropriate. An additional eleven cases (55%) had penalty calculations that contained a gravity component, but did not include economic benefit calculations. One case did not have any penalty calculation documentation in the file, although the penalty was recorded in RCRAInfo. FDEP asserted that they consider the economic benefit from noncompliance in each penalty calculation. However the consideration was not always stated in the penalty documentation.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: FDEP should document the consideration of the economic benefit of noncompliance in each enforcement action. The documentation should take place even in cases where no economic benefit was realized by the facility.

Recommendation Title: It is recommended that the grant workplan be updated annually to reflect any changes in guidance/policy for that fiscal year.

Element: E9 Grant Commitments

Finding: 69% of the Comprehensive Groundwater Monitoring Evaluations (CMEs) and groundwater Operation and Maintenance (OAM) inspections were completed and 87% of planned inspections at LDFs were completed. The End-of-Year report did not refer to the specific reason for the shortfall. In FY2006, there was no specific OECA NPM Guidance requirement for the frequency of CMEs/OAMs at LDFs.

Status: Completed

Expected Completion Date: 01/28/2008

Responsible Agency: State Action

Recommendation Narrative: It is recommended that the grant workplan be updated annually to reflect any changes in guidance/policy for that fiscal year.

Recommendation Title: FDEP review the SV facilities and determine if the appropriate next steps are in accordance with the RCRA Enforcement Response Policy.

Element: E11 Data Accurate

Finding: According to the data metric, in Florida there were 17 facilities that were in violation for greater than three years. The data metrics do not indicate that SNC determinations were being withheld from entry into RCRAInfo until enforcement actions are complete. There are, however, a significant number of Secondary Violators that appear to have longstanding violations without being re-designated as SNC facilities.

Status: Working

Expected Completion Date: 09/30/2009

Responsible Agency: State Action

Recommendation Narrative: It is recommended that FDEP review the SV facilities and determine if the appropriate next steps are in accordance with the RCRA Enforcement Response Policy. FDEP should share the results of their review and analysis with the Region.

Definition of Terms

Round 1 Elements:

Element 1: Degree to which state program has completed the universe of planned inspections/compliance evaluations (addressing core requirements and federal, state, and regional priorities).

Element 2: Degree to which inspection reports and compliance reviews documents inspection findings, including accurate description of what was observed to sufficiently identify violations.

Element 3: Degree to which Compliance Monitoring Reports are completed in a timely manner, including timely identification of violations.

Element 4: Degree to which significant violations (e.g., significant noncompliance and high priority violations) and supporting information are accurately identified and reported to EPA national databases in a timely manner.

Element 5: Degree to which state enforcement actions include required corrective or complying actions (injunctive relief) that will return facilities to compliance in a specific time frame.

Element 6: Degree to which a state takes timely and appropriate enforcement actions in accordance with policy relating to specific media.

Element 7: Degree to which a state includes both gravity and economic benefit calculations for all penalties, appropriate using BEN model of similar state model (where in use and consistent with national policy).

Element 8: The degree to which penalties in final enforcement actions include economic benefit and gravity in accordance with applicable penalty policies.

Element 9: Degree to which enforcement commitments in the PPA/PPG/categorical grants (SEAs), written agreements to deliver a product/project at a specified time are met and any products or projects are completed.

Element 10: Degree to which the Minimum Date Requirements are timely.

Element 11: Degree to which the Minimum Date Requirements are accurate.

Element 12: Degree to which the Minimum Date Requirements are complete.

Element 13: Optional evaluation element could include program areas such as compliance assistance, pollution prevention, innovation, incentive or self-disclosure programs, outcome

measures, environmental indicators, relationships with Attorney General or other legal offices, etc.

Finding: An observation of activities, processes, or policies that the metrics and/or the file reviews show are being implemented by the state that have significant problems that need to be addressed and that require follow-up EPA oversight.

Status:

Working: The recommendation is in progress, it is expected to be completed, and it is on schedule to meet agreed upon completion date

Completed: The terms of recommendation have been implemented, the corrections have been agreed upon, and the work attributed to the recommendation was completed

Being Negotiated: The region and the state still have to determine the timeline and the procedures for implementing the recommendation, the timeline of recommendation cannot be determined by the completion of the final report

Long Term Resolution: The recommendation cannot be completed without legislative fix, policy change, or institutional arrangement that would have to go on to the future

Responsible Agency: The agency that administers the program. Mostly States, but is EPA where EPA directly implements the program.

List of Acronyms

A

ACS – Annual Commitment System
ASHERA – Asbestos Hazard and Emergency Response Act
AFS – Air Facilities System
AFS ICR - Air Facilities System – Information Collection Request
AST – Above Ground Storage Tank
ASDWA – Association of State Drinking Water Administrators

B

BIA – Bureau of Indian Affairs
BMP – Best Management Practices
BoP – Bureau of Prisons

C

CA – Compliance Assistance
CAA – Clean Air Act
CAC – Compliance Assistance Coordinator
CACDS – Compliance Assistance Conclusion Data Sheet
CAFO – Concentrated Animal Feeding Operations
CBP – Bureau of Customs and border Protection
CBI – Confidential Business Information
CCDS – Case Conclusion Data Sheet
CEC – Commission for Environmental Cooperation
CEI – Compliance Evaluation Inspection
CERCLA – Comprehensive Environmental Response, Compensation and Liability Act
CESQG – Conditionally-exempt Small Quantity Generator
CID – Criminal Investigation Division
CIPs – Compliance Incentive Programs
CMS - Compliance Monitoring Strategy
CSOs – Combined Sewer Overflows
CSS – Combined Sewer Systems
CWA – Clean Water Act
CFC – Chlorofluorocarbon

D

DMR – Discharge Monitoring Report

E

EA – Environmental Assessment
EIS – Environmental Impact Statement
EJ – Environmental Justice
EJAC – Environmental Justice Areas of Concern

EJSEAT – Environmental Justice Strategic Enforcement Assessment Tool
EMP – Environmental Management Practices
EMR – Environmental Management Reviews
EMS – Environmental Management System
EPA – Environmental Protection Agency
EPCRA – Emergency Planning and Community Right to Know Act
ERPs – Enforcement Response Policies
ERP – Environmental Results Program
ESD – Explanations of Significant Differences

F

FCE – Full Compliance Evaluation
FEMA – Federal Emergency Management Agency
FFEO – Federal Facilities Enforcement Office
FIFRA – Federal Insecticide Fungicide and Rodenticide Act
FRP – Facility Response Plan
FTE – Full Time Equivalent

G

GAO – Government Accounting Office
GME – Groundwater Monitoring Evaluation
GPRA – Government Performance and Results Act

H

HAP – Hazardous Air Pollutant
HPV – High Priority Violators
HQ - Headquarters
HUD – Housing and Urban Development

I

IAC – Innovative Action Council
ICDS – Inspection Conclusion Data Sheet
ICIS – Integrated Compliance Information System
ICIS – NPDES Integrated Compliance Information System – National Pollutant Discharge Elimination System
IG – Inspector General
INECE – International Network for Environmental Compliance and Enforcement
IU – Industrial users (non-domestic)
IPOD – ICIS Policy on Demand

L

LBP – Lead-based Paint
LDAR - Leak Detection and Repair
LEA – Local Education Authority
LGEAN – Local Government Environmental Assistance Network
LQG – Large Quantity Generator

M

MACT – Maximum Achievable Control Technology
MDR – Minimum Data Requirements
MOA – Memorandum of Agreement
MS4 – Municipal Separate Storm Sewer System

N

NAAQS – National Ambient Air Quality Standards
NEIC – National Enforcement Investigations Center
NEJAC – National Environmental Justice Advisory Council
NEPA – National Environmental Policy Act
NESHAP – National Emissions Standards for hazardous Air Pollutants
NETI – National Enforcement Training Institute
NOV – Notice of Violation
NO_x – Nitrogen Oxide
NPDES – National Pollutant Discharge Elimination System
NPL – National Priorities List
NPM – National Program Manager
NRC – National Response Center
NSPS – New Source Performance Standards
NSR – New Source Review
NTP – National Training Plan

O

OAM – Operation and Maintenance
OAP – Office of Administration and Policy
OC – Office of Compliance
OCE – Office of Civil Enforcement
OCEFT – Office of Criminal Enforcement, Forensics and Training
OCFO – Office of Chief Financial Officer
OCIR – Office of Congressional and Intergovernmental Relations
ODS – Ozone Depleting Substances
OECA- Office of Compliance and Assurance
OEJ – Office of Environmental Justice
OGD – Office of Grants and Disbarment
OIG – Office of the Inspector General
OMB – Office of Management and Budget
OPP – Office of Pesticide Programs
OPPTS – Office of Prevention, Pesticides, and Toxic Substances
OSWER – Office of Solid Waste and Emergency Response
OTIS – Online Tracking Information System

P

PBT – Persistent Bio-accumulative Toxics
PCB – Polychlorinated Biphenyls

PCE – Partial Compliance Evaluation
PCS – Permit Compliance System
PEI – Production Establishment Inspections
PFA – Preliminary Financial Assessments
PM10 – Particulate Matter
POTW – Publically Operated Treatment Works
PPA – Performance Partnership Agreement
PPG – Performance Partnership Grants
PRP – Potentially Responsible Party
PSD – Prevention of Significant Deterioration
PWS – Public Water System
PWSS – Public Water System Supervision

R

RCRA – Resource Conservation Recovery Act
RCRAInfo – Resource Conservation and Recovery Act Information
RECAP – Regional Enforcement and Compliance Assurance Program
RMP – Risk Management Plan
ROD – Record of Decision
RR+P – Renovation, Repair and Painting

S

SAAP – Special Appropriations Act Projects
SAC – Special Agent-in-Charge
SCAP – Superfund Comprehensive Accomplishment Planning
SDWA – Safe Drinking Water Act
SDWIS/ODS – Safe Drinking Water Information System/ Operational Data System
SEC – Securities and Exchange Commission
SEE – Senior Environmental Employment
SEP – Supplemental Environmental Project
SGTM – State Grant Template Measures
SITS – Strategy Implementation Teams
SLPD – Special Litigation and Projects Division
SNCs – Significant Noncompliance
SOC – Significant Operational Compliance
SO2 – Sulfur Dioxide
SPCC – Spill Prevention Control and Countermeasures
SQG – Small Quantity Generator
SRF – State Review Framework
SSO – Sanitary Sewer Overflows
STAG - -State and Tribal Assistance Grant
SWPPP – Stormwater Pollution Prevention Plan

T

TSCA – Toxic Substance Control Act
TSD - Treatment, Storage and Disposal

TSDF – Treatment, Storage and Disposal Facility
TSS – Total Suspended Solids
TVA – Tennessee Valley Authority

U

UIC – Underground Injection Control
UNICOR – trade name of Federal Prison Industries
UST – Underground Storage Tank

V

VOC – Volatile Organic Compounds

W

WW – Wet Weather