

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

**Illinois Environmental Protection Agency (IEPA)**

39 Recommendations

---

**Clean Air Act Recommendations**

**Recommendation Title:** Submit CMS plan by September 30 of the relevant fiscal year.

**Element:** E1 Insp Universe

**Finding:** CMS plans not submitted.

**Status:** Completed

**Expected Completion Date:** 10/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Submit CMS plan by September 30 of the relevant fiscal year.

**Recommendation Title:** Report all MDRs in a timely, complete, and accurate manner.

**Element:** E1 Insp Universe, E10 Data Timely, E12 Data Complete

**Finding:** MDRs not reported to AFS.

**Status:** Completed

**Expected Completion Date:** 12/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Report all MDRs in a timely, complete, and accurate manner.

**Recommendation Title:** Send memo to field inspectors about duplication of report content from previous CMR and provide detailed enforcement history in background section of the CMR.

**Element:** E1 Insp Universe, E10 Data Timely, E12 Data Complete

**Finding:** Inspection reports duplicate content and do not provide enough detail.

**Status:** Being Negotiated

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Send memo to field inspectors about duplication of report content from previous CMR and provide detailed enforcement history in background section of the CMR.

**Recommendation Title:** Revise violator classification form to add HPV criteria codes with HPV definitions.

**Element:** E4 SNC Accuracy

**Finding:** Issue with HPV identification definitions.

**Status:** Completed

**Expected Completion Date:** 12/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Revise violator classification form to add HPV criteria codes with HPV definitions.

**Recommendation Title:** Create guidance that defines for the CDG when a case should be referred to the AGO or U.S. EPA or when the CCA process should be used.

**Element:** E5 Return to Compliance

**Finding:** Return to compliance not being achieved in many cases.

**Status:** Completed

**Expected Completion Date:** 12/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Create guidance that defines for the CDG when a case should be referred to the AGO or U.S. EPA or when the CCA process should be used.

**Recommendation Title:** Commit to resolving CCAs within a year.

**Element:** E6 Timely & Appropriate Actions

**Finding:** CCAs not being resolved within a year.

**Status:** Completed

**Expected Completion Date:** 12/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Commit to resolving CCAs within a year.

**Recommendation Title:** Refer cases to U.S. EPA that will exceed the 270 day resolution deadline.

**Element:** E6 Timely & Appropriate Actions

**Finding:** Cases exceeding 270 day resolution deadline.

**Status:** Being Negotiated

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Refer cases to U.S. EPA that will exceed the 270 day resolution deadline.

**Recommendation Title:** Include calculations of all assessed penalties in enforcement case file and calculate BEN, when appropriate. If BEN is not used, document the rational in enforcement case file.

**Element:** E7 Penalty Calculations

**Finding:** Penalty calculations not documented.

**Status:** Completed

**Expected Completion Date:** 10/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Include calculations of all assessed penalties in enforcement case file and calculate BEN, when appropriate. If BEN is not used, document the rational in enforcement case file.

**Recommendation Title:** Update the EMS to include additional instructions on calculation and documentation of penalties.

**Element:** E7 Penalty Calculations

**Finding:** Penalty calculations not documented.

**Status:** Being Negotiated

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Update the EMS to include additional instructions on calculation and documentation of penalties.

**Recommendation Title:** Create plan to report all MDRs in a timely, complete, and accurate manner.

**Element:** E10 Data Timely, E12 Data Complete

**Finding:** MDRs not reported to AFS.

**Status:** Completed

**Expected Completion Date:** 12/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Create plan to report all MDRs in a timely, complete, and accurate manner.

**Recommendation Title:** Conduct training to staff on MDR reporting.

**Element:** E10 Data Timely, E12 Data Complete

**Finding:** MDRs not reported to AFS.

**Status:** Completed

**Expected Completion Date:** 12/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Conduct training to staff on MDR reporting.

**Recommendation Title:** Report all Violation Notices.

**Element:** E10 Data Timely, E12 Data Complete

**Finding:** MDRs not reported to AFS.

**Status:** Completed

**Expected Completion Date:** 12/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Report all Violation Notices.

## **Clean Water Act Recommendations**

**Recommendation Title:** Develop interim inspection strategy.

**Element:** E1 Insp Universe

**Finding:** Need inspection strategy.

**Status:** Working

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Develop interim inspection strategy.

**Recommendation Title:** Revise inspection classifications.

**Element:** E2 Violations ID'ed Appropriately  
**Finding:** Inspections not classified per national definitions.  
**Status:** Working  
**Expected Completion Date:** 12/31/2009  
**Responsible Agency:** State Action  
**Recommendation Narrative:** Revise inspection classifications.

**Recommendation Title:** Update Field Inspection Strategy and Plan to include current RECON processes.

**Element:** E2 Violations ID'ed Appropriately  
**Finding:** RECON inspection process needs to be updated in state policy.  
**Status:** Working  
**Expected Completion Date:** 12/31/2009  
**Responsible Agency:** State Action  
**Recommendation Narrative:** Update Field Inspection Strategy and Plan to include current RECON processes.

**Recommendation Title:** Properly code CCAs in PCS.

**Element:** E5 Return to Compliance  
**Finding:** CCAs not being properly coded in PCS.  
**Status:** Long Term Resolution  
**Expected Completion Date:** 12/31/2009  
**Responsible Agency:** State Action  
**Recommendation Narrative:** Properly code CCAs in PCS.

**Recommendation Title:** Use manual overrides properly per guidance.

**Element:** E6 Timely & Appropriate Actions  
**Finding:** Manual overrides improperly used in some circumstances.  
**Status:** Completed  
**Expected Completion Date:** 10/30/2007  
**Responsible Agency:** State Action  
**Recommendation Narrative:** Use manual overrides properly per guidance.

**Recommendation Title:** Document gravity and economic benefit calculations in all files.

**Element:** E7 Penalty Calculations  
**Finding:** Penalty calculations not documented.  
**Status:** Working  
**Expected Completion Date:** 12/31/2009  
**Responsible Agency:** State Action  
**Recommendation Narrative:** Document gravity and economic benefit calculations in all files.

**Recommendation Title:** Update EMS for documentation of penalty calculations.

**Element:** E7 Penalty Calculations  
**Finding:** Penalty calculations not documented.  
**Status:** Working

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Update EMS for documentation of penalty calculations.

**Recommendation Title:** Issue guidance for appropriate location of penalty collection information.

**Element:** E8 Penalties Collected

**Finding:** Penalty collection information not documented.

**Status:** Working

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Issue guidance for appropriate location of penalty collection information.

**Recommendation Title:** Develop or improve process for timely, complete, and accurate data entry into PCS.

**Element:** E10 Data Timely

**Finding:** All required information not being reported to PCS.

**Status:** Completed

**Expected Completion Date:** 12/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Develop or improve process for timely, complete, and accurate data entry into PCS.

**Recommendation Title:** Develop and implement a plan to address erroneous compliance schedule violations.

**Element:** E12 Data Complete

**Finding:** Compliance schedule violation date coded erroneously.

**Status:** Working

**RCRA**

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Develop and implement a plan to address erroneous compliance schedule violations

## **Resource Conservation and Recovery Act Recommendations**

**Recommendation Title:** Clean up RCRAInfo in regard to universe counts.

**Element:** E1 Insp Universe

**Finding:** Universe counts in RCRAInfo not correct.

**Status:** Working

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Clean up RCRAInfo in regard to universe counts.

**Recommendation Title:** Conduct all planned TSDF inspections.

**Element:** E1 Insp Universe

**Finding:** All TSDFs not inspected as required.

**Status:** Completed

**Expected Completion Date:** 04/30/2008

**Responsible Agency:** State Action

**Recommendation Narrative:** Conduct all planned TSDF inspections.

**Recommendation Title:** Develop policy for complete inspection reports.

**Element:** E2 Violations ID'ed Appropriately

**Finding:** Incomplete inspection reports.

**Status:** Completed

**Expected Completion Date:** 12/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Develop policy for complete inspection reports.

**Recommendation Title:** Conduct training on components of inspection report.

**Element:** E2 Violations ID'ed Appropriately

**Finding:** Incomplete inspection reports.

**Status:** Completed

**Expected Completion Date:** 12/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Conduct training on components of inspection report.

**Recommendation Title:** Revise EMS to include target for inspection report completion (or memo, or strategy).

**Element:** E3 Violations ID'ed Timely

**Finding:** Timeline for inspection report completion not formal.

**Status:** Working

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Revise EMS to include target for inspection report completion.

**Recommendation Title:** Begin dating inspection reports.

**Element:** E3 Violations ID'ed Timely

**Finding:** Inspection reports are not dated.

**Status:** Completed

**Expected Completion Date:** 12/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Begin dating inspection reports.

**Recommendation Title:** Create policy for inspection report timeline.

**Element:** E3 Violations ID'ed Timely

**Finding:** No timelines for inspection reports.

**Status:** Completed

**Expected Completion Date:** 12/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Create policy for inspection report timeline.

**Recommendation Title:** Identify all SNCs and report to RCRAInfo in a timely manner.

**Element:** E4 SNC Accuracy

**Finding:** SNCs not reported completely and in a timely manner.

**Status:** Completed

**Expected Completion Date:** 10/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Identify all SNCs and report to RCRAInfo in a timely manner.

**Recommendation Title:** Include injunctive relief/compliance schedule with enforcement actions.

**Element:** E5 Return to Compliance

**Finding:** No injunctive relief/compliance schedule in Orders.

**Status:** Completed

**Expected Completion Date:** 10/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Include injunctive relief/compliance schedule with enforcement actions.

**Recommendation Title:** Revise EMS to be clear when formal action is required and when CCAs can be used (or memo).

**Element:** E5 Return to Compliance

**Finding:** Some facilities are not coming back into compliance.

**Status:** Working

**Expected Completion Date:** 12/31/2009

**Responsible Agency:** State Action

**Recommendation Narrative:** Revise EMS to be clear when formal action is required and when CCAs can be used.

**Recommendation Title:** Document gravity and economic benefit calculations in all files.

**Element:** E7 Penalty Calculations

**Finding:** Penalty calculations not documented.

**Status:** Completed

**Expected Completion Date:** 10/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Document gravity and economic benefit calculations in all files.

**Recommendation Title:** Update EMS for documentation of penalty calculations.

**Element:** E7 Penalty Calculations

**Finding:** Penalty calculations not documented.

**Status:** Completed

**Expected Completion Date:** 12/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Update EMS for documentation of penalty calculations.

**Recommendation Title:** Enter SNCs into RCRAInfo within 30 days.

**Element:** E10 Data Timely

**Finding:** SNC inputs not timely.

**Status:** Completed

**Expected Completion Date:** 10/31/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Enter SNCs into RCRAInfo within 30 days.

**Recommendation Title:** Implement procedure to track and identify SVs in noncompliance more than 240 days.

**Element:** E11 Data Accurate

**Finding:** Non-timely SNC reporting.

**Status:** Completed

**Expected Completion Date:** 10/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Implement procedure to track and identify SVs in noncompliance more than 240 days.

**Recommendation Title:** Correct reporting errors for seven facilities.

**Element:** E11 Data Accurate

**Finding:** Non-timely SNC reporting.

**Status:** Completed

**Expected Completion Date:** 10/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Correct reporting errors for seven facilities.

**Recommendation Title:** Report IL data counts and compare to RCRAInfo.

**Element:** E12 Data Complete

**Finding:** Data counts not confirmed and discussed.

**Status:** Completed

**Expected Completion Date:** 10/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Report IL data counts and compare to RCRAInfo.

**Recommendation Title:** Provide updates on all universe and action counts on quarterly conference calls

**Element:** E12 Data Complete

**Finding:** Universe counts unknown.

**Status:** Completed

**Expected Completion Date:** 10/30/2007

**Responsible Agency:** State Action

**Recommendation Narrative:** Provide updates on all universe and action counts on quarterly conference calls

## 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<sub>x</sub> – 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